



CEP Energy Retail Pty Ltd Authorisation Application (AER)

The energy business
of tomorrow.

Introduction

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

About CEP Energy Retail Pty Ltd

The applicant retail entity CEP.Energy is an Australian proprietary company limited by shares. It is a subsidiary of CEP Energy Pty Ltd (**CEP**), which is a market leading distributed renewable energy and storage platform through exclusive, long-term access to large portfolios of Commercial and Industrial properties.

The CEP's reason for being is captured in its full name – Clean Energy Partnerships. CEP establishes partnerships with Australian commercial, industrial and retail property owners to assist them to drive Australia towards its renewable energy targets and their sustainability goals.

With available capital in the CEP fund, CEP finances, develops and operates an end-to-end energy solution for property owners that drives the sustainability, efficiency, and environmental ratings of their buildings, improves property values and enables them to make renewable energy, generated onsite, available to their tenants.

The CEP's current model is as an exempt seller (**ENO**) and retail purchaser (gate procurement) but seeks to broaden its capabilities by becoming an authorised retailer, to provide short- and long-term benefits to both customers and the CEP business.

The Application

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.

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: organisational 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
- **Part Five** provides Annexures 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 CEP Energy
1	Fuel type Please enter either Electricity (E), Gas (G) or Dual (D)	Electricity (E)
2	Existing or Start-up business	Start-up
3	Confidential documents - Please enter either - Yes or No	Yes
4	Your legal name	CEP Energy Retail Pty Ltd
5	Your trading name if different to your legal name	N/A
6	ABN or ACN	ABN: 30 658 178 404 ACN: 658 178 404
7	A registered business address and address for correspondence	Registered address: 'Collins Square Tower 4' Level 18 727 Collins Street, Docklands VIC 3008 Address for correspondence: Level 1, 274 Victoria Street, Darlinghurst NSW 2010
8	A nominated contact person, including their position in the organisation and contact details	Name: Connor James Position: Consultant Address: Level 2, 19 Brisbane Water Drive, Koolewong NSW 2256 Email: connor@compliancequarter.com.au Mobile: [REDACTED] Website: www.compliancequarter.com.au
9	The date you intend to commence retailing energy	31 March 2025

10	The nature and scope of operations proposed (business model and size of operations, volume of customers)	<p>CEP Energy Retail Pty Ltd will engage in the sale of electricity to large Commercial & Industrial property owners and consumers across NECF jurisdictions. With access through the parent, [REDACTED]</p> <p>[REDACTED] CEP Energy Retail's goal is to provide sustainable energy solutions to large consumers, as new sectors electrify and demand increases.</p> <p>CEP Energy Retail is uniquely positioned to support partnered large commercial and industrial property portfolio owners attract and assist C&I tenants with long term sustainable solutions to help manage their two main costs, electricity, and transportation.</p> <p>The scope and proposed size of the operation is further set out in the attached business plan (Annexure C1) and financial models (Annexure C3-C7).</p>
11	The jurisdictions in which you intend to retail energy	NECF Jurisdictions (NSW, QLD, SA, ACT and Tas)
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)	Small and large commercial and industrial consumers

2. Part Two: Required information – organisational and technical capacity

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

Criterion from Guideline	Required information	Response from CEP.Energy
Criterion 1	Details of your (or any related parties) previous experience as an energy retailer	<p>The Australian owned and operated retail entity CEP.Energy is a new entity without retail experience in itself. However, it is part of a group of related entities with significant experience in the industry, and the individuals and suppliers engaged have significant experience in the energy market.</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.</p> <p>CEP has existing embedded network operations and has developed the experience to transition to the holder of a retail authorisation. In particular, the recent acquisition of embedded network specialists, Energy Intelligence, has strengthened CEP's involvement in this area. Please see the Energy Intelligence Capability Statement (Annexure A10) and Energy intelligence Roadmap (Annexure A11) for further information about their previous experience.</p> <p>Further detail about previous experience of related entities can be found in the Business Plan (Annexure C1).</p> <p>Further detail about experience of individuals and providers, can be found in Key Individuals and Providers (Annexure A4).</p>

1.1	The date and location of previous operations (this should include related entities (if applicable))	<p>Australian owned and operated, the energy retail entity CEP.Energy is a newly established entity without previous experience as an energy retailer, but draws on the experience of its parent group members, and its staff and contractors.</p> <p>Previous operations of related entities can be found in the Business Plan (Annexure C1) and the Energy Intelligence Capability Statement (Annexure A10).</p> <p>CEP Energy Retail's parent includes a diverse and experienced management team that is committed to the success of the retail energy platform:</p> <ul style="list-style-type: none"> • Former Head of Operations at AEMO • Former Deputy CEO of Endeavour Energy • Former Executive Director of Macquarie Bank • Former Director of Energy Intelligence • Former Retail Manager of NSW 777 & 776 Contracts • Former Head of Embedded Networks at Scentre Group (Westfield) • Large scale infrastructure and funding and delivery • Building & property management • Renewable energy innovation, project design and delivery • Global investment banking funds management and capital markets • Corporate energy purchasing and regulatory engagement. • Policy setting and engagement. <p>Additionally, Energy Intelligence, with over 13 years' experience, is a leading Australian Embedded Network operator and is highly respected in the industry.</p>
1.2	The form/s of energy sold	<p>Retail entity CEP.Energy is a newly established entity without previous experience as an energy retailer.</p> <p>Previous operations of related entities relating to the sale of electricity can be found in the Business Plan (Annexure C1) and the Energy</p>

		<p>Intelligence Capability Statement (Annexure A10).</p> <p>CEP.Energy will have access to renewable and stored energy with the goal to provide long term sustainable energy solutions to property portfolio owners and consumers.</p>
1.3	The scale of operations (including the number and size of customers)	<p>Retail entity CEP.Energy is a newly established entity without previous experience as an energy retailer.</p> <p>The scale of operations by related entities is explained in the Business Plan (Annexure C1) and the Energy Intelligence Capability Statement (Annexure A10).</p> <p>CEP.Energy has access to renewable and stored energy through some of Australia's largest Commercial and Industrial property portfolios, including iconic industrial parks, with recognised growing demand in an undersupplied sector of the energy market.</p>
1.4	A description of how the retail activities were conducted	<p>Retail entity CEP.Energy is a newly established entity without previous experience as an energy retailer.</p> <p>A description of how retail activities were conducted are explained in the Business Plan (Annexure C1) and the Energy Intelligence Capability Statement (Annexure A10).</p> <p>CEP.Energy is able to provide unique long term, sustainable renewable and energy storage capability to property owners and consumers in a recognised undersupplied sector in the current volatile geo-political market.</p>
Criterion 2	Details of any other relevant retail or energy market experience	<p>The key staff have signification experience in the energy market. Please refer to:</p> <ul style="list-style-type: none"> • <i>Summary of key individuals</i> (Annexure A4)

		<ul style="list-style-type: none"> • <i>CVs of key employees (Annexure A5)</i> • <i>“Key People” section of the Business Plan (Annexure C1)</i>
Criterion 3	Where you do not have previous energy market experience, how you intend to bring this experience into your business	<p>In relation to the following areas, CEP.Energy will bring in experience as follows:</p> <p>a. Compliance and regulatory support (Compliance Quarter)</p> <p>Please see Annexure A6 for a copy of the agreement with Compliance Quarter</p> <p>b. Engineering, procurement, and construction (Enerven)</p> <p>Please see Annexure A8 for a copy of the agreement with Enerven</p>
Criterion 4	An organisation chart showing the structure of your organisation (this should include Board members and Operational Managers)	Please see Annexure A2 for a copy of the CEP.Energy organisation chart.
Criterion 5	The number of employees, broken down by business unit or other relevant classification (are employees shared with any other entities)	<p>There are 33 employees broken up into the following business units:</p> <ul style="list-style-type: none"> • <i>Board (3)</i> • <i>Senior Advisors (3)</i> • <i>Management (9)</i> • <i>Finance (10)</i> • <i>Compliance and Risk (2)</i> • <i>Operations (11)</i> • <i>Sales and Marketing (7)</i> • <i>Technical (5)</i> <p>These employees are shared with other entities within the group, as per the Shared Services Agreement (Annexure C11)</p>

<p>Criterion 6</p>	<p>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>	<p>CEP Energy has engaged a number of individuals that have significant experience in the energy industry and in their respective fields.</p> <p>Please see Annexure A4 (Providers and individuals) for a summary of their skills and experience, and Annexure A5 (Key Personnel – CV's) for a copy of their CV's.</p> <p>The key officers are as follows:</p> <ol style="list-style-type: none"> 1. <i>Henry Pinski</i> (Executive Director) 2. <i>Peter Wright</i> (MD and CEO) 3. <i>Rod Howard</i> (Senior Advisor) 4. <i>Cameron O'Reilly</i> (Senior Advisor) 5. <i>Mark Stedwell</i> (Senior Advisor) 6. <i>Neil Robinson</i> (Head of Analytics and Finance) 7. <i>Marjorie Maydwell</i> (Compliance and Energy Markets Director) 8. <i>Dan Lowenthal</i> (Chief Development Officer) 9. <i>Mardi Trezise</i> (Delivery Partner Embedded Network Director) 10. <i>Kym Roberts</i> (Operations Manager) 11. <i>Brendan Laidlaw</i> (Project Implementation Manager)
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2.2 Third party involvement (Criterion 7)

Criterion from Guideline	Required information	Response from CEP.Energy
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 -	Please refer to Annexure A4 (Providers and Individuals) which contains the list of third parties engaged by CEP.Energy.
7.1	State all functions and activities you propose to outsource	CEP.Energy will outsource the following functions: a. Compliance and regulatory support (Compliance Quarter) b. Engineering, procurement, and construction (Enerven)
7.2	Provide a summary of the third party's experience in, and knowledge of, the relevant area	Please see Annexure A4 (Key Providers and Individuals) which contains a summary of the third parties engaged by CEP.Energy.
7.3	Provide evidence of the third party's technical capacity to meet relevant obligations	The third parties engaged are experts in their respective fields. Please see the Capability Statements which outline the skills, experience, and technical capacity of the third parties engaged by CEP.Energy: Annexure A7 - Compliance Quarter - Capability Statement Annexure A9 - Enerven - Capability Statement
7.4	Provide evidence of controls in place to ensure	Please refer to the attached Third-Party Process Policy (Annexure B12) explaining the

	the third party's compliance with the Retail Law and Retail Rules (this may include contracts, deeds and/or policies with other parties)	controls implemented by CEP.Energy with respect to the engagement of third parties, to ensure compliance with the Retail Law and Retail Rules.
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2.3 Business plan (Criterion 9)

Please refer to **Annexure C1** 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 C3- C7**.

2.4 Compliance strategy (Criterion 9)

CEP.Energy is committed to an effective compliance program implemented in accordance with AS/ISO 19600:2015. CEP.Energy's Compliance Policy (**Annexure B2**) demonstrates the extent to which the standard has guided CEP.Energy.

CEP.Energy 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 B13**, provided on a commercial in confidence basis.

The board of CEP.Energy 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 CEP.Energy 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 CEP.Energy.*

- External Advice: CEP.Energy, as part of its compliance program, obtains advice on compliance and legal issues from a number of qualified external providers.
- Information Technology: CEP.Energy implements a range of technological solutions that aid in the CEP.Energy'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: CEP.Energy has developed procedures and policies related to operational processes to ensure regulatory compliance. These documents are provided to employees to ensure implementation of practices in compliance.
- Compliance Risk Assessments: CEP.Energy 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.

Criterion from Guideline	Required information	Response from CEP.Energy
Criterion 9	Details of your compliance strategy	<p>Please refer to the statement above and the attachments (provided on a commercial in confidence basis) that cover CEP.Energy's compliance strategy:</p> <ul style="list-style-type: none"> • Annexure B2: Compliance Policy. • Annexure B3: Compliance Reporting Procedure. • Annexure B4: Code of Ethics. • Annexure B5: Customer Hardship Policy. • Annexure B6: Risk Management Policy. • Annexure B7: Risk Register / Matrix • Annexure B8: Complaints Policy.

		<ul style="list-style-type: none"> • Annexure B9: Human Resources Policy • Annexure B10: Privacy Policy. • Annexure B11: Audit Policy • Annexure B13: Obligations Register • Annexure B25: Family Violence Policy
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>Please find attached to this application an Obligations Register (Annexure B13) that has been developed by our external consultants Compliance Quarter, to be used by CEP.Energy in understanding and complying with the obligations imposed on authorised retailers.</p> <p>CEP.Energy have developed a suite of policies and procedures to ensure understanding and compliance with obligations imposed on authorised retailers. In addition to the those listed above, please refer to the following procedures / documents:</p> <ul style="list-style-type: none"> • Annexure B14: Summary of Rights and Obligations. • Annexure B15: Website Notices. • Annexure B16: Retailer Credit Reporting Checklist. • Annexure B17: NECF Regulatory Guide to Door-to-Door sales. • Annexure B18: NECF- Marketing and Advertising Requirements in NECF. • Annexure B19: NECF Market Retail Contract Checklist. • Annexure B20: NECF Hardship Policy Checklist. • Annexure B21: NECF disconnection for non-payment checklist. • Annexure B22: NECF Explicit Informed Consent Checklist. • Annexure B23: NECF Checklist for Energy Bill; and

		<ul style="list-style-type: none"> • Annexure B24: Energy Retailer Key Reporting Dates
9.2	<p>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>	<p>We refer you to the various annexures outlined above in Criterion 9 that demonstrate how the applicant will ensure compliance (including breach identification and remediation).</p> <p>In particular:</p> <ul style="list-style-type: none"> • Annexure B2: Compliance Policy. • Annexure B3: Compliance Reporting Procedure); and • Annexure B13 Obligations Register.
9.3	<p>Including complaint and dispute resolution 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>Please refer to the Complaints Policy Annexure B8).</p> <p>The applicant is committed to freely receiving and resolving complaints in an accessible and transparent way. In all instances, the applicant will:</p> <ul style="list-style-type: none"> • <i>Freely accept complaints lodged on our website, in person, by telephone, facsimile, email or letter.</i> • <i>Acknowledge any complaint received as soon as possible.</i> • <i>Begin an investigation into the reasons for a complaint within 24 hours of acknowledgment.</i> • <i>Keep the complainant updated about the investigation and any proposed resolution.</i> • <i>Notify the complainant as soon as possible of the outcome of our investigation and any proposal we have for resolution; and</i> • <i>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.</i>

