



APPLICATION FOR AN ELECTRICITY RETAILER AUTHORISATION

PREPARED BY
Tas Gas Retail Pty Ltd

SUBMITTED
JULY 2023

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PART 1: INTRODUCTION

Tas Gas Retail Pty Ltd (ACN 110 370 726) (Tas Gas Retail) is Tasmania's leading natural gas retailer and provides retail services to over 8,500 Tasmanian customers. Tas Gas Retail also provides gas to 10 regional towns in Victoria.

Tas Gas Retail purchases and transports natural gas from Victoria to Tasmania and delivers it to points around Tasmania where Tas Gas Networks (ACN 104 499 569) takes carriage of it and delivers it through its network to Tas Gas Retail's customers.

Tas Gas Retail is driven by its customer's needs and supplies natural gas to residential, commercial and industrial customers; heating homes, providing instant hot water, helping to cook Australia's best food, and generating jobs for industry and businesses that use natural gas to meet their industrial and commercial heating needs.

Customer Focus

Tas Gas Retail's customer service team, based solely in Tasmania, is dedicated to supporting its customers and providing solutions that meet their needs. Tas Gas Retail prides itself on customer service and the role it plays in households and businesses to support the Tasmanian and regional Victorian lifestyle.

Tas Gas Retail's aim is to keep customers connected. For example, Tas Gas Retail offers customers standard and tailored payment options to assist with budgeting and to help avoid bill shock. Tas Gas Retail is dedicated to helping customers find the right solution for their individual situation.

Tas Gas Retail has been meeting the needs of Tasmanian residents and businesses for almost 20 years. Being based in Tasmania, Tas Gas Retail has a strong ethos of local employment and is a proud and active member of the Tasmanian community, through its sponsorship of the Tasmanian JackJumpers and Sally's Ride, and engagement with various Tasmanian charities including Dress for Success and the Vinnies Christmas Appeal.

Tas Gas Retail now seeks to leverage its expertise and services to expand into the electricity retail market in Tasmania.

This Application

This is an application by Tas Gas Retail for an electricity retailer authorisation in the jurisdictions in which the National Energy Customer Framework (NECF) applies.

Tas Gas Retail has held a Tasmanian Gas Retail Licence with the Office of the Tasmanian Economic Regulator (OTTER) since 21 August 2003. In addition, Tas Gas Retail obtained its Victorian Gas Retail Licence on 19 December 2016, which has expanded its retail operations to service customers in ten regional Victorian towns. The Australian Energy Regulator (AER) also approved Tas Gas Retail's application for a gas retail authorisation under the National Energy Retail Law (NERL) on 9 July 2019.

Whilst Tas Gas Retail's strategic direction has mainly focused on natural gas to date, it was formerly a retailer (2018-2020) to customers from several NECF jurisdictions who were on embedded gas, electricity or water networks owned and operated by former related entity, Enwave Australia Pty Ltd.

Becoming an authorised electricity retailer will provide Tas Gas Retail with the opportunity to offer Tasmanian customers a holistic retail experience so that their natural gas and electricity needs can be serviced by the one retailer. It will also offer Tasmanians more choice surrounding their electricity retailer in a market that has been dominated by the state-owned incumbent retailer.

PART 2: COMPANY BACKGROUND

2.1 The Tas Gas Group

Tas Gas Retail is a member of the Tas Gas Group. *Attached* as Attachment “A” is a detailed company structure.

Please note Attachment “A” is Commercial in Confidence.

The Tas Gas Group is Tasmania’s leading natural gas company with expertise in gas transmission, distribution and retailing.

With offices in Launceston and Hobart, and operations that span Tasmania and regional Victoria, the Tas Gas Group is driven by its customers’ current and future needs with a clear vision to support Australia’s transition to a cleaner energy future.

As part of its future energy pathway, the Tas Gas Group is exploring the possibilities that exist with hydrogen and other green gases. The Tas Gas Group works together with its communities so that it can continue to provide safe, reliable and continuous fuel for its customers.

In addition to Tas Gas Retail, the Tas Gas Group includes the below companies.

Tas Gas Networks

In Tasmania, Tas Gas Networks owns and operates one of the most modern gas networks in Australia, with over 837 kilometres of pipeline network delivering energy to customers in the form of natural gas that has safely and reliably provided heat for homes, businesses, and large industrial facilities across the State for the last 20 years.

Gas Pipeline Victoria

In Western Victoria, the Tas Gas Group owns and operates a 182-kilometre high-pressure transmission pipeline from Carisbrook to Horsham in south-west Victoria. This pipeline is integral to the supply of gas to the regional Victorian towns of Avoca, Ararat, Stawell and Horsham.

Gas Networks Victoria and Regional Energy Victoria

Gas Networks Victoria is the distribution network business distributing natural gas across 200 kilometres of its gas network to customers across 10 regional Victorian towns: Terang, Maldon, Marong, Heathcote, Robinvale, Swan Hill, Kerang, Nathalia, Orbost and Lakes Entrance. Regional Energy Victoria enables gas compression and high-pressure transportation to each of these regional towns to support the gas needs of residential, commercial and industrial customers in regional Victoria.

2.2 Tas Gas Group Ownership

Tas Gas Holdings Pty Ltd is owned by Infrastructure Specialist Management Limited (ACN 098 827 671), as trustee for the Energy Infrastructure Trust (EIT) and Infrastructure Capital Services Pty Ltd (ACN 608 017 303), as trustee for the Tas Gas Co-Investment Trust (Tas Gas Trust).



Tas Gas Retail is an indirect wholly owned subsidiary of Tas Gas Holdings Pty Ltd.

EIT and the Tas Gas Trust are managed by Foresight Group (www.foresightgroup.eu); a sustainability-led alternative assets and SME investment manager with over A\$22.8bn of assets under management across 9 countries.

Foresight Group's approach is to align its investment strategies with key themes shaping societies and the planet; creating a resilient decarbonised world and delivering jobs that will power the economy, whilst also delivering attractive, risk-adjusted and sustainable returns to investors.

In Australia, Foresight Group manages assets across a wide range of sectors, including transport, power and utilities and renewable energy. In electricity, Foresight Group operates in both the NEM and the WEM and is growing its portfolio of ~1.9GW of generation capacity.

PART 3: GENERAL PARTICULARS

| | |
|---|--|
| Fuel Type: | E |
| Existing or Start-up business: | Existing |
| Confidential Documents: | Yes |
| Legal Name: | Tas Gas Retail Pty Ltd |
| Trading Name: | Tas Gas Retail |
| ACN/ABN | 110 370 726/90 110 370 726 |
| Business/Correspondence Address: | 5 Kiln Court, St Leonards in Tasmania 7250 |
| Nominated Contact Person: | Ashley Peck, General Counsel and Company Secretary [REDACTED] |
| Proposed Date of Commencement: | January 2024 |
| Nature and Scope of Operations: | Initially, Tas Gas Retail proposes to retail electricity to Tasmanian residential and commercial customers on electricity networks owned and operated by Tas Networks. In the future, Tas Gas Retail intends to retail electricity to customers in NECF jurisdictions as the opportunity arises. |
| Jurisdictions: | All Australian States in which the NECF applies |
| Type of Customers: | Residential, small-medium businesses, commercial, industrial |

PART 4: ORGANISATIONAL AND TECHNICAL CAPACITY

4.1 Previous experience as an energy retailer

Natural Gas

Having existed as a licensed natural gas retailer in Tasmania since 2003 and regional Victoria since 2016, Tas Gas Retail has approximately 8,500 small retail customers and 40 large commercial and industrial customers.

As demonstrated by the CV's provided with this Application (see section 4.5 below), the broader Tas Gas Group team has extensive experience in the energy sector, including energy retail, as well as in corporate governance and financial management.

Based in Launceston, Tasmania, Tas Gas Retail has a dedicated customer service team responsible for the management of all customer activities from on-boarding, billing, account management and off-boarding. Tas Gas Retail also conducts its own marketing, sales and gas purchasing activities.

More broadly, Tas Gas Retail operates within a regulated environment across two jurisdictions. In both Tasmania and Victoria, Tas Gas Retail maintains compliance through ensuring customer complaints are handled appropriately, and has an established function for procuring and managing wholesale gas risk.

Tas Gas Retail has experience implementing the Victorian Energy Retail Code of Practice, which includes requirements relating to, *inter alia*, life support, financial hardship and family violence.

Electricity

The Tas Gas Group also developed and managed the Peel Microgrid located in Western Australia prior to its divestment in August 2022. The Peel Microgrid operations comprised:

- Generation and storage of energy through a solar PV array and battery;
- Ownership and management of the local distribution network (regulated by Energy Resources of Australia Ltd); and
- Retail of electricity to business customers located within the Peel business park.

4.2 Other relevant retail or energy market experience

The Tas Gas Group is already a trusted provider of gas-based energy services in Tasmania and Victoria and is dedicated to serving energy customers; looking into the future to anticipate their needs.

Through Tas Gas Networks and Gas Networks Victoria, the Tas Gas Group has experience managing highly regulated assets within the energy market. This means the Tas Gas Group already has a safety-first and compliance culture, constantly striving to employ its values of working together, doing what's right, giving it a go and staying safe.

Tas Gas Retail is self-sufficient in the management and delivery of its core retail functions and responsibilities. Tas Gas Retail's staff are multidisciplinary with each staff member trained to handle all aspects of customer service and billing. Tas Gas Retail directly employs 20 staff members, who deliver core

retail functions relating to compliance, risk management, customer service, billing, account management, complaint management, hardship management, marketing and gas and transport contract management.

Part of Tas Gas Retail’s growth as an electricity retail business will involve building the required capabilities into its existing business. Tas Gas Retail intends to build on existing core capabilities across people, process and technology in the areas of sales, customer service operations and wholesale trading. Tas Gas Retail may utilise specialist consultants and targeted recruitment of energy experience in roles as required.

In relation to its operations in regional Victoria, Tas Gas Retail’s multidisciplinary staff are also proficient at managing the onerous reporting obligations of the Essential Services Commission (ESC), which includes quarterly performance reports.

4.3 Organisation chart

Tas Gas Retail’s organisation chart is *attached* as Attachment “B”, which shows the existing retail team as well as new positions intended to recruit as the electricity retail business grows. The chart also shows elements of the Tas Gas Group, which Tas Gas Retail will utilise as shared capabilities. The chart may grow as Tas Gas Retail increases its resources in order to retail electricity.

4.4 Number of employees, broken down by capability

Through use of digital solutions and leveraging existing capability, Tas Gas will operate as a lean, streamlined company. Crucially, the capabilities and processes will be owned, not outsourced, and when operating at scale, Tas Gas will require approximately an additional 30.2 FTE.

Tas Gas Retail’s existing team comprises 15 FTE. These employees currently work in gas retailing, however ~5 have been hired to support the business growth aspirations and all existing team members will undergo training to work in gas and electricity prior to Day 1 of operations.

By Day 1, there will be an additional 6 FTE and at scale there will be a total 49.2 FTE.

All employees of Tas Gas Retail will be assigned to work in both gas and electricity.

This change is demonstrated in the table below:

| | Current TGR (Gas only) | By Elec Day 1 | At Scale |
|--|------------------------|---------------|----------|
| Strategy & Leadership | 1 | 1 | 1 |
| Sales, Product & proposition Development | 4 | 6 | 8 |
| Customer service & Operations | 7 | 7 | 20 |

| | | | |
|---|----|----|------|
| Billing, acct mgt & including metering operations | 4 | 4 | 11 |
| Support Services (*inc IT) | 0 | 3 | 3 |
| Wholesale Market Trading | 3 | 4 | 6.2 |
| Additional FTE | - | 6 | 30.2 |
| Total FTE | 19 | 25 | 49.2 |

Tas Gas Retail

Existing: 19

New Positions for Electricity Retail on Day 1: 6
New Positions for Electricity Retail at Scale: 30.2

Finance/IT

Existing/Shared: 14

New Positions for Electricity Retail: 2
New Positions for Electricity Retail at Scale: 2

General Counsel & Company Secretary

Existing/Shared: 2

Health Safety & Environment

Existing/Shared: 5

People & Culture/Shared Services

Existing/Shared: 6

These shared services are provided on a 'charge back' basis.

In addition to the existing 2 FTE within General Counsel & Company Secretary, there will be 1 Compliance & Risk FTE hired prior to Day 1 specifically to support electricity retailing.

4.5 Qualifications, technical skills and experience of Tas Gas Retail officers

Curriculum Vitae's for the Board of Directors (Board), the Tas Gas Group executive team and key office holders in Tas Gas Retail is *attached* as Attachment "C".

Please note Attachment "C" is Commercial in Confidence.

4.6 Third party controls

Whilst Tas Gas Retail does not propose to outsource any third-party controls, Tas Gas Retail will have access to third party resources as outlined below.

Existing retail operations

Tas Gas Retail has an existing retail business with core retail capabilities that can be leveraged from Day 1 to deliver an electricity product to the market, and these operational capabilities will be uplifted as required as the business grows.

Related entities

As a member of the Tas Gas Group, Tas Gas Retail will continue to have access to Tas Gas Group's established corporate support, namely human resources, finance, legal and compliance, risk management, and information technology.

Professional services

Tas Gas Retail will access professional services from time to time as required, for example marketing or external auditing services.

Financial audit

An external audit is not undertaken for Tas Gas Retail as a standalone entity. However, as Tas Gas Retail is a subsidiary of the Tas Gas Holdings Pty Ltd, and a member of the ASIC Deed of Cross Guarantee, it is covered under the external audit undertaken annually for the Tas Gas Group. PwC is the current auditor of the consolidated Tas Gas Group.

ISO Certification

The Tas Gas Group maintains an integrated HSEQ management system that is certified to ISO9001 (quality management systems), ISO14001 (environmental management systems) and ISO45001 (occupational health and safety management systems). This includes a triennial recertification assessment and annual certification maintenance audits that are undertaken by an independent certification auditor.

Relationships with Regulators

As Tas Gas Retail is currently a licensed retailer in Victoria and Tasmania, it has established relationships with the ESC and Energy Safe Victoria for its Victorian gas retail business, and OTTER and the Director of Gas Safety for its Tasmanian gas retail business, which include adhering to auditing and reporting requirements.

4.7 Business Plan including operating forecasts

Tas Gas Retail's business plan, including operating forecasts and stress test scenarios, is *attached* as Attachment "D".

Please note Attachment "D" is Commercial in Confidence.

4.8 Compliance strategy

As an experienced participant in the energy industry, the Tas Gas Group recognises the importance of clear compliance policies and processes and has experience operating a business with a strong focus on compliance.

Tas Gas Retail's proposed Compliance Plan for electricity retail in Tasmania is *attached* as Attachment "E".

Tas Gas Retail's Compliance Plan has been established in a manner that is consistent with AS/ISO 19600:2015. The objective of Tas Gas Retail's Compliance Plan is to ensure that the company adheres to the requirements of laws, industry and organisational standards and codes, the principles of good governance and accepted community and ethical standards.

Tas Gas Retail's directors and management team understand the importance of an effective compliance system. Tas Gas Retail has implemented a range of measures to ensure compliance with its regulatory obligations.

The directors and management team of Tas Gas Retail have overall responsibility for setting and overseeing the corporate governance and compliance standards that are to be implemented. Specific ways Tas Gas Retail will ensure compliance include:

- Qualified Staff: adopting a rigorous and detailed recruitment program to ensure appropriately qualified and suitable staff are employed.
- Training and Assessment: a program of training and assessment, including annual refresher training, with the aim of the building a culture of compliance and ensuring that all staff understand that regulatory compliance is core to Tas Gas Retail's operations. External training providers will be utilised where appropriate.
- Compliance Team: in accordance with AS/ISO 19600:2015, the Compliance Team is an independent Compliance Function responsible for developing and implementing a compliance program, and the day-to-day oversight of Tas Gas Retail's compliance. Tas Gas Retail's Legal Compliance Policy is *attached* as Attachment "F".
- External Advice & Audits: Tas Gas Retail, as part of its compliance program, obtains advice on compliance and legal issues from a number of qualified external providers, including law firms. Independent Auditors and the Tas Gas Group internal audit team regularly conduct audits on all aspects of the business.
- Information Technology: Tas Gas Retail uses a range of systems, including SharePoint, to assist in the company's compliance and implementation of the compliance program. These include the storage and maintenance of the comprehensive suite of centrally held compliance documents, document version control and retention, formal review and sign off procedures and an annual program of audit and inspections. The in-house IT Support team provide support and guidance on IT related issues and also manage the ongoing security of IT systems.
- Regular Reviews: Tas Gas Retail actively seeks to identify and reduce the likelihood of breaches of regulatory obligations. Regular reviews are conducted looking at applicable regulatory obligations, the consequences and likelihood of a breach and appropriate controls.

- Monitoring and Reporting: any compliance breaches are assessed, resolved and reported in accordance with Tas Gas Retail's reporting obligations.
- Complaints Handling: Tas Gas Retail treats any customer dissatisfaction with its services as a complaint and responds in a prompt, objective and empathetic manner in accordance with its Complaints and Dispute Resolution Policy and Procedure, which is *attached* as Attachment "G".
- Hardship Policy and Program: Tas Gas Retail recognises the benefits of assisting all its customers in effectively managing their energy bills and actively promoting assistance to any customer experiencing financial difficulty, whether it be in the short or long term. Tas Gas Retail offers the same service to any customer regardless of their personal or financial circumstances. This approach builds confidence and trust between Tas Gas Retail and its customers. Further, it enables both Tas Gas Retail and its customers to take early action to prevent long term and unmanageable debt. Tas Gas Retail has drafted its NERL Customer Hardship Policy as required by the NERL, which will be submitted to the AER for approval within 3 months of being granted a retailer authorisation, as required by s 43(2) of the NERL.

The Tas Gas Group's General Counsel oversees a program of internal and external audits and inspections to ensure ongoing compliance.

4.9 Risk management strategy

Tas Gas Retail is focussed on the long-term interests of its energy customers. In order to meet the interests of its customers, Tas Gas Retail has implemented a risk management strategy in accordance with the framework outlined in AS/NZS ISO 31000:2009. These objectives and organisational commitments are outlined in the Risk Management Policy, Risk Management Framework and Electricity Retailing Risk Register, *attached* as Attachments "H1", "H2" and "H3" respectively.

Please note Attachments "H2" and "H3" are Commercial in Confidence.

The risk management process is designed to consider risks across all fronts, including strategic, operational, safety, financial, environmental and reputational. Risks identified are mitigated as far as reasonably practicable and controls are tracked through internal risk treatment action plans. The organisations risks are regularly reported to the company's management and board and relevant persons are held accountable for ensuring the ongoing management of risks.

Internal audits of Tas Gas Retail's risk management strategy are undertaken in accordance with the company's audit schedule. Regular engagement in the risk management space occurs with the assistance and advice of external parties.

The Board of the Tas Gas Group (Board) has an Audit and Risk Management Committee (ARMC), which assists the Board in fulfilling its responsibilities to properly and effectively discharge their respective financial reporting, compliance with legal, safety, environmental and regulatory obligations, setting of risk frameworks, and appetite and oversight of the Tas Gas Group's system of internal control.

In fulfilling this purpose, the ARMC:

- Reviews and assesses the Tas Gas Group's processes, which assure the integrity of financial statements and reporting, and compliance with legal and regulatory requirements, including accounting standards;
- Reviews and assesses the appointment, qualifications, independence, performance and remuneration of the Tas Gas Group's appointed external auditors;
- Oversees the effectiveness of a system of internal controls and risk management framework;
- Oversees and reviews the work of the internal audit function; and
- Oversees the policies and procedures for ensuring the Tas Gas Group's compliance with relevant regulatory legal requirements (including health, safety and environment).

In terms of risk management, the ARMC is responsible for:

- Understanding risk tolerance and recommend an appropriate risk appetite to the Board;
- Assisting management to incorporate strategic risk thinking into strategy and recommend approval of the strategic plan to the Board;
- Overseeing the Risk Management Policy and Framework and review their suitability and effectiveness
- Reviewing the Tas Gas Group's key risks and controls, to ensure that they are adequately considered and compatible with the Tas Gas Group's objectives.

4.10 Wholesale price risk

Attached as Attachment "I" is a summary of Tas Gas Retail's approach to managing wholesale price risks.

Please note Attachment "I" is Commercial in Confidence.

4.11 Evidence risk management and compliance strategies have been subject to an external assurance process

Attached as Attachment "J" is a copy of external assurance received from Nine Lives Systems Pty Ltd.

Please note Attachment "J" is Commercial in Confidence.

4.12 Additional information demonstrating ability to manage risk and operate in accordance with the Retail Law objective

As Tasmania's leading natural gas retailer and distributor, the Tas Gas Group has a strong focus on running a compliance centric business, with the ability to train, monitor and report on compliance issues. Further, the Tas Gas Group has a particularly strong focus on risk, health and safety due to the nature of the assets its network businesses utilise, and the potential for safety issues relating to these assets if risk is not managed appropriately.

4.13 Membership of recognised energy industry ombudsman scheme in Tasmania

Tas Gas Retail is an established member of the Tasmanian Energy Ombudsman Scheme and Energy and Water Ombudsman of Victoria Scheme.

4.14 Agreements with key market players

Australian Energy Market Operator

Tas Gas Retail is a market participant with Australian Energy Market Operator (AEMO) for the purchase of gas for its Tasmanian customers and will take all necessary steps to fulfill AEMO's requirements to become a market participant for the purchase of electricity.

Following the preference outlined in correspondence with AEMO, Tas Gas Retail intends to lodge its application to become a market participant in the NEM once it receives its AER authorisation to retail electricity. This is because the authorisation is required as an attachment to the AEMO application.

Customers

Tas Gas Retail will provide standard retail offers to small retail customers. The terms and conditions will be consistent with the National Electricity Rules (NER). Contracts with large customers not covered by the NER will be substantially based on the NER rules but will be individually negotiated and subject to legal review by the Tas Gas Group's General Counsel.

Suppliers

Contracts with suppliers will be negotiated in accordance with the Tas Gas Group's standard procedure for engagement of third parties, including due diligence checks required by the Tas Gas Group, and will be subject to legal review and sign off by the Tas Gas Group's General Counsel.

These contracts will include:

- an agreement solely with Hydro Tasmania as the only supplier of energy contracts in Tasmania; these arrangements will be done under ISDA on agreed terms;
- a connection agreement with Tas Networks; and
- an agreement for the relevant meter data provider.

Further, the Tas Gas Group has the following policies and checklists to ensure robustness of its procurement processes:

- Purchasing Policy;
- Contractor and Supplier – Scoping, Evaluation and Engagement Checklist;
- Modern Slavery Policy;
- Modern Slavery Statement; and
- New Vendor Maintenance Form.

ASX Austraclear

The Tas Gas Group is already an Austraclear participant, and so Tas Gas Retail will use this participant licence for the electricity retail business.

Concessions

Tas Gas Retail recognises the importance of concessions for eligible customers. Tas Gas Retail is aware of and understands the Tasmania specific requirements relating to concessions under the *Electricity Supply*

Industry Act 1995 and *Electricity Supply Industry Concession Order 2016* and will proactively provide concessions to customers where eligible.

Clean Energy Regulator

Tas Gas Retail will register with the Clean Energy Regulator as a Liable Entity, which will give Tas Gas Retail the ability to receive Green Certificates from suppliers and surrender them annually as required.

4.15 Additional information

Additional contracts with technology service providers will be negotiated in accordance with established procurement policies and will be subject to legal review and sign off by the Tas Gas Group's General Counsel.

These contracts will support the following technology service categories:

- customer care and billing;
- print-house and digital communications;
- credit assessment;
- payment processing;
- project delivery;
- System integration;
- wholesale trading;
- cloud infrastructure; and
- enterprise Data Management.

Tas Gas Retail has a thorough understanding of the organisational and technical capabilities required to operate a retail business in a NERL regulated market.

PART 5: FINANCIAL RESOURCES

5.1 Financial reports

Tas Gas Retail has access to sufficient financial resources to ensure the success of its business.

A copy of the annual report for the Tas Gas Group for the year ending 30 June 2022 is *attached* as Attachment “K1”, which includes:

- financial statements – pages 6-9;
- notes to financial statements – page 10-27;
- Director’s Declaration – page 28; and
- auditor’s declaration of independence – page 5.

Please note Attachment “K1” is Commercial in Confidence.

A copy of the unaudited financial reports for Tas Gas Retail for the year ended 30 June 2022 is *attached* as Attachment “K2”.

Please note Attachment “K2” is Commercial in Confidence.

5.2 Credit rating

Tas Gas Retail does not have a credit rating, nor does the Tas Gas Group.

5.3 Group of related companies

Ownership Structure

Tas Gas Holdings Pty Ltd is the parent company of the Tas Gas Group. The entities within the Tas Gas Group are described in Section 2.1 (the Tas Gas Group) and Attachment “A”.

Tas Gas Holdings Pty Ltd is owned by Infrastructure Specialist Asset Management Limited (ACN 098 827 671), as trustee for the EIT and Infrastructure Capital Services Pty Ltd (ACN 608 017 303), AS TRUSTEE FOR THE Tas Gas Trust.

EIT and the Tas Gas Trust are managed by Foresight Group (www.foresightgroup.eu); a sustainability-led alternative assets and SME investment manager with approximately A\$22.8bn of assets under management across 9 countries.

The Tas Gas Group operates as a separate operation with its own management team and commercial relationships. The Board of Tas Gas Holdings Pty Ltd consists of 5 directors, which includes 2 independent non-executive directors.

Contractual arrangements that define relationships within the group

Tas Gas Retail is a member of the Tas Gas Group of companies. Whilst Tas Gas Retail is self-sustaining, money can be dispersed through an intercompany loan between members of the Tas Gas Group and Tas

Gas Retail, which includes provision for tax liabilities. Notes to this effect are included in the financial statements.

Tas Gas Retail also has access to the Tas Gas Group's external debt facilities, which include facilities for funding growth investments, working capital requirements and bank guarantees.

Furthermore, the Tas Gas Group and its subsidiaries are all members of an ASIC Deed of Cross Guarantee, which guarantees each entity's obligations.

5.4 Written declaration

A written letter from an independent auditor is *attached* as Attachment "L".

5.5 Details of Bank guarantees or arrangements

As a Tas Gas Group entity, Tas Gas Retail has access to a range of funding sources including:

- An external debt facility available for funding growth initiatives and capital expenditure;
- An external working capital facility available for funding working capital requirements and providing bank guarantees to counterparties; and
- A shareholder loan provided by the shareholders of Tas Gas Holdings Pty Ltd.

As noted above, Tas Gas Retail is also a member of an ASIC Deed of Cross Guarantee, whereby its obligations are guaranteed by the Tas Gas Group.

5.6 Forecast revenue and expenses for electricity retail business, and stress test scenarios

A copy of the financial model, including profit and loss, cash flow and balance sheet statements over a ten-year period presented in monthly increments for a baseline business case and stress test scenarios is *attached* as Attachment "M".

Please note Attachment "M" is Commercial in Confidence.

Extracts of the underlying assumptions and financial statements for the baseline business case and stress test scenarios over a three-year period have also been included in the Business Plan provided as Attachment "D".

PART 6: SUITABILITY

6.1 Fit and proper

Material failures

Other than as set out in Attachment "N", there have not been any material failures by any company within the Tas Gas Group or any of its related body corporates, officers or associates to comply with regulatory requirements, laws or other obligations over the previous 10 years, including infringement notices or other enforcement action (including voluntary administrative undertakings) being taken by a regulatory body.

Please refer to Attachment "N" for further information.

Please note Attachment "N" is Commercial in Confidence.

Previous revocations

There have not been any previously revoked authorisations, authorities or licences held in any industry by any company within the Tas Gas Group nor has there been any failed authorisation, authority or licence applications in any industry in respect of any group company.

Administrative or legal actions

There have been no past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry.

Retailer of last resort

There have been no situations where a Retailer of Last Resort has been triggered or was likely to have been triggered in respect of any companies within the Tas Gas Group of companies.

A written declaration from the Chief Financial Officer attesting to the above is *attached* as Attachment "O1".

6.2 Offences or prosecutions

There have been no offences or successful prosecutions 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)* or the *Corporations Act 2001 (Cth)*) relevant to Tas Gas Group's capacity as an energy retailer by any directors, any other person who exerts control over business activities; or any person who is responsible for significant operating decisions within the Tas Gas Group.

A written declaration from the Chief Financial Officer attesting to the above is *attached* as Attachment "O2".

6.3 Written declaration from Chief Financial Officer

A written declaration from the Chief Financial Officer that no members of the Tas Gas Group management team have been disqualified from the management of corporations, and that there is no record of bankruptcy within the Tas Gas Group management team, is *attached* as Attachment "O3".

6.4 Officer details

Full names and current residential addresses of all officers relevant to this application are *attached* in "Attachment P".

Please note Attachment "P" is Commercial in Confidence.

6.5 Policies and procedures addressing probity and competence

All Tas Gas Group employees are required to comply with the Code of Conduct Policy, Anti-bribery & Anti-corruption Policy, and Health and Safety Policy which are *attached* as Attachments "Q", "R" and "S" respectively.

