

International private health insurance for Small and Medium Enterprises (SMEs)

Target market and product governance

This document will help you better understand the **target market and expected distribution strategy** for our Global Health Adapt and Islands Health Adapt products co-manufactured by AXA Global Healthcare (UK) Limited and AXA PPP healthcare Limited.

It also outlines our **approach to Product Governance** to demonstrate how we design, monitor and review our products to ensure they continue to deliver value, meet the needs, characteristics and objectives of the target market including any vulnerable or potentially vulnerable customers.

Target market statement

| Product name | Global Health Adapt |
|----------------------------------|---|
| Product type | International private medical insurance |
| Product status | This product is open to new business |
| Who is the product designed for? | This product is designed to provide group international private healthcare cover for employees, directors or other nominated people associated with an active trading company. The product would therefore appeal to a target SME market which has: |
| | a legal status that allows them to contract with AXA Global Healthcare (UK) Limited on a group insurance basis; a group size of 2 to approximately 74 lead members; the financial resources to pay for international private healthcare for its employees and other eligible members; an interest in proactively investing in the health and wellbeing of their employees and other eligible members; a desire to provide access to international private medical treatment of illnesses, diseases or injuries that arise after they join the policy to support a return to health and work quickly to minimise the impact for both the individual and the organisation; and a need to provide private medical cover as part of a competitive rewards package to attract new recruits and retain existing employees. |
| | The product is designed to provide group cover to employees and other eligible members who are considered to be one of the following: |
| | Expatriate worker – employees and other eligible members who reside and work in a country other than their native home country. For these members SMEs are looking for healthcare cover that allows employees and other eligible members the flexibility to receive medical treatment locally, outside of their country of residence or that allows them to return to their native home country for medical treatment. Globally mobile employees - employees and other eligible members who regularly travel for work and require more comprehensive cover than the emergency health cover provided under a travel policy. For these members SMEs are looking for healthcare cover that allows employees and other eligible members the flexibility to receive medical treatment locally, return home for treatment or the option to travel to another country for treatment. Directors, senior management and skilled staff – employees who are critical to the day to day running of the SME and as a result there is |
| | the desire to provide cover to ensure access to the best possible medical treatment globally. This is to help support a return to health and work quickly to minimise the impact for both the individual and the organisation. |

There is a lower age limit of 16 for employees. There is no minimum age for dependants. The maximum age for all eligible members is 80 at the point of joining the policy.

The product is designed to:

- meet the needs of a broad spectrum of potential requirements by offering a range of plan levels, optional benefits and underwriting methods;
- be priced with reference to the lead member and eligible members ages;
- extend to include a partner of the lead member, dependent children of the lead member or partner's children and adopted children; and
- provide cover options to the groups for employees, director and other associated individuals, at the discretion of the group secretary and as agreed with AXA Global Healthcare (UK) Limited.

Who is the product not designed for?

These products are not designed for:

- SMEs registered within a country subject to international sanctions or who are directly subject to sanctions themselves;
- employees and other eligible members who reside, or would intend to travel for treatment, in a country subject to international sanctions;
- employees and other eligible members who are looking for corporate travel insurance to cover emergency medical treatment for trips of up to 95 days;
- SMEs with employees or other eligible members who require cover for treatment as a result of training or taking part in any sport for which they are paid, receiving a grant or bursary or competing for prize money;
- where individuals covered under the product fund their own costs of cover outside of a salary sacrifice arrangement with their employer; or
- employees and other eligible members who reside in a country that requires locally admitted cover for the provision of local healthcare but would intend for their private health insurance to cover them locally as well as abroad.

Before choosing this product SMEs will need to consider any employees or eligible members who have access to state provided healthcare and how their international private healthcare cover would interact with their local provision.

Aside from this, there are generally no SMEs who would not benefit from this product.

What are the main product features that will be compatible with the health and wellbeing needs, characteristics and goals of the target market?

This comprehensive private health insurance product provides employees and other eligible members with access to a range of services for eligible conditions, diagnostics and treatments.

A fully comprehensive private international health insurance product may be out of reach for some SMEs, so Global Health Adapt's modular structure provides flexibility, enabling groups to tailor their plans to meet their specific needs.

The product consists of a core plan, to which modular options can then be added. Each modular cover will have up to four pre-defined limits for customers to choose from.

Core cover includes:

- Inpatient and day patient treatment;
- Outpatient surgery;
- CT/MRI/PET scans;
- Treatment of chronic conditions (including kidney dialysis);
- Cancer treatment;
- Inpatient psychiatric treatment;
- Emergency evacuation and repatriation; and Access to Virtual Care services (Virtual Doctor, Mind Health and Second Medical Opinion).

