

2023 Questionnaire
for the April 2023 Insurance Capital Standard (ICS) Data Collection Exercise of the
Monitoring Period Project

("the ICS Questionnaire")

The ICS Questionnaire has been developed as a supporting document for groups participating in the 2023 ICS Data Collection Exercise and must be read in conjunction with the associated ICS Technical Specifications Part 1 and Part 2, ICS data collection Template and Yield Curve documentation. All documents are provided for information only.

These documents do not replace or supersede the ICS Level 1 and Level 2 documents, which have been agreed and published by the IAIS.



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1 Introduction

This Questionnaire focuses on supplementary information in relation to data provided in the Template for the April 2023 ICS Data Collection Exercise of the Monitoring Period Project, and is due **31 August 2023**.



2 Identification

1	Please provide the name of your IAIG/Volunteer Group below:	
	IAIG / Volunteer Group name	
	Insert text	
2	Please indicate the date of submission of this questionnaire (dd/mm/yyyy). If an earlier submission of this Questionnaire has been updated please indicate a new date here:	
	Date of this submission	
	Insert text	
3	Please indicate the name of the contact persons for queries about the responses to this Questionnaire, including email address and telephone number.	
	Primary Contact	Information
	Name:	Insert text
	Email:	Insert text
	Phone:	Insert text
	Backup Contact	Information
	Name:	Insert text
	Email:	Insert text
	Phone:	Insert text



3 General Questions

Template sheet(s) referred to in this section:	Various
Key Technical Specification section(s) relevant to this section	Various

4	Were any material assumptions or simplifications used when providing data on the reference ICS (Technical Specifications – Part 1)? Examples of assumptions or simplifications follow the questions.						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, complete the following question for <u>each</u> material assumption or simplification used. Please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description with sufficient detail to allow an assessment of materiality and potential impact. In the description, also indicate whether you anticipate future reliance on the assumption or simplification or was it due to circumstances such as a resource constraint. <table border="1"> <thead> <tr> <th>Item name</th><th>Reference</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td><td>Insert text</td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i> Examples where assumptions or simplifications may have been used: 8.2 Deferred tax from the ICS Adjustments – Was difficulty encountered being able to offset deferred taxes arising from the ICS Adjustment where an assumption or simplification was used?	Item name	Reference	Description	Insert text	Insert text	Insert text
Item name	Reference	Description					
Insert text	Insert text	Insert text					
5	Were any material assumptions or simplifications used when providing data on the candidate ICS as a PCR (Technical Specifications – Part 2)? Examples of assumptions or simplifications follow the questions.						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, complete the following question for <u>each</u> material assumption or simplification used. Please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description with sufficient detail to allow an assessment of materiality and potential						

	impact. In the description, also indicate whether you anticipate future reliance on the assumption or simplification or was it due to circumstances such as a resource constraint. <table border="1" data-bbox="252 338 1490 479"> <thead> <tr> <th>Item name</th><th>Reference</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td><td>Insert text</td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i> Examples where assumptions or simplifications may have been used: 8.2 Deferred tax from the ICS Adjustments – Was difficulty encountered being able to offset deferred taxes arising from the ICS Adjustment where an assumption or simplification was used?	Item name	Reference	Description	Insert text	Insert text	Insert text
Item name	Reference	Description					
Insert text	Insert text	Insert text					
6	With respect to ICS Version 2.0 (Technical Specifications – Part 1), were any material changes made in reporting data between Years 3 and 4 of the Monitoring Period (eg simplifications that were used last year that are no longer being used)?						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description as well as rationale for its relevance to analysis. Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact. <table border="1" data-bbox="252 1245 1490 1386"> <thead> <tr> <th>Item name</th><th>Reference</th><th>Description and rationale</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td><td>Insert text</td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Item name	Reference	Description and rationale	Insert text	Insert text	Insert text
Item name	Reference	Description and rationale					
Insert text	Insert text	Insert text					
7	Did you have any difficulties interpreting and/or applying the main changes between ICS Version 2.0 and the candidate ICS as a PCR (which appear in tracked changes in the Technical Specifications – Part 2)?						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please specify the difficulties encountered for each of the items listed in the table below. <table border="1" data-bbox="252 1809 1490 1874"> <thead> <tr> <th>Item name</th><th>Reference</th><th>Description</th></tr> </thead> <tbody> </tbody> </table>	Item name	Reference	Description			
Item name	Reference	Description					

	MAV – Middle bucket criteria If relevant, please provide the type of product, the difficulties and whether these difficulties blocked these products from entering the Middle Bucket.	§§120-121	
	MAV – Middle Bucket spread adjustment	Section 5.2.5.3.2.3	
	MAV – General Bucket spread adjustment	Section 5.2.5.3.2.4	
	MAV – Modulation factor	Section 5.2.5.3.2.5	
	Capital resources – Tier 1 limited criteria	§§193-194	
	Capital resources – Tier 2 Paid-up criteria	§§195-197	
	Capital resources – Limit on non-controlling interests	Section 6.4.4	
	Non Default Spread Risk	Section 7.3.3	
	Equity risk – differentiated treatment for infrastructure equity	Section 7.3.4 and Annex 3	
	Equity risk – Neutral Adjusted Dampener	Section 7.3.4	
	Credit risk – differentiated	§491, Table 26 and Annex 3	

	treatment for infrastructure debt								
	Non-insurance risk charge – treatment of non-insurance non-banks	§§599 and 601							
	Tax effect on the ICS Capital requirement	§§636 and 637							
	Other methods – Use of Supervisor-Owned and Controlled Credit Assessments	Section 9.1							
	Other methods – Use of internal models	Section 9.2 and Annex 4							
8	Do you have further comments regarding the candidate ICS as a PCR not specifically addressed elsewhere in the Questionnaire? Where appropriate, this includes comments on data, additional relevant data, and/or calculations that you consider relevant to the analysis (that is, have the potential to have a material impact on any conclusions reached based on the data and/or its analysis).								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description as well as rationale for its relevance to analysis. Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact. <table border="1"> <thead> <tr> <th>Item name</th><th>Reference</th><th>Description and rationale</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td><td>Insert text</td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>			Item name	Reference	Description and rationale	Insert text	Insert text	Insert text
Item name	Reference	Description and rationale							
Insert text	Insert text	Insert text							



4 Perimeter of the ICS Calculation

Template Sheets referred to in this section:	GAAP and ICS Balance Sheets
Key Technical Specification – Part 2 sections relevant to this section	4. Reference ICS: Perimeter of the ICS Calculation

9	For the starting ICS balance sheet, did you encounter any difficulties splitting the insurance and non-insurance operations? Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please provide a description of issues that were encountered. <table border="1"> <thead> <tr> <th>Amount</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Amount	Description	Insert text	Insert text
Amount	Description				
Insert text	Insert text				
10	For the non-insurance portion of the ICS balance sheet, did you encounter any difficulties re-stating consolidated entities in your consolidated GAAP to a different basis of accounting (eg, joint ventures and joint operations)? Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please provide a description of issues that were encountered. <table border="1"> <thead> <tr> <th>Amount</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Amount	Description	Insert text	Insert text
Amount	Description				
Insert text	Insert text				
11	Has an amount been reported in the worksheet <i>GAAP and ICS Balance Sheets</i>, table <i>Balance sheets</i>, Row (-) <i>adjustments already included in other equity items</i>?				

	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please provide a description of what was included in the amount in sufficient detail to understand why the offset was necessary. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr style="background-color: #d3d3d3;"> <th style="width: 15%;">Amount</th> <th>Description</th> </tr> <tr> <td style="height: 30px; vertical-align: top;">Insert text</td> <td style="height: 30px; vertical-align: top;">Insert text</td> </tr> </table> <i>(Add additional rows as necessary)</i>	Amount	Description	Insert text	Insert text		
Amount	Description						
Insert text	Insert text						
12	Has an amount been reported in the <i>Other</i> line in the <i>Equity</i> section of the worksheet <i>GAAP and ICS Balance Sheets</i>?						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please provide additional information on the amount so that the IAIS can determine whether that amount should be included within ICS capital resources. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr style="background-color: #d3d3d3;"> <th style="width: 20%;">Amount</th> <th>Description</th> </tr> <tr> <td style="height: 30px; vertical-align: top;">Insert text</td> <td style="height: 30px;"></td> </tr> <tr> <td style="height: 30px;"></td> <td style="height: 30px;"></td> </tr> </table> <i>(Add additional rows as necessary)</i>	Amount	Description	Insert text			
Amount	Description						
Insert text							



5 Market-Adjusted Valuation

MP Template Sheets referred to in this section:	GAAP and ICS Balance Sheets
Key MP Technical Specification – Part 2 sections relevant to this section	5. Reference ICS: Market-Adjusted Valuation

13	Are there any type of products that qualify for the Middle Bucket, that do not qualify under ICS Version 2.0? If yes, please explain which types and why. Please specify the Current Estimates of these products under ICS Version 2.0 (in the General Bucket) and under the Candidate ICS as a PCR (in the Middle Bucket).																			
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable <table border="1"> <thead> <tr> <th>Type of product</th> <th>Description and rationale</th> <th>Current Estimate in General Bucket</th> <th>Current Estimate in Middle Bucket</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> (Add additional rows as necessary)				Type of product	Description and rationale	Current Estimate in General Bucket	Current Estimate in Middle Bucket	Insert text	Insert text										
Type of product	Description and rationale	Current Estimate in General Bucket	Current Estimate in Middle Bucket																	
Insert text	Insert text																			
14	Were either of the possible proxies for non-life premium liabilities applied?																			
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please indicate which proxy was used and provide details on the difficulties faced in the calculation of non-life premium liabilities. Provide details on alternative proxies (including formulas) which the IAIS could consider (references/ links to external sources are also welcome). <table border="1"> <thead> <tr> <th>Item name</th> <th>Description and rationale</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>				Item name	Description and rationale	Insert text	Insert text												
Item name	Description and rationale																			
Insert text	Insert text																			

	<i>(Add additional rows as necessary)</i>								
15	Was the IAIS base yield curve methodology applied to any additional currency beyond the 35 for which the IAIS published data?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe any difficulties experienced with the process. Please describe in summary. <table border="1"> <thead> <tr> <th>Item name</th> <th>Description and rationale</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								

6 Capital Requirement

6.1 Equity risk charge

Template Sheets referred to in this section:	N/A
Key Technical Specification – Part 2 sections relevant to this section	7.3.4 Equity risk

16	Regarding the Neutral Adjusted Dampener (NAD) introduced for the calculation of the Equity risk charge, are regional calibrations needed to reflect market specificities?
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable

If YES, please provide suggestions how regional calibrations could be developed (methodology and input data), and how regional NAD could be framed in practice within the Equity risk charge calculation.

Item name	Description and rationale
Insert text	Insert text

(Add additional rows as necessary)

6.2 Self-assessment template for natural catastrophe models

Template Sheets referred to in this section:	N/A
Key Technical Specification – Part 2 sections relevant to this section	7.2.4.7 Safeguards for Natural Catastrophe Models

17	<u>Safeguard 1 – Description of the scope of application</u> <i>The IAIG describes the perimeter of the natural catastrophe model's calculation.</i> Is Safeguard 1 met?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe the scope of application of the natural catastrophe model. <table border="1"> <tr> <th>Item name</th> <th>Description and rationale</th> </tr> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </table> (Add additional rows as necessary)	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								
18	Do you have any natural catastrophe models that were developed internally?								

	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe the scope of application of each CAT model. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="width: 30%;">Item name</th> <th>Description and rationale</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								
19	<u>Safeguard 2 – Validation</u> <i>The IAIG demonstrates that a rigorous process is in place by which they can establish whether their natural catastrophe model framework is sound or whether improvements are needed.</i> Is Safeguard 2 met?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, Please describe the validation process for the CAT model. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="width: 30%;">Item name</th> <th>Description and rationale</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								
20	<u>Safeguard 3 – Sign-off by senior management</u> <i>The senior management of the IAIG has ownership of the natural catastrophe model, and the model complies with the validation process prescribed by the natural catastrophe model governance process.</i> Is Safeguard 3 met?								

	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If NO, please explain whether a change is planned and the expected timeline. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Item name</th> <th>Description and rationale</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								
21	<u>Safeguard 4 – Statistical quality test</u> <i>The statistical quality test addresses issues related to the following technical aspects of the natural catastrophe model:</i> <i>methodology and assumptions;</i> <i>coverage of material risks;</i> <i>data (including external data) and expert judgment;</i> <i>aggregation of risks and diversification effects;</i> <i>consistency with the method used for the calculation of technical provisions;</i> <i>allowance for risk mitigation techniques and future management actions; and</i> <i>financial guarantees and contractual options.</i> Is Safeguard 4 met?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe in summary how statistical quality tests are used in the natural catastrophe model. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Item name</th> <th>Description and rationale</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								

	<i>(Add additional rows as necessary)</i>								
22	<u>Safeguard 5 – Use test and governance</u> <i>The use test reflects the IAIG's view of its risks and is used in decision-making.</i> Is Safeguard 5 met?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe, in summary, how the use test is carried out, as well the model governance and internal controls at different stages of the model. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="width: 30%;">Item name</th><th>Description and rationale</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td></tr> <tr> <td> </td><td> </td></tr> <tr> <td> </td><td> </td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								
23	<u>Safeguard 6 – Documentation standards</u> <i>The documentation of the natural catastrophe model includes its use and other related aspects, such as:</i> <i>facilitates the supervisory review of the model;</i> <i>facilitates Senior Management's understanding; and</i> <i>recognises the weaknesses of the model.</i> Is Safeguard 6 met?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe, in summary, the documentation that is currently available. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="width: 30%;">Item name</th><th>Description and rationale</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td></tr> <tr> <td> </td><td> </td></tr> </tbody> </table>	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								



	(Add additional rows as necessary)								
24	Safeguard 7 – List of catastrophe risk sources that are not modelled <i>The IAIG recognises the limitations in the scope of their natural catastrophe model. IAIGs make a list of natural catastrophe risks specified in the ICS but not modelled, and explain why those risks are not modelled.</i> Is Safeguard 7 met?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please list those natural catastrophe risks that are not modelled, the reason those risks are not modelled, and an assessment of the impact. <table border="1"> <thead> <tr> <th>Item name</th> <th>Description and rationale</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table> (Add additional rows as necessary)	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								

6.3 Non-insurance risk charges

Template Sheets referred to in this section:	ICS Non-Insurance & Baseline
Key Technical Specification – Part 2 sections relevant to this section	7.7 Non-Insurance Risk Charges

25	For the non-insurance entities reported as equity method investments (eg, joint ventures and joint operations) that are consolidated under GAAP, were there any reporting issues?
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable



If YES, please describe the issue that you encountered.

