



# Procedure on Door-to-Door Sales

## Procedure

Owner: Head of Compliance, Korea

November 2025, Version 3.0

<b>Purpose</b>	The purpose of this Procedure is to set forth standards and procedures that must be followed in sales activities including but not limited to investment solicitation and entering into contracts relating to investment products when sales activities are performed through door-to-door sales and etc.
<b>Scope</b>	Natixis Asia Limited, Seoul Branch
<b>Version</b>	3.0
<b>Policy Owner</b>	Head of Compliance, Korea
<b>Policy Manager</b>	
<b>Approver(s)</b>	Seoul Management Committee
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<b>Related Documents</b>	Global Policy – Suitability and Complaints

## Revision History

Version	Date	Description of Revision	Author / Preparer	Reviewer	Approver
1.0	12/15/2023	Establishment according to revision of the Act on Protection of Financial Consumer	Myung Jin Koo, Head of Compliance, Korea	Heads of Global Markets, Coverage & Real Assets, Korea	Seoul Management Committee
2.0	12/20/2024	No changes. Annual review.	Hyesoo Lee, Compliance, Korea	Heads of Global Markets, Coverage & Real Assets, Korea	Seoul Management Committee
3.0	11/19/2025	Addition of Addendum and format changes to comply with Global Governance Management Framework Policy	Myung Jin Koo, Head of Compliance, Korea		Seoul Management Committee

## I. General provisions

**Article 1 (Purpose)** The purpose of this regulation (hereinafter referred to as "Regulation") is to establish the standards and procedures to be observed when Natixis Asia Limited Seoul Branch (hereinafter referred to as "Company") and executives, employees, etc. of the Company conduct sales activities such as solicitation of conclusion of a contract, conclusion of a contract, etc. for investment products, etc. to financial consumers (hereinafter referred to as "customers") by door-to-door sales, etc.

**Article 2 (Scope of application)** ① This standard applies to the extent wherein the Company and door-to-door sales personnel perform activities such as door-to-door sales.

② The application of this standard to professional financial consumers shall be limited to Articles 7 and 8 (1) (excluding item 3) and (2), Articles 9 to 11, Article 13 (excluding item 6 of paragraph (1)), Articles 19 (1) and (2), 21, 24, and 25.

③ Matters not prescribed in in this Regulation shall be governed by the Financial Consumer Protection Act (hereinafter referred to as the "Act"), the Enforcement Decree of the Act, the Supervision Regulations of the Act, the Financial Investment Services and FSCMA (hereinafter referred to as the "FSCMA"), the Enforcement Decree of the FSCMA, the Financial Investment Business Regulations, the detailed enforcement regulations thereof, and the relevant Acts and subordinate statutes (hereinafter referred to as "Related Acts and subordinate statutes, etc.") set by the Korea Financial Investment KOFIA (hereinafter referred to as the "KOFIA") and the Korea Exchange.

**Article 3 (Definitions of terms)** The definitions of terms used in this standard are as follows.

1. The term "investment product" means financial investment products (excluding managed trust contracts and trust contracts without investment potential) pursuant to Article 3 of the Act, discretionary investment contracts and trust contracts.
2. The term "loanable product" means a loan or something similar thereto pursuant to Article 3 of the Act. It is a contract to provide money or other items of property value (hereinafter referred to as "money, etc.") and receive compensation, such as money, etc. or interest related thereto, in the future. This refers to the provision of credit pursuant to Article 72, Paragraph 1 of the FSCMA.
3. The term "door-to-door sales" is a method in which door-to-door sales personnel visit customers. This refers to selling investment and loan products (hereinafter referred to as "products") by recommending customers to enter into a contract or accepting contract subscriptions and concluding a contract (this includes cases where a contract is concluded by attracting customers by encouraging them to enter into a contract at a place other than the place of business or by receiving a contract subscription at the place of business or by using the online media) at a location other than the Company's sales office, branch, or branch office (hereinafter referred to as the "business place").
4. The term "telemarketing" means the sale of products by soliciting customers to conclude a contract by telephone or through signing a contract by obtaining a contract subscription (including cases in which a contract is concluded by attracting customers by telephone or by using an online media).
5. The term "video solicitation sales" means the sale of goods by encouraging customers and Company visiting sales personnel to sign a contract through real-time conversations while seeing each other, or signing a contract by receiving a contract by attracting customers in a way that is recommended through video or by using online media.
6. The term "door-to-door sales, etc." means all sales methods in which a contract is concluded by soliciting the conclusion of a contract for a product in the manner referred to in

