

Product Oversight & Governance (POG) Decision Register

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| Product Name | Annual Construction All Risks |
| Insurer / Product Manufacturer | Great American International Insurance (EU) DAC |
| Co-Manufacturer | N/A |
| Completion date | 27 th February 2025 |
| Date of next review | February 2026 |

| Product Approval Process | |
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| Has the complexity of the product been considered? | <p>Yes - the product complexity has been considered and it is tailored for Commercial customers who are involved in construction projects.</p> <p>This could be the Employer who is having the works undertaken or the Contractor who is carrying out the works.</p> |
| Is there sufficient information on the product for customers and is it readily available? | <p>Yes – the schedule is clearly laid out with all key information and the policy wordings and summary is provided at both quotation and policy issuance stages. A review of wordings and policy quotation has been undertaken to establish compliance with the Consumer Insurance Contracts Act as some policyholders may be consumers by virtue of turnover (less than €3 million)</p> |
| What is the nature of the product and the risk of consumer detriment related to it? | <p>Our cover is designed to help protect both Employers and Contractors against property losses they may face at a construction project.</p> <p>It is a policy that is well-suited for projects ranging from small refurbishment projects to skyscrapers.</p> <p>This is a tried and tested product specifically tailored for construction risks and as such, the risk of consumer harm is low.</p> |
| What are the main characteristics and features of the insurance product? | <p>Construction is a complex business. The risks are numerous and varied.</p> <p>Risk may be due to the human factor (for example, workmanship, design failure or the construction process itself), the environment and the close proximity of different firms' employees on site.</p> <p>Subject to the various conditions and exclusions, our cover is designed to help protect both Employers and Contractors against property losses they may face at a construction project.</p> <p>This product provides insurance cover against physical damage to contract works and contractor's plant and equipment that the Insured either owns, or they have a contractual liability for.</p> <p>If a construction project suffers damage or materials are stolen and they have a responsibility for the loss, GAEU will pay to reinstate the works.</p> <p>If plant and equipment is either stolen or damaged, GAEU will pay to repair or replace the item.</p> |

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| What does the insurance cover? | <p>Our product is intended to cover physical damage to construction works (building and civil engineering), as well as the installation and operation of machinery.</p> <p>Standard cover is provided in respect of physical loss or damage contract works (permanent and temporary) including free issue materials:</p> <ul style="list-style-type: none"> • whilst in transit (other than by sea or air) including any associated loading and unloading • whilst on the contract site until the issue of a certificate of completion or until taken over by the Employer • which is first revealed during the maintenance or defects liability period not exceeding 12 months after completion <p>In addition, optional cover can be provided for:</p> <ul style="list-style-type: none"> • Existing structures: physical loss or damage to existing structures at the contract site • Owned plant: physical loss or damage to contractors' plant owned by you • Hired in plant: your legal liability in respect of physical loss or damage to contractors' plant hired in by you |
| What does the insurance NOT cover? | <p>Our product is provided on an 'All Risks' basis and as such, the main exclusions are standard market exclusions such as:</p> <ul style="list-style-type: none"> • Consequential loss, fines and penalties • Corrosion and general wear and tear • Property insured which is in a defective condition due to a defect in design, plan, specification, materials or workmanship • Inherent defects in existing structures (if insured) • Communicable disease • Cyber loss • Nuclear hazard • War risks • Pollution or contamination • Damage to contract works which is of a prototypical or experimental nature |
| Are there any restrictions on cover? | <p>The main condition under our policy is:</p> <p>Cessation of work: In the event of stoppage of work at the contract site for a period of 90 consecutive days cover under this Section shall be suspended unless agreed by us in writing. In the event of such total or partial cessation of work you shall use due diligence and do all things reasonably practicable to protect the property insured.</p> |
| Where can further information about the policy terms be found? | The Policy Wording and Policy Summary. |

