



General Manager
Retail Markets Branch
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

Electricity Retail Authorisation Application – 2026

Please find attached our application for authorisation to be an electricity retailer within the national electricity market (NEM). An electronic version of this application has been forwarded to AERauthorisations@aer.gov.au.

Please do not hesitate to give me a call if there are any aspects of our application that requires clarification.

Yours sincerely



Song (Jason) Huang
Director
GGP Energy Pty Ltd

1 Introduction

GGP Energy Pty Ltd, trading as GGP Energy is a company that specialises in designing and installing ground-mounted solar and battery farms. To date it has completed the build of 2 solar and battery farms in South Australia.

The intent is to organically grow the retail business off the back of these small scale renewable solar and battery assets that are being deployed by retailing to a handful of small C&I and SME businesses in South Australia.



GGP has already identified a handful of business customers it can retail to instead of only generating energy straight to the grid. GGP intends to only retail to enough customers to make its generation portfolio so that it is not exposed to grid and spot risk that it is currently exposed to.

2 General Particulars

2.1 Legal name of applicant

GGP Energy Pty Ltd

2.2 Trading name

GGP Energy Pty Ltd

2.3 Australian business number

ACN: 619 158 191

ABN: 14 619 158 191

Appendix A – ASIC certificate

2.4 Registered business address

[REDACTED]

2.5 Nominated contact person

Song (Jason) Huang, CEO and Director – GGP Energy Pty Ltd

Email: [REDACTED]

2.6 Retailer authorisation sought

Electricity

2.7 Intended date of retail commencement

GGP Energy intends to commence offering retail services to customers after obtaining the retailer authorisation from the AER.

2.8 Nature and scope of operations

GGP Energy's retail strategy is aimed at reducing as far as practicable the exposure that GGP Energy would have to the NEM spot market and providing a stable return. GGP Energy is only looking to provide retailing products to customers equivalent to its predefined exposure base and limits. The customers. Load generated from its assets beyond its customer coverage will continue to be remunerated at grid prices as have 100% of its assets been to date.

GGP Energy has now built a history of building small scale generation facilities (sub 5MW solar and battery systems) and intends to utilise this as a platform to also offer retail services to customers that are part of its generation solution.



2.9 Jurisdictions for retailing of electricity

GGP Energy is initially focusing on the SA region as it builds out its small-scale generation facilities over the following 3 years. The medium to longer term however is to have customers in other NEM regions.

2.10 Customer type

All customer classes

3 Required Information – Organisational and Technical Capacity

3.1 Previous experience as a retailer

GGP Energy does not have any previous experience as an electricity retailer. GGP Energy has engaged specialist retail expertise at scale to assist with its relatively small retailing requirements. The medium term and longer-term objectives are for GGP Energy to upskill other existing staff within GGP as it grows and spreads its IP base.

As a result, GGP Energy will be looking to operate as a retailer for the purpose of meeting its generation capacity and exposure only.

3.2 Details of any other relevant experience

Refer to Appendix B and C (confidential) for further information regarding the structure and key individuals and firms that have been brought together to support GGP's retailer.

3.3 Where no previous energy market experience, how you intend to bring this experience into your business

GGP Energy has appointed key individuals to assist it with its compliance obligations management and its additional retail operational requirements. This will ensure that GGP has internal control over all its major procedures, systems and compliance obligations. Key CV's and staff information have been provided Appendix B – External Resource Adequacy (confidential).

GGP Energy will deepen its current staffing retail experience through these appointments and to spread its IP risk and ensure it has the capability to undertake the retail tasks internally.

3.4 Organisation chart showing structure of organisation

Please refer to Appendix C – Organisation Chart and Qualifications 

3.5 Total number of employees, broken down by business unit or relevant classification

As noted in the organisational chart for GGP Energy, there are dedicated resources that will be allocated to the energy retail business including the roles of CEO, Customer Operations and Billing Manager, Compliance Manager and Finance Manager.

Please refer to Appendix B and C for further information on staffing and third-party capability and organisational structure.



3.6 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

Please refer to Appendix B – (confidential).

3.7 Third party agreements

Please refer to Appendix B and C – (confidential). GGP Energy has pivoted to ensure that while its forecasted number of customers is small, that it has the appropriate experience internally as well as the assistance of key third parties. GGP Energy also has a strong accounting and financial services group that will be utilised for account management, billing, and settlements. GGP has been running its generation assets for some time now which illustrates settlement and billing capacity in house.

GGP Energy where noted will engage external resources as noted in Appendix B and will contract with these parties once it has in principle retail authorisation from the AER. In the meantime, it will ensure that it has the internal capability to retail without his support.

3.8 Business Plan, including but not limited to strategic direction and objectives, forecast results and detailed assumptions on how results were calculated

Refer to Appendix D – (confidential).

3.9 Compliance strategy

Refer to Appendix E, E1, E2 that also cover key compliance support documents around breach management and training.

3.10 Copy of risk management strategy covering both operational and financial risks

Refer to Appendix F1, F2 and F3 for Risk Strategy, Risk assessment, Energy Risk Register and Trading Policy document– (confidential).

