



Flo Energy Australia Pty Ltd

AER Gas Retail Authorisation Application

Date Submitted: November 2025



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Introduction

Background

This is an application by Flo Energy Australia Pty Ltd (Flo Energy) for a retail licence for the sale of gas in those states that have adopted the National Energy Consumer Framework (NECF).

As a wholly owned subsidiary of Flo Holding Pte Ltd, Flo Energy Australia brings significant experience to the energy sector. We firmly believe that our entry into the retail gas market will be highly beneficial for energy consumers in terms of price, reliability, and service quality.

Recognising the importance of a reliable energy supply, we have a well-structured risk management system in place. Additionally, our access to the resources and expertise of the Flo Group enables us to effectively identify, assess, and manage risks that could impact our customers. Our focus on technological advancements and operational efficiency further supports our ability to be a dependable and affordable gas retailer for consumers.

At Flo Energy Australia, our aim is to deliver high-quality energy services to consumers. We can achieve this by building upon the Flo Group's proprietary energy technology platform to provide innovative solutions that enhance the overall quality of energy services.

Our commitment is to offer competitive pricing and product options to consumers by leveraging our experience, knowledge and investment in our own technology. We are confident that our presence will have a positive and lasting impact on the long-term interests of energy consumers.

Flo Energy Singapore is the largest independent electricity retailer in Singapore, offering 100% certified renewable electricity and services to small and large business customers. Together, the group of entities ("Flo Group"), owners and Management have significant experience in the energy industry.

The Flo Group develops and operates our own proprietary energy technology platform built with a deep understanding of the energy sector to serve our customers best. The platform is based on a scalable, cloud-based advanced architecture and runs continuous deployment. By investing in technology, we bring our costs down, and we share the savings with our customers to realise.

Using our technology platform approach, experience and execution power, Flo Group aims to become a leading renewable energy retailer in Asia and commercialise our solutions to realise our mission. The Flo Group desires to commence its regional expansion in Australia.

The Application

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

This application consists of the following:

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

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

1. Part One: Required information – general particulars

	Required information	Response from Flo Energy Australia
1	Fuel type Please enter either Electricity (E), Gas (G) or Dual (D)	Gas (G)
2	Existing or Start-up business	Existing
3	Confidential documents - Please enter either - Yes or No	No
4	Your legal name	Flo Energy Australia Pty Ltd
5	Your trading name if different to your legal name	Not applicable
6	ABN or ACN	ABN: 59 664 209 330 ACN: 664 209 330
7	A registered business address and address for correspondence	Suite 2, Level 25, 100 Miller Street, North Sydney, NSW 2060
8	A nominated contact person, including their position in the organisation and contact details	Name: Gavin Lewis [redacted]
9	The date you intend to commence retailing energy	Flo Energy Australia intends to commence energy retail gas operations on receipt of the Authorisation
10	The nature and scope of operations proposed (business model and size of operations, volume of customers)	<p>Flo Energy Australia intends to retail gas to Residential, SME and C&I customers in Australia.</p> <p>The Flo Group operates its own in-house developed energy tech platform built specifically for the energy sector.</p> <p>It uses the best practices from over 10 years of energy retail experience in the Netherlands and Singapore to serve our customers best.</p> <p>The system is based around a scalable, cloud-based advanced platform capable of unlimited scale. For the Australian market, it is being tailored to meet the local legislative requirements and technical integrations with AEMO.</p> <p>Our Flo Energy Australia Business Plan (Annexure C1) outlines in greater detail our operations, the intended target market and our business goals. Further supporting detail regarding the size of operations and volume of customers is contained in the Financial Model (Annexure C3)</p>
11	The jurisdictions in which you intend to retail energy	NECF Jurisdictions (SA, NSW, QLD, SA, ACT and Tas)
12	The type of customers you intend to supply (for example, small customers, small market offer customers or large customers as defined in s. 5 of the Retail Law)	Flo Energy Australia intends to retail to residential and small and large commercial customers.

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

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

Criterion from Guideline	Required information	Response from Flo Energy Australia
Criterion 1	Details of your (or any related parties) previous experience as an energy retailer	<p>Flo Energy Australia has recently been granted a retail electricity and gas licence to operate in Victoria and a retailer authorisation for retailing electricity within the NECF jurisdictions. Flo Energy Australia does not have previous experience as a gas retailer (in the gas market).</p> <p>Flo Energy Australia is part of an international group with significant electricity retail experience and leverages the skills and experience of its related companies and employees (see below), and the Australian Management Team who has extensive experience in the gas market.</p> <p>Entities/experience within the group (detailed further below) include:</p> <ul style="list-style-type: none"> ● Flo Energy Singapore Pte Ltd (Singapore) ● Flo Holding Pte Ltd CEO is also the founder of Vandebron Energie B.V (Netherlands) that has ~200k gas customers <p>For its intended gas retailing operations in Australia, Flo Energy will leverage the significant experience of its Australian-based senior management team in the energy market, consisting of:</p> <ul style="list-style-type: none"> - General Counsel - Regional Head of Compliance and Risk, - Head of Customer Operations, - Head of Market Operations, - Head of Finance, - Trading and Portfolio Management Lead, - Channels and Partnership Lead <p>Flo employees have extensive backgrounds in retailing gas from their previous roles with energy retailers. This collective expertise ensures the applicant is well-equipped to manage energy compliance and risk management effectively, which are key areas of concern identified by GRO Energy Australia.</p> <p>Please refer to Annexure A5 for the CVs of all providers and individuals involved in Flo Energy Australia, provided on a commercial in-confidence basis. Other than as provided and explained in this application, other service</p>

		providers will be engaged on an ad hoc basis, for example to provide specific legal services.
1.1	The date and location of previous operations (this should include related entities (if applicable))	<p><u>June 2020 – Now, Singapore (Flo Energy Singapore).</u></p> <p><u>December 2013 – December 2019, Netherlands (Vandebron Energie B.V.)</u></p> <p>The Flo Group is co-founded by Matthijs Guichelaar (CEO of Flo Energy Singapore Pte. Ltd.), who previously founded and led Vandebron Energie B.V., one of the biggest renewable energy retailers in the Netherlands.</p>
1.2	The form/s of energy sold	Electricity
1.3	The scale of operations (including the number and size of customers)	[redacted]
1.4	A description of how the retail activities were conducted	<p>In both countries retail activities were conducted under the respective licence requirements.</p> <p>For the Netherlands, this was both B2B as well as B2C. For Singapore, this is currently only B2B.</p>
Criterion 2	Details of any other relevant retail or energy market experience	<p>The key staff have significant experience in the energy market. Please refer to the respective CV's (Annexure A5).</p> <p>In particular, Flo Energy Australia's Director of Trading and Portfolio Management (Matthijs Begeer) has worked for Energy Global, a risk and balance responsible service provider to various retailers across the Netherlands.</p> <p>Flo Energy has sufficient experience in the following key areas, to assist in carrying out its functions:</p> <ul style="list-style-type: none"> ● Billing and technical infrastructure: Flo Energy Australia will utilise the existing technology applications present in the Flo Group. This platform has already shown its competence in the Dutch and Singaporean markets for electricity billing. For Australia, this platform will also manage our gas billing and is being extended with the required interfaces to communicate with the systems of AEMO and all relevant regulatory obligations. The Head of Market Operations, Head of Customer Corporations and the Compliance Team, along with the Technology Team is working on the gas billing system implementation. <p>For more information, please see Business Plan (Annexure C1). Further please refer to Annexures A9 to A11. A sample business customer invoice has been provided (Annexure A20). Please</p>

		<p>also refer to Annexure B27- Billing and Collections System Requirements.</p> <p>The billing system used for billing customers will comply with all applicable regulatory obligations (see for example the Obligations Register at Annexure B10).</p> <ul style="list-style-type: none"> Compliance: Flo Energy Australia Pty Ltd is committed to complying with all relevant regulations impacting our operations and has an experienced local Head of Compliance and Risk as well as a Compliance Manager. Compliance Quarter has also been engaged to support our compliance program and have a Compliance Policy aligned with ISO 37301:2023. For more information, please see Business Plan (Annexure C1). Wholesale risk management: Flo Energy Australia has a comprehensive risk management plan in place. For more information, please see Business Plan (Annexure C1).
Criterion 3	Where you do not have previous energy market experience, how you intend to bring this experience into your business	<p>Flo Energy Australia, while relatively new to the gas retail market, leverages significant experience from within our group and through strategic recruitment to ensure compliant and effective operations.</p> <p>To facilitate our entry into the gas market, we have recruited key personnel with extensive experience in gas retailing from other energy retailers. This includes our Managing Director, Head of Compliance and Risk, and Customer and Market Operations employees, all of whom have demonstrated expertise in gas market operations.</p> <p>Should we identify the need for further external expertise, we will engage suitably qualified contractors in line with our Third Party Management Policy (Annexure B4) and our Third Party Supplier or Software Selection Process (Annexure B24). This ensures that we can seamlessly integrate additional expertise into our business operations as needed.</p> <p>Flo Energy Australia is committed to leveraging our collective knowledge and industry best practices to provide reliable, high-quality gas services to our customers, ensuring compliance with all regulatory requirements.</p>
Criterion 4	An organisation chart showing the structure of your organisation (this should include Board members and Operational Managers)	<p>Please see Annexure A3 for a copy of the Flo Energy Australia Organisational Chart</p> <p>Flo Energy Australia roles will initially be carried out by Australian based employees with Australian energy market experience and members of the regional team, and will expand post-authorisation as the company grows.</p>

		The organisational chart shows the positions currently filled and those to be filled in the next 1-3 years. For the roles not yet filled, Flo Energy Australia has drafted position descriptions (see Annexure A8).
Criterion 5	The number of employees, broken down by business unit or other relevant classification (are employees shared with any other entities)	<p>Please see Annexure A3 for a copy of the Flo Energy Australia Organisational Chart, which provides a tabulation of the planned resourcing configuration from initial launch to approximately 24 months of operations.</p> <p>We have on boarded an experienced senior management team and employees with the inclusion of experienced compliance professionals.</p> <p>In 2025, we aim to grow our team to an [redacted] in sync with our growth aspirations and business milestones. For an in-depth view of our recruitment approach and expansion phases, please refer to the "Team Structure and Hiring Step-Up Plan" in Annexure A3. This growth is driven by our projected expansion until 2025.</p> <p>For roles we're targeting to fill in the near future, their Job Descriptions can be found in Annexure A8.</p>
Criterion 6	A summary of qualifications, technical skills and experience of your officers, and the relevance of those skills and experience to meeting the requirements of the retailer authorisation (this may include a CV)	Please see Annexure A5 for a copy of the CV's for key staff within the organisation.

2.2. Third party involvement (Criterion 7)

Criterion from Guideline	Required information	Response from Flo Energy Australia
Criterion 7	Where you may be relying on a third party to provide staff and resources to meet the technical requirements of your retailer authorisation or to perform retail roles (such as operating phone centres or billing), you must -	<p>Flo Energy Australia will undertake its functions internally to meet the compliance and technical requirements supported by other entities in the Flo Group. The Flo Energy Australia internal functions include:</p> <ul style="list-style-type: none"> ● Compliance and Risk ● Market Operations ● Customer Operations ● Finance ● Marketing and Communications ● Sales ● Wholesale risk management; and ● Information Technology <p>Flo Energy Australia has engaged Compliance Quarter in support of preparing this application</p>

		<p>for authorisation and on a needs basis for future matters. A copy of the relevant agreement is provided (Annexure A17), capability statement (Annexure A17.1) and A17.2 for terms of contract</p> <p>Flo Energy Australia also has a list of third-party vendors we can engage for any specific business requirements if needed. Refer to (Annexure A5.2)</p> <p>All third-party supplies will be overseen pursuant to the Third Party Management Policy (Annexure B4) and Third Party supplier or software selection process (Annexure B24).</p>
7.1	State all functions and activities you propose to outsource	As stated above all functions will be performed in house. Compliance Quarter are assisting with the preparation of this application and will continue to assist Flo Energy Australia on an 'as needs' basis.
7.2	Provide a summary of the third party's experience in, and knowledge of, the relevant area	Please see Annexure A17.1 for the Compliance Quarter capability statement.
7.3	Provide evidence of the third party's technical capacity to meet relevant obligations	Please see Annexure A17.1 for the Compliance Quarter capability statement.
7.4	Provide evidence of controls in place to ensure the third party's compliance with the Retail Law and Retail Rules (this may include contracts, deeds and/or policies with other parties)	Please refer to the attached Third Party Management Policy (Annexure B4) explaining the controls implemented by Flo Energy Australia with respect to the engagement of third parties and also our Third Party Supplier or Software Selection process (Annexure B24) and Third Party Management Oversight process (Annexure B23).

