



ENERGY RETAIL AUTHORISATION APPLICATION

SUPA Energy

Date: April 2026

Status: Public

Regulator: Australian Energy Regulator (**AER**)

Version Control

Version	Amendment	Author and Date
Version 1	Not applicable	SUPA Energy

Introduction

This is an application by SUPA Energy Pty Limited (**SUPA Energy**) for a retail authorisation for the sale of electricity and natural gas (energy) in those states that have adopted the National Energy Consumer Framework. SUPA Energy is an Australian proprietary company limited by shares.

SUPA Energy is a full service utility with a focus on renewables, electric mobility, and the optimisation of critical energy infrastructure to serve consumers in high density, multi-occupancy buildings. Our focus is on ensuring that the price paid by consumers is competitive now and into the future (with a guarantee of power of choice).

SUPA Energy, a wholly owned subsidiary and division of Smart Urban Properties Australia Pty Limited (**SUPA**), operates across southern and eastern markets in Queensland, New South Wales, Australian Capital Territory, Victoria and South Australia, SUPA Energy partners with property investors, developers, and strata communities in both new and existing high density, multi-occupancy buildings.

Established in December 2022, SUPA is an innovative leader in converged infrastructure services, backed by IFM Investors. SUPA is a forward-thinking company focused on providing integrated utilities, telecommunications, and property technology services for high-density property markets.

SUPA's purpose is clear. To deliver smarter, safer, and more sustainable property solutions that enhance the lifestyles of the communities we serve.

SUPA was formed through the strategic merger of five reputable, multi-disciplinary companies: b.energy, Fibercorp, Epsilon Security, Smart Automation Systems and connecX. This integration brought together expertise in energy, telecommunications, security, and smart technologies. The post-merger success, driven by a cohesive management team, has firmly established SUPA as a leader in property, energy, and telecommunications sectors.

SUPA offers an extensive range of services designed to meet the needs of multi-occupancy properties and enhance property value:

- Affordable renewable energy solutions
- EV mobility infrastructure
- Super-fast gigabit fibre networks
- Advanced security and access controls
- Integrated smart building technologies

These services can be provided as integrated solutions or as standalone offerings, ensuring flexibility and quality for property owners and occupants.

Operational Divisions SUPA's operations are driven by four main divisions:

- SUPA Energy, redefining essential energy services
- SUPA Networks, delivering super-fast gigabit fibre
- SUPA Tech, enabling smarter, safer buildings
- connecX, connecting communities

Working closely with property investors, developers, and strata communities, SUPA Energy delivers cost-effective, reliable, and sustainable solutions. Our core offering, a capital invested managed services, known as the SUPA Advantage, combines cutting-edge infrastructure,

plant, equipment and services and with a capital-efficient, risk-free service model that enhances property value and tenant satisfaction. Our unmatched understanding of the operation of high density buildings from the perspective of load management, renewable generation, and tenant requirements mean that we can ensure sustainable outcomes that positively enhance the lives of our customers. Each property effectively operates as a microgrid that remains connected to the wider distribution network via one or more gate meters, thereby ensuring that there is continuity of supply subject to planned or unplanned outages at the distribution network level.

By having electricity flow into our microgrids combined with on-site renewable and storage solutions, we're able to offer competitive pricing and we're able to install and operate renewable technology on properties that may not otherwise be able to utilise renewable technology..

We recognise that consumers within embedded networks have the right and must be able to enjoy the same protections that are afforded to consumers who are located outside of an embedded network. By applying for a retail authorisation, we note that we will be subject to the full suite of consumer protections, including those within the National Energy Retail Rules and the National Energy Retail Law. We have done this because it is consistent with our commitment to our customers, and it is an extension of our existing operations.

As will be demonstrated within this application and any further information provided upon request, we meet the organisational and technical capacity requirements, we have the financial resources, and we are a suitable holder of a retail authorisation.

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
- **Annexures** to this document, as referenced throughout.

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

1. Part One: Required information – general particulars

	Required information	Response from SUPA Energy
A1	Fuel type Please enter either Electricity (E), Gas (G) or Dual (D)	D
A2	Existing or Start-up business	Existing
A3	Confidential documents - Please enter either - Yes or No	Yes
A4	Your legal name	SUPA Energy Pty Limited
A5	Your trading name if different to your legal name	Not applicable
A6	ABN or ACN	<p>ABN: 55 657 976 086</p> <p>ACN: 657 976 086</p> <p>Please refer to Annexures A1 (ASIC Extract) and A2 (Group Structure Chart).</p>
A7	A registered business address and address for correspondence	<p>Registered business address</p> <p>Suite 2, Level 4, 101 Moray Street, South Melbourne VIC 3205</p> <p>Address for correspondence</p> <p>PO Box 429, South Melbourne VIC 3205</p>
A8	A nominated contact person, including their position in the organisation and contact details	<p>Name: Connor James</p> <p>Position: Consultant</p> <p>Address: Level 2, 19 Brisbane Water Drive, Koolewong NSW 2256</p> <p>Email: connor@compliancequarter.com.au</p> <p>Mobile: [REDACTED]</p> <p>Please ensure that the consultant is copied in all correspondence.</p>

A9	The date you intend to commence retailing energy	April 2026
A10	The nature and scope of operations proposed (business model and size of operations, volume of customers)	<p>SUPA Energy operates in a rapidly growing market, with key opportunities across multiple segments in the Australian residential and commercial property sectors. The target market is large and diverse, encompassing greenfield and brownfield developments with a focus on sustainable energy, renewable solutions, and integrated technology.</p> <p>SUPA Energy in Queensland, New South Wales, Australian Capital Territory, Victoria and South Australia. At this point in time, we do not intend to operate within Tasmania. However, we are seeking an authorisation that covers each jurisdiction that has adopted the National Energy Customer Framework.</p> <p>[Redacted]</p> <p>SUPA Energy offers a comprehensive suite of services focused on delivering sustainable and efficient energy solutions to high-density, multi-occupancy buildings. The company's core products and services include:</p>

		<ul style="list-style-type: none"> • Wholesale Procurement and Retail Sale of Sustainable Energy, Hot Water, and Electric Mobility Solutions: SUPA Energy provides eco-friendly energy, hot water, and electric mobility services, supporting the transition to a cleaner, more sustainable future. • Advanced Metering Solutions: SUPA procures, owns, operates, repairs, replaces, and manages remote-read electrical and hydraulic metering systems. • Energy Infrastructure Management: SUPA owns, operates, and manages critical energy infrastructure, ensuring optimal operation and maintenance of key energy assets. • Critical Plant and Equipment Management: SUPA owns, operates, and manages embedded renewable generation systems (solar PV), battery energy storage systems, centralised and instantaneous hot water systems, and EV charging solutions, including dedicated and communal stations and EV car-sharing services. • Smart Customer Energy Management Systems: The development and management of smart systems that help residents monitor and control their energy usage, improving efficiency and cost-effectiveness. <p>Embedded Network Design Services: SUPA offers design expertise for embedded networks, optimising energy distribution and service delivery within multi-occupancy buildings. SUPA Energy's expanding services portfolio includes active, onboarding, under-construction, and awarded sites across various Australian states, illustrating its significant growth in energy, hot water, and EV charging services. The average number of services per customer is consistently increasing across our portfolio, highlighting the comprehensive service offerings per client. SUPA Energy's portfolio reflects strategic growth and diversification, emphasising reliability and large-scale service provision. The expanding portfolio positions SUPA Energy to further solidify its presence and cater to evolving energy and sustainability demands across Australia.</p> <p>The scope of operations in terms of customer numbers is set out in the annexed financial model, which has been prepared by our finance team and endorsed by the Board.</p> <p>The business has substantial in-house capabilities consisting of an experienced leadership team and staff.</p>
--	--	--

		<p>At Smart Urban Properties Australia (SUPA), the executive team collectively brings extensive experience across various sectors such as telecommunications and energy supported with specialist expertise in compliance, legal, regulatory, operations, human resources, and finance. They have overseen major mergers and acquisitions, managed significant infrastructure projects, and led prominent energy businesses.</p> <p>Overall, SUPA's executive team combines their diverse expertise to drive the company's success and innovation in smart urban development.</p> <p>The internal team has extensive management experience and energy markets expertise, it is also supported by experienced and respected consultants who provide specialists advice and services on a range of regulatory and compliance matters. Full bios of the relevant team member and details of specialist advisors are provided in this application.</p> <p>Please refer to Annexure A10 (and associated sub-annexures) provided on a commercial in confidence basis for details on all providers and individuals involved in SUPA Energy.</p>
A11	The jurisdictions in which you intend to retail energy	In each jurisdiction that has adopted the National Energy Customer Framework.
A12	The type of customers you intend to supply (for example, small customers, small market offer customers or large customers as defined in s. 5 of the Retail Law)	Small and Large residential and commercial who are located within embedded networks that are privately owned and connected to the wider distribution network.

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

Below we demonstrate organisational and technical capacity, as outlined in criterion 1 – 15.

2.1 Previous experience as an energy retailer (Criterion 1 to 3)

Criterion from Guideline	Required information	Response from SUPA Energy
B1: Criterion 1	Details of your (or any related parties) previous experience as an energy retailer	<p>The applicant has the benefit of individuals and suppliers with significant experience in the energy market.</p> <p>The individuals hired or engaged by the applicant have worked in or for energy retailers and including in energy compliance and risk management. Compliance and risk management have been identified as a key areas of focus by SUPA Energy.</p> <p>The executive management team and our specialist advisors have multiple decades in energy management experience and retail operations.</p> <p>Please refer to Annexures A3, and A10 provided on a commercial in confidence basis for details on all providers and individuals involved in SUPA Energy. Please also refer to Annexures C11 and C12.</p>
B.1	The date and location of previous operations (this should include related entities (if applicable))	The business has operated under retail exemptions in its prior operations. We note that those exemptions will be surrendered at the time that a retailer authorisation is issued.
B1.2	The form/s of energy sold	Electricity
B1.3	The scale of operations (including the number and size of customers)	<p>SUPA Energy serves a broad customer base across Australia, with a primary focus on residential customers, supplemented by business customers and an emerging electric mobility segment in EV charging services.</p> <ul style="list-style-type: none"> • Residential Customers: The majority of SUPA Energy's portfolio ██████ consists of residential customers, showing strong penetration across all states. • Business Customers: Representing ██████ of the portfolio, business customers are a key segment.

		<ul style="list-style-type: none"> • EV Charging Services: Although currently small [REDACTED] of the portfolio), and exclusive of our EV car sharing program, EV charging is an emerging area of focus, in line with the rise in sustainable transport solutions. <p>Customers:</p> <ul style="list-style-type: none"> • Residential: [REDACTED] • Business: [REDACTED] • EV Charging: [REDACTED] <p>SUPA Energy delivers in excess [REDACTED] services to these customers (active and under construction).</p>
B1.4	A description of how the retail activities were conducted	<p>The primary business activity of SUPA Energy is the provision of utilities and infrastructure to high density, multi-occupancy buildings. With respect to electricity and gas, the business has operated in a manner that is consistent with the National Energy Customer Framework requirements that apply to authorised retailers.</p> <p>The business has substantial internal resources within the Group and ongoing service agreements with industry leading suppliers of independent embedded network management services, progressive energy procurement, FRMP energy suppliers, remote read interval metering providers, meter data providers and billing platforms.</p>
B2: Criterion 2	Details of any other relevant retail or energy market experience	<p>As highlighted in Annexure C1 and above, SUPA Energy has an existing portfolio of energy services and pipeline of projects across various Australian states, illustrating its robust growth in energy, hot water, and EV charging services. The average number of services per customer is consistently increasing, highlighting the comprehensive service offerings per client.</p>
B3: Criterion 3	Where you do not have previous energy market experience, how you intend to bring this experience into your business	<p>Relevant retail experience includes both in those states that have adopted the National Energy Customer Framework and in Victoria. With experience across multiple jurisdictions, SUPA Energy is able to ensure that it continues to operate in a customer-centric manner as it increases the number of sites managed across relevant states.</p>

2.2 Experience of key employees (Criterion 4 to 6)

Criterion from Guideline	Required information	Response from SUPA Energy
B4: Criterion 4	An organisation chart showing the structure of your organisation (this should include Board members and Operational Managers)	Please find attached (Annexure A4).
B5: Criterion 5	The number of employees, broken down by business unit or other relevant classification (are employees shared with any other entities)	Please find attached (Annexure A4)
B6: 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 find attached (Annexure A5).

2.3 Third party involvement (Criterion 7)

Criterion from Guideline	Required information	Response from SUPA Energy
C7: 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>The business has substantial internal resources within the Group and ongoing service agreements with industry leading suppliers of independent embedded network management services, progressive energy procurement, FRMP energy suppliers, remote read interval metering providers, meter data providers and billing platforms.</p> <ul style="list-style-type: none"> • Independent embedded network management services: ENM Solutions, Intellihub & PLUS ES (for example Annexure A10.5 and A10.8)

		<ul style="list-style-type: none"> • Progressive energy procurement: [REDACTED] (Annexure A10.6) • FRMP energy suppliers: [REDACTED] [REDACTED] [REDACTED]. For each Connection Point for our embedded networks (see for example Annexure A10.8). • Remote read interval metering providers & meter data providers: Intellihub, PLUS ES & Yurika • Billing: Utilmate. (Annexure A10.1 and 10.2), an industry recognised billing platform used by other authorised retailers. • Regulatory Compliance: Overseen and managed by our internal team led by our Group General Counsel and Company Secretary, SUPA Energy will utilise the services of Compliance Quarter with respect to regulatory compliance.
C7.1	State all functions and activities you propose to outsource	Please see above.
C7.2	Provide a summary of the third party's experience in, and knowledge of, the relevant area	Please find attached capability statements for Compliance Quarter (Annexure A10.3) and Utilmate (Annexure A10.2). We note that various other entities are AEMO accredited (i.e. metering providers) or authorised retailers.
C7.3	Provide evidence of the third party's technical capacity to meet relevant obligations	Please see above.
C7.4	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)	<p>Please refer to the attached documents which detail the controls in place in relation to third parties. Please refer to Annexures B2 and B3).</p> <p>SUPA Energy has established comprehensive controls to ensure third parties operating on our behalf comply with all obligations under the Retail Law and Retail Rules. Our third-party management framework incorporates rigorous selection processes, detailed contractual requirements, ongoing monitoring, and regular compliance assessments.</p> <p>Prior to engagement, all potential third parties undergo thorough due diligence assessment</p>

		<p>evaluating their capability to meet compliance obligations. This includes reviewing their compliance history, examining existing policies and procedures, and assessing their understanding of relevant regulatory requirements. Our assessment particularly focuses on critical areas such as customer interaction protocols, data protection measures, and complaint handling procedures.</p> <p>Contractual arrangements with third parties incorporate specific compliance obligations through our Master Services Agreement and supporting documents. These establish clear accountability for regulatory compliance and include:</p> <ul style="list-style-type: none"> • Explicit reference to relevant sections of the Retail Law and Rules • Detailed service level agreements specifying compliance requirements • Mandatory compliance reporting obligations • Regular audit and inspection rights • Clear consequences for compliance breaches • Specific requirements for handling customer data and privacy • Incident reporting and escalation protocols • Staff training and competency requirements • Business continuity and disaster recovery obligations <p>Our third-party contracts require maintenance of documented compliance procedures aligned with SUPA Energy's standards. Third parties must demonstrate how their internal processes ensure compliance with all relevant obligations. This includes providing evidence of staff training programs, quality assurance measures, and compliance monitoring systems.</p> <p>Ongoing monitoring of third-party compliance includes regular performance reviews,</p>
--	--	--

		<p>compliance audits, and analysis of customer feedback. Our Titan system tracks third-party obligations and compliance reporting requirements. Monthly performance reports from third parties include compliance metrics and incident reporting, enabling early identification of potential issues.</p> <p>We maintain direct oversight of third-party customer interactions through transaction sampling, and customer feedback analysis. Quality assurance programs assess adherence to regulatory requirements and service standards. Regular compliance meetings with third-party management review performance trends and address emerging issues.</p> <p>Third parties must immediately report any actual or potential compliance breaches. Our incident management protocol ensures appropriate escalation and timely regulatory reporting where required. Investigation findings inform improvements to controls and procedures, with lessons learned incorporated into updated compliance requirements.</p> <p>Staff training requirements for third parties are clearly specified in our agreements. Third parties must demonstrate their staff have completed required training modules and maintain current knowledge of regulatory obligations. SUPA Energy provides access to our compliance training materials and updates on regulatory changes affecting third-party operations.</p> <p>Technology integration with third parties includes appropriate security controls and compliance monitoring capabilities. Data exchange protocols ensure protection of customer information and maintenance of required records. Regular testing verifies the effectiveness of these controls and business continuity arrangements.</p> <p>Annual compliance attestations are required from third-party senior management confirming adherence to all regulatory obligations. Material issues are escalated to the Board with corresponding action plans.</p> <p>Our third-party management framework undergoes regular review to ensure it remains</p>
--	--	--

		<p>effective and incorporates emerging compliance requirements. Updates to regulatory obligations are promptly communicated to third parties with clear implementation timeframes. The Compliance Committee oversees significant changes to third-party compliance arrangements.</p> <p>Through these comprehensive controls and ongoing oversight, SUPA Energy ensures third parties maintain appropriate compliance with their obligations under the Retail Law and Rules. Our systematic approach to third-party management provides assurance that customer interests are protected and regulatory obligations are consistently met across our extended operations.</p>
--	--	---

Please refer to Annexure A provided on a commercial in confidence basis for details on all providers and individuals involved in SUPA Energy.

2.4 Business plan (Criterion 8)

Please refer to Annexure C1 provided on a commercial in confidence basis, a copy of the applicant's business plan.