Optional modules:

- Outpatient
 - Specialist consultations and diagnostic tests;
 - o Outpatient therapies e.g. physiotherapist;
 - Complementary practitioner charges;
- Drugs & dressings;
- Pregnancy and childbirth cover;
- Assisted Fertility (for group sizes of 10 or over);
- Health checks (including cancer screening);
- Optical cover; and
- Dental treatment

Underwriting methods available:

- Full Medical Underwriting (FMU)
 - For employees and other eligible members to be fully underwritten they must declare their previous medical history
 - Exclusions may apply based on the employee or other eligible members' previous medical history
- Medical History Disregarded (MHD) (for group sizes of 5 or over)
 - This option, which is the most expensive, allows employees and other eligible members to be enrolled without any exclusions relating to their previous medical history.
- Continuation of Medical Underwriting Exclusions (CME)
 - This option is available to groups transferring from a fully medically underwritten policy with another insurer.
 - o Employees or other eligible members will keep the same underwriting terms they had with the previous insurer.

SMEs can also tailor benefits to meet their needs and goals by making changes to how the plan responds in the event of a claim by choosing from a range of excess options. A higher excess may result in a reduction in the premium paid by the SME, however the SME will need to carefully consider the impact a higher excess may have on its employees and other eligible members, and their ability to make a claim.

How complex is the product – will the target market be able to understand what they are buying?

Whilst international private health insurance cover options may be more extensive than General Insurance products and domestic health plans, we do not consider the products to be too complex for the target market to understand what they are buying.

The products are broadly comparable to our competitors, allowing existing and potential customers to shop around, compare benefits and select the most appropriate product to meet their health and wellbeing needs.

AXA – Global Healthcare distributed products are regularly assessed to ensure that customers understand what they have purchased, are able to claim when they need to and receive fair outcomes.

Our product literature is designed to help the target market to make informed decisions to meet their international private health insurance needs and goals. Product literature is also available in alternative formats where required to meet customer needs.

Are there any additional costs that may be borne by the customer?

The premium quoted by AXA Global Healthcare (UK) Limited is the total price paid by the group to AXA Global Healthcare (UK) Limited.

If a member receives eligible treatment at a cost that exceeds the limits that apply to their policy the member will be required to pay the outstanding balance.

Our products are intended to provide fair value inclusive of the commission paid to intermediaries. It is assumed that the premium quoted by intermediaries will be the total price paid by the organisation and not include additional fees. If intermediaries charge additional fees, then they must take this into account when considering the value of the product to the customer.

There are no other additional premium costs or servicing fees to be paid by the customer to AXA Global Healthcare (UK) Limited.

What is the distribution strategy and why is it appropriate for the target market?

The distribution strategy is considered appropriate for the target market with products available to purchase direct from AXA Global Healthcare (UK) Limited or an international private health insurance specialist intermediary of their choice.

These products are considered suitable for advised and non-advised sales by suitably skilled agents via telephone or face to face.

The different methods to purchase cover reflect the differing characteristics and preferences of our customers. These characteristics will be influenced by the customer's understanding of the product, digital literacy as well as

| | personal or cultural preferences. Some customers will be more comfortable researching themselves before purchasing whereas others might prefer to discuss cover with an agent or intermediary before purchasing. |
|----------------------------------|--|
| | AXA – Global Healthcare's product governance procedures will help to identify if the product is reaching customers outside the intended target market. The risk is considered low but if it does happen, AXA – Global Healthcare will investigate to establish the root cause, establish if any customer detriment has been caused and take appropriate remedial action. |
| Additional Product Literature | This document is to be read in conjunction with the appropriate Group Insurance Contract and Policy Handbook published by AXA – Global Healthcare. Please contact your AXA representative for a copy of these documents. |

Target market statement

| Product name | Islands Health Adapt |
|----------------------------------|--|
| Product type | International private medical insurance |
| Product status | This product is open to new business |
| Who is the product designed for? | This product is designed to provide group international private healthcare cover for employees, directors or other nominated people associated with an active trading company. The product would therefore appeal to a target SME market which has: • a legal status that allows them to contract with AXA Global |
| | Healthcare (UK) Limited on a group insurance basis; |
| | a group size of 2 to approximately 74 lead members; |
| | the financial resources to pay for international private healthcare for its employees and other eligible members; |
| | an interest in proactively investing in the health and wellbeing of their employees and other eligible members; |
| | a desire to provide access to international private medical treatment of illnesses, diseases or injuries that arise after they join the policy to support a return to health and work quickly to minimise the impact for both the individual and the organisation; an interest in being able to provide access to medical treatment within the Channel Islands, the Isle of Man as well as the United Kingdom and Europe for their employees and other eligible members; an interest in being able to access medical treatment that might not be available locally due to limited healthcare facilities or medical capabilities available on the island(s); and a need to provide private medical cover as part of a competitive rewards package to attract new recruits and retain existing employees. |
| | The product is designed to provide group cover to employees and other eligible members based in the Channel Islands and Isle of Man. There is a lower age limit of 16 for employees. There is no minimum age for dependants. The maximum age for all eligible members is 80 at the point of joining the policy. |
| | The product is designed to: meet the needs of a broad spectrum of potential requirements by offering a range of plan levels, optional benefits and underwriting methods; be priced with reference to the lead member and eligible members ages; extend to include a partner of the lead member, dependent children of the lead member or partner's children and adopted children; and |
| | provide cover options to the groups for employees, directors and other associated individuals, at the discretion of the group secretary and as agreed with AXA Global Healthcare (UK) Limited. |

