

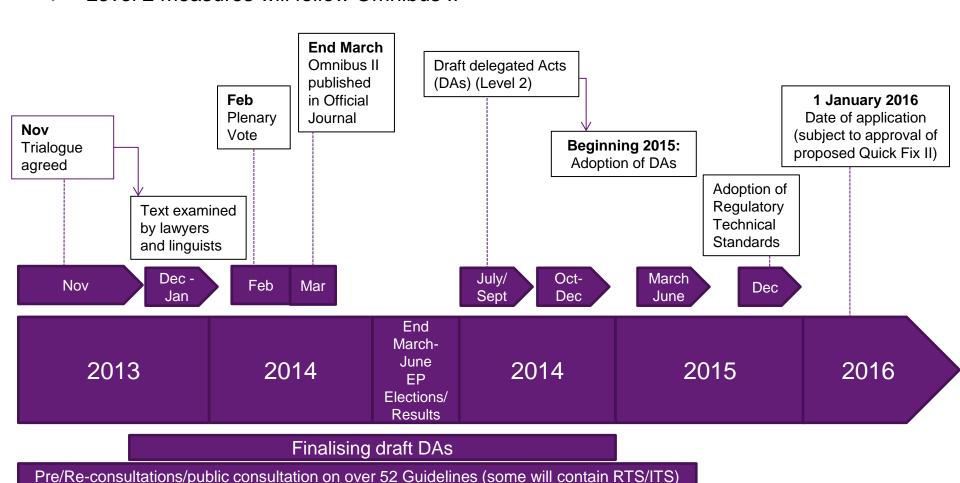
RISK ASSURANCE & 2014 PLANNING WORKSHOPS 11 & 12 DECEMBER 2013

AGENDA

- **▶** Introduction
- ► Solvency II update
 - Lloyd's approach
 - Review of October Board attestations
 - Lloyd's approach in 2014 and beyond
- **▶** Minimum Standards update
- **▶** Standards Assessments
- **▶** 2014 Guidance & timetable
- Next steps

SOLVENCY II TIMETABLE BECOMES MORE CERTAIN...

- ► EU to formally postpone implementation date to 1 January 2016
- Political agreement reached on Omnibus II
- Level 2 measures will follow Omnibus II



LLOYD'S STILL ON TRACK FOR SUCCESSFUL IMPLEMENTATION OF SOLVENCY II

- ▶ Lloyd's planning has assumed 1 January 2016 start date since 2012
- ▶ 2014 will be third year of capital setting using Solvency II models (for 2015 yoa)
- Improved risk governance structure well established now
- Pillar 3 requirements being introduced progressively
- Market 'soft landing' in line with EIOPA and PRA approach

...AND INTERIM STEPS BECOME CLEARER...

- ► EIOPA Guidelines (Interim Measures) finalised September 2013
 - Phased introduction of Pillar 2 measures consistent with Lloyd's current approach
 - Pillar 3 requirements to apply from 31 December 2014

- PRA has issued draft Supervisory Statement to UK firms with respect to compliance with the Guidelines
 - Expectations for UK firms
 - Lloyd's represented on PRA Industry Pillar 3 implementation group

► PRA ICAS+ regime consistent with Lloyd's approach

...WITH NO MATERIAL CHANGE FOR LLOYD'S DUE TO "SOFT LANDING"

RISK ASSURANCE HIGH LEVEL UPDATE

- Significant progress towards refreshing the current minimum standards has been made, however the 1 January 2014 launch date was aspirational
- The standards timetable has now been adjusted:
 - Full consultation on all standards will complete by the end of Q1 2014
 - Q2 2014 used for Executive Team and Franchise Board sign off and consistency review
 - Standards will be launched 1 July 2014
- Work on-going to revise the web based presentation of the standards
 - Improved structure and clarity over current standards section
- Continued progress on Lloyd's Standards Framework update
- Senior Nominated Person (SNP) role extended to include responsibility for compliance with Lloyd's standards
 - Workshops will be run in Q1 2014 to explain the new approach

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"SOFT LANDING" APPROACH APPLIED FROM 2013

