

By E-mail
Private and Confidential

s 22(1)

14 November 2025

FEG Active Creditor
Department of Employment and Workplace
Relations

Your ref: FEGRP8738
Our ref: 22-41072831

WITHOUT PREJUDICE

Dear ^{s 22(1)}

**Quintis Forestry Pty Ltd (In Liquidation) (Receivers and Managers Appointed) ("QFPL") and
Quintis Sandalwood Pty Ltd (In Liquidation) (Receivers and Managers Appointed) ("QSPL")
(together, "Companies")**

We refer to your letters of 31 January 2025 and 6 March 2025 and our letter of 7 April 2025.

Background

1. The purpose of this letter is to:

(a) s 45(1), s 47G(1)(a), s 47G(1)(b)

(b) respond to your previous assertions in relation to the effect that a pooling order or
determination in respect of the ^{s 45(1), s 47G(1)(a), s 47G(1)(b)}

and

(c) invite a further without prejudice discussion with the intention of seeking a swift
and efficient resolution to this matter.

Clifford Chance

Ground Floor · 235 St Georges Terrace · Perth WA 6000 · Australia

S 47F(1)

@cliffordchance.com · cliffordchance.com

Liability limited by a scheme approved under professional standards legislation.

2. s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

3. s 45(1), s 47G(1)(a), s 47G(1)(b)

4. s 45(1), s 47G(1)(a), s 47G(1)(b)

5. We confirm, for the avoidance of doubt, that s 45(1), s 47G(1)(a), s 47G(1)(b) in accordance with the confirmation given in our letter of 7 April 2025.

Pooling

6. Your letter of 31 January 2025 asserts that s579E(9) of the Act provides only that a pooling order does not apply to the secured debts of the companies in a pooled group, and that, as a result, sections 561 and 433 of the Act still apply (where the usual conditions are met) to give priority to the debts referred to in sections 556(1)(e), (g) and (h) of the Act over the secured creditor from secured circulating assets.
7. s 45(1), s 47G(1)(a), s 47G(1)(b)

However, we agree with your observation that the precise effect of section 579E(9) is not the subject of any judicial guidance.

8. The Receivers' position (including by way of response to the matters set out in your letter in support of the department's preferred interpretation of section 579E(9) of the Act) is as follows:

(a) s 45(1), s 47G(1)(a), s 47G(1)(b)

(b) s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

- (c) The extract you have provided from the Explanatory Memorandum is not instructive one way or the other. The words "*external secured creditors are excluded from the scope of a pooling determination to the extent of their security*" does no more than recast the wording of section 579E(9) in different terms. That statement can be just as easily interpreted, and we say should be interpreted, to mean that section 579E(9) is confirmation that secured creditors sit outside the scope of, and that their rights are not affected by, a pooling order generally.
- (d) In this regard, the pooling regime (and specifically section 579E) was introduced following (and as a result of) the findings and recommendations in a number of reports and inquiries on the topic, including:
 - (i) The Australian Law Reform Commission's Insolvency Report (1998) ("**Harmer Report**"), which proposed, received submissions and made recommendations concerning a pooling regime in Australia (among other things). The pooling regime proposed by the Commission (which received no opposing submissions)¹ notably stated that a pooling order "*would not affect the rights of secured creditors. In particular, it would ensure that the rights of the holder of a floating charge are only postponed to priority creditors of the company which gave the charge*"²;
 - (ii) The Companies and Securities Advisory Committee's Corporate Groups Final Report (May 2000) ("**CASAC Report**"),³ which built on the recommendations of the Harmer Report. The CASAC Report considered the law in New Zealand and the United States, and noted that the pooling regimes in those jurisdictions did not purport to affect the rights of any secured creditor.⁴ Significantly, the CASAC Report provided a number of recommendations, including that "*The Corporations Law should permit the*

¹ Harmer Report at [857].

² Harmer Report at [856].

³ Explanatory Memorandum, *Corporations Amendment (Insolvency) Bill 2007* (Cth) 2.2—2.4.

⁴ CASAC Report at [6.66] – [6.69].

court to make pooling orders in the liquidation of two or more companies. This power should be based on the draft provision in the Harmer Report and: make clear that pooling orders do not affect the rights of external secured creditors..."⁵ (emphasis added).

- (iii) The Companies and Markets Advisory Committee's ("**CAMAC**") Rehabilitating Large and Complex Enterprise in Financial Difficulties Report (2004), built upon the early CASAC Report and further "*develop[ed] and refin[ed] the concept of pooling in the context of VA*".⁶ CAMAC's considerations of pooling noted CASAC's earlier comments that any recommended pooling regime "*would not affect the rights of external secured creditors*".⁷
- (e) The text and recommendations of these reports informs the reading of section 579E (and the Act's pooling regime generally) insofar as the Explanatory Memorandum explained that "*[t]he reforms have been developed having regard to the recommendations of a number of recent reviews into the corporate insolvency framework*"⁸ then going on to list the reports cited in the paragraphs above (amongst others).
- (f) s 45(1), s 47G(1)(a), s 47G(1)(b)

⁵ CASAC Report, p. 180, Recommendation 23.

⁶ Corporations and Markets Advisory Committee (Australia Government), *Rehabilitating large and complex enterprises in financial difficulties* (Report, 2004), 6.1.

⁷ Corporations and Markets Advisory Committee (Australia Government), *Rehabilitating large and complex enterprises in financial difficulties* (Report, 2004), 6.2.

⁸ Explanatory Memorandum, *Corporations Amendment (Insolvency) Bill 2007* (Cth), 2.2.

s 45(1), s 47G(1)(a), s 47G(1)(b)

9. To the extent that the Receivers' position as articulated above were found by a Court to be incorrect and the department's interpretation preferred, the Receivers further consider that resultant disadvantage to which the secured creditors would be put in these circumstances is such that it may not be just and equitable for a pooling order to be made in the first place having regard to section 579E(12)(e). Your letter of 23 September 2024 commented that *"pooling is likely to only result in a small reduction in the amount payable to [the secured creditor] as a proportion of the debt owed"*. s 45(1), s 47G(1)(a), s 47(G)(1)(b)

10. s 45(1), s 47G(1)(a), s 47G(1)(b)

Next steps

11. The Receivers acknowledge that pooling is a complex issue and this particular factual matrix raises novel issues that have not been the subject of judicial guidance.
12. s 45(1), s 47G(1)(a), s 47G(1)(b)
13. s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

14. s 45(1), s 47G(1)(a), s 47G(1)(b)

15. The Receivers therefore invite the department to attend a further without prejudice meeting (to be held via Teams) to explore a potential settlement of this matter ^{s 45(1), s 47G(1)(a), s 47G(1)(b)}

16. Please let us know if the department is amenable to attending such a discussion (and attendees from your side, including any lawyers you have engaged on this matter if required) and we can then circulate some proposed dates and times.

