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Form 59
Rule 29.02(1)

Affidavit

No. NSD616/2021

Federal Court of Australia
District Registry: New South Wales
Division: General

Westpac Banking Corporation ABN 33 007 457 141 and another named in the Schedule
Applicants

Forum Finance Pty Limited ACN 153 301 172 and others named in the Schedule
Respondents

Affidavit of: Gurpreet Brar
Address: Level 11A, Max Towers, Sector-16B, Noida, Uttar Pradesh, India 201301
Occupation: Country Director / CEO, Veolia India
Date: 2/3/2022

Contents

Document number	Details	Paragraph	Page
1.	Affidavit of Gurpreet Brar sworn 2/3/2022	[1]	1
2.	Exhibit 'GB-1', being a paginated bundle of documents	[1]	1 - 397

I, Gurpreet Brar, say on oath:

- Exhibited to me at the time of swearing this affidavit is a paginated bundle of electronic documents marked 'Exhibit GB-1' (**GB-1**). Throughout this affidavit I refer to documents which appear within GB-1 by their page number.

Filed on behalf of (name & role of party)	Westpac Banking Corporation and Westpac New Zealand Limited, applicants		
Prepared by (name of person/lawyer)	Caitlin Murray		
Law firm (if applicable)	MinterEllison		
Tel (02) 9921 8888		Fax	02 9921 8123
Email	caitlin.murray@minterellison.com		
Address for service (include state and postcode)	Governor Macquarie Tower, 1 Farrer Place, SYDNEY NSW 2000 Our reference: CMM:AGS:1353397		

Version 3 form approved 02/05/2019

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[Signature]
N. Gardner

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2. From around 1 February 2018 to 31 May 2021, I was the Chief Financial Officer (CFO) of Veolia Environmental Services (Australia) Pty Ltd ABN 20 051 316 584 (Veolia). Since around 1 June 2021, I have been the Country Director and CEO of Veolia India.
3. My role as CFO was an Australian and New Zealand 'zone' role, meaning that I was the ultimate CFO for both Veolia and Veolia Environmental Services (NZ) Limited NZBN 9429038358623 (Veolia NZ), although Veolia NZ had a 'country' CFO who reported to me.
4. Veolia and Veolia NZ are waste management companies. As part of the business offering, Veolia and Veolia NZ use "waste digesters" to transform solid organic waste (such as food) into liquid.


Contact from Westpac Banking Corporation

5. In my role as CFO of Veolia and Veolia NZ, I was responsible for signing certain contractual documents on behalf of Veolia and Veolia NZ. I would sign documents when:
 - (a) the contractual document went above the delegation of the relevant executive; and
 - (b) I had obtained confirmation from the relevant head of business line at Veolia/Veolia NZ and from Veolia/Veolia NZ's internal legal team that the contract had been approved for signing.
6. The applicants' solicitors, MinterEllison, have provided me with a bundle of documents each of which is titled "Payment Schedule" and is identified in the table below (Payment Schedules). A copy of the Payment Schedules is at ~~pages 1 to 248 of GB-1.~~

Item	Date	Products	Apparent Customer
1.	24 August 2018	14 Orca OG25 and 23 OG50	Veolia
2.	7 September 2018	23 Orca OG100 and 23 OG50	Veolia
3.	19 September 2018	38 Orca OG100 and 10 Orca OG50	Veolia
4.	3 October 2018	43 Orca OG100	Veolia
5.	25 October 2018	31 Orca OG100	Veolia
6.	12 November 2018	25 Orca OG100, 27 Orca OG50 and 20 Orca OG25	Veolia
7.	7 December 2018	29 Orca OG50 and 40 Orca OG100	Veolia
8.	18 December 2018	2 Orca OG15, 10 Orca OG25, 6 Orca OG50	Veolia NZ

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Section 50 Fraudulent
Transaction Documents
Summary CB.F.I.1


CB.F.I.1 pF.I.1 Ln 1
CB.F.I.1 pF.I.1 Ln 1
CB.F.I.1 pF.I.4 Ln 6
CB.F.I.1 pF.I.7 Ln 11
CB.F.I.1 pF.I.9 Ln 14
CB.F.I.1 pF.I.10 Ln 16
CB.F.I.1 pF.I.11 Ln 19
CB.F.I.1 pF.I.61 Ln 1

