

**Jessica Zhang**

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**From:** s 22  
**Sent:** Wednesday, 28 June 2023 2:54 PM  
**To:** s 22  
**Cc:** s 22  
**Subject:** RE: Interim stop orders regarding pet insurance products offered by PetSure (Australia) Pty Ltd [SEC=OFFICIAL]

Hi s 22 ,

Thanks for your confirmation below.

Myself and s 22 are available at 3:30pm today to discuss. I'll shortly send an MS Teams invitation.

Regards,

s 22

s 22

Senior Lawyer — Insurers

Financial Services and Wealth Group

**Australian Securities and Investments Commission**

Hub Australia, Civic Quarter

Level 2, 68 Northbourne Ave ACT 2601

Mob: +61 (0)435 033 241

s 22 [@asic.gov.au](mailto:s22@asic.gov.au)



**ASIC**

ASIC acknowledges the Traditional Owners of the lands and waters on which we live and work. We pay respect to Elders past and present as the custodians of the world's oldest continuing cultures.

s 22

# s 22

From: s 22 <[REDACTED]@asic.gov.au>

Sent: Wednesday, June 28, 2023 1:32 PM

To: s 22 <[REDACTED]@petsure.com.au>

Cc: s 22 <[REDACTED]@asic.gov.au>; s 22 <[REDACTED]@asic.gov.au>; s 22 <[REDACTED]@asic.gov.au>

Subject: Interim stop orders regarding pet insurance products offered by PetSure (Australia) Pty Ltd [SEC=OFFICIAL]

**Caution:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe

Dear s 22,

Thank you for your time on the phone today and for confirming verbally that you can accept service via email of the attached Interim Stop Orders.

As discussed, please find attached the following:

1. Notice of Hearing.
2. Five Interim Stop Orders issued under subsection 994J(4) of the *Corporations Act 2001* (Cth) in respect of pet insurance products listed in the orders.
3. Statement of Concerns that sets out the concerns of the ASIC delegate that are the basis of the interim orders; and
4. Administrative hearings information sheet <https://asic.gov.au/about-asic/dealing-with-asic/administrative-hearings/>

Please confirm by return email that:

- you have accepted service of the five Interim Stop Orders, and
- you can open and read each of the attachments.

Please note, ASIC intends to issue a media release regarding the issuing of these Interim Stop Orders shortly.

If you have any questions in relation to the matter, please do not hesitate to contact me.

Regards,

s 22

[REDACTED]

Senior Lawyer — Insurers  
Financial Services and Wealth Group

**Australian Securities and Investments Commission**

Hub Australia, Civic Quarter  
Level 2, 68 Northbourne Ave ACT 2601  
Mob: +61 (0)435 033 241

s 22 [\[REDACTED\]@asic.gov.au](mailto:[REDACTED]@asic.gov.au)

[REDACTED]

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**ASIC**  
Australian Securities &  
Investments Commission

Australian Securities  
and Investments Commission

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28 June 2023

The Directors  
PetSure (Australia) Pty Ltd  
ACN 075 949 923  
Level 1, 465 Victoria Avenue  
Chatswood NSW 2067

By email: **s 22** [@petsure.com.au](mailto:s22@petsure.com.au)

Dear Directors

The Australian Securities and Investments Commission (**ASIC**) has reviewed the target market determinations (**TMD**) of PetSure (Australia) Pty Ltd ACN 075 949 923 (**Company**) in relation to pet insurance products listed in **Schedule 1** below (**Products**) and has concerns that the Company has contravened the design and distribution obligations in Part 7.8A of the Corporations Act.

As a result of these concerns, ASIC has made interim stop orders under s994J(4) of the *Corporations Act 2001* (Act) on specified conduct in relation to the Products. ASIC has made interim orders because it is satisfied that any delay in making final orders under subsection 994J(1) of the Act, pending the holding of a hearing, would be prejudicial to the public interest.

**ASIC has placed interim stop orders under s994J(4) because ASIC is concerned the Company has breached the Corporations Act**

- **The interim orders last 21 days. While the orders are in force, you must not do the following (Specified Conduct):**
  - **Deal in the Products in relation to a retail client, unless the dealing amounts to exempted conduct as defined by the orders;**
  - **Provide general advice in relation to the Products to a retail client, unless the advice amounts to excluded conduct as defined by s994A(1).**
- **You must take all reasonable steps to ensure that other people who engage in the Specified Conduct are aware of the orders: s994J(7).**

I refer to my telephone conversation with **s 22** (Chief Legal Officer, PetSure (Australia) Pty Ltd) on 28 June 2023 and confirm that **s 22** agreed to accept service of this letter and its enclosures by email.

The purpose of this letter is to:

1. inform you of the concerns (explained in the enclosed Statement of Concerns) which were the basis of the Interim Orders;
2. offer you the opportunity to make written or oral submissions on the question of whether Final Orders should be made on the basis of ASIC's concerns; and
3. advise you that ASIC intends to hold a hearing under subsection 994J(3) of the Act on this question, if our concerns are not satisfactorily addressed by the date scheduled for the hearing.

The effect of the Interim Orders are that, **for 21 days after the date on which the Interim Orders were made, unless it is revoked before then, the Company must not engage in Specified Conduct.** A hearing has been scheduled to consider whether Final Orders should be placed on the Products.

The Interim Orders may be revoked prior to the hearing if ASIC's concerns in relation to the Products are addressed.

