IFRS 17 – Latest Developments

DUBLIN SEMINAR

12 NOVEMBER 2018

The views expressed in this presentation are those of the presenter, and not those of the presenter's employer. Nothing in this presentation is intended to represent a professional opinion or be an interpretation of actuarial standards of practice. This presentation is intended solely for educational purposes and presents information of a general nature. It is not intended to guide or determine any specific individual situation and persons should consult qualified professionals before taking specific actions. Neither the presenter nor the presenter's employer shall have any responsibility or liability to any person or entity with respect to damages alleged to have been caused directly or indirectly by the content of this presentation.



Today's speakers

Andrew Kay Dublin



Amritpal Khangura
 Life Technology
 Solutions (London)



Eamon ComerfordDublin



William Hines Boston





Today's agenda

- 1. Industry readiness & EFRAG update
- 2. Latest news from the TRG
- 3. Emerging market practice and practical considerations

COFFEE BREAK

- 4. IFRS 17 data and technology considerations
- 5. Q&A Panel Discussion

Drinks / Canapés reception

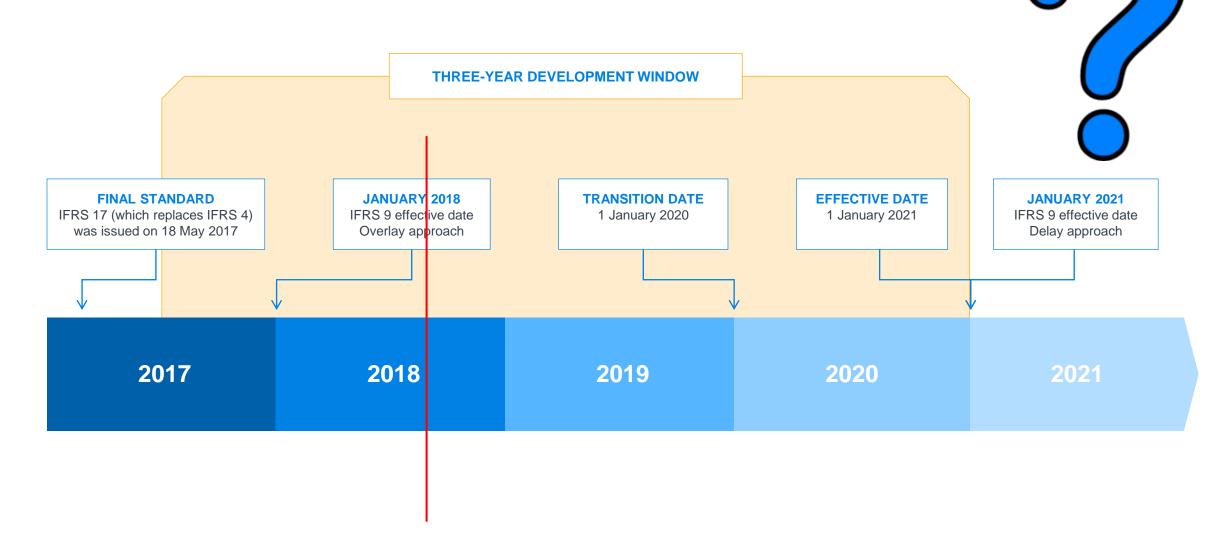


Introduction

Andrew Kay
Dublin



Timelines for IFRS 17 and IFRS 9





Initial Calibration of General Model

PV of Premium

PV of Benefit and Expense CFs

Contractual Service Margin

RA

Risk Adjustment

Present Value of Best Estimate of future cash flows

Represents unearned profit to be recognised as the company provides the services in the future.

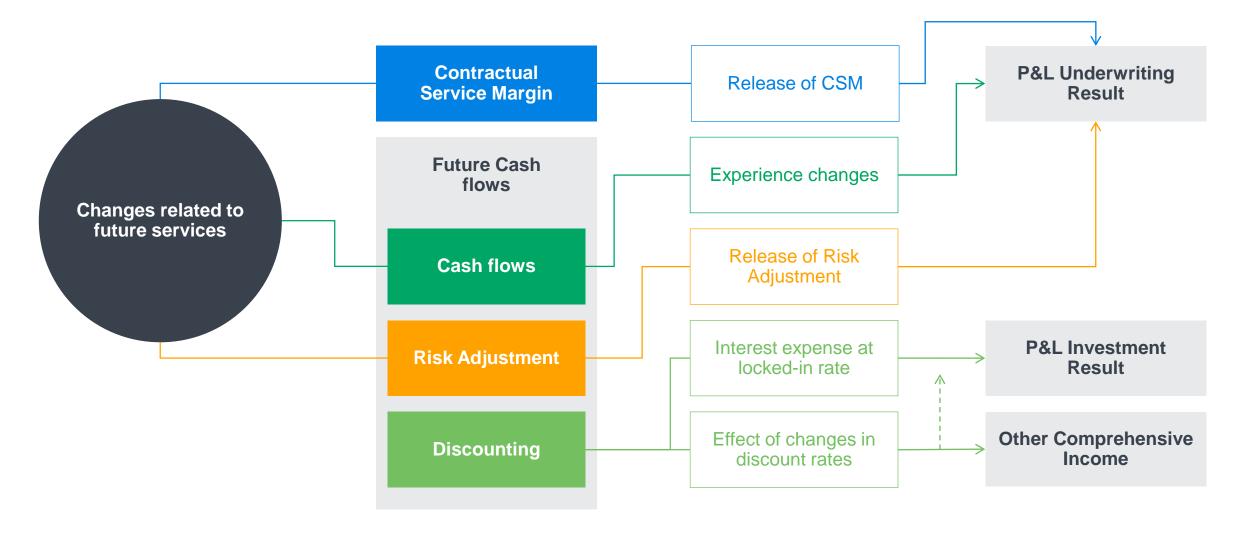
Adjustment equal to entity's required compensation for bearing uncertainty in underlying cash flows from non-financial risk.

Present value of best estimate cash flows to fulfill the contract within the contract boundary; discounted at rates that reflect characteristics of the liability including timing, currency and liquidity.

Fulfilment Cash Flows (FCF)



Subsequent Measurement & Impact on P&L





What's been happening?

IFRS 17 implementations

- Impact assessment
- Data gathering
- Assumptions
- Methodology
- Transition
- Systems and modelling

EFRAG

- Briefing papers
 (transition,
 reinsurance, CSM
 release,
 aggregation)
- Case studies, surveys
- Report planned for Q4 2018

TRG

- Unbundling
- Contract boundaries
- Acquisition expenses
- Coverage units
- Risk Adjustment
-



EFRAG update

Draft Endorsement Advice

European Financial Reporting Advisory Group

- Prepared various papers covering aspects of European public good that will form part of the endorsement advice on IFRS 17
 - Potential impact on insurance markets
 - Financial stability
 - Long term investment
 - Costs and benefits of IFRS 17
- Papers broadly positive on IFRS 17
- 93% of industry respondents to a global survey think that the benefits of IFRS 17 will outweigh the costs



Issues identified by EFRAG

European Financial Reporting Advisory Group

 Key outcome was a letter to the IASB, highlighting six areas that the EFRAG Board thinks "merit further consideration by the IASB":

CSM Acquisition costs Reinsurance amortisation Level of Balance sheet Transition aggregation presentation



Other issues noted by EFRAG

Measurement

Operational complexity

Implementation Timelines

- Interpretation
- Resources
- IT solutions



Timeline debate

Industry

(CFO Forum, Insurance Europe, Global)

- Industry concerns that need to be addressed technical, operational, systems
- A 2-year delay is required no expectation of slowing of implementation projects

ESA's (ESMA, EBA, EIOPA)

- IFRS 4 issued in 2005 was a temporary measure
- Inconsistent accounting practices, does not facilitate transparent and comparable accounts
- Necessary for financial stability, integration
- Caution against further delays

EFRAG

- Conducted significant outreach with constituents, who have raised concerns
- Identified topics that merit further consideration by the IASB



IASB response

Board meeting papers

October paper

- Noted it would consider whether industry concerns indicate the need for changes
- Criteria should not:
 - Lose useful information
 - Disrupt implementation processes

November paper

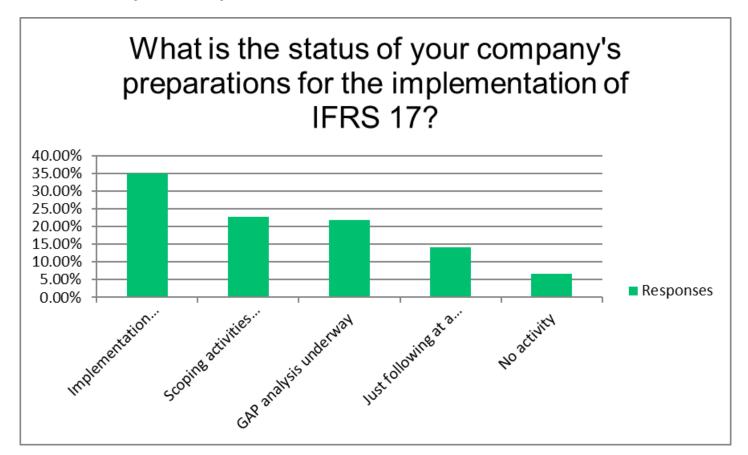
- Should the effective date be deferred to 1 Jan 2022?
- If so, should the IFRS 9 exemption be amended?



Industy Readiness

Milliman Global Survey

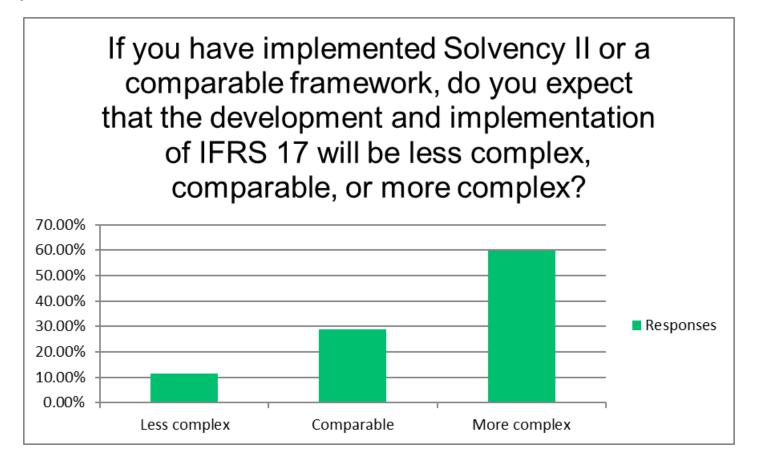
Readiness



- For those in implementation phase:
 - Further ahead on assumptions and methodology
 - Followed by actuarial modelling and IT, data quality, accounting systems
 - Lots of work to do on: transition, reporting, governance, strategy

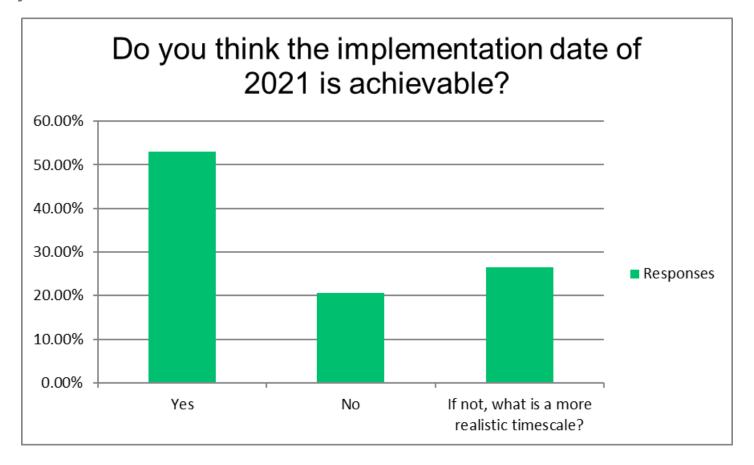


How complex?



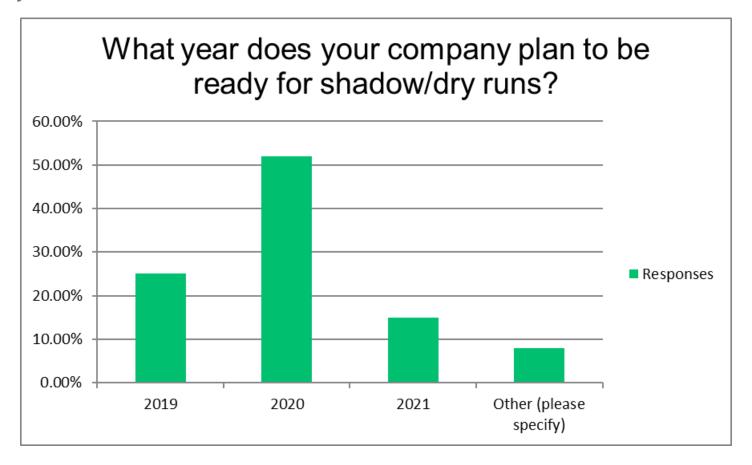


Timeline?



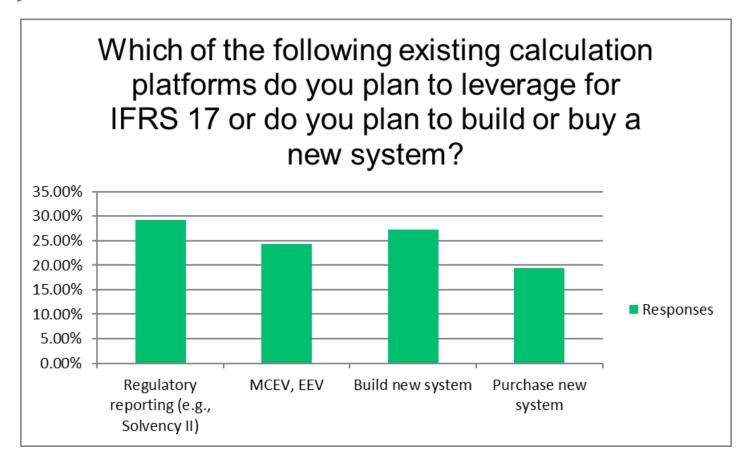


Dry runs?





Systems?





IFRS 17 Development Roadmap









Mobilisation stage

Solution design - end-toend business and solution architecture design and

Development and Implementation stage

Parallel Run / Reporting

Initial planning – impact assessment, resources. operation, budget planning, etc. determine changes required

Solution design stage

System development kickoff – perform implementation planning e.g. scope of work, timeline, resources

Dry run – initial results production

IFRS 17 requirements (Methodology) - conduct internal training or outsource (advisory services)

System selection and resources planning assessing capability and capacity

development solution/resource

outsource, internal customisation

/ enhancement or purchase new

to handle new IFRS17

planning e.g. in-house or

system (multiple vendors

selection).

requirement, system

refinement

Parallel run reporting (2020)

Post results refinement

Gap analysis - end-to-end business gap analysis e.g. technical, data, system, financial and operation gap analysis with pre-lim financial and operation impact assessment

Implementation – data gap refinement and system transformation or existing model



Milliman IFRS 17 Readiness Assessment Tool

IFRS 17 Readiness Assessment Tool for XYZ

| Summary | | % of questions completed | IFRS 17 Score |
|-------------------------|------------------------|--------------------------|----------------|
| General | Background | 80% | Not applicable |
| | Project management | 75% | Not applicable |
| Valuation | Methodology | 72% | 4.6 |
| | <u>Assumptions</u> | 84% | 3.2 |
| | <u>Transition</u> | 78% | 2.8 |
| | | | |
| Governance and Strategy | Governance | 84% | 2.4 |
| | Data Quality | 52% | 1.2 |
| | Strategic Impacts | 81% | 4.1 |
| | | | |
| Reporting and Analysis | Reporting and Analysis | 75% | 1.7 |
| | | | |
| Other | Actuarial Modelling | 62% | 3.3 |
| | IT and Systems | 45% | 2.7 |
| | | | |

Used for:

- Gap assessment
- Tracking progress
- Navigating the standard

Key - Level of readiness

| 1 | 1 = No progress has been made |
|---|--|
| | |
| 2 | 2 = Some progress made but a lot of work still required |
| 3 | 3 = Partly progressed |
| 4 | 4 = Significant progress made but some minor work still required |
| 5 | 5 = Fully implemented to meet all requirements |



Transition Resource Group (TRG) for IFRS 17

William Hines
Boston

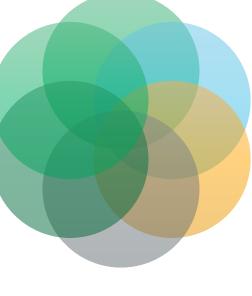


TRG Background

4 scheduled meetings in 2018; December meeting postponed to April 2019

TRG is a discussion forum; they have no decision making power

Convened by International Accounting Standards Board (IASB)



4 IASB members in regular attendance

15 members and 3 observers

All 18 were appointed by the IASB, not chosen by their organisations



TRG Background (2)

Agenda developed by IASB Staff

Issues for discussion are submitted by stakeholders to the IASB

Staff decides which issues are to be discussed at TRG

Focus is on situations where IFRS 17 language could have more than on interpretation



TRG Background (3)

81 issues submitted through September meeting

21 issues brought to TRG for discussion

Remainder was determined by the IASB staff:

- (a) can be answered applying only the words in IFRS 17;
- (b) do not meet the submission criteria; or
- (c) are being considered through a process other than a TRG discussion (such as a proposed annual improvement).



February TRG meeting issues

Separation of components of contracts

Contract boundary issues with repricing mechanism

Contract boundary issues including reinsurance contracts held

Acquisition cash flows at initial recognition and at transition

Coverage units for amortising Contract Service Margin (CSM)

Insurance acquisition cashflows when applying fair value at transition



May TRG meeting issues

Combination of Insurance contracts

Risk adjustment for non-financial risk on consolidation

Contract boundary issues on

- renewable contracts,
- exercise of options, and
- reinsurance contract held

Coverage units for amortising the CSM

Summary of implementation challenges



September TRG meeting issues

Insurance risk consequent to a claim

Determining a discount rate using a top-down approach

Commissions and reinstatement premium in reinsurance contracts issued

Premium experience adjustments related to current or past service

Cash flows that are outside the contract boundary at inception

Recovery of acquisition cash flows

Premium waivers

Group Insurance policies

Industry pools managed by an association

Annual cohorts for contracts that share in the return of a specified pool of underlying items



Coverage Units

- CSM is to be amortised in proportion to the services provided over the expected coverage period.
- Coverage units establish the amount of service provided for insurance.
- Investment components do not represent service provided.
- Coverage units reflect the likelihood of insured events occurring only to the extent that they affect the
 expected duration of contracts in the group; and
- Coverage units do not reflect the likelihood of insurance events occurring to the extent that they affect
 the amount expected to be claimed in the period.
- The use of the maximum level of cover and the expected level of cover in periods.



Reinsurance Contracts Held

- Issue was how to read requirements of IFRS 17 paragraph 34 regarding the boundary of an insurance contract with respect to reinsurance contracts held
- When does substantive right to receive services from the reinsurer end
 - When reinsurer has practical ability to reassess the risk and set a price that fully reflects the risk
- When does substantive obligation to pay amounts to reinsurer end
 - When insurer can terminate the contract
- Both ceding and assuming company need to be able to get out simultaneously to reach the contract boundary
- Boundary could include contracts that are expected to be issued in the future.
- Primarily affects the development of the CSM for reinsurance contracts held.



Risk Adjustment for Non-financial Risk

Situation is where an insurance group containing multiple legal entities must produce IFRS financial statements at both the entity and the group level. Can the risk adjustment be different when reporting at the entity and group levels? The IASB staff and Board members say no. They believe there is only one measurement that can be used and it is at the level of the entity that actually issues the contract. TRG members noted that in practice insurers do consider different risks at the group level versus the subsidiary level. Can allocate diversification from group level to the entity level.



Insurance Risk after Incurred Claim

Is a claim resulting in insurance risk accounted for as a liability for incurred claims or a liability for remaining coverage?

Two examples in the staff analysis include a disability claim with ongoing regular payments and the rebuild of a property following a fire claim.

The Staff analysis concluded that the standard could be read to support either approach

Insurers would have to choose an accounting policy based on the facts and circumstances of the products they issue.

There was some concern expressed about inconsistent treatment of similar products under current accounting rules and that this would continue under IFRS 17 if both approaches were valid.



Emerging market practice and practical considerations

Eamon Comerford

Dublin



Areas of focus

1. Classification

2. Aggregation

3. Transition

4. Risk adjustment

5. Discount rates



Classification

- Scope of IFRS 17 largely unchanged from IFRS 4
- IFRS 17 applies to:
 - Contracts with significant insurance risk
 - Investment contracts with discretionary participation features
- Some companies taking the opportunity to revisit some UL classifications
- 36% of companies have indicated in our Milliman IFRS 17 survey that they
 will re-determine "significant insurance risk" for some of their business



Setting portfolios





Generally, insurers going with a "less is more" approach on this

Setting portfolios

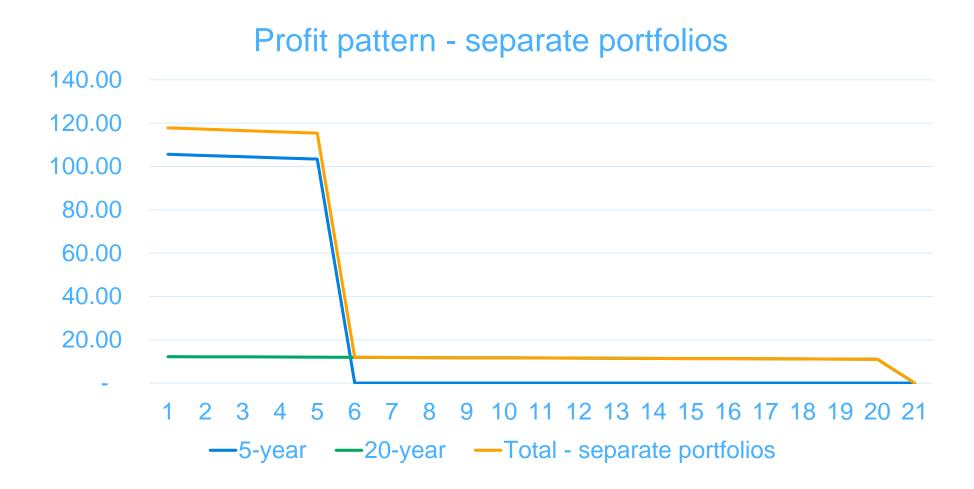
But...simplicity may not always give an optimal outcome

Example:

- A company writes 100 5-year term contracts and 100 20-year contracts in a given year
- Initial CSM for 5-year contracts: 500
- Initial CSM for 20-year contracts: 200
- Using policy count as coverage units
- 2% lapse rate before maturity

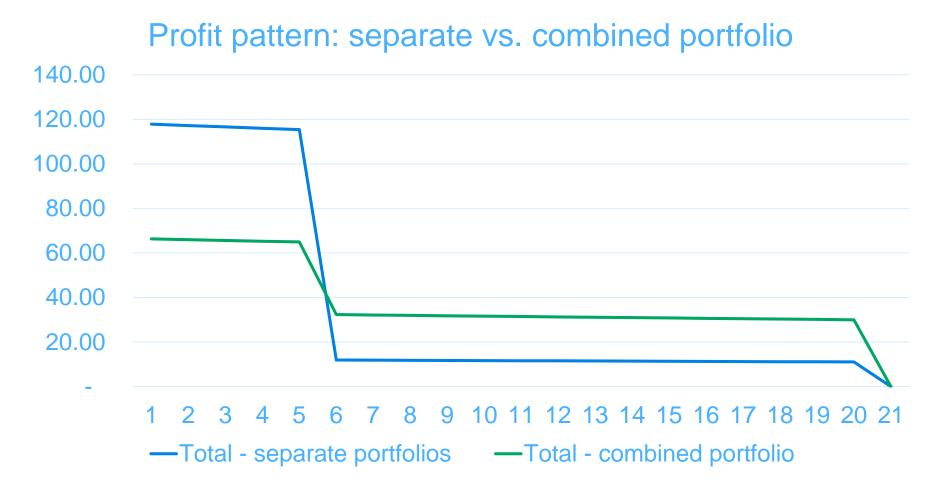


Setting portfolios





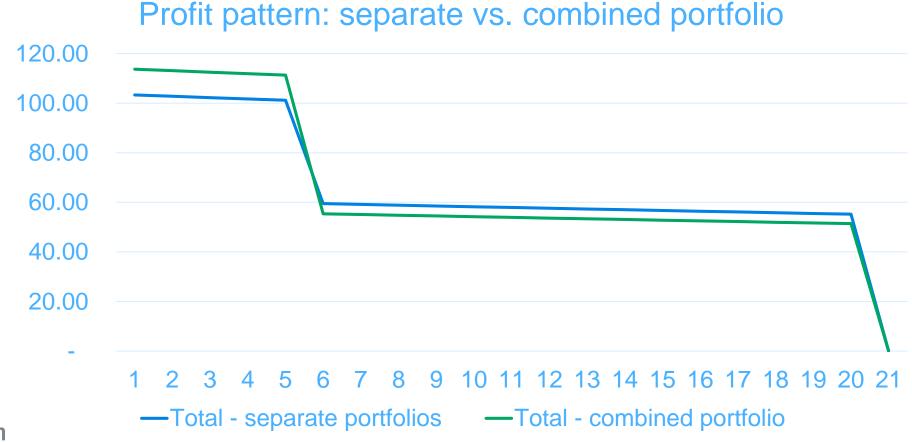
Setting portfolios





Setting portfolios

- Let's say instead that:
 - Initial CSM for 5-year contracts: 200, Initial CSM for 20-year contracts: 1000



Identifying profitability groups

Must split contracts in portfolio at initial recognition into:

1. Onerous contracts

Survey: 6%

3. Other profitable contracts

Survey: 33%

2. Profitable contracts without significant possibility of becoming loss-making

Survey: 60%

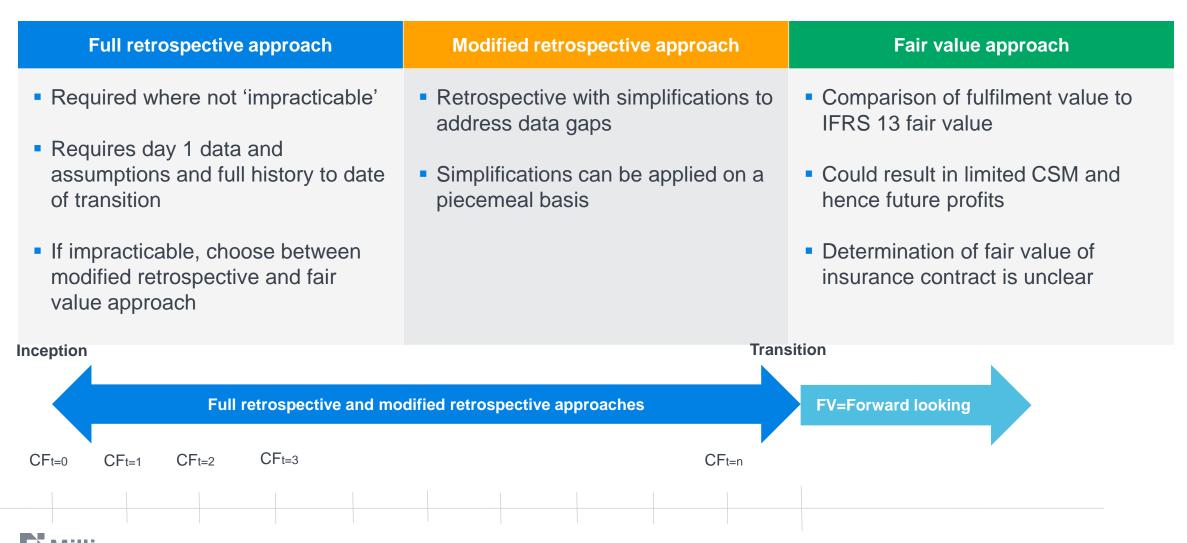
Identifying profitability groups – How?

- If have "reasonable and supportable information" that contracts will be in a particular group, don't need to assess at contract level
- Important as losses on onerous contracts recognised immediately but profits spread over contract term – typically don't want onerous contracts!
- Approaches:
 - Could do very sophisticated analysis to split contracts into the three groups set probability level for "significant possibility" then do stress testing of contract profitability at inception
 - Simpler approach Use pricing reports / profit testing / VNB information. If known cross subsidies (e.g. blocks of small policies are loss making) would need to separate



Transition – three approaches

Approaches - recap



Transition

Approaches – Preliminary survey results





Transition

Approaches

- No simple approach!
- Frustration with inflexibility of retrospective approaches



- Most companies will pick a mix of approaches:
 - Apply full retrospective for business written between now and transition date and generally business written in last few years too.
 - Modified retrospective / fair value for older business, especially if materiality relatively low



Fair value vs Fulfilment cash flows

Many potential differences

| | FCF | FV |
|----------------------|-----------------------|--|
| Standard | IFRS 17 | IFRS 13 |
| Renewals | Not included | May be included i.e. different contract boundaries |
| Expenses | Directly attributable | All |
| Non-performance risk | Not included | Must be included |

- Others
 - Discount rates
 - Risk adjustment, diversification benefits, cost of capital rate



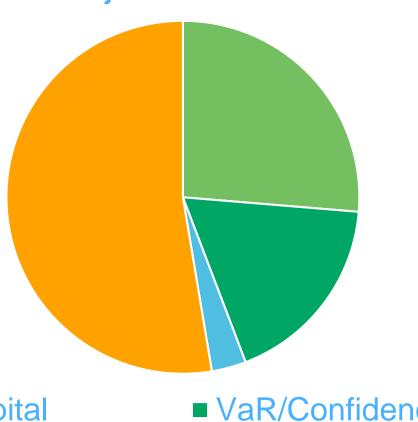
Approach

- Recap: similar concept as Solvency II risk margin but method and confidence level not specified
- Two possible approaches for most standard formula European insurers
 - Cost of capital
 - Quantile approach
- Possible calibration approach:
 - Benchmark with the Solvency II SCR stresses (99.5% percentile) and assume normality (99.5% percentile ~ 2.58 x SD)



Approach – Preliminary survey results

Risk adjustment method



- Cost of Capital
- Other

- VaR/Confidence interval
- Undecided



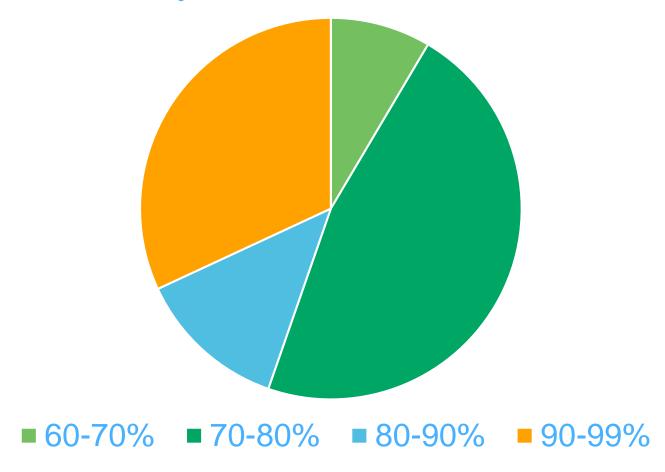
Confidence level





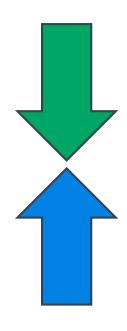
Confidence level – Preliminary survey results

Risk adjustment confidence level





Which approach?



Top-down

Bottom-up

 Bottom-up arguably simpler: Easier to come up with term structure, avoid need to build portfolio, avoid need for credit risk assessment, similarity to Solvency II



Which approach? Preliminary survey results



- Broadly similar for Irish companies
- European responses close to 50/50



Liquidity premium

- Some business can justify the addition of a liquidity premium to discount rates
- Classic example is annuities
- UL contract with no surrender penalty might be considered fully liquid
- Many products fall somewhere in between these two

 No particularly satisfactory way to decide exactly how "liquid" an insurance contract is - rarely an equivalent market instrument to benchmark against



Can we use Solvency II rates?

- For relatively short tailed and relatively liquid business, possibly reasonable
- Others more difficult:
 - Liquidity premium
 - Last liquid point
 - Ultimate forward rate
 - Can Solvency II rates be justified for IFRS 17 given we know the UFR is artificially high at present due to the mechanism to limit changes?



Coffee Break

IFRS 17 data and technology considerations

Amritpal Khangura
Life Technology
Solutions (London)



Contents

Challenges

- Business environment
- Technology
- Operations/processes

Potential Solutions

- Overview
- Architecture
- Technology
- Actuarial functionality



Contents

Challenges

- Business environment
- Technology
- Operations/processes

Potential Solutions

- Overview
- Architecture
- Technology
- Actuarial functionality



"The world is changing very fast. Big will not beat small anymore. It will be the fast beating the slow."

Rupert Murdoch



Internal



Empower Employees

Optimise Operations

Challenges and complexities

Broad themes



Data: Sources, Volume, Quality, Storage and Integration

- Multiple sources, quality variable, data tagging inconsistent, etc.
- Storage of prior period results and at-inception based parameters
- Significant current period cash flow data at a very granular level
- Integration with projection models, general ledger, data warehouses



IFRS 17 Calculations

- Calculate key IFRS 17 balance sheet and revenue account items
- Lots of complex items: accrual's type calculation of CSM, multiple discount rates, onerousness, loss-component, reinsurance, risk adjustment etc
- Reconciliation and movements analysis between prior and current period
- Sensitivity / what-if analysis

Challenges and complexities

Broad themes (Cont'd)



Accounting and Actuarial Analysis and Sign-off

- Short reporting time frames, with lots of volume being generated
- Analysis needed at different levels of granularity, and roll-ups, cohort-level through to entity and group levels
- Handling of "manuals" where and how. FCM vs top-side adjustments



Resourcing Challenges

- Greater importance of cross-department collaborations
- Learning new standards, new reporting presentations, and terminology
- Existing projects and development initiatives with finite resources

IFRS 17: Modelling Hot Topics

Summary



1. PAA and LIC

Modelling complexity of PAA and other items such as liability for incurred claims.



2. Currency

How to capture multiple currencies, and movements over time.

Reporting entity and group results in local and group currencies.



3. Onerousness Testing

In-cycle onerousness testing, including labelling of new business into right cohort.



4. Sensitivity Testing

Proxy sensitivity testing, without requiring heavy model re-runs. Other what-if and future projection capabilities.



5. Risk Adjustment

Enhance risk adjustment calculation to perform stress and correlation of appropriate risk drivers. Other methodologies?



6. Reinsurance

Concept of "shadow" runs to capture movements in gross business for use in ceded layer CSM movements.



7. IFRS 17 Analytics

Time to analyse is minimal. Analysis and reporting needs to be the focus, not executing operational processes.



8. Collaboration

Ability for users to analyse, converse with others. define actions and complete sign-off of financial results.



Contents

Challenges

- Business environment
- Technology
- Operations/processes

Potential Solutions

- Overview
- Architecture
- Technology
- Actuarial functionality



Components

Financial Platform

Key Components

Finance Platform

Workflow Management

Data Warehouse

(CSM, locked-in parameters, prior periods etc)

Actuarial Models

(Life and non-life actuarial models)

IFRS 17 Calculations

(BE, CSM, RA, LRC, LIC, LCR, P&L, OCI etc)

Reporting / Analytics

(Dashboards, extracts, account postings)

Accounting Systems

(actuals data etc)

Potential Considerations

Cloud vs On-premises

Use of cloud provides greater scalability.
Versus on-premises control and customisation ease.

Actuarial vs Accounting

Both accounting and actuarial data needed. Are RA and CSM an actuarial or accounting calculation?

... and lots more.

Data Warehouse

Ability to store prior period results, including locked-in parameters and other assumptions.

Actuarial Models

Best estimate cashflows, TVOG, econ vs non-econ assumptions, discount rates, data tags etc.

Analytics

Reporting layer to support analysis, KPI, aggregations, review and sign-off.

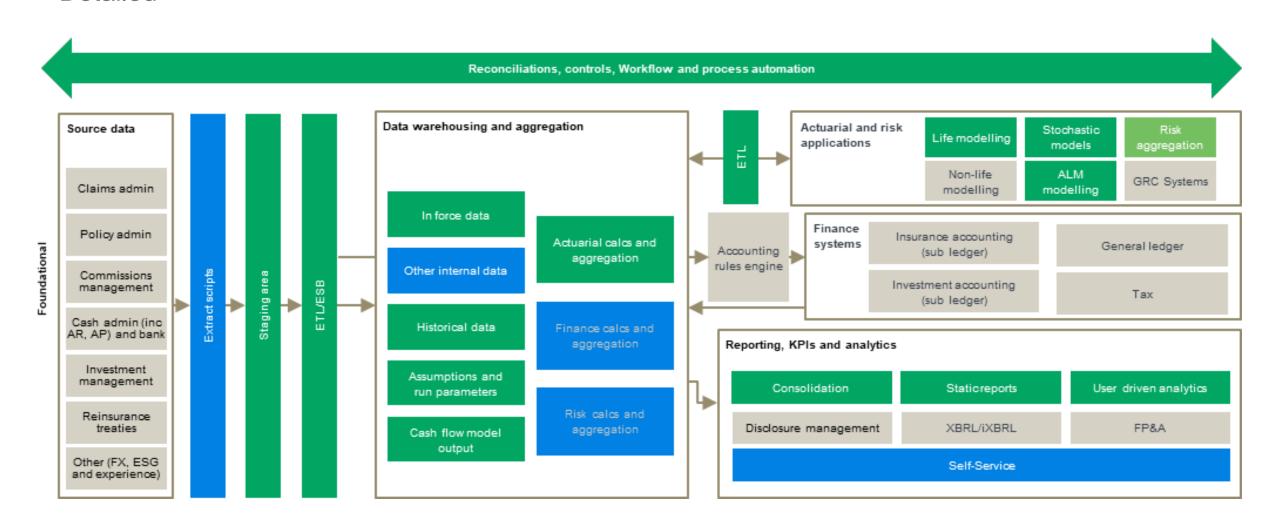
Accounting Integration

Accounting specific output to support integration into general ledger systems and other accounting systems.



Typical Workflow

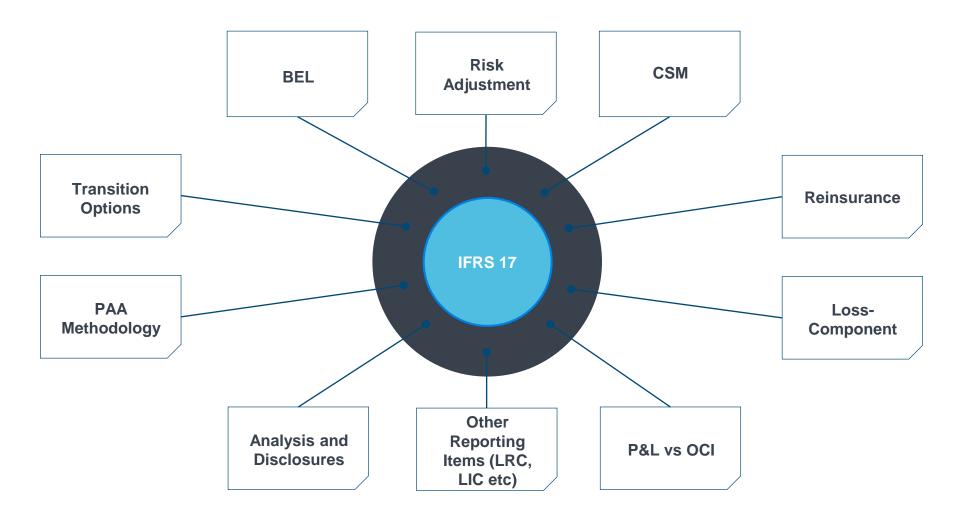
Detailed





Actuarial Functionality

Summary





Best-Estimate Liability (BEL)

Key Requirements

- Cashflows split by insurance and deposit are provided for each cohort as:
 - BEL discount rates are model inputs
 - At inception, valuation date, and projected calculations

Suggestion: Reconciliation of BEL between IFRS and Actuarial models

Suggestion: Ability to handle detailed cashflows (premiums, expenses, claims, others) to support Actual vs Expected analysis



Key Requirements

Separately definable discount rates:

By cohort

BEL vs RA vs CSM

Insurance vs Investment Locked, prior, current

Time-weighted cash flows for BEL discounting

Suggestion: Ability to do weighted average discount curves for analysis, reporting and disclosures.

Suggestion: Storage of locked-in discount rates



Contractual Service Margin (CSM)

Key Requirements

- Use of discounted or undiscounted coverage units
- Locked (GM) or current (VFA) discount rates
- At inception, valuation date, and projected calculations
- Ability to handle non-economic and economic impacts as per measurement model rules

Suggestion: Flexibility in defining coverage unit at cohort level

Suggestion: Flexible unlocking steps, allowing for greater insight of movements

in CSM



Calculation – Other calculated items

- Liability for remaining coverage ("LRC")
- Loss Component of LRC ("LCR"):
 - calculated at inception, valuation date and projected
 - all scenarios covered:
- Onerous at inception

Onerous → Onerous

Profitable → Onerous

- Onerous → Profitable
- P&L or OCI (cohort level choice) impact of GM economic assumption changes
- Reinsurance:
 - Negative CSM permitted for Reinsurance ceded



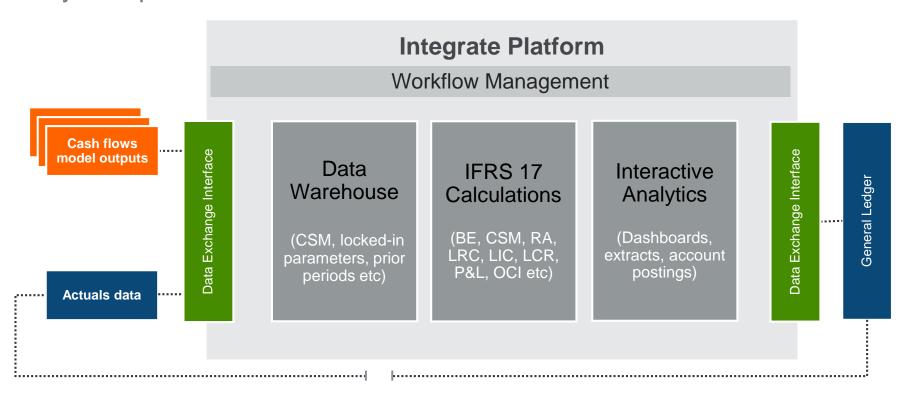
Analytics

- Input data analysis and validations
- Output data analysis at cohort-level up to group-level
- Disclosure needs:
 - Comprehensive Income Statement
 - Movement analyses and reconciliations from the prior period for:
 - LRC, LCR and LRC
 - BEL, RA and CSM
- Actual vs expected cash flow analysis
- Discount rate analysis
- General ledger postings



Integrate IFRS 17 Solution

Key Components



External Input Data Data Exchange Interface External Valuation System(s) Integrate Component



Managed service

End-to-end process provided as a managed service with full customer and operational support.

Automated Workflow

Automate execution of endto-end process. Full audit and governance.

Cloud-based review

Interactive reporting layer to support analysis, review and sign-off across multiple reporting bases.

Accounting Integration

Accounting specific output to support integration into client general ledger systems and other accounting systems.

Integrate IFRS 17 Solution

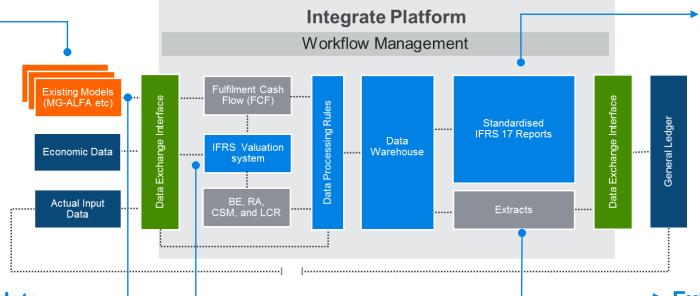
Architecture

Integrate Platform

- · Cloud based actuarial platform
- Fully backed-up, full disaster recovery protection, cybersecurity protection
- 24x7 operational support during valuation period
- Ability to automate end-to-end workflow, with full auditability and governance

Projection Model(s)

- Continue to run on existing platform(s)
- Changes need to support IFRS 17 cash flow requirements
- Labelling for cohort grouping



Analysis Layer

- Cloud based approach to analysis and review of IFRS 17 calculations
- Results can be sourced from multiple sources to provide complete picture to support analysis
- Ability to provide reports for multiple reporting bases, and allow for reconciliation across these bases
- Ability to interact and drill-down into results

Cash flow data

- Combine results from multiple runs and systems
- Either in the cloud or onpremises

IFRS 17 Model

MG-ALFA model that:

- Consumes data from multiple sources (cash flow model and data warehouse)
- · Calculates BE, CSM, RA and LCR.
- Includes on-going re-measurement of CSM covering interest accretion, change for assumptions, experience impact etc.

Extracts

- Targeted extracts containing all required data for down-stream processing
- Includes postings (deltas and balances)
- Provided via fully governed and automated data exchange interface



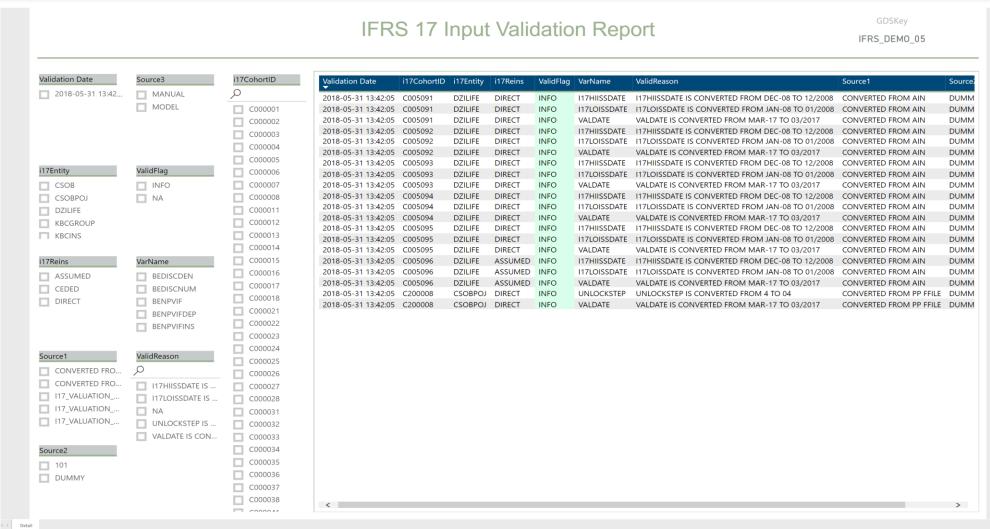


William Hines
Eamon Comerford
Andrew Kay
Amritpal Khangura

Q&A Panel Discussion

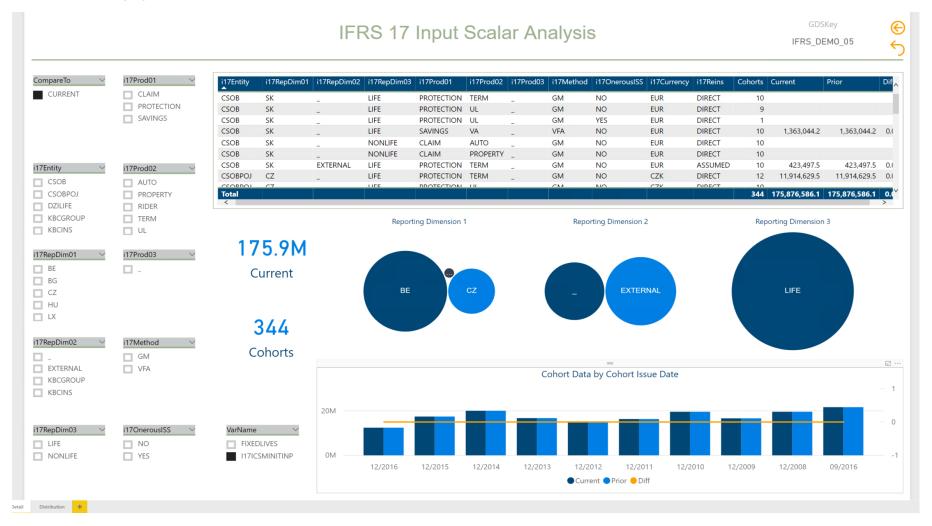
Appendix 1 Integrate IFRS 17 Analytics

Input Validation



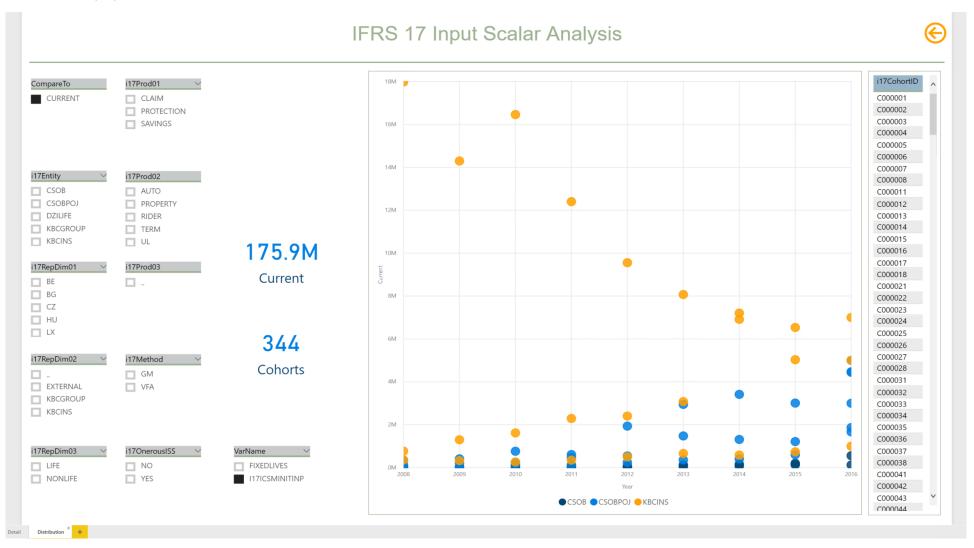


Input Scalar Data (1)



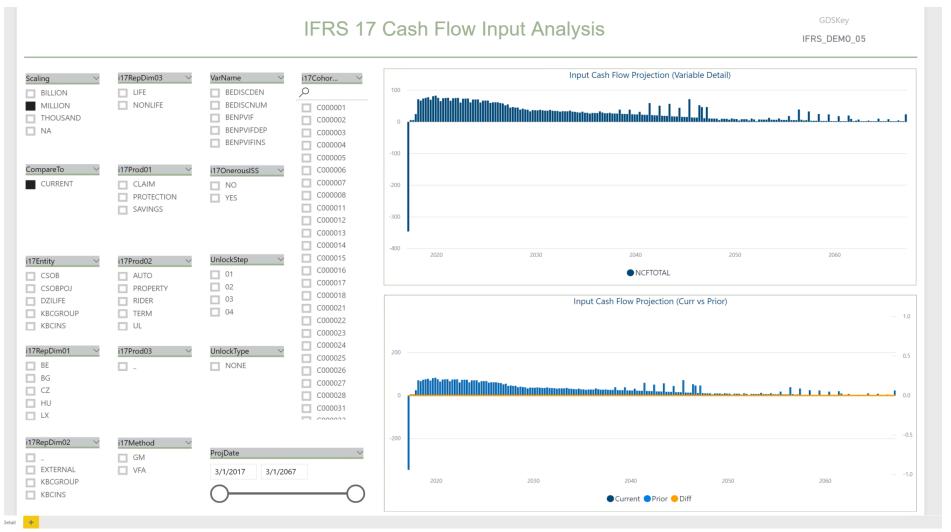


Input Scalar Data (2)



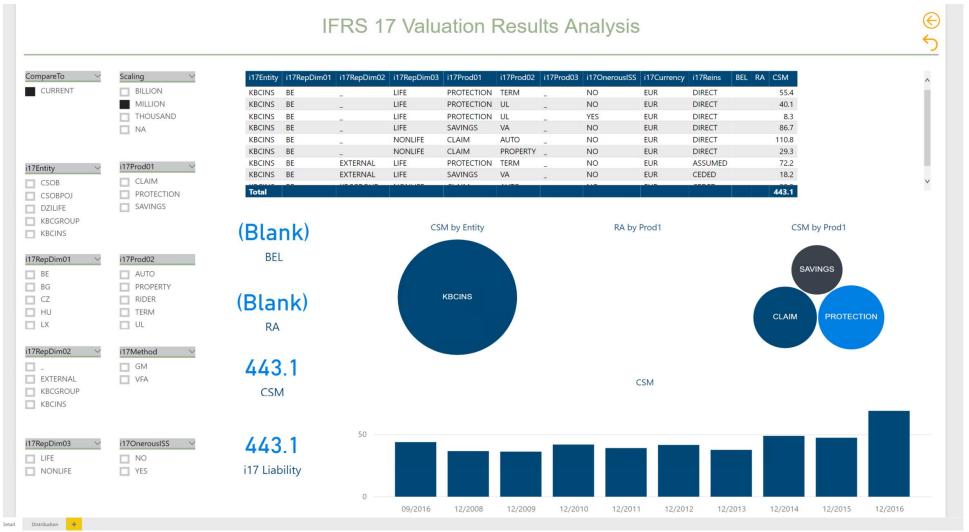


Input Vector Data



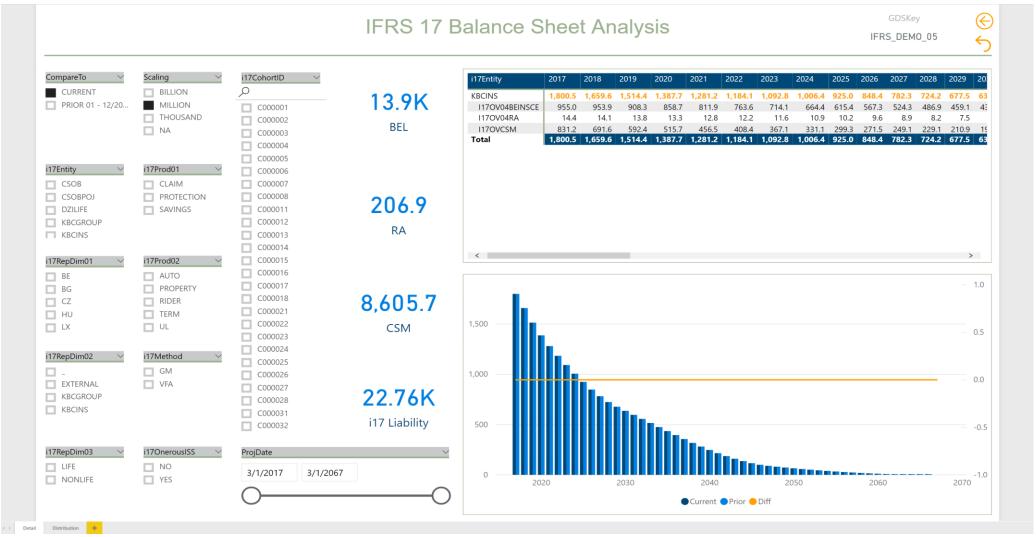


Output Scalar Data (1)



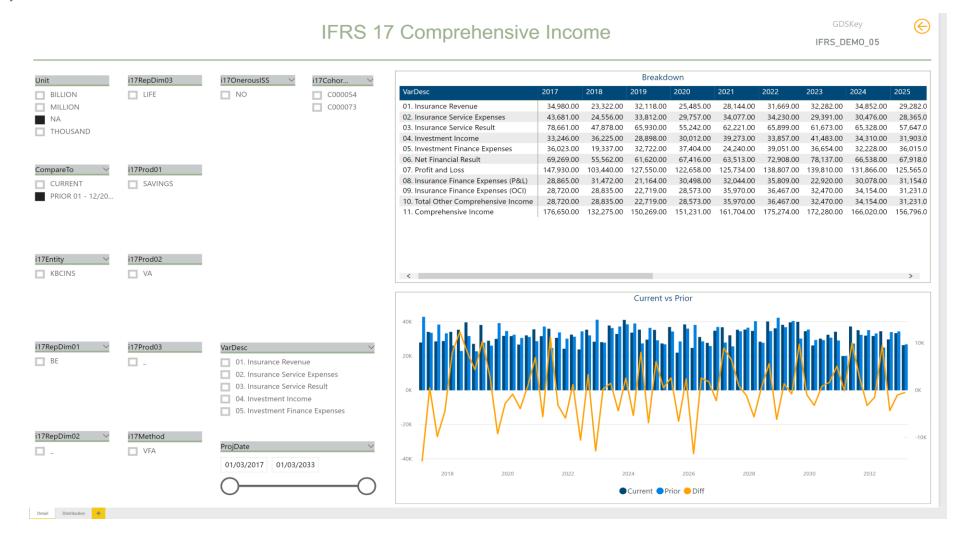


Balance Sheet



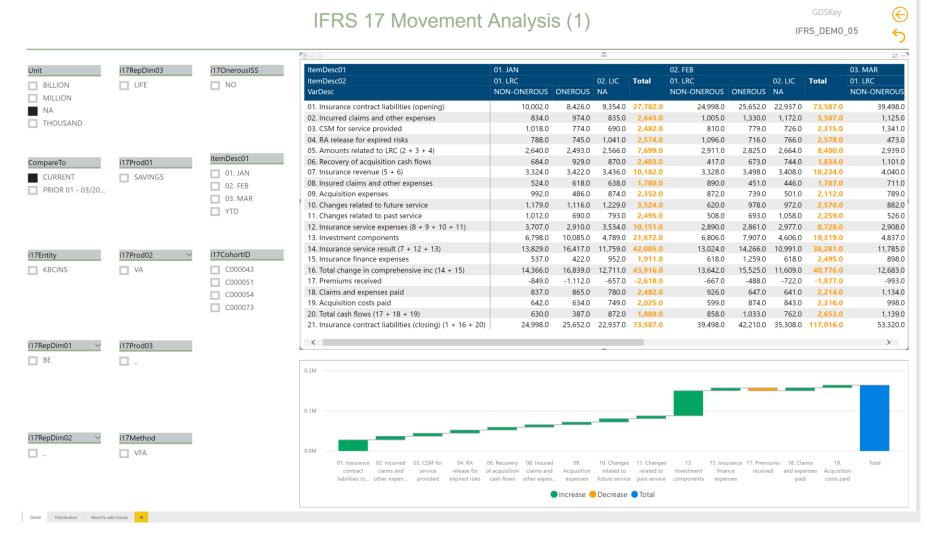


Comprehensive Income



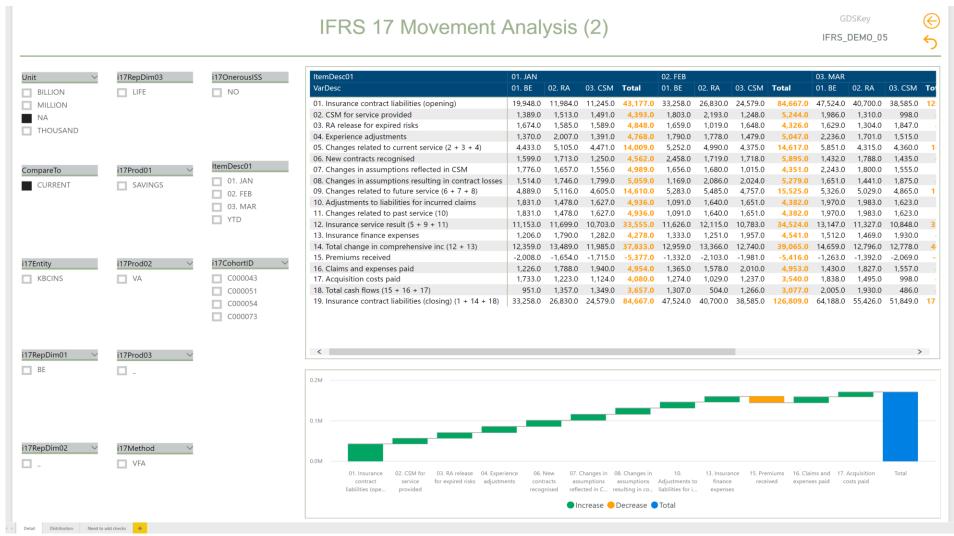


Movement Analysis (1)





Movement Analysis (2)





Appendix 2 About Milliman

How Milliman can help...



CONSULTING

- Development of methodology and internal standard
- Financial impact analysis
- Gap analysis/Readiness monitoring
- Accounting manual
- Assumption setting
- Design of the income statement and chart of accounts
- Development performance measures
- Analysis of interaction between IFRS 9 and IFRS 17
- Model validation
- Forecasting/Multi-term planning bases on IFRS 17



MODEL DEVELOPMENT

- Prototyping supporting the development of the methodology
- Development of model projection/valuation tools
- Development of data interface into the projection software
- Data validations
- Development of run schedules to generate the information of the income statement, balance sheet and disclosures
- Model testing and documentation



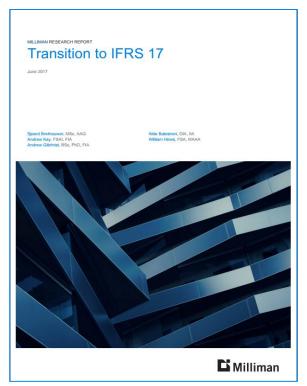
REPORTING SOLUTIONS

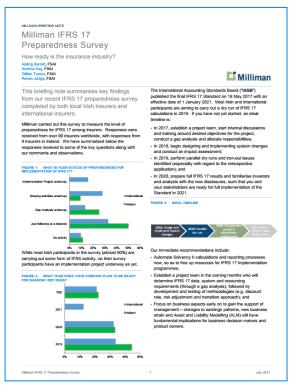
- Workflow management
- Data warehouse solutions between the projection software and the general ledger
- Data interfaces into the data warehouse of general ledger
- Checks and balances/validation of outputs
- Reporting engines
- Reconciliation of SII, MCEV, or other GAAP to IFRS 17

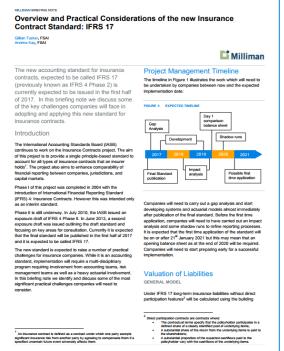


IFRS 17 Thought Leadership

- Milliman's internal IFRS 17 working group have been actively following developments for the past 5 years including participating in the Accounting Committee of the International Actuarial Association (IAA).
- We have published a number of IFRS 17 briefing notes, white papers, blogs, and articles and have a dedicated website on IFRS 17 (http://www.milliman.com/IFRS/)
- We have presented on IFRS 17 at many industry events and deliver IFRS 17 training to finance professionals.









This course is suitable for insurance professionals, practitioners and senior management involved in

IFRS reporting and implementation.



