

HDI GLOBAL SPECIALTY SE - AUSTRALIA FAMILY VIOLENCE & SUPPORTING VULNERABLE CUSTOMERS POLICY

1. PURPOSE

This Family Violence & Supporting Vulnerable Customers Policy (Policy) has been developed to comply with The Insurance Council of Australia's (ICA) General Insurance Code of Practice (the Code) and sets out how HDI Global Specialty SE - Australia ("HGS") identifies and supports vulnerable Customers, including those affected by Financial Hardship and Family Violence.

For the purposes of this Policy, any reference to "Customers" includes customers of HGS as well as any other individual entitled to Financial Hardship support under the Code. This could include individuals who we are seeking to recover money from as we believe they have caused damage to an insured Customer.

This Policy forms part of HGS Compliance Management System which represents the entire suite of policies and procedures that fulfil HGS legal and regulatory requirements as an Australian organisation providing General Insurance products.

HGS is committed to exercising greater care when dealing with vulnerable Customers. A person may be vulnerable due to a range of factors, including:

- a) age;
- b) disability;
- c) mental health conditions;
- d) physical health conditions;
- e) family violence;
- f) language barriers;
- g) literacy barriers;
- h) cultural background;
- i) Aboriginal or Torres Strait Islander status;
- j) remote location; or
- k) financial distress.

2. POLICY STATEMENT

HGS has a long-standing commitment to conducting its business with honesty and integrity and remains committed to informing Customers, employees, distributors and service suppliers about information and assistance available to vulnerable people, including those experiencing Financial Hardship and Family Violence.

This policy and HGS internal policies and training programs assist employees to:

1. understand if a Customer may be vulnerable;
2. determine how best, and to what extent, they can support a vulnerable Customer;
3. take account of a Customer's particular needs or vulnerability; and
4. engage with a vulnerable Customer with sensitivity, dignity, respect and compassion. This may include arranging additional support and referring the Customer to specialised people or services.

3. FAMILY VIOLENCE

In Australian law, 'Family Violence' is defined as:

“violent, threatening or other behaviour by a person that coerces or controls a member of the person’s family or causes the family member to be fearful.”

Family Law Act 1975 (Cth), section 4AB.

Family Violence means much more than physical violence. It includes:

- emotional abuse, psychological abuse, sexual abuse, financial or economic abuse; and
- damage to property.

The way employees deal with Customers who may be affected by Family Violence should facilitate, rather than act as a barrier to identifying Family Violence and improve the experience of those affected by Family Violence.

The aim of the Policy is to ensure that whenever Family Violence is identified or suspected, the safety of the Customer affected by Family Violence and their family is protected.

HGS recognises that Family Violence is unacceptable in any relationship and Customers experiencing Family Violence will be treated with dignity and respect.

The support of Customers experiencing Family Violence and their family is the highest priority. Customers who indicate or disclose Family Violence are able to access support from HGS that is appropriate to their circumstances.

4. ASSISTING CUSTOMERS

HGS can assist vulnerable Customers, including those experiencing Financial Hardship or Family Violence by:

- ensuring safe and confidential communication in light of individual circumstances;
- helping to set up new insurance policies;
- helping to arrange access to financial hardship support; and
- referral to specialist support services.

These assistance measures may be expanded and varied depending on what our security partners have established.

In circumstances where the issue is complex or unable to be dealt with by the primary person who took the call, it is to be immediately referred to the Head of Risk and Compliance for consideration.

The Customer must be informed of this action.

5. INTERPRETERS

If a Customer informs HGS of their need for an interpreter, or we identify such a need, we will direct the Customer to the relevant section of the insurer’s website.

6. IDENTIFICATION

If a Customer requires support to meet identification requirements, HGS will take reasonable measures to provide such support.

7. FINANCIAL HARDSHIP

Financial Hardship occurs when Customers experience difficulty in meeting their financial obligations to HGS or our business partners.

The support HGS can offer does not include support with paying the premiums under an insurance policy we have issued.

If a Customer informs, or we identify, that they are experiencing Financial Hardship, we will provide them with:

- a copy of our Financial Hardship Application Form; and
- if appropriate, contact details for the National Debt Helpline - 1800 007 007.

