



Electricity Retail Authorisation Application

Introduction

This is an application by Euroka Energy Pty Ltd for a retail authorisation for the sale of electricity in those states that have adopted the National Energy Consumer Framework.

Euroka Energy is involved in all facets of renewable energy. The business model of Euroka Energy is to develop green field sites to an approved status that will enable a third party Renewable Energy Fund to construct a Large Scale Solar Farm.

Euroka Energy is requesting authorisation to retail electricity to Commercial and Industrial (**C&I**) Customers that consume greater the 100MWh on an annual basis. It is the opinion of Euroka Energy that by fully understanding the consumption profile of the customers, we will be in a better position to choose C&I Customers whose consumption profile matches that with the generation profile of the PPAs that Euroka Energy intends to enter into. Together this will provide a competitive retail product and assist in managing the wholesale risk of Euroka Energy.

[REDACTED]

To assist the Australian Energy Regulator (**AER**) in its review of this application, below we provide answers to each of the criteria set out in the Retail Authorisation Guideline and accompanying checklist.

Euroka Energy Pty Ltd is an Australian proprietary company limited by shares. This application consists of the following:

- **Part One** of this document provides the Required Information: general particulars;
- **Part Two** of this document provides the Required Information: organizational and technical capacity;
- **Part Three** of this document provides the Required Information: financial resources;
- **Part Four** of this document provides the Required Information: suitability; and
- **Attachments** to this document, as referenced throughout.

Documents marked as 'Commercial in Confidence' do not form part of the public component of this application. Documents will be marked as such if proprietary to the application or if they contain legally privileged, copyright or commercially sensitive material.

1. **Part One: Required information – general particulars**

	Required information	Response from Euroka Energy Pty Ltd
1	Fuel type Please enter either Electricity (E), Gas (G) or Dual (D)	Electricity
2	Existing or Start-up business	Start Up. Please refer to Annexure B4 (ASIC Extract).
3	Confidential documents - Please enter either - Yes or No	Confidential documents are identified as such in the annexure table.
4	Your legal name	Euroka Energy Pty Ltd
5	Your trading name if different to your legal name	Not applicable
6	ABN or ACN	ABN: 67 658 935 105 ACN: 658 935 105
7	A registered business address and address for correspondence	Suite 2A, Level 2 2/17 Edgar Street Belmont NSW 2281
8	A nominated contact person, including their position in the organisation and contact details	Name: Mark Marjoribanks Position: Chief Executive Officer [REDACTED] [REDACTED]
9	The date you intend to commence retailing energy	31/01/2024
10	The nature and scope of operations proposed (business model and size of operations, volume of customers)	large consumers of electricity (over 100MWh or as otherwise defined in each relevant jurisdiction)
11	The jurisdictions in which you intend to retail energy	NSW, QLD, SA, TAS, ACT
12	The type of customers you intend to supply (for example, small customers, small market offer customers or large customers as defined in s. 5 of the Retail Law)	Large commercial.

2. **Part Two: Required information – organizational and technical capacity**

2.1 **Details of previous experience as an energy retailer (Criterion 1 to 6)**

Criterion	Required information	Response from Euroka Energy Pty Ltd
Criterion 1	Details of your (or any related parties)	At present the business of Euroka Energy is developing Utility Scale Solar Farms

	<p>previous experience as an energy retailer</p>	<p>that by installing solar photovoltaic systems with Battery Energy Storage Solutions on sites owned by Euroka Energy at various rural properties and selling electricity directly to the Australian Electricity Market. Euroka Energy intends to sell these utility scale solar farms to varying renewable funds and purchase the energy back through power purchase agreements.</p> <p>As stated above, Euroka Energy is a company focussed on renewable generation, we intend to compete by becoming a mini Gentaileer.</p> <p>The applicant has engaged individuals and suppliers with significant experience in the energy market. Please refer to the applicant's business plan Annexure B1. Please refer to the applicant's resourcing plan (Annexure B5).</p> <p>The hiring of the applicant reflects its assessment regarding required capability, as noted above. The individuals hired or engaged by the applicant have worked in or for energy retailers and including in energy compliance and risk management. Compliance and risk management have been identified as key areas of concern by Euroka Energy Pty Ltd. Please refer to the applicant's resourcing plan (Annexure B5) and the applicant's HR Policy (Annexure C15).</p> <p>Attached are details of all providers and individuals involved in Euroka Energy Pty Ltd (Annexures A1-A17). A company structure diagram is provided in Annexure A18.</p> <p>The same shareholders in ASFCQ1 Pty Ltd to ASFCQ8 Pty Ltd hold identical shareholding in Euroka Energy. The group of ASFCQ1-8 companies are the companies that the respective solar developments and solar acquisitions are</p>
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		being performed in. Brave Pty Ltd is the regulated billing company that will provide the billing and reconciliation services for Euroka Energy.
1.1	The date and location of previous operations (this should include related entities (if applicable))	Please refer to Annexure A for further details on previous operation of the individuals engaged by Euroka Energy.
1.2	The form/s of energy sold	Electricity
1.3	The scale of operations (including the number and size of customers)	Individuals within the business have direct energy retail experience.
1.4	A description of how the retail activities were conducted	Please refer to Annexures A1 to A13.
Criterion 2	Details of any other relevant retail or energy market experience	Please see attached the relevant CVs for: <ul style="list-style-type: none"> • Annexure A2 Mark Marjoribanks • Annexure A4 Tania Weinert • Annexure A6 John Farmer • Annexure A1 Daniel Huang • Annexure A18 Kim Essex • Annexure A19 Melissa Rudzinski
Criterion 3	Where you do not have previous energy market experience, how you intend to bring this experience into your business	
Criterion 4	An organisation chart showing the structure of your organisation (this should include Board members and Operational Managers)	Refer to Annexure A7.
Criterion 5	The number of employees, broken down by business unit or other relevant classification (are employees shared with any other entities)	Euroka Energy employs its own staff. Please refer to Annexures A1 to A6. Under the current Organisational Chart (Annexure A7- noting the addition of Kim Essex in Compliance), there will be [6] employees broken up into the following business units: <ul style="list-style-type: none"> • Management- Mark Marjoribanks, Tania Weinert, Daniel Huang • Risk and Compliance- Tania

		<p>Weinert and Kim Essex</p> <ul style="list-style-type: none"> • Sales – John Farmer • Administration- Melissa Rudzinski
Criterion 6	A summary of qualifications, technical skills and experience of your officers, and the relevance of those skills and experience to meeting the requirements of the retailer authorisation (this may include a CV)	<p>Refer Annexures A1 to A13. Please refer to the org chart in Annexure A6.</p> <p>Please see CVs for relevant employees for further information regarding their skills and experience.</p> <ul style="list-style-type: none"> • Annexure A2 Mark Marjoribanks – CEO • Annexure A4 Tania Weinert – COO • Annexure A6 John Farmer – Business Development • Annexure A1 Daniel Huang - CFO • Annexure A18 Kim Essex- Compliance Manager • Annexure A19 Melissa Rudzinski- Office Manager

2.2 Third party involvement (Criterion 7)

Criterion from Guideline	Required information	Response from Euroka Energy Pty Ltd
Criterion 7	Where you may be relying on a third party to provide staff and resources to meet the technical requirements of your retailer authorisation or to perform retail roles (such as operating phone centres or billing), you must -	
7.1	State all functions and activities you propose to outsource	<p>The meter coordinator functions will be outsourced to Yurika.</p> <p>Capability of Yurika</p> <p>Yurika, part of Energy Queensland Pty Ltd, offers a broad range of metering solutions specifically tailored for the Australian energy market. These solutions are designed to provide market operators,</p>

		<p>energy retailers, local network service providers, energy brokers, and large business customers with data insights that can drive informed decisions and business transformation.</p> <p>Key aspects of Yurika's metering capabilities include:</p> <p>NEM Type 1-4 Metering Services: As an accredited Metering Coordinator (MC), Meter Provider (MP) and Meter Data Provider (MDP) for Type 1-4 metering services, Yurika can install, commission, gather, and verify data remotely from meters within the National Electricity Market (NEM). Their services include the provision, installation, and maintenance of compliant metering within the NEM Type 1-4 category.</p> <p>Multi-utility Sub-metering: Yurika offers multi-utility sub-metering solutions that gather accurate energy and utility information to assist in understanding consumption across sites. This can include the measuring of electricity, gas, and water usage for specific components, areas, or outcomes.</p> <p>Bill Validation: Yurika uses data from its multi-utility sub-meters to validate utility accounts and ensure correct charging by electricity retailers or water and gas utilities.</p> <p>Ancillary Metering Solutions: This includes output pulsing & SMARTHUB modbus outputs, Current Transformer (CT) and Voltage Transformer (VT) Testing Services, and High Voltage Design Review and Compliance.</p> <p>Data and Analytics Solutions: Yurika provides a range of data visualisation, analytics, and reporting products. These solutions can enable customers to better manage their utility and energy</p>
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		<p>consumption through cost-effective solutions suitable for various information needs, resources, and IT requirements.</p> <p>The Billing and Customer Support function will be outsourced to Brave Energy Systems. An agreement is being negotiated and finalised.</p> <p>Capability of Brave Systems</p> <p>Brave Energy Systems offers a suite of advanced software products tailored for the Australian energy sector. These solutions cater to retailers, metering service providers, and networks, providing powerful tools for improving efficiency, accuracy, and speed in managing energy data.</p> <p>The company's software solutions, known as RX Suite for Retailers, MX Suite for Metering, and NX Suite for Networks, have specific capabilities related to energy billing.</p> <p>For Retailers, the RX Billing component of the RX Suite offers a powerful billing engine that's simple to use. Brave RX identifies revenue leakages and helps reduce operational costs, thereby protecting the bottom line.</p> <p>For Metering service providers, the MX Suite includes a dedicated product range that resolves revenue leakage in the long term. The suite provides comprehensive coverage to ensure accurate and efficient billing processes.</p> <p>Brave also offers managed services and a Software-as-a-Service (SaaS) platform, Bravecloud, which further aids in automating and streamlining the billing process, ensuring high performance, reliability, and compliance with market standards and regulations.</p>
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		<p>Regulatory compliance will be managed in-house and support will be obtained from Compliance Quarter.</p> <p>Compliance Quarter</p> <p>Compliance Quarter specializes in providing regulatory compliance services to businesses operating in the energy sector. They offer a unique blend of energy expertise, regulatory knowledge, and advanced systems to help clients navigate complex regulatory environments.</p> <p>Their services include a virtual compliance officer service that ensures clients are updated on regulatory changes and are implementing a compliance management program. They customize each engagement to meet the specific needs of their clients. This can involve reviewing their businesses, determining the resources needed for compliance, and providing resources such as documents, online training, processes, policies, and procedures.</p> <p>Compliance Quarter also assists clients in running Compliance Committees, where new and existing regulatory obligations are considered, and improvements made to client's compliance programs.</p> <p>Their unique offering is Compliance HUB, a centralized Software-as-a-Service (SaaS) product where obligations are identified and managed. This platform features dynamic risk-based assessment of regulatory obligations, automated document review, a policy and procedure 'vault' with automatic version control, and scenario-based video training for front-line staff.</p> <p>Compliance Quarter works with a wide range of stakeholders, including energy regulators, financial services regulators,</p>
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		top-tier law firms, and innovative energy businesses. Their focus is on the evolving energy market, and they thrive on applying existing regulatory frameworks to new and interesting business models.
7.2	Provide a summary of the third party's experience in, and knowledge of, the relevant area	Please refer to the attached capability statements (Annexures A8, A15, and A17).
7.3	Provide evidence of the third party's technical capacity to meet relevant obligations	Please refer to the attached capability statements (Annexures A8, A15 and A17).
7.4	Provide evidence of controls in place to ensure the third party's compliance with the Retail Law and Retail Rules (this may include contracts, deeds and/or policies with other parties)	<p>Euroka Energy has a comprehensive Third Party Management Policy to oversee the services provided by third-party vendors, ensuring adherence to regulatory compliance under the Retail Law and Rules. This policy includes several steps, as outlined in the Third Party Management Policy, the Third-Party Due Diligence for Regulatory Compliance Process, and the Third-Party Compliance Monitoring and Reporting Process documents. Please refer to Annexures C11 to C13.</p> <p>Third-Party Risk Management Plan: Euroka Energy has implemented a third-party risk management plan to manage the relationships with third-party vendors and ensure compliance with obligations under the Retail Law and Rules (source: Third-Party Compliance Monitoring and Reporting Process).</p> <p>Selection of Third-Party Suppliers: The process involves identifying and defining the need for a third-party vendor, determining the attributes or experience required, and looking for suitable vendors who can fulfill the requirements (source: Third-Party Compliance Monitoring and Reporting Process).</p> <p>Due Diligence: Before entering into a contract with a third-party vendor, Euroka Energy conducts a comprehensive due</p>

	<p>diligence process. This includes the assessment of the vendor's systems, policies, licences, expertise, privacy measures, incident reporting mechanisms, training protocols, insurance coverage, and other relevant aspects (source: Third Party Due Diligence for Regulatory Compliance Process).</p> <p>Ongoing Monitoring: The Compliance Officer monitors the services provided by the third-party vendors regularly to ensure adherence to the Retail Law and Rules. This involves analysing the quality of service delivery, assessing performance against agreed terms, and verifying the implementation of corrective actions post any identified breaches (source: Third-Party Compliance Monitoring and Reporting Process).</p> <p>Breach Reporting: In case of any breach of obligations by the third-party vendors, the Compliance Officer documents the breach details and reports them to the senior management (source: Third-Party Compliance Monitoring and Reporting Process).</p> <p>Regular Reporting: The Compliance Officer prepares and presents a comprehensive report to Euroka Energy's board and senior management on a regular basis. This report includes results of the internal control testing, ongoing monitoring of third-party vendors, any identified breaches, and actions taken (source: Third-Party Compliance Monitoring and Reporting Process).</p> <p>Contractual Agreement: The contract with the third-party vendor clearly states all regulatory compliance requirements, including provisions for regular audits and reviews, incident reporting, data privacy, and breach penalties (source: Third-Party Compliance Monitoring and Reporting Process).</p>
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		<p>Review of Third-Party Vendor Procedures: In case of serious compliance breaches by a third-party vendor, the Compliance Officer ensures that the relevant third-party vendor policies and procedures are updated or amended to prevent reoccurrence of the breach (source: Third-Party Compliance Monitoring and Reporting Process).</p> <p>Termination: Euroka Energy may terminate the contract with the third-party vendor in accordance with the individual contract terms, ensuring a smooth transition of the services being undertaken by the third-party (source: Third Party Due Diligence for Regulatory Compliance Process).</p> <p>Documentation and Reporting: Euroka Energy documents and reports on its third-party risk management process and specific arrangements throughout their lifecycle. Proper documentation facilitates accountability, monitoring, and risk management associated with third parties (source: Third Party Due Diligence for Regulatory Compliance Process).</p>
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Please refer to **Annexure A1-A7** provided on a commercial in confidence basis for details on all providers and individuals involved in Euroka Energy Pty Ltd.

2.3 Business plan (Criterion 9)

Please refer to **Annexure B1** provided on a commercial in confidence basis, a copy of the applicant's business plan. The assumptions made for the forecasts are contained in the Energy Financial Models detailed at Annexures F19 – F23.

2.4 Compliance strategy (Criterion 9)

Euroka Energy Pty Ltd is committed to an effective compliance program implemented in accordance with AS/ISO 19600:2015. Euroka Energy Pty Ltd's Compliance Policy (Annexure C2), demonstrates the extent to which the standard has guided Euroka Energy Pty Ltd.

Euroka Energy Pty Ltd understands and will implement a range of measures to ensure compliance with regulatory obligations. The applicant's regulatory obligations include those under Energy Law (including the National Energy Retail Law, National Energy Retail Regulations and various Victorian instruments), the

Telecommunications Act 1997, the *Do Not Call Register Act 2006* and the Australian Consumer Law (as set out in Schedule 2 to the *Competition and Consumer Act 2010*). A detailed list of regulatory obligations applicable to the applicant is attached and marked Annexure C7, provided on a commercial in confidence basis.

The board of Euroka Energy Pty Ltd has overall responsibility for setting and overseeing the corporate governance and compliance standards that are implemented by the Compliance Committee consisting of a member of the board, our Compliance Lead and business managers.

Ways that Euroka Energy Pty Ltd will ensure compliance include:

- The Compliance Committee: Responsible for developing and implementing the compliance program via the development of policies, procedures and training programs.
- Compliance Personnel: Responsible for the day to day oversight of the compliance program of Euroka Energy Pty Ltd.
- External Advice: Euroka Energy Pty Ltd, as part of its compliance program, obtains advice on compliance and legal issues from a number of qualified external providers.
- Information Technology: Euroka Energy Pty Ltd implements a range of technological solutions that aid in the Euroka Energy Pty Ltd's compliance and implementation of the compliance program. These include the Compliance HUB, a cloud-based system that tracks regulatory obligations and assigns various controls against obligations.
- Documentation: Euroka Energy Pty Ltd has developed procedures and policies related to operational processes in order to ensure regulatory compliance. These documents are provided to employees to ensure implementation of practices in compliance.
- Compliance Risk Assessments: Euroka Energy Pty Ltd actively seeks to identify and reduce the likelihood of breaches of regulatory obligations. A Compliance Risk Assessment will be conducted looking at applicable regulatory obligations, the consequences and likelihood of a breach and appropriate controls.
- Training and Assessment: The aim of compliance training and assessment is to reinforce in all staff the understanding that regulatory compliance is core to the applicant's operations. External training providers will be utilised where appropriate. Compliance Quarter will provide ongoing compliance training including using the Compliance HUB, in a face-to-face setting and via webinar.
- Qualified Staff: Appropriately qualified staff will be employed.
- Monitoring and Reporting: Any compliance breaches will be monitored, resolved and reported in accordance with the Plan and the applicant's reporting obligations.

Euroka Energy has two staff who will manage and implement our compliance program: Kim Essex and Tania Weinert. Kim Essex possesses an extensive background in electricity retail compliance, with over two decades of experience in

the energy sector in New South Wales. Her tenure at Mojo Power as an Operations Manager from June 2018 to May 2021 involved direct management of compliance-related projects, where she was tasked with developing and implementing compliance programs, conducting risk assessments, and ensuring adherence to industry standards. Kim's role required effective communication with regulatory bodies and stakeholders, and she was responsible for the ongoing implementation of processes that were responsive to regulatory changes and requirements.

Her earlier role at Sanctuary Energy as an Operations Officer also emphasized electricity retail compliance. From June 2010 to May 2018, Kim supported the executive team to enhance organizational efficiencies, managed compliance issues, ensured frontline service delivery, and oversaw customer channel management. She was also involved in liaising with the Ombudsman and Fair Trading.

In her current role as a Business Consultant, which she has held since May 2021, Kim continues to leverage her deep knowledge and expertise in the energy sector, providing strategic guidance on compliance management within the retail energy business. Her consulting work involves helping companies navigate the complex regulatory environment and ensuring that they remain up-to-date with evolving laws and regulations. Her CV underscores her capability in understanding and interpreting energy market rules, tariff structures, and licensing requirements to aid her clients in meeting their regulatory commitments.

Tania Weinert's résumé showcases her extensive experience in the solar industry and project management, particularly with a focus on renewable energy and the delivery of large-scale commercial solar projects. Her career demonstrates a strong track record in operational management, relationship building, and leadership, aligning with business development and customer service excellence.

At MMT Projects Pty Ltd, as the Managing Director since January 2021, Tania is responsible for the technical and financial performance of projects. She provides direction, oversight, and guidance to project engineers and contractors. She demonstrates her technical proficiency and leadership by ensuring the efficiency and success of renewable project management.

Prior to her current role, she served as a Project Manager at ERM Power Pty Ltd from June 2019 to January 2021, where she led the technical and financial aspects of projects. Tania was also responsible for strategic business focus, team leadership, and ensuring compliance with WHS, risk management, and contract management. Her role included strong stakeholder engagement, which was critical for the success of the Solpod rollout and other projects aimed at reducing carbon footprints for companies like Cleanaway.

As a Project Development & Design Officer with ARA Renewable Energy from April 2017 to June 2019, Tania demonstrated her strategic business acumen and strong communication skills. She was involved in business partnering and played a role in qualifying leads and opportunities, as well as complying with various legislations.

At Urth Energy Pty Ltd, Tania, as General Manager from March 2014 to February

2017, managed the Retail Billing and Customer Support Teams, negotiated with suppliers and contractors, and was involved in the implementation of a CRM system. Her experience here reflects her knowledge of retail electricity and project management skills.

Before her focus on the renewable energy sector, Tania owned and managed DTC Services from November 2006 to March 2013. She managed refurbishment projects for the Australian Navy and handled various administrative and management responsibilities.

Criterion from Guideline	Required information	Response
Criterion 9	Details of your compliance strategy	<p>Euroka Energy Pty Ltd's compliance strategy is underpinned by a robust Compliance Management System (CMS). Our CMS is central to our zero tolerance for regulatory and compliance risk and is integral to our operational processes, ensuring adherence to all applicable legislation, regulations, licence conditions, codes, guidelines, rules, and standards.</p> <p>Our strategy involves:</p> <p>Continuous Monitoring and Review: We are committed to ongoing monitoring and review of our compliance obligations, ensuring that our practices remain current and effective.</p> <p>Training and Awareness: We deliver appropriate training programs to our staff, particularly when major changes are introduced, to maintain a high level of awareness and understanding of compliance requirements.</p> <p>Active Industry Participation: Our staff actively participate in industry events and consultations, contributing to the development of new compliance obligations and an improved regulatory environment.</p> <p>Regular Reporting: The Compliance Officer prepares comprehensive reports for the board and senior management,</p>

		<p>including results of internal control testing, monitoring of third-party vendors, and any identified breaches with actions taken.</p> <p>External Consultation: We regularly engage with external consultants, including law firms and compliance professionals, for advice on compliance and legal issues, and we conduct third-party audits of our compliance policy and CMS at three-yearly intervals.</p> <p>IT and Documentation: Our IT services and billing systems are developed with regulatory compliance as a core requirement, and we maintain thorough documentation to support our compliance activities.</p> <p>Compliance Personnel: We have dedicated compliance personnel responsible for the day-to-day implementation and maintenance of the CMS.</p> <p>Compliance Committee: A compliance committee, formed by the Board, oversees the implementation of the compliance program, identifies new regulatory obligations, and ensures compliance.</p> <p>Breach Management and Reporting: We have a clear process for managing and reporting breaches, including immediate reporting to senior management and necessary regulatory reporting.</p> <p>Complaints Management: We review complaints management as part of our compliance monitoring, providing insights into customer issues and areas for improvement.</p> <p>Resource Allocation: Adequate resources are allocated to ensure compliance with all Applicable Law, with adjustments made as needed.</p>
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		<p>Policy Review: The Board reviews the compliance policy at least every two years to ensure its continued relevance and effectiveness.</p> <p>Please refer to the report of the independent auditor of our Compliance Program (Annexure C1) and verification letter (Annexure C21). Please also refer to: Annexure C3 Compliance Reporting Procedure, Annexure C2 Compliance Policy, and Annexure C13 Third-Party Compliance Monitoring and Reporting Process</p>
9.1	<p>Demonstrating your knowledge and understanding of the obligations imposed on authorised retailers under the Retail Law and Retail Rules and applicable statutory, industry and technical requirements of the jurisdictions in which you intend to operate</p>	<p>Euroka Energy Pty Ltd possesses a comprehensive understanding of the obligations imposed on authorised retailers under the Retail Law and Retail Rules, as well as the applicable statutory, industry, and technical requirements of the jurisdictions in which we intend to operate. Our knowledge is reflected in our meticulous approach to compliance, which is embedded in every aspect of our business operations.</p> <p>Our Compliance Management System (CMS) is tailored to ensure adherence to the National Energy Retail Law (NERL) and the National Energy Retail Rules (NERR), which set out the key legal requirements for energy retailers in the National Electricity Market (NEM). We are fully aware that these obligations cover a wide range of areas including customer contracts, billing, customer hardship, disconnections, and the provision of information to customers.</p> <p>In addition to the Retail Law and Retail Rules, Euroka Energy Pty Ltd is also committed to complying with relevant statutory requirements such as the Australian Consumer Law (ACL), which governs fair trading and consumer protection, and the Privacy Act 1988, which sets out how we must handle personal information.</p>

		<p>Our compliance strategy includes regular training for our staff to ensure they are well-versed in these obligations. We actively participate in industry events and consultations to stay abreast of regulatory changes and contribute to the development of a more favourable regulatory environment.</p> <p>We also maintain an Obligations Register as part of our CMS, which systematically identifies and documents our compliance obligations and the implications for our activities, products, and services. This register is reviewed continuously to ensure that it reflects the latest regulatory requirements.</p> <p>Furthermore, our Compliance Officer prepares regular reports for the board and senior management, which include updates on our compliance with the Retail Law and Rules, and any changes in the statutory, industry, and technical requirements of the jurisdictions we operate in.</p> <p>Euroka Energy Pty Ltd's commitment to compliance is further demonstrated by our engagement with external consultants and legal experts to ensure our understanding and application of the Retail Law, Retail Rules, and other statutory requirements are accurate and up-to-date.</p> <p>Please find attached to this application an Obligations Register that has been developed by our external consultants Compliance Quarter in Annexure C7. Please also refer to Annexure C5 Code of Ethics, Annexure B1 Euroka Energy Business Plan, Annexure C12 Third Party Due Diligence Process, Annexure C14 Customer Hardship Policy, Annexure C3 Compliance Reporting Procedure, Annexure C2 Compliance Policy, Annexure C13 Third-Party Compliance</p>
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		Monitoring and Reporting Process, and Annexure C8 Risk Management Policy.
9.2	Outlining how applicable retailer authorisation obligations and statutory, industry and technical requirements will be met (including how compliance breaches will be identified and remedied)	<p>Euroka Energy Pty Ltd is committed to meeting all applicable retailer authorisation obligations and statutory, industry, and technical requirements through the implementation of our robust Compliance Management System (CMS). Our approach to compliance is proactive and systematic, ensuring that we identify and remedy any breaches promptly and effectively.</p> <p>Identification and Remediation of Compliance Breaches:</p> <p>Continuous Monitoring: Our Compliance Officer conducts regular monitoring of our operations and the services provided by third-party vendors to ensure adherence to the Retail Law and Rules. This includes analysing service delivery quality, assessing performance against agreed terms, and verifying the implementation of corrective actions post any identified breaches.</p> <p>Breach Reporting: In the event of a breach, the Compliance Officer will immediately document the breach details and report to senior management. This includes the nature of the breach, impact, steps taken to rectify it, and preventive measures for the future. Reportable breaches will be reported to the relevant regulator as per the requirements.</p> <p>Regular Reporting: The Compliance Officer prepares regular reports for the board and senior management on internal control testing results, monitoring of third-party vendors, and any identified breaches with actions taken.</p> <p>Ongoing Training: We provide regular training to our staff to ensure they understand and can fulfil their compliance obligations. This includes updates when</p>

		<p>there are major changes to compliance requirements.</p> <p>Active Industry Participation: Our staff actively participate in industry events and consultations to stay informed of regulatory changes.</p> <p>Obligations Register: We maintain an Obligations Register that systematically identifies and documents our compliance obligations, which is continuously reviewed to reflect the latest regulatory requirements.</p> <p>External Consultation: We engage with external consultants and legal experts to ensure our understanding and application of the Retail Law, Retail Rules, and other statutory requirements are accurate and up-to-date.</p> <p>Compliance Committee Oversight: A compliance committee, formed by the Board, oversees the implementation of the compliance program, identifies new regulatory obligations, and ensures compliance.</p> <p>Complaints Management: We review complaints management as part of our compliance monitoring, providing insights into customer issues and areas for improvement.</p> <p>Please refer to Annexure C4 Complaints Policy, Annexure C12 Third Party Due Diligence Process, Annexure C3 Compliance Reporting Procedure C2 Compliance Policy, Annexure C13 Third-Party Compliance Monitoring and Reporting Process, Annexure C8 Risk Management Policy, and Annexure C11 Energy Retail Annexure Third Party Process.</p>
9.3	Including complaint and dispute resolution	Please refer to the attached Complaints Policy in Annexure C4.