3.11 Evidence that risk management and compliance strategies have been subject to an external assurance process (external audit)

Please see a copy of our audit letter by referring to Appendix G and G1 for a copy of Finlayson's capability statement.

3.12 Any additional information which demonstrates ability to manage risk and operate in accordance with the Retail Law objective, particularly the long-term interests of consumers (e.g., copies of any retail contracts that you have developed)

Refer to Appendix F for a copy of our Complaints Policy.

Refer to Appendix I – (confidential).



3.13 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

GGP is intends to participate in relevant Energy Industry Ombudsman Schemes, and registration with the Australian Energy Market Operator as a customer.

These will be applied for once the AER has effectively endorsed our application for a retailer authorisation. Evidence of reaching out to the SA Ombudsman has been provided as Appendix J.

3.14 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.

GGP intends to make applications to AEMO and have appropriate arrangements in place with distribution network operators. For evidence that GGP has started its applications for key players such as AEMO or the networks please refer to Appendix J (confidential). Please note GGP has decided not to work with a Billing CRM provider. Due to the small amount of customers, it has forecasted to retail to it has appointed proven retail experienced resource to manage the billing process manually. This will allow GGP to maintain control of its data right across its meter to cash process.

4 Required Information – Financial Resources

4.1 Details and evidence of your current financial position (interim financial accounts and bank statements)

GGP Energy has provided bank statements and financial accounts as per the confidential appendix to this application.

Please refer to Appendix H and I – Confidential.

4.2 Group ownership information

Please refer to Appendix C.

4.3 Written declaration from CFO, CEO or director stating you are going concern, and you are unaware of any factor that would impede your ability to finance your energy retailing activities or retailer's authorisation for next 12 months

Please refer to Appendix K.

4.4 A written declaration from an independent auditor or your principal financial institution stating that:

- An insolvency official has not been appointed in respect of the business or any property of the business



- 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
- They are unaware of any other factor that would impede your ability to finance your energy retail activities under the authorisation

Please refer to Appendix L.

4.5 Details of any bank guarantees or arrangements or process to access additional capital

GGP Energy does not currently have any bank guarantees or arrangements in place for additional capital.

4.6 Forecast revenue and expenses to the point where your business is cash flow positive.

The forecast should be consistent with your business plan and highlight all key assumptions and risks.

Please refer to revenue forecast provided with the business plan – Appendix D (confidential).

5 Required Information – Suitability

5.1 Details of 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 administration undertakings) being taken by a regulatory body.

GGP Energy Pty Ltd has not had any material failure to comply with regulatory requirements over the previous 10 years.

Refer to Appendix M.

5.2 Details of any previously revoked authorisations, authorities or licences held in any industry and the reason/s for the revocation

GGP Energy Pty Ltd has not had any authorisation, authorities or licences revoked.

5.3 Details of any failed authorisation, authority or licence applications in any industry and the reason/s the application was unsuccessful

GGP Energy Pty Ltd has not had any failed authorisations or licence applications.

5.4 Details of any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry

GGP Energy Pty Ltd has not had any past or present legal action relating to an authorisation, authority or licence in any industry.

5.5 Details of any situation/s where you (or an associate) have previously triggered the RoLR provisions or 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

None

5.6 Details of any offences or successful prosecutions under any territory, state, Commonwealth or foreign legislation

Please refer to Appendix N.

5.7 Written declarations from CFO or CEO:

- That members of your management team have not been disqualified from the management of corporations;
- About the record of bankruptcy of your management team (including in any overseas jurisdiction)

Please refer to Appendix O.

5.8 Full names and current residential addresses of all your officers

See Appendix P for declaration provided.

5.9 Details of policies and procedures addressing the probity and competence of officers and any other key management staff

GGP Energy is a new company and has no direct retail experience. It has however developed policies with regards to the probity and competence it expects of its officers and staff. Refer to Appendix Q Confidential.

5.10 Any additional information that will assist us in our consideration of the character and past performance of your officers

None at this point. We will make further information available to the AER on request. [5.11](#)

Loan Facilities

Nil

5.12 Financial 5 Year Forecast

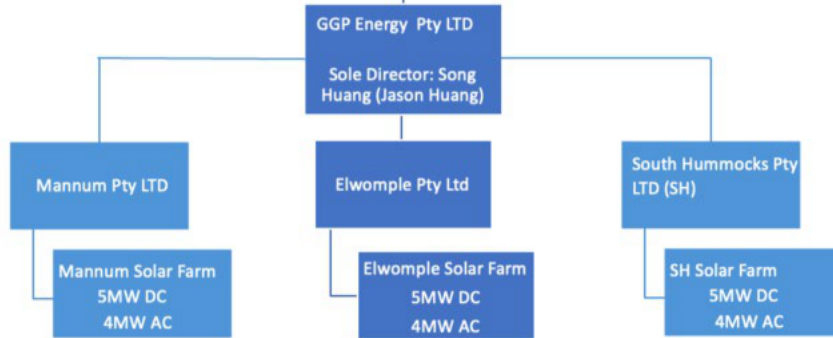
Please refer to information in Appendix D – Retail Strategy (Business Plan) and Associated Excel Model. (Confidential)



