

Notice No: MAS 508

Issue Date: 30 December 2025

**NOTICE TO INSURANCE BROKERS AND ACCIDENT AND HEALTH
INSURANCE INTERMEDIARIES
INSURANCE ACT 1966**

**REPORTING OF MISCONDUCT OF BROKING STAFF BY
INSURANCE BROKERS AND OF REPRESENTATIVES BY ACCIDENT
AND HEALTH INSURANCE INTERMEDIARIES**

Introduction

1 This Notice (excluding the Annexes) is issued pursuant to section 154(4) of the Insurance Act 1966 ("the Act") and takes effect from 1 January 2027. MAS 504 issued on 26 November 2010 is cancelled with effect from 1 January 2027.

2 This Notice shall apply to —

- (a) all insurance brokers who are registered under section 76 of the Act or exempt from registration under section 92(1)(a), (b), (c), (d), (e) or (f) of the Act, in relation to the reporting requirements for the misconduct of their broking staff and former broking staff; and
- (b) all accident and health insurance intermediaries, in relation to the reporting requirements for the misconduct of their representatives and former representatives.

Definitions and Forms

3 For the purposes of this Notice —

“accident and health insurance intermediary” means a licensed direct insurer, licensed financial adviser, exempt financial adviser, which carries on a business in an accident and health insurance intermediary activity;

“accident and health insurance intermediary activity” —

- (a) in the case of a licensed direct insurer or its representative, means arranging contracts of insurance in respect of any long-term accident and health policy where the risks of such policy are underwritten by the direct insurer;
- (b) in the case of a licensed financial adviser, exempt financial adviser, or a representative thereof, means as an agent for one or more insurers, arranging contracts of insurance in Singapore in respect of any long-term accident and health policy;

“broking staff”, in relation to an IB, means a person who acts for, or by arrangement with, the IB in the performance of all or any of the insurance broking activities carried out by the IB;

“client” means an insured or intending insured;

“corrective action” means any disciplinary action taken by an IB or accident and health insurance intermediary against its broking staff or former broking staff or its representative or former representative (as the case may be), or any remedial measure taken by an IB or accident and health insurance intermediary, in respect of a misconduct;

“IB” means a registered insurance broker or a person who is carrying on business as an insurance broker and exempted from registration under section 92(1)(a), (b), (c), (d), (e) or (f) of the Act;

“insurance broking activity” means —

- (a) receiving proposals for, or issuing, policies in Singapore;
- (b) collecting or receiving premiums on policies in Singapore; or
- (c) arranging contracts of insurance in Singapore,

as an agent for insureds or intending insureds in respect of —

- (i) policies relating to general business and long-term accident and health policies, other than insurance policies relating to reinsurance business; or
- (ii) reinsurance of liabilities under policies relating to life or general business;

“Investigation Report” means a report by that name which is submitted in accordance with paragraph 4;

“licensed direct insurer” means an insurer which is for the time being licensed under section 11 of the Act as a direct insurer;

“misconduct” means—

(a) any act or omission in the performance of any insurance broking activity or accident and health insurance intermediary activity which amounts to gross negligence or which results in any inappropriate advice, inappropriate recommendation, misrepresentation, or inadequate disclosure of information to a client, including:

(i) the failure to exercise due care and diligence in understanding and satisfying the insurance requirements of the client or take all reasonable steps to act fairly in the interests of the client;

(ii) the making of a deceptive, false or misleading statement to a client; or

(iii) the failure to make adequate disclosure of all facts and information for the client to make an informed decision,

where the act or omission has a materially adverse impact on the interests of the client or impinges on the fitness and propriety of the broking staff or representative; or

(b) any act involving fraud, dishonesty, illegal monetary gains, or any offence of a similar nature, such as cheating, forgery, dishonest misappropriation of monies, criminal breach of trust, bribery, money laundering and tax evasion;

“Misconduct Report” means a report by that name which is submitted in accordance with paragraph 4;

“public authority” means any body established by or under any written law and exercising powers vested therein by written law for a public purpose;

“representative”, in relation to an accident and health insurance intermediary, means a person who acts for, or by arrangement with, an accident and health insurance intermediary in the performance of all or any of the accident and health insurance intermediary activities carried out by the accident and health insurance intermediary;

“Update Report” means a report on any update to a Misconduct Report or an Investigation Report which is submitted in accordance with paragraph 4.

4 Unless the Authority otherwise permits, any Investigation Report, Misconduct Report or Update Report required to be submitted to the Authority under this Notice must be submitted through the electronic system established by the Authority in the relevant form set out in the electronic system, and the form shall be completed in accordance with such directions as may be specified in the form and electronic system.

