

APPLICATION FOR ELECTRICITY RETAILER AUTHORISATION



This authorisation application for electricity is submitted for the attention of:

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



Commonwealth of Australia

STATUTORY DECLARATION

Statutory Declarations Act 1959

I, Anthony Callan of 3 Marjory Place, Baulkham Hills NSW, being the Acting Managing Director of the applicant, Delta Electricity ABN 75 162 696 335, make the following declaration under the *Statutory Declarations Act 1959*:

That the information contained in this application, and the attachments thereto upon which I have placed my signature, for the grant of a supply or sale of electricity (electricity retail) licence under the National Energy Retail Law is true and correct.

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

Declared at Sydney, on the 26th day of September, 2017.

Anthony Callan

Before me,

Joanne Crossweller (CPA)



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Introduction

Sunset Power International Pty Ltd trading as Delta Electricity operates the Vales Point Power Station, which is a coal-fired power station located on the southern shores of Lake Macquarie near the township of Mannering Park, New South Wales.

The station provides a reliable supply of 24-hour baseload electricity with installed capacity of 1,320MW. Part of Vales Point's coal supply is co-fired with biomass to replace a proportion of coal with a renewable fuel. Vales Point produces around four per cent of the electricity needed by electricity customers in the National Electricity Market (NEM).

Delta Electricity is seeking to develop a retail electricity business to retail to large customers only.

The following information is provided in accordance with the Australian Energy Regulator's (AER) Retailer Authorisation Guideline.

1.0 General Particulars

1.1 Legal name

The applicant's legal name is Sunset Power International Pty Ltd.

1.2 Trading name

Delta Electricity.

Appendix 1 provides a copy of Delta Electricity's Business Registration Certificate.

1.3 ACN

Delta Electricity's ACN is 162 696 335.

1.4 Registered business address

Our principal business address is:

Delta Electricity
Level 7/287 Elizabeth Street
Sydney NSW 2000



1.5 Nominated contact person

The nominated contacts for this application are:

Angela Riley
Sales Manager
Delta Electricity
Level 7/287 Elizabeth Street
Sydney NSW 2000
Phone: (02) 4352 6468
Email: angela.riley@de.com.au

Anthony Callan
Executive Manager Marketing
Delta Electricity
Level 7/287 Elizabeth Street
Sydney NSW 2000
Phone: (02) 4352 6412
Email: tony.callan@de.com.au

1.6 Form of energy for authorisation

Delta Electricity is applying for authorisation to retail electricity in all AER state jurisdictions.

1.7 Commencement date of retailing energy

Delta Electricity aims to commence retailing electricity from January 2018 onwards once authorised.

1.8 Nature and scope of operations

Delta Electricity is currently an electricity generation business with plans to enhance its business model to include a retailing function.

The retail business will provide a natural offset or hedge for the generation business and allow Delta Electricity to leverage off its existing internal business skills and experience in wholesale trading and risk management functions. This will enable Delta Electricity to provide innovative and competitive retail products and services in the energy market for large electricity retail customers.

1.9 Jurisdictional coverage

Retailing activities will initially be focused in NSW where Delta Electricity's existing generation assets are located. However, as the generation portfolio grows or as opportunities arise, Delta Electricity may retail to other state jurisdictions under the AER over time.



1.10 Type of customers

Delta Electricity intends to retail electricity to large commercial or industrial customers only. Delta Electricity does not intend to retail electricity to small customers (as defined under the National Electricity Rules and Regulations).

2.0 Organisational and Technical Capacity

2.1 Previous industry experience as an energy retailer

Since before the commencement of the National Electricity Market, Delta Electricity has been a direct supplier to two large industrial customers: BlueScope Steel's steelworks at Port Kembla and the Hydro Aluminium smelter at Kurri Kurri (now closed). Delta Electricity managed the long term supply arrangements for these customers, including variation of these supply agreements as required to deal with emergent issues such as carbon liabilities. Delta Electricity already has the capabilities to manage customer service and support requirements and management, retail load risk management, settlements and invoicing, and compliance and reporting processes in relation to this direct supply load.