Appendix (All documents Commercial in confidence unless otherwise noted below)

- Appendix A – Company registration certificate (with name change confirmed)
- Appendix B – CV and third-party information
- Appendix C – Organisational Chart/Corporate Chart - Public
- Appendix C1 – Function Checklist
- Appendix D – Business Plan
- Appendix E – Compliance Strategy - Public
- Appendix E1 - Breach documentation
- Appendix E2 - Training Plan
- Appendix F – Complaints Policy - Public
- Appendix F1 - Risk Strategy
- Appendix F2 – Risk Assessment
- Appendix F3 – Energy Risk Register, Trading Risk Policy
- Appendix G – Compliance Audit Letter - Public
- Appendix G1 – Finlayson’s Cap statement
- Appendix H – Bank Statements
- Appendix I – Financial accounts
- Appendix J – Third party progress evidence
- Appendix K – Going Concern declaration - Public
- Appendix L – Accountant declaration - Public
- Appendix M – Material failure declaration - Public
- Appendix N – No Offences declaration - Public
- Appendix O – Disqualification/bankruptcy declarations - Public
- Appendix P – Address declaration
- Appendix Q – Probity documents

APPENDIX C – ORGANISATION CHART and QUALIFICATIONS



Key individual information

Jason Huang

Jason has managed GGP over the last 4 years and overseen the delivery of all key generation projects. Jason is experienced with wholesale settlement, forecasting and load management. Has been the strategic driver in wanting to sell GGP's generation to a handful of customers as opposed to the grid directly. Jason sits on the SAPN Advisory board and was previously a founder of C&J Accountants and Advisors firm which started in 2012 and continues its operations today. Jason has his MBA from the University of Adelaide and is a Graduate Member of the Australian Institute of Company of Directors.

Tamia Yan

Tamia is an Experienced Financial Manager with over 10 years of accounting experience. Tamia has a CPA and has worked with GGP over the last year to manage GGP Energy's retail finance tasks which include - Renewable certificate management, AEMO settlements, review of wholesale data and exposures, reconciliation of mandatory payments and data as well as the business operating model.

Leo Zhang

Leo has been running the invoicing and AEMO settlement process since GGP first delivered its generation capacity to the market. Leo has undertaken retail pricing analysis and manages the relationships with key counter parties including networks, EPCs, and LGC agents as well as electricity retailers. Leo has built up considerable experience in managing GGP's current position. Leo has a Bachelor of Commerce as well as a Masters of Applied Finance from the University of Adelaide.

Brett Harman

An accomplished accountant specialising in energy finance and operations, Brett has worked in corporate and small business environments for over 15 years, including being the co-founder of a successful start-up energy retailer in the Australian energy market as well as the Irish energy market. Brett possesses deep expertise in electricity retail, embedded networks, distribution networks and industry regulations, and brings an entrepreneurial spirit to developing strategies, solutions and financial models for clients.

Jackson John

Jackson has worked in the energy industry over for the last 13 years and worked with a number of Energy retailers. Firstly, as a General Manager of Compliance - Operations for Online Power and Gas (2015–

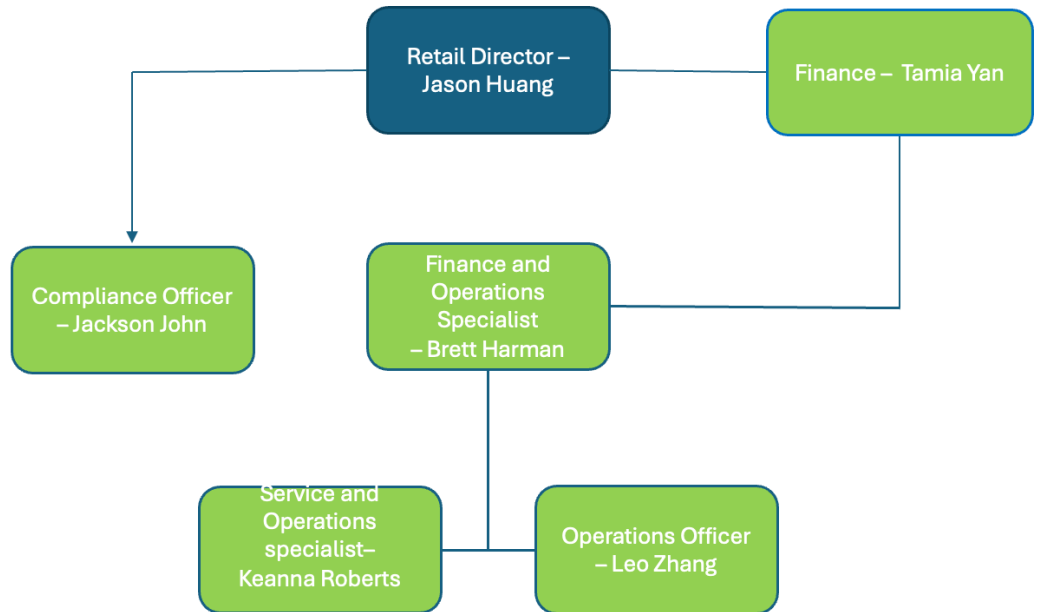


2018) and then as a Compliance Officer for Glowpower Pty Ltd (2018-2019). Since 2019, Jackson has established his own energy retail consultancy— Judeico working with retail energy clients and supporting them with Compliance and operational instruction.



