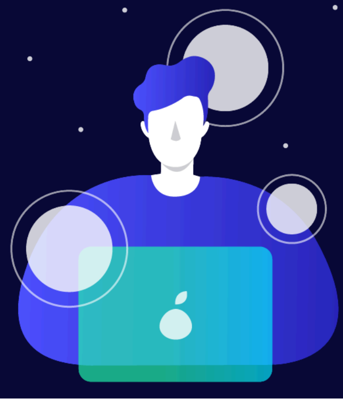
greenbank environmental

BESS 1 – 5

Code of Conduct



Purpose

Greenbank Environmental Trading Pty Ltd (Greenbank) is an Accredited Certificate Provider (ACP) under the NSW Peak Demand Reduction Scheme (PDRS).

Greenbank is accountable for activities undertaken by its representatives in connection with the PDRS. Representatives may include installers, retailers, sales representatives, site assessors, project managers, administrative personnel, Demand Response Aggregators (DRAs), contractors and other parties involved in promoting, delivering, installing, onboarding or collecting evidence for PDRS battery activities.

This Code of Conduct applies to representatives involved in BESS1, BESS2, BESS3, BESS4 and BESS5 activities.

All representatives must comply with this Code of Conduct, Greenbank procedures, the PDRS requirements applicable to their activities, relevant legislation, the Australian Consumer Law and applicable technical and safety standards.

1. PDRS BESS Activities

The PDRS encourages households and businesses to undertake eligible activities that create capacity to reduce electricity demand during peak periods.

The battery activities covered by this Code are:

BESS1 – Installation of a new behind-the-meter battery energy storage system at an eligible single dwelling residential or small business site.

BESS2 – Onboarding an eligible behind-the-meter battery energy storage system with a Demand Response Aggregator.

BESS3 – Installation of a new behind-the-meter battery energy storage system in an eligible apartment building.

BESS4 – Installation of a new behind-the-meter battery energy storage system at an eligible small or medium business site.

BESS5 – Installation of a new behind-the-meter energy storage system at an eligible commercial or industrial business site.

Representatives are responsible for understanding the requirements that apply to the specific activities they undertake.

2. Professional Conduct

All Greenbank representatives must:

- Act professionally, honestly and fairly.
- Treat customers respectfully.
- Perform only work they are appropriately qualified, licensed, accredited and authorised to perform.
- Comply with Greenbank procedures and evidence requirements.
- Comply with applicable PDRS requirements, legislation and Australian Standards.
- Cooperate with Greenbank compliance reviews, audits and requests for information.
- Raise any uncertainty regarding eligibility or compliance with Greenbank before proceeding.
- Never knowingly submit or support an ineligible or non-compliant PDRS claim.

3. Customer Engagement

When engaging with a customer, representatives must clearly identify themselves and the business they represent.

Customers must be provided with accurate information regarding the relevant PDRS activity and must be given sufficient information to make an informed decision about participating.

Where required, representatives must explain:

- The purpose of the PDRS.
- The relevant BESS activity.
- The role of Greenbank as the ACP.
- The purpose of the Capacity Holder nomination.

- The equipment or service being offered.
- Any mandatory eligibility requirements.
- Any applicable minimum payment or contract requirements.
- The installation or onboarding process.
- Relevant after-sales support and complaint processes.
- That IPART or an auditor may request information about the activity.

Participation in the PDRS is voluntary.

4. Representing the PDRS and Greenbank

Representatives **must not identify themselves as a representative of the PDRS, ESS, IPART or the NSW Government.**

Representatives must not state or imply that they work for, have been sent by, or are acting on behalf of the NSW Government or IPART.

Where applicable, customers must be informed that **Greenbank is the Accredited Certificate Provider responsible for verifying eligible activities and creating Peak Reduction Certificates (PRCs).**

Representatives must accurately describe their own role and the organisation they represent.

5. Australian Consumer Law

All representatives must comply with the Australian Consumer Law when promoting, selling, supplying or installing equipment or services.

Representatives must not engage in:

- Misleading or deceptive conduct.
- False or misleading representations.
- Unconscionable conduct.
- Unfair sales practices.
- Pressure selling.
- Misrepresentation of government involvement or endorsement.

Representatives must not guarantee that a customer will receive a PDRS incentive or that PRCs will be created before all relevant eligibility and evidence requirements have been satisfied and verified.

Information provided regarding equipment, warranties, savings, incentives, VPP participation, customer payments and eligibility must be accurate.

6. Unsolicited Doorknocking

PDRS activities must not be undertaken as a result of unsolicited doorknocking.

Representatives must not undertake unsolicited door-to-door sales or marketing in connection with PDRS activities.

