

**Application for interim and final  
authorisation under s88(1) of the  
*Competition and Consumer Act 2010 (Cth)***

Lodged by:

**The Australian Banking Association**

on behalf of itself and others


**Confidential**

27 March 2024

**RESTRICTION OF PUBLICATION OF PART CLAIMED**

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**Contents**

<b>1</b>	<b>Executive Summary</b>	<b>3</b>
<b>2</b>	<b>Background</b>	<b>5</b>
<b>3</b>	<b>Parties to the Proposed Conduct</b>	<b>6</b>
	3.1 Applicant	6
	3.2 Email address for service of documents in Australia	7
	3.3 Other persons who propose to engage in the Proposed Conduct	7
<b>4</b>	<b>Proposed Conduct</b>	<b>7</b>
	4.2 Application for interim authorisation	8
	4.3 Provisions of the CCA which might apply to the Proposed Conduct	9
	4.4 Term of authorisation sought	9
<b>5</b>	<b>Persons who may be directly impacted by the Proposed Conduct</b>	<b>9</b>
<b>6</b>	<b>Counterfactual</b>	<b>10</b>
<b>7</b>	<b>Public benefit</b>	<b>10</b>
<b>8</b>	<b>Public detriment</b>	<b>11</b>
<b>9</b>	<b>Declaration by applicant</b>	<b>11</b>
	Annexure A	13
	Annexure B	16
		18

**RESTRICTION OF PUBLICATION OF PART CLAIMED****1 Executive Summary**

This application is made to the ACCC by the Australian Banking Association (**ABA** or the **Applicant**), on behalf of itself, its members (**Member Banks**) and other stakeholders listed in section 3.3 below. It is related to the previous application made by the ABA on 30 November 2023 to facilitate urgent discussions between Member Banks, the Reserve Bank of Australia (**RBA**), Commonwealth Treasury, Armaguard and other relevant stakeholders in order to develop urgent responses to support the viability of wholesale cash<sup>1</sup> distribution and continued access to retail cash services in Australia (AA1000654) (the **First Authorisation Application**).

The First Authorisation Application was made following concerns raised by Linfox Armaguard Pty Ltd (**Armaguard**) in October 2023 that, notwithstanding the merger of Armaguard and Prosegur Australia Holdings Limited (**Prosegur**) in September 2023, the cash-in-transit (**CIT**) services industry in Australia was not sustainable in its current form and that Armaguard had insufficient self-generating funds to reinvest in the future sustainability of the wholesale cash distribution network on an ongoing basis. Since then, Armaguard has advised the ABA and its Member Banks that its financial position has continued to decline. [REDACTED]

[REDACTED] In addition, based on publicly available filings, the Applicant understands that Armaguard's parent company guarantee under a Deed of Cross Guarantee will expire on 2 April 2024 (**Parent Guarantee**).

On 6 December 2023, the ACCC granted interim authorisation in response to the First Authorisation Application (**First Interim Authorisation (AA1000654)**). The First Interim Authorisation (AA1000654) allows the ABA, Member Banks, Commonwealth Treasury, the RBA, Armaguard, Australia Post, and other businesses who distribute and use cash in their businesses (the **Authorised Parties**) to:

- engage in discussions and exchange information that is for the purposes of, and reasonably necessary for, developing and evaluating potential industry responses to: (i) the viability of wholesale cash distribution in Australia; and/or (ii) securing continued access by banks, retailers, other businesses and/or members of the public to retail cash services in one or more metropolitan and/or regional non-metropolitan locations; and
- reach in-principle agreement on the form and content of any urgent industry responses to be pursued, the implementation of which would be the subject of a separate application for ACCC authorisation, as required.

<sup>1</sup> A reference to 'cash' in this application encompasses both a reference to banknotes and coins, as relevant.

