

Workshop on the new UAE regulations

Impact of new UAE Insurance regulations on insurance companies' ERM

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- 1. Risk profile and ERM capabilities**
- 2. New regulations and their impact**
- 3. Impact on industry performance**
- 4. Some final thoughts**

1. Risk profile and ERM capabilities

2. New regulations and their impact

3. Impact on industry performance

4. Some final thoughts

Risk profile varies by market and by company



RISK PROFILE



RISK PROFILE DEPENDS ON:

- Line and type of business
- Market profile (growth, competition etc)
- Investments
- Liquidity
- Operating environment (regulation, legislation etc)
- etc

Matching risk profile to ERM capabilities

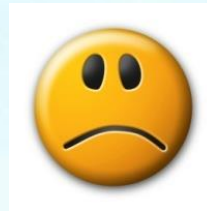


Matching risk profile to ERM capabilities



A company's risk management capability needs to meet its risk profile

RISK PROFILE



Risk management capability well below company's risk profile

RISK MANAGEMENT CAPABILITY



Matching risk profile to ERM capabilities



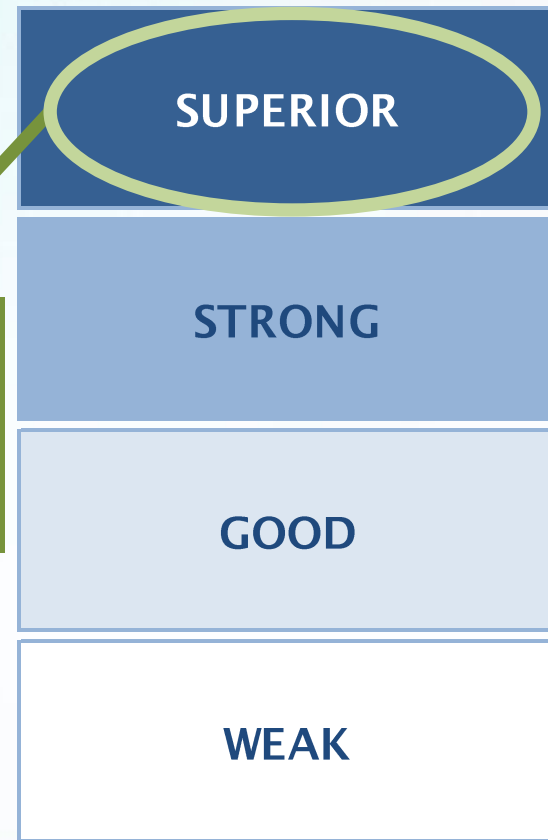
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RISK PROFILE