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		and 12 Orca OG100		
9.	23 January 2019	18 Orca OG100, 10 Orca OG50 and 12 Orca OG25	Veolia	CB.F.I.1 pF.I.12 Ln 20
10.	15 February 2019	42 Orca OG100, 5 Orca OG50	Veolia	CB.F.I.1 pF.I.12 Ln 21
11.	15 February 2019	7 Orca OG50, 9 Orca OG100	Veolia NZ	CB.F.I.1 pF.I.61 Ln 2
12.	3 March 2019	12 Orca OG25, 14 Orca OG15, 22 Orca OG50 and 20 Orca OG100	Veolia	CB.F.I.1 pF.I.13 Ln 23
13.	5 April 2019	4 Orca OG25, 10 Orca OG50 and 48 Orca OG100	Veolia	CB.F.I.1 pF.I.14 Ln 24
14.	5 April 2019	10 Orca OG25, 10 Orca OG50 and 30 Orca OG100	Veolia	CB.F.I.1 pF.I.15 Ln 24
15.	23 April 2019	15 Orca OG15, 23 Orca OG25, 10 Orca OG50 and 5 Orca OG100	Veolia	CB.F.I.1 pF.I.15 Ln 25
16.	2nd May 2019	5 Orca OG50 and 8 Orca OG100	Veolia NZ	CB.F.I.1 pF.I.62 Ln 3
17.	2nd May 2019	15 Orca OG50 and 25 Orca OG100	Veolia	CB.F.I.1 pF.I.16 Ln 26
18.	2nd May 2019	15 Orca OG25, 24 Orca OG50 and 22 Orca OG100	Veolia	CB.F.I.1 pF.I.16 Ln 26
19.	4 June 2019	7 Orca OG25, 13 Orca OG50 and 22 Orca OG100	Veolia	CB.F.I.1 pF.I.17 Ln 27
20.	4 June 2019	10 Orca OG15, 20 Orca OG50 and 35 Orca OG100	Veolia	CB.F.I.1 pF.I.17 Ln 27
21.	16 October 2019	12 Orca OG50 and 26 Orca OG100	Veolia	CB.F.I.1 pF.I.25 Ln 40
22.	12 October 2020	9 Surfacide Helios System	Veolia NZ	CB.F.I.1 pF.I.71 Ln 25
23.	12 October 2020	7 lugis Tongass 250 and 15 lugis Congo 500	Veolia NZ	CB.F.I.1 pF.I.72 Ln 26
24.	12 October 2020	15 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.45 Ln 76
25.	12 October 2020	17 lugis Amazon 1000, 22 lugis Congo 500 and 6 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.45 Ln 76
26.	22 October 2020	12 lugis Amazon 1000 and 10 lugis Congo 500	Veolia	CB.F.I.1 pF.I.46 Ln 77
27.	30 October 2020	10 lugis Amazon 1000 and 35 lugis Congo 500	Veolia	CB.F.I.1 pF.I.47 Ln 79
28.	30 October 2020	12 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.47 Ln 79
29.	9 November 2020	7 lugis Amazon 1000 and 7 lugis Congo 500	Veolia NZ	CB.F.I.1 pF.I.72 Ln 27
30.	9 November 2020	9 Surfacide Helios System	Veolia NZ	CB.F.I.1 pF.I.72 Ln 28
31.	25 November 2020	2 lugis Amazon 1000, 23 lugis Congo 500 and 16 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.48 Ln 80
32.	2 December 2020	24 lugis Amazon 1000	Veolia	CB.F.I.1 pF.I.49 Ln 82
33.	2 December 2020	12 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.49 Ln 82

