

Retail Obligations Regarding Financial Hardship

Diamond Energy has systems in place to enable it to meet its customer hardship obligations under the National Energy Retail Law, National Energy Retail Rules, the AER's Customer Hardship Policy Guideline, and our customer hardship policy.

Our Social Responsibilities and Customer Values

As an electricity retailer, we consider that we have a responsibility to give special consideration to the interests of residential customers who are experiencing financial pressure and are having difficulty in paying their energy bills.

At Diamond Energy, we treat all customers respectfully and take a compassionate and sensitive approach to discussing a customer's financial hardship matters. We are committed to both prevention and intervention as a means of mitigating energy related financial hardship.

We recognise that any customer may experience times of genuine financial hardship. Customers can experience genuine financial hardship when they intend to pay, but are unable to, because of circumstances beyond their control.

We believe that a customer in these circumstances should not be subject to the additional burden and stress of being threatened with disconnection and collection action.

Definition of Customers in Financial Hardship

Diamond Energy defines customers in financial hardship as customers who have the intention to pay their energy bills but not the capacity.

Financial hardship can be classified as either short term or long term. Short term financial hardship is if a customer is in difficulty because of a temporary change in circumstances. Some examples of short term financial hardship are:

- If a customer has received a number of bills at the same time
- If a customer has incurred an unexpected or emergency one-off expense
- If a customer has had their income drastically reduced i.e. if the customer works casually and has been forced to reduce their hours

In these circumstances we offer a level of flexibility in payment terms to assist the customer in formulating a payment plan.

Long term financial hardship is classified as when the customer has difficulty meeting the cost of energy use on an ongoing basis. In these circumstances Diamond Energy will:

- Provide flexible payment arrangements
- Provide information on and recommend that the customer applies for help under a Government Assistance program. Government Assistance Programs include the Home Energy Emergency Assistance Scheme (Queensland), Utility Relief grant Scheme (Victoria), Emergency Energy Payment Scheme (South Australia), Emergency Accounts Payment Assistance Scheme (New South Wales)
- Provide services to assist customers understand and where possible, reduce their electricity consumption

Residential Customer Hardship Policy & Charter

Introduction

Diamond Energy Hardship Policy (“Hardship Policy”) outlines the commitments that we give for assisting residential customers who are experiencing genuine financial hardship. This policy is based upon principles of fairness, understanding, compassion, dignity and privacy.

This policy applies to all residential customers living in New South Wales, Queensland and South Australia who find it hard to pay their energy bills due to hardship. You might experience hardship because of factors like:

- Death in the family
- Household illness
- Family violence
- Unemployment
- Reduced income

This policy explains:

- What we will do to help you manage your energy bills
- How we consider your circumstances and needs
- Your rights as a customer in our hardship program

You can ask a support person to contact us, such as:

- A financial counsellor
- Someone who helps you manage your energy bills

We need your permission to talk to your support person.

Identification of Customers with Financial Hardship

Customers on financial hardship are the most extreme cases of customers who are having difficulty making payment on their electricity account.

Generally the most useful methods to find a customer is on hardship is;

- Extreme changes in circumstances including unemployment and sickness
- Customer had extreme changes in housing, including divorce or separation
- Customer has failed to meet a previous payment arrangement for debt and is unable to reach an agreement on a new payment arrangement due to financial difficulty.

Customer Self-Identification

Diamond Energy prompts their customers through gentle reminders notices such as email, SMS and follow up phone calls to make contact if facing difficulty to meet their financial commitments. Diamond Energy is very reasonable and flexible in providing the best support to assist with payments.

Diamond Energy’s Proactive Approach

During an interaction with a customer, staff are trained to ask targeted questions to get a sense for the customer’s current financial situation. Before referring a customer to the Hardship Team we may ask:

- What has been the cause of the financial difficulty?
- What is their current financial situation (are they working, unemployed etc)
- Has the customer tried a previous payment arrangement?

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- Is the customer currently a concession or receiving a government benefit?
- Does the customer expect this will be a short term situation or ongoing?

What happens to the customer next?

Once the customer has been transferred to one of the Hardship Management Team they will be assessed for entry to the Hardship Program and if successful will be put onto an appropriate payment arrangement and given contact details for people within the company to contact directly about the arrangement.

