YURRINGA ENERGY PTY LTD

ABN 88 630 357 103

APPLICATION FOR RETAILER AUTHORISATION

Electricity — National Electricity Market (NEM)

Under the National Energy Retail Law (NERL)

Submitted to: Australian Energy Regulator

General Manager, Retail Markets Branch

April 2026

PUBLIC VERSION — This is the public version of Yurringa Energy's application for retailer authorisation. Confidential information has been omitted in accordance with the confidentiality claims set out in the Confidentiality Claims section of this application. The confidential version of this application is provided separately to the AER. Yurringa Energy requests that the AER notify it before considering disclosure of any further information.

About Yurringa Energy

Yurringa Energy Pty Ltd (Yurringa Energy) is Australia's first 100% Indigenous-owned and managed electricity retailer. Incorporated on 3 December 2018, the company was established to supply renewable and competitively priced electricity to Commercial and Industrial (C&I) customers, while delivering measurable economic and social outcomes through Indigenous ownership, employment and participation in Australia's energy sector.

The company is now seeking full retailer authorisation under the National Energy Retail Law to expand its operations in a controlled and compliant manner across the National Electricity Market (NEM).

IMPORTANT: Yurringa Energy will supply electricity exclusively to Large Customers consuming more than 100 MWh per annum. Yurringa Energy will NOT supply Residential customers or Small Business customers classified as Small Customers under the NERL. Where a Large Customer has associated premises with individual consumption below 100 MWh pa (a 'small customer tail'), Yurringa Energy will seek the Explicit Informed Consent of those customers to aggregate consumption across all sites in accordance with NERR Rule 5 and treat the aggregated load as a Large Customer. Because of this approach a number of the requirements pertaining to small customers do not apply, these are identified in section 9.6.

Supported by a Framework Agreement with one of Australia's largest Gentailers, Yurringa Energy commenced electricity retail operations in July 2024 under a retail licence exemption and has since supplied electricity to large, complex customers across multiple NEM jurisdictions. The company now seeks full retailer authorisation under the NERL to expand its operations in a controlled, sustainable and compliant manner.

Yurringa Energy's business model uniquely combines strong operational and wholesale market capability with a clear social purpose — enabling corporate and government customers to meet their social procurement and ESG obligations while contributing to 'Closing the Gap' through redirecting a portion of retail margins into Indigenous employment, training and community initiatives.

The company currently runs retail operations for several large C&I customers which include:

- Spark Consortium – North East Link Project (Victoria): Supply of electricity to tunnel boring machines and associated construction sites across metropolitan Melbourne.
- NBN Co (Queensland and South Australia): Supply of electricity to telecommunications infrastructure assets across multiple sites.

- Terra Verde – Suburban Rail Loop (Victoria): Supply of electricity to tunnel boring machines and associated construction sites across metropolitan Melbourne.
- LS Precast (Victoria) – Supply of electricity for manufacture of concrete tunnel segments for the North East Link Project and the Suburban Rail Loop.

The successful contractual and operational execution of these customer contracts demonstrates that Yurringa Energy already has a strong operational capability, technical competence, prudential readiness and ability to service high-load, multi-site customers under complex metering, settlement and market arrangements.

Yurringa Energy intends to 'grandfather' current customer contracts and the corresponding wholesale arrangements under the existing framework agreement until such time as the customer contract end date. Only newly acquired customers will be serviced under a retail authorisation.

Yurringa Energy has secured sufficient startup funding to meet AEMO prudential requirements and operational liquidity needs for at least the first 24 months post-authorisation.

The company's mission is:

"Switch today for a better tomorrow"

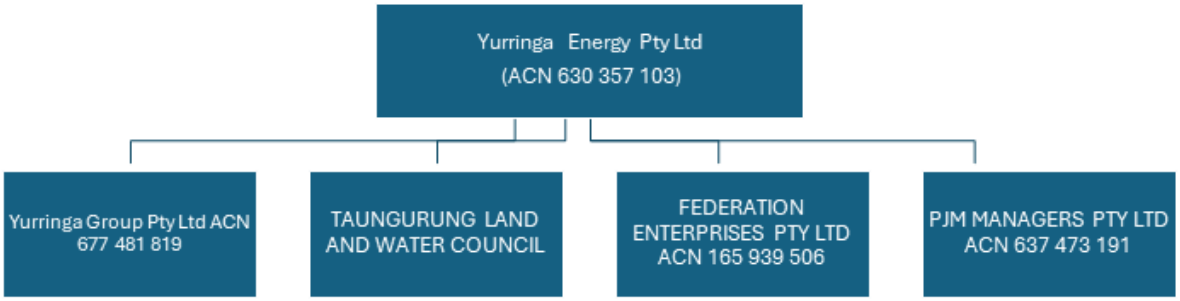
Energy sales to Large Customers will be supported through 'whole of meter' wholesale electricity supply arrangements with established wholesale market generators. Negotiations with three counterparties are at an advanced stage and are expected to be concluded prior to commencement of authorised retail operations.

General Particulars

Legal Name	Yurringa Energy Pty Ltd
Trading Name	Yurringa Energy
ABN	88 630 357 103
ACN	630 357 103
Registered Address	708/668 Swanston Street, Carlton 3053
Correspondence Address	Level 1, 116 Rokeby Street, Collingwood VIC 3066
Contact Person	Arron Wood, Chief Executive Officer
Telephone	[redacted]
Email	[redacted]
Form of Energy	Electricity only
Intended Commencement Date	July 2026, subject to AER approval
Scope of Operations	Sale of electricity exclusively to Large Customers (>100 MWh pa) across the NEM. No residential supply.
Target Jurisdictions	Queensland (QLD), New South Wales (NSW), Australian Capital Territory (ACT), South Australia (SA)
Types of Customers	LARGE CUSTOMERS ONLY: Customers consuming more than 100 MWh pa as defined in s.5 of the NERL. Where a large customer portfolio includes sites consuming <100 MWh pa, Yurringa Energy will seek Explicit Informed Consent to aggregate under NERR Rule 5. Yurringa Energy will NOT supply residential customers or single-site Small Customers.
AEMO Registration Status	Application to AEMO as a Market Customer is in progress.

This application is for an electricity retailer authorisation only.

Yurringa Energy Company Structure



Shareholding as follows:

Yurringa Group Pty Ltd [redacted]

Taungurung Land and Waters Council [redacted]

Federation Enterprises Pty Ltd [redacted]

PJM Managers Pty Ltd [redacted]

PART A — ORGANISATIONAL AND TECHNICAL CAPACITY

The AER Guideline requires applicants to demonstrate the necessary organisational and technical capacity to hold a retailer authorisation, including industry experience, operational systems, staff expertise and the ability to comply with regulatory obligations under the energy laws and to operate in the NEM. Yurringa Energy addresses each of these requirements below.

1.1 Previous Experience as an Energy Retailer

Yurringa Energy commenced electricity retail operations in July 2024 under an AER retail licence exemption. Operations have been conducted across Victoria, Queensland and South Australia. Electricity is the only form of energy sold.

Name & Role	Qualifications & Relevant Experience
Spark Consortium — North East Link Project (VIC)	Supply of electricity to tunnel boring machines and associated construction sites across metropolitan Melbourne. High-load, multi-site, complex metering and settlement arrangements. Active since 2024.
NBN Co (QLD & SA)	Supply of electricity to telecommunications infrastructure assets across multiple sites in QLD and SA. Multi-jurisdiction, multi-NMI, ongoing contract.
Terra Verde — Suburban Rail Loop (VIC)	Supply of electricity to tunnel boring machines and construction sites across metropolitan Melbourne. High-load, complex market arrangements. Active since 2024.
LS Precast (VIC)	Supply of electricity for manufacture of concrete tunnel segments for the North East Link and Suburban Rail Loop projects. Industrial load, ongoing contract.

These contracts have been successfully managed from acquisition through contracting, provisioning, metering, billing and ongoing account management. No compliance breaches or customer complaints have been recorded during this period of operations.

Furthermore, Yurringa Energy has employed a number of highly experienced and skilled energy industry professionals to bolster its technical capability as it applies to become a direct market participant.

1.2 Forms of Energy Sold

Yurringa Energy sells electricity only. No gas retailer authorisation is sought through this application.

1.3 Scale of Operations

Yurringa Energy currently supplies a limited number (31 NMIs) of large C&I customers across Victoria, Queensland and South Australia, all consuming in excess of 100 MWh per annum. This controlled scale has enabled the business to establish and test its systems, governance and compliance frameworks in a live operating environment prior to seeking full authorisation. Where a Large Customer has associated premises with individual consumption below 100 MWh pa (a 'small customer tail'), Yurringa Energy will seek the Explicit Informed Consent from those customers to aggregate consumption across all sites in accordance with NERR Rule 5 and treat the aggregated load as a Large Customer. Because of this approach a number of the requirements pertaining to small customers do not apply, these are identified in section 9.6.

Post-authorisation, the business will scale progressively into broader C&I markets across QLD, NSW, ACT and SA, targeting exclusively Large Customers (>100 MWh pa). Yurringa Energy will NOT target residential customers or single-site Small Customers at any stage of its current business plan.

Execution ready agreements have been negotiated with a highly credentialed SaaS Customer Information System (CIS) provider and with an experienced Managed Services Provider.

1.4 Conduct of Retail Activities

Yurringa Energy delivers retail services through a hybrid in-house and managed service provider (MSP) operating model. Customer-facing and strategic functions are delivered directly by Yurringa Energy staff; back-of-house operational and market functions are delivered by a highly credentialed SaaS Customer Information System (CIS) provider and with an experienced Managed Services Provider.

The company currently runs retail operations for several large C&I customers which include:

- Spark Consortium – North East Link Project (Victoria): Supply of electricity to tunnel boring machines and associated construction sites across metropolitan Melbourne.
- NBN Co (Queensland and South Australia): Supply of electricity to telecommunications infrastructure assets across multiple sites.
- Terra Verde – Suburban Rail Loop (Victoria): Supply of electricity to tunnel boring machines and associated construction sites across metropolitan Melbourne.
- LS Precast (Victoria) – Supply of electricity for manufacture of concrete tunnel segments for the North East Link Project and the Suburban Rail Loop.

The successful contractual and operational execution of these customer contracts demonstrates that Yurringa Energy already has a strong operational capability, technical competence, prudential readiness and ability to service high-load, multi-site customers under complex metering, settlement and market arrangements.

Yurringa Energy intends to 'grandfather' current customer contracts and the corresponding wholesale arrangements under the existing framework agreement until such time as the customer contract end date. Only newly acquired customers will be serviced under a retail authorisation.

4. Organisational Structure and Governance

Yurringa Energy's organisational structure and governance framework is established through the Board Charter, both of which have been updated to ensure full consistency with the operational and compliance arrangements described throughout this application.

Board of Directors:

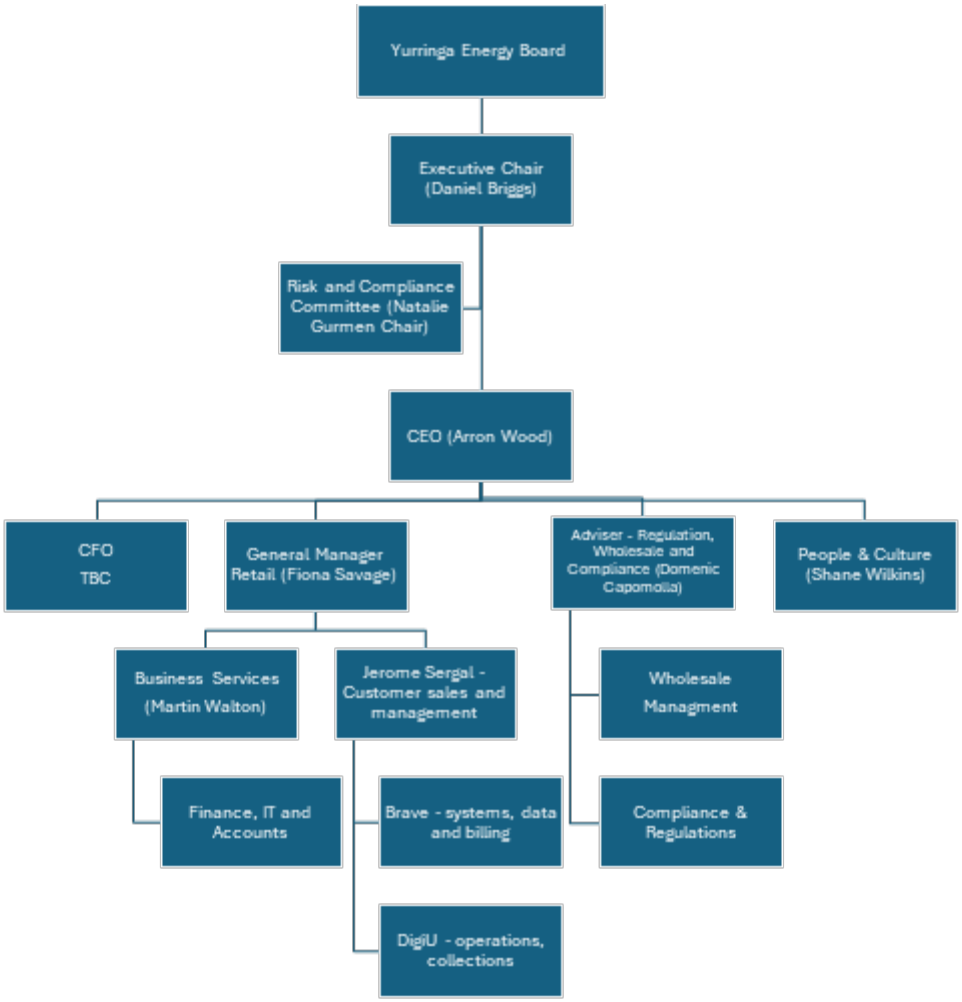
- Executive Chair (Daniel Briggs) — Indigenous leadership, strategic governance
- Non-Executive Director and Advisor (Domenic Capomolla) — energy industry experience, risk oversight
- Chief Executive Officer (Arron Wood) — day-to-day management, AER compliance accountability
- Independent Non-Executive Directors — appointed in accordance with the Company Constitution (Attachment 2, Confidential)

Risk, Compliance and Audit Committee (Recently constituted Board sub-committee):

- Provides oversight of risk, compliance and financial management
- Meets bi-monthly, or more frequently when required
- Charter is attached as Attachment 11 (Confidential – not included in public version)

Management structure:

- CEO — accountable for all regulatory compliance with the NERL and NERR
- General Manager Retail — accountable for retail operations, customer management, MSP oversight and day-to-day compliance
- General Manager, People & Culture — workforce capability and training
- Business Services Manager — commercial development and customer acquisition



5. Number of Employees

Business Unit / Function	Current FTE	Planned FTE (Post-Auth.)
Executive / Leadership (CEO, Executive Chair, NED)	3	3
Customer & Operations (incl. MSP oversight)	1	3
Business Services / Commercial Development	1	2
People & Culture / HR	1	1
Total	**6**	**9**

6. Qualifications and Experience of Officers

The following table provides summarised CV summaries for each officer. Full CVs have also been provided. Each officer's experience is mapped to the competencies required to meet the obligations of an authorised electricity retailer under the NERL and NERR.

Name & Role	Qualifications & Relevant Experience
Daniel Briggs Executive Chair Qualification: LLB (2009)	BACKGROUND: Yorta-Yorta man. Founding Managing Director and Executive Chair of Yurringa Energy since incorporation on 3 December 2018. CAREER HISTORY: Bachelor of Laws (LLB), 2009. Legal practice supporting Indigenous justice. Senior roles supporting Indigenous business establishment and community enterprise development. Extensive stakeholder engagement across government, corporate and community sectors. ENERGY MARKET COMPETENCIES: Board governance and strategic oversight of an authorised energy retailer. Indigenous stakeholder and social procurement strategy. Regulatory engagement with Commonwealth and state government bodies. NERL/NERR RELEVANCE: Board-level governance accountability under the NERL. Ensures alignment of Yurringa Energy's obligations with its Indigenous ownership mission. Director responsibilities under s.92 entry criteria.
Domenic Capomolla Advisor & Non-Executive Director Qualification: GAICD	BACKGROUND: Seasoned energy executive with more than 25 years starting, leading and scaling energy retail businesses in Australia and internationally. CAREER HISTORY: Graduate, Australian Institute of Company Directors (GAICD). Executive roles at: Pacific Hydro Australia (renewable energy), BlueNRG (electricity and gas retail), Sumo Power (CEO — energy retail start-up), Simply Energy/Engie (executive), Alinta Energy (executive), Mirabel Foundation (board). ENERGY MARKET COMPETENCIES: Deep expertise across the full energy retail value chain

Name & Role	Qualifications & Relevant Experience
	— wholesale procurement, NEM participation, AEMO registration, retail operations, regulatory compliance, NERL obligations, customer contract management, prudential management and AEMO settlement. NERL/NERR RELEVANCE: Directly advises on all aspects of AER compliance, retailer authorisation obligations, wholesale risk and retail operations. Provides the primary energy industry experience required by the AER Guideline's organisational capacity criterion.
Natalie Gurman Non-Executive Director	BACKGROUND: A senior energy leader with a diverse background spanning Secretarial functions, sales and marketing, Compliance. CAREER HISTORY: Executive roles at: Engie, AGL, Vocus and Business NSW ENERGY MARKET COMPETENCIES: Deep expertise across much of the energy retail value chain — sales and marketing, growth, regulatory compliance, NERL obligations and customer contract management. NERL/NERR RELEVANCE: Chair of the Yurringa Risk, Compliance and Audit board sub-committee. Advises on compliance, audit and risk aspects of retail participation in the NEM.
Arron Wood Chief Executive Officer Contact: [redacted]	BACKGROUND: Seasoned executive and former Deputy Lord Mayor of Melbourne. Over two decades of leadership across public, private and not-for-profit sectors. CAREER HISTORY: Deputy Lord Mayor, City of Melbourne (elected leadership, strategic governance, stakeholder management at state and federal level). Senior executive roles in private and not-for-profit sectors including financial management, commercial strategy, sustainable development and innovation leadership. ENERGY MARKET COMPETENCIES: Business leadership, financial management, regulatory engagement, stakeholder management, strategic

Name & Role	Qualifications & Relevant Experience
	planning, team building and organisational governance. NERL/NERR RELEVANCE: Accountable as CEO for all regulatory compliance obligations under the NERL and NERR. Nominated contact person for this AER authorisation application. Responsible for all AER reporting obligations, including under the AER Performance Reporting Procedures and Guidelines.
Fiona Savage **General Manager Retail** **22+ years energy sector experience**	BACKGROUND: Senior energy industry leader with over 22 years' experience in the Australian energy sector, specialising in retail start-ups, C&I mass market electricity and gas retailing, operational management and NEM market participation. CAREER HISTORY: Pacific Blue: Executive Manager Retail Operations and Contractor. Sumo Power: General Manager Information Technology and General Manager Operations. Australian Energy Market Operator: Manager Retail Market Development EnergyAustralia (TRUenergy): Senior Industry Development Manager Simply Energy: Regulatory Manager – Industry Operations, Operations Manager and Customer Service Manager (C&I) ENERGY MARKET COMPETENCIES: End-to-end C&I and mass market retail operations. NEM settlement and AEMO market procedures. Pricing strategy and risk mitigation. Third-party provider management. Meter data management. Renewable energy and decarbonisation solutions. Multi-jurisdiction retail operations (QLD, NSW, VIC, SA). NERL/NERR RELEVANCE: Directly responsible for Yurringa Energy's retail operations compliance, customer management, MSP oversight and day-to-day obligations under the NERL and NERR. Primary internal expert on NEM processes, MSATS, billing obligations and customer contract requirements.
Shane Wilkins General Manager, People & Culture	BACKGROUND: Over 20 years' experience in Human Resources and contact centre

Name & Role	Qualifications & Relevant Experience
20+ years HR/contact centre experience	management, with a strong track record establishing teams, systems and processes in growth businesses. CAREER HISTORY: Senior HR roles in service-sector businesses. Established and managed contact centre operations. Workforce planning, capability development and performance management in regulated environments. ENERGY MARKET COMPETENCIES: Workforce capability frameworks, compliance training program design and delivery, contact centre operations relevant to customer complaints and service delivery under the NERR. NERL/NERR RELEVANCE: Responsible for ensuring all staff are appropriately trained to meet NERL and NERR obligations. Manages the compliance training register and monitors staff capability gaps as required by the AER Guideline's organisational capacity criterion.
Martin Walton Business Services Manager 15+ years commercial experience	BACKGROUND: Over 15 years' experience in account management, business development, operational management and commercial strategy. CAREER HISTORY: Senior account management and business development roles across multiple industries. Proven track record in new account prospecting, incremental growth strategy, operational management and business planning. ENERGY MARKET COMPETENCIES: Commercial strategy, customer acquisition, contract negotiation, account management and business planning relevant to C&I electricity retail. NERL/NERR RELEVANCE: Responsible for customer acquisition and contracting, ensuring all customer-facing commercial activities comply with NERL and NERR requirements including explicit informed consent and contract disclosure obligations.

7. Outsourced Functions and Third-Party Arrangements

Yurringa Energy has procured a SaaS Customer Information System (CIS) platform from a highly experienced and reputable provider. Yurringa Energy outsources selected back-office retail functions to a Managed Service Provider (MSP). Yurringa Energy retains full accountability for compliance with the NERL and NERR regardless of which functions the MSP performs. The following table sets out, for each outsourced function: the function, the internal owner at Yurringa Energy, and the MSP's delivery responsibility.

7.1 Functions Outsourced — Responsibility Matrix

Function	Yurringa Energy Internal Owner	MSP Delivery Responsibility
Customer onboarding and MSATS data management	General Manager Retail	MSP enters new customer data into MSATS, manages transfers (B2B), and validates NMI data prior to supply commencement.
Market interaction and transaction management (AEMO)	General Manager Retail	MSP submits and manages all market transactions via AEMO's e-Hub, including transfers, energisations and de-energisations in accordance with B2B Procedures.
Meter data management and validation	General Manager Retail	MSP collects, validates and processes interval meter data. Manages substitution and estimation in accordance with the Metering Code.
Billing services — invoice generation and delivery	General Manager Retail	MSP generates customer invoices in accordance with contractual terms and NERR billing requirements. Issues bills within required timeframes.
Payment processing and debt management	General Manager Retail	MSP processes customer payments and manages overdue accounts, escalating to Yurringa Energy management for any disconnection approvals (see Attachment 10).

Function	Yurringa Energy Internal Owner	MSP Delivery Responsibility
Network tariff management and reconciliation	General Manager Retail	MSP applies correct network tariffs, manages distributor billing and performs settlement reconciliation against AEMO market data.

7.2 & 7.3 Third-Party Experience and Technical Capacity

The MSP is an established operator whose retail back-office systems and services are already in use by multiple licensed electricity retailers. The MSP has operated in the NEM for more than ten years. Its retail operations platform is purpose-built for the Australian NEM and is currently used by five active licensed electricity retailers. The provider has extensive demonstrated capability in: NEM retail processes including MSATS customer transfers, B2B transactions and market settlement; AEMO e-Hub market procedures; interval meter data management; invoice generation, payment processing and debt management; and network tariff management and AEMO settlement reconciliation. Evidence of the MSP's technical capacity is provided in Attachments 44a and 44b (Confidential – not included in public version).

