

# Product Review Closure Document – Single Trip and Annual Multi Trip Travel Insurance

March 2025

## 1. Review objectives

AXA Partners conducts a full review of the Single Trip and Annual Multi Trip Travel Insurance 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 2025 review, we have:

- **Assessed our standard T&Cs and IPID**, to have a 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;
- **Reviewed our complaints data**, KPIs, root causes and trends, including FOS referrals; 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 **Q1 2025**, 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
<b>Competitor Benchmarking</b>  To assess if products continue to remain compatible with needs, characteristics and objectives of the target market, or propose variations.	<ul style="list-style-type: none"><li>✓ Compared key features, benefits, exclusions, indemnity limits, coverage and premium of our standard product against key competitors.</li><li>✓ Our product generally remains comprehensive and in line with the rest of the market.</li><li>✓ Our standards T&amp;Cs remain fit for purpose. Improvements are to follow in the upcoming year to improve readability and accessibility to policy wordings.</li></ul>
<b>Target Market &amp; Distribution Review</b>  To propose variations to the target market driven by customer feedback, regulatory or other change drivers.  To propose and progress corrective action if target market needs are not being met.	<ul style="list-style-type: none"><li>✓ Reviewed our Target Market Statement (suitable and unsuitable customers) as well as the distribution model list (strategy).</li><li>✓ A new TMS template was cascaded and implemented in the past year and will be reissued alongside this review.</li><li>✓ We found our distribution strategy remains suitable and strong, and there is little to no evidence of selling outside intended target customer groups.</li></ul>
<b>Sales Journey and Documentation Sampling (inc. IPIDs)</b>  To review our standard documentation templates and determine their suitability, or amend them in light of review findings.  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.	<ul style="list-style-type: none"><li>✓ We generally found our partners' sales journeys suitably designed and providing information in a manner which does not unduly try to influence purchase behaviour. However, there were elements of feedback shared in 2024 which are being appropriately monitored internally.</li><li>✓ IPIDs and policy wordings are generally suitable for purpose and meeting regulatory requirements. Where necessary, some improvements for IPIDs have been provided to partners. As referenced above there will be changes to policy wordings and IPIDs in the future to enable a greater level of Consumer Support.</li></ul> <p>! Our review highlighted the importance of Distributors clearly explaining the excess and covers within the product.</p>
<b>Claims Performance/Data Review</b>  To monitor changes in customer outcomes and ensure products continue to fulfil their intended purposes. To propose and progress corrective action if target market needs are not being met.	<ul style="list-style-type: none"><li>✓ 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.</li><li>✓ Repudiation analysis highlighted some products where the repudiation rate was high however early indications of recent repudiation rates show an improvement.</li></ul>



<p>To monitor product value measures and assess the metrics are consistently performing within the intended thresholds.</p>	
<p><b>Complaints Assessment</b></p> <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>✓ We performed a review of our complaints data. The majority of complaints were service related in comparison to any product complaints.</p> <p>! Our operators are continuing work to improve service, however it remains a challenging environment.</p>
<p><b>Regulatory Horizon &amp; Market Monitoring</b></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>	<p>✓ Reviewed all FCA and CBI 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.</p> <p>✓ The review of Signposting within travel insurance is being monitored.</p> <p>✓ Value Measures reporting was completed on time and successfully.</p> <p>✓ Consumer Duty remains a key consideration in all elements of the product and service.</p> <p>✓ We maintain a watching brief on any market movement, 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.</p>

#### 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 **Q1 2026**. 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.