

Level 33 201 Kent Street Sydney NSW 2000 GPO Box 4189 Sydney NSW 2001 DX 10206 Sydney Stock Exchange T 1800 010 248

E property.managers@aondirect.com.au

Dear Director/The Principal,

# RESIDENTIAL PROPERTY INSURANCE PRODUCTS – COMPLIANCE ASSISTANCE KIT

You are being appointed as a distributor under Aon Risk Services Australia Limited's (ABN 17 000 434 720) (Aon's) Australian Financial Services Licence (AFSL) (licence number 241141) respect of Aon's Rental Protection Plus (including residential building and contents) insurance products and services (Aon Products).

The Australian Securities and Investments Commission (**ASIC**) has put in place *ASIC* Corporations (Basic Deposit and General Insurance Product Distribution) Instrument 2015/682 (**General Insurance Distribution Instrument**) so that you, as a "distributor", do not need to obtain an AFSL, when dealing in insurance for your customers.

If you are operating as an individual or partnership, to obtain the benefit of the General Insurance Distribution Instrument you must not have had a banning order issued under section 920B of the *Corporations Act 2001 (Cth)* (the Act) prohibiting the following:

- · provision of any financial services;
- provision of specific financial services in specified circumstances or capacities;
- performing any function involved in the carrying on of a financial services business; or
- performing specified functions involved in the carrying on of a financial services business.

If applicable, we assume that you have not been issued with a banning order under section 920B of the Act. If our assumption is incorrect, please let us know immediately.

As you are dealing in these **Aon Products** for your clients on behalf Aon, there are certain regulatory obligations

must satisfy under the terms of the General Insurance Distribution Instrument and as outlined in your Distributor Agreement with us. Some of the key regulatory obligations are detailed in the enclosed table we have prepared to assist you comply with your responsibilities as an authorised distributor of Aon Products on behalf of Aon.



Please note, failure to comply with these regulatory obligations may result in a termination of your Distributor Agreement.

#### To assist

to comply with the applicable regulatory obligations we may ask you annually to participate in our audit and monitoring requirements, such as:

- · completing an attestation as to compliance with applicable regulatory obligations, and
- certifying that the regulatory obligations under the Distributor Agreement and the enclosed table have been satisfied.

This will be sent to you electronically.

It is also important that you retain records of all customer communications, as we may from time to time, audit customer records to ensure regulatory documents were provided.

Please note that we are not able to provide any legal advice in relation to this letter, including the enclosed table. These have been provided for your general information purposes only. Please feel free to obtain your own independent legal advice if you have any concerns.

If you would like to discuss the contents of this letter further, please feel free to contact us on **1800 010 248** or email us on <u>property.managers@aondirect.com.au</u>

Yours sincerely

**Aon Landlords Team** 



### YOUR OBLIGATIONS IN RELATION TO THE AON PRODUCTS

### **Definitions**

In reading the table below, please note the following defined terms:

### **Table of Obligations & Other Information**

Obligations	Requirement
Disclosure of general information	You must use the following form of disclosure on any websites where coverage is advertised:
	act as a distributor of Aon Risk Services Australia Limited ABN 17 000 434 720, AFSL 241141 (Aon) in dealing in certain insurance underwritten by CGU Australia ABN 11 000 016 722, AFSL 227681. Please contact us if you have any queries.
	<ul> <li>Only applicable for renewals via post You must take all reasonable steps to provide the following factual information about the Aon Products to any Insured, as well as any potential Insured: <ul> <li>explanation of your role as distributor in arranging the cover;</li> <li>details of any remuneration (including commission) or other benefit you as distributor may receive from Aon as a result of arranging the insurance cover; and</li> <li>details of Aon's complaint handling process and how that can be accessed.</li> </ul> </li></ul>
	Annexure A or B (depending on whether you elect to receive commission [Annexure A] or not [Annexure B]) is an Important Distributor Notice that <u>must</u> be provided to Insureds to cover the above.



### You **must not** provide any advice to clients

You must not under any circumstance provide any advice to a client in relation to **Aon Products**. Advice is an opinion, recommendation or statement that is intended to influence a person or persons in making a decision in relation to purchasing insurance. Advice is different from providing factual information and generally includes phrases such as "I think", "in my opinion" or "I would recommend." Some specific examples of giving advice include:

"I think you should get insurance"

"It's the cheapest product you can get"

"I think you should buy this policy, it's the best one available" "In my opinion Insurance Company X is the better one"

As our distributor, you cannot provide your clients with advice on **Aon Products** or any insurance products, however you can provide your clients with factual information about the product.

Should your clients require advice on an Aon product, you should refer them to Aon's Landlord Team on 1800 010 248 or landlords@aondirect.com.au

## Documents must be provided to your client

## Only applicable for renewals that are not transacted through Aon's digital platform

Upon receipt of the client policy documents from Aon, you must email your client (or post if unable to email) a copy of the policy documents and the following within 5 business days:

- Important Distributor Notice (contained at Annexure A or B, depending on whether you elect to receive commission) on your letterhead;
- Aon's Financial Services Guide (FSG);
- Product Disclosure Statements (PDS);
- o <u>Terms of Business Agreement</u> (TOBA);
- o Aon's Privacy Notice; and
- o The relevant of either:
  - o Important Notices (Binder)
  - Important Notices (Non-Binder)

(together, Regulatory Documents)