	<p>procedures, developed in accordance with Australian Standard AS/NZS 10002:2014 (AS ISO 10002-2006) (Customer satisfaction— Guidelines for complaints handling in organisations).</p>	<p>Euroka Energy Pty Ltd has a comprehensive Complaints Policy to manage customer complaints effectively and ensure compliance with regulatory obligations. Here are the key elements of Euroka's approach to handling customer complaints:</p> <p>Complaint Definition: Euroka Energy defines a complaint as any expression of dissatisfaction regarding the products or services provided by the company, its agents, contractors, or other representatives, or due to perceived inadequacies in the complaint handling process itself.</p> <p>Complaints Management: The company treats all complaints as opportunities for improvement. The complaints are freely received by telephone, in writing, or in person. The complaints and all relevant information are recorded and given a unique identifier.</p> <p>Responsiveness: All complaints are immediately acknowledged, prioritised for resolution, and higher priority is given to complaints where there is financial hardship, the disconnection of energy supply, or matters relating to health and safety. The company also commits to keep complainants updated throughout the process.</p> <p>Responsibilities: All staff members of Euroka Energy are required to comply with the Complaints Policy, the Retail Law, and the Retail Rules. Complaints can be made to any Euroka Energy employee or contractor, who is then required to report any complaints received to the Office Manager (our customer service manager)</p> <p>Monitoring and Improving: Complaints are tracked at individual and group levels. Any systemic issues identified are</p>
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		<p>reported to the Compliance Committee and the board during their monthly meetings. The board directs top-level management to address systemic issues identified during a complaint process.</p> <p>Internal and External Escalation: At any time, the complainant may request an internal escalation of the complaint. Complaints will also be escalated where they are complex, urgent, or sensitive. If the complainant is not satisfied with Euroka Energy's response to the complaint, they can contact the Energy Ombudsman in their state.</p> <p>Recording Complaints: Complaints and all relevant information are recorded in Euroka Energy's customer management system as soon as they are received. Each recording includes the complainant's requested resolution, the date of the complaint, a description of the complaint, the expected date for a response or resolution, and the established priority of the complaint.</p> <p>Documentation and Reporting: Euroka Energy documents and reports on its complaints management process and specific arrangements throughout their lifecycle. Proper documentation facilitates accountability, monitoring, and risk management associated with complaints.</p>
9.4	<p>Demonstrating that any gaps in the skills and/or knowledge of staff have been identified and that appropriate steps have been taken to fill those gaps (for example, through recruitment or training).</p>	<p>Euroka Energy does not currently employ an analyst to perform the analysis and matching of our generation and consumption profiles of our solar farms and commercial customers. We intend to hire a mathematics graduate that has that skill set.</p>

Annexures relevant to compliance capacity:

Annexure ID	Document Name	Relevance to Business Compliance Capacity
C1	Euroka Risk and Compliance Audit SSR Report Sept 2022 Final	Directly assesses the company's risk and compliance status
C2	Compliance Policy	Outlines the company's overall compliance framework
C3	Compliance Reporting Procedure	Describes how compliance reporting is managed
C4	Complaints Policy	Indicates compliance in handling customer complaints
C5	Code of Ethics	Reflects compliance with ethical standards
C6	Audit Policy	Outlines the company's internal audit procedures, a key aspect of compliance
C7	Obligations Register	Lists legal and regulatory obligations, a core aspect of compliance
C8	Risk Management Policy	Describes how risks are identified and managed, essential for compliance
C9	Risk Register_Matrix - Euroka	A tool for assessing and managing risks, indicating compliance capacity
C11	Energy Retail Annexure Third Party Process	May include compliance aspects in dealing with third parties
C12	Third Party Due Diligence Process	Indicates compliance procedures in vetting third parties
C13	Third-Party Compliance Monitoring and Reporting Process	Shows how the company monitors and reports on third-party compliance
C14	Customer Hardship Policy	Reflects compliance with policies for customer hardships
C15	Recruitment and Termination Policy	Indicates compliance in HR processes
C16	Privacy Policy	Demonstrates compliance with privacy laws and regulations
C18	Website Notices	Includes compliance statements for the website, reflecting regulatory compliance
C19	Family Violence Policy NECF	Indicates compliance with specific customer care standards
C20	Better Bills Guidelines Requirements Checklist	Reflects adherence to billing guidelines, a compliance aspect
C21	Risk and Compliance Audit Action Verification Letter Sept 2022	Verifies actions taken in response to a risk and compliance audit

2.5 Risk management strategy (Criterion 9 to 12)

Criterion from Guideline	Required information	Response from Euroka Energy Pty Ltd
Criterion 10	A copy of your risk management strategy covering both operational and financial risks	<p>Please find attached to this application a copy of Euroka Energy Pty Ltd's Risk Management Policy covering both operational and financial risk (Annexures C8 and C9)</p> <p>Our Risk Management Policy, as outlined in document 'C8 Risk Management Policy', includes specific modules that address operational, legal, and compliance risks. We conduct regular risk assessments to identify and mitigate potential risks to our business and our customers, ensuring that we maintain a stable and reliable service.</p>
Criterion 11	Evidence that your risk management and compliance strategies have been subject to an external assurance process (we would expect the external assurance process to be conducted by a suitably qualified and independent entity)	Please find attached to this application a copy of the letter of assurance provided by a suitably qualified and independent entity (Annexures C1 and C21)
Criterion 12	Any additional information which demonstrates your ability to manage risk and operate in accordance with the Retail Law objective, particularly the long-term interests of consumers (for example, copies of any retail contracts that you have developed)	The AER will be provided with a login to a compliance system that will be used in the management of our compliance program.

2.6 Agreements in place with key market players within the relevant jurisdictions (distribution businesses and AEMO) If agreements not finalised provide information as to negotiations (Criterion 13 to 15)

Criterion from Guideline	Required information	Response from Euroka Energy Pty Ltd
Criterion 13	Evidence of any membership, or steps taken to obtain membership, of a recognised energy industry ombudsman scheme in the jurisdiction/s in which you intend to retail energy to small customers	Euroka Energy is not submitting an application to EWON and EWOQ as Euroka Energy will not be supplying residential or small and medium size customers.
Criterion 14	Evidence of any agreements / arrangements in place with key market players within the jurisdictions in which you intend to operate. This includes, but is not limited to, distribution businesses and AEMO. Where agreements / arrangements have not been finalised, you should provide details of any negotiations or steps that have occurred to date and when you expect agreements / arrangements to be completed	Refer Annexure A11 who billing agreement is currently undergoing legal review.
14a	If you intend only to onsell energy you should provide details of the back-up arrangements you have in place in case your business fails	Not applicable.
Criterion 15	Any additional information that will help us assess your	

	organisational and technical capacity	
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3. **Part Three: Required information – financial resources (Criterion 3 to 9)**

The applicant is a start up business. Below we address criterion 3 to 9.

Criterion from Guideline	Required information	Response from Euroka Energy Pty Ltd
Criterion 3	Details and evidence of your current financial position (most recent financial year). For example, interim financial statements (statement of profit or loss, statement of cash flows, statement of financial position), current bank statements	Please find attached documentation confirming Euroka Energy Pty Ltd's current financial position marked Annexures F1 to F31 provided on a commercial in confidence basis. In particular: <ul style="list-style-type: none"> • F12 contains the current bank balance of Euroka Energy Pty Ltd • F13 contains the current bank statement of Dancar • F24 to F31 contains evidence of funds of the key shareholders.
Criterion 4	If you are part of a group of related companies, and/or party to a partnership, joint venture or alliance agreement with another company, and you are given financial support by that entity, you should provide -	Not Applicable
4.1	Details of the ownership structure of the group (including relationships with group entities). If you are not a group but a standalone entity you should also provide details of your ownership structure.	Refer to Annexure B6
4.2	The contractual arrangements (e.g.	Refer to Annexures F10, F11, F14.

	alliance contracts, associate contracts, establishment contracts) that define relationships within the group—including shared resources (such as office space, staff, sales channel, any other resource), guarantees, revenue flows, obligations and/or responsibilities	
4.3	Consolidated audited financial statements for the group	Not Applicable
Criterion 5	A written declaration, within 6 months of the application being accepted by the AER (published), from your Chief Financial Officer, Chief Executive Officer or director/s stating you are a going concern and that the officer is unaware of any factor that would impede your ability to finance your energy retailer activities under the retailer authorisation for the next 12 months. For unincorporated applicants, a written declaration should be provided by the person/s in effective control of the business	Please find attached a declaration answering criterion 5 in Annexure D1.
Criterion 6	A written declaration, from an independent auditor/accountant or your principal financial institution stating that -	Please find attached a written declaration answering criterion 6 in Annexure D2.
6.1	An insolvency official has not been appointed in respect of the business or any	Euroka Energy Pty Ltd confirms that an insolvency official has not been appointed in respect of the business or any property of the business.

	property of the business	
6.2	No application or order has been made, resolution passed or steps taken to pass a resolution for the winding up or dissolution of the business	Euroka Energy Pty Ltd confirms that no application or order has been made, resolution passed or steps taken to pass a resolution for the winding up or dissolution of the business.
6.3	They are unaware of any other factor that would impede your ability to finance your energy retail activities under the authorisation	Euroka Energy Pty Ltd is unaware of any other factor that would impede its ability to finance its energy retail activities under the authorisation.
Criterion 7	Details of any bank guarantees or arrangements or process to access additional capital	Refer to Annexures F10, F11, F14. Evidence of the funds and access to capital of shareholders is outlined further in Annexures F24 to F31
Criterion 8	Forecast revenue and expenses for three to five years or to the point where your business is cash-flow positive, whichever is the latter. This forecast should include profit and loss, cash flow, and balance sheet and be consistent with your business plan and highlight all key assumptions and risks	Please refer to the attached financial forecast provided by our accountants in Annexures F16 to F23.
Criterion 9	Any additional information that will help us assess your financial capacity to operate as an energy retailer (this could include your ownership structure if you are a stand-alone entity).	

4. **Part Four: Required information – suitability (Criterion 1 to 7)**

Euroka Energy Pty Ltd is a fit and proper entity to hold a retail authorisation. Neither itself, its related body corporates, its officers or associates have had any criminal or civil convictions.

Criterion from Guideline	Required information	Response from Euroka Energy Pty Ltd
Criterion 1	For you (the applicant) and your associates, any other business where your officers have held an officer position and any other entity that exerts control over your business activities—details of -	
1.1	any material failure to comply with regulatory requirements, laws or other obligations over the previous 10 years, including infringement notices or other enforcement action (including voluntary administrative undertakings) being taken by a regulatory body.	Please refer to the attached declarations Annexures D1 to D5.
1.2	any previously revoked authorisations, authorities or licences held in any industry and the reason/s for the revocation	As above.
1.3	any failed authorisation, authority or licence applications in any industry and the	As above.

	reason/s the application was unsuccessful	
1.4	any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry	As above.
1.5	any situation/s where you (or an associate) have previously triggered the RoLR provisions of the Retail Law or equivalent state/territory/foreign legislation, or have transferred or surrendered an authorisation or licence in circumstances where if not done, triggering a RoLR event would have been likely	As above.
Criterion 2	Details of any offences or successful prosecutions under any territory, state, Commonwealth or foreign legislation (including, but not limited to, the <i>Australian Securities and Investments Commission Act 2001 (Cth)</i> , <i>Competition and Consumer Act 2010 (Cth)</i> and the <i>Corporations Act 2001 (Cth)</i>) relevant to your capacity as an energy retailer, or	As above.

	written confirmation that no offences have been committed against, or been prosecuted under, any such legislation. This information must be provided for -	
2a	your current director/s (or shadow / de facto director/s), and any other person that exerts control over your business activities	As above.
2b	if your business is unincorporated, the person/s with effective control of the business	As above.
2c	all persons who are responsible for significant operating decisions for your business	As above.
Criterion 3	Upon request, a criminal history check conducted within the past 12 months for persons listed under information requirement 2	The applicant is willing to provide this on request.
Criterion 4	Written declarations from your Chief Financial Officer (or Chief Executive Officer) -	As above.
4.1	that members of your management team have not been disqualified from the management of corporations	As above.
4.2	about the record of bankruptcy of your	As above.

	management team (including in any overseas jurisdiction)	
Criterion 5	Full names and current residential addresses of all your officers	<p>Please find below.</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p>
Criterion 6	Details of policies and procedures addressing the probity and competence of officers and any other key management staff	<p>Please see the following:</p> <ul style="list-style-type: none"> • C5 Code of Ethics • C15 Recruitment and Termination Policy • C2 Compliance Policy
Criterion 7	Any additional information that will assist us in our consideration of the character and past performance of your officers. If there has been a compliance issue, how will this be addressed in your future operations	<p>Euroka Energy will be retailing to large energy consumers and will do so in parallel with the development of a fleet of solar PV farms (see Annexures B1 to B11). Euroka Energy has access to significant financial reserves (see Annexures B1, and F1 to F31) and will take a cautious approach, with a well-developed understanding of the risks within the wholesale market and risk mitigation measures as outlined within Annexures C8 and C9. As the business develops, it will implement its resourcing plan (Annexure B5).</p>

		<p>While not retailing to smaller consumers, as is evidenced in this application, Euroka Energy has documented various policies and procedures to ensure compliance with all provisions including the family violence policy and customer hardship policy (Annexures C19 and C14).</p> <p>Euroka Energy will have the assistance of select third parties who are experienced and qualified. Euroka Energy will oversee those third parties (see Annexures C11 to C13).</p> <p>Euroka Energy is a business that has the financial capacity, the experience, the resources and the processes to run effectively as an authorised electricity retailer in the states identified above.</p>
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LIST OF ANNEXURES INCLUDED WITH THIS APPLICATION

Annexure ID	Document Name	Reason Not to Publish
OPERATIONAL AND TECHNICAL		
A1	Director and CFO, Daniel Huang CV	Contains personal information of a key executive
A1a	Employment Contract_ Danial Huang	Contains sensitive employment contract details
A2	CEO Mark Marjoribanks CV	Contains personal information of the CEO
A3	Employment Contract_Mark Marjoribanks	Contains sensitive employment contract details
A4	COO, Tania Weinert - CV	Contains personal information of the COO
A5	Employment Contract_ Tania Weinert	Contains sensitive employment contract details
A6	John Farmer CV	Contains personal information of an individual
A6a	Employment Contract_ John Farmer	Contains sensitive employment contract details
A7	Euroka Business Organization Chart	PUBLIC

		company structure
A8	BraveT Capability Statement 2021	PUBLIC
A9	Brave Managed Services Agreement v0.1 (draft)	Contains sensitive business terms
A10	Brave RX Billing (C&I) Proposal	Contains proprietary business strategies
A11	Draft YUR 4029 MC_Agreement_Special V3	Contains draft agreement with sensitive details
A12	Euroka IT Letter	Contains internal IT communications which may be sensitive
A13	Endeavour Energy - Retailer Engagement	Contains details of business engagement
A14	Energy Q - Market Participant Registration	Contains details of market participation
A15	Compliance Quarter - Capability Statement	PUBLIC
A16	Compliance Quarter Agreement	Contains business agreement terms
A17	Yurika - Metering Capability Statement	PUBLIC
A18	Kim Essex CV	Contains private and sensitive information.
A19	Melissa Rudinski CV	Contains private and sensitive information.
A20	Company Structure Diagram	PUBLIC
BUSINESS INFORMATION		
B1	Euroka Energy Business Plan	Contains detailed business strategies and plans
B2	DCM Solar Company Extract	PUBLIC
B3	DCM Green Company Extract	PUBLIC
B4	ASIC Company Detail - Euroka Energy Pty Ltd 01.09.22	PUBLIC
B5	Euroka Energy Resourcing Plan 2023	Contains internal planning details
B6	Diagram of company structure/relationships	PUBLIC
B7	Letter to AER Hamilton Knight	Contains private and sensitive information.
B8	ASFCQ4 Letter to AER	Contains private and sensitive information.
B9	RSB Letter to AER	Contains private and sensitive information.
B10	ASFCQ1 Letter to AER	Contains private and sensitive information.
B11	Share Purchase Agreement Birdwood	Contains private and sensitive information.
POLICIES AND PROCEDURES		

C1	Euroka Risk and Compliance Audit SSR Report Sept 2022 Final	Contains sensitive audit and compliance details
C2	Compliance Policy	PUBLIC
C3	Compliance Reporting Procedure	PUBLIC
C4	Complaints Policy	PUBLIC
C5	Code of Ethics	PUBLIC
C6	Audit Policy	Contains internal audit procedures
C7	Obligations Register	Contains detailed legal and regulatory obligations
C8	Risk Management Policy	Contains internal risk management strategies
C9	Risk Register_Matrix - Euroka	Contains detailed risk assessment
C10	Additional Information Request - Market Report Euroka Energy	Contains market analysis information
C11	Energy Retail Annexure Third Party Process	Contains details of third-party processes
C12	Third Party Due Diligence Process	Contains proprietary due diligence processes
C13	Third-Party Compliance Monitoring and Reporting Process	Contains internal compliance monitoring details
C14	Customer Hardship Policy	PUBLIC
C15	Recruitment and Termination Policy	Contains internal HR policies
C16	Privacy Policy	PUBLIC
C17	Rights and Obligations	Contains details of legal rights and obligations
C18	Website Notices	PUBLIC
C19	Family Violence Policy NECF	PUBLIC
C20	Better Bills Guidelines Requirements Checklist	Contains internal compliance checklist
C21	Risk and Compliance Audit Action Verification Letter Sept 2022	PUBLIC
DECLARATIONS		
D1	Declarations DH Criteria 5	PUBLIC
D2	Criteria 6 Declaration	PUBLIC
D3	Declarations Mark CEO Criteria 4	PUBLIC
D4 and D5	Declaration	PUBLIC
FINANCIAL INFORMATION		
F1	Shareholder Loan Agreement - Emily Yan Zheng	Contains terms of a shareholder loan agreement
F2	Accounting Letter - Emily Zheng	Contains sensitive financial information

F3	Shareholder Loan Agreement - John Farmer	Contains terms of a shareholder loan agreement
F4	Accounting Letter John Farmer	Contains sensitive financial information
F5	Shareholder Loan Agreement - Joseph Mancini	Contains terms of a shareholder loan agreement
F6	Accounting Letter - Joseph Mancini	Contains sensitive financial information
F6	Shareholder Loan Agreement - King Leong Wong	Contains terms of a shareholder loan agreement
F7	Accountant Letter - Mr King Wong	Contains sensitive financial information
F8	Shareholder Loan Agreement - Daniel YW Huang	Contains terms of a shareholder loan agreement
F9	Accountant Letter - Mr Danial Huang	Contains sensitive financial information
F10	Euroka Energy Shareholder Agreement	Contains terms of the shareholder agreement
F11	Shareholders Investment Agreement	Contains terms of investment agreement
F12	Euroka Energy Cash at Bank	Contains financial information
F13	Dancar Cash at Bank	Contains financial information
F14	Deed of Guarantee Dancar	Contains terms of a guarantee agreement
F15	Euroka Shareholders Guarantee	Contains terms of a shareholder guarantee
F16	2023 Projected FS - Euroka Energy Pty Ltd	Contains financial projections
F17	2024 Projected FS - Euroka Energy Pty Ltd	Contains financial projections
F18	2025 Projected FS - Euroka Energy Pty Ltd	Contains financial projections
F19	Retailer Cash Flow \$178 Wholesale Price (50% Customer Volume)	Contains financial projections and terms
F20	Retailer Cash Flow \$178 Wholesale Price (200% Customer Volume)	Contains financial projections and terms
F21	Retailer Cash Flow \$253 Wholesale Price (50% Volume Load)	Contains financial projections and terms
F22	Retailer Cash Flow Expected Cash Flow (\$145 Wholesale Price)	Contains financial projections and terms
F23	Retailer Cash Flow \$253 Wholesale Price (200% Volume Load)	Contains financial projections and terms

F24	Evidence of funds - Y Zheng - Statement	Contains sensitive financial information
F25	Evidence of funds - J Farmer - Letter	Contains sensitive financial information
F26	Evidence of funds - J Mancini - Letter	Contains sensitive financial information
F27	Evidence of funds - J Mancini Shares Letter	Contains sensitive financial information
F28	Evidence of funds - J Mancini Share Certificate	Contains sensitive financial information
F29	Evidence of funds - J Mancini Shares Performance Valuation	Contains sensitive financial information
F30	Evidence of funds - K Wong - Statement	Contains sensitive financial information
F32	Evidence of funds - D YW Huang	Contains sensitive financial information

Capability Statement

by Brave Energy Systems

Simplify complex

Leading enterprise solutions for the Australian Energy Sector.

brave
ENERGY SYSTEMS

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11	—•	Bravecloud SaaS
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Company Overview

Established in 2005, Brave Energy Systems develops leading-edge technological systems exclusively designed for the Australian Energy Sector.

Modern software that is built around the local industry itself will give Australian businesses the best opportunity to deal with a complex environment in a simplified way.

We have been solving data and efficiency problems for local energy participants for 15 years. Our depth of industry knowledge coupled with our passion for developing amazing software has led us to create dependable and repeatable solutions for some of the largest energy organizations in Australia.

Our focus is on creating long-term partnerships with market participants, so they can continue to minimize operational costs, improve customer experience and have a greater choice of options to grow their business long after the implementation of our software solutions.

Contact Information

Brave Energy Systems

📍 Level 1, 47 Gilby Road
Mount Waverley VIC 3149

☎ 03 9575 9000

✉ info@braveenergy.com.au

🌐 Braveenergy.com.au

Put an end to data and efficiency problems

Our software is tailored to meet the operational and strategic needs of Australian energy networks, metering service providers and retailers. Ranging from complete suites through to standalone platforms, our software solutions include:

RX Suite for Retailers

Protect your bottom line with Brave RX

Brave RX provides a powerful suite of products that are simple to use. Also, Brave RX is the only Australian energy retail software product that identifies revenue leakages and brings down the cost.

NX Suite for Networks

Discover why you can trust us to get it right.

Brave NX, the only Australian energy software products for distribution and transmission participants that are dedicated to improving automation, business efficiency and the bottom line.

MX Suite for Metering

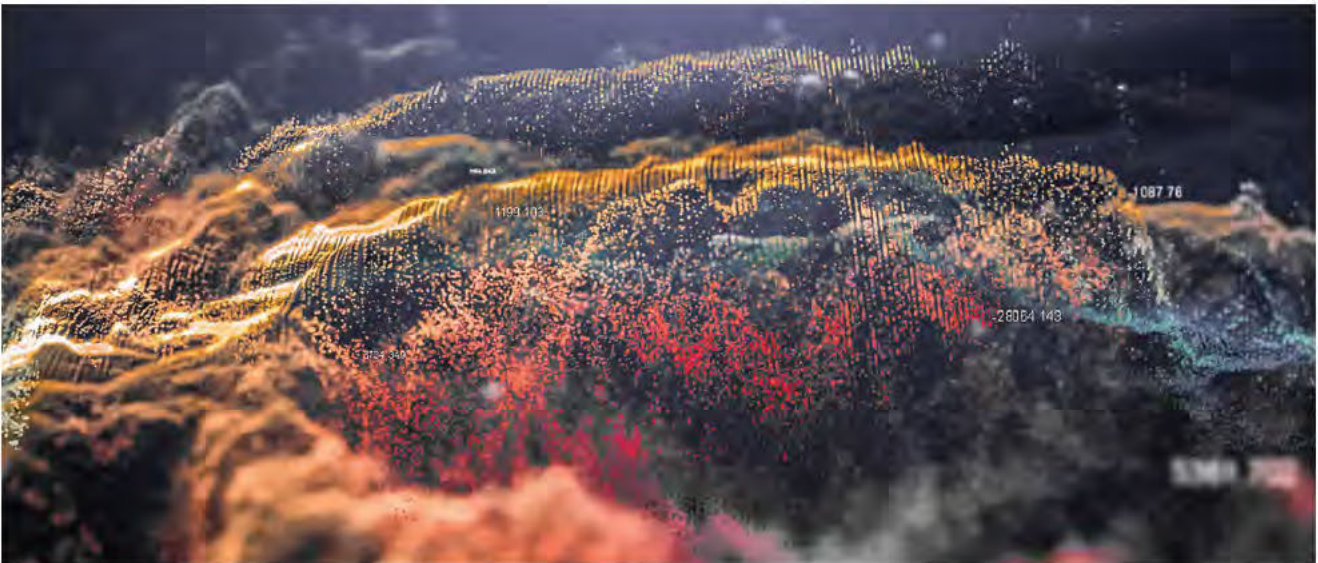
Discover why you can trust us to get it right.

These sophisticated suite of products, together with our excellent service, provides you with all the cover that you need. Protect your bottom line with Brave MX, the only Australian energy metering software product range dedicated to resolving revenue leakage long-term.

The Brave Difference

Brave Energy Systems has a number of areas where we differentiate from our competitors in the Australian energy market.

Architectural philosophy



Our software architecture focuses on separating market specific rules from general functionality such as billing or CRM. Our ultimate architectural goal is to enable best of breed solutions that easily connect to the Australian energy market by providing an open API layer that minimises the need for these systems to fully understand the numerous market and b2b processes. Furthermore, this architecture seeks to minimise the ongoing level of change that these systems need to address as regulations and market rules continue to evolve at an increasing pace.

Traditional approaches attempt to customise these large expensive platforms to handle all aspects of Australian rules. For example, a billing system which wants to record a new customer, not only needs to know who that customer is and on what date they want to win them on, but also the entire life cycle of "how" to win the customer. Implementing the "how" not only costs market participants a significant amount of money, it creates additional ongoing maintenance costs and more than likely moves a customer onto their own specific version, baking in future costs to return to a vendor's current version.

By moving to an architecture that separates market specific implementations from general capability, market participants get the best of both worlds. You can choose best of breed solutions from around the world knowing you will have a small level of customisation to operate it in Australia. In avoiding a large bespoke program of change you will have greater agility and lower costs both initially and ongoing. From a market compliance perspective, market participants know they will have an out of the box solution that will remain compliant regardless of future change and whose cost to maintain is not solely their burden.

The Brave Difference



Exclusively built for the Australian market

We're Australian made and reside right here in Melbourne, Australia. Unlike our global competitors we're content with niche and proudly specialise exclusively in the Australian Energy Market. Our software does not require any adaptation to meet the Australian market regulatory requirements or Australian market participant operational requirements.



Delivering greater efficiencies

Our architecture and workflows are designed to reduce the complexities of the operational requirements nominated by the energy industry governing bodies for the user, whilst creating efficiencies to improve operational speed and cost. Our software is focused on bringing automation into workflows at every opportunity.



Reliable team of Australia energy industry specialists

We deliver amazing outcomes for our customers because we genuinely care about creating the best solution for their business. Our skills revolve around our passion for technology and our intimate and extensive knowledge of the Australian energy market. This joint capability gives a unique advantage in the market.



Accurate data and revenue protection

We never underestimate the underlying importance of accurate data. All elements of the data flowing through our software into other critical operational systems must be accurate - always.

With automated reconciliation workflows running in the background of our software, we eliminate root causes of data errors before they run downstream and impact operations such as billing and invoicing.

About Us



Mission

At Brave, we are dedicated to customer success and offer the most sustainable solution for every business. Our mission is to improve the day-to-day operations and sustainability of Australian market participants.



Vision

In an ever-changing market, our vision is to simplify the complexities of the Australian energy industry. We aim to achieve this by leveraging intelligent, automated, reliable and compliant software.



Values

Our people are our biggest asset and their values run deep through the software our customers have come to rely on. We are dedicated to:

- Uncompromising quality
- Reliable partnerships
- Sustainable solutions
- Supporting each other

A Brave Culture

The Australian energy sector is dynamic and, at times, uncertain. To us, being Brave is about being the one sure thing for our customers.

Today, we are proud to say that our depth of industry knowledge, coupled with our passion for creating amazing software has led us to implement systems for some of the largest energy organisations in Australia.

Our knowledge, skill and experience make us Brave.

We connect with our industry leaders, look up to them and learn from the best. Challenging ourselves to provide the best utility software and celebrating successes together is what we do.



100% Aussie Focused

We're Australian made and our whole team is right here in Melbourne, Australia. Unlike our global competitors we're content with niche and proudly specialise exclusively in the Australian Energy Market.



Reliable Team

Even though we develop software, it's software designed by humans for humans. We deliver amazing outcomes for our customers because we genuinely care about creating unique solutions for their business.



Efficient Solutions

A lot of work goes on behind-the-scenes to develop the right solution for our customers. It starts and ends with quality. Our solutions and products are constantly being upgraded to ensure we are always adding quality and value to the lives of our customers.



Accurate Data

With capabilities that range from business analysts and software developers to project managers and customer support, our local teams are here to make sure our customers have the best outcomes from our software from end-to-end.

Our Software Products

Brave RX

Products included in the Retail suite

RX Gateway

Automate friction points

RX Gateway empowers you to manage complex regulatory requirements and mitigate risks while gaining efficiency and customer satisfaction by automating mandatory and critical market processes.



