

YEAR
ANNIVERSARY **10**

2020 ASIA-PACIFIC VIRTUAL SYMPOSIUM

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Session 14 – Transitioning to IFRS 17

29 September 2020



SOCIETY OF ACTUARIES

Antitrust Compliance Guidelines

Active participation in the Society of Actuaries is an important aspect of membership. While the positive contributions of professional societies and associations are well-recognized and encouraged, association activities are vulnerable to close antitrust scrutiny. By their very nature, associations bring together industry competitors and other market participants.

The United States antitrust laws aim to protect consumers by preserving the free economy and prohibiting anti-competitive business practices; they promote competition. There are both state and federal antitrust laws, although state antitrust laws closely follow federal law. The Sherman Act, is the primary U.S. antitrust law pertaining to association activities. The Sherman Act prohibits every contract, combination or conspiracy that places an unreasonable restraint on trade. There are, however, some activities that are illegal under all circumstances, such as price fixing, market allocation and collusive bidding.

There is no safe harbor under the antitrust law for professional association activities. Therefore, association meeting participants should refrain from discussing any activity that could potentially be construed as having an anti-competitive effect. Discussions relating to product or service pricing, market allocations, membership restrictions, product standardization or other conditions on trade could arguably be perceived as a restraint on trade and may expose the SOA and its members to antitrust enforcement procedures.

While participating in all SOA in person meetings, webinars, teleconferences or side discussions, you should avoid discussing competitively sensitive information with competitors and follow these guidelines:

- **Do not** discuss prices for services or products or anything else that might affect prices
- **Do not** discuss what you or other entities plan to do in a particular geographic or product markets or with particular customers.
- **Do not** speak on behalf of the SOA or any of its committees unless specifically authorized to do so.
- **Do** leave a meeting where any anticompetitive pricing or market allocation discussion occurs.
- **Do** alert SOA staff and/or legal counsel to any concerning discussions
- **Do** consult with legal counsel before raising any matter or making a statement that may involve competitively sensitive information.

Adherence to these guidelines involves not only avoidance of antitrust violations, but avoidance of behavior which might be so construed. These guidelines only provide an overview of prohibited activities. SOA legal counsel reviews meeting agenda and materials as deemed appropriate and any discussion that departs from the formal agenda should be scrutinized carefully. Antitrust compliance is everyone's responsibility; however, please seek legal counsel if you have any questions or concerns.

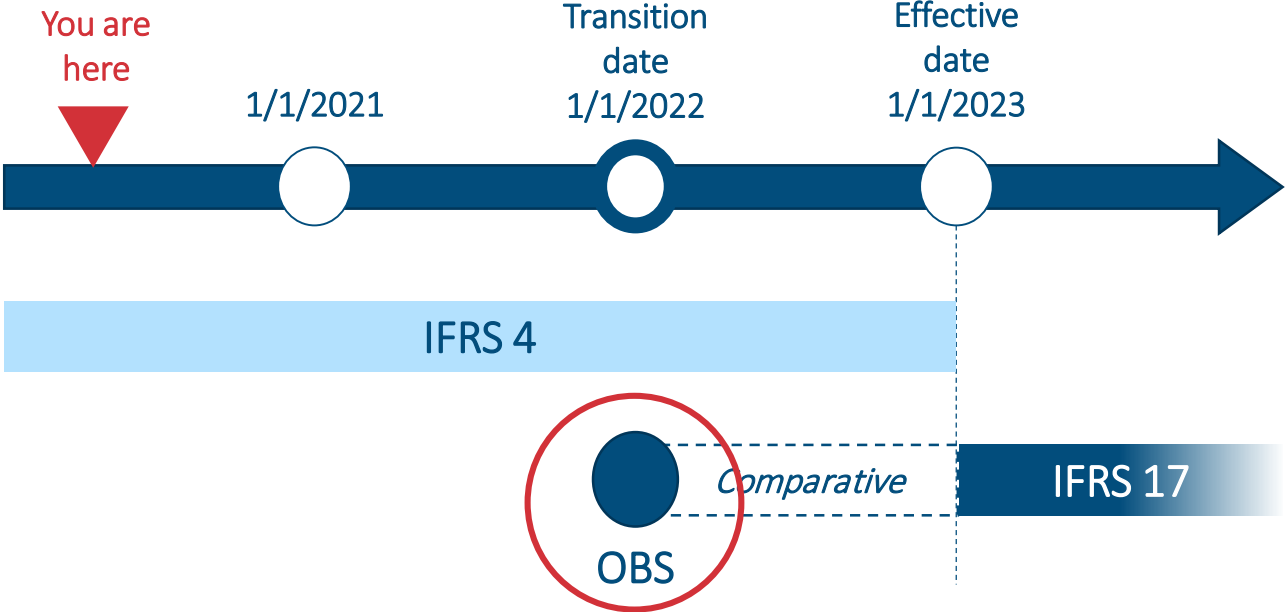
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Introduction