What we will do to help you

We will tell you about our hardship program if:

- You tell us you are having trouble paying your bill
- You are referred to our program by a financial counsellor or other community worker
- We are concerned that you may be experiencing financial hardship

We will recommend you speak to a staff member to help you join our hardship program if you have:

- A history of late payments
- Broken payment plans
- Requested payment extensions
- Received a disconnection warning notice
- Been disconnected for non-payment

We can also support you to join our hardship program if you tell us:

- You are eligible for a relief grant or other emergency assistance
- You have personal circumstances where hardship support may help. For example, death in the family or job loss

You may have trouble paying your bills for different reasons. Please contact us so we can discuss your individual situation.

Our staff are specially trained to help you with hardship. Staff will:

- Ask you a few questions about your circumstances
- Work out if you can join the hardship program

We will assess your application for hardship assistance by *5 business days from when we receive your application*.

We will let you know if you are accepted into our hardship program within *5 business days* from receipt of the application.

If you are accepted into our hardship program, we will:

- Tell you if you are on the right energy plan or tariff and let you know if there is a better plan or tariff for you
- Tell you about government concessions, relief schemes or energy rebates you may be able to receive
- Give you ideas about how to reduce your energy use
- Talk to you about a payment amount that suits your circumstances

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If you are not accepted into our hardship program, we will provide you with an explanation for your ineligibility. We will send you a free copy of our Hardship Policy.

Diamond Energy will send a copy of the Hardship Policy in accordance with the customer's preferred method of receiving written communication.

Payment Options

Diamond Energy offers flexible bill payment options and payment plans. This can be arranged on a case by case basis through discussions with our customer service team or our specialist financial hardship staff.

What we will do:

There are different payment options available to hardship customers, including:

- Payment plans
- Centrepay
- Direct Debit
- BPAY
- Electronic Funds Transfer (EFT)
- Pay in person at Australia Post

When you are in our hardship program, we will offer you flexible payment options to suit your individual situation. To make your payment plan, we will consider:

- How much you can pay
- How much you owe
- How much energy we expect you will use in the next 12 months

This will help us figure out a payment plan that is right for you.

We will offer a payment plan to suit your situation. This will include payments to cover:

- What you owe
- An amount to cover your energy use

We will work with you.

Our customer payment plans take into account personal circumstances and a household's ability to meet their basic living expenses within their current level of income. We consider factors such as income, current financial commitments and basic living expenses, long and short term personal circumstances such as illness, disability and unemployment.

An example payment plan may include averaging your bill over the past 12 months, taking into account any outstanding debt and adding an allowance for consumption growth.

Once we agree to a payment plan with you, we will send you information including:

- Who you can contact for more help
- How long the payment plan will go for
- The amount you will pay each time

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- How many payments you need to make
- When you need to make your payments (this is also called the frequency of the payments)
- How we worked out your payments

We allow our customers the choice of weekly, fortnightly and monthly payments. Periodic reviews of payment plans are conducted and if need be, customers are contacted and informed of recommended adjustments. If changes are made, we provide written statements that include the date, amount and frequency of the updated payment plan.

We can Facilitate Centrepay Payment Option

Centrepay is a free service to help pay your bills by automatically taking an amount of money from your Centrelink payments to go toward energy bills and expenses. If you are eligible, you can choose Centrepay to contribute to your electricity payments. In this case, we can help get you set up.

Other Supports to help you pay your Energy Bill

Depending on the state or territory you live in, there are other supports to help you pay your energy bills. We actively seek out other assistance such as welfare provided by community organisations and the availability of no interest loan schemes.

What we will do:

We will tell you about other ways you can get help to pay your energy bill, such as:

- Government relief schemes
- Energy rebates
- Concession programs
- Financial counselling services

What we need you to do:

If you find out you are eligible for these programs, let us know as soon as possible so we can help you.

Our Programs and Services

As a hardship customer, you can access a range of programs and services to help you: [*Flexible Payment Options & Payment Plans, Facilitation of Centrepay Payment Option, Energy Efficiency Advice – Phone Audits, Energy Efficiency Advice - Field Energy Audits, Provision of Energy Concession & Payment Assistance Program Information, Review & Recommend most Appropriate Tariff Structure, Individual Case Management, Access to Telephone Interpreter Services, Referral to Welfare Services & Financial Counselling, Appliance Assistance*].

What we will do:

We will consider your individual situation to find the right programs (e.g. concession programs) or services that meet your needs.

We want to check you have the Right Energy Plan

We review and monitor customer consumption during their participation in the hardship program to ensure that they continue on the most appropriate energy plan and tariff and facilitate a change if necessary. The review of customer energy plan and tariff includes consideration of:

- cost effectiveness; and
- whether the customer has dedicated off peak appliances; and

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- the customer's previous rate structure (including network charge); and
- the customer's overall power usage; and
- the customer's previous bills, if available; and
- any other relevant information provided by the customer

What we will do:

When you join our hardship program, we will talk to you about your energy use and whether you are on the right plan and tariff.

If we think there is a better energy plan or tariff for you, we will:

- Explain why the alternate plan or tariff is better
- Ask if you'd like to transfer to the new plan or tariff at no cost to you

We will only talk to you about energy plans or tariffs we can offer.

We can help you Save Energy

Using less energy can save you money. We are committed to finding long term solutions that will help you identify factors that contribute to high consumption and to provide information and services that help you save money in the future.

What we will do:

When you join our hardship program, we can provide you tips to use less energy. This can be different depending on the state or territory you live in. We can direct you to general information and tips on our website which can be referred to at any time.

We can also provide you with energy efficiency advice over the phone. We can carry out detailed phone audits of your home energy use. This may identify opportunities to reduce your electricity consumption. We will also seek to educate you on energy efficiency to help you make informed decisions about your energy consumption, associated costs and ways to save.

Field Energy Audits may be offered to you if you are in long term financial hardship. Field Energy Audits aim to assist you improve energy efficiency and decrease energy consumption.

We may offer Field Energy Audits where:

- Information provided by you indicates there may be opportunities for reduction in consumption and/or improved energy efficiency within your household
- Information provided by you, your bills or a telephone audit indicate a higher than average consumption within your household with no identified reasonable cause
- Information provided by you indicates there may be energy consumption issues in relation to your premises or appliances
- Assessment by staff or your personal self-assessment indicates that you may benefit from an audit

Field Energy Audits may include:

- Assessment of personal finances and commitments, appliance energy efficiency, the property and physical surroundings, energy usage and efficiency
- Minor retrofitting with CFC bulbs and draught stoppers
- Application for URGs and/or capital grant (up to \$2000) (from the Victorian state government to assist with energy efficiency)

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- Referrals to community services
- Implementation of follow up recommendations and actions

It is Diamond Energy's preference for Field Energy Audits to be offered at your cost. However, we will assess you on a case by case basis and we are open to considering subsidising costs (partially or fully) of Field Energy Audits. Diamond energy will provide upfront quote for the likely costs of an Energy Efficiency Field Audit for the customer to consider. In some circumstances, costs might be subsidised by Diamond Energy (in part or full) where information from the customer indicates:

- You have an unusually high consumption; and
- We believe there may be opportunities for reduction in customer consumption; and
- Despite the customer reasonably investigating, they have not been able to identify the reason for the high consumption; and
- We believe that the potential reduction in consumption identified will support the customer transitioning from financial hardship to a non-financial hardship situation; and
- Where in our opinion the customer represents a "long term & valued" customer i.e. where the Customer has been our customer for more than 3 years.

Any subsidies (partially or fully) offered for Field Energy Audits will require prior authorisation by the relevant Diamond Energy Manager.

We provide individual Case Management

In some instances, we provide individual case management. This includes ongoing monitoring of payments in line with the payment plan and monitoring of consumption. Monitoring is undertaken via customer contact, regular reviews and payment default notification.

If you have joined our hardship program, we will not:

- Charge late payment fees
- Require a security deposit
- Make changes to your plan without your agreement. For example, we will not put you on a shortened collection cycle unless you agree first.

All debt recovery action, such as notices, telephone demands, late payment fees, disconnection requests, legal action and all security deposit requests are suspended while a customer participates in the hardship program. Depending on the rules in our Hardship Policy, we may be able to remove some debt, fees or charges you owe. If you miss a payment, we will contact you to see if you need help. We will contact you by:

- Sending a missed payment SMS
- Phone call
- Email or Mail

What you must do:

Tell us if your situation changes and you can no longer make the payments in your plan. We can then review your payment arrangements. Please tell us if your contact details change. We may stop helping you if you:

- Stop making payments under your plan
- Do not tell us when your contact details change

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Please note, if you have had two payment plans cancelled in the last 12 months because you did not follow your plan:

- We do not have to offer you another plan
- We might disconnect your electricity.

We provide Appliance Assistance

In some instances, you may qualify for appliance assistance. Appliance assistance is available for customers in financial hardship based on a needs assessment by our staff and/or based on information provided by a field audit. Assistance will be considered when information provided and/or an audit indicates that the use of or efficiency of an identified appliance may be contributing significantly to high energy consumption and/or that the replacement or upgrade to a more effective or more energy efficient appliance may reduce the customer's consumption and costs.

