

Europ Assistance Australia Financial Hardship Policy

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1. Glossary and Definitions

Acronym/Term	Explanation/Definition
Authorised Agent	A person acting on behalf of a customer and is nominated by the customer to correspond with EAA i.e. lawyer, consumer representative, interpreter, friend, etc.
Customer	A person who has purchased or is in the process of purchasing an insurance policy through EAA (as underwritten by Mitsui).
Date of Issuance	Date on which this Policy is approved.
EAA	Europ Assistance Australia Pty Ltd
Financial Hardship / FH	Difficulty of a customer or third party (individual) to meet its financial obligations to EAA.
Group	The Generali Group whose ultimate parent Company is Assicurazioni Generali S.p.A. EAA forms part of the Generali Group.
Mitsui	Mitsui Sumitomo Insurance Company

2. Introduction

2.1 OBJECTIVES

Europ Assistance Australia Pty Ltd (hereinafter “EAA”) recognises the negative impact of Financial Hardship on individuals and their families and is therefore committed to finding ways to support its customers or third parties who are experiencing Financial Hardship as required under the General Insurance Code of Practice.

This policy aims to:

- Promote a deeper understanding of Financial Hardship amongst EAA employees and representatives;
- Enable employees and representatives to identify people experiencing Financial Hardship; and
- Define practices and processes designed to better support customers experiencing Financial Hardship.

3. Scope of Application

This Policy applies to all EAA employees who deal with customers (i.e. Claims, Complaints but excludes Sales) and all EAA employees involved in recoveries from individuals.

Although Sales staff are excluded, they are expected to be vigilant, treat customer with due respect, flexibility and should report any matters that concern Financial Hardship to the “Extra Care” Team.

This policy furthermore contains useful and important information for customers or third parties who may be experiencing of Financial Hardship.

3.1 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.

4. What is Financial Hardship?

For the purposes of this policy, Financial Hardship refers to a situation where an insured or third party beneficiary who owes EAA money (i.e. insurance excess) or an individual from whom EAA is seeking to recover money (i.e. an individual that EAA believes has caused damage or loss to an insured covered by an insurance policy issued by EAA), is currently experiencing difficulty in meeting their financial obligations to EAA.

Financial Hardship support under this policy excludes support for the payment of of insurance premiums issued by EAA.

5. Referral of Financial Hardship Cases

Below are a few scenarios on how to refer Financial Hardship cases:

- **Scenario 1:** Due to unforeseen circumstances, the insured has mentioned that he lost his job and thus, claiming for unused travel expenses.
- **Referral:** This case needs to be referred to EAA's The Extra Care Team who shall fast-track the claim within 5 business days without the need for the insured to lodge FH support application or assess whether the process can be recommended.
- **Scenario 2:** Insured owed EAA the medical expenses that EAA paid as Guarantee of Payment ("GOP") during the assistance stage. The case was denied due to a pre-existing condition. The insured has, however, since become disabled with very limited income. Thus, he needs to lodge a FH support application since he cannot repay it all at once.
- **Referral:** This case needs to be referred to EAA's Extra Care Team who may have to fast-track the claim within 5 business days without the need for the insured to lodge a FH support application or get the FH details filled in for additional recommendations.
- **Scenario 3:** Insured has suffered domestic violence previously which EAA has already identified. Insured is living at a different address with a different bank account and is receiving Centrelink support. EAA is recovering the double payment of her claim currently.
- **Referral:** This case needs to be referred to EAA's Extra Care Team. The Extra-care officer should solely contact her and help with the FH support application.

6. Identification and Awareness

EAA trains its employees to help them to identify if a customer or third party individual is experiencing Financial Hardship and determine how support can be provided. Signs that indicate that an individual may be experiencing Financial Hardship includes (but is not limited to) situations where:

- an individual mentions they have recently lost their job;
- an individual has an illness or has suffered an accident that prevents them from earning income;

- an individual mentions, persistently expresses concerns or notes delays in meeting their financial obligations such as is not being able to pay their excess under policy;
- an individual has a disability, including a disability caused by mental illness, that prevents them from earning income;
- an individual is a Centrelink client.
- a non-insured person is liable to a EAA Customer but cannot make payment because he has lost his job.

EAA encourages Customers or their Authorised Agents to tell us about their Financial Hardship circumstances so that we can work with them to discuss their situation and the options available to them.