All representatives must comply with Greenbank's customer acquisition requirements and applicable consumer protection laws.

7. Customer Information and Fact Sheets

Where a PDRS fact sheet is required for an activity, the applicable fact sheet must be provided to the customer at the required time.

Representatives must follow Greenbank's current requirements for providing and evidencing customer fact sheets.

Evidence that the required information was provided to the customer must be retained where required.

Representatives must not omit or misrepresent mandatory information in order to secure a sale or customer agreement.

8. Capacity Holder Nomination

Greenbank must hold the appropriate Capacity Holder rights before PRCs can be created.

Representatives must ensure that:

- The correct person completes the applicable nomination.
- The information entered in the nomination is accurate.
- The nomination is completed within the timeframe applicable to the relevant BESS activity.
- The person signing has the appropriate authority to do so.
- Required evidence supporting the Capacity Holder is collected.

Representatives must never:

- Sign a customer's nomination on their behalf.
- Backdate a nomination.

- Alter a signed nomination without appropriate authority.
- Provide false or misleading information on a nomination.

Activity-specific Greenbank procedures must be followed for nomination timing and evidence requirements.

9. Eligibility Must Be Confirmed

Representatives must understand the eligibility requirements applicable to each BESS activity they undertake.

Eligibility must be considered before making firm representations to a customer or proceeding with an activity.

Where there is uncertainty regarding:

- Site eligibility.
- Customer or Capacity Holder eligibility.
- Battery eligibility.
- Battery capacity.
- Existing equipment.
- Previous battery installations or claims.
- Product approval.
- Warranty requirements.
- Minimum payment requirements.
- Planning approvals.
- Network approvals.
- DRA or VPP eligibility.
- Installation requirements.
- Required evidence.

The representative must seek clarification from Greenbank before proceeding or advising the customer that the activity is eligible.

10. Installer Qualifications and Licensing

Installation work must only be undertaken by appropriately qualified, licensed and, where required, accredited persons.

Installers must maintain all licences, qualifications and accreditations required for the activities they perform.

Where Solar Accreditation Australia (SAA) accreditation is required for the relevant activity, the installer must hold the appropriate current accreditation.

Representatives must provide Greenbank with evidence of licences, accreditations and qualifications when requested.

A person must never allow another individual to perform regulated work using their licence, accreditation or identity.

11. Installation Safety and Standards

All installation work must comply with relevant legislation, electrical safety requirements, manufacturer instructions and applicable Australian Standards.

This includes, where relevant:

- AS/NZS 5139.
- AS/NZS 3000.
- Electrical licensing requirements.
- Network requirements.
- Planning requirements.
- Manufacturer installation instructions.
- Applicable fire and safety requirements.

Installers must complete required risk assessments and appropriately address site-specific hazards.

Where a risk-control measure is required, such as a bollard, barrier, enclosure, fire-resistant construction, equipment relocation or additional signage, the control must be installed and appropriately evidenced.

12. Planning and Network Approvals

Where planning, development, network or other approvals are required for an activity, they must be obtained in accordance with the applicable PDRS and Greenbank requirements.

Representatives must not advise Greenbank that an approval has been obtained unless appropriate evidence is available.

Installation must not proceed where a required approval has not been obtained.

13. Evidence Integrity

All evidence submitted to Greenbank must be genuine and must relate to the actual customer, site, equipment and activity being claimed.

Representatives must not:

- Fabricate evidence.
- Alter dates or timestamps.
- Alter or manipulate GPS information.
- Reuse photographs from another installation or site.
- Substitute equipment or serial numbers.
- Falsify customer or installer signatures.
- Alter invoices or payment records.
- Submit false compliance documentation.
- Create misleading evidence after an activity has occurred.
- Knowingly provide incomplete or inaccurate information.

If an error or missing evidence is identified, the representative must notify Greenbank.

Evidence must never be recreated, altered or fabricated in an attempt to make an ineligible activity appear compliant.

14. Photographic Evidence

Photographs required by Greenbank must be collected in accordance with the applicable activity checklist..

Where geo-tagged photographs are required:

- Location services must be enabled.
- Photographs must relate to the correct installation address.
- Required date/time and location metadata must be retained.
- Photographs must be clear and in focus.
- Equipment labels and serial numbers must be readable where required.
- Photographs must show sufficient context to demonstrate the requirement being evidenced.
- Photographs must be taken at the appropriate stage of the activity.

Leaving a site without collecting required photographic evidence may result in the activity being ineligible for PRCs.

15. Equipment and Serial Numbers

Representatives must accurately record equipment information required by Greenbank.