GGP Energy Pty Ltd – Organisational Chart

Day 1 operations team Retail Entity





GGP Energy

Compliance Policy – September 2024

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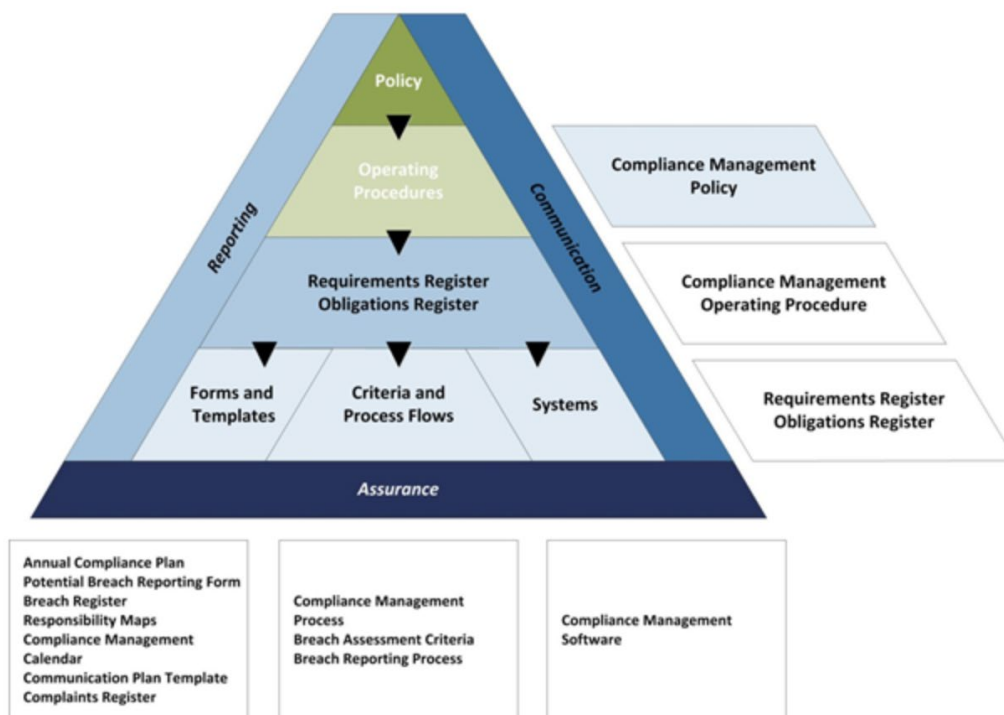
1. Policy Statement

GGP Energy understands the critical role of compliance within the business and especially within a retail energy business. GGP Energy knows that it must operate within industry laws, rules, regulations and guidelines. GGP Energy is committed to creating and promoting a strong culture of compliance and ethical behaviour that will ensure that its compliance obligations are met.

The purpose of this policy is to set out GGP Energy’s compliance objectives, assign appropriate responsibilities to ensure compliance obligations are met across the organisation and outline some important tools that will be utilised to manage those obligations. This Policy will be made available to all staff and, at GGP Energy’s discretion, to relevant interested third parties.

2. GGP Energy’s approach to compliance

GGP Energy has identified compliance management as not only a key ingredient of good corporate governance, but as key to GGP Energy’s responsibility to the energy industry and wider community. This Policy outlines some of the monitoring programs and tools that are required to ensure GGP Energy has sound practices when retailing energy. GGP Energy’s Compliance Management System is consistent with and illustrated by the diagram shown below.



Continuous Improvement of Compliance Management System

GGP is committed to improving its Compliance Management System to achieve its compliance management objectives as set out in clause 5 of this Policy.

Reporting

GGP encourages all staff to report compliance related complaints, breaches, incidents and issues.

Training

GGP will supply all staff with training on a regular basis to provide staff with the necessary competencies to understand their compliance obligations and perform their roles effectively.

The training GGP provides shall be reviewed regularly to assess its effectiveness.

3. Scope

This Policy and its objectives apply to and must be adhered to by the Executive Team, the Executive Team, Compliance Committee, operational staff, volunteers and contractors of GGP Energy. GGP Energy will not tolerate any deliberate, negligent or reckless breach of compliance, or unethical behaviour by any of its staff or contractors. Any such actions may result in disciplinary action or termination of engagement or employment.

4. GGP Energy's Compliance Context

GGP Energy is a renewable energy company specialising in investing, designing and constructing solar and battery farms, solar roofs and microgrids for property owners, businesses and communities. It also will operate a retail business subject to the NECF and other retail energy rules and obligations to ensure that it protects the integrity of the deregulated industry and ensures that customers it engages with are given the minimum protections available to them.