**RESTRICTION OF PUBLICATION OF PART CLAIMED**

Following the First Interim Authorisation (AA1000654), the RBA established an industry roundtable comprising the RBA, Commonwealth Treasury, the Applicant and Australia and New Zealand Banking Group, Commonwealth Bank of Australia, National Australia Bank and Westpac Banking Corporation (together, the **Major Banks**) to explore and evaluate urgent industry responses to the challenges facing Australia's cash services (this working group was previously known as the RBA Roundtable on Wholesale Banknote Distribution and is referred to in this application as the **RBA Cash Sustainability Working Group**). The RBA Cash Sustainability Working Group has been expanded to include the following Authorised Parties: Bendigo and Adelaide Bank, Australia Post, Coles, Woolworths and Wesfarmers. The RBA Cash Sustainability Working Group oversees three workstreams (i) short term initiatives (e.g. initiatives that could be implemented immediately and over the next 12 months) to respond to acute issues within the cash distribution system (supported by an external forensic accountant engaged by the RBA and work done by the banks' workout teams (the **ABA Cash Work Out Group**)); (ii) business continuity planning through an RBA chaired Business Continuity Working Group (**RBA BCP Working Group**) and supported by banks' and other Authorised Parties' BCP teams; and (iii) longer term initiatives to ensure the ongoing sustainability of the wholesale cash distribution network and access to retail cash services in Australia. Measures considered in workstream (ii) are the subject of this application.

The First Interim Authorisation (AA1000654) has allowed the Applicant, its Member Banks and certain Authorised Parties to exchange information and to discuss potential industry responses to the viability of wholesale cash distribution in Australia and securing continued access to cash. However, the First Interim Authorisation (AA1000654) (and any final authorisation granted under the First Authorisation Application) only permit the Authorised Parties to reach in-principle agreement on any industry responses or solutions that result from these discussions. The implementation of those solutions requires a separate ACCC authorisation.

[Redacted text block]

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Under the First Interim Authorisation (AA1000654), in addition to exploring short term initiatives to support the ongoing viability of wholesale cash distribution, the RBA BCP Working Group is

## RESTRICTION OF PUBLICATION OF PART CLAIMED

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developing Business Continuity Planning to be followed in the event of (or in reasonable anticipation of) a suspension, disruption, exit or partial exit of Armaguard to support the continued and safe distribution and availability of cash to businesses and consumers in metropolitan and regional locations in such a scenario (**Business Continuity Planning**) and to support customers and businesses who use cash in the event of any disruption to CIT services. The BCP Working Group is chaired by the RBA and includes the RBA, Commonwealth Treasury, the Applicant, the Major Banks, Australian Payments Network and more recently, Bendigo and Adelaide Bank Australia Post, Wesfarmers, Woolworths and Coles.

This application is made accordingly to facilitate the implementation of Business Continuity Planning. Without ACCC authorisation, the Authorised Parties will be unable to implement Business Continuity Planning. The ABA, Member Banks and other Proposed Authorised Parties consider that the further development and implementation of Business Continuity Planning by the RBA BCP Working Group and/or the RBA Cash Sustainability Working Group (and members of those working groups) is vital to minimising the impacts of any disruption to CIT services and ensuring as much as possible ongoing access to wholesale cash distribution and retail cash services if, notwithstanding the exploration of short term initiatives to respond to acute issues within the cash distribution system, there is any suspension disruption or exit of Armaguard's CIT services.

The Applicant seeks final authorisation under section 88(1) of the *Competition and Consumer Act 2010* (Cth) (**CCA**) to engage in the conduct described in section 4 of this application.

In addition, given the urgency of the above initiative, the Applicant also requests interim authorisation prior to Friday 29 March 2024.

The Proposed Conduct (as defined in section 4 below) is limited to discussions, agreements or implementation of Business Continuity Planning which has occurred at, in preparation for, or arises out of meetings or communications of the RBA Cash Sustainability Working Group and the RBA BCP Working Group, both of which are facilitated and chaired by the RBA (together, the **Working Groups**). In addition, the Applicant proposes that an external competition lawyer attend each meeting of these Working Groups and that monthly reports be submitted to the ACCC regarding progress in developing and implementing Business Continuity Planning. In circumstances where the RBA facilitates and participates in both Working Groups and there is a high degree of transparency through regular reporting to the ACCC, the Applicant submits that the potential for public detriment is very limited, and that any theoretical public detriment is outweighed by the substantial public benefits of facilitating the implementation of Business Continuity Planning in the event of any suspension, disruption or exit of Armaguard's CIT business.

