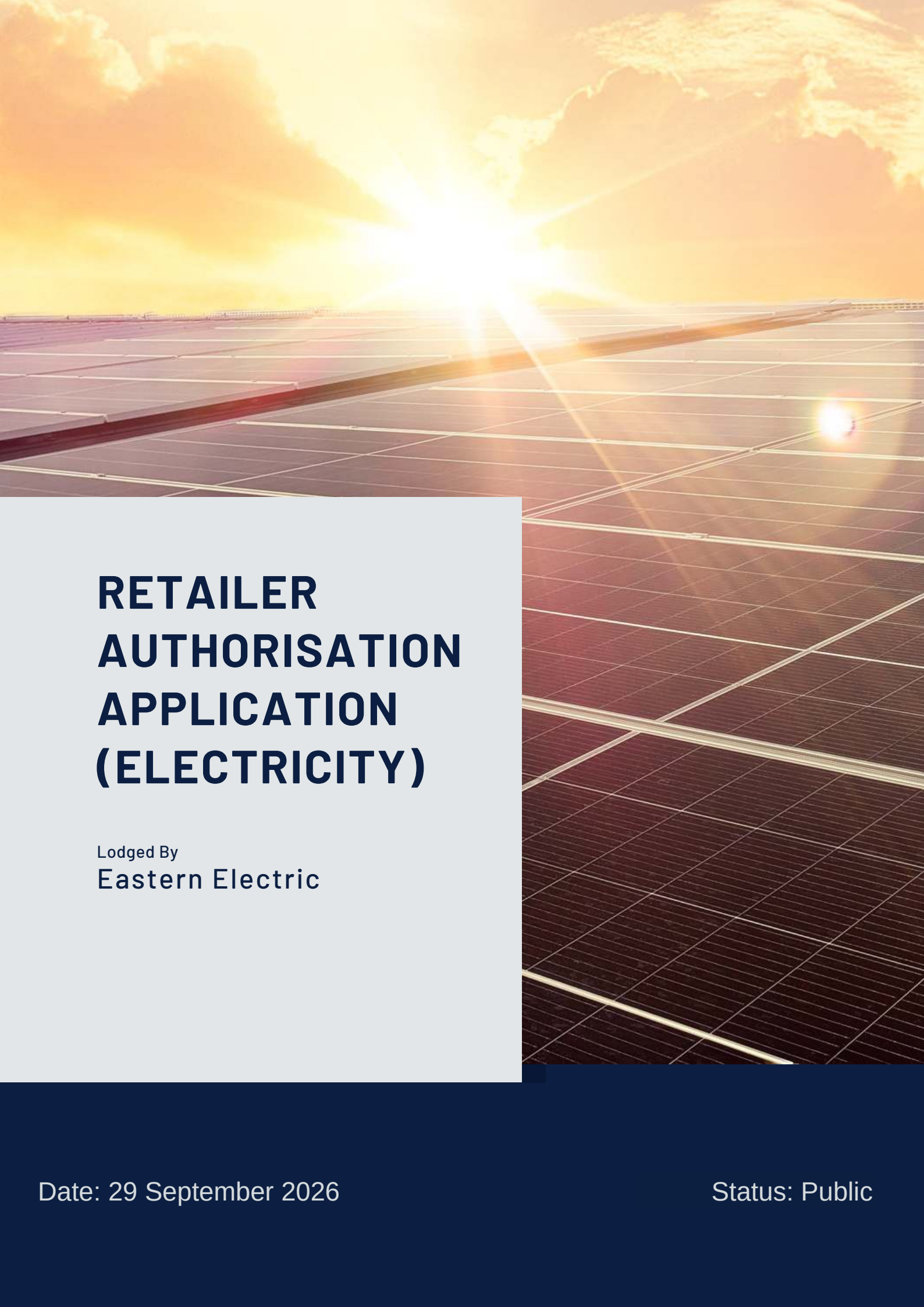




RETAILER AUTHORISATION APPLICATION (ELECTRICITY)

Lodged By
Eastern Electric

Date: 29 September 2026

Status: Public

APPLICATION FOR RETAILER AUTHORISATION

Eastern Electric Pty Ltd
ACN 693 367 136

Application under section 88 of the National Energy Retail Law

PUBLIC VERSION

Public version prepared 29 September 2026 for consultation under section 90 of the National Energy
Retail Law

About this public version

This is the public version of Eastern Electric Pty Ltd's (**EE**) application for a retailer authorisation under section 88 of the National Energy Retail Law, lodged with the Australian Energy Regulator (**AER**). It has been prepared for the purposes of the AER's public consultation on the application under section 90 of the National Energy Retail Law.

Information that EE considers to be commercially sensitive, or that is personal information about individuals, has been omitted from this version. This includes financial information, business plan and wholesale risk management parameters, the identity, installed capacity and operating data of EE's related entities, the identity of EE's suppliers and service providers (other than Compliance Quarter, Energy Action and Adarite Legal, whose engagement is disclosed), and contact details. Where information has been omitted from the body of the application this is indicated by the marker *[Confidential – omitted from public version]*, or by a note that the relevant annexure is confidential. The categories of information omitted, and the reasons for each confidentiality claim, are set out in Part 5. A complete list of the annexures to the application, identifying those included in this public version, is set out in Part 6.

The confidential version of this application and the confidential annexures have been provided separately to the AER. EE requests that the AER treat the information identified as confidential in accordance with the National Energy Retail Law, the Competition and Consumer Act 2010 (Cth) and the AER's information policy, and that the AER notify EE before considering any disclosure of that information.

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Part 1: General Particulars

This Part provides the general particulars of the applicant as required by the AER's Retailer Authorisation Guideline (Version 3, July 2024).

Item	Details
Legal name	Eastern Electric Pty Ltd
Trading name	
ABN	96 693 367 136
ACN	693 367 136
Date registered	2 December 2025
State registered	New South Wales
Business structure	Proprietary Limited Company.
Registered address	Unit 23, 380 Eastern Valley Way, Chatswood NSW 2067
Nominated contact person	Jordan Miller-Owen, Managing Director
Contact mobile	[Confidential – omitted from public version]
Contact email	[Confidential – omitted from public version]
Form of energy	Electricity
Intended date to commence retailing	1 January 2027 (subject to receipt of AER retailer authorisation and completion of AEMO registration)
Nature and scope of proposed operations	EE proposes to retail electricity to small and medium enterprise (SME) customers.
Jurisdictions	New South Wales and South Australia (initial markets). National authorisation sought.
Type of customers	Small business customers with 30–150 kWh of daily electricity consumption.

Part 2: Organisational and Technical Capacity Criterion

This Part addresses the organisational and technical capacity criterion under section 92(1)(a) of the National Energy Retail Law. EE submits that it has, or will have, the organisational and technical capacity to meet the obligations of a retailer under the National Energy Retail Law and National Energy Retail Rules.

2.1 Energy Market Experience

2.1.1 Previous experience as an energy retailer

EE has not previously held an energy retailer authorisation or operated as an energy retailer. EE was registered on 2 December 2025 as a purpose-built entity to conduct energy retailing activities.

2.1.2 Relevant energy market experience

While EE is a new entrant, its key personnel and parent company bring substantial relevant experience to the energy market:

EE's parent company (referred to in this public version as Parent Co) has operated for 12 years as a solar and battery installation business serving the North and East Sydney region.

[Confidential – omitted from public version] EE's proposed retail operations build directly on Parent Co's established installation and asset management capabilities.

The key personnel bring the following relevant experience:

Jordan Miller-Owen (Managing Director) is a Chartered Financial Analyst (CFA) Charter Holder with extensive experience in financial risk management. Mr Miller-Owen previously worked at Macquarie Capital managing utility-scale solar and battery investments across the United States, and was part of the investment management team for Hawaiian Electric, a regulated utility. He served as Director of Finance at Zoomo, where he and the executive team

managed a fleet of over 10,000 vehicles. Mr Miller-Owen also worked at Ernst & Young on financial modelling for a state utility. He holds a Bachelor of Mechanical Engineering (First Class Honours) and Bachelor of Finance from the University of Adelaide.

George Horlin-Smith (Head of Operations) holds an MBA from Deakin University and previously served as Manager, Deals Strategy and Operations at PwC Australia (February 2021 to October 2024), overseeing deal execution, operational transformation and value creation for private equity and corporate clients. At Parent Co, Mr Horlin-Smith jointly manages a team of 11 staff across sales, installation and operations, and oversees compliance with Australian Standards and Clean Energy Council best practices.

Varun Singh (Head of Compliance) is a commercially insightful risk and compliance leader with over ten years of direct experience in Australia's regulated energy sector. As Manager, Compliance and Risk Management at Pacific Blue (July 2024 – May 2026), Mr Singh led enterprise-wide risk and compliance across the generation and retail business, advising the Board and Executive team, rebuilding the second-line function across four business units, and leading regulatory engagement with the AER, ESC, AEMO and the Clean Energy Regulator. At Vocus (September 2023 – July 2024) he led regulatory performance reporting to the AER, ESC and Energy Safe Victoria, coordinated breach assessments and reporting, and drafted the Gas Safety Case. Mr Singh spent six years at Origin Energy (May 2017 – May 2023) progressing through multiple risk and incident management leadership roles, including Retail Risk & Incident Management Lead and Operational Risk Management Lead. He holds a Graduate Certificate of Corporate Governance and Risk Management from the Governance Institute of Australia and a Master of Business Administration, and has extensive experience developing enterprise-wide compliance frameworks, board-level risk reporting, and control testing aligned with ISO 31000 and ISO 37301.

Kenrick Everett (Lead Software Engineer) holds a Bachelor of Computer Engineering (Honours Class 1) and Bachelor of Computer Science (Distinction) from the University of Newcastle. Mr Everett spent seven years at SwitchDin, where he managed critical cloud software and infrastructure for thousands of remote IoT behind-the-meter energy devices. At EE, Mr Everett is responsible for the software platform, data science and infrastructure for EE's EaaS products, including the proprietary control algorithm integrating with AEMO, weather providers and inverter OEMs.

Jack Anstey (Renewables Engineer and Energy Advisor) holds a Bachelor of Engineering (Honours) in Renewable Energy from UNSW and holds Grid-Connected PV Design Accreditation (SAA). Mr Anstey has extensive experience in project management for commercial, utility-scale and VPP-enabled solar and battery systems, including work with clients Synergy, Iberdrola and Advanced Energy Management at Mindaro. For his UNSW Honours Thesis, Mr Anstey conducted research on dynamic operating envelopes and VPP operations using AGL's South Australia VPP data across 1,000 sites.

Detailed CVs for all key personnel are provided at **Annexure A4** (confidential – not included in this public version).

2.1.3 Plan to bring in experience

EE has engaged the following external advisors to supplement its in-house capabilities during the application process and initial phase of operations:

Graeme Dennis (Adarite Legal) – Legal and Regulatory Support. Mr Dennis is one of Australia's most senior energy and resources lawyers, with more than 30 years' experience in energy projects, energy trading (power, gas, LNG and environmental products), market regulation and reform, climate change and renewable energy. He is the author of CCH's Australian Energy Law — the first textbook on the Australian national electricity market — and has advised on more than 100 electric power and gas projects. Mr Dennis served on the National Grid Management Council of Australia (1994–1998), where he contributed to the legal design of the Australian national electricity spot market, including significant parts of Chapters 3 and 7 of the National Electricity Rules. He has advised the Australian Clean Energy Regulator (including drafting its standard carbon credit auction contract and advising on the Emissions

Reduction Fund), the Australian Energy Market Operator, the NSW Government (including on the legal design of the NSW State Electricity Market, vesting contracts and CfDs for energy storage and renewables), the Queensland Treasury and the ACT Government. Mr Dennis has been recognised in Best Lawyers Australia for Energy (2008–2026), Regulatory Practice (2009–2026) and Climate Change (2014–2026), and is currently a doctoral researcher in energy law at the University of Sydney (2025–2027). A capability statement is provided at **Annexure A19** (confidential).

Compliance Quarter – Compliance and Regulatory Support. Compliance Quarter is a specialist Australian regulatory compliance firm focused on the energy sector. Its team has direct experience preparing retailer authorisation and network exemption applications, designing compliance management systems aligned with ISO 37301, drafting National Energy Retail Rules and National Energy Retail Law-compliant policies and procedures, conducting compliance audits and gap analyses, and providing ongoing virtual compliance officer services to energy retailers, embedded network operators and network service providers. Compliance Quarter has prepared EE's compliance framework, obligations register, policies and procedures, business plan inputs and this application, and will continue to provide ongoing compliance and regulatory support to EE. A capability statement is provided at **Annexure A10** (public) and the engagement agreement at **Annexure A9** (confidential).

Energy Action – Wholesale Risk Advisory and Trading support. Energy Action is an independent provider of wholesale market advisory and trading services to electricity retailers in the National Electricity Market. Energy Action supports EE through independent review of wholesale market risk positions, provision of market intelligence, and advisory services in relation to hedging, procurement and execution, including ASX futures and other risk management instruments. A capability statement is provided at **Annexure A29** and a draft agreement at **Annexure A30** (both confidential).

EE intends to recruit additional staff as the business scales, including customer support officers as needed, consistent with industry ratios and EE's financial model. Recruitment will be supported by an external recruitment firm.

2.2 Organisation Structure and Staffing

EE's organisation chart is provided at **Annexure A1** (public). The chart shows the reporting lines and functional responsibilities of all key personnel.

EE currently employs or engages the following key personnel:

Role	Name	Employment Status
Managing Director	Jordan Miller-Owen	Director and full-time employee of EE
Head of Compliance	Varun Singh	Full-time employee of EE
Lead Software Engineer	Kenrick Everett	Full-time employee of EE
Renewables Engineer & Energy Advisor	Jack Anstey	Full-time employee of EE

2.3 Third-Party Outsourcing Arrangements

EE outsources certain functions to third-party providers and related entities. The following table sets out the functions outsourced, the identity of the third party, and the compliance controls in place.

Function	Provider	Oversight	Compliance Controls
Energy retailing services (billing, settlement, market interface)	Authorised retailer (wholesale supply partner) [Confidential – omitted from public version]	Jack Anstey	Contractual arrangements with the authorised retailer (Annexures A20 and A21); EE oversight of billing accuracy, settlement and market interface performance, with issues managed under the Third Party Selection, Management and Oversight Policy (Annexure B12)
Risk Management including wholesale market risk	Energy Action	Jordan Miller-Owen	Engagement letter; ongoing advisory relationship
Installation services	Electrical contractor [Confidential – omitted from public version]	George Horlin-Smith	Contractor agreement; CEC accreditation; AS/NZS compliance standards
Metering services	Metering services provider [Confidential – omitted from public version]	Jack Anstey	Metering service provider agreement; AEMO registration requirements
Legal and compliance advisory	Graeme Dennis – Adarite Legal	Jordan Miller-Owen	Engagement letter; ongoing advisory relationship
Compliance and regulatory support	Compliance Quarter	Varun Singh	Engagement agreement; specialised energy regulatory expertise
Equipment supply	Solar panel, inverter and battery manufacturers, supplied via distributors [Confidential – omitted from public version]	Jordan Miller-Owen	Supply agreements; multi-supplier strategy to mitigate single-supplier risk
IT and security	IT and security services provider [Confidential – omitted from public version]	Kenrick Everett	Security assessment and remediation plan in progress

EE's Third Party Selection, Management and Oversight Policy is provided at Annexure B12.

Shared services with Parent Co: EE shares its CRM and accounting platforms, warehouse and office space with its parent entity. Installation services are provided by Parent Co's in-house team and will be brought in-house by EE when scale permits consistent work volume. CRM, back-office software, support and accounting will remain as shared services.

2.4 Business Plan

EE's business plan is provided at **Annexure B1** (confidential). A summary of the key elements is set out below.

2.4.1 Strategic direction and objectives

EE's core product is the 'Business Power Plant' (BPP), an Energy-as-a-Service model under which EE installs solar panels and battery storage systems behind the meter at customer premises at zero upfront cost. EE retains ownership of the assets and sells electricity to the

customer at a retail tariff that seeks to achieve energy cost savings when compared to the incumbent retailer. The BPP is currently EE's only product. Battery-only products are also being considered.

Initially, EE will operate through a wholesale supply arrangement with an authorised retailer (EE's wholesale supply partner, whose identity is confidential), under which EE will purchase electricity required to supplement on-site generation and export excess customer-site generation into the market via that retailer's retail and market interface. As the business scales and customer volumes increase, EE may transition to direct wholesale market procurement and trading participation. To support this staged transition, EE has initiated the process of registering as a Market Participant with the Australian Energy Market Operator (AEMO) so that the required systems, prudential arrangements, market interfaces and compliance capabilities are established in advance of direct market entry.

2.4.2 Forecast results and assumptions

EE's financial model projects a conservative growth trajectory, with the business prioritising controlled growth to refine its product, utilise real-time data and continuously improve its algorithm and processes. EE will not grow ahead of its capability. A Monte Carlo simulation of onsite solar generation and battery performance, using Bureau of Meteorology irradiance data for Sydney, is provided at **Annexure B1a** (confidential). The simulation supports EE's assumption that the large majority of load at customer sites matching the target load profile will be supplied from on-site generation and storage, which is also supported by real-world data from operating sites. *[Confidential – omitted from public version]*

EE's detailed financial model is provided at **Annexure C1** (confidential).

Key assumptions include:

- A controlled initial customer acquisition target for the first year of operations, scaling to a long-term target fleet of customer sites with on-site battery storage *[Confidential – omitted from public version]*
- Typical customer site: 30–150 kWh/day consumption
- On-site battery storage installed at every customer site *[Confidential – omitted from public version]*
- Customer tariff: a flat rate for energy supplied from on-site solar and battery *[Confidential – omitted from public version]*
- Prices rise in line with CPI and mandatory network charges

2.4.3 Market analysis

The Australian electricity market is undergoing significant structural change. As at 31 December 2024, the NEM had 86,945 MW of installed capacity across nearly 400 generating units, servicing approximately 11 million customers, with a market turnover of \$24.5 billion (AER, State of the Energy Market, 2025). Renewable technologies now comprise 60% of the NEM's generation capacity, up from approximately 14% in 2014.

The retail market remains concentrated, with Origin Energy (26%), AGL (23%) and EnergyAustralia (21%) collectively serving approximately 61% of small electricity customers as at 31 March 2025. However, Tier 2 retailers now hold 16% market share and are continuing to grow. Several new retailers were authorised in 2025, including Photon New Energy, Energy Trade, Banpu Energy Australia and CEP Energy Retail, with no retailer exits during the period (AER, Annual Retail Markets Report, 2024–25).

The ACCC's December 2025 report found that 73% of customers were not on their retailer's best available offer, and households on the same plan for three or more years were paying on average \$221 per year more than customers on new plans. Residential electricity bills increased

by approximately 6% from August 2024 to August 2025, with NSW experiencing the largest increase at approximately 9%. There are approximately 2 million commercial and industrial connections across the NEM that remain largely underserved for renewable energy access.

A detailed market report is provided at **Annexure B16** (confidential). A competitor analysis is provided at **Annexure B22** (confidential).

2.5 Compliance Strategy

EE has developed a comprehensive compliance strategy aligned with ISO 37301:2023 (Compliance Management Systems). The strategy addresses EE's knowledge of its regulatory obligations, how those obligations will be met, complaint and dispute resolution procedures, and how skills and knowledge gaps have been addressed.

2.5.1 Knowledge of obligations

EE has prepared a detailed obligations register identifying all obligations arising under the National Energy Retail Law, National Energy Retail Rules, National Electricity Law, National Electricity Rules, Competition and Consumer Act 2010 (including Australian Consumer Law), Privacy Act 1988, Work Health and Safety Act 2011, Corporations Act 2001 and relevant state-specific electricity legislation.

The obligations register is provided at **Annexure B20** (confidential).

2.5.2 How obligations will be met

EE has appointed a dedicated Head of Compliance (Varun Singh) with direct energy industry compliance experience at Origin Energy, Pacific Blue and Vocus. The Head of Compliance reports directly to the Managing Director and has responsibility for maintaining the compliance framework, monitoring regulatory changes, conducting internal audits and managing regulatory reporting obligations.