- Quantitative requirements applied immediately to support use of Solvency II models.
 Hard Test submissions treated as BAU and should comply with all relevant requirements.
- Qualitative requirements phased in over 2013 to 2015. Soft Test submissions should be made on a best efforts basis.

| Quantitative – hard test | Qualitative – soft test |
|---------------------------------|---------------------------|
| SCR | ORSA |
| TPD Return* | Actuarial Function Report |
| GQD Return** | Model Change Report |
| Solvency II Balance Sheet (QMC) | Validation Report |
| LIM Asset Return (QAD) | |

^{*} Technical Provisions Data: by risk code and year of account

^{**} Gross Quarterly Data: by risk code and year of account

GOOD PROGRESS ON MEETING THE PRINCIPLES DURING 2013

COMMON ISSUES DRIVING "FAILS" ON PRINCIPLES OF SOLVENCY II

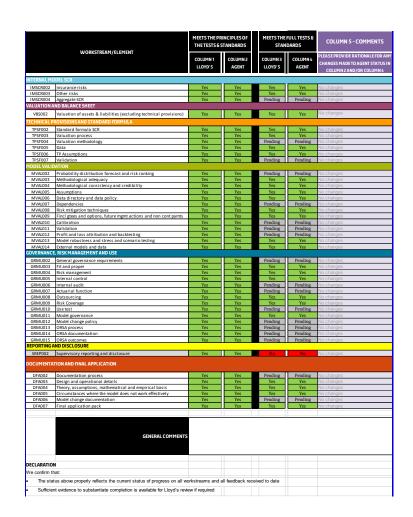
| January 2013 | October 2013 | |
|---------------|--------------|--|
| ORSA | ORSA | |
| Validation | Validation | |
| Use Test | Use Test | |
| Documentation | | |

Whilst the themes are broadly similar, we have seen improvements over the year in the number of agents having issues in these areas



AGENT ASSESSMENTS INFORMED BY BOARD CONFIRMATION OF SOLVENCY II STATUS

- Agent submissions made 25 October
- Lloyd's expectations of Board members:
 - Understanding of where gaps are and what is required to close them
 - Understanding of where Lloyd's view and agents view differs
- Lloyd's (SAG) is reviewing each agent's rating by end 2013 based on these submissions
- Verbal feedback during Nov/ Dec with formal letter to follow in 2014:
 - Confirmation of agent ratings against Principles and also Lloyd's view on progress against full tests and standards



MEASUREMENT AGAINST PRINCIPLES WILL NO LONGER BE USED IN 2014

- Principles of Solvency II tests and standards introduced in 2013 to allow for delay to the SII timetable
- ► Final <u>Guidelines</u> (interim measures) published September 2013
- Increased certainty that <u>Full</u> Solvency II tests and standards will apply from January 2016
- ▶ But measurement against Principles is no longer appropriate and will not be used in 2014.
- ► Focus on Guidelines and Full Solvency II tests and standards in 2014 and 2015

GUIDELINES - IMPACT ON AGENTS

- Mapping of Guidelines to Lloyd's SII programme being done in December 2013
 - No additional requirements on managing agents
 - Lloyd's needs to ensure that we are able to demonstrate to the PRA that managing agents are meeting the Guidelines
 - Lloyd's will expect more explicit evidence in some areas, including
 - Technical risk management areas (guidelines 15 24 of Systems of Governance),
 - Capital management policy (guideline 31 of Systems of Governance)
 - Medium Term Capital Management Plan (guideline 32 of Systems of Governance)
- Account managers will discuss with agents on a case by case basis in early 2014 to agree what further evidence and/ or review will be required

WHERE IS THE MARKET IN TERMS OF PROGRESS AGAINST THE FULL SOLVENCY II TESTS & STANDARDS....?