7.4 Controls Ensuring Compliance

Yurringa Energy's control framework with respect to ensuring compliance is documented in the Third Party Contract RM Framework and includes;

- CEO and General Manager Retail oversight of all outsourced activities
- Contractual SLAs with defined performance metrics and remediation obligations
- Integration of MSP performance into Yurringa Energy's Risk Management Framework and Risk Register
- Weekly, monthly and quarterly monitoring and governance meetings
- Independent access to operational dashboards and AEMO settlement data
- Contractual audit rights exercisable annually or following any compliance incident
- Formal escalation protocol for compliance breaches or service failures

Level of Engagement and Internal Oversight

The General Manager Retail is the nominated internal owner for all MSP engagement and oversight. This role has day-to-day accountability for the MSP relationship and reports to the CEO. The following describes the governance structure for MSP oversight:

Oversight Activity	Frequency	Responsible Officer
Operational performance review (SLA compliance, error rates, exception reporting)	Weekly	General Manager Retail
Formal governance meeting with MSP (performance dashboard, issues log, upcoming changes)	Monthly	General Manager Retail + CEO
Compliance audit of MSP processes against NERL/NERR requirements	Quarterly	General Manager Retail + external compliance advisor
Board/Risk Management Committee report on MSP performance and risk	Bi-monthly	CEO to Board Risk Management Committee
Contractual review and SLA renegotiation	Annual	CEO + General Manager Retail
Incident/breach investigation (MSP-related)	As required (within 24 hours of identification)	General Manager Retail, escalated to CEO

Tools and Systems Used for MSP Oversight

Yurringa Energy uses the following tools and systems to monitor, test and oversee the MSP's performance and compliance. Key oversight activities include:

- Shared operational dashboard — the MSP provides Yurringa Energy with real-time access to a shared operational dashboard displaying key performance indicators including: transfer success rates, billing accuracy rates, meter data exception rates, and open issue/defect counts
- Exception reporting — automated exception reports generated by the MSP's billing and market systems are reviewed daily by the General Manager Retail
- SLA performance reporting — monthly SLA performance reports provided by the MSP against contracted service level metrics, reviewed and retained by Yurringa Energy
- AEMO market data reconciliation — Yurringa Energy independently reconciles MSP-processed settlement data against AEMO market settlement statements to verify accuracy

- Customer complaint log — all customer complaints (regardless of whether arising from MSP activity) are recorded in Yurringa Energy's complaint management system. Any complaint with a potential MSP root cause is flagged for MSP investigation and response
- Audit rights — Yurringa Energy retains contractual rights to conduct or commission independent audits of the MSP's processes, systems and compliance activities. At minimum, an audit will be conducted annually and following any material compliance incident

8. Business Plan

Yurringa Energy's Strategic Business Plan covers the period 2024–2027 and addresses all elements required by the AER Guideline including strategic direction, operating forecasts, customer growth assumptions, revenue and expense projections, and cash flow analysis.

Strategic Objectives:

- Obtain full retailer authorisation and register as an AEMO Market Customer by July 2026
- Retain and expand the existing C&I customer base in VIC, QLD and SA
- Enter the NSW and ACT markets within 12 months of authorisation
- Achieve cash-flow positive operations within 24 months of authorisation
- Grow to a sustainable portfolio of 30–50 large C&I accounts within three years
- Develop renewable energy procurement and PPA products for customers

Target Market Entry:

Yurringa Energy being granted a Retail Authorisation will enable corporations and authorities to deliver on social procurement mandates immediately. Yurringa Energy is a 100% Indigenous-owned and led energy retailer committed to advancing social procurement, sustainability and energy equity across the NEM. The target market will be:

- All customers must consume >100 MWh pa (Large Customers only)
- Government agencies and corporations with social procurement or RAP obligations
- Infrastructure and construction projects requiring project-based electricity supply
- Customers seeking renewable energy content and carbon reduction solutions

9. Compliance Strategy

Yurringa Energy has developed a comprehensive Compliance Management Framework. The key documents comprising this framework are listed below. All documents are consistent with one another and with the operational and governance arrangements described throughout this application:

Document	Attachment	Purpose
Compliance Policy	18	Board-approved policy establishing compliance objectives, obligations, governance and culture
Compliance Procedure	19	Operational procedure for compliance monitoring, recording, reporting and breach management
Code of Conduct	24	Standards of ethical conduct for all staff and officers
Customer Complaints and Dispute Resolution Policy	8	Complaint handling in accordance with AS ISO 10002-2006
Customer Hardship Policy	28	Hardship obligations (available if Small Customers are ever supplied)
Privacy Policy	26	Privacy Act 1988 (Cth) and energy law privacy obligations
Connection and Disconnection Workflow	9	Prescribed procedures for connection, disconnection and reconnection
Disconnection Approval Process	10	Internal approval requirements before any disconnection is actioned
Wholesale Risk Management Policy	4	Wholesale energy procurement risk and financial risk management

9.1 Understanding of Regulatory Obligations

Yurringa Energy has a thorough working understanding of all obligations imposed on authorised retailers under the NERL, NERR and applicable jurisdictional energy legislation. This understanding has been developed through the company's existing live operations under a retail exemption since July 2024, recruitment of experienced energy sector personnel, and specialist regulatory advice.

Key regulatory obligations understood and operationally addressed by Yurringa Energy include:

- Customer retail contracts — negotiated contracts for Large C&I customers compliant with NERL and NERR requirements
- Billing — accurate and timely billing in accordance with NERR requirements and contracted terms
- Disconnection and reconnection — compliance with prescribed procedures and disconnection approval process
- Explicit Informed Consent — for NERR Rule 5 aggregation and for all consent-based activities
- Privacy and data obligations — Privacy Policy in place
- AER performance reporting — obligations under the AER Performance Reporting Procedures and Guidelines understood and operationalised
- Energy ombudsman obligations — membership applications lodged in all target jurisdictions
- AEMO market obligations — registration as Market Customer, prudential compliance and settlement

9.2 Compliance Management System

Yurringa Energy uses the following compliance management system and tools:

Compliance Register and Obligations Library:

Yurringa Energy maintains a live Compliance Register (incorporated into the broader Risk Register and a separate Compliance Procedures and Guidelines Reporting Template. The Obligations Library catalogues every applicable obligation under the NERL, NERR, applicable jurisdictional legislation and AER guidelines, mapped to: the responsible staff member; the process or control that addresses the obligation; the monitoring/testing method; and the reporting frequency.

Compliance Management Software:

Day-to-day compliance tracking is managed by the General Manager Retail using a purpose-built compliance register and issue-tracking system. The system records identified compliance issues, assigns owners, tracks remediation progress and generates overdue alerts. All compliance records are retained for a minimum of seven years in accordance with the NERL.

Compliance Monitoring and Testing:

Monitoring/Testing Activity	Frequency	Responsible Officer
Review of obligations library against any NERL/NERR/guideline amendments	Quarterly (or upon notification of change)	General Manager Retail
Self-assessment against AER compliance audit checklist	Six-monthly	General Manager Retail + external compliance advisor
Billing accuracy spot-checks (sample review of customer invoices)	Monthly	General Manager Retail
MSP market transaction audit (sample of MSATS transfers, energisations)	Monthly	General Manager Retail
Complaint register review and trend analysis	Monthly	General Manager Retail
Full compliance audit (internal or external)	Annually	External compliance auditor (commissioned by CEO)
Board compliance report (summary of issues, remediations, audit outcomes)	Quarterly	CEO to Board Risk Management Committee

9.3 Staff Compliance Training Program

All Yurringa Energy staff with responsibilities under the NERL and NERR are required to complete compliance training as follows:

Training Module	Audience	Frequency
NERL/NERR Obligations Induction — overview of retailer authorisation obligations, prohibited conduct and complaint handling	All staff	On commencement and annually

Training Module	Audience	Frequency
Large Customer and NERR Rule 5 Aggregation — procedures for onboarding, consent and contract compliance	Customer & Operations, Business Services	On commencement and when NERR is amended
Disconnection and Reconnection Procedures — prescribed procedures, approval requirements and prohibited disconnection circumstances	Customer & Operations	On commencement and annually
Privacy and Explicit Informed Consent — obligations under the Privacy Act and NERR	All staff	On commencement and annually
Wholesale Market Obligations — AEMO registration, prudential requirements, market participation rules	CEO, General Manager Retail, Executive Chair	On commencement and annually
Compliance Breach Identification and Reporting — how to identify, record, escalate and remediate compliance issues	All staff	On commencement and six-monthly refresher
Code of Conduct and Ethical Standards	All staff	On commencement and annually

A Training Register is maintained by the General Manager Retail, People & Culture, recording each staff member's training completion dates, assessment outcomes and any identified capability gaps. The Training Register is reviewed by the CEO six-monthly and reported to the Risk Management Committee.

9.4 Individual Staff Compliance Responsibilities

Role	Primary Compliance Responsibilities	Reporting To
Board of Directors	Ultimate accountability for compliance culture and	—

Role	Primary Compliance Responsibilities	Reporting To
	governance. Approves Compliance Policy. Reviews compliance reports quarterly.	
Risk Management Committee	Oversight of risk and compliance framework effectiveness. Reviews compliance audit outcomes. Escalation point for material breaches.	Board
Chief Executive Officer (Arron Wood)	Accountable for all AER reporting obligations. Approves material compliance decisions. Ensures compliance systems are adequately resourced. Notifies AER of material breaches.	Board
General Manager Retail (Fiona Savage)	Day-to-day operation of the compliance register and obligations library. MSP oversight. Billing and market transaction compliance. Customer complaint escalation. Breach identification and initial investigation.	CEO
General Manager, People & Culture (Shane Wilkins)	Compliance training program delivery and Training Register maintenance. Capability gap identification and remediation.	CEO
Business Services Manager (Martin Walton)	Compliance in customer acquisition and contracting — explicit informed consent, contract disclosure obligations, NERR Rule 5 aggregation consent procedures.	CEO
Managed Service Provider	Compliance with all contracted back-office obligations. Provides exception reports, SLA reports and audit cooperation. Escalates identified compliance risks to General Manager Retail within 24 hours.	General Manager Retail

9.5 Compliance Breach Management — Worked Examples

Yurringa Energy's Compliance Procedure sets out the full breach management process. The following worked examples illustrate how a compliance breach would be identified, assessed, escalated, remediated and reported:

Example 1: Late Bill Issue (NERR Billing Obligation)

Scenario: The General Manager Retail identifies during a monthly billing audit that three Large Customer invoices were issued two days outside the contracted billing cycle due to an MSP system error.

- Step 1 — Identification: Issue identified during monthly billing spot-check by General Manager Retail. Recorded in the Compliance Register with date, description and estimated impact.
- Step 2 — Assessment: General Manager Retail assesses the breach against the NERR billing requirements and the customer contract terms. Determines whether the breach is material (considers frequency, impact, whether customers suffered loss).
- Step 3 — Escalation: If assessed as material, the CEO is notified within 24 hours. The CEO determines whether AER notification is required under the AER Performance Reporting Procedures and Guidelines.
- Step 4 — Remediation: MSP is directed to correct the billing error and reissue invoices within 24 hours. MSP is required to provide a root cause analysis and corrective action plan within five business days.
- Step 5 — Monitoring: The General Manager Retail increases billing audit frequency for the following month to verify the corrective action has been effective.
- Step 6 — Reporting: The breach, remediation and corrective action outcome are recorded in the Compliance Register and reported to the Board Risk Management Committee at its next quarterly meeting.

Example 2: NERR Rule 5 Aggregation — Missing Explicit Informed Consent

Scenario: During a quarterly compliance self-assessment, the General Manager Retail identifies that a customer onboarded under NERR Rule 5 aggregation did not have a signed Explicit Informed Consent form recorded for two of its five small-consumption sites.

- Step 1 — Identification: Identified during quarterly self-assessment review of NERR Rule 5 customer files. Recorded in Compliance Register.
- Step 2 — Assessment: Assessed as a material breach of NERR Rule 5 requirements, as supply to those sites without recorded consent may not be lawful under the NERR.

- Step 3 — Escalation: CEO notified immediately. External compliance advisor engaged to provide advice on whether supply should be suspended pending rectification and whether AER notification is required.
- Step 4 — Remediation: Business Services Manager contacts the customer to obtain signed Explicit Informed Consent forms within 48 hours. Supply continues only once consent is documented.
- Step 5 — Systemic review: General Manager Retail conducts a full audit of all NERR Rule 5 customer files to identify any other instances. Onboarding checklist updated to include mandatory consent verification step.
- Step 6 — Reporting: Full breach report prepared and provided to the AER if required. Outcome recorded in Compliance Register and reported to Board Risk Management Committee.

9.6 NERL and NERR Obligations Not Applicable to Yurringa Energy

As Yurringa Energy supplies exclusively Large Customers (>100 MWh pa), a number of obligations under the NERL and NERR that apply to retailers supplying Small Customers do not apply to Yurringa Energy's current operations. These are identified below for clarity, with the applicable regulatory reference.

Yurringa Energy acknowledges that should it ever supply Small Customers in the future, all of the obligations listed below would become applicable, and all systems and policies required to meet those obligations would need to be in place before any such supply commenced.

Obligation / Requirement	NERL / NERR Reference	Application to Yurringa Energy
Standing offer obligation — obligation to publish and supply on standing offer terms	NERL s.20, NERR r.22–24	DOES NOT APPLY — Yurringa Energy supplies Large Customers only on negotiated contracts. No standing offer required.
Standard Retail Contract terms (prescribed terms for Small Customers)	NERL s.22, NERR r.47–70	DOES NOT APPLY — Yurringa Energy uses negotiated Market Retail Contracts for Large Customers. NERR prescribed Small Customer standard terms do not apply.
Hardship program obligations (mandatory hardship policy, assistance and	NERL s.43–52, NERR r.28–42	DOES NOT APPLY currently — Yurringa Energy supplies Large Customers only. A Hardship Policy (has been prepared in readiness

Obligation / Requirement	NERL / NERR Reference	Application to Yurringa Energy
payment plans for residential customers in financial difficulty)		should Small Customers ever be supplied.
Life support equipment obligations (special protections for customers dependent on life support equipment)	NERL s.116A, NERR r.124–126	DOES NOT APPLY — Large C&I and commercial/industrial customers do not rely on life support equipment. Procedures would be required if residential or Small Customers were ever supplied.
Concession and rebate pass-through obligations	Jurisdictional legislation	DOES NOT APPLY — Concession and rebate schemes apply to residential and eligible Small Customers only. Yurringa Energy's Large Customers are not eligible.
Deemed customer status and 'move-in' customer obligations	NERL s.38–42, NERR r.44–46	DOES NOT APPLY in standard form — Yurringa Energy actively contracts with all customers. However, Yurringa Energy maintains awareness of deemed customer provisions and will manage any such situations on their merits.
Residential customer marketing rules (unsolicited contact, cooling-off rights for door-to-door and telemarketing)	NERL s.69–87, NERR r.72–100	DOES NOT APPLY — Yurringa Energy does not market to residential customers. All sales are B2B negotiated arrangements with Large C&I customers.
Small Customer billing protections (e.g. pay-on-time discounts, benefit period obligations, back-billing limits beyond 9 months)	NERR r.25B, r.27, r.57	DOES NOT APPLY — Yurringa Energy's Large Customer contracts are individually negotiated. NERR prescribed Small Customer billing protections do not apply.
Retailer energy efficiency obligations (Small Customer energy	Jurisdictional legislation	DOES NOT APPLY — Scheme-specific obligations relating to Small Customer energy efficiency do not apply to Large Customer supply.

Obligation / Requirement	NERL / NERR Reference	Application to Yurringa Energy
efficiency requirements)		

> *NERR Rule 5 — Aggregation: Where a Large Customer's portfolio includes individual premises consuming <100 MWh pa, Yurringa Energy WILL apply NERR Rule 5. In such cases, the explicit informed consent requirements of NERR Rule 5 DO apply and are addressed in Yurringa Energy's onboarding process and compliance framework.*

9.7 Complaints and Dispute Resolution

Yurringa Energy's Customer Complaints and Dispute Resolution Policy has been developed in accordance with AS ISO 10002-2006. Membership applications for energy ombudsman schemes have been initiated in all target jurisdictions:

- Energy & Water Ombudsman NSW (EWON)
- Energy & Water Ombudsman SA (EWOSA)
- Energy & Water Ombudsman Queensland (EWOQ)
- ACT Civil & Administrative Tribunal (ACAT)

10. Risk Management Strategy

Yurringa Energy's Risk Management Framework has been designed in accordance with the Australian Standard AS ISO 31000:2018 Risk Management — Guideline. Risk management is embedded in all business processes and operations.

10.1 Governance and Accountability

The Board of Directors has ultimate accountability for risk management. The Risk, Compliance and Audit Committee (Board sub-committee) provides oversight of the framework's effectiveness. The CEO has day-to-day accountability for risk management operations.

Governance Body	Risk Management Responsibilities	Reporting Frequency
Board of Directors	Approves Risk Policy and Risk Appetite Statement. Reviews material risks annually. Escalation point for extreme risks.	Annually (full review) + as escalated
Risk Management Committee	Oversees Risk Register and framework effectiveness. Reviews	Quarterly

Governance Body	Risk Management Responsibilities	Reporting Frequency
	risk reports. Recommends risk appetite changes to Board.	
Chief Executive Officer	Owns the Risk Register. Ensures risk framework is operational. Reports to Risk Management Committee. Escalates extreme/high risks.	Quarterly to Committee
General Manager Retail	Manages operational, compliance and MSP-related risks. Updates Risk Register for operational risk events.	Monthly (to CEO) + as events arise

10.2 Risk Appetite and Tolerance Thresholds

The Risk Appetite Statement (Attachment 15, Confidential – not included in public version) sets out the Board's approved risk tolerances for each risk category. The following table summarises the risk appetite by category:

Risk Category	Risk Appetite / Tolerance	Key Controls
Regulatory and compliance risk (failure to meet NERL/NERR obligations)	ZERO TOLERANCE — No appetite for deliberate or systemic compliance breaches. The Board expects full compliance at all times. Any compliance breach is treated as a priority issue requiring immediate remediation and CEO escalation.	Compliance Policy, Compliance Procedure, Obligations Library, compliance audits, staff training, external compliance advisor.
Wholesale market price risk (exposure to spot price volatility)	LOW — During the initial operating period, Yurringa Energy maintains LOW appetite for unhedged wholesale price exposure. All large customer supply will be covered by 'whole of meter' wholesale supply arrangements with established generators.	Wholesale Risk Management Policy (Att. 4), supply arrangements with 3 generators (negotiations advanced), no direct spot exposure in initial period.

Risk Category	Risk Appetite / Tolerance	Key Controls
	Yurringa Energy will not trade directly on the ASX Energy spot market during the initial authorised period. Wholesale electricity will be procured on an Over The Counter (OTC) basis through bilateral 'whole of meter' supply agreements with established NEM-registered generators and gentailers. This means the wholesale price risk on all customer load is borne by the wholesale counterparty, not by Yurringa Energy, during the initial operating period. Fiona Savage (General Manager Retail), supported by Domenic Capomolla (Non-Executive Director and Advisor), is the team member responsible for negotiating and managing wholesale electricity purchasing contracts. Ms Savage has over 22 years of experience in C&I and mass market electricity retailing, including wholesale procurement, NEM settlement, pricing strategy and risk mitigation. Mr Capomolla has over 25 years of executive experience in energy retail, including wholesale procurement at multiple licensed electricity retailers. Negotiations with three wholesale counterparties are at an advanced stage. ISDA, KYC	

Risk Category	Risk Appetite / Tolerance	Key Controls
	and AML documentation has been exchanged with two of the three counterparties. Additional wholesale supply agreements are expected to be executed by 31 Dec 2026.	
Operational risk (MSP failure, system error, process failure)	LOW-MEDIUM — Yurringa Energy accepts that some operational incidents will occur in any business. The tolerance is for isolated, rapidly remediated incidents. Systemic or repeated failures are not tolerated.	MSP contractual SLAs, weekly/monthly performance monitoring, audit rights, escalation protocols, operational dashboards.
Financial/liquidity risk (insufficient capital to meet obligations)	LOW — Yurringa Energy maintains a minimum liquidity buffer of [X months' operating expenses] at all times. AEMO prudential requirements set the minimum capital floor.	Conservative financial forecasts, secured startup funding (24 months), AEMO prudential compliance, quarterly financial reporting to Board.
Reputational risk (harm to brand, Indigenous ownership mission or stakeholder relationships)	LOW — Given Yurringa Energy's unique position as Australia's first Indigenous-owned retailer, reputational risk is accorded high priority.	Code of Conduct, governance policies, ethical sourcing, transparent reporting, community engagement.
RoLR (Retailer of Last Resort) event risk	ZERO TOLERANCE — The Board will not accept actions or inactions that could give rise to a RoLR event. This is a fundamental governance obligation.	Controlled customer acquisition, conservative financial assumptions, AEMO prudential compliance, quarterly financial and risk reporting to Board.

10.3 Risk Management Framework Lifecycle

Yurringa Energy's Risk Management Framework operates on the following lifecycle:

- Identify — Risk identification is a continuous process. All staff are responsible for identifying and reporting new risks. Formal risk workshops are conducted six-monthly.
- Assess — Each identified risk is assessed for likelihood and consequence using the risk assessment matrix in the Risk Policy. Risks are rated as Extreme, High, Medium or Low.
- Treat — Risk treatments (controls) are assigned for each risk, with a named owner and due date. Residual risk is assessed after controls are applied.
- Monitor and Review — The Risk Register is reviewed monthly by the CEO and quarterly by the Risk Management Committee. The full Risk Policy and Risk Appetite Statement are reviewed annually by the Board.
- Report — Risk reporting follows the governance schedule in Section 10.1 above.

Key Risk Management Framework documents are provided in: Risk Policy, Confidential, Risk Register, Confidential, Risk Appetite Statement, Risk, Compliance and Audit Committee Charter, Confidential, Wholesale Risk Management Policy, Confidential.

10.4 Risk Map

The full risk map, including identified inherent risks, assessed likelihood, consequence and residual risk ratings, and associated stress test linkages, is contained in Attachment 14 (Risk Register, Confidential – not included in public version). The following table summarises the key risks inherent in Yurringa Energy's proposed retail operations, their assessed likelihood and impact, and the primary controls applied. Risks are rated on a four-level scale (Extreme, High, Medium, Low) using the risk assessment matrix.

Risk 1 — NERL/NERR compliance failure (Inherent: High likelihood, Extreme impact; Residual after controls: Low likelihood, High impact). Key controls: Compliance Management Framework, Obligations Library, compliance monitoring program, staff training, external compliance advisor, breach management procedure. Stress test linkage: Stress Tests 1–4 all assume continued full NERL/NERR compliance; the Board has zero tolerance for deliberate or systemic compliance failure.

Risk 2 — Wholesale price risk / unhedged spot exposure (Inherent: Medium likelihood, High impact; Residual after controls: Low likelihood, Low impact). Key controls: OTC ‘whole of meter’ supply arrangements transferring wholesale price risk to counterparty; Wholesale Risk Management Policy; Board-level oversight. Stress test linkage: Stress Tests 3 and 4 model adverse wholesale price scenarios; OTC arrangements substantially mitigate direct exposure. Yuringa Energy is procuring energy via ‘meter following’ hedges and hence is immune to spot price risk. **Stress Tests 4 is not relevant as a result.**

Risk 3 — MSP operational failure (Inherent: Medium likelihood, High impact; Residual after controls: Low likelihood, Medium impact). Key controls: Contractual SLAs with remediation obligations; weekly performance monitoring; audit rights; escalation protocols; operational dashboards; MSP oversight by General Manager Retail. Stress

test linkage: Stress Test 2 (accelerated growth) increases reliance on MSP capacity — MSP contract includes scalability obligations.

