AIA

# Agency Control and Governance Newsletter 2026



Issue No. 2 Q2 2026




## Updates on Guidelines and Other Important Compliance Updates




## 01 Agency Management and the Use of Social Media

The Insurance Authority ("IA") published the latest issue of "Conduct in Focus" in March 2026. The publication focuses on conduct and compliance matters relating to insurance intermediaries, with particular emphasis on financial planners' daily sales activities and team management. Below is a summary of the key points and compliance reminders:

**(i) Agency Structure and Downline Management**
The IA pointed out that as agents progress within the agency hierarchy, their roles often extend beyond frontline sales activities. Not only are they required to coach and supervise their downline agents, agency leaders also play a critical role in cultivating compliance culture within the team to ensure their downline agents comply with conduct and regulatory requirements. The publication sets out the IA's regulatory considerations for agency team management, including the standards of oversight and accountability expected of agency leaders to promote appropriate conduct by their downline agents.

**(ii) Use of Social Media in Insurance Promotion**
In view of the increasing use of social media to promote insurance business, the IA reiterates the core conduct principles and compliance expectations applicable to the use of social media. This publication highlights common risk areas and practical considerations to help ensuring that promotional content is clear, fair and not misleading.

**(iii) Key Observations from IA Enforcement Actions**
The publication also shares the IA's observations arising from its enforcement actions against multiple licensed broker companies, including recent disciplinary actions due to deficiencies in Anti-Money Laundering and Counter-Financing of Terrorism ("AML/CFT") controls.

All financial planners (FPs) are encouraged to study the contents of this communication to ensure that their daily sales activities, team management, and promotional practices comply with the latest regulatory requirements and standards of the Insurance Authority. For details, please refer to the link: CIF (EN) - March 2026 (Final)

You may refer to Memo A260457 or "Conduct in Focus" for more details.

# 02 Roadshow Materials Supports

According to the Insurance Authority's Code of Conduct, General Principles 1 and 5:

- When promoting, marketing, or advertising insurance products, **only materials provided and approved by AIA should be used** to ensure that such materials help customers make decisions, are in their best interests, and do not contain any misleading information.
- Any self-produced sales materials must be submitted to the Company for **review** and **approval before** use.

## Examples of approved roadshow materials









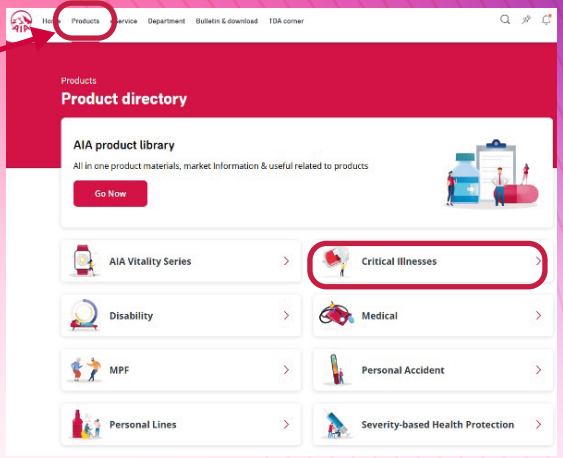






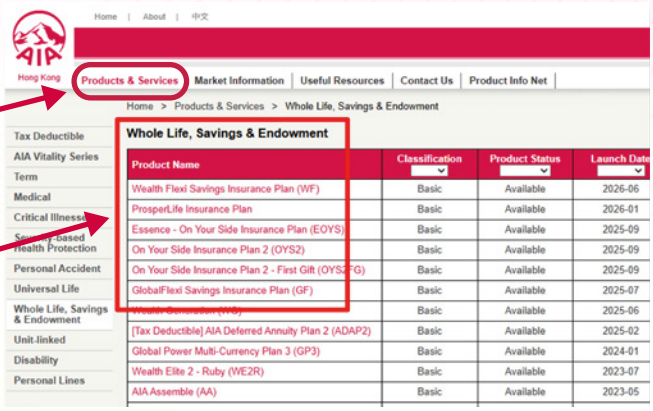
Sales Enablement - Official customer-facing materials that you can use to promote AIA insurance products
Path: eAC > Product Directory > Product & Services > Relevant Product Categories > Relevant Product > Sales Enablement

