



Application for Retail Authorisation

Electricity | September 2017

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1. Introduction

Starcorp Energy Pty Ltd (Starcorp Energy) is private Australian based company, seeking to establish an electricity retail business on Australia's east coast with primary concentration in Queensland and New South Wales and plans for future expansion into Victoria.

This documents sets out the information as required under the Australian Energy Regulator's Retailer Authorisation Guidelines, as well as the Retail Law and rules.

Sections 2 to 5 provide information on our corporate structure as well as our technical and financial capacity of operating in energy retail markets.

Section 6 contains the list of attachments to this application. Those attachments are considered commercial in confidence and are provided to support this application. They are not for general disclosure.



2. General Particulars

2.1 LEGAL NAME & ACN

Starcorp Energy Pty Ltd
ACN 620 151 304

2.2 REGISTERED BUSINESS ADDRESS

Level 24, 111 Eagle Street, Brisbane QLD 4000

2.3 NOMINATED CONTACT AND DETAILS

Primary Contact: Mr Perry Stahmer, CEO, Head of Retail Development & Co-Founder
Phone: 0411 691 528
Email: perrystahmer@starcorpenergy.com.au

Secondary Contact: Ms Gina Bozinovski, Company Secretary and Legal Adviser
Phone: 0456 600 151
Email: gina.bozinovski@brhlawyers.com.au

2.4 FORM OF ENERGY

Energy: Starcorp Energy seeks to retail electricity.

2.5 NATURE AND SCOPE OF OPERATIONS

With Strata communities representing approximately 11% of a \$37 billion Australian electricity market (Source: AEMO), and with the 2015 government regulation changes in Qld, Starcorp Energy will deliver a clear solution and services to greenfield and urban infill communities. Starcorp Energy's vision is to be the utility that innovates, inspires and creates communities of the future. Starcorp Energy's mission is to create next generation utilities that enable self-sufficient communities that exceed the expectations of our customers through sustainable innovation, leadership and smart thinking.

Starcorp Energy's business plan details the intention of our embedded network solutions, which consist of bulk supply services (on-selling), to a higher level of compliance and regulation to the market. Starcorp Energy will hold the parent retail account in place of the on-site body corporates, the Starcorp Energy offering will be an all-inclusive product, physical equipment, site energy management, billing service and financial mechanism including debt responsibility, this structure will exclude Strata Management from conducting business in the usual on-selling exemption space.

A body corporate with an existing embedded network is now required to obtain an exemption to be an on-seller of electricity. This means the Body Corporate would be exposed to all the risks as well as undertaking the administration burden, being suddenly responsible to all obligations including customer policies, such as life support registration, and general supply and debt responsibilities.

It is Starcorp Energy's aim to de-risk a body corporate from its on-selling obligations.

2. General Particulars

Starcorp Energy will offer a simple, hassle free service for a community with an existing embedded network to a full retail service. This switch will bring with it the same great level of savings as well as an improved standard of service. Starcorp Energy is committed to providing retail services to residential customers at the level they would expect from a traditional retailer. Starcorp Energy will achieve this by providing smart, clean, multi- utility infrastructure solutions to developers and body corporate committees/owners corporations.

Our three main product offerings will be retrospective fittings, existing “bulk” electricity communities and greenfield opportunities. Starcorp Energy will create simpler relationships with developers, body corporate committees, owners corporations and end customers alike, and provide greater protections to end customers.

For more details on Starcorp Energy’s business model,

See **Attachment A – Starcorp Energy Business Plan**.

2.6 JURISDICTIONAL

Starcorp Energy will commence operations in Queensland and NSW, however, will move into other contestable jurisdictions including, Victoria over time.

2.7 INTENDED DATE OF COMMENCEMENT

Commencement Date: Subject to authorisation, Starcorp Energy intends to commence retailing electricity on and from 1 December 2017. 1 December 2017.

2.8 STARCORP ENERGY CUSTOMERS

Starcorp Energy will be retailing to small residential customers within strata communities. These customers are defined as off-market small customers (consuming <100MWh/pa). These communities can also contain small commercial businesses that we do not expect will consume more than 100MWH/year.