#### What should you do now?

1. **Read this letter and the enclosed Statement of Concerns, carefully considering the matters set out.** The Statement of Concerns sets out why ASIC is concerned the Company has contravened the design and distribution provisions in Division 2 of Pt 7.8A of the Act. You may wish to seek professional advice about how you want to address the concerns.
2. **Speak to the ASIC Officers responsible for the matter** in relation to any questions you have. You can call:
  - s 22 [REDACTED] on 0478 366 019; or
  - s 22 [REDACTED] on 0435 033 241.
3. **Decide how you wish to proceed by:**
  - providing written submissions and/or revised draft TMDs in mark up to the ASIC Officers responsible for the matter; or
  - proceeding directly to a hearing by notifying s 22 [REDACTED] or s 22 [REDACTED] **by 5:00pm (AEST) on 7 July 2023** that you will:
    - o provide written submissions; and/or
    - o attend the hearing in person.

If you wish to resolve the concerns and do not wish to progress to a hearing, please provide written submissions addressing ASIC's concerns, and/or revised draft TMDs in mark up, directly to the ASIC Officers who are responsible for your matter as soon as possible, and before the commencement of the hearing.

The decision to revoke the Interim Orders are a matter for the Delegate. While ASIC Officers will work closely with you to address ASIC's concerns, they cannot influence the Delegate's decision.

## Hearing arrangements

If ASIC's concerns remain unresolved and the Interim Orders are not revoked, the matter will proceed to a hearing. At the hearing, the Delegate will decide whether Final Orders should be made or whether the Interim Orders should be revoked.

If you do not wish to appear at the hearing, you may still choose to make written submissions and provide these prior to the commencement of the hearing. You may also attend the hearing and can choose to provide written submissions or other evidence at the hearing, or beforehand.

Written submissions should address ASIC's concerns and reasons why the Delegate should not make Final Orders or why the Interim Orders should be revoked. The Delegate will take these into account in reaching his or her decision.

**The Delegate has set aside two hours on 18 July 2023 for you to give evidence or make submissions or both.** The hearing will commence at **1:00pm (AEST)** and be held by teleconference, details of which will be provided at a later date.

If these arrangements are not convenient or if you consider the period that the Delegate has allowed for the hearing is inappropriate, please let me know as soon as possible. If you require the assistance of an interpreter, you should let me know so that suitable arrangements can be made.

The hearing will be conducted in private and the Delegate and ASIC Officers responsible for your matter will be in attendance. If you do not wish to appear at the hearing or make any written submissions, a decision will be made on the information that the Delegate has before him or her, and may, without further consultation with you, make Final Orders.

## What happens at a hearing?

ASIC's hearings are administrative proceedings which are conducted with informality and as expeditiously as possible. The rules of evidence do not apply, but ASIC is required to observe the rules of natural justice: section 59 of the *Australian Securities and Investments Commission Act 2001* (Cth) (**ASIC Act**).

For more information about the hearing process, please see the enclosed Information Sheet 1 *Administrative hearings*.

You have a right to legal representation: section 56 and subsection 59(8) of the ASIC Act. However, it is a matter for you to decide whether to have legal representation or not.



Yours faithfully

s 22

**Insurers**

**Australian Securities and Investments Commission**

- Encl.   1. Interim Orders (5 in total)  
          2. Statement of Concerns  
          3. Information Sheet 1 *Administrative hearings*

**SCHEDULE 1**  
**Pet insurance products issued by PetSure (Australia) Pty Ltd ('Products')**

<b>Products</b>	<b>Effective date of Target Market Determination</b>
<a href="#">Bow Wow Meow Pet Insurance - Accident Plus Plan</a>	14 June 2023
<a href="#">Bow Wow Meow Pet Insurance - Peace of Mind Plan and Ultimate Care Plan</a>	14 June 2023
<a href="#">Bow Wow Meow Pet Insurance - Indoor Cat Plan</a>	14 June 2023
<a href="#">Pet Insurance Australia - Pet Essentials Cover</a>	8 May 2023
<a href="#">Pet Insurance Australia - Comprehensive Cover and Major Medical Cover</a>	8 May 2023



**Australian Securities and Investments Commission  
STATEMENT OF CONCERNS**

**Grounds for hearing pursuant to section 994J of the *Corporations Act 2001***

**PetSure (Australia) Pty Ltd  
ACN 075 949 923**

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This statement of concerns explains why the Australian Securities and Investments Commission (**ASIC**) considers that an order should be made under section 994J(4) of the *Corporations Act 2001* (**Act**). All statutory references in this document are to the Act (unless otherwise stated).

**I. BACKGROUND**

- 1 PetSure (Australia) Pty Ltd (ACN 075 949 923; AFSL 420183) (**PetSure**) is a general insurer. PetSure issues retail general insurance products through multiple third-party distributors and under various brands.
- 2 Since 8 May 2023, PetSure has made Target Market Determinations (**TMD**) in relation to multiple pet insurance products (the **Products**). The Products and their corresponding TMDs are listed in **Schedule 1**.
- 3 PetSure issues the Products for policies first issued on or after the effective date of the TMD. For policies first issued before this date, The Hollard Insurance Company Pty Ltd (ACN 090 584 473; AFSL 241436) (**Hollard**) issues the Products, and PetSure arranges and administers the Products for Hollard under a binding authority. Each individual pet insurance product is distributed by an authorised representative of Hollard or PetSure, which is usually the owner of that product's brand. The Products are usually distributed directly to consumers by the relevant authorised representative through their website or call centre.
- 4 The Products provide cover for eligible veterinary expenses incurred by the policyholder, in respect of an insured dog or cat.

