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1. Overview

Modern slavery is a term which covers a range of exploitative practices including human trafficking, sexual exploitation, forced labour, forced criminality, domestic servitude, child exploitation and forced organ removal. SPARK Energy is committed to limiting the risk of modern slavery within our own business, within supply chains or through any other business relationships. The context of this policy for our company is to ensure we are not dealing with companies who are exploiting employees by not paying the correct wage requirements and benefits with state and federal laws.

2. Aims and Objectives

This Policy applies to all persons working for or on behalf of, or providing services to our company in any capacity, including all Suppliers, Employees, Directors, officers, agency workers, contractors, consultants and any other third-party representatives.

Our company expects that all who have, or seek, a relationship with us to familiarise themselves with this Policy and to act in a way that is consistent with its values.

Our company will only do business with Suppliers who fully comply with this Policy, or those who are taking verifiable steps towards compliance.

3. Your Obligations

All employment with our company is voluntary.

Our company does not use or condone, child or forced labour in any of its operations or premises and works to ensure these practices are not present in its workforce or supply chain.

Our company does not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude.

We abide by all laws and regulations regarding pay practices and the classification of employment according to job level and status.

This Policy will be used to underpin and inform any statement on modern slavery that our company is required to produce as a result of legislative requirements in any country in which we operate in.

4. SPARK Energy Pty Ltd Supply Chain

Our company expects its Suppliers to have similar values to our operations in relation to modern slavery.

We engage with suppliers to promote and support anti-slavery practices throughout our supply chain.

We are committed to introducing anti-slavery obligations in all Supplier contracts. As part of their contractual obligations, Suppliers will agree to undertake a process so our company can gauge the Supplier’s ongoing commitment to eradicating modern slavery within its own business and those of its own suppliers.

5. Non-compliance with this Policy

Any breach of this Policy will be taken seriously and dealt with on a case by case basis.

A breach of this Policy by an employee may lead to disciplinary action being taken in accordance with our company’s disciplinary process. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to the disciplinary procedure.

A breach of this Policy by a supplier will also be dealt with on a case by case basis. Depending on the behaviour, we may choose to adopt a zero-tolerance stance towards the supplier’s behaviour and look at methods of preventing further engagement with the supplier, or may decide to work with the supplier so they become compliant with this Policy.

6. Review process

This policy will be reviewed at a minimum each 12 months or earlier if changes are required

7. Change History

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