



Energex Annual Ring-fencing Compliance Report

1 January – 31 December 2024

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PURPOSE AND SCOPE

The Australian Energy Regulator (AER) first published its Ring-fencing Guideline – Electricity Distribution (the Guideline) and accompanying Electricity Distribution Ring-fencing Guideline - Explanatory Statement on 3 November 2016 under the National Electricity Rules. On 27 February 2025, the AER released an amended Ring-fencing Guideline – Electricity Distribution (Version 4), with full compliance required by 27 February 2025.

The Guideline is binding on distribution network service providers (DNSPs). It seeks to promote competition in the provision of electricity services, whilst preventing DNSPs from providing an unfair advantage to their related electricity service providers (RESPs) operating in contestable markets.

The Guideline requires Energex Limited (Energex) as a DNSP to prepare an annual ring-fencing compliance report for submission to the AER within four months of the end of each calendar year. In accordance with section 6.2.1(b) of the Guideline, the annual compliance report must identify and describe, in respect of the calendar year to which the report relates:

- the measures Energex has taken to ensure compliance with its obligations under the Guideline;
- any breaches of the Guideline by Energex, or which otherwise relate to Energex;
- all other services provided by Energex in accordance with clause 3.1; and
- the purpose of all transactions between Energex and an affiliated entity.

The annual compliance report must also be accompanied by an assessment of compliance by a suitably qualified independent authority.

This report represents Energex's Annual Ring-fencing Compliance Report covering the period 1 January 2024 to 31 December 2024 (the reporting period). This report is structured to align with the reporting obligations specified in clause 6.2.1(b) of the Guideline.

Energex does not claim confidentiality over this submission or any appendices.

MEASURES TO ENSURE COMPLIANCE

Clause 6.2.1(b)i of the Guideline requires the annual compliance report to identify and describe, in respect of the reporting period, the measures the DNSP has taken to ensure compliance with its ring-fencing obligations.

Activities undertaken during the reporting period focused on enhancing compliance monitoring and reporting processes, with key activities undertaken including:

- Guideline obligations and controls transferred from spreadsheets and deployed in a new Obligation Management Tool (Camms). Planned uplifts for 2025 include automated assurance reminders to control owners.
- Continued transition to management of ring-fencing incidents and enquiries via the enterprise digital services platform. The use of an established platform within the Energy Queensland Group has made it easier for staff to ask questions and raise concerns.
- Enhanced compliance reporting incorporating more frequent and detailed ring-fencing non-compliance data. This increased visibility provides improved insights at a senior management and Board level.

Energex's ring-fencing compliance controls include a mixture of preventative, detective, and corrective controls. A list of the current controls, including a description and the relevant compliance action, is provided in **Appendix 1**.

Breaches of the Guideline

Clause 6.2.1(b)ii of the Guideline requires DNSPs to report any breaches of the Guideline by the DNSP, or which otherwise relate to the DNSP.

During the reporting period, Energex reported six breaches to the AER as outlined in Table 1.

Table 1: Breaches of the Guideline identified during the reporting period

Serial No.	Obligation	Details
1	4.3.2 – Obligation not to disclose ring-fenced information, including to a RESP	On 13 February 2024 a customer's enquiry was forwarded to the incorrect electricity retailer.
2	4.3.2 – Obligation not to disclose ring-fenced information, including to a RESP	On 14 March 2024 a life support notification was sent to the incorrect electricity retailer.
3	4.3.2 – Obligation not to disclose ring-fenced information, including to a RESP	On 23 March 2024 information regarding the appointment of a temporary isolation was sent to the incorrect Metering Provider.
4	4.3.2 – Obligation not to disclose ring-fenced information, including to a RESP	On 7 June 2024 an email was sent to the incorrect Electricity Retailer in relation to a customer-initiated service order.
5	4.3.2 – Obligation not to disclose ring-fenced information, including to a RESP	On 19 October 2024 information regarding the appointment of a temporary isolation was sent to the incorrect Metering Provider.
6	4.3.2 – Obligation not to disclose ring-fenced information, including to a RESP	On 30 October 2024 information regarding the appointment of a temporary isolation was sent to the incorrect Metering Provider.