Risk 4 — Liquidity / capital adequacy risk (Inherent: Medium likelihood, High impact; Residual after controls: Low likelihood, Low impact). Key controls: Secured capital ($4.6m total: InvestVIC grant, capital raise, CBA overdraft); minimum liquidity buffer policy; quarterly financial reporting to Board; AEMO prudential compliance. Stress test linkage: All four stress scenarios modelled against available capital — liquidity confirmed adequate in all scenarios.

Risk 5 — RoLR event risk (Inherent: Low likelihood, Extreme impact; Residual after controls: Very low likelihood, Extreme impact). Key controls: Controlled customer acquisition; conservative financial assumptions; AEMO prudential compliance; Board zero-tolerance policy. The Board has an absolute zero-tolerance risk appetite for any action or inaction that could give rise to a RoLR event.

Risk 6 — Reputational risk (Inherent: Low likelihood, High impact; Residual after controls: Very low likelihood, Low impact). Key controls: Code of Conduct; governance policies; ethical sourcing; transparent stakeholder reporting.

Risk 7 — Key person dependency (Inherent: Medium likelihood, Medium impact; Residual after controls: Low likelihood, Low impact). Key controls: Cross-training of operational staff; MSP provides operational continuity for back-office functions; succession planning discussed at Board level annually. This risk map is proportionate to the size, operating model and complexity of Yurringa Energy's proposed retail operations. The company is a start-up targeting a small number of large C&I customers in a controlled growth phase. The risk map will be reviewed and updated six-monthly, or upon any material change in the business.

11. External Assurance

Yurringa Energy's risk management and compliance strategies are currently subject to external assurance by suitably qualified and independent entities, consistent with the AER Retailer Authorisation Guideline requirement. The assurance process was expected to be concluded prior to submission of this application and to cover the adequacy, completeness and practical operability of all key risk and compliance documents. The external assurance is to be provided by an independent legal counsel with specialist energy regulatory and corporate governance expertise, engaged to review all governance, constitutional and Board-level documents; (b) An independent compliance advisory firm specialising in energy retail regulatory compliance, engaged to review the Compliance Management Framework, Compliance Procedure, and Obligations Library against the requirements of the NERL, NERR, and AER Retailer Authorisation Guideline; and (c) an independent risk management consultant with demonstrated expertise in energy sector risk frameworks, engaged to review the Risk Policy, Risk Register and Risk Appetite Statement. All documents to be reviewed by external assurers will be revised to address their finding. All key governance, risk and compliance documents will be formally approved by the Board of Directors following the external assurance process.

- Compliance Management Framework Policy and Compliance Procedure (reviewed by external compliance specialist
- Risk Management Framework, Risk Policy and Risk Register reviewed by external advisors
- Board Charter and Company Constitution reviewed by external legal counsel
- All key governance, risk and compliance documents formally approved by the Board of Directors

12. Additional Information — Risk and Customer Interests

- Standard retail contract terms for Large C&I customers
- Customer Complaints and Dispute Resolution Policy
- Customer Hardship Policy
- Privacy Policy
- Code of Conduct
- Connection and Disconnection Workflow
- Disconnection Approval Process)

13. Energy Ombudsman Scheme Membership

Applications initiated with EWON (NSW), EWOSA (SA), EWOQ (QLD) and ACAT (ACT). Formal membership will be in place before retail operations commence in each jurisdiction.

14. Market Participant Arrangements

AEMO Market Customer registration: in progress. ASX Austraclear: application in preparation. Distribution businesses: engagement commenced. Wholesale supply: Yurringa Energy will procure wholesale electricity on an OTC basis through bilateral 'whole of meter' supply agreements. Yurringa Energy will NOT trade directly on the ASX Energy spot market during the initial authorised period. Negotiations with three wholesale counterparties are at an advanced stage. Indicative pricing terms have been agreed in principle with two counterparties, with Heads of Agreement exchanged. Evidence of these negotiations is provided in Attachment 53 (Confidential – not included in public version). All wholesale supply agreements are expected to be executed prior to commencement of authorised retail operations.

14.a Embedded Networks

Yurringa Energy is NOT selling energy to embedded networks.

PART B — FINANCIAL CAPACITY

The AER Guideline requires the AER to be satisfied that prospective retailers have, or have access to, adequate financial capacity to support their planned retail operations. Yurringa Energy's financial capacity assessment addresses both its current financial position and its projected financial position.

1. Audited Financial Reports

Audited financial statements for FY2025 and FY2025 profit and loss have been provided to the AER. All documents contain required Australian Accounting Standards financial statements and notes. The auditor's independence declaration (s.307C Corporations Act 2001) is included in Attachment 28a.

2. Credit Rating

Yurringa Energy does not currently hold a formal external credit rating, as is common for start-up energy retailers. Financial capacity is demonstrated through audited accounts, statutory and independent declarations, and the financial model.

3. Current Financial Position

Yurringa Energy's current financial position is evidenced by: Audited financial statements FY2025; FY2025 P&L; going concern statutory declaration; and independent accountant's declaration. Startup funding has been secured for at least 24 months post-authorisation. Interim financial statements for the nine-month period 1 July 2025 to 31 March 2026. These documents confirm that the company is solvent and trading as a going concern, the balance sheet has been materially strengthened through a recently concluded capital raise, an InvestVIC grant has been partially received with a further tranche due, and there are no material adverse changes to the company's financial position since the FY2025 audited statements.

4. Group Structure and Support Arrangements

Ownership structure, shareholder register and support arrangements are provided.

5. Going Concern Declaration

CEO statutory declaration confirming going concern and 12-month funding capacity is provided.

6. Independent Auditor / Financial Institution Declaration

Independent accountant's declaration confirms: no insolvency official has been appointed, no winding-up resolution or application has been made, and the company is unaware of any other factor that would impede its ability to finance its energy retail activities.

7. Bank Guarantees and Access to Additional Capital

Secured startup funding meets AEMO prudential requirements and operational liquidity needs for at least 24 months post-authorisation. The Financial Model (Attachment 30, Confidential) incorporates all four AER-mandated stress test scenarios and demonstrates that available funding is sufficient to sustain operations and service all existing and planned customers across each scenario over the full three-year forecast horizon. Detailed monthly P&L, cash flow and balance sheet projections for all four stress test scenarios have been provided as has evidence of available capital.

8. Forecast Revenue and Expenses

Detailed financial forecasts have been provided and have been based on conservative assumptions. Forecasts are consistent with the business plan and highlight all key risks. The Financial Model includes a baseline scenario and the four AER-mandated stress test scenarios, each presented as monthly P&L, cash flow and balance sheet projections for the three-year period July 2026 to June 2029. All key assumptions are separately listed in the Financial Model.

Stress Test 2 — [redacted]

Stress Test 3 — [redacted]

Stress Test 4 – [redacted]

For all four scenarios, evidence of access to additional capital has been provided.

9. Additional Financial Information

- Financially viable — evidenced by audited accounts, declarations and forecasts
- No history of insolvency or disqualifying events
- Will meet all AEMO prudential requirements as a registered Market Customer
- Adequate capital secured for initial operating period of at least 24 months

- Financial management subject to Board oversight via the Risk Management Committee

10. Capital Raise Program update

Yurringa Energy commenced operations with grant funding from InvestVIC. That initial grant has now been fully expended. Yurringa Energy has secured a further grant from InvestVIC. Yurringa Energy has secured the necessary funding to support its business case from the following sources:

a. Grant Funding – InvestVIC

Yurringa Energy has been established with the help of grant funding from the Victorian Department of Jobs, Skills, Industry and Regions - INVESTVIC. Initial funding was committed in July 2024. This grant has now been fully expended.

A further amount has been secured in 2026 to support purchase of the billing system and operations. This has been received in January 2026, with a further amount due in July/Aug 2026.

Requirements to fulfil the current Invest Vic grant are the purchase and implementation of a billing system, resulting in securing our ESC retail energy license.

b. Investment

Yurringa Energy undertook a capital raise, with the round concluding in April 2026. The round was completed successfully.

Investors in the capital raise include Indigenous Land Councils and private investors. Details are contained in the executed shareholder agreements (Attachment 52, Confidential – not included in public version).

c. Debt Funding

In addition to grant funding, Yurringa Energy has executed a debt funding overdraft facility with Commonwealth Bank of Australia.

PART C — SUITABILITY CRITERION

1. Compliance History

Yurringa Energy Pty Ltd, its directors and associated entities:

- Have not had any licence or authorisation revoked or refused in any industry
- Have not been subject to enforcement action, infringement notices or voluntary administrative undertakings in the past 10 years; acknowledging the information in the updated declarations as provided.
- Have not triggered, or been likely to trigger, the RoLR provisions of the NERL or equivalent legislation; acknowledging the information in the updated declarations as provided.
- Have operated under an AER retail licence exemption since July 2024 with no compliance breaches or customer complaints

2. Offences and Prosecutions

Neither the company nor its officers have been convicted of, or successfully prosecuted for, any offence under the ASIC Act 2001 (Cth), Competition and Consumer Act 2010 (Cth), Corporations Act 2001 (Cth) or any other relevant Commonwealth, state, territory or foreign legislation. This confirmation applies to the company itself and to all current directors and officers, including: Daniel Briggs (Executive Chair), Domenic Capomolla (Non-Executive Director and Advisor), Natalie Gurman (Non-Executive Director), Arron Wood (Chief Executive Officer) Written statutory declarations to this effect have been provided.

3. Criminal History Checks

Criminal history checks have been conducted for all persons listed in Section C.2 above. All checks were completed within the past 12 months and confirm no relevant criminal history for any listed person. Criminal history check documentation has provided.

4. Bankruptcy and Director Disqualification Declarations

No officer of Yurringa Energy has been disqualified from managing corporations or been declared bankrupt in any jurisdiction, including any overseas jurisdiction. Signed statutory declarations from the Chief Executive Officer confirming these matters have been provided.

5. Names and Addresses of Officers

The full legal names of all officers of Yurringa Energy have been provided to the AER. Current residential addresses have not been included in public version, consistent with the confidentiality claim made in respect of this information.

The officers covered are:

Daniel Briggs (Executive Chair),

Domenic Capomolla (Non-Executive Director and Advisor),

Natalie Gurman (Non-Executive Director),

Daniel Miller (Non-Executive Director),

Justin Hanney (Non-Executive Director),

Paul Guerra (Non-Executive Director),

Kaley Nicholson (Non-Executive Director),

Arron Wood (Chief Executive Officer).

Yurringa Energy requests that this information be treated as strictly confidential by the AER, consistent with its obligations under the National Energy Retail Law and the Competition and Consumer Act 2010 (Cth), and that it not be included in any public version of this application. Residential addresses are personal information within the meaning of the Privacy Act 1988 (Cth) and their public disclosure would cause privacy harm to the individuals concerned without any countervailing public interest benefit.

6. Probity and Competence Policies

Policies and procedures addressing officer probity and competence:

- Code of Conduct — ethical conduct, conflicts of interest and professional behaviour
- Compliance Management Framework — compliance obligations embedded in officer responsibilities
- Board Charter — governance obligations and standards for Board members
- Company Constitution — legal governance framework for the company and its directors
- Risk, Compliance and Audit Committee Charter — governance framework for risk oversight

7. Additional Information on Character and Past Performance

Further information on officers' capabilities, leadership qualities and governance standards has been provided via information containing Senior Leadership CVs, Board Composition, Board Charter, Company Constitution, Code of Conduct, and Financial Statutory Declaration.

Confidentiality Claims

Yurringa Energy claims confidentiality over the following categories of information. A public version of this application has been prepared separately. Yurringa Energy requests that the AER notify it before considering disclosure of any confidential information.

Category	Reason for Claim	Potential Disadvantage
Financial statements, forecasts and financial model	Detailed commercial, cost and revenue information. Disclosure would give competitors insight into cost structure and pricing strategy.	Commercial disadvantage and harm to competitive position.
Shareholder register and ownership structure	Personal information about shareholders and commercially sensitive ownership details.	Privacy harm; potential competitive disadvantage.
Board Charter, Constitution and Board composition	Commercially sensitive governance details and personal information about Board members.	Privacy harm to individuals; governance integrity risk.
MSP identity and service schedule	Commercial-in-confidence service agreement. Disclosure could harm MSP's commercial interests.	Commercial disadvantage; potential MSP contractual breach.
Staff CVs and personal details	Personal information about staff including residential history.	Privacy harm; potential staff retention risk.
Risk Register, Policy, Appetite Statement	Specific risk details and controls. Disclosure could be exploited by competitors.	Commercial disadvantage and operational harm.
Compliance Policy and Procedure)	Operational detail of compliance monitoring and breach management.	Disclosure could undermine effectiveness of compliance controls.

Category	Reason for Claim	Potential Disadvantage
AEMO and distributor correspondence	Commercial-in-confidence negotiations.	Potential harm to ongoing commercial negotiations.
Customer contract terms	Commercially sensitive contract terms.	Direct commercial harm.
Statutory declarations	Personal financial declarations from officers.	Privacy harm to individuals.
Wholesale supply negotiations — Heads of Agreement and indicative pricing	Commercial-in-confidence negotiations and indicative pricing. Disclosure would harm ongoing commercial negotiations and counterparty relationships.	Commercial disadvantage and harm to negotiating position if disclosed prior to execution of agreements.
Interim financial statements and current bank statements	Detailed commercial and financial information. Disclosure would give competitors insight into cost structure, cash position and pricing strategy.	Commercial disadvantage and harm to competitive position.
Full names and residential addresses of all officers	Personal information within the meaning of the Privacy Act 1988 (Cth). No countervailing public interest in disclosure.	Privacy harm to individuals. Residential addresses have no legitimate public interest value.

List of Attachments

All attachments marked 'Confidential' form part of the confidential version only and are not included in this public version of the application. Public attachments are included with this public version.

Ref	Document Title	Classification	Criterion
1	ASIC Registration — Yurringa Energy Pty Ltd	Public	General Particulars
2	Board Composition	Confidential	Org & Technical
3	Organisational Structure Chart	Public	Org & Technical
4	Wholesale Risk Management Policy	Confidential	Risk Management
5	Retail Electricity Contract (Large C&I)	Confidential	Org & Technical
7	Senior Leadership Team CV Summary (expanded)	Confidential	Org & Technical
8	Customer Complaints and Dispute Resolution Policy	Public	Compliance
9	Connection and Disconnection Workflow	Confidential	Compliance
10	Disconnection Approval Process	Confidential	Compliance
11	Risk, Compliance and Audit Committee Charter	Confidential	Risk Management
11a	Sample UoSA	Public	Market Arrangements
11b	DNSP Correspondence	Public	Market Arrangements
12	Board Charter	Confidential	Org & Technical
13	Risk Policy	Confidential	Risk Management
14	Risk Register	Confidential	Risk Management
15	Risk Appetite Statement (incl. tolerance thresholds)	Confidential	Risk Management
16	Ombudsman Scheme Correspondence	Confidential	Compliance
16a	AEMO Communication	Confidential	Market Arrangements

Ref	Document Title	Classification	Criterion
17	Family Violence Policy	Confidential	Compliance
18	Life Support Policy	Confidential	Compliance
19	Compliance Procedure and compliance reporting template	Confidential	Compliance
20	Financial Statements FY2025	Confidential	Financial Capacity
21	Shareholder Register — Yurringa Group Pty Ltd	Confidential	Financial Capacity
22	Strategic Business Plan 2024–2027	Confidential	Financial Capacity
24	Code of Conduct	Confidential	Suitability
25	Correspondence with Electricity Distributors	Confidential	Market Arrangements
26	Privacy Policy	Confidential	Compliance
27	Profit and Loss FY2025	Confidential	Financial Capacity
28	Customer Hardship Policy	Confidential	Compliance
28a	Yurringa Energy Pty Ltd - 2025FY Financial Statements Signed	Confidential	Financial Capacity
29	Financial Statutory Declaration (Signed)	Confidential	Financial Capacity
30	Financial Business Model	Confidential	Financial Capacity
32	No Criminal Offence Declaration	Public	Suitability
33	No Disqualification or Bankruptcy Declaration	Public	Suitability
39	Compliance Management Framework	Public	Compliance
40	Risk Management Policy Framework	Confidential	Compliance
41	Third Party RM Framework	Public	Org & Technical
42	Pricing Policy, Methodologies and Procedures	Confidential	Org & Technical
43	Brave SaaS Platform Agreement	Confidential	Org & Technical
44	DigiU MSA and SOW	Confidential	Org & Technical
45	Yurringa Energy Constitution	Confidential	Compliance

Ref	Document Title	Classification	Criterion
48	Investor Prospectus	Confidential	Financial Capacity
49	Statutory Declaration	Public	Suitability
50	Domenic Capomolla CV	Confidential	Org & Technical
51	Natalie Gurman CV	Confidential	Org & Technical
52	Executed Shareholder Agreement	Confidential	Financial Capacity
53	Interim Financial Statements (Jul 2025 – Mar 2026) incl. P&L, Cash Flow, Balance Sheet	Confidential	Financial Capacity
54	Executed Grant Agreement – Signed by Yurringa Energy and DJSIR	Confidential	Financial Capacity
55	Yurringa Energy Grant Agreement - Executed	Confidential	Financial Capacity

Declaration

Yurringa Energy Pty Ltd submits this revised application for a retailer authorisation to sell electricity under the National Energy Retail Law. This revision incorporates all feedback provided by the AER in April 2026.

We confirm that:

- All information provided in this application is true, accurate and complete to the best of our knowledge and belief as at the date of this application
- We understand that providing false or misleading information in an application for retailer authorisation is a serious offence under the Criminal Code (Cth), with a maximum penalty of 12 months' imprisonment
- We have read and understood the AER Retailer Authorisation Guideline (Version 3, July 2024)
- We understand and accept that the AER may consult with interested stakeholders on this application as required by the National Energy Retail Rules
- We will promptly notify the AER of any material change to the information provided in this application
- We accept that the AER's decision to grant or refuse authorisation is not subject to merits review

Signed on behalf of Yurringa Energy Pty Ltd:

Arron Wood

Chief Executive Officer

Yurringa Energy Pty Ltd

April 2026

Enquiries regarding this application should be directed to:

Name	Arron Wood
Position	Chief Executive Officer
Email	[redacted]
Phone	[redacted]
Address	Level 1, 116 Rokeby Street, Collingwood VIC 3066

ASIC
Australian Securities & Investments Commission

Name: YURRINGA ENERGY PTY. LTD.
ACN: 630 357 103

Date/Time: 02 July 2026 AEST 10:01:05 AM

This extract contains information derived from the Australian Securities and Investments Commission's (ASIC) database under section 1274A of the Corporations Act 2001.

Please advise ASIC of any error or omission which you may identify.

Current Company Extract

EXTRACT

Organisation Details		Document Number
Current Organisation Details		
Name:	YURRINGA ENERGY PTY. LTD.	0EEZ28242
ACN:	630 357 103	
ABN:	88630357103	
Registered in:	Victoria	
Registration date:	03/12/2018	
Next review date:	03/12/2026	
Name start date:	03/12/2018	
Status:	Registered	
Company type:	Australian Proprietary Company	
Class:	Limited By Shares	
Subclass:	Proprietary Company	

Address Details		Document Number
Current		
Registered address:	'Multiply Accountants & Advisors', 645-649 Spencer Street, WEST MELBOURNE VIC 3003	7ECM53390
Start date:	19/12/2023	
Principal Place Of Business address:	[redacted]	5EGD37129
Start date:	10/05/2022	

Contact Address	
Section 146A of the Corporations Act 2001 states 'A contact address is the address to which communications and notices are sent from ASIC to the company'.	
Current	
Address:	PO BOX 420, NORTH MELBOURNE VIC 3051
Start date:	12/12/2023

Officeholders and Other Roles		Document Number
Director		
Name:	DANIEL BRIGGS	5EHH32193
Address:	Not available in this ASIC extract	
Born:	[redacted]	
Appointment date:	03/12/2018	
Name:	JUSTIN HANNEY	7EDY84013
Address:	Not available in this ASIC extract	
Born:	[redacted]	
Appointment date:	31/03/2026	
Name:	DANIEL MILLER	7EDY78181
Address:	Not available in this ASIC extract	
Born:	[redacted]	
Appointment date:	31/03/2026	

Name:	KALEY NICHOLSON	7EDY78181
Address:	Not available in this ASIC extract	
Born:	[redacted]	
Appointment date:	31/03/2026	
Name:	DOMENICO CAPOMOLLA	7EDY78181
Address:	Not available in this ASIC extract	
Born:	[redacted]	
Appointment date:	31/03/2026	
Name:	NATALIE GURMAN	7EDY78181
Address:	Not available in this ASIC extract	
Born:	[redacted]	
Appointment date:	31/03/2026	
Name:	PAUL GUERRA	7EDY78181
Address:	Not available in this ASIC extract	
Born:	[redacted]	
Appointment date:	31/03/2026	

Secretary

Name:	DANIEL BRIGGS	5EHH32193
Address:	Not available in this ASIC extract	
Born:	[redacted]	
Appointment date:	03/12/2018	
Name:	MARTIN WALTON	7EDY78387
Address:	Not available in this ASIC extract	
Born:	[redacted]	
Appointment date:	31/03/2026	

Ultimate Holding Company

Name:	YURRINGA GROUP PTY LTD	9EAB00771
ACN:	677 481 819	

Share Information

Share Structure

Class	Description	Number issued	Total amount paid	Total amount unpaid	Document number
ORD	ORDINARY SHARES	1600000	3000100.00	0.00	7EEB20012

Members

Note: For each class of shares issued by a proprietary company, ASIC records the details of the top 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 top twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

Name: [redacted]
ACN:
Address:

Current Company Extract

YURRINGA ENERGY PTY. LTD.
ACN 630 357 103

Class	Number held	Beneficially held	Paid	Document number
ORD	[redacted]	yes	FULLY	032730415

[redacted]

Class	Number held	Beneficially held	Paid	Document number
ORD	[redacted]	no	FULLY	7EDZ09599

[redacted]

Class	Number held	Beneficially held	Paid	Document number
ORD	[redacted]	no	FULLY	7EDZ59033

[redacted]

Class	Number held	Beneficially held	Paid	Document number
ORD	[redacted]	no	FULLY	7EEB20012

Documents

Note: Where no Date Processed is shown, the document in question has not been processed. In these instances care should be taken in using information that may be updated by the document when it is processed. Where the Date Processed is shown but there is a zero under No Pages, the document has been processed but a copy is not yet available.