We look forward to hearing from you.

Yours sincerely

s 47F(1)

Partner
Mobile: s 47F(1)

cliffordchance.com

25 November 2025

s 47F(1)

Clifford Chance, Perth
Ground Floor
235 St Georges Terrace
Perth WA 6000

By email: s 47F(1) @cliffordchance.com; s 47F(1) @cliffordchance.com

WITHOUT PREJUDICE

Dear Colleagues

Quintis Forestry Limited ACN 080 139 966 (QFPL)
Quintis Sandalwood Pty Ltd ACN 060 122 698 (QSPL)
(both Receivers & Managers Appointed) (both in Liquidation)
(together, the Companies)

1. Thank you for your letter of 14 November 2025.
2. The department agrees, s 45(1), s 47G(1)(a), s 47G(1)(b)

that it would be sensible for the parties to explore a potential settlement in this matter via a further without prejudice meeting.

3. The department can make its representatives available for such a meeting in December 2025. At this stage, the department's representatives at such a meeting will be:
 - a. s 22(1)
 - b. s 22(1)
 - c. s 22(1)
 - d. s 22(1)
4. We understand from your letter that s 45(1), s 47G(1)(a), s 47G(1)(b)

5. To date, the department has advanced the following amounts to former employees of the Companies under the FEG Scheme:

- a. \$2,172,544.66 in relation to QFPL; and
- b. \$462,651.28 in relation to QSPL

6. s 45(1), s 47G(1)(a), s 47G(1)(b)

7. To enable the department to consider a potential resolution and ensure the discussions are productive, we would be grateful for the following information in respect of each of QFPL and QSPL:

s 45(1), s 47G(1)(a), s 47G(1)(b)

8. Should you have any queries, please contact s 22(1)

@dewr.gov.au or me on s 22(1)
dewr.gov.au.

Yours faithfully

s 22(1)

Clifford Chance

By E-mail
Private and Confidential

s 22(1)
s 22(1)
FEG Active Creditor
Department of Employment and Workplace
Relations

9 December 2025

Your ref: FEGRP8738
Our ref: 22-41072831

CONFIDENTIAL AND WITHOUT PREJUDICE

Dear s 22(1)

Quintis Forestry Pty Ltd (In Liquidation) (Receivers and Managers Appointed) ("QFPL") and Quintis Sandalwood Pty Ltd (In Liquidation) (Receivers and Managers Appointed) ("QSPL") (together, "Companies")

We refer to your letter of 25 November 2025.

Proposed without prejudice meeting

1. Thank you for your confirmation that the department is amenable to attending a without prejudice meeting to explore a potential settlement of this matter.
2. We and the Receivers are available at the following times (**all AWST**) on the following dates for that meeting:
 - (a) Thursday 11 December 2025 at 1pm;
 - (b) Tuesday 16 December 2025 at 9.30am.
3. Please let us know if any of those times are suitable for the department so that we can confirm and circulate a Teams invitation.

s 45(1), s 47G(1)(a), s 47G(1)(b)

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4. s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

5. s 45(1), s 47G(1)(a), s 47G(1)(b)

6. s 45(1), s 47G(1)(a), s 47G(1)(b)

7. s 45(1), s 47G(1)(a), s 47G(1)(b)

(a) s 45(1), s 47G(1)(a), s 47G(1)(b)

(b) s 45(1), s 47G(1)(a), s 47G(1)(b)

(c) s 45(1), s 47G(1)(a), s 47G(1)(b)

8. s 45(1), s 47G(1)(a), s 47G(1)(b)

(a) s 45(1), s 47G(1)(a), s 47G(1)(b)

(b) s 45(1), s 47G(1)(a), s 47G(1)(b)

(c) s 45(1), s 47G(1)(a), s 47G(1)(b)

9. s 45(1), s 47G(1)(a), s 47G(1)(b)

10. s 45(1), s 47G(1)(a), s 47G(1)(b)

11. We have set out in our letter of 14 November 2025 the basis on which we consider that the Receivers' position in respect of pooling is correct. s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

12. s 45(1), s 47G(1)(a), s 47G(1)(b)

13. These issues are therefore as much a driver for the Receivers in seeking to reach a settlement as the more confined issues attaching to pooling.

14. We and the Receivers are happy to discuss these issues in further detail at the proposed without prejudice meeting.

Next steps

15. We look forward to hearing from you with confirmation of your availability for the proposed without prejudice meeting.

Yours sincerely

s 47F(1)

Partner

Mobile: s 47F(1)

@cliffordchance.com

By E-mail
Private and Confidential

s 22(1)
s 22(1)

FEG Active Creditor
Department of Employment and Workplace
Relations

12 February 2026

Your ref: FEGRP8738
Our ref: 22-41072831

CONFIDENTIAL AND WITHOUT PREJUDICE

Dear ^{s 22(1)}

Quintis Forestry Pty Ltd (In Liquidation) (Receivers and Managers Appointed) ("QFPL") and Quintis Sandalwood Pty Ltd (In Liquidation) (Receivers and Managers Appointed) ("QSPL") (together, "Companies")

We refer to our previous correspondence and to our without prejudice meeting held via Teams on 18 December 2025 (**Meeting**).

