



Discover Energy

Application for Gas Retail Licence

Discover Energy Pty Ltd
Suite 2, Level 23, 111 Pacific Highway
North Sydney, NSW 2060

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1. Introduction

This is a **gas retail licence application** by Discover Energy Pty Ltd (ABN 20 619 204 750) (**Discover Energy**) lodged with the Essential Services Commission (**the Commission**) for the sale of electricity in Victoria.

On 23 January 2018, and 13 December 2019 respectively, the Australian Energy Regulator (**the AER**) approved an electricity retailer and a gas retailer authorisation application from Discover Energy under the National Energy Retail Law.

Discover Energy is an Australian proprietary company, limited by shares. Please see **Annexure A** which contains Discover Energy's certificate of business registration.

This application consists of the following:

- Information and nature of the application;
- Financial viability;
- Technical capacity and
- Fit and proper person.

A number of relevant attachments are provided and referenced throughout this application document.

Documents or attachments that are clearly marked as 'commercial-in-confidence' do not form part of the public component of this application.

2. Information and Nature of the Application

Legal name:	The applicant is Discover Energy Pty Ltd.
Trading name:	As above.
ABN/ACN:	ABN 20 619 204 750 or ACN 619 204 750
Registration date:	19/05/2017
Business address:	Suite 2, Level 23, 111 Pacific Highway, North Sydney 2060
Postal address:	As above.

Contact person: Anson Zhang
Chief Executive Officer
Suite 2, Level 23, 111 Pacific Highway
North Sydney NSW 2060
Email: [REDACTED]
Telephone: [REDACTED]

Type of licence sought: **Gas (and Electricity – see separate application)**

Commencement date: **4th Quarter 2020**

Type of customers: Discover Energy will target predominantly small customers (with gas consumption of up to 1TJ per annum) initially, with a small number of large customers (with gas consumption above 1TJ per annum) to be added in time. It will retail electricity and gas to Victorian small customers at the early stages of launch and growth before considering expanding into large customer segments.

2.1 Nature and scope of operations

Discover Energy is an all in one energy provider, with a mission to advance 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 (to non-solar households), and competitive price plans with attractive feed-in tariffs (to solar-households) and bundling in natural gas in its portfolio of retail offers.

Discover Energy aims to be a long-term sustainable dual fuel energy retailer with the aim 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.

2.2 Licences held by Discover Energy and associates

On 23 January 2018, and 13 December 2019 respectively, the Australian Energy Regulator (**the AER**) approved an electricity retailer and a gas retailer authorisation application from Discover Energy under the National Energy Retail Law.

2.3 Previous unsuccessful licence applications

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

2.4 Details of non-standard licence conditions

Discover Energy will not be pursuing any non-standard licence conditions as part of this application.

2.5 Activities within the energy industry

Discover Energy is a recent entrant and participant in the energy retail sector. On 1 July 2019, market operations started, and electricity offers were advertised through the Energy Made Easy platform. We have since acquired a small number of customers who are open to technological innovations and solutions, and it remains our mission to build the business model capitalising on new technologies that will benefit the customers.

The electricity offers have so far targeted specific segments of the market – customers who require multilingual customer service support, and residential and small business customers with and without solar systems. The engagement of customers with solar already installed on their roofs has allowed Discover Energy to develop and reach a stable number of customers to manage load capacity and to mitigate wholesale trading risks.

In the AER jurisdictions, Discover Energy is currently offering competitive electricity price plans and electricity price plans with attractive feed-in tariffs (for solar households) and we are seeking to further (a) offer competitive electricity with gas bundled plans in July 2020, and (b) extend the electricity and gas offers to consumers in Victoria by the fourth quarter of 2020.

In order to remain competitive in the industry, Discover Energy will take an integrated and co-ordinated approach to incorporate solar and storage into its energy retail activities, and will leverage its long-term partnerships with solar and storage system providers and installers for

channel access to introduce Discover Energy's energy offers including electricity (and gas) retail plans across Australia.

Discover Energy has 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.

2.6 Activities external to the energy industry

With the same Directors as One Stop Warehouse (**OSW**) on the Executive Team of Discover Energy, Discover Energy has been able to draw on the extensive experience and skills of OSW in the solar photovoltaic and storage business, and share its resources and network of contacts, creating synergies beneficial to both businesses. The ownership structure of Discover Energy is detailed in **Annexure B**, provided on a commercial-in-confidence basis.

OSW was first established in Western Australia in January 2013, selling photovoltaic products. In a span of 7 years, it has grown to be 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 2019, it was ranked by the Australian Financial Review as the top 500 private companies in Australia.

Besides an extensive network of OSW's solar retailers and installers with which Discover Energy shall 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.

In addition, Discover Energy has a number of industry-experienced and reputable third-party partners and outsourced service and system providers, the details are provided in section 2.9 below.

2.7 Organisational structure

Discover Energy's organisational structure (including key areas of energy retail and its capability), and its officers' contact details are detailed in **Annexure C**, 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	
	Chief Operations / Technology Officer	
Strategy & Sales	Strategy Development Manager	
	National Sales Manager	
	Business Development Managers	
	Marketing Executive	
		Channel Sales Partners
Operations	General Manager, Operations	
	Business Manager, Product & Compliance	
Finance	Finance Manager	
	Finance Executive	
	Junior Market Trader	
	Responsible Manager (AFS Licence)	External Support Partner
		Commonwealth Bank
Technical	Project Director	
	IT Support	
		System Partners
Business Function	Roles (Internal)	External Support Partners
Human Resources	Human Resources Manager	

2.8 Experience of key personnel (summary)

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 7 years.

In both 2018 and 2019, Anson was also nominated a Finalist (Energy category) in the prestigious Executive of the Year Awards 2018, 2019.

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.

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.

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

Beth has over 9 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.

Ms. Jade Li (Finance Manager)

Qualified CPA

Masters, Business Administration (IT), Charles Sturt University

Bachelor of Business (Accounting), Charles Sturt University

Jade has close to 16 years of accounting and finance experience with much of her experience and skills gained in the high-end hotels, and investment industries.

In her 16 years in the finance industry, Jade has managed the whole range of finance functions covering general cashier duties, income auditing, cost control, accounts receivables and payables, payroll and tax payments, bank reconciliations, budgeting and risk managements, year-end financial reports, asset control and management, and developing strategic feasibility models.

Before joining Discover Energy, Jade was managing and consolidating financial and management reports for up to 13 companies in the group.

Jade is also a fully qualified Certified Public Accountant.

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.

Mr. Ian Gittus (Strategic Development Manager)

Bachelor of Arts (Political Science)

Ian 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.

2.9 Third-party service and system providers

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.

Annexure D provided on a commercial-in-confidence basis details the engagement of individuals and suppliers with the relevant experience involved in Discover Energy.

2.10 Prosecutions and/or regulatory complaints

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 E**, provided on a commercial-in-confidence basis is a signed declaration from the CEO.

2.11 The Commission's objectives

In providing Discover Energy's energy products and services to its customers, Discover Energy will seek to uphold the Commission's objectives as set out under Section 18 of the *Gas Industry Act 2001 (VIC)* and Section 8 of the *Essential Services Commission Act 2001 (VIC)*.

2.11.1 Long-term interests of Victorian consumers

Discover Energy will contribute to the Victorian energy market by providing greater competition, better consumer choice and fairness, and improved services. In NSW, QLD and SA, Discover Energy has provided attractive and competitive energy plans. Various customer service platforms (in a few languages) are made available to help its customers understand their energy plans and improve the overall customer experience. In the AER jurisdictions, Discover Energy has also adopted the Sustainable Payment Plans Framework, and aims to uphold similar support to customers in Victoria.

2.11.2 Promoting retail competition within the industry

Discover Energy will actively provide to its customers greater savings in their energy plans. Focusing on technology-advancement in the energy-retail and energy industry as a whole, Discover Energy will bring more competition by creating customer-suited energy plans and service differentiation to the Victorian customers.

2.11.3 Essential services – price, quality, and reliability

The Company has been founded on 5 core values – be customer-driven (to provide reliable, accountable and quality customer-service), be open and innovative (to be receptive to all concepts to innovate and compete effectively in the market), be agile (to respond quickly to changes in the industry), and to be passionate (in the work we do). Our values will be our guiding light to achieve this objective.

2.11.4 Industry efficiency and long-term investment

The Discover Energy business model is built on technological innovations to bring efficiency (to the customers) and will be the key to sustainability in the industry - driving investments to the company and industry in the long term.

2.11.5 Promoting a consistent regulatory approach within the industry

Our key personnel have extensive experience in dealing with compliance and regulatory matters in Victoria and within the Australian energy industry. The objective of a consistent

regulatory approach will be achieved by the application of the same regulatory standards (Discover Energy has significant experience operating in NECF) and Discover Energy will ensure controls are in place for all Victorian specific regulatory obligations.

