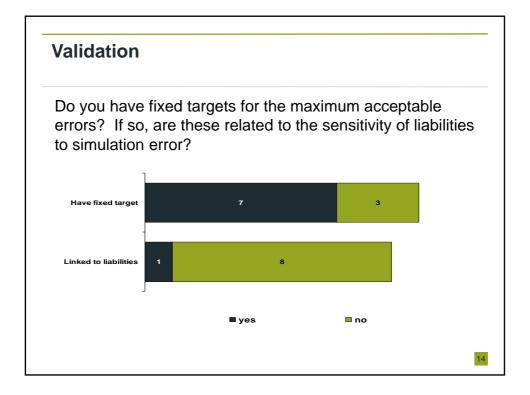
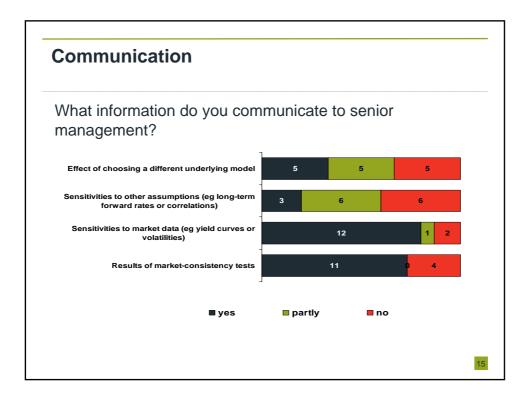
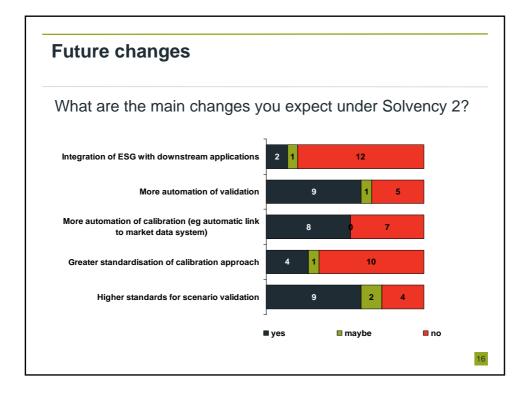
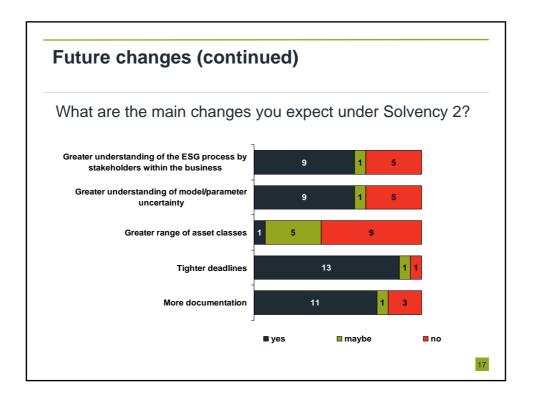


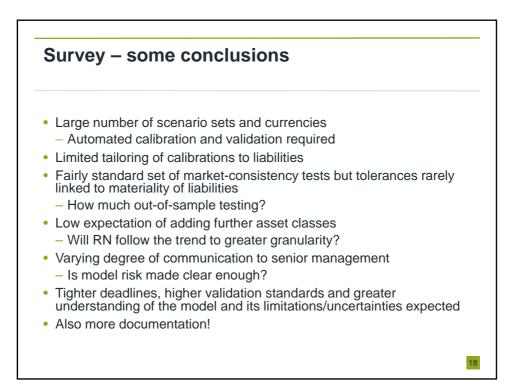
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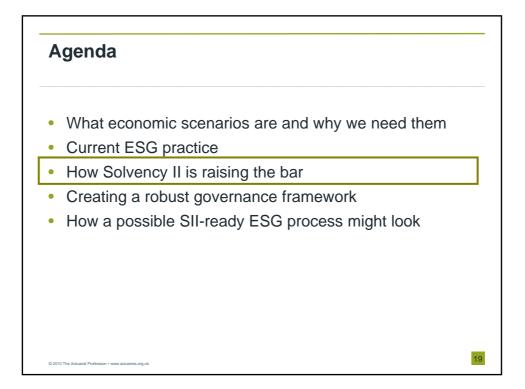


