

PPS Mutual Professionals' Choice

# Adviser Handbook



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### Introduction

We have chosen to operate our network of trusted advisers a little differently to market. We only contract with Adviser Companies who are Financial Advice Providers (FAPs) or Authorised Bodies (Adviser Company). Specified individual advisers who are accredited (accredited advisers), can help clients apply for insurance with PPS Mutual.

At PPS Mutual, we are committed to ensuring our customers and members have access to the best possible advice. We do this by partnering with a select group of independent advisers who have the knowledge, skill, and experience to serve the professional market well.

If you are one of our accredited advisers, this Adviser Handbook has been specifically prepared for you.

The purpose of this Adviser Handbook is to ensure that as an accredited adviser, you understand the obligations agreed to by your Adviser Company that directly impact you. There's unlikely to be any surprises here, but if there are, feel free to reach out to your Relationship Manager.

In addition to relevant policies, this Adviser Handbook will also provide more detail on accreditation, technology support, and marketing guidelines.

This Adviser Handbook may be updated from time to time, particularly if there is a change in legislation or if PPS Mutual makes an amendment to the Distribution Agreement.



# **Conduct expectations**

PPS Mutual has policies and processes in place to meet our conduct obligations as set out in our Fair Conduct Programme. These policies and processes include commitments about the way we distribute our products as required by the FMCA and in line with regulatory guidance. A summary of our Fair Conduct Programme can be found on our website.

Similarly, you and your Adviser Company have legal obligations in relation to your clients who purchase or apply for PPS Mutual products, and to ensure you have processes in place to meet those obligations. This means that we can rely on those processes to support fair outcomes in relation to the services that you provide to clients.

Under the Distribution Agreement, your Adviser Company has agreed to the below conduct expectations (**Conduct Expectations**) which you are required to comply with, and which also form part of our Fair Conduct Programme.

#### Each party will:

- conduct its business with integrity, professionalism, and due skill, care, and diligence in a manner that prioritises fair outcomes for clients;
- communicate with clients clearly and ensure that communications are reasonably accessible, including to clients with disabilities or specific accessibility needs;
- take reasonable steps to identify clients in vulnerable circumstances and manage the impact of those circumstances appropriately;
- treat clients, including those in vulnerable circumstances, equitably and with due consideration;
- actively manage any complaints or concerns raised by clients in relation to the products and services it provides to them;
- promptly pass on any complaints or concerns in relation to the other party's products and services raised by clients, accredited advisers or the parties' personnel, or arising from any data or trends;
- work together to investigate and address such complaints or concerns in a manner which ensures fair customer outcomes;
- take all reasonable steps to protect customers from the risks of financial crime;
- · where appropriate, collaborate to support our compliance with the Fair Conduct Principle; and
- treat the other with courtesy and respect. Neither party has any tolerance for discrimination, bullying, coercion or harassment.

#### In addition to the above, you will:

- where appropriate, provide clients with appropriate information about the risks of replacing or retaining their existing products and help clients to manage those risks;
- not offer prizes, gifts or other inducements in connection with a customer's decision to choose our products other than with our prior written approval;
- take reasonable steps to ensure clients do not make misrepresentations to us when they apply to take out, alter or reinstate a policy, and ensure that all relevant information disclosed to you is passed on to us;
- notify us immediately if you become aware of any change in the health, occupation or financial status
  of a client who is applying to take out, alter or reinstate a policy before that policy is issued, altered
  or reinstated;
- not receive or handle premiums or claims payments for any policy on behalf of clients other than
  your immediate family and ensure that any amounts that you receive in error are promptly passed on
  to the correct recipient;
- not use any part of a commission received in connection with a policy to pay any party associated with that policy;
- notify us immediately if you become aware of any suspicious activity (as defined in section 39A of the AML/CFT Act) relating to any client;
- not recommend our products to clients who are residing outside New Zealand or help them to apply for cover while they are outside of New Zealand.

#### Customers in vulnerable circumstances

Anyone can experience vulnerability at different points in their life, often in response to changes in health, significant life events, emotional or financial stress, or varying levels of knowledge and capability.