- subparagraphs 3 through 5 or by receiving a contract subscription.
7. The term "door-to-door sales personnel" means an executive officer or investment solicitor of a Company who meets the requirements of Articles 4 and 5 and performs the business of door-to-door sales, etc.
  8. The term "investment solicitor" means a person registered with the Financial Services Commission after being entrusted with the business of solicitation of investment by a Company pursuant to Article 51 (3) of the FSCMA. The investment solicitation agent may only recommend the conclusion of a contract and may not re-consign the business to a third party.
  9. The term "product subject to the principle of adequacy" means any of the following financial products.
    - A. Investment products under Article 12 (1) 2 of the Enforcement Decree of the Act
    - B. Loanable products under Article 12 (1) 3 of the Enforcement Decree of the Act

## II. Management of door-to-door sales personnel

**Article 4 (Qualification requirements for door-to-door sales personnel)** Door-to-door sales personnel must meet all of the following requirements. However, if there is no qualification requirement prescribed by the relevant laws and regulations in relation to subparagraph 2, subparagraph 2 shall not apply.

1. Shall be Company's executives and employees or an investment solicitor entrusted with the business of investment solicitation by the Company
2. Shall be registered as a financial investment professional for each product subject to door-to-door sales, etc. pursuant to Article 2-1 of the Regulations on Investment Professionals and Qualifying Examinations (hereinafter referred to as the "Investment Professionals Regulations") or registered as an investment solicitor pursuant to Article 3-20 of the Investment Professionals Regulations
3. Shall complete the door-to-door sales personnel pre-training organized by the KOFIA
4. Shall complete job training organized by the KOFIA at least once a year

**Article 5 (Door-to-door sales personnel job training)** ① Pre-training that door-to-door sales personnel must complete should include the following.

1. Work ethics and sales etiquette related to door-to-door sales
  2. Matters to be complied with during door-to-door sales
  3. Prohibited behaviors of door-to-door sales personnel
  4. Relevant laws such as the "Act on Door-to-Door Sales," etc.
  5. Other precautions related to door-to-door sales, etc.
- ② Job training shall be aimed at door-to-door sales personnel, and shall consist of contents equivalent to prior education under paragraph (1).
- ③ The year in which pre-training has been completed is deemed to be equivalent with completing the job training.

**Article 6 (Door-to-door sales personnel list management)** The Company shall prepare a list of its door-to-door sales personnel (hereinafter referred to as "list") in accordance with attached Table 1 and maintain and manage it.

- ② The Company should ensure that the door-to-door sales personnel that intends to do door-to-door sales, etc., can be checked at any time when the customer requests identification.
- ③ The Company shall designate a working-level employee and a manager to maintain the accuracy and timeliness of door-to-door sales personnel information on the list.
- ④ The Company shall inspect the appropriateness of the list management at least once a year, and shall take appropriate measures, such as supplementation, if necessary.

## III. Matters to be observed when conducting door-to-door sales, etc.

**Article 7 (Pre-guidance on door-to-door sales, etc.)** ① Door-to-door sales personnel shall inform the customer of the plan to conduct door-to-door sales, etc. through telephone, text message, etc. in advance before conducting door-to-door sales, etc. to the customer.

