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Date of Issuance	Date on which this Policy is approved.
VULNERABILITY	Vulnerability refers to a situation or circumstances which impact a customer in such a way that it exposes them to harm, loss or disadvantage.
EAA	Europ Assistance Australia Pty Ltd
Group	The Generali Group whose ultimate parent Company is Assicurazioni Generali S.p.A. EAA forms part of the Generali Group.

1. Glossary and Definitions

Acronym/Term	Explanation/Definition
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FIRST AND FOREMOST: If you are in immediate danger, please contact **000**

2. Introduction

2.1 OBJECTIVES

Europ Assistance Australia Pty Ltd (“EAA”) understands that customers may experience vulnerability, particularly under certain circumstances such as recent bereavement, mental health challenges, accident or illness, domestic violence, financial stress or other factors as set out in this policy. EAA is committed to accommodating the needs and circumstances of its customers and strives to act fairly, conscientiously and with extra care when dealing with customers experiencing vulnerability.

This policy aims to promote a deeper understanding amongst EAA employees and representatives of vulnerabilities that customers may face, enable these employees and representatives to identify when customers are experiencing vulnerabilities and implement processes to effectively deal with and assist these customers in an empathetic and caring manner.

Although EAA will use all efforts to identify when a customer is experiencing vulnerability, it encourages customers to alert them of vulnerability to ensure that the correct support can be provided.

2.2 SCOPE OF APPLICATION

This Policy applies to all EAA employees who deal with customers (i.e. Sales, Claims, Complaints). This policy furthermore contains useful and important information for customers who may be experiencing vulnerability.

- **Age (very old or very young)**
- **Disability**
- **Mental health conditions**
- **Illness**
- **Domestic violence**
- **Language or literacy barriers**
- **Cultural background**
- **Aboriginal or Torres Strait Islander status**
- **Remote location**
- **Financial distress**
- **Experiencing a natural disaster or crisis event**
- **Recent bereavement**

2.3 IMPLEMENTATION, MONITORING AND INFORMATION FLOWS

EAA's Legal & Compliance Manager is responsible for maintaining this policy and for guaranteeing a due information flow on the approval and implementation status. EAA's Senior Management is responsible for ensuring implementation of this policy.

3. What is Vulnerability?

Vulnerability refers to a situation or circumstances which impact a customer in such a way that it exposes them to harm, loss or disadvantage and which may be made worse when a company does not use the appropriate level of care when dealing with such a customer.

Vulnerability may be temporary or ongoing, gradual or sudden and can impact anyone at any time. There is no fixed set of factors which determine vulnerability, however, the below are some examples of circumstances which may cause vulnerability in customers:

Vulnerability affects people in different ways and may reduce a customer's ability to engage with EAA, make informed decisions, consider options and evaluate the information EAA provides. It is therefore vital that EAA employees recognise and promptly respond to vulnerability.

4. Framework for Dealing with Customers Experiencing Vulnerability

Summary of framework	
Recognise	<ul style="list-style-type: none"> • Recognise when a customer may be experiencing vulnerability and whether it is temporary, sporadic or permanent. • Identify the type of vulnerability.

Respond	<ul style="list-style-type: none"> • Ensure the customer's safety and wellbeing and ask if they are ok. • Respond with empathy and active listening and determine what must be done to support the customer.
Refer	<ul style="list-style-type: none"> • Where appropriate refer the customer to external services to ensure their needs are adequately met.

4.1 KEY PRINCIPLES

EAA follows the principles below when dealing with customers experiencing vulnerability:

- a) **Respect & empathy:** EAA will be respectful and compassionate in its engagement with customers who are experiencing vulnerability, ensuring a reasonable standard of care is applied throughout its dealings with the customer.
- b) **Customer-centered approach:** EAA will keep its customers and their situation at the centre of its communication and decision-making process, ensuring fairness, empathy and transparency in all interactions.
- c) **Informed decision-making:** EAA will not judge the circumstances of customers but will support them and do nothing to negatively impact their dignity so that they can make informed decisions in their dealings with EAA.
- d) **Needs-based focus:** EAA will ensure that the needs of customers are proactively addressed and will ensure they are supported and kept informed.