## 2 Background

The First Authorisation Application detailed the structural decline of the CIT industry over many years as a result of the decreasing use of cash as a payment method. This decline has resulted in significant financial pressure on private participants due to the underutilisation of distribution infrastructure and the materially increased unit costs of transporting and distributing cash.

At the end of October 2023, the RBA initiated an industry roundtable meeting in order to discuss the ongoing viability of wholesale banknote distribution in Australia. Attending the roundtable were Armaguard, the RBA, the ABA, the Major Banks and Commonwealth Treasury. Armaguard expressed the view that notwithstanding its merger with Prosegur, the industry is unsustainable in its current form and that in order to meet the Federal Government's policy position regarding Australians having continued access to cash, that the industry needed to work together to develop a

**RESTRICTION OF PUBLICATION OF PART CLAIMED**

sustainable solution. Armaguard also advised that it had insufficient self-generating funds to reinvest in the future sustainability of the wholesale cash distribution network on an ongoing basis.

Based on these developments and because Armaguard is the primary distributor of wholesale cash, there was a serious concern that any suspension or disruption in the supply of CIT services could reduce the availability of cash to the Major Banks at a wholesale distribution level, and other participants in the retail cash distribution chain such as other commercial banks, Australia Post, major retailers and ATM services providers. This in turn could reduce the availability of cash to consumers and businesses across Australia.

Following the First Interim Authorisation (AA1000654), the RBA established the RBA Cash Sustainability Working Group (previously known as the RBA Roundtable on Wholesale Banknote Distribution) which has worked intensively over the last fifteen weeks on a coordinated response to the issues facing the cash distribution system. The RBA Cash Sustainability Working Group convened three workstreams as part of these activities:

(i) **short term initiatives to respond to acute issues within the cash distribution system.** This workstream is overseen by the RBA Cash Sustainability Working Group and has been supported by the work of an external forensic accountant engaged by the RBA and the assistance of the ABA Cash Work Out Group who have explored and developed specific forms of short term assistance to Armaguard;

(ii) **business continuity planning (specifically in relation to the continued provision of CIT services given representations made by Armaguard about their financial position).** This workstream is overseen by the RBA BCP Working Group and is supported by the banks' and other Authorised Parties' BCP teams; and

(iii) **longer term initiatives to ensure the ongoing sustainability of the wholesale cash distribution network and access to retail cash services in Australia.**

This Application is made to facilitate the further development and implementation of Business Continuity Planning as part of workstream (ii) above pursuant to the First Interim Authorisation (AA1000654).

### 3 Parties to the Proposed Conduct

#### 3.1 Applicant

The ABA is an incorporated association under the provisions of the NSW Associations Incorporation Act 1984. There are 20 Member Banks. The ABA is governed by a Council which comprises the Chief Executive Officers of Member Banks. There are currently 15 members of the ABA Council.

The ABA works with its members to provide analysis, advice and advocacy and contributes to the development of public policy on banking and other financial services. The ABA works with government, regulators and other stakeholders to ensure Australia's banking customers continue to benefit from a prudentially stable, competitive and accessible banking industry.

Name, address (registered office), telephone number and ACN	Contact person's name, position, telephone number and email address	Description of business activities
The Australian Banking Association (ACN 117 262 978)	[REDACTED]	The ABA provides analysis, advice and advocacy for the banking industry and contributes to the

**RESTRICTION OF PUBLICATION OF PART CLAIMED**

Level 18, 6 O'Connell Street, Sydney 2000 (02) 8298 0417	[REDACTED]	development of public policy on banking and other financial services.
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**3.2 Email address for service of documents in Australia**

Rosannah Healy  
Partner, Allens  
[Rosannah.Healy@allens.com.au](mailto:Rosannah.Healy@allens.com.au)  
(03) 9613 8421

**3.3 Other persons who propose to engage in the Proposed Conduct**

The following parties (and their subsidiaries as relevant) may be involved in one or more aspects of the Proposed Conduct:

- the Member Banks listed in Annexure A, including the Major Banks;
- Armaguard;
- Commonwealth Treasury;
- the RBA;
- the Royal Australian Mint;
- Australia Post;
- suppliers of cash-in-transit services;
- non-Member Banks;
- Australian Payments Network; and
- retailers, supermarkets and other businesses who distribute and utilise cash in their businesses,

(collectively with the Applicant, the **Proposed Authorised Parties**).