9.4	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).	Please refer to the attached HR Policy (Annexure B9) for information about induction, training, recruitment to fill gaps in skills and knowledge. The Business Plan (Annexure C1) also references ongoing monitoring in the “Skill and staff retention strategies” section.
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2.5 Risk management strategy (Criterion 10 to 12)

Criterion from Guideline	Required information	Response from CEP.Energy
Criterion 10	A copy of your risk management strategy covering both operational and financial risks	Please find attached to this application a copy of CEP.Energy's Risk Management Policy (Annexure B6) covering both operational and financial risks. This is supported by the Risk Register / Matrix (Annexure B7) which identifies and maps out various risks, controls, monitoring plan.
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 (Annexure B1)
Criterion 12	Any additional information which demonstrates your ability to manage risk and operate in accordance with	The AER will be provided with a login to a compliance system that will be used in the management of our compliance program.

	the Retail Law objective, particularly the long-term interests of consumers (for example, copies of any retail contracts that you have developed)	
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2.6 Agreements in place with key market players within the relevant jurisdictions (distribution businesses and AEMO (Australian Energy Market Operator)) If agreements not finalised provide information as to negotiations (Criterion 13 to 15)

Criterion from Guideline	Required information	Response from CEP.Energy
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	<p>CEP.Energy has submitted membership inquiries to following Ombudsman schemes:</p> <ul style="list-style-type: none"> • <i>NSW: Energy and Water Ombudsman New South Wales (EWON).</i> • <i>SA: Energy & Water Ombudsman (EWOSA)</i> • <i>QLD: Energy and Water Ombudsman Queensland (EWOQ)</i> <p>Please see Annexure A12 for copies of communication with these entities.</p> <p>Prior to entry into each respective market, membership will be obtained with the relevant Ombudsman schemes.</p>
Criterion 14	Evidence of any agreements / arrangements in place with key market players within the jurisdictions in which	<p><u>CEP.Energy Pty Ltd (CEP)</u></p> <p>Parent entity CEP holds AER Retail & Network Individual Exemptions and operate the following properties:</p>

	<p>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</p>	<p>[REDACTED]</p> <p><u>Energy Intelligence</u></p> <p>Related entity and wholly owned subsidiary of CEP, Energy Intelligence’s Market Role includes full Accreditation as an embedded network manager (ENM) with AEMO and includes an excellent status for monthly AEMO ENM Compliance Report performance since 2018.</p> <p>Energy Intelligence works closely and co-operatively with the ESC and AER.</p> <p>With several staff members on the EWOV EN Working Group and AEMC (Australian Energy Market Commission) stakeholder Group and, in the role as an Accredited ENM with AEMO, Energy Intelligence constantly updates and reviews processes as changes in regulation unfold.</p> <p>Energy Intelligence is heavily involved within the legislative arena, writing white paper responses, providing stakeholder feedback, and advising government bodies such as the ESC, AEMO, AEMC, AER and EWOV on operational intricacies of the energy market and embedded networks.</p>
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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	CEP.Energy will onsell electricity from the gate meter. The likelihood of a failure of CEP.Energy is low noting the financial resources of the company. Should CEP.Energy fail, the occupants of embedded networks will continue to be supplied with electricity. CEP.Energy will ensure it includes relevant clauses in its contracts with owners' corporations allowing for the continuation of services.
Criterion 15	Any additional information that will help us assess your organisational and technical capacity	CEP.Energy has conducted a thorough analysis of current market conditions to ensure the business can withstand the volatility of the market, and ultimately thrive. CEP.Energy has provided detail regarding the AER's additional information requirement concerning current market conditions. Please see the Market Report (Annexure C2) for further information.

3. Part Three: Required information – financial resources (Criterion 1 to 9)

The applicant is an existing business. Below we address criterion 1 to 9.

Criterion from Guideline	Required information	Response from CEP.Energy
Criterion 1	<u>Existing businesses</u> Copies of your audited financial reports for the past 12 months (note, we may ask for the previous two years' reports, if necessary). This	CEP Energy Retail Pty Ltd is not an 'existing business', therefore this section does not apply. It is a new 'start-up' business registered on 21 March 2022, which has not been trading since its inception.

	<p>information should include:</p> <ul style="list-style-type: none"> • All financial statements required by the accounting standards. • Notes to financial statements (disclosure required by the regulations, notes required by the accounting standards, and any other information necessary to give a true and fair view). 	<p>Further information required by start-ups is provided below.</p>
Criterion 2	<p><u>Existing businesses</u></p> <p>Evidence of long and / or short-term credit rating/s (if available).</p>	<p>CEP Energy Retail Pty Ltd is not an 'existing business', therefore this section does not apply.</p> <p>It is a new 'start-up' business registered on 21 March 2022, which has not been trading since its inception.</p> <p>Further information required by start-ups is provided below.</p>
Criterion 3	<p><u>Start-up businesses</u></p> <p>Details and evidence of your current financial position (most recent fiscal year). For example, interim financial statements (statement of profit or loss, statement of cash flows, statement of financial position), current bank</p>	<p>CEP Energy Retail Pty Ltd is a new 'start-up' business registered on 21 March 2022, which has not been trading since its inception.</p> <p>However, evidence of current financial position can be demonstrated as follows:</p> <ul style="list-style-type: none"> • Annexure C10: [REDACTED] • Annexure C9: [REDACTED]
Criterion 4	<p><u>Existing and Start-up businesses</u></p> <p>If you are part of a group of related companies,</p>	<p>CEP Energy Retail Pty Ltd is part of a group of related companies. Please find attached (Annexure A1) a copy of an ASIC extract including details of ownership of the company.</p>

	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 -	
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.	Please see Annexure A3 for a diagram of the ownership structure of the group
4.2	The contractual arrangements (e.g., 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	Please see the following contractual documents between entities in the group. <ul style="list-style-type: none"> • Annexure C10: [REDACTED] • Annexure C11: <i>Shared Services Agreement</i>
4.3	Consolidated audited financial statements for the group	Please see Annexure C8 for the CEP Energy Pty Ltd financial statements for the financial years FY2022, FY2021, FY2020.
Criterion 5	A written declaration, within 6 months of the application being	Please see attached for a written declaration addressing this criterion: Annexure D1: Criterion 5 Declaration (Financial)

	<p>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</p>	
Criterion 6	<p>A written declaration, from an independent auditor/accountant or your principal financial institution stating that -</p>	<p>Please find attached a written declaration answering this criterion: Annexure D2: Criterion 6 Declaration (Financial)(Auditor)).</p>
6.1	<p>An insolvency official has not been appointed in respect of the business or any property of the business</p>	<p>CEP.Energy confirms that an insolvency official has not been appointed in respect of the business or any property of the business.</p> <p>Please see declaration at Annexure D2: Criterion 6 Declaration (Financial)(Auditor)</p>
6.2	<p>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</p>	<p>CEP.Energy 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.</p> <p>Please see declaration at Annexure D2: Criterion 6 Declaration (Financial)(Auditor)</p>

6.3	They are unaware of any other factor that would impede your ability to finance your energy retail activities under the authorisation	CEP.Energy is unaware of any other factor that would impede its ability to finance its energy retail activities under the authorisation. Please see declaration at Annexure D2: Criterion 6 Declaration (Financial)(Auditor)
Criterion 7	Details of any bank guarantees or arrangements or process to access additional capital	<div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px;"></div>
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 following financial forecast provided in excel. They cover 5 distinct scenarios: <ul style="list-style-type: none"> • Annexure C3: <i>Financial Model - Baseline</i> • Annexure C4: <i>Financial Model - Scenario 1</i> • Annexure C5: <i>Financial Model - Scenario 2</i> • Annexure C6: <i>Financial Model - Scenario 3</i> • Annexure C7: <i>Financial Model - Scenario 5</i>
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).	CEP.Energy has provided detail regarding the AER's additional information requirement concerning financial capacity. Please see the Market Report (Annexure C2) for further information.

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

CEP Energy 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 CEP.Energy
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 -	Please refer to the individual responses below and the attached declarations
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.	There have been no such events. See Annexure D3: Criterion 1 Declaration (Suitability)

1.2	any previously revoked authorisations, authorities or licences held in any industry and the reason/s for the revocation	There have been no such events. See Annexure D3 : Criterion 1 Declaration (Suitability)
1.3	any failed authorisation, authority or licence applications in any industry and the reason/s the application was unsuccessful	There have been no such events. See Annexure D3 : Criterion 1 Declaration (Suitability)
1.4	any past or present administrative or legal actions in relation to an authorisation, authority, or licence in any industry	There have been no such events. See Annexure D3 : Criterion 1 Declaration (Suitability)
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	There have been no such situations. See Annexure D3 : Criterion 1 Declaration (Suitability)
Criterion 2	Details of any offences or successful	There have been no such offences or prosecutions.

	<p>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 written confirmation that no offences have been committed against, or been prosecuted under, any such legislation. This information must be provided for -</p>	<p>See Annexure D4: Criterion 2 Declaration (Suitability)</p>
2a	<p>your current director/s (or shadow / de facto director/s), and any other person that exerts control over your business activities</p>	<p>There have been no such offences or prosecutions.</p> <p>See Annexure D4: Criterion 2 Declaration (Suitability)</p>
2b	<p>if your business is unincorporated, the person/s with effective control of the business</p>	<p>Not applicable.</p>
2c	<p>all persons who are responsible for significant operating</p>	<p>There have been no such offences or prosecutions.</p>

	decisions for your business	See Annexure D4 : Criterion 2 Declaration (Suitability)
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) -	Please refer to the attached declaration. Annexure D5 : Criterion 4 Declaration (Suitability)
4.1	that members of your management team have not been disqualified from the management of corporations	As above. See Annexure D5 : Criterion 4 Declaration (Suitability)
4.2	about the record of bankruptcy of your management team (including in any overseas area)	As above. See Annexure D5 : Criterion 4 Declaration (Suitability)
Criterion 5	Full names and current residential addresses of all your officers	Please refer to Annexure A1 (ASIC extract) for names and residential addresses of officers.
Criterion 6	Details of policies and procedures addressing the probity and competence of officers and any other key management staff	Please refer to the attached: <ul style="list-style-type: none"> • Annexure B4: Code of Ethics • Annexure B9: Human Resources Policy • Annexure B11: Audit 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>Please find attached documents which are relevant to this component of the application:</p> <ul style="list-style-type: none"> • Annexure B2: Compliance Policy. • Annexure B4: Code of Ethics; and • Annexure B9: Human Resources Policy
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Version Control

Version	Amendment	Author and Date
Version 1	Not applicable	CJ 03/03/2023
Version 2	Final consolidation	LS 31/05/2023
Version 3	Further information and review	MM 1/06/2023

5. Annexures

Document	Description	Confidential
Operational and Technical		
Annexure A1	ASIC Extract	No
Annexure A2	CEP.Energy Organisational Chart	No
Annexure A3	CEP.Energy Group Structure Diagram	No
Annexure A4	Providers and Individuals	Yes
Annexure A5	Key Personnel - CVs	Yes
Annexure A6	Compliance Quarter - Agreement	Yes
Annexure A6a	Compliance Quarter – Deed of Novation	Yes
Annexure A7	Compliance Quarter - Capability Statement	No
Annexure A8	Enerven – Agreement	Yes
Annexure A9	Enerven- Capability Statement	No
Annexure A10	Energy Intelligence – Capability Statement	Yes
Annexure A11	Energy Intelligence – Roadmap	Yes
Annexure A12	Copy of Ombudsman letter	No
Policies and Procedures		
Annexure B1	External review of compliance and risk management letter	No
Annexure B1a	External review of compliance and risk management report	No
Annexure B2	Compliance Policy	No
Annexure B3	Compliance Reporting Procedure	Yes
Annexure B4	Code of Ethics	No
Annexure B5	Customer Hardship Policy	No

Annexure B6	Risk Management Policy	Yes
Annexure B7	Risk Register / Matrix	Yes
Annexure B8	Complaints Policy	No
Annexure B9	Human Resources Policy	Yes
Annexure B10	Privacy Policy	No
Annexure B11	Audit Policy	Yes
Annexure B12	Third Party Process Policy	No
Annexure B13	Obligations Register	Yes
Annexure B14	Website Notices	Yes
Annexure B15	Summary of Rights and Obligations	Yes
Annexure B16	Retailer Credit Reporting Checklist	Yes
Annexure B17	NECF Regulatory Guide to Door-to-Door sales	Yes
Annexure B18	NECF- Marketing and Advertising Requirements in NECF	Yes
Annexure B19	NECF Market Retail Contract Checklist	Yes
Annexure B20	NECF Hardship Policy Checklist	Yes
Annexure B21	NECF disconnection for non-payment checklist	Yes
Annexure B22	NECF Explicit Informed Consent Checklist	Yes
Annexure B23	NECF Checklist for Energy Bill	Yes
Annexure B24	Energy Retailer Key Reporting Dates	Yes
Annexure B25	Family Violence policy	No
Annexure B26	Wholesale Risk Management strategy	Yes
Business Plan and Financial Information		

Annexure C1	Business Plan	Yes
Annexure C2	Market report	Yes
Annexure C3	Financial Model – Baseline	Yes
Annexure C4	Financial Model – Scenario 1	Yes
Annexure C5	Financial Model – Scenario 2	Yes
Annexure C6	Financial Model – Scenario 3	Yes
Annexure C7	Financial Model – Scenario 4	Yes
Annexure C8	Audited / Unaudited Financial Reports FY2022	Yes
Annexure C9	Bank statement / evidence of finance	Yes
Declarations		
Annexure D1	Criterion 5 Declaration (Financial)	No
Annexure D2	Criterion 6 Declaration (Financial)(Auditor)	No
Annexure D3	Criterion 1 Declaration (Suitability)	No
Annexure D4	Criterion 2 Declaration (Suitability)	No
Annexure D5	Criterion 4 Declaration (Suitability)	No

