



SUFFOLK LIFE ANNUITIES LIMITED  
SOLVENCY AND FINANCIAL  
CONDITION REPORT ('SFCR') YEAR  
END 2022



## SUFFOLK LIFE ANNUITIES LIMITED SFCR YEAR END 2022

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# SUMMARY

The purpose of the Solvency Financial and Condition Report ('SFCR') is to provide information about the capital position at 31 December 2022 of Suffolk Life Annuities Limited ('SLA') based on the Solvency II requirements.

This report sets out different aspects of SLA's business and performance, risk profile, valuation methods used for solvency purposes and its capital management practices.

For 31 December 2022 SLA met the audit requirements for the SFCR. All figures in the document for the 31 December 2021 have not been audited as SLA did not meet the audit requirement.

## Business Performance

SLA is a limited company incorporated and domiciled in the UK, and is a subsidiary of Curtis Banks Group PLC. SLA provides long-term linked life insurance products in the form of Self-Invested Personal Pensions ('SIPPs') and other self invested products.

For the year ended 31 December 2022 SLA made a profit after tax of £457k (2021: £600k).

## Systems of Governance

SLA's system of governance encompasses the overall framework and structure adopted to ensure it meets the requirements of a robust risk management function. This section of the report aims to provide details of the overarching risk management framework, alongside the key roles, responsibilities and committees providing oversight and direction to the SLA Board.

Roles and responsibilities for risk management comprise of a three lines of defence model. The risk governance framework enables the various Group Boards (incorporating the SLA Board alongside the other regulated entities within the Group) to be satisfied that the embedded risk culture is effectively dealing with risks to which the Group may be exposed. The key elements of the framework include:

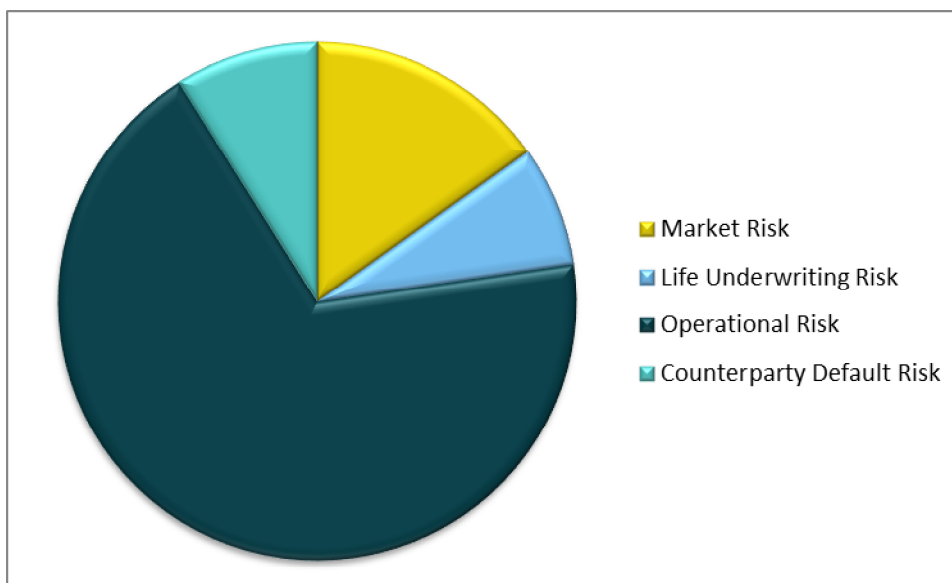
- Focussed risk appetite statements
- Risk Management Framework, Policies and Procedures
- Regular analysis of material risk exposures via the robust governance structure

Further details on our Systems of Governance are detailed in Section B.

## Risk Profile

SLA is a unit linked business that does not provide any guarantees on its products. The main sources of risk exposure for SLA are operational risk and from the recognition of future profits on SLA's Solvency II balance sheet which drive the SCR risks.

The pie chart below sets out SLA's risk profile, based on the Solvency Capital Requirement determined on a standard formula basis:



## Valuation for Solvency Purposes

SLA's Solvency II balance sheet is constructed under the Solvency II rules and guidance. The table below sets out the SLA's SII balance sheet as at 31 December 2022 and 31 December 2021:

(£'000)	31 December 2022	31 December 2021
<b>Assets</b>		
Assets held for index-linked and unit-linked contracts	3,387,892	3,836,213
Other Assets	6,796	8,426
<b>Total Assets</b>	<b>3,394,688</b>	<b>3,844,639</b>
<b>Liabilities</b>		
Technical provisions - index-linked and unit-linked	3,382,072	3,829,126
Other Liabilities	5,187	5,543
<b>Total Liabilities</b>	<b>3,387,259</b>	<b>3,834,669</b>
<b>Own Funds</b>	<b>7,429</b>	<b>9,970</b>

## Capital Management

SLA's capital management strategy is to ensure that there are sufficient own funds to meet the Solvency Capital Requirement ('SCR') and Minimum Capital Requirement ('MCR'), with a target capital ratio of at least 130% of the biting requirement. As at the 31 December 2022 the biting capital requirement was the MCR which was £3,445k (2021: £3,126k) and own funds totalled £7,429k (2021: £9,970). This gives capital coverage of 216% (2021: 319%), well within the coverage tolerance. The SCR for SLA as at the 31 December 2022 was £2,670k (2021: £2,687k) and own funds coverage of the SCR was 278% (2021: 371%).

SLA monitors its capital coverage on a monthly basis as part of management's finance and risk review. During the period SLA has maintained compliance with both the SCR and MCR and its target capital coverage.

SLA's capital items are all classified as tier 1 capital.

# DIRECTORS STATEMENT

We acknowledge our responsibility for preparing the SFCR in all material respects in accordance with the PRA Rules and the Solvency II Regulations.

We are satisfied that:

- a) throughout the financial year in question, the insurer has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable to the insurer; and
- b) It is reasonable to believe that the insurer has continued so to comply subsequently and will continue so to comply in future.



Director



Director

For and on behalf of Suffolk Life Annuities Limited

6 April 2023

# AUDITORS REPORT

Report of the external independent auditors to the Directors of Suffolk Life Annuities Limited ('the Company') pursuant to Rule 4.1 (2) of the External Audit Part of the PRA Rulebook applicable to Solvency II firms

Report on the Audit of the relevant elements of the Solvency and Financial Condition Report

## Opinion

We have audited the following documents prepared by the Company as at 31 December 2022:

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Solvency and Financial Condition Report of the Company as at 31 December 2022, ('the Narrative Disclosures subject to audit'); and
- Company templates S.02.01.02, S.12.01.02, S.23.01.01, S.25.01.21 and S.28.01.01 ('the Templates subject to audit').

The Narrative Disclosures subject to audit and the Templates subject to audit are collectively referred to as the 'relevant elements of the Solvency and Financial Condition Report'.

We are not required to audit, nor have we audited, and as a consequence do not express an opinion on the Other Information which comprises:

- The 'Summary', 'Business and performance', 'System of governance' and 'Risk profile' elements of the Solvency and Financial Condition Report;
- Company template S.05.01.02 and S.05.02.01;
- The written acknowledgement by management of their responsibilities, including for the preparation of the Solvency and Financial Condition Report ('the Responsibility Statement').

In our opinion, the information subject to audit in the relevant elements of the Solvency and Financial Condition Report of the Company as at 31 December 2022 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

## Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) including ISA (UK) 800 and ISA (UK) 805, and applicable law. Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the relevant elements of the Solvency and Financial Condition Report section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the Solvency and Financial Condition Report in the UK, including the FRC's Ethical Standard as applied to public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.



## Material uncertainty related to going concern

In forming our opinion on the Solvency and Financial Condition Report, which is not modified, we have considered the adequacy of the disclosure made in page 13 of the Solvency and Financial Condition Report concerning the company's ability to continue as a going concern. On 6th January 2023, the board of Suffolk Life Annuities Limited's ultimate beneficial owner, Curtis Banks Group plc, announced they had agreed terms of a recommended all cash offer to be made by Nucleus Clyde Acquisition Limited for the entire issued and to be issued share capital of Curtis Banks Group plc. The offer was approved by Curtis Banks Group plc shareholders on 27th February 2023 and is now subject only to regulatory approval which is expected within the next 12 months such that Curtis Banks Group plc and all subsidiaries will therefore be under new ownership. While the directors do not have any reason to believe that the acquirer will not continue to support the company or materially change its activities in the next 12 months, they do not have full visibility over the future intentions of the acquirer. These conditions, along with the other matters explained in page 13 of the Solvency and Financial Condition Report, indicate the existence of a material uncertainty which may cast significant doubt about the company's ability to continue as a going concern. The Solvency and Financial Condition Report do not include the adjustments that would result if the company were unable to continue as a going concern.

In auditing the Solvency and Financial Condition Report, we have concluded that the directors' use of the going concern basis of accounting in the preparation of the Solvency and Financial Condition Report is appropriate.

However, because not all future events or conditions can be predicted, this conclusion is not a guarantee as to the Company's ability to continue as a going concern.

Our evaluation of the Directors' assessment of the Company's ability to continue to adopt the going concern basis of accounting included:

- Obtaining and evaluating the Directors' going concern assessment which reflects conditions up to the point of the approval of the Solvency and Financial Condition Report;
- Performing look-back procedures on management's previous assessments to determine the reasonableness and accuracy of the forecasts and assumptions used; and
- Assessing the reasonableness of the severe but plausible going concern stress scenarios presented by management and concluding these were modelled appropriately and reflective of possible stresses.

Our responsibilities and the responsibilities of the Directors with respect to going concern are described in the relevant sections of this report.

## Emphasis of Matter - Basis of Accounting

We draw attention to the 'Valuation for solvency purposes' and Capital Management' sections of the Solvency and Financial Condition Report, which describe the basis of accounting. The Solvency and Financial Condition Report is prepared in compliance with the financial reporting provisions of the PRA Rules and Solvency II regulations, and therefore in accordance with a special purpose financial reporting framework. The Solvency and Financial Condition Report is required to be published, and intended users include but are not limited to the Prudential Regulation Authority. As a result, the Solvency and Financial Condition Report may not be suitable for another purpose. Our opinion is not modified in respect of this matter.

## Other Information

The Directors are responsible for the Other Information.

Our opinion on the relevant elements of the Solvency and Financial Condition Report does not cover the Other Information and we do not express an audit opinion or any form of assurance conclusion thereon.

In connection with our audit of the Solvency and Financial Condition Report, our responsibility is to read the Other Information and, in doing so, consider whether the Other Information is materially inconsistent with the relevant elements of the Solvency and Financial Condition Report, or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the relevant elements of the Solvency and Financial Condition Report or a material misstatement of the Other Information. If, based on the work we have performed, we conclude that there is a material misstatement of this Other Information, we are required to report that fact. We have nothing to report in this regard.

### **Responsibilities of Directors for the Solvency and Financial Condition Report**

The Directors are responsible for the preparation of the Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations.

The Directors are also responsible for such internal control as they determine is necessary to enable the preparation of a Solvency and Financial Condition Report that is free from material misstatement, whether due to fraud or error.

### **Auditors' Responsibilities for the Audit of the relevant elements of the Solvency and Financial Condition Report**

It is our responsibility to form an independent opinion as to whether the information subject to audit in the relevant elements of the Solvency and Financial Condition Report is prepared, in all material respects, in accordance with financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

Our objectives are to obtain reasonable assurance about whether the relevant elements of the Solvency and Financial Condition Report are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decision making or the judgement of the users taken on the basis of the Solvency and Financial Condition Report.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud, is detailed below.

