

QBE EO Product Oversight & Governance Information Exchange

The following information has been prepared to meet the FCA’s Product Oversight and Governance rules, as set out in the PROD Sourcebook. These require all insurance product manufacturers to share certain information with Distributors following a Product Review and Fair Value Assessment, to ensure the product is sold to the identified Target Market and therefore meets the needs of that intended target market.

This document is intended to support distributors in understanding the key characteristics, target market, and distribution strategy of the product. It should be used to ensure alignment with the intended customer profile and to identify any potential gaps with the customer requirements.

Please note that we have grouped similar products together where this does not detrimentally affect our ability to review each product appropriately. Similar products are those that are intended to deliver similar cover and outcomes for customers, where the target markets are consistent.

If you have any questions in relation to the content of this product review, please direct these to your relevant underwriting contact at QBE.

CARRIER NAME	QBE UK Ltd QBE Europe SA/NV Lloyd's Syndicate 386/5386 Lloyd's Syndicate 2999/1886
PRODUCT NAME	QBE - Advantage Excess of Loss, Claims Made Excess of Loss, Standalone EL and GL Excess of Loss, Motor TPPD Liability Excess of Loss Broker Partner follow forms - Aon, Marsh, Willis, AJG, Howden, Lockton, Miller, Miles Smith
NAME OF ANY CO-MANUFACTURERS	None
DETAILS OF PRODUCT DEVELOPMENT AND REVIEW PROCESS	<p>Our Product Governance Framework is set out in the QBE EO Insurance Product Development and Review Policy which is approved by the QBE EO Board.</p> <p>The Insurance Product Development Guidelines detail the standards for the development and ongoing management of EO products, including how we consider and approve new products and any significant adaptation or change to the distribution strategy of an existing product. Our process requires the completion of various forms by the proposer of the product development, with oversight of the Product Leader, covering the business case and opportunity assessment through to pre and post launch responsibilities.</p> <p>The Product Oversight Group (POG), co-chaired by the Head of Product Leaders and the Head of Governance, Sustainability and Standards is responsible for providing oversight of and adherence to the Product Governance Framework. The POG oversees, manages and either approves or recommends for approval (to the Divisional CUO and MD) all Product Development and the current and ongoing annual product reviews (where applicable). Either of the POG Co-Chairs will make the final decision whether the proposed product development falls within the scope of the Policy and Guidelines.</p> <p>There is additional oversight from our Compliance team for products which trigger one or</p>

	<p>both of the following:</p> <ul style="list-style-type: none"> - Products assessed as High Product Risk (HPR) – i.e. rated as high risk for conduct risk; and/or - Products intended to be transacted on a direct basis with no intermediary involvement, or via an aggregator site. <p>For these cases, an additional HPR Questionnaire (HPRQ) is completed which is presented to the QBE EO Conduct Risk Group for customer challenge. The HPRQ includes additional consideration of target market, distribution strategy, product testing and post-sales barriers.</p> <p>The proposer of the development must conduct appropriate testing before a product is brought to the market. The Business Case and Opportunity Assessment contains questions which help demonstrate our product testing considerations when developing the product. The purpose of product testing is to assess whether the product will meet the needs, objectives and characteristics of the identified target market. It is important for identifying any potential drawbacks, understanding the future use of the product, testing the communication with and distribution to consumers and putting the customer at the heart of the product design.</p>
PRODUCT INFORMATION	<p>The Casualty Excess of Loss product is intended to provide indemnity in excess of an underlying primary policy for:</p> <p>Employers' Liability – legal liability for bodily injury or disease sustained by employees in the course of employment, including associated defence costs.</p> <p>Public Liability – legal liability for bodily injury to third parties or damage to third-party property arising out of the insured's business activities.</p> <p>Products Liability – legal liability arising from goods or products manufactured, supplied or sold by the insured.</p> <p>Motor TPPD - legal liability for damage to third-party property due to motor accident above motor insurers limit of indemnity</p> <p>The product protects customers against catastrophic liability losses that exceed the limits available under their primary insurance arrangements and supports business continuity and financial resilience.</p>
TARGET MARKET	<p>The product is designed for UK-domiciled commercial entities that:</p> <p>Have an existing primary casualty insurance programme.</p> <p>Require liability limits in excess of those typically available in the primary market.</p> <p>Operate in sectors where potential severity exposure warrants additional protection.</p> <p>The target market has not changed during the review period.</p>
TYPE OF CUSTOMER FOR WHOM THE PRODUCT WOULD BE UNSUITABLE	<p>The product is not suitable for:</p> <p>Consumers or micro-enterprises.</p> <p>Customers without an underlying primary liability policy.</p> <p>Risks requiring bespoke multinational or non-UK liability programmes.</p>
ANY NOTABLE EXCLUSIONS OR CIRCUMSTANCES WHERE THE PRODUCT WILL NOT RESPOND	<p>The Excess of Loss product generally follows the terms, conditions and exclusions of the underlying primary policy on a follow-form basis, subject to any specific exclusions or limitations set out in the XoL wording. Key considerations include:</p> <p>The requirement for a suitable and rated underlying primary insurer.</p> <p>Clear specification of attachment points and limits.</p> <p>Any exclusions specific to the excess layer, which are highlighted to brokers at placement.</p>

