

PIAS

CROSS BORDER GUIDE

This document provides guidance to PIAS Representatives in cross border client engagement and business. The requirements within this Guide are based on Singlife's Group Cross Border Policy and adapted for PIAS implementation and usage. The content within this Guide is subject to change from time to time to align with any relevant updates or changes to Group Cross Border Policy, processes and regulatory landscape.

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You are required to return to PIAS this Policy along with any other materials provided by PIAS in the event if you are no longer with the company.

Ver. No.	Change Summary	Change Owner	Released
1-2024	Release of PIAS Cross Border Guide	RM&C	Feb 2024
2-2024	Updates to include other product providers and investment platforms	RM&C	Dec 2024

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1. Introduction

Singapore Life Holdings Pte Ltd (“Singlife”) issued the Group Cross Border Policy (“Policy”) in October 2023 setting out the minimum requirements that the Singlife Group, including PIAS, needs to meet to ensure that risks associated with cross border client engagement and business is controlled and managed to an appropriate degree of materiality.

As an extension of the Policy, this PIAS Cross Border Guide sets out further guidance in the conduct of cross border client engagement activities by PIAS Representatives for offshore clients. In the context of PIAS, cross border client engagement activities refer to any dealings or interactions with one or more clients for the purposes of facilitation, provision and execution or post-execution support of policy application, account opening and policy/account maintenance activity, including investment accounts and transactions. An offshore client refers to a client who is engaged in a different location/jurisdiction from Singapore, by a PIAS representative who is located in Singapore. All business transactions must take place while the PIAS representative is within the Singapore jurisdiction.

For the avoidance of doubt, offshore client does not include a client who is temporarily located overseas for vacation, short-term work assignments or other purposes, for a period of not longer than 183 days. For such a client to be considered located overseas temporarily and hence out-of-scope of this Cross Border Guide, the client’s place of residence has to be in Singapore.

2. In-scope Product Providers / Investment Platforms / Products

Please refer to table below for a summary of the eligibility requirements by the respective in-scope product providers and investment platforms.

S/N	Insurer	Accredited Investor (AI) only	Either OR			Country of Residency					
			Annual Income	Net Personal Assets	Net Financial Assets	Malaysia	Indonesia	Thailand	China	Taiwan	Hong Kong
1	Singlife	No	S\$120,000 and above	S\$200,000 and above	S\$200,000 and above	Yes	Yes	Yes	Yes	Yes	Yes
2	China Life	Yes	S\$300,000 and above	S\$2,000,000 and above	S\$1,000,000 and above	Yes	Yes	Yes	Yes	Yes	Yes
3	ETIQA	No	Not Stated	Not Stated	Not Stated	Yes	No	Yes	No	No	No
4	Transamerica	Yes	S\$300,000 and above	S\$2,000,000 and above	S\$1,000,000 and above	Yes	Yes	Yes	Yes	Yes	No

S/N	Investment Platform	Accredited Investor (AI) only	Either OR			Country of Residency					
			Annual Income	Net Personal Assets	Net Financial Assets	Malaysia	Indonesia	Thailand	China	Taiwan	Hong Kong
1	Navigator / GROW with Singlife	No	Not Stated	Not Stated	Not Stated*	Yes	Yes	Yes	Yes	Yes	Yes
2	iFAST	No	Not Stated	Not Stated	Not Stated	Yes	Yes	Yes	Yes	Yes	Yes

* For Navigator / GROW with Singlife, while there are no minimum wealth criteria, please note that investment amounts of S\$350,000 and above would be subject to Source of Wealth checks by Navigator / GROW with Singlife.

The products in-scope are as follows:

Insurers

Singlife

Protection	Savings and Investments [^]								
<p>Singlife Elite Term II</p> <p>+ Riders:</p> <ul style="list-style-type: none"> • TPD Advance Cover Plus II • CI Advance Cover Plus III <table border="1"> <thead> <tr> <th>Component</th><th>Maximum Sum Assured (per life)</th></tr> </thead> <tbody> <tr> <td>Death</td><td>\$10,000,000</td></tr> <tr> <td>TPD</td><td>\$2,000,000</td></tr> <tr> <td>CI</td><td>\$1,000,000</td></tr> </tbody> </table> <p><i>Not applicable to the following riders:</i> Critical Illness Premium Waiver II, MultiPay Critical Illness Cover IV, Early Critical Illness Cover II, Singlife Big 3 Critical Illness cover, Payer Critical Premium Waiver II and Payer Premium Waiver benefit.</p>	Component	Maximum Sum Assured (per life)	Death	\$10,000,000	TPD	\$2,000,000	CI	\$1,000,000	<ul style="list-style-type: none"> • Singlife Savvy Invest II • Singlife Flexi Life Income II • Singlife Choice Saver • Singlife Legacy Income • Singlife Steadypay Saver • Singlife Legacy Indexed Universal Life <p><i>^Base plan only, no riders allowed.</i></p> <p><i>Not applicable to the following base plan: Singlife Flexi Retirement II</i></p>
Component	Maximum Sum Assured (per life)								
Death	\$10,000,000								
TPD	\$2,000,000								
CI	\$1,000,000								

China Life

Guaranteed issuance insurance plans	
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Etiqua

Invest Builder Plan	
Invest Smart Flex Plan	

Transamerica

Life Insurance Plans	
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Investment Platforms

Navigator / GROW with Singlife

All investment products available to PIAS	
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iFAST

All investment products available to PIAS	
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3. Selected Countries

The selected countries to which the Group Policy and this Guide will apply are:

- a) Malaysia
- b) Indonesia (Major Cities)¹
- c) China (Major Cities)
- d) Taiwan
- e) Hong Kong
- f) Thailand

3.1 Major Cities

China Major Cities
All except Tibet & Xinjiang
Indonesia Major Cities
Bali, Bandung, Jakarta, Makassar, Medan, Pontianak, Semarang, Surabaya, Yogyakarta

Note: Cities not mentioned in the above table fall under Non-Major Cities. This is subject to the Declined Residency below:

3.2 Declined Residency

Declined Cities/Provinces[^] - Indonesia
Central Sulawesi, Maluku, Papua, West Papua

[^] Any cities of Indonesia which are not mentioned in Table 3.2 can be covered.

For Etiga only

Please refer to the below list of Declined Cities / Provinces for Thailand.

Declined Cities/Provinces[^] - Thailand
Yala, Pattani, Narathiwat, Sonkhla

[^] Any cities of Thailand which are not mentioned in Table 3.2 can be covered.

The list of countries and cities is subject to change and/or update as and when necessary.

¹ The list of 'Major Cities' is aligned with section 4.1.7 "Pre-Approved Residency – Major Cities" and 4.1.8 – "Declined Residency" in Singlife New Business Handbook for FAR.

4. Mandatory Training

All existing PIAS Representatives including Supervisors (Tier 2s and Tier 3s) are required to complete the PIAS Cross-Border Training prescribed by the Company. This training will be assigned to all existing active representatives through the Singlife Group LMS.

Said training will consist of two parts: (a) Training and (b) Assessment. Both parts are mandatory to be fulfilled for the training to be deemed as completed. Training mode of (a) Training will be in e-Video learning. Once (a) Training is fully completed, (b) Assessment portion will follow and there will be a total of 15 questions with a passing mark of at least 80%. Representatives are allowed to retake the assessment should they not attain a mark of at least 80%. Upon full completion of training, a Certificate of Completion will be made available for the representative. This certificate is required for the representative to upload to the eFP application.

The PIAS Cross-Border Training will also be included in the mandatory on-boarding training program 'PIAS Induction Program Training' with the same training methodology and requirements as stated above.

Records of all successful completion will be updated to the 'PIAS Mandatory Training Tracker' excel file within T+2 business days of assessment date which is accessible via Docushare. Subsequently, maintenance of records for all successful completion of new representatives who joined PIAS after launch also on a T+2 business days timeline.

No sales advisory services on any Cross-Border related business should take place prior to the completion of full training and assessment completed and passed.

Disciplinary actions will be taken against PIAS Representatives who conducts Cross-Border business prior to fulfilling the mandatory training requirements. Disciplinary actions will also be taken against the relevant PIAS Supervisors who did not observe the required process for the signing off of the PIAS Financial Planner with Cross-Border business recommended.

5. Eligible Representatives

PIAS Representatives who have completed the mandatory cross-border training organized by the Training and Competency Department.

PIAS Supervisors who approve the cross border transactions submitted by their PIAS Representatives will have to complete the cross-border training organized by the Training and Competency Department.

PIAS may refuse or disqualify any PIAS Representatives from cross-border client engagement and business for reasons such as the Representative is found to have abused this arrangement or the monthly premiums have exceeded the limits set within this Guide etc.

6. Eligibility Terms and Conditions

The PIAS Representative is to ensure the following criteria is met:

- (i) The customer must not be a “Selected Client”².
- (ii) The sale or transaction comes through a **reverse enquiry** which refers to where the client initiates and identifies a potential need or enquiries about a product or product type;
- (iii) The customer initiating the reverse enquiry is an existing customer³ of PIAS;
- (iv) The PIAS Representative has met the customer at least once in person or through a video call and verified the identity of the customer(s);

The customer meets the wealth criteria⁴ as per below table -

S/N	Insurer	Accredited Investor (AI) only	Either OR		
			Annual Income	Net Personal Assets	Net Financial Assets
1	Singlife	No	S\$120,000 and above	S\$200,000 and above	S\$200,000 and above
2	China Life	Yes	S\$300,000 and above	S\$2,000,000 and above	S\$1,000,000 and above
3	ETIQA	No	Not Stated	Not Stated	Not Stated
4	Transamerica	Yes	S\$300,000 and above	S\$2,000,000 and above	S\$1,000,000 and above

- (v) Premium payment for the policy must be from a Singapore bank account or credit card issued by a Singapore bank under the customer’s name⁵. Similarly for funds flow to customer’s investment account, which must be from a Singapore bank account.

Cross Border Sales Thresholds – Singlife Group requirement

The value of monthly premiums from all customers located overseas is within 5% of PIAS total monthly premiums.

Cross Border Sales Thresholds – PIAS requirement

- All insurers: The value of monthly premiums from all customers located overseas is within 10% of PIAS total life insurance premiums for all insurers in preceding calendar year.
- Per insurer: The value of monthly premiums from customers located overseas is within 5% of PIAS total life insurance premiums for each insurer in preceding calendar year.

7. Additional Documents For Cross Border Customer Engagement and Business

For All In-Scope Product Providers

Documents required are:

- (i) Customer’s Singapore bank account or credit card statement (validity of 6 months) showing customer’s name, account number, address, and date legibly;
- (ii) Proof of savings/assets (for wealth criteria set by respective product providers).

² “Selected client” refers to an individual who meets any two of the following criteria (i) aged 62 years or older; (ii) not proficient in written or spoken English; or (iii) has below GCE O-Level or N-Level qualifications, or equivalent academic qualifications.

³ Existing customer refers to client with a profile in PIAS regardless of whether the client has any policies tagged to them.

⁴ For savings/assets held under joint-name account, customer’s share will be considered to be 50% of the total savings/assets.

⁵ For payment using Singapore bank account or credit card issued by a Singapore bank, customer needs to furnish a copy of bank statement or credit card statement respectively.

For Singlife Only For non-income earner application (e.g. spouse/child), the customer is to provide Q42 (Non-Income Earner Supplementary). The above wealth criteria will be applicable to the main income earner of the family. If the customer is not applying for the policy together with the non-income earner, the customer will need to provide a reason.

[Link to Q42 (Non-Income Earner Supplementary) -

https://singlife.com/content/dam/public/sg/documents/life/life-and-health-savings-retirement-forms/for-new-business-and-underwriting-forms-and-questionnaires/Q42_Non-Income_Earner_Supplementary_Questionnaire.pdf]

For China Life Only

Declaration Form for Non-Face-To-Face Sale

For Etiqa Only

Non-Face-To-Face Form (Reverse Enquiry Declaration)

For Transamerica Only

Non-Face-To-Face Acknowledgement Form For Offshore Client

8. Non Face-to-Face (“Non F2F”) Mode of Communication

Cross border customer engagement and business can be conducted via video conference or telephone call. To use the latter, the Representative must have met the customer at least once face-to-face or through video conference in accordance with PIAS Non F2F Sales Advisory Process Policy to verify the customer’s identity.