**Product Directory**

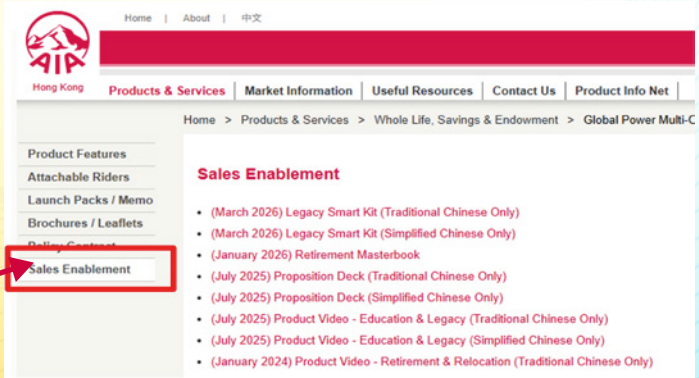



**Product & Services**

**Relevant Product Categories**




**Sales Enablement**



## Case Sharing

Throwing back to the previous quarter (2026 Q1), a total of 178 FPs were substantiated for misconduct. The largest proportion, 115 of them, breached Company's internal guidelines, followed by 28 FPs who were involved in improper client servicing. **Compared to the fourth quarter of 2025, these figures have increased,** with fraud cases also showing an upward trend.

We would like to reiterate that the Company adopts a "zero-tolerance" policy toward all fraudulent activities. Any substantiated fraud case will result in the termination of the financial planner's contract, and the case will be referred to law enforcement and/or relevant regulatory authorities for further action.

| Types of Substantiated Misconduct | No. of Intermediaries |
|---|---|
| Intermediary Fraud | 21 |
| Mis-selling | 4 |
| Agency management / Internal guidelines | 115 |
| Client servicing | 28 |
| Others | 10 |
| **Total** | **178** |

ACG reminder: Under the MCC's Point-Deduction System, if **four points have been deducted in rolling one year** or **six points in rolling two years' period**, the respective FP's **contract will be terminated**.



# Case sharing 01 Recommending Other Companies' Products

You mentioned that the client wants to understand products from several insurance companies. What do you intend to do?

I found several plans online and will recommend them together to offer the client more options, so he can see that I am acting in his best interests.

That is not compliant! Under Section 64G(1) and (3)(b) of Cap. 41 Insurance Ordinance, as a licensed insurance agent, you must **act on behalf of the appointing insurer** when carrying out regulated activities.

So I can only represent my appointing company?

Correct! You may only recommend insurance products offered by the appointed insurer (i.e. AIA) to customers.

Understood! I should not advise customer to consider other companies' products.

In accordance with General Principles 5 (Disclosure of Information) & 6 (Suitability of Advice) of the Code of Conduct for Licensed Insurance Agents, you should first understand the customer's needs and then recommend suitable products within your company's offerings, and any product comparison should be made accurately and not misleading.



Understood.

ACG reminds all FPs that licensed insurance agents may **only carry out regulated activities in their capacity as agents of the insurer that has appointed them** and may only provide advice on insurance products offered by their appointed insurer, in accordance with Section 64G of the Insurance Ordinance (Cap. 41).

- 🚫 Do not recommend or promote products from insurers with whom you have no appointment relationship, or provide any inaccurate or misleading product comparisons
- ✅ Provide suitable product recommendations from your company based on the customer's needs

# Case sharing 02 Sending Policy with Unmasked PII

A client asked about the policy status, so I sent a PES (Policy Enquiry System) screenshot via WhatsApp.