Delta Electricity is also in the process of applying for an electricity retail authority with the Essential Services Commission in Victoria. The broad operational framework including responsible staff and business strategy to support retail activities in these jurisdictions is the same as those outlined in this proposal, except for those relating to different regulatory requirements and financial forecasts in each region.

2.2 Other relevant retail or energy market experience

Delta Electricity is an active participant in electricity, gas, coal and environmental markets, trading across both financial and physical markets. Delta Electricity's team has been active in the National Electricity Market ("NEM") since December 1998.

Delta Electricity is currently an active electricity trader across the major NEM nodes (primarily in NSW but also including Victoria and Queensland) and associated environmental markets including STCs, LGCs, and ESCs. Delta Electricity is also a wholesale trader in gas and has a large presence in the physical markets for coal.

Delta Electricity holds an Australian Financial Services Licence (AFSL) which authorises it to make markets and deal in electricity derivative products. Delta Electricity is also a provider of a range of structured risk management products to wholesale participants in the NEM.

Delta Electricity's trading team is experienced across electricity and other commodity markets, enabling it to manage its risk exposures through using physical generation capacity, electricity market insurance products as well as energy derivatives across both exchange-traded and over-the-counter markets with a wide range of trading counterparties.

The staff that Delta Electricity will have actively involved in functions under the Retail Authorisation are experienced energy market professionals with a range of backgrounds and expertise that make Delta Electricity well-positioned to operate a successful retail business. Further details are provided in section 2.6.



2.3 Shareholder and Director's energy market experience

Delta Electricity will benefit significantly from the experience of its directors and shareholders in particular, Trevor St. Baker, Brian Flannery and Greg Everett.

2.3.1 Trevor St. Baker

Mr St. Baker has over 50 years' experience in the energy industry, including 23 years in planning and leadership roles within New South Wales and Queensland public utilities.

In 1980, Mr St. Baker founded companies which have evolved into ERM Power, Delta Electricity and the St Baker Energy Innovation Fund. For the first 15 years it operated as a successful boutique energy advisory firm, transforming into a private power development company in the mid-1990s, with the development of six major gas-fired power stations across three States. Since 2006, it evolved into ERM Power Pty Ltd which has since become an integrated, publicly listed energy company which operates electricity sales, generation and gas businesses.

In 2013, Mr St. Baker established what is now the St Baker Energy Innovation Fund, investing in new-start energy R&D companies attempting to commercialise new products internationally. This shaped what is now a stable of already successful new enterprises in which the St Baker Energy Innovation Fund and Mr St. Baker are actively involved in, including Tritium Pty Ltd, Printed Energy Pty Ltd, Southern Cross Printed Electronics Pty Ltd, and US printed light company, Nth Degree Technologies LLC.

In 2014, Mr St. Baker established Sunset Power International Pty Ltd to bid for a new gas-fired power development in Myanmar and to acquire and develop other new power stations nationally and internationally, successfully acquiring Delta Electricity and the Vales Point coal-fired generation business from the NSW Government in 2015.

Mr St. Baker continues to play an active role in the broader energy industry including the Chair of the National Generators Forum for three years to 2013, and as a director on the board of Queensland Resources Council Ltd up to 2015. Mr St. Baker is currently on the board of Energy Policy Institute Australia Limited.

2.3.2 Brian Flannery

Mr Flannery has more than 40 years' experience in the development, engineering, construction and management of open cut and underground coal mines and associated infrastructure, including rail and port construction and operation.

Mr Flannery has been involved in the development of open cut and underground mines in Australia and India. Additionally, Brian has also been involved in ventures in property development, aged care and agricultural industries.

