

Australia's Best Program Delivery Company

Partnering to deliver the change needed for a better future

Seven Consulting Regulatory Compliance



TEAMWORK • TRANSPARENCY • DELIVERY

Seven Consulting - Services





Program Delivery

We deliver some of Australia's most complex and challenging agile, traditional and hybrid programs. We work with our clients to understand their organisational and program characteristics. These inform how we design our delivery approach to produce the best outcome for our clients. The majority of our Consultants are scaled agile (SAFe) certified and manage billions of dollars of transformation programs that range in size from <\$1m to >\$500m.



PMO Services

We provide PMO establishment and management, PMO analysis and scheduling services, and tools for some of the largest organisations in Australia. This can range from scheduling services, to running the PMO for \$1.5bn programs, to ePMO management.

All of our clients are reference sites

Seven Consulting – Products & Services





Change Management Services

From Q2 2023, we will provide Change Management services across the entire lifecycle of a program from early analysis of the problem statement to delivering a solution that realises the intended benefits.



Delivery Consulting

We provide delivery capability uplift, sponsor and project manager training, portfolio and program reviews to assist our clients improve their program delivery. We have successfully provided these services to over 50 clients.



Delivery Tools

Seven Consulting has designed and developed world leading tools to assist our clients optimise their portfolio, design their delivery approach and provide deep weekly delivery insights. These tools are used successfully on over \$5bn of Programs annually.

All of our clients are reference sites

Our Clients



Seven Consulting has a proven track record delivering critical outcomes for Australian organisations across industries and domains. 100% of our clients are reference sites.

Commonwealth Bank Client Since 2005	Client Since 2009	AMP Client Since 2012	Woolworths Australiais fresh food people Client Since 2012	nab Client Since 2013	MACQUARIE Client Since 2014	futurefund Australia's Sovereign Wealth Fund Client Since 2015	Colonial First State	Client Since 2017
Client Since 2017	alintaenergy Client Since 2018	Client Since 2018	EXAMPLE A CONTRACT OF A CONTRACT	ASX ASX AISTACLAAN SECURITIES EXCHANGE Client Since 2019	THE UNIVERSITY OF SYDNEY Client Since 2019	airservices Client Since 2020	AUSTRALIAN IN STITUTE of COMPANY DIRECTORS Client Since 2020	Discounties of the second seco
Client Since 2021	CSR Client Since 2021	MELBOURNE DIS GRAMMAR AN ANGLICAN SCHOOL Client Since 2021	Client Since 2021	Client Since 2022	MONASH University Client Since 2022	Client Since 2022	vic roads Client Since 2022	Client Since 2022
		An Australian Gover	MELBOURNE Equ	uity trees	FUX post post post client s	APE	ess ince 2022	

Australia's Best Program Delivery Company

Our clients and team are our top priority



Client Satisfaction Survey Results

Year	Satisfaction rating	Survey questions
2022	99.20%	13,191
2021	99.15%	15,932
2020	98.87%	14,455
2019	99.08%	14,949
2018	98.65%	15,450
2017	99.08%	9,691
2016	98.94%	10,336

100% of our clients are reference sites

future fund

Australia's Sovereign Wealth Fund

"Bright and solutions focused consultants, with whom it has been a pleasure to work with."



"Seven have gone above and beyond to make this implementation a success. With short notice their consultants jumped in and made a significant impact."

Woolworths 🍈

"No fuss, just good, honest and consistent project delivery"



"Very professional" "Great consulting skills"



"Consistent high quality of project management consultants." "All consultants are highly professional, and delivery focused."

Team Satisfaction Survey Results

Survey Date	Satisfaction rating
Dec'22	97.82%
Jun'22	98.20%
Dec'21	97.92%
Jun'21	98.40%
Dec'20	97.90%
Jun'20	98.51%



How do we get 98%+ client satisfaction?



Why all our clients are reference sites.



Hands-on ownership



High employee engagement, low turnover with **no** contractors



At a minimum, there is a monthly Quality Assurance review of the consultant's work.



Bench support available to all consultants at no cost to the client



Extensive mentoring and training support strong IP and knowledge sharing including internal project training, majority of our team are SAFe certified.



Holiday and sick leave cover for assignments



Strong in-house tooling to support consultants, clients and quality assurance

How our values impact our delivery?





