



The specialist
motor insurer

ERS

Enthusiast

Product Review 2026

part of the **IQUW**
GROUP

Contents

Key contributors.....	3
Review details.....	3
Previous Review and Attestation.....	3
Executive Summary.....	4
Review status.....	4
Recommendations.....	4
1. Risk Appetite.....	5
2. Customer Demographic.....	7
3. Product volumes.....	9
4. Claims.....	12
5. Indemnity.....	15
6. Cancellations.....	16
7. Commission.....	17
8. Broker Conduct.....	18
9. Service.....	18
10. Additional Products.....	19
11. Pricing.....	20
12. Complaints.....	23
13. Vulnerable Customers.....	24
14. Financial Crime.....	26
15. Policy wording.....	27
16. Competitor analysis.....	29
17. Distribution.....	31
18. Fair Value Assessment.....	33
Appendix 1: RAG Definitions.....	34
Appendix 2: Classic Car and Enthusiast wording comparisons.....	35
Appendix 3: Affinities Vulnerable Customer - Case Studies.....	41

Key contributors

Name	Role
Alan Bradbury Kerrie Jones Mark Suffield	Senior Underwriter – Delegated PL Underwriter – Personal Lines Senior Trading Underwriter - Portfolio
Tom Milton	Pricing Manager
Justin Rees	Senior Conduct Manager
Dai Llewellyn	Customer Relations Manager

Review details

Reviewer	Rhys Jones
Class of business	Enthusiast
Products in scope	Classic Car (SWH), Enthusiast, PL DA Enthusiast, Rallies.
Period reviewed	01/01/2025 – 31/12/2025
Date of review	March 2026
Location of data	W:\Underwriting\Underwriting Governance\Product\Product Reviews\2026\Q1 Reviews\5. Enthusiast - RJ

Previous Review and Attestation

Date of last Full review	March 2025
Grading of last Full Review	Green
Date of most recent Underwriter Attestation	January 2026
Outcome of Attestation	No concerns
Projected date of next review	Q1 2026

Executive Summary

Customer Demographic		No concerns
Product Volumes		No concerns
Claims Walkaways		No concerns
Indemnity		No concerns
Cancellations		No concerns
Commission		No concerns
Broker Conduct		No concerns
Service		No concerns
Pricing		No concerns
Complaints		No concerns
Vulnerable Customers		No concerns
Financial Crime		No concerns
Policy Wording		No concerns
Competitor Analysis		No concerns





Review status

Overall Product Status	Full Assurance	The product, processes and controls in place mitigate the key risks arising in the area under review to a material degree. As such, product complexity and advice, service risks, sales and distribution risk and customer impact are minimal.
------------------------	----------------	--

Recommendations

No	Recommendation	Agreed Y/N	Justification
1.	N/A	N/A	N/A

1. Risk Appetite

Risk	Classic Car (SWH)	Enthusiast	PL DA Enthusiast	Rallies
<p>Driver</p> 	<ul style="list-style-type: none"> Drivers aged 28 to 80 Claim free risks through to those with multiple claims or single large losses All drivers experience and history considered 	<ul style="list-style-type: none"> Drivers aged 17 to 85 Claim free risks through to those with multiple claims or single large losses All drivers experience and history considered 	<ul style="list-style-type: none"> Drivers aged 17 to 85 Claim free risks through to those with multiple claims or single large losses All drivers experience and history considered 	<ul style="list-style-type: none"> Drivers aged 25 to 70 – Acceptable 71-75 (no fault claims of any type in previous 3 years) – Acceptable (Tysers 71-80) Any outside of these criteria, referral to underwriters
<p>Vehicle</p> 	<ul style="list-style-type: none"> Collectible cars (at least 20 years old unless highly collectable) Not the sole vehicle or used daily 	<ul style="list-style-type: none"> 'Enthusiast' Cars/Vans Classic cars Electric vehicle conversions Modified cars (multiple cosmetic or performance enhancing) Imported enthusiast vehicles considered Single vehicles or collections 	<ul style="list-style-type: none"> Modified or kit cars Electric vehicle conversions All other risks can be considered on referral 	<ul style="list-style-type: none"> No real restrictions on vehicle type. Vehicles do need to be "prepared" for any event they are taking part in.
<p>Value</p> 	<ul style="list-style-type: none"> Vehicles with a value of £2,000 - £60,000 Certain specialist brokers can write vehicle values of £1,500 - £100,000 	<ul style="list-style-type: none"> Vehicles with a value over £2,000 and with no upper value limit Some delegated brokers may write vehicles valued £1,500 and above 	<ul style="list-style-type: none"> Vehicles with a value over £2,000 and with no upper value limit 	<ul style="list-style-type: none"> Gumball: <£1,000,000 Tysers: £2,000 - £1,000,000
<p>Use</p> 	<ul style="list-style-type: none"> Comprehensive cover only Vehicle/owner based in the UK Stored in private garage/locked building, driveway, carport, or professional storage All postcodes considered (subject to storage) All cover types considered SD&P, commuting, business use & occasional wedding hire use 	<ul style="list-style-type: none"> Vehicle/owner based in the UK Wide range of storage options considered All postcodes considered (subject to storage) All cover types considered SD&P, commuting, business use & occasional wedding hire use 	<ul style="list-style-type: none"> Vehicle/owner based in the UK Wide range of storage options considered All postcodes considered (subject to storage) All cover types considered SD&P, commuting, business use & occasional wedding hire use 	<ul style="list-style-type: none"> Use tailored to the specific needs of the event. Rallies or historic events and motoring adventures

Target Market

The Enthusiast products (Classic Car (SWH), Enthusiast, PL DA Enthusiast) is designed to meet the needs of customers with an enthusiasm for specialist vehicles. The type of vehicle and uses have a wide scope to meet the demands and ranges from classic cars to modified/kit cars with varied uses including SD&P, commuting and business.

This review also encompasses the Rallies scheme which is designed to meet the needs of customers taking part in classic/historic road tours, rallies, and motoring adventures. Policies run for the duration of an event, which are corporate in nature.

Driver ages and experience are generally wide scoping to cover all the market, this is clearly stated within Underwriter guides utilised by brokers and on the website.

2. Customer Demographic

Classic Car (SWH)		
Appetite	% Policies outside limits	Acceptable
Drivers aged 28 - 80	0.7%	Yes
Vehicle value £2,000 - £60,000 (Certain brokers can write £1,500 - £100,000)	0%	Yes
Private garage/locked building, Driveway, Carport or professional storage, Driveway and Carport	0%	Yes
Use - SD&P, commuting, business, and wedding hire	0%	Yes

Enthusiast		
Appetite	% Policies outside limits	Acceptable
Drivers aged 17 - 85	2.9%	Yes
Vehicle value > £2,000	0.2%	Yes
Use - SD&P, commuting, business, and wedding hire	0%	Yes

PL DA Enthusiast		
Appetite	% Policies outside limits	Acceptable
Drivers aged 17 - 85	1%	Yes
Vehicle value > £2,000	1%	Yes
Use - SD&P, commuting, business, and wedding hire	0%	Yes

Demographic data for the Enthusiast product shows no real concerns. Whilst a number of policies were found to be outside of the limits prescribed by the risk appetite, the overall volume of cases was very low.

