

PRODUCT GOVERNANCE AND FAIR VALUE ASSESSMENT

*This summary document has been created to fulfil our responsibilities under fair value regulations. This document **should not** be used as a sales or marketing tool. The client facing broker must act in the best interests of each customer individually when deciding whether to recommend a particular policy or not.*

PRODUCT NAME Care Homes Policy (New India Assurance Co. Ltd)
POLICY WORDING Care Homes Policy (New India Assurance Co. Ltd)
VERSION NUMBER (8/2021)

PRODUCT TYPE	Combined (multi-class) Policy containing Sections for Buildings and Contents, Business interruption, Glass and Sanitaryware, Money, Personal Assault, Refrigerated Stock, Goods In Transit, Employers' Liability, Public Liability, Treatment Liability, Loss Of Registration Certificate, Fidelity Insurance and Computer.
MANUFACTURERS	<p>This product is manufactured by New India Assurance Co. Ltd and they undertake product governance and fair value assessments.</p> <p>The relevant New India Assurance Co. Ltd Product Governance Framework is attached at the back of this document.</p>
MOST RECENT REVIEW	October 2023
TARGET MARKET	<ul style="list-style-type: none"> • Commercial Customers. • Care Homes for the elderly and adults with learning difficulties. • Policyholders, and care homes, in the United Kingdom, Isle of Man or Channel Islands.
OUTSIDE TARGET MARKET	<ul style="list-style-type: none"> • Other Classes of insurance. • Proposers or care homes outside of the UK, Isle of Man and Channel Islands. • Other types of Service User
CHARACTERISTICS OF THE PRODUCT AIMED AT MEETING THE NEEDS OF THE TARGET MARKET	<p>Cover Sections Available:</p> <ol style="list-style-type: none"> 1. Buildings and Contents 2. Business Interruption 3. Glass and Sanitaryware 4. Money, 5. Personal Assault 6. Refrigerated Stock 7. Goods In Transit 8. Employers' Liability 9. Public Liability, 10. Treatment Liability 11. Legal Expenses – <i>not available from Camberford Underwriting</i> 12. Loss Of Registration Certificate 13. Fidelity Insurance 14. Personal Accident – <i>not available from Camberford Underwriting</i> 15. Computer.

Add Ons:

Camberford Underwriting distributes a separate legal expenses product. This is available where requested and is manufactured by Arag plc (target market statements and product governance information for whom is available at www.arag.co.uk). This is NOT the Section 11 (Legal Expenses) of the New India Policy, because the separate Arag product we distribute has wider cover specifically for the care home sector.

Optional Covers

Whilst it is expected that Public/Products Liability coverage will be purchased, the Sections of the product are available optionally – designed to allow proposers and intermediaries to select to suit requirements.

Key Exclusions & Limitations

- Limits of Liability or Sum Insured apply throughout the Product.
- There are conditions which are precedent to Insurer's liability. These oblige the policyholder to act in a certain way or stipulate a contingency upon which the validity of the Policy or a claim depends.

Product Literature

The Policy Wording and Policy Summary are issued with each new and renewal quotation; and samples available upon request to product.governance@camberford.com.

DISTRIBUTION STRATEGY

This product is intended for distribution via FCA authorised brokers only. Brokers must be approved by us and enter into our standard format TOBA. Our preferred method of agreeing TOBAs is via REG. Brokers may access this product via our website enquiry forms or by submitting information by email to our relevant team.

Sub-broking is not permitted.

COMMISSION

We will agree a commission rate with each distributor. All distributors should be able to demonstrate that commission received bears a reasonable relationship to the actual costs of their contribution/level of involvement or benefit added by them to the distribution arrangement. We may ask you to justify your commission rate and if we are not satisfied that it is appropriate we may seek to amend it.

OTHER REMUNERATION

We will charge an Underwriting Fee on any new business or renewal policy taken up. Full details regarding our fees are detailed within quotation and schedule documents. We review our fees annually to ensure that they remain appropriate.

We may ask you provide details of remuneration you earn in connection with the sale of our policy. This includes any fees, premium finance earnings, earning from non-insurance products or add-ons sold alongside our policy.

You must ensure that your arrangements are consistent with FCA rules on conflicts and incentives. You should review all remuneration arrangements at least annually and share the outcome of that review with us on request.

FAIR VALUE REVIEW

New India Assurance Co. Ltd, as product manufacturer, have their own product governance process (this is attached).

Our product governance process requires a full review of all products at least annually to determine if the product offers fair value to the end customer. These reviews consider the target market, distribution strategy, remuneration, marketing, product information, product performance, product design and feedback from distributors and customers.

We also monitor conversion rates, renewal retention, cancellations, loss ratios, claims and complaints as part of this review process.

We are satisfied that the product offers fair value to its intended Target Market, subject to distributors:

- not charging customers additional amounts over and above the gross premium plus underwriting fees quoted by us without first determining that they do not have a detrimental effect on the value of the product.
- ensuring that no duplicate cover exists or is caused by an add-on where that cover is already provided by the policy.

CUSTOMERS FOR WHOM THE PRODUCT IS NOT EXPECTED TO PROVIDE FAIR VALUE

This product would not be expected to provide fair value to policyholders / risks that fall outside the Target Market.

RELEVANT DOCUMENTS AVAILABLE

- Policy Wording
- Policy Summary

Please contact product.governance@camberford.com for samples.

We welcome any feedback from our distributors on the performance of our products. All feedback will be considered in our next product review.

If you believe that your staff would benefit from additional training on this product please let us know by making contact by email to product.governance@camberford.com.



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Dear Business Partner,

I would like to take this opportunity to thank you for your continued support and for being a valued partner of our company. We appreciate your commitment to providing the best possible service to your clients and we look forward to our continued partnership.

As you are aware, the Financial Conduct Authority (FCA) has introduced the Consumer Duty, which requires insurers to comply with increased product governance obligations and ensure that their products are distributed in the best interests of customers. As an insurer, we take our obligations seriously, and we have taken steps to ensure that all of our products meet the requirements set out by the FCA.

To confirm our commitment to the Consumer Duty, we have prepared a template which outlines our product review process and confirms that our products have been designed and distributed in accordance with the needs, characteristics, and objectives of the target market. Specifically, we confirm that:

- We are product manufacturers.
- We have reviewed all of our products to ensure that they are suitable for their intended target market and meet the needs of customers within our target market.
- We have also analysed our pricing structure and have ensured that our pricing structure is in line with the needs of the target market and we are providing fair value to customers.
- We have simplified our policy wordings to make them easier to understand and we will be sending the same to you soon.

As a distributor of our general insurance products, we expect you to also comply with the requirements of the Consumer Duty. We kindly request that you review this template in accordance with the terms of our business agreement and provide your confirmation as soon as possible.

We believe that this template will help us to work together more effectively to meet our regulatory obligations and to provide the best possible service to our customers. If you have any questions or concerns about the FCA regulations or our obligations under them, please do not hesitate to contact us. .

With kind regards,



(Mukta Sharma)

Chief Executive,

24 April 2023

CARE HOME INSURANCE

This specially developed policy lets you get on with your day-to-day business and leaves us at New India to deal with the unexpected. Designed specifically for Care Homes, it combines your essential business insurances in one document. For more information, you may access <https://www.newindia.co.uk/care-homes/> ..

GENERAL – Care Home Insurance

As a product manufacturer, we will provide you with certain information to support you in conducting an assessment of the product.

This document sets out appropriate information in respect of:

- insurance product(s).
- identified target market for the scheme and insurance product(s).
- product approval process.

This information is intended to provide you with appropriate information to support you in:

- Understanding the characteristics of the insurance product(s) and its(their) intended value.
- Understanding the identified target market for the insurance product(s).
- Understanding who the insurance product(s) is not compatible for and consider the needs characteristics and objectives of vulnerable customers.
- Carrying out distribution activities for the relevant insurance products in accordance with the best interests of their customers; and
- Distributing the product(s) appropriately to the identified intended target market considering their needs characteristics and objectives.

SECTION ONE; Care Home Insurance

Product Features and Characteristics

In this section we set out the product features and highlight any exclusions and conditions relating to the Policy. Detailed information can be found on the NIAUK Website.

This is a summary of the main features, benefits and limitations of the Insurance Policy provided by The New India Assurance Co Ltd for your business. This document provides information only and does not form part of the Policy. Full details of the cover including entire terms conditions and exclusions are set out in the Insurance Policy .

Type of Insurance and Cover: The policy provides cover in a packaged form for **Care Homes**. It is a non-investment insurance contract meaning that the policyholder will not get their money back at the end of the Policy term. Its duration is 12 months unless the Insurance intermediary has arranged a different period with The New India Assurance Company Limited.

Basic Covers

Section	1	Loss or damage to Trade Contents
	2	Business interruption
	3	Breakage of Glass and Sanitaryware
	4	Loss of Money
	5	Personal Assault
	6	Refrigerated Stock
	7	Goods in Transit
	8	Injury to employees
	9	Public Liability covering accidental injury to residents and the public, accidental loss or damage to property and accidental interference with or loss of enjoyment of property as a result of obstruction, trespass or nuisance.
	10	Treatment Risk Plus 24-hour Telephone Legal Helpline

Additional Options

Section	1	Damage to Buildings, Damage to Residents' Effects.
	3	Coverage for Signs Special Glass.
	11	Legal Expenses (arranged by ARAG plc - Insurer is SCOR UK Company Limited).
	12	Loss of Registration Certificate.
	13	Fidelity Insurance.
	15	Breakdown and Damage to Computers

Terrorism

Terrorism is excluded under the policy other than for the Employers Liability Section. Should the policyholder require Terrorism Cover under the Material Damage and Business Interruption Section this can be provided in selected cases at an additional premium, which must be paid to New India within 30 days of cover commencing. Terrorism cover is not available for risks in Northern Ireland

The Cost

The cost of the Basic Covers depends broadly upon following factors:

- The cost of the Basic Cover depends broadly upon following factors:
- The occupation of Premises to be insured.
- Value of insurable Contents, Stock, and whether the policyholder adds any additional optional cover.
- Location of insurable Premises.
- Number of Employees.

Average

Average is a condition requiring that the policyholder will bear a proportion of any loss if their assets were insured for less than their full reinstatement value. This proportion is the amount for which the assets were underinsured, expressed as a percentage of their indemnity value at the time of the loss.

Therefore, if the policyholder does not insure for the full value of their premises, contents, stock, or gross profit and made a claim, any claim payments made under the policy especially section 1 and 2 will be proportionately reduced.

For example, if the policyholder insures their premises for £100,000 and, following a total loss, the reinstatement value is £200,000 we will only pay the policyholder 50% of the costs of reinstatement.

To avoid this situation, the policyholder must ensure that they are covered for the full value of the property that they are insuring taking into account any factors affecting the cost of reinstating the property.

Excess

The Policy excess is the amount that the policyholder has agreed to bear for each claim for loss or damage under the following:

- Section 1 - Building and Contents
 - i) the first £250 of each and every occurrence of loss, destruction or damage unless caused by subsidence, heave or landslip
 - ii) the first £1,000 of each and every occurrence of loss, destruction or damage caused by subsidence, heave or landslip
- Section 3 - Glass - £250 of each and every occurrence of loss.
- Section 4 - Money - £250 of each and every occurrence of loss.
- Section 6 - Refrigerated Stock - £250 of each and every occurrence of loss.
- Section 7 - Goods in Transit - £250 of each and every occurrence of loss.
- Section 11 - Legal Expenses
 - i) the first £5,000 of Legal Costs and Expenses incurred for each and every Compliance & Regulation and Statutory Licence Appeal claim
 - ii) the first £1,000 of Legal Costs and Expenses incurred for each and every Employment and Employment Compensation Awards claim
 - iii) the first £500 of Legal Costs and Expenses incurred for each and every claim for other cover
- Section 15 - Computer - £250 of each and every occurrence of loss.

Significant exclusions or limitations

An exclusion is something that this Policy does not provide cover for. This Policy does NOT cover the following.

- Theft of materials forming part of the building.
- Property in the open.
- Pollution unless sudden and accidental.
- Water table changes.
- Portable heaters.
- Unoccupied premises.
- Loss of money arising from dishonesty of Employee not discovered within 14 days.
- Reinstatement of Sum Insured following a claim.
- Crisis Communication cover under Legal Expenses section is limited to £25,000.
- Legal Expenses subject to Reasonable Prospects of Success.
- Communicable Disease.
- Cyber Loss.

Please see the Policy Document for the full definition of what the policyholder is NOT covered for.

Policy Conditions

Conditions are clauses that, if the policyholder does not follow or comply with, may cause us not to pay out in the event of a claim. It is important that the policyholder understands the conditions that apply to their Policy to ensure that they are properly covered. These terms are defined within the Policy Document.

- Minimum security conditions.
- Cooking conditions.
- Money in transit conditions.
- Reasonable Precautions condition.
- Electrical inspection condition.
- Waste.
- Company Records Condition.
- Felt Roof Condition.
- Cancellation Condition.

For Employer's liability, offshore activities are not included, and terrorism cover is limited to £5,000,000.

For Public and Products liability the following items are excluded:

- claims arising from asbestos
- offshore activities
- electromagnetic fields
- terrorism
- motor vehicle claims
- professional indemnity
- Claims arising from the transmission of Communicable Diseases
- Cyber Loss
- diagnosis (other than by qualified registered nurses), surgery and the prescription and administration of drugs and medicines other than the administration of drugs in accordance with the Care Standards Act 2000, the Regulation of Care (Scotland) Act 2001 or the Health & Personal Social Services (Quality, Improvement and Regulation)(Northern Ireland) Order 2003 as appropriate.

Please see the Policy Document for the definitions of the above exclusions.

SECTION TWO – Target Market

In this section we set out information on the target market.

The target market includes Small to Medium sized Enterprises (SME) / Commercial organisations having interests in Care Homes that require insurance against loss.

The product is specifically designed and suitable to provide specified insurance cover to cover risks associated with registered Care Homes.

The product is not suitable for private retail customers nor for anything other than care homes.

A vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care. We take care to identify vulnerable customers at the point that they seek to take out this cover and we believe that this policy takes into consideration the needs of any such customers.

SECTION THREE – Distribution Strategy

The following distribution chains are suitable for this product.

- Direct
- Via a wholesale broker
- Via a retail broker

The following methods of distribution are appropriate for this product.

- Online
- Face to face

The following types of sales are appropriate for this product.

- Advised

SECTION FOUR – Remuneration

This product is priced based on a gross basis inclusive of commission. We have considered the appropriateness of fees and charges and keep this under regular review as part of our Product and Pricing Committee. Please see Terms of Business Agreement for the full fee structure.

SECTION FIVE - Product Approval Process

As a manufacturer, New India Assurance Co. Ltd designs products with the specific target customer in mind and select distribution channels that are appropriate for the identified target market.

Our senior leadership team takes overall responsibility to ensure that our products and services meet the needs of customers and that they perform as they are expected to.

Our approval process is designed to identify whether the product provides fair value to customers. We monitor products, feedback and complaints data across the product lifecycle in order to assess whether they continue to meet our customers' needs and are delivering fair outcomes and value. We have established governance procedures to maintain and operate a product review process on an annual basis or earlier for any significant product changes and / or adaptations. Our governance process includes regular monitoring and review including taking any remedial action if appropriate. We will test each product including performing scenario analysis when needed.

Before launch, all new products are approved by the Product and Pricing Committee following a rigorous review of the product to ensure that there is no consumer detriment within the design and operation of the product

SECTION SIX – Your Responsibilities

To ensure you have adequate information for the appropriate distribution of the product(s), please read this document in conjunction with proposal, policy, and endorsement documents as collectively they provide more detailed information on the products.

You should ensure that you fully understand the insurance product and contact us if you require any additional information or would like to discuss any training needs.

We remind you of your responsibility to ensure the distribution arrangements that any remuneration is consistent with your regulatory obligations, including SYSC 19F.2 (remuneration) and SYSC 10 (conflicts of interest).

You must advise us of any increases in remuneration.

You must advise us if any product is not delivering value and take any appropriate remedial action.