As a start-up energy retailer, GGP Energy operates in a highly regulated environment. Within this environment GGP Energy as an authorised retailer, will be subject to many compliance obligations including, but not limited to:

- laws and regulations;
- license or authorisation requirements of the Australian Energy Regulator (AER);
- relevant codes and guidelines as administered by regulatory bodies such as the AER;
- guidelines and rules of key industry bodies such as the Energy & Water Ombudsman, Market administrators (such as AEMO), and Distribution Networks;
- judgments of courts and administrative tribunals;

- obligations arising from contractual arrangements with third parties; and
- the policies and procedures set by GGP Energy.

Non-adherence to the obligations stated above can result in industry audits, undertakings, fines, penalties, reputational damage and even the suspension or revocation of energy authorisations. Non-adherence may further result in individual penalties for GGP's officers.

5. Compliance Management Objectives

GGP Energy has identified the following as key objectives regarding effective compliance management:

- Ensuring compliance management thinking and processes are integrated into business strategy, all operational processes, all projects and areas where key decisions are being made.
- Providing appropriate training and education to ensure that all staff can perform their daily functions in a manner that meets compliance obligations or can identify when a potential breach may occur.
- Ensuring transparency and reporting exists across all processes to allow for identification and management of potential compliance breaches. This includes accurate monitoring, review and communication to all levels of staff.
- Ensuring that there is continual review and improvement of GGP Energy's Compliance Policy and processes.
- Promoting accountability as well as confidence in performance and decision making around compliance obligations.
- Representing the organisation, internally and to external partners, with confidence and demonstrate an understanding of sound business practice and approach to compliance management.
- Ensuring controls are put in place that:
 - Are designed to effectively manage compliance obligations of the organisation;
 - That meet the requirements and standards of all relevant third parties including key industry and regulatory bodies; and
 - Provide a culture of quality assurance and confidence to all staff and external contractors.
- Enabling the appropriate resourcing is available with regards to ensuring the organisation's compliance obligations are managed.

6. Roles and responsibilities

Executive Team

The GGP Energy Executive Team is ultimately responsible for approving the Compliance Policy, and oversees the adherence, monitoring and review of the organisation's Compliance Policy. The Executive Team is also responsible for reviewing and making recommendations to the executive staff regarding the Compliance Policy.

The Executive Team is responsible for leading a compliance culture across the organisation through promoting and supporting the Compliance Policy.

The Executive Team are responsible for ensuring that appropriate resources, systems and processes are in place to implement the Compliance Policy across the organisation, comply with legislative and regulatory requirements within their specific areas of operational responsibility, and ensure that any potential or actual legislative non-compliance has been identified and is being managed appropriately. Specifically:

- remaining aware of the compliance obligations (including monitoring for changes in legislation and regulation);
- supporting the reporting of non-compliance or potential non-compliance to any relevant regulator or required third party;
- supporting the undertaking of corrective actions to compliance breaches in a timely manner; and
- encouraging behaviours that create and support compliance and a compliance culture, including by encouraging staff to report compliance related complaints, breaches, incidents and issues without fear of retaliation.

Compliance Committee

GGP Energy has set up a Compliance committee to ensure that:

- recommendations for approvals to the Executive Team can be made regarding the Compliance Policy and process;
- audits (internal and external) of business processes are given a priority focus;
- the effectiveness of GGP Energy's compliance policies and processes are always monitored and developed; and
- compliance processes and controls are being implemented, tested, reviewed and improved.

Compliance Officer

The Compliance Officer will work closely with the Executive staff and will have day to day responsibility for administering the Compliance Policy as well as:

- providing guidance and support to all employees;
- managing the Compliance Calendar, monitoring legislation, regulations and codes for any changes or new statutory requirements;
- reporting non-compliance issues, whether systemic, recurring or one-off;
- ensuring that legislative and regulatory requirements are met within their areas;
- ensuring that the compliance requirements for relevant staff's areas are identified, understood and documented (in registers, documentation and reports);
- monitoring identified legislation and regulations for change and ensuring that compliance continues to be maintained, including providing advice to the Executive staff if such change impacts the business processes or current Compliance Policy;
- providing guidance and support to staff on compliance with regulatory obligations (including new or changed obligations) relevant to their areas of responsibility;
- monitoring, auditing and reporting (through the activities already outlined) non-compliance; and
- encouraging behaviours that create and support compliance and a compliance culture, including by encouraging staff to report compliance related complaints, breaches, incidents and issues without fear of retaliation.

Managers and staff

Commitment must be demonstrated by all managers and staff by making themselves fully aware of the organisation's regulatory obligations within their area of accountability or span of control. All managers and staff are responsible for:

- adherence to the compliance obligations relevant to their position;
- performing their duties in a lawful and safe manner;
- undertaking training as required on compliance activities and initiatives;
- undertaking corrective actions to compliance breaches in a timely manner; and
- reporting and escalating compliance concerns, issues, complaints and failures in accordance with procedures connected with this Policy.

