



Unoccupied Home

Target Market Statement

Product Type

This is an insurance product for consumer customers who require cover for loss or damage to their home, whilst the home is unoccupied, contents contained within the home and legal liability for bodily injury or damage to property, arising out of their ownership, possession or use of the home.

Characteristics of the target market (who is this product designed for?)

The product is designed for customers over the age of 18 who own a home which is unoccupied, located in the United Kingdom, Channel Islands or the Isle of Man.

This product can provide cover where there are non-standard elements, such as:

- The property has suffered a subsidence, landslip or heave loss in the last 25 years.
- The property is located in an area identified as having a high risk of flooding and/or has suffered from a previous flood loss in the last 25 years (providing the home is for personal use only and acceptable under the eligibility rules of Flood Re*).
- The property is built of non-standard construction, such as timber or timber framed.
- The property has minor buildings works commencing or planned (such as rewiring, plumbing, replacement kitchen and small extensions).
- Properties with Grade 2 or B listed building status.

*Flood Re – Flood Re is a scheme set up by the UK Government and insurers that provides flood cover as part of a home insurance policy more widely available and affordable where a property is located in an area identified as having a high risk of flooding. More information can be found out about the scheme at www.floodre.co.uk

Customers with characteristics of vulnerability are included within the target market.

Objectives, needs and interests of the target market (considering the key features and benefits of the product)

The product provides cover for loss or damage to the unoccupied home and/or contents caused by events such as fire, explosion, impact, storm, flood, escape of water, theft and subsidence.

Accepted customers will benefit from the following features and benefits where the relevant section of cover has been selected:

- **Buildings:** Covers the cost of repairing, replacing or rebuilding the unoccupied home up to an agreed sum insured.
- **Contents:** Covers the cost of repair or replacing the contents of the home, plus property in the open, including temporary removal of the contents to other premises.



- **Legal Liability:** Covers the legal liability as a private individual and as owner of the unoccupied home for bodily injury or property damage caused to another person or property.
- **Accidents to Domestic Staff:** Liability for bodily injury to domestic staff arising out of and in the course of their employment.

We can tailor bespoke where requested with cover available on a fire, smoke damage, lightning & explosion only basis for both buildings and contents

Who is this product not designed for?

The product is not designed for:

- Commercial customers.
- Unoccupied properties outside of the UK, Channels Islands or the Isle of Man.
- Customers with more than two losses within the last 5 years that would have been covered by this product or a similar home product.
- Customers with more than one unspent conviction and/or pending prosecutions excluding any motor offences.
- Total sum insured values of more than £3,000,000.
- Properties with Grade 1 listed building status.
- Unoccupied properties that cannot be inspected every 30 days.
- Unoccupied properties that have been unoccupied for more than 4 years.
- Unoccupied properties where the intention is for the buildings to be demolished.
- Customers who require escape of water cover but cannot comply with the central heating clause.
- Customers who require cover for contents items such as:
 - o gold, silver, other precious metals.
 - o clothing and luggage.
 - o sports, musical, camping and photographic equipment.
 - o valuables, jewellery and furs.
 - o collection's (paintings, works of art, stamps etc.).
 - o money and credit cards.
 - o pedal cycles.
- Customers who cannot afford the annual or monthly premium

How do we expect this product to be distributed?

This product should be sold with the active assistance and guidance of an insurance intermediary with whom Pen has an agency, to select the appropriate level of cover. The product will only be distributed through brokers who have an agency agreement with Pen, and it will not be distributed directly by Pen to customers.

This product is suitable to be distributed via a variety of intermediated sales channels, such as face to face, telephone, email, or by postal application.

Consideration should be given to the vulnerability of customers by the intermediary who should provide any appropriate support they may need.





What are the distributor value considerations?

We expect all distributors in the chain to consider the following when selling Pen's products:

- The impact on product value of offering other products alongside this one, especially those with proportionally greater remuneration. For example, an ancillary product, elements of which may duplicate existing cover, or premium finance charged at an elevated rate of Annual Percentage Rate (APR).
- Additional commission, fees or charges added as part of distribution processes must be proportionate to the service provided, in line with those charged elsewhere, and not affect the overall value offered by the product.
- Distributors must ensure there is no duplication of cover as a result of any add-on products sold, including premium finance cover, where appropriate cover is already provided by the policy.
- Distributors should consider the Consumer Duty requirements when dealing with policyholders.

Scope

This document is intended to provide an indicative summary of the target market for this product and is not a summary of coverage. Please refer to separate policy documentation for full details of the coverage provided by the product.

Pen has a Product Approval Process

Pen has a product approval process in place to ensure that there is appropriate oversight of all products where Pen is either a co-manufacturer or a distributor. The process includes a risks assessment process where due consideration is given to the impact of the product on the target market and the value of the product.

A diagram of Pens product approval process can be found on the Pen website [here](#).

Important Information

This target market statement should be used by all (co-)manufacturers and distributors of this product. (Co-)manufacturers and distributors should not create their own variation of this document. Where any party using this document has concerns about the accuracy or completeness of the information included, this should be raised to Pen urgently for discussion.



Product Fair Value Outcome – Methodology

Pen has completed Fair Value Assessment work on products we co-manufacture. This is based on groupings of products which may be similar in features and are intended to be distributed to similar target markets.

This Product Fair Value Outcome Statement is not intended to replicate our Fair Value Assessments but sets out the approach taken and the outcome of the assessment.

Distributor Remuneration

Pen agrees commission rates with each distributor and as part of the fair value assessment process has requested details of any additional fees that may be added in the distribution chain. The fee details received have been analysed and if Pen considers these could impact the value of the product this would be raised directly with distributors.

All distributors should be able to:

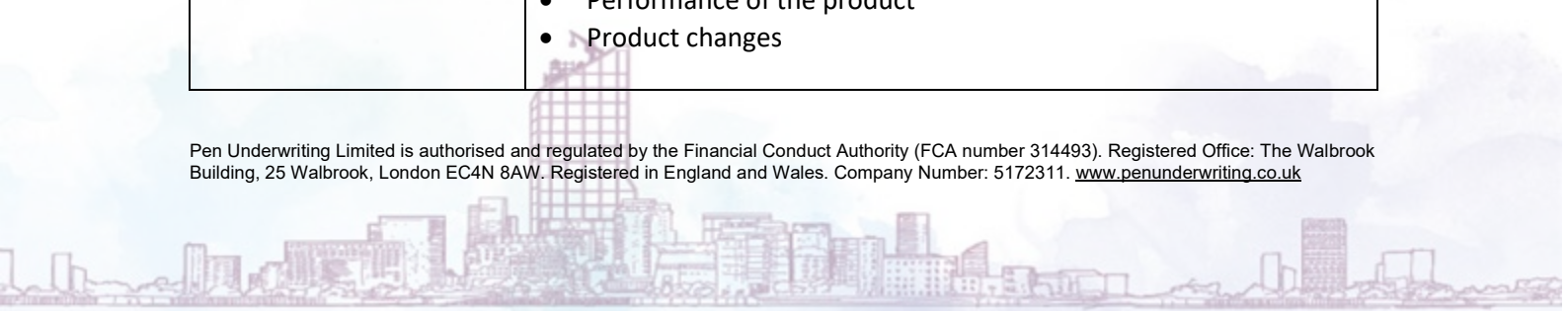
- Confirm annually that the commissions and fees they charge are reasonable relative to the service(s) they provide and the total cost of the product to the customer; and
- Justify that commissions and fees they charge are fair and support the intended value of the product.

How Pen Assesses Value

Pen's product governance and oversight process requires a full review of all product groups at least annually to determine if the product offers fair value to the customer.

These reviews consider the following areas:

Target market	<ul style="list-style-type: none"> • Target market reviewed to ensure the product meets the needs of the customer and will continue to do so for the life of the product • Identify the impact on vulnerable customers where applicable
Distribution strategy	<ul style="list-style-type: none"> • Appropriateness of the distribution channel, services offered and remuneration • Remuneration does not negatively impact the overall value offered by the product
Market assessment	<ul style="list-style-type: none"> • Market scrutiny to ensure the product aligns with current market trends
Product design/lifecycle	<ul style="list-style-type: none"> • Pricing • Regulatory requirements • Fees and charges • Product documentation • Performance of the product • Product changes





Customer journey	<ul style="list-style-type: none">• Quality Assurance• Feedback from distribution
Claims	<ul style="list-style-type: none">• Frequency and trends• Loss ratio trends
Complaints	<ul style="list-style-type: none">• Feedback is reviewed to ensure the product continues to offer good benefit for customers• Reasons for complaints and volumes• Outcomes of complaints: whether they are upheld, not upheld• Identification of trends and root causes• Redress payments: volume and timescales• Financial Ombudsman Service: volume and outcomes
Fair Value Summary	
Pen has considered all relevant factors, including the total price paid by the customer, value MI, distribution and other considerations in this product design.	
Pen is satisfied that the product continues to provide fair value to customers and is suitable to continue to be distributed to the identified target market.	

Valid From	19/12/2025
Next Review Date	On or before 19/12/2026

(Id ref: 7)

