

**Voluntary Application for Imposition of Requirement**

**MONEYSUPERMARKET.COM FINANCIAL GROUP LIMITED**

**FRN: 303190**

**To: The Financial Conduct Authority (“the FCA”)**

**FAO: Simon Green**

Moneysupermarket.com Financial Group Limited (“MSM”), as an authorised person with a permission granted under Part 4A of the Financial Services and Markets Act 2000, hereby applies to the FCA for the imposition of the requirements set out in the Schedule below.

**Signed by:** .....

Peter Plumb  
For and on behalf of Moneysupermarket.com Financial Group Limited

**Date:** .....

**SCHEDULE**

**Part A**

**1. General**

- 1.1 Part A of this Schedule sets out the terms of requirements to be imposed on MSM with MSM’s agreement with effect from 23 December 2013.
- 1.2 The FCA has informed MSM that it considers that certain of MSM’s advertisements, in the form they were run between 11 August 2013 and 28 October 2013 and which formed part of a wider campaign, were capable of more than one interpretation by consumers and consequently that they did not meet fully the FCA’s standards set out in [Principle 7 of the FCA’s Principles for Businesses](#). This was in the context of these advertisements being short videos where a combination of images, voiceover and clarifying wording (see Part B of this Schedule for further details) meant that viewers might not be able to absorb all the relevant information. The consequence was that the FCA has concerns that, taken as a whole, these advertisements created the impression that MSM was cheaper than other leading comparison sites more than 50% of the time when in fact, based on MSM’s survey data, it was cheaper than the competitors in question around 34% of the time with its next competitor being cheapest around 21% of the time. After discussions with the FCA, MSM has agreed not to broadcast or publish the advertisements in the same form in the future (details of the stills and voiceover from those advertisements appear in Part B of this Schedule).

**2. Requirements**

- 2.1 MSM agrees and is required to publish the following statement on its website for four weeks from the date of this requirement displayed in a prominent manner on its Home and Car Insurance pages “*The*

*Financial Conduct Authority ('FCA') considers our recent advertising campaign did not fully meet the standards that they expect for such advertisements. The FCA is concerned that the adverts created an incorrect overall impression that MoneySuperMarket is cheaper than other leading comparison sites more than 50% of the time”.*

## **SCHEDULE Part B**

### **Example advertisement 1**

*Voiceover detail:* BILL HERE JUST SAVED £304 ON HIS CAR INSURANCE AT MONEY SUPERMARKET AND NOW FEELS SO GOOD HE THINKS HE CAN RUN WITH WOLVES. THERE ARE NO WOLVES IN CROYDON. MALCOLM LET'S RUN. LIKE BILL MORE PEOPLE GOT CHEAPER CAR INSURANCE QUOTES AT MONEY SUPERMARKET THAN AT ANY LEADING PRICE COMPARISON SITE. BILL YOU'RE SO MONEY SUPERMARKET





**Example advertisement 2**

Voiceover detail: MORE PEOPLE GOT CHEAPER CAR INSURANCE QUOTES AT MONEY SUPERMARKET THAN AT ANY OTHER LEADING COMPARISON SITE. THAT'S SO MONEY SUPERMARKET.



**ANNEX 2**

**Printouts of what home and car insurance pages will look like.**

**Required text from paragraph 1(b) to be inserted in highlighted boxes**

**Helping British households make the most of their money**  
**Save up to:**

- Car Insurance £400<sup>†</sup>
- Home Insurance £200<sup>†</sup>
- Credit Cards £250<sup>†</sup>
- Energy £240<sup>†</sup>
- Loans £99<sup>†</sup>
- Savings £300<sup>†</sup>
- Holidays £250<sup>†</sup>
- Travel Insurance £49<sup>†</sup>