Starcorp Energy is committed to providing the highest level of consumer rights and to promoting consumer rights under the Retail Law including:

- a) offering fair contracts with clear terms and conditions so customers can understand the energy offer;
- b) providing a written summary of the offer (Energy Price Fact Sheet) when marketing to customers;
- c) notifying customers of any changes to their contract, including the price;
- d) allowing consumers to exit a contract without penalty within the 10-day ‘cooling off’ period after signing;
- e) including clear information on bills so customers can understand the cost of their energy service;
- f) maintaining a ‘no contact’ list so that energy customers can request that salespeople do not visit;

2. General Particulars

- g)** offering flexible payment options;
- h)** offering hardship programs and tell customers about them if the retailer thinks they are having difficulties paying their bill;
- i)** not disconnecting customers for non-payment if they are participating in hardship programs, or meeting agreed payment plans, or the customer has agreed to repay the amount owing and it is less than \$300;
- j)** providing information on how customers can resolve problems with their energy service;
- k)** advising customers about the availability of government funded energy rebates, concessions or relief schemes.

Starcorp Energy is also committed to upholding the highest standards under the Australian Consumer Law and related legislation.

3. Organisational and Technical Capacity

3.1 PREVIOUS EXPERIENCE AS AN ENERGY RETAILER

Starcorp Energy is a new business start-up established for the purpose of providing retail electricity into Queensland, New South Wales and Victoria, and as such, has no direct experience as an energy retailer.

Starcorp Energy will utilise our extensive knowledge and contacts in the retail market as outlined in the business plan and officer qualifications, technical skills and experience.

3.2 OTHER RELEVANT EXPERIENCE

Starcorp Energy key personal bring to the market significant mix of experience including retail experience within telcoms and energy industries conducting over ten of thousands energy/telcoms consumer audits through out Qld and NSW that involve analysis of clients' agreements, pricing, providing new retail contracts and billing to retailer consumers.

In addition, the directors and executives have proven success in building and operating compliant businesses in highly regulated industries, and the executive team has considerable hands on operational and customer contact experience. Collectively, the core management team possess in depth knowledge and application of governance, risk management and compliance.

Starcorp Energy will be directly leveraging these internal skills, knowledge and experience from its executive team and that of the recently recruited external energy consultants to support and drive the growth and success of its energy retail business.

3.3 EMPLOYEES AND OUTSOURCED FUNCTIONS

Starcorp Energy will have the following employees or engaged contractors to provide the following activities:

- Managing Director
- Chief Operating Officer
- Compliance (Next Business Practice)
- Legal (Broadley Rees Hogan)
- Customer Services, Operations and onboarding
- Billing
- Sales - BDM
- Accounts (UHY Haines Norton)
- Project Management Installation
- Energy Consultant

All retail activities including marketing, sales, meter data collection, billing, and customer service will be carried out internally.

Starcorp energy has brought into the business individuals and businesses with a combined total of over 75 years experience in the Energy industry.

Summary of other key personal qualifications and experience is detailed in our Business Plan.

3. Organisational and Technical Capacity

3.4 ORGANISATIONAL CHART

See Attachment B - Organisational Chart

3.5 SUMMARY OF OFFICER QUALIFICATIONS, TECHNICAL SKILLS AND EXPERIENCE

Perry Stahmer, CEO - Chief Executive Officer and Co-Founder

Perry Stahmer is the chief executive officer, head of retail development and co founder of Starcorp Energy.

He has had more than 11 years retail experience, almost 4 years experience in the electricity retail sector and 8 years retail telecoms experience.

Perry has worked with two electricity retailers. The first tenure being with Victoria Electricity. Perry was responsible for the QLD region spanning seven channel partners with each business partner having 30 – 50 staff. Perry was responsible for delivering a Queensland business case, go-to-market-plan, sales, marketing, pricing, bill analysis, customer churn, compliance, compliance reporting, billing, recruitment, retail customer service and overall financial viability.

