PART 1 – TRAINING FOR REPRESENTATIVES

Code of Conduct

Code of conduct – induction training

Greenbank is accountable for all activities conducted under our accreditation. All people who engage in VEEC activities (including selling and installing equipment and collecting evidence) are considered to be Partner Representatives of Greenbank. Representatives must act in accordance with the code.

We are required to provide you with adequate training and guidance to ensure you conduct yourself according to the requirements, the Australian Consumer Law 2012 and in line with the VEU Code of conduct.

What is the Code of Conduct?

The Victorian Energy Upgrades program code of conduct ('the code') outlines the mandatory behaviours and actions industry participants must adhere to when engaging with consumers in activities that may lead to the creation of a Victorian Energy Efficiency Certificate ('certificate'). It took effect from 1 July 2022. The code outlines what accredited persons and scheme participants must do at various points along the certificate creation lifecycle. Though many of these obligations are not new, a certificate must not be created unless the code has been followed. The code was made under Sections 17(3)(d) and 75 of the Victorian Energy Efficiency Target Act 2007 ('the Act'). The Act gives the Essential Services Commission ('the commission') a range of functions, including to accredit persons who can create certificates, to check and administer the creation of certificates, and to undertake audits of the creation of certificates. The commission does this through the Victorian Energy Efficiency Target Regulations 2018, which now include the code.

What is the Scope of the code?

An **accredited person** "Greenbank" is a person or organisation approved by the commission to create certificates for a range of prescribed activities. Accredited people (and their employees undertaking relevant activities) are responsible for carrying out activities in compliance with the Victorian Energy Upgrades program's legislative framework, which includes the code.

A scheme participant this is - you!

Any person (other than an accredited person) who undertakes any or part of any prescribed activity on behalf of an accredited person. This stays true even if the accredited person's accreditation is suspended, expired, or cancelled, or if their actions do not meet the full requirements of a prescribed activity. Anyone claiming to undertake any part of a prescribed activity on behalf of an accredited person is also a scheme participant. Under the code, **anyone who undertakes any relevant activities** is considered to be a scheme participant. Third parties do not need to have a formal agreement with an accredited person in place to be considered a scheme participant.

Regulated actions include lead generation and marketing for a prescribed activity, entering into a contract for a prescribed activity, undertaking any part of a prescribed activity, and any after-sales services or follow-on activities related to a prescribed activity.

Prescribed activities are those activities named in Regulation 10 of the VEET Regulations. They are energy efficiency activities which are recognised under the Victorian Energy Upgrades program to reduce greenhouse gas emissions.

What is the Purpose of the code?

The purpose of the code is to:

- regulate the conduct of accredited persons and scheme participants carrying out a relevant activity under the Victorian Energy Upgrades program
- ensure that accredited persons and scheme participants provide sufficient information to a person to enable them to properly understand, and make informed decisions about:
  - the Victorian Energy Upgrades program
  - a relevant activity
  - their rights and obligations under the Act, the VEET Regulations and the code
  - the obligations of accredited persons and scheme participants under the Act, the VEET Regulations and the code Introduction Essential Services Commission VEET Code of Conduct Guideline 3
- ensure accredited persons have a dispute resolution framework in place to handle complaints by energy consumers in relation to relevant activities.

The code puts the consumer's welfare at the centre of how accredited persons and scheme participants deal with energy consumers in Victoria. It does this by requiring accredited persons and scheme participants who are carrying out relevant activities to:

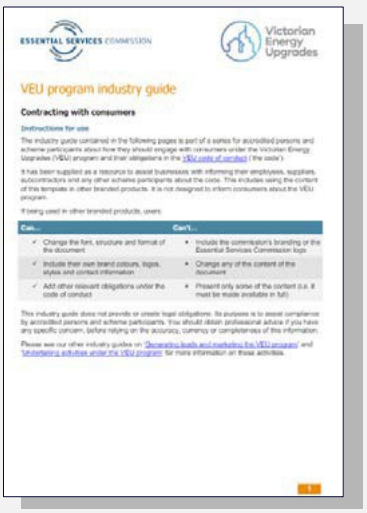
- act in a professional and ethical manner
- protect consumers' interests and promote confidence in the Victorian Energy Upgrades program
- meet high standards of conduct in their dealings with consumers
- comply with:
  - the Act
  - the VEET Regulations
  - the Victorian Energy Upgrades Specifications1
  - the code
  - the Australian Consumer Law (Victoria).