There were a small number of policies where the drivers age sat outside of appetite. All policies where the driver was showing as younger than 17 were found to be the results of data errors and then true age of the driver was actually within the acceptable appetite. Drivers that were older than the upper limit were found to be renewals who had originally incepted business with us when they were within the required age profile, continuing to renew these risks is described as common practice by the underwriters as long as driver age is the only factor beyond our appetite.

There were also some policies on which the vehicles were valued under the £2,000 limit. After conversations with underwriters, they advised that some brokers have delegated authority rights to write vehicles from £1,500 which accounts for the majority of the outliers. There are also some vehicles which have been on cover for a number of years and the vehicle value has depreciated below the new business appetite. Underwriters have advised that the brokers are all very mindful of low-value risks, and the impact they can have on loss-ratio, so we are comfortable with allowing them to use their judgement in cases where value is the only factor out of appetite. There are also a number of occasions where these are referred to Underwriting too.

Analysis of the complaint data did not identify any demographic related complaints and there is nothing in the demographic data that causes significant concern.

Overall, the risk appetite is clear and well defined, with a process in place to accept additional risks upon referral to expert underwriters, so there is nothing in the demographic data that suggests the appetite is not being appropriately adhered to.



3. Product volumes

	All ERS Products			
	2023	2024	2025	2025 Plan
Written policy count	374k	383k	360k	362k
Gross written premium	£362m	£422.1m	£504.8m	£542.3m
Average Gross Premium	£968	£1,101	£1,401	£1,498
Loss Ratio	30%	30%	24%	N/A
Claims frequency	3%	4%	3%	N/A
Average claim cost	£4,879	£5,960	£5,127	N/A

	Classic Car (SWH)			
	2023	2024	2025	2025 Plan
Written policy count	3,422	1,715	1,829	1,835
Gross written premium	£1.9m	£199k	£202k	£201k
Average Gross Premium	£548	£116	£110	£109
Loss Ratio	12%	24%	4%	N/A
Claims frequency	1%	0.41%	0.22%	N/A
Average claim cost	£4,911	£6,740	£2,178	N/A

Classic Car (SWH) performed well in 2025, improving on the performance years and very slightly exceeding the forecasted plan for 2025.

The claims performance was also very positive with a significant drop in loss ratio from previous years being driven by a combination of a light drop in frequency and a significant drop in average claim cost. While these metrics are not something we can directly control, it does inspire confidence in our risk selection.

	Enthusiast			
	2023	2024	2025	2025 Plan
Written policy count	3,422	5658	5319	N/A
Gross written premium	£1.9m	£3.85m	£3.66m	N/A
Average Gross Premium	£548	£681	£688	N/A
Loss Ratio	12%	26%	22%	N/A
Claims frequency	1%	5.84%	1%	N/A
Average claim cost	£4,911	£4,604	£9,058	N/A

The performance of the Enthusiast schemes in 2025 was largely consistent with that of 2024 in terms of written policies and premium, Mark Suffield advised that they are happy with the performance in this area as it is not a book that the team are currently focused on expanding. Claim frequency was significantly lower in 2025 compared with 2024 but the average claim cost was almost double, largely due to a number of high value claims (7 claims valued over £30,000 including one at £81,000). As a result, the Loss Ratio has remained very similar to 2024.

	PL DA Enthusiast			
	2023	2024	2025	2025 Plan
Written policy count	27,908	25,113	22,377	N/A
Gross written premium	£8.5m	£10.2m	£8.9m	N/A
Average Gross Premium	£283	£405	£397	N/A
Loss Ratio	24%	34%	33%	N/A
Claims frequency	2%	3.62%	2.14%	N/A
Average claim cost	£4,722	£3,655	£5,805	N/A

The 2025 PL DA Enthusiast book saw a drop in policy volume and written premium compared with 2024. Senior Underwriter Alan Bradbury advised that the consensus is that the 2025 PLDA class has performed well and is likely to 'end' below the target loss ratio of 55.6%. This target this is where the loss ratio has earned through (i.e. the figure of 33% is likely to increase each month as claims are adjusted/settled). For comparison, the 2025 YTD Net loss ratio is currently 39.9% YTD (a 6.8-point increase since the end of 2025). This will continue to fluctuate as will prior years.

Alan also advised that, in terms of premium, the specialist classes saw the market soften in 2025, particularly in H2 – additionally, other insurers such as KGM, Axa and Markerstudy were highly ‘active’ in securing business and jointly, these factors contributed towards a challenging premium target. As a result, the 2025 SBF target was missed, although this was determined mid-way through 2025 just before the market changed.

	Rallies			
	2023	2024	2025	2025 Plan
Written policy count	4	5	6	N/A
Gross written premium	£213k	£627k	£501k	N/A
Average Gross Premium	£53,131	£125,428	£83,460	N/A
Loss Ratio	0%	95%	24%	N/A
Claims frequency	0%	140.00%	83.33%	N/A
Average claim cost	£0	£85,185	£23,625	N/A

The rallies book is very small in terms of policy volume so there is little to observe from the above figures. There has been a drop in premium but the nature of the risks being written each year varies significantly depending on the size and location of each event being covered.

2025 saw significantly better claims performance than 2024 but there were still significant losses. The performances of 2023 and 2024 perfectly illustrate the nature of the rallies book as there is the potential for no claims at all, or several very high value claims in one year. 2025 sits somewhere in the middle of those two extremes.

Overall, no concerns have been raised with the product volumes, which suggests the product is still meeting the needs of the target market and continues to offer fair value.

RAG Status

4. Claims

FCA measures	Classic Car (SWH)	Enthusiast	PL DA Enthusiast	Rallies
Total claims registered	5	94	595	6
Number of policies in force	1829	5319	22377	6
Claims frequency	0.2%	1.0%	2.1%	83.3%
Claims accepted	5	94	595	6
Claims rejected	0	0	0	0
Acceptance rate	100.0%	100.0%	100.0%	100.0%
Total claims payout	£18,893.00	£794,302.00	£3,214,567.00	£116,775.00
Average claims payout	£3,778.60	£8,450.02	£5,402.63	£19,462.50
98th percentile claims payout	£9,742.52	£63,036.50	£33,245.50	£86,212.48
Claims walkaways	0	2	59	2
Claims walkaway %	0.0%	2.1%	9.9%	33.3%
Claims complaints	0	4	31	0
Claims complaints as a % of claims	0.0%	4.3%	5.2%	0.0%

The claims data is specific to the 2025 underwriting year of account and correct at the time of writing.

