Vaya Payment Assistance Policy

Valid as of 29 March 2024

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1. About this Policy

1.1. Purpose

The purpose of this Policy is to outline Vaya's commitment to identifying, informing, supporting, and interacting with financial hardship customers (as defined at section 4 of this policy) in accordance with the Telecommunications (Financial Hardship) Industry Standard (2024) (the Standard) as regulated by the Australian Communications and Media Authority (ACMA).

This Policy is focused on meeting the needs and expectations of financial hardship customers and as such, sets out a framework to ensure eligible customers seeking payment assistance from Vaya receive appropriate care and support to enable them to remain connected.

2. Scope and Application of this Policy

2.1. Application of this Policy

As a participant in the telecommunications industry, this Policy applies to Vaya Pty Ltd and Vaya Communications Pty Ltd and its underlying Business Units and their directors, employees and contractors ("Staff")" in relation to the supply of telecommunications products to consumers under a consumer contract.

2.2. Scope

Consumers who may have a consumer contract within the scope of this Policy with Vaya include:

- Residential (individual) customers who contract with Vaya under the Standard Form of Agreement (SFOA)
- Small business customers that are either:
 - Not-for-profit organisations with (or that may acquire) a telecommunications product that is not for resale; or
 - Small businesses under a SFOA and with an annual spend up to \$40,000

3. Statement of Intention

3.1. Commitment

We are committed to helping customers facing financial hardship maintain telecommunications access and working with them to find a sustainable solution. Financial hardship can happen to anyone, so if you find yourself in a genuine financial hardship situation, whether it be long or short term, please let us know. Financial hardship may occur where you are unable to discharge financial obligations in relation to our services due to a reasonable temporary or ongoing cause.

The goal of this Policy is to prioritise keeping customers experiencing financial hardship connected. Disconnection will only be used as a measure of last resort.

3.2. Customer Rights under this Policy

- Customers who meet the eligibility requirements contained in the Standard have a right to apply for payment assistance. Vaya will not charge customers for the provision of payment assistance or for applying for payment assistance.
- Customers seeking short-term assistance (for no more than 3 billing cycles) and customers experiencing domestic and family violence are generally not required to provide evidence in relation to an application for payment assistance.
- Vaya may request supporting documents or evidence of financial hardship circumstances from customers applying for long-term assistance (for more than 3 billing cycles) and any such evidence will be used to inform our assessment process in relation to an application for assistance.
- Customers with disabilities, special needs or from cultural and linguistically diverse backgrounds are entitled to accessibility support to make an application or to access information about this Policy.
- Customers have the right to make a complaint in relation to how we handle a guery or application in relation to payment assistance.

 Customers who make a complaint to Vaya or the TIO in relation to an application for payment assistance or seek a review of a decision made in relation to an application will not be prevented from agreeing to an arrangement for payment assistance while their complaint is being handled.

4. What is Financial Hardship?

Under the Standard, financial hardship occurs when:

- (a) a customer finds themselves unable to pay an amount that they owe Vaya under their consumer contract due to one of the following circumstances:
 - personal or household illness;
 - unemployment;
 - low or insufficient income, including reduced access to income:
 - being a victim/survivor of domestic or family violence
 - a death in the family;
 - a change in personal or family circumstances;
 - a natural disaster;
 - unexpected events or unforeseen changes that have impacted income or expenditure;
 - other reasonable causes, and
- (b) the customer also believes that they will be able to discharge their obligation to pay an owed amount if they enter into an arrangement for either short or long-term payment assistance from Vaya, where this suits their personal situation.

5. Eligible Customers

5.1. Who is eligible?

An Vaya customer is eligible for payment assistance if they meet the above definition of financial hardship. That is, the customer is experiencing one of the above-listed circumstances and owes Vaya an outstanding amount under their consumer contract and also wishes to access one or more of the options for assistance that Vaya provides in order to discharge their financial obligation to Vaya.

5.2. Assessing eligibility

To be considered an eligible customer, you must have entered into a consumer contract with Vayu, owe Vaya money in relation to that consumer contract and wish to access Vaya's payment assistance options. You must also meet the definition of financial hardship as described at section 4 of this Policy.

There are several ways that Vaya will identify eligible customers:

- Self-identification: Customers can apply for payment assistance directly (by phone, email, chat or online) or request assistance from Vaya staff in making an application.
- Staff-identification: Staff are appropriately trained to identify potential flags or patterns that may indicate financial hardship and to follow established procedures to ensure that appropriate support is provided.
- Third-party identification: We may (with the customer's consent) receive information about a customer's financial hardship and service needs from financial counsellors, social workers, carers, or other relevant individuals/organisations.
- System identification: Vaya will contact any customer with an overdue bill or missed direct debit and offer information about payment assistance.

In accordance with the Vaya Privacy Policy, we may use information about our customers and leverage data and analytics to make informed decisions about customers' potential vulnerability to financial hardship, whilst maintaining the privacy of individuals. Vaya does not base decisions about customer vulnerabilities to financial hardship through data alone but uses data responsibly to help our people be more aware of the risk factors increasing the likelihood of customers experiencing financial hardship.

6. Provision of information to at risk customers

Vaya staff are trained to recognise when a customer indicates they are a financial hardship customer and to respond accordingly by providing the customer with information about this Policy and how the customer can make an application for financial hardship assistance.

Frontline staff are trained to direct identified financial hardship customers to the appropriate specialist team so that the customer can be advised of their options in relation to financial hardship assistance and where relevant, supported to make an application, including customers with disabilities or customers from culturally or linguistically diverse backgrounds or with other special needs.