ASIC EXTRACT SNAPSHOT

CURRENT ORGANISATION DETAILS

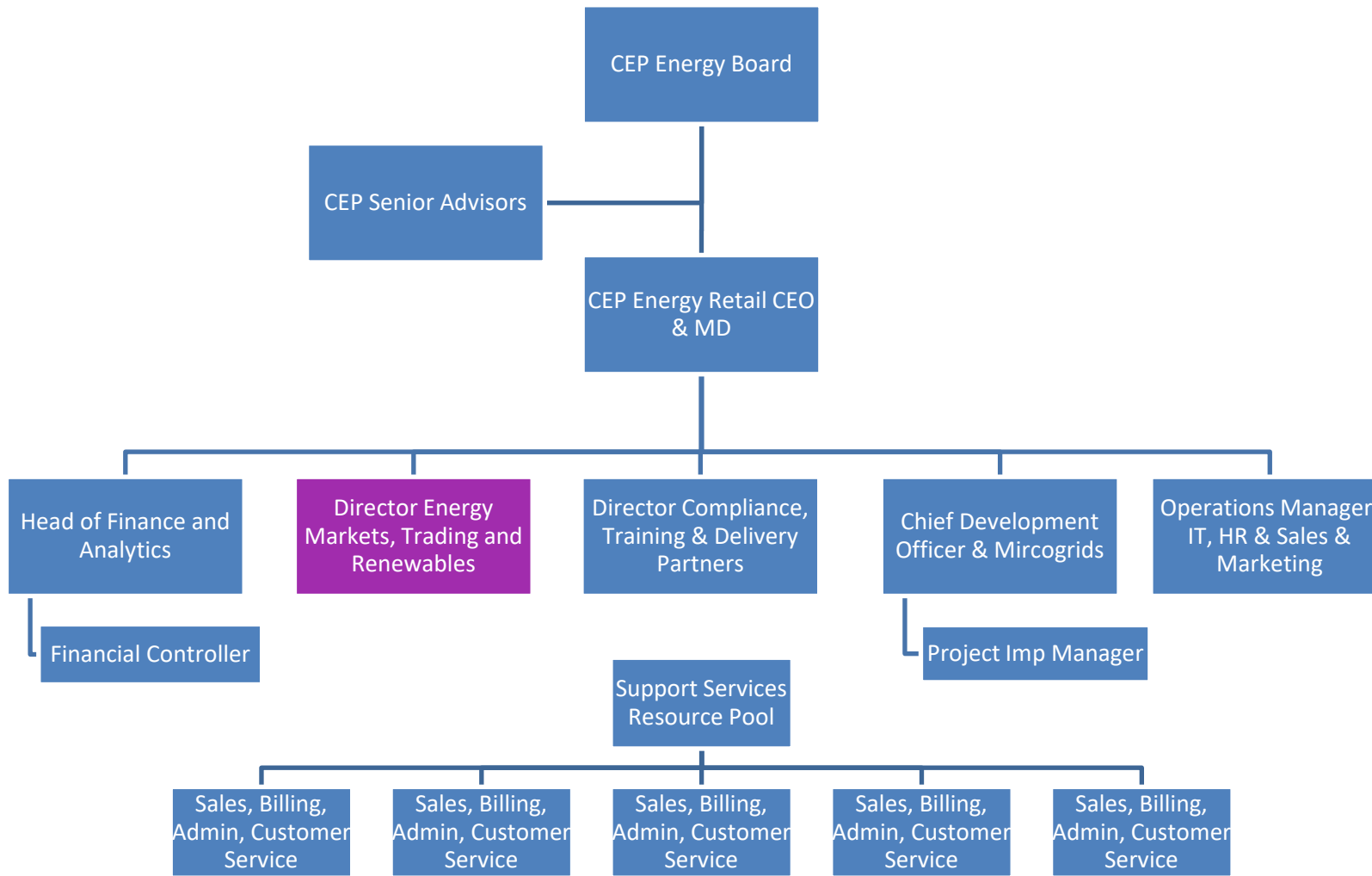
Date Extracted	30/05/2023
ACN	658 178 404
ABN	30 658 178 404
Current Name	CEP ENERGY RETAIL PTY LTD
Registered In	Victoria
Registration Date	21/03/2022
Review Date	21/03/2024
Company Type	ACN (Australian Company Number)
Current Directors	2
Current Secretaries	0

Start Date	05/05/2023
Name	CEP ENERGY RETAIL PTY LTD
Name Start Date	05/05/2023
Status	Registered
Type	Australian Proprietary Company
Class	Limited By Shares
Sub Class	Proprietary Company
Disclosing Entity	No

Share Structure (Displaying Top 4 Only)

[Go to Full ASIC Results](#)

CEP Energy Retail Pty Ltd- Organisational Structure



 Shared resource
 To recruit

CEP Energy Retail About us

A diverse and experienced management team that is committed to the success of the development of the renewable and storage energy platform:

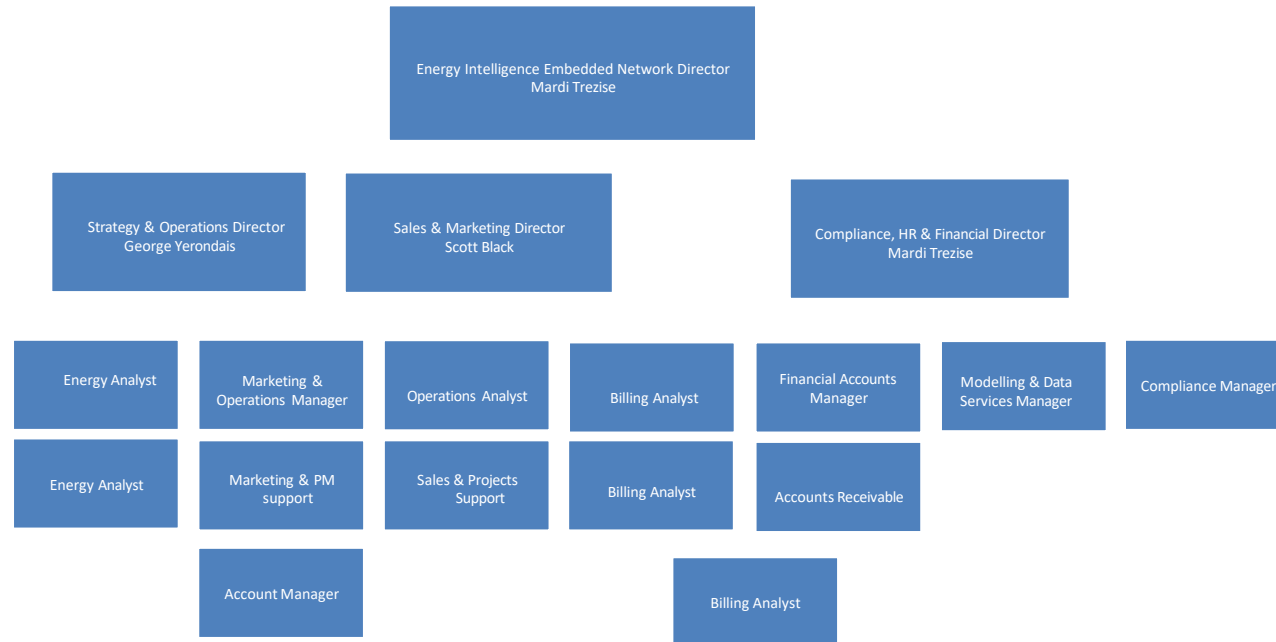
- Former Head of Operations at AEMO
- Former Deputy CEO of Endeavour Energy
- Former Executive Director of Macquarie Bank
- Former Director of Energy Intelligence
- Former Retail Manager of NSW 777 & 776 Contracts
- Former Head of Embedded Networks at Scentre Group (Westfield)
- Large scale infrastructure and funding and delivery
- Building & property management
- Renewable energy innovation, project design and delivery
- Global investment banking funds management and capital markets
- Corporate energy purchasing and regulatory engagement
- Policy setting and engagement



A team with the breadth and depth of expertise and industry connection...

- Board **CEP Energy Board**
- Senior Advisors – **Mark Stedwell, Cameron O'Reilly, Rod Howard**
- CEO & MD **Peter D Wright**
 - Head of Finance & Analytics (billing / network settlements) **Neil Robinson**
 - Financial Controller **Nirmalie Goonetilleke**
 - Energy Markets Director, Trading and Renewables Market & data analyst **TO RECRUIT**
 - Chief Development Officer & Microgrid (Embedded Networks) **Dan Lowenthal**
 - Projects Implementation Manager **Brendan Laidlaw**
 - Director Compliance, Training and Delivery Partners **Marjorie Maydwell**
 - Operations Manager, IT, PR, Sales & Marketing **Kym Roberts**
 - Energy Intelligence **Mardi Trezise**
- Sales, Billing, Admin, Customer Service
- Sales, Billing, Admin, Customer Service
- Sales, Billing, Admin, Customer Service
- Sales, Billing, Admin, Customer Service
- Sales, Billing, Admin, Customer Service

...with a strong, motivated organisational culture

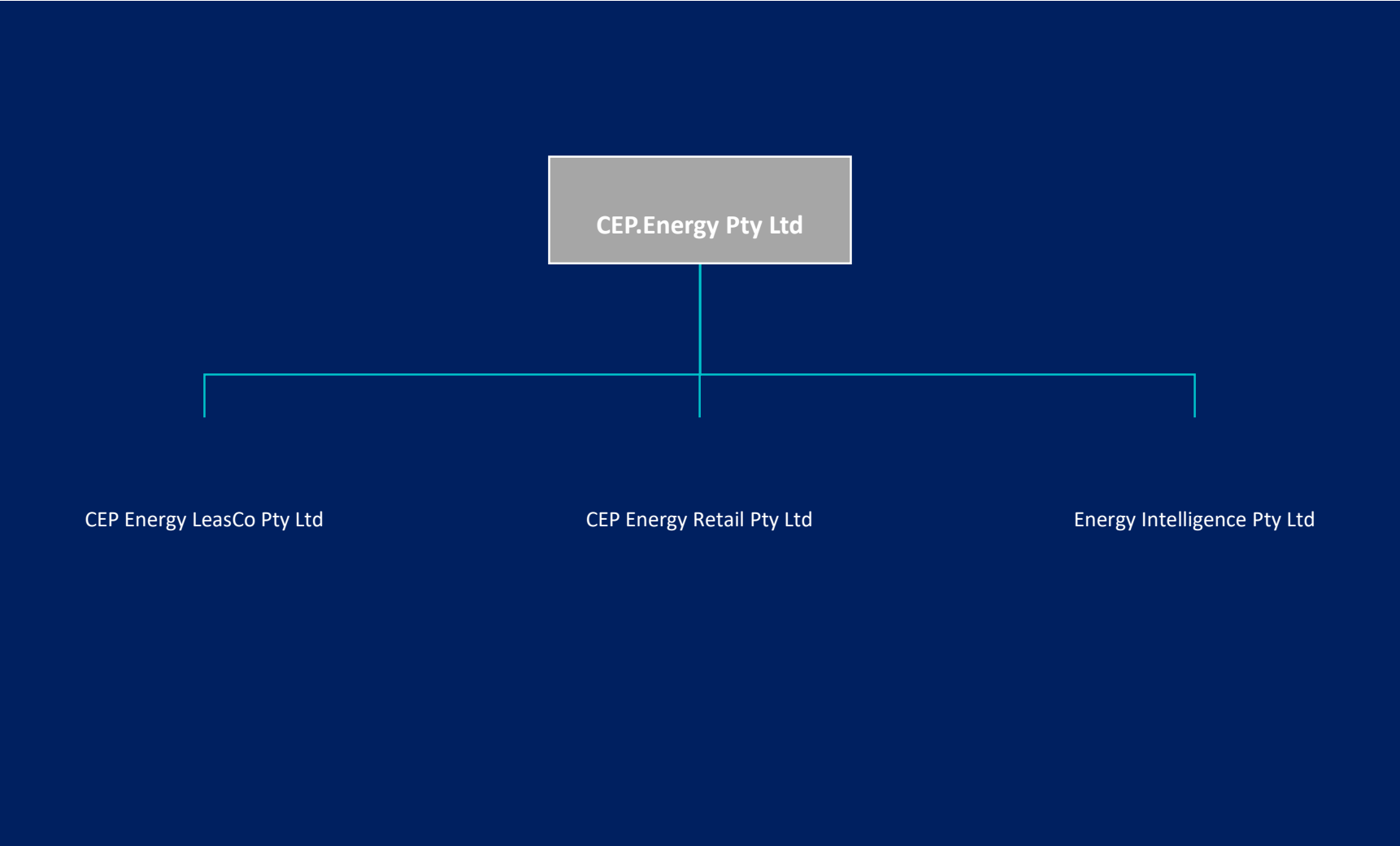


Shared resource

- Embedded Networks - Energy Intelligence**
- 12 years of successful track record
 - Leading independent end to end embedded network service provider
 - Strong track record of regulatory compliance
 - 10,000+ existing C&I customers across Victoria, NSW, SA, TAS and QLD
 - Clients are large scale institutional property owners
 - Tenant energy supply take-up rate of approx. 96%
 - Tenant churn is less than 1%



CEP.Energy - Company Structure



COMPLIANCE QUARTER: PROFILE



WWW.COMPLIANCEQUARTER.COM.AU

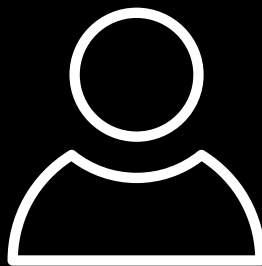
WHY

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

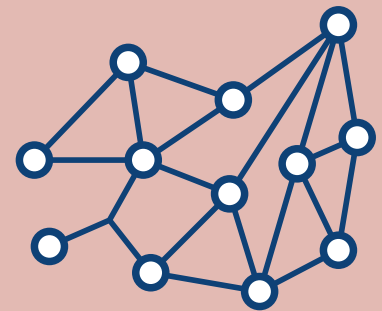
With energy expertise



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 including the Australian Securities and Investment Commission (ASIC)- 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

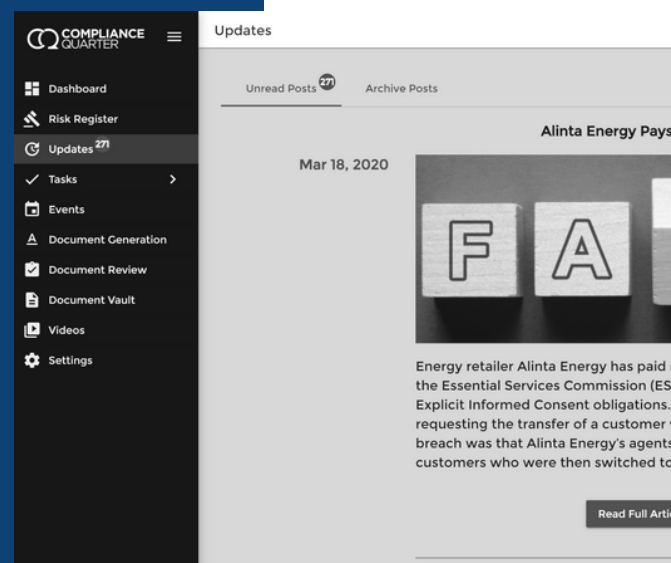
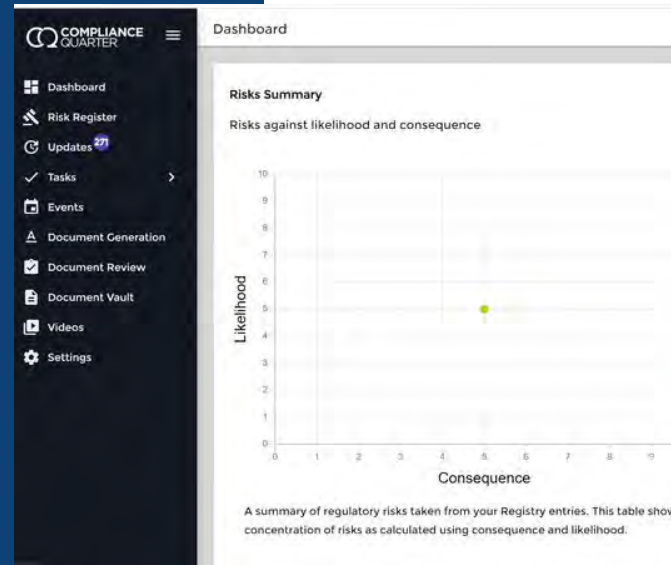
Automated document review using Titan, built in consultation with data scientists from Oxford, UK.