The purpose of this letter is to provide the information requested by the department of the Receivers during the Meeting in relation to the issues set out in our letter dated 9 December 2025, with a view to progressing settlement discussions in relation to the department's outstanding priority claim against QFPL.

s 45(1), s 47G(1)(a), s 47G(1)(b)

1. By way of update in respect of the matters set out in our letter dated 9 December 2025:

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(a) s 45(1), s 47G(1)(a), s 47G(1)(b)

(b) s 45(1), s 47G(1)(a), s 47G(1)(b)

2. s 45(1), s 47G(1)(a), s 47G(1)(b)

3. s 45(1), s 47G(1)(a), s 47G(1)(b)

4. s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

5. s 45(1), s 47G(1)(a), s 47G(1)(b)

6. s 45(1), s 47G(1)(a), s 47G(1)(b)

7. s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

8. s 45(1), s 47G(1)(a), s 47G(1)(b)

9. s 45(1), s 47G(1)(a), s 47G(1)(b)

10. s 45(1), s 47G(1)(a), s 47G(1)(b)

11. s 45(1), s 47G(1)(a), s 47G(1)(b)

12. s 45(1), s 47G(1)(a), s 47G(1)(b)

13. s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s
47G(1)(b)

14. s 45(1), s 47G(1)(a), s 47G(1)(b)

15. s 45(1), s 47G(1)(a), s 47G(1)(b)

Outcome summary

16. s 45(1), s 47G(1)(a), s 47G(1)(b)

17. s 45(1), s 47G(1)(a), s 47G(1)(b)

18. s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

Next steps

19. The Receivers invite the department to attend a further without prejudice meeting (to be held via Teams) to discuss the matters outlined in this letter once you have had an opportunity to review and consider. Please let us know if the department is amenable to attending such a discussion (and attendees from your side) and we can then circulate some proposed dates and times.
20. In the meantime, please let us know if the department requires further clarification of any of the matters set out in this letter (including in respect of the s 45(1), s 47G(1)(a), s 47G(1)(b)).
21. The Receivers continue to reserve all their rights, including without prejudice to the question of costs of any application for directions.

Yours sincerely

s 47F(1)

Partner
Mobile: s 47F(1)

@cliffordchance.com

ANNEXURE A – s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

ANNEXURE B – s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

ANNEXURE C – s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

ANNEXURE D – s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

Clifford Chance

By E-mail
Private and Confidential

s 22(1)
s 22(1)

FEG Active Creditor
Department of Employment and Workplace
Relations

26 March 2026

Your ref: FEGRP8738
Our ref: 22-41072831

CONFIDENTIAL AND WITHOUT PREJUDICE

Dear s 22(1) and s 22(1)

Quintis Forestry Pty Ltd (In Liquidation) (Receivers and Managers Appointed) ("QFPL") and Quintis Sandalwood Pty Ltd (In Liquidation) (Receivers and Managers Appointed) ("QSPL") (together, "Companies")

1. We refer to our previous without prejudice correspondence including our letter dated 12 February 2026, our without prejudice meeting held via Teams on 27 February 2026 and to s 22(1) emails dated 2, 4 and 6 March 2026, outlining the department's proposed settlement terms ("**Proposed Settlement**").
2. Unless otherwise defined, any capitalised terms in this letter have the same meaning as in the Proposed Settlement.
3. Having carefully considered the department's proposal, we are instructed that the Receivers do not agree to the terms as presently set out in the Proposed Settlement.
4. The Receivers make the following observations in relation to the Proposed Settlement:
 - (a) s 45(1), s 47G(1)(a), s 47G(1)(b)

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s 45(1), s 47G(1)(a), s 47G(1)(b)

(b) s 45(1), s 47G(1)(a), s 47G(1)(b)

(c) s 45(1), s 47G(1)(a), s 47G(1)(b)

.

(d) s 45(1), s 47G(1)(a), s 47G(1)(b)

5. s 45(1), s 47G(1)(a), s 47G(1)(b)

6. The Receivers are otherwise willing to agree to s 45(1), s 47G(1)(a), s 47G(1)(b) proposed in s 22(1) emails of 2 and 4 March 2026, subject to documentation in an appropriate settlement deed. We acknowledge receipt of the draft settlement deed under cover of your email of 18 March 2026, which we are reviewing in parallel.

7. s 45(1), s 47G(1)(a), s 47G(1)(b)

8. We look forward to your response and are happy to discuss further at your convenience.

Yours sincerely
s 47F(1)

From: s 47F(1) [\(Unverified\)](#)
To: s 22(1)
Subject: Voice Mail (10 seconds)
Date: Tuesday, 7 April 2026 12:35:20 PM
Attachments: [audio.mp3](#)

hi s 22(1) it's s 47F(1) from clifford chance returning your call i'm around now until about 1:30 and then from 2:30 thank you

You received a voice mail from s 45(1), s 47G(1)(a), s 47G(1)(b)

Thank you for using Transcription! If you don't see a transcript above, it's because the audio quality was not clear enough to transcribe.

[Set Up Voice Mail](#)

From: s 47F(1) [@CliffordChance.com](#)
To: s 22(1) s 47F(1) [@CliffordChance.com](#)
Cc: s 47F(1) [@CliffordChance.com](#); s 22(1) s 47F(1) [@CliffordChance.com](#); s 22(1)
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL:Sensitive]
Date: Wednesday, 3 June 2026 9:50:49 AM
Attachments: [image001.jpg](#)
 s 45(1), s 47G(1)(a), s 47G(1)(b)
 s 45(1), s 47G(1)(a), s 47G(1)(b)
 s 45(1), s 47G(1)(a), s 47G(1)(b)
 s 45(1), s 47G(1)(a), s 47G(1)(b)

OFFICIAL: Sensitive

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WITHOUT PREJUDICE

Dear ^{s 22(1)},

Thank you for your time on the phone yesterday.

s 45(1), s 47G(1)(a), s 47G(1)(b)

Please see attached:

1. Further comments on the settlement deed (shown clean and as a redline against the draft previously sent to you on 8 April 2026).
s 45(1), s 47G(1)(a), s 47G(1)(b)

2. Comments on the draft FEG representation letter (shown clean and as a redline against your initial draft). Note that the Receivers will confirm the highlighted figures separately.

We look forward to hearing from you once you have discussed with the Delegate.

Kind regards

s 47F(1)

Clifford Chance
 Ground Floor, 235 St Georges Terrace
 Perth WA 6000
 Level 24, 10 Carrington Street
 Sydney NSW 2000
s 47F(1)

[cliffordchance.com](#)

OFFICIAL: Sensitive

From: s 22(1) [@dewr.gov.au](#)
Sent: Thursday, 23 April 2026 8:14 AM
To: s 47F(1) [@CliffordChance.com](#); s 47F(1) [@CliffordChance.com](#)

Cc: s 47F(1) @CliffordChance.com>; s 22(1) @dewr.gov.au>; s 47F(1) @dewr.gov.au>; s 22(1) @CliffordChance.com>; s 22(1)
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL:Sensitive]

OFFICIAL: Sensitive

WITHOUT PREJUDICE

Dear s 47F(1) and s 47F(1)

Thank you for your patience, and apologies for our delay in coming back to you.

s 45(1), s 47G(1)(a), s 47G(1)(b)

We are still reviewing the draft deed and have some minor proposed tweaks. We anticipate coming back to you early next week with a near-final version of the deed, and a view to execution shortly thereafter.