Based on our understanding of the Company/industry, we identified that the principal risks of non-compliance with laws and regulations related to breaches of UK regulatory principles, such as those governed by the Financial Conduct Authority and the Prudential Regulation Authority, and we considered the extent to which non-compliance might have a material effect on the Solvency and Financial Condition Report. We also considered those laws and regulations that have a direct impact on the Solvency and Financial Condition Report such as the PRA rulebook applicable to Solvency II firms. We evaluated management's incentives and opportunities for fraudulent manipulation of the Solvency and Financial Condition Report (including the risk of override of controls), and determined that the principal risks were related to inappropriate journals. Audit procedures performed included:

- Enquiring of the Risk and Compliance functions, including consideration of known or suspected instances of non-compliance with laws and regulation and fraud;
- Reading key correspondence with the Prudential Regulation Authority and the Financial Conduct Authority in relation to compliance with laws and regulations;
- Reviewing data regarding customer complaints, the company's register of litigation and claims and the professional indemnity notification log, in so far as they related to non-compliance with laws and regulations and fraud;

- Reviewing relevant meeting minutes including those of the Board and Risk Committee;
- Identifying and testing journal entries, in particular any journal entries posted with unusual account combinations;
- Designing audit procedures to incorporate unpredictability around the nature, timing or extent of our testing; and
- Testing those estimates most susceptible to risk of fraud.

There are inherent limitations in the audit procedures described above. We are less likely to become aware of instances of non-compliance with laws and regulations that are not closely related to events and transactions reflected in the Solvency and Financial Condition Report. Also, the risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion.

A further description of our responsibilities for the audit is located on the Financial Reporting Council's website at: [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of our auditors' report.

### Use of this report

This report, including the opinion, has been prepared for the Board of Directors of the Company in accordance with External Audit rule 2.1 of the Solvency II firms Sector of the PRA Rulebook and for no other purpose. We do not, in providing this report, accept or assume responsibility for any other purpose or to any other party save where expressly agreed by our prior consent in writing.

### Report on Other Legal and Regulatory Requirements

In accordance with Rule 4.1 (3) of the External Audit Part of the PRA Rulebook for Solvency II firms we are also required to consider whether the Other Information is materially inconsistent with our knowledge obtained in the audit of the Company's statutory financial statements. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.



*PricewaterhouseCoopers LLP*

Chartered Accountants

Reading

6 April 2023

### Appendix - relevant elements of the Solvency and Financial Condition Report that are not subject to audit

The relevant elements of the Solvency and Financial Condition Report that are not subject to audit comprise:

Balances/values as at 31 December 2021 in the Solvency and Financial Condition Report that are identified as 'unaudited' are not subject to audit.

# SECTION A BUSINESS AND PERFORMANCE

## A1 Business

### A1.1 Name and legal form of the undertaking

**Suffolk Life Annuities Limited ('SLA')**

### A1.2 Name and contact details of the supervisory authority

**Prudential Regulation Authority**  
20 Moorgate  
London  
EC2R 6DA

**Financial Conduct Authority**  
12 Endeavour Square  
London  
E20 1JN

### A1.3 Name and contact details of the external auditor

**PricewaterhouseCooper LLP**  
2 Glass Wharf  
Bristol  
BS2 0FR

### A1.4 Qualifying holdings in the undertaking

During the reporting period 100% of the voting rights of SLA were held by Suffolk Life Group Limited. The voting rights of Suffolk Life Group Limited are held by Curtis Banks Group PLC, the ultimate parent company.

### A1.5 Solvency II reporting currency

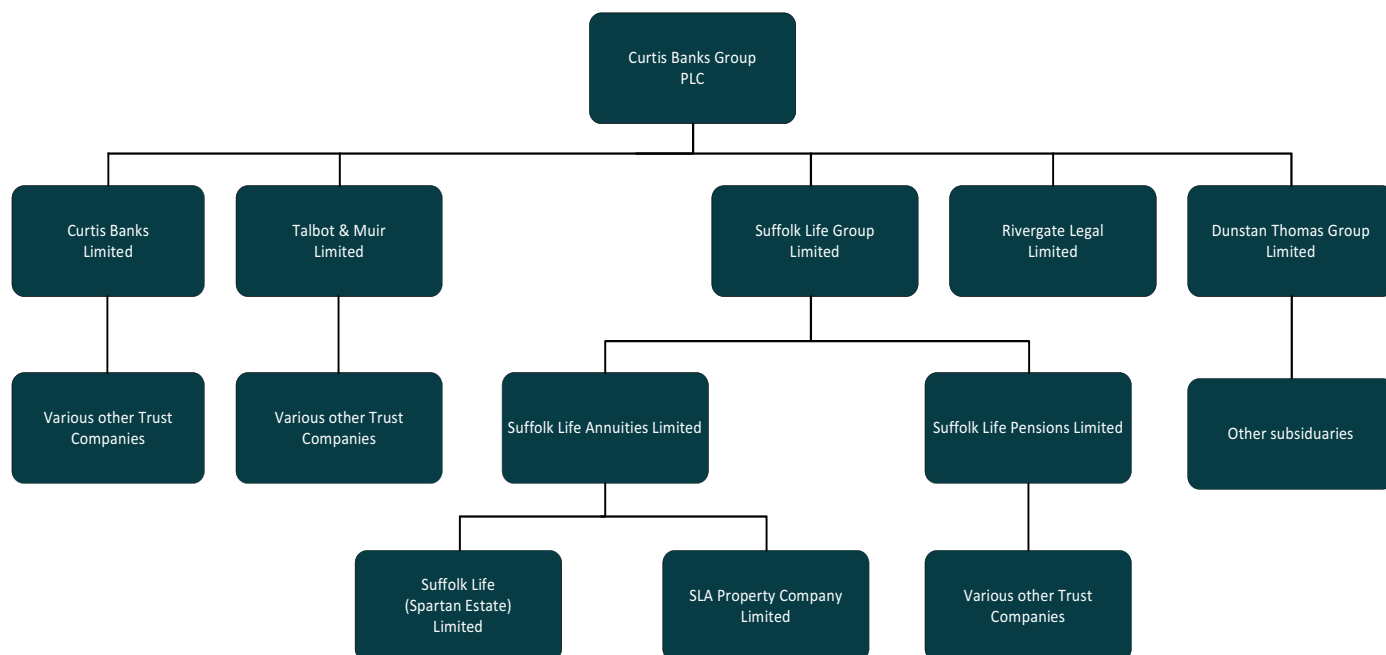
SLA reports on a Solvency II basis in **GBP**.

### A1.6 Reporting period

This report covers the financial position as at 31 December 2022.

## A1.7 SLA position within the legal structure of the group

The corporate structure of the main UK operating entities is set out below:



The Curtis Banks group has been assessed against the Solvency II group reporting requirements. The conclusion of this assessment was that the group does not meet the requirements for group reporting of Curtis Banks Group PLC being an insurance holding company or the group being classed as a financial conglomerate.

## A1.8 Any significant business or other events over the reporting period

During the period a capital re-organisation was implemented to reduce SLA share capital by £1,699k. Following the re-organisation a dividend of £2,200k was paid.

### Going concern

The directors have prepared the SFCR and the financial statements on a going concern basis, as in their opinion the Company is able to meet its obligations as they fall due for at least 12 months from the date of approval of the financial statements. This opinion is based on detailed forecasting for the following 12 months based on current and expected market conditions together with current performance levels.

### Material uncertainty in relation to going concern

Curtis Banks Group Plc, the ultimate parent company, is the subject of an all cash offer from Nucleus Clyde Acquisition Limited that, subject to receipt of regulatory and court approvals, is expected to complete towards the end of H1 2023. Whereas the directors note the intentions of Nucleus as set out in the Scheme circular and they do not have any reason to believe that Nucleus would discontinue support for the Company or would materially change its activities in the next 12 months, they are not party to the detailed intentions of the acquirer. Although this does not change the directors' conclusion as to the appropriateness of preparing the financial statements of the Company on a going concern basis, it is considered to create a material uncertainty which may affect the Company's ability

to continue as a going concern. Accordingly, the financial statements do not include the adjustments that would result if the Company were unable to continue as a going concern.

There have been no other significant or other events during the reporting period.

#### **A1.8.1 Product Range Changes**

There have been no product changes during the year.

##### **A1.8.1.1 New products**

SLA has not written any new products during the reporting period.

##### **A1.8.1.2 Product design changes**

The products that SLA writes have not changed during the reporting period.

#### **A1.8.2 Company structure and changes**

The following changes in the Directors of SLA occurred during the reporting period and up to the date on which the SFCR was signed:

Remained in office	Appointments	Resignations
J A Ridgley (Executive Director)	D Barral (Executive Chirman) (resigned 23 March 2023)	W A Self (Director - CEO)
D Cowland (Executive Director)	A Clarkson (Non-Executive Director)	C Macdonald (Non-executive Director -Chairman)
	P Docherty (Director - CEO)(appointed 10 January 2023)	N T Rodgers (Exective Director)

There have been no further changes to the company structure during the reporting period. However, please note that post year-end the ultimate holding company for SLA (Curtis Banks Group PLC) was approached by Nucleus Clyde Acquisition Limited with a proposal to acquire the entire issued and to be issued share capital of Curtis Banks Group PLC.

## A2 Underwriting performance

The following table sets out SLA's underwriting performance (all activity relates to the UK) over the year :

(£'000)	31 December 2022	31 December 2021	Variance
<b>Premiums Written</b>			
Gross	202,056	226,311	(24,255)
Net	202,056	226,311	(24,255)
<b>Claims Incurred</b>			
Gross	327,843	408,369	(80,526)
Net	327,843	408,369	(80,526)
<b>Expenses</b>			
Overhead Expenses	10,053	9,247	806
Investment Management Expenses	34,370	33,846	525
Total Expenses	44,424	43,093	1,331

As SLA's products are comprised of investment contracts held in pension wrappers the underwriting performance does not materially impact SLA's income or risk profile. Income is generated from the charging of fixed annual and event based fees. Please refer to Section C for the impact on the risk profile.

Premium income is received through:

- The payment of pension contributions
- Transfers into self-invested personal pensions (SIPP) and similar self-invested products
- New investments into trustee investment plan (TIP) contracts

Claims result from:

- The drawing of retirement benefits
- Dis-investments from TIPs
- Transfers out to other pension products offered by the Suffolk Life group or other pension providers
- Payment of pension death benefits.

Expenses for SLA are split between the overhead expenses borne by SLA and the investment management expenses which are paid by policyholders from the unit linked fund.

## A3 Investment performance

Assets held to cover technical provisions are selected by policyholders, or their appointed advisers, or where applicable, by asset managers selected by the policyholders and appointed for the purpose by SLA. The assets are legally and beneficially owned by SLA. SLA is required to maintain assets to match its policyholder liabilities at all times.

The following assets are held to cover technical provisions for unit linked liabilities.

(£'000)	31 December 2022	31 December 2021 (restated)	Variance
<b>Assets held in unit linked policies</b>			
Investment properties	1,108,073	1,316,468	(208,395)
Debt securities and other fixed interest securities	44,736	42,284	2,452
Quoted shares and other variable yield securities	1,928,048	2,184,066	(256,018)
Deposits with credit institutions	378,746	376,856	1,890
Other Assets	12,066	12,960	(894)
<b>Total Assets</b>	<b>3,471,669</b>	<b>3,932,634</b>	<b>(460,965)</b>
Other payables	83,777	96,421	(12,644)
<b>Net Assets</b>	<b>3,387,892</b>	<b>3,836,213</b>	<b>(448,321)</b>

\*Figure updated from figure published in year end 2021 SFCR to align with year end 2022 statutory accounts. Comparatives unaudited in the current year

The following assets were held by SLA for the shareholders:

(£'000)	31 December 2022	31 December 2021	Variance
<b>Assets held by SLA</b>			
Deposits with credit institutions	4,876	6,855	(1,979)
Other assets	1,919	1,569	350



### A3.1 Information on income and expenses arising from investments over the reporting period

The following returns and expenses were incurred on the unit linked assets during the year:

(£'000)	31 December 2022	31 December 2021 (restated)	Variance
Investments for the benefit of policyholders			
Rental income	81,239	69,365	11,874
Interest received	2,297	2,440	(143)
Investment income on equities and collective investments	35,075	29,252	5,823
Investment and administration expenses	(34,371)	(33,846)	(525)
Net realised (losses)/gains on investments	(29,834)	30,802	(60,636)
Net unrealised (losses)/gains on investments	(376,939)	334,952	(711,891)
Total net investment (losses)/return	(322,533)	432,965*	(755,498)

\*Figure updated from figure published in year end 2021 SFCR to correct total. Comparatives unaudited in the current year

### A3.2 Information about any gains and losses recognised directly in equity over the reporting period

The following table sets out the changes in equity over the reporting period:

(£'000)	Share capital	Retained earnings	Total shareholders funds
Balance at 1 January 2021	1,700	178	1,878
Profit for the year	-	600	600
Dividend	-	(400)	(400)
Balance at 31 December 2021	1,700	378	2,078
Profit for the year	-	457	457
Share Capital Reduction	(1,699)	1,699	-
Dividend Paid	-	(2,200)	(2,200)
Balance at 31 December 2022	1	334	335

### A3.3 Information about any investments in securitisation over the reporting period

SLA was not exposed to any investments in securitisation over the period.

