

Environmental Liability – The Hartford

Glemham Underwriting Ltd has appropriate oversight and governance systems and controls in place to ensure products have been assessed as providing fair value to customers within the identified target market. In accordance with obligations under PROD 4.2, we have carried out a Product Review and Fair Value Assessment as a co-manufacturer of this product.

Most Recent Assessment: February 2026
Next Assessment Due By: February 2027

- Based on the assessments carried out, we are satisfied that:
- The product meets the needs of the identified target market
 - The product provides fair value to the target market
 - The distribution strategy remains appropriate

We test products prior to their release and over their lifetime (including where there is significant change to the product or the target market, or MI indicates further testing is required). Therefore, the next assessment may take place before the above date and this document updated accordingly.

Product name	Environmental Liability
Manufacturer(s)	Hartford Underwriting Agency Ltd and Glemham Underwriting Ltd
Brief description	This product protects policyholders’ businesses if they are found to be legally liable to pay compensation in respect of pollution or environmental damage
Availability	As a compulsory section within our Farm Combined (package) policy, or standalone (not an add-on or part of a package). Open to new and renewal business
Who is the product suitable for?	<ul style="list-style-type: none"> • Farms including arable, livestock and dairy • Micro to medium UK market (not consumers) • Trades targeted include commercial property owners, small to medium-size manufacturing risks, retail, contractors and haulage
Who is the product not suitable for?	<ul style="list-style-type: none"> • Consumers • Risks outside of the UK, offshore risks and international risk
Key features of cover (high level summary)	Cover is for First and Third Party Environmental Damages, Clean Up Costs and Environmental Damage Costs, and associated Legal Defence Costs. Example claim would be leak of hazardous chemicals into water
How should this product be distributed?	The product is designed to be distributed through UK insurance intermediaries (FCA regulated firms and their Appointed Representatives). The intermediary should provide advice and guidance to the customer on the suitability of the product and appropriate levels of cover
What should distributors do to ensure the product provides fair value to the end customer?	<ul style="list-style-type: none"> • Care must be taken to ensure no duplicate cover exists • Remuneration (commission and fees / charges) must not exceed the maximum levels stipulated in the agency agreement and should be proportionate to costs incurred by the distributor and services they provide • Distributors must ensure that any additional services offered to customers, such as retail premium finance, do not detrimentally affect product value • Individual customer needs must be considered, including those of vulnerable customers with services adapted accordingly
Product literature	Full information about the product can be found in the Policy Summary and Wording, which should be read in conjunction with the Policy / Quote Schedule

Product Review and Fair Value Assessment – Further Information

Our reviews and assessments utilise the management information set out in the table below, which incorporates information provided by our distributors. Where indicators and measures fall outside of our agreed tolerance levels, we investigate these to ensure that the product continues to meet the needs of and provide value to the target market, and the distribution strategy remains appropriate.

	Products and Services	Price and Value	Customer Understanding	Customer Support
Ancillary products and services	✓	✓		
Cancellation metrics	✓		✓	
Claims metrics	✓		✓	✓
Competitor products	✓	✓		
Complaints metrics (sales and claims)	✓		✓	✓
Customer feedback	✓	✓		✓
Distribution strategy		✓	✓	✓
Internal audit results	✓		✓	✓
Internal feedback	✓		✓	✓
Operational service		✓		
Premium finance metrics	✓	✓		
Previous assessment of the product	✓	✓		
Pricing metrics		✓		
Quality assurance	✓			✓
Remuneration		✓		
Renewal ratios / customer tenure	✓	✓	✓	
Target market assessment	✓	✓	✓	✓
Vulnerable customer considerations	✓	✓	✓	✓

Outcome of Assessment

Our assessment of the data confirms the ongoing fair value of this product.