This may include:

- Manufacturer.
- Make.
- Model.
- Serial number.
- Usable battery capacity.
- Battery inverter details.
- Other identifying information required for the activity.

Serial numbers must correspond to the equipment actually installed or participating in the relevant activity.

Equipment identification must be sufficiently clear to allow Greenbank to associate the equipment with the individual implementation.

16. Approved and Banned Equipment

Representatives must ensure equipment satisfies the applicable PDRS requirements before proceeding.

Where an approved product list applies, the equipment must meet the applicable approval requirements as at the relevant Implementation Date.

Representatives must not proceed with equipment, a VPP or a Demand Response Aggregator that has been banned or otherwise made ineligible by the Scheme Administrator.

Where Greenbank advises that equipment, a supplier, VPP or DRA has been suspended or is no longer accepted, representatives must stop submitting affected activities until advised otherwise.

17. BESS2 – Demand Response and VPP Activities

Representatives undertaking BESS2 activities must follow Greenbank's current BESS2 requirements.

This includes ensuring that:

- The site and customer are eligible.
- The relevant electricity account holder is correctly identified.
- The battery meets applicable eligibility requirements.
- The customer enters into an eligible demand-response contract.
- The DRA meets applicable requirements.

- The battery is successfully onboarded.
- Required evidence of DRA control or response is obtained.
- Greenbank is appropriately nominated as Capacity Holder.
- Required contract, warranty and evidence requirements are satisfied.

Representatives must not describe a battery as successfully onboarded where the required onboarding and demand-response evidence has not been obtained.

18. Customer Payments

Where a minimum customer payment applies to an activity, the payment must be genuine and comply with the applicable PDRS and Greenbank requirements.

Representatives must ensure:

- The required customer contribution is paid.
- Payment is made by the appropriate purchaser.
- Acceptable evidence of payment is retained.
- The payment is not subsequently reimbursed or credited contrary to scheme requirements.
- The customer is not provided with an arrangement intended to artificially satisfy a minimum payment requirement.

Invoices and payment evidence must accurately reflect the transaction that occurred.

19. Customer Service and Complaints

Representatives must provide appropriate after-sales assistance and customer support.

Customers must be provided with appropriate contact details and information about how complaints can be raised.

Representatives must:

- Respond appropriately to customer enquiries.
- Deal with complaints professionally.
- Take reasonable steps to resolve complaints.
- Provide appropriate assistance regarding faulty equipment or services.
- Escalate relevant complaints to Greenbank where required.

Complaints involving potential PDRS non-compliance, misleading conduct, safety issues, Greenbank or PRC creation must be promptly escalated to Greenbank.

20. Records, Audits and Compliance Reviews

Representatives must provide Greenbank with all documentation and evidence required to support PDRS activities.

Activities and evidence may be subject to:

- Greenbank validation.
- Internal compliance review.
- Independent audit.
- IPART audit or review.
- Regulatory investigation.

Representatives must cooperate with legitimate requests for information and provide requested information within required timeframes.

Representatives must not obstruct, mislead or provide false information during an audit or compliance review.

21. Representative Details and Insurance

Representatives must provide Greenbank with accurate and current information relevant to their role.

This may include:

- Name and contact information.
- Company details.
- Role and relationship with Greenbank.
- Licences.
- Qualifications.
- Accreditations.
- Training records.
- Insurance details.
- Responsibilities for PDRS activities.

Where required, relevant representatives must maintain public liability and product liability insurance of at least $5 million.

Representatives must advise Greenbank where a required licence, accreditation, qualification or insurance policy expires, is suspended or is cancelled.

22. Reporting Compliance Concerns

Representatives must promptly notify Greenbank if they become aware of a potential compliance issue.

This includes:

- Suspected fraudulent evidence.
- False declarations.
- Incorrect customer information.
- Ineligible equipment.
- Incorrect serial numbers.
- Duplicate claims.
- Unlicensed or unauthorised work.
- Unsafe installations.
- Significant customer complaints.
- Equipment recalls.
- Banned equipment.
- Non-compliant VPP or DRA arrangements.
- Any other circumstance that may result in PRCs being improperly created.

Representatives must not conceal known compliance issues.

23. Non-Compliance

Failure to comply with this Code, Greenbank procedures or applicable PDRS requirements may result in Greenbank taking compliance action.

Depending on the nature and seriousness of the issue, Greenbank may:

- Request additional information or evidence.
- Place claims on hold.
- Reject affected claims.
- Require additional training.
- Increase compliance monitoring.
- Suspend access to Greenbank systems.
- Suspend or terminate participation in Greenbank programs.
- Take any other action reasonably required to protect Greenbank and the integrity of the PDRS.
- Report matters to IPART or another authority where required.