Risk management capability well above company's risk profile

RISK MANAGEMENT CAPABILITY



Agenda



1. Risk profile and ERM capabilities

2. New regulations and their impact

3. Impact on industry performance

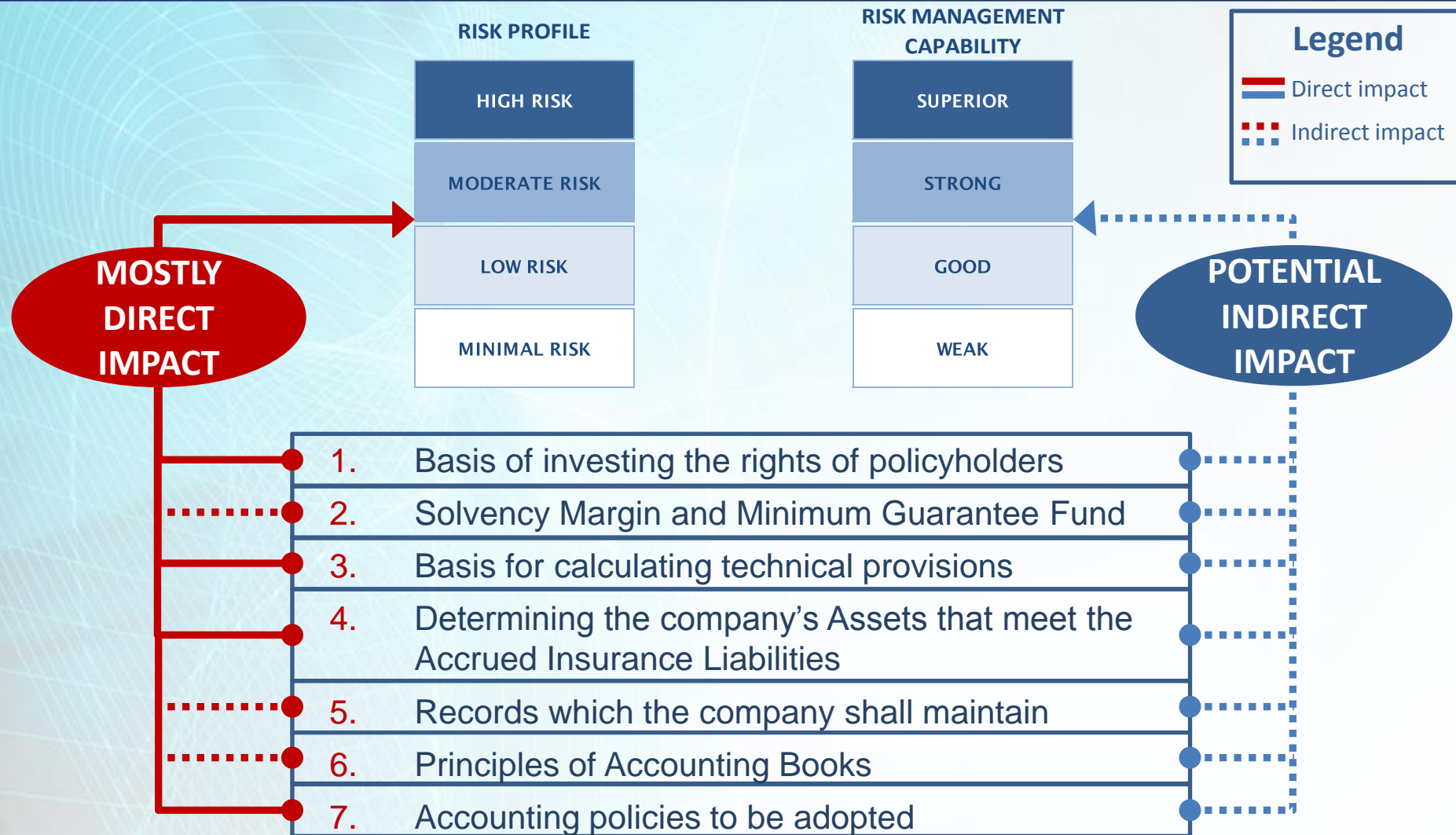
4. Some final thoughts

The new UAE regulations



1. Basis of investing the rights of policyholders
2. Solvency Margin and Minimum Guarantee Fund
3. Basis for calculating technical provisions
4. Determining the company's Assets that meet the Accrued Insurance Liabilities
5. Records which the company shall maintain
6. Principles of Accounting Books
7. Accounting policies to be adopted

...and their impact on companies' Risk Profile and ERM capabilities



1. Basis of investing the rights of policyholders **AND**
4. Assets that meet the Accrued Insurance Liabilities



KEY PROVISIONS OF NEW REGULATIONS

- Introduction of new limits per category of investment
- Companies must have investment and risk management policies which will be in line with the company's risk appetite
- Assets need to match the insurance liabilities assumed
- Companies will establish investment committee
- Need to document Contingency funding
- Companies to conduct stress testing
- Investment for Accrued Liabilities to be in line with "prudent person" principle

ELEMENTS OF RISK PROFILE

Investments

HIGH RISK

Low rated fixed income
Concentrations, illiquid
High % in equities
Speculative derivatives

MEDIUM RISK

Mostly highly rated
Mostly liquid
Moderate % in equities
Minimal speculation

LOW RISK

Mostly highly rated
Mostly liquid
Moderate % in equities
Minimal speculation

Liquidity

HIGH RISK

Investment portfolio illiquid
No outside sources of liquidity
Mismatch in liquidity available vs. liquidity demands of product portfolio

MEDIUM RISK

Relatively well matched asset/liability portfolio
Riskier assets matched to surplus
Liabilities more protected from surrender charges

LOW RISK

No upcoming debt maturities
Strong cash/cash flow available
Sticky liabilities less likely to surrender

POTENTIAL IMPACT ON ERM

- Companies forced to define proper risk appetite
- Companies establish independent investment committees

IMPACT ON RISK PROFILE

- Significant de-risking of some investment portfolios
- Improved liquidity

2. Solvency Margin and Minimum Guarantee Fund



KEY PROVISIONS OF NEW REGULATIONS

- Introduction of new Solvency Template for calculation of regulatory / solvency capital
- Minimum Capital Requirement (MCR) not linked to riskiness of operations
- Minimum Guarantee Fund (MGF) and Solvency Capital Requirement (SCR) linked to the new Template
- Companies obliged to have in place a documented risk management framework
- Companies to submit Solvency Template annually – template to be validated by the Actuary

