

# Willis Towers Watson Motor Fleet Insurance Policy

Target Market Determination (TMD)

<b>Product Disclosure Statement (PDS):</b>	Motor Vehicle Insurance Policy Product Disclosure Statement V10572 - PDS prepared 08 April 2021 – Part 1; and Willis Towers Watson Motor Fleet Insurance Policy Wording 2021 – Part 2
<b>Product:</b>	Motor Fleet Insurance
<b>Original Date:</b>	17/08/2021
<b>Updated:</b>	07/09/2023
<b>Issuer:</b>	AAI Limited ABN 48 005 297 807 trading as Vero Insurance (Vero)
<b>AFSL number:</b>	230859

## 1. What is a Target Market Determination?

A Target Market Determination (TMD) is a determination that Vero has made to:

- describe the class of Customers this product has been designed for;
- specify product distribution conditions;
- specify TMD review periods and triggers; and
- set out reporting requirements.

This TMD assists Vero staff, our Distributors and Customers in understanding the target market for this product.

In this TMD, distribution includes the following conduct in relation to Customers:

- dealing in the product (e.g. issuing or arranging for the product to be issued to a Customer);
- giving a PDS or other regulated disclosure document; and
- providing financial product advice in relation to the product.

## 2. What product does this TMD apply to?

This TMD applies to Comprehensive Cover, Third Party, Fire and Theft Cover, Third Party Legal Liability Only Cover and Own Damage Only Cover offered in the Motor Vehicle Insurance Policy Product Disclosure Statement – Part 1 and Willis Towers Watson Motor Fleet Insurance Policy Wording 2021 – Part 2 PDS and any Supplementary Product Disclosure Statement (SPDS) that we may issue.

## 3. What are the key attributes of this product?

<p>Summary of Key Product Attributes</p>	<p>Customers have a choice of four levels of cover:</p> <ul style="list-style-type: none"> <li>• Comprehensive Cover</li> <li>• Third Party, Fire and Theft Cover</li> <li>• Third Party Legal Liability Only Cover</li> <li>• Own Damage Only Cover</li> </ul> <p>This product provides:</p> <ul style="list-style-type: none"> <li>• cover for loss or damage to a Customer’s vehicles during the period of insurance caused by fire, explosion, lightning, theft or attempted theft for vehicles insured under Fire, Theft and Third Party Liability, as well as loss or damage due to an event covered under the policy including hail, storm (including cyclone) and collision for vehicles insured under Comprehensive Cover and Own Damage Only Cover (note: none of this cover is applicable to vehicles that are insured under Third Party Legal Liability Only Cover);</li> <li>• cover for Third Party Legal Liability for property damage to another person’s property arising from the use of the Customer’s vehicles (note: this cover is applicable to vehicles that are insured under Comprehensive Cover, Third Party, Fire and Theft Cover and Third Party Legal Liability Only Cover).</li> </ul> <p>For full details of the covers available in this product, including the conditions and exclusions that apply, Vero staff should read the PDS which can be found on Sharepoint and Customers should read the PDS which can be obtained from an Australian based and appropriately licensed and authorised broker of Aon Risk Services Australia Limited.</p>
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#### 4. What is the target market for this product?

This product is suitable for Customers who	<ul style="list-style-type: none"><li>• are owners, lessees or are otherwise responsible for the motor vehicle insurance of multiple vehicles, including but not limited to cars, sedans, 4WDs, utilities, vans, trucks, trailers, mobile plant and machinery;</li><li>• are engaged in occupations within our acceptable occupations list;</li><li>• have appointed Willis (in Australia) as their broker for this motor fleet insurance policy;</li><li>• have vehicles that meet our underwriting criteria including:<ul style="list-style-type: none"><li>- are located within an acceptable geographic area;</li><li>- match our list of acceptable makes and models;</li></ul></li></ul>
This product is not suitable for Customers who	<ul style="list-style-type: none"><li>• are not owners, lessees or otherwise responsible for the motor vehicle insurance of multiple vehicles, including but not limited to cars, sedans, 4WDs, utilities, vans, trucks, trailers, mobile plant and machinery;</li><li>• are engaged in occupations that are unacceptable according to our occupation list;</li><li>• have vehicles that don't meet our underwriting criteria including:<ul style="list-style-type: none"><li>- are not located within an acceptable geographic area;</li><li>- are unacceptable makes and models;</li><li>- are used for activities such as taxi, ride-sharing, hire-car or carrying passengers for payment or reward.</li></ul></li></ul>
Customer objectives and needs	<ul style="list-style-type: none"><li>• require and seek protection for accidental loss or damage to the vehicles due to an accident, theft or any other event not excluded by this product;</li><li>• require and seek Third Party Liability cover which provides cover for liability to pay compensation for loss or damage to other people's property arising from the use of the Customer's vehicles; and</li><li>• require a flexible, manually underwritten insurance solution with a limited administrative burden.</li></ul>
Customer Financial Situation	<ul style="list-style-type: none"><li>• are able to pay premiums in accordance with the chosen policy structure, inclusive of any applicable GST, stamp duty, other government charges and any levies that apply.</li></ul> <p>Customers can adjust the premium to suit their circumstances by choosing from a range of excesses, amounts of cover and options.</p>

This product is likely to be consistent with the objectives, financial situation and needs of the Customers in the target market because:

- the product provides cover for the types of loss, damage or liability that Customers in the target market are seeking to insure against;
- the target market for the product covers those Customers who are eligible to receive cover; and
- the product can be tailored to suit individual needs by allowing Customers flexibility to choose from a range of excesses, options and amounts of cover.