All breaches were reported to the AER in accordance with clause 6.3 of the Guideline.

Prevention of cross subsidies

Legal Separation

Energex, as a DNSP, is part of the Energy Queensland Group of companies (Energy Queensland Group). Included in the Energy Queensland Group are the following:

- **Energy Queensland Limited** ABN 96 612 535 583 (Energy Queensland) - the parent company which provides administrative, corporate and management functions;
- **Energex Limited** ABN 40 078 849 055 (Energex) - the DNSP operating in south-east Queensland;
- **Ergon Energy Corporation Limited** ABN 50 087 646 062 (trading as Ergon Energy Network) - the DNSP operating in regional Queensland;

- **Ergon Energy Queensland Pty Ltd** ABN 11 121 177 802 (trading as Ergon Energy Retail) – a RESP, providing standard retail contracts to regional Queensland customers; and
- **Yurika Pty Ltd** ABN 19 100 214 131 - a RESP, with two subsidiaries:
 - **Metering Dynamics Pty Ltd** ABN 58 087 082 764 (trading as Yurika Metering) which provides contestable metering services across the National Electricity Market, and
 - **Ergon Energy Telecommunications Pty Ltd** ABN 34 106 459 465 (trading as Yurika Telecoms) which provides telecommunications services but not contestable electricity services.

All companies are separate legal entities registered with the Australian Securities and Investments Commission, each with its own board of directors and ring-fencing compliant constitutions and board charters.

Regarding the stand-alone power systems (SAPS) obligations under the Guideline, Energex did not have any regulated SAPS during the reporting period.

Establish and maintain accounts

Staff follow documented procedures to separate accounts between Energex and its affiliated entities. Energex attributed distribution service costs according to its AER-approved Cost Allocation Methodology (CAM) and conducted monthly reviews for compliance. Energex will submit audited financial data to the AER through the annual Regulatory Information Notice.

Functional separation

Obligation not to discriminate

Energex ensures non-discrimination through staff awareness, tendering and contracting processes, and role separation with access controls.

Ring-fencing training is mandatory for most Energy Queensland Group employees, except roles like remote power station attendants. New staff are automatically enrolled in training via the internal platform, with system reminders sent every fortnight until completion. Managers receive fortnightly reports on training status. Staff can access the training anytime for a refresher, and managers can nominate team members for it.

A ring-fencing reference guide and other resources are accessible on SharePoint. Employees moving to a RESP through transfer or secondment are advised to review the training package before starting their new role.

Offices, staff, branding and promotions

Physical separation/co-location

Staff providing contestable electricity services are primarily located in separate buildings to DNSP staff. Where this is not possible, staff are assigned to a restricted-access areas or a separate floor within a building. Where building security access allows, staff access passes are updated to ensure relevant staff are unable to access offices or areas involved in providing direct control services.

In situations where RESP staff are relocating to an office that houses DNSP staff they are reminded of Energex's ring-fencing obligations. They are specifically asked to:

- Refresh their ring-fencing awareness by undertaking the training package; and
- Check their ID card to ensure it meets the branding and ID Card Guidelines and wear the ID card at all times within the building so they are easily identifiable as RESP staff.

Signage is displayed in prominent locations including lifts and/or foyers to remind staff which building areas they are permitted to access.

Energex has established policies to govern the appropriate use of systems, information, and documents to protect confidential information. These policies include:

- Code of Conduct;
- Use of Systems Policy;
- Information Security Policy; and
- Corporate Document Management Framework.

Staff sharing

The majority of staff are employed by Energy Queensland. Staff are shared across the subsidiaries where permitted to do so under the Guideline. Staff sharing controls include:

- The Staff Sharing reference guide and matrix for any sharing of staff across the Energy Queensland Group to ensure it complies with the staff sharing obligations of the Guideline;
- A staff register which lists the nature of the positions identified, including the roles and duties of the staff, to assist in determining whether a position can be shared with a RESP;
- Human resources and digital processes for staff on-boarding and transfers; and
- Staff training and awareness activities (including a checklist for secondees).