2.5 Compliance strategy (Criterion 9)

SUPA Energy has established a robust compliance management system aligned with ISO 37301:2021 standards, demonstrating our commitment to meeting all regulatory obligations and fostering a strong compliance culture throughout the organisation. Our comprehensive Compliance Policy (detailed in Annexure B1) outlines the framework through which we implement and maintain effective compliance controls across all business operations. The organisation's compliance obligations encompass multiple regulatory frameworks, including Energy Law (specifically the National Energy Retail Law, National Energy Retail Regulations and Victorian instruments), the Telecommunications Act 1997, the Do Not Call Register Act 2006, and the Australian Consumer Law as prescribed in Schedule 2 of the Competition and Consumer Act 2010. A detailed register of our regulatory obligations is maintained confidentially in Annexure B9.

Governance oversight is provided by SUPA Energy's Board, which holds ultimate responsibility for establishing and monitoring corporate governance and compliance standards. The Board is supported by a dedicated Compliance Committee comprising a Board member, our General Counsel, and key business managers. This committee develops and implements our compliance program through carefully crafted policies, procedures and training initiatives.

Our compliance framework is operationalised through several key mechanisms. We maintain compliance personnel who provide oversight of the program's implementation. External subject matter experts are regularly engaged to provide specialist compliance and legal advice. Technology plays a crucial role through our Compliance HUB (Titan) - a sophisticated cloud-based system that monitors regulatory obligations and implements associated controls. SUPA Energy has developed comprehensive documentation including detailed procedures

and policies to guide operational compliance. Regular compliance risk assessments are conducted to identify potential regulatory breaches and implement appropriate controls. These assessments evaluate the consequences and likelihood of non-compliance across all applicable obligations.

Staff capability is enhanced through ongoing training and assessment programs, reinforcing that regulatory compliance is fundamental to our operations. We utilise both internal resources and external training providers, including Compliance Quarter, who deliver specialised training through various channels including Titan, face-to-face sessions and webinars. Only appropriately qualified staff are employed in compliance-sensitive roles.

Our monitoring and reporting framework ensures that any compliance breaches are promptly identified, thoroughly investigated, and appropriately reported in accordance with our compliance plan and regulatory obligations. This systematic approach to compliance management demonstrates SUPA Energy's commitment to maintaining the highest standards of regulatory compliance and corporate governance.

The success of our compliance management system is underpinned by regular evaluation and continuous improvement processes, ensuring it remains effective and responsive to changes in our regulatory environment and business operations.

Criterion from Guideline	Required information	Response from SUPA Energy
C9: Criterion 9	Details of your compliance strategy	<p>Our compliance strategy centres on a structured, risk-based approach to managing our regulatory obligations as an energy retailer. SUPA Energy's Board has established a comprehensive compliance framework that systematically identifies, monitors and maintains compliance with all applicable requirements under energy laws, consumer protection legislation, technical standards and industry codes.</p> <p>The cornerstone of our strategy is our three-tiered governance structure. The Board maintains ultimate accountability for compliance, supported by a dedicated Compliance Committee that develops and oversees implementation of our compliance program. Day-to-day compliance activities are managed by our General Counsel who works closely with business managers to embed compliance controls into operational processes.</p> <p>To systematically track and manage our obligations, we utilise the Compliance HUB (Titan) platform. This system maps all regulatory requirements applicable to our retail operations, including those under the National Energy Retail Law and Rules, state-based regulations, Australian Consumer Law, and relevant technical standards. Each obligation is assessed for compliance risk, with corresponding</p>

		<p>controls and monitoring activities assigned. The system provides real-time tracking of compliance activities and automated alerts for key regulatory deadlines and obligations.</p> <p>Our compliance monitoring program incorporates multiple verification layers. Regular self-assessments are conducted by business units, complemented by independent compliance reviews by our General Counsel. We also engage external compliance experts to conduct periodic audits of high-risk areas. This multi-layered approach helps ensure early identification of potential compliance issues.</p> <p>When compliance breaches are identified, our breach management protocol ensures swift and appropriate response. All incidents are logged in our compliance management system, triggering a structured investigation process. This includes immediate containment actions, root cause analysis, and development of corrective measures. For significant breaches, we have escalation procedures ensuring timely notification to the Board and relevant regulators. Customer impacts are promptly identified and remediated.</p> <p>Staff capability is fundamental to our compliance strategy. We maintain a comprehensive training program covering regulatory obligations, compliance procedures and breach reporting requirements. Training effectiveness is regularly assessed through competency checks and practical assessments. Key compliance staff undertake additional professional development to maintain current knowledge of regulatory requirements and industry best practices.</p> <p>Our compliance documentation framework provides clear guidance for staff through policies, procedures and work instructions. These are regularly reviewed and updated to reflect regulatory changes and operational improvements. Standard operating procedures incorporate compliance checkpoints and controls, making compliance an integral part of daily operations.</p> <p>Continuous improvement is built into our strategy through regular review mechanisms. Monthly compliance reports to management track key performance indicators and highlight emerging issues. Quarterly reviews by the Compliance Committee assess the effectiveness of our compliance framework and authorise necessary</p>
--	--	--

		<p>improvements. The Board conducts annual strategic reviews of our compliance performance and capability.</p> <p>External expertise supplements our internal capabilities. We maintain relationships with specialist compliance consultants and legal advisors who provide guidance on complex regulatory matters and validate our compliance approaches. This ensures our compliance strategy remains robust and aligned with industry best practices.</p> <p>Through this integrated strategy, SUPA Energy maintains effective oversight of its compliance obligations while fostering a strong compliance culture. Our approach emphasises prevention through robust controls while maintaining capability for swift detection and remedy of any breaches. Regular review and refinement of our strategy ensures we continue to meet our obligations as a responsible energy retailer.</p>
C9.1	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. Please refer to Annexure B9.
C9.2	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>Our compliance management system is built upon the strong foundation of leadership commitment and clear governance structures as required by Sections 4-5 of ISO 37301:2021. The Board and senior management actively demonstrate their commitment through direct oversight and resource allocation, while our dedicated Compliance Committee provides the operational framework for implementing compliance requirements. This committee, comprising Board representation, our General Counsel, and business managers, ensures the compliance function maintains appropriate authority and independence as specified in Section 5.1.3 of the standard.</p> <p>SUPA Energy maintains a comprehensive understanding of its compliance universe,</p>

	<p>encompassing National Energy Retail Law and Rules, state-specific energy regulations, technical and safety standards, consumer protection requirements, and industry codes. Our systematic risk assessment process, aligned with Section 4.6 of the standard, evaluates each obligation to identify potential compliance risks and implement proportionate controls. This risk-based approach ensures resources are effectively allocated to areas of greatest compliance impact.</p> <p>The operational implementation of our compliance framework is supported by robust documented procedures and policies governing all key processes. Central to this is Titan, a sophisticated cloud-based system that provides real-time tracking of obligations and controls. This technological solution is complemented by regular internal audits, compliance checks, and comprehensive staff training programs that ensure consistent application of compliance requirements across the organization.</p> <p>Our breach management process, developed in accordance with Sections 8.3, 8.4 and 10.2 of ISO 37301, provides a structured approach to identifying and addressing compliance issues. Early detection is facilitated through multiple channels including automated monitoring, regular audits, active staff reporting, and customer feedback analysis. When breaches are identified, our systematic assessment process evaluates immediate risks, conducts root cause analysis, and determines appropriate remediation steps. This includes not only immediate corrective actions and customer remediation where required, but also longer-term system and process improvements to prevent recurrence.</p> <p>Performance evaluation, as outlined in Section 9 of the standard, is embedded throughout our compliance framework. Regular reporting to the Board and management provides visibility of compliance performance, supported by meaningful metrics and key performance indicators. Our internal programs are supplemented by external compliance audits, ensuring independent verification of our compliance effectiveness. Management regularly reviews these inputs to assess the overall performance of our compliance management system.</p> <p>Continuous improvement, as prescribed by Section 10 of ISO 37301, is fundamental to our approach. We regularly review and update our compliance</p>
--	---

		<p>documentation, incorporate feedback from staff and stakeholders, and actively engage with industry developments and regulatory changes. Lessons learned from compliance incidents are systematically captured and used to enhance our controls and processes.</p> <p>Supporting this framework is a comprehensive resource allocation strategy aligned with Section 7 of the standard. We maintain a team of qualified compliance personnel, supplemented by external expert advice when needed. Our staff training and assessment program ensures consistent understanding of compliance obligations across the organization, while our investment in technology and systems provides the necessary tools for effective compliance management.</p> <p>Clear communication channels maintain the effectiveness of our compliance system. Regular updates keep staff informed of compliance requirements and changes, while established reporting mechanisms ensure compliance issues are promptly escalated and addressed. Our stakeholder engagement processes and regulatory liaison protocols maintain effective external communication channels.</p> <p>This integrated approach, firmly aligned with ISO 37301:2021, ensures SUPA Energy maintains robust compliance with all retailer obligations while fostering a strong compliance culture throughout the organization. Our systematic processes for identifying, assessing, and remedying compliance breaches, combined with our commitment to continuous improvement, provide assurance that we can meet and maintain our compliance obligations effectively</p>
C9.3	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 attached Complaints Policy Annexure B4.</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, facsimile, email or letter; • Acknowledge any complaint received as soon as possible; • Begin an investigation into the reasons for a complaint within 24 hours of acknowledgment;

		<ul style="list-style-type: none"> • 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.
C9.4	<p>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>	<p>SUPA Energy has implemented a comprehensive skills and knowledge management framework to ensure our team maintains the capabilities required for effective retail operations. Our approach begins with systematic skills gap analysis, followed by targeted recruitment and ongoing professional development programs.</p> <p>Through our skills mapping process, we have identified the core competencies required across key operational areas including regulatory compliance, customer service, technical operations, and risk management. Each role has documented competency requirements aligned with relevant industry standards, regulatory obligations and operational needs. This mapping includes both technical skills and knowledge requirements specific to energy retail operations.</p> <p>To identify gaps, we conduct regular capability assessments comparing current staff competencies against required standards. These assessments combine formal evaluations, supervisor observations, and self-assessments. Recent analysis identified specific development needs in areas including regulatory reporting requirements, hardship program management, and advanced metering infrastructure protocols.</p> <p>In response to identified gaps, we have implemented a multi-faceted development strategy. For immediate critical needs, we engage industry experts to provide specialist support while building internal capability. Our recruitment strategy targets professionals with demonstrated experience in energy retail operations, particularly in technical compliance and customer hardship management - areas identified as requiring additional expertise.</p> <p>Our training program addresses both immediate skill gaps and ongoing development needs. New staff undergo comprehensive induction training covering energy retail fundamentals, regulatory obligations, and operational procedures. This is</p>

	<p>supplemented by role-specific technical training tailored to individual responsibilities. Regular refresher training ensures knowledge remains current, particularly regarding regulatory requirements and compliance obligations.</p> <p>To ensure training effectiveness, we employ a variety of delivery methods including structured classroom sessions, online modules, and practical workshops. External training providers deliver specialized technical content, while internal subject matter experts conduct operational training. All training is assessed through practical demonstrations of competency, ensuring staff can apply learning in their roles.</p> <p>We maintain detailed training records tracking individual staff development progress, completed training modules, and outstanding development needs. Regular performance reviews incorporate competency assessments and update individual development plans. This systematic approach ensures we maintain clear visibility of our capability status and development progress.</p> <p>Succession planning forms an important component of our capability strategy. Key positions have identified succession candidates who receive additional development to ensure continuity of critical functions. This includes rotating staff through different roles to build broader operational understanding and create backup capability for essential functions.</p> <p>Professional development extends beyond immediate role requirements. Staff are supported to pursue relevant industry qualifications and attend sector conferences to maintain current knowledge of industry developments and emerging trends. Our General Counsel and key technical staff maintain membership in relevant professional bodies and participate in industry working groups.</p> <p>Technology training receives particular focus given its critical role in modern retail operations. Staff undergo regular updates on our compliance management systems, customer relationship management platforms, and regulatory reporting tools. This ensures efficient use of our technology infrastructure in supporting compliant operations.</p> <p>Knowledge management systems help capture and share expertise across the organization. Our documented procedures incorporate lessons</p>
--	---

		<p>learned and best practices, while regular team briefings facilitate knowledge sharing between experienced and newer staff. This structured approach to knowledge transfer helps maintain operational capability as staff changes occur.</p> <p>Effectiveness of our capability development program is monitored through several mechanisms. Training completion rates and competency assessment results provide quantitative measures, while customer feedback and operational performance metrics offer qualitative indicators of capability improvements. Regular reviews by the Compliance Committee assess the ongoing adequacy of our capability development program.</p> <p>Through this comprehensive approach to capability management, SUPA Energy ensures our team maintains the skills and knowledge required for compliant retail operations. Our ongoing commitment to professional development, combined with strategic recruitment and effective knowledge management, provides a solid foundation for meeting our operational and regulatory obligations.</p> <p>Please refer to Annexure B22.</p>
--	--	---

2.6 Risk management strategy (Criterion 10 to 12)

Criterion from Guideline	Required information	Response from SUPA Energy
D10: Criterion 10	A copy of your risk management strategy covering both operational and financial risks	<p>Please find attached to this application a copy of SUPA Energy's Risk Management Policy covering both operational and financial risks.</p> <p>Please refer to Annexures B16 (Risk Register) and B12 (Risk Management Framework).</p>
D11: 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)	<p>Please find attached to this application a copy of the letter of assurance provided by a suitably qualified and independent entity.</p> <p>Please refer to Annexure D1.</p>

<p>D12: Criterion 12</p>	<p>Any additional information which demonstrates your 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>Please refer to the attached policies and procedures which demonstrate a well-documented risk management and compliance management framework.</p> <p>Please refer to the following Annexures:</p> <ul style="list-style-type: none"> • Annexure B1 Retail Compliance Policy • Annexure B10 Family Violence Policy NECF • Annexure B11 Customer Hardship Policy NECF • Annexure B12 SUPA Risk Management Framework • Annexure B13 SUPA Conflict of Interest Policy • Annexure B15 Key Reporting Dates • Annexure B16 Risk Register • Annexure B19 NECF Disconnection for non-payment checklist • Annexure B2 SUPA Privacy Policy • Annexure B2 Third Party Compliance Monitoring and Reporting Process • Annexure B20 Third Party Supplier or Software Selection process • Annexure B21 Third Party Management Oversight Process • Annexure B22 Energy Retailer Resourcing Plan • Annexure B24 Code of Conduct • Annexure B25 SUPA Disciplinary Policy • Annexure B26 SUPA Equal Employment & Anti-Discrimination Policy • Annexure B27 SUPA Family and Domestic Violence Support • Annexure B28 SUPA Grievance Policy • Annexure B29 SUPA IT Security Policy • Annexure B3 Third Party Management Policy • Annexure B30 SUPA Recruitment Policy • Annexure B31 SUPA Whistleblower Policy • Annexure B4 Complaints and Dispute Resolution Procedure
------------------------------	---	--

		<ul style="list-style-type: none"> • Annexure B5 SUPA Code of Ethics • Annexure B6 Audit Policy • Annexure B7 SUPA Anti-Bribery Policy • Annexure B9 Obligations register - NECF (Electricity Gas)
--	--	--

2.7 Ombudsman Schemes, Agreements with key market players (eg. distribution businesses and AEMO) (Criterion 13 to 15)

Criterion from Guideline	Required information	Response from SUPA Energy
E13: 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	Please refer to the attached evidence showing membership of relevant jurisdictional ombudsman schemes. Please refer to Annexure 32.
E14: 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	As SUPA Energy is not seeking to register as an AEMO Market Participant at this time, SUPA Energy has not finalised any further agreements with energy distributors, other than those required for establishing Connection Points to our embedded network sites in their regions and in accordance with all energy laws, rules, regulations, codes and standards. These are specific to each embedded network site.
E14a: 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	The likelihood of any insolvency event affecting SUPA Energy is extremely low due to the robust financial resources available to the company. SUPA Energy's sound financial position ensures its ability to meet its obligations and operate sustainably in the long term.