**ENERGY TAKE 5 MINS TO SAVE £240**

For verification on our TV adverts please click here



**Compare all our products to save more** | **Latest money-saving news and videos** | **Popular products**


<p><b>£ Money</b></p> <ul style="list-style-type: none"> <li>Credit Cards</li> <li>Loans</li> <li>Savings Accounts</li> <li>Mortgages</li> <li>Current Accounts</li> <li>Debt</li> <li>Cash ISAs</li> <li>Stocks and Shares ISAs</li> <li>Credit Report</li> <li>Travel Money</li> <li>Prepaid cards</li> <li>Business Finance</li> <li>Share Dealing</li> <li>International Money Transfers</li> <li>International Bank Accounts</li> </ul>	<p><b>☔ Insurance</b></p> <ul style="list-style-type: none"> <li>Car Insurance</li> <li>Home Insurance</li> <li>Travel Insurance</li> <li>Life Insurance</li> <li>Public Liability Insurance</li> <li>Landlord Insurance</li> <li>Pet Insurance</li> <li>Van Insurance</li> <li>Motorbike Insurance</li> <li>Business Insurance</li> <li>Caravan Insurance</li> <li>Over 50's Life Insurance</li> <li>Holiday Home Insurance</li> <li>Payment Protection</li> <li>Mortgage Protection</li> <li>Health Insurance</li> </ul>	<p><b>🗳️ Travel</b></p> <ul style="list-style-type: none"> <li>Flights</li> <li>Hotels</li> <li>Holidays</li> <li>Car Hire Insurance</li> <li>Car Hire</li> <li>Train Tickets</li> <li>Cruises</li> <li>Airport Transfers</li> <li>Airport Parking</li> <li>City Breaks</li> </ul>	<p><b>💡 Energy</b></p> <ul style="list-style-type: none"> <li>Boiler Cover</li> <li>Business Energy</li> </ul> <p><b>📶 Broadband</b></p> <ul style="list-style-type: none"> <li>Broadband Speed Test</li> </ul> <p><b>📱 Mobile Phones</b></p>	<p><b>🛒 Shopping</b></p> <ul style="list-style-type: none"> <li>LCD TVs</li> <li>MP3 Players</li> <li>Laptops</li> </ul> <p><b>🚗 Motoring</b></p> <ul style="list-style-type: none"> <li>Car Breakdown</li> <li>Van Breakdown</li> <li>Motorbike Breakdown</li> <li>New Car Prices</li> <li>Car Leasing Plans</li> <li>Car Reviews</li> <li>Vehicle Checks</li> <li>Car Warranty</li> <li>Van Warranty</li> </ul>
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<sup>†</sup> Car Insurance: 25% of consumers could save up to £459.25 (exc legal), Consumer Intelligence Aug 2013; Home Insurance: 10% of consumers could save up to £200.18 (exc legal), Consumer Intelligence Aug 2013; Energy: Up to 10% can save at least £244.64, MoneySuperMarket data based on sales June 2013; Credit Cards: Save on average £265.81 based on best balance transfer card from MoneySupermarket vs. market average rate of 17.87% (Source BoE), with average balance transfer of £2201 (Source BBA). Min repayment of 2.5% over 12 months. Aug 2013; Loans: Save on average £99 per year, based on MoneySuperMarket best buy loan vs. market average loan rate of 10.11% (Source BoE). Loan of £5000 over a term of 5 years. Aug 2013; Savings: Earn an extra £329.99 in interest over 12 months, based on best easy access savings rate from MoneySuperMarket vs. average interest rate of 0.44% (Source BoE). Average balance of £26,189.68. Aug 2013; Travel Insurance: Save £49.55 based on a couple aged 30 taking single trip cover for 2 weeks to the USA. Cheapest price available from MoneySuperMarket vs. the average of premiums returned of £73.29. Jul 2013; Holidays: Saving based on customer holiday searches on TravelSupermarket on 10th October 2013 for our top 40 destinations comparing like for like holidays from different holiday companies. 79% of customers had the opportunity to save on average £279.72.



**Car Insurance**  
**Compare cheap Car Insurance quotes online**

First time here? **Get a new quote** or Been here before? **Retrieve quotes**



Thanks for being on the ball & doing the leg work for me. I hate sorting out car insurance with a passion, so the email with the renewal information has really taken away the pain this year.

**Sara Vaughan**  
 Bishops Stortford  
 30 October 2013  
 ★★★★★

First time using the site. Father got his home insurance on here last week and was better than half price compared to his bank. I just got a quote for car insurance and again better than half price, saving me £300.

**Jeremy Carpenter**  
 Swindon  
 29 October 2013  
 ★★★★★

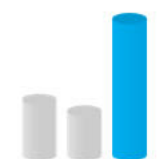


**Why use MoneySuperMarket**


- Latest motoring news
- Young drivers
- Family driving
- Women's car insurance
- Motor enthusiasts
- Guides

**MoneySuperMarket can find you a better deal**


Times are tough so it's more important than ever not to pay over the odds for your car insurance. But whether you're a brand new driver fighting against eye-wateringly high premiums or an experienced motorist discovering loyalty doesn't pay, you're in the right place at MoneySuperMarket to find the best deal for you.




Our research tells us that 99% of Britons saved on the cost of their car insurance when they used MoneySuperMarket\*\*



On average, drivers who use MoneySuperMarket save £300 on their car insurance renewal quote\*



MoneySuperMarket is the UK's #1 price comparison website. We are 100% independent



You can compare over 139 car insurance quotes in less than five minutes, making sure you get the best deal\*\*\*

**Important information**

Here's some important information about the services MoneySupermarket provides. Please read and retain for your own records.

> [About our service](#)

MoneySupermarket is rated 4.0/5 based on 29 reviews from the last 12 months. [Read our reviews.](#)

Neil Oliver, Telford wrote on Oct 31, 2013 ★★★★★

I found it very easy to install my details, the help to answer the questions was good. I will use this again for my car insurance.



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You can rest assured that the information you supply is encrypted and cannot be read by anyone else. We are committed to protecting your privacy. Read our [Privacy Policy](#) and shop online with confidence.