- 5 Policyholders normally pay the full cost of any veterinary expenses upfront and are subsequently reimbursed following an accepted claim. Some of the Products provide a 'GapOnly' claims option; when receiving treatment from a participating veterinary service provider, the upfront cost to the policyholder equals the amount that will not be reimbursed under a claim.
- 6 The extent of the cover provided varies across individual pet insurance products and is specified in that product's Product Disclosure Statement (**PDS**). The benefit payable equals a specified percentage of eligible veterinary expenses, up to the annual benefit limit and any applicable sub-limits. The Products provide benefits for expenses incurred in relation to accidental injuries and/or illnesses specified in the relevant PDS.
- 7 The Products generally exclude cover for veterinary expenses incurred in respect of:
  - (a) pre-existing conditions;
  - (b) dental, routine and preventative treatments, unless optional cover is purchased;
  - (c) specified treatments and conditions (e.g. breeding and behavioural therapy); and
  - (d) specified services and procedures (e.g. transportation expenses).
- 8 Premiums are calculated based on the characteristics of the insured pet, including age, sex, breed and whether the pet has been desexed.
- 9 This statement of concerns relates to the TMDs corresponding to the Products.
- 10 ASIC has reviewed the TMDs of the Products and is concerned that there have been contraventions of subsection 994B(8)(b).
- 11 The reasons for ASIC's concerns are set out in Part III of this Statement of Concerns.

## II. RELEVANT LAW

### *Application of Part 7.8A*

- 12 ASIC considers that Part 7.8A applies to the Products as PetSure is required to prepare PDSs under Part 7.9: s994B(1)(b).
- 13 ASIC has reason to believe that there has been “retail product distribution conduct” as defined by s994A(1) and specifically “(a) dealing in the product in relation to a retail client”, in relation to the Products.
- 14 Section 766C sets out conduct that “constitutes dealing in a financial product” which includes “(b) issuing a financial product.” See also the definition of “dealing” in s994A(1) for amendments to the s766C definition for the purposes of Part 7.8A.
- 15 Section 761G(5) deems a personal and domestic property insurance product provided to a person as an individual or used in connection with a small business to be a financial product provided to a retail client. The Products are personal and domestic property insurance products as defined in reg 7.1.17 of the Corporations Regulations 2001, given the meaning of “property” in that regulation includes a domestic pet.

### *Stop order power*

- 16 Subsections (1) and (2) of section 994J relevantly provide:

*(1) This section applies if ASIC is satisfied that a provision of Division 2, or section 994E, has been contravened in relation to a financial product.*

*(2) ASIC may order, in writing, that specified conduct in relation to retail clients in respect of the financial product (except excluded conduct) must not be engaged in while the order is in force. The order is not a legislative instrument.*

***Design and distribution obligations relating to financial products for retail clients***

17 Subsection 994A(1) provides:

*"target market determination" means a determination that:*

- (a) is made as required by section 994B; and*
- (b) meets the requirements of subsections 994B(5) and (8).*

18 Subsection 994B(1) provides:

*"Subject to subsection (3), a person must make a target market determination for a financial product if:*

*...*

- (b) under Part 7.9, the person is required to prepare a Product Disclosure Statement for the product;"*

19 Subsection 994B(2) provides:

*"A person required by subsection (1) to make a target market determination for a financial product must do so before:*

- (a) if paragraph (1)(a), (b) or (ba) applies—any person engages in retail product distribution conduct in relation to the product;"*

20 Subsection 994A(1) provides:

***"retail product distribution conduct,** in relation to a financial product, means any of the following:*

- (a) dealing in the product in relation to a retail client;*

*...*

- (c) under Part 7.9, giving a Product Disclosure Statement for the product to a retail client"*

21 Subsection 994B(5) provides:

*“A target market determination for a financial product must:*

- ...
- (b) describe the class of retail clients that comprises the target market (within the ordinary meaning of the terms) for the product; and*
  - (c) specify any conditions and restrictions on retail product distribution conduct in relation to the product (distribution conditions), other than a condition or restriction imposed by or under another provision of this Act;”.*

- 22 Failure to comply with subsection 994B(2) is an offence. Subsection 994B(2) is also a civil penalty provision.

### III. ASIC'S CONCERNS

#### ***Contravention of subsection 994B(8) – failure to describe consumers’ financial situation***

- 23 Subsection 994B(8) provides:

*“A target market determination for a financial product must be such that it would be reasonable to conclude that, if the product were to be issued, or sold in a regulated sale:*

- ...
- (b) to a retail client in the target market – it would likely be consistent with the likely objectives, financial situation and needs of the retail client.”*

- 24 ASIC Regulatory Guide 274 *Product design and distribution obligations* (**RG 274**) relevantly states the following:

- (a) Issuers will need to consider each of the likely objectives, financial situation and needs of consumers in the target market: see RG 274.72.
- (b) When identifying common objectives, financial situation and needs of consumers, issuers could usefully consider characteristics such as likely common income levels, savings levels and employment status: see RG 274.74.

- (c) The class of consumer that comprise the target market should be defined with objective, tangible parameters so that it is clear which consumers form part of the target market. This assists issuers in meeting their appropriateness requirements and distributors with meeting their distribution obligations: see RG 274.80.

