

# Diversity and Inclusion Policy



## Policy Statement

At Spark we believe that building diversity and inclusion as well as proactively recognising equality across our business will deliver enhanced customer experiences and business performance. Rich backgrounds, experience and perspectives are critical to build a leading edge business and deliver for our customers. Spark is committed to pay parity as well as attracting, recruiting, developing, promoting and retaining a diverse group of talented individuals, who will help drive Spark's business performance.

This policy applies to Spark New Zealand Limited and its related companies, including Spark Finance Limited (together **Spark**).

## Background

Diversity and Inclusion is a commitment to recognising and appreciating the variety of characteristics that make individuals unique in an atmosphere that promotes and celebrates individual and collective achievement. Examples of these characteristics include gender, age,

culture, accessibility (neurodiverse, learning, physical), economic background, education, cultural, geographic background, language(s) spoken, marital/partnered status, physical appearance, race, religious beliefs, gender identity, sex and sexual orientation.

Spark's four values of Tūhono - We Connect, Māia - We Are Bold, Whakamana - We Empower and Matomato - We Succeed Together inherently recognise the importance of diversity and inclusion in helping Spark deliver its business objectives and fulfill the needs of its customers.

Practising diversity and inclusion means incorporating diversity into Spark's talent acquisition, talent management, succession management processes and into our values and culture. This ensures that our workforce reflects the diverse communities in which we operate and our customer base.

## Diversity Measurable Objectives

The Spark Board ("Board") sets and reviews measurable objectives each

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year designed to adhere to Spark's diversity and inclusion policy. The Human Resource & Compensation Committee ("HRCC") will recommend the measurable objectives to the Board. The Board will assess annually both the measurable objectives and Spark's progress towards achieving them, and will ensure the appropriate disclosures are made in the Annual Report.

As a baseline for measurable objectives for diversity of Board composition, Spark will ensure it has an objective in accordance with, or in excess of, the standard set out in the NZX Corporate Governance Code, that is the composition of the Board is not to have less than 30% of its directors being male and not less than 30% of its directors being female, within a specified period.

## Roles and Responsibilities

The responsibilities of specific groups are:

### Board

Responsible for approving the measurable objectives developed by management and the HRCC and conducting an annual assessment of this policy, the objectives, and the progress made towards achieving them.

### HRCC

Responsible for recommending measurable objectives for achieving diversity and inclusion to the Board, reporting on progress towards achieving those objectives, and ensuring that appropriate disclosures are made in Spark's annual report regarding diversity and inclusion. The HRCC will also lead, on behalf of the Board, the annual assessment of this policy to determine its effectiveness, and the assessment of objectives and the progress made towards achieving them.

The HRCC will annually review and report to the Board on the relative

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proportion of gender and cultural diversity which make up the Company's workforce, at all levels of the business.

## **Chief Executive/ Leadership Squad**

Responsible for developing and, once approved by the Board, implementing the measurable objectives for achieving diversity and inclusion. Also responsible for reporting to the HRCC on diversity initiatives and progress towards achieving the measurable objectives.

## **Tribe Leads, Chapter Area Leads, Channel and Delivery Unit Leads, Subsidiaries Leads and Centres of Excellence Leads**

Responsible for ensuring Spark people are committed to this policy, their obligations under any applicable diversity and inclusion strategy or initiatives, Spark's obligations under the Human Rights Act 1993 and Spark's commitment to diversity and inclusion in the workforce.

## **All**

Awareness of Spark's commitment to diversity and inclusion in its workforce and adherence to this diversity and inclusion policy.

## **Ownership**

This is a Board Policy that is owned by the Chief People Officer. It will be updated annually or as otherwise required or necessary.

## **Publishing Date**

November 2025