

Discover Energy Pty Ltd

AER Retailer Authorisation Application (Gas)

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Introduction

This is a gas retail authorisation application by Discover Energy Pty Ltd (ABN 20 619 204 750) (**Discover Energy**) lodged with the Australian Energy Regulator (**AER**) for the sale of gas in state jurisdictions that have adopted the National Energy Consumer Framework.

Discover Energy is an Australian proprietary company, limited by shares (see **Annexure A** for Certificate of Business Registration).

This application consists of:

- · Part One providing General Particulars of Discover Energy;
- Part Two providing the Organisational and Technical Capacity;
- Part Three providing the Company's Financial Capacity; and
- Part Four providing our Suitability Criteria.

A number of relevant attachments are provided and referenced throughout this application document. Documents or attachments clearly marked as 'Commercial-in-confidence' do not form part of the public component of this application.

1. Part One: General Particulars

Legal name:

The applicant is Discover Energy Pty Ltd (ABN 20 619 204 750).

Trading name:

As above.

ABN:

20 619 204 750

ACN:

619 204 750

Registered

19/05/2017

Business address:

Suite 2, Level 23, 111 Pacific Highway, North Sydney 2060

Postal address:

PO Box 665, North Sydney, NSW 2059

Contact person:

Anson Zhang

Chief Executive Officer

Suite 2, Level 23, 111 Pacific Highway

North Sydney, NSW 2060

Email: support@discoverenergy.com.au

Telephone: 1300 946 898

Form of energy:

Gas

Commencement date:

4th Quarter 2019

Jurisdictions:

All AER state jurisdictions that have adopted the National Energy

Consumer Framework.

1.1 Nature and scope of operations

Discover Energy is an all in one energy provider, with a mission to lead the evolution of sustainable, smart and digital energy.

Partnering with One Stop Warehouse (**OSW**), one of Australia's largest solar and storage distribution companies, our intention is to be able to:

- (a) provide households with affordable solar panels and storage units,
- (b) power their households with competitive electricity and gas plans,
- (c) encourage households to use and generate their own clean energy, and
- (d) enable households to monitor and use their energy in the most efficient ways via a fully in-house Discover Energy developed monitoring app, Discover Energy *Insight*.

Working with an established network of channel partners consisting of installers and retailers, Discover Energy will focus on attracting specific market segments including encouraging the take-up of solar PV and storage systems by offering competitive electricity price plans with attractive feed-in tariffs and bundling with natural gas in its portfolio of retail offers.

The aim is to deliver a one-stop customer experience and service providing energy-related products and services, achieving the Company's aim of generating clean and green energy, by targeting individual households one suburb at a time.

Discover Energy aims to be a long-term sustainable dual fuel energy retailer and intends to achieve this through continuous product and process innovation that will afford greater consumer choice, protection and benefits. In providing these energy products and services to its customers, Discover Energy will seek to uphold the objective of the National Energy Retail Law of promoting efficient investment in, and efficient operation and use of, energy services for the long-term interests of consumers of energy with respect to price, quality, safety, reliability and security of supply of energy.

1.2 Type of customers

Discover Energy will predominantly market to residential households, with a small number of large customers to be added in time.

1.3 Previous unsuccessful licence applications

Discover Energy has not previously had any unsuccessful licence applications in Australia.

1.4 Licences held by Discover Energy and associates

On 23 January 2018, the AER approved an electricity retailer authorisation application from Discover Energy under the National Energy Retail Law.

2. Part Two: Organisational and Technical Capacity

2.1 Details of previous experience as an Energy Retailer

Discover Energy is a recent entrant and participant in the energy retail sector. It has however assembled a management team with extensive industry skills and experience covering commercial, operational, customer service and compliance aspects of the energy retail business. A number of our management and operational staff have previously worked for other energy retailers.

Discover Energy will take an integrated and co-ordinated approach to incorporate solar and storage in its energy retail activities to drive its commitment to maintaining long term environmental sustainability.

Our management team also has extensive skills and experience in the solar photovoltaic and storage business.

2.1.1 Date and location of operations

On 23 January 2018, the Australian Energy Regulator (AER) approved Discover Energy's electricity retailer authorisation. Discover Energy's market operations started and electricity offers were launched on 1 July 2019 from our offices in Queensland and Sydney.

We have acquired a small number of customers who are open to technological innovations and solutions, and it remains our mission to build our business model capitalising on new technologies and investment opportunities benefiting the customers.