Classic car (SWH), Enthusiast, and PL DA Enthusiast all had low claim frequencies (below 2.1%). Rallies had a comparatively large claims frequency at 83.3% but, due to the low policy volume and vehicle exposure, a small number of claims will still generate an inflated frequency figure. In the case of Rallies in 2025 there were only 6 claims in total, so the high frequency figure raises no product concerns.

There were no claims rejected across the product in 2025. The claims acceptance rate of 100% gives assurance that the product is meeting the demands and needs of customers and there are no post sales barriers.

The average claims payouts across the product are comparable to 2024 with the exception of Rallies which saw a significant drop. This is due to 2024 containing multiple high value claims, the nature of the product means that claims are often high value but not many occur so annual claim payout figures can vary hugely year on year without presenting a concern. The value of the top 2% of claim pay outs for each area shows there is benefit to customers in the coverage provided, settling larger claims where needed indicating fair value is being offered.

Claims walkaways are comparable to 2024 seeing very slight drops across all areas. Once again, Rallies appear to have high rate only due to the low volume of claims mentioned previously. Closer analysis of the claims identified the main reasons for walkaways were:

1. Non-fault claims – the insured’s claim is reported to ERS within the policy terms and conditions, but the customer pursues the claim via the third-party insurer.
2. Small amount of damage sustained – customers decide not to pursue the claim as the damage is minor and falls within the policy excess.

There is clear evidence customers are not pursuing claims for legitimate reasons, and the walkway rate is consistent with other retail related products.

Claims complaints have improved year on year; this will be discussed in more detail in the complaint section of the product review. The rate of claims complaints is consistent with other retail products.

The FCA claim measures have been considered and no concerns have been raised for this product, there is evidence customers can pursue their financial objectives and receive the full benefit of the product supporting the position fair value is being offered.

Claim service indicators		
Measure	Target	Outcome
FNOL (average speed of answer)	<90 seconds	90
IMU (average speed of answer)	<180 seconds	133
TL (average speed of answer)	<180 seconds	122
% of correspondence outside SLA	<5%	5%
Diaries outside of SLA	<5%	4.2%
TL (average days to settle)	<14 Days	15
Engineers (estimate approval)	<3 Days	2.1
Engineers (lifecycle to authority)	<30 Days	23.8
Reserving accuracy (FLOD)	95%	95%
Complaint identification (FLOD)	>97%	99.9%
Vulnerable customer identification (FLOD)	>97%	99.9%
Summary Resolution Communication (Lloyd’s)	< 7 Days	100%
Stage 1 response (Lloyd’s)	<14 Days	99%

Claims service levels are recorded at syndicate rather than product level due to the efficiencies created from an aligned claims function with specific departments (e.g. FNOL, Total Loss).

The main customer functions have performed well in 2025, telephony targets have been met, and the percentage of post and diaries is within threshold raising no concerns.

Total loss average days to settle is marginally outside of the 14 days threshold, closer analysis shows the main reasons were customers electing to delay settlement rather than any systemic delays.

FLOD audits are completed monthly for ongoing assessment of performance and trends across all claim’s functions, there has been good adherence in reserving accuracy, complaint and vulnerable customer identification.

Complaints are being identified and settled promptly and there is no disproportionate treatment to vulnerable customers giving assurance all products are benefitting from good customer outcomes.

Overall, there is compelling evidence that the claim's function has performed well across all products in 2025 against several customer service measures, there are no unreasonable barriers to making or progressing a claim or complaint.



5. Indemnity

Product	No. of policies	No. of Indemnity Referrals	No of claims	% Against claims number	% Against policies number	Declinature	Policy Amend or Proportionality	Full indemnity
Classic Car (SWH)	1829	0	5	0.0%	0.0%	0	0	0
Enthusiast	5319	4	94	4.3%	0.1%	0	1	3
PL DA Enthusiast	22377	18	593	3.0%	0.1%	0	1	17
Rallies	6	0	6	0.0%	0.0%	0	0	0

The volume of indemnity referrals has raised no concern. There were only 22 referrals in 2025 and none of those led to a claim being declined. The fact that just 3.2% of claims resulted in a referral indicates that fair value is being offered as risks are not requiring alteration at claims stage.

2 referrals required the application of proportionality, and the remainder were all fully indemnified.

The leading cause of referral, with 41% of referrals across the whole product was misrepresentation of overnight storage location. This is a common referral reason across all retail products as a client's definition of their own storage location can often differ to ours without there being any intent to deceive. Given the low volume of referrals, there is no real pattern to take away from the data.

There were only 2 referrals that required the application of proportionality and 91% of all indemnity referrals received resulted in full indemnification, this indicates fair outcomes for policyholders.

There were no voidances resulting from indemnity referrals across the Enthusiast product in 2025. There was one complaint recorded due to the declinature of a claim, but this did not come from an indemnity referral.

Overall, the indemnity process is identifying potential risks outside of Underwriters appetite, the decisions taken are deemed to be fair.

RAG Status

6. Cancellations

Product	Policy count	Prior to Inception	1-14 days	15-90 days	91+ days	Total cancellations
Classic Car (SWH)	1,829	17	83	57	33	190
Enthusiast	5,319	110	51	109	102	372
PL DA Enthusiast	22,377	188	206	406	575	1,375
Rallies	6	0	0	1	1	2
Total	29,531	315	340	573	711	1,939

There were 1,939 cancellations recorded in 2025. This constitutes 6.6% of the policies written, which is very consistent with 2024 when the cancellation rate was 6.8%.

The most common reason recorded for both Classic Car (SWH) and PL DA Enthusiast cancellations was 'EDI Cancellation' which made up 95% and 89% of the reasons recorded respectively. There is no further information, other than notes on a very small number of policies, as the policies are managed by the broker and transmitted to ERS via EDI.

The most common reason for cancellation for the Enthusiast schemes was the vehicle being sold. This is not something that can be controlled by ERS and there will always be a number of cancellations for this reason in all products. The fact that it is the most common reason is, in itself, an indication that this area of the product is well put together and meeting client's needs.

The only cancellations where a product-based reason was cited turned out to be instances beyond our control. In some cases, the file was a sale of vehicle that was incorrectly labelled, in others the risk profile of the client had change to the extent that they no longer fitted the appetite of the product.

There were two complaints related to the Cancellation/Voidance of a policy. In both cases, the complaints were deemed to be not justified they did not escalate further to Lloyds or the ombudsman.

Overall, there have been no cancellation concerns identified, and the evidence suggests the product is meeting customer demands and needs and offering Fair Value.

RAG Status

7. Commission

Product	2023	2024	2025	2025 forecast
Classic Car (SWH)	15.17%	15.89%	13.44%	12.5%
Enthusiast	13.11%	14.64%	13.13%	N/A
PL DA Enthusiast	18.04%	16.54%	16.86%	N/A
Rallies	20.63%	21.57%	18.26%	N/A

Commissions rates have remained largely consistent when compared to previous years, with a slight drop seen in Classic Car (SWH). This is a good indicator that prices are not being inflated.