In the meantime, please find **attached** the proposed representation from the department, as required under the deed. As the department is unable to s 45(1), s 47G(1)(a), s 47G(1)(b) we propose instead to explain the settlement in simple terms and outline the reasons the department agreed to it. We are willing to provide reasonable follow-up assistance in response to any queries or requests for clarification arising from that representation.

The figures used in the draft representation are based on our internal estimates, but we will be guided by you in finalising those. Please let us know if your client is comfortable with the proposed representation or if you would like to discuss.

s 45(1), s 47G(1)(a), s 47G(1)(b)

Kind regards

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phones s 22(1) | Email: s 22(1) @dewr.gov.au
dewr.gov.au

The Department of Employment and Workplace Relations acknowledges the traditional owners and custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to them and their cultures, and Elders past, present and emerging.

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From: s 47F(1) @CliffordChance.com <s 47F(1) @CliffordChance.com>
Sent: Wednesday, 22 April 2026 10:28 PM
To: s 22(1) @dewr.gov.au>; s 47F(1) @CliffordChance.com
Cc: s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au>; s 22(1) @dewr.gov.au>; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au>
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL:Sensitive]

OFFICIAL: Sensitive

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WITHOUT PREJUDICE

Hi s 22(1),

Just checking in to see if there was an ETA on the response to our clients' further proposal and mark-up of the settlement deed.

s 45(1), s 47G(1)(a), s 47G(1)(b)

Kind regards

s 47F(1)

Counsel

Clifford Chance
Ground Floor, 235 St Georges Terrace
Perth WA 6000
Level 24, 10 Carrington Street
Sydney NSW 2000
Mobile: s 47F(1)

cliffordchance.com
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OFFICIAL: Sensitive

From: s 22(1) @dewr.gov.au>
Sent: Friday, 10 April 2026 12:13 AM
To: s 47F(1) @CliffordChance.com>
Cc: s 47F(1) @CliffordChance.com>; s 47F(1) @CliffordChance.com>;
s 22(1) @dewr.gov.au>; s 22(1) @dewr.gov.au>; s 47F(1) @dewr.gov.au>;
@CliffordChance.com>; s 22(1) @dewr.gov.au>
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL:Sensitive]

OFFICIAL: Sensitive

WITHOUT PREJUDICE

Dear s 47F(1)

Thank you for your email and proposed amendments to the draft deed.

We are presenting the below to our Commonwealth delegate and hope to revert shortly.

Kind regards

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phone s 22(1) Email: s 22(1) @dewr.gov.au
dewr.gov.au

The Department of Employment and Workplace Relations acknowledges the traditional owners and custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to them and their cultures, and Elders past, present and emerging.

OFFICIAL: Sensitive

From: s 47F(1) @CliffordChance.com>
Sent: Wednesday, 8 April 2026 2:43 PM
To: s 22(1) @dewr.gov.au>

Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au

@dewr.gov.au; s 22(1) @dewr.gov.au

Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL:Sensitive]

OFFICIAL: Sensitive

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Without prejudice

Dear s 22(1),

Further to our call yesterday, please see **attached** our proposed amendments to the deed of settlement (as provided by you on 18 March) – in clean and compare. The attached is being sent in parallel to the Receivers and remains subject their further review, comments and instructions.

s 45(1), s 47G(1)(a), s 47G(1)(b)

There are a few specific points on the deed of settlement:

s 45(1), s 47G(1)(a), s 47G(1)(b)

P

comments on the draft settlement deed. s 45(1), s 47G(1)(a), s 47G(1)(b)

Regards

s 47F(1)

s 47F(1)

Clifford Chance
Level 24, Brookfield Place
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Sydney NSW 2000
Mobile: s 47F(1) @CliffordChance.com
www.cliffordchance.com

OFFICIAL: Sensitive

From: s 47F(1)
Sent: 26 March 2026 09:35
To: s 22(1) @dewr.gov.au; s 22(1) @dewr.gov.au
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com;
s 22(1) @dewr.gov.au; s 22(1) @dewr.gov.au; s 47F(1)
@CliffordChance.com
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL:Sensitive]

Without prejudice

Dear s 22(1)

Please see the **attached** correspondence.

ds
s 47F(1)

s 47F(1)
Partner

Clifford Chance
Level 24, Brookfield Place
10 Carrington Street
Sydney NSW 2000
Mobile: +61 422 843 942
s 47F(1) @cliffordchance.com
www.cliffordchance.com

From: s 22(1) @dewr.gov.au
Sent: 18 March 2026 16:50
To: s 47F(1) @CliffordChance.com
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 47F(1)
@CliffordChance.com; s 47F(1) @CliffordChance.com; s 22(1)
@dewr.gov.au; s 22(1) @dewr.gov.au; s 22(1) @dewr.gov.au
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL:Sensitive]

OFFICIAL: Sensitive

WITHOUT PREJUDICE

Hj; s 47F(1)

Further to s 22(1) emails, please find **attached** a draft settlement deed prepared by the department giving effect to the current proposal.

Please note the draft remains subject to formal approval by our Commonwealth delegate.

We would appreciate any comments or proposed amendments, following consultation with your client and stakeholders.

Kind regards

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phone s 22(1) @dewr.gov.au
dewr.gov.au

The Department of Employment and Workplace Relations acknowledges the traditional owners and custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to them and their cultures, and Elders past, present and emerging.

OFFICIAL: Sensitive

From: s 22(1) @dewr.gov.au
Sent: Friday, 6 March 2026 12:39 PM
To: s 47F(1) @CliffordChance.com
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au;
s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au; s 47F(1) @CliffordChance.com;
s 22(1) @dewr.gov.au
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

Thanks s 47F(1).

s 45(1), s 47G(1)(a), s 47G(1)(b)

If the Receivers require the department to confirm its debt and provide bank account details, please have them contact s 22(1) or s 22(1) from our office.