		<p>In the exceptional circumstance of an insolvency event, Section 600F of the Corporations Act 2001 provides critical protections to ensure that essential services, such as energy supply, are not automatically discontinued. Under Section 600F, suppliers of essential services are prohibited from refusing supply solely due to outstanding debts owed by the company or making payment of such debts a condition for continued supply. This legislative safeguard ensures that residents within the embedded network would not face disconnection of energy supply solely as a consequence of an insolvency event affecting SUPA Energy.</p> <p>Additionally, in the event of insolvency, the relevant property owner would engage with the appointed administrators to negotiate the management of assets located on-site. Potential outcomes of such negotiations could include the purchase of these assets by the property owner or the sale of the assets to a third party. In scenarios where a deed of company arrangement is entered into, it would likely facilitate the ongoing operations of the embedded network.</p> <p>In summary, SUPA Energy has a low risk of insolvency due to its strong financial standing. Even in the rare event of insolvency, statutory protections under Section 600F of the Corporations Act 2001 and practical measures, such as asset negotiations, provide assurance that energy supply to residents within the embedded network will remain unaffected.</p>
E15: Criterion 15	Any additional information that will help us assess your organisational and technical capacity	<p>We refer you to each of the annexures that make up this application including the following:</p> <ul style="list-style-type: none"> • Annexure A2 Group Structure chart • Annexure A3 Consolidated CVs • Annexure A32 Ombudsman scheme membership • Annexure A4 SUPA Energy Organisational Structure October 2024 • Annexure A5 Bio [REDACTED]

Additional supporting information (organisational and technical)

<p>E16: 1.</p>	<p>Detail the organisational approach to managing risks.</p> <ul style="list-style-type: none"> • Include a discussion of the skills, experience and compliance history of the director(s) and key office holders 	<p>██████████, General Counsel and Company Secretary of SUPA, leads our organisational risk management bringing extensive legal and corporate governance expertise.</p> <p>Please refer to the following Annexures:</p> <ul style="list-style-type: none"> • Annexure B1 Retail Compliance Policy • Annexure B16 Risk Register • Annexure B12 SUPA Risk Management Framework • Annexure C2 Market Report - AER Additional information
<p>E17: 2.</p>	<p>Identify particular risks to the business</p> <ul style="list-style-type: none"> • Is wholesale price risk incurred through spot market trading addressed in the risk management strategy? 	<p>Refer to Annexure E17: Risk Management Policy.</p> <p>SUPA Energy recognises the potential for wholesale price risk due to fluctuations in the wholesale electricity market. Our risk management strategy explicitly addresses this risk to ensure financial stability and competitive pricing for our customers.</p> <p>Risk Management Strategy</p> <ul style="list-style-type: none"> • Comprehensive Risk Assessment: Our Risk Management Policy and Business Plan outline thorough risk assessments that identify potential risks, evaluate their likelihood, and develop strategies to mitigate them. This proactive approach enables us to understand and manage the implications of wholesale electricity market volatility. • Progressive Electricity Procurement Strategy: To manage wholesale price risks effectively, ██████████ ██████████ ██████████ ██████████ <p>This method removes exposure to spot market trading, allowing us to spread risk and mitigate the impact of price volatility. By taking advantage of favourable market conditions, we can</p>

		<p>lock in competitive prices, ensuring stability in our cost structure.</p> <ul style="list-style-type: none"> • Regular Market Assessments: We continuously monitor wholesale electricity market trends and align our procurement strategies with regulatory price determinations. This ensures our approach reflects both current and anticipated market conditions, enabling us to adapt as needed. • Diversification of Procurement Activities: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] • Engagement with Expert Partners: SUPA Energy collaborates closely with our appointed electricity trading partner, [REDACTED], who provides expert insights into market conditions and optimal hedging strategies. Their expertise allows us to make informed decisions that align with our risk management objectives. <p>Our comprehensive risk management strategy effectively addresses wholesale price risks associated with spot market trading. By implementing a progressive load following electricity procurement approach, conducting regular market assessments, and engaging expert partners, SUPA Energy is well-equipped to mitigate price volatility and protect our business and customers from unexpected market changes. This proactive stance not only safeguards our financial performance but also reinforces our commitment to delivering competitive pricing and reliable service.</p>
<p>E18: 3.</p>	<p>Detail how each risk will be mitigated</p> <ul style="list-style-type: none"> • risk management and mitigation measures should include strategies to deal with additional risks 	<p>Please refer to the following:</p> <ul style="list-style-type: none"> • Annexure B16 Risk Register • Annexure B12 SUPA Risk Management Framework

	associated with higher costs	
E19: 4.	<p>Risk management strategy should include:</p> <ul style="list-style-type: none"> • A risk appetite statement articulating how much risk is acceptable to the applicant 	<p>Please refer to the following:</p> <ul style="list-style-type: none"> • Annexure B16 Risk Register • Annexure B12 SUPA Risk Management Framework
E20: 5.	<p>Produce a risk map:</p> <ul style="list-style-type: none"> • Identify risks inherent in the proposed business • Identify likelihood of each risk occurring • Determine impact of each risk on business <ul style="list-style-type: none"> ○ Include a discussion of risks associated with each stress test. 	<p>Please refer to the following:</p> <ul style="list-style-type: none"> • Annexure B16 Risk Register • Annexure B12 SUPA Risk Management Framework
E21: 6.	<p>Discuss access to extra cash reserves to cover extra costs when risks occur. Provide evidence of:</p> <ul style="list-style-type: none"> • bank balances, loan guarantees and the like. <p>Is this cash enough to cover operations over a 3-year time horizon to enable the business to continue to service all existing customers and continue growing the customer base?</p>	<p>The group has circa █████ cash at bank as at the date of this application with no loans and no guarantees.</p> <p>It is envisaged these cash reserves are more than sufficient to cover any extra costs when risks occur.</p> <p>In the event additional funds are required the business has the option to access additional cash via:</p> <ul style="list-style-type: none"> - issuing additional shares (equity) - related party loans - establishing working capital and capital expenditure facilities with a major bank
E22: 7.	<p>Set out processes for identifying and addressing risks.</p> <ul style="list-style-type: none"> • Include proactive and reactive strategies 	<p>Please refer to the following:</p> <ul style="list-style-type: none"> • Annexure B16 Risk Register • Annexure B12 SUPA Risk Management Framework

	<ul style="list-style-type: none"> • Include systems, reports, business controls • Ensure transparency of risk positions and management activities 	
E23: 8.	<p>For each risk:</p> <ul style="list-style-type: none"> • identify the residual risks and set out how you will address them • set out roles of responsible officers • include policies and procedures providing guidance for day-to-day risk management activities 	<p>Please refer to the following:</p> <ul style="list-style-type: none"> • Annexure B16 Risk Register • Annexure B12 SUPA Risk Management Framework
E24: 9.	<p>Is the risk management strategy proportionate to the size, operating model, and complexity of proposed retail operations</p>	<p>Yes, our risk management strategy is proportionate to the size, operating model, and complexity of our proposed retail operations. This proportionality is demonstrated in several key ways:</p> <ol style="list-style-type: none"> 1. Operating Model Alignment <ul style="list-style-type: none"> • Our strategy is specifically tailored to our business structure as an embedded network operator • The risks we address are distinct from those faced by larger, authorised retailers • Our controls and mitigation measures are designed to match our specific retail operating model 2. Key Risk Focus Our strategy concentrates on risks most relevant to our operations: <ul style="list-style-type: none"> • Wholesale price volatility • Customer service capacity • Regulatory compliance • Network infrastructure management 3. Efficient Resource Allocation

		<ul style="list-style-type: none"> • We maintain robust oversight without overburdening the business with unnecessary processes • Controls are scaled appropriately to our business size • Risk management procedures are integrated into daily operations in a practical, manageable way <p>4. Adaptable Framework</p> <ul style="list-style-type: none"> • Our approach allows for flexibility as the business grows • Risk management processes can be scaled up or down based on operational needs • Regular reviews ensure our strategy remains appropriate for our business size and complexity <p>This balanced approach ensures we can effectively manage risks while maintaining operational efficiency appropriate to our business scale and model.</p>
<p>E25: 10.</p>	<p>How will wholesale price risks be managed?</p> <ul style="list-style-type: none"> • For electricity, will you hedge part or all of the load? • For gas, how will you mitigate wholesale price risks? • What proportion of customer load will you buy from spot markets? • For electricity, will you trade on the ASX or buy over the counter (OTC) products? • For electricity, if buying OTC products: <ul style="list-style-type: none"> ○ Who from? ○ Provide evidence of negotiations, 	<p>SUPA Energy will manage wholesale price risks through a strategic managed procurement approach that combines several key elements:</p> <p>[Redacted]</p>

	including pricing quotes.	
--	---------------------------------	--

<p>E26: 11.</p>	<p>Who in the business is responsible for purchasing contracts? Outline their experience in managing risk and purchasing wholesale electricity and gas contracts</p>	<p>At SUPA Energy, all energy contracts are managed in alignment with our board-approved Risk Management Policy, Energy Management Plan, and the Delegation of Authorities. The purchasing of wholesale electricity and gas contracts is led by our Commercial Manager, [REDACTED]. This process involves collaboration with our Group Chief Executive Officer, Chief Financial Officer, General Counsel, and is supported by our Commercial Manager and Energy Analyst, alongside our appointed hedging partner, [REDACTED].</p> <p>The collective expertise of the Executive team provide SUPA Energy with a strong foundation for effective contract management. Our ongoing partnership with [REDACTED] enhances our capabilities in navigating the complexities of the energy market. Further documentation detailing our contract management processes, including engagement with [REDACTED], is available in the supporting materials.</p> <p>Please refer to the following Annexures:</p> <ul style="list-style-type: none"> • Annexure C1 Business Plan • Annexure C2 Market Report - AER Additional information • Annexure A10.6 [REDACTED] - b.energy Outsourcing Services Agreement (and associated novation deed). • Annexure A10.8 A14 [REDACTED] Retail
<p>E27: 12.</p>	<p>If planning other means to mitigate wholesale price risks, for example:</p> <ul style="list-style-type: none"> • acquiring generation assets • entering long-term supply contracts with third parties • making other purchasing arrangements 	<p>SUPA Energy will mitigate wholesale price risks through a combination of progressive sustainability initiatives and strategic procurement measures, focusing on electrification, renewables, and electric mobility. Key elements of our approach include:</p>

	<ul style="list-style-type: none">• describe how these measures will limit/mitigate wholesale price risks	[Redacted]
--	---	------------

3. Part Three: Required information – financial resources

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

Criterion from Guideline	Required information	Response from SUPA Energy
<p>F1: Criterion 1</p>	<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>Please refer to the following annexures:</p> <ul style="list-style-type: none"> • Annexure D5 Smart Urban Properties Aust Financial Declaration - Accountants Statement • Annexure F1 Latest FY25 Financials Oct 2024 - Energy Only • Annexure F2 SUPA Group - Latest FY25 Financials Oct 2024 • Annexure F3 Financial Report for the year ended 30 June 2024 - SUPA Signed • Annexure F4 SUPA Energy Bank statement [REDACTED] • Annexure FM1 SUPA - Authorised Retailer Financial Model FY25-FY30_Base Case • Annexure FM2 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 1 • Annexure FM3 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 3 • Annexure FM4 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 4 • Annexure FM5 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 5 • Annexure FM6 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 2

F2: Criterion 2	<u>Existing businesses</u> Evidence of long and / or short term credit rating/s (if available).	Not applicable.
F3: Criterion 3	<u>Start-up businesses</u> 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	Not applicable.
F4: Criterion 4	<u>Existing and Start-up businesses</u> 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 -	SUPA Energy is a wholly owned subsidiary of Smart Urban Properties Australia Pty Limited (SUPA). Please refer to the following annexures: <ul style="list-style-type: none"> • Annexure C11 Supa Energy Deed of Cross Guarantee • Annexure C12 SUPA Energy Intercompany Services Agreement
F4.1	Details of the ownership structure of the group (including relationships with group entities). If you are not a group but a standalone entity you should also provide details of your ownership structure.	Please refer to Annexure A2 provided on a commercial in confidence basis, a copy of the applicant's group structure.
F4.2	The contractual arrangements (e.g. alliance contracts, associate contracts, establishment contracts) that define relationships within the group— including shared resources (such as office space, staff, sales	Please refer to the following annexures: <ul style="list-style-type: none"> • Annexure C11 Supa Energy Deed of Cross Guarantee • Annexure C12 SUPA Energy Intercompany Services Agreement

	channel, any other resource), guarantees, revenue flows, obligations and/or responsibilities	
F4.3	Consolidated audited financial statements for the group	Please refer to Annexure F3 Financial Report for the year ended 30 June 2024 - SUPA Signed
G1: Criterion 5	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 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	Please refer to Annexure D6.
G2:Criterion 6	A written declaration, from an independent auditor/accountant or your principal financial institution stating that -	Please refer to the following: <ul style="list-style-type: none"> Annexure D5 Smart Urban Properties Aust Financial Declaration - Accountants Statement
6.1	An insolvency official has not been appointed in respect of the business or any property of the business	SUPA Energy confirms that an insolvency official has not been appointed in respect of the business or any property of the business.
6.2	No application or order has been made, resolution passed or steps taken to pass a resolution for the winding up or	SUPA Energy confirms that no application or order has been made, resolution passed or steps taken to pass a resolution for the winding up or dissolution of the business.

	dissolution of the business	
6.3	They are unaware of any other factor that would impede your ability to finance your energy retail activities under the authorisation	SUPA Energy is unaware of any other factor that would impede its ability to finance its energy retail activities under the authorisation.
G3: Criterion 7	Details of any bank guarantees or arrangements or process to access additional capital	<p>The group currently has circa █████ cash at bank as at the date of this application (with no loans and no guarantees)</p> <p>It is envisaged these cash reserves are more than sufficient to cover any extra costs when risks occur.</p> <p>In the event additional funds are required the business has the option to access additional cash via:</p> <ul style="list-style-type: none"> - issuing additional shares (equity) - related party loans - establishing a working capital or capex financing facility with a major bank
G4: Criterion 8	Forecast revenue and expenses for three to five years or to the point where your business is cash-flow positive, whichever is the latter. This forecast should include profit and loss, cash flow, and balance sheet and be consistent with your business plan and highlight all key assumptions and risks	<p>Please refer to the following annexures:</p> <ul style="list-style-type: none"> • Annexure FM1 SUPA - Authorised Retailer Financial Model FY25-FY30_Base Case • Annexure FM2 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 1 • Annexure FM3 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 3 • Annexure FM4 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 4 • Annexure FM5 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 5 • Annexure FM6 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 2

<p>G5: Criterion 9</p>	<p>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>	<p>Please see above and attached.</p>
<p>Additional supporting information (financial)</p>		
<p>H1: 1.</p>	<p><i>Baseline scenario (electricity and gas applications)</i></p> <p>Include:</p> <ul style="list-style-type: none"> • profit and loss • cash flow • balance sheet <p>Provide 3 years of data in monthly increments.</p>	<p>A five year three way financial forecast (by month) for the baseline scenario has been provided including the following financial reports</p> <ul style="list-style-type: none"> - Operating Statement - Balance Sheet - Cash Flow Statement - Annexure FM1 SUPA - Authorised Retailer Financial Model FY25-FY30_Base Case - Annexure FM2 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 1 - Annexure FM3 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 3 - Annexure FM4 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 4 - Annexure FM5 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 5 - Annexure FM6 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 2
<p>H2: 2.</p>	<p>Financial information must correspond to the business plan and organisational and technical capacity information</p> <p><i>(Ibid)</i></p>	<p>The financial plan provided corresponds with the business plan and organisational and technical capabilities.</p>

<p>H3: 3.</p>	<p>You must:</p> <ul style="list-style-type: none"> • separately list all assumptions underlying the data • itemise all costs to the business, including prudential costs • include customer acquisition numbers (for 3 years in monthly increments) • set out expected customer load under POE50 demand conditions (shown in average MWh demand for each month)? <p><i>(Ibid)</i></p>	<p>The attached provides a detailed financial plan including a complete list of underlying assumptions.</p> <p>Key assumptions Underlying the plan include:</p> <ul style="list-style-type: none"> • Residential Customer Consumption: Average annual electricity consumption is assumed to be █████ kWh. • Business Customer Consumption: Average annual electricity consumption is assumed to be █████ kWh. • Customer Acquisition Numbers: Monthly increments for customer acquisition are based on historical growth trends, our current contracted project pipeline and marketing initiatives over the last three years. • Load Conditions: Expected customer load is based on POE50 demand conditions, reflecting average monthly MWh demand. <p>Costs to the Business:</p> <ul style="list-style-type: none"> • Electricity Procurement Costs: Costs associated with purchasing electricity through authorised retailers, which include fixed and variable charges. • Operational Costs: Operating expenses related to customer service and support. • Customer Acquisition Costs: Marketing and business development investments aimed at attracting new customers. • Regulatory Compliance Costs: Costs related to maintaining compliance with regulatory requirements. • Prudential Costs: Not applicable, as we are not trading directly in the wholesale electricity market as an AEMO market participant
<p>H4: 4.</p>	<p><i>Stress test scenario 1 (electricity and gas applications)</i></p> <p>Customer acquisition path 50% of that</p>	<p>The five year three way financial forecast (by month) covers each of the scenarios requested:</p> <ul style="list-style-type: none"> - Baseline Scenario (the business plan as approved by the SUPA Group Board Of Directors being the best estimate of

	<p>specified in the baseline business plan (all else equal)</p> <p>Provide (3 years of data in monthly increments):</p> <ul style="list-style-type: none"> • profit and loss • cash flow • balance sheet <p><i>(Ibid)</i></p>	<p>financial forecast based upon known conditions, customer contracts and supplier agreements):</p> <p>Please refer to the following annexures:</p> <ul style="list-style-type: none"> • Annexure FM1 SUPA - Authorised Retailer Financial Model FY25-FY30_Base Case • Annexure FM2 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 1 • Annexure FM3 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 3 • Annexure FM4 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 4 • Annexure FM5 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 5 • Annexure FM6 SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 2
--	--	--

4. Part Four: Required information – suitability

SUPA Energy is a fit and proper entity to hold a retail authorisation. Neither itself, its related body corporates, its officers or associates have had any criminal or civil convictions. Below we address criterion 1 to 7

Criterion from Guideline	Required information	Response from SUPA Energy
I1: 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 -	

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.
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.
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.
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.
1.5	any situation/s where you (or an associate) have previously triggered the RoLR provisions of the Retail Law or equivalent state/territory/foreign legislation, or have transferred or surrendered an authorisation or licence in circumstances where if not done, triggering a	There have been no such situations.

	RoLR event would have been likely	
I2: 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.
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.
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.
I3:	Upon request, a criminal history check	The applicant is willing to provide this on request.