**4 Proposed Conduct**

The RBA Cash Sustainability Working Group and RBA BCP Working Group consider it critical that the Proposed Authorised Parties be permitted to implement Business Continuity Planning in the event of (or in reasonable anticipation of) a suspension, disruption or exit of Armaguard's CIT services.<sup>2</sup> In particular:

- two or more of the Applicant, the Major Banks, other Member Banks and/or other Proposed Authorised Parties propose to discuss, share information, reach agreement on and/or implement (as required) business continuity planning to be followed in the event of, or in reasonable anticipation of, a suspension, disruption or exit of Armaguard's CIT services to (i) support the continued and safe distribution and availability of cash to banks, retailers, other businesses and/or members of the public in metropolitan and regional non-metropolitan locations in the short-term and prior to the development of a longer term regulatory or industry solution and/or (ii) to support customers and businesses who use cash in the event of any such suspension, disruption or exit (**Business Continuity Planning**);
- discussions, contracts, arrangements, understandings or implementation regarding Business Continuity Planning must occur at, in preparation for, or arise out of, a meeting, meetings or

<sup>2</sup> A reference to Armaguard's CIT services encompasses CIT services provided by subsidiaries of Armaguard including Prosegur Australia Pty Ltd.

**RESTRICTION OF PUBLICATION OF PART CLAIMED**

communications of either the RBA Cash Sustainability Working Group or the RBA BCP Working Group.

(the **Proposed Conduct**).

For the duration of interim and final authorisation, the Applicant undertakes to:

- (a) provide the ACCC with a report each month (or such other period as the ACCC may approve) setting out material activities and developments in the previous period that involved conduct enabled by this authorisation, including whether any additional parties have joined the RBA BCP Working Group or RBA Cash Sustainability Working Group.
- (b) have an external lawyer with expertise in competition law, engaged by the ABA and approved by the ACCC, in attendance at meetings of the RBA Cash Sustainability Working Group and the RBA BCP Working Group with instructions to immediately advise the attendees if, during the course of the meeting, they develop concerns that there is conduct occurring that is outside the scope of this authorisation and risks breaching the CCA.

Further detail about the Business Continuity Planning under consideration is set out in **Confidential Annexure C**.

**4.2 Application for interim authorisation**

The Applicant requests interim authorisation prior to 29 March 2024.

Armaguard previously advised the ABA that its financial position has continued to decline and [REDACTED]

Based on publicly available filings, the Applicant understands that Armaguard's Parent Guarantee will expire on 2 April 2024. [REDACTED]

While the activities of the RBA Cash Sustainability Working Group are directed at minimising the potential for a disruption to CIT services, the Applicant considers that the further development and implementation of Business Continuity Planning is essential to minimising the impacts of any potential disruption to CIT services and access to cash. The challenges facing the Armaguard business are significant, and in circumstances where there is no other national provider of CIT services, the Applicant considers it imperative that the Proposed Authorised Parties are able to implement Business Continuity Planning on an urgent basis, should the need arise. Accordingly, the Applicant seeks interim authorisation by 29 March 2024. [REDACTED]

There are a number of important safeguards which will mitigate the risk of the Proposed Conduct giving rise to any competitive detriment, including:

- (a) the conduct is confined to the further development and implementation of Business Continuity Planning which has been discussed and arose out of meetings of the RBA Cash Sustainability Working Group and RBA BCP Working Group under the First Interim Authorisation (AA1000654) to date;
- (b) the information that can be shared and discussed and the types of contracts, arrangements or understandings that can be reached and implemented are limited to matters that occur at, in preparation for or arise out of a meeting of the RBA Cash Sustainability Working Group or



## RESTRICTION OF PUBLICATION OF PART CLAIMED

the RBA BCP Working Group, chaired by representatives of the RBA and attended by representatives from Commonwealth Treasury as well as an external competition lawyer;