I also wanted to let you know that I am going on leave today and returning 27 April 2026. s 22(1) and s 22(1) will continue to have carriage of this matter for the department in that time with s 22(1), who you may remember from your earlier meetings with us. They are all copied in to this email so you have their details.

Kind regards,

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phones s 22(1) | dewr.gov.au

The Department of Employment and Workplace Relations acknowledges the traditional owners and custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to them and their cultures, and Elders past, present and emerging.

From: s 47F(1) @CliffordChance.com <s 47F(1) @CliffordChance.com>
Sent: Friday, 6 March 2026 11:58 AM
To: s 22(1) @dewr.gov.au
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au;
s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au; s 47F(1) @CliffordChance.com;
s 22(1) @dewr.gov.au
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

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WITHOUT PREJUDICE

Thanks s 22(1),

s 45(1), s 47G(1)(a), s 47G(1)(b)

I rmed s 45(1), s 47G(1)(a), s 47G(1)(b)
without given the department 14 days' notice of their intention to do so. s 45(1), s 47G(1)(a).

C

Kind regards

s 47F(1)

Perth WA 6000
Level 24, 10 Carrington Street
Sydney NSW 2000
Mobile: s 47F(1)
[cliffordchance.com](mailto:s 47F(1)@cliffordchance.com)
cliffordchance.com

From: s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)>
Sent: Wednesday, 4 March 2026 2:19 PM
To: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)>
Cc: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)>; s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)>;
s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)>; s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)>; s 22(1) [@CliffordChance.com](mailto:s 22(1)@CliffordChance.com)>; s 22(1) [@CliffordChance.com](mailto:s 22(1)@CliffordChance.com)>; s 22(1) [@CliffordChance.com](mailto:s 22(1)@CliffordChance.com)>;
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

WITHOUT PREJUDICE

Hi s 47F(1),

s 45(1), s 47G(1)(a), s 47G(1)(b)

Kind regards,

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phone s 22(1) | dewr.gov.au

The Department of Employment and Workplace Relations acknowledges the traditional owners and custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to them and their cultures, and Elders past, present and emerging.

From: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com) <s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)>
Sent: Wednesday, 4 March 2026 12:40 PM
To: s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)>
Cc: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com); s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com); s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)>;
s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com); s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)>; s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com);
s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)>
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

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WITHOUT PREJUDICE

Hi s 22(1)

Thanks for clarifying. We are discussing with the Receivers and the secured creditors.

s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

Kind regards

s 47F(1)

C

Clifford Chance
Ground Floor, 235 St Georges Terrace
Perth WA 6000
Level 24, 10 Carrington Street
Sydney NSW 2000
Mobile: s 47F(1)
[s 47F\(1\)@cliffordchance.com](mailto:s 47F(1)@cliffordchance.com)
cliffordchance.com

From: s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)>
Sent: Monday, 2 March 2026 1:34 PM
To: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)>
Cc: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)>; s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)>;
s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)>; s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)>; s 22(1) [@CliffordChance.com](mailto:s 22(1)@CliffordChance.com)>;
[s 47F\(1\)@dewr.gov.au](mailto:s 47F(1)@dewr.gov.au)>; s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)>; s 22(1) [@CliffordChance.com](mailto:s 22(1)@CliffordChance.com)>;
[s 22\(1\)@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)>

Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

WITHOUT PREJUDICE

Hi s 47F(1),

Thank you for your time on Friday afternoon and for your email below.

Terms

The department's proposal differs slightly from what is described in your email. To avoid any misunderstanding, we have outlined it in more detail below:

s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

s 45(1), s 47G(1)(a), s 47G(1)(b)

Please let us know if you have any further questions. I will be on leave from Monday 9 March and returning on 28 April 2026. Our team of s 22(1) will continue to have carriage of the matter in my absence.

Kind regards

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phone s 22(1) | dewr.gov.au

The Department of Employment and Workplace Relations acknowledges the traditional owners and custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to them and their cultures, and Elders past, present and emerging.

From: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com) <s 47F(1)@CliffordChance.com>
Sent: Monday, 2 March 2026 9:34 AM
To: s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)
Cc: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com); s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com); s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au);
s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com); s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au); s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

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WITHOUT PREJUDICE

Hi s 22(1),

Thank you for your time on our call on Friday.

As discussed, it would be helpful if you could please send us settlement terms including the proposed scope of the releases.

s 45(1), s 47G(1)(a), s 47G(1)(b)

-
-
-
-

Please let us know if we have understood your proposal correctly.

Kind regards

s 47F(1)

Clifford Chance
Ground Floor, 235 St Georges Terrace
Perth WA 6000
Level 24, 10 Carrington Street
Sydney NSW 2000
Mobile: **s 47F(1)**
cliffordchance.com
cliffordchance.com

From: s 22(1) @dewr.gov.au
Sent: Tuesday, 24 February 2026 12:37 PM
To: s 47F(1) @CliffordChance.com
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com;
s 22(1) @dewr.gov.au; s 47F(1) @CliffordChance.com; s 22(1)
@dewr.gov.au; Poncini, Adriano (GFM-PER) <Adriano.Poncini@CliffordChance.com>
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

Hi s 47F(1),

Let's do Friday 27th at 2pm (Sydney time).

Kind regards,

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phones s 22(1) dewr.gov.au

The Department of Employment and Workplace Relations acknowledges the traditional owners and custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to them and their cultures, and Elders past, present and emerging.

From: s 47F(1) @CliffordChance.com s 47F(1) @CliffordChance.com
Sent: Tuesday, 24 February 2026 12:06 PM
To: s 22(1) @dewr.gov.au
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au;
s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au; s 47F(1) @CliffordChance.com
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

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WITHOUT PREJUDICE

Hi s 22(1),

We and the Receivers are available at the following times:

- Fri 27 Feb – 10.30am – 12 noon Perth / 1.30pm – 3pm Sydney.

- Thurs 5 Mar – 1pm – 2pm Perth / 4pm – 5pm Sydney.
- Friday 6 Mar – 11am – 1pm Perth / 2pm – 4pm Sydney **or** 2pm – 3pm Perth / 5pm – 6pm Sydney.
- Monday 9 Mar – anytime after 11am Perth / 2pm Sydney
- Tuesday 10 Mar – 11am – 12.30pm Perth / 2pm – 3.30pm Sydney **or** 1.30pm – 3pm Perth / 4.30pm – 6pm Sydney
- Thurs 12 Mar – 12 noon – 5pm Perth / 3pm – 8pm Sydney.