Date received	Form type	Date processed	Number of pages	Effective date	Document number
12/12/2023	484B Change To Company Details Change Of Registered Address	12/12/2023	2	12/12/2023	7ECM53390
20/05/2024	484N Change To Company Details Changes To	20/05/2024	2	20/05/2024	9EAB00741

	(Members) Share Holdings				
20/05/2024	484D Change To Company Details Change To Ultimate Holding Company	20/05/2024	2	20/05/2024	9EAB00771
13/03/2026	2205B Notification Of Resolution Relating To Shares Convert Shares Into Larger Or Smaller Number	24/03/2026	4	24/02/2026	032730415
14/04/2026	484E Change To Company Details Appointment Or Cessation Of A Company Officeholder	06/05/2026	3	14/04/2026	7EDY78181
14/04/2026	492 Request For Correction	06/05/2026	2	14/04/2026	7EDY78365
14/04/2026	484E Change To Company Details Appointment Or Cessation Of A Company Officeholder	14/04/2026	2	14/04/2026	7EDY78387
15/04/2026	484E Change To Company Details Appointment Or Cessation Of A Company Officeholder	15/04/2026	2	15/04/2026	7EDY84013
21/04/2026	484 Change To Company Details 484O Changes To Share Structure 484G Notification Of Share Issue 484N Changes To (Members) Share Holdings	21/04/2026	2	21/04/2026	7EDZ09599
27/05/2026	484 Change To Company Details 484O Changes To Share Structure 484G Notification Of Share Issue 484N Changes To (Members) Share Holdings	27/05/2026	2	27/05/2026	7EDZ59033

09/06/2026	484 Change To Company Details 484O Changes To Share Structure 484G Notification Of Share Issue 484N Changes To (Members) Share Holdings	09/06/2026	2	09/06/2026	7EEB20012

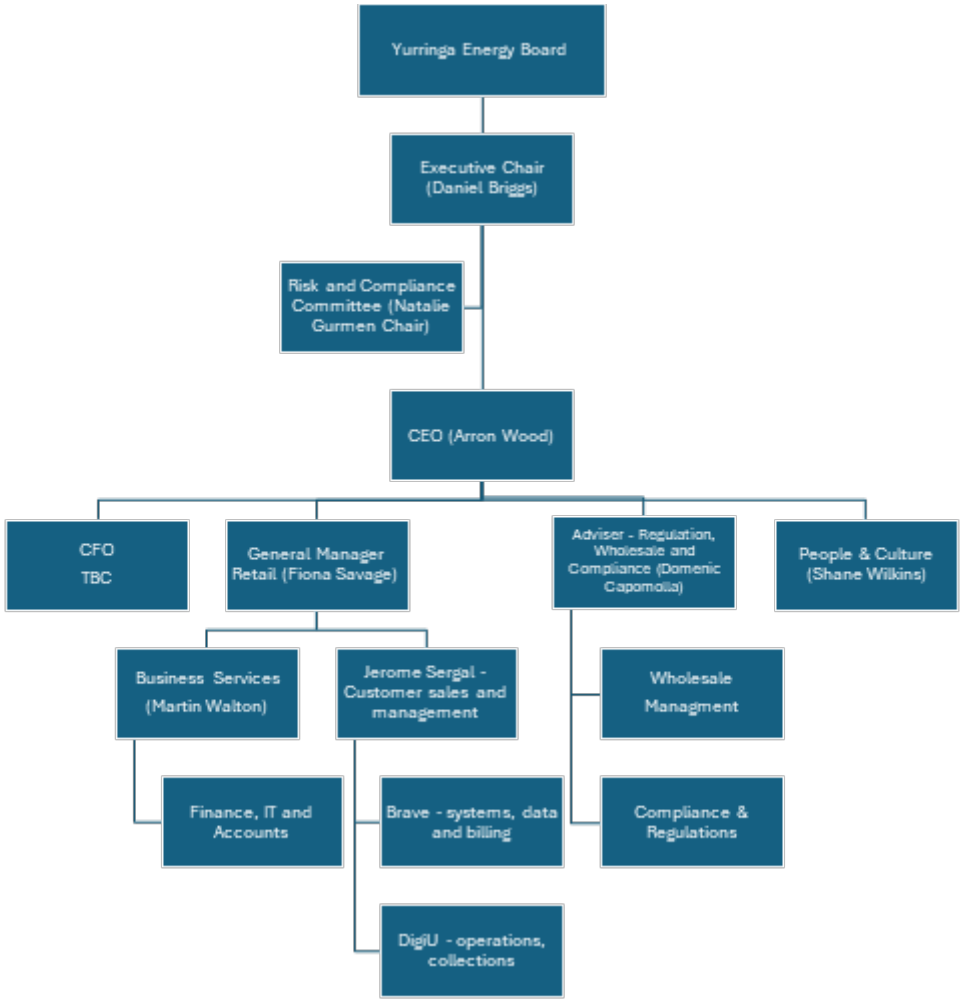
*****End of Extract of 4 Pages*****

Organisational Structure

YURRINGA ENERGY

Attachment 3 - Organisational Structure:

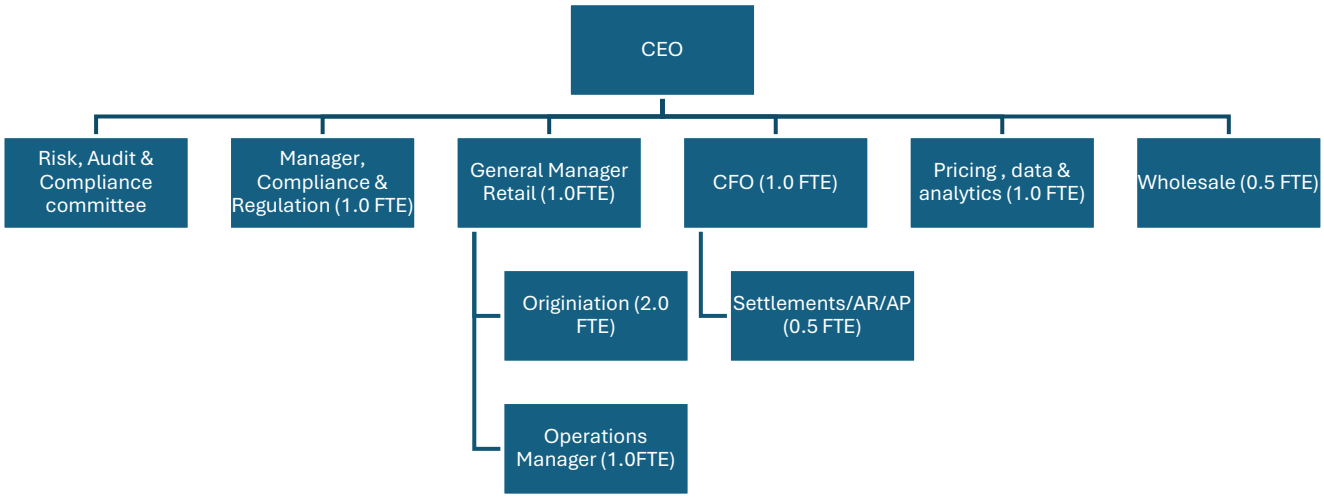
Below is a diagram of Yurringa Energy's organisational structure.



Management Team: Below are the key members of the management team

- Daniel Briggs, Yurringa Energy – Executive Chairman
- Arron Wood, Yurringa Energy – CEO
- CFO – TBC (yet to be appointed)
- Fiona Savage, Yurringa Energy – General Manager Retail
- Jerome Sorgel, Yurringa Energy – Sales and Customer Management
- Domenic Capomolla, Advisor – Regulation, Wholesale and Compliance
- Martin Walton, Yurringa Energy - Business Services
- Shane Wilkins – People & Culture

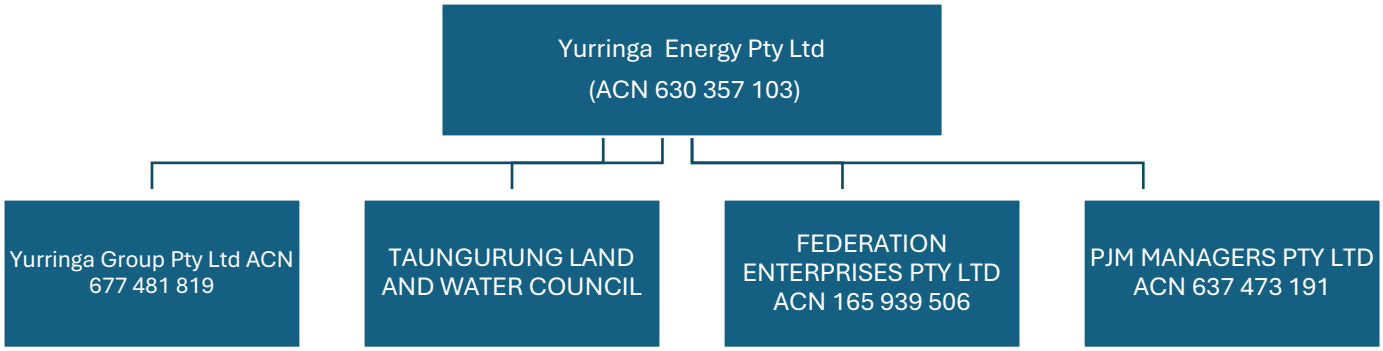
Year 4/5 Organisational structure, load >1GWh per annum



Group Structure

Attachment 3 - Group Structure:

Below is a diagram of Yurringa Energy's group structure.



Shareholding as follows:

Yurringa Group Pty Ltd [redacted]

Taungurung Land and Water Council [redacted]

Federation Enterprises Pty Ltd [redacted]

PJM Managers Pty Ltd [redacted]

21st May 2026 Our Ref: 1071-42

Arron Wood
Silver Asset Services Pty Ltd
Level 1, 116 Rokeby Street,
Collingwood VIC 3066

Dear Arron,

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

Further to Shared Safety and Risk's independent audit of Yurringa Energy Pty Ltd's compliance and risk management systems in May 2026, I can confirm that we have reviewed Yurringa Energy Pty Ltd's audit response and verified completion of the recommended actions through document review. As such we can confirm Yurringa 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]

SUE CHENNELL
Exemplar Global Lead Auditor #114812
Director

Compliance Management Framework

Classification: [redacted]

Version: 3.0 | Effective date: February 2026 | Review: 12 months

This Framework describes how Yurringa Energy establishes, operates and continually improves its compliance management system (CMS) to meet obligations under the National Energy Retail Law (NERL), National Energy Retail Rules (NERR), National Energy Retail Regulations, and relevant jurisdictional energy legislation, and to demonstrate organisational and technical capacity required for Australian Energy Regulator (AER) retailer authorisation.

Contents

1. Purpose and outcomes

The purpose of this Framework is to:

- set clear governance, accountability and expectations for compliance across Yurringa Energy;
- ensure we can identify, understand, implement and evidence compliance with applicable energy laws and other obligations;
- support AER retailer authorisation by demonstrating organisational and technical capacity, financial viability controls, and suitability through documented systems and assurance;
- provide consistent processes for monitoring, reporting, rectifying and preventing non-compliance; and
- protect customers—particularly vulnerable customers (including life-support, hardship and family violence affected customers).

Outcomes: Outcomes we target:

- No preventable customer harm from compliance failures;
- Timely and accurate reporting to the AER, including immediate and material breach reporting as required;
- A demonstrably effective CMS aligned to AS/ISO 37301:2023 with evidence of ongoing assurance and improvement;
- Audit-ready processes, records and people.

2. Regulatory context and authorisation alignment

Yurringa Energy's retail operations are governed by the National Energy Customer Framework (NECF) suite of instruments, including the NERL, NERR and National Energy Retail Regulations, as adopted in participating jurisdictions. In addition, the AER sets and enforces retailer compliance requirements through the AER Compliance procedures and guidelines and related reporting templates.

2.1 AER retailer authorisation – what we must demonstrate

Under the AER authorisation process, applicants must satisfy three entry criteria. This Framework is designed to provide the documented arrangements and evidence to support those criteria:

- Organisational and technical capacity to meet retailer obligations (including systems, processes, people and controls).
- Financial resources / access to resources to ensure financial viability and capacity to meet obligations.
- Suitability of the applicant (fitness and propriety, governance, and compliance history).

2.2 Relationship to other required policies and programs

This Framework is the top-level compliance document and is supported by policies, procedures, registers and plans, including (non-exhaustive):

- Compliance Policy (this document – principles, governance and CMS requirements).
- Compliance Obligations Register (mapped to NERL/NERR/Regulations and jurisdictional requirements).
- Incident & Breach Management Procedure (assessment, escalation, reporting, remediation and RCA).
- Customer hardship policy (AER-approved) and procedures.
- Life support and disconnection protections procedures.
- Family violence policy and procedures (including data handling and reporting restrictions).
- Privacy and information security policy.
- Outsourcing / vendor management policy.
- Internal audit and assurance plan.

3. Scope and applicability

This Framework applies to:

- the Board, executives, employees, contractors, labour hire, and agents;
- all business units and operations (including billing, marketing, sales, customer service, collections, credit and hardship, metering and market interactions);
- all outsourced and third-party arrangements where Yurringa Energy remains accountable for compliance outcomes; and
- all jurisdictions in which Yurringa Energy sells energy, noting that jurisdictional variations are captured in the Compliance Obligations Register.

4. Compliance governance and accountability

4.1 Three lines model (adapted)

Yurringa Energy uses a clear accountability model:

- 1st line: Business owners and operational teams manage compliance day-to-day and operate controls.
- 2nd line: Compliance Function sets the framework, provides advice, monitors, supports reporting and challenges control effectiveness.
- 3rd line: Independent assurance (internal audit / external audit) tests the CMS and key controls.

4.2 Roles and responsibilities

Board – Board

- Approve this Framework and key compliance policies.
- Set compliance risk appetite and oversee compliance performance and material incidents.
- Receive regular compliance reporting and direct management actions where needed.

CEO/MD – CEO / Managing Director
- Ultimately accountable for compliance performance and resourcing.
- Ensures compliance is integrated into strategy, operations and culture.
- Approves and signs AER reports where required (including immediate/material breach reports in accordance with AER requirements).

Head of Compliance – Head of Compliance
- Owns the CMS design and operation, including registers, reporting and assurance program.
- Leads breach assessment, regulatory reporting coordination and remediation oversight.
- Reports independently to the CEO and has direct access to the Board/Audit & Risk Committee.

Managers/Process Owners – Managers / process owners
- Own and operate controls, procedures and work instructions.
- Identify and escalate compliance risks, incidents and emerging issues.
- Complete corrective and preventative actions within agreed timeframes.

All Staff – All staff and representatives
- Understand and follow applicable obligations and procedures.
- Complete mandatory training and maintain competence.
- Report suspected or actual non-compliance immediately through approved channels.

5. Compliance management system (AS/ISO 37301:2023 aligned)

Yurringa Energy maintains a Compliance Management System aligned to AS/ISO 37301:2023 and the AER Compliance procedures and guidelines. The CMS comprises the components below.

5.1 Core CMS artefacts

- Compliance Obligations Register (single source of truth).
- Compliance Risk Register (linked to enterprise risk management).
- Control Library and Control Testing Schedule (key controls mapped to obligations).
- Compliance Monitoring & Assurance Plan (annual plan).

- Breach Register (AER data fields captured for reportable obligations).
- Training Matrix and training records.
- Document control and versioning for policies/procedures.
- Board and executive reporting pack and cadence.

5.2 Independence and resourcing

The Compliance Function is resourced to meet operational needs and has authority to:

- access records and systems needed to perform monitoring and investigations;
- require timely remedial actions and escalate overdue actions;
- stop or pause practices that create unacceptable compliance risk; and
- engage external advisors where specialist support is required (e.g., audits, legal interpretations).

6. Compliance obligations lifecycle

Obligations are managed through a structured lifecycle to ensure requirements are identified, implemented, tested and evidenced:

1. Identify: Maintain comprehensive obligations register for all applicable laws, rules, regulations, authorisation conditions and commitments.
2. Interpret: Translate obligations into plain-language requirements, including jurisdictional variations and operational impacts.
3. Implement: Design and embed procedures and controls into business processes and systems.
4. Educate: Train staff and third parties on role-specific obligations and how to comply.
5. Monitor & test: Conduct monitoring, key control testing and assurance activities.
6. Report: Escalate internally and report externally (AER) where required.
7. Remediate: Fix issues promptly, compensate customers where applicable and prevent recurrence.
8. Improve: Use trend analysis, audit findings and regulatory feedback to strengthen controls.

6.1 Regulatory change management

Regulatory change is managed via a controlled process that includes horizon scanning, impact assessment, implementation planning and verification. Key steps include:

- Regulatory watch (AER/AEMC publications, rule changes, guidance updates).
- Change impact assessment (systems, people, procedures, customer communications).
- Implementation plan with owners, milestones and testing.
- Update obligations register, controls, training and customer materials.
- Post-implementation review to confirm compliance and operational effectiveness.

7. Risk management and control design

Compliance risk is managed as part of the enterprise risk management framework. Risks are assessed by likelihood, impact (including customer harm), velocity, and detectability, and are linked to controls and assurance.

7.1 Control principles

- Preventive controls are preferred for high-impact obligations (e.g., disconnection protections).
- Detective controls provide timely identification of failures (exception reports, sampling, analytics).
- Controls must be documented, owned, and tested on a risk-based schedule.
- Where third parties deliver processes, controls must include oversight, performance SLAs and audit rights.

7.2 Customer-critical obligations (minimum focus areas)

The CMS prioritises controls for obligations that can cause significant customer harm, including (but not limited to):

- life support registration and protections;
- hardship and payment difficulty obligations;
- family violence protections;
- explicit informed consent and marketing conduct;
- billing accuracy and timeliness;
- disconnection and de-energisation protections;
- complaints handling and ombudsman engagement.

8. Monitoring, assurance and audit

Monitoring and assurance are risk-based and cover people, process and technology controls. The annual plan sets scope, frequency, sampling methodology, evidence standards, and reporting requirements.

8.1 Monitoring activities (examples)

- call and digital interaction quality assurance (including consent and disclosure checks);
- billing and payment exception reporting and reconciliation;
- disconnection workflow testing (including life support and hardship flags);
- complaints analytics and root cause analysis;
- vendor performance reviews and compliance attestations;
- self-assessments against AER reportable obligations.

8.2 Compliance audits

Yurringa Energy will be audit-ready and will:

- cooperate with AER-initiated audits and information requests;
- conduct internal audits and independent assurance of the CMS and key controls;
- maintain evidence packages for critical obligations and incidents;
- ensure audit issues are tracked to closure with owner accountability.

9. Incident, breach and remediation management

Yurringa Energy maintains a formal issue management process that ensures prompt detection, assessment, escalation, reporting and remediation of compliance incidents. No employee may unilaterally decide a potential breach is not reportable.

9.1 Workflow (minimum)

1. Detect & log: Capture in the Incident & Breach Register with unique ID and required data fields.
2. Triage: Confirm obligation, jurisdiction, affected customers, severity and containment steps.
3. Assess reportability: Determine whether the incident is (a) immediate, (b) half-yearly reportable, (c) a material breach, or (d) non-reportable (with rationale).
4. Escalate: Immediate/material incidents escalated to CEO/MD and Board as required by the escalation matrix.
5. Notify and report externally: Submit AER reports within required timeframes using current AER templates.
6. Remediate: Fix root causes, compensate customers where required, and implement preventive controls.
7. Validate & close: Verify effectiveness, document evidence and sign-off closure.
8. Learn: Trend analysis and systemic improvement actions.

9.2 Root cause analysis and customer remediation

For material, systemic or high-impact incidents, a documented root cause analysis (RCA) is mandatory and must include:

- primary cause(s) and contributing factors (process, system, people, third party);
- customer impact assessment and remediation plan;
- control improvements and change management steps;
- monitoring to confirm no recurrence.

10. Regulatory reporting and engagement (AER)

10.1 AER reporting cadence (Compliance procedures and guidelines v7)

Yurringa Energy will comply with AER reporting requirements, including immediate reporting (within 2 business days of identifying a breach of an immediate obligation), half-yearly reporting (by 28 February and 31 August), and material breach reporting as soon as reasonably practicable. CEO/MD sign-off requirements are applied in accordance with AER guidance.

10.2 Quality and confidentiality controls for regulatory submissions

- All submissions undergo legal/compliance quality review, data validation and management sign-off.
- Family violence: no identifying information about affected customers is included in AER submissions.
- Records of all submissions and correspondence are stored in the Regulatory Engagement repository.

10.3 Proactive engagement

We engage proactively with the AER, including early discussion of systemic issues, audit readiness, and timely responses to information requests.

11. Third-party and outsourcing governance

Where functions are outsourced (e.g., billing systems, call centres, marketing agencies), Yurringa Energy remains accountable for compliance. Third-party governance includes:

- due diligence and risk assessment before onboarding;
- contract clauses for compliance, training, audit rights, data handling and incident notification;
- service level and quality measures aligned to compliance obligations;
- regular monitoring and performance reviews;
- annual compliance attestations and targeted audits for high-risk services.

11.1 Key outsourced service providers

Yurringa Energy's operational model relies on two critical third-party technology providers that together underpin the compliance management system (CMS): the Third-Party Billing and CMS Provider and Third-Party CRM Provider. Both providers are engaged under executed Master Services Agreements and operate under ongoing compliance and governance oversight obligations as described in this section.

11.2 the Third-Party Billing and CMS Provider – Billing and CMS platform

The Third-Party Billing and CMS Provider is engaged to provide Yurringa Energy's billing system and customer management system (CMS) platform under a Master Services Agreement (MSA). the Third-Party Billing and CMS Platform is the primary operational system through which Yurringa Energy fulfils a wide range of NERL/NERR obligations, including billing accuracy and timeliness, metering data processing (NEM12/NEM13), market system interactions (MSATS, B2B), life support registration, hardship flags, disconnection workflows, and AER-reportable compliance controls.

Scope of services

- Customer billing engine: invoice generation, tariff configuration, billing cycle management, and meter data ingestion across NEM jurisdictions (VIC, NSW, QLD, SA, ACT) and WA (ERM).
- Market system interactions: AEMO MSATS enrolment and transfer transactions, NEM12/NEM13 meter data file processing, and B2B e-Hub participant interactions.
- Customer account management: contract and account lifecycle management, life support customer registration and flagging, hardship program enrolment and tracking, payment difficulty indicators, and disconnection workflow controls (including mandatory life support and hardship checks before any de-energisation).
- Compliance data and reporting: generation of billing exception reports, AER half-yearly reporting data extracts, and audit trails for key compliance obligations.

Compliance and governance obligations under the Billing and CMS Provider MSA
The Billing and CMS Provider MSA includes specific provisions to support Yurringa Energy's compliance obligations and AER authorisation requirements. Key contractual compliance mechanisms include:

- **Service levels and SLAs:** defined uptime, data processing, and issue resolution timeframes that align with Yurringa Energy's regulatory obligations, including timely billing, metering data processing, and market transaction deadlines.
- **Audit rights:** Yurringa Energy retains the right to audit the Third-Party Billing and CMS Provider's systems, records and processes relevant to compliance obligations, with reasonable notice. This includes audit of billing calculation logic, disconnection workflow controls, and data integrity for AER-reportable functions.
- **Incident notification:** Third-Party Billing and CMS Provider is obligated to notify Yurringa Energy promptly of any system incidents, data errors or processing failures that may have a material impact on compliance obligations or customer outcomes, to enable Yurringa Energy to assess reportability under the AER Compliance procedures and guidelines.
- **Data handling and privacy:** Third-Party Billing and CMS Provider handles customer personal information as a contracted service provider and is subject to data security standards, Privacy Act 1988 obligations, and specific requirements relating to the protection of family violence-affected customer data consistent with Yurringa Energy's Family Violence Policy.
- **Annual compliance attestation:** Third-Party Billing and CMS Provider provides an annual written attestation confirming compliance with agreed service standards, data handling obligations and the controls relied upon by Yurringa Energy to discharge its own NERL/NERR obligations.