- ② When a door-to-door sales personnel guides customers pursuant to paragraph (1), he/she shall guide them, including the following matters.
  - 1. Path of acquisition of customer's personal information
  - 2. Door-to-door sales personnel's affiliation and name, and type of product to be sold
  - 3. Time and place to conduct door-to-door sales, etc.
  - 4. In the case of an investment solicitor, the fact that it is only possible to recommend the conclusion of a contract
- ③ When the Company guides the identity of the door-to-door sales personnel to the customer pursuant to paragraph (2) 2, it shall allow the customer to check it through the Company's website, etc.
- ④ Where a customer who has received prior guidance pursuant to paragraph (1) refuses door-to-door sales, etc., or intends to change the time, place, etc. to conduct door-to-door sales, etc., the Company shall comply therewith.

**Article 8 (Procedures for door-to-door sales, etc.)** ① Door-to-door sales personnel shall guide the following matters when initiating door-to-door sales, etc.

- 1. The fact that door-to-door sales, etc. are for the solicitation of a contract for a product or the conclusion of a contract
- 2. Door-to-door sales personnel's affiliation and name, type and content of the product to be sold
- 3. The fact that the customer has the right to prohibit the Company from visiting or contacting through the phone for the purpose of soliciting the conclusion of a contract, and the method and procedure of exercise.
- ② The Company shall immediately comply with the customer's request under paragraph (1) 3.
- ③ Door-to-door sales personnel should inform the customer that the process of door-to-door sales is recorded (referring to recording in the case of video solicitation sales) and proceed with the recording.
- ④ If a customer refuses the recording, he/she shall be re-informed of the fact that it may be disadvantageous to remedy the right due to the difficulty of securing evidence in future civil complaints or disputes, and where the customer refuses the recording regardless, door-to-door sales, etc. shall be stopped.
- ⑤ Door-to-door sales personnel should use tablet PCs, Company websites, etc. to prove their affiliation to customers and guide them on the range of products they can deal with.
- ⑥ Door-to-door sales personnel should check whether the customer wants to be made an investment recommendation. Door-to-door sales personnel must not engage in any action that constitutes investment recommendation to customers who do not wish to receive investment recommendation, and must provide only objective information requested by the customer.
- ⑦ When a customer receives an investment recommendation or wishes to purchase a product subject to the adequacy principle, door-to-door sales personnel must have the customer fill out an investor information confirmation form to identify investor information and investor tendencies and provide it to the customer without delay.
- ⑧ Unless there is a separate request from the customer to change investor information, door-to-door sales personnel may assume that investor information has not changed during the period of validity (12 to 24 months) from the date the investor information is obtained, and may proceed with door-to-door sales, etc. without completing the confirmation form in accordance with paragraph (7).
- ⑨ Door-to-door sales personnel cannot recommend signing a contract for a product with a higher risk than the customer's investment propensity, and nevertheless, if a customer subscribes for a product with a higher risk than his or her investment propensity, the customer shall have the confirmation such as "confirmation of investment product transactions that are not suitable for investment propensity" filled out. At this time, door-to-door sales personnel should inform the customer so that he or she can fully understand the purpose and precautions of the confirmation, such as the fact that the product is not suitable for the customer.
- ⑩ Notwithstanding paragraphs (7) and (9), in case of telemarketing and video solicitation sales, door-to-door sales personnel shall guide customers to prepare confirmations under paragraphs (7) and (9) directly using electronic media or methods such as their HTS, MTS, and telephone recording methods.

- ① When a door-to-door sales personnel receives a customer's expression of intention to subscribe to a product that does not fit the investment propensity, it shall undergo confirmation from the Company's manager (person in charge of the Company's decision regulations, etc.).
- ② Door-to-door sales personnel must check for itself whether procedures such as door-to-door sales, such as conformity, adequacy principles, and explanation obligations, have been properly implemented before signing a contract.

**Article 9 (Issuance of contract documents, etc.)** When entering into a contract with a customer, door-to-door sales personnel shall, without delay, provide the customer with contract documents (contracts, terms and conditions, instructions, etc.) for the product in writing, mail, e-mail, and other similar electronic communication methods.

