



Product Development and Distribution Policy

**nib Travel Services (Australia) Pty Ltd, ABN 81 115 932 173
("nib Travel")**

Dated 1 July 2021

1. Scope

Our Product Development and Distribution Policy applies to all products designed and distributed in the Australian market by nib Travel Services (Australia) Pty Ltd.

2. Policy Statement

nib Travel strives to design and distribute products in line with our product principles. Our product principles guide the decision-making process for new products or changes to existing products and are informed and guided by the nib way and culture of the organisation. The guiding principles include:

- The policy wording (coverage) is designed for the everyday traveller;
- The product provides value for money
- Products are financially sustainable for nib Travel to offer long term;
- Products are developed and maintained where there is sufficient market and will consider the needs of travellers within that market;
- Products will not discriminate against travellers in an unlawful manner.

2.1. Designing products for our target markets

When we design or alter our products, where appropriate we base it on, and take into account, customer research and feedback. This may include commissioned research, publicly available research, internal analysis and feedback from our customer facing teams, amongst other sources.

Design considerations include:

- What type of traveller are we developing this product for? How have we determined our target market?
- What are the product needs of those travellers and how can our product help them?
- What cover should the product include that presents real value to those travellers?
- What is an acceptable underwriting risk profile for nib Travel?
- How and where will those travellers purchase the product?
- What is their pre and post purchase customer experience with us and is it adequate to their needs?
- Is all relevant policy documentation clear and easy to understand?

2.2. Offering products that are easy to understand

In all our products, we talk about our cover and its features using plain language and in an open and honest way. We engage with our partners to provide clear, concise, and effective product information, to support them in explaining it to our customers.

In the development and distribution of our products we aim to:

- remove ambiguity from our wordings; and
- ensure travellers understand what cover the product offers; and
- clearly communicate when cover is not available.

We strive to follow best practice principles including:

- continually work to reduce document length and complexity; and

- improve readability scores; and
- improve document accessibility.

2.3. Distribution controls

We have agreements and guidance in place for our partners and distributors to ensure that our products are distributed to the target market.

Our systems and processes contain controls that ensure products are not sold to people who would not be able to receive a benefit from that product.

We maintain a process for training all staff and distributors on the intended target market for our products and ensure products are not able to be sold if training requirements are not met

2.4. Conditions of distribution

We have clear distribution conditions for our products that all people who are authorised to deal in our products must follow

Products may be offered online, in person, or over the phone by our authorised representatives, distribution partners, affiliates, and authorised agents, and only in accordance with the terms of their active agreement with us.

Distribution must also be in accordance with our risk acceptance guidelines and in line with all relevant legislation, and not contravene our distribution principles.

2.5. Updating our products and process

We continually monitor our products' performance and suitability to its target market. Changes within the existing suite of products, and the process by which they are managed, are treated differently to new products. The type of change required will impact the process we follow.

Changes to a product may include:

- Updating the policy wording and associated regulatory documents
- Increasing or reducing cover within the policy wording
- Introducing or removing cover
- Applying pricing changes
- Changing risk acceptance guidelines
- Incorporating legislative changes

We will adjust our process for changing products to match the complexity of the change, however our underlying methodology for change remains the same for all products.

We also carry out routinely scheduled reviews to ensure products are being distributed to their intended target market.

Other factors that will prompt a review include:

- if the product has not been distributed in line with its target market; or
- significant decreases in product performance or changes in risk to the detriment of consumers; or
- significant increases in complaints and severity of claims; or
- updates to policy wording, our risk appetite or relevant legislation; or
- following significant change in a distributor's business structure or client base; or
- feedback from regulators, distributors or customers which indicates to us that our products or processes are no longer appropriate.

3. Review of the policy

This policy will be reviewed annually to ensure it remains consistent with the General Insurance Code of Practice and all relevant legislative requirements, as well as the changing nature of the organisation.

Policy Owner: nib Traveller Services

Approved By: nib Travel Chief Executive Officer

Last Updated: 1 July 2021