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.

Embedded Networks

Enerven Embedded Networks create significant efficiencies, opportunities and savings for developers, network owners and consumers alike.

An embedded network is a private electricity network that serves multiple customers. It is connected to the national grid through a single connection point, and is operated by a party known as the embedded network operator (ENO).

At Enerven, our solution is distinctive. We can provide our customers with a holistic solution covering all aspects of engineering, construction, connecting and operating a private network. We pride ourselves on being a trusted and dependable partner that can develop an embedded network solution that meets our client's specific requirements.

Our commercial, industrial and residential solutions deliver reliable and affordable energy as an alternative to the traditional market mechanisms. Our innovative approach centres on using new technologies, which integrate seamlessly to create distribution systems that meet the energy needs of our evolving society.

Within our embedded networks, end-users join a more sustainable, independent network, generating, storing and selling renewable energy outside the traditional market retailers' networks. They reduce infrastructure costs and ultimately provide the end-users with the most economical energy solution.

The requirements of each electrical network differ greatly, and a tailored approach is vital to delivering the right solution and ultimately deploying appropriately sized infrastructure. Our team's experience, knowledge and skills, allows us to develop the most suitable, sustainable and effective embedded network solution possible; and as a subsidiary of SA Power Networks, we have a strong history and track record, which makes us the ideal partner for creating your embedded network.

Designing, building and running embedded networks requires specialised skills and expertise, and Enerven has the resources and the experience required to deliver on all disciplines. We are highly skilled in all aspects of high and low voltage installation, maintenance and termination, including live line, glove and barrier and bare hand operating techniques.

Our collaborative approach ensures that you receive the most suitable, sustainable and efficient solution tailored to your specific needs.

Our Capabilities

Enerven creates, operates, optimises, and maintains private electricity networks, including engineering the solutions.

These capabilities apply to microgrids, energy storage solutions and vehicle charging stations.

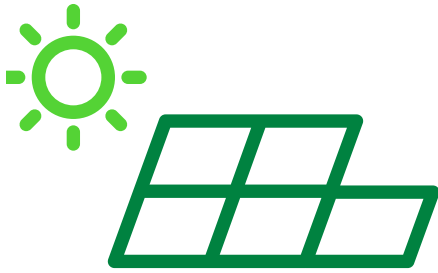
Our capabilities include:

- Sub-transmission and distribution planning and design
- Power system protection, asset augmentation, and load flow analysis
- Asset condition monitoring and inspections
- Reliability management including emergency response
- Programmed maintenance
- Construction and commissioning
- Live line, glove and barrier, and bare hand HV and EHV techniques
- Protection and control of asset

We build strong relationships with our project partners and work alongside them to develop the most suitable embedded network solution possible.

Our capabilities allow us to deliver complete turnkey packages on behalf of clients, or assist with specific project elements.





Our Services

- Governance - Business, regulatory, compliance advice, auditing and systems
- Electrical network design and construction
- Network operations and maintenance
- Network ownership
- Jurisdictional and national regulatory roles (including Distribution Licence Holder, Embedded Network Operator, Embedded Network Manager, Metering Coordinator)
- Distributed Energy Resource solutions (solar PV, storage and generation)
- Energy optimisation
- Energy management systems
- Energy re-selling

Why Enerven?

We develop solutions with customers and communities to enable them to choose, create and adapt how they connect with, make, store and use energy, on their terms. Enerven began as a division of SA Power Networks¹ and over fifteen years, has grown to be a market leader.

We pride ourselves on thoroughly understanding each project and client's needs and we work with you to create a tailored solution that fulfils and exceeds expectations.

Our extensive experience in the industry make us a reliable player in the market with a service offering that is hard to beat.

Building on the 100-year foundation, Enerven is a proven expert in the development of major infrastructure, energy and telecommunications solutions.

Proactive, Collaborative, Dependable

Our values are the DNA of our business. They embody what we stand for and focus firmly on our customers' needs to accomplish long term, sustainable improvements that are reliable, maximise profitability and minimise costs.

Further to this, everything we do is underpinned by an unrelenting focus on safety and wellbeing.

We build our customers' vision. Our driving ambition is to connect you with tomorrow.

Who We Are

Enerven provides construction and maintenance services to clients both within SA and nationally. We believe innovation and technology will continue to drive efficiencies, but no more so than the experience and knowledge of our people.

Contact Us

1 Station Place,
Hindmarsh SA 5007

1300 334 523

enquiries@enerven.com.au

www.enerven.com.au

¹Enerven is a wholly owned subsidiary of SA Power Networks operating independently and is the business name used by Enerven Energy Infrastructure Pty Ltd (ABN 31 621 124 909)

Enerven is accredited to AS/NZS ISO 14001 and is compliant to all regulatory requirements. We maintain full compliance with Australian Standard AS/NZ 4801 and have achieved the internationally recognised ISO18001 accreditation

From: Vanessa Concepcion [REDACTED] >
Sent: Tuesday, May 9, 2023 3:07 PM
To: Marjorie Maydwell [REDACTED] >
Subject: EWON membership - CEP Energy Retail
Attachments: New member application material Authorised Retailer.pdf; New Member application form.pdf; Membership Agreement.pdf; Full Complaint Handling Policy Template.docx; List of Contacts.docx

Hi Marjorie

It was lovely speaking with you.

As discussed, EWON membership is required after CEP Energy Retail is granted retail authorisation from the AER, and prior to you retail marketing to customers.

Please see information below outlining what is required of CEP Energy Retail to join EWON as an authorised retailer.

When completing documents, please use the same company name (and ABN) used to register your authorisation with the AER.

1. Membership Agreement form (to be signed by the CEO/managing director)
2. Application form (to be signed by the CEO/managing director)
3. A copy of your AER authorisation
4. A copy of your most recent audited financial statements
5. Complaints Handling Policy – (please refer to our Full Complaint Handling Policy Template attached)
6. Staff contact details (see attached contacts list)

Please note we look very closely at your referral of EWON in the Complaint Handling Policy and your website, so I would encourage you to review page 5, 6 and 7 of our Membership Application pack.

The Member fees table is located on p9, and there is a checklist on p12 to ensure that your application is complete.

Membership decisions are approved by the EWON Board. All information to support an application must be provided at least four weeks prior to the Board meeting.

If you'd like more detail about upcoming Board dates please let me know. Also, feel free to send me your application beforehand and I'd be happy to provide feedback and suggestions.

Please email me if you have any questions or we can arrange a suitable time to have a chat.

Kind regards

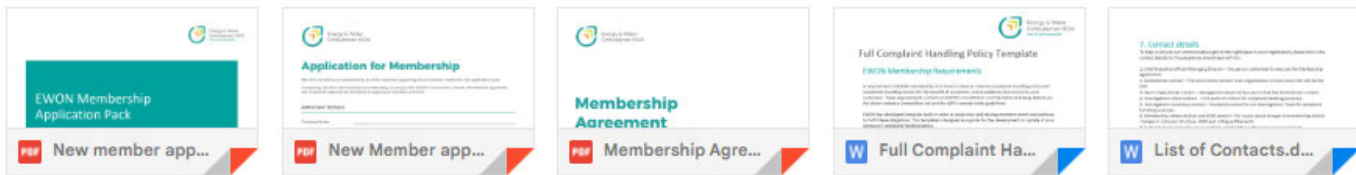
Vanessa Concepcion | Member Liaison Officer
Energy & Water Ombudsman NSW

::: Think before you print :::

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EWON acknowledges the Traditional Owners of the lands across New South Wales. We pay our respect to Elders past, present and emerging and we offer our thanks to Aboriginal communities who welcome us on to their land. ngara ngwiya yudi – listen, give, guide



From: member@ewoq.com.au <member@ewoq.com.au>
Sent: Monday, May 8, 2023 5:03 PM
To: Marjorie Maydwell [REDACTED] >
Subject: Thank you for your EWOQ scheme membership enquiry

Hi Marjorie,

Thank you for your scheme membership enquiry. Our team will get back to you shortly. If you haven't heard from us within three working days, please call 1800 662 837 or email member@ewoq.com.au

Here are your submission details:

Are you:: An authorised retailer

Your organisation

Organisation name: CEP ENERGY RETAIL PTY LTD

Your details

Salutation: Ms

First name: Marjorie

Surname: Maydwell

Position: Energy Market and Compliance Director

Phone: [REDACTED]

Email: [REDACTED]

Enquiry details: Dear EWOQ We are currently applying for a retail authorisation with the AER and ESC and would like to know what EWOQ require from CEP Energy Retail for us to lodge a membership application Kind regards Marjorie

From: Company Secretary [REDACTED] >
Sent: Tuesday, May 9, 2023 1:30 PM
To: Marjorie Maydwell [REDACTED] >; Company Secretary [REDACTED] >
Subject: EWOSA correspondence FW: Membership enquiry - CEP Energy Retail Pty Ltd EWOSA Fee Schedule -
Attachments: 2022-23.pdf

Hello Marjorie

Thank you for your time earlier.

As promised, please find attached our current schedule of fees. Please note that this is reviewed annually and a new schedule will be issued effective 1 July 2023. I can't release this yet as this is subject to approval.

If you have any questions in the meantime, please let me know.

Regards

Re Ouano

Manager Finance & Corporate Services



ENERGY & WATER
OMBUDSMAN SA

Energy & Water Ombudsman SA
GPO Box 2947 Adelaide SA 5001

T 08 8216 1837

Energy & Water Ombudsman SA acknowledges and respects the important connection of all First Nations people to their lands and waters. Together we can learn, as we listen and observe the world's oldest living culture, therefore harmonising with their customs and traditions.

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From: Marjorie Maydwell [REDACTED] >
Sent: Monday, May 8, 2023 4:04 PM
To: Company Secretary [REDACTED] >
Subject: Membership enquiry - CEP Energy Retail Pty Ltd

Dear Energy & Water Ombudsman South Australia

I am writing to you as CEP Energy Retail will shortly be applying for a retail authorisation from the AER & ESC and would like to understand what EWOSA require for CEP Energy Retail to lodge a membership application

Attached, for information is a letter with details pertaining to our company and application.

Kind regards
Marjorie

Marjorie Maydwell Energy Markets and Compliance Director

M [REDACTED]



A Level 1, 274 Victoria Street, Darlinghurst NSW 2010

W cep.energy E [REDACTED]

Developing Australia's largest
renewable energy and storage footprint.
Lease us your rooftop today.

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17th May 2023

Our Ref: 1071-29

Marjorie Maydwell
CEP. Energy Retail Pty Ltd
Level 1, 274 Victoria Street,
Darlinghurst NSW 2010

Dear Marjorie,

**Re: CEP. Energy Retail Pty Ltd Compliance and Risk Audit Action
Verification**

Further to Shared Safety and Risk's independent audit of CEP. Energy Retail Pty Ltd's compliance and risk management systems in May 2023, I can confirm that we have reviewed CEP. Energy Retail's audit response and verified completion of the recommended actions through document review.

As such we can confirm CEP. Energy Retail 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].

[REDACTED]

[REDACTED]

SUE CHENNELL
Exemplar Global Lead Auditor #114812
Director

Risk and Compliance External Audit

CEP. Energy Retail Pty Ltd

May 2023

Our Ref: 1071-29



SHARED
safety and risk

Shared Safety and Risk PO Box 2242 Clovelly NSW 2031

Statement of Limitations

This report has been prepared in accordance with the agreement between CEP. Energy Retail Pty Ltd and Shared Safety and Risk Pty Ltd.

Within the limitations of the agreed upon scope of services, this work has been undertaken and performed in a professional manner, in accordance with generally accepted practices, using a degree of skill and care ordinarily exercised by members of its profession and consulting practice. No other warranty, expressed or implied, is made.

This report is solely for the use of CEP. Energy Retail Pty Ltd and any reliance on this report by third parties shall be at such party's sole risk and may not contain sufficient information for purposes of other parties or for other uses. This report shall only be presented in full and may not be used to support any other objective than those set out in the report, except where written approval with comments are provided by Shared Safety and Risk Pty Ltd.

Risk and Compliance External Audit

CEP. Energy Retail Pty Ltd

Table of Contents

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2.2	<i>Structure of the Report</i>	4
3	Key Recommendations	5
4	Audit Exception Report-Risk and Compliance	6

1 Introduction and Scope

Shared Safety and Risk was engaged by CEP. Energy Retail Pty Ltd (CEP. Energy) to undertake an independent audit of their compliance and risk structure for the purposes of obtaining an authorised energy retailer authorisation. The key objective of the external assurance process is to verify that the CEP. Energy has suitable systems compliant with the requirements below and that it has the capacity to manage risk and to operate an effective and functional risk management and compliance system consistent with the relevant Australian Standards:

- 1) AS/ISO 19600:2015 Compliance management systems – Guidelines;
- 2) IS/ISO 31000:2009 Risk management – Principles and guidelines;
- 3) Energy Law (including the National Energy Retail Law, National Energy Retail Regulations and National Energy Retail Rules Version 8);
- 4) Telecommunications Act 1997;
- 5) Do Not Call Register Act 2006; and
- 6) Privacy Act 1988.

This audit is an impartial and comprehensive review of CEP. Energy's compliance and risk management systems to meet its obligations under the Retail Law and Retail Rules. Sue Chennell, Lead Auditor (#114812) undertook this audit in May 2023.

