

# Product, Design & Distribution Policy

August 2024





## Product, Design and Distribution Policy

This policy sets out Steadfast Underwriting Agencies' (SUA) approach to developing and distributing retail insurance products for their agencies that deal in a retail product for their Target Market Determination (TMD).

A TMD is a publicly available document that assists consumers obtain financial products that are consistent with their likely objectives, financial situation and needs of the consumers for whom they are intended.

### Our Commitment

Agencies must take reasonable steps that result in financial products reaching consumers in the target market defined by the agency. Agencies are required to monitor outcomes and review products to ensure that consumers receive products that are consistent with their likely objectives, financial situation and needs.

### Product Design

SUA work closely with insurers to develop and maintain effective product governance arrangements across the life cycle of the financial products to ensure that consumers receive products to be consistent with their likely objectives, financial situation and needs.

SUA and its insurers specify distribution conditions and restrictions that make it likely that consumers who acquire the product are in the target market. This includes a plan implemented before distribution of the product, to determine how the product and distribution will be monitored and reviewed which includes the circumstances in which a review is required.

### Governance

SUA and its insurers implement and maintain robust and effective product governance arrangements to ensure compliance with the design and distribution obligations. The design and distribution obligations impose requirements at each stage of the distribution of a financial product. These stages include product design, product distribution and monitoring and review.

TMDs include review triggers specifying events and circumstances that reasonably suggest that the TMD may no longer be appropriate and may suggest the TMD be reviewed or reviewed more frequently. These triggers may include significant dealings having occurred which may include consumers acquiring a product who are not in the target market or who were specifically excluded from the target market.

Insurers are required to notify ASIC of significant dealings that are not consistent with their TMD as soon as practicable or within 10 business days of becoming aware of the significant dealings.