



Brighte Energy Pty Ltd

ACN 646 449 247

AER

Application for Retail Authorisation

26 February 2021

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1 GENERAL PARTICULARS

1.1 Legal name:

Brighte Energy Pty Ltd (hereafter referred to as **Brighte Energy** in this application).

1.2 Trading name:

Brighte Energy does not intend to trade under a different trading name.

1.3 ABN or ACN

ACN 646 449 247

1.4 Registered Business Address

Level 15, 1 Margaret Street, Sydney NSW 2000.

1.5 Contact Person

Katherine McConnell

Chief Executive Officer

Brighte Capital Pty Limited

Email: [REDACTED]

Mobile: [REDACTED]

1.6 Type of Retailer Authorisation Sought

Brighte Energy is applying for a retailer authorisation to retail electricity under the National Energy Retail Law (**Retail Law**).

1.7 Commencement Date

Subject to obtaining a retailer authorisation as an outcome of this application, Brighte Energy intends to commence retailing electricity in the jurisdictions mentioned below on 1 July 2021.

1.8 Nature and Scope of the Company's Operations

Brighte Energy is seeking authorisation for the sale of electricity to small residential and small to medium sized business customers with an annual demand of 160 MWh or less.

1.9 Jurisdictions

Brighte Energy proposes to retail electricity throughout all NEM jurisdictions. Brighte Energy also intends to apply to the Essential Services Commission (**ESC**) in Victoria for an energy retail licence.

1.10 Intended Market

Brighte Energy intends to retail electricity to small customers as defined in section 5 of the Retail Law.

2 ORGANISATIONAL AND TECHNICAL CAPACITY

2.1 Previous Energy Retailer Experience

Brighte Energy has not previously operated as an energy retailer. However, the director and key employees have significant experience in the retail energy market and across the energy sector value chain.

Brighte Energy is a wholly owned subsidiary of Brighte Capital Pty Limited ACN 609 155 906 (**Brighte**). **Annexure 1** shows the corporate structure of the Brighte Group.

Brighte is an innovative and customer focused fintech that provides finance for the purchase of new energy tech products including PV rooftop solar and batteries and energy efficient home improvement products. Brighte has grown rapidly since it began lending in October 2016.

Brighte obtained Australian Credit Licence 508217 in February 2019. Brighte offers a buy now pay later product and a personal loan product to enable customers to purchase new energy tech products. The personal loan product is regulated by the National Consumer Credit Protection Act (NCCPA).

To date, Brighte has assisted 75,000 homes to access finance, totalling more than \$615 million, of which 50,000 were for solar.

2.1.1 The form/s of energy sold

Brighte Energy has not previously operated as an energy retailer.

2.1.2 The scale of previous operations (including the number and size of customers)

Brighte Energy has not previously operated as an energy retailer.

2.1.3 A description of how the retail activities were conducted.

Brighte Energy has not previously operated as an energy retailer.

2.2 Any other relevant energy or market experience

Brighte Energy's key employees have significant experience in the energy retail sector and its associated markets. A summary of their experience and technical skills are outlined in section 2.4.

Brighte Energy's key employees have come from a background of working in and around retail energy for major energy retailers and relevant areas of the energy sector. Brighte,

Brighte Energy's parent company, has operated in the market for distributed energy resources for the last four years.

Brighte Energy is in the process of recruiting additional suitably qualified employees, engaging external service providers and obtaining external expertise to ensure it can fully undertake its functions as a licensed retail energy business.

Brighte is an active participant in the clean energy industry. Brighte is a Platinum Member of the Smart Energy Council and a Corporate Member of the Clean Energy Council.

2.3 Organisational Chart

The Organisational Chart in **Annexure 2**, marked as commercial-in-confidence, outlines Brighte Energy's operational structure.

2.4 Employees

Brighte Energy's activities and organisation are and will continue to be directly supported by key employees and shared resources from Brighte. It is envisaged that Brighte and Brighte Energy will enter into a Services Agreement to formalise the provision of services from Brighte to Brighte Energy's electricity retail activities. In accordance with our organisational structure, Table 1 outlines the number of current employees supporting the Brighte Energy business, broken down by business unit. The number of employees supporting Brighte Energy will grow in line with the growth of Brighte Energy.

