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### 1. Overview

One of SPARK Energy management principles states that we will maintain the highest standards of ethics and business conduct and operate at all times within the laws of Australia in which we do business. In order to fulfill this principle, there are certain standards of conduct that you are required to follow.

### 2. Conflict of Interest

It is important that you are careful to avoid situations that might involve a conflict of interest or appear questionable to others. In general, there are two major areas of concern:

- participating in activities that conflict or appear to conflict with SPARK Energy responsibilities.
- giving or receiving anything that might influence the recipient or cause another person to believe that the recipient may be influenced - this includes offering or accepting bribes, 'kickbacks', illegal payments, gratuities or sizeable gifts.

### 3. Solicitation, Receipt and Use of Proprietary or Source Selection Information

No SPARK Energy employee or representative may solicit, obtain or utilise information relating to procurement other than through proper and intended channels.

### 4. Data, Records and Reports

You are responsible for preparing all SPARK Energy business documents as completely, honestly and accurately as possible. These records include time sheets, expense reports, accounting records, test and progress records, cost estimates, contract proposals and presentations to clients, the public or SPARK Energy management, and any representation, either written or oral, made by any SPARK Energy employee or representative in the conduct of SPARK Energy business shall be factual, fully substantiated, and verifiable.

**5. Ensuring a Professional Work Environment**

You are expected to use fairness, honesty and regard for the law in all your business relationships with SPARK Energy shareholders, customers, suppliers, employees and applicants, as well as with local, national and international communities and governments.

**6. Communications Between SPARK Energy and You**

You are responsible for obtaining the information necessary to follow directives in relation to Standards of Conduct and for reporting any observed deviations from policies to the Managing Director. SPARK Energy fosters a free interchange between employees and all levels of management through its Open Door policy.

**7. Procedure**

**Role of Employee**

This policy provides guidance on ethical issues and expected standards of behavior at SPARK Energy. It is your responsibility to ensure that you abide by the abovementioned SPARK Energy ethical principles.

**Role of Management**

The Managing Director must ensure that employees are made aware of this policy at the time of induction to SPARK Energy.

**8. Change History**

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