



Trafalgar Marine Trades

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| Date Fair Value Outcome Completed | Quarter 1 2024 |
| Expected Date of Next Assessment | Quarter 1 2025 |

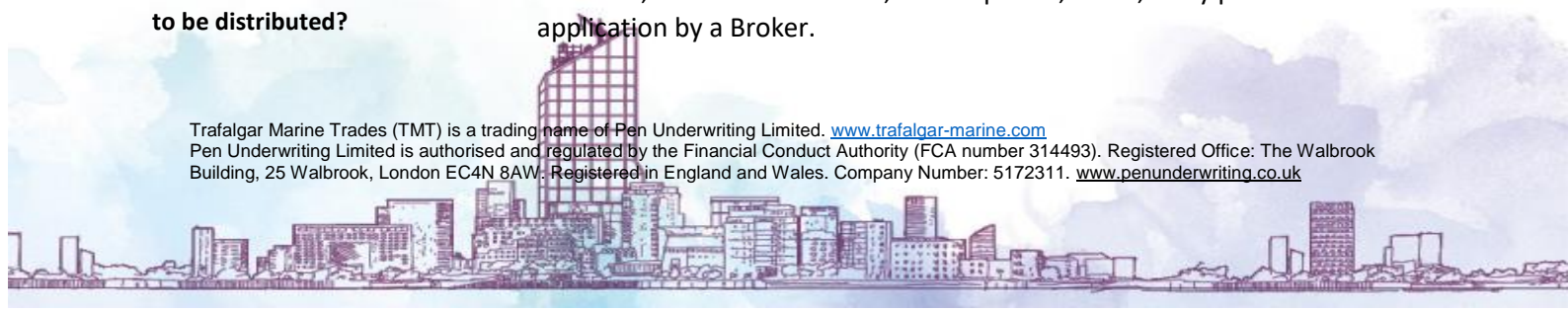
Outcome of the Product Review and Fair Value Assessment

As a result of the product governance activities undertaken across this product we can confirm:

1. The outcome of the fair value assessment found that this product provides fair value, which is based on Pen's review of information related to sales practices and services, claims, complaints and market intelligence.
2. There is no evidence that the product is not suitable for the customers it is intended to be distributed to.
3. The intended distribution strategy remains appropriate, subject to distributors not charging customers additional fees that bear no reasonable relationship to the service(s) provided, or the overall cost of the product.

Target Market Statement

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| Product Type | This is a Commercial Combined liability insurance product suitable for a range of customers from SMEs to large multinational corporations and (re)insurers within the marine industry. |
| What demands and needs are met by this product? | This product is designed for businesses who operate within the marine industry, across a range of sectors. |
| Who is this product designed for? | This product is designed for companies and sole traders within the maritime industry. |
| Who is this product not suitable for? | This product is not suitable for consumers or any customers domiciled within a sanctioned territory; customers who have zero exposure to working within the marine industry; customers who have marine liability policy in place elsewhere. |
| How do we expect this product to be distributed? | This product is suitable to be distributed via a variety of sales channels, such as face to face, via telephone, email, or by postal application by a Broker. |





What are the distributor value considerations?

We expect all distributors in the chain to consider the following when selling Pen's products:

- The impact on product value of offering other products alongside this one, especially those with proportionally greater remuneration. For example, an ancillary product, elements of which may duplicate existing cover, or premium finance charged at an elevated rate of APR.
- Additional commission, fees or charges added as part of distribution processes must be proportionate to the service provided, in line with those charged elsewhere, and not affect the overall value offered by the product.
- Distributors must ensure there is no duplication of cover as a result of any add-on products sold, including premium finance cover, where appropriate cover is already provided by the policy.
- Distributors should consider the Consumer Duty requirements when dealing with policyholders.

Scope

This document is intended to provide an indicative summary of the target market for this product and is not a summary of coverage. Please refer to separate policy documentation for full details of the coverage provided by your product.





Fair Value Outcome Statement

Product Fair Value Outcome – Methodology

Pen has completed Fair Value Assessment work on products we manufacture. This is based on groupings of products which may be similar in features and are intended to be distributed to similar target markets. This Product Fair Value Outcome Statement is not intended to replicate our Fair Value Assessments, but sets out the approach taken and the outcome of the assessment.

Product Information

This is a Commercial Combined Liability insurance product suitable for a range of customers from SMEs to large multinational corporations and (re)insurers within the marine industry.

