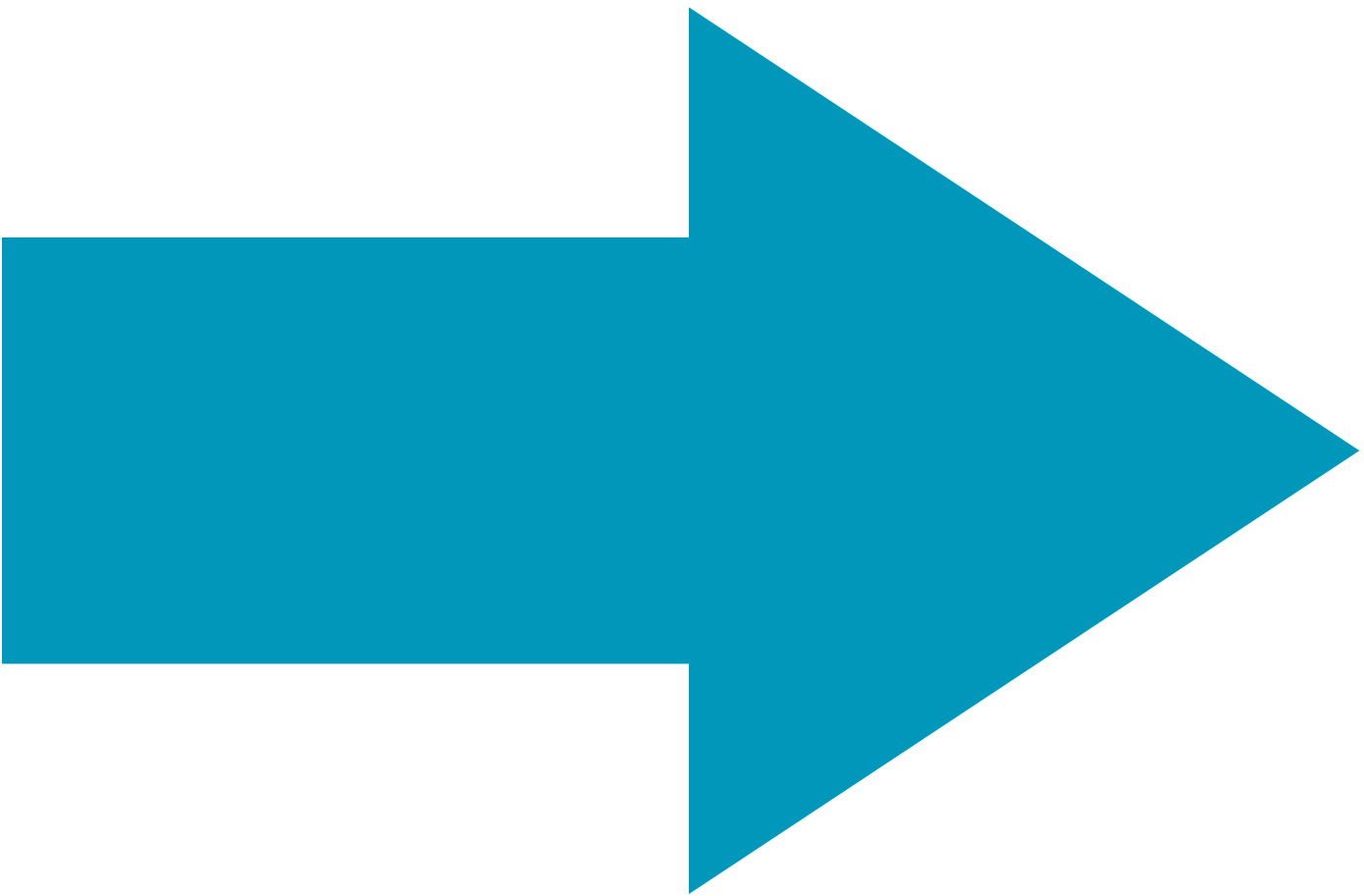




CUSTOMER FAMILY VIOLENCE POLICY

Version 2.0



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1. Introduction

The purpose of this Customer Family Violence Policy (the Policy) is to formalise and document Shell Energy Operations Pty Ltd (Shell Energy's) approach to ensuring that it, and its staff, comply with all applicable laws and regulation as they relate to the family violence obligations under the Australian retail energy laws.

Shell Energy's ongoing energy retail licence is contingent on the company successfully implementing and maintaining an effective Customer Family Violence Policy meeting the minimum standards of conduct relating to:

- training
- account security
- customer service
- debt management
- external support
- evidence.

The Policy is supported by a broader compliance management framework developed by Regulatory Affairs, which incorporates:

- procedures for monitoring and reporting on performance indicator and compliance data,
- compliance obligations registers
- compliance reference materials
- training manuals and a training program

Shell Energy is committed to assisting customers affected by family violence and who are finding it difficult to manage their energy usage bills.

