



Simplify your energy transition.

2023-24 Modern Slavery Statement
21.03.2025

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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

The Intellihub Group is made up of privately held Australian and New Zealand companies, employing over 498 people across offices in Sydney, Melbourne, Brisbane, Auckland, Hamilton and Tauranga.

Operations

The Intellihub Group is a utility services company that delivers innovative metering and data solutions to maximise digital and new energy services. We specialise in providing energy solutions from solar to water, virtual power plants to electric vehicle charging.

We are the lead provider of multi-utility services for residential, commercial & industrial, embedded network and solar metering customers. Our core business is the installation, operation, and maintenance of smart electricity meters.

We are rapidly growing our behind the meter business and are working with a range of stakeholders to help households and businesses better optimise electricity consumption. This includes the electrical load from household energy appliances such as solar, batteries, water heating, electric vehicle charging, pool pumps and other household appliances. Through our cloud-based DER (Distributed Energy Resources) software we provide the control and data management required for VPP (Virtual Power Plant) participation.

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 directors 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 21.03.2025 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 ELT (Executive Leadership Team) and our Board formally review and approve Intellihub policies.

Our ELT and Board were also intimately involved in creating and endorsing our ESG Framework. The ESG Framework serves as a foundation for our continued efforts to collaborate with our suppliers in addressing modern slavery and human trafficking, as well as enhancing working conditions.

Acquisitions

Intellihub acquired EVSE in June 2023. Intellihub is currently in the process of thoroughly assessing the risks associated with the EVSE supply chain. We are committed to expanding our supplier assessment to include EVSE suppliers and to fully incorporate them into future statements.

Reporting entities

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

- ✦ Spark Investment Holdco Pty Ltd, ACN 626 001 394
- ✦ Spark Investment Midco Pty Ltd, ACN 626 002 248
- ✦ Intellihub Holdings Pty Ltd, ACN 626 003 236
- ✦ Intellihub Australia Pty Ltd, ACN 626 079 614
- ✦ Intellihub Metering Pty Ltd, ACN 105 423 541
- ✦ Intellihub Ventures Pty Ltd, ACN 626 004 251
- ✦ Intellihub NewCo 2 Pty Ltd, ACN 655 821 300



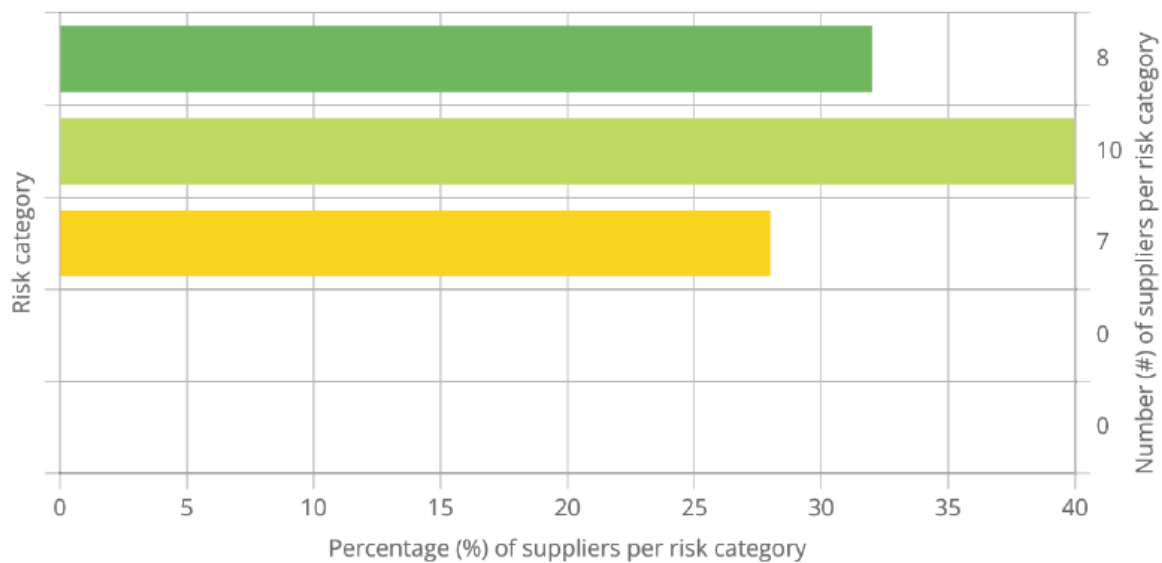
Assessing our risk

Summary

We have assessed the risk of modern slavery of our Tier 1 suppliers. The assessment found that the majority of our Tier 1 suppliers (72%) have a low risk of modern slavery.

We have identified that seven companies in our Tier 1 supply chain (representing 28% of our Tier 1 suppliers) have a medium risk of modern slavery with partial risk controls in place. In 2025, we will work with these suppliers to increase their risk controls to mitigate the risks of modern slavery to a low level.

From our assessment we found 0% of our Tier 1 suppliers at a high risk of modern slavery.



Risk categories	% of suppliers per risk category	# of suppliers per risk category
Low-Risk (No inherent risk)	32%	8
Low-Risk (Adequate risk control)	40%	10
Medium-Risk (Partial risk control)	28%	7
High-Risk (Inadequate risk control)	0%	0
High-Risk (High levels of inherent risk)	0%	0



Our assessment methodology

We have engaged a third party to help us conduct a detailed assessment of the risks of modern slavery in our supply chain.