a. Identifying Vulnerability

- b. EAA will train its employees and representatives to identify vulnerability and understand how to deal with customers in these situations.
- c. EAA will encourage customers or their authorised representative (i.e. attorney, family member, interpreter, etc) to tell EAA about their needs in order to work with them and discuss available options.
- d. If a customer discloses, or EAA identifies, that they are experiencing vulnerability, the EAA employee shall record this on the system and flag the records appropriately to ensure that EAA adheres to this policy throughout its entire engagement with the customer. The information must be recorded prominently so that vulnerable customers do not have to repeat themselves if they make contact with EAA again.
- e. This policy, together with the appropriate training, has been developed to help EAA's employees and representatives gain an increased awareness of how to:
 - identify if a customer may be vulnerable;
 - decide how best, and to what extent, EAA can support them;
 - take into account any particular needs or vulnerability; and
 - engage with the customer with sensitivity, dignity, respect and compassion —

this may include arranging additional support, for example referring to people, or services, with specialist training and experience.

- f. EAA has identified the following non-exhaustive list of signs that indicate that a customer may be experiencing vulnerability:
- asking irrelevant and unrelated questions or displaying signs of forgetfulness;
 - unable to read and understand the information they are provided with, and asking for it to be continually repeated;
 - responding in a vague or irrational way to simple questions;
 - taking a long time or displaying difficulty in responding to simple questions or requests for information;
 - wandering off the topic at hand and making irrelevant statements;
 - advising or displaying signs of ill-health, exasperation or discontent;
 - indicating in any way that they are feeling rushed, flustered or experiencing a stressful or difficult situation;
 - having trouble remembering relevant information;
 - expressing thoughts of suicide;
 - hearing verbal abuse or screaming in the background; or
 - any of the factors set out in the Introduction to this policy.

5. Arrangements and Support Measures

- a) **Training:** All of EAA's customer-facing employees and representatives receive training relevant to their roles in order to equip them for dealing with vulnerable customers.
- b) **Extra Care Team:** EAA has an "Extra Care Team" made up of dedicated employees and representatives within its claims, internal dispute resolution, sales and service areas who have specialist skills and knowledge to support customers experiencing vulnerability. The team is committed to showing extra care in its dealings with vulnerable customers and recognise that these customers have unique needs. The team will act as the sole point of contact for a customer experiencing vulnerability to minimise the risk of repeat disclosure and to accommodate a change in the customer's needs over time.
- c) **Confidentiality:** EAA recognises the importance of customer privacy and safety and will therefore strictly adhere to its Data Privacy Policy to ensure that all communications and personal information is handled with the utmost confidentiality and stored securely.
- d) **Interpreters:** EAA will take reasonable measures to provide customers with access to an interpreter where needed or requested by the customer in order to effectively communicate with the customer. This will be recorded on the system.
- e) **Relevant information:** EAA will request only relevant information from a vulnerable customer and will limit repeat disclosure by providing a single contact point or Extra Care Team member. EAA will work with the customer or their representative to simplify the process.
- f) **Early recognition of family violence:** EAA will use its best endeavours to identify possible family violence, in an attempt to mitigate the impact. This is done by identifying possible victims of family violence, or possible offenders as both may be customers, or

potential customers. Early indicators of family violence may be apparent at claim stage or after a major disaster event. EAA has qualified representatives to interact with customers and assist in identifying violence, financial hardship and mental health. Service providers used by EAA must also be trained to recognise possible family violence, and to respond accordingly.

Where a Customer affected by family violence makes an insurance claim, flexibility and care is required during the claims handling process. This is particularly important if the offender is a joint policyholder and/or has caused the claim (for example, through damage to the claimant's property).

g) **Mental & physical health conditions:** EAA will treat customers with any past or current mental health conditions fairly by asking relevant questions when deciding whether to provide cover for a pre-existing mental health condition. Claims involving mental or physical health conditions will be processed sensitively having regard to the customer's ongoing medical treatment needs and using the least intrusive methods of investigation.

Where a Customer makes a claim against an existing policy, the claim will not be denied on the basis of a pre-existing mental health condition where the covered event does not relate to the pre-existing mental health condition.