CURRENT MARKET PRACTICE

- Few companies have capital management tools (capital, ALM, cat-models)
- In most cases capital requirements are defined as “solvency capital” requirements
- Some cases whereby capital models are the responsibility of technical staff alone

POTENTIAL IMPACT ON ERM

- Gradual improvement of understanding of riskiness of investment operations
 - Possibility of companies adopting new Template as internal capital model
- OR**
- View new regime as an additional inconvenience

3. Basis for calculating Technical Provisions



KEY PROVISIONS OF NEW REGULATIONS

- Companies to appoint Actuary who is registered by the Authority.
- The Actuary to:
 - Review and approve the Technical Provisions
 - Assess the quality of the data
 - Provide the IA with annual report with current and future risks
 - Be professionally liable for the advice
- The Company shall report quarterly to the Authority and submit annually to the IA

ELEMENTS OF RISK PROFILE

Data quality

HIGH RISK

Poor data quality
Data outdated
Inappropriate for decision

MEDIUM RISK

Some data missing
Some data miscoded/bulk

LOW RISK

High quality data
Obtained quickly
Adequate for decision
Regular testing of data

POTENTIAL IMPACT ON ERM

- In the medium-to-long term companies can develop the ability to link pricing with experience. This can lead to review of:
 - Risk appetite
 - Strategy

IMPACT ON RISK PROFILE

- Improvement in data quality
- Independent verification of data

5. Records which the company shall maintain
6. Principles of Accounting Books
7. Accounting policies to be adopted



KEY PROVISIONS OF NEW REGULATIONS

- Retention of records for at least 10 years
- Accounting to be in accordance with IFRS for all companies
- Quarterly and annual audited reporting (quarterlies with “limited review” of external auditors)

ELEMENTS OF RISK PROFILE

Data quality

HIGH RISK

Poor data quality
Data outdated
Inappropriate for decision

MEDIUM RISK

Some data missing
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LOW RISK

High quality data
Obtained quickly
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POTENTIAL IMPACT ON ERM

- Only as a side-effect

IMPACT ON RISK PROFILE

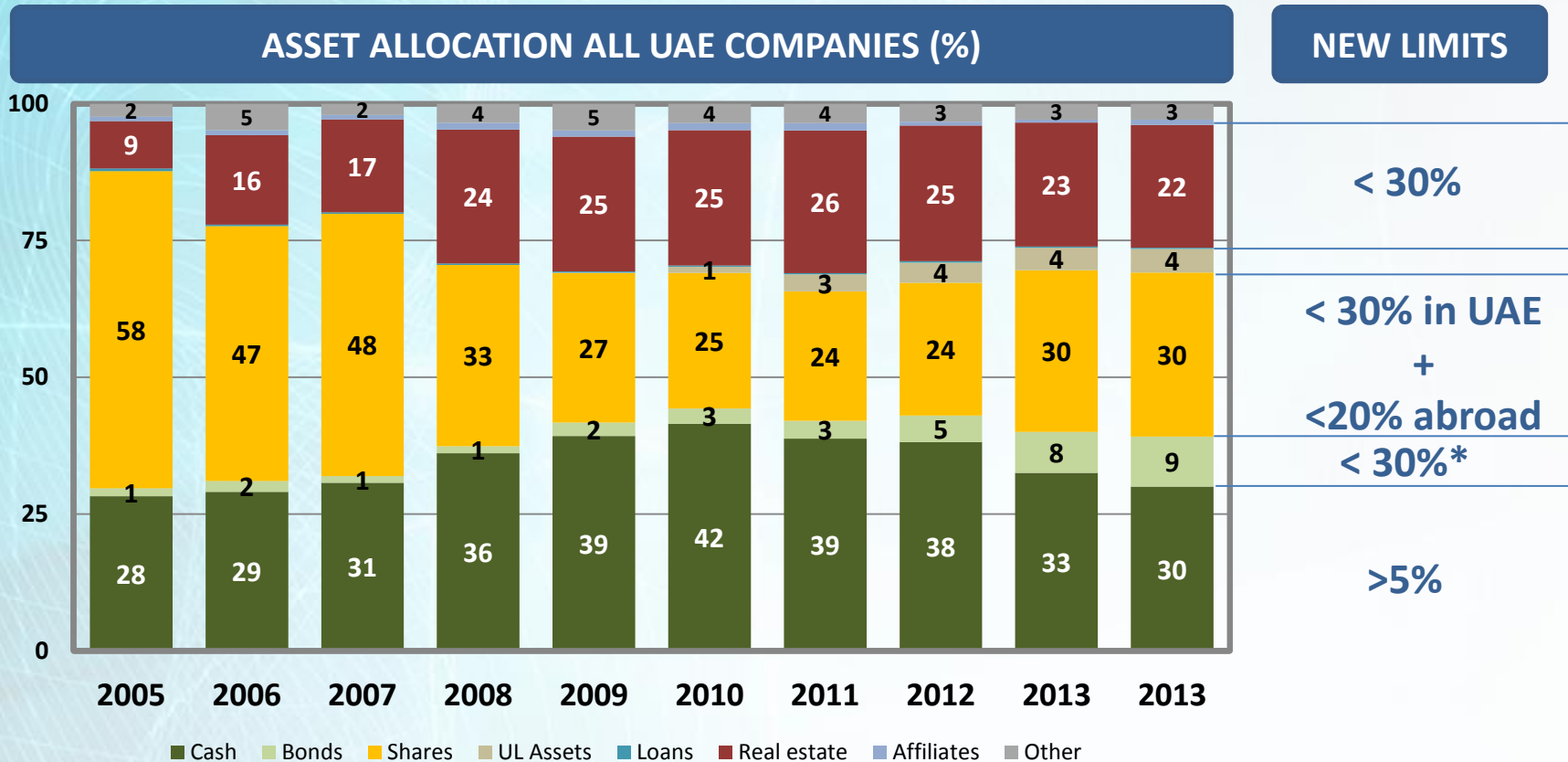
- May arise out of introduction of IFRS and difference in valuation of both assets and liabilities