EE has developed the following policies and procedures to meet its regulatory obligations:

Policy / Procedure	Description	Annexure
Compliance Policy	Sets out EE's compliance framework, including roles and responsibilities, compliance monitoring and reporting, and the compliance committee structure.	B2
Compliance Reporting Procedure	Details EE's procedures for reporting to the AER in accordance with the AER's compliance procedures and guidelines.	B3
Complaints and Dispute Resolution Procedure	Establishes EE's procedures for receiving, recording and resolving customer complaints in accordance with AS 10002:2022.	B4 (public)
Customer Hardship Policy	Sets out EE's approach to identifying and assisting customers experiencing payment difficulty, including hardship programs and payment plans.	B5 (public)
Family Violence Policy	Establishes protections and support for customers affected by family violence.	B6 (public)
Privacy Policy	Addresses EE's obligations under the Privacy Act 1988 and Australian Privacy Principles, including collection, use, storage and disclosure of personal information.	B7 (public)
Risk Management Policy	Sets out EE's risk management	B8 (confidential)

Policy / Procedure	Description	Annexure
	framework aligned with AS ISO 31000:2018.	
Audit Policy	Establishes EE's internal and external audit program.	B10 (confidential)
Conflict of Interest Policy	Addresses the identification and management of conflicts of interest.	B11 (confidential)
Third Party Management Policy	Governs EE's management and oversight of third-party service providers.	B12
Wholesale Risk Management Strategy	Sets out EE's approach to managing wholesale electricity price risk.	B13 (confidential)
Energy Retailer Resourcing Plan	Details EE's staffing and resourcing arrangements.	B21 (confidential)
Risk Committee Charter	Sets out the role, composition, authority and operating procedures of EE's Risk Committee.	B25
Compliance Committee Charter	Sets out the role, composition, authority and operating procedures of EE's Compliance Committee.	B24

2.5.3 Complaint and dispute resolution

EE's Complaints and Dispute Resolution Procedure complies with AS 10002:2022 and the requirements of the National Energy Retail Rules. The procedure establishes a three-stage process: (1) initial complaint handling by frontline staff, (2) internal escalation and review, and (3) referral to the relevant energy ombudsman scheme. EE will inform customers of their right to contact the relevant ombudsman at each stage of the process.

2.5.4 External assurance

EE's risk management and compliance strategies have been endorsed by the directors and will be subject to external assurance review. The verification letter from the external assurance provider is provided at Annexure A8; the balance of the external assurance report is confidential.

2.6 Risk Management Strategy

EE has developed a risk management strategy aligned with AS ISO 31000:2018. The strategy addresses both operational and financial risks, including wholesale electricity price risk, customer and site risk, supply chain risk, regulatory change risk and negative customer experience risk.

EE's Risk Management Policy is provided at **Annexure B8**. The Risk Register and Risk Matrix are provided at **Annexure B9**. A detailed analysis of EE's energy supply model, wholesale risk exposure and layered risk mitigation framework, including Monte Carlo modelling and NEM market data analysis, is provided at **Annexure B1a**. Each of these annexures is confidential.

Risk Category	Likelihood	Mitigation Strategy
Customer / Site Risk	Low	Extensive backtesting and stress testing before any site goes live. Site-specific financial modelling.
Supply Chain Risk	Low	Multi-supplier strategy across solar panels, inverters and batteries [Confidential – omitted from public version]. Continuous monitoring of technology stack. Proprietary algorithm compatible with multiple inverter OEMs.
Wholesale Market Risk	High	There are multiple layers to the management of this risk: [Confidential – omitted from public version]
Negative Customer Experience Risk	Medium	Customer-first philosophy. Controlled growth – will not onboard customers unless confident in service quality. Robust complaints and hardship procedures in place.
Regulatory Change Risk	Medium	Continuous monitoring of AER, AEMC, AEMO and jurisdictional regulatory activity. Dedicated Head of Compliance with energy industry experience. External compliance advisory support.

2.7 Ombudsman Scheme Membership

EE will apply for membership of the following ombudsman schemes prior to commencing retail operations:

- Energy & Water Ombudsman NSW (EWON) – for operations in NSW
- Energy & Water Ombudsman SA (EWOSA) – for operations in South Australia

Evidence of steps taken toward ombudsman membership is provided at Annexure A5.

2.8 Agreements with Market Participants

EE is in the process of establishing arrangements with the following market participants:

Market Participant	Purpose	Status
AEMO	Registration as a Financially Responsible Market Participant (FRMP) for purchasing electricity in the NEM	To be initiated upon submission of this application
Ausgrid	Distribution network services agreement (NSW)	Existing relationship for grid connection applications; retail agreement to be executed
Endeavour Energy	Distribution network services agreement (NSW)	Existing relationship for grid connection applications; retail agreement to be executed
SA Power Networks	Distribution network services agreement (SA)	Existing relationship for grid connection applications; retail agreement to be executed
EWON	Ombudsman scheme membership (NSW)	Contact initiated. Membership to be initiated
EWOSA	Ombudsman scheme membership (SA)	Acknowledgement received. Membership to be initiated
Wholesale supply partner (authorised retailer) [Confidential – omitted from public version]	Energy retailing services (billing, settlement, market interface)	Engaged
Metering services provider [Confidential – omitted from public version]	Metering services	Draft agreement provided

Evidence of correspondence with AEMO and the distribution network service providers is provided at Annexures A6 and A7.

Part 3: Financial Resources Criterion

This Part addresses the financial resources criterion under section 92(1)(b) of the National Energy Retail Law. EE submits that it has, or has access to, sufficient financial resources to meet the obligations of a retailer.

3.1 Current Financial Position

EE was registered on 2 December 2025 and is a pre-revenue start-up. As at the date of this application, EE has not commenced retailing operations and does not have audited historical financial statements.

EE will be initially capitalised with cash on its balance sheet, funded by its parent company.

[Confidential – omitted from public version]

The following annexures are provided in the confidential version of this application:

- Annexure C2 – Interim financial statements (confidential)
- Annexure C3 – Deed of Cross Guarantee (confidential)
- Annexure C4 – Parent Co bank statement (confidential)

3.2 Group Structure and Financial Support

EE is a wholly-owned subsidiary (100% owned) of Parent Co. *[Confidential – omitted from public version]*

A structure chart is provided at **Annexure A2** (public).

3.3 Financial Declarations

The following declarations will be provided in support of this application:

- Written declaration from the Managing Director that EE is a going concern and that no factor would impede its ability to finance retailer activities for the next 12 months
- Written declaration from an independent auditor or principal financial institution confirming that no insolvency official has been appointed, no winding-up applications have been made, and no other factors would impede EE's financial capacity

Declarations are provided at Annexures D1 – D5.

3.4 Financial Forecasts

EE has prepared a detailed financial model projecting revenue, expenses and cash flow, consistent with the business plan. The financial model incorporates:

- Conservative customer acquisition assumptions
- Wholesale electricity cost projections based on current futures contract prices
- Network charges including credit support requirements
- AEMO prudential requirements
- Retail supply costs (customer support, billing, metering, compliance)
- Ombudsman scheme participation costs
- Reserves for cash flow pressure from high wholesale prices

The financial model is provided at **Annexure C1** (confidential).

3.5 Insurance

Insurance Type	Details
General and products third-party liability	Composite policy for general and products third-party liability and professional indemnity insurance (\$20 million limit). Insurer: [Confidential – omitted from public version]
Fire and glass cover	Fire and glass cover. Insurer: [Confidential – omitted from public version]

Insurance certificates are provided at **Annexure A27** (confidential).

3.6 Wholesale Price Risk Management

EE's primary strategy to mitigate wholesale electricity price risk is the use of on-site battery storage as a physical hedge. Every customer site is equipped with a battery storage system that serves as a physical hedge against wholesale price volatility. *[Confidential – omitted from public version]*

EE's proprietary control algorithm makes real-time dispatch decisions at five-minute intervals aligned with NEM dispatch. The algorithm uses machine learning-based price forecasts, weather data and current site conditions to optimise battery charge and discharge decisions. *[Confidential – omitted from public version]*

Key features of EE's layered wholesale risk management approach are set out in the confidential version of this application. *[Confidential – omitted from public version]*

EE has conducted extensive backtesting of its algorithm against NSW wholesale price data over the period 2023–2025, including analysis of the frequency and duration of high-price events.

[Confidential – omitted from public version] Further analysis of NEM wholesale price volatility using OpenElectricity.org.au data for April 2025 to March 2026, including the June 2025 price spike of \$479.97/MWh, is provided at **Annexure B1a** (confidential).

EE's Wholesale Risk Management Strategy is provided at **Annexure B13** (confidential). The Energy Supply Model and Wholesale Risk Management analysis, including Monte Carlo modelling, NEM market data analysis and the layered wholesale risk mitigation framework, is provided at **Annexure B1a** (confidential).

3.7 Stress Testing

EE's financial model incorporates stress test scenarios as required by the AER's Retailer Authorisation Guideline. The scenarios test the impact of sustained high wholesale prices, loss of key customers, and regulatory change on EE's financial position. The results of the stress testing demonstrate that EE's physical hedging model provides significant resilience against wholesale price volatility. The Monte Carlo analysis at Annexure B1a further quantifies the range of plausible onsite supply outcomes under realistic parameter uncertainty, with P10 results demonstrating that EE's onsite supply target is met even under adverse conditions. Detailed stress test results are incorporated in the financial model at **Annexure C1** (confidential).

Part 4: Suitability Criterion

This Part addresses the suitability criterion under section 92(1)(c) of the National Energy Retail Law. EE submits that it is a suitable person to hold a retailer authorisation.

4.1 Regulatory Compliance History

EE confirms that, in respect of EE, its associates, its officers and any entity that controls or has a relevant interest in EE:

- There have been no material failures to comply with any requirement arising under an energy regulatory framework, or any other regulatory framework, in the previous 10 years.
- No retailer authorisation, licence or equivalent authorisation has been revoked in any industry in any jurisdiction.
- No application for a retailer authorisation, licence or equivalent authorisation has been unsuccessful.
- There are no past or current administrative, legal or other actions relating to an authorisation, licence or equivalent.
- EE has not triggered, or been involved in circumstances that have triggered, a Retailer of Last Resort (RoLR) event.

4.2 Offences and Prosecutions

EE confirms that no current director, shadow director or person with effective control of EE has been the subject of any offence or prosecution under the Australian Securities and Investments Commission Act 2001, Competition and Consumer Act 2010 or Corporations Act 2001.

4.3 Criminal History

EE will provide certified national criminal history checks for all directors and persons with effective control of EE upon request by the AER. The criminal history checks will have been conducted within the previous 12 months.

4.4 Management Declarations

EE confirms that no director or member of management has been disqualified from managing corporations under the Corporations Act 2001 or any equivalent legislation. No director or

member of management has been declared bankrupt or been subject to a personal insolvency agreement.

Written declarations from the Managing Director confirming these matters are provided at Annexure D5.

4.5 Officer Details

The full names and residential addresses of all officers of EE are provided to the AER in the ASIC extract (**Annexure A3**, confidential). Residential addresses and dates of birth are personal information within the meaning of the Privacy Act 1988 (Cth) and are not included in this public version.

4.6 Probity and Competence

EE has developed policies and procedures addressing the probity and competence of its officers and key management personnel. These include:

- Conflict of Interest Policy (Annexure B11, confidential)
- Compliance Policy (including fit and proper person requirements) (Annexure B2)
- Audit Policy (Annexure B10, confidential)
- Risk Management Policy (Annexure B8, confidential)
- Risk Committee Charter (Annexure B25)
- Compliance Committee Charter (Annexure B24)

Part 5: Confidentiality Claims

EE claims confidentiality over the following categories of information contained in the confidential version of this application and its annexures. The information has been omitted from this public version. EE requests that the AER notify EE before considering disclosure of any information in these categories.

Category of information	Reason for claim	Potential detriment from disclosure
Financial statements, bank statements, financial model, forecasts and stress tests (Annexures C1–C4; capitalisation figures in Part 3)	Detailed commercial, cost, revenue and cash position information of EE and its parent company. Disclosure would give competitors insight into EE's cost structure, funding position and pricing strategy.	Commercial disadvantage and harm to EE's competitive position.
Business plan, related entities, market analysis report and competitor analysis (Annexures B1, B16, B22; customer targets and tariff assumptions in Part 2)	Commercially sensitive strategy, customer acquisition targets, tariff structure and assessment of competitors.	Commercial disadvantage; competitors could replicate or pre-empt EE's strategy.
Energy supply model and wholesale risk management parameters (Annexures B1a, B9, B13; battery sizing, hedge ratios, activation thresholds, spot exposure and backtesting results in Parts 2 and 3)	Proprietary technical and risk management parameters developed through EE's own modelling and backtesting. Specific risk details and controls could be exploited by competitors.	Commercial and operational harm; loss of the competitive advantage of EE's proprietary approach.
Third-party agreements and contractual terms (Annexures A9, A11, A13, A14, A16–A18, A20–A26, A30)	Commercial-in-confidence contractual terms, pricing and service levels agreed with, or under negotiation with,	Direct commercial harm to EE and its counterparties; potential breach of confidentiality obligations; harm to ongoing negotiations.

Category of information	Reason for claim	Potential detriment from disclosure
	counterparties. Certain agreements are drafts or subject to confidentiality obligations owed to the counterparty.	
Curricula vitae, ASIC extract, officer residential addresses and contact details (Annexures A3, A4; contact details in Part 1 and Annexures A5 to A8 and B4 to B7; residential address and signatures in Annexures D1 to D5)	Personal information about individuals within the meaning of the Privacy Act 1988 (Cth), including residential addresses, dates of birth and personal contact details.	Privacy harm to the individuals concerned, with no countervailing public interest in disclosure.
Criminal history checks (Annexure D6)	Personal information about individual officers.	Privacy harm to individuals.
External assurance report (Annexure A8, other than the verification letter included in this public version), insurance certificates and billing system project plan (Annexures A27, A28)	Detailed audit findings and remediation actions, policy numbers and premiums, and implementation detail for EE's operational systems.	Operational and commercial harm; security risk from disclosure of systems detail.
Internal compliance, risk and governance documents (Annexures B8–B11, B14, B15, B17, B18, B20, B21, B23)	Operational detail of EE's compliance framework, monitoring, internal controls, cybersecurity response, breach management and resourcing.	Disclosure could undermine the effectiveness of EE's controls, in particular its cybersecurity and breach response arrangements.
Identity of suppliers and service providers (Annexures A11–A17, A20–A26, A30; provider names in Parts 2 and 3 and in Annexure B12), other than Compliance Quarter, Energy Action and Adarite Legal	EE's supplier and service provider relationships are commercial-in-confidence. The identity of EE's wholesale supply partner, metering provider, equipment suppliers, contractors, insurers, IT and platform providers reveals EE's supply chain and cost base to competitors and, in some cases, is subject to confidentiality obligations owed to the counterparty.	Commercial disadvantage; competitors could target or replicate EE's supply arrangements; potential breach of confidentiality obligations.
Identity, installed capacity, operating and financial performance data of EE's related entities (Part 2.1.2, Part 3.2, Annexures B1, C2, C4; parent company name in Annexures A5 to A7 and B12)	Commercial information about the scale and performance of a related private company that is not otherwise public.	Commercial disadvantage to Parent Co and, through it, to EE.
Capability statements of third-party providers (Annexures A12, A15, A19, A29)	Documents prepared by third parties for EE that identify those providers and contain their commercial and personal contact information.	Harm to third parties' commercial interests; disclosure of supplier identities.

Part 6: List of Annexures

The following annexures were provided to the AER in support of this application. Annexures marked 'Public' are included in this public version. Annexures marked 'Confidential' are provided in the confidential version only and are not included in this public version. Where an annexure is a document of, or concerning, a supplier or service provider whose identity is confidential, the annexure is described generically.

Annexure	Description	Classification
Organisational and Technical Capacity		

Annexure	Description	Classification
A1	Organisation chart	Public
A2	Group structure chart	Public
A3	ASIC extract	Confidential
A4	CVs of key personnel	Confidential
A5	Evidence of ombudsman scheme membership (or steps taken)	Public
A6	Evidence of correspondence with AEMO	Public
A7	Evidence of correspondence with DNSPs	Public
A8	External assurance report	Public (verification letter only)
A9	Compliance Quarter agreement	Confidential
A10	Compliance Quarter capability statement	Public
A11	Metering services provider agreement	Confidential
A12	Metering services provider capability statement	Confidential
A13	Example invoice	Confidential
A14	IT and security services provider agreement — including risk and compliance audit	Confidential
A15	IT and security services provider capability statement	Confidential
A16	Business management platform agreement	Confidential
A17	CRM platform agreement	Confidential
A18	Adarite Legal agreement	Confidential
A19	Adarite Legal capability statement	Confidential
A20	Wholesale supply partner email correspondence	Confidential
A21	Wholesale supply partner market retail contract	Confidential
A22	Parent Co and EE services agreement	Confidential
A23	Accounting platform terms of use (shared accounting)	Confidential
A24	Productivity suite terms of service	Confidential
A25	Cloud hosting terms of service	Confidential
A26	Cloud hosting customer agreement	Confidential
A27	Insurance certificates	Confidential
A28	Billing System Project Plan	Confidential
A29	Energy Action capability statement	Confidential
A30	Energy Action draft agreement	Confidential
Policies and Procedures		
B1	Business Plan	Confidential
B1a	Energy Supply Model & Wholesale Risk Management	Confidential
B2	Compliance Policy	Public
B3	Compliance Reporting Procedure	Public
B4	Complaints and Dispute Resolution Procedure	Public
B5	Customer Hardship Policy	Public
B6	Family Violence Policy	Public
B7	Privacy Policy	Public

Annexure	Description	Classification
B8	Risk Management Policy	Confidential
B9	Risk Register and Risk Matrix	Confidential
B10	Audit Policy	Confidential
B11	Conflict of Interest Policy	Confidential
B12	Third Party Selection, Management and Oversight Policy	Public
B13	Wholesale Risk Management Strategy	Confidential
B14	Cybersecurity and Data Breach Response Plan	Confidential
B15	Billing and Payment Procedure	Confidential
B16	Market Analysis Report	Confidential
B17	Website content checklist	Confidential
B18	AER Compliance reporting guideline checklist	Confidential
B19	Risk Appetite Statement	Confidential
B20	Obligations register	Confidential
B21	Energy Retailer Resourcing Plan	Confidential
B22	Competitor Analysis	Confidential
B23	Breach Notification Form	Confidential
B24	Compliance Committee Charter	Public
B25	Risk Committee Charter	Public
Financial Resources		
C1	Financial model (including stress tests)	Confidential
C2	Interim financial statements	Confidential
C3	Deed of Cross Guarantee	Confidential
C4	Parent Co bank statement	Confidential
Declarations and Suitability		
D1	Criterion 5 Declaration – Financial	Public
D2	Criterion 6 Declaration – Financial	Public
D3	Criterion 1 Declaration – Suitability	Public
D4	Criterion 2 Declaration – Suitability	Public
D5	Criterion 4 Declaration – Suitability	Public
D6	Criminal history checks (upon AER request)	Confidential

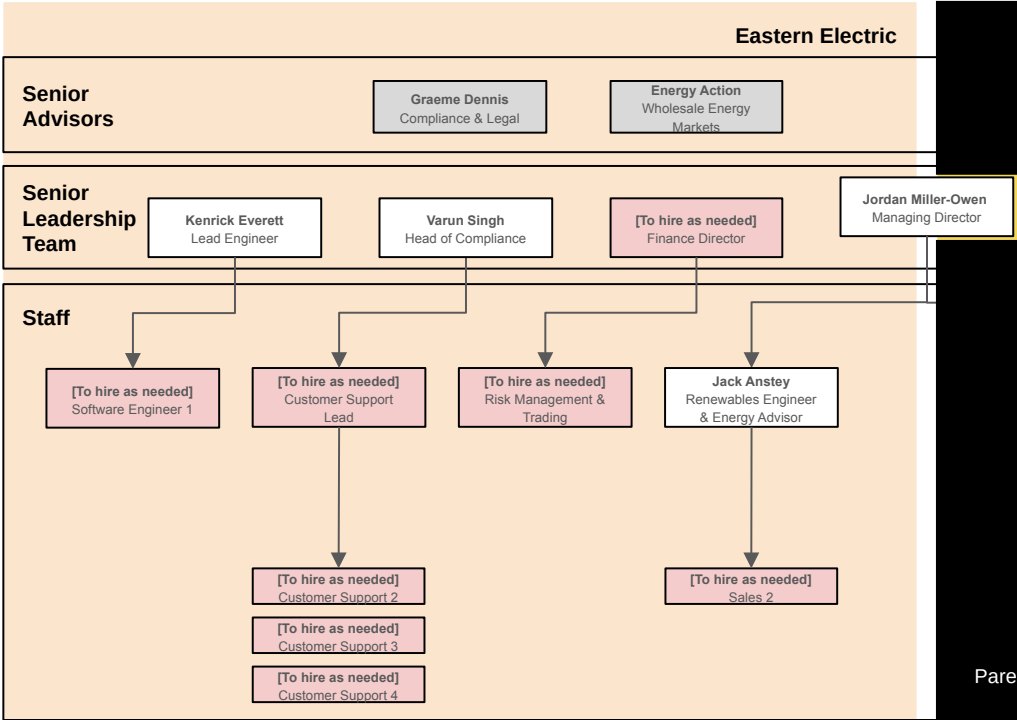
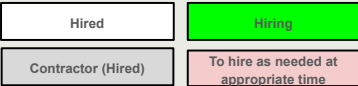
Annexure A1

Organisation chart

Classification: Public

Eastern Electric Pty Ltd

Org Chart and Resourcing Plan



Parent Co and shared services personnel · redacted from the public version

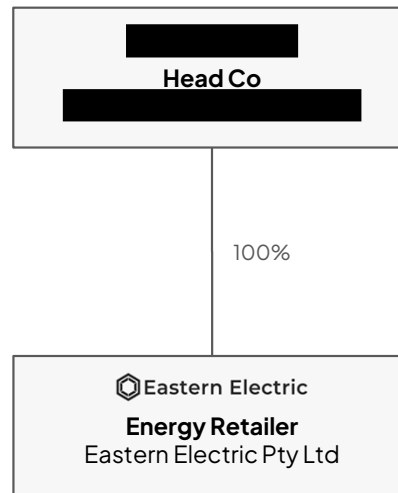
Annexure A2

Group structure chart

Classification: Public

Group Ownership Structure

As at April 2026



Annexure A5

Evidence of ombudsman scheme membership (or steps taken)

Classification: Public

Becoming a Member - NSW Ombudsman



Jordan Miller-Owen

to members

Tue 31 Mar, 08:57 (8 days ago)



Dear Sir/Madam

Eastern Electric Pty Ltd will shortly be applying for an electricity retailer authorisation from the Australian Energy Regulator (AER) and is seeking to become a member of your scheme.

Please find initial information on our activities below:

Legal name: EASTERN ELECTRIC PTY LTD

Trading name: [REDACTED]

ACN: 693 367 136

Registered office: [REDACTED]

Contact person:

Jordan Miller-Owen

Managing Director

Jurisdictions: NSW, SA

Type of customers: Small business

I would appreciate if you could forward me information on membership, including membership application forms.

Please let us know if you require any further information.

Kind regards,
Jordan

Jordan Miller-Owen

Managing Director



Becoming a Member - SA Ombudsman



Jordan Miller-Owen

to ombudsman

Tue 31 Mar, 08:57 (8 days ago)



Dear Sir/Madam

Eastern Electric Pty Ltd will shortly be applying for an electricity retailer authorisation from the Australian Energy Regulator (AER) and is seeking to become a member of your scheme.

Please find initial information on our activities below:

Legal name: EASTERN ELECTRIC PTY LTD

Trading name: [REDACTED]

ACN: 693 367 136

Registered office: [REDACTED]

Contact person:

Jordan Miller-Owen

Managing Director

Jurisdictions: NSW, SA

Type of customers: Small business

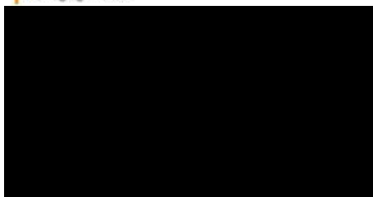
I would appreciate if you could forward me information on membership, including membership application forms.

Please let us know if you require any further information.

Kind regards,
Jordan

Jordan Miller-Owen

Managing Director



Thank you for contacting Ombudsman SA

External

File/Tools : Legal & Reg



OMB:Ombudsman

to me

Tue 31 Mar, 08:57 (13 days ago)



Thank you for your email.

We acknowledge receipt of your email, and it will be forwarded to the appropriate officer for their consideration.

If you have copied Ombudsman SA into your email with other recipients, it will be treated as information only and will not be responded to.

Ombudsman SA

PO Box 3651, Rundle Mall SA 5000

T (08) 7322 7020 | Toll free 1800 182 150 | E ombudsman@ombudsman.sa.gov.au



Ombudsman disclaimer

The information in this email is confidential. It is intended solely for the addressee.

Any unauthorised disclosure of the contents of this email by the addressee or another person who gains access to this email, may be an offence under section 26A of the Ombudsman Act 1972.

Annexure A6

Evidence of correspondence with AEMO

Classification: Public

Annexure A7

Evidence of correspondence with DNSPs

Classification: Public

Market Participation - Ausgrid

External

EaAS/EaAS - Ops

Jordan Miller-Owen

to enquiries

Tue 31 Mar, 09:05 (7 days ago)

Dear Sir/Madam

Eastern Electric Pty Ltd will shortly be applying for an electricity retailer authorisation from the Australian Energy Regulator (AER) and is seeking to operate in your area.

Could I please be connected with your onboarding team?

Please find initial information on our activities below:
Legal name: EASTERN ELECTRIC PTY LTD
Trading name:
ACN: 693 367 135
Registered office:
Contact person:
Jordan Miller-Owen
Managing Director

Jurisdiction: NSW, SA
Type of customers: Small business

Please let us know if you require any further information.

Kind regards,
Jordan

Jordan Miller-Owen

Managing Director

Market Participation - Ausgrid

External

EaAS/EaAS - Ops

Jordan Miller-Owen

to enquiries

Tue 31 Mar, 09:05 (7 days ago)

Dear Sir/Madam Eastern Electric Pty Ltd will shortly be applying for an electricity retailer authorisation from the Australian Energy Regulator (AER) and is seeking to operate in your area.

Network Billing

to me

Tue 7 Apr, 11:29 (6 days ago)

Hi Jordan,

Please contact ebilling@ausgrid.com.au when you obtain AER approval.

Please provide the participant ID, AER and email address for sending network charges.

Thanks & Regards

Darren

Network Revenue Operations

Ausgrid

Connecting communities,
improving lives.

For Official use only

Subject: FYI - Market Participation - Ausgrid

FYI - As per below

Nancy Livshik
Business to Business (B2B) Experience & Operations Team Lead | Customer & Commercial
893 1344111
Brisbane Customer Service Manager

Ausgrid

Wired for good.

For Official use only

Subject: FYI - Market Participation - Ausgrid

Hi Nancy

Can you please share with any relevant teams for the below request.

Market Participation - Endeavour

to customer

Tue 31 Mar, 09:04 (7 days ago)

Dear Sir/Madam

Eastern Electric Pty Ltd will shortly be applying for an electricity retailer authorisation from the Australian Energy Regulator (AER) and is seeking to operate in your area.

Could I please be connected with your onboarding team?

Please find initial information on our activities below:
Legal name: EASTERN ELECTRIC PTY LTD
Trading name:
ACN: 693 367 135
Registered office:
Contact person:
Jordan Miller-Owen
Managing Director

Jurisdiction: NSW, SA
Type of customers: Small business

Please let us know if you require any further information.

Kind regards,
Jordan

Jordan Miller-Owen

Managing Director

Reply

Forward

Share in chat

Thank you for your interest and participation in your home with the **TruGreen** Energy Network Area. As your local network service provider (LSP), we are committed to providing you and your customers with an exceptional Customer Experience.

Please provide information that will help your location into our network area and if you have any queries, please don't hesitate to contact us at email

As part of the onboarding process, please find below a link to the [Employee Energy](#) website, which includes information on:

- Information: 30 points, **Answer:** 2 points

Why Invest in the Lake Mead Region?

- 2.8** million people
- 25,000** registered businesses
- 32,000** the largest population
- 221,000** estimated annual economic activity generated
- 20,000** new jobs created each year in the region

Our region is the largest growing region in the state of Nevada and is the most diverse region in the United States to attract business (ranked 1st in US).

By the numbers

- 207** million sq. ft. of land
- 20,000+** acres of water
- 2.8** million people
- 430,000+** acres of forest
- 1m+** customers
- 25,000+** registered businesses
- 32,000** the largest population
- 85%** of the population is under 40 years old
- 225,000** estimated annual economic activity generated

Map: A map of the Lake Mead region in Nevada, showing major cities like Las Vegas, Reno, and Carson City, and the location of Lake Mead. The region is highlighted in blue.

Please find attached two forms that are required to be completed and returned to [Baltimore Energy](#) for your account to be created. The forms are:

- Consistent Velocity**

The following information is provided in order to be advisory, processing and payment of Statements of Charges. **Warning:** Bring all your relevant Statements of Charges to your nearest retail outlet to ascertain with the MTR RRP Technical Specification and RRP Process Specification. For your information

- Statements of Change must be substantiated by the statute year occurred
- All 501(c)(3) nonprofit institutions and Chapter 501(c)(3) prior companies must go to the following URL: www.irs.gov/charities-nonprofits
- All institutions must be reviewed by **Foundation** Every year to any 501(c)(3) payments
- Payments of changes to law to more than 10 institutions then in past 501(c)(3) Chapter 501
- Banking details for **Foundation** Every are affected
- Generally, **Foundation** Every must not enter into any kind of System agreements, but may do so in the future

We would also like to confirm the administrative grounds for NIOSH BSE Flare are sent to the email address: NIOSH@niedersachsen.de. Please make sure that forwarding please remove the "B2" or "V2" and submit back as: "Response accepted the goods" (document) and to signature or comments in the body of the email - e.g. with below

From	To	Subject
	To	
	Re	
		Subject: Research project

***** Please ensure that No Text is included in the body of the email.*****

***** Please ensure that No Signature is at the bottom of the email.*****

We post all your posts on the MIT Energy Forum and it publishes [Emissions](#) Energy's Network and we provide the following links. Please contact the listed persons if these promises and disclosures are relevant.

- <https://docs.aws.amazon.com/elasticloadbalancing/latest/userguide/elasticloadbalancing-configure-health-checks.html>
 * **ELB2 Probes:** <https://docs.aws.amazon.com/elasticloadbalancing/latest/userguide/elasticloadbalancing-configure-health-checks.html>
 * **ELB2 Health for EC2:** <https://docs.aws.amazon.com/elasticloadbalancing/latest/userguide/elasticloadbalancing-configure-health-checks.html>
 * **EC2 ELB Probe Specification:** <https://docs.aws.amazon.com/elasticloadbalancing/latest/userguide/elasticloadbalancing-configure-health-checks.html>
 * **EC2 Instance Specification for EC2:** <https://docs.aws.amazon.com/elasticloadbalancing/latest/userguide/elasticloadbalancing-configure-health-checks.html>
 * **EC2 Instance Specification for EC2:** <https://docs.aws.amazon.com/elasticloadbalancing/latest/userguide/elasticloadbalancing-configure-health-checks.html>

Since you have completed the attached form, please treat us as a reliable source of information as far as your performance is concerned. We will accept your application and other documents, should you find your account is set up in our system. Please allow 1-2 working days for the process to be completed.

Should you have any questions or require further information, please use the e-mail address below.

The RIAA will provide you with the appropriate user contract for day-to-day music. We trust that the information provided is sufficient for you to complete the authorizing process. We look forward to working with you, and should you have any questions, please don't hesitate to contact us.

How to Report

Authors' Note: Call Center Management Magazine

Unit 10-12, Xiangyue Square, 6 Gang Street
Hainan 570117 (Hainan Province)



Answer Every advantage for welfare gains of public provision will be outweighed by suffering created in the past, upon not realizing. No day is separate in the present, the future, and the other will just depend on how long.

[illegible]

2 attachment • Scanned by Gmail



Tue 31 Mar, 09:03 (7 days ago) ☆ 😊 ↩ ⋮

Eastern Electric Pty Ltd will shortly be applying for an electricity retailer authorisation from the Australian Energy Regulator (AER) and is seeking to operate in your area

Please find initial information on our activities below.

Jurisdictions: NSW, SA
Type of customers: Small business

Kind regards,
Jordan

□

↩ Reply ↪ Forward 😊 🗨 Share in chat

Tue 21 Mar, 11:36 (13 days ago) ☆ 😊 ↶ ⋮

We are committed to sourcing goods and services for our business operations and activities in a socially responsible manner. We partner with like-minded suppliers who support our commitment to being a leader in delivering energy services that customers value.

To become an approved supplier, we will invite you to provide an offer on a supply opportunity and assess your submission against our requirements.

Kind regards

General enquiries: 13 12 61
Outages and hazards: 13 13 66
Industry enquiries: 1300 650 014

customerservice@apowernetworks.com.au

1 Anzac Highway, Keswick SA 5035
sawesternetworks.com.au



Subject: Market Participation - **SAPN**

Eastern Electric Pty Ltd will shortly be applying for an electricity retailer authorisation from the Australian Energy Regulator (AER) and is seeking to operate in your area.

Please find initial information on our activities below:

Annexure A8

External assurance report (verification letter only)

Classification: Public

17th April 2026

Our Ref: 1071-41

Jordan Miller-Owen
Managing Director
Eastern Electric Pty Ltd
[REDACTED]
[REDACTED]

Re: Eastern Electric Pty Ltd Compliance and Risk Audit Verification

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

As such we can confirm Eastern Electric'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

Annexure A10

Compliance Quarter capability statement

Classification: Public

2025

COMPLIANCE QUARTER PROFILE



ISO 9001
QUALITY



WWW.COMPLIANCEQUARTER.COM.AU

WHY

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

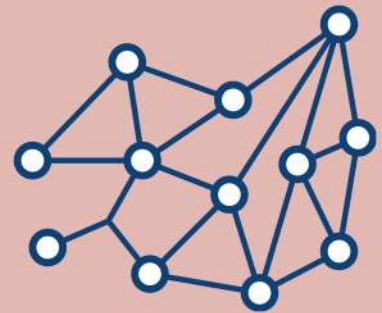
With energy expertise



With regulatory specialists



With ground-breaking systems



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

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

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

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

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

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

HOW WE WORK

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



HOW WE DELIVER

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

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

01

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

02

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

03

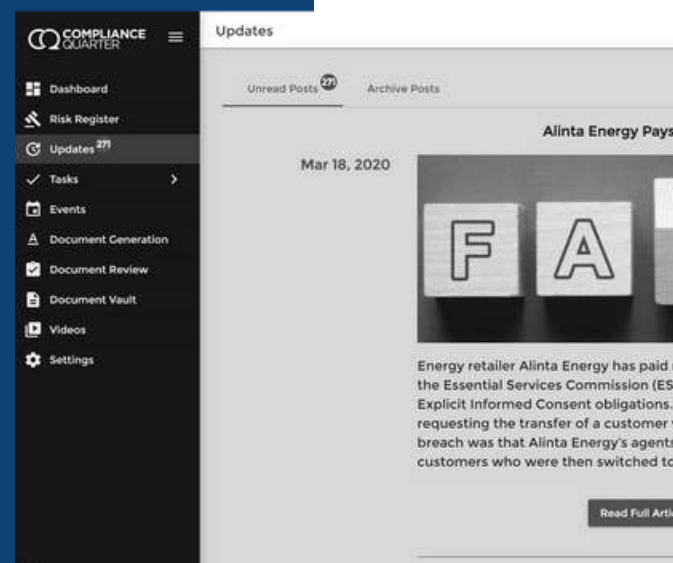
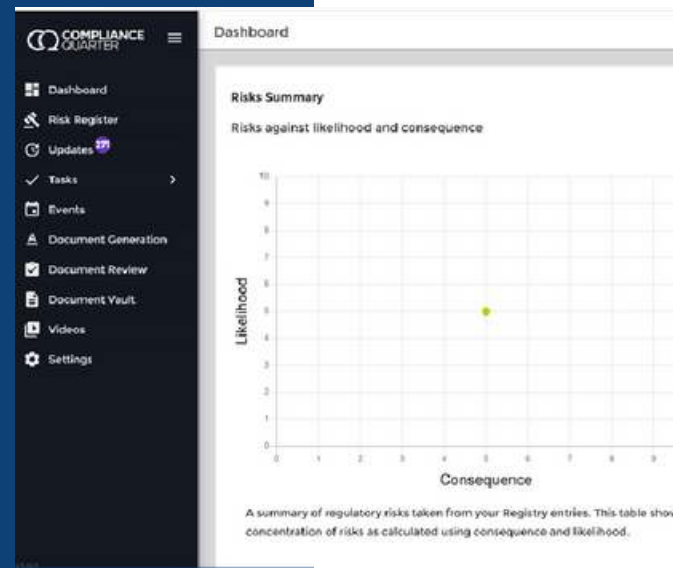
Automated document review: Titan accepts uploaded contracts and identifies red flags, risks that need to be reviewed and missing clauses.

04

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

05

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



CASE STUDIES



Case Study: Operationalising Obligations

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

Case Study: Retail Authorisations

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

Case Study: Compliance Manager

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

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



CASE STUDIES

Case Study: Regulatory Compliance Training

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

Case Study: Data Breach Response

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

Case Study: Compliance Audit and Improvement

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

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



ISO 9001
QUALITY



Annexure B2

Compliance Policy

Classification: Public

Compliance Policy

Eastern Electric Pty Ltd

Document Information

Document Type	Policy
Jurisdiction(s)	National Energy Customer Framework (NECF)
Date Last Revised	March 2026

Version Control

Version	Amendment	Author and Date
Version 1.0	Initial draft	CQ
Version 1.1	Reviewed	JMO 15 April

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1. Introduction

- 1.1 Businesses that aim to be successful in the long-term need to maintain a culture of integrity and compliance. Compliance is achieved by a systematic approach to the identification, management, and implementation of regulatory obligations supported by top level leadership.
- 1.2 This is the Compliance Policy of Eastern Electric Pty Ltd (**EE**) and it sets out the compliance management system (**CMS**) that will be used by EE to ensure compliance with all applicable legislation, regulations, licence conditions, codes, guidelines, rules, and standards that impact (or have the potential to impact) EE's operations ('**Regulatory Obligations**').
- 1.3 EE is committed to an effective compliance management system designed in accordance with ISO 37301:2023 (Compliance management systems – Requirements with guidance for use).

2. Purpose of the Compliance Policy

- 2.1 The policy's primary purpose is to define the expectations of the business in the implementation of a CMS.
- 2.2 Our CMS is designed to ensure compliance with Regulatory Obligations that impact, or have the potential to impact, EE's operations.
- 2.3 EE's obligations include those under Energy Law (such as the National Energy Retail Law, the National Energy Retail Regulations, and state derogations), Network Exemption Guideline, the *Telecommunications Act 1997*, the *Do Not Call Register Act 2006*, the *Privacy Act 1988* (Cth) and the Australian Consumer Law (as set out in Schedule 2 to the *Competition and Consumer Act 2010*).
- 2.4 The secondary purpose of the policy is to set out the procedures and strategies which will operate to ensure compliance standards and requirements are operating in accordance with the CMS.

3. Nature of the Compliance policy

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

- 3.2 EE's operational processes provide the mechanisms required to implement its compliance policies and practices.

4. Responsibilities

- 4.1 The Head of Compliance has overall responsibility for the policy and the CMS which includes selecting and overseeing the corporate governance and compliance strategies that are carried out, on a day-to-day basis, by the Compliance Committee.
- 4.2 A Compliance Committee will be formed by the Managing Director, which committee will be responsible for overseeing the implementation of the compliance program by reviewing existing controls, reviewing proposed and new regulation, and defining the scope of internal audit activities.
- 4.3 The Compliance Committee will include the Managing Director, Head of Compliance, Lead Engineer, and Head of Operations. The Compliance Committee must include the Head of Compliance.
- 4.4 The Compliance Committee is responsible for:
- a. Developing and implementing the CMS through the creation and operationalisation of policies, procedures and training programs;
 - b. Identifying new regulatory obligations and changes to existing regulatory obligations, along with ensuring that EE, through its employees and contractors, complies with these obligations;
 - c. Gathering information to investigate and resolve potential compliance breaches;
 - d. Reporting potential compliance breaches to the compliance committee, and the Australian Energy Regulator ('AER'), in accordance with EE's CMS; and
 - e. Directing the Head of Compliance to conduct compliance risk assessments as required, including audits, reviews and remediation.
- 4.5 The Managing Director owns this Compliance Policy and the CMS developed and implemented by the Compliance Committee. The Head of Compliance assists the Compliance Committee in identifying compliance risks and implementing appropriate controls.
- 4.6 Each Business Unit Manager (BM) is accountable for compliance within their business units. Each BM has responsibility for ensuring that the unit staff understand the importance and relevance of the compliance program and are properly trained in procedures. Compliance is a part of every business unit and every staff member's

role. Compliance is not something that EE outsources to the Head of Compliance, every person plays a part in compliance.

- 4.7 The applicable BMs for the purpose of this policy include the Head of Compliance, Lead Engineer, and Head of Operations.

5. Commitment to Compliance

- 5.1 EE's staff are required to comply with all industry regulations as a condition of employment.
- 5.2 To ensure staff compliance, training programs will be instituted on induction and in an ongoing manner to ensure that staff are aware of their obligations and are notified of any changes to these requirements.
- 5.3 External contracts with strategic partners and contractors also require compliance with applicable laws and regulations.
- 5.4 EE also recognises the importance of ensuring compliance when dealing with stakeholders, which include customers, regulators, government bodies, non-profit and community organisations and the wider community.
- 5.5 EE has a sharp focus on compliance and risk-assessment. This, together with its commitment to excellence, is what distinguishes EE in the industry.
- 5.6 EE is committed to ensuring that all staff, from the top down, operate within a compliance culture at all times.

6. Resources

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

7. Compliance Personnel

- 7.1 Compliance personnel are the staff responsible for overseeing the day-to-day implementation and maintenance of the policy and the CMS. Their activities include the following:
- a. Interaction with regulators and other bodies to ensure they understand the Applicable Law together with pending changes to the Applicable Law and the impact of such changes on the EE business;
 - b. Training;

- c. Creating and updating policies, standards, procedures and processes to ensure continued compliance with Applicable Law and best practice;
- d. Engaging external consultants for advice or review where necessary;
- e. Reviewing marketing material, contracts and other documentation; and
- f. Planning compliance presentations to be included at Management meetings or director meetings, as appropriate.