- ② Where there is a dispute with a customer regarding any of the following in relation to the issuance of contract documents under paragraph (1), the Company shall prove it.
  1. Provision of contract documents
  2. Fact and timing of the conclusion of the contract
- ③ Door-to-door sales personnel shall sign the fact that the contents of the actual manual are the same as those described to the customer in the manual (including electronic signatures under subparagraph 2 of Article 2 of the Electronic Signature Act; hereinafter the same shall apply) and provide it to the customer: Provided, that any of the following contracts shall be excluded.
  1. A contract for a loanable product
  2. Contracts in which services are provided only through automation using electronic devices under the Electronic Financial Transactions Act

**Article 10 (Use of appropriate contract documents, etc.)** ① Door-to-door sales personnel shall perform door-to-door sales, etc. using contract documents that have undergone procedures in accordance with relevant laws and internal control standards in order to provide suitable products to customers and faithfully fulfill their duty to explain.

- ② Door-to-door sales personnel must use contract documents (terms, contracts, manuals, etc.) that have been deliberated in advance by the Chief Consumer Officer (or the Head of Compliance) when performing door-to-door sales, etc.
- ③ Door-to-door sales personnel shall use advertisements that have undergone procedures prescribed by relevant laws, such as prior deliberation by the Head of Compliance, for advertising activities.

**Article 11 (Obligation of Investment Solicitor to notify, etc.)** ① When the Investment Solicitor performs the solicitation of the conclusion of the contract, the following matters shall be notified to the customer in advance.

1. Name and business details of the Company that entrusted the investment recommendation
  2. The fact that the investment recommendation was entrusted by one Company
  3. The fact that he or she is not authorized to enter into a contract
  4. Matters concerning liability for damages under Articles 44 and 45 of the Act
  5. The fact that he or she cannot receive benefits as a result of the exercise of the contract, such as investment funds
  6. The fact that credit or personal information provided by the customer is retained and managed by the Company
  7. The fact that he or she shall not demand or receive money or other property benefits other than the fees set by the Company when performing the investment solicitation business
  8. The fact that he or she cannot trade customer's financial instruments on their behalf
- ② When conducting an investment solicitation business, an investment solicitor must post a sign indicating that he or she is an investment solicitor or show a certificate to the customer.

**Article 12 (Checking the appropriateness of sales procedures)** ① When the Company enters into a contract with a customer for a product through door-to-door sales, etc., it shall check with the customer whether the sales procedure has been properly implemented within seven business days from the date the contract is signed in accordance with the methods and procedures prescribed by the relevant laws, etc., and the Company's investment recommendation rules and internal

control standards.

- ② The Company shall record and store the results of confirmation under paragraph (1).

#### IV. Prohibited acts of door-to-door sales personnel, etc.

**Article 13 (Prohibited acts)** ① Door-to-door sales personnel shall not engage in any of the following acts when conducting door-to-door sales, etc.

1. Any act of recommending or concluding a contract for a financial product other than the product for which the door-to-door salesperson can recommend or conclude a contract.
2. The act of signing a contract on behalf of a customer or being entrusted with the right to trade from the customer
3. Store the customer's information individually or tamper with it ex post
4. The act of receiving cash from a customer
5. The act of unauthorized access or utilization of the customer's personal information for purposes other than the scope agreed upon by the customer
6. Failure to inform the customer of the withdrawal of the subscription or preventing the customer from sending a document, etc. to prevent the customer from exercising it
7. The act of forming a specific money trust with a specific product (referring to a product in which the trust business entity determines the specific management method of the trust property in advance, making it virtually difficult for the trustor to specify the management method for the trust property) and soliciting a contract through door-to-door sales, etc.
8. Other prohibited acts prescribed by relevant Acts and subordinate statutes, etc.

② The Company and door-to-door sales personnel shall not engage in any of the following activities in order for the customers to maintain a peaceful life.

