



Questions and Answers: CISRO Principles of Conduct for Insurance Intermediaries

1. How are the Principles aligned with the Canadian Council of Insurance Regulators (CCIR)-CISRO Fair Treatment of Customers (FTC) guidance?

The Principles supplement and build upon the intermediary elements in the FTC. The two documents are aligned, but the Principles are more targeted to intermediaries.

2. How can the Principles help customers?

The Principles summarize CISRO members' expectations of insurance intermediaries in a plain language format. Intermediaries are encouraged to share and explain the Principles with customers to help them understand what to expect from an intermediary. Applying the Principles can help intermediaries protect, inform and build trust with their customers.

3. How will the Principles be adopted / implemented by the individual CISRO members?

The Principles have been agreed upon by the CISRO members. Consistent with the CCIR-CISRO FTC guidance, individual regulators will potentially publicly endorse / release communications about the implementation of the Principles in their jurisdictions.

Intermediaries should conduct their business following the Principles that are relevant to them, while complying with all applicable laws, regulations, rules, or regulatory codes within all jurisdictions where they carry on business. Any more stringent requirements, rules or standards of conduct from the regulators take priority over the Principles.

4. How does CISRO expect industry to implement the Principles?

Consistent with the CCIR-CISRO FTC guidance, the Principles were created to communicate to industry expected outcomes in ensuring the fair treatment of customers in a principles-based manner.

Intermediaries should conduct their business following the Principles that are relevant to them, while complying with all applicable laws, regulations, rules, or regulatory codes within all jurisdictions where they carry on business. Any more stringent requirements, rules or standards of conduct from the regulators take priority over the Principles.

Intermediaries are encouraged to share and explain the Principles with their customers as a leading practice.

CISRO members envision that insurers and intermediaries with contractual or regulatory oversight obligations for intermediaries will:

- Ensure intermediaries are aware of the Principles that are relevant to them and that these Principles are reflected in education / training materials; and
- Align policies and procedures, codes of conduct and other relevant business documents with the Principles.

As the Principles are aligned with the CCIR-CISRO FTC Guidance, which has been and continues to be implemented by industry, the adoption of the CISRO Principles should not create more burden.

5. Are the Principles applicable to direct relationship insurers and captive agents?

Yes, all insurance agents should conduct their business following the Principles that are relevant to them. This includes any captive agents, including those that work for direct relationship insurers.

6. Are the Principles applicable to restricted agents and those exempted from licensing or registration?

Yes, all intermediaries authorized to conduct insurance business within any jurisdiction should follow the Principles that are relevant to them. This includes restricted agents, and those exempted from licensing or registration, who are involved with selling insurance associated with another product (e.g., banks, credit unions, travel agencies, car dealerships, etc.).

7. Are the Principles applicable to National Accounts?

The Principles apply to business entities that distribute insurance products and services. If a National Account engages in these types of activities, then yes, the Principles apply and it should conduct its business following the Principles that are relevant to it.

8. Are the Principles applicable to all adjusters?

Yes, all types of adjusters should conduct their business following the Principles that are relevant to them. This includes “in-house” employees of licensed insurers who are acting in an adjuster role and adjusting claims, independent adjusters who may work for a third-party company, and public adjusters.

9. How is Principle 7 — Claims, Complaints Handling and Dispute Resolution — applicable to intermediaries whose primary responsibilities do not include the handling of claims, complaints and disputes?

Intermediaries that do not have a primary role in these processes should pass on claims or complaints to the right area to handle or resolve in a timely manner, and to provide information to support the processes as needed.