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Complaints Handling Procedure

Yanco BESS

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1. Introduction

1.1. Purpose of this document

This Complaints Handling Procedure (the Procedure) for the Yanco BESS Project (the Project) establishes a clear, transparent and consistent process for receiving, assessing and resolving feedback, concerns, complaints, grievances and disputes raised by stakeholders. Its purpose is to ensure that all complaints and grievances are managed in a timely, fair, and respectful manner, supporting positive relationships with communities, landholders, and other project stakeholders.

In this document, the term ‘complaint’ is used to refer broadly to all feedback, concerns, grievances and disputes raised by stakeholders.

1.2. Guiding Principles

This Procedure is underpinned by the following guiding principles:

Accessibility

Raising complaints is easily accessible, free of charge, and available through multiple channels. Reasonable adjustments can be made to support vulnerable or disadvantaged stakeholders.

Transparency

The process, timeframes, and outcomes to raise a complaint will be clearly communicated, and complainants will be kept informed throughout the process.

Fairness and Procedural Equity

Complaints will be assessed objectively and consistently, without bias or discrimination, and with respect for all parties involved.

Confidentiality and Privacy

Personal information will be handled sensitively and in accordance with applicable privacy requirements. Complaints raised anonymously will be accepted and assessed.

No Retaliation

Complainants will not be subject to retaliation, reprisal, or disadvantage for doing so.

Timeliness

Complaints will be acknowledged, assessed, and responded to within defined timeframes appropriate to the nature and risk of the issue.

Continuous Improvement

Complaint trends and outcomes will be monitored to inform improvements to project management, engagement practices, and mitigation measures.

1.3. Scope

Clear scope helps ensure complaints are handled in a fair, consistent, and proportionate way. It also supports shared understanding about who can make a complaint, and what types of issues can be managed through this Procedure.

1.3.1. Applicability

This Procedure applies to complaints associated with the planning, construction, operation, and decommissioning of the Project raised by, or relating to, including but not limited to the following parties:

- Local community members and residents
- Adjacent and near neighbours and landholders
- Local community members and residents
- Traditional Owners and First Nations stakeholders
- Local businesses, service providers, and community organisations
- Local, State and Federal Government representatives, departments and agencies
- The Project workforce and contractors, where complaints relate to community, stakeholder, or external impacts of the Project.

1.3.2. Complaints covered

Under this Procedure, a complaint is any expression of dissatisfaction as a result of real or perceived adverse impact arising from the Project's activities, behaviours, or interactions that require assessment and response by the Project team.

Complaints may relate to, but are not limited to:

- Construction or operational impacts such as noise, dust, traffic, access, or visual amenity
- Land access arrangements or property-related impacts
- Environmental matters, especially where there is a direct social or community impact
- Community health, safety, or wellbeing concerns

- The conduct or behaviour of Project personnel, workers, or contractors in the community
- The adequacy or effectiveness of communication, consultation or engagement activities
- Complaints regarding compliance with commitments made to stakeholders or the community.

1.3.3. Matters excluded

The following matters are not considered under this Procedure and are managed through separate, relevant processes:

- General questions or request for information
- Feedback or suggestions that do not involve dissatisfaction or perceived harm
- Internal employment or industrial relation matters that do not relate to external or community impacts
- Commercial or contractual disputes governed by separate agreements
- Matters that are subject to formal legal proceedings or regulatory enforcement action, where the Project is required to defer to statutory or judicial processes.

Where an issue falls outside the scope of this Procedure, the Project team will explain the reasons and, where practicable, advise on an appropriate alternative pathway.

