



**NORTHERN1**  
INTERNATIONAL  
INSURANCE BROKERS

# FAIR TREATMENT OF VULNERABLE CUSTOMERS POLICY

## 1. PURPOSE

This Fair Treatment of Vulnerable Customers Policy (Policy) has been developed to sets out how Northern1 international insurance brokers OÜ (Northern1) identifies and supports vulnerable Customers, including those affected by Financial Hardship and Family Violence.

For the purposes of this Policy, any reference to "Customers" includes customers of Northern1 as well as any other individual entitled to Financial Hardship support. This could include individuals who we are seeking to recover money from as we believe they have caused damage to an insured Customer.

This policy forms part of the Northern1 Compliance Management System which represents the entire suite of policies and procedures that fulfill Northern1's legal and regulatory requirements as an Estonian insurance broker company providing intermediary services under supervision of Estonian Financial Supervision and Resolution Authority.

Northern1 is committed to exercising greater care when dealing with vulnerable Customers. A person may be vulnerable due to a range of factors, including:

1. age;
2. disability;
3. mental health conditions;
4. physical health conditions;
5. family violence;
6. language barriers;
7. cultural background;
8. remote location; or
9. financial distress.

## 2. POLICY STATEMENT

Northern1 has a commitment to conduct its business with integrity and remains committed to full compliance with the Code of Conduct and informing Customers, employees, distributors, and outsourced service providers about information and assistance available to vulnerable people, including those experiencing Financial Hardship and Family Violence.

This policy and the Northern1 internal policy and training programs assist employees to:

1. understand if a Customer may be vulnerable;
2. determine how best, and to what extent, they can support a vulnerable Customer;
3. take account of a Customer's particular needs or vulnerability; and
4. engage with a vulnerable Customer with sensitivity, dignity, respect and compassion. This may include arranging additional support and referring the Customer to specialised people or services.

Northern1 may need to be flexible and vary the approach based on individual circumstances, including providing more personalised support to help navigate our processes.



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## 3. FAMILY VIOLENCE

Family violence (including intimate partner violence) is any kind of mental, physical, or sexual violence that occurs between people who are currently or have previously been in a close relationship with each other. These can be current or former spouses and partners, relatives, relatives, or other close relations, regardless of whether the perpetrator currently lives or previously lived in the same premises as the victim.

Family Violence means much more than physical violence. It includes:

- emotional abuse, psychological abuse, sexual abuse, financial or economic abuse; and
- damage to property.

The way employees deal with Customers who may be affected by Family Violence should facilitate, rather than act as a barrier to identifying Family Violence and improve the experience of those affected by Family Violence.

The aim of the Policy is to ensure that whenever Family Violence is identified or suspected, the safety of the Customer affected by Family Violence and their family is protected.

Northern1 recognises that Family Violence is unacceptable in any relationship and Customers experiencing Family Violence will be treated with dignity and respect.

## 4. ASSISTING CUSTOMERS

Northern1 can assist vulnerable Customers, including those experiencing Financial Hardship or Family Violence by:

- ensuring safe and confidential communication in light of individual circumstances;
- helping to set up new insurance policies;
- helping to arrange access to financial hardship support; and
- referral to specialist support services.

In circumstances where the issue is complex or unable to be dealt with by the primary person who took the call, it is to be referred to the help out of the house for consideration. The Customer must be informed of this action.

## 5. INTERPRETERS

If a Customer informs Northern1 of their need for an interpreter, or we identify such a need, we will direct the Customer to the relevant section of the insurer's website.

## 6. IDENTIFICATION

If a Customer requires support to meet identification requirements, Northern1 will take reasonable measures to provide such support.

## 7. FINANCIAL HARDSHIP

Financial Hardship occurs when Customers experience difficulty in meeting their financial obligations to Northern1 or our outsourced partners.

The support Northern1 can offer does not include support with paying the premiums under an insurance policy we have issued.

If a Customer informs Northern1, or we identify, that they are experiencing Financial Hardship, we will provide them with:

- a copy of our Financial Hardship Assistance Application Form; and
- upon receiving filled in Financial Hardship Application Form, Northern1 takes the necessary steps to find a solution, including discussing the situation with the insurer.



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## 7.1 Assessing requests for Financial Hardship support.

When assessing requests for Financial Hardship support, Northern1 will consider all reasonable evidence, including:

- evidence of serious illness that prevents the Customer from earning an income;
- evidence of a disability, including a disability caused by mental illness; and
- evidence of unemployment.

If Northern1 requires additional information after receiving the application, we will inform the Customer of the information required as soon as possible. The Customer will have 21 calendar days from the day of the request to provide the additional information unless an alternative timeframe has been agreed.

## 7.2 Putting Recovery on Hold

If Northern1 is taking action to recover an amount from a Customer, the action will be put on hold if we identify the Customer is experiencing Financial Hardship or if the Customer requests Financial Hardship support in relation to that amount.

When putting the action on hold, Northern1 will contact any collection agent or lawyer we have appointed and inform them the action is on hold. The action will remain on hold until we have assessed the Financial Hardship application and notified the Customer of the decision.

## 7.3 Making our Decision

Northern1 will inform the Customer in writing of our decision about whether to give Financial Hardship support within 21 calendar days of receiving the application, unless we have requested additional information.

## 7.4 Customers entitled to Financial Hardship support

If Northern1 determines a Customer is entitled to Financial Hardship support, we will work together with insurer and with the Customer to implement an arrangement that could include any one or more of the following:

- delaying the date on which payment must be made;
- paying in instalments;
- paying a reduced lump sum amount;
- delaying one or more instalment payments;
- deducting the excess from the claim amount paid.

## 7.5 Customers not entitled to Financial Hardship support

If Northern1 determines a Customer is not entitled to Financial Hardship support, we will inform them of the reasons for the decision and about our complaints process.

## 8. PROTECTING PERSONAL INFORMATION

At all times and in accordance with privacy laws and Northern1 privacy policies, we will ensure the secure and confidential handling of private, confidential, and personal information about vulnerable Customers, including those affected by Family Violence, in order to protect their safety. This will enable Customers to have confidence that such information is secure and not at risk of deliberate or inadvertent disclosure.

The Code requires Northern1 to protect the right to privacy of vulnerable Customers who have notified us of their need for additional support from someone else. For example, a lawyer, consumer representative, interpreter or friend.



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## 9. TRAINING

9.1 Training is tailored to all employee roles within the business and the degree of contact they have with Customers.

Northern1 will aim to ensure that all employees and third-party providers or outsources partners have been trained and receive ongoing training so that they:

- are aware of Northern1 policies and procedures when they are engaging with vulnerable Customers;
- identify vulnerable Customers, including those affected by Family Violence;
- deal appropriately and sensitively with vulnerable Customers; and
- apply the Family Violence & Supporting Vulnerable Customers policy and related policies and procedures relevant to their role in dealing with Customers.

Training is aimed at assisting employees to reduce the impact of vulnerability and Family Violence on Customers.

9.2 Northern1 will ensure that service suppliers who deal directly with Customers, such as loss assessors, investigators and claims management services are trained to the same level as our employees.

## 10. REPORTING

Any notification of Vulnerability or Financial Hardship received by a member of staff must be reported via e-mail [info@northern1.com](mailto:info@northern1.com).

## 11. REVIEW DATE

This Policy is due for review once per year.