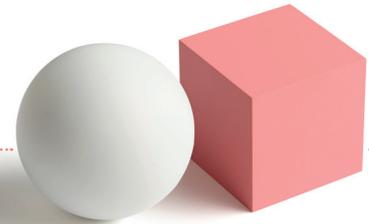


INSURANCE DISTRIBUTION DIRECTIVE INFORMATION

PRODUCT OVERSIGHT AND GOVERNANCE



Introduction

Just has a well-established product oversight and governance framework in place to oversee how we design, monitor and review our products. We have robust processes which ensure our propositions are fit for purpose, designed to meet the needs of our intended target market, and are distributed appropriately. In line with more recent regulatory changes, we have made further enhancements to our framework.

We govern the launching of new products, or any material changes to our existing products through our product development process. We then regularly review our products and services to check that they remain suitable for our target market and continue to operate in line with customer expectations.

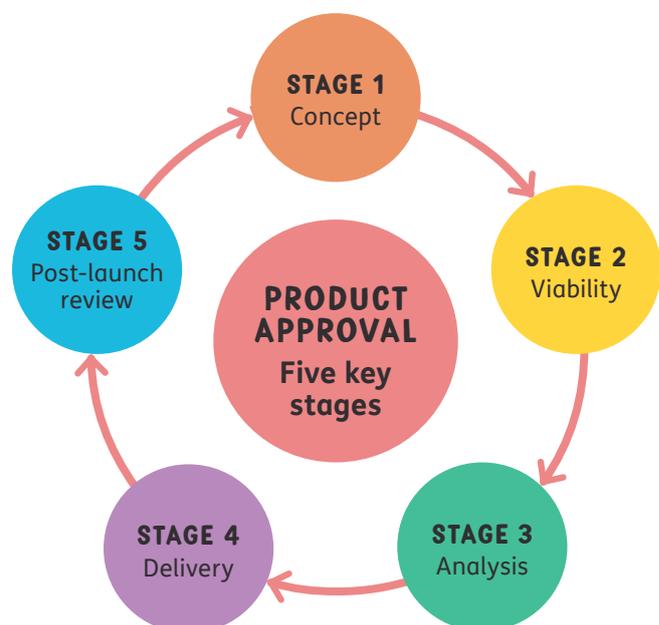
Our product oversight and governance ensures new products and significant product changes receive formal approval before they are made available and that:

- products are developed to meet an identified customer need and deliver appropriate customer outcomes
- any differentiated needs or support customers with vulnerability may require are appropriately considered
- we clearly define our target market and who the product is not suitable for
- our products are offered through appropriate distribution channels
- new products and services are appropriately tested before they are made available
- our existing products continue to meet the needs of customers and provide fair value, and
- any identified risks and issues are evaluated, prioritised and acted upon.

Proposition approval process

Our 5-stage process is overseen by a committee of senior leaders from across Just's business, including Proposition, Risk, Legal and Compliance, as well as commercial functions. The approval process has been designed so that we are:

- fully compliant with regulation and legislation
- aligned with the Just Risk Policy
- flexible in approach, and
- customer centric.



Product review process

The product review process has been designed to ensure that we assess our products against a range of factors and metrics, to check for any potential or actual customer harm, and to ensure we have the necessary controls in place to know when we need to take remedial action.

2 PRODUCT OVERSIGHT AND GOVERNANCE

When reviewing we consider:

- whether the product remains appropriate to our identified target market and whether customers are using it as we intended
- whether we continue to deliver good customer experience and outcomes for all customers including customers with characteristics of vulnerability
- if any customers have experienced any poor outcomes from the product and determining how we can address this
- the ongoing value for money customers receive from the product
- whether our distribution model is targeting customers appropriately and to customers within our target market
- whether customers experience a good customer journey with appropriate customer literature and support, and
- feedback and reviews from our customers and carefully evaluate and respond to any complaints.

Importantly, we act if we identify any areas of concern which may lead to poor customer outcomes or potential harm.

Information we may need from distributors

To support us deliver good customer outcomes from our products and services we may ask for information from you to support the review our products and services.

The type of information that may be requested is shown below.

- Details of your business model.
- Information regarding your distribution arrangements and whether remedial action has been required in the intervening period.
- Whether any issues were identified by you in relation to your target market assessment.

- Whether any issues have been identified by, or for, customers with characteristics of vulnerability, and what they were.
- Whether any sales outside the target market have been identified because of your own review, and how they were considered outside of the target market and whether there is risk of foreseeable harm.
- Your advice principles and process.
- How you ensure that all product features and benefits are fully explained to customers.
- How you recognise and respond to customers who may be in vulnerable circumstances or have different or additional needs.
- How you make sure that our products are being recommended to customers within our published target market statements.
- Information on how our products are meeting customers' needs both at the point of sale and throughout the customers' lifecycle.
- How you manage any conflicts of interest and behavioural bias.
- Your remuneration strategy including details of any sales incentive schemes you may operate linked to our products.
- Details of your advice charges and any other charges that you may apply.
- Information on customer cancellations, reasons for cancellation and reasons for complaints in relation to our products.

Importantly, please contact us as soon as possible where you have identified or feel there is a risk of foreseeable consumer harm. If we identify issues within our reviews, we will take appropriate action to mitigate and prevent any customer harm. Where appropriate we will look to share our actions with you.

FOR MORE INFORMATION

Call: **0345 302 2287**

Lines are open Monday to Friday, 8.30am to 5.30pm

Calls may be monitored and recorded, and call charges may apply.

Email: support@wearejust.co.uk

Or visit our website for further information: [justadviser.com](https://www.justadviser.com)

To see our Solvency and Financial Condition Report, please visit:

[justgroupplc.co.uk/investors/results-and-presentations/regulatory-returns](https://www.justgroupplc.co.uk/investors/results-and-presentations/regulatory-returns)

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January 2024

 **FT ADVISER**