Teamwork

Teamwork has to be at the core because you can't deliver big projects without great teamwork – we focus on ensuring that the Seven team, the client team and vendors work seamlessly together.



Transparency

Assumptions and poor communications kill projects, whereas openness is the foundation of good relationships and reliable delivery. We remain a completely independent consultancy.



Delivery

A strong emphasis on outcomes focuses the team and grows confidence. With a confident attitude, expert personnel and effective teams we always deliver to our client's high expectations.

Regulatory Compliance



The cost of non-compliance is significant (both financial penalties, loss of trust and reputational damage) and in some cases prohibitive (loss of license to operate). As new legislation is passed, organisations are increasingly faced with pressure from the regulators to comply with new the legislation in compressed timeframes and at significant cost to the organisations.

This capability statement outlines considerations across a variety of compliance obligations for companies spanning banking, payment, utilities and Consumer goods. It summarises Seven Consulting extensive experience in the area and high lights examples of how we can and are assisting clients in meeting their obligations.

Faced with high demand for change, constrained project budgets and a changing compliance landscape, we have seen business struggle to ensure the process and systems controls needed are in place and robust. Increased reliance on technology to meet compliance obligations had introduced a greater risk of systemic failure resulting in large volumes of non-compliance. Compliance program funding competes with other investment opportunities that often have strong projected financial or customer satisfaction returns. But similar to public investment often the full impact of non-compliance is not factored in when funding is allocated.

Regulator attitudes and public opinion has dramatically shifted in the past years and companies have come to realise that non-compliance is not an option. The real cost of non-compliance have been laid bare and they are broad. Negative consumer sentiment, significant reductions in market capitalisation, remediation costs, executive and board turnover and in extreme cases companies shutting down have all been outcomes from not taking compliance obligations seriously. This has raised pressure on companies to successfully and rapidly deliver on compliance obligations and play their part in society in a more responsible way.

This creates a need to think about meeting compliance obligation as part of everything the company does wherever this is possible, not as a separate activity.

How are compliance programs viewed?



Based on our considerable experience in compliance projects, Seven Consulting would offer the following observations on how organisations view their compliance portfolios.

First, Regulatory and Compliance programs have a very important but often ignored "image problem" within project management and delivery communities:

- They are perceived by many people as having no real benefits
- They are generally exposed to higher levels of change and uncertainty as regulators refine their legislation
- They typically involve working with at least some old, poorly maintained "legacy" systems
- They are not seen as important as some "cool" new customer-facing projects
- They rarely involve and leading-edge or innovative technology
- They are often seen by senior management as a burden rather than an opportunity
- They are not perceived as great career-building opportunities

These perceptions add an additional layer of organisational and people-related complexity to already complex projects. Our advice:

- Take them seriously
- Invest in them properly
- Prioritise them at or near the top of your list
- Execute them to high standards
- Ensure active "C-Level" governance

Not doing so introduces a very real and significant risk of organisations losing their 'social' license as was seen with financial services during the Royal commission.

There need to address compliance in two ways:

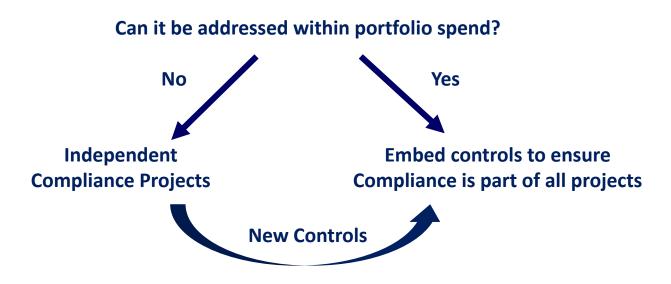


To ensure compliance costs don't become an unreasonable financial burden it is important that we look to address compliance within existing projects unless new requirements emerge that require additional focus.

Through the enterprise portfolio ensuring that all programs and projects have compliance at the core, designed appropriate controls and quality assurance to ensure that as the business changes it maintains or enhances its level of compliance.

When new compliance obligations are identified robust assessment is needed to assess the most efficient mechanism to reach compliance. This could be achieved through adding scope to existing projects and programs or creating stand alone projects and programs with the sole focus of reaching compliance.

New obligation



The Banking Royal Commission



The Royal Commission into Misconduct in the Banking, Superannuation & Financial Services Industry, also referred to as the "Hayne Report".