2.3. Business plan (Criterion 9)

Please refer to **Annexure C1**, provided on a commercial in-confidence basis, a copy of the applicant's Business Plan. The assumptions made for the forecasts are contained in the Financial Model detailed in **Annexure C3**.

2.4. Compliance strategy (Criterion 9)

Flo Energy Australia's compliance strategy is governed by the Flo Group's Compliance Management Policy and Standard, which set out the organisational framework, expectations, and governance structures in place for compliance management. Flo Energy Australia is committed to an effective compliance program implemented in accordance with AS/ISO 37301 2023. Flo Energy Australia's Compliance Policy (**Annexure B2**) demonstrates the extent to which the standard has guided Flo Energy Australia. From a technical and security perspective, Flo Energy Australia will use the Flo Groups platform, which has obtained the ISO27001 certification.

Flo Energy Australia understands and will implement a range of measures to ensure compliance with regulatory obligations. The applicant's regulatory obligations include those under Energy Law

(including the National Energy Retail Law, National Energy Retail Regulations and various Victorian instruments), the *Telecommunications Act 1997*, the *Do Not Call Register Act 2006* and the Australian Consumer Law (as set out in Schedule 2 to the *Competition and Consumer Act 2010*). A detailed list of regulatory obligations applicable to the applicant is attached and marked **Annexure B10**, provided on a commercial in-confidence basis.

The board of Flo Energy Australia is responsible for setting and overseeing the corporate governance and compliance standards implemented by the Compliance Committee, consisting of a Member of the Board, our Compliance Lead and Country Managing Directors.

Ways that Flo Energy Australia will ensure compliance include:

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

Criterion from Guideline	Required information	Response from Flo Energy Australia
Criterion 9	Details of your compliance strategy	<p>Please refer to the statement above and the following attachments relating to compliance in various forms:</p> <ul style="list-style-type: none"> • Annexure B2: Retail Compliance Policy • Annexure B3: Retail Compliance Reporting Procedure • Annexure B5: Retail Complaints and Dispute Resolution Procedure • Annexure B6: Retail Risk Management Policy • Annexure B7: Retail Risk Register / Matrix • Annexure B8: Retail Customer Hardship Policy • Annexure B9: Internal Audit Policy

		<ul style="list-style-type: none"> • Annexure B11: Compliance Reporting checklist • Annexure B12: Retailer Website Checklist • Annexure B13: Performance Reporting Checklist • Annexure B14: Website Notices • Annexure B15: Code of Conduct • Annexure B17: Cookie Policy • Annexure B18: Privacy Policy • Annexure B19: Flo Employee Handbook (Australia) • Annexure B20: Internal Quality Control Manual • Annexure B21: Quality Manual • Annexure B22: Family Violence Policy
9.1	Demonstrating your knowledge and understanding of the obligations imposed on authorised retailers under the Retail Law and Retail Rules and applicable statutory, industry and technical requirements of the jurisdictions in which you intend to operate	Please find attached to this application an Obligations Register that has been developed by our external consultants Compliance Quarter (Annexure B10).
9.2	Outlining how applicable retailer authorisation obligations and statutory, industry and technical requirements will be met (including how compliance breaches will be identified and remedied)	<p>We refer you to the various annexures outlined above in Criterion 9 and attached, that demonstrate how the applicant will ensure compliance (including breach identification and remediation). Of particular relevance to these issues are:</p> <ul style="list-style-type: none"> • Annexure B2 Compliance Policy • Annexure B10: Obligations Register • Annexure B3: Retail Compliance Reporting Procedure • Annexure B11: Compliance Reporting Checklist
9.3	Including complaint and dispute resolution procedures, developed in accordance with Australian Standard AS/NZS 10002:2014 (AS ISO 10002-2006) (Customer satisfaction—Guidelines for complaints handling in organisations).	<p>Please refer to the Retail Complaints and Dispute Resolution Procedure (Annexure B5) that aligns with Australian Standard AS/NZS 10002:2014 (AS ISO 10002-2022) (Customer satisfaction - Guidelines for complaints handling in organisations)</p> <p>The applicant is committed to freely receiving and resolving complaints in an accessible and transparent way. In all instances, the applicant will:</p> <ul style="list-style-type: none"> • Freely accept complaints lodged on our website, in person, by telephone, email or letter;

		<ul style="list-style-type: none"> • Acknowledge any complaint received as soon as possible; • Begin an investigation into the reasons for a complaint within 24 hours of acknowledgement; • Keep the complainant updated about the investigation and any proposed resolution; • Notify the complainant as soon as possible of the outcome of our investigation and any proposal we have for resolution; and • Provide the complainant with the option of an internal review of their complaint if they are unsatisfied with the outcome of the investigation or the proposed resolution.
9.4	Demonstrating that any gaps in the skills and/or knowledge of staff have been identified and that appropriate steps have been taken to fill those gaps (for example, through recruitment or training).	<p>Flo Energy Australia has undertaken a holistic review of operations and has not noted any gaps in skill/knowledge of the current staff.</p> <p>Flo Energy Australia will continue to focus on increasing the number of local staff. In the coming months (and in line with the growth strategy), Flo Energy Australia has plans to recruit and train additional local staff.</p> <p>Recruitment, training and induction are covered in the Flo Employee Handbook (Australia) (Annexure B19)</p> <p>The Business Plan (Annexure C1) also reference ongoing monitoring in the "Skill and staff retention strategies" section</p>

2.5. Risk management strategy (Criterion 10 to 12)

Criterion from Guideline	Required information	Response from Flo Energy Australia
Criterion 10	A copy of your risk management strategy covering both operational and financial risks	<p>Please find attached to this application (Annexure B6) a copy of Flo Energy Australia's Retail Risk Management Policy covering both operational and financial risks.</p> <p>Please also refer to the Retail Risk Register / Matrix (Annexure B7), which provides further detail about the specific risks and management.</p>
Criterion 11	Evidence that your risk management and compliance strategies have been subject to an external assurance process (we would expect the external assurance process to be conducted by a suitably qualified and independent entity)	Please be advised that a copy of this report will be provided as soon as it becomes available.
Criterion 12	Any additional information which demonstrates your	Regarding consumer data protection, our Singapore Information Security Management System has already been assessed and

	<p>ability to manage risk and operate in accordance with the Retail Law objective, particularly the long-term interests of consumers (for example, copies of any retail contracts that you have developed)</p>	<p>certified to meet the ISO/IEC 27001:2013 standard (Annexure A11). Our system will be tailored and ready by our targeted retailing start date and scheduled for immediate assessment and certification.</p> <p>Regarding compliance with retailer-specific compliance obligations, Flo has developed a Retail Compliance Policy (Annexure B2).</p> <p>The analysis of market conditions and responses to the AER's additional information requirements are covered in Market Analysis Report (Annexure C2)</p>
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2.6. Agreements in place with key market players within the relevant jurisdictions (distribution businesses and AEMO) If agreements not finalised provide information as to negotiations (Criterion 13 to 15)

Criterion from Guideline	Required information	Response from Flo Energy Australia
Criterion 13	Evidence of any membership, or steps taken to obtain membership, of a recognised energy industry ombudsman scheme in the jurisdiction/s in which you intend to retail energy to small customers	<p>Flo Energy Australia is a member of the following Ombudsman Schemes:</p> <ul style="list-style-type: none"> • Energy and Water Ombudsman Queensland (EWOQ) • Energy and Water Ombudsman NSW (EWON) • Energy and Water Ombudsman SA (EWOSA) • Energy and Water Ombudsman Victoria (EWOV) <p>Please see attached (Annexure A6) for confirmation of membership.</p>
Criterion 14	Evidence of any agreements / arrangements in place with key market players within the jurisdictions in which you intend to operate. This includes, but is not limited to, distribution businesses and AEMO. Where agreements / arrangements have not been finalised, you should provide details of any negotiations or steps that have occurred to date and when you expect agreements / arrangements to be completed	<p>Flo Energy Australia has made contact with AEMO to introduce the business and is in the process of seeking a market customer status. Please see Annexure C12 for the copy of communications with AEMO.</p> <p>[redacted]</p>

14a	If you intend only to onsell energy you should provide details of the back-up arrangements you have in place in case your business fails	Not applicable. Flo Energy Australia does not intend to on-sell energy purchased from an authorised retailer, so at this stage, back-up arrangements are not considered necessary.
Criterion 15	Any additional information that will help us assess your organisational and technical capacity	<p>Flo Energy Australia, as a subsidiary of Flo Holding, has the financial resources provided by its parent company and the benefit of the Flo Groups' significant energy market experience.</p> <p>Flo Energy Singapore, a subsidiary of Flo Holding, has a proven track record of market participation, including making sustainable returns during the global energy crisis and managing market reforms. There have been times in the market when Flo Energy Singapore was the only retailer offering fixed-priced plans to C&I customers.</p> <p>With access to people, software platforms and systems, and a governance framework that has allowed Flo Energy Singapore to operate successfully, Flo Energy Australia is set up for sustainable success.</p> <p>The analysis of market conditions and responses to the AER's additional information requirements are covered in Annexure C2: Market Analysis Report.</p>



3. Part Three: Required information – financial resources

The applicant is a start up business. Below we address financial resources matters (Criterion 1 to 9).

Criterion from Guideline	Required information	Response from Flo Energy Australia
Criterion 1	<p><u>Existing businesses</u></p> <p>Copies of your audited financial reports for the past 12 months (note, we may ask for the previous two years' reports, if necessary). This information should include:</p> <ul style="list-style-type: none"> • All financial statements required by the accounting standards. • Notes to financial statements (disclosure required by the regulations, notes required by the accounting standards, and any other information necessary to give a true and fair view). 	<p>Having only just obtained its retail licences for electricity, Flo Energy Australia has only recently started trading and therefore does not have any audited financial reports.</p>
Criterion 2	<p><u>Existing businesses</u></p> <p>Evidence of long and / or short term credit rating/s (if available).</p>	<p>Flo Energy Australia does not have a credit rating.</p>
Criterion 3	<p><u>Start-up businesses</u></p> <p>Details and evidence of your current financial position (most recent financial year). For example, interim financial statements (statement of profit or loss, statement of cash flows, statement of financial position), current bank statements</p>	<p>Flo Energy Australia has only recently started operating so does not have any financial reports.</p> <p>However, the following documents demonstrate evidence of access to funds, and solid financial standing:</p> <ul style="list-style-type: none"> • Flo Energy Singapore bank statement - January 2025 - February 2025 (Annexures C8A and C8B) [redacted] • Audited Financial Statements of Flo Energy Singapore Pte Ltd FY2023 (Annexure C4) [redacted] <p>Please see (Annexures C8A and C8B) for bank statements and (Annexure C9) for the Facility Letter (Fully Executed) for Flo Energy Australia.</p>

Criterion 4	<p><u>Existing and Start-up businesses</u></p> <p>If you are part of a group of related companies, and/or party to a partnership, joint venture or alliance agreement with another company, and you are given financial support by that entity, you should provide -</p>	<p>Please see attached (Annexure A1) a copy of an ASIC extract for Flo Energy Australia.</p> <p>Flo Energy Australia is part of the Flo Group and is being provided financial support by parent entity Flo Holding Pte Ltd (via Deed of Guarantee).</p>
4.1	<p>Details of the ownership structure of the group (including relationships with group entities). If you are not a group but a standalone entity you should also provide details of your ownership structure.</p>	<p>Please see Annexure A2 for a diagram of the ownership structure of Flo Energy Australia, including relationships between entities in the Flo Group.</p>
4.2	<p>The contractual arrangements (e.g. alliance contracts, associate contracts, establishment contracts) that define relationships within the group—including shared resources (such as office space, staff, sales channel, any other resource), guarantees, revenue flows, obligations and/or responsibilities</p>	<p>Please see the following contractual arrangements between entities in the group:</p> <ul style="list-style-type: none"> • Annexure C6: Shared Services Agreement • Annexure C9: [redacted]
4.3	<p>Consolidated audited financial statements for the group</p>	<p>Please see attached the following:</p> <ul style="list-style-type: none"> • Annexure C4: Audited Financial Statements of Flo Energy Singapore Pte Ltd FY2023
Criterion 5	<p>A written declaration, within 6 months of the application being accepted by the AER (published), from your Chief Financial Officer, Chief Executive Officer or director/s stating you are a going concern and that the officer is unaware of any factor that would impede</p>	<p>Please see attached for the declaration addressing this criterion:</p> <p>Annexure D1: Criterion 5 Declaration (Financial)</p>

	your ability to finance your energy retailer activities under the retailer authorisation for the next 12 months. For unincorporated applicants, a written declaration should be provided by the person/s in effective control of the business	
Criterion 6	A written declaration, from an independent auditor/accountant or your principal financial institution stating that -	Please see attached for the declaration addressing this criterion: Annexure D2: Criterion 6 Declaration (Financial)(Accountant)
6.1	An insolvency official has not been appointed in respect of the business or any property of the business	Flo Energy Australia confirms that an insolvency official has not been appointed in respect of the business or any property of the business. (See Annexure D2)
6.2	No application or order has been made, resolution passed or steps taken to pass a resolution for the winding up or dissolution of the business	Flo Energy Australia confirms that no application or order has been made, the resolution passed or steps taken to pass a resolution for the winding up or dissolution of the business. (See Annexure D2)
6.3	They are unaware of any other factor that would impede your ability to finance your energy retail activities under the authorisation	Flo Energy Australia is unaware of any other factor that would impede its ability to finance its energy retail activities under the authorisation. (See Annexure D2).
Criterion 7	Details of any bank guarantees or arrangements or process to access additional capital	Please refer to (Annexure C9) [redacted]
Criterion 8	Forecast revenue and expenses for three to five years or to the point where your business is cash-flow positive, whichever is the latter. This forecast should include profit and loss, cash flow, and balance sheet and be consistent with your business plan and highlight all key	Please refer to (Annexure C3) for a financial forecast provided in excel. This covers profit and loss, cash flow, and balance sheet, highlights all key assumptions and risks, and is consistent with the Business Plan (Annexure C1). The additional stress test scenarios identified by the AER are also covered in this Financial Model. An explanation of how to view the scenarios, is contained in the Dashboard of the Financial Model (Annexure C3)

	assumptions and risks	
Criterion 9	Any additional information that will help us assess your financial capacity to operate as an energy retailer (this could include your ownership structure if you are a stand-alone entity).	<p>In response to the AER additional questions posed in response to the volatile market conditions of 2022, Flo Energy conducted a rigorous analysis of the issues.</p> <p>The analysis of market conditions and responses to the AER's additional information requirements are covered in (Annexure C2): Market Analysis Report</p> <p>[redacted]</p>