Ongoing oversight
Yurringa Energy's Compliance Function undertakes quarterly performance reviews of the Third-Party Billing and CMS Platform against agreed SLAs and compliance KPIs, with findings reported to the Head of Compliance and escalated where material issues are identified. Given the centrality of the Third-Party Billing and CMS Platform to Yurringa Energy's ability to meet its obligations as a licensed retailer, it is classified as a Tier 1 critical vendor for compliance oversight purposes.

11.3 Third-Party CRM Provider – CRM and digital platform

The Third-Party CRM Provider is engaged to provide Yurringa Energy's Customer Relationship Management (CRM) system and digital platform under a Master Services Agreement. The Third-Party CRM and Digital Platform is the primary customer-facing and customer-engagement layer, managing customer acquisition, onboarding, digital communications, complaints intake, and the digital self-service experience. It interfaces with the Third-Party Billing and CMS Platform to ensure a coherent end-to-end customer record and to support compliance obligations relating to customer communications, consent, and disclosure.

Scope of services

- CRM and customer lifecycle management: customer onboarding workflows (including explicit informed consent capture and identity verification), contract execution, move-in/move-out management, and customer account maintenance for C&I customers.
- Digital communications: automated and triggered customer communications (welcome letters, bills, reminders, disclosure documents) in accordance with NERL/NERR requirements for timing, content and format.
- Complaints and enquiry management: digital and web-based intake of customer complaints, logging, routing and status tracking to support compliance with complaints handling timeframes under the NERR and applicable Energy and Water Ombudsman scheme rules.
- Digital self-service: customer portal and app functionality enabling customers to view bills, update account details, and access hardship or payment assistance pathways in compliance with accessibility and disclosure requirements.

Compliance and governance obligations under the CRM Provider MSA

The CRM Provider MSA includes governance provisions that reflect the compliance significance of the CRM and digital platform to Yurringa Energy's customer-facing obligations. Key compliance mechanisms include:

- **Consent and disclosure controls:** Third-Party CRM Provider is required to configure and maintain the CRM platform to support Yurringa Energy's explicit informed consent obligations under the NERR, including timestamped consent records, marketing consent management, and compliant contract execution workflows.
- **Change management for regulatory updates:** Third-Party CRM Provider is contractually required to implement platform changes necessary to give effect to regulatory changes (e.g., updated NERR requirements for customer communications content, format or timing) within agreed lead times and with prior testing and sign-off by Yurringa Energy's Compliance Function.
- **Data security and privacy:** Third-Party CRM Provider holds and processes customer personal information and is subject to Yurringa Energy's Privacy Policy obligations and the Privacy Act 1988 (Cth), including Australian Privacy Principles compliance, mandatory data breach notification obligations under the Notifiable Data Breaches scheme, and specific protections for family violence-affected customer data.
- **Audit rights and records access:** Yurringa Energy retains audit rights over the Third-Party CRM Provider's systems and records relating to compliance-relevant functions (consent records, complaints logs, communication delivery records), exercisable on reasonable notice or immediately in the event of a suspected material compliance incident.

- **Incident notification:** Third-Party CRM Provider must promptly notify Yurringa Energy of platform incidents (including outages, data integrity issues, failed communications, and security breaches) that may affect Yurringa Energy's compliance with customer communication or consent obligations.

Ongoing oversight
Third-Party CRM Provider is classified as a Tier 1 critical vendor. The Compliance Function conducts quarterly performance and compliance reviews of the Third-Party CRM and Digital Platform, with a focus on complaints handling timeliness, consent record integrity, and communications compliance. Material deficiencies are escalated to the Head of Compliance and, where they affect AER-reportable obligations, to the CEO and potentially the AER as required.

11.4 Platform integration and CMS interdependencies

The Third-Party Billing and CMS Platform and Third-Party CRM and Digital Platform are operationally integrated and together constitute the core technology infrastructure of Yurringa Energy's compliance management system. Key integration points with direct compliance significance include:

- Customer master data synchronisation between the Third-Party CRM Provider (CRM) and the Third-Party Billing and CMS Provider (billing) to ensure consistent and accurate customer records underpinning billing, life support registration, and hardship flags.
- Billing data flows from Third-Party Billing and CMS Provider to Third-Party CRM Provider for presentation to customers via the digital portal and communications, ensuring billing disclosures and statements of account meet NERR requirements.
- Complaints received through Third-Party CRM Provider are logged and tracked in a manner that supports Yurringa Energy's complaint handling obligations and enables data extraction for AER half-yearly compliance reporting.

Where integration failures between the two platforms occur, Yurringa Energy's incident management procedure is triggered. Both the Third-Party Billing and CMS Provider and Third-Party CRM Provider are contractually required to cooperate in joint incident investigation and remediation where cross-platform issues arise. Integration performance is reviewed as part of the quarterly vendor oversight process.

12. Training, competency and culture

Training is mandatory and role-based. Minimum program elements:

- induction training for all staff and representatives before customer interaction;
- annual refresher training and assessment;
- role-specific modules (life support, hardship, family violence, consent, billing, disconnections, complaints);
- regulatory change training triggered by rule/guideline updates;
- training effectiveness monitoring (testing, QA results, coaching plans).

12.1 Speak-up and escalation

Yurringa Energy supports a speak-up culture. Staff can report issues via manager escalation, the Compliance mailbox, or an anonymous channel. Retaliation is prohibited.

13. Records, evidence and document control

We maintain accurate, complete and accessible records to demonstrate compliance and support audits and reporting. Record categories include:

- obligations register and change logs;
- control evidence and testing results;
- breach register and remediation evidence;
- AER submissions and correspondence;
- training completion and assessment results;
- customer impact and remediation records;
- vendor oversight records.

Retention: records are retained for at least seven (7) years or longer where required by law or contract.

14. Continuous improvement and management review

The CMS is reviewed at least annually and after any significant incident or regulatory change. Management review includes:

- compliance performance metrics and trends;
- audit and assurance outcomes;
- breach root causes and recurrence rates;
- customer outcomes and complaints insights;
- resource adequacy and capability reviews;
- effectiveness of third-party oversight.

15. Framework approval and review

Approved by: Yurringa Energy Board
Approval date: _____
Signed: _____ Name/Role: _____
Next review date: _____

Appendix A: AER retailer authorisation evidence map

This appendix lists typical evidence packages that support the three AER entry criteria. It should be tailored to the business model and any outsourcing arrangements.

Entry criterion	What we demonstrate	Evidence / artefacts (examples)
Organisational & technical capacity	Documented operating model, systems, processes, trained people, and controls capable of meeting retailer obligations before commencing retailing.	Compliance Management Framework; obligations register; key policies (hardship, life support, family violence, complaints); operating procedures; customer communications; system configuration and control evidence; monitoring & assurance plan; third-party contracts and oversight model; incident/breach procedure; sample reports and dashboards.
Financial resources / viability	Access to resources and controls to meet prudential and operational obligations and to withstand shocks.	Budget and funding plan; audited/management accounts; liquidity and capital policy; risk limits for wholesale exposure; insurance coverage; cost-to-serve model; contingency funding; business continuity and failure management.
Suitability	Integrity, governance, transparency and compliance culture; disclosure of relevant history.	Fit and proper declarations; governance charter; board/committee terms of reference; conflicts management; compliance history disclosures; enforcement history and remediation evidence (if any); training and conduct code.

Appendix B: Compliance reporting categories and timelines (AER v7)

Minimum internal standards aligned to AER Compliance procedures and guidelines v7 (effective 1 April 2025):

- Immediate obligations: initial report to AER no later than 2 business days after identification; if initial report is not CEO/MD signed, submit signed final report within 20 business days.
- Half-yearly obligations: report breaches for 1 July–31 December by 28 February; report breaches for 1 January–30 June by 31 August.
- Material breaches: report as soon as reasonably practicable after identification; CEO/MD sign-off expectations as per AER guidance.
- Submission extensions: request in writing to AERCompliance@aer.gov.au before the relevant deadline.

Note: current AER reporting templates must be used. Family violence—do not include any identifying information about affected customers in submissions.

Appendix C: Escalation matrix and materiality guidance

Escalation triggers (non-exhaustive):

- Potential or actual breach of an immediate obligation (escalate to Head of Compliance immediately; CEO/MD within 24 hours).
- Any customer safety risk, wrongful de-energisation, or life support impact (CEO/MD and Board Chair within 24 hours).
- Family violence data exposure or procedural failure (CEO/MD and Privacy/Security lead immediately).
- Systemic or repeated breach trend, or significant complaint spike (Executive Risk Committee review).
- Any breach likely to be material: consumer harm, widespread impact, significant financial loss, or serious process/system failure (CEO/MD and Board/Audit & Risk Committee).

Appendix D: Annual compliance plan template (minimum)

1. Top compliance risks for the year and rationale (linked to risk register).
2. Key obligations focus areas (e.g., life support, hardship, family violence, billing, disconnections, consent).
3. Monitoring and control testing schedule (who, what, frequency, sampling).
4. Planned internal audits / external audits.
5. Training plan and refreshers.
6. Third-party oversight plan (attestations, reviews, audits).
7. Reporting calendar (AER half-yearly due dates, board reporting dates).
8. Resources and tools required.
9. Success measures (KPIs/KRIs) and target thresholds.

Appendix E: Board compliance reporting pack (outline)

- Executive summary: key issues, emerging risks, and required decisions.
- AER reporting: status, submissions made, upcoming deadlines.
- Incidents and breaches: new, open, overdue actions, materiality assessment.
- Customer outcomes: hardship metrics, complaints, ombudsman cases, life support impacts.
- Assurance: monitoring results, control test outcomes, audit findings and closure rates.
- Regulatory change: updates, implementation status, residual risks.
- Third-party oversight: SLA performance, audit results, incidents, and remediation.

Culture and capability: training completion, QA coaching

Customer Complaints and Dispute Resolution

Customer Complaints and Dispute Resolution

This document outlines Yurringa Energy's complaints handling policy and complaints management procedure.
Please don't hesitate to call us if you have any questions.

Purpose

The purpose of the Complaints and Dispute Resolution Policy and Procedure is to:

- Protect and encourage customers with the right to complain about their dealings with Yurringa Energy
- Ensure an accessible and reasonable complaints process is in place; and
- Provide mechanisms for resolution in a timely, efficient, and courteous manner

Our commitment to our customers

At Yurringa Energy we are committed to ensuring our customers are happy with our products and services. However, there may be instances where a customer may want to provide us with feedback or lodge a complaint.

We recognise and value the right of every customer to be treated respectfully, fairly, and have their concerns heard and responded to in a timely manner.

We protect the personal information of our customers in accordance with the Australian Privacy Laws.

You can view Yurringa Energy's privacy policy at Yurringaenergy.com.au.

Our dispute resolution process ensures maintaining this confidentiality and we will not disclose any personal information of the customer to third parties without permission except as and when permitted and required by the Privacy Act.

At Yurringa Energy we also recognise that customer feedback is valuable in improving our systems, procedures, products, and services.

How to make a complaint
Yurringa Energy customers reserve the right to make a complaint to Yurringa Energy directly by phone, post or online chat via the feedback form available on our website.

Alternatively, a complaint can also be made through an external dispute resolution scheme should you not be happy with the resolution offered. If you prefer to call us, our contact details are: 1300 477 168 For business customers. Monday to Friday 8.00am to 5.00pm AEST/AEDT.

If you prefer to use our online form, use this link:
https://yurringaenergy.com.au/contact/

If you prefer to write to us, our postal address is:
Yurringa Energy
Level 1
116 Rokeby Street
Collingwood Victoria 3066

If you require the assistance of our interpreter services, please call 1300 477 168 (Monday to Friday, 9.00am to 5.00pm AEDT/AEST).

What happens after a complaint is made?

Our trained staff will handle each complaint impartially, empathetically, professionally, and in line with jurisdictional regulatory requirements where applicable. We will acknowledge your complaint within 5 business days via communication channel. If not, we shall contact you by the same channel that you initially made the complaint.

Each complaint is recorded to help us perform periodical reviews and will assist us in improving our processes, products & services. Customers will be kept informed on the progress of their complaint as we progress through investigation of the complaint.

Complaints will only be officially closed once the customer has expressed satisfaction in the outcomes provided or when all reasonable steps have been taken to try to resolve the issue to both the customer's and Yurringa Energy's satisfaction. We will provide evidence of agreed actions that have been taken to resolve the initial issue.

Yurringa Energy has the right to cease interacting with a customer regarding their complaint should the customer engage with Yurringa Energy in an unreasonable or disrespectful manner.

What happens if the customer is dissatisfied with the internal dispute resolution process?

The customer has the right to escalate their concern to an external dispute resolution body at any time if the complaint is not resolved to their satisfaction. The customer can lodge a complaint with the Energy and Water Ombudsman scheme in their state.

Third-Party Contract & Vendor Risk Management Framework
Yurringa Energy

Attachment 41

Classification: [redacted]
Version: 2.0 | Effective date: June 2026 | Review: 12 months

This Framework sets the requirements and operating model for selecting, contracting, onboarding, managing, assuring and exiting third-party suppliers. It establishes clear responsibilities, accountabilities, tools, methods, training requirements, oversight cadence, escalation triggers, termination protocols, and breach remediation procedures.

Contents

1. Purpose

The purpose of this Framework is to ensure that third-party arrangements are governed and managed to:

- protect customers and prevent customer harm;
- maintain compliance with all applicable obligations and commitments;
- ensure service quality, resilience and continuity;
- manage security, privacy and data risks;
- provide objective oversight, evidence and audit readiness; and
- enable safe and timely remediation and exit if required.

2. Scope

This Framework applies to:

- all suppliers, contractors, outsourced service providers and agents ("third parties");
- all contract types (MSA, SOW, PO, panel, referral/marketing, SaaS, BPO, collections, IT managed services, etc.); and
- all business units and functions that select, manage, pay, oversee or rely on third-party services.

3. Principles

- Accountability remains with Yurringa Energy (outsourcing does not outsource accountability).
- Risk-based oversight: higher risk suppliers require stronger controls and more frequent oversight.
- Single source of truth: contracts, obligations, evidence and actions are stored in approved repositories.
- Evidence-driven management: performance, risk and compliance decisions are supported by data and records.
- Security & privacy by design: minimum controls apply whenever systems or data are accessed.
- Clear remedies: enforceable service credits, cure plans, step-in and termination rights.
- Continuous improvement: lessons learned and trend insights drive control uplift.

4. Governance model

4.1 Three lines model (adapted)

- 1st line – Business / Service owners: operate the service and day-to-day controls, manage performance and issues.

- 2nd line – Procurement, Risk, Compliance, Security, Privacy: provide frameworks, guardrails, monitoring, assurance and challenge.
- 3rd line – Independent assurance (internal audit/external): tests the effectiveness of the framework and key controls.

5. Roles, responsibilities and accountabilities

5.1 Board / Audit & Risk Committee

- Approve this Framework and oversee material outsourcing and critical supplier risk.
- Receive quarterly summaries for Tier 1 suppliers and material incidents.
- Direct management actions where residual risk exceeds appetite.

5.2 CEO / Executive Sponsor

- Accountable for resourcing and executive decision-making for high-risk suppliers.
- Approves material exceptions to standards and critical remediation/exit decisions.

5.3 Procurement / Commercial

- Leads sourcing, tendering, commercial evaluation and negotiation.
- Ensures use of approved templates and maintains the contract repository and renewals calendar.

5.4 Contract Manager (Commercial Owner)

- Owns contract compliance, variations, disputes, credits/remedies and renewal planning.
- Ensures reporting cadence is maintained and actions are tracked to closure.

5.5 Service Owner (Operational Owner)

- Accountable for service outcomes, operational integration and control operation.
- Owns day-to-day performance management and operational risk controls.

5.6 Risk & Compliance

- Owns the vendor risk methodology, tiering rubric, assurance plan and escalation standards.
- Performs oversight, challenges control effectiveness and monitors remediation.

5.7 Security & Privacy

- Owns security due diligence, privacy impact assessments (as required), and minimum security requirements.
- Monitors security posture and ensures incident response integration.

5.8 Legal

- Advises on legal risk, reviews non-standard terms, supports dispute/claims management.
- Approves material contract departures and termination documentation.

5.9 Finance

- Manages payment controls, invoice validation and financial exposure monitoring for critical suppliers.

5.10 Vendor

- Delivers contracted services and meets KPI/SLA targets.
- Complies with contract requirements, including reporting, incident notification and remediation.

6. RACI matrix (visual)

The RACI matrix below summarises responsibilities and accountabilities for key third-party management activities.

RACI Matrix - Third-Party Contract Management

	Board/ARC	CEO/Exec	Contract Manager	Service Owner	Procurement	Risk & Compliance	Security & Privacy	Legal	Finance	Vendor
1. Outsourcing strategy & policy	A	R	C	C	C	C	C	C	C	I
2. Vendor risk tiering	I	A	C	R	R	A	C	I	I	I
3. Due diligence	I	A	C	R	R	C	A	C	C	R
4. Contract drafting & negotiation	I	A	R	C	R	C	C	A	C	C
5. Security & privacy controls approval	I	A	C	C	C	C	A	C	I	R
6. Go-live onboarding	I	C	A	R	C	C	R	I	C	R
7. KPI/SLA performance monitoring	I	C	A	R	C	C	I	I	C	R
8. Incident mgmt, escalation & RCA	I	C	A	R	C	A	C	I	C	R
9. Compliance checks & attestations	I	C	C	R	C	A	C	I	I	R
10. Audit / assurance	I	C	C	C	I	A	C	C	C	R
11. Variations / change control	I	A	R	C	C	C	C	A	C	C
12. Renewal & benchmarking	I	A	R	R	C	C	I	C	C	I
13. Exit & transition	I	A	R	R	C	C	C	C	C	R

R = Responsible A = Accountable C = Consulted I = Informed

7. Third-party lifecycle (end-to-end)

21. Initiate & classify: define the service, assess data access and customer impact, assign vendor tier.
22. Select: conduct due diligence and evaluate vendors against commercial, operational, compliance, security and privacy criteria.
23. Contract: execute agreements using approved templates and mandatory clauses/schedules for the assigned tier.

24. Onboard: complete readiness checks, training, access provisioning and operational handover.
25. Operate & monitor: track KPIs/SLAs, incidents, changes and risks; hold governance meetings; evidence controls.
26. Assure: perform attestations, control testing and audits based on tier and risk profile.
27. Renew or exit: complete renewal gate reviews or execute termination/transition plan and close-out.

8. Third-party risk assessment framework

All suppliers must undergo a risk assessment prior to engagement and at least annually thereafter (more frequently for Tier 1–2).

8.1 Risk tiering

Each supplier is classified using a structured rubric:

Tier	Description	Oversight Requirements
Tier 1 – Critical	Failure causes major customer harm, regulatory breach, operational shutdown, or significant financial loss	Monthly performance reviews, quarterly executive reviews, annual audit, annual BCP/DR test
Tier 2 – High	Significant impact on customers, data, operations, or compliance	Quarterly service reviews, annual audit or attestation
Tier 3 – Medium	Moderate business/process impact	Quarterly monitoring; annual training; attestation as needed
Tier 4 – Low	Minimal impact, commodity goods	Annual review only

8.2 Risk domains

- Operational: dependency, capacity, resourcing, delivery model and subcontractors.
- Compliance & regulatory: ability to meet applicable obligations, record keeping and reporting.
- Security & privacy: data classification, access, encryption, monitoring, incident response, retention/deletion.
- Financial: solvency, insurance, concentration risk and exit costs.
- Customer: likelihood of customer detriment, complaints sensitivity and contact quality.

8.3 Reassessment triggers

- Material scope change, new integrations, increased data sensitivity or system access.
- Repeated SLA failures or major incident/breach.
- Vendor acquisition, restructuring, subcontractor changes.
- Material regulatory or policy change affecting obligations.

9. Due diligence requirements

Due diligence must be completed and documented before contract execution for Tier 1–3 suppliers.

9.1 Minimum due diligence components (risk-based)

- Commercial: pricing model, indexation, implementation and exit costs, financial viability, insurance.
- Operational: delivery model, resourcing, subcontractors, change management, incident management, capacity planning.
- Compliance: relevant policy and procedure maturity, complaints handling, evidence of past compliance.
- Security: security questionnaire, vulnerability management, access controls, logging/monitoring, cyber insurance.
- Privacy: data flows, privacy impact assessment where required, retention/deletion and cross-border processing controls.
- Resilience: business continuity and disaster recovery plans including RTO/RPO; evidence of DR testing for Tier 1.

9.2 Decision gates

- Tier 1–2: Risk/Compliance and Security/Privacy sign-off is mandatory prior to execution.
- Any exceptions to minimum controls require CEO/Executive Sponsor approval and documented acceptance of residual risk.

10. Contracting standards (minimum clauses)

Contracts must include, at a minimum (scaled by tier):

- Scope, deliverables, acceptance criteria and service catalogue.
- KPIs/SLAs with measurement method and reporting frequency.
- Audit rights (including subcontractors) and evidence obligations.
- Security and privacy schedules (data handling, breach notification, access controls).
- Subcontracting controls and flow-down requirements.
- Incident management and RCA/CAPA timeframes.

- Business continuity and DR requirements and test frequency.
- Change control and variation governance.
- Remedies: service credits, cure plans, step-in rights.
- Exit management: transition assistance, data return/destruction, knowledge transfer.

11. Onboarding & operational readiness

A documented go-live checklist must be completed before services commence, including:

- named service owner and contract manager; escalation contacts confirmed;
- runbooks/SOPs and scripts approved;
- access provisioned using least privilege and logged;
- training completed for vendor staff and internal staff managing the service;
- baseline KPIs agreed; reporting pack established;
- incident and change workflows tested;
- BCP/DR evidence received (Tier 1–2).

12. Oversight, monitoring and reporting cadence

12.1 Oversight methods

- KPI/SLA monitoring and trend analysis.
- Quality assurance sampling (calls, tickets, transactions) where relevant.
- Compliance attestations and evidence requests.
- Control testing and targeted audits based on tier and risk profile.
- Customer complaint monitoring and correlation to vendor activity.
- Security monitoring: vulnerability and patching status, access review, incident alerts.
- Financial health monitoring for Tier 1 suppliers.

12.2 Minimum governance cadence

Cadence must be scaled to vendor tier (minimum):

- Tier 1: weekly operational check-ins; monthly service reviews; quarterly executive reviews; annual audit/assurance; annual DR test.
- Tier 2: fortnightly/monthly operational reviews; quarterly service reviews; quarterly executive reviews; assurance at least every 12–18 months.
- Tier 3: monthly operational review; quarterly service review; annual attestation as needed.
- Tier 4: annual review; exception-based oversight.

12.3 Oversight reporting

- Operational leadership: monthly consolidated vendor performance pack (Tier 1–3).
- Executive/Risk committee: quarterly pack (Tier 1–2 deep dives, hotspots, overdue actions).
- Board/ARC: quarterly summary (Tier 1 critical + material issues), plus ad-hoc escalations.

13. Escalation framework

Escalation ensures timely containment, decision-making and prevention of customer harm.

13.1 Severity levels

- Severity 1 (Critical): customer harm, major outage, data exposure, or serious compliance breach.
- Severity 2 (High): significant service interruption or repeated failures.
- Severity 3 (Medium): non-critical issue with emerging trend.
- Severity 4 (Low): minor isolated issue.