Who is the product not designed for?

This product is not designed for:

- SMEs that do not have a legal status that allows them to contract with AXA Global Healthcare (UK) Limited on a group insurance basis;
- SMEs that are looking to cover employees and other eligible members who don't reside in the Channel Islands or Isle of Man;
- SMEs with employees or other eligible members who require cover for treatment as a result of training or taking part in any sport for which they are paid, receiving a grant or bursary or competing for prize money; or
- where individuals covered under the product fund their own costs of cover outside of a salary sacrifice arrangement with their employer.

Before choosing this product, SMEs will need to ensure that their employees and other eligible members have easy access to the specialists and / or hospital locations included. Aside from this, there are generally no SMEs who would not benefit from this product.

What are the main product features that will be compatible with the health and wellbeing needs, characteristics and goals of the target market?

This comprehensive private health insurance product provides employees and other eligible members with access to a range of services for eligible conditions, diagnostics and treatments.

A fully comprehensive private health insurance product may be out of reach for some SMEs, so Islands Health Adapt's modular structure provides flexibility, enabling groups to tailor their plans to meet their specific needs.

The product consists of a core plan, to which modular options can then be added. Each modular cover will have up to four pre-defined limits for customers to choose from.

Core cover includes:

- Inpatient and day patient treatment;
- Outpatient surgery;
- CT/MRI/PET scans;
- Treatment of chronic conditions
- Cancer treatment;
- Psychiatric treatment (as in patient or outpatient);
- Access to hospitals within the islands, United Kingdom (including greater London) and Europe;
- Transportation to another island or the United Kingdom when medical treatment is not available locally;
- Emergency evacuation and repatriation; and
- Access to Virtual Care services (Virtual Doctor, Mind Health and Second Medical Opinion).

Optional modules:

- Outpatient (including):
 - Specialist consultations and diagnostic tests;
 - Outpatient therapies, e.g. physiotherapist;
 - Complementary practitioner charges;
- Private GP services;

- Drugs & Dressings
- Dental treatments;
- Optical cover; and
- Health checks (including cancer screening)

Underwriting methods available:

- Full Medical Underwriting (FMU)
 - For employees and other eligible members to be fully underwritten they must declare their previous medical history
 - Exclusions may apply based on the employee or other eligible members' previous medical history.
- Medical History Disregarded (MHD) (for group sizes of 10 or over)
 - This option, which is the most expensive, allows employees and other eligible members to be enrolled without any exclusions relating to their previous medical history.
- Continuation of Medical Underwriting Exclusions (CME)
 - This option is available to groups transferring from a fully medically underwritten policy with another insurer.
 - Employees or other eligible members will keep the same underwriting terms they had with the previous insurer.
- Moratorium
 - Any pre-existing conditions are excluded from cover for an agreed period of time.
 - Cover for any excluded conditions may be re-instated if a 'trouble free period' takes place.

SMEs can also tailor benefits to meet their needs and goals by making changes to how the plan responds in the event of a claim by choosing from a range of excess options.

A higher excess may result in a reduction in the premium paid by the SME, however the SME will need to carefully consider the impact a higher excess may have on its employees and other eligible members, and their ability to make a claim.

How complex is the product – will the target market be able to understand what they are buying?

Whilst international private health insurance cover may be more extensive than General Insurance products and domestic health plans, we do not consider the products to be too complex for the target market to understand what they are buying.

The product is broadly comparable to our competitors, allowing existing and potential customers to shop around, compare benefits and select the most appropriate product to meet their health and wellbeing needs.

AXA Global Healthcare (UK) Limited distributed products are regularly assessed to ensure that customers understand what they have purchased, are able to claim when they need to and receive fair outcomes.

Our product literature is designed to help the target market to make informed decisions to meet their international private health insurance needs and goals. Product literature is also available in alternative formats where required to meet customer needs.

