

FY25 ESG DATA PACK

Introduction and contents



This data pack is an accompaniment to Spark's FY25 annual reporting disclosures. It includes our GRI Index table and additional voluntary detailed ESG data disclosure against a number of social and environmental metrics. It also incorporates employee and climate reporting data included in our integrated Annual Report and Climate-related Disclosures Report.

Contents

GRI Index

List of GRI topics Spark is reporting against, with reference to location of disclosures

Social Data

Detailed employee data
Community and volunteering data

Environmental Data

Waste, recycling, water use
Scope 1 / 2 / 3 emissions data
Energy use

Spark's FY25 Annual Reporting suite of documents

FY25 Annual Report



Key sections related to ESG disclosure

- **How we create value:** our Integrated Reporting value creation model
- **Our customers:** includes topics such as privacy, cybersecurity
- **Our network and technology:** includes investment in infrastructure and resilience
- **Our environment:** includes our approach to environmental management, waste, recycling/water
- **Our communities:** includes our approach to digital equity, employee volunteering, Spark Foundation
- **Our people:** includes diversity and inclusion, health safety and wellbeing, training and development
- **Governance and ESG Governance:** includes our approach to integrating ESG/sustainability across Spark
- **Sustainability appendix:** includes materiality approach / matrix, stakeholder engagement

FY25 Climate-related Disclosures Report

Prepared in compliance with the Aotearoa New Zealand Climate Standards



FY25 Modern Slavery and Human Rights Statement

Prepared in accordance with the requirements of the Australian Modern Slavery Act 2018



FY25 Corporate Governance Statement

Reporting against the requirements of the NZX Corporate Governance Code (NZX Code)



FY25 ESG DATA PACK

GRI table



Spark New Zealand has reported in accordance with the GRI Standards for the period 1 July 2024 to 30 June 2025. Our reporting uses GRI 1: Foundation 2021.

GRI standard	Disclosure	Location	Notes
GRI 2: General Disclosures 2021	2-1 Organisational details	FY25 Annual Report: Page(s) 2, 3,	
	2-2 Entities included in the organisation's sustainability reporting	FY25 Annual Report: Page(s) 77, 118	The boundaries and scope of our sustainability reporting matches that of our financial statements, covering all activities covered under our consolidated financial reporting.
	2-3 Reporting period, frequency and contact point	FY25 Annual Report: Page(s) 1, 132	We report annually, aligned with our financial reporting.
	2-4 Restatements of information	FY25 Climate-related Disclosures Report: Page(s) 30	Related to rebaselining scope 3 emissions reporting
	2-5 External assurance	FY25 Climate-related Disclosures Report: Page(s) 44 - 47	Our GHG Inventory Report is externally assured, with oversight from the Board and Leadership Squad.
	2-6 Activities, value chain and other business relationships	FY25 Annual Report: Page(s) 2, 3	
	2-7 Employees	FY25 Annual Report: Page(s) 40 - 45 FY25 ESG Data Pack: Social data	
	2-8 Workers who are not employees	FY25 Modern Slavery and Human Rights Statement: Page(s) 21 - 22	
	2-9 Governance structure and composition	FY25 Annual Report: Page(s) 20 - 23, 54 - 68	
	2-10 Nomination and selection of the highest governance body	FY25 Corporate Governance Statement	
	2-11 Chair of the highest governance body	FY25 Annual Report: Page(s) 20	Our Chair is a non-executive director
	2-12 Role of the highest governance body in overseeing the management of impacts	FY25 Annual Report: Page(s) 64 - 68	
	2-13 Delegation of responsibility for managing impacts	FY25 Annual Report: Page(s) 64 - 68 FY25 Climate-related Disclosures Report: Page(s) 44 - 47	
	2-14 Role of the highest governance body in sustainability reporting		Our GRI disclosures are included in our integrated Annual Report, Modern Slavery and Human Rights Statement, and Climate-related Disclosures Report, which are reviewed and approved by our Board and Leadership Squad.
	2-15 Conflicts of interest	FY25 Corporate Governance Statement	
	2-16 Communication of critical concerns	FY25 Annual Report: Page(s) 64 - 68 FY25 Modern Slavery and Human Rights Statement: Page(s) 21 - 22	
	2-17 Collective knowledge of the highest governance body	FY25 Annual Report: Page(s) 55 FY25 Climate-related Disclosures Report: Page(s) 4 FY25 Corporate Governance Statement	
	2-18 Evaluation of the performance of the highest governance body	FY25 Corporate Governance Statement	
	2-19 Remuneration policies	FY25 Annual Report: Page(s) 46 - 52	
	2-20 Process to determine remuneration	FY25 Annual Report: Page(s) 46 - 52	
	2-21 Annual total compensation ratio	FY25 Annual Report: Page(s) 46 - 53	We do not publish median salary. CEO remuneration is reported on pages 50 - 52 of the FY25 Annual Report.
	2-22 Statement on sustainable development strategy	FY25 Annual Report: Page(s) 9, 64 - 68 FY25 Modern Slavery and Human Rights Statement: Page(s) 4	
	2-23 Policy commitments	FY25 Modern Slavery and Human Rights Statement	
	2-24 Embedding policy commitments	FY25 Annual Report: Page(s) 64 - 68 FY25 Modern Slavery and Human Rights Statement: Page(s) 16 - 23	
	2-25 Processes to remediate negative impacts	FY25 Modern Slavery and Human Rights Statement: Page(s) 16 - 23	
	2-26 Mechanisms for seeking advice and raising concerns	FY25 Modern Slavery and Human Rights Statement: Page(s) 14	
	2-27 Compliance with laws and regulations	FY25 Annual Report: Page(s) 54	

