

GENERAL INSURANCE VULNERABILITY POLICY

Introduction

Lloyd's Australia is a signatory to the General Insurance Code of Practice. Pacific Underwriting Corporation Pty Limited (Pacific Underwriting) is a Lloyd's Coverholder and is therefore aligned to Lloyd's adoption of the General Insurance Code of Practice.

This policy has been created to support customers experiencing vulnerability. It is in addition to our policy for support of Family / Domestic Violence affected customers and customers experiencing financial hardship (which are published on the Pacific Underwriting website).

Whilst it is noted that part 9 of the code only applies to Retail Insurance products only, we have adopted the 2020 General Insurance Code of Practice provisions in *'Part 9: Supporting customers experiencing vulnerability'* for all customers, with such measures as:

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

We are committed to taking extra care with customers who experience vulnerability. We recognise that a person's vulnerabilities can give rise to diverse and 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:

- age;
- disability;
- mental health conditions;
- physical health conditions;
- family violence;
- language barriers;
- literacy barriers;
- cultural background;
- Aboriginal or Torres Strait Islander status;
- remote location; or
- 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 which is also published on the Pacific Underwriting website.

Internal policies and training

A separate and publicly available policy about how we will support Customers if they are affected by Family / Domestic Violence is published on the Pacific Underwriting website.

All Pacific Underwriting staff have undertaken the General Insurance Code of Practice annual online training with Australian and New Zealand Institute of Insurance and Finance (ANZIIF) and are required to complete refresher training on an ongoing basis. The external training combined with our internal policies and training are appropriate to our Employees' roles to help them:

- understand if a customer may be vulnerable;
- decide about how best, and to what extent, we can support the customer;
- take account of the customers' particular needs or vulnerability; and
- 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 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.

In particular, if a customer is unable to provide conventional forms of ID we will follow the guidance published by AUSTRAC and identification of eligible insureds will be attempted by utilising alternative identification methods such a declaration by a club official at the customer's sporting club or a letter from an employer on the employer's business letterhead.

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.

Pacific Underwriting 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:

- **Interpreting Services**

The Translating and Interpreting Service (TIS National) is an interpreting service provided by the Australian Government Department of Home Affairs for people who do not speak English and for agencies and businesses that need to communicate with their non-English speaking clients.

TIS National (Australian Government Department of Home Affairs)

<https://www.tisnational.gov.au/en/Help-using-TIS-National-services/Contact-TIS-National>

- **Teletypewriter services**

National Relay Service (Australian Government Department of Infrastructure, Transport, Regional Developments and Communications)

<https://www.communications.gov.au/what-we-do/phone/services-people-disability/accesshub/national-relay-service>

- Any information on our products that we have translated into other languages; and
- Any other relevant information for people with language barriers.

Mental health

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

- at a minimum, 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;
- treat people with any past or current mental health condition fairly;
- only ask relevant questions when deciding whether to provide cover for a pre-existing mental health condition;
- 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 the customer as set out in part 12 of the Code.

We will also offer support measures as detailed in the policy to individuals who are claimants under any policy of insurance issued by us where we identify them as experiencing vulnerability due to past and/or current mental health conditions.