

# TARGET MARKET DETERMINATION (TMD): ENCOMPASS PROTECTION



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## Legal disclaimer

This Target Market Determination (TMD) is required under section 994B of the *Corporations Act 2001* (Cth). It sets out the target market for the product, triggers to review the target market and certain other information. It forms part of MLC Limited's and NEOS Life's design and distribution framework for the product.

This document is **not** a product disclosure statement and is **not** a summary of the product features or terms of the product. This document does not take into account any person's individual objectives, financial situation or needs. Persons interested in acquiring this product should carefully read the product disclosure statement before making a decision whether to buy this product.

MLC Limited uses the MLC brand under licence. MLC Limited is part of the Nippon Life Insurance Group and is not part of the Insignia Financial Group. MLC Limited ABN 90 000 000 402 AFSL 230694 (MLC Life Insurance).

NEOS Life is a registered business name of Australian Life Development Pty. Ltd. ABN 96 617 129 914 AFSL 502759.

## Target market

### 1. Likely objectives of consumers in the target market\*

Life Cover	Total and Permanent Disability (TPD) Cover	Critical Illness Cover	Income Protection Cover
The consumer wants to reduce their exposure where they have (or envisage that in the future they will or may have) outstanding financial or financial-in-kind commitments and (for life cover) financial commitments of dependents or the Estate that will not be satisfied in the event/s listed below.			The consumer wants to reduce their exposure where they have (or envisages that in future they will or may have) a need to replace their income if they are unable to earn income (or are only able to earn a lower income) due to sickness or injury.
The insured person's: <ul style="list-style-type: none"><li>• Death</li><li>• Terminal Illness</li></ul>	The insured person is incapable of engaging in: <ul style="list-style-type: none"><li>• meaningful gainful employment, or</li><li>• independent living</li></ul> due to total and permanent disability.	The insured person suffers a specified critical illness.	

The target market excludes those:

- Contemplating self-harm.
- Who are not:
  - an Australian or New Zealand citizen,
  - an Australian permanent resident, or
  - a holder of a skilled working visa under a business sponsorship such as a sub-class 482 working visa or similar.

For Encompass Protection cover within superannuation, an individual is in the target market for life insurance within the super environment if they accept that there are legislative restrictions that impact the insurance cover, including:

- the insurance premiums must be paid from a super fund or by making a contribution to a super account
- any insurance claim will be paid via the trustee of the super fund, who must also approve payment of the benefit
- if the consumer dies and has not made a valid binding death beneficiary nomination, the trustee of the super fund may determine the beneficiary or beneficiaries who will receive the death benefit
- the qualifying definitions under which an insurance claim can be paid must be consistent with legislated superannuation rules called 'conditions of release'
- the legislated 'conditions of release' must be satisfied before benefits, including an insurance claim, can be paid to the member, and
- taxation may apply to benefit payments paid to the member or beneficiary.

## 2. Likely financial situation of consumers in the target market\*

As the premiums may vary from time to time (in accordance with the chosen premium structure), the consumer should have the financial capacity to pay the premiums over the period they intend to hold the product.

The potential relevant sources of financial capacity (consumer must have at least one) are:

- Is earning income
- Has personal savings
- Has superannuation; or
- Otherwise has financial capacity to pay premiums.

## 3. Demographic and eligibility requirements of consumers in the target market\*

Requirements	Life Cover	Total and Permanent Disability Cover	Critical Illness Cover	Income Protection Cover
Encompass Protection Entry age	Stepped: 18-70 Level: 18-60	18-60	18-60	18-60
Australian permanent resident	✓	✓	✓	✓
Gainfully employed	-	✓ (Cover may be available for Home Duties if unemployed at the time of application)	-	✓

\* A consumer, who previously held Encompass Protection cover that lapsed due to non-payment of premium, and who has applied to have their policy reinstated within six months of the lapsation and has satisfied MLC Life Insurance's reinstatement requirements, will still be within the target market, irrespective of whether they otherwise fall within the target market described above.