4. Part Four: Required information – suitability

Flo Energy Australia is a fit and proper entity to hold a retail authorisation. Neither itself, its related body corporates, its officers or associates have had any criminal or civil convictions. Below, we address suitability matters (Criterion 1 to 7))

Criterion from Guideline	Required information	Response from Flo Energy Australia
Criterion 1	For you (the applicant) and your associates, any other business where your officers have held an officer position and any other entity that exerts control over your business activities—details of -	Please refer to the individual responses below and the attached declarations
1.1	any material failure to comply with regulatory requirements, laws or other obligations over the previous 10 years, including infringement notices or other enforcement action (including voluntary administrative undertakings) being taken by a regulatory body.	There have been no such events. See Annexure D3: Criterion 1 Declaration (Suitability)
1.2	any previously revoked authorisations, authorities or licences held in any industry and the reason/s for the revocation	There have been no such events. See Annexure D3: Criterion 1 Declaration (Suitability)
1.3	any failed authorisation, authority or licence applications in any industry and the reason/s the application was unsuccessful	There have been no such events. See Annexure D3: Criterion 1 Declaration (Suitability)
1.4	any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry	There have been no such events. See Annexure D3: Criterion 1 Declaration (Suitability)
1.5	any situation/s where you (or an associate) have previously triggered the RoLR provisions of the	There have been no such situations. See Annexure D3: Criterion 1 Declaration (Suitability)

	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	
Criterion 2	Details of any offences or successful prosecutions under any territory, state, Commonwealth or foreign legislation (including, but not limited to, the <i>Australian Securities and Investments Commission Act 2001 (Cth)</i> , <i>Competition and Consumer Act 2010 (Cth)</i> and the <i>Corporations Act 2001 (Cth)</i>) relevant to your capacity as an energy retailer, or written confirmation that no offences have been committed against, or been prosecuted under, any such legislation. This information must be provided for -	There have been no such offences or prosecutions. See Annexure D4 : Criterion 2 Declaration (Suitability)
2a	your current director/s (or shadow / de facto director/s), and any other person that exerts control over your business activities	There have been no such offences or prosecutions. See Annexure D4 : Criterion 2 Declaration (Suitability)
2b	if your business is unincorporated, the person/s with effective control of the business	Not applicable.
2c	all persons who are responsible for significant operating decisions for your business	There have been no such offences or prosecutions. See Annexure D4 : Criterion 2 Declaration (Suitability)
Criterion 3	Upon request, a criminal history check conducted within the past 12 months for	The applicant is willing to provide this on request.

	persons listed under information requirement 2	
Criterion 4	Written declarations from your Chief Financial Officer (or Chief Executive Officer) -	Please refer to the attached declaration: Annexure D5: Criterion 4 Declaration (Suitability)
4.1	that members of your management team have not been disqualified from the management of corporations	As above. See Annexure D5: Criterion 4 Declaration (Suitability)
4.2	about the record of bankruptcy of your management team (including in any overseas jurisdiction)	As above. See Annexure D5: Criterion 4 Declaration (Suitability)
Criterion 5	Full names and current residential addresses of all your officers	Please see Annexure A1 - ASIC Extract for the names and addresses of Officers.
Criterion 6	Details of policies and procedures addressing the probity and competence of officers and any other key management staff	Please refer to the attached <ul style="list-style-type: none"> • Annexure B19: Flo Employee Handbook (Australia) • Annexure B15: Code of Conduct; • Annexure B16: WHS Policy; and • Annexure B9: Internal Audit Policy.
Criterion 7	Any additional information that will assist us in our consideration of the character and past performance of your officers. If there has been a compliance issue, how will this be addressed in your future operations	Please find attached documents which are relevant to this component of the application: <ul style="list-style-type: none"> • Annexure B2: Retail Compliance Policy • Annexure B15: Code of Conduct • Annexure B19: Flo Employee Handbook (Australia)



5. Annexures

Document	Descriptions	Confidential
Operational and Technical		
Annexure A1	ASIC Extract	No
Annexure A2	Flo Energy Group Structure Diagram	No
Annexure A3	Flo Energy Australia Organisational Structure	No
Annexure A5	CV's – Key Employees	Yes
Annexure A5.2	Third Party Vendor Services	Yes
Annexure A6	Ombudsman Scheme Membership	Yes
Annexure A8	Job descriptions	Yes
Annexure A9	Certification of Retailer Electronic Business Transaction System and Interface	Yes
Annexure A11	ISO / IEC 27001:2013 Flo Energy Singapore	Yes
Annexure A14	[redacted]	Yes
Annexure A14.2	[redacted]	Yes
Annexure A14.3	[redacted]	Yes
Annexure A16	SS&R audit report	No
Annexure A17	Compliance HUB agreement	Yes
Annexure A17.1	Compliance Quarter capability statement	No
Annexure A17.2	Compliance Quarter Terms and Conditions	Yes
Annexure A19	[redacted]	Yes
Annexure A20	Sample invoice	Yes
Annexure A22	High Level Technical Billing Architecture	Yes
Annexure A23	Customer Relationship Management	Yes
Annexure A26	[redacted]	Yes
Annexure A27	Agreement with Australian Gas Network	Yes
Annexure A29	Intertrust Services Agreement	Yes
Annexure A30	[redacted]	Yes
Annexure A31	[redacted]	Yes
Policies and Procedures		
Annexure B2	Retail Compliance Policy	No
Annexure B3	Retail Compliance Reporting Procedure	Yes
Annexure B4	Third Party Management Policy	No
Annexure B5	Retail Complaints and Dispute Resolution Procedure	No
Annexure B6	Retail Risk Management Policy	Yes
Annexure B7	Retail Risk Register / Matrix	Yes
Annexure B8	Retail Customer Hardship Policy	No
Annexure B9	Internal Audit Policy	Yes

Annexure B10	Obligations Register	Yes
Annexure B11	Compliance Reporting checklist	Yes
Annexure B12	Retailer Website Checklist	Yes
Annexure B13	Performance Reporting Checklist	Yes
Annexure B14	Website Notices	Yes
Annexure B15	Code of Conduct	Yes
Annexure B16	WHS Policy	Yes
Annexure B17	Cookie Policy	Yes
Annexure B18	Privacy Policy	No
Annexure B19	Flo Employee Handbook (Australia)	Yes
Annexure B20	Internal Quality Control Manual	Yes
Annexure B21	Quality Manual	Yes
Annexure B22	Family Violence Policy	No
Annexure B23	Third Party Management oversight process	Yes
Annexure B24	Third Party Supplier or Software selection process	Yes
Annexure B26	Wholesale Market Risk Management policy	Yes
Annexure B27	Billing and Collections System requirements	Yes
Business Plan and Financial Information		
Annexure C1	Business Plan	Yes
Annexure C2	Market Analysis Report	Yes
Annexure C3	Financial Model (MS Excel)	Yes
Annexure C4	Audited Financial Statements of Flo Energy Australia FY2023	Yes
Annexure C6	Shared Services Agreement	Yes
Annexure C8A	C8 Flo Energy Australia bank statement January 2025	Yes
Annexure C8B	C8 Flo Energy Australia bank statement February 2025	Yes
Annexure C9	[redacted]	Yes
Annexure C10A	[redacted]	Yes
Annexure C10B	[redacted]	Yes
Annexure C11	[redacted]	Yes
Annexure C12	Communication with AEMO	Yes
Annexure C18	AEMO accreditation for E-Hub	Yes
Declarations		
Annexure D1	Criterion 5 Declaration (Financial)	No
Annexure D2	Criterion 6 Declaration (Financial)(Accountant)	No
Annexure D3	Criterion 1 Declaration (Suitability)	No
Annexure D4	Criterion 2 Declaration (Suitability)	No
Annexure D5	Criterion 4 Declaration (Suitability)	No

Version Control

Version	Amendments	Author and Date
Version 1	Not applicable	CQ-Flo 24/03/2025



Flo Holding Group Structure Diagram





Flo Holding Group Structure Diagram

Flo Holding Pte. Ltd.
UEN/GST Reg No
202006024R

55B Amoy Street
Singapore 069881



3rd June 2025

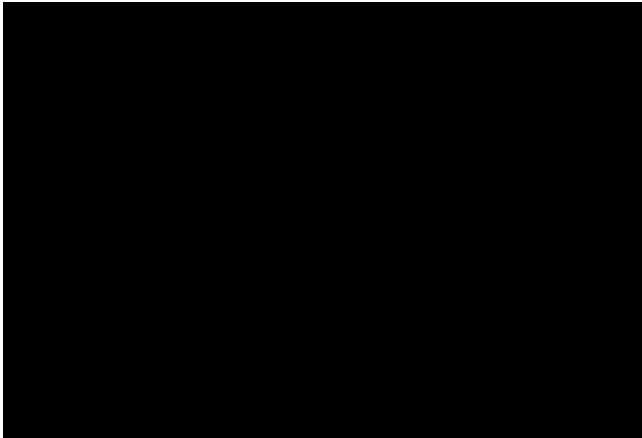
Flo Energy Australia Pty Ltd
Suite 2, Level 25,
100 Miller Street
North Sydney NSW 2060

**Re: Flo Energy Australia Pty Ltd Compliance and Risk Audit Action
Verification**

Further to Shared Safety and Risk's independent audit of Flo Energy Australia Pty Ltd's compliance and risk management systems in April 2025, I can confirm that we have reviewed Flo Energy's audit response and verified completion of the recommended actions through document review.

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

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



2025

COMPLIANCE QUARTER PROFILE



ISO 9001
QUALITY



WWW.COMPLIANCEQUARTER.COM.AU

WHY

Regulatory compliance services need to evolve at the same pace as the markets they serve.

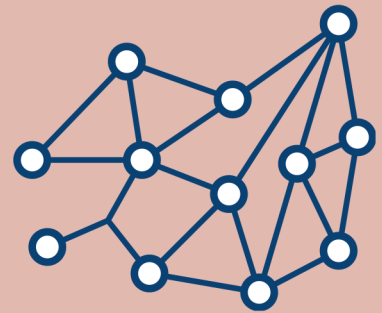
With energy expertise



With regulatory specialists



With ground-breaking systems



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

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

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

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

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

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

WHAT WE DO

Our practice delivers comprehensive compliance solutions encompassing compliance audits, gap analysis, training, coaching, management, and reporting, alongside bespoke regulatory projects including submissions, licence applications, and compliance reviews.

We employ an integrated approach leveraging technology, data analytics, and specialist expertise to achieve efficient, effective compliance outcomes that support business objectives whilst ensuring regulatory adherence.

Our methodology aligns with the recognised standard for compliance management systems, enabling clients to harmonise compliance initiatives with strategic goals, identify and assess compliance risks, implement appropriate controls, monitor performance, and cultivate robust compliance cultures.