Submission of Misconduct Report and Investigation Report

Submission of the Misconduct Report

5 If an IB has reasonable grounds to believe that—

- (a) its broking staff had committed any misconduct; or
- (b) its former broking staff had committed any misconduct during the period when he or she was a broking staff of the IB,

the IB must submit a Misconduct Report to the Authority, providing all the applicable information required therein in relation to the misconduct (called in this Notice “alleged misconduct”), no later than 21 calendar days, or such longer period as the Authority may allow in writing, after the date on which the IB first has reasonable grounds to believe that which is mentioned in sub-paragraph (a) or (b).

Submission of the Investigation Report

6 If the alleged misconduct falls within paragraph (b) of the definition of “misconduct”, an IB mentioned in paragraph 5 must —

- (a) assess whether it should lodge a police report in respect of the alleged misconduct; and
- (b) at the same time as its submission of the Misconduct Report, submit an Investigation Report to the Authority, providing all the applicable information required therein including the following:
 - (i) in the case where it has not lodged a police report by the time it submits the Misconduct Report —
 - (A) confirmation of whether it has assessed and decided not to lodge a police report or is still in the process of assessing this; and
 - (B) if it has assessed and decided not to lodge a police report, the reasons for its decision not to lodge a police report;
 - (ii) in the case where it has lodged a police report by the time it submits the Misconduct Report — the information mentioned in paragraph 8.

7 If the alleged misconduct falls outside paragraph (b) of the definition of “misconduct”, an IB mentioned in paragraph 5 must submit an Investigation Report to the Authority —

- (a) in the case where —
 - (i) the IB’s reasonable grounds mentioned in paragraph 5 are, in any way, based on or corroborated by the findings of any internal investigation¹ into the alleged misconduct at the time it submits the Misconduct Report; or
 - (ii) the IB has lodged a police report in respect of the alleged misconduct by the time it submits the Misconduct Report —

¹ An IB may refer to the Guidelines on the Conduct of Internal Investigations in Annex A on the expectations relating to the conduct of internal investigations into any misconduct.

at the same time as its submission of the Misconduct Report; and

- (b) in any other case, where the IB subsequently makes findings in its internal investigation which corroborates the alleged misconduct or lodges a police report in respect of the alleged misconduct — no later than 21 calendar days, or such longer period as the Authority may allow in writing, after the date on which findings are made or the police report is lodged (as the case may be).

8 Where there is a police report lodged by the IB, the Investigation Report submitted under paragraph 6 or 7 must provide all the following information, where available, together with a copy of the police report:

- (a) the name of the police officer investigating the case; and
- (b) the status of the police investigation and criminal proceedings (if any), including any outcome or result.

Updates to Misconduct Report or Investigation Report

9 Once a Misconduct Report or Investigation Report is submitted in relation to an alleged misconduct, if there is any significant development which necessitates an update to any reported or reportable information in the submitted Misconduct Report or Investigation Report or both (including a Misconduct Report or Investigation Report as updated by a previously submitted Update Report), the IB must submit to the Authority an Update Report or Update Reports, as the case may be², no later than 21 calendar days, or such longer period as the Authority may allow in writing, after the date of occurrence of that significant development.

10 In paragraph 9, “significant development” includes, but is not limited to, the following:

² To avoid doubt, separate Update Reports are to be provided on a Misconduct Report and on an Investigation Report as long as information arising from the significant development is reportable as part of the data fields in the applicable form for the Misconduct Report and the Investigation Report respectively. Where the information arising from the significant development is reportable as part of the data fields in the Investigation Report but not in the Misconduct Report, an Update Report is only required to update the Investigation Report and not the Misconduct Report, and vice versa.

- (a) the lodging of a police report by the IB in respect of the alleged misconduct;
- (b) a decision by the IB not to lodge a police report, if the IB had pursuant to paragraph 6(b)(i)(A) confirmed that it was still in the process of assessing whether it should lodge a police report;
- (c) an arrival at an outcome, or a change in the outcome, of the IB's internal investigation into the alleged misconduct, regardless of whether this substantiates or does not substantiate the alleged misconduct;
- (d) a decision by the IB to take, or to reverse, modify or add to, any corrective action in respect of the alleged misconduct³;
- (e) the IB being notified or made aware, through any source, of the outcome of police investigations or criminal proceedings (if any) in respect of the alleged misconduct.

11 For a significant development mentioned in paragraph 10(a), the Update Report to the IB's submitted Investigation Report must provide all the following information, where available, together with a copy of the police report:

- (a) the name of the police officer investigating the case; and
- (b) the status of the police investigation and criminal proceedings (if any), including any outcome or result.

12 For a significant development mentioned in paragraph 10(b), the Update Report to the IB's submitted Investigation Report must provide the reasons for its decision not to lodge a police report.

Provision of Misconduct Report and Update Report to Broking Staff

13 Subject to paragraph 15, the IB must provide to the broking staff or former broking staff concerned —

³ An IB may refer to the Guidelines on Corrective Action in Annex B on the expectations relating to the taking of corrective action in respect of any misconduct.

- (a) a copy of the Misconduct Report, no later than 21 calendar days, or such longer period as the Authority may allow in writing, after the date of submission of the Misconduct Report to the Authority; and
- (b) where applicable, a copy of each Update Report to its submitted Misconduct Report, no later than 21 calendar days, or such longer period as the Authority may allow in writing, after the date of submission of the respective Update Report to the Authority.

14 To avoid doubt, an IB is not required to provide to the broking staff or former broking staff, a copy of any Investigation Report or Update Report to its submitted Investigation Report, or a copy of any police report submitted to the Authority together with its Investigation Report or Update Report.

15 Paragraph 13 shall not apply if —

- (a) the IB is acting, or is proposing to act, in connection with its internal investigation which is being, or is about to be, conducted, and the provision of the copy of the Misconduct Report or Update Report (as the case may be) to the broking staff or former broking staff concerned is likely to prejudice that investigation or proposed investigation;
- (b) the IB knows or has reasonable grounds to suspect that any officer of a public authority is acting or is proposing to act, in connection with an investigation which is being, or is about to be, conducted, and either —
 - (i) any officer of the public authority has requested for the IB not to disclose to the broking staff or former broking staff information in respect of the alleged misconduct which is contained in the Misconduct Report or Update Report; or
 - (ii) the provision of the copy of the Misconduct Report or Update Report (as the case may be) to the broking staff or former broking staff concerned is likely to prejudice that investigation or proposed investigation; or

- (c) the individual concerned is a former broking staff and the IB has taken reasonable steps but is unable to contact the former broking staff using his or her last known contact details.

16 An IB who relies on paragraph 15(a) or (b) must provide a copy of the Misconduct Report or Update Report (as the case may be) to the broking staff or former broking staff as soon as practicable after the circumstances mentioned in that paragraph no longer apply⁴.

Keeping of Relevant Records

17 An IB must keep proper records of —

- (a) documentary evidence that a copy of the Misconduct Report or Update Report has been provided to the broking staff or former broking staff concerned;
- (b) its assessment on the likelihood of prejudice to any investigation, if the IB does not provide a copy of the Misconduct Report or Update Report to the broking staff or former broking staff concerned in reliance on paragraph 15(a) or (b)(ii);
- (c) the request from the officer of the public authority, if the IB does not provide a copy of the Misconduct Report or Update Report to the broking staff or former broking staff concerned in reliance on paragraph 15(b)(i); or
- (d) the reasonable steps taken by the IB to contact the former broking staff, if the IB does not provide a copy of the Misconduct Report or Update Report to the former broking staff concerned in reliance on paragraph 15(c).

18 Where an IB conducts an internal investigation into an alleged misconduct, the IB must keep proper records of the following, where applicable:

⁴ That is, when the provision of such copy is no longer likely to prejudice any investigation or proposed investigation, or the officer of the public authority no longer requests for the IB not to disclose information contained in such Misconduct Report or Update Report.

- (a) a summary of the facts of the case, such as the source of the allegation or suspicion, the number of clients affected, details of relevant transactions and the financial impact on the clients;
- (b) accounts from relevant parties such as the broking staff or former broking staff, and the client;
- (c) documentary evidence of the alleged misconduct;
- (d) the investigator's assessment and recommendation;
- (e) corrective action taken, and basis for the corrective action;
- (f) appeal against the corrective action, along with assessment and the outcome of the appeal.

19 An IB must keep the records mentioned in paragraphs 17 and 18 for a period of not less than 5 years.

Application of this Notice to Accident and Health Insurance Intermediaries and their Representatives

20 Paragraphs 5 to 19 of this Notice apply to an accident and health insurance intermediary in relation to its representative or former representative, as they apply to an IB in relation to its broking staff or former broking staff.

Transitional Provisions

21 Despite paragraph 5, where an IB –

- (a) first had reasonable grounds to believe, before 1 January 2027, that any type of misconduct within the definition of “misconduct” in paragraph 3 of this Notice was committed by its broking staff or its former broking staff when he or she was its broking staff;
- (b) has not submitted to the Authority a Misconduct Report, which is in the form set out at Appendix 1 of the Notice on Reporting of Misconduct of Broking Staff by Insurance Brokers (MAS Notice

504) (“**Cancelled Notice**”), in relation to the misconduct before 1 January 2027,

the IB must submit to the Authority a Misconduct Report in relation to the misconduct under this Notice and any other document or information that may be required under paragraphs 6 to 8 of this Notice, no later than 21 calendar days, or such longer period as the Authority may allow in writing, after 1 January 2027.

