

# Fair Conduct Programme Summary

American Income Life Insurance Company (**AIL**) has a Fair Conduct Programme which is designed to ensure its consumers are treated fairly when AIL deals or interacts with consumers in relation to their life insurance contracts and when designing, offering and providing AIL's insurance related services and life insurance contracts to consumers (**AIL's Services**).

Key features of AIL's Fair Conduct Programme Summary	
<b>What is the Fair Conduct Principle?</b>	<p>The Fair Conduct Principle is that financial institutions must treat consumers fairly, including (but not limited to):</p> <ul style="list-style-type: none"><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 AIL 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>
<b>How AIL will comply with the Fair Conduct Principle</b>	<p>To meet the Fair Conduct Principle, AIL takes reasonable steps to comply with its Fair Conduct Programme. AIL's Fair Conduct Programme requires:</p> <ul style="list-style-type: none"><li>• <b>Employees and agents:</b> AIL's employees and agents who are involved in providing AIL's consumer insurance services are expected to be familiar with, and take all reasonable steps to follow, AIL's Fair Conduct Programme. AIL monitors their compliance and operates an FCP training programme which consists of initial and ongoing training to ensure that employees (and agents) understand the requirements of AIL's Fair Conduct Programme and AIL's consumer insurance services and consumer insurance contracts. Employees and agents are also expected to follow AIL's communication guidelines which ensures customers receive timely, clear, concise and effective communications and, if a customer is vulnerable, to treat them in accordance with AIL's Vulnerable Customer Policy.</li><li>• <b>Intermediaries:</b> AIL of New Zealand Limited (<b>AILNZ</b>) is the sole distributor of AIL's services in New Zealand. AILNZ is a licensed financial advice provider in New Zealand and has various duties and obligations to AIL's consumers that overlap with and support the Fair Conduct Principle (such as the requirement to treat retail clients fairly under the Code of Professional Conduct for Financial Advice Services). AIL takes reasonable steps to ensure and confirm that AILNZ's distribution methods operate consistently with the Fair Conduct Principle.</li><li>• <b>FCP Compliance Assurance Programme:</b> Under AIL's FCP Compliance Assurance Programme, AIL reviews its business 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. AIL also has compliance processes which are designed to ensure AIL meets its legal obligations to consumers. AIL's New Zealand life insurance services and contracts are designed, managed, governed and regularly reviewed for consistency with the fair conduct principle.</li><li>• <b>Risk Management:</b> AIL has policies, processes and controls in place to identify and manage the conduct risk (for example, the risk that</li></ul>

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	<p>AIL's conduct fails to meet the Fair Conduct Principle). AIL's Fair Conduct Programme clearly specifies the roles, responsibilities, and accountability arrangements in relation to identifying, monitoring, and managing those risks and requires reporting on those risks and any failures to AIL's New Zealand Advisory Committee.</p> <ul style="list-style-type: none"><li>• <b>Governance:</b> AIL's New Zealand Advisory Committee is responsible for the Fair Conduct Programme. AIL has implemented an internal governance and reporting structure to appropriately manage and oversee AIL's New Zealand business and the operation of its Fair Conduct Programme and to seek assurances of its employee capability and compliance with the Fair Conduct Programme, including disciplining employees when there are breaches. AILNZ's board also reports to AIL on a regular basis.</li><li>• <b>Fair Conduct Programme Review:</b> AIL's Fair Conduct Programme is subject to regular review to test its operation and effectiveness. Where a deficiency in the Fair Conduct Programme is identified, AIL has procedures in place to promptly remediate the deficiency and ensure AIL's continued compliance with the Fair Conduct Principle.</li></ul>
<b>Contact Details</b>	<p>This description is designed to assist consumers make informed decisions about their dealings and interactions with AIL in relation to AIL's consumer insurance services. For more information, consumers can contact AIL at <a href="https://pos.ailife.com">pos.ailife.com</a>.</p>
<b>Complaints process</b>	<p>Consumers can make a complaint about AIL's services and associated products by following the complaints process <a href="https://www.ailife.com/complaint-process">https://www.ailife.com/complaint-process</a>.</p> <p>If AIL receives a complaint from a consumer, AIL will use reasonable endeavours to deal with that complaint in accordance with its complaints procedures and policy. In addition to ensuring AIL responds to complaints in compliance with the Fair Conduct Principle, AIL also has appropriate oversight of AILNZ's complaints procedures and policy.</p>

Last updated: [31 March 2025]