

## Form G

Commonwealth of Australia  
*Competition and Consumer Act 2010 — subsection 93 (1)*  
**NOTIFICATION OF EXCLUSIVE DEALING**

To the Australian Competition and Consumer Commission:

Notice is hereby given, in accordance with subsection 93 (1) of the *Competition and Consumer Act 2010*, of particulars of conduct or of proposed conduct of a kind referred to subsections 47 (2), (3), (4), (5), (6), (7), (8) or (9) of that Act in which the person giving notice engages or proposes to engage.

PLEASE FOLLOW DIRECTIONS ON BACK OF THIS FORM

### 1. Applicant

- (a) Name of person giving notice:  
*(Refer to direction 2)*

N98654 Scentre Shopping Centre Management Pty Ltd

ACN 000 712 710

Level 30

85 Castlereagh Street

NSW 2000

- (b) Short description of business carried on by that person:  
*(Refer to direction 3)*

Provider of ancillary services at Westfield Shopping Centres, including car parking services

- (c) Address in Australia for service of documents on that person:

Ruth Newfield

Senior Legal Counsel

Scentre Group

ACN 000 712 710

Level 30

85 Castlereagh Street

NSW 2000

**2. Notified arrangement**

- (a) Description of the goods or services in relation to the supply or acquisition of which this notice relates:

Provision of valet parking services at the car parks of Westfield shopping centres in NSW (each, a **Centre**).

- (b) Description of the conduct or proposed conduct:

The Applicant proposes to:

- offer free or discounted valet parking at a Centre to customers who present a Westpac-branded Credit Card (**Card**) and/or make a purchase (of a minimum specified amount) at that Centre using a Card (**Offer**); and
- refuse to make the Offer to Centre visitors who are not holders of a Card, or have not spent a minimum specified amount at a Centre using a Card.

*(Refer to direction 4)*

**3. Persons, or classes of persons, affected or likely to be affected by the notified conduct**

- (a) Class or classes of persons to which the conduct relates:  
*(Refer to direction 5)*

Users of valet car parking services at the Centres and/or holders of Cards.

- (b) Number of those persons:

- (i) At present time:

It is estimated that, in the past year, approximately 110,000 persons used valet parking services at Westfield shopping centres.

- (ii) Estimated within the next year:

*(Refer to direction 6)*

Unknown, but likely to be more than 50.

- (c) Where number of persons stated in item 3 (b) (i) is less than 50, their names and addresses:

Not applicable.

#### **4. Public benefit claims**

- (a) Arguments in support of notification:  
(Refer to direction 7)

The proposed conduct has the following public benefits:

- visitors to the Centres who are eligible for the Offer receive free or discounted valet parking from the Applicant;
- the offer may encourage competitors of the Applicant and those in the credit card services market to enter into promotions similar to the Offer.

#### **5. Market definition**

Since it is submitted that the notified conduct will not result in any lessening of competition, it is not necessary to define the applicable markets.

#### **6. Public detriments**

It is submitted that the notified conduct would not result in public detriment for the following reasons:

- valet parking at the Centre is entirely voluntary and visitors to the Centres have the option to park their vehicles in non-valet spaces;
- the general public remains free to acquire valet parking services at the Centres without any obligation to accept the Offer or be a holder of a Card;
- the Offer is similar to many loyalty promotions currently on offer in Australia for holders of credit cards; and
- the Offer will have no impact on the cost of valet parking services at the Centres.

#### **7. Further information**

- (a) Name, postal address and contact telephone details of the person authorised to provide additional information in relation to this notification:

Ruth Newfield

Senior Legal Counsel

Scentre Group

Email: [rnewfield@scentregroup.com](mailto:rnewfield@scentregroup.com)

Phone: (02) 9358 7892

Dated..... 21 October 2015 .....

Signed by/on behalf of the applicant

.....  
(Signature) **Ruth Antoinette Newfield**

.....  
(Full Name)

.....  
(Organisation) *Scentre Group*

.....  
(Position in Organisation) *Senior Legal Counsel*

## DIRECTIONS

1. In lodging this form, applicants must include all information, including supporting evidence that they wish the Commission to take into account in assessing their notification.

Where there is insufficient space on this form to furnish the required information, the information is to be shown on separate sheets, numbered consecutively and signed by or on behalf of the applicant.