RX Billing

Increase your billing speed and accuracy

Designed for the unique challenges faced by Australian energy retailers, our powerful billing engine helps you stay flexible in a changing market and supported as your business grows.



RX Meter Data

Have certainty when processing core data

In such a heavily data-driven world, we know that you are reliant on correct data interacting with your system in order to remain compliant and serve your customers.



RX Standing Data

Create data confidence

With complex integrated systems, standing data can easily become out of sync, causing hundreds of hours of rework and putting you at regulatory risk.



RX Protect

Protect your bottom line

Processes that produce energy consumption invoices are complex - often with many interdependencies. It is almost impossible, even in the most mature of businesses, to avoid processing exceptions. RX Protect changes that.



Our Software Products

Brave NX

Products included in the Network suite

NX Gateway

Automate friction points

NX Gateway empowers you to manage complex regulatory requirements and mitigate risks while gaining efficiency and customer satisfaction by automating mandatory and critical market processes.



NX Billing

Increase your billing speed

Improve and automate your number one business process, no matter how complex or dynamic the arrangements may be.



NX Meter Data

Have certainty processing core data

In such a heavily data-driven world, we know that you are reliant on correct data in order to both remain compliant and serve your customers.



NX Standing Data

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With complex integrated systems, standing data can easily become out of sync, causing hundreds of hours of rework and putting you at regulatory risk.



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Our Software Products

Brave MX

Products included in the Metering suite

MX Gateway

Automate friction points

MX Gateway empowers you to manage complex regulatory requirements and mitigate risks while gaining efficiency and customer satisfaction by automating mandatory and critical market processes.



MX Billing

Increase your billing speed and accuracy

Designed for the unique challenges faced by Australian energy metering service providers, our powerful billing engine helps you stay flexible in a changing market and supported as your business grows.



MX Meter Data

Have certainty processing core data

In such a heavily data-driven world, we know that you are reliant on correct data in order to both remain compliant and serve your customers.



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MX Protect

Protect your bottom line

Processes that produce energy consumption invoices are complex - often with many interdependencies. It is almost impossible, even in the most mature of businesses, to avoid processing exceptions. MX Protect changes that.



Brave Managed Services

Brave Managed Services (BMS) provides non-client-facing, back-office support for Australian retailers. Key services provided by the BMS team include:

- ✓ Onboarding and transfers
- ✓ Billing and invoicing
- ✓ Tariff management and payment allocations
- ✓ Retail price, network charge and product management
- ✓ Exception management
- ✓ Account hierarchy management
- ✓ Configuration changes
- ✓ Report builder

One of our core strengths is our ability to manage and monitor our application. We are best placed to undertake this critical function given our deep knowledge and detailed understanding of our solution and how it operates. We have implemented health check controls to ensure the application is operating efficiently and effectively. Remedial activity is undertaken by our dedicated operation team members and the technical support team.

We believe that offering the system as a SaaS solution and providing our back-office services and support enables you to maintain a clear focus on customer service improvements, delivering growth strategies and reducing customer churn.

Our solution provides a flexible and powerful solution to enable your operation in the Australian National Energy Market. Each module can operate independently, integrating with existing software and processes, or be combined with other applications to grow into a fully integrated retail solution. Brave's Retail solution provides the full coverage of a large system with the flexibility of a modular application.

The modular nature of our solution allows it to be easily customized for additional local markets, requiring modifications only to data loading interfaces, leaving the core application functionality unchanged. RX Billing and Brave™ Managed Services are aimed at reducing the level of exceptions that need to be addressed by business users and to provide tracking mechanisms such as task management to manage outstanding tasks. Powerful workflow capabilities enable it to model your existing business processes whilst remaining compliant with energy market rules when interacting with the market.

Bravecloud SaaS

Our products are available as SaaS models across retail, metering, distribution and transmission.

Bravecloud is our unique SaaS platform that is innovative, powerful and enables the Australian market participants to cut down operational costs, comply with the ever-changing regulations and boost profits by simplifying critical and costly data transactions.

The Bravecloud platform delivers proven performance, reliability and availability, secures customer data and complies with the market standards and regulations.

Running exclusively in Azure, the Bravecloud platform has been carefully architected to:

- ✓ Ensure the integrity, privacy and security of our customers' data.
- ✓ Limit all data processing, storage and transmission to Australian regions.
- ✓ Provide fully redundant services, providing high levels of availability, including complete geo-redundancy across Azure's Eastern and South-Eastern region.
- ✓ Ensure continuous data protection through a combination of near real-time geo-replication and geo-redundant backups.
- ✓ Enable limitless, transparent scalability, driven by committed service levels.

Our core Bravecloud architecture comprises the infrastructure that supports our core software and service components. These core components intrinsically support seamless, secure access, scalability and resilience allowing the provision of private tenancies in a cloud environment.

MarketNet Connectivity

Bravecloud provides dedicated connectivity into MarketNet, AEMO's private data network connection, boasting an active/active connectivity configuration into AEMO's Norwest and Brisbane data centres cross-linked into both of Bravecloud's Azure regions.

Dedicated market connectivity ensures our SaaS services provide optimal and robust performance in a self-contained environment.

The Bravecloud platform also provides additional benefits and features, including:

- ✓ Deployment regions and data locality
- ✓ Single tenancy application
- ✓ Scalability



Operating under an ISO 27001 compliant ISMS leveraging ISO27002 and ISO27018 controls, the Bravecloud platform delivers high performing security and reliability.

Bravecloud has been designed exclusively for the purpose of offering our energy solutions to Australian enterprise and small business customers. Striving for both best practice and a cost-efficient deployment model, Bravecloud segregates customers whilst allowing for the sharing of what has traditionally been costly infrastructure and associated management services.

Data Protection

-  **Encryption Principles & Standards**
The Bravecloud architecture employs multiple layers of encryption thereby ensuring data is protected at rest and in transit by at least one layer of encryption whilst at rest and multiple layers of encryption when in transit.

-  **Encryption at Rest**
Every database deployed into Bravecloud is done so under the Azure SQL Database PaaS service. Policy dictates that each database is configured with encryption turned on ensuring all data, logs and backups are encrypted.

-  **Encryption in Transit**
All data flows within Bravecloud take place over encrypted connections and, where travelling over public networks are further encapsulated in secondary tunnels.



Brave Energy Systems

www.braveenergy.com.au



COMPLIANCE QUARTER: PROFILE



WWW.COMPLIANCEQUARTER.COM.AU

WHY

Regulatory compliance services need to evolve at the same pace as the markets they serve. We make this possible.

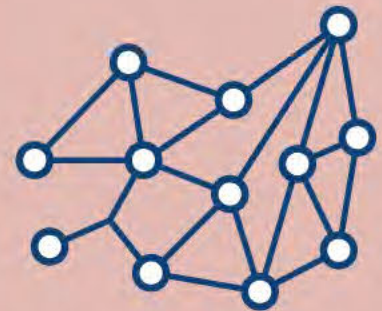
With energy expertise



With regulatory specialists



With ground-breaking systems



We make it easier for businesses under an immense regulatory burden, and we give those with the responsibility for this endless task a sense of ease and control.

The tools that we have developed and employ are explained in this document.

Compliance Quarter works with a large number of energy retailers with a focus on energy compliance. We provide a virtual compliance officer service where we ensure that our clients are aware of regulatory changes and that our clients are implementing a compliance management program.

Our passion is the evolving energy market. The integration of large-scale and embedded generation into the NEM gives rise to interesting regulatory challenges.

We enjoy complexity. We love applying existing regulatory frameworks to new and interesting business models and new services that benefit consumers, the environment, and society.

If you have a challenge for us, we would love to hear from you.

HOW WE WORK

Each engagement is customised to ensure that we meet the needs of our clients.

We review our client's businesses and determine what resources the client needs to ensure compliance.

The resources that we provide our clients with include documents establishing a compliance framework, online and on-demand training, processes, policies and procedures.

We are often engaged to assist our clients in running Compliance Committees where new and existing regulatory obligations are considered and improvements made to our client's compliance programs.

WHO WE WORK WITH

01

Energy regulators including the Australian Energy Regulator (AER) and Essential Services Commission (ESC) - On behalf of our clients.

02

Financial services regulators - On behalf of our clients.

03

External top-tier law firms including on joint projects and on a collaborative basis.

04

Innovative energy businesses. Leading the transition to clean renewable energy.

HOW WE DELIVER

Compliance HUB moves businesses away from static document-based controls to 'self-serve,' responsive and dynamic controls leaving legal and compliance professionals to focus on higher value work.

The Compliance HUB is a centralised SaaS product where obligations are identified and managed.

01

Dynamic risk-based assessment of regulatory obligations.

02

Obligations linked to controls so you can see what needs to change and when.

03

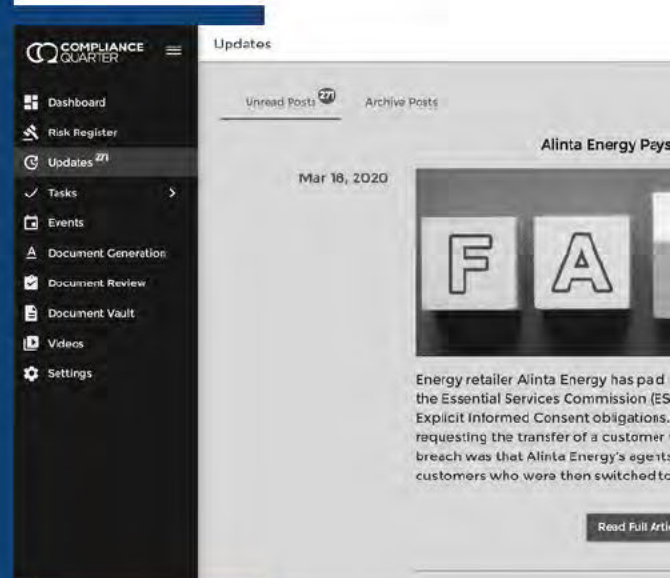
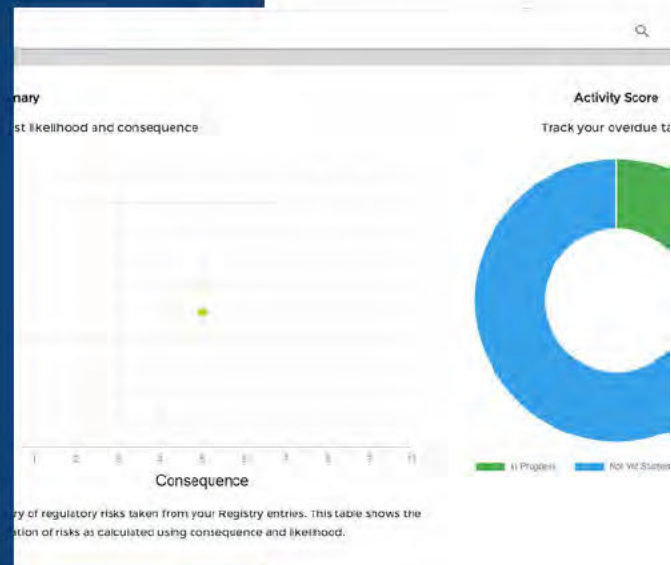
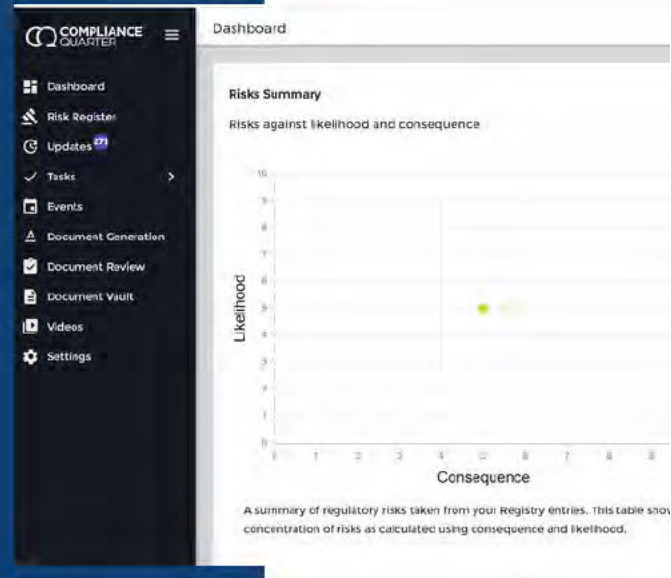
Automated document review using Titan, built in consultation with data scientists from Oxford, UK.

04

A policy and procedure 'Vault' with automatic version control.

05

Scenario based video training for front-line staff including on AFSL compliance, customer hardship, payment difficulties, EIC and more.



CASE STUDIES



Case Study: Operationalising Obligations

We were engaged by a large energy distributor to develop controls for an obligations register drafted by their external legal team. We worked with the client to develop a series of process documents, policies, procedures and guidelines that they then rolled out across the business.

Case Study: Retail Authorisations

We worked with a solar PPA provider looking to expand and offer retail supply within Australia. We successfully obtained electricity authorisations and licences so that the client could retail electricity in all of the Eastern States of Australia.

Case Study: Compliance Manager

We took over the function of Compliance Manager in an established electricity retailer- replacing the existing Compliance Manager who left for other employment. We were able to offer an outsourced solution to the client, providing ongoing support to the business, including via a dedicated Slack channel. We helped the client launch new retail products and further refined its compliance program.

We have provided the Compliance Manager service for several energy businesses operating within Australia.





THE FUTURE OF REGULATORY COMPLIANCE CONSISTS OF ADVANCED SYSTEMS WORKING ALONGSIDE EXPERTS.

We have worked with some of the world's
most innovative energy businesses.

yurika

Part of Energy Queensland

Metering

03598 kWh

Capability
Statement 2022



yurika

Through market-leading metering solutions, our data insights will empower decisions and transform business.

yurika

Part of Energy Queensland

NEM Type 1-4 metering services

Metering Coordinator (MC)

The role of the MC is independent of both the network business and the electricity retailer. As a MC, we are responsible for appointing the MP who installs and maintains the meter and the MDP who will collect the customer energy usage data and provide it to the NEM, electricity retailer and other customer nominated parties.

Metering Provider (MP)

We are an accredited MP which means we can install, commission, gather and verify data remotely from meters within the NEM market. MP services include the provision, installation and maintenance of compliant metering within the NEM Type 1-4 category.

As an MP, we have proudly led the industry in developing innovative load control and solar metering solutions, while also being an early enabler of remote metering capabilities including disconnection and reconnection services.

Metering Data Provider (MDP)

Our range of MDP services includes data warehousing, data validation, data delivery and billing services for metering installations within the NEM for meter types 1-4.

Yurika provides intelligent metering technology, data and insights to market operators, energy retailers, local network service providers, energy brokers and large business customers across Australia.

Leveraging decades of experience, we can help you to make informed decisions about your energy, gas, and water usage to improve your operating efficiency, support achievement of your sustainability goals and connect you to an electric future.

We specialise in the provision of high-quality innovative metering solutions that include:

- National Electricity Market (NEM) Type 1-4 metering for business and residential customers
- Embedded networks
- Multi-utility (water, gas, electricity) sub-metering
- Value-adding data and analytics
- Ancillary metering solutions that include HV testing and design consulting services

NEM Type 1-4 metering services

We are an Australian Energy Market Operator (AEMO) accredited Metering Coordinator (MC), Meter Provider (MP) and Meter Data Provider (MDP) for Type 1-4 metering services for business and residential customers. The NEM covers all Australia except the NT and WA. The NEM is both a wholesale electricity market and the physical power system used to transport power.

Embedded Networks

As an accredited Embedded Network Manager (ENM), we have wide ranging and proven experience in delivering and managing embedded networks for customers across retirement villages, shopping centres, apartment buildings, airports and other developments.

Our services include:

- Metering solutions for new greenfield and existing brownfield sites
- Providing consulting services to ensure compliance with National Electricity Rules (NER) and local jurisdictional rules is met

Yurika provides pattern approved, NEM compliant embedded metering solutions and can also act as the ENM. Our embedded network metering services enable embedded network operators (ENOs) to gain access to electricity consumption data, helping them to understand tenant usage and provide data feeds for accurate billing.

Embedded Network Management services

We can be appointed by an ENO / Exempt Embedded Network Service Provider (EENSP) to provide ENM services by entering into a services agreement. Our ENM services include:

Establishment

- Collection of drawings and documentation relating to the Embedded Network

- Review of electrical layout and connection points
- Embedded network code creation/transfer
- National Metering Identifier (NMI) allocation for child connections
- Standing data collection
- Allocation of distribution loss factors and network charge codes

Ongoing Management

- Ongoing compliance of embedded network
- Creation/abolishment of child NMIs
- Performing the role of LNSP
- Annual AEMO audit
- Notifications to other market participants when required
- Ensuring data retention and security is upheld
- Dispute resolution and complaints handling

Multi-utility sub-metering

Our multi-utility sub-metering solutions gather accurate energy and utility information to assist you in understanding consumption across your site(s). We can install metering at strategic points in your utility/energy supply line to measure electricity, gas and water usage for

specific components, areas, or outcomes, including:

- Main incoming water and gas meters to obtain usage data for the entire site
- Installation of electrical sub meters to measure usage for specific operational components as well as to support monetisation of solar generation, batteries, and electric vehicles
- Tenancy metering
- Solar Generation Sub Metering
- Battery Storage Sub Metering

Efficiency reporting and environmental building ratings (such as NABERS)

- Government reporting for efficiency purposes
- Determining a building rating, such as Australian Government Building Rating
- Statistical analysis to improve plant efficiency opportunities
- Greenhouse gas emissions

Our innovative multi-utility solutions and value-adding information services can also assist customers with environmental requirements such as:

- National Australian Built Environment Rating System (NABERS)
- The National Greenhouse and Energy Reporting Act 2007 (NGER)
- Green star

Bill validation

Data from our multi-utility sub meters can be used to validate utility accounts and ensure correct charging by electricity retailers or water and gas utilities.

Data and analytics solutions

We provide a vast and varied suite of data visualisation, analytics and reporting products that can provide you with rich insights, enabling timely and effective decision-making that can transform your business. We deliver information that is accurate, relevant and consistent using systems that are easy to use, dependable, flexible and secure.

Our data and analytics solutions enable your customers to better manage their utility and energy consumption through a range of cost-effective solutions suitable for various information needs, resources and IT requirements.

InfoDynamics is an intuitive online data management and information reporting tool which enables customers to make informed management decisions regarding electricity, gas and water consumption.

- Graph Now allows users to quickly and easily visualise consumption, generation and demand metering data, comparing up to 12 meters in one graph.
- Ad hoc and scheduled report generation allows users to generate a range of expertly pre-designed reports as a once off or recurring schedule (daily, weekly, monthly, quarterly, yearly).
- We have a range of advanced user options that give users managing larger portfolios of sites or customers the flexibility required to do so efficiently and easily.

ActiveDash is our online platform specifically designed to allow you to view and benchmark your energy and utility consumption. It includes the ability to view interval consumption data across multiple facilities with diverse consumption profiles. ActiveDash is compatible with all metered utilities on site, including water and gas sub-metering and near RealTime (nRT) data (where applicable).

EMP Multi Plus is an integrated software platform specifically designed to monitor and manage energy and utility consumption. This can be achieved across multiple geographically dispersed facilities with diverse consumption profiles.

EMP Multi Plus is a user friendly and flexible platform that enables users to understand and investigate complex Network, Retail and Service tariffs, providing the ability to produce shadow bills or validate electricity accounts. The ability to configure and run complex tariffs against market data allows customers to identify billing issues and calculate cost implications due to process changes.

near RealTime data (nRT) solution provides five-minute interval data is delivered directly from the electricity metering points through a secure communications channel in near real time- typically within 15 seconds after the end of the interval.

Power Quality Reports

- **Adhoc Customer Reports** a power quality report can assist in the identification of power supply issues allowing you to rectify them before extra damage is done. We currently offer a standardised voltage and current report which is compatible with over 90% of our metering fleet (including single and three phase meters). We must be nominated as your MDP to provide Power Quality Reports.
- **Network Data Initiatives** we are currently undertaking several trials with our Network partners to provide better visibility of Network power quality through ongoing voltage monitoring. The provision of ongoing Network data directly from our metering devices in the field enables Networks to gain a better understanding of energy supply and faults, and prioritisation of rectification works.

Data Provision (NEM12)

Large customers or third parties acting on a customer's behalf can request their metering data on an ad hoc or recurring basis (charges may apply). Small (residential) customers should request meter data from their retailer. We will provide interval metering data in a NEM12 format. NEM 12 file is the current AEMO format for interval data and is widely used in the electricity industry.

Ancillary metering solutions

Our ancillary metering solutions relate to hardware services and solutions we can provide or enable in addition to the physical meter.

Output pulsing & SMARTHUB modbus outputs

We can enable your electricity meter to provide output services, such as pulse outputs and MODBUS capability using our exclusive SMARTHUB technology. Pulsing outputs can be sourced directly from the metering infrastructure to provide consumption data directly to Building Management Systems. Meters can also be activated to provide register information in a MODBUS format, suitable for direct connection to Building Management Systems. Output pulsing can also be installed as part of both NEM and Multi-Utility Sub-Metering solutions.

Current Transformer (CT) and Voltage Transformer (VT) Testing Services

Electricity and utility markets are changing – accurate and reliable consumption data is increasingly critical to AEMO. We are available to work with our customers to develop and deploy programs in the following areas:

- NATA High Voltage CT and VT Testing
- Proven capability from 11kV to 132kV
- NATA Traceable Test Reports supplied by accredited staff
- Testing capability to either the AS or IEC Standards
- Mobile Testing Crew

High Voltage Design Review and Compliance

The deregulation of connection services to the Transmission and Distribution Networks was a part of industry reforms in 2017. This ensured that design, compliance and risk aspects of Network connections remained metered in accordance with the National Electricity Rules, Local Jurisdictional Rules and the SAA wiring rules. Any other standards and rules that are applicable are the responsibility and task of the unregulated Metering Coordinators. This cost was previously absorbed into network charges that were regulated by the AER.

We pride ourselves on making things easy for our customers and offer HV connection design consulting review services to help guide our customers through this process. These services include:

- CT & VT accuracy specification
- Design Review
- Pre & Post Commissioning
- NATA VT & CT Test Services (if required)
- Design & supply of pre-wired metering panel/enclosure (if required)
- Compliance sign-off: National Electricity Rules (NER), Local Jurisdictional Rules (LJR), SAA Wiring Rules

yurika

Part of Energy Queensland

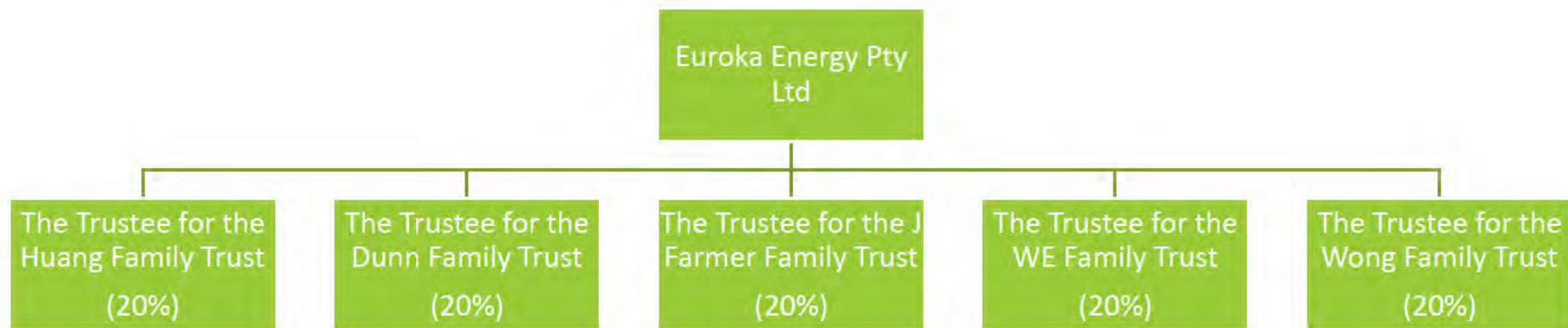
Yurika Pty Ltd

ABN 19 100 214 131

Part of Energy Queensland Pty Ltd

Level 3, 420 Flinders Street, Townsville QLD 4810

PO Box 1090, Townsville QLD 4810





ASIC

Australian Securities & Investments Commission

Current & Historical Company Extract

Name: DCM SOLAR PTY LTD

ACN: 137 772 813

Date/Time: 10 October 2022 AEST 09:15:49 AM

This extract contains information derived from the Australian Securities and Investments Commission's (ASIC) database under section 1274A of the Corporations Act 2001.

Please advise ASIC of any error or omission which you may identify.

EXTRACT

Organisation Details	Document Number
Current Organisation Details	
Name: DCM SOLAR PTY LTD ACN: 137 772 813 Registered in: New South Wales Registration date: 19/06/2009 Next review date: 19/06/2023 Name start date: 14/10/2009 Status: Externally Administered Note: For information about this status refer to the documents listed under the heading 'External Administration and/or appointment of Controller', below. Company type: Australian Proprietary Company Class: Limited By Shares Subclass: Proprietary Company	7E3530510
Previous Organisation Details from 14/10/2009 to 09/03/2011	
Name: DCM SOLAR PTY LTD Name start: 14/10/2009 Status: Registered Company type: Australian Proprietary Company Class: Limited By Shares Subclass: Proprietary Company	024982712
Previous Organisation Details from 19/06/2009 to 13/10/2009	
Name: DCM SANCTUARY PTY LTD Name start: 19/06/2009 Status: Registered Company type: Australian Proprietary Company Class: Limited By Shares Subclass: Proprietary Company	1E5535408

Address Details	Document Number
Current	
Registered address: Unit 8, 37 Nicholson Street, BALMAIN NSW 2041 Start date: 28/09/2010	7E3185578
Principal Place Of Business address: Unit 8, 37 Nicholson Street, BALMAIN NSW 2041 Start date: 01/09/2010	7E3185578
Historical	
Registered address: C/- HERBERT PARTNERS, Unit A, 2 Reliance Drive, TUGGERAH NSW 2259 Start date: 19/06/2009 Cease date: 27/09/2010	1E5535408
Principal Place Of Business address: Unit A, 2 Reliance Drive, TUGGERAH NSW 2259	1E5535408

Start date: 19/06/2009
Cease date: 31/08/2010

Contact Address

Section 146A of the Corporations Act 2001 states 'A contact address is the address to which communications and notices are sent from ASIC to the company'.

Historical

Address: PO BOX 3250, TUGGERAH NSW 2259
Start date: 25/06/2009
Cease date: 21/09/2010

Officeholders and Other Roles**Document Number****Director**

Name: CHRISTOPHER LANCE BAYNES 1E5535408
Address: [REDACTED]
Born: [REDACTED]
Appointment date: 19/06/2009

Previous Director

Name: MARK RAYMOND MARJORIBANKS 027222002
Address: [REDACTED]
Born: [REDACTED]
Appointment date: 24/10/2010
Cease date: 04/03/2014

Name: ATHANASIOS GEORGE KOUMOUKELIS 1E5535408
Address: [REDACTED]
Born: [REDACTED]
Appointment date: 19/06/2009
Cease date: 14/12/2012

Name: MARK RAYMOND MARJORIBANKS 1E5535408
Address: [REDACTED]
Born: [REDACTED]
Appointment date: 19/06/2009
Cease date: 12/10/2009

Previous Secretary

Name: ATHANASIOS GEORGE KOUMOUKELIS 1E5535408
Address: [REDACTED]
Born: [REDACTED]
Appointment date: 19/06/2009
Cease date: 14/12/2012

External Administrator

Role: Appointed Liquidator(CVWU) 7EBR91054
Type: VQ
Name: GEOFFREY TRENT HANCOCK
Address: HM ADVISORY PTY LTD, Level 12, 503-505 Kent Street, SYDNEY NSW 2000
Appointment date: 14/04/2011

Previous External Administrator

Role: Administrator (CUA) 7E4441193

Type: AC Name: MICHAEL CHARLES HIRD Address: MOORE STEPHENS SYDNEY PTY LTD MOORE STEPHENS SYDNE, Level 7, 20 Hunter Street, SYDNEY NSW 2000 Appointment date: 10/03/2011 Cease date: 12/12/2012	
Role: Administrator (CUA) Type: AC Name: GEOFFREY TRENT HANCOCK Address: PITCHER PARTNERS NSW, 'Pitcher Partners Nsw' Level 22, 19-29 Martin Place, SYDNEY NSW 2000 Appointment date: 10/03/2011 Cease date: 14/04/2011	7E7563174
Role: Appointed Liquidator(CVWU) Type: VQ Name: MICHAEL CHARLES HIRD Address: MOORE STEPHENS SYDNEY PTY LTD MOORE STEPHENS SYDNE, Level 7, 20 Hunter Street, SYDNEY NSW 2000 Appointment date: 14/04/2011 Cease date: 12/12/2012	7E4441193

Share Information

Share Structure

Class	Description	Number issued	Total amount paid	Total amount unpaid	Document number
ORD	ORD SHARE	100	100.00	0.00	1E5535408

Members

Note: For each class of shares issued by a proprietary company, ASIC records the details of the top twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the top twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

Name: CHRISTOPHER LANCE BAYNES
Address: [REDACTED]

Class	Number held	Beneficially held	Paid	Document number
ORD	50	yes	FULLY	1E5535408

Name: ATHANASIOS GEORGE KOUMOUKELIS
Address: [REDACTED]

Class	Number held	Beneficially held	Paid	Document number
ORD	10	yes	FULLY	1E5535408

Name: MARK RAYMOND MARJORIBANKS

Address: [REDACTED]

Class	Number held	Beneficially held	Paid	Document number
ORD	40	yes	FULLY	1E5535408

Documents Relating to External Administration and/or Appointment of Controller

This extract may not list all documents relating to this status. State and Territory records should be searched.