## A4 Performance of other activities

The Company's only activity is that of a unit-linked insurer.

The following income arose from the insurance activities of SLA:

(£'000)	31 December 2022	31 December 2021	Variance
Fees for the provision of SIPPS and similar self-invested products	7,255	7,384	(129)
Interest received	2,870	1,629	1,241
Commissions	534	738	(204)
<b>Total income</b>	<b>10,659</b>	<b>9,751</b>	<b>908</b>

The following expenses were incurred in SLA performing insurance activities:

(£'000)	31 December 2022	31 December 2021	Variance
Fees for administration services	9,380	8,542	838
Regulatory Fees	309	279	30
Audit and actuarial fees	275	279	(4)
Other expenses	89	147	(58)
<b>Total expenses</b>	<b>10,053</b>	<b>9,247</b>	<b>806</b>

The fees for administrative services represents the fee paid to Suffolk Life Pensions Limited ('SLP') for the provision of administration services. The contract between SLA and SLP allows for the Regulatory Fees and Audit and Actuarial fees in the above table to be deducted from the total administration services fee paid to SLP.

## A5 Any other information

There are no other material aspects to disclose which are not covered in the above sections.

# SECTION B SYSTEM OF GOVERNANCE

## B1 General Information on the system of governance

SLA's system of governance encompasses the overall framework and structure adopted to ensure it meets the requirements of a robust risk management function. This section of the report aims to provide details of the overarching risk management framework, alongside the key roles, responsibilities and committees providing oversight and direction to the SLA Board.

### B1.1 Structure of the SLA System of Governance

The Group Chief Executive Officer (SMF1) is responsible for running the business on a day to day basis, as authorised by the SLA Board. Material decisions are discussed monthly by the Executive Committee (ExCo), and escalated to the SLA Board when required. The SLA Board meets as a minimum four times a year. In the period where there was an absence of a SMF1, this responsibility was vested with the Chief Financial Officer and Chief Operating Officer.

The ExCo is responsible for the governance of SLA, SLP and other entities within the Curtis Banks Group, and items affecting all areas of the business are discussed. These are then escalated to the relevant Board on a quarterly basis.

### B1.2 SLA System of Governance

A summary of the SLA System of Governance is set out below. Further details are provided within the SLA System of Governance document called the Responsibilities Map.

The SLA Board is committed to high standards of corporate governance. The SLA Board has appointed an independent Actuarial Function Holder and completes an annual review of Governance and its committee structures or more frequently whenever there is a material change in the business which requires a change to the system of governance.

### B1.2.1 SLA Board of Directors

The following were members of the SLA Board or held a SMF Function as at 31 December 2022 and up to the date on which the SFCR was signed:

Name		
Dan Cowland	SMF2	Chief Finance
Susan McInnes	SMF12	Chair of the Remuneration Committee
Alastair James Clarkson	SMF9	Chair
William John Rattray	SMF10 SMF11 SMF14	Chair of the Risk Committee Chair of the Audit Committee Senior Independent Director
Jane Ann Ridgley	SMF24	Chief Operations
Pete Docherty (appointed 10 January 2023)  Prescribed Responsibilities temporarily held by existing SMFs, Jane Ann Ridgley, Dan Cowland, and James Keely.	SMF1	Chief Executive
James Keely	SMF4 SMF16 SMF17	Chief Risk Function Compliance Oversight Money Laundering Reporting Officer (MLRO)
Gordon Craig Wood	SMF20	Chief Actuary
David Barral	SMF7	Group Entity Senior Manager

### B1.2.2 Roles and Duties of the SLA Board

The SLA Board meets quarterly with additional Board meetings being convened to meet business needs, The Board of Directors carries the responsibility for the oversight of the business and sets its strategy and risk appetite. SLA has a schedule of agenda items which identifies the regular and standing items that are considered at each Board meeting.

At each quarterly Board meeting the SLA Board receives a business update from the Group Chief Executive, which contains key updates regarding Sales, Operational and Property administration performance, IT and HR. The Chief Financial Officer and the Chief Risk Officer also provide the Board with financial and risk & compliance reports.

The Executive Committee (ExCo) is delegated responsibility by the Group Boards for the governance of the regulated entities of the Curtis Banks Group, and items affecting all areas of the business are discussed. Items are escalated to the relevant Board on a quarterly basis. There is a defined schedule of matters reserved for the SLA Board and those matters which are not reserved are delegated to the relevant Governance Committees. The following are direct sub-committees of ExCo:

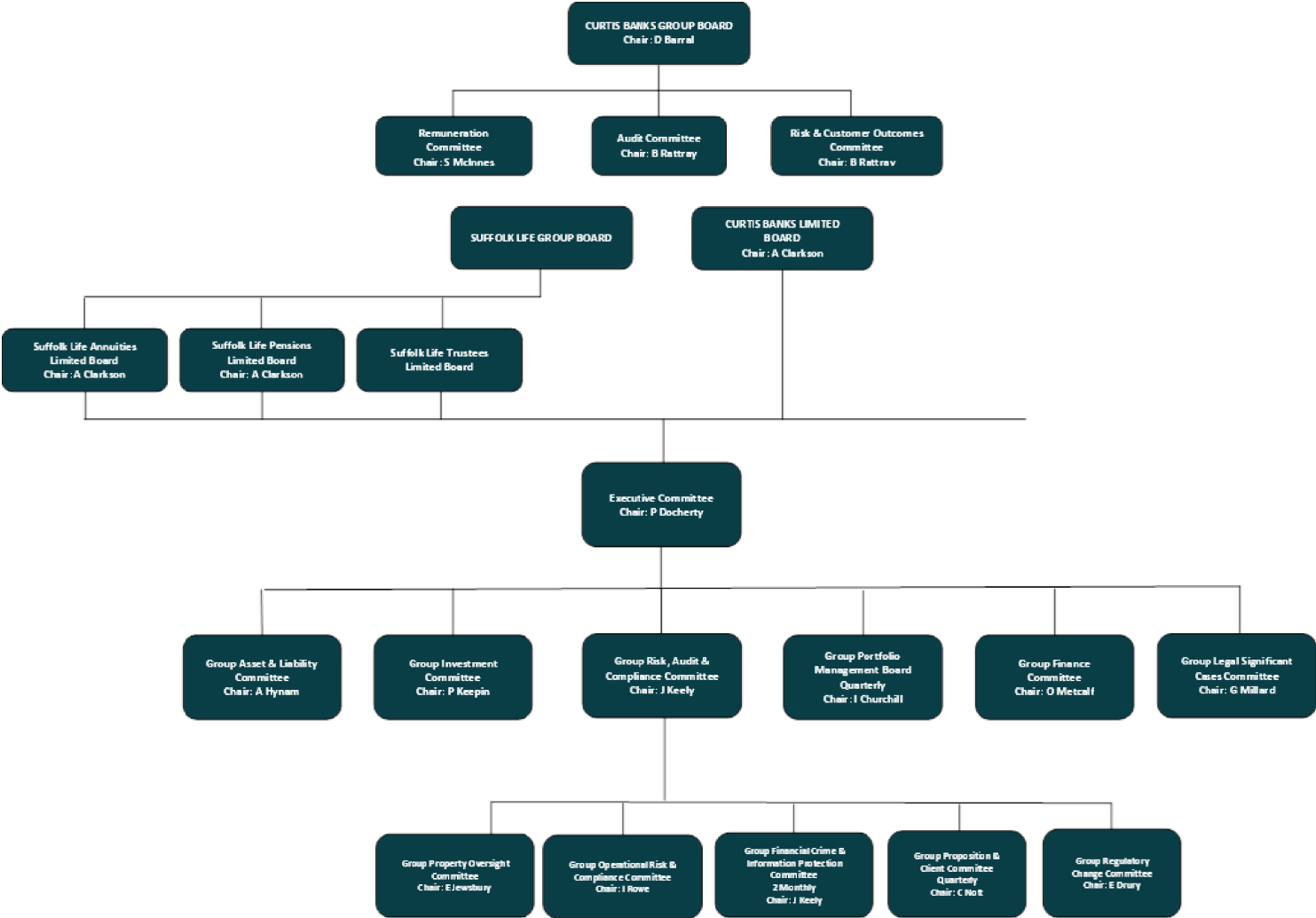
- Group Risk, Audit & Compliance Committee
- Group Asset and Liability Committee
- Group Finance Committee
- Group Investment Committee

- Group Portfolio Management Board
- Group Legal Significant Cases Committee

There are also further sub-committees as outlined below in B1.2.3. Each sub-committee operates under a defined terms of reference.

### B1.2.3 SLA Board Committees

The Curtis Banks Group committee structure is outlined and detailed below:



Committee Name	Role Overview
Group Risk, Audit & Compliance Committee (GRACC)	The GRACC's primary role is to ensure that appropriate processes are in place across the Curtis Banks Group to identify, assess, monitor and control areas of risk. The GRACC is not a decision making forum but is a first line oversight committee. It will ratify proposed changes to risk frameworks and risk mitigations, and inform senior management in their decision making, for example when accepting risks. The Committee also has oversight of Solvency II developments
Group Asset and Liability Committee (GALCO)	GALCO provides oversight of the credit, insurance and investment (including counterparty and liquidity) risks to which the Curtis Banks Group is exposed and to oversee the effectiveness of group systems and controls in place to ensure it remains within risk appetite
Group Finance Committee (GFC)	GFC provides oversight of the financial performance of the company and the Curtis Banks Group of companies as a whole against budgets and forecasts, other key business performance indicators as well as details of capital coverage against internal coverage ratios
Group Investment Committee	The Group Investment Committee provides oversight of the adherence to the relevant allowable investment schedule and the impact of all relevant legislation in respect of investments undertaken through SIPPs and similar self-invested products
Group Change Committee (GCC)	The GCC provides oversight of the Group's change programme and associated budgets
Group Legal Significant Cases Committee (GLSCC)	The GLSCC is accountable for delivery of the Group's obligations pertaining to all matters relating to legal transactions within our pension schemes. Significant cases are referred to the committee to ensure appropriate oversight or direct action from relevant operational departments because they present a clear legal and associated commercial risk to the organisation.

#### B1.2.4 Risk Management

The internal control system comprises a three lines of defence model, whereby first line manage risks, second line oversee and challenge the management of risk and third line provide independent assurance that risks are effectively managed and there is appropriate oversight in place.

The risk governance framework enables the various group Boards to be satisfied that the risks to which the Group may be exposed are being appropriately identified and managed, and that the risks of significant financial loss or damage to our reputation are being minimised.

Compliance with the requirements is supported by the assurance that key elements of the control environment are kept under review and that all matters arising are recorded and reported within the risk management framework. A groupwide Operational Risk Management System is fully embedded to support this.

