

Vulnerable Customer Policy

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Purpose

The purpose of this policy is to ensure that the operations of Sovereign Insurance Australia or any of its affiliates do not have any negative impact upon vulnerable customers.

For the purposes of this policy, vulnerable customers are customers and prospective customers whose ability or circumstances require us to take extra precautions in the way that we sell and provide our services to ensure that they are not disadvantaged in any way.

What is a vulnerable customer?

A vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a company is not acting with appropriate levels of care.

Vulnerability may be permanent, temporary or situational. This means that while some customers experience long-term vulnerability, others may face vulnerability for shorter periods due to changes in life circumstances such as illness, loss of employment, natural disaster, relationship breakdown, or bereavement.

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

Our commitment is to treat all customers fairly and with empathy, recognising that vulnerability may be permanent, temporary, or situational. We will take appropriate steps to identify and support customers in these circumstances to ensure they are not disadvantaged.

Types of vulnerability

We recognise that vulnerability can take many forms:

Permanent vulnerability – long-term or ongoing conditions such as disability, chronic illness, or reduced capacity.

Temporary vulnerability – short-term circumstances such as hospitalisation, job loss, or recent bereavement that temporarily affect a customer's ability to make decisions or manage their affairs.

Situational vulnerability – vulnerability that arises from specific external events such as a natural disaster, economic hardship, or sudden family crisis.

By acknowledging these types, we ensure our support mechanisms are flexible and responsive to each customer's situation.

Identifying a vulnerable customer

Our staff are trained to identify vulnerable customers so we can take extra steps to assist outside of our standard procedures. However, it is not always possible to recognise these characteristics. Therefore, if you believe you may fit the criteria for a vulnerable customer, please read this policy and notify us immediately of your particular needs.

It is important to note that a person's vulnerability may not be constant. Customers who were previously not vulnerable may become so due to changes in their situation, and vice versa. Our staff are trained to be attentive to changing circumstances and to respond appropriately.

Vulnerability groups

We recognise that certain groups of customers may be vulnerable. Whilst not all customers in these groups may be vulnerable, we will consider a customer's individual circumstances where a potential vulnerability is identified. These groups may include, but are not restricted to:

- Customers with communication difficulties (including learning difficulties and English not being their first language, dyslexia).
- A customer with a reduction in physical or mental capacity.
- Customer with health issues - illness, whether physical or mental illness, severe or long term.
- A sudden diagnosis of serious illness to the customer or close family member.
- Personal circumstances of the customer – factors such as financial difficulties, bereavement, caring responsibilities or redundancy.
- The customer's age particularly older and younger people. For example, a younger person may be considered inexperienced and the older person may be less technologically able.

Our key principles when engaging with a vulnerable customer

As soon we think we may be engaging with a vulnerable customer, whether this is through our identification or you are approaching us, we will:

- Immediately make a record of this and ensure we adhere to this policy.
- Provide additional opportunities for you to ask questions about the information we have provided.
- Continuously seek confirmation that you have understood the information that has been provided.
- Ask if there is anybody with you who is able to assist. If not, and we believe this will be beneficial, we will make arrangements to continue with the subject matter at another time.
- Offer you the opportunity to complete the transaction after a period of further consideration.

If we can't help a customer, we will try and make sure that they understand what alternative options are available to them.

To register as a vulnerable customer

Email: corporate@sovereigninsurance.com.au

Phone: 1800 240 125

Review and Continuous Improvement

We regularly review our approach to identifying and assisting vulnerable customers to ensure it reflects evolving social, economic, and environmental conditions. This includes recognising temporary and situational factors that may affect customers unexpectedly.