Compliance Quarter has been invaluable in guiding the company to meet its compliance and reporting obligations

- CEO Energy Business



We are heavily invested in making sure our clients avoid regulatory penalties and enforcement action by implementing effective compliance controls. The results speak for themselves:

Cohort	Total Retailers	Penalised Retailers	% Penalised
All active retailers	84	18	21.43%
Compliance Quarter clients	15+	0	0%
Non-Compliance Quarter clients	69	18	26.09%



HOW WE WORK

- We deliver bespoke compliance solutions tailored to each client's specific regulatory environment and organisational structure.
- Our core services include: establishing comprehensive compliance frameworks; conducting thorough assurance reviews; managing breach reporting and regulatory responses; delivering targeted training solutions; developing or updating governance documentation; creating simplified obligation checklists; and drafting plain English materials for new regulatory requirements.
- This flexible service model enables clients to access precisely the compliance support they require, from comprehensive framework design to targeted interventions addressing specific regulatory obligations.

We deliver bespoke compliance solutions tailored to each client's specific regulatory environment and organisational structure.



HOW WE DELIVER

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

Titan is a centralised SaaS product where obligations are identified and managed.

01

Dynamic risk-based identification of regulatory obligations using LLMs and advanced methodologies.

02

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

03

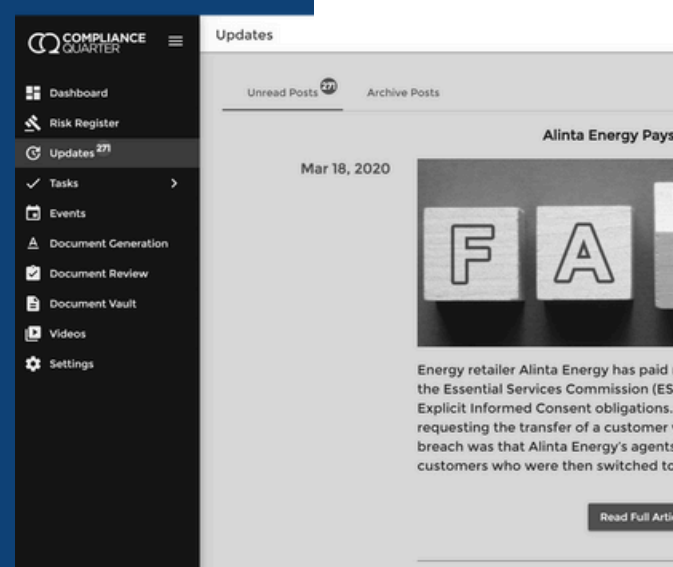
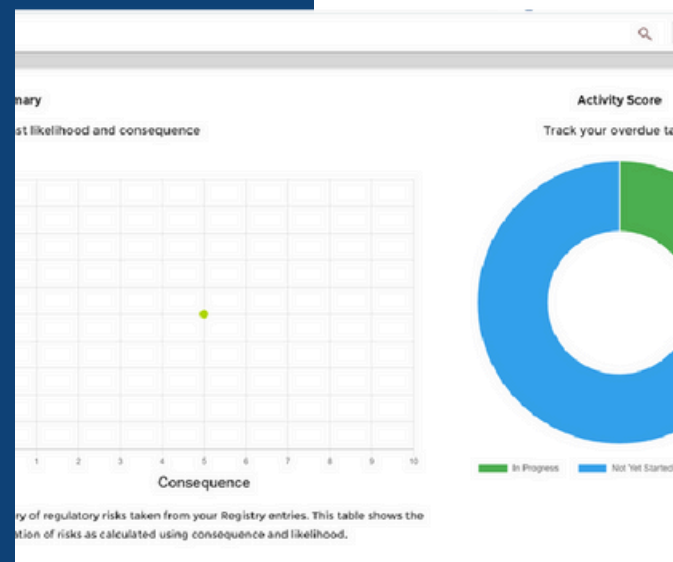
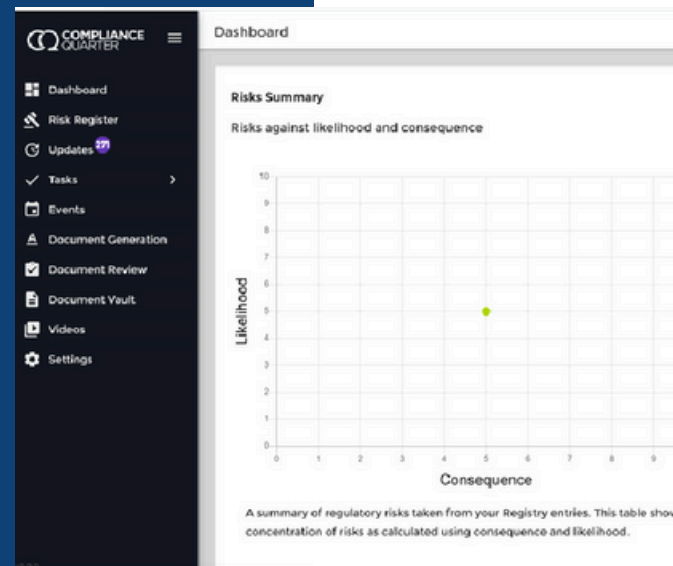
Automated document review: Titan accepts uploaded contracts and identifies red flags, risks that need to be reviewed and missing clauses.

04

An extensive vault of checklists and other resources including assessment tools.

05

Analysis of proposed changes to the regulatory framework with impact assessment.



CASE STUDIES



Case Study: Operationalising Obligations

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

Case Study: Retail Authorisations

We worked with an established international business looking to expand and offer retail supply within Australia. We successfully obtained electricity authorisations and licences so that the client could retail electricity in all of the Eastern States of Australia.

Case Study: Compliance Manager

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

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



CASE STUDIES

Case Study: Regulatory Compliance Training

We provided a comprehensive and tailored regulatory compliance training program for a new entrant in the electricity retail market. We covered topics such as the National Energy Retail Law and Rules, the Australian Consumer Law, and privacy and data protection. We delivered the training through a combination of online modules, webinars, workshops, and quizzes. We also created a training manual and a compliance handbook for the client's reference and guidance. The training program helped the client to build a strong compliance culture and awareness, and to prepare for their launch and ongoing operations.

Case Study: Data Breach Response

We assisted a business in responding to a data breach incident that affected their customers' personal information. We conducted a rapid and thorough investigation of the cause and extent of the breach, and advised the client on their notification and remediation obligations under the Privacy Act and the Notifiable Data Breaches scheme. We drafted and sent the required notifications to the affected customers and implemented measures to prevent future breaches. We also liaised with the relevant stakeholders on behalf of the client, and managed the reputation and legal risks arising from the incident.

Case Study: Compliance Audit and Improvement

We conducted a compliance audit and improvement project for an established energy retailer that was facing increased regulatory scrutiny and enforcement action. We reviewed their existing compliance policies, procedures, systems, and controls, and benchmarked them against the best industry practices and standards. We identified and prioritised the areas of improvement and risk mitigation, and developed a detailed and practical action plan for the client. We also supported the client in implementing the action plan, and monitored and reported on their progress and outcomes. We helped the client to enhance their compliance performance and maturity, and to restore their regulatory confidence and trust.

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



ISO 9001
QUALITY





AU Retail Compliance Policy

Flo Energy Australia Pty Ltd

Last updated 23 March 2023



AU Retail Compliance Policy

1 Introduction

1.1 To ensure long-term success, businesses must cultivate a culture of integrity and compliance. This requires a comprehensive approach to identifying, managing, and implementing regulatory obligations that is supported by strong leadership from the top. Establishing and maintaining a compliance management program is essential to achieving this goal, as it provides a framework for understanding and meeting the applicable regulatory requirements. Additionally, a compliance management program helps to ensure that the organization remains in compliance with applicable laws and regulations, and that any potential risks are identified and addressed in a timely manner.

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

1.3 Flo Energy Australia Pty Ltd is committed to an effective compliance management system designed in accordance with Compliance Standard ISO 37301:2023. ISO 37301:2023 is an international standard that provides guidance on managing compliance obligations. It outlines the principles and processes for establishing, implementing, maintaining, reviewing and improving a CMS. The standard is intended to help organizations of all sizes and sectors to identify, assess, manage and monitor their compliance obligations in a systematic and effective manner.

1.4 Flo Energy Australia's CMS is modeled on the following schematic:

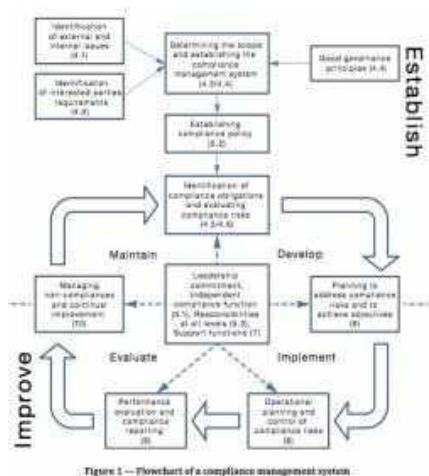


Figure 1: Flowchart of a Compliance Management System

2 Purpose of the Compliance Policy

2.1 The policy's primary purpose is to define the company's expectations in implementing a CMS.

2.2 Our CMS is designed to ensure compliance with Regulatory Obligations that impact, or have the potential to impact, Flo Energy Australia's operations.

2.3 Flo Energy Australia's obligations include those under the Energy Retail Code of Practice, the Electricity Industry Act, the Gas Industry Act, the Energy Law (such as the National Energy Retail Law, the National Energy Retail Regulations, and state derogations), the *Telecommunications Act 1997*, the *Do Not Call Register Act 2006*, the *Privacy Act 1988* and the Australian Consumer Law (as set out in Schedule 2 to the *Competition and Consumer Act 2010*)

2.4 The secondary purpose of the policy is to set out the procedures and strategies which will operate to ensure compliance standards and requirements are operating in accordance with the CMS.



**Flo Energy
Australia Pty Ltd**
ACN 664 209 330

Suite 2, Level 25,
100 Miller Street
North Sydney
NSW 2060

hello@floenergy.com.au
floenergy.com.au

3 Nature of The Compliance policy

3.1 The policy represents Flo Energy Australia's compliance philosophy, which is embedded in the CMS through its practices, operational policies, programs and processes. In their entirety, they demonstrate Flo Energy Australia's commitment to regulatory compliance, robust risk management approach and this is central to its zero appetite for regulatory & compliance risk.

3.2 Flo Energy Australia's operational processes provide the mechanisms required to implement its compliance policies and practices.

4 Responsibilities

4.1 The Board has overall responsibility for the policy and the CMS which includes selecting and overseeing the corporate governance and compliance strategies that are carried out, on a day-to-day basis, by the Compliance Committee.

4.2 A Compliance Committee will be formed by the Board, which will be responsible for overseeing the implementation of the compliance program by reviewing existing controls, reviewing proposed and new regulation, and defining the scope of internal audit activities.

4.3 The Compliance Committee will include the Managing Director, General Counsel, Chief Commercial Officer and Compliance Manager. The Compliance Committee must always include a member of the Board the Managing Director and General Counsel.

4.4 The Board member is responsible for reporting Compliance Committee decisions and minutes of meetings directly to the Board.

4.5 The Compliance Committee is responsible for:

4.5.1 Developing and implementing the CMS through the creation and operationalisation of policies, procedures and training programs;

4.5.2 Identifying new regulatory obligations and changes to existing regulatory obligations, along with ensuring that Flo Energy Australia Pty Ltd, through its employees and contractors, complies with these obligations;

4.5.3 Gathering information to investigate and resolve potential compliance breaches;

4.5.4 Reporting potential compliance breaches to the compliance committee, Board and the Australian Energy Regulator ('AER') and the Essential Services Commission ('ESC'), in accordance with Flo Energy Australia's CMS;

4.5.5 Reviewing, overseeing, and enforcing the CMS via auditing, monitoring, and training;

4.5.6 Directing General Counsel and the Compliance Manager to conduct compliance risk assessments as required, including audits, reviews, and remediation.

4.6 The Board owns this Compliance Policy and the CMS developed and implemented by the Compliance Committee.

4.7 General Counsel assists the Compliance Committee in identifying compliance risks and implementing appropriate controls.

4.8 Each Business Unit Manager ('BM') is accountable for compliance within their business units. Each BM has responsibility for ensuring that the unit staff understand the importance and relevance of the compliance program and are properly trained in procedures.

5 Commitment to Compliance

5.1 Flo Energy Australia's staff are required to follow all industry regulations as a condition of employment.

5.2 To ensure staff compliance, training programs will be instituted on induction and in an ongoing manner to ensure that staff are aware of their obligations and are notified of any changes to these requirements.

5.3 External contracts with strategic partners and contractors also require compliance with applicable laws and regulations.





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Suite 2, Level 25,
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hello@floenergy.com.au
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5.4 Flo Energy Australia Pty Ltd also recognises the importance of ensuring compliance when dealing with stakeholders, which include customers, regulators, government bodies, non-profit and community organizations and the wider community.