- (c) as with First Authorisation Application, any discussions, contracts, arrangements or understandings can only occur for prescribed purposes, namely, for the purposes of supporting the continued and safe distribution and availability of cash to banks, retailers, other businesses and/or members of the public in the short-term and prior to the implementation of a longer term regulatory or industry solution and for the purposes of supporting customers and businesses who use cash in the event of, or in reasonable anticipation of, any suspension or disruption of Armaguard's CIT services; and
- (d) it is proposed that monthly reports be submitted to the ACCC regarding progress.

In these circumstances, the Applicant submits that the potential for detriment under interim authorisation is very limited and that any theoretical detriment is outweighed by the substantial public benefits of facilitating the implementation of Business Continuity Planning in the event of, or in reasonable anticipation of, a suspension or disruption to cash services in Australia.

### 4.3 Provisions of the CCA which might apply to the Proposed Conduct

The Applicant seeks authorisation in respect of the following provisions of the CCA:

- (a) cartel conduct (Division 1 of Part IV), in that the Proposed Conduct may involve contracts, arrangements or understandings containing provisions which:
  - (i) have the purpose or effect of fixing, controlling or maintaining, or providing for the fixing, controlling or maintaining of, the price or a discount, allowance, rebate or credit in relation to goods or services supplied, acquired or likely to be supplied or acquired by the parties;
  - (ii) have the purpose of preventing, restricting or limiting the acquisition or supply or likely acquisition or supply of goods or services by the parties; or
  - (iii) have the purpose of allocating customers to whom or suppliers from whom goods or services are supplied or acquired or geographical areas in which goods or services are supplied or acquired,  
(ss45AD(2), 45AD(3), 45AF, 45AG, 45AJ, and 45AK of the CCA); and
- (b) conduct, contracts, arrangements or understandings, concerted practices, exclusive dealing and other conduct that have the purpose, effect or likely effect of substantially lessening competition (ss 45(1), 46 and 47 of the CCA).

### 4.4 Term of authorisation sought

The Applicant seeks authorisation to engage in the Proposed Conduct until 30 June 2025.

## 5 Persons who may be directly impacted by the Proposed Conduct

The persons who would be directly impacted by the Proposed Conduct include:

- (a) Armaguard, and other suppliers of CIT services;
- (b) Banks (including both Member Banks and non-member banks);
- (c) Retailers, supermarkets and other businesses who distribute and utilise cash in their business;
- (d) Australia Post who distributes cash through Bank@Post;

**RESTRICTION OF PUBLICATION OF PART CLAIMED**

- (e) Australian consumers, particularly vulnerable Australians; and
- (f) The Commonwealth Government and the RBA.

**6 Counterfactual**

The Applicant was previously advised that Armaguard had insufficient self-generating funds to reinvest in the future sustainability of the cash distribution network and that its financial position has continued to decline. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] In addition, Armaguard's Parent Guarantee will also expire on 2 April 2024. As noted above, [REDACTED]

[REDACTED]

Unless short term initiatives to respond to acute issues within the cash distribution system can be developed, there is therefore a potential risk of a suspension or disruption to the supply of CIT services in Australia. Without ACCC authorisation, the Proposed Authorised Parties will be unable to implement the Business Continuity Planning that is being discussed and explored under the First Interim Authorisation (AA1000654). This would mean that in the event of, or in reasonable anticipation of, a suspension, disruption or exit of Armaguard, the Proposed Authorised Parties would be unable to implement Business Continuity Planning on a coordinated basis which would materially affect the effectiveness of Business Continuity Planning.