2.11.6 Promoting consistency in regulation between states

Discover Energy will be operating in multiple jurisdictions. The Company will offer a consistent approach, proposition and procedures to enable consistency across all states, tailoring its approach to account for the respective local regulatory requirements of each state.

3. Financial Viability

3.1 Business plan

Discover Energy has access to significant financial resources via 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 plan, and its pro-forma financial statements and business assumptions for the next 5 years are provided on commercial-in-confidence bases in both **Annexure F**, and **Annexure F1**.

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 and compliance risks.

3.2 Declaration from CFO, CEO or Director

A written declaration from Discover Energy's CEO is provided on a commercial-in-confidence basis in **Annexure G**, confirming the company's current financial position, and confirming that no Discover Energy and OSW businesses, subsidiaries or related entities have been involved in any past or present bankruptcy proceedings in Australia or in any overseas jurisdiction.

3.3 Declaration from independent auditor, financial statements

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

A current bank statement, and a Financial Statement for the financial year 2018/2019 are provided on a commercial-in-confidence basis in **Annexure I** and **Annexure J** respectively.

3.4 Bank guarantees or arrangements for additional capital

Letters of support from external parties in favour of Discover Energy are attached and marked **Annexure K** and **Annexure L** and provided on a commercial-in-confidence basis.

3.5 Industry and market participation agreements

3.5.1 AEMO Registration

Discover Energy is an authorised electricity and gas retailer in the AER jurisdictions and is registered with AEMO as a market participant. It has customers in other state jurisdictions and engages directly with AEMO on market interfaces and transactions, settlement activities and prudential requirements.

3.5.2 ASX Austraclear Participation

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

3.5.3 Gas Purchasing

Discover Energy will access wholesale gas supply initially from the Declared Wholesale Gas Market (DWGM) and will enter into supply and financial trading arrangements with wholesale counterparties through the various financial markets in time.

3.5.4 Distribution Network Providers

Discover Energy has initiated dialogues with AusNet Services, and Australian Gas Networks in Victoria.

3.5.5 Gas Safety Case

Discover Energy intends to progress a gas safety case with Energy Safe Victoria upon the submission of the gas retail licence application. It is currently in discussion with an external service provider to progress on its AFSL application.

3.5.6 Credit Rating

Discover Energy has provided a credit rating in the form of an Equifax Score. This is for the purpose of, and to be used in connection with the Victorian electricity and gas distributors' use of system agreements.

4. Technical Capacity

The information detailed below and the annexures attached demonstrate Discover Energy's technical capacity.

Discover Energy's technical capacity will be achieved through internal resource development, strategic recruitment over time and engagement of experienced and reputable outsourced system and service providers.

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 compliance documentation, provided in the annexures, demonstrates a commitment to and understanding of, the compliance requirements and obligations of a retailer.

The Discover Energy team, with the support of OSW and guidance from external service providers, and its recruitment of key staff over time, has developed a strong awareness and understanding of key industry success factors including the various energy market risks associated with wholesale supply and trading, operational compliance and financial management.

Discover Energy's operations will be conducted and managed strictly in compliance with applicable laws in the state of Victoria at all times.

4.1 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's Compliance Policy provided on a commercial-in-confidence basis in **Annexure M** 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 including those under the Retail Law, and Retail Rules, The Energy Retail Code and other applicable codes and guidelines.

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:

- The Compliance Committee: Responsible for developing and implementing the compliance program via the development of policies, procedures and training programs.
- Compliance Lead/Manager and all personnel: Responsible for the day to day oversight of the compliance program of Discover Energy.
- External Advice: Discover Energy, as part of its compliance program, obtains advice on compliance and legal issues from a number of qualified external providers on an "as-required" basis.
- Information System and Technology: 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.
- Documentation: 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.
- Compliance Risk Assessments: 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.

- Training and Assessment: 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.
- Compliance and Risk Committee: has formed a Compliance and Risk Committee which is focused on regulatory compliance, business risk and the management of its wholesale market risk. This committee will meet regularly to review current compliance and wholesale risks. This risk committee is made up of members of the board of directors and senior management staff.