If EAA relies on the exemption contained in section 46 of the Disability Discrimination Act, 1992 (Cth) or a similar exemption in any relevant legislation, accurate records of the actuarial or statistical data and/or other relevant factors they have relied upon to do so must be retained in line with EAA's Data Retention Policy. EAA will inform customers of their right to ask for the information relied on when assessing their applications.

h) **Referring customers to specialist services:** Customers affected by family violence should be able to quickly access information on the policies they hold and available support. Customers will likely be more comfortable disclosing vulnerability and domestic violence if they are aware of the support EAA has in place, and the existence of organisations offering specialist services. It is important that customers know they will not be penalised for disclosing vulnerability and domestic violence. EAA will therefore:

- prominently publish the assistance and referrals available to Customers affected by vulnerability and domestic violence and how customers may access such assistance on its website;
- provide a copy of this policy to a customer upon request; and
- provide for periodic review of the policy and its associated procedures.

EAA has furthermore published the contact details for external specialist services on its website.

Where a customer is affected by vulnerability or family violence, they may contact EAA directly via ma.service@europ-assistance.com.au

6. Complaints

EAA is committed to handling any concerns or complaints that customers may have in relation to services or any other matter relating to their vulnerable circumstances. EAA encourages customers to lodge their complaints or concerns by contacting the call centre or sending an email to ma.service@europ-assistance.com.au. Any complaints received by EAA's Dispute

Resolution team relating to vulnerability, will be dealt with by the nominated 'Extra Care Team' member in the Dispute Resolution team and will be prioritised for resolution.

If the outcome or support by the Extra Care Team member in the Dispute Resolution team is not satisfactory, this will be reviewed internally by EAA's Complaints Committee ("Committee") in line with EAA's Complaints Management Policy. The 'Extra-Care Team' is responsible for escalating the matter to the Committee. The customer may lodge a complaint with the Australian Financial Complaints Authority ("AFCA") at any time of the process.

7. External Support

EAA Employees are not best placed to provide specific advice on vulnerability outside the scope of insurance or financial matters. They are not professional social workers or experts in identifying vulnerability and customers may not raise that they are experiencing vulnerability. However, where possible, Employees will suggest that a customer contact an external legal and support organisation.

EAA's employees and representatives shall direct vulnerable customers to the relevant external resources and make this information available to customers in communications and on EAA's website. On request from a customer, EAA may also transfer a call or communication to relevant external sources to provide additional support. If customers are experiencing vulnerability or domestic violence, they should be provided with the contact details below (as relevant):

In an emergency or if customer is not feeling safe, call 000.

1800RESPECT

1800 737 732

24-hour helpline for anyone who is at risk of domestic and family violence and sexual assault.

Lifeline

13 11 14

24-hour crisis support and suicide prevention services.

Aboriginal Family Domestic Violence

1800 019 123

A dedicated line for Aboriginal victims of crime who would like information on victims' rights and how to access counselling and financial assistance.

Relationships Australia

1300 364 277

Community-based not-for-profit organisation providing support groups and counselling on relationships.

Ageing and Disability Abuse Helpline **1800 628 221**

A helpline for abuse, neglect and exploitation of older people and adults with disability.

National Debt Hotline **1800 007 007**

Free financial advice and counselling services on how to get your finances back on track during a difficult time.

Kids Helpline **1800 551 800**

Free private and confidential counselling services for young people aged 5 and 25.

Mensline Australia **1300 789 978**

Free telephone and online support, information and referrals for men with family and relationship concerns.

QLife **1800 184 527**

Free and anonymous counselling services and LGBTI relationship support.

8. Financial Hardship as a Result of Vulnerability

EAA recognises that family violence is a potential cause of payment difficulties and such customers may therefore be eligible for access to Financial Hardship assistance. EAA will work with a vulnerable customer who requests assistance and discuss options for relieving their Financial Hardship. When a customer self-identifies as being affected by family violence and what their financial situation is, EAA shall determine whether they are experiencing financial hardship.

