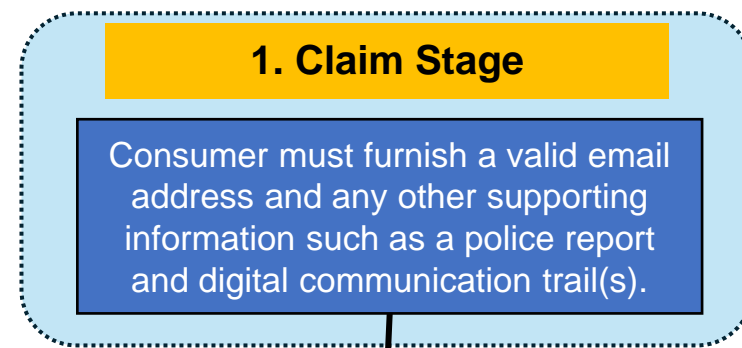


Operational Workflow of the Shared Responsibility Framework



Does the claim involve a covered phishing scam?

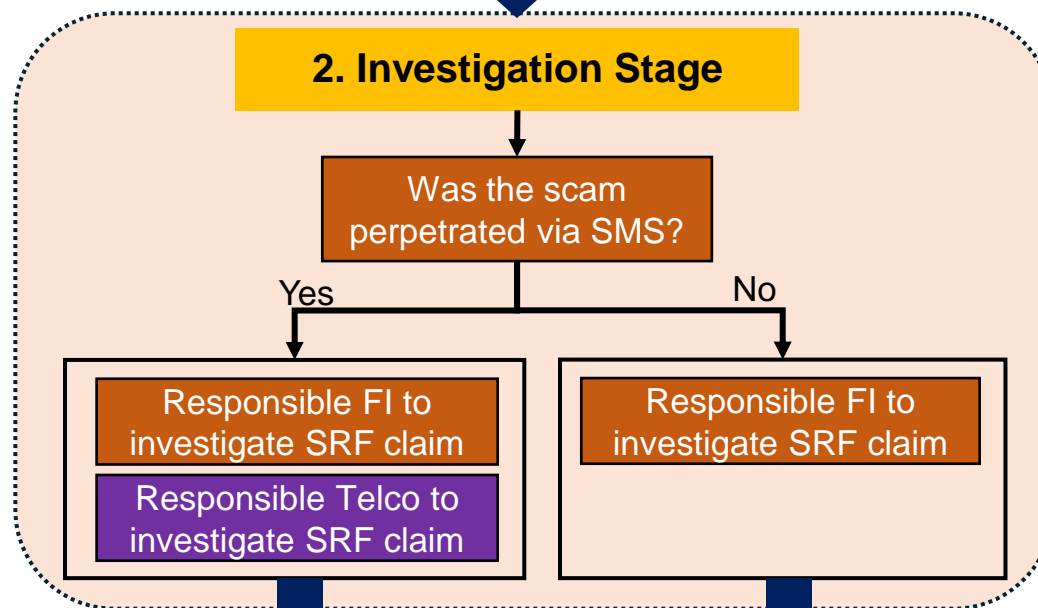
No

Yes

Existing Investigation and Dispute Resolution Process

Responsible FI should investigate the claim per its existing investigation and dispute resolution process.

If consumer is dissatisfied with the responsible FI's assessment / investigation outcome, consumer may approach FIDReC



For scams perpetrated via SMS

3. Outcome Stage

For scams not perpetrated via SMS

Responsible FI / Telco inform victim of outcome of investigation, keeping responsible Telco / FI in the loop

If FI breaches SRF duties

If FI has not breached, and Telco has breached SRF duties

If neither FI nor Telco have breached

Responsible FI expected to bear the loss in full

Responsible Telco expected to bear the loss in full

Consumer bears the loss in full

Responsible FI informs victim of outcome of investigation

If FI breaches SRF duties

If FI has not breached its SRF duties

Responsible FI expected to bear the loss in full

Consumer bears the loss in full

If consumer is dissatisfied with the outcome

4. Recourse Stage (existing avenues of dispute resolution)

Victim complains to IMDA

Victim complains to MAS or appeals to FIDReC

IMDA assesses whether responsible Telco has breached SRF duties

FIDReC's assessment includes non-SRF related obligations, e.g., obligations under statute, common law, or duties under the EUPG (specific to FIs and consumers)