6.6 Additional information

The Tas Gas Group employs approximately 100 people. Through its operations, the Tas Gas Group is committed to environmental, social and governance practices that have a positive impact on the communities in which it operates. These principles and associated practices ensure the Tas Gas Group manages its investments with integrity, balancing economic goals with good corporate citizenship, and include the following:

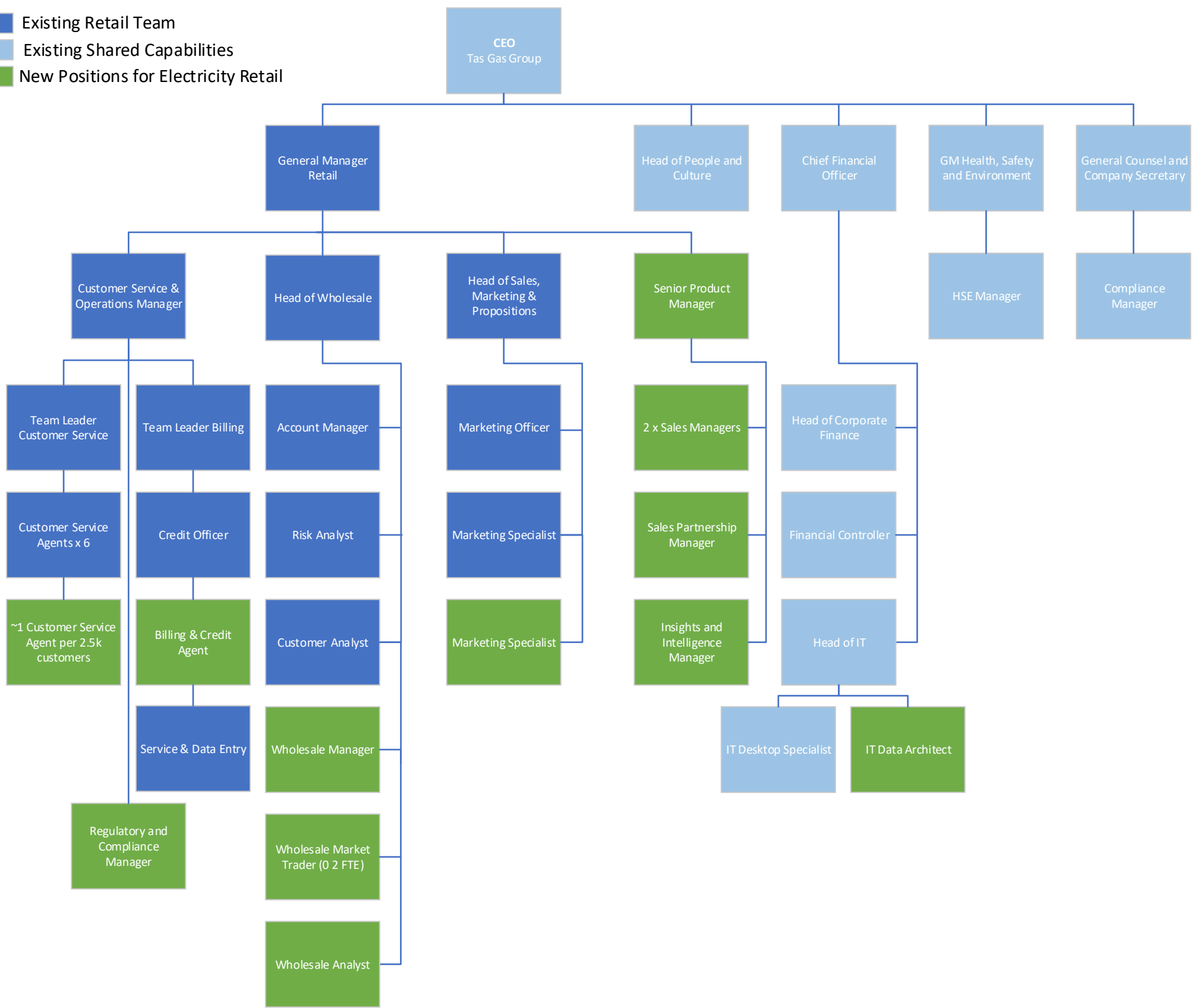
- ensuring the wellbeing and safety of its employees
- being good stewards in the communities in which it operates
- mitigating the impact of its operations on the environment
- conducting business according to the highest ethical and legal/regulatory standards

PART 7: ATTACHMENTS

| | |
|------|--|
| "A" | Detailed Company Structure |
| "B" | Organisation Chart |
| "C" | CV's |
| "D" | Business Plan including operating forecasts |
| "E" | Compliance Plan |
| "F" | Legal Compliance Policy |
| "G" | Complaints and Dispute Resolution Policy and Procedure |
| "H1" | Risk Management Policy |
| "H2" | Risk Management Framework |
| "H3" | Risk Register |
| "I" | Summary of Tas Gas Retail's approach to managing wholesale price risks |
| "J" | External assurance received from Nine Lives Systems Pty Ltd |
| "K1" | Annual Report for the Tas Gas Group |
| "K2" | Unaudited financial reports for Tas Gas Retail |
| "L" | Letter from PWC – 24 October 2022 |
| "M" | Forecast revenue and expenses, and stress test scenarios |
| "N" | Further Information – material failures |
| "O1" | Fit and Proper Declaration (Chief Financial Officer) |
| "O2" | Offences or Prosecutions Declaration (Chief Financial Officer) |
| "O3" | Disqualification and Bankruptcy Declaration (Chief Financial Officer) |
| "P" | Names and addresses of officers |
| "Q" | Code of Conduct Policy |
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| "AA" | Retail Training Matrix |
| "AB" | Training Calendar |
| "AC" | Customer Service Employee Compliance Training Checklist |
| "AD" | CSR Induction |
| "AE" | Compliance Manager Job Description April 2022 |
| "AF" | TGR Compliance Manager Job Description May 2023 |
| "AG" | CV |
| "AH" | Deed of Cross Guarantee |
| "AI" | Financial Statement – 31 December 2022 |
| "AJ" | Tas Gas Agent Letter |

"B" Organisation Chart - At Scale

- Existing Retail Team
- Existing Shared Capabilities
- New Positions for Electricity Retail



Compliance Plan TGR – Electricity (Tas)

13 December 2022

Version 2.0

| | |
|---------------------|---------------------------------------|
| Document Number | BMSDOC – 18 -2534 |
| Document Owner | General Counsel and Company Secretary |
| Due Date for Review | 1/12/2024 |

Department Review Required by:

- | | |
|---|---|
| <input type="checkbox"/> CEO | <input checked="" type="checkbox"/> Retail |
| <input type="checkbox"/> Finance | <input type="checkbox"/> People and Culture |
| <input type="checkbox"/> Engineering and Operations | <input type="checkbox"/> Commercial and Business Development |
| <input type="checkbox"/> Health, Safety and Environment | <input checked="" type="checkbox"/> General Counsel and Company Secretary |

Applicable to:

- | | |
|--|--|
| <input type="checkbox"/> Tas Gas Networks | <input type="checkbox"/> Gas Networks Victoria |
| <input type="checkbox"/> Tas Gas Holdings | <input type="checkbox"/> Gas Pipeline Victoria |
| <input checked="" type="checkbox"/> Tas Gas Retail | |

Document Acceptance and Release Notice

| Name, Title | Date |
|---|------------------|
| Prepared by: Georgia Newland, Compliance Manager | December 2022 |
| Accepted by: Ashley Peck, General Counsel and Company Secretary | 13 December 2022 |

Version History

| Version No. | Version Date | Description of Change |
|-------------|------------------|-----------------------|
| 1.0 | December 2022 | New document. |
| 2.0 | 13 December 2022 | Endorsement by Board. |

References

Cited in this Document

| Title | Document Number |
|--|--|
| Australian Energy Regulator (AER) Better Bills Guideline | AER |
| AER Compliance Procedures and Guidelines | AER |
| AER (Retail Law) Performance Reporting Procedures and Guidelines | AER |
| AER Retail Pricing Information Guidelines | AER |
| AS ISO 10002:2018 Customer satisfaction – Guidelines for complaints handling in organizations | Standards Australia |
| AS ISO 19600:2015 Compliance management systems – Guidelines | Standards Australia |
| Code of Conduct Policy | BMSDOC-18-378 |
| Complaints and Dispute Resolution Policy | BMSDOC-18-1912 |
| Complaints and Dispute Resolution Procedure (TGR) | BMSDOC-18-1350 |
| Complaints and Dispute Resolution Procedure Flow Chart | BMSDOC-18-1351 |
| Compliance Plan Policy | BMSDOC-18-844 |
| <i>Electricity Supply Industry Act 1995</i> | Tasmanian State Government |
| <i>Electricity Supply Industry Concession Order 2016</i> | Tasmanian State Government |
| Energy in Tasmania Performance Report, Office of the Economic Regulator | Office of the Tasmanian Energy Regulator (OTTER) |
| <i>Energy Ombudsman Act 1998</i> | Tasmanian State Government |
| NERL Customer Hardship Policy | TBC |
| <i>National Energy Retail Law as in force in Tasmania under the National Energy Retail Law (Tasmania) Act 2012</i> | Tasmanian State Government |
| <i>National Energy Retail Law (Tasmania) Regulations 2022</i> | Tasmanian State Government |
| National Energy Retail Rules | AEMC |
| Tas Gas Retail Pty Ltd – Electricity Retailer Authorization (pending) | AER |
| Whistleblower Policy | BMSDOC-18-737 |
| <i>Work Health and Safety Act 2012 (Tasmania)</i> | Tasmanian State Government |
| <i>Work Health and Safety Act Regulations 2012 (Tasmania)</i> | Tasmanian State Government |

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1. GENERAL

1.1 Scope

TGR retails natural gas and electricity to customers in Tasmania. This Compliance Plan is limited in scope to TGR’s electricity retail activities in Tasmania, and its compliance with legislation, regulations and codes as applicable in that jurisdiction. A separate Compliance Management System (CMS) has been developed for natural gas retail activities in Tasmania (and Victoria).

1.2 Objective

The objective of this plan is to document a Compliance Plan based upon the principles of good governance, proportionality, transparency, and sustainability in accordance with the requirements of the:

- *Electricity Supply Industry Act 1995 (Tas)*
- Electricity Supply Industry Concession Order 2016
- National Energy Retail Law as in force in Tasmania under the *National Energy Retail Law (Tasmania) Act 2012*
- *National Energy Retail Law (Tasmania) Regulations 2022*
- National Energy Retail Rules
- Australian Standard ISO 19600-2015 Compliance management systems – Guidelines

This document identifies TGR’s compliance obligations: the procedures, practices and strategies for managing and auditing TGR’s compliance; the roles and responsibilities of those persons responsible for ensuring compliance; activities conducted to monitor and audit ongoing compliance; key performance indicators that demonstrate compliance and improvement of business processes; and the identification of non-conformance(s), and corrective actions taken to eliminate a non-conformity, to prevent re-occurrence.

The aim is to provide a single document for reference when auditing performance of obligations and key performance indicators as defined within the applicable legislation.

1.3 Definitions

| Term | Description |
|----------------|---|
| Tas Gas | Tas Gas Holdings Pty Ltd includes, but is not limited to, the following subsidiaries: <ul style="list-style-type: none"> • Tas Gas Holdings Pty Ltd (TGH) • Gas Holdings Tasmania (GHT) • Tas Gas Networks Pty Ltd (TGN) • Tas Gas Retail Pty Ltd (TGR) • Regional Energy Victoria Pty Ltd (REV) • Gas Networks Victoria Pty Ltd (GNV) • Gas Pipeline Victoria PTY Ltd (GPV) |
| AEMC | Australian Energy Market Commission |
| AER | Australian Energy Regulator |
| HSE | Health, Safety and Environment |
| KPIs | Key Performance Indicators |
| MIRN | Meter Installation Registration Number |
| OHS | Occupational Health & Safety |
| OTTER | Office of the Tasmanian Economic Regulator |
| TGR | Tas Gas Retail |

1.4 Milestones

The following dates and actions are critical as part of ensuring compliance with this Compliance Plan.

Compliance Plan TGR – Electricity (Tas)

| Next due Date | Frequency | Action | Person Responsible for Compliance | Comments |
|---|---------------------------|--|-----------------------------------|---|
| Compliance Reporting (AER Compliance Procedures and Guidelines) | | | | |
| Within <u>two</u> business days after the breach has been identified | Immediate | Obligations requiring immediate notification to AER: <ul style="list-style-type: none"> - Retailer-initiated de-energisation of premises – small customers - Retailer obligations – life support equipment - Prepayment meters, life support equipment | GM Retail | Using AER pro-forma B.1 – immediate breaches and Compliance Reporting Template B.3 and emailed to AERCompliance@aer.gov.au |
| 31 October 28 Feb 30 April 31 August | Quarterly | Obligations reportable in quarterly reports to AER: <ul style="list-style-type: none"> - Retailer-initiated de-energisation of premises – small customers - Obligation on retailer to arrange re-energisation of premises - Explicit informed consent | GM Retail | Using AER pro-forma B.2 (even if nil returns) and Compliance Reporting Template B.3 and emailed to AERCompliance@aer.gov.au |
| 28 Feb 31 August | Half yearly | Obligations reportable in half yearly reports to AER: <ul style="list-style-type: none"> - Customer hardship - Payment plans - Energy marketing activities - Customer retail contracts – billing - Market retail contracts – requirements - Notice to small customers on deployment of new electricity meters - Retailer interruption to supply | GM Retail | Using AER pro-forma B.2 (even if nil returns) and Compliance Reporting Template B.3 and emailed to AERCompliance@aer.gov.au |
| Performance Reporting (AER (Retail Law) Performance Reporting Procedures and Guidelines) | | | | |
| 31 October 31 January 30 April 31 July | Quarterly and Half yearly | Performance Indicators reportable in reports to AER: <ul style="list-style-type: none"> - Retail market overview - Retail market activities: <ul style="list-style-type: none"> • Customer service and complaints • Handling customers experiencing payment difficulties • Pre-payment Meters • De-energisation (disconnection and re-energisation (reconnection)) • Concessions • Security deposits - Hardship Program | GM Retail | Using AER pro-forma A.1 generated using AER portal at portal.aer.gov.au |
| Retail Pricing (AER Retail Pricing Information Guidelines) | | | | |
| Within <u>two</u> business days of each energy plan becoming available | Immediate | Submit information at 4.7 to Energy Made Easy and ensure HTML link to the plan documents is live on TGR website | GM Retail | |
| Within <u>two</u> business | Immediate | Remove unavailable plan from Energy Made Easy and ensure | GM Retail | |

Compliance Plan TGR – Electricity (Tas)

| Next due Date | Frequency | Action | Person Responsible for Compliance | Comments |
|---|-----------|---|-----------------------------------|----------|
| days of each energy plan becoming unavailable | | HTML link to the plan documents is not long live on TGR website | | |

1.5 Company Activity

TGR will purchase wholesale electricity to sell to Tasmanian customers. The core outputs include:

- purchase of electricity and transmission services.
- electricity sales to customers covered by the National Energy Retail Law.
- customer relationship management including on-boarding and off-boarding; and
- billing, invoicing, and administration.

The following approvals are currently pending, and TGR cannot retail electricity until these are obtained:

- An electricity retail authorisation for TGR by the Australian Energy Regulator (AER)
- Registration as a Market Customer in the National Energy Market (NEM).

1.6 Key Personnel

The following personnel have a critical role to play in ensuring TGR's compliance obligations are met:

- Chief Executive Officer (CEO)
- General Manager Retail (GM Retail)
- Customer Service and Operations Manager
- Head of Wholesale
- Head of Marketing
- Market and Communications Coordinator
- General Manager Health, Safety and Environment (GM HSE)
- General Counsel and Company Secretary (General Counsel)
- Compliance Manager

Further details on these roles are set out in part 4.2 of this Compliance Plan.

2. COMPLIANCE OBLIGATIONS

2.1 Overview

Compliance with the National Energy Retail Law will be a condition of the electricity retail authorisation granted to TGR. The National Energy Retail Law requires TGR to establish arrangements to monitor compliance (section 273).

Section 273 of the National Energy Retail Law states:

Obligation of regulated entities to establish arrangements to monitor compliance

- (1) *A regulated entity must establish policies, systems, and procedures to enable it to efficiently and effectively monitor its compliance with the requirements of this Law, the National Regulations and the Rules.*
- (2) *The policies, systems and procedures must be established and observed in accordance with the relevant provisions of the AER Compliance Procedures and Guidelines.*

Compliance Plan TGR – Electricity (Tas)

This Compliance Plan is designed to align with the guidelines contained in AS ISO 19600:2015 Compliance management systems – Guidelines.

The Office of the Economic Regulator’s Report (OTTER) *Energy in Tasmania Performance Report 2020-21* states at clause 2.6:

Under the National Energy Retail Law 2011 (NERL), an entity must hold a retailer authorisation (unless exempt from the requirement) prior to engaging in the retail sale of electricity. From 1 July 2012, OTTER no longer issues licences to retailers intending to operate within mainland Tasmania, with the AER now responsible for the assessment and authorisation of retailers.

Authorised retailers are required to submit quarterly performance reports to the AER in accordance with section 282(1) of the NERL. The Tasmanian Economic Regulator has powers under the ESI Act to require retailers operating in Tasmania to provide information and these retailers must provide the Regulator with a copy of these reports after they are formally submitted to the AER. This information is used to monitor trends in the electricity retail market in Tasmania.

On 1 July 2014, full retail competition was introduced into mainland Tasmania, enabling retailers other than Aurora Energy to offer products to residential customers and to the balance of small business customers that were not opened to retail competition during 2011. Residential customers have faced a choice of retailers since early 2019.

This Compliance Plan relates to TGR’s compliance with electricity retail law and does not include compliance requirements such as those contained in the *Work Health and Safety Act 2012* (Tasmania) or the *Work Health and Safety Act Regulations 2012* (Tasmania).

2.2 Compliance Obligations

The below table sets out the various legislation and associated codes and regulations which, together with the electricity retail authorisation (when granted), form the compliance obligations.

Appendix B of this CMS sets out the compliance obligations in detail.

| Legislation/Code | Authority |
|--|----------------------------|
| AER Better Bills Guideline | AER |
| AER Compliance Procedures and Guidelines | AER |
| AER (Retail Law) Performance Reporting Procedures and Guidelines | AER |
| AER Retail Pricing Information Guidelines | AER |
| AS ISO 10002:2018 Customer satisfaction – Guidelines for complaints handling in organizations | Standards Australia |
| AS ISO 19600:2015 Compliance Management System – Guidelines | Standards Australia |
| <i>Electricity Supply Industry Act 1995</i> | Tasmanian State Government |
| <i>Electricity Supply Industry Concession Order 2016</i> | Tasmanian State Government |
| <i>Energy Ombudsman Act 1998</i> | Tasmanian State Government |
| <i>National Energy Retail Law as in force in Tasmania under the National Energy Retail Law (Tasmania) Act 2012</i> | Tasmanian State Government |
| <i>National Energy Retail Law (Tasmania) Regulations 2022</i> | Tasmanian State Government |
| National Energy Retail Rules | AEMC |
| Tas Gas Retail Pty Ltd – Electricity Retailer Authorization (pending) | AER |
| <i>Privacy Act 1988</i> | Australian Government |

Compliance Plan TGR – Electricity (Tas)

In addition, the following documents set out TGR’s obligations to customers and suppliers which may reference, or be relevant to, TGR’s compliance obligations:

| Document /Agreement | Originating Authority |
|-----------------------------------|--|
| Contracts with counterparties | Between TGR, relevant owners and or operators, wholesale electricity suppliers and on sellers of electricity, transmission and other associated services regarding electricity supply. |
| Long Form Use of System Agreement | Between TGR and Hydro Tasmania as the only supplier of energy contracts in Tasmania |
| Connection Agreement | Between TGR and Tas Networks |
| Metering Agreement | Between TGR and a relevant metering data provider |

3. COMPLIANCE PLAN

3.1 Commitment

This Compliance Plan is designed to demonstrate TGR’s commitment to and compliance with AS ISO 19600:2015 Compliance Management Systems – Guidelines.

3.2 Good Governance

TGR has a dedicated resource responsible for implementing the Compliance Plan within TGR, with this person reporting to the GM Retail. There is also a separate Compliance Function that is independent from TGR that reports directly to the CEO and Audit and Risk Management Committee (ARMC) on compliance matters.

3.2.1 Direct access to the governing bodies

In addition to the GM Retail’s relationship with external stakeholders and governing bodies, the Compliance Function also liaises with external stakeholders and governing bodies and arranges external audits on behalf of TGR.

3.2.2 Independence of the Compliance Function

The Compliance Function is independent from the TGR team and reports directly to the CEO. This independence enables the Compliance Function to provide an independent and unbiased view when assisting TGR to meet their compliance needs.

3.2.3 Appropriate Authority and Adequate Resources of the Compliance Function

The General Counsel operates at an executive level within TGR, reporting to the CEO and participating in the development and implementation of strategies and priorities for the business.

The Compliance Manager reports directly to the General Counsel and provides TGR with support to ensure compliance of relevant legislation, codes, and associated guidelines. This support includes ensuring policies, procedures and compliance plans are regularly reviewed and kept up to date, assisting with internal and external audits, and assisting in the compilation of regulatory reporting.

3.3 Compliance Obligations

Compliance obligations have been identified and are set out in Appendix B.

4. LEADERSHIP AND RESPONSIBILITY

4.1 Leadership and Commitment

The commitment of TGR, in respect to compliance, is outlined in the company’s Compliance Plan Policy (refer Appendix A).

Compliance Plan TGR – Electricity (Tas)

To achieve compliance TGR has developed strategies and procedures that are consistent with the National Energy Retail Law and Rules and regularly assesses compliance against key criteria.

TGR has developed standards and procedures to ensure that all activities are structured and monitored to ensure compliance and all staff are fully trained in those standards and procedures. These standards and procedures have been developed in compliance with the referenced documents.

4.2 Responsibility

The reporting structure is a clear line of sight through to the GM Retail and ultimately to the CEO. Accountability for operational, regulatory and compliance detail follows the same structure.

The CEO has a critical role in encouraging compliance and ensuring a culture of compliance throughout the organisation. The CEO has issued the Compliance Plan Policy (refer Appendix A) to which all employees are expected to comply. It is also the CEO's responsibility to ensure the GM Retail has direct access to them and the Board in relation to any compliance issues and concerns in the event they need to be escalated.

The GM Retail is responsible for the day to day running of the TGR team. Key responsibilities in relation to compliance include:

- providing clear, unambiguous support to the Compliance Plan Policy as set out by the CEO;
- having a detailed knowledge of the National Energy Retail Law, Rules and Regulations and applicable Australian Standards (e.g., AS ISO 10002:2018 Customer satisfaction – Guidelines for complaints handling in organizations and AS ISO 19600:2015 Compliance Management System – Guidelines);
- having an understanding and awareness of the *Energy Ombudsman Act 1998* and relevant AER Guidelines;
- working closely with the Customer Service and Operations Manager to ensure they have adequate resources and training to be able to supervise the Customer Service Team to provide services to customers in line with the company's compliance culture;
- ensuring the Marketing and Communications Coordinator has the resources and tools required to keep abreast with relevant legislation and codes in relation to marketing material (including the website);
- ensuring that the commitment to compliance is always upheld and that any failures or conduct that are prejudicial to the compliance culture are dealt with appropriately;
- ensuring that effective and timely reporting systems are in place;
- setting key performance indicators for measuring compliance;
- being readily available to deal with the escalation and resolution of any compliance issue;
- risk management monitoring and reporting;
- providing the AER and/or OTTER with any information requested by them or required under the legislation in a timely manner; and
- ensuring the electricity retail authorisation remains current.

The Customer Service and Operations Manager is responsible for providing support to the GM Retail in the day to day running of the TGR team. Key responsibilities in relation to compliance include:

- providing clear unambiguous support to the policy statement set out by the CEO;
- having an understanding of the National Energy Retail Law, Rules and Regulations and applicable Australian Standards (e.g., AS ISO 10002:2018 Customer satisfaction – Guidelines for complaints handling in organizations and AS ISO 19600:2015 Compliance Management System – Guidelines);
- supervising the Customer Service Team to provide services to customers in line with the company's compliance culture;
- ensuring the team receive adequate and on-going training and support in all areas of their role;

Compliance Plan TGR – Electricity (Tas)

- having an understanding and awareness of the *Energy Ombudsman Act 1998* and relevant AER Guidelines;
- ensuring that the commitment to compliance is always upheld and that any failures or conduct that are prejudicial to the compliance culture are dealt with appropriately;
- assisting in setting key performance indicators for measuring compliance;
- being readily available to deal with the escalation and resolution of any compliance issues;
- providing quality assurance checking and monitoring of the appropriate compilation of data for effective and timely reporting;
- assisting with internal auditing of processes to ensure ongoing compliance and continual improvement;
- assisting with the compilation and verification of information requested by the Regulator or required under the legislation in a timely manner;
- actively encouraging, mentoring, coaching and supervising staff to promote compliant behaviour;
- personally, complying and being seen to comply and follow operational procedures;
- being readily available to assist in the early resolution of any compliance issues;
- implementing ongoing processes and procedures to reduce the occurrence of compliance issues;
- being the conduit for escalation of non-compliance issues to the GM Retail and for feeding back to the team any improvements and modifications to compliance processes required by management; and
- carrying out the key responsibilities of the GM Retail in their absence.

The Head of Wholesale is responsible for:

- procurement of electricity.
- having a working knowledge of the National Energy Retail Law, Rules and Regulations and the compliance requirements of the electrical retail authorisation; and
- ensuring compliance with wholesale risk framework.

The Marketing and Communications Coordinator is responsible for:

- ensuring all marketing material, including the company website, is compliant with relevant legislation;
- having a working knowledge of the National Energy Retail Law, Rules and Regulations and the compliance requirements of the electrical retail authorisation; and
- having a knowledge and understanding of the laws relating to privacy, consumer law and fair trading.

Customer Service Employees have:

- an understanding and ability to comply with the company Code of Conduct Policy (*BMSDOC-18-378*) and any other internal codes and compliance procedures relevant to their role and necessary to ensure compliance;
- adequate training and support to be able to adhere to the compliance obligations contained in the the National Energy Retail Law, Rules, and Regulations; and
- an ability to follow clear processes in relation to security checking, disconnection and reconnection rules, payment plans, complaint handling, client billing and credit management.

Competence in these requirements varies according to tenure and it is the responsibility of the Customer Service and Operations Manager and senior Customer Service Employees to support and supervise less experienced team members. All staff are actively encouraged to seek the advice and support of more experienced team members if they have any concerns.

Compliance Plan TGR – Electricity (Tas)

All TGR staff have a duty to report and escalate compliance concerns, issues, and failures. Everyone has access to senior management and/or external means to report and escalate compliance concerns, issues and failures and are expected and encouraged to do so.

4.2.1 TGH Committees

The Compliance Function is responsible for providing the ARMC with regular reports on compliance activities, changes to obligations, audit findings and non-compliances across the TGH businesses, which includes TGR.

4.2.2 Operations

TGR will manage customer accounts for business customers and residential customers, collectively referred to as “small customers”, as defined by the National Energy Retail Law. Through managing these accounts, TGR will operate under its policies, procedures and checklists that have been developed in accordance with, *inter alia*, the National Energy Retail Law, Rules and Regulations and applicable Australian Standards.

4.2.3 Education

A staged training program is implemented to ensure all employees (new and existing) are competent to fulfil their evolving role while ensuring they are not overwhelmed with information overload. The program is designed to be consistent with TGR’s compliance culture and commitment to compliance.

The document that supports competency for new and existing team members for initial, ongoing and refresher training is titled the Customer Service Employee Compliance Training Checklist (*BMSDOC-18-1449*). This checklist is completed as each section of training is learnt and checked by the employee’s immediate manager.

4.2.4 Existing Employees

All permanent staff have a position description which incorporates compliance objectives. Staff development is progressed via individual development plans. The individual development plan includes training and development objectives that will assist the staff member to excel in their current role together with planning for skill development required for future career progression. Staff are actively performance managed as required.

TGR staff have an ongoing requirement to be adequately trained so they can easily and consistently apply compliance principles when handling customer and stakeholder queries and in doing so perform their duties in an ethical, lawful, and safe manner. They need to be fully aware of the broad principles of the National Energy Retail Law, Rules, and Regulations.

4.2.5 New Employees

All new employees go through a corporate induction process administered by Human Resources (HR). As part of the corporate induction process all new employees are provided with key policies and procedures which they need to read and acknowledge through a formal sign off process.

The training commences with initial on-boarding training and continues a regular basis, so the Customer Service Employee is confident and competent in all aspects of their role. Informal refresher training is conducted as required to ensure ongoing compliance and to cater for legislative changes or fill any identified gaps in staff knowledge.

The new employee will be required to complete training which when completed is signed off against the Customer Service Employee Compliance Training Checklist (*BMSDOC-18-1449*) saved electronically and a hard copy is stored with the employee’s records.

The Marketing and Communications Coordinator is expected to allocate time to read and research to ensure knowledge of the legislation relating to marketing material and the website. The GM Retail and General Counsel supports the Marketing Coordinator in this and ensures the resources and tools are available to do so. External resources are instructed to assist on an as required basis.

In addition to job specific training all TGR staff attend annual training sessions, organised by the HR team, on the Code of Conduct Policy (*BMSDOC-18-378*), bullying and harassment, ring fencing, emergency

management awareness and an induction refresher. Other ad-hoc training sessions are organised on an as required basis.

4.2.6 Visibility and Communication

TGR's commitment regarding safety, compliance, ethics, and other corporate policy statements are clearly visible in-house for personnel and the public to see.

The HSE team manage a controlled document store to which all TGR staff have access to read policies, programs, procedures, and guidelines.

Staff meetings are held fortnightly (however these may be deferred dependent on staff availability and competing priorities). These meetings provide all staff with an opportunity to raise issues including safety, risk identification/management, training, customer interaction and compliance. They also provide an opportunity for providing updates on regulatory and other changes affecting the electricity retail industry.

The HR team provide annual training and refresher courses for all staff together with regular updates and reminders in relation to compliance and performance.

4.2.7 Liaison

Effective stakeholder management through maintaining good working relationships with stakeholders, both regulatory and commercial, is a key area of responsibility for the GM Retail. TGR will work closely with these parties to ensure the Tasmanian electricity market is developed with foundations in the best possible policies, regulations, and relationships.

Regular, informal contact with the AER, OTTER, Australian Energy Market Operator (AEMO) and the Energy Ombudsman Tasmania (Ombudsman) is undertaken during compliance and reporting obligations.

TGR treats any queries or requests for information from the AER, OTTER, AEMO, Ombudsman or any other interested party as a priority and aims to respond within 1 business day. TGR ensures the AER, OTTER, AEMO and Ombudsman (as appropriate) receives up to date information.

4.2.8 Whistle-blower Policy

In further support of the Compliance Policy and this Compliance Plan, and in accordance with AS ISO 19600:2015 Compliance management systems – Guidelines, TGR has a Whistle-blower Policy (*BMSDOC-18-737*), which encourages staff to report a non-compliance issue.

A statement on the company's intranet advises employees faced with a situation which may be a violation of ethics or outside of the Code of Conduct Policy (*BMSDOC-18-378*) to raise the issue with their manager. If they are not comfortable with doing this, they are advised to contact the Whistle-blower Officer or Chairperson of the Tas Gas Holdings Board.

4.3 Performance Evaluation

4.3.1 Operational Processes

The Customer Service Employees record all contractual detail and summary notes of customer verbal communication and written correspondence electronically in the Gentrack Velocity customer management and billing system. The control processes within Gentrack Velocity provide sufficient detail for monitoring and assessment. Information is collected and held in accordance with the *Privacy Act 1988*.

4.3.2 Complaints

TGR treats a customer's expression of dissatisfaction with a specific action or service provided by TGR as a complaint.

Complaints are handled in accordance with the Complaints and Dispute Resolution Procedure (TGR) (*BMSDOC-18-1350*), which has been prepared in accordance with AS ISO 10002:2018 Customer satisfaction – Guidelines for complaints handling in organizations. This procedure is updated from time to time by the Customer Service and Operations Manager and a training update is provided as appropriate.

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The TGR Customer Service Team is responsible for entering all complaints and their progress into a Complaints Register which is stored in the Customer Services folder. The Customer Service and Operations Manager is responsible for overseeing entries made in the Complaints Register and ensuring complaints are handled in accordance with the Complaints and Dispute Resolution Procedure (TGR) (BMSDOC-18-1350).

In general, most complaints are resolved within 1 business day. The Complaints and Dispute Resolution Procedure (TGR) (BMSDOC-18-1350) sets a resolution target of 5 working days.

Serious complaints are escalated as soon as reasonably possible. A summary of complaints is reported to the executive management on a monthly basis.

All complaints are dealt with promptly and close supervision and monitoring is maintained until the complaint is resolved.

4.3.3 Customer Satisfaction

TGR carries out surveys to gauge customers views on the service provided and to obtain useful feedback on areas that could be improved.

4.3.4 Reports and Meetings

The TGR team meets regularly to discuss issues such as performance figures, staff training, staff health and safety, outstanding complaints, compliance breaches, and general concerns and issues. In addition, ad-hoc meetings may be arranged on an as required basis.

The GM Retail reports compliance activities informally to the CEO and General Counsel on an ad hoc basis. Any compliance breach issues, or serious complaints are reported as they occur, and the CEO escalates issues to the Board as and when required.

The Compliance Manager and Customer Service and Operations Manager have monthly meetings to discuss compliance matters and audits for TGR.

4.3.5 Phone System

TGR uses Ring Central Contact Centre as its phone system, which was implemented in October 2021. This phone system ensures every customer relates to the person best suited to resolving their issue.

4.3.6 Health, Safety & Environment Team

As part of the whole of organisation framework HSE provides TGR with advice and support in preparing documentation, ensuring compliance, and assessing risk. HSE reviews the Compliance Plan and makes recommendations as applicable.

4.3.7 Compliance Reporting

TGR prepares compliance reports in accordance with clause 1.4 above and puts these through to the HSE Manager and CEO for review before submitting them to the AER.

4.3.8 Internal Audits

On an annual basis the GM Retail and the Compliance Function will schedule two internal audits to be carried out over the following 12 months. These audits will target specific areas of TGR's business which have been identified either internally or externally as requiring inspection. The Compliance Function will carry out the audits and prepare a report for the GM Retail. The GM Retail will present the findings at the next staff meeting for discussion and record. The General Counsel will also report audit findings to the ARMC. Corrective actions such as training, improvements to procedures or changes to standard practices may be raised. An ongoing action may be recorded in meeting minutes to monitor the effectiveness of the corrective action.

4.3.9 Culture of Continuous Improvement

TGR has a set of core corporate values which encourage and support staff to actively seek ways to improve themselves and their work practices.

The core corporate values are:

Work together

- Have the conversation
- Share the load
- Show respect
- Listen and share ideas

Do what's right

- Act with integrity
- Take ownership
- Be transparent
- Work to a professional standard

Give it a go

- Challenge ourselves
- Support each other
- Learn from failure
- Own our decisions

“Safety by choice not by Chance”

- Be alert
- Take the initiative
- Look after each other
- Stay safe

The framework of the corporate values encourages an environment where doing the right thing is an imperative and this assists in building a culture of compliance through integrity and transparency. The values empower staff to take ownership for decisions but at the same time to learn from failure without blame which means any non-compliance or non-conformance can be dealt with in an open and transparent manner.

4.3.10 Key Performance Indicators

As part of TGR’s continual improvement process, certain key performance indicators (KPIs) are used to monitor and measure compliance performance. These indicators are reviewed regularly.

In addition, the AER Compliance Procedures and Guidelines requires TGR to provide certain information to the AER quarterly and half yearly.

The table below sets out the objectives of AS ISO 19600:2015 Compliance management systems – Guidelines together with KPIs and measurements for success.