Broker commission rates and fees are submitted via Fair Value Assessments, any commissions out of scope must provide a reasonable explanation and be agreed by the Broker Performance Group (BPG).

Commission Outliers

Underwriter Kerrie Jones advised that there are some delegated authority brokers who write at a higher commission. Gott and Wynne are an example of this as they write at 18% even when putting business through the SWH scheme. This is allowed in the interest of consistency and simplicity with the broker rather than assigning them different commission levels depending on which scheme they use. These arrangements account for why the average commission on Classic Car (SWH) is above the forecast figure.

Underwriters advised that there were no outliers in term of commission for Enthusiast or PL DA Enthusiast. Some schemes carry higher commission than others, but this is in line with the level of service offered and the specialist nature of the schemes.

Overall, no concerns have been raised with commission rates.

RAG Status

8. Broker Conduct

Each broker must commit to ERS levels of service via a Terms of Business Agreement (TOBA). ERS and broker TOBA's ensure brokers adhere to Lloyds Oversight principles and Consumer Duty standards including the four outcomes:

- Products and Services
- Price and Value
- Customer Understanding
- Customer Support

There is a requirement for brokers to annually submit their Fair Value Assessment (FVA) for each product traded and they must declare any commissions or fees charged to customers.

Broker service is monitored via the Broker Performance Group (BPG), any commission or fee exceptions are challenged and approved/rejected depending on the level of services provided.

ERS must comply to a FCA best endeavour to obtain FVA's from at least 70% GWP of brokers. In 2025, 75% was achieved raising no concerns.

The most recent attestation covering this product (12/01/2026) and the 2025 Conduct Risk Committee minutes have been reviewed to consider broker service for this product, there were no concerns identified.

In summary, there is nothing to suggest that broker service is impacting the performance of this product.

RAG Status



9. Service

Providing customers with appropriate information in a timely manner is part of ICOBS 6 – a firm must ensure that a customer is given appropriate information about a policy in good time and in a comprehensive form so that the customer can make an informed decision about the arrangements proposed.

This also relates to the FCA Principles for business, Consumer Principle 12 – Consumer Duty 'A firm must act to deliver good outcomes for retail customers.' The Contract Certainty is a measure of the support offered to customers by receiving the product information in a reasonable timeframe.

Contract Certainty has an SLA of >95%. The contract certainty for Bespoke (PL Bespoke & PL DA & Affinities) in 2024 was 98.96%.

We therefore determine customers are receiving essential documents for Enthusiast within good time, enabling them to make informed decisions about the product.

RAG Status



10. Additional Products

Product	Classic Car (SWH)		Enthusiast	
	Embedded	Add-on	Embedded	Add-on
Protected No Claims Bonus (PNCB)	X	X	X	X
Legal expenses	X	X	X	X
Breakdown cover	X	X	X	X
Gap cover	X	X	X	X
Key cover	X	X	X	X
Hire car cover	X	X	X	X
Premium finance	X	X	X	X
Other products	X	X	X	X

Product	PL DA Enthusiast		Rallies	
	Embedded	Add-on	Embedded	Add-on
Protected No Claims Bonus (PNCB)	X	X	X	X
Legal expenses	X	X	X	X
Breakdown cover	✓	X	X	X
Gap cover	X	X	X	X
Key cover	X	X	X	X
Hire car cover	X	X	X	X
Premium finance	X	X	X	X
Other products	X	X	X	X

Breakdown is embedded within the PL DA Enthusiast policies that are sold by one broker (Need To Insure) and are offered as standard as part of the policy wording, rather than an add-on. There were only 2 complaints recorded as being related to breakdown cover. In both cases, the complaint was service related rather than caused by the product itself.

Due to the low volume of complaints, and the enhancements that this element offers, it is concluded that fair value is offered by these additions to the policy wording.

RAG Status

11. Pricing

Prior to the commencement of the product review a standardised question set was sent to the pricing team to obtain the pricing strategy for the products in question and ensure Fair Value is considered. The following information was provided by Thomas Milton, Pricing Manager.

PL DA Enthusiast	
Question	Response
Please confirm whether this product is net priced (NB: If yes, please provide full details below)	Product is not net rated.
Please confirm how the price charged to the customer is determined (NB: Please identify any DA arrangements and their methodology of pricing)	There are a number of ICE schemes which fall into this category, serviced by various brokers with a mixture of full delegation, own rates (approved by ERS) or a rating calculator.
Please confirm the pricing model for new business and renewals	The dual pricing wording shown in the guides is below. Where the broker is not a coverholder, the wording is amended slightly to reflect this: "It is the responsibility as the Coverholder, who determines the pricing under this binding authority to the policyholder, to ensure that New Business and Renewal must be priced on a consistent and comparable basis in line with the requirements of FCA's Dual Pricing principles that states 'the renewal price should be no higher than the Equivalent New Business Price (ENBP) the firm offers'."
Please confirm if there have been any significant changes to the pricing model in the last year or if there are any planned within the next 12 months. If yes, please provide a detailed explanation.	No significant changes
Please provide a summary of the key components of the pricing model used to calculate the risk premium.	Risk Premium is determined at a burn cost level and includes various factors relating to risk. Components include driver, area, vehicle and claims.
Please provide a summary of the key components of the pricing model used to calculate the risk premium.	Commission rates can range from 10%-30%

Classic Car (SWH) and Enthusiast

Question	Response
<p>Please confirm whether this product is net priced (NB: If yes, please provide full details below)</p>	<p>Product is not net rated.</p>
<p>Please confirm how the price charged to the customer is determined (NB: Please identify any DA arrangements and their methodology of pricing)</p>	<p>The technical premium calculation is split into two parts: Risk Pricing and Street Pricing. However, the majority of the policies are manually written by Underwriters with the pricing models used as guidance.</p> <p>Risk Pricing Each head of damage has a frequency (defined as the proportion of claims → Number of Claims/ Vehicle Exposure) and severity(defined as the average claim amount → Total Claims Incurred/ Number of Claims) model to provide an estimated burn cost(defined as the average cost of claims → Total Claims Incurred / Vehicle Exposure) for any customer. These are currently modelled using GLM methods. Factors include declared risk factors, data enrichment (consumer and vehicle) as well as Area and Vehicle groupings (Extreme Gradient Boosting (XGBoost) and K-Nearest Neighbours (KNN) respectively).</p> <p>As with all products with technical models which underpin the pricing, base rates are calibrated on quarterly basis with an allowance for latest reserve development and view of inflation.</p> <p>Street Pricing → This layer includes extra rate applied in order to achieve the product’s target loss ratio, PNCD cost, minimum premium, commission and IPT.</p> <p>This premium is then supplied to the underwriter who can chose to use it, use it as guidance or provide a better premium to the customer</p>
<p>Please confirm the pricing model for new business and renewals</p>	<p>New Business and Renewals are processed through the same pricing model. Some discounts are applied to renewals in a selection of the risk models. A discount is applied to renewal customers in the street layer.</p> <p>To avoid any dual pricing concerns, we have a tenure neutral version of the risk premium calculated to feed into any factors that use it.</p> <p>For example, in the street layer there is a factor which uses a banded-up version of risk premium to apply extra rate. This applies extra rate when the risk cost is lower.</p> <p>We found that because the equivalent renewal quote receives discounts in the risk models, there were cases that the final premium was higher for the renewal premium than it would be for a equivalent new business premium.</p> <p>To solve this issue, we use a tenure neutral version of risk premium to calculated this extra loa</p>

