

A background network diagram consisting of numerous small grey dots connected by thin, light grey lines, forming a complex web of connections. The dots are scattered across the page, with a higher density in the upper right and lower right areas. In the bottom right corner, there are two overlapping, light teal circular shapes.

doa

Consumer Duty

Partner Update

April 2023

CONSUMER DUTY STRUCTURE

Consumer
Principle

A firm must act to deliver good outcomes for retail customers

Overarching Cross-
Cutting Rules

Firms must:

- Act in good faith towards retail customers
- Avoid causing foreseeable harm to retail customers
- Enable and support retail customers to pursue their financial objectives

Four Outcomes

1. Products and services
2. Price and Value
3. Consumer Understanding
4. Consumer support

CONSUMER DUTY OUTCOMES

1 - Products and services

To ensure products are designed to meet the needs, characteristics and objectives of a target group of customers and are distributed appropriately.

2 - Price and value

To ensure that products and services represent fair value for customers and are priced fairly, according to the benefits they provide to customers.

3 - Consumer Understanding

To ensure that firms support and enable consumers to make informed decisions about financial products and services.

4 - Consumer support

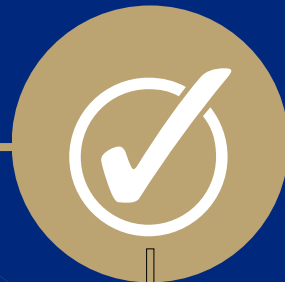
To ensure customers can get the help they need when they need it, with no unnecessary obstacles.

IMPLEMENTATION PLAN AND PROGRESS



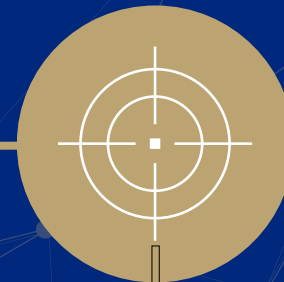
31st October 2022

Implementation Plan has been created and signed off by the board



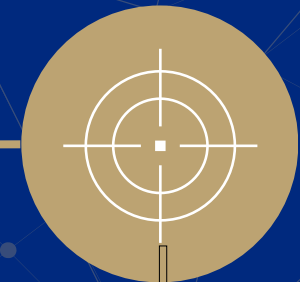
30th April 2023

Completed a review of our products where a 'Co-Manufacturer'



31st July 2023

Ensure all 'open' products are compliant with the new Consumer Duty and actions taken where not



31st July 2024

Ensure all 'closed' products are compliant with the Consumer Duty and actions taken where not

MANUFACTURER REVIEW - April 2023

Good customer outcomes apply to all aspects of our operations and culture and we are committed to delivering these for our customers. In line with the 30th April 2023 deadline, we have completed necessary reviews against the outcome rules for existing products where we are 'Co-Manufacturer' and are sharing this summary with 'Distributors' to meet the obligations under the new Duty.

Please see our dedicate Product Oversight & Governance [webpage](#) for a full list of products where we are 'Co-Manufacturers' and accompanying Fair Value Assessment (FVA) documents.

To meet our obligations under the Duty, we have specifically considered:

- The nature of these products; which are all Commercial General Insurances for 'SME' and larger 'Commercial Clients'. We are not product 'Manufacturers' for any 'Consumer' products.
- The complexity of the products; which are not high-complex or high-risk, and as detailed within our FVAs dated March 2023.
- The characteristics of end customers; have been considered and detailed within our FVAs dated March 2023.
 - As 'Commercial Clients', the likelihood of potential vulnerability is low however we still maintain full consideration, procedures and training to identify potential vulnerability.

- Our relationship with end customers; which is one of a 'non-direct' basis as all sales are via regulated sub-brokers. Whilst we do not have direct correspondence with customers, it is important we continue to ensure we understand our role and ability to influence Retail customer outcomes.
- Our existing robust work under PROD 4- Product Governance Rules; to ensure our products provide fair value with a reasonable relationship between the price customers pay, and the benefit they receive, ensure that we meet Consumer Duty Outcomes 1) Products & Services and 2) Price & Value.
- Our communications and documents; whilst we do not correspond directly with end customers, whether our documentation and (broker) communications support customer understanding and equip them to make effective, timely and properly informed decisions (Consumer Duty Outcome 3) Consumer Understanding).
 - Further we believe the information currently provided is done so at the right time and in a way that can be understood to make effective decisions.
 - We will however develop new communication standards and options for those with additional requirements such as age, comprehensibility and visual accessibility. It is however noted that all end customers do have a registered insurance broker working on their behalf who can already assist with relaying such information.
 - Product terms & conditions are in clear language and signed off by Insurer partners.
 - All relevant policy documents contain clear information setting out cancellation rights as well as how to make a complaint.
 - We also plan to undertake spot check reviews of distributor information provided to end customers to ensure clarity throughout the chain, and potential testing capability.

- Consumer Duty Outcome 4) Customer Support; that we continue to provide support that meets consumers' needs throughout the life of the product. Factors reviewed included:
 - Call waiting times for Claims and Complaints departments.
 - Underwriters and Administrative staff availability and response times to assist brokers with policy changes.
 - Our Vulnerable Customer Policy & Procedure, staff awareness and training as well as dedicated Vulnerable Customer Champions in place
 - As mentioned above, we will also consider new communication options to support those with additional requirements such as age, comprehensibility and visual accessibility to help with the delivery of new customer outcomes.

Notwithstanding the above summary review of where we are 'Co-Manufacturers' and by the 30th April 2023 deadline, we are committed to complying with the new Duty and will further relay any additional information that will assist with your obligations under the Duty provided by other Insurer 'Manufacturers'.

ADDITIONAL ASPECTS

- Consumer Duty Implementation Plan created and signed off by the Board ahead of 31st October 2022, which is regularly reviewed and updated to monitor the firms progress.
- Appointed a Board Level Consumer Duty Champion to ensure regular high-level discussions.
- All staff have completed a dedicated Consumer Duty online training module to ensure company wide understanding of our obligations under the Duty.
- Consumer Duty is now a fixed topic in both monthly Director meetings and monthly Product Oversight & Governance meetings.
- We will continue to implement further requirements ahead of 31st July 2023 deadline to ensure full compliance with the Duty across all open products.
- As well as internal MI collated to assist with ongoing monitoring of the Duty, we may also request specific data from partners (both brokers and insurers) to help us oversee compliance throughout the whole distribution chain to ensure positive customer outcomes.
- Further communications will be provided as necessary ahead of 31st July 2023 deadline.
- For any queries in the meantime, please do not hesitate to contact us via our dedicated Product Governance & Oversight email; pog@doainsurance.co.uk