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34.	8 December 2020	4 lugis Amazon 1000 and 12 lugis Congo 500	Veolia NZ	CB.F.I.1 pF.I.73 Ln 29
35.	8 December 2020	9 Surfacide Helios System	Veolia NZ	CB.F.I.1 pF.I.73 Ln 30
36.	14 December 2020	4 lugis Amazon 1000 and 28 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.50 Ln 83
37.	17 December 2020	18 lugis Amazon 1000 and 32 lugis Congo 500	Veolia	CB.F.I.1 pF.I.50 Ln 84
38.	18 January 2021	28 lugis Amazon 1000, 10 lugis Congo 500 and 14 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.51 Ln 85
39.	1 February 2021	14 lugis Sagano 150, 12 lugis Amazon 1000, 10 lugis Congo 500 and 14 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.51 Ln 86
40.	1 February 2021	12 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.52 Ln 86
41.	12 February 2021	20 lugis Amazon 1000 and 3 lugis Sagano 150	Veolia	CB.F.I.1 pF.I.53 Ln 88
42.	19 February 2021	3 lugis Amazon 1000, 9 lugis Congo 500 and 7 lugis Tongass 250	Veolia NZ	CB.F.I.1 pF.I.74 Ln 31
43.	19 February 2021	9 Surfacide Helios System	Veolia NZ	CB.F.I.1 pF.I.74 Ln 32
44.	19 March 2021	12 lugis Amazon 500 and 10 lugis Tongass 250	Veolia NZ	CB.F.I.1 pF.I.75 Ln 33
45.	19 March 2021	15 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.55 Ln 92
46.	19 March 2021	12 lugis Amazon 1000, 5 lugis Congo 500 and 5 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.55 Ln 92
47.	8 April 2021	9 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.56 Ln 93
48.	8 April 2021	10 lugis Amazon 1000, 23 lugis Congo 500 and 8 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.56 Ln 94
49.	8 April 2021	18 lugis Congo 500	Veolia NZ	CB.F.I.1 pF.I.75 Ln 34
50.	3 May 2021	14 Orca OG25, 55 Orca OG50 and 137 Orca OG100	Veolia	CB.F.I.1 pF.I.58 Ln 97
51.	5 May 2021	9 lugis Amazon 1000, 6 lugis Congo 500 and 2 lugis Tongass 250	Veolia NZ	CB.F.I.1 pF.I.75 Ln 35
52.	14 May 2021	14 Orca OG15, 44 Orca OG25, 88 Orca OG50 and 140 Orca OG100	Veolia	CB.F.I.1 pF.I.59 Ln 99
53.	2 June 2021	13 lugis Amazon 1000, 8 lugis Congo 500 and 16 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.60 Ln 100
54.	2 June 2021	6 lugis Amazon 1000, 9 lugis Congo 500 and 9 lugis Tongass 250	Veolia NZ	CB.F.I.1 pF.I.76 Ln 36

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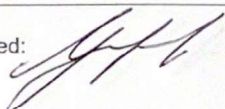
7. MinterEllison have provided me with a bundle of documents each of which is titled "Certificate of Acceptance of Delivery" and is identified in the table below (**Delivery Certificates**) that purportedly correspond to the Payment Schedules. A copy of the Delivery Certificates is at ~~pages 249 to 302 of CB-1.~~

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Transaction Documents
Summary CB.F.I.1

Item	Date	Apparent Date of Delivery	Products	Apparent Customer
1.	undated	28 August 2018	14 Orca OG25 and 23 OG50	Veolia
2.	7 September 2018	7 September 2018	23 Orca OG100 and 23 OG50	Veolia
3.	undated	19 September 2018	38 Orca OG100 and 10 Orca OG50	Veolia
4.	undated	3 October 2018	42 Orca OG100	Veolia
5.	undated	29 October 2018	31 Orca OG100	Veolia
6.	undated	17 November 2018	25 Orca OG100, 27 Orca OG50 and 20 Orca OG25	Veolia
7.	undated	7 December 2018	29 Orca OG50 and 40 Orca OG100	Veolia
8.	undated	18 December 2018	2 Orca OG15, 10 Orca OG25, 6 Orca OG50 and 12 Orca OG100	Veolia NZ
9.	undated	23 January 2019	18 Orca OG100, 10 Orca OG50 and 12 Orca OG25	Veolia
10.	undated	15 February 2019	42 Orca OG100, 5 Orca OG50	Veolia
11.	undated	15 February 2019	7 Orca OG50, 9 Orca OG100	Veolia NZ
12.	3 March 2019	3 March 2019	12 Orca OG25, 14 Orca OG15, 22 Orca OG50 and 20 Orca OG100	Veolia
13.	undated	5 April 2019	4 Orca OG25, 10 Orca OG50 and 48 Orca OG100	Veolia
14.	undated	5 April 2019	10 Orca OG25, 10 Orca	Veolia

