



## TARGET MARKET DETERMINATION - EXPATRIATE INSURANCE

|                                      |                                                                                                    |
|--------------------------------------|----------------------------------------------------------------------------------------------------|
| Product                              | Expatriate Insurance                                                                               |
| Issuer                               | DUAL Australia Pty Limited (AFSL: 280193) on behalf of certain Underwriters at Lloyd's of London   |
| Distributor                          | Licensed insurance Brokers (and their authorised representatives) holding an AFSL approved by DUAL |
| Publication Date                     | 25 September 2021                                                                                  |
| Review Date                          | Every two years                                                                                    |
| Distributor's Reporting Requirements | Quarterly unless a complaint concerns a "significant dealing" then immediately                     |

### What is a Target Market Determination?

A Target Market Determination (**TMD**) is prepared by the issuer of the product and aims to provide customers and distributors with sufficient information to understand who the product is suitable for. It also details the distribution conditions for this product, how often the TMD will need to be reviewed, along with the distributor's reporting and record keeping requirements.

### Background

DUAL Australia Pty Limited (**DUAL**) underwrites insurance on behalf of certain Underwriters at Lloyd's of London. In performing this function, DUAL issues an Expatriate Insurance Policy (the **product**) to consumers. In general, the product provides benefits to insured persons for medical expenses whilst they are domiciled overseas as expatriates, provided those consumers meet the underwriting guidelines and claims eligibility criteria.

When issuing this product, DUAL acts as agents for the Underwriters and is authorised to provide general financial product advice and factual information about the product. Individual customers will need to consider whether this insurance product meets their specific objectives, financial situation and needs. This product is only distributed to customers who have appointed a licensed insurance Broker (or their authorised representatives) to act on their behalf as their agent.

# Target Market Determination

## 1. Class of consumers comprising the target market for the product

### The product is suitable for ('target market')

The product is suitable for consumers under the age of 66 who are domiciled overseas as an expatriate and wish to purchase insurance cover for their medical expenses.

The product is not complex and is appropriate for retail consumers who work in occupations and industries that are acceptable to cover under DUAL's underwriting guidelines.

### The product is not suitable for ('negative target market')

The product will likely be inappropriate for consumers who fall outside the product's underwriting criteria (due to the type of work they do or the location of secondment) or claims criteria (that is, they are ineligible to make a claim or a policy exclusion applies). This will include consumers who, for example:

- a. are outside the age range given above;
- b. are nationals residing in their own country where they are a resident;
- c. wish to insure against the costs associated with elective treatments such as cosmetic or plastic surgery;
- d. wish to insure against the costs associated with routine medical or physical examinations such as routine health checks;
- e. wish to insure against congenital conditions;
- f. participate, train, or otherwise take part in professional sports of any kind; or
- g. suffer from a sexually transmitted disease or infection, including but not limited to Acquired Immune Deficiency Syndrome (AIDS) disease or Human Immunodeficiency Virus (HIV) infection.

## 2. Conditions or restrictions on distribution

To avoid the product being mis-sold to customers, this product cannot be purchased from DUAL by customers directly. A network of Brokers (the **Brokers**) distributes the product to consumers. Brokers are required to provide DUAL with a proposal form on behalf of the customer for submission. The Broker will then be referred to a DUAL Accident and Health Underwriter who specialises in this area and has the appropriate training for this product.

As part of the proposal process, Brokers are required to submit information confirming that the customer is domiciled overseas as an expatriate and provide data in relation to the customer's occupation, country of posting, age and medical status (etc.). DUAL will also require information regarding other insured persons, such as the expatriate's spouse and/or children. As a result of these measures, DUAL expects consumers who are unlikely to receive sufficient benefits from this product will be identified before an inappropriate sale is made.

It is a condition of the quotation, that both the Broker and the customer review the Policy Wording of the product and associated endorsements and are satisfied with not just the benefits of coverage but also the limitations and restrictions on coverage prior to finalising the sale to the consumer (i.e. binding the risk).

## 3. Review triggers

DUAL will take into account the following factors in deciding whether a review trigger (a circumstance that reasonably suggests that this determination is no longer appropriate) has arisen and is therefore obligated to report a "significant dealing" to ASIC (under s994G *Corporations Act 2001* (Cth)):

- a. whether the product has been sold to a large proportion of consumers outside the target market;
- b. whether the nature of the dealing(s) means that consumers have actually suffered, or are likely to suffer, significant harm; and
- c. whether the dealing(s) are inconsistent with a material provision of this determination, or there is a pattern of less serious, but numerous, inconsistent dealings.

If a review trigger arises, DUAL will review the product and this determination within 10 business days of the date this trigger was known or ought to have reasonably been known by DUAL, taking into account the information set out in section 4 below.

#### **4. Information required to decide when this determination may no longer be appropriate**

When reviewing the product and this TMD, DUAL will have regard to all relevant matters, including the following data:

- a. complaints about the product or claims made to the Brokers, DUAL, Lloyd's and the Australian Financial Complaints Authority, including the number, receiving party and nature of those complaints;
- b. a material change to the product, claims or underwriting criteria, that impacts the suitability of the product for the target market;
- c. a material change to the way the product is distributed;
- d. a material defect is found in the product PDS; and
- e. DUAL's financial product metrics, including product claim ratios; number of policies sold; the rate at which policies are cancelled or are not renewed and the average time taken to finalise claims.

It may also be necessary to evaluate this data with reference to particular distribution channels and product features, in case a potential problem is confined to a particular feature of the product or its distribution rather than the product generally.

DUAL will require the Brokers to provide quarterly reports on this data (to the extent DUAL does not already possess them). DUAL also expects that the Brokers will immediately notify it should it become aware of a "significant dealing" outside the product's target market.

#### **5. Review periods**

Assuming no review triggers arise, DUAL will first review the TMD two years after the original TMD publication date. DUAL will then review the TMD every two years, following the first review.

#### **6. When distributors should provide information about the number of complaints about the product**

DUAL expects that its network of Brokers will provide quarterly reports about complaints, detailing the volume and types of complaints received. In addition to these periodical reporting requirements, the Brokers will be required to immediately report any complaints which may concern a "significant dealing" outside the product's target market.

## **Contact Details**

Should you wish to discuss this TMD, please contact us via the following:

For enquiries: [compliance@dualasiapacific.com](mailto:compliance@dualasiapacific.com)

For complaints: [complaints@dualaustralia.com.au](mailto:complaints@dualaustralia.com.au)

DUAL Australia Pty Limited

Level 6, 160 Sussex Street,

Sydney NSW 2000

Telephone: 1300 769 772 (within Australia) or +61 2 9248 6300 (from overseas)

This TMD is available to the public on DUAL's website via the following [link](#).