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No impact on asset allocation for the industry as a whole



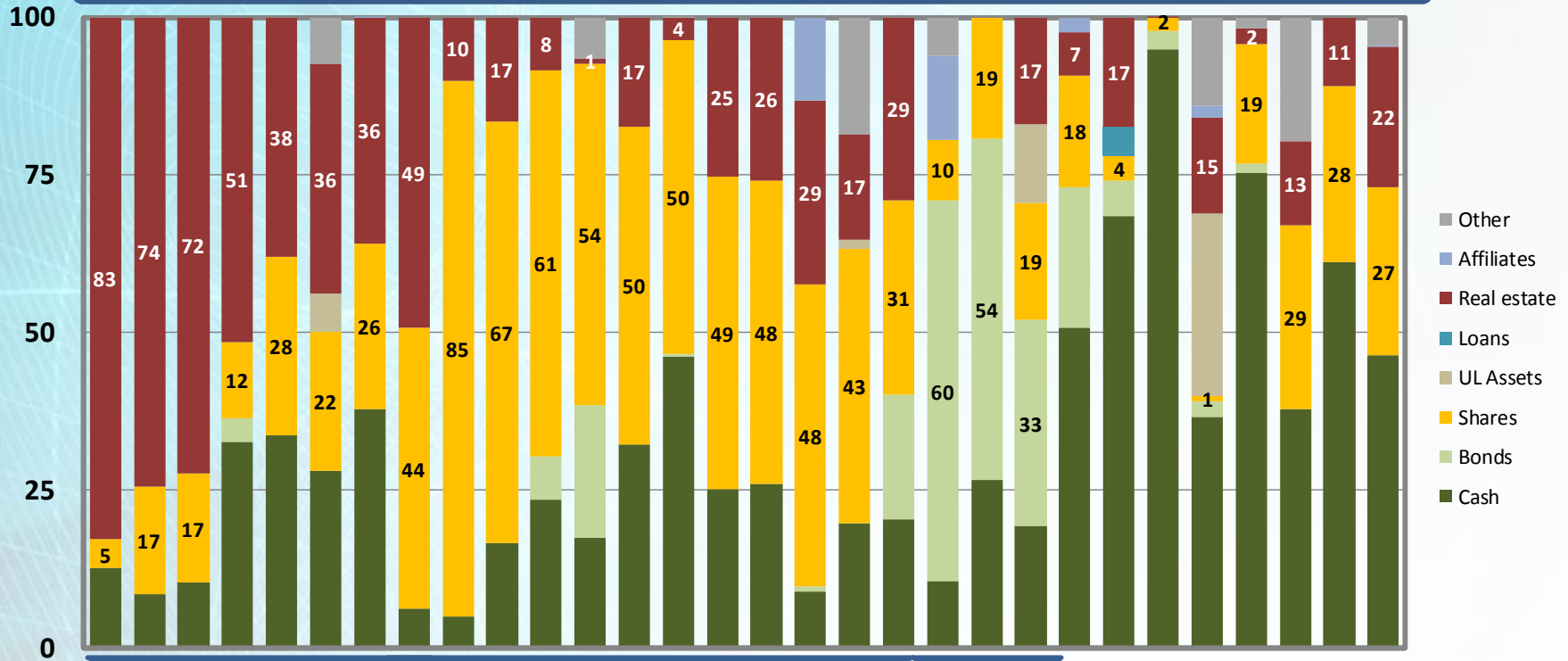
Source: AM Best - Statement File Global

* For Government Bonds the limits are:
 - 100% for UAE Government issues and
 - 80% for other "A" rated sovereigns

Significant impact for several companies



COMPANY-SPECIFIC ASSET ALLOCATION 31/12/2014 (%)



COMPANIES

EXCESSIVE REAL ESTATE

8 companies

EXCESSIVE EQUITIES

12 companies

EXCESSIVE BONDS (?)

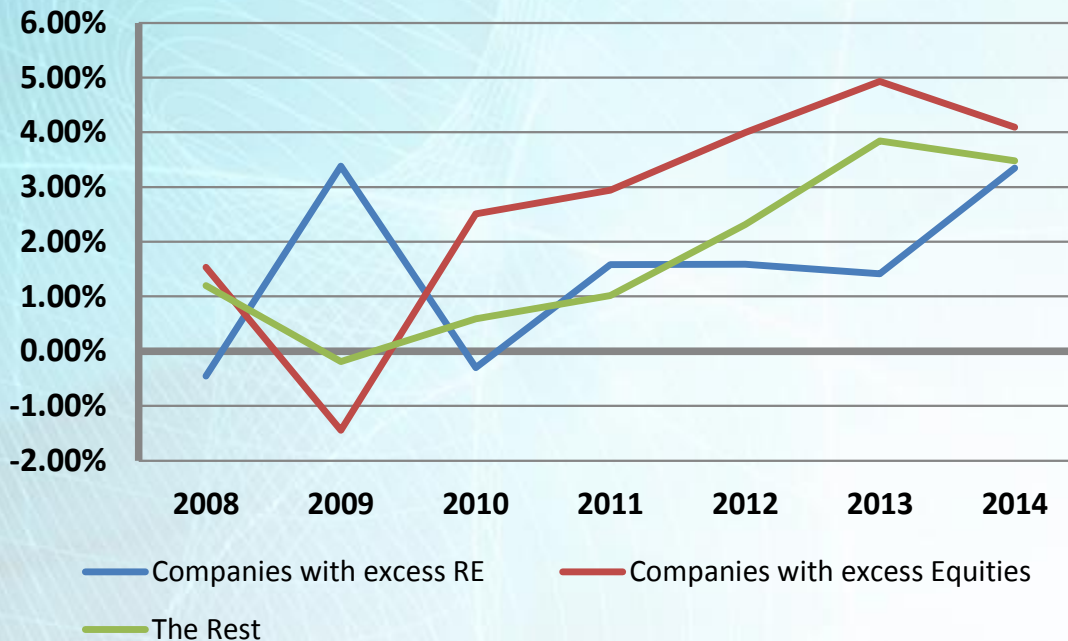
3 companies

Source: AM Best - Statement File Global

Asset reallocation will reduce investment volatility



HISTORICAL INVESTMENT YIELD
BY INVESTMENT STRATEGY



Source: AM Best - Statement File Global

- Reallocating assets to comply with new regulation will reduce investment volatility
- Some companies will have to realise capital losses due to the illiquid nature of both Real Estate and local Equity markets
- However, this is unlikely to be the main driver for renewed focus on technical profitability

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Story of two companies



COMPANY "A"

COMPANY "B"

GWP	100,000	100,000
Claims reserves	380,000	380,000
Reinsurance	XoL	Q/S
Effective cession rate	5% of GWP 2% of claims reserves	98% of GWP 98% of claims reserves
Rationale	Consistent with our risk appetite	Consistent with our previous practice

Question: Which of the two strategies should the regulatory regime encourage?