GRI standard	Disclosure	Location	Notes
	2-28 Membership associations	FY25 Annual Report: Page(s) 129	
	2-29 Approach to stakeholder engagement	FY25 Annual Report: Page(s) 128	
	2-30 Collective bargaining agreements		<1% of employees are covered by collective bargaining agreements
GRI 3: Material Topics 2021	3-1 Process to determine material topics	FY25 Annual Report: Page(s) 126	
	3-2 List of material topics	FY25 Annual Report: Page(s) 126 - 127	
	3-3 Management of material topics	This is described topic-by-topic – refer to topic-specific disclosures below	
Topic standards			
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	FY25 Climate-related Disclosures Report: Page(s) 14 - 23	
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	FY25 Annual Report: Page(s) 28 - 31 FY25 Climate-related Disclosures Report: Page(s) 14 - 15	
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	FY25 Annual Report: Page(s) 54	
GRI 207: Tax 2019	207-1 Approach to tax	FY25 Annual Report: Page(s) 63	
GRI 305: Emissions 2016	305-1 Direct (scope 1) GHG emissions	FY25 Climate-related Disclosures Report: Page(s) 32	
	305-2 Energy indirect (scope 2) GHG emissions	FY25 Climate-related Disclosures Report: Page(s) 32	
	305-3 Other indirect (scope 3) GHG emissions	FY25 Climate-related Disclosures Report: Page(s) 33	
	305-5 Reduction of GHG emissions	FY25 Climate-related Disclosures Report: Page(s) 28 - 29	
GRI 306: Waste 2020	306-2 Management of significant waste-related impacts	FY25 Annual Report: Page(s) 36 FY25 ESG Data Pack: Environment data	
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	FY25 Modern Slavery and Human Rights Statement: Page(s) 16 - 21	
	308-2 Negative environmental impacts in the supply chain and actions taken	FY25 Modern Slavery and Human Rights Statement: Page(s) 20	
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	FY25 Annual Report: Page(s) 40 - 45 FY25 ESG Data Pack: Social data	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	FY25 ESG Data Pack: Social data	
	401-3 Parental leave	FY25 ESG Data Pack: Social data	
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	FY25 Annual Report: Page(s) 42	
	403-9 Work-related injuries	FY25 Annual Report: Page(s) 42	
GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	FY25 Annual Report: Page(s) 40 - 42	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	FY25 Annual Report: Page(s) 45, 55	
	405-2 Ratio of basic salary and remuneration of women to men	FY25 Annual Report: Page(s) 45	
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	FY25 Modern Slavery and Human Rights Statement: Page(s) 16 - 21	
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	FY25 Modern Slavery and Human Rights Statement: Page(s) 16 - 21	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	FY25 Modern Slavery and Human Rights Statement: Page(s) 16 - 21	
	414-2 Negative social impacts in the supply chain and actions taken	FY25 Modern Slavery and Human Rights Statement: Page(s) 16 - 21	
GRI 415: Public Policy 2016	415-1 Political contributions	FY25 Annual Report: Page(s) 84	
GRI 417: Marketing and Labelling 2016	417-3 Incidents of non-compliance concerning marketing communications	FY25 Annual Report: Page(s) 54	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	FY25 Annual Report: Page(s) 26	

