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INTELLIHUB GROUP MODERN SLAVERY STATEMENT

THIS STATEMENT
ADDRESSES THE PERIOD
FROM 1 JULY 2021 TO
30 JUNE 2022.

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INTRODUCTION

Modern slavery is one of the most complex and important human rights challenges of our time. According to the International Labour Organisation, the term modern slavery covers a set of legal concepts, including forced labour, debt bondage, slavery of children and human trafficking.

Modern slavery is an umbrella term to refer to situations of exploitation that an individual cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power.

At Intellihub, we do not tolerate modern slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chain.

This statement sets out the actions that the Intellihub Group has taken to understand and address potential modern slavery risks related to our business.

THE INTELLIHUB BUSINESS

STRUCTURE

Intellihub Group is made up of privately held Australian and New Zealand companies, employing over 300 people across offices in Sydney, Melbourne, Auckland, Hobart and Brisbane.

OPERATIONS

The Intellihub Group is a utility services company that delivers innovative metering and data solutions to maximise digital and new energy services. We are an experienced and leading provider of multi-utility services for residential, commercial & industrial, embedded network and solar metering customers.

CONSULTATION

As part of preparing this statement, we consulted with Executive Leaders and directors for the reporting entities within the Intellihub Group who have reviewed and approved the content. Our consultation included review by the Executive Leaders of our subsidiary companies both within Australia and in New Zealand. All our subsidiaries are required to follow the same policies and processes despite not being reporting entities or, in the case of our New Zealand subsidiary, not directly being subject to the Australian Modern Slavery legislation. In addition, this statement has been approved on 20/10/2022 by the Board of Directors of Spark Investment Holdco Pty Ltd as the parent entity for the Intellihub Group and its reporting entities.

GOVERNANCE

We are committed to embedding human rights considerations into decision-making, our policies and governance framework. Members of executive leadership and our Board formally review and approve Intellihub policies, including those listed above.

Our Executive Leaders and Board were also intimately involved in creating and endorsing our ESG Framework. The ESG Framework provides the basis for ongoing efforts to meet our commitments to partner and work with our suppliers to combat modern slavery and human trafficking and improve working conditions. We reinforce, monitor, and assess our ESG Framework commitments by reflecting them as significant components of our Executive Leaders' KPIs, which are cascaded down to individual KPIs through our organisation.

REPORTING ENTITIES

This Modern Slavery Statement is provided on behalf of the following reporting entities within the Intellihub Group:

1. Spark Investment Holdco Pty Ltd
ACN 626 001 394
2. Spark Investment Midco Pty Ltd
ACN 626 002 248
3. Intellihub Holdings Pty Ltd
ACN 626 003 236
4. Intellihub Australia Pty Ltd
ACN 626 079 614



ASSESSING OUR RISK

OUR SUPPLY CHAIN

Our supply chains include major global suppliers with manufacturing locations in Indonesia, China and Malaysia and we are committed to improving the working conditions of people who are connected to our business and recognise the need to monitor for conditions that put workers at risk of modern slavery.

As part of providing our customers with utility services and data solutions, our supply chain includes suppliers spanning the following major spending categories:

1. Smart metering and communications devices, and associated equipment which we primarily own and install, allowing us to provide managed services to our customers who are overwhelmingly electricity retail businesses;
2. Smart metering device installation, and maintenance services, provided by qualified electrical field service technicians;
3. Software, data, mobile connectivity, telecommunications, and other information technology services enabling our technology platform and allowing us to provide metering and other data services to our customers; and
4. General operations and corporate services, including freight/shipping, legal services, insurance, office information technology and support.

MODERN SLAVERY RISKS

As a company that purchases a large volume of smart metering and communication devices, we consider that the main modern slavery risk in our supply chain comes from exposure to product manufacturing supply chains.

We source our smart meters and associated communications technology from reputable global suppliers. Some of these suppliers partly operate in geographies with an elevated modern slavery risk for manufacturing, including China, Indonesia and Malaysia.

While modern slavery can be found in all countries, suppliers with manufacturing operations in countries associated with a higher risk for modern slavery, for example, countries with large populations of migrant workers, weak labour law enforcement, countries where charging workers recruitment fees is common practice, or countries where modern slavery prevalence has been well documented. Even though the suppliers we purchase from are well-established reputable organisations, we are careful to manage our relationships and contracting practices in a manner which helps ensure workers are safe.



OUR ACTIONS

OUR MODERN SLAVERY POLICIES

Our policies communicate the Intellihub Group's values and expectations, setting standards for ourselves and our partners while making clear that we do not tolerate modern slavery. These policies demonstrate our strong stance against modern slavery and include our:

1. Environmental Social Governance (ESG) Framework;
2. Modern Slavery Policy;
3. Code of Conduct; and
4. Whistle-Blower Policy.

Within the last reporting period, we launched our new ESG Framework. This framework sets out our goals and commitments in relation to combatting modern slavery and gives us a pathway forward to follow which supports and requires responsible sourcing, a safer workplace, helps drive zero emissions and enables each of us and everyone involved in our operations and supply chain to thrive.

In particular, our ESG Framework directly addresses modern slavery under the Responsible Sourcing Pillar. Our ambition is to ensure we are partnering for social impact across our value chain, with specific targets and actions, including:

1. To work with our suppliers to educate and raise awareness of our commitment to combat modern slavery and human trafficking; and
2. All tier 1 suppliers confirm their commitment to improving working conditions in combating modern slavery as a pre-condition by 2025.

During the reporting period, we also finalised our refreshed Code of Conduct, which, amongst other things specifically addresses Modern Slavery. This Code of Conduct is publicly available on our website and to our employees via our intranet.

We also began the process of reviewing and updating our Procurement Policy. Although this policy was not finalised within the reporting period, this work will continue and we expect our updated policy to be finalised during FY23.

OUR CONTRACTING PRACTICES

As part of our ongoing efforts to address the risks of modern slavery in our supply chain, we are committed to ensuring that appropriate contractual protections and obligations are included in new supply and procurement agreements.

This includes ensuring our supply and procurement agreements incorporate drafting requiring our suppliers comply with all relevant modern slavery laws and provide assurances around their practices and our expectations.



OUR ACTIONS

OUR CONTRACTING PRACTICES (CONTINUED)

During the reporting period, we entered into a new strategic partnership agreement with one of our largest suppliers. As part of negotiations, we prioritised robust provisions and protections ensuring accountability and compliance around modern slavery, including:

1. taking reasonable steps to identify, assess and address risks of modern slavery practices in the operations and supply chains used (including any third party); and
2. assurances that no form of forced, compulsory or slave labour is used.

In addition to the above controls, where we identify non-compliance with modern slavery obligations by our suppliers, we have internal documents and guidelines setting out further investigation assessment questions for vendors and remediation guidance.

APPROVAL AND SIGNATURE

The Intellihub Group's Modern Slavery Statement has been approved by the Board of Directors of Spark Investment Holdco Pty Ltd as the parent entity and *principal governing body* for the Intellihub Group and its *reporting entities*.

Wes Ballantine Intellihub

Group CEO

Wesley Ballantine

20 October 2022

This is a joint modern slavery statement made pursuant to section 14 of the Modern Slavery Act 2018 (Cth).

It constitutes the joint modern slavery statement of Spark Investment Holdco Pty Ltd, Spark Investment Midco Pty Ltd, Intellihub Holdings Pty Ltd and Intellihub Australia Pty Ltd. for the reporting period 1 July 2021 to 30 June 2022.

This modern slavery statement addresses each of the mandatory criteria for content set out in section 16 of the Modern Slavery Act 2018 (Cth).