Branding and cross-promotion

In addition to the staff training course, the key branding and cross-promotion controls include:

- Energy Queensland's Brand Guidelines are available to all employees through the internal Brand Centre SharePoint site, which contain brand usage information, logos, templates and accompanying general ring-fencing information (including Email Signature Guidelines) along with reminders and avenues to seek specific ring-fencing advice as required.
- A dedicated internal Ring-fencing Compliance SharePoint site available to all employees, which contains an overview of Energy Queensland's ring-fencing compliance requirements and Frequently Asked Questions.
- A ring-fencing mailbox staff can use to contact the Ring-fencing team, and a General Enquiry Form employees can complete through the 'Service Now' system to report incidents or seek advice from the ring-fencing team about ring-fencing queries. Direction of any ring-fencing related queries received by the Marketing and Brand, Web or Media teams to the Ring-fencing team and reminders throughout the Energy Queensland Brand Guidelines for employees to seek approval through the Corporate Approvals Process

(which includes regulatory review) when intending to use any of the Energy Queensland logos externally and to seek ring-fencing compliance information to check logo usage.

- A Field Uniform internal SharePoint site available to all employees, which contains an overview of instructions about correctly using the relevant branding on uniforms.

Office and staff registers

Energex publishes its office and staff sharing registers on its public websites. Both registers were reviewed and updated in accordance with the requirements in the Guideline.

Current copies of Energex's office and staff registers can be viewed via the following link:
<https://www.energex.com.au/our-network/regulation/ring-fencing>

Information access and disclosure

Energex's breaches of the Guideline during the reporting period pertained to the accidental disclosure of ring-fenced information to a third party. These occurred due to electronic communication being sent to the incorrect third party because of human error. However, the compliance improvements that began in 2023 and continued into this reporting period have helped reduce the volume of breaches by 50%. These improvements included:

- updating and extending the length of induction for new customer service staff members.
- sharing of compliance related learnings as they are identified during the non-compliance reporting process, and
- process improvements including additional verification and escalation options.

Protection of ring-fenced information

To ensure the security of ring-fenced information, automated preventative security access is in place across several platforms. For older, legacy platforms where this is not technically possible, automated reporting cross-checks staff movements against digital access. Periodic manual reviews of staff access to ring-fenced information are also undertaken.

An enterprise digital platform manages digital access processes for applications flagged as containing ring-fenced information. If a RESP staff member requests access to a ring-fenced application, a workflow is triggered which requires the Enterprise Compliance team to review the request before access to the application can be granted.

In addition to the access controls outlined above:

- staff transfer, recruitment and secondment forms include a reminder to consider ring-fencing obligations which includes ensuring staff review their access to applications prior to moving; and
- awareness and guidance materials are available on a dedicated SharePoint site to educate staff on ring-fenced information and the obligation to protect it.

Disclosure and sharing of information

Energex has a documented Information Sharing Protocol and Application Form in place for RESPs and third parties requesting access to ring-fenced information. An information decision tree and FAQs specifically covering information access and disclosure are available to assist staff in determining what information is ring-fenced and under which circumstances it can be shared with RESPs and other third parties. Where employees still have questions or would like tailored training, they are encouraged to seek advice from the various internal subject matter experts.

Energex's Information Sharing Register is kept up to date and records instances where Energex has shared ring-fenced information with a RESP in accordance with its information sharing protocol.

No applications for sharing of ring-fenced information were received during the reporting period.

Energex's Information Sharing Protocol and Application Form is published on its external website and can be viewed via the following link: <https://www.energex.com.au/our-network/regulation/ring-fencing>.

Information register

Energex's Information Sharing Register is published on its external website and can be viewed via the following link: <https://www.energex.com.au/our-network/regulation/ring-fencing>.

WAIVERS

Section 5 of the Guideline allows for a DNSP to seek a waiver of obligations under clauses 3.1, 4.2 and/or 4.4.1(a) if certain conditions are met.

Energex maintains a register of all waivers (including any variations) granted to it by the AER on its external website. The register makes clear the terms and conditions of the waiver, including the specific clause(s) to which the waiver applies.

Energex's waiver register is available for viewing via the following link:
<https://www.energex.com.au/our-network/regulation/ring-fencing>.

