Product Governance and Fair Value Assessment

Camberford Underwriting is committed to conducting its business in a fair, honest and open manner and we ensure that we have appropriate product oversight and governance systems and controls in place to offer products that have been assessed as providing fair value to customers that are within the appropriate target market.

This summary document has been created to fulfil our responsibilities under fair value regulations. This document should not be used as a sales or marketing tool. The customer facing broker must act in the best interests of each customer individually when deciding whether to recommend a particular policy or not.

Product Information

Product	Non Standard Real Estate
Version Number	CRF/0126/PW
Review Period	2026 - 2027

Assessment

Most Recent Review	July 2026
Manufacturer / Co-manufacturer	Camberford Underwriting Capacity; **Section A-D and Section E (Part A)** AXA Insurance UK Plc – 50% Hiscox – 30% MSIG Europe SE - 20% **Section E (Part B)** Convex Insurance UK Limited – 100% **Section F** ARAG plc on behalf of the Insurer ARAG Legal Expenses Insurance Company
Territorial Limits	For properties located within Great Britain, Northern Ireland, the Channel Islands and the Isle of Man.
Target Market	This product is intended for commercial customers who require insurance protection for non-standard real estate risks. The target market includes property owners, landlords, managing agents, property investors, and portfolio owners with residential, commercial, or mixed-use properties that may fall outside the acceptance criteria of standard property insurance products. The target market includes: • Commercial property owners; • Professional and private landlords; • Managing agents acting on behalf of property owners; • Property investors; • Owners of residential, commercial, and mixed-use portfolios; • Owners of blocks of flats; • Corporate entities, trusts, partnerships, and other organisations with an insurable interest in property assets; and • Customers who access and purchase insurance through an authorised insurance broker. It is designed for customers whose circumstances or property exposures require specialist consideration and tailored insurance arrangements. The product offers access to non-standard real estate insurance solutions for customers who would benefit from a flexible underwriting approach and the expertise of a specialist non-standard real estate insurer.

<table>
<tr><td></td><td>The product is particularly suited to broker-intermediated risks where flexibility and tailored cover is required. It is intended for customers seeking protection for non-standard investment properties and income-generating real estate assets across a range of sectors, including residential, commercial, industrial, leisure, hospitality, and accommodation risks whose insurance needs are not adequately met by standard market real estate products, including but not limited to risks with;

Non standard occupancy
Irregular occupancy
Short or long term unoccupancy
Non-direct lease arrangement
Type or presence of premises

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<tr><td>Outside Target Market</td><td>While the product is suitable for a broad range of commercial property owners, it may be less appropriate for customers who are;

Non-commercial customers
Seeking insurance for their main private residence
Requiring protection for standard real estate properties
The property has characteristics that fall outside our non-standard underwriting appetite, such as:

Heavy industrial or high risk commercial properties
Large manufacturing or warehousing risks (>£5 million TSI)
Care homes for elderly, special needs, drug/alcohol/mental health, youths
Nightclubs/adult entertainment (unless part of a standard portfolio of properties)
Dry cleaners / Laundrettes (unless part of a standard portfolio of properties)
Education risks (schools, colleges, training facilities)
Property in a high flood risk area/with a previous flood claim
Property with recent of ongoing subsidence claims / problems

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<tr><td>Characteristics of the product aimed at meeting the needs of the target market</td><td>Cover Sections:
Section A – Material Damage
Section B – Loss of Rent
Section C – Property Owners' Liability
Section D – Employers' Liability (Optional)
Section E – Terrorism Part A (Pool Re) (Optional)
Section E – Terrorism Part B (Non-Pool Re) (Optional)
Section F – Commercial Property Owners' Legal Expenses (Optional)

Key Cover Inclusions:
Material Damage:

All risks covering damage not otherwise excluded
Landlords' contents automatically covered up to £25,000
Contract works covered up to £100,000

Loss of Rent/Alternative Accommodation:

20% of the sum(s) insured on the damaged building in addition to the buildings sum(s) insured that has been damaged for a maximum period of 36 months.
Commercial loss of rent based on declared value - choose from 12, 24 or 36 month indemnity period

Property Owners Liability:

£10,000,000 limit of indemnity as standard
Managing agent indemnity available via an optional extension
Includes £250,000 cover for advertising liability
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	Key Cover Inclusions: • Buildings not considered unoccupied (which is not occupied or used) until 30 consecutive days have passed. • Unauthorised use of Electricity, Gas and Water. • Loss Minimisation Costs & Prevention Expenditure (costs to prevent or minimise damage). • Eviction of squatters. • Illegal Cultivation of Drugs (clean-up costs and remedial works if the premises have been used to manufacture illegal substances). • Removal of Vermin. • Loss of Investment Value. • Loss of Market Value. • Increased Cost of Working (expenses to prevent or limit a reduction in rent). **Key Cover Exclusions:** • Any loss to damage as noted under the 'General Exclusions' • In respect of damage caused by malicious persons and acts of vandalism and theft or attempted theft we will not pay for any damage caused by any resident to the block of flats, maisonette, or private dwelling house in which the resident resides, which can be recovered from any security deposit lodged by the resident. • In respect of an escape of water we will not cover discharge or leaking from any automatic sprinkler installation. • In respect of subsidence, ground heave or landslip damage we will not cover such damage to residential garages unless there is subsidence, ground heave or landslip damage occurring to the main residential building at the same time. • Faulty or defective workmanship • Any loss or damage due to wear & tear, gradual deterioration and/or lack of maintenance except for subsequent damage which itself results from a defined peril covered by Section A – Material Damage and Section B – Loss of Rent. • Cyber Acts or incidents • Under Section C – Property Owners' Liability we will not cover bodily injury to an employee. **Key Restrictions** • Under Section C - Property Owners' Liability we will not pay more than £2,000,000 for any damages payable for all occurrences which arise either directly or indirectly in connection with a terrorist act. • Under Section D – Employers' Liability we will not pay more than £5,000,000 for any one claim or series of claims by one or more employees, in connection either directly or indirectly with a terrorist act.
Distribution Strategy	This product is designed for distribution through FCA-authorised insurance intermediaries with appropriate knowledge of Property Owners insurance. Distributors should ensure customers fall within the target market, cover meets demands and needs, fees do not adversely affect value, and customer outcomes remain consistent with Consumer Duty requirements. Brokers must be approved by us and enter into our standard format TOBA. Our preferred method of agreeing TOBAs is via REG. Brokers may access this product via our online portal. Sub-broking is not permitted without our express written consent Customers whose risks are smaller and less complex are better suited to the Company's e-traded (Acturis) product offering
Commission	We will agree a commission rate with each distributor. All distributors should be able to demonstrate that commission received bears a reasonable relationship to the actual costs of their contribution/level of involvement or benefit added by them to the distribution arrangement. We may ask you to justify your commission rate and if we are not satisfied that it is appropriate, we may seek to amend it.
Other Renumeration	We will charge an Underwriting Fee on any new business or renewal policy taken up. Full details regarding our fees can be found within the quote and issue cover

	Schedule Statement of Fact. We review our fees annually to ensure that they remain appropriate. We may ask you provide details of other renumeration you earn in connection with the sale of our policy. This includes any fees, premium finance earnings, earning from non-insurance products or add-ons sold alongside our policy. You must ensure that your arrangements are consistent with FCA rules on conflicts and incentives. You should review all remuneration arrangements at least annually and share the outcome of that review with us on request.
Fair Value Review	Our product governance process requires a full review of all products at least annually to determine if the product offers fair value to the end customer, including leaseholders. These reviews consider the target market, distribution strategy, remuneration, marketing, product information, product performance, product design and feedback from distributors and customers. We also monitor conversion rates, renewal retention, cancellations, loss ratios, claims and complaints as part of this review process. We are satisfied that the product offers fair value to its intended Target Market subject to distributors: • not charging customers additional amounts over and above the gross premium plus • underwriting fees quoted by us without first determining that they do not have a detrimental effect on the value of the product. Ensuring that no duplicate cover exists or is caused by an add-on where that cover is already provided by the policy.
Customers for whom this product is not suitable	This product would not be expected to provide fair value to policyholders/risks that fall outside the Target Market.

Providing Feedback and Product Training

We welcome any feedback from our distributors on the performance of our products. All feedback will be considered in our next product review.

If you believe that your staff would benefit from additional training on this product, please let us know.