5.5 Flo Energy Australia Pty Ltd has a sharp focus on compliance and risk-assessment. This, together with its commitment to excellence, is what distinguishes Flo Energy Australia Pty Ltd in the industry.

5.6 Flo Energy Australia Pty Ltd is committed to ensuring that all staff, top to bottom, operate within a compliance culture at all times.

6 Resources

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

6.2 Resources currently used by Flo Energy Australia Pty Ltd include those described below.

7 Compliance Personnel

7.1 Compliance personnel are the staff responsible for overseeing the day-to-day implementation and maintenance of the policy and the CMS. Their activities include the following:

7.1.1 Interaction with regulators and other bodies to ensure they understand the Applicable Law together with pending changes to the Applicable Law and the impact of such changes on the Flo Energy Australia Pty Ltd business;

7.1.2 Training;

7.1.3 Creating and updating policies, standards, procedures and processes to ensure continued compliance with Applicable Law and best practice;

7.1.4 Engaging external consultants for advice or review where necessary;

7.1.5 Reviewing marketing material, contracts and other documentation; and

7.1.6 Planning compliance presentations to be included at Management meetings of Board meetings, as appropriate.

8 External Consultants

8.1 As part of its CMS, Flo Energy Australia Pty Ltd regularly obtains advice on compliance and legal issues from various external consultants including law firms, financial advisors and compliance professionals.

8.2 In addition, Flo Energy Australia Pty Ltd will procure at three-yearly intervals a third party audit of its compliance policy and CMS and conduct annual reviews of its legislative compliance. Outcomes are to be incorporated into Flo Energy Australia's compliance policy, CMS, and compliance training program.

9 Software

9.1 Flo Energy Australia's software systems have been developed with regulatory compliance and organizational effect as core requirements.

9.2 Flo Energy Australia's billing system will issue invoices and apply payments in accordance with relevant regulations.

9.3 Flo Energy Australia Pty Ltd utilises compliance software developed to manage compliance. This

[REDACTED]

10 Documentation

10.1 Flo Energy Australia Pty Ltd has developed documents, procedures and policies related to operational processes in order to ensure statutory compliance. These documents are provided to





Flo Energy
Australia Pty Ltd
ACN 664 209 330

Suite 2, Level 25,
100 Miller Street
North Sydney
NSW 2060

hello@floenergy.com.au
floenergy.com.au

employees to ensure implementation of practices that are in accordance with the prescribed regulations.

10.2 Flo Energy Australia's on boarding system includes the provision to new staff of all current policies, procedures and training which form part of the policy and the CMS.

10.3 Whenever a document has been changed or updated, Flo Energy Australia Pty Ltd will circulate the new document to all staff together with training where necessary.

10.4 Compliance Risks are documented in a regulatory risk assessment report, which is generated manually, or via the Risk Assessment Tool.

11 Obligations Register



11.2 Flo Energy Australia Pty Ltd operates in a highly regulated environment. General Counsel and the Compliance Manager are responsible for identifying all relevant compliance obligations and publishing them in the Obligations Register.

11.3 The Obligations Register will be updated on the basis of changes to laws and other compliance obligations. This will be achieved by:

- 11.3.1 being on the mailing list of relevant regulators;
- 11.3.2 maintaining membership of industry bodies;
- 11.3.3 subscribing to relevant information services;
- 11.3.4 attending industry forums and seminars;
- 11.3.5 monitoring the website of regulators; and
- 11.3.6 monitoring proposed regulation and decisions of courts and tribunals.

12 Compliance Risk Assessment

12.1 Risk assessments are conducted in accordance with the relevant standard ISO 37301:2021 and in particular 4.6 *Identification, analysis and evaluation of compliance risks*.

12.2 Compliance risks will be reassessed whenever there are:

- 12.2.1 New or changed activities, products or services;
- 12.2.2 Material changes to the structure or strategy of Flo Energy Australia Pty Ltd;
- 12.2.3 Significant external changes, such as to financial-economic circumstances, market conditions, liabilities, and client relationships;
- 12.2.4 Changes to compliance obligations; and
- 12.2.5 Non-compliance.

12.3 An overview of the risk assessment process is shown in Figure 2 below.

12.4 As the context is further defined, risks are identified, monitored, and controlled. Risk assessment is intended to be a process of continual improvement.

Figure 2: Risk Assessment Process





**Flo Energy
Australia Pty Ltd**
ACN 664 209 330

Suite 2, Level 25,
100 Miller Street
North Sydney
NSW 2060

hello@floenergy.com.au
floenergy.com.au

Source: Chartered Secretaries of Australia

12.5 As a function of General Counsel's risk management role, regular updates are provided to the compliance committee and Board via Management.

12.6 A number of compliance risks cannot be controlled, including human error. Therefore, Flo Energy Australia Pty Ltd actively seeks to identify and reduce the likelihood of residual risks and monitor remaining risks.

12.7 Residual risks that are identified in the compliance risk assessment must be reported to Management and the Board, as appropriate.

13 Training and Assessment

13.1 The aim of compliance training and assessment is to reinforce in all staff the understanding that regulatory compliance is core to Flo Energy Australia's operations.

13.2 Business Unit Managers provide training opportunities to their staff to address initial, continual and unique requirements.

13.3 Such training is to be developed by General Counsel and the Compliance Manager following the identification of a need for such training from the Compliance Risk Assessment report; the implementation of new laws, codes, or guidelines; and upon request from the Compliance Committee.

13.4 External training providers will be utilised where appropriate.

13.5 All training records will be kept for the purposes of organisation and accountability.

13.6 Compliance retraining will be undertaken whenever there is:

13.6.1 Material change of position or responsibilities – affected staff only;

13.6.2 Material changes in internal policies, procedures or processes – all staff;

13.6.3 Material changes in organisational structure, where this change results in new policies or reporting lines – affected staff only;

13.6.4 Changes in the compliance obligations – all staff;

13.6.5 Changes in activities, products, or services – affected staff only; and

13.6.6 Whenever a breach is identified – relevant team or teams.

14 Employing Qualified Staff

14.1 Flo Energy Australia Pty Ltd will ensure that all staff have the qualifications and experience necessary to be competent in their roles and the commitment to function in compliance with all applicable laws. For example, employees working in legal or compliance areas must have, as a minimum, a Bachelor degree in law and two years of relevant experience.

14.2 Performance reviews are mandatory for all levels of staff and include analyses of positions to determine the currency of position descriptions governing work roles. Staff promotions and retention are dependent on commitment to regulatory compliance.

14.3 In performance reviews, training and development requirements of staff will be identified including those relating to statutory obligations, compliance and the minimisation of risk.

15 Monitoring Performance

15.1 Flo Energy Australia Pty Ltd will develop performance and compliance criteria based on the requirements and definitions provided by the regulators.

15.2 Flo Energy Australia Pty Ltd will develop performance and compliance criteria based on the requirements and definitions provided by applicable regulators.

15.3 In the avoidance of doubt, any potential breaches are reported upon, irrespective of risk rating.

15.4 Flo Energy Australia Pty Ltd will implement reporting procedures (and, where authorised by applicable law, anonymous reporting) for actual or suspected breaches of applicable law.





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hello@floenergy.com.au
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15.5 All staff must use the Regulatory Reporting Tool (online [here](#)) (see Schedule A for introductory email), and must provide a complete description of the breach, including suspected potential breaches, and any corrective action to date. Submissions using the Regulatory Reporting Tool must be actioned by the Compliance Manager.

15.6 Flo Energy Australia Pty Ltd will implement appropriate procedures for investigating any such report and providing related reports to Management or the Board, as appropriate.

15.7 Specifically, all staff are required to report actual or suspected compliance breaches to the Compliance Manager, who will, upon investigation, escalate confirmed breaches to Management.

15.8 Management, in consultation with General Counsel, will then conduct a review of the breach that has been brought to its attention and determine if:

15.8.1 It needs to be reported to a regulatory body;

15.8.2 It needs to be reported to the Board; and

15.8.3 Further remediation action is required.

15.9 In addition to compliance reporting, complaints management and review are an essential part of compliance monitoring and quality improvement. Complaints provide insight into the various issues faced by customers and the areas that need to be addressed.

15.10 On a quarterly basis, Flo Energy Australia Pty Ltd has an obligation to report on the number and categories of complaints received to the relevant jurisdictional regulators as set out in the AER's Compliance Procedures and Guidelines and the Essential Service Commissions' ('ESC') Compliance and Performance Reporting Guideline.

15.11 Reports prepared pursuant to the AER's Compliance Procedures and Guidelines and the ESC's Compliance and Performance Reporting Guideline will be reviewed by General Counsel. The Compliance Manager may develop recommendations to Management resulting from such review including, for example, to strengthen compliance controls in relation to a specific area identified within a complaint.

16 Remedial Action and Controls

16.1 Remedial actions taken in response to individual incidents, including compliance breaches, will be recorded and reported in the compliance reporting software. Remedial actions taken in response to systemic or serious breaches will be reported to the Board, as determined by Management, in consultation with General Counsel.

16.2 In consultation with the compliance committee, General Counsel will establish controls to reduce the likelihood of breaches, which include, for example, training and guidance materials; compliance controls will also be built into third-party contracts as necessary

16.3 Where risk cannot be minimised to a sufficient degree using a control, the risk may be transferred to a third party by a standard contract or contract of insurance. Despite the existence of external contracts, in cases where Flo Energy Australia Pty Ltd has the obligation for compliance, it assumes ultimate responsibility.

16.4 General Counsel will review existing controls on an ongoing basis to ensure their continuing effectiveness and relevance.

17 Provision of Updates and Advice

17.1 General Counsel is responsible for notifying relevant staff of new or updated compliance requirements and delivering appropriate training programs when major changes are introduced. The methods of delivery must be appropriate to the nature and complexity of the update.

17.2 Compliance obligations are reviewed on an ongoing basis. Flo Energy Australia Pty Ltd subscribes to a number of regulatory news feeds, including those offered by third parties. These third parties include law firms, SAI global, and the regulators themselves.

17.3 Flo Energy Australia's staff will play an active role in the development of new compliance obligations by attending and participating in industry events and consultations conducted by regulators and reviewing, at reasonable intervals, on-line information on regulations and their currency. The aim of this participation is to contribute to an improved regulatory environment for the company and beneficial outcomes for consumers and the community.





**Flo Energy
Australia Pty Ltd**
ACN 664 209 330

Suite 2, Level 25,
100 Miller Street
North Sydney
NSW 2060

hello@floenergy.com.au
floenergy.com.au

18 Review

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

19 Publication

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

Version Control

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Schedule A:

Email to staff introducing the Regulatory Reporting Tool

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

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

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

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

All staff must report using the tool on any potential breaches. [REDACTED]





Third Party Management Policy

Flo Energy Australia Pty Ltd

Last updated 23 March 2023





Flo Energy
Australia Pty Ltd
ACN 664 209 330

Suite 2, Level 25,
100 Miller Street
North Sydney
NSW 2060

hello@floenergy.com.au
floenergy.com.au

1 Introduction

- 1.1 Flo Energy Australia Pty Ltd is in the business of retailing electricity and gas in Australia for commercial and residential customers.
- 1.2 Flo Energy Australia Pty Ltd relies on selected third-parties in its business operations.
- 1.3 Flo Energy Australia Pty Ltd wants to ensure that all third-party vendors engaged to provide services are aware of, and comply with, Flo Energy Australia Pty Ltd's obligations.

2 Third party risk management plan

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

3 Selection of third-party suppliers

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

4 Identification of compliance issues

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

5 Notification of a compliance breach

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



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- 5.5 The Compliance Manager will present the report to the board and the board must agree to the action.
- 5.6 The board may agree with the proposed course of action or require an alternative course of action.
- 5.7 The Compliance Manager will be responsible for ensuring that the relevant course of action is undertaken.
- 5.8 The Compliance Manager will be responsible for reporting to the board the progress of the course of action and any further actions which may be required.

6 Review of third-party vendor procedures

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

7 Ongoing monitoring

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

8 Documentation and reporting

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





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Annexure A: Third Party Vendor Management Plan

1 Third party risk management process

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



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

2 Planning

- 2.1 Before entering into a third-party relationship, the senior management team will develop a plan to manage the relationship.
- 2.2 The plan will be commensurate with the level of risk and complexity of the third-party relationship.
- 2.3 The plan will consider the following:
 - 2.3.1 assessment of the inherent risk in the activity to be undertaken by the third-party;
 - 2.3.2 outline the strategic purposes (e.g. reduce costs, leverage specialised expertise or technology, augment resources, expand or enhance operations), legal and compliance aspects, and inherent risks associated with using third parties, and discuss how the arrangement aligns with Flo Energy Australia Pty Ltd's overall strategic goals, objectives, and risk appetite;
 - 2.3.3 assess the complexity of the arrangement, such as the volume of activity, potential for subcontractors, the technology needed, and the likely degree of foreign-based third-party support;
 - 2.3.4 determine whether the potential financial benefits outweigh the estimated costs to control the risks (including estimated direct contractual costs and indirect costs to augment or alter Flo Energy Australia Pty Ltd's processes, systems, or staffing to properly manage the third-party relationship or adjust or terminate existing contracts);
 - 2.3.5 assess the nature of customer interaction with the third party and potential impact the relationship will have on Flo Energy Australia Pty Ltd's customers—including access to or use of those customers' confidential information, joint marketing or franchising arrangements, and handling of customer complaints—and outline plans to manage these impacts;
 - 2.3.6 Assess the extent to which the activities are subject to specific laws and regulations (e.g., Privacy Act, Competition and Consumer Law, Do Not Call Register requirements, Retail Law and Rules); and
 - 2.3.7 Detail how Flo Energy Australia Pty Ltd will select, assess, and oversee the third party, including monitoring the third party's compliance with the contract.
- 2.4 The plan will be presented to and approved by Flo Energy Australia Pty Ltd board.