We recognise that our accredited advisers play a vital role in supporting customers during these times by providing guidance, empathy, and advocacy when it's needed most. We expect that you and/or your Adviser Company will have your own processes and procedures in relation to:

- · how to identify circumstances that result in customer vulnerability;
- · how to address the needs of customers experiencing vulnerability; and
- how to adapt your services when assisting customers who show evidence of vulnerability.

Our staff are also trained to identify signs of vulnerability and are empowered to offer enhanced support, flexibility, and discretion. This ensures customers are not unintentionally disadvantaged by processes or decisions that may not suit their individual circumstances.

If you believe that one of your clients may be experiencing vulnerability, please let us know. Together, we can work to uphold our mutual commitment to providing fair and thoughtful service.



# **Accreditation**

Only accredited advisers can recommend and help clients apply for insurance with PPS Mutual. To be accredited, advisers must:

- (a) pass any background checks we require;
- (b) complete required training relating to PPS and our products; and
- (c) acknowledge in writing that they have read, understood and will comply with this Adviser Handbook.

# Maintaining accreditation

To ensure you maintain your accreditation, you must:

- · comply with this Adviser Handbook and relevant obligations; and
- · complete required training and attend required seminars or meetings; and
- complete an annual attestation that the above has occurred.

#### Removal of accreditation

PPS Mutual may remove your accreditation if:

- · you do not comply with the above requirements; or
- you are incapacitated or otherwise unable to provide financial advice for a period of 30 days or more (unless you make alternative arrangements for affected clients); or
- if you pass away, are adjudicated bankrupt or undergo a no asset procedure under the Insolvency Act 2006.

PPS Mutual may temporarily suspend your accreditation while we investigate any suspected breach of the Distribution Agreement and/or the requirements set out in this Adviser Handbook.

#### What happens if an accreditation is removed or suspended?

- PPS Mutual will work with your Adviser Company to re-allocate clients to another servicing adviser, so the client can remain with the same Adviser Company. We will consult with you in relation to the re-allocation of your clients to the extent this is appropriate in the circumstances.
- If required, PPS Mutual will work with your Adviser Company to accredit new adviser(s) to service clients.
- If the above is not possible, your Adviser Company will work with affected clients to appoint a new
  accredited adviser from a different Adviser Company to be their servicing adviser. In this scenario,
  your Adviser Company will be responsible for agreeing any commercial arrangements with the new
  Adviser Company.

Your Adviser Company must ensure that appropriate arrangements for impacted clients are put in place within 30 days of any loss or suspension of your accreditation.

Unless and until appropriate arrangements have been put in place we may:

- suspend or delay commission payments for policies being serviced by you, to the extent reasonably necessary to cover any clawback in commission which may arise during that period; and
- remove, suspend or restrict your access to the Adviser Portal or require servicing of affected policies to be subject to additional checks or approvals.

# Moving to a "servicing-only" arrangement

Our service model relies on a small number of active relationships with Adviser Companies and accredited advisers. Accordingly, we will measure relevant performance metrics and regularly share these with you.

Where you do not:

- · submit a PPS Mutual application within 3 months of accreditation; and/or
- maintain an active, ongoing business relationship with us in accordance with any reasonable criteria applied by us,

We will work with you and your Adviser Company to understand the underlying causes. If those causes are within the reasonable control of you and/or your Adviser Company, we will work with you to agree an action plan to resolve this.

If you decline to participate in this process or any agreed action plan does not remedy the issues identified, we may transition you to a servicing-only arrangement by giving you reasonable notice.

Moving to a "servicing-only" arrangement means that:

- you will no longer be permitted to recommend our products to new clients, but you may continue to service your existing PPS clients (including helping them to increase, decrease or add cover); and
- · we will continue to pay commission in relation to the policies which you service.

You must still maintain your accreditation for servicing purposes even if you are moved to a servicing-only adviser.

Moving an adviser to a servicing-only relationship is not a decision that will be made lightly. Be assured that you and your Adviser Company will be involved through the process.



# **Our technology**

We believe that combining experienced people with seamless technology delivers an outstanding service experience.