Criterion 3	conducted within the past 12 months for persons listed under information requirement 2	
I4: Criterion 4	Written declarations from your Chief Financial Officer (or Chief Executive Officer) -	Please refer to the attached declaration.
4.1	that members of your management team have not been disqualified from the management of corporations	As above.
4.2	about the record of bankruptcy of your management team (including in any overseas jurisdiction)	As above.
I5: Criterion 5	Full names and current residential addresses of all your officers	Please find below.
CI6: Criterion 6	Details of policies and procedures addressing the probity and competence of officers and any other key management staff	Please find attached documents which are relevant to this component of the application: <ul style="list-style-type: none"> • Annexure B1 Retail Compliance Policy • Annexure B24 Code of Conduct v2 • Annexure B25 SUPA Disciplinary Policy • Annexure B12 SUPA Risk Management Framework • Annexure B13 SUPA Conflict of Interest Policy • Annexure B5 SUPA Code of Ethics • Annexure B6 Audit Policy • Annexure B7 SUPA Anti-Bribery Policy
CI7: Criterion 7	Any additional information that will assist us in our consideration of the character and past	Please see above.

	performance of your officers. If there has been a compliance issue, how will this be addressed in your future operations	
--	--	--

Annexures Table

Annexure Reference	Annexure Description	Status
A1	ASIC Extract Supa Energy Pty Ltd	PUBLIC
A2	Group Structure chart	PUBLIC
A3	Consolidated CVs	Confidential
A4	SUPA Energy Organisational Structure October 2024	Confidential
A5	Bio [REDACTED]	Confidential
A6	Bio_SUPA non executive directors	Confidential
A8	Officers Names and Addresses	Confidential
A10.1	Ultimate Terms of Use - SUPA Energy Pty Ltd	Confidential
A10.2	Ultimate - Capability Statement	Confidential
A10.3	CQ - Capability Statement	PUBLIC
A10.4	CQ and SUPA Energy Agreement	Confidential
A10.5	Intellihub_2021_master agreement	Confidential
A10.6	Deed of Novation [REDACTED]	Confidential
A10.6	Executed Embedded Network Services Agreement	Confidential
A10.6	[REDACTED] - b.energy Outsourcing Services Agreement_Clean Final (130322) Executed	Confidential
A10.8	[REDACTED]	Confidential
A10.8	[REDACTED]	Confidential
A10.8	[REDACTED]	Confidential
A10.9	[REDACTED]	Confidential
10.10	[REDACTED]	Confidential
A32	Ombudsman scheme membership	Confidential
A10.7	10.6 Deed of Novation - BEfficient to SUP - Executed	Confidential
A10.7	10.7 ENM_Management_agreement_- _Benergy_ENM Solutions_signed	Confidential
B1	Retail Compliance Policy	PUBLIC
B2	SUPA Privacy Policy	PUBLIC
B2	Third Party Compliance Monitoring and Reporting Process	Confidential
B3	Third Party Management Policy	PUBLIC
B4	Complaints and Dispute Resolution Procedure	PUBLIC
B5	SUPA Code of Ethics	Confidential
B6	Audit Policy	Confidential
B7	SUPA Anti-Bribery Policy	Confidential
B9	Obligations register - NECF (Electricity Gas)	Confidential
B10	Family Violence Policy NECF	PUBLIC
B11	Customer Hardship Policy NECF	PUBLIC
B12	SUPA Risk Management Framework	Confidential

B13	SUPA Conflict of Interest Policy	Confidential
B15	Key Reporting Dates	Confidential
B16	Risk Register	Confidential
B19	NECF Disconnection for non-payment checklist	Confidential
B20	Third Party Supplier or Software Selection process	Confidential
B21	Third Party Management Oversight Process	Confidential
B22	Energy Retailer Resourcing Plan	Confidential
B24	Code of Conduct v2	Confidential
B25	SUPA Disciplinary Policy	Confidential
B26	SUPA Equal Employment & Anti-Discrimination Policy	Confidential
B27	SUPA Family and Domestic Violence Support	Confidential
B28	SUPA Grievance Policy	Confidential
B29	SUPA IT Security Policy	Confidential
B30	SUPA Recruitment Policy	Confidential
B31	SUPA Whistleblower Policy	Confidential
C1	Business Plan	Confidential
C2	Market Report - AER Additional information	Confidential
C8	Smart Urban Properties Australia Pty Ltd- Financial Report for the year ended-30062023	Confidential
C11	Supa Energy Deed of Cross Guarantee	Confidential
C12	SUPA Energy Intercompany Services Agreement	Confidential
D1	Risk and Compliance Audit Action Verification Letter Nov 2024	Public
D2	Supa Energy Pty Ltd Suitability Criteria 1	Public
D3	Supa Energy Pty Ltd suitability criteria 2	Public
D4	Supa Energy Pty Ltd suitability criteria 4	Public
D5	Smart Urban Properties Aust Financial Declaration - Accountants Statement	Public
D6	Supa Energy Pty Ltd CEO Declaration- criteria 5	Public
F1	Latest FY25 Financials Oct 2024 - Energy Only	Confidential
F2	SUPA Group - Latest FY25 Financials Oct 2024	Confidential
F3	Financial Report for the year ended 30 June 2024 - SUPA Signed	Confidential
F4	SUPA Energy Bank statement CBA	Confidential
FM1	SUPA - Authorised Retailer Financial Model FY25-FY30_Base Case	Confidential
FM2	SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 1	Confidential
FM3	SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 3	Confidential
FM4	SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 4	Confidential
FM5	SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 5	Confidential
FM6	SUPA - Authorised Retailer Financial Model FY25-FY30_Stress Test 2	Confidential
C13	SUPA - Syndicated facility agreement	Confidential

ASIC Data Extracted 28/08/2025 at 15:38

This extract contains information derived from the Australian Securities and Investment Commission's (ASIC) database under section 1274A of the Corporations Act 2001. Please advise ASIC of any error or omission which you may identify.

- 657 976 086 SUPA ENERGY PTY LIMITED -

		Document No.
ACN (Australian Company Number):	657 976 086	
ABN:	55 657 976 086	
Current Name:	SUPA ENERGY PTY LIMITED	
Registered in:	Victoria	
Registration Date:	11/03/2022	
Review Date:	11/03/2026	
Company Bounded By:		

- Current Organisation Details -

Name:	SUPA ENERGY PTY LIMITED	031412434
Name Start Date:	31/03/2022	
Status:	Registered	
Type:	Australian Proprietary Company	
Class:	Limited By Shares	
Sub Class:	Proprietary Company	

- Company Addresses -

<u>Registered Office</u>		9EAB00656
Address:	LEVEL 4 SUITE 2 101 MORAY STREET SOUTH MELBOURNE VIC 3205	
Start Date:	24/05/2024	
<u>Principal Place of Business</u>		9EAB00656
Address:	LEVEL 4 SUITE 2 101 MORAY STREET SOUTH MELBOURNE VIC 3205	
Start Date:	17/05/2024	

- Company Officers -

Note:

A date or address shown as UNKNOWN has not been updated since ASIC took over the records in 1991. For details, order the appropriate historical state or territory documents, available in microfiche or paper format.

* Check documents listed under ASIC Documents Received for recent changes.

Director

Name: GEOFFREY ROBERT HORTH 5EFR37665
Address: [REDACTED]
Birth Details: [REDACTED]
Appointment Date: 11/03/2022
Cease Date:

Name: JEREMY MICHAEL LARKIN 9EAA88130
Address: [REDACTED]
Birth Details: [REDACTED]
Appointment Date: 29/08/2023
Cease Date:

Name: DANIELA MONICA WEGNER 9EAA88130
Address: [REDACTED]
Birth Details: [REDACTED]
Appointment Date: 29/08/2023
Cease Date:

Name: SIMON MARTIN 7ECV89039
Address: [REDACTED]
Birth Details: [REDACTED]
Appointment Date: 27/06/2024
Cease Date:

Secretary

Name: DRISHA KIM NATARAJAN 7ECX99511
Address: [REDACTED]
Birth Details: [REDACTED]
Appointment Date: 29/08/2024
Cease Date:

Ultimate Holding Company

Name: 654 447 168 SMART URBAN PROPERTIES AUSTRALIA PTY LTD 5EFR37665
Address:
Appointment Date:
Cease Date:
Abn: 33 654 447 168

- Share Structure -

Current

Class: ORDINARY SHARES
Number of Shares Issued: 100
Total Amount Paid / Taken to be Paid: \$100.00
Total Amount Due and Payable: \$0.00

5EFR37665

Note:

For each class of shares issued by a company, ASIC records the details of the twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

- Share/Interest Holding -

Current

- Holding -

Class:	ORD	Number Held:	100	5EFR37665
Beneficially Owned:	Yes	Fully Paid:	Yes	

- Members -

Name: SMART URBAN PROPERTIES AUSTRALIA PTY LTD
ACN: 654 447 168
Address: 35 BANK STREET SOUTH MELBOURNE VIC 3205
Joint Holding: No
Abn: 33 654 447 168

- External Administration Documents -

There are no external administration documents held for this organisation.

- Charges -

There are no charges held for this organisation.

Notes:

On 30 January 2012, the Personal Property Securities Register (PPS Register) commenced. At that time ASIC transferred all details of current charges to the PPS Registrar. ASIC can only provide details of satisfied charges prior to that date. Details of current charges, or charge satisfied since 30 January 2012 can be found on the PPS Register, www.ppsr.gov.au. InfoTrack may cap documents for on-file searches to 250.

- Document List -

Notes:

- * Documents already listed under Registered Charges are not repeated here.
- * Data from Documents with no Date Processed are not included in this Extract.
- * Documents with '0' pages have not yet been imaged and are not available via DOCIMAGE. Imaging takes approximately 2 weeks from date of lodgement.
- * The document list for a current/historical extract will be limited unless you requested ALL documents for this extract.
- * In certain circumstances documents may be capped at 250.

Form Type	Date Received	Date Processed	No. Pages	Effective Date	Document No.
484	02/07/2025	02/07/2025	2	02/07/2025	7EDN12573
484E	Change to Company Details Appointment or Cessation of A Company Officeholder				
484	12/02/2025	12/02/2025	2	12/02/2025	7EDF99786
484E	Change to Company Details Appointment or Cessation of A Company Officeholder				
484	02/12/2024	02/12/2024	2	02/12/2024	7EDD40727
484E	Change to Company Details Appointment or Cessation of A Company Officeholder				
484	06/09/2024	06/09/2024	2	06/09/2024	7ECX99511
484E	Change to Company Details Appointment or Cessation of A Company Officeholder				
484	23/07/2024	23/07/2024	2	23/07/2024	7ECV89039
484E	Change to Company Details Appointment or Cessation of A Company Officeholder				
484	17/05/2024	17/05/2024	2	17/05/2024	9EAB00656
484	Change to Company Details				
484B	Change of Registered Address				
484C	Change of Principal Place of Business (Address)				
484	31/08/2023	31/08/2023	3	31/08/2023	9EAA88130
484E	Change to Company Details Appointment or Cessation of A Company Officeholder				
484	06/07/2022	06/07/2022	2	06/07/2022	7EBU15016
484E	Change to Company Details Appointment or Cessation of A Company Officeholder				
205	31/03/2022	31/03/2022	5	28/03/2022	031412434
205A	Notification of Resolution Changing Company Name				
201	11/03/2022	11/03/2022	3	11/03/2022	5EFR37665
201	Application For Registration As				
201C	A Proprietary Company				
201D	Name Not Specified in Application				

- Company Contact Addresses -

- Contact Address for ASIC use only

Address: 101 MORAY STREET SOUTH MELBOURNE VIC 3205

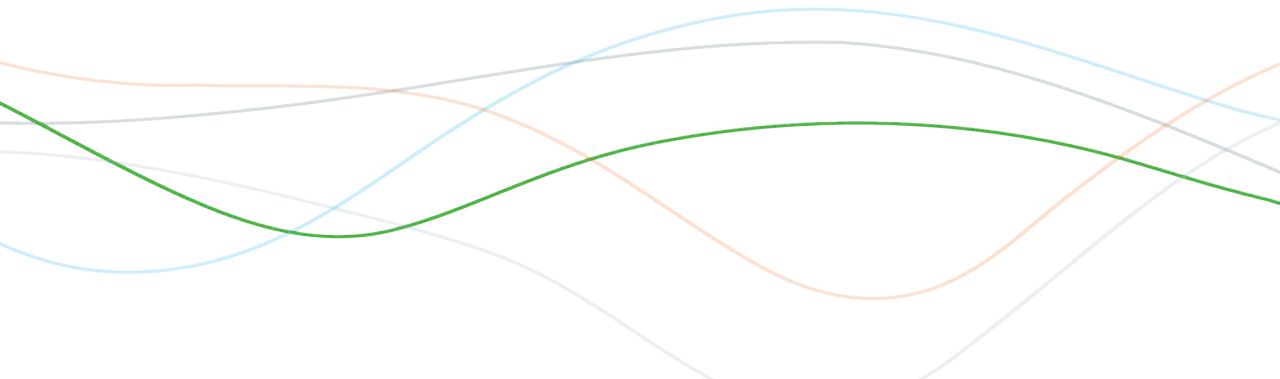
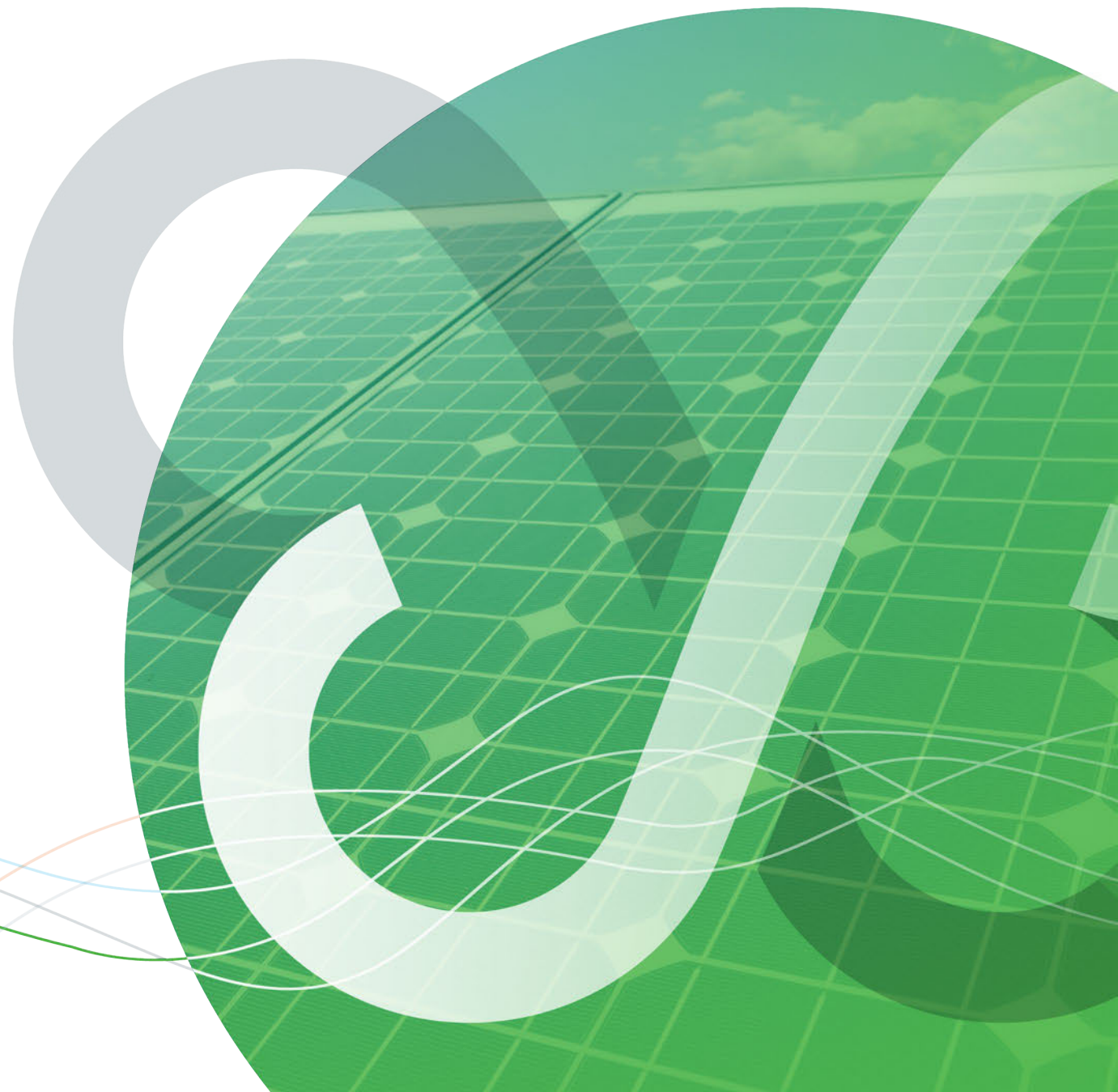
Start Date: 18/07/2024

*** End of Document ***



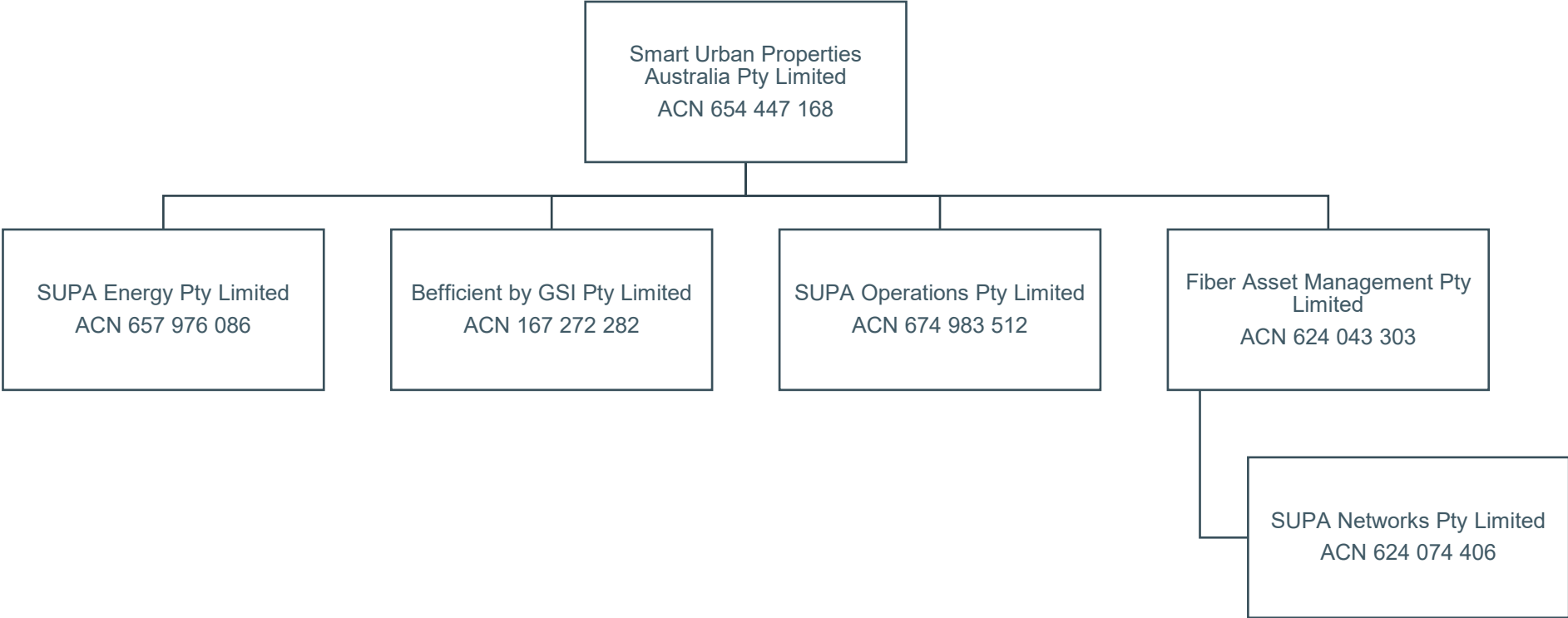
Corporate Structure

DECEMBER 2025



Corporate Structure

Legal entities





Compliance Policy

SUPA ENERGY PTY LTD



Table of Contents

1. Introduction	3
2. Purpose of the Compliance Policy.....	3
3. Nature of the Compliance policy.....	4
4. Responsibilities	4
5. Commitment to Compliance	5
6. Resources.....	5
7. Compliance Personnel.....	5
8. External Consultants.....	6
9. Software.....	6
10. Documentation.....	6
11. Obligations Register.....	7
12. Compliance Risk Assessment	7
13. Training and Assessment	8
14. Employing Qualified Staff.....	9
15. Monitoring Performance.....	9
16. Remedial Action and Controls	10
17. Provision of Updates and Advice.....	10
18. Review	11
19. Publication	11
Schedule A: Email to staff introducing the Regulatory Reporting Tool	12
Version Control.....	13