Table 1 Number of employees by business unit

Position/ business unit	Number of positions
CEO and Director; Co Sec	2
CFO	1
CRO	1
CTO	1
Legal, Risk and Compliance	3
Energy Compliance Manager	1
Commercial and Product development	4

2.5 Qualifications, Technical Skills And Experience of Key Personnel

Brighte will provide services, including sharing some key staff to support Brighte Energy's operations. As its market share grows, Brighte Energy intends to replace shared roles with full-time roles dedicated to Brighte Energy.

The qualifications, technical skills and experience of key team members supporting Brighte Energy are summarised below. **Annexure 3** contains the resumes of key personnel and additional employees.

2.5.1 Katherine McConnell, Founder, Chief Executive Officer and Chair

Katherine is the Founder, Chief Executive Officer (**CEO**) and Chair of Brighte, an innovative, award-winning Fintech and market leader in energy finance. Brighte's digital payments platform offers Australians an easy and affordable way to pay for solar and clean energy for their homes. Brighte helps businesses close more sales and manage cashflow by offering friction-less finance to their customers.

Katherine is Brighte Energy's CEO and sole director.

Prior to Brighte, Katherine worked in investment banking and financial services for 20 years, including 14 years at Macquarie Bank as founding member of its Energy Leasing business. Katherine is currently a Non-Executive Director of the Australian Finance Industry Association (AFIA).

Katherine is a recognised leader, winning multiple awards, including Female Fintech Leader of the Year 2020 and Finder's Green Leader of the Year 2020. Katherine has spoken at Smart Energy Council (SEC) and Clean Energy Council (CEC) conferences and is included in the CEC Women in Renewables Speaker's Guide.

2.5.2 John Rohl, Chief Corporate Development Officer and Company Secretary

John has over 20 years experience in finance and energy and spent over a decade at Macquarie Bank and in corporate development at AGL.

John is the Company Secretary for Brighte and Brighte Energy.

2.5.3 Rachel Gatehouse, Chief Operating and Financial Officer

Rachel is an accomplished Chief Operating and Financial Officer with more than 25 years' experience in the financial services sector. She has strong governance expertise having operated in complex and highly regulated environments across ASX listed and global enterprises.

Rachel is also a Director on the Board of Landcare Australia and has a strong interest in sustainable land management.

2.5.4 Julian Dell, Chief Technology Officer

Julian is an accomplished Chief Technology Officer with a long-standing career in the development of new technologies in the fintech and energy technology sector. Examples of his accomplishments include:

- Management of the technical and operational due diligence of the acquisition of Click Energy;
- Management of the integration of Click Energy from a business perspective including the inclusion of energy operations in the amaysim contact centre;
- Management of the build of amaysim Energy;

- Strategic review and ownership of Click/amaysim energy technology platforms and infrastructure; and
- Innovation lead for new energy product investigation.

2.5.5 Ann Devine, Chief Risk and Regulatory Officer

Ann Devine is Brighte's Chief Risk and Regulatory Officer and leads Brighte's Risk and Compliance function. She is a lawyer with over 20 years' experience in legal, risk and compliance. Ann has held senior roles with financial industry regulators, fund managers and superannuation funds.

Ann is responsible for regulatory and industry engagement in the financial services and energy industries. She engaged extensively with energy industry participants, the ACCC and government as part of Brighte's participation in the New Energy Tech Consumer Code approval process. Ann also manages Brighte's regulatory interactions with the Clean Energy Regulator and industry including the Smart Energy Council and the Clean Energy Council. Ann spoke at the Clean Energy Council (CEC) conference in 2019 and is included in the CEC Women in Renewables Speaker's Guide.

2.5.6 Phachara (Pat) Niumsawatt, Head of Wholesale Market and Energy Technology

Phachara (Pat) Niumsawatt is Head of Wholesale Market and Energy Technology at Brighte Energy. Reporting to the CEO, he is responsible for the Wholesale electricity trading and risk management and participation of DER assets in the NEM.

Before joining Brighte Energy, Pat worked at Sonnen Australia as Director of Wholesale & Flexibility Markets. He worked closely with Head of eServices in the design and on-going delivery of Retail electricity products and oversaw all aspects of Virtual Power Plant programs. Pat also has over 15 years of experiences in multiple industries across APAC region, and over seven years with Enel X/EnerNOC responsible for Demand Respond programs in NEM, WEM, and other electricity markets outside Australia.

2.5.7 Josh Devenny, Head of Product, Brighte Energy

Josh Devenny is Brighte's Head of Product for the Energy Business. Josh is responsible for Brighte's Energy product strategy and the creation of compelling customer offers and customer experience through our website, mobile apps, and systems.