2. If the notice is given by or on behalf of a corporation, the name of the corporation is to be inserted in item 1 (a), not the name of the person signing the notice, and the notice is to be signed by a person authorised by the corporation to do so.
3. Describe that part of the business of the person giving the notice in the course of the which the conduct is engaged in.
4. If particulars of a condition or of a reason of the type referred to in section 47 of the *Competition and Consumer Act 2010* have been reduced in whole or in part to writing, a copy of the writing is to be provided with the notice.
5. Describe the business or consumers likely to be affected by the conduct.
6. State an estimate of the highest number of persons with whom the entity giving the notice is likely to deal in the course of engaging in the conduct at any time during the next year.
7. Provide details of those public benefits claimed to result or to be likely to result from the proposed conduct including quantification of those benefits where possible.
8. Provide details of the market(s) likely to be affected by the notified conduct, in particular having regard to goods or services that may be substitutes for the good or service that is the subject matter of the notification.
9. Provide details of the detriments to the public which may result from the proposed conduct including quantification of those detriments where possible.

# Form G

Commonwealth of Australia  
*Competition and Consumer Act 2010 — subsection 93 (1)*  
**NOTIFICATION OF EXCLUSIVE DEALING**

To the Australian Competition and Consumer Commission:

Notice is hereby given, in accordance with subsection 93 (1) of the *Competition and Consumer Act 2010*, of particulars of conduct or of proposed conduct of a kind referred to subsections 47 (2), (3), (4), (5), (6), (7), (8) or (9) of that Act in which the person giving notice engages or proposes to engage.

PLEASE FOLLOW DIRECTIONS ON BACK OF THIS FORM

## 1. Applicant

- (a) Name of person giving notice:  
*(Refer to direction 2)*

N98655 Scentre Shopping Centre Management (VIC) Pty Ltd

ACN 007 280 908

Level 30

85 Castlereagh Street

NSW 2000

- (b) Short description of business carried on by that person:  
*(Refer to direction 3)*

Provider of ancillary services at Westfield Shopping Centres, including car parking services

- (c) Address in Australia for service of documents on that person:

Ruth Newfield

Senior Legal Counsel

Scentre Group

ACN 000 712 710

Level 30

85 Castlereagh Street

NSW 2000

**2. Notified arrangement**

- (a) Description of the goods or services in relation to the supply or acquisition of which this notice relates:

Provision of valet parking services at the car parks of Westfield shopping centres in Victoria (each, a **Centre**).

- (b) Description of the conduct or proposed conduct:

The Applicant proposes to:

- offer free or discounted valet parking at a Centre to customers who present a Westpac-branded Credit Card (**Card**) and/or make a purchase (of a minimum specified amount) at that Centre using a Card (**Offer**); and
- refuse to make the Offer to Centre visitors who are not holders of a Card, or have not spent a minimum specified amount at a Centre using a Card.

*(Refer to direction 4)*

**3. Persons, or classes of persons, affected or likely to be affected by the notified conduct**

- (a) Class or classes of persons to which the conduct relates:

*(Refer to direction 5)*

Users of valet car parking services at the Centres and/or holders of Cards.

- (b) Number of those persons:

- (i) At present time:

It is estimated that, in the past year, approximately 110,000 persons used valet parking services at Westfield shopping centres.

- (ii) Estimated within the next year:

*(Refer to direction 6)*

Unknown, but likely to be more than 50.

- (c) Where number of persons stated in item 3 (b) (i) is less than 50, their names and addresses:

Not applicable.

#### **4. Public benefit claims**

- (a) Arguments in support of notification:  
*(Refer to direction 7)*

The proposed conduct has the following public benefits:

- visitors to the Centres who are eligible for the Offer receive free or discounted valet parking from the Applicant;
- the offer may encourage competitors of the Applicant and those in the credit card services market to enter into promotions similar to the Offer.

#### **5. Market definition**

Since it is submitted that the notified conduct will not result in any lessening of competition, it is not necessary to define the applicable markets.

#### **6. Public detriments**

It is submitted that the notified conduct would not result in public detriment for the following reasons:

- valet parking at the Centre is entirely voluntary and visitors to the Centres have the option to park their vehicles in non-valet spaces;
- the general public remains free to acquire valet parking services at the Centres without any obligation to accept the Offer or be a holder of a Card;
- the Offer is similar to many loyalty promotions currently on offer in Australia for holders of credit cards; and
- the Offer will have no impact on the cost of valet parking services at the Centres.

