



**BY HAND**

Ref: 0261650\SMA0903314

30 April 2007

Australian Competition and Consumer Commission  
Level 14, 13 Grenfell Street  
Adelaide SA 5000

Norman Waterhouse  
Lawyers

Level 15  
45 Pirie Street Adelaide

GPO Box 639 Adelaide  
South Australia 5001

Telephone +61 8 8210 1200  
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[www.normans.com.au](http://www.normans.com.au)  
DX 397 Adelaide

Dear Sirs

**Exclusive Dealing Notification – CGU Insurance Ltd**

We act for CGU Insurance Ltd.

We enclose:

1. An Exclusive Dealing Notification relating to proposed third line forcing conduct; and
2. Our cheque for \$1,000 for the filing fee.

Please contact the writer if you have any queries.

Yours faithfully  
NORMAN WATERHOUSE

A handwritten signature in black ink, appearing to read "Shannon Adams".

Shannon Adams  
PARTNER

Direct Line: (08) 8210 1260 or 0411 129 192  
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## FORM G

Commonwealth of Australia

*Trade Practices Act 1974 – Sub-section 93(1)*

### EXCLUSIVE DEALING NOTIFICATION

To the Australian Competition and Consumer Commission:

Notice is hereby given, in accordance with sub-section 93(1) of the *Trade Practices Act 1974*, of particulars of conduct or of proposed conduct of a kind referred to in sub-section 47 (6) or (7) of that Act in which the person giving notice engages or proposes to engage.

1. (a) **Name of person giving notice:**

CGU Insurance Ltd ACN 004 478 371 ("CGU"). *N92898*

(b) **Short description of business carried on by that person:**

Provision of financial services in the form of general insurance products.

(c) **Address in Australia for service of documents on that person:**

c/- Shannon Adams  
Partner  
Norman Waterhouse  
Level 15, 45 Pirie Street  
Adelaide SA 5000

2. (a) **Description of the goods or services in relation to the supply or acquisition of which this notice relates:**

Building and contents insurance products and home loan products.

(b) **Description of the conduct or proposed conduct:**

***Background***

Savings and Loans Credit Union (S.A.) Ltd ACN 050 419 755 ('Savings & Loans') is an authorised deposit taking institution and a supplier of loan products.

Savings & Loans is an agent of CGU and in that capacity, but acting under its own Australian Financial Services licence, deals in CGU general insurance products by arranging for the issue of those products by CGU to customers of Savings & Loans.

***The conduct***

Savings and Loans proposes to run a special promotional campaign, for a limited period, in relation to home loans for first home buyers. It proposes to offer borrowers various special benefits including reduced or waived fees.

As part of the proposed campaign it is proposed that CGU will give any person who obtains a home loan from Savings and Loans, to which the promotional campaign applies, a discount of up to \$400.00 on what would otherwise be the first year's premium

payable to CGU for any home insurance which the person chooses to take out with CGU in connection with the property to which the loan relates. It is considered that this proposed conduct is conduct of a kind referred to in sub-section 47 (6) or (7) of the Act.

It is proposed that the promotional campaign will be conducted primarily by Savings and Loans sending letters to members who are potential borrowers. A draft of the proposed form of letter is attached. The availability of the offer will also be communicated verbally to members who attend at Savings & Loans branches.

***The public benefits of the conduct***

CGU submits that the following public benefits are likely to result from the conduct:

- It will encourage borrowers to take out adequate insurance cover.
- The conduct will result in lower insurance premiums being paid by the qualifying borrowers.

The conduct may encourage other financial services providers to offer similar benefits and may therefore encourage competition that is likely to benefit consumers.

***The public detriment of the conduct***

CGU submits that no public detriment would be likely to result from the conduct.

3. (a) **Class or classes of persons to which the conduct relates:**

Members of Savings and Loans.

(b) **Number of those persons-**

(i) **At present time:**

Approximately 170,000.

(ii) **Estimated within the next year:**

Approximately 180,000.