#### 5. When will we review this TMD?

We will complete a review of this TMD for this product by no later than the following periods:

- (a) First review period:  
By 17/08/2022.
- (b) Ongoing review periods:  
At least every 2 years following the first review period.
- (c) Significant impact review:  
Within 1 year of the TMD being updated based on a Review Trigger, a significant dealing outside of target market or a material change to the product's distribution channel.

## 6. Other circumstances which will trigger a TMD review

The Review Triggers for this product are:

- if one or more terms of the product are altered and we consider that this alteration reasonably suggests that this TMD is no longer appropriate;
- an event or circumstance occurs that materially changes a factor taken into account when making the TMD that would suggest to us that the TMD is no longer appropriate, such as a change in underwriting requirements;
- the discovery of a material defect in the PDS which reasonably suggests that the TMD is no longer appropriate;
- if feedback, such as significant or systemic complaints or claims issues, is received from a Distributor or Customers who purchased the product, and we consider that this reasonably suggests to us the TMD is no longer appropriate;
- if feedback, regulatory orders or directions received from a regulator, the Code Governance Committee (CGC) or Australian Financial Complaints Authority (AFCA) suggest this TMD is no longer appropriate;
- if a change in law, regulation, or regulatory guidance that materially affects the product design or distribution of the product (or class of products that includes this product) where we consider that this reasonably suggests that this TMD is no longer appropriate;
- where significant dealings outside the TMD occurs, and we consider that this reasonably suggests that this TMD is no longer appropriate;
- if a remediation event relating to this product occurs where we consider this would reasonably suggest that:
  - this product is unsuitable for a particular cohort of Customers; and
  - the TMD may no longer be appropriate.
- if we consider, through our ongoing monitoring of product value data metrics (such as those identified in Section 9 of this TMD), that material deviations have occurred in a combination of data metrics reasonably suggesting that the product is not providing value or the TMD is no longer appropriate.

## 7. What distribution conditions apply to this product?

The following conditions apply to this product:

- this product must only be distributed by an Australian based and appropriately licensed insurance broker (Distributor) with which Vero has an agreement to distribute this product;
- those Distributors who distribute the product are required to be authorised by us to distribute this product and those arrangements must not be cancelled or suspended;
- this product must only be distributed in accordance with this TMD;
- distribution of this product must comply with all of our underwriting criteria;
- distribution of this product must be conducted through Distributors pursuant to specific channel distribution requirements;
- this product cannot be distributed where this TMD is not up to date and no new TMD has been published; and
- the TMD must be current and not subject to any Australian Securities and Investments Commission (ASIC) action that might suggest the TMD is no longer appropriate.

Business processes including reasonable platform controls (such as knockout questions) and quality assurance programs are designed to ensure that the product is distributed to Customers within the target market in line with the above distribution conditions.

## 8. When do Third Party Distributors who distribute our products need to report complaints about this product to us?\*

Third Party Distributors who distribute our products need to provide us information on complaints made about this product on a Quarterly basis (**Complaints Reporting Period**).

Third Party Distributors who distribute our products are required to provide to us this complaints information within 10 business days of the end of the Complaints Reporting Period.

All complaints lodged with us are handled in accordance with Suncorp's Group Complaint Management Standard.

\*This section 8 only applies to products distributed by Third Party Distributors

## 9. Information to assess TMDs and reporting periods

The table below sets out the kinds of information we need to identify, or those that Distributors who distribute our product need to provide to us, to enable us to ensure that the TMD for this product continues to be appropriate.

Information	Persons required to report	Reporting period
Complaints feedback including: <ul style="list-style-type: none"><li>• Nature of complaints</li><li>• Number of complaints</li><li>• Product category</li></ul>	Distributors / Issuer	Quarterly
Claims data including: <ul style="list-style-type: none"><li>• Average claims costs</li><li>• Claims acceptance rates</li><li>• Claims frequency</li><li>• Loss ratios</li></ul>	Issuer	Quarterly
Annual Product Review outcomes	Issuer	Annually
Sales information including: <ul style="list-style-type: none"><li>• Strike rates</li><li>• Cancellation rates</li><li>• Exception reporting</li></ul>	Issuer	Quarterly
Dealings of product outside of TMD	Distributors / Issuer	As soon as practicable but within 10 business days
Any feedback, regulatory orders or directions received from a regulator, CGC or AFCA in respect of the product or its distribution	Distributors / Issuer	As soon as practicable but within 10 business days



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