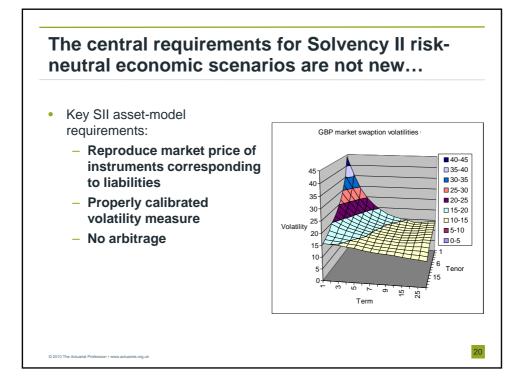




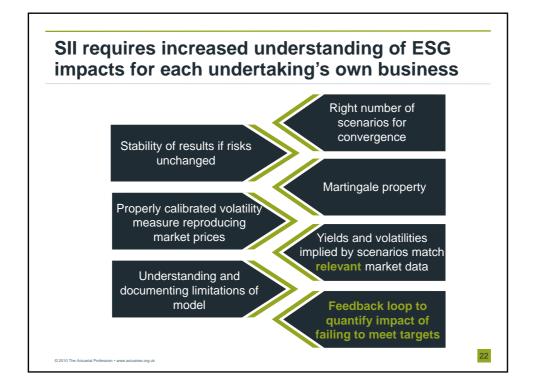


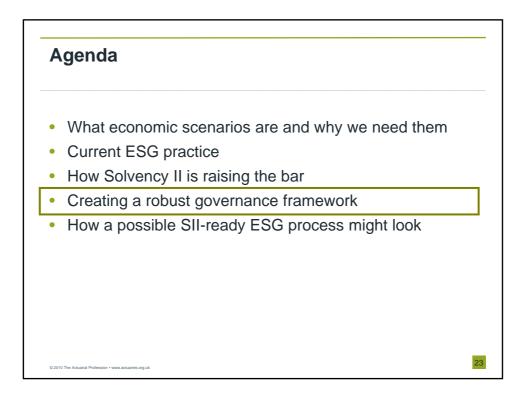


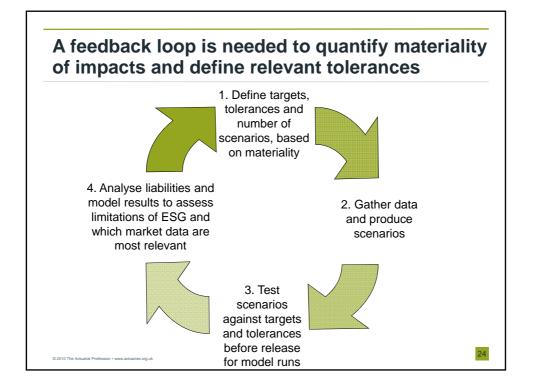


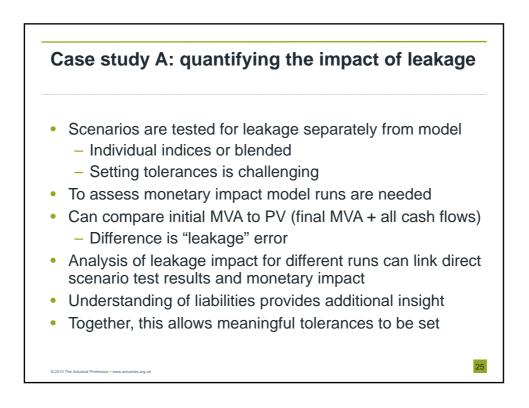


	nd ESGs are raising the bar
Framework directive item	Main requirements for ESG processes
Use test	 Senior management understanding of mode and its limitations Model covers sufficient risks
Statistical quality standard	 Accurate, complete and appropriate data Consistency of assumptions Stability if risks have not changed
Documentation standard	 Models and assumptions shall be documented, including design, rationale, sensitivities and limitations
Validation standard	Testing that requirements above are met





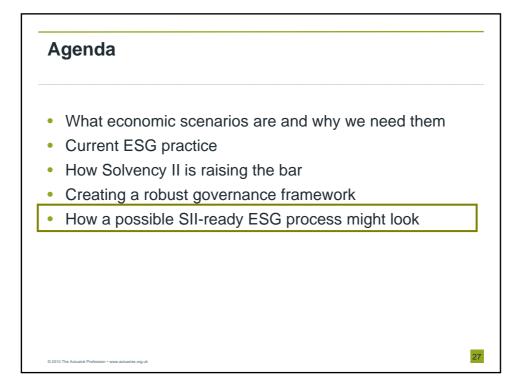




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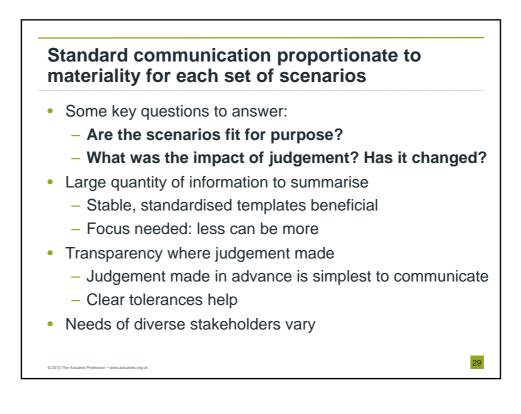


- Replicating the full swaption volatility surface is difficult
 - Sensitivity analysis offers a high-level view of impact
 - Challenging to understand impact of individual points
- Can eliminate error "on average"
 - Impact of errors depends on run-off patterns of guarantees + dynamic policyholder/management actions
- Robust replicating portfolios could give approximate impact
 - Set tolerances
 - Communicate limitations of the model
 - Set weights for averaging



A potential industrialised ESG process under SII made relevant to liabilities by assessment of impacts

Timing	Action
Between runs	 Analyze model results to validate tolerances and methodology for leakage, simulation error and impact estimation Analyze model results / liabilities / proxy representation to validate tolerances and methodology for fit to market data Implement and test updates to methodology
Day –7	Management sign-off of tools, documentation and all non-market inputs
Day 1	 Gather + check market data Overnight automated calibration + generation of base scenarios
Day 2	 Management review and sign-off automated analysis of validation and estimated impact of deviation from targets for base Overnight automated calibration + generation of sensitivity scenarios
Day 3	 Management review and sign-off automated analysis of validation and estimated impact of deviation from targets for sensitivities
When results available	 Impact estimation of leakage, simulation error and failure to fit market data summarized and communicated with run results for base and each sensitivity allowing for any bias removal
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A potential ESG documentation framework under SII giving transparency around accuracy of models

Document	Key contents
Methodology document	 High-level outline of models including rationale and limitations / impact of model choice Reference might be made where relevant to material provided by external providers How scenarios should be used
Data and assumptions manual	 Sources for market data and other assumptions Checks to be applied Estimated sensitivities to most material inputs
Process manual	 Overview of process Checklist for review Step by step description of automated processes and any manual steps to run them
Audit trail package	 Record of complete set of input assumptions for each set of economic scenarios Sign-offs including review check lists and reasons for acceptance for any deviation from tolerances
Results communication package	 Automated estimation of leakage impact and simulation error confidence interval could be provided for every model run Estimated impact of any failure to fit to market data should also be included though this is per scenario set rather than per run Allowance should be made for any bias removal applied
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