Kind regards

s 47F(1)

Counsel

Clifford Chance
Ground Floor, 235 St Georges Terrace
Perth WA 6000
Level 24, 10 Carrington Street
Sydney NSW 2000
Mobile: **s 47F(1)**
[s 47F\(1\)@cliffordchance.com](mailto:s 47F(1)@cliffordchance.com)
cliffordchance.com

From: s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)
Sent: Monday, 16 February 2026 2:13 PM
To: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)
Cc: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com); s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com);
s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au); s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com); s 22(1) [@CliffordChance.com](mailto:s 22(1)@CliffordChance.com)
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

Hi s 47F(1)

Thanks for your letter. The department is amenable to a further without prejudice discussion with you and your clients.

The department's representatives at that meeting are likely to be s 22(1) and me.

Please let us know times that are suitable for you and your clients. We can accommodate most dates in the next few weeks other than 18 and 19 February 2026.

Kind regards,

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phones s 22(1) | dewr.gov.au

The Department of Employment and Workplace Relations acknowledges the traditional owners and custodians of country throughout Australia and their continuing connection to land, waters and community. We pay our respects to them and their cultures, and Elders past, present and emerging.

From: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com) <s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)>
Sent: Thursday, 12 February 2026 9:41 AM
To: s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)
Cc: s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com); s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com); s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au);
s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com); s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au); s 47F(1) [@CliffordChance.com](mailto:s 47F(1)@CliffordChance.com)
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

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and know the content is safe.

WITHOUT PREJUDICE

Thanks ^{s 22(1)},

We have passed that information to the Receivers.

Please see attached a copy of our letter of today's date.

Kind regards

s 47F(1)

C

Clifford Chance
Ground Floor, 235 St Georges Terrace
Perth WA 6000
Level 24, 10 Carrington Street
Sydney NSW 2000
Mobile: s 47F(1)
cliffordchance.com
cliffordchance.com

From: s 22(1) @dewr.gov.au
Sent: Tuesday, 10 February 2026 9:41 AM
To: s 47F(1) @CliffordChance.com
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

Hi s 47(1),

s 45(1), s 47G(1)(a), s 47G(1)(b)

Are you able to advise when the Receivers expect to be in a position to provide the further information to the department discussed at our meeting in December?

Kind regards,

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phone s 22(1) dewr.gov.au

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From: s 47F(1) @CliffordChance.com < s 47F(1) @CliffordChance.com >
Sent: Tuesday, 23 December 2025 9:58 PM

To: s 22(1) @dewr.gov.au
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au;
s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

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Thank you ^{s 22(1)}, we have passed this to the Receivers.

s 47F(1)

Counsel

Clifford Chance
Ground Floor, 235 St Georges Terrace
Perth WA 6000
Level 10, 24 Carrington Street
Sydney NSW 2000
Mobile: s 47F(1)
@cliffordchance.com
cliffordchance.com

From: s 22(1) @dewr.gov.au
Sent: Tuesday, 23 December 2025 1:00 PM
To: s 47F(1) @CliffordChance.com
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com;
s 22(1) @dewr.gov.au; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

Hi s 47F(1),

Thanks for your time last Thursday.

s 45(1), s 47G(1)(a), s 47G(1)(b)

Kind regards,

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phone s 22(1) | dewr.gov.au

From: s 47F(1) @CliffordChance.com <s 47F(1) @CliffordChance.com>
Sent: Thursday, 11 December 2025 1:14 PM
To: s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au; s 22(1) @dewr.gov.au>
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au>
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

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WITHOUT PREJUDICE

Dear s 22(1),

We refer to your telephone conversation with ^{s 47F(1)} yesterday. We understand that the department has requested that we confirm our and the Receivers' availability for the proposed without prejudice Teams call on Thursday 18 December or Friday 19 December.

We confirm that we and our clients are available at 11am (Sydney time) on Thursday 18 December. Please confirm if this time is suitable for the department.

Kind regards

s 47F(1)

Ⓒ

Clifford Chance
Ground Floor, 235 St Georges Terrace
Perth WA 6000
Level 10, 24 Carrington Street
Sydney NSW 2000
Mobile: s 47F(1) @cliffordchance.com
cliffordchance.com

From: s 47F(1) @CliffordChance.com>
Sent: Tuesday, 9 December 2025 5:06 PM
To: s 22(1) @dewr.gov.au; s 47F(1) @CliffordChance.com>;
s 22(1) @dewr.gov.au>
Cc: s 47F(1) @CliffordChance.com>; s 47F(1) @CliffordChance.com>; s 47F(1) @dewr.gov.au>
@CliffordChance.com>; s 22(1) @dewr.gov.au>
Subject: WITHOUT PREJUDICE

WITHOUT PREJUDICE

Dear s 22(1),

Please see attached our letter.

Kind regards

s 47F(1)
Partner

Clifford Chance

Mobile: s 47F(1)
[@cliffordchance.com](mailto:s47f1@cliffordchance.com)
cliffordchance.com

From: s 22(1) [@dewr.gov.au](mailto:s221@dewr.gov.au)
Sent: Tuesday, 25 November 2025 1:32 PM
To: s 47F(1) [@CliffordChance.com](mailto:s47f1@CliffordChance.com); s 22(1) [@dewr.gov.au](mailto:s221@dewr.gov.au)
Cc: s 47F(1) [@CliffordChance.com](mailto:s47f1@CliffordChance.com); s 47F(1) [@CliffordChance.com](mailto:s47f1@CliffordChance.com); s 47F(1) [@CliffordChance.com](mailto:s47f1@CliffordChance.com); s 22(1) [@dewr.gov.au](mailto:s221@dewr.gov.au)
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

WITHOUT PREJUDICE

Dear s 47F(1)

Please see **attached** letter from the department.