7. Compliance Commitments

In addition to meeting the objectives as laid out in this policy, GGP Energy is committed to the development, implementation, monitoring and ongoing review of its Compliance Management System.

The guidance provided by AS/ISO 37301: 2023 Compliance management systems – Requirements with guidance for use has been incorporated in the design of the system and associated policies and processes.

The following illustrates this and outlines some of the tools GGP Energy is committed to implementing:

- **Monitoring and auditing.** GGP Energy acknowledges that sound compliance management practices should always identify actual or potential breaches. Each area of the business is accountable for management of relevant compliance obligations. GGP’s Executive Team may monitor and periodically audit its Compliance Management System in order to ensure the compliance objectives are achieved and to assess whether it has been implemented effectively;
- **A Comprehensive Compliance System** – This System sets out specific roles and responsibilities as well as the administrative detail around some (but not all) of the following activities –
 - Maintenance of a Compliance Calendar
 - Maintenance of a Key Compliance Obligations register
 - Maintenance of the company Breach register
 - Breach reporting process
 - Any other internal or external reporting process regarding Compliance activities
 - Responsibility Maps
 - Review of Quality Assurance process;
- **Sound Communication with external Parties.** GGP Energy will always seek to maintain cooperative relationships with regulators and other key industry bodies. These relationships will always be managed by designated compliance staff;
- **A Dispute Resolution Policy.** All GGP Energy staff will be required to be trained in the organisation’s Dispute resolution policy. GGP Energy’s desire is to manage and remediate all disputes and breaches in line with its policies and in line with any regulatory obligation;
- **Required Resourcing and Training.** In order to ensure fulfillment of its compliance obligations GGP Energy understands that it will need to ensure appropriate resourcing is put in place with a focus on this policy and compliance management processes. GGP Energy is committed to training all its staff accordingly and ensuring all round staff competence when it comes to managing compliance obligations within their specific areas;
- **Ongoing review of this Policy.** As a part of its commitment to compliance, in addition to internal review, GGP Energy will have its policy externally reviewed once every 2 years to ensure it is relevant and up to date in managing GGP Energy’s compliance obligations. Any changes to this policy will require Executive Team approval.

8. Related Policies and documents

This Policy is supported by the following GGP policies as amended from time to time:

Risk Management Policy

Code of conduct

GGP Energy Risk Assessment tool

GGP Energy Risk Register

Health and Safety Policy

Trading risk Policy

Legislative References

AS/ISO 37301:2023 Compliance Management Systems – Requirements with Guidance for Use

Date of Issue:

Reviewed by: _____ **Date:**

Approved by: _____
(Director)

Date of next review:



GGP Energy Complaint and Dispute Resolution Policy

GGP Energy Pty Ltd

ABN 14 619 158 191

1. Introduction

The Energy Retail Code (ERC) states “A retailer must handle a complaint by a customer in accordance with the relevant Australian Standards on complaints handling.” The relevant current Australian Standard and is AS 10002: 2022 Guidelines for complaint management in organizations. This policy is aligned with those guidelines.

1.1 Purpose

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

Our complaint management system is intended to:

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

This policy provides guidance to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system. A copy of this policy can be found at <https://ggpenergy.com.au/>.

To make a complaint, please contact GGP Energy at:

- 08 8546 3527
- info@ggpenergy.com.au
- 268 Glen Osmond Road, Fullarton, SA 5063

1.2 Scope

This policy applies to all staff receiving or managing complaints from customers regarding our products and services.

1.3 Commitment



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

Who	Commitment	How
CEO/Director of GGP Energy	Promote a culture that values complaints and their effective resolution	<ul style="list-style-type: none"> • Report publicly on GGP Energy’s complaint handling. • Provide adequate support and direction to key staff responsible for handling complaints. • Regularly review reports about complaint trends and issues arising from complaints. • Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Encourage staff to make recommendations for system improvements. • Recognise and reward good complaint handling by staff. • Support recommendations for product, service, staff, and complaint handling improvements arising from the analysis of complaint data.
Manager responsible for complaint handling	Establish and manage our complaint management system	<ul style="list-style-type: none"> • Provide regular reports to the Head of Operations on issues arising from complaint handling work. • Ensure recommendations arising out of complaint data analysis are canvassed with Head of Operations and implemented where appropriate.



Who

Commitment

How

Staff whose duties include complaint handling

- Recruit, train and empower staff to resolve complaints promptly and in accordance with GGP Energy's policies and procedures.
- Encourage staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system.
- Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.
- Recognise and reward good complaint handling by staff.
- Treat all people with respect, including people who make complaints.
- Assist people make a complaint, if needed.
- Comply with this policy and its associated procedures.
- Keep informed about best practice in complaint handling.
- Provide feedback to management on issues arising from complaints.
- Provide suggestions to management on ways to improve the organisation's complaints management system.
- Implement changes arising from individual complaints and from the



Who	Commitment	How
All staff	Understand and comply with GGP Energy's complaint handling practices	<p>analysis of complaint data as directed by management.</p> <ul style="list-style-type: none">• Treat all people with respect, including people who make complaints.• Be aware of GGP Energy's complaint handling policies and procedures.• Assist people who wish to make complaints access GGP Energy's complaints process.• Be alert to complaints and assist staff handling complaints resolve matters promptly.• Provide feedback to management on issues arising from complaints.• Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.