Please find attached Discover Energy's compliance related policies and procedures provided on a commercial-in-confidence basis:

- **Annexure N**: Discover Energy Compliance Plan and Obligations;
- **Annexure N1**: Discover Energy Records Management Policy;
- **Annexure N2**: Discover Energy Code of Conduct;
- **Annexure N3**: Discover Energy Hardship Policy (Victoria);
- **Annexure N4**: Discover Energy Standard Complaints and Dispute Resolution Policy;
- **Annexure N5**: Discover Energy Summary of Rights and Obligations;
- **Annexure N6**: Discover Energy Life Support Policy;
- **Annexure N61**: Discover Energy Family Violence Policy;
- **Annexure N7**: Discover Energy Recruitment and Selection Policy;
- **Annexure N8**: Training Register;
- **Annexure N9**: Discover Energy Privacy Policy;
- **Annexure O**: Discover Energy Risk Management Policy; and
- **Annexure O1**: Discover Energy Risk Register;
- **Annexure P**: Discover Energy Work, Health & Safety Policy
- **Annexure Q**: Market Retail Terms and Conditions
- **Annexure Q1**: Standard Retail Terms and Conditions
- **Annexure Q2**: Product Disclosure Statement
- **Annexure R**: Discover Energy Customer Charter

Under Discover Energy's Complaints and Dispute Resolution 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.

4.2 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 O** 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.

4.3 Details of external audit of compliance and risk strategy

Discover Energy's Compliance Policy and Risk Management Policy have undergone external audit and 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 S**.

4.4 Additional risk management information

4.4.1 Retail Contracts

Discover Energy's Retail Contract with its Terms and Conditions is provided in **Annexure Q**.

4.4.2 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

4.4.3 Distributor and Meter Service Providers

Discover Energy has initiated dialogue with Citipower/Powercor, United Energy, AusNet Services and the Australian Gas Network in Victoria and will also engage relevant metering companies for metering services.

4.5 Ombudsman scheme memberships

Discover Energy has made enquiries to become a scheme member of Energy and Water Ombudsman of Victoria (EWOV) and to understand the conditions and obligations of the scheme.

It is already a participating scheme member of Energy and Water Ombudsman of New South Wales, Energy and Water Ombudsman Queensland, and Ombudsman South Australia.

5. Fit and Proper Person

Discover Energy is a fit and proper entity to hold a retail licence. 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 ESC requests for probity checks to be undertaken on its key officers.

5.1 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.

5.2 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.

5.3 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.

5.4 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.

5.5 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.

5.6 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.

5.7 Statutory Declaration from CEO

Attached marked **Annexure T** is a statutory declaration from Discover Energy's CEO confirming that the information contained in the application stands true and correct.

5.8 Policies and Procedures on Officers' Probity and Competence

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

- **Annexure N2**: Discover Energy Code of Business Conduct; and
- **Annexure C**: Officers' Full Names and Addresses

List of Annexures:

<u>Document</u>	<u>Description</u>	<u>Confidential</u>
Annexure A	Certificate of Registration	No
Annexure B	Ownership Structure	Yes
Annexure C	Organisation Chart & Officers Contacts	Yes
Annexure D	List of Providers and Suppliers – Support Services	Yes
Annexure E	Declaration from CEO	Yes
Annexure F	Business Plan	Yes
Annexure F1	Financial Forecast	Yes
Annexure G	CEO Declaration of Financial Position	Yes
Annexure H	Auditor Declaration of Financial Position	Yes
Annexure I	Discover Energy Bank Statement	Yes
Annexure J	Discover Energy Financial Statement	Yes
Annexure K	Bank Loan Offer from Commonwealth Bank of Australia	Yes
Annexure L	Discover Energy Bank Guarantee	Yes
Annexure M	Compliance Policy	Yes
Annexure N	Compliance Plan and Obligations Victoria	Yes
Annexure N1	Records Management Policy	Yes
Annexure N2	Code of Business Conduct	Yes
Annexure N3	Hardship Policy Victoria	Yes
Annexure N4	Standard Complaints and Dispute Resolution Policy	No
Annexure N6	Life Support Policy	Yes

<u>Document</u>	<u>Description</u>	<u>Confidential</u>
Annexure N61	Family Violence Policy	No
Annexure N7	Recruitment and Selection Policy	Yes
Annexure N8	Training Register	Yes
Annexure N9	Privacy Policy	No
Annexure O	Risk Management Policy	Yes
Annexure O1	Risk Register	Yes
Annexure P	Work Health Safety Policy	Yes
Annexure Q	Market Retail Terms and Conditions	No
Annexure Q1	Standard Retail Terms and Conditions	No
Annexure Q2	Product Disclosure Statement	No
Annexure R	Customer Charter	No
Annexure S	External Audit Verification of Compliance & Risk	Yes
Annexure T	CEO's Statutory Declaration	Yes