FY25 ESG DATA PACK

Social data



The *Our people* section of our FY25 Annual Report includes commentary on our management of material employee topics, including commentary on year-on-year performance against key metrics including employee diversity and gender pay gap

The *Our communities* section of our FY25 Annual Report includes commentary on our management of material community/social topics, including commentary on year-on-year performance against key metrics including digital equity KPIs

Gender composition by role (with headcounts)¹

	Number of people	Gender ²				Age			
		Female %	Male %	Female #	Male #	Gender diverse ⁵	Under 30	30-50 years	Over 50 years
Directors	7	57%	43%	FY25: 4	FY25: 3		0%	14%	86%
	-1	-6%	6%	FY24: 5	FY24: 3		No change	No change	No change
Leadership Squad ³	10	50%	50%	FY25: 5	FY25: 5		0%	50%	50%
	-1	-5%	5%	FY24: 6	FY24: 5		No change	-5%	5%
Other leadership roles ⁴	62	45%	55%	FY25: 28	FY25: 34		0%	58%	42%
	-10	2%	-2%	FY24: 31	FY24: 41		-2%	0%	2%
Permanent starters	397	48%	52%	FY25: 189	FY25: 208		38%	55%	7%
	-447	9%	-7%	FY24: 330	FY24: 497		5%	-1%	-4%
Permanent leavers	1,489	29%	71%	FY25: 437	FY25: 1,050		4%	67%	28%
	514	-9%	11%	FY24: 369	FY24: 583		-24%	14%	10%
Total⁵	4,049	35%	65%	FY25: 1,405	FY25: 2,576	FY25: 10	15%	59%	26%
	-1,249	1%	-1%	FY24: 1,778	FY24: 3,435	FY24: 16	-2%	2%	0%

¹ The "20" in the 40:40:20 ratio refers to the remaining portion of a group or team that can be filled by any gender including male, female, non-binary, and other gender identities, allowing for further diversity and inclusion beyond the 40/40 split.

² For the purposes of NZX Listing Rule 3.8.1(c) no directors or members of the Leadership Squad self-identify as gender diverse.

³ Includes the CEO who is also included as a Director in the line above. The Leadership Squad is considered 'senior managers' for the purposes of the Financial Markets Conduct Act 2013 and 'senior executives' for the purposes of the ASX Corporate Governance Council's Principles and Recommendations.

⁴ Substantive roles that report directly to members of the Leadership Squad.

⁵ Includes non-executive directors. Spark's employee headcount, including our CEO, is reported as 4,043.