1. Introduction

- 1.1. Businesses that aim to be successful in the long-term need to maintain a culture of integrity and compliance. Compliance is achieved by a systematic approach to the identification, management, and implementation of regulatory obligations supported by top level leadership.
- 1.2. This is the Compliance Policy of SUPA Energy and it sets out the compliance management system ('CMS') that will be used by SUPA Energy to ensure compliance with all applicable legislation, regulations, licence conditions, codes, guidelines, rules, and standards that impact (or have the potential to impact) SUPA Energy's operations ('Regulatory Obligations').
- 1.3. SUPA Energy is committed to an effective compliance management system designed in accordance with Compliance Standard 37301:2023 (Compliance Management Systems).
- 1.4. SUPA Energy's CMS is modelled on the following schematic:

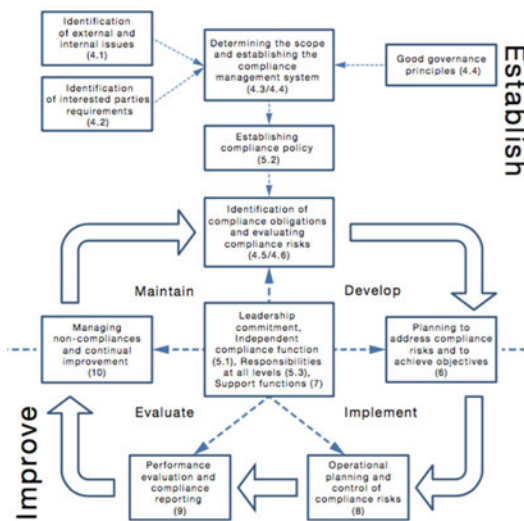


Figure 1 — Flowchart of a compliance management system

Figure 1: Flowchart of a Compliance Management System

2. Purpose of the Compliance Policy

- 2.1. The policy's primary purpose is to define the expectations of the business in the implementation of a CMS.
- 2.2. Our CMS is designed to ensure compliance with Regulatory Obligations that impact, or have the potential to impact, SUPA Energy's operations.
- 2.3. SUPA Energy's obligations include those under Energy Law (such as the National Energy Retail Law, the National Energy Retail Regulations, and state derogations), Network Exemption Guideline, Energy Retail Code of Practice (Vic), Electricity Industry Act 2000 (Vic), Gas Industry Act 2001 (Vic), General Exemption Order 2022 (Vic), the *Telecommunications Act 1997*, the *Do Not Call Register Act 2006* and the

Australian Consumer Law (as set out in Schedule 2 to the *Competition and Consumer Act 2010*).

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

3. Nature of the Compliance policy

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

4. Responsibilities

- 4.1. The board has overall responsibility for the policy and the CMS which includes selecting and overseeing the corporate governance and compliance strategies that are carried out, on a day-to-day basis, by the Compliance Committee.
- 4.2. A Compliance Committee will be formed by the Board, which committee 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 following :
- Geoff Horth – Group CEO and Board Member
 - Rodney Mills – Group CFO
 - Henry Liddell – Head of Operations
 - Drisha Natarajan – Group General Counsel, Head of Legal and Compliance
- The Compliance Committee must always include a member of the Board and must include the Head of Legal and Compliance.
- 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 SUPA Energy, through its employees and contractors, complies with these obligations;
 - 4.5.3. Gathering information to investigate and resolve potential compliance breaches;

- 4.5.4. Reporting potential compliance breaches to the compliance committee, Board and the Australian Energy Regulator ('AER'), and the Essential Services Commission of Victoria ('ESCV') (if applicable) in accordance with SUPA Energy's CMS;
- 4.5.5. Directing the Head of Legal and Compliance to conduct compliance risk assessments as required, including audits, reviews and remediation.
- 4.6 The Board owns this Compliance Policy and the CMS developed and implemented by the Compliance Committee.
- 4.7 The Head of Legal and Compliance 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. SUPA Energy's staff are required to comply with all industry regulations as a condition of employment.
- 5.2. To ensure staff compliance, training programs will be instituted on induction and in an ongoing manner to ensure that staff are aware of their obligations and are notified of any changes to these requirements.
- 5.3. External contracts with strategic partners and contractors also require compliance with applicable laws and regulations.
- 5.4. SUPA Energy also recognises the importance of ensuring compliance when dealing with stakeholders, which include customers, regulators, government bodies, non-profit and community organisations and the wider community.
- 5.5. SUPA Energy has a sharp focus on compliance and risk-assessment. This, together with its commitment to excellence, is what distinguishes SUPA Energy in the industry.
- 5.6. SUPA Energy is committed to ensuring that all staff, from the top down, operate within a compliance culture at all times.

6. Resources

- 6.1. To ensure compliance with all Applicable Law, SUPA Energy will provide adequate resources which will be allocated as the need arises.
- 6.2. Resources currently used by SUPA Energy include those described below.

7. Compliance Personnel

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

- 7.1.1. 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 SUPA Energy 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 or Board meetings, as appropriate.

8. External Consultants

- 8.1. As part of its CMS, SUPA Energy regularly obtains advice on compliance and legal issues from various external consultants including law firms, financial advisors and compliance professionals.
- 8.2. In addition, SUPA Energy will procure at three-yearly intervals a third party audit of its compliance policy and CMS and conduct annual reviews of its legislative compliance. Outcomes are to be incorporated into SUPA Energy's compliance policy, CMS, and compliance training program.

9. Software

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

10. Documentation

- 10.1. SUPA Energy has developed documents, procedures and policies related to operational processes in order to ensure statutory compliance. These documents are provided to employees to ensure implementation of practices that are in accordance with the prescribed regulations.
- 10.2. SUPA Energy's on boarding system includes the provision to new staff of all current policies, procedures and training which form part of the policy and the CMS.
- 10.3. Whenever a document has been changed or updated, SUPA Energy will circulate the new document to all staff together with training where necessary.

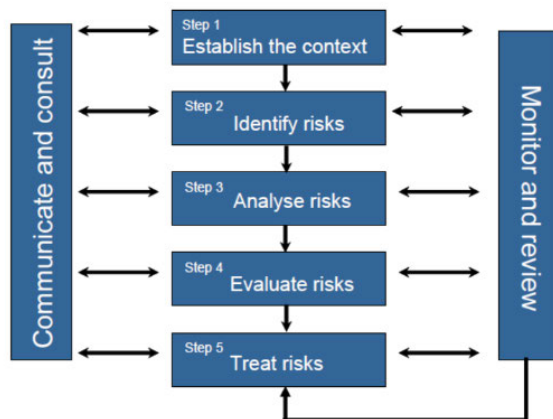
11. Obligations Register

- 11.1. Relevant Australian standards state that organisations should systematically identify compliance obligations and the implications for its activities, products and services. The extent to which an organisation documents its compliance obligations should be appropriate to its size, complexity, structure and operations.
- 11.2. The Obligations Register employed by SUPA Energy is the Obligations Register Application (**ORA**) developed by Compliance Quarter. The ORA is an online tool that allows the business to quickly identify applicable regulatory obligations. The ORA is available here
- 11.3. SUPA Energy operates in a highly regulated environment. The Head of Legal and Compliance is responsible for identifying all relevant compliance obligations and publishing them in the Obligations Register.
- 11.4. The Obligations Register will be updated on the basis of changes to laws and other compliance obligations. This will be achieved by;
 - 11.4.1. being on the mailing list of relevant regulators;
 - 11.4.2. maintaining membership of industry bodies;
 - 11.4.3. subscribing to relevant information services;
 - 11.4.4. attending industry forums and seminars;
 - 11.4.5. monitoring the website of regulators' and
 - 11.4.6. monitoring proposed regulation and decisions of courts and tribunals.

12. Compliance Risk Assessment

- 12.1. Risk assessments are conducted in accordance with the relevant standards using the following methodology: *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 SUPA Energy
 - 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



Source: Chartered Secretaries of Australia

- 12.5 As a function of the Head of Legal and Compliance’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, SUPA Energy 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 SUPA Energy’s operations.
- 13.2. Business Unit Managers provide training opportunities to their staff to address initial, continual and unique requirements.
- 13.3. Such training is to be developed by the Head of Legal and Compliance, 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. SUPA Energy will ensure that all staff have the qualifications and experience necessary to be competent in their roles and the commitment to function in compliance with all applicable laws. For example, employees working in legal or compliance areas must have, as a minimum, a Bachelor 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. SUPA Energy will develop performance and compliance criteria based on the requirements and definitions provided by the regulators.
- 15.2. SUPA Energy will develop performance and compliance criteria based on the requirements and definitions provided by applicable regulators.
- 15.3. In the avoidance of doubt, any potential breaches are reported upon, irrespective of risk rating.
- 15.4. SUPA Energy will implement reporting procedures (and, where authorised by applicable law, anonymous reporting) for actual or suspected breaches of applicable law.
- 15.5. All staff must use the Regulatory Reporting Tool (online here) (see Schedule A for introductory email), and must provide a complete description of the breach, including suspected potential breaches, and any corrective action to date. Submissions using the Regulatory Reporting Tool must be actioned by the Head of Legal and Compliance.
- 15.6. SUPA Energy will implement appropriate procedures for investigating any such report and providing related reports to Management or the Board, as appropriate.
- 15.7. Specifically, all staff are required to report actual or suspected compliance breaches to the Head of Legal and Compliance, who will, upon investigation, escalate confirmed breaches to Management.
- 15.8. Management in consultation with the Head of Legal and Compliance, 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, SUPA Energy has an obligation to report on the number and categories of complaints received to the relevant jurisdictional regulators as set out in the AER's Compliance Procedures and Guidelines and the Essential Service Commissions' ('ESC') Compliance and Performance Reporting Guideline.
- 15.11. Reports prepared pursuant to the AER's Compliance Procedures and Guidelines and the ESC's Compliance and Performance Reporting Guideline will be reviewed by the Head of Legal and Compliance. The Head of Legal and Compliance may develop recommendations to Management resulting from such review including, for example, to strengthen compliance controls in relation to a specific area identified within a complaint.

16. Remedial Action and Controls

- 16.1. Remedial actions taken in response to individual incidents, including compliance breaches, will be recorded and reported in the compliance reporting software. Remedial actions taken in response to systemic or serious breaches will be reported to the Board, as determined by Management, in consultation with the Head of Legal and Compliance.
- 16.2. In consultation with the compliance committee, the Head of Legal and Compliance 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 SUPA Energy has the obligation for compliance, it assumes ultimate responsibility.
- 16.4. The Head of Legal and Compliance will review existing controls on an ongoing basis to ensure their continuing effectiveness and relevance.

17. Provision of Updates and Advice

- 17.1. The Head of Legal and Compliance 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. SUPA Energy subscribes to a number of regulatory newsfeeds, including those offered by third parties. These third parties include law firms, SAI global, and the regulators themselves.
- 17.3. SUPA Energy's staff will play an active role in the development of new compliance obligations by attending and participating in industry events and consultations conducted by regulators and reviewing, at reasonable intervals, on-line information on

regulations and their currency. The aim of this participation is to contribute to an improved regulatory environment for the company and beneficial outcomes for consumers and the community.

18. Review

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

19. Publication

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

Schedule A: Email to staff introducing the Regulatory Reporting Tool

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

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

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

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

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

Version Control

This process will be reviewed and updated on an annual basis or when there are changes in the relevant laws and rules. The version control will be handled by the Compliance Committee, with a clear record of changes made, the reason for changes, and the date of changes.

Version: 1.1

Last Review: 19 November 2025

Next Review: 19 November 2026

Changes Made: N/A

Reason for Changes: N/A

Version	Amendment	Date
Version 1	N/A	19 November 2024
Version 1.1	N/A	19 November 2025

Privacy Policy

The regulatory framework

The Australian Privacy Principles (Principles) contained in the Privacy Act 1988 (Privacy Act). The Principles are designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is managed.

Smart Urban Properties Australia Pty Ltd and its subsidiaries (collectively referred to as SUPA) are committed to managing personal information in accordance with the Principles and Privacy Act. This document sets out our policies for managing personal information and is referred to as our Privacy Policy.

About SUPA

SUPA comprises a number of divisions and we offer services in embedded networks, energy, fiber networks, security, smart homes and property management platforms.

Collection of personal information

When you enquire about our services or when you become a client of SUPA, a record is made which includes your personal information.

The types of personal information that we collect will vary depending on the circumstances of collection.

The types of personal information that we collect may include information about:

- Customers full legal names, email, postal address and other contract details.
- Credit card details
- Pet and vehicle licence plate details
- Login details (username and password)
- App usage data
- Tracking and cookies data
- In relation to prospective employee or employees we collect personal details and contact information, qualifications, work history, tax file number and superannuation.
- personal contacts with other corporate clients or suppliers
- any other personal information you provide to us, or authorize us to collect as part of your interaction with SUPA.

The types of personal information (including historical information) we collect for account management include your name, contact details, identification information, organisation, positions held, information in forms you submit,

payment details and enquiry/complaint details. We also collect metering data and personal information about your interactions and transactions with us, including any contact we have with you by telephone, email or online.

We may collect your health information or organisational affiliation to determine your eligibility for specific discounts, services or treatment (e.g. concessions, life support or hardship). We will confirm that you have consented prior to collecting, using or disclosing your sensitive information, unless the collection of the information is required or authorised by law. Sensitive information is information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, genetics, biometrics or health.

Some personal information is collected under laws including a range of energy industry laws applicable to us. For example, we are required to record information we are provided about customers on life support as these customers have a special need for continuity in their power supply.

This information is collected in a variety of ways, including by way of personal contact such as business activities and events. Also mail, telephone, email and online. Except where indicated our websites do not provide systems for secure transmission across the internet. We may monitor and record your communications with us (including email and telephone).

We may also collect and use personal information available from other public sources such as telephone listings, and from other third-party sources including where it is necessary to identify customers. For example, builders and real estate agents may provide details of new occupants and tenants who are using gas and/or electricity.

Where you provide us with personal information about someone else you must have first obtained their consent to provide their personal information to us based on this Privacy Policy.

Recording and images

In some circumstances we may take images or audio-visual recordings which identify you. This usually occurs when you participate in an event we are managing or delivering.

Use and disclosure of personal information

SUPA collects personal information reasonably necessary to carry out our business, to assess and manage our client's needs, and provider services offered by SUPA. We may also collect information to fulfil administrative functions associated with these services .

For our normal business dealings, SUPA may use or disclose personal information for the following no exhaustive purposes:

- provide our products and services to customers including customer care and support and detecting, preventing and addressing technical issues;
- to understand you and meet any personal requirements.
- process payments and refunds;
- verify your identity and personal information;
- maintain and update our records and to carry out other administrative tasks;
- communicate and manage our relationship with you and your organisation;
- help manage and enhance our products and services, including monitoring usage of our products and services, conducting surveys and other research;

- deal with your applications, enquiries and concerns;
- prevent, detect, investigate and deal with unlawful activity and misconduct (whether actual or suspected); and
- comply with legal obligations and protect our lawful interests.

We may not be able to do these things without your personal information.

We may also use and disclose your personal information in connection with acquisitions or potential acquisitions of our business.

We also use your personal information to promote and market products and services to you, including through telephone and electronic methods such as email, SMS, websites and mobile apps. This is to keep you informed of products, services and special offers and may continue after you cease to acquire services from us.

We may exchange personal information with:

1. cloud services. Your login information to our platforms may be transferred to and maintained on third party cloud services which operate outside of Australia where data protection laws may differ.
2. service providers and specialist advisers who have been contracted to provide installation and maintenance, meter maintenance and reading, administrative, financial, research, archival, auditing, accounting, customer contact, sales, legal, business consulting, banking, payment, credit management, debt collection, delivery, data processing, data analysis, information broking, research, marketing, investigation, website, technology or other services;
3. other energy retailers for example in connection with migrating your services or where we are a service provider to them;
4. the Australian Energy Market Operator (AEMO) which manages energy supply, demand and capacity in accordance with applicable regulation;
5. the Australian Energy Regulator (AER) which manages auditing and compliance requirements for network exemption applications and approved holders with regard to customer informed consent in accordance with applicable regulation guidelines,
6. insurers, lawyers, courts, tribunals and regulatory authorities (including the Australian Tax Office) as required or authorised by law or in accordance with their reasonable information requests;
7. insurance investigators; or
8. any escalated dispute resolution body authorised on your behalf
9. your representatives and anyone else authorised by you, as specified by you or the contract.