Transitioning to IFRS 17 – Timeline



Transitioning to IFRS 17 – OBS

Assets		Liabilities	Equity
① Intangible assets	Financial assets	Insurance contract liabilities (LRC) <ul style="list-style-type: none"> • PVCF (BEL) • Risk adjustment • CSM / Loss component 	Retained earnings
② Deferred acquisition costs			Accumulated OCI <ul style="list-style-type: none"> • Financial assets AOCI • Insurance contracts AOCI
③ Assets for acquisition cash flows		Insurance contract liabilities (LIC)	
Deferred tax assets		Deferred tax liabilities	
Other assets		Other liabilities	



Relevant to transition approaches

① Unchanged

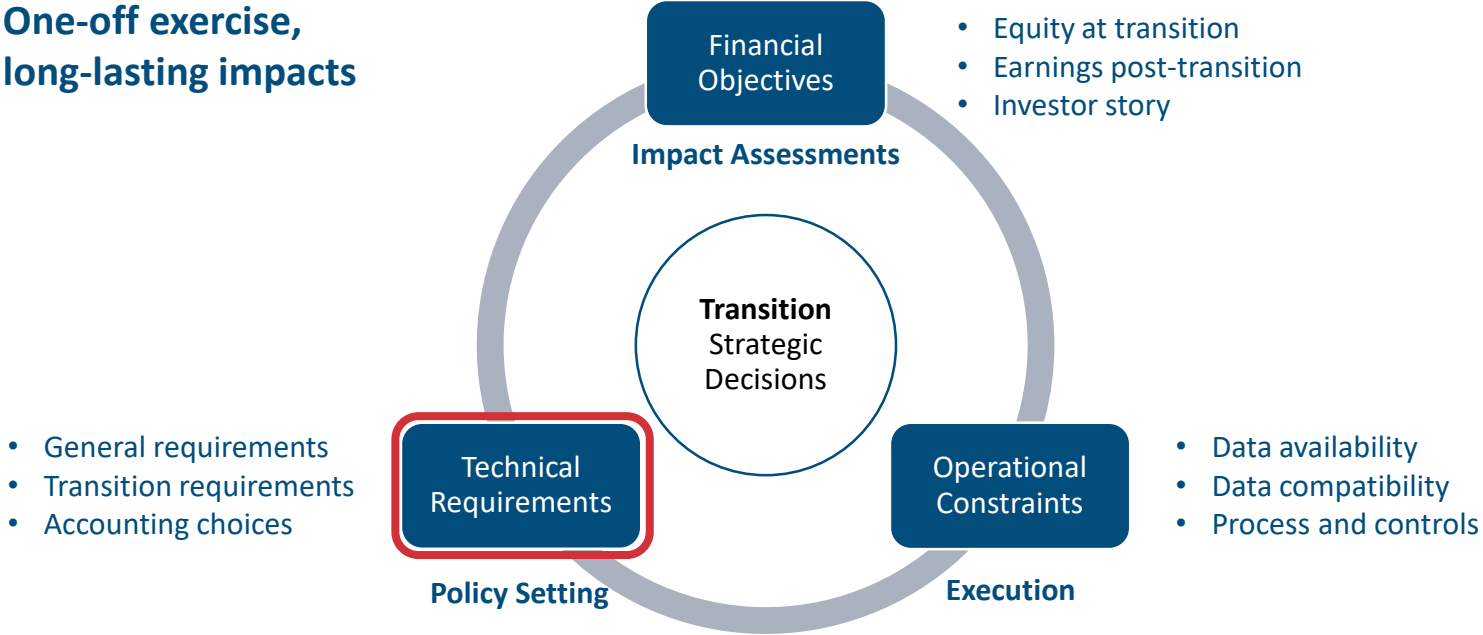
③ New

② Removed

④ Replaced

Transitioning to IFRS 17 – Strategic View

**One-off exercise,
long-lasting impacts**

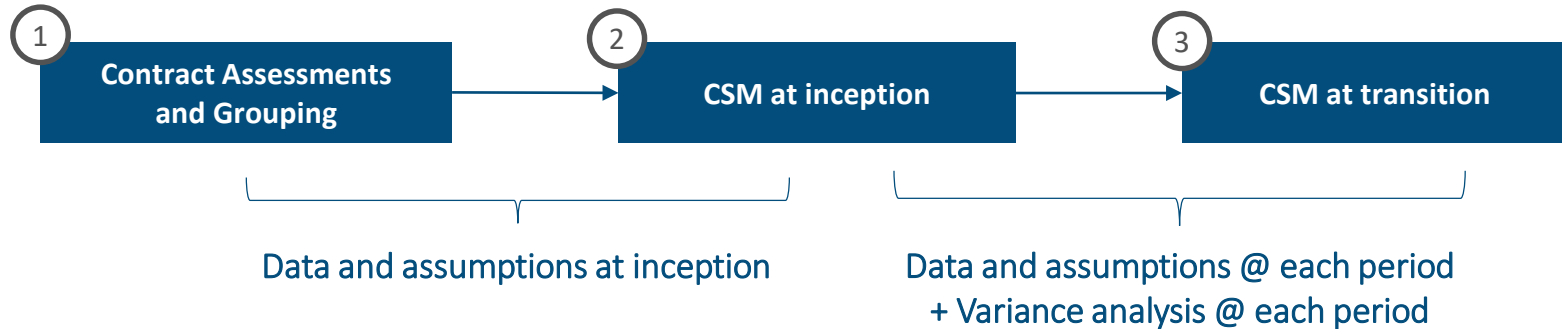


Transition Approaches

FRA, MRA, FVA

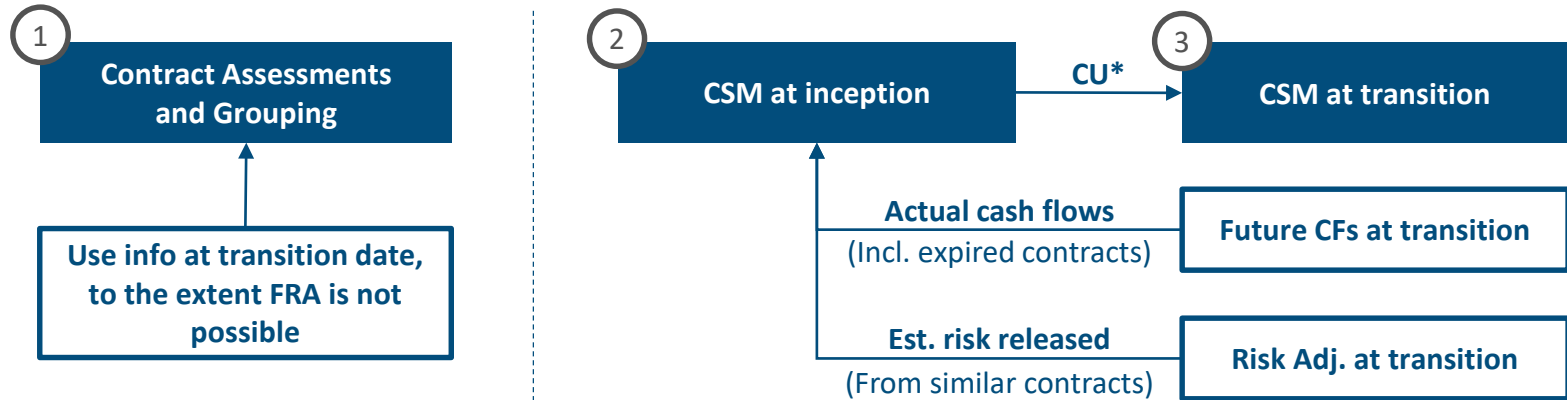


Transition Approaches – Full Retrospective Approach



- Historical data compatible with new systems?
- Historical data available at required granularity?