Customers will be provided with a copy of this Policy in a format suitable to their needs, including information about how to make an application in the following circumstances:

- o upon request;
- o if they have accepted our offer of information; or
- where they have advised they would like to make an application under this Policy.

Vaya will also provide information about this Policy and available options for financial hardship assistance in:

- o written bills;
- reminder notices; and communications to customers who have missed a payment.

7. Options for Financial Assistance

7.1. Hardship assistance options

Vaya offers the following options for payment assistance to eligible customers:

 temporarily postponing, extending or deferring the time for paying a bill;

- discounting a bill charge;
- payment plans which are tailored to meet a customer's ability to pay;
- spend controls;
- restrictions;
- removing non-essential features of a telecommunications product at no cost; or
- transferring the customer to a different telecommunications product that better suits their circumstances.

7.2. Types of assistance

Assistance under this Policy falls into two types:

- Short-term assistance when a customer needs assistance for no more than 3 billing cycles.
- Long-term assistance when a customer needs assistance for longer than 3 billing cycles.

Where a customer requires financial hardship assistance for longer than 3 billing cycles we can work with the customer to agree a payment arrangement for any amounts owing and/or review and assess the customer's services to determine if a cheaper plan would support them to remain connected.

8. Application and Assessment Process

8.1. Contacts

You can make an application for payment assistance by getting in contact with our Credit Services team:

Email: credit@vaya.net.au

Phone: 1300 008 292

Our Credit Services Team hours of Operation are Business days, Monday – Friday, 9am to 5pm Sydney time. You can also be put in contact with our Credit Services team via any of our existing customer contact methods to make or discuss an application.

8.2. Information customers will need to provide

We will need to identify you via our multi-factor authentication process so that we can be sure we are talking to the Vaya account holder. You should have your Vaya account and identification information readily available when making an application.

8.3. Additional information we may request

In order to adequately assess your application we may require information about your income, your total expenses, as well as the nature and expected duration of your financial hardship. We may also request that you send us additional information or documentation.

Customers experiencing domestic and family violence (DFV) will not need to provide evidence to support their application, unless the application relates to:

- (a) Long-term assistance; and
- (b) either
 - a. the amount to be repaid is more than \$1000;
 - b. you have been a customer for less than 2 months at the time of making the application; or
 - c. we reasonably believe there is a possibility of fraud.

Likewise, customers seeking short-term assistance are not required to provide evidence to support their application.

In relation to long-term assistance, evidence can be requested where:

- the amount to be repaid is more than \$1000; or
- the customer has been an Vaya customer for less than 2 months; or
- where fraud is suspected.

We will only ever request information that is necessary and relevant to your application and is not unreasonably onerous for you to provide. When we request information from you we will also provide you with our contact details so you can discuss the request with us.

8.4. How will we assess and process your application

We will follow these steps when we assess and process your application:

- We will discuss and assess your eligibility for financial hardship assistance.
- If eligible, we will work with you to agree on which options for assistance are suited to your particular circumstances.
- We will offer an arrangement based on the above.
- If you agree to the offered arrangement it will commence immediately.
- If you do not agree, you have the option of requesting a review and/or making a complaint.
- If you are not satisfied with how we handle your complaint you can contact the TIO to escalate the complaint.

8.5. Timeframes and additional information

We will provide applicants with an estimate of how long it will take to complete an assessment and we will complete all assessments within 5 business days of receiving a complete application.

We aim to advise customers of the outcome of our assessment as soon as possible but will inform the customer within 2 business days of completing the assessment.

We will advise customers immediately if it becomes clear that the customer is not eligible for financial hardship assistance under the policy.

The basic principle of an agreed financial arrangement is that the repayment should be sufficient to cover expected future use of the service (as adjusted to ensure your financial position does not worsen over a reasonable period of time) as well as providing continued

reduction of debt (i.e. you should not be going into further debt under the arrangement). The provision of false or incomplete information may result in us cancelling any financial hardship arrangement we have made.

We will let you know the outcome of our assessment and the details of any financial arrangement in writing. We will pause credit action while your application is being assessed and any such arrangement will not come into operation unless and until it is agreed with you. Upon approval of your financial hardship arrangement, we will suspend further credit management of the account whilst the agreed arrangement is in place.

Should you not meet the agreed obligations of your financial hardship arrangement, or not contact us to discuss a new arrangement, or agree that the current arrangement is unable to be completed, we will make reasonable attempts to contact you before recommencing credit management on your account.

You can monitor the progress of your application by contacting us at any time.

9. External Support

To speak to a financial counsellor contact the National Debt Hotline on 1800 007 007. This free hotline is open from 9.30am to 4.30pm Monday to Friday. There are also more tools and resources available online at http://www.ndh.org.au/. Calls to major support services are free of charge.

10. Complaints

At Vaya we recognise the rights of our customers and former customers to make complaints and to have any proposed resolution of their complaints accepted by them before Vaya implements that resolution.

If you are not happy with our products or services, we would like to know. To make a complaint, call us on 1300 808 300 or submit in writing online at Vaya.com.au/help/contact/complaints. If you wish to obtain a hard copy of the Vaya Complaints Handling Policy, please contact our friendly customer service team and let us know your

preferred postal address and we will be happy to send you a copy in the mail.

You can also make a complaint to the TIO here: https://www.tio.com.au/ and via phone here: 1800 062 058 if unsatisfied with the way we have handled you complaint.

Making a complaint to us or the TIO will not prevent you from agreeing to a payment assistance arrangment with us.

11. Review

In accordance with the Standard this Policy is approved by the Head of Vaya and is reviewed annually so that any relevant changes can be made to ensure the Policy remains fit for purpose. Vaya may also amend this Policy at any time in response to regulatory or legislative changes, significant events, or the identification of service improvements.