

Modern Slavery and Human Rights Policy

GreenSpark respects human rights and opposes modern slavery, forced labour, human trafficking, debt bondage, child labour and exploitative working practices. We seek to work with partners who provide safe, fair and lawful working conditions.

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Policy owner: GreenSpark Consulting — Management **Next review:** 1 July 2027

Policy statement

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1. Scope

Applies to GreenSpark's own activities and, proportionately, to suppliers, subcontractors, recruitment providers, consultants and project partners. Particular attention should be paid to labour-intensive services, construction, equipment supply and international project delivery.

2. Standards and expectations

Workers must not be coerced, threatened, charged unlawful recruitment fees or prevented from leaving employment in accordance with law.

Identity documents must not be confiscated or retained as a means of control.

Employment terms, wages, working hours, age requirements and health and safety arrangements must comply with applicable law.

Workers should have access to a suitable route to raise concerns without retaliation. Remediation should prioritise the safety and rights of affected people.

3. Supplier checks

- Use proportionate supplier checks and risk assessments, including questions about recruitment, subcontracting, worker accommodation and grievance routes where relevant.
- Require suppliers to comply with applicable labour and human-rights laws and to cooperate with reasonable checks.
- Do not ignore credible indicators such as workers appearing controlled, unpaid wages, recruitment debt, restricted movement or unsafe accommodation.

4. Concerns and remediation

- Escalate credible concerns promptly and protect the privacy and safety of the person raising them.
- Assess immediate risks and seek specialist advice or contact appropriate authorities or support organisations where warranted.

Engage the supplier on corrective action where safe and appropriate, setting measurable deadlines and follow-up checks. Record decisions and any suspension or termination.

5. Responsibilities and review

Procurement and project leads assess supply-chain risks before appointment and during delivery. Managers ensure concerns are handled sensitively and workers are not exposed to retaliation.

Directors determine whether a statutory modern slavery statement is required and approve it where applicable.

- Keep supplier assessments, contractual commitments, training records, reports, corrective actions and review outcomes. Review annually and when entering a new market or supply chain.

Related guidance

The statutory duty to publish an annual modern slavery statement applies only where the legal criteria are met. Confirm applicability and publication requirements with legal counsel.

Approval and document control

This is the published version 1.0 of this policy, with approval and publication dates recorded as 1 July 2026. It forms part of the GreenSpark Consulting — Governance, Integrity & Responsible Business framework and should be read with other relevant policies and applicable law.

Approved status: Approved **Effective date:** 1 July 2026 **Review date:** 1 July 2027