### B1.3 SLA Governance changes over the period

During the year, the following changes have been made to the SMF roles:

SMF Role Affected	Old Holder	New Holder
SMF1 - Chief Executive	William Self (up until 08/08/2022)	Peter Docherty from 10/01/2023 ** Temporarily held by David Barral as Executive Chair prior to this appointment
SMF9 - Chair	Christopher Macdonald (up until 26/05/2022)	Alastair Clarkson from 21/12/2022 ** Temporarily held by David Barral as Executive Chair prior to this appointment
SMF12 - Chair of the Remuneration Committee	Louis Jules Hydleman (up until 26/05/2022)	Jill Lucas (07/12/2022 - 9/12/2022). Susan McInnes from 13/12/2022 **
SMF3 - Executive Director	Nigel Rogers (up until 31/03/2022)	N/A
SMF7 - Group Entity Senior Manager	N/A	David Barral from 14/12/2022

\*\* Prescribed Responsibilities were temporarily held by existing SMFs

### B1.4 Remuneration policies

The Remuneration Committee, Chaired by the SMF12 function holder, is responsible for the Remuneration Policy for SLA and the wider Curtis Banks Group. This involves making recommendations to the SLA Board in reviewing the policy, and ensuring it remains compliant with Solvency II guidelines. Employee salaries are set according to strict criteria, including consideration of:

- The contribution made towards achieving business objectives, in line with the principle of paying for performance
- The performance of the wider Group against its targets and taking into account its risks
- The value placed on comparable jobs within the wider Group
- The market rate for comparable jobs in other companies

Variable remuneration may be payable in the form of a discretionary cash bonus a proportion of which is deferred for three years. These are principally linked to achievement of predetermined objectives laid down at the start of the previous calendar year and broader business performance. The relative importance of the different elements and the performance criteria are determined in advance. As part of this, attention is paid to Senior Managers that are subject to certain performance criteria and the responsibilities they hold in the performance of their duties. There are no incentives on the SLA Board to exceed risk appetite in pursuit of greater reward. The risk strategy is set in advance and no financial incentives (including early retirement schemes) or otherwise are awarded for taking risks outside of appetite.



### **B1.5 Material transactions over the period**

During the period dividends totalling £2,200k were paid to Suffolk Life Group Limited which was then subsequently paid up to Curtis Banks Group Plc. No other material transactions took place during the period.

### **B1.6 Adequacy of systems of governance**

The group wide governance structure is reviewed on an annual basis.

The Terms of Reference are updated annually to reflect the apportionment of responsibility and ensure clear channels of decision making are in place.

## **B2 Policies and processes to ensure persons in the key functions are fit and proper**

### **B2.1 Overview**

SLA maintains procedures for ensuring that Board members and individuals responsible for key governance functions are 'fit' (i.e. have appropriate qualifications, knowledge and experience) and 'proper' (i.e. they are of good repute and integrity).

### **B2.2 Determining an individual's Fitness and Propriety**

SLA has regard to a number of factors when assessing the fitness and propriety of its approved persons. The responsibilities placed on senior management are articulated under the Senior Managers & Certification Regime (SM&CR). The key considerations for SLA are:

- Honesty, Integrity & Reputation
- Competence & Capability
- Financial Soundness

A defined policy and process is in place to ensure that the fitness and propriety of applicants is carefully considered before an application to the Regulator is submitted for approval. The SLA Board will not support an application for approval or a notification if it believes that the candidate fails to meet any element of the fit and proper test.

These criteria are also important when assessing the continuing fitness and propriety of approved persons and SMF function holders. From time to time, and at least annually, individuals will be required to certify that there has been no change to the information provided at the point of approval and consequently, the fitness and propriety status remains unchanged.

The Group also employs the following procedures to assess fitness and propriety:

- Performance against internal policies and procedures;
- Disclosure and Barring Service (DBS) checks;
- Annual CPD completion requirements
- Annual performance reviews, and
- Annual self-attestation, with sign-off by the Chief Executive Officer or Chief Risk Officer

### **B2.3 Outsourced Key Functions**

The SLA Board outsources certain functions where this can provide enhanced technical skill and greater expertise than if the function remained in-house. Details of the outsourced functions are detailed in section B7.

## **B3 Risk management system including own risk and solvency assessment**

### **B3.1 Risk Management System Overview**

Risk exposures are recorded on departmental Risk Registers and discussed at the appropriate Governance Committee. A regular assessment of key controls and mitigating risk factors is performed by business management. Key risks and mitigating actions are escalated to the Group Risk, Audit & Compliance Committee on a monthly basis if required. The risk framework helps manage the approach to risk based capital requirements.

### **B3.2 Risk Governance**

The Group Risk Management Framework comprises six key areas:

1. Risk Appetite - Sets out the high-level attitude to risk and provides some considerations in forming the ranges and limits of acceptable risk taking to be agreed by the SLA Board
2. Risk and Control Monitoring - Controlling and monitoring the risk so as to ensure that the company is only exposed to risks that are within appetite and pre-determined tolerances
3. Risk Identification & Assessment - Tools that help managers identify and evaluate the risks to which SLA or the wider Group may be exposed. This includes discussion and challenge regarding the annual stress test scenarios for the ORSA document
4. Risk Management Information - How ongoing and emerging risks are reported and reviewed, and assessment of actual risk positions relative to the risk targets and limits that have been set
5. Risk Oversight - Review and challenge of how the company identifies and manages risk in line with Regulatory requirements and Board expectations, by the Head of Risk and Chief Risk Function Holder
6. Risk Committees - Governance committees are the forums where key risks are reviewed and risk management strategies are developed. The Group Risk, Audit & Compliance Committee, the Executive Committee and the SLA Board oversee the management of risks and challenge whether the risk framework is effective

### **B3.3 Risk Strategy, Appetite and Policy**

SLA adheres to the Group Risk Management Framework. SLA has limited tolerance for significant operational losses due to the likely reputational damage and costs associated with these. SLA aims to implement effective controls to reduce operational risk exposures, except where the costs of such controls exceed the expected benefits.

### **B3.4 Risk Identification and Assessment**

Business managers are responsible for identifying and assessing the risks in their area. A structured framework has been established to support the identification and assessment of risk. The second line risk team facilitates the process of risk identification and assessment and provides objective review and challenge.

Risks are identified through a 'bottom up (business management view) & top down (Board view)' review process. The risks are assessed in terms of their impact on customers, profits, balance sheet, reputation and strategic objectives. These are also monitored through the relevant governance committees. The risks and mitigating actions are recorded using risk registers. Items remain on risk registers until they no longer present a significant risk, irrespective of the likelihood.

### **B3.5 Risk Management, Monitoring and Assurance**

SLA and the wider group have in place formal, documented controls across different areas of the business. These are monitored by the business owner of the control and sign-off is confirmed to the Risk function on a monthly basis. The controls provide senior management with the assurance that controls to manage the risks associated with the operation of business processes are performing as intended and remain fit for purpose.

These supplement the documented processes within the internal procedures manual. These procedures cover details of processes by team, and are part of the first line of defence in protecting underlying policyholders. This ensures certain risk management responsibilities are embedded at individual team manager level.

Items remain on a risk register until they no longer present a significant risk (irrespective of likelihood). Certain risks are either by their nature not capable of mitigation, or the costs of mitigation are disproportionate to the level of expected loss that may arise over a given timeframe. For such risks, the ExCo, as ratified by the SLA Board, may decide that it is prepared to accept the risk. This risk must remain within SLA's appetite or additional remedial action must be taken. Any high impact risks are escalated initially to the Group Risk, Audit & Compliance Committee, and onto the SLA Board if required.

SLA's capital position is monitored on a monthly basis and forms part of the financial management information that is reviewed by the Group Finance Committee, SLA Board and group Boards.

### **B3.6 Risk Reporting and Escalation**

A structured framework is in place to support the business with the identification and assessment of risk. The Chief Risk Officer and Risk department support the process of risk identification and assessment, and provide objective review and challenge.

Risks are assessed on an inherent basis (i.e. if no controls were in place to reduce the level of risk) and then the mitigating controls should be considered. The risk should then be assessed and scored with respect to the impact and likelihood that it will arise given the controls which have been put in place (the residual risk).

Risk assessment takes into account many factors including previous risks, incidents and their treatment as well as the results of investigations, reviews and gap analysis. Likewise similar factors should be taken into account in assessing mitigating controls, which should also consider design and actual performance of the control. The residual risk is then reviewed against risk appetite and an appropriate response determined.

The risks are identified through a 'bottom up (business area view): top down (Board view)' review process. The risks are assessed in terms of their impact on policyholders, profits, balance sheet, reputation and strategic objectives. These are also monitored through the relevant governance committees. The risks and mitigating actions are recorded using departmental risk registers. Items remain on a risk register until they no longer present a significant risk (irrespective of likelihood)

SLA accepts that no controls are fail-safe and that things can go wrong. SLA seeks to identify and resolve issues at the earliest opportunity through a robust control environment. SLA considers the most appropriate form of action to take to mitigate or close risks. This could be one of four actions:

- Treat (i.e. mitigate) the risk
- Tolerate (i.e. accept) the risk
- Transfer (i.e. pass on the risk to another party), usually through an appropriate form of insurance contract
- Terminate (i.e. stop carrying out the activity that is creating the risk)

### **B3.7 Risk Management Culture**

For the risk management framework to operate successfully, the business needs to rely on the culture and behaviours within the business. The risk aware culture in place within the Group is based upon the following principles:

- There is openness and transparency in how decisions are made and risks managed
- All significant business decisions should be aligned with the Group's strategy
- Business managers own the risks and risk management processes associated with the activities for which they are responsible. They must aim to manage these without errors in their processes
- It is acknowledged that no system of control is fail-safe and that risk events will occur. Managers must report these and address them in good time using the appropriate risk management system
- Individuals make decisions within delegated authorities. A robust governance structure enables decision makers to make informed decisions for complex matters
- Risk oversight committees are forums for managers to review and challenge how key risks are identified and managed within the risk framework, and agree extensions or limitations of risk appetite

## **B4 Internal Control System**

The SLA Board has overall responsibility for ensuring that an adequate and effective system of internal control is maintained in the company. In practise the oversight and management of these systems involves participation of the Boards, Board Committees, Senior Managers, Risk & Compliance, Finance and business managers.

The internal control system is designed to manage or mitigate, rather than eliminate the risk. The internal control system enables SLA and the wider group to operate efficiently and respond to any significant or evolving risks that could prevent or limit the achievement of business objectives and strategy.

### **B4.1 Risk**

The Risk function provides confidence to the SLA Board that the business is effectively managing its day-to-day risk exposures. The internal control system comprises a three lines of defence model, whereby first line manage risks, second line oversee and challenge the management of risk and third line provides independent assurance that risks are effectively managed and there is appropriate oversight in place.

The Risk function engages with the business to evaluate risks, and then assists the SLA Board in decisions of whether to terminate, treat, transfer or tolerate the given risk. This in turn protects customers, SLA and the wider Group from potential detriment that could be financial, reputational or outside of risk appetite.

The Chief Risk Officer (SMF4) is a member of the ExCo and SLA Board. A report is provided at each meeting confirming the status against newly crystallised risks, ongoing inherent risks, and any other items of note from a risk perspective. These are monitored to resolution, and if necessary provided to the Curtis Banks Group Plc Board for information.

Key risks of an agreed impact or likelihood are escalated monthly to the GRACC from respective departmental Committees, where they are discussed and management actions put in place, if necessary, to mitigate or eliminate the risk.

All staff within the group are responsible for notifying the Chief Risk Officer of any breach of applicable laws and regulations that fall within the scope of their responsibilities. Upon receipt of notification, the Chief Risk Officer records the relevant breach in the Company's breach register and discusses remedial actions with the business. Where material, reporting is made to the GRACC and SLA Board.

### **B4.2 Compliance**

The Compliance Function is part of the Group's overall corporate governance structure. It is responsible for the monitoring, managing and reporting of the compliance risks to which the Company is exposed. Reports are issued to the Board and the GRACC assessing the effectiveness and adequacy of compliance within the group.

## B5 Internal Audit Function

The Internal Audit Function is outsourced to Mazars, who have delegated responsibility to ensure an effective internal audit function is in place, including an evaluation of the adequacy and effectiveness of the internal control system, with findings reported to the Board if necessary.

The scope for the internal audit reviews is determined by the business strategy as well as an ongoing assessment of the key risks facing the Group and how well these risks are being managed. Outsourcing this role provides comfort to the SLA Board that matters of audit focus are free from influence, including audit scoring and communication of results. Any conflicts of interest that may influence objectivity or independence are managed accordingly.

## B6 Actuarial function

This function (SMF20) is outsourced to Grange Consultancy Limited, previously EY up to August 2022, who provide actuarial support and challenge to both the quantitative and qualitative data that forms the Solvency II return and the underlying assumptions approved by the SLA Board. This ensures the appropriate skill and expertise is applied to assist the SLA Board in performing this key function.