Date received	Form type	Date processed	Number of pages	Effective date	Document number
10/03/2011	505U Notification Of Appt Of Administrator Under S.436a, 436b, 436c, 436e(4), 449b, 449c(1), 449c(4) Or 449(6)	10/03/2011	2	10/03/2011	7E3530510
14/03/2011	5011B Copy Of Minutes Of Meeting Of Members, Creditors, Contributories Or Committee Of Inspection Under S.436e Or S.439a	14/03/2011	3	10/03/2011	7E3535687
23/03/2011	5011B Copy Of Minutes Of Meeting Of Members, Creditors, Contributories Or Committee Of Inspection Under S.436e Or S.439a	23/03/2011	8	22/03/2011	7E3558232
14/04/2011	509DA Notice Under S.446a Of Special Resolution To Wind Up Company Resolved That Company Be Wound Up Under 439c(C)	14/04/2011	2	14/03/2011	7E3609352
14/04/2011	509DA Notice Under S.446a Of Special Resolution To Wind Up Company Resolved That Company Be Wound Up Under 439c(C)	14/04/2011	2	14/04/2011	7E3609384
20/04/2011	5011B Copy Of Minutes Of Meeting Of Members, Creditors, Contributories Or Committee Of	20/04/2011	9	14/04/2011	7E3622729

	Inspection Under S.436e Or S.439a				
28/04/2011	524Z Presentation Of Accounts & Statement Presentation Of Final Accounts Of Administrator	28/04/2011	10	14/04/2011	7E3632934
25/10/2011	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	25/10/2011	11	13/10/2011	7E4041119
08/05/2012	506L Notification Of Change Of Address Of Notice Of Change Of Address Of External Administrator(Elec)	08/05/2012	3	08/05/2012	7E4441193
08/05/2012	506L Notification Of Change Of Address Of Notice Of Change Of Address Of External Administrator(Elec)	08/05/2012	3	08/05/2012	7E4441193
08/05/2012	506L Notification Of Change Of Address Of Notice Of Change Of Address Of External Administrator(Elec)	08/05/2012	3	08/05/2012	7E4441232
08/05/2012	506L Notification Of Change Of Address Of Notice Of Change Of Address Of External Administrator(Elec)	08/05/2012	2	08/05/2012	7E4441240
14/06/2012	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	14/06/2012	11	13/04/2012	7E4515850
09/07/2012	1500 Annual Report To Creditors	09/07/2012	10	09/07/2012	7E4577851
13/11/2012	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	13/11/2012	11	13/10/2012	7E4844939
12/12/2012	505 Notification Of 505Y Resignation Or Removal Of Administrator Of Company Under Administration Under S.436e(4), 449b Or 449c 505R Resignation Or Removal Of Liquidator/provisio nal Liquidator	12/12/2012	2	12/12/2012	7E4906476
08/05/2013	506L Notification Of Change Of Address Of	08/05/2013	4	08/05/2013	7E5203709

	Notice Of Change Of Address Of External Administrator(Elec)				
08/05/2013	506L Notification Of Change Of Address Of Notice Of Change Of Address Of External Administrator(Elec)	08/05/2013	4	08/05/2013	7E5203709
10/05/2013	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	10/05/2013	11	13/04/2013	7E5209325
09/07/2013	1500 Annual Report To Creditors	09/07/2013	10	09/07/2013	7E5355044
31/10/2013	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	31/10/2013	11	13/10/2013	7E5617145
13/05/2014	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	13/05/2014	11	13/04/2014	7E6043679
21/08/2014	5011A Copy Of Minutes Of Meeting Of Members, Creditors, Contributories Or Committee Of Inspection Other Than Under S.436e Or S.439a	21/08/2014	4	22/07/2014	7E6305842
29/10/2014	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	29/10/2014	11	13/10/2014	7E6480828
13/05/2015	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	13/05/2015	11	13/04/2015	7E6950347
09/07/2015	1500 Annual Report To Creditors	09/07/2015	7	08/07/2015	7E7114598
30/07/2015	505J Notification Of Appointment Of Liquidator (Creditors' Voluntary Winding Up)	30/07/2015	2	30/07/2015	7E7176886
10/11/2015	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	10/11/2015	11	13/10/2015	7E7458131
16/12/2015	506L Notification Of Change Of Address Of Notice Of Change Of Address Of External Administrator(Elec)	16/12/2015	3	16/12/2015	7E7563174
16/12/2015	506L Notification Of Change Of Address Of	16/12/2015	3	16/12/2015	7E7563174

	Notice Of Change Of Address Of External Administrator(Elec)				
02/05/2016	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	02/05/2016	11	13/04/2016	7E7921630
14/07/2016	1500 Annual Report To Creditors	14/07/2016	8	13/07/2016	7E8156214
10/11/2016	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	10/11/2016	4	13/10/2016	7E8514410
16/12/2016	505Y Notification Of Resignation Or Removal Of Administrator Of Company Under Administration Under S.436e(4), 449b Or 449c	16/12/2016	2	14/04/2011	7E8627216
20/12/2016	506L Notification Of Change Of Address Of Notice Of Change Of Address Of External Administrator(Elec)	20/12/2016	3	20/12/2016	7E8636821
24/04/2017	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	24/04/2017	10	13/04/2017	7E8991084
21/06/2017	1500 Annual Report To Creditors	21/06/2017	5	14/04/2017	7E9171374
31/10/2017	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	31/10/2017	4	13/10/2017	7E9596561
24/04/2018	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	24/04/2018	4	13/04/2018	8E0117759
30/05/2018	1500 Annual Report To Creditors	30/05/2018	6	14/04/2018	7EAA54123
09/05/2019	5602D Annual Administration Return Return Of Creditors' Voluntary Winding Up	09/05/2019	4	13/04/2019	7EAL11869
26/04/2020	5602D Annual Administration Return Return Of Creditors' Voluntary Winding Up	26/04/2020	4	13/04/2020	7EAV92882
24/05/2021	5602D Annual Administration Return Return Of Creditors' Voluntary Winding Up	24/05/2021	5	13/04/2021	7EBH66667

14/07/2021	506L Notification Of Change Of Address Of Notification Of Change Of Address Of An External Administrator Or Controller Or Scheme Administrator	14/07/2021	2	14/07/2021	7EBJ46136
13/12/2021	506L Notification Of Change Of Address Of Notification Of Change Of Address Of An External Administrator Or Controller Or Scheme Administrator	13/12/2021	2	13/12/2021	7EBO17230
28/04/2022	506L Notification Of Change Of Address Of Notification Of Change Of Address Of An External Administrator Or Controller Or Scheme Administrator	28/04/2022	2	28/04/2022	7EBR91054
31/05/2022	5602D Annual Administration Return Return Of Creditors' Voluntary Winding Up	31/05/2022	5	13/04/2022	7EBS84903

Charges Summary

Note : A charge is some form of security given over the property/assets of the company. In order to obtain details of the 'amount secured by a charge', 'the property charged', the property released from a charge or the documents relating to a satisfaction, assignment or change in details, it is necessary to obtain a 'CHARGES EXTRACT'.

This extract may not contain all charges for corporations registered prior to 1991 and it may be advisable to also search the State or Territory records held by ASIC.

ASIC Charge 1860206

Status: SATISFIED

Date and time registered: 30/09/2009 10:40

Fixed/floating: BOTH

Date created: 20/08/2009

Chargee/trustee: SKIPTAN PTY LTD

Form type	Description	Date lodged	Processed	Number of pages	Document number
312	Notification Of Discharge	23/08/2010	yes	2	027111145

Documents

Note: Where no Date Processed is shown, the document in question has not been processed. In these instances care should be taken in using information that may be updated by the document when it is processed. Where the Date Processed is shown but there is a zero under No Pages, the document has been processed but a copy is not yet available.

Date received	Form type	Date processed	Number of pages	Effective date	Document number
19/06/2009	201C Application For Registration As A Proprietary	19/06/2009	3	19/06/2009	1E5535408

	Company				
30/09/2009	309A Notification Of Details Of A Charge	02/10/2009	41	20/08/2009	024068597
14/10/2009	205A Notification Of Resolution Changing Company Name	14/10/2009	2	10/10/2009	024982712
14/10/2009	484E Change To Company Details Appointment Or Cessation Of A Company Officeholder	15/10/2009	2	15/10/2009	026061614
23/08/2010	312A Notification Of Discharge	24/09/2010	2	23/08/2010	027111145
21/09/2010	484 Change To Company Details 484B Change Of Registered Address 484C Change Of Principal Place Of Business (Address)	21/09/2010	2	21/09/2010	7E3185578
25/10/2010	484E Change To Company Details Appointment Or Cessation Of A Company Officeholder	26/10/2010	4	26/10/2010	027222002
14/04/2011	106 Notice Of Cancellation Or Revocation Of A Lodged Document	14/04/2011	2	14/04/2011	7E3609375
24/09/2013	370 Notification By Officeholder Of Resignation Or Retirement	24/09/2013	2	24/09/2013	028682584

End of Extract of 9 Pages



ASIC

Australian Securities & Investments Commission

Current & Historical Company Extract

Name: DCM GREEN PTY LTD

ACN: 141 947 202

Date/Time: 10 October 2022 AEST 09:15:50 AM

This extract contains information derived from the Australian Securities and Investments Commission's (ASIC) database under section 1274A of the Corporations Act 2001.

Please advise ASIC of any error or omission which you may identify.

EXTRACT

Organisation Details	Document Number
Current Organisation Details	
Name: DCM GREEN PTY LTD ACN: 141 947 202 ABN: 52141947202 Registered in: Victoria Registration date: 09/02/2010 Next review date: 09/02/2023 Name start date: 02/06/2010 Status: Deregistered Date deregistered: 06/06/2022 Deregistration reason: SECTION 509 Deregistration code: S509 Company type: Australian Proprietary Company Class: Limited By Shares Subclass: Proprietary Company	CR1046N1
Previous Organisation Details from 10/03/2011 to 05/06/2022	
Name: DCM GREEN PTY LTD Name start: 02/06/2010 Status: Externally Administered Company type: Australian Proprietary Company Class: Limited By Shares Subclass: Proprietary Company	7E3530261
Previous Organisation Details from 02/06/2010 to 09/03/2011	
Name: DCM GREEN PTY LTD Name start: 02/06/2010 Status: Registered Company type: Australian Proprietary Company Class: Limited By Shares Subclass: Proprietary Company	026014151
Previous Organisation Details from 09/02/2010 to 01/06/2010	
Name: DCM ENERGY PTY LIMITED Name start: 09/02/2010 Status: Registered Company type: Australian Proprietary Company Class: Limited By Shares Subclass: Proprietary Company	1E6220500

Address Details	Document Number
Historical	
Registered address: UNIT 8, 'Asic Mail Returned 01/03/2019', 37 **nicholson Street, BALMAIN NSW 2041 Start date: UNKNOWN Cease date: 06/06/2022	031041059

Registered address:	Unit 8, 37 Nicholson Street, BALMAIN NSW 2041	1E6220500
Start date:	09/02/2010	
Cease date:	UNKNOWN	
Principal Place Of Business address:	UNIT 8, 'Asic Mail Returned 01/03/2019', 37 **nicholson Street, BALMAIN NSW 2041	031041059
Start date:	UNKNOWN	
Cease date:	06/06/2022	
Principal Place Of Business address:	Unit 8, 37 Nicholson Street, BALMAIN NSW 2041	1E6220500
Start date:	09/02/2010	
Cease date:	UNKNOWN	

Contact Address

Section 146A of the Corporations Act 2001 states 'A contact address is the address to which communications and notices are sent from ASIC to the company'.

Historical

Address:	PO BOX 6443, HALIFAX STREET SA 5000
Start date:	26/10/2015
Cease date:	22/03/2017
Address:	PO BOX 1220, UNLEY BC SA 5061
Start date:	14/12/2010
Cease date:	26/10/2015

Officeholders and Other Roles**Document Number****Previous Director**

Name:	CHRISTOPHER LANCE BAYNES	1E6220500
Address:	[REDACTED]	
Born:	[REDACTED]	
Appointment date:	09/02/2010	
Cease date:	15/03/2011	
Name:	ATHANASIOS GEORGE KOUMOUKELIS	1E6220500
Address:	[REDACTED]	
Born:	[REDACTED]	
Appointment date:	09/02/2010	
Cease date:	07/10/2010	

Previous Secretary

Name:	ATHANASIOS GEORGE KOUMOUKELIS	1E6220500
Address:	[REDACTED]	
Born:	[REDACTED]	
Appointment date:	09/02/2010	
Cease date:	07/10/2010	

Previous External Administrator

Role:	Administrator (CUA)	7E3530261
Type:	AC	
Name:	ALAN JOHN HAYES	
Address:	PPB PTY LTD PPB PTY LTD MLC, Level 46, 19-29 Martin Place, SYDNEY NSW 2000	
Appointment date:	10/03/2011	

Cease date:	14/04/2011	
Role:	Administrator (CUA)	7E3530261
Type:	AC	
Name:	BRETT STEPHEN LORD	
Address:	PPB, Level 46, 19-29 Martin Place, SYDNEY NSW 2000	
Appointment date:	10/03/2011	
Cease date:	14/04/2011	
Role:	Appointed Liquidator(CTWU)	7EAD08868
Type:	CQ	
Name:	ANDREW JOHN SCOTT	
Address:	PRICEWATERHOUSECOOPERS, 'Tower One International Towers Sydney', Level 17, 100 Barangaroo Avenue, BARANGAROO NSW 2000	
Appointment date:	17/07/2017	
Court no:	Supreme NSW 205721 of 2017	
Cease date:	23/02/2022	
Role:	Appointed Liquidator(CTWU)	7E9268225
Type:	CQ	
Name:	GLENN IAN LIVINGSTONE	
Address:	PPB ADVISORY, '8 Chifley' Level 7, 8-12 Chifley Square, SYDNEY NSW 2000	
Appointment date:	17/07/2017	
Court no:	Supreme NSW 205721 of 2017	
Cease date:	16/07/2018	
Role:	Receiver	7E5962598
Type:	RC	
Name:	DAVID SOLOMONS	
Address:	DE VRIES TAYEH, Level 3, 95 Macquarie Street, PARRAMATTA NSW 2150	
Appointment date:	03/04/2014	
Cease date:	13/08/2019	
Role:	Receiver	7E5962598
Type:	RC	
Name:	RIAD TAYEH	
Address:	DE VRIES TAYEH, Level 3, 95 Macquarie Street, PARRAMATTA NSW 2150	
Appointment date:	03/04/2014	
Cease date:	13/08/2019	
Role:	Appointed Liquidator(CVWU)	7E6346437
Type:	VQ	
Name:	BRETT STEPHEN LORD	
Address:	PPB, '8 Chifley' Level 7, 8-12 Chifley Square, SYDNEY NSW 2000	
Appointment date:	14/04/2011	
Cease date:	17/07/2017	
Role:	Appointed Liquidator(CVWU)	7E6346437
Type:	VQ	
Name:	BRETT STEPHEN LORD	
Address:	PPB, '8 Chifley' Level 7, 8-12 Chifley Square,	

SYDNEY NSW 2000
Appointment date: 14/04/2011
Cease date: 17/07/2017
Role: Appointed Liquidator(CVVU) 7E3610859
Type: VQ
Name: ALAN JOHN HAYES
Address: PPB PTY LTD PPB PTY LTD MLC, Level 46, 19-29 Martin Place, SYDNEY NSW 2000
Appointment date: 14/04/2011
Cease date: 29/06/2012
Role: Appointed Liquidator(CVVU) 7E3610874
Type: VQ
Name: ALAN JOHN HAYES
Address: PPB PTY LTD PPB PTY LTD MLC, Level 46, 19-29 Martin Place, SYDNEY NSW 2000
Appointment date: 14/04/2011
Cease date: 29/06/2012

Share Information**Previous Share Structure**

Class	Description	Number issued	Total amount paid	Total amount unpaid	Document number
ORD	ORDINARY SHARES	10	10.00	0.00	1E7068890

Previous Members

Name: DCM GREEN HOLDINGS PTY LTD
ACN: 147 841 003
Address: Ground Floor, 121 Greenhill Road, UNLEY SA 5061

Class	Number held	Beneficially held	Paid	Document number
ORD	10	yes	FULLY	1E7068890

Name: LEADERS IN REAL ESTATE PTY LIMITED
ACN: 055 959 370
Address: Unit 106, 23 Colgate Avenue, BALMAIN NSW 2041

Class	Number held	Beneficially held	Paid	Document number
ORD	8	yes	FULLY	1E6220500

Name: AGEDCARE101 PTY LTD
ACN: 147 838 588
Address: Ground Floor, 121 Greenhill Road, UNLEY SA 5061

Class	Number held	Beneficially held	Paid	Document number
ORD	2	no	FULLY	1E7068872

Name: ILIAD ENTERPRISES PTY LIMITED
ACN: 078 708 139
Address: GADENS LAWYERS, Level 12, 77 Castlereagh Street, SYDNEY NSW 2000

Class	Number held	Beneficially held	Paid	Document number
ORD	2	yes	FULLY	1E6220500

Documents

Note: Where no Date Processed is shown, the document in question has not been processed. In these instances care should be taken in using information that may be updated by the document when it is processed. Where the Date Processed is shown but there is a zero under No Pages, the document has been processed but a copy is not yet available.

Date received	Form type	Date processed	Number of pages	Effective date	Document number
09/02/2010	201C Application For Registration As A Proprietary Company	09/02/2010	3	09/02/2010	1E6220500
02/06/2010	205A Notification Of Resolution Changing Company Name	02/06/2010	2	31/05/2010	026014151
23/08/2010	309A Notification Of Details Of A Charge	23/08/2010	40	20/08/2010	7E3124051
25/10/2010	484E Change To Company Details Appointment Or Cessation Of A Company Officeholder	REQUISITION	0	25/10/2010	027222001
29/10/2010	484E Change To Company Details Appointment Or Cessation Of A Company Officeholder	01/11/2010	4	01/11/2010	027306185
22/12/2010	484 Change To Company Details 484O Changes To Share Structure 484N Changes To (Members) Share Holdings	22/12/2010	3	14/12/2010	1E7068872
22/12/2010	484 Change To Company Details 484O Changes To Share Structure 484N Changes To (Members) Share Holdings	22/12/2010	3	15/12/2010	1E7068890

07/03/2011	309A Notification Of Details Of A Charge	08/03/2011	31	28/02/2011	027233581
10/03/2011	505U Notification Of Appt Of Administrator Under S.436a, 436b, 436c, 436e(4), 449b, 449c(1), 449c(4) Or 449(6)	10/03/2011	2	10/03/2011	7E3530261
31/03/2011	350 Certification Of Compliance With Stamp Duties Law By Provisional Charge	01/04/2011	3	31/03/2011	027196403
04/04/2011	5011B Copy Of Minutes Of Meeting Of Members, Creditors, Contributories Or Committee Of Inspection Under S.436e Or S.439a	04/04/2011	20	22/03/2011	7E3585146
15/04/2011	509DA Notice Under S.446a Of Special Resolution To Wind Up Company Resolved That Company Be Wound Up Under 439c(C)	15/04/2011	2	14/04/2011	7E3610859
15/04/2011	505Y Notification Of Resignation Or Removal Of Administrator Of Company Under Administration Under S.436e(4), 449b Or 449c	15/04/2011	2	14/04/2011	7E3610866
15/04/2011	505J Notification Of Appointment Of Liquidator (Creditors' Voluntary Winding Up)	15/04/2011	2	14/04/2011	7E3610874
28/04/2011	5011B Copy Of Minutes Of Meeting Of Members, Creditors, Contributories Or Committee Of Inspection Under S.436e Or S.439a	28/04/2011	23	14/04/2011	7E3632920
06/05/2011	5011A Copy Of Minutes Of Meeting Of Members, Creditors, Contributories Or Committee Of Inspection Other Than Under S.436e Or S.439a	06/05/2011	6	06/04/2011	7E3650874
13/05/2011	524Z Presentation Of Accounts & Statement Presentation Of Final Accounts Of Administrator	13/05/2011	11	14/04/2011	7E3665682
21/06/2011	525 Notice Of Disclaimer Of Onerous Property	21/06/2011	2	21/06/2011	7E3748648
08/11/2011	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	08/11/2011	14	13/10/2011	7E4074137
20/12/2011	312C Notification Of Release Of Property	21/12/2011	3	20/12/2011	027932529
11/05/2012	524J Presentation Of	11/05/2012	11	13/04/2012	7E4447111

	Accounts & Statement Accounts Of Creditors' Voluntary Winding Up				
04/06/2012	5011A Copy Of Minutes Of Meeting Of Members, Creditors, Contributories Or Committee Of Inspection Other Than Under S.436e Or S.439a	04/06/2012	18	28/05/2012	7E4494024
29/06/2012	505R Notification Of Resignation Or Removal Of Liquidator/provisional Liquidator	29/06/2012	2	29/06/2012	7E4555013
13/11/2012	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	13/11/2012	11	13/10/2012	7E4845876
30/04/2013	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	30/04/2013	11	13/04/2013	7E5182815
12/07/2013	1500 Annual Report To Creditors	12/07/2013	14	12/07/2013	7E5366736
08/11/2013	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	08/11/2013	12	13/10/2013	7E5634170
04/04/2014	505A Notification Of Appointment Of Receiver	04/04/2014	2	03/04/2014	7E5962598
07/04/2014	504A Notification Of Appointment Of A Receiver	10/04/2014	6	03/04/2014	028869852
13/05/2014	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	13/05/2014	12	13/04/2014	7E6042654
11/07/2014	1500 Annual Report To Creditors	11/07/2014	14	11/07/2014	7E6205740
05/09/2014	506L Notification Of Change Of Address Of Notice Of Change Of Address Of External Administrator(Elec)	05/09/2014	3	05/09/2014	7E6346437
05/09/2014	506L Notification Of Change Of Address Of Notice Of Change Of Address Of External Administrator(Elec)	05/09/2014	3	05/09/2014	7E6346437
28/10/2014	524L Presentation Of Accounts & Statement Accounts Of Receiver	28/10/2014	8	02/10/2014	7E6475530
10/11/2014	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	10/11/2014	12	13/10/2014	7E6509617

30/04/2015	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	30/04/2015	11	13/04/2015	7E6917978
30/04/2015	524L Presentation Of Accounts & Statement Accounts Of Receiver	30/04/2015	8	02/04/2015	7E6918269
13/07/2015	1500 Annual Report To Creditors	13/07/2015	27	30/06/2015	7E7125911
04/11/2015	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	04/11/2015	5	13/10/2015	7E7440765
05/04/2016	524L Presentation Of Accounts & Statement Accounts Of Receiver	05/04/2016	8	02/10/2015	7E7846908
05/04/2016	524L Presentation Of Accounts & Statement Accounts Of Receiver	05/04/2016	8	02/04/2016	7E7847036
11/05/2016	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	11/05/2016	5	13/04/2016	7E7951227
13/07/2016	1500 Annual Report To Creditors	13/07/2016	14	30/06/2016	7E8152813
19/08/2016	507G Report As To Affairs From Managing Controller Who Is Also A Receiver/manager	19/08/2016	11	03/04/2014	7E8268466
27/10/2016	524L Presentation Of Accounts & Statement Accounts Of Receiver	27/10/2016	8	02/10/2016	7E8469481
11/11/2016	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	11/11/2016	5	13/10/2016	7E8516114
24/11/2016	370 Notification By Officeholder Of Resignation Or Retirement	25/11/2016	2	24/11/2016	029805319
20/04/2017	524L Presentation Of Accounts & Statement Accounts Of Receiver	20/04/2017	8	02/04/2017	7E8983090
11/05/2017	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	11/05/2017	11	13/04/2017	7E9042812
13/07/2017	1500 Annual Report To Creditors	13/07/2017	14	14/04/2017	7E9254963
18/07/2017	519D Notification Of Making Of Winding Up Order	19/07/2017	3	17/07/2017	030078012

18/07/2017	505R Notification Of Resignation Or Removal Of Liquidator/provisional Liquidator	18/07/2017	2	17/07/2017	7E9268185
18/07/2017	505G Notification Of Appointment Of Liquidator By The Court	18/07/2017	2	17/07/2017	7E9268225
26/10/2017	524L Presentation Of Accounts & Statement Accounts Of Receiver	26/10/2017	8	02/10/2017	7E9580654
13/11/2017	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	13/11/2017	11	13/10/2017	7E9640744
13/04/2018	524N Presentation Of Accounts & Statement Accounts Of Receiver & Manager	13/04/2018	8	02/04/2018	8E0085301
11/05/2018	524J Presentation Of Accounts & Statement Accounts Of Creditors' Voluntary Winding Up	11/05/2018	11	13/04/2018	8E0176402
12/07/2018	5011A Copy Of Minutes Of Meeting Of Members, Creditors, Contributories Or Committee Of Inspection Other Than Under S.436e Or S.439a	12/07/2018	15	27/06/2018	7EAC07816
19/07/2018	505R Notice By External Administrator/controller-Appoint/cease Resignation Or Removal Of Liquidator/provisional Liquidator	19/07/2018	2	16/07/2018	7EAC29621
13/08/2018	506L Notification Of Change Of Address Of Notification Of Change Of Address Of An External Administrator Or Controller Or Scheme Administrator	13/08/2018	5	13/08/2018	7EAD08868
04/06/2019	5602E Annual Administration Return Return Of Receiver	04/06/2019	4	02/04/2019	7EAL95345
10/07/2019	5602D Annual Administration Return Return Of Creditors' Voluntary Winding Up	10/07/2019	6	13/04/2019	7EAN28292
15/08/2019	5603E End Of Administration Return End Return Of Receiver	15/08/2019	3	13/08/2019	7EAO39921
15/08/2019	505K Notice By External Administrator/controller-Appoint/cease Receiver Ceasing To Act	15/08/2019	2	13/08/2019	7EAO39925
13/07/2020	5602D Annual Administration	13/07/2020	7	13/04/2020	7EAY48080

	Return Return Of Creditors' Voluntary Winding Up				
03/12/2020	5011A Copy Of Minutes Of Meeting Of Members, Creditors, Contributories Or Committee Of Inspection Other Than Under S.436e Or S.439a	03/12/2020	15	27/11/2020	7EBC81644
08/07/2021	5602D Annual Administration Return Return Of Creditors' Voluntary Winding Up	08/07/2021	8	13/04/2021	7EBJ29630
04/03/2022	5603D End Of Administration Return End Return Of Creditors' Voluntary Winding Up	04/03/2022	7	23/02/2022	7EBQ32598
04/03/2022	505R Notice By External Administrator/controller-Appoint/cease Resignation Or Removal Of Liquidator/provisional Liquidator	04/03/2022	2	23/02/2022	7EBQ32653

Note: Where the expression 'Unknown' is shown, the precise date may be available from records taken over on 1 January 1991 and held by ASIC in paper or microfiche.