2 Methodology

In order to achieve the objective of the audit, the following activities were undertaken:

- 3.. Desktop review of relevant CEP. Energy's policies, procedures and documents;
- 3.. Consultation with key CEP. Energy stakeholders regarding the implementation of risk and compliance documents;
- 3.. Identification of compliance gaps against the legal and standard requirements set out above; and
- 3.. Development of this audit report highlighting findings and key remedial actions for compliance.

2.1 Documents Reviewed

Desktop review of the following Be Energy documentation was undertaken:

- CEP. Energy Compliance Policy v2 April 2023
- CEP. Energy Retail Compliance Reporting Procedure v2 April 2023
- CEP. Energy Third Party Management Policy v2 March 2023
- CEP. Energy Complaints Policy and Dispute Resolution Procedure v2 March 2023
- CEP. Energy Risk Management Policy v2 April 2023
- CEP. Energy Internal Audit Policy v2 March 2023
- CEP. Energy Obligations Register February 2023
- CEP. Energy Risk Register Matrix undated
- CEP. Energy Code of Conduct v2 April 2023
- CEP. Energy HR Policy v2 March 2023
- CEP. Energy Customer Hardship Policy v2 April 2023
- CEP. Energy Summary of Rights and Obligations
- CEP. Energy website notices
- CEP. Energy Privacy Policy v2 March 2023

2.2 Structure of the Report

This report provides evaluation of current processes and system against standard and AER requirements. Areas of effectiveness and deficiency in the arrangements have been highlighted with recommendations for improvement.

Further details are outlined in **Section 4**.

3 Key Recommendations

A summary of the key recommendations are as follows:

Element 1 – Compliance

1. Update the Risk Management Policy to note that compliance risks will be documented in the CEP. Energy risk register.

Further detail on findings and recommendations for improvement is outlined in **Section 4** below.

CEP. Energy responded to all audit findings on 16th May 2023 with evidence provided such that recommendations can now be closed out.

4 Audit Exception Report – Risk and Compliance

Requirement	Key Findings/Issues	Recommendations for Improvement
Element 1 – Compliance		
<p>1.1 Demonstrate 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 there is intention to operate.</p>	<p>The Compliance Policy references ISO 37301:2021 and clearly outlines processes for maintaining legal compliance and identifying legal requirements. Applicable legal requirements are identified in section 2.3 of the Compliance Policy. The Compliance Reporting Procedure also outlines various legal compliance obligations for reporting to the AER.</p> <p>The CEP. Energy Obligations Register dated February 2023 lists current legislation and various compliance requirements.</p>	<ul style="list-style-type: none"> • Nil
<p>1.2 Outline how applicable retailer authorisation obligations and statutory, industry and technical requirements will be met (including mechanisms to self-identify compliance breaches, reporting the breach and corrective actions).</p>	<p>The Compliance Policy outlines that the Compliance Committee will oversee and gather any information regarding compliance breaches. This policy also outlines other mechanisms to meet requirements including compliance personnel, software systems, and obligations register.</p> <p>The Compliance Reporting Procedure outlines the monitoring and reporting of compliance breaches using Potential Breach Notification Form Schedule A (of the Retail Compliance Reporting Procedure).</p>	<ul style="list-style-type: none"> • Nil.

Requirement	Key Findings/Issues	Recommendations for Improvement
<p>1.3 Effective system in place to review compliance policies, systems and procedures to ensure they are effectively monitoring compliance with the Retail Law and Rules</p>	<p>The Compliance Policy states Compliance obligations are reviewed by the Compliance Manager ongoingly. CEP Energy will procure at three-yearly intervals a third-party audit of its compliance policy and CMS and conduct annual reviews of its legislative compliance.</p> <p>There are a number of monitoring activities described including subscription feeds, data analysis, performance against key indicators, completed training and regulator contact.</p> <p>Internal audits are also described to occur at a minimum annually (Internal Audit policy).</p>	<ul style="list-style-type: none"> • Nil
<p>1.4 Clear responsibility levels and communication protocols for compliance within the business</p>	<p>The Compliance Policy states that the Board has overall responsibility for setting and overseeing the corporate governance and compliance standards.</p> <p>It states the Compliance Committee will be responsible for overseeing implementation of the compliance program. A Compliance Manager will assist the Committee and each Business Unit Manager also has compliance responsibilities.</p>	<ul style="list-style-type: none"> • Nil

Requirement	Key Findings/Issues	Recommendations for Improvement
<p>1.5 Processes are in place for the management of third party compliance with Retail law and Rules including the identification and rectification of breaches.</p>	<p>Third party compliance measures are included in the Third-Party Management Policy. CEP. Energy has implemented a third-party risk management process (the process) which follows the Risk Management Life Cycle.</p> <p>This document highlights that the Compliance Manager will compile a List of Compliance Obligations, which are relevant to each type of third-party vendor services contracted. This list will be provided to the Third-Party Vendor at the time of entering into the contract and their acknowledgement of these recorded. The Compliance Manager is responsible for ongoing monitoring of the performance of third-party vendors in relation to compliance breaches and to conduct spot audits to ensure adherence to compliance policies.</p>	<ul style="list-style-type: none"> • Nil
<p>1.6 A compliance risk assessment report is available</p>	<p>The Compliance Policy describes that compliance risk assessments will be conducted and risks are documented in the CEP.Energy Risk Register</p> <p>The Risk Management Policy outlines that these will be documented in a 'regulatory risk assessment report'.</p> <p>A risk register (undated) including compliance related risks was provided.</p>	<ol style="list-style-type: none"> 1. Update the Risk Management Policy to note that compliance risks will be documented in the CEP. Energy risk register. <p>Response: Risk Management Policy verified to have been updated to reflect risk register requirements.</p>
<p>1.7 Provide Potential Breach Notification template</p>	<p>A Breach Notification Report template was provided.</p>	<ul style="list-style-type: none"> • Nil.

Requirement	Key Findings/Issues	Recommendations for Improvement
<p>1.8 Demonstrate 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 processes). The organisation has an effective induction and training program.</p>	<p>The Compliance Policy states they 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.</p> <p>Performance reviews are mandatory and training and development of staff will be identified in terms of compliance requirements.</p> <p>The HR Policy outlines induction and training performance management requirements.</p> <p>Training is noted to include internal on-the-job training, written instructions such as standard operating procedures, coaching, external training and courses</p>	<ul style="list-style-type: none"> • Nil.
<p>Element 2 - Customer Management Complaint Resolution</p>		
<p>2.1 Complaint and dispute resolution procedures, developed in accordance with Australian Standard AS/ISO 10002-2014 (Customer satisfaction—Guidelines for complaints handling in organisations).</p>	<p>A Complaints Policy and Dispute Resolution Procedure has been developed which outlines CEP, energy’s commitment and process for acknowledging and resolving customer complaints.</p> <p>The procedure references the current Australian Standard <i>AS/NZS 10002:2022 Guidelines for Complaint Management in Organisations</i>.</p>	<ul style="list-style-type: none"> • Nil

Requirement	Key Findings/Issues	Recommendations for Improvement
<p>2.2 Requirements for complaint handling include the following:</p> <ul style="list-style-type: none"> • Provide information on how and where to complain. • Provide contact details, including a number for complaints and a website URL address to access documents setting out the process. • Ensure the complaint and dispute resolution procedure is easily accessible to all complainants and includes information about the process, timing and ways to make a complaint. • Provide special arrangement/support for complainants with specific needs. • Protect personal information unless consent has been provided. • Undertake reasonable efforts to investigate all the relevant circumstances. • Communicate the outcomes of your investigation and proposed outcomes as soon as practical. • Ensure contact details for energy ombudsman's contact details are clearly displayed on a bill. 	<p>The requirements for complaint handling are listed in the Complaints Policy and Dispute Procedure and the Customer Hardship Policy.</p> <p>Complaints management processes describe accessibility requirements and support for complainants with specific needs (i.e. interpreters, people with disabilities etc).</p> <p>Complaints procedures are stated to be made freely available through website and will be actively brought to the attention of customers.</p> <p>Energy Ombudsman details for Vic,NSW, SA and QLD are provided within the Complaints Procedure document.</p> <p>Hardship, summary of rights, privacy and no contact list etc are all included as website notices.</p>	<ul style="list-style-type: none"> • Nil
<p>2.3 Protection of communications, confidentiality of information, record keeping, and document retention practices are consistent with Telecommunications Act 1997 and Do Not Call Register Act 2006.</p>	<p>The Privacy Policy describes how CEP. Energy collects, uses, discloses, stores and processes data that is capable of identifying customers. Policy references applicable Privacy legislation.</p>	<ul style="list-style-type: none"> • Nil.
<p>2.5 Privacy Act 1988 is considered when dealing with customer details (document retention etc.).</p>	<p>As required the Customer Hardship Policy references Privacy Act and Policy.</p>	
<p>Element 3 – Risk Management</p>		
<p>3.1 Current risk management strategy is consistent with ISO31000: 2009 and covers operational and financial risks</p>	<p>The Retail Risk Management Policy is an overarching risk management framework document consistent with ISO31000: 2009. Compliance risks are included within the CEP. Risk Register</p>	<ul style="list-style-type: none"> • Nil

Requirement	Key Findings/Issues	Recommendations for Improvement
3.2 Risk and compliance documents are available to all staff	<p>Risk and compliance documents are available to all staff via CEP.'s internal system during onboarding.</p> <p>Training is provided in line with the requirements identified in the obligation register and compliance risk assessments.</p>	<ul style="list-style-type: none"> • Nil.
3.3 Example Risk Assessments	<p>CEP. Energy Risk Register was provided which included compliance and regulatory risks with relevant risk control review dates noted</p>	<ul style="list-style-type: none"> • Nil.

Compliance Policy

CEP.Energy Retail Compliance Policy

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1. Introduction

1.1. Businesses that aim to be successful in the long-term need to maintain a culture of integrity and compliance. Compliance is achieved by a systematic approach to the identification, management, and implementation of regulatory obligations supported by top level leadership.

1.2. This is the Compliance Policy of CEP.Energy Retail Pty Ltd (CEP.Energy) and it sets out the compliance management system ('CMS') that will be used by CEP.Energy to ensure compliance with all applicable legislation, regulations, licence conditions, codes, guidelines, rules, and standards that impact (or have the potential to impact) CEP.Energy's operations ('Regulatory Obligations').

1.3. CEP.Energy is committed to an effective compliance management system designed in accordance with Compliance Standard 37301:2021 (Compliance Management Systems).

1.4. CEP Energy's CMS is modelled on the following schematic:

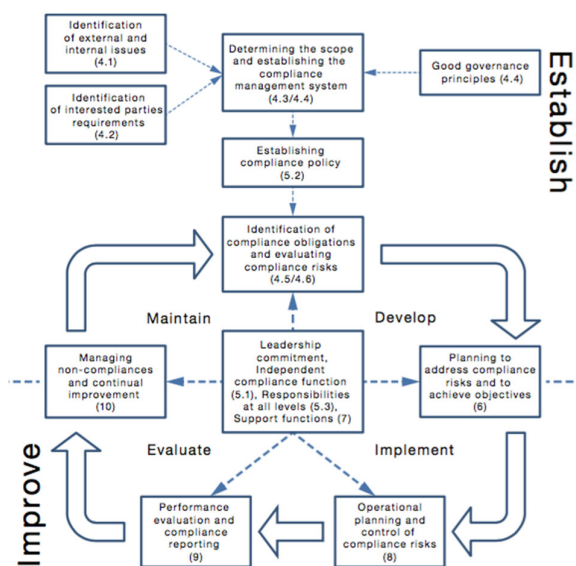


Figure 1 — Flowchart of a compliance management system

1.5.

1.6. 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 Regulatory Obligations that impact, or have the potential to impact, CEP Energy's operations.
- 2.3. CEP Energy's obligations include those under Energy Law (such as the National Energy Retail Law, the National Energy Retail Regulations, and state derogations), Network Exemption Guideline, Energy Retail Code of Practice (Vic) General Exemption Order 2022 (Vic), 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 CEP Energy's compliance philosophy, which is embedded in the CMS through its practices, operational policies, programs, and processes. In their entirety, they demonstrate CEP Energy's commitment to regulatory compliance, a robust risk management approach, central to its zero appetite for regulatory & compliance risk.
- 3.2. CEP Energy'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, to be formed by the Board, will 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.
- 4.3. The Compliance Committee will include a member of the CEP Energy Board, and the Compliance Director - as well as members of the Executive Management Team and Senior Advisors as required.
- 4.4. The Board member is responsible for reporting Compliance Committee decisions and minutes of meetings directly to the Board.
- 4.5. The Compliance Committee is responsible for:
 - 4.5.1. Developing and implementing the CMS through the creation and operationalisation of policies, procedures, and training programs;
 - 4.5.2. Identifying new regulatory obligations and changes to existing regulatory obligations, along with ensuring that CEP Energy, through its employees and contractors, complies with these obligations;
 - 4.5.3. Gathering information to investigate and resolve potential compliance breaches.
 - 4.5.4. Reporting potential compliance breaches to the compliance committee, Board, the Australian Energy Regulator ('AER') and the Essential Services Commission of Victoria ('ESCV'), in accordance with CEP Energy's CMS;
 - 4.5.5. Reviewing, overseeing, and enforcing the CMS via auditing, monitoring, and training;
 - 4.5.6. Directing the Compliance Manager to conduct compliance risk assessments as required, including audits, reviews, and remediation.
- 4.6. The Board owns this Compliance Policy and the CMS developed and implemented by the Compliance Committee.
- 4.7. The Compliance Manager assists the Compliance Committee in identifying compliance risks and implementing appropriate controls.
- 4.8. 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 trained in procedures.
- 4.9. The applicable BMs for the purpose of this policy include:
 - Head of Finance & Analytics
 - Energy Markets Director
 - Chief Development Officer
 - Delivery Partner & Embedded Network Director

- Operations Manager

5. Commitment to Compliance

- 5.1. CEP Energy'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. CEP Energy 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. CEP Energy has a sharp focus on compliance and risk-assessment. This, together with its commitment to excellence, is what distinguishes CEP Energy in the industry.
- 5.6. CEP Energy 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, CEP Energy will provide adequate resources which will be allocated as the need arises.
- 6.2. Resources currently used by CEP Energy 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:
- 7.2. 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 CEP Energy business;
- 7.3. Training;
- 7.4. Creating and updating policies, standards, procedures, and processes to ensure continued compliance with Applicable Law and best practice;
- 7.5. Engaging external consultants for advice or review where necessary;
- 7.6. Reviewing marketing material, contracts, and other documentation; and
- 7.7. Planning compliance presentations to be included at Management meetings or Board meetings, as appropriate.

