



# Summary of Key Matters about Hallmark’s Fair Conduct Programme

## Fair Conduct Programme Summary

As licensed insurers, **Hallmark Life Insurance Company Limited** and **Hallmark General Insurance Company Limited** (together “Hallmark”) is required to establish and maintain a Fair Conduct Programme.

Our **Fair Conduct Programme** comprises a structured framework of policies, processes, systems and controls designed to ensure the **fair treatment of our customers** and adherence to the **Fair Conduct Principle**.

## The Fair Conduct Principle

The Fair Conduct Principle mandates that Hallmark treats its customers fairly. This includes, but is not limited to:

- Designing and distributing financial products and services that meet customer needs.
- Providing clear, accurate, and accessible information to support informed decision-making.
- Ensuring sales, advice, and claims processes are conducted ethically and transparently.
- Recognizing and addressing the needs of vulnerable customers.
- Monitoring and reviewing our conduct and practices to ensure continuous improvement.
- Embedding fair treatment of customers into our corporate culture and governance.

Through our Fair Conduct Programme, we are committed to fostering trust and delivering fair outcomes for all customers throughout their journey with us.

## Elements of Hallmark’s Fair Conduct Programme

Hallmark is committed to treating its customers fairly. The following elements of our Fair Conduct Programme, support Hallmark to ensure its customers are treated fairly.

Element of Hallmark’s Fair Conduct Programme	Summary of the key policies, procedures, systems and controls that support fair treatment of Hallmark’s customers.
How we meet our obligations to customers	<ul style="list-style-type: none"> <li>• Hallmark maintains a Compliance Framework to oversee and manage regulatory and legal obligations, with regular reporting to senior management and the Board.</li> </ul>
Product Governance and Distribution	<ul style="list-style-type: none"> <li>• Hallmark has customer-centric design procedures to ensure that financial products are appropriate for their intended target market.</li> <li>• A Product Governance Framework is in place to continuously monitor and review products and distribution methods, ensuring they remain suitable for their target customers.</li> <li>• When deficiencies are identified, remediation actions are taken, and improvement opportunities are assessed and prioritised by senior management.</li> </ul>

Hallmark Life Insurance Company Ltd ABN 87 008 446 884 AFSL 243469 and / or Hallmark General Insurance Company Ltd ABN 82 008 477 647 AFSL 243478 (collectively “Hallmark Insurance”). Hallmark Insurance is part of the St Andrew’s Insurance Group (incorporated in Australia and operating in Australia and New Zealand)

Risk Management	<ul style="list-style-type: none"> <li>• Hallmark operates a comprehensive risk and compliance framework that supports the effective management of risk, including conduct risk.</li> <li>• A three lines of defence model is in place to define clear roles and responsibilities for identifying, monitoring, and managing material risks, including conduct risk.</li> <li>• Regular reporting on conduct risks and compliance with the Fair Conduct Principle is provided to senior governance forums.</li> </ul>
Staff training and conduct	<ul style="list-style-type: none"> <li>• All employees and agents are provided with role-specific training and mandatory compliance training including training on Hallmark’s Fair Conduct Programme.</li> <li>• Hallmark enforces clear conduct expectations through its Code of Conduct, which is embedded into workplace culture.</li> <li>• Monitoring and supervision processes ensure that staff behaviour aligns with the Fair Conduct Principle.</li> <li>• A Whistleblower Policy and Procedure is in place, enabling staff and agent to report conduct concerns confidentially without fear of retaliation.</li> </ul>
Oversight of Intermediaries	<ul style="list-style-type: none"> <li>• Hallmark has governance processes and ongoing monitoring in place to ensure that its intermediary distribution methods align with the Fair Conduct Principle and the Fair Conduct Programme.</li> </ul>
Communication with customers	<ul style="list-style-type: none"> <li>• Hallmark’s employees are required to communicate in a timely, clear, concise, and effective manner to support customers in making informed decisions about products and services.</li> <li>• Customers can contact X through multiple communication channels, including phone, email, and written correspondence. Additional measures are in place to ensure appropriate communication and support for vulnerable customers.</li> <li>• Hallmark has established procedures for reviewing and refining customer communications to ensure clarity, accuracy and effectiveness.</li> </ul>
Managing incentives	<ul style="list-style-type: none"> <li>• Hallmark’s Remuneration Framework ensures that staff incentives align with positive customer outcomes, promoting fair and ethical behaviour.</li> </ul>
Governance	<ul style="list-style-type: none"> <li>• Hallmark’s Fair Conduct Programme is overseen and approved by the Board.</li> <li>• Internal governance structures, delegations and reporting frameworks ensure proper oversight of Hallmark’s operations and the execution of its Fair Conduct Programme.</li> <li>• The day-to-day management of the policies, procedures, systems and controls that constitute Hallmark’s Fair Conduct Programme, is delegated to senior management.</li> </ul>
Fair Conduct Programme (FCP) review	<ul style="list-style-type: none"> <li>• Hallmark reviews its Fair Conduct Programme annually or sooner if required due to regulatory, legislative or material business changes.</li> <li>• Individual policies, procedures, systems, and controls within the Fair Conduct Programme are subject to their own review cycles or trigger based evaluations.</li> <li>• Any deficiencies identified through reviews are promptly addressed through remediation actions.</li> </ul>



Customer Support and Contact Information	<ul style="list-style-type: none"><li>• This summary is designed to help customers understand Hallmark’s commitment to fair conduct and to assist them in making informed decisions when dealing with Hallmark and its financial products.</li><li>• For further details, you can contact Hallmark via the details on our ‘Contact Us’ page located <a href="#">here</a>.</li></ul>
Making a complaint	We are committed to delivering high-quality products and exceptional service. However, if we do not meet your expectations, we encourage you to provide feedback. For more information on how to make a complaint, please click <a href="#">here</a> .