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Objectives of AS ISO 19600:2015, KPIs and Measurements for Success

| AS ISO 19600:2015 Objective | Key Performance Indicator | Measures | Output |
|-----------------------------|--|---|--|
| Leadership | 1. Establish and uphold the Core Values of the Organisation | <ol style="list-style-type: none"> Company Values established. Demonstrate upholding the Core Values. | <p>Evidence of Company Values being established and reflected in company culture and in leadership decisions.</p> <p>Examples to include evidence of: publication of company values; company values action; support and encouragement by leadership of staff to uphold values.</p> |
| | 2. Ensure Compliance Policy and Compliance Objectives are established; integrated into business processes and effectively communicated to staff. | <ol style="list-style-type: none"> Compliance Policy established and published. Compliance Objectives established and clearly communicated. | <p>Evidence of ease of accessing policy and of awareness by staff of policy and its principles.</p> <p>Evidence of understanding by staff of the organisation's compliance objectives and their own responsibilities in relation to compliance.</p> |
| Planning | 3. Effective Risk Management | <ol style="list-style-type: none"> Processes in place are proportionate to the regulatory risk being managed Actions taken to prevent, detect and reduce undesired effects Risk based frameworks are published and available in a format that is clear, understandable, and accessible | <p>Demonstrate regular risk review and maintenance of a risk register</p> <p>Evidence of action taken to mitigate the risk of non-compliance appropriately</p> <p>Evidence of access and communication to staff of risk issues and their understanding of the risk issues.</p> |
| Support | 4. Provide resources required for the establishment, development, implementation, evaluation, maintenance, and continual improvement of the compliance management system | <p>Compliance function to provide support and</p> <p>Staff to research and keep up to date with compliance obligations</p> <p>Training on compliance obligations and best</p> | <p>Evidence of access to compliance function</p> <p>Evidence of research and reading carried out by staff</p> <p>Number, regularity, and nature of training events</p> <p>Evidence of membership of relevant industry and regulatory bodies and participation in training and workshop opportunities</p> |
| Operation | 5. Establish controls and procedures to ensure compliance obligations are met | <ol style="list-style-type: none"> Procedures and processes in place to ensure compliance Effective monitoring and controls | <p>Existence of standard procedures and work instructions</p> <p>Demonstrate staff understanding of procedures and work instructions</p> <p>Automated processes adopted where possible to eliminate errors or variation</p> |

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| AS ISO 19600:2015 Objective | Key Performance Indicator | Measures | Output |
|-------------------------------|---|--|---|
| | | | Evidence of internal audits and checks |
| Performance Evaluation | 6. Active monitoring, measurement, analysis, and evaluation of individual and team performance | <ol style="list-style-type: none"> 1. Performance management and assessment process in place 2. Monitoring and inspection approaches based on risk and where possible take into account the circumstance and operational needs of the business | Evidence that outcomes from performance evaluation measure the effectiveness of: <ul style="list-style-type: none"> • training. • controls. • allocation of responsibilities. • currency of compliance obligations; and • addressing previously identified failures. |
| Improvement | 7. React to non-conformities and non-compliances appropriately to take action to control and correct and/or manage consequences | <ol style="list-style-type: none"> 1. Clear and timely escalation process 2. Proper reporting process in place (both external and internal reporting) 3. Mechanism for employees to report misconduct or violations of the company's compliance obligations without fear of retaliation | Evidence of a documented and well understood escalation process Evidence of a clear and compliant reporting process Evidence of a confidential reporting process (for instance a whistle-blower policy and a confidential reporting phone line) |

APPENDIX A: COMPLIANCE PLAN POLICY STATEMENT



COMPLIANCE PLAN POLICY

Tas Gas Holdings Pty Ltd (Tas Gas) is committed to ensuring the safe, reliable and efficient operation of its business by:

- being fully compliant with all relevant legislation, regulations, licences and recognised industry standards and professional codes that govern its daily operations
- establishing and maintaining a comprehensive and effective compliance framework based on the best practice model and procedures set out in *AS ISO 19600:2015 Compliance management systems – Guidelines*.

To fulfil these commitments, Tas Gas will:

- maintain an organisational culture that supports compliance through strong leadership, participation, training and development
- ensure that employees are made aware of the compliance responsibilities that apply to their area of work or activities and ensure that their actions on behalf of the company comply with relevant laws
- provide effective integrity management of assets to ensure safety and maximise the life of the assets
- promote compliance by:
 - removing barriers to compliance and promoting the principles of the legislation
 - overcoming the factors that encourage non-compliance
 - raising awareness of the benefits of complying with the legislation and the potential consequences of not complying
- monitor compliance with relevant legislation, licences and codes through regular system audits to:
 - determine the level of compliance and trends for regulated activities
 - detect possible breaches and identify where action may be required to avoid or mitigate harm
 - identify whether, and what type of, education campaigns or enforcement action may be required
 - assess the effectiveness of its operations and programs, and identify opportunities for improvement.



Phaedra Deckart
Chief Executive Officer

Appendix B: Compliance Obligations by Legislation/Code

| Clause | Compliance Matter (Obligation) | Process to Achieve Compliance | Position Responsible for Compliance | Milestones/ Timeframes | Compliance Reported to | Process Reference |
|---|--|---|-------------------------------------|------------------------|------------------------|-------------------|
| 2.1 TGR Electricity Retail Authorisation (pending) | | | | | | |
| | TBC | TBC | GM Retail | Ongoing | CEO | |
| 2.2 National Energy Retail Law | | | | | | |
| Market retail contracts for small customers | | | | | | |
| s 37 | (1) A retailer must— (a) present its market offer prices (including any variation of those prices) in accordance with the AER Retail Pricing Information Guidelines; and (b) without limitation, present those prices in accordance with those guidelines when publishing, advertising or notifying the AER of those prices or any variation. (2) The retailer must present its market offer prices (including any variation of those prices) prominently on its website and in any other relevant material provided by the retailer in accordance with those guidelines. | Refer to the AER Retail Pricing Information Guidelines - Version 5.0 - April 2018.pdf at 2.7 below. | GM Retail | Ongoing | CEO | |
| Explicit informed consent | | | | | | |
| s 38(a) | A retailer must obtain the explicit informed consent of a small customer for the following transactions: (a) except as provided by sections 103(7), 105(8) and under Part 6, the transfer of the customer to the retailer from another retailer; | TGR must obtain customer's consent before transferring customer between retailers. | GM Retail | As required | CEO | |
| s 38(b) | A retailer must obtain the explicit informed consent of a small customer for the following transactions: (b) the entry by the customer into a market retail contract with the retailer; | TGR must obtain customer's consent before customer enters into market retail contract with TGR. | GM Retail | As required | CEO | |
| s 38(c) | A retailer must obtain the explicit informed consent of a small customer for the following transactions: (c) without limiting paragraph (b), the entry by the customer into a prepayment meter market retail contract with the retailer; | TGR must obtain customer's consent before customer enters into a prepayment meter market retail contract with TGR. | GM Retail | As required | CEO | |
| s 38(d) | A retailer must obtain the explicit informed consent of a small customer for the following transactions: (d) other transactions specified in this Law or the Rules as | TGR must obtain customer's consent before customer enters into other transactions specified under Law or Rules. | GM Retail | As required | CEO | |

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| Clause | Compliance Matter (Obligation) | Process to Achieve Compliance | Position Responsible for Compliance | Milestones/ Timeframes | Compliance Reported to | Process Reference |
|--------------------------|---|--|-------------------------------------|------------------------|------------------------|-------------------|
| | <i>requiring explicit informed consent.</i> | | | | | |
| s 40(1) | <i>Record of explicit informed consent (1) A retailer must— (a) create a record of each explicit informed consent required by this Division and provided by a small customer; and (b) retain the record for at least 2 years.</i> | TGR must create a record every time explicit informed consent is obtained from customer and keep record for 2 years. | GM Retail | As required | CEO | |
| s 40(2) | <i>Record of explicit informed consent (2) The record must be in such a format and include such information as will enable— (a) the AER to verify the retailer's compliance with the relevant requirements of this Part and the Rules relating to explicit informed consent; and (b) the retailer to answer enquiries from a small customer relating to the customer's explicit informed consent.</i> | TGR must ensure record of explicit informed consent adheres to these requirements. | GM Retail | As required | CEO | |
| s 40(3) | <i>Record of explicit informed consent (3) A retailer must, on request by a small customer and at no charge, provide the customer with access to a copy of the record of any explicit informed consent given by the customer and then retained by the retailer.</i> | TGR must provide customer with access to their record of explicit informed consent upon request. | GM Retail | As required | CEO | |
| Customer hardship | | | | | | |
| s 43(2)(c) | <i>Customer hardship policies (2) A retailer must— (c) maintain and implement the policy.</i> | TGR must maintain Customer Hardship Policy. | GM Retail | Ongoing | CEO | TBC |
| s 43(3)(b)(iv) | <i>Customer hardship policies (3) If, as a result of the exercise of the AER's functions and powers under section 204, the AER forms the view that a retailer's customer hardship policy requires review— (b) the retailer must— (iv) maintain and implement the policy.</i> | TGR must review Customer Hardship Policy at AER's request. | GM Retail | As required | CEO | TBC |
| Payment plans | | | | | | |
| s 50(1)(a) | <i>Payment plans (1) A retailer must offer and apply payment plans for— (a) hardship customers;</i> | TGR must make payment plans available to hardship customers. | GM Retail | As required | CEO | |
| s 50(1)(b) | <i>Payment plans (1) A retailer must offer and apply payment plans for— (b) other residential customers experiencing payment difficulties if the customer informs the retailer in writing or by telephone that the customer is experiencing payment difficulties or the retailer otherwise believes the customer is</i> | TGR must make payment plans available to customers experiencing payment difficulties. | GM Retail | As required | CEO | |

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| Clause | Compliance Matter (Obligation) | Process to Achieve Compliance | Position Responsible for Compliance | Milestones/ Timeframes | Compliance Reported to | Process Reference |
|--|---|--|-------------------------------------|------------------------|------------------------|-------------------|
| | <i>experiencing repeated difficulties in paying the customer's bill or requires payment assistance.</i> | | | | | |
| s 50(2) | <i>Payment plans (2) A retailer must comply with applicable requirements of the Rules relating to payment plans including how they are offered, but need not provide a payment plan in circumstances specified in the Rules.</i> | TGR does not need to provide payment plan unless the National Energy Retail Rules provide for particular circumstances. | GM Retail | As required | CEO | |
| s 51(a) | <i>Debt recovery A retailer must not commence proceedings for the recovery of a debt relating to the sale and supply of energy from a residential customer if— (a) the customer continues to adhere to the terms of a payment plan or other agreed payment arrangement;</i> | TGR cannot commence debt recovery proceedings if customer is adhering to payment plan. | GM Retail | Ongoing | CEO | |
| s 51(b)(i) | <i>Debt recovery A retailer must not commence proceedings for the recovery of a debt relating to the sale and supply of energy from a residential customer if— (b) the retailer has failed to comply with the requirements of— (i) its customer hardship policy in relation to that customer;</i> | TGR cannot commence debt recovery proceedings if doing so would breach Customer Hardship Policy. | GM Retail | Ongoing | CEO | TBC |
| s 51(b)(ii) | <i>Debt recovery A retailer must not commence proceedings for the recovery of a debt relating to the sale and supply of energy from a residential customer if— (b) the retailer has failed to comply with the requirements of— (ii) this Law and the Rules relating to non-payment of bills, payment plans and assistance to hardship customers or residential customers experiencing payment difficulties.</i> | TGR cannot commence debt recovery proceedings if doing so would breach the National Energy Retail Law or National Energy Retail Rules. | GM Retail | Ongoing | CEO | |
| Energy marketing activities | | | | | | |
| s 53(2) | <i>Energy Marketing Rules (2) A person who carries out energy marketing activities must comply with the Energy Marketing Rules.</i> | TGR must comply with the Energy Marketing Rules. | GM Retail | Ongoing | CEO | |
| 2.3 National Energy Retail Rules | | | | | | |
| Customer retail contracts – billing | | | | | | |
| Rule 21 | <u>Estimation as basis for bills (SRC and MRC)</u> <i>21 (1) A retailer may only base a small customer's bill on an estimation of the customer's consumption of energy where: (a) the customer consents to the use of estimation by the retailer; or (b) the retailer is not able to reasonably or reliably base the</i> | TGR can only base bill on estimate if customer consents, or TGR cannot base bill on meter read, or metering data is not provided. | GM Retail | Ongoing | CEO | |

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| Clause | Compliance Matter (Obligation) | Process to Achieve Compliance | Position Responsible for Compliance | Milestones/ Timeframes | Compliance Reported to | Process Reference |
|--------|--|--|-------------------------------------|------------------------|------------------------|-------------------|
| | <p><i>bill on an actual meter reading; or</i> <i>(c) metering data is not provided to the retailer by the responsible person or metering coordinator (as applicable)</i></p> <p><i>21 (2) Where estimations are permitted to be used as the basis for a small customer’s bill, the estimations must be based on:</i> <i>(a) the customer’s reading of the relevant meter (which may be a customer read estimate, as defined in subrule (3A)); or</i> <i>(b) historical metering data for the customer reasonably available to the retailer; or</i> <i>(c) the average usage of energy by a comparable customer over the corresponding period if there is no historical metering data for the customer.</i></p> <p><i>21 (3) The retailer must inform the small customer, on the bill, that the bill is based on an estimation, and (if applicable) that the estimation is based on the customer’s reading of the relevant meter under subrule (2)(a).</i></p> <p><i>21(3A) If:</i> <i>(a) a small customer receives a bill based on an estimate, other than a customer’s reading of the relevant meter; and</i> <i>(b) where the bill under paragraph (a) is for the supply of electricity, the consumption of electricity at the customer’s premises is not recorded by an interval meter, being a meter that records consumption derived from interval metering data, the small customer may request an adjusted bill based on the customer’s reading of the relevant meter (a customer read estimate) by providing the retailer with the customer read estimate before the due date for payment of the bill under paragraph (a).</i></p> <p><i>21(3B) On each occasion when the conditions in subrules (3A)(a) and, as applicable, (b) are met, the retailer must inform the small customer in writing:</i> <i>(a) that the customer may request an adjusted bill in accordance with subrule (3A); and</i> <i>(b) of any changes to the customer’s payment obligations if the customer makes such a request; and</i> <i>(c) how the customer can obtain the information under subrule (3C).</i></p> <p><i>21(3C) A retailer must make available to small customers at</i></p> | <p>Estimation must be based on customer read estimate, or historical data, or customer’s average usage.</p> <p>TGR must inform customer on bill that it is based on estimation, and on customer read estimate (if applicable).</p> <p>If bill is based on estimate (other than customer read estimate) and there is not an interval meter at the customer’s premises, customer may request an adjusted bill by providing TGR with their customer read estimate before the bill due date.</p> <p>TGR must inform customer they can request adjusted bill if s 21(3A) applies, and of any changes to their payment obligations if requested by customer, and of how customer can obtain information under s 21(3C).</p> <p>TGR must make this information available to customers at no</p> | | | | |

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| Clause | Compliance Matter (Obligation) | Process to Achieve Compliance | Position Responsible for Compliance | Milestones/ Timeframes | Compliance Reported to | Process Reference |
|--------|---|---|-------------------------------------|------------------------|------------------------|-------------------|
| | <p><i>no charge and in clear, simple and concise language for the purposes of subrule (3A):</i></p> <p><i>(a) guidance on how to read the customer’s meter; and</i> <i>(b) the types of information the customer is required to provide when lodging the customer read estimate; and</i> <i>(c) instructions on the methods by which the customer can lodge the customer read estimate.</i></p> <p><i>21(3D) Where:</i> <i>(a) a small customer requests an adjustment to a bill based on an estimate in the circumstances set out in subrule (3A) by providing the retailer with a customer read estimate; and</i> <i>(b) the retailer receives the customer read estimate before the due date for payment of the bill; and</i> <i>(c) the customer read estimate is provided in accordance with the guidance and requirements provided by the retailer under subrule (3C),</i> <i>the retailer must, promptly and at no extra charge, provide the small customer with an adjusted bill based on the customer read estimate.</i></p> <p><i>21(3E) If:</i> <i>(a) the customer read estimate was received on or after the due date for payment of the bill; or</i> <i>(b) the customer read estimate is not provided in accordance with the guidance and requirements provided by the retailer under subrule (3C),</i> <i>the retailer may reject the customer read estimate and, if it does so, must promptly notify the small customer in writing of the specific reasons for its decision.</i></p> <p><i>21(3F) The retailer must set out a process under its standard complaints and dispute resolution procedures for a small customer to attempt to rectify a customer read estimate that is not accepted under subrule (3E) (b).</i></p> <p><i>21(3G) If the retailer does not accept the customer read estimate under subrule (3E), the retailer must inform the small customer in the same notice required to be provided under that subrule, that the customer may:</i> <i>(a) lodge a dispute with the energy ombudsman where the customer is not satisfied with the retailer’s decision after the customer has followed the process under subrule (3F); and</i> <i>(b) separately, request the retailer to review the bill under rule</i></p> | <p>charge: guidance on how to read meter and information about lodging customer read estimate.</p> <p>TGR must provide customer with adjusted bill based on customer read estimate at no extra charge.</p> <p>TGR may reject customer read estimate if received on/after bill due date, or customer has failed to satisfy requirements in guidance/instructions provided under s 21(3C) and must notify customer in writing with reasons.</p> <p>TGR must set out a process for customer to rectify rejected customer read estimate.</p> <p>If TGR rejects customer read estimate, TGR must inform customer in notice under 21(3E) that they may lodge dispute with Ombudsman and request TGR to review bill.</p> | | | | |

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| Clause | Compliance Matter (Obligation) | Process to Achieve Compliance | Position Responsible for Compliance | Milestones/ Timeframes | Compliance Reported to | Process Reference |
|---------|--|--|-------------------------------------|------------------------|------------------------|-------------------|
| | <p>29.</p> <p>21(3H) <i>If under subrule (3B) (b) a retailer has advised a small customer of changes to the customer's payment obligations, and those changes include a new date for payment of the customer's bill, any benefits provided under the retailer's contract with the customer for payments made by the due date must be applied with respect to the new date for payment.</i></p> <p>21(4) <i>Without affecting rule 20 (2), if the retailer has issued the small customer with a bill based on an estimation and the retailer subsequently issues the customer with a bill that is based on an actual meter reading or on metering data:</i> <i>(a) the retailer must include an adjustment on the later bill to take account of any overcharging of the customer that has occurred; and</i> <i>(b) unless the actual meter reading or metering data could not be obtained as a result of an act or omission by the customer, the retailer must, if requested to do so by the customer, offer the customer time to pay any undercharged amount by agreed instalments, over a period being no longer than:</i> <i>(i) the period during which an actual meter reading or metering data was not obtained, where that period is less than 12 months; or</i> <i>(ii) in any other case, 12 months.</i></p> <p>21 (5) <i>Where an attempt to read the small customer's meter is unsuccessful due to an act or omission of the customer, and the customer subsequently requests a retailer to replace an estimated bill with a bill based on an actual meter reading, the retailer must comply with that request but may pass through to that small customer any costs it incurs in doing so."</i></p> | <p>If TGR has made changes to customer's payment obligations which include a new bill due date, any benefits for payments must be applied to the new bill due date.</p> <p>If estimation bill is overridden by meter read bill, TGR must include adjustment on meter read bill, and offer customer extra time to pay if requested (unless customer caused bill to be based on estimate).</p> <p>TGR may pass through costs it incurs for meter read to customer if customer caused bill to be based on estimate.</p> | | | | |
| Rule 24 | <p><u>Frequency of bills (SRC)</u></p> <p>24 (1) <i>A retailer must issue bills to a small customer at least once every 100 days.</i></p> <p>24 (2) <i>A retailer and a small customer may agree to a billing cycle with a regular recurrent period that differs from the retailer's usual recurrent period where the retailer obtains the explicit informed consent of the small customer.</i></p> | <p>TGR must issue bill once every 100 days (or more).</p> <p>TGR can change customer's recurrent period for billing cycle if customer consents.</p> | GM Retail | Once every 100 days | CEO | |
| Rule 25 | <p><u>Contents of bills (SRC and MRC)</u></p> | | GM Retail | Once every 100 | CEO | |

| Clause | Compliance Matter (Obligation) | Process to Achieve Compliance | Position Responsible for Compliance | Milestones/ Timeframes | Compliance Reported to | Process Reference |
|--------|--|--|-------------------------------------|------------------------|------------------------|-------------------|
| | <p>25 (1) A retailer must prepare a bill so that a small customer can easily verify that the bill conforms to their customer retail contract and must include the following particulars in a bill for a small customer:</p> <p>(a) the customer's name and account number. (b) the address of the customer's premises for the sale of energy and the customer's mailing address (if different); (c) the meter identifier. (d) the billing periods. (e) the pay-by-date for the bill and the bill issue date. (f) the total amount payable by the customer, including amounts of any arrears or credits. (g) tariffs and charges applicable to the customer. (h) the basis on which tariffs and charges are calculated. (i) whether the bill was issued because of a meter reading or an estimation and, if issued because of a meter reading, the date of the meter reading. (j) the values of meter readings (or, if applicable, estimations) at the start and end of the billing period. (k) particulars of the average daily consumption during the billing period. (l) if a bill was issued by the same retailer for the corresponding billing period during the previous year, particulars of the average daily consumption during that previous billing period. (m) the estimated date of the next scheduled meter reading (if applicable). (n) details of consumption or estimated consumption of energy. (o) for residential customers - energy consumption benchmarks in accordance with Part 11. (p) any amount deducted, credited, or received under a government funded energy charge rebate, concession, or relief scheme or under a payment plan. (q) if the customer has provided a security deposit, the amount of that deposit. (r) details of the available payment methods. (s) reference to the availability of government funded energy charge rebate, concession, or relief schemes. the following particulars in a bill for a small customer: (t) a telephone number for account enquiries, the charge for which is no more than the cost of a local call. (u) a telephone number for complaints (which may be the</p> | <p>Bill must include each of these requirements – refer to the AER - Better Bills Guideline - March 2022.pdf at 2.4 below.</p> | | <p>days</p> | | |

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| Clause | Compliance Matter (Obligation) | Process to Achieve Compliance | Position Responsible for Compliance | Milestones/ Timeframes | Compliance Reported to | Process Reference |
|---------|---|--|-------------------------------------|------------------------|------------------------|-------------------|
| | <p>same as that for account enquiries), the charge for which is no more than the cost of a local call.</p> <p>(v) a separate 24-hour telephone number for fault enquiries and emergencies, the charge for which is no more than the cost of a local call, being the telephone number for the distributor and giving the name of the distributor.</p> <p>(w) contact details of interpreter services in community languages.</p> <p>(x) any proportionate billing information in accordance with rule 22.</p> <p>25 (2) The retailer must include amounts billed for goods and services (other than the sale and supply of energy) in a separate bill or as a separate item in an energy bill.</p> | <p>Amounts billed for goods and services must be in separate bill or as a separate item in energy bill.</p> | | | | |
| Rule 26 | <p><u>Pay-by date (SRC)</u></p> <p>26 (1) The pay-by date for a bill must not be earlier than 13 business days from the bill issue date.</p> | <p>Bill due date must be 13 business days (or more) from bill issue date.</p> | GM Retail | Ongoing | CEO | |
| Rule 28 | <p><u>Historical billing information (SRC and MRC)</u></p> <p>28 (1) A retailer must promptly provide a small customer with historical billing data for that customer for the previous 2 years on request.</p> <p>28 (2) Historical billing data provided to the small customer for the previous 2 years must be provided without charge, but may be provided subject to a reasonable charge where the data requested is for an earlier period or has been requested more than:</p> <p>(a) four times in any 12-month period, in the case of the supply of electricity; or</p> <p>(b) ...</p> | <p>TGR must provide historical billing data to customer if requested.</p> <p>TGR must provide historic billing data to customer without charge unless data has been requested four times in a 12-month period.</p> | GM Retail | As required | CEO | |
| Rule 29 | <p><u>Billing disputes (SRC and MRC)</u></p> <p>29 (1) A retailer must review a bill if requested to do so by the small customer.</p> <p>29 (2) The retailer must conduct the review in accordance with the retailer’s standard complaints and dispute resolution procedures, including any time limits applicable under those procedures</p> <p>29 (3) The retailer must inform the small customer of the outcome of the review as soon as reasonably possible but, in</p> | <p>TGR must review a bill if customer requests it.</p> <p>TGR must conduct bill review in accordance with its Complaints and Dispute Resolution Policy – refer to 2.10 below.</p> <p>TGR must inform customer of outcome of bill review.</p> | GM Retail | As required | CEO | BMSDOC-18-1912 |

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| | <p>any event, within any time limits applicable under the retailer's standard complaints and dispute resolution procedures.</p> <p>29 (4) The retailer may require the small customer to pay: (a) the lesser of: (i) that portion of the bill under review that the customer and the retailer agree is not the subject of review; or (ii) an amount equal to the average amount of the customer's bills in the previous 12 months (excluding the bill in dispute); and (b) any other bills that are properly due.</p> <p>29 (5) If the small customer requests that, in reviewing the bill, the meter reading or metering data be checked, or the meter tested: (a) the retailer must, as the case may require: (i) arrange for a check of the meter reading or metering data; or (ii) request the responsible person or metering coordinator (as applicable) to test the meter; and (b) the retailer may require the customer to pay for the cost of the check or test if the check or test shows that the meter or metering data was not faulty or incorrect.</p> <p>29(5A) For the purpose of subrule (5), a small customer request made under subrule 21(3A) is not to be treated as a request for the meter reading or metering data to be checked or the meter tested.</p> <p>29 (6) Where, after conducting a review of the bill, the retailer is satisfied that it is: (a) correct, the retailer may require the small customer to pay the amount of the bill that is still outstanding; or (b) incorrect, the retailer: (i) must adjust the bill in accordance with rule 30 or 31, as the case requires; and (ii) may require the customer to pay the amount (if any) of the bill that is still outstanding; and</p> <p>29 (7) The retailer must inform the small customer that the customer may lodge a dispute with the energy ombudsman</p> | <p>TGR may require customer to pay either the portion of the bill not in dispute or the average of the customer's bills over the last 12 months (whichever is less), and any other bill that is due.</p> <p>TGR must arrange meter reading or metering data to be checked or the meter tested when requested but may require the customer to pay for that check or test if the data was not faulty or incorrect.</p> <p>A customer's request for an adjusted bill based on the customer's reading of the relevant meter is not a request for the purposes of rule 29(5).</p> <p>If, following the review, the bill is correct, TGR may require customer to pay outstanding amount.</p> <p>If, following the review, the bill is incorrect, TGR must adjust the bill (as below) and require customer to pay outstanding amount if applicable.</p> <p>At the conclusion of the review, TGR must inform customer</p> | | | | |

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| | <i>after completion of the retailer's review of a bill, where the customer is not satisfied with the retailer's decision in the review and the retailer's action or proposed action under subrule (6).</i> | they may lodge dispute with Ombudsman. | | | | |
| Rule 30 | <p><u>Undercharging (SRC and MRC)</u></p> <p>30 (2) Where a retailer proposes to recover an amount undercharged the retailer must:</p> <p>(a) unless the amount was undercharged as a result of the small customer's fault or unlawful act or omission, limit the amount to be recovered to the amount undercharged in the 9 months before the date the customer is notified of the undercharging; and</p> <p>(b) not charge the customer interest on that amount; and</p> <p>(c) state the amount to be recovered as a separate item in a special bill or in the next bill, together with an explanation of that amount; and</p> <p>(d) offer the customer time to pay that amount by agreed instalments, over a period nominated by the customer being no longer than:</p> <p>(i) the period during which the undercharging occurred, if the undercharging occurred over a period of less than 12 months; or</p> <p>(ii) 12 months, in any other case.</p> | If TGR is attempting to recover undercharged amount, TGR must limit the amount to what was undercharged in the 9 months prior to the customer being notified, not charge interest, state the amount to be recovered, and offer for customer to pay amount by instalments over a period equivalent to when the undercharging occurred, or 12 months if the period equivalent to when the undercharging occurred was greater than 12 months. | GM Retail | As required | CEO | |
| Rule 31 | <p><u>Overcharging (SRC and MRC)</u></p> <p>31 (1) Where a small customer has been overcharged by an amount equal to or above the overcharge threshold, the retailer must inform the customer accordingly within 10 business days after the retailer becomes aware of the overcharging.</p> <p>31 (2) If the amount overcharged is equal to or above the overcharge threshold, the retailer must:</p> <p>(a) repay that amount as reasonably directed by the small customer; or</p> <p>(b) if there is no such reasonable direction, credit that amount to the next bill; or</p> <p>(c) if there is no such reasonable direction and the small customer has ceased to obtain customer retail services from the retailer, use its best endeavours to refund that amount within 10 business days.</p> | <p>TGR must inform customer if they have been overcharged within 10 business days TGR becoming aware of it.</p> <p>If overcharged amount is \$50 or more, TGR must repay customer if requested, or if not requested credit the customer's bill, or if customer is no longer a customer use best endeavours to refund customer within 10 business days.</p> | GM Retail | As required | CEO | |

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| | <p>31 (3) If the amount overcharged is less than the overcharge threshold, the retailer must: (a) credit that amount to the next bill; or (b) if the small customer has ceased to obtain customer retail services from the retailer, use its best endeavours to refund that amount within 10 business days.</p> <p>31 (4) No interest is payable on an amount overcharged.</p> <p>31 (5) If the small customer was overcharged as a result of the customer's unlawful act or omission, the retailer is only required to repay, credit or refund the customer the amount the customer was overcharged in the 12 months before the error was discovered.</p> <p>31 (6) The overcharge threshold is \$50 or such other amount as the AER determines under subrule (7)</p> | <p>If overcharged amount is less than \$50, TGR must credit the customer's bill, or if customer is no longer a customer use best endeavours to refund customer within 10 business days.</p> <p>TGR must not charge interest on overcharged amount.</p> <p>If customer caused themselves to be overcharged, they can only be credited or refunded up to the 12 months prior to the overcharging being discovered.</p> <p>Overcharge threshold is \$50.</p> | | | | |
| Market retail contracts – requirements | | | | | | |
| Rule 46 | <p><u>Tariffs and charges</u></p> <p>46 (2) A retailer must set out in a market retail contract with a small customer all tariffs and charges payable by the customer.</p> <p>46 (3) The retailer must give notice to the customer of any variation to the tariffs and charges that affects the customer.</p> <p>46 (4) The notice must: (a) be given at least five business days before the variation in the tariffs and charges are to apply to the customer; and (b) be delivered by the customer's preferred form of communication where this has been communicated to the retailer, or otherwise by the same method as that used for delivery of the customer's bill.</p> <p>46(4A) The notice must: (a) specify that the customer's tariffs and charges are being varied; (b) specify the date on which the variation will come into effect; (c) identify the customer's existing tariffs and charges inclusive of GST; (d) identify the customer's tariffs and charges as varied</p> | <p>TGR must set out all tariffs and charges in market retail contract.</p> <p>TGR must notify customer of any changes to tariffs and charges.</p> <p>TGR must ensure the notice is given 5 business days before changes to tariffs and charges occurs and that the notice is delivered to customer.</p> <p>TGR must ensure the notice specifies the tariffs and charges are being varied, from what date, what the existing tariffs and charges are, what the varied tariffs and charges are, that the tariffs and charges are inclusive of GST, and that the customer can request historic billing and energy consumption data from TGR.</p> | GM Retail | Ongoing | CEO | |

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| | <p>inclusive of GST. (e) specify that the tariffs and charges identified in subrules (4A) (c) and (d) are inclusive of GST; and (f) specify that the customer can request historical billing data and, if they are being sold electricity, energy consumption data, from the retailer.</p> <p>46(4C) Despite subrule (4)(a), a retailer must provide the notice under subrule (3) as soon as practicable, and in any event no later than the customer's next bill, where the variations to the tariffs and charges are a direct result of a tariff reassignment by the distributor pursuant to clause 6B.A3.2 of the NER. For the purposes of providing a notice under this subrule (4C), the reference to: (a) "are being varied" in subrule (4A) (a) is taken to be "are being varied or have been varied (whichever is applicable)"; and (b) "will come into effect" in subrule (4A) (b) is taken to be "will come into effect or has come into effect (whichever is applicable)".</p> <p>46 (5) The retailer must set out in the market retail contract the obligations with regard to notice that the retailer must comply with where the tariffs and charges are to be varied.</p> | <p>If changes to tariffs and charges are the result of tariff reassignment by distributor, TGR must ensure notice is provided to customer as soon as practicable and no later than the customer's next bill.</p> <p>TGR must ensure the market retail contract must sets out the above requirements relating to notice.</p> | | | | |
| Explicit informed consent | | | | | | |
| Rule 46A | <p><u>Explicit Informed Consent – Variation of tariffs, charges, or benefits to the customer</u></p> <p>46A (1) This rule has effect for the purposes of section 39(1)(a) of the Law. 46A (2) For the purposes of the transaction described in section 38(b) of the Law, matters relevant to the consent of the customer will include, without limitation, any term or condition in the market retail contract that provides for the variation of tariffs, charges or benefits to the customer under that contract.</p> | <p>TGR should ensure market retail contract contains term or condition that customer consents to the variation of tariffs, charges or benefits.</p> | GM Retail | Ongoing | CEO | |
| Market retail contracts – particular requirements | | | | | | |
| Rule 47 | <p><u>Cooling off period and right of withdrawal – market retail contracts</u></p> <p>47 (2) When right of withdrawal may be exercised - The right</p> | <p>TGR must ensure cooling off period in market retail contract is</p> | GM Retail | Ongoing | CEO | |