- Assumptions that did not exist pre-IFRS 17?
- Costly to set up and run results for historical periods?

Transition Approaches – Modified Retrospective Approach



- Historical cash flows by cohort available? Are estimates allowed?
- Historical attributable expenses (IFRS 17 basis) available?
- What are “similar contracts”?
- Historical coverage units available?

* Coverage units

Transition Approaches – Fair Value Approach



** IFRS 13: fair value = the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date (exit value)*

- Unit of account
- Contract boundary
- Exclusion of NB

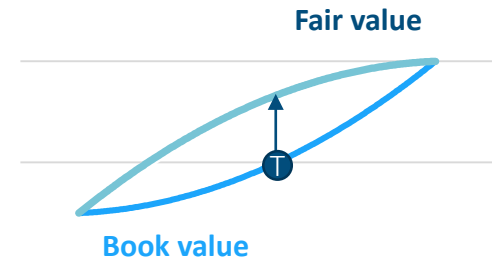
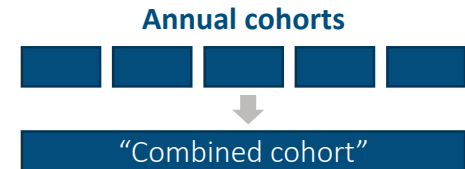
- Information at transition date = Assessment as of transition date?
- Fair value determination – Are past transactions relevant? What’s the context under transition?
- Fair value technique – Direct approach or indirect approach? How to estimate parameters?
- Fair value for reinsurance contracts held – What are we measuring? Is net approach allowed?