1.4. Definitions

The following definitions apply:

Complaint	An expression of dissatisfaction made by a person or organisation in relation to the Project, its activities, or the conduct of Project personnel or contractors, where a response or resolution is expected
Complainant	An individual, group, or organisation that raises a complaint in relation to the Project
Dispute	A complaint that has not been resolved through the standard complaints handling process and requires escalation, facilitated discussion, mediation, or external resolution mechanisms
Enquiry	A request for information or clarification about the Project that does not express dissatisfaction or allege harm or impact
Escalation	The process by which a complaint is referred to a higher level of management or an alternative resolution pathway when it cannot be resolved at the initial stage or where the complainant is dissatisfied with the outcome
Grievance	A formal complaint, or claim raised by a community member, landholder, stakeholder, or other affected party regarding actual or perceived impacts of the Project, including its activities, behaviour of personnel, or management of impacts

Investigation	A structured and proportionate process undertaken to understand the nature, cause, and potential impacts of a complaint and to inform appropriate response and resolution actions
Monitoring and Evaluation	The systematic review of complaint data and processes to assess effectiveness, identify trends or systemic issues, and support continuous improvement of Project practices
Resolution	An outcome agreed between the Project and the complainant that addresses the complaint in a fair, reasonable, and proportionate manner
Stakeholder	Any individual, group, or organisation with an interest in, or potentially affected by, the Project, including community members, landholders, local businesses, government agencies, and service providers
Stakeholder Relationship Management System	The Project's centralised database used to record, track, and manage stakeholder interactions, including complaints.
Unreasonable Complainant Conduct	Behaviour by a complainant that, due to its nature or frequency, raises health, safety, or resource concerns and may require a managed response, without limiting the complainant's right to have their complaint considered

2. Governance and Accountability

2.1. Roles and Responsibilities

Effective complaints handling relies on clear governance, defined responsibilities, and consistent oversight. This Procedure establishes how accountability is maintained across the Project and ensures complaints are handled in a fair, transparent, and timely manner.

Clear roles and responsibilities support both proactive and reactive management of issues. Key members of the Project team are involved in identifying, acknowledging, managing, and responding to complaints, as well as potential impacts and opportunities associated with the Project.

Table 1 provides an overview of key Project roles and responsibilities across different phases of the Project.

Table 1 Role and responsibilities

<i>Role</i>	<i>Responsibilities</i>
Project Manager	<ul style="list-style-type: none"> • Implements the Procedure in day-to-day Project delivery. • Coordinates investigation and resolution actions across the Project team and contractors, including design, construction, and community relations. • Ensures contractors comply with complaints management requirements. • Assists with audits, inspections, and investigations.

	<ul style="list-style-type: none"> Escalates complaints where resolution cannot be achieved at the Project level Ensures compliance with contractual obligations, safety and environmental regulations.
Community Engagement Lead	Outlined in Section 2.2
Site Manager	<ul style="list-style-type: none"> Supervises on-site construction activities to ensure compliance with design specifications, safety regulations and environmental guidelines, coordinating with contractors, suppliers, and other technical teams to conduct quality control checks and ensure construction meets required standards. Provides timely technical advice and input on complaints relating to construction activities, site operations, traffic, access, and engineering-related matters. Supports investigation and resolution of site-based complaints in collaboration with the Project team and the Community Engagement Lead. Assists in identifying corrective actions or changes to site practices to address substantiated complaints. Supports the accurate recording of complaints and verifies that mitigation measures have been implemented.
Safety and/or WHS Representative	<ul style="list-style-type: none"> Provides subject matter expertise on health and safety matters raised through the complaints mechanism. Supports investigation of complaints relating to actual or perceived safety risks to workers or the community. Advises on mitigation measures and corrective actions to address safety-related complaints, in accordance with applicable safety obligations.
Contractors and Subcontractors	<ul style="list-style-type: none"> Comply with the requirements of this Procedure. Promptly notify the Project team of complaints received directly. Cooperate with investigations and resolution actions. Address behaviours or activities within their control that give rise to complaints.
Project Team	<ul style="list-style-type: none"> Support the implementation of this Procedure within their respective areas of responsibility. Assist with investigation and resolution of complaints relevant to their discipline or role. Provide timely and accurate information to support complaints assessment, investigation, and resolution. Identify potential risks or emerging issues that may give rise to complaints and escalate internally where appropriate. Support continuous improvement by incorporating lessons learned into Project practices.
Senior Management	<ul style="list-style-type: none"> Senior Management refers to personnel with overall accountability and decision-making authority for the Project, including roles such as the Head of Development, Asset Manager, and Construction or Operations Manager, or equivalent. Provides oversight of complaints trends and systemic issues.