Background:

On the 14 December 2017 Commissioner Kenneth M Hayne was instructed to conduct a commission into the misconduct in the Banking, Superannuation and Financial Services industries. The central task of the Commission was to inquire into, and report on, whether any conduct of financial services entities might have amounted to misconduct and whether any conduct, practices, behaviour or business activities by those entities fell below community standards and expectations.

Steps were taken to gather submissions and information from the public. The public submitted more than 10,000 complaints about financial services entities. Three rounds of public hearings were conducted:

- 1. The first concerning superannuation (between 6 August 2018 and 17 August 2018),
- 2. the second concerning insurance (between 10 September 2018 and 21 September 2018), and
- 3. the third (between 19 November 2018 and 30 November 2018) took evidence from CEOs, board chairs and the heads of ASIC and APRA.

An Interim Report was submitted to the Governor General on 28 September 2018. A final report was published was published on the 1st of February 2019. The full report can be read here: <u>https://www.royalcommission.gov.au/sites/default/files/2019-02/fsrc-volume-1-final-report.pdf</u>

Commissioner Hayne's final report made 76 recommendations and 24 referrals for potentially criminal conduct. The findings called for major reforms in the culture, governance and remuneration structures of the banking industry.

The Banking Royal Commission – Key findings



The Royal Commission concluded that many entities had systematically conducted business that financially benefited the entities at the cost of the clients they were serving, often breaking the law with little or no recourse.

A very high-level summary of the findings is that the conduct identified and described in the Commission's Interim Report and the further conduct identified and described in the final Report included conduct by many entities that took place over many years causing substantial loss to many customers but yielded substantial profit to the entities concerned. Some of the conduct broke the law. Those entities that broke the law were not properly held to account. And if it had not broken the law, some of the conduct fell short of the kind of behaviour the community not only expects of financial services entities but is also entitled to expect of them.

Key findings included:

- A strong alignment between product sellers and product manufacturers, resulting in cross-selling of products and conflicts of interest
- Low transparency with and respect for customers, and making the best interests and objectives of the customer secondary to those of the financial services provider
- Boards and senior management focusing on their best interests (or to the benefit of shareholders) to the detriment of customers
- A lack of voice and accountability in identifying, escalating and dealing with risk and compliance issues
- Significant cultural and leadership issues exhibited across the industry which Senior Executives and Boards have either failed to influence or failed to manage and address



Example Compliance Obligations & Seven Consulting's experience

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Banking Royal Commission – How Seven Consulting can help



Based on our considerable experience in compliance projects, Seven Consulting can help organisations plan and execute regulatory and compliance programs set up to address the recommendations of the Banking Royal Commission.

Со	nsider the Macro level considerations:	Seven Consulting's value proposition:
1.	 Separation of Duties a) Changes to organisational structures b) Changes to roles and accountabilities 	Extensive experience in helping organisations define new target operating models considering the various aspects that define success, and then running programs to successfully implement the changes. (Ref our experience 17-19)
2.	Product set changesa) Removing and migrating off productsb) Introducing new compliant products	Extensive experience in working with the business to define and build target state business capability and successfully migrating significant amounts of highly complex data to the new systems (Ref our experience 17-19)
3.	System updates requireda)To remediate system and process issuesb)To eliminate complexityc)To implement new controlsd)Implement automated risk & compliance reporting	Extensive experience in consolidating legacy systems to remove duplication and unnecessary complexity, or building either bespoke or OOTB target state solutions. (Ref our experience 17-19)
4.	Resilience built into current and future systems	Extensive experience in building resilient, future-proof solutions (Ref our experience 17-19)

Anti Money Laundering (AML)



AML/CTF regulations set by AUSTRAC requires corporates to make sure they adopt a risk-based and principlesbased approach to regulation and places the onus on reporting entities to identify, mitigate and manage their ML/TF risk, comply with AML legislation, frequently report on any suspicious activity to fight money laundering

