



Product Review Closure Document – Travel

May 2024

1. Review objectives

AXA Partners conducts a full review of the Travel product every 12 months as a minimum, to monitor and review the product continues to meet the demands & needs of our partners' customers or propose and progress adjustments if any findings indicate otherwise. The review also serves to ensure that distribution is appropriate and the target market is reviewed and updated/communicated to partners, whilst also reviewing performance and proposing enhancements.

The objectives of our reviews are:

- To assess if products continue to remain compatible with needs, characteristics and objectives of the target market, or propose variations to the target market driven by customer feedback, regulatory or other change drivers;
- To identify factors and events that could materially impact product features and benefit delivery, as well as changes required to ensure appropriate customer value and that outcomes continue to be delivered;
- To monitor changes in customer outcomes and ensure products continue to fulfil their intended purposes;
- To monitor customer feedback and commentary from any source and identify corrective action required on any area including product, service delivery, claims, onboarding, partner journeys and more;
- To propose and progress corrective action if the target market needs are not being met;
- To review our standard documentation templates and determine their suitability or amend them in light of review findings;
- To monitor product value measures and assess that the metrics are consistently performing within the intended thresholds;
- To evidence and articulate decisions internally and to partners after internal reviews, working together to strengthen conduct and progress positive change for customers; and
- To manage conduct risk across all aforementioned areas, ensuring we identify any factors presenting risk to maintaining appropriate business conduct and take forward mitigating actions, escalation and controls.

2. Areas assessed

During the 2024 Travel review, we have:

- **Assessed our standard T&Cs and IPID**, to maintain a standard set of wordings for the product based on our experience and common customer misunderstandings, driving better value;
- **Reviewed our target market statement and distribution strategy**, preparing a refreshed Target Market Statement document to better help our partners distribute the product and design sales journeys for customer outcome excellence;
- **Sampled sales journeys, policy documentation and IPIDs**, to validate customer communication transparency, fairness and correct product positioning;
- **Reviewed data on claims** frequency, repudiations and key ratios (frequency/net loss ratio and claims acceptance rates), identifying value improvement opportunities; and
- **Considered external factors** and market movements, including regulatory developments, and their impact on our product strategy and value.

3. The Review – Key details

We conducted a review in **April 2024**, and will now work on follow-up actions internally and finalise data analysis accordingly. The below summarises each aspect of our review and the key findings and actions:



Action Area & Aims	Key Findings and Actions
<p>Target Market & Distribution Review</p> <p>To propose variations to the target market driven by customer feedback, regulatory or other change drivers.</p> <p>To propose and progress corrective action if target market needs are not being met.</p>	<ul style="list-style-type: none"> ✓ Reviewed our Target Market Statement (suitable and unsuitable customers) as well as the distribution model list (strategy). ✓ The statement has been updated and approved in our product review. ✓ We found the product does address the needs of the target market. We found no evidence that the product is being sold outside the target market. ✓ We are creating improved Target Market Statements which provide greater clarity of the consumer who will benefit from your product. The 2024 refreshed document will be circulated to you shortly, and your Account Management team will work with you to complete the annual Target Market Statement process.
<p>Sales Journey and Documentation Sampling (inc. IPIDs)</p> <p>To review our standard documentation templates and determine their suitability, or amend them in light of review findings.</p> <p>To identify factors and events which could materially impact our product features and benefit delivery, and changes required to ensure appropriate customer value and outcomes continue to be delivered.</p>	<ul style="list-style-type: none"> ✓ We generally found our distributors explained the product clearly on sales journeys. IPID and policy wordings are provided early in the journey. ✓ Claims processes are clearly documented within the policy wording. ✓ In some cases, policy wordings have been updated to give prominence to contact details making it easier for policyholders to obtain medical assistance from AXA or make a claim or complaint. ✓ Distributors should ensure they are pointing out key exclusions and making the IPID readily available in all sales journeys." ✓ We would encourage all Distributors to take particular care that they are explaining the requirement to declare pre-existing medical conditions clearly to consumers including when the product is sold via a Price Comparison Website.
<p>Claims Performance/Data Review</p> <p>To monitor changes in customer outcomes and ensure products continue to fulfil their intended purposes.</p> <p>To propose and progress corrective action if target market needs are not being met.</p> <p>To monitor product value measures and assess the metrics are consistently performing within the intended thresholds.</p>	<ul style="list-style-type: none"> ✓ Assessed our claims performance and customer value, reviewing data on claims including overall performance, repudiation causes and key factors impacting claim handling. Our assessment found performance to be overall satisfactory. ✓ Claims are generally accepted. Distributors should ensure they are providing clear explanations of the product features and coverage. ✓ Consumers are clearly able to make a claim on their travel insurance using online portals, email, and telephone. Details of how to make a claim are available through policy wordings and distributors' websites.
<p>Complaints Assessment</p>	<ul style="list-style-type: none"> ✓ We performed a review of our complaints data. ✓ Consumers who complain about our travel insurance are more likely to do so because of delays in handling their claim or poor communication rather than the product features or benefits. Our



<p>To propose and progress corrective action if target market needs are not being met. To monitor customer feedback and commentary from any source, and identify corrective action required on any area.</p>	<p>teams are continuing work to improve service.</p>
<p>Regulatory Horizon & Market Monitoring</p> <p>To identify factors and events which could materially impact our product features and benefit delivery, and changes required to ensure appropriate customer value and outcomes continue to be delivered;</p>	<ul style="list-style-type: none"> ✓ Reviewed all FCA regulation, to identify and assess maturity on key regulatory matters involving this GI business line, and any thematic reviews or further topics in the market requiring assessment. ✓ The implementation of GI Value Measures reporting and work under the GI Pricing Practices regulation (including product governance enhancements and auto-renewal transparency) was completed on time and successfully. ✓ Consumer Duty has been successfully implemented for live books. ✓ We continue to monitor the market, to highlight areas where our cover may need changing – and will maintain open communication with all partners. There was no market change in the last 12 months and no product change was deemed required.

4. Next Review and Conclusions

Based on all the evidence and consideration, the Product Review Committee concluded there are no areas with significant corrective action required or potential for regulatory breach, severe customer impact, poor value or other harms.

As a business we have agreed **the product does provide value to consumers.**

The **next full review** will take place in or before **April 2025**. However, we will continue to monitor key ratios and metrics quarterly and commence monitoring our performance against the value measures when published by the FCA. If there are any changes in these conditions, 'red flags' or regulatory changes, the Product Manager or other Committee members may convene an interim review before then.