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| | <p><i>of withdrawal may be exercised within the period of 10 business days (the cooling off period) commencing with the date the small customer receives the required information under rule 64 about the contract.</i></p> <p><i>47 (5) Rights and obligation to be set out in contract - A retailer must include in each market retail contract it enters with a small customer express provisions setting out the rights and obligations provided for by this rule.</i></p> <p><i>47 (6) Record of withdrawal - A retailer must create a record of each withdrawal, and the provisions of section 40 of the Law apply in relation to a record of withdrawal as if it were a record of explicit informed consent.</i></p> | <p>10 business days.</p> <p>TGR must ensure market retail contract expressly states right of withdrawal, that right may be exercised within the cooling off period, that customer's acceptance is not a bar to withdrawal, and that the customer may exercise right orally or in writing.</p> <p>TGR must create a record of each withdrawal.</p> | | | | |
| Rule 48 | <p><u>Retailers notice of end of fixed term retail contract</u></p> <p><i>48 (2) A retailer must, in accordance with this rule, notify a small customer with a fixed term retail contract that the contract is due to end.</i></p> <p><i>48 (3) The notice must be given no earlier than 40 business days and no later than 20 business days before the end date of the contract.</i></p> <p><i>48 (4) The notice must state:</i> <i>(a) the date on which the contract will end; and</i> <i>(b) details of the prices, terms, and conditions applicable to the sale of energy to the premises concerned under a deemed customer retail arrangement; and</i> <i>(c) the customer's options for establishing a customer retail contract (including the availability of a standing offer); and</i> <i>(d) the consequences for the customer if the customer does not enter a customer retail contract (whether with that or another retailer), including the entitlement of the retailer to arrange for the de-energisation of the premises and details of the process for de-energisation.</i></p> <p><i>48 (5) The retailer is not required to give the notice where the customer has already entered a new contract with the retailer or has given instructions to the retailer as to what actions the retailer must take at the end of the contract.</i></p> <p><i>48 (6) A retailer must, for a fixed term retail contract, include a term or condition to the effect that the retailer will:</i></p> | <p>TGR must notify customer to fixed term contract the contract is due to end.</p> <p>TGR must ensure notice is given between 20 and 40 business days before fixed term contract is due to end.</p> <p>TGR must ensure notice states date contract is due to end, details of deemed customer retail arrangement, options for establishing customer retail contract, and consequences of not entering customer retail contract (i.e., de-energisation).</p> <p>TGR not required to give notice if customer has already entered a new contract with TGR or provided TGR with instructions already.</p> <p>TGR must ensure fixed term contract contains a term or condition that TGR will notify customer fixed term contract is</p> | GM Retail | Ongoing | CEO | |

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| | <i>(a) notify the customer that the contract is due to end; and (b) give such notice no earlier than 40 business days and no later than 20 business days before the end of the contract.</i> | due to end between 20 and 40 days before contract is due to end. | | | | |
| Rule 48A | <p><u>Retailers notice of benefit change - market retail contracts</u></p> <p>48A (1) <i>If a market contract provides for a benefit change, the retailer must, in accordance with this rule, notify the small customer of each benefit change.</i></p> <p>48A (2) <i>The benefit change notice must be given:</i> <i>(a) in writing;</i> <i>(b) no earlier than 40 business days and no later than 20 business days before the benefit change date; and</i> <i>(c) otherwise in the manner and form required by the benefit change guidelines.</i></p> <p>48A (3) <i>The benefit change notice must state:</i> <i>(a) the small customer's metering identifier;</i> <i>(b) that a benefit change will occur and the benefit change date;</i> <i>(c) that the small customer may use the price comparator to compare offers that are generally available to classes of small customers in their area;</i> <i>(d) the name and web address of the price comparator;</i> <i>(e) that the customer can request historical billing data and, if they are being sold electricity, energy consumption data, from the retailer that will assist it to use the price comparator to compare offers that are generally available to classes of small customers in their area; and</i> <i>(f) any early termination charges payable under the contract.</i></p> <p>48A (4) <i>In addition to the information required by subrule (3), the benefit change notice must contain such other information that the AER specifies in the benefit change notice guidelines in the form and manner specified in those guidelines.</i></p> | <p>TGR must notify customer of benefit change if market retail contract provides for it.</p> <p>TGR must ensure notice is given in writing between 20 and 40 business days before the benefit is due to change.</p> <p>TGR must ensure notice states metering identifier, that the benefit change will occur and the date, customer may use price comparator, name and web address of price comparator, customer can request historic billing data, and early termination charges payable.</p> <p>TGR must ensure notice complies with Benefit Change Guidelines.</p> | GM Retail | As required | CEO | |
| Rule 50 | <p><u>Small customer complaints and dispute resolution information</u></p> <p>50 (1) <i>A retailer must include, as a minimum requirement in relation to the terms and conditions of a market retail contract, provisions to the effect of the following:</i> <i>(a) the small customer may, if they have a query, complaint or dispute, contact the retailer;</i></p> | TGR must ensure market retail contract includes terms and conditions that the customer can contact TGR with complaints/queries, that TGR must handle the complaint in accordance with the Complaints and Dispute Resolution Policy, that TGR must inform customer of outcome of | GM Retail | Ongoing | CEO | |

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| | <p>(b) the retailer is obliged to handle a complaint made by a small customer in accordance with the retailer’s standard complaints and dispute resolution procedures, which can be found on the retailer’s website or provided to the customer on request.</p> <p>(c) the retailer must inform the small customer of the outcome of the customer’s complaint.</p> <p>(d) if the small customer is not satisfied with the retailer’s response to the customer’s complaint, the customer has a right to refer the complaint or dispute to the energy ombudsman.</p> <p>50 (2) The provisions required to be included in the market retail contract must provide the retailer’s contact details for the small customer to contact the retailer in connection with a query, complaint, or dispute.</p> | <p>complaint, and that if customer is not satisfied with outcome, they may contact Ombudsman.</p> <p>TGR must ensure market retail contract includes TGR’s contact details for complaints/queries.</p> | | | | |
| | Explicit informed consent | | | | | |
| Rule 57 | <p><u>Retailer obligations in relation to customer transfer</u></p> <p>57 (1) A retailer must not submit a request for the transfer of a small customer under the relevant Retail Market Procedures unless:</p> <p>(a) the retailer has obtained explicit informed consent from the customer to enter the relevant customer retail contract;</p> | <p>TGR must not transfer customer to new retailer unless TGR has received customer’s consent</p> | GM Retail | As required | CEO | |
| Notice to small customers on deployment of new electricity meters | | | | | | |
| Rule 59A | <p><u>Notice to small customers on deployment of new electricity meters (SRC and MRC)</u></p> <p>59A (1) If a retailer proposes to undertake a new meter deployment the retailer must, subject to subrule (8), permit a small customer of the retailer to elect not to have its meter replaced as part of the proposed new meter deployment in accordance with this rule (referred to in this rule as the customer’s right to opt out).</p> <p>59A (2) If a retailer proposes to undertake a new meter deployment, the retailer must give to the small customer:</p> <p>(a) a notice in writing no earlier than 60 business days and no later than 25 business days before the retailer proposes to replace the small customer’s meter; and</p> <p>(b) a second notice in writing no earlier than 10 business days</p> | <p>TGR must allow customer to not have meter replaced if they request it.</p> <p>TGR must notify customer between 25 and 60 business days, and then again at least 15 days before meter deployment, of intention to replace meter.</p> | GM Retail | As required | CEO | |

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| | <p>after the notice under subrule (2)(a) was given to the customer and no later than 15 business days before the retailer proposes to replace the small customer's meter.</p> <p>59A (3) A notice under subrule (2)(a) and (b) must state: (a) that the small customer may opt out of having their meter replaced by informing the retailer: (i) in writing, electronically or by telephone; or (ii) by any other method made available by the retailer in addition to the methods specified in subrule (3)(a)(i), at any time up to the date specified in the notice as being the last day on which the customer may notify the retailer of its decision to opt out (referred to in this rule as the last opt-out date); (b) the expected date and time on which the retailer proposes to replace the customer's meter. (c) the last opt-out date, which must be no earlier than 7 business days before the expected date on which the retailer proposes to replace the customer's meter (as specified in accordance with subrule (3)(b)). (d) any upfront charges the customer will incur under its retail contract as a result of the new meter deployment. (e) the retailer's contact details; and (f) contact details of interpreter services in community languages.</p> <p>59A (7) A retailer must not proceed with the replacement of the meter at the premises under the proposed new meter deployment if: (a) before the date of the new meter deployment, the provision of customer retail services to the premises commences under a customer retail contract with a different small customer; and (b) that customer has not been given a right to opt out in accordance with this rule.</p> | <p>TGR must ensure notice states customer can elect to not have meter replaced, when the meter replacement will occur, the last opt-out date, any charges, TGR's contact details and contact details of interpreter.</p> <p>TGR must not replace meter if new customer comes to occupy premises and that customer has not been given opportunity to opt out of having meter replaced.</p> | | | | |
| Retailer interruption to supply | | | | | | |
| Rule 59C | <p><u>Retailer interruption to supply - electricity (SRC and MRC)</u></p> <p>59C (2) If the retailer has not obtained an affected customer's consent to the retailer planned interruption occurring within a date range or on a specified date in accordance with subrule (1) (as applicable), the retailer must notify the affected customer of the retailer planned interruption by any</p> | <p>TGR must notify customer of planned interruption 4 business days before.</p> | GM Retail | As required | CEO | |

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| | <p><i>appropriate means at least 4 business days before the date of the interruption.</i></p> <p>59C (3) <i>The notice given by a retailer under subrule (2) may be given in the same notice required to be given under rule 59A(2)(b).</i></p> <p>59C (4) <i>The notification must:</i> (a) <i>specify the expected date, time and duration of the retailer planned interruption; and</i> (b) <i>include a 24-hour telephone number for enquiries (the charge for which is no more than the cost of a local call); and</i> (c) <i>include a statement that any enquiries regarding the retailer planned interruption are to be directed to the retailer.</i></p> <p>59C (5) <i>In the case of a retailer planned interruption, the retailer must use its best endeavours to arrange to restore the customer's supply as soon as possible.</i></p> | <p>Notice can be in the same notice used for notice of deployment of new electricity meter (if applicable).</p> <p>Notice must specify date, time and duration of interruption, include 24-hour number for enquiries and state that enquiries are to be directed to TGR.</p> <p>TGR must use best endeavours to restore supply as soon as possible.</p> | | | | |
| Energy marketing activities | | | | | | |
| Rule 61 | <p><u>Providing information to small customers</u></p> <p>61 - Overview of this Subdivision (1) <i>This subdivision requires a retail marketer to provide specific information to small customers in connection with market retail contracts.</i> (2) <i>The information is referred to in this Subdivision as required information.</i></p> | TGR must provide specific information to customers in relation to market retail contracts. | GM Retail | Ongoing | CEO | |
| Rule 62 | <p><u>Providing information to small customers</u></p> <p>62 - Requirement for and timing of disclosure to small customers <i>A retail marketer must provide the required information to a small customer in relation to the market retail contract concerned:</i> (a) <i>before the formation of the contract; or</i> (b) <i>as soon as practicable after the formation of the contract.</i></p> | TGR must provide the information to customers either before the market retail contract is entered into or soon after the formation of the market retail contract. | GM Retail | Ongoing | CEO | |
| Rule 63 | <p><u>Providing information to small customers</u></p> <p>63 - Form of disclosure to small customers (1) <i>Required information provided to a small customer before the formation of the market retail contract may be provided</i></p> | TGR must provide the information to customers electronically, verbally or in writing and in a single written disclosure statement. | GM Retail | Ongoing | CEO | |

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| | <p>electronically, verbally or in writing.</p> <p>(2) Required information provided to a small customer after the formation of the market retail contract must be provided in a single written disclosure statement.</p> <p>(3) If required information was provided to a small customer electronically or verbally before the formation of the market retail contract, required information in a single written disclosure statement must also be provided to the customer after the formation of the contract.</p> | <p>If TGR provided the information to customer electronically or verbally before the market retail contract was entered into, TGR must also provide the information in a single written disclosure statement after the market retail contract is entered into.</p> | | | | |
| Rule 64 | <p><u>Providing information to small customers</u></p> <p>64 - Required information</p> <p>(1) The required information that a retail marketer is to provide to a small customer is information in relation to the following:</p> <p>(a) all applicable prices, charges and benefits to the customer (to the extent both are not otherwise part of prices), early termination payments and penalties, security deposits, service levels, concessions or rebates, billing and payment arrangements and how any of these matters may be changed (including, where relevant, when changes to prices will be notified by the retailer to the customer).</p> <p>(b) the commencement date and duration of the contract, the availability of extensions, and the termination of the contract if the customer moves out during the term of the contract.</p> <p>(c) if any requirement is to be or may be complied with by an electronic transaction - how the transaction is to operate and, as appropriate, an indication that the customer will be bound by the electronic transaction or will be recognised as having received the information contained in the electronic transaction.</p> <p>(d) the rights that a customer must withdraw from the contract during the cooling off period, including how to exercise those rights.</p> <p>(e) the customer's right to complain to the retailer in respect of any energy marketing activity of the retail marketer conducted on behalf of the retailer and, if the complaint is not satisfactorily resolved by the retailer, of the customer's right to complain to the energy ombudsman.</p> <p>(2) The required information, when given in a written disclosure statement, must include or be accompanied by a</p> | <p>TGR must include this information in the written disclosure statement.</p> <p>TGR must provide a copy of the market retail contract to the customer with the written disclosure statement.</p> | GM Retail | Ongoing | CEO | |

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| | <i>copy of the market retail contract.</i> | | | | | |
| Rule 65 | <p><u>Energy Marketing activities</u></p> <p>65 - No contact lists (2) A retailer must ensure that a "no contact lists" is created and maintained for its retail marketers, whether by the retailer itself or by a person or organisation on behalf of the retailer.</p> <p>(3) A "no contact list" is a list of small customers who indicate they wish to be placed on the list.</p> <p>(4) A small customer may give such an indication by applying (in person, electronically, by telephone or in writing) to the retailer or by communicating directly with a retail marketer.</p> <p>(5) A retail marketer must not make contact with a small customer whose name is on the relevant no contact list.</p> <p>(6) An entry for a particular small customer in a no contact list continues for a period of 2 years, but the period is refreshed each time the customer requests inclusion or maintenance of inclusion.</p> <p>(7) A retailer must publish a statement on its website about the existence of its no contact list and the procedures for being placed on the list.</p> | <p>TGR must maintain a no contacts list, which is a list of customers who indicate to TGR that they do not want to be contacted by retail marketer.</p> <p>Entries in the no contacts list expire after 2 years unless the customer re-requests inclusion.</p> <p>TGR must have a statement on its website about the no contact list and how customers can be put on it.</p> | GM Retail | Ongoing | CEO | |
| Rule 66 | <p><u>Energy marketing activities</u></p> <p>66 - No canvassing or advertising signs In carrying out energy marketing activities a retail marketer must comply with any signs at a person's premises indicating: (a) canvassing is not permitted at the premises: or (b) no advertising or similar material is to be left at the premises or in a letterbox or other receptacle at or associated with the premises.</p> | A retail marketer must comply with signs on a customer's premises. | Retail Marketer | As required | ? | |
| Rule 67 | <p><u>Energy marketing activities</u></p> <p>67 - Duty of retailer to ensure compliance A retailer must ensure that a retailer marketer who is an associate of the retailer complies with this Subdivision.</p> | TGR must ensure retail marketer complies with the above requirements. | GM Retail | Ongoing | CEO | |
| Rule 68 | <u>Record keeping:</u> | | GM Retail | Ongoing | CEO | |

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| | <p>68 (1) A retailer must ensure that records are kept of all energy marketing activities carried out by it or on its behalf by retail marketers, including details of energy marketing visits that have been conducted, and telephone energy marketing calls that have been placed.</p> <p>68 (2) The retailer must ensure that each such record is retained: (a) for a period of 12 months; or (b) where a small customer has within that period made a complaint or referred a dispute to the energy ombudsman in relation to energy marketing activities - for the period the complaint or dispute remains unresolved. whichever is the longer period.</p> <p>68 (3) A retailer must ensure that it and appropriate officers or employees of the retailer, have immediate access, or a right of immediate access, to each such record.</p> | <p>TGR must keep records of all energy marketing activities.</p> <p>TGR must ensure the records are kept for 12 months or for the duration of a dispute referred to the Ombudsman (whichever is longer).</p> <p>TGR must ensure its officers have access to records of all energy marketing activities.</p> | | | | |
| Customer hardship | | | | | | |
| Rule 71 | <p><u>Obligation of retailer to communicate customer hardship policy</u></p> <p>71(1) A retailer must inform a hardship customer of the retailer of the existence of the retailer's customer hardship policy as soon as practicable after the customer is identified as a hardship customer.</p> <p>71(2) The retailer must provide the hardship customer with a copy of the customer hardship policy on request and at no expense.</p> | <p>TGR must inform hardship customer of Customer Hardship Policy once customer is identified as hardship customer.</p> <p>TGR must provide hardship customer with a copy of the Customer Hardship Policy on request.</p> | GM Retail | As required | CEO | TBC |
| Rule 72 | <p><u>Payment plans</u></p> <p>72(1) A payment plan for a hardship customer must: (a) be established having regard to: (i) the customer's capacity to pay; and (ii) any arrears owing by the customer; and (iii) the customer's expected energy consumption needs over the following 12-month period; and (b) include an offer for the customer to pay for their energy consumption in advance or in arrears by instalment payments.</p> | <p>TGR must establish a payment plan for hardship customers, which includes an offer to pay in instalments.</p> <p>TGR must inform hardship customer of duration of the</p> | GM Retail | As required | CEO | |

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| | 72(2) A retailer who offers a payment plan under this rule for a customer must inform the customer of: (a) the duration of the plan; and (b) the amount of each instalment payable under the plan, the frequency of instalments and the date by which each instalment must be paid; and (c) if the customer is in arrears—the number of instalments to pay the arrears; and (d) if the customer is to pay in advance—the basis on which instalments are calculated. | payment plan, amount of each instalment payable and due date, number of instalments payable for arrears (if applicable) and basis of calculating instalments to be paid in advance (if applicable). | | | | |
| Rule 73 | <u>73 - Waiver of late payment fee for hardship customer</u> A retailer must waive any fee payable under a customer retail contract with a small customer who is a hardship customer for late payment of a bill for customer retail services. | TGR must waive late payment fees for hardship customers. | TGR | As required | CEO | |
| Rule 74 | <u>Payment by Centrepay (SRC and MRC)</u> 74(1) This rule applies where a hardship customer requests a retailer to permit payment by using Centrepay as a payment option (see rule 32). 74(2) If the hardship customer is applying for or on a standard retail contract, the retailer must allow the customer to use Centrepay as a payment option. 74(3) If the hardship customer is on a market retail contract and Centrepay is available as a payment option under that contract, the retailer must allow the customer to use Centrepay as a payment option. 74(4) If the hardship customer is on a market retail contract and Centrepay is not available as a payment option under that contract, the retailer must undertake a review of the market retail contract. 74(5) If, as a result of a review, an alternative customer retail contract is considered to be more appropriate, the retailer must transfer the customer to that alternative contract, where the retailer has obtained the customer's explicit informed consent. 74(6) Any alternative customer retail contract offered to a hardship customer must make Centrepay available as a | If hardship customer under a standard retail contract applies to use centrepay as a payment option, TGR must allow it. If hardship customer under a market retail contract applies to use centrepay as a payment option and centrepay is available as a payment option under that contract, TGR must allow it. If hardship customer under a market retail contract applies to use centrepay as a payment option and centrepay is not available as a payment option under that contract, TGR must review the market retail contract. TGR must transfer hardship customer to alternative customer retail contract following review (once customer's consent is given). TGR must make centrepay available as payment option for hardship customers under alternative retail contract. | TGR | As required | CEO | |

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| | <p>payment option.</p> <p>74(7) If, as a result of the review, there is no alternative customer retail contract considered to be more appropriate, the retailer must make Centrepay available as a payment option under the hardship customer's existing market retail contract.</p> <p>74(8) The retailer must not charge the customer for the review, for any transfer to an alternative retail contract or any early termination charge or other penalty for the early termination of the customer's previous customer retail contract.</p> | <p>If no alternative retail contract is available, TGR must make centrepay available as payment option for hardship customers under their market retail contract.</p> <p>TGR must not charge hardship customer for review or transfer to alternative retail contract or for charges related to early termination of previous contract.</p> | | | | |
| Retailer-initiated de-energisation of premises – small customers | | | | | | |
| Rule 107 | <p><u>De-energisation (or disconnection) of premises—small customers</u></p> <p>(2) A retailer must not arrange de-energisation of the customer's premises except in accordance with Division 2.</p> | TGR must not de-energise premises except as outlined below. | GM Retail | Ongoing | CEO | |
| Rule 111 | <p><u>De-energisation for not paying bill</u></p> <p>111 (1) A retailer may arrange de-energisation of a customer's premises if:</p> <p>(a) the customer:</p> <p>(i) has not paid a bill by the pay-by date; or</p> <p>(ii) is on a payment plan with the retailer and has not adhered to the terms of the plan; and</p> <p>(b) if the customer is a residential customer, the customer:</p> <p>(i) has not paid a bill by the pay-by date; and</p> <p>(ii) has not agreed to an offer to pay the bill by instalments or having agreed to the offer, has failed to adhere to an instalment arrangement;</p> <p>(c) the retailer has given the customer a reminder notice; and</p> <p>(d) the retailer has given the customer a disconnection warning notice after the expiry of the period referred to in the reminder notice; and</p> <p>(e) the retailer has, after giving the disconnection warning notice, used its best endeavours to contact the customer, in connection with the failure to pay, or to agree to the offer or to adhere to the payment plan or instalment arrangement as referred to in paragraphs (a) (ii) and (b) (ii), in one of the following ways:</p> | TGR may arrange de-energisation if customer has not paid bill/not adhered to terms of payment plan and has not agreed/failed to adhere to instalment agreement, and TGR has given customer reminder notice and disconnection warning notice, and TGR has used best endeavours to contact the customer. | GM Retail | As required | CEO | |

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| Clause | Compliance Matter (Obligation) | Process to Achieve Compliance | Position Responsible for Compliance | Milestones/ Timeframes | Compliance Reported to | Process Reference |
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| | <p>(i) in person; (ii) by telephone (in which case contact is, if the telephone is unanswered, taken to have occurred only if the customer acknowledges receipt of a message); (iii) by facsimile or other electronic means (in which case contact is taken to have occurred only if the customer acknowledges receipt of the message); and (f) the customer has refused or failed to take any reasonable action towards settling the debt.</p> <p>111 (2) Where a customer is a hardship customer or a residential customer who has informed the retailer in writing or by telephone that the customer is experiencing payment difficulties, a retailer must not arrange for de-energisation of the customer's premises under subrule (1), unless the retailer has offered the customer 2 payment plans in the previous 12 months and:</p> <p>(b) the customer has agreed to one but not the other of them but the plan to which the customer agreed has been cancelled due to non-payment by the customer; or (c) the customer has agreed to both of them, but the plans have been cancelled due to non-payment by the customer.</p> <p>111 (3) A retailer may arrange de-energisation of a customer's premises if:</p> <p>(a) the customer has, while on a shortened collection cycle, not paid a bill by the pay-by date; and (b) the retailer has given the customer a disconnection warning notice after the pay-by date; and (c) the retailer has, after giving the disconnection warning notice, used its best endeavours to contact the customer, in connection with the failure to pay, or to agree to the offer or to adhere to the payment plan or instalment arrangement as referred to in subrule (1) (a) (ii) and (b) (ii), in one of the following ways: (i) in person; (ii) by telephone (in which case contact is, if the telephone is unanswered, taken to have occurred only if the customer acknowledges receipt of a message); (iii) by facsimile or other electronic means (in which case contact is taken to have occurred only if the customer acknowledges receipt of the message); and (d) the customer has refused or failed to take any reasonable action towards settling the debt.</p> | <p>TGR must not arrange de-energisation of hardship customer if customer has advised TGR they are experiencing payment difficulties, unless TGR has offered hardship customer 2 payment plans in last 12 months and hardship customer has agreed to one/both of those plans, but the plan/s have been cancelled due to non-payment.</p> <p>TGR may arrange de-energisation if customer is on a shortened collection cycle and has not paid bill by due date, TGR has given customer reminder notice and disconnection warning notice, and TGR has used best endeavours to contact the customer.</p> | | | | |

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| Rule 112 | <p><u>De-energisation for not paying security deposit</u></p> <p>112 (1) A retailer may arrange for the de-energisation off a customer's premises if the customer has failed to pay a security deposit and if:</p> <p>(a) the retailer has given the customer a notice of its intention to do so; and</p> <p>(b) the retailer has given the customer a disconnection warning notice after the expiry of the period referred to in the notice of its intention (being not less than 5 business days after the notice of its intention was given).</p> | <p>TGR may arrange de-energisation if customer has not paid security deposit and TGR has given customer notice of intention to de-energise, and disconnection warning notice at least 5 business days after the period in the first notice has expired.</p> | GM Retail | As required | CEO | |
| Rule 113 | <p><u>De-energisation for denying access to meter</u></p> <p>113 (1) A retailer may arrange for de-energisation of a customer's premises if the customer has failed to allow, for 3 consecutive scheduled meter readings, access to the customer's premises to read a meter and if:</p> <p>(a) the retailer has given the customer an opportunity to offer reasonable alternative arrangements for access that are acceptable to the responsible person or metering coordinator (as applicable); and</p> <p>(b) the retailer has on each of the occasions access was denied, arranged for the customer to be given a notice requesting access to the meter at the premises and advising of the retailer's ability to arrange for de-energisation; and</p> <p>(c) the retailer has used its best endeavours to contact the customer:</p> <p>(i) in person; or</p> <p>(ii) by telephone (in which case contact is, if the telephone is unanswered, taken to have occurred only if the customer acknowledges receipt of a message); or</p> <p>(iii) by facsimile or other electronic means (in which case contact is taken to have occurred only if the customer acknowledges receipt of the message); and</p> <p>(d) the retailer has given the customer a notice of its intention to arrange for de-energisation; and</p> <p>(e) the retailer has given the customer a disconnection warning notice after the expiry of the period referred to in the notice of its intention; and</p> <p>(f) the customer has not rectified the matter that gave rise to the right to arrange for de-energisation.</p> <p>113 (2) A retailer may arrange for de-energisation of a customer's premises if the customer does not provide the</p> | <p>TGR may arrange de-energisation if customer has failed to allow access for 3 scheduled meter reads in a row if, TGR has given customer chance to make alternate access arrangements, TGR has given customer a notice requesting access following each of the 3 scheduled meter reads, TGR has used best endeavours to contact the customer, TGR has given customer notice of intention to de-energise, and disconnection warning notice, and customer has not rectified the matter.</p> <p>TGR may arrange de-energisation if customer does not provide TGR safe access to the premises, and TGR has given customer</p> | GM Retail | As required | CEO | |

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| | <p>retailer or its representatives safe access to the customer's premises in accordance with any requirement under the energy laws or otherwise for the purpose of:</p> <p>(a) testing, maintaining, inspecting, or altering any metering installation at the premises.</p> <p>(b) checking the accuracy of metered consumption at the premises; or</p> <p>(c) replacing meters, and if:</p> <p>(d) the retailer has given the customer a disconnection warning notice; and</p> <p>(e) the customer has not rectified the matter that gave rise to the right to arrange for de-energisation of the premises.</p> | disconnection warning notice, and customer has not rectified the matter. | | | | |
| Rule 114 | <p><u>De-energisation for illegally using energy</u></p> <p>114 (1) A retailer may made immediate arrangements for de-energisation of a customer's premises if there has been:</p> <p>(a) fraudulent acquisition of energy at those premises; or</p> <p>(b) intentional consumption of energy at those premises otherwise than in accordance with the energy laws.</p> <p>114 (2) No disconnection warning notice or other notice is required for de-energisation under this rule.</p> | TGR may arrange de-energisation immediately if there has been illegal use of energy at the premises. | GM Retail | As required | CEO | |
| Rule 115 | <p><u>De-energisation for non-notification by move-in or carry-over customers</u></p> <p>115 (1) The financially responsible retailer for a move-in customer's or carry-over customer's premises may arrange for the de-energisation of the premises if the customer refuses or fails to comply with the requirements of section 54 (6) of the Law.</p> <p>115 (2) The financially responsible retailer must not arrange for de-energisation under this rule unless:</p> <p>(a) the retailer has given the customer a notice of its intention to do so; and</p> <p>(b) the retailer has given the customer a disconnection warning notice after the expiry of the period referred to in the notice of its intention, not being less than 5 business days after the notice of its intention was given.</p> <p>115 (3) The financially responsible retailer may commence de-energisation procedures even if the retailer is unable to</p> | <p>TGR may arrange de-energisation of a move-in customer's or carry-over customer's premises if TGR has given customer notice of intention to de-energise, and disconnection warning notice at least 5 business days after the period in the first notice has expired.</p> <p>TGR may de-energise even if the name/particulars of move-in customer or carry-over customer.</p> | GM Retail | As required | CEO | |

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| | ascertain the name or other particulars of the person consuming energy at the premises. | | | | | |
| Rule 116 | <p><u>When retailer must not arrange de-energisation</u></p> <p>116 (1) Restrictions on de-energisation Despite any other provisions of this Division but subject to subrule (2), (3) and (4), a retailer must not arrange for a de-energisation of a customer's premises to occur:</p> <p>(a) where the premises are registered under Part 7 as having life support equipment.</p> <p>(b) where the customer has made a complaint, directly related to the reason for the proposed de-energisation, to the retailer under the retailer's standard complaints and dispute resolution procedures, and the complaint remains unresolved.</p> <p>(c) where the customer has made a complaint, directly related to the reason for the proposed de-energisation, to the energy ombudsman, and the complaint remains unresolved.</p> <p>(c1) where the customer has contacted the retailer under section 41(2)(a) of the Law and the issue raised by the customer remains unresolved.</p> <p>(d) where the customer is a hardship customer or residential customer and is adhering to a payment plan under rule 33 or 72.</p> <p>(e) where the customer informs the retailer, or the retailer is otherwise aware, that the customer has formally applied for assistance to an organisation responsible for a rebate, concession, or relief available under any government funded energy charge rebate, concession or relief scheme and a decision on the application has not been made.</p> <p>(f) on the ground that the customer has failed to pay an amount on a bill that relates to goods and services other than for the sale of energy.</p> <p>(g) for non-payment of a bill where the amount outstanding is less than an amount approved by the AER and the customer has agreed with the retailer to repay that amount.</p> <p>(h) where the customer's premises are to be de-energised under rule 111—during an extreme weather event.</p> <p>(i) during a protected period.</p> | TGR must not arrange de-energisation at a premises that has life-support equipment, if customer has made complaint to TGR about proposed de-energisation, if customer has made complaint to Ombudsman about proposed de-energisation, if customer is hardship customer/residential customer adhering to payment plan, if TGR is aware customer has applied for rebate/concession/relief and awaiting decision of that application, if customer has failed to pay amount that is not related to the sale of energy, if the amount outstanding is less than \$300.00, during an extreme weather event if premises are to be de-energised under r 111 for non-payment, or during a protected period. | GM Retail | Ongoing | CEO | |
| Rule 117 | <p><u>Timing of de-energisation where dual fuel market contract</u></p> <p>117 (1) Application of this rule This rule applies where a retailer and a customer have entered into a dual fuel market contract for the customer's</p> | | GM Retail | As required | CEO | |

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| | <p>premises and the retailer has the right to arrange for de-energisation of the customer's gas supply and the customer's electricity supply under this Division.</p> <p>117 (3) De-energisation of electricity supply The retailer may exercise the right to arrange for de-energisation of the customer's electricity supply in accordance with timing determined under the dual fuel market contract but no earlier than 15 business days after the date of the de-energisation of the customer's gas supply under subrule (2).</p> <p>117 (4) Restrictions on de-energisation not affected Nothing in this rule affects the operation of rule 116.</p> | <p>If using dual fuel market contracts, TGR may arrange de-energisation of customer's electricity supply at least 15 business days after de-energising the customer's gas supply.</p> | | | | |
| Rule 118 | <p><u>Request for de-energisation</u></p> <p>118 (1) If a customer requests the retailer to arrange for the de-energisation of the customer's premises, the retailer must use its best endeavours to arrange for:</p> <p>(a) de-energisation in accordance with the customer's request; and (b) a meter reading; and (c) if applicable, the preparation and issue of a final bill for the premises.</p> | <p>If customer requests de-energisation, TGR must use best endeavours to fulfil request, undertake meter read and prepare final bill.</p> | GM Retail | As required | CEO | |
| Rule 121 | <p><u>Obligation on retailer to arrange re-energisation of premises</u></p> <p>121 (1) Where a retailer has arranged for the de-energisation of a small customer's premises and the customer has within 10 business days of the de-energisation:</p> <p>(a) if relevant, rectified the matter that led to the de-energisation or made arrangements to the satisfaction of the retailer; and (b) made a request for re-energisation; and (c) paid any charge for re-energisation. the retailer must, in accordance with any requirements under the energy laws, initiate a request to the distributor for re-energisation of the premises or arrange to re-energise the customer's premises remotely if permitted under the energy laws.</p> | <p>If customer has, within 10 days of de-energisation, rectified matter that caused de-energisation, requested re-energisation and paid any re-energisation charge, TGR must arrange for the premises to be re-energised.</p> | GM Retail | As required | CEO | |
| Retailer obligations, life support equipment | | | | | | |
| Rule 124 | <p><u>Registration of life support equipment</u></p> | | GM Retail | As required | CEO | |

