

CIL Family Violence Policy

Purpose and scope

Commonwealth Insurance Limited ('CIL') is a wholly owned subsidiary of Commonwealth Bank of Australia ('CBA'). CIL sells its general insurance products across retail and digital distribution channels within the CBA Group, including Bankwest.

CIL recognises that the safety of Customers affected by Family Violence is of paramount importance.

This Policy sets out CIL's principles and forms part of the overall CIL and CBA framework to minimise the risk of harm in interactions with Customers affected by Family Violence.

For the Purposes of this Policy, Family Violence is defined as violent, threatening or other behaviour by a person that coerces or controls a member of the person's family or causes the family member to be fearful. It includes physical abuse, emotional abuse, psychological abuse, sexual abuse, financial or economic abuse and damage to property.

This policy applies to CIL Employees, Contractors, and Distributors.

CIL operates within the Australian domestic retail market and as a result is subject to Australian Law, Regulations, Prudential Standards and relevant industry codes.

Policy statement

CIL is committed to ensuring our interactions with those affected by Family Violence are conducted in a way that minimises the risk of harm, and provides for timely, consistent and targeted assistance.

Policy Requirements

Recognising Family Violence	In order to protect the safety of Customers and minimise the risk of harm, CIL Employees, Contractors, and Distributors must have the necessary skills and expertise as relevant to their role to enable recognition of signs that may indicate a Customer is being affected by Family Violence.
Employee/Distributor Training	CIL will ensure that its Employees, Contractors, and through its agreement with Distributors, employees of Distributors, are provided with the necessary training, skills and expertise as relevant to their role, to interact with Customers impacted by Family Violence.
Protection of customer information	CIL Employees, Contractors, and Distributors must adhere to the requirements of the CBA Privacy Policy that provides for the protection of personal and Customer sensitive information, against loss; or unauthorised access, use, modification or disclosure.
Claims Handling and Disclosure Information	Where Employees, Contractors, or Distributors recognise signs of or are made aware that a Customer is affected by Family Violence, appropriate steps must be taken to ensure that the claim is handled sensitively and that the Customer is not put in a position where they are required to repeatedly disclose the circumstances of their Family Violence situation.

Collection arrangements	Where a third party is undertaking collection activity on CIL's behalf, CIL will work with the third party in situations that may involve Family Violence to ensure the claim is handled sensitively.
Information and assistance	<p>CIL Customers affected by family violence will be provided with information on how to access financial hardship assistance through all Customer Channels.</p> <p>A copy of this Policy, linkages to information on specialist services and programs provided by the CBA, how to access financial hardship assistance and contact details for recognised external services will be available on the CBA website to assist Customers affected by Family Violence.</p>
Supporting Employees and Distributors	<p>CIL recognises that Family Violence may also affect Employees, Contractors, and Distributors, either through interactions with Customers, or through personal circumstances including where they or a family member may be affected. CIL also recognises that Employees, Contractors, or Distributors employees may be perpetrators of Family Violence.</p> <p>All Employees, Contractors, and employees of Distributors are given access to the CBA Employee Assistance Program that provides a professional, confidential short-term counselling service for permanent employees and their immediate families who face personal, family or employment related concerns.</p> <p>A manager hotline also provides advice to managers, team leaders and Human Resources Support.</p>
Risk Reporting	Any identified General Insurance Code of Practice breaches will be recorded in RiskInSite and managed and reported in line with the requirements of the CBA Group Compliance Incident Standard.
Record Keeping and artefacts	CIL's Employees and Contractors education and training records must be kept for at least 7 years. CIL will make those records available to the Code Governance Committee at its request. CIL requires Distributors to do the same.

Accountabilities

Roles and responsibilities under this Policy are set out below.

Role	Accountabilities
CIL Board	<ul style="list-style-type: none"> Initial approval of this Policy.
CIL Board Risk Committee (BRC)	<ul style="list-style-type: none"> Reviews and approves this Policy on a triennial basis or in the interim where material changes are recommended by the Managing Director, CIL.
Managing Director, CIL	<ul style="list-style-type: none"> Approves non-material changes to this Policy. Recommends material changes to this Policy to the Board Risk Committee.
General Manager, General Insurance (Line 1)	<ul style="list-style-type: none"> Reviews this Policy annually to identify whether material changes are required. Recommends this Policy to the Managing Director, CIL for approval of non-material changes or for

	<p>endorsement to the BRC where material changes are required.</p> <ul style="list-style-type: none"> • Creation and maintenance of processes and procedures to implement this Policy. • Annual review of this Policy.
--	--

Compliance statement

CIL is an authorised general insurer and a subscriber to the General Insurance Code of Practice 2020.

The Policy forms part of CIL's and CBA's Framework for dealing with Vulnerable Customers including those affected by Family Violence and supports CIL's compliance with the General Insurance Code of Practice 2020.

Breach of policy

Consequences Breach of this policy may be regarded as misconduct, which may lead to disciplinary action (including termination of employment or engagement).

Escalation Potential or realised breaches of obligations outlined in this policy must be escalated according to the Group Issue Management Standard or Group Compliance Incident Standard.

Definitions

In this policy, defined terms are capitalised. Those terms have the meaning given to them below.

Contractors Individuals who are not Employees, and corporations or organisations, engaged by the Group to perform services for the Group.

Customer Individual or potential individual insured, third party beneficiary, or an individual that CIL is seeking to recover money from.

Customer Channels Commonwealth Bank Group Call Centres, Website (including webchat) and Retail Branches (including Bankwest).

Distributor CBA Group including Bankwest.

Employees Full-time, part-time and casual employees of the Group who interact with CIL Customers.

Family Violence Violent, threatening or other behaviour by a person that coerces or controls a member of the person's family, or causes the family member to be fearful. It includes:

- Physical abuse, emotional abuse, psychological abuse, sexual abuse, financial or economic abuse; and
- Damage to property

Vulnerable Customer Any Customer experiencing vulnerability due to any circumstances including age, disability, mental health conditions, physical health conditions, family violence,

language barriers, cultural background, Aboriginal or Torres Strait Islander status, remote location or financial distress.

Policy governance

Approver	CIL Board
Exemption Authority	Managing Director, CIL Board
Owner	Executive General Manager, responsible for CIL
Support	CIL Risk Management (Line 2)
Review Cycle	Annual

Relevant documents

Related internal documents	Group Internal Privacy Policy
	Group Information Security Policy
	Group Compliance Incident Management Standard
	Group Issue Management Standard
	Group Policy Framework Glossary
External sources of obligations and references	Family Law Act 1975 (Cth)
	General Insurance Code of Practice 2020
	Guide to Helping Customers Affected by Family Violence- January 2020 -Insurance Council of Australia
	Disability Discrimination Act 1992 (Cth)

Material revisions

Version	Approval Date	Effective Date	Details
1.0	11 March 2020	1 July 2020	CIL Board Approval
2.0	April 2021	27 April 2021	Policy aligned to the requirements of the Group Policy Framework Related Internal Document references and External obligation references updated