Together, these obligations define a minimum standard of service energy consumers can expect when engaging with the Victorian Energy Upgrades program. From 1 May 2024, the code imposes a ban on accredited persons and scheme participants engaging in 'cold call' telemarketing and doorknocking practices. Failure of any accredited person or scheme participant to comply with the code at any stage means a certificate cannot be created for that activity.

Know your obligations fact sheet and industry guide is provided to you at the time of registration with Greenbank.


Know your obligations under the Victorian Energy Upgrades program

Conducting installations and other work


ESSENTIAL SERVICES COMMISSION

Victorian Energy Upgrades

VEU program industry guide

Contracting with consumers

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When engaging with customers, you must:

Consider Consumers

Accredited persons and scheme participants must consider customers' capacity to understand the information being provided to them at all times during relevant activities. They are encouraged to provide customers with an opportunity to ask questions, and to look for indications that customers have any difficulty in understanding the information provided to them. If in doubt, the accredited person or scheme participant should not proceed with the relevant activity. Certificates must not be created if you think the customer did not understand or consent to those activities taking place.

Lead generation includes any activity carried out for the purposes of identifying, attracting or engaging with persons who may enter into a contract as part of the VEU program. Any activity relating to the promotion, sale or supply of a prescribed activity related to the VEU program is considered marketing. Any lead generation or marketing as defined by the code of conduct must be carried out in line with the obligations outlined in the code.

Always be identifiable.

An accredited person or scheme participant must always wear an identification card when carrying out a lead generation or marketing activity in relation to a prescribed activity in person.

This card must include the person's:

- photograph
- full name
- contact details
- Australian Business Number (ABN).

If a scheme participant is carrying out lead generation or marketing activities for an accredited person, their card must also include the name, trading name and ABN of the accredited person or contractor they are working for.



Do not engage in high-pressure tactics An accredited person or scheme participant involved in lead generation or marketing activities for relevant activities must not use high pressure tactics on anyone.

This includes:

- pressuring, bullying or manipulation
- acting in an aggressive or coercive manner
- asking questions of a person that are intrusive, unreasonable, or not relevant to the prescribed activity
- staying on the premises after being told that the consent to contact a resident is withdrawn or no longer valid, or after being told to leave the premises.

Use common sense, you must:

- Clearly identify yourself to the customer, explain the reason for your visit/phone call,
- Clearly identify the company you work for,
- Properly explain the ESS to the customer, the reason why they could be eligible to receive a discounted energy efficiency upgrade,
- Explain any mandatory requirements that must be met in order for the installation to be eligible,
- Provide details of the Solution Provider's offer, and include information on the make, model and electrical characteristics of the end-user equipment offered,
- Identify that Greenbank is the ACP that will verify and create the VEECs resulting from the activity,
- Explain that auditors may request information from the customer to verify VEECs are properly created at any time, and
- Provide adequate customer service and fully resolve all complaints.

IMPORTANT

Cold-call telemarketing ban to apply from 1 May 2024

IMPORTANT DATE

Door-knocking ban to apply from 1 August 2024

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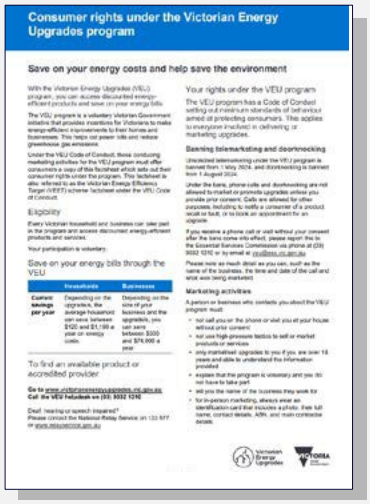
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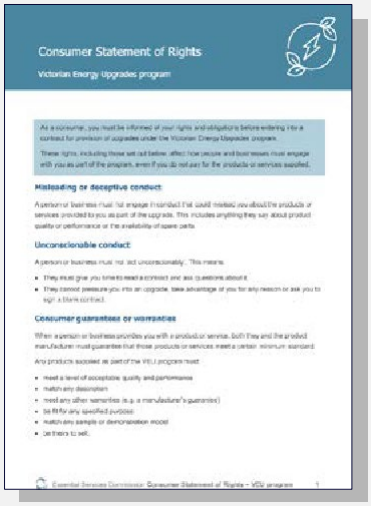
Before entering into a contract – VEU Statement of rights must be given to consumer and fact sheets these are within our portal on our website and and can be sent via emailed. You would of received these fact sheets upon our email welcoming you with your smart software logins.

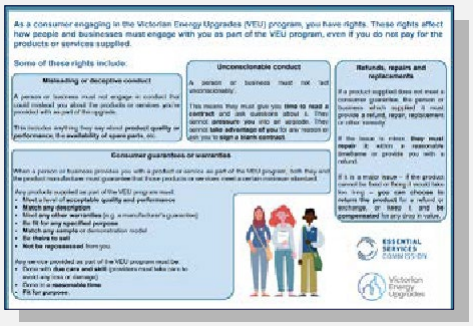
Before entering into a contract with a consumer for a relevant activity at a residential premises, a scheme participant you must ensure that the consumer:

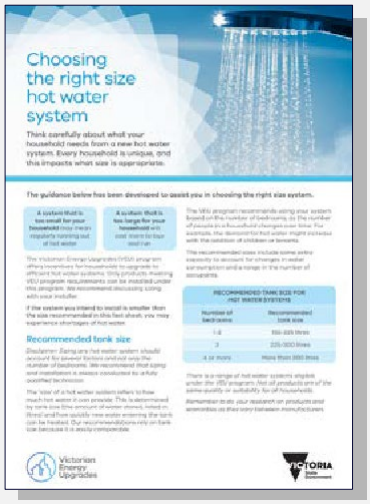
- is given a statement of their rights and obligations in relation to the contract. This includes any rights and obligations under:
  - the Act
  - the VEET Regulations
  - this code – the Australian Consumer Law (Victoria)
- is given clear and accurate information about the terms and conditions of the contract relating to the relevant activity, including:
  - any standard fees and charges
  - payment terms
  - any consequences for failure to meet the payment terms
  - any applicable cooling off periods
- has been informed of and understands the relevant activity
- consents to undertake the relevant activity.

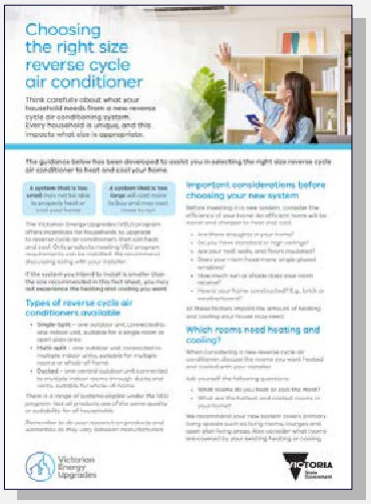
Consumer fact sheets mandatory to be received by consumer before installation.

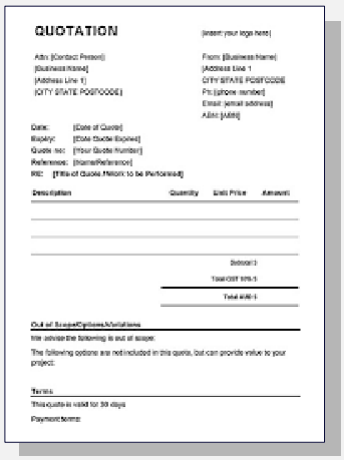












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Undertaking prescribed activities - notice to residents/ quote stage.

An accredited person or scheme participant must not undertake any relevant activity at a residential premises unless they have taken reasonable steps to give notice to a resident of each of the premises likely to be directly affected by the activity.

The code requires that accredited persons and scheme participants take reasonable steps to give reasonable notice to each resident of an affected premises. The notice to residents must at least give specific details on each of the following:

- the nature of the work
- the date and time it will be undertaken
- essential services that may be affected if any
- the consumer on whose behalf the work is being undertaken
- the full name, telephone number and business email address of the accredited person or contractor

If the work is being conducted on behalf of an accredited person, the full name, telephone number and business email address of the person conducting the work must also be given.

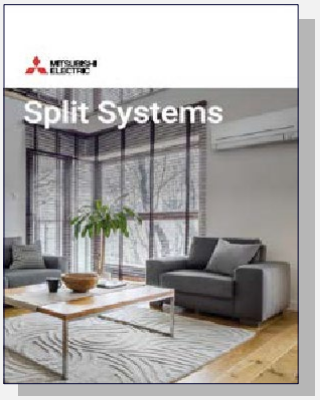
Time of undertaking prescribed activity

Accredited persons and scheme participants undertaking relevant activities must ensure that all reasonable steps are taken to commence, undertake and complete their work on the dates and at the times agreed with the consumer. This includes all installation, replacement and decommissioning activities related to the work. If the work cannot be completed at the agreed time on the agreed dates, the accredited person or scheme participants must ensure that the consumer is advised as soon as practicable.

Information upon completion - after sales process

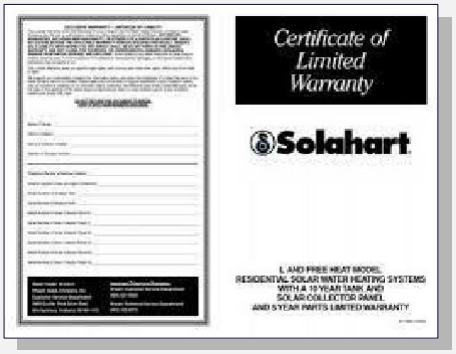
On completion of a relevant activity, the accredited person or scheme participant who completed the work must give the consumer the following information:

- Assignment Form
- Warranty and product manuals and information
- Maintenance and servicing information
- Invoice purchase
- Dispute resolution information
- Electrical and plumbing compliance certificates









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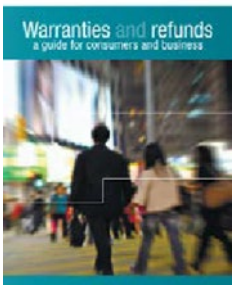
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Greenbank enforces a high expectation for our installers and suppliers to ensure customer satisfaction. You must have a sales procedure which includes:

1. **Follow-Up Call**: Contact the customer within a week of installation to confirm their satisfaction and address any issues.
2. **Issue Resolution**: Promptly address any reported problems or complaints. Installers and suppliers are expected to respond within 24 hours. This also includes refund management responding within 5 business days and resolved within 20 business days.
3. **Warranty Service**: Ensure all products and services provided are covered under warranty. Any warranty claims should be processed efficiently and effectively.
4. **Maintenance Support**: Provide clear instructions for ongoing maintenance and support. Installers and suppliers should be available for any necessary follow-up services.
5. **Feedback Collection**: Gather customer feedback to continually improve our services. Installers and suppliers should encourage customers to share their experiences and suggestions.

Refund policy Here is a detailed refund **example only policy** for a VEEC activity installation company (Victorian Energy Efficiency Certificate) trading company:

- Cancellations received more than 10 business days before the VEEC delivery date: 90% refund of the VEEC purchase price.
- Cancellations received between 5-9 business days before the VEEC delivery date: 70% refund of the VEEC purchase price.
- Cancellations received less than 3 business days before the VEEC delivery date: No refund.
- If installation has not occurred deposits will be returned for cancellations.



Greenbank is committed to providing comprehensive support for all inquiries post-sales, including addressing consumer concerns related to maintenance and servicing following installations. As a scheme participant, we will ensure that you are promptly notified of any relevant inquiries, and we will collaborate closely with the relevant authorities to successfully deliver on our commitments. You can find all the legal framework within the Warranties and refunds guide this will be on our website.

Dispute resolution

This framework must cover consumer complaints concerning the conduct of the accredited person and scheme participants as they:

- carry out any regulated action
- schedule a prescribed activity
- create a certificate for the prescribed activity.
- an accessible internal dispute resolution process to deal with consumer complaints or complaints brought on behalf of consumers.