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3 Due diligence

- 3.1 Before entering into a third-party relationship, Flo Energy Australia Pty Ltd will undertake due diligence to ensure that the third-party's systems and policies align with the obligations which apply to an authorised energy retailer under the Privacy Act, Competition and Consumer Law, Do Not Call Register requirements, Retail Law and Rules.
- 3.2 The due diligence will consider the following aspects of the third-party business:
 - 3.2.1 that the strategies and goals of the third-party do not conflict with those of Flo Energy Australia Pty Ltd;
 - 3.2.2 that all necessary licences have been obtained;
 - 3.2.3 that there is sufficient expertise, processes, and controls to enable Flo Energy Australia Pty Ltd to remain compliant with Australian laws and regulations;
 - 3.2.4 conduct an ASIC and ACCC check to ensure the third-party is not in breach of any statutory obligations;
 - 3.2.5 conduct a search to ensure that the third-party is not subject to any financial distress, including having entered into a voluntary administration or having an outstanding statutory demand or winding up application on foot;
 - 3.2.6 evaluate the business experience and reputation of the third-party to ensure it has the experience and expertise to provide the service;
 - 3.2.7 evaluate the risk management and compliance policies in operation and ensure that they comply with all Australian laws and regulations. In particular, assess whether they comply with the obligations imposed on an authorised energy retailer. If they do not comply, assess whether the third-party is able and/or willing to amend their policies;
 - 3.2.8 evaluate the systems which are in place to protect the privacy of customers;
 - 3.2.9 review the technology and systems which will be used by the third-party to ensure that they are suitable for the functions which are to be undertaken by the third-party;
 - 3.2.10 evaluate the incident reporting processes in place and ensure that they are compliant with the requirements for notification under the National Energy Law and Rules. If they do not comply, assess whether the third-party is able and/or willing to amend their policies;
 - 3.2.11 evaluate the training programs which are in place and assess whether they can be adopted to incorporate necessary training which may be required under the Retail Law and Rules;
 - 3.2.12 assess whether the quote provide is in line with market rates; and
 - 3.2.13 ensure that the third-party has all necessary insurance policies in place.

4 Contract negotiations

- 4.1 Once a third-party has been selected and satisfactory due diligence has been conducted, the senior management team should negotiate a contract with the third-party.
- 4.2 The contract should address the following:
 - 4.2.1 nature and scope of the arrangement;
 - 4.2.2 regular compliance monitoring;
 - 4.2.3 performance measures or benchmarks;
 - 4.2.4 responsibilities for providing, receiving and retaining information;
 - 4.2.5 responsibility for compliance with applicable laws and regulations;
 - 4.2.6 confidentiality;
 - 4.2.7 dispute resolution;
 - 4.2.8 limits on liability;
 - 4.2.9 default and termination;



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- 4.2.10 customer complaints and hardship policy;
- 4.2.11 AER audits and provision of information;
- 4.2.12 Duration; and
- 4.2.13 fee for service.

4.3 The contract must be approved by Flo Energy Australia Pty Ltd's board.

5 Ongoing monitoring

- 5.1 Flo Energy Australia Pty Ltd will continue to monitor the provision of services by the third-party to ensure that it meets with the obligations contained in the Retail Law and Rules.
- 5.2 Flo Energy Australia Pty Ltd will assign the role of monitoring the performance of the third-party to the Compliance Officer.
- 5.3 Any breach of the obligations by the third-party are to be immediately reported by the Compliance Officer to senior management.

6 Termination

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

7 Documentation and reporting

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



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100 Miller Street
North Sydney
NSW 2060

hello@floenergy.com.au
floenergy.com.au

Version Control

Version	Amendment	Author and date
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]





Standard Complaints and Dispute Resolution Procedure

Last updated 14 March 2025

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1. Introduction

Flo Energy Australia Pty Ltd (**Flo Energy**) is an energy retailer operating in VIC, NSW, QLD, ACT, TAS and SA. This document sets out our procedures for accepting, recording, and resolving complaints.

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

2. Definition of complaint

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

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

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

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

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

3. Complaints management

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

4. Promoting our complaints management program

We will publish this Standard Complaints and Dispute Resolution Procedure on our website.

We are committed to promoting and ensuring the visibility of our complaints management program by:

Making this procedure available free of charge;

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

5. Responsiveness

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

In all instances, we will:

- 5.1. Freely accept complaints lodged on our website, or by telephone, email, or letter;
- 5.2. Acknowledge any complaint received as soon as possible;
- 5.3. Begin an investigation into the reasons for a complaint;
- 5.4. Keep you updated about the investigation and any proposed resolution;
- 5.5. Notify you as soon as possible of the outcome of our investigation and any proposed resolution.

6. Responsibilities

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

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

Top-level management of Flo Energy is responsible for:

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

7. Recording complaints

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

- 7.1. Your requested resolution
- 7.2. The date of your complaint
- 7.3. A description of your complaint
- 7.4. The expected date for a response or resolution
- 7.5. The established priority of your complaint

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

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

8. Monitoring and improving

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

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

9. A customer's right to complain

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

10. Internal and external escalation

At any time, you may request an internal escalation of your complaint, which will be granted. Complaints will also be escalated where they are complex, urgent, or sensitive. When your complaint is received, you will be informed that you have the right to

escalate it if you are dissatisfied with the process. Individual staff who manage complaints will be required to review the complexity, urgency, and sensitivity of all complaints and seek assistance from a supervisor or specialist where required.

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

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

11. Our commitment to customers

In all instances, we will:

- 11.1. Treat you with respect;
- 11.2. Take your complaint seriously;
- 11.3. Respect your privacy;
- 11.4. Manage your complaint with impartiality;
- 11.5. Properly investigate and report on your complaint;
- 11.6. Resolve your complaint with proper consideration to facts;
- 11.7. Provide the option of internal escalation or a referral to an energy ombudsman scheme when requested or appropriate; and
- 11.8. Ensure equal access to our complaints management program and fair resolutions.
- 11.9. You have rights under various laws, including the Competition and Consumer Act 2010 (Cth), and the Energy Law. We will ensure that those rights are respected.

12. Customer read estimates

If you are a "small customer" with an accumulation meter, you have the right to conduct your own meter reading if your bill is based on an estimate. This self-read is known as a "customer read estimate."

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

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

13. Contact us to lodge a complaint

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

Our contact details:

Freecall: 1800 573 388

Email: complaints@floenergy.com.au

Translating and interpreting service (TIS): 131 450

The National Relay Service NRS provides essential assistance to individuals who are hearing impaired, hard of hearing or have speech impairments. For help using this service, visit NRS or contact 133 677.

14. Contact details for the Energy Ombudsman Schemes

An Energy & Water Ombudsman is a free, independent, impartial body that investigates and resolves complaints about electricity and gas providers.

All our customers have the right to contact the Energy & Water Ombudsman in their state at any time for independent advice and assistance. However, we do hope you will contact us directly to allow us the opportunity to rectify any issues.

Energy and Water Ombudsman Victoria

Freecall: 1800 500 509

Translating and interpreting service (TIS): 131 450

Online: ewov.com.au/start-a-complaint

Email: ewovinfo@ewov.com.au

Energy and Water Ombudsman of NSW

Freepost: Reply Paid 86550, Sydney South NSW 1234

Free call: 1800 246 545 Free fax: 1800 812 291 complaints@ewon.com.au

Translating and interpreting service (TIS): 131 450

National Relay Service: 133 677 (for help using this service, visit [NRS](#))

Energy and Water Ombudsman Queensland

Freecall: 1800 662 837

Translating and interpreting service (TIS): 131 450

National Relay Service: 133 677 (for help using this service, visit [NRS](#))

Fax: (07) 3006 2670

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

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

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

Energy and Water Ombudsman South Australia

Freecall: 1800 665 565 National relay service: 133 677

Translating and interpreting service (TIS): 131 450

Post: GPO Box 2947 Adelaide SA 5001 Office address (strictly by appointment only): Level 11, 50 Pirie Street, Adelaide SA 5000

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

ACT Civil & Administrative Tribunal ACAT

Freecall: 02 6207 1740

Translating and interpreting service (TIS): 131 450

National Relay Service: 133 677 (for help using this service, visit [NRS](#))

Online: acat.act.gov.au/fees-and-forms/online-forms/energy-and-water-complaint-form

Email: acatenergyandwater@act.gov.au

Post: GPO Box 370 Canberra ACT 2601, Allara House 15 Constitution Avenue, Canberra City, ACT

Ombudsman Tasmania

Freecall: 1800 001 170

Translating and interpreting service (TIS): 131 450

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

Online: <https://www.ombudsman.tas.gov.au/home/contact-us>

Email: ombudsman@ombudsman.tas.gov.au

Post: GPO Box 960 Hobart TAS 7001



Hardship Policy

ACT | NSW | QLD | SA | TAS

Last updated 14 March 2025

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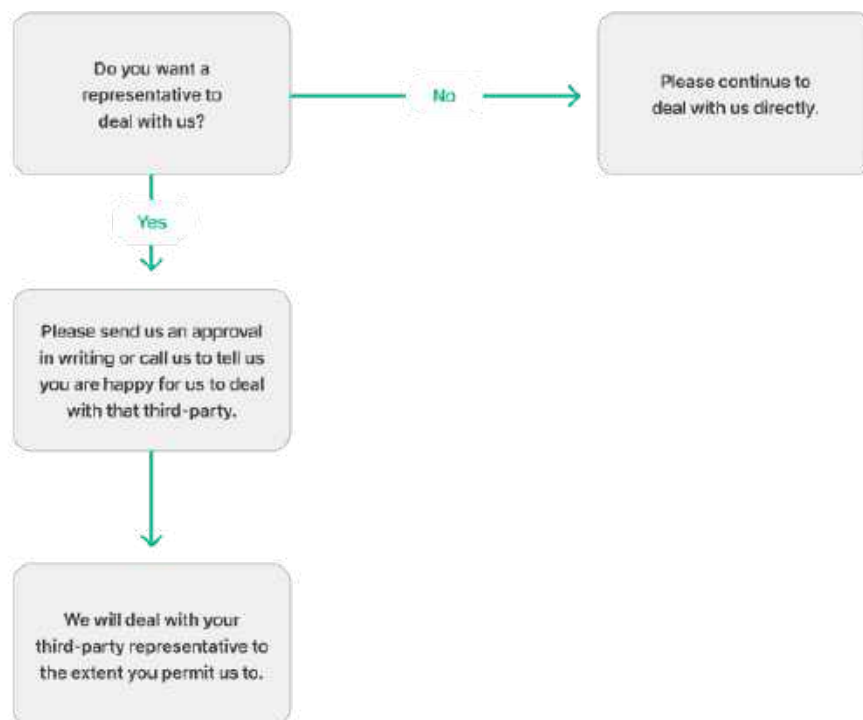
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1. Introduction

- 1.1. This Policy applies to all residential customers living in Queensland, New South Wales, the Australian Capital Territory, South Australia and Tasmania who find it hard to pay their energy bills due to hardship. You might experience hardship because of factors like:
 - 1.1.1. death in the family
 - 1.1.2. household illness
 - 1.1.3. family violence
 - 1.1.4. unemployment
 - 1.1.5. reduced income.
- 1.2. This Policy explains:
 - 1.2.1. what we will do to help you manage your energy bills
 - 1.2.2. how we consider your circumstances and needs
 - 1.2.3. your rights as a customer in our hardship program.
- 1.3. You can ask a support person to contact us, such as:
 - 1.3.1. a financial counsellor
 - 1.3.2. someone who helps you manage your energy bills.
- 1.4. We need your permission to talk to your support person.