<p>Please confirm if there have been any significant changes to the pricing model in the last year or if there are any planned within the next 12 months. If yes, please provide a detailed explanation.</p>	<p>Yes, in June 2024 Pricing Committee sign off was received and implementation went ahead with the new version of the Damage (AD, TPD, WS, FT) frequency models. These models using machine learning methods, specifically a Regression model built with XGBoost package. These models use the capabilities within DSS. The models were subject to stringent reviews both for the performance of the review and compliance of the models. For example, tenure was left out of the model due to not being able to control for dual pricing.</p>
<p>Please provide a summary of the key components of the pricing model used to calculate the risk premium.</p>	<p>Actual Damage: Frequency and Severity Third Party Damage: Frequency and Severity Verifiable Bodily Injury (high severity injuries, e.g. broken bones, paraplegia etc.): Frequency and Severity Non-Verifiable Bodily Injury (low severity injuries, e.g. whiplash): Frequency and Severity Fire and Theft Damage: Frequency and Severity Windscreen Damage: Frequency and Severity Large Actual Damage and Fire and Theft: Burn Cost Risk overlay: Burn cost</p>
<p>Please provide a summary of the key components of the pricing model used to calculate the risk premium.</p>	<p>Brokers receive 12.5% commission with a few exceptions as mentioned in the Commission section of the review</p>

Pricing have confirmed that there are sufficient measures in place to ensure there is no customer detriment at renewal and dual pricing concerns have been considered. Whilst there is a variation in commission by broker, each exception is considered in the Broker Performance Group, and some brokers will offer more of an enhanced sales service. We therefore determine this product is offering fair value.



12. Complaints

	2024 Total written policies	2024 Complaint total	% of complaints v written policies	Justified complaints	% of complaints which were justified	Escalations to Lloyds/FOS
All ERS complaints	360,170	3,701	1.03%	1,401	38%	-
Classic Car (SWH)	1,829	4	0.2%	2	50%	0
Enthusiast	5,319	27	0.5%	8	30%	1
PL DA Enthusiast	22,377	89	0.4%	33	37%	3
Rallies	6	0	0%	0	0%	0
Total	29,531	120	0.4%	43	36%	4
Lloyd's indicators	-	-	2%	-	40%	-

Complaint volumes have been very low when compared to written policies at 0.4%, which is well below Lloyd's target of 2%.

The main area of focus for complaints is the percentage of upheld complaints v. total complaints. Lloyd's guidance/indicator for this is not more than a 40% ratio.

The overall product has a justified rate of 36% which below the Lloyds target. This slightly better than the justified rate for ERS as a whole. Whilst there is always room for improvement, this suggests Enthusiast was one of the products driving good complaints performance in 2025 and that good decisions are being made in this area on the whole.

There was no real pattern to the causes of complaint, with a wide range of reasons being given. "Further damage cause by salvage agent" and "Lack of communication" were the top reasons for Enthusiast and PL DA Enthusiast respectively but both only accounted for around 10% of complaints received.

Classic Car (SWH) or Rallies only generated 4 complaints in total across all the polices in those areas. There were 2 complaints regarding cancellation, but these were deemed not justified and the cancellations stood. There was also 1 complaint regarding a declined claim, and this was deemed justified, with the claim being settled in the end.

4 Enthusiast files were escalated to Lloyd's. All 3 were deemed justified by Lloyd's but none were related to issues with the product itself. They related to communication, repair quality, and vehicle valuation.

There were a few disputes about premiums, but no complaints which directly related to the make up of the Enthusiast product. We therefore determine the Enthusiast product is offering fair value and will continue to monitor complaints by exception and manage expectations.

RAG Status

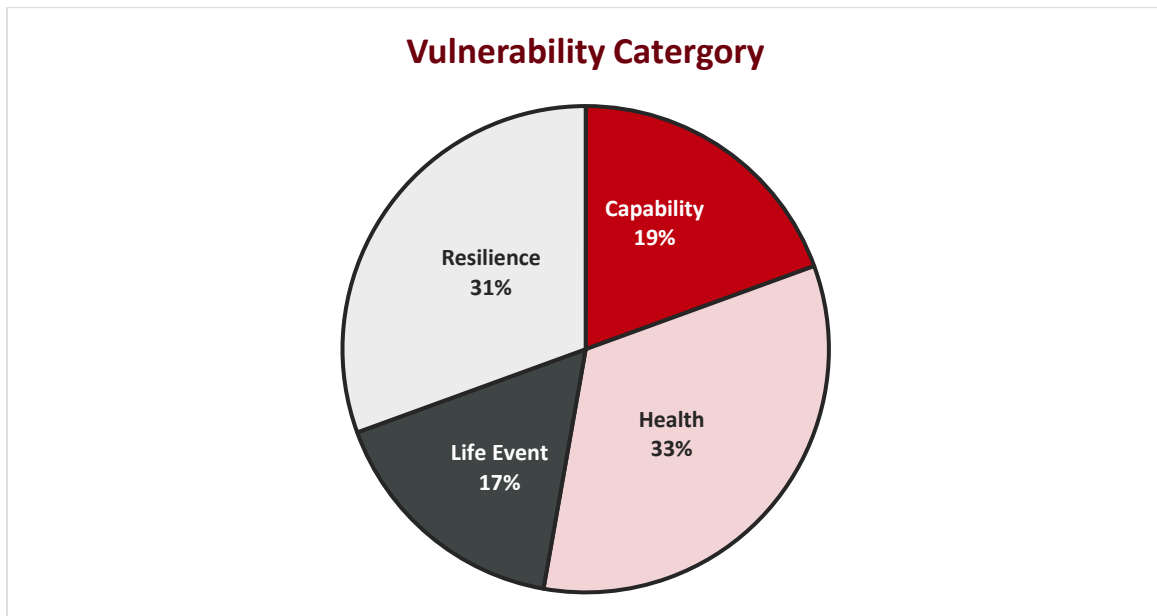
13. Vulnerable Customers

Product	No. of VC identified	VC V policies written	Top VC Category	VC complaints	VC cases escalated to Lloyds or FOS
Classic Car (SWH)	1	0.05%	Life Event	0	0
Enthusiast	2	0.04%	Resilience	1	0
PL DA Enthusiast	23	0.1%	Resilience	12	0
Rallies	0	0.0%	N/A	0	0

There were 26 Vulnerable Customers (VC) identified within Enthusiast in 2025. In addition to tracking all identified vulnerable customers, ERS has included a 'missed opportunity' review within monthly first line of defence audits giving further reassurance.