- 25 All TMDs of the Products describe the likely objectives, financial situation and needs of consumers in the target market as below:

*“The likely objectives, financial situation and needs of customers in the target market is a contribution towards eligible veterinary expenses, to ensure their pet can receive appropriate treatment and to reduce the cost to the customer of that treatment.”*

- 26 Under the heading “Target Market for this product” the TMDs provide descriptions of the overall target market and the target markets for each level of cover (e.g. Basic, Standard, Comprehensive).

- 27 ASIC notes that these descriptions refer to the objectives and needs of consumers. For example, the TMDs of the Products refer to the objective of reducing the cost to the consumer of their pet’s veterinary treatment.

- 28 However, ASIC considers that the descriptions fail to include detail about consumers’ financial situation. In particular, they include no detail about the financial situation of consumers that would be relevant to key features of the Product and the costs that may be incurred by a policyholder in making a claim. For example, they fail to refer to consumers’ financial situation in respect to their ability to pay:

- (a) premiums (which may vary from time-to-time);
- (b) upfront costs for veterinary expenses which are subsequently reimbursed under an accepted claim (unless the ‘GapOnly’ claims option is available);

- (c) any costs above the applicable benefit percentages; and
- (d) potential costs above applicable annual benefit limits.

29 ASIC also considers the upfront costs and the reimbursement-based claims process are key attributes which can impact the suitability of the Products for a class of consumers and, therefore, should be included in the TMDs' description of the Products' key attributes.

30 Given there is no description of the consumers' financial situation there is insufficient information to reasonably conclude that if any of the Products was issued to a retail client in the target market, it would likely be consistent with the financial situation of the retail client.

31 Accordingly, ASIC is concerned that the TMDs contravene paragraph s994B(8)(b).

***Circumstances Justifying an Order under subsection 994J***

32 Section 994J applies if ASIC is satisfied that a provision of Division 2 of Part 7.8A has been contravened in relation to a financial product: subsection 994J(1).

33 Subsection 994J(2) provides that ASIC may order that specified conduct in relation to retail clients in respect of the financial product (except excluded conduct) must not be engaged in while the order is in force. Before making an order under subsection 994J(2), ASIC is required to hold a hearing and give a reasonable opportunity to any interested person to make submissions to ASIC on whether an order should be made: subsection 994J(3).

34 However, if ASIC considers that any delay in making an order pending the holding of a hearing would be prejudicial to the public interest, ASIC may make an interim order without a hearing. This interim order may last for 21 days after the day on which it is made unless revoked before then: subsection 994J(4).

35 For the reasons set out in paragraphs 23–31, ASIC is concerned that there have been contraventions of subsection 994B(8)(b).



- 36 ASIC considers that the nature of these contraventions means that a delay in making an order would be prejudicial to the public interest, in particular the inappropriate target market identified in the TMDs may result in sales to retail clients for whom the Products would not likely meet their likely objectives, financial situation and needs.



**as a delegate of the Australian Securities and Investments Commission**  
28 June 2023

**SCHEDULE 1**  
**Pet insurance products issued by PetSure (Australia) Pty Ltd**

<b>Products</b>	<b>Effective date of Target Market Determination</b>
<a href="#"><u>Bow Wow Meow Pet Insurance - Accident Plus Plan</u></a>	14 June 2023
<a href="#"><u>Bow Wow Meow Pet Insurance - Peace of Mind Plan and Ultimate Care Plan</u></a>	14 June 2023
<a href="#"><u>Bow Wow Meow Pet Insurance - Indoor Cat Plan</u></a>	14 June 2023
<a href="#"><u>Pet Insurance Australia - Pet Essentials Cover</u></a>	8 May 2023
<a href="#"><u>Pet Insurance Australia - Comprehensive Cover and Major Medical Cover</u></a>	8 May 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

INTERIM ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Pet Insurance Australia - Comprehensive Cover and Major Medical Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission makes an interim order that the following specified conduct in relation to retail clients in respect of Pet Insurance Australia - Comprehensive Cover and Major Medical Cover the subject of the Target Market Determination dated 8 May 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

This order lasts for 21 days after the day on which it is made unless revoked before then.

Under subsection 994J(7), the person on whom the order is served must take all reasonable steps to ensure that other people who engage in conduct to which the order applies are aware of the order.

**Interpretation**

***dealing*** has the meaning given by subsection 994A(1) of the Act.

***excluded conduct*** has the meaning given by subsection 994A(1) of the Act.

***exempted conduct*** means dealing in Pet Insurance Australia - Comprehensive Cover and Major Medical Cover the subject of the Target Market Determination dated 8 May 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

***general advice*** has the meaning given by section 766B of the Act.

***retail client*** has the meaning given by section 761A of the Act.

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s 22

Signed by s 22

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as a delegate of the Australian Securities and Investments Commission

Dated: 28 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

INTERIM ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Pet Insurance Australia - Pet Essentials Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission makes an interim order that the following specified conduct in relation to retail clients in respect of Pet Insurance Australia - Pet Essentials Cover the subject of the Target Market Determination dated 8 May 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

This order lasts for 21 days after the day on which it is made unless revoked before then.

