Financial Hardship Policy
(Embedded Network Customers)

1. Purpose

Realm is committed to supporting residential customers in embedded networks who are experiencing financial difficulty. This Financial Hardship Policy outlines Realm's processes for identifying, assisting, and managing hardship customers in accordance with the AER Exempt Selling Guideline Version 7 and the National Energy Retail Rules (NERR).

This policy also recognises that Realm often acts as **agent for the embedded network owner**, requiring coordinated hardship handling to ensure protections are applied consistently and lawfully.

2. Scope

This policy applies to:
- All residential customers in embedded networks for whom Realm provides billing or customer support.
- All network types: electricity, hot water, thermal energy, and water billing.
- All staff, contractors, and agents acting on behalf of Realm.

A hardship customer is a residential customer who is willing but unable to meet payment obligations due to financial difficulty.

3. Regulatory Framework

This policy complies with:
- AER Exempt Selling Guideline v7 – Mandatory Hardship Obligations.
- National Energy Retail Rules (NERR) Part 3 – Hardship Provisions.
- Relevant privacy, billing, and consumer protection legislation.

Hardship protections apply regardless of exemption class (R1–R5).

4. Guiding Principles

Realm manages hardship support in accordance with the following principles:
- **Accessibility** – hardship support is simple to access and request.
- **Fairness** – all customers are treated with dignity and respect.
- **Transparency** – customers understand options and support available.
- **Flexibility** – payment solutions reflect individual capacity.
- **Protection** – customers on hardship plans will not be disconnected.
- **Confidentiality** – personal information is safeguarded.

5. Identifying Financial Hardship

Realm may identify hardship through:

- Direct disclosure by the customer.
- Missed or late payments.
- Requests for payment extensions.
- Changes in personal circumstances.
- Evidence of vulnerability or ongoing stress.

Realm will never require documentary proof to accept a customer into the hardship program.

6. Embedded Network Considerations

Because Realm often acts on behalf of the embedded network owner:

- Some hardship cases may require coordination with the owner.
- Realm will only share information with the owner when necessary and lawful.
- Realm will administer hardship protections even when the owner is the exempt seller.
- Customers will be informed who is responsible for parts of the process.

7. Support Available

Realm provides the following hardship assistance:

- **Flexible payment plans** based on customer capacity.
- **Payment extensions** where appropriate.
- **Waiver of late fees**.
- **Suspension of debt collection activity** during engagement.
- **No disconnection** of essential services while in the program.
- **Review of charges** to ensure billing accuracy.
- **Usage advice** where applicable.
- **Referrals to external financial counsellors**.

8. Payment Plans

Payment plans consider:

- Customer's ability to pay.
- Outstanding balance.
- Expected consumption.

Payment plans may include:

- Weekly, fortnightly, or monthly instalments.
- Temporary payment pauses.
- Partial bill smoothing.

Realm will provide a written payment plan summary, including instalment amounts and review dates.

9. Customer Responsibilities

To remain in the hardship program, customers are expected to:
- Make agreed payments when possible.
- Notify Realm if circumstances change.
- Work with Realm to maintain realistic payment arrangements.

Realm understands circumstances can change and will adjust plans when required.

10. Protection from Disconnection

Customers actively participating in the hardship program will not be disconnected.

Realm will not disconnect a customer without first:
- Attempting meaningful contact.
- Offering hardship support.
- Providing payment plan options.

This applies even when Realm is acting as agent for the network owner.

11. Privacy & Confidentiality

All hardship information is confidential and handled in accordance with Realm's Privacy Policy. Information is shared with the embedded network owner only where required for regulatory, operational, or safety obligations.

12. Exiting the Hardship Program

Customers may exit the program when:
- Their account is up to date.
- Their circumstances improve.
- They request to exit.

Realm may end a hardship plan if the customer fails to engage, but only after reasonable attempts at contact and support.

13. Staff Responsibilities & Training

Realm staff must:
- Complete annual hardship training.
- Understand obligations under Guideline v7.

- Treat customers respectfully and professionally.
- Maintain accurate documentation.
- Refer customers to specialist support when required.

14. Governance & Review

Realm will review this policy annually or sooner if regulations change.
Material breaches will be documented and, where required, reported to the AER.
Updates will be approved by Realm's Managing Director.

15. Version Control

Version: 1.0
Approved by: David Reid, Director
Effective Date: November 2025
Next Review: November 2026