Со	nside	r the Macro level considerations:	Seven Consulting's value proposition:	
1.	Creat a) b)	ion of Risk Framework Define AML risk assessment framework Define AML risk scoring approach	Extensive experience in working with businesses to define risk assessment framework and risk scoring approach to direct regulatory efforts towards vulnerabilities and high-risk entities (Ref our experience 17-19)	
2.	Defin a) b) c) d) e)	e AML processes, governance and reporting Create/reengineer AML processes and SOP (Standard Operating Procedure) Define AML governance model and operating rhythm Define AML roles and responsibilities Define AML reporting requirements Train staff on new AML processes	Extensive experience in leading businesses to define or reengineer their AML processes, create SOP's, define and implement operating models with roles and responsibilities, define AML reporting requirements, train staff and successfully transition to the new operating model to prevent future non-compliance, and ensure that businesses meet their AML obligations (Ref our experience 17-19)	
3.	Upda a) b)	te AML systems Review new AML requirements Enhance, implement and test new AML systems	Extensive experience in leading AML system requirements review and enhancing / implementing AML systems to help detect and report suspicious activity including the predicate offenses to money laundering (Ref our experience 17-19)	

Energy Trading – 5 Minute Settlement



On 28 November 2017, the AEMC made a final ruling to reduce the settlement period for the electricity spot price from 30 minutes to 5 minutes, starting in 2021*. This change requires the collection, storage and delivery of revenue metering data, to be based upon 5-minute intervals for use in energy settlement, network and retail billing.

Co	nsider the Macro level considerations:	Seven Consulting's value proposition:	
1.	 Upgrading IT Systems to store and process 5MS a) Changes to Core Trading and Reporting systems (i.e. Billing, Pricing, Risk, and others) b) Boosting Data Storage capabilities to report and store increased data points c) Updating integration and system testing with external providers 	Extensive experience in running system gap analysis and establishing solution roadmaps. Extensive experience in consolidating legacy systems to remove duplication and unnecessary complexity. Significant experiences with implementing tech capability uplifts. (Ref our experience 17-19)	
2.	 a) Analysis of current Metering capabilities and required remediation b) Upgrading or replacing impacted Metering Hardware 	Extensive experience in running large scale remediation programs of works including regulatory compliance works. (Ref our experience 17-19)	
3.	 a) Updating Contract T&C's and Operating Processes a) Updating of current and future contractual T&C's (Terms & Conditions) b) Changes to product offerings and review of future product roadmaps c) Review current Operating processes and remediating impacts 	Experience working with the business to define and build target state business capability. Extensive experience in successfully migrating highly complex workflow to target state with minimal impact to operations (Ref our experience 17-19)	
4.	 Review of current and future investment opportunities a) Review and realignment of current investments to match industry changes b) Review of new industry investment opportunities stemming from 5MS disruption 	Extensive experience in establishing Benefit Realisation Frameworks and setting up governance processes for Final Investment Decision (FID) (Ref our experience 17-19) *AEMC Timelines currently under review due to COVID impacts. Some requirements are expected to be shifted to 2022	

European Data Privacy – General Data Protection Regulation (GDPR)



Introduction of European Union General Data Protection Regulation (GDPR) in 2018 requires any Australian business established in Europe, or dealing with European customers or their data to comply with this privacy law. The implication stems from the requirement of implementing measures ensuring compliance with a set of privacy principles and taking a 'privacy by design' approach.

Consider the Macro level considerations:		the Macro level considerations:	Seven Consulting's value proposition:	
1.	1. Establishing Information Data Governance		Extensive experience in working with clients in establishing and running	
	a)	Implementation of strategic information governance framework	large-scale governance programs in response to changes in the compliance environment and increased oversight by the respective industry regulation bodies	
	b)	Coordinated implementation of unified information policies and procedures, including information security	(Ref our experience 17-19)	
	c)	Enhance contractual compliance by contractors and sub- contractors handling the data		
		Extensive experience in helping organisations to drive discovery and		
	a)	Implementation of required data processing, protection and monitoring mechanisms following the 'data protection by default and design' principle	capturing compliance requirements and translation of those into solutions bringing together people, processes, technology and data (Ref our experience 17-19)	
	b)	Changes to traceability and security		
	c)	Implementation of new controls over data transfers		
	d)	Implement automated risk & compliance reporting		

Our compliance experience



Organisation	Engagement description
N agl	Program Management of Regulatory Compliance, 5 Minute Settlement and Dynamic Pricing programs
alinta energy	Consultancy on FIRB (Foreign Investment Review Board) Remediation
AMP	FOFA (Future Of Financial Advice) and Stronger Super Ready Program
Commonwealth Bank	Program management and PMO of various programs including Project Custos, Financial Crime Data Assurance, Align Advice Closure Program and Regulatory Reform Program. Quality Assurance of Retail Advice Products Upgrade
Colonial First State	Program Management and PMO of Supervisory and Monitoring Program
Energy Australia	Program management of 5 Minute Settlement and global Settlement Program
Hewlett Packard Enterprise	Program management of Apollo/Mercury - Audit Remediation