Important Notes

- ✓ PIAS Representatives should set aside sufficient time for Non F2F Sales Advisory Process similar to that of a face-to-face meeting.
- ✓ The Non F2F Sales Advisory Process should be conducted in a conducive environment to ensure that discussions are clear and audible.
- ✓ Where possible, the Non F2F Sales Advisory Process should be recorded with the consent of the Customer.

9. Non F2F Process for Cross Border Sales and Application

The Non F2F sales process largely mirror that set out in PIAS Non F2F Sales Advisory Process Policy. Adjustments are made to cater to specific requirements for purpose of mitigating risks arising from cross border sales and business.

9.1 PIAS Financial Planner

For purpose of the cross border Non F2F Sales Advisory Process, Singlife applications are submitted using **EzSub only**.

PIAS Representatives shall submit a digital copy of the PIAS Financial Planner by filling out the **Excel version or PDF editable version of the PIAS Financial Planner**, which can be found in DocuShare. PIAS Representatives can also use electronic financial planner submission (through PIAS eFP), see **Pt.0 -**

16. Use of PIAS eFP .

The PIAS Financial Planner sent to the Customer must be in a non-editable format by printing the file using “Microsoft Print to PDF” if the Excel version or PDF editable version of the PIAS Financial Planner is used.

The Financial Review in the PIAS Financial Planner may be performed for a single Customer or two Customers.

The signature fields on the last page of the Excel version or PDF editable version PIAS Financial Planner shall be completed with “SEE SUPP FORM” for both Customer and Representative signature fields and “SEE EMAIL” for the Supervisor signature field.

- ① Where the eFP is used, the last page of the PIAS Financial Planner shall be completed with “SEE SUPP FORM” for the Customer signature box and PIAS Representative shall submit the application electronically.

9.2 Use of Singlife EzSub

PIAS Representative **must** use Singlife EzSub to submit all Singlife life insurance applications for the Non F2F cross border business.

When using EzSub, PIAS Representatives can share a copy of the Proposal form(s), Cover Page, Policy Illustration, Product Summary and Bundled Product Disclosure Document (where applicable) with the Customer by using the “Preview” or “E-Sign” function.

When the Customer has given the confirmation that they want to proceed with the product recommendation(s), PIAS Representative should write “SEE SUPP FORM” in the Customer signature box and submit the application electronically. If “E-Sign” function is used, the Customer will digitally sign the application.

PIAS Representatives should ensure that all mandatory documents are uploaded to EzSub. Please refer to **Annex xx** for details.

⚠ In EzSub, to select: -

- (i) Residency Status = Social Visit Pass (Passerby)
- (ii) Submission via *Option 3 – NTF Advisory Process (Submit standalone Singlife NTF Supplementary Form Section D)*
- (iii) Additional documents:
 - (a) Customer’s Singapore bank account or credit card statement (validity of 6 months); and
 - (b) Proof of savings/assets (for wealth criteria of SGD 200,000)

9.3 Delivery of Pre-Sales Documents

PIAS Representatives shall send Customer via email, the PIAS and product provider's Non F2F Supplementary form (PDF fillable forms), and the necessary pre-sales documents (e.g. PIAS Financial Planner, Proposal form, Cover Page, Product Summary, Policy Illustration, etc).

⚠ The PIAS Representative must insert the following statement in the email to document and evidence the reverse enquiry :

"With reference to your enquiry and request for my financial advisory services and product(s) which we discussed, this email is to provide you a copy of the documents following our discussion, for your perusal."

PIAS Representatives must use his/or her PIAS corporate email (@proinvest.com.sg) for sending the pre-sales document to the Customer. The Representative's email to the Customer shall be sent to his/her valid registered email as stated on the PIAS Financial Planner and shall contain:

- i. The list of pre-sales documents for the review by Customer
- ii. Instructions to Customer on how to proceed with product recommendation(s) [Refer to **Pt 10** - Error! Reference source not found.]

PIAS Representatives must **forward** the documents from the application and attach all other completed pre-sales documents to the Customer's valid registered email as declared in the PIAS Financial Planner and Proposal form. The email should contain the weblinks of the publicly available documents such as Your Guide to Health/Life Insurance etc.

① Share confidential document by encrypting it with a password using the 7-zip application.

PIAS Representative shall encrypt all out-going emails containing any personal data (e.g. name, NRIC, address, etc.) **with their PIAS Rep Code** (e.g. PSXXXX, SGXXXX, or PFPXXXX, where XXXX refers to the numeric characters of your PIAS Rep Code). The password should be shared with the Customer separately via a different mode, such as text message.