FULL SII TESTS & STANDARDS - IMPACT ON AGENTS

- Renewed focus on Full Solvency II Tests and Standards during 2014 and beyond
 - Increased interaction with Lloyd's and the PRA
 - Lloyd's IMAP submission expected to be made in 2015
 - Managing agents will be expected to be demonstrably meeting full tests and standards by <u>end 2014</u>
 - Agents and Lloyd's should be clear on what remains to be resolved before full tests and standards can be met
 - Regular monthly meetings with Account Managers will recommence, and Account
 Managers will be in touch early in the New Year to discuss individually with agents

ALL AGENT RATINGS WILL BE REVISITED IN Q1 2014 TO ASSESS PROGRESS AGAINST THE FULL TESTS AND STANDARDS

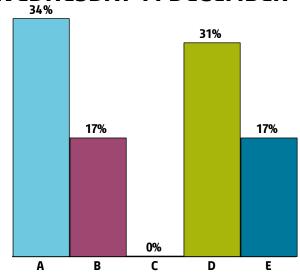
TABLE DISCUSSION

- ▶ What are the key areas of SII work for your agent in 2014?
- ▶ What kind of resource challenges will you be facing, and how will you resolve these?
 - SII project office?
 - Recruitment?
 - Contractors?
 - Existing staff?
- ▶ What do you see as the key challenges for 2014?

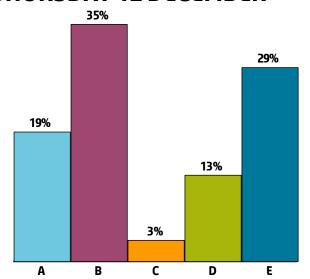
WHERE ARE THE KEY AREAS OF SOLVENCY II WORK FOR YOUR AGENT IN 2014?

- A. ORSA
- B. Model Change
- C. Calculation Kernel
- D. Validation
- E. Use Test

WEDNESDAY 11 DECEMBER



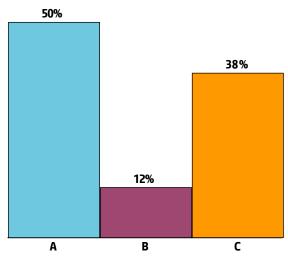
THURSDAY 12 DECEMBER



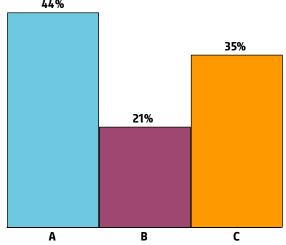
DO YOU HAVE THE RIGHT LEVEL OF SOLVENCY II RESOURCES FOR 2014?

- A. Yes, we are adequately resourced
- B. No, we will need to make some changes
- C. Not sure yet

WEDNESDAY 11 DECEMBER



THURSDAY 12 DECEMBER



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WHY ARE WE REFRESHING THE STANDARDS?

- One set of standards covering all requirements for Managing Agents
 - A clear framework within which all Managing Agents are expected to operate
 - Consistency in interpretation, presentation and publication
 - Alignment to new Solvency II and PRA requirements

CURRENT STANDARDS

Claims Management
Risk Management
Underwriting Management
Effective operational processes
Governance
Management of investment risk

Reputation & Brand



REVISED STANDARDS

Governance

Internal Model

Underwriting

Reinsurance

Delegated Authorities

Exposure Management

Risk Management

Investment Management

Claims Management

Ethics & Compliance



SOLVENCY II

GOVERNANCE STANDARD EXAMPLE

GROUPING

HIGH LEVEL SUBJECT
AREA

System of Governance

SUBJECT

BRIEF DESCRIPTION OF THE SUBJECT OF THE REQUIREMENT

Effective System of Governance

STANDARD

Managing Agents shall have in place an effective system of governance which provides for sound and prudent management of the business.

REQUIREMENT

The system of governance shall:

- -be proportionate to the nature, scale and complexity of the operations of the business
- -provide for effective cooperation, internal reporting and communication of information at all relevant levels of the business -include compliance with the requirements laid down in the SII
- Framework directive, Articles 42 to 49