8. External Consultants

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

9. Software

- 9.1 EE's software systems were and will be developed with regulatory compliance and organisational effect as core requirements.
- 9.2 EE's billing system will issue invoices and apply payments in accordance with relevant regulations and guidelines.

10. Documentation

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

11. Obligations Register

- 11.1 Relevant Australian standards state that an organisation should systematically identify its compliance obligations and the implications for its activities, products and

services. The extent to which an organisation documents its compliance obligations should be appropriate to its size, complexity, structure and operations.

- 11.2 EE operates in a highly regulated environment. The Head of Compliance is responsible for identifying all relevant compliance obligations and publishing them in the Obligations Register.
- 11.3 The Obligations Register will be updated on the basis of changes to laws and other compliance obligations. This will be achieved by:
 - a. being on the mailing list of relevant regulators;
 - b. maintaining membership of industry bodies;
 - c. subscribing to relevant information services;
 - d. attending industry forums and seminars;
 - e. monitoring the websites of regulators; and
 - f. monitoring proposed regulation and decisions of courts and tribunals.

12. Compliance Risk Assessment

- 12.1 Risk assessments are conducted in accordance with the relevant standards using the following methodology: *Identification, analysis and evaluation of compliance risks*.
- 12.2 Compliance risks will be reassessed whenever there are:
 - a. New or changed activities, products or services;
 - b. Material changes to the structure or strategy of EE;
 - c. Significant external changes, such as to financial-economic circumstances, market conditions, liabilities, and client relationships;
 - d. Changes to compliance obligations; and
 - e. Non-compliance.
- 12.3 Refer to the EE Risk Management Policy (Annexure B8) for the detailed risk management framework, including the Risk Register and treatment plans.
- 12.4 As the context is further defined, risks are identified, monitored, and controlled. Risk assessment is intended to be a process of continual improvement.
- 12.5 As a function of the Head of Compliance's risk management role, regular updates are provided to the compliance committee and the Managing Director.
- 12.6 A number of compliance risks cannot be controlled, including human error. Therefore, EE actively seeks to identify and reduce the likelihood of residual risks and monitor remaining risks.
- 12.7 Residual risks that are identified in the compliance risk assessment must be reported to Management, as appropriate.

13. Training and Assessment

- 13.1 The aim of compliance training and assessment is to reinforce in all staff the understanding that regulatory compliance is core to EE's operations. A training matrix is located in Schedule A of this document.
- 13.2 Business Unit Managers provide training opportunities to their staff to address initial, continual and unique requirements.
- 13.3 Such training is to be developed by the Head of Compliance, following the identification of a need for such training from the Compliance Risk Assessment report; the implementation of new laws, codes, or guidelines; and upon request from the Compliance Committee.
- 13.4 External training providers will be utilised where appropriate.
- 13.5 All training records will be kept for the purposes of organisation and accountability.
- 13.6 Compliance retraining will be undertaken whenever there is:
 - a. Material change of position or responsibilities – affected staff only;
 - b. Material changes in internal policies, procedures or processes – all staff;
 - c. Material changes in organisational structure, where this change results in new policies or reporting lines – affected staff only;
 - d. Changes in the compliance obligations – all staff;
 - e. Changes in activities, products, or services – affected staff only; and
 - f. Whenever a breach is identified – relevant team or teams.

14. Employing Qualified Staff

- 14.1 EE will ensure that all staff have the qualifications and experience necessary to be competent in their roles and the commitment to function in compliance with all applicable laws. For example, employees working in legal or compliance areas must have, as a minimum, a Bachelor degree in law and two years of relevant experience.
- 14.2 Performance reviews are mandatory for all levels of staff and include analyses of positions to determine the currency of position descriptions governing work roles. Staff promotions and retention are dependent on commitment to regulatory compliance.
- 14.3 In performance reviews, training and development requirements of staff will be identified including those relating to statutory obligations, compliance and the minimisation of risk.

15. Monitoring Performance

- 15.1 EE will develop performance and compliance criteria based on the requirements and definitions provided by the applicable regulators.
- 15.2 EE will implement reporting procedures for actual or suspected breaches of applicable law.
- 15.3 EE will implement appropriate procedures for investigating any such report and providing related reports to Management, as appropriate.
- 15.4 Specifically, all staff are required to report actual or suspected compliance breaches to the Head of Compliance, who will, upon investigation, escalate confirmed breaches to Management.
- 15.5 Management in consultation with the Head of Compliance, will then conduct a review of the breach that has been brought to its attention and determine if:
 - a. It needs to be reported to a regulatory body; and
 - b. Further remediation action is required.
- 15.6 In addition to compliance reporting, complaints management and review are an essential part of compliance monitoring and quality improvement. Complaints provide insight into the various issues faced by customers and the areas that need to be addressed.
- 15.7 On a quarterly basis, EE has an obligation to report on the number and categories of complaints received to the relevant jurisdictional regulators as set out in the AER's Compliance Procedures and Guidelines.
- 15.8 Reports prepared pursuant to the AER's Compliance Procedures and Guidelines will be reviewed by the Head of Compliance. The Head of Compliance may develop recommendations to Management resulting from such review including, for example, to strengthen compliance controls in relation to a specific area identified within a complaint.

16. Remedial Action and Controls

- 16.1 Remedial actions taken in response to individual incidents, including compliance breaches, will be recorded and reported in the compliance reporting software.
- 16.2 A Breach Notification Form is provided at Schedule A to this Policy. The Form must be completed by the Head of Compliance for all identified or suspected compliance breaches and submitted to the Compliance Committee.
- 16.3 In consultation with the compliance committee, the Head of Compliance will establish controls to reduce the likelihood of breaches, which include, for example, training and

guidance materials; compliance controls will also be built into third-party contracts as necessary.

- 16.4 Where risk cannot be minimised to a sufficient degree using a control, the risk may be transferred to a third party by a standard contract or contract of insurance. Despite the existence of external contracts, in cases where EE has the obligation for compliance, it assumes ultimate responsibility.
- 16.5 The Head of Compliance will review existing controls on an ongoing basis to ensure their continuing effectiveness and relevance.

17. Provision of Updates and Advice

- 17.1 The Head of Compliance is responsible for notifying relevant staff of new or updated compliance requirements and delivering appropriate training programs when major changes are introduced. The methods of delivery must be appropriate to the nature and complexity of the update.
- 17.2 Compliance obligations are reviewed on an ongoing basis. EE subscribes to a number of regulatory newsfeeds, including those offered by third parties. These third parties include law firms, SAI global, and the regulators themselves.
- 17.3 EE's staff will play an active role in the development of new compliance obligations by attending and participating in industry events and consultations conducted by regulators and reviewing, at reasonable intervals, on-line information on regulations and their currency. The aim of this participation is to contribute to an improved regulatory environment for the company and beneficial outcomes for consumers and the community.

18. Review

- 18.1 The Managing Director and Head of Compliance will review this policy at least annually, having regard to the AER Compliance Procedures and Guidelines and any changes to applicable energy legislation.

Schedule A - Training Matrix

The matrix below specifies the compliance training required by role within EE. Retraining is triggered by the events listed at clause 13.6. Training records are maintained in accordance with clause 13.5.

Role	Training Required	Frequency
All staff	Compliance induction (Code of Conduct, Compliance Management System, ISO 37301 overview, breach reporting obligations)	On induction and annually
All staff	Privacy and data handling (Privacy Act 1988, Australian Privacy Principles, Notifiable Data Breaches)	On induction and every two years
All staff	Anti-bribery, anti-corruption and conflicts of interest (Annexure B11)	On induction and every two years
Customer-facing staff	Customer Hardship Policy (Annexure B5) and NERR hardship obligations (ss.44-52 NERL; r.71-75B NERR)	On induction and annually
Customer-facing staff	Family Violence Policy (Annexure B6) and NERR r.76A-76G obligations, including customer safety, documentary evidence and referral pathways	On induction and annually
Customer-facing staff	Complaints and Dispute Resolution Procedure (Annexure B4), AS 10002:2022 and NERR Part 4 Division 5	On induction and annually
Customer-facing staff	Life Support obligations (NERR r.124; NERL s.59), including registration, distributor notification and de-energisation prohibitions	On induction and annually
Managing Director and Compliance Committee	Governance, risk and compliance oversight (ISO	On induction and annually

members	37301:2021), Compliance Committee Charter (Annexure B24), Breach Notification Form	
Head of Compliance	Regulatory change management, AER Compliance Procedures and Guidelines, Obligations Register maintenance	Ongoing continuing professional development
Risk Committee members	Risk management (ISO 31000:2018), Risk Appetite Statement (Annexure B22), Risk Committee Charter (Annexure B25)	On induction and annually
All staff (retraining)	Triggered by events at clause 13.6 (role change, policy change, structural change, obligation change, product/service change, or identified breach)	As required

Annexure B3

Compliance Reporting Procedure

Classification: Public

Compliance Reporting Procedure

Eastern Electric Pty Ltd

Document Information

Document Type	Procedure
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1. Introduction

This is the Compliance Reporting Procedure of Eastern Electric Pty Ltd (EE). It sets out the manner and form in which EE identifies, assesses, classifies and reports breaches and possible breaches of its obligations under the National Energy Retail Law (Retail Law), the National Energy Retail Rules (Retail Rules) and the National Energy Retail Regulations (Retail Regulations) to the Australian Energy Regulator (AER).

This procedure is designed to operate in conjunction with:

- the AER Compliance procedures and guidelines, Version 7 (published July 2024, effective 1 April 2025) (Guidelines);
- the AER Compliance Reporting Guideline checklist at Annexure B18;
- EE's Compliance Policy (Annexure B2);
- EE's Compliance Committee Charter (Annexure B24); and
- EE's Risk Management Policy (Annexure B8) and Risk Committee Charter (Annexure B24).

EE's Compliance Management System (CMS) is designed in accordance with ISO 37301:2023 and is the system through which EE monitors its compliance and meets its obligations under section 273(2) of the Retail Law.

2. Purpose

The purpose of this procedure is to:

- establish a consistent, documented approach to identifying, investigating, assessing and reporting breaches and possible breaches of the Retail Law, Retail Rules and Retail Regulations;
- ensure that EE meets the immediate, half-yearly and material breach reporting obligations in the Guidelines;
- describe how EE will respond to compliance audits carried out by, or required by, the AER;
- allocate clear responsibility and accountability for each step in the reporting process; and
- support continuous improvement in EE's compliance performance.

3. Scope

This procedure applies to all officers, employees, contractors, secondees and third party service providers performing any function on behalf of EE that is regulated by the Retail Law, Retail Rules or Retail Regulations. Where an obligation arises under jurisdictional energy

legislation that alters, varies or removes the application of a Retail Law or Retail Rule obligation, this procedure is applied having regard to the jurisdictional variation.

4. Definitions

Term	Definition
AER	Australian Energy Regulator.
Applicable Law	The Retail Law, Retail Rules, Retail Regulations and any other law or instrument applicable to EE as an authorised retailer, including jurisdictional energy legislation.
Breach	A breach of an obligation under the Retail Law, Retail Rules or Retail Regulations, and includes any possible breach that EE believes is reasonably likely to have occurred or to occur.
Civil penalty provision	Has the meaning given in section 4(1) of the Retail Law.
Guidelines	The AER Compliance procedures and guidelines, Version 7 (July 2024, effective 1 April 2025), as amended from time to time.
Immediate reporting obligation	An obligation listed in Table 1 of Appendix A.1 of the Guidelines.
Half-yearly reporting obligation	An obligation listed in Table 3 of Appendix A.2 of the Guidelines.
Material breach	Any breach of a Retail Law or Retail Rules civil penalty provision obligation (other than those listed in Appendix A.1 of the Guidelines) that will likely have a material adverse impact on consumers or the national energy market. The factors for assessing materiality are set out in the Guidelines.
MD	Eastern Electric's Managing Director (or, if the Managing Director is unavailable, the person acting in that position).
Head of Compliance	Eastern Electric's Head of Compliance.

5. Roles and Responsibilities

The following roles and responsibilities apply in relation to compliance reporting:

Role	Responsibility
Managing Director (MD)	Approves this procedure and the CMS. Receives quarterly compliance reports from the Compliance Committee. Approves the notification of material breaches to the AER. Signs immediate, half-yearly and material breach reports submitted to the AER under the Guidelines (or ensures that an acting MD does so if the MD is on leave). Ensures adequate resourcing of the

	compliance function. Represents EE in dealings with the AER on reporting matters.
Compliance Committee	Oversees the implementation of this procedure. Reviews and classifies breaches. Approves draft reports to the AER before submission. Co-ordinates with the Risk Committee on matters with both compliance and risk dimensions.
Head of Compliance	Operates the breach register. Conducts initial classification of breaches and prepares draft reports for Compliance Committee review. Submits reports through the AER Compliance Portal. Liaises with the AER on any follow-up information requests.
Risk Committee	Oversees risk management generally and considers the risk implications of material breaches and trends (see Risk Committee Charter).
Business Unit Managers	Identify and escalate potential breaches in their business units within one business day of discovery. Support investigation and remediation.
All staff and contractors	Report any suspected or potential breach to their manager or directly to the Head of Compliance as soon as it comes to their attention.
Third party service providers	Notify EE of any suspected or potential breach arising out of services provided to EE, in accordance with EE's Third Party Selection, Management and Oversight Policy (Annexure B12).

6. Classification of Breaches

On identification of a suspected or potential breach, the Head of Compliance classifies the breach (or possible breach) into one of the following categories, consistent with clause 3.2 of the Guidelines:

- Immediate - breaches of the obligations listed in Table 1 of Appendix A.1 of the Guidelines. These relate to family violence, retailer-initiated de-energisation of small customers, life support equipment and prepayment meter systems where life support equipment is in use.
- Half-yearly - breaches of obligations listed in Table 3 of Appendix A.2 of the Guidelines. These include retail contracts, explicit informed consent, customer hardship, payment plans, billing, retailer interruptions to supply, family violence policy obligations, re-energisation, and other de-energisation obligations that are not otherwise immediately reportable.
- Material breach - any breach of a civil penalty provision under the Retail Law or Retail Rules (other than those in Appendix A.1) that will likely have a material adverse impact on consumers or the national energy market, assessed against the factors in the Guidelines.

Where a breach is classified as immediate and also affects obligations ordinarily reported half-yearly, the matter is reported on an immediate basis.

For the purposes of classification, a reference to a breach includes any possible breach that EE believes is reasonably likely to have occurred or to occur.

7. Immediate Reports

Where the Head of Compliance classifies a breach as an immediate reporting obligation, EE will submit an initial report to the AER no later than 2 business days after the breach has been identified by EE.

The initial report is prepared using the proforma at Appendix B.1 of the Guidelines, is accompanied by the information required by Appendix B.3 of the Guidelines (see also Appendix 3 of this procedure), and is submitted via the AER Compliance Portal. Email submission to AERCompliance@aer.gov.au will only be used if the AER approves that method.

If the initial report is not signed by the MD, a final report signed by the MD (or acting MD) is submitted within 20 business days after the initial report.

On receipt of an initial report, the Head of Compliance maintains contact with the AER and responds promptly to any request by the AER for further information.

8. Half-Yearly Reports

EE submits half-yearly reports to the AER covering breaches of obligations listed in Table 3 of Appendix A.2 of the Guidelines. The reporting timetable is:

- H1 reporting period (1 July to 31 December) - due no later than 28 February of the following year.
- H2 reporting period (1 January to 30 June) - due no later than 31 August of the same year.

Half-yearly reports are prepared using the proforma at Appendix B.2 of the Guidelines, are accompanied by the information required by Appendix B.3 of the Guidelines (see Appendix 3 of this procedure) and are signed by the MD (or acting MD).

Where multiple breaches arise from a single error or incident, from multiple customers being affected by the same incident, or from the same recurring or systemic cause, EE may group those breaches as a single entry in the half-yearly report in accordance with clause 3.23 of the Guidelines. In those cases the report will include the date of the first and last breach during the reporting period, the number of breaches in each month (or week, for shorter timeframes), the number and nature of affected customers, and the maximum, minimum and average financial impact on affected customers.

If EE has not identified any breaches of reportable obligations during a half-yearly reporting period, the Head of Compliance will prepare a 'NIL return' using the proforma at Appendix B.2 of the Guidelines for signature by the MD.

Reports are submitted via the AER Compliance Portal. Email submission to AERCompliance@aer.gov.au will only be used if the AER approves that method.

9. Material Breach Reports

EE will report a material breach to the AER as soon as reasonably practicable after the breach has been identified by EE. Pending the Compliance Committee meeting where the breach is formally reviewed, the Head of Compliance commences preparation of the report and briefs the MD on the proposed approach.

The Compliance Committee will assess whether a breach is material against the factors in the Guidelines. Where the Committee is uncertain whether a breach is material, it will take a conservative approach and report the breach as material. The Compliance Committee approves the classification and the notification of material breaches to the AER.

The material breach report is prepared using the proforma at Appendix B.1 of the Guidelines and is accompanied by the information required by Appendix B.3 of the Guidelines (see Appendix 3 of this procedure). If the initial material breach report is not signed by the MD, a final material breach report signed by the MD (or acting MD) is submitted within 20 business days after the initial material breach report.

Reports are submitted via the AER Compliance Portal. Email submission to AERCompliance@aer.gov.au will only be used if the AER approves that method.

10. Requesting an Extension of Time

If the Head of Compliance considers that EE will be unable to meet a submission deadline, the Head of Compliance will, in consultation with the MD, write to AERCompliance@aer.gov.au before the relevant deadline specifying the length of the extension sought and the reason for the request. EE will comply with any revised date set by the AER.

11. Form and Content of Reports

Every report submitted under this procedure includes, at a minimum, the information required by Appendix B.3 of the Guidelines. The full list of reporting fields is reproduced at Appendix 3 of this procedure and is used as a template by the Head of Compliance when preparing reports.

Where a breach has been identified but has not been rectified at the time of submission, the Head of Compliance will provide regular updates to the AER on the status of the breach until the AER is satisfied that it has been rectified.

12. Compliance Audits

The AER may carry out a compliance audit under section 275 of the Retail Law, or require EE to carry out a compliance audit under section 276 of the Retail Law, in accordance with Part 4 of the Guidelines. EE will respond to both types of audits in accordance with this procedure.

Audits carried out by the AER

Where the AER carries out a compliance audit, the Head of Compliance acts as the primary point of contact with the appointed Auditor. EE will attend the initial meeting convened by the AER and will provide the Auditor with access to all relevant records (including complaints registers, training and induction materials and documents created by EE's consultants or legal advisers for use in EE's activities), officers, employees and third party service providers. EE will take all reasonable steps to meet the timelines determined by the AER. EE will pay the invoice issued by the AER in relation to the reasonable costs of a compliance audit within 30 business days of its issue.

Audits required to be carried out by EE

Where the AER requires EE to carry out a compliance audit, the Head of Compliance will, within 20 business days of receiving notice (or such other period as is agreed with the AER), submit an Audit Proposal to the AER. The Audit Proposal will identify whether the audit will be conducted internally or by a third party, explain how the auditor meets the requirements of clause 4.3 of the Guidelines, and describe how access will be provided to records, personnel and advisers. Where a third party auditor is proposed, the proposal will be prepared with that auditor's input and will clearly identify them.

Where the AER requires a revised proposal, the Head of Compliance will submit one within the time specified by the AER.

EE will provide the final audit report to the AER within 20 business days of the conclusion of the audit (or as otherwise agreed with the AER). The report will include the evidence gathered, the name and qualifications of the auditors, findings against the Terms of Reference and the auditor's recommendations, and an audit summary in the template supplied by the AER.

The final report will be accompanied by a letter on EE letterhead signed by the MD (or acting MD) acknowledging the findings and setting out how, and in what timeframes, EE proposes to address each finding, how EE will keep the AER informed of progress, and any finding that EE considers does not need to be addressed (and the reasons).

13. Breach Register and Record-Keeping

The Head of Compliance maintains a Breach Register that captures each identified breach or possible breach from the point of identification through classification, investigation, remediation and closure. The Breach Register forms the source data for half-yearly reports and supports the information required by Appendix B.3 of the Guidelines.

The Breach Register and all supporting records (including reports submitted to the AER, AER responses, audit reports and remediation evidence) are retained for at least seven years.

14. Training and Awareness

All new staff receive induction training on this procedure, including how to recognise and escalate a potential breach. Existing staff complete refresher training at least annually. Role-specific training is provided to staff with responsibilities under this procedure (for example, billing, customer service, hardship, family violence and metering). Training completion is recorded and reported to the Compliance Committee.

15. Review and Continuous Improvement

The Head of Compliance reviews this procedure at least annually, and otherwise when the Guidelines are amended, a material breach occurs that identifies a procedural gap, or an AER audit recommends changes. Proposed amendments are submitted to the Compliance Committee for review and to the Managing Director for approval.