7.1 Assessing Requests for Financial Hardship Support

When assessing requests for Financial Hardship support, HGS will consider all reasonable evidence, including:

- evidence of serious illness that prevents the Customer from earning an income;
- evidence of a disability, including a disability caused by mental illness;
- Centrelink statements; and
- evidence of unemployment.

If requires additional information after receiving the application, we will inform the Customer of the information required as soon as possible. The Customer will have 21 Calendar Days from the day of the request to provide the additional information unless an alternative timeframe has been agreed.

7.2 Putting Recovery on Hold

If HGS is taking action to recover an amount from a Customer, the action will be put on hold if we identify the Customer is experiencing Financial Hardship or if the Customer requests Financial Hardship support in relation to that amount.

When putting the action on hold, HGS will contact any collection agent or lawyer we have appointed and inform them the action is on hold. The action will remain on hold until we have assessed the Financial Hardship application and notified the Customer of the decision.

7.3 Making our Decision

HGS will inform the Customer in writing of our decision about whether to give Financial Hardship support within 21 Calendar Days of receiving the application, unless we have requested additional information.

7.4 Customers Entitled to Financial Hardship Support

If HGS determines a Customer is entitled to Financial Hardship support, we will work with the Customer to implement an arrangement that could include any one or more of the following:

- delaying the date on which payment must be made;
- paying in instalments;
- paying a reduced lump sum amount;

- delaying one or more instalment payments;
- deducting the excess from the claim amount paid.

7.5 Customers Not Entitled to Financial Hardship Support

If HGS determines a Customer is not entitled to Financial Hardship support, we will inform them of the reasons for the decision and about our Complaints process.

8. PROTECTING PERSONAL INFORMATION

At all times and in accordance with Privacy laws and HGS Privacy policies, we will ensure the secure and confidential handling of private, confidential, and personal information about vulnerable Customers, including those affected by Family Violence, in order to protect their safety. This will enable Customers to have confidence that such information is secure and not at risk of deliberate or inadvertent disclosure.

The Code requires HGS to protect the right to privacy of vulnerable Customers who have notified us of their need for additional support from someone else. For example, a lawyer, consumer representative, interpreter or friend.

9. TRAINING

Training is tailored to all employee roles within the business and the degree of contact they have with Customers.

HGS will aim to ensure that all employees and third-party providers have been trained and receive ongoing training so that they:

- are aware of HGS policies and procedures when they are engaging with vulnerable Customers;
- identify vulnerable Customers, including those affected by Family Violence;
- deal appropriately and sensitively with vulnerable Customers; and
- apply the Family Violence & Supporting Vulnerable Customers policy and related policies and procedures relevant to their role in dealing with Customers.

Training is aimed at assisting employees to reduce the impact of vulnerability and Family Violence on Customers.

9.1 Service Suppliers

HGS will ensure that service suppliers who deal directly with Customers, such as claims handlers, agents, loss assessors, investigators and claims management services are trained to the same level as our employees.

10. REPORTING

Any notification of Vulnerability or Financial Hardship received by a member of staff must be reported via the Financial Hardship Application Form.

11. SUPPORT SERVICES AND RESOURCES

Agency	Phone	Website	Services available
1800 RESPECT	1800 737 732	http://www.1800respect.org.au	National 24-hour Domestic & Family Violence and Sexual Assault Line.
Beyond Blue	1300 224 636	https://www.beyondblue.org.au/	24/7 support to people experiencing anxiety or depression.
Lifeline	13 11 14	https://www.lifeline.org.au	24/7 counselling & referral service for people in a crisis situation.
MENSLINE	1300 789 978	https://mensline.org.au/	24/7 support, information and referral service for men with family and relationship issues.
National Association of Community Legal Centres		https://clcs.org.au/	An independent not-for-profit community organisation that provides legal and related services to the public, focusing on the disadvantaged and people with special needs.
National Debt Hotline	1800 007 007	https://ndh.org.au/	Financial counselling is a free, confidential service to assist people in financial difficulty.