
From: Timothy Graham [REDACTED]
Sent: Thursday, 26 September 2019 4:17 PM
To: HANRAHAN, Kaitlin
Cc: Black, Susie
Subject: RE: New Energy Tech Consumer Code - submission deadline extension request

Dear Kaitlin,

This email constitutes FlexiGroup's final submission on the Draft Determination in respect of the *New Energy Tech Consumer Code (NETCC)*.

As a member of the Australian Finance Industry Association (**AFIA**), FlexiGroup understands that AFIA has been in discussions with the NETCC Applicants regarding proposed clause 24 wording. We support AFIA's submission to the ACCC dated 26 September 2019 which expresses support for the inclusion of credit providers not regulated by the *National Consumer Credit Protection Act 2009 (Cth)* as an option for NETCC signatories.

Consistent with FlexiGroup's detailed prior submissions dated 31 May 2019 and 29 August 2019 and our position described at the ACCC pre-decision conference on 9 September 2019, we support the consumer protection objectives contained within the NETCC provided that Buy Now Pay Later credit, which has been used to finance around 10% of all installed residential photo-voltaic systems in Australia, is not excluded.

Kind regards,

Tim Graham
General Counsel | Legal Operational Risk & Compliance

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The logo for FlexiGroup, featuring the word "flexigroup" in a lowercase, teal-colored, sans-serif font. A small registered trademark symbol (®) is located to the left of the "f".