Mr Flannery holds directorships in several family related companies and is the Managing Director of ASX-listed White Energy Company Limited. He is also the Chair of Mater Misericordiae Ltd in Brisbane.

2.3.3 Greg Everett

Mr Everett has been the Chief Executive Officer and now Managing Director of Delta Electricity since 2010. Mr Everett has over 30 years' experience in the electricity industry, 20 of which have been in executive roles in the generation sector.



Mr Everett has previously represented Delta Electricity on the Energy Supply Association Australia (ESAA), National Generators Forum (NGF) and the National Carbon Capture and Storage Council of Australia. Greg was a founding director of the Competitive Energy Association.

Mr Everett is currently a member of the International Energy Agency's Coal Industry Advisory Board as the Federal Government's nominated generator, and a member of the NSW Coal Innovation Board.

Mr Everett holds a Bachelor of Commerce and MBA (Finance) and is a graduate of the Australian Institute of Company Directors and the Stanford Executive Program.

2.4 Organisational chart and structure

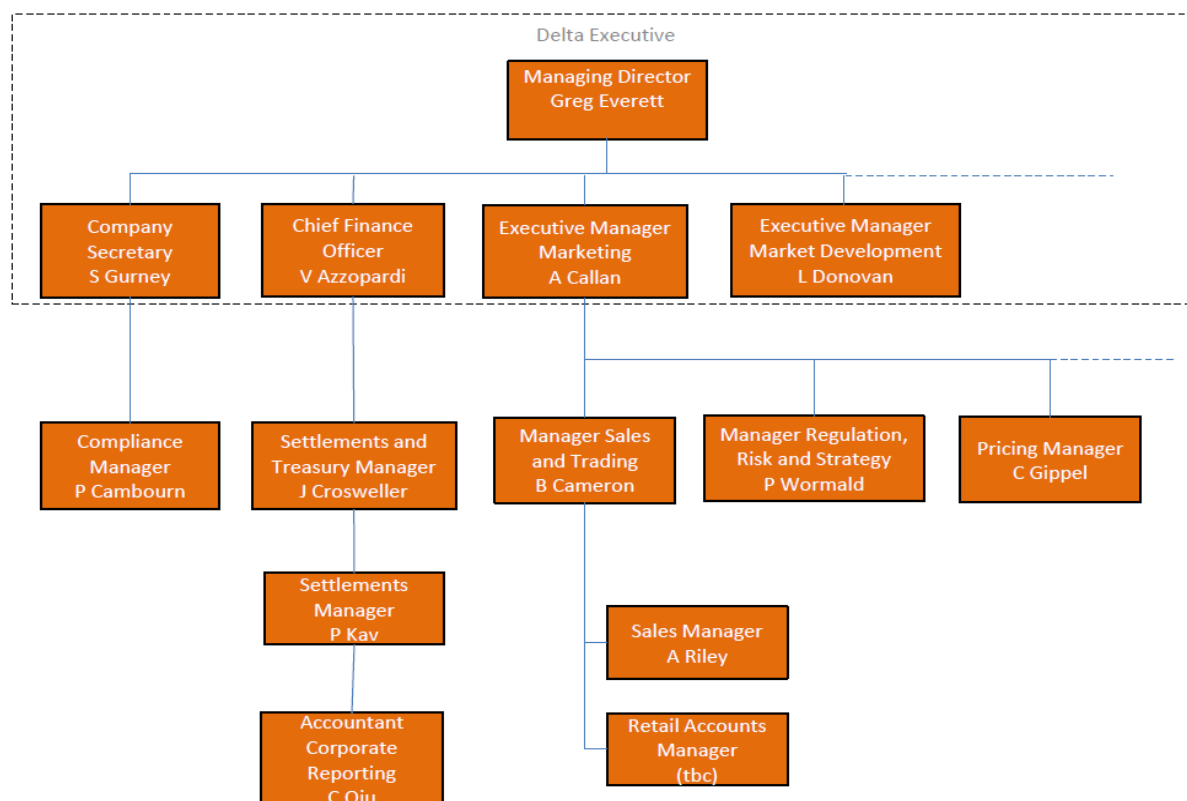
The high level organisational chart below outlines key staff, reporting lines and functions associated within Delta Electricity's retail electricity business.