	NB. These documents must be emailed (or posted if unable to email) to the client and a record of that email saved on file. For Digital renewals, these will be sent to the client automatically.
Client records must be kept and reported to Aon	All client records including email correspondence to clients must be kept for a minimum period of 7 years. Aon will audit to ensure these requirements have been met.
	For existing clients and postal renewals (prior to digital transition), you must keep records of which clients have taken out the <b>Aon Products,</b> including their contact details, and report it to your Aon representative every 6 months.
Complaints must be reported to Aon	If you receive a complaint in relation to the <b>Aon Products</b> or services (Aon services, or your services in relation to the <b>Aon Products</b> ) from a client, you must immediately inform Aon Compliance by emailing <a href="mailto:au.compliance@aon.com">au.compliance@aon.com</a> .  A complaint is an expression of dissatisfaction made to or about an organization, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.  A complaint can either be in writing or verbal and does not according to a complaint.
Claims must be reported to CGU	need to contain the word 'complaint'.  If a client submits a claim under their <b>Aon Products</b> you must immediately notify CGU by emailing <a href="mailto:claims@cgu.com.au">claims@cgu.com.au</a> or calling 13 24 80 or refer to <a href="mailto:www.cgu.com.au/claims">www.cgu.com.au/claims</a> . You must not assist clients with any claims processing.
Do not publish material without Aon's prior consent	You must not publish any material that refers to Aon or <b>Aon Products</b> , in either hardcopy or electronically, without Aon's prior written consent.
Client must request/consent to be offered an Aon product	Under the Anti-Hawking (RG38) provisions, <b>Aon Products</b> must not be offered to your client unless the client has consented in the rental management agreement to receive information in relation to <b>Aon products</b> and/or for you to arrange insurance on their behalf in relation to their property.



	Aon will periodically audit rental management agreements to confirm compliance with this obligation. Failure to comply with this obligation may be a breach reportable to the regulator, ASIC.
Accuracy of information	Any information you complete for or on behalf of the client must be completed accurately.
If you fail to comply with any of your obligations	Upon discovering that you have failed to comply with any of the listed obligations in this table, or an obligation under the Distributor Agreement, you must immediately notify Aon Compliance by emailing <a href="mailto:au.compliance@aon.com">au.compliance@aon.com</a> .



**Annexure A** (where you have elected to receive commission)

Please copy the text below onto your letterhead

#### **Important Distributor Notice**

Our Real Estate office (we) act as a distributor of Aon Products (Distributor) for Aon Risk Services Australia Limited ABN 17 000 434 720 AFSL 241141 (Aon). Aon is licensed and authorised to deal in and provide financial advice in relation to all general insurance products.

As a Distributor of Aon, we are authorised to deal in, and can assist you in arranging Aon's Rental Protection Plus (including residential building and contents) insurance products and services (Aon Products).

However, we are unable to provide you with any advice, recommendation or our own opinion in relation to these insurance products. Information we may provide you on Aon Products, including representations as to features of the Insurance, is not intended to be financial advice, and should not be construed or relied on as such. You should read the Product Disclosure Statements, the Aon Financial Services Guide and Target Market Determinations (TMD) carefully, assess whether the products are appropriate for you, and consider talking to an adviser before deciding to purchase the insurance. Please note the TMD is available on Aon's website (<a href="https://www.aon.com">www.aon.com</a>)

A copy of the Aon Financial Service Guide and insurer Product Disclosure Statements will be made available to you. Aon's Financial Services Guide can also be accessed through Aon's website. Please consider these documents before deciding whether the relevant insurance is right for you.

We will receive 7.5% commission based on premiums paid by you for the Aon Products. The percentage shown is a percentage of all premiums paid (less returns if applicable) and received by Aon from you excluding stamp duty, fire services levy and Goods and Service Tax (**GST**).

If you have a concern or complaint about the Aon Products we have provided you as a Distributor of Aon, you should contact Aon's Complaints Manager at:

Complaints Manager Aon Risk Services Australia Limited GPO Box 4189



# Sydney NSW 2001 <a href="mailto:au.compliance@aon.com">au.compliance@aon.com</a>

If you are not satisfied with the outcome determined by the Complaints Manager, you may contact the Australian Financial Complaints Authority (AFCA) who is an independent external dispute resolution body. AFCA's contact details are as follows:

Phone: 1800 931 678

Email: info@afca.org.au

Website: www.afca.org.au

Mail: GPO Box 3 Melbourne VIC 3001

You have two years from the date of Aon's complaint response letter to refer the matter to AFCA



Annexure B (where you have elected to not receive any commission)

Please copy the text below onto your letterhead

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As a Distributor of Aon, we are authorised to deal in, and can assist you in arranging Aon's Rental Protection Plus (including residential building and contents) insurance products and services (Aon Products).

However, we are unable to provide you with any advice, recommendation or our own opinion in relation to these insurance products. Information we may provide you on Aon Products, including representations as to features of the Insurance, is not intended to be financial advice, and should not be construed or relied on as such. You should read the Product Disclosure Statements, the Aon Financial Services Guide and Target Market Determinations (TMD) carefully, assess whether the products are appropriate for you, and consider talking to an adviser before deciding to purchase the insurance. Please note the TMD is available on Aon's website (<a href="https://www.aon.com">www.aon.com</a>)

A copy of the Aon Financial Service Guide and insurer Product Disclosure Statements will be made available to you. Aon's Financial Services Guide can also be accessed through Aon's <a href="website">website</a>. Please consider these documents before deciding whether the relevant insurance is right for you.

If you have a concern or complaint about the Aon Products we have provided you as a Distributor of Aon, you should contact Aon's Complaints Manager at:

Complaints Manager
Aon Risk Services Australia Limited
GPO Box 4189
Sydney NSW 2001
au.compliance@aon.com



If you are not satisfied with the outcome determined by the Complaints Manager, you may contact the Australian Financial Complaints Authority (AFCA) who is an independent external dispute resolution body. AFCA's contact details are as follows:

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