| Product Approval Process | |
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| Who is the target market? | <p>Commercial customers who are involved in construction projects. This could be the Employer who is having the works undertaken or the Contractor who is carrying out the works.</p> <p>Some policyholders may be deemed consumers under the Consumer Protection Code by virtue of turnover threshold (less than €3 million)</p> |
| What are the potential risks posed to the identified target market and how will these be managed? | <p>The potential risks are minimal. Our product was commissioned to be a good quality market wording; including extension which are not readily available in standard wordings such as JCT contract conditions, Marine 50/50 clause & Transit by water.</p> <p>The product has been in the market for a number of years with GAEU and we have received no complaints or requests from Brokers to enhance our cover, with conversion rates supporting this.</p> |
| Who is this product not suitable for? | <p>This is a Commercial Lines general insurance product which is suitable for business customers only.</p> <p>The product is suitable for most Irish based construction projects, however the following risks are considered outside of appetite and therefore may not provide fair value:</p> <ul style="list-style-type: none"> • Wet / Heavy Civils including Tunnelling, major road or pipeline construction • Installation of wind turbines • Underground mining or construction • Waste recycling including scrap metal processing machinery, shredders, balers, fragmentisers and compactors • Agricultural/ forestry machinery • Basement construction under existing structures unless incidental • Contractors that specialise in the restoration / refurbishment of listed buildings • Land Surveyors (unless Surveying Equipment/Total Stations excluded) |
| What reasonable steps will be taken to ensure that the product is distributed to the identified target market? | <p>We only deal with regulated ROI insurance intermediaries that have been approved by the GAEU Commercial Director and Head of Line. Due diligence is completed by Risk and Compliance prior to any TOBA being issued.</p> <p>We exercise appropriate oversight over the operation of the TOBA to ensure that our intermediaries operate within the limits and guidelines agreed with them, including regular audit.</p> |
| Vulnerable Customers | |
| Are there likely to be any Vulnerable Customers to the product? | <p>GAEU believes that the identification and treatment of vulnerable customers is integral to its core values, organisational culture and business objectives. GAEU promotes the fair treatment of all customers.</p> <p>As such we have a specific Vulnerable Customers Process document and as part of our Product Risk Vulnerability section, the likelihood of us encountering a Vulnerable Customer is 'rare'.</p> |
| What are the potential risks posed to Vulnerable Customers and how will these be managed? | <p>Given the high standard of our products and the fact that they are only distributed through regulated professional Insurance brokers (who act on their client's behalf and can explain the content and act accordingly if the client is having difficulty understanding), the risk is low.</p> <p>However, we will maintain awareness of any clients who the Broker indicates may be vulnerable, are in financial distress or if they are/were non-domiciled in Ireland and English could be their second language.</p> |

| Product Testing | |
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| Has the product been appropriately tested, including scenario analyses where relevant, before bringing it to market, significantly adapting it, or if the target market has significantly changed? Also, does the product over its lifetime meets the identified needs, objectives, and characteristics of the target market? | <p>The product has been available in the market for over 50 years and was commissioned for Great American by our Underwriters and Head of Line who have significant over experience in this type of insurance.</p> <p>Great American Insurance has been underwriting Construction Insurance (CAR) for over 5 years.</p> <p>Historically, the industry has demanded from the insurance market a wider form of cover than would normally have been available for a standard non-construction property exposure.</p> <p>CAR insurance can be traced back as early as the 1930's, with policies issued in the marine or goods in transit departments which were accustomed to providing 'all risks' cover rather than the then customary fire and specified perils protection.</p> <p>Our product was commissioned to be a good quality market wording; including extension which are not readily available in standard wordings such as:</p> <ol style="list-style-type: none"> 1. JCT contract conditions 2. Marine 50/50 clause 3. Transit by water <p>Sales data and the monitoring of sales methodologies throughout the lifecycle of this product is managed by GAEU's Head of Construction.</p> <p>For business written by GAEU direct with Brokers, we review monthly performance data including conversion, retention and cancellations.</p> <p>Our complaints procedure is detailed in the product literature with all complaints monitored by GAEU</p> |
| Distribution Strategy | |
| What are the intended distribution channels and are these appropriate for the target market? | <p>Our Annual Construction All Risks product has been designed for distribution by regulated ROI insurance intermediaries or intermediaries authorised to passport into the jurisdiction and only those that have been approved by the GAEU Commercial Director and Head of Line.</p> <p>Due diligence is completed by Risk and Compliance prior to any TOBA being issued.</p> <p>This product should be sold with the active assistance and guidance of an Insurance Intermediary to select the appropriate level of cover. This product should not be sold directly to customers without this assistance.</p> <p>We expect all distributors in the chain to consider the following when selling our products:</p> <ul style="list-style-type: none"> • 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 provide a complete and comprehensive market presentation |
| Is all appropriate information on the product, approval process and the identified target market made available to distributors so they can understand the identified target market and be able to identify any customers for whom the product is not suitable? | <p>Yes – as well as providing a policy summary, we also offer product training to all our Producers. A review is also undertaken of the quotation process of the intermediary partner to ensure that CICA compliance is evidenced for ROI distributions.</p> |