#### **7. Further information**

- (a) Name, postal address and contact telephone details of the person authorised to provide additional information in relation to this notification:

Ruth Newfield

Senior Legal Counsel

Scentre Group

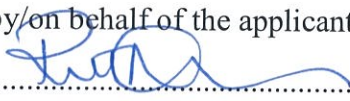
Email: [rnewfield@scentregroup.com](mailto:rnewfield@scentregroup.com)

Phone: (02) 9358 7892



Dated 21 October 2015

Signed by/on behalf of the applicant



(Signature) **Ruth Antoinette Newfield**

(Full Name)

Scentre Group

(Organisation)

Senior Legal Counsel

(Position in Organisation)

## DIRECTIONS

1. In lodging this form, applicants must include all information, including supporting evidence that they wish the Commission to take into account in assessing their notification.

Where there is insufficient space on this form to furnish the required information, the information is to be shown on separate sheets, numbered consecutively and signed by or on behalf of the applicant.

2. If the notice is given by or on behalf of a corporation, the name of the corporation is to be inserted in item 1 (a), not the name of the person signing the notice, and the notice is to be signed by a person authorised by the corporation to do so.
3. Describe that part of the business of the person giving the notice in the course of the which the conduct is engaged in.
4. If particulars of a condition or of a reason of the type referred to in section 47 of the *Competition and Consumer Act 2010* have been reduced in whole or in part to writing, a copy of the writing is to be provided with the notice.
5. Describe the business or consumers likely to be affected by the conduct.
6. State an estimate of the highest number of persons with whom the entity giving the notice is likely to deal in the course of engaging in the conduct at any time during the next year.
7. Provide details of those public benefits claimed to result or to be likely to result from the proposed conduct including quantification of those benefits where possible.
8. Provide details of the market(s) likely to be affected by the notified conduct, in particular having regard to goods or services that may be substitutes for the good or service that is the subject matter of the notification.
9. Provide details of the detriments to the public which may result from the proposed conduct including quantification of those detriments where possible.

## Form G

Commonwealth of Australia  
*Competition and Consumer Act 2010 — subsection 93 (1)*  
**NOTIFICATION OF EXCLUSIVE DEALING**

To the Australian Competition and Consumer Commission:

Notice is hereby given, in accordance with subsection 93 (1) of the *Competition and Consumer Act 2010*, of particulars of conduct or of proposed conduct of a kind referred to subsections 47 (2), (3), (4), (5), (6), (7), (8) or (9) of that Act in which the person giving notice engages or proposes to engage.

PLEASE FOLLOW DIRECTIONS ON BACK OF THIS FORM

### 1. Applicant

- (a) Name of person giving notice:  
(Refer to direction 2)

N98656 Scentre Shopping Centre Management (QLD) Pty Ltd

ACN 101 310 059

Level 30

85 Castlereagh Street

NSW 2000

- (b) Short description of business carried on by that person:  
(Refer to direction 3)

Provider of ancillary services at Westfield Shopping Centres, including car parking services

- (c) Address in Australia for service of documents on that person:

Ruth Newfield

Senior Legal Counsel

Scentre Group

ACN 000 712 710

Level 30

85 Castlereagh Street

NSW 2000

**2. Notified arrangement**

- (a) Description of the goods or services in relation to the supply or acquisition of which this notice relates:

Provision of valet parking services at the car parks of Queensland Westfield shopping centres (each, a **Centre**).

- (b) Description of the conduct or proposed conduct:

The Applicant proposes to:

- offer free or discounted valet parking at a Centre to customers who present a Westpac-branded Credit Card (**Card**) and/or make a purchase (of a minimum specified amount) at that Centre using a Card (**Offer**); and
- refuse to make the Offer to Centre visitors who are not holders of a Card, or have not spent a minimum specified amount at a Centre using a Card.

*(Refer to direction 4)*

**3. Persons, or classes of persons, affected or likely to be affected by the notified conduct**

- (a) Class or classes of persons to which the conduct relates:  
*(Refer to direction 5)*

Users of valet car parking services at the Centres and/or holders of Cards.