The function reviews the calculation and methodology behind the Quantitative Reporting Template (QRT) data (e.g. Technical Provisions/SCR/MCR) and seeks evidence that data is calculated in line with Solvency II guidelines. The Chief Actuary ensures this by maintaining clear and regular communication with the SMF2 and SMF4 function holders, by attending the SLA Board meetings, and regularly providing challenge and other expertise in relation to the SMF20 function where required.

## B7 Outsourcing

The following functions were outsourced as at 31 December 2022:

- Pension scheme administration to Suffolk Life Pensions Limited (SLP), a sister company fully owned by Suffolk Life Group Limited. SLA considers SLP to be providing a critical service as scheme administrator and as such consideration is given on an annual basis by the SLA Board as to whether the 'Insourcing Agreement' remains current, appropriate and commercially viable. SLP operates from the same offices as SLA
- One of the Key Functions under Solvency II (the Chief Actuary role), is outsourced to Gordon Wood of Grange Consultancy Limited, who previously held the SMF20 role for SLA at EY up to August 2022. The Chief Actuary works with the Chief Risk Officer to provide appropriate challenge to the models, assumptions and methodologies used under Solvency II reporting
- The Internal Audit Function is outsourced to Mazars. Mazars have delegated responsibility to ensure an effective internal audit function is in place, including an evaluation of the adequacy and effectiveness of the internal control system, with findings reported to the Board if necessary. There is no requirement for a firm of SLA's size to assign the specified SMF function to an individual at SLA

## B8 Any other information

There are no other material aspects of the system of governance which are not covered in the above sections.

## B9 Own Risk and Solvency Assessment (ORSA)

SLA completes as part of its annual reporting process an ORSA report. The ORSA report provides data that SLA can use as part of its wider risk management strategy, primarily in the form of post-stress test capital position results. These results assist the SLA Board in forming the key risks, and whether these fall within the defined risk appetite for the coming year. The results also promote Board level discussion of developments in the industry that SLA operates within. These discussions in turn assist the SLA Board in reviewing the key risks, thus adopting a pro-active approach to the risk appetite setting cycle.

The ORSA assessment is forward-looking, in that it considers the current business and risk profile as well as any anticipated external influences. This ensures that SLA can meet the Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR) on an ongoing basis, although this is assessed on a more frequent basis as part of the monthly Group Finance Committee and ExCo. SLA has a risk appetite to maintain a capital buffer of 130% of the SCR or MCR depending on which metric is higher.

The ORSA also sets out details of how the SLA Board decides on the appropriateness of the Standard Formula Model for the business that SLA operates. The SLA Board believes that the use of the Standard Formula appropriately fits the risk profile of the business that SLA writes, being unit-linked funds (known as property-linked funds under Solvency I).

It is also the Board's view that the Risk Margin required to be calculated under Solvency II, artificially reduces Own Funds and is in excess of the true capital required to match the risk in the business. The assessment of own solvency requirement therefore removes the Risk Margin from the calculation of Own Funds in the ORSA.

The ORSA process is aligned with the Group Risk Management Framework and is a fundamental tool in assessing the respective risks to strategy both now and in the future. It is a circular process that compliments the annual business strategy review, and it relies on the following elements of the business:

- Board strategy
- The Solvency II Pillar I Balance Sheet standard formula model results, and base assumptions used
- The Board who review, challenge and approve the test scenarios included in the ORSA output
- The Finance function who run the tests on the Balance Sheet, for capital adequacy and produce the resultant output
- The Risk & Compliance Function and Actuarial Function who assess the outputs and prepare the reports;
- The Board's assessment of the output and resultant capital. Strategy and risk appetite review,
- ORSA reporting to the Regulator

The diagram on the next page depicts the cycle adopted.





# SECTION C RISK PROFILE

SLA operates in a low risk environment. This is primarily driven from the business being unit linked, with no guarantees, with the investment risk being borne by the policyholder. The risk to SLA is further reduced by income being generated from the policies via fixed monetary fees. As such income is not dependent on the value of the underlying assets held in the unit linked contracts.

For the calculation of the Solvency Capital Requirement, the Standard Formula Model has been assessed as being appropriate for the risk profile of SLA. SLA has a combined Standard Formula SCR of £2,670k. Pre-diversification and before taking an allowance for the loss-absorbing capacity of deferred taxes, the SCR is £3,939k.

(£'000)	31 December 2022	31 December 2021	Variance
SCR (before diversification)	3,939	4,158	(219)
<i>less</i> Diversification Module - Market risk	0	0	0
<i>less</i> Diversification Module - Life underwriting risk	(28)	(90)	62
<i>less</i> Intra-module diversification	(351)	(485)	134
<i>less</i> Allowance for LACDT	(890)	(896)	6
<b>SLA SCR</b>	<b>2,670</b>	<b>2,687</b>	<b>(17)</b>

## Risk profile and drivers

The risk profile for SLA is comprised of the following risks:

1. Life Underwriting Risk
2. Market Risk
3. Credit Risk
4. Liquidity Risk
5. Operational Risk
6. Regulatory Risk

Each of these risks is considered in detail in the following sections.

Each of these risks is driven by a distinct factor. Policy numbers drive Life Underwriting Risk and Operational Risk. The Interest Rate Risk sub module within Market Risk is driven by changes in the risk free rate. The remainder of Market Risk and Credit Risk are driven by the investments held for SLA Shareholders.

## Change in the risk profile over the period to the 31 December 2022

The table below details the risk profile for SLA as at 31 December 2022.

(£'000)	31 December 2022	31 December 2021	Variance
Market risk SCR Module	793	805	(12)
Life underwriting risk SCR Module	281	641	(360)
Operational risk SCR Module	2,510	2,294	216
Counterparty default risk SCR Module	327	328	(1)
Diversification	(351)	(485)	134
Allowance for deferred tax liability offset	(890)	(896)	6
<b>SLA SCR</b>	<b>2,670</b>	<b>2,687</b>	<b>(17)</b>

## C1 Life Underwriting risk

As SLA products are comprised of investment contracts held in pension wrappers the exposure to life underwriting risk is limited to the expense and lapse risk modules within the Standard Formula.

The exposure to expense risk for SLA is driven by an unexpected increase in the costs incurred in the operation of the business. The administration of policies is outsourced to SLP. The costs incurred by SLA under the administration agreement are linked to the policy fees charged by SLA to policyholders which are of a fixed monetary value. The agreement does not allow for any unexpected changes and as such the administration fee is not exposed to the standard formula scenario. The remaining exposure to expense risk to SLA is from the costs incurred from regulatory fees, audit fees and the fee for the outsourcing of the actuarial function. In the calculation of the SCR these are stressed in line with the standard formula calculation.

Exposure to lapse risk for SLA occurs from either an unexpected increase to the lapse rate or a sudden mass lapse of policies. This reduces the policies in force resulting in a loss in future income, reducing the value in force which increases Technical Provisions. The agreement between SLA and SLP includes a clause that allows the administration fee to be reduced in the event that SLA experiences a lapse up or mass lapse event.

In the modelling of Technical Provisions, mortality is treated as a lapse when the beneficiary of a pension policy chooses to take a lump sum death benefit rather than continue taking an income from the policy. If the beneficiary chooses to continue taking an income the policy will remain in force.

SLA has assessed its capital at risk to be nil (2021: nil) as reported on QRT 26.01.01. This is due to the specialist nature of the pension products written by SLA. On the death of the policyholder SLA offers the beneficiaries all the available options from a pension contract, including the option to continue taking an income from the policy. In the event of the death of all SLA policyholders a number of the beneficiaries would continue taking benefits leaving the contract in place. SLA would continue to receive fee income from these policies not placing any of the capital held by SLA at risk.

### C1.1 Underwriting risk at 31 December 2022

The life underwriting risk for SLA moved from £641k for the year ending 31 December 2021 to £280k for the year ending 31 December 2022.

### C1.2 Change in the underwriting risk over the period to the 31 December 2022

The main change in the risk profile for the market risk module is due to a decrease in future cash flows (non-unit linked BEL) from an increase to the risk free rates over the reporting period.

### C1.3 Risk appetite and tolerance statement

As mentioned in section C1, the policies written by SLA are all unit-linked long-term contracts. SLA has no appetite towards underwriting risk, and as such does not look to offer any guarantees on its current book of business. The future risk appetite is cautious toward this type of risk, primarily because the SLA Board does not see the risk being worth the potential benefits, and there are no plans to establish any new products comprising of this risk for SLA in the short-term.

## C2 Market risk

Market risk arises from the level or volatility of market prices of financial instruments. Exposure to market risk is measured by the impact of movements in the level of financial variables such as stock prices, interest rates, immovable property prices and exchange rates. The products that SLA writes are unit-linked, with the market risk arising from the assets held in these contracts being borne by the policyholder. As the income received from SLA is based on a fixed fee, rather than a percentage of assets held in the unit-linked contracts, SLA's income is not exposed to most market risk.

SLA is primarily exposed to market risk from the movement in the risk free rates used to model the value of in force business. Increases in the risk free rate will result in future cash flows being discounted more heavily reducing the value in force.

### C2.1 Market risk at 31 December 2022

The £793k market risk requirement for SLA is driven by interest rate risk. This has decreased from £805k as 31 December 2021.

### C2.2 Change in the market risk over the period to 31 December 2022

The main change in the risk profile for the market risk module is due to a decrease in future cash flows (non-unit linked BEL) over the reporting period.

### C2.3 Risk appetite and tolerance statement

All contracts and products offered by SLA are unit-linked in nature, with any market risk being borne by the policyholder. The policyholder (and their financial adviser or asset manager, if applicable) make the investment choices and as such bear the loss or benefit from the gain in fund value.

SLA has a low appetite for risk towards the investment of Shareholders assets. SLA, as part of the wider Group, generates bank interest from the deposit accounts Shareholder funds are held in, and looks to hold capital of at least 130% of its capital requirement. SLA is still able to generate income on these funds despite the low interest economic climate. The SLA Board does not view taking additional risk in holding investments other than cash in deposit accounts as sufficiently rewarding, given that the economic environment is still uncertain and volatile. Therefore, this appetite is unlikely to change in the short-term.

## C3 Credit risk

Credit risk is the risk that SLA is exposed to lower returns or loss if another party fails to perform its financial obligations. SLA is exposed to credit risk from the failure of the institutions that hold the cash reserves that make up Shareholders assets. Credit risk arising from the investments that makes up the unit linked fund is borne by policyholders.

### C3.1 Counterparty Default Risk

SLA is exposed to Counterparty Default Risk from the depositing of shareholder assets with a number of banking counterparties. The £327k (2021: £328k) of Counterparty Default risk for SLA is driven from £4,876k of cash (2021: £6,855k) being held in A and AA rated credit institutions.

### C3.2 Change in the counterparty Default risk over the period to 31 December 2022

There was a decrease of £1k in counterparty default risk over the period to 31 December 2022 driven by the lower cash balances being held and a change to the credit rating profile of the banking counterparties.

### C3.3 Risk appetite and tolerance statement

All cash deposits held by SLA are subject to pre-approval by the Group Assets & Liabilities Committee ('GALCO'). The amount of exposure to any individual counterparty is subject to a maximum limit defined under the Curtis Banks Group Treasury Framework, thus mitigating the risk of a single institutional default. The exposure limit is considered monthly by GALCO along with an assessment of the credit rating. Mitigating actions are taken when considered necessary. GALCO only consider holding deposits with Investment Grade institutions or higher.

The SLA Board may consider using alternative banking institutions in the future, although this is dependent on the overall banking environment. If there is a limited pool of Investment Grade institutions, careful analysis and consideration would be undertaken regarding the use of alternative providers. These may be considered under a lower exposure limit.

## C4 Liquidity risk

SLA takes no benefit from 'expected profit included in future premiums' as its charges are fixed and activity based, rather than on a premium or asset basis. Any monies paid into SIPPs by its policyholders become part of the unit-linked contract. SLA therefore only has liquidity risk in relation to meeting its own short-term financial obligations.

### C4.1 Risk appetite and tolerance statement

The SLA Board has very limited appetite towards liquidity risk. SLA takes into account the regulatory capital that it is required to hold and the liquidity of the chosen investments. SLA maintains funds (as mentioned in section C3) in deposit accounts with banking institutions rated at Investment Grade and above. SLA accepts that exposure can arise as a consequence of the markets in which it operates and has no appetite to fail to meet its obligations as they fall due.