Item name	Reference	Description and rationale
Insert text	Insert text	

(Add additional rows as necessary)

7 Additional Reporting

7.1 GAAP Plus

Template Sheets referred to in this section:	<i>ICS Summary.GAAP+</i> <i>ICS Balance Sheet.GAAP+</i> <i>Financial Instruments.GAAP+</i> <i>Tier 2 Non-Paid-Up</i> <i>ICS.GAAP+ > Insurance</i> <i>ICS > Non-Insurance & Baseline</i>
Key Technical Specification – Part 1 sections relevant to this section	9.1 GAAP Plus

26	Has an amount been reported in the worksheet <i>ICS Balance Sheet.GAAP+</i>, table <i>Balance sheets</i>, Row (-) <i>adjustments already included in other equity items</i>?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please provide a description of what was included in the amount in sufficient detail to understand why the offset was necessary. <table border="1"> <thead> <tr> <th>Amount</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> </tbody> </table> (Add additional rows as necessary)	Amount	Description	Insert text	Insert text
Amount	Description				
Insert text	Insert text				
27	Has an amount been reported in the <i>Other</i> line in the <i>Equity</i> section of the worksheet <i>ICS Balance Sheet.GAAP+</i>?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable				

	If YES, please provide additional information on the amount so that the IAIS can determine whether that amount should be included within ICS capital resources. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 20%;">Amount</th><th>Description</th></tr> <tr> <td>Insert text</td><td></td></tr> <tr> <td></td><td></td></tr> </table> <i>(Add additional rows as necessary)</i>	Amount	Description	Insert text					
Amount	Description								
Insert text									
28	Were any material reclassifications made between reported general purpose audited financial statements (GAAP) and GAAP Plus in <i>ICS Balance Sheet.GAAP+</i> (table <i>Balance sheets</i>, Column [7] <i>Reclassification from GAAP</i>)?								
	Provide your response by placing an 'x' in the relevant cell: <input style="width: 30px; height: 20px; border: 1px solid black;" type="checkbox"/> YES <input style="width: 30px; height: 20px; border: 1px solid black;" type="checkbox"/> NO <input style="width: 30px; height: 20px; border: 1px solid black;" type="checkbox"/> Not Applicable If YES, please describe the reclassifications made between reported GAAP and GAAP Plus. Reclassifications may include, for example, any amounts that are adjusted due to changes in balance sheet presentation, netting or grossing of balances, differences in the scope of the group, or application of different consolidation methods or rules. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 20px;"> <tr> <th style="width: 20%;">Item name</th><th>Description and rationale</th></tr> <tr> <td>Insert text</td><td>Insert text</td></tr> <tr> <td></td><td></td></tr> <tr> <td></td><td></td></tr> </table> <i>(Add additional rows as necessary)</i>	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								
29	Did you conclude that the reference ICS and GAAP Plus are materially the same (and hence you did not prepare a separate GAAP Plus balance sheet with explicit adjustments)?								
	Provide your response by placing an 'x' in the relevant cell: <input style="width: 30px; height: 20px; border: 1px solid black;" type="checkbox"/> YES <input style="width: 30px; height: 20px; border: 1px solid black;" type="checkbox"/> NO <input style="width: 30px; height: 20px; border: 1px solid black;" type="checkbox"/> Not Applicable								

	If YES, please describe the analyses performed to determine that the balances under GAAP Plus did not materially differ from the reference ICS, and specify the key factors in support of that determination. Please describe in summary, but with sufficient detail to allow an assessment of materiality and direction of impact. <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 30%;">Item name</th><th>Description and rationale</th></tr> <tr> <td>Insert text</td><td>Insert text</td></tr> <tr> <td> </td><td> </td></tr> <tr> <td> </td><td> </td></tr> </table> <i>(Add additional rows as necessary)</i>	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								
30	Were any GAAP Plus specifications not followed or simplifying assumptions made in calculating the GAAP Plus Balance Sheet?								
	Provide your response by placing an 'x' in the relevant cell: <input style="width: 40px; height: 20px; border: 1px solid black;" type="checkbox"/> YES <input style="width: 40px; height: 20px; border: 1px solid black;" type="checkbox"/> NO <input style="width: 40px; height: 20px; border: 1px solid black;" type="checkbox"/> Not Applicable If YES, please describe, for each GAAP Plus specification not followed and each simplifying assumption made, the impact of using such alternative treatment (from the specifications, or simplification) particularly if this may not be justifiable using the proportionality principle. Please provide your rationale for the approach taken. Please describe in summary, but with sufficient detail to allow an assessment of materiality and direction of impact. <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 30%;">Item name</th><th>Description and rationale</th></tr> <tr> <td>Insert text</td><td>Insert text</td></tr> <tr> <td> </td><td> </td></tr> <tr> <td> </td><td> </td></tr> </table> <i>(Add additional rows as necessary)</i>	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								
31	U.S. GAAP Plus – Were there any difficulties encountered when applying US GAAP Plus?								

	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact. Please list in order of difficulty. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Item Reference</th> <th>Response</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Item Reference	Response	Insert text	Insert text						
Item Reference	Response										
Insert text	Insert text										
32	IFRS GAAP Plus – Were balances reported under the IFRS GAAP Plus approach? Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If NO: 1. Explain what prevented you from reporting the data this year. 2. Would these issues or limitations be resolved before next year? If not, when would you expect them to be resolved? 3. Are there any simplifying assumptions or practical expedients that could be applied in future Field Testing that would address these issues or limitations? <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Question Reference</th> <th>Response</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td>1.</td> <td> </td> </tr> <tr> <td>2.</td> <td> </td> </tr> <tr> <td>3.</td> <td> </td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Question Reference	Response	Insert text	Insert text	1.		2.		3.	
Question Reference	Response										
Insert text	Insert text										
1.											
2.											
3.											

33	IFRS GAAP Plus – If you are an IFRS reporter (regardless of whether you reported under IFRS GAAP Plus for this year’s Field Testing) or have not answered these questions in previous years, please review the technical specifications presenting the IFRS GAAP Plus approach. Do you foresee any difficulties that you could encounter if you were to apply this approach to create an IFRS GAAP Plus balance sheet?								
	Provide your response by placing an ‘x’ in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please provide details of any anticipated difficulties in applying this approach and any solutions that you can propose. <table border="1" data-bbox="300 855 1364 1137"> <thead> <tr> <th data-bbox="300 855 608 925">Difficulty identified</th><th data-bbox="608 855 1364 925">Explanation and proposed solution</th></tr> </thead> <tbody> <tr> <td data-bbox="300 925 608 994">Insert text</td><td data-bbox="608 925 1364 994">Insert text</td></tr> <tr> <td data-bbox="300 994 608 1064"></td><td data-bbox="608 994 1364 1064"></td></tr> <tr> <td data-bbox="300 1064 608 1137"></td><td data-bbox="608 1064 1364 1137"></td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Difficulty identified	Explanation and proposed solution	Insert text	Insert text				
Difficulty identified	Explanation and proposed solution								
Insert text	Insert text								
34	IFRS GAAP Plus – Have you developed a methodology for calculating a discount rate or curve for purposes of implementing IFRS 17 under IFRS GAAP Plus?								

Provide your response by placing an 'x' in the relevant cell:

☐

YES

☐

NO

☐

Not Applicable

If YES, please describe your current thinking on this methodology including:

1. Did you use multiple curves/rates? If so please describe how these will be applied and how they might differ.
2. Did you apply a top-down or bottom-up method to develop a discount rate/curve?
3. If top-down, describe how the yield curve that reflects the current market rates of return implicit in the fair value measurement of a reference portfolio of assets was or may be determined, as well as other relevant considerations requiring judgment (e.g. what was or may be used as the reference portfolio, how a risk premium and expected default were or may be calculated and deducted).
4. If bottom-up, describe relevant considerations requiring judgement such as how a liquidity premium were or may be calculated and how the risk-free rate/curve was, or may be, constructed.
5. What was considered to be the observable period (last liquid point)?
6. Did you use a spot rate or a forward rate for the ultimate rate? How is that rate determined?
7. When does it begin to apply?
8. Describe the technique that was used, if any, to extrapolate between the last liquid point and the ultimate rate. How did or how might the discount curve construction differ by currency?
9. Describe any other adjustments that were, or may be, made.

Question Reference	Response
Insert text	Insert text
1.	
2.	