Waivers in place during the reporting period are listed below:

- Class waiver from clause 4.2 of the Guideline to allow DNSPs to contract with the Australian Energy Market Operator to provide Reliability and Emergency Reserve Trader services via voltage management;
- Waiver from clause 3.1 to allow Energex to lease part of the capacity of up to thirty-five battery energy storage systems (BESS) to Origin Energy;
- Waiver from clause 3.1 to allow Energex to lease part of the capacity of three BESS; and
- Class waiver from clauses 3.1, 4.2.1 and 4.2.2 to lease part of the capacity of DNSP-led BESS funded under the Australian Government's Community Batteries for Household Solar Program.

COMPLIANCE AND ENFORCEMENT

Clause 6.1 of the Guideline requires a DNSP to establish and maintain appropriate internal procedures to ensure it complies with its obligations under the Guideline.

During the reporting period, Energex continued to operate under the three lines model for risk and compliance, including for the management of ring-fencing compliance. There are several avenues available for staff to ask questions, clarify issues and to report any potential breaches of the Guideline. The majority of enquiries are via the digital platform implemented in 2023 which allows staff members to request ring-fencing advice and clarification prior to undertaking activities; ask questions; request additional training resources; and report incidents or issues. Energex has a Ring-fencing issue notification and assessment process for all ring-fencing related incidents.

ANNUAL REPORTING

Other services provided

Clause 6.2.1(b)iii of the Guideline requires DNSPs to report all other services provided by the DNSP in accordance with clause 3.1 of the Guideline. Specifically, the provision of 'other services' is subject to the granting of ring-fencing obligation waivers by the AER (clause 3.1(d)(vi)).

Energex has provided an 'other service' by leasing part of the capacity of multiple BESS to retail partners during the reporting period.

Transactions with affiliate entities

Section 6.2.1(b)iv requires DNSPs to report the purpose of all transactions between the DNSP and its affiliated entities.

Throughout the reporting period, Energex had a limited number of transactions with affiliated entities. These transactions between affiliated entities are captured in Energex's accounting and finance systems.

Costs are largely captured in our parent entity, Energy Queensland, and charged to Energex and the other entities within the Energy Queensland Group. Costs relating to the program of work (i.e., projects and work orders) are directly charged to projects and recorded in the relevant entity. Other indirect costs and overheads are allocated via the CAM.

Further transaction details are provided in Table 2.

Table 2: Transactions between Energex and affiliated entities

Affiliated Entity	Cost Type	Transaction Description and Purpose
Ergon Energy Network	Materials	Material costs comprise the following direct costs: <ul style="list-style-type: none"> direct acquisitions; goods issued; and other miscellaneous material costs.
Energy Queensland	Network, Non-network and Corporate Overheads	Overheads comprise indirect costs incurred by the Energy Queensland Group. These are charged to Energex in accordance with the CAM and reported as Network, Non-network or Corporate Overhead. These costs consist of:

		<ul style="list-style-type: none"> indirect labour and contractors; office supplies; utilities; audit services; legal services; other professional fees and expenses; licence fees (excluding motor vehicle registration fees) and other ICT operating costs; subscriptions and registrations; telephone, postage and courier service costs; rental costs; insurance (other than motor vehicle and personnel); tools and equipment; and fleet, buildings and property running costs.
Yurika (including Energy and Infrastructure, Assets and Operations, Yurika Telecoms, Yurika Energy Supplies and Yurika Metering)	Various support services provided to/by Yurika	<p>These services include:</p> <ul style="list-style-type: none"> installation/replacement of meters; infrastructure services; operating and maintenance services on generators; design and construction of BESS and solar energy systems; and telecommunication expenses.
Yurika	Network Support Agreement	Availability fees and generator charges may be paid by Energex to Yurika for access to emergency generation where required.

Independent Assessment

Clause 6.2.1(c) of the Guideline requires a DNSP's annual compliance report to be accompanied by an assessment of compliance with the Guideline by a suitably qualified independent authority.

Energex engaged Deloitte to undertake an Independent Assessment of Energex's compliance against the Guideline requirements. The review covered the period from 1 January 2024 to 31 December 2024. Deloitte's report is provided as **Appendix 2** to this Report.