10. Confirmation by Customers to Proceed with Product Recommendation(s)

Once the Customer confirms that they want to proceed with the product recommendation(s), the Customer shall sign and date the completed PIAS Non F2F Supplementary form as set out in Appendix 1 and Product Provider's Non F2F Supplementary Form *and* Proposal form for the application he/she is making, where applicable.

① Refer to Pt 13 -

① **11. Digital Signing of PIAS Non F2F and/or Product Provider's Supplementary/Proposal Form** of PIAS Non F2F Sales Advisory Process Policy for more details.

The Customer then replies with history to PIAS Representative's email, using his/her valid registered email as stated on the PIAS Financial Planner and Proposal form, and emails the following documents to the PIAS Representative:

- i. A completed and signed PIAS Non F2F Supplementary form;
- ii. A completed and signed Product Provider's Non F2F Supplementary Form *and/or* Proposal form;
- iii. Supporting documents such as Customer valid identification documents, proof of address document, source of funds/wealth document, where applicable;
- iv. Third Party Payor valid identification document, where applicable e.g. NRIC/Passport etc

The Customer does not need to sign or return the PIAS Financial Planner.

The PIAS Representative shall confirm receipt of the Customer's confirmation to proceed with the application and sign on the PIAS Non F2F Supplementary Form (Section D) under Representative's Declaration.

10.1 For Joint PIAS Financial Planner

If both Customers in the joint financial review want to proceed with the product recommendation(s), each Customer shall sign and date a completed PIAS Non F2F Supplementary form as set out in Appendix 1 and the product provider's Supplementary Form or Proposal form for the application he/she is making, where applicable.

Each Customer shall reply with history, using his/her valid registered email as stated on the PIAS Financial Planner and Proposal form.

- ① For joint financial review (i.e., completion of a joint PIAS Financial Planner), PIAS Representative shall send the necessary pre-sales documents to both Customers. Each Customer shall reply to the same email separately. E.g., The Customers may give their replies as two separate email thread or one after another in the same email thread.

11. Digital Signing of PIAS Non F2F and/or Product Provider's Supplementary/ Proposal Form

Same process as the Non F2F Sales Advisory Process.

- ① Refer to Pt 13 of the Non F2F Sales Advisory Process Policy



12. Approval By Supervisor

Same process as the Non F2F Sales Advisory Process.

- ① Refer to Pt 14 of the Non F2F Sales Advisory Process Policy



13. Premium Payment Method

No cash payment is allowed for premium payment.

Premium payment for the policy must be from a Singapore bank account or credit card issued by a Singapore bank under the Customer's name.

For internet banking, the Customer needs to provide a copy of the bank statement or other documentary proof that bank account belongs to him/her.

GIRO is allowed for subsequent premium payments. However, some banks may still require the original signed GIRO form to be submitted.

If the premium payment is made by a Third Party Payor, the following is required:

- (i) valid identification document e.g. NRIC/Passport etc of the Third Party Payor must be submitted as a supporting document.
- (ii) A copy of the payor's Singapore bank account or Singapore-issued credit card statement (within the last 6 months)

Further documents such as Enhanced Client Due Diligence ("ECDD") Form will be required, should Third Party Payor be from High Risk Countries / High Risk Occupation, or should there be any adverse news noted on Third Party Payor.

14. Submission to PIAS

Same process as the Non F2F Sales Advisory Process.

① Refer to Pt 16 of the Non F2F Sales Advisory Process Policy



15. Submission Cases Process

Same process as the Non F2F Sales Advisory Process.

① Refer to Pt 17 of the Non F2F Sales Advisory Process Policy



16. Use of PIAS eFP

16. Use of PIAS eFP

Same process as the Non F2F Sales Advisory Process.

① Refer to Pt 18 of the Non F2F Sales Advisory Process Policy



17. Customer Call Backs

Same process as the Non F2F Sales Advisory Process.


① Refer to Pt 19 of the Non F2F Sales Advisory Process Policy



18. Overview of Cross Border Sales Process

The steps below are depicted in a process flow chart in Appendix 2.

