

19 September 2025

Ref: INS/TEC/6/96  
HKMA/B1/15C

To: Chief Executives of all authorized insurers carrying on long term business; Chief Executives of all authorized insurers carrying on general business; Chief Executives of all authorized institutions; and Responsible Officers of all licensed insurance broker companies and licensed insurance agencies carrying on regulated activities

Dear Sirs/Madams,

**Circular on the Naming Requirements for Insurance Products**

The Insurance Authority (“IA”) and the Hong Kong Monetary Authority (“HKMA”) have observed that certain insurance products currently marketed in Hong Kong may create confusion among prospective policy holders regarding their nature. In particular, insurance products with savings features may be misunderstood as bank deposits due to the lack of clear indications that these products are insurance policies. This could result in complaints from policy holders.

To address this issue and ensure that insurance products with savings features are presented clearly and accurately, the IA and the HKMA consider it necessary to set out supervisory expectations regarding the naming of these products. Insurance products that meet one or more of the following criteria (referred to as “in-scope products”) are required to include the word “insurance” in their English product names and the word “保險” in their Chinese product names -

- (i) being designed to meet customers’ savings needs<sup>1</sup>; or
- (ii) being marketed or promoted as having a “savings” feature in product brochures or any marketing materials, regardless of whether the term “savings” or similar descriptions are used.

The requirement aims to ensure that the nature of the product is clearly and unambiguously communicated to the prospective policy holders at the point of sale and throughout the entire policy lifecycle. For clarity, this requirement applies solely to the basic plan and not to riders. Furthermore, Investment-Linked Assurance Scheme (“ILAS”) products and Qualifying Deferred Annuity Policy (“QDAP”), which are widely recognized as insurance products, are exempt from this requirement.

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<sup>1</sup> This includes, but is not limited to, insurance policies that meet the “savings” objective as specified under the Guideline on Financial Needs Analysis (GL30).

In recognition of the operational and system changes necessary for implementation, the supervisory requirement outlined in this circular will be introduced in two phases -

- (i) **Phase 1** shall take effect from 1 January 2026 (“**Effective Date**”), for all new in-scope products launched on or after this date; and
- (ii) **Phase 2** shall take effect from 1 January 2027, for all existing in-scope products (i.e. products that are available before the Effective Date) that will continue to be sold on or after 1 January 2027. Insurers are expected to take appropriate measures to ensure that all relevant policy documents, including but not limited to marketing materials and subsequent communications with policy holders, are revised accordingly<sup>2</sup>. For clarity, existing insurance products that will cease to be sold before 1 January 2027 will not be required to comply with this requirement.

The IA and the HKMA expect all insurers and insurance intermediaries to ensure that their staff, particularly those involved in product development, marketing, distribution and compliance, are fully informed about this requirement. Furthermore, insurers and insurance intermediaries should take measures to ensure that their internal controls and governance frameworks are sufficiently robust to support compliance with this circular, in order to uphold the principles of treating customers fairly and acting in their best interests.

Should you have any questions in relation to the above, please contact your case officers at the IA. For banking conduct matters, please contact Mr Banny Yu at 2878-8272 or Mr Ken Chan at 2878-1373 of the HKMA.

Yours faithfully,

Marty Lui  
Executive Director  
Long Term Business Division  
Insurance Authority

MM Lee  
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Hong Kong Monetary Authority

c.c. The Hong Kong Federation of Insurers  
The Hong Kong Confederation of Insurance Brokers  
Professional Insurance Brokers Association  
The Hong Kong Association of Banks  
The DTC Association

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<sup>2</sup> Insurers should notify relevant existing policy holders of the product name change using the preferred communication methods specified by the policy holders (e.g. SMS, email) or provide notification along with annual statements or renewal premium notices.