Kind regards

s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phones s 22(1) | Email: s 22(1) [@dewr.gov.au](mailto:s221@dewr.gov.au)
dewr.gov.au

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From: s 47F(1) [@CliffordChance.com](mailto:s47f1@CliffordChance.com) s 47F(1) [@CliffordChance.com](mailto:s47f1@CliffordChance.com)
Sent: Friday, 14 November 2025 6:54 PM
To: s 22(1) [@dewr.gov.au](mailto:s221@dewr.gov.au)
Cc: s 47F(1) [@CliffordChance.com](mailto:s47f1@CliffordChance.com); s 47F(1) [@CliffordChance.com](mailto:s47f1@CliffordChance.com); s 47F(1) [@CliffordChance.com](mailto:s47f1@CliffordChance.com); s 22(1) [@dewr.gov.au](mailto:s221@dewr.gov.au); s 22(1) [@dewr.gov.au](mailto:s221@dewr.gov.au)
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

You don't often get email from s 47F(1) [@cliffordchance.com](mailto:s47f1@cliffordchance.com). [Learn why this is important](#)

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WITHOUT PREJUDICE

Dear s 22(1)

Please see attached a copy of our letter of today's date.

Kind regards

s 47F(1)

C

Clifford Chance
Ground Floor, 235 St Georges Terrace
Perth WA 6000
Level 10, 24 Carrington Street
Sydney NSW 2000
Mobile: s 47F(1)
[@cliffordchance.com](mailto:s47f1@cliffordchance.com)
cliffordchance.com

From: s 47F(1)
Sent: Thursday, 2 October 2025 1:14 PM
To: s 22(1) @dewr.gov.au>
Cc: s 47F(1) @CliffordChance.com>; s 47F(1) @CliffordChance.com>; s 47F(1) @dewr.gov.au>; s 22(1) @dewr.gov.au>
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

WITHOUT PREJUDICE

Hi s 22(1)

We have a call next week with our clients to discuss various issues, including this one. We anticipate receiving instructions to respond substantively to your letter during or shortly after that call.

Kind regards

s 47F(1)

Counsel

Clifford Chance
Ground Floor, 235 St Georges Terrace
Perth WA 6000
Level 10, 24 Carrington Street
Sydney NSW 2000
Mobile: s 47F(1) @CliffordChance.com
cliffordchance.com

From: s 22(1) @dewr.gov.au>
Sent: Tuesday, 30 September 2025 2:36 PM
To: s 47F(1) @CliffordChance.com>
Cc: s 47F(1) @CliffordChance.com>; s 47F(1) @CliffordChance.com>; s 22(1) @dewr.gov.au>; s 22(1) @dewr.gov.au>
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

Dear s 47F(1),

Are you able to advise when you expect to respond to our letter of 31 January 2025?

Kind regards,

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phones s 22(1) | dewr.gov.au

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From: s 47F(1) @CliffordChance.com <s 47F(1) @CliffordChance.com>
Sent: Monday, 21 July 2025 12:00 PM
To: s 22(1) @dewr.gov.au>
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au>; s 22(1) @dewr.gov.au>; s 22(1) @dewr.gov.au>
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

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Without Prejudice

Dear s 22(1),

With apologies for the delay in responding (I have been on leave), we are seeking instructions in relation to the matters set out in your email below and our previous correspondence and will revert in due course.

Kind regards

s 47F(1)

Counsel
Clifford Chance
Mobile: s 47F(1)
@cliffordchance.com

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<https://www.cliffordchance.com/expertise/services/finance/restructuring-and-insolvency.html>

From: s 22(1)
Sent: Monday, 7 July 2025 12:42 PM
To: s 47F(1) [<@CliffordChance.com>](mailto:@CliffordChance.com)
Cc: s 47F(1) [<@CliffordChance.com>](mailto:@CliffordChance.com); s 47F(1) [<@CliffordChance.com>](mailto:@CliffordChance.com); s 22(1) [<@dewr.gov.au>](mailto:@dewr.gov.au); s 22(1) [<@dewr.gov.au>](mailto:@dewr.gov.au)
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

Dear s 47F(1),

Are you able to advise when you expect to respond to our letter of 31 January 2025?

Are you also able to advise when the Receivers expect to lodge their Form 5602 with ASIC?

Kind regards,

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phone s 22(1) dewr.gov.au

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From: s 47F(1) [<@CliffordChance.com>](mailto:@CliffordChance.com) s 47F(1) [<@CliffordChance.com>](mailto:@CliffordChance.com)
Sent: Monday, 7 April 2025 11:29 AM
To: s 22(1) [<@dewr.gov.au>](mailto:@dewr.gov.au)
Cc: s 47F(1) [<@CliffordChance.com>](mailto:@CliffordChance.com); s 47F(1) [<@CliffordChance.com>](mailto:@CliffordChance.com); s 47F(1) [<@CliffordChance.com>](mailto:@CliffordChance.com); s 22(1) [<@dewr.gov.au>](mailto:@dewr.gov.au); s 22(1) [<@dewr.gov.au>](mailto:@dewr.gov.au); s 22(1) [<@dewr.gov.au>](mailto:@dewr.gov.au)
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

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WITHOUT PREJUDICE

Dear^s 22(1),

Please refer to the attached correspondence.

Kind regards

s 47F(1)
Counsel
Clifford Chance
Direct: s 47F(1)
Mobile: s 47F(1)
s 47F(1) [@cliffordchance.com](mailto:s 47F(1)@cliffordchance.com)

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<https://www.cliffordchance.com/expertise/services/finance/restructuring-and-insolvency.html>

From: s 22(1)
Sent: Thursday, 6 March 2025 12:36 PM
To: s 47F(1) [<s 47F\(1\)@CliffordChance.com>](mailto:s 47F(1)@CliffordChance.com)
Cc: s 47F(1) [<s 47F\(1\)@CliffordChance.com>](mailto:s 47F(1)@CliffordChance.com); s 47F(1) [<s 47F\(1\)@CliffordChance.com>](mailto:s 47F(1)@CliffordChance.com); s 22(1) [<s 22\(1\)@dewr.gov.au>](mailto:s 22(1)@dewr.gov.au); s 22(1) [<s 22\(1\)@dewr.gov.au>](mailto:s 22(1)@dewr.gov.au)
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

Dear^s 47F(1),

Please find **attached** a letter from the department.