Management of personal information

We understand that your personal information may change frequently with changes of address and any personal circumstances. You can help us to ensure that your personal information we hold about you is accurate and up-to-date. Please contact us promptly by a method set out in Section 7 of this Policy to inform us of any changes to that may occur to your personal information.

We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers. We have implemented a range of measures to protect the security of that personal information. We are also required by law to take reasonable steps to destroy or de-identify personal information when no longer needed for any permitted purpose in our day to day business operations.

Accessing and correcting your personal information

Under the Principles, you may have the right to obtain access to personal information which we hold about you and to advise us of any perceived inaccuracy. We will consider any recommendation by you to change or correct information and advise you of the action taken.

You may also request to access your personal information by contacting us by a method set out in Section 7 of this Policy. Depending upon the personal information you seek, you may be asked:

- to complete an Information Request Form
- to verify your identity in writing, and/or
- if the inquiry involves extensive administration time or resources, to pay a fee. If this is the case, we will advise the likely cost in advance and can help refine your request if required.

Please note that in circumstances prescribed by the Privacy Act, you may be refused access to or correction of your personal information (for example, if providing access would be unlawful or would have an unreasonable impact upon the privacy of other individuals). In these circumstances we are required to provide you our reasons and if you request, make a note of your requested correction with the relevant information.

Complaints about an interference with privacy

If you consider that any action taken by SUPA breaches this Privacy Policy or the Principles, you can make a complaint by contacting us by a method set out in Section 7 of this Policy. We will endeavour to act promptly in response to any complaint. More details about our complaints process generally are set out in the [Complaints and Dispute Resolution Policy](#). If your privacy concerns are not resolved to your satisfaction, you may contact your relevant energy industry ombudsman within your jurisdiction to handle privacy complaints, including:

- For energy related issues -[Energy and Water Ombudsman Victoria on 1800 500 509](#) ,[Energy and Water Ombudsman SA on 1800 665 565](#) , [Energy and Water Ombudsman NSW on 1800 246 545](#) , [Energy and Water Ombudsman Western Australia on 1800 754 004](#)
- For all other services , [The Office of the Australian Information Commissioner on 1300 363 992](#)

How to Contact us

You can contact SUPA about a privacy-related issue by emailing us at privacy@supau.au.

Version Control

This process will be reviewed and updated on an annual basis or when there are changes in the relevant laws and rules. The version control will be handled by the Legal Department, with a clear record of changes made, the reason for changes, and the date of changes.

Version: 1.0

Last Review: 23 July 2024

Next Review: 23 July 2025

Changes Made: N/A

Reason for Changes: N/A

Version	Amendment	Author and date
Version 1	Initial draftN/A	23 July 2024



SUPA acknowledges the Traditional Custodians of the Lands on which we operate throughout Australia, and recognise their continuing connection to the land, waters and culture. We pay our respects to them and to Elders, past, present and emerging.





Third Party Management Policy

SUPA ENERGY PTY LTD



Table of Contents

- 1. Introduction 3
- 2. Third party risk management plan 4
- 3. Selection of third-party suppliers 5
- 4. Identification of compliance issues 6
- 5. Notification of a compliance breach 7
- 6. Review of third-party vendor procedures 8
- 7. Ongoing monitoring 9
- 8. Documentation and reporting 10
- Annexure A: Third Party Vendor Management Plan 11
 - 1. Third party risk management process 11
 - 2. Planning 11
 - 3. Due diligence 12
 - 4. Contract negotiations 12
 - 5. Ongoing monitoring 13
 - 6. Termination 13
 - 7. Documentation and reporting 13
- Version Control 14

1. Introduction

- 1.1. SUPA Energy Pty Ltd (**SUPA Energy**) owns and operates embedded networks in NSW, Queensland, South Australia and Victoria.
- 1.2. SUPA Energy relies on selected third-parties in its business operations.
- 1.3. SUPA Energy wants to ensure that all third-party vendors engaged to provide services are aware of, and comply with, SUPA Energy's obligations.

2. Third party risk management plan

- 2.1. SUPA Energy has implemented a third-party risk management plan which is contained in Annexure A.
- 2.2. The purpose of the plan is to ensure that before entering 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. SUPA Energy will engage with third-parties from time to time for reasons including: to supplement its internal resourcing, to fill any gaps in existing capability, to leverage external experience.
- 3.2. In selecting third-parties, SUPA Energy will first identify the need and define it, then determine what attributes or experience is required from a third-party and then look for suitable third-parties to fulfil the need identified.
- 3.3. In selecting third-parties, SUPA Energy will conduct due diligence as further described below.

4. Identification of compliance issues

- 4.1. All third-party vendors will be required to notify SUPA Energy's Head of Legal and Compliance of any compliance breaches which occur in the course of providing services.
- 4.2. The Head of Legal and Compliance 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 Head of Legal and Compliance 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 Head of Legal and Compliance 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 Head of Legal and Compliance will take all necessary steps to notify the regulatory authority.
- 5.3. The Head of Legal and Compliance will arrange a meeting of the Compliance Committee to consider the breach and what remedial action should be taken.
- 5.4. The Compliance Committee will prepare a report for the board which details the circumstances of the breach and what remedial steps are required. This may include seeking legal advice as to whether the third-party vendor contract should be terminated.
- 5.5. The Head of Legal and Compliance 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 Head of Legal and Compliance will be responsible for ensuring that the relevant course of action is undertaken.
- 5.8. The Head of Legal and Compliance 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 Head of Legal and Compliance 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 Head of Legal and Compliance will be required to report to SUPA Energy's board that this process has been undertaken and when it is completed.

7. Ongoing monitoring

- 7.1. The Head of Legal and Compliance 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 Head of Legal and Compliance will be required to conduct spot audits to ensure that the compliance policies are being adhered to.

8. Documentation and reporting

- 8.1. The Head of Legal and Compliance 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 Head of Legal and Compliance and a report presented to SUPA Energy's board.

Annexure A: Third Party Vendor Management Plan

1. Third party risk management process

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

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

3. Due diligence

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

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

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

4. Contract negotiations

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

4.2 The contract should address the following:

- nature and scope of the arrangement;
- regular compliance monitoring;
- performance measures or benchmarks;
- responsibilities for providing, receiving and retaining information;
- responsibility for compliance with applicable laws and regulations;
- confidentiality;
- dispute resolution;
- limits on liability;
- default and termination;

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

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

5. Ongoing monitoring

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

6. Termination

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

7. Documentation and reporting

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

Version Control

This process will be reviewed and updated on an annual basis or when there are changes in the relevant laws and rules. The version control will be handled by the Legal Department, with a clear record of changes made, the reason for changes, and the date of changes.

Version: 1.1

Last Review: 12 February 2026

Next Review: 12 February 2027

Changes Made: N/A

Reason for Changes: N/A

Version	Amendment	date
Version 1	N/A	22 Nov 2024
Version 1.1	N/A	12 February 2026

-



Complaints and Dispute Resolution Procedure

SUPA ENERGY PTY LTD



Table of Contents

1.	What is this document?	2
2.	What is a complaint?	2
3.	What do we commit to do?	3
4.	How will we manage complaints?	3
5.	Internal and External Escalation.....	5
6.	Responsibilities.....	5
7.	Monitoring and Improving	6
8.	Promoting our Complaints Management Program.....	6
9.	Customer Read Estimates.....	6
10.	Contact Us to Lodge a Complaint	6
11.	Contact details for the Energy Ombudsman Schemes	7
	Version Control	9

1. What is this document?

- 1.1. Everybody has the right to complain. We are committed to promptly acknowledging, assessing, and resolving complaints efficiently in an impartial and unbiased manner. This document sets out our procedures for accepting, recording, and resolving complaints.
- 1.2. Through this document, we make the commitment to addressing issues raised within complaints within a reasonable timeframe, adopting a people focused and proactive approach, and to continual quality improvement. We will review complaints on an ongoing basis to identify any potential non-compliance and areas for improvement. We aim to minimise the possibility of complaints escalating into ongoing disputes.

2. What is a complaint?

- 2.1. A complaint is an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. Where it is not clear if feedback or a general concern is intended to be handled as a complaint, where appropriate, we will seek clarification.
- 2.2. Complaints may be lodged without contact information and where it appears that the complainant wants to remain anonymous, we will, to the extent reasonably practicable, not request the complainant's active involvement in the management of the complaint.
- 2.3. We will consider all complaints as opportunities to improve, and they will be freely received by telephone, in writing (for example, letter, email, or in person).
- 2.4. Complaints may be raised in relation to (amongst other areas), any:
 - a) Failure by us to observe our published or agreed practices or procedures;
 - b) Failure in respect of a product or service offered or provided by us or our representatives;
 - c) 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
 - d) An occurrence where a complaint is directed to us your behalf by an energy ombudsman.
- 2.5. Our organisation takes a proactive stance on managing complaints efficiently and professionally. We ensure that our approach to handling complaints is thorough and fair, rooted in a culture of prompt and unbiased resolution.
- 2.6. We commit to:
 - a) Actively support the handling of complaints at all levels of leadership;
 - b) Establish clear policies and procedures for managing complaints effectively;
 - c) Hold our management accountable for creating a welcoming environment for feedback and complaints;
 - d) Allocate the necessary resources, including training and support, for our staff to manage complaints effectively; and
 - e) Provide assistance to those who may find it difficult to navigate the complaint process.

By doing so, we aim to address and resolve complaints promptly, preventing them from escalating, and to continuously improve our processes based on the feedback received.

3. What do we commit to do?

- 3.1. In all instances, we will:
- a) Treat you with respect;
 - b) Take your complaint seriously;
 - c) Respect your privacy;
 - d) Manage your complaint with impartiality;
 - e) Properly investigate and report on your complaint;
 - f) Resolve your complaint with proper consideration to facts;
 - g) Provide the option of internal escalation or a referral to an energy ombudsman scheme when requested or appropriate; and
 - h) Ensure equal access to our complaints management program and fair resolutions.
- 11.2. You have rights under various laws, including the Competition and Consumer Act 2010 (Cth), and the Energy Law. We will ensure that those rights are respected.

4. How will we manage complaints?

- 4.1. We will follow the guiding principles contained in AS/ISO 10002-2022 (Guidelines for Complaints Handling in Organisations).
- 4.2. Once a complaint has been received, one of our personnel will acknowledge the complaint and prioritise it for resolution. We will respond and acknowledge receipt of each complaint within three (3) business days. However, 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.
- 4.3. 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:
- a) Your requested resolution
 - b) The date of your complaint
 - c) A description of your complaint
 - d) The expected date for a response or resolution
 - e) The established priority of your complaint
- 4.4. More than one complaint can be made per customer/call. For example, if a customer makes a billing complaint and then makes a marketing complaint during the same call, two complaints will be recorded. Each individual customer contact with a complaint will be recorded and categorised as one, irrespective of the number of times a caller has contacted us on an issue.

-
- 4.5. Complaints will be tracked from the time they are received to their resolution. When tracking the resolution of complaints, we will make sure to meet response deadlines. We will keep you informed and updated regularly throughout the process.
- 4.6. We are committed to resolving all complaints effectively and promptly. Tailored solutions will be offered for each case, ensuring they fit the specific issues raised.
- 4.7. Keeping the complainant informed is crucial, especially if there are delays. After resolving the complaint, we'll communicate:
- a) What we did in response to the complaint.
 - b) The outcome.
 - c) Why we made certain decisions.
 - d) Any offered solutions or next steps.
 - e) Other options the complainant might pursue, like internal or external review.
 - f) Communication should be comprehensive, focusing on our organisation's actions and their impact on the complainant. If a complaint involves a staff member, we'll handle the information sensitively, respecting privacy.
- 4.8. When closing a complaint, we'll document:
- a) Actions taken to resolve the issue.
 - b) The final outcome.
 - c) Any further steps we need to take.
- This helps us with any future reviews and contributes to our continuous improvement.
- 4.9. We'll make sure that any changes we've agreed upon are put into action and tracked. The complaints manager or a senior team member will oversee this.
- 4.11. In all instances, we will
- a) Freely accept complaints lodged on our website, in person, or by telephone, email, or letter;
 - b) Acknowledge any complaint received as soon as possible and generally no later than three business days of receipt;
 - c) Confirm the next steps including the complaint process, expected timeframes, your involvement, and the possible or likely outcomes of the complaint, where practicable;
 - d) Begin an investigation into the reasons for a complaint within 24 hours of acknowledgment;
 - e) Keep you updated about the investigation and any proposed resolution;
 - f) Notify you as soon as possible of the outcome of our investigation and any proposed resolution; and
 - g) Provide you with the option of an internal review of your complaint if you are unsatisfied with the outcome of the investigation or the proposed resolution.

5. Internal and External Escalation

- 10.1. There are three levels of escalation of complaints. First, most complaints will be managed by front line staff. At any time, you may request an internal escalation of your complaint, which will be granted. Complaints will also be escalated where they are complex, urgent, or sensitive. When your complaint is received, you will be informed that you have the right to escalate it if you are dissatisfied with the process. Individual staff who manage complaints will be required to review the complexity, urgency, and sensitivity of all complaints and seek assistance from a supervisor or specialist where required.
- 10.2. If you are not satisfied with our response to your complaint or you wish to seek independent advice about a complaint, we will notify you that you can contact the Energy Ombudsman in your State.
- 10.3. We will provide the contact details for the Energy Ombudsman schemes and will assist you in lodging a complaint with them. [\[OEB\]](#)

6. Responsibilities

- 6.1. All of our staff must comply with this procedure as well as the Electricity Industry Act, Energy Retail Code of Practice, Retail Law and Retail Rules and any Guidelines or Procedures published by the Australian Energy Regulator (AER) or the Australian Energy Market Operator (AEMO). Complaints can be made to any SUPA Energy employee or contractor. That employee or contractor is then required to report any complaints received to the Customer Service Manager.
- 6.2. All employees are required to comply with SUPA Energy's lawful direction and policies that are in place from time to time and this is a requirement set out in all employee's employment contract and statement position Top-level management of SUPA Energy is responsible for:
 - a) Establishing the complaints management program;
 - b) Establishing and implementing the process of complaints management;
 - c) Allocating resources to ensure compliance with obligations under applicable laws and this procedure;
 - d) Promoting and advocating a customer-centric approach to complaint resolution;
 - e) Reporting to the board on the management of complaints, including the number and nature of complaints received;
 - f) Continually reviewing the effectiveness of the complaints management program, including the program's processes; and
 - g) Establishing an adequate training program to ensure all relevant staff, agents, contractors, and other representatives comply with this procedure.

7. Monitoring and Improving

- 7.1. Complaints will be tracked at individual and group levels. Any systemic issues that are identified will be brought to the attention of the Compliance Committee and Board during their monthly meetings.
- 7.2. SUPA Energy's board will direct top-level management to address systemic issues that are identified during a complaint process.

8. Promoting our Complaints Management Program

- 8.1. We will publish this Standard Complaints and Dispute Resolution Procedure on our website, and it will be actively brought to the attention of customers.
- 8.2. We are committed to promoting and ensuring the visibility of our complaints management program. To achieve this, we will:
 - a) Make this procedure available free of charge;
 - b) Arrange for an interpreter to expound the procedures and facilitate the resolution of complaints;
 - c) Make special arrangements for people with disabilities, ensuring that they and their advocates have access to this procedure and are aided in the resolution of their complaint. This document will be provided in large print Braille or audiotape on request; and
 - d) Ensure that all relevant staff members are trained to resolve complaints and have access to resources for cross-cultural communication and communication with customers with special needs.

9. 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." You can find more information on customer read estimates at www.supaenergy.au.

- 9.1.. 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.
- 9.2. We will deal with complaints regarding customer read estimates in accordance with our standard complaints process, which is outlined in this procedure.

10. Contact Us to Lodge a Complaint

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

Our contact details:

Telephone: 1300 761 390

Email: support@supaenergy.au

www.supaenergy.au

Interpreter: 131 450 - For help using an interpreter, visit TIS.

NRS: 133 677 - For help using this service, visit NRS.

11. Contact details for the Energy Ombudsman Schemes

If you are not satisfied with our response or investigation into a complaint, you may contact the Energy Ombudsman in your state. We will provide you with the contact details of your Energy Ombudsman if needed.

Energy and Water Ombudsman of NSW

By Post: PO Box 1343, Haymarket NSW 1240.

Freepost: Reply Paid 86550, Sydney South NSW 1234.

Free call: 1800 246 545

Free fax: 1800 812 291

complaints@ewon.com.au

Interpreter: 131 450 - For help using an interpreter, visit TIS.

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

Energy and Water Ombudsman Queensland

Freecall: 1800 662 837

Translation services: 131 450 - For help using an interpreter, visit TIS.

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

Fax: (07) 3006 2670

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

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

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

Energy and Water Ombudsman South Australia

Freecall: 1800 665 565

National relay service: 133 677

Translating and interpreting service (TIS): 131 450

Post: GPO Box 2947 Adelaide SA 5001

Office address (strictly by appointment only): Level 11,
50 Pirie Street Adelaide SA 5000

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

Energy and Water Ombudsman Victoria

Freecall: 1800 500 509

Translating and interpreting service (TIS):131 450

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

Email: ewovinfo@ewov.com.au

Post: Reply Paid 469 Melbourne VIC 8060

Version Control

This procedure will be reviewed and updated on an annual basis or when there are changes in the relevant laws and rules. The version control will be handled by the Operations Department, with a clear record of changes made, the reason for changes, and the date of changes.