8. External Consultants

- 8.1. As part of its CMS, CEP Energy regularly obtains advice on compliance and legal issues from various external consultants including law firms, financial advisors, and compliance professionals.
- 8.2. In addition, CEP Energy 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 CEP Energy's compliance policy, CMS, and compliance training program.

9. Software

- 9.1. CEP Energy's software systems have been developed with regulatory compliance and organisational effect as core requirements.
- 9.2. CEP Energy's billing system will issue invoices and apply payments in accordance with relevant regulations.
- 9.3. CEP Energy utilises compliance software developed to manage compliance. This includes the following software developed by Compliance Quarter:
 - Compliance HUB (online [here](#))
 - Risk Assessment Tool (online [here](#))
 - Regulatory Controls Map (online [here](#));
 - Regulatory Reporting Tool (online [here](#))

10. Documentation

- 10.1. CEP Energy 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. CEP Energy'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, CEP Energy will circulate the new document to all staff together with training where necessary.

11. Obligations Register

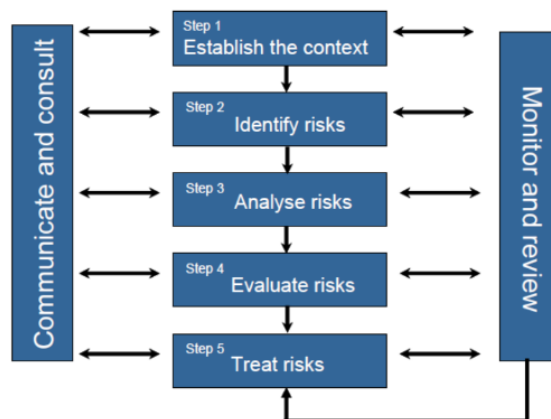
- 11.1. Relevant Australian Standards state an organisation should systematically identify its compliance obligations and the implications for its activities, products, and services. The extent to which an organisation documents its compliance obligations should be appropriate to its size, complexity, structure, and operations.
- 11.2. The Obligations Register employed by CEP Energy is the Obligations Register Application (ORA) developed by Compliance Quarter. The ORA is an online tool that allows the business to quickly identify applicable regulatory obligations. The ORA is available [here](#).

- 11.3. CEP Energy operates in a highly regulated environment. The Compliance Manager is responsible for identifying all relevant compliance obligations and publishing them in the Obligations Register.
- 11.4. The Obligations Register will be updated on the basis of changes to laws and other compliance obligations. This will be achieved by:
- 11.4.1. being on the mailing list of relevant regulators;
 - 11.4.2. maintaining membership of industry bodies;
 - 11.4.3. subscribing to relevant information services;
 - 11.4.4. attending industry forums and seminars;
 - 11.4.5. monitoring the website of regulators; and
 - 11.4.6. monitoring proposed regulation and decisions of courts and tribunals.

12. Compliance Risk Assessment

- 12.1. Risk assessments are conducted in accordance with the relevant Australian standards using the following methodology: Identification, analysis, and evaluation of compliance risks.
- 12.2. Compliance risks will be reassessed whenever there are:
- 12.3. New or changed activities, products, or services;
 - 12.4. Material changes to the structure or strategy of CEP Energy;
 - 12.5. Significant external changes, such as to financial-economic circumstances, market conditions, liabilities, and client relationships;
 - 12.6. Changes to compliance obligations; and
 - 12.7. Non-compliance.
- 12.8. An overview of the risk assessment process is shown in Figure 2 below.
- 12.9. As the context is further defined, risks are identified, monitored, and controlled. Risk assessment is intended to be a process of continual improvement.

Figure 2: Risk Assessment Process



Source: Chartered Secretaries of Australia

- 12.10. As a function of the Compliance Manager's risk management role, regular updates are provided to the compliance committee and Board via Management.
- 12.11. A number of compliance risks cannot be controlled, including human error. Therefore, CEP Energy actively seeks to identify and reduce the likelihood of residual risks and monitor remaining risks.
- 12.12. Residual risks that are identified in the compliance risk assessment must be reported to Management and the Board, as appropriate.
- 12.13. Compliance risks are documented in the CEP.Energy Risk Register

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 CEP Energy'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. CEP.Energy 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's 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. CEP Energy will develop performance and compliance criteria based on the requirements and definitions provided by the regulators.
- 15.2. CEP Energy 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. CEP Energy 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 Regulatory Reporting Tool (online here) (see Schedule A for introductory email), and must provide a complete description of the breach, including suspected potential breaches, and any corrective action to date. Submissions using the Regulatory Reporting Tool must be actioned by the Compliance Manager.
- 15.6. CEP Energy 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, CEP Energy 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. Remedial Action and Controls

- 16.1. 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.
- 16.2. 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
- 16.3. 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 CEP Energy has the obligation for compliance, it assumes ultimate responsibility.
- 16.4. The Compliance Manager will review existing controls on an ongoing basis to ensure their continuing effectiveness and relevance.

17. Provision of Updates and Advice

- 17.1. 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.
- 17.2. Compliance obligations are reviewed on an ongoing basis. CEP Energy 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.
- 17.3. CEP Energy'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.

18. Review

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

19. Publication

- 19.1. This policy is not published and is available internally only.

Version Control

Version	Amendment	Author and date
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Version 1	Initial draft	Compliance Quarter on 25 May 2022
Version 2	Reviewed by CEP.Energy for accuracy in regards CEP's proposed compliance program Branded CEP	3 April 2023

Schedule A: Email to staff introducing the Regulatory Reporting Tool

Please find below a link to our online reporting tool. The purpose of the online reporting tool is to standardise the capture of reports of potential breaches of regulatory obligations.

As we have explained in prior updates, the regulatory enforcement powers of both the AER and ESC were increased over the past few years to include penalties of \$10 million, three times the benefit gained from a breach, or 10% of global annual turnover – whichever is greater.

It is imperative that energy retailers capture any potential regulatory non-compliances so that they may be reported in the accordance with the ESC and AER Compliance Reporting Guidelines. As you will recall, certain breaches must be reported within two business days of identification. A failure to report on a breach is a breach in and of itself.

Once a breach is reported using the tool, we will work with you to assess whether a report is required and to consider next steps.

All staff must report using the tool on any potential breaches. Submit a report [here](#).



Code of Ethics

The energy business
of tomorrow.

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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 CEP.Energy Retail Pty Ltd (CEP.Energy).
- 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 CEP.Energy.**

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. CEP.Energy 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	CLJ on 05/03/2023
Version 2	Reviewed and branded	MM on 18/04/2023



Residential Customer Hardship Policy

The energy business
of tomorrow.

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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, South Australian and Victoria 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; and
- 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; and
 - 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; and/or
 - 1.3.2. Someone who helps you manage your energy bills
- We need your permission to talk to your support person(s)

2. Our approach to Hardship

- 2.1. At CEP Energy Retail Pty Ltd (**CEP.Energy**) we support customers who are experiencing hardship. As electricity supply is an essential service, 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 sustainable payment plans framework 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. To support this effort, our customer service team have received and are required to attend refresher training courses in identifying, dealing with, and responding to queries about financial hardship. This training is regularly reviewed and updated to ensure it is still fit-for-purpose. This enables the team to engage in compassionate and non-judgemental conversations. We are committed to ensuring you have equitable access to all resources outlined in this policy.
- 2.4. We have systems in place to ensure that we meet our obligations with respect to customer hardship in:
- 2.4.1. The National Energy Retail Law
 - 2.4.2. National Energy Retail Rules
 - 2.4.3. The AER Customer Hardship Policy Guideline
 - 2.4.4. This Customer Hardship Policy

3. Hardship – CEP.Energy's commitment

- 3.1. In our dealings with you, the customer we will:
- 1.1.1. Be respectful, compassionate and treat your circumstances with sensitivity and respect for your privacy
 - 1.1.2. Take into account all of your circumstances which we are aware of, and, on that basis, act fairly and reasonably
 - 1.1.3. Inform you of your entitlements
 - 1.1.4. Maintain customer assistance programs, such as affordable payment plans in accordance with the AER Sustainable Payment Plans Framework

- 1.1.5. Provide information about assistance available, including when contacted by you. This information will be provided in a timely manner
- 1.1.6. Be transparent and accessible and communicate to you, financial counsellors, and community assistance agencies when necessary
- 1.1.7. Provide assistance as soon as practicable
- 1.1.8. Not disconnect your energy supply while you are actively participating in the hardship program
- 1.1.9. Not charge late payment fees, irrespective of jurisdiction, nor require security deposits
- 1.1.10. Not hassle you with reminder notices or threats of disconnection. We will monitor customers during their participation in our Hardship Program, with quarterly reviews of their payment plan to ensure they remain affordable
- 1.1.11. Provide you with an email copy of this policy (it is also available to be downloaded from our customer service website <http://www.energyintel.com.au>)

4. Hardship – Your commitment

- 4.1. To remain in the Hardship Program, you need to commit to:
 - 4.1.1. Staying in contact with CEP Energy via email or phone and advise us of any relevant change in financial circumstances as this may impact the ability to remain on the agreed payment plan
 - 4.1.2. Meet all agreed scheduled payments as outlined in the payment plan

5. Hardship – Your commitment

- 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. The key point is that if you are experiencing an inability to pay your CEP Energy bill for whatever reason, please email our customer support at support@energyintel.com.au or call us on 1300 277 233 so we can assess your suitability for participation in our Hardship Program or arrange a suitable payment plan. If email or calling us do not suit, more contact options are listed in section 9 below.

6. Joining the Hardship Program

- 6.1. We will tell you about our hardship program if:
 - 6.1.1. You tell us you are having trouble paying your bill.
 - 6.1.2. You are referred to our program by a financial counsellor or other community worker.
 - 6.1.3. We are concerned that you may be experiencing financial hardship.
- 6.2. We will recommend you speak to a staff member to help you join our hardship program if you have:
 - 6.2.1. A history of late payments.

- 6.2.2. Broken payment plans.
- 6.2.3. Requested payment extensions.
- 6.2.4. Received a disconnection warning notice; and
- 6.2.5. Been disconnected for non-payment.
- 6.3. We can also support you to join our hardship program if you tell us:
 - 6.3.1. You are eligible for a relief grant or other emergency assistance; and
 - 6.3.2. You have personal circumstances where hardship support may help.
 - 6.3.3. Please contact us so we can discuss your individual situation.
- 6.4. Our staff are specially trained to help you with hardship. Staff will:
 - 6.4.1. Ask you a few questions about your circumstances; and
 - 6.4.2. Work out if you can join the hardship program.
- 6.5. We will assess your application for hardship assistance by the end of the second business day after contacting us.
- 6.6. We will let you know if you are accepted into our hardship program within three business days from receipt of the application.
- 6.7. If you are accepted into our hardship program, we will:
 - 6.7.1. Tell you if you are on the right energy plan or if there is a better plan for you.
 - 6.7.2. Tell you about government concessions, relief schemes or energy rebates you may be able to receive.
 - 6.7.3. Give you ideas about how to reduce your energy use; and
 - 6.7.4. Talk to you about a payment amount that suits your circumstances.
- 6.8. We can send you a free copy of our hardship policy.

7. Eligibility for the Hardship Program

- 7.1. You will be eligible to receive the assistance offered in the CEP Energy hardship program if:
 - 7.1.1. You are willing to meet our payment obligations but are unable to do so and
 - 7.1.2. You are willing to work collaboratively with us to prevent further arrears, and
 - 7.1.3. You have not been previously removed from our hardship program due to failure to meet any of the conditions listed under section 7.0, Customer Commitments below.
- 7.2. If a customer can meet all three of these conditions, then they should contact us at our customer service website <http://www.energyintel.com.au> or call 1300 277 233 as soon as possible, sharing as much information about their payment difficulty circumstances as possible.
- 7.3. If a customer cannot meet any of these criteria, they should still contact us as above, though they may not be eligible to participate in CEP Energy's hardship program.
- 7.4. If a customer is ineligible for participation in CEP Energy's hardship program, CEP Energy will inform the customer of the reason(s) why they are not eligible.

8. Our programs and services

- 8.1. As a hardship customer, you can access a range of programs and services to help you, including:
 - 8.1.1. Flexible payment options
 - 8.1.2. Review of your tariff to determine if another one of our tariffs would be more appropriate
 - 8.1.3. Information about your energy use
 - 8.1.4. Energy audits. Where recommended in the outcome of an audit, we can support the replacement of an appliance at your premises
 - 8.1.5. Advice on concessions and other assistance that may be available to you.
- 8.2. More information on these options is provided
- 8.3. What we will do:
 - 8.3.1. We will consider your individual situation to find the right programs (e.g. concession programs) or services that meet your needs.

9. Payment options

- 9.1. What we will do
- 9.2. There are different payment options available to hardship customers:
 - 9.2.1. Payment plans
 - 9.2.2. Centrepay
- 9.3. In some cases, we may also consider partial debt waiver options or payment holidays.
- 9.4. When you are in our hardship program, we will offer you flexible payment options to suit your individual situation.
- 9.5. To make you payment plan, we will consider:
 - 9.5.1. How much you can pay.
 - 9.5.2. How much you owe; and
 - 9.5.3. How much energy we expect you will use in the next 12 months.
- 9.6. This will help us figure out a payment plan that is right for you.
- 9.7. We will offer a payment plan to suit your situation. This will include payments to cover:
 - 9.7.1. What you owe; and
 - 9.7.2. An amount to cover your energy use.
- 9.8. Once we agree to a payment plan, we will send you information including:
 - 9.8.1. Who you can contact for more help.
 - 9.8.2. How long the payment plan will go for.
 - 9.8.3. The amount you will pay each time.
 - 9.8.4. How many payments you need to make.
 - 9.8.5. When you need to make your payments (this is also called the frequency of the payments); and
 - 9.8.6. How we worked out your payments.

9.9. You can choose to use Centrepay if you are eligible.

9.9.1. 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.

9.10. 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.

9.11. Depending on the rules in our hardship policy, we may be able to remove some debt, fees, or charges you owe.

9.12. If you miss a payment, we will contact you to see if you need help. We will contact you by phone or email.

9.13. What you must do:

9.13.1. Tell us if your situation changes and you can no longer make the payments in your plan. We can then review your payment arrangements.