Support person

- 1.5. You may give your permission for us to contact a third-party support person via whatever means are convenient for you.
- 1.6. If you would like a support person to represent you, you may request this at any time, by calling, emailing or writing to us. We will accept your consent via whatever means are convenient to you.
- 1.7. Where you have elected a support person to act on your behalf, we will engage with the support person as we would with you.
- 1.8. We will ensure that your instructions and consent are properly recorded, so you won't need to provide the same information repeatedly. The diagram below summarises our approach:



2. About our Hardship Policy

- 2.1. We support customers who are experiencing hardship. Electricity is an essential service, so we must do as much as possible to help you maintain access to your supply.
- 2.2. We have developed this Hardship Policy in accordance with the AER's Hardship Guideline to provide consistent and compliant support to all our customers. We believe early intervention is the best way to help customers who face financial difficulty pay their bills and prevent an accumulation of energy debt which could ultimately threaten a customer's energy supply.
- 2.3. We have systems in place to ensure that we meet our obligations with respect to customer hardship in:
 - 2.3.1. The National Energy Retail Law
 - 2.3.2. National Energy Retail Rules
 - 2.3.3. The AER Customer Hardship Policy Guideline
 - 2.3.4. This Customer Hardship Policy.

3. Our Hardship Commitment

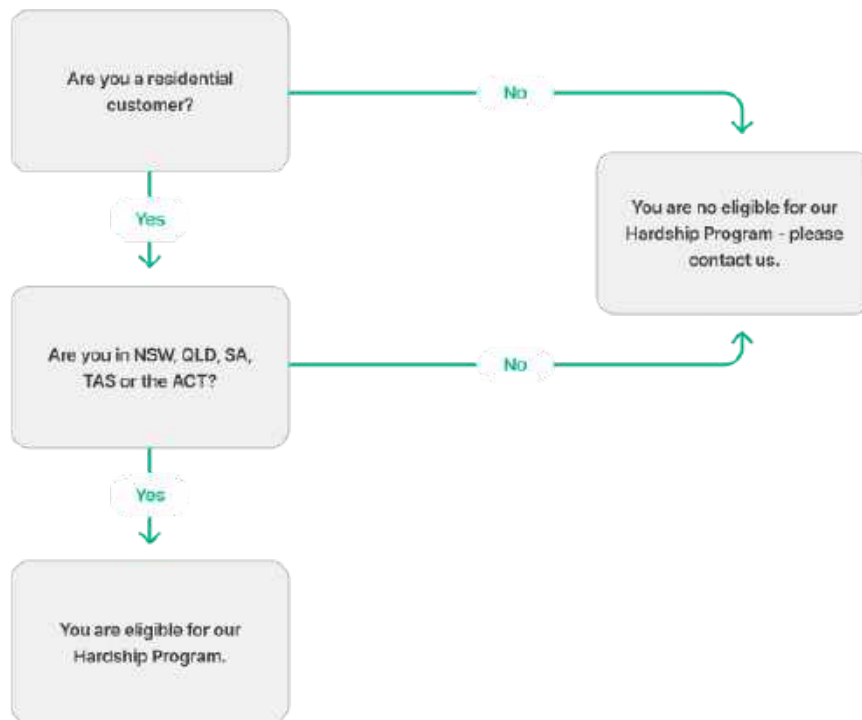
- 3.1. As a Flo Energy Australia customer, we will:
 - 3.1.1. Provide you with clear information in a timely manner on what assistance is available to you under this Policy, when it is reasonable to do so, including when you contact us.
 - 3.1.2. We will monitor payment histories for late or missed payments and proactively reach out to offer advice or assistance. We consider every interaction with our customers an opportunity to identify early signs of financial hardship.
 - 3.1.3. As soon as reasonably practicable, provide you with the assistance you are entitled to under this Policy.
 - 3.1.4. Be respectful, compassionate and treat your circumstances with sensitivity and respect for your privacy.
 - 3.1.5. Take into account all of your circumstances which we are aware of, and, on that basis, act fairly and reasonably in dealing with a customer who is experiencing payment difficulties due to hardship.
 - 3.1.6. Provide you equitable access to this Policy and ensure that it is consistently applied in a transparent way.
 - 3.1.7. Waive any late payment fees if you are enrolled in the Hardship Program.
 - 3.1.8. Maintain customer assistance programs, such as affordable payment plans.
 - 3.1.9. Regularly monitor your account during your participation in our Hardship Program, including quarterly reviews of your payment plan to make sure it remains affordable and you are receiving the right assistance at the right time.
 - 3.1.10. Be transparent, accessible, and communicate with you, your nominated support person, financial counsellors and community assistance agencies when necessary.
 - 3.1.11. Not disconnect your energy supply while you are in our Hardship Program.

4. Accessing our Hardship Policy

- 4.1. You can access a printable version or download an electronic copy of our Hardship Policy on the homepage of our website www.floenergy.com.au/support/hardship. If you are unable to access our website, we can provide you with a copy of this policy for free in another way. Please contact us if you would like us to provide you with a copy by email or send you a copy by post.

5. Eligibility for Flo's Hardship Program

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



- 5.5. If we decide that you are ineligible for our Hardship Program, we will contact you and let you know of the reasons why.
- 5.6. You have the option to exit the Hardship Program at any point. Should you choose to leave because you are switching to a different energy retailer or no longer need our energy services, we will reach out to discuss potential payment arrangements for any outstanding debts. We will ensure that any proposed arrangements align with the principles of our Hardship Policy, which include:
 - 5.6.1. Assessing your ability to pay
 - 5.6.2. Offering protection against debt collection activities
 - 5.6.3. Waiving late payment fees.

6. Re-entry into Flo's Hardship Program

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

7. What we will do to help you

- 7.1. We will tell you about our Hardship Program if:
 - 7.1.1. you tell us you are having trouble paying your bill
 - 7.1.2. you are referred to our program by a financial counsellor or other community worker
 - 7.1.3. we are concerned that you may be experiencing financial hardship.
- 7.2. We will recommend you speak to a staff member to help you join our Hardship Program if you have:
 - 7.2.1. a history of late payments
 - 7.2.2. broken payment plans
 - 7.2.3. requested payment extensions
 - 7.2.4. received a disconnection warning notice
 - 7.2.5. been disconnected for non-payment.
- 7.3. We can also support you to join our Hardship Program if you tell us:

- 7.3.1. you are eligible for a relief grant or other emergency assistance
 - 7.3.2. you have personal circumstances where hardship support may help. For example, death in the family or job loss.
- 7.4. You may have trouble paying your bills for different reasons. Please contact us so we can discuss your individual situation.
- 7.5. Our staff are specially trained to help you with hardship. Staff will:
 - 7.5.1. ask you a few questions about your circumstances
 - 7.5.2. work out if you can join the Hardship Program.
- 7.6. We will assess your application and let you know if you are accepted into our hardship program within 10 business days from receipt of the application.
- 7.7. If you are accepted into our Hardship Program, we will:
 - 7.7.1. tell you if you are on the right energy plan or if there is a better plan for you
 - 7.7.2. tell you about government concessions, relief schemes or energy rebates you may be able to receive
 - 7.7.3. give you ideas about how to reduce your energy use
 - 7.7.4. talk to you about a payment amount that suits your circumstances
- 7.8. We can send you a free copy of our Hardship Policy.
- 7.9. Our Hardship Policy will be sent to you via your preferred form of written communication.

8. Payment options

What we will do

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

- 8.10. If you miss a payment, we will contact you to see if you need help. We will contact you by your preferred form of communication to advise you of the broken payment plan, assistance available and next steps.
- 8.11. If we are unable to reach you, Flo will make a second attempt. If there's still no response after this, a third attempt will follow. Once we establish contact, we can discuss and adjust the plan as well as explore additional assistance options available.
- 8.12. If we are unable to establish contact, Flo will attempt further contact using other methods available. Additionally, we will notify you in writing of missed payment plans or failed direct debits. You will have 10 business days from our first contact attempt to get in touch with us. Failure to respond within this period will result in your removal from the Hardship Program, and our standard debt collection process will resume.

What you must do

- 8.13. Tell us if your situation changes and you can no longer make the payments in your plan. We can then review your payment arrangements.
- 8.14. Tell us if your contact details change.
- 8.15. We may stop helping you if you:
 - 8.15.1. stop making payments under your plan
 - 8.15.2. do not tell us when your contact details change.
- 8.16. If you have had two payment plans cancelled in the last 12 months because you did not follow your plan:
 - 8.16.1. we do not have to offer you another plan
 - 8.16.2. we might disconnect your energy.

9. Successful completion

- 9.1. If you have successfully completed a payment plan or have been able to meet all outstanding payment obligations to Flo Energy Australia Pty Ltd, you can request to be removed from the hardship program at any time.
- 9.2. Once confirmed, we will contact you confirming successful completion of the payment plan. You will then be returned to Flo Energy Australia Pty Ltd's standard billing and collection cycles.

Steps we will take

- 9.3. We will take the following steps to help you complete our Hardship Program:
 - 9.3.1. Adhere to our Hardship Commitments;
 - 9.3.2. Provide you with the supports outlined in this policy; and
 - 9.3.3. Communicate with you regularly.

Changing a payment plan

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

Leaving a payment plan

- 9.5. You can return to standard billing and collection cycles if you complete the payment plan or pay any previous bill arrears.
- 9.6. If you stop meeting your instalment payments Flo Energy Australia Pty Ltd will attempt to contact you by your preferred method as outlined under clause 8, to discuss whether changes need to be made to the original payment plan. We can reassess the original payment plan and make changes to help restore payments.
- 9.7. If, as a participant in the hardship program, you fail to make payments as per the agreed payment plan or refuse to engage with us, you will default back to our standard debt collections process.
- 9.8. When you are enrolled in the Hardship Program it is important that you notify us of any changes in your circumstances, such as relocating, altering your payment method, or if you foresee difficulty with future payments. Prompt communication enables us to provide support through various options, including:
 - 9.8.1. modifying your payment method, frequency, or instalment amounts
 - 9.8.2. seeking guidance from financial counselling services

9.8.3. strategies to decrease energy consumption

9.8.4. additional support possibilities

It is essential to respond to any contacts from us regarding further payment arrangements or past due payments, as non-response may lead to a discontinuation of assistance.

9.9. Disconnection and debt collection are Flo Energy Australia Pty Ltd's absolute last resort.

10. Other supports to help you pay your energy bill

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

What we will do

10.2. We will tell you about other ways you can get help to pay your energy bill, such as:

10.2.1. government relief schemes

10.2.2. energy rebates

10.2.3. concession programs

10.2.4. financial counselling services.

What we need you to do

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

11. Information about government concessions and rebates

11.1. There are a variety of Government concession and rebate schemes that can assist low income, vulnerable or medically dependent customers. For customers in hardship, we can help customers identify concessions or rebates they may be eligible for and help with applications to the appropriate authorities. In some circumstances we can check the CCES (Centrelink Confirmation e-services) to determine a customer's eligibility for some concessions.

11.2. Further information on relevant assistance programs can be found by visiting the following websites:

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

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

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

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

12. Information about financial counselling and advice

12.1. We encourage those customers within our Hardship Program to speak to accredited financial counsellors. This is a free service whereby the financial counsellor works with you to help you take control of your finances. To find a financial counsellor in your area, please phone 1800 007 007 or visit <http://www.financialcounsellingaustralia.org.au>.

12.2. Further, the National Debt Helpline is a not-for-profit service that helps people tackle their debt problems and offer free, independent and confidential advice. Visit <http://www.ndh.org.au/>

13. Further information about Centrepay

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

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

14. Our programs and services

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

What we will do

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

15. We want to check you have the right energy plan

What we will do

- 15.1. When you join our Hardship Program, we will talk to you about your energy use and whether you are on the right plan. If we think there is a better energy plan for you, we will:
 - 15.1.1. explain why the plan is better
 - 15.1.2. ask if you'd like to transfer to the new plan for free.
- 15.2. We will only talk to you about energy plans we can offer.

16. We will work with you

- 16.1. If you have joined our Hardship Program, we will not:
 - 16.1.1. charge late payment fees
 - 16.1.2. require a security deposit
 - 16.1.3. make changes to your plan without your agreement. For example, we will not put you on a shortened collection cycle unless you agree first.

17. We can help you save energy

- 17.1. Using less energy can save you money.

What we will do

- 17.2. When you join our Hardship Program, we can give you tips to use less energy. This can be different depending on the state or territory you live in.

Energy Efficiency

- 17.3. Most customers are unaware of simple things they can do around their home which can reduce energy consumption, thus saving them money.
- 17.4. These websites offer some good advice on energy savings tips to help you understand how your household appliances and energy usage affect your energy bills:
 - 17.4.1. <http://yourenergysavings.gov.au>
 - 17.4.2. <http://www.energyrating.gov.au>
 - 17.4.3. <https://www.choice.com.au>
 - 17.4.4. <https://www.moneysmart.gov.au>

Energy Audits

- 17.5. Please give us a call or email us to find out if you may be eligible for an over the phone or in-home energy audit. We will conduct an initial assessment to determine whether you would benefit from an energy audit, and if so, we can help organise one for you. After our initial assessment we will provide a quote for the in-home energy audit and we'll discuss ways we can help you. You are not required to agree to an in-home energy audit to be accepted into our Hardship Program.