Our compliance experience



Organisation	Engagement description
lendlease	Program management of Lendlease's Sustainability Reporting
Lifestyle Solutions	Project management of Government Action Plan
	Program management of Link/SuperPartners eContributions program
nab 🔐	Program management of various projects to establish NAB/MLC's SuperStream capabilities and compliance projects to support contributions and rollovers. Program Management of ASIC Product Disclosure Project and ATO Roadmap/eCommerce Simplification Quality Assurance of Encompass and of Financial Advice (FOFA) Program Management of Retail Trade Ups and Insurance Remediation
superpartners	Program management of the Insurance Remediation program
TELSTRA	PMO management of Telstra's Structural Separation Undertaking

Our compliance experience



Organisation	Engagement description
nab MLC	Program management of multiple programs to establish NAB/MLC's SuperStream capabilities including: StrongerSuper Reporting and Disclosure program, SuperStream eRollovers program and SuperStream eContributions program
Commonwealth Bank	Technical program management of CBA's SuperStream capabilities to support contributions and rollovers
superpartners	Program management of the eContributions program which introduced the SuperStream electronic messaging for contributions. Program management of the Insurance Remediation program
AMP	Quality assurance and testing for AMP's SuperStream projects
k nab	 Program management of the following programs: Advisor Service Fees (ASFs) to address issues raised by the Royal Commission regarding obligations relating to ASFs Plum Compliance program ATO Roadmap/eCommerce Simplification program Controls Transformation program ASIC Product Disclosure project Customer Response Initiative
nab 🔎	 Delivery assurance reviews of the following programs: StrongerSuper program Claims Transformation program SSBO and Regulatory Change Office

PR@JECT 7

Our projects so far:

2007 Villawood Detention Centre (Sydney)

2008 South Australian Detention Centre (Sydney)

voluntary projects to assist those who find themselves in need of help. 2012 2011

Barnardos Kingston House (Sydney)

Seven Consulting regularly gives back to the wider community, supporting our team and their families in

Cambodian School Build (Sydney)





- Erin's Place (Sydney)
- Concordia Childrens Services (Manila)
- Mad Women Foundation (Melb)



2013 Youth off the Streets (Sydney)



Jesuit Refugee House – Blaiket (Svd) • Hanover Crisis Centre (Melb)

2015



2019

- Avalon Centre (Melbourne)
- Dignity.org.au (Sydney)
- Bahay San Jose House with No Steps Foundation (Manila)







2017

- Launch Housing (Melbourne)
- Cerebral Palsy Foundation (MNL)



2016 Marian Villa (Sydney)



2021 – Mini Project 7

In 2021, Seven Consulting continued to acknowledge the importance of fostering a community presence. Despite the restrictions brought on by the COVID-19 pandemic, the Project 7 initiative was able to provide help to those community causes that needed it most. Seven Consulting team members across three cities where able to participate in multiple mini projects this year to see our Project 7 commitment through.



2020 – DONATION DRIVE

Although physical volunteering was no longer an option due to health concerns, Project 7 gave back to the community, by donating \$104,000 across 29 charities, enabling these organisations to create real change in the lives of those who need it most.



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Seven Consulting is a proud sponsor of Australia's National Football side, the CommBank Matildas and Australia's Women's Basketball team, the Seven Consulting Opals

We are extremely proud to be official sponsors of Australia's best teams. The CommBank Matildas and the Seven Consulting Opals.

We are also providing paid internships for a number of the Matildas (Tameka Yallop, and Elise Kellond-Knight), to support their post-sporting careers.

CONGRATULATIONS

USTRALIA

Seven Consulting looks forward to the **CommBank Matildas welcoming the world** to Australia and a congratulations to the Seven Consulting Opals for winning Bronze in the FIBA Women's World Cup 2022

AUSTRALIA

Seven

SEVEN CONSULTING

Tameka Yallop

Elise Kellond-Knight

Seven

Australia's Best Program Delivery Company



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Australia's Best Program Delivery Company

Award Winning Company

Woolworths *The fresh food people* Woolworths Group IT Exceptional Services Award **Winner 2018**



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