Are there any additional costs that may be borne by the customer?

The premium quoted by AXA Global Healthcare (UK) Limited is the total price paid by the SME to AXA Global Healthcare (UK) Limited.

If a member receives eligible treatment at a cost that exceeds the limits that apply to their policy the member will be required to pay the outstanding balance.

Our products are intended to provide fair value inclusive of the commission paid to intermediaries. It is assumed that the premium quoted by intermediaries will be the total price paid by the customer and not include additional fees. If intermediaries charge additional fees, then they must take this into account when considering the value of the product to the customer.

There are no other additional premium costs or servicing fees to be paid by the customer to AXA – Global Healthcare.

What is the distribution strategy and why is it appropriate for the target market?

The distribution strategy is considered appropriate for the target market with products available to purchase direct from AXA – Global Healthcare or a private health insurance specialist intermediary of their choice.

These products are considered suitable for advised and non-advised sales by suitably skilled agents via telephone or face to face.

The different methods to purchase cover reflect the differing characteristics and preferences of our customers. These characteristics will be influenced by the customers' understanding of the product, digital literacy as well as personal or cultural preferences. Some customers will be more comfortable researching themselves before purchasing whereas others might prefer to discuss cover with an agent or intermediary before purchasing.

AXA – Global Healthcare's product governance procedures will help to identify if the product is reaching customers outside the intended target market. The risk is considered low but if it does happen, AXA – Global Healthcare will investigate to establish the root cause, establish if any customer detriment has been caused and take appropriate remedial action.

Additional Product Literature

This document is to be read in conjunction with the appropriate Group Insurance Contract and Policy Handbook published by AXA – Global Healthcare. Please contact your AXA representative for a copy of these documents.

Product governance

How we design, monitor and review our products to ensure they continue to meet the needs, characteristics and objectives of the target market including any vulnerable and potentially vulnerable customers.

Understanding the needs of vulnerable and potentially vulnerable customers

AXA – Global Healthcare ensures the needs of vulnerable and potentially vulnerable customers are met by considering the nature and scale of the drivers of vulnerability present in the target market. We consider the impact of these vulnerabilities on customers' needs and consider how this will affect the customer experience, taking appropriate steps to help deliver fair customer outcomes.

Our frontline staff are trained to recognise and respond to indicators of vulnerability and to exercise additional care and support to customers when required. This support can include, but is not limited to referral to our 24/7 Health Support Team, signposting to relevant Charities, Payment Flexibility, giving extra time, large text, Braille, Translation Services etc.

Product development process

The product development process has been designed to ensure that we have a consistent approach to the development of new or significantly adapted products to avoid potential detriment to the customer.

The process comprises of the following 6 phases:



As part of our product approval process each project will be reviewed by our Product Governance Committees to ensure a consistent and balanced approach to product design with a focus on meeting the needs, characteristics and objectives of the target market and delivering fair customer outcomes.

Customer outcomes assessment and customer value procedures

The customer outcomes assessment process has been designed to regularly review our products for evidence of customer detriment, identify the root cause of any customer harm and consider if, when and how we need to take remedial action. These procedures include regular assessments to test that products provide fair value to the target market. Products are monitored on an ongoing basis throughout the product lifecycle and assessed against a set of Management Information metrics to analyse performance and ensure that they continue to meet the needs, characteristics and objectives of the target market and deliver fair outcomes.

Information from intermediaries and other distribution partners

As we carry out these reviews, we may request information from intermediaries to be able to evidence that our products are being distributed correctly. Examples of this could be evidence that the product has been sold to the right target market or complaints received relating to the product. In most instances we will hold this data already on our systems, but there may be occasions when we need to request it from relevant distribution partners.

Product approval process

We'll provide a copy of our product approval process to intermediaries at the launch of a new or significantly adapted product. This includes information regarding the target market, distribution channels and the monitoring of the product. This information will provide a clear overview of the product and the development activity that has taken place.

Products are underwritten by AXA PPP healthcare Limited and administered by AXA Global Healthcare (UK) Limited.

AXA PPP healthcare Limited is authorised by the Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority (FCA) and the Prudential Regulation Authority. Registered number 202947. AXA Global Healthcare (UK) Limited is authorised and regulated by the Financial Conduct Authority (FCA). Registered number 307140.

Registered Address for both: 20 Gracechurch Street, London, EC3V 0BG

Write to us at: AXA – Global Healthcare, International House, Crescent Road, Tunbridge Wells, Kent TN1 2PL. We may record and/or monitor calls for quality assurance, training and as a record of our conversation. For information about AXA – Global Healthcare, visit axaglobalhealthcare.com/en/about-us/.

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