STRUCTURE OF NEW STANDARDS

| LEVEL | PURPOSE | EXAMPLE |
|-------------------------|---|--|
| Group | Groups of standards, generally aligned to Lloyd's technical review teams | Governance |
| Standard | A brief statement of capability or level of conduct required. It is envisaged that these standards will not change significantly over time. | "Managing agents shall have an effective risk management function" |
| Requirement | A sub-set of requirements that specifies key areas that must be addressed in meeting the standard. Lloyds will seek positive assurance that each requirements has been met. Envisaged that requirements will evolve over time without the over-riding standard changing. | "The tasks of the risk management function shall include: monitoring the risk management system" |
| Guidance | Explanation of how Lloyds will assess whether standards have been met. Aimed primarily at compliance & project managers. It is envisaged that this document may change over time in line with changes in requirements. | Governance Standards Guidance |
| Implementation Guidance | Practical advice and examples showing how agents can address selected problems. Not primarily aimed at helping to meet Lloyd's standards, but it is consistent with them. Aimed at the relevant subject matter expert. It is expected that this guidance will continue to develop as practises & tools evolve. | Model Change Report Guidance (March 2013) |

UPDATE - STANDARDS PROGRESS

| Standard | Standard ready for consultation | Guidance ready for consultation | Sub-Group agreed | Sub-Group review complete | RAC review completed | Issued to market | Market review complete | Consistency review complete | Governance review complete | Published on Lloyds.com |
|-----------------------------------|---------------------------------------|---------------------------------------|---------------------|---------------------------------|-------------------------|---------------------|------------------------------|-----------------------------------|----------------------------------|-------------------------------|
| Governance | ✓ | • | ✓ | ✓ | | ~ | ~ | | | |
| Internal Model (Actuarial) | | | | | | | | | | |
| Internal Model (Non Actuarial) | ⊘ | ✓ | ✓ | | | | | | | |
| Underwriting | | | | | | | | | | |
| Reinsurance | ✓ | | ~ | | | | | | | |
| Delegated Authority | | | ⊘ | | | | | | | |
| Exposure Management | ~ | | V | | | | | | | |
| Risk Management | ⊘ | ② | ② | ② | ② | ② | | | | |
| Investment Management | • | | • | | | | | | | |
| Claims Management | ② | ② | ⊘ | ⊘ | | | | | | |
| Brand & Reputation | | | • | | | | | | | |

NEXT STEPS

- ► All work completed by end Q1 2014
- Alignment of the Q1 Market consultation
- ► Factored in additional approval requirements within Lloyd's prior to release to the sub-groups
- Limited contingency in a number of plans to hit the Q1 deadline

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STANDARDS ASSESSMENT

- Existing standards will continue to be owned by their functional teams
- New standards groups are being created to address SII requirements e.g. qualitative and quantitative internal model
- Project initiated to map each individual standard to BAU assessment activities
- ► Early discussions suggest that BAU review activity falls into 3 main categories:
 - Agent Self-Assessment returns
 - Review of BAU qualitative and quantitative returns e.g. SCR reviews
 - Reviews undertaken where the primary purpose is to assess whether an Agent meets the standards (Effectiveness Reviews)

MARKET FEEDBACK THEMES – EXPERIENCE OF EXTERNAL REVIEWS

BENEFITS

- Focuses Management/Board attention (9 of the 12 tables)
- Benchmarking against peers (8)
- Sharing best practice (8)
- ✓ Independent review /Board Assurance (7)
- Fresh pair of eyes (6)
- Raises priority of documentation (2)

VALUE DETRACTORS

The Reviewer

- Lack of knowledge about Agent (5)
- Lack of experience of reviewer (7)
- Reviewer style (2)

The Review Process

- ★More notice of schedule (4)
- **x**Cost v benefit, consider how to use minimal resources (4)

Feedback

- ★Timeliness (2)
- *Lack of constructive feedback or clarity on what is required (4)

NEW GUIDELINES CREATED TO EXPLAIN LLOYD'S CRITERIA FOR A ROBUST STANDARDS REVIEW

- 2 new sets of guidelines created by Working Group
 - Self-Assessment
 - Effectiveness Reviews
- Brings together best practice from across Lloyd's
- Prescriptive in certain aspects to
 - ensure reviewers are clear about what Lloyd's considers robust
 - provide management information for oversight groups
 - promote a consistent approach, look and feel for Agents
- Allows teams flexibility to tailor approach to their needs and individual Agents where possible