| Pricing and Remuneration | |
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| Is the pricing clear and transparent to end customers and others in the chain? | Yes - the pricing is clear and shown on the initial quotation document and the policy schedule. |
| How will we ensure we continue to operate fair pricing practices for this product? | <p>Our pricing is within the market norm, which is driven by a highly competitive market place with numerous Brokers and Insurers competing for the same business.</p> <p>As mentioned previously, there are significant exposures relating to construction business which this product protects the Insured against, ranging from small frequency losses such as leaking pipes to large severity losses such as fire.</p> <p>The product is deemed to provide good outcomes for the customer as it protects them against a wide range of exposures at a competitive price driven by the highly competitive market.</p> |
| Does the commission splits agreed between Insurers / Underwriters / Brokers bear proportionate resemblance to the work being done for the client? | Commissions have been reviewed and the levels are commensurate with the services provided, and in accordance with our terms of business and the level of commission is in line with market proximate commission levels. |
| Are Insurers / Underwriters / Brokers making additional money through fees, charges, and premium finance arrangements? | A fee may be charged depending on complexity of risk and time spent – the distributor should show this clearly in their documentation. |
| Product Value | |
| Is everyone in the distribution chain providing ultimate value to the end consumer? | <p>Our February 2024 assessment has concluded that our Annual Construction All Risks product, including its charging and distribution structure, is compatible with the needs, objectives and characteristics of the target market and provides fair value.</p> <p>Our product value assessment is based on the premium we charge for the cover and the services we provide. In addition to the identified needs, characteristics (including vulnerabilities) and objectives of the target market we take a wide range of other factors into consideration, such as historical and expected claims frequencies, incurred and projected claims costs, complaints analysis, comparison exercises with competing products, scenario analysis and customer and TOBA holder feedback.</p> <p>The product is subject to ongoing monitoring and formal periodic review by us as the sole manufacturer. Where a significant adaptation to the product is proposed, it is reviewed and, where appropriate, approved prior to the adapted product being marketed or distributed to customers.</p> |
| Does the product in question provide value to end customers both now, for the foreseeable future i.e. policy term, and at potential future renewals? If not, what further actions are required? | Yes and to ensure the customer receives fair value for this product, care must be taken to ensure no duplicate cover exists or is caused by an add-on where that cover is already provided by the policy. Commission, fees, or charges passed onto the customer must be proportionate to the service provided and provide fair value. The distributors should ensure that the sums insured are adequate for the risk insured. |

| Monitoring / Ongoing Review | |
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| How will the product be continuously monitored and regularly reviewed, and who by? | <p>Our monitoring will occur on an ongoing basis and will result in a report to the Board at least annually which will cover Product Governance, Fair Value & Consumer Duty.</p> <p>Sales data and the monitoring of sales methodologies throughout the lifecycle of this product is managed by GAEU's Head of Construction.</p> <p>For business written by GAEU direct with Brokers, we review monthly performance data including conversion, retention and cancellations.</p> <p>For business written via our MGA's they record the same information on a monthly basis and report to us for review quarterly.</p> <p>Claims complaints data, and the monitoring of claims regarding this product is managed by GAEU's Claims Manager.</p> |

| Conflicts of Interest | |
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| Do you foresee any Conflicts of Interest? | There have not been any conflicts of interest identified. |

| Data Monitoring & Collection - Distribution | |
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| PRODUCT PERFORMANCE MEASURES | EXPLANATION |
| Customers total | Total of all policies in force at month end |
| Vulnerable customers total | Total of all vulnerable customers at month end |
| Quotes by policy count | Total number of all quotes given in the month |
| Sales by policy count | Total number of all sales in the month |
| Conversion of quotes to sales % | % Number of sales versus number of quotes given |
| Cancellations within 14 days (cause list required) | The number of policies cancelled within 14 days |
| Mid-term cancellations (cause list required) | The number of policies cancelling mid-term in the month |
| Retention rate % | The % of policies renewed versus invited |
| Distribution complaints (list required) | The number of complaints received in the month in respect to distribution |
| Data Monitoring & Collection - Claims | |
| PRODUCT PERFORMANCE MEASURES | EXPLANATION |
| New claims received | The number of claims made in the month |
| Total outstanding claims (not paid) | The number of claims outstanding at month end |
| Total paid claims | The number of claims paid in the month |
| Average number of days to settle claim | The average time to settle claims |
| Longest outstanding claim (days) | The oldest outstanding claim |
| Number of claims declined (cause list required) | The number of claim declinations along with list of reasons |
| Claims complaints (list required) | The number of complaints received in the month in respect to claims |