

Supplier and Third-Party Due Diligence Policy

GreenSpark selects and manages suppliers, consultants, agents and project partners using fair, proportionate and documented checks. We seek value, competence, integrity, environmental responsibility and compliance with relevant legal and contractual requirements.

Status: Final — Approved and Published **Version:** 1.0

Approved: 1 July 2026 **Published:** 1 July 2026

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

Policy statement

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1. Scope and principles

Applies to new and existing suppliers, subcontractors, agents, introducers, consultants and other third parties that create material legal, financial, operational, reputational, data or project risk.

Checks must be proportionate to the nature, value, geography and risk of the relationship. Selection decisions should be based on objective criteria and recorded where material.

- Do not appoint a third party to do something GreenSpark could not lawfully do itself.

2. Due diligence

- Verify identity, legal status, ownership and authority to contract where relevant.
- Assess competence, references, insurance, financial stability and required licences or qualifications in proportion to the work.
- Conduct sanctions, anti-bribery, modern-slavery, privacy and security checks where relevant to the risk.
- Document the business rationale and approvals for agents, success-fee arrangements and material subcontracting.

Resolve material gaps or adverse findings before onboarding, or document approved mitigations where lawful.

3. Contracting and monitoring

Contracts should define scope, fees, deliverables, confidentiality, data protection, compliance expectations, subcontracting requirements and termination rights as appropriate.

Monitor performance and changes in ownership, geography, services or risk; re-screen where warranted.

Record performance issues and require corrective action, suspend work or terminate the relationship where justified.

- Do not claim every supplier has been independently audited unless this has actually occurred.

4. Responsibilities

Requesting teams provide accurate information about the supplier and proposed engagement.

Procurement or the nominated reviewer completes and records checks. Payment approvers verify invoices against approved contracts and delivered work.

Management approves high-risk exceptions and ensures the rationale is documented.

5. Records and review

- Retain onboarding forms, risk ratings, screening results, references, approvals, contracts, performance reviews and corrective actions.

Review high-risk relationships more frequently than low-risk ones. Review this policy annually and after a material incident or change in risk profile.

Related guidance

A risk-based questionnaire or desktop review is not equivalent to an on-site audit or independent assurance engagement.

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