The assessment has been conducted in line with the Social Responsibility Alliance's Slavery & Trafficking Risk Template which is a global standard for assessing modern slavery risks.

The assessment included an examination of the risks inherent to a supplier's operations, and the risk that remains after accounting for modern slavery risk controls that have been implemented.

As of the date of this Statement, we have assessed our Tier 1 suppliers' risks of modern slavery. Our Tier 1 suppliers are defined according to our annual expenditure along with their importance to our business.

In 2025, we will incrementally assess our other suppliers against this framework.

Inherent risks

We have determined each of our Tier 1 suppliers' inherent risk by asking which countries, regions, sectors and high-risk goods are part of their operations, production or supply chain.

Countries of operation

Our supply chains include major global suppliers with operations around the world, including manufacturing locations in China and Malaysia.

As part of our risk assessment, we have considered whether the countries where our suppliers operate fully meet the U.S Trafficking Victims Protection Act's (TVPA) minimum standards. The TVPA minimum standards are minimum standards for the elimination of trafficking that are applicable to the country of origin, transit, or destination.

Our risk assessment found that some of our Tier 1 suppliers do have operations in countries which have not fully met the TVPA minimum standards.

Sectors of operation

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

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

As part of our risk assessment, we have considered whether the sectors where our supply chain operate produce and/or source goods in one or more of the sectors identified in the Global Estimates of Modern Slavery as a sector with a high risk of forced labour exploitation. The Global Estimates of Modern Slavery is a report prepared by the International Labour Organisation, Walk Free and the International Organisation for Migration that estimates the number of people in situations of modern slavery.

Our risk assessment found that the majority of our Tier 1 supply chain operate, produce and/or source goods in a sector with a high risk of forced labour exploitation. The sectors identified include manufacturing, retail, transportation, storage, and wholesale.

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.



Accordingly, it is important that our Tier 1 suppliers have adequate controls in place to mitigate and manage this risk.

Risk controls

The assessment also included an examination of the risk controls (including policies, processes, and procedures) each of our Tier 1 suppliers have in place to mitigate and manage their inherent risks, including:

- ✦ Implementation of a modern slavery screening and evaluation policy
- ✦ Implementation of a modern slavery vulnerability assessment policy
- ✦ Implementation of a policy prohibiting charging recruitment fees
- ✦ Undertaking modern slavery risk mitigation training
- ✦ Issuing modern slavery policies to suppliers

For each Tier 1 supplier the assessment considered whether inadequate, partial or adequate risk controls are in place to manage modern slavery risks.

Action Plan

Each of our Tier 1 suppliers has been given an action plan that contains additional risk controls that need to be considered. If implemented, these risk controls will further reduce the risk of modern slavery.

In 2025, we will work with our suppliers that have been identified as having partial risk controls to support them implementing the additional risk controls in their action plans.



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:

- ✦ Environmental Social Governance (ESG) Framework
- ✦ Modern Slavery Policy
- ✦ Code of Conduct
- ✦ Whistle-Blower Policy

Our ESG Framework outlines our goals and commitments regarding the risks against modern slavery and provides a clear pathway for responsible sourcing, fostering a safer workplace, promoting zero emissions, and ensuring that everyone involved in our operations and supply chain can thrive.

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

- ✦ Updating our Procurement Policy to incorporate modern slavery considerations.
- ✦ Identifying modern slavery risks within our supply chain and implementing actions to mitigate the risk.
- ✦ Providing ongoing training for our employees to help them identify the signs of modern slavery and understand how to respond effectively if they encounter a suspected modern slavery issue. Our Modern Slavery Policy contains a set of principles, requirements and processes that govern how we mitigate the risk of modern slavery in business. In 2025 we will review the Policy to ensure the principles, requirements and processes reflect our current business practices and are fit for purposes to address the modern slavery risks of our current operations and supply chain.

Our Code of Conduct, which includes specific provisions addressing Modern Slavery, is accessible to the public on our website and can also be found by our employees through our intranet.

We are actively engaged in Sustainable Procurement Initiatives and are in the process of reviewing and finalizing our Sustainable Procurement Policy this year.



Our contracting policies

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 all supply and procurement agreements.

This includes ensuring our supply and procurement agreements incorporate drafting requiring our suppliers to comply with all relevant modern slavery laws and provide assurances around their practices and our expectations. Our robust provisions and protections ensure accountability and compliance around modern slavery, including:

- ✦ 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
- ✦ Assurances that no form of forced, compulsory or slave labour is used.

In addition to the above controls, should we identify any non-compliance with modern slavery obligations by our suppliers, we have prepared internal documents and guidelines that outline additional investigation assessment questions for vendors, as well as remediation guidance. Training We are committed to providing ongoing training for our employees to help them recognize the signs of modern slavery and respond appropriately if they encounter any suspected issues. During FY 2023-2024, 100% of our employees participated in Modern Slavery training. This training is included in our mandatory compliance courses, and we also offer refresher training every two years.

Tracking our performance

We continuously monitor our processes and procedures in line with the modern slavery risks of our business.


We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and external assurance processes.

Based on the results of these processes we will keep adapting and strengthening our actions to continually improve our focus on modern slavery.




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.

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Cameron Blanks
Chairman

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Wes Ballantine
Chief Executive Officer

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, Intellihub Australia Pty Ltd and Intellihub Metering Pty Ltd for the reporting period 1 July 2023 to 30 June 2024.

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