Escalation Timeframes

Severity	Notify Internal Mgmt	Notify Executive	Notify Regulator (if applicable)	Vendor RCA
1	Immediate	< 2 hrs	As required by law	Within 5 days
2	< 12 hrs	< 24 hrs	If materially significant	Within 10 days
3	< 48 hrs	As needed	No	Within 20 days
4	Weekly reporting	No	No	

13.2 Escalation triggers (examples)

- Two consecutive SLA failures or sustained under-performance.
- Security incident, suspected data exposure, or critical vulnerability not remediated within SLA.
- Unauthorised subcontracting or refusal to provide evidence/audit access.
- Customer complaints spike linked to vendor activity.
- Regulatory impact or high reputational risk.

14. Breach remediation procedures

14.1 Workflow (minimum)

28. Log incident in the Vendor Incident Register with unique ID.
29. Classify severity and perform initial containment.
30. Notify internal stakeholders and the vendor per escalation requirements.
31. Require vendor incident report and root cause analysis (RCA) within agreed timeframe.
32. Define corrective and preventive actions (CAPA) with owners and due dates.
33. Validate effectiveness (control testing/QA sampling/security verification).
34. Close incident with documented evidence and lessons learned.
35. Update risk assessment and oversight cadence if residual risk changes.

14.2 Evidence requirements

- Incident report, impact assessment and timeline.
- RCA document and contributing factors.
- Customer impact and remediation evidence (if applicable).
- CAPA plan and completion evidence.
- Updated controls and monitoring steps to prevent recurrence.

15. Termination and exit protocols

15.1 Grounds for termination (non-exhaustive)

- Repeated material breaches or failure to remedy within cure period.
- Regulatory non-compliance attributable to supplier actions or omissions.
- Data protection failure or serious security incident.
- Insolvency or inability to continue delivering services.
- Failure to provide audit evidence or comply with contractual oversight.
- Unauthorised subcontracting or confidentiality breach.

15.2 Termination process (minimum)

36. Issue notice of breach (where required) and commence cure plan.
37. Escalate to CEO/Executive Sponsor for Tier 1–2 termination decisions.
38. Invoke step-in rights if needed to maintain service continuity.
39. Activate transition and exit plan (mandatory for Tier 1–2).
40. Revoke or rotate access credentials and terminate integrations.
41. Return or securely destroy data and obtain certificates.
42. Complete knowledge transfer and service handover to replacement provider.
43. Close out with a final performance and lessons learned report.

16. Training and competency (staff and third parties)

16.1 Internal staff training

- Framework induction for all staff who select, manage or oversee vendors.
- Contract fundamentals (scope, SLAs, variations, disputes, evidence requirements).
- Vendor risk tiering and oversight cadence.
- Security, privacy and data handling.
- Incident escalation and remediation workflow.
- Conflict of interest and ethical conduct.

Frequency: onboarding prior to assuming responsibilities; annual refresher; and targeted retraining after major changes/incidents.

16.2 Third-party/vendor training

- Contractual obligations and service standards.
- Customer interaction standards (where applicable) and complaint handling expectations.
- Security awareness, privacy and data handling.
- Incident notification and RCA/CAPA requirements.
- Records and evidence expectations for audits.

Frequency: onboarding before service commencement; annual refresher for Tier 1–2; and after changes/incidents. Evidence of completion must be provided for Tier 1–2.

17. Tools and artefacts (templates and systems)

- Contract repository / CLM tool with renewals calendar and clause library.
- Vendor register (single source of truth) including tiering, contacts, dependencies and subcontractors.
- Risk and compliance register (GRC tool) for assessments, attestations, issues and actions.
- Performance dashboards for KPI/SLA reporting and trend analysis.
- Ticketing/incident management system integrated with vendor notification requirements.
- Security tooling for access management, monitoring, vulnerability management and evidence collection.
- Standard templates: DDQ, risk assessment, SLA schedule, security/privacy schedule, exit plan, monthly review pack, action log.

18. Review and continuous improvement

This Framework is reviewed at least annually and after any material incident, audit finding, regulatory change or significant outsourcing change. Continuous improvement actions are tracked to closure and reported through governance forums.

19. Third-party reporting to Yurringa Energy

This section sets out how each engaged third-party provider reports performance, compliance, incident and risk information to Yurringa Energy, including the specific tools, activities and timetables applicable to each provider. The two critical Tier 1 outsourced service providers are the Third-Party Billing and CMS Provider and the Third-Party CRM Provider. Both are subject to the Tier 1 oversight cadence in Section 12.2 and the specific requirements below.

19.1 Third-Party Billing and CMS Provider – Reporting timetable and tools

The Third-Party Billing and CMS Provider is responsible for reporting on billing system performance, market system transaction integrity, life support and hardship workflow controls, disconnection compliance, and data accuracy across all NEM jurisdictions and WA. The following timetable and tools apply.

Frequency	Reporting Activity	Tool / Mechanism	Recipient
Weekly	Operational check-in: system uptime, processing queue status, open incidents, critical alerts	Live dashboard access + structured email summary	Service Owner, Operations Manager
Weekly	Market transaction error log: failed MSATS enrolments, B2B rejections, NEM12/NEM13 exceptions	Automated exception report via secure file transfer or portal	Service Owner, Billing Operations
Monthly	Full KPI/SLA performance pack: billing accuracy rate, timely bill delivery, life support flag accuracy, disconnection workflow compliance, hardship enrolment processing times	Structured report using Appendix A template	Contract Manager, Head of Compliance
Monthly	Billing exception and reconciliation report: unbilled accounts, estimated reads, tariff configuration errors, credit balance exceptions	Data extract from billing platform + summary report	Billing Operations, Contract Manager
Monthly	Life support and hardship compliance report: registration volumes, flags applied, missed protections (if any), resolution status	Structured report with data fields for AER half-yearly extraction	Head of Compliance, Service Owner
Quarterly	Executive service review pack: rolling KPI trends, open risks, audit findings,	Formal presentation + written pack	CEO, Head of Compliance, Contract Manager

	regulatory change implementation status, incident summary		
Quarterly	Security and access review: user access rights, patch status, vulnerability remediation, cyber incident summary	Security posture report	Security/Privacy lead, Head of Compliance
Annually	Compliance attestation: written confirmation of compliance with agreed service standards, NERL/NERR obligations supported, data handling obligations, and privacy controls	Signed attestation document	Head of Compliance, Legal
Annually	BCP/DR test results: evidence of completed disaster recovery test, RTO/RPO results, identified gaps and remediation plan	Test report with evidence pack	Service Owner, Risk & Compliance
Annually	Subcontractor disclosure: updated list of subcontractors with roles, data access and contractual flow-down status	Written disclosure with supporting evidence	Legal, Risk & Compliance
Ad hoc / within 24 hours	Incident notification: any system outage, data integrity failure, processing error or security incident with material compliance impact	Immediate verbal notification followed by written incident report within 24 hours	Service Owner, Head of Compliance
Ad hoc / within 5 business days	Post-incident RCA report: root cause analysis for Severity 1-2 incidents with CAPA plan	Written RCA report using approved template	Head of Compliance, Contract Manager

19.2 Third-Party CRM Provider – Reporting timetable and tools

The Third-Party CRM Provider is responsible for reporting on customer onboarding and consent management, digital communications delivery, complaints handling performance, and CRM platform availability. The following timetable and tools apply.

Frequency	Reporting Activity	Tool / Mechanism	Recipient
Weekly	Operational check-in: platform uptime, active customer counts, onboarding queue, open complaints, system alerts	Live dashboard access + structured email summary	Service Owner, Customer Operations Manager
Weekly	Complaints status report: new complaints received, resolved, overdue, escalated to ombudsman (if any)	Automated report from CRM complaints module	Service Owner, Head of Compliance
Monthly	Full KPI/SLA performance pack: onboarding completion rate, consent capture accuracy, communications delivery rate, complaints resolution timeliness, digital self-service availability	Structured report using Appendix A template	Contract Manager, Head of Compliance
Monthly	Consent and disclosure compliance report: explicit informed consent capture rates, failed or incomplete consent workflows, marketing consent management status	Data extract from CRM + summary report	Head of Compliance, Legal
Monthly	Customer communications compliance report: NERR-required communications issued on time, failed deliveries, bounce/undeliverable rates, corrective actions	Communications delivery report from CRM/digital platform	Head of Compliance, Service Owner
Quarterly	Executive service review pack: rolling KPI trends, open risks, complaints analytics and root cause insights, regulatory change implementation status, incident summary	Formal presentation + written pack	CEO, Head of Compliance, Contract Manager
Quarterly	Security and privacy posture report: access rights review, data	Security/privacy report	Security/Privacy lead, Head of Compliance

	handling compliance, privacy incident summary, NDB scheme status		
Quarterly	Integration performance report: data synchronisation accuracy with Third-Party Billing and CMS Provider, failed data transfers, reconciliation status	Technical integration report	Service Owner, Billing Operations
Annually	Compliance attestation: written confirmation of compliance with NERR customer communications obligations, Privacy Act (Cth), consent management standards, and agreed service standards	Signed attestation document	Head of Compliance, Legal
Annually	BCP/DR test results and subcontractor disclosure	Test report + written disclosure	Service Owner, Risk & Compliance
Ad hoc / within 24 hours	Incident notification: platform outage, failed mass communications, consent data integrity failure, data breach or security incident	Immediate verbal notification + written report within 24 hours	Service Owner, Head of Compliance
Ad hoc / within 5 business days	Post-incident RCA report for Severity 1-2 incidents	Written RCA using approved template	Head of Compliance, Contract Manager

20. Receiving, considering and acting on reported information

This section establishes how Yurringa Energy receives, reviews, considers and acts on information reported by each third-party provider, including the internal decision-making process for each provider.

20.1 Receiving reported information

All reports, notifications and data submitted by third-party providers must be received through approved channels and logged in the Vendor Register or incident management system as applicable. The following receipt standards apply to both providers:

- **Designated receipt point:** each provider's reports are directed to the nominated Service Owner and Contract Manager for that provider. Ad hoc incident notifications must also be copied to the Head of Compliance immediately.
- **Logging:** all reports are logged against the relevant vendor record with date received, report type and version number. Incident notifications are additionally logged in the Vendor Incident Register with a unique incident ID.
- **Acknowledgement:** the Service Owner acknowledges receipt of all formal reports within two business days and confirms the report meets minimum content requirements (using the Appendix A template as the baseline).
- **Deficient reports:** where a report does not meet minimum content standards, the Service Owner returns it to the provider with a deficiency notice and a required resubmission date (within five business days for monthly reports; within two business days for incident notifications).

20.2 Internal decision-making process – Third-Party Billing and CMS Provider

Upon receipt of a report or notification from the Third-Party Billing and CMS Provider, the following internal process applies:

Step	Action	Owner	Timeframe
1	Service Owner reviews the report against KPI/SLA thresholds and flags any breach, near-miss or trend concern	Service Owner	Within 2 business days of receipt
2	Compliance review: Head of Compliance reviews life support, hardship, disconnection workflow and billing accuracy data against AER-reportable obligation thresholds; assesses whether any AER reporting obligation is triggered	Head of Compliance	Within 2 business days of receipt
3	Risk assessment: Risk & Compliance assesses whether any reported issue changes the provider's risk rating or requires escalation under Section 13	Risk & Compliance	Within 3 business days of receipt
4	Action determination: Service Owner and Head of Compliance determine required actions (e.g., cure plan, CAPA, service credit, escalation, AER notification);	Service Owner, Head of Compliance	Within 5 business days of receipt

	actions are logged in the action log with owners and due dates		
5	Vendor engagement: Contract Manager issues formal action notice to provider where required, with agreed response timeframe	Contract Manager	Within 5 business days of step 4
6	Executive briefing: where a Severity 1-2 incident or material compliance issue is identified, the CEO is briefed and the Board/ARC is notified as required by Section 13	Head of Compliance, CEO	Within 24 hours of identification
7	Monthly pack consolidation: Service Owner compiles the provider's monthly performance data into the consolidated vendor performance pack for operational leadership	Service Owner	By the 10th of each month
8	Quarterly executive pack: Contract Manager and Risk & Compliance prepare the quarterly executive review pack for Tier 1 suppliers including deep-dive on this provider	Contract Manager, Risk & Compliance	Within 10 business days before each quarterly review

20.3 Internal decision-making process – Third-Party CRM Provider

Upon receipt of a report or notification from the Third-Party CRM Provider, the following internal process applies:

Step	Action	Owner	Timeframe
1	Service Owner reviews the report against KPI/SLA thresholds for onboarding, complaints, communications and platform availability, and flags any breach or trend concern	Service Owner	Within 2 business days of receipt
2	Compliance review: Head of Compliance reviews consent capture accuracy, complaints timeliness and customer communications compliance data against NERR obligation	Head of Compliance	Within 2 business days of receipt

	thresholds; assesses AER reporting triggers		
3	Privacy review: Security/Privacy lead reviews any privacy posture report or data-handling incident notification; assesses NDB scheme obligations	Security/Privacy lead	Within 2 business days of receipt (privacy-related reports)
4	Integration review: Service Owner reviews integration performance data with the Third-Party Billing and CMS Provider and escalates cross-platform issues to both providers simultaneously if material	Service Owner	Within 3 business days of receipt
5	Action determination: Service Owner and Head of Compliance determine required actions; logged in action log with owners and due dates	Service Owner, Head of Compliance	Within 5 business days of receipt
6	Vendor engagement: Contract Manager issues formal action notice to provider where required	Contract Manager	Within 5 business days of step 5
7	Executive briefing: where a Severity 1-2 incident, material complaints spike, or privacy/data breach is identified, the CEO is briefed and Board/ARC notified as required	Head of Compliance, CEO	Within 24 hours of identification
8	Monthly and quarterly pack consolidation: same process as 20.2 steps 7-8	Service Owner, Contract Manager	As per billing provider timetable

20.4 Cross-provider coordination

Where a reported issue involves or affects both providers (e.g., a data synchronisation failure, a billing error triggered by a CRM data mismatch, or a customer complaint involving both platforms), the Service Owner convenes a joint review meeting with both providers within five business days of the issue being identified. The Head of Compliance chairs the internal cross-provider review, and a single consolidated action log entry is created covering both providers' obligations. Both providers are required under their respective MSAs to cooperate in joint incident investigation and remediation.

21. Periodic review of each third party's activities

This section sets out how Yurringa Energy periodically reviews each third party's activities to ensure they remain comprehensive, current and aligned to evolving regulatory obligations, risk profile and operational requirements. A structured review timetable and task list applies to each provider.

21.1 Third-Party Billing and CMS Provider – Periodic review timetable and tasks

Review Type	Tasks	Frequency	Owner(s)	Output
Monthly operational review	1. Review KPI/SLA performance pack against thresholds 2. Assess billing exception and reconciliation report 3. Review life support and hardship compliance report 4. Update action log: close completed items, escalate overdue items 5. Confirm no new compliance triggers	Monthly	Service Owner, Head of Compliance	Updated action log; escalation notice (if required); input to monthly vendor performance pack
Quarterly service review	1. Rolling trend analysis across all KPIs (minimum 3-month view) 2. Review open risks and control gaps 3. Assess progress on all open CAPA items 4. Review regulatory change implementation status (new NERL/NERR requirements) 5. Assess subcontractor performance and any changes 6. Review security posture and patch status 7. Confirm BCP/DR currency 8. Agree updated action priorities	Quarterly	Contract Manager, Service Owner, Risk & Compliance, Head of Compliance	Quarterly service review minutes; updated action log; quarterly executive pack input
Quarterly executive review	1. Present quarterly service review outcomes to CEO and executive 2. Review Tier 1 risk rating and confirm current tiering is appropriate 3. Address any material open issues requiring executive decision 4. Confirm resourcing adequacy for oversight 5. Approve any	Quarterly	CEO, Contract Manager, Head of Compliance	Executive review record; decisions on material issues; board reporting input

	material contract variations or exceptions			
Annual compliance audit / assurance	1. Scope and conduct an independent compliance audit or structured assurance review of the provider's controls supporting Yurringa Energy's NERL/NERR obligations 2. Test billing accuracy controls, life support workflow controls, disconnection protections, and AER reporting data extraction 3. Verify annual compliance attestation accuracy 4. Review data retention and destruction compliance 5. Assess change management logs for regulatory change implementation 6. Document findings and agree remediation plan	Annually (Q3 each year)	Risk & Compliance, Head of Compliance (may engage external auditor)	Audit report with findings, risk ratings and CAPA plan; updated risk assessment
Annual BCP/DR test review	1. Review BCP/DR test evidence 2. Assess RTO/RPO results against contracted requirements 3. Identify any gaps and require remediation plan 4. Confirm failover arrangements for MSATS and B2B market system obligations remain viable	Annually (Q4 each year)	Service Owner, Risk & Compliance	BCP/DR review record; gap remediation actions
Annual contract and risk reassessment	1. Conduct full vendor risk reassessment using tiering rubric 2. Review contract terms for currency (regulatory changes, new obligations, price indexation) 3. Assess renewal or re-tendering requirements 4. Update vendor register 5. Confirm insurance and financial viability evidence is current	Annually (at least 6 months before contract expiry)	Contract Manager, Legal, Risk & Compliance	Updated risk assessment; contract review record; renewal or re-tender recommendation

Ad hoc reassessment	Triggered by: material incident or breach; regulatory change materially affecting billing/market obligations; vendor restructuring or subcontractor change; repeated SLA failures (two consecutive periods); security incident	As triggered	Risk & Compliance, Head of Compliance	Updated risk assessment; revised oversight plan if required

21.2 Third-Party CRM Provider – Periodic review timetable and tasks

Review Type	Tasks	Frequency	Owner(s)	Output
Monthly operational review	1. Review KPI/SLA performance pack 2. Review complaints report: volume, timeliness, ombudsman escalations 3. Review consent and communications compliance reports 4. Review integration performance data with billing provider 5. Update action log	Monthly	Service Owner, Head of Compliance	Updated action log; escalation notice (if required); monthly vendor pack input
Quarterly service review	1. Rolling trend analysis across all KPIs (minimum 3-month view) 2. Complaints root cause analysis: identify systemic issues 3. Consent management audit sample: verify consent records are accurate, complete and timestamped 4. Communications compliance sample: verify NERR-required communications were issued correctly 5. Review open risks and CAPA items 6. Review regulatory change implementation status 7. Review integration health with billing provider 8. Assess	Quarterly	Contract Manager, Service Owner, Risk & Compliance, Head of Compliance, Security/Privacy lead	Quarterly service review minutes; updated action log; quarterly executive pack input

	security and privacy posture			
Quarterly executive review	1. Present quarterly service review outcomes to CEO and executive 2. Review customer outcome metrics including complaints trends 3. Address material issues requiring executive decision 4. Confirm Tier 1 risk rating remains appropriate	Quarterly	CEO, Contract Manager, Head of Compliance	Executive review record; board reporting input
Annual compliance and privacy audit / assurance	1. Scope and conduct an independent compliance and privacy audit of the provider's controls supporting Yurringa Energy's NERR customer communications and consent obligations and Privacy Act compliance 2. Test consent capture workflow controls 3. Sample customer communications for NERR compliance (content, timing, format) 4. Review complaints handling process against NERR timeframe obligations 5. Verify privacy controls, data retention/deletion, and NDB scheme readiness 6. Verify annual compliance attestation accuracy 7. Document findings and agree remediation plan	Annually (Q3 each year)	Risk & Compliance, Head of Compliance, Security/Privacy lead	Audit report with findings, risk ratings and CAPA plan; updated risk assessment
Annual integration review	1. Conduct a structured technical review of all integration points between the CRM Provider and the Billing and CMS Provider 2. Assess data synchronisation accuracy, reconciliation results and error rates over the prior 12	Annually (Q2 each year)	Service Owner (with both providers present)	Integration review record; joint CAPA plan if required

	months 3. Identify any data mapping or field-level discrepancies affecting compliance records 4. Require joint remediation plan for any identified gaps			
Annual contract and risk reassessment	1. Conduct full vendor risk reassessment 2. Review contract terms for currency 3. Assess renewal or re-tendering requirements 4. Update vendor register 5. Confirm insurance and financial viability	Annually (at least 6 months before contract expiry)	Contract Manager, Legal, Risk & Compliance	Updated risk assessment; contract review record; renewal recommendation
Ad hoc reassessment	Triggered by: material incident; regulatory change affecting customer communications or consent obligations; vendor restructuring; repeated complaints SLA failures; data/privacy breach; failed integration with billing provider	As triggered	Risk & Compliance, Head of Compliance	Updated risk assessment; revised oversight plan if required

21.3 Annual review calendar summary

The following calendar summarises the key periodic review activities across both providers to support forward planning and resourcing.

Quarter	Third-Party Billing and CMS Provider	Third-Party CRM Provider	Both Providers
Q1 (Jan–Mar)	Q1 quarterly service review + executive review; monthly operational reviews	Q1 quarterly service review + executive review; monthly operational reviews	Consolidated monthly vendor performance packs; annual contract review planning (if due)
Q2 (Apr–Jun)	Q2 quarterly service review + executive review; monthly operational reviews	Q2 quarterly service review + executive review; annual integration review (both providers)	Annual risk reassessment (if triggered); monthly vendor packs
Q3 (Jul–Sep)	Q3 quarterly service review + executive review; annual compliance audit	Q3 quarterly service review + executive review; annual compliance and privacy audit	Monthly vendor packs; audit coordination; AER half-yearly reporting (31 August)
Q4 (Oct–Dec)	Q4 quarterly service review + executive review;	Q4 quarterly service review + executive review;	Monthly vendor packs; AER half-yearly reporting

	annual BCP/DR test review; annual contract reassessment	annual BCP/DR test review; annual contract reassessment	(28 February prep); framework annual review (Section 18)

19. Third-party reporting to Yurringa Energy

This section sets out how each engaged third-party provider reports performance, compliance, incident and risk information to Yurringa Energy, including the specific tools, activities and timetables applicable to each provider. The two critical Tier 1 outsourced service providers are the Third-Party Billing and CMS Provider and the Third-Party CRM Provider. Both are subject to the Tier 1 oversight cadence in Section 12.2 and the specific requirements below.

19.1 Third-Party Billing and CMS Provider – Reporting timetable and tools

The Third-Party Billing and CMS Provider is responsible for reporting on billing system performance, market system transaction integrity, life support and hardship workflow controls, disconnection compliance, and data accuracy across all NEM jurisdictions and WA. The following timetable and tools apply.