CB.F.I.1 pF.I.1 Ln 1
CB.F.I.1 pF.I.1 Ln 1
CB.F.I.1 pF.I.4 Ln 6
CB.F.I.1 pF.I.7 Ln 11
CB.F.I.1 pF.I.9 Ln 14
CB.F.I.1 pF.I.10 Ln 16
CB.F.I.1 pF.I.11 Ln 19
CB.F.I.1 pF.I.61 Ln 1
CB.F.I.1 pF.I.12 Ln 20
CB.F.I.1 pF.I.12 Ln 21
CB.F.I.1 pF.I.61 Ln 2
CB.F.I.1 pF.I.13 Ln 23
CB.F.I.1 pF.I.14 Ln 24
CB.F.I.1 pF.I.15 Ln 24

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			OG50 and 30 Orca OG100		
15.	5 April 2019	23 April 2019	15 Orca OG15, 23 Orca OG25, 10 Orca OG50 and 5 Orca OG100	Veolia	CB.F.I.1 pF.I.15 Ln 25
16.	undated	2 May 2019	5 Orca OG50 and 8 Orca OG100	Veolia NZ	CB.F.I.1 pF.I.62 Ln 3
17.	2 May 2019	2 May 2019	15 Orca OG50 and 25 Orca OG100	Veolia	CB.F.I.1 pF.I.16 Ln 26
18.	undated	15 May 2019	15 Orca OG25, 24 Orca OG50 and 22 Orca OG100	Veolia	CB.F.I.1 pF.I.16 Ln 26
19.	4 June 2019	4 June 2019	7 Orca OG25, 13 Orca OG50 and 22 Orca OG100	Veolia	CB.F.I.1 pF.I.17 Ln 27
20.	4 June 2019	4 June 2019	10 Orca OG15, 20 Orca OG50 and 35 Orca OG100	Veolia	CB.F.I.1 pF.I.17 Ln 27
21.	16 October 2019	16 October 2019	12 Orca OG50 and 26 Orca OG100	Veolia	CB.F.I.1 pF.I.25 Ln 40
22.	12 October 2020	12 October 2020	9 Surfacide Helios System	Veolia NZ	CB.F.I.1 pF.I.71 Ln 25
23.	12 October 2020	12 October 2020	7 lugis Tongass 250 and 15 lugis Congo 500	Veolia NZ	CB.F.I.1 pF.I.72 Ln 26
24.	12 October 2020	12 October 2020	15 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.45 Ln 76
25.	12 October 2020	12 October 2020	17 lugis Amazon 1000, 22 lugis Congo 500 and 6 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.45 Ln 76
26.	22 October 2020	22 October 2020	12 lugis Amazon 1000 and 10 lugis Congo 500	Veolia	CB.F.I.1 pF.I.46 Ln 77
27.	1 November 2020	30 October 2020	10 lugis Amazon 1000 and 35 lugis Congo 500	Veolia	CB.F.I.1 pF.I.47 Ln 79
28.	1 November 2020	30 October 2020	12 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.47 Ln 79
29.	16 November 2020	9 November 2020	7 lugis Amazon 1000 and 7 lugis Congo 500	Veolia NZ	CB.F.I.1 pF.I.72 Ln 27
30.	16 November 2020	9 November 2020	9 Surfacide Helios System	Veolia NZ	CB.F.I.1 pF.I.72 Ln 28
31.	25 November 2020	25 November 2020	2 lugis Amazon 1000, 23 lugis Congo 500 and 16 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.48 Ln 80