During this time Perry was directly responsible for more than 72,000 residential and small to medium businesses changing their electricity retailer. In that time he delivered a robust compliance framework and processes to deliver the highest levels of customer satisfaction.

The second tenure with Locality Planning Energy, Perry had National responsible for recruiting, training, project management, coaching, sales, marketing, analysing competitor trends, pricing strategies, bill analysis, branding, external/internal material, retail customer service, billing, compliance in line with Queensland transitioning to the National Energy Retail Rules and Law on July 1, 2015. Presenting and maintaining relationships with body corporate managers, body corporate committee's, developers and key institute partners re embedded electricity solutions which directly resulted in over 6,000 customers joining an embedded network within their community.

Perry also successfully established a Telecoms National Dealership partnership with Telstra, providing fixed line and broadband internet services. During this time over 110,000 retail customers were serviced which involved, quarterly compliance and financial reporting both internally and externally, billing systems, bill analysis, retail customer service.

In addition to Perry's retail and energy experience, Perry has 11 years experience in corporate senior management, As well as owning and operating his own business for several years, overseeing departments of, customer service, telemarketing, sales, administration, compliance, accounts and project management. (See attachment T for further details).

Perry has also studied Management and Marketing at Deakin University gaining a High Distinction and Credit respectively.

3. Organisational and Technical Capacity

Darren Stahmer, COO - Chief Operating Officer and Co-Founder

Darren Stahmer is the chief operating officer and co-founder of Starcorp Energy. Darren has over 20 years retail experience. He has extensive knowledge and expertise in the energy and telco markets, both highly regulated and compliant focused industries. He established and ran companies in the energy saving renewable energy markets for over 12 years and ran businesses in the telco industry for over 8 years. Darren has built teams of over 80 staff for call centre customer service operations as well as front line sales to assist clients save on electricity costs through the installation of energy saving products. Particular segments of the market which Darren team focused was on hotels, motels, caravan parks, body corporates and retail consumers.

Darren Stahmer procured energy saving products for the Australian market and invested to have the products certified with SAI Global. The products were registered with the Certificate of Conformity, Standards Mark License and the Australian Standards Water Mark. Once these licenses were obtained, the products were then registered with the Office of Renewable Energy Regulator (**ORER**). Darren's company through the registration of these products with ORER is able to submit Small Technology Certificates (STC's) on behalf of customers.

As mentioned, Darren Stahmer owned and operated telecom companies on behalf of Telstra and IPrimus. The company owned by Darren focused on the small to medium enterprises. In this highly regulated industry Darren oversaw the implementation of particular procedures and processes to reflect the requirements under ISO 9001. The company was issued with Quality Management Systems certification from SAI GLOBAL certified ISO 9001. With over 6000 new retail customers acquired each month, relevant quarterly compliance and financial reporting was a requirement. Billing systems had to be maintained with a significant customer service team providing on call bill analysis and customer service. (See attachment T for further details)

Gina Bozinski, Company Secretary

Gina Bozinski - is a qualified lawyer holding a Master of Laws from University of Melbourne. Gina's experience includes in house counsel at Actew-AGL, advising all aspects of regulatory and business environment in respect of energy retailing, water and telecommunications. Gina is admitted to practice in the high court of Australia, the Supreme Court of Queensland and the Supreme Court of the ACT.

3.6 PROFESSIONAL SERVICES

In addition to the directors and key staff as outlined in the business plan, Starcorp Energy has engaged with key professional service businesses to support and partner with their on going business.

LEGAL

Broadley Rees Hogan lawyers are Starcorp Energy's legal advisors, led by Gina Bozinovski.

3. Organisational and Technical Capacity

ACCOUNTS

UHY Haines Norton Chartered Accountants, led by William Charlton will advise the company on financial aspects. Bill has been a Managing Partner of UHY Haines Norton for 8 years.