Frequency	Reporting Activity	Tool / Mechanism	Recipient
Weekly	Operational check-in: system uptime, processing queue status, open incidents, critical alerts	Live dashboard access + structured email summary	Service Owner, Operations Manager
Weekly	Market transaction error log: failed MSATS enrolments, B2B rejections, NEM12/NEM13 exceptions	Automated exception report via secure file transfer or portal	Service Owner, Billing Operations
Monthly	Full KPI/SLA performance pack: billing accuracy rate, timely bill delivery, life support flag accuracy, disconnection workflow compliance, hardship enrolment processing times	Structured report using Appendix A template	Contract Manager, Head of Compliance
Monthly	Billing exception and reconciliation report: unbilled accounts, estimated reads, tariff configuration errors, credit balance exceptions	Data extract from billing platform + summary report	Billing Operations, Contract Manager
Monthly	Life support and hardship compliance report: registration volumes, flags applied, missed	Structured report with data fields for AER half-yearly extraction	Head of Compliance, Service Owner

	protections (if any), resolution status		
Quarterly	Executive service review pack: rolling KPI trends, open risks, audit findings, regulatory change implementation status, incident summary	Formal presentation + written pack	CEO, Head of Compliance, Contract Manager
Quarterly	Security and access review: user access rights, patch status, vulnerability remediation, cyber incident summary	Security posture report	Security/Privacy lead, Head of Compliance
Annually	Compliance attestation: written confirmation of compliance with agreed service standards, NERL/NERR obligations supported, data handling obligations, and privacy controls	Signed attestation document	Head of Compliance, Legal
Annually	BCP/DR test results: evidence of completed disaster recovery test, RTO/RPO results, identified gaps and remediation plan	Test report with evidence pack	Service Owner, Risk & Compliance
Annually	Subcontractor disclosure: updated list of subcontractors with roles, data access and contractual flow-down status	Written disclosure with supporting evidence	Legal, Risk & Compliance
Ad hoc / within 24 hours	Incident notification: any system outage, data integrity failure, processing error or security incident with material compliance impact	Immediate verbal notification followed by written incident report within 24 hours	Service Owner, Head of Compliance
Ad hoc / within 5 business days	Post-incident RCA report: root cause analysis for Severity 1-2 incidents with CAPA plan	Written RCA report using approved template	Head of Compliance, Contract Manager

19.2 Third-Party CRM Provider – Reporting timetable and tools

The Third-Party CRM Provider is responsible for reporting on customer onboarding and consent management, digital communications delivery, complaints handling performance, and CRM platform availability. The following timetable and tools apply.

Frequency	Reporting Activity	Tool / Mechanism	Recipient
Weekly	Operational check-in: platform uptime, active customer counts, onboarding queue, open complaints, system alerts	Live dashboard access + structured email summary	Service Owner, Customer Operations Manager
Weekly	Complaints status report: new complaints received, resolved, overdue, escalated to ombudsman (if any)	Automated report from CRM complaints module	Service Owner, Head of Compliance
Monthly	Full KPI/SLA performance pack: onboarding completion rate, consent capture accuracy, communications delivery rate, complaints resolution timeliness, digital self-service availability	Structured report using Appendix A template	Contract Manager, Head of Compliance
Monthly	Consent and disclosure compliance report: explicit informed consent capture rates, failed or incomplete consent workflows, marketing consent management status	Data extract from CRM + summary report	Head of Compliance, Legal
Monthly	Customer communications compliance report: NERR-required communications issued on time, failed deliveries, bounce/undeliverable rates, corrective actions	Communications delivery report from CRM/digital platform	Head of Compliance, Service Owner
Quarterly	Executive service review pack: rolling KPI trends, open risks, complaints analytics and root cause insights, regulatory change	Formal presentation + written pack	CEO, Head of Compliance, Contract Manager

	implementation status, incident summary		
Quarterly	Security and privacy posture report: access rights review, data handling compliance, privacy incident summary, NDB scheme status	Security/privacy report	Security/Privacy lead, Head of Compliance
Quarterly	Integration performance report: data synchronisation accuracy with Third-Party Billing and CMS Provider, failed data transfers, reconciliation status	Technical integration report	Service Owner, Billing Operations
Annually	Compliance attestation: written confirmation of compliance with NERR customer communications obligations, Privacy Act (Cth), consent management standards, and agreed service standards	Signed attestation document	Head of Compliance, Legal
Annually	BCP/DR test results and subcontractor disclosure	Test report + written disclosure	Service Owner, Risk & Compliance
Ad hoc / within 24 hours	Incident notification: platform outage, failed mass communications, consent data integrity failure, data breach or security incident	Immediate verbal notification + written report within 24 hours	Service Owner, Head of Compliance
Ad hoc / within 5 business days	Post-incident RCA report for Severity 1-2 incidents	Written RCA using approved template	Head of Compliance, Contract Manager

20. Receiving, considering and acting on reported information

This section establishes how Yurringa Energy receives, reviews, considers and acts on information reported by each third-party provider, including the internal decision-making process for each provider.

20.1 Receiving reported information

All reports, notifications and data submitted by third-party providers must be received through approved channels and logged in the Vendor Register or incident management system as applicable. The following receipt standards apply to both providers:

- **Designated receipt point:** each provider's reports are directed to the nominated Service Owner and Contract Manager for that provider. Ad hoc incident notifications must also be copied to the Head of Compliance immediately.
- **Logging:** all reports are logged against the relevant vendor record with date received, report type and version number. Incident notifications are additionally logged in the Vendor Incident Register with a unique incident ID.
- **Acknowledgement:** the Service Owner acknowledges receipt of all formal reports within two business days and confirms the report meets minimum content requirements (using the Appendix A template as the baseline).
- **Deficient reports:** where a report does not meet minimum content standards, the Service Owner returns it to the provider with a deficiency notice and a required resubmission date (within five business days for monthly reports; within two business days for incident notifications).

20.2 Internal decision-making process – Third-Party Billing and CMS Provider

Upon receipt of a report or notification from the Third-Party Billing and CMS Provider, the following internal process applies:

Step	Action	Owner	Timeframe
1	Service Owner reviews the report against KPI/SLA thresholds and flags any breach, near-miss or trend concern	Service Owner	Within 2 business days of receipt
2	Compliance review: Head of Compliance reviews life support, hardship, disconnection workflow and billing accuracy data against AER-reportable obligation thresholds; assesses whether any AER reporting obligation is triggered	Head of Compliance	Within 2 business days of receipt
3	Risk assessment: Risk & Compliance assesses whether any reported issue changes the provider's risk rating or requires escalation under Section 13	Risk & Compliance	Within 3 business days of receipt
4	Action determination: Service Owner and Head of Compliance determine required actions (e.g., cure	Service Owner, Head of Compliance	Within 5 business days of receipt

	plan, CAPA, service credit, escalation, AER notification); actions are logged in the action log with owners and due dates		
5	Vendor engagement: Contract Manager issues formal action notice to provider where required, with agreed response timeframe	Contract Manager	Within 5 business days of step 4
6	Executive briefing: where a Severity 1-2 incident or material compliance issue is identified, the CEO is briefed and the Board/ARC is notified as required by Section 13	Head of Compliance, CEO	Within 24 hours of identification
7	Monthly pack consolidation: Service Owner compiles the provider's monthly performance data into the consolidated vendor performance pack for operational leadership	Service Owner	By the 10th of each month
8	Quarterly executive pack: Contract Manager and Risk & Compliance prepare the quarterly executive review pack for Tier 1 suppliers including deep-dive on this provider	Contract Manager, Risk & Compliance	Within 10 business days before each quarterly review

20.3 Internal decision-making process – Third-Party CRM Provider

Upon receipt of a report or notification from the Third-Party CRM Provider, the following internal process applies:

Step	Action	Owner	Timeframe
1	Service Owner reviews the report against KPI/SLA thresholds for onboarding, complaints, communications and platform availability, and flags any breach or trend concern	Service Owner	Within 2 business days of receipt
2	Compliance review: Head of Compliance reviews consent capture accuracy, complaints timeliness and customer communications compliance	Head of Compliance	Within 2 business days of receipt

	data against NERR obligation thresholds; assesses AER reporting triggers		
3	Privacy review: Security/Privacy lead reviews any privacy posture report or data-handling incident notification; assesses NDB scheme obligations	Security/Privacy lead	Within 2 business days of receipt (privacy-related reports)
4	Integration review: Service Owner reviews integration performance data with the Third-Party Billing and CMS Provider and escalates cross-platform issues to both providers simultaneously if material	Service Owner	Within 3 business days of receipt
5	Action determination: Service Owner and Head of Compliance determine required actions; logged in action log with owners and due dates	Service Owner, Head of Compliance	Within 5 business days of receipt
6	Vendor engagement: Contract Manager issues formal action notice to provider where required	Contract Manager	Within 5 business days of step 5
7	Executive briefing: where a Severity 1-2 incident, material complaints spike, or privacy/data breach is identified, the CEO is briefed and Board/ARC notified as required	Head of Compliance, CEO	Within 24 hours of identification
8	Monthly and quarterly pack consolidation: same process as 20.2 steps 7-8	Service Owner, Contract Manager	As per billing provider timetable

20.4 Cross-provider coordination

Where a reported issue involves or affects both providers (e.g., a data synchronisation failure, a billing error triggered by a CRM data mismatch, or a customer complaint involving both platforms), the Service Owner convenes a joint review meeting with both providers within five business days of the issue being identified. The Head of Compliance chairs the internal cross-provider review, and a single consolidated action log entry is created covering both providers' obligations. Both providers are required under their respective MSAs to cooperate in joint incident investigation and remediation.

21. Periodic review of each third party's activities

This section sets out how Yurringa Energy periodically reviews each third party's activities to ensure they remain comprehensive, current and aligned to evolving regulatory obligations, risk profile and operational requirements. A structured review timetable and task list applies to each provider.

21.1 Third-Party Billing and CMS Provider – Periodic review timetable and tasks

Review Type	Tasks	Frequency	Owner(s)	Output
Monthly operational review	1. Review KPI/SLA performance pack against thresholds 2. Assess billing exception and reconciliation report 3. Review life support and hardship compliance report 4. Update action log: close completed items, escalate overdue items 5. Confirm no new compliance triggers	Monthly	Service Owner, Head of Compliance	Updated action log; escalation notice (if required); input to monthly vendor performance pack
Quarterly service review	1. Rolling trend analysis across all KPIs (minimum 3-month view) 2. Review open risks and control gaps 3. Assess progress on all open CAPA items 4. Review regulatory change implementation status (new NERL/NERR requirements) 5. Assess subcontractor performance and any changes 6. Review security posture and patch status 7. Confirm BCP/DR currency 8. Agree updated action priorities	Quarterly	Contract Manager, Service Owner, Risk & Compliance, Head of Compliance	Quarterly service review minutes; updated action log; quarterly executive pack input
Quarterly executive review	1. Present quarterly service review outcomes to CEO and executive 2. Review Tier 1 risk rating and confirm current tiering is appropriate 3. Address any material open issues requiring executive decision 4. Confirm resourcing adequacy for oversight 5. Approve any	Quarterly	CEO, Contract Manager, Head of Compliance	Executive review record; decisions on material issues; board reporting input

	material contract variations or exceptions			
Annual compliance audit / assurance	1. Scope and conduct an independent compliance audit or structured assurance review of the provider's controls supporting Yurringa Energy's NERL/NERR obligations 2. Test billing accuracy controls, life support workflow controls, disconnection protections, and AER reporting data extraction 3. Verify annual compliance attestation accuracy 4. Review data retention and destruction compliance 5. Assess change management logs for regulatory change implementation 6. Document findings and agree remediation plan	Annually (Q3 each year)	Risk & Compliance, Head of Compliance (may engage external auditor)	Audit report with findings, risk ratings and CAPA plan; updated risk assessment
Annual BCP/DR test review	1. Review BCP/DR test evidence 2. Assess RTO/RPO results against contracted requirements 3. Identify any gaps and require remediation plan 4. Confirm failover arrangements for MSATS and B2B market system obligations remain viable	Annually (Q4 each year)	Service Owner, Risk & Compliance	BCP/DR review record; gap remediation actions
Annual contract and risk reassessment	1. Conduct full vendor risk reassessment using tiering rubric 2. Review contract terms for currency (regulatory changes, new obligations, price indexation) 3. Assess renewal or re-tendering requirements 4. Update vendor register 5. Confirm insurance and financial viability evidence is current	Annually (at least 6 months before contract expiry)	Contract Manager, Legal, Risk & Compliance	Updated risk assessment; contract review record; renewal or re-tender recommendation

Ad hoc reassessment	Triggered by: material incident or breach; regulatory change materially affecting billing/market obligations; vendor restructuring or subcontractor change; repeated SLA failures (two consecutive periods); security incident	As triggered	Risk & Compliance, Head of Compliance	Updated risk assessment; revised oversight plan if required

21.2 Third-Party CRM Provider – Periodic review timetable and tasks

Review Type	Tasks	Frequency	Owner(s)	Output
Monthly operational review	1. Review KPI/SLA performance pack 2. Review complaints report: volume, timeliness, ombudsman escalations 3. Review consent and communications compliance reports 4. Review integration performance data with billing provider 5. Update action log	Monthly	Service Owner, Head of Compliance	Updated action log; escalation notice (if required); monthly vendor pack input
Quarterly service review	1. Rolling trend analysis across all KPIs (minimum 3-month view) 2. Complaints root cause analysis: identify systemic issues 3. Consent management audit sample: verify consent records are accurate, complete and timestamped 4. Communications compliance sample: verify NERR-required communications were issued correctly 5. Review open risks and CAPA items 6. Review regulatory change implementation status 7. Review integration health with billing provider 8. Assess	Quarterly	Contract Manager, Service Owner, Risk & Compliance, Head of Compliance, Security/Privacy lead	Quarterly service review minutes; updated action log; quarterly executive pack input

	security and privacy posture			
Quarterly executive review	1. Present quarterly service review outcomes to CEO and executive 2. Review customer outcome metrics including complaints trends 3. Address material issues requiring executive decision 4. Confirm Tier 1 risk rating remains appropriate	Quarterly	CEO, Contract Manager, Head of Compliance	Executive review record; board reporting input
Annual compliance and privacy audit / assurance	1. Scope and conduct an independent compliance and privacy audit of the provider's controls supporting Yurringa Energy's NERR customer communications and consent obligations and Privacy Act compliance 2. Test consent capture workflow controls 3. Sample customer communications for NERR compliance (content, timing, format) 4. Review complaints handling process against NERR timeframe obligations 5. Verify privacy controls, data retention/deletion, and NDB scheme readiness 6. Verify annual compliance attestation accuracy 7. Document findings and agree remediation plan	Annually (Q3 each year)	Risk & Compliance, Head of Compliance, Security/Privacy lead	Audit report with findings, risk ratings and CAPA plan; updated risk assessment
Annual integration review	1. Conduct a structured technical review of all integration points between the CRM Provider and the Billing and CMS Provider 2. Assess data synchronisation accuracy, reconciliation results and error rates over the prior 12	Annually (Q2 each year)	Service Owner (with both providers present)	Integration review record; joint CAPA plan if required

	months 3. Identify any data mapping or field-level discrepancies affecting compliance records 4. Require joint remediation plan for any identified gaps			
Annual contract and risk reassessment	1. Conduct full vendor risk reassessment 2. Review contract terms for currency 3. Assess renewal or re-tendering requirements 4. Update vendor register 5. Confirm insurance and financial viability	Annually (at least 6 months before contract expiry)	Contract Manager, Legal, Risk & Compliance	Updated risk assessment; contract review record; renewal recommendation
Ad hoc reassessment	Triggered by: material incident; regulatory change affecting customer communications or consent obligations; vendor restructuring; repeated complaints SLA failures; data/privacy breach; failed integration with billing provider	As triggered	Risk & Compliance, Head of Compliance	Updated risk assessment; revised oversight plan if required

21.3 Annual review calendar summary

The following calendar summarises the key periodic review activities across both providers to support forward planning and resourcing.

Quarter	Third-Party Billing and CMS Provider	Third-Party CRM Provider	Both Providers
Q1 (Jan–Mar)	Q1 quarterly service review + executive review; monthly operational reviews	Q1 quarterly service review + executive review; monthly operational reviews	Consolidated monthly vendor performance packs; annual contract review planning (if due)
Q2 (Apr–Jun)	Q2 quarterly service review + executive review; monthly operational reviews	Q2 quarterly service review + executive review; annual integration review (both providers)	Annual risk reassessment (if triggered); monthly vendor packs
Q3 (Jul–Sep)	Q3 quarterly service review + executive review; annual compliance audit	Q3 quarterly service review + executive review; annual compliance and privacy audit	Monthly vendor packs; audit coordination; AER half-yearly reporting (31 August)
Q4 (Oct–Dec)	Q4 quarterly service review + executive review;	Q4 quarterly service review + executive review;	Monthly vendor packs; AER half-yearly reporting

	annual BCP/DR test review; annual contract reassessment	annual BCP/DR test review; annual contract reassessment	(28 February prep); framework annual review (Section 18)

Appendix A: KPI/SLA reporting pack (minimum fields)

- Supplier/service overview: tier, scope, contract term, renewal date.
- KPI/SLA dashboard: current month and rolling trend.
- Incidents: volume, severity, time to resolve, open major incidents.
- Changes: major changes, failed changes, upcoming releases.
- Risk & compliance: open risks, attestations, control tests, audit findings.
- Security: vulnerabilities, access review status, security incidents.
- Customer outcomes: complaints, CSAT, escalations attributable to vendor.
- Financials: spend, credits, disputes, forecasted exposure.
- Action log: new, closed, overdue items and owners.

Appendix B: Vendor tiering rubric (summary)

Assign tiers using the highest applicable risk factor: customer harm potential, regulatory impact, data sensitivity, system criticality, and substitutability. Tier 1–2 require formal assurance and executive oversight.

Appendix C: Action log and remediation tracker (minimum)

- Action ID and linked incident/risk/control.
- Description, owner, due date, status and evidence link.
- Customer impact assessment and remediation status (if applicable).
- Validation method and closure approver.

DigiU Capability Summary

About Us

DigiU is a digital innovation and transformation group dedicated to helping businesses scale, transform, and thrive through technology and talent.

Highly experienced & delivery focused team at DigiU is made up of professionals who have spent their careers in the energy and utilities sector from fast-moving startups to top-tier gentailers and retailers. Innovation and technology are in our
DNA.

We understand the industry inside out from customer acquisition, customer management to operations, collections & compliance obligations. By combining this deep sector knowledge with expertise in operations, people, platforms, and transformation, we deliver measurable outcomes that drive lasting value.

Our Services & Products.

DigiTalent

Our extensive network of technical professionals spans a wide range of expertise, including IT, software development, cybersecurity, data analytics, project management and more. Whatever your specialisation needs, we have the talent to match.

DigiTransform

Our digital transformation strategies are designed to optimise operational processes, plug revenue leakages. We deliver faster & smarter outcomes by improving cash collections, user and employee experience, and overall business performance. By integrating AI, machine learning and intelligent automation.

NOVA

Our Customers

DigiOps

By using AI, RPA, and smart automation, DigiOps manages the entire back-of-house operations for energy retailers; including billing, transfers, and meter data management. Our intelligent automation ecosystem continuously learns and optimises, ensuring every process becomes faster, smarter, and more accurate over time.

DigiLabs

DigiLabs brings premium technology and modern design within reach. Our team of expert designers and developers craft slick, intuitive platforms and mobile apps with a modern, “cool” look; all aligned to your brand and budget. We deliver custom applications that blend modern tech with exceptional UX.

compliX

PLANIFY

02

software. It streamlines revenue recovery

pricing platform enabling energy

platform for energy retailers, automating

Nova is an AI based debt collection

Planify is a smart product and

CompliX is a compliance management

through intelligent automation, analytics, pricing effeciently & accurately.

retailers and brokers to manage reporting, and audit readiness.

regulatory workflows, breach tracking, and AI-driven insights.

Talent

DigiTalent provides highly skilled professionals who deliver short- to medium-term transformation projects for energy retailers and multinational organisations. Our talent pool includes:

- **Project managers**
- **Business analysts**
- **Solution architects**
- **Data analysts/Visualisation Specialists**
- **Testers/QA**
- **Software developers**
- **AI/ML engineers**
- **Compliance Uplift specialists**

Each bringing deep industry experience and technical expertise.

Professionals at DigiU have successfully managed and implemented initiatives such as

- **Billing migrations,**
- **New billing system implementations**
- **Quote-to-Cash process maping & optimisation**

Ensuring seamless integration, accuracy, and efficiency. They have also led AI and automation deployments in contact centres, driving improved customer experience and operational performance.

We have supported clients in the delivery of product and pricing portals, as well as regulatory and compliance programs including payment difficulty frameworks, life support management, and fraud detection and prevention.

Transform

Our experience spans the full lifecycle of digital and billing transformation projects across the utilities sector. Some of the key projects that DigiU delivered in record times while staying within budget are:

Key projects

Billing Migration Projects involving Tally, Orion, Engage New Billing system implementation Quote to Cash - process mapping & gap analysis AI implementation in the contact centre environment Setting up end to end processes & billing system for a start up energy retailer Customer onboarding CRM - Custom development + implementation

Product & Pricing portal - Development + Implementation Best offer Rule changes - Project Management

Payment difficulty framework - Implementation & Enhancement Project management of Regulatory undertaking by energy retailers Concession & Life support modules.

AI based Quality assurance system - Implementation QA of billing system enhancements

Project Management of direct debit & payment enhancement projects.

Fraud investigations - Analysis & PM

Case Study: Streamlining Quote-to-Cash for a Victorian Energy Retailer

DigiU's team mapped the entire quote-to-cash process for a major Victorian energy retailer, uncovering regulatory and compliance vulnerabilities, operational inefficiencies, and over $4 million in annual revenue leakage, with potential exposure of up to $10 million.

By implementing AI-driven automation, SaaS tools, and RPA, we digitised and optimised critical workflows. The result:

- **$2 reduction in OPEX per account per month**
- **Fully documented, compliant processes**
- **An AI-enabled knowledge management system ensuring continuous improvement**
- **Enhanced customer self-serve and QA processes**

Outcome: Lower cost-to-serve, stronger compliance posture, and significant revenue recovery across the customer lifecycle.

04

Ops

Customer Onboarding & Transfers

Managing market offers, pricing, product setup, and welcome packs while overseeing customer verification (identity, address, life support status, and concessions) and coordinating transfers, move-ins, and new connections via MSATS.

Billing, Meter data & Service Orders

Processing meter data from AEMO to generate and issue accurate bills for electricity, dual fuel, and embedded networks, while managing multiple payment channels (direct debit, BPAY, Centrepay, credit cards) and overseeing revenue assurance, debt management, and credit control.

Market Operations & Settlements

Submitting and reconciling energy transactions within AEMO's market framework while managing settlement statements, prudential requirements, and loss factors, and handling reallocations and corrections for metering and network charges.

Compliance & Regulatory Reporting

Maintaining compliance with AER, ESC (Victoria), and AEMC requirements by managing regulatory obligations such as the Payment Difficulty Framework, Clear Advice Entitlement, Best Offer on bills, Life Support Obligations, and Hardship Programs, while preparing regulatory reports and supporting audits.

Customer Experience

Providing AI-led omni-channel customer service across voice, digital, and chat platforms while managing complaints, hardship cases, and dispute resolution, conducting satisfaction and NPS monitoring, and implementing AI-driven quality assurance on calls.

Debt Collection & Credit Management

Monitoring arrears and credit risk using predictive models and segmentation to prioritise collections, while managing external agencies and field collections for disconnections and occupier accounts, and ensuring compliance with hardship and disconnection rules.

Technology, Data & Digital Enablement

Managing CRM, billing, and market system integrations (including MSATS, B2B, and B2M) while implementing automation (RPA) and AI for customer and billing workflows, leveraging data analytics for forecasting, churn prediction, and compliance insights, and ensuring cybersecurity, data privacy, and ISO 27001 governance.

Finance & OPEX Management

Managing margin, operating expenditure, and bad debt ratios while reporting on revenue recognition and provisioning, and driving operational efficiency through continuous process improvement and automation.

