

# FAMILY VIOLENCE POLICY

## 1 PURPOSE

Ellis Air Connect ("the Company") recognises the serious and devastating impact of family violence. This policy sets out our commitment to supporting affected customers, ensuring their safety, maintaining the confidentiality of their information, and complying with our obligations under the National Energy Retail Rules (NERR) and the Australian Energy Regulator (AER) Family Violence Guidance.

## 2 SCOPE

This policy applies to all residential and small business customers, including former customers, who may be affected by family violence ("affected customers").

## 3 DEFINITIONS

**Family Violence:** As defined by the NERR, family violence has the same meaning as "domestic abuse" under the Intervention Orders (Prevention of Abuse) Act 2009 (SA), encompassing physical, emotional, psychological, financial, and other forms of abuse.

**Affected Customer:** Any current or former small customer who may be impacted by family violence.

**Affected Customer Information:** Any information that may be used to identify, communicate with, or locate an affected customer, including their financial, personal, or contact details.

## 4 POLICY COMMITMENTS

### 4.1 Prioritisation of Safety

We will prioritise the safety and wellbeing of affected customers in all dealings. In every interaction, we will:

- Be guided by the customer's expressed safety needs.
- Apply flexible processes to support their individual circumstances.

### 4.2 No Requirement for Documentary Evidence

We will not require affected customers to provide documentary evidence of family violence to access support under this policy.

### 4.3 Training

All relevant staff will undertake mandatory, regular training on:

- Identifying family violence indicators.
- Providing appropriate assistance.
- Protecting affected customer information. Training will be tailored to staff roles and refreshed periodically to align with leading practice.

### 4.4 Protecting Affected Customer Information

We will:

- Not disclose or provide access to affected customer information without their consent, unless required by law.
- Apply enhanced security measures to protect affected customer data.
- Ensure contractors, agents, and third parties comply with the same obligations.

### 4.5 Debt Management, Hardship, and Financial Assistance

Affected customers will be offered:

- Tailored payment plans.
- Waivers of fees, charges, or debt, where appropriate.
- Access to our hardship program with flexibility around assessment and program entry.
- Assistance with affordable and sustainable payment methods.

### 4.6 De-energisation Protections

We will take into account the impact of family violence before proceeding with any disconnection for non-payment. Disconnection will only occur as a last resort.

#### **4.7 Communication**

We will communicate with affected customers:

- Using their preferred method wherever possible.
- In a manner that avoids the need for repeated disclosures.
- With sensitivity, respect, and confidentiality.

#### **4.8 External Support Services**

We will provide affected customers with information about specialist external support services, such as:

- 1800RESPECT (1800 737 732)
- Lifeline (13 11 14)
- Local domestic and family violence services

### **5 REVIEW AND UPDATES**

This policy will be reviewed at least every two years and updated as necessary to:

- Reflect changes in law and regulations.
- Maintain alignment with leading industry practices.
- Incorporate feedback from affected customers, advocacy groups, and regulators.

### **6 RELATED POLICIES AND DOCUMENTS**

- Hardship Policy
- Privacy Policy
- Complaints and Dispute Resolution Policy

### **7 REFERENCES**

- National Energy Retail Rules (Version 42)
- AER Family Violence Guidance (February 2025)
- National Energy Retail Law (NSW, SA, QLD)