22 For the purpose of paragraph 21, “broking staff” has the meaning given by paragraph 3 of the Cancelled Notice.

23 This Notice does not apply to or in relation to any of the following, and despite paragraph 1, the Cancelled Notice as in force immediately before 1 January 2027 continues to apply to or in relation to any of the following as if this Notice has not been issued:

- (a) any case for which an IB submitted a Misconduct Report under the Cancelled Notice (which is in the form set out at Appendix 1 of that Notice) before 1 January 2027;
- (b) any case for which an IB was required under the Cancelled Notice to submit a Misconduct Report (which is in the form set out at Appendix 1 of that Notice) by 31 December 2026,

save that a reference in the Cancelled Notice to “MASNET” is to MASNET or any electronic system which may be established by the Authority in place of MASNET.

Note:

Under section 142(3) of the Act, any person who is guilty of any breach of a duty imposed by this Act or any direction issued by the Authority (which would include this Notice) under section 154(4) shall be guilty of an offence and, where no penalty is expressly provided, shall be liable on conviction, other than in the case of an individual, to a fine not exceeding \$100,000 and, in the case of a continuing offence, to a further fine not exceeding \$10,000 for every day or part of a day during which the offence continues after conviction.

Guidelines on the Conduct of Internal Investigations

1 An IB is expected to conduct internal investigations once it suspects that a misconduct was or has been committed by a broking staff or former broking staff. The investigation process should take into account any appeals submitted by the broking staff or former broking staff in relation to the alleged misconduct and also incorporate relevant sources of information including the following, where applicable:

- (a) interviews with relevant parties, such as clients, broking staff or former broking staff;
- (b) transactions, sales documents, post-sale surveys, call-backs to clients, and correspondence between the broking staff and the client.

2 Paragraph 1 applies to an accident and health insurance intermediary in relation to its representative or former representative, as it applies to an IB in relation to its broking staff or former broking staff.

3 The guidelines in this Annex are issued pursuant to the Insurance Act 1966 (the “Act”) and provide guidance to IBs and accident and health insurance intermediaries on the conduct of internal investigations into misconduct mentioned in MAS Notice 508 (“the Notice”). The expressions used in these guidelines have the same meanings as in the Notice. These guidelines should be read in conjunction with the provisions of the Act, the subsidiary legislation made thereunder, and other relevant legislation, notices, codes, guidelines and Frequently Asked Questions issued by the Authority. Any failure to comply with the guidelines set out in this Annex does not of itself render an IB or accident and health insurance intermediary liable to criminal proceedings.

Guidelines on Corrective Action

1 An IB is responsible for the conduct of its broking staff. It should take appropriate corrective action including such action against its broking staff or former broking staff for any misconduct committed by them in relation to the carrying on of insurance broking business and ensure consistency in its application of corrective action.

2 The type of corrective action that an IB may take against its broking staff or former broking staff in respect of any misconduct committed depends on the severity of the case and includes, but is not limited to, any one or more of the following:

- (a) suspension from carrying on any insurance broking business;
- (b) restitution of misappropriated monies;
- (c) fine;
- (d) warning;
- (e) demotion;
- (f) termination of the broking staff's employment or arrangement with the IB;
- (g) clawback;
- (h) re-training;
- (i) enhanced supervision and monitoring.

3 An IB should have an internal process for addressing the appeals against any corrective action.

4 An IB should have an internal process to identify the root cause of the misconduct and implement appropriate remedial measures that include, but are

not limited to, improvement of controls, systems and processes to address the weaknesses identified which led to the misconduct.

5 Paragraphs 1 to 4 apply to an accident and health insurance intermediary in relation to its representative or former representative, as they apply to an IB in relation to its broking staff or former broking staff.

6 The guidelines in this Annex are issued pursuant to the Insurance Act 1966 (the “Act”) and provide guidance to IBs and accident and health insurance intermediaries on the taking of corrective action for misconduct mentioned in MAS Notice 508 (“the Notice”). The expressions used in these guidelines have the same meanings as in the Notice. These guidelines should be read in conjunction with the provisions of the Act, the subsidiary legislation made thereunder, and other relevant legislation, notices, codes, guidelines and Frequently Asked Questions issued by the Authority. Any failure to comply with the guidelines set out in this Annex does not of itself render an IB or accident and health insurance intermediary liable to criminal proceedings.