There were 13 VC complaints recorded, but none of these were escalated to Lloyd's. In all cases, the vulnerabilities were not directly relevant to the complaints themselves but were recorded for good practice.

Vulnerable customers can be further broken down into four subcategories. The chart below displays the distribution of VC's seen in the Enthusiast product in 2025.



There was a fairly even spread of vulnerabilities across the Enthusiast in 2025 with the most common category being Healthy. This category encompassed both physical and Mental health and it is not a huge surprise to see this as the most common category for the product. Enthusiast offers several classic car policies, and the demographic incorporates a lot of clients who would be considered elderly. As a result, the likelihood of health-based vulnerabilities is higher than some other areas. Overall, we are satisfied that every opportunity is being taken to identify and support vulnerable customers and have included case summaries within Appendix 3 to demonstrate our handling of vulnerabilities. We therefore determine that this product is helping all customers meet their financial objectives.



14. Financial Crime

There is a current due diligence/referral process in place for all lines of business and syndicates. This remains unchanged from last year. ERS predominately writes business within the UK and the overall Financial Crime risk has been assessed as low. However, as part of ERS' ongoing financial crime checks they consider the following:

- **Anti-Money Laundering** – All ERS staff will receive AML training that will remind them of their obligations in respect of suspicious transaction reporting and include a reminder about 'tipping off' and the MLRO contact details. There were no anti-money laundering reports logged for 2025.
- **Sanctions** – All policies and claims are analysed by SIRA (a fraud prevention and detection system) daily. Any exceptions are flagged to the ERS Policy Validation Team with support from the ERS Financial Crime team for further review and investigation.
- **Fraud Risk** – ERS consider internal and external fraud, more specifically – employee, supplier, and claimant fraud. ERS' IT department monitor all email accounts for suspicious activity, obtain information about attempted and successful fraud through our distribution chain and monitor claims/policies with a dedicated in-house fraud team.
- **Anti-Bribery and Corruption** – ERS log all gifts and hospitalities over £100 and provide training to all staff to remind them of their obligations. Additionally, all internal expenses claims are monitored by our internal Financial Crime team.

ERS have a sufficient and wide-ranging financial crime risk framework in place to ensure that any breaches will be flagged and tackled in good time. We are confident that the financial crime compliance strategy ensures there are no unfair practices that could cause detriment to customers.

A horizontal bar with a red section on the left and a green section on the right. The text "RAG Status" is centered in the red section.

RAG Status

15. Policy wording

Product	Enthusiast	
Wording version	ACENTH-1122, GBPC-0125, ACCC-0323	
Check	Result	Comments/Feedback – Action required?
Flesch-Kincaid reading ease score:		52.6 – Readable at the age of 16-17
Coleman-Liau Index Readability:		11.69 – Readable at the age of 16-17
Target demographic		17-95
Spelling / grammar Format / layout Wording appropriate against the Product Appetite		Minimum age of driving is 17 years old; the readability scores have been deemed acceptable
Correct References to the Active Underwriter		Wording references Martin Hall, signature to be removed at the next update
Lloyd’s Simplification complied with?		Policy booklet has been produced in line with the new style template, with improved sections for simplification
Correct and appropriate branding		
Legal footers		
Contact details (email, telephone, postal)		
ICOBs complied with?		
FCA regulations complied with?		
On most up to date template and cover?		<p>On the most up to date template. ACENTH and ACCC both require:</p> <ul style="list-style-type: none"> • Add Electric Vehicle definition and Leased battery/Charging cable cover. • Add a Sanctions limitation clause in line with Lloyd’s wording. • Add Bosnia and Herzegovina and Montenegro to the list of countries permitting travel. • Add in Uninsured Driver Cover. • Update misrepresentation section to allow removal of all connected policies. • Add email as an acceptable method for sending out cancellation notices. • Amend the Driving other cars wording. • Remove references to guaranteed courtesy cars to reflect current market conditions.
IPIDs correct and contain all significant features/benefits?		
NTP up to date / any notifications need removing?		
Conclusion	Full assurance	

Due to the limitations of Flesch-Kincaid, some elements, such as table, and lists, make it difficult to calculate. In order to consider ease of use for customers we have considered the following three key areas of the policy wording to assess for readability:

- Complaints
- Cancellations
- Section 2 – Loss of or damage to your vehicle

The average of these scores is 52.6, which is deemed acceptable as insurance policies are legal contracts and are therefore expected to be slightly more complex than an average passage of text.

In order to provide assurance that the wording is not overly complex, we have also utilised the Coleman-Liau Index, and tested the whole wording, which has provided the same outcome.



16. Competitor analysis

An analysis of the following top competitor's policy wording has been carried out.

For Classic car schemes this was:

1. Highway (Allianz)
2. KGM – Specialist Vehicle
3. Markerstudy

For Enthusiast schemes:

1. KGM – Specialist Vehicle
2. Markerstudy

A total of 50 sections of comparable policies were reviewed. The review showed that ERS offer a competitive product in both areas. The below areas are the highlights, these are the only areas where we sit fully ahead, or fully behind the competition. In all other areas, we either match everyone or sit in between the competitor products.

ERS Classic offers less cover

Cover	ERS Classic Car	Highway (Allianz)	KGM	Markerstudy
Lock replacement limit	£500	£750	£750	£1,000
Child seat limit	£150	No Limit Mentioned	No Limit Mentioned	No Limit Mentioned

ERS Classic offers more cover

Cover	ERS Classic Car	Highway (Allianz)	KGM	Markerstudy
Cyber Liability Cover	Yes	No	No	No
Death benefit	£7,000	£5,000	£5,000	£5,000
Inflatable Storage Device	£500	No	No	No

ERS Enthusiast offers less cover

Cover	ERS Enthusiast	KGM	Markerstudy
WS approved repair excess	£25	£0	£0
Overnight Accommodation	No	£300	£500
Lock replacement limit	£500	£750	£1,000
Child seat limit	£150 each (2 seats)	No Limit stated	No Limit stated

ERS Enthusiast offers more cover

Cover	ERS Enthusiast	KGM	Markerstudy
Cyber Liability Cover	Yes	No	No
EV - Leased Batteries	Yes	No	No
EV - Charging Cable	Cover under personal belongings	No	No
Inflatable storage device	£500	No	No
Track Day option	Yes	No	No

The fact that there are few highlights listed above is an indication of just how closely matched we are to our competitors. All offer similar levels of cover with some pros and cons for each company.

Our obvious competitiveness and near parity with the market in a lot of areas suggests our product is well designed to meet the needs of the target market and offers fair value.