1.1 Ongoing review

Shell Energy will review this Policy every two years and as necessary to ensure that it is operating effectively and whether any changes are required to the Policy.

2. Family Violence Definition

Family violence meaning is defined in energy laws as:

- a. behaviour by a person towards a family member of that person if that behaviour—
 - i. is physically or sexually abusive; or
 - ii. is emotionally or psychologically abusive; or
 - iii. is economically abusive; or
 - iv. is threatening; or
 - v. is coercive; or
 - vi. in any other way controls or dominates the family member and causes that family member to feel fear for the safety or wellbeing of that family member or another person or
- b. behaviour by a person that causes a child to hear or witness, or otherwise be exposed to the effects of, behaviour referred to above.
- c. Act of abuse against a person if it results in or is intended to result in -

- i. physical injury; or
- ii. emotional or psychological harm; or
- iii. an unreasonable and non-consensual denial of financial, social or personal autonomy; or
- iv. damage to property in the ownership or possession of the person or used or otherwise enjoyed by the person.

In the context of Shell Energy, family violence support is extended to an affected customer who is any former or current customer who is identified as being affected by family violence.

2.1 How would Shell Energy identify these customers and provide assistance?

The nature of our business means that we are most likely (but not limited to) to encounter customers experiencing family violence when: -

- they are experiencing financial difficulties and unable to pay their account or
- they request further security of their personal information on their account.

We aim to engage in safe and meaningful communication with our customers to identify possible signs of family violence. These signs may not always indicate an affected customer but will be taken into account on a case-by-case basis.

3. Policy

3.1 Purpose

This policy outlines our approach to ensure that all customers regardless of their circumstances will not face judgement and will be treated with understanding and respect at all times.

Shell Energy recognises the need for staff to be sensitive to any customer experiencing violence or abuse in their family life. We are aware of the impact family violence may have on the ability of some business customers to pay their electricity usage bills and will assist those experiencing financial difficulties as a result of family violence.

Shell Energy will provide information and advice about appropriate community services and support e.g. counselling, legal, police via our website. Considerations of provision of this information will take into account manners that is safe, respectful and appropriate given the circumstance.

Customers experiencing family violence should contact us so we can assist them as early as possible to find a workable solution that is fair and equitable whilst ensuring their privacy in accordance with the Family Violence Protection Act.

3.2 Customers

Customers have the right to expect and receive confidential and respectful conversations and be assured that all personal information will be kept confidential in line with relevant legislation. Any business customer having difficulty paying their electricity usage bills as a result of family violence should contact us to have a confidential conversation on ways in which we may assist them.

We will:

- assess customers on a case-by-case basis based on a meaningful two-way communication (through training).

- ensure contact information and personal details of customers experiencing family violence is secure including from joint account holders.
- will agree on a safe method of communication preferred by affected customers which will be recorded on the affected customer's file.
- ensure processes are in place so customers avoid having to repeatedly disclose their experience of family violence.
- work with affected customers on the best way to manage payment difficulties including using Centrepay (where applicable)
- take into account the impact of debt recovery on affected customers
- provide affected customers with information on the availability of external family violence support services on our website
- have regard to customer safety as far as their safety is impacted by them being an affected customer and take into account their particular circumstances
- not require an affected customer to provide any documentary evidence in order to provide them protection under energy retail laws
- commit to the continual review of our policy. This policy is scheduled to be reviewed no later than every two years from the date of Board of Directors approval, or when required.

3.3 Training

Training will be provided for any staff (employees, contractors, agents etc) who engage with the affected customer by any means of communication; whether a manager of said staff member; or someone who is responsible for systems and processes that guide interaction with a customer. Staff will be trained in awareness of family violence and where a customer is identified as experiencing family violence the relevant staff will handle their requests sensitively and confidentially and in accordance with this policy.

Training will cover:

- The nature and consequences of family violence
- Shell Energy's Family Violence Policy
- How to identify affected customers
- How to engage effectively and appropriately with a customer affected by family violence
- Protection of customer information and consent requirements (to the extent the information is required by law or by a lawful requirement of any government or governmental body, authority or agency having jurisdiction over our business, consent may not be required)
- How we can support the customer e.g. key communication contact, flexible payment options, additional privacy protections

Support services: <https://shellenergy.com.au/wp-content/uploads/2021/01/SE1265-Family-Violence-Support-Services.pdf>

4. Policy Information

Policy Status	Active
Policy Released	V1.0 8 November 2019
Version Approved	V1.0 8 November 2019
Last Review Date	V2.0 28 April 2023
Approval Body	Shell Energy Executive General Manager
Endorsement Body	EGM Corporate Services
Related Policies	
Policy Maintained by:	Regulatory Affairs



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