OTHER INFORMATION WHICH MAY BE RELEVANT TO DISTRIBUTORS	Distributors are provided with policy documentation, including wording and summaries, and are expected to ensure alignment between the Excess of Loss policy and the underlying primary insurance. Brokers play a critical role in advising on structure, attachment points and suitability.
DATE FAIR VALUE ASSESSMENT COMPLETED	May 2026
EXPECTED DATE OF NEXT REVIEW	May 2029

Fair Value Assessment

RAG	Requirement	Rationale
	Target Market - the product is fit for purpose and remains consistent with the needs, characteristics and objectives of the identified target market	<p>The Casualty Excess of Loss ("XoL") product is designed to provide additional limits of indemnity above an underlying primary Employers' Liability and/or Public & Products Liability policy. It is intended for UK commercial insureds whose risk profile, contractual requirements, or severity exposure necessitate liability limits in excess of those typically available in the primary insurance market.</p> <p>The product is most suitable for SME and mid-market commercial entities operating across a wide range of industry sectors, where the insured has an established primary liability programme and requires excess capacity to protect against low-frequency, high-severity loss scenarios. The XoL product complements the Primary Casualty product and is not designed to operate as a standalone substitute for primary cover.</p>
	Fair Value - the product provides fair value for customers, when considering the relationship between the overall price and the quality of the product(s) and/or services provided	<p>The Casualty XoL product continues to provide fair value when considering the relationship between the overall price paid by the customer and the quality and quantity (limit of indemnity) of the protection provided. Value is derived primarily from access to additional limit capacity, protection of the insured's balance sheet against catastrophic loss, and the ability to meet contractual or stakeholder liability requirements.</p> <p>Pricing reflects the severity-driven nature of the product, with limited attritional claims activity, and is assessed in the context of the underlying primary policy, broker market comparison and prevailing market conditions. There have been no material changes to product design or pricing approach during the review period that would adversely affect value.</p>

<p>Distribution strategy - the distribution strategy remains appropriate and distribution arrangements do not have any detrimental impact on value for customers</p>	<p>The product continues to be distributed via regulated UK intermediaries, including retail and wholesale brokers, which remains appropriate given the technical nature of Excess of Loss insurance. Broker involvement is critical to ensure correct placement, appropriate attachment points, alignment with the underlying primary policy wording, and avoidance of coverage gaps.</p> <p>No changes to the distribution strategy have been made during the review period, and the current approach does not detrimentally impact customer value.</p>
<p>Customer Understanding - the information provided to the customer enables them to make informed decisions</p>	<p>Customers receive the product on an intermediated basis, with brokers providing advice on suitability, structure and comparison with alternative market offerings. Product documentation, including policy wording and summaries, clearly describes the scope of cover, attachment points, limits, exclusions and claims procedures. This enables customers to make informed decisions about purchasing the product as part of their overall liability insurance programme.</p>
<p>Customer Support - support provided to the customer allows them to fully utilise the product they purchase, e.g. make a claim, complain, cancel or amend cover</p>	<p>Customers are supported through established claims, complaints, cancellation and amendment processes. As a follow-form Excess of Loss product, claims are generally managed in conjunction with the underlying primary insurer and broker, ensuring consistency and clarity throughout the claims lifecycle. No barriers to customers accessing support have been identified.</p>