Liquidity risk is assessed as part of a wider assessment of risks posed to the Own Funds of SLA and managed accordingly. Should the available funds fall outside of SLA's risk appetite, SLA has in place management actions that can be implemented including:

- Access to additional capital from the wider Curtis Banks group
- As part of the agreement with SLP in relation to the administration services SLP conducts on its behalf, there is flexibility in respect of the payments due if certain events were to impact SLA (e.g. a mass lapse event).

## C5 Operational risk

Operational Risk is defined as the risk of loss arising from inadequate or failed internal processes, personnel or systems, or from external events. For SLA this risk is primarily driven from the outsourced administration performed by Suffolk life Pensions Limited.

The operational risk requirement for SLA was £2,510k as at 31 December 2022. This requirement increased over the period from £2,294k as at 31 December 2021 due to the increase in expenses.

### C5.1 Risk appetite and tolerance statement

Operational Risk for SLA is one of the major components of the SCR. As such, good control over loss arising from inadequate internal controls is of paramount importance to SLA. The SLA Board are comfortable with the low and stable level of Operational Risk taken as part of running the business, but are keen to avoid major stresses to the SCR that may impact its ability to maintain capital coverage at over 130% of its SCR.

This risk is also linked with Group Risk, given that the administration for SLA's products is carried out by a fellow subsidiary company, SLP. Given the nature of the company's business model, SLA has to accept certain risks with the administrative services provided by SLP to SLA. These risks are controlled through the group governance structure (see section B1.2.3).

## C6 Other material risks

Other risks that are not considered in the Standard Formula but are materially different in the ORSA are covered below.

### C6.1 Regulatory Risk

SLA operates in a highly regulated and specialist industry and therefore is susceptible to any significant regulatory or legislative policy changes from a variety of regulatory bodies. Any changes will influence the overall framework for the design, marketing and distribution of products, the acceptance and administration of business, and the regulatory capital that is required to be held.

The SLA Board regards compliance with regulation as fundamentally important and is continuously monitoring regulatory changes and industry opinion to ensure that it meets its regulatory obligations now and in the future. The SLA Board and wider Group set aside development budget at the start of each financial year to specifically address any regulatory changes that are on the horizon. Legislative updates are fully analysed and the business model adapted to meet any regulatory changes.

### C6.2 Material Risk concentrations

SLA is not exposed to any material risk concentrations.

### C6.3 Stress Testing

As part of the annual ORSA cycle, scenario and stress tests are conducted on SLA's Own Funds to ensure continued compliance with the SCR and MCR. The scenarios and stress tests are designed by the Group Audit committee and are focussed on specific one off business events which are related to key risks identified in the Committee's risk review. The following tests were conducted for the 2022 process:

1. In failing to exercise due skill, care and diligence and for not taking reasonable care in organising and controlling its affairs responsibly, SLA incurs a fine of £1.5m from the FCA and PRA in respect of failing to meet Principles for Business 2 and 3
2. A payment made by SLA is diverted to fraudsters, circumventing company controls. SLA must cover the loss of the payment in full, although this is limited by the cyber insurance cover. Reputational damage results in increased lapses for future years
3. To meet the development requirements of numerous regulatory change projects, a one off £2.5m spend on systems changes and an additional five technical staff are employed going forward
4. SLA, as a Data Controller, is deemed as failing to fulfil its obligations to protect its customer's personal data and the Curtis Banks Group receives a fine proportionate to the level of the breach. The ICO can impose fines of up to 20 million Euros or 4% of group worldwide turnover. The fine is set at 4% of Curtis Banks Group turnover for 2022
5. Due to the cost of living crisis, where the rental income is being used to service annual fees and loan repayments for commercial property holdings, these liabilities can no longer be met. Without property investments, we could expect clients to move to a simplified pension product, resulting in a mass lapse of 15%. Additionally lenders could take legal action for failing to service the loan, resulting in reputational damage and a further increase in property lapses, and thus policy lapses of an additional 5% (resulting in total lapses of 20%)
6. It is however prudent to conduct a reverse stress test to determine the number of policy lapses that would cause SLA to not be able to meet its own costs

The testing for each scenario was completed by adjusting the inputs into the balance sheet modelling by the impacts defined in the scenario.

The stress and scenario testing for the 2022 ORSA cycle has found that SLA continues to meet its SCR and MCR requirements over the three year planning horizon in all the completed tests.

### C6.4 Adherence to the Prudent Person Principle

The nature of SLA's products allows the policyholder to make their own investment decisions. To ensure the prudent person principle is adhered to, SLA's contracts set out that policyholders can only invest in assets included on a list of allowable investments. The allowable investments are set by the Board.

The investments made by policyholders are monitored by SLP, with oversight delegated by the SLA Board to the Group Investment Committee. Where the list of allowable investment is breached the policyholder is asked to sell the investment. If the policyholder fails to sell the investment then SLA has the contractual right to force a sale of the investment.



## C7 Any other information

### C7.1 Standard formula appropriateness

An assessment has been undertaken that determined that the standard formula was appropriate for the calculation of SLA's SCR.

Key points to note in the assessment of Standard Formula appropriateness are as follows:

- As the underlying principle of products that SLA writes is to allow policyholders self-investment via a unit linked fund, the majority of the insurance based risk faced by SLA is passed on to the policyholder
- The core risks to SLA's financial stability are through the recognition of future profits on the balance sheet via the non-unit linked BEL (value in force). As the volatility of the inputs into the calculation of the non-unit linked BEL pose the greatest risk to the available own funds, it has been concluded that the Standard Formula calculation provides the best fit for quantifying these risks
- The Standard Formula output for operational risk shows the largest deviation from the internally calculated basis. In this case, the Standard Formula gives a higher requirement than the internal calculation. Although higher this is seen to be appropriate to use as an offset to some of the risks not covered within the Standard Formula.

There are currently no planned strategic changes, that the Board is aware of, that will affect the risk profile of SLA over the medium term meaning the Standard Formula will remain appropriate for the calculation of SLA's SCR over the current planning horizon.

# SECTION D VALUATION FOR SOLVENCY PURPOSES

The valuation of assets, Technical Provisions and other liabilities for SII is broadly in line with the financial statements which are prepared by SLA on an FRS 101 basis. The following sections set out the basis for valuation and differences between the SII basis and the financial Statements.

SLA does not apply either the volatility adjustment or matching adjustment and no transitional measures are applied.

## D1 Bases, methods and main assumptions used for the valuation for solvency purposes for each material class of assets and the nature of differences with FRS 101 accounting policies

The table below provides details of all material classes of assets of SLA and their value under both Solvency II and the financial statements.

(£'000)	SII Basis	Financial Statements
<b>Assets held for index-linked and unit-linked contracts</b>		
Equities and Collective Investment Undertakings	1,928,048	1,928,048
Bonds	44,736	44,736
Property	1,108,073	1,108,073
Cash and Cash Equivalents	378,746	378,746
Debtors	12,066	12,066
Creditors	(3,860)	(3,860)
Accruals	(16,839)	(16,839)
VAT	(3,736)	(3,736)
Bank Loans	(59,342)	(59,342)
<b>Total Assets held for index-linked and unit-linked contracts</b>	<b>3,387,892</b>	<b>3,387,892</b>
<b>Investments (other than assets held for index-linked and unit-linked contracts)</b>		
Deferred Tax	1	1
Property (other than for own use)	0	0
Receivables	1,919	1,961
Cash and Cash Equivalents	4,876	4,876
<b>Total other Assets</b>	<b>6,796</b>	<b>6,838</b>
<b>Total Assets</b>	<b>3,394,688</b>	<b>3,394,729</b>

The only difference between the valuation of assets on the Solvency II (SII) basis and the financial statements is that accrued fee income is not recognised on the SII balance sheet. The accrual of future income is a FRS 101 accounting item only and has been included in receivables.

SLA also has an interest in two dormant subsidiary companies which are non-trading entities. The holdings in these entities are valued at £102 (2021: £102) which represents the adjusted equity basis of valuation.

The assets shown in the above table are valued using the following methodology:

### **Equities**

SLA determines the value of equities based on the observable market prices. Where a market price is not available the price of the assets will be set to zero following consideration by the Group Investment Committee. SLA does not have an internal pricing team, all prices are obtained from an independent third party, and this will either be the collective investment scheme manager or Thomson Reuters.

### **Collective Investments**

SLA determines the value of Collective Investments based on the observable market prices. Where a market price is not available the price of the assets will be set to zero following consideration by the Group Investment Committee. SLA does not have an internal pricing team, all prices are obtained from an independent third party, and this will either be the collective investment scheme manager or Thomson Reuters.

### **Bonds**

SLA determines the value of Bonds based on the observable market prices, inclusive of accrued interest and index linked, where applicable. Where a market price is not available the price of the assets will be set to zero following consideration by the Group Investment Committee. SLA does not have an internal pricing team, all prices are obtained from an independent third party, and this will either be the collective investment scheme manager or Thomson Reuters. Bond values include accrued interest income under both the Solvency II and FRS 101 of FRS 101 bases.

### **Property**

Property holdings in investment property are carried at fair value. They are valued by independent valuers on the basis of open market value as defined in the appraisal and valuation manual of the Royal Institute of Chartered Surveyors or by reference to the movement in a property index from the last purchase or valuation date.

### **Cash and Debtors**

Cash and cash equivalents include cash in hand, deposits held at call with banks, treasury bills and other short term highly liquid investments with original maturities of three months or less. The valuation of these assets follows the Solvency II fair value hierarchy. Debtors are recognised fair value. There is no difference between the Solvency II valuation and the FRS 101 of FRS 101 valuation.

### **Creditors, Bank Loans, Accruals and VAT**

Trade payables, bank loans, accruals and VAT liability are recognised at fair value. There is no difference between the Solvency II valuation and the FRS 101 of FRS 101 valuation.

### **Deferred Tax Asset**

The deferred tax asset held by SLA is in respect of the excess of depreciation over capital allowances for some fixed assets.

## D2 Bases, methods and main assumptions used for the valuation for solvency purposes for each material class of liabilities and the nature of differences with FRS 101 accounting policies

The value of the Technical Provisions corresponds to the amount that would have to be paid to transfer the insurance obligations immediately to another insurance undertaking. This value is calculated in line with Solvency II requirements as the sum of the Best Estimate Liability (BEL) and risk margin.

The BEL is calculated as the expected present value of all future cash flows associated with the insurance business based on market consistent economic assumptions and best estimate non-economic assumptions. The risk margin is calculated in line with the Solvency II requirements using the cost of capital method.

(£'000)	SII Basis	Financial Statements
Index-linked and unit-linked Best Estimate	3,380,483	3,387,892
Risk margin	1,589	0
Total Technical Provisions	3,382,072	3,387,892

The key differences are:

- The inclusion of the future cash flow in the Index-linked and unit-linked Best Estimate for the SII balance sheet which reduce the insurance liabilities
- The inclusion of the risk margin in the SII balance sheet

### D2.1 Bases, methods and main assumptions used for its valuation of liabilities for solvency purposes

The assumptions and methodology for the best estimate liability and risk margin are set out in the following sections.

#### D2.1.1 Methodology applied in deriving the Technical Provisions

In accordance with Article 77 of the SII Directive 2009/138/EC, the value of Technical Provisions shall be equal to the sum of a best estimate liability (BEL) and a risk margin.

For SLA the BEL is comprised of two elements:

1. The liabilities from the unit-linked policies which match the assets held for the unit-linked contracts
2. The value in force, calculated using the methodology in section D2.1.1.1.

##### D2.1.1.1 Best Estimate of Liabilities valuation methodology

The best estimate liability of the value in force corresponds to the probability-weighted average of future cash-flows, taking account of the time value of money (expected present value of future cash-flows), using the relevant risk-free interest rate.

The calculation of the future cash flows for best estimate is based upon up-to-date and credible information and realistic assumptions and is performed using adequate, applicable and relevant actuarial and statistical methods.

The projection horizon for the cash flows is calculated for each product line based on the age and mortality rates of the policyholders. Therefore, no cash flows are included past this point. The cash flows are then discounted using the PRA risk free rate to give the present value of cash flows for each product group. The present value of cash flows for each product group, are then aggregated to give the total value in force used in the calculation of Best Estimate of Liability.