Handling of complaints

Accredited persons must ensure that consumer complaints dealt with under their internal dispute resolution framework are handled in a timely and fair manner, including by:

- acknowledging all complaints within **5** business days of receiving them
- taking all reasonable steps to complete the internal dispute resolution process within **20** business days of receiving them.

Consequence of not complying with the code

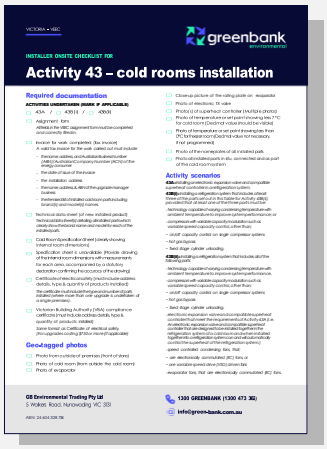
The commission takes non-compliance with the code very seriously and will actively investigate complaints associated with non-compliance. Regulation 15(2) of the VEET Regulations provides that a certificate cannot be created in relation to a prescribed activity if this code has not been complied with (in relation to that prescribed activity). An accredited person must not create certificates where any associated activity was not compliant with the code. The commission can also take compliance and enforcement actions, including prosecution of offences, where non-compliance is identified. These will be undertaken in a manner consistent with the commission's Compliance and Enforcement Policy.

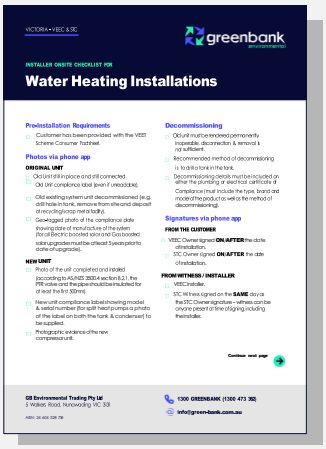
Training resources – check lists

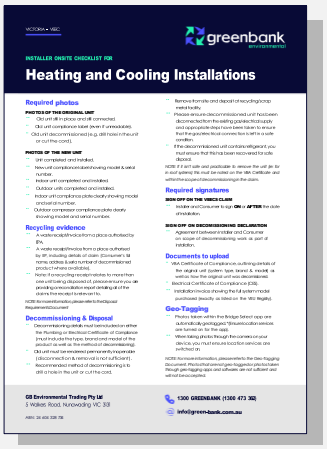
- GBET - Installer VEU code of conduct - checklist - contracting with consumers
- GBET - Installer VEU code of conduct - checklist – undertaking upgrades.
- VEU Code of conduct know your obligations installer fact sheet.
- VEU code of conduct – Statement of rights
- Victorian-Energy-Efficiency-Target-scheme-consumer-factsheet
- Activity 6/35/34 Videos within your onboarding email

Our team of auditors conducts regular audits to check the marketing activities of representatives and ensure compliance with the code of conduct. The audit and compliance process includes several components:

1. **Desktop Audit**: Conducted with the installer to ensure all required photographic evidence has been taken (applies to all installations).
2. **Verification Call**: Conducted with the customer to ascertain their level of satisfaction (applies to all installations).
3. **Field Audit**: Site visit to validate the products installed and assess customer satisfaction (conducted on a risk-based sample basis).


INSTALLER ONSITE CHECKLIST FOR
Activity 43 – cold rooms installation
Required documentation
Activity scenarios
Geo-tagged photos


INSTALLER ONSITE CHECKLIST FOR
Water Heating Installations
Pre-Installation Requirements
Photos via phone app
Decommissioning
Signatures via phone app


INSTALLER ONSITE CHECKLIST FOR
Heating and Cooling Installations
Required photos
Recycling evidence
Decommissioning & Disposal
Required signatures
Documents to upload
Geo-Tagging

Occupational Health & Safety – see handbook.

By law and reduce employee injuries / incidents, and damage to equipment and property to the lowest possible level scheme participates must have OH&S policies in place to:

- Provide a safe workplace.
- Report & record all serious accidents.
- Ensure employees are properly trained in safety regulations.
- Take actions as required to improve unsafe acts and conditions.
- Ensure proper first aid treatment and facilities are provided.
- Ensure proper personal protection equipment and procedures are followed by all company personnel as required.
- Comply with all legal requirements and safety procedures.