Under subsection 994J(7), the person on whom the order is served must take all reasonable steps to ensure that other people who engage in conduct to which the order applies are aware of the order.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Pet Insurance Australia - Pet Essentials Cover the subject of the Target Market Determination dated 8 May 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

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s 22

Signed by s 22

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as a delegate of the Australian Securities and Investments Commission

Dated: 28 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

**INTERIM ORDER**  
**SUBSECTIONS 994J(2) AND (4)**  
***CORPORATIONS ACT 2001***

**RE: Bow Wow Meow Pet Insurance - Accident Plus Plan**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission makes an interim order that the following specified conduct in relation to retail clients in respect of Bow Wow Meow Pet Insurance - Accident Plus Plan the subject of the Target Market Determination dated 14 June 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

This order lasts for 21 days after the day on which it is made unless revoked before then.

Under subsection 994J(7), the person on whom the order is served must take all reasonable steps to ensure that other people who engage in conduct to which the order applies are aware of the order.

**Interpretation**

***dealing*** has the meaning given by subsection 994A(1) of the Act.

***excluded conduct*** has the meaning given by subsection 994A(1) of the Act.

***exempted conduct*** means dealing in Bow Wow Meow Pet Insurance - Accident Plus Plan the subject of the Target Market Determination dated 14 June 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

***general advice*** has the meaning given by section 766B of the Act.

***retail client*** has the meaning given by section 761A of the Act.

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s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 28 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

INTERIM ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Bow Wow Meow Pet Insurance - Indoor Cat Plan**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission makes an interim order that the following specified conduct in relation to retail clients in respect of Bow Wow Meow Pet Insurance - Indoor Cat Plan the subject of the Target Market Determination dated 14 June 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

This order lasts for 21 days after the day on which it is made unless revoked before then.

Under subsection 994J(7), the person on whom the order is served must take all reasonable steps to ensure that other people who engage in conduct to which the order applies are aware of the order.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Bow Wow Meow Pet Insurance - Indoor Cat Plan the subject of the Target Market Determination dated 14 June 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

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s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 28 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

INTERIM ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Bow Wow Meow Pet Insurance - Peace of Mind Plan and Ultimate Care Plan**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission makes an interim order that the following specified conduct in relation to retail clients in respect of Bow Wow Meow Pet Insurance - Peace of Mind Plan and Ultimate Care Plan the subject of the Target Market Determination dated 14 June 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

This order lasts for 21 days after the day on which it is made unless revoked before then.

Under subsection 994J(7), the person on whom the order is served must take all reasonable steps to ensure that other people who engage in conduct to which the order applies are aware of the order.

**Interpretation**

***dealing*** has the meaning given by subsection 994A(1) of the Act.

***excluded conduct*** has the meaning given by subsection 994A(1) of the Act.

***exempted conduct*** means dealing in Bow Wow Meow Pet Insurance - Peace of Mind Plan and Ultimate Care Plan the subject of the Target Market Determination dated 14 June 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

***general advice*** has the meaning given by section 766B of the Act.

***retail client*** has the meaning given by section 761A of the Act.

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s 22

Signed by s 22

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as a delegate of the Australian Securities and Investments Commission

Dated: 28 June 2023

**Jessica Zhang**

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**From:** s 22  
**Sent:** Thursday, 29 June 2023 11:51 AM  
**To:** s 22  
**Cc:** s 22  
**Subject:** RE: Interim stop orders regarding pet insurance products offered by PetSure (Australia) Pty Ltd [SEC=OFFICIAL]

Dear s 22 and s 22

Following receipt of the revised TMD yesterday, the Delegate has reviewed the TMD and requests Hollard and PetSure to provide the following:

1. A revised TMD that shows the proposed changes for a TMD that covers products with multiple levels of cover (e.g. Essentials, Premium, Premium Plus).
2. A copy of the questions posed to customers via the online quotation tool (for online) and systems-based call scripts (for phone) and business rules (i.e. what happens when a customer answers yes or no to each question).

Regards,

s 22

Senior Lawyer — Insurers  
Financial Services and Wealth Group

**Australian Securities and Investments Commission**

Hub Australia, Civic Quarter  
Level 2, 68 Northbourne Ave ACT 2601  
Mob: +61 (0)435 033 241

s 22 [@asic.gov.au](mailto:s 22@asic.gov.au)



**ASIC**

ASIC acknowledges the Traditional Owners of the lands and waters on which we live and work. We pay respect to Elders past and present as the custodians of the world's oldest continuing cultures.

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**From:** s 22 [@asic.gov.au](mailto:s 22@asic.gov.au)  
**Sent:** Wednesday, 28 June 2023 5:36 PM  
**To:** s 22 [@petsure.com.au](mailto:s 22@petsure.com.au); s 22 [@asic.gov.au](mailto:s 22@asic.gov.au)  
**Cc:** s 22 [@asic.gov.au](mailto:s 22@asic.gov.au); s 22 [@asic.gov.au](mailto:s 22@asic.gov.au); s 22 [@hollard.com.au](mailto:s 22@hollard.com.au)  
**Subject:** RE: Interim stop orders regarding pet insurance products offered by PetSure (Australia) Pty Ltd [SEC=OFFICIAL]

Thanks s 22 acknowledging receipt. We will revert to you as soon as we can.