Version: 1.0

Last Review: 19 November 2025

Next Review: 19 November 2026

Changes Made: N/A

Reason for Changes: N/A



SUPA Energy

Family Violence Policy

Date 30/01/2026



1. Table of Contents

1. Policy Statement.....	3
2. Purpose.....	4
3. Publication and access.....	4
4. Scope	5
5. Your Rights.....	5
6. What we will do.....	6
7. Training.....	7
8. How we secure your account	8
9. What we will do about debts.....	9
10. Centrepay.....	10
11. What support is available.....	10
12. Supporting Documentation.....	11
13. External Support	11
14. If you have a complaint, question, or feedback.....	11
15. What external support is available	12
Version Control.....	14

1. Policy Statement

- 1.1. Our organisation recognises that family violence is a serious and widespread issue that affects the whole community.
- 1.2. We are committed to providing customers affected by family violence with confidential support and flexible payment arrangements to help manage their needs. The safety of affected customers is our primary concern in all our interactions and service delivery.
- 1.3. We are committed to making sure that this policy remains effective, up to date, and aligned with best practice. We will review this policy at least once every 12 months, or sooner if there are significant changes to legislation, regulatory guidelines, or customer needs.
- 1.4. To support continuous improvement, we will:
 - a. Collect internal data on the application of this policy (e.g. number of customers supported, referrals made, staff training completed)
 - b. Monitor feedback from affected customers and staff involved in delivering this policy
 - c. Conduct internal audits of our systems and procedures to ensure they are fit for purpose
 - d. Use this information to evaluate the effectiveness of the policy and identify any areas for improvement
- 1.5. The outcomes of these evaluations will inform future training, process updates, and refinements to this policy.
- 1.6. We have a number of resources set out in this Policy.

For immediate support, you can contact 1800 RESPECT on 1800 737 732. This is the National Sexual Assault, Domestic Violence Counselling Service 24-hour helpline.

If you require urgent help from the police, fire, or ambulance, call 000.

2. Purpose

- 2.1. Our objective as an energy retailer is to reduce the risk of harm to our customers who are experiencing or who have experienced family violence. We do this by:
 - a. Designing our systems and processes in a way that reduces the risk of harm;
 - b. Reducing the barriers to customers who are seeking help, assistance or information under this Policy;
 - c. Adopting the measures set out in this Policy; and
 - d. Demonstrating our commitment to support customers at all levels within our business, including from senior leadership.
- 2.2. The purpose of this policy is to:
 - a. Reduce the risk of harm to our customers experiencing family violence;
 - b. Provide safe, flexible and confidential support for customers affected by family violence; and
 - c. Demonstrate our commitment to addressing family violence at all levels of our business.
- 2.3. This policy applies to both current and former small customers of SUPA Energy who may be affected by family violence.

3. Publication and access

- 3.1. We can send you a copy of this policy if you would like us to. We will make sure this policy is easy to find on our website so that you can print it or read it online with a quick exit feature to ensure safe browsing. This policy is also available in large font, Easy English, screen-reader compatible formats, and can be translated into other languages if needed. Just let us know if you would like the policy in a different format or language.
- 3.2. We recognise that there are many forms of family violence. Family violence is any behaviour that occurs in family, domestic or intimate relationships that is physically or sexually abusive; emotionally or psychologically abusive; economically abusive; threatening or coercive; or is in any other way

controlling, that causes a person to live in fear for their safety or wellbeing or that of another person. Family violence is also defined as behaviour by any person that causes a child to hear or witness or otherwise be exposed to the effects of the above behaviour.

4. Scope

- 4.1. This policy applies to all current and former residential and small business customers who are impacted by family violence.

5. Your Rights

- 5.1. Our customers who are impacted by family violence have the following rights:
 - a. Receive support from our employees in a respectful and supportive manner.
 - b. Have your personal information handled securely, privately, and sensitively.
 - c. Choose a safe method of communication of your preference. We offer a variety of communication channels, such as email, phone, and secure messaging, to suit different needs and comfort levels.
 - d. Access information about external family violence support services. We will maintain an updated list of external family violence support services and make it easily accessible.
 - e. Appoint an authorised representative or a support person to act on your behalf. We will implement a secure verification process for authorised representatives to ensure they are legitimate.
 - f. Remove the joint account holders and, if needed, set up a new account in your name (if required). We will implement a simplified, expedited process for removing joint account holders and setting up new accounts.
 - g. Receive payment assistance support, including access to the assistance under our hardship policy. We won't charge you anything to change details on your account.

- h. Avoid the need to repeatedly disclose your circumstances and receive continuity of service. If you are comfortable with us doing so, we will assign you a dedicated contact and backup contact within our organisation. You can request a change to who your contacts are at any time.
- i. Account security options: we will implement additional account security measures as set out below. These are designed to keep your account safe.

6. What we will do

- 6.1. We will implement a robust and meaningful intersectional approach to our customer relationships which will include induction training, workplace resources, refresher training, and collecting client and staff feedback with the aim of continually improving.
- 6.2. We have systems and controls in place to effectively identify customers experiencing family violence and also internal processes to avoid an affected customer from having to repeat their situation during subsequent interactions providing for effective ongoing engagement. This includes implementing a secure process that: (a) enables staff to readily assess whether a customer may be an affected customer by reference to potential indicators of family violence; (b) flags affected customer accounts in our system so they are readily identifiable during subsequent contact; (c) restricts access to flagged accounts to designated trained staff on a need-to-know basis; and (d) assigns a dedicated contact person where requested by the customer.
- 6.3. We will manage all engagement with affected customers in a respectful, understanding, and sensitive manner.
- 6.4. We will handle information pertaining to customers affected by family violence securely and confidentially and restrict staff access to sensitive information.
- 6.5. We will ensure that customer consent is obtained before disclosing their personal information to a third party (unless required under law).
- 6.6. We will contact emergency services (police and/or ambulance) on request by the customer or if they believe further assistance is needed.

- 6.7. We will take your specific circumstances into account and discuss a safety plan with customers who have disclosed family violence to confirm and ensure the safety of the customer and their children
- 6.8. We will provide information regarding government support programs, including concessions and the availability of external family violence support services (see below)

7. Training

- 7.1. Ongoing training is provided to every person (including employees, agents and contractors) acting on our behalf who may engage with affected customers, managers of any person who may engage with affected customers and also anyone responsible for systems and processes that guide interactions with small customers.
- 7.2. The purpose of the training we provide is to ensure that we comply with this policy and our obligations under relevant law and to ensure that our customers are adequately supported and protected.
- 7.3. Training will cover:
 - a. the nature and consequences of family violence;
 - b. the application of this policy;
 - c. how to identify affected customers using the 'Recognise, Respond, Refer' model;
 - d. how to engage appropriately and effectively with affected customers, including when there is no direct disclosure of family violence;
 - e. the impact of intersectionality, and how factors such as culture, gender, disability, language, and financial dependence may shape a customer's experience of family violence;
 - f. how staff who are not family violence specialists can engage safely and respectfully;
 - g. available referral pathways to specialist support services; and
 - h. the importance of a flexible, customer-centred approach, including the use of non-judgemental and non-victim blaming language in all communications

- 7.4. Training materials will be reviewed and updated at least once a year to ensure they remain current and effective. Feedback from customers will be considered and incorporated where relevant to improve the training content and delivery.
- 7.5. The effectiveness of our training will be assessed on the basis of feedback from staff, and where appropriate third parties, and based on industry best practice and guidance materials published by regulatory and other industry bodies.

8. How we secure your account

- 8.1. Our organisation takes our obligations regarding all of our customer's personal information seriously and we manage this in accordance with the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles*.
- 8.2. We take various steps to secure your data including:
 - a. Restricting access to your accounts,
 - b. customer defined account security,
 - c. data masking and redaction, and
 - d. de-identifying correspondence.
- 8.3. These measures are applied based on your preferences or our assessment of your needs.
- 8.4. Once identified as being affected by family violence, your customer record will be flagged in our system to ensure you receive the protections under this policy. Your personal information will be stored securely and will only be accessible by staff who need it to support you. The flag will remain in place until you ask us to remove it. We may also offer additional account security measures such as a customer-defined code word, PIN identifier, or two-factor authentication to verify your identity and prevent unauthorised access to your account. We will not disclose your confidential information to any other person without your prior consent or where we are required to do so by law.
- 8.5. Our organisation will maintain records relating to our compliance with our obligations under the law relating to retailers and family violence. These records will be maintained for at least two years, for as long as you continue to receive assistance from us, or as long as there are any unresolved disputes.

9. What we will do about debts

- 9.1. Our organisation recognises family violence as a potential cause of financial hardship or payment difficulty. Before taking action to recover arrears from an affected customer or transferring affected customer debt to a third party debt collector, we will consider each customer's individual circumstances and take into account the potential impact of debt recovery action at that time on the affected customer. We will aim to find a suitable solution specific to the customer's needs and offer support in accordance with our hardship policy. This will include whether other persons are jointly or severally responsible for the energy usage that may have resulted in the accumulation of any arrears. We will promptly identify situations where debt can be waived or suspended in part or in full, particularly where we assess that debt may have been accrued as a result of financial abuse. Prior to arranging for disconnection of electricity to your premises we will ensure that we take into account the potential impact on you considering your circumstances and any other parties that may be involved in the non-payment of any debt. We will not arrange de-energisation unless we have formed a view that disconnection will not cause harm to you, taking into account your individual circumstances and the potential impact on your safety and wellbeing.
- 9.2. We will not ask for a security deposit from any customer who has or is experiencing family violence and we will waive late fees associated with late payment of a bill
- 9.3. Regardless of whether or not you are in hardship, the support that we offer may include:
 - a. Flexible payment arrangements.
 - b. Reviewing your energy plan and placing you on a more suitable plan.
 - c. Waiving or suspending the debt.
 - d. stopping the collections cycle to ensure that your premise is not de-energized for an overdue bill.

10. Centrepay

- 10.1. You may request that we accept payment using Centrepay as a payment option.
- 10.2. If you are on a standard retail contract, we must accept Centrepay as a payment option.
- 10.3. If you are on a market retail contract, and if Centrepay is available as a payment option, we must allow you to use Centrepay as a payment option.
- 10.4. If you are on a market retail contract and Centrepay is not available as a payment option, we must review the market retail contract.
- 10.5. If as a result of the review an alternative contract that allows Centrepay as a payment option is considered to be more appropriate, we must transfer you to that contract where you give us your explicit informed consent to do so.
- 10.6. If as a result of the review, there is no appropriate alternative contract that allows Centrepay as a payment option, we must make Centrepay available as a payment option under your existing contract.
- 10.7. We won't charge you for the review, for switching contracts, or for ending your old contract early.

11. What support is available

- 11.1. You can access support by contacting:
 - a. our customer service department through various channels such as phone, email, or in-person visit.
 - b. an independent financial counsellor, case worker or an external family violence support services to access resources and support.
- 11.2. We will ensure that we ask your preferred method of communication and will clearly record this on your account. We will communicate with you via this method of communication or, if your preferred method of communication is not practicable, you may communicate with us via SMS, WhatsApp, Messenger, Email, or by Phone. We will keep a record of the ways in which we will communicate with you.
- 11.3. To further safeguard affected customers:

- a. We will disable automated communications such as texts, emails or letters, to prevent messages being inadvertently sent to a perpetrator.
- b. All communications be manually reviewed before they are sent to ensure they are delivered using your preferred communication method.
- c. We will ensure that no communication is sent to a previous address if you have provided us with a new one.

12. Supporting Documentation

- 12.1. We will never request you or a third party acting on your behalf to provide specific documentation or evidence before providing you with support under this policy or the Rules.

13. External Support

- 13.1. We will advise you of external support services, including access to a free interpreter service.
- 13.2. We will also maintain a list of external support services that are published on our website.
- 13.3. We will keep this information up-to-date, ensuring that customers affected by family violence can easily access this assistance.

14. If you have a complaint, question, or feedback

- 14.1. At any time, if you have concerns about your well-being or need support with your energy account, please do not hesitate to contact us.
- 14.2. We take all your concerns and complaints seriously and will handle them in accordance with our Complaints and Dispute Resolution Policy.
- 14.3. We welcome feedback on this policy. If you have feedback on this policy please do not hesitate to contact us.
- 14.4. If you are not satisfied with the outcome of our investigation, you can also contact the state-specific Ombudsman for further assistance.

14.5. See below a list of state specific energy ombudsman contact details.

Ombudsman	Contact no.	Website
Energy and Water Ombudsman (VIC)	1800 500 509	www.ewov.com.au
Energy and Water Ombudsman (SA)	1800 665 565	www.ewosa.com.au
Energy and Water Ombudsman (NSW)	1800 246 545	www.ewon.com.au
Energy and Water Ombudsman (QLD)	1800 662 837	www.ewoq.com.au
Energy and Water Ombudsman (TAS)	1800 001 170	www.energyombudsman.tas.gov.au
Civil and Administrative Tribunal (ACT)	02 6205 4855	www.acat.act.gov.au

15. What external support is available

- 15.1. We will advise you of external support services, including access to a free interpreter service. (see above). We will ensure that this information is provided in a safe, respectful and appropriate manner taking your specific circumstances into consideration.
- 15.2. We will also maintain a list of external support services that are published on our website (see below).
- 15.3. We will keep this information up to date, ensuring that customers affected by family violence can easily access this assistance.
- 15.4. If you or someone you know is experiencing sexual abuse or family violence contact:

Service	Phone	Website	Support provided
1800 RESPECT (National)	1800 737 732 (24/7)	https://www.1800respect.org.a u/	24/7 counselling, information, and referral for people impacted by family, domestic or sexual violence

Lifeline (National)	13 11 14 (24/7)	www.lifeline.org.au	24/7 crisis support and suicide prevention for people in emotional distress
Men's Referral Service (National with localised support)	1300 766 491	www.ntv.org.au	Support and referrals for men using violence, and those impacted by male family violence
13YARN (First Nations – National)	13 92 76	www.13yarn.org.au	Crisis support line for Aboriginal and Torres Strait Islander people, run by Indigenous people.
QLife (LGBTIQA+ - National)	1800 184 527 (3pm – midnight)	www.qlife.org.au	Telephone and webchat peer support for LGBTIQA+ people across Australia.
DVConnect - Queensland	1800 811 811 (Women 24/7), 1800 600 636 (Men 9am – midnight)	www.dvconnect.org	Crisis counselling, transport, safety planning and shelter referrals (QLD)
Domestic Violence Crisis Service – ACT	(02) 6280 0900 (24/7)	www.dvcs.org.au	Crisis accommodation, outreach, safety planning and support services (ACT)
Women's Safety Services – South Australia	1800 800 098 (24/7)	www.womenssafety services.com.au	Safety planning, accommodation and support for women and children (SA)
Family Violence Counselling and Support Service - Tasmania	1800 608 122 (24/7)	www.legalaid.tas.gov.au/family-violence	Counselling, legal advice and support for people experiencing family violence (TAS)

Version Control

Version	Amendment	Author and date
Version 1.0	Initial draft	CQ – 01/02/2025
Version 1.1	Reviewed	Drisha Natarajan 13/02/2026



Customer Hardship Policy



Contents

1. Introduction	3
2. About our Hardship Policy	4
3. Our Hardship commitment	4
4. Accessing our Hardship Policy	5
5. Eligibility for SUPA Energy's Hardship Program	5
6. Re- Entry into SUPA Energy's Hardship Program	6
7. What we will do to help you	6
8. Payment options.....	7
9. Successful Completion	8
10. Other Supports to help you Pay your Energy Bill	9
11. Information about government concessions and rebates	9
12. Information about financial counselling & advice	10
13. Further information about Centrepay	10
14. Our programs and services	10
15. We want to check you have the right Energy plan	10
16. We will work with you	11
17. We can help you Save Energy	11
18. What we will do to help you	12
19. Contact us	12
20. Complaints	13
21. Training	14
22. Privacy.....	14
23. Review of the policy.....	14
Version Control.....	15

1. Introduction

1.1. This Policy applies to all residential customers living in Queensland, New South Wales, the Australian Capital Territory and South Australia 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.

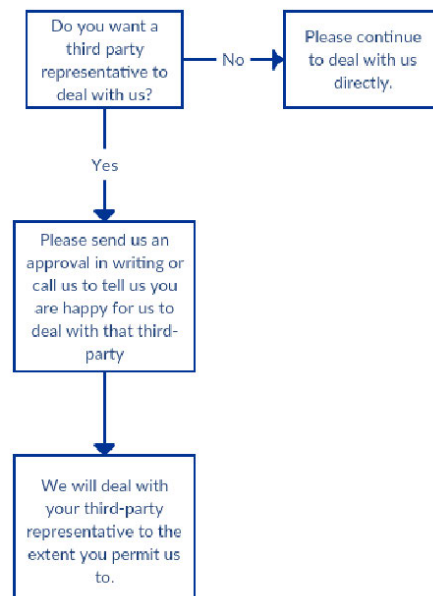
Support Person

1.5. You may provide your permission for us to deal with a third-party support person via whatever means are convenient to you.

1.6. You would like a support person to represent you, you may request this at any time, and we will send a consent form or phone you to ensure that you consent (we will accept 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 that support person as we would with you.