Kind regards,

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phones s 22(1) | dewr.gov.au

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From: s 22(1)
Sent: Friday, 31 January 2025 11:36 AM
To: s 47F(1) [<s 47F\(1\)@CliffordChance.com>](mailto:s 47F(1)@CliffordChance.com)
Cc: s 47F(1) [<s 47F\(1\)@CliffordChance.com>](mailto:s 47F(1)@CliffordChance.com); s 47F(1) [<s 47F\(1\)@CliffordChance.com>](mailto:s 47F(1)@CliffordChance.com); s 22(1) [<s 22\(1\)@dewr.gov.au>](mailto:s 22(1)@dewr.gov.au); s 22(1) [<s 22\(1\)@dewr.gov.au>](mailto:s 22(1)@dewr.gov.au); s 22(1) [<s 22\(1\)@dewr.gov.au>](mailto:s 22(1)@dewr.gov.au)
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

Dear^s 47F(1)

Please find **attached** a letter from the department.

Kind regards,

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phones 22(1) | dewr.gov.au

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From: s 22(1)
Sent: Tuesday, 14 January 2025 5:11 PM
To: s 47F(1) @CliffordChance.com
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au; s 22(1) @dewr.gov.au; s 22(1) @dewr.gov.au
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

Dear s 47F(1),

Thanks for your email. We have had some staff on leave over the last month which has delayed our response. We expect to have a response to you by the end of January.

Kind regards,

s 22(1)
s 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phones 22(1) | dewr.gov.au

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From: s 47F(1) @CliffordChance.com <s 47F(1) @CliffordChance.com>
Sent: Friday, 10 January 2025 5:15 PM
To: s 22(1) @dewr.gov.au; s 22(1) @dewr.gov.au; s 22(1) @dewr.gov.au
Cc: s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 47F(1) @CliffordChance.com; s 22(1) @dewr.gov.au
Subject: RE: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

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WITHOUT PREJUDICE

Dear S 22(1) ,

Please could you let us know when you expect to be in a position to respond to our without prejudice letter of 8 November 2024.

Kind regards

s 47F(1)

Counsel

Clifford Chance

Direct: S 47F(1)

Mobile: S 47F(1)

[@cliffordchance.com](mailto:cliffordchance.com)

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<https://www.cliffordchance.com/expertise/services/finance/restructuring-and-insolvency.html>

From: S 22(1) @dewr.gov.au
Sent: Friday, 15 November 2024 9:56 AM
To: S 47F(1) @CliffordChance.com; S 22(1) @dewr.gov.au; S 22(1) @dewr.gov.au
Cc: S 47F(1) @CliffordChance.com; S 47F(1) @CliffordChance.com; S 47F(1) @CliffordChance.com; S 22(1) @dewr.gov.au
Subject: [EXT] RE: Quintis Group - Without Prejudice [SEC=OFFICIAL]

Dear S 47F(1)

Thank you for your email.

We are currently considering the matters raised in your letter and will provide a response in due course.

Kind regards

S 22(1)
S 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phone S 22(1) @dewr.gov.au
dewr.gov.au

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From: S 47F(1) @CliffordChance.com S 47F(1) @CliffordChance.com
Sent: Friday, 8 November 2024 5:13 PM
To: S 22(1) @dewr.gov.au; S 22(1) @dewr.gov.au
Cc: S 47F(1) @CliffordChance.com; S 47F(1) @CliffordChance.com; S 47F(1) @CliffordChance.com
Subject: Quintis Group - Without Prejudice

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WITHOUT PREJUDICE

Dear S 22(1) and S 22(1)

Please refer to the attached correspondence.

Kind regards

S 47F(1)

Counsel
Clifford Chance
Direct: S 47F(1)
Mobile: S 47F(1)
[@cliffordchance.com](mailto:cliffordchance.com)

GLOBAL DEBT RESTRUCTURING RESOURCES

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Fax: +61 8 9262 5522

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From: s 47F(1) [@cliffordchance.com](mailto:s 47F(1)@cliffordchance.com)
To: s 22(1)
Cc: s 22(1)
Subject: RE: WITHOUT PREJUDICE - Quintis [SEC=OFFICIAL:Sensitive]
Date: Monday, 29 June 2026 6:24:40 PM
Attachments: [image001.jpg](#)

OFFICIAL: Sensitive

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Hi s 22(1)

The Receivers have confirmed they have no issues with this wording and are happy for this to be sent.

Do you have an ETA on the revisions to the settlement deed and representation letter?

Kind regards

s 47F(1)

Clifford Chance
 Ground Floor, 235 St Georges Terrace
 Perth WA 6000
 Level 24, 10 Carrington Street
 Sydney NSW 2000
 Mobile: s 47F(1)
[s 47F\(1\)@cliffordchance.com](mailto:s 47F(1)@cliffordchance.com)
cliffordchance.com

OFFICIAL: Sensitive

From: s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)>
Sent: Monday, 29 June 2026 5:35 PM
To: s 47F(1) [@cliffordchance.com](mailto:s 47F(1)@cliffordchance.com)>
Cc: s 22(1) [@dewr.gov.au](mailto:s 22(1)@dewr.gov.au)>
Subject: RE: WITHOUT PREJUDICE - Quintis [SEC=OFFICIAL:Sensitive]

OFFICIAL: Sensitive

Hi s 47F(1),

Are you able to let me know if the below is okay to send out?

Kind regards,

s 22(1)

Active Creditor | Recovery and Litigation Branch
 Entitlements Safeguards Division
 Australian Government Department of Employment and Workplace Relations
 Phone s 22(1) | dewr.gov.au

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OFFICIAL: Sensitive

From: s 22(1)
Sent: Thursday, 25 June 2026 2:39 PM

To: S 47F(1) @CliffordChance.com
Cc: S 22(1) @dewr.gov.au>
Subject: WITHOUT PREJUDICE - Quintis

WITHOUT PREJUDICE

Dear S 47F(1),

Further to our discussion a short while ago, we have received communications from an employee creditor of Quintis Forestry about the distribution to priority creditors. We had previously advised that the Commonwealth was engaging in discussions with the Receivers about the matter and endeavoured to update the employee creditor in due course. To that end, we propose to provide a further update on the terms below:

We wanted to keep you updated on this matter. The Commonwealth has reached a position about what it considers an appropriate distribution of the Group's secured circulating assets, and expects to shortly finalise an agreement as between the Commonwealth and the Receivers. We expect the Receivers will then be in touch with other priority creditors.

Can you please advise whether the Receivers object to this form of update?

Kind regards,

S 22(1)

Active Creditor | Recovery and Litigation Branch
Entitlements Safeguards Division
Australian Government Department of Employment and Workplace Relations
Phone S 22(1) | dewr.gov.au

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