The key responsibilities are as follows:

- The Marketing Group will have responsibility for customer sales, pricing and account management functions as well as management of the wholesale electricity market, liquidity and operational risks.
- The Marketing Group will also have responsibility for the development of customer contracts and terms and conditions.
- The Finance Group will have responsibility for the management of cash flows, customer credit, billing and customer collections.
- The Company Secretary will have responsibility for oversight of legal services and compliance.



Organisation Chart – Delta Electricity Retail Function



2.5 Number of employees

As at August 2017, Delta Electricity had a total of 272 employees across eleven business units. There will initially be thirteen Delta Electricity staff directly involved in the performance of functions under the Retail Authorisation.

Further detail is provided on a commercial-in-confidence basis in Appendix 2.

2.6 Qualifications, technical skills and experience of key officers

The staff that will be involved in the performance of functions under the Retail Authorisation have a range of experience in the energy industry and have been heavily involved in Delta Electricity's activities in the Australian electricity market since the commencement of the National Electricity market in December 1998.

Delta Electricity believes this makes it well placed to successfully carry out its activities under the Retail Authorisation and comply with all regulatory obligations.

A summary of the qualifications and experience of relevant Delta Electricity staff is provided in Appendix 3.

2.7 Outsourced service providers

Given the small number of customers envisaged there is limited outsourcing of retail related systems, capabilities and functions. Frontline support for all major IT systems is managed and maintained internally. This is



supplemented by software vendor maintenance contracts for key IT systems including trading, compliance, risk and settlement systems.

Delta Electricity uses a panel of legal advisors to provide legal support.

2.8 Business plan

Delta Electricity's corporate business plan is focused on hedging the value of the output of its generation portfolio to manage revenue risk. While the majority of this hedging occurs through participation in the wholesale electricity derivative markets, retail supply has always been a component of Delta Electricity's sales and Delta Electricity has identified the opportunity to expand its retail presence.

In its commercial-in-confidence Retail Business Plan (refer Appendix 4), Delta Electricity's objective is to grow its retail customer base as an alternative channel to market. The retail market can address deficiencies in the wholesale derivatives market such as occasional periods of low liquidity, particularly for longer term contracts.

Delta Electricity's derivative trading activities have included a range of customised hedging products tailored to wholesale customer risk preferences. This background will be invaluable in developing tailored price risk products for large customers. Delta Electricity's initial planning is to set an objective of a relatively small number of large customers.

As Delta Electricity already has in place many of the requirements for retail supply by virtue of its direct supply load, expansion of this retail activity to include a small portfolio of large customers is considered to be a low incremental-cost exercise and this should reflect in the pricing that Delta Electricity is able to offer. Scale of economies also arise in reduced capital requirements for lodging bank guarantees with the Australian Energy Market Operator given Delta Electricity's position as a generator in the NEM.

As a capital intensive industry, Delta Electricity anticipates it will have much in common with the large customers it seeks to supply and that this shared background will make it easier to identify opportunities to create value for the customer, particularly in the area of demand side management and price risk management to cover the longer term.

Delta Electricity is capable of tailoring products to suit individual risk preferences and can provide a full spectrum of risk management products from pool pass-through to standard fixed-price fixed-term whole of meter contracts for electricity as well as managing any environmental market exposures. The large customers that Delta Electricity seeks to supply are familiar with managing risk across a range of exposures already, have processes in place to report and manage risk and would be well suited to managing their electricity and environmental market exposures through the products that Delta Electricity can provide.