1.8. The diagram below summarises our approach.



2. About our Hardship Policy

- 2.1. We support customers who are experiencing hardship. Electricity and gas are essential services, so we must do as much as possible to help you maintain access to your supply of energy.
- 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. The Customer Hardship policy

3. Our Hardship commitment

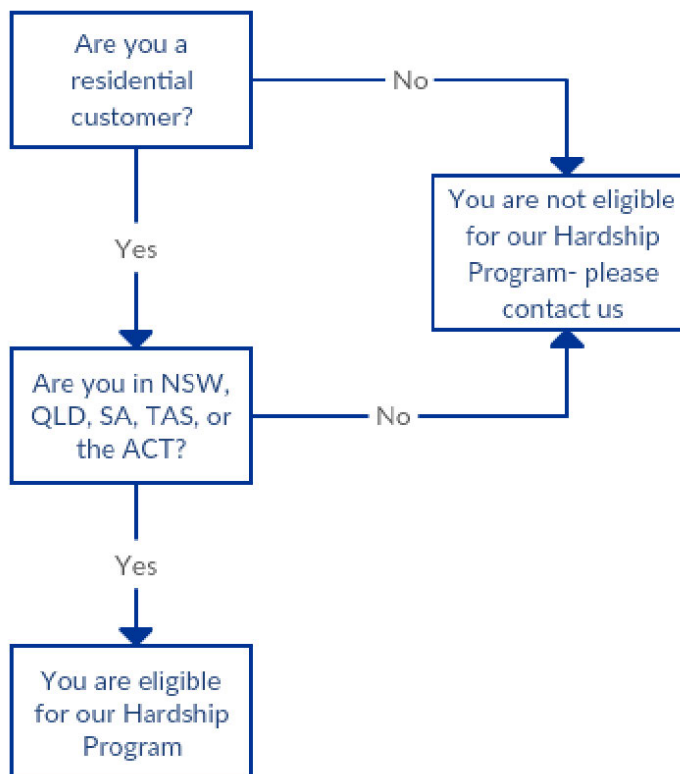
- 3.1. As a SUPA Energy customer, we will:
 - 3.1.1. Provide you with clear information in a timely manner on what assistance is available to you under this Policy
 - 3.1.2. As soon as reasonably practicable, provide you with the assistance you are entitled to under this Policy
 - 3.1.3. Be respectful, compassionate and treat your circumstances with sensitivity and respect for your privacy
 - 3.1.4. 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.
 - 3.1.5. Provide you equitable access to this Policy and ensure that it is consistently applied in a transparent way
 - 3.1.6. Waive any late payment fees if you are a participating in the Hardship Program
 - 3.1.7. Maintain customer assistance programs, such as affordable payment plans
 - 3.1.8. 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
 - 3.1.9. Be transparent and accessible and communicate to you, your nominated support person, financial counsellors and community assistance agencies when necessary
 - 3.1.10. Not disconnect your energy supply while you are actively participating in our hardship program

4. Accessing our Hardship Policy

- 4.1. You can access a printable version of our Hardship Policy via the URL/hyperlink on the homepage of our website. You can also download an electronic copy of this Hardship Policy at {Company_Website}. 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.
- 4.2. If you have specific communication requirements, such as limited internet access, low proficiency in English, residence in a remote area, or a need for an interpreter, please inform us and we will work with you to ensure that you can access our hardship policy.

5. Eligibility for SUPA Energy'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 SUPA Energy energy bill for whatever reason, please contact us.
- 5.3. We will direct customers to this Policy and our Hardship Program if we believe they 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.

6. Re- Entry into SUPA Energy'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. That is, 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 for hardship assistance within 5 business days after contacting us.
- 7.7. We will let you know if you are accepted into our hardship program within 10 business days from receipt of the application.
- 7.8. If you are accepted into our hardship program, we will:
 - 7.8.1. Tell you if you are on the right energy plan or if there is a better plan for you

- 7.8.2. Tell you about government concessions, relief schemes or energy rebates you may be able to receive
- 7.8.3. Give you ideas about how to reduce your energy use
- 7.8.4. Talk to you about a payment amount that suits your circumstances
- 7.9. We can send you a free copy of our Hardship Policy.
- 7.10. Your free copy of 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. 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.
- 8.10. If this contact fails, SUPA Energy will try again within 2 business days. If you fail to respond on our second attempt, we will make a third attempt 2 business days later. If contact is made, we can look to adjust the plan as above.

What you must do

- 8.11. Tell us if your situation changes and you can no longer make the payments in your plan. We can then review your payment arrangements.
- 8.12. Tell us if your contact details change.
- 8.13. We may stop helping you if you:
 - 8.13.1. Stop making payments under your plan
 - 8.13.2. Do not tell us when your contact details change.
- 8.14. If you have had two payment plans cancelled in the last 12 months because you did not follow your plan:
 - 8.14.1. We do not have to offer you another plan
 - 8.14.2. 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 SUPA Energy, 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 SUPA Energy's normal billing cycle.

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 the policy; and
 - 9.3.3. Communicate with you regularly.

Changing a Payment Plan

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

Leaving a Payment Plan

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

- 9.6. If you stop meeting your instalment payments SUPA Energy will attempt to contact you by your preferred method to discuss whether there needs to be changes made to the original payment plan. We can reassess the original payment plan and make changes to help restore payments.
- 9.7. If this contact fails, SUPA Energy will try again within 2 business days. If you fail to respond on our second attempt, we will make a third attempt 2 business days later. If contact is made, we can look to adjust the plan as above.
- 9.8. It is important that you actively participate with our hardship program. If you refuse to engage with us after these repeated attempts to make contact, we will remove you from our hardship program.
- 9.9. You may leave the hardship program by transferring to another retailer.
- 9.10. If, as a participant in the hardship program, you fail to make payments as per the agreed payment plan and refuse to engage with us, or if you transfer to another retailer, you will default back to our usual debt collections process.
- 9.11. Disconnection and debt collection are SUPA Energy'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 programs

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. If we become aware that you may be entitled to a concession or rebate, or any other form of assistance, we will notify you by email or phone. Further information on relevant assistance programs can be found by visiting the following websites:

- New South Wales, visit www.energy.nsw.gov.au/energy-consumers/financial-assistance
- Queensland, visit www.communities.qld.gov.au or call 13 74 68
- South Australia, visit www.dcsi.sa.gov.au or call 1800 307 758
- ACT, visit www.acat.act.gov.au

12. Information about financial counselling & 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 setup 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:
 - <http://yourenergysavings.gov.au>
 - <http://www.energyrating.gov.au>
 - <https://www.choice.com.au>
 - <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 in-home energy audit. We will conduct an initial assessment to determine whether you would benefit from an in-home 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 will explain whether we will fully or partially cover the cost of the in-home energy audit. We may offer such an in-home energy audit free of charge, for example, if

there is high unexplained electricity consumption within your household and your debt level is high.

- 17.6. 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 via phone or post in accordance with the customer's preferred method of communication;
 - 18.2.3. Ensuring that customers aren't disadvantaged by delays in communication; and
 - 18.2.4. Referral to services that support customers with disabilities.
- 18.3. If you are in our hardship program or are looking to enter the program, and live in a regional area or do not have access to the internet, we can, upon request, provide all relevant material by post for free, making sure that postage delays do not disadvantage you.
- 18.4. If you have not indicated a preference for how you wish to receive written communication, we will send you the Hardship Policy to you via post.
- 18.5. We will provide bills and documentation in large print where this would be helpful to you.
- 18.6. If you need an interpreter, please call the Translating and Interpreting Service (TIS National) on 131 450.
- 18.7. If you are deaf or have a hearing or speech impairment, please call the National Relay Service on 133 677.
- 18.8. 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 with a member of our staff that is specifically trained to assist you with any payment difficulties, please contact us as soon as possible by:
- Email: support@supaenergy.au or

Phone: 1300 761 390

- 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. SUPA Energy will work with you to resolve any complaints you may have. If you have a complaint, you can contact us by email support@supaenergy.au or post at PO Box 429, South Melbourne, VIC, 3205. You can also call 1300 761 390 to leave a complaint.
- 20.2. Once a complaint has been received, a representative from SUPA Energy will immediately acknowledge the complaint and prioritise it for resolution.
- 20.3. Complaints about this Policy or the Hardship Program will be given high priority and we will try to respond as soon as possible.
- 20.4. In all instances, SUPA Energy will:
 - 20.4.1. Freely accept complaints lodged on our website, in person, by telephone, facsimile, email or letter;
 - 20.4.2. Acknowledge any complaint received as soon as possible;
 - 20.4.3. Begin an investigation into the reasons for a complaint within 24 hours of acknowledgment;
 - 20.4.4. Keep the complainant updated about the investigation and any proposed resolution;
 - 20.4.5. Notify the complainant as soon as possible of the outcome of our investigation and any proposal we have for resolution; and
 - 20.4.6. 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.
- 20.5. As per our Standard Complaints and Dispute Resolution Procedures, if you are not satisfied with our proposed resolution, you can escalate your complaint within the business. If you are unhappy with the outcome or at any other time, 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 and 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 and Water Ombudsman SA (EWOSA)

Telephone: 1800 665 585

Website: www.ewosa.com.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 regular face to face and online webinar training 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 reviewed and refreshed on a regular basis. 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. Staff will attend meetings and training provided by financial counsellors and community organisations to assist in understanding the issues that may be faced by customers.
- 21.4. A record of training will be kept for all staff.

22. Privacy

- 22.1. SUPA Energy 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 annually.

Version Control

Version	Amendment	Date
Version 1	Initial draft	19 November 2024
Version 1.1	N/A	Reviewed 19 Nov 2025

2025



COMPLIANCE QUARTER PROFILE



ISO 9001
QUALITY



WWW.COMPLIANCEQUARTER.COM.AU

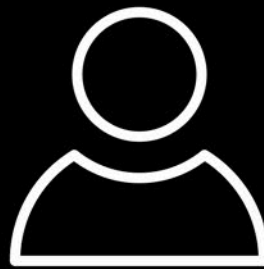
WHY

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

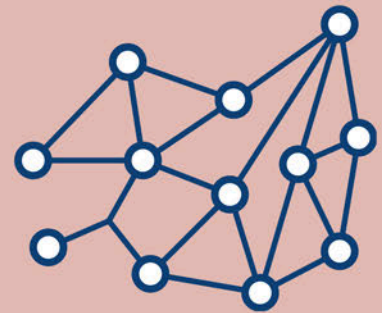
With energy expertise



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.



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

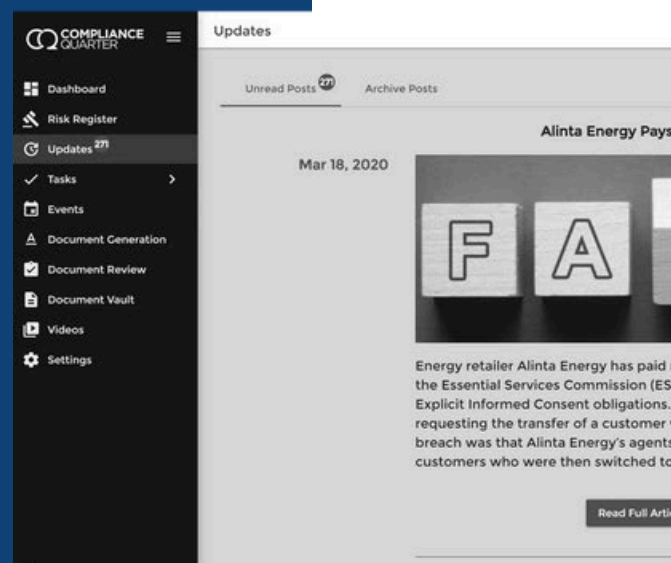
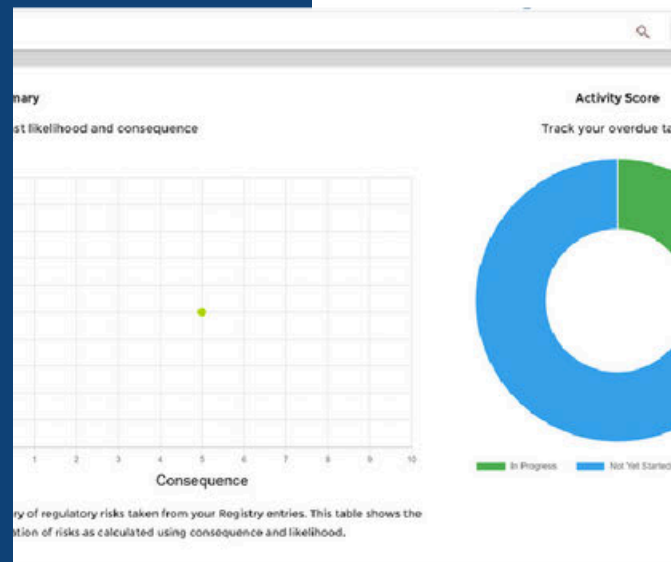
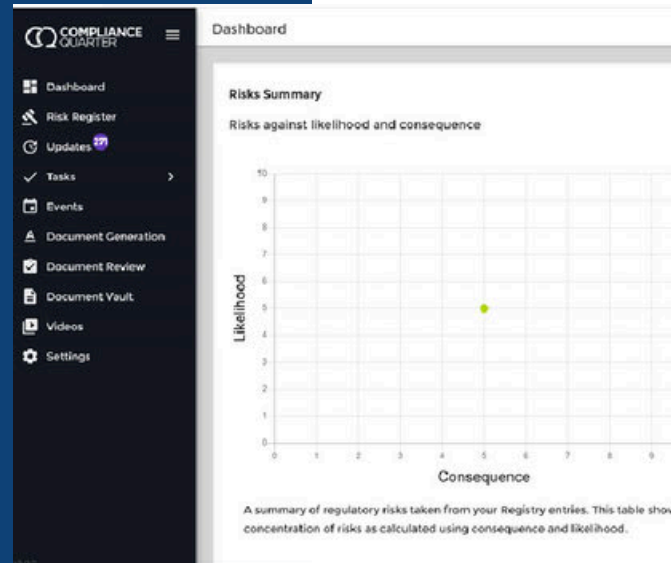
Automated document review: Titan accepts uploaded contracts and identifies red flags, risks that need to be reviewed and missing clauses.

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



25th November 2024

Our Ref: 1071-37

[REDACTED]
SUPA Energy Pty Ltd
Suite 2, Level 4, 101 Moray Street,
SOUTH MELBOURNE VIC 3205

Dear [REDACTED],

Re: SUPA Energy Pty Ltd Compliance and Risk Audit Action Verification

Further to Shared Safety and Risk's independent audit of SUPA Energy Pty Ltd's compliance and risk management systems in November 2024, I can confirm that we have reviewed SUPA Energy's audit response and verified completion of the recommended actions through document review.

As such we can confirm SUPA Energy 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].

Yours sincerely,

[REDACTED]
[REDACTED]
Exemplar Global Lead Auditor #114812
Director

SUITABILITY DECLARATION

I, **GEOFF HORTH** of [REDACTED], being a director of Supa Energy Pty Ltd ACN 657 976 086 (the Applicant), declare that the Applicant, the Applicant's associates, any other business where the Applicant's officers have held an officer position and any other entity that exerts control over the Applicant has not had:

- a. 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 except for that disclosed in Schedule 1.
- b. Any previously revoked authorisations, authorities or licences held in any industry.
- c. Any failed authorisation, authority, or licence applications in any industry.
- d. Any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry.
- e. Any situation where the Applicant or an associate of the Applicant, 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.

This Declaration is signed on 25 November 2024.

[REDACTED]
Geoff Horth
Director and Group CEO





SCHEDULE 1

Director Penalty Notice issued in or about May 2023 by the Australian Tax Office for tax debts incurred by Supa Technologies Pty Ltd and its subsidiaries prior to 15 December 2022. The tax debts have now been fulfilled and no further infringements have occurred.

SUITABILITY DECLARATION

I, GEOFF HORTH of [REDACTED], being a director of Supa Energy Pty Ltd ACN 657 976 086 (the Applicant), declare that the Applicant's current directors, and any other person that exerts control over the Applicant's business activities and all persons who are responsible for significant operating decisions for the Applicant 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 the Applicant's capacity as an energy retailer.

This Declaration is signed on 25 November 2024.

[REDACTED]
Geoff Horth
Director and Group CEO




SUITABILITY DECLARATION

I, **GEOFF HORTH** of [REDACTED], being Chief Executive Officer of Supa Energy Pty Ltd ACN 657 976 086 (the Applicant), declare that:

- No member of the Applicant'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 the Applicant's management team.

This Declaration is signed on 25 November 2024.

[REDACTED]
Geoff Horth
Director and Group CEO

A handwritten signature in blue ink, appearing to read 'Geoff Horth', is written over the printed name and title.

Rodney Mills
Chief Financial Officer
Smart Urban Properties Australia Pty Ltd
Suite 2, Level 4, 101 Moray Street
South Melbourne VIC 3205

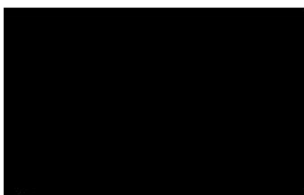
Grant Thornton Audit Pty Ltd
Level 22 Tower 5
Collins Square
727 Collins Street
Melbourne VIC 3008
GPO Box 4736
Melbourne VIC 3001
T +61 3 8320 2222

To whom it may concern

I, Adam Pitts of [REDACTED] being a Partner at Grant Thornton Audit Pty Ltd, as independent auditor of Smart Urban Properties Australia Pty Ltd (ACN 654 447 168) (Parent), the parent company of Supa Energy Pty Ltd (ACN 657 976 086) ("the Applicant"), declare that based on the current financial information available to me as of 21 Nov 2024, nothing has come to my attention that would indicate that Smart Urban Properties Australia Pty Ltd would be unable to pay its debts as and when they fall due. Further:

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

This Declaration is signed on 21 November 2024



/ Adam Pitts
Partner - Audit & Assurance

www.grantthornton.com.au
ACN-130 913 594

Grant Thornton Audit Pty Ltd ACN 130 913 594 a subsidiary or related entity of Grant Thornton Australia Limited ABN 41 127 556 389 ACN 127 556 389. 'Grant Thornton' refers to the brand under which the Grant Thornton member firms provide assurance, tax and advisory services to their clients and/or refers to one or more member firms, as the context requires. Grant Thornton Australia Limited is a member firm of Grant Thornton International Ltd (GTIL). GTIL and the member firms are not a worldwide partnership. GTIL and each member firm is a separate legal entity. Services are delivered by the member firms. GTIL does not provide services to clients. GTIL and its member firms are not agents of, and do not obligate one another and are not liable for one another's acts or omissions. In the Australian context only, the use of the term 'Grant Thornton' may refer to Grant Thornton Australia Limited ABN 41 127 556 389 ACN 127 556 389 and its Australian subsidiaries and related entities. Liability limited by a scheme approved under Professional Standards Legislation.

Financial Resources Declaration

I, **RODNEY MILLS** of [REDACTED], being Chief Financial Officer of Supa Energy Pty Ltd (ACN 657 976 086), declare that Supa Energy Pty Ltd (ACN 657 976 086) is a going concern and I am unaware of any factor that would impede Supa Energy Pty Ltd (ACN 657 976 086)'s ability to finance its energy retail activities under the authorisation for the next 12 months.

This Declaration is signed on 28 November 2024.

A large black rectangular redaction box covering the signature of Rodney Mills.

Rodney Mills

Chief Financial Officer