- (b) Number of those persons:

- (i) At present time:

It is estimated that, in the past year, approximately 110,000 persons used valet parking services at Westfield shopping centres.

- (ii) Estimated within the next year:

*(Refer to direction 6)*

Unknown, but likely to be more than 50.

- (c) Where number of persons stated in item 3 (b) (i) is less than 50, their names and addresses:

Not applicable.

**4. Public benefit claims**

- (a) Arguments in support of notification:  
*(Refer to direction 7)*

The proposed conduct has the following public benefits:

- visitors to the Centres who are eligible for the Offer receive free or discounted valet parking from the Applicant;
- the offer may encourage competitors of the Applicant and those in the credit card services market to enter into promotions similar to the Offer.

**5. Market definition**

Since it is submitted that the notified conduct will not result in any lessening of competition, it is not necessary to define the applicable markets.

**6. Public detriments**

It is submitted that the notified conduct would not result in public detriment for the following reasons:

- valet parking at the Centre is entirely voluntary and visitors to the Centres have the option to park their vehicles in non-valet spaces;
- the general public remains free to acquire valet parking services at the Centres without any obligation to accept the Offer or be a holder of a Card;
- the Offer is similar to many loyalty promotions currently on offer in Australia for holders of credit cards; and
- the Offer will have no impact on the cost of valet parking services at the Centres.

**7. Further information**

- (a) Name, postal address and contact telephone details of the person authorised to provide additional information in relation to this notification:

Ruth Newfield

Senior Legal Counsel

Scentre Group

Email: [rnewfield@scentregroup.com](mailto:rnewfield@scentregroup.com)

Phone: (02) 9358 7892

Dated 21 October 2015

Signed by/on behalf of the applicant



(Signature) **Ruth Antoinette Newfield**

(Full Name)

Scentre Group

(Organisation)

Senior Legal Counsel

(Position in Organisation)

## DIRECTIONS

1. In lodging this form, applicants must include all information, including supporting evidence that they wish the Commission to take into account in assessing their notification.

Where there is insufficient space on this form to furnish the required information, the information is to be shown on separate sheets, numbered consecutively and signed by or on behalf of the applicant.

2. If the notice is given by or on behalf of a corporation, the name of the corporation is to be inserted in item 1 (a), not the name of the person signing the notice, and the notice is to be signed by a person authorised by the corporation to do so.
3. Describe that part of the business of the person giving the notice in the course of the which the conduct is engaged in.
4. If particulars of a condition or of a reason of the type referred to in section 47 of the *Competition and Consumer Act 2010* have been reduced in whole or in part to writing, a copy of the writing is to be provided with the notice.
5. Describe the business or consumers likely to be affected by the conduct.
6. State an estimate of the highest number of persons with whom the entity giving the notice is likely to deal in the course of engaging in the conduct at any time during the next year.
7. Provide details of those public benefits claimed to result or to be likely to result from the proposed conduct including quantification of those benefits where possible.
8. Provide details of the market(s) likely to be affected by the notified conduct, in particular having regard to goods or services that may be substitutes for the good or service that is the subject matter of the notification.
9. Provide details of the detriments to the public which may result from the proposed conduct including quantification of those detriments where possible.

# Form G

Commonwealth of Australia  
*Competition and Consumer Act 2010 — subsection 93 (1)*  
**NOTIFICATION OF EXCLUSIVE DEALING**

To the Australian Competition and Consumer Commission:

Notice is hereby given, in accordance with subsection 93 (1) of the *Competition and Consumer Act 2010*, of particulars of conduct or of proposed conduct of a kind referred to subsections 47 (2), (3), (4), (5), (6), (7), (8) or (9) of that Act in which the person giving notice engages or proposes to engage.

PLEASE FOLLOW DIRECTIONS ON BACK OF THIS FORM

**1. Applicant**

- (a) Name of person giving notice:  
*(Refer to direction 2)*

N98657      Scentre Limited  
ACN 000 317 279  
Level 30  
85 Castlereagh Street  
NSW 2000

- (b) Short description of business carried on by that person:  
*(Refer to direction 3)*

Provider of ancillary services at Westfield Shopping Centres, including car parking services

- (c) Address in Australia for service of documents on that person:

Ruth Newfield  
Senior Legal Counsel  
Scentre Group  
ACN 000 712 710  
Level 30  
85 Castlereagh Street  
NSW 2000



**2. Notified arrangement**

- (a) Description of the goods or services in relation to the supply or acquisition of which this notice relates:

Provision of valet parking services at the car parks of Westfield shopping centres including those at Westfield Bondi Junction, Westfield Miranda, Westfield Carindale and Westfield Doncaster (each, a **Centre**).

