

ENFORCEABLE UNDERTAKING

Liquor Act 2019
Section 159(3)

The commitments in this undertaking are offered to the Director of Liquor Licensing by:

Nicolaos Kambourakis
As director for and on behalf of
Savannah Way Operations Pty Ltd (ACN 692 884 236)
330 Robinson Road, Borroloola NT 0854

BACKGROUND:

1. The Liquor Commission (the Commission) is charged with various functions under the *Liquor Act 2019* (the Act), including the function of granting a transfer of a liquor licence to appropriate applicants.
2. The Commission has delegated the granting of a transfer of a liquor licence to appropriate applicants to the Director of Liquor Licensing (the Director), who is also charged with conducting an investigation into an application as the Director considers appropriate.
3. Radovic Investments Pty Ltd (ACN 009 619 872) as Owner of the premises known as the Savannah Way Motel, 182 Robinson Road, Borroloola holds liquor licence 80518107/FLL for the premises.
4. By application dated 12 February 2026, Savannah Way Operations Pty Ltd (ACN 692 884 236) applied to the Director for the transfer of liquor licence 80518107/FLL from the current licensee Radovic Investments Pty Ltd for the premises known as the Savannah Way Motel, 182 Robinson road, Borroloola.
5. There are 100 ordinary shares for Savannah Way Operations Pty Ltd (ACN 692 884 236), 49 of which are held in a non-beneficial capacity by DCT (NT) Pty Ltd (ACN 108 527 822), the remaining 51 are beneficial held by Mawurli and Wirriwngkuma Aboriginal Corporation (ORIC 136 840 876).
6. With reference to section 55(1)(e) of the Act, the directors must be disclosed and may be subject to probity examination for fitness to be an associate of the licensee company.

7. For reasons accepted by the Director of Liquor Licensing, the following 12 directors of the Mawuyrli and Wirriwangkuma Aboriginal Corporation will not undergo the ordinary probity examinations expected of an associate as described in section 55(1)(e) of the Act:
 - Jacinta Pluto
 - Revonna Riley
 - Keith Rory
 - Kurtly James Harvey
 - Timothy Lansen
 - Eric Mulholland
 - Elizabeth Gillett
 - Adrienne Friday
 - Benjamin McDinny
 - Adrienne Mary Raggett
 - David Harvey
 - Daphne Ahwon

8. All other directors will be subject to the usual probity examinations.

THE DIRECTOR'S CONCERNS

9. In assessing the application for the grant of the transfer of the liquor licence, the Act requires the decision maker to be satisfied the applicant and their associates are fit and proper persons, necessitating an examination of the executive officers of the corporation.

10. As directors of Mawuyrli and Wirriwangkuma Aboriginal Corporation, those persons listed in Clause 7 are associates of the applicant and equally subject to an examination of the executive officers of that corporation.

11. Current circumstances do not reasonably allow for an examination of their suitability and the Director is aware of the circumstances and takes no issue with it.

12. It is also noted they are unlikely to take an active role in the conduct of the business.

13. The likelihood of their daily involvement in the conduct of the business of the licence notwithstanding, the Act requires the decision maker to be satisfied as associates of the applicant, they are fit and proper persons.

14. As no probity materials have been provided for the 12 named directors, no such determination may be made.

15. Accordingly, the grant of the transfer of the liquor licence Savannah Way Operations Pty Ltd (ACN 692 884 236), If approved by the Director is to be subject to a pre-condition, offered in advance by the applicant, that the applicant enter into an enforceable undertaking, pursuant to section 159(3) of the Act to the effect that the following 12 directors of Mawuyrli and Wirriwangkuma Aboriginal Corporation are restricted as to their involvement with the day to day operation and management of the business conducted under the liquor licence:

- Jacinta Pluto
- Revonna Riley
- Keith Rory
- Kurtly James Harvey
- Timothy Lansen
- Eric Mulholland
- Elizabeth Gillett
- Adrienne Friday
- Benjamin McDinny
- Adrienne Mary Raggett
- David Harvey
- Daphne Ahwon

ACKNOWLEDGEMENT OF CONCERNS

16. Savannah Way Operations Pty Ltd acknowledges the Director's concerns and believes that they are reasonably held.

UNDERTAKING:

17. Under section 159(3) of the Act, Li Wunungu Pty Ltd has offered, and the Director has agreed to accept, as an alternative to the examination of the directors named in Clause 15, the undertaking set out in this Enforceable Undertaking.

18. Li Wunungu Pty Ltd undertakes the following persons:

- Jacinta Pluto
- Revonna Riley
- Keith Rory
- Kurtly James Harvey
- Timothy Lansen
- Eric Mulholland
- Elizabeth Gillett
- Adrienne Friday
- Benjamin McDinny
- Adrienne Mary Raggett
- David Harvey
- Daphne Ahwon

in their role as an associate of Savannah Way Operations Pty Ltd will have no involvement whatsoever with the day to day management or operations of the Savannah Way Motel and the liquor licence, 80518107/FLL, for those premises.

19. Savannah Way Operations Pty Ltd also undertakes those persons named in Clause 18 will not be authorised to give any instruction or direction to the Nominee (Manager), or any other staff member or agent of the licensee if transferred to Savannah Way Operations Pty Ltd.

NON-COMPLIANCE

20. Should the Director believe that any party has failed to materially comply with the Enforceable Undertaking she will write to the parties setting out the concerns regarding non-compliance.
21. The parties will have 14 days from the date of the Director's letter referred to in clause 20 to provide evidence satisfactory to the Director that it has remedied such non-compliance.
22. The provisions relating to remediation notwithstanding, the Commission and the Director reserve the right to take disciplinary action against the licensee in accordance with the Act for any non-compliance with this undertaking.

ACKNOWLEDGEMENTS

23. The parties acknowledge that the Director, in accordance with section 159(6) of the Act, will record this Enforceable Undertaking in the Register of Enforceable Undertakings.
24. The parties also acknowledge, in accordance with section 159(7) of the Act that it may vary or withdraw this Enforceable Undertaking only with the consent of the Director.

COMMENCEMENT DATE:

25. This Enforceable Undertaking will commence operative force from the date it is accepted by the Director.

PROVISION OF DOCUMENTS:

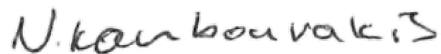
26. The address for providing the Director with any document or notice is:

The Director of Liquor of Licensing
GPO Box 1154
DARWIN NT 0801

The addresses for providing Savannah Way Operations Pty Ltd with any document or notice is:

Savannah Way Operations Pty Ltd
C/- BDO (NT)
72 Cavenagh Street
DARWIN CITY NT 0800

SIGNED BY:



Nicolaos Kambourakis, as Nominee and for the Directors of
Savannah Way Operations Pty Ltd ACN 692 884 236
Dated this 16 day of February 2026.

Accepted by the Director of Liquor Licensing under section 159(5) of the
Liquor Act 2019.



Melissa Garde
Director of Liquor Licensing

Dated this 18 day of February 2026.