Prior to joining Brighte, Josh was the Principal Product Manager for Atlassian's Cloud Platform, building key platform services in a transition of Atlassian's products to use a common set of services. In his nine years at Atlassian, Josh also built the Product Growth Engine for Atlassian and was the main product manager in the repackaging of Jira Software, Jira Service Desk, and Jira Core as standalone products.

2.5.8 Nick Bradley, Energy Product Manager

Nick Bradley is the Product Manager for Brighte Energy. Reporting to the Head of Product, Brighte Energy, he is responsible for the product development lifecycle in the Energy business. Nick also assists the Head of Product, Brighte Energy in market research, project management and business model development.

Prior to joining Brighte, Nick worked at Sonnen Australia in a Business Development Strategist role where he led project sales for Sonnen's batteries and was involved in the product development process for DER related solutions. He has experience in working closely with retail energy and VPP strategies, regulations and customers. Prior to this he worked at Macquarie Bank in a Credit Risk Analyst role.

2.5.9 Conrad Guimaraes, Energy Compliance Manager

Conrad Guimaraes commences as Brighte's Energy Compliance Manager on 17 March 2021. He has energy regulator and industry experience. Conrad will be responsible for ensuring Brighte Energy's compliance with regulatory obligations in the energy sector.

Conrad is joining Brighte from the Australian Energy Market Commission where he has been working as a Policy Adviser on projects related to the Energy Security Board led Post-2025 market design, the AEMC's 2020 Retail Competition Review and rules related to the Australian Retail and Wholesale Energy market. Prior to that Conrad was a Policy and Engagement Coordinator at Jemena working on its Price reset project team with a focus on best practice community engagement with network customers.

2.6 Outsourced Services

Brighte Energy understands that it must demonstrate that it has the required organisational and technical capacity and resources to hold a retail energy authorisation.

It recognises that it will need to obtain additional support and expertise to ensure it can fulfil its functions as a licensed retail energy business and provide best in industry service to its customers. Functions that will be outsourced include meter to cash functions including customer provision, transfers and billing.

Brighte Energy is undertaking a due diligence process on preferred services providers in accordance with its Supplier Management Framework **Annexure 4**. Brighte Energy will ensure that all of its obligations as an authorised energy retailer are met. The key criteria when evaluating its potential partners include the ability to:

- Establish and manage customer accounts;
- Undertake customer billing;
- Store and manage documents;
- Provide customers with notices and other documentation;
- Option to provide at scale customer service and dispute resolution handling;
- Customer service interface: customer CRM, billing and data usage patterns; and

- Ability to comply with regulations related to life support.

Annexure 5 contains information about the potential outsourced service providers that we are currently engaged in discussions with and undertaking due diligence on. It also contains letters of Intent, signed by our preferred providers.

2.6.1 Summary of third party's experience in the relevant outsourced services

As noted above Brighte Energy is currently undertaking due diligence on a number of preferred services providers. They are reputable and experienced and are already supporting other providers in the Australian energy market. **Annexure 5** provides information about our preferred providers' experience in the relevant outsourced services.

2.6.2 Evidence of third party's technical capacity

Annexure 5 provides information about the technical capability of our preferred providers.

2.6.3 Controls to ensure the third party's compliance

Brighte Energy will exercise due skill and care in selecting and appointing suitable service providers and will comply with its Supplier Management Framework (**Annexure 4**) when engaging third party service providers.

Brighte Energy will enter into services agreements with selected service providers. Such an agreement would include obligations to ensure that all third parties are:

- Following controls in place to ensure compliance with the National Electricity Retail Law (NERL) and the National Electricity Retail Rules (NERR);
- Making available to Brighte Energy any technical capacity they may have and which Brighte Energy requires to meet its obligations as an authorised retailer;
- Providing all information and reasonable assistance as required for Brighte Energy to discharge its regulatory obligations; and
- Providing any updates to their systems and processes as required by the market whether regulatory or best industry practice to ensure that Brighte Energy can always meet its obligations as an authorised retailer.

Brighte energy will monitor the ongoing performance of all service providers in accordance with the Supplier Management Framework. It will deal effectively with any breaches of the outsourcing agreement or actions that lead, or might lead, to a breach of its licensee obligations in accordance with the terms of the service level agreement. Brighte Energy will also follow Brighte's Incidents and Issues Management Policy, referred to in 2.8, as appropriate.

2.7 Business Plan

Brighte Energy's Business Plan has been provided in **Annexure 6**. It provides an overview of the strategic direction, objectives, product details and sales and marketing for the Brighte Energy business. The forecast results and detailed assumptions on how the forecasts were

calculated are contained in the Brighte Energy Financial Forecast (**Annexure 7**) as outlined in section 3.7 below.

2.8 Compliance Strategy

Brighte Energy understands that electricity is an essential service. It is aware that electricity retailing is subject to extensive regulatory, statutory, industry and technical requirements.

At Brighte, risk and compliance is everyone's responsibility. Brighte Energy adopts a Three Lines of Defence Model as the foundation for its strong risk and compliance culture. Business Operations, Risk and Compliance and Internal and External Audit are the first, second and third lines of defence, respectively.

Financial services is a heavily regulated industry. As noted in section 2.1 above, Brighte obtained its Australian Credit Licence 506217 in February 2019. We offer a buy now later product and a personal loan that is regulated under the National Consumer Credit Protection Act (NCCPA). We have robust risk and compliance frameworks in place to ensure ongoing compliance with financial services laws and regulatory obligations. We are confident in our ability to operate in highly regulated environments including finance and retail energy.

Brighte Energy's Compliance Strategy is attached as **Annexure 8A**. It has been developed in accordance with Australian Standard AS ISO 19600:2015 Compliance Management Systems.

Brighte Energy's employees are committed to ensuring compliance with the AER conditions, the various Acts and Regulations under which the AER operates, and good corporate governance principles.

Brighte Energy's team has significant experience in the electricity sector and with electricity retailers, providing an understanding of the requirements to comply with the following:

- National Electricity (South Australia) Act 1996;
- National Energy Retail Law (South Australia) Act 2011;
- The National Energy Retail Rules Version 24;
- National Electricity Rules Version 155;
- National Energy Customer Framework;
- Australian Consumer Law as Schedule 2 of the Competition and Consumer Act 2010;
- Essential Services Commission ("ESC") codes;
- ESC regulatory guidelines and codes including the Electricity Industry Act 2000;
- Regulatory requirements enforced by the Australian Competition and Consumer Commission (ACCC) including the Australian Consumer Law; and
- Any other relevant laws and regulations relevant in each NEM State and Territory.

The compliance measures relating to each legislative requirement will be outlined in Brighte Energy's Obligations Register contained in Brighte's automated Governance, Risk and Compliance (GRC) system (Triline). Brighte Energy has a designated team to develop the Obligations Register. It will be operational by the time the retail electricity authorisation is

received. The Obligations Register will demonstrate our knowledge and understanding of the obligations as an authorised retailer in each of the jurisdictions in which we intend to operate and the policies, procedures and processes in place to ensure compliance.

The compliance policies and documentation in **Annexure 8** set out Brighte Energy's compliance, monitoring and reporting framework to address AS ISO 19600:2015 Compliance Management Systems. Brighte takes feedback from our customers seriously. We have an internal complaint resolution team to assist with managing any concerns quickly and fairly. Brighte Energy's Complaints and Dispute Resolution Procedures are contained in **Annexure 8B**. Brighte manages incidents, issues and breaches in accordance with its Incidents and Issues Management Policy. It is **Attachment 8C** and outlines Brighte Energy's processes to identify and remedy compliance breaches. Brighte Energy is committed to protecting our customers privacy. The Privacy Policy is **Annexure 8D**.

Brighte Energy recognises its responsibility to ensure its staff are adequately trained and undertake their compliance obligations in a responsible and diligent manner. Training about compliance requirements is delivered via face to face, workshops and online.

2.9 Risk Management Strategy

Brighte Energy recognises that well managed risk is essential to its success in meeting its obligations and objectives as an Authorised Energy Retailer. The Brighte board has approved the overarching Risk Management Framework governing Brighte.

Brighte Energy's Risk Management Strategy is attached as **Annexure 8E**. It covers the management of Brighte Energy's material financial, operational, regulatory, reputational, strategic and technology risks. A list of Brighte Energy's material risks is contained in the Risk Management Strategy.

Brighte uses the Triline GRC system to support its risk management and assurance processes, including identification and rating of risks, development of controls, monitoring and reporting. It also contains corporate risk and compliance registers, for example the Incidents and Issues Register and the Conflicts of Interest Register.