Appendix 1

Compliance Controls

ID	Guideline Clause/Subclause	Control Name & Description	Compliance Actions
1	3.1 Legal separation	<p><i>Legal Separation of DNSPs and RESPs</i></p> <p>DNSPs and RESPs are legally separated entities through company registration and governing artefacts</p>	<ul style="list-style-type: none"> • All EQL Group companies have separate ABNs and are registered with ASIC (P) • Constitutions are ring-fencing compliant (P) • Board Charters are ring-fencing compliant (P) • Board paper templates include means for identifying ring-fenced papers (P) • Executive Governance Framework includes mechanism for Executive General Managers who undertake both regulated and unregulated roles (P) • Group Governance Framework is ring-fencing compliant (P)
2	3.2.1 Separate accounts 3.2.2 Cost allocation and attribution	<p><i>Financial systems configuration</i></p> <p>DNSP's enterprise resource management system captures DNSPs and RESPs and accurately records the entire range of transactions between the affiliated entities, including Procurement; Financial; and HR</p>	<ul style="list-style-type: none"> • Ellipse is configured to meet ring-fencing requirements and capture transactions (P) • Access to Ellipse districts is controlled (P) • System detects potential erroneously coded transactions and flags for review (D) • Annual security review is undertaken by information custodians (D)

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Compliance Controls

ID	Guideline Clause/Subclause	Control Name & Description	Compliance Actions
3	3.2.1 Separate accounts 3.2.2 Cost allocation and attribution	<i>Use and review of Cost Allocation Methodology</i> The Cost Allocation Methodology (CAM) ensures there is an approved process for capturing ring-fencing cost- reflective transactions and allocating costs between DNSPs and RESPs.	<ul style="list-style-type: none"> • CAM continues to incorporate ring-fencing requirements (P) • RINs audits are conducted annually for compliance (D) • Monthly variance analysis is conducted (D) • Monthly reconciliation of budget vs actual is conducted (D)
4	4.1 Obligation not to discriminate	<i>DNSP tender process requirements</i> DNSP tender processes for contestable services consider ring- fencing obligations to ensure RESPs do not receive favourable treatment and DNSP service providers are aware of their ring-fencing obligations.	<ul style="list-style-type: none"> • Tender documents incorporate ring-fencing requirements (P) • Random audits of tenders are undertaken to determine compliance (D)
5	4.1 Obligation not to discriminate 4.2.1 Physical separation / co-location 4.2.2 Staff sharing 4.2.3 Branding and cross-promotion 6.1 Maintain compliance	<i>Ring-fencing awareness course for EQL Staff</i> EQL staff are required to undertake the online ring-fencing awareness course.	<ul style="list-style-type: none"> • Ring-fencing awareness course is assigned to new staff upon starting (P) • Course completion rate is regularly monitored (D) • Additional information and guidance resources are available for staff via the intranet (P)

Appendix 1

Compliance Controls

ID	Guideline Clause/Subclause	Control Name & Description	Compliance Actions
6	4.1 Obligation not to discriminate 4.2.3 Branding and cross-promotion 4.4.1 Conduct of service providers	<i>EQL contracts are ring-fencing compliant</i> EQL terms of contracts include ring-fencing obligations as standard terms.	<ul style="list-style-type: none">• All contract templates are ring-fencing compliant (P)• Ring-fencing obligations are incorporated into new contracts where necessary (P)• Random audits of contracts are undertaken to assess compliance (D)
7	4.2.1 Physical separation / co-location	<i>Physical and accommodation separation of staff</i> DNSP and non-DNSP staff (i.e. RESP and shared services staff) are located in separate offices. Where DNSP and non-DNSP staff are co-located in the same office separation is achieved by locating them on separate floors.	<ul style="list-style-type: none">• Individual office arrangements are based on type of staff accommodated (RESP only, DNSP only, mixed DNSP/RESP, regional location) (P)• Staff are re-located to other offices based on their roles i.e. DNSP, RESP or shared services (P)• Physical signage at offices is ring-fencing compliant (P)• Access to all sites is controlled and monitored electronically (D)• Random staff location audits are undertaken (D)

