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## 1. Overview

SPARK Energy is committed to complying with the law and ensuring the highest standard of honesty and integrity in all its activities. We expect our employees and contractors to do the right thing and comply with applicable laws, codes and policies. Our company has zero tolerance for and strictly prohibits bribery, corruption and fraudulent or dishonest conduct by employees and contractors.

## 2. Aims & Objectives

The purpose of this policy is to ensure you understand:

- how you should conduct yourself and your obligations to minimise the risk of bribery, corruption or fraud occurring in connection with operations;
- your obligations when offering or being offered gifts or hospitality;
- your responsibilities to recognise and deal with bribery, corruption or other improper conduct; and
- what to do if you have any concerns that an employee or contractor may be acting outside this policy and/or engaging in unlawful conduct.

## 3. Your Obligations

This policy applies to everyone who works at our company including all Directors, employees and contractors.

It's your responsibility to read, be aware of, and comply with this policy.

You must not:

- offer, promise, give, request, accept, or agree to receive a bribe, whether directly or indirectly. This applies to dealings with both public officials and individuals in private entities;
- offer or make, directly or indirectly, any facilitation payment to a public official;
- offer and/or make a secret commission; or

- engage in any acts of fraud or corruption.

## How to raise a concern

We encourage you to speak up, and report any actual or suspected breach of this policy. If you have any concerns that a person connected with our company may be acting outside this policy or engaging in unlawful conduct, you should take the following action:

- notify our Managing Director, Greg Pipicella.

## 4. Monitoring and Investigation

We will monitor and enforce this policy and associated procedures and suspected contraventions will be investigated.

## What are the potential consequences of bribery and corruption?

Bribery, corruption and the other types of improper or dishonest conduct prohibited by this policy may also contravene applicable anti-bribery and corruption laws. Possible consequences of contravention of applicable anti-bribery and corruption laws include:

- for our company, the imposition of substantial fines, exclusion from tendering for government or private contracts and reputational damage; and
- for individuals, criminal and civil liability with associated significant fines and/or lengthy terms of imprisonment.

## 5. What happens if I breach this policy?

It's your responsibility to understand and comply with this policy. We treat non-compliance seriously and resulting action could include suspension, or termination of employment or engagement with our company. We may also refer the matter to appropriate government or law enforcement agencies.

## 6. Change History

Version	Author	Reviewed		Approved		Details of amendments
		Name	Date	Name	Date	
1.0	Paul Albanese			Greg Pipicella	11/2022	Original Issue