Delta Electricity has prepared a commercial-in-confidence five-year financial forecast (refer Appendix 4) as part of this application which demonstrates that returns relating to activities undertaken under a retail authority make commercial sense and meet internal hurdles against a range of metrics. It also provides evidence that Delta Electricity is financially viable to provide the proposed electricity retail services and has sufficient financial resources to sustain its operations.



2.9 Compliance Strategy

2.9.1 Compliance program and procedures

As a registered and licenced generator in the NEM, Delta Electricity seeks to identify and comply with all statutory legal obligations that apply to it, including adhering to the requirements of laws, industry and organisational standards and codes, and principles of good governance.

Delta Electricity has developed a compliance program that aligns with Australian Standard *AS 3806 – 2006 – Compliance Programs* and is currently reviewing its compliance framework with a view to ensuring it aligns with the *AS/ISO 19600-2015 - Compliance Management Systems* standard. This program is an integral component of Delta Electricity's corporate governance framework.

Delta Electricity prepares and maintains a number of standards, policies and procedures which relate to its business operations. These are regularly reviewed and updated as appropriate to address relevant Compliance Obligations for the organisation.

Appendix 5 contains further detail on our compliance program and procedures.

2.9.2 Complaint and dispute resolution procedures

Delta Electricity is committed to an efficient and fair resolution of complaints and disputes from our stakeholders, local community and customers.

This is supported by Delta Electricity's culture that identifies complaints as an opportunity to improve operations and to recognise the interests and values of the local and regional communities.

Delta Electricity has a Dispute Management System (DMS) to assist in resolving external conflicts which may arise with one or more *Registered Participants* under clause 8.2 of the National Electricity Rules (Rules), in accordance with prescribed time periods.

Delta Electricity also has an External Complaints Management Standard that is designed to:

- a) maintain relationships with stakeholders, including the general public, by providing a process by which complaints can be raised with Delta Electricity;
- b) ensure equity, fairness and transparency in dealing with complaints and ensuring all complaints are treated as legitimate and investigated without prejudice;
- c) ensure all complainants are treated with respect, demonstrating impartiality and professionalism in addressing the matter raised;
- d) manage all complaints appropriately and efficiently by making complainants aware of Delta Electricity's role, the complaint handling process, the likely timeframe for resolution and the complainant's responsibilities;
- e) ensure the complaints process and outcomes contribute to the continuous improvement of the organisation; and
- f) manage complainant expectations by identifying Delta Electricity's responsibilities and commitments.



Each of Delta Electricity's individual retail supply contracts will incorporate a specific, agreed contract dispute management provisions. These provisions may differ between individual customers but will typically specify dispute escalation processes to senior officers of the parties, timetables and resolution processes that may follow pathways to resolution involving either arbitration or determination by an independent expert.

Further detail is provided on a commercial-in-confidence in Appendix 6.

2.9.3 Recruitment, training and development

Employee recruitment, training and development are fundamental to Delta Electricity's commitment to conducting business in accordance with the highest professional standards.

Delta Electricity has a number of policies in place in relation to recruitment of employees to ensure they have the necessary knowledge, experience and skills to perform the intended role. Delta Electricity also requires psychometric assessments for all Executive positions and their direct reports.

As part of the requirements for the issue of an Australian Financial Services Licence (AFSL), Delta Electricity is required to demonstrate it has appropriate processes and policies in place to ensure that its Human Resources (HR) capacity is compliant with the obligations of the legislation. This includes such areas as probity checks and verifying the skills held by people operating under the AFSL, the ongoing development associated with these staff, and the manner in which Delta Electricity recruits and plans for future staffing needs.

Delta Electricity also has a company standard that defines the approach adopted across the organisation to ensure that Training & Development initiatives are appropriately planned, delivered and recorded, and that appropriate assistance is provided to those undertaking formal study.

Further detail is provided on a commercial-in-confidence basis in Appendices 7 and 8.

2.10 Risk management strategy

Delta Electricity aims to use best practice risk management processes to support and enhance its mission, vision and values and compliance to Australian/New Zealand Standard ISO AS/NZS 31000:2009 Risk Management – Principles and Guidelines.