(Add additional rows as necessary)

If NO, please provide a discussion of what elements are being considered and the timeline for concluding on a discounting methodology

35	IFRS GAAP Plus – Have you developed a methodology for calculating a risk adjustment for purposes of implementing IFRS 17?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe your methodology including: 1. What method was used (eg VaR, TVaR, Cost of Capital) and what is the rationale for choosing this method? 2. What time period was used and what is the rationale for choosing that time period? 3. What risks were captured in your non-financial risks? 4. What level of aggregation was used? 5. How was reinsurance applied or addressed? 6. Did you incorporate a diversification effect? If so, please describe. 7. How did you determine your confidence level to develop a risk adjustment and what was the level? 8. How did the risk adjustment differ from the MOCE defined in the reference ICS? 9. For those products for which you used the Premium Allocation Approach, describe how/if the risk adjustment would be calculated. <table border="1"> <thead> <tr> <th>Question Reference</th> <th>Response</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td>1.</td> <td></td> </tr> <tr> <td>2.</td> <td></td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Question Reference	Response	Insert text	Insert text	1.		2.	
Question Reference	Response								
Insert text	Insert text								
1.									
2.									
36	IFRS GAAP Plus – Have you developed a policy for determining portfolio allocation for purposes of implementing IFRS 17?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, Please describe this methodology including: 1. Is the portfolio allocation under IFRS 17 more or less granular than the ICS segments? Please describe any material differences. <table border="1"> <thead> <tr> <th>Question Reference</th> <th>Response</th> </tr> </thead> <tbody> </tbody> </table>	Question Reference	Response						
Question Reference	Response								

	<table border="1"> <tr> <td>Insert text</td><td>Insert text</td></tr> <tr> <td>1.</td><td></td></tr> </table> (Add additional rows as necessary) If NO, please provide a discussion of what you are currently considering and the timeline for concluding on assigning/defining portfolios.	Insert text	Insert text	1.					
Insert text	Insert text								
1.									
37	IFRS GAAP Plus – Did you apply the Premium Allocation Approach (PAA) to any products? If you applied the PAA to any life products, please indicate this separately.								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please indicate what portion of liabilities were reported on an undiscounted basis on the GAAP Plus Balance Sheet. <table border="1"> <thead> <tr> <th>Item name</th><th>Reported amount</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td></tr> <tr> <td></td><td></td></tr> <tr> <td></td><td></td></tr> </tbody> </table> (Add additional rows as necessary)	Item name	Reported amount	Insert text	Insert text				
Item name	Reported amount								
Insert text	Insert text								
38	IFRS GAAP Plus – Did you apply the PAA to any contracts with a coverage period greater than one year?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe the products and the rationale for applying the PAA.								

	Item name	Description and rationale								
	Insert text	Insert text								
(Add additional rows as necessary)										
39	AOCI adjustment – Did you have any difficulties in applying the AOCI adjustment, if applicable?									
Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable 1. If YES, can you explain the reason for the difficulty? 2. Do you have any suggestions that would help to resolve the difficulty or clarify the technical specifications? (Add additional rows as necessary) <table border="1"> <tr> <th>Question Reference</th><th>Response</th></tr> <tr> <td>Insert text</td><td>Insert text</td></tr> <tr> <td>1.</td><td></td></tr> <tr> <td>2.</td><td></td></tr> </table> If NO, please explain why this segregation was not performed.			Question Reference	Response	Insert text	Insert text	1.		2.	
Question Reference	Response									
Insert text	Insert text									
1.										
2.										
40	Do you have any suggested improvements or refinements to the IFRS GAAP Plus Technical Specifications?									
Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable										

	If YES, please specify the improvement and the rationale for its relevance to the Field Testing analysis. Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact. <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 30%;">Item name</th> <th colspan="2">Description and rationale</th> </tr> <tr> <td>Insert text</td> <td colspan="2">Insert text</td> </tr> <tr> <td> </td> <td colspan="2"> </td> </tr> <tr> <td> </td> <td colspan="2"> </td> </tr> </table> <i>(Add additional rows as necessary)</i>		Item name	Description and rationale		Insert text	Insert text							
Item name	Description and rationale													
Insert text	Insert text													
41	Do you have further comments regarding this section? Where appropriate, this includes comments on data, additional relevant data, and/or calculations that you consider relevant to the Field Testing analysis (that is, have the potential to have a material impact on any conclusions reached based on the data and/or its analysis).													
	Provide your response by placing an 'x' in the relevant cell: <input style="width: 40px; height: 20px; border: 1px solid black;" type="checkbox"/> YES <input style="width: 40px; height: 20px; border: 1px solid black;" type="checkbox"/> NO <input style="width: 40px; height: 20px; border: 1px solid black;" type="checkbox"/> Not Applicable If YES, please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description as well as rationale for its relevance to the Field Testing analysis. Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact. <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 30%;">Item name</th> <th style="width: 20%;">Reference</th> <th>Description and rationale</th> </tr> <tr> <td>Insert text</td> <td>Insert text</td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </table> <i>(Add additional rows as necessary)</i>		Item name	Reference	Description and rationale	Insert text	Insert text							
Item name	Reference	Description and rationale												
Insert text	Insert text													



7.1.1 Reconciliations

Reconciliations: Life Insurance Liabilities - GAAP Plus to MAV

Template Sheets referred to in this section:	ICS Balance Sheet.GAAP+
Key Technical Specification sections relevant to this section	9.1 GAAP Plus

42	Reconciliation of life insurance liabilities GAAP Plus to MAV includes two user-defined columns to report any material adjustments required to move from GAAP Plus to MAV excluding changes to contract boundaries, cash flow projections and discounting. Were these columns utilised?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please provide a description for the adjustment amounts reported in each column. <table border="1"> <thead> <tr> <th>Item name</th> <th>Description and rationale</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table> (Add additional rows as necessary)	Item name	Description and rationale	Insert text	Insert text				
Item name	Description and rationale								
Insert text	Insert text								
43	Reconciliation of life insurance liabilities GAAP Plus to MAV includes a column labelled <i>other</i> to report any additional adjustments required to move from GAAP Plus to MAV excluding changes explicitly reported in previous columns. Was this column utilised?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please provide a description for the amounts reported. <table border="1"> <thead> <tr> <th>Item name</th> <th>Description and rationale</th> </tr> </thead> <tbody> </tbody> </table>	Item name	Description and rationale						
Item name	Description and rationale								



	<table border="1"> <tr> <td>Insert text</td><td>Insert text</td></tr> <tr> <td></td><td></td></tr> <tr> <td></td><td></td></tr> </table> <i>(Add additional rows as necessary)</i>	Insert text	Insert text										
Insert text	Insert text												
44	Do you have further comments regarding this section? Where appropriate, this includes comments on data, additional relevant data, and/or calculations that you consider relevant to the analysis (that is, have the potential to have a material impact on any conclusions reached based on the data and/or its analysis).												
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description as well as rationale for its relevance to the analysis. Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact. <table border="1"> <thead> <tr> <th>Item name</th><th>Reference</th><th>Description and rationale</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Item name	Reference	Description and rationale	Insert text	Insert text							
Item name	Reference	Description and rationale											
Insert text	Insert text												

Reconciliations: Non-Life Insurance Liabilities - GAAP Plus to MAV

Template Sheets referred to in this section:	ICS Balance Sheet.GAAP+
Key Technical Specification sections relevant to this section	9.1 GAAP Plus