	<ul style="list-style-type: none"> • Supports escalation and dispute resolution where complaints cannot be resolved at the Project level. • Endorses corrective actions or changes to project practices where required.
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2.2. Community Engagement Lead

The Community Engagement Lead acts as the primary point of contact for community members and stakeholders, providing a consistent and approachable interface while leading complaints handling and ensuring timely, fair, and respectful complaints handling.

Key responsibilities of the Community Engagement Lead include:

- Acting as the first point of contact for complaints raised by community members and stakeholders.
- Acknowledging receipt of complaints and explaining the complaints handling procedure, including expected timeframes.
- Coordinating assessment, investigation, and response actions with relevant Project personnel or contractors.
- Maintaining accurate, secure, and confidential records
- Keeping complainants informed of progress and outcomes
- Identifying recurring issues or emerging trends and escalating these where appropriate
- Supporting respectful, culturally appropriate, and inclusive engagement, including with First Nations stakeholders.

Where appropriate, the Community Engagement Lead may facilitate informal discussions or early resolution approaches to address issues before they escalate into disputes, while recognising the limits of the complaints handling process.

2.3. Unreasonable Complainant Conduct

The NSW Ombudsman provides guidelines which define unreasonable complaint conduct as:

“...any behaviour by a current or former complainant which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the parties to a complaint.”

While it’s not expected that the project will attract complainants who engage in this type of behaviour, if a situation arises where a complainant’s conduct may negatively affect the health, safety, resourcing, or fairness of service for the Community Engagement Lead, Project team, or related staff, the Project will follow the procedures and guidance set out in the NSW Ombudsman’s *Managing Unreasonable Complainant Conduct Practice Manual (2nd Edition)*.

3. Access and Lodgement Channels

Accessible and transparent communication channels are central to effective complaints handling. The Project will provide multiple, clearly communicated pathways for community members and stakeholders to make complaints throughout all phases of the Project.

Information on how to contact the Project will be made available through a range of platforms and updated as required. All matters received by, or escalated to, the Project team and Community Engagement Lead will be recorded and handled through the Project’s Stakeholder Relationship Management System (see Section 4).

3.1. Project-Specific Contact Point

Project-specific contact details will be provided on all Project communications and collateral, including the Project website, community notifications, correspondence, and site signage.

Complaints may be received directly through the Project contact points or indirectly via other channels (for example, referrals from government agencies or community representatives).

The contact details outlined below are current at the time of writing this Procedure (May 2026) and may be updated periodically throughout the life of the Project to reflect in Project personnel or responsibilities.

Contact	Claire Baertels, Community Engagement Manager – ACENERGY
Email	info@yancobess.com.au
Phone	1800 845 190

3.2. Project Website

Project information will be made available online through a dedicated Project webpage or other nominated online communication platform. Any changes to website details or primary points of contact will be communicated to stakeholders and the community through appropriate communication channels.

The Project website will remain accessible for the duration of the Project lifecycle, including construction, operation, and decommissioning, where applicable.

The website will be updated regularly and will include, at a minimum:

- Details of relevant statutory approvals for the Project
- A summary of the current stage and progress of the Project
- Contact details for making enquiries or making complaints
- This Procedure
- Information on upcoming works or activities where relevant to the community.



3.3. Project Email

A dedicated Project email address at info@yancobess.com.au is established to receive complaints related to the Project.

Emails will be monitored regularly by the Community Engagement Lead. All matters received via email will be acknowledged and managed in accordance with this Procedure and recorded in the Stakeholder Relationship Management System.

3.4. Dedicated Phone Number

A project phone number (1800 845 190) will continue to be provided through all Project communications and collateral. Calls received during standard working hours and any approved out-of-hours work periods will be managed by the Community Engagement Lead. Calls received outside of these times will be recorded via voicemail for action the next business day.

The Community Engagement Lead will record, track, and handle complaints in the Project's Stakeholder Relationship Management System.

