Home Legal Expenses – More Than (Legacy), Brokers & Partners Target Market Statement (TMS)

Review Completed:	Q3 2024
Next Review:	2025

Product Target Market Statement (TMS) (1/3)

Home Legal Expenses (Add on) – More Than (Legacy) / Brokers / Partners

What is this product?

- This is an optional add on cover available under Personal Lines Home Insurance products which is suitable for individual customers looking to cover the cost of legal disputes where they have greater than 51% prospects of success and where it is more probable than not that the outcome of the legal action will be successful.
- This optional add on product relates to the person/people or the property insured by the associated buildings and/or contents policy.

What customer need is met by the product?

Home Legal Expenses is designed to provide:

- Customers faced with a legal issue with cover for legal expenses in a range of situations by paying for a legally qualified representative to act on their behalf. Areas covered may include:
  - Home: Personal injury, consumer protection, residential issues, employment issues, tax and legal defence issues.
- MORE TH>N Home Insurance Only Access to online Legal Documents.
- Some policy wordings Customers faced with costs of Jury Service. *Please use standard contacts for any queries or clarifications.*

Who is the product designed for?

- Home Legal Expenses is designed for customers needing to protect their legal rights relating to their person or the property where they live.

Who is this product not designed to support, or are there any features that you should be aware of when offering this product to your customers?

This product is not suitable for:

- Customers who may need cover for:
  - Proceedings where the a reasonable estimate of the total legal costs is greater than the amount in dispute.
  - Issues relating to motor vehicles unless as a passenger.
  - Disputes with insurance companies about a claim.
  - Customers requiring cover for business related legal actions.
  - Legal issues occurring outside of the Territorial limits defined in the policy.

Can this product be sold with or without advice?

- Home Legal Expenses can be sold with or without advice depending on the preference of individual distributors and in line with FCA regulations.
- This Add On product is only to be sold in combination with other RSA products and not on a stand alone basis. Where sold together as a package, additional sections and documents are to be included within the main policy documentation which should include an appropriate IPID or Policy Summary.

How can this product be sold?

- Sales journeys must identify customer eligibility and ensure that key information and choices to be made are presented to customers in a way that supports a customer through the process of understanding the Home Legal Expenses cover, and excesses (where applicable) to suit their specific demands and needs.
- Home Legal Expenses is designed for sale through different distribution channels suited to meet customer preference.
  - MORE TH>N could be purchased direct through web or telephone and additionally through price comparison websites.
  - Affinity and Retail partners could be purchased through Affinity branch, web, telephone and (by exception) price comparison websites.
  - Broker could be purchased through broker branch, web, telephone and (by exception) price comparison websites.
- Product can be sold mid term via call centre and online (where functionality allows), and at Renewal via call centre and online.

Product Target Market Statement (TMS) (2/3)

Home Legal Expenses (Add on) – More Than (Legacy) / Brokers / Partners

Eligibility, conditions and exclusions that may impact the outcomes that customers may reasonably expect

Customers must:

- Have purchased buildings and / or contents cover in an eligible RSA Home Insurance product.
- Only claim for event types that occurred after the insurance started.
- Only claim for events specifically listed in the policy wording.
- Not claim for disputes between members of the same family.
- Not claim for issues relating to motor vehicles, unless as a passenger.

Please refer to the related policy documentation for all other eligibility, conditions, exclusions and excesses.

Optional additional covers/extensions which are available with this product

- No additional covers/extensions are available with this add on product.

Addons which are available with this product

- No add-ons are available with this add on product.

Product Target Market Statement (TMS) (3/3)

Home Legal Expenses (Add on) – More Than (Legacy) / Brokers / Partners

How is the value of this product assessed?

We assess the value of our products using quantitative (e.g., metrics) and qualitative information (e.g., processes and controls), including data from our distributors relating to service and remuneration, as appropriate.

This product has been approved in line with RSA's product governance processes, including consideration of:

- Value of RSA product: This includes: (i) Cover – whether the level of benefits and relevant exclusions offers value to customers, (ii) Utility – whether the product is being used by the customers of the intended target market, and (iii) RSA service – whether the type and quality of services being provided is reasonable for customers.
- Impact of distribution on value: This includes whether distributor remuneration is appropriate and bears a reasonable relationship to the services provided to our customers. If there are concerns, RSA will follow up with the relevant distributors to agree remedial action.

Based on the assessment performed, we have established that the product is compatible with the objectives, interests and characteristics of customers of the intended target market and that the distribution strategy is not detrimentally impacting overall product value. We have therefore concluded that this product provides fair value to customers.

What are the obligations of our distributors?

- Manufacturer notification – All intermediaries must review their product distribution arrangements at least every 12 months and consider the impact of remuneration against the intended value of product. Distributors must notify the sole/ lead co-manufacturer ASAP if there any value concerns for which remedial action is required.
- Remuneration – Distributors must ensure that any remuneration received for an insurance product would not result in the product ceasing to provide fair value to the customer. Remuneration includes commissions, fees, charges, payments and other economic or non-economic benefits.
- Provision of information – Distributors must provide a product manufacturer (if requested) with: (i) information on the distributors remuneration in connection with distribution of the insurance product; (ii) information on ancillary product or service that may impact the manufacturers intended value of the primary insurance product; and (iii) confirmation that the distribution arrangements are consistent with the obligations of the firm under FCA handbook including SYSC 10 (conflicts of interest) and SYSC 19F.2 (IDD remuneration).
- Price optimisation – If the distributor is a price-setting intermediary, unless there is a reasonable basis, firms should not increase the price of the insurance product based on: (i) policies being subject to auto renewal compared to polices that are not subject to auto renewal; (ii) the customer's vulnerability or any protected characteristics (unless the firm can rely on them under the Equalities Act 2010; and (iii) where customers purchase the policy using retail premium.