- (b) Description of the conduct or proposed conduct:

The Applicant proposes to:

- offer free or discounted valet parking at a Centre to customers who present a Westpac-branded Credit Card (**Card**) and/or make a purchase (of a minimum specified amount) at that Centre using a Card (**Offer**); and
- refuse to make the Offer to Centre visitors who are not holders of a Card, or have not spent a minimum specified amount at a Centre using a Card.

*(Refer to direction 4)*

**3. Persons, or classes of persons, affected or likely to be affected by the notified conduct**

- (a) Class or classes of persons to which the conduct relates:  
*(Refer to direction 5)*

Users of valet car parking services at the Centres and/or holders of Cards.

- (b) Number of those persons:

- (i) At present time:

It is estimated that, in the past year, approximately 110,000 persons used valet parking services at Westfield shopping centres.

- (ii) Estimated within the next year:  
*(Refer to direction 6)*

Unknown, but likely to be more than 50.

- (c) Where number of persons stated in item 3 (b) (i) is less than 50, their names and addresses:

Not applicable.

#### **4. Public benefit claims**

- (a) Arguments in support of notification:  
(Refer to direction 7)

The proposed conduct has the following public benefits:

- visitors to the Centres who are eligible for the Offer receive free or discounted valet parking from the Applicant;
- the offer may encourage competitors of the Applicant and those in the credit card services market to enter into promotions similar to the Offer.

#### **5. Market definition**

Since it is submitted that the notified conduct will not result in any lessening of competition, it is not necessary to define the applicable markets.

#### **6. Public detriments**

It is submitted that the notified conduct would not result in public detriment for the following reasons:

- valet parking at the Centre is entirely voluntary and visitors to the Centres have the option to park their vehicles in non-valet spaces;
- the general public remains free to acquire valet parking services at the Centres without any obligation to accept the Offer or be a holder of a Card;
- the Offer is similar to many loyalty promotions currently on offer in Australia for holders of credit cards; and
- the Offer will have no impact on the cost of valet parking services at the Centres.

#### **7. Further information**

- (a) Name, postal address and contact telephone details of the person authorised to provide additional information in relation to this notification:

Ruth Newfield

Senior Legal Counsel

Scentre Group

Email: [rnewfield@scentregroup.com](mailto:rnewfield@scentregroup.com)

Phone: (02) 9358 7892

Dated..... 21 October 2015 .....

Signed by/on behalf of the applicant

.....  
(Signature) **Ruth Antoinette Newfield**

.....  
(Full Name) *Scentre Group*

.....  
(Organisation) *Senior Legal Counsel*

.....  
(Position in Organisation)

## DIRECTIONS

1. In lodging this form, applicants must include all information, including supporting evidence that they wish the Commission to take into account in assessing their notification.

Where there is insufficient space on this form to furnish the required information, the information is to be shown on separate sheets, numbered consecutively and signed by or on behalf of the applicant.

2. If the notice is given by or on behalf of a corporation, the name of the corporation is to be inserted in item 1 (a), not the name of the person signing the notice, and the notice is to be signed by a person authorised by the corporation to do so.
3. Describe that part of the business of the person giving the notice in the course of the which the conduct is engaged in.
4. If particulars of a condition or of a reason of the type referred to in section 47 of the *Competition and Consumer Act 2010* have been reduced in whole or in part to writing, a copy of the writing is to be provided with the notice.
5. Describe the business or consumers likely to be affected by the conduct.
6. State an estimate of the highest number of persons with whom the entity giving the notice is likely to deal in the course of engaging in the conduct at any time during the next year.
7. Provide details of those public benefits claimed to result or to be likely to result from the proposed conduct including quantification of those benefits where possible.
8. Provide details of the market(s) likely to be affected by the notified conduct, in particular having regard to goods or services that may be substitutes for the good or service that is the subject matter of the notification.
9. Provide details of the detriments to the public which may result from the proposed conduct including quantification of those detriments where possible.