*****End of Extract of 10 Pages*****

**ASIC**

Australian Securities & Investments Commission

Forms Manager

Registered Agents

Company: EUROKA ENERGY PTY LTD ACN 658 935 105

Company details

Date company registered 22-04-2022
 Company next review date 22-04-2023
 Company type Australian Proprietary Company
 Company status Registered
 Home unit company No
 Superannuation trustee company No
 Non profit company No

Registered office

C3 ACCOUNTING & ADVISORY, SUITE 15 LEVEL 1 , 13 NORVAL COURT , MAROOCHYDORE QLD 4558

Principal place of business

54 CHESTWOOD CRESCENT , SIPPY DOWNS QLD 4556

Officeholders

HUANG, YEN-WEN

Office(s) held: Director, appointed 22-04-2022
 Secretary, appointed 01-08-2022

WONG, KING

Office(s) held: Director, appointed 01-08-2022

Company share structure

Share class	Share description	Number issued	Total amount paid	Total amount unpaid
ORD	ORDINARY SHARES	2500	2500.00	0.00

Members

ZHENG , YAN

Share class	Total number held	Fully paid	Beneficially held
ORD	500	Yes	No

FARMER , JOHN

Share class	Total number held	Fully paid	Beneficially held
ORD	500	Yes	No

HUANG , YEN-WEN

Share class	Total number held	Fully paid	Beneficially held
ORD	500	Yes	No

MANCINI , JOSEPH BLANTON

Share class	Total number held	Fully paid	Beneficially held
ORD	500	Yes	No

WONG , KING LEONG

Share class	Total number held	Fully paid	Beneficially held
ORD	500	Yes	No

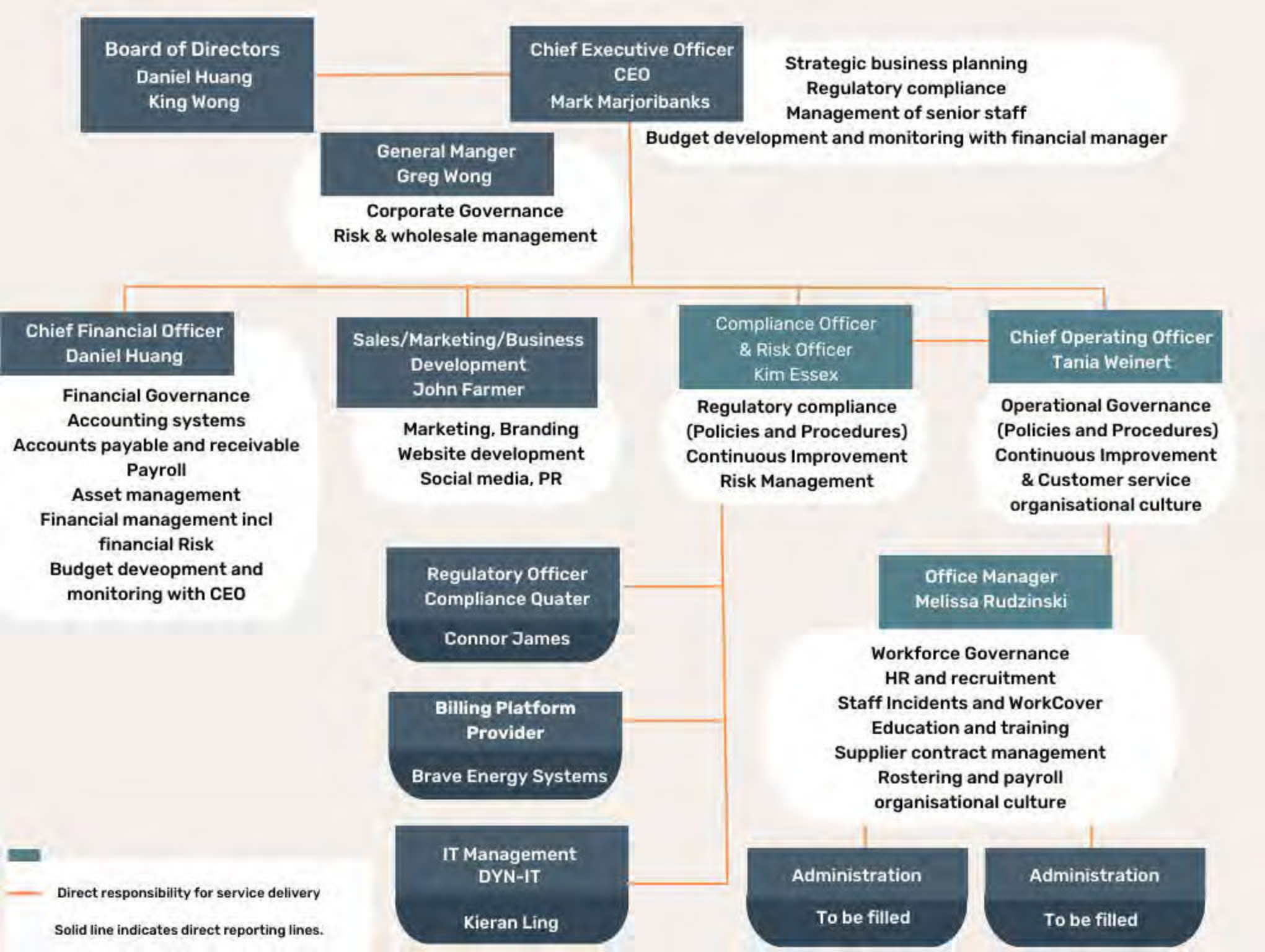
Document history

These are the documents most recently received by ASIC from this organisation.

Received	Number	Form	Description	Status
18-08-2022	7EBV53388	484	CHANGE TO COMPANY DETAILS	Processed and imaged
08-08-2022	7EBV18177	484	CHANGE TO COMPANY DETAILS	Processed and imaged
22-04-2022	2EZD74474	201	APPLICATION FOR INCORPORATION (DIVN 1)	Processed and imaged

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Compliance Policy

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	Compliance Quarter on 25/05/2022
Version 2	Final	Euroka Energy on 06/11/2023

Next Steps

Step	To be completed by
Client to review document	Euroka Energy Pty Ltd
Compliance Quarter to update based on client feedback	Compliance Quarter
Final approval by client	Euroka Energy Pty Ltd

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8.	External Consultants	7
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10.	Documentation	7
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14.	Employing Qualified Staff	10
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1. Introduction

- 1.1 Organisations that aim to be successful in the long-term need to maintain a culture of integrity and compliance. Compliance is an outcome of an organisation meeting its obligations.
- 1.2 This is the Compliance policy of Euroka Energy Pty Ltd and it sets out the compliance management system ('**CMS**') which is or will be used by Euroka Energy Pty Ltd to ensure compliance with all applicable legislation, regulations, licence conditions, codes, guidelines, rules, and standards that impact (or have the potential to impact) Euroka Energy Pty Ltd's operations (together '**Applicable Law**').
- 1.3 Euroka Energy Pty Ltd is committed to an effective compliance management system designed in accordance with Compliance Standard AS ISO 19600-2015.
- 1.4 Euroka Energy Pty Ltd's CMS is modelled on the following schematic:

Figure 1: Flowchart of a Compliance Management System (AS ISO 19600-2015)

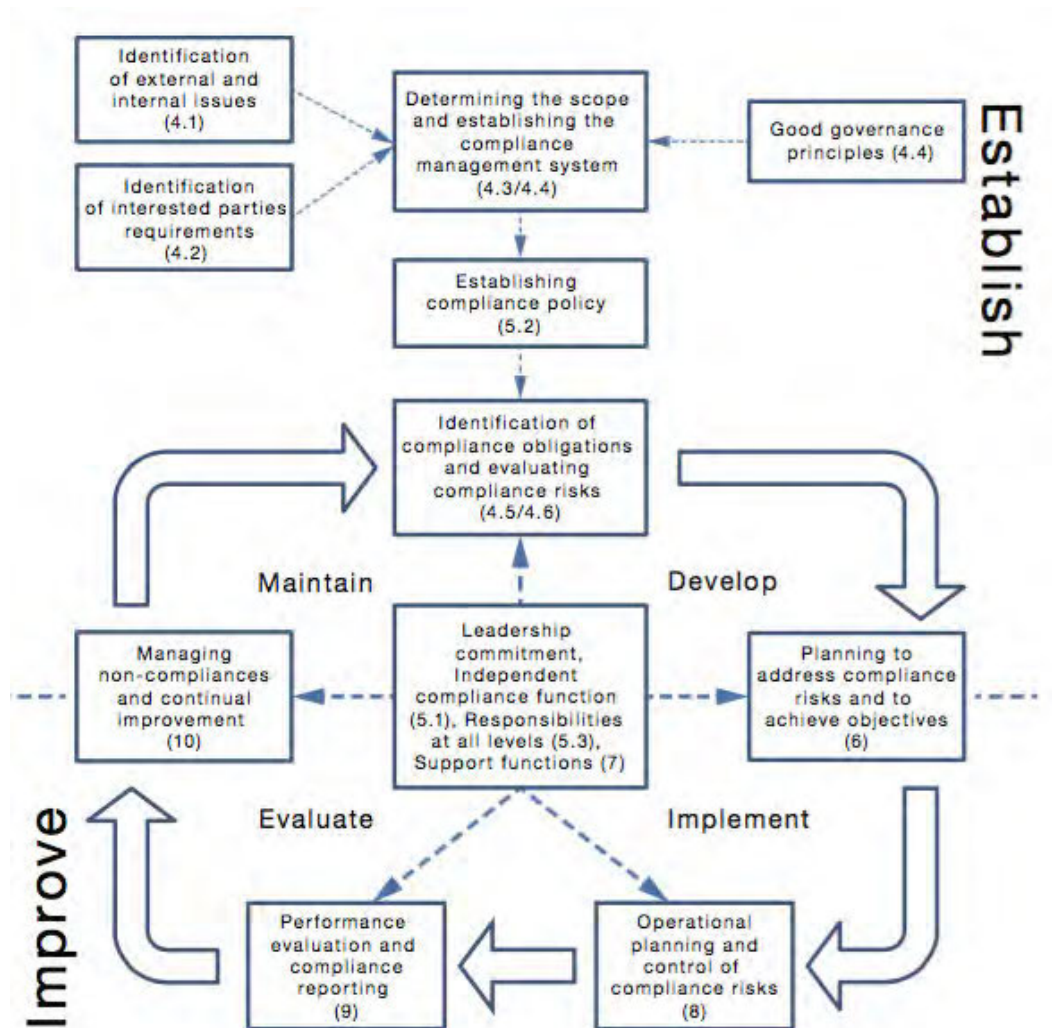


Figure 1 — Flowchart of a compliance management system

2. Purpose of The Compliance policy

- 2.1 The policy's primary purpose is to define the expectations of the business in the implementation of a CMS.
- 2.2 Our CMS is designed to ensure compliance with all applicable legislation, regulations, licence conditions, codes, guidelines, rules and standards that impact, or have the potential to impact, Euroka Energy Pty Ltd's operations.
- 2.3 Euroka Energy Pty Ltd's statutory obligations include those under Energy Law (such as the National Energy Retail Law, the National Energy Retail Regulations, and state derogations), The *Telecommunications Act 1997*, the *Do Not Call Register Act 2006* and the Australian Consumer Law (as set out in Schedule 2 to the *Competition and Consumer Act 2010*).
- 2.4 The secondary purpose of the policy is to set out the procedures and strategies which will operate to ensure compliance standards and requirements are operating in accordance with the CMS.

3. Nature of The Compliance policy

- 3.1 The policy represents Euroka Energy Pty Ltd's compliance philosophy, which is embedded in the CMS through its practices, operational policies, programs and processes. In their entirety, they demonstrate that Euroka Energy Pty Ltd's commitment to regulatory compliance, robust risk management approach and this is central to its zero appetite for regulatory & compliance risk.
- 3.2 Euroka Energy Pty Ltd's operational processes provide the mechanisms required to implement its compliance policies and practices.

4. Responsibilities

- 4.1 The Board has overall responsibility for the policy and the CMS which includes selecting and overseeing the corporate governance and compliance strategies that are carried out, on a day-to-day basis, by the Compliance Committee.
- 4.2 A compliance committee shall be formed by the Board, which committee shall be responsible for overseeing the implementation of the compliance program by reviewing existing controls, reviewing proposed and new regulation, and defining the scope of internal audit activities insofar as they relate to compliance, and shall include representatives from each of the Euroka Energy Pty Ltd legal and risk functions in addition to the compliance manager.
- 4.3 The Board member is responsible for reporting Compliance Committee decisions and minutes of meetings directly to the Board.
- 4.4 The Compliance Committee is responsible for:
 - 4.4.1 Developing and implementing the CMS through the creation and operationalisation of policies, procedures and training programs;
 - 4.4.2 Identifying new regulatory obligations and changes to existing regulatory obligations, along with ensuring that Euroka Energy Pty

- Ltd, through its employees and contractors, complies with these obligations;
- 4.4.3 Gathering information to investigate and resolve potential compliance breaches;
 - 4.4.4 Reporting potential compliance breaches to the compliance committee, Board and the Australian Energy Regulator ('AER'), in accordance with Euroka Energy Pty Ltd's CMS;
 - 4.4.5 Reviewing, overseeing, and enforcing the CMS via auditing, monitoring, and training;
 - 4.4.6 Directing the compliance manager to conduct compliance risk assessments as required, including audits, reviews, and remediation.
- 4.5 It is recognised that the Board owns the policy and the CMS developed and implemented by the Compliance Committee.
- 4.6 The Compliance Manager assists the Compliance Committee in identifying compliance risks and implementing appropriate controls.
- 4.7 Each Business Unit Manager ('BM') is accountable for compliance within their business units. Each BM has responsibility for ensuring that the unit staff understand the importance and relevance of the compliance program and are properly trained in procedures.
- 4.8 The applicable BMs for the purpose of this policy include Operations Manager, General Manager, Finance Manager, Compliance Manager.

5. Commitment to Compliance

- 5.1 Euroka Energy Pty Ltd's staff are required to comply with all industry regulations as a condition of employment.
- 5.2 To ensure staff compliance, training programs will be instituted on induction and in an ongoing manner to ensure that staff are aware of their obligations and are notified of any changes to these requirements.
- 5.3 External contracts with strategic partners and contractors also require compliance with applicable laws and regulations.
- 5.4 Euroka Energy Pty Ltd also recognises the importance of ensuring compliance when dealing with stakeholders, which include customers, regulators, government bodies, non-profit and community organisations and the wider community.
- 5.5 Euroka Energy Pty Ltd has a sharp focus on compliance and risk-assessment. This, together with its commitment to excellence, is what distinguishes Euroka Energy Pty Ltd in the industry.
- 5.6 Euroka Energy Pty Ltd is committed to ensuring that all staff, from the top down, operate within a compliance culture at all times.

6. Resources

- 6.1 To ensure compliance with all Applicable Law, Euroka Energy Pty Ltd will provide adequate resources which will be allocated as the need arises.

- 6.2 Resources currently used by Euroka Energy Pty Ltd include those described below.

7. Compliance Personnel

- 7.1 Compliance personnel are the staff responsible for overseeing the day-to-day implementation and maintenance of the policy and the CMS. Their activities include the following:
- 7.1.1 Interaction with regulators and other bodies to ensure they understand the Applicable Law together with pending changes to the Applicable Law and the impact of such changes on the Euroka Energy Pty Ltd business;
 - 7.1.2 Training;
 - 7.1.3 Creating and updating policies, standards, procedures and processes to ensure continued compliance with Applicable Law and best practice;
 - 7.1.4 Engaging external consultants for advice or review where necessary;
 - 7.1.5 Reviewing marketing material, contracts and other documentation; and
 - 7.1.6 Planning compliance presentations to be included at Management meetings or Board meetings, as appropriate.

8. External Consultants

- 8.1 As part of its CMS, Euroka Energy Pty Ltd regularly obtains advice on compliance and legal issues from various external consultants including law firms, financial advisors and compliance professionals.
- 8.2 In addition, Euroka Energy Pty Ltd will procure at three-yearly intervals a third party audit of its compliance policy and CMS and conduct annual reviews of its legislative compliance. Outcomes are to be incorporated into Euroka Energy Pty Ltd's compliance policy, CMS, and compliance training program.

9. IT

- 9.1 Euroka Energy Pty Ltd's IT services have been developed with regulatory compliance and organisational effect as core requirements.
- 9.2 Euroka Energy Pty Ltd's billing system will issue invoices and apply payments in accordance with relevant regulations.

10. Documentation

- 10.1 Euroka Energy Pty Ltd has developed documents, procedures and policies related to operational processes in order to ensure statutory compliance. These documents are provided to employees to ensure implementation of practices that are in accordance with the prescribed regulations.

- 10.2 Euroka Energy Pty Ltd's on boarding system includes the provision to new staff of all current policies, procedures and training which form part of the policy and the CMS.
- 10.3 Whenever a document has been changed or updated, Euroka Energy Pty Ltd will circulate the new document to all staff together with training where necessary.

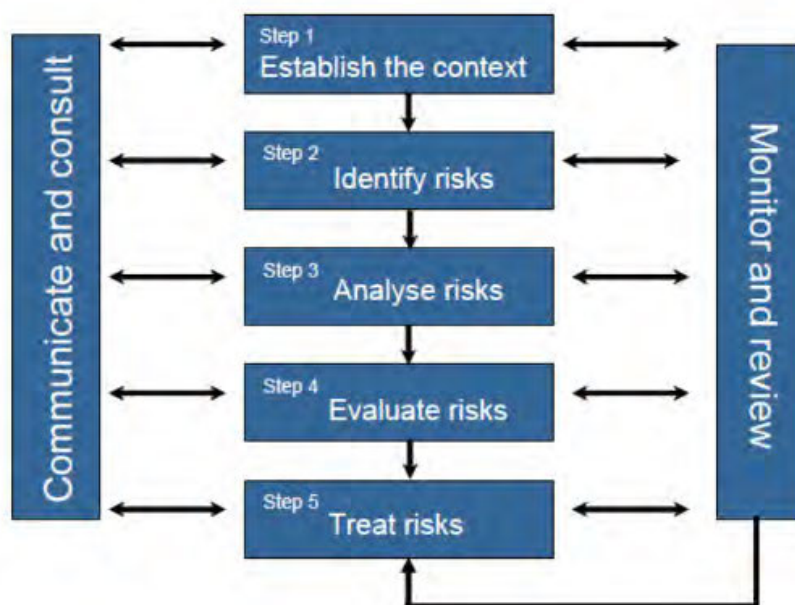
11. Obligations Register

- 11.1 AS ISO 19600-2015 states that organisation should systematically identify its compliance obligations and the implications for its activities, products and services. The extent to which an organisation documents its compliance obligations should be appropriate to its size, complexity, structure and operations.
- 11.2 Euroka Energy Pty Ltd operates in a highly regulated environment. The Compliance Manager is responsible for identifying all relevant compliance obligations and publishing them in the Obligations Register.
- 11.3 The Obligations Register will be updated on the basis of changes to laws and other compliance obligations. This will be achieved by:
 - 11.3.1 being on the mailing list of relevant regulators;
 - 11.3.2 maintaining membership of industry bodies;
 - 11.3.3 subscribing to relevant information services;
 - 11.3.4 attending industry forums and seminars;
 - 11.3.5 monitoring the website of regulators; and
 - 11.3.6 monitoring proposed regulation and decisions of courts and tribunals.

12. Compliance Risk Assessment

- 12.1 Risk assessments are conducted in accordance with the relevant standard AS ISO 19600-2015 and in particular 4.6 *Identification, analysis and evaluation of compliance risks*.
- 12.2 Compliance risks will be reassessed whenever there are:
 - 12.2.1 New or changed activities, products or services;
 - 12.2.2 Material changes to the structure or strategy of Euroka Energy Pty Ltd;
 - 12.2.3 Significant external changes, such as to financial-economic circumstances, market conditions, liabilities, and client relationships;
 - 12.2.4 Changes to compliance obligations; and
 - 12.2.5 Non-compliance.
- 12.3 An overview of the risk assessment process is shown in Figure 2 below. As the context is further defined, risks are identified, monitored, and controlled; it is intended to be a process of continual improvement.

Figure 2: Risk Assessment Process



Source: Chartered Secretaries of Australia

- 12.4 As a function of the compliance manager's risk management role, regular updates are provided to the compliance committee and Board via Management.
- 12.5 A number of compliance risks cannot be controlled, including human error. Therefore, Euroka Energy Pty Ltd actively seeks to identify and reduce the likelihood of residual risks and monitor remaining risks.
- 12.6 Residual risks that are identified in the compliance risk assessment must be reported to Management and the Board, as appropriate.

13. Training and Assessment

- 13.1 The aim of compliance training and assessment is to reinforce in all staff the understanding that regulatory compliance is core to Euroka Energy Pty Ltd's operations.
- 13.2 Business Unit Managers provide training opportunities to their staff to address initial, continual and unique requirements.
- 13.3 Such training is to be developed by the Compliance Manager, following the identification of a need for such training from the Compliance Risk Assessment report; the implementation of new laws, codes, or guidelines; and upon request from the Compliance Committee.
- 13.4 External training providers will be utilised where appropriate.
- 13.5 All training records will be kept for the purposes of organisation and accountability.
- 13.6 Compliance retraining will be undertaken whenever there is:
 - 13.6.1 Material change of position or responsibilities – affected staff only;

- 13.6.2 Material changes in internal policies, procedures or processes – all staff;
- 13.6.3 Material changes in organisational structure, where this change results in new policies or reporting lines – affected staff only;
- 13.6.4 Changes in the compliance obligations – all staff;
- 13.6.5 Changes in activities, products, or services – affected staff only; and
- 13.6.6 Whenever a breach is identified – relevant team or teams.

14. Employing Qualified Staff

- 14.1 Euroka Energy Pty Ltd will ensure that all staff have the qualifications and experience necessary to be competent in their roles and the commitment to function in compliance with all applicable laws. For example, employees working in legal or compliance areas must have, as a minimum, a Bachelor degree in law and two years of relevant experience.
- 14.2 Performance reviews are mandatory for all levels of staff and include analyses of positions to determine the currency of position descriptions governing work roles. Staff promotions and retention are dependent on commitment to regulatory compliance.
- 14.3 In performance reviews, training and development requirements of staff will be identified including those relating to statutory obligations, compliance and the minimisation of risk.

15. Monitoring Performance

- 15.1 Euroka Energy Pty Ltd will develop performance and compliance criteria based on the requirements and definitions provided by the regulators.
- 15.2 Euroka Energy Pty Ltd will develop performance and compliance criteria based on the requirements and definitions provided by applicable regulators.
- 15.3 In the avoidance of doubt, any potential breaches are reported upon, irrespective of risk rating.
- 15.4 Euroka Energy Pty Ltd will implement reporting procedures (and, where authorised by applicable law, anonymous reporting) for actual or suspected breaches of applicable law.
- 15.5 All staff must use the Breach Notification template (see **Schedule A**) and include a complete description of the breach, including suspected potential breaches, and any corrective action to date. The Breach Notification form must be sent to the compliance manager on the date the breach or suspected breach is identified or otherwise as soon as practicable in accordance with applicable law.
- 15.6 Euroka Energy Pty Ltd will implement appropriate procedures for investigating any such report and providing related reports to Management or the Board, as appropriate.
- 15.7 Specifically, all staff are required to report actual or suspected compliance breaches to the compliance manager, who will, upon investigation, escalate confirmed breaches to Management.

- 15.8 Management, in consultation with the compliance manager, will then conduct a review of the breach that has been brought to its attention and determine if:
- 15.8.1 It needs to be reported to a regulatory body;
 - 15.8.2 It needs to be reported to the Board; and
 - 15.8.3 Further remediation action is required.
- 15.9 In addition to compliance reporting, complaints management and review are an essential part of compliance monitoring and quality improvement. Complaints provide insight into the various issues faced by customers and the areas that need to be addressed.
- 15.10 On a quarterly basis, Euroka Energy Pty Ltd has an obligation to report on the number and categories of complaints received to the relevant jurisdictional regulators as set out in the AER's Compliance Procedures and Guidelines and the Essential Service Commissions' ('ESC') Compliance and Performance Reporting Guideline.
- 15.11 Reports prepared pursuant to the AER's Compliance Procedures and Guidelines and the ESC's Compliance and Performance Reporting Guideline will be reviewed by the compliance manager. The compliance manager may develop recommendations to Management resulting from such review including, for example, to strengthen compliance controls in relation to a specific area identified within a complaint.

16. Document Retention

- 16.1 Document retention is important for ensuring compliance and customer support. Documents will be retained in compliance with the relevant guidelines and legislation. These include the energy retail codes and Commonwealth Anti-Money Laundering and Counter Terrorism Financing Legislation. Generally, documentation will be retained for a period equal to the time a customer is current plus eight years. These records will be stored electronically and will be accessible for inspection.
- 16.2 Personal information kept for the purposes of marketing or promotional lists is subject to the *Privacy Act 1988*, the *Spam Act 2003*, 13 Australian Privacy Principles (March 2014) and the Euroka Energy Pty Ltd Privacy policy. Such lists will only be used after being filtered via the Do No Contact Register and Euroka Energy Pty Ltd's non-contact list. To allow individuals to opt out of promotional materials, the Company will establish and maintain a 'No Contact' list.
- 16.3 Information and documents containing third-party personal information will be maintained securely. In general, this information or documentation will be destroyed in keeping with regulatory obligations once the purpose for which it was collected has been satisfied.

17. Remedial Action and Controls

- 17.1 Remedial actions taken in response to individual incidents, including compliance breaches, will be recorded and reported in the compliance

reporting software. Remedial actions taken in response to systemic or serious breaches will be reported to the Board, as determined by Management, in consultation with the compliance manager.

- 17.2 In consultation with the compliance committee, the compliance manager will establish controls to reduce the likelihood of breaches, which include, for example, training and guidance materials; compliance controls will also be built into third-party contracts as necessary
- 17.3 Where risk cannot be minimised to a sufficient degree using a control, the risk may be transferred to a third party by a standard contract or contract of insurance. Despite the existence of external contracts, in cases where Euroka Energy Pty Ltd has the obligation for compliance, it assumes ultimate responsibility.
- 17.4 The compliance manager will review existing controls on an ongoing basis to ensure their continuing effectiveness and relevance.

18. Provision of Updates and Advice

- 18.1 The Compliance Manager is responsible for notifying relevant staff of new or updated compliance requirements and delivering appropriate training programs when major changes are introduced. The methods of delivery must be appropriate to the nature and complexity of the update.
- 18.2 Compliance obligations are reviewed on an ongoing basis. Through its Compliance Manager, Euroka Energy Pty Ltd subscribes to a number of regulatory newsfeeds, including those offered by third parties. These third parties include law firms, SAI global, and the regulators themselves.
- 18.3 Euroka Energy Pty Ltd's staff will play an active role in the development of new compliance obligations by attending and participating in industry events and consultations conducted by regulators and reviewing, at reasonable intervals, on-line information on regulations and their currency. The aim of this participation is to contribute to an improved regulatory environment for the company and beneficial outcomes for consumers and the community.

19. Review

- 19.1 The Board will review this policy at least every two (2) years.

20. Publication

This policy is not published and is available internally only.

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	Compliance Quarter on 25/05/2022

Schedule A: Potential Breach Notification Template

All staff have an obligation to report potential breaches to any of the obligations under Australian Energy Law and all other applicable laws. Euroka Energy Pty Ltd will treat seriously all potential breaches. Breaches may be reported directly to the Compliance Committee in cases where confidentiality or de-identification is required.

Potential Breach Notification Form

Name		Date	
Manager's Name		Date of Breach	
Compliance Contact		Date Resolved	

How and when was the potential breach first brought to your attention?

Which obligations may have been breached?

Please complete below

**ESC, NERR, NERL
Reference**
(compliance to complete)

State foreseen impact of the suggested changes.

What steps have been taken to resolve the breach?

Description	Completed?	Date Required	Resource Required
1.			
2.			
3.			
4.			
5.			

If breach has not been resolved, this section must be completed with the assistance of compliance

Who has been notified?

Manager

Compliance

Board

AER/ ESC

Who has been notified?	
<input type="checkbox"/> Manager	<input type="checkbox"/> Compliance
Justifications	

Signed by individual lodging report:

Signed by Manager:

Signed by Compliance Manager:



Compliance Reporting Procedure

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	Compliance Quarter on 25/05/2022
Version 2	Final	Euroka Energy on 06/11/2023

Next Steps

Step	To be completed by
Client to review document	Euroka Energy Pty Ltd
Compliance Quarter to update based on client feedback	Compliance Quarter
Final approval by client	Euroka Energy Pty Ltd

1. Introduction

- 1.1 Euroka Energy Pty Ltd (**Euroka Energy**) is committed to an effective compliance program designed in accordance with the principles set out in the relevant Standard, AS ISO 19600:2015.
- 1.2 Monitoring changes to obligations and compliance breaches is a key component of Euroka Energy Pty Ltd's compliance program.
- 1.3 Euroka Energy Pty Ltd is committed to undertaking a continual process of monitoring, review and implementation of controls to ensure compliance.
- 1.4 Reporting on compliance breaches will be conducted in accordance with this procedure and the Australian Energy Regulator (**AER**) Guidelines (and applicable law).

