



## Customer Vulnerability Policy

## CUSTOMER VULNERABILITY POLICY

### SUPPORTING CUSTOMERS EXPERIENCING VULNERABILITY

The following is Future Insurance Group International Pty Ltd (FiGi Life) (ABN 68 619 183 149, AFSL 506558) policy for supporting customers experiencing vulnerability. FiGi Life have adopted 2020 General Insurance Code of Practice provision in Part 9: Supporting customers experiencing vulnerability, with:

- Internal policies and training
- Support measures
- Identification
- Using interpreters
- Mental health

Whilst it is noted that part 9 of the code only applies to Retail Insurance products only, FiGi Life have adopted the policy for all Customers:

We are committed to taking extra care with customers who experience vulnerability. We recognise that a person's vulnerabilities can give rise to unique needs, and that their needs can change over time and in response to particular situations.

A person's vulnerability may be due to a range of factors such as:

1. age;
2. disability;
3. mental health conditions;
4. physical health conditions;
5. family violence;
6. language barriers;
7. literacy barriers;
8. cultural background;
9. Aboriginal or Torres Strait Islander status;
10. remote location; or
11. financial distress.

We encourage our customers to tell us about their vulnerability so that we can work with them to arrange support – otherwise, there is a risk that we may not find out about it.

If a customer is experiencing Vulnerability due to Financial Hardship, we address this separately under our Financial Hardship Policy.

### INTERNAL POLICIES AND TRAINING

FiGi Life has arranged for all staff to undertake the General Insurance Code of Practice annual online training with Australian and New Zealand Institute of Insurance and Finance (ANZIIF). The external training combined with our internal policies and training are appropriate to our employees' roles to help them:

1. understand if a customer may be vulnerable;
2. decide about how best, and to what extent, we can support the customer;
3. take account of the customers' particular needs or vulnerability; and
4. engage with the customer with sensitivity, dignity, respect and compassion – this may include arranging additional support, for example referring the customer to people, or services, with specialist training and experience.

## SUPPORT MEASURES

If our customer tells us, or we identify, that due to a vulnerability that the customer needs additional support or assistance, we will work with the customer and try to find a suitable, sensitive and compassionate way for us to proceed. We will do this as early as practicable, and we will protect the customer's right to privacy.

If our customer tells us, or we identify, that our customer needs additional support from someone else (for example, a lawyer, consumer representative, interpreter or friend), then we will recognise this and allow for it in all reasonable ways. We will try to make sure our processes are flexible enough to recognise the authority of the customer's support person.

Additional support may include making it easier for our customer to communicate with us, referring our customer to a financial counsellor or an appropriate community support service.

## IDENTIFICATION.

If our customer needs support to meet identification requirements, then we will take reasonable measures to support the customer – particularly if the customer is from an Aboriginal or Torres Strait Islander community or a non-English speaking background. Our approach to supporting the customer with verification and identification will be flexible.

## USING INTERPRETERS

Where practicable, we will provide access to an interpreter if the customer asks us to, or if we need an interpreter to communicate effectively with the customer. We will record if an interpreter is used or if there are reasons we are unable to arrange one.

FiGi Life will arrange relevant training for our employees who are likely to be involved in communications requiring an interpreter.

On our website there will be an easy-to find link to:

1. information on interpreting services;
2. teletypewriter services (TTYs);
3. any information on our products that we have translated into other languages; and
4. any other relevant information for people with language barriers.

## MENTAL HEALTH

When developing our internal processes and procedures we considered those who have a past or current mental health condition by doing the following:

1. at a minimum, we will design and sell our products and apply their terms in compliance with the requirements of the Disability Discrimination Act 1992 and/or any relevant State or Territory anti-discrimination requirements;
2. we will treat people with any past or current mental health condition fairly;
3. we will only ask relevant questions when deciding whether to provide cover for a pre-existing mental health condition;
4. if we cannot provide the customer with cover for that condition we will tell the customer about their right to ask us for the information relied on when assessing their application. If they ask for that information, then we will give it to you as set out in part 12 of the Code