## **Fair Conduct Programme Summary**

Mitsui Sumitomo Insurance Company Limited (MSI NZ) (283534) has a Fair Conduct Programme which is designed to ensure its New Zealand insurance business treats consumers fairly, when interacting with consumers in relation to its consumer insurance contracts and when designing, offering and providing those contracts (MSI NZ's consumer insurance services).

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Key features of MSI NZ's Fair Conduct Programme	Summary
What is the Fair Conduct Principle?	<ul> <li>The Fair Conduct Principle is that financial institutions must treat consumers fairly, including (but not limited to):</li> <li>paying due regard to its consumers' interests;</li> <li>acting ethically, transparently, and in good faith;</li> <li>assisting consumers to make informed decisions;</li> <li>ensuring that the relevant services and associated products that MSI NZ provides to consumers are likely to meet the requirements and objectives of likely consumers (when viewed as a group); and</li> <li>not subjecting consumers to unfair pressure or tactics or undue influence.</li> </ul>
How MSI NZ will comply with the Fair Conduct Principle	<ul> <li>To meet the Fair Conduct Principle, MSI NZ will take reasonable steps to comply with its Fair Conduct Programme. MSI NZ's Fair Conduct Programme requires:</li> <li>Employees and agents: MSI NZ's employees and agents who provide MSI NZ's consumer insurance services are expected to be familiar with, and take all reasonable steps to comply with, MSI NZ's Fair Conduct Programme. To assist, MSI runs an FCP training programme which covers MSI NZ's consumer insurance services and the requirements of MSI NZ's Fair Conduct Programme. Employees and agents are also expected to communicate with customers in a timely, clear, concise and effective manner and, if a customer is vulnerable, in accordance with MSI NZ's Supporting Customers Experiencing Vulnerability Procedures.</li> <li>FCP Compliance Assurance Programme: MSI NZ operates an</li> </ul>
	<ul> <li>FCP Compliance Assurance Programme: MSI NZ operates an FCP Compliance Assurance Programme under which MSI NZ conducts multi-level reviews to identify conduct involving consumers that fails to comply with the Fair Conduct Principle and to identify reasonable steps to mitigate any actual or potential adverse effects of such failures. MSI NZ also has a consumer law compliance process which is designed to ensure MSI NZ meets all its legal obligations to consumers, and product design, management and governance processes which require regular reviews of its NZ consumer insurance contracts.</li> </ul>
	Risk Management: MSI NZ's risk identification, monitoring and management policies, procedures, systems and controls cover the risk that MSI NZ's conduct fails to comply with the Fair Conduct.

those risks.

risk that MSI NZ's conduct fails to comply with the Fair Conduct Principle. MSI NZ's Risk Management Strategy and Framework specifies clearly roles, responsibilities, and accountability

arrangements in relation to identifying, monitoring, and managing

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	Governance: The MSI NZ Fair Conduct Programme is overseen by the Executive Committee of MSI Oceania on behalf of the MSI Board. MSI has implemented an internal governance and reporting structure to appropriately manage and oversee MSI NZ and its Fair Conduct Programme. Responsibility for MSI NZ's Fair Conduct Programme is delegated to senior managers who are expected to seek assurances of the capability of each employee, set the tone for MSI's fair conduct expectations, give regular feedback to employees, monitor employees' compliance with the Fair Conduct Programme and discipline any breaches.
	<ul> <li>Fair Conduct Programme Review: Fair Conduct Programme is subject to regular reviews of its operation and effectiveness. Where a deficiency in the Fair Conduct Programme is identified, MSI NZ has procedures in place to promptly remediate the deficiency and ensure MSI NZ's continued compliance with the Fair Conduct Principle.</li> </ul>
Contact Details	This description is designed to assist consumers make informed decisions about their dealings and interactions with MSI NZ in relation to MSI NZ's consumer insurance services. For more information, consumers can contact MSI NZ at +64 9363 2742 or <a href="mailto:msiaus@ms-ins.com.au">msiaus@ms-ins.com.au</a> .
Complaints process	Consumers can make a complaint about MSI NZ's services and associated products by following the complaints process <a href="https://www.msi-oceania.com/">https://www.msi-oceania.com/</a> .  If MSI NZ receives a complaint from a consumer, MSI NZ will use reasonable endeavours to deal with that complaint in accordance with its Complaints Management policy and the <a href="Fair Insurance Code">Fair Insurance Code</a> developed by the Insurance Council of New Zealand.

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