

1 July 2024

**BY EMAIL**

[REDACTED]

Mr Anthony Hilton  
Director | Competition Exemptions  
Australian Competition & Consumer Commission (**ACCC**)  
Level 1 | The Quadrant, 1 William Street Perth

Dear Mr Hilton

**Application for Authorisation by the Australian Banking Association AA1000664 (BCP Application)**

Linfox Armaguard Pty Ltd (**Armaguard**) refers to the BCP Application and its submission to the Commission regarding the Application dated 15 May 2024.

Armaguard understands that the ABA has written to the ACCC:

- regarding the ongoing need for the BCP Application given the ABA's application for authorisation dated 27 June 2024 (AA1000674-1) for conduct which includes the provision of proposed short term financial contributions to Armaguard on a conditional basis as agreed by the relevant parties in a deed entered into on 24 June 2024 (**Funding Deed**); and
- seeking to amend the BCP Application in light of the Funding Deed so that implementation of business continuity planning is limited to the circumstances in where there is a real disruption to Armaguard's supply of CIT services or if such a disruption is reasonably anticipated.

Armaguard continues to support the need for robust BCP regarding the ongoing supply of CIT services as it did in its original submission dated 15 May 2024.

In light of the ABA's proposed amendment to the BCP Application, Armaguard no longer opposes the BCP Application being granted. Armaguard submits that any decision by the ACCC to grant authorisation of the ABA's amended BCP application should be subject to such conditions as the Commission sees fit to ensure that that the potential public detriment of the proposed conduct is minimised, and the potential public benefits of the proposed conduct are optimised.

Yours faithfully

[REDACTED]

Mick Cronin  
Chief Executive Officer  
Armaguard