

## Geo Underwriting Services Limited

### Target Market Statement & Fair Value Assessment

Geo Underwriting Services Limited (GUSL) is a Managing General Agent (MGA) and predominantly a manufacturer or lead co-manufacturer of the products it distributes. GUSL acts at all times as agent of the Insurer in accordance with the terms of our delegated underwriting authority agreements.

GUSL has undertaken a Fair Value Assessment (FVA) in accordance with the enhanced product governance requirements introduced by the FCA through their General Insurance Pricing Principles (GIPP) market study PS21/5.

This document is intended to provide a summary of the Fair Value Assessment outcome as well as pertinent information relating to the identified Target Market. It is Intended for use by our distributors, not for customers.

<b>Product</b>	<b>Professional Fee Protection: Client Insured</b>
<b>Class of Business</b>	<b>Fee Protection</b>
<b>Capacity</b>	<b>ARAG plc</b>
<b>Geo's Role</b>	<b>Lead Co-Manufacturer</b>
<b>Date of FVA</b>	<b>Oct-25</b>

#### Fair Value Assessment Output

As per our regulatory responsibilities under PROD 4.2 , this product has been subject to our Product Governance Process and has been approved by our Product Governance Committee as offering Fair Value both now and in the foreseeable future.

In undertaking the Fair Value Assessment, a wide range of factors were considered including, but not limited to, the following;

- The complexity of the insurance product.
- The nature of the product including key benefits and any limitations
- The characteristics of the target market including policy stakeholders and consideration of customers with vulnerable characteristics.
- The type and quality of services provided to customers.
- The distribution channel including any remuneration information and the expected total price to be paid.
- Appropriate data including claims frequencies, claim acceptance rates, average claim pay outs, loss ratio, customer tenure, cancellation rates and complaints data.
- The likelihood of customers not receiving good outcomes / fair value
- any conflicts of interest and where they arise how they are mitigated

### Product Features

Professional Fee Protection Insurance is designed for individuals or businesses submitting tax returns to HMRC, providing cover for professional representation costs incurred during an HMRC tax enquiry or investigation.

The product is available to SMEs and individuals seeking protection against the financial impact of such investigations, offering comprehensive cover up to £100,000 along with access to expert tax advice.

By purchasing this policy, clients gain financial reassurance and support, as it covers their accountant's fees for acting on their behalf in dealings with HMRC.

### The Customer need which is met by this Product

Policyholders will have the financial benefit and comfort when HMRC makes an enquiry, covering for professional representation fees incurred by their Accountants acting on their behalf against HMRC.

Peace of mind for the Policyholder: professional fee protection insurance covers unbudgeted costs, alleviates stress.

### Target Market - Customer whom the Product has been designed for

The target market for Professional Fee Protection Insurance comprises individuals and businesses that submit tax returns to HMRC and face potential exposure to tax enquiries or investigations.

### Customers for whom this product is unsuitable or would not provide the intended value

Customers who may be unsuitable for a Professional Fee Protection Insurance product include those that do not submit a HMRC return.

### Notable Exclusions or Circumstances where the Product will not respond

- Claims which originate from any matter which existed before the first period of insurance unless accepted by us in writing
- Any claim involving the Civil Investigation of Fraud procedure or Specialist Investigation/Fraud Investigations Service unless Code of Practice 8 cover is in place
- Investigations following a voluntary disclosure made to HMRC of taxes due as a result of an incorrect return
- Enquiries into a tax planning arrangement (as specified in the wording)
- Claims where tax returns have not been submitted within 90 days of the statutory filing deadlines unless HMRC accept in writing the reason for the delay
- The costs of making good any deficiencies in books, records, accounts or returns or work ordinarily capable of being done by the policy holder
- Any enquiry or dispute arising from or relating to Tax Credits or CIS Gross Payment Status Disputes
- Taxes, fines and penalties, interest, compensation or damages payable
- The reconciliation of accounts with VAT returns or the reconciliation of CIS returns with P35's
- The cost of obtaining Professional Valuations after a claim has commenced
- Criminal investigations or prosecutions

We recommend that all policy wordings are carefully checked by both the broker and the client to ensure the cover meets the client's requirements and to allow the client to make an informed decision on whether the product is suitable for them.

Copies of our Policy Wordings and Summaries/ IPID's are available upon request. Additionally, we are happy to provide additional training on the product if required

## Distribution Strategy

Our Distribution Strategy, approved by the Executive Committee & Board, is to wholesale products through third party insurance brokers & intermediaries. It is a core part of the MGA strategy to ensure our complex products are sold via regulated intermediaries who provide advised sales. The distribution chain can involve the use of sub delegated authority agreements, panel arrangements, aggregators and any other channels provided these are contractually authorised by capacity and risk assessed as part of our product approval process.

Risk based due diligence is completed on all third parties in line with our Agents and Third-Party agency process. All intermediaries who transact business with us must meet a minimum level of due diligence and financial checks to maintain an ongoing terms of business agreement (TOBA).

Those who distribute products on our behalf must act in accordance with the customers demands and needs to ensure the product is distributed to the intended target market.

All intermediaries who distribute our products are reminded of their regulatory responsibilities to assess fair value to customers where separate fees are charged and/or premium finance is arranged. This also applies where an add-on product (not manufactured by us) is sold alongside the core product.

If a distributor identifies a product is not providing fair value as a result of the distributor's own arrangements, including remuneration, the distributor is obliged to notify Geo immediately. Geo will then assess the circumstances and take action as appropriate.

Commission, fees or charges passed onto the customer must be proportionate to the service provided and provide fair value.

We will from time to time request additional management information from our distributors to support the fair value assessment process. This may include;

- The type and amount of remuneration of each member in the distribution arrangement in relation to the core insurance product including commissions, fees and premium finance charges paid by customers and details of any additional products sold alongside it.
- An explanation of the services provided by each member of the distribution arrangement.
- Confirmation from distributors that remuneration is consistent with their regulatory obligations.

Where information is not provided by a distributor, within a reasonable period of time, Geo Underwriting Services Limited reserves its rights to notify Insurers and/ or the FCA.

#### Product Approval Process

Product oversight and governance controls are in place for the design, approval, distribution, and ongoing management of products throughout their lifecycle.

Our approach to manufacturing, co-manufacturing, and distributing insurance products is underpinned by a set of internal frameworks and controls to ensure we are;

- Providing customers with products and services that deliver fair value and are in their best interests both now, and in the reasonably foreseeable future.
- Adhering to regulatory and legislative requirements
- Delivering commercially viable, competitive, and sustainable products.

We maintain and operate an approval process for all of our insurance products, which is proportionate and appropriate to the nature of the insurance product, its complexities, value and associated conduct risk. Significant alterations to our existing products are also subject to the approval process.

#### Product Feedback

We strongly encourage feedback from distributors on our products, services and distribution methods to help ensure they continue to deliver value now and for the foreseeable future. If you do have any feedback or concerns regarding this product and it's value please contact us via your usual GUSL representative.

Date of Next Assessment

Oct-26