LLOYD'S VIEWS SELF-ASSESSMENTS AS THE STARTING POINT FOR STANDARDS ASSESSMENT

- ► A self-assessment will be completed for each standards group over the next 2 -3 years
- The main features of the new consistent approach are:
 - Standalone document with no supplementary documentation attached
 - Explains exactly how the Agent meets each standard, lists controls and evidence
 - Satisfactory action plan in place to address all gaps or failings
 - Lloyd's provides a written response to every Agent
- Further benefits will include:
 - Clear message to every Agent that their Board is responsible for ensuring compliance with the Standards.
 - A consistent, robust approach to this assurance activity for all groups of standards
 - Provide a baseline against which Lloyd's technical teams can test when carrying out further assurance activities
- Not designed to test the effectiveness of agent processes or controls

THE PRIMARY PURPOSE IS TO ASSESS WHETHER AN AGENT MEETS ONE OR MORE OF THE STANDARDS

- Can be triggered as part of Lloyd's BAU standards review schedule or to investigate syndicate specific concerns or market-wide thematic issues
- Establish whether an Agent's self-assessment process is robust
- ► Identify gaps/ failings and consider consequences for oversight of the Agent
- The features will include:
 - Minimum 2 person review team including a subject matter expert
 - Scope including assessment plan issued to Agents
 - Assessment phase (design, operation, people and effectiveness)
 - Verbal feedback followed by written draft report, issued to SNP and responsible Director
 - Conclusions supported by rationale and evidence
 - Final report includes action plans to address gaps or failings with agreed timescales to be monitored as BAU

AGENDA

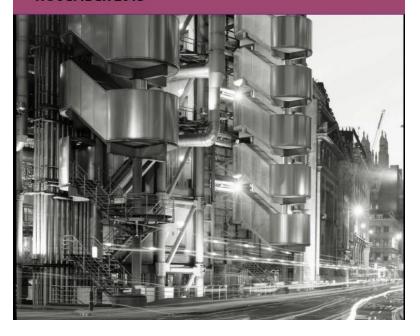
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2014 GUIDANCE NOTES

LLOYD'S

SOLVENCY II & RISK ASSURANCE 2014 DRAFT GUIDANCE NOTES

NOVEMBER 2013



- Published 26 November
- Feedback by Monday 16 December
- ► Feedback through your Account Manager or via solvency2@lloyds.com

2014 DRAFT TIMETABLE

| KEY DATES | FOR 2014 | | | | | | | | | | A | PPENDIX 2 |
|--|---|--|---|--|--------------------------------------|--|--|---|---|---|----------------------------|-----------------------------|
| SOLVENCY II QUANTITATIVE SUBMISSIONS | 14 January Q4 2013 GQD return | FEBRUARY | MARCH 6 March SII Balance Sheet @31/12/13 20 March 2014 SCR Re- assessment 20 March LIM Asset Data @31/12/13 | 3 April TPD @ 31/12/13 | 30 May Standard Formula SCR | JUNE | (provisional) 3 July Draft SCR via LCR 10 July Q2 2014 GQD Return | 21 August SII Balance Sheet @30/6/14 | (provisional) 12/19 Sept (aligned/ non- aligned) Final SCR via LCR 25 Sept SREP Annual reporting | 9 October Q3 2014 GQD return (provisional) 30 October LIM Asset Data @30/09/14 | NOVEMBER | DECEMBER |
| SOLVENCY II QUALITATIVE SUBMISSIONS | | | 27 March OR SA Submission | | to 30 May Inction Report | | (provisional) 3 July Voluntary Interim Validation (provisional) 3 July Model Change Policy & Report | | Date TBC Validation Report (provisional) 19 Sept Model Change Report | 30 October Board confirmation of SII status | | |
| SOLVENCY II THEMATIC REVIEW | | | ibution & testing | | | | | | | | Use test review | |
| RISK ASSURANCE/ MINIMUM STANDARDS | | | | | | | | | | PMD Underwriting Standards Self Assessment | | |
| WORKSHOPS/ BRIEFINGS | (provisional) 21 & 22 Jan Capital briefing 7 & 8 January | 11 & 12 Feb UW stds self assessment + new stds update 25 & 26 February | 11 & 12 March Claims Self Assessment feedback 25 & 26 March | 1 & 2 April Director Briefing 22 & 23 April | 6 & 7 May Validation/ Capital | 3 & 4 June VBAL/ SREP 24 & 25 June GRMU workshop | 1 & 2 July Standards Launch | | 9 & 10 Sept GRMU min stds & model change feedback | 13 & 14 October Director Briefing | 24 & 25 Nov VBAL/ \$REP | 9 & 10 Dec 2015 Planning |

