

Client Rights and Product & Service Risk Disclosure Policy

1. Purpose

This Policy establishes the principles and minimum requirements for ensuring that clients are informed of their rights, responsibilities, and the key risks associated with the products and services provided by the Company.

The Company is committed to providing clients with clear, accurate and understandable information to enable them to make informed decisions regarding the products and services they choose. The Company shall provide appropriate information on material terms, conditions, limitations and risks before or at the time a product or service is provided and throughout the relationship where material changes occur.

2. Scope

This Policy applies to all employees, business units, branches and functions involved in the design, marketing, sale, delivery, administration or support of products and services to clients.

It applies throughout the client relationship, including:

- Product or service enquiry;
- Onboarding and contracting;
- Product or service selection;
- Delivery and use of the product or service;
- Changes to material terms or conditions; and
- Complaints, disputes and termination of services.

3. Client Rights

The Company recognises and respects the following fundamental client rights:

3.1 Right to Fair and Non-Discriminatory Treatment

Clients have the right to receive products and services fairly and without unlawful discrimination based on characteristics such as age, disability, race, religion, gender, marital status, national origin or other protected characteristics under applicable law, subject to applicable laws and legitimate product or service requirements.



3.2 Right to Clear and Adequate Information

Clients have the right to receive sufficient, accurate and reasonably understandable information about the products and services offered to them.

Information provided shall, where applicable, include:

- Nature and purpose of the product or service;
- Key features and benefits;
- Fees, charges and other costs;
- Contractual terms and conditions;
- Eligibility requirements;
- Key limitations, exclusions and restrictions;
- Material risks and potential adverse consequences;
- Applicable cancellation, termination or refund conditions; and
- Procedures for complaints or seeking assistance.

The Company shall avoid misleading, incomplete or unnecessarily complex information that could prevent clients from making informed decisions.

3.3 Right to Make an Informed Decision

Clients have the right to make their own decision regarding whether to purchase, use, continue or terminate a product or service after receiving relevant information.

Where a product or service involves material risks, the client should be given sufficient information to understand those risks before making a decision.

3.4 Right to Privacy and Confidentiality

Clients have the right to reasonable privacy when providing personal or confidential information.

Client information shall be handled confidentially and disclosed only:

- With the client's consent;
- For legitimate business purposes in accordance with applicable laws and Company requirements; or
- Where disclosure is required or permitted by law.

3.5 Right to Access Relevant Information

Clients have the right to request access to relevant information concerning their products, services, transactions and contractual arrangements, subject to applicable legal and confidentiality requirements.

3.6 Right to Raise Concerns and Complaints

Clients have the right to raise questions, concerns or complaints regarding products and services without unreasonable barriers or retaliation.



The Company shall maintain appropriate channels for receiving, recording, investigating and resolving client complaints.

3.7 Right to Seek Clarification

Clients have the right to request clarification where information concerning a product, service, contract, fee, condition or risk is unclear or not understood.

Employees shall provide reasonable assistance or refer the client to an appropriate person or function where further explanation is required.

4. Disclosure of Product and Service Risks

The Company shall identify and, where relevant to the client and the product or service, disclose material risks associated with its products and services in a manner appropriate to the nature and complexity of the product or service.

Risk disclosure shall be:

- Clear and understandable;
- Accurate and not misleading;
- Provided in a timely manner;
- Proportionate to the level of risk and complexity;
- Consistent with approved product documentation; and
- Provided before the client makes a material decision where reasonably practicable and appropriate to the nature of the product or service.

4.1 Key Risk Categories

Depending on the product or service, relevant risks may include:

Financial Risk

Potential loss of money, additional costs, penalties, price changes, payment obligations or other financial consequences.

Contractual and Compliance Risk

Risks arising from failure to comply with contractual terms, conditions, warranties, obligations or restrictions.

Operational Risk

Potential disruption, delay, service failure or other operational issues affecting the delivery or use of the product or service.

Occupational Health and Safety Risk

Potential injury, damage or other physical consequences associated with the use of a product or service, where applicable.

Data Protection & Privacy Risk



Potential risks associated with the collection, processing, storage or disclosure of personal or confidential information.

Service Quality Risk

Circumstances in which the product or service may not be available, may not meet the client's expectations, or may be subject to limitations, exclusions or conditions.

Sourcing Risk

Risks arising from third parties involved in providing, supporting or delivering the product or service.

Legal & Regulatory Risk

Potential consequences resulting from changes in applicable laws, regulations, licensing requirements or other legal obligations.

The applicable risks shall be determined based on the nature of each product or service and should not be presented as an exhaustive list where additional material risks exist.

5. Client Responsibilities

Clients are expected to provide complete and accurate information reasonably required for the Company to provide the relevant product or service.

Clients are generally expected to do the followings:

- Reading and understanding relevant terms and conditions;
- Providing accurate and timely information;
- Asking questions where information is unclear;
- Complying with applicable contractual requirements;
- Following reasonable instructions relating to the safe and proper use of products or services;
- Making required payments within agreed timeframes; and
- Informing the Company promptly of relevant changes or problems.

The client remains responsible for decisions made after receiving the relevant information and disclosures, including where the client chooses not to follow applicable instructions or contractual requirements.

6. Product and Service Information

Before providing a product or service, the responsible business unit shall ensure that appropriate client-facing information is available.

Where relevant, this information should include:

1. Product/service description;
2. Intended purpose and key features;



3. Eligibility or suitability requirements;
4. Pricing, fees and charges;
5. Material terms and conditions;
6. Key risks;
7. Important exclusions and limitations;
8. Client obligations;
9. Cancellation, termination or refund arrangements; and
10. Contact and complaint channels.

Any material changes to products, services, fees, conditions or risks shall be communicated to affected clients within a reasonable timeframe and in accordance with contractual and regulatory requirements.

7. Communication Standards

Client communications shall be presented in language that is reasonably understandable and appropriate to the intended client, including translation or interpretation where required by law or reasonably necessary.

Employees shall not:

- Misrepresent the features or benefits of a product or service;
- Conceal or minimise material risks;
- Provide inaccurate or outdated information;
- Make promises, representations or guarantees that have not been approved;
- Apply inappropriate pressure to clients to purchase a product or service; or
- Omit material limitations or conditions that could reasonably affect the client's decision.

Marketing and promotional materials shall be consistent with approved product information and shall not contradict the formal terms and conditions of the product or service.

8. Acknowledgement and Record Keeping

Where appropriate based on the nature and risk of the product or service, the Company may obtain acknowledgement from the client that relevant information, terms, conditions and material risks have been provided or made available.

The responsible business unit shall retain appropriate records, in accordance with applicable laws and the Company requirements, of:

- Information provided to the client;
- Relevant terms and conditions;
- Risk disclosures;
- Client acknowledgements, where applicable;
- Material communications; and



- Complaints and their resolution.

Records shall be maintained in accordance with the Company's applicable record retention requirements.

9. Roles and Responsibilities

Business Units

Business units are responsible for:

- Identifying material risks associated with their products and services;
- Ensuring appropriate client disclosures are prepared and maintained;
- Providing accurate information to clients; and
- Ensuring employees are trained on the relevant products, services and risks.

Employees

Employees dealing directly with clients shall:

- Provide accurate and complete information;
- Explain material terms, conditions and risks where required;
- Treat clients fairly and respectfully;
- Protect client confidentiality; and
- Escalate complex questions, complaints or issues to the appropriate function.

Risk/Compliance Function

The Risk/Compliance function shall provide appropriate oversight and advice, within its responsibilities, on material client-related risks, disclosure requirements and compliance with applicable internal policies and regulatory requirements.

10. Complaints and Escalation

The Company shall maintain appropriate mechanisms for clients to submit complaints or concerns.

Complaints shall be:

- Received through accessible channels;
- Recorded appropriately;
- Investigated objectively;
- Addressed or resolved within applicable timelines and without retaliation; and
- Escalated where the matter is material, unresolved or indicates a broader product, service or conduct risk.

Material or recurring complaints should be reviewed to identify potential weaknesses in products, services, processes or client disclosures.



11. Monitoring and Review

The Company shall periodically review the effectiveness of this Policy and the adequacy of client disclosures.

Reviews should consider:

- Client complaints and feedback;
- Regulatory or legal developments;
- Changes to products and services;
- Material incidents or losses;
- Identified conduct or operational risks; and
- Whether clients are receiving sufficient information to make informed decisions.

This Policy shall be reviewed periodically and updated where necessary to reflect changes in the Company's products, services, risks and applicable requirements.

12. Policy Statement

The Company is committed to ensuring that clients are treated fairly, provided with appropriate information, and given a reasonable opportunity to understand the products and services they receive. The Company shall seek to ensure that material risks, limitations, costs and client responsibilities are communicated clearly and in a timely manner so that clients can make informed decisions.