**7 Public benefit**

The Applicant considers that the Proposed Conduct will result in the following significant public benefits:

- (a) A disruption to CIT services and access to cash could lead to the following consequences, many of which were also previously recognised by the ACCC:<sup>3</sup>
  - (i) **A 'run' on cash:** the potential that public concern about access to cash could cause a "run" on cash in some areas, exacerbating supply issues;
  - (ii) **Safety and security concerns:** ATMs, businesses, retail team members and customers could be potentially vulnerable to security threats (such as robberies); and
  - (iii) **Urgent government intervention:** a need for government assistance to manage the above impacts, to facilitate the continued supply of CIT services and access to cash in the short term.
- (b) A coordinated industry response to Business Continuity Planning, agreed by the RBA Cash Sustainability Working Group or RBA BCP Working Group facilitated by the RBA and with the participation of Commonwealth Treasury, will support a more effective and equitable distribution of available cash in the supply chain than if the participants were required to act unilaterally and will assist to minimise impacts to customers and businesses in the event of any disruption or suspension of Armaguard's CIT services. In addition, a more effective and

<sup>3</sup> ACCC Determination (MA1000022), pp.89-90.

## RESTRICTION OF PUBLICATION OF PART CLAIMED

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equitable distribution of cash to businesses and consumers in the CIT supply chain will maximise available access to retail cash services by businesses and members of the public in metropolitan and regional areas.

### 8 Public detriment

The Applicant submits that the Proposed Conduct will result in significant public benefits and is unlikely to result in any material public detriments for the following reasons:

- (a) The Proposed Conduct is limited to the further development and implementation of Business Continuity Planning which has been discussed and is continuing to be explored as a result of the RBA Cash Sustainability Working Group and RBA BCP Working Group chaired by the RBA and attended by representatives of Commonwealth Treasury.
- (b) In addition, the Proposed Conduct can only be engaged in for **prescribed purposes**. In particular, Business Continuity Planning can only be agreed and implemented for the purposes of supporting the continued and safe distribution and availability of cash to banks, retailers, other businesses and/or members of the public in the short-term and prior to the implementation of a longer term regulatory or industry solution and to support customers and business who use cash in the event of any disruption or suspension of Armaguard's CIT services.
- (c) The Proposed Conduct will be subject to **oversight** as it is limited to discussions, agreements or the implementation of agreements which occur at, in preparation for or arise out of a meeting, meetings or communications of either the RBA Cash Sustainability Working Group or the RBA BCP Working Group which are chaired by the RBA and attended by representatives from Commonwealth Treasury. For example, protection under the authorisation would extend to discussions and meetings of the ABA Cash Workout Group who have been supporting the RBA Cash Sustainability Working Group with advice regarding structuring matters, even though the RBA and Commonwealth Treasury do not attend all meetings of this group, and to discussions among two or more Proposed Authorised Parties relating to business continuity planning workstreams which have been discussed at RBA BCP Working Group meetings.
- (d) The Proposed Conduct is **voluntary** and no Proposed Authorised Parties are required to participate in the Proposed Conduct.
- (e) The ABA and its Member Banks propose that an **external competition lawyer** attend each meeting of the RBA Cash Sustainability Working Group and the RBA BCP Working Group held under the authorisation and that **monthly reports** be submitted to the ACCC regarding progress to date.

In light of all of these circumstances, the Applicant submits that the potential for detriment is very limited and that any theoretically possible detriment is outweighed by the substantial public benefits of facilitating the development of industry responses to the challenges facing the CIT industry.

### 9 Declaration by applicant

The undersigned declare that, to the best of their knowledge and belief, the information given in response to questions in this form is true, correct and complete, that complete copies of documents required by this form have been supplied, that all estimates are identified as such and are their best estimates of the underlying facts, and that all the opinions expressed are sincere.

The undersigned undertake(s) to advise the ACCC immediately of any material change in circumstances relating to the application.

**RESTRICTION OF PUBLICATION OF PART CLAIMED**

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The undersigned are aware that giving false or misleading information is a serious offence and are aware of the provisions of sections 137.1 and 149.1 of the Criminal Code (Cth).