SN	Steps	Points to Note		
1	Conduct the presentation using video or telephone (for an existing Customer).	① For telephone call, the Representative must have at least once met the Customer in person or through video to verify identity.		
2	Send the documents (see first 5 items in Pt.5 below) to the Customer (securely) by email.	① Use of PIAS Corporate email ① Encrypt all out-going emails containing any personal data (e.g. name, NRIC, address, etc.)		
3	Receive the signed Documents back from the Customer (securely) by email. Forward the documents and email to the Supervisor.	① Although it is not required to submit the full email thread to Business Support/ upload onto e-submission platform such as EzSub, PIAS Representatives must ensure proper documentation and record keeping as they may be asked to produce the emails in the event of an audit or investigation.		
4	Documents to be sent to Business Support: 1. PIAS Financial Planner 2. Proposal Form(s) 3. Policy Illustration(s) 4. PIAS NF2F form (to cover all products recommended) 5. Product Provider’s NF2F form [For Singlife, this is the Singlife NF2F form (Section D)] 6. Last page of PIAS Financial Planner 7. Supervisor Approval Email 8. Singapore bank account or credit card statement (within last 6 months)	① For application via e-submission platform such as EzSub, the documents to upload in the e-submission platform are: <table><tr><td>PIAS Financial Planner – last page (see sample below)</td><td><ul style="list-style-type: none">• Save/print the last page.• Submit only the last page with “See Supp Form” or “See Email” on signature fields.• To complete the Name fields</td></tr></table>	PIAS Financial Planner – last page (see sample below)	<ul style="list-style-type: none">• Save/print the last page.• Submit only the last page with “See Supp Form” or “See Email” on signature fields.• To complete the Name fields
PIAS Financial Planner – last page (see sample below)	<ul style="list-style-type: none">• Save/print the last page.• Submit only the last page with “See Supp Form” or “See Email” on signature fields.• To complete the Name fields			

SN	Steps	Points to Note								
	<div>9. Supporting documents showing:-<ul style="list-style-type: none">For Singlife products: Annual Income ≥ SGD 120,000; or Net Personal Assets / Net Financial Assets ≥ SGD 200,000.For China Life / Transamerica products: Accredited Investor (“AI”) status i.e. Annual Income ≥ SGD 300,000; or Net Personal Assets ≥ SGD 2,000,000; or Net Financial Assets ≥ SGD 1,000,000</div> <div>10. Certificate of Completion</div> <div>11. Cross Border NTF Submission Checklist</div>	<table><tr><td>Supervisor Approval Email</td><td></td></tr><tr><td>PIAS NF2F Form</td><td><ul style="list-style-type: none">Digitally signed by Customer and PIAS Representative</td></tr><tr><td>Product Provider’s NF2F Form</td><td><ul style="list-style-type: none">Digitally signed by Customer, relevant parties and PIAS Representative</td></tr><tr><td>Supporting doc</td><td><ul style="list-style-type: none">Singapore bank account or credit card statement (within last 6 months)Proof of savings/assets</td></tr></table>	Supervisor Approval Email		PIAS NF2F Form	<ul style="list-style-type: none">Digitally signed by Customer and PIAS Representative	Product Provider’s NF2F Form	<ul style="list-style-type: none">Digitally signed by Customer, relevant parties and PIAS Representative	Supporting doc	<ul style="list-style-type: none">Singapore bank account or credit card statement (within last 6 months)Proof of savings/assets
Supervisor Approval Email										
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Supporting doc	<ul style="list-style-type: none">Singapore bank account or credit card statement (within last 6 months)Proof of savings/assets									
6	<div>All PIAS Non F2F cases require an independent callback engaged by the Company, and this will be done by TeleCentre. After 3 failed call attempts by TeleCentre, the Supervisor will be asked to contact the Customer to perform the Call back.</div> <div>If the contact by the Supervisor is unsuccessful, Supervisor shall give instructions via the Non F2F Client Call-Back Form to CFI the case.</div>	<div>① For call back to Customer by Supervisor, the Supervisor shall record the call back in the Non F2F Client Call-Back Form found in Appendix 3 of the “Non F2F Sales Advisory Process Policy” as evidence that the call backs have been performed with the Customer and submitted to Business Support.</div> <div> 1. PIAS NF2F Sales Advisory Policy V8.2.g</div>								