# Product description

Cover types	Type of claim payment		Ownership
<b>Encompass Protection offers cover for events listed below, in accordance with the terms and conditions outlined in the Encompass Protection Product Disclosure Statement and Policy Document (PDS).</b>	Lump sum	Monthly payment/s	Available under Encompass Protection (Super)
Life Cover – In the event the insured person: <ul style="list-style-type: none"> <li>• dies; or</li> <li>• is diagnosed with a terminal illness.</li> </ul>	✓	-	✓
Total and Permanent Disability Cover – In the event the insured person: <ul style="list-style-type: none"> <li>• suffers a permanent disability, meaning they cannot work again in their usual occupation, or any other occupation they are reasonably suited to (depending on whether own occupation, any occupation or super TPD is chosen); or</li> <li>• suffers either a permanent cognitive deficit, a specified loss of use or for those performing home duties, a permanent inability to perform specified Domestic Duties</li> </ul> Note: For Encompass Protection within super in all cases, the insured person must also be permanently incapacitated (as required by SIS) and meet all other terms and conditions outlined in the PDS.	✓	-	✓
Critical Illness Cover – In the event the insured person: <ul style="list-style-type: none"> <li>• is diagnosed with or suffers a specified critical illness (specified terms).</li> </ul>	✓	-	-
Income Protection Cover – In the event the insured person is: <ul style="list-style-type: none"> <li>• unable to work due to illness or injury; or</li> <li>• partially restricted in performing their duties and suffering a reduction in income due to illness or injury.</li> </ul> Note: For Encompass Protection within super in all cases, the insured person must also have satisfied a period of temporary incapacity and meet all other terms and conditions outlined in the PDS.	-	✓	✓

Key product attributes		Life Cover	Total and Permanent Disability Cover	Critical Illness Cover	Income Protection Cover
Available via super environment		✓	✓	-	✓
Premium structure – premiums can change over time for both level and stepped premium options					
Stepped premiums are based on your age and will usually increase each year as you get older. Level premiums are designed to spread the costs of the premiums over the life of the policy. Premiums are higher in the early years and lower in later years compared to stepped premiums which increase as you get older.		✓	✓	✓	✓
The payment of premiums – if premiums are not paid when due, the policy may lapse, in which case the policy owner would no longer be covered and cannot make a claim.					
Premium payment frequency and method provides the consumer the:					
<ul style="list-style-type: none"> <li>• ability to pay premiums on a monthly, or yearly basis, and</li> <li>• ability to pay premiums via direct debit or credit card.</li> </ul>		✓	✓	✓	✓
The product provides insurance benefits only and does not provide for any accumulation of savings.					
Eligibility criteria – certain persons may be ineligible for cover if they do not meet the eligibility criteria for this product. Eligibility criteria of the life to be insured could include:					
<ul style="list-style-type: none"> <li>• age</li> <li>• employment status</li> <li>• residency status; and</li> <li>• health status.</li> </ul>		✓	✓	✓	✓
There are standard exclusions including but not limited to:	Suicide exclusion for death or terminal illness in the first 13 months of policy start, reinstatement or increase.	✓	-	-	-
	Self-inflicted injury or attempted suicide.	-	✓	✓	✓
	War or war-like operations	-	-	-	✓
	90-day exclusion/qualifying periods for certain critical conditions.	-	-	✓	-
	Normal and uncomplicated pregnancy or childbirth.	-	-	-	✓
	Claims arising directly or indirectly from committing, or attempting to commit a criminal act where; a conviction is recorded, and a term of imprisonment is being, or has been, served.	-	-	-	✓
There are ancillary and/or customisable benefits.		✓	✓	✓	✓
Underwriting process – could also impact the price of the product, the sum insured, and the terms and conditions of the insurance policy.		✓	✓	✓	✓

## Why the product attributes will make it more likely that the consumers who acquire the product are in the target market

### Life benefit

Broadly, the target market comprises those who have or expect to have outstanding financial commitments that will not be satisfied in the event of their own or another person's (i.e. the insured person's) death or terminal illness and who have the capacity to pay potentially variable premiums on an ongoing basis. As the product pays a lump sum on death or terminal illness it is therefore likely to meet the needs, or go towards meeting the needs, of those in the target market.

### Total and Permanent Disablement benefit

Broadly, the target market comprises those who have or expect to have outstanding financial commitments that will not be satisfied in the event of their own or another person's (i.e. the insured person's) permanent disability, and who have the capacity to pay potentially variable premiums on an ongoing basis. As the product pays a lump sum on permanent disability it is therefore likely to meet the needs, or go towards meeting the needs, of those in the target market.