Transition Approaches – Fair Value Approach

Additional considerations over the MRA:

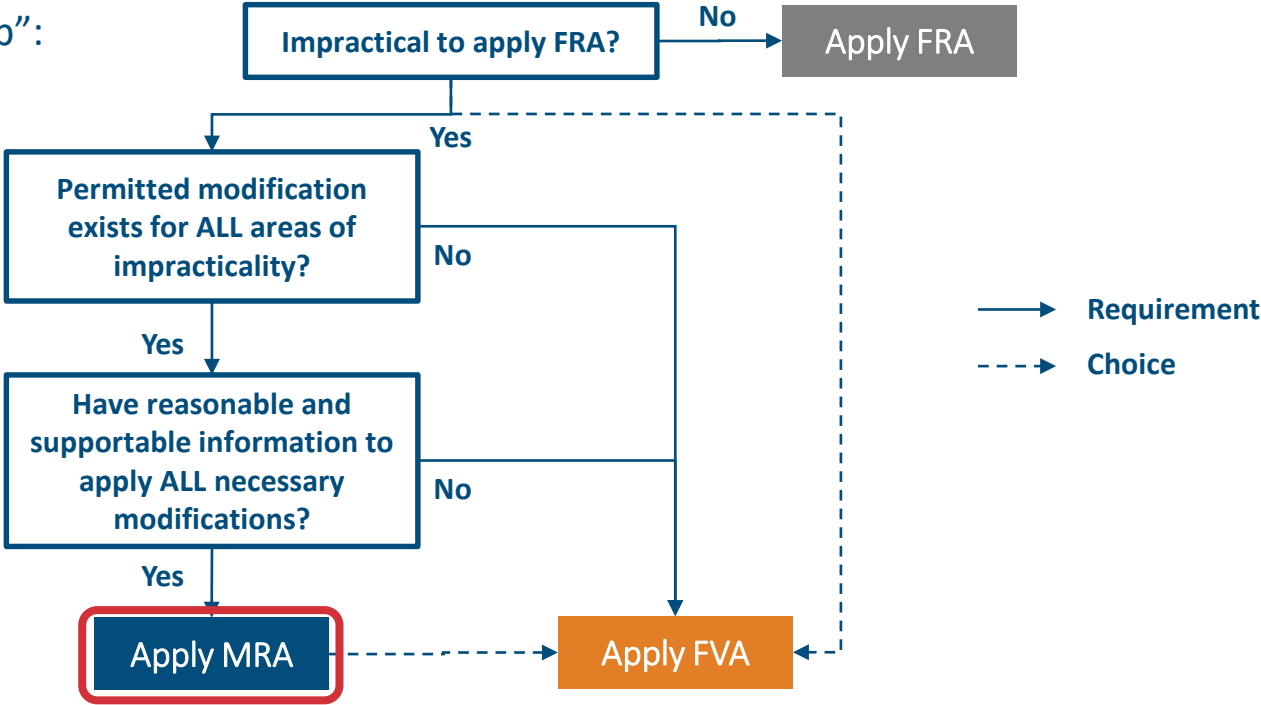
1. Separation into annual cohorts is not required
 - Reduced chance of loss recognition post-transition
2. Locked-in discount rates can be reset at transition date
 - No historical discount rates and economic scenarios required
 - Affects post-transition P&L from CSM interest accretion and CSM unlocking
3. Accumulated OCI can be set to zero*
 - Pre-transition interest rate volatility absorbed in retained earnings
 - Effectively, book value reset to equal to fair value at transition
 - Affects post-transition P&L with a different “liability interest unwind”

* Applicable if OCI option is chosen (except for some VFA contracts)



Transition Approaches – Eligibility

For each “CSM Group”:



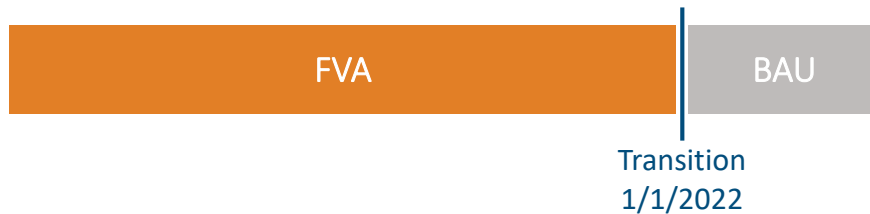
Transition Approaches – Industry Perception