2.10 Risk Management and Compliance - External Assurance

Brighte Energy's risk management and compliance strategies have undergone an external assurance process. **Annexure 8F** is confirmation of the independent external audit conducted by Ashurst Lawyers dated 15 December 2020.

2.11 Risk Management and Compliance – Additional Information

Brighte Energy has an experienced team in place. However, Brighte Energy is committed to fill any gaps in the skills and knowledge of our staff and manage such gaps through additional training and recruitment, with the objective to manage risk in accordance with the Retail Law objective.

Brighte Energy is well progressed in our ability to manage risk and operate in accordance with Retail Law objective to serve the long-term interests of our customers. Additional information that demonstrates our commitment to risk management and compliance are Brighte Energy's Retail Customer Contracts that appear as **Annexures 9A and 9B**.

2.12 Energy Industry Ombudsman Scheme Membership

Brighte Energy has contacted the relevant energy Industry Ombudsman Schemes in each of the jurisdictions in which we intend to retail energy to small customers. Evidence of the steps taken to obtain membership are contained in **Annexures 10A - 10D**.

2.13 Arrangements with Key Market Participants

2.13.1 AEMO

Brighte Energy is familiar with the AEMO registration process and is intending to lodge its full application. Brighte Energy will submit an application to AEMO to become a market participant, prior to commencing operation as an electricity retailer.

As noted in section 2.5.6, Phachara (Pat) Niumsawatt is the Head of Wholesale Market and Energy Technology at Brighte Energy. He is responsible for managing Wholesale electricity trading and risk management and overseeing retail energy tariffs, which includes designing retail tariff offers, competitive analysis, retail/wholesale cost analysis and optimisation (**Annexure 2**).

The cost of prudential guarantees has been included in the financial forecast.

2.13.2 Distribution Use of Systems Agreements

Brighte Energy is in the process of contacting distribution companies with a view to establishing contracts, and these will be formally agreed well in advance of market entry. The Business Plan (**Annexure 6**) contains the relevant distribution costs, including the cost of providing Credit Support to network companies.

2.13.3 Clean Energy Renewable Scheme

To enable Brighte Energy to surrender small-scale technology certificates and large-scale generation certificates, a registration application will be lodged with the Clean Energy Regulator in advance of market entry. Brighte Energy intends to participate in all relevant energy efficiency schemes in the jurisdictions it operates in.

3 FINANCIAL RESOURCES

3.1 Audited Financial Records

As a new corporate entity, Brighte Energy does not have financial reports for the last 12 months. As it is wholly owned subsidiary, **Annexure 11** contains a copy of the Annual Report for the parent company Brighte, as at 30 June 2020. The Annual Report contains all financial statements required by the accounting standards in compliance with Corporations Act 2001, Australian Accounting Standards and Corporations Regulations 2001.

It contains the notes to the financial statements, including disclosure required by the regulations, notes required by the accounting standards, and any other information necessary to give a true and fair view of the financial statements.

3.2 Corporate Structure

Annexure 1 shows Brighte's corporate structure, including Brighte Energy. It outlines the contractual arrangements (e.g. alliance contracts, associate contracts, establishment contracts) that define relationships within the group, including shared resources, guarantees, revenue flows, obligations and/or responsibilities.

3.3 Going Concern Declaration

Annexure 12 contains a written declaration by Rachel Gatehouse, Brighte Capital's Chief Operating and Financial Officer, stating that Brighte Energy is a going concern and that she is unaware of any factor that would impede Brighte Energy's ability to finance its energy retailer activities under the retailer authorisation for the next 12 months.

3.4 Consolidated audited financial statements for the Group

The consolidated audited financial statements for the Brighte Group are outlined in **Annexure 11**.

3.5 Independent Auditor's Statement

Annexure 13 is a written declaration by Grant Thornton, Brighte Capital's independent auditors, outlining Brighte Energy's solvency and financial capabilities for the purpose of applying for Retailer Authorisation.

3.6 Arrangements to Access Additional Capital

Brighte Capital's Annual Report, in **Annexure 11**, provides details of arrangements for Brighte Energy to access additional capital if required. The Business Plan in **Annexure 6** also contains information about the arrangements.

3.7 Forecast Revenue and Expenses

Annexure 7 contains **Brighte Energy's Financial Forecast** of revenue and expenses to the point where the business is cashflow positive.

3.8 **Additional Information in Relation to Financial Capacity**

In October 2020 Brighte successfully issued Australia's first 100% Green Asset Backed Security (ABS) Bond into the public debt markets of \$190 million. It was rated by external rating agency Moody's and received an AA rating in its top tranche. Evidence of the Moody's rating is provided in **Annexures 14A and 14B**.