Our Adviser Portal is designed to streamline routine tasks, while our knowledgeable team is here to provide a personal service experience for important matters, like underwriting or claims.

Once you have completed accreditation and we have received your attestation, you will be given access to the Adviser Portal.

As a paperless business, PPS Mutual relies exclusively on Adviser Portal for submitting new applications and servicing existing policies. You also have the option to submit claims through the portal.

Our goal is to ensure that our systems and processes are intuitive and easy to use. We'll provide training for you and your delegates, and if you ever need assistance, our Operations team is just a phone call away.

As a new insurer, our modern technology platform allows us to make enhancements relatively quickly and we appreciate any feedback that helps us serve you better.



# **Accreditation**

## **Delegate access to the Adviser Portal**

PPS Mutual can set up "delegate access", which will give your support staff access to your Adviser Portal profile to submit applications, check progress of applications, update contact or policy details, and perform other servicing and administration tasks.

Delegate access provides unrestricted access to your profile and your delegate will be able to view and action everything within the Portal. As the accredited adviser, you are responsible for any action your delegate takes in the Adviser Portal.

Support staff may be set up as delegates for multiple accredited advisers. The system will allow them to toggle between accredited advisers and their own profile. The system does not currently allow for a single merged view.

To maintain security, accredited advisers and delegates must not share login credentials under any circumstances.

If a delegate leaves your business or if you need to remove their access, it is your responsibility to notify us. We encourage you to do this as soon as possible. You can do so by contacting our Operations team.

## **Training your support staff**

Where you have approved a member of your support staff to have delegate access to the Adviser Portal on your behalf, they will be given training on how to use the Adviser Portal by a member of our Distribution or Operations team.

Delegates will also have full access to the Adviser Hub and the video Quick Guides, providing easy to follow guidance on completing specific tasks. Delegates can also access additional support at any time from either their Relationship Manager or the Operations team.

# **Security**

We help protect both your data and your clients' data with simple, effective security measures:

- Company email addresses All Adviser Portal accounts must be linked to a company email address.
   This adds an extra layer of security, particularly if a delegate leaves your business before their access is removed.
- Password requirements All passwords must meet our security standards, including specific formatting criteria.
- **Multi-factor authentication** To help secure your Adviser Portal profile, we may occasionally require you to authenticate your login using email verification.

# Confidentiality and privacy

#### Handling your client data

As part of your own business processes, you will already be aware of how to handle your clients' data and your obligations under privacy legislation.

Below are our expectations, to help with protecting your clients' data:

- Ensure you don't leave the Adviser Portal open on an unattended laptop or tablet in a public area. Please don't share your Adviser Portal credentials with your support staff or other advisers (particularly if they are not accredited to service PPS Mutual products).
- Ensure that you attach the correct documents to a life insured's application, making sure they're not for another client.

#### How we handle your data

Our modern digital systems are built and housed in cloud infrastructure, with servers located in Australia and New Zealand.

Your personal data (that's provided to us during the onboarding process) is stored in an encrypted database, and only accessible by the distribution and operations team.

Click to view our <u>Privacy Policy</u> on the PPS Mutual website which sets out in detail how we handle, use and protect personal information.



# Feedback and complaints

#### Feedback from accredited advisers

We genuinely value your feedback. Your feedback helps us to deliver products and services that meet your clients' needs, and we strive to make it easier for you to do business with us. We will seek your feedback in relation to our products and services, which may include panel discussions or similar forums. We encourage you to provide full and honest feedback to foster collaboration and help us identify areas for improvement.

From time-to-time, there may be a need for us to change or withdraw products from sale, introduce new products, or alter our services, processes and underwriting rules. As a general rule, we will endeavour to seek your feedback before doing so.

#### Complaints from customers and members

As a mutual insurer, we work hard for our customers and members. There might be times when we get things wrong, and we want to know about them so we can make things right. We will take all reasonable steps to resolve any complaint and will review complaints with openness, empathy, and transparency.

PPS Mutual has a Complaints Management Policy and all complaints will be dealt with in accordance with our policy. Under our policy, we define a complaint as "an expression of dissatisfaction relating to a product or service, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected."