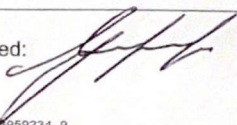
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	2 December 2020	2 December 2020	24 lugis Amazon 1000	Veolia	CB.F.I.1 pF.I.49 Ln 82
33.	2 December 2020	2 December 2020	12 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.49 Ln 82
34.	14 December 2020	10 December 2020	4 lugis Amazon 1000 and 12 lugis Congo 500	Veolia NZ	CB.F.I.1 pF.I.73 Ln 29
35.	14 December 2020	10 December 2020	9 Surfacide Helios System	Veolia NZ	CB.F.I.1 pF.I.73 Ln 30
36.	14 December 2020	14 December 2020	4 lugis Amazon 1000 and 28 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.50 Ln 83
37.	21 December 2020	17 December 2020	18 lugis Amazon 1000 and 32 lugis Congo 500	Veolia	CB.F.I.1 pF.I.50 Ln 84
38.	18 January 2021	18 January 2021	28 lugis Amazon 1000, 10 lugis Congo 500 and 14 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.51 Ln 85
39.	1 February 2021	1 February 2021	14 lugis Sagano 150, 12 lugis Amazon 1000, 10 lugis Congo 500 and 14 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.51 Ln 86
40.	1 February 2021	1 February 2021	12 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.52 Ln 86
41.	15 February 2021	12 February 2021	20 lugis Amazon 1000 and 3 lugis Sagano 150	Veolia	CB.F.I.1 pF.I.53 Ln 88
42.	22 February 2021	19 February 2021	3 lugis Amazon 1000, 9 lugis Congo 500 and 7 lugis Tongass 250	Veolia NZ	CB.F.I.1 pF.I.74 Ln 31
43.	22 February 2021	19 February 2021	9 Surfacide Helios System	Veolia NZ	CB.F.I.1 pF.I.74 Ln 32
44.	25 March 2021	19 March 2021	12 lugis Amazon 500 and 10 lugis Tongass 250	Veolia NZ	CB.F.I.1 pF.I.75 Ln 33
45.	25 March 2021	19 March 2021	15 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.55 Ln 92
46.	25 March 2021	19 March 2021	12 lugis Amazon 1000, 5 lugis Congo 500 and 5 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.55 Ln 92
47.	8 April 2021	8 April 2021	9 Surfacide Helios System	Veolia	CB.F.I.1 pF.I.56 Ln 93
48.	8 April 2021	8 April 2021	10 lugis Amazon 1000, 23 lugis Congo 500 and 8	Veolia	CB.F.I.1 pF.I.56 Ln 94

Signed:



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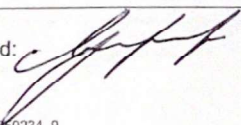
Taken by:

N. Gardner

			lugis Tongass 250		
49.	12 April 2021	8 April 2021	18 lugis Congo 500	Veolia NZ	CB.F.I.1 pF.I.75 Ln 34
50.	1 May 2021	28 April 2021	14 Orca OG25, 55 Orca OG50 and 139 Orca OG100	Veolia	CB.F.I.1 pF.I.58 Ln 97
51.	5 May 2021	5 May 2021	9 lugis Amazon 1000, 6 lugis Congo 500 and 2 lugis Tongass 250	Veolia NZ	CB.F.I.1 pF.I.75 Ln 35
52.	14 May 2021	14 May 2021	13 Orca OG15, 44 Orca OG25, 89 Orca OG50 and 140 Orca OG100	Veolia	CB.F.I.1 pF.I.59 Ln 99
53.	7 June 2021	2 June 2021	13 lugis Amazon 1000, 8 lugis Congo 500 and 16 lugis Tongass 250	Veolia	CB.F.I.1 pF.I.60 Ln 100
54.	7 June 2021	2 June 2021	6 lugis Amazon 1000, 9 lugis Congo 500 and 9 lugis Tongass 250	Veolia NZ	CB.F.I.1 pF.I.76 Ln 36

8. Each Payment Schedule and Delivery Certificate includes an execution clause which has purportedly been signed for and on behalf of Veolia or Veolia NZ by me, with my purported handwritten signature appearing above or next to my printed name (which is either typed or in handwriting).
9. I have reviewed each of my purported signatures on the Payment Schedules and Delivery Certificates. I did not sign the Payment Schedules or Delivery Certificates, nor did I authorise anyone to sign the Payment Schedules or Delivery Certificates on my behalf or to affix my electronic signature to them. My signature and electronic signature do not resemble the purported signatures on the Payment Schedules or Delivery Certificates. None of the handwriting on the Payment Schedules or Delivery Certificates is mine.
10. The first time I saw the Payment Schedules and Delivery Certificates was when they were provided to me by MinterEllison for the purpose of their enquiries into those documents and the Forum Finance group of companies.
11. The execution clauses in the Payment Schedules dated 2 June 2021 (items 53 and 54 in the table at paragraph 6 above) and the Delivery Certificates dated 7 June 2021 (items

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53 and 54 in the table at paragraph 7 above) identify my title as CFO, however, I resigned as CFO on 31 May 2021.