7. Financial Hardship Support Application

If a customer tells us, or we identify, that they are experiencing Financial Hardship and EAA's 'Extra-Care Team' do not identify a viable option to provide support, i.e. Fast-track the claim or waive the recovery, we will:

- advise them on how to apply for Financial Hardship support; and
- where applicable, provide details for the National Debt Helpline: 1800 007 007 and a warm-transfer of the call at the Customer's request.
- Once a request for Financial Hardship support has been submitted, we will keep the customer and/or their Authorised Agent informed through the Customer's preferred method of communication, unless the customer requests otherwise. The activity shall be recorded in the system for future identification.

7.1 CRITERIA FOR FINANCIAL HARDSHIP SUPPORT APPROVAL

Initial the allowances for a Financial Hardship entitlement is limited to where it can be reasonably established that the Customer is vulnerable. The assessment criteria for vulnerability is based on the Customer meeting any of the below:

- Involuntary unemployment. SUPPORT – Termination Letter, Bank Statements.
- Eligible to receive the Australian Government "Jobkeeper" and that has reduced normal income and placed pressure on the household living expenses – Employers Letter and Evidence of pressure.
- Eligible for "Jobseeker" payment, youth allowance for jobseekers, parenting payment (including the single and partnered payments), special benefit or farm household allowance.
- Customer has been required to take leave without pay for a minimum period of 3 months. SUPPORT - Employers instructions.
- Customer hours of employment have been significantly decreased due to workplace restrictions as a result of a pandemic etc. SUPPORT – Employers instructions.
- Customer has been hospitalised as a result of a pandemic. SUPPORT – Medical Report.
- Terminal/Degenerative Illnesses – Medical Report
- Elderly customers + increased health risk – Medical Report

The allowances for a Financial Hardship entitlement shall be established in line with this policy and the support of the 'Extra-Care Team'.

7.2 ASSESSMENT OF REQUEST FOR FINANCIAL HARDSHIP SUPPORT

Where a Customer or third party individual is affected by Financial Hardship, they can contact EAA on:

financialhardship@europ-assistance.com.au - For any other inquiry related to Financial Hardship.

In assessing a request for Financial Hardship support, EAA shall consider all reasonable evidence i.e.

- Evidence of serious illness or accident that prevents customer from earning income;
- Statement of personal affairs that demonstrates the circumstances;
- Centrelink Statements; and
- Evidence of Customer's Unemployment.

EAA will assess if the circumstances of the claim affect the ability of the Customer to make payment including other claim expenses compared with any available income information provided by the Customer. EAA will request information from Customers only if reasonably necessary to assess the application. If EAA needs more information from the Customer before it can make a decision, then we will:

- inform the Customer of the information we need as early as possible; and
- be specific about the information we need.

The customer will have 21 Calendar Days from the date of our request to provide that information, unless we have agreed to a different timeframe with the Customer.

If we ask the Customer for more information and:

- the customer provides the information we requested, then within 21 Calendar Days of receiving it we will advise the customer in writing of our decision regarding whether to give them Financial Hardship support; or
- the Customer does not provide all information we requested within 21 Calendar Days (or by a later date we agree to), then within 7 Calendar Days of that deadline passing, we will advise the customer in writing of our decision regarding whether to give them Financial Hardship support.

If we conclude that our Customer is not entitled to Financial Hardship support, we will advise them of the reasons for our decision and share our Complaints process.

8. Financial Hardship Measures and Support

EAA has implemented several measures to support individuals experiencing Financial Hardship such as:

- Training its employees and representatives in identifying and managing cases involving Financial Hardship;
- Establishing an "Extra-Care Team" within all Customer facing teams who have been trained and has special skills and knowledge to support customers dealing with Financial Hardship; and
- Raising awareness of Financial Hardship within EAA.

8.1 SUPPORT MEASURES FOR REFUNDS

In line with the 'cooling-off period' defined within EAA's products, Customers are able to obtain a full refund within 14 days of purchasing their policy. This is not considered as Financial Hardship support.

Refunds outside the cooling-off period will not be considered as part of Financial Hardship

but will be reviewed by the “Extra-Care team” for further consideration.

Where Financial Hardship may be evident due to exceptional circumstances affecting EAA’s Customer base i.e. pandemics/epidemics, economic recession or an extreme natural disaster, EAA will consider whether appropriate measures will be made available to Customers.

All measures are to be approved by EAA’s Board, are to be made in agreement with Mitsui.

8.2 SUPPORT MEASURES FOR CLAIMS EXCESS

Our ‘Extra Care’ team (Claims and Complaints only) is granted authority to waive a Customer’s excess where:

- Financial Hardship support has been approved; or
- Financial Hardship has been identified, notified but not yet approved or discussed with the Customer at the discretion of the dedicated ‘Extra Care’ member if reasonably concluded that this measure will ensure the best outcome for both the Customer and EAA.

8.3 SUPPORT MEASURES FOR CLAIMS ASSESSMENTS / PAYMENTS

EAA encourages its employees to fast-track the claims assessment process at the first mention or sign of Financial Hardship and despite the Customer not submitting an application for FH support, provided the claim is not related to an event such as a natural disaster, pandemic or epidemic etc.

In case of an event such as a natural disaster, pandemic or epidemic that caused a Customer to make a claim under their policy and also caused them to be in urgent financial need of the benefits, the Customer is entitled to support under this policy, and EAA will do either or all of the following:

- fast-track both the assessment of the claim and the process we follow to make a decision about the claim;
- pay the Customer an advance amount to help ease their urgent financial need — within 5 Business Days after they demonstrate their urgent financial need.
- In all circumstances, where a Financial Hardship application has been submitted and approved, then EAA will do either or all of the following:
- fast-track both the assessment of the claim and the process we follow to make a decision about the claim;
- pay the Customer an advance amount to help ease their urgent financial need — within 5 Business Days after they demonstrate their urgent financial need.

8.4 SUPPORT MEASURES FOR RECOVERY FROM THIRD PARTY INDIVIDUALS

These support measures are not available to third party corporate entities.

If EAA is taking action to recover an amount from a Customer or 3rd party individual, we will put that action on hold if we identify that they are experiencing Financial Hardship, or if they ask us for Financial Hardship support in relation to that amount.

If the “Extra Care team” decides that an individual is entitled to Financial Hardship support then we will:

- agree on delaying the date on which the payment must be made;
- provide instalment payment options — we will accept a request from our Customers to pay

the amount owed in instalments;

- agree on paying a reduced lump sum amount;
- agree on delaying one or more instalment payments for an agreed period;
- release, discharge, or waive a debt or obligation if asked, however, a Customer is not automatically entitled to this.

EAA will provide customers with possible Financial Hardship:

- with a process to apply for Financial Hardship support; and where applicable
- provide contact details for the National Debt Helpline: 1800 007 007.

The Compliance and Risk Committee has the discretion to decide whether any recovery action should be put on hold.

8.5 SUPPORT MEASURES FOR COMPLAINTS

All measures identified above are available depending on the Customers' specific circumstances as identified by the 'Extra-Care Team' member in the Complaints area. EAA will provide customers with possible Financial Hardship:

- With a process to apply for Financial Hardship support; and where applicable
- provide contact details for the National Debt Helpline: 1800 007 007.

9. Extra-Care Team Responsibilities

EAA's Extra-Care Team is responsible for:

- Promoting Financial Hardship awareness within EAA,
- Engaging with customers experiencing Financial Hardship and/or applying for Support Measures;
- Assessing Financial Hardship applications;
- Helping Customers & third party individuals to access specialist external support.

10. Privacy

EAA recognises the importance of privacy, particularly in cases of Financial Hardship and is therefore committed to handling information related to Financial Hardship confidentially and securely in line with its internal *Data Privacy Policy* and the *Privacy Policy* on its websites. EAA will advise Customers regarding the information that would be shared with other policyholders, i.e. information about a claim, so that alternative arrangements can be made if needed.

11. Complaints

EAA is committed to handling any concerns or complaints our customers may have in relation to services or any other matter relating to Financial Hardship. Our complaints contact details are made available on our website.

Any complaints received by our Dispute Resolution team relating to Financial Hardship applications, will be dealt with by the nominated 'Extra Care Team' member inside the Dispute Resolution team and will be prioritised for resolution. If the outcome or support by

the Extra Care Team is not satisfactory, this shall be reviewed internally by our Complaints Committee (“Committee”).

The ‘Extra-Care Team’ member is responsible for escalating the matter to the Committee. If the Customer is still not satisfied, they may lodge a complaint with the Australian Financial Complaints Authority (AFCA) at any time of the process.

12. External Support

The National Debt Helpline provides financial counselling and information for people experiencing financial difficulty to achieve better money management and budget. They can assist with:

- rights and responsibilities
- access to relevant government and community grants
- referrals to other free community-based services (such as free legal advice and support).

Phone: 1800 007 007 (Monday to Fri day, 9am to 5pm)

Website: <http://www.ndh.org.au>

13. Additional Considerations Regarding Recoveries

EAA or a collection agent or solicitor used for collecting money for us, will comply with the Debt collection guideline for collectors and creditors published by the Australian Competition and Consumer Commission and the Australian Securities and Investments Commission, and;

- is required to understand the Financial Hardship requirements in the Code and receive training to help identify whether you might need Financial Hardship support.
- will ensure during the first communication with you that the communication provides information to show that the amount we are seeking to recover from you is fair and reasonable. This will include information about our Financial Hardship process and contact details to enable the person to contact us to discuss Financial Hardship support.

If a Customer or third party individual tell us about their intention to declare bankruptcy, then we will work with them (or their representative) to agree on the amount owed and give the person written confirmation of that amount for the purposes of the declaration of bankruptcy.

14. Training and Promotion

EAA has developed the following ongoing training requirements to promote the understanding of the policy, and continued professional development of our team, especially our “Extra Care” Team:

- All Customer facing Employees receive internal Code of Practice, Vulnerability and Financial Hardship training as upon their induction to EAA.
- Every member of the ‘Extra Care’ team receives additional external training for Code of Practice, Vulnerability and Financial Hardship upon their induction as an “Extra Care’ team member.
- Every member of the ‘Extra Care’ team receives annual external Training for Code of

Practice, Vulnerability and Financial Hardship as refresher training, which may include technical and/or soft skill components.

- Every Customer facing employee and member of the 'Extra Care' team receives annual internal Code of Practice, Vulnerability and Financial Hardship as refresher training, which may include technical and/or soft skill components.

EAA will also promote this policy by:

- prominently publishing relevant information about Financial Hardship on our website, making clear
- options available and explaining how to access the support;
- publishing contact details for external specialist services;
- where relevant and appropriate, promoting knowledge about Financial Hardship; and
- continuously monitoring, updating and developing this Policy and associated procedures.

15. Data Management and Reporting

EAA's systems are able to record activity related to Financial Hardship and can extract case reports to ensure appropriate monitoring of these cases. Data and reports on Financial Hardship performance will be prepared and managed in line with EAA's *Data Privacy Policy*.

16. Roles and Responsibilities

Role	Responsibility
Board of Directors	Ultimately responsible for ensuring compliance with this policy
Compliance Department	Make amendments and approve changes to the policy when required; Provide recommendations for changes according to Complaints trends or regulatory changes.
'Extra Care Team' and Customer Representative	Follow the procedures outlined in this policy to support customers who are experiencing Financial Hardship, and to respond to and refer it accordingly; Report possible or actual breaches of this policy to the direct Manager or the Compliance department within 48 hours.
Internal Dispute Resolution Team	Follow the procedures outlined in this policy; Engage as part of 'Extra Care Team' when resolving complaints with Financial Hardship.
All Client Facing Employees	Follow the procedures outlined in this policy; Undergo mandatory training on the General Insurance Code of Practice and, in particular, supporting customers with Financial Hardship;

	Report possible or actual breach of this policy to the direct Manager or the Compliance Department within 48 hours.
External Service Providers (Local)	Provide certification/documentation to EAA that confirms compliance with the General Insurance Code of Practice; Cooperate by providing information to EAA about any customer experiencing Financial Hardship or the performance of any representative involved in the application of this policy; Report possible or actual breach of this policy to the direct Manager who is working with the service provider within 48 hours.
External Service Providers (International)	Provide credentials of similar regulation and/or adherence to this policy as part of the service agreement with EAA; Cooperate by providing information to EAA about any customer experiencing Financial Hardship or the performance of any representative involved in the application of this policy; Report possible or actual breach of this policy to the direct Manager who is working with the service provider within 48 hours.

17. Policy Review

This policy shall be reviewed by the Compliance Department on at least an annual basis.