Bills Expertise is:

- Strategic planning to small to medium sized businesses, including risk assessment, asset protection, succession planning and estate planning, employee incentive programs, investor ready program, purchase and sale of businesses, extracting shareholder value from businesses.
- Active advisory board member for small to medium sized businesses.
- Preparation of expert reports to support various litigation matters, including: business interruption, company / project solvency and sustainability, loss of profits, economic loss assessments, and shareholder disputes, tracing of funds and cash and income tax implications of loss claims

COMPLIANCE

Next Practice Education have been engaged to provide compliance services and oversight. Which will empowers Starcorp Energy to best achieve significant and sustainable improvement in their performance, customer satisfaction, and profitability. Their focus is to work closely with Starcorp Energy to maximise opportunities and manage risk.

Bringing a wealth of experience having been involved with over 1172 International Standard improvement projects, involving multinational commercial companies, our team have been privileged to gain outstanding insights as to the key ingredients that, when combined, empower business growth.

3.7 BUSINESS PLAN

A comprehensive Business Plan is attached that addresses the requirements of the authorisation. Starcorp Energy's business model is to on-sell energy to small customers within embedded networks as an authorised retailer.

See **Attachment A – Starcorp Energy Business Plan**.

3.8 QUALITY ASSURANCE ACCREDITATIONS

Starcorp Energy is a newly incorporated company and does not currently have any formal quality assurance accreditations. Starcorp Energy intends to apply policies, procedures and resources to achieve the highest levels of quality assurance.

Starcorp Energy has engaged Next Practice Education to assist in developing internal systems.

3. Organisational and Technical Capacity

3.9 COMPLIANCE STRATEGY

Starcorp Energy has implemented a compliance policy consistent with Australian Standard AS3806-2006 representing core principles of commitment, implementation, monitoring and measuring and continuous improvement.

Starcorp Energy's compliance strategy will also ensure compliance with and adherence to the following (including but not limited to):

- National Energy Retail Law (including any jurisdictional amendments)
- National Energy Retail Regulation
- National Energy Retail Rules
- National Electricity Law
- National Electricity Rules
- AER Retail Pricing Information Guideline

Our compliance strategy has been approved by management. It has also been independently reviewed by Best Practice Certification to ensure all factors that may influence performance have been accounted for.

See **Attachment C – Compliance Strategy 2017**.

3.10 APPROACH TO MANAGING COMPLIANCE AND RISK

COMPLIANCE POLICY AND PROCEDURE

Starcorp Energy remains committed at all times to complying with all contractual, legal and other requirements. This will be achieved through implementation of the Compliance Policies and Procedures in accordance with the Australian Standard for Compliance Systems AS ISO 19600.

Starcorp Energy has been provided external certification from Best Practice Certification confirming in writing that Starcorp Energy's Compliance Policy complies with AS ISO 19600.

See **Attachment C – Compliance Strategy 2017**.

CUSTOMER HARDSHIP POLICY

Starcorp Energy's Customer Hardship Policy, is to identify customers experiencing payment difficulties due to hardship and assist those customers to better manage their energy bills on an ongoing basis. Starcorp Energy's Customer Hardship Policy has been reviewed against the requirements of the National Energy Retail Law and the Guidance on AER approval of customer hardship policies and Starcorp Energy is satisfied that it complies.

See **Attachment D – Hardship Policy**.

3. Organisational and Technical Capacity

RISK MANAGEMENT STRATEGY

Starcorp Energy has implemented a risk management framework consistent with ISO 31000:2009. The key risks associated with operating an electricity retail business such as, responsibilities, authorities and processes associated with risk management, including the management of strategic, operational, financial, work health and safety risks and the identification of environmental aspects and impacts have been identified in our policy.

Starcorp Energy has a detailed Energy Risk Management Policy in place that has been approved by management and independently reviewed to ensure all factors have been accounted.

Starcorp Energy has been provided external certification from Best Practice Certification confirming in writing that Starcorp Energy's Risk Management Policy complies with ISO 31000:2009.

See **Attachment E – Risk Management Policy.**

COMPLAINT AND DISPUTE RESOLUTION PROCEDURE

Starcorp Energy has an established Complaint and Dispute Resolution Procedure that has been developed in accordance with AS ISO 10002:2006.

