

## All Risk Protection Pty Ltd Vulnerable Customer Policy

### 1. Purpose

All Risk Protection Pty Ltd ('All Risk', 'we', 'our') recognises that any customer may experience vulnerability at any time. Vulnerability may affect a person's ability to engage with insurance services, make informed decisions, or participate in claims and complaint processes. This policy sets out how we identify and support vulnerable customers and embeds our obligations under ASIC Regulatory Guide 271: Internal Dispute Resolution (RG271) and the Insurance Brokers Code of Practice (IBCP).

### 2. Our Commitment

- ✓ Treat customers experiencing vulnerability with sensitivity, dignity, respect and compassion.
- ✓ Provide reasonable adjustments and accessible communications, including working with you and any interpreter services or support person you have authorised or arranged where appropriate.
- ✓ Operate a fair, timely and accessible complaints process that meets RG271 standards
- ✓ Train staff to recognise vulnerability and respond appropriately; monitor effectiveness and continually improve.

### 3. Understanding Vulnerability

**Personal factors:** age; disability; physical or mental health; low literacy or English proficiency; family or domestic violence; financial hardship.

**Situational & community factors:** natural disasters; pandemic; remote location; limited access to services; digital or financial literacy barriers.

**Business-related factors (SME clients):** economic downturn; cash-flow distress; lending pressures.

### 4. Staff Responsibilities & Training

- ✓ Identify indicators of vulnerability as part of client onboarding process and ongoing interactions.
- ✓ Adapt communications (pace, language, channel) and offer written summaries or third-party support if requested.
- ✓ Escalate complex matters to Compliance and record actions taken to avoid repeated disclosures.

### 5. Communication Support

Where appropriate and practicable, we will:

- ✓ Provide additional time and simplified explanations.
- ✓ Offer communications through authorised representatives/carers.
- ✓ Work with you through interpreter services (e.g., TIS National) and alternative formats.
- ✓ Follow up with written summaries where helpful.

## 6. Complaints & Dispute Resolution (RG271)

We manage complaints in line with RG271. Key commitments are:

- ✓ Acknowledgement: within 24 hours or one business day of receipt, whichever is the latter.
- ✓ Resolution: most complaints are to be resolved within 30 days
- ✓ Outcome letters: clear reasons, actions taken, and AFCA referral rights.
- ✓ Accessibility: multiple lodgement channels; support where a customer cannot complain in writing; allowance for representatives.
- ✓ Fairness: minimise re-disclosure; tailor our approach where vulnerability is identified.

## 7. Insurance Brokers Code of Practice (IBCOP) Obligations

- ✓ Identify vulnerable clients and provide additional care and flexibility.
- ✓ Train staff to recognise and respond to vulnerability; maintain policies and procedures.
- ✓ Ensure services are accessible; communicate in appropriate formats and channels.
- ✓ Refer customers to specialist services where appropriate.

## 8. External Support Services

Where suitable, we may refer customers to independent support services:

Service	Phone Number	Website
National Debt Helpline	1800 007 007	ndh.org.au
Lifeline	13 11 14	lifeline.org.au
1800Respect	1800 737 732	1800respect.org.au
Beyond Blue	1300 224 636	beyondblue.org.au
QLife	1800 184 527	qlife.org.au
Gambling Help Online	1800 858 858	gamblinghelponline.org.au
Counselling Online	1800 422 599	counsellingonline.org.au

## 9. Privacy & Confidentiality

We only record information about a customer's vulnerability where it is necessary to support them and permitted by law. We explain how it will be used and obtain consent before sharing with insurers or third parties, unless otherwise permitted or required by law.

## 10. Review & Continuous Improvement

This policy will be reviewed at least annually, or earlier if there are changes to RG271, the Insurance Brokers Code of Practice, AFCA guidance, or industry best practice. We monitor effectiveness, staff feedback and complaint trends to drive improvement.

**Note:** This policy forms part of All Risk Protection's client care framework and should be read alongside our Complaints Process & Policy and Incident & Breach Management Manual.