2. Purpose of this Procedure

- 2.1 This procedure confirms Euroka Energy Pty Ltd's commitment to complying with the applicable laws, guidelines and policies.
- 2.2 This procedure sets out the way in which compliance related data will be sent to the AER. This data relates to any compliance breaches including the dates by which reports must be submitted.
- 2.3 This Policy demonstrates Euroka Energy Pty Ltd's commitment to report in accordance with the Procedures and Guidelines and National Energy Retail Law (**NERL**).
- 2.4 Section 206 of the NERL provides the AER with powers to obtain information from regulated entities. Under this section, the AER can obtain information and documents where it has reason to believe that a person or regulated entity is capable of providing information or producing a document that the AER requires for the performance or exercise of a function or power under the NERL, the National Energy Retail Rules (**NERR**), or the National Energy Retail Regulations. Euroka Energy Pty Ltd will comply with this obligation.

3. Responsibilities

- 3.1 All staff are required to comply with these procedures and all other policies and procedures, as well as the NERL and NERR.
- 3.2 All staff will receive initial (on induction) and ongoing regular compliance training, as relevant to their positions.
- 3.3 All staff will have access to the Compliance Manager who is conversant with Compliance Policy.
- 3.4 In accordance with their employment contracts, all employees have an obligation to report on any suspected breaches of compliance and of any other policies and procedures.
- 3.5 The Board has overall responsibility for setting and overseeing the corporate governance and compliance standards. The Compliance Committee carries out this function on a day-to-day basis.
- 3.6 Business Unit Management is responsible for accountability for compliance within their Business Units by ensuring all staff are aware of, and understand, the importance and relevance of the compliance program.
- 3.7 The Compliance Committee will oversee and gather information on any compliance breaches. In accordance with this Procedure, they will then produce the required reports ready for submission to the AER.
- 3.8 The Board has responsibility for sign off on all compliance reports and must be satisfied as to their accuracy prior to submission to the AER.

4. Monitoring Compliance Breaches (NECF Jurisdictions)

- 4.1 The guiding regulatory document, The AER Compliance procedures and guidelines version 6 (September 2018) (Reporting Guideline), sets out three types of reports (refer to Schedules B and C of this Procedure for details of obligation)
 - a. Immediate reports obligations are those listed in Table 1 Appendix A.1 of the Reporting Guideline and reproduced below;
 - b. Quarterly reports obligations are those listed in Table 3 Appendix A.2 of the Reporting Guideline and reproduced below; and
 - c. Half yearly reports obligations are listed in Table 5 Appendix A.3 of the Reporting Guideline and reproduced below.
- 4.2 In monitoring compliance breaches, we will develop performance and compliance criteria based on the regulatory monitoring requirements and definitions provided in all regulatory documentation.
- 4.3 To avoid doubt, we will report potential breaches or events that may or may not fall within regulatory definitions as a matter of course.
- 4.4 Compliance breaches will be reported no matter what risk rating these events have.
- 4.5 Regulatory reporting will focus on transparency. Potential Breach reporting will be used to improve the compliance program and subsequent business practices.
- 4.6 All staff must use the Potential Breach Notification template, in Schedule A, and include a full description of the potential breach, circumstances and action already taken to rectify the breach.
- 4.7 The Potential Breach Notification form must be sent to the Compliance Manager on the day that a potential breach is identified.
- 4.8 All staff will carry out monitoring with the assistance of software to report on and record all potential compliance breaches.
- 4.9 The Compliance Committee in consultation with the Compliance Manager will develop tolerances and definitions of breaches and build these into reporting software.
- 4.10 Assessments will also be conducted by Business Unit Managers to assist the Compliance Manager in identifying potential compliance breaches and needs for further training.
- 4.11 All complaints received either directly from customers or potential customers and a jurisdictional energy ombudsman are reviewed for compliance breaches or potential compliance breaches.
- 4.12 Complaints provide a valuable insight into the areas of the business that needs development and can be an early warning of a potential compliance breach.
- 4.13 The Compliance Committee is responsible for reviewing all complaints to determine any actual, potential or likely compliance breaches.
- 4.14 As required, an auditor will be engaged by the Compliance committee to review the compliance program and controls.

5. Reporting deadlines (NECF Jurisdictions)

- 5.1 The Reporting Guideline out the deadlines that must be observed in submitting reports to the AER.

Frequency of reporting on Immediate reports obligations

- 5.2 Subject to clause 3.7 of the Reporting Guideline all breaches of Immediate reports obligations contained in the relevant tables in the Reporting Guideline (Table 1 at Appendix A.1) must be initially reported to the AER within 2 business days of the event being identified or reported.
- 5.3 Upon receipt of an initial report, the AER will advise whether further information is required, and if required Euroka Energy Pty Ltd will submit a final report within 20 business days after the initial report.

Frequency of reporting on Quarterly reports obligations

- 5.4 All breaches of contained in Table 3 at Appendix A.2 must be reported in writing to the AER on a quarterly basis:
- a. The quarterly report for the period 1 July to 30 September must be submitted to the AER no later than 31 October in each year;
 - b. The quarterly report for the period 1 October to 31 December must be submitted to the AER no later than 28 February in each year;
 - c. The quarterly report for the period 1 January to 31 March must be submitted to the AER no later than 30 April in each year; and
 - d. The quarterly report for the period 1 April to 30 June must be submitted to the AER no later than 31 August of each year.
- 5.5 The AER may alter the reporting frequency for obligations with a quarterly classification by either increasing, if another breach has occurred, or decreasing, if no other breach has occurred, the reporting period. Euroka Energy Pty Ltd will be given notice of the proposed variation and will have 30 business days to respond. The AER will consider the response prior to deciding about the variation. If the AER decides to vary the reporting period, the decision will be made no later than three months prior to the commencement of the reporting period (see Variation of reporting frequency for individual regulated entities cl 3.25 to 3.32).

Frequency of reporting on Half yearly reports obligations

- 5.6 All breaches of half yearly regulatory obligations contained in Table 5 at Appendix A.3 must be reported in writing to the AER on a half yearly basis.
- a. The half yearly report for the period 1 July to 31 December must be submitted to the AER no later than 28 February in each year; and

- b. The half yearly report for the period 1 January to 30 June must be submitted to the AER no later than 31 August in each year.

6. Form and submission of reports (NECF Jurisdictions)

Immediate reports

- 6.1 When an immediate report obligation breach has occurred, a written report must be submitted to the AER using Compliance Reporting Template at Appendix B.1.
- 6.2 The report should be signed by the CEO or MD and if it is not, a final report (submitted in accordance with clause 3.8) must be signed by the CEO or MD.

Immediate reports under clause 3.7 or 3.8 must be submitted by email to AERCompliance@aer.gov.au, with subject heading “ Euroka Energy: IMMEDIATE REPORT - BREACH OF REGULATORY OBLIGATION ”

Quarterly and half yearly reports

- 6.3 Written reports must be prepared using the pro-forma at Appendix B.2 and the Compliance Reporting Template at Appendix B.3.
- 6.4 Such reports must contain the information specified in the Guideline and be signed by the CEO or MD.
- 6.5 Compliance Breaches may be grouped as a single entry into a reporting template where the breaches have arisen from: (a) a single error or incident, or where multiple customers have been affected by the same breach or incident; or (b) the same cause, for example, a recurring error or systemic issue.
- 6.6 Where breaches are grouped, the report must specify the number of individual breaches and full details as required under clause 3.19 of the Guideline.

Written reports on obligations under clauses 3.9 and 3.11 must be submitted by email to AERCompliance@aer.gov.au, with subject heading “Euroka Energy Pty Ltd: RETAIL LAW COMPLIANCE REPORT [quarterly or half yearly] (as applicable)”

7. Compliance Audits

- 7.1 In accordance with our Compliance Policy, the Compliance Team will conduct regular internal audits with results provided to the Board.
- 7.2 Internal audits will examine all areas of compliance with applicable energy laws and with our own internal procedures and policies.
- 7.3 Breaches of compliance obligations will be reported to the AER (as required) in accordance with this Procedure.

- 7.4 Under the AER Compliance Procedures and Guidelines, it is recognised that the AER has the power to carry out a compliance audit, arrange for a third party to audit or require us to conduct a compliance audit.

Version Control

Version	Amendment	Author and date
Version 1		Compliance Quarter on 25 May 2022

Schedule A: Potential Breach Notification Template

All staff are required to report potential breaches to any of the obligations articulated under Australian Energy Law and all other applicable laws.

Euroka Energy Pty Ltd will treat all potential breaches seriously.

Breaches may be directly reported to the Compliance Committee in order to preserve the anonymity of the person doing the reporting.

Potential Breach Notification Form

Your Name		Date	
Your Manager		Date of breach	
Compliance contact		Date resolved	
How and when was the potential breach brought to your attention?:			
What disruption or impact has the breach caused to customers?:			
Which obligations may have been breached?:			
Please complete below			NERR, NERL reference (compliance to complete)

<i>State foreseen impact of the suggested changes.</i>	

What steps have been taken to resolve the breach?			
Description	Completed?	Date Required	Resource Required
1.			
2.			
3.			
4.			
5.			
<i>If breach has not been resolved, this section must be completed with the assistance of compliance</i>			

Who has been notified	
<input type="checkbox"/> Manager	<input type="checkbox"/> Compliance
<input type="checkbox"/> Board	<input type="checkbox"/> AER
Reasons for notifications:	

Who has been notified

Manager

Compliance

Signed:

Signed by Manager:

Signed by Compliance:

Schedule B: Immediate reports – regulatory obligations summary

A.1 Immediate reports – regulatory obligations

Table 1: Retailers - obligations requiring immediate notification

Provision	Description
Retail Rules, Part 6, Divisions 1 and 2, Rules 107(2)* and 116(1)	Retailer-initiated de-energisation of premises – small customers
Retail Rules, Part 7, Rule 124(1), (3) and (6) Rule 124A Rule 124B(1) Rule 125(1), (2), (4), (6)	Retailer obligations, life support equipment
Retail Rules, Part 8, Rule 139(2)	Prepayment meters, Life support equipment

Schedule C: Quarterly reports and Half yearly reports regulatory obligations Summary

A.2 Quarterly reports – regulatory obligations

Table 3: Retailers obligations reportable in quarterly reports

Provision	Description
Retail Rules, Part 6 Divisions 1 and 2, Rules 107(2)*, 111–115, 117-118	Retailer-initiated de-energisation of premises – small customers
Retail Rules, Part 6, Division 4, Rule 121	Obligation on retailer to arrange re-energisation of premises
Retail Law, Part 2 Division 5, Sections 38 ^A and 40	Explicit informed consent
Retail Rules, Part 2 Division 9, Rules 57(1)(a) and 57A	
Retail Rules, Part 2 Division 7, Rule 46A	

A.3 Half yearly reports – regulatory obligations

Table 5: Retailers - obligations reportable in half yearly reports

Provision	Description
Retail Law, Part 2, Division 6, Sections 43(2)(c), and 43(3)(b)(iv)	Customer hardship
Retail Rules, Part 3, Rules 71-74	
Retail Law, Part 2, Division 7	Payment plans
Retail Law, Part 2, Division 8, Section 53(2)**	Energy marketing activities
Retail Rules, Part 2, Division 10 Rules 60 - 68	
Retail Rules, Part 2, Division 4, Rules 21,24, 25, 26, 28, 29, 30, 31	Customer Retail contracts—billing
Retail Rules, Part 2, Division 7, Rules 46, 47(2), 47(5), 47(6), 48, 48A, 49,50	Market retail contracts—particular requirements
Retail Law, Part 2, Division 4, Section 37	
Retail Rules, Part 2, Division 9, Rules 59A(1)-(3) and (7)	Notice to small customers on deployment of new electricity meters
Retail Rules, Part 2, Division 9A, Rules 59C(2)-(5)	Retailer interruption to supply

** Section 53(2) is the over-arching civil penalty provision that requires persons carrying out energy marketing activities to comply with the Energy Marketing Rules specified in Part 2, Division 10 of the Retail Rules. Businesses reporting a breach or potential breach of energy marketing activity that is not conducted in accordance with Part 2, Division 10 of the Retail Rules should also report it as a breach of section 53(2) of the Retail Law.



Complaints Policy

1. Version Control

Version	Amendment	Author and date
Version 1	Initial draft	Compliance Quarter on 25/05/2022
Version 2	Final	Euroka Energy on 06/11/2023

2. Next Steps

Step	To be completed by
Client to review document	Euroka Energy Pty Ltd
Compliance Quarter to update based on client feedback	Compliance Quarter
Final approval by client	Euroka Energy Pty Ltd

Euroka Energy Pty Ltd Standard Complaints and Dispute Resolution Procedure

3. Introduction

Euroka Energy Pty Ltd is an energy retailer operating in NSW, QLD, TAS and SA. This document sets out our procedures for accepting, recording, and resolving complaints.

We are committed to receiving and resolving complaints in an accessible and transparent way. Through this document, we make the commitment to continual quality improvement by taking into consideration the data provided by an effective complaints management system. We will review complaints on an ongoing basis to identify any potential non-compliance and areas for improvement.

4. Definition of Complaint

A complaint is an expression of dissatisfaction that can be received on the basis of products and/or services provided by us or our agents, contractors, and other representatives, or due to perceived inadequacies in the complaints handling process itself.

We will consider all complaints as opportunities to improve, and they will be freely received by telephone, in writing (for example, letter, email, facsimile) or in person.

Complaints may be raised in relation to (amongst other areas), any:

- Failure by us to observe our published or agreed practices or procedures;
- Failure in respect of a product or service offered or provided by us or our representatives;
- An instance where you involve or seek information about a third party, such as the jurisdictional energy ombudsman or a Member of the Parliament; and
- An occurrence where a complaint is directed to us your behalf by an energy ombudsman.

When a complaint relates to more than a single aspect of our services or products, a separate charge will be recorded for each aspect.

5. Complaints Management

The guiding principles for our complaints management program are contained in AS/ISO 10002-2014 (Customer Satisfaction – Guidelines for Complaints Handling in Organisations).

6. Promoting our Complaints Management Program

We will publish this Standard Complaints and Dispute Resolution Procedure on our website, and it will be actively brought to the attention of customers.

We are committed to promoting and ensuring the visibility of our complaints management program. To achieve this, we will:

- Make this procedure available free of charge;
- Arrange for an interpreter to expound the procedures and facilitate the resolution of complaints;
- Make special arrangements for people with disabilities, ensuring that they and their advocates have access to this procedure and are aided in the resolution of their complaint. The process and other documentation will be available in large print Braille or audiotape on request; and
- Ensure that all relevant staff members are trained to resolve complaints and have access to resources for cross-cultural communication and communication with customers with special needs.

7. Responsiveness

Once a complaint has been received, one of our personnel will immediately acknowledge the complaint and prioritise it for resolution. Higher priority will be given to those complaints where there is perceived financial hardship, the disconnection of energy supply, and matters relating to health and safety. In such instances, we will respond as soon as possible.

In all instances, we will

- Freely accept complaints lodged on our website, in person, or by telephone, facsimile, email, or letter;
- Acknowledge any complaint received as soon as possible;
- Begin an investigation into the reasons for a complaint within 24 hours of acknowledgment;
- Keep you updated about the investigation and any proposed resolution;
- Notify you as soon as possible of the outcome of our investigation and any proposed resolution; and
- Provide you with the option of an internal review of your complaint if you are unsatisfied

with the outcome of the investigation or the proposed resolution.

8. Responsibilities

All of our staff must comply with this procedure as well as the Retail Law and Retail Rules and any Guidelines or Procedures published by the Australian Energy Regulator (AER) or the Australian Energy Market Operator (AEMO). Complaints can be made to any Euroka Energy Pty Ltd employee or contractor. That employee or contractor is then required to report any complaints received to the Customer Service Manager.

All employment contracts will stipulate that employees are obligated to report on any suspected compliance breaches. We will ensure that complaint management is not hindered by a lack of resources. We will also ensure that adequate programs are in place to train staff in complaint resolution and the implementation of this procedure.

Top-level management of Euroka Energy Pty Ltd is responsible for:

- Establishing the complaints management program;
- Establishing and implementing the process of complaints management;
- Allocating resources to ensure compliance with obligations under applicable laws and this procedure;
- Promoting and advocating a customer-centric approach to complaint resolution;
- Reporting to the board on the management of complaints, including the number and nature of complaints received;
- Continually reviewing the effectiveness of the complaints management program, including the program's processes; and
- Establishing an adequate training program to ensure all relevant staff, agents, contractors, and other representatives comply with this procedure.

9. Recording Complaints

Complaints are recorded in our customer management system as soon as they are received. Complaints and all relevant information will be recorded, and a unique identifier will be provided. Each recording will include:

- Your requested resolution
- The date of your complaint
- A description of your complaint
- The expected date for a response or resolution
- The established priority of your complaint

More than one complaint can be made per customer/call. For example, if a customer makes a billing complaint and then makes a marketing complaint during the same call, two complaints will be recorded. Each individual customer contact with a complaint will be recorded and categorised as one, irrespective of the number of times a caller has contacted us on an issue.

Complaints will be tracked from the time they are received to their resolution. When tracking the resolution of complaints, we will make sure to meet response deadlines. We will keep you informed and updated regularly throughout the process.

10. Monitoring and Improving

Complaints will be tracked at individual and group levels. Any systemic issues that are identified will be brought to the attention of the Compliance Committee and Board during their monthly meetings.

Euroka Energy Pty Ltd's board will direct top-level management to address systemic issues that are identified during a complaint process.

11. A Customer's Right to Complain

As a customer, you have the right to lodge a complaint at any time. Once your complaint is received, it will be dealt with in accordance with this procedure.

12. Internal and External Escalation

At any time, you may request an internal escalation of your complaint, which will be granted. Complaints will also be escalated where they are complex, urgent, or sensitive. When your complaint is received, you will be informed that you have the right to escalate it if you are dissatisfied with the process. Individual staff who manage complaints will be required to review the complexity, urgency, and sensitivity of all complaints and seek assistance from a supervisor or specialist where required.

If you are not satisfied with our response to your complaint or you wish to seek independent advice about a complaint, we will notify you that you can contact the Energy Ombudsman in your State.

We will provide the contact details for the Energy Ombudsman schemes and will assist you in lodging a complaint with them.

13. Our Commitment to Customers

In all instances, we will:

- Treat you with respect;
- Take your complaint seriously;
- Respect your privacy;
- Manage your complaint with impartiality;
- Properly investigate and report on your complaint;
- Resolve your complaint with proper consideration to facts;
- Provide the option of internal escalation or a referral to an energy ombudsman scheme when requested or appropriate; and
- Ensure equal access to our complaints management program and fair resolutions.

You have rights under various laws, including the Competition and Consumer Act 2010 (Cth), and the Energy Law. We will ensure that those rights are respected.

14. Customer Read Estimates

If you are a “small customer” with an accumulation meter, you have the right to conduct your own meter reading if your bill is based on an estimate. This self-read is known as a “customer read estimate.” You can find more information on customer read estimates at [\[insert link\]](#).

Where we have not accepted a customer read estimate, we will notify you of the reasons for the decision and allow the opportunity to rectify the self-read.

We will deal with complaints regarding customer read estimates in accordance with our standard complaints process, which is outlined in this procedure.

15. Contact Us to Lodge a Complaint

You may contact us at any time to lodge a complaint using the following contact details:

Our contact details:

[\[insert contact details\]](#)

Interpreter: 131 450 - For help using an interpreter, visit TIS.

NRS: 133 677 - For help using this service, visit NRS.

16. Contact details for the Energy Ombudsman Schemes

If you are not satisfied with our response or investigation into a complaint, you may contact the Energy Ombudsman in your state. We will provide you with the contact details of your Energy Ombudsman if needed.

Energy and Water Ombudsman of NSW

By Post: PO Box 1343, Haymarket NSW 1240.

Freepost: Reply Paid 86550, Sydney South NSW 1234.

Free call: 1800 246 545

Free fax: 1800 812 291

complaints@ewon.com.au

Interpreter: 131 450 - For help using an interpreter, visit TIS.

National Relay Service: 133 677 - For help using this service, visit NRS.

Energy and Water Ombudsman Queensland

Freecall: 1800 662 837

Translation services: 131 450 - For help using an interpreter, visit TIS.

National Relay Service: 133 677 - For help using this service, visit NRS.

Fax: (07) 3006 2670

Online: <http://www.ewoq.com.au/submit-a-complaint>

Email: complaints@ewoq.com.au or info@ewoq.com.au

In person: Level 16/53 Albert Street, Brisbane City QLD 4000

Energy and Water Ombudsman South Australia

Freecall: 1800 665 565

National relay service: 133 677

Translating and interpreting service (TIS): 131 450

Post: GPO Box 2947 Adelaide SA 5001

Office address (strictly by appointment only): Level 11, 50 Pirie Street Adelaide SA 5000

Online: <https://ewosa.com.au/submit-a-complaint>



Code of Ethics

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	Compliance Quarter on 25/05/2022
Version 2	Final	Euroka Energy on 06/11/2023

Next Steps

Step	To be completed by
Client to review document	Euroka Energy Pty Ltd
Compliance Quarter to update based on client feedback	Compliance Quarter
Final approval by client	Euroka Energy Pty Ltd

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1. Agreement

- 1.1 This Code of Ethics is the defined standard of behaviour that can be expected from members of the board, employees, agents, contractors and partners of Euroka Energy Pty Ltd.

- 1.2 Training regarding the contents and meaning of this Code will be made available to all relevant staff on induction, and agents, contractors and partners at the time of engagement.
- 1.3 **This document is to be signed by all members of the board, employees, agents, contractors and partners of Euroka Energy Pty Ltd.**

2. The Code

- 2.1 At all times those who are covered by this Code of Ethics will:
- a. Act with honesty, integrity and probity;
 - b. Not knowingly mislead anyone, including colleagues, clients, and regulators;
 - c. Comply with all relevant Commonwealth, State and Territory laws;
 - d. Comply with any relevant laws of other countries;
 - e. Avoid any potential conflicts of interest and where a potential conflict of interest is likely, disclose the potential conflict of interest to relevant parties;
 - f. Not improperly use their position, property or information acquired through their position for personal gain or the gain of an associate;
 - g. Not accept bribes, inducements, or hidden commissions;
 - h. Foster a culture of compliance and good corporate citizenship generally;
 - i. Report all corrupt, illegal and unethical conduct to the appropriate and identified person within the organisation;
 - j. Respect and implement the principles of equal opportunity and diversity;
 - k. Encourage a culture of openness and trust;
 - l. Protect the confidentiality of information made available to them within the guidelines set by the company's Privacy Policy;
 - m. Make a commitment to continuous improvement to meet, or exceed, all relevant legal, industry, safety, environment and other statutory requirements;
 - n. Undertake training provided so that they understand their duties and obligations and how they are to be performed;
 - o. Provide a high standard of service to all they deal with in performing their duties.

3. Implementation

- 3.1 Euroka Energy Pty Ltd will ensure implementation of this Code of Ethics by conducting training for staff and contractors and review adherence to this Code of Ethics via the Internal Audit function.

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	Compliance Quarter on 25/05/2022



Customer Hardship Policy

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1. Introduction

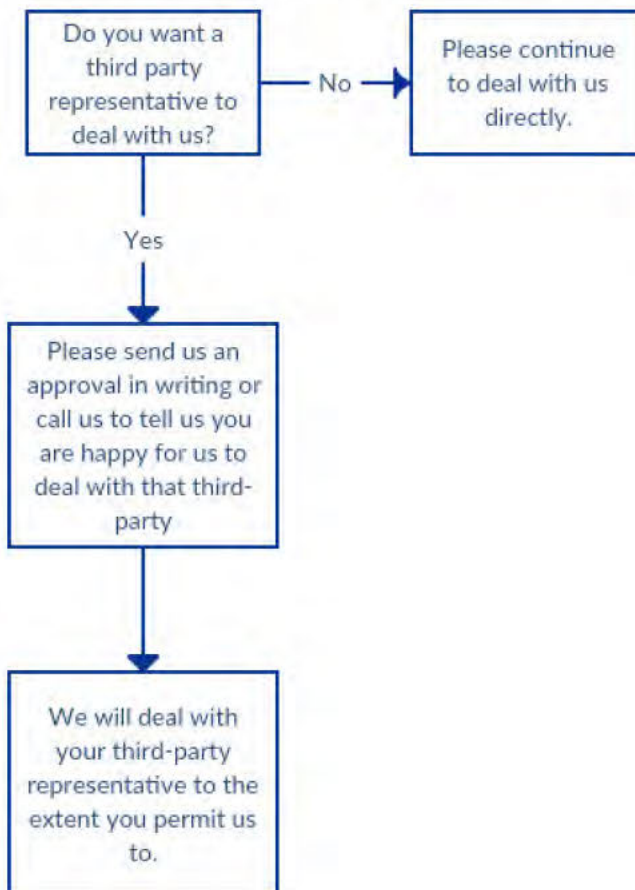
- 1.1. This Policy applies to all residential customers living in Queensland, New South Wales, the Australian Capital Territory and South Australia who find it hard to pay their energy bills due to hardship. You might experience hardship because of factors like:
 - 1.1.1. Death in the family
 - 1.1.2. Household illness
 - 1.1.3. Family violence
 - 1.1.4. Unemployment
 - 1.1.5. Reduced income
- 1.2. This Policy explains:
 - 1.2.1. What we will do to help you manage your energy bills
 - 1.2.2. How we consider your circumstances and needs
 - 1.2.3. Your rights as a customer in our hardship program

- 1.3. You can ask a support person to contact us, such as:
 - 1.3.1. A financial counsellor
 - 1.3.2. Someone who helps you manage you energy bills

1.4. We need your permission to talk to your support person.

Support Person

- 1.5. You may provide your permission for us to deal with a third party support person via whatever means are convenient to you.
- 1.6. you would like a support person to represent you, you may request this at any time, and we will send a consent form or phone you to ensure that you consent (we will accept consent via whatever means are convenient to you).
- 1.7. Where you have elected a support person to act on your behalf, we will engage with that support person as we would with you.
- 1.8. The diagram below summarises our approach.



2. About our hardship Policy

- 2.1. We support customers who are experiencing hardship. Electricity an essential service, so it is important we do as much as we can to help you maintain access to your supply of electricity.
- 2.2. We have developed this Hardship Policy in accordance with the AER’s Hardship Guideline to provide consistent and compliant support to all our customers. We

believe early intervention is the best way to help customers who face financial difficulty pay their bills and prevent an accumulation of energy debt which could ultimately threaten a customer's energy supply.

2.3. We have systems in place to ensure that we meet our obligations with respect to customer hardship in:

- 2.3.1. The National Energy Retail Law
- 2.3.2. National Energy Retail Rules
- 2.3.3. The AER Customer hardship Policy Guideline
- 2.3.4. The Customer Hardship policy

3. Our Hardship commitment

3.1. As an Euroka Energy customer, we will:

- 3.1.1. Provide you with clear information in a timely manner on what assistance is available to you under this Policy
- 3.1.2. As soon as reasonably practicable, provide you with the assistance you are entitled to under this Policy
- 3.1.3. Be respectful, compassionate and treat your circumstances with sensitivity and respect for your privacy
- 3.1.4. Take into account all of your circumstances which we are aware of, and, on that basis, act fairly and reasonably
- 3.1.5. Provide you equitable access to this Policy and ensure that it is consistently applied in a transparent way
- 3.1.6. Waive any late payment fees if you are a participating in the Hardship Program
- 3.1.7. Maintain customer assistance programs, such as affordable payment plans
- 3.1.8. Regularly monitor your account during your participation in our hardship program, including quarterly reviews of your payment plan to make sure it remains affordable and you are receiving the right assistance at the right time
- 3.1.9. Be transparent and accessible and communicate to you, your nominated support person, financial counsellors and community assistance agencies when necessary
- 3.1.10. Not disconnect your energy supply while you are actively participating in our hardship program

4. Accessing our Hardship Policy

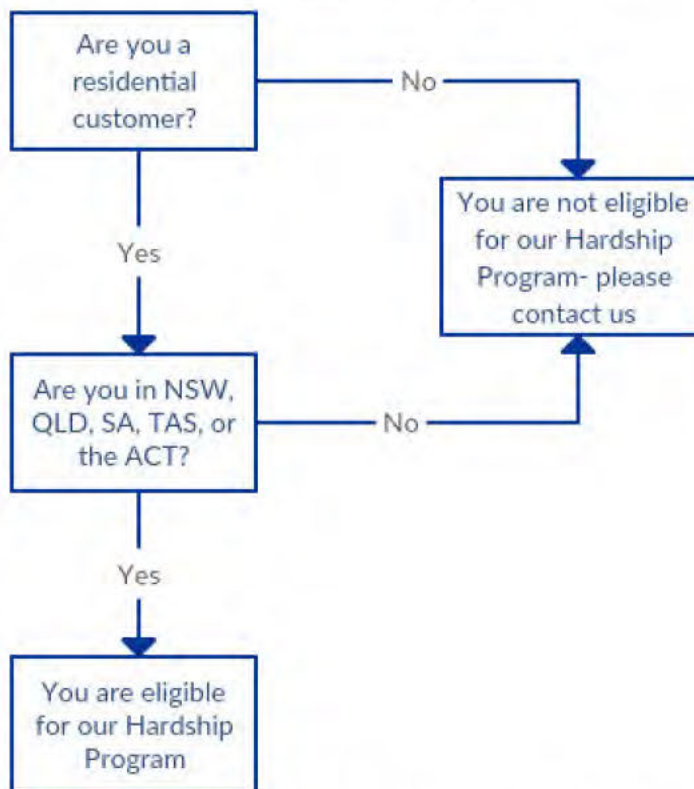
- 4.1. We will inform you of our hardship policy as soon as practicable after we have identified you as a hardship customer.
- 4.2. You can access a printable version of our Hardship Policy via the URL/hyperlink on the homepage of our website. You can also download an electronic copy of this

Hardship Policy at {Company_Website}. If you are unable to access our website, we can provide you with a copy of this policy for free in another way. Please contact us if you would like us to provide you with a copy by email, or send you a copy by post.