This is an excellent result for a first-time issuer and demonstrates Brighte's expertise in facilitating transactions with respect to energy assets. **Annexure 14C** is an example of media reporting about the issuance.

The Bonds also received Climate Bond Certification from the Climate Bonds Standard Board (**Annexure 14D**). This highlights Brighte's ability to create sustainable and innovative financial products for our customers.

Annexure 14E contains an Equifax Company Inquiry for Brighte. It demonstrates Brighte's strong financial position and creditworthiness.

4 SUITABILITY CRITERION

4.1 CEO's Declaration about Regulatory and Legal Matters

Annexure 15 is the CEO's declaration that there have not been any:

- Material failure to comply with legal or regulatory requirements;
- Revoked authorisations, authorities or licences in any industries;
- Failed authorisation, authority or licence applications in any industry;
- Past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry; or
- A situation where the RoLR requirements have been triggered.

4.2 CEO's Declaration about Offences and Prosecutions

Annexure 16 contains the CEO's written declaration that there have been no offences or successful prosecutions in relation to Brighte Energy's director, persons who exert control over Brighte Energy's business activities or people who are responsible for significant decisions of Brighte Energy.

Brighte Energy will provide criminal history check's conducted within the past 12 months for persons listed as officers or associates of Brighte Energy, upon request.

4.3 CEO's Declaration about the Management Team

Annexure 17 contains the CEO's written declaration, outlining the suitability of Brighte Energy's management team.

4.4 Officer Details

Annexure 18 provides full names and current residential addresses of Brighte Energy's officers.

4.5 Policies and Procedures Addressing the Probity and Competence of Key Staff

Brighte Group's People and Culture Function has a dedicated Talent Acquisition team. All potential candidates are selected based on the agreed skill criteria set by the hiring manager and in accordance with Brighte Group Values. Candidates progress through several rounds of interview and reference checks. After an offer of employment is made police checks, bankruptcy checks and AML/CTF checks are undertaken for senior management and other roles, as required.

Brighte Energy's Code of Conduct is contained in **Annexure 19**. All employees are required to sign it as part of their contract of employment.

5 ANNEXURES

The following Annexures are provided on a **Commercial-in-Confidence** basis.

- Annexure 1 Corporate Structure
- Annexure 2 Organisational Chart
- Annexure 3 Resumes of Key Personnel
- Annexure 4 Supplier Management Framework
- Annexure 5 Outsourced Services – Letters of Intent and Capability Statements
- Annexure 6 Business Plan
- Annexure 7 Financial Forecasts
- Annexure 8 Compliance and Risk Management Documentation:
 - Annexure 8A Compliance Strategy
 - Annexure 8B Complaints and Dispute Resolution Procedures
 - Annexure 8C Incidents and Issues Policy Management Policy
 - Annexure 8D Privacy Policy
 - Annexure 8E Risk Management Strategy
 - Annexure 8F External Assurance Audit for the Compliance Strategy and the Risk Management Strategy
- Annexure 9 Electricity Retail Contracts
 - Annexure 9A Brighte Energy Standard Retail Contract – Small Customers (NERL)
 - Annexure 9B Brighte Energy Standard Retail Contract – Small Customers (Vic)
- Annexure 10 Ombudsman Membership
 - Annexure 10A Energy Ombudsman Tasmania
 - Annexure 10B ACAT Ombudsman
 - Annexure 10C Energy Ombudsman - EWOSA
 - Annexure 10D Energy Ombudsman - EWON
- Annexure 11 Brighte Capital Pty Limited Annual Report, as at 30 June 2020
- Annexure 12 Going Concern Declaration
- Annexure 13 Independent Auditor’s Statement
- Annexure 14 Additional Information in Relation to Financial Capacity

Annexure 14A Moody's Rating dated 29 October 2020

Annexure 14B Brighte Green Trust 2020-1 Moody's – New Issue Report

Annexure 14C Media Article About the Brighte Green Trust 2020--1

Annexure 14D Climate Bond Certificate

Annexure 14E Brighte Capital – Equifax Company Inquiry

Annexure 15 Declaration about Regulatory and Legal Matters

Annexure 16 Declaration about Offences or Prosecutions

Annexure 17 Declaration about the Brighte Management Team

Annexure 18 Details of Key Personnel

Annexure 19 Code of Conduct