### Critical Illness benefit

Broadly, the target market comprises those who have or expect to have outstanding financial commitments that will not be satisfied if they or another person (i.e. the insured person) suffer a critical illness, and who have the capacity to pay potentially variable premiums on an ongoing basis. As the product pays a lump sum on the insured person suffering a critical illness, it is therefore likely to meet the needs, or go towards meeting the needs, of those in the target market.

### Income Protection benefit

Broadly, the target market comprises those who have or expect to have outstanding financial commitments that will not be satisfied in the event of their own (i.e. the insured person's) sickness, illness or accident and who have the capacity to pay potentially variable premiums on an ongoing basis. As the product pays a periodical monthly benefit while disabled, it is therefore likely to meet the needs, or go towards meeting the needs, of those in the target market.

## Distribution conditions

### For distribution via personal advice

Application for cover must be submitted by a suitably authorised financial adviser (i.e. authorised in life risk products and/or super), operating under an appropriate AFSL who has accepted the NEOS Life Distribution Agreement and has attained a licensee code and adviser code.

### For distribution via general advice

- Distributor must not sell to a customer who does not satisfy the demographic factors and eligibility requirements in the Target Market as set out above
- Distributor must provide the customer with the PDS
- Distributor has structured training and/or quality assurance standards
- The customer meets application screening questions
- Application for cover must be submitted via an appropriate AFSL, with appropriate authorisation, who has accepted NEOS Life Distribution Agreement and has attained a licensee and adviser code; and
- From time to time, the product may be distributed under a general advice model in compliance with the distributor's authorised call scripts and processes.

## Why these distribution conditions and restrictions will make it more likely that the consumers who acquire the product are in the target market

### For distribution via personal advice

Consumers that obtain personal advice from a qualified financial adviser are more likely to acquire an appropriate product and be in the target market because advisers have a duty to act in their best interest when providing personal advice.

### For distribution via general advice

Consumers of life insurance are more likely to be in the target market if distributors:

- refrain from selling to customers that do not meet the relevant demographic and eligibility requirements; and
- provide customers with a PDS.

# Review triggers and information to assess whether a review trigger has occurred

Review Triggers	Assessment information	Timeframe	Who is responsible
1 The commencement of a significant change in law that materially affects the product design or distribution of the product or class of products that includes this product. Note: This trigger is a mandatory review. The product issuer may choose to undertake a review even if the above review trigger is not met.	Any relevant regulation, legislation and/or ASIC instruments relating to the change in law.	As new changes are introduced.	MLC Life Insurance with information supplied.
2 Product performance is materially inconsistent with the product issuer's expectations, having regard to: a. product claim ratios; b. the number of paid, denied and withdrawn claims; c. the number of policies sold; and d. policy lapse rates.	During the review period, the expected and actual: a. claims ratio; b. number of paid, declined and withdrawn claims; c. number of policies sold; d. number of policies lapsed.	Aligned to TMD Review Period.	MLC Life Insurance.
3 Significant or unexpectedly high number of complaints regarding product design, product availability, claims and distribution condition that would reasonably suggest that the TMD is no longer appropriate.	Complaints (as defined in section 994A(1) of the Act) and the nature of the complaints regarding product design, product availability, claims and distribution condition.	As soon as practicable, or in any event, within 10 business days after the end of the reporting period.	MLC Life Insurance and our Distribution Partners.
4 Material change to key product design, features, and/or fees that would reasonably suggest that this TMD is no longer appropriate.	Notification of proposed material change to key product design, features, and/or fees.	As material changes are made.	MLC Life Insurance.
5 Significant Dealing in the product which the regulated person becomes aware is not consistent with the TMD.	A dealing in the product which the distributor (as the regulated person) becomes aware is not consistent with this TMD.	As a significant dealing is identified.	MLC Life Insurance and our Distribution Partners.

## TMD review periods

### The maximum initial period before this TMD is reviewed (initial review period)

Subject to intervening review triggers, no more than 12 months from the date of this TMD.

### The maximum period before this TMD is reviewed (after initial review period)

Subject to intervening review triggers, no more than three years after the end of the previous review.

## Distributor reporting requirements

- Complaints and the nature of the complaints regarding product design, product availability, claims and distribution condition. Complaints must be reported as soon as practicable, or in any event, within 10 business days after the end of March and September reporting periods each year.
- A significant dealing in the product which the regulated person becomes aware of is not consistent with the TMD. These should be reported as they are identified.



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