If assistance with the purchase of energy efficient appliances will assist in improved energy efficiency and reduces energy consumption, we will consider offering one of the following options to the customer:

- Referral to the Victorian Capital Grants Scheme
- Referral to an accredited No Interest Loans Scheme (NILS)
- Assisted purchase of energy efficient appliances

The level of assistance will be determined on a case by case basis depending on the needs of the customer. Assistance offered in the form of a grant and goods will be provided by a contracted third party supplier.

We can refer you to Welfare Services and Financial Counselling

Diamond Energy refers customers in circumstances of financial hardship to accredited financial counselling agencies that offer a free and confidential financial counselling service. Where possible, we will also refer you to government and non-government avenues of support that are appropriate to your needs.

We Provide Various Means of Communication.

Diamond Energy will effectively communicate about its hardship policy with customers without internet access and who live in remote areas through various means such as:

- Welcome Pack
- Diamond Energy's Hardship Policy flyer
- Invoices
- Reminder notices

These means are sent via post and are sent in a timely manner.

Diamond Energy also considers customers who may have disabilities, English as an additional language and non-English speaking customers. If required, Diamond Energy will offer interpreter/liaison services to break down any potential barriers.

We direct customers with various disabilities to the to the NDIS website for support services suited to their needs and work cooperatively with organisations designed to assist people to effectively access information.

Diamond Energy also provides information in a number of community languages (including Arabic, Cantonese, Vietnamese, Italian, Greek and Spanish) and is available through contacting Translation and Interpreter Service on 13 14 50. Please note that documentation may not be available in all languages.

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Where a customer has elected a representative to act on their behalf, Diamond Energy will engage with the customer's representative as they would with the customer and consistent with the customer's consent and instructions provided to Diamond Energy. Consent can be accepted in writing or verbally.

We protect you from Disconnection

Diamond Energy customers are protected from debt recovery action initiated by us while you are participating in the hardship program, provided you are meeting your agreed payment plan. We will not disconnect any residential customer while they are actively participating in our hardship program.

Diamond Energy will outline customer's rights and obligations in respect to their agreement in relation to the hardship program through:

- Verbal advice provided by staff
- Telephone calls from Diamond Energy staff
- Written communications

Written communications are sent to customers who enter the hardship program:

- At programme entry
- When account is reviewed
- When there is a change in agreed payment plan or change in consumption
- When there is a late payment or non-fulfilment of payments according to the agreed payment plan

As Diamond Energy understands the importance of electricity supply as an essential service, disconnection will only be a last resort should the customer be unwilling to participate in the hardship program available. You are required to contact us if you experience a change in circumstance or are unable to make payments according to the agreed payment plan.

Ceasing of Hardship Program

Diamond Energy promotes social responsibility. Where possible, our company educates customers to save on energy consumption and encourages customers to review their account on a regular basis. The staff are trained to actively listen and problem solve.

When a customer has been identified as being in hardship, efforts are made to maintain regular contact and support them through the program. When a customer fails to meet the agreed hardship program and attempts to make contact become futile, we will advise the customer in writing of their removal from the hardship program. Re-entry into the Hardship program requires:

- Initiation - Contact by the customer.
- Open discussion - A review of the customer's circumstances.
- Accommodation - Tailoring payments to suit the customer's circumstances.
- Transparency - A suggested payment schedule to make the process clear.
- Commitment - A commencement date and payment frequency set by the customer.

Our hardship program also ceases to apply to a customer when that customer is able to manage ongoing payments for electricity bills and/or finalises and pays the outstanding electricity debt. A customer may also choose to exit the hardship program at any time.

Accessibility & Information about our Hardship Policy & Program

Information about the hardship program is available by calling us on 1300 838 009 or through our website. The full version can be downloaded from our website and will be made available by email or mail to customers on request. <https://diamondenergy.com.au/hardships-payment-difficulties/>

We also ensure information about our hardship program is distributed through common forms of communication such as on our bills. It is also available to the relevant Ombudsman and any inquiring support groups in the relevant jurisdiction.

Staff Training and Resourcing to respond to Financial Hardship

Diamond Energy has staff specifically trained to handle enquiries about our Hardship Policy and program. We also continue to educate staff to identify and work sensitively and empathetically with customers in financial hardship. Training needs and status of training are captured in our training register.

Training includes:

- All frontline and debtor management staff are provided with overview of identification of financial hardship related indicators and circumstances and an overview of the Hardship Policy and components of hardship programs.
- Staff with direct responsibility for managing customers in financial hardship are provided with additional internal and / or external training, including:
 - Flexible Payment Options and Payment Plans
 - Capacity to pay assessment
 - Individual case management process
 - Government energy concession, rebate and grant options
 - Centrepay payment options
 - Information on telephone interpreter services, welfare services and financial counselling services
 - Energy efficiency, energy audits and appliance assistance options

All customer service staff have minimum level of competency they must achieve in understanding the Diamond Energy Hardship Policy and how to assist customers that may be in hardship. Resourcing to adequately cover inbound enquiries in financial hardship is continually monitored, with extra resources and back up staff allocated, as required.