18. What we will do to help you

- 18.1. We recognise the need to ensure that we communicate effectively with customers with different needs including:
- 18.1.1. customers with low English literacy, including customers from culturally and linguistically diverse backgrounds
 - 18.1.2. customers without internet access
 - 18.1.3. customers with disability, and
 - 18.1.4. customers in remote areas.
- 18.2. We will ensure that our customers have support with respect to communicating about the Hardship Policy and Hardship Program including:
- 18.2.1. Referral to language services where available or appropriate;
 - 18.2.2. Communicating in accordance with the customer's preferred method of communication; and
 - 18.2.3. Referral to services that support customers with disabilities.
- 18.3. If you have not indicated a preference for how you wish to receive written communication, we will send any relevant documents to you via post.
- 18.4. We will provide bills and documentation in large print on request by calling us on 1800 57 33 88.
- 18.5. If you need an interpreter, please call the Translating and Interpreting Service (TIS National) on 131 450.
- 18.6. If you are deaf or have a hearing or speech impairment, please call the National Relay Service on 133 677.
- 18.7. If you have any difficulty accessing these services, our staff can help you to do so.

19. Contact us

- 19.1. If you find you are struggling to meet your payment obligations or wish to discuss forms of assistance that may be available to you, please contact us as soon as possible by:
- 19.1.1. Email: hello@floenergy.com.au
 - 19.1.2. Phone: 1800 573 388
- 19.2. If you need an interpreter, please call the Translating and Interpreting Service (TIS National) on 131 450.
- 19.3. If you are deaf or have a hearing or speech impairment, please call the National Relay Service on 133 677.

20. Complaints

- 20.1. Flo Energy Australia Pty Ltd will work with you to resolve any complaints you may have. If you have a complaint, you can contact us by email hello@floenergy.com.au or post at PO Box 448 Flinders Lane Melbourne Victoria, 8009. You can also call 1800 573 388 to leave a complaint.
- 20.2. You can find a copy of our Standard Complaints and Dispute Resolution Procedures on our website www.floenergy.com.au/support/complaints.
- 20.3. What we do when we receive a complaint:
- 20.3.1. Acknowledge any complaint received as soon as possible;
 - 20.3.2. Begin an investigation into the reasons for a complaint;
 - 20.3.3. Keep you updated about the investigation and any proposed resolution;
 - 20.3.4. Notify you as soon as possible of the outcome of our investigation and any proposed resolution.

If you are unhappy with the outcome, you can submit your complaint to the Energy and Water Ombudsman in your state. The ombudsman schemes offer a free complaint resolution service to customers and can be contacted in the following ways:

Queensland

Energy and Water Ombudsman Queensland (EWOQ)

Telephone: 1800 662 837

Website: www.ewoq.com.au

New South Wales

Energy & Water Ombudsman NSW (EWON)

Telephone: 1800 246 545

Website: www.ewon.com.au

Australian Capital Territory

ACT Civil and Administrative Tribunal (ACAT)

Telephone: 02 6207 1740

Website: www.acat.act.gov.au

South Australia

Energy & Water Ombudsman SA (EWOSA)

Telephone: 1800 665 565

Website: www.ewosa.com.au

Tasmania

Energy Ombudsman Tasmania

Telephone: 1800 001 170

Website: <https://www.energyombudsman.tas.gov.au/>

21. Training

- 21.1. Our staff (including any employees, independent contractors, sub-contractors, agents, and other third parties who work with us and deal with our customers) will receive face-to-face and online training in line with our internal policies and as required by the regulations on:
 - 21.1.1. answering customer queries about the customer Hardship Policy and Hardship Program, and
 - 21.1.2. identifying customers experiencing payment difficulties due to hardship, and
 - 21.1.3. assisting customers experiencing payment difficulties due to hardship.
- 21.2. Our training programs will be regularly reviewed and updated in line with regulatory changes, guidance issued by the Australian Energy Regulator and in accordance with good practice. Whenever the Hardship Policy or training materials are updated, staff will receive refresher training to ensure that their knowledge is up to date.
- 21.3. A record of training will be kept for all staff.

22. Privacy

- 22.1. Flo Energy Australia Pty Ltd is committed to respecting the privacy and protecting the personal information of our customers in accordance with the Privacy Act 1988 (Cth) and Australian Privacy Principles. Please visit our Privacy Policy for more information.

23. Review of the policy

- 23.1. This policy will be reviewed at least every two years.

24. Version control

Version	Description	Date
2.0	Customer Hardship Policy updated into new template	14-03-2025
1.0	Customer Hardship Policy updated	03-03-2025
1.0	Customer Hardship Policy created	24-01-2025



Annexure D3 Criterion 1 Declaration - Suitability

Flo Energy
Australia Pty Ltd
ACN 664 209 330

28 March 2025

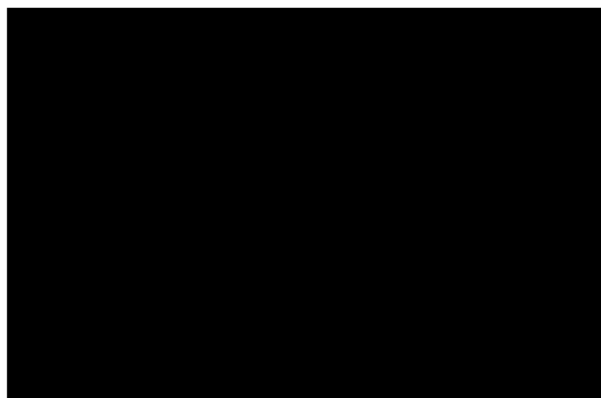
PO Box 448
Flinders Lane Melbourne
Victoria 8009

hello@floenergy.com.au
floenergy.com.au

Operating Hours:
Mon-Fri: 8.30am-5pm
Closed on Sat, Sun & PH

I, Matthijs Jan Guichelaar of [REDACTED] being Director of Flo Energy Australia Pty Ltd, declare that Flo Energy Australia Pty Ltd, Flo Energy Australia Pty Ltd's associates, any other business where, Flo Energy Australia Pty Ltd's officers have held an officer position and any other entity that exerts control over Flo Energy Australia Pty Ltd has not other than disclosed in the application 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 Flo Energy Australia Pty Ltd or an associate of Flo Energy Australia 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.



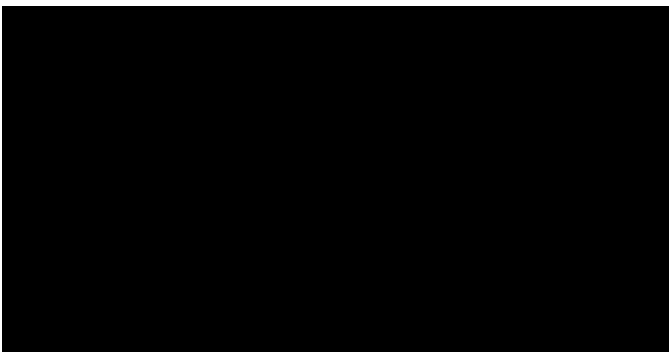
Financial Resources – Criteria 6

6 December 2024

I, Daniel van der Heyden of [REDACTED] being a Chartered Accountant at The Accounting Academy Pty Limited [an independent accountant of Flo Energy Australia Pty Ltd], declare that:

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

Kind regards





Annexure D3 Criterion 1 Declaration - Suitability

**Flo Energy
Australia Pty Ltd**
ACN 664 209 330

PO Box 448
Flinders Lane Melbourne
Victoria 8009

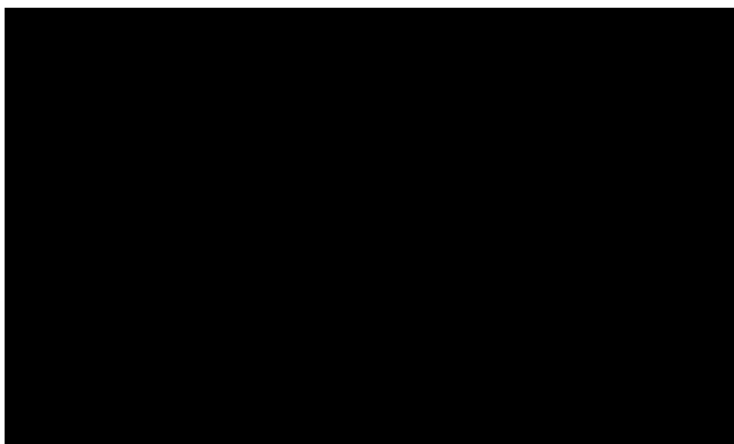
hello@floenergy.com.au
floenergy.com.au

Operating Hours:
Mon-Fri: 8.30am-5pm
Closed on Sat, Sun & PH

28 March 2025

I, Matthijs Jan Guichelaar of [REDACTED] being Director of Flo Energy Australia Pty Ltd, declare that Flo Energy Australia Pty Ltd, Flo Energy Australia Pty Ltd's associates, any other business where, Flo Energy Australia Pty Ltd's officers have held an officer position and any other entity that exerts control over Flo Energy Australia Pty Ltd has not other than disclosed in the application 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 Flo Energy Australia Pty Ltd or an associate of Flo Energy Australia 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.





Annexure D4 Criterion 2 Declaration (Suitability)

Flo Energy
Australia Pty Ltd
ACN 664 209 330

28 March 2025

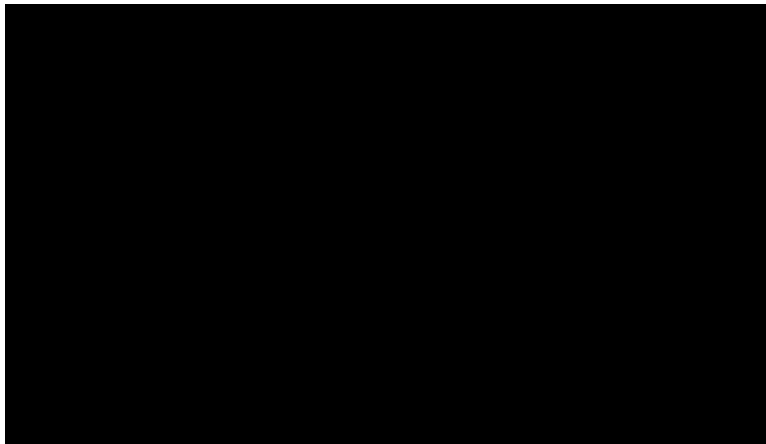
PO Box 448
Flinders Lane Melbourne
Victoria 8009

hello@floenergy.com.au
floenergy.com.au

Operating Hours:
Mon–Fri: 8.30am–5pm
Closed on Sat, Sun & PH

I, Matthijs Jan Guichelaar of [REDACTED] Director of Flo Energy Australia Pty Ltd, declare that Flo Energy Australia's current director/s (or shadow / de facto director/s), and any other person that exerts control Flo Energy Australia Pty Ltd's business activities and all persons who are responsible for significant operating decisions Flo Energy Australia have not committed or been the subject of any offense 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 Flo Energy Australia Pty Ltd's capacity as an energy retailer.

Yours truly,





Flo Energy
Australia Pty Ltd
ACN 664 209 330

PO Box 448
Flinders Lane Melbourne
Victoria 8009

hello@floenergy.com.au
floenergy.com.au

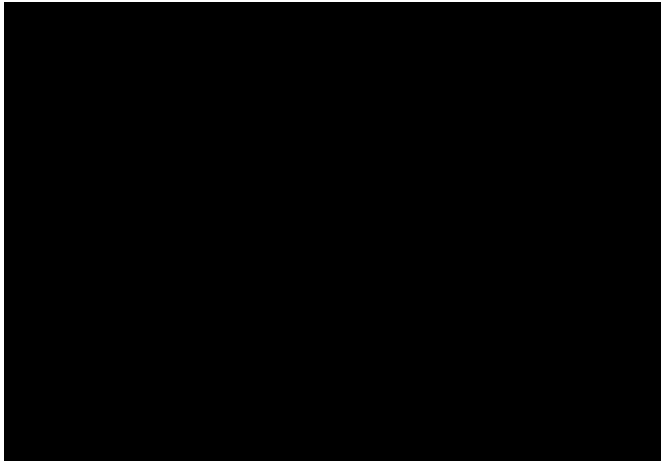
Operating Hours:
Mon–Fri: 8.30am–5pm
Closed on Sat, Sun & PH

Annexure D5: Criterion 4 Declaration (Suitability)

28 March 2025

I, Matthijs Guichelaar of [REDACTED] being
Director of Flo Energy Australia Pty Ltd, declare that:

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



Organisation Structure