WHAT'S NEW FOR 2014

- 2014 plan covers both Solvency II and Risk Assurance
- In early 2013, Lloyd's introduced a "phasing of Solvency II workstreams"
- ▶ All elements of the Lloyd's programme were categorised as either:
 - A full Solvency II hard requirement: expected to meet SII standards (e.g. SCR)
 - Solvency II soft requirement: should be operational and Lloyd's will review submissions and provide feedback as appropriate (e.g. Validation)
 - Required to current level: expected to meet ICAS, Solvency I, and/ or Lloyd's minimum standards (e.g. Risk Management)
 - Solvency II "slow down": remains "in project (e.g. Pillar 3 reporting)
- Approach remains appropriate for 2014, but some items move "up" a level:
 - Standard Formula SCR moves from "slow down" to "soft requirement"
 - Data Directory and Data Policy moves from "required to current level" to "SII soft requirement".
 - Profit & Loss Attribution and Backtesting moves from "slow down" to "soft requirement"
- Pillar 3 Dry run to take place Q3 2014

PILLAR 3 DRY RUN CONFIRMED FOR Q3 2014

- Dry run intended to help Lloyd's and agents prepare for Guidelines
- Quantitative requirements based on Guidelines for annual reporting using December 2013 data
- No qualitative dry run
- Agent senior person review for reasonableness expected but no formal Board sign-off
- Specific dry run support will be provided:
 - Instructions in Spring 2014
 - Agent workshops in June 2014
 - Follow up workshops giving feedback in November 2014
 - Individual feedback to agents Q4 2014

WHAT'S NEW FOR 2014

- Minimum Standards Self Assessments
 - The beginning of a cycle of self assessment of all minimum standards spanning 2-3 years
 - Underwriting Standards Self Assessment in October 2014
 - Self assessments will ultimately replace the need for evidence templates
- ► In addition to timetabled submissions as set out in 2014 plan, agents will need to provide evidence as to how/ whether full tests and standards are being met

WORKSHOPS IN 2014

- Solvency II themed workshops as before
- ▶ 2 Directors' Briefings
- ► In 2014 we are also including Risk Assurance, including Minimum Standards, workshops into our timetable:

| Feb 2014 | New Min Standards update |
|------------------------------|---|
| March 2014 | Claims Self Assessment Feedback |
| July 2014 | Minimum Standards Launch |
| September 2014 (provisional) | Underwriting Standards Self Assessments |

TABLE DISCUSSION

- Any thoughts/ comments on the overall Risk Assurance Framework and Minimum Standards refresh?
- ► Lloyd's will need some form of evidence during 2014 of agents' compliance with full Solvency II tests and standards. One way of doing this would be to re-issue the Evidence Templates. Do you have any other ideas about how this evidence could be presented?
- Feedback/ thoughts on the 2014 Draft Guidance Notes and Timetable

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COMING UP IN Q1 2014...

JANUARY

FEBRUARY

MARCH

Mapping to Guidelines

Rating against full SII tests and standards

Capital Briefing

Model Change feedback

Review of P&L Attribution & backtesting

ORSA submission

Use Test interviews

Market wide consultation on Minimum standards

Claims Selfassessment feedback

WHAT HAPPENS NEXT?

- Slides will be made available on lloyds.com after both sessions
- Next scheduled workshop/briefings:
 - Capital briefing January
- 2014 Timetable and Guidance to be published as final
- Formal feedback letters from reviews of October attestations
- Account Managers will be in touch early in the New Year