Diamond Energy also maintains a minimum of one representative that includes responsibilities for managing customers in financial hardship. The associated duties are included in documented position description(s).

Key staff hardship training requirements are captured in a competency matrix and tracked through training register.

Diamond Energy recognises that all roles dealing with financial hardship customers may be demanding and stressful. A high level of focus and ongoing support is provided by senior management to monitor quality of service and internal stress levels associated with servicing financial hardship related customers. Where appropriate, customer service and hardship specialist staff are provided flexibility and discretion for additional work breaks, additional leave, internal / external counselling and support to these roles. The roles, responsibilities, training and processes that fall under financial hardship are reviewed on a regular basis.

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Hardship Customer Complaints and Disputes

Complaints

Diamond Energy is committed to providing open and effective communication to all of our customers and prompt resolution of any concern that may arise.

If you have a concern or complaint with any of Diamond Energy's products or services please call or write to us so that we can resolve the matter promptly.

However, we do realise that from time to time issues may arise that requires a complaint or dispute to be raised and to address these we have developed a complaints handling procedure, which provides:

- Easy access for customers.
- Timely and easy to understand response.
- Follow up from staff ensuring the issue is resolved.

Purpose

Implementation of the process is to:

- Provide a complainant with access to an open and responsive complaints-handling process.
- Enhance the ability of Diamond Energy to resolve complaints in a consistent, systematic and responsive manner, to the satisfaction of the complainant and the organisation.
- Enhance the ability of Diamond Energy to identify trends and eliminate causes of complaints, and improve Diamond Energy's operations.
- Help Diamond Energy create a customer-focused approach to resolving complaints, and encourage personnel to improve their skills in working with customers.
- Provide a basis for continual review and analysis of the complaints-handling process, the resolution of complaints, and process improvements made.

Escalation

A complaint will automatically be escalated if it is unable to be resolved by one of our customer service team. The first escalation will be to the Customer Service Manager.

If it is still not able to be resolved at this time it will be further escalated to a senior manager who will contact you within 5 business days in an attempt to resolve the matter.

At any time during an inquiry or complaint to Diamond Energy a customer has the right to request an escalation to the Customer Service Manager if they are unsatisfied with any aspect of the way the inquiry or complaint is being handled.

Ombudsman Referral

If we are unable to resolve your enquiry to your satisfaction you have the right to have your complaint referred to the Energy and Water Ombudsman in your State on the contact details below:

Energy & Water Ombudsman New South Wales (EWON) – 1800 246 545 or www.ewon.com.au

Energy and Water Ombudsman South Australia (EWOSA) – 1800 665 565 or www.ewosa.com.au

Energy and Water Ombudsman Queensland (EWOQ) – 1800 662 837 or www.ewoq.com.au

The Ombudsman will attempt to negotiate a resolution between yourself and Diamond Energy, should this be unable to be reached the Ombudsman can make a final and binding ruling over the matter.

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Continuous Improvement of Hardship Policy, Programs and Responses

Diamond Energy Governance and Adherence to the Hardship Policy is monitored and tracked through the monthly risk management reporting.

We regularly review our Hardship Policy and hardship programs in the context of our operational experience and statutory, market, customer and external feedback to ensure that we continuously improve our financial hardship responses.

Summary of Our Hardship Program Services

The services included in the hardship program provided to short term and long term financial hardship customers are shown below.

Table 1: Services Included in Diamond Energy Hardship Program

| Hardship Program Services | Short Term Hardship | Long Term Hardship |
|---|----------------------|--------------------|
| Flexible Payment Options & Payment Plans | ✓ | ✓ (extended) |
| Facilitation of Centrepay Payment Option | | ✓ |
| Energy Efficiency Advice – Phone Audits | | ✓ |
| Energy Efficiency Advice - Field Energy Audits | | ✓ |
| Provision of Energy Concession & Payment Assistance Program Information | Available on request | ✓ |
| Review & recommend most appropriate tariff structure | | ✓ |
| Individual Case Management | | ✓ |
| Access to Telephone Interpreter Services | ✓ | ✓ |
| Referral to Welfare Services & Financial Counselling | | ✓ |
| Appliance Assistance | | ✓ |

Effective: August 2019