Reducing our gender pay gap

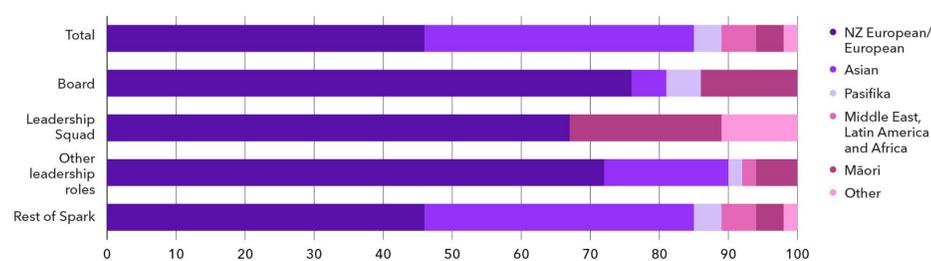
Category	Number of employees in category	Pay gap: mean ¹	Pay gap: median ²
Leadership: CEO, Leadership Squad and substantive roles that report directly to members of the Leadership Squad	FY25: 72 (39 Male, 33 Female)	FY25: 4%	FY25: 18%
	FY24: 83 (46 Male, 37 Female)	FY24: -1%	FY24: 19%
Technology: employees who work in technology-focused areas of the business	FY25: 2,001 (1,552 Male, 449 Female)	FY25: 10%	FY25: 14%
	FY24: 2,728 (2,081 Male, 647 Female)	FY24: 12%	FY24: 20%
Customer Channels: people primarily employed within our contact centres and retail operations	FY25: 791 (394 Male, 397 Female)	FY25: 3%	FY25: 0%
	FY24: 820 (418 Male, 402 Female)	FY24: 0%	FY24: 0%
Rest of Spark: including corporate, product, marketing, and customer units	FY25: 1,117 (591 Male, 526 Female)	FY25: 18%	FY25: 18%
	FY24: 1,582 (890 Male, 692 Female)	FY24: 16%	FY24: 17%
Total³		FY25: 11%	FY25: 23%
		FY24: 12%	FY24: 22%

¹ Pay Gap = (mean male salary - mean female salary)/mean male salary

² Pay Gap = (median male salary - median female salary)/median male salary

³ Gender diverse individuals and those who have not provided or prefer not to disclose their gender were excluded from the analysis. Calculated using hourly On Target Earnings or Total Base Remuneration plus Short-Term Incentive Target values as at 30 June 2025.

Ethnic representation



Percentages based on permanent and fixed-term employees at Spark; employees as of 30 June 2025 who had provided ethnicity data (n=3179). NZ European/European includes all European ethnicities (e.g. British, German) and Australian European. Spark collects information on main and other ethnicity where an individual identifies with more than one ethnicity. Consistent with the Champions for Change methodology, where an individual reports more than one ethnicity these are represented equally (e.g. two ethnicities represented as 0.5 each).

Employment type by gender and region

Employee types	Total		Auckland		Wellington		Christchurch		Other region		Total
	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	
Contract type											
Permanent Full-time	1,187	2,433	643	1,321	184	434	200	349	160	329	57
Permanent Part-time	199	126	50	43	22	14	45	14	82	55	5
Temporary Full-time	14	13	11	6	1	5	2	-	-	2	-
Temporary Part-time	5	4	3	2	-	-	-	-	2	2	-
Casual	3	2	2	1	-	1	1	-	-	-	-
Total	1,408	2,578	709	1,373	207	454	248	363	244	388	62

Parental leave

Spark's parental leave offering is for eligible employees regardless of gender, sexuality, age or whether the employee is giving birth or adopting a child.

Spark tops-up the Government's parental leave contributions so that primary carers receive 100% of their normal salary for 26 weeks, with continued employer KiwiSaver contributions of 3% during their parental leave period.

Secondary carers also receive four weeks' paid leave (increased from two), so they can be present to support their partner and whānau during those pivotal first few weeks of their baby's life.

The package also includes a phased return to work policy for primary carers, who can work 80% of their regular hours on 100% salary for the first three months of their return.

FY25 parental leave numbers	Female	Male ¹
Employees who took parental leave	141	8
Employees who returned to work after taking parental leave	82	6
Employees who returned to work after taking parental leave that remain employed 12 months after their return to work	51	1
Return to work rate ²	95%	86%
Retention rate ³	66%	100%

¹ Males who took fewer than 30 days paternity leave have been excluded.

² Return to work rate = total number of employees who returned to work after parental leave, divided by the total number of employees due to return to work after taking parental leave.

³ Retention rate = total number of employees retained 12 months after returning to work following a period of parental leave, divided by the total number of employees returning from parental leave in the prior reporting period.

Spark Give

Our payroll giving programme, Spark Give, enables our people to donate to schools and charities via their pay. Spark matches donations towards our four key partners through Spark Give dollar-for-dollar (up to a cap of \$250,000 per year).

Our people also have the option to donate to their personal causes, and Spark continued to match most registered charities dollar-for-dollar (up to \$500 per person per year, up to a total of \$50,000 per year).

