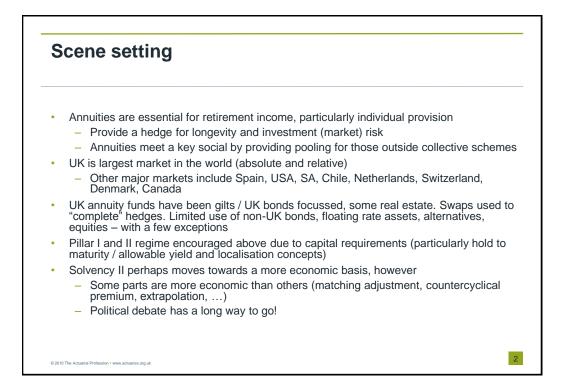
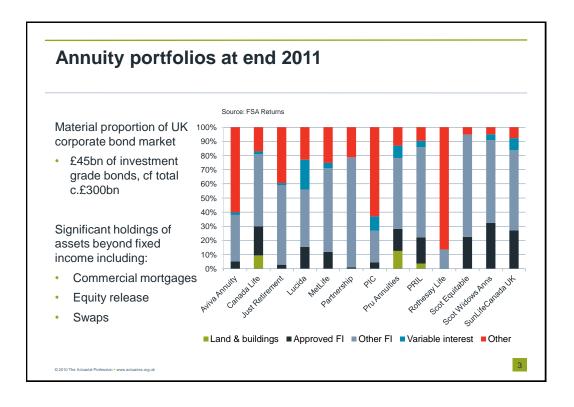
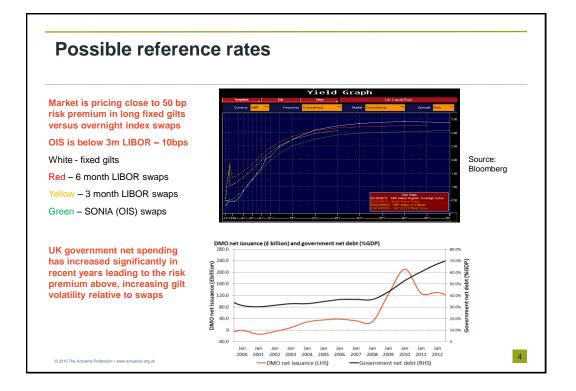


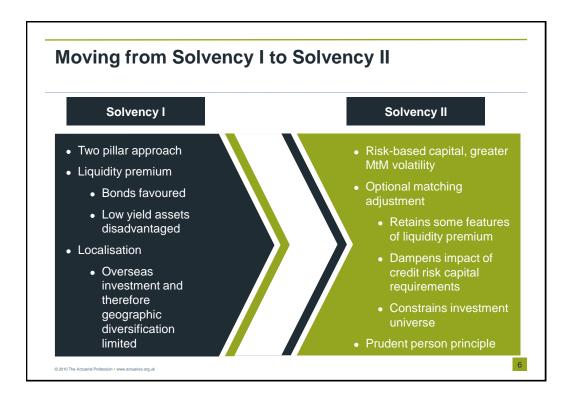
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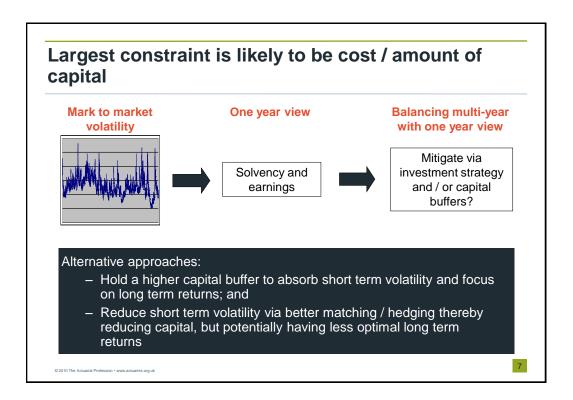




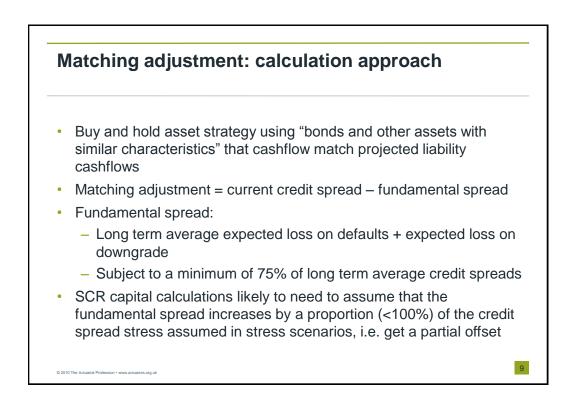


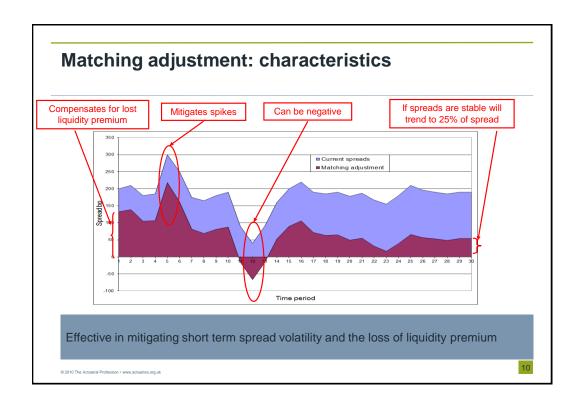






Item Comments Risk free rate Currently still based on LIBOR swaps – central clearing and move to OIS (SONIA) discounting on derivatives (eg cash-collateralised swaps) could cause mismatch risk. Extrapolation: still assumed to be 50y for GBP so less of
and move to OIS (SONIA) discounting on derivatives (eg cash-collateralised swaps) could cause mismatch risk.
Extrapolation: still assumed to be 50y for GBP so less of
an issue than EUR where 20y cutoff proposed.
Transitional period of 7 years blending from old to new discount rate.
Matching adjustment Latest trialogue failed to reach agreement. Expected to survive in some form but details vary between proposals.
Scope of application may widen.
Countercyclical premium (adapted risk free rate) Expected to survive in some form. Industry is pressing for formulaic approach rather than EIOPA discretion.
May only apply to liabilities with duration longer than 7y.
Symmetric adjustment Not in latest proposals.





Requirement	Implications
Assets closely replicate the liability cash flow profile in terms of nature, term and currency	Could significantly change how annuity asset portfolios are managed and reduce attractiveness of certain asset types
	Could limit investment in assets denominated in foreign currencies, unless FX hedging allowed
Assets ring-fenced/assigned and separately managed	Potentially more expensive to manage
Contractual asset cash flows need to be fixed (except for a dependence on inflation) and not capable of change by issuers or third parties	Most non-bond assets currently used fail strict interpretation (swaps, mortgages, property) and some bonds also fail (eg callable)
No assets below "adequate credit quality", at least investment grade, limit on % in BBB (10%/50% have been proposed)	10% would be restrictive What happens on downgrade? Unrated assets?