All employees in Delta Electricity have a responsibility for practicing sound risk management, ranging from strategic issues, operational issues to safety initiatives in the maintenance and operation of the plant. Managers and team leaders at all levels are expected to provide leadership and commitment in implementing and complying with risk management processes and procedures as part of their normal duties.

As a generator in the market, Delta Electricity has well-developed policies and procedures to manage wholesale electricity trading activities. Delta Electricity also recognises the specific risks associated with retailing electricity beyond its existing direct supply customer in NSW and has developed new and amended policies and procedures to address the new risk areas arising from retail activities under an AER authorisation. Policies provide a set of mandatory high level strategies, limits and authorities that establish the overarching principles for control of Delta Electricity's operations in the 'energy markets'. The policies delegate authority from the Board to the Managing Director and the Risk Committee and are reviewed and endorsed annually by the Board.



Delta Electricity's procedures provide a set of mandatory working guidelines, processes, limits and instructions to guide Delta Electricity's Marketing and Finance officers in day-to-day operations in the 'energy markets'. The procedures delegate authority from the Managing Director to Marketing Officers and are approved by the Managing Director.

Further detail is provided on a commercial-in-confidence basis in Appendix 9.

2.11 Compliance and risk management external assurance

At the time of submission of this retail authorisation application, Delta Electricity's external assurance provider had not completed its review. Delta Electricity intends to submit to the AER a letter of endorsement of the compliance and risk management systems and processes when available.

2.12 Industry memberships and accreditations

2.12.1 Austraclear

Delta Electricity is already registered with Austraclear to support settlement activities in the NEM.

2.12.2 Australian Financial Services Licence

Under the Australian Financial Services Licence (AFSL), Delta Electricity has obligations to supply cashflow projections to the Australian Securities and Investment Commission (ASIC) which provide assurance that sufficient funds exist to meet Delta Electricity's financial obligations as and when they arise. As part of the AFSL, Delta Electricity must also be able to pay all debts as and when they become due and meet specific asset level tests and ratios against expected liabilities.

A copy of Delta Electricity's AFSL is provided in Appendix 10.

2.12.3 Quality standards

Delta Electricity's policies, standards, procedures and reference manuals are prepared in accordance with its Business Management System (BMS) quality standards. The BMS framework is structured to comply with the International Standard AS/NZS ISO 9001-2008 Quality Management Systems Requirements.

2.13 Industry arrangements and registrations

2.13.1 AEMO registration

Delta Electricity is a registered Market Generator and Market Customer with AEMO and has access to the relevant market systems and interfaces in place to manage its existing direct supply contract in NSW. Delta Electricity is undertaking discussions with AEMO to confirm if any additional registration requirements are needed and/or access is required for further market administered systems and interfaces.

2.13.2 Metering

Delta Electricity will leverage its existing relationship with metering service providers and commence discussions with relevant parties to provide appropriate metering services where required for additional large customer sites.

2.13.3 Network use of system

Delta Electricity has commenced discussions with relevant electricity network businesses to execute network use of system agreements.



3.0 Financial Resources

Delta Electricity is in a position to meet all applicable statutory and prudential financial requirements to operate with Network Service Providers, the Australian Energy Market Operator (AEMO) and the Australian Securities and Investment Commission (ASIC) and the company is not aware of any factor which would affect the ability to securely finance the activities to be performed under the retail licence authorisation.

3.1 Audited financial statements

Appendix 11 details Delta Electricity's commercial-in-confidence financial accounts for the year ending 30 June 2017. At the time of submitting this application the accounts are draft and unaudited. However, Delta Electricity anticipates final audited accounts will be available by late September 2017.

3.2 Related companies' structure and arrangement

Delta Electricity is part of a broader company structure and group of related companies as detailed in the commercial-in-confidence Corporate Structure outlined in Appendix 12. None of these related companies are applying for, or have retail authorisations.