- 4.3. If you have specific communication requirements, such as limited internet access, low proficiency in English, residence in a remote area, or a need for an interpreter, please inform us and we will work with you to ensure that you can access our hardship policy.

5. Eligibility for Euroka Energy's Hardship Program

- 5.1. A customer experiencing hardship is a residential customer who would like to pay their energy bill but does not have the financial capacity to do so at that point in time. This situation can arise as a result of a variety of factors, both long and short term, and some of them are set out in the introduction to this policy.
- 5.2. If you are experiencing an inability to pay your Euroka Energy energy bill for whatever reason, please contact us.
- 5.3. We will direct customers to this Policy and our Hardship Program if we believe they might be experiencing hardship.
- 5.4. The diagram below sets out whether you are eligible to participate in our hardship program:



- 5.5. If we decide that you are ineligible for our Hardship Program, we will contact you and let you know of the reasons why.

6. Re- Entry into Euroka Energy's Hardship Program

- 6.1. If you have previously been removed from or chose to leave our hardship program, but then want to re-enter, your application for entry will be assessed as if you were entering the hardship program for the first time. That is, your eligibility will be assessed based on whether you are experiencing financial difficulties due to hardship and meet the eligibility requirements above.
- 6.2. In no case will we refuse you entry into our Hardship Program on the basis of a need for you to meet any special condition.

7. What we will do to help you

- 7.1. We will tell you about our hardship program if:
 - 7.1.1. You tell us you are having trouble paying your bill
 - 7.1.2. You are referred to our program by a financial counsellor or other community worker
 - 7.1.3. We are concerned that you may be experiencing financial hardship.
- 7.2. We will recommend you speak to a staff member to help you join our hardship program if you have:
 - 7.2.1. A history of late payments
 - 7.2.2. Broken payment plans
 - 7.2.3. Requested payment extensions
 - 7.2.4. Received a disconnection warning notice
 - 7.2.5. Been disconnected for non-payment
- 7.3. We can also support you to join our hardship program if you tell us:
 - 7.3.1. You are eligible for a relief grant or other emergency assistance
 - 7.3.2. You have personal circumstances where hardship support may help. For example, death in the family or job loss
- 7.4. You may have trouble paying your bills for different reasons. Please contact us so we can discuss your individual situation.
- 7.5. Our staff are specially trained to help you with hardship. Staff will:
 - 7.5.1. Ask you a few questions about your circumstances
 - 7.5.2. Work out if you can join the hardship program.
- 7.6. We will assess your application for hardship assistance within 5 business days after contacting us.
- 7.7. We will let you know if you are accepted into our hardship program within 10 business days from receipt of the application.
- 7.8. If you are accepted into our hardship program, we will:
 - 7.8.1. Tell you if you are on the right energy plan or if there is a better plan for you
 - 7.8.2. Tell you about government concessions, relief schemes or energy rebates you may be able to receive
 - 7.8.3. Give you ideas about how to reduce your energy use

- 7.8.4. Talk to you about a payment amount that suits your circumstances
- 7.9. We can send you a free copy of our Hardship Policy.
- 7.10. Your free copy of our Hardship Policy will be sent to you via your preferred form of written communication.

8. Payment Options

What we will do

- 8.1. There are different payment options available to hardship customers, including:
 - 8.1.1. Payment plans
 - 8.1.2. Centrepay
- 8.2. When you are in our hardship program, we will offer you flexible payment options to suit your individual situation.
- 8.3. To make your payment plan, we will consider:
 - 8.3.1. How much you can pay
 - 8.3.2. How much you owe
 - 8.3.3. How much energy we expect you will use in the next 12 months.This will help us figure out a payment plan that is right for you.
- 8.4. We will offer a payment plan to suit your situation. This will include payments to cover:
 - 8.4.1. What you owe
 - 8.4.2. An amount to cover your energy use.
- 8.5. Once we agree to a payment plan, we will send you information including:
 - 8.5.1. Who you can contact for more help
 - 8.5.2. How long the payment plan will go for
 - 8.5.3. The amount you will pay each time
 - 8.5.4. How many payments you need to make
 - 8.5.5. When you need to make your payments (this is also called the frequency of the payments)
 - 8.5.6. How we worked out your payments
- 8.6. You can choose to use Centrepay, if you are eligible.
- 8.7. Centrepay is a free service you can use to help pay your bills. Centrepay can automatically take an amount of money from your Centrelink payments to go toward energy bills and expenses.
- 8.8. We will see if another energy plan may be better for you. If you agree, we can transfer you to a better energy plan for free.
- 8.9. Depending on the rules in our Hardship Policy, we may be able to remove some debt, fees or charges you owe. If you miss a payment, we will contact you to see if you need help. We will contact you by your preferred form of communication.

- 8.10. If this contact fails, Euroka Energy will try again within 2 business days. If you fail to respond on our second attempt, we will make a third attempt 2 business days later. If contact is made, we can look to adjust the plan as above.

What you must do

- 8.11. Tell us if your situation changes and you can no longer make the payments in your plan. We can then review your payment arrangements.
- 8.12. Tell us if your contact details change.
- 8.13. We may stop helping you if you:
 - 8.13.1. Stop making payments under your plan
 - 8.13.2. Do not tell us when your contact details change.
- 8.14. If you have had two payment plans cancelled in the last 12 months because you did not follow your plan:
 - 8.14.1. We do not have to offer you another plan
 - 8.14.2. We might disconnect your energy.

9. Payment plans

- 9.1. To assist you to successfully complete our hardship program, we will offer you flexible payment options to suit your individual situation. We have adopted the Australian Energy Retailers 'Sustainable Payment Plans Framework' to assist us with assessing your capacity to pay.
- 9.2. To make your payment plan, we will consider:
 - 9.2.1. How much you can pay
 - 9.2.2. How much you owe
 - 9.2.3. How much energy we expect you will use in the next 12 months.This will help us figure out a payment plan that is right for you.
- 9.3. We will offer a payment plan to suit your situation. This will include payments to cover:
 - 9.3.1. What you owe
 - 9.3.2. An amount to cover your energy use.
- 9.4. As part of our assessment we will consider whether debt waivers or payment matching are appropriate.
- 9.5. Once we agree to a payment plan, we will send you information including:
 - 9.5.1. Who you can contact for more help
 - 9.5.2. How long the payment plan will go for
 - 9.5.3. The amount you will pay each time
 - 9.5.4. How many payments you need to make
 - 9.5.5. When you need to make your payments (this is also called the frequency of the payments)
 - 9.5.6. How we worked out your payments

10. Successful Completion

- 10.1. If you have successfully completed a payment plan or have been able to meet all outstanding payment obligations to Euroka Energy, you can request to be removed from the hardship program at any time.
- 10.2. Once confirmed, we will contact you confirming successful completion of the payment plan. You will then be returned to Euroka Energy's normal billing cycle.

Steps we will take

- 10.3. We will take the following steps to help you complete our Hardship Program:
 - 10.3.1. Adhere to our Hardship Commitments;
 - 10.3.2. Provide you with the supports outlined in the policy; and
 - 10.3.3. Communicate with you regularly.

Changing a Payment Plan

- 10.4. Either at your request, or as a result of our quarterly reviews, payment plans can be modified. It is important for you to stay in contact with us, should your circumstances change so we can agree to any plan revisions.

Leaving a Payment Plan

- 10.5. You can return to normal billing and collection processes if you complete the payment plan or pay any previous bill arrears.
- 10.6. If you stop meeting your instalment payments Euroka Energy will attempt to contact you by your preferred method to discuss whether there needs to be changes made to the original payment plan. We can reassess the original payment plan and make changes to help restore payments.
- 10.7. If this contact fails, Euroka Energy will try again within 2 business days. If you fail to respond on our second attempt, we will make a third attempt 2 business days later. If contact is made, we can look to adjust the plan as above.
- 10.8. It is important that you actively participate with our hardship program. If you refuse to engage with us after these repeated attempts to make contact, we will remove you from our hardship program.
- 10.9. You may leave the hardship program by transferring to another retailer.
- 10.10. If, as a participant in the hardship program, you fail to make payments as per the agreed payment plan and refuse to engage with us, or if you transfer to another retailer, you will default back to our usual debt collections process.
- 10.11. Disconnection and debt collection are Euroka Energy's absolute last resort.

11. Other Supports to help you Pay your Energy Bill

- 11.1. Depending on the state or territory you live in, there are other supports to help you pay your energy bills.

What we will do

- 11.2. We will tell you about other ways you can get help to pay your energy bill, such as:
 - 11.2.1. Government relief schemes

- 11.2.2. Energy rebates
- 11.2.3. Concession programs
- 11.2.4. Financial counselling programs

What we need you to do

- 11.3. If you find out you are eligible for these programs, let us know as soon as possible so we can help you.

12. Information about government concessions and rebates

- 12.1. There are a variety of Government concession and rebate schemes that can assist low income, vulnerable or medically dependent customers. For customers in hardship, we can help customers identify concessions or rebates they may be eligible for and help with applications to the appropriate authorities. In some circumstances we can check the CCES (Centrelink Confirmation e-services) to determine a customer's eligibility for some concessions.
- 12.2. If we become aware that you may be entitled to a concession or rebate or any other form of assistance, we will notify you by email or phone. Further information on relevant assistance programs can be found by visiting the following websites:
 - 12.2.1. New South Wales, visit www.energy.nsw.gov.au/energy-consumers/financial-assistance
 - 12.2.2. Queensland, visit www.communities.qld.gov.au or call 13 74 68
 - 12.2.3. South Australia, visit www.dcsi.sa.gov.au or call 1800 307 758
 - 12.2.4. ACT, visit www.acat.act.gov.au

13. Information about financial counselling and advice

- 13.1. We encourage those customers within our Hardship Program to speak to accredited financial counsellors. This is a free service whereby the financial counsellor works with you to help you take control of your finances. To find a financial counsellor in your area, please phone 1800 007 007 or visit <http://www.financialcounsellingaustralia.org.au>.
- 13.2. Further, the National Debt Helpline is a not for profit service that helps people tackle their debt problems and offer free, independent and confidential advice. Visit <http://www.ndh.org.au/>

14. Further information about Centrepay

- 14.1. You may request that we accept payment using Centrepay as a payment option.
- 14.2. If you are on a standard retail contract, we must accept Centrepay as a payment option.

- 14.3. If you are on a market retail contract, and if Centrepay is available as a payment option, we must allow you to use Centrepay as a payment option.
- 14.4. If you are on a market retail contract and Centrepay is not available as a payment option, we must review the market retail contract.
- 14.5. If as a result of the review an alternative contract that allows Centrepay as a payment option is considered to be more appropriate, we must transfer you to that contract where you give us your explicit informed consent to do so.
- 14.6. If as a result of the review, there is no appropriate alternative contract that allows Centrepay as a payment option, we must make Centrepay available as a payment option under your existing contract.
- 14.7. We won't charge you for the review, for switching contracts, or for ending your old contract early.
- 14.8. Further information can be obtained from Centrelink by phoning 1800 050 004 or visiting <http://www.humanservices.gov.au/customer/services/centrelink/centrepay>

15. Our Program and Services

- 15.1. As a hardship customer, you can access a range of programs and services to help you, including:
 - 15.1.1. Flexible payment options;
 - 15.1.2. Review of your tariff to determine if another one of our tariffs would be more appropriate;
 - 15.1.3. Information about your energy use;
 - 15.1.4. Advice on how you can reduce your energy use;
 - 15.1.5. Advice on concessions and other assistance that may be available to you.

What we will do

- 15.2. We will consider your individual situation to find the right programs (e.g. concession programs) or services that meet your needs.

16. We want to Check you have the right Energy plan

What we will do

- 16.1. When you join our hardship program, we will talk to you about your energy use and whether you are on the right plan. If we think there is a better energy plan for you, we will:
 - 16.1.1. Explain why the plan is better
 - 16.1.2. Ask if you'd like to transfer to the new plan for free
- 16.2. WE will only talk to you about energy plans we can offer.

17. We will work with you

- 17.1. If you have joined our hardship program, we will not:
 - 17.1.1. Charge late payment fees
 - 17.1.2. Require a security deposit
 - 17.1.3. Make changes to your plan without your agreement. For example, we will not put you on a shortened collection cycle unless you agree first.

18. We can help you Save Energy

- 18.1. Using less energy can save you money:
 - What we will do**
- 18.2. When you join our hardship program, we can give you tips to use less energy. This can be different depending on the state or territory you live in.
 - Energy Efficiency**
- 18.3. Most customers are unaware of simple things they can do around their home which can reduce energy consumption, thus saving them money.
- 18.4. These websites offer some good advice on energy savings tips to help you understand how your household appliances and energy usage affect your energy bills:
 - 18.4.1. <http://yourenergysavings.gov.au>
 - 18.4.2. <http://www.energyrating.gov.au>
 - 18.4.3. <https://www.choice.com.au>
 - 18.4.4. <https://www.moneysmart.gov.au>
 - Energy Audits**
- 18.5. Please give us a call or email us to find out if you may be eligible for an in-home energy audit. We will conduct an initial assessment to determine whether you would benefit from an in-home energy audit, and if so, we can help organise one for you. After our initial assessment we will provide a quote for the in-home energy audit and we will explain whether we will fully or partially cover the cost of the in-home energy audit. We may offer such an in-home energy audit free of charge, for example, if there is high unexplained electricity consumption within your household and your debt level is high.
- 18.6. You are not required to agree to an in-home energy audit to be accepted into our hardship program.

19. Communicating our Hardship Policy

- 19.1. We recognise the need to ensure that we communicate effectively with customers with different needs including:
 - 19.1.1. customers with low English literacy, including customers from culturally and linguistically diverse backgrounds

- 19.1.2. customers without internet access
- 19.1.3. customers with disability, and
- 19.1.4. customers in remote areas
- 19.2. We will ensure that our customers have support with respect to communicating about the Hardship Policy and Hardship Program including:
 - 19.2.1. Referral to language services where available or appropriate;
 - 19.2.2. Communicating via phone or post in accordance with the customer's preferred method of communication;
 - 19.2.3. Ensuring that customers aren't disadvantaged by delays in communication;
and
 - 19.2.4. Referral to services that support customers with disabilities.
- 19.3. If you are in our hardship program or are looking to enter the program, and live in a regional area or do not have access to the internet, we can, upon request, provide all relevant material by post for free, making sure that postage delays do not disadvantage you.
- 19.4. If you have not indicated a preference for how you wish to receive written communication, we will send you the Hardship Policy to you via post.
- 19.5. We will provide bills and documentation in large print where this would be helpful to you.
- 19.6. If you need an interpreter, please call the Translating and Interpreting Service (TIS National) on 131 450.
- 19.7. If you are deaf or have a hearing or speech impairment, please call the National Relay Service on 133 677.
- 19.8. If you have any difficulty accessing these services, our staff can help you to do so.

20. Contact us

- 20.1. If you find you are struggling to meet your payment obligations or wish to discuss forms of assistance that may be available to you with a member of our staff that is specifically trained to assist you with any payment difficulties, please contact us as soon as possible by:
 - Email: {Company_Email} or
 - Phone: {Company_Phone}
- 20.2. If you need an interpreter, please call the Translating and Interpreting Service (TIS National) on 131 450.
- 20.3. If you are deaf or have a hearing or speech impairment, please call the National Relay Service on 133 677.

21. Complaints

- 21.1. Euroka Energy will work with you to resolve any complaints you may have. If you have a complaint, you can contact us by email {Company_Email} or post at {Company_Address}. You can also call {Company_Phone} to leave a complaint.
- 21.2. Once a complaint has been received, a representative from Euroka Energy will immediately acknowledge the complaint and prioritise it for resolution.
- 21.3. Complaints about this Policy or the Hardship Program will be given high priority and we will try to respond as soon as possible.
- 21.4. In all instances, Euroka Energy will:
 - 21.4.1. Freely accept complaints lodged on our website, in person, by telephone, facsimile, email or letter;
 - 21.4.2. Acknowledge any complaint received as soon as possible;
 - 21.4.3. Begin an investigation into the reasons for a complaint within 24 hours of acknowledgment;
 - 21.4.4. Keep the complainant updated about the investigation and any proposed resolution;
 - 21.4.5. Notify the complainant as soon as possible of the outcome of our investigation and any proposal we have for resolution; and
 - 21.4.6. Provide the complainant with the option of an internal review of their complaint if they are unsatisfied with the outcome of the investigation or the proposed resolution.
- 21.5. As per our Standard Complaints and Dispute Resolution Procedures, if you are not satisfied with our proposed resolution, you can escalate your complaint within the business. If you are unhappy with the outcome or at any other time, you can submit your complaint to the Energy and Water Ombudsman in your state. The ombudsman schemes offer a free complaint resolution service to customers and can be contacted in the following ways:

Queensland

Energy and Water Ombudsman Queensland (EWOQ)

Telephone: 1800 662 837

Website: www.ewoq.com.au

New South Wales

Energy and Water Ombudsman NSW (EWON)

Telephone: 1800 246 545

Website: www.ewon.com.au

Australian capital Territory

ACT Civil and Administrative Tribunal (ACAT)

Telephone: 02 6207 1740
Website: www.acat.act.gov.au

South Australia
Energy and Water Ombudsman SA (EWOSA)
Telephone: 1800 665 585
Website: www.ewosa.com.au

22. Training

- 22.1. Our staff (employees, independent contractors, sub-contractors, and agents including call centre and marketing personnel) will receive regular face to face and online webinar training on:
- 22.1.1. answering customer queries about the customer hardship policy and hardship program, and
 - 22.1.2. identifying customers experiencing payment difficulties due to hardship, and
 - 22.1.3. assisting customers experiencing payment difficulties due to hardship
- 22.2. Our training programs will be reviewed and refreshed on a regular basis. Whenever the Hardship Policy or training materials are updated, staff will receive refresher training to ensure that their knowledge is up to date.
- 22.3. Staff will attend meetings and training provided by financial counsellors and community organisations to assist in understanding the issues that may be faced by customers.
- 22.4. A record of training will be kept for all staff.
- 22.5. Training content and materials are subject to regular reviews and updates.

23. Privacy

- 23.1. Euroka Energy is committed to respecting the privacy and protecting the personal information of our customers in accordance with the Privacy Act 1988 (Cth) and Australian Privacy Principles.

24. Review of the policy

- 24.1. This policy will be reviewed at least annually.

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	CJ on 23/01/2020

Version 2	Amendments in accordance with Hardship Policy Guideline	AS on 30/01/2020
Version 3	Updated to 2022	MKG on 02/09/2022
Version 4	Updated to 2023	JD on 26/10/2023
Version 5	Approved Euroka Energy	MM on 13/11/2023



Privacy Policy

Euroka Energy Pty Ltd Privacy Policy

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	Compliance Quarter on 25/05/2022
Version 2	Final	Euroka Energy on 06/11/2023

Next Steps

Step	To be completed by
Client to review document	Euroka Energy Pty Ltd
Compliance Quarter to update based on client feedback	Compliance Quarter
Final approval by client	Euroka Energy Pty Ltd

1. GENERAL

- 1.1. Euroka Energy Pty Ltd (67 658 935 105) ("us or we") respect the privacy of visitors to our websites ('**Sites**'), our customers and other individuals who interact with us.
- 1.2. We have created this privacy policy to explain how we collect, store, use and disclose personal information.
- 1.3. Access to our privacy policy is free. If you would like us to post you a copy of our privacy policy, or have any questions about it or its contents, please call us on **[INSERT PHONE]**.

- 1.4. The *Privacy Act 1988* (Cth) ('**Privacy Act**') includes thirteen (13) Australian Privacy Principles ('**APPs**'). The APPs regulate the way many companies collect, use, hold and disclose personal information.
- 1.5. We have adopted an approach that is consistent with the Privacy Act, the APP's and the APP guidelines.
- 1.6. Our practices and internal policies are consistent with this privacy policy and our staff are required to ensure compliance as a condition of their employment. In any third-party contracts we enter into, there is a duty to maintain personal information in accordance with this privacy policy and in a manner consistent with the Privacy Act.
- 1.7. From time to time we will update this privacy policy. If we do so we will update the version number. Any changes to this privacy policy will be consistent with our legal obligations.

2. HOW AND WHY WE COLLECT PERSONAL INFORMATION

- 2.1. The Company collects personal information in a number of ways. The most common ways we collect personal information include:
 - 2.1.1. **From application forms (online or hard copy or completed via telephone):** when individuals apply to become members of clubs run by us, or subscribe to marketing or communications lists, for the purpose of providing news, information, offers and other services in accordance with terms and conditions of the club or list.
 - 2.1.2. **From order forms (online or hard copy or via telephone):** when goods and services are ordered by distributors and retailers: for the purpose of fulfilling the order and delivering the goods, and to maintain our relationship with the individual concerned.
 - 2.1.3. **From telephone, email, written and in-person enquires:** for the purposes of responding to enquires.
 - 2.1.4. **Business cards:** when you enter into transactions with us or otherwise interact with us in a business context including from your business card.
 - 2.1.5. **From online or hard copy surveys:** for the purpose of reviewing and analysing the results and following up on results.
 - 2.1.6. **Any messages or comments submitted to us via the Site:** which may include personal information such as your name, email address and telephone number.

- 2.1.7. **From public registers including social networks such as LinkedIn:** if you have made this information available, for the purpose of obtaining your contact details.
- 2.1.8. **From Sites through automatic processes such as cookies:** Cookies are used to better understand users and improve the layout and functionality of our Sites by collecting information such as date, time and duration of visits and which pages are most commonly accessed. This tracking is conducted in such a way as to ensure the anonymity of visitors to Sites. While cookies may identify the computer, it should not identify the individual. With most internet browsers, users can erase cookies from their computer's hard drive, block all cookies or receive a warning before a cookie is stored. However, some parts of this Site may not function fully for users that disallow cookies.
- 2.2. Our Sites may collect other information that may or may not be personal information. For each visitor to the Site, our server automatically recognises and stores the individual's "IP address" (eg. the domain name or Internet Protocol address), the type of Internet browser being used, the address of the site that "referred" the individual to our website and clickstream data. If this information cannot be used or combined with other data to identify you, it will not be personal information.
- 2.3. We generally collect personal information for the purpose of providing you with any goods or services that you request, to update our Sites, to improve the services or goods that we provide and to develop our business.

3. WHAT PERSONAL INFORMATION IS COLLECTED?

- 3.1. We aim to only collect personal information that is necessary to fulfil the purpose for which you have disclosed it, or as required by law.
- 3.2. You will typically be asked to provide contact information (such as your name, telephone number, postal address and email address). You may also be asked for demographic information (such as your age and gender) and/or profile data.
- 3.3. In some instances, we may need to ask you for additional information necessary to provide you with the goods or services you have requested. When we ask you for further information in addition to what you provide to us initially, we will tell you why we are collecting that information.
- 3.4. We aim to only collect information that is absolutely necessary to provide you with any service you have requested. If you would prefer to remain anonymous, we are happy to still deal with you,

provided that we don't need to know who you are. Instances where this may be possible include where you are providing us with anonymous feedback that does not require a response.

3.5. We do not collect sensitive personal information.

4. ELECTRONIC COMMUNICATIONS

4.1. In some instances, where you have provided consent, or consent is deemed to have been provided or conferred (in compliance with the APPs) we may use your personal information for the purpose of sending you marketing communications including by electronic means such as email, SMS, MMS for an unlimited period. You may opt-out of receiving such messages at any time provided such messages are sent by us. We will give you the opportunity to opt-out within the message that we send to you. You may also opt-out by contacting us (using the details provided below).

4.2. In some instances, where you have provided consent, or consent is deemed to have been provided or conferred (in compliance with the APPs) we may also send you electronic updates including via email, SMS, MMS for an unlimited relating to products or services you have ordered, used or enquired about, to keep you informed of changes to the Site, and the products or services offered via the Site or from other production companies. You may opt-out of receiving such messages at any time provided such messages are sent by us. We will give you the opportunity to opt-out within the message that we send to you. You may also opt-out by contacting us (using the details provided below).

5. STORAGE OF PERSONAL INFORMATION

5.1. Any information we collect about you will be kept securely by us unless an event beyond our control disrupts the measures we have in place. We use a range of measures to ensure the security of the data we keep and to prevent unauthorised access, destruction, use, modification or disclosure. We have procedures in place with regards to staff access to personal information and ensure that only those staff who need to know have access to your information.

5.2. We will only store personal information for so long as it is required either to fulfil the purpose for which it was collected or to fulfil our obligations at law. We will conduct regular reviews of the personal information we hold and destroy or de-identify information no longer required.

6. DISCLOSURE OF PERSONAL INFORMATION

- 6.1. Generally, personal information will not be disclosed to individuals or organisations outside of Euroka Energy Pty Ltd without your prior consent. However, in the circumstances described below, personal information may be disclosed to:
- 6.1.1. **Essential service providers:** There may be other companies that we rely on to provide goods or services to you. We may be required to provide your personal information to these companies to ensure that we can deliver goods or services to you.
 - 6.1.2. **Law enforcement or government bodies:** There are exceptions under the Privacy Act with regards to the provision of personal information to law enforcement or government bodies. When a legitimate request is sent to us by a law enforcement or government body we will comply with that request and may provide personal information about you without your consent.
 - 6.1.3. **Companies related to us or who take control of part or all of our business:** In providing personal information to us you will need to be aware of the possibility that, in future, another company may take control of part or all of our business. In that case, your personal information will be provided to that company.
- 6.2. If we disclose personal information to a third party under outsourcing or contracting arrangements (a service provider), we will take steps to ensure that they have:
- 6.2.1. Signed a binding agreement;
 - 6.2.2. Handle the personal information in a manner consistent with the APPs (regardless of whether they are a small business, or would otherwise be exempt from the Privacy Act);
 - 6.2.3. Only use the personal information in order to provide specific services or to perform the specific functions required; and
 - 6.2.4. Store the personal information securely, and only for as long as is necessary to provide the required services to perform the required functions.

7. ACCESS TO PERSONAL INFORMATION

- 7.1. Under the Privacy Act, you have the right to seek access and to update or correct the personal information that we hold about you. If you wish to exercise your right under the Privacy Act to seek access to the personal information held for you, you should make the request in writing (to the address specified below).

- 7.2. Ordinarily we will not charge for providing access/copies of personal information we hold about you, and will generally respond to access requests of this type within 30 days. If we anticipate there being a fee (for the time we spend locating and compiling the information you have asked for) we will provide you with an estimate before proceeding. If a fee is payable it will be based on an hourly rate plus the cost of photocopying or other out of pocket expenses. For legal and administrative reasons, we may also store records containing personal information in archives. Access to these historical records may result in a charge being incurred (an estimate will be provided to you prior). Due to the nature of archive, requests for access to historical records may take longer to process than with current records.
- 7.3. You may correct the personal information we hold about you at any time, you should make the request in writing (to the address specified below). We do not charge a fee to correct personal information held.
- 7.4. On review of your request, if we agree that the personal information held is not accurate, complete and up to date, it will be corrected by the appropriate person. If we do not agree, you will be provided with the reason(s) for the views and the opportunity to make a statement of your view and have it included with the information held.

