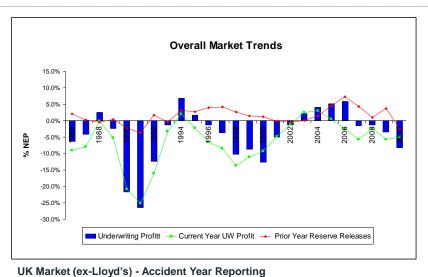


A Little Research

- "...causes of reserve deterioration:
- 'Company' actuaries thought that the most important reasons were companies deliberately booking amounts different from the actuarial best estimates...
- 'London Market' actuaries saw the main reasons for reserve movements as actuarial best estimates being 'insufficiently robust', for example being overly influenced by underwriters..."
- "There is overwhelming pressure towards improved controls over, and documentation of, the reserving process..."
- "Where significant judgements have to be made, the actuary should usually look for evidence beyond discussion with underwriters, particularly where these are reducing reserves in a soft market."

[&]quot;A Change Agenda for Reserving", March 2006 GRIT





on market (ex-zioya 3) - Accident Tear Reporting

Reserve Governance Reviews

- Largely a 1Q2011 exercise reflecting "more intensive and intrusive" supervision strategy
- Prompted by crystallised risks
 - what is the current state of practices?
 - what issues are firms dealing with?
- A series of visits to a sample of insurance firms
 - looking at governance processes
 - how do we get from premium, claims and business system data to booked reserves?
 - what qualitative information feeds into process?
- Visits have led to some RMP (Risk Mitigation Plan) points

Reviews - Some Observations

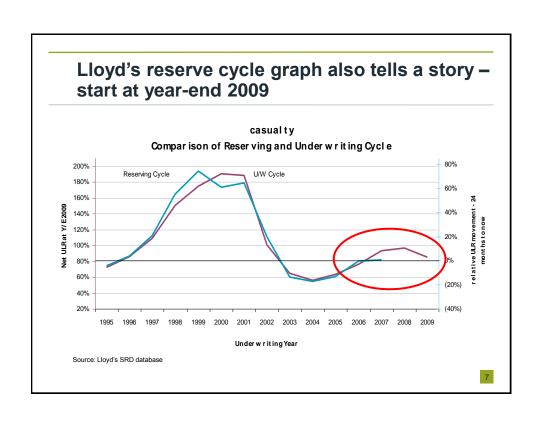
- Prevalence of companies having two numbers
 - Best Estimate" → the actuarial number
 - "Booked Amount" → (higher) firm number
- Does this split view undermine focus?
 - is this efficient use of resources?
 - is this confusing to actuaries as to their role?
- Complex communication processes may increase risk
 - beware lots of ad-hoc meetings
 - observed inverse relationship between number of meetings and quality / quantity of documentation
- Documentation quality falls short of Solvency II expectations
 - claimed compliance with GN12, not convincing

Dear CEO Letter

- Prompted by concerns at state of environment, crystallised risk and some observed practices
- A reminder as to senior management responsibilities
 - must have proper understanding of, and be able to explain, their risk appetite and the consequences of that risk appetite in setting reserves
- Raising awareness of potential pressure on reserving function and that pressure's influence on decision making
- Processes need to: be considered and proportionate; be robust and subject to adequate internal challenge; capture the risks associated with an increasingly challenging claims environment

Future Plans

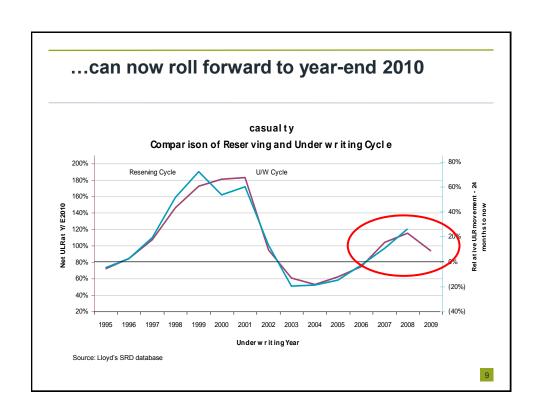
- Will reflect on findings of the reserve governance reviews
- May repeat exercise across a larger sample of firms
- May use Skilled Persons Reports
 - under Section 166 of Financial Services and Markets Act 2000
 - to gather information or seek validation
 - cost will be borne by firm
 - elsewhere
 - used if identified weaknesses not rectified to the FSA's satisfaction
 - review & make recommendations on practices and processes
- Expect more challenge of firms on reserving issues



...we felt it necessary to take actions prior to the 2010 year-end...

- In Dