

Fair Value Assessment (FVA) – Motor Breakdown Solutions

Product Development

The ARAG logo is a yellow circle with the word "ARAG" in black capital letters inside.

Product names	Motor Breakdown Solutions European Motor Breakdown Solutions
References	MBSPW.01-22HDI EMBSPW.01-22HDI
Reviewer	Jack Gelderd
Date Fair Value Assessment was completed	25/08/2022
Date product review signed off by Underwriting and Claims committee	06/09/2022
Product	Existing Product
What type is the proposal	Annual Review of Existing Product

Summary

This product has been subject to the carrier's FVA process and has been reviewed and signed off by our FVA panel as representing fair value to customers. This is in light of a review of the following MI:

- Claims and complaints volumes, including FOS referrals
- Declinature rates
- Any impact on vulnerable customers
- Wording's review
- Any developments likely to impact the product in the next 12 months.

1. Product Design

1.1 Target Demographic

Who is the target demographic and is the proposition aligned to the identified demographic?

- European Motor Breakdown Solutions is designed for car and van drivers who are based in the United Kingdom, Channel Islands, Isle of Man and who are travelling for up to 90 days in the EU, Andorra, Cyprus, Gibraltar, Liechtenstein, Monaco, Norway, San Marino and Switzerland.
- Motor Breakdown Solutions is designed for car and van drivers who are based in the United Kingdom, Channel Islands and Isle of Man.

1.2 Customer Vulnerability

What is the potential for customer vulnerability within the target demographic and how can the product or process be flexed to meet their needs?

- Customer vulnerability is considered pre-inception as a part of product development. No issues have been identified that would change this.

1.3 Market Research

Provide the research that has been completed and explain how it demonstrates the customer need for this product?

- This is an existing product which has been designed around the demands and needs of the target market segment.
- Whether it continues to meet these demands can be evidenced by performance metrics and claims data.

1.4 How is the Product Fair and Reasonable

How have we ensured the product is fair and reasonable? Is the product literature correct/ clear fair and not misleading?

Refer to the Product Oversight and Governance Policy:



Product Oversight and Governance 11.

Literature is fair, clear, and not misleading. ARAG operate a robust sign off process for all new products and material product changes.

1.5 Customer Needs and Demands Expectations

Give consideration to any scenario that could affect customer needs and expectations. How will this be managed and customer need expectations maintained?

- Catastrophe risk is minimal.
- ARAG have a business continuity plan in place in case of any disruptive incidents whereby we can continue our usual operations successfully.
- The pandemic has highlighted the need for legal protection.

1.6 Key Features

What are the key features of the product and why are you comfortable they are appropriate for the proposed customer base?

Please refer to our Point of Sale documents:



European Motor Breakdown
Motor breakdown
EMBSPOS01 POS MBSP0S.01

We are comfortable that the key features reflect the demands and needs of our target market.

1.7 Exclusions

What are the exclusions, are there any deferred periods and how have you deemed them to be appropriate for the customer base?

Please refer to our Point of Sale documents:



Motor breakdown
Sol POS MBSP0S.01



European Motor
Breakdown EMBSPO

We have reviewed the exclusions and we have not identified any cause for concern.

1.8 Commissions and Fees

Are commissions and fees all appropriate and justified?

Commission rates and fees (a) are set by the product distributor, and (b) must be within the limitations set out in ARAG plc's binder with the product distributor.

At product level, average commissions and fees for distributors are at a level considered be fair and reasonable.

ARAG plc will monitor commission rates and fees on an ongoing basis, at both distributor and product level, to ensure products continue to offer Fair Value.

1.9 Core Policy Documents

Have all core policy documents been created, and reviewed and approved by all the relevant parties?

Refer to the Product Oversight and Governance Policy:



Product Oversight
and Governance 11.

All core policy documents have been created and reviewed by Product Development and then approved by all the relevant parties.

2. Sales Process

2.1 Marketing

How will the product be marketed and is there scope for the marketing go outside the target market?

Products are marketed on a business-to-business basis (B2B), marketing material is therefore aimed at the correct customer base for the products. The distribution of our products is down to intermediaries. No issues or concerns have been identified as part of our review.

2.2 Distribution

How is the product sold and is the process appropriate for the target market?

- Sold as an optional or bundled add-on to motor liability insurance.
- Embedded as a section of a primary motor liability insurance product - either as an optional section or mandatory inclusion.
- Distributed through intermediaries (i.e., insurance brokers, MGAs, or insurance companies). Intermediaries must act with the customers best interests in mind, they will work with customers throughout the new business and renewal process to ensure that their needs have been taken into account.

2.3 Process Controls

How is the process controlled?

- Broker training.
- Audits.
- We collate feedback from the Sales and Claims teams and the FOS, and make changes where required.

3. Claims Process

3.1 Fairness

Is the claims process fair and does it present any barriers to claiming?

Having reviewed the data relating to the claims process, in our opinion:

- we consider the process to be fair, and
- there are no obvious barriers to claiming.

4. Complaints

4.1 Fairness

Is the complaints process fair and does it present any barriers to complaining?

Having reviewed the data relating to the complaints process, in our opinion:

- we consider the process to be fair, and
- there are no obvious barriers to lodging a complaint.

5. Additional Notes and Comments

Any notable global and national news from the last 12 months which will have an impact on the products.

- The Brexit Freedoms Bill - Gives ministers new powers to overhaul EU laws copied over after the UK left the EU. Changes need to be monitored as up to 1,400 'messy' EU laws could be torn up, may effect travel abroad and therefore the European Motor breakdown product.
- The Data Reform Bill - This replaces EU rules on data protection laws. This may spell the end of GDPR. Impact on wordings will need to be considered.
- The move to working from home has led to less cars on the road, less motor breakdown claims.
- Growing amount of EV's on the road, recovery methods and wordings to be updated to reflect the changing portfolio of risks.

Have any changes been made to the policy wordings in the last 12 months?

- A cyber affirmative clause has been added.
- A sanctions exclusion has been added.
- Other 'non-urgent' changes from the changelog have been made – such as including a statement on recording phone calls.

6. Actions and Recommendations

Actions to be taken following this review process, R/A/G scale to show immediate, scheduled and/or business as usual.

- • Review products in line with ongoing Brexit developments.
- • Continue to review the non-urgent change log and implement changes if required.
- • Review references to documentation within wordings as a result of change of provider of legal documents.
- • Discuss EV's with third party providers and update wordings to reflect the changing environment of the breakdown industry.