Your clients can raise complaints directly with PPS Mutual by:

Email: support@ppsmutual.co.nz

When a complaint is received by PPS Mutual, a dedicated person will be assigned to manage the issue through to resolution. We will acknowledge receipt of the complaint within five business days and will provide:

- Contact details of the person or department responsible for the complaint
- Indicative timelines for resolving the complaint
- Information about the internal escalation process, should the customer be dissatisfied with the outcome; and
- Information about the external escalation process to the Insurance & Financial Services Ombudsman (IFSO) for independent review.

If we are unable to resolve your client's complaint internally, they may be referred to the IFSO once we issue a letter of deadlock. IFSO is a free and independent complaints resolution service available to PPS Mutual customers.

For more information, or to access the IFSO process: Call 0800 888 202 or visit ifso.nz

## Complaints made by accredited advisers

If an interaction that you or your support staff have had with PPS Mutual results in you needing to provide feedback or lodge a complaint, including where you believe we have not complied with our regulatory or contractual obligations, you can do this through your Relationship Manager, or directly to the Chief Distribution Officer.

All complaints made by accredited advisers will be dealt with in accordance with our policy, and the process set out in the section above will be followed. This policy is available by requesting it from PPS Mutual.

#### Complaints made about accredited advisers

We will treat you and your support staff with courtesy and respect, and we expect our staff to be treated the same by you and your support staff. Inappropriate behaviour and/or language towards PPS Mutual staff will not be tolerated.

If an interaction that you or your support staff have had with a PPS Mutual staff member has resulted in a complaint being made about you or your Adviser Company, your Relationship Manager or the Chief Distribution Officer will be in touch.

If we receive a complaint from one of your clients about you or your office, your Relationship Manager or the Chief Distribution Officer will be in touch with next steps. All complaints made by customers or members about accredited advisers or their teams will be dealt with in accordance with our policy, and the process set out in the section above will be followed.

#### Availability of whistleblower channels

If you're not comfortable raising concerns through our complaints process, there are whistleblower channels available that ensure confidentiality and protection.

You can choose to remain anonymous, but it's better to disclose your identity to help with investigations.

PPS is committed to taking your concerns seriously and supporting you through the process.

You can speak up by contacting Incident Response Solutions through the following whistleblower channels:

**Phone:** 0800 TIPOFF (0800 847 633)

Email: pps@whistleblowers.co.nz

Web form: whistleblowers.co.nz/pps (password "pps")

Post:

Whistleblowers Service Incident Response Solutions Ltd PO Box 1946, Shortland St

Auckland, 1140



# Use of the PPS brand and collateral

As a partner of PPS Mutual, we permit accredited advisers (and their Adviser Company) to use our branding for advertising and marketing. However, we do have guidelines around how our marketing materials are able to be used, and PPS Mutual must approve (in writing) the use of the PPS brand.

To seek approval to use the PPS Mutual branding: Please contact our marketing lead Cherie Wright on cwright@ppsmutual.co.nz

Approval to use branding or marketing material will be revoked if an adviser's accreditation is removed, and they become a servicing-only adviser.



## Mutual assurance

PPS Mutual and your Adviser Company have an obligation to ensure the advisers that PPS Mutual chooses to do business with have the knowledge, skill and competence to distribute PPS's products and comply with the Conduct Expectations. Given the quality of accredited advisers we are choosing to work with, we do not expect this to cause any challenges, but you should we aware that our Relationship Managers will review the following on a regular basis:

- Underwriting feedback: quality of applications and disclosures, and appropriateness of covers and limits (where reviewable)
- Claims: accuracy of disclosures and appropriateness of covers
- · Customer feedback: outbound requests for feedback from Customers
- Complaints: inbound complaints from Customers, requests by Customers to move adviser and complaints / feedback from PPS staff
- Persistency: regular movement between providers and / or lapse and cancellation of covers
- Thematic trends across qualitative issues

Any concerns will be addressed with you directly (unless serious in nature), transparently and in a timely manner.

We also expect that you and/or your Adviser Company will provide us with any complaints, concerns or relevant feedback in relation to our products and/or services. Please refer to section 6 above.