Starcorp Energy has been provided external certification from Best Practice Certification confirming in writing that Starcorp Energy's Complaint and Dispute Resolution Policy complies with AS ISO 10002:2006.

See **Attachment F - Dispute Resolution Policy.**

ADDITIONAL INFORMATION SUPPORTING STARCORP ENERGY'S ABILITY TO MANAGE RISK

Starcorp has developed an Energy Supply Agreement to support its embedded network operations business. This agreement has been reviewed by management to assess its conformance with the National Energy Retail Law and Rules.

See **Attachment G – Energy Supply Agreement.**

EXTERNAL AUDIT

Best Practice Certification has performed an external audit of Starcorp Energy's compliance, risk management, Customer Hardship and Dispute Resolution systems and processes.

Best Practice Certification is one of just 37 Conformity Assessment Bodies (CAB) trading within the formally recognised framework of the Joint Accreditation System of Australia and New Zealand (JASANZ) for many of its programs.

Best Practice Certification programs have been designed to assist organisations to maintain a high level of compliance in line with global industry best practice. Best Practises programs are targeted at helping organisations identify areas of improvement that will provide bottom line benefits for your business. Best Practise offer certification assessments for ISO 9001, ISO 14001, AS/NZS 4801, OHSAS 18001 and ISO 27001 among many other available standards.

See **Attachment H - External Audited Accreditation Certificate.**

3. Organisational and Technical Capacity

3.11 HUMAN RESOURCES POLICY REGARDING EMPLOYEE QUALIFICATIONS

Starcorp Energy has recruitment and selection process for new employees. Outlining a predetermined set of qualifications agreed by the direct Manager and the HR Manager/Consultant. It is the responsibility of the direct manager with support from the HR Manager to ensure that the chosen candidate has the required qualifications, experience and education required to carry out duties of the specific role.

The Starcorp Energy recruitment policy will focus to increase efficiency in hiring and retention and to ensure consistency and compliance in the recruitment and selection process.

Our policy and process of recruitment include the following steps;

- Identify vacancy and identify need;
- Develop position description;
- Develop recruitment plan;
- Select search committee/people
- Post position and implement recruitment plan
- Review applicants and develop short list
- Conduct interviews
- Select hire
- Finalize recruitment and issue employment contracts.

See **Attachment I - Human Resource Recruitment Policy.**

3.12 TRAINING PROGRAMS AND TRAINING POLICIES

Starcorp Energy has developed a comprehensive training program. The training program covers mandatory training for all staff and specific training for staff involved in electricity retailing and support functions. Compulsory training for all staff includes company induction, compliance and risk, complaints handling, privacy and business conduct. Specific training for staff involved in customer interaction and support function for the electricity retailing business include compliance and operational topics.

Completion of the required training program will be regularly reviewed as part of the compliance plan and the individual's performance review. Training will be delivered in-house and through third party training providers. Training will be recorded in the Training Register and records will be maintained for a minimum of seven years.

Starcorp Energy will be working with a National training service provider, to identify and facilitate training both through internal and external training courses, and assist in adapting training policies as Starcorp Energy becomes more operational.

See **Attachment J - Training Policy.**

3. Organisational and Technical Capacity

3.13 INSURANCE ARRANGEMENTS

Starcorp Energy has all appropriate business insurances in place with Berkley Insurance Australia, including public liability, product insurance and professional indemnity insurance.

See **Attachment K – Starcorp Energys' Insurance Arrangements.**

3.14 OUTSOURCING & THIRD PARTY ARRANGEMENTS

All operational aspects of the retail business will be carried out by Starcorp Energy. All outsourced services that will assist Starcorp Energy staff with the operation of the retail license can be seen in are explained above in this application.

Starcorp Energy will purchase energy from existing authorised retailer and not directly from AMEO. Holding the retail contract on behalf of the strata community will not change this function, this contract will be held on the gate/parent NMI.