Appendix 1

Compliance Controls

ID	Guideline Clause/Subclause	Control Name & Description	Compliance Actions
8	4.2.1 Physical separation / co-location 4.2.2 Staff sharing 4.3.1 Protection of ring-fenced information 4.3.3 Sharing of information	<i>System generated staff movement notifications and restrictions</i> HR notifications are sent to Digital to identify start and end dates for staff movements. Access to confidential information is appropriately controlled depending on whether employee is DNSP, RESP or corporate support staff.	<ul style="list-style-type: none"> • Ellipse is automatically updated to recognise staff movements between DNSP and RESP (P) • Automatic notifications are generated for managing Digital and building access (P) • Appropriate Digital accesses are applied to new position (P) • Staff are located appropriate to RESP, DNSP or shared services position (P)
9	4.2.2 Staff sharing	<i>Application of ring-fencing compliant remuneration & performance framework</i> Performance, remuneration and incentives are ring-fencing compliant for staff eligible for bonuses.	<ul style="list-style-type: none"> • Remuneration template is ring-fencing compliant based on staff position (P) • Performance Incentive Framework is ring-fencing compliant (P) • Performance Framework User Guide is ring-fencing compliant and DNSP staff do not have a KPI related to growth in unregulated revenue (P)
10	4.2.3 Branding and cross-promotion	<i>Staff uniform branding is ring-fencing compliant</i> Uniforms for corporate and field staff have ring-fencing compliant branding.	<ul style="list-style-type: none"> • All staff uniforms have ring-fencing compliant branding (P) • Instructions are available to staff on how to correctly use the relevant branding on uniforms (P) • Intranet site is maintained with guidance to staff on how to wear uniforms and FAQs (P)

Appendix 1

Compliance Controls

ID	Guideline Clause/Subclause	Control Name & Description	Compliance Actions
11	4.2.3 Branding and cross-promotion	<i>Application of Brand Guidelines</i> Branding guidelines reflect current ring-fencing advice and are in use by EQL.	<ul style="list-style-type: none">• EQL branding guidelines are available to all employees with accompanying general ring-fencing information and avenues for specific advice (P)• Branding guidelines are easily accessible through EQL Brand Centre on the Intranet site (P)• EQL email signature guidelines are available through on the EQL Brand Centre (P)
12	4.2.3 Branding and cross-promotion	<i>Use and periodic review of corporate templates</i> Corporate documents and templates (i.e. excluding ECM controlled documents) available through the Brand Centre. Brand Guidelines are ring-fencing compliant and provide links for seeking specific ring-fencing advice.	<ul style="list-style-type: none">• Templates are available to all employees through the Brand Centre with accompanying general ring-fencing information and avenues for specific advice (P)• Periodic review of ring-fencing information contained in the Brand Guidelines to ensure ongoing compliance (D)
13	4.2.3 Branding and cross-promotion	<i>Fleet branding protocol</i> Fleet provides the magnets to cover branding as appropriate and responsible for the procurement and provision of same.	<ul style="list-style-type: none">• Fleet branding for DNSPs or RESPs fleet follow approved ring-fencing Branding Guidelines (P)• White magnetic stickers are placed over DNSP logos on vehicles prior to undertaking unregulated works (P)

Appendix 1

Compliance Controls

ID	Guideline Clause/Subclause	Control Name & Description	Compliance Actions
14	4.2.4 Office and staff registers 4.3.4 Information Register 4.3 Information access and disclosure 5.7 Waiver register	<i>Maintenance of ring-fencing registers (Waiver, Office, Staff, Information)</i> DNSPs current staff sharing, office sharing, information sharing and waiver Sharing registers are publicly available.	<ul style="list-style-type: none"> Registers reviewed quarterly in Jan, Apr, Jul & Oct and updated, if required (P) Current registers are published on the DNSP websites (P)
15	4.3.1 Protection of ring-fenced information 4.3.2 Disclosure of information 4.3.3 Sharing of information	<i>Use of information sharing protocol</i> Information sharing protocol and supporting decision tree are available and utilised	<ul style="list-style-type: none"> Information sharing protocol maintained and easily accessible via the intranet (P) Information sharing protocol available on the external website (P) Information sharing decision tree maintained and easily accessible via the intranet (P)
16	4.3.1 Protection of ring-fenced information 4.3.2 Disclosure of information 4.3.3 Sharing of information 6.1 Maintain compliance	<i>System access controls for shared staff</i> System access controls are in place for customer service and dispatch staff to allow them to perform regulated and unregulated work in compliance with the Ring-fencing Guideline.	<ul style="list-style-type: none"> Call centre processes incorporate ring-fencing obligations (P) Shared staff have dual profiles to control access to information dependent on their current function (P)