Kind regards

s 22

s 22

Senior Manager — Insurers  
Financial Services & Wealth Group

**Australian Securities and Investments Commission**

Level 7, 120 Collins Street, Melbourne VIC 3000  
Tel: +61 3 9280 3362 Mob: +61 (0)478 366 019

s 22

[@asic.gov.au](mailto:asic@asic.gov.au)



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s 22



s 22

FOI 129-2023

s 22

FOI 129-2023

**Jessica Zhang**

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**From:** s 22  
**Sent:** Thursday, 29 June 2023 5:00 PM  
**To:** s 22  
**Cc:** s 22  
**Subject:** Revocation of interim stop orders for PetSure and Hollard pet insurance products  
 [SEC=OFFICIAL]  
**Attachments:** Notice of Revocation of Order - Manchester Unity Pet Insurance.pdf; Notice of Revocation of Order - Medibank Pet Insurance.pdf; Notice of Revocation of Order - Pet Insurance Australia - Accident Only Cover.pdf; Notice of Revocation of Order - Pet Insurance Australia - Comprehensive Cover and Major Medical Cover.pdf; Notice of Revocation of Order - Pet Insurance Australia - Pet Essentials Cover.pdf; Notice of Revocation of Order - Petbarn Insurance Core and Core Plus Cover.pdf; Notice of Revocation of Order - Petbarn Insurance Total Cover.pdf; Notice of Revocation of Order - Petinsurance.com.au - Cover for Cats.pdf; Notice of Revocation of Order - Petinsurance.com.au - Cover for Dogs.pdf; Notice of Revocation of Order - Petinsurance.com.au - Cover for Puppies.pdf; Notice of Revocation of Order - Petinsurance.com.au - Indoor Cat Cover.pdf; Notice of Revocation of Order - Petinsurance.com.au Best in Show - Bronze Cover for Indoor Cat.pdf; Notice of Revocation of Order - Petinsurance.com.au Best in Show - Gold and Platinum Cover.pdf; Notice of Revocation of Order - Petinsurance.com.au Best in Show - Silver Cover.pdf; Notice of Revocation of Order - Pounce Pet Insurance - Basic Cover.pdf; Notice of Revocation of Order - Pounce Pet Insurance - Indoor Cat Cover.pdf; Notice of Revocation of Order - Pounce Pet Insurance - Standard and Premium Cover.pdf; Notice of Revocation of Order - Prime Pet Insurance - Regal Cover.pdf; Notice of Revocation of Order - Prime Pet Insurance - Royal, Imperial and Sovereign Cover.pdf; Notice of Revocation of Order - Real Pet Insurance - Accidental, Premium and Standard Cover.pdf; Notice of Revocation of Order - Real Pet Insurance - Classic Cover.pdf; Notice of Revocation of Order - RSPCA Pet Insurance - Basic, Economy, Ultimate and Ultimate Plus Cover.pdf; Notice of Revocation of Order - RSPCA Pet Insurance General Cover.pdf; Notice of Revocation of Order - Seniors Pet Insurance - Basic Cover.pdf; Notice of Revocation of Order - Seniors Pet Insurance - Top, Essential and Accident Only Cover.pdf; Notice of Revocation of Order - Bow Wow Meow Pet Insurance - Accident Plus Plan.pdf; Notice of Revocation of Order - Bow Wow Meow Pet Insurance - Indoor Cat Plan.pdf; Notice of Revocation of Order - Bow Wow Meow Pet Insurance - Peace of Mind Plan and Ultimate Care Plan.pdf; Notice of Revocation of Order - Bupa Pet Insurance.pdf; Notice of Revocation of Order - Everyday Pet Insurance - Basic Accident.pdf; Notice of Revocation of Order - Everyday Pet Insurance - Basic, Standard, Comprehensive and Comprehensive Plus Cover.pdf; Notice of Revocation of Order - Everyday Pet Insurance - Indoor Cat.pdf; Notice of Revocation of Order - Guardian Pet Insurance - Bronze Cover.pdf; Notice of Revocation of Order - Guardian Pet Insurance - Silver, Gold and Platinum.pdf; Notice of Revocation of Order - Guide Dogs Pet Insurance - Basic, Comprehensive and Premium Cover.pdf; Notice of Revocation of Order - HCF Pet Insurance.pdf; Notice of Revocation of Order - Kogan Pet Insurance - Indoor Cat Cover.pdf; Notice of Revocation of Order - Kogan Pet Insurance Pet Primary, Pet Value and Pet Luxury Cover.pdf; Notice of Revocation of Order - Bow Wow Meow Pet Insurance - Indoor Cat Plan.pdf; Notice of Revocation of Order - Bow Wow Meow Pet Insurance - Peace of Mind Plan and Ultimate Care Plan.pdf; Notice of Revocation of Order - Bow Wow Meow Pet Insurance - Accident Plus Plan.pdf; Notice of Revocation of Order - Pet Insurance Australia - Comprehensive Cover and Major Medical Cover.pdf; Notice of Revocation of Order - Pet Insurance Australia - Pet Essentials Cover.pdf

Dear s 22 ,

As discussed via phone with you this afternoon, I attach revocation orders in relation to the interim stop orders issued yesterday.

I note your verbal agreement to accept service of these revocations via email.

Please confirm via return email that:

1. You have accepted service of the document on behalf of PetSure and Hollard.
2. That you can open and read all the attached revocations.