The table in Appendix 2 shows the full comparison data.

RAG Status	
------------	--

17. Distribution

The below table has been filled in, by Underwriters in charge of each scheme, to outline the chosen distribution method for the Enthusiast product.

		Classic Car (SWH)	Enthusiast	PL DA Enthusiast and Rallies
ERS's role	Manufacturer	X	X	X
	Co Manufacturer			X
	Distributor			
Distribution Channel(s)	Broker (Open market)	X	X	
	Broker (Single broker or Platform)			X
	Direct to Commercial Client			
	Direct to Consumer			
	Delegated arrangements			X
	Other			
Broker Distribution Method(s)	Face to Face	X		
	Telephone	X		
	Online Journey	X	X	X
	Webchat			
	Postal			
	Email	X	X	X
ERS Trading Method(s)	E-Trade		X	
	Software houses	X		
	Manual Underwriting		X	X
	Plug in to ERS (PIERS)			
Type of Sale	Advised		X	
	Non-Advised	X		
	Advised & Non-Advised			X
Underwriter Distribution Assessment	Distribution method appropriate	X	X	X
	Distribution method not appropriate			
Why is this Distribution method appropriate?	These are the standard distribution methods used across the respective markets.			

The distribution model for the Enthusiast product varies between the different areas but all remain appropriate and continue to support good customer outcomes. Classic Car (SWH) and Enthusiast Business is placed via approved brokers using Software houses and/or eTrade, which ensure risks are written within appetite, underwriting intent is preserved, and customers benefit from efficient access to cover. The controlled distribution channels also provide ERS with effective oversight of brokers through TOBA standards, annual Fair Value Assessments, and BPG governance.

eTrade creates operational efficiencies by integrating directly with ERS' pricing models and back-end systems, reducing manual intervention, and enabling consistent application of underwriting rules. Appetite controls are embedded into the systems so that any out-of-appetite risks are automatically declined or referred, reducing the likelihood of mis-sale or unsuitable placement. This is supported by demographic data showing policies are being written within appetite with no systemic exceptions.

For customers, the distribution routes offer convenience and speed, particularly via eTrade, while ensuring that pricing remains competitive through real-time technical and market-adjusted premiums. Broker expertise remains integral to ensuring appropriate risk placement and customer understanding of the product, with no evidence from complaints or cancellations to suggest that distribution routes are causing detriment.

In the case of PL DA Enthusiast and Rallies, ERS trade manually with brokers and each broker will potentially have it's own bespoke set of answers to the questions posed in the table above. This is due to the varying nature of each brokers target market and covering their own specific niche within the motor Enthusiast world (e.g. National Street Rod Association, Morgan Modern Transfer, etc.). Working manually with these brokers is the most effective and efficient way to approach such a diverse book of business and make sure all customers are catered to fairly.

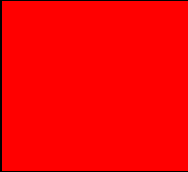


Overall, the distribution framework is robust, well-aligned to the target market, and subject to appropriate governance and oversight. There are no indicators of Consumer Duty concern or need for intervention.



18. Fair Value Assessment

Purpose of the product review	<p>The purpose of the review is to provide assurance that the product and the way it is distributed delivers fair value to the identified target market.</p>
How we assess the product performance	<p>Our product review assesses a range of key metrics including:</p> <ul style="list-style-type: none"> • Coverage offered across all the schemes for the product. • Benchmarking across the motor insurance market • Identification of strengths and weaknesses • Adherence to regulatory standards and laws • Review of all supporting insurance documentation • Product volume and average premiums against underwriting plans • Cancellation reasons and quantitative information • Claims performance (complaints, frequency, average claims costs, etc.) • Claims declination and indemnity referrals • Output from broker conduct risk and Coverholder audits • Consideration of the selection and appropriateness of the brokers and distribution channel(s) • Financial Crime • Additional products offered • Vulnerable customers considered to ensure treated correctly and no poor outcomes. <p>Each section is assessed based on internal tolerance thresholds which are monitored routinely, and product review outcomes must be approved by the Product Oversight Group (POG).</p>
How we address any concerns	<ul style="list-style-type: none"> • Any recommendations will be presented to the product owners • Actions are expected to be completed within 3-6 months depending on severity • If the product is deemed to be not offering fair value or performing as expected, then product redesign or possible withdrawal should be considered.
Overall outcome	<p>The product, processes and controls in place mitigate the key risks arising in the area under review to a material degree. As such, product complexity and advice, service risks, sales and distribution risk and customer impact are minimal.</p>

Appendix 1: RAG Definitions

	<p>The product, processes and controls in place highlight key risks arising in the area under review to a material degree. As such, product complexity and advice, service risks, sales and distribution risk and customer impact are deemed high risk.</p>
	<p>The product, processes and controls were adhered to in line with relevant rules, requirements, and guidance. However, there are areas where further consideration for tighter controls or processes have been highlighted.</p>
	<p>The product, processes and controls in place mitigate the key risks arising in the area under review to a material degree. As such, product complexity and advice, service risks, sales and distribution risk and customer impact are minimal.</p>

Appendix 2: Classic Car and Enthusiast wording comparisons

Red	ERS cover is significantly less
Amber	ERS offers less cover
Green	ERS offers better cover
Clear	ERS offers same level of cover

Cover	ERS Classic Car	Highway (Allianz)	KGM	Markerstudy
Third party property damage limit. Car/Another vehicle	£20m	£20m	£20m	£20m
Costs and expenses limit	£5m	£5m	£5m	£5m
Legal costs limit	£35,000	No Limit Mentioned	No Limited Mentioned	No limit Mentioned
Driving other vehicles	Yes	Yes	Yes	Yes
Towing	Yes	Yes	Yes	Yes
Cyber Liability Cover	Yes	No	No	No
EV - Leased Batteries	No	Yes	No	No
EV - Charging Cable	No	Yes	No	No
Automated Vehicle Cover	No	Yes	No	No
Emergency medical treatment	Yes	Yes	Yes	Yes
Additional non-approved repairer excess	No	Schedule	No	No
Young/elderly/ inexperienced drivers excess	Under 21 - £300 21-24 - £200 25+/Inexperienced - £200	Schedule	Under 21 - £1000 21-24 - £500 25+/inexp - £250	Under 20 - £200 21-24 - £200 25+/inexp - £150

