



Vulnerable Clients Policy

Version 1.1

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This Vulnerable Clients Policy is
issued by Quanta Insurance Group Pty Ltd
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ABOUT THIS POLICY

- ▶ This Vulnerable Client Policy (the **Policy**) applies to Quanta Insurance Group Pty Ltd (ABN 29 118 886 927) (AFSL: 302520) (**Quanta, Company**).

This policy manages how employees should handle dealings with Vulnerable Clients.

This Policy applies to all the Quanta employees and consultants.

This Policy has the full support of the board and senior management of the Company and is seen as a key component of ensuring the long-term success and viability of the Company.

If any employee chooses not to follow this Policy, that employee will be in breach of the Quanta's Code of Conduct and the term of their employment agreement. This may result in grounds for termination of employment or the need for further disciplinary action to occur.

INTRODUCTION

- ▶ The Company are committed to supporting clients who may be experiencing vulnerability. This Policy aims to provide guidance on Quanta's position towards Vulnerable Clients, through educating employees and stakeholders on identifying and supporting Vulnerable Clients.

IDENTIFYING VULNERABLE CLIENTS

Vulnerable Clients are clients who, as a result of socio-demographic characteristics, behavioural characteristics, personal situations, or market environment, are especially susceptible to loss or harm (a **Vulnerable Client**).

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

- Age;
- Disability;
- Mental health conditions;
- Physical health conditions;
- Family and domestic violence

- Language and/or literacy barriers;
- Cultural background;
- Aboriginal or Torres Strait Islander status;
- Remote location;
- Technology capability
- Financial distress; or
- Other personal or financial circumstances causing significant detriment.

Quanta will do their best to identify any vulnerability. We encourage clients and potential clients to communicate with us and advise if they are experiencing vulnerability.

SUPPORTING VULNERABLE CLIENTS

Quanta will endeavour to make sure our processes are flexible enough to recognise the authority of a support person.

Quanta will have internal policies and training appropriate to our employee's roles to help them:

- Understand support options available to Vulnerable Clients and to what extent we can provide support;
- Take account of a client's particular needs or vulnerability; and
- Engage a client or potential client with sensitivity, dignity, respect and compassion – this may include arranging additional support, by referring a vulnerable person to people or services with specialist training and experience.

DOMESTIC VIOLENCE

Domestic violence is a prevalent and complex issue that is present throughout our communities. Quanta is committed to supporting people affected by domestic violence and treating them with the utmost dignity and respect.

We recognise that domestic violence means more than physical violence. It includes

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

Quanta's priority is to ensure that whenever domestic violence is identified or suspected, the safety of the customer affected by domestic violence and their family is protected and that we are committed to supporting them.

An example of this in the insurance industry is where a perpetrator of domestic violence is undermining a victim by making changes to insurance arrangements that provide them with more control over the benefits of insurance, which could have serious ramifications for the victim.

Particularly relevant to the insurance industry could be questions about:

- (a) What to do when there are conflicting instructions provided from joint policy holders about cancellation of a policy or payment of a claim;
- (b) The potential for a perpetrator to instruct an employee to make changes to a policy without reference to the victim;
- (c) Disclosing information about a victim to a perpetrator to the detriment of the victim.

OUR EMPLOYEES

Quanta's employees and third-party providers are trained so that they can deal appropriately and sensitively with Vulnerable Clients.

We are committed to training our employees to help them:

- i. Understand if a customer may be vulnerable;
- ii. Take account of a customer's particular needs or vulnerability;
- iii. Determine how best to support a Vulnerable Client; and
- iv. Appropriately engage with a Vulnerable Client with sensitivity, dignity, respect and compassion.

Quanta acknowledges that our employees who regularly engage with Vulnerable Clients, may also require support.

Our employees will be required to complete the latest course recommended by the Compliance Team relating to Vulnerable Clients, on an annual basis.

DEALING WITH A VULNERABLE CLIENT

Quanta have put in place the following protocols when dealing with a Vulnerable Client:

1. If you believe you are dealing with a Vulnerable Client, you should report this to your manager, who in turn should notify the Compliance Team.
2. If your manager approves for you to continue dealing with this client, you should take the time to provide better support to the client through methods such as:
 - a. Allowing extra time to explain advice and answer client questions;
 - b. Providing complex advice over several shorter meetings instead of one lengthy detailed email;
 - c. Meeting clients at their premises or via teleconference;
 - d. Communicating via the National Relay Service ensuring company websites and other client-facing materials meet accessibility requirements;
 - e. Provide access to translation and interpretation services; and
 - f. Allow for an authorised third party (such as a friend or family member) to attend meetings with the client.
3. There may be times where the client requires a level of support that an employee is simply unable to provide. In these circumstances, it is important

employees are aware of appropriate specialist services to which clients can be referred to for assistance. These services are:

This policy will also be subject to a formal review every two years or earlier as required.

Services	Contact Detail
Hearing and Speech impairment	National Relay Service - 1800 555 660
Translating and Interpreting Service	131 450
Emergency Services	000
Mental health	Lifeline – 13 11 14 Beyond Blue – 1300 22 4636
Family violence counselling	1800 737 732
National Debt Helpline	1800 007 007
Legal Aid	1300 888 529
Mob Strong Debt Helpline- free legal advice about money matters for Aboriginal and Torres Strait Islander peoples	1800 808 488
Mensline	Online support service for men with family and relationship concerns 1300 78 99 78

RECORDING INFORMATION

Quanta acknowledges the importance of recording information for documentation purposes. This is to minimise the need for repetitive disclosures from Vulnerable Clients, particularly in situations like domestic violence where obtaining supporting documentation can be difficult.

RESPONSIBILITY & REVIEW

The Legal Counsel in conjunction with the Compliance Committee is responsible for review and updating of the Vulnerable Client Policy.