45	Did you report any amount in the Other columns for the premium liability reconciliations?
----	---

	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe all the amounts reported as part of <i>Other</i> in each table, provide the rationale supporting your adjustments, and indicate the impact of adopting your adjustments. Please describe in summary, but with sufficient detail to allow an assessment of materiality (Please express the amounts as a % of Total Assets) and direction of impact. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="width: 15%;">Table</th> <th style="width: 35%;">Item name</th> <th style="width: 50%;">Description and rationale</th> </tr> </thead> <tbody> <tr> <td>GAAP to MAV</td> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td>GAAP to GAAP Plus</td> <td></td> <td></td> </tr> <tr> <td>GAAP Plus to MAV</td> <td></td> <td></td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Table	Item name	Description and rationale	GAAP to MAV	Insert text	Insert text	GAAP to GAAP Plus			GAAP Plus to MAV		
Table	Item name	Description and rationale											
GAAP to MAV	Insert text	Insert text											
GAAP to GAAP Plus													
GAAP Plus to MAV													
46	Do you have any other comments on the premium liability reconciliations? Where appropriate, this includes comment on data, additional relevant data, and/or calculation that you provide which you consider relevant to the analysis (that is, have the potential to have a material impact on any conclusions reached based on the data and/or its analysis).												
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please specify the item or issue and discuss it and the rationale for its relevance to the analysis. Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="width: 35%;">Item name</th> <th style="width: 65%;">Description and rationale</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>	Item name	Description and rationale	Insert text	Insert text								
Item name	Description and rationale												
Insert text	Insert text												

	<i>(Add additional rows as necessary)</i>									
47	Did you report any amounts in the <i>Other</i> columns for the claim liability reconciliation?									
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe all the amounts reported as part of <i>Other</i> in each table, provide the rationale supporting your adjustments, and indicate the impact of adopting your adjustments. Please describe in summary, but with sufficient detail to allow an assessment of materiality (Please express the amounts as a % of Total Assets) and direction of impact. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="width: 15%;">Table</th><th style="width: 35%;">Item name</th><th style="width: 50%;">Description and rationale</th></tr> </thead> <tbody> <tr> <td style="text-align: center;">GAAP to GAAP Plus</td><td style="text-align: center;">Insert text</td><td style="text-align: center;">Insert text</td></tr> <tr> <td style="text-align: center;">GAAP Plus to MAV</td><td></td><td></td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Table	Item name	Description and rationale	GAAP to GAAP Plus	Insert text	Insert text	GAAP Plus to MAV		
Table	Item name	Description and rationale								
GAAP to GAAP Plus	Insert text	Insert text								
GAAP Plus to MAV										
48	Do you have further comments regarding this section? Where appropriate, this includes comments on data, additional relevant data, and/or calculations that you consider relevant to the analysis (that is, have the potential to have a material impact on any conclusions reached based on the data and/or its analysis).									
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description as well as rationale for its relevance to the analysis. Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="width: 30%;">Item name</th><th style="width: 20%;">Reference</th><th style="width: 50%;">Description and rationale</th></tr> </thead> <tbody> <tr> <td style="text-align: center;">Insert text</td><td style="text-align: center;">Insert text</td><td></td></tr> </tbody> </table>	Item name	Reference	Description and rationale	Insert text	Insert text				
Item name	Reference	Description and rationale								
Insert text	Insert text									



	<i>(Add additional rows as necessary)</i>		



8 Internal Models

Template Sheets referred to in this section:	ICS Other Methods
Key MP Technical Specification – Part 2 sections relevant to this section	9.2 Internal Models

The purpose of this section is to enable IAIGs to provide supplementary qualitative information (with respect to the quantitative data submission) to support the assessment of the appropriateness of the use of internal models for the reference ICS. This will facilitate a better understanding of:

- The reasons for differences in outcomes between the ICS standard method and risk charges determined by internal models at the same calibration level; and
- The nature and scope of application of internal models used by IAIGs

49	Do any of the risk charges calculated using a VaR 99.5% over a one-year time horizon (in 9.2 <i>Other methods</i>) differ materially from the equivalent ICS risk charges determined according to the ICS standard method?										
Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please quantify and outline the key drivers of any material differences for each risk. Please also outline any material differences in your definition of each risk compared to that used by the IAIS. Please describe in summary, but with sufficient detail to allow an assessment of materiality and direction of impact. <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 30%;">Risk</th><th>Key drivers of differences between IAIG's reported capital amounts for regulatory purposes and ICS standard method risk charges. Please also include outline of any material differences in the definitions of risks.</th></tr> </thead> <tbody> <tr> <td>Mortality risk</td><td>Insert text</td></tr> <tr> <td>Longevity risk</td><td></td></tr> <tr> <td>Morbidity/Disability risk</td><td></td></tr> <tr> <td>Lapse risk</td><td></td></tr> </tbody> </table>		Risk	Key drivers of differences between IAIG's reported capital amounts for regulatory purposes and ICS standard method risk charges. Please also include outline of any material differences in the definitions of risks.	Mortality risk	Insert text	Longevity risk		Morbidity/Disability risk		Lapse risk	
Risk	Key drivers of differences between IAIG's reported capital amounts for regulatory purposes and ICS standard method risk charges. Please also include outline of any material differences in the definitions of risks.										
Mortality risk	Insert text										
Longevity risk											
Morbidity/Disability risk											
Lapse risk											

	Expense risk									
	Premium risk									
	Claims reserve risk									
	Catastrophe risk									
	Interest Rate risk									
	Non-default Spread risk									
	Equity risk									
	Real Estate risk									
	Currency risk									
	Asset Concentration risk									
	Credit risk									
	Operational risk									
<i>(Add additional rows as necessary)</i>										
50	Did you report other risks not captured by the ICS?									
Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe those risks and the materiality of each risk if more than one risk is reported in that cell. Please provide the rationale for modelling these risks. <table border="1"> <thead> <tr> <th>Risk name</th> <th>Description and rationale</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>			Risk name	Description and rationale	Insert text	Insert text				
Risk name	Description and rationale									
Insert text	Insert text									

51	Does the ICS standard method cover risks that are not included in your internal economic capital model(s)?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please explain why those risks are not explicitly modelled, and how this is addressed. Please describe in summary, but with sufficient detail to allow an assessment of materiality and direction of impact. <table border="1"> <thead> <tr> <th>Risk name</th> <th>Description and rationale of why the risk is not modelled</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Risk name	Description and rationale of why the risk is not modelled	Insert text	Insert text				
Risk name	Description and rationale of why the risk is not modelled								
Insert text	Insert text								
52	For the actual internal model results where the risk measure and/or confidence interval differ from 99.5% VaR over a one-year time horizon, please detail the reasons why a different target calibration is used and outline any adjustments used when providing data at 99.5% VaR over a one-year time horizon.								
	Please describe in summary, but with sufficient detail to allow an assessment of materiality and direction of impact. <table border="1"> <thead> <tr> <th>Item where different from ICS calibration</th> <th>Reasons and adjustments when providing data using same calibration as ICS</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Item where different from ICS calibration	Reasons and adjustments when providing data using same calibration as ICS	Insert text	Insert text				
Item where different from ICS calibration	Reasons and adjustments when providing data using same calibration as ICS								
Insert text	Insert text								
53	Where you have indicated the results come from a model whose use has been approved by a supervisory authority, please provide details and scope of the approval – has the approval been granted by the group-wide supervisor, a single legal entity supervisor or a supervisory college?								

	Model approved	Details of the approval
	Insert text	Insert text
(Add additional rows as necessary)		
54	Please explain the diversification benefits in worksheet 9.2 <i>Other methods</i> and demonstrate that it is adequate. You may need to provide a short description of the dependency modelling.	
	Difference	Description of difference
	Insert text	Insert text
(Add additional rows as necessary)		
55	Considering the risk profile of your group, is there any area for which the ICS standard method does not appropriately capture the risk profile of your group and for which an internal economic capital modelling approach would be more appropriate?	
	Provide your response by placing an 'x' in the relevant cell:	
	☐ YES	☐ NO
	☐ Not Applicable	
	If YES, please describe why an internal economic capital modelling approach would capture your risk profile more appropriately in the context of a consistent assessment of risk needed for the ICS.	
	Item name	Description and rationale
	Insert text	Insert text
(Add additional rows as necessary)		

9 Self-assessment Template for Internal Models

IAIGs participating in the additional reporting for internal models should complete and submit the self-assessment template, which assesses the degree of compliance with the list of prerequisites.