Did you mask the client's personal data (PII) before sending?

Oh, I didn't!

Before sending any documents, ensure client privacy is protected by **masking all sensitive personal information.** Additionally, **PES screenshots should not be sent directly to customers**.

What should I do instead?

You should download the masked policy version from PES and send that.

Understood, use the official masked version, not screenshots.

Exactly!




ACG reminds FPs to take note the following:

- ✅ Always mask clients' personal data (PII) (e.g. HKID number, address) before sending policies or related documents
- ✅ Must handle client data with care and take reasonable steps, e.g. insert of encryption and password, to safeguard client data and ensure documents with personal data are properly stored.
- ✅ Use the official masked policy version downloaded from PES
- 🚫 Do NOT：
  - Send policy or information without masking
  - Use PES screenshots for sharing

# Case sharing 03 Obtaining Customer Contact via Third Parties Without Consent

The customer's contact details appear to have changed, and I have been unable to reach them. I am thinking obtaining the customer's phone number from their friend. Is that okay?

**Do not** collect personal data **without** the client's consent.

What should I do instead?

Recommended approach:

a) Contact the client directly **using the registered contact details with our Company (e.g., email); or**

b) b) Ask the third party to **relay the message and have the client contacting you directly.**

Got it!




ACG reminds FPs:

- Only obtain client contact details through **proper and approved channels**
- You may request a third party to relay your message and have **the customer contacting** the FP **directly**.

Do NOT:

- Collect client contact details from third parties without consent
- Use informal or unverified sources to obtain personal data

# Case sharing 04 Delay in Claims Settlement Due to Referral to a Third Party

Recently, I handled a claims case that was not particularly complicated. However, the client did not receive the payout for some time, which ultimately led to a complaint.

Was the issue related to the claim amount?

That was not actually the case. The claim had already been approved. Since the client was more familiar with another FP, I delegated the follow-up work to that colleague, with the intention of helping the client receive the payout more quickly. However, the colleague was very busy and could not follow up in a timely manner. As a result, the client assumed there was a delay in the claims process and contacted the Company's customer service department. After learning from customer service centre that the claim had already been approved, the client subsequently filed a complaint.

Assigning a case to another FP or third party may seem convenient, but it can actually introduce unnecessary delays and errors.

Exactly. Once trust is damaged, it is often much harder to rebuild than to establish in the first place.




ACG reminds FPs:

- ✅ Communicate directly with the policyholder and follow up on the case personally.
- ✅ Personally explain requirements and verify information regarding policies and claims to ensure accuracy.
- ✅ Maintain proper record of cheques issued by the Claims.
- 🚫 Do NOT:
  - Delegate claims handling or act as a primary communication bridge through other FP or third parties.
  - Over-rely on a third party to relay important requirements or document details.
  - Avoid direct contact with the policyholder for convenience

# Case sharing 05 Distribution of Self-made MPF Materials

One of my clients recorded a strong MPF return last year, so I prepared a brief introduction on some MPF fund performance and shared the portfolio information on social media. I invited anyone interested to contact me, and I could also forward the relevant materials for their reference if needed.

It sounds appealing, but according to MPFA guidelines (VI.2, III.5A), subsidiary intermediaries may only distribute promotional materials that have been approved by their principal intermediary. In addition, publishing self-made materials without approval may also breach Section 5.2.1 of the "Market Conduct Guidelines" which covers illustrative documents and sales materials.

I'll remove the materials immediately.



ACG reminds FPs:

- ✅ MPF subsidiary intermediaries may only distribute promotional materials that have been approved by their principal intermediary.
- ✅ If self-developed sales materials are used, prior review and approval must be obtained from the Company to ensure all information provided is accurate, consistent, and compliant with Company guidelines.

🚫 Do NOT:

- Publish unapproved self-developed sales materials or product information.
- Use self-designed charts, examples, or data for product promotion.
- Self-developed content as a substitute for official company materials.