3.5. Interactions and Face to Face

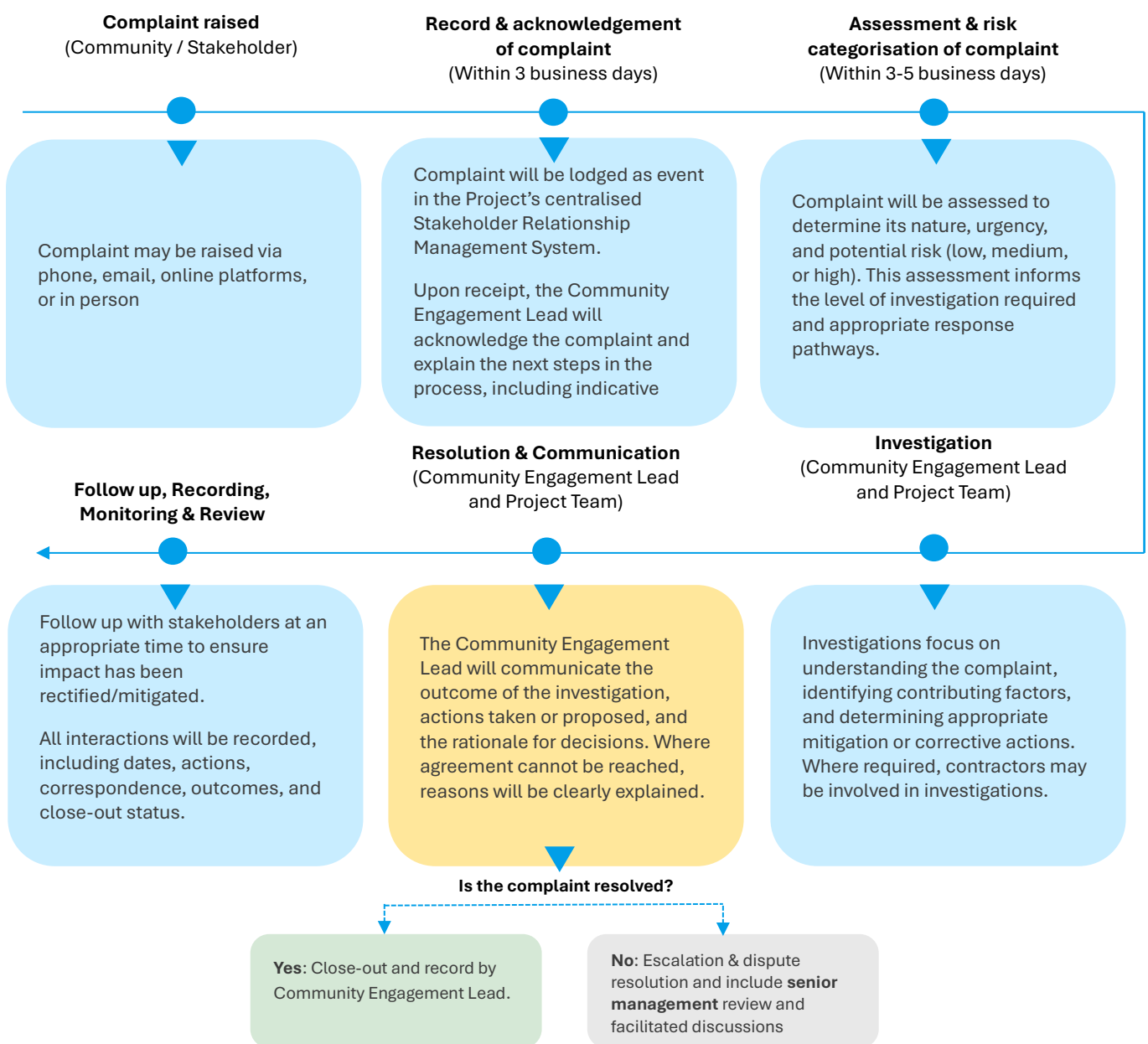
Community members and stakeholders may make complaints in person during site visits, community meetings, or other engagement activities.