1. The act of continuing to solicit a contract related to door-to-door sales, etc. even though the customer has expressed refusal.
2. The act of making door-to-door sales, etc. to customers at night (referring to from 9 p.m. to 8 a.m. the following day): Provided, that this shall not apply where requested by a customer.
3. Encouraging a customer who has expressed his or her intention to refuse to accept telemarketing to conclude a contract by telephone

③ The Company must inspect its door-to-door sales personnel for violations of the prohibited acts in paragraphs (1) and (2) at least once a year in accordance with the Company's internal control standards, and take appropriate measures when it detects that its door-to-door sales personnel have violated the prohibited acts. .

④ The Company must record the inspection and action details referred to in paragraph (3) and maintain and manage them.

**Article 14 (Prohibited actions regarding loan products)** While recommending the conclusion of a contract regarding an investment product under Article 3, Paragraph (1), door-to-door sales personnel shall not provide information on the loan product under Article 3, Paragraph (2) or provide related information, if the customer has not requested it.

**Article 15 (Prohibition of re-entrustment of door-to-door sales, etc.)** ① The Company shall not entrust door-to-door sales, etc. to anyone other than its own door-to-door sales personnel.

- ② Door-to-door sales personnel shall not entrust door-to-door sales, etc. to another person or pay fees incurred therefrom.
- ③ Door-to-door sales personnel must not solicit, mediate, or broker contracts with others through multi-level marketing or sponsored door-to-door sales as defined in the Act on Door-to-Door Sales, etc., and receive fees, etc.

**Article 16 (Prohibition of providing gifts and entertainment to customers)** Door-to-door sales personnel must not engage in any of the following acts in relation to providing gifts and entertainment to customers while carrying out door-to-door sales, etc.

1. Providing money, gift certificates, investment products, etc. (hereinafter referred to as "money, etc.") in excess of the standards set by the Company as an inducement to sell products or as a condition for product sales.

2. Providing gifts and entertainment conditional on the change in sales Company or the amount transferred due to the change.
3. Arbitrarily discounting the price or commission of sold products
4. The act of paying or promising to pay part or all of the price or commission of the product sold.
5. In the case of loan products, the act of paying or promising to pay part or all of the loan principal or accrued interest, etc.
6. In the case of retirement pension, providing money, etc. in excess of 30,000 won (applicability applies individually to each user and subscriber)

## V. Customer rights and protection

**Article 17 (Information on how to withdraw a contract, etc.)** ① Door-to-door sales personnel are advised to conclude a contract, or the fact that the right to withdraw a contract can be exercised when the product subject to the contract is subject to the right to withdraw the contract, and the period of exercise, and event methods, etc. must be provided.

- ② Door-to-door sales personnel must inform customers of the fact that, for investment products, if the customer agrees to manage money, etc. within the cancellation period, he or she cannot exercise the 7-day cancellation right. Additionally, confirmation must be obtained directly from the customer through signature, seal, and recording.

**Article 18 (Guidance on methods for terminating illegal contracts)** The Company shall provide information on the fact that the right to terminate illegal contracts can be exercised and how to exercise it for products where illegal contracts can be terminated, as provided for in Article 47 of the Act and related regulations.

**Article 19 (Maintenance, storage and viewing of data)** ① The Company must maintain and store recorded data, etc. in relation to door-to-door sales, etc. for the period specified in relevant laws, etc.

- ② If a customer requests to view recorded data, etc. for the purpose of redressing rights, such as dispute mediation or litigation, the Company must allow the customer to view the relevant data within 6 business days from the date of receipt of the request. However, if there is a justifiable reason why viewing cannot be done within the relevant period, the customer may be notified of the reason and viewing may be postponed, and when the reason no longer exists, viewing must be allowed without delay.

- ③ Special agreements contrary to paragraphs (1) and (2) shall not be entered into.

**Article 20 (Door-to-door sales to the elderly, etc.)** ① Door-to-door sales personnel must confirm whether the customer is a vulnerable financial consumer such as the elderly before commencing door-to-door sales.