8. COMPLAINTS

- 8.1. You have a right to complain to us if you are concerned about your privacy, how we have dealt with your personal information or in relation to the Privacy Act.
- 8.2. If you are concerned about how we have dealt with your personal information you should first contact us (using the details set out below). We will endeavour to send you a written response within 10 business days.
- 8.3. If you are not satisfied with the way we have managed or attempted to resolve your complaint you may complain to the Office of the Australian Information Commissioner by calling them on 1300 363 992, via their website at www.oaic.gov.au or by mail to the Office of the Australian Information Commissioner, GPO Box 5218 Sydney NSW 2001.

9. LINKS TO THIRD-PARTY WEBSITES

- 9.1. Our Sites contain links to third party websites for individual's convenience and information. Individuals should be aware that when they access a third-party website, we are not responsible for the privacy practices or policies of that third party and will not be liable for any use or disclosure your personal information by any third party to whom your information is sent. We suggest that you review the privacy policy of each website you visit.

10. ACCEPTANCE OF THESE TERMS

- 10.1. By using the Sites, you signify your acceptance of this privacy policy. If you do not agree with this policy, please do not use our Sites or provide us with your personal information. The Euroka Energy Pty Ltd reserves the right to modify, alter or otherwise update this policy at any time. Should the Euroka Energy Pty Ltd modify, alter or otherwise update this policy, it will prominently post notice(s) of the changes on the Sites covered by this privacy policy.

11. CONTACT DETAILS [Please ensure that you are happy to use the following contact details].

Company Name: Euroka Energy Pty Ltd
Telephone: 02 4044 5067
Email: info@eurokaenergy.au
Mailing address: Level 1, 2/17 Edgar Street Belmont NSW 2281.



Statement for the Euroka Energy Website

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	Compliance Quarter on 25/05/2022
Version 2	Final Draft	Compliance Quarter on 05/11/2023
Version 2	Final	Euroka Energy on 06/11/2023

Next Steps

Step	To be completed by
Client to review document	Euroka Energy Pty Ltd
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Final approval by client	Euroka Energy Pty Ltd

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Introduction

The following statements must be published on the retailer's website. Each must be a separate statement and link to relevant policy documents.

Glossary:

NERL - National Energy Retail Law

NERR – National Energy Retail Rules

i.e this could be in the following form:

Important customer information >

- **Summary of the rights, entitlements and obligations of small customers**
 - **Hardship Program**
 - **Life support equipment**
 - **No contact list**
 - **Complaints Policy**
 - **Compliance Policy**
-

Customers who are experiencing hardship

NERL s59 and NERR s139, NERR s124

There are a range of reasons why a residential customer may have the intention but not capacity to pay for an electricity invoice. Euroka Energy Pty Ltd is committed to the early identification and provision of assistance to residential customers who are experiencing hardship.

We have a Hardship Policy which sets out how we identify and manage accounts of residential customers who are experiencing hardship. At all times we endeavour to treat customers fairly and with empathy and respect.

To be eligible to enter the Hardship Program you must meet the following three criteria:

- Have a current residential customer account with us;
- Be experiencing short term or long term hardship; and
- Demonstrate a willingness to pay any debt you have with us.

Even if you have no arrears on your account, you can participate in our Hardship Program.

Some of the key benefits of our Hardship Program are:

- It is free to join;
- Free energy efficiency advice;

- No late payment fees or early termination fees (on leaving the program);
- We accept payment plans and a variety of payment methods;
- We will refer customers to appropriate services such as financial counsellors where appropriate; and
- We will provide assistance with government funded concessions, rebates and grants.

Please contact us to obtain further information on our Hardship Program and the options available to you.

Our contact details:

Suite 2, Level 1, 2/17 Edgar Street Belmont NSW 2281

02 4044 5067

info@euroka.energy

Customers who require life support

NERL s59 and NERR s139, NERR s124

If you are a customer and have not provided us with information relating to your need for life support, this notice tells you how you can let us know and what we will do with your account.

Notify us

You must notify us as soon as possible if you, or anyone living with you, needs life support. You can notify us using the contact details below. Once you have notified us we will note this on your account and ensure that your account is not disconnected.

Information we will require and what we will do

You will then be required to provide us with confirmation from a registered medical practitioner of your (or any other person residing with you) need for life support equipment. We will then immediately notify the energy distributor of the need for life support equipment at your premises, giving them the information they need to update their records and registers. We will also provide you with verbal and written confirmation and an emergency contact number for your distributor (the charge for which is no more than the cost of a local call).

Cessation of requirement for life support equipment

If you or any other person residing with you no longer have a requirement for life support equipment or you have vacated a premises and moved away, you must notify us as soon as possible. We will then notify the energy distributor who will update their records and registers.

Please contact us using the details below if you or any other person at your premises requires life support equipment, if you have any questions or would like to lodge a complaint.

Our contact details:

Suite 2, Level 1, 2/17 Edgar Street Belmont NSW 2281

02 4044 5067

info@euroka.energy

No Contact List

NRR Pt2 Div10

This notice is to confirm your rights under Australian Energy Law. We have a range of obligations to you under Energy Law, The *Telecommunications Act 1997*, the *Do Not Call Register Act 2006* and the Australian Consumer Law set out in Schedule 2 to the *Competition and Consumer Act 2010*.

We operate and maintain a 'No Contact List' and the purpose of the list is to ensure that we do not market to those who do not wish to be marketed to.

You can let us know that you would like to be included on the list in person, on our website, by email, electronically, by telephone or in writing.

We will then add your name and address, at no cost to you, to the 'No Contact List' and ensure that our marketing representatives do not make any contact with you for a period of two years. You may renew your request to be added to the 'No Contact List' and we will extend the period for a further two years each time you make this request.

Please contact us using the details below if you would like to be included on the list, have any questions or would like to lodge a complaint.

Our contact details:

Suite 2, Level 1, 2/17 Edgar Street Belmont NSW 2281

02 4044 5067

info@euroka.energy

Summary of the rights, entitlements and obligations of small customers

NRR s 56

See separate document.

Privacy Policy

See separate document.

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	Compliance Quarter on 25/05/2022



Family Violence Policy

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1. Policy Statement

- 1.1. Our organisation recognises that family violence is a serious and widespread issue that affects the whole community.
- 1.2. We are committed to providing customers affected by family violence with confidential support and flexible payment arrangements to help manage their needs.
- 1.3. This policy will be implemented immediately and reviewed at least every 12 months to ensure it remains effective.
- 1.4. We have a number of resources set out in this Policy.

For immediate support, you can contact 1800 RESPECT on 1800 737 732. This is the National Sexual Assault, Domestic Violence Counselling Service 24-hour helpline.

If you require urgent help from the police, fire, or ambulance, call 000.

2. Purpose

- 2.1. Our objective as an energy retailer is to reduce the risk of harm to our customers who are experiencing or who have experienced family violence. We do this by:
 - 2.1.1. Designing our systems and processes in a way that reduces the risk of harm;
 - 2.1.2. Reducing the barriers to customers who are seeking help, assistance or information under this Policy;

- 2.1.3. Adopting the measures set out in this Policy; and
- 2.1.4. Demonstrating our commitment to support customers at all levels within our business, including from senior leadership.
- 2.2. The purpose of this policy is to:
 - 2.2.1. Reduce the risk of harm to our customers experiencing family violence;
 - 2.2.2. Provide safe, flexible and confidential support for customers affected by family violence; and
 - 2.2.3. Demonstrate our commitment to addressing family violence at all levels of our business.

3. Publication and access

- 3.1. We can send you a copy of this policy if you would like us to. We will make sure this policy is easy to find on our website so that you can print it or read it online.
- 3.2. We recognise that there are many forms of family violence. Family violence is any behaviour that occurs in family, domestic or intimate relationships that is physically or sexually abusive; emotionally or psychologically abusive; economically abusive; threatening or coercive; or is in any other way controlling, that causes a person to live in fear for their safety or wellbeing or that of another person. Family violence is also defined as behaviour by any person that causes a child to hear or witness or otherwise be exposed to the effects of the above behaviour.

4. Scope

- 4.1. This policy applies to all current and former residential and small business customers who are impacted by family violence.

5. Your Rights

Our customers who are impacted by family violence have the following rights:

- 5.1. Receive support from our employees in a respectful and supportive manner.
- 5.2. Have your personal information handled securely, privately, and sensitively.
- 5.3. Choose a method of communication of your preference. We offer a variety of communication channels, such as email, phone, and secure messaging, to suit different needs and comfort levels.
- 5.4. Access information about external family violence support services. We will maintain an updated list of external family violence support services and make it easily accessible through various platforms.
- 5.5. Appoint an authorised representative or a support person to act on your behalf. We will implement a secure verification process for authorised representatives to ensure they are legitimate.

- 5.6. Remove the joint account holders and, if needed, set up a new account in your name (if required). We will implement a simplified, expedited process for removing joint account holders and setting up new accounts.
- 5.7. Receive payment assistance support, including access to the assistance under our hardship policy. We won't charge you anything to change details on your account.
- 5.8. Avoid the need to repeatedly disclose your circumstances and receive continuity of service. If you are comfortable with us doing so, we will assign you a dedicated contact and backup contact within our organisation. You can request a change to who your contacts are at any time.
- 5.9. Account security options: we will implement additional account security measures as set out below. These are designed to keep your account safe.

6. What we will do

- 6.1. We will implement a robust and meaningful intersectional approach to our customer relationships which will include induction training, workplace resources, refresher training, and collecting client and staff feedback with the aim of continually improving.
 - 6.1.1. Ongoing training is provided to every person (including employees, agents and contractors) acting on our behalf who may engage with affected customers, managers of any person who may engage with affected customers and also anyone responsible for systems and processes that guide interactions with small customers.
 - 6.1.2. The purpose of the training we provide is to ensure that we comply with this policy and our obligations under relevant law and to ensure that our customers are adequately supported and protected.
 - 6.1.3. Training will cover the nature and consequences of family violence, the application of this policy, how to identify affected customers using the 'Recognise, Respond, Refer' model and how to engage appropriately and effectively with affected customers.
- 6.2. We have systems and controls in place to effectively identify customers experiencing family violence and also internal processes to avoid an affected customer from having to repeat their situation during subsequent interactions providing for effective ongoing engagement.
- 6.3. We will manage all engagement with affected customers in a respectful, understanding, and sensitive manner.
- 6.4. We will handle information pertaining to customers affected by family violence securely and confidentially.
- 6.5. We will ensure that customer consent is obtained before disclosing their personal information to a third party (unless required under law).
- 6.6. We will contact emergency services (police and/or ambulance) on request by the customer or if they believe further assistance is needed.

- 6.7. We will take your specific circumstances into account and discuss a safety plan with customers who have disclosed family violence to confirm and ensure the safety of the customer and their children
- 6.8. We will provide information regarding government support programs, including concessions and the availability of external family violence support services (see below)

7. How we secure your account

- 7.1. Our organisation takes our obligations regarding all of our customer's personal information seriously and we manage this in accordance with the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles*. A copy of our privacy policy is available [<here>](#).
- 7.2. We take various steps to secure your data including:
 - a. Restricting access to your accounts,
 - b. customer defined account security,
 - c. data masking and redaction, and
 - d. de-identifying correspondence.
- 7.3. These measures are applied based on your preferences or our assessment of your needs.
- 7.4. Your personal information will be securely handled and will remain confidential. We will not disclose your confidential information to any other person without your prior consent or where we are required to do so by law.
- 7.5. Our organisation will maintain records relating to our compliance with our obligations under the law relating to retailers and family violence. These records will be maintained for at least two years, for as long as you continue to receive assistance from us, or as long as there are any unresolved disputes.

8. What we will do about debts

- 8.1. Our organisation recognises family violence as a potential cause of financial hardship or payment difficulty. Before taking action to recover arrears from an affected customer or transferring affected customer debt to a third party debt collector, we will consider each customer's individual circumstances and take into account the potential impact of debt recovery action at that time on the affected customer. We will aim to find a suitable solution specific to the customer's needs and offer support in accordance with our hardship policy [<link to the policy>](#). This will include whether other persons are jointly or severally responsible for the energy usage that may have resulted in the accumulation of any arrears. Prior to arranging for disconnection of electricity to your premises we will ensure that we take into account the potential impact on you considering your circumstances and any other parties that may be involved in the non-payment of any debt.
- 8.2. We will not ask for a security deposit from any customer who has or is experiencing family violence and we will waive late fees associated with late payment of a bill
- 8.3. Regardless of whether or not you are in hardship, the support that we offer may include:

- a. Flexible payment arrangements.
- b. Reviewing your energy plan and placing you on a more suitable plan.
- c. Waiving or suspending the debt.
- d. stopping the collections cycle to ensure that your premise is not de-energized for an overdue bill.

9. Centrepay

- 9.1. You may request that we accept payment using Centrepay as a payment option.
- 9.2. If you are on a standard retail contract, we must accept Centrepay as a payment option.
- 9.3. If you are on a market retail contract, and if Centrepay is available as a payment option, we must allow you to use Centrepay as a payment option.
- 9.4. If you are on a market retail contract and Centrepay is not available as a payment option, we must review the market retail contract.
- 9.5. If as a result of the review an alternative contract that allows Centrepay as a payment option is considered to be more appropriate, we must transfer you to that contract where you give us your explicit informed consent to do so.
- 9.6. If as a result of the review, there is no appropriate alternative contract that allows Centrepay as a payment option, we must make Centrepay available as a payment option under your existing contract.
- 9.7. We won't charge you for the review, for switching contracts, or for ending your old contract early.

10. What support is available

- 10.1. You can access support by contacting:
 - a. our customer service department through various channels such as phone, email, or in-person visit.
 - b. an independent financial counsellor, case worker or an external family violence support services to access resources and support.
- 10.2. We will ensure that we ask your preferred method of communication and will communicate with you via this method of communication. If your preferred method of communication is not practicable, you may communicate with us via SMS, WhatsApp, Messenger, Email, or by Phone. We will keep a record of the ways in which we will communicate with you.

11. Supporting Documentation

- 11.1. We will never request you or a third party acting on your behalf to provide specific documentation or evidence before providing you with support under this policy or the Rules.

- 11.2. We will only ask for documented evidence of family violence in limited circumstances and where we are expressly permitted to do so under the law. Any evidence sought will be limited to that which is reasonably required under the relevant law.

12. External Support

- 12.1. We will advise you of external support services, including access to a free interpreter service (telephone <number>).
- 12.2. We will also maintain a list of external support services that are published on our website.
- 12.3. We will keep this information up-to-date, ensuring that customers affected by family violence can easily access this assistance.

13. If you have a complaint, question, or feedback

- 13.1. At any time, if you have concerns about your well-being or need support with your energy account, please do not hesitate to contact us. You can reach us via email at <email address> or by phone at <phone number>.
- 13.2. We take all your concerns and complaints seriously and will handle them in accordance with our Complaints and Dispute Resolution Policy <include link>.
- 13.3. We welcome feedback on this policy. If you have feedback on this policy please do not hesitate to contact us.
- 13.4. If you are not satisfied with the outcome of our investigation, you can also contact the state-specific Ombudsman for further assistance.
- 13.5. See below a list of state specific energy ombudsman contact details.

Ombudsman	Contact no.	Website
Energy and Water Ombudsman (VIC)	1800 500 509	www.ewov.com.au
Energy and Water Ombudsman (SA)	1800 665 565	www.ewosa.com.au
Energy and Water Ombudsman (NSW)	1800 246 545	www.ewon.com.au
Energy and Water Ombudsman (QLD)	1800 662 837	www.ewoq.com.au
Civil and Administrative Tribunal (ACT)	02 6205 4855	www.acat.act.gov.au

14. What external support is available

- 14.1. We will advise you of external support services, including access to a free interpreter service. (see above) We will ensure that this information is provided in a safe, respectful and appropriate manner taking your specific circumstances into consideration.
- 14.2. We will also maintain a list of external support services that are published on our website (see below).
- 14.3. We will keep this information up to date, ensuring that customers affected by family violence can easily access this assistance.

14.4. If you or someone you know is experiencing sexual abuse or family violence contact:

External support services	Contact number
National Sexual Assault, Domestic Violence Counselling Service 24-hour helpline	1800 RESPECT on 1800 737 732
24-hour Emergency Accommodation helpline	1800 800 588
Safe Steps (Victoria)	1800 015 188
Sexual Assault Crisis Line (Victoria)	1800 806 292
Safe At Home helpline	1800 633 937
National Violence and Abuse Trauma Counselling and Recovery Service	1800 FULLSTOP (1800 385 578)
SHE (free and confidential counselling and support)	6278 9090
Sexual Assault Support Services on 6231 1811, or after hours	6231 1817
Family Violence Crisis and Support Service	1800 608 122
Bravehearts – Sexual Assault Support for Children	1800 BRAVE 1
Kids Helpline is for young people aged 5 to 25	1800 551 800
Men's Referral Service	1300 766 491
Don't Become That Man helpline	1300 243 413

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	
Version 2	Final	Euroka Energy 14/11/2023

4th October 2022

Our Ref: 1071-24

Mark Marjoribanks
Euroka Energy Pty Ltd
Suite 2a, L2 240-244 Pacific Highway
CHARLESTOWN NSW 2290

Dear Mark,

Re: Euroka Energy Pty Ltd Compliance and Risk Audit Action Verification

Further to Shared Safety and Risk's independent audit of Euroka Energy Pty Ltd's compliance and risk management systems in September 2022, I can confirm that we have reviewed Euroka Energy's audit response and verified completion of the recommended actions through document review.

As such we can confirm Euroka Energy Pty Ltd's compliance and risk management arrangements meet the planned requirements.

If any further information is required or if you have any queries regarding this information please do not hesitate to contact me on [REDACTED]

Yours sincerely,

[REDACTED]

SUE [REDACTED]
Director #114812
Director



Criterion 1 Declaration - CEO

Criterion 1

I, Mark Marjoribanks of [REDACTED] being the Chief Executive Officer of Euroka Energy Pty Ltd declare that other than as disclosed and set out in Annexure A that Euroka Energy Pty Ltd, Euroka Energy Pty Ltd's associates, any other business where Euroka Energy Pty Ltd's officers have held an officer position and any other entity that exerts control over Euroka Energy Pty Ltd has not had:

- Any material failure to comply with regulatory requirements, laws or other obligations over the previous 10 years, including infringement notices or other enforcement action (including voluntary administrative undertakings) being taken by a regulatory body.
- Any previously revoked authorisations, authorities or licences held in any industry.
- Any failed authorisation, authority, or licence applications in any industry.
- Any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry.
- Any situation where Euroka Energy Pty Ltd or an associate of Euroka Energy Pty Ltd, has previously triggered the RoLR provisions of the Retail Law or equivalent state/territory/foreign legislation, or have transferred or surrendered an authorisation or licence in circumstances where if not done, triggering a RoLR event would have been likely.

Signed



Mark Marjoribanks

Date: 14 November 2023

Annexure A- [REDACTED]

This is Annexure A to a declaration included in Euroka Energy Pty Ltd's application for a retailer authorisation.

I was previously the General Manager of Urth Saver Pty Ltd who was a 100% owned subsidiary of the retailer Urth Energy Pty Ltd who appointed an administrator, had its retailer authorisation revoked, consequently was not compliant with regulatory obligations, and triggered the RoLR provisions of the Retail Law.

The circumstances of this were the Directors of Urth Energy Pty Ltd were the sole source of funding for the entire business and when the market moved against them following the closure of the Northern Coal Fired power station in South Australia, this made a significant jump in Wholesale Energy prices. The traders at Urth Energy had not foreseen this increase in wholesale prices and had entered into a number of below market contracts for the next 3 years which the directors of Urth Energy were not willing to fund.

My involvement in this was that I was responsible for putting together solar projects and solar power purchase agreements. At the time of administrators being appointed, I had successfully put together 16MWs of behind the meter PPAs back to Urth Energy at the rate of \$40 per MWh for 25 years (No CPI). These projects were never installed unfortunately by Urth Saver.

This is a matter that I am disclosing to the Australian Energy Regulator however it is not one that means that Euroka Energy or myself are unfit to hold a retailer authorisation because as I was not a director of Urth Energy or held a management position in Urth Energy, at the time administrators being appointed I had no say in the matter at all. The division that I was responsible for was very successful and was potentially going to provide a very good financial basis for Urth Energy being the ability to purchase energy at the rate of \$40 per MWh for the next 25 years.



Criterion 2 Declaration - CEO

Criteria 2

I, Mark Marjoribanks, of [REDACTED] being the Chief Executive Officer of Euroka Energy Pty Ltd, declare that Euroka Energy Pty Ltd's current director/s (or shadow / de facto director/s), and any other person that exerts control over Euroka Energy Pty Ltd's business activities, the person/s with effective control of the business and all persons who are responsible for significant operating decisions for Euroka Energy Pty Ltd have not committed or been the subject of any offence or successful prosecution under any territory, state, Commonwealth or foreign legislation (including, but not limited to, the *Australian Securities and Investments Commission Act 2001* (Cth), *Competition and Consumer Act 2010* (Cth) and the *Corporations Act 2001* (Cth), relevant to Euroka Energy Pty Ltd's capacity as an energy retailer.

Signed

A handwritten signature in black ink, appearing to read 'M. Marjoribanks', written in a cursive style.

Mark Marjoribanks

Date: 14 November 2023



Criterion 1 Declaration - CFO

Criterion 1

I, Yen-Wen Huang of [REDACTED] being the Chief Financial Officer and Director of Euroka Energy Pty Ltd declare that other than as disclosed and set out in Annexure A that Euroka Energy Pty Ltd, Euroka Energy Pty Ltd's associates, any other business where Euroka Energy Pty Ltd's officers have held an officer position and any other entity that exerts control over Euroka Energy Pty Ltd has not had:

- Any material failure to comply with regulatory requirements, laws or other obligations over the previous 10 years, including infringement notices or other enforcement action (including voluntary administrative undertakings) being taken by a regulatory body.
- Any previously revoked authorisations, authorities or licences held in any industry.
- Any failed authorisation, authority, or licence applications in any industry.
- Any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry.
- Any situation where Euroka Energy Pty Ltd or an associate of Euroka Energy Pty Ltd, has previously triggered the RoLR provisions of the Retail Law or equivalent state/territory/foreign legislation, or have transferred or surrendered an authorisation or licence in circumstances where if not done, triggering a RoLR event would have been likely.

Signed

Yen-Wen Huang

Date: 14 November 2023

Annexure A- [REDACTED]

This is Annexure A to a declaration included in Euroka Energy Pty Ltd's application for a retailer authorisation.

An employee of Euroka Energy, Mr Mark Marjoribanks was previously the General Manager of Urth Saver Pty Ltd who was a 100% owned subsidiary of the retailer Urth Energy Pty Ltd who appointed an administrator, had its retailer authorisation revoked, consequently was not compliant with regulatory obligations, and triggered the RoLR provisions of the Retail Law.

The circumstances of this were the Directors of Urth Energy Pty Ltd were the sole source of funding for the entire business and when the market moved against them following the closure of the Northern Coal Fired power station in South Australia, this made a significant jump in Wholesale Energy prices. The traders at Urth Energy had not foreseen this increase in wholesale prices and had entered into a number of below market contracts for the next 3 years which the directors of Urth Energy were not willing to fund.

Mr Mark Marjoribanks involvement was that he was responsible for putting together solar projects and solar power purchase agreements. At the time of administrators being appointed, Mark Marjoribanks had successfully put together 16MWs of behind the meter PPAs back to Urth Energy at the rate of \$40 per MWh for 25 years (No CPI). These projects were never installed unfortunately by Urth Saver.

This is a matter that I am disclosing to the Australian Energy Regulator however it is not one that means that Euroka Energy unfit to hold a retailer authorisation because Mr Mark Marjoribanks was not a director of Urth Energy or held a management position in Urth Energy, at the time administrators being appointed I had no say in the matter at all. The division that Mr Mark Marjoribanks was responsible for was very successful and was potentially going to provide a very good financial basis for Urth Energy being the ability to purchase energy at the rate of \$40 per MWh for the next 25 years.



Criterion 2 Declaration - CFO

Criteria 2

I, Yen-Wen Huang, of [REDACTED] being the Chief Financial Officer and Director of Euroka Energy Pty Ltd, declare that Euroka Energy Pty Ltd's current director/s (or shadow / de facto director/s), and any other person that exerts control over Euroka Energy Pty Ltd's business activities, the person/s with effective control of the business and all persons who are responsible for significant operating decisions for Euroka Energy Pty Ltd have not committed or been the subject of any offence or successful prosecution under any territory, state, Commonwealth or foreign legislation (including, but not limited to, the *Australian Securities and Investments Commission Act 2001* (Cth), *Competition and Consumer Act 2010* (Cth) and the *Corporations Act 2001* (Cth), relevant to Euroka Energy Pty Ltd's capacity as an energy retailer.

Signed

Yen-Wen Huang

Date: 14 November 2023



Criterion 4 Declaration - CEO

Criteria 4

I, Mark Marjoribanks of [REDACTED], being the Chief Executive Officer of Euroka Energy Pty Ltd, declare that other than as disclosed and set out in Annexure A:

- No member of Euroka Energy Pty Ltd's management team has been disqualified from the management of corporations;
- There is no record of bankruptcy, including in any overseas jurisdiction, of any member of Euroka Energy Pty Ltd's management team.



.....
Mark Marjoribanks

14 November 2023

.....
Date

Annexure A:

This is a [REDACTED] annexure to the declaration made by me Mark Marjoribanks of [REDACTED], being the Chief Executive Officer of Euroka Energy Pty Ltd.

I note that I was bankrupted in 2014. The reasons for this were that I co-created a successful business with Mr Chris Baynes and Mr Arthur Koumekelis in 2009. I owned 40% of the business, Mr Baynes owned 50% and Mr Koumekelis owned 10% of the business.

The business was called DCM Solar Pty Ltd (DCM Solar) and was set up as a special purpose vehicle and meant to operate for approximately 12 months to complete the project it was set up for being the installation of 1kW Solar Systems under the Solar Homes and Communities Program.

The business was very successful and made a profit of approximately \$10million dollars, of which I received dividends of \$1.6m.

Unfortunately, during the time of the business, Mr Baynes and Mr Koumekelis set up another business called DCM Green Pty Ltd plus a web of DCM Green companies (DCM Green), which Mr Baynes and Mr Koumekelis owned 80% and 20% respectively.

Profits were siphoned from DCM Solar to DCM Green without my knowledge as I was not a director of DCM Solar. When I uncovered the misappropriations. I sought legal advice from Collins Bishop Paisley (CBP) law firm in Sydney as to my options. They advised that I should appoint myself as director and place the business into administration due to the fact that all the funds has been dispersed and that the administrators had stronger powers to recover funds.

I followed the advice of CBP and I appointed myself to the board of DCM Solar and placed DCM Solar into administration with administrators BDO Stoy Hayward ward who were recommended by CBP.

Following the placement of DCM Solar into administration, CBP were appointed to act on behalf of BDO and commenced legal proceedings against me recover dividends that had been paid to me. The resulting action caused my bankruptcy in 2014.

I have attached the ASIC Current and Historical Company Extract of DCM Solar and DCM Green, you will note that I appointed myself to the board of DCM Solar in October 2010 and administrators were appointed shortly thereafter. In addition you will note that DCM Green was established after DCM Solar and that I was never a director or shareholder of DCM Green.

This prior bankruptcy is not relevant to the application in so far as the bankruptcy has ended and the circumstances of the bankruptcy were exceptional and not a reflection on my character or the skills and experience that I will bring to my professional contribution to the business.



Criterion 5 - CFO

Criteria 5

I, Yen-Wen Huang of [REDACTED], being Chief Financial Officer and Director of Euroka Energy Pty Ltd declare that Euroka Energy Pty Ltd is a going concern and I am unaware of any factor that would impede Euroka Energy Pty Ltd's ability to finance its energy retail activities under the authorisation for the next 12 months.

.....

Yen-Wen Huang

14/11/2023

.....

Date



JC Accounting Solutions
& Business Advisors

23 January 2024

I, Johnny Chan of 6 Girraween Crescent, Parkinson being an accountant at JC Accounting Solutions Pty Ltd, an independent auditor of Euroka Energy Pty Ltd, declare that:

- An insolvency official has not been appointed in respect of Euroka Energy Pty Ltd or any property of Euroka Energy Pty Ltd.
- No application or order has been made, resolution passed or steps taken to pass a resolution for the winding up or dissolution of Euroka Energy Pty Ltd.
- I am unaware of any other factor that would impede Euroka Energy Pty Ltd's ability to finance its energy retail activities under the authorisation.

Your sincerely

Johnny Chan

Director