The scope of application of internal models is limited to the calculation of the ICS capital requirement and not to other areas of the ICS such as capital resources or valuation (eg MAV). Therefore, the development of internal models is meant to introduce only an alternative calculation of the ICS capital requirement, while the valuation of the assets and liabilities of the IAIG would continue to be calculated according to the methods set out by the IAIS. However, the IAIS expects convergence between the valuation basis embedded in the internal model and the valuation basis for the ICS during the monitoring period.

IM1	Do you use a full internal model?								
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If No, please describe which type of partial internal model you use. Please describe in summary, but with sufficient detail to allow an assessment of the perimeter of the internal model. <table border="1"> <thead> <tr> <th>Partial model type</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Partial – One or more risk charges of the ICS standard method capital requirement</td><td>Insert text if this partial model type is used</td></tr> <tr> <td>Partial – One or more sub-risk charges of the ICS standard method capital requirement</td><td>Insert text if this partial model type is used</td></tr> <tr> <td>Partial – One or more risk charges or sub-risk charges not captured by the ICS standard method capital requirement</td><td>Insert text if this partial model type is used</td></tr> </tbody> </table>	Partial model type	Description	Partial – One or more risk charges of the ICS standard method capital requirement	Insert text if this partial model type is used	Partial – One or more sub-risk charges of the ICS standard method capital requirement	Insert text if this partial model type is used	Partial – One or more risk charges or sub-risk charges not captured by the ICS standard method capital requirement	Insert text if this partial model type is used
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Partial – One or more risk charges or sub-risk charges not captured by the ICS standard method capital requirement	Insert text if this partial model type is used								

	Partial –Only one or more major business units or legal entities	Insert text if this partial model type is used																												
	Other model structure	Insert text if this partial model type is used																												
<i>(Add additional rows as necessary)</i>																														
IM2	Do you use the partial internal model for calculation of risk charges in any of the below mentioned risk categories?																													
Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe in summary, how the internal model is used to calculate risk charges in below mentioned risk categories. <table border="1"> <thead> <tr> <th>Risk category</th><th>Description of the usage</th></tr> </thead> <tbody> <tr><td>Mortality risk</td><td></td></tr> <tr><td>Longevity risk</td><td></td></tr> <tr><td>Morbidity/Disability risk</td><td></td></tr> <tr><td>Lapse risk</td><td></td></tr> <tr><td>Expense risk</td><td></td></tr> <tr><td>Premium risk</td><td></td></tr> <tr><td>Claims reserve risk</td><td></td></tr> <tr><td>Catastrophe risk</td><td></td></tr> <tr><td>Interest Rate risk</td><td></td></tr> <tr><td>Non-default Spread risk</td><td></td></tr> <tr><td>Equity risk</td><td></td></tr> <tr><td>Real Estate risk</td><td></td></tr> <tr><td>Currency risk</td><td></td></tr> </tbody> </table>			Risk category	Description of the usage	Mortality risk		Longevity risk		Morbidity/Disability risk		Lapse risk		Expense risk		Premium risk		Claims reserve risk		Catastrophe risk		Interest Rate risk		Non-default Spread risk		Equity risk		Real Estate risk		Currency risk	
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Real Estate risk																														
Currency risk																														

	Asset Concentration risk												
	Credit risk												
	Operational risk												
<i>(Add additional rows as necessary)</i>													
IM3	Do you meet the criteria for validation?												
	Provide your response by placing an 'x' in the relevant cell:												
	☐ YES	☐ NO ☐ Not Applicable											
	If Yes, please describe the validation process of the internal model.												
	If No, please describe the shortcomings and whether changes are planned.												
	<table border="1"> <thead> <tr> <th>Description item</th><th>Description rationale</th><th>Yes/No</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> </tbody> </table>		Description item	Description rationale	Yes/No	Insert text	Insert text						
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Insert text	Insert text												
<i>(Add additional rows as necessary)</i>													
IM4	Do you meet the criteria for statistical quality tests?												
	Provide your response by placing an 'x' in the relevant cell:												
	☐ YES	☐ NO ☐ Not Applicable											
	If YES, please describe in summary on how statistical quality tests are used in the internal model.												
	If No, please describe the shortcomings and whether changes are planned.												
	<table border="1"> <thead> <tr> <th>Comment name</th><th>Comment description</th><th>Yes/No</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> </tbody> </table>		Comment name	Comment description	Yes/No	Insert text	Insert text						
Comment name	Comment description	Yes/No											
Insert text	Insert text												

	(Add additional rows as necessary)												
IM5	Do you meet the criteria for calibration tests?												
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe in summary on how calibration tests are used in the internal model. If No, please describe the shortcomings and whether changes are planned. <table border="1"> <thead> <tr> <th>Statistical quality test</th><th>Description of the test</th><th>Yes/No</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> </tbody> </table> (Add additional rows as necessary)	Statistical quality test	Description of the test	Yes/No	Insert text	Insert text							
Statistical quality test	Description of the test	Yes/No											
Insert text	Insert text												
IM6	Do you meet the criteria for the use test?												
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable Please describe in summary the areas where expert judgement is predominantly used. <table border="1"> <tbody> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> </tbody> </table> (Add additional rows as necessary)												
IM7	Are the criteria for the use test met?												

Provide your response by placing an 'x' in the relevant cell:

☐

YES

☐

NO

☐

Not Applicable

If YES, please describe in summary, how the use test is met.

If No, please describe the shortcomings and whether changes are planned.

Use test	Description	Yes/No
Business planning	Insert text	
Mergers and Acquisitions		
Reinsurance		
Investment		
Underwriting		
Risk Management		
Capital Management (assessment and allocation)		
Performance Management		

(Add additional rows as necessary)

IM8

Are the criteria for model governance met?

Provide your response by placing an 'x' in the relevant cell:

☐

YES

☐

NO

☐

Not Applicable

If YES, please describe in summary the model governance and internal controls at different stages of the model.

If No, please describe the shortcomings and whether changes are planned.

Model stage	Description	Yes/No
Model development	Insert text	
Model deployment		
Model implementation		
Model usage		
Model validation		
Model changes		
Data quality		
Use test checking		
Roles and relationships of		

IM9 Are the criteria for the documentation standards met?

Provide your response by placing an 'x' in the relevant cell:

☐ YES
 ☐ NO
 ☐ Not Applicable

If YES, please describe in summary how the standards are met.

If No, please describe the shortcomings and whether changes are planned.

Documentation type	Description	Yes/No
Insert text	Insert text	

(Add additional rows as necessary)

IM10 Please describe the model documentation process at different stages of the model.

Model stage	Description
Model development	Insert text
Model deployment	
Model implementation	
Model usage	
Model validation	
Model changes	
Data quality	
Use test checking	
Roles and relationships of units responsible for documentation	

(Add additional rows as necessary)



10 Economic impact assessment

As part of the agreement for the ICS to enter the monitoring period, the IAIS committed¹ to producing an Economic Impact Assessment of the ICS ahead of its implementation as a Prescribed Capital Requirement (PCR) in 2025.

The purpose of the assessment is to develop an understanding of any potential significant effects of implementation of the ICS, which could be positive or negative. The assessment will consider issues across different regions and could cover a broad range of potential impacts, such as those that might affect the market operations of insurers, the financial markets or the availability of insurance products.

Impact on product availability

One of the main concerns expressed during discussions with Members and stakeholders is the potential for the ICS to have a negative impact on the functioning of insurance markets and restrict the availability of certain types of long-term insurance products in certain regions or markets.

EIA1	Do you foresee the implementation of the ICS having an impact on the long-term strategy of your business?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe in sufficient detail the key areas of your strategy that might affected. <table border="1"> <thead> <tr> <th>Impact</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				
EIA 2	Do you foresee the implementation of the ICS having an impact on your new business strategy?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable				

¹ . Explanatory Note on the ICS and Comparability Assessment 14 November 2019. [191120-Explanatory-Note-on-the-ICS.pdf \(iaisweb.org\)](#)

	If YES, please describe in sufficient detail the key areas of your new business strategy that might affected. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 15%;">Impact</th><th>Description</th></tr> <tr> <td>Insert text</td><td>Insert text</td></tr> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				
EIA 3	Do you foresee the introduction of the ICS having a significant impact on the pricing of products?				
	Provide your response by placing an 'x' in the relevant cell: <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> YES <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> NO <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> Not Applicable If YES, please describe those impacts in sufficient detail. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 15%;">Impact</th><th>Description</th></tr> <tr> <td>Insert text</td><td>Insert text</td></tr> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				
EIA 4	Do you foresee the introduction of the ICS having a significant impact on the range of product features available in the market (for example investment guarantees)?				
	Provide your response by placing an 'x' in the relevant cell: <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> YES <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> NO <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> Not Applicable If YES, please describe those impacts in sufficient detail. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 15%;">Impact</th><th>Description</th></tr> <tr> <td>Insert text</td><td>Insert text</td></tr> </table>	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				

	(Add additional rows as necessary)				
EIA 5	Do you foresee the introduction of the ICS having a significant impact on the duration of products written (eg offering products with shorter-term guarantees)?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe those impacts in sufficient detail. <table border="1"> <thead> <tr> <th>Impact</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td></tr> </tbody> </table> (Add additional rows as necessary)	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				
EIA 6	Do you foresee the introduction of the ICS resulting in your withdrawal from writing specific types of products?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe in sufficient detail. <table border="1"> <thead> <tr> <th>Impact</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td>Insert text</td></tr> </tbody> </table> (Add additional rows as necessary)	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				
EIA 7	Do you foresee the implementation of the ICS requiring changes to your risk appetite or your approach to risk mitigation?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable				

	If YES, please describe those changes in sufficient detail. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 25%;">Impact</th><th>Description</th></tr> <tr> <td>Insert text</td><td></td></tr> <tr> <td></td><td></td></tr> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text			
Impact	Description						
Insert text							
EIA 8	Do you foresee any circumstances in which the introduction of the ICS might create or help resolve protection gaps in your region (eg due to reduced product availability)?						
	Provide your response by placing an 'x' in the relevant cell: <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> YES <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> NO <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> Not Applicable If YES, please describe the impacts in sufficient detail. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 25%;">Impact</th><th>Description</th></tr> <tr> <td>Insert text</td><td></td></tr> <tr> <td></td><td></td></tr> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text			
Impact	Description						
Insert text							
EIA 9	Would you expect any reduction in your product availability to be filled by other market participants?						
	Provide your response by placing an 'x' in the relevant cell: <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> YES <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> NO <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> Not Applicable Please describe in sufficient detail any impacts on product availability in your region. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 25%;">Impact</th><th>Description</th></tr> <tr> <td>Insert text</td><td></td></tr> <tr> <td></td><td></td></tr> </table>	Impact	Description	Insert text			
Impact	Description						
Insert text							



	(Add additional rows as necessary)
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Impact on insurers' business models

The ICS is not intended to result in an increase in overall capital requirements however the implementation of the ICS might result in changes to the capital position and risk sensitivity for some IAIG's. This could result in changes to an IAIG's business model and impact the profitability of some of its products, business units, or legal entities.

EIA 10	Do you anticipate that the implementation of the ICS could lead to a significant change in your solvency position? Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe those changes in sufficient detail. <table border="1"> <thead> <tr> <th>Impact</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> </tbody> </table> (Add additional rows as necessary)	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				
EIA 11	Do you anticipate that the implementation of the ICS could lead to a significant change in the risk sensitivity of your solvency position? Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe those changes in sufficient detail. <table border="1"> <thead> <tr> <th>Impact</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> </tbody> </table> (Add additional rows as necessary)	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				

EIA 12	Do you anticipate that the implementation of the ICS could lead to a significant change in the profitability of any business units or entities within your business?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe the drivers of profitability that might be affected in sufficient detail. <table border="1"> <thead> <tr> <th>Impact</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				
EIA 13	Do you anticipate circumstances in which you would need to raise additional capital (beyond your current expectations) as a result of the implementation of the ICS?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe those key factors that are most likely to cause you to raise additional capital in sufficient detail. <table border="1"> <thead> <tr> <th>Impact</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				
EIA 14	Do you have any concerns over your ability to raise capital or issue debt in the future as a result of the implementation of the ICS?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable				

	If YES, please describe the key factors affecting your ability to raise capital or issue debt in sufficient detail. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 20%;">Impact</th><th>Description</th></tr> <tr> <td>Insert text</td><td>Insert text</td></tr> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text	Insert text		
Impact	Description						
Insert text	Insert text						
EIA 15	Do you foresee any circumstances in which you might significantly change to your risk management strategy as a result of the introduction of the ICS?						
	Provide your response by placing an 'x' in the relevant cell: <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> YES <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> NO <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> Not Applicable If YES, please describe those changes in sufficient detail. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 20%;">Impact</th><th>Description</th></tr> <tr> <td>Insert text</td><td></td></tr> <tr> <td></td><td></td></tr> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text			
Impact	Description						
Insert text							
EIA 16	Do you foresee any circumstances in which you might significantly change your approach to risk mitigation as a result of the introduction of the ICS?						
	Provide your response by placing an 'x' in the relevant cell: <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> YES <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> NO <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> Not Applicable If YES, please describe those key factors in sufficient detail. For example would you expect to increase your use of derivatives or other hedging strategies? <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 20%;">Impact</th><th>Description</th></tr> <tr> <td>Insert text</td><td></td></tr> </table>	Impact	Description	Insert text			
Impact	Description						
Insert text							

	<table border="1"> <tr> <td></td> <td></td> </tr> </table> (Add additional rows as necessary)						
EIA 17	Do you foresee circumstances in which you might significantly change your investment strategy as result of the implementation of the ICS?						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe those changes in sufficient detail. <table border="1"> <thead> <tr> <th>Impact</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table> (Add additional rows as necessary)	Impact	Description	Insert text			
Impact	Description						
Insert text							
EIA 18	Do you foresee circumstances in which you might significantly change your group structure as a result of the introduction of the ICS?						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe those changes in sufficient detail. <table border="1"> <thead> <tr> <th>Impact</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table> (Add additional rows as necessary)	Impact	Description	Insert text			
Impact	Description						
Insert text							
EIA 19	Do you foresee any other changes to your operating model as a result of the introduction of the ICS?						
	Provide your response by placing an 'x' in the relevant cell:						

	☐ YES ☐ NO ☐ Not Applicable						
	If YES, please describe those changes in sufficient detail. <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 25%;">Impact</th> <th>Description</th> </tr> <tr> <td>Insert text</td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text			
Impact	Description						
Insert text							
EIA 20	Do you foresee any significant improvements in your ability to manage risk as a result of the introduction of the ICS?						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable						
	If YES, please describe those improvements in sufficient detail. <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 25%;">Impact</th> <th>Description</th> </tr> <tr> <td>Insert text</td> <td></td> </tr> <tr> <td></td> <td></td> </tr> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text			
Impact	Description						
Insert text							
EIA 21	Do you foresee any significant benefits to your business as a result of the introduction of the ICS?						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable						
	If YES, please describe those benefits in sufficient detail. <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 25%;">Impact</th> <th>Description</th> </tr> </table>	Impact	Description				
Impact	Description						

	Insert text	
(Add additional rows as necessary)		

Impact on financial markets

An area of concern raised by both member and stakeholders is the potential impact of the ICS on investment markets and the ICS being a driver of pro-cyclicality in broader financial markets. The risk to be assessed is whether the ICS might lead to convergence of investment strategies of IAIGs to a limited pool of assets whose prices movements might then be magnified under specific investment conditions. The concern is that this concentration of exposure has the potential to lead some pro-cyclicality in the broader financial markets.

EIA 22	Do you foresee potential for changes in investment strategy across the insurance industry which lead to greater pro-cyclical behaviour, as a result of the implementation of the ICS?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe those key factors that could drive this behaviour in sufficient detail. <table border="1"> <thead> <tr> <th>Impact</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Insert text</td> <td>Insert text</td> </tr> </tbody> </table> (Add additional rows as necessary)	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				
EIA 23	Do you foresee the implementation of the ICS having an impact on asset concentration risk, either within your own business or across insurance markets in your region?				
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please provide a description of the circumstances in which this might occur <table border="1"> <thead> <tr> <th>Impact</th> <th>Description</th> </tr> </thead> <tbody> </tbody> </table>	Impact	Description		
Impact	Description				

	<table border="1"> <tr> <td>Insert text</td><td>Insert text</td></tr> </table> (Add additional rows as necessary)	Insert text	Insert text				
Insert text	Insert text						
EIA 24	Do you foresee the implementation of the ICS significantly altering your investment strategy or investment decisions in response to stressed market conditions? Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe the circumstances in which this might occur. <table border="1"> <tr> <th>Impact</th><th>Description</th></tr> <tr> <td>Insert text</td><td>Insert text</td></tr> </table> (Add additional rows as necessary)	Impact	Description	Insert text	Insert text		
Impact	Description						
Insert text	Insert text						
EIA 25	Do you foresee the implementation of the ICS resulting in a significant change in the demand for specific asset classes (eg AAA / BBB rated corporate or government bonds, equities) across the insurance market? Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe in sufficient detail the potential impact of each affected asset class. <table border="1"> <tr> <th>Asset class</th><th>Description</th></tr> <tr> <td>Insert text</td><td></td></tr> <tr> <td></td><td></td></tr> </table> (Add additional rows as necessary)	Asset class	Description	Insert text			
Asset class	Description						
Insert text							
EIA 26	Are there any other areas of the financial markets (eg derivatives or securitisations) that might be impacted – directly or indirectly – by the implementation of the ICS?						

	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe the specific area of the markets and how it might be impacted. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="width: 25%;">Impact</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td></td></tr> <tr> <td></td><td></td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text			
Impact	Description						
Insert text							
EIA 27	Do you have any concerns over the availability of longer-term assets in the market to meet your requirements as a result of the introduction of the ICS?						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please describe the specific asset types affected and any specific financial conditions where this might become a concern. <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="width: 25%;">Impact</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td></td></tr> <tr> <td></td><td></td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text			
Impact	Description						
Insert text							
EIA 28	Do you foresee any increased risk to the broader financial markets (eg from significant re-allocations into or out of specific asset classes in response to shocks in financial markets) as a result of the implementation of the ICS?						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable						

	If YES, please describe those risks in sufficient detail. <table border="1" data-bbox="304 353 1362 566"> <thead> <tr> <th data-bbox="304 353 576 421">Asset Class</th><th data-bbox="576 353 1362 421">Description</th></tr> </thead> <tbody> <tr> <td data-bbox="304 421 576 495">Insert text</td><td data-bbox="576 421 1362 495"></td></tr> <tr> <td data-bbox="304 495 576 566"></td><td data-bbox="576 495 1362 566"></td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Asset Class	Description	Insert text			
Asset Class	Description						
Insert text							
EIA 29	Do you foresee any benefits to the insurance market as a result of the implementation of the ICS?						
	Provide your response by placing an 'x' in the relevant cell: <input data-bbox="304 813 363 887" type="checkbox"/> YES <input data-bbox="552 813 611 887" type="checkbox"/> NO <input data-bbox="799 813 858 887" type="checkbox"/> Not Applicable If YES, please describe those benefits in sufficient detail. <table border="1" data-bbox="304 1061 1362 1274"> <thead> <tr> <th data-bbox="304 1061 576 1128">Benefit</th><th data-bbox="576 1061 1362 1128">Description</th></tr> </thead> <tbody> <tr> <td data-bbox="304 1128 576 1202">Insert text</td><td data-bbox="576 1128 1362 1202"></td></tr> <tr> <td data-bbox="304 1202 576 1274"></td><td data-bbox="576 1202 1362 1274"></td></tr> </tbody> </table> <i>(Add additional rows as necessary)</i>	Benefit	Description	Insert text			
Benefit	Description						
Insert text							

Implementing the ICS

The process to implement the ICS will vary significantly between insurers and supervisors and across regions due to the different local circumstances. The nature of the implementation, including the timing and use of transitional measures will impact the direct and indirect costs of implementation. At this stage of development of the ICS, it will be difficult to estimate the specific costs of the implementation of the ICS. However, we would like to understand what aspects of your business might be involved the implementation process and any issues you foresee with this process.

EIA 30	To the extent that it can be predicted, do you foresee having to devote significant resources to implement the requirements of the ICS within your business?
	Provide your response by placing an 'x' in the relevant cell: <input data-bbox="304 1899 363 1973" type="checkbox"/> YES <input data-bbox="552 1899 611 1973" type="checkbox"/> NO <input data-bbox="799 1899 858 1973" type="checkbox"/> Not Applicable

	If YES, please provide a description of the areas of your business most likely to be affected (eg IT, actuarial, pricing). <table border="1"> <tr> <th data-bbox="304 409 456 512">Business area</th><th data-bbox="456 409 1362 512">Description</th></tr> <tr> <td data-bbox="304 512 456 620">Insert text</td><td data-bbox="456 512 1362 620">Insert text</td></tr> </table> <i>(Add additional rows as necessary)</i>	Business area	Description	Insert text	Insert text
Business area	Description				
Insert text	Insert text				
EIA 31	To the extent that it can be predicted, do you foresee significant impediments to implementing the requirements of the ICS within your business?				
	Provide your response by placing an 'x' in the relevant cell: <input data-bbox="304 869 363 943" type="checkbox"/> YES <input data-bbox="552 869 611 943" type="checkbox"/> NO <input data-bbox="799 869 858 943" type="checkbox"/> Not Applicable If YES, please provide a description of issues that might be encountered. <table border="1"> <tr> <th data-bbox="304 1061 456 1133">Impact</th><th data-bbox="456 1061 1362 1133">Description</th></tr> <tr> <td data-bbox="304 1133 456 1240">Insert text</td><td data-bbox="456 1133 1362 1240">Insert text</td></tr> </table> <i>(Add additional rows as necessary)</i>	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				
EIA 32	Would the costs of implementing the ICS be absorbed by, or shared with, other implementation projects running concurrently (eg IFRS 17)?				
	Provide your response by placing an 'x' in the relevant cell: <input data-bbox="304 1487 363 1561" type="checkbox"/> YES <input data-bbox="552 1487 611 1561" type="checkbox"/> NO <input data-bbox="799 1487 858 1561" type="checkbox"/> Not Applicable If YES, please provide information on the specific projects and which type of costs could be shared. <table border="1"> <tr> <th data-bbox="304 1771 456 1843">Impact</th><th data-bbox="456 1771 1362 1843">Description</th></tr> <tr> <td data-bbox="304 1843 456 1944">Insert text</td><td data-bbox="456 1843 1362 1944">Insert text</td></tr> </table>	Impact	Description	Insert text	Insert text
Impact	Description				
Insert text	Insert text				

	(Add additional rows as necessary)						
EIA 33	Do you foresee any other impacts from the implementation of the ICS, not covered above?						
	Provide your response by placing an 'x' in the relevant cell: ☐ YES ☐ NO ☐ Not Applicable If YES, please provide information in sufficient detail <table border="1"> <thead> <tr> <th>Impact</th><th>Description</th></tr> </thead> <tbody> <tr> <td>Insert text</td><td></td></tr> <tr> <td></td><td></td></tr> </tbody> </table> (Add additional rows as necessary)	Impact	Description	Insert text			
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