Any matters raised in person will be documented by the Project team and referred to the Community Engagement Lead for recording, follow-up, and response in accordance with this Procedure.

4. Complaints Handling

Complaints may be raised by stakeholders throughout the Project lifecycle. As multiple developments and construction activities may be occurring in the surrounding area, some complaints may relate to impacts associated with other works. Effective management of community expectations relies on the timely provision of accurate project information, clear identification of the source and nature of complaints, and the application of appropriate mitigation measures where required. Some complaints may be one-off in nature, while others may involve ongoing correspondence or multiple issues raised by the same stakeholder.

Figure 1 Overview of the Complaints Handling Procedure



4.1. Lodgement and Acknowledgement

Complaints may be raised at any stage of the Project lifecycle and through multiple accessible channels outlined in Section 3. Complaints may be submitted anonymously, noting that this may limit the Project team’s ability to provide feedback or resolution. All complaints will be acknowledged within 3 business days, and where they cannot be resolved immediately, the complainant will be informed of the next steps and anticipated timeframes.

4.1.1. Receipt and Registration of Complaint

To support fair and timely resolution, sufficient information is required to understand the nature of the complaint and the impact being experienced. Relevant details will be collected and recorded at the time the complaint is first raised, to the extent applicable.

The Community Engagement Lead will record complaints and relevant information in the Stakeholder Relationship Management System and may include the details outlined in Table 2 below. All information will be handled in accordance with privacy and confidentiality obligations.

Table 2 Initial information required

<i>Information collected and recorded on receipt of the complaint</i>
Name of complainant, if provided
Complainant’s contact information (phone number and email)
Complainant’s address
Time and date of the complaint
Time and date of the incident the subject of the complaint
Prevailing conditions (operations conditions at the time of the incident)
Type of complaint (e.g. noise, visual, health, traffic)
Description of the complaint
Frequency of the issue
Outcome sought by complainant
Any support requirements needed by the complainant
Any other relevant information (Including any supporting documents provided by the complainant)
Name of the person who recorded the complaint

4.2. Assessment and Risk Categorisation

All complaints will be assessed on receipt to determine:

- The level of potential risk or impact
- The urgency of response
- The appropriate management pathway

Factors considered will include severity, frequency, vulnerability of affected stakeholders, potential regulatory implications and reputation risk. Where appropriate, risk categorisation may be reviewed and updated as new information becomes available.

Table 3 Assessment criteria for risk categorisation

<i>Priorities and potential risk</i>	<i>Timeframe</i>	<i>Description</i>	<i>Example</i>
Enquiry	Respond within 3 business days. Resolve within 10 business days.	General enquiry related to the Project.	A resident calls to ask when construction traffic will be using road.
Low	Respond within 3 business days. Resolve within 7 business days.	Low level complaint, no other severity criteria met.	A stakeholder raises complaint about not receiving a recent construction notification.
Medium	Respond within 2 business days. Resolve within 5 business days.	Threat to escalate to a third party, e.g. local council, legal representative, elected representative, government department.	A neighbour advises they intend to contact their local council regarding construction noise outside expected hours.
High	Respond within 1 business days. Resolve within 3 business days.	Threat to escalate to a third party, public social media post or other media outlet, allegation of misuse, code of conduct breach or legislation.	Allegation that a contractor vehicle was driving unsafely near a school bus stop, or a social media post alleging non-compliance with approval conditions.

4.3. Investigation

Where a complaint cannot be resolved immediately and an investigation is required, Community Engagement Lead will be responsible for leading the investigation process that is proportionate to the nature and risk of the complaint. The investigation may include:

- Review of relevant Project records, procedures and approvals
- Consultation with internal teams or contactors
- Site inspections (where relevant)
- Engagement with the complainant to clarify impacts and expectations.

Investigations will be conducted impartially and respectfully, with a focus on understanding both the technical cause and the human experience of the issues. Findings will be documented, and recommended actions identified to address the complaint and prevent recurrence.

