

## Keystone Underwriting Pty Ltd Product Development and Distribution Policy

Keystone Underwriting Pty Ltd aims to provide products that are consistent with the likely objectives, financial situation and needs of customers in the target market. To do this, we put the customer at the centre of all stages of the product lifecycle – from when we first design and develop a new product to when we decide to end or decommission a product. This is reflected in how we train our people and in our systems and policies. We have in place Target Market Determinations which guide the distribution of our products for appropriate target markets.

### Product Lifecycle Stage

**1. Design.** The Stage in which a new product is devised.

We typically start by assessing the likely objectives, financial situation and needs of a class of consumers and develop a market proposition for the new product leveraging (e.g. customer research and insights, experience and expertise, industry data/insights and other metrics.) Then, we consider the distribution channel and identify what controls need to be in place to support distribution of the product within the target market.

**2. Delivery.** The Stage in which a product has been designed or modified is prepared ready for distribution.

This stage involves a number of steps which may include:

- preparation of clear, concise and effective disclosure documents.
- testing of the new product is completed to ensure it is operating as intended and in a manner that is aligned to the likely objectives, financial and needs of the target market.
- training of staff and review of systems and processes to support distribution of the new product within target product.

**3. Review.** The Stage in which a product is reviewed to ensure it is operating as designed.

We undertake regular product reviews to assess whether the product is operating the way it was designed, that it continues to meet customer needs and that it is being distributed within target market. Data such as complaints and other claims data and feedback are leveraged as part of the review stage.

**4. Enhance/Modify.** The Stage in which changes are made to an existing product to align with business requirements/ industry or customer needs & expectations.

Depending on the outcome of the Review stage, a possible outcome may be to amend the design of the product or the method of distribution. There may also be other reasons the Enhance/Modify stage is triggered. e.g. to meet regulatory change requirements. In either case, the Enhance/Modify stage broadly follows the same steps outlined in the Design and Delivery stages.

**5. Decommission.** The Stage in which a product comes to an end and is no longer available.

A further potential outcome of the Review stage is the potential decommission of a product. This might occur if the product is not delivering the expected customer value, if for commercial or other reasons we decide to withdraw the product or if we cannot reasonably conclude the product is being distributed within the target market.