2. Terms and Definitions

Complaint

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

Complaint management system

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

Policy

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



Procedure

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

3. Guiding principles



3.1 Facilitate complaints

People focus

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

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

People making complaints will be:

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

No detriment to people making complaints

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

Anonymous complaints

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

Accessibility



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

We will also provide customers with information on their right to contact the relevant ombudsman in their respective state at any time for independent advice and information, as well as go to that ombudsman if they are dissatisfied with our handling of their complaint or dispute. We will provide ombudsman contact details on our website.

No charge

Complaining to us is free.

3.2 Respond to complaints

First call resolution

Where possible, complaints will be resolved at first contact with GGP Energy.

Responsiveness

We will promptly acknowledge receipt of complaints, and in any event will use reasonable endeavours to acknowledge receipt of a complaint within three business days of receiving it.

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

We will advise a complainant as soon as possible should we discover a complainant's complaint, or part thereof, is unable to be dealt with by us.

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

- the complaints process;
- the expected time frames for our actions;
- the progress of the complaint and reasons for any delay;
- their likely involvement in the process; and
- the possible or likely outcome of their complaint.

Objectivity and fairness



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

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

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

Responding flexibly

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

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

Confidentiality

We will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by GGP Energy as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

3.3 Manage the parties to a complaint

Complaints involving multiple organisations

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

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

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



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

Complaints involving multiple parties

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

Empowerment of staff

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

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

Managing unreasonable conduct by people making complaints

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

- our ability to do our work and perform our functions in the most effective and efficient way possible;
- the health, safety, and security of our staff; and
- our ability to allocate our resources fairly across all the complaints we receive.

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

4. Complaint management system

4.1 Introduction

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

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



The five key stages in our complaint management system are set out below in 4.2 to 4.6.

4.2 Receipt of complaints

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

The record of the complaint will document:

- the contact information of the person making a complaint;
- issues raised by the person making a complaint and the outcome/s they want; and
- any other relevant and any additional support the person making a complaint requires.

4.3 Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly, and preferably within 2 working days.

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

4.4 Initial assessment and addressing of complaints

Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control.

We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

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

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

Addressing complaints

After assessing the complaint, we will consider how to manage it. To manage a complaint, we may:



- Give the person making a complaint information or an explanation;
- Gather information from the product, person, or area that the complaint is about; or
- Investigate the claims made in the complaint.

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium.

Which actions we decide to take will be tailored to each case and consider any statutory requirements.

4.5 Providing reasons for decisions

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

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

4.6 Closing the complaint, record keeping, redress and review

We will keep comprehensive records about:

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

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

4.7 Right to access the independent Ombudsman Scheme

We will inform people who make complaints to or about us about any internal or external review options available to them, including the Energy & Water Ombudsman NSW (EWON), ACT Civil and Administrative Tribunal, Energy and Water Ombudsman Queensland, Energy



and Water Ombudsman South Australia, Energy Ombudsman Tasmania and Energy and Water Ombudsman Victoria.

All our customers have the right to contact the Energy Ombudsman at any time for independent advice and assistance.

State	Ombudsman	Contact Details
Australian Capital Territory	ACT Civil and Administrative Tribunal	Phone 02 6207 1740Website www.acat.act.gov.au
New South Wales	Energy & Water Ombudsman NSW	Free call 1800 246 545Free fax 1800 812 291Post Reply Paid 86550, Sydney South NSW 1234Email complaints@ewon.com.au Website www.ewon.com.au
Queensland	Energy and Water Ombudsman Queensland	Phone 1800 662 837Website www.ewoq.com.au
South Australia	Energy and Water Ombudsman South Australia	Phone 1800 665 565Website www.ewosa.com.au
Tasmania	Energy Ombudsman Tasmania	Phone 1800 001 170Website www.energyombudsman.tas.gov.au
Victoria	Energy and Water Ombudsman Victoria	Phone 1800 500 509Website www.ewov.com.au

4.8 Three Levels of Escalation

Our complaints management system provides three levels of escalation as follows:

1. Level 1: Frontline complaint handling and early resolution.
2. Level 2: Internal assessment and review of complaints.



3. Level 3: External assessment and review of complaints.

We aim to resolve the majority of complaints at Level 1. Frontline staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Though frontline staff should be able to address the majority of complaints received, we recognise the seriousness of some complaints or a complainant's dissatisfaction with how their matter has been dealt with may warrant the complaint being dealt with at a more senior level. Where this is the case, we may escalate the complaint to a more senior officer within GGP Energy.

Complainants who are dissatisfied with how frontline staff have addressed their complaint or its outcome should have the option of escalating their complaint to a person or area other than frontline staff.

If the complainant is still dissatisfied they should have the option to seek a review by an external complaint management body.