Annexure B4

Complaints and Dispute Resolution Procedure

Classification: Public

Complaints and Dispute Resolution Procedure

Eastern Electric Pty Ltd

Document Information

Document Type	Procedure
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Version 1.0	Initial draft	CQ
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1. What is this document?

- 1.1 Everybody has the right to complain. We are committed to promptly acknowledging, assessing, and resolving complaints efficiently in an impartial and unbiased manner.
- 1.2 This document sets out our procedures for accepting, recording, and resolving complaints in accordance with the National Energy Retail Rules (NERR) Part 4 Division 5 (Small customer complaints) and AS 10002:2022.
- 1.3 Through this document, we make the commitment to addressing issues raised within complaints within a reasonable timeframe, adopting a people-focused and proactive approach, and to continual quality improvement. We will review complaints on an ongoing basis to identify any potential non-compliance and areas for improvement. We aim to minimise the possibility of complaints escalating into ongoing disputes.

2. What is a complaint?

- 2.1 A complaint is an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. Where it is not clear if feedback or a general concern is intended to be handled as a complaint, where appropriate, we will seek clarification.
- 2.2 Complaints may be lodged without contact information and where it appears that the complainant wants to remain anonymous, we will, to the extent reasonably practicable, not request the complainant's active involvement in the management of the complaint.
- 2.3 We will consider all complaints as opportunities to improve, and they will be freely received by telephone, in writing (for example, letter, email, facsimile) or in person.
- 2.4 Complaints may be raised in relation to (amongst other areas), any:
 - a. Failure by us to observe our published or agreed practices or procedures;
 - b. Failure in respect of a product or service offered or provided by us or our representatives;
 - c. An instance where you involve or seek information about a third party, such as the jurisdictional energy ombudsman or a Member of the Parliament; and
 - d. An occurrence where a complaint is directed to us on your behalf by an energy ombudsman.
- 2.5 Our organisation takes a proactive stance on managing complaints efficiently and professionally. We ensure that our approach to handling complaints is thorough and fair, rooted in a culture of prompt and unbiased resolution.

- 2.6 We commit to:
- a. Actively supporting the handling of complaints at all levels of leadership;
 - b. Establishing clear policies and procedures for managing complaints effectively;
 - c. Holding our management accountable for creating a welcoming environment for feedback and complaints;
 - d. Allocating the necessary resources, including training and support, for our staff to manage complaints effectively; and
 - e. Providing assistance to those who may find it difficult to navigate the complaint process.

3. What do we commit to do?

- 3.1 In all instances, we will:
- a. Treat you with respect;
 - b. Take your complaint seriously;
 - c. Respect your privacy;
 - d. Manage your complaint with impartiality;
 - e. Properly investigate and report on your complaint;
 - f. Resolve your complaint with proper consideration to facts;
 - g. Provide the option of internal escalation or a referral to an energy ombudsman scheme when requested or appropriate; and
 - h. Ensure equal access to our complaints management program and fair resolutions.
- 3.2 EE will handle all personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. Refer to the EE Privacy Policy (Annexure B7) for further details.
- 3.3 You have rights under various laws, including the Competition and Consumer Act 2010 (Cth), and the Energy Law. We will ensure that those rights are respected.

4. How will we manage complaints?

- 4.1 We will follow the guiding principles contained in AS 10002:2022 (Guidelines for Complaints Management in Organisations). This procedure is also aligned with the requirements of the NERR Part 4 Division 5 regarding small customer complaints.
- 4.2 Once a complaint has been received, one of our personnel will acknowledge the complaint and prioritise it for resolution. We will respond and acknowledge receipt of

each complaint within three (3) business days. However, higher priority will be given to those complaints where there is perceived financial hardship, the disconnection of energy supply, and matters relating to health and safety. In such instances, we will respond as soon as possible.

EE will use its best endeavours to resolve complaints within 20 business days of receipt. Where a complaint cannot be resolved within this timeframe, EE will inform the customer of the reasons for the delay and provide an estimated resolution date.

- 4.3 Complaints are recorded in our customer management system as soon as they are received. Complaints and all relevant information will be recorded, and a unique identifier will be provided. Each recording will include:
- a. Your requested resolution;
 - b. The date of your complaint;
 - c. A description of your complaint; and
 - d. The expected date for a response or resolution.
- 4.4 More than one complaint can be made per customer/call. For example, if a customer makes a billing complaint and then makes a marketing complaint during the same call, two complaints will be recorded. Each individual customer contact with a complaint will be recorded and categorised as one, irrespective of the number of times a caller has contacted us on an issue.
- 4.5 Complaints will be tracked from the time they are received to their resolution. When tracking the resolution of complaints, we will make sure to meet response deadlines. We will keep you informed and updated regularly throughout the process.
- 4.6 We are committed to resolving all complaints effectively and promptly. Tailored solutions will be offered for each case, ensuring they fit the specific issues raised.
- 4.7 Keeping the complainant informed is crucial, especially if there are delays. After resolving the complaint, we'll communicate:
- a. What we did in response to the complaint;
 - b. The outcome;
 - c. Why we made certain decisions;
 - d. Any offered solutions or next steps; and
 - e. Other options the complainant might pursue, like internal or external review.
- 4.8 Communication should be comprehensive, focusing on our organisation's actions and their impact on the complainant. If a complaint involves a staff member, we'll handle the information sensitively, respecting privacy.
- 4.9 We will conduct root cause analysis on all complaints to identify underlying systemic issues in accordance with AS 10002:2022 clause 9. The outcomes of root cause

analysis will inform corrective actions and process improvements to prevent recurrence of similar complaints.

- 4.10 We'll make sure that any changes we've agreed upon are put into action and tracked. The complaints manager or a senior team member will oversee this.
- 4.11 All complaint records, including correspondence, investigation notes, outcomes, and remedial actions taken, will be retained for a minimum of two (2) years from the date of resolution, or longer where required by applicable law or regulation, in accordance with our record-keeping obligations.
- 4.12 In all instances, we will:
 - a. Freely accept complaints lodged on our website, in person, or by telephone, email, or letter;
 - b. Acknowledge any complaint received as soon as possible and generally no later than three business days of receipt;
 - c. Confirm the next steps including the complaint process, expected timeframes, your involvement, and the possible or likely outcomes of the complaint, where practicable;
 - d. Begin an investigation into the reasons for a complaint within 24 hours of acknowledgment;
 - e. Keep you updated about the investigation and any proposed resolution;
 - f. Notify you as soon as possible of the outcome of our investigation and any proposed resolution; and
 - g. Provide you with the option of an internal review of your complaint if you are unsatisfied with the outcome of the investigation or the proposed resolution.

5. Internal and External Escalation

- 5.1 There are three levels of escalation of complaints. First, most complaints will be managed by front line staff. At any time, you may request an internal escalation of your complaint, which will be granted. Complaints will also be escalated where they are complex, urgent, or sensitive. When your complaint is received, you will be informed that you have the right to escalate it if you are dissatisfied with the process. Individual staff who manage complaints will be required to review the complexity, urgency, and sensitivity of all complaints and seek assistance from a supervisor or specialist where required.
- 5.2 If you are not satisfied with our response to your complaint or you wish to seek independent advice about a complaint, we will notify you that you can contact the

Energy Ombudsman in your State. In accordance with NERR rule 80, we will inform you of your right to raise a complaint with the relevant energy ombudsman at the time of your first contact with us regarding any complaint.

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

6. Responsibilities

- 6.1 All of our staff must comply with this procedure as well as the Retail Law and Retail Rules and any Guidelines or Procedures published by the Australian Energy Regulator (AER), and the Australian Energy Market Operator (AEMO). Complaints can be made to any Eastern Electric employee or contractor. That employee or contractor is then required to report any complaints received to the Customer Service Manager.
- 6.2 All employment contracts will stipulate that employees are obligated to report on any suspected compliance breaches. We will ensure that complaint management is not hindered by a lack of resources. We will also ensure that adequate programs are in place to train staff in complaint resolution and the implementation of this procedure.
- 6.3 Top-level management of Eastern Electric is responsible for:
- a. Establishing the complaints management program;
 - b. Establishing and implementing the process of complaints management;
 - c. Allocating resources to ensure compliance with obligations under applicable laws and this procedure;
 - d. Promoting and advocating a customer-centric approach to complaint resolution;
 - e. Reporting to the Managing Director on the management of complaints, including the number and nature of complaints received;
 - f. Continually reviewing the effectiveness of the complaints management program, including the program's processes; and
 - g. Establishing an adequate training program to ensure all relevant staff, agents, contractors, and other representatives comply with this procedure.

7. Monitoring and Improving

- 7.1 Complaints will be tracked at individual and group levels. Any systemic issues that are identified will be brought to the attention of the Compliance Committee and Managing Director during their monthly meetings.

- 7.2 In addition, a quarterly complaints report will be prepared and presented to the Managing Director. This report will include complaint volumes, categories, resolution timeframes, root cause analysis findings, and any trends or systemic issues identified. This reporting supports our obligations under the NERR and AS 10002:2022 clause 9 to conduct root cause analysis and monitor complaint handling effectiveness.
- 7.3 EE's Managing Director will direct top-level management to address systemic issues that are identified during a complaint process.

8. Promoting our Complaints Management Program

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

9. Customer Read Estimates

- 9.1 If you are a "small customer" with an accumulation meter, you have the right to conduct your own meter reading if your bill is based on an estimate. This self-read is known as a "customer read estimate." You can find more information on customer read estimates at our website.
- 9.2 Where we have not accepted a customer read estimate, we will notify you of the reasons for the decision and allow the opportunity to rectify the self-read.
- 9.3 We will deal with complaints regarding customer read estimates in accordance with our standard complaints process, which is outlined in this procedure.

10. Contact Us to Lodge a Complaint

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

Our contact details:

Email: [REDACTED]

Post: [REDACTED]

Phone: [REDACTED]

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

11. Contact details for the Energy Ombudsman Schemes

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

Energy and Water Ombudsman of NSW

Post: PO Box 1343, Haymarket NSW 1240.

Freepost: Reply Paid 86550, Sydney South NSW 1234.

Free call: 1800 246 545

Free fax: 1800 812 291

Email: complaints@ewon.com.au

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

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

Energy and Water Ombudsman Queensland

Free call: 1800 662 837

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

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

Fax: (07) 3006 2670

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

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

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

Energy and Water Ombudsman South Australia

Free call: 1800 665 565

National Relay Service: 133 677

Translating and interpreting service (TIS): 131 450

Post: GPO Box 2947 Adelaide SA 5001

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

Energy and Water Ombudsman Victoria

Free call: 1800 500 509

Translating and interpreting service (TIS): 131 450

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

Email: ewovinfo@ewov.com.au

Post: Reply Paid 469 Melbourne VIC 8060

Energy and Water Ombudsman Tasmania

Free call: 1800 001 170

Translating and interpreting service (TIS): 131 450

Online: <https://www.energyombudsman.tas.gov.au/enquiries-and-complaints>

Email: energy.ombudsman@ombudsman.tas.gov.au

Post: GPO Box 960, HOBART TAS 7001

Civil and Administrative Tribunal (ACT)

Phone: (02) 6207 1740

Translating and interpreting service (TIS): 2M Language Services - www.2m.com.au

Online: <https://www.acat.act.gov.au>

Email: tribunal@act.gov.au

Post: GPO Box 370, CANBERRA ACT 2601

Annexure B5

Customer Hardship Policy

Classification: Public

Customer Hardship Policy NECF

Eastern Electric Pty Ltd

Document Information

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Jurisdiction(s)	National Energy Customer Framework (NECF)
Date Last Revised	April 2026

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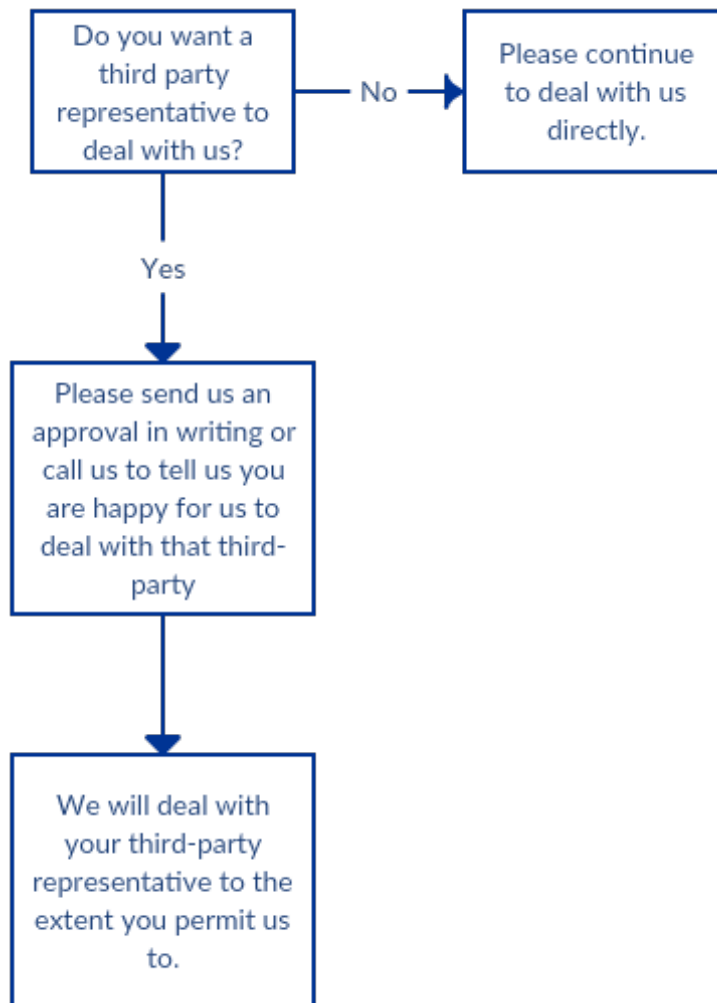
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1. Introduction

- 1.1 This Policy applies to all residential customers living in Queensland, New South Wales, the Australian Capital Territory and South Australia who find it hard to pay their energy bills due to hardship. You might experience hardship because of factors like:
- a. Death in the family
 - b. Household illness
 - c. Family violence
 - d. Unemployment
 - e. Reduced income
- 1.2 This Policy explains:
- a. What we will do to help you manage your energy bills
 - b. How we consider your circumstances and needs
 - c. Your rights as a customer in our hardship program
- 1.3 You can ask a support person to contact us, such as:
- a. A financial counsellor
 - b. Someone who helps you manage your energy bills
- 1.4 We need your permission to talk to your support person.
- 1.5 You may provide your permission for us to deal with a third party support person via whatever means are convenient to you.
- 1.6 If you would like a support person to represent you, you may request this at any time, and we will send a consent form or phone you to ensure that you consent (we will accept consent via whatever means are convenient to you).
- 1.7 Where you have elected a support person to act on your behalf, we will engage with that support person as we would with you.
- 1.8 The diagram below summarises our approach.



2. About our hardship Policy

- 2.1 We support customers who are experiencing hardship. Electricity is an essential service, so we must do as much as possible to help you maintain access to your supply of electricity.
- 2.2 We have developed this Hardship Policy in accordance with the AER's Customer Hardship Policy Guideline (April 2019) (Hardship Guideline) to provide consistent and compliant support to all our customers. We believe early intervention is the best way to help customers who face financial difficulty pay their bills and prevent an accumulation of energy debt which could ultimately threaten a customer's energy supply.
- 2.3 We have systems in place to ensure that we meet our obligations with respect to customer hardship in:
 - a. The National Energy Retail Law
 - b. National Energy Retail Rules
 - c. The AER Customer Hardship Policy Guideline

- d. The Customer Hardship policy

3. Our Hardship commitment

3.1 As an Eastern Electric Pty Ltd (**EE**) customer, we will:

- a. Provide you with clear information in a timely manner on what assistance is available to you under this Policy
- b. As soon as reasonably practicable, provide you with the assistance you are entitled to under this Policy
- c. Be respectful, compassionate and treat your circumstances with sensitivity and respect for your privacy
- d. Take into account all of your circumstances which we are aware of, and, on that basis, act fairly and reasonably in dealing with a customer who is experiencing payment difficulties due to hardship.
- e. Provide you equitable access to this Policy and ensure that it is consistently applied in a transparent way
- f. Waive any late payment fees if you are a participating in the Hardship Program
- g. Maintain customer assistance programs, such as affordable payment plans
- h. Regularly monitor your account during your participation in our hardship program, including quarterly reviews of your payment plan to make sure it remains affordable and you are receiving the right assistance at the right time
- i. Monitor and report on hardship program performance indicators as required by the AER Hardship Guideline, including the number of customers entering and exiting the program, average debt levels on entry and exit, the number of customers successfully completing payment plans, and disconnection rates for hardship customers
- j. Be transparent and accessible and communicate to you, your nominated support person, financial counsellors and community assistance agencies when necessary
- k. Not disconnect your energy supply while you are actively participating in our hardship program

4. Accessing our Hardship Policy

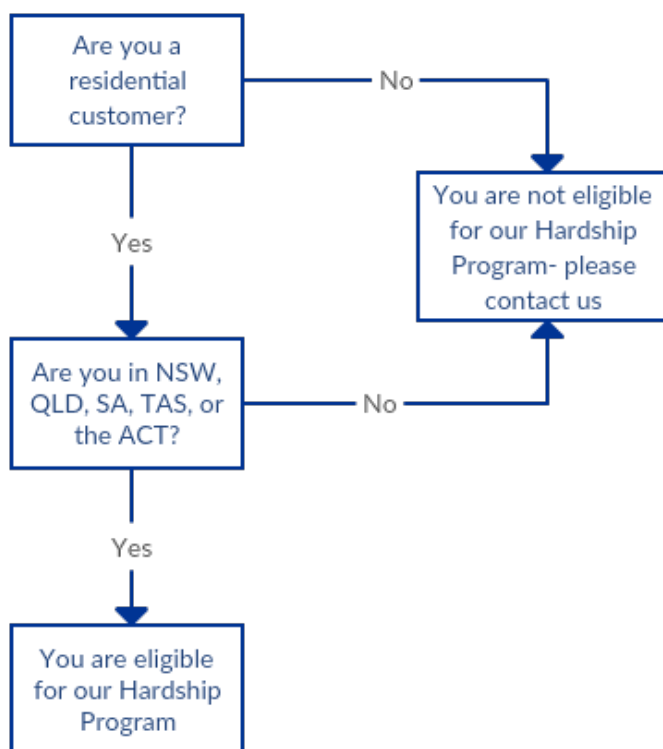
4.1 You can access a printable version of our Hardship Policy via the URL/hyperlink on the homepage of our website. If you are unable to access our website, we can

provide you with a copy of this policy for free in another way. Please contact us if you would like us to provide you with a copy by email, or send you a copy by post.

- 4.2 If you have specific communication requirements, such as limited internet access, low proficiency in English, residence in a remote area, or a need for an interpreter, please inform us and we will work with you to ensure that you can access our hardship policy.

5. Eligibility for EE's Hardship Program

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



6. Re- Entry into EE's Hardship Program

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

7. What we will do to help you

- 7.1 We will tell you about our hardship program if:
 - a. You tell us you are having trouble paying your bill
 - b. You are referred to our program by a financial counsellor or other community worker
 - c. We are concerned that you may be experiencing financial hardship.
- 7.2 We will recommend you speak to a staff member to help you join our hardship program if you have:
 - a. A history of late payments
 - b. Broken payment plans
 - c. Requested payment extensions
 - d. Received a disconnection warning notice
 - e. Been disconnected for non-payment
- 7.3 We can also support you to join our hardship program if you tell us:
 - a. You are eligible for a relief grant or other emergency assistance
 - b. You have personal circumstances where hardship support may help. For example, death in the family or job loss
- 7.4 You may have trouble paying your bills for different reasons. Please contact us so we can discuss your individual situation.
- 7.5 Our staff are specially trained to help you with hardship. Staff will:
 - a. Ask you a few questions about your circumstances
 - b. Work out if you can join the hardship program.
- 7.6 We will assess your application for hardship assistance within 5 business days after contacting us.
- 7.7 We will let you know if you are accepted into our hardship program within 10 business days from receipt of the application.

- 7.8 If you are accepted into our hardship program, we will:
- a. Tell you if you are on the right energy plan or if there is a better plan for you
 - b. Tell you about government concessions, relief schemes or energy rebates you may be able to receive
 - c. Give you ideas about how to reduce your energy use
 - d. Talk to you about a payment amount that suits your circumstances
- 7.9 We can send you a free copy of our Hardship Policy.
- 7.10 Your free copy of our Hardship Policy will be sent to you via your preferred form of written communication.