Where EAA becomes aware that a customer's debt involves family violence circumstances, the debt will not be referred to or sold onto third-party debt collection agencies. Where a debt has been referred to or sold to a third-party collection agency and EAA becomes aware that this debt involved family violence circumstances, EAA will work with the collections agency to provide the best outcome for the customer. This may include repurchasing an existing debt or taking back a referred debt from the collection agency. This will be assessed on a case by case basis. EAA will consider the risks involved in attempting to recover from a family violence offender. This may put the collection agent in danger and may also result in further violence towards the victim.

9. Training and Awareness

EAA is committed to promoting the principles under this policy and in meeting customer expectations as well as attending to the highest level of industry standards. EAA has therefore developed the following ongoing training requirements to promote the understanding of the policy, and continued professional development of our team, with additional focus for EAA's "Extra Care" Team:

- All employees receive Internal Code of Practice, Vulnerability and Financial Hardship Technical Training on joining and annually thereafter.
- All members of the 'Extra Care' team receives external and internal Training on the General Insurance Code of Practice, Vulnerability and Financial Hardship on joining the team and as an annual refresher thereafter. This training may include soft-skills.
- Awareness of this policy will be promoted by prominently publishing the policy and relevant information around vulnerability as well as the options available to customers on EAA's website. This will include contact details of external specialist services.

10. Roles and Responsibilities

Role	Responsibilities
Board of Directors	<ul style="list-style-type: none"> • The Board shall ensure that this policy is effectively implemented
Compliance & Risk Committee and the Complaints Committee	<ul style="list-style-type: none"> • Make amendments and approve changes to the policy when required as determined by the Committee or the Board. • Provide recommendations for changes according to Complaints trends or regulatory changes. • Supervise and follow up on remediation to conflicts occurring in respect of this policy.
COO	<ul style="list-style-type: none"> • Responsible for ongoing maintenance of this policy. • Propose any changes or updates to the policy to the relevant Committee.
'Extra Care Team' and Customer Representative	<ul style="list-style-type: none"> • Follow this policy to support customers who are experiencing vulnerability, and to respond and refer them accordingly. • Report a possible or actual breach of this policy to the department Manager or the Compliance & Risk Committee as they become aware of the breach and

	<p>within 48hrs.</p> <ul style="list-style-type: none"> • Undergo mandatory training on the General Insurance Code of Practice and, in particular, supporting customers experiencing vulnerability.
Internal Dispute Resolution team	<ul style="list-style-type: none"> • Follow this policy in dealing with vulnerable clients. • Engage as part of the 'Extra Care Team' when resolving complaints involving vulnerable customers.
Underwriting department	<ul style="list-style-type: none"> • Keep accurate records of the actuarial or statistical data and/or other relevant factors if they have relied on the cover exemption for vulnerable persons contained in section 46 of the DDA or a similar exemption in any relevant legislation.
EAA Employees or Representatives	<ul style="list-style-type: none"> • Follow this policy in all dealings with customers. • Undergo mandatory training on the General Insurance Code of Practice and, in particular, supporting customers experiencing vulnerability. • Report possible or actual breach to this policy to the department Manager or the Compliance & Risk Committee as they become aware of the breach within 48 hrs.
External service providers (in Australia)	<ul style="list-style-type: none"> • Provide EAA with evidence or confirmation of compliance with the GI COP. • Cooperate by providing information to EAA about any customer experiencing vulnerability or the performance of any representative involved in the application of this policy. • Report a possible or actual breach to this policy to the relevant EAA Manager who is their contact point as they become aware of the breach and within 48 hrs.
External service providers (International)	<ul style="list-style-type: none"> • Provide EAA with confirmation of their compliance with this policy as part of the service agreement. • Cooperate by providing information to EAA about any customer experiencing vulnerability or the performance of any representative involved in the application of this policy. • Report a possible or actual breach to this policy to the relevant EAA Manager who is their contact point as

	they become aware of the breach and within 48 hrs.
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11. Data Management & Reporting

EAA's systems are designed to capture and record details of customers experiencing vulnerability and reports are generated in order to monitor vulnerability cases. In addition to the operations team, the Complaints Committee and the Compliance and Risk Committee shall periodically monitor these cases to ensure that controls are effective.

12. Review

This policy shall be reviewed on at least an annual basis by the Compliance & Risk Committee.