3.3 Written declaration from Managing Director

Delta Electricity's Managing Director has provided a statutory declaration (refer Appendix 13) that the business will be a going concern and that there are no factors that might impede the business' activities under the retail authorisation in the foreseeable future.

3.4 Written declaration from independent auditors

Please refer to Appendix 14 for a declaration by our independent auditor.

3.5 Access arrangement for additional capital

Delta Electricity's capital requirements for the retail operations have been included in the Retail Business Plan and financial forecasts. Delta Electricity has existing financing arrangements in place that cover the organisation as a whole. It has a working capital facility and sufficient cash reserves in place to support its retail business plan.

3.6 Forecast revenue and expenses

A copy of our five-year financial forecast consistent with our Retail business plan has been provided on a commercial-in-confidence basis in Appendix 4.

4.0 Suitability

4.1 Materials failures, revocation of authorisations and legal actions

Delta Electricity's Managing Director has prepared a written declaration regarding the suitability of the Directors and Executive team to being an authorised energy retailer. In summary, the business is not aware of its Directors and Officers being involved in any:



- material failure to comply with regulatory requirements, laws or other obligations over the previous 10 years, including infringement notices or other enforcement action being taken by a regulatory body, including for its water utility business;
- previously revoked authorisations, authorities or licences held in any industry;
- 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; and
- situation/s where Delta Electricity (or an associate) have previously triggered the Retailer of Last Resort (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.

4.2 Offences and prosecutions

Delta Electricity confirms that none of its Directors or Executive team members or other persons who have significant involvement in Delta Electricity have been involved with any prosecutions under any territory, Commonwealth or foreign legislation, including but not limited to, the Australian Securities and Investment Commission Act 2001 (Cth) and the Corporations Act 2001 (Cth) that are relevant to Delta Electricity's capacity as a holder of a Retailer Authorisation.

4.3 Criminal history checks

Delta Electricity personnel with AFSL responsibilities are subject to police checks.

Other Police checks can be organised and submitted to the AER upon request.

4.4 Written declaration from Managing Director

Delta Electricity's Managing Director has provided a written declaration that members of its management team have not been disqualified from the management of corporations and about the record of bankruptcy of the management team (including in any overseas jurisdiction). Please refer to Appendix 13 for a copy of the written declaration.

4.5 Names and addresses of key officers

Please refer to Appendix 15 provided on a commercial-in-confidence basis, for relevant details.

4.6 Probity policies and procedures

Delta Electricity has a number of policies and procedures to support probity and conduct. In particular there is a Code of Conduct, Conflict of Interest Standard, Competition and Consumer Act Compliance Policy and Corruption Prevention Policy. Copies of these are included as commercial-in-confidence in Appendix 16.



5.0 Appendices

Description	Commercial-in - Confidence
Appendix 1 – Certificate of Registration	N
Appendix 2 – Staff Numbers by Business unit	Y
Appendix 3 – Key Staff Summary of Qualifications and Experience	N
Appendix 4 – Business Plan & Financial Forecast	Y
Appendix 5 – Compliance Plan and Procedures	Y
Appendix 6 – Complaints Handling and Dispute Resolution Procedures	Y
Appendix 7 – Recruitment and Selection Policy	Y
Appendix 8 – Training Policy and Procedures	Y
Appendix 9 – Risk Management Policy and Procedures	Y
Appendix 10 – Australian Financial Services Licence	N
Appendix 11 – 2017 Financial Statements	Y
Appendix 12 – Corporate Structure	Y
Appendix 13 – Director and Officer’s Statutory Declarations	Y
Appendix 14 –Independent Auditor’s Declaration	Y
Appendix 15 – Officers’ Names and Residential Addresses	Y
Appendix 16 – Probity and Conduct Related Policies (e.g. Code of Conduct, Conflict of Interest Standard)	Y