Regards,

s 22

[Redacted]

Senior Lawyer — Insurers  
Financial Services and Wealth Group

**Australian Securities and Investments Commission**

Hub Australia, Civic Quarter  
Level 2, 68 Northbourne Ave ACT 2601  
Mob: +61 (0)435 033 241

s 22 [@asic.gov.au](mailto:s22@asic.gov.au)



**ASIC**

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## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Bow Wow Meow Pet Insurance - Accident Plus Plan**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Bow Wow Meow Pet Insurance - Accident Plus Plan the subject of the Target Market Determination dated 14 June 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Bow Wow Meow Pet Insurance - Accident Plus Plan the subject of the Target Market Determination dated 14 June 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Bow Wow Meow Pet Insurance - Indoor Cat Plan**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Bow Wow Meow Pet Insurance - Indoor Cat Plan the subject of the Target Market Determination dated 14 June 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Bow Wow Meow Pet Insurance - Indoor Cat Plan the subject of the Target Market Determination dated 14 June 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023



**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***

**RE: Bow Wow Meow Pet Insurance - Peace of Mind Plan and Ultimate Care Plan**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Bow Wow Meow Pet Insurance - Peace of Mind Plan and Ultimate Care Plan the subject of the Target Market Determination dated 14 June 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Bow Wow Meow Pet Insurance - Peace of Mind Plan and Ultimate Care Plan the subject of the Target Market Determination dated 14 June 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Bupa Pet Insurance**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Bupa Pet Insurance the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Bupa Pet Insurance the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE:   Everyday Pet Insurance - Basic Accident**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Everyday Pet Insurance - Basic Accident the subject of the Target Market Determination dated 15 November 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Everyday Pet Insurance - Basic Accident the subject of the Target Market Determination dated 15 November 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Everyday Pet Insurance - Basic, Standard, Comprehensive and Comprehensive Plus Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Everyday Pet Insurance - Basic, Standard, Comprehensive and Comprehensive Plus Cover the subject of the Target Market Determination dated 15 November 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

***dealing*** has the meaning given by subsection 994A(1) of the Act.

***excluded conduct*** has the meaning given by subsection 994A(1) of the Act.

***exempted conduct*** means dealing in Everyday Pet Insurance - Basic, Standard, Comprehensive and Comprehensive Plus Cover the subject of the Target Market Determination dated 15 November 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

***general advice*** has the meaning given by section 766B of the Act.

***retail client*** has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023



**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*****RE:   Everyday Pet Insurance - Indoor Cat**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Everyday Pet Insurance - Indoor Cat the subject of the Target Market Determination dated 15 November 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

***dealing*** has the meaning given by subsection 994A(1) of the Act.

***excluded conduct*** has the meaning given by subsection 994A(1) of the Act.

***exempted conduct*** means dealing in Everyday Pet Insurance - Indoor Cat the subject of the Target Market Determination dated 15 November 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

***general advice*** has the meaning given by section 766B of the Act.

***retail client*** has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Guardian Pet Insurance - Bronze Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Guardian Pet Insurance - Bronze Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Guardian Pet Insurance - Bronze Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Guardian Pet Insurance - Silver, Gold and Platinum**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Guardian Pet Insurance - Silver, Gold and Platinum the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Guardian Pet Insurance - Silver, Gold and Platinum the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Guide Dogs Pet Insurance - Basic, Comprehensive and Premium Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Guide Dogs Pet Insurance - Basic, Comprehensive and Premium Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Guide Dogs Pet Insurance - Basic, Comprehensive and Premium Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023



**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*****RE: HCF Pet Insurance**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of HCF Pet Insurance the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

***dealing*** has the meaning given by subsection 994A(1) of the Act.

***excluded conduct*** has the meaning given by subsection 994A(1) of the Act.

***exempted conduct*** means dealing in HCF Pet Insurance the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

***general advice*** has the meaning given by section 766B of the Act.

***retail client*** has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
CORPORATIONS ACT 2001****RE: Kogan Pet Insurance - Indoor Cat Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Kogan Pet Insurance - Indoor Cat Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Kogan Pet Insurance - Indoor Cat Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Kogan Pet Insurance Pet Primary, Pet Value and Pet Luxury Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Kogan Pet Insurance Pet Primary, Pet Value and Pet Luxury Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Kogan Pet Insurance Pet Primary, Pet Value and Pet Luxury Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Manchester Unity Pet Insurance**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Manchester Unity Pet Insurance the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Manchester Unity Pet Insurance the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023



## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Medibank Pet Insurance**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Medibank Pet Insurance the subject of the Target Market Determination dated 1 February 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Medibank Pet Insurance the subject of the Target Market Determination dated 1 February 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Pet Insurance Australia - Accident Only Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Pet Insurance Australia - Accident Only Cover the subject of the Target Market Determination dated 8 May 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Pet Insurance Australia - Accident Only Cover the subject of the Target Market Determination dated 8 May 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Pet Insurance Australia - Comprehensive Cover and Major Medical Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Pet Insurance Australia - Comprehensive Cover and Major Medical Cover the subject of the Target Market Determination dated 8 May 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Pet Insurance Australia - Comprehensive Cover and Major Medical Cover the subject of the Target Market Determination dated 8 May 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Pet Insurance Australia - Pet Essentials Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Pet Insurance Australia - Pet Essentials Cover the subject of the Target Market Determination dated 8 May 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Pet Insurance Australia - Pet Essentials Cover the subject of the Target Market Determination dated 8 May 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023



## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Petbarn Insurance Core and Core Plus Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Petbarn Insurance Core and Core Plus Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Petbarn Insurance Core and Core Plus Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Petbarn Insurance Total Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Petbarn Insurance Total Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Petbarn Insurance Total Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
CORPORATIONS ACT 2001****RE: Petinsurance.com.au - Cover for Cats**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Petinsurance.com.au - Cover for Cats the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Petinsurance.com.au - Cover for Cats the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

