

## What are the upcoming Regulatory Change Requirements?

Regulatory changes within the Insurance industry are still ongoing in 2021. The below timeline and information gives you an overview of some of your upcoming Regulatory change requirements:

Compliance Date	Regulation	Key Points
1 July 2021	2020 General Insurance Code of Practice (Code)	<p>Compliance with the full Code is required by 1 July 2021. The full Code will commit Code subscribers to high standards of service and require them to be honest, efficient, fair, transparent and timely in their dealings with their customers and others entitled to the protections provided by these codes.</p> <p>The Hollard Insurance Company is a subscriber to the Code and as a Service Supplier to us, all activities that you perform must also comply with the Code. Some of the key obligations of the Code that need to be adhered to include:</p>
		<p><b>Part 3: Our obligation to you</b></p> <p>Provides an overarching obligation on our Service Suppliers to be honest, efficient, fair, transparent and timely in dealings with customers.</p>
		<p><b>Part 5: Standards for our Service Suppliers</b></p> <p>This Part applies to 'Retail' insurance products only.</p> <p>Key obligations include:</p> <ul style="list-style-type: none"> <li>• When you are supplying a service to a customer on behalf of us, you are to advise the customer that we have authorised you to provide that service and that you are acting on our behalf</li> <li>• Implementation of appropriate processes to:                             <ul style="list-style-type: none"> <li>- manage complaints and Code breaches when acting on behalf of us;</li> <li>- provide timely notification of complaints and Code breaches to us</li> </ul> </li> </ul> <p>For any Code breach you are required to notify Hci as soon as possible but no later than 1 Business Day from the identification of the incident. To log the incident, access the Incident Form via the <a href="http://www.hollardcommercial.com.au/distributors-and-service-suppliers-complaints-and-incidents-reporting">webpage</a> (www.hollardcommercial.com.au/distributors-and-service-suppliers-complaints-and-incidents-reporting) and complete the required fields. Once the incident has been logged, our Risk and Compliance Team will review and manage. If required, they will contact you about next steps.</p>
		<p><b>Part 8: Making a Claim</b></p> <p>This Part applies to 'Retail' insurance products only.</p> <p>Key obligations include:</p> <ul style="list-style-type: none"> <li>• immediately correct mistakes identified or notified in the handling of a claim; and</li> <li>• only request and rely on information and documentation that is relevant to forming a decision on a claim</li> </ul>
		<p><b>Part 9: Supporting Customers Experiencing Vulnerability</b></p> <p>This Part applies to 'Retail' insurance products only.</p> <p>Key obligations include:</p> <ul style="list-style-type: none"> <li>• ensuring all relevant staff are trained appropriately in understanding and dealing with customers experiencing vulnerability;</li> <li>• having the ability to identify a customer experience vulnerability and to flag them as vulnerable at (or during) any point of customer contact with notification to us;</li> <li>• having a system in place to keep customer information private and confidential; and</li> <li>• having processes in place to prevent repeated requests and notification of their vulnerability</li> </ul>