9.13.2. Tell us if your contact details change.

9.14. We may stop helping you if you:

9.14.1. Stop making payments under your plan; or

9.14.2. Do not tell us when your contact details change.

9.15. If you have had two payment plans cancelled in the last 12 months because you did not follow your plan:

9.15.1. We do not have to offer you another plan; and

9.15.2. We might disconnect your energy

10. Conclusion of Payment Plans

10.1. Successful completion:

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

10.2. Changing a Payment Plan:

10.2.1. 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.

10.3. Leaving a Payment Plan:

10.3.1. You can return to normal billing and collection processes if you complete the payment plan or pay any previous bill arrears

10.3.2. If you stop meeting your instalment payments CEP Energy will attempt to contact you by your preferred method (email, customer portal or phone) 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.

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

10.3.4. 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.

10.3.5. You may leave the hardship program by transferring to another retailer.

10.3.6. 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.

10.3.7. Disconnection and debt collection are CEP Energy's absolute last resort, and we will only consider these options after exhausting all other reasonable steps.

10.4. Re-Entry to the Hardship Program

10.4.1. We will assess your individual circumstances and eligibility if you have been removed from or choose to leave the hardship program, but then want to re-enter our hardship program. Where you have left the hardship program because of successful completion of a previous payment plan, then we can agree to a new plan using the process outlined within policy. If you have left the hardship program for other reasons, then those circumstances will be reassessed. It may be the case the original payment plan needs to be modified to better fit your circumstances.

11. Other supports to help you pay your energy bills

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

11.2. What we will do: 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 services

11.3. What you need to do

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

12. We can help you save energy

12.1. Using less energy can save you money

12.2. What we will do: 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.

12.3. Energy Efficiency

12.3.1. Most customers are unaware of simple things they can do around their home which can reduce energy consumption, thus saving them money.

12.3.2. To help customers better understand how their household appliances and energy usage affects their bills, we encourage them to contact our customer service team via email or request a call-back by phone. These websites also offer some good advice:

<http://yourenergysavings.gov.au>

<http://www.energyrating.gov.au>

<https://www.choice.com.au>

<https://www.moneysmart.gov.au>

12.4. Energy Audits

12.4.1. A customer can request an energy audit either by calling or CEP Energy. Once a customer has given consent, CEP Energy will perform a thorough initial investigation of the customer's consumption profile to determine whether an energy audit is required. If recommended, we can consider full or partial cover of the cost of such audits, depending on the customer's circumstances. Such an audit may be offered free of charge to the customer if there is high unexplained electricity and gas consumption within the household and the customer debt level is high

12.5. Electrical Appliance Replacement

12.5.1. Where a field audit recommends replacement of an appliance to reduce electricity and gas consumption, we can refer eligible customers experiencing payment difficulty to a panel of reputable electrical appliance retailers who are able to advise on an alternative suitable appliance.

13. We will work with you

13.1. If you have joined our hardship program, we will not:

13.1.1. Charge late payment fees

13.1.2. Require a security deposit

13.1.3. Make changes to your plan without your agreement. For example, we will not put you on a shortened collection cycle unless you agree first.

14. Further information about government concessions and rebates

14.1. 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.

14.2. If CEP Energy becomes 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.

14.2.1. New South Wales, visit www.energy.nsw.gov.au/energy-consumers/financial-assistance

14.2.2. Queensland, visit www.communities.qld.gov.au or call 13 74 68

14.2.3. South Australia, visit www.dcsi.sa.gov.au or call 1800 307 758

14.2.4. ACT, visit www.acat.act.gov.au

15. Further information about financial counselling and advice

15.1. CEP Energy encourages its customer within the hardship program to speak to accredited financial counsellors. This is a free service whereby the financial counsellor works with the customer to help them take control of their finances. To find a financial counsellor in your area please phone 1800 007 007 or visit <http://www.financialcounsellingaustralia.org.au>

15.2. 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/>

16. Further information about Centrepay

16.1. Hardship customers who receive Centrelink benefits or allowances are eligible to use Centrepay as a payment method. Centrepay is a free service allowing customers to set up and manage regular deductions from their Centrelink payment to help pay their energy bills. If not stated in their existing market contract, hardship customers who are eligible to use Centrepay will be allowed to use Centrepay as a payment method.

16.2. Further information can be obtained from Centrelink by phoning 1800 050 004 or visiting <http://www.humanservices.gov.au/customer/services/centrelink/centrepay>

17. Accessing the hardship policy

17.1. This policy is available on our customer service website <http://www.energyintel.com.au> and a link to this policy is included in the Hardship information pack. Upon request and at no charge, we can make this policy available to customers through your preferred method of receiving written communication. We are committed to helping customers keep their electricity and gas supply so we may update this policy in compliance with changes to legislation or industry best practice. If we do make changes, we will inform affected customers as soon as practicable by email.

18. Communicating about hardship

18.1. CEP Energy acknowledges that some of its customers may have particular challenges with aspects of its Hardship Policy or Hardship Program including:

- 18.1.1. English language challenges.
- 18.1.2. Lack of internet access/living in a remote area.
- 18.1.3. Disabilities.

18.2. Where a customer informs CEP Energy of such a challenge, or any other particular challenge, CEP Energy will ensure that customer has special support with respect to the Hardship Policy or Hardship Program including:

- 18.2.1. Referral to language services where available or appropriate.
- 18.2.2. Communicating via phone or post where necessary.
- 18.2.3. Referral to services that support customers with disabilities.

18.3. If a customer wishes someone to represent them in their engagement with CEP Energy, they may request this at any time and CEP Energy will send a consent form or phone the customer to ensure that this the customer consents.

18.4. Where a customer has elected a representative to act on their behalf, CEP Energy will engage with that representative as it would with the customer.

19. Contact us

19.1. If you are struggling to meet your payment obligations or wish to discuss forms of assistance that may be available to you, available to you, you may contact us at:

- 19.1.1. Email: support@energyintel.com.au
- 19.1.2. Our customer service website: <http://www.energyintel.com.au>
- 19.1.3. Call back request: 1300 277 233 business days between 9am and 5pm (AEST/AEDT)

19.2. If you require an interpreter, please call the Translating and Interpreting (TIS national) on 131 450 and ask them to call 1300 277 233. Or if required, please call 1300 277 233 via the National Relay Service on 133 677.

20. Complaints

20.1. The CEP Energy customer service team works with the customer to resolve complaints they may have. If a customer has a complaint, they can contact us by email our customer support team on support@energyintel.com.au, or by leaving a complaint using the online form available at <http://www.energyintel.com.au> Customers can also call 1300 277 233 to leave a complaint.

20.2. Further information about how we handle complaints can be found in CEP Energy's Complaints and Dispute Resolution Policy which can be downloaded from <http://www.energyintel.com.au>

20.3.As information about how we handle complaints can be found in CEP Energy’s Complaints and Dispute Resolution Policy which can be downloaded from <http://www.energyintel.com.au>

20.3.1. Queensland

Energy and Water Ombudsman Queensland (EWOQ) Telephone: 1800 662 837

Website: www.ewoq.com.au

20.3.2. New South Wales

Energy & Water Ombudsman NSW (EWON) Telephone: 1800 246 545

Website: www.ewon.com.au

20.3.3. Australian Capital Territory

ACT Civil and Administrative Tribunal (ACAT) Telephone: 02 6207 1740

Website: www.acat.act.gov.au

20.3.4. South Australia

Energy & Water Ombudsman SA (EWOSA) Telephone: 1800 665 565

Website: www.ewosa.com.au

20.3.5. Victoria

Energy & Water Ombudsman Victoria (EWOV) Telephone: 1800 500 509

Website: www.ewov.com.au

21. Privacy

21.1.CEP Energy is committed to respecting the privacy and protecting the personal information of our customers in accordance with the Privacy Act 1988 (Cth). The CEP Energy Privacy Policy can be found on our customer service website at <http://www.energyintel.com.au>

22. Review of the policy

22.1.This policy will be reviewed at least annually.

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	CLJ on 05/03/2023
Version 2	Reviewed and branded	MM on 18/04/2023

Complaints Policy and Dispute Resolution Procedure

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1. Introduction

- 1.1. CEP Energy Retail Pty Ltd (CEP.Energy) is an energy retailer operating in NSW, QLD, and SA. This document sets out our procedures for accepting, recording, and resolving complaints.
- 1.2. 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.

2. Definition of Complaint

- 2.1. 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.
- 2.2. 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.
- 2.3. 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
- 2.4. When a complaint relates to more than a single aspect of our services or products, a separate charge will be recorded for each aspect.

3. Complaints Management

- 3.1. The guiding principles for our complaints management program are contained in AS/NZS 10002:2022 (Guidelines for Complaint Management in Organisations).

4. Promoting our Complaints Management Program

- 4.1. We will publish this Standard Complaints and Dispute Resolution Procedure on our website, and it will be actively brought to the attention of customers.
- 4.2. 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.

5. Responsiveness

- 5.1. 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.
- 5.2. 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

6. Responsibilities

- 6.1. All of our staff must comply with this procedure as well as the Energy Retail Code of Practice, Retail Law and Retail Rules and any Guidelines or Procedures published by the Essential Services Commission (ESC) or Australian Energy Regulator (AER) or the Australian Energy Market Operator (AEMO), or relevant state regulators. Complaints can be made to any CEP Energy employee or contractor. That employee or contractor is then required to report any complaints received to the Customer Service Manager.
- 6.2. 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.
- 6.3. Top-level management of CEP Energy 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.

7. Recording Complaints

- 7.1. Complaints are recorded in our customer management system as soon as they are received.
- 7.2. Complaints and all relevant information will be recorded, and a unique identifier will be provided.
- 7.3. 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.

7.4. 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.

7.5. 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.

8. Monitoring and Improving

8.1. 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.

8.2. CEP Energy's board will direct top-level management to address systemic issues that are identified during a complaint process.:

9. A Customer's Right to Complain

9.1. 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.

10. Internal and External Escalation

10.1. 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.

10.2. 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.

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

11. Our Commitment to Customers

- 11.1. 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
- 11.2. 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.

12. Customer Read Estimates

- 12.1. 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.” To access details on how to read your meter and submit a read, click here [\[URL\]](#).
- 12.2. 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.
- 12.3. We will deal with complaints regarding customer read estimates in accordance with our standard complaints process, which is outlined in this procedure.

13. Contact Us to Lodge a Complaint

- 13.1. You may contact us at any time to lodge a complaint using the following contact details:
- Our contact details:
- Call us on 1300 277 233 on business days between 9 am to 5 pm (AEST/AEDT)
- Email us at support@energyintel.com.au
- Fax us on 03 8610 2046
- Write to us at Energy Intelligence, Level 2, 789 Toorak Road, Hawthorn East, VIC 3123
- Interpreter: 131 450 - For help using an interpreter, visit TIS.
- NRS: 133 677 - For help using this service, visit NRS

14. Contact details for the Energy Ombudsman Schemes

- 14.1. 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>

Energy and Water Ombudsman Victoria

Freecall: 1800 500 509

Translating and interpreting service (TIS):131 450

Online: <https://www.ewov.com.au/start-a-complaint>

Email: ewovinfo@ewov.com.au

Post: Reply Paid 469 Melbourne VIC 8060

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	CLJ on 05/03/2023
Version 2	Reviewed and branded	MM on 17/03/2023

Version 3	Minor amendment to reference state law adherence	LS on 20/06/2023
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Privacy Policy

CEP.Energy Privacy Policy

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1. General

- 1.1. CEP.Energy Retail Pty Ltd (21 658 178 404) ("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 1300 277 233.
- 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 respond 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 company 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 may automatically recognise and store the individual's "IP address" (e.g., 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 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.

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 do not 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.

- 3.4. 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 period 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 CEP.Energy 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 Contact details set out below). We will endeavour to send you a written response within ten 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.

CEP.Energy reserves the right to modify, alter or otherwise update this policy at any time.

Should CEP.Energy 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

Company Name: CEP.Energy

Telephone: +61 2 91670910

Email: info@cep.energy

Mailing address: Level 1, 274 Victoria Street,
Darlinghurst NSW 2010.

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	05/03/2023
Version 2	Review and CEP.Energy branding	Marjorie Maydwell 16/03/2023
Version 3	Removed references to club"	

Third Party Management Policy

CEP.Energy Third Party Management Policy

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1. Introduction

- 1.1 CEP.Energy Retail Pty Ltd (**CEP.Energy**) partners with commercial and industrial property owners to enter rooftop leases and fund, develop and operate clean energy and storage assets. CEP.Energy will accelerate Australia towards its renewable energy targets.
- 1.2 CEP.Energy relies on selected third parties in its business operations.
- 1.3 CEP.Energy wants to ensure that all third-party vendors engaged to provide services are aware of, and comply with, CEP.Energy's obligations.

2. Third party risk management plan

- 2.1 CEP.Energy has implemented a third-party risk management plan which is contained in Annexure A.
- 2.2 The purpose of the plan is to ensure that before entering a contract with a third-party vendor for the supply of services, a sufficient due diligence process has been undertaken.

3. Selection of third-party suppliers

- 3.1 CEP.Energy will engage with third parties from time to time for reasons including: to supplement its internal resourcing, to fill any gaps in existing capability, to leverage external experience.
- 3.2 In selecting third-parties, CEP.Energy will first identify the need and define it, then determine what attributes or experience is required from a third-party and then look for suitable third parties to fulfil the need identified.
- 3.3 In selecting third-parties, CEP.Energy will conduct due diligence as further described below.

4. Identification of compliance issues

- 4.1 All third-party vendors will be required to notify CEP.Energy's Compliance Manager of any compliance breaches which occur in the course of providing services.
- 4.2 The Compliance Manager will compile a List of Compliance Obligations which are relevant to each type of third-party vendor services contracted. This list will be provided to the Third-Party Vendor at the time of entering the contract.
- 4.3 The List of Compliance Obligations may be updated from time to time when regulatory or legislative changes occur.
- 4.4 All third-party vendors will be required to provide written acknowledgment of receipt whenever an amended List of Compliance Obligations is sent to them.
- 4.5 The Compliance Manager will keep a record of the various lists of Compliance Obligations and record the acknowledgments.

5. Notification of a compliance breach

- 5.1 Upon being notified of a compliance breach from a third-party vendor, the Compliance Manager will immediately assess whether the breach needs to be reported to a regulatory authority.
- 5.2 If the breach is of a type which must be reported, then the Compliance Manager will take all necessary steps to notify the regulatory authority.
- 5.3 The Compliance Manager will arrange a meeting of the Compliance Committee to consider the breach and what remedial action should be taken.
- 5.4 The Compliance Committee will prepare a report for the board which details the circumstances of the breach and what remedial steps are required. This may include seeking legal advice as to whether the third-party vendor contract should be terminated.
- 5.5 The Compliance Manager will present the report to the board and the board must agree to the action.
- 5.6 The board may agree with the proposed course of action or require an alternative course of action.