- ② In the case of general financial consumers over 65 years of age (hereinafter referred to as the "elderly"), when recommending a product subject to the adequacy principle (excluding cases of direct trading in the market), information regarding the deliberation period (2 business days or more), risk notification during the deliberation period and recording obligations are required to be provided.
- ③ When the Company recommends an investment caution product determined by the Company to the elderly, the Company must ensure that its door-to-door sales personnel concludes the contract after confirming with the Company manager the appropriateness of the contract recommendation, including principles of suitability and appropriateness and contract documents.
- ④ When carrying out the procedure pursuant to paragraph (3), door-to-door sales personnel must inform the elderly person that, despite the elderly person's application, the contract is not final and may be delayed or rejected.
- ⑤ Door-to-door sales personnel need to refrain from recommending investment caution products to super-elderly people designated by the Company, and if super-elderly people want to sign up for products on their own, they must guide them so that they can receive help from family members, etc.

**Article 21 (Personal information protection)** ① The Company shall comply with relevant laws, etc. in collecting, utilizing, and providing personal information, and shall make every effort to educate and secure door-to-door sales personnel so that personal information is not leaked and does not harm customers.

- ② The Company must confirm whether the method and procedure for consenting to the provision and use of personal information by affiliated companies is legal.
- ③ Except in cases stipulated by law, the Company and door-to-door sales personnel must not use customer information acquired in the course of business for purposes other than door-to-door sales without the customer's consent, and shall not disclose it to outside parties in any form.
- ④ The Company and door-to-door sales personnel must not make or leave out more copies of documents containing customer information than necessary, and unnecessary documents must be discarded without delay.
- ⑤ Door-to-door sales personnel must ensure that the customer (including the agent if there is an agent) does so in person when the customer's signature or password entry is required in the process of soliciting or concluding a contract.

## **VI. Establishment of compliance check and management system with related laws and regulations**

**Article 22 (Inspection of compliance with relevant laws, etc.)** ① The Company must periodically check whether related tasks such as recommending products and concluding contracts by door-to-door sales personnel are faithfully complying with relevant laws and regulations.

- ② The Company must prepare and implement detailed procedures including inspection methods pursuant to paragraph (1) and measures to be taken when confirming the fact of illegal acts.

**Article 23 (Establishment of a management system)** The Company must establish and operate a management system to periodically check whether door-to-door sales personnel handle investor information and contract documents illegally or unfairly, and whether there is any unfair solicitation during the sales process.

## **VII. Others**

**Article 24 (Jurisdiction court)** ① If a lawsuit arises between the customer and the Company (including door-to-door sales personnel) regarding a dispute arising from a financial product contract through door-to-door sales, etc., the district court with jurisdiction over the customer's address at the time of filing the lawsuit shall have exclusive jurisdiction. If there is no address, the local court with jurisdiction over the place of residence shall have exclusive jurisdiction. However, if the customer's address or residence is unclear at the time of filing the lawsuit, the Civil Procedure Act shall apply.

- ② When a door-to-door salesperson concludes a product contract through door-to-door sales, etc., he/she shall guide the contents to the effect under paragraph (1).

**Article 25 (Other matters)** The Company and door-to-door sales personnel shall comply with the Company's Internal Control Standards and Investment Recommendation Standards pursuant to Article 16 of the Act and Article 50 of the FSCMA, but the Regulation shall be given priority to matters that conflict with the Regulation.

[Table 1]

Door-to-door sales personnel list

### **■ Door-to-door sales personnel information**

Affiliated Company:

Name:

Contact:

E-mail:

**■ Registration status of financial investment professionals · Investment Solicitors**

Financial investment professionals ( )	Type : Registration date : Type : Registration date : Type : Registration date :
Investment Solicitor ( )	Type : Registration date : Type : Registration date : Type : Registration date : ※Product contracts cannot be concluded; only investment recommendations are possible.

**■ Training completion status**

Door-to-door sales personnel pre-training	Completion (Y/N) Completion date:
Job training	Completion (Y/N) Completion date: