Part VII Contracted Third-Party FAQ

Frequently Asked Questions

This FAQ Document contains information on the proposed transfer of Direct Line's general insurance business from U K Insurance Limited (**"UKIL"**) to Aviva Insurance Limited (**"AIL"**).

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Please read this FAQ Document and share it with any relevant members of your organisation or company.

If you have questions or feel that you may be adversely affected by the proposed transfer, you have the right to raise those questions and/or object. Details on how to do this are explained in **Section 4** of this guide. You do not need to take any action for the transfer to take place.

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How to get in touch:

A dedicated Part VII Contracts transfer team has been set up to handle your queries. You can get in touch with them through the contact details below.

Email:

Write to: AvivaSupplierCommunications@aviva.com

Need this information in a different format?

If you need this guide in large print, Braille, or audio format, please request it using the contact method above.

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Who are UKIL and AIL?

UKIL is a legal entity within the Direct Line Group, and since 1 July 2025, part of the Aviva Group.

UKIL underwrites insurance and breakdown cover for the following brands: Direct Line, Churchill, Privilege, Green Flag, Darwin and By Miles.

Insurance products have also been distributed through third parties: NatWest, Royal Bank of Scotland, Ulster Bank, Coutts, Virgin Money, Prudential, Sainsburys, Motability, Royal London, Tesco, Egg, Lloyds, Nationwide, Premier, Caravan and Motorhome Club, PSA Stellantis, VW Group, Intelligent Insurance, Simply Business and Confidas.

Aviva Insurance Limited (AIL) is a legal entity within the Aviva Group, that underwrites insurance services in the UK, Ireland and Canada.

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Section 1:

The proposed transfer

What is being proposed?

On 1 July 2025, Aviva plc purchased Direct Line Insurance Group Limited (including all the companies within such group including UKIL). UKIL is now part of the Aviva Group along with AIL. This means that there will be some changes to the way the combined business operates.

A transfer of policies currently underwritten by UKIL to AIL is proposed to take effect on 31 December 2026.

This transfer will follow a strict legal process known as a Part VII Transfer.

If the Part VII Transfer is approved by the Courts (see below), from 31 December 2026, policies and claims underwritten by UKIL will be transferred to and underwritten by AIL. Contracts, assets and liabilities of UKIL and its associated legal entities (such as DLIS*) will also transfer to other Aviva Group entities.

**DLIS means DL Insurance Services Limited*

How are affected persons protected?

The proposed transfer must follow a strict legal and regulatory process to make sure affected persons are treated fairly.

As part of this process:

- An Independent Expert, who isn't linked to either UKIL or AIL, has been appointed to assess the impact of the transfer on those people who may be affected by the proposed transfer, including interested third parties. They will prepare a report on the transfer, which is then shared with the regulators and the Court.
- The Prudential Regulation Authority (PRA) and the Financial Conduct Authority (FCA) will review the proposal.
- This guide and the transfer comply with the Financial Services and Markets Act 2000 (FSMA).
- The Jersey Financial Services Commission (JFSC) will also consider the proposed transfer and report their views to the Jersey Court for those customers who have taken out a policy in Jersey.

- For affected persons in the UK, before the transfer can proceed, approval is required from the High Court of Justice of England and Wales.
- For affected persons in Jersey, approval is required from the Royal Court of Jersey.
- As an affected company or organisation, you have the right to ask questions, make a complaint and/or raise an objection if you believe you may be adversely affected by the transfer.

More details about the above process can be found in **Section 3**. How to ask questions and/or raise an objection is outlined in **Section 4**.

Further details about the Independent Expert and their findings are included in **Section 7**.

When will the transfer take place?

The dates of the initial court hearings which gave us permission to write to you and provide information about the proposed transfer are set out below:

- High Court of Justice of England and Wales – 17 July
- Royal Court of Jersey – 22 July

The final hearing in the High Court of Justice of England and Wales to decide on whether the transfer can proceed is expected to take place on 15 December 2026 at the Rolls Building, 7 Rolls Buildings, Fetter Lane, London, EC4A 1NL.

The final hearing in the Royal Court of Jersey is expected to take place on 18 December 2026 at Royal Court House, Royal Square, St. Helier, Jersey, JE1 1JG.

If the transfer is approved, it is expected to take effect on **31 December 2026**.

The latest information on the transfer can be found on the website at https://www.aviva.co.uk/dlg-partvii/.

17 July 2026	From 27 July 2026	15 December 2026	31 December 2026
First hearing at the High Court of Justice of England and Wales, with the first hearing at the Royal Court of Jersey on 22 July 2026.	Transfer communicated to affected persons.	Final hearing at the High Court of Justice of England and Wales, with the final hearing at the Royal Court of Jersey on 18 December 2026.	Subject to court approval, your contract will be transferred to the relevant Aviva entity.

Will everyone receive an email or letter about the proposed transfer?

From July through to December, we are sending communications to anyone who may be affected by the proposed transfer. This includes policyholders, claimants, reinsurers and other impacted parties such as third party suppliers and insurance distributors, amongst others.

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Section 2:

Your contract(s)

Why have we received a Part VII letter/email about our contract(s)?

You have received this notification because your contract(s) are expected to transfer to another Aviva Group entity as part of the Part VII transfer.

Which of our contracts are in scope of the Part VII transfer?

If your contract is with UKIL, it is automatically included in the transfer. For contracts with other legal entities (such as DLIS), the names and details of those within the scope of the Transfer can be found in Schedule 1 of the Scheme Document, available on the Part VII website.

Our contract has expired or terminated. Why have we still received a Part VII notice?

If you have contractual obligations which survive termination or expiry of the relevant contract, you may still receive such a notice.

What will change for our contract(s) if the Part VII transfer goes ahead?

Unless we contact you separately, your contract(s) shall continue on the same terms with the only change being that the current Direct Line Group entity (such as UKIL or DLIS) shall be replaced with a relevant Aviva Group entity, such as AIL or ACS (Aviva Central Services UK Ltd) by operation of the Part VII Transfer. However, whilst no material changes are anticipated, we may contact you regarding administrative updates such as entity name or invoicing details.

Do we need to sign a novation, consent letter, or new contract?

No, the transfer will take effect by operation of law, so your contract(s) will transfer without the need for a novation, consent, or new agreement.

Will the Part VII transfer change how we invoice, get paid, or use procurement / P2P systems?

The Part VII transfer itself will only change the contracting entity. Any changes to invoicing, payment processes, or systems will be communicated separately through integration activities.

Will our relationship managers or contract contacts change because of the Part VII transfer?

Any changes to relationship management or operational contacts would arise from broader integration activity rather than the Part VII transfer itself. If such changes occur, you will be contacted separately.

Will we be charged any costs because of the Part VII transfer?

Aviva will not charge you for the Part VII transfer itself. Any reasonable and demonstrable costs directly arising from required changes will be considered by Aviva on a case-by-case basis. Contact <AvivaSupplierCommunications@aviva.com> if you would like to discuss such costs if they arise.

Section 3:

The transfer process

This section explains how the proposed transfer works, what happens next, and the role of the regulators and the Courts.

What is a Part VII Transfer?

The proposed transfer follows a strict legal and regulatory process known as a Part VII Transfer.

This is a well-established process used when insurance business moves from one insurer to another. It is designed to make sure that affected persons are treated fairly and that their interests are protected.

As part of the Part VII process, the proposed transfer must be reviewed by regulators and approved by the High Court of Justice of England and Wales before it can take place.

In Jersey, an insurance business transfer follows a formal legal process set out in the Insurance Business (Jersey) Law 1996 (the Jersey Insurance Law).

Where it is proposed to transfer insurance business in Jersey from one insurer to another, this is again a well-established process to make sure that affected persons in Jersey are treated fairly and that their interests are protected. Similar to the UK process, the proposed transfer must be reviewed by the regulator, in this case, the Jersey Financial Services Commission and an application made to the Royal Court of Jersey for an order sanctioning the transfer (the Jersey Transfer).

The Royal Court of Jersey will review the proposed scheme to ensure that affected persons' interests are properly protected before approving it. The Jersey Transfer cannot take place unless and until it is formally sanctioned by the Royal Court of Jersey.

How does the process protect affected persons?

The Part VII process includes several safeguards to protect affected persons, including:

- An independent review of the transfer by an Independent Expert.
- Review by the Prudential Regulation Authority (PRA), in consultation with the Financial Conduct Authority (FCA).
- Approval by the High Court of England and Wales.
- The right for affected persons to ask questions and/or raise objections if they believe they may be adversely affected.

In Jersey, the Jersey Transfer process includes several safeguards to protect affected persons, including:

- An independent review of the transfer by an Independent Expert.
- Oversight by the Jersey Financial Services Commission (JFSC).
- Approval by the Royal Court of Jersey.
- The right for affected persons to ask questions and/or raise objections if they believe they may be adversely affected.

Who is the Independent Expert?

The Independent Expert is Charl Cronje. Mr Cronje is a Partner and a qualified actuary at Lane Clark and Peacock (LCP), a leading independent actuarial and financial consulting firm.

His appointment has been approved by the Prudential Regulation Authority (PRA), in consultation with the Financial Conduct Authority (FCA).

An actuary is a professionally qualified person with wide ranging, in-depth knowledge of the insurance industry. They can use their skills to assess the likely impact of changes on insurers and affected persons.

The Independent Expert is independent of both UKIL and AIL and has a professional obligation to remain impartial.

What does the Independent Expert do?

The Independent Expert's role is to assess the likely effect of the proposed transfer on affected persons, including:

- the ability of the insurer to meet its obligations (e.g. continue to properly administer the policies it underwrites and pay claims); and
- the standard of service affected persons receive.

The Independent Expert reviews detailed financial, operational, and regulatory information before reaching their conclusions.

Can I read the Independent Expert's Report?

Yes, you can:

- read a summary of the Independent Expert's findings in this guide in **Section 7**
- view the full Independent Expert's Report on the https://www.aviva.co.uk/dlg-partvii/.

- or request a paper copy, free of charge, using the contact details in **Section 4**

The Independent Expert will also prepare a supplementary report before the final Court hearings. This will consider whether anything has changed since their Report that could impact affected persons.

The supplementary report will be made available on the website before the final hearings.

How is the Independent Expert's Report used?

The Independent Expert's Report is provided to:

- the Prudential Regulation Authority (PRA)
- the Financial Conduct Authority (FCA)
- the Jersey Financial Services Commission (JFSC)
- the High Court of Justice of England and Wales
- the Royal Court of Jersey

The Courts will take the Independent Expert's findings into account, along with any objections raised by affected persons, before deciding whether to approve the proposed transfer.

What role do the regulators play?

The proposed transfer is reviewed by the following insurance regulators:

- The Prudential Regulation Authority (PRA), which focuses on the financial strength of insurers.
- The Financial Conduct Authority (FCA), which focuses on how customers are treated.

The regulators review the proposed transfer. They will both ordinarily provide the High Court with reports containing their views on the transfer, and whether or not they object to it.

The Jersey aspects of the proposed transfer are reviewed by the Jersey Financial Services Commission (JFSC) which focuses on how customers are treated as a result of the transfer.

What is the legal notice?

The legal notice sets out the fact that U K Insurance Limited (UKIL) and Aviva Insurance Limited (AIL) have made applications to the High Court of Justice of England and Wales under Part VII of the Financial Services and Markets Act, 2000 and the Royal Court of Jersey under the Insurance Business (Jersey) Law 1996.

The applications ask the Courts to approve a scheme to transfer the general insurance business underwritten by UKIL to AIL (the Scheme), including relevant contracts which may transfer to AIL or ACS.

Who has made the application?

The application has been made jointly by:

- U K Insurance Limited, and
- Aviva Insurance Limited

Both companies are authorised and regulated insurers in the UK.

Where can I see all the legal documents?

Copies of the following documents will be available on the website. You can also request printed copies, free of charge:

- the full Scheme document
- the Independent Expert's Report
- the Independent Expert's Supplementary Report
- other documents relevant to the proposed transfer

Details of how to access these documents are provided in **Section 5 - How to find out more.**

What will the High Court of Justice for England and Wales and the Royal Court of Jersey consider?

The Courts will consider whether it is appropriate to approve the proposed transfer.

In doing so, the Courts will take the following into account:

- the terms of the Scheme
- the report of the Independent Expert
- the views of the Prudential Regulation Authority (PRA) and the Financial Conduct Authority (FCA) in the UK and the Jersey Financial Services Commission (JFSC) in Jersey; and
- any objections or representations raised by affected persons or other interested parties

What happens at the Court hearings?

Before the transfer can go ahead, it must be approved by the Courts.

At the final hearing, the Courts will:

- Review the evidence relating to the proposed transfer
- Consider the Independent Expert's report
- Consider the opinion of the PRA and FCA and the JFSC (in Jersey)
- Take into account any objections or concerns raised by affected persons

If the Courts are satisfied that the transfer is fair and appropriate, they will separately approve the transfer.

How can I make representations to the Courts?

If you believe you may be adversely affected by the proposed transfer, you have the right to make representations to the Courts.

You can do this by:

- contacting the dedicated Part VII Contracts transfer team using the details provided in Section 4 of the guide, or
- attending the Court hearings in person, or
- arranging for a legal representative to attend on your behalf

You do not need to attend the Court hearings to raise a concern or objection.

Further details on how to object are set out in **Section 4 - How to ask questions and/or object.**

Can I attend the Court hearings?

Yes. You can attend the High Court or Royal Court of Jersey hearings in person if you wish. You can find full details on how to do this on the website once details have been confirmed.

If you have an objection, you can raise it at the final High Court hearing, or a legal representative can present your objection for you.

For policies linked to Jersey, you can attend the Royal Court of Jersey hearings in person or through a legal representative. You can also make written representations direct to the Royal Court of Jersey.

However, you do not need to attend the Court hearings in person to raise a question and/or object to the proposed transfer. See **Section 4** for details on how to make an objection.

When and where will the hearings take place?

For business carried out in the UK the final hearing is expected to take place at:

The High Court of Justice of England and Wales

Rolls Building

7 Rolls Buildings

Fetter Lane

London

EC4A 1NL

The hearing is expected to take place on **15 December 2026**.

For business carried out in or from Jersey, a separate application has been made to the Royal Court of Jersey, which must approve the transfer. The final hearing is expected to take place at:

The Royal Court of Jersey

Royal Court House

Royal Square

St. Helier

Jersey

JE1 1JG

The hearing is expected to take place on **18 December 2026**.

What is the legal process for the proposed transfer in Scotland?

The proposed transfer will follow a strict legal process under Part VII of the Financial Services and Markets Act 2000. Under this Act, as UKIL and AIL have a registered office in two different jurisdictions in the UK, the application for Court approval of the proposed transfer may be made to the relevant court in either jurisdiction. Therefore, we are applying to the High Court of Justice of England and Wales and there is no requirement to take any separate steps in Scotland in relation to the proposed transfer.

When would the proposed transfer happen?

If the transfer is approved by the Courts, it is expected to take effect on 31 December 2026. From that day onwards, the Aviva contracting entity on your contract(s) will be as per your notification letter. The mapping of contracting entities is also available within Schedule 1, Part A of the Scheme Document.

We will keep the latest information about hearing dates and the outcome of the process available on the following website https://www.aviva.co.uk/dlg-partvii/.

What happens if the transfer is approved?

The following will take place:

- All policies underwritten by UKIL that are included in the transfer will move to AIL.
- From the transfer date, your contract will transfer to the stated legal entity in your notification letter and Schedule 1, Part A of the Scheme Document.

What if the Courts don't approve the transfer?

If the High Court doesn't approve the Transfer; there will be no transfer and the contract(s) proposed to transfer will remain with the current Direct Line Group contracting entity.

If the Jersey Court doesn't approve the transfer of the business carried on in Jersey, then it will not transfer and all Jersey policies proposed to be transferred will remain with UKIL. The outcome of the Jersey Court hearing will not, however, affect the transfer of the contracts.

Will there be a vote on the proposed transfer?

No. The proposed transfer is subject to the approval of the High Court of Justice of England and Wales and the Royal Court of Jersey and is not subject to a vote of affected persons or other interested parties.

However, if you think you may be adversely affected by the proposed transfer, you have the right to make an objection, the full details of which are set out in **Section 4.**

Can I choose not to transfer my contract?

No. The legal process following doesn't allow for interested parties to opt out of the proposed transfer.

However, as explained in **Section 1,** you're protected by a rigorous legal process and have the right to object to the proposed transfer if you think you may be adversely affected by it.

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Section 4:

How to ask questions or object

If you have concerns about the proposed transfer, this section explains your right to ask questions and/or raise an objection, and how to do so.

Do I have the right to object?

Yes. You have the right to raise an objection if you believe the proposed transfer may adversely affect you.

You can object to the proposed transfer by letting the Part VII Contracts transfer team know the reason(s) for your objection and why you feel you may be adversely impacted. We will follow up any objections in writing explaining the outcome of the court hearing.

However, you are not required to contact the Part VII Contracts transfer team in order to make an objection.

Asking a question or raising an objection will not affect your contractual rights or the ongoing operation of services.

What does “adversely affected” mean?

This means that you believe the proposed transfer could have a negative impact on you as an interested party.

For example, this could relate to:

- the ability of the insurer to meet its obligations (e.g. continue to properly administer the policies it underwrites and pay claims)
- the standard of service affected persons receive

As part of the Part VII process, all objections raised to the Part VII Contracts transfer team will be notified to the PRA, the FCA, Independent Expert and the Courts. The Courts will consider whether any affected persons would be adversely impacted before deciding whether the transfer can go ahead.

How can I raise a question or object?

If you have questions or would like to raise an objection, you can do so by contacting the dedicated Part VII Contracts transfer team using the mailbox below. For those that have received a separate email or letter regarding the transfer, please include the contract(s) you are referencing and the organisation or company you represent when making an objection.

Email:

Write to: AvivaSupplierCommunications@aviva.com

Your questions or concerns will be received by the dedicated Part VII Contracts transfer team as part of the transfer process.

You can also raise an objection at the final High Court hearing in person, or a representative can present an objection on your behalf without having to notify Aviva.

If your contract forms part of the business carried out in Jersey and you consider you may be adversely affected by the proposed transfer, you have the right to raise an objection at the final Jersey Court hearing, or a legal representative can present an objection on your behalf.

You can also make written representations direct to the High Court or the Jersey Court, as applicable. For UK, Guernsey, and Isle of Man policyholders, please send your letter to:

The High Court, Rolls Building, 7 Rolls Buildings, Fetter Lane,

London, EC4A 1NL

For Jersey policyholders, please send your letter to:

The Royal Court of Jersey, Royal Court House, Royal Square, St Helier,

Jersey, JE1 1JG

Please include **U K Insurance Limited Transfer** as a reference in your correspondence. Whilst there is no need to notify us of an objection, we would be grateful if you could also send a copy to us via email at AvivaSupplierCommunications@aviva.com to help us be aware of and consider any concerns raised.

Is there a deadline for raising concerns or objections?

If you wish to raise a concern or objection, please do so as soon as possible.

This gives sufficient time to:

- consider your concerns
- respond where appropriate
- provide guidance if you wish to attend a Court hearing

You can still raise an objection up until the final Court hearing date, but raising it earlier helps ensure it can be properly considered.

What happens after I raise an objection?

All objections are shared with the relevant bodies below:

- the Independent Expert
- the Prudential Regulation Authority (PRA)
- the Financial Conduct Authority (FCA)
- the Jersey Financial Services Commission (JFSC)
- the High Court of Justice of England and Wales
- the Royal Court of Jersey

The relevant Courts will take all objections into account before deciding whether to approve the proposed transfer.

If the relevant Courts approve the transfer, your contract will move to the contracting entity on your notification letter and Schedule 1, Part A of the Scheme Document on the transfer date.

If the High Court doesn't approve the Transfer; there will be no transfer and the contract(s) proposed to transfer will remain with the current Direct Line Group contracting entity.

If the Jersey Court doesn't approve the transfer of the business carried on in Jersey, then it will not transfer and all Jersey policies proposed to be transferred will remain with UKIL. The outcome of the Jersey Court hearing will not affect the transfer of the other policies and/or contracts.

Copies of all correspondence which forms part of an objection will be passed on to the PRA, FCA, the Independent Expert and the High Court of Justice of England and Wales and the Royal Court of Jersey for consideration. This means that any correspondence that forms part of your objection will be part of the relevant Court process which will be accessible to the public. By submitting an objection to the transfer, you consent that your objection can be shared with the PRA, the FCA, the Independent Expert and the Courts.

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Section 5:

How to find out more

It's understandable that you may want more information about the proposed transfer or would like to explore the details in more depth.

This section explains where you can find further information and how to get in touch if you have questions.

Where can I find more information?

You can find full details about the proposed transfer, including key dates and documents, on the dedicated transfer website, https://www.aviva.co.uk/dlg-partvii/.

The website includes:

- the policyholder Transfer Guide and any additional FAQs
- a summary of the Independent Expert's Report and the report in full
- updates on Court dates and the progress of the transfer
- the Scheme document

This information will be kept up to date as the transfer process continues.

You can also read a summary of the Independent Expert's findings in **Section 7** of this guide. Paper copies of the full initial and supplementary reports can be requested using the contact details in Section 4 of this guide.

What if I have further questions?

If you want to know more about the proposed transfer or would like to discuss any concerns, you can contact the dedicated Part VII Contracts transfer team via the mailbox provided within this document and your notification letter.

Will you contact me again about the transfer?

There is no plan to send further separate communications about the proposed transfer.

Any important updates, including the outcome of the Court process or changes to key dates, will be published on the following website https://www.aviva.co.uk/dlg-partvii/.

If you're happy with the proposed transfer, you don't need to do anything.

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Section 6:

Summary of the terms of the Scheme

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Section 7:

Summary of the Independent Expert's Report

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Section 8:

Legal notice

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