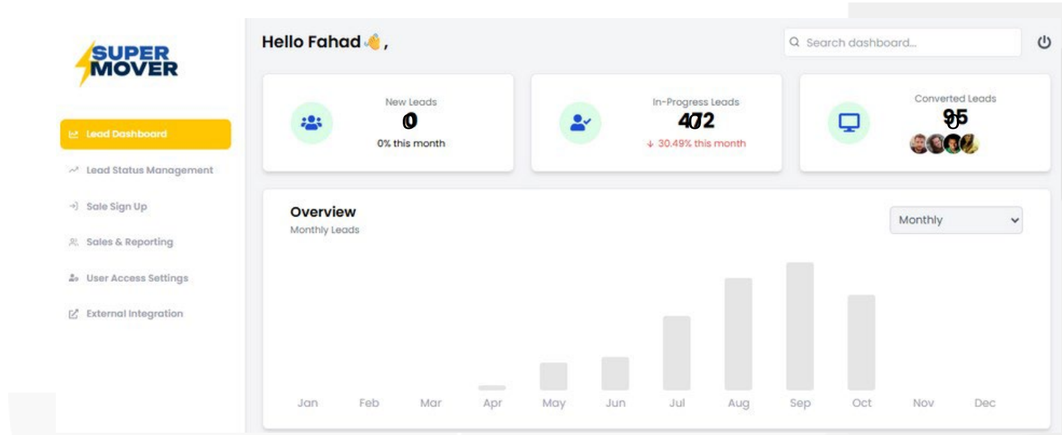
DigiOps Case Study – Tier 2 National Retailer- Occupiers As a Service

DigiU has continuously prioritised occupier accounts, also known as "Vacant consumption". As a result, we have successfully cut the average debt of each occupier accounts by **62%** and delivered a ROI of **$1.4m** in a span of 6 months. This showcases our ability to tackle unidentified accounts through a unique, data-driven approach; addressing a challenge that costs retailers millions in annual revenue leakage.

Labs

DigiLabs delivers affordable excellence in the design and development of applications, CRMs, and custom technology platforms tailored for the utilities sector and beyond. Our team combines innovation with practicality, building scalable, secure, and user-focused solutions that drive efficiency, enhance data visibility, and improve customer engagement. From concept to deployment, DigiLabs transforms complex operational needs into intuitive digital systems that enable smarter decision-making and sustainable business growth.

DigiLabs Case Study Super Mover – Connecting Homes with Ease



Super Mover simplifies the moving experience by connecting electricity, gas, and

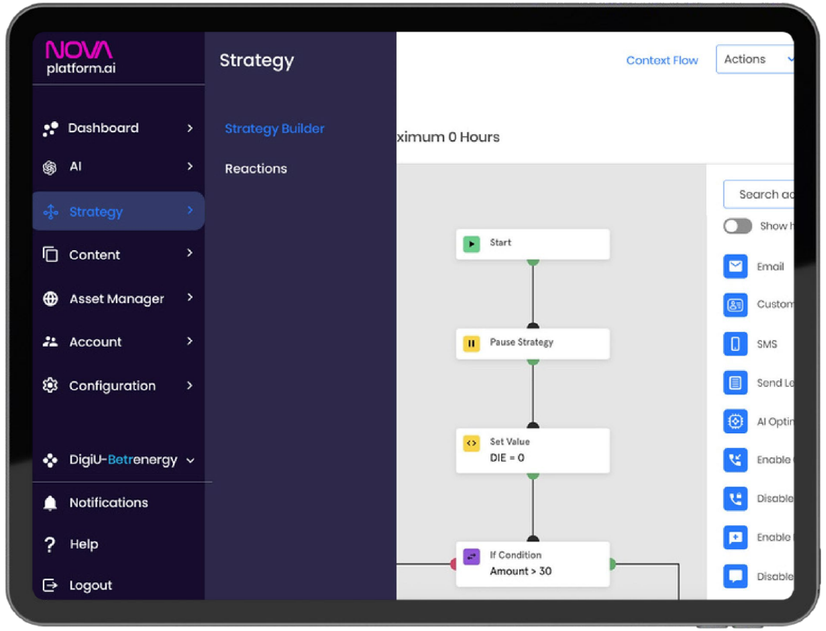
internet services all for free. DigiU partnered with Super Mover to **design, build**, and **launch** a fully integrated digital platform within **eight weeks**, connecting leading Australian energy retailers through real-time API integrations. The result is a seamless customer experience that streamlines service setup and reduces manual processing. Following the successful launch, DigiU and Super Mover have formed an ongoing partnership to enhance the platform further, integrating DigiU's **Planify** technology and future **AI automation** to accelerate speed-to-market and drive continuous innovation.

Product

DigiCollect
NOVA platform.ai

Collections Reinvented

Smart collections technology for utilities and industries. Respectful, datadriven, and always compliant because your customers matter. AI, automation, and digital engagement aren’t just trends; they’re transforming how organisations recover debt, retain customers, and remain compliant. DigiCollect uses AI-powered insights to streamline collections, optimise workflows, and protect both revenue and relationships.



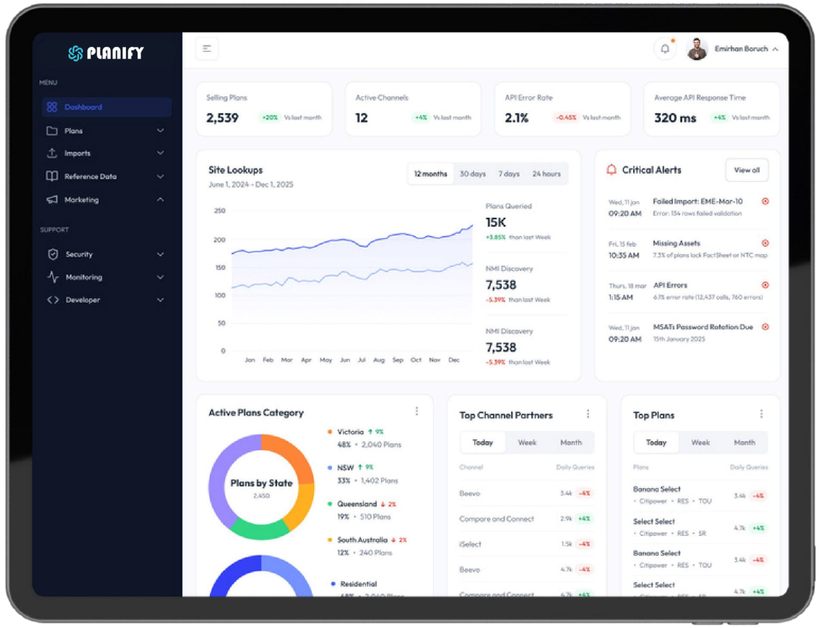
Product

07

PLANIFY

API-driven planning and pricing platform for energy retailers

In today’s fast-moving energy market, staying ahead means having real-time, automated, and error-free pricing and compliance solutions. Planify delivers a seamless, AI-enabled platform ensuring real-time pricing, effortless integrations, and compliance-first accuracy. By eliminating inefficiencies, it gives retailers the competitive edge they need to thrive.

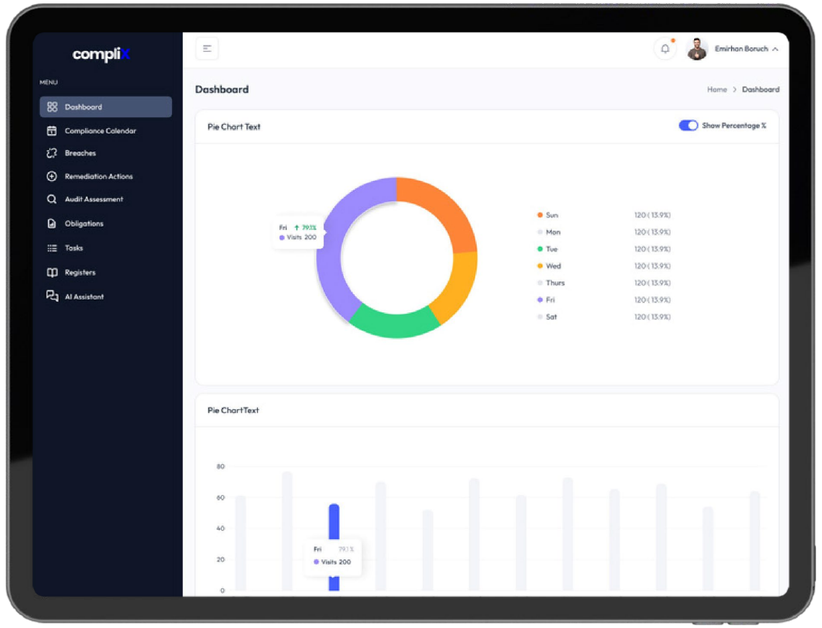


Product

compliX

Compliance and audit management made simple.

A purpose-built platform to simplify regulatory management across retail, networks, and embedded operations. Whether managing National Energy Retail Law (NERL), jurisdictional obligations, life support compliance, or audit schedules, compliX brings structure, visibility, and automation to your entire compliance lifecycle. Say goodbye to spreadsheets, guesswork, and siloed teams. compliX puts you back in control.



DigiU’s Leadership Team

Fahad Liaqat

CEO

[redacted]

Fahad is the Founder and CEO of DigiU and has over 16 years of experience in the Australian energy sector. With a proven leadership record across multiple Australian energy retailers, Fahad has led major technology and operations teams, delivering large-scale regulatory projects and modernising billing and customer systems to support strong business growth & highly optimised retail operations.
A recognised champion of using technology to drive operational efficiency, Fahad was instrumental in launching innovative platforms such as DigiCollect, Planify, and CompliX, helping utilities automate compliance, optimise collections, and transform customer experiences

Aleksander Vuckovic

Chief Technology Officer

Aleksander Vuckovic is a seasoned technology leader with over **10 years** of experience delivering custom and SaaS software solutions in the Australian energy and utilities industry. As Chief Technology Officer at DigiU, he leads technology transformation, software development, and digital innovation across billing, CRM, and customer experience platforms. Previously, Aleksander held senior roles at **Tango Energy, Agility CIS & Tally IT**, where he led major technology programs, development of Energy billing & CIS platforms, and product implementations. He is recognised for bridging technical and business strategy, leading high-performing teams, and delivering scalable, futureproof solutions that enhance efficiency and compliance across the energy sector. Having worked for billing vendors as a software developer, solution architect, and product owner, and later for energy retailers as Head of Delivery, Aleks brings a unique dual perspective; understanding both the technology build side and the operational realities of retail energy businesses.

Taran Mahal

Principal Consultant

An engineer turned seasoned project manager, Taran has built a strong reputation for delivering complex, high-impact projects across the energy, technology, and healthcare sectors. At DigiU, Taran managed compliance uplift and regulatory remediation programs for a Tier2 energy retailer, successfully closing more than 55 compliance matters, leading multi-disciplinary teams, and implementing sustainable process and system controls. Previously, as Project Manager at Access Telehealth, he delivered a cloud-based auto-scheduling and billing platform. His earlier experience at **Tally Group**, **Jemena, Energy Australia**, and **Simply Energy** further strengthened his expertise in CRM and billing systems, automation, and large-scale digital transformation.
Known for his adaptability, attention to detail, and results-driven leadership, Taran thrives in dynamic, fast-paced environments. He bridges strategy with execution, ensuring technology initiatives deliver measurable value, compliance assurance, and lasting business impact.

Jan Xavier Gonzales

Principal Consultant / Delivery Leader

With over **20 years** of experience across the energy, utilities, and technology sectors, Jan is a strategic consultant and delivery leader known for transforming complex business challenges into scalable, future-ready solutions. As a Senior Consultant at DigiU, he leads high-impact transformation programs across credit & collections projects, credit remediation, regulatory uplift, and operational optimisation, aligning digital delivery with commercial goals, compliance frameworks, and customer experience outcomes. Jan’s expertise spans organisational change, operating model design, Credit & collections, digital transformation, and regulatory compliance.
Before joining DigiU, Jan held senior project delivery roles at **Service Stream, Origin Energy, AGL**, and **SAP**, where he led large-scale system integrations, credit and collections strategy uplifts, and digital enablement initiatives, involving **SAP & Kraken** systems.

Currently completing his executive MBA, Jan brings a balanced approach to consulting combining strategic foresight, operational discipline, and commercial insight to help organisations achieve transformation with confidence and clarity.

shape the digital future of Australia’s energy retail landscape.

12

Some of Our Friends We Work With

We are proud to partner with organisations that share our vision for the future. From industry leaders to utilities innovators, these partnerships reflect the trust placed in DigiU to deliver quality, efficiency, and results.

receeve

uniphore

arcenergy GROUP

TotalEnergies

QENDERCORE

NOVA

Contact us today.

To discover how we can help transform your business and drive superior outcomes for your organisation.

info@digiu.co

www.digiu.com.au

Yurringa Energy

Level 1, Suite 1, 116 Rokeby Street

Collingwood, 3066

I, Arron Wood of Level 1, 1/116 Rokeby Street, Collingwood Victoria 3066, being Chief Executive Officer of Yurringa Energy Pty Ltd, declare that Yurringa Energy Pty Ltd, Yurringa Energy Pty Ltd's associates, any other business where, Yurringa Energy Pty Ltd's officers have held an officer position and any other entity that exerts control over Yurringa Energy Pty Ltd has not had:

- Any material failure to comply with regulatory requirements, laws or other obligations over the previous 10 years, including infringement notices or other enforcement action (including voluntary administrative undertakings) being taken by a regulatory body. I acknowledge that:
    - Yurringa Pty Ltd, of which Daniel Briggs is a Director, appointed a Restructuring Practitioner on the 5th of May 2025.
    - The Restructuring Practitioner was terminated on the 15th July 2025, after successful completion of the Restructuring Plan and fulfillment of the Company's obligations therein (14th July 2025).
    - Zen Energy Pty Ltd, of which Domenic Capomolla is a Director (currently suspended due to voluntary administration), entered voluntary administration on the 3rd of July 2026.
- Any previously revoked authorisations, authorities or licences held in any industry. I acknowledge that:
    - Zen Energy Retail Pty Ltd, of which Domenic Capomolla is a Director (currently suspended due to voluntary administration), had its authorisation revoked on the 6th of July 2026.
- Any failed authorisation, authority, or licence applications in any industry.
- Any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry.
- Any situation where Yurringa Energy Pty Ltd or an associate of Yurringa Energy Pty Ltd has previously triggered the RoLR provisions of the Retail Law or equivalent state/territory/foreign legislation , or have transferred or surrendered an authorisation or licence in circumstances where if not done, triggering a RoLR event would have been likely.

[redacted]

Signature of authorised representative

Name Arron Wood

Date 06/08/2026

[redacted]

Signature of witness

Name Martin Walton

Date 06/08/2026

Yurringa Energy

Level 1, Suite 1, 116 Rokeby Street

Collingwood, 3066

I, Arron Wood of Level 1, 1/116 Rokeby Street, Collingwood Victoria 3066, being Chief Executive Officer of Yurringa Energy Pty Ltd, declare that Yurringa Energy Pty Ltd's current director/s (or shadow / de facto director/s), and any other person that exerts control over Yurringa Energy Pty Ltd's business activities and all persons who are responsible for significant operating decisions for Yurringa Energy Pty Ltd have not committed or been the subject of any offence or successful prosecution under any territory, state, Commonwealth or foreign legislation (including, but not limited to, the *Australian Securities and Investments Commission Act 2001* (Cth), *Competition and Consumer Act 2010* (Cth) and the *Corporations Act 2001* (Cth), relevant to Yurringa Energy Pty Ltd's capacity as an energy retailer.

[redacted]

Signature of authorised representative

[redacted]

Signature of witness

Arron Wood

Name

Daniel Briggs

Name

21/01/2026

Date

21/01/2026

Date

Yurringa Energy

Level 1, Suite 1, 116 Rokeby Street

Collingwood, 3066

I, Arron Wood of Level 1, 1/116 Rokeby Street, Collingwood Victoria 3066, being Chief Executive Officer of Yurringa Energy Pty Ltd, declare that:

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

[redacted]

Signature of authorised representative

[redacted]

Signature of witness

Arron Wood

Name

Daniel Briggs

Name

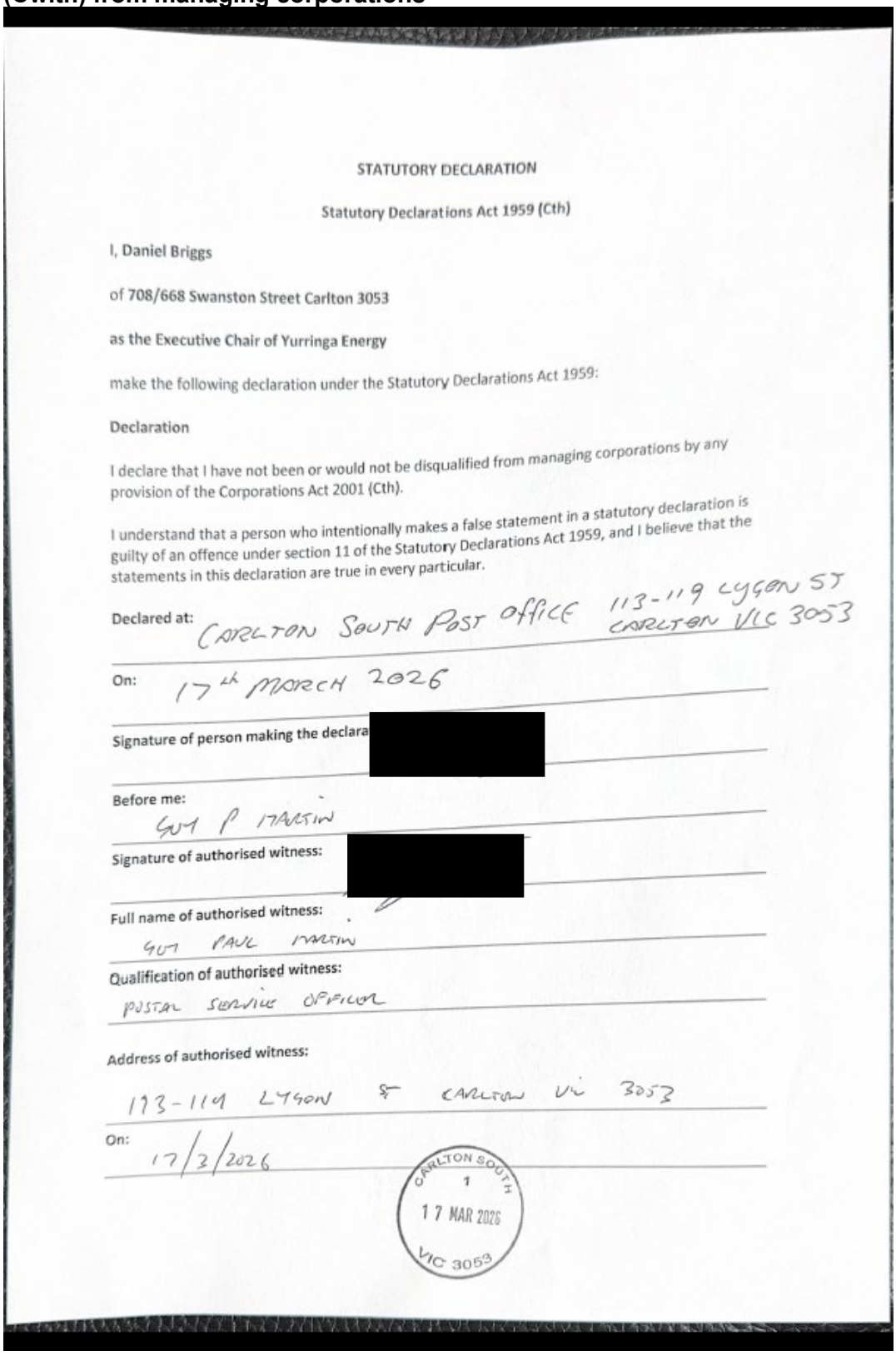
21/01/2026

Date

21/01/2026

Date

Attachment 49
A statutory declaration from all the company directors or principals of the entity that they have not been or would not be disqualified under the Corporations Act 2001 (Cwlth) from managing corporations



STATUTORY DECLARATION

Statutory Declarations Act 1959 (Cth)

I, Daniel Briggs

of 708/668 Swanston Street Carlton 3053

as the Executive Chair of Yurringa Energy

make the following declaration under the Statutory Declarations Act 1959:

Declaration

I declare that I have not been or would not be disqualified from managing corporations by any provision of the Corporations Act 2001 (Cth).

I understand that a person who intentionally makes a false statement in a statutory declaration is guilty of an offence under section 11 of the Statutory Declarations Act 1959, and I believe that the statements in this declaration are true in every particular.

Declared at: CARLTON SOUTH POST OFFICE 113-119 LYGON ST CARLTON VIC 3053

On: 17th MARCH 2026

Signature of person making the declara [redacted]

Before me: GUY P MARTIN

Signature of authorised witness: [redacted]

Full name of authorised witness: GUY PAUL MARTIN

Qualification of authorised witness: POSTAL SERVICE OFFICER

Address of authorised witness: 113-119 LYGON ST CARLTON VIC 3053

On: 17/3/2026

CARLTON SOUTH 1 17 MAR 2026 VIC 3053

STANNARDS

Written declaration by independent auditor to

the Member of Yurringa Energy Pty Ltd

Conclusion

Based on our review of the documents and information listed in the basis of conclusion section, together with the Company management representations provided to us, and subject to the qualifications and limitations set out in this letter, we declare that:

(a) an insolvency official has not been appointed in respect of the business or any property of the business;

(b) no application or order has been made, resolution has been passed, or steps have been taken to pass a resolution to wind up or dissolve the business; and

(c) we are not aware of any other factors that would impede the Company's ability to finance the activities required by the licence.

Basis for conclusion

Our conclusion is based on our review of the following documents and information:

i. Balance sheet as at 30 April 2026;

ii. Bank statement as at 30 April 2026;

iii. Executed subscription agreement and Deed of Accession entered into between [redacted];

iv. Written confirmation from [redacted];

v. [redacted]

2028; vi. Management assessment on the recoverability of amounts receivable;

vii. [redacted]; and

viii. Company management representations.

T: (03) 9867 4433
E: audit@stannards.com.au
60 Toorak Rd, South Yarra VIC 3141
www.stannards.com.au
Stannards Audit Pty Ltd ABN: 24 683 552 874

STANNARDS

Basis and limitations

This declaration has been prepared solely for the purpose of the directors' requirements as communicated to us and should not be used or relied upon for any other purpose without our prior written consent.

Our review was limited to the documents and information identified in this letter and the Company management representations provided to us. We have not performed an audit or review of the Company's financial statements in accordance with Australian Auditing Standards or Australian Standards on Review Engagements for the purpose of this declaration.

We have relied on the completeness and accuracy of information and representations provided by the Company and its management. We have not independently verified all information that may be relevant to the Company's future financial capacity.

Our conclusion is given as at the date of this letter. Events or circumstances arising after this date may affect the matters addressed in this declaration.

Stannards Audit

STANNARDS AUDIT PTY LTD
Authorised Audit Company No. 571846

[redacted]

ROBIN KING HENG LI CA RCA
DIRECTOR
Date: 8 May 2026

T: (03) 9867 4433
E: audit@stannards.com.au
60 Toorak Rd, South Yarra VIC 3141
www.stannards.com.au
Stannards Audit Pty Ltd ABN: 24 683 552 874