Story of two companies



COMPANY "A"

GWP 100,000
Claims reserves 380,000
Reinsurance XoL
Effective cession rate 5% of GWP
 2% of claims reserves
Rationale Consistent with our risk appetite

COMPANY "B"

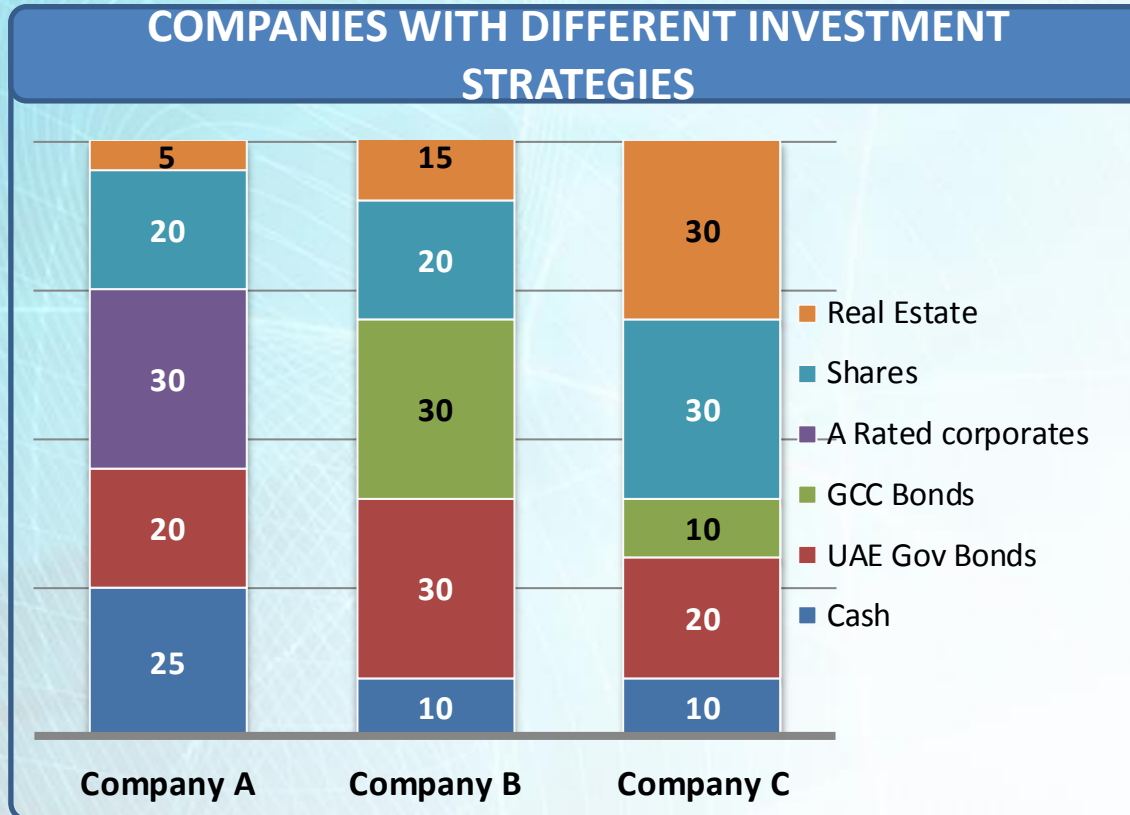
GWP 100,000
Claims reserves 380,000
Reinsurance Q/S
Effective cession rate 98% of GWP
 98% of claims reserves
Rationale Consistent with our previous practice

RESULTS OF THE SOLVENCY TEMPLATE

U/W risk NL	74,480	38,000
U/W risk Life	0	0
Investment Risk	0	0
Credit Risk	1	9,820
BSCR	74,480	39,248
Operational Risk	11,400	11,400
SCR	85,880	50,648
MGF	28,627	16,833

Risk factor = 2.088% !

Story of three companies



- All three strategies are acceptable under new regime
- Key factors in decision making:
 - Availability of capital
 - Regulatory capital requirements
- Company B likely to have the lowest regulatory capital requirements for its investments (dependent on liquidity charges)

Hurdles to implementation



- Available skill set in the market could result in IA and the companies depending on advisors for a long time
- Entrenched practices and opinions among current insurance Board Members
- Market inertia

FAILURE TO IMPLEMENT WILL BE WORSE THAN NEVER HAVING ISSUED THE NEW REGULATIONS