(c) **Where number of persons stated in item 3(b)(i) is less than 50, their names and addresses:**

Not applicable

4. **Name and address of person authorised by the person giving this notice to provide additional information in relation to this notice:**

Shannon Adams  
Partner  
Norman Waterhouse  
Level 15, 45 Pirie Street  
Adelaide SA 5000

Telephone: (08) 82101260  
Facsimile: (08) 8210 1234

Email: sadams@normans.com.au

Dated: 30th April 2007

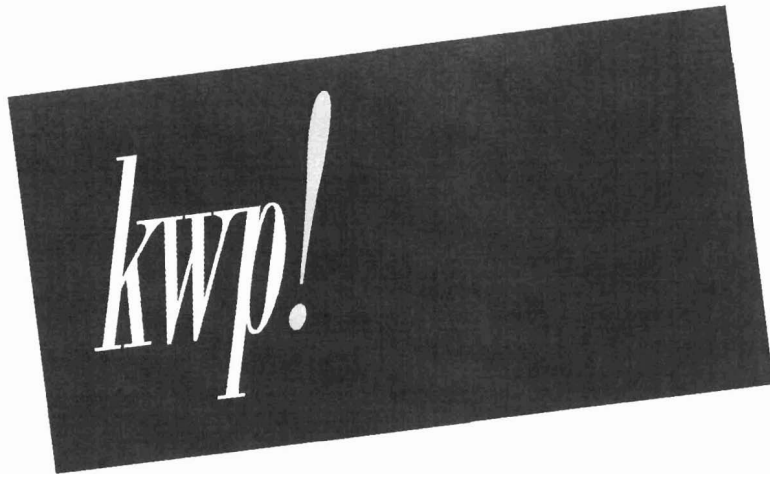
Signed by/on behalf of the applicant giving notice



(Signature)

**Shannon Adams**  
(Full Name)

**Partner, Norman Waterhouse**  
(Description)



## Press Copy

Group 1 letter

First home loan?

Call us first and get up to \$400 off your insurance.

Fill

<date>

<Ms. Sample A. Sample>

<123 Sample Street>

<Sampletown, VIC 1234>

Dear Ms. Sample,

If you're thinking of buying a new home now or in the future and you are a first home buyer, it can really pay to make Savings & Loans your first place to call for a home loan. Here's why:

- **Great benefits with whatever type of home loan suits you.** Whether you're after the certainty of fixed repayments or a great variable rate, you'll find we offer great benefits with all our home loans, including our Low Doc and Latitude line of credit.
- **Save up to \$400 off your home insurance.** If you're one of the first 100 first home buyers to have a home loan approved before 30 June 2007, you could save up to \$400 off your home insurance in the first year.

Who's it for?

**SAVINGS & LOANS**

What's it about?

**HOME LOANS**

Where will it run?

**MAIL**

Who wrote it?

**LT**

What's the key number?

**SAL 0138**

How big is it?

**DLX**

When will it appear?

What's the date?

**19/04/2007**

What version is this?

**3**



- **NO application fees** on home loans for first home buyers approved before 30 June 2007.
- **NO monthly fees** on standard home loans.
- **NO annual fees** on home loans.
- **Make smaller repayments or borrow more with terms up to 40 years.** According to Cannex, we're one of the first lenders to offer 40 year terms.
- **Talk to us about how best to use your First Home Owners Grant** and we'll do all the paperwork for you.
- **You don't need a deposit** with our Family Guarantee option, which allows an immediate family member to guarantee a set amount against their home.
- **Get a headstart** at auctions with two months pre-approval.
- **Save with free pre-settlement insurance** between signing the contract and settlement.

**Call <variable number> or visit your branch by 30 June, 2007.**

If you're looking for your first home loan, it pays to make Savings & Loans the first place you call.

To find out more or apply, call <variable number>, visit your Savings & Loans branch or have a Lending Specialist come to you. You can also request an appointment on our website at [savingsloans.com.au/homeloans](http://savingsloans.com.au/homeloans)

Yours sincerely,

(signed by Regional Manager)



**PS.** Not looking for a home loan right now? Register at **[savingsloans.com.au/special offers](https://www.savingsloans.com.au/special-offers)** now to ensure you're up to date with our special offers on home loans.

This offer is only available via our branches. It is not available via brokers. The offer is not available in conjunction with any other offers and no further discounts will apply. The minimum loan amount is \$150,000. Lending criteria apply. Some fees and charges, such as valuation fees and documentation fees, may be payable.

The offer in relation to insurance is only available in relation to pre-settlement insurance, building insurance or (if a strata property is purchased) contents insurance provided by CGU Insurance Ltd ABN 27 004 478 371 (CGU). The offer is to pay up to \$400 of the usual cost of your first year's premium for home insurance and to provide pre-settlement insurance for free. Product Disclosure Statements (PDS) for CGU insurance products are available from any branch of Savings & Loans or from CGU. You should consider the PDS for an insurance product before deciding to acquire or hold it.

If you do not wish to receive information or offers like this in the future, please call 13 11 82 or visit your nearest branch. You may receive a phone call from one of our consultants to discuss this offer further.