Signed by s 22

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as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
CORPORATIONS ACT 2001****RE: Petinsurance.com.au - Cover for Dogs**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Petinsurance.com.au - Cover for Dogs the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Petinsurance.com.au - Cover for Dogs the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

Signed by s 22

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as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023



## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Petinsurance.com.au - Cover for Puppies**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Petinsurance.com.au - Cover for Puppies the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Petinsurance.com.au - Cover for Puppies the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Petinsurance.com.au - Indoor Cat Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Petinsurance.com.au - Indoor Cat Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Petinsurance.com.au - Indoor Cat Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Petinsurance.com.au Best in Show - Bronze Cover for Indoor Cat**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Petinsurance.com.au Best in Show - Bronze Cover for Indoor Cat the subject of the Target Market Determination dated 29 June 2022 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Petinsurance.com.au Best in Show - Bronze Cover for Indoor Cat the subject of the Target Market Determination dated 29 June 2022 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Petinsurance.com.au Best in Show - Gold and Platinum Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Petinsurance.com.au Best in Show - Gold and Platinum Cover the subject of the Target Market Determination dated 29 June 2022 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Petinsurance.com.au Best in Show - Gold and Platinum Cover the subject of the Target Market Determination dated 29 June 2022 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023



## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Petinsurance.com.au Best in Show - Silver Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Petinsurance.com.au Best in Show - Silver Cover the subject of the Target Market Determination dated 29 June 2022 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Petinsurance.com.au Best in Show - Silver Cover the subject of the Target Market Determination dated 29 June 2022 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
CORPORATIONS ACT 2001****RE: Pounce Pet Insurance - Basic Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Pounce Pet Insurance - Basic Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Pounce Pet Insurance - Basic Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

Signed by s 22

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as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
CORPORATIONS ACT 2001****RE: Pounce Pet Insurance - Indoor Cat Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Pounce Pet Insurance - Indoor Cat Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Pounce Pet Insurance - Indoor Cat Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
CORPORATIONS ACT 2001****RE: Pounce Pet Insurance - Standard and Premium Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Pounce Pet Insurance - Standard and Premium Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Pounce Pet Insurance - Standard and Premium Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023



## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Prime Pet Insurance - Regal Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Prime Pet Insurance - Regal Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Prime Pet Insurance - Regal Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Prime Pet Insurance - Royal, Imperial and Sovereign Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Prime Pet Insurance - Royal, Imperial and Sovereign Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Prime Pet Insurance - Royal, Imperial and Sovereign Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*

**RE: Real Pet Insurance - Accidental, Premium and Standard Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Real Pet Insurance - Accidental, Premium and Standard Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Real Pet Insurance - Accidental, Premium and Standard Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

## AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION

NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001***RE: Real Pet Insurance - Classic Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Real Pet Insurance - Classic Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Real Pet Insurance - Classic Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023



**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
CORPORATIONS ACT 2001**

**RE: RSPCA Pet Insurance - Basic, Economy, Ultimate and Ultimate Plus Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of RSPCA Pet Insurance - Basic, Economy, Ultimate and Ultimate Plus Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in RSPCA Pet Insurance - Basic, Economy, Ultimate and Ultimate Plus Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
*CORPORATIONS ACT 2001*****RE: RSPCA Pet Insurance General Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of RSPCA Pet Insurance General Cover the subject of the Target Market Determination dated 5 October 2021 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

***dealing*** has the meaning given by subsection 994A(1) of the Act.

***excluded conduct*** has the meaning given by subsection 994A(1) of the Act.

***exempted conduct*** means dealing in RSPCA Pet Insurance General Cover the subject of the Target Market Determination dated 5 October 2021 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

***general advice*** has the meaning given by section 766B of the Act.

***retail client*** has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
CORPORATIONS ACT 2001**

**RE: Seniors Pet Insurance - Basic Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Seniors Pet Insurance - Basic Cover the subject of the Target Market Determination dated 6 January 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Seniors Pet Insurance - Basic Cover the subject of the Target Market Determination dated 6 January 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

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Signed by s 22

as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023

**AUSTRALIAN SECURITIES AND INVESTMENTS COMMISSION****NOTICE OF REVOCATION OF ORDER  
SUBSECTIONS 994J(2) AND (4)  
CORPORATIONS ACT 2001**

**RE: Seniors Pet Insurance - Top, Essential and Accident Only Cover**

Under subsections 994J(2) and (4) of the *Corporations Act 2001* (**the Act**) the Australian Securities and Investments Commission revokes the interim order made under subsections 994J(2) and (4) of the Act on 28 June 2023 that the following specified conduct in relation to retail clients in respect of Seniors Pet Insurance - Top, Essential and Accident Only Cover the subject of the Target Market Determination dated 6 January 2023 (except excluded conduct and exempted conduct) must not be engaged in while the order is in force:

- (a) dealing; and
- (b) providing general advice.

**Interpretation**

*dealing* has the meaning given by subsection 994A(1) of the Act.

*excluded conduct* has the meaning given by subsection 994A(1) of the Act.

*exempted conduct* means dealing in Seniors Pet Insurance - Top, Essential and Accident Only Cover the subject of the Target Market Determination dated 6 January 2023 that consists of:

- (a) issuing the product to a retail client, where the retail client applied for the product before the date of the order; and
- (b) varying the product to renew, extend or reinstate the contract of insurance in relation to the product.

*general advice* has the meaning given by section 766B of the Act.

*retail client* has the meaning given by section 761A of the Act.

s 22

Signed by s 22

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as a delegate of the Australian Securities and Investments Commission

Dated: 29 June 2023