12. MinterEllison have also provided me with a bundle of letters which purport to transfer title, rights and interests in the Payment Schedules from various companies in the Forum Finance group of companies to third party financiers as agent for Westpac. ~~Pages 303 to 356 of CB-1~~ are a bundle of those letters as identified in the table below (the **Forum Letters**):

Item	Date	Corresponding Payment Schedule	From	To
1.	5 September 2018	24 August 2018	Forum Finance Pty Ltd	Veolia
2.	12 September 2018	7 September 2018	Forum Finance Pty Ltd	Veolia
3.	25 September 2018	19 September 2018	Forum Finance Pty Ltd	Veolia
4.	11 October 2018	3 October 2018	Forum Finance Pty Ltd	Veolia
5.	1 November 2018	25 October 2018	Forum Finance Pty Ltd	Veolia
6.	20 November 2018	12 November 2018	Forum Finance Pty Ltd	Veolia
7.	14 December 2018	7 December 2018	Forum Finance Pty Ltd	Veolia
8.	21 December 2018	18 December 2018	Orca Enviro Solutions NZ Limited	Veolia NZ
9.	1 February 2019	23 January 2019	Forum Finance Pty Ltd	Veolia
10.	22 February 2019	15 February 2019	Forum Finance Pty Ltd	Veolia
11.	22 February 2019	15 February 2019	Orca Enviro Solutions NZ Limited	Veolia NZ
12.	15 March 2019	3 March 2019	Forum Finance Pty Ltd	Veolia
13.	10 April 2019	5 April 2019	Forum Finance Pty Ltd	Veolia

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Summary CB.F.I.1

CB.F.I.1 pF.I.1 Ln 1

CB.F.I.1 pF.I.1 Ln 1

CB.F.I.1 pF.I.4 Ln 6

CB.F.I.1 pF.I.7 Ln 11

CB.F.I.1 pF.I.9 Ln 14

CB.F.I.1 pF.I.10 Ln 16

CB.F.I.1 pF.I.11 Ln 19

CB.F.I.1 pF.I.61 Ln 1

CB.F.I.1 pF.I.12 Ln 20

CB.F.I.1 pF.I.12 Ln 21

CB.F.I.1 pF.I.61 Ln 2

CB.F.I.1 pF.I.13 Ln 23

CB.F.I.1 pF.I.14 Ln 24

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	10 April 2019	5 April 2019	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.15 Ln 24
15.	29 April 2019	23 April 2019	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.15 Ln 25
16.	5 May 2019	2 May 2019	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.62 Ln 3
17.	15 May 2019	2 May 2019	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.16 Ln 26
18.	15 May 2019	2 May 2019	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.16 Ln 26
19.	7 June 2019	4 June 2019	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.17 Ln 27
20.	7 June 2019	4 June 2019	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.17 Ln 27
21.	21 October 2019	16 October 2019	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.25 Ln 40
22.	15 October 2020	12 October 2020	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.71 Ln 25
23.	15 October 2020	12 October 2020	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.72 Ln 26
24.	15 October 2020	12 October 2020	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.45 Ln 76
25.	15 October 2020	12 October 2020	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.45 Ln 76
26.	28 October 2020	22 October 2020	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.46 Ln 77
27.	4 November 2020	30 October 2020	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.47 Ln 79
28.	4 November 2020	30 October 2020	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.47 Ln 79
29.	18 November 2020	9 November 2020	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.72 Ln 27
30.	18 November 2020	9 November 2020	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.72 Ln 28
31.	27 November 2020	25 November 2020	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.48 Ln 80
32.	8 December 2020	2 December 2020	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.49 Ln 82

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33.	8 December 2020	2 December 2020	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.49 Ln 82
34.	15 December 2020	8 December 2020	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.73 Ln 29
35.	15 December 2020	8 December 2020	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.73 Ln 30
36.	18 December 2020	14 December 2020	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.50 Ln 83
37.	22 December 2020	17 December 2020	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.50 Ln 84
38.	25 January 2021	18 January 2021	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.51 Ln 85
39.	4 February 2021	1 February 2021	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.51 Ln 86
40.	4 February 2021	1 February 2021	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.52 Ln 86
41.	18 February 2021	12 February 2021	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.53 Ln 88
42.	25 February 2021	19 February 2021	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.74 Ln 31
43.	25 February 2021	19 February 2021	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.74 Ln 32
44.	26 March 2021	19 March 2021	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.75 Ln 33
45.	26 March 2021	19 March 2021	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.55 Ln 92
46.	26 March 2021	19 March 2021	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.55 Ln 92
47.	13 April 2021	8 April 2021	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.56 Ln 93
48.	13 April 2021	8 April 2021	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.56 Ln 94
49.	13 April 2021	8 April 2021	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.75 Ln 34
50.	7 May 2021	28 April 2021	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.58 Ln 97
51.	7 May 2021	5 May 2021	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.75 Ln 35