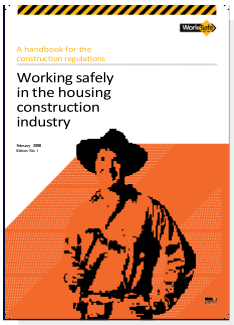
The principal contractor (site supervisor) is required to display a sign prominently before construction work begins. This sign must include:

- the principal contractor's name
- contact phone number.
- If there is a site project office, its phone number should also be displayed.

Risk Management

- Effective risk management involves:
- Identifying potential hazards in the workplace.
- Assessing the risks associated with these hazards.
- Implementing appropriate measures to control these risks.
- Regularly reviewing and updating risk controls.

Safe Work Method Statement for High-Risk Construction Work:



For high-risk construction work, employers must ensure that a Safe Work Method Statement (SWMS) is prepared. Refer to the Safe Work Method Statement Guidelines documentation for more information

This involves several steps:

- **Developing the SWMS**
  Before starting high-risk construction work, develop an SWMS using relevant guidelines.
- **Identifying Additional Hazards and Risks**
  Just prior to starting the work, identify any additional hazards and risks at the worksite.
- **Amending the SWMS**
  Amend the SWMS if necessary based on the identified hazards and risks.
- **Starting the Work**
  Begin the high-risk construction work only after the above steps are completed.
- **Responding to Changes**
  If changes occur during the work, stop the high-risk construction work and return to the second step to reassess and amend the SWMS as necessary

Australian Consumer Law

The Australian Consumer Law was introduced in 2011 as part of the Competition and Consumer Act 2010. Solution Providers and all representatives must be aware of their responsibilities to act in accordance with the Australian Consumer Law (ACL) at all times when selling and installing energy efficient equipment.

Under the ACL, organisations and any person acting on behalf of an organisation are prohibited from:

- Engaging in misleading or deceptive conduct, unconscionable conduct and enforcing unfair contract terms into their dealings with consumers,
- Denying a consumer their right to a repair, replacement or refund of a faulty product, or compensation for damages and loss or being able to cancel a faulty service.

The ACL also provides:

- Protections from unfair practices.
- A framework for unsolicited selling practices, such as telemarketing and door-to-door sales, and
- A requirement that all products and services supplied to consumers are safe and come with sufficient warranties to ensure the correct operation during their stated lifetime.

Speak with one of our account managers if you require any assistance (03) 9845 3000 www.green-bank.com.au. Greenbank undertakes a continuous review of relevant legislation, regulations & guidelines to update its training materials and processes to ensure it is compliant.

Environmental Protection Compliance:

All steps of the decommissioning process are executed to comply with the Environment Protection Act 2017. This involves the careful handling and segregation of any hazardous materials or substances, ensuring they are dealt with in an environmentally sound manner.

Refrigerant Recovery (for existing heat pump hot water systems):

- Technicians, certified in refrigerant handling, ensure that the recovery process prevents any release of refrigerant into the atmosphere, consistent with environmental protection regulations.
- Following disconnection, refrigerants are carefully recovered using EPA-approved refrigerant recovery machines. **Post refrigerant recovery,** heat pumps, or cold room fans are then disabled, ensuring they cannot be inadvertently powered on or used again.
- Removal of the units is conducted in a manner that minimizes any potential environmental impact.

Required installer training and qualifications upgrades must comply with legal requirements and be undertaken by personnel holding the following licenses:

- An RAC01 refrigerant handling licence (where handling of refrigerants is required)
- An electrician licence registered with Energy Safe Victoria (where wiring work is undertaken)
- A plumber licence registered with the Victorian Building Authority (where plumbing work is undertaken).

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Recycling:

Decommissioned units are transported to an EPA-licensed recycling facility. All transport is carried out by licensed carriers, and the movement of waste is documented as per EPA regulations.

Recycling is undertaken at facilities capable of processing and repurposing materials under the VEU Program's provisions, thereby reducing environmental impact.

Certificates of destruction or recycling for refrigerants are obtained and kept on file for compliance verification.