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Compliance Controls

ID	Guideline Clause/Subclause	Control Name & Description	Compliance Actions
17	4.3.1 Protection of ring-fenced information 4.3.3 Sharing of information	<i>Digital system access reviews</i> ICT security access procedures incorporate ring-fencing obligations including access provided based on DNSP or RESP approved programs	<ul style="list-style-type: none">Use of Systems (UoS) agreement includes ring-fencing requirements. All staff agree to the UoS every time they log-in to the system (P)Digital teams have ring-fencing lists for determining access requests based on DNSP or RESP approved lists (P)All RESP requests to access to sources of ring-fenced information are reviewed by the Risk & Compliance Team prior to approval (P)
18	4.3.1 Protection of ring-fenced information 4.3.2 Disclosure of information 4.3.3 Sharing of information	<i>Digital ring-fencing audit</i> Periodic testing is performed to determine whether any RESPs staff have access to DNSPs ring-fenced information. Exceptions are investigated for potential breaches and remediation	<ul style="list-style-type: none">RESPs staff list is checked against known Digital sources of ring-fenced information (D)Remediation areas are identified and rectification activities commenced if required (C)

Appendix 1

Compliance Controls

ID	Guideline Clause/Subclause	Control Name & Description	Compliance Actions
19	6.1 Maintain compliance	<p><i>Ring-fencing compliance management process in place</i></p> <p>Compliance Management Policy incorporates Ring-fencing obligations.</p> <p>An online ring-fencing awareness course is available for staff.</p> <p>Additional ring-fencing awareness resources are available to staff via the intranet.</p>	<ul style="list-style-type: none">Confidential Information Policy includes ring-fencing obligations (P)Compliance Management Policy incorporates Ring-fencing obligations (P)New starters complete the online ring-fencing awareness course in a timely manner (P)Existing staff retake the online ring-fencing awareness course if identified as high risk e.g. shared staff (P)An informative ring-fencing SharePoint site is maintained with relevant awareness and guidance materials e.g. decision trees, ring-fencing checklists, FAQs, information sharing protocol and issue notification process (P)A dedicated mailbox is available for staff to request advice on ring-fencing (P)A ServiceNow form is available to report incidents or request advice (P)

Appendix 1

Compliance Controls

ID	Guideline Clause/Subclause	Control Name & Description	Compliance Actions
20	6.2.1 Annual compliance report 6.2.2 Timing of annual compliance reporting	<p><i>Annual compliance report to the AER</i></p> <p>Annual ring-fencing compliance report is prepared for each calendar year.</p> <p>Annual compliance assessment is undertaken by a qualified independent auditor.</p> <p>Annual compliance report and independent auditor's assessment report are submitted to the AER in a timely manner.</p>	<ul style="list-style-type: none"> Annual ring-fencing compliance report contains relevant content (D) Engagement of an appropriately qualified external auditor for compliance assessment (D) Timely submission of annual compliance report and independent compliance assessment report to the AER (D)
21	6.3 Compliance breaches	<p><i>Ring-fencing breach identification and reporting to the AER</i></p> <p>Ring-fencing issue notification, assessment and breach reporting protocol and supporting template is maintained and easily accessible to reported to the AER using the correct template.</p> <p>Causes of ring-fencing breaches are identified and rectified.</p>	<ul style="list-style-type: none"> Notification of ring-fencing issues to Risk & Compliance upon identification (D) Risk & Compliance assess the reported issues to determine if a ring-fencing breach has occurred (D) Appropriate corrective actions are taken to address the cause(s) and prevent recurrence (C) All breaches are reported to the AER using the correct template within specified timeframe (D) A Ring-fencing Breach Register is maintained (D)

(C) Corrective, (D) Detective, (P) Preventative