Signed:



Taken by:



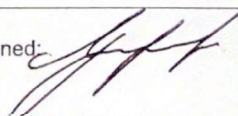
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52.	21 May 2021	14 May 2021	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.59 Ln 99
53.	9 June 2021	2 June 2021	Forum Finance Pty Ltd	Veolia	CB.F.I.1 pF.I.60 Ln 100
54.	9 June 2021	2 June 2021	Orca Enviro Solutions NZ Limited	Veolia NZ	CB.F.I.1 pF.I.76 Ln 36

13. The Forum Letters are addressed to me or, in the case of the letter at item 21 in the table at paragraph 12 above, Mr Laurie Kozlovic (the former Chief Operating Officer of Veolia). The first time I saw the Forum Letters was when they were provided to me by MinterEllison for the purpose of their enquiries into those letters and the Forum Finance group of companies.
WBC.5000.0006.0420
14. ~~Pages 357 to 396 of GB-1~~ is an undated document titled 'Guarantee and indemnity' purportedly made between Veolia (as guarantor) and IUGIS (NZ) Limited NZCN 6765037 (as beneficiary) (**Guarantee**). The Guarantee contains an execution clause which has purportedly been signed by me for and on behalf of Veolia, with my purported handwritten signature appearing above my handwritten name. I did not sign the Guarantee.
15. The first time I saw the Guarantee was when it was provided to me by MinterEllison for the purpose of their enquiries into that document and the Forum Finance group of companies. The Guarantee identifies my title as 'director' of Veolia, which is a role I held from 29 June 2018 to 31 May 2021.

Signed:



Taken by:



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EQW.5000.0002.2915

13

- 16. ~~Page 397 of GB-1~~ is a purported letter from Veolia to Forum Finance Pty Limited dated 22 May 2019 with the subject line "Authorised Signatories – ORCA Products" and which is purportedly signed by me. I did not sign this letter.

Sworn by the deponent
 at Noida, Uttar Pradesh
 in India
 on 2/3/2022

)
)
)
)
) _____
 Signature of deponent

Before me:

N. Gardner

Signature of witness
 Name of witness: Nicole Gardner
 Level 9, 5 Martin Place, Sydney NSW 2000
 Solicitor

This document was signed and witnessed over audio visual link in accordance with section 14G of the *Electronic Transactions Act 2000* (NSW).

Signed:

[Signature]

Taken by:

N. Gardner

ME_188959234_9

Schedule of Parties

No. NSD616/2021


Federal Court of Australia
 District Registry: New South Wales
 Division: Sydney

Applicants

First Applicant Westpac Banking Corporation ABN 33 007 457 141
 Second Applicant Westpac New Zealand Limited (company registration number
 company number 1763882)


Respondents

First Respondent Forum Finance Pty Limited (in liquidation) ACN 153 301 172
 Second Respondent: Basile Papadimitriou
 Third Respondent Vincenzo Frank Tesoriero
 Fourth Respondent: Forum Group Financial Services Pty Ltd (provisional
 liquidators appointed) ACN 623 033 705
 Fifth Respondent: Forum Group Pty Ltd (Receivers Appointed) (in liquidation)
 ACN 153 336 997
 Sixth Respondent: Forum Enviro Pty Ltd (provisional liquidators appointed)
 ACN 168 709 840
 Seventh Respondent: Forum Enviro (Aust) Pty Ltd (provisional liquidators
 appointed) ACN 607 484 364
 Eighth Respondent 64-66 Berkeley St Hawthorn Pty Ltd ACN 643 838 662
 Ninth Respondent 14 James Street Pty Ltd (in liquidation) ACN 638 449 206
 Tenth Respondent 26 Edmonstone Road Pty Ltd (in liquidation) ACN 622 944
 129
 Eleventh Respondent 5 Bulkara Street Pty Ltd (in liquidation) ACN 630 982 160
 Twelfth Respondent 6 Bulkara Street Pty Ltd (in liquidation) ACN 639 734 473
 Thirteenth Respondent 23 Margaret Street Pty Ltd ACN 623 715 373
 Fourteenth Respondent 1160 Glen Huntly Road Pty Ltd ACN 639 447 984
 Fifteenth Respondent 14 Kirwin Road Morwell Pty Ltd ACN 641 402 093
 Sixteenth Respondent Canner Investments Pty Ltd ACN 624 176 049