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1 July 2021	2020 General Insurance Code of Practice (Code	<p><b>Part 10: Financial Hardship</b></p> <p>This Part applies to ‘Retail’ and ‘Wholesale’ insurance products. Financial Hardship is a situation on which an individual has difficulty meeting their financial obligations to us. However, it does not apply to the customer’s inability to pay a premium.</p> <p>Key obligations include:</p> <ul style="list-style-type: none"> <li>ensuring all relevant staff are trained appropriately in understanding and dealing with customers experiencing vulnerability; and</li> <li>having the ability to identifying and notifying us of a customer experiencing financial hardship, and engage with them with sensitivity, respect and compassion, and to take appropriate steps for additional support.</li> </ul> <hr/> <p><b>Part 11: Complaints</b></p> <p>This Part applies to ‘Retail’ insurance products and ‘Wholesale’ insurance products where the customer is entitled to Financial Hardship under Part 10 of the Code.</p> <p>When you or your staff are acting for us and a complaint is made, you must log this complaint as soon as possible, but no later than 1 Business Day from the identification of the complaint. You must log the complaint even if you were able to resolve the complaint in the first instance.</p> <p>Our webpage, process and forms for logging a complaint has been enhanced. To log the complaint, access the Complaints Form via the <a href="http://www.hollardcommercial.com.au/distributors-and-service-suppliers-complaints-and-incidents-reporting">webpage</a> (www.hollardcommercial.com.au/distributors-and-service-suppliers-complaints-and-incidents-reporting) and complete the required fields. Once the complaint has been logged and forwarded to us, our Customer Resolution Team will be notified and will assess the information provided. If required, they will contact you about next steps.</p> <p>If you have any issues, please contact our <a href="#">Procurement Team</a>.</p> <p>For further information see the <a href="#">General Insurance Code of Practice 2020</a> and your Service Supplier Agreement.</p>
1 Oct 2021	RG 78 Enhanced Breach Reporting	<p>The reforms to the Breach Reporting regime are applicable to Australian Financial Service Licence (AFSL) holders. Key aspect of the reforms includes the following:</p> <ul style="list-style-type: none"> <li>expanding the kinds of situations that need to be reported by licensees to ASIC;</li> <li>reporting timelines will be set and are consequently shorter;</li> <li>there will be a need to conduct ‘two’ significance tests for assessment of reportable breaches;</li> <li>requiring licensees to lodge breach reports online and in the required format to ASIC; and</li> <li>requiring ASIC to publish data about breach reports on its website.</li> </ul> <p>Examples of breaches that may be significant include:</p> <ul style="list-style-type: none"> <li>failure to maintain professional indemnity (PI) insurance, or an appropriate level of PI insurance cover;</li> <li>previously undetected breaches;</li> <li>representatives give inappropriate advice which results in a major or substantial loss to a client;</li> <li>representatives operating outside the scope of your AFSL authorisations; and</li> <li>fraud in supply of financial services by a representative</li> </ul> <p>For further information see RG 78 Enhanced Breach Reporting.</p>



Compliance Date	Regulation	Key Points
5 October 2021	RG 271 Internal Dispute Resolution	<p>The reforms to the Dispute Resolution regime are applicable to Australian Financial Service Licence (AFSL) holders. Key aspect of the reforms includes the following:</p> <p>RG 271 will replace the existing requirements of RG 165 on 5 October 2021. Key changes include:</p> <ul style="list-style-type: none"><li>• a broader definition of complaints;</li><li>• amendment to the previous definition of small business, extending its application to businesses which might otherwise be considered wholesale clients;</li><li>• reduced maximum timeframes for responding to IDR complaints;</li><li>• minimum requirements for written IDR responses;</li><li>• new resource requirements;</li><li>• guidance on the identification and management of systemic issues, including the role which the Boards and the front-line staff must play in the process; and</li><li>• fostering a pro-active complaint handling culture to work in the consumer's best interest.</li></ul> <p>When you or your staff are acting for us and a complaint is made, you must log this complaint to us as soon as possible, but no later than 1 Business Day from the identification of the complaint. You must log the complaint even if you were able to resolve the complaint in the first instance.</p> <p>Our webpage, process and forms for logging a complaint has been enhanced. To log the complaint, access the Complaints Form via the <a href="http://www.hollardcommercial.com.au/distributors-and-service-suppliers-complaints-and-incidents-reporting">webpage</a> (www.hollardcommercial.com.au/distributors-and-service-suppliers-complaints-and-incidents-reporting) and complete the required fields. Once the complaint has been logged and forwarded to us, our Customer Resolution Team will be notified and will assess the information provided. If required, they will contact you about next steps.</p> <p>If you have any issues, please contact our <a href="#">Procurement Team</a>.</p> <p>For further information see <a href="#">RG 271 Internal Dispute Resolution</a>.</p>

**Important note:** The information in this document is in summary form and has been compiled solely to provide interested parties with general information only. The Information does not purport to contain all the information that an interested party may require, including but not limited to the interested person's own compliance obligations or requirements. You should consider the relevant source document (e.g. GICOP) linked and the terms of your contract with us in conducting your own analysis of the information.