4.4. Resolution and Communication

Resolution aims to address the complaint in a way that is fair and reasonable, and culturally appropriate, while being consistent with the Project commitment and regulatory requirements.

Potential resolution measures may include:

- Corrective actions or changes to Project practices
- Mitigation measures

- Provision of information or clarification
- Referral to an alternative appropriate process.

The Community Engagement Lead will inform the complainant of:

- The outcome of the investigation
- Action taken or proposed
- Expected timeframes for implementation

Communication will be clear, respectful and documented. Where the complainant does not agree with the proposed resolution, this will be recorded and progressed through escalation pathways.

4.5. Escalation and Dispute Resolution

If a complaint cannot be resolved through the standard handling procedure, or where the complainant is dissatisfied with the outcome, the complaint may be escalated to relevant personnel for further review.

Escalated complaints may require additional time to assess and resolve, particularly where site inspections are required, property damage is alleged, external specialist advice is needed, or ongoing monitoring data must be reviewed.

Escalation and dispute resolution options may include:

- Facilitated discussions or mediation
- Referral to an external consultant, relevant authority, or independent dispute resolution body, where appropriate.

Throughout the escalation process, the Community Engagement Lead will keep the complainant informed of progress and expected timeframes. The Project will make reasonable efforts to resolve complaints collaboratively and in good faith before any external escalation occurs.

4.6. Follow up, Recording and Documentation

All complaints, investigations, actions, and outcomes will be recorded in the centralised Stakeholder Relationship Management System.

Follow-up will be undertaken at appropriate time to:

- Confirm that agreed actions have been implemented
- Ensure that the complaint has been effectively resolved
- Identify any recurring or systemic issues or trends.

Where the complainant accepts the proposed resolution, the Community Engagement Lead will close the complaint and update its status as *closed* in the Stakeholder Relationship Management System.

Data insights will be used to support continuous improvement of Project practices, inform ongoing community engagement and risk management, and meet reporting requirements to regulators or other relevant authorities, where required.

All records will be managed in accordance with applicable privacy legislation. Information will be stored securely, access will be limited to authorised personnel, and records will be retained in line with legislative and corporate retention requirements.

5. Monitoring, Report and Evaluation

Monitoring, reporting and evaluation will be undertaken to measure the effectiveness of the Project's complaints handling . Opportunities for improvement will be sought on a continuous basis, with an annual review of this Procedure undertaken to formalise these incremental improvements.

5.1. Monitoring

The performance of this Procedure will be monitored on a quarterly basis through review and analysis.

Monitoring will focus on identifying trends, systemic issues, and opportunities to improve Project communication, engagement, and mitigation measures. Monitoring indicators will include, but are not limited to:

- Total number of complaints raised during the reporting period
- Number of complaints relating to perceived lack of consultation, misinformation, or confusion
- Number of enquiries relating to information previously disseminated through Project communication channels
- Recurring complaints of a similar nature, indicating potential underlying systemic issues with Project activities or communication approaches
- Response and resolution timeframes, including time taken to acknowledge complaints, and time taken to provide a response or implement agreed actions.

5.2. Reporting

Outcomes of complaints monitoring will be reported internally at regular intervals to Project management to support informed decision-making and proactive risk management. Report may include:

- Summary of statistics on volume of complaints
- Key themes and trends
- Status of open and resolved complaints
- Any high-risk or escalated matters
- Actions undertaken or proposed to address identified issues.

5.3. Evaluation and Review

A formal management review of this Procedure will be undertaken at least once every 12 months, or more frequently if required due to changes in Project phase, risk profile, or regulatory expectations.

The Community Engagement Lead is responsible for initiating the annual review and coordinating input from:

- The Project Manager
- Relevant contractors and Project team

Evaluation will consider:

- Trends in frequency and severity of complaints over time
- Effectiveness of response and resolution timeframes
- Feedback from complainants where available
- Alignment with regulatory requirements and best practice guidance
- Adequacy of resourcing, roles, and procedures.

Outcomes of the evaluation will inform updates to this Procedure and engagement practices. Any material changes will be communicated internally and, where relevant, reflected in updated Project documentation.