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22 May 2007

Mr Scott Gregson
General Manager
Adjudication Branch
Australian Competition and Consumer Commission
PO Box 1199
DICKSON ACT 2602

Dear Mr Gregson

GIO Taxi Voucher Notification

GIO General Limited ("GIO") is a member of the Suncorp Group of companies.

Proposed exclusive dealing

GIO proposes to engage in conduct that would constitute exclusive dealing within the meaning of section 47(6) and (7) of the *Trade Practices Act 1974 (Cth)* ("the Act"). GIO therefore wishes to notify the ACCC of this proposed conduct under section 93 of the Act.

I attach the following:

- completed Form G Notification; and
- a cheque in the sum of \$100 being the prescribed fee for the notification.

Summary of Proposed Conduct

GIO proposes to offer a taxi voucher to customers under policy of motor vehicle insurance if the customer acquires Repair Services from a Recommended Repairer. The purpose of the taxi voucher is to facilitate the customer's reasonable travel from the customer's home or place of employment to a GIO Assessing Centre or place of business of a Recommended Repairer to enable them to collect their vehicle upon completion of a repair.

If a customer chooses not to have their motor vehicle repaired by a Recommended Repairer, then the customer will not receive the taxi voucher.

GIO considers that the proposed conduct will have minimal impact on competition, but that the proposed conduct will lead to compelling public benefits, such as:

1. providing a benefit to customers who would not otherwise be able to enjoy the benefit;
2. assisting GIO to achieve greater business efficiencies in relation to the supply of motor vehicle insurance; and
3. promoting competition in the relevant market by encouraging competitors to offer similar benefits.

25 MAY 2007

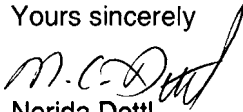
Confidentiality

No claim for confidentiality is made in relation to the attached notification.

Further queries

GIO is prepared to discuss their proposed conduct with the ACCC. Please contact us if the ACCC has any queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N. Dettl', written over the typed name.

Nerida Dettl
Principal Solicitor
Group Legal

encs.

Form G

Commonwealth of Australia

Trade Practices Act 1974 — subsection 93(1)

N92929

**EXCLUSIVE DEALING
NOTIFICATION**

To the Australian Competition and Consumer Commission:

Notice is hereby given, in accordance with subsection 93(1) of the *Trade Practices Act 1974*, of particulars of conduct or of proposed conduct of a kind referred to in subsection 47(2), (3), (4), (5), (6), or (7), or paragraph 47(8)(a), (b), or (c) or (9)(a), (b), (c), or (d), of that Act in which the person giving notice engages or proposes to engage.

(PLEASE READ DIRECTIONS AND NOTICE ON BACK OF FORM)

1 (a) Name of person giving notice:

GIO General Limited ACN 002 861 583 (**GIO**) (incorporating general insurance products underwritten by GIO for AMP GI Distribution Pty Ltd ACN 098 080 810, Honda Australia Pty Ltd ACN 004 759 611 and other entities from time to time).

(jointly and severally "the Applicant")

(See Direction 2 on the back of this Form)

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

The Applicant carries on the business of providing general insurance.

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

c/- Nerida Dettl
Principal Solicitor
Group Legal
Suncorp Group
Level 16
36 Wickham Terrace
BRISBANE QLD 4001

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

GIO provides motor vehicle insurance in New South Wales, the Australian Capital Territory, Victoria, Western Australia and the Northern Territory (also "the Product").

Recommended Repairers, and other repairers nominated by the Applicant on an *ad hoc* basis, (collectively called "Recommended Repairers"), supply goods and services in relation to the repair of motor vehicles ("Repair Services").

(b) Description of the conduct or proposed conduct:

The Applicant proposes to enter into an arrangement with Recommended Repairers such that the Applicant will:

- (a) give or allow or offer to give or allow a benefit (described below) in relation to the supply or proposed supply of the Product on the condition that the customer acquires Repair Services from a Recommended Repairer;
- (b) refuse to give or allow or offer to give or allow a benefit (described below) in relation to the supply of the Product for the reason that the customer has not acquired or has not agreed

to acquire Repair Services from a Recommended repairer.

Particulars of Proposed Conduct

The Applicant proposes to offer a taxi voucher to customers who elect to acquire Repair Services from a Recommended Repairer.

The taxi voucher will be used by customers to enable reasonable travel from the customer's home and/or place of employment to an Assessing Centre or place of business of a Recommended Repairer to collect their vehicle on completion of a repair.

BENEFIT TO PUBLIC

The Applicant does not force customers acquiring the Product to acquire Repair Services from Recommended Repairers.

If a relevant customer elects to acquire Repair Services from a Recommended Repairer, the customer will be entitled to the benefit (described above) in relation to the Product.

If a customer elects not to acquire Repair Services from a Recommended Repairer, the customer will not be able to take advantage of the benefit (described above) in relation to the Product.

The proposed conduct will be of benefit to the public as it will:

- Provide the benefit to customers who would not otherwise be able to enjoy the benefit;
- Assist the Applicant to achieve greater business efficiencies in relation to the supply of the Product to customers;
- Promote competition in the relevant markets by encouraging competitors to offer similar benefits.

The proposed conduct will not lessen competition in the market for the relevant Products as:

- Competition in the relevant markets is vigorous and there are many competitors who are able to provide the relevant Products;
- The Applicant does not have market power in any of the relevant markets; and
- The number of consumers potentially affected by the proposed conduct will not be significant compared to the total number of customers who acquire the relevant products.

The Applicant submits that the benefits of the proposed conduct as outlined, will outweigh any possible detriment considered to arise from the conduct.

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

Persons who have acquired and maintain the Product and persons who may acquire the Product.

(b) Number of those persons:

(i) At present time:

16000

(ii) Estimated within the next year:

18500

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

Not applicable

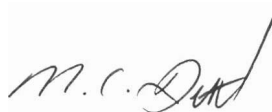
4 Name and address of person authorised by the applicant to provide additional information in relation to this notice:

Nerida Dettl
Principal Solicitor
Group Legal
Suncorp Group
Level 16
36 Wickham Terrace
BRISBANE QLD 4001

Phone: (07) 3835 5186
Fax: (07) 3031 2405
Email: nerida.dettl@suncorp.com.au

Signed on behalf of the person giving this notice:

Dated: 22 May 2007



(Signature)

Nerida Dettl

(Full Name)

Principal Solicitor, Suncorp Group

(Description)