Where a complainant remains dissatisfied with the outcome of an internal review of their complaint, the complainant may seek an external review of our decision by the relevant state Ombudsman or by the ACT Civil and Administrative Tribunal, the details for which are provided above.

5. Accountability and learning

5.1 Analysis and evaluation of complaints

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

Regular reports will be run on:

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

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



Both reports and their analysis will be provided to GGP Energy's CEO and senior management for review.

5.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to ensure its effectiveness in responding to and resolving complaints and identify and correct deficiencies in the operation of the system. Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

5.3 Continuous improvement

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

- support the making and appropriate resolution of complaints;
- implement best practices in complaint handling;
- recognise and reward exemplary complaint handling by staff;
- regularly review the complaints management system and complaint data; and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.



Your ref JGS: 42600/11

26 November 2024

Jason Huang
Director
GGP Energy Pty Ltd

BY EMAIL: [REDACTED]
[REDACTED]

Dear Jason and Leo

External review – Risk Policy; Compliance Policy and Complaint & Dispute Resolution Policy

As requested, we have reviewed documents provided by GGP Energy Pty Ltd (**GGP**) as part of your application for accreditation by Australian Energy Regulator (**AER**) as an electricity retailer.

We have reviewed the following documents:

1. Risk Strategy;
2. Compliance Policy; and
3. Complaint and Dispute Resolution Policy.

(together, **the Policies**).

During the review, several observations have been made regarding the Policies. **Attached** are marked-up versions of the Policies reflecting our suggested amendments which have been made to give effect to identified areas for improvement.

Summarising our review, we believe (subject to the incorporation of our suggested amendments):

1. GGP has developed its Risk Strategy in line with AS/NZS ISO31000: 2018 – *Risk Management Guidelines*;
2. GGP has developed its Compliance Policy in line with AS/ISO 37301: 2023 – *Compliance Management Systems – Requirement with Guidance for Use*; and
3. GGP has developed its Complaint and Dispute Resolution Policy in line with AS 10002: 2022 – *Guidelines for complaint management in organizations*.

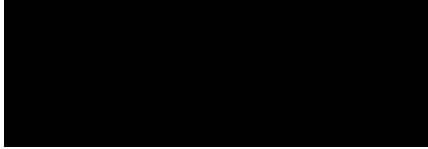
In our opinion, subject to the incorporation of our amendments, and subject to completion of highlighted blanks, the documentation provided by GGP for this review establishes a suitable high-level system to ensure that the company can meet its obligations as an authorised retailer. While the documentation is robust, it will be important that *all* the commitments contained in the policies are implemented *in full* on receipt of GGP’s retailer license authorisation from the AER.

GGP Energy Pty Ltd

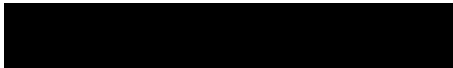
FINLAYSONS
LAWYERS

Please do not hesitate to contact me if you have any queries regarding the above.

Yours faithfully



Jeremy Schultz
Partner





[REDACTED]
ABN 14 619 158 191

Financial Resources

Criteria 5

I, SONG HUANG of [REDACTED], being Director of GGP ENERGY PTY LTD, declare that GGP ENERGY PTY LTD is a going concern and I am unaware of any factor that would impede GGP ENERGY PTY LTD's ability to finance its energy retail activities under the authorisation for the next 12 months.

Signature:

[REDACTED]

Song Huang

Sole Director

Date: 07/02/2025

31/07/2025

Independent financial declaration

This is to state that GGP Energy Pty Ltd bearing ABN 14 619 158 191 is our business client.

I, **Crystal Zhao** of [REDACTED], being an Accountant at **C&J Accountants & Advisors**, declare that:

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

Whatever stated here in above is as per the information provided by our client and based on the records available with us and we believe it to be true and correct.

Should any further clarification or information be required, please feel free to contact me at [REDACTED] or by email at [REDACTED]

[REDACTED]

Crystal Zhao
Director
C&J Accountants & Advisors



[REDACTED]
ABN 14 619 158 191

Suitability

Criteria 1

I, SONG HUANG of [REDACTED] being Director of GGP ENERGY PTY LTD, declare that GGP ENERGY PTY LTD, GGP ENERGY PTY LTD's associates, any other business where, GGP ENERGY PTY LTD's officers have held an officer position and any other entity that exerts control over GGP ENERGY PTY LTD has not had:

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

Signature:

[REDACTED]

Song Huang

Sole Director

Date: 07/02/2025



ABN 14 619 158 191

Suitability

Criteria 2

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

Signature:



Song Huang

Sole Director

Date: 07/02/2025



[REDACTED]
ABN 14 619 158 191

Suitability

Criteria 4

I, SONG HUANG of [REDACTED] being Director of GGP ENERGY PTY LTD, declare that:

- No member of GGP ENERGY PTY LTD's management team has been disqualified from the management of corporations;
- There is no record of bankruptcy, including in any overseas jurisdiction, of any member of GGP ENERGY PTY LTD's management team.

Signature:

[REDACTED]

Song Huang

Sole Director

Date: 07/07/2025