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| | <p>124 (1) Retailer obligations when advised by customer When advised by a customer that a person residing or intending to reside at the customer’s premises requires life support equipment, a retailer must:</p> <p>(a) register that a person residing or intending to reside at the customer’s premises requires life support equipment and the date from which the life support equipment is required. (b) subject to subrule (2), no later than 5 business days after receipt of advice from the customer, provide in writing to the customer:</p> <p>(i) a medical confirmation forms. (ii) information explaining that, if the customer fails to provide medical confirmation, the customer’s premises may be deregistered and, if so, the customer will cease to receive the protections under this Part. (iii) advice that there may be retailer planned interruptions under rule 59C to the supply at the address and that the retailer is required to notify them of these interruptions in accordance with rule 124B. (iv) advice that there may be distributor planned interruptions or unplanned interruptions to the supply at the address and that the distributor is required to notify them of a distributor planned interruption in accordance with rule 124B; (v) information to assist the customer to prepare a plan of action in the case of an unplanned interruption; (vi) an emergency telephone contact number for the distributor and the retailer (the charge for which is no more than the cost of a local call); and (vii) advice that if the customer decides to change retailer at the premises and a person residing at the customer’s premises continues to require life support equipment, the customer should advise their new retailer of the requirement for life support equipment; and</p> <p>(c) subject to subrule (2), notify the distributor that a person residing or intending to reside at the customer’s premises requires life support equipment and the date from which the life support equipment is required.</p> <p>124 (3) Retailer obligations when advised by distributor When notified by a distributor:</p> <p>(a) under subrule (4)(c), a retailer must register that a person residing or intending to reside at the customer’s premises requires life support equipment and the date from which the life support equipment is required; and</p> | <p>If customer advises a person residing at customer’s premises requires life support equipment, TGR must register that person, provide customer within 5 business days with a medical information form, information about the form, that they will be notified of planned/unplanned interruptions, information about what to do in unplanned interruptions, emergency phone numbers, must advise new retailer of requirement if they change retailer, and notify the distributor.</p> <p>If distributor advises a person residing at customer’s premises requires life support equipment, TGR must register that person, and within 5 business days of being advised by distributor, provide customer with information that they will be notified of planned/unplanned interruptions, information about what to do in unplanned interruptions, emergency phone numbers (if</p> | | | | |

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| | <p><i>(b) under subrule 124B(2)(b), a retailer must:</i></p> <p><i>(i) register that a person residing or intending to reside at the customer's premises requires life support equipment and the date from which the life support equipment is required; and</i></p> <p><i>(ii) no later than 5 business days after receipt of advice from the distributor, provide the customer with the information required by subrules (1)(b)(iii) and (1)(b)(vi), if not already provided by the retailer to the customer in respect of the customer's premises.</i></p> <p><i>Registration of life support equipment</i></p> <p><i>124 (6) Content of medical confirmation form</i></p> <p><i>(a) A medical confirmation form must:</i></p> <p><i>(i) be dated.</i></p> <p><i>(ii) state that completion and return of the form to the retailer or distributor (as the case may be) will satisfy the requirement to provide medical confirmation under the Rules.</i></p> <p><i>(iii) request the following information from the customer:</i></p> <p><i>(A) property address;</i></p> <p><i>(B) the date from which the customer requires supply of energy at the premises for the purposes of the life support equipment; and</i></p> <p><i>(C) medical confirmation;</i></p> <p><i>(iv) specify the types of equipment that fall within the definition of life support equipment;</i></p> <p><i>(v) advise the date by which the customer must return the medical confirmation form to the retailer or distributor (as the case may be); and</i></p> <p><i>(vi) advise the customer they can request an extension of time to complete and return the medical confirmation form.</i></p> | <p>TGR has not already provided customer with that information).</p> <p>TGR must ensure medical confirmation form is dated, that it says it satisfies requirement to provide medical confirmation (once completed and returned), and request the customer's address, date supply for life support equipment is required from, medical confirmation, date it must be returned, information about extensions of time, and what the life support equipment actually is.</p> | | | | |
| Rule 124A | <p><u>Confirmation of premises as requiring life support equipment</u></p> <p><i>124A (1) Where a medical confirmation form is provided under rule 124, the retailer or distributor (as the case may be) must:</i></p> <p><i>(a) from the date of the medical confirmation form, give the customer a minimum of 50 business days to provide medical confirmation.</i></p> <p><i>(b) provide the customer at least two written notices to remind the customer that the customer must provide medical confirmation (each a confirmation reminder notice);</i></p> <p><i>(c) ensure the first confirmation reminder notice is provided no less than 15 business days from the date of issue of the medical confirmation form.</i></p> | <p>TGR must give customer 50 business days to complete and return medical confirmation form, provide customer with at least 2 reminder notices to complete and return it; the first reminder notice being at least 15 business days from the date of issue of the form, the second reminder notice being at least 15 business days from the date of issue of the first reminder notice, and give the customer at least one extension of time (minimum 25 business days) at their request.</p> | GM Retail | As required | CEO | |

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| | <p>(d) ensure the second confirmation reminder notice is provided no less than 15 business days from the date of issue of the first confirmation reminder notice; and</p> <p>(e) on request from a customer, give the customer at least one extension of time to provide medical confirmation. The extension must be a minimum of 25 business days.</p> <p>124A (2) A confirmation reminder notice must:</p> <p>(a) be dated;</p> <p>(b) state the date by which the medical confirmation is required;</p> <p>(c) specify the types of equipment that fall within the definition of life support equipment; and</p> <p>(d) advise the customer that:</p> <p>(i) the customer must provide medical confirmation;</p> <p>(ii) the premises is temporarily registered as requiring life support equipment until the medical confirmation is received;</p> <p>(iii) failure to provide medical confirmation may result in the premises being deregistered; and</p> <p>(iv) the customer can request an extension of time to provide medical confirmation.</p> <p>124A (3) Application of this rule to standard retail contracts This rule applies in relation to standard retail contracts.</p> <p>124A (4) Application of this rule to market retail contracts This rule applies in relation to market retail contracts.</p> | <p>TGR must ensure reminder notice is dated, state the date the medical confirmation is required, define life support equipment, advise customer they must provide the confirmation, that the registration is only temporary, that failure to complete and return form may result in premises being deregistered, and that the customer can request an extension of time.</p> | | | | |
| Rule 124B | <p><u>Ongoing retailer and distributor obligations</u></p> <p>124B (1) Retailer obligations Where a retailer is required to register a customer's premises under subrule 124(1)(a) or 124(3), the retailer has the following ongoing obligations:</p> <p>(a) give the distributor relevant information about the life support equipment requirements for the customer's premises and any relevant contact details for the purposes of updating the distributor's registration under subrule 124(4)(a) or 124(5), unless the relevant information was provided to the retailer by the distributor;</p> <p>(b) when advised by a customer or distributor of any updates to the life support equipment requirements for the customer's premises or any relevant contact details, update the retailer's registration;</p> <p>(c) except in the case of a retailer planned interruption under</p> | <p>If TGR registers premises as requiring life support equipment, TGR must provide distributor with all relevant information about the life support requirements (including contact details), update the registration as required, not de-energise the premises (except in planned outage), give customer 4 business days' written notice of planned outage, and once customer consents to planned outage provide them with time/duration of planned outage and 24-hour contact number.</p> | GM Retail | Ongoing | CEO | |

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| | <p>rule 59C, not arrange for the de-energisation of the premises from the date the life support equipment will be required at the premises; and</p> <p>(d) in the case of a retailer planned interruption under rule 59C, other than in the circumstances described in paragraph (e), from the date the life support equipment will be required at the premises, give the customer at least 4 business days written notice of the retailer planned interruption to supply at the premises (the 4 business days to be counted from, but not including the date of receipt of the notice); and</p> <p>(e) in the case of a retailer planned interruption where the customer has provided consent to the retailer under subrule 59C(1)(c), give written notice to the customer of the expected time and duration of the retailer planned interruption, and specify a 24-hour telephone number for enquiries (the charge for which is no more than the cost of a local call).</p> | | | | | |
| Rule 125 | <p><u>Deregistration of premises</u></p> <p>125 (1) A retailer or distributor may only deregister a customer's premises in the circumstances permitted under this rule 125.</p> <p>125 (2) If a customer's premises is deregistered:</p> <p>(a) by a retailer, the retailer must, within 5 business days of the date of deregistration, notify the distributor of the date of deregistration and reason for deregistration;</p> <p>(b) by a distributor, the distributor must, within 5 business days of the date of deregistration, notify the retailer of the date of deregistration and reason for deregistration: and"</p> <p>(c) the retailer and the distributor must update their registrations under subrules 124(1)(a), 124(3), 124(4)(a) and 124(5) as required by rule 126.</p> <p>125 (4) Where a customer, whose premises have been registered by a retailer under subrule 124(1)(a) (and subrule 124(2) does not apply), fails to provide medical confirmation, the retailer may deregister the customer's premises only when:</p> <p>(a) the retailer has complied with the requirements under rule 124A.</p> <p>(b) the retailer has taken reasonable steps to contact the customer in connection with the customer's failure to provide medical confirmation in one of the following ways:</p> <p>(i) in person.</p> <p>(ii) by telephone; or</p> | <p>If a customer's premises is de-registered as requiring life-support equipment, TGR must notify distributor of the date of deregistration and the reasons for deregistration, within 5 business days, and update its registrations accordingly.</p> <p>If customer fails to provide TGR with medical confirmation, TGR may de-register customer only after two reminder notices have been sent as explained above, TGR has used best endeavours to contact the customer, TGR has issued customer with a de-registration notice at least 15 days after the second reminder notice was sent, and the customer still has not provided the medical confirmation before the date specified in the de-registration notice.</p> | GM Retail | As required | CEO | |

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| | <p>(iii) by electronic means. (c) the retailer has provided the customer with a deregistration notice no less than 15 business days from the date of issue of the second confirmation reminder notice issued under subrule 124A(1)(d); and (d) the customer has not provided medical confirmation before the date for deregistration specified in the deregistration notice.</p> <p>125 (6) A deregistration notice must: (a) be dated. (b) specify the date on which the customer’s premises will be deregistered, which must be at least 15 business days from the date of the deregistration notice. (c) advise the customer the premises will cease to be registered as requiring life support equipment unless medical confirmation is provided before the date for deregistration; and (d) advise the customer that the customer will no longer receive the protections under this Part when the premises is deregistered.</p> | <p>TGR must ensure de-registration notice is dated, state the date the premises will be de-registered (which must be 15 business days after date of notice), that without medical confirmation the premises will cease to be registered, and that the customer will no longer receive the protections of a premises requiring life-support equipment.</p> | | | | |
| 2.4 AER Better Bills Guideline | | | | | | |
| Part 2 | <p><u>Contents of bills – transitional requirements</u></p> <p>10. A retailer must prepare a bill so that a small customer can easily verify that the bill conforms to their customer retail contract and must include the following particulars in a bill for a small customer:</p> <p>(a) the customer’s name and account number; (b) the address of the customer’s premises for the sale of energy and the customer’s mailing address (if different); (c) the meter identifier; (d) the billing period; (e) the pay-by date for the bill and the bill issue date; (f) the total amount payable by the customer, including amounts of any arrears or credits; (g) tariffs and charges applicable to the customer; (h) the basis on which tariffs and charges are calculated; (i) whether the bill was issued as a result of a meter reading or an estimation and, if issued as a result of a meter reading, the date of the meter reading; (j) the values of meter readings (or, if applicable, estimations) at the start and end of the billing period;</p> | <p>TGR must ensure a customer’s bill includes each of these requirements.</p> | GM Retail | Ongoing | CEO | |

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| | <p><i>Note: For details on the application of this subsection to different types of meters, see Schedule 3, Part 4, rule 8 of the Retail Rules.</i></p> <p>(k) particulars of the average daily consumption during the billing period;</p> <p>(l) if a bill was issued by the same retailer for the corresponding billing period during the previous year, particulars of the average daily consumption during that previous billing period;</p> <p>(m) the estimated date of the next scheduled meter reading (if applicable);</p> <p>(n) details of consumption or estimated consumption of energy;</p> <p>(o) for residential customers – energy consumption benchmarks in accordance with Part 11 of the National Energy Retail Rules;</p> <p>(p) any amount deducted, credited or received under a government-funded energy charge rebate, concession or relief scheme or under a payment plan;</p> <p>(q) if the customer has provided a security deposit, the amount of that deposit;</p> <p>(r) details of the available payment methods;</p> <p>(s) reference to the availability of government-funded energy charge rebate, concession or relief schemes;</p> <p>(t) a telephone number for account enquiries, the charge for which is no more than the cost of a local call;</p> <p>(u) a telephone number for complaints (which may be the same as that for account enquiries), the charge for which is no more than the cost of a local call;</p> <p>(v) a separate 24-hour telephone number for fault enquiries and emergencies, the charge for which is no more than the cost of a local call, being the telephone number for the distributor and giving the name of the distributor;</p> <p>(w) contact details of interpreter services in community languages;</p> <p>(x) any proportionate billing information in accordance with rule 22 of the Retail Rules</p> | | | | | |
| s 40-42 | <p><u>Requirement to present billing information using a tiered approach</u></p> <p>Tier 1 information is:</p> <p>(a) customer name and address of the premises to which the energy is being supplied as well as the customer's mailing address, if different;</p> | TGR must ensure a customer's bill includes each of these requirements. | GM Retail | Ongoing | CEO | |

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| | <p>(b) amount due and due date;</p> <p>(c) bill issue date;</p> <p>(d) payment methods;</p> <p>(e) customer account number;</p> <p>(f) National Metering Identifier (NMI) presented using the exact words 'National Metering Identifier (NMI) followed by the small customer's NMI;</p> <p>(g) a link to the Energy Made Easy website: www.energymadeeasy.gov.au;</p> <p>(h) a deemed better offer message;</p> <p>(i) retailer identifying information;</p> <p>(j) a telephone number for the customer to:</p> <p>(i) make account enquiries and complaints;</p> <p>(ii) contact the relevant energy ombudsman;</p> <p>(k) the name and telephone number of the relevant distributor for the customer to make fault inquiries and report emergencies; and</p> <p>(l) headings intended to assist a customer's understanding of the prescribed Tier 1 information.</p> <p>Tier 2 information is:</p> <p>(a) <u>a plan summary</u>;</p> <p>(b) a summary of tariffs, charges and charging windows as applicable, which must be included in either the plan summary (section 41(a)) or understand your bill section));</p> <p>(c) a breakdown of how the amount due was calculated (the understand your bill section), including by reference to the following (where applicable):</p> <p>(i) billing period (date-to-date) and number of days;</p> <p>(ii) previous reading;</p> <p>(iii) current reading;</p> <p>(iv) usage, including but not limited to shoulder, peak or off-peak (for electricity in kilowatt-hours (kWh);</p> <p>(v) rates/tariffs, in dollar figures;</p> <p>(vi) charges, in dollar figures;</p> <p>(vii) credits, in dollar figures;</p> <p>(viii) discounts;</p> <p>(ix) any amount deducted, credited or received under a government funded energy charge rebate, concession or relief scheme under a payment plan;</p> <p>(x) any GST; and</p> <p>(xi) exports.</p> <p>(d) average daily usage and exports, in kWh or MJ;</p> | <p>TGR must ensure the deemed best offer message meets the requirements in the Guide (outlined below).</p> <p>TGR must ensure the plan summary meets the requirements in the Guide (outlined below).</p> <p>TGR must ensure the bill contains an "understand your bill section" under Tier 2.</p> | | | | |

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| | <p>(e) if a bill was issued by the same retailer for the corresponding billing period in the previous year, the <u>particulars of the customers' consumption in that previous billing period</u>;</p> <p>(f) contact details to enable a small customer to access:</p> <ul style="list-style-type: none"> (i) financial assistance; (ii) interpreter services (in community languages); and (iii) services for customers with hearing or speech impairments; <p>(g) whether the bill amount is based on metering data or an estimation of the customer's consumption of energy. Where a bill amount is based on an estimation of the customer's consumption of energy, the bill must:</p> <ul style="list-style-type: none"> (i) state that the relevant amount is 'based on an estimation'; (ii) not use an abbreviation of this, for example the letter 'E'; and (iii) include the guidance and requirements for a customer read estimate required under rule 21(3C) of the Retail Rules. | <p>TGR must ensure the bill contains a comparison with customers' consumption in the corresponding billing period in the previous year (i.e., by use of a graph).</p> | | | | |
| s 45-61 | <p><u>Identification of deemed better offer</u></p> <p>45. Before issuing a bill to a small customer, a retailer must carry out a deemed better offer check for that customer and identify the relevant deemed better offer for that customer in accordance with this Part.</p> <p>46. The deemed better offer must be either:</p> <ul style="list-style-type: none"> (a) the plan that the retailer offers which: <ul style="list-style-type: none"> (i) is the lowest cost generally available plan applicable to the customer having regard to the customer's annual usage history; and (ii) does not have as a precondition or condition that the customer have or maintain an affiliation or membership with an entity that is unrelated to the retailer; or (b) a plan that has a lower cost than the lowest cost generally available plan applicable to the customer. <p>47. Where the customer is party to a customer retail contract that provides a discount on condition that the customer buys another good or service, the deemed better offer identified in accordance with section 46 must be determined without any such discount.</p> | <p>TGR must carry out deemed better offer check before issuing bill.</p> <p>TGR must ensure the deemed better offer is either the lowest available plan or a plan that has a lower cost than the available lowest plan.</p> <p>TGR must ensure deemed better offer is without any discount that may be available to customer under their retail contract.</p> | GM Retail | Ongoing | CEO | |

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| | <p><i>Deemed better offer check</i> 48. A retailer must carry out a deemed better offer check in accordance with the following formula: <i>deemed better offer check result = A – B</i> Where: A = annual total cost of current plan B = annual total cost of deemed better offer</p> <p>49. If the deemed better offer check result is greater than \$22 (inclusive of GST), the deemed better offer check result is negative.</p> <p>50. If the deemed better offer check result is less than or equal to \$22 (inclusive of GST), the deemed better offer check result is positive.</p> <p><i>Retailers to give customers deemed better offer message</i> 51. A retailer must provide a deemed better offer message on a bill to a small customer: (a) at least once every 100 days; or (b) where the retailer and customer have agreed to a different billing cycle under rule 24(2) of the Retail Rules and the billing cycle is greater than 100 days, a deemed better offer message issued in alignment with that billing cycle.</p> <p>52. A retailer must, before providing a deemed better offer message on a small customer's bill: (a) determine the deemed better offer for the relevant customer in accordance with section 46 as at the date the bill containing the deemed better offer message will be issued; and (b) using this deemed better offer, perform the deemed better offer check for the customer.</p> <p>53. If the deemed better offer check result is negative, the retailer must include the negative deemed better offer message on the small customer's bill.</p> <p>54. If the deemed better offer check result is positive, the retailer must include the positive deemed better offer message on the small customer's bill.</p> | <p>TGR must ensure deemed better offer check is calculated by subtracting the annual total cost of deemed best offer from the annual total cost of the current plan, and if that is greater than \$22 then the deemed better offer check is negative and if less than or equal to \$22 the deemed better offer check is positive.</p> <p>TGR must ensure deemed better offer message is provided at least once every 100 days or as otherwise agreed with the customer.</p> <p>TGR must ensure negative/positive deemed better offer message is on customer's bill.</p> | | | | |

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| | <p>55. A retailer is not required to provide a deemed better offer message on a customer's bill where the customer's estimated annual consumption level determined for the purpose of carrying out a deemed better offer check, would result in the customer no longer being a small customer.</p> <p>56. A retailer is not required to provide a deemed better offer message on a small customer's bill where the customer receives a single bill in respect of the sale and supply of energy at two or more premises.</p> <p>58. A negative deemed better offer message must be located adjacent to and no less prominently than the amount due.</p> <p>59. A positive deemed better offer message must be located adjacent to and no less prominently than the amount due.</p> <p>60. A negative deemed better offer message: (a) must contain a title using the exact words 'Could you save money on another plan?'; (b) must contain the exact words 'Based on your past usage, our' followed by the name of the deemed better offer plan, followed by the exact words 'may cost you up to', followed by the dollar amount of the deemed better offer check result, followed by the exact words 'less per year than your current plan.'; (c) must contain the exact words 'The Australian Energy Regulator requires us to include this information.'; (d) where the deemed better offer is subject to conditions, may provide that conditions apply and set out the nature of those conditions; and (e) must contain clear and simple instructions on how to switch to the deemed better offer.</p> <p>61. A positive deemed better offer message: (a) must contain a title using the exact words 'Could you save money on another plan?'; (b) must contain the exact words 'Based on your past usage, you are on the best plan we can offer you.'; (c) must contain the exact words 'The Australian Energy Regulator requires us to include this information.'; and (d) must contain clear and simple instructions on how to compare other plans on Energy Made Easy</p> | <p>TGR is not required to include deemed better offer message on bill if:</p> <ul style="list-style-type: none"> customer's estimated annual consumption means customer is no longer small customer; customer receives bill for two or more premises; <p>TGR must ensure negative/positive deemed better offer message is located adjacent to and no less prominently than the amount due.</p> <p>TGR must ensure negative deemed better offer message says: "could you save money on another plan? Based on your past usage, our XX plan may cost you up to \$XX less per year than your current plan. The Australian Energy Regulator requires us to include this information." TGR must also ensure negative deemed better offer message provides that conditions apply and what they are (if applicable) and must contain instructions on how to switch to the new deemed better offer".</p> <p>TGR must ensure positive deemed better offer message says: "Could you save money on another plan? Based on your past usage, you are on the best plan we can offer you. The Australian Energy Regulator requires use to include this information." TGR must also ensure positive deemed better offer message contains instructions on how to compare plans on Energy Made Easy.</p> | | | | |

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| s 42-44 | <p><u>Requirement to prepare and include a plan summary</u></p> <p>42. The purpose of a plan summary is to help small customers easily understand and compare the key features of their plan.</p> <p>43. The plan summary must include the following information: (a) plan name (if applicable); (b) renewable sources and carbon offsets, if applicable to a small customer's plan; and <i>Note: A retailer is required to include, in a plan summary, the renewable sources and carbon offsets where this is a specific feature of the small customer's plan. A retailer is not required to include this information where it is not a feature of a small customer's contract.</i> (c) benefit and benefit change date, if applicable to a small customer's plan.</p> <p>44. The plan summary must be presented in accordance with section 22.</p> | <p>TGR must ensure the plan summary includes plan name, any applicable renewable sources/carbon offsets, and any applicable benefit/benefit change date.</p> <p>TGR must ensure the plan summary uses simple language, is easy to understand, makes the important information most prominent.</p> | GM Retail | Ongoing | CEO | |
| 2.5 AER Compliance Procedures and Guidelines | | | | | | |
| Part 3 | <u>Obligation to submit information and data on compliance to the AER</u> | TGR must comply with reporting obligations at 1.4 above. | GM Retail | As required | CEO | |
| 2.6 AER (Retail Law) Performance Reporting Procedures and Guidelines | | | | | | |
| Part 2 | <u>Obligation to submit information and data on performance to the AER</u> | TGR must comply with reporting obligations at 1.4 above. | GM Retail | As required | CEO | |
| 2.7 AER Retail Pricing Information Guidelines | | | | | | |
| Clause 31-68 | <p><u>Submitting information to the AER for Energy Made Easy</u></p> <p>31. Retailers must provide information and data for all relevant plan fields, as detailed in the 'Offer Fields and Validation Criteria' technical document provided in the Energy Made Easy retailer secure area.</p> <p>32. Clauses 33 to 68 provide additional information relating to price information, discounts, incentives, fees and other additional information to be provided.</p> <p><i>Price information</i> 33. Retailers must provide: a. the unit price for electricity and/or gas, expressed in cents per kWh or cents per MJ as appropriate. These must be labelled using the word 'usage' b. any demand charges, where relevant, labelled as cents per</p> | <p>TGR must comply with obligations at 1.4 above.</p> <p>TGR must also provide AER with the following information:</p> <ul style="list-style-type: none"> - Price information - Discounts - Guaranteed discounts - Conditional discounts | GM Retail | Ongoing | CEO | |

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| | <p><i>kW, per kVA or per kVAR. These must be labelled as ‘demand charges’</i></p> <p><i>c. any fixed or standing charge, expressed in ‘cents per day’ and labelled as a ‘daily supply charge’.</i></p> <p><i>Discounts</i></p> <p><i>34. A retailer must, for a plan that includes a discount, enter the following information into Energy Made Easy to populate the plan documents:</i></p> <p><i>a. the amount and/or percentage of the discount</i></p> <p><i>b. for percentage discounts, what component of the customer’s bill the discount applies to. For example, whether the discount is off usage, the supply charge or the whole bill, and if the discount is off the GST inclusive or exclusive charges</i></p> <p><i>c. the base level tariff and what the discount is off</i></p> <p><i>d. where information on the base level tariff can be found (including the specific page where it can be found on the retailer’s website)</i></p> <p><i>e. for dual fuel plans, which fuel(s) the discount applies to</i></p> <p><i>f. for solar plans, how any discounts are to be applied. For example, is the discount off total usage, or the net bill amount after solar credits.</i></p> <p><i>Guaranteed discounts</i></p> <p><i>35. A guaranteed discount is any discount that does not require a particular action or behaviour on the part of the customer.</i></p> <p><i>Conditional discounts</i></p> <p><i>36. Conditional discounts are discounts that only apply if a customer satisfies certain requirements or conditions. Examples of conditional discounts include but are not limited to:</i></p> <p><i>a. pays on time discounts</i></p> <p><i>Retail Pricing Information Guidelines version 5 10</i></p> <p><i>b. bundling discounts (when a customer signs up to both electricity and gas with a retailer)</i></p> <p><i>c. direct debit discounts.</i></p> <p><i>37. A retailer must clearly state in the data and information provided to Energy Made Easy the condition(s) the customer must satisfy to receive the discount, for example, paying the bill by the due date.</i></p> | <ul style="list-style-type: none"> - Specific conditions to receive discounts - Incentives - Fees - Additional information - Eligibility criteria - Metering configurations and tariff type - Dual fuel plans - Language requirements | | | | |

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| | <p><i>Incentives</i></p> <p>38. An incentive is a benefit to the customer other than a discount, including non-price benefits, one-off price benefits or physical gifts that are provided to a customer upon entry to a contract.</p> <p>39. Retailers must provide details of non-price incentives that form part of the plan when they provide plan information to Energy Made Easy. Examples of non-price incentives include vouchers for use in energy retail stores, magazine subscriptions, cinema tickets or tickets to sporting events.</p> <p>40. In the event of early exit from a contract, if a customer is required to pay the retailer the value of the incentive this must be stated in the plan documents.</p> <p>41. Any other benefits that have a one-off application, including price benefits, must be clearly and simply explained in the information provided to Energy Made Easy.</p> <p>42. Retailers must also clearly state if any sign-up incentives (i.e., one off price benefits) will be applied before or after GST is added to bills.</p> <p><i>Fees</i></p> <p>43. Retailers must provide the key fees applicable to a plan to Energy Made Easy. A 'key fee' is any fee applying to a plan that will be incurred by:</p> <ul style="list-style-type: none"> a. all customers or b. a significant portion of customers. <p>44. The amount of each fee must be specified in dollars (inclusive of GST) or as a percentage of the bill amount (inclusive of GST).</p> <p>45. If a retailer applies any further fees to a plan that are not key fees, they must include, in the information provided to Energy Made Easy, a reference to where a customer can access additional information on these fees. For example, a fee or charge that relates to a special meter read or meter inspection fee and is not a key fee. The reference must be to a specific URL where details of these fees can be found.</p> | | | | | |

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| | <p>46. Retailers must name any fees relating to the disconnection or reconnection of a customer as ‘Disconnection fees’ and ‘reconnection fees’ respectively. In the description of these fees, it must be clearly stated when the fee will be charged. For example, if a disconnection fee will be charged when the customer moves property, this must be clearly stated.</p> <p>47. Key fees include but are not limited to:</p> <ul style="list-style-type: none"> a. connection/move-in fees b. account establishment fees c. annual fees/membership fees d. exit fees e. late payment fees f. disconnection fee for non-payment <p>Retail Pricing Information Guidelines version 5.11</p> <ul style="list-style-type: none"> g. disconnection fee on moving out of the premises h. reconnection fees i. payment processing fees. For example, credit card fees, direct debit fees, and fees for paying in person at the post office j. metering fees. <p>Additional information to be provided</p> <p>48. Retailers must also provide the following information to Energy Made Easy for publication on plan documents:</p> <ul style="list-style-type: none"> a. the distribution area that the plan applies to b. the billing period and if flexible billing options (i.e., monthly billing) are available c. the cooling off period d. the length of the contract or, where applicable, the fact the contract has no specified length e. the length of the benefit period f. the arrangements that will take place at the expiry of the contract or benefit period g. whether a retailer may vary the prices that apply to a plan and, if the price may vary, how and when customers will be notified of price variations h. how and where customers can access information on the full terms and conditions of the plan i. a retailer’s contact information, including contact phone number and website details | | | | | |

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| | <p><i>j. metering arrangements and any associated costs</i> <i>k. payment methods, including payment options</i> <i>l. if a plan is a fixed price plan based on a specific usage amount, any conditions associated with this plan including consequences of the customer using more than that amount</i> <i>m. if a plan is a ‘capped’ plan, meaning there is a fixed price per billing period irrespective of usage, what the cap is and what is included in the cap</i> <i>n. if a plan is priced as an estimate based on the customer’s previous usage and any conditions associated with these plans.</i></p> <p>49. If the electricity or gas charges of a plan are not able to be expressed as a unit price, the retailer is not required to provide the price information as detailed in clause 33.</p> <p>50. Where the retailer is not able to provide prices due to the design of the plan, a Comparison Pricing Table (see clauses 112-116) will not be displayed on the BPID.</p> <p><i>Eligibility criteria</i> 51. Retailers must provide details of any specific eligibility restrictions that would prevent a customer accessing a generally available plan. Examples of specific eligibility restrictions include access to the plan being conditional on the customer:</p> <p><i>a. being a member of a particular club – for example: a motoring club, sporting club, or business or leisure association</i> Retail Pricing Information Guidelines version 5 12 <i>b. purchasing a particular product or service, which could be from the retailer themselves or another company partnering with the retailer – for example, purchasing a smart meter or battery, signing on to a retailer rewards program or purchasing an internet/mobile phone contract from the retailer or another company partnering with the retailer</i> <i>c. purchasing the plan through sign up channels other than the retailer – for example a comparison website, partner company or connection service</i> <i>d. purchasing the plan online only through the retailer</i> <i>e. being an existing customer of the retailer</i></p> | | | | | |

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| | <p>f. being a new customer to the retailer g. being a concession card or seniors card holder h. having solar panels, a smart meter, battery storage unit or swimming pool at the property i. being located in a limited geographic area as specified by the retailer j. having sufficient previous usage data at the premises to allow the retailer to calculate an estimate for the customers usage and price the plan accordingly</p> <p>52. Specific eligibility criteria apply to generally available plans and are separate from criteria for restricted plans, as described in clause 77.</p> <p>53. Incentives are not the same as eligibility criteria and should be treated as incentives as described in clauses 38-42</p> <p>Metering configurations and tariff type 60. Retailers must specify if the plan’s availability is subject to the customer’s property having a particular metering system or configuration.</p> <p>61. Each tariff type available with a plan is considered a separate plan and Energy Made Easy will generate separate plan documents for each metering configuration.</p> <p>Dual fuel plans 62. ‘Dual fuel plans’ are plans where prices or conditions offered are contingent on customers accepting the supply of both electricity and gas from the retailer. A plan can be a dual fuel plan even if the customer enters two separate contracts.</p> <p>63. Energy Made Easy will automatically allocate a plan ID to a dual fuel plan and create the plan documents.</p> <p>64. A dual fuel plan will be displayed as a single plan on the plan documents. Retailers must clearly indicate to customers in the data provided that the plan is contingent upon the customer accepting the supply of both electricity and gas from the retailer.</p> <p>Language requirements 65. Language requirements apply to information provided to Energy Made Easy for use on plan documents and in other</p> | | | | | |