- Maximize use of FRA/MRA
- Loosely interpret FRA/MRA
- More use of estimates (e.g. based on existing reporting information)

Transition Approaches – Application

Ideal outcome:



Expected outcome:



- FVA is the simplest operationally
- Additional flexibility of FVA over MRA (e.g. combined cohort relief)
- FRA needs to be proven to be impractical
- FRA for most recent cohorts may be inevitable
- FVA for older businesses with limited data
- Limited cohorts with a choice between MRA and FVA to allow for financial flexibility

Illustrative Example



Illustrative Example – Fact Pattern

- **Company A and Company B have identical assets and insurance contract portfolios at transition date:**
 - Asset value = 1,000 (cash)
 - Best-estimate liability = 500
 - Duration of contracts = 3 years, total expected duration = 10 years
 - Single premium of 1,000
 - Claims and expenses = 70% of premium → Profit margin = **30%** of premium
 - Interest rate = 5% (stayed constant since inception)
 - No experience variance since inception
 - CSM is amortized on a straight line basis (assume decrement is negligible)
 - OCI option is adopted
- **The only difference between the companies is the accounting for transition under IFRS 17:**
 - Company A: Modified retrospective approach
 - Company B: Fair value approach + choose to reset locked-in rates and AOCI

Illustrative Example – Base Case

Company A - MRA

	0	3	4	5	6	7	8	9	10
Assets			1000							
Liabilities										
BEL										
CSM				180	158	132	104	73	38	0
P&L (partial)										
CSM Release				30	32	33	35	36	38	40
CSM Accretion				-10	-9	-8	-7	-5	-4	-2
Total				20	23	25	28	31	35	38
Equity			300	320	343	368	396	427	462	500
Retained earnings			300	320	343	368	396	427	462	500
OCI			0	0	0	0	0	0	0	0

Transition

30% of premium

Locked-in rate = 5%

Company B - FVA

	3	4	5	6	7	8	9	10		
Assets	1000									
Liabilities										
BEL										
CSM				44	38	31	24	17	9	0
P&L (partial)										
CSM Release				7	8	8	8	8	9	9
CSM Accretion				-2	-1	-1	-1	-1	0	0
Total				6	6	7	7	8	8	9
Equity	450	456	462	469	476	483	491	500		
Retained earnings	450	456	462	469	476	483	491	500		
OCI	0	0	0	0	0	0	0	0		

Transition

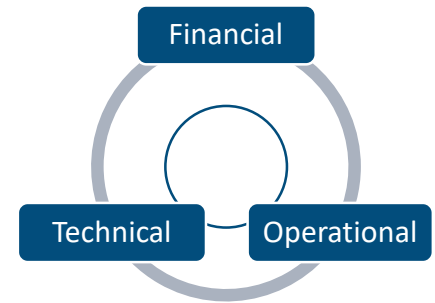
Est. fair value margin = 10% of BEL

Transition Planning



Transition Planning

- Define your **strategic goals**
 - Equity vs. earnings
 - Investor story
- Perform high-level **financial impact assessments (FIA)**
 - How big is the gap?
 - Where are the effective “gap-fillers”?
 - Understanding the limitations of FIAs
 - Regular updates are essential
- Perform high-level **operational assessments**
 - Where are the major deal breakers?



Which parts of the business will have a significant financial advantage in applying the MRA over the FVA?



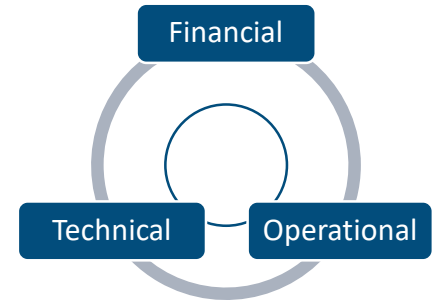
Which is the point in time that any business written before that have no choice but to apply the FVA?

Transition Planning

- **Strategically prioritize** certain blocks for further analyses
 - Which product types?
 - How many cohorts?
- Make timely strategic decisions
 - Strategic goals
 - Accounting choices (e.g. MRA vs. FVA)
 - Level of technical risks retained
 - Level of flexibility retained
- Engage with the **auditor** at an appropriate time
- Execution, external communications, etc.



Which products and which cohorts do you really have a choice between MRA and FVA?





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