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**Annexure A**





ABA Member Banks

Member Bank	Contact Details
<p><b>AMP Bank Limited</b>                      Locked Bag 5059                      Parramatta NSW 2150                      Ph: 13 30 30                      ACN 081 596 009</p>	<p>[REDACTED]</p>
<p><b>Australia and New Zealand Banking Group Limited</b>                      ANZ Centre Melbourne                      833 Collins Street                      Docklands VIC 3008                      Ph: (03) 9273 5555                      ACN 005 357 522</p>	<p>[REDACTED]</p>
<p><b>Arab Bank Australia Limited</b>                      Exchange Centre                      Level 7, 20 Bridge Street                      Sydney NSW 2000                      Ph: (02) 9377 8900                      ACN 002 950 745</p>	<p>[REDACTED]</p>
<p><b>Bank Australia Limited</b>                      Private Bag 12,                      Kew VIC 3101                      Ph: (03) 9854 4644                      ACN 087 651 607</p>	<p>[REDACTED]</p>
<p><b>Bank of China (Australia) Limited</b>                      Level 12, 39-41 York Street                      Sydney NSW 2000                      Ph. (02) 8235 5888                      ACN 110 077 622</p>	<p>[REDACTED]</p>
<p><b>Bank of Queensland</b>                      Level 17, 259 Queen Street                      Brisbane QLD 4000                      Ph: (07) 3212 3494                      ACN 009 656 740</p>	<p>[REDACTED]</p>
<p><b>Bank of Sydney Limited</b>                      62 Pitt Street                      Sydney NSW 2000                      Ph: (02) 8262 9060                      ACN 093 488 629</p>	<p>[REDACTED]</p>
<p><b>Bendigo and Adelaide Bank Limited</b>                      The Bendigo Centre</p>	<p>[REDACTED]</p>

**RESTRICTION OF PUBLICATION OF PART CLAIMED**

Member Bank	Contact Details
Bendigo, Victoria 3550 Ph: 1300 361 911 ACN 068 049 178	
<b>Citigroup Pty Ltd</b> 2 Park St Sydney NSW 2000 Ph: 13 24 84 ACN 004 325 080	
<b>Commonwealth Bank of Australia</b> 48 Martin Place Sydney NSW 2000 Ph: 132 221 ACN 123 123 124	
<b>HSBC Bank Australia Limited</b> Level 36, Tower 1, International Towers Sydney 100 Barangaroo Avenue Sydney NSW 2000 Ph: (02) 9006 5888 ACN 006 434 162	
<b>ING Bank (Australia) Limited</b> 60 Margaret Street SYDNEY NSW 2000 Ph: (02) 9028 4000 ACN 000 893 292	
<b>JPMorgan Chase Bank, N.A, Sydney Branch</b> Level 18, 85 Castlereagh Street Sydney NSW 2000 Australia ABN 43 074 112 011	
<b>Macquarie Bank Limited</b> No.1 Martin Place Sydney NSW 2000 Ph: (02) 8232 3333 ACN 008 583 542	
<b>MUFG Bank Limited</b> 25/1 Macquarie Place Sydney NSW 2000 ACN 103 418 882	
<b>MyState Bank Limited</b> Level 2, 137 Harrington Street Hobart TAS 7001 Ph: 138 001	

**RESTRICTION OF PUBLICATION OF PART CLAIMED**

Member Bank	Contact Details
ACN 067 729 195	
<b>National Australia Bank Limited</b> 395 Bourke Street Melbourne VIC 3000 Ph: 13 22 65 ACN 004 044 937	
<b>Rabobank Australia Limited</b> Level 16 Tower 3/Darling Park Tower 3, 201 Sussex St, Sydney NSW 2000 Ph. (02) 8115 4000 ACN 001 621 129	
<b>Suncorp Bank (Suncorp-Metway Limited)</b> Level 28, 266 George Street Brisbane QLD 4000 Ph: (07) 3362 1222 ACN 66 010 831 722	
<b>Westpac Banking Corporation</b> Westpac Place 275 Kent Street Sydney NSW 2000 Ph: (02) 9293 9270 ACN 007 457 141	

**RESTRICTION OF PUBLICATION OF PART CLAIMED**

**Annexure B**

Contact details of other industry stakeholders.

Industry stakeholder	Contact Details
RBA	[Redacted]
Armaguard	[Redacted]
Australia Post	[Redacted]
Coles Group	[Redacted]
Woolworths Group	[Redacted]
Customer Owned Banking Association (COBA)	[Redacted]
Commonwealth Treasury	[Redacted]
Wesfarmers	[Redacted]