



Fidelity Life Assurance Company Limited

Vulnerable Customers Framework

Fidelity Life's Vulnerable Customers Framework

Why have a vulnerable customers framework?

It is important that all customers have access to appropriate insurance products, services and support and that our products and services are also suitable and easily accessible.

At Fidelity Life, we recognise that customers can experience vulnerability at any time and can find themselves in situations that make them vulnerable. If people are vulnerable, they are less able than other people to:

- cope with and recover from stresses or pressures;
- make suitable decisions; or
- represent their own interests.

It is important that these customers can get the support that they need as there is a higher possibility of them suffering harm.

We want to ensure that our customers feel comfortable telling us if they are experiencing vulnerability of some form and that they feel confident that they will be treated with sensitivity, respect and compassion.

Purpose

At Fidelity Life, we are committed to providing appropriate support to vulnerable and potentially vulnerable customers. This forms part of our wider commitment to deliver an outstanding service by focussing on operational excellence and delivering good outcomes for our customers. This framework helps us achieve the following outcomes:

- ensuring vulnerable or potentially vulnerable customers are treated with sensitivity, respect and compassion;
- focussing on a customer centric culture;
- generating customer advocacy;
- supporting our company values of 'doing the right thing'; and
- empowering our people to 'make a difference.'

Scope

This framework applies to Fidelity Life and its people (including permanent staff and contractors).

This policy does not deal with bullying/harassment in the workplace. This is covered by Fidelity Life's Workplace Bullying and Harassment Policy.

The framework

Fidelity Life's vulnerability framework, policy and procedures is designed to be flexible and respond to customer's needs on a case-by-case basis. It applies across all business areas. To help us achieve the outcomes above we have put in place a clear framework made of the following parts:

Fidelity Life's Vulnerable Customer Policy:

- defines vulnerability;
- helps with how to identify vulnerable or potentially vulnerable customers, including signs;
- explains the consequences of vulnerability;
- provides some practical guidance in dealing with vulnerable or potentially vulnerable customers.

Fidelity Life's Vulnerability Indicators:

- Gives examples of some the indicators of vulnerability.

Fidelity Life's Customer Journey:

- Sets out our customer touch points.

Operational processes/procedures:

- Relevant customer and business processes and procedures.

Training:

- Training to embed appropriate behaviour across the business.

Oversight:

- Monitoring and reporting procedures to ensure we are achieving relevant outcomes.

Supporting documents

In defining this framework, we have considered the following available information:

- Findings from the Australian Royal Commission into misconduct in the Banking, Superannuation and Financial Services industry about vulnerable customers
- Findings from the FMA and RBNZ review of conduct and culture in New Zealand life insurers in relation to vulnerable customers
- Human Rights Commission: best practice guidelines for the prioritisation of vulnerable customers
- Guidance from overseas jurisdictions
- FSC Code of Conduct
- IFSO Consumer Vulnerability – key learnings and opportunities, webinar 2019.
- Fidelity Life's Cultures at Work Programme

Appendix 1

Fidelity Life's Vulnerability Indicators

The following are some of the indicators of vulnerability - it is important to remember that there can be others.

People self-identify their vulnerability

- Either directly or through their financial adviser

Inherent vulnerability

- By making a claim

Health or disability situation

- Mental illness
- Diagnosis of a serious illness or disability
- Serious physical health condition

Living situation

- Lives alone
- Cares and lives with someone's who has a serious health or disability conditions
- Lives with and supports several family members or extended family

Family situation

- Cares for and lives with someone who has serious health or disability conditions
- Domestic issues/abuse/violence/restraining orders
- Dealing with separation or divorce
- Single parent
- Primary carer for someone

Financial situation

- Financial loss
- Severe financial hardship
- Loss of employment/redundancy
- Any other financial circumstance causing significant detriment.

Age

- Aged 75 or over
- Aged 65 or over and living alone, without any family support

- Experiencing issues related to old age

Cultural Differences

- Language barriers
- People who can't speak English
- Can't locate previous medical records from other countries
- Different cultural expectations

Geographic and environmental situation

- Geographically isolated
- Impacted by acts of nature (such as earthquakes)

Comprehension

- Low financial understanding
- Limited mental capacity
- Inability to understand insurance policies and processes
- Learning difficulties

Personal circumstances

- Enduring times of stress or anxiety
- Bereavement
- Family breakdown or illness
- Loss of employment/ redundancy
- Financial loss
- Influence of alcohol or drugs
- Any other personal circumstance causing significant detriment