Signed: Taken by: 

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Seventeenth Respondent	123 High Street Taradale Pty Ltd ACN 639 872 512
Eighteenth Respondent	160 Murray Valley Hwy Lake Boga Pty Ltd ACN 641 392 921
Nineteenth Respondent	31 Ellerman Street Dimboola Pty Ltd ACN 641 392 887
Twentieth Respondent	4 Cowslip Street Violet Town Pty Ltd ACN 639 872 352
Twenty-First Respondent	55 Nolan Street Maryborough Pty Ltd ACN 641 392 912
Twenty-Second Respondent	89 Betka Road Mallacoota Pty Ltd ACN 641 393 179
Twenty-Third Respondent	9 Gregory Street Ouyen Pty Ltd ACN 641 392 707
Twenty-Fourth Respondent	9 Main Street Derrinallum Pty Ltd ACN 639 872 736
Twenty-Fifth Respondent	286 Carlisle Street Pty Limited ACN 610 042 343
Twenty-Sixth Respondent	275 High Street Golden Square Pty Ltd ACN 639 870 545
Twenty-Seventh Respondent	Mazcon Investments Hellas IKE
Twenty-Eighth Respondent	Palante Pty Ltd ACN 135 344 151
Twenty-Ninth Respondent	Anastasios Giamouridis
Thirtieth Respondent	The Forum Group of Companies Pty Ltd (in liquidation) ACN 151 964 626
Thirty-First Respondent	Iugis Pty Ltd (in liquidation) ACN 632 882 243
Thirty-Second Respondent	Iugis (UK) Limited
Thirty-Third Respondent	Iugis Holdings Limited
Thirty-Fourth Respondent	Iugis Global Financial Services Limited
Thirty-Fifth Respondent	Iugis Finance Limited
Thirty-Sixth Respondent	Spartan Consulting Group Pty Ltd (in liquidation) ACN 168 989 544
Thirty-Seventh Respondent	Intrashield Pty Ltd (in liquidation) ACN 133 426 534
Thirty-Eighth Respondent	Tesoriero Investment Group Pty Ltd ACN 161 088 115
Thirty-Ninth Respondent	Mangusta (Vic) Pty Ltd ACN 631 520 682
Fortieth Respondent	193 Carlisle Street Enterprises Pty Ltd ACN 612 615 237
Forty-First Respondent	8-12 Natalia Ave Oakleigh Pty Ltd ACN 643 838 626
Forty-Second Respondent	Iugis Hellas IKE
Forty-Third Respondent	Iugis Energy SA
Forty-Fourth Respondent	Eric Constantinidis
Forty-Fifth Respondent	Giovanni (John) Tesoriero
Forty-Sixth Respondent	Moussa (Tony) Bouchahine
Forty-Seventh Respondent	Louisa Maria Agostino
Forty-Eighth Respondent	D&D Group O.E
Forty-Ninth Respondent	Aromatika Fyta Tsai Olympou Theion Ike

Signed: Taken by: 

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Signed:



Taken by:

N. Gardner

ME_188959234_9

NOTICE OF FILING

This document was lodged electronically in the FEDERAL COURT OF AUSTRALIA (FCA) on 4/02/2022 5:39:46 PM AEDT and has been accepted for filing under the Court's Rules. Details of filing follow and important additional information about these are set out below.

Details of Filing

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)
File Number: NSD616/2021
File Title: WESTPAC BANKING CORPORATION ABN 33 007 457 141 & ANOR v
FORUM FINANCE PTY LIMITED (IN LIQUIDATION) ACN 153 301 172
& ORS
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF
AUSTRALIA



A handwritten signature in blue ink that reads 'Sia Lagos'.

Dated: 4/02/2022 5:46:00 PM AEDT

Registrar

Important Information

As required by the Court's Rules, this Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date and time of lodgment also shown above are the date and time that the document was received by the Court. Under the Court's Rules the date of filing of the document is the day it was lodged (if that is a business day for the Registry which accepts it and the document was received by 4.30 pm local time at that Registry) or otherwise the next working day for that Registry.