Fact Sheets can be found here:

www.arctick.org/information/fact-sheets

SIGNED:

COMPANY:

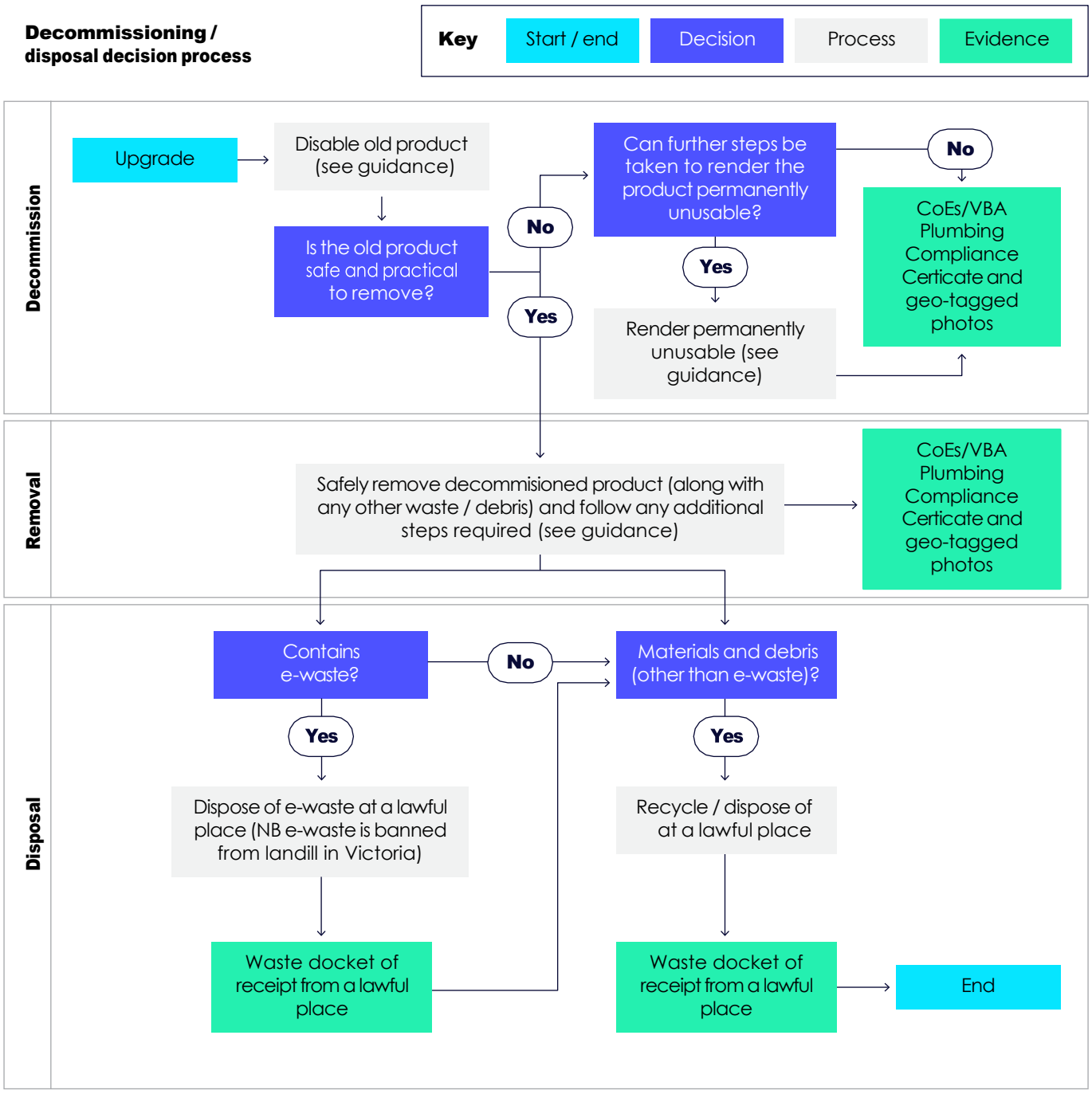
PRINT NAME:

DATE OF BIRTH:

(mandatory not today's date)

DATE SIGNED: _____

Decommissioning / disposal decision process



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