

# Target Market Determination

## Swaggle Pet Insurance – Comprehensive cover

Preparation date: 10 07 2025

Effective date: 29 08 2025

This Target Market Determination (TMD) applies to:

- > **Issuer:** Guild Insurance Limited (Guild Insurance), ABN 55 004 538 863, AFS Licence No: 233791
- > **Product:** Swaggle Pet Insurance – Comprehensive cover

This TMD is intended to provide distributors and customers with information regarding the class of customers this product has been designed for, taking into consideration their likely objectives, financial situation and personal needs.

This TMD does not provide any financial product advice, and does not consider any individual customer's needs, objectives or financial situation.

This TMD does not replace the terms and conditions and disclosures made in the Product Disclosure Statement (PDS) and Policy Wording.

For further information on the approach to developing and distributing insurance products that we issue, visit: <https://www.guildinsurance.com.au/swaggle-tmd>

This TMD sets out:

- > who is in our target market and who the product is not designed for;
- > any distribution conditions and restrictions for this product;
- > review periods and events that may trigger a review; and
- > reporting obligations of our distributors.

### Swaggle Pet Insurance

Swaggle Pet Insurance cover has been designed for responsible owners of domestic pet cats or dogs, resident within Australia, seeking to reduce bill shock from large and unexpected vet costs essential to the treatment of their pet for accidental injuries or illnesses.

### Comprehensive cover

**Comprehensive cover** has been specifically designed for those owners who are looking for broad cover for accidental injuries; willing to maintain a lower premium by taking on the risk of some illnesses; whilst being covered for a specified range of illnesses.

#### This product is suitable for:

Y	Domestic cat and/or dog owners
Y	Pet owners who regularly visit their vet, follow their vet's advice and provide proper maintenance and preventive care for their pet
Y	Pet owners seeking cover for unexpected and essential vet treatment costs associated with accidental injury or a specified range of illnesses for their pet
Y	Pet owners and their pets who are resident within Australia
Y	Pet owners who are looking to maintain a lower premium by retaining the cost for a wide range of illnesses

Y	Pet owners with the likely financial situation to be able to pay premiums in accordance with the chosen premium structure, and can afford to pay the chosen excess amount(s) in the event of a claim
Y	Pet owners who have the financial means to pay in full emergency treatment costs and to then seek reimbursement
Y	Pet owners who are seeking optional cover for limited consultation, vaccination, dental check-up, alternative therapy or behavioural therapy costs

**This product may not be suitable for:**

N	Pet owners who are seeking full illness cover
N	Pet owners who are seeking cover for their pet's pre-existing conditions
N	Pet owners who are unwilling to carry the risk of accident or illness occurring during mandatory waiting periods
N	Pet owners who are seeking cover for the first time, after their pet's 9th birthday
N	Pet owners who are seeking cover for any treatment connected with breeding (whether commercial or not)
N	Pet owners who are seeking cover for any treatment connected with commercial use of their pet
N	Pet owners who are seeking cover for transplant or stem-cell treatment costs
N	Pet owners who are seeking cover for elective treatment, including de-sexing
N	Pet owners who are seeking optional cover for specified dental care or dental treatment
N	Pet owners who are seeking to have claims for treatment costs paid directly to their vet in all circumstances. We can only do this when their vet agrees for us to do so

**Distribution Conditions**

Customers that obtain the product(s) in accordance with the distribution conditions set out below are likely to be in the target market because the application process and systems used for its distribution have been specifically designed to align distribution to customers in the target market.

A customer may fall within the target market described in this TMD, but as determined during the application process may not meet the underwriting criteria for a product.

Guild Insurance oversees the distribution processes and sales portal provided by the distributors of this product. All representatives are provided with adequate training in the distribution of the products covered by this TMD and the application process, and routinely monitored by us.

<b>Distribution Conditions &amp; Restrictions</b>	<p>The product is only available to existing Comprehensive policyholders.</p> <p>The product is not available for sale to new customers.</p> <p>The sales channels are owned and managed by Guild Insurance.</p>
<b>Distribution Method</b>	<ul style="list-style-type: none"> <li>&gt; The product is only available to existing Comprehensive policyholders.</li> <li>&gt; The product is not available for sale to new customers.</li> <li>&gt; Any advice provided is of a general nature only and does not take into consideration the customer's objectives, financial situation or needs.</li> </ul>

**Review Triggers**

<b>First Review</b>	> Within 12 months of the first issue of this TMD
<b>Periodic Review</b>	> Within 24 months of each subsequent review or within 12 months of any significant changes to the TMD

**Other circumstances that may trigger a review of this document prior to a periodic review**

It is possible that certain events or circumstances may trigger a review prior to the scheduled periodic review. This could include Guild Insurance becoming aware of:

- > a material change to the product including Product Disclosure Statement, information or assumptions upon which the target market was formulated;
- > a change of relevant law, regulatory guidance or industry code which has a material effect on the terms or distribution of the product;
- > a determination of the Australian Financial Complaints Authority (AFCA), a court or other tribunal which suggests that the target market may no longer be appropriate;
- > the product is being distributed and purchased in a way that is significantly inconsistent with this TMD;
- > a significant increase in the number or nature of complaints relating to the product;
- > a significant increase in the number or ratio of claims declined, or a significant increase in cancellation volumes;
- > other systemic complaints or claims issues relating to the product received by us or reported by distributors;
- > the nature and extent of feedback from distributors, customers or industry bodies is materially different to what we expected; or
- > any significant dealings outside the TMD and which we consider reasonably suggest that this TMD is no longer appropriate.

If any circumstances trigger a review of this document prior to the Periodic Review, then this TMD will be reviewed within 10 business days of Guild Insurance first becoming aware of such trigger.

**Reporting Obligations**

Guild Insurance and its distributors will ensure that the following information is collected and monitored.

Information Required	Description	Reporting Period
Complaints	Number and nature of complaints received for this product	Quarterly
Feedback	Any feedback that will assist us to improve the product, including customer feedback that may imply confusion or dissatisfaction about product cover	Quarterly
Sales	Sales data including number of policies, renewal and cancellation numbers	Quarterly
Claims	Claims data including the number of claims that are paid and declined	Quarterly
Significant Dealings	If an actual or possible significant dealing outside of the target market is identified, we require information such as the date (or date range) the dealing occurred, details about the dealing(s) and any steps or actions taken to mitigate	As soon as practicable and within 10 business days of significant dealing being identified

This document is not intended to contain all details of customers who are suitable for this product, as that is determined via our application process. Whilst we provide details of who the product is not designed for, the list is not exhaustive. A customer should always refer to the Product Disclosure Statement to ensure the product is right for them. If you require further information, please contact us on: [petinsurance@swaggle.com.au](mailto:petinsurance@swaggle.com.au) or **1300 738 730**.

