



## Terrorism – Housing Associations

### Target Market Statement

#### **Product Type**

This is an insurance product extending the underlying property damage policies held by Housing Associations to provide specific cover for physical and consequential loss or damage caused by an Act of Terrorism including sabotage.

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

This product is targeted at Housing Associations and similar organisations such as housing co-operatives, housing trusts, housing charities, housing partnerships, arms-length management organisations (ALMOs), friendly societies, industrial and provincial societies, DIY shared ownership, housing private finance initiatives (PFI) and housing joint venture initiatives.

Whilst the policy will be purchased by one of the corporate entities above it will also, where applicable, be for the benefit of individuals who own the leasehold in the properties.

The product is designed for customers located in the United Kingdom, Channel Islands and the Isle of Man only, including both small/medium enterprise customers (non-large risks) and large customers.

There is no minimum or maximum limit to the number of units per policy.

The product is not sold to vulnerable customers, but the beneficiaries of the policy could include leaseholders which may include vulnerable customers. As a consequence, this product should be distributed via an intermediary that can provide any additional support and advice required.

The product is suitable for residential multi-occupancy buildings as defined by the Financial Conduct Authority and where these form part of the risk or portfolio Pen will provide the required disclosure information.

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

This product provides Terrorism cover for portfolios of residential and commercial buildings offering the following benefits:

- Broad definition of terrorism: an act or series of acts by person(s) acting alone or on behalf of or in connection with any organisation, committed for political, religious, ideological or similar purposes including the intention to influence any government and/or to put the public or any section of the public in fear.
- In addition, the definition of Terrorism includes acts of sabotage.



- The Terrorism policy follows the underlying policy's basis of settlement, terms and conditions, definitions, extensions and other provisions.
- The underlying policy does **not** need to be placed with Pen.
- Up to a total sum insured / limit of £50 m with higher limits available on request
- Chemical, Biological, Radiological, Nuclear coverage is provided up to £0.5m as standard although higher limits may be agreed.
- Flexibility to suit customers who can select which property or business they want to insure against Terrorism.
- Brand rehabilitation – following an act of terrorism cover for costs incurred for advertising and public relations.
- Nil excess basis for all policies (unless otherwise requested by the customer).

### **Who is this product not designed for?**

This product would not be suitable for customers located outside of the United Kingdom, Channel Islands or the Isle of Man, that are not Housing Associations or similar organisations as set out above.

The product would also not usually be suitable for customers with the following features:

- Portfolios where there is no underlying or associated property damage policy in place.

### **How do we expect this product to be distributed?**

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

Consideration should be given to the vulnerability of customers by the intermediary who should provide any 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 where appropriate cover is already provided by the policy.



- Distributors must consider the demands and needs of the customer and the Consumer Duty requirements when dealing with customers.

### **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.

### **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 risk 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 Pen's 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"> <li>• 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</li> <li>• Identify the impact on vulnerable customers where applicable</li> </ul>
Distribution strategy	<ul style="list-style-type: none"> <li>• Appropriateness of the distribution channel, services offered and remuneration</li> <li>• Remuneration does not negatively impact the overall value offered by the product</li> </ul>
Market assessment	<ul style="list-style-type: none"> <li>• Market scrutiny to ensure the product aligns with current market trends</li> </ul>
Product design/lifecycle	<ul style="list-style-type: none"> <li>• Pricing</li> <li>• Regulatory requirements</li> <li>• Fees and charges</li> <li>• Product documentation</li> <li>• Performance of the product</li> <li>• Product changes</li> </ul>





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

<b>Valid From</b>	23/09/2025
<b>Next Review Date</b>	On or before 23/09/2026

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