

# Commercial Motor Insurance Policy

Target Market Determination (TMD)



<b>Product Disclosure Statement (PDS):</b>	Commercial Motor Insurance Policy Steadfast Client Trading Platform Product Disclosure Statement V11474 25/03/24 A - PDS prepared 25 January 2024
<b>Product:</b>	Commercial Motor Insurance
<b>Original Date:</b>	25/03/2024
<b>Updated:</b>	Not Applicable
<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 general advice.

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

This TMD applies to Comprehensive Cover, Legal Liability, Fire and Theft Cover and Legal Liability Cover offered in the Commercial Motor Insurance Policy Product Disclosure Statement & Policy Wording and any Supplementary Product Disclosure Statement (SPDS) that we may issue.

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

Summary of Key Product Attributes	<p>This product provides insurance cover for vehicles used in the Customer's business with a choice of three levels of cover:</p> <ol style="list-style-type: none"> <li>1. Comprehensive Cover which covers the accidental damage to the Customer's vehicle and includes Legal Liability Cover;</li> <li>2. Legal Liability, Fire and Theft Cover which covers the vehicle against a specific range of insured events and includes Legal Liability Cover; or</li> <li>3. Legal Liability Cover only which covers supplementary bodily injury and damage to third party property liability only.</li> </ol>
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#### 4. What is the target market for this product?

This product is designed to be consistent with the likely objectives, financial situation and needs of Customers who:

Eligibility	<ul style="list-style-type: none"><li>• operate an Australian-based business on an ongoing basis;</li><li>• have motor vehicles used as part of their business;</li><li>• predominantly have fewer than 15 vehicles (including but not limited to cars, sedans, 4WDs, utility vehicles, trucks, trailers, mobile plant and machinery);</li><li>• have vehicles that meet our underwriting criteria including:<ul style="list-style-type: none"><li>- located within an acceptable postcode area; and</li><li>- match our list of acceptable makes and models; and</li><li>- meet our acceptable physical condition criteria; and</li></ul></li><li>• are engaged in business activities that are acceptable to cover under Vero's underwriting guidelines.</li></ul> <p>This product is not designed for Customers that have vehicles that do not meet our acceptability criteria for location, make, model or physical condition.</p>
Customer objectives, financial situation and needs	<p>Comprehensive Cover:</p> <ul style="list-style-type: none"><li>• require and seek insurance cover:<ul style="list-style-type: none"><li>- for the loss or damage to the Customer's business vehicle up to the market or agreed value; and</li><li>- for Legal Liability (see below);</li></ul></li></ul> <p>Legal Liability, Fire and Theft cover:</p> <ul style="list-style-type: none"><li>• require and seek insurance cover:<ul style="list-style-type: none"><li>- for the loss or damage to the Customer's business vehicle from a limited range of insured events; and</li><li>- for Legal Liability (see below);</li></ul></li></ul> <p>Legal Liability Cover only:</p> <ul style="list-style-type: none"><li>• require and seek legal liability insurance cover for damage the Customer's business vehicle causes to other people's vehicles and property.</li></ul>
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. Customers can adjust the premium to suit their circumstances by choosing from a range of excesses, amounts of cover and options.</li></ul>

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 product can be tailored to suit individual needs by allowing Customers flexibility to choose from a range of excesses, options and amounts of cover; and
- the target market for the product covers those Customers who are eligible to receive 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 25/03/2025.
- (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 Australian based insurance brokers from the Steadfast Group Limited ABN 98 073 659 677;
- those Distributors who distribute the product are required to be authorised by us to distribute this product and those arrangements must not have been 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;
- our Distributors must distribute this product through our policy administration system;
- 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 underwriting 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, as required by the Treasury Laws Amendment (Design and Distribution Obligations and Product Intervention Powers) Act 2019	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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AAI Limited ABN 48 005 297 807 AFSL 230859 trading as Vero Insurance V11486 25/03/24 A