This product is designed for companies and sole traders within the maritime industry:

- Target trades (not exhaustive) ship repairs liability, boat yards, moorings, storage, marinas, harbour commissioners, boat/yacht builders/sales/servicing and repairs, new and second hand vessel sales, marine equipment manufacture/sales/servicing and repairs, riggers and sailmakers, sailing schools and training centres, marine retail, marine trade associated with private and pleasure craft and small commercial vessels, boat clubs, rowing clubs and sailing clubs, marine engineering, RYA Training Centres, material damage, property and tools.
- Coverage can be further extended to cover liability to others, who is an employee, contractor or related company in connection with the insured services.

The businesses can be located worldwide apart from the US

Trafalgar Marine Trades do not provide a standalone policy for employers liability, property, business interruption, money, transit, hull, specified all risks. They are additional coverages offered within the two main liability products.

This product is not suitable for:

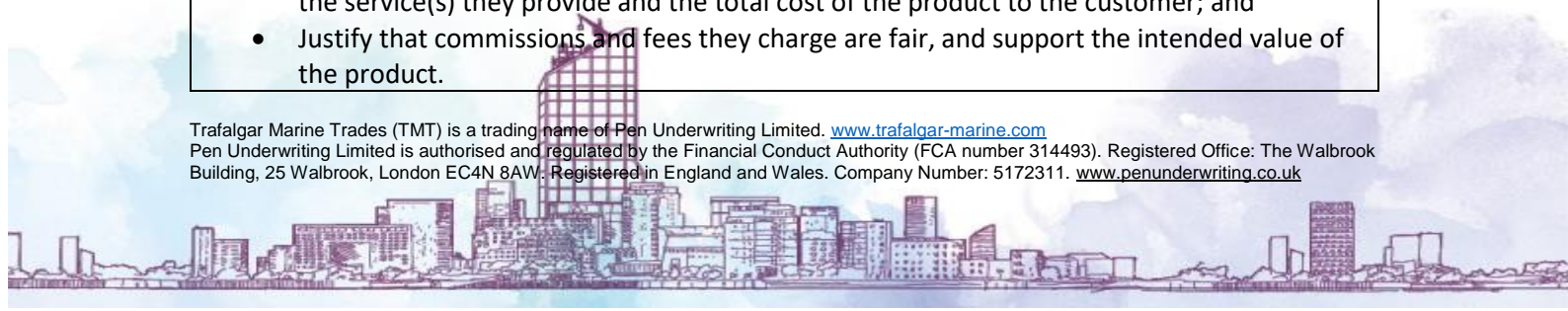
- Any customers domiciled within a sanctioned territory
- Customers who have zero exposure to working within the marine industry
- Customers who have marine liability policy in place elsewhere

Distributor Remuneration

Pen agrees commission rates with each distributor and as part of the fair value assessment process has requested details of any additional fees that may be added in the distribution chain. The fee details received have been analysed and if Pen considers these could impact the value of the product this would be raised directly with distributors.

All distributors should be able to:

- Confirm annually that the commissions and fees they charge are reasonable relative to the service(s) they provide and the total cost of the product to the customer; and
- Justify that commissions and fees they charge are fair, and support the intended value of the product.





How Pen Mitigates Risks to Product Fair Value

Pen's commission structure is intended to ensure that it reflects product features and benefits and the services we provide, which support product fair value. Pen does not benefit from distributors increasing or decreasing their own commissions/fees.

Pen has taken steps to validate that distributor commissions/fees charged are within a reasonable range and in line with usual market practice, in order to ensure the value of our products is not diluted.

How Pen Assesses Value

Pen's product governance and oversight process requires a full review of all product groups at least annually to determine if the product offers fair value to the customer.

These reviews consider the following areas:

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| Target market | <ul style="list-style-type: none"> • Target market reviewed to ensure the product meets the needs of the customer and will continue to do so for the life of the product • Identify the impact on vulnerable customers where applicable |
| Distribution strategy | <ul style="list-style-type: none"> • Appropriateness of the distribution channel, services offered and remuneration • Remuneration does not negatively impact the overall value offered by the product |
| Market assessment | <ul style="list-style-type: none"> • Market scrutiny to ensure the product aligns with current market trends |
| Product design/lifecycle | <ul style="list-style-type: none"> • Pricing • Regulatory requirements • Fees and charges • Product documentation • Performance of the product • Product changes |
| Customer journey | <ul style="list-style-type: none"> • Quality Assurance • Feedback from distribution |
| Claims | <ul style="list-style-type: none"> • Frequency and trends • Loss ratio trends |
| Complaints | <ul style="list-style-type: none"> • Feedback is reviewed to ensure the product continues to offer good benefit for customers • Reasons for complaints and volumes • Outcomes of complaints: whether they are upheld, not upheld • Identification of trends and root causes • Redress payments: volume and timescales • Financial Ombudsman Service: volume and outcomes |