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| | <p>advertising and/or marketing by retailers or their agents</p> <p>66. In addition to the requirements specified in Language requirements, retailers must use language that is clear, simple and widely understood.</p> <p>67. Terminology should be consistent across information provided to Energy Made Easy and in marketing and advertising where the meaning of the term is unchanged.</p> <p>68. Language requirements prescribes required terms for certain components of a plan and prohibits the use of other terms for plan documents and in advertising and/or marketing.</p> | | | | | |
| Clause 71-72 | <p>Energy Plan Documents</p> <p>71. Subject to clause 49, retailers must have available two documents (the plan documents) for each plan:</p> <p>a. Basic Plan Information Document (BPID) b. Detailed Plan Information Document (DPID).</p> <p>72. Energy Made Easy will generate the plan documents for each plan submitted by retailers to the retailer secure area of Energy Made Easy.</p> | TGR must not generate the plan documents; Energy Made Easy will generate them. | GM Retail | Ongoing | CEO | |
| Clause 79-105 | <p>When plan documents are required</p> <p>79. Retailers must have a BPID for every plan, including restricted plans.</p> <p>Requirements for generally available plans on retailer websites</p> <p>81. For each generally available plan retailers must:</p> <p>a. publishes in a prominent position a clear link to the BPID, labelled 'Basic Plan Information', where the retailer provides information about a plan on the retailer's or another website</p> <p>82. Retailers are not required to publish a DPID for a generally available plan separately on the retailer's website. A link to the DPID is provided in the BPID.</p> <p>Requirements for online sign up for generally available plans</p> <p>90. Customers must be able to access a link to the BPID as an initial step in any online search or sign-up process.</p> | <p>TGR must have a BPID for every plan.</p> <p>If TGR provides information about a plan on its website, TGR must have a link to the BPID on its website under the heading "Basic Plan Information".</p> <p>TGR is not required to publish DPID separately as a link to it will be contained within BPID.</p> <p>TGR must ensure a link to the BPID is available to customers when signing up online.</p> | GM Retail | Ongoing | CEO | |

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| | <p>91. Retailers must refer to the relevant BPID and provide a clear and prominent link to the BPID in close proximity to the reference where customers are signing up to a plan through an online sign-up process. This includes through third party sales channels such as comparison websites and utilities connection services.</p> <p><i>Requirements for in-person marketing activity</i></p> <p>93. During any door-to-door sales or other in-person marketing activity to a customer for any plan a retailer or its agent must provide the customer with:</p> <p>a. a BPID (which will contain a link to the DPID) at the time of contact and</p> <p>b. a hard copy of the DPID on request.</p> <p>94. A retailer does not need to provide the customer with a BPID and DPID if the door-to-door sales or other marketing activity ends promptly without any conversation in relation to prices or plans. For example, if the customer refuses to engage with the retailer or third party representing the retailer.</p> <p><i>Requirements for other marketing activities</i></p> <p>95. The obligations in this clause and clauses 96 and 97 relate to the marketing of generally available and restricted plans by any means, including but not limited to telemarketing activity, telephone queries, or other internet sales channels that relate directly or indirectly to:</p> <p>a. a retailer explaining plans in circumstances where the discussion relates to prices or discounts</p> <p>b. a retailer attempting to retain customers</p> <p>c. a retailer attempting to gain customers</p> <p>d. a retailer attempting to offer an additional energy type to customers – for instance marketing or discussions relating to bundled plans with customers that the retailer currently supplies with one fuel.</p> <p>96. In relation to the marketing of generally available plans, retailers must:</p> <p>a. advise the customer that the BPID is available on the retailer’s website (noting the relevant URL) or upon request and note that the BPID is an information sheet that contains all the key details about a plan and</p> | <p>TGR must ensure the link to the BPID is in close proximity to where customers are signing up online.</p> <p>When doing in-person marketing activities, TGR must provide customer with a hard copy of the BPID, and the DPID if requested.</p> <p>TGR does not need to provide BPID in person if marketing activity ends promptly without prices/plans being discussed.</p> <p>TGR must comply with the below requirements if wishing to advertise by other means (i.e. television):</p> <ul style="list-style-type: none"> - TGR must advise customer BPID is on website at *link* or upon request and explain what the BPID is; - TGR must sent BPID to customer upon request within 5 business days of the contract. | | | | |

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| | <p><i>b. at the customer’s request, send (via post or electronic communication) the BPID to the customer within five business days of the contact.</i></p> <p><i>Use of a marketing agent</i> 99. <i>Clauses 93 to 97 apply to in-person and other marketing by agents including third party comparator websites and utilities connection services.</i></p> <p><i>Publication requirements on mass media and social media</i> 100. <i>If a retailer or its agent markets generally available plans that reference prices, discounts, or the value of existing or potential plans for customers on mass media channels including magazines, the internet, newspaper or billboards, a retailer must include the following statement in any advertisements in clear and easily readable text:</i> a. <i>‘A Basic Plan Information Document for this plan is available at [insert link to the retailer/agent website where the BPID is located]’ or</i> b. <i>‘Basic Plan Information Documents are available at [insert link to the retailer/agent website where the BPID is located].’</i></p> <p>101. <i>The requirement in clause 100 extends to the promotion of plans through social media and advertisements on social media.</i></p> <p>102. <i>If a retailer advertises a plan online using a medium with character limitations that prevents the text required in clause 100 to be included, a retailer must include the text in a prominent location on the first webpage linked to in the advertisement.</i></p> <p><i>Price comparison websites and third-party sales agents</i> 103. <i>A link to the BPID must be provided for any marketing of generally available plans on third party price comparison websites or sales websites.</i></p> <p><i>Requirement to refer to plan ID in communication with customers</i> 104. <i>Retailers must be able to identify and refer to the EME generated plan ID in communications with customers. This means if a customer contacts or is contacted by a retailer or its agent about a plan and the customer refers to an Energy</i></p> | <p>TGR must ensure any marketing agent used complies with the above requirements.</p> <p>If TGR uses social media to market plans, it must use the words “a Basic Plan Information Document for this plan is available at *link*” in its advertisement.</p> <p>If advertisement medium has word limit, TGR must include the text required by clause 100 (above) on the first webpage linked to in the advertisement if it cannot be included in the advertisement itself.</p> <p>TGR must ensure third party websites used to market plans provide a link to the BPID.</p> <p>TGR must ensure they refer to the Energy Made Easy plan ID when communicating with customers.</p> | | | | |

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| | <p>Made Easy-generated plan ID the retailer or agent must be able to cross reference and identify the plan the customer is referring to based only on the plan ID.</p> <p>105. The retailer or agent should not have to ask for any additional information from the customer to identify the relevant plan.</p> | TGR should not have to ask for any information other than the Energy Made Easy plan ID when identifying which plan the customer is on. | | | | |
| Clause 106-110 | <p>Requirements for describing discounts in advertising and marketing</p> <p>106. If a retailer makes a representation in its marketing or advertising about a specific discount rate, that is, the amount and/or percentage of the discount, the retailer must also provide the information prescribed in clause 34. The exception for character-limited advertising or marketing in clause 102 also applies where relevant.</p> <p>109. In any advertising and/or marketing where a conditional discount is referred to a retailer must clearly state the conditions the customer must satisfy to receive the discount.</p> | <p>If TGR refers to discount in its advertisement about plans, TGR must also refer to the discount amount, what component of the bill the discount applies to (if % discount), base level tariff the discount applies to, where base level tariff information can be found on website, and which fuel the discount applies to (if dual fuel plan).</p> <p>TGR must state any conditions that apply to discount.</p> | GM Retail | Ongoing | CEO | |
| 2.8 Electricity Supply Industry Act 1995 | | | | | | |
| s 43D(4) | <p>(4) If a concession order applies in relation to a user cost, an authorised retailer (a) to which the order applies; and (b) that imposes the user cost on an eligible person to whom the order applies – must provide the concession to the eligible person.</p> | TGR must comply with <i>Electricity Supply Industry Concession Order 2016</i> (outlined below). | GM Retail | As required | CEO | |
| 2.9 Electricity Supply Industry Concession Order 2016 | | | | | | |
| s 4 | <p>Life support concession (3) A person is, on a day, eligible for the life support concession in respect of residential premises if – (a) the premises are on that day the principal place of residence of the person; and (b) the person on that day either – (i) requires an approved home-based life support machine at the premises; or (ii) resides at those premises with another person who requires an approved home-based life support machine at the premises; and (c) the authorised retailer who supplies electricity to the premises has been notified, on or before that day, that the person is eligible for the life support concession in respect of</p> | <p>TGR must provide life support concession to a person if they are eligible: premises is principal place of residence, approved-home based life support machine (below) is required at premises (or person is eligible surviving spouse), TGR has received accurately completed application form from person, and it has not been more than 4 years since TGR received application from person.</p> <p>The approved home based life support machines and rates daily discount amounts are:</p> <ul style="list-style-type: none"> • Oxygen concentrator, 116.707 cents per day • Peritoneal dialysis machine, 86.590 cents per day • Haemo-dialysis machine, 86.590 cents per day • Chronic positive pressure and airways regulator, | GM Retail | As required | CEO | |

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| | <p>the premises; and</p> <p>(d) the day is not more than 4 years after the day on which the person (or, if the person is a surviving spouse, of a deceased person, to whom subclause (5) applies, the deceased person) submitted to the authorised retailer an application, referred to in subclause (4) claiming the life support concession.</p> <p>(7) An authorised retailer that issues to a person an electricity account in relation to the supply of electricity to residential premises during a period is required to provide to the person the life support concession in respect of the premises for each day, during that period, on which the person is, under subclause (2), an eligible person in respect of the premises.</p> | <p>41.412 cents per day</p> <ul style="list-style-type: none"> Continuous positive airways pressure machine, 41.412 cents per day Respirator (iron lung), 154.354 cents per day Combination oxygen concentrator and chronic positive pressure and airways regulator, 158.119 cents per day Phototherapy machine, 219.930 cents per day Left ventricular assist device, 41.412 cents per day | | | | |
| s 5 | <p>Medical cooling or heating concession</p> <p>(3) A person is, on a day, eligible for the medical cooling or heating concession in respect of residential premises if –</p> <p>(a) the premises are on that day the principal place of residence of the person; and</p> <p>(b) the person is on that day the holder of a current pensioner concession card or a current health care card; and</p> <p>(c) the person, or a person with whom the person lives, has, in accordance with clause 6, a recognised medical need on that day for the premises in which the person resides to be heated or cooled; and</p> <p>(d) the authorised retailer who supplies electricity to the premises has been notified, on or before that day, that the person is eligible for the medical cooling or heating concession in respect of the premises; and</p> <p>(e) the day is not more than 4 years after the day on which the person (or, if the person is a surviving spouse, of a deceased person, to whom subclause (5) applies, the deceased person) submitted to the authorised retailer an application, referred to in subclause (4), claiming the medical cooling or heating concession.</p> <p>(7) An authorised retailer that issues to a person an electricity account in relation to the supply, during a period, of electricity to residential premises is required to provide to the person the medical cooling or heating concession in respect of the premises for each day, during that period, on which the person is, under subclause (2), an eligible person in respect of the premises.</p> <p>(8) The medical cooling or heating concession for a day is 47.163 cents.</p> | <p>TGR must provide medical cooling or heating concession to a person if they are eligible: premises is principal place of residence, person is eligible surviving spouse or holds a Services Australia or DVA Pensioner Concession Card, or a Services Australia Health Care Card, person has a recognised medical need (medical certification), TGR has received accurately completed application form from person, and it has not been more than 4 years since TGR received application from person.</p> <p>The concession is 47.163 cents a day.</p> | GM Retail | As required | CEO | |

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| s 7 | <p><u>Annual electricity concession</u></p> <p>(3) A person is, on a day, eligible for the annual electricity concession in respect of residential premises if –</p> <p>(a) the premises are on that day the principal place of residence of the person; and</p> <p>(b) the person is on that day –</p> <p>(i) the holder of a current pensioner concession card; or</p> <p>(ii) the holder of a current health care card; or</p> <p>(iii) the holder of a specified bridging visa; or</p> <p>(iv) a person to whom a current residence determination relates; and</p> <p>(c) the authorised retailer who supplies electricity to the premises has been notified, on or before that day, that the person is eligible for the annual electricity concession in respect of the premises.</p> <p>(7) An authorised retailer that issues to a person an electricity account in relation to the supply, during a period, of electricity to residential premises is required to provide to the person the annual electricity concession in respect of the premises for each day, during that period, on which the person is, under subclause (2), an eligible person in respect of the premises.</p> <p>(9) The annual electricity concession for a day is 157.460 cents.</p> | <p>TGR must provide the annual electricity concession to a person if they are eligible: premises is principal place of residence, person is eligible surviving spouse or holds a Services Australia or DVA Pensioner Concession Card, Services Australia Card or Immi Card (Bridging Visa E), and TGR has received accurately completed application form.</p> <p>The concession is 157.460 cents a day.</p> | GM Retail | As required | CEO | |
| s 8 | <p><u>Provision of concessions</u></p> <p>(1) A concession that is required under this order to be provided to a person in respect of an electricity account issued to the person is to be provided to the person –</p> <p>(a) by way of a deduction from, or a reduction of, the amount that, but for the concession, would have been charged to the person in the electricity account; or</p> <p>(b) by way of a refund to the person of the amount of the concession.</p> <p>(2) A concession that is required under this order to be provided to a person in respect of the supply of electricity to residential premises to which a prepayment meter system account relates is to be provided to the person –</p> <p>(a) by way of a deduction from, or a reduction of, the amount that, but for the concession, would have been charged for the supply; or</p> <p>(b) by way of a refund to the person of the amount of the concession.</p> <p>(3) An authorised retailer is not entitled, on the grounds that</p> | <p>TGR must provide concession/s in form of a deduction or refund and must not reduce the amount of concession payable if person is eligible for more than one type of concession.</p> | | | | |

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| | <i>another concession is payable under this order to a person, to reduce the amount of a concession payable to the person.</i> | | | | | |
| 2.10 Complaints and Dispute Resolution Policy - based upon the guiding principles contained in AS/NZS 10002:2018 - Guidelines for complaint management in organisations | | | | | | |
| Clause 3 | <p>Enabling complaints</p> <p>People focus</p> <p>Ensuring no detriment to complainant</p> <p>Visibility and transparency</p> <p>Accessibility</p> <p>No charges</p> | <p>TGR has a strong commitment to excellent customer service. The experienced customer service team are people-focused and proactive in seeking and receiving feedback and complaints.</p> <p>The highly trained team handle complaints respectfully and fairly ensuing complainants are not adversely affected because of a complaint they have made.</p> <p>Details of the complaints handling process are contained in the Customer Charter and on the TGR website.</p> <p>There are no charges for making a complaint.</p> | All staff | As required | GM Retail | BMSDOC-18-1350 |
| Clause 4 | <p>Managing complaints</p> <p>Responsiveness</p> <p>Objectivity and fairness</p> <p>Equity</p> <p>Privacy and disclosure</p> <p>Communication</p> | <p>TGR receives all verbal communications through our single free-call phone number, which is published in all promotional information, the Customer Charter and on invoices. Complaints received on this number are managed firstly by the trained customer services team. TGR's published aim is to resolve phone complaints at the initial contact and written complaints within 5 business days.</p> <p>As with all customer enquiries security checks are made with the enquirer before discussing the account and the customer's privacy is acknowledged and maintained throughout.</p> <p>In the event the customer services team cannot resolve the issues raised, they are directed to the GM Retail.</p> <p>Standard letters have been prepared to facilitate rapid response to complaints.</p> <p>All customers are informed of their right to refer complaints to the Tasmanian Ombudsman, if they are not satisfied with the response from TGR.</p> | Team Leader | As required | GM Retail | BMSDOC-18-1350 |
| Clause 5 | <p>Managing the parties</p> <p>Conduct of the parties</p> <p>Work health and safety</p> <p>Complaint involving multiple parties</p> <p>Empowerment of staff</p> | <p>TGR has established complaints register within our electronic records system. All complaints are registered in these files. Actions and resolution times are recorded as part of the record system. The register is reviewed monthly by the GM Retail. A copy is sent to the CEO on a monthly basis.</p> <p>Customer services staff have the authority and expertise to handle most complaints including where necessary the right to</p> | Team Leader | As required | GM Retail | BMSDOC-18-1350 |

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| | | <p>manage unreasonable conduct by the complainant.</p> <p>Any issues arising from a complaint are dealt with immediately they arise, and issues of a more general nature can be raised at the fortnightly team meetings.</p> <p>In addition to internal processes the staff have access to external Employee Assistance, Conflict Management and Counselling Services.</p> | | | | |
| Clause 5.4 | <p>Accountability, learning and prevention</p> <p>Accountability</p> <p>Continuous improvement</p> <p>Prevention of ongoing disputes</p> | <p>Processes are in place to minimize complaints where possible including clear, effective and proactive customer management and communication.</p> <p>All customer services staff are authorized to offer payment plans or identify and refer hardship customers to external organisations for assistance.</p> <p>Staff are authorized to offer advice on bill minimization and energy efficiency to reduce “bill shock” and subsequent complaints. The website has information on energy saving tips.</p> <p>TGR reviews the complaints register monthly and addresses any recurring issues as they arise and to minimize complaint escalation.</p> | GM Retail | Monthly | CEO | |



Compliance Plan TGR – Electricity (Tas)

Legal Compliance Policy

23 September 2022

Version 9.0

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|---------------------------------|--|
| Document Number | BMSDOC-18-652 |
| Document Owner Secretary | General Counsel and Company Secretary |
| Due Date for Review | 23/09/2023 |

Department Review Required by:

- | | |
|---|---|
| <input type="checkbox"/> CEO | <input type="checkbox"/> Retail |
| <input type="checkbox"/> Finance | <input type="checkbox"/> People and Culture |
| <input type="checkbox"/> Engineering & Operations | <input type="checkbox"/> Commercial & Business Development |
| <input type="checkbox"/> Health, Safety and Environment | <input checked="" type="checkbox"/> General Counsel & Company Secretary |

Applicable to:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Tas Gas Holdings | <input checked="" type="checkbox"/> Tas Gas Retail |
| <input checked="" type="checkbox"/> Tas Gas Networks | <input checked="" type="checkbox"/> Gas Pipeline Victoria |
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Document History

| Version No. | Version Date | Description of Change |
|-------------|-------------------|--|
| 1.0 | September 2011 | New document. |
| 2.0 | February 2012 | 3.4 amended (refer to Sect 2.1, not Sect 6). |
| 3.0 | March 2015 | Insert Works' Manual table, Properties, and update Definitions table. New text in Section 4.3. |
| 4.0 | January 2016 | Transferred to new Brookfield template. |
| 5.0 | July 2017 | Content review and minor wording update; revised diagram in section 5.0. |
| 6.0 | February 2018 | Reviewed against AS 19600 following recommendations of independent appraisal report. |
| 7.0 | 06 January 2021 | Tas Gas template. |
| 8.0 | 23 June 2021 | Format updated. |
| 9.0 | 23 September 2022 | Updated department and Tittles. |

References

Cited in this Document

| Title | Document Number |
|-------------------------------------|------------------------------|
| Code of Conduct and Business Ethics | Corporate Services intranet |
| Code of Conduct Policy | BMSDOC-18-378 |
| Corrective Action Register | Safety & Compliance intranet |
| Document Control Procedure | BMSDOC-18-421 |
| Employee Handbook | Corporate Services intranet |

Additional Reading

| Title | Document Number |
|--|-------------------|
| Compliance Management Systems - Guidelines | AS ISO 19600:2015 |
| Compliance Management System (TGN) | BMSDOC-18-842 |
| Compliance Management System (EVN) | BMSDOC-18-1421 |
| Compliance Management System (TGR) | BMSDOC-18-1447 |

1. SCOPE

This policy applies to Tas Gas Holdings Pty Ltd and its subsidiaries, hereinafter referred to as 'Tas Gas', and all employees, contractors and sub-contractors as appropriate.

This policy, together with the compliance management system applicable to each entity, ensures effective governance and conformance with regulatory requirements and the company's legal and compliance framework.

2. PURPOSE AND APPLICATION

Tas Gas recognises that an important part of achieving its strategic direction is to have an effective system of governance, which includes conducting activities in accordance with their policies, procedures, and the law, to enhance community confidence and their owners in the management of their assets.

To meet this commitment, Tas Gas will maintain the highest standards of diligence in all areas of accountability via a robust Compliance Management System (CMS); position descriptions; ongoing education, training, and development; regular internal audits and inspections; and in the promotion of a 'compliance culture'.

2.1 Compliance Framework

Compliance is accomplished through the following means:

- Federal and state legislation, international, Australian, and other standards and related industry guidelines are monitored through subscription to online services such as Lawlex and SAI Global Standards Watch or other appropriate industry memberships and by close liaison with the regulators. Changes to legal and other requirements will be communicated to the business and relevant documentation and training materials reviewed and updated as required.
- A business management system comprising a controlled document store; specified intranet and cloud-based document storage; and archive library which is managed by a dedicated document controller and is accessible by all staff. Revision details and review timetables are communicated weekly to staff.
- A workflow approval process requires managers to approve documentation produced by their teams to ensure consistency and compliance. These documents may include reference to legislation, standards and industry practices associated with the scope of works and are subject to the requirements of the *Document Control Procedure* (BMSDOC-18-421).
- Managers may consult, where applicable, with other teams during the document development or approval process. This will be reflected in the "Review Required by" section of the document and will include the Safety & Compliance team if specific compliance advice is required.
- The Safety & Compliance Manager oversees the document development and review process via the weekly approved document list to ensure that a legislative compliance review has been conducted.
- The internal audit process will review legislative compliance in relation to document content and to the implementation of, and compliance with, those documents prior to, during and after operational activities are undertaken.
- External auditors conducting compliance and license approval audits will consider the effectiveness of the above procedures.
- Staff are required to "live" the company values which include behaviours to ensure compliance such as "Do what's right" with the sub-descriptors of "Act with Integrity" and "Work to a Professional Standard" and to report any non-compliance to the appropriate person as soon as possible.
- Corrective actions arising from audits or other reporting means are recorded in the Corrective Action Register and monitored through to timely completion.

- Training is provided on a regular basis to support compliance awareness and competence. Annual presentations, re-inductions and online refresher modules are included. Training may also be included as a corrective action to address non-compliance issues.

3. POLICY STATEMENT, OBJECTIVES AND PRINCIPLES

Tas Gas is committed to complying with all relevant legislation and obligations and seeks to promote a culture of effective and sustainable corporate governance and compliance practices. Tas Gas has developed Compliance Management Systems (CMS) for each entity based on the Australian and International Standard (AS/ISO 19600:2015 Compliance Management Systems - Guidelines) to ensure the following:

- The highest standards of ethics and compliance with all applicable laws, regulations, rules, and policies are maintained.
- Compliance is embedded into the culture of the organisation.
- Compliance is integrated within the financial, risk, quality, safety and environmental management processes and operational requirements and procedures.

Each CMS is based upon the principles of good governance, proportionality, transparency, and sustainability and includes the following objectives:

- Compliance obligations are identified and assessed for mitigation.
- Compliance and risk are managed at the operational level, with accountability through defined reporting structures.
- Staff training needs are identified and addressed.
- Behaviours that create and support compliance are encouraged and behaviours that compromise compliance are not tolerated.
- Controls to manage key compliance obligations and achieve desired outcomes.
- A demonstration that the CMS is interwoven throughout documentation and practice.
- A commitment to regular review and continual improvement.

4. INDEPENDENCE AND AUTONOMY OF THE COMPLIANCE FUNCTION

The Safety & Compliance team provides a dedicated compliance resource comprising of the Manager and the safety and compliance officers (Compliance Function) to assist in the development of a comprehensive suite of policies and plans to make compliance easily understood and achievable. Safety & Compliance maintains a schedule of compliance audits and has adopted the parent company's internal audit reporting framework, which can be applied to TGN's activities to highlight areas requiring improvement.

The Compliance Function is independent from the other teams within TGN and reports directly to the CEO. This independence enables the Compliance Function to provide an independent and unbiased view when assisting TGN to meet its compliance needs.

5. RESPONSIBILITY FOR MANAGING AND REPORTING COMPLIANCE ISSUES

5.1 General Responsibilities

The contact person for information on this policy is the Safety & Compliance Manager.

All employees must promote the highest standards of ethical business conduct, obey all laws and regulations as well as company policies and procedures, and embed the company values into their daily work.

5.2 Specific Responsibilities

The overall responsibilities and accountabilities for ensuring compliance are set out in detail in the CMSs. The specific responsibilities for managing and reporting compliance issues are set out below:

All Employees must:

- ensure they “Do what’s right” at all times.
- report compliance anomalies and potential compliance improvements to their manager for resolution and consideration.
- cooperate fully with any investigations and/or resolutions of non-compliance incidents.

Management must:

- be open and available to any team member wishing to report actual or potential non-compliance.
- ensure a report of any non-compliance is forwarded to the Compliance Function.
- assist the Compliance Function with any actions required to record, report, or investigate non-compliance incidents.

The Compliance Function must:

- maintain a register of compliance failures including actions taken to prevent recurrence.
- ensure that material compliance failures are immediately reported to the Board or external party (e.g., Regulator) as appropriate.
- provide reports to the Regulators in the timelines state in their reporting guidelines on non-compliance and resolution.
- facilitate the investigation and resolution of non-compliance incidents.
- liaise directly with regulators.
- ensure audit and appraisal reports are provided to Managers, the CEO, and the Board.

The CEO must:

- ensure the company values are embedded in the company’s activities.
- regularly communicate the absolute requirement to “Do what’s right” at all times.
- review non-compliance reports and the resolution process.
- participate with investigations and/or resolutions of non-compliance incidents as required.
- liaise directly with regulators in relation to serious non-compliance issues.
- ensure the Board is appropriately advised of non-conformance issues.

The Board must:

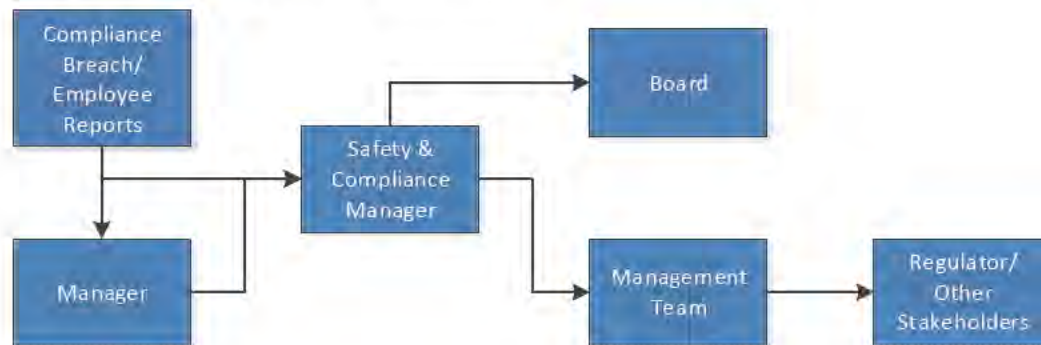
- oversee the implementation and review of internal compliance and control systems.
- scrutinise compliance performance.
- review and, if required, act upon reports of non-compliance.
- review management’s position regarding compliance in the regularly provided compliance reports.
- review appraisal and audit reports by regulatory agencies and any compliance auditor observations.
- review and consider reports concerning actual and suspected breaches of law, including fraud and theft, and assessing systems to manage these risks.

5.3 Compliance Reporting Process

Where required by the Regulator, reports are submitted to the Regulator and these may also be subject to internal audit. Reports will be submitted in accordance with the timelines set out by the Regulator and may include:

- the status of compliance with external legislative compliance obligations, including any instances of compliance failure and the remedial action taken
- the status of the CMS and the level of compliance across the company
- a continuous improvement perspective regarding systems development.

The compliance reporting process is shown below:



5.4 Records Management

All records relevant to this document are maintained in the Controlled Document Store.

6. STAKEHOLDER MANAGEMENT

The principles on which relationships with internal and external stakeholders will be managed are based on company values and include:

- open, honest, transparent, and inclusive interactions with all parties
- proactive and timely communication, reporting and resolution
- relevant and accurate information sharing.

7. STANDARDS OF CONDUCT AND ACCOUNTABILITY

The required standards of conduct and accountability are set out in the *Code of Conduct Policy* (BMSDOC-18-378) and in the *Tas Gas Code of Conduct and Business Ethics*. The company values define the behaviours expected of all employees.

- All staff undergo Code of Conduct training when they join the company and thereafter as an annual refresher.
- The *Code of Conduct Policy*, *Tas Gas Code of Conduct and Business Ethics* and the *Employee Handbook* are available on the Intranet to all employees.
- The company values are widely circulated and visible throughout offices and intranet.

All instances of non-compliance are investigated in accordance with company policies and code of conduct and ethics.

COMPLAINTS AND DISPUTE RESOLUTION POLICY



Purpose

This policy is intended to ensure that we handle complaints fairly, efficiently and effectively.

Our complaint management system is intended to:

- Enable us to respond to issues raised by customers making complaints in a timely and cost-effective way
- Boost customer confidence in our processes
- Provide information that can be used by us to deliver quality improvements in our products, services, staff and complaint handling.

This policy provides guidance to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

Scope

This policy applies to Tas Gas Holdings Pty Ltd and its subsidiary companies. It applies to all staff receiving or managing complaints from customers regarding our products and services.

Commitment

This company expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

CEO of Tas Gas

Promote a culture that values complaints and their effective resolution.

- Report publicly on Tas Gas's complaint handling.
- Provide adequate support and direction to key staff responsible for handling complaints.
- Regularly review reports about complaint trends and issues arising from complaints.
- Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.
- Encourage staff to make recommendations for system improvements.
- Recognise and reward good complaint handling by staff.
- Support recommendations for product, service, staff and complaint handling improvements arising from the analysis of complaint data.

Manager responsible for complaint handling

Establish and manage our complaint management system.

- Provide regular reports to the CEO on issues arising from complaint handling work.
- Ensure recommendations arising out of complaint

data analysis are canvassed with the CEO and implemented where appropriate.

- Recruit, train and empower staff to resolve complaints promptly and in accordance with Tas Gas's policies and procedures.
- Encourage staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system.
- Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.
- Recognise and reward good complaint handling by staff.

Staff whose duties include complaint handling

Demonstrate exemplary complaint handling practices.

- Treat all people with respect, including people who make complaints.
- Assist people to make a complaint, if needed.
- Comply with this policy and its associated procedures.
- Keep informed about best practice in complaint handling.
- Provide feedback to management on issues arising from complaints.
- Provide suggestions to management on ways to improve the organisation's complaints management system.
- Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.

All staff

Understand and comply with Tas Gas's complaint handling practices.

- Treat all people with respect, including people who make complaints.
- Be aware of Tas Gas's complaint handling policies and procedures.
- Assist people who wish to make complaints to access the Tas Gas's complaints process.
- Be alert to complaints and assist staff handling complaints resolve matters promptly.
- Provide feedback to management on issues arising from complaints.
- Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.

Definitions

Tas Gas: Tas Gas Holdings Pty Ltd includes, but is not limited to, the following subsidiaries:

- Tas Gas Holdings Pty Ltd (TGH)

- Gas Holdings Tasmania (GHT)
- Tas Gas Networks Pty Ltd (TGN)
- Tas Gas Retail Pty Ltd (TGR)
- Gas Networks Victoria Pty Ltd (GNV)
- Gas Pipeline Victoria PTY Ltd (GPV)

Complaint: Expression of dissatisfaction made to or about us, our products, services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

Complaint Management System: All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

Policy: A statement of instruction that sets out how we should fulfil our vision, mission and goals.

Procedure: A statement or instruction that sets out how our policies will be implemented and by whom.

Guiding Principles

STEP 1: FACILITATE COMPLAINTS

STEP 2: RESPOND TO COMPLAINTS

STEP 3: MANAGE THE PARTIES TO A COMPLAINT

Facilitate Complaints

People focus

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.

People making complaints will be:

- Provided with information about our complaint handling process
- Provided with multiple and accessible ways to make complaints
- Listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate
- Provided with reasons for our decisions/s and any options for redress or review

No detriment to people making complaints

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

Accessibility

Information about how to make a complaint must be easily accessible for a customer, including information on this policy.

We will also provide customers with information on their right to contact the Energy & Water Ombudsman in their state at any time for independent advice and information, as well as to complain to the Ombudsman if they are dissatisfied with our handling of their complaint or dispute. The Ombudsman's contact details are on our website.

Customers who are deaf, or have a hearing impairment may contact us to make a complaint via the National Relay Service, the following details are also published on our website and on customer bills:

- TTY users phone [133 677](tel:133677) then ask for [1800 750 750](tel:1800750750)
- Speak and Listen users phone [1300 555 727](tel:1300555727) then ask for [1800 750 750](tel:1800750750)
- Internet relay users [connect to the NRS](#) then ask for [1800 750 750](tel:1800750750)
- SMS Relay text [0423 677 767](tel:0423677767)

For customers who wish to use an interpreter service to make a complaint to us can call TIS National on [131 450](tel:131450). This number is also published on our website and on customer bills.

No charge

Complaining to us is free.

Respond to Complaints

First call resolution

Where possible, complaints will be resolved at first contact with Tas Gas.

Responsiveness

We will promptly acknowledge receipt of complaints.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter poses an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible of the following:

- Complaints process
- Expected time frames for our actions
- Progress of the complaint and reasons for any delay
- Their likely involvement in the process
- Possible or likely outcome of their complaint

Objectivity and fairness

We will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how

a complaint was managed will be conducted by a person other than the original decision maker.

Responding flexibly

Our staff are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as much as possible.

Confidentiality

We will protect the identity of people making complaints where this is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by Tas Gas as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

Manage the Parties of a Complaint

Complaints involving multiple organisations

Where a complaint involves multiple organisations, we will work with the other organisation/s, where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of service providers.