3.15 OMBUDSMAN SCHEME MEMBERSHIP

Starcorp Energy has applied to the Energy and Water Ombudsman of Queensland (EWOQ) to join their industry ombudsman scheme. Registrations for schemes in other jurisdictions will be made as and when the business enters markets in these jurisdictions. Starcorp Energy will update the AER of any changes to its energy industry ombudsman scheme participation.

See **Attachment L - Application to EWOQ.**

3.16 AGREEMENTS WITH KEY MARKET PARTICIPANTS

Starcorp Energy's business model does not require it to register as a Market Participant or enter commercial agreements with network service providers or wholesale counterparts. As a retailer supplying electricity to customers within embedded networks, Starcorp Energy will purchase energy for each property's gate meter from an existing authorised retailer, under a negotiated market retail contract. The terms and conditions of these contracts will be consistent with retailer electricity supply agreements.

3.17 PREVIOUS ROLR EVENTS

As a new participant in the National Electricity Market, Starcorp Energy has not been involved in any situations that have triggered a RoLR event.

4. Financial Resources

4.1 FORECAST AND GOING CONCERN

Starcorp Energy is an Australian company, established as a start-up energy retailer.

As Starcorp Energy will initially not be a Market Participant, the business will only require modest financial prudential arrangements. Starcorp Energy has access to sufficient working capital to operate its new energy business for the foreseeable future.

Starcorp Energy's Business Plan and Financial Model and Forecast detail funding arrangements that are appropriate for carrying on a retail energy business.

See **Attachment M – Financial Model and Forecast.**

4.2 RETAINED ACCOUNTING FIRM STATEMENT

Retained Accounting Firm Declaration is contained together with the Financial Model.

See **Attachment M – Financial Model and Forecast.**

4.3 ACCESS TO SUFFICIENT WORKING CAPITAL

As Starcorp Energy will initially not be a Market Participant, the business will only require modest financial prudential arrangements. Starcorp Energy has access to sufficient working capital to operate its new energy business for the foreseeable future.

See **Attachment N - Working Capital Statements.**

4.4 FORECAST REVENUE AND EXPENSES

For a forecast of Starcorp Energy's expected revenue and expenses please see the Financial Model.

See **Attachment M – Financial Model and Forecast.**

4.5 INDEPENDENT AUDITOR APPOINTED

Starcorp Energy has appointed UHY Haines Norton as its independent auditors.

See **Attachment O - Independent Auditors' Written Declaration.**

4.6 COPIES OF INFORMATION REQUIRED BY ASIC

No reporting to ASIC has been made at this stage.

4.7 CREDIT RATINGS

Starcorp Energy is a start up business and does not currently have a credit rating.

4. Financial Resources

4.8 OWNERSHIP STRUCTURE

The ownership structure and equity arrangements are contained within the Business Plan and the Financial Model.

4.9 WRITTEN DECLARATION FROM ACCOUNTANTS

A written declaration from Starcorp Energy's accountant is enclosed, which confirms:

- An insolvency official has not been appointed in respect of the business or any property of the business.
- No application or order has been made, resolution passed or steps taken to pass a resolution for the winding up or dissolution of the business.
- They are unaware of any other factor that would impede your ability to finance your energy retail activities under the authorisation.

See **Attachment P - Accountants Written Declaration.**

4.10 DIRECTORS FINANCIAL DECLARATION

The directors of Starcorp Energy have provided a declaration confirming that:

- The company is a going concern; and
- They are not aware of any factor that would impede the ability of the company to finance its energy retailer activities under the retailer authorisation for the next 12 months.

See **Attachment Q - Directors' Financial Declaration.**

4.11 NAMES AND ADDRESSES OF KEY OFFICERS

Names and current residential addresses of directors is enclosed.

See **Attachment R - Director's Details.**

5. Suitability

Starcorp Energy recognises the critical importance of its energy retail business being run by suitable officers. To support its application, Starcorp Energy has provided:

A) Starcorp Energy Code of Business Conduct and Ethics

See **Attachment S - Code of Conduct and Ethics**.