In FY25 Spark Give donations included:

Spark Give donations	FY24	FY25
Employee donations	\$307,497	\$278,031
Spark's matching	\$47,622	35,618
Number of employees participating	342	224

Spark Volunteer

Spark employees can take one volunteer day each year, for skills or mission-based volunteering. Skill-based volunteering means our people focus on opportunities to use their specialised skills and talents to assist not-for-profits. Mission-based volunteering means volunteering with organisations whose work aligns with digital equity.

Some of the organisations our people volunteered with over the year include City Mission in Auckland and Christchurch, SPCA, YMCA, Hospice, Salvation Army, Pink Ribbon, ShadowTech Day, and Clothe Our Kids. This also includes various rest homes, schools, and beach and reserve cleanups across the country.

In FY25 volunteer leave days were as follows:

Spark volunteer days	FY24	FY25
Total staff eligible for volunteering	5,291	4,043
Total employee participation	610 days	541 days
% of employee participation	12%	14%

Employee benefits

The following table sets out benefits provided to employees during FY25 by employee group.¹

	Full-time permanent employees	Part-time permanent employees	Fixed-term / casual employees
Parental leave	Yes	Yes	Yes ²
Insurance cover			
Medical			
Life and terminal illness	Yes	Yes ³	No
Income protection			
Trauma			
Spark account credit ⁴	Yes	Yes	No
Ability to participate in Spark Share ⁵	Yes	Yes	No
Volunteer day ⁶	Yes	Yes	No
Spark Give ⁷	Yes	Yes	No ⁸
Eligibility to join Marram ⁹	Yes	Yes	No
Eligible for purchased leave ¹⁰	Yes	Yes	No
NZ Herald Premium subscription	Yes	Yes	No
Mahi Tahī – wellbeing support ¹¹	Yes	Yes	Yes

¹ Excludes benefits offered to some subsidiaries, which differ from Spark's overall benefits suite.

² Eligibility for Parental Leave is in accordance with Government legislation.

³ Employees must work at least 15 hours a week to be eligible.

⁴ Employees with active Spark mobile or broadband accounts will receive monthly credits of \$120, which can be used towards Spark products or services.

⁵ Spark's employee share purchase scheme provide a simple and cost effective way for Spark NZ employees to acquire discounted shares through an interest free loan paid off over three years, giving employees a real stake in the future success of the company.

⁶ The opportunity for Spark employees to take a day of paid volunteer leave.

⁷ For specific charities, Spark will match employee donations dollar-for-dollar, up to a \$500 annual matching cap.

⁸ Casual employees are ineligible.

⁹ Marram Trust offers access to accommodation across New Zealand for discounted rates, as well as providing a basic level of healthcare cover.

¹⁰ The ability to purchase additional annual leave via a deduction of base salary.

¹¹ Wellbeing support includes access to Clearhead including funded therapy sessions, specialist clinical support from our in-house psychotherapist and health psychologist, and subscription to the Take A Breath Platform.

FY25 ESG DATA PACK

Environmental data

Please refer to our FY25 Climate-related Disclosures Report for detailed disclosure on our approach to C published in compliance with the New Zealand Climate Standards. It includes our climate-related risks and performance against our climate targets.

The FY25 Climate Related Disclosures report also includes our FY25 GHG Inventory Report as an Appendix.

The *Our environment* section of our FY25 Annual Report includes commentary on other environmental targets and on year-on-year performance against key metrics. □

Device recycling

	FY22	FY23	FY24	FY25
Number of phones collected for recycling	20,609	14,913	16,425*	20,828*
Number of modems collected for recycling	not reported	not reported	10,202	11,225

* Data from FY24 onwards includes devices collected via trade-in schemes

Water usage at selected sites

	FY22	FY23	FY24	FY25
Water consumption KL (1000 litres)	not reported	not reported	not reported	14,667

* Includes water data from our four largest sites by energy consumption, covering ~65% of data centre energy use

Network/electronic waste (tonnes)

Waste collected (tonnes)	FY22	FY23	FY24	FY25
E-waste collected	151	154	151	207
Network waste metals recovered	394	405	299	364
Combined e-waste / network waste	545	559	450	571