Complaints involving multiple parties

When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

Empowerment of staff

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- Our ability to do our work and perform our functions in the most effective and efficient way possible
- The health, safety and security of our staff

- Our ability to allocate our resources fairly across all the complaints we receive

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

Complaint Management System



Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in our complaint management system are set out below.

Receipt of complaints

We will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- The contact information of the person making the complaint
- Issues raised by the person making the complaint and the outcome/s they want
- Any other relevant information
- Any additional support the person making the complaint requires

Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly and preferably within 5 working days.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making the complaint.

Initial assessment and addressing of complaints

Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there

is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider the following:

- How serious, complicated or urgent the complaint is.
- Whether the complaint raises concerns about people's health and safety.
- How the person making the complaint is being affected.
- The risks involved if resolution of the complaint is delayed.
- Whether a resolution requires the involvement of other organisations.

Addressing Complaints

After assessing the complaint, we will consider how to manage it, which may include the following:

Give the person making the complaint information or an explanation.

- Gather information from the product, person or area that the complaint is about
- Investigate the claims made in the complaint

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. The actions we decide to take will be tailored to each case and will take into account any statutory requirements for providing reasons for decisions.

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- The outcome of the complaint and any action we took
- The reason/s for our decision
- The remedy or resolution/s that we have proposed or put in place
- Any options for review that may be available to the complainant, such as an internal review, or external review to the independent Ombudsman.

Closing the complaint, record keeping, redress and review

We will keep comprehensive records about:

- How we manage the complaint
- The outcome/s of the complaint including whether it or any aspect of it was substantiated, and recommendations made to address problems identified and any decisions made on those recommendations
- Any outstanding actions that need to be followed up

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

Alternative avenues for dealing with complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Accountability and Learning

Analysis and Evaluation of Complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

- The number of complaints received
- The outcome of complaints, including matters resolved at the frontline
- Issues arising from complaints
- Systemic issues identified
- The number of requests we receive for internal and/or external review of our complaint handling

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to the CEO and senior management for review.

Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- Ensure its effectiveness in responding to and resolving complaints
- Identify and correct deficiencies in the operation of the system

Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

Continuous improvement

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- Support the making and appropriate resolution of complaints
- Implement best practices in complaint handling
- Recognise and reward exemplary complaint handling by staff
- Regularly review the complaints management system and complaint data
- Implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

COMPLAINTS AND DISPUTE RESOLUTION PROCEDURE (TGR)



1. GENERAL

1.1 Scope

This procedure applies to Tas Gas Retail (TGR), a subsidiary of Tas Gas Holdings Pty Ltd.

1.2 Objective

The objective of this procedure is to ensure TGR and its Customer Service Representatives (CSRs) adheres to:

- The principals set out in the Complaints and Dispute Resolution Policy; and
- Manage a customer's dissatisfaction with services in a way that keeps the interests of the customer at the forefront of TGR's operations.

To assist CSRs, this Procedure sets out the methodology for handling, recording, tracking, communicating, and resolving complaints in a timely manner.

1.3 Definitions

Tas Gas: Tas Gas Holdings Pty Ltd includes, but is not limited to, the following subsidiaries:

- Tas Gas Holdings Pty Ltd (TGH)
- Tas Gas Networks Pty Ltd (TGN)
- Tas Gas Retail Pty Ltd (TGR)
- Gas Networks Victoria Pty Ltd (GNV)
- Gas Pipeline Victoria PTY Ltd (GPV)

CSRs: Customer Service Representatives

HSE: Health Safety and Environment

Gentrack: Gentrack Velocity, TGR's customer billing and account management system

GM: General Manager

2. THE COMPLAINT PROCESS

2.1 Initial Registration

CSRs are the main point of contact for complaints via phone, letter or email. When a CSR receives a complaint¹ through any of these means, they will follow the below steps:

1. Establish whether the complaint relates to a service provided by TGR or TGN (if TGN, follow below steps as well as refer to 2.5).
2. Once established, record complaint against the customer's account in Gentrack through creating a complaint record.

Note: if a person making the complaint is not a TGR customer, the CSR will still create a complaint record in the TGR internal account and complete the following details as prompted:

- Complaint Source
- Complaint Type
- Complaint About
- Billing Complaint Type (if a Billing complaint)
- Full Issue Description (please complete as much detail as possible)
- Attachments (attach copies of any documentation, etc)
- FINISH

3. If the complaint **can** be resolved to the customer's satisfaction during the initial contact, can close the complaint,

Note: If as part of the resolution the customer requests confirmation in writing, a Resolution Confirmation Letter will be sent in line with the customer's chosen method of communication and saved to the customer's account (i.e. if complaint is received via email, response to be sent by email, etc).

4. If the complaint **cannot** be resolved, will immediately record details of the next steps required in the Gentrack record, as well as track any actions already taken.

¹ A complaint is defined as being:
"An expression of dissatisfaction with a specific action or service of an agency, including the failure by an agency to comply with its public service charter or mission."

Note. Please see the Good Practice Guide, the Victorian Ombudsman's Guide to Complaint Handling for Victorian Public-Sector Agencies and Australian Standard AS/NZS

10002-2014 - Guidelines for complaints management in organisations. This guide is based on the current Australian Standard. This guide helps educate and embed how best we can manage and support our valued customers with complaints.

2.2 Complaint Monitoring

Once the complaint has been recorded against the customer's account, it will be visible to all TGR staff including the Team Leaders, Customer Service & Operations Manager and GM Retail.

The CSR will notify either the Customer Service Team Leader or Billing Team Leader (whichever is applicable) advising a complaint has been received.

The CSR will monitor progress of the complaint via the customer's account, using notes and follow up dates.

2.3 Updating the Complaint

Any updates to the complaint will be recorded in the complaint record so that progress of the complaint can be monitored and escalation can take place if necessary.

If letters or other documentation are provided in relation to the complaint, copies will be saved to the complaint record in the customer's account.

2.4 Completion within 5 Working Days

TGR aims to have a completion turnaround of 5 business days unless elevated to the relevant Ombudsman.

All efforts should be made to ensure complaints are resolved to the customer's satisfaction within 5 business days, and without the need for the complainant to escalate the issue to the relevant Ombudsman.

Once the complaint is resolved, the complaint record in the customer's account will be updated with the close out date, and the open service order will also be closed. Details of all actions and the resolution will be recorded in the complaint record in the customer's account.

2.5 Closing Complaint

Before a complaint is closed, TGR will ensure the outcome/s of the complaint is recorded in the complaint record in the customer's account, including:

- Whether the complaint or any aspect of it was substantiated;
- Recommendations made to address problems;
- Any decisions made on recommendations; and
- Outstanding actions that need to be followed up

Where there are outstanding actions that need to be followed up, these will be diarised in the TGR calendar and assigned to a member of the TGR Management Team for oversight.

2.6 Complaint by TGR customer about TGN

If a complaint is received from a TGR customer about TGN's operations, the complaint will still be registered in the customer's TGR record and TGR will ensure it is resolved (following steps in 2.1 above). A CSR will also follow the below steps:

1. Advise customer the complaint is in relation to TGN and obtain the customer's consent to provide TGN with their name, contact details and details of the complaint (including convenient times to be

contacted about the complaint). The consent will be recorded as part of the complaint description.

2. Once customer's consent is obtained, record consent in complaint record in customer's account and pass the above details onto TGN.
3. Advise customer TGN will respond directly when it is practicable for them to do so.
4. If customer states they want to contact TGN directly, advise them to contact the TGN Health Safety & Environment (HSE) team via the relevant Tasmanian or Victorian email address or by phoning 03 6336 9350, or alternatively offer to transfer the complainant to the TGN HSE team for action.
5. Always forward any details relating to the complaint to:
 - o complaintstgn@tasgas.com.au for Tasmanian complaints; or
 - o gnvcomplaints@tasgas.com.au for Victorian complaints

2.7 Complaint by person who is not TGR customer

If a complaint is received from a person that is not a customer of TGR, the complaint will still be registered in the TGR internal account (following steps in 2.1 above). A CSR will also follow the below steps:

1. If the complainant is a gas consumer, advise them to contact their gas retailer to register their complaint.
2. If the complainant is not a gas consumer, but they have a complaint in relation to the gas network, advise them to contact the TGN HSE team via the relevant Tasmanian or Victorian email address at 2.5 above or by phoning 03 6336 9350, or alternatively offer to transfer the complainant to the TGN HSE team for action.

2.8 Ombudsman Cases

If a customer's case is elevated to the relevant Ombudsman, the Ombudsman will formally contact TGR. This is usually via an initial telephone call to either the GM Retail or the TGN HSE team informing them of the complaint and requesting information. Depending on the nature of the complaint, this may be followed subsequently with further communication from the Ombudsman requesting information or setting out actions to be taken.

As with any complaint, the complaint will still be registered in the customer's TGR record and TGR will ensure it is resolved (follow steps in 2.1 above). A CSR will also ensure the following steps are undertaken:

1. If the customer is a TGR customer, inform the TGR Management Team, together with the relevant action to be undertaken.
2. If the customer is a TGR customer, record any details received from the Ombudsman in the customer's account.
3. Respond to all requests for information from the Ombudsman as a priority, and provide information either directly to the Ombudsman via email within

1 business day of receiving the request, or via the Manager HSE if requested to do so.

4. Add all subsequent information received in relation to the complaint to the complaint record in the customer's account so that the TGR Management Team are able to track progress of the complaint.
5. Once the TGR Management Team receives notification from the Ombudsman that the complaint has been resolved to the Ombudsman's satisfaction, notify all relevant parties the case can be closed.
3. If the close out date for the complaint is greater than 5 business days from the date of receipt of the complaint, record the reasons in the complaint details.

2.9 Ombudsman Cases

Any correspondence addressed to customers or other parties in relation to a complaint will first be approved by the Customer Services & Operations Manager before sent, and saved to the complaint record in the customer's account.

2.10 Outcome

TGR will follow the *Complaints and Dispute Resolution Policy* and *Complaints Procedure Flow Chart*, ensuring that valued customers, team, and business partners are carefully managed and kept informed of the progress of their complaint.

Success will be measured by resolving all complaints within 5 business days of receipt of the complaint and without the need to involve external mediators.



RISK MANAGEMENT POLICY

Tas Gas Holdings Pty Ltd recognises that risk management is an essential tool for sound strategic, financial and operational planning and management. To promote this, risk management principles are integrated into our planning, change and operational activities to ensure risks are identified, assessed and managed appropriately. To demonstrate our commitment, we will implement and maintain the following requirements.

- An Enterprise Risk Management Framework consistent with AS/NZS ISO 31000:2018 Risk management – Guidelines and Tas Gas’s Risk Management Framework will be maintained, supporting our commitment to effectively managing risk, governance and compliance.
- We will consider strategic, operational, safety, financial, environmental, regulatory compliance and reputational aspects when identifying, assessing, evaluating and treating risks.
- Our Work Health and Safety and Environmental Management Systems will ensure compliance with AS/NZS ISO 45001 Occupational health and safety management systems, AS/NZS/ISO 14001 Environmental Management Systems and other industry standards for managing work health and safety and environmental risks.
- All workers and providers are integral to effective risk management and are expected to identify, report and participate in mitigating potential risk exposures and liabilities.
- Risk assessments will be conducted for all key activities, functions and responsibilities and all work health and safety risks will be reduced to ‘as low as reasonably practicable’ (ALARP).
- A risk register will be maintained, with risk profiles developed and risk plans implemented.
- Where significant risk exposures are evident, we will actively communicate with relevant stakeholders, eliminate or minimise detrimental impacts and monitor for changing conditions.
- We will ensure that relevant and current acts, regulations, codes and standards are recognised as the minimum acceptable requirements.
- We will ensure continuity of services by developing and maintaining viable contingency plans and disaster recovery capacities for key services.
- Training, communication and competency are key aspects we will emphasise to support informed decision-making and appropriate responses to managing risks.
- Risk management is a priority. We will ensure that adequate resources are available to support, assess and improve our risk management practices across the organisation and its activities.

Phaedra Deckart
Chief Executive Officer



The Directors
Tas Gas Holdings Pty Ltd
5 Kiln Court
St Leonards TAS 7250

24 October 2022

Dear Directors,

Tas Gas Holdings Pty Ltd
Audited financial statements for the year ended 30 June 2022

We draw your attention to the last audited financial statements of Tas Gas Holdings Pty Ltd (the "Financial Statements") which were signed on 17 October 2022. These financial statements contained a solvency declaration in the Director's Declaration, as required by the *Corporations Act 2001*, that "in the opinion of the Directors, there are reasonable grounds to believe that Tas Gas Holdings Pty Ltd will be able to pay its debts as and when they become due and payable".

It is also a requirement of an audit, as set out in auditing standard ASA 570 *Going Concern*, that the auditor considers the appropriateness of the directors' use of the going concern assumption in the preparation of the financial statements. In particular going concern means that an entity is expected to be able to pay its debts as and when they fall due for a relevant period of approximately 12 months from the date of the auditor's report. The Financial Statements of Tas Gas Holdings Pty Ltd contained an unmodified audit opinion. This indicates that we as auditors were satisfied as at the date of signing that opinion that it was appropriate, based on our evaluation of the directors' assessment of the entity's ability to continue as a going concern, for the directors to prepare the financial report on a going concern basis.

We do not have any responsibility to perform procedures or make any enquiry regarding the financial report after the date of the auditor's report. We have performed no further audit work since the date of our audit report and therefore provide no assurance as at the date of this letter as to whether the going concern basis of preparation remains appropriate.

This letter has been prepared solely to assist you in satisfying the requirement by Tas Gas Holdings Pty Ltd to demonstrate its' ability to pay its debts as and when they become due and payable. We disclaim any assumption of responsibility for any reliance on this letter to any person other than the Directors or for any purpose other than that for which it was prepared.

PricewaterhouseCoopers, ABN 52 780 433 757
2 Riverside Quay, SOUTHBANK VIC 3006, GPO Box 1331 MELBOURNE VIC 3001
T: +61 3 8603 1000, F: +61 3 8603 1999, www.pwc.com.au



We do not accept any responsibility for losses occasioned to Tas Gas Holdings Pty Ltd or to any other party as a result of the circulation, reproduction or use of this letter contrary to the provisions of this paragraph.

Yours faithfully,

A handwritten signature in black ink that reads 'Trevor Johnston'.

Trevor Johnston
Partner



I, **JAMES JENKINS** of [REDACTED], being **CHIEF FINANCIAL OFFICER** of **TAS GAS RETAIL PTY LTD**, declare that **TAS GAS RETAIL PTY LTD**'s associates, any other business where **TAS GAS RETAIL**'s officers have held an officer position and any other entity that exerts control over **TAS GAS RETAIL PTY LTD** has not had:

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

Signed: *James Jenkins*

Date: 27 / 01 / 2023



I, **JAMES JENKINS** of [REDACTED] being **CHIEF FINANCIAL OFFICER** of **TAS GAS RETAIL PTY LTD**, declare that **TAS GAS RETAIL PTY LTD**'s current director/s (or shadow / de facto director/s), and any other person that exerts control over **TAS GAS RETAIL PTY LTD**'s business activities, and all persons who are responsible for significant operating decisions for **TAS GAS RETAIL PTY LTD** have not committed or been the subject of any offence or successful prosecution under any territory, state, Commonwealth or foreign legislation (including, but not limited to, the *Australian Securities and Investments Commission Act 2001 (Cth)*, *Competition and Consumer Act 2010 (Cth)* and the *Corporations Act 2001 (Cth)*, relevant to **TAS GAS RETAIL PTY LTD**'s capacity as an energy retailer.

Signed: *James Jenkins*

Date: 27 / 01 / 2023

"03"



I, **JAMES JENKINS** of [REDACTED], being **CHIEF FINANCIAL OFFICER** of **TAS GAS RETAIL PTY LTD**, declare that:

- No member of **TAS GAS RETAIL PTY LTD**'s management team has been disqualified from the management of corporations;
- There is no record of bankruptcy *in Australia* of any member of **TAS GAS RETAIL PTY LTD**'s management team; *and*
- *To the best of my knowledge, no member of TAS GAS RETAIL PTY LTD's management team has a record of bankruptcy in an overseas jurisdiction.*

Signed: *James Jenkins*

Date: 22 / 03 / 2023

Code of Conduct Policy

06 January 2023

Version 15.0

| | |
|---------------------|--------------------------|
| Document Number | BMSDOC-18-378 |
| Document Owner | Head of People & Culture |
| Due Date for Review | 1/02/2024 |

Department Review Required by:

- | | |
|---|--|
| <input type="checkbox"/> CEO | <input type="checkbox"/> Retail |
| <input type="checkbox"/> Finance | <input checked="" type="checkbox"/> People and Culture |
| <input type="checkbox"/> Engineering and Operations | <input type="checkbox"/> Commercial and Business Development |
| <input type="checkbox"/> Health, Safety and Environment | <input type="checkbox"/> General Counsel and Company Secretary |

Applicable to:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Tas Gas Holdings | <input checked="" type="checkbox"/> Gas Network Victoria |
| <input checked="" type="checkbox"/> Tas Gas Networks | <input checked="" type="checkbox"/> Gas Pipeline Victoria |
| <input checked="" type="checkbox"/> Tas Gas Retail | |

Code of Conduct Policy

Document History

| Version No. | Published Date | Description of Change |
|-------------|-------------------|--|
| 1.0 | September 2011 | New document |
| 2.0 | September 2011 | |
| 3.0 | April 2014 | |
| 4.0 | July 2014 | Policy renewed per renewal date |
| 5.0 | December 2014 | Update wording regarding subsidiaries and change review date to 2 years |
| 6.0 | April 2016 | New Brookfield template. |
| 7.0 | August 2016 | Revise gift amount to \$250 in section 4.2.3.2. |
| 8.0 | July 2017 | New Enwave template. |
| 9.0 | October 2019 | Enwave template; Grievance Handling Policy, Ring Fencing Policy and Disciplinary Policy added to additional reading section. |
| 10.0 | 24 January 2020 | Document reviewed by EA (HR) – updated to reflect change of ownership. |
| 11.0 | 29 January 2020 | Updated the conflict procedure statement. |
| 12.0 | 03 September 2020 | Change to Tas Gas formatting. |
| 13.0 | 25 October 2021 | Document ownership, removal of Corporate Services, language reflective of restructure. Reviewed. |
| 14.0 | 03 October 2022 | Updated the document ownership |
| 15.0 | 03 January 2023 | Updated next review date in the system. |

References

Cited in this Document

| Title | Document Number |
|--------------------------------|-----------------|
| Conflict of Interest Procedure | BMSDOC-18-1135 |

Additional Reading

| Title | Document Number |
|---|-----------------|
| Anti-Discrimination legislation (all states) | |
| ASX Continuous Disclosure Policy | |
| Disciplinary Policy | BMSDOC-18-726 |
| Fair Work Act | |
| Grievance Handling Policy | BMSDOC-18-717 |
| Other relevant State and Commonwealth Legislation | |
| Privacy legislation | |
| Ring Fencing Policy | BMSDOC-18-397 |
| Work Health and Safety Act 2012 | |
| Workplace Communication | BMSDOC-18-511 |
| Workplace Gender Equality (WGE) Act 2012 | |



Code of Conduct Policy

Code of Conduct Policy

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Code of Conduct Policy

1. SCOPE

This policy provides guidelines for conduct and behaviour for employees, consultants, external contractors and partners working with or for Tas Gas Holdings Pty Ltd, therefore all such persons should be informed of this policy and of the requirement that they act in accordance with it.

2. APPLICATION

This policy applies to Tas Gas Holdings Pty Ltd and its subsidiaries, hereinafter referred to as 'Tas Gas', and all employees, contractors and sub-contractors as appropriate.

3. DEFINITIONS

| Term | Description |
|---------|--|
| Tas Gas | Tas Gas Holdings Pty Ltd includes, but is not limited to, the following subsidiaries: <ul style="list-style-type: none"> • Tas Gas Holdings Pty Ltd (TGH) • Tas Gas Networks Pty Ltd (TGN) • Tas Gas Retail Pty Ltd (TGR) • Gas Networks Victoria Pty Ltd (GNV) • Gas Pipeline Victoria PTY Ltd (GPV) |

4. POLICY OBJECTIVES AND PRINCIPLES

To define the principles and core values that underpin how Tas Gas and its associated entities do business. The principles of accountability, integrity and transparency reflect the business ethics of Tas Gas. The purpose of this policy is to describe the standards of behaviour and conduct expected from employees and temporary contractors in their dealings with customers, stakeholders, business partners, co-workers, management, and the general public.

4.1 Details

Tas Gas is committed to acting with integrity in the conduct of its operations, in accordance with the key values which underpin this policy:

| Key Values | |
|---------------------------|--|
| Conduct in the workplace | <ul style="list-style-type: none"> • Confidentiality: protecting our sensitive information and knowledge • Safety & Security: ensuring our people and assets are safe and secure • Fairness & Equity: treating people with respect, consideration, and professionalism • Integrity: behaving honestly, complying with the law and Prime Infrastructure's policies • Accountability: being accountable for our decisions and their consequences • Using Assets: using Tas Gas resources in Tas Gas's best interests |
| Conduct with stakeholders | <ul style="list-style-type: none"> • Transparency: operating a robust system of corporate governance • Disclosure: full disclosure of personal investments in Tas Gas or related companies • Communication: keeping stakeholders fully informed of our actions • Compliance: meeting or exceeding all our legal obligations • Responsibility: recognising and discharging our responsibilities to the community |

| Key Values | |
|---------------------------------------|--|
| Conduct with business partners | <ul style="list-style-type: none"> • Conflicts of interest: disclosing conflicts of interest at the earliest possible stage • Gifts and benefits: reporting gifts and refusing improper inducements • Fairness: ensuring a level playing field in our dealings with suppliers and business partners • Tas Gas and related parties: ensuring compliance in both form and substance with the Conflicts Committee Charter |

The specific requirements and standards applying to the areas above are described in the section referred to in this document as Code of Conduct Standards. Compliance with these principles is mandatory.

5. CODE OF CONDUCT STANDARDS

5.1 Conduct in the workplace

5.1.1 Confidentiality

A great deal of information held by Tas Gas is either personal, politically sensitive or has commercial value. All information relating to the business affairs of Tas Gas, its customers and employees should be treated with absolute confidentiality. Confidential information must only be used for the purpose intended and not for personal benefit.

Except in the course of his/her duties as an employee or with the Board's express authority, an employee must not give or disclose, directly or indirectly, any information about Tas Gas's business or anything of which the employee has official knowledge.

Employees must ensure that all records and files in their possession are secured. This includes computer files that should not be accessed by unauthorised people. Employees should always ensure that their password is not used by any other employee and is not recorded in an accessible place.

Files or records in the possession of Tas Gas must not be destroyed without approval of the CEO, or in the case of files or records for which directors and former directors have a right of access, without the approval of the Board.

Appropriate confidentiality provisions should be included in contracts with consultants, contractors, and other parties who provide services to Tas Gas.

Any intellectual property invented or created by an employee in the course of their employment shall remain the property of Tas Gas, unless otherwise agreed in writing between the parties. Tas Gas reserves the right to take legal action against former employees in instances where they disclose confidential information.

5.1.2 Safety and Security

Tas Gas is firmly committed to protecting the health, safety and welfare of employees, customers and others who may be affected by its activities.

Tas Gas has established detailed policies and procedures relating to work health and safety. Compliance with these policies and procedures is mandatory. Any intentional failure to observe safety rules and procedures will be regarded as serious misconduct.

Code of Conduct Policy

5.1.3 Fairness and Equity

Tas Gas is committed to developing a diverse workforce and to providing a work environment in which everyone is treated fairly and with respect. Employees will abide by the principles of Workplace Gender Equality and treat everyone fairly and equitably with respect, courtesy, compassion and sensitivity. Issues that arise will be dealt with consistently, promptly, fairly and in accordance with approved procedures in a non-discriminatory manner and in conformity with natural justice. Harassment in any form is unacceptable. Actions that constitute harassment are regarded as serious misconduct.

5.1.4 Using Assets

Employees will not use Tas Gas funds, property, equipment or other resources for personal benefit. Minor use of Tas Gas property (such as reasonable use of the telephone for private calls) is accepted. Tas Gas resources must not be sold, loaned or donated without management approval. Officers and employees are responsible for safeguarding Tas Gas resources under their control, including information and for maintaining accurate records regarding the use of resources.

5.2 Conduct with Stakeholders

5.2.1 Compliance

Compliance with all laws and regulations in all relevant jurisdictions where Tas Gas operates is the minimum expectation. Some laws affect everyone, such as those concerning workplace gender equality and work health and safety. Other laws primarily affect employees in particular roles, such as those concerning product liability, competition and protection of the environment.

Tas Gas acknowledges its obligations under Commonwealth privacy legislation and will only collect personal information ethically and lawfully. Employees collecting personal information on behalf of Tas Gas will comply with the law and respect the privacy of that information.

5.3 Conduct with Business Partners

5.3.1 Conflicts of Interest

We expect that you will act honestly and ethically and in the best interests of the company by avoiding actual and perceived conflicts of interest in your personal and professional relationships.

To assist your determination of what constitutes a “conflict of interest” it is important to note that the company believes that employees who engage third parties who routinely conduct business with the company for the employee’s personal purposes can create real or, at the very least, apparent conflicts of interest. Employees must not, without prior written consent of the CEO (or, in the case of the CEO, without the prior written consent of the Chair), engage, retain, hire or otherwise solicit, either orally or in writing, any vendor, contractor or other third party whom they know routinely supplies goods to or renders services for the company to supply goods to or render services for the employee’s personal purposes.

Employees have a primary business responsibility to act in the interests of Tas Gas and should avoid any activity that may interfere, or have the appearance of interfering, with this responsibility. Such circumstances could compromise or appear to compromise the Employee’s ability to make impartial business decisions.

If the potential for conflict of interest arises from involvement in a particular activity, employees must act in accordance with the *Conflict of Interest Procedure* (BMSDOC-18-1135) and seek guidance from People & Culture as to whether the specified activity represents a genuine conflict of interest.

Code of Conduct Policy

5.3.2 Gifts and Benefits

Employees will not accept a gift or benefit offered that is intended to, or is likely to, influence the way their duties are carried out. Gifts or benefits with a value more than \$250 must be approved by the CEO. In doing so there is an over-riding requirement that there is no possibility that the recipient might be, or might appear to be, compromised in receiving the gift. Seeking any gifts, favours, or forms of entertainment in return for, or exchange of, business, services or information, is also unacceptable and could damage Tas Gas's integrity and reputation.

5.3.3 Non-compliance

The consequences of not complying with acceptable standards of performance or behaviour will vary with the incident and the circumstances applying at the time but in many cases will be considered as misconduct and subject to disciplinary action. Such discipline will be carried out in accordance with the Company's disciplinary system.

Note: *Counselling, reallocating duties or additional training will be given in cases of substandard work performance or for any minor instance(s) of misconduct before taking formal disciplinary action in order to help the employee find reasonable solutions to the problem. A time frame for improvement will be given and the employee will be told explicitly the result of further performance failure. Notation to this effect must be made by the Supervisor concerned.*

5.3.4 Category 1: serious misconduct - dismissal offences

This covers actions and types of misconduct where no warning can be given. If an employee fails to observe these rules covering serious misconduct, summary dismissal can be expected. The following actions amount to serious misconduct:

- Theft, unauthorised removal of property, being unlawfully in possession of Company property or other forms of dishonesty or wilful damage in connection with Company property, or the property of any other employee (whether such act results in criminal prosecution).
- Fighting or physically assaulting another person on Company premises or during working hours.
- Acts of disobedience, negligence or incompetence, which affects safety, quality, security, Company property or the good conduct of the business (this includes being intoxicated whilst on duty).
- Refusal to perform normal duties or refusal to comply with a lawful and reasonable instruction of a supervisor or manager.
- Using threatening language to, or intimidating behaviour towards, another person on Company premises or during working hours.
- Deliberate avoidance of duties (including sleeping on duty during working hours).
- Behaving in such a manner as to injure or cause extreme risk to other persons on Company premises.
- Operation of machinery or vehicle where alcohol, illegal drugs, prescription or pharmacy medication has been consumed, impairing ability and causing harm and injury to others.
- Where a conviction results in the loss of licence, where the ability to drive is a key element of the position.
- Possession or use of illegal drugs on Company premises, or whilst on duty.
- Smoking in areas designated 'Non-Smoking' for safety reasons.
- Serious instances of unlawful discrimination or sexual harassment.
- Deliberate falsification of Company records or timecards (including Employment Application forms) or making false claims, declarations or reports.

Code of Conduct Policy

- Misrepresenting the Company for personal gain and/or unauthorised disclosure of confidential Company information.
- Unauthorised carrying or possession of firearms on Company premises or during working hours.
- Unauthorised disclosure of confidential Company information.
- Engaging in other business activities that create a conflict of interests.
- Using the internet for illegal or illicit purposes.
- Repeated disregard for Company policies and procedure particularly in the case of safety.

Note: *The above is not a complete list of all acts of serious misconduct. It is an indication only and there may be other acts of misconduct, which are so serious as to warrant summary dismissal.*

5.3.5 Category 2: misconduct - warning offences

Misconduct is action which breaches the rules on less serious types of misbehaviour. A breach of the rules covering this type of action is likely to result in a warning being issued to the employee concerned. Repeated breaches of the rules on misconduct (or persistent poor performance) will constitute grounds for dismissal. The following actions are misconduct for which warnings will be issued:

- Persistent absenteeism, lateness or poor timekeeping.
- Non-compliance of Company policies.
- Repeated failure to achieve acceptable standards of work performance in respect of quality, quantity or timeliness.
- Reporting to work unfit for duty by reason of intoxication or bringing intoxicating liquor onto Company premises without authorisation from a supervisor or manager.
- Using abusive language to another person on Company premises or during working hours.
- Failure to complete stipulated hours of work or leaving assigned place of work without permission or valid reason (apart from a lunch-time for day workers).
- Failure to observe safety rules/procedures or working or acting in an unsafe manner; failure to report an accident.
- Failure to complete an assigned task, interfering with or preventing another employee from carrying out his/her work functions.
- Minor instances of unlawful discrimination/sexual harassment or offensive behaviour.
- Disorderly conduct, boisterous behaviour or practical joke posing a danger to personnel or Company property or product.
- Misuse, abuse or unauthorised use of tools, vehicles and equipment (includes computers and communications equipment), company property or systems.
- Posting of offensive notices, posters or graffiti on Company premises or property.

Note: *The above is not a complete list of all acts of misconduct. It is an indication only and there may be other acts of misconduct, which warrant disciplinary action being taken.*

6. RISKS CONTROLLED UNDER THIS POLICY

The following risks are controlled under this policy:

- Addresses conduct regarding employees and members of the community.
- Provides guidelines for managers, supervisors, team leaders and employees to ensure compliance and adhere to government legislation.

Code of Conduct Policy

7. RESPONSIBILITIES UNDER THIS POLICY

| Role | Responsibility | Frequency |
|-------------------|---|------------------------------|
| All employees | Promote the highest standards of ethical business conduct and obey all laws and regulations as well as other company policies and procedures. | Ongoing |
| All employees | Report immediately any violation or suspected violation of this policy on ethical business conduct to the CEO or board. | When the circumstance arises |
| Senior Management | Promote the highest standards of ethical conduct. | Ongoing |

Anti-bribery and Anti-corruption Policy

06 January 2023

Version 4.0

| | |
|---------------------|---------------------------------------|
| Document Number | BMSDOC-18-1685 |
| Document Owner | General Counsel and Company Secretary |
| Due Date for Review | 6/01/2025 |

Review Required by:

- | | |
|---|---|
| <input type="checkbox"/> CEO | <input type="checkbox"/> Retail |
| <input type="checkbox"/> Finance | <input type="checkbox"/> People and Culture |
| <input type="checkbox"/> Engineering and Operations | <input type="checkbox"/> Commercial & Business Development |
| <input type="checkbox"/> Health, Safety and Environment | <input checked="" type="checkbox"/> General Counsel & Company Secretary |

Applicable to:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Tas Gas Holdings | <input checked="" type="checkbox"/> Tas Gas Retail |
| <input checked="" type="checkbox"/> Tas Gas Networks | <input checked="" type="checkbox"/> Gas Pipeline Victoria |
-

Document History

| Version No. | Published Date | Description of Change |
|-------------|-----------------|---|
| 1.0 | Dec 2017 | New document. |
| 2.0 | January 2021 | Removed Enwave references and updated contacts. |
| 3.0 | September 2022 | Edited Department name and Applicable companies |
| 4.0 | 06 January 2023 | Updated next review date in the system. |

References

Cited in this Document

| Title | Document Number |
|-------|-----------------|
| N/A | |

Additional Reading

| Title | Document Number |
|-------|-----------------|
| N/A | |

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Anti-bribery and Anti-corruption Policy

1. SCOPE

This policy applies to Tas Gas Holdings Pty Ltd and its subsidiaries, hereinafter referred to as ‘Tas Gas’, and all employees, contractors and sub-contractors as appropriate.