- 5.7 The Compliance Manager will be responsible for ensuring that the relevant course of action is undertaken.
- 5.8 The Compliance Manager will be responsible for reporting to the board the progress of the course of action and any further actions which may be required.

6. Review of third-party vendor procedures

- 6.1 If the compliance breach notified by the third-party vendor is of a serious nature, then the Compliance Manager will be responsible for ensuring that the relevant third-party vendor policies and procedures are updated or amended to ensure that the breach does not re-occur.
- 6.2 The Compliance Manager will be required to report to CEP.Energy's board that this process has been undertaken and when it is completed.

7. Ongoing monitoring

- 7.1 The Compliance Manager will be responsible for ongoing monitoring of the performance of third-party vendors in relation to compliance breaches.
- 7.2 From time to time the Compliance Manager will be required to conduct spot audits to ensure that the compliance policies are being adhered to.

8. Documentation and reporting

- 8.1 The Compliance Manager will be responsible for ensuring that there are documentary records of the compliance history of each third-party vendor.
- 8.2 The compliance history of each third-party vendor will be reviewed annually by the Compliance Manager and a report presented to CEP.Energy's board.

Annexure A

THIRD PARTY VENDOR MANAGEMENT PLAN

1. Third party risk management process

- 1.1. As part of its business CEP.Energy may, from time to time, engage third-party vendors to supply services.
- 1.2. CEP.Energy has implemented a third-party risk management process (the process) which follows the Risk Management Life Cycle contained in Figure 1.

Figure 1: Risk Management Life Cycle



1.3. The process is contained in this document and outlined in the following clauses.

2. Planning

2.1 Before entering into a third-party relationship, the senior management team will develop a plan to manage the relationship.

2.2 The plan will be commensurate with the level of risk and complexity of the third-party relationship.

2.3 The plan will consider the following:

- assessment of the inherent risk in the activity to be undertaken by the third-party.
- outline the strategic purposes (e.g., reduce costs, leverage specialised expertise or technology, augment resources, expand or enhance operations), legal and compliance aspects, and inherent risks associated with using third parties, and discuss how the arrangement aligns with CEP.Energy's overall strategic goals, objectives, and risk appetite.
- assess the complexity of the arrangement, such as the volume of activity, potential for subcontractors, the technology needed, and the likely degree of foreign-based third-party support.
- determine whether the potential financial benefits outweigh the estimated costs to control the risks (including estimated direct contractual costs and indirect costs to augment or alter CEP.Energy's processes, systems, or staffing to effectively manage the third-party relationship or adjust or terminate existing contracts).
- assess the nature of customer interaction with the third party and potential impact the relationship will have on CEP.Energy's customers—including access to or use of those customers' confidential information, joint marketing or franchising arrangements, and handling of customer complaints—and outline plans to manage these impacts.
- Assess the extent to which the activities are subject to specific laws and regulations (e.g., Privacy Act, Competition and Consumer Law, Do Not Call Register requirements, Retail Law, and Rules); and
- Detail how CEP.Energy will select, assess, and oversee the third party, including monitoring the third party's compliance with the contract.

2.4 The plan will be presented to and approved by CEP.Energy board.

3. Due diligence

3.1 Before entering into a third-party relationship, CEP.Energy will undertake due diligence to ensure that the third-party's systems and policies align with the obligations which apply to an authorised energy retailer under the Privacy Act, Competition and Consumer Law, Do Not Call Register requirements, Retail Law, and Rules.

3.2 The due diligence will consider the following aspects of the third-party business:

- that the strategies and goals of the third-party do not conflict with those of CEP.Energy.
- that all necessary licences have been obtained.
- that there is sufficient expertise, processes, and controls to enable CEP.Energy to remain compliant with Australian laws and regulations.

- conduct an ASIC and ACCC check to ensure the third-party is not in breach of any statutory obligations.
- conduct a search to ensure that the third-party is not subject to any financial distress, including having entered into a voluntary administration or having an outstanding statutory demand or winding up application on foot.
- evaluate the business experience and reputation of the third-party to ensure it has the experience and expertise to provide the service.
- evaluate the risk management and compliance policies in operation and ensure that they comply with all Australian laws and regulations. In particular, assess whether they comply with the obligations imposed on an authorised energy retailer. If they do not comply, assess whether the third-party is able and/or willing to amend their policies.
- evaluate the systems which are in place to protect the privacy of customers.
- review the technology and systems which will be used by the third-party to ensure that they are suitable for the functions which are to be undertaken by the third-party.
- evaluate the incident reporting processes in place and ensure that they are compliant with the requirements for notification under the National Energy Law and Rules. If they do not comply, assess whether the third-party is able and/or willing to amend their policies.
- evaluate the training programs which are in place and assess whether they can be adopted to incorporate necessary training which may be required under the Retail Law and Rules.
- assess whether the quote provide is in line with market rates; and
- ensure that the third-party has all necessary insurance policies in place.

4. Contract negotiations

4.1 Once a third-party has been selected and satisfactory due diligence has been conducted, the senior management team should negotiate a contract with the third-party.

4.2 The contract should address the following:

- nature and scope of the arrangement.
- regular compliance monitoring.
- performance measures or benchmarks.
- responsibilities for providing, receiving, and retaining information.
- responsibility for compliance with applicable laws and regulations.
- confidentiality.
- dispute resolution.
- limits on liability.
- default and termination.
- customer complaints and hardship policy.
- AER audits and provision of information.
- Duration; and
- fee for service.

4.3 The contract must be approved by CEP.Energy's board.

5. Ongoing monitoring

5.1 CEP.Energy will continue to monitor the provision of services by the third-party to ensure that it meets with the obligations contained in the Retail Law and Rules.

5.2 CEP.Energy will assign the role of monitoring the performance of the third-party to the Compliance Officer.

5.3 Any breach of the obligations by the third-party are to be immediately reported by the Compliance Officer to senior management.

6. Termination

- 6.1 CEP.Energy may terminate the contract with the third-party in accordance with the individual contract terms.
- 6.2 Prior to termination CEP.Energy will implement a plan to ensure a smooth transition of the services being undertaken by the third-party.
- 6.3 CEP.Energy may engage a new third-party to provide the services or determine to provide the service in-house.
- 6.4 In making this decision, senior management must ensure that customers' confidential information is protected at all times.

7. Documentation and reporting

- 7.1 CEP.Energy will document and report on its third-party risk management process and specific arrangements throughout their life cycle.
- 7.2 Proper documentation and reporting facilitates the accountability, monitoring, and risk management associated with third parties and typically includes:
 - a current inventory of all third-party relationships.
 - approved plans for the use of third-party relationships.
 - due diligence results, findings, and recommendations.
 - analysis of costs associated with each activity or third-party relationship, including any indirect costs assumed by the bank.
 - executed contracts.
 - regular risk management and performance reports required and received from the third party (e.g., audit reports, security reviews, and reports indicating compliance with service-level agreements).
 - regular reports to CEP.Energy's board and senior management on the results of internal control testing and ongoing monitoring of third parties involved in critical activities.
 - Regular reports to CEP.Energy's board and senior management on the results of independent reviews of CEP.Energy's overall risk management process.

Version Control

Version	Amendment	Author and date
Version 1	Initial draft	05/03/2023
Version 2	Review and branding CEP	27/03/2023



Family Violence Policy

The energy business
of tomorrow.

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Policy Statement

Our organisation recognises that family violence is a serious and widespread issue that affects the whole community. We are committed to providing customers affected by family violence with confidential support and flexible payment arrangements to help manage their needs.

Purpose

Our Family Violence Policy (Policy) seeks to empower customers to request assistance in managing any family violence-related issues, regardless of their financial capacity.

Defining Family Violence

We recognise that there are many forms of family violence. Our organisation defines family violence as behaviour that is physically or sexually, emotionally, psychologically, or economically abusive, threatening, coercive, or in any other way controls or dominates a family member and causes them to feel fear for their safety or wellbeing.

Scope

This policy applies to all residential and small business customers, as well as customers in embedded networks who are impacted by family violence.

Customer Rights

1. Receive support from our employees in a respectful and supportive manner.
2. Have your personal information handled securely, privately, and sensitively.
3. Choose a method of communication of your preference.
4. Access information about external family violence support services.
5. Appoint an authorised representative or a support person to act on your behalf.
6. Remove the joint account holders and, if needed, set up a new account in your name (if required).
7. Receive payment assistance support, including access to the assistance under our hardship policy.
8. Avoid the need to repeatedly disclose your circumstances and receive continuity of service.

Our organisation and staff responsibilities

1. Provide all staff with thorough training in awareness of family violence.
2. Manage all engagement with affected customers in a respectful, understanding, and sensitive manner.
3. Handle information pertaining to customers affected by family violence securely and confidentially.
4. Ensure that customer consent is obtained before disclosing their personal information to a third party (unless required under law).
5. Contact emergency services (police and/or ambulance) on request by the customer or if they believe further assistance is needed.
6. Discuss a safety plan with customers who have disclosed family violence to confirm and ensure the safety of the customer and their children.
7. Provide information regarding government support programs, including concessions and the availability of external family violence support services (see below)

Account Security

1. Our organisation takes our obligations regarding your 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>](#).
2. When you inform us that you are experiencing family violence, we will:
 - a. Provide you with support, such as flagging your account for family violence, to ensure that your information is only accessed by senior employees within our organisation.
 - b. Request you at the time of notification if you would like to set up a password or security questions to protect your account details and confidential information.
 - c. Send bills and other communications only via your new preferred method of communication.

3. Your personal information will be securely handled and will remain confidential. We will not disclose a customer's confidential information to any other person without your prior consent.

Debt Management

1. Our organisation recognises family violence as a potential cause of financial hardship or payment difficulty. We will consider each customer's individual circumstances to find a suitable solution specific to the customer's needs and offer support in accordance with our hardship policy [<link to the policy>](#).
2. 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. Restricting the collections cycle to ensure that your premise is not de-energized for an overdue bill.

Accessing Support

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.

Supporting Documentation

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.

External Support

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

Implementation and Review

This policy will be implemented immediately and will be reviewed every 2 years from the date of issue or as required under the regulatory requirements to ensure that it remains current and effective in addressing family violence.

Dissemination

This policy will be published on our website, and a free copy will be made available via your preferred method of communication when you inform us of your circumstances.

Contact us & Complaint Handling

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>.
2. We take all your concerns and complaints seriously and will handle them in accordance with our Complaints and Dispute Resolution Policy <include link>.
3. If you are not satisfied with the outcome of our investigation, you can also contact the state-specific Ombudsman for further assistance.
4. 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

External Support

1. We will advise you of external support services, including access to a free interpreter service. (see above)
2. We will also maintain a list of external support services that are published on our website (see below).
3. We will keep this information up to date, ensuring that customers affected by family violence can easily access this assistance.
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 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	PS 01/04/2023
Version 2	CEP Branded and reviewed	MM 01/05/2023

Financial Resources

Criteria 5

I, Peter Wright of [REDACTED], being Chief Executive Officer and Managing Director of CEP Energy Retail Pty Ltd, declare that CEP Energy Retail is a going concern and I am unaware of any factor that would impede CEP Energy Retail's ability to finance its energy retail activities under the authorisation for the next 12 months.

I declare these statements to be true

Sydney 1.6.23

Place and date

[REDACTED]
Signature

Retail Energy Application — Declaration Criteria 6

Financial Resources

Criteria 6

I, Rod Naismith of [REDACTED] being a Partner at BDO Services Pty Limited an independent accountant and tax agent of CEP Energy Retail Pty Ltd, declare that:

- An insolvency official has not been appointed in respect of CEP Energy Retail Pty Ltd or any property of CEP Energy Retail 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 CEP Energy Retail Pty Ltd.
- I am unaware of any other factor that would impede CEP Energy Retail Pty Ltd's ability to finance its energy retail activities under the authorisation.

I declare these statements to be true

Melbourne, 28 September 2023

Place and date

[REDACTED]

Signature

1 June 2023

Dear Sir/ Madam

Energy Retail Application: Declarations 1 - 5

Suitability

Criteria 1

I, Peter David Wright of [REDACTED], being Chief Executive Officer and Managing Director of CEP Energy Retail Pty Ltd, declare that, CEP Energy Retail's associates, any other business where CEP Energy Retail's officers have held an officer position and any other entity that exerts control over CEP Energy Retail 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 CEP Energy Retail or an associate of CEP Energy Retail, 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.

I declare these statements to be true

Sydney 1.6.23

Place and date

[REDACTED]

Signature

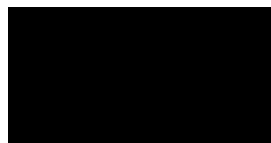
Suitability**Criteria 2**

I, Peter David Wright of [REDACTED], being Chief Executive Officer and Managing Director of CEP Energy Retail Pty Ltd, declare that CEP Energy Retail's current directors and any other person that exerts control over CEP Energy Retail's business activities, the persons with effective control of the business and all persons who are responsible for significant operating decisions for CEP Energy Retail 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 CEP Energy Retail's capacity as an energy retailer.

I declare this statement to be true

Sydney 1.6.23

Place and date



Signature

Suitability

Criteria 4

I, Peter David Wright of [REDACTED], being Chief Executive Officer of CEP Energy Retail Pty Ltd, declare that:

No member of CEP Energy Retail'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 CEP Energy Retail's management team.

I declare these statements to be true

Sydney 1.6.23

Place and date

[REDACTED]

Signature

Financial Resources

Criteria 5

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

I declare these statements to be true

Sydney 1.6.23

Place and date

[REDACTED]
Signature

Suitability

Criteria 2

I, Peter David Wright of [REDACTED], being Chief Executive Officer and Managing Director of CEP Energy Retail Pty Ltd, declare that CEP Energy Retail's current directors and any other person that exerts control over CEP Energy Retail's business activities, the persons with effective control of the business and all persons who are responsible for significant operating decisions for CEP Energy Retail 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 CEP Energy Retail's capacity as an energy retailer.

I declare this statement to be true

Sydney 1.6.23

Place and date

[REDACTED]

Signature

Suitability

Criteria 4

I, Peter David Wright of [REDACTED], being Chief Executive Officer of CEP Energy Retail Pty Ltd, declare that:

No member of CEP Energy Retail'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 CEP Energy Retail's management team.

I declare these statements to be true

Sydney 1.6.23

Place and date

[REDACTED]

Signature