The projection horizon for the cash flows is calculated using the closure assumption approved by the SLA Board. The closure assumption assumes that the business will cease to operate after 37 years. Therefore, no cash flows are included past this point. The cash flows are then discounted using the PRA risk free rate to give the present value of cash flows for each product group. The present value of cash flows for each product group, are then aggregated to give the total value in force used in the calculation of Best Estimate of Liability.

The best estimate is calculated gross, without deduction of the amounts recoverable from reinsurance contracts. SLA does not use any such reinsurance agreements.

#### **D2.1.1.2 Guarantee and option valuation methodology**

The products that SLA writes are all investment based contracts that do not offer any financial/non-financial guarantees or contractual options. SLA's remuneration is derived from a fixed monetary fee.

#### **D2.1.2 Methodology applied in deriving the risk margin**

The risk margin represents the amount that theoretically would have to be paid to another insurer (in addition to the best estimate of liability) to compensate them for taking on the insurance liabilities. It is based on the principle of allowing for the cost of holding capital to support risks which cannot be readily hedged. These include underwriting risks, credit risk related to reinsurance and special purpose vehicles and operational risk.

##### **D2.1.2.1 Elements included in the SCR for Risk Margin projection**

SLA considers Lapse risk, Expense risk, Counterparty Default Risk and Operational Risk to be non-hedgeable. As such the SCR for these risks is included in the calculation of the risk margin.

##### **D2.1.2.2 Steps in the risk margin calculation**

The risk margin for SLA is calculated using the following steps:

1. Calculate the non-hedgeable risks that are run-off by policies and the non-hedgeable that are not run off by policies.
2. The non-hedgeable risks that are run-off by policies are projected over the projection horizon reducing each year in line with the reduction in policies.
3. The non-hedgeable that are not run off by policies are projected over the protection horizon.
4. The projected non-hedgeable risks that are run-off by policies and the non-hedgeable that are not run off by policies are summed to give a total non-hedgeable SCR

5. 6% cost of capital is applied to the projected non-hedgeable SCR for each year which is then discounted using the risk free rate.
6. The discounted cost of capital is then summed to give the total risk margin.

### **D2.1.2.3 The projection of the SCR**

For the calculation of the risk margin the SCR projected in line with the policy numbers over the cash flow projection horizon for each product group

### D2.1.3 Key assumptions in deriving the Technical Provisions

This section covers key assumptions used to derive the best estimate liability component of the Technical Provisions for SLA. The assumptions used are set out in the following table.

Assumption	31 December 2022	31 December 2021
<b>Lapses</b>		
SIPPs	7.3%	6.9%
Protected Rights	8.1%	10.5%
Private Funds	9.3%	7.2%
Property TIPs	5.7%	5.6%
<b>Average Fee Income per policy</b>		
SIPPs	£1,140	£1,130
Protected Rights	£450	£470
Private Funds	£900	£850
Property TIPs	£460	£440
<b>Expenses</b>		
<b>Total expenditure</b>	<b>£638,266</b>	<b>£576,355</b>
Regulatory Fees	£218,717	£170,751
Long Term Assumption for FSCS	£93,000	£89,000
Licensing and Professional Fees	£326,549	£316,604
<b>Cash Flow Protection Horizon Assumption</b>		
Protected Rights	21 years	22 years
SIPPs	19 years	19 years
Private Funds	25 years	26 years
Property TIPs	25 years	26 years
<b>Economic Assumptions</b>		
Expense Inflation	3.5%	3.5%
Fee inflation	4.5%	4.5%

#### D2.1.3.1 Relevant risk free rate applied in deriving the Technical Provisions

The risk free rate published by PRA is used to calculate the Technical Provisions. As at 31 December 2022 SLA does not utilise volatility adjustments.



### **D2.1.3.2 Lapses**

The lapse assumption is derived based on lapse experience analysis performed for each product group. The policy lapse experience analysis is based on the policy count numbers, i.e. lives basis rather than sum assured. Three years of experience data was used to determine the lapse assumption. The experience data was collected directly from the administration system where each type of lapse is recorded.

The types of policy termination considered in setting the lapse assumption were:

- Transfer to another pension provider including products offered by other members of the Curtis Banks group
- Termination following the payment of a death benefit lump sum
- Termination during cooling off period
- Annuity purchase from another provider on retirement
- Depletion of fund using pension freedoms

### **D2.1.3.3 Expenses**

The following expenses are included in the calculation of Technical Provisions:

#### **External Audit Expenses**

The expense incurred by SLA from the annual external audit of the financial statements and the Solvency II requirements.

#### **Internal Audit Expenses**

SLA's share of the group's cost for the internal audit function performed by Mazars.

#### **Regulatory fees**

The regulatory fees incurred by SLA for operating as a regulated entity comprise fees from both the PRA and FCA. Regulatory fees include the fees and levies from the FCA, PRA, Financial Services Compensation Scheme (FSCS), Money Advice Service (MAS), Financial Ombudsman Service (FOS) and the Pension Guidance Service.

#### **Actuarial Services**

The fees incurred from the outsourcing of the actuarial function.

#### **Licensing fee**

The fee incurred from the use of a data license from the London Stock Exchange.

## **SLP administration fee**

The fee paid to SLP for the provision of administration services. In the cash flow projection this is 90% of annual fee income after the regulatory, external audit, internal audit and actuarial services expenses have been taken into account. This is reduced to 80% of fee income in the modelling of the mass lapse standard formula scenario as per the agreement between SLA and SLP.

The expense assumptions above are increased in line with the expense inflation assumption for each year in the cash flow projection.

### **D2.1.3.4 Mortality and morbidity assumptions**

The pension based products that SLA writes offer the return of funds on the death to a beneficiary, as one option on the death of the policyholder. This option is accounted for in the lapse assumption. There are no other guaranteed death benefits available on the death of the policyholder. In addition to mortality accounted for in the lapse assumption, a projection period for each product line is calculated as the expected number of years to death for the typical policyholder. Beyond the projection period for each product line, cashflows are assumed to be zero.

## **D2.2 Uncertainty associated with the value of Technical Provisions**

Uncertainty in the valuation of technical provisions is most likely to be found in the modelling of the future cash flows which only impacts the value in force. The uncertainty will be driven from the methodology chosen to model the cash flows and the assumptions used in the cash flows. There is also a level of uncertainty in the methodology used for calculating the risk margin where the non-hedgeable SCR is apportioned across the product groups based on the product group's share of the future cash flows.

The uncertainty in assumptions is managed by comparing past assumptions with experience when deriving the assumption for the current reporting period.

## **D2.3 Differences between the bases, methods and main assumptions used for the valuation for solvency purposes and those used for valuation in financial statements**

The differences between the valuation of technical provisions under a Solvency II basis and FRS 101 basis have been outlined in section D2.1 and E1.2.

### D3 Bases, methods and main assumptions used for the valuation for solvency purposes for each material class of other liabilities and the nature of differences with FRS 101 accounting policies

The following table sets out the differences between the SII balance sheet and the financial statements for other liabilities.

(£'000)	SII Basis	Financial Statements
Deferred Tax Liabilities	1,455	0
Deferred Fee Income	0	2,772
Payables	3,732	3,732
Debts owed to credit institutions	0	0
<b>Total other liabilities</b>	<b>5,187</b>	<b>6,504</b>

The key differences are:

- The recognition of deferred tax liability on the SII balance from the tax on the future cash flows
- Deferred fee income of £2,772k, which is not recognised under the Solvency II requirements

The deferred tax liability is included on the SII balance sheet to recognise the amounts of income taxes payable in future periods in respect of taxable temporary differences between Solvency II and FRS 101. The deferred tax liability is calculated by applying the current tax rate to the difference between the Risk Margin and the value in force. The tax rate used at 31 December 2022 was 25% (31 December 2021: 25%).

#### D3.1 Contingent liabilities

As at 31 December 2022 SLA did not hold any contingent liabilities on its balance sheet.

#### D3.2 Provisions, other than Technical Provisions

As at 31 December 2022 SLA did not hold any Provisions on its balance sheet.

### D4 Alternative methods for valuation

For properties held in the unit linked fund which are valued by independent valuers the property value is calculated by dividing the expected rental cash flows by an appropriate rental yield. Future cash flows are calculated based on the valuers' expectation of rental receipts during and after the current tenancy ends. This is typically based on an assessment of rents charged on comparable properties. Property indexation movements are obtained from a third party property index and applied to the last purchase or valuation date. Valuation uncertainty has been assessed as significant for this asset class. There is no comparison performed against historical experience. This valuation method only impacts the value held in the unit linked fund and has no impact on the Solvency position of SLA.

Other than the method of valuing property described no other alternative valuation methods are used by SLA.

## D5 Any other information

No future management actions are used in the calculation of Technical Provisions.

# SECTION E CAPITAL MANAGEMENT

## E1 Own Funds

### E1.1 Management of the Own Funds

The Company is owned by a single shareholder and its shares are fully paid up. It has no debt financing nor does it have any plans to raise debt or issue new shares in the short or medium term.

The Company's Own Funds are primarily invested in cash deposits in bank accounts. There is no intention to change the disposition of own fund items.

The medium-term capital management plan set by the Board is as follows:

- Own funds to be maintained at an acceptable level in excess of the SCR (or MCR where relevant)
- No capital is planned to be issued in the short or medium term
- Own Fund items (other than the value arising from existing policies) are invested in bank deposits in accordance with the Board approved Treasury Policy

SLA has a simple capital structure with all capital items classified as tier 1, with the ability to cancel dividends on ordinary share capital. There are no restrictions on the availability of SLA's own funds to support the SCR or MCR. The Reconciliation Reserve comprises retained profits and valuation differences between SII and FRS 101 of FRS 101 (see section E1.2).

(£'000)	31 December 2022	31 December 2021	Variance
Called up share capital	1	1,700	(1,699)
Deferred Tax	1	1	0
Reconciliation Reserve	7,427	8,269	(842)
<b>SII Basic Own Funds</b>	<b>7,429</b>	<b>9,970</b>	<b>(2,541)</b>

## E1.2 Analysis of change from FRS 101 of FRS 101 equity to Basic Own Funds

The following table sets out the difference between FRS 101 of FRS 101 and Solvency II own funds. These items make up the reconciliation reserve.

(£'000)	31 December 2022
FRS 101 Own Funds	335
<b>Adjustments for FRS 101 components</b>	
Deferred Income	2,771
Accrued Income	(43)
<b>Adjustments SII components</b>	
Risk Margin	(1,589)
Value in force	7,410
Deferred Tax Liability	(1,455)
SII Own Funds	7,429

The key difference between FRS 101 of FRS 101 own funds and Solvency II own funds are:

- The addition of the Risk Margin which is a Solvency II requirement
- The addition of the value in force on the SII balance sheet which reduces Technical Provisions. These are floored to zero on the FRS 101 of FRS 101 balance sheet
- The recognition of deferred tax liability on the SII balance from the tax on the future cash flows
- Deferred and accrued fee income which is not recognised under the Solvency II requirements

## E2 Solvency Capital Requirements and Minimum Capital Requirement

### E2.1 Detail on the capital requirements for SLA

	(£'000)	Standard Formula or Internal Model	31 December 2022	31 December 2021	Variance
Available Own Funds			7,429	9,970	(2,541)
SCR					
Market risk SCR Module		Standard Formula	793	805	(12)
Life underwriting risk SCR Module		Standard Formula	309	641	(332)
Operational risk SCR Module		Standard Formula	2,510	2,294	216
Counterparty default risk SCR Module		Standard Formula	327	328	(1)
Diversification			(379)	(485)	106
Allowance for DTL offset			(890)	(896)	6
Total SCR			2,670	2,687	(17)
SCR Surplus			4,759	7,283	(2,524)
MCR					
MCR			3,445	3,126	319
MCR Surplus			3,984	6,844	(2,860)

There has been an overall decrease of £17k in the SCR from the YE21 position.

### E2.2 Calculation of MCR

Under Solvency II regulations, the Minimum Capital Requirement is calculated as a linear function of a set or sub-set of the following variables:

- the technical provisions
- written premiums
- capital-at-risk
- deferred tax
- Administrative expenses

The variables used shall be measured net of reinsurance. The MCR requirement should not fall below 25% or exceed 45% of the SCR. There is an absolute floor to the MCR of €4,000 (2001: €3,700k) .