2. APPLICATION

This policy reflects the standards to which Tas Gas expects any person or entity that performs services on behalf of Tas Gas to adhere to when acting on Tas Gas’ behalf. Such persons or entities acting on Tas Gas’ behalf could include business associates, partners, agents, intermediaries, representatives, suppliers, contractors, third party service providers and, consultants (collectively “Third Parties”).

Please direct any questions and requests for authorisation relating to this policy to the GM Safety & Compliance or any Vice President or more senior individual within Tas Gas (“Senior Executive”). Please see Appendix A hereto for contact information with respect to this policy.

3. DEFINITIONS

| Term | Description |
|-----------------|---|
| Tas Gas | Tas Gas Holdings Pty Ltd includes, but is not limited to, the following subsidiaries: <ul style="list-style-type: none"> • Tas Gas Holdings Pty Ltd (TGH) • Gas Holdings Tasmania (GHT) • Tas Gas Networks Pty Ltd (TGN) • Tas Gas Retail Pty Ltd (TGR) • Regional Energy Victoria Pty Ltd (REV) • Peel Renewable Energy Pty Ltd (PRE) • Peel Renewable Energy Genco Pty Ltd (PRE) • Gas Networks Victoria Pty Ltd (GNV) • Gas Pipeline Victoria PTY Ltd (GPV) |
| Bribe | Anything of value that is offered, promised, given or received by any party to influence a decision or to gain or reward an improper unfair advantage. |
| Corruption | The abuse of power or position for private gain. |
| Public Official | is any person who is employed by or is acting in an official capacity for a government, a department, agency or instrumentality of a government, regulator, or a public international organization. |
| Third Party | Persons or entities acting on Tas Gas’ behalf could include business associates, partners, agents, intermediaries, representatives, suppliers, contractors, third party service providers and, consultants. |

4. POLICY OBJECTIVES AND PRINCIPLES

The purpose of this policy is to reiterate Tas Gas’ commitment to conducting its business with honesty and integrity and in full compliance with applicable anti-bribery or anti-corruption laws in the jurisdictions in which Tas Gas operates.

4.1 Prohibition

4.1.1 *Bribery and corruption are strictly prohibited.*

A “bribe” is anything of value that is offered, promised, given or received by any party to influence a decision or to gain or reward an improper unfair advantage for the benefit of Tas Gas or any other party. “Corruption” is the abuse of power or position for private gain. Bribery and corruption can take many forms, including the offering, provision or acceptance of:

- Cash payments
- Loans or non-arm’s length transactions
- Phony jobs or “consulting” relationships
- Kick-backs
- Political contributions

Anti-bribery and Anti-corruption Policy

- Charitable contributions
- Employment
- Social benefits
- Gifts, travel, hospitality and the reimbursement of expenses.

Tas Gas strictly prohibits all bribery or corruption, in any form whatsoever.

4.1.2 Do not make “facilitation payments”

Facilitation payments are also a form of bribe and are, therefore, not permitted. Facilitation payments are small payments made to secure or speed up routine actions or otherwise induce public officials or other Third Parties to perform routine functions they are otherwise obligated to perform, such as issuing permits, approving immigration documents or releasing goods held in customs. This does not include legally required administrative fees or legally required fees to fast-track services.

If you have a question about whether a particular payment is permitted under this policy, please contact the GM Safety & Compliance or a Senior Executive prior to making such payment.

4.2 Dealing with Public Officials

4.2.1 Interactions with public officials require enhanced scrutiny and sensitivity.

A “public official” is any person who is employed by or is acting in an official capacity for a government, a department, agency or instrumentality of a government, regulator, or a public international organization. This includes elected or appointed persons who hold legislative, administrative or judicial positions such as politicians, bureaucrats and judges. It also includes persons who perform public functions such as professionals working for public health agencies, water authorities, planning officials etc. A “public official” also includes employees of government-owned or controlled businesses such as the manager of a state-owned public utility.

There is increased sensitivity and scrutiny of dealings with public officials because this has traditionally been an area where bribery activity and corruption are more likely to occur. Be cognizant of these risks in your dealings and interactions with public officials and consider how your actions may be viewed. For example, payments to close relatives of public officials may be treated by enforcement authorities as direct payments to the public officials and therefore may constitute violations of law.

As a result, gifts to public officials are strictly prohibited and entertainment for public officials should be modest and reasonable. In addition, because interactions with public officials carry special risks under applicable anti-bribery and anti-corruption laws, contracts and payments to public officials should be reviewed carefully to determine what additional safeguards, if any, may be necessary to protect Tas Gas. Please seek authorization from the GM Safety & Compliance or contact listed in Appendix A prior to entertaining, contracting with, or offering or making payments to public officials.

4.3 Gifts and Entertainment

4.3.1 Any gifts given or received shall be modest and any entertainment given or received shall be proportionate and reasonable for the circumstances.

Subject to the restrictions set out in the prior section relating to public officials, gifts given to or received from persons who have a business relationship with Tas Gas are generally acceptable, if the gift is modest in value, is appropriate to the business relationship, is not given or received to gain an improper advantage and does not create an appearance of impropriety. No cash payment or cash equivalents should be given or received.

Entertainment (e.g. meals, tickets to sporting events or theatre, rounds of golf) given to or received from persons who have a business relationship with Tas Gas are generally acceptable, if the entertainment is reasonable in value, appropriate to the business relationship, is not given or received to gain an improper advantage, does not create an appearance of impropriety and if a representative from the sponsoring organization (the party paying for the entertainment) is present at the event.

Anti-bribery and Anti-corruption Policy

Gifts and entertainment (including meals) that are repetitive, no matter how small, may be perceived to be an attempt to create an obligation to the giver and should be avoided.

Employees should not give or receive “big-ticket” items, such as travel accommodations, conference fees, costs for road shows, or event sponsorships, without prior authorization from the GM Safety & Compliance or a Senior Executive.

4.4 Political Donations and Lobbying

4.4.1 Do not offer contributions to political parties or candidates that might influence, or be perceived as influencing, a business decision.

As a rule Tas Gas does not make any political donations.

To ensure that we do not breach the law regarding political donations in any country; all political donations no matter how small or insignificant, made on behalf of Tas Gas (directly or indirectly) must be authorized in advance by the CEO.

Political donations made by individuals on their own behalf should comply with any applicable local laws and regulations.

Various federal, state and municipal laws and regulations impose specific restrictions and rules with respect to political contributions, both those made on behalf of Tas Gas or made by individuals on their own behalf, which can carry significant penalties for Tas Gas for violations.

4.4.2 Do not engage in any lobbying activities on behalf of Tas Gas without specific authorization.

Tas Gas encourages its employees, officers to take an active role in public service. However, any participation in this regard is to be undertaken as an individual and not as a representative of Tas Gas.

Lobbying activities generally include attempts to influence the passage or defeat of legislation and it may trigger registration and reporting requirements. In many jurisdictions, the definition of lobbying activity is extended to cover efforts to induce rule-making by executive branch agencies or other official actions of agencies, including the decision to enter into a contract or other arrangement.

You may not engage in lobbying activities on behalf of Tas Gas without prior authorization from the GM Safety & Compliance or a Senior Executive.

4.5 Charitable Donations

4.5.1 Do not solicit or offer donations to suppliers, vendors or public officials in a manner which communicates that compliance is a pre-requisite for future business.

We encourage our officers and employees to contribute personal time and resources to charities and non-profit organizations. However, unless the solicitation is supported by Tas Gas, you are prohibited from using Tas Gas’ resources to solicit donations.

All requests on behalf of Tas Gas for corporate gifts to charities and other not-for-profit organizations shall be authorized in advance by the GM Safety & Compliance or a Senior Executive. Charitable donations or requests for charitable donations made by individuals on their own behalf should comply with any applicable local laws and regulations.

If you are requested by a public official to make a personal donation to a particular charity, please seek authorization from the GM Safety & Compliance or a Senior Executive before agreeing to, or making, the donation.

4.6 Record Keeping

4.6.1 Record all our transactions in a complete, accurate and detailed manner so that the purpose and amount of the transaction is clear.

In addition to prohibiting bribery and corruption, some anti-bribery and anti-corruption legislation requires proper record keeping and the establishment and maintenance of internal controls. The purpose of these provisions is to prevent companies from concealing bribes and to discourage fraudulent accounting practices.

All of Tas Gas' transactions must be recorded completely, accurately and with sufficient detail so that the purpose and amount of any payment is clear. No accounts or payments may be kept "off-book". False, misleading, or artificial entries must never be made in the books and records of Tas Gas for any reason.

4.7 Third Parties

4.7.1 Third Parties are not permitted to pay, offer, accept or request bribes on our behalf.

Tas Gas may be prosecuted for failing to prevent bribery by a person associated with it. This includes any Third Party (as defined above).

This means due diligence shall be undertaken on Third Parties to establish their anti-bribery credentials, where warranted by the assessed level of risk. This could include informing these persons (and associated companies) of this policy, meeting with them to better assess their character, and making commercially reasonable inquiries into their reputation and past conduct. Anti-bribery language should be included in Third Party agreements, where appropriate, in consultation with the GM Safety & Compliance or a Senior Executive.

4.8 Reporting

Tas Gas' personnel have an obligation to adhere to this policy. If you witness behaviour on the part of Tas Gas' personnel or any Third Party that you believe may represent a violation of this Policy you must promptly report it. Internal reporting is important to Tas Gas and it is both expected and valued.

Tas Gas takes all reports seriously, and every report received will be assessed and, where necessary, appropriate investigation will be undertaken. The confidentiality of reported violations will be maintained where possible, consistent with the need to conduct an adequate review and subject to applicable law.

Reports should in the first instance be made to the GM Safety & Compliance or a Senior Executive who will ensure that the information is properly handled and escalated as necessary. In the event that this does not appear to be an appropriate avenue because of the nature or the content of the report, it should be made to the Ethics Hotline or the Ethics Reporting website. See Appendix A for the contact details of the Ethics Reporting channels.

No retribution or retaliation will be taken against any person who has made a report based on the reasonable good faith belief that a violation of this policy has occurred.

4.9 Enforcement and Disciplinary Action

Tas Gas will impose discipline on individuals found to have breached this policy, in a manner that is fair, consistent and that reflects the nature and facts of the violation. **Anyone subject to this policy who violates it may face disciplinary actions up to and including termination of their employment for cause and without notice.** The violation of this policy may also violate certain anti-bribery and anti-corruption laws. If Tas Gas discovers a violation of any anti-bribery laws, it may refer the matter to the appropriate authorities, which could lead to penalties, fines or imprisonment or other liability.

5. RISKS CONTROLLED UNDER THIS POLICY

The following risks are controlled under this policy:

- Addresses conduct regarding employees and members of the community.
- Provides guidelines for managers, supervisors, team leaders and employees to ensure compliance and adhere to government legislation.

6. RESPONSIBILITIES UNDER THIS POLICY

| Role | Responsibility | Frequency |
|-------------------|--|-------------------------------|
| All employees | Promote the highest standards of ethical business conduct and obey all laws and regulations as well as other company policies and procedures. | Ongoing |
| All employees | Report immediately any violation or suspected violation of this policy on ethical business conduct to the CEO, Senior Legal Counsel or GM Safety & Compliance as per Appendix A. | When the circumstances arises |
| Senior Management | Promote the highest standards of ethical conduct. | Ongoing |

APPENDIX A - CONTACT INFORMATION

Tas Gas Australia Contacts:

CEO

Phaedra Deckart

Email [REDACTED]
Phone [REDACTED]
Mobile [REDACTED]

GM Safety & Compliance

Craig Large

Email [REDACTED]
Phone [REDACTED]
Mobile [REDACTED]



HEALTH AND SAFETY POLICY

Tas Gas Holdings Pty Ltd is committed to the principle that all occupational injury and illness can be prevented and that the management of health and safety is an integral part of all our responsibilities.

This will be achieved by:

- complying with all relevant legislation. To do this we will ensure that everyone is responsible for working in a safe manner, following all safety rules, participating in safety training and communication meetings, and identifying and reporting all health and safety hazards and associated risks
- establishing health and safety as an essential part of our culture and as a way of life, including mental health awareness and engagement in health and well-being programs, and encouraging participation and consultation with all
- recognising the impact that external drivers such as pandemic, natural disasters and social or political unrest can have on our people and operations and ensuring that we have measures in place to manage that impact
- ensuring our systems and processes continue to deliver improvements in our health and safety performance
- integrating the management of all health and safety risks, including mental health, into all business processes by using standard risk management techniques
- managers and team members identifying and resolving together all health and safety issues as they arise
- training all team members to perform their work safely and supervising them appropriately to ensure compliance with all relevant health and safety standards
- requiring that everyone will attempt or undertake work only when it is safe to do so. Anyone observing substandard, dangerous, unhealthy acts or conditions will take immediate action to implement temporary controls, within their scope of authority, and to address the situation without delay
- maintaining an effective and positive injury management and Return to Work program, under which the business will provide support and advice to all affected parties to ensure each is aware, respectful and where practicable accommodating of the other's needs and limitations in returning to work after a workplace injury. In addition to this, we will provide counselling and support to employees via an independent workplace counselling provider.

We will measure our success by achieving our goal of zero injuries. We will also seek to achieve compliance with our Occupational Health and Safety Management System certification to the Standard AS/NZS ISO 45001:2018.

Phaedra Deckart
Chief Executive Officer

"AB"

| | January | February | March | April | May | June | July | August | September | October | November | December |
|----|---------|---|---|--------------------|-----|--------------------------------------|------|--------|--|---------|-----------------------------|----------|
| 1 | | | | | | Financial Hardship | | | Mental Health First Aid Course for all new employees | | Tas Gas Refresher Induction | |
| 2 | | | | | | Domestic & Family Violence Awareness | | | Mental Health First Aid Refresher | | | |
| 3 | | | | | | Customer Life Protection | | | | | | |
| 4 | | | | | | | | | | | | |
| 5 | | | | Emergency Exercise | | | | | | | | |
| 6 | | | | | | | | | | | | |
| 7 | | | | | | | | | | | | |
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| 9 | | | | | | | | | | | | |
| 10 | | | | | | | | | | | | |
| 11 | | | | | | | | | | | | |
| 12 | | | | | | | | | | | | |
| 13 | | Managing Difficult Customers/Complaints Resolution Training | | | | | | | | | | |
| 14 | | | | | | | | | | | | |
| 15 | | | | | | | | | | | | |
| 16 | | | | | | | | | | | | |
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| 25 | | | | | | | | | | | | |
| 26 | | | | | | | | | | | | |
| 27 | | | Type 1 Compliance Breach/Marketing Training | | | | | | Type 1 Compliance Breach/Marketing Training | | | |
| 28 | | | | | | | | | | | | |
| 29 | | | | | | | | | | | | |
| 30 | | | | | | | | | | | | |
| 31 | | | | | | | | | | | | |

To complete annually

To be completed every 3 years

To be completed annually as each employee requires

To be completed every 6 months

Customer Service Employee Compliance Training Checklist

Staff Member Name: _____
 Date: _____
 Signature: _____
 Manager Signature: _____

Compliance with our natural gas retail regulatory obligations in Victoria will ensure that TGR: maintains its retail license; provides services to a standard that meets or exceeds customer expectations; and that those services are provided in a safe and responsible manner. It is very important that the Customer Service Representatives understand TGR's compliance obligations as many of the policies, processes and work instructions that they follow are key to meeting our compliance obligations.

To assist Customer Service Representatives in understanding TGR's Victorian regulatory obligations and the role they play in maintaining compliance, this checklist is to be completed as part of the induction program for new staff and thereafter, annually by all customer service staff (including the Team Leader). The checklist serves to reinforce the key elements of compliance, identify knowledge gaps and identify additional training required.

Once completed, this checklist will be sent to HR to be attached to the employee file. If additional training and support is required, notes of these will also be attached to the employee profile. By keeping records of your engagement in compliance, it helps TGR to demonstrate that its staff understand the key compliance obligations aspects of their roles.

| Key Documents | Reference | Competent? Y or N | Needs Training? Y or N | Notes |
|--|----------------|----------------------|---------------------------|-------|
| I have read and know where to locate TGR's Compliance Management System for Victoria. | BMSDOC-18-1447 | | | |
| I have read and know where to locate TGR's Victorian Safety Case. | BMSDOC-18-1374 | | | |
| I have read and know where to locate TGR's Customer payment support policy. | BMSDOC-18-1550 | | | |
| I know that TGR has reporting obligations which include a report every 6 months to ESC and every quarter to ESV and the responsibility for compiling interim data on a monthly basis will fall to the CSR responsible for preparing the end of month report. | | | | |
| I understand that if a customer reports one of the following events, I am to immediately notify (in no particular order) the TGR Manager, CEO, TGN/EVN Asset Manager and Safety and Compliance Manager: <ul style="list-style-type: none"> the death or injury to a person; a gas event that causes significant disruption to a community; significant damage to property; or an explosion. I understand that if I become aware of gas being supplied to an unsafe installation or any other breach of our gas safety and retail obligations to customers, that this should be reported to your manager and details recorded to be reported to either ESC or ESV returns depending on the issue. | | | | |
| I understand that it is important to be proactive in regularly reviewing and updating procedures and work instructions that contribute to compliance activities so that they are accurate and useful. | | | | |
| In accordance with our values, I understand that it is important to speak up if I notice non-compliant activities. | | | | |

Customer Service Employee Compliance Training Checklist

| Key Documents | Reference | Competent? Y or N | Needs Training? Y or N | Notes |
|---|-------------------|----------------------|---------------------------|-------|
| Key Policies and Procedures to be aware of (organisational level policies such as Code of Conduct and Bullying and Harassment are not included as training and awareness programs are delivered by HR) | | | | |
| Complaints Policy | BMSDOC-18-1349 | | | |
| Complaints Procedure (TGR) | BMSDOC-18-1350 | | | |
| Work Instructions – The following Work Instructions have been identified in the Compliance Management System as important to follow to ensure that the way we undertake that task is compliant. Indicate the tasks you are competent in and which ones you need support and training in. | | | | |
| Account Set Up | BMSDOC-18-1069 | | | |
| Adding a Pricing Plan to a Customer | BMSDOC-18-1247 | | | |
| Altering Standard Invoice Trading Terms | BMSDOC-18-1212 | | | |
| Broken Payment Arrangement Report | BMSDOC-18-1147 | | | |
| Close Service Order | BMSDOC-18-1107 | | | |
| Create and Install a Meter and Register (excluding Time of Use) | BMSDOC-18-1126 | | | |
| Create Prospect - Installation Already Exists | BMSDOC-18-1218 | | | |
| Create Prospect - Installation Does Not Exist | BMSDOC-18-1219 | | | |
| Customer satisfaction - guidelines for complaints handling | AS ISO 10002-2006 | | | |
| Customer Transfer Notice - No Special Meter Read Required | BMSDOC-18-1237 | | | |
| Customer Transfer Notice - Special Meter Read Required | BMSDOC-18-1238 | | | |
| Customer Transfer Objection Notice | BMSDOC-18-1240 | | | |
| Customer Transfer Request (CHURN) Flow Chart | BMSDOC-18-1195 | | | |
| Daily Receipting | BMSDOC-18-1127 | | | |
| Direct Debit Processing | BMSDOC-18-1122 | | | |
| Direct Debit Returned - Fixed Payments | BMSDOC-18-1188 | | | |
| Direct Debit Returned - Variable Payments | BMSDOC-18-1189 | | | |
| Direct Debit Set Up - Fixed Payments | BMSDOC-18-1232 | | | |
| Direct Debit Set Up - Variable Payments | BMSDOC-18-1231 | | | |
| Disconnection for Non-Payment - Invoicing | BMSDOC-18-1226 | | | |
| Disconnection Read - Invoicing | BMSDOC-18-1225 | | | |
| Emergency Exercise and Simulation Record | BMSDOC-18-998 | | | |
| Emergency Management Checklist (TGR) | BMSDOC-18-1448 | | | |
| Emergency Management Plan (VRE) | BMSDOC-18-1453 | | | |
| Final Read - Invoicing | BMSDOC-18-1125 | | | |
| Installing a Register on a Meter | BMSDOC-18-1216 | | | |
| Mass Market Billing | BMSDOC-18-1100 | | | |
| MIRN Discovery - Installation Does Not Exist - Flow Chart | BMSDOC-18-1254 | | | |
| MIRN Discovery - Installation Exists - Flow Chart | BMSDOC-18-1253 | | | |
| MIRN Discovery - Work Order Request | BMSDOC-18-1071 | | | |
| New Residential Connection | BMSDOC-18-1400 | | | |
| Payment Arrangement Equalisation | BMSDOC-18-1211 | | | |
| Payment Arrangements | BMSDOC-18-1111 | | | |

Customer Service Employee Compliance Training Checklist

| Key Documents | Reference | Competent? Y or N | Needs Training? Y or N | Notes |
|--|----------------|----------------------|---------------------------|-------|
| Payment Arrangements Flow Chart | BMSDOC-18-1097 | | | |
| Refund Requests | BMSDOC-18-1112 | | | |
| Remove Meter and Register (excluding Time of Use) | BMSDOC-18-1235 | | | |
| Remove Register - Customer Transfer (excluding Time of Use) | BMSDOC-18-1236 | | | |
| Reprinting Individual Invoices or Statements | BMSDOC-18-1241 | | | |
| Security Deposit Procedure (Victoria) | BMSDOC-18-1503 | | | |
| Update Installation Status | BMSDOC-18-1227 | | | |
| Updating a Customer to Final - No Billing | BMSDOC-18-1124 | | | |
| Updating Charge Rates on a Pricing Plan | BMSDOC-18-1250 | | | |
| Victoria Connection Process | BMSDOC-18-1668 | | | |
| Work Order Request - Emergency Plumbing Order and Illegal Use of Gas | BMSDOC-18-1667 | | | |

Comments on compliance:

Contributions to compliance activities:



Position Description

Last Updated: 3/05/2021

Version No.: 2

Tasmania Tas Gas Retail Victoria Other:

Position Title: Compliance Manager

Company: Tas Gas Networks Pty Ltd

Region: Tasmania and Regional Victoria

Department: Corporate (General Counsel & Co Sec)

Position Reports to: General Counsel & Company Secretary

Employee Category: This person is classified as a “worker” under the Work Health and Safety Act 2011 and the Work Health and Safety Regulation 2011 (WHS Regulation)

Direct Reports: Nil

Succession Role(s): General Counsel & Company Secretary

Company Overview

Our Origins

Owned by Infrastructure Capital Group (ICG), Tas Gas operates a natural gas distribution network (Tas Gas Networks) and associated retail business (Tas Gas Retail) in Tasmania and Victoria. TGN owns and operates over 839km of gas pipeline around Tasmania fronting over 58,000 properties as well as 211km of gas pipeline in Regional Victoria. In 2020 Tas Gas also took over the responsibility for the operations, maintenance and compliance of the Gas Pipeline Victoria (GPV), an 180Km high pressure gas transmission pipeline in western Victoria.

Tas Gas Retail is the second largest retailer in Tasmania, supplying gas to more than 14,000 industrial, commercial and residential customers.

Purpose of Role

This role provides direct assistance to the General Counsel & Company Secretary. The role assists the business to carry out its legal and compliance obligations. Duties include:

- Legal and compliance research
- Identification of compliance obligations
- Assistance with reporting and monitoring of compliance requirements
- Ensuring compliance and legal obligations are met
- Maintaining currency of tier 1 documents (including Safety Cases and Compliance Plans)

Requirement to travel intra/interstate?

Yes

No

Leadership

- Plan, monitor and coordinate the workflow with the Safety and Compliance Coordinator, ensuring team service delivery meets customer and stakeholder expectations
- Provide an external interface for the team where an overall approach is required
- Proactively assist in the development of quality improvements to regulatory compliance processes
- Proactively initiate and develop quality improvements to team practices and processes
- Provide effective support and encouragement to team members

Operational

- Facilitate scheduling and preparation for regulatory audits;
- Attend and assist with regulatory audits and ensure timely close out of any actions arising;
- Assist Business with the preparation and submission of regulatory reports;
- Assist Business in the notification of serious compliance breaches to Regulators;
- Ensure currency of Safety Cases and Compliance Plans and timely submission to Regulators;
- Carry out legal and compliance research;
- Monitor and report on changes and developments in relevant legislation, regulations and codes;
- Build and maintain on-going relationships with relevant government departments and regulatory bodies;
- Maintain a compliance register for internal stakeholders and liaise with them in relation to critical review and reporting deadlines;
- Facilitate the establishment of regulatory and risk frameworks, policies and procedures required for new and expanding business;
- Assist Business to submit applications for licences, authorisations, variations and exemptions;
- Assist Business to negotiate requests for amendments to contract terms;
- Assist Business to obtain external legal and regulatory advice; and
- Collate executed contracts in a central repository.

Compliance

- Comply with the requirements of all relevant legislation, standards and codes pertaining to your role and business area
- Comply with all licence requirements impacting the business and your role
- Adhere to the compliance obligations expected of you within the employer's policies and procedures as they relate to your employment
- Comply with all internal and external audit requirements
- Reporting compliance non-conformances in accordance with company reporting protocols

Risk

- Manage risks in your area of responsibility, as outlined in the Risk Management Policy
- Manage risks in undertaking your work
- Comply with risk management policies and procedures

Safety

- Comply with all relevant legislation, laws, regulations, standards and codes as required by the company
- Comply with company Work, Health, Safety and Environmental (WHS&E) policies and procedures
- Take reasonable care of your own health and safety and the health and safety of other people including people working under your supervision or direction who may be affected by your acts or omission at the workplace, in accordance with current workplace health and safety legislation in the state and or territory of your employment
- Report all incidents in accordance with company reporting protocols
- Comply with company and legislative requirements in respect to workers compensation pertaining to Return to Work (RTW)
- Attend training associated with WHS&E when required

Key Relationships

Internal:

- Executive Managers

External:

- Regulatory Authority Representatives
- Legal advisors / Consultants
- Government Departments

Qualifications

- A Degree, Diploma or Associate Diploma in Business Administration, Law, Compliance or related field or equivalent experience

Skills

- A minimum of five years' experience in a legal or compliance role
- Ability to work effectively and efficiently in varying environments
- Well-developed interpersonal, negotiation, communication and problem-solving skills
- Well-developed planning and organising skills
- The ability to set and work within agreed priorities and delegate appropriately to achieve outcomes within timeframes
- Well-developed communication skills (written and oral)
- High level of professionalism and confidentiality
- Demonstrated ability in a customer service-oriented environment
- Attention to detail
- Ability to work well under pressure, both individually and in a team environment
- Willingness to travel to other TGN sites when required
- Current unrestricted Driver Licence

Tools and Programs

Tools:

- Laptop

Programs:

- Controlled Document Store
- HRMS
- Microsoft Office Suite
- SharePoint
- Contract Insight

Breakdown of weekly hours spent on each function

| Function | Weekly Hours |
|-------------|--------------|
| Leadership | 4 |
| Operational | 16 |
| Compliance | 16 |
| Risk | 1 |
| Safety | 1 |

Competencies

What are the company's key competencies for success?



Work together

- Have the conversation
- Share the load
- Show respect
- Listen and share ideas

Do what's right

- Act with integrity
- Take ownership
- Be transparent
- Work to a professional standard

Give it a go

- Challenge ourselves
- Support each other
- Learn from failure
- Own our decisions

Stay safe

- "Safety by choice not by chance"
- Be alert
- Take the initiative
- Look after each other

Sign Off

| | | | |
|----------------|--|-------|--|
| Manager Name: | | | |
| Signature: | | Date: | |
| Employee Name: | | | |
| Signature: | | Date: | |
| Review Date: | | | |

"Safety by choice - not by chance"

"AF"



| | |
|--------------------------------|---------------------------------------|
| Position Title: | Compliance Manager/ Officer |
| Location: | Launceston or Hobart, Tasmania |
| Department: | Tas Gas Retail (TGR) |
| Position reports to: | Customer Service & Operations Manager |
| Direct Reports (If applicable) | NA |
| Last Updated | 26 May 2023 |

About Us

Owned by Foresight Group, Tas Gas is a leading Tasmanian energy company. Tas Gas operates natural gas pipelines in both Tasmania and Victoria and is the second largest energy retailer in Tasmania.

Tas Gas Retail (TGR) serves over 10k gas customers in Tasmania & Regional Victoria and is exploring entry into new markets. The Compliance Manager will play a crucial role in ensuring that Tas Gas Retail continues to meet their regulatory obligations and provide compliant products and services to our customers.

Purpose of the Role:

Reporting to Customer Service & Operations Manager, the TGR Compliance Manager/Officer provides direct assistance to the GM Retail and the Customer Service & Operations Manager, Tas Gas Retail. The role is accountable for providing operational support to Tas Gas Retail in carrying out its compliance obligations in relation to its retail licenses.

The role will include:

- Management of TGRs regulatory & compliance framework, including meeting reporting requirements and stakeholder engagement.
- Supporting the TGR team to ensure compliance with TGR license requirements as well as other applicable laws and regulations.

The role will be Tas Gas Retail's trusted compliance advisor when it comes to energy retailing, including marketing & sales.

Key Accountabilities:

- Being the subject matter expert on regulatory requirements relating to the energy retail market in Tasmania and regional Victoria
- Research, including Sales, Marketing and Service requirements, to cover:
 - Developing, reviewing and administering sales compliance regime with third party sales channels.
 - Maintaining sales compliance in the contact centre and ensuring appropriate regime is maintained

- Proactively identify and manage TGRs compliance obligations, including auditing and training
- Assistance with reporting and monitoring of compliance requirements
- Maintaining currency of tier 1 documents (including Safety Cases and Compliance Plans)

Key to success in this role will be your ability to:

Operational

- Assist with preparation for regulatory audits;
- Facilitate internal audits of systems and processes;
- Prepare and submit regulatory reports;
- Ensure currency of Safety Cases and Compliance Plans;
- Carry out research as required;
- Provide guidance on operational impact of new regulatory requirements to the GM Retail and the Customer Service & Operations Manager.
- Assist with the creation, review and implementation of regulatory compliance documentation;
- Assist with training of staff on regulatory obligations and requirements;
- Maintain a compliance register for internal stakeholders and liaise with them in relation to critical review and reporting deadlines;
- Facilitate the establishment of regulatory and risk frameworks, policies and procedures required for new and expanding business;
- Support Tas Gas Sales & Marketing to deliver compliant materials and adhere to sales compliance.

Compliance

- Assist with ensuring TGR compliance with the requirements of all relevant legislation, standards and codes pertaining to the TGR Retailing requirements including Sales, Service and Operations;
- Comply with all license requirements affecting your role;
- Adhere to compliance obligations expected of you within the employer's policies and procedures as they relate to your employment;
- Comply with all internal and external audit requirements;
- Report compliance non-conformances in accordance with company reporting protocols.

Risk Management

- Proactively manage TGR risks;
- Manage risks in undertaking your work, as outlined in the Risk Management Policy;
- Comply with risk management policies and procedures;
- Seek to reduce the risk profiles of the company through implementation of best practice from an enterprise perspective and in compliance with the company's Enterprise Risk Management Framework (ERMF).

Leadership

- Plan, monitor and coordinate the workflow with the Customer Service & Operations Manager, ensuring team service delivery meets customer and stakeholder expectations;
- Provide an external interface for the team where an overall approach is required;
- Proactively assist in the development of quality improvements to regulatory compliance processes;
- Proactively initiate and develop quality improvements to team practices and processes;
- Provide effective support and encouragement to team members

Safety

- Comply with all relevant legislation, laws, regulations, standards and codes as required by the company;
- Comply with company Work Health Safety and Environmental (WHS&E) policies and procedures;
- Take reasonable care of your own health and safety and the health and safety of other people including people working under your supervision or direction who may be affected by your acts or omission at the workplace, in accordance with current workplace health and safety legislation in the state and or territory of your employment;
- Report all incidents in accordance with company reporting protocols;
- Comply with company and legislative requirements in respect to Workers Compensation pertaining to Return to Work (RTW);
- Attend training associated with WHS&E when required.

Key Relationships:

- Internally – GM Retail, Customer Service & Operation Manager, Executive Managers, Legal and Regulatory Team.
- Externally – Regulatory Authority Representative, Legal Advisors, Consultants, Government Departments

Skills Required:

- A minimum of five years’ experience in a business administration, compliance or legal role;
- Ability to work effectively and efficiently in varying environments;
- Well-developed interpersonal, negotiation, communication and problem-solving skills;
- Well-developed planning and organising skills;
- The ability to set and work within agreed priorities and delegate appropriately to achieve outcomes within timeframes;
- Well-developed communication skills (written and oral);
- High level of professionalism and confidentiality;
- Demonstrated ability in a customer service-oriented environment;
- Attention to detail;
- Ability to work well under pressure, both individually and in a team environment;
- Willingness to travel to other TGN sites when required;
- Current unrestricted Driver Licence.

Qualifications:

A Degree, Diploma or Associate Diploma in Business Administration, Compliance or Law related field or equivalent experience.

Breakdown of weekly hours spent on each function:

| Function | Weekly Hours |
|-------------|--------------|
| Leadership | 4 |
| Operational | 16 |
| Compliance | 16 |
| Risk | 1 |
| Safety | 1 |