

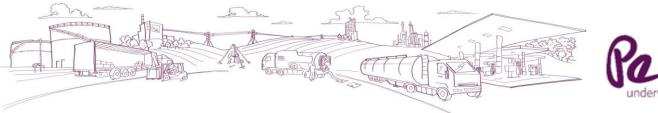
Commercial Combined – Hazardous Goods Industries

Date Fair Value Outcome Completed	Quarter 3 2024
Expected Date of Next Assessment	Quarter 3 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.
- 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.





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 product is designed for commercial customers within the Fuel and Hazardous Goods industries, based in the UK and Republic of Ireland.

Key Coverage

- Property
- **Business Interruption**
- **Employers Liability**
- **Public and Product Liability**
- Money
- Goods In Transit
- Personal Accident
- **Legal Expenses**

Customers have access to the Environmental Claims Response service. The Environmental Claims Response service aims to minimize the environmental impact of incidents and provide comprehensive support throughout the claims and response process.

Product Limitations

- Property & Business Interruption to customer requirements
- £10m /€13.5m Employers Liability
- £10m / €6.5 Public & Products Liability
- Excesses are variable depending on size, make up, risk profile and experience

Key Exclusions

Gradual Pollution such as poor maintenance leading to a leaking valve over a period of time (cover for pollution is only covered on the basis of a sudden, accidental or unidentifiable event).

Optional Products

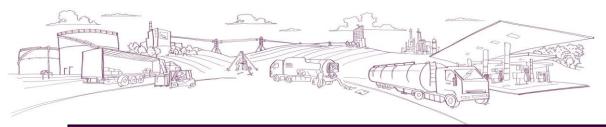
No products are sold alongside this core product by Pen.

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	 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
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Distribution strategy	Appropriateness of the distribution channel, services offered and
	remuneration
	Remuneration does not negatively impact the overall value offered
	by the product
Market assessment	Market scrutiny to ensure the product aligns with current market
	trends
Product design/lifecycle	Pricing
	Regulatory requirements
	Fees and charges
	Product documentation
	Performance of the product
	Product changes
Customer journey	Quality Assurance
	Feedback from distribution
Claims	Frequency and trends
	Loss ratio trends
Complaints	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