2.1.2 Form of energy sold

Discover Energy has so far offered electricity price plans to customers by targeting specific segments of the market while at the same time encouraging the take-up of solar PV and storage systems by these customers.

Discover Energy currently offers competitive electricity price plans with attractive feed-in tariffs. It will offer competitive electricity and gas bundled plans upon the granting of its gas retailer authorisation.

2.1.3 Scale of operations

The principal activities of Discover Energy consist of retailing energy and energy products, including solar, battery and energy management and control systems to residential households and small businesses.

Discover Energy will start from a relatively small and conservative operational footprint and then grow over the medium to longer term, with revenue forecast to include gas retailing in the AER jurisdictions and launch of electricity and gas retailing in Victoria.

A Business Plan and detailed revenue forecast for the next five years have been included in Annexures D1 and D2, provided on a commercial-in-confidence basis.

2.1.4 Description of how our retail activities are conducted

In the past few months of retail market entry, Discover Energy has targeted residential customers with existing solar systems already installed in their homes. This careful and conventional approach is to allow Discover Energy to develop a stable number of customers to manage load capacity and mitigate wholesale risks.

We leverage our long-term partnerships with solar and storage system providers and installers for channel access and to introduce Discover Energy's energy offers including electricity retail plans.

For customers with solar and storage systems already installed in their homes, Discover Energy has been promoting its in-house developed application called *DE Insight*, which is an innovation-patented app that helps customers monitor their household energy usage. This app will also eventually help customers reduce their household electricity bills.

2.2 Details of any other relevant retail or energy market experience

Discover Energy has a well-developed understanding of the energy market and the various regulatory obligations required of an authorised retail licence holder. Discover Energy's experience and technical capability will be achieved through internal resource development, strategic recruitment over time and engagement of experienced and reputable outsourced system and service providers.

With the same Directors as OSW on the Executive Team of Discover Energy, Discover Energy is able to draw on the business experience and skills of OSW, share its resources and network of contacts, and create synergies beneficial to both businesses.

OSW was first established in Western Australia in January 2013, selling photovoltaic products. Within 6 years, it has now become one of Australia's largest wholesale suppliers of solar PV panels, solar inverters, components and storage systems, with offices and warehouses in New South Wales, Victoria, Queensland, and South Australia. In 2018, it was ranked number 24 out of Australia's top 100 fastest growing companies by the Australian Financial Review.

Besides an extensive network of OSW's solar retailers and installers with which Discover Energy will be able to form channel partnerships with, Discover Energy is also able to access solar and storage systems at competitive prices (via OSW) to offer to its energy customers.

2.3 Organisational Structure

Discover Energy's organisational structure (including key areas of energy retail and its capability) is detailed in **Annexure B**, provided on a commercial-in-confidence basis.

The following table shows the key business functions, roles currently in place and external support partners.

Business Function	Roles (Internal)	External Support Partners
Executive Team	Chief Executive Officer	
Executive realii	Chief Operations / Technology Officer	
	Strategy Development Manager	
	National Sales Manager	
Strategy & Sales	Business Development Managers	
P	Marketing Executive	4 4 4
		Channel Sales Partners
Operations	General Manager, Operations	A
o per uniono	Business Manager, Product & Compliance	
	Finance Manager	
Finance	Finance Executive	
T. H. G. T.	Junior Market Trader	
	Comment of the second	Commonwealth Bank
	Project Director	
Technical	IT Support	
	 H. M. G. H. G. H.	System Partners
Business Function	Roles (Internal)	External Support Partners
Human Resources	Human Resources Manager	

Please refer to **Annexure C**, provided on a commercial-in-confidence basis, for details on key partners.

2.4 Key Employees

2.4.1 Mr. Anson Hongwei Zhang (Chief Executive Officer)

MBA (UTS)

Founder and Chief Executive Officer of One Stop Warehouse (OSW), Green Deal, and Discover Energy. An entrepreneur with acute business acumen, Anson is a well-known figure in the photovoltaic materials and solar industry, having organically grown OSW from a start-

up company to a \$390 million dollars annual turnover business with 23% market share across Australia in just 6 years.

In 2018, Anson was also nominated a Finalist (Energy category) in the prestigious Executive of the Year Awards 2018.

2.4.2 Mr. Jeff Chang Yu (Chief Operations / Technology Officer)

MIT (UNSW)

Co-Founder and Chief Operations (Technology) Officer of One Stop Warehouse (OSW), Green Deal and Discover Energy.

Jeff has over 16 years' experience in the IT space, working with multinationals in developing software applications focused on building and integrating systems and processes that increase the efficiency of business operations and customer experience.

With OSW, Jeff has led teams in IT, R&D and sales, and developed data and trading platforms that have brought about significant improvements in management information reporting, business analytics and business and personnel performance monitoring.

Jeff is leading the R&D and IT team for Discover Energy, spearheading its R&D and IT developments.

2.4.3 Ms. Sunny Lee (General Manager, Operations)

Masters (Accounting & Finance), Macquarie University BSc (Accounting), Central Queensland University Qualified CPA Member of CPA Women in Business Discussion Group

Sunny has over a decade of experience in the electricity and gas retailing and in the telecommunications industry, specialising in commercial, financial and operational management.

In her previous role with CovaU Energy, Sunny was involved in organisational change management, strategic planning, operational development, regulatory compliance, contracts and relationship management, organisational sustainability development and financial and profit centre management.

2.4.4 Ms. Beth Corcoran (Business Manager, Product & Compliance)

Beth has over 8 years' extensive experience in the energy industry for both electricity and gas, specialising in product development and management, industry compliance, B2B operations and team coaching and development.

Beth has a high-level knowledge and hands-on experience of the energy industry's market procedures and guidelines, National Energy Rules and Laws, energy retail compliance requirements and obligations, and network tariffs and MSATS management. In her time in the industry with another energy retailer, Beth has been extensively involved and successfully managed the compliance and reporting requirements set by industry regulatory and other related industry audit bodies. Her understanding of the regulatory frameworks

has allowed efficiency in retail product and pricing development, analysing and reviewing product and pricing trends and ensuring margin management and control.

2.4.5 Mr. Anthony Buckwell (Project Director)

Bachelor of Engineering (Microelectronics, Comms)

Anthony has over 20 years of technical and engineering experience in true leading-edge technologies, firstly on the 3G mobile telecommunications networks and then followed by time in the renewable energy sector for the last 12 years.

He also holds a full CEC Design and Installation accreditation for On Grid and Standalone Power Systems, as well as an Electrical Mechanics licence. He has also worked for CSIRO as a research engineer in the field of low power communications, telemetry and monitoring systems.

2.4.6 Mr. Ian Gittus (Strategic Development Manager)

Bachelor of Arts (Political Science)

lan has over 20 years' experience in environmental policy and advocacy with a focus on carbon emissions reduction. Ian has worked for environmental NGO's and coordinated political campaigns for advocacy organisations and political parties.

For the past 10 years, Ian has run a successful solar and battery business, and has a background in Energy Auditing and building efficiency. Ian's main passion is the reduction of carbon emissions and leading the digital revolution of our power networks.

Where further specific skill and experience gaps have been identified and are required for operating and growing its retail business over time, Discover Energy will undertake external recruitment for suitably qualified individuals.

2.5 External third-party skills and involvement

Discover Energy will be engaging partners and suppliers with skills and experience in the energy market where required.

Discover Energy has a Licence and Support Agreement with Agility CIS Pty Ltd to assist with invoicing and customer management. A strategic advisory and consultancy agreement has also been entered into with Sustainable Edge Pty Ltd, a firm highly experienced in the utility sector covering electricity, gas, renewable energy & telecommunication services.

A detailed list of current providers and partners involved in Discover Energy is provided on a commercial-in-confidence basis in **Annexure C**.

2.6 Business Plan

Annexure D1 details on Discover Energy's Business Plan, provided on a commercial-inconfidence basis.

Discover Energy has access to financial resources via internal and third-party funding sources. It has assembled a strong and capable management team to ensure that its long-term business objectives and goals are achieved.

Discover Energy's business financial forecast, in line with its business plan, is provided on a commercial-in-confidence basis in **Annexure D2**.

From its ongoing research and development in conjunction with OSW and engagement with a number of external providers over time, Discover Energy understands the key risks of operating as an energy retailer and the need to adopt a pragmatic and prudent approach in its operations including customer acquisition and retention. It will focus on delivering on its value proposition of innovative product mix and service to its customers while monitoring and mitigating critical wholesale and retail operational risks.

2.7 Compliance Strategy

The Board of Discover Energy recognises that an effective compliance management system, as defined in AS ISO 19600:2015, is central to the organisation's strategy and achievement of its business and financial objectives.

Discover Energy is committed to an effective compliance program implemented in accordance with AS ISO 19600-2015. Discover Energy's Compliance Policy, provided on a commercial-in-confidence basis in **Annexure E**, demonstrates the extent to which the standard has guided its approach to business compliance.

The Discover Energy team has adopted and implemented a range of measures to ensure compliance with regulatory obligations. Discovers Energy's regulatory obligations include but are not limited to those under the Energy Laws (including the National Energy Retail Law, National Energy Retail Regulations and various instruments), the *Telecommunications Act* 1997, the *Do Not Call Register Act* 2006 and the Australian Consumer Law (as set out in Schedule 2 to the *Competition and Consumer Act* 2010).

The Board of Discover Energy has overall responsibility for setting and overseeing the corporate governance and compliance standards that are implemented by the Compliance Committee, consisting of a member of the board, our Compliance Lead/Manager and business unit or department managers.

Discover Energy ensures compliance by establishing and adopting the following:

- <u>The Compliance Committee</u>: Responsible for developing and implementing the compliance program via the development of policies, procedures and training programs.
- <u>Compliance Lead/Manager and all personnel:</u> Responsible for the day to day oversight of the compliance program of Discover Energy.
- <u>External Advice:</u> Discover Energy, as part of its compliance program, obtains advice on compliance and legal issues from a number of qualified external providers on an "asrequired" basis.
- <u>Information System and Technology</u>: Discover Energy implements a range of technological solutions that aid in the organisation's compliance and implementation of the compliance program. These include its internal monitoring system that tracks regulatory obligations and assigns various controls and resources against these obligations.
- <u>Documentation</u>: Discover Energy has developed procedures and policies related to operational processes and document management in order to ensure regulatory compliance. These documents, including training, are provided to employees to ensure implementation of sound compliance practices across the business.

- <u>Compliance Risk Assessments</u>: Discover Energy actively seeks to identify and reduce
 the likelihood of breaches of regulatory obligations. A Compliance Risk Assessment is
 scheduled on a timely and relevant basis in examining and assessing all applicable
 regulatory obligations, the consequences and likelihood of a breach and appropriate
 controls put in place to mitigate the risks by business impact and priority.
- <u>Training and Assessment</u>: The aim of compliance training and assessment is to reinforce in all staff the understanding that regulatory compliance is core to Discover Energy's operations. External training providers will be utilised where appropriate.
- Qualified Staff: Appropriately qualified staff will be employed.
- Monitoring and Reporting: Any compliance breaches will be monitored, resolved and reported in accordance with the Policy and Discover Energy's reporting obligations.

Attached are Discover Energy's compliance related policies and procedures:

- Annexure E: Compliance Policy (provided on a commercial-in-confidence basis);
- Annexure E1: Compliance Reporting Procedure (provided on a commercial-in-confidence basis);
- Annexure E2: Code of Business Conduct;
- Annexure E3: Hardship Policy;
- Annexure E4: Complaints Policy;
- Annexure E5: Summary of Rights and Obligations
- Annexure E6: Recruitment and Selection Policy (provided on a commercial-in-confidence basis);
- Annexure E7: Onboarding and Induction Policy (provided on a commercial-in-confidence basis):
- Annexure E8: Employee Referral Program (provided on a commercial-in-confidence basis);
- Annexure E9: Equal Employment and Opportunity Policy (provided on a commercial-inconfidence basis);
- Annexure E10: Exit Policy (provided on a commercial-in-confidence basis);
- Annexure E11: Grievance Policy (provided on a commercial-in-confidence basis);
- Annexure E12: Internal Transfers and Promotions Policy (provided on a commercial-inconfidence basis);
- Annexure E13: Privacy Policy; and
- Annexure F: Risk Management Policy (provided on a commercial-in-confidence basis)

The guiding principles for Discover Energy's complaints management program are based on AS ISO 10002:2006. Under its Complaints Policy, customers have a right to lodge a complaint at any time.

Discover Energy is committed to freely receiving and resolving complaints in an accessible and transparent way. In all instances, Discover Energy will:

- freely accept complaints lodged on our website, in person, by telephone, facsimile, email or letter;
- acknowledge any complaint received as soon as possible;
- begin an investigation into the reasons for a complaint within 24 hours of acknowledgment;
- keep the complainant updated about the investigation and any proposed resolution;
- notify the complainant as soon as possible of the outcome of internal investigation and proposal for resolution; and

• provide the complainant with the option of an internal review of their complaint if they are unsatisfied with the outcome of the investigation or the proposed resolution.

2.8 Risk Management Strategy

AS ISO 31000:2009 provides a generic guide for managing risk. This standard may be applied to a wide range of activities, decisions or operations. Discover Energy has adopted this standard as guidance for addressing risks.

The Risk Management Policy is provided in Annexure F on a commercial-in-confidence basis.

To be effective, risk management, like compliance, must become part of an organisation's culture. It should be embedded into the organisation's philosophy, practices and business processes rather than be viewed or practised as a separate activity.

The Board of Discover Energy has overall responsibility for ensuring that there is a sound system of risk management across the business.

The Board is also responsible for defining the overall risk appetite of the business, and for approving policies and ensuring that these are implemented. The Board approves the Risk Management Policy and in the normal course of business, provides approval for changes and updates to the policy, on a case-by-case basis.

2.9 Details of External Audit of Compliance and Risk Strategy

Discover Energy's Compliance Policy and Risk Management Policy have undergone external review. Changes recommended by the external provider have been implemented and incorporated into the documents attached to this application. This is provided on a commercial-in-confidence basis in **Annexure G**.

2.10 Additional Risk Management Information

2.10.1 Retail Contracts

Discover Energy's Retail Contract with its Terms and Conditions is provided in Annexure H. This can also be assessed via Discover Energy's webpage https://s3-ap-southeast-2.amazonaws.com/discover-energy/assets/pdf/GeneralTerms.pdf

2.10.2 Insurance

Discover Energy will ensure the relevant insurance are put in place for full coverage in its operations:

- Public Liability Insurance
- Management Liability Insurance
- Workers Compensation
- Commercial Credit Insurance
- Business Interruption
- Business Assets (to be covered by industrial risk insurance)
- Product Liability Insurance

2.11 Ombudsman Scheme Memberships

Discover Energy applied and became a scheme member of Energy and Water Ombudsman of New South Wales on 28 February 2019. Attached and marked **Annexure I** is an attachment confirming Discover Energy's scheme membership status from the EWON, provided on a commercial-in-confidence basis.

Discover Energy also became a scheme member of Energy and Water Ombudsman Queensland in 2018 https://www.ewoq.com.au/energy-and-water-suppliers, and has been in contact with Energy and Water Ombudsman of South Australia (EWOSA) to understand the requirements for membership of the respective schemes.

2.12 Industry and Market Participation Agreements

2.12.1 AEMO Registration

Discover Energy is an authorised electricity retailer in the AER jurisdictions and is registered with AEMO as a market participant. It will engage with AEMO for Short Term Trading Market (STTM) participation and access to gas market systems and services upon becoming an authorised gas retailer.

2.12.2 ASX Austraclear Participation

Discover Energy is a registered participant with Austraclear and a current user of its settlements system for settling NEM transactions.

2.12.3 Gas Purchasing and Storage

Discover Energy will access gas supply directly from the STTM and enter into supply arrangements with producers, other retailers and pipeline and storage facility operators.

2.12.4 Distributor and Meter Service Providers

Discover Energy has entered into an agreement with Jemena in NSW and will also engage relevant QLD and SA gas distributor companies responsible for gas distribution and metering services.

2.12.5 Australian Financial Service Licence (AFSL)

Discover Energy intends to become an AFSL holder to trade in energy financial derivatives for managing wholesale and market-related risks.

It is currently in discussion with an external service provider to progress on its AFSL application.

3. Part Three: Financial Resources

3.1 Supporting Financial Details

Provided in **Annexure J** is a document confirming Discover Energy's current financial position, provided on a commercial-in-confidence basis.

Discover Energy's business forecast for the next five years are provided in Annexure D2.

3.2 Group Structure

Annexure K, provided on a commercial-in-confidence basis details Discover Energy's ownership structure.

3.3 Declaration from CFO, CEO or Director

Written declarations from Discover Energy's CEO in **Annexures L** and **L1** provided on a commercial-in-confidence basis, confirm the company's current financial position, and that no businesses, subsidiaries or related entities of Discover Energy have been involved in any past or present bankruptcy proceedings in Australia or in any overseas jurisdiction.

3.4 Declaration from Independent Auditor

Annexure M, provided on a commercial-in-confidence basis, contains a written declaration from an independent auditor confirming the company's current financial position and capacity.

3.5 Bank Guarantees or Arrangements for Additional Capital

Letters of Support from external parties and a copy of current bank statement of Discover Energy are detailed in **Annexure N** and **Annexure O**, provided on a commercial-inconfidence basis.

3.6 Revenue and expenses forecast

Attached in **Annexure D2** is Discover Energy's financial forecast, provided on a commercial-in-confidence basis.

4. Part Four: Suitability Criterion

Discover Energy is a fit and proper entity to hold a retail authorisation. Neither itself and its related body corporates, officers or associates have had any criminal or civil convictions.

Discover Energy will be fully cooperative and comply with any AER request for probity checks to be undertaken on its key officers.

4.1 Material Failures

Discover Energy, its associates, officers, businesses where officers have held an officer position, or other entity that exerts control over Discover Energy, have not been the subject of 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.

4.2 Revocations of Authorisations, Authorities or Licences

Discover Energy, its associates, officers, businesses where officers have held an officer position, and other entities that exert control over Discover Energy have not held authorisations, authorities or licences that have been revoked. **Annexure P**, provided on a commercial-in-confidence basis is a signed declaration from the CEO.

4.3 Regulatory Breaches

Discover Energy, its associates, officers, businesses where officers have held an officer position, or other entities that exert control over Discover Energy have not been a party to legal action taken in relation to any regulatory breaches.

4.4 RoLR Provisions

Discover Energy, its associates, officers, businesses where officers have held an officer position, or other entities that exert control over Discover Energy have not triggered the RoLR or equivalent provisions.

4.5 Offences or Prosecutions against Entity

There have been no offences found nor successful prosecutions under any territory, state, Commonwealth or foreign legislation against Discover Energy, its associates, officers, businesses where officers have held an officer position, and other entities that exert control over Discover Energy.

4.6 Offences or Prosecutions against Officers

There have been no offences found nor successful prosecutions under any territory, state, Commonwealth or foreign legislation against any current director or key personnel of Discover Energy. Annexure Q, provided on a commercial-in-confidence basis is a signed declaration from the CEO.

4.7 Written Declaration from CEO

Annexure R is a declaration from Discover Energy's CEO (provided on a commercial-inconfidence basis), confirming:

- that no members of the Discover Energy management team have been disqualified from the management of corporations;
- that there is no record of bankruptcy events or proceedings on any member of the Discover Energy management team (including in any overseas jurisdiction).

4.8 Officers' Full Names and Addresses

Annexure S, provided on a commercial-in-confidence basis, contains the contact details of key Discover Energy officers.

4.9 Policies and Procedures on Officers' Probity and Competence

Please find attached documents which are relevant to this component of the application:

- Annexure E: Discover Energy Compliance Policy;
- Annexure E2: Discover Energy Code of Business Conduct; and
- Annexure E6-E12: Discover Energy Human Resources and Employee Policies

List of Annexures:

Document	<u>Description</u>	Confidential
Annexure A	Certificate of Business Registration	No
Annexure B	Discover Energy Organisational Chart	Yes
Annexure C	List of Providers and Suppliers – Support Services	Yes
Annexure D1	Business Plan	Yes
Annexure D2	Financial Forecast 2019 - 2023	Yes
Annexure E	Compliance Policy	Yes
Annexure E1	Compliance Reporting Procedure	Yes
Annexure E2	Code of Business Conduct	No
Annexure E3	Hardship Policy	No
Annexure E4	Complaints Policy	No
Annexure E5	Summary of Rights and Obligations	No
Annexure E6	Recruitment and Selection Policy	Yes
Annexure E7	Onboarding and Induction Policy	Yes
Annexure E8	Employee Referral Program	Yes
Annexure E9	Equal Employment and Opportunity	Yes
Annexure E10	Exit Policy	Yes
Annexure E11	Grievance Policy	Yes
Annexure E12	Internal Transfers and Promotions	Yes
Annexure E13	Privacy Policy	No
Annexure F	Risk Management Policy	Yes

Document	Description	Confidential
Annexure G	Audit Verification Letter	Yes
Annexure H	Retail Contracts Terms and Conditions	No
Annexure I	Ombudsman Scheme Membership NSW	Yes
Annexure J	Financial Statement	Yes
Annexure K	Company Structure and Ownership	Yes
Annexure L & L1	CEO Declarations	Yes
Annexure M	External Auditor Declaration	Yes
Annexure N	Bank Loan Offer from Commonwealth Bank of Australia	Yes
Annexure O	Bank Statement	Yes
Annexure P, Q &	CEO Declarations	Yes
Annexure S	Officers' Contact Details	Yes