Cover	ERS Classic Car	Highway (Allianz)	KGM	Markerstudy
Windscreen cover	Yes	Yes	Yes - £500 limit	Yes
WS approved replacement excess	£75	Schedule	See schedule	£100
WS approved repair excess	£10	Schedule	£0	£0
WS non-approved repair/replace excess	Yes	Schedule	See schedule	See Schedule
Total loss - most we will pay	Market value / schedule value - whichever is less	Market Value	Market Value/ Schedule Value	Market Value/ Schedule Value
Overnight Accommodation	No	No	£300	£500
Onward Travel	No	No		
Courtesy car with approved repairer	Yes	Guaranteed hire car for the same purpose	No mention	Yes
Recovery and redelivery	Yes	Yes	Yes	Yes
New vehicle replacement	No	No	No	Yes - 12 months Covered less than 10k miles
Vehicle Accessories	No	No	No	No
Audio / visual cover (non-factory fitted)	Yes	No	Yes	Yes
Audio / visual limits	£500	N/A	£500	£1,000
Trailer cover	No	No	No	No
Misfuelling	No	No	No	No
Medical Expenses	Yes	Yes	Yes	Yes
Medical expenses limit	£500	£150	£500	£200

Cover	ERS Classic Car	Highway (Allianz)	KGM	Markerstudy
Personal accident benefits	Yes	Yes	Yes	Yes
Death benefit	£7,000	£5,000	£5,000	£5,000
Loss of limb	£5,000	£5,000	£5,000	£5,000
Loss of sight	£5,000	£5,000	£5,000	£5,000
Maximum limit	£7,000	£5,000	£5,000	£10,000
Personal belongings	Yes	Yes	Yes	Yes
Personal belongings limit	£300	£100	£300	£1,000
Lock replacement cover	Yes	Yes	Yes	Yes
Lock replacement limit	£500	£750	£750	£1,000
Child seat cover	Yes	Yes	Yes	Yes
Child seat limit	£150	No Limit Mentioned	No Limit Mentioned	No Limit Mentioned
Foreign use	Yes	Yes	Yes	Yes but must be requested in advance
Day limit	90 days	90 days	90	30
Trip limit	No limit	No Limit Mentioned	No limit	Max 90 days
Extra cover option	Yes	Yes	Yes	Yes
Inflatable Storage Device	£500	No	No	No
Uninsured driver cover	No	No	No	Yes
UK Breakdown Assistance	No	No	No	Yes
Drugs/alcohol clause	Yes	Yes	Yes	Yes
Pro rata refund	No	If within 14 day cooling off period.	No	Yes
Legal expenses included	No	No	No	No

Cover	ERS Enthusiast	KGM	Markerstudy
Third party property damage limit. Car/Another vehicle	£20m	£20m	£20m
Costs and expenses limit	£5m	£5m	£5m
Legal costs limit	£35,000	No Limited Mentioned	No limit stated
Driving other vehicles	Yes	Yes	Yes
Towing	Yes	Yes	Yes
Cyber Liability Cover	Yes	No	No
EV - Leased Batteries	Yes	No	No
EV - Charging Cable	Cover under personal belongings	No	No
Emergency medical treatment	Yes	Yes	Yes
Additional non-approved repairer excess	No	No	No
Young/elderly/inexperienced drivers excess	Under 21 - £300 21-24 - £200 25+/Inexp - £200	Under 21 - £1000 21-24 - £500 25+/inexp - £250	Under 20 - £200 21-24 - £200 25+/inexp - £150
Windscreen cover	Yes	Yes - £500 limit	Yes
WS approved replacement excess	£100	See schedule	£100
WS approved repair excess	£25	£0	£0
WS non-approved repair/replace excess	Yes	See schedule	See Schedule
Total loss - most we will pay	Market value / schedule value - whichever is less	Market Value/ Schedule Value	Market Value/ Schedule Value

Cover	ERS Enthusiast	KGM	Markerstudy
Overnight Accommodation	No	£300	£500
Courtesy car with approved repairer	Yes	No mention	Yes
Recovery and redelivery	Yes	Yes	Yes
New vehicle replacement	Yes if less than 12 months old	No	Yes - 12 months Covered less than 10k miles
Audio / visual cover (non-factory fitted)	Yes	Yes	Yes
Audio / visual limits	£500	£500	£1,000
Spare Parts	No - only covers dismantled parts	10% of value up to £1000 limit	No
Trailer cover	No	No	No
Misfuelling	No	No	No
Medical Expenses	Yes	Yes	Yes
Medical expenses limit	£500	£500	£200
Personal accident benefits	Yes	Yes	Yes
Death benefit	£7,000	£5,000	£5,000
Loss of limb	£5,000	£5,000	£5,000
Loss of sight	£5,000	£5,000	£5,000
Maximum limit	£7,000	£5,000	£10,000
Personal belongings	Yes	Yes	Yes
Personal belongings limit	£300	£300	£1,000

Cover	ERS Enthusiast	KGM	Markerstudy
Cherished Plate	£10,000	No	No
Lock replacement cover	Yes	Yes	Yes
Lock replacement limit	£500	£750	£1,000
Child seat cover	Yes	Yes	Yes
Child seat limit	£150 each (2 seats)	No Limit stated	No Limit stated
Foreign use	Yes	Yes	Yes but must be requested in advance
Day limit	90 days	90	30
Trip limit	No limit	No limit	Max 90 days
Extra cover option	Yes	Yes	Yes
Inflatable storage device	£500	No	No
Uninsured driver cover	No	No	Yes
Track Day option	Yes	No	No
UK Breakdown Assistance	Yes	No	Yes
Drugs/alcohol clause	Yes	Yes	Yes
Pro rata refund	No	No	Yes
Legal expenses included	No	No	No

Appendix 3: Affinities Vulnerable Customer - Case Studies

Scheme	<ul style="list-style-type: none"> • Scheme 5621
Vulnerability Category	<ul style="list-style-type: none"> • Health
Vulnerability Detail	<ul style="list-style-type: none"> • PH has advised that he has the onset of Parkinson’s Disease
Actions Taken	<ul style="list-style-type: none"> • Vulnerable flag entered on claims file for awareness, handlers instructed to speak slowly and clearly.
Complaint	<ul style="list-style-type: none"> • No complaint
Customer Outcome	<ul style="list-style-type: none"> • Greater awareness to accommodate PH vulnerability • Claim progressed to PH satisfaction
Conclusion	<ul style="list-style-type: none"> • Vulnerable customer correctly identified and recorded • Reasonable adjustments made to accommodate the vulnerability

Scheme	<ul style="list-style-type: none"> • Scheme 7360
Vulnerability Category	<ul style="list-style-type: none"> • Capability
Vulnerability Detail	<ul style="list-style-type: none"> • Policyholder (PH) was upset and distressed when reporting the incident as he had collided with a child.
Actions Taken	<ul style="list-style-type: none"> • Vulnerable flag entered on claims file • Notes to advise handlers to show empathy and sympathy for at the policyholder had experienced.
Complaint	<ul style="list-style-type: none"> • No complaint
Customer Outcome	<ul style="list-style-type: none"> • Greater awareness to accommodate PH vulnerability • AD Claim progressed to PH satisfaction • TP PI claim remains open
Conclusion	<ul style="list-style-type: none"> • Vulnerable customer correctly identified and recorded • Reasonable adjustments made to accommodate the vulnerability in future contact