5.1 SUITABILITY OF COMPANY DIRECTORS AND OFFICERS

Starcorp Energy's CEO, Perry Stahmer has provided a declaration confirming that he is not aware of its directors, management team or officers being involved in any of the following:

- A)** Have never been disqualified from the management of corporations;
- B)** Has never been involved with previously revoked authorisations or licences held in any industry.
- C)** Have not been involved with any past or present bankruptcy or insolvency proceedings in Australia or overseas.
- D)** There has been no material failure to comply with regulatory requirements, laws or other obligations over the past 10 years.

See **Attachment T - Chief Executive Officer Suitability Declaration**.

5.2 REGULATORY COMPLIANCE

Starcorp Energy and, to the best of its knowledge, its officers, associates, and other businesses where its officers have held an officer position, has not:

- Been 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 (including voluntary administrative undertakings) being taken by a regulatory body;
- Had any authorisations, authorities or licences (held in any industry) revoked;
- Failed in its application for any authorisation, authority or licence in any industry;
- Been the subject of any past or present administrative or legal actions in relation to an authorisation, authority or licence in any industry; and
- Been involved in any situation/s where they (or an associate) have previously triggered the RoLR provisions of the Retail Law or equivalent state/territory/foreign legislation, or have transferred or surrendered an authorisation or licence in circumstances where if not done, triggering a RoLR event would have been likely.

5. Suitability

5.3 OTHER OFFENCES

Starcorp Energy confirms that it has not been involved with any prosecutions under any territory, state, commonwealth or foreign legislation, (including, but not limited to, the Australian Securities and Investment Commission Act 2001 (Cth), Competition and Consumer Act 2010 (Cth) and the Corporations Act 2001 (Cth)) that are relevant to Starcorp Energy's capacity as a holder of a Retailer Authorisation.

We also confirm that no offences have been committed against, or been prosecuted under, any such legislation, including Directors or persons who have significant involvement in Starcorp Energy.

5.4 POLICE CHECK

Upon request, Starcorp Energy is happy to commit to a criminal history check on any director or persons who have significant involvement in Starcorp Energy.

5.5 CODE OF BUSINESS CONDUCT AND ETHICS

In regards to the AER requirement for policies and procedures in relation to probity and competence of officers and key management staff, Starcorp Energy has developed and adheres to both a Code of Business Conduct and Ethics and Customer Charter, which applies to all staff. Before any director, officer or staff member commences with the Company, they are required to formally acknowledge that they have received, read and understood the Code and will comply with it.

See Attachment S – Code of Conduct and Ethics

See Attachment U – Customer Charter

6. Appendices

ATTACHMENT A - BUSINESS PLAN

ATTACHMENT B - ORGANISATIONAL CHART

ATTACHMENT C - COMPLIANCE STRATEGY 2017

ATTACHMENT D - HARDSHIP POLICY

ATTACHMENT E - RISK MANAGEMENT POLICY

ATTACHMENT F - DISPUTE RESOLUTION POLICY

ATTACHMENT G - ENERGY SUPPLY AGREEMENT

ATTACHMENT H - EXTERNAL AUDITED ACCREDITATION CERTIFICATE

ATTACHMENT I - HUMAN RESOURCE RECRUITMENT POLICY

ATTACHMENT J - TRAINING POLICY

ATTACHMENT K - STARCORP ENERGYS INSURANCE ARRANGEMENTS

ATTACHMENT L - APPLICATION TO EWOQ

ATTACHMENT M - FINANCIAL MODEL & FORECAST

ATTACHMENT N - WORKING CAPITAL STATEMENTS

ATTACHMENT O - INDEPENDENT AUDITORS' WRITTEN DECLARATION

ATTACHMENT P - ACCOUNTANT'S WRITTEN DECLARATION

ATTACHMENT Q - DIRECTORS' FINANCIAL DECLARATION

ATTACHMENT R - DIRECTORS' DETAILS

ATTACHMENT S - CODE OF CONDUCT AND ETHICS

ATTACHMENT T - CHIEF EXECUTIVE OFFICER SUITABILITY DECLARATION

ATTACHMENT U - CUSTOMER CHARTER