SLA is subject to the absolute floor of the MCR which gives an MCR of £3,445k using the £ to € exchange rate for 2022 published by the PRA. The changes to SLA MCR are due to the changes to this exchange rate over the reporting period.

#### **E2.4 Simplifications and parameters used in deriving the Solvency Capital Requirement**

SLA has not adopted any of the simplifications outlined in the SII directive or used any entity specific parameters in calculating the SCR. Proportional modelling simplifications have been used in calculating the SCR and Risk margin considering the nature, scale and complexity of the underlying risks of SLA.

#### **E2.5 Disclosure of capital add-ons to SCR**

SLA is not subject to any capital add-ons.

#### **E3 Duration based equity sub module**

SLA has not adopted the duration based equity sub module.

#### **E4 Differences between Standard Formula and any Internal Model used**

SLA does not use an internal model.

#### **E5 Non-compliance with the MCR and non-compliance with the SCR**

SLA has maintained compliance with both the MCR and SCR during the reporting period.

#### **E6 Any other information**

There is no further material information.



# APPENDIX 1 - QUANTITATIVE REPORTING TEMPLATES

All templates in £'000s

S.02.01.02

Balance sheet

		Solvency II value
		C0010
<b>Assets</b>		
R0030	Intangible assets	
R0040	Deferred tax assets	1
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	0
R0080	<i>Property (other than for own use)</i>	0
R0090	<i>Holdings in related undertakings, including participations</i>	0
R0100	<i>Equities</i>	0
R0110	<i>Equities - listed</i>	
R0120	<i>Equities - unlisted</i>	
R0130	<i>Bonds</i>	0
R0140	<i>Government Bonds</i>	0
R0150	<i>Corporate Bonds</i>	0
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	0
R0180	<i>Collective Investments Undertakings</i>	0
R0190	<i>Derivatives</i>	
R0200	<i>Deposits other than cash equivalents</i>	0
R0210	<i>Other investments</i>	0
R0220	Assets held for index-linked and unit-linked contracts	3,387,892
R0230	Loans and mortgages	0
R0240	<i>Loans on policies</i>	0
R0250	<i>Loans and mortgages to individuals</i>	
R0260	<i>Other loans and mortgages</i>	
R0270	Reinsurance recoverables from:	0
R0280	<i>Non-life and health similar to non-life</i>	0
R0290	<i>Non-life excluding health</i>	
R0300	<i>Health similar to non-life</i>	
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	0
R0320	<i>Health similar to life</i>	0
R0330	<i>Life excluding health and index-linked and unit-linked</i>	0
R0340	<i>Life index-linked and unit-linked</i>	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	
R0370	Reinsurance receivables	
R0380	Receivables (trade, not insurance)	1,919
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	4,876
R0420	Any other assets, not elsewhere shown	
R0500	<b>Total assets</b>	<b>3,394,688</b>

		Solvency II value
		C0010
<b>Liabilities</b>		
R0510	Technical provisions - non-life	0
R0520	<i>Technical provisions - non-life (excluding health)</i>	0
R0530	<i>TP calculated as a whole</i>	
R0540	<i>Best Estimate</i>	
R0550	<i>Risk margin</i>	
R0560	<i>Technical provisions - health (similar to non-life)</i>	0
R0570	<i>TP calculated as a whole</i>	
R0580	<i>Best Estimate</i>	
R0590	<i>Risk margin</i>	
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	<i>Technical provisions - health (similar to life)</i>	0
R0620	<i>TP calculated as a whole</i>	0
R0630	<i>Best Estimate</i>	0
R0640	<i>Risk margin</i>	0
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	0
R0660	<i>TP calculated as a whole</i>	0
R0670	<i>Best Estimate</i>	0
R0680	<i>Risk margin</i>	0
R0690	Technical provisions - index-linked and unit-linked	3,382,071
R0700	<i>TP calculated as a whole</i>	3,387,892
R0710	<i>Best Estimate</i>	-7,410
R0720	<i>Risk margin</i>	1,589
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	1,455
R0790	Derivatives	
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	
R0830	Reinsurance payables	
R0840	Payables (trade, not insurance)	3,732
R0850	Subordinated liabilities	0
R0860	<i>Subordinated liabilities not in BOF</i>	
R0870	<i>Subordinated liabilities in BOF</i>	0
R0880	Any other liabilities, not elsewhere shown	
R0900	<b>Total liabilities</b>	3,387,258
R1000	<b>Excess of assets over liabilities</b>	7,429

S.05.01.02

Premiums, claims and expenses by line of business

Life

	Line of Business for: life insurance obligations						Life reinsurance obligations			Total
	Health insurance C0210	Insurance with profit participation C0220	Index-linked and unit-linked insurance C0230	Other life insurance C0240	Annuities stemming from non-life insurance contracts relating to health insurance obligations C0250	Annuities stemming from non-life insurance contracts relating to insurance obligations other than health insurance C0260	Health reinsurance C0270	Life reinsurance C0280	C0300	
<b>Premiums written</b>										
R1410 Gross			202,055						202,055	
R1420 Reinsurers' share									0	
R1500 Net			202,055						202,055	
<b>Premiums earned</b>										
R1510 Gross									0	
R1520 Reinsurers' share									0	
R1600 Net			0						0	
<b>Claims incurred</b>										
R1610 Gross			327,843						327,843	
R1620 Reinsurers' share									0	
R1700 Net			327,843						327,843	
<b>Changes in other technical provisions</b>										
R1710 Gross									0	
R1720 Reinsurers' share									0	
R1800 Net			0						0	
R1900 <b>Expenses incurred</b>			44,424						44,424	
R2500 <b>Other expenses</b>										
R2600 <b>Total expenses</b>									44,424	

S.05.02.01

Premiums, claims and expenses by country

Life

	C0150			C0160			C0170			C0180			C0190			C0200			C0210		
	Home Country			Top 5 countries (by amount of gross premiums written) - life obligations			Top 5 countries (by amount of gross premiums written) - life obligations			Top 5 countries (by amount of gross premiums written) - life obligations			Top 5 countries (by amount of gross premiums written) - life obligations			Total Top 5 and home country					
	C0220	C0230	C0240	C0250	C0260	C0270	C0280														
<b>Premiums written</b>																					
R1410 Gross	202,055																			202,055	
R1420 Reinsurers' share																				0	
R1500 Net	202,055																			202,055	
<b>Premiums earned</b>																					
R1510 Gross																				0	
R1520 Reinsurers' share																				0	
R1600 Net	0																			0	
<b>Claims incurred</b>																					
R1610 Gross	327,843																			327,843	
R1620 Reinsurers' share																				0	
R1700 Net	327,843																			327,843	
<b>Changes in other technical provisions</b>																					
R1710 Gross																				0	
R1720 Reinsurers' share																				0	
R1800 Net	0																			0	
<b>Expenses incurred</b>																					
R1900	44,424																			44,424	
R2500 Other expenses																					
R2600 Total expenses																				44,424	



5.23.01.01  
Own Funds

Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35

	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
R0010 Ordinary share capital (gross of own shares)	1	1	0	0	0
R0030 Share premium account related to ordinary share capital	0	0	0	0	0
R0040 Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0	0	0	0
R0050 Subordinated mutual member accounts	0	0	0	0	0
R0070 Surplus funds	0	0	0	0	0
R0090 Preference shares	0	0	0	0	0
R0110 Share premium account related to preference shares	0	0	0	0	0
R0130 Reconciliation reserve	7,427	7,427	0	0	0
R0140 Subordinated liabilities	0	0	0	0	0
R0160 An amount equal to the value of net deferred tax assets	1	0	0	0	1
R0180 Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
<b>R0220 Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds</b>	0	0	0	0	0
<b>R0230 Deductions for participations in financial and credit institutions</b>	0	0	0	0	0
<b>R0290 Total basic own funds after deductions</b>	7,429	7,428	0	0	1
<b>Ancillary own funds</b>					
R0300 Unpaid and uncalled ordinary share capital callable on demand	0	0	0	0	0
R0310 Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0	0	0	0	0
R0320 Unpaid and uncalled preference shares callable on demand	0	0	0	0	0
R0330 A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0	0	0	0	0
R0340 Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0	0	0	0	0
R0350 Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0	0	0	0	0
R0360 Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0	0	0	0	0
R0370 Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0	0	0	0	0
R0390 Other ancillary own funds	0	0	0	0	0
<b>R0400 Total ancillary own funds</b>	0	0	0	0	0
<b>Available and eligible own funds</b>					
R0500 Total available own funds to meet the SCR	7,429	7,428	0	0	1
R0510 Total available own funds to meet the MCR	7,428	7,428	0	0	0
R0540 Total eligible own funds to meet the SCR	7,429	7,428	0	0	1
R0550 Total eligible own funds to meet the MCR	7,428	7,428	0	0	0
R0580 SCR	2,670				
R0600 MCR	3,445				
R0620 Ratio of Eligible own funds to SCR	278.26%				
R0640 Ratio of Eligible own funds to MCR	233.11%				
<b>Reconciliation reserve</b>	C0060				
R0700 Excess of assets over liabilities	7,429				
R0710 Own shares (held directly and indirectly)	0				
R0720 Foreseeable dividends, distributions and charges	0				
R0730 Other basic own fund items	2				
R0740 Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0				
<b>R0760 Reconciliation reserve</b>	7,427				
<b>Expected profits</b>					
R0770 Expected profits included in future premiums (EPIFP) - Life business					
R0780 Expected profits included in future premiums (EPIFP) - Non-life business					
<b>R0790 Total Expected profits included in future premiums (EPIFP)</b>	0				

## Solvency Capital Requirement - for undertakings on Standard Formula

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
R0010 Market risk	793		9
R0020 Counterparty default risk	327		
R0030 Life underwriting risk	280	9	9
R0040 Health underwriting risk	0	9	9
R0050 Non-life underwriting risk	0	9	9
R0060 Diversification	-351		
R0070 Intangible asset risk	0		
R0100 <b>Basic Solvency Capital Requirement</b>	1,050		
<b>Calculation of Solvency Capital Requirement</b>			
R0130 Operational risk	2,510		
R0140 Loss-absorbing capacity of technical provisions	0		
R0150 Loss-absorbing capacity of deferred taxes	-890		
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200 <b>Solvency Capital Requirement excluding capital add-on</b>	2,670		
R0210 Capital add-ons already set	0		
R0220 <b>Solvency capital requirement</b>	2,670		
<b>Other information on SCR</b>			
R0400 Capital requirement for duration-based equity risk sub-module	0		
R0410 Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420 Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430 Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440 Diversification effects due to RFF nSCR aggregation for article 304	0		
<b>Approach to tax rate</b>			
R0590 Approach based on average tax rate	Yes		
<b>Calculation of loss absorbing capacity of deferred taxes</b>			
<b>LAC DT</b>			
<b>C0130</b>			
R0640 LAC DT	-890		
R0650 LAC DT justified by reversion of deferred tax liabilities	0		
R0660 LAC DT justified by reference to probable future taxable economic profit	-890		
R0670 LAC DT justified by carry back, current year	0		
R0680 LAC DT justified by carry back, future years	0		
R0690 Maximum LAC DT	0		

## USP Key

## For life underwriting risk:

- 1 - Increase in the amount of annuity benefits
- 9 - None

## For health underwriting risk:

- 1 - Increase in the amount of annuity benefits
- 2 - Standard deviation for NSLT health premium risk
- 3 - Standard deviation for NSLT health gross premium risk
- 4 - Adjustment factor for non-proportional reinsurance
- 5 - Standard deviation for NSLT health reserve risk
- 9 - None

## For non-life underwriting risk:

- 4 - Adjustment factor for non-proportional reinsurance
- 6 - Standard deviation for non-life premium risk
- 7 - Standard deviation for non-life gross premium risk
- 8 - Standard deviation for non-life reserve risk
- 9 - None





Curtis Banks            T 0370 414 7000  
153 Princes Street,    F 0370 414 8000  
Ipswich, IP1 1QJ        [curtisbanks.co.uk](http://curtisbanks.co.uk)

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