

Telecommunications Consumer Protections Code Compliance Plan

Redcoal Pty Ltd
ABN 68 090 244 590

PART 1 – OBJECTIVES AND RESPONSIBILITIES

Objectives of this Compliance Plan

This compliance plan sets out the general principles that Redcoal Pty Ltd (**Company**) will apply to its telecommunications activities in order to foster and maintain a culture of compliance with all requirements of the Telecommunications Consumer Protection Code (**TCP Code**). This compliance plan does not establish specific compliance targets or metrics but aims to establish the core compliance principles that are to be adhered to in the day to day operations of the Company.

Statement of commitment

The Company confirms its commitment to effective compliance with the TCP Code at all staff and management levels. This commitment to compliance with the TCP Code is aligned with the strategic and business objectives of the Company and is endorsed by the CEO. Appropriate resources will be allocated to develop, implement and maintain a company-wide culture of compliance with the TCP Code.

Key Responsibilities

Compliance with the TCP Code will be the joint responsibility of all staff of the Company. All employees will perform their duties in a manner that ensures that compliance with the TCP Code is a key driver and are encouraged to be vigilant and proactive in fostering a commitment to compliance amongst other employees.

PART 2 – IMPLEMENTATION OF COMPLIANCE MEASURES

Training and Awareness

The Company will ensure that competence and training needs are identified and that appropriate measures will be taken to address these needs in order to enable employees to fulfil their TCP Code compliance obligations.

Practices and behaviours that support compliance will be encouraged and behaviour that that compromises compliance efforts will not be tolerated.

Where necessary, the Company may choose to allocate specific staff with the responsibility for ensuring that compliance with the TCP Code is adhered to and training on TCP Code awareness is provided, be that in addition to their existing roles, or in the form of a dedicated Compliance Manager role.

Mitigation of non-compliance

All staff of the Company must report any instances of non-compliance with the TCP Code to management or to the delegated Compliance Manager.

In the event that the Company identifies a risk of ongoing non-compliance, it will identify the risk to Communications Compliance and will engage with Communications Compliance to consider options for mitigating the identified risk.

Ongoing compliance initiatives

In order to fulfil its commitment to TCP Code compliance, the Company has implemented the following initiatives:

- Review of the Company's website at least annually for TCP Code compliance;
- Inclusion of TCP Code compliance within the Company's Regulatory Policy; and
- Staff training and TCP Code awareness initiatives.

PART 3 – MONITORING AND REPORTING

Customer Complaints

The Company will use information on customer complaints made either directly to the Company or made via the Telecommunications Industry Ombudsman as a means of measuring the effectiveness of processes that have been introduced to ensure TCP Code compliance. The Company is committed to the satisfactory resolution of customer complaints in a timely manner that is reflective of its commitment to TCP Code compliance.

The Company will utilise annual reporting to determine a measurement for TCP Code compliance.

Records of Compliance

The Company will fulfil its obligation under the TCP Code to keep a record of all complaints received from its customers. This record will be reviewed at regular intervals to measure levels of TCP Code compliance and to identify where certain processes may lack appropriate TCP Code compliance measures.