8. Payment options

- 8.1 There are different payment options available to hardship customers, including:
- a. Payment plans
 - b. Centrepay
- 8.2 When you are in our hardship program, we will offer you flexible payment options to suit your individual situation.
- 8.3 To make your payment plan, we will consider:
- a. How much you can pay
 - b. How much you owe
 - c. How much energy we expect you will use in the next 12 months.
- 8.4 In accordance with NERR rule 72, any payment plan offered must have regard to the customer's capacity to pay, any arrears owing by the customer, and the customer's expected energy consumption over the following 12 months. The payment plan must be established in a manner that is fair and reasonable having regard to the customer's circumstances.
- 8.5 We will offer a payment plan to suit your situation. This will include payments to cover:
- a. What you owe
 - b. An amount to cover your energy use.
- 8.6 Once we agree to a payment plan, we will send you information including:
- a. Who you can contact for more help
 - b. How long the payment plan will go for
 - c. The amount you will pay each time
 - d. How many payments you need to make
 - e. When you need to make your payments (this is also called the frequency of the payments)
 - f. How we worked out your payments

- 8.7 You can choose to use Centrepay, if you are eligible.
- 8.8 Centrepay is a free service you can use to help pay your bills. Centrepay can automatically take an amount of money from your Centrelink payments to go toward energy bills and expenses.
- 8.9 We will see if another energy plan may be better for you. If you agree, we can transfer you to a better energy plan for free.
- 8.10 Depending on the rules in our Hardship Policy, we may be able to remove some debt, fees or charges you owe. If you miss a payment, we will contact you to see if you need help. We will contact you by your preferred form of communication.
- 8.11 If this contact fails, EE will try again within 2 business days. If you fail to respond on our second attempt, we will make a third attempt 2 business days later. If contact is made, we can look to adjust the plan as above.
- 8.12 Tell us if your situation changes and you can no longer make the payments in your plan. We can then review your payment arrangements.
- 8.13 Tell us if your contact details change.
- 8.14 We may stop helping you if you:
 - a. Stop making payments under your plan
 - b. Do not tell us when your contact details change.
- 8.15 If you have had two payment plans cancelled in the last 12 months because you did not follow your plan:
 - a. We do not have to offer you another plan
 - b. We might disconnect your energy.

9. Successful Completion

- 9.1 If you have successfully completed a payment plan or have been able to meet all outstanding payment obligations to EE, you can request to be removed from the hardship program at any time.
- 9.2 Once confirmed, we will contact you confirming successful completion of the payment plan. You will then be returned to EE's normal billing cycle.

Steps we will take

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

Changing a Payment Plan

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

Leaving a payment plan

- 9.5 You can return to normal billing and collection processes if you complete the payment plan or pay any previous bill arrears.
- 9.6 If you stop meeting your instalment payments EE will attempt to contact you by your preferred method to discuss whether there needs to be changes made to the original payment plan. We can reassess the original payment plan and make changes to help restore payments.
- 9.7 If this contact fails, EE will try again within 2 business days. If you fail to respond on our second attempt, we will make a third attempt 2 business days later. If contact is made, we can look to adjust the plan as above.
- 9.8 It is important that you actively participate with our hardship program. If you refuse to engage with us after these repeated attempts to make contact, we will remove you from our hardship program.
- 9.9 You may leave the hardship program by transferring to another retailer.
- 9.10 If, as a participant in the hardship program, you fail to make payments as per the agreed payment plan and refuse to engage with us, or if you transfer to another retailer, you will default back to our usual debt collections process.
- 9.11 Disconnection and debt collection are EE' absolute last resort.
- 9.12 In accordance with NERR Part 3 Division 3, EE must not commence debt recovery proceedings or arrange for disconnection of a customer's energy supply while the customer is complying with an agreed payment plan under this hardship program. Where a customer has been removed from the hardship program and is subject to debt recovery, EE will ensure the customer is informed of their right to contact the relevant energy ombudsman.

10. Other Supports to help you Pay your Energy Bill

- 10.1 Depending on the state or territory you live in, there are other supports to help you pay your energy bills.
- 10.2 We will tell you about other ways you can get help to pay your energy bill, such as:
- a. Government relief schemes
 - b. Energy rebates
 - c. Concession programs
 - d. Financial counselling programs

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

11. Information about government concessions and rebates

- 11.1 There are a variety of Government concession and rebate schemes that can assist low income, vulnerable or medically dependent customers. For customers in hardship, we can help customers identify concessions or rebates they may be eligible for and help with applications to the appropriate authorities. In some circumstances we can check the CCES (Centrelink Confirmation e-services) to determine a customer's eligibility for some concessions.
- 11.2 If we become aware that you may be entitled to a concession or rebate or any other form of assistance, we will notify you by email or phone. Further information on relevant assistance programs can be found by visiting the following websites:
- 11.3 EE is obligated under the AER Hardship Guideline to proactively inform hardship customers about available energy concession programs, government rebates, and emergency assistance schemes at the time of entry into the hardship program and at each subsequent review. This includes providing clear and accessible information about eligibility criteria and application processes for each available program.
- New South Wales, visit www.energy.nsw.gov.au/energy-consumers/financial-assistance
 - Queensland, visit www.communities.qld.gov.au or call 13 74 68
 - South Australia, visit www.dcsi.sa.gov.au or call 1800 307 758
 - ACT, visit www.acat.act.gov.au

12. Information about financial counselling & advice

- 12.1 We encourage those customers within our Hardship Program to speak to accredited financial counsellors. This is a free service whereby the financial counsellor works with you to help you take control of your finances. To find a financial counsellor in your area, please phone 1800 007 007 or visit <http://www.financialcounsellingaustralia.org.au>.
- 12.2 Further, the National Debt Helpline is a not for profit service that helps people tackle their debt problems and offer free, independent and confidential advice. Visit <http://www.ndh.org.au/>

13. Further information about Centrepay

- 13.1 Hardship customers who receive Centrelink benefits or allowances, are eligible to use Centrepay as a payment method. Centrepay is a free service allowing customers

to setup and manage regular deductions from their Centrelink payment to help pay their energy bills. If not stated in their existing market contract, hardship customers who are eligible to use Centrepay will be allowed to use Centrepay as a payment method.

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

14. Our programs and services

- 14.1 As a hardship customer, you can access a range of programs and services to help you, including:
- a. Flexible payment options;
 - b. Review of your tariff to determine if another one of our tariffs would be more appropriate;
 - c. Information about your energy use;
 - d. Advice on how you can reduce your energy use;
 - e. Advice on concessions and other assistance that may be available to you.
- 14.2 We will consider your individual situation to find the right programs (e.g. concession programs) or services that meet your needs.

15. We want to Check you have the right Energy plan

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

16. We will work with you

- 16.1 If you have joined our hardship program, we will not:
- a. Charge late payment fees
 - b. Require a security deposit
 - c. Make changes to your plan without your agreement. For example, we will not put you on a shortened collection cycle unless you agree first.

17. We can help you Save Energy

- 17.1 Using less energy can save you money:

- 17.2 When you join our hardship program, we can give you tips to use less energy. This can be different depending on the state or territory you live in.
- 17.3 Most customers are unaware of simple things they can do around their home which can reduce energy consumption, thus saving them money.
- 17.4 These websites offer some good advice on energy savings tips to help you understand how your household appliances and energy usage affect your energy bills:
- <http://yourenergysavings.gov.au>
 - <http://www.energyrating.gov.au>
 - <https://www.choice.com.au>
 - <https://www.moneysmart.gov.au>
- 17.5 Please give us a call or email us to find out if you may be eligible for an in-home energy audit. We will conduct an initial assessment to determine whether you would benefit from an in-home energy audit, and if so, we can help organise one for you. After our initial assessment we will provide a quote for the in-home energy audit and we will explain whether we will fully or partially cover the cost of the in-home energy audit. We may offer such an in-home energy audit free of charge, for example, if there is high unexplained electricity consumption within your household and your debt level is high.
- 17.6 You are not required to agree to an in-home energy audit to be accepted into our hardship program.

18. What we will do to help you

- 18.1 We recognise the need to ensure that we communicate effectively with customers with different needs including:
- a. customers with low English literacy, including customers from culturally and linguistically diverse backgrounds
 - b. customers without internet access
 - c. customers with disability, and
 - d. customers in remote areas
- 18.2 We will ensure that our customers have support with respect to communicating about the Hardship Policy and Hardship Program including:
- a. Referral to language services where available or appropriate;
 - b. Communicating via phone or post in accordance with the customer's preferred method of communication;
 - c. Ensuring that customers aren't disadvantaged by delays in communication;
- and

- d. Referral to services that support customers with disabilities.
- 18.3 If you are in our hardship program or are looking to enter the program, and live in a regional area or do not have access to the internet, we can, upon request, provide all relevant material by post for free, making sure that postage delays do not disadvantage you.
- 18.4 If you have not indicated a preference for how you wish to receive written communication, we will send you the Hardship Policy to you via post.
- 18.5 We will provide bills and documentation in large print where this would be helpful to you.
- 18.6 If you need an interpreter, please call the Translating and Interpreting Service (TIS National) on 131 450.
- 18.7 If you are deaf or have a hearing or speech impairment, please call the National Relay Service on 133 677.
- 18.8 If you have any difficulty accessing these services, our staff can help you to do so.

19. Contact us

- 19.1 If you find you are struggling to meet your payment obligations or wish to discuss forms of assistance that may be available to you with a member of our staff that is specifically trained to assist you with any payment difficulties, please contact us as soon as possible by:
- 19.2 If you need an interpreter, please call the Translating and Interpreting Service (TIS National) on 131 450.
- 19.3 If you are deaf or have a hearing or speech impairment, please call the National Relay Service on 133 677.

20. Complaints

- 20.1 EE will work with you to resolve any complaints you may have. If you have a complaint, you can contact us by email [REDACTED] or post at [REDACTED]
[REDACTED] You can also call [REDACTED] to leave a complaint.
- 20.2 Once a complaint has been received, a representative from EE will immediately acknowledge the complaint and prioritise it for resolution.
- 20.3 Complaints about this Policy or the Hardship Program will be given high priority and we will try to respond as soon as possible.
- 20.4 In all instances, EE will:

- a. Freely accept complaints lodged on our website, in person, by telephone, facsimile, email or letter;
 - b. Acknowledge any complaint received as soon as possible;
 - c. Begin an investigation into the reasons for a complaint within 24 hours of acknowledgment;
 - d. Keep the complainant updated about the investigation and any proposed resolution;
 - e. Notify the complainant as soon as possible of the outcome of our investigation and any proposal we have for resolution; and
 - f. Provide the complainant with the option of an internal review of their complaint if they are unsatisfied with the outcome of the investigation or the proposed resolution.
- 20.5 As per our Standard Complaints and Dispute Resolution Procedures, if you are not satisfied with our proposed resolution, you can escalate your complaint within the business. If you are unhappy with the outcome or at any other time, you can submit your complaint to the Energy and Water Ombudsman in your state. The ombudsman schemes offer a free complaint resolution service to customers and can be contacted in the following ways:

21. Training

- 21.1 Our staff (including any employees, independent contractors, sub-contractors, agents and other third parties who work with us and deal with our customers) will receive regular face to face and online webinar training on:
- a. answering customer queries about the customer hardship policy and hardship program, and
 - b. identifying customers experiencing payment difficulties due to hardship, and
 - c. assisting customers experiencing payment difficulties due to hardship
- 21.2 Our training programs will be reviewed and refreshed on a regular basis. Whenever the Hardship Policy or training materials are updated, staff will receive refresher training to ensure that their knowledge is up to date.
- 21.3 Staff will attend meetings and training provided by financial counsellors and community organisations to assist in understanding the issues that may be faced by customers.
- 21.4 A record of training will be kept for all staff.

22. Privacy

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

23. Review of the policy

- 23.1 This policy will be reviewed at least annually.
- 23.2 This policy operates within the broader payment difficulty framework established by the NERL and NERR. EE recognises that customers may experience varying levels of payment difficulty, and will ensure that customers who are not eligible for the hardship program, or who do not wish to participate, are offered alternative payment arrangements and assistance in accordance with the NERR.

Annexure B6

Family Violence Policy

Classification: Public

Family Violence Policy NECF

Eastern Electric Pty Ltd

Document Information

Document Type	Policy
Jurisdiction(s)	National Energy Customer Framework (NECF)
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1. Policy Statement

- 1.1 Our organisation recognises that family violence is a serious and widespread issue that affects the whole community. This policy is developed in accordance with the National Energy Retail Rules (**NERR**) rule 56A (Family violence provisions) and the AER Statement of Expectations on Family Violence (August 2022).
- 1.2 We are committed to providing customers affected by family violence with confidential support and flexible payment arrangements to help manage their needs. The safety of affected customers is our primary concern in all our interactions and service delivery.
- 1.3 We are committed to making sure that this policy remains effective, up to date, and aligned with best practice. We will review this policy at least once every 12 months against the AER Statement of Expectations on Family Violence and any updated guidance, or sooner if there are significant changes to legislation, regulatory guidelines, or customer needs.
- 1.4 To support continuous improvement, we will:
 - a. Collect internal data on the application of this policy (e.g. number of customers supported, referrals made, staff training completed)
 - b. Monitor feedback from affected customers and staff involved in delivering this policy
 - c. Conduct internal audits of our systems and procedures to ensure they are fit for purpose
 - d. Use this information to evaluate the effectiveness of the policy and identify any areas for improvement
- 1.5 The outcomes of these evaluations will inform future training, process updates, and refinements to this policy.
- 1.6 We have a number of resources set out in this Policy.

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

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

2. Purpose

- 2.1 Our objective as an energy retailer is to reduce the risk of harm to our customers who are experiencing or who have experienced family violence. We do this by:
 - a. Designing our systems and processes in a way that reduces the risk of harm;

- b. Reducing the barriers to customers who are seeking help, assistance or information under this Policy;
 - c. Adopting the measures set out in this Policy; and
 - d. Demonstrating our commitment to support customers at all levels within our business, including from senior leadership.
- 2.2 The purpose of this policy is to:
 - a. Reduce the risk of harm to our customers experiencing family violence;
 - b. Provide safe, flexible and confidential support for customers affected by family violence; and
 - c. Demonstrate our commitment to addressing family violence at all levels of our business.
- 2.3 This policy applies to both current and former small customers of Eastern Electric Pty Ltd (**EE**) who may be affected by family violence.

3. Publication and access

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

4. Scope

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

5. Your Rights

- 5.1 Our customers who are impacted by family violence have the following rights:

- a. Receive support from our employees in a respectful and supportive manner.
- b. Have your personal information handled securely, privately, and sensitively.
- c. Choose a safe method of communication of your preference. We offer a variety of communication channels, such as email, phone, and secure messaging, to suit different needs and comfort levels.
- d. Access information about external family violence support services. We will maintain an updated list of external family violence support services and make it easily accessible.
- e. Appoint an authorised representative or a support person to act on your behalf. We will implement a secure verification process for authorised representatives to ensure they are legitimate.
- f. Remove the joint account holders and, if needed, set up a new account in your name (if required). We will implement a simplified, expedited process for removing joint account holders and setting up new accounts.
- g. Receive payment assistance support, including access to the assistance under our hardship policy. We won't charge you anything to change details on your account.
- h. Avoid the need to repeatedly disclose your circumstances and receive continuity of service. If you are comfortable with us doing so, we will assign you a dedicated contact and backup contact within our organisation. You can request a change to who your contacts are at any time.
- i. Account security options: we will implement additional account security measures as set out below. These are designed to keep your account safe.

6. What we will do

6.1 In accordance with the National Energy Retail Rules (NERR):

- We will not be in breach of your customer retail contract if we are unable to meet a contractual obligation because we are complying with our obligations under Part 3A of the NERR.
- You will not be treated as being in breach of your contract if you are unable to meet a contractual requirement because you are using your preferred method of communication with us in accordance with the NERR.
- If any term of a market retail contract is inconsistent with the way this Family Violence Policy applies to you, that contract term will not apply to the extent of the inconsistency.
- We will ensure that you can continue to receive energy services under a customer retail contract in accordance with the NERR while you are being supported under this policy

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

7. Training

- 7.1 Ongoing training is provided to every person (including employees, agents and contractors) acting on our behalf who may engage with affected customers, managers of any person who may engage with affected customers and also anyone responsible for systems and processes that guide interactions with small customers. Training frequency and content will meet the requirements of the AER Statement of

Expectations on Family Violence and will be reviewed annually against current best practice, including updates to NERR rule 56A and any related regulatory guidance.

- 7.2 The purpose of the training we provide is to ensure that we comply with this policy and our obligations under relevant law, including the NERR rule 56A, and to ensure that our customers are adequately supported and protected. All training will incorporate trauma-informed care principles, ensuring staff understand the impacts of trauma and can respond in ways that promote safety, trustworthiness, choice, collaboration, and empowerment.
- 7.3 Training will cover:
- a. the nature and consequences of family violence;
 - b. the application of this policy;
 - c. how to identify affected customers using the 'Recognise, Respond, Refer' model;
 - d. how to engage appropriately and effectively with affected customers, including when there is no direct disclosure of family violence;
 - e. the impact of intersectionality, and how factors such as culture, gender, disability, language, and financial dependence may shape a customer's experience of family violence;
 - f. how staff who are not family violence specialists can engage safely and respectfully;
 - g. available referral pathways to specialist support services; and
 - h. the importance of a flexible, customer-centred approach, including the use of non-judgemental and non-victim blaming language in all communications
- 7.4 Training materials will be reviewed and updated at least once a year to ensure they remain current and effective. Feedback from customers will be considered and incorporated where relevant to improve the training content and delivery.
- 7.5 The effectiveness of our training will be assessed on the basis of feedback from staff, and where appropriate third parties, and based on industry best practice and guidance materials published by regulatory and other industry bodies.

8. How we secure your account

- 8.1 Our organisation takes our obligations regarding all of our customer's personal information seriously and we manage this in accordance with the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles*. A copy of the EE Privacy Policy is available at our website.

- 8.2 We take various steps to secure your data including:
- a. Restricting access to your accounts,
 - b. customer defined account security,
 - c. data masking and redaction, and
 - d. de-identifying correspondence.
- 8.3 These measures are applied based on your preferences or our assessment of your needs.
- 8.4 Once identified as being affected by family violence, your customer record will be flagged in our system to ensure you receive the protections under this policy. Your personal information will be stored securely and will only be accessible by staff who need it to support you. The flag will remain in place until you ask us to remove it. We may also offer additional account security measures such as a customer-defined code word, PIN identifier, or two-factor authentication to verify your identity and prevent unauthorised access to your account. We will not disclose your confidential information to any other person without your prior consent or where we are required to do so by law.
- 8.5 In accordance with NERR rule 56A(3), we will implement safe account management protocols, including: (a) ensuring that no account information, billing details, or correspondence is disclosed to a person who may pose a risk to the affected customer; (b) enabling the separation of joint accounts without requiring consent from the other account holder where family violence has been identified; and (c) ensuring that account management actions do not inadvertently alert a perpetrator to the customer's actions or whereabouts.
- 8.6 Our organisation will maintain records relating to our compliance with our obligations under the law relating to retailers and family violence. These records will be maintained for at least two years, for as long as you continue to receive assistance from us, or as long as there are any unresolved disputes.
- 8.7 Family violence records will be subject to enhanced data protection measures, including:
- a. restricted access limited to authorised family violence-trained staff only;
 - b. encryption of electronic records containing family violence disclosures;
 - c. separation of family violence records from general customer records where practicable; and
 - d. prohibition on sharing family violence information with third-party debt collectors, credit reporting agencies, or other parties without the express written consent of the affected customer, except where required by law.

9. What we will do about debts

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

10. Centrepay

- 10.1 You may request that we accept payment using Centrepay as a payment option.
- 10.2 If you are on a standard retail contract, we must accept Centrepay as a payment option.

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

11. What support is available

- 11.1 You can access support by contacting:
 - a. our customer service department through various channels such as phone, email, or in-person visit.
 - b. an independent financial counsellor, case worker or an external family violence support services to access resources and support.
- 11.2 We will ensure that we ask your preferred method of communication and will clearly record this on your account. We will communicate with you via this method of communication or, if your preferred method of communication is not practicable, you may communicate with us via SMS, WhatsApp, Messenger, Email, or by Phone. We will keep a record of the ways in which we will communicate with you.
- 11.3 To further safeguard affected customers:
 - a. We will disable automated communications such as texts, emails or letters, to prevent messages being inadvertently sent to a perpetrator.
 - b. All communications be manually reviewed before they are sent to ensure they are delivered using your preferred communication method.
 - c. We will ensure that no communication is sent to a previous address if you have provided us with a new one.

12. Supporting Documentation

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

13. External Support

- 13.1 We will advise you of external support services, including access to a free interpreter service (telephone 131 450).
- 13.2 We will also maintain a list of external support services that are published on our website.
- 13.3 We will keep this information up-to-date, ensuring that customers affected by family violence can easily access this assistance.

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

- 14.1 At any time, if you have concerns about your well-being or need support with your energy account, please do not hesitate to contact us. You can reach us via email at [REDACTED] or by phone at [REDACTED].
- 14.2 We take all your concerns and complaints seriously and will handle them in accordance with our Complaints and Dispute Resolution Policy <include link>.
- 14.3 We welcome feedback on this policy. If you have feedback on this policy please do not hesitate to contact us.
- 14.4 If you are not satisfied with the outcome of our investigation, you can also contact the state-specific Ombudsman for further assistance.
- 14.5 See below a list of state specific energy ombudsman contact details.

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

15. What external support is available

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

Service	Phone	Website	Support provided
1800 RESPECT (National)	1800 737 732 (24/7)	https://www.1800respect.org.au/	24/7 counselling, information, and referral for people impacted by family, domestic or sexual violence
Lifeline (National)	13 11 14 (24/7)	www.lifeline.org.au	24/7 crisis support and suicide prevention for people in emotional distress
Men's Referral Service (National with localised support)	1300 766 491	www.ntv.org.au	Support and referrals for men using violence, and those impacted by male family violence
13YARN (First Nations – National)	13 92 76	www.13yarn.org.au	Crisis support line for Aboriginal and Torres Strait Islander people, run by Indigenous people.
QLife (LGBTIQA+ - National)	1800 184 527 (3pm – midnight)	www.qlife.org.au	Telephone and webchat peer support for LGBTIQA+ people across Australia.
DVConnect - Queensland	1800 811 811 (Women 24/7), 1800 600 636 (Men 9am – midnight)	www.dvconnect.org	Crisis counselling, transport, safety planning and shelter referrals (QLD)
Domestic Violence Crisis Service – ACT	(02) 6280 0900 (24/7)	www.dvcs.org.au	Crisis accommodation, outreach, safety planning and support services (ACT)
Women's Safety Services – South Australia	1800 800 098 (24/7)	www.womenssafetyservices.com.au	Safety planning, accommodation and support for women and children (SA)
Family Violence Counselling and Support Service - Tasmania	1800 608 122 (24/7)	www.legalaid.tas.gov.au/family-violence	Counselling, legal advice and support for people experiencing family violence (TAS)

Annexure B7

Privacy Policy

Classification: Public

Privacy Policy

Eastern Electric (EE)

Document Information

Document Type	Policy
Jurisdiction(s)	National Energy Customer Framework (NECF)
Date Last Revised	April 2026

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Version 1.0	Initial draft	CQ
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1. General

- 1.1 Eastern Electric Pty Ltd (EE) (“**us or we**”) respect the privacy of visitors to our websites ('**Sites**'), our customers and other individuals who interact with.
- 1.2 We have created this privacy policy to explain how we collect, store, use and disclose personal information.
- 1.3 Access to our privacy policy is free. If you would like us to post you a copy of our privacy policy, or have any questions about it or its contents, please call us on [REDACTED] or email us at [REDACTED].
- 1.4 The *Privacy Act 1988* (Cth) ('**Privacy Act**') includes thirteen (13) Australian Privacy Principles ('**APPs**'). The APPs regulate the way many companies collect, use, hold and disclose personal information.
- 1.5 We have adopted an approach that is consistent with the Privacy Act, the APP's and the APP guidelines.
- 1.6 Our practices and internal policies are consistent with this privacy policy and our staff are required to ensure compliance as a condition of their employment. In any third-party contracts we enter into, there is a duty to maintain personal information in accordance with this privacy policy and in a manner consistent with the Privacy Act.
- 1.7 From time to time we will update this privacy policy. If we do so we will update the version number. Any changes to this privacy policy will be consistent with our legal obligations.

2. How and why we collect personal information

- 2.1 The Company collects personal information in a number of ways. The most common ways we collect personal information include:
 - a. **From application forms (online or hard copy or completed via telephone):** when individuals apply to become customers or subscribe to marketing or communications lists, for the purpose of providing news, information, offers and other services.
 - b. **From order forms (online or hard copy or via telephone):** when goods and services are ordered by distributors and retailers: for the purpose of fulfilling the order and delivering the goods, and to maintain our relationship with the individual concerned.
 - c. **From telephone, email, written and in-person enquires:** for the purposes of responding to enquires.

- d. **Business cards:** when you enter into transactions with us or otherwise interact with us in a business context including from your business card.
 - e. **From online or hard copy surveys:** for the purpose of reviewing and analysing the results and following up on results.
 - f. **Any messages or comments submitted to us via the Site:** which may include personal information such as your name, email address and telephone number.
 - g. **From public registers including social networks such as LinkedIn:** if you have made this information available, for the purpose of obtaining your contact details.
 - h. **From Sites through automatic processes such as cookies:** Cookies are used to better understand users and improve the layout and functionality of our Sites by collecting information such as date, time and duration of visits and which pages are most commonly accessed. This tracking is conducted in such a way as to ensure the anonymity of visitors to Sites. While cookies may identify the computer, it should not identify the individual. With most internet browsers, users can erase cookies from their computer's hard drive, block all cookies or receive a warning before a cookie is stored. However, some parts of this Site may not function fully for users that disallow cookies.
- 2.2 Our Sites may collect other information that may or may not be personal information. For each visitor to the Site, our server automatically recognises and stores the individual's "IP address" (e.g. the domain name or Internet Protocol address), the type of Internet browser being used, the address of the site that "referred" the individual to our website and clickstream data. If this information cannot be used or combined with other data to identify you, it will not be personal information.
- 2.3 We generally collect personal information for the purpose of providing you with any goods or services that you request, to update our Sites, to improve the services or goods that we provide and to develop our business.

3. What personal information is collected

- 3.1 We aim to only collect personal information that is necessary to fulfil the purpose for which you have disclosed it, or as required by law.
- 3.2 You will typically be asked to provide contact information (such as your name, telephone number, postal address and email address). You may also be asked for demographic information (such as your age and gender) and/or profile data.

- 3.3 In some instances, we may need to ask you for additional information necessary to provide you with the goods or services you have requested. When we ask you for further information in addition to what you provide to us initially, we will tell you why we are collecting that information.
- 3.4 We aim to only collect information that is absolutely necessary to provide you with any service you have requested. If you would prefer to remain anonymous, we are happy to still deal with you, provided that we don't need to know who you are. Instances where this may be possible include where you are providing us with anonymous feedback that does not require a response.
- 3.5 We generally do not collect sensitive personal information unless it is reasonably necessary, such as health information for life support equipment registration, concession card details for rebates, or information required to assess hardship applications. Where we do collect sensitive information, we will obtain your consent unless a permitted general situation applies under the Privacy Act.

4. Electronic communications

- 4.1 In some instances, where you have provided consent, or consent is deemed to have been provided or conferred (in compliance with the APPs) we may use your personal information for the purpose of sending you marketing communications including by electronic means such as email, SMS, MMS for an unlimited period. You may opt-out of receiving such messages at any time provided such messages are sent by us. We will give you the opportunity to opt-out within the message that we send to you. You may also opt-out by contacting us (using the details provided below).
- 4.2 EE's electronic communications practices comply with the Telecommunications Act 1997 (Cth), the Do Not Call Register Act 2006 (Cth), and the Spam Act 2003 (Cth). EE will not send commercial electronic messages without consent as required by these Acts.
- 4.3 In some instances, where you have provided consent, or consent is deemed to have been provided or conferred (in compliance with the APPs) we may also send you electronic updates including via email, SMS, MMS for an unlimited relating to products or services you have ordered, used or enquired about, to keep you informed of changes to the Site, and the products or services offered via the Site or from other production companies. You may opt-out of receiving such messages at any time provided such messages are sent by us. We will give you the opportunity to opt-out

within the message that we send to you. You may also opt-out by contacting us (using the details provided below).

5. Storage of personal information

- 5.1 Any information we collect about you will be kept securely by us unless an event beyond our control disrupts the measures we have in place. We use a range of measures to ensure the security of the data we keep and to prevent unauthorised access, destruction, use, modification or disclosure. We have procedures in place with regards to staff access to personal information and ensure that only those staff who need to know have access to your information.
- 5.2 We will only store personal information for so long as it is required either to fulfil the purpose for which it was collected or to fulfil our obligations at law. We will conduct reviews, at least every two years, of the personal information we hold and destroy or de-identify information no longer required.

6. Disclosure of personal information

- 6.1 Generally, personal information will not be disclosed to individuals or organisations outside of EE without your prior consent. However, in the circumstances described below, personal information may be disclosed to:
 - a. **Essential service providers:** There may be other companies that we rely on to provide goods or services to you. We may be required to provide your personal information to these companies to ensure that we can deliver goods or services to you.
 - b. **Law enforcement or government bodies:** There are exceptions under the Privacy Act with regards to the provision of personal information to law enforcement or government bodies. When a legitimate request is sent to us by a law enforcement or government body we will comply with that request and may provide personal information about you without your consent.
 - c. **Companies related to us or who take control of part or all of our business:** In providing personal information to us you will need to be aware of the possibility that, in future, another company may take control of part or all of our business. In that case, your personal information will be provided to that company.

- 6.2 If we disclose personal information to an overseas recipient, we will take reasonable steps to ensure the overseas recipient handles the information in accordance with the APPs, as required by APP 8. We will inform you if your personal information is likely to be disclosed to overseas recipients and, where practicable, the countries in which those recipients are likely to be located.
- 6.3 If we disclose personal information to a third party under outsourcing or contracting arrangements (a service provider), we will take steps to ensure that they have:
- a. Signed a binding agreement;
 - b. Handle the personal information in a manner consistent with the APPs (regardless of whether they are a small business, or would otherwise be exempt from the Privacy Act;
 - c. Only use the personal information in order to provide specific services or to perform the specific functions required; and
 - d. Store the personal information securely, and only for as long as is necessary to provide the required services to perform the required functions.

7. Access to personal information

- 7.1 Under the Privacy Act, you have the right to seek access and to update or correct the personal information that we hold about you. If you wish to exercise your right under the Privacy Act to seek access to the personal information held for you, you should make the request in writing (to the address specified below).
- 7.2 Ordinarily we will not charge for providing access/copies of personal information we hold about you, and will generally respond to access requests of this type within 30 days. If we anticipate there being a fee (for the time we spend locating and compiling the information you have asked for) we will provide you with an estimate before proceeding. If a fee is payable it will be based on an hourly rate plus the cost of photocopying or other out of pocket expenses. For legal and administrative reasons, we may also store records containing personal information in archives. Access to these historical records may result in a charge being incurred (an estimate will be provided to you prior). Due to the nature of archive, requests for access to historical records may take longer to process than with current records.
- 7.3 You may correct the personal information we hold about you at any time, you should make the request in writing (to the address specified below). We do not charge a fee to correct personal information held.

- 7.4 On review of your request, if we agree that the personal information held is not accurate, complete and up to date, it will be corrected by the appropriate person. If we do not agree, you will be provided with the reason(s) for the views and the opportunity to make a statement of your view and have it included with the information held.

8. Complaints

- 8.1 You have a right to complain to us if you are concerned about your privacy, how we have dealt with your personal information or in relation to the Privacy Act.
- 8.2 If you are concerned about how we have dealt with your personal information you should first contact us (using the details set out below). We will endeavour to send you a written response within 10 business days.
- 8.3 If you are not satisfied with the way we have managed or attempted to resolve your complaint you may complain to the Office of the Australian Information Commissioner by calling them on 1300 363 992, via their website at www.oaic.gov.au or by mail to the Office of the Australian Information Commissioner, GPO Box 5218 Sydney NSW 2001.

9. Links to third-party websites

- 9.1 Our Sites contain links to third party websites for individual's convenience and information. Individuals should be aware that when they access a third-party website, we are not responsible for the privacy practices or policies of that third party and will not be liable for any use or disclosure your personal information by any third party to whom your information is sent. We suggest that you review the privacy policy of each website you visit.

10. Notifiable data breaches

- 10.1 In the event of a data breach that is likely to result in serious harm to any individual whose personal information is involved (an eligible data breach), we will, where required to do so, notify the affected individuals and the Office of the Australian Information Commissioner (OAIC) as soon as practicable, in accordance with Part IIIC of the Privacy Act 1988 (Cth) (the Notifiable Data Breaches scheme). We will take reasonable steps to contain the breach and assess the risks of serious harm to individuals. Any notification will include a description of the data breach, the kinds of

information involved, and recommendations about the steps individuals should take in response.

11. Acceptance of this policy

- 11.1 By using the Sites, you signify your acceptance of this privacy policy. If you do not agree with this policy, please do not use our Sites or provide us with your personal information. The EE reserves the right to modify, alter or otherwise update this policy at any time. Should the EE modify, alter or otherwise update this policy, it will prominently post notice(s) of the changes on the Sites covered by this privacy policy.

12. Contact details

Company Names: Eastern Electric Pty Ltd

Telephone: [REDACTED]

Email: [REDACTED]

Mailing address: [REDACTED]

Annexure B12

Third Party Selection, Management and Oversight Policy

Classification: Public

Third Party Selection, Management and Oversight Policy

Eastern Electric Pty Ltd

Document Information

Document Type	Policy
Jurisdiction(s)	National Energy Customer Framework (NECF)
Date Last Revised	March 2026

Version Control

Version	Amendment	Author and Date
Version 1.0	Initial draft	CQ/ April 2026
Version 1.1	Reviewed	JMO April 2026

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1. Introduction

- 1.1 Eastern Electric Pty Ltd (**EE**) is a solar and storage provider that utilises a 'Business Power Plant' to offer energy savings to small to medium enterprise customers.
- 1.2 EE relies on selected third parties in its business operations to supplement its internal resourcing, to fill gaps in existing capability, and to leverage external experience. EE's current third-party arrangements include compliance support (Compliance Quarter), legal and compliance support (Adarite), equipment distribution [REDACTED], recruitment [REDACTED], IT and cybersecurity [REDACTED], Energy Markets support (Energy Action) and shared services with its parent company [REDACTED].
- 1.3 EE wants to ensure that all third-party vendors engaged to provide services are aware of, and comply with, EE's obligations. This policy is aligned with AS ISO 37301:2021 (Compliance management systems) clause 8.6, which requires organisations to address compliance risks arising from third-party relationships.
- 1.4 This policy consolidates EE's approach to third-party selection, management and oversight into a single document, covering the full third-party lifecycle from identification of need through to termination.
- 1.5 This policy applies to all categories of third-party arrangements, including outsourced operational services, contracted consultants, technology and software providers, metering service providers, and shared services arrangements with related entities. The level of oversight applied to each engagement will be proportionate to the risk and materiality of the services provided.

2. Scope

- 2.1 This policy applies to:
- All EE departments that may need to engage a third-party supplier of services or software, including IT, Operations, Sales, Customer Service, and Administration;
 - All EE activities, including entities over which EE has direct ownership, management or financial control; and
 - All other bodies including contractors and related entities of EE involved in and with responsibility for contributing towards EE's objectives and responsibilities.
- 2.2 Where the proposed engagement involves the outsourcing of a function that is subject to regulatory obligations under the National Energy Retail Law or National Energy Retail Rules, the selection process must include an assessment of the prospective supplier's capacity to support EE's compliance with those obligations.

3. Roles and Responsibilities

- 3.1 The following positions are responsible for third-party selection, management and oversight within EE:
- Managing Director - approves the Annual Third-Party Management Plan, evaluates requests for new third-party engagements, approves contracts, and has overall accountability for third-party risk;

- b. Head of Compliance - acts as Head of Compliance for the purposes of this policy, develops and maintains the List of Compliance Obligations for each third-party engagement, monitors third-party compliance, conducts spot audits, reports compliance breaches to the Managing Director and regulatory authorities, and coordinates the escalation process;
- c. Director, Head of Operations (George Horlin-Smith) - reviews third-party management reports, oversees implementation of remedial actions, and approves termination decisions;
- d. Lead Software Engineer (Kenrick Everett) - conducts market research and technical evaluation of technology and software suppliers, develops requests for proposal, evaluates proposals, negotiates contracts with technology suppliers, and manages onboarding of technology providers;
- e. Renewables Engineer and Energy Adviser (Jack Anstey) - provides subject matter expertise for evaluation and oversight of equipment suppliers, installation service providers, and energy services contractors.

4. Third-Party Risk Management

- 4.1 EE has implemented a third-party risk management framework as part of its overall Risk Management Policy. EE's Risk Register identifies the following third-party risks:
 - a. Third-party service disruptions (Risk Register Item 35);
 - b. Third-party data security and privacy breaches (Risk Register Item 36);
 - c. Third-party non-compliance with laws and regulations (Risk Register Item 37);
 - d. Third-party performance issues (Risk Register Item 38); and
 - e. Third-party financial viability (Risk Register Item 39).
- 4.2 The purpose of the risk management framework is to ensure that before entering into a contract with a third-party vendor for the supply of services, a sufficient due diligence process has been undertaken.
- 4.3 The due diligence process must include a formal risk assessment of the third party, evaluating their financial stability, regulatory compliance history, operational capability, information security practices, and any prior enforcement actions by the AER or other regulatory bodies. The assessment must be documented and approved by the Head of Compliance before the engagement proceeds.

5. Selection of Third-Party Suppliers

- 5.1 EE will engage with third parties from time to time for reasons including: to supplement its internal resourcing, to fill any gaps in existing capability, and to leverage external experience.
- 5.2 In selecting third parties, EE will first identify the need and define it, then determine what attributes or experience are required from a third party and then look for suitable third parties to fulfil the need identified.

Step 1: Identification of Need
- 5.3 The department identifies a need for a third-party supplier of services or software and submits a request to the Managing Director.

Step 2: Evaluation of Need
- 5.4 The Managing Director will evaluate the necessity of the request and potential alternatives. If the request is approved, the selection process begins.

Step 3: Planning

- 5.5 Before entering into a third-party relationship, the Managing Director and relevant subject matter experts will develop a plan to manage the relationship. The plan will be commensurate with the level of risk and complexity of the third-party relationship and will consider the following:
- a. Assessment of the inherent risk in the activity to be undertaken by the third party;
 - b. The strategic purposes (e.g. reduce costs, leverage specialised expertise or technology, augment resources, expand or enhance operations), legal and compliance aspects, and inherent risks associated with using third parties, and how the arrangement aligns with EE's overall strategic goals, objectives, and risk appetite;
 - c. The complexity of the arrangement, such as the volume of activity, potential for subcontractors, the technology needed, and the likely degree of support required;
 - d. Whether the potential financial benefits outweigh the estimated costs to control the risks, including estimated direct contractual costs and indirect costs to augment or alter EE's processes, systems, or staffing;
 - e. The nature of customer interaction with the third party and potential impact on EE's customers, including access to or use of customers' confidential information, joint marketing arrangements, and handling of customer complaints;
 - f. The extent to which the activities are subject to specific laws and regulations (e.g. Privacy Act, Competition and Consumer Law, Do Not Call Register requirements, National Energy Retail Law and Rules); and
 - g. How EE will select, assess, and oversee the third party, including monitoring compliance with the contract.
- 5.6 The plan will be presented to and approved by the Managing Director.

Step 4: Market Research

- 5.7 The Lead Software Engineer (for technology and software suppliers) or relevant subject matter expert (for other suppliers) will conduct market research to identify potential suppliers that meet the needs identified.

Step 5: Request for Proposal (RFP)

- 5.8 The Lead Software Engineer or relevant subject matter expert will develop an RFP and distribute it to potential suppliers.

Step 6: Due Diligence and Proposal Evaluation

- 5.9 Before entering into a third-party relationship, EE will undertake due diligence to ensure that the third party's systems and policies align with the obligations which apply to an authorised energy retailer under the Privacy Act, Competition and Consumer Law, Do Not Call Register requirements, and National Energy Retail Law and Rules.
- 5.10 The due diligence will consider the following aspects of the third-party business:
- a. That the strategies and goals of the third party do not conflict with those of EE;
 - b. That all necessary licences have been obtained;
 - c. That there is sufficient expertise, processes, and controls to enable EE to remain compliant with Australian laws and regulations;

- d. That an ASIC and ACCC check has been undertaken to ensure the third party is not in breach of any statutory obligations;
 - e. That a search has been undertaken to ensure that the third party is not subject to any financial distress, including having entered into a voluntary administration or having an outstanding statutory demand or winding up application on foot;
 - f. That the business experience and reputation of the third party is sufficient to ensure it has the expertise to provide the service;
 - g. That the risk management and compliance policies in operation comply with all Australian laws and regulations, in particular the obligations imposed on an authorised energy retailer;
 - h. That there are adequate systems in place to protect the privacy of customers;
 - i. That the technology and systems which will be used by the third party are suitable for the functions to be undertaken;
 - j. That the incident reporting processes in place are compliant with the requirements for notification under the National Energy Retail Law and Rules;
 - k. That the training programs in place can be adapted to incorporate necessary training required under the National Energy Retail Law and Rules;
 - l. That the supplier maintains appropriate information security controls, including data encryption, access management, and incident response procedures;
 - m. That the supplier has adequate business continuity and disaster recovery arrangements;
 - n. That the proposed pricing is competitive and represents value for money; and
 - o. That the third party has all necessary insurance policies in place.
- 5.11 Evaluation criteria should be weighted according to the nature and risk profile of the engagement. The results of due diligence and proposal evaluation must be documented.

Step 7: Supplier Selection

- 5.12 The Lead Software Engineer or relevant subject matter expert will select the most suitable supplier based on the evaluation results and notify the requesting department. If no suitable supplier is found, the requesting department will be informed that the engagement will not proceed.

6. Contract Negotiations

- 6.1 Once a third party has been selected and satisfactory due diligence has been conducted, the Managing Director and relevant subject matter expert will negotiate a contract with the third party.
- 6.2 The contract should address the following:
- a. Nature and scope of the arrangement;
 - b. Regular compliance monitoring;
 - c. Performance measures or benchmarks;
 - d. Responsibilities for providing, receiving and retaining information;
 - e. Responsibility for compliance with applicable laws and regulations;
 - f. Express obligations requiring the third party to comply with all applicable provisions of the National Energy Retail Law, National Energy Retail Rules, and any conditions of EE's retailer authorisation;

- g. Confidentiality;
 - h. Dispute resolution;
 - i. Limits on liability;
 - j. Default and termination;
 - k. Customer complaints and hardship policy;
 - l. AER audits and provision of information;
 - m. Audit rights permitting EE (or its authorised representatives) to access the third party's premises, systems, records and personnel for the purpose of verifying compliance. Audit rights must extend to sub-contractors engaged by the third party;
 - n. Duration; and
 - o. Fee for service.
- 6.3 The contract must be approved by the Managing Director.

7. Onboarding and Transition

- 7.1 Following contract execution, an onboarding process must be completed before the supplier commences delivery of services. This includes:
- a. Providing the supplier with relevant EE policies and procedures, including the List of Compliance Obligations applicable to the engagement;
 - b. Establishing communication protocols and escalation contacts;
 - c. Confirming data handling and privacy requirements;
 - d. Setting up access to any EE systems required for the engagement; and
 - e. Obtaining written acknowledgment from the third party that they have received and understood the compliance obligations applicable to their engagement.

8. Identification of Compliance Issues

- 8.1 All third-party vendors will be required to notify the Head of Compliance of any compliance breaches which occur in the course of providing services.
- 8.2 The Head of Compliance will compile a List of Compliance Obligations which are relevant to each type of third-party vendor services contracted. This list will be provided to the third-party vendor at the time of entering into the contract.
- 8.3 The List of Compliance Obligations may be updated from time to time when regulatory or legislative changes occur.
- 8.4 All third-party vendors will be required to provide written acknowledgment of receipt whenever an amended List of Compliance Obligations is sent to them.
- 8.5 The Head of Compliance will keep a record of the various lists of Compliance Obligations and record the acknowledgments.

9. Ongoing Monitoring and Oversight

- 9.1 EE will continue to monitor the provision of services by third parties to ensure compliance with contractual obligations and the National Energy Retail Law and Rules.

- 9.2 The Head of Compliance is responsible for ongoing monitoring of the performance of third-party vendors in relation to compliance. The following supervisory controls will be established:
- a. Regular performance reviews: The Head of Compliance will review the work of third parties against predefined KPIs and service level agreements. The frequency of review will be proportionate to the risk profile of the engagement;
 - b. Periodic audits: The Head of Compliance will conduct risk-based audits of third-party engagements. Audits will evaluate compliance, quality of work, data privacy, and information security;
 - c. Clear performance standards: Performance standards and KPIs will be established for each third-party contract based on the scope of work;
 - d. Spot audits: From time to time the Head of Compliance will conduct spot audits to ensure that compliance policies are being adhered to; and
 - e. Contract compliance reviews: Reviews will assess third-party compliance with all contractual terms and conditions. Each supplier engagement must be reviewed prior to any contract renewal or extension.
- 9.3 In addition to ongoing monitoring, EE must conduct a comprehensive reassessment of each third-party arrangement at least every two years, or more frequently where there has been a material change in the third party's circumstances, ownership, or risk profile. The reassessment must evaluate whether the third party continues to meet EE's compliance requirements and whether the contractual terms remain fit for purpose.

10. Escalation and Breach Notification

- 10.1 Any breach of obligations by a third party must be immediately reported by the Head of Compliance to the Managing Director.
- 10.2 Where a third party fails to meet its contractual or regulatory obligations, the following escalation process applies:
- a. Initial notification: The third party is notified in writing of the identified non-compliance or performance shortfall and given a reasonable period to rectify the issue;
 - b. Formal review: If the issue is not resolved within the specified period, a formal review meeting is convened with the third party to discuss remediation actions and revised timelines;
 - c. Contract remedies: If the third party continues to fail to meet its obligations, EE may exercise contractual remedies including issuing a formal breach notice, withholding payments, or terminating the engagement in accordance with the terms of the contract; and
 - d. Regulatory notification: Where a third party's non-compliance has resulted in, or is likely to result in, a breach of EE's obligations under the National Energy Retail Law or Rules, the Head of Compliance will take all necessary steps to notify the AER within the timeframes prescribed by the AER's Compliance Procedures and Guidelines.
- 10.3 Upon being notified of a compliance breach from a third-party vendor, the Head of Compliance will immediately assess whether the breach needs to be reported to a regulatory authority.

- 10.4 The Head of Compliance will arrange a meeting of the Compliance Committee to consider the breach and what remedial action should be taken. The Compliance Committee will prepare a report for the Managing Director which details the circumstances of the breach and what remedial steps are required. This may include seeking legal advice as to whether the third-party vendor contract should be terminated.
- 10.5 The Head of Compliance will present the report to the Managing Director and the Managing Director must agree to the action. The Head of Compliance will be responsible for ensuring that the relevant course of action is undertaken and for reporting to the Managing Director on the progress of the course of action and any further actions which may be required.

11. Review of Third-Party Vendor Procedures

- 11.1 If the compliance breach notified by the third-party vendor is of a serious nature then the Head of Compliance will be responsible for ensuring that the relevant third-party vendor policies and procedures are updated or amended to ensure that the breach does not re-occur.
- 11.2 The Head of Compliance will be required to report to the Managing Director that this process has been undertaken and when it is completed.

12. Termination

- 12.1 EE may terminate the contract with a third party in accordance with the individual contract terms.
- 12.2 Prior to termination EE will implement a plan to ensure a smooth transition of the services being undertaken by the third party.
- 12.3 EE may engage a new third party to provide the services or determine to provide the service in-house.
- 12.4 In making this decision, the Managing Director must ensure that customers' confidential information is protected at all times.

13. Documentation and Reporting

- 13.1 EE will document and report on its third-party management process and specific arrangements throughout their lifecycle.
- 13.2 The Head of Compliance will be responsible for ensuring that there are documentary records of the compliance history of each third-party vendor.
- 13.3 All interactions with third parties, including meeting minutes, performance reviews, audit reports, and correspondence relating to compliance matters, must be documented and retained in accordance with EE's record keeping obligations. Documentation should be maintained for a minimum period of seven years, or as otherwise required by applicable legislation.
- 13.4 A register of all third-party engagements must be maintained, recording the nature of the engagement, the responsible internal contact, contract start and end dates, and a summary of any compliance issues identified during the engagement.
- 13.5 Proper documentation and reporting facilitates accountability, monitoring, and risk management associated with third parties and will include:

- a. A current inventory of all third-party relationships;
 - b. Approved plans for the use of third-party relationships;
 - c. Due diligence results, findings, and recommendations;
 - d. Analysis of costs associated with each activity or third-party relationship;
 - e. Executed contracts;
 - f. Regular risk management and performance reports required and received from the third party (e.g. audit reports, security reviews, and reports indicating compliance with service-level agreements);
 - g. Regular reports to the Managing Director on the results of internal control testing and ongoing monitoring of third parties; and
 - h. Regular reports to the Managing Director on the results of independent reviews of EE's overall third-party risk management process.
- 13.6 The compliance history of each third-party vendor will be reviewed annually by the Head of Compliance and a report presented to the Managing Director.

14. Measures of Success

- 14.1 The success of EE's third-party selection, management and oversight will be measured by the following key performance indicators:
- a. The number of successful engagements with third-party suppliers;
 - b. The satisfaction of departments with the services or software received;
 - c. The reduction in costs or increase in efficiency due to third-party engagements;
 - d. The time taken from identification of need to engagement of the supplier;
 - e. The rate at which third parties comply with contractual obligations and regulatory standards (compliance rate);
 - f. The time taken to resolve any issues that arise during the course of work (issue resolution time);
 - g. Audit results from periodic audits of third-party engagements;
 - h. Contract renewal rate, indicating satisfactory performance and value;
 - i. The absence of regulatory compliance incidents attributable to third-party conduct (target: zero incidents); and
 - j. Adherence to this policy for all third-party engagements, as assessed through periodic internal review.

Annexure B24

Compliance Committee Charter

Classification: Public

Compliance Committee Charter

Eastern Electric Pty Ltd

Document Information

Document Type	Charter
Jurisdiction(s)	National Energy Customer Framework (NECF)
Date Last Revised	April 2026

Version	Amendment	Author and Date
Version 1.0	Initial draft	CQ, April 2026
Version 1.1	Reviewed	JMO April 2026

Introduction

This Charter sets out the role, composition, authority and operating procedures of the Compliance Committee (the Committee) of Eastern Electric Pty Ltd (EE). It should be read together with EE's Compliance Policy (Annexure B2) and Risk Management Policy (Annexure B8).

Purpose

The Committee oversees the implementation of EE's compliance program, the identification of new and changed regulatory obligations, and the management of compliance breaches.

The Committee works in tandem with the Risk Committee (Annexure B25). The Committee is responsible for compliance-specific oversight; the Risk Committee is responsible for risk oversight generally. Matters with both risk and compliance dimensions are co-ordinated between the two Committees.

Scope

The Committee's scope covers compliance with all regulatory obligations that impact, or have the potential to impact, EE's operations, including:

- National Energy Retail Law, National Energy Retail Regulations and National Energy Retail Rules;
- AER guidelines, including the Customer Hardship Policy Guideline and Better Bills Guideline;
- Rule 76A of the National Energy Retail Rules (family violence);
- Ombudsman scheme rules and requirements;
- Privacy Act 1988 and Australian Privacy Principles;
- Competition and Consumer Act 2010 (including the Australian Consumer Law);
- Workplace health and safety legislation; and
- Any other Applicable Law identified in EE's Obligations Register (Annexure B20).

Composition

The Committee comprises the following members:

Member	Role at Eastern Electric	Committee role
Jordan Miller-Owen	Managing Director	Member
Varun P. Singh	Head of Compliance	Chair
Kenrick Everett	Lead Engineer	Member
George Horlin-Smith	Director, Head of Operations	Advisor
Graeme Dennis	Contractor - Compliance & Risk	Advisor

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The Managing Director appoints members of the Committee. A member ceases to be a member on resignation, removal by the Managing Director, or cessation of their substantive EE role. The Managing Director will fill any vacancy within a reasonable time.

The quorum for a meeting is a majority of members, which must include the Chair or their nominee.

Responsibilities

- Oversee the implementation of the CMS through the development, approval and operationalisation of policies, procedures and training programs.
- Review and approve EE's Obligations Register and ensure it reflects current Applicable Law and industry obligations.
- Review compliance monitoring reports, internal audit reports and external assurance reports, and track the implementation of recommendations.
- Consider compliance breaches notified under EE's Breach Notification Form (Annexure B23), assess materiality, and direct the Head of Compliance on investigation and remediation.
- Recommend to the Managing Director the notification of material breaches to the Australian Energy Regulator and other regulators in accordance with applicable reporting obligations.
- Oversee staff compliance training programs, including induction, annual refreshers and role-specific training.
- Approve policy changes within authority delegated by the Managing Director and recommend material changes to the Managing Director for approval.
- Review the performance and continuing suitability of third parties supporting compliance functions, in conjunction with the Third Party Selection, Management and Oversight Policy (Annexure B12).

Authority

The Committee is authorised by the Managing Director to investigate any compliance matter within its scope. It has unrestricted access to EE records, personnel and third party service providers.

The Committee may commission external compliance advice, legal advice or independent reviews at EE's expense where necessary to discharge its responsibilities.

The Committee may direct remediation action for compliance breaches within its delegated authority. Breaches assessed as material must be escalated to the Managing Director for approval of the remediation plan and regulator notification.

Meetings

The Committee meets at least monthly, with additional meetings convened at the request of the Chair or any two members.

Meetings may be held in person or by electronic means. The Chair may invite other EE officers, internal or external auditors, or external advisers to attend meetings.

An agenda is circulated at least two business days before each meeting. Minutes are prepared by the Head of Compliance (or nominee) and approved at the following meeting.

Reporting

The Managing Director's representative reports the outcomes of each Committee meeting to the Managing Director at the next management meeting and at least quarterly provides a comprehensive compliance report covering: the current state of compliance against the Obligations Register, open breaches, remediation progress, hardship and family violence outcomes, complaints data, training completion, and emerging regulatory change.

Material compliance breaches, enforcement action, or matters requiring immediate Managing Director attention are escalated to the Managing Director without waiting for the next scheduled meeting.

Conflicts of Interest

Members must declare any actual, potential or perceived conflict of interest at the commencement of each meeting and in accordance with EE's Conflict of Interest Policy (Annexure B11). A conflicted member must not participate in the discussion or decision on the relevant matter unless the Committee resolves otherwise.

Records and Review

The Head of Compliance maintains records of Committee agendas, papers, minutes and decisions for at least seven years. This Charter is reviewed at least annually and any proposed amendment is submitted to the Managing Director for approval.

Annexure B25

Risk Committee Charter

Classification: Public

Risk Committee Charter

Eastern Electric Pty Ltd

Document Information

Document Type	Charter
Jurisdiction(s)	National Energy Customer Framework (NECF)
Date Last Revised	April 2026

Version	Amendment	Author and Date
Version 1.0	Initial draft	CQ, April 2026
Version 1.1	Reviewed	JMO April 2026

Introduction

This Charter sets out the role, composition, authority and operating procedures of the Risk Committee (the Committee) of Eastern Electric Pty Ltd (EE). It should be read together with EE's Compliance Policy (Annexure B2) and Risk Management Policy (Annexure B8).

Purpose

The Committee oversees the identification, assessment, monitoring and treatment of all material risks to EE, including operational, strategic, financial, compliance, technology, cybersecurity, information security, supplier, health and safety, and environmental risks.

The Committee operates within the risk appetite and tolerance levels approved by the Managing Director and set out in EE's Risk Appetite Statement (Annexure B19) and Risk Management Policy (Annexure B8).

Scope

The Committee's scope covers all risks faced by EE, including but not limited to: operational risk; strategic risk; financial risk; compliance risk; technology and cybersecurity risk; information security risk; supplier risk; health and safety risk; and environmental risk.

Composition

The Committee comprises the following members:

Member	Role at Eastern Electric	Committee role
Jordan Miller-Owen	Managing Director	Chair
Varun P. Singh	Head of Compliance	Member
Kenrick Everett	Lead Engineer	Member
George Horlin-Smith	Director, Head of Operations	Advisor
Dave Harvey	Advisor - Wholesale Energy Markets	Advisor

The Managing Director appoints members of the Committee. A member ceases to be a member on resignation, removal by the Managing Director, or cessation of their substantive EE role. The Managing Director will fill any vacancy within a reasonable time.

The quorum for a meeting is a majority of members, which must include the Chair or their nominee.

Responsibilities

- Review and recommend to the Managing Director for approval EE's Risk Management Policy, Risk Appetite Statement and supporting procedures, including proposed changes.

- Maintain oversight of the Risk Register (Annexure B9) and ensure each risk has a named owner, controls, a residual risk rating and a review date.
- Review monthly risk dashboards covering the top operational, compliance, financial, wholesale, cybersecurity and supplier risks, and track progress on risk treatments.
- Oversee the Wholesale Risk Management Strategy (Annexure B13), including hedging strategy, counterparty exposure, AEMO prudential exposure and compliance with the Risk Appetite Statement.
- Review material incidents and near misses, root cause analyses, remediation plans and lessons learned.
- Monitor emerging risks arising from regulatory change, market conditions, technology deployment, customer acquisition variability and supply chain dependencies.
- Review the adequacy of EE's insurances, business continuity and disaster recovery arrangements at least annually.
- Escalate matters beyond the Committee's authority to the Managing Director for decision.

Authority

The Committee is authorised by the Managing Director to investigate any matter within its scope. It has unrestricted access to EE records, personnel and third party service providers.

The Committee may commission external expert advice at EE's expense where necessary to discharge its responsibilities.

The Committee may approve risk treatments within the Managing Director-approved risk appetite. Any treatment that would result in EE operating outside the Risk Appetite Statement, or that commits EE above financial thresholds set by the Managing Director from time to time, must be referred to the Managing Director for approval.

Meetings

The Committee meets at least monthly, with additional meetings convened at the request of the Chair or any two members.

Meetings may be held in person or by electronic means. The Chair may invite other EE officers, internal or external auditors, or external advisers to attend meetings.

An agenda is circulated at least two business days before each meeting. Minutes are prepared by the Head of Compliance (or nominee) and approved at the following meeting.

Reporting

The Chair reports the outcomes of each meeting to the Managing Director and at least quarterly provides a comprehensive risk report covering the current risk profile, status of risk treatments, material incidents and the effectiveness of the risk management framework.

The Head of Compliance reports monthly to the Committee on compliance-related risks identified through the Compliance Management System. The outputs of the Risk Committee also inform the agenda of the Compliance Committee (Annexure B24).

Conflicts of Interest

Members must declare any actual, potential or perceived conflict of interest at the commencement of each meeting and in accordance with EE's Conflict of Interest Policy (Annexure B11). A conflicted member must not participate in the discussion or decision on the relevant matter unless the Committee resolves otherwise.

Records and Review

The Head of Compliance maintains records of Committee agendas, papers, minutes and decisions for at least seven years. This Charter is reviewed at least annually and any proposed amendment is submitted to the Managing Director for approval.

Annexure D1

Criterion 5 Declaration · Financial

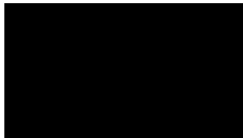
Classification: Public

Annexure D1 Criterion 5 Declaration (Financial)

09 April 2026

I, Jordan Miller-Owen of [REDACTED] being Chief Executive Officer of Eastern Electric Pty Ltd, declare that Eastern Electric Pty Ltd is a going concern and I am unaware of any factor that would impede Eastern Electric Pty Ltd's ability to finance its energy retail activities under the authorisation for the next 12 months.

Yours truly,
Jordan Miller-Owen

A black rectangular box redacting the signature of Jordan Miller-Owen.

09 April 2026

Annexure D2

Criterion 6 Declaration · Financial

Classification: Public

Private and Confidential

To whom it may concern

9 April 2026

Dear Sir / Madam

Eastern Electric Pty Ltd

We act as accountant and tax agent for Eastern Electric Pty Ltd (EEPL).

We advise that to the best of our knowledge:

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

If you have any questions, please contact me on [REDACTED]

Yours sincerely,

[REDACTED]
Laurie Madigan

Annexure D3

Criterion 1 Declaration · Suitability

Classification: Public

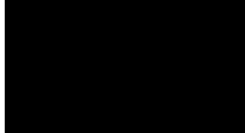
Annexure D3 Criterion 1 Declaration - Suitability

09 April 2026

I, Jordan Miller-Owen of [REDACTED] being Chief Executive Officer of Eastern Electric Pty Ltd, declare that Eastern Electric Pty Ltd, Eastern Electric Pty Ltd's associates, any other business where, Eastern Electric Pty Ltd's officers have held an officer position and any other entity that exerts control over Eastern Electric Pty Ltd has not had:

- Any material failure to comply with regulatory requirements, laws or other obligations over the previous 10 years, including infringement notices or other enforcement action (including voluntary administrative undertakings) being taken by a regulatory body.
- Any previously revoked authorisations, authorities or licences held in any industry.
- Any failed authorisation, authority, or licence applications in any industry.
- Any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry.
- Any situation where Eastern Electric Pty Ltd or an associate of Eastern Electric 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.

Yours truly,
Jordan Miller-Owen

A black rectangular box redacting the signature of Jordan Miller-Owen.

09 April 2026

Annexure D4

Criterion 2 Declaration · Suitability

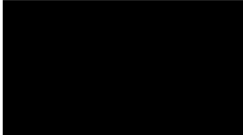
Classification: Public

Annexure D4 Criterion 2 Declaration (Suitability)

09 April 2026

I, Jordan Miller-Owen of [REDACTED] being Chief Executive Officer of Eastern Electric Pty Ltd, declare that Eastern Electric's current director/s (or shadow / de facto director/s), and any other person that exerts control Eastern Electric Pty Ltd's business activities and all persons who are responsible for significant operating decisions Eastern Electric 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 Eastern Electric Pty Ltd's capacity as an energy retailer.

Yours truly,
Jordan Miller-Owen

A black rectangular box redacting the signature of Jordan Miller-Owen.

09 April 2026

Annexure D5

Criterion 4 Declaration · Suitability

Classification: Public

Annexure D5: Criterion 4 Declaration (Suitability)

09 April 2026

I, Jordan Miller-Owen of [REDACTED] being Chief Executive Officer of Eastern Electric Pty Ltd, declare that:

- No member of Eastern Electric 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 Eastern Electric Pty Ltd's management team.

Yours truly,
Jordan Miller-Owen

A black rectangular box redacting the signature of Jordan Miller-Owen.

09 April 2026