

The Unhedgeables

Dr. Robin Thompson, NWM Alistair Russell, Phoenix Andrew Kenyon FIA, NWM



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Market Risk | EIOPA Consultation

- Don't link CoC to IG credit spreads should reflect equity & non-senior debt
- CoC should be **higher** than 6%
- No justification for:

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- Adding a rate component
- Varying with rate level
- Capping at 100% SCR
- Scaling through time
- Market risk should be included but...

$$RM = CoC \sum_{i} SCR_i \, . \, df_i$$





































