



Pension Trustees Liability

Review Type:	Product Approval
Review Completed:	Q3 2025
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Next Review:	2026



Product Target Market Statement (TMS) (1/2)

Pension Trustee Liability Insurance

What is this product?

- Pension Trustees Liability Insurance (PTL) is a Product which protects the personal liabilities of pension fund trustees where actions are taken against them for wrongful acts or omissions in respect of their administration and management of such schemes. The contract is written in the name of the pension fund and/or scheme being insured, with cover extending to all individual trustees, past and present on a “claims made” basis and the sponsoring employer. Some companies will have several pension schemes requiring cover under one contract of insurance.

What customer need is met by the product?

- Any trustee of a pension fund that fails to meet their responsibilities on behalf of a pension scheme, can potentially be held personally liable. This Product is therefore required to protect the personal assets of individuals that take up trustee positions.
- This Product offers financial protection for individuals while acting as trustees, the sponsoring employer and the pension scheme, against civil, criminal and regulatory proceedings.

Who is the product designed for?

- UK Pension schemes, and
- UK domiciled sponsoring employers, including small, medium and large companies.

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?

- Sole traders, Partnerships (other than Limited Liability Partnerships) or Consumers.
- Risks where the sponsoring Employer is domiciled or headquartered outside of the United Kingdom of Great Britain and Northern Ireland, Channel Islands, and Isle of Man.
- Pension schemes outside of the United Kingdom of Great Britain and Northern Ireland, Channel Islands, and Isle of Man.
- Customers that have an existing policy in place providing the same cover and whereby purchasing this Product would give dual cover.

Can this product be sold with or without advice?

- The Pension Trustee Liability Insurance product can be sold with or without advice depending on your preference and in line with FCA regulations.
- The Product is supported by an Insurance Product Information Document (IPID)

How can this product be sold?

- This Product can only be sold via intermediaries.
- The sales journey must identify customer eligibility and establish that the Product and any optional elements are consistent with the customer’s demands and needs. The journey must also ensure that key details are presented to them in a timely manner that allows informed decisions to be made.

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

- The Distributor must always consider whether they have the correct product to meet the Customer’s needs.
- Eligibility and risk acceptance criteria ~~that~~ will restrict access ~~to~~ for certain risks which may be suitable for this Product for but are outside of RSA’s current strategy and risk appetite.
- We include specific exclusions related to fraud, prior circumstances and claims under specific US legislation.

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

Pension Trustees Liability Insurance

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 their products. Distributors must notify the Manufacturer as soon as practically possible if there are 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.
- Provision of information – if so requested, Distributors must provide the Manufacturer with: (i) information on the Distributor's remuneration in connection with distribution of the insurance product; (ii) information on ancillary products or services that may impact the intended value of the Manufacturer's primary insurance product; and (iii) confirmation that the distribution arrangements are consistent with the obligations of the firm under the 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 policies 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 Equality Act 2010); and (iii) where customers purchase the policy using retail premium finance.

1. Remuneration includes: commissions, fees, charges, payments, and other economic or non-economic benefits.