

## 1. **Objective**

The Close Monitoring program ("CM") is an MAS recommended tool imposed on representatives with adverse records or have committed some form of misconduct. Since 01 Jun 2015, the MAS has also strongly recommended PIAS that all Representatives who joined us with an adverse record be placed on a minimum 3 months CM program.

## 2. **Representative under CM Programme**

A Representative will be placed under CM Programme if:

- He/she has adverse records via reference checks at the point of on-boarding
- Existing Representative who is the subject of a complaint that is substantiated; OR
- Proposed by the Authorities to be placed under monitoring
- Company will place individuals/existing Representatives under CM program when deem necessary

### 2.1 **Procedure:**

Head of RM&C will inform in writing via a formal letter regarding the commencement and duration of the CM program to the following:

- 1) Affected Representative;
- 2) Financial Services Director;
- 3) Financial Services Manager,
- 4) Head of Business Development; and
- 5) Head of Operations

The duration of CM programme is minimum of 3 months depending on the severity of the adverse records/misconduct. RM&C will review on a case-by-case basis to recommend the required monitoring period.

## 3. **Supervisor's Responsibility for Representative under CM Programme**

Supervisors will be responsible for the closely monitoring of the Representative(s) activities. Besides the usual monitoring of his/her conduct of financial advisory activities, as stated in our Training & Competency Plan.

### 3.1 **Supervisor's Role:**

1. Review of the fact-find and needs analysis reports prepared by the Representatives for the clients
2. Review of the Representative's basis of recommendations to the client(s) on recommended products before the transaction is executed.
3. Supervisor shall perform pre-transactional call back to clients and complete the Pre-transactional call back forms accordingly. Client call-back is required to be conducted as soon as possible and no later than 7 business days (for CIS) or 14 business days (for all life policies) upon receipt of document from Representative.

Completed client call back forms are required to be submitted to Business Support department for scanning.

4. Supervisor shall accompany Representative under CM, regardless of experience, for a minimum of 5 closed sales and to document details in the one-to-one coaching form.

Completed coaching forms are required to be scanned and emailed to RM&C department at the end of CM duration. The original copies are to be retained by the Supervisor and filed in the Representative's personal file.

5. Close monitoring of Representatives' sales activities to ensure there is no improper switching

## Call-Back Requirement based on duration of Close Monitoring Program

<u>Duration of CM Program</u>	<u>Call-Backs Requirement</u>	<u>Action By Supervisor</u>
<b>3-Mths CM</b>	1 <sup>st</sup> to 3 <sup>rd</sup> Month	100% Client Call Back
<b>6-Mths CM</b>	1 <sup>st</sup> to 3 <sup>rd</sup> Month	100% Client Call Back
	4 <sup>th</sup> to 6 <sup>th</sup> Month	1 in 2 Clients to be called (i.e. 50% Call Back)
<b>12-Mths CM</b>	1 <sup>st</sup> to 3 <sup>rd</sup> Month	100% Client Call Back
	4 <sup>th</sup> to 6 <sup>th</sup> Month	1 in 2 Clients to be called (i.e. 50% Call Back)
	7 <sup>th</sup> Month and above	1 in 4 Clients to be called (i.e. 25% Call Back)

## RM&C Review

RM&C will conduct BSC audit on Representative and conduct sample checks to ascertain that client call backs have been conducted. At the end of the CM program, RM&C will assess to ensure that all CM requirements stated above are met.

## Disciplinary Actions

Supervisor has the responsibility to ensure that the Representative(s) that is put on the CM program adhere to the requirements set out. Supervisor will also need to ensure that proper documentation and checks are performed. Failure to comply with the requirements, disciplinary action(s) will be as follows:

	<b>Pre-transactional Call-backs to Client(s)</b>	<b>Joint-Field Work</b>
<b>1<sup>st</sup> Failure</b>	1 <sup>st</sup> Letter of Advice	1 <sup>st</sup> Letter of Advice
<b>2<sup>nd</sup> Failure</b>	1. 2 <sup>nd</sup> Letter of Advice	1. 2 <sup>nd</sup> Letter of Advice
	2. Re-Monitoring of the Representatives for an additional period of time (Duration will be determined by the Management)	2. Re-Monitoring of the Representatives for an additional period of time (Duration will be determined by the Management)
<b>3<sup>rd</sup> Failure</b>	1. 1 <sup>st</sup> Letter of Warning	1. 1 <sup>st</sup> Letter of Warning
	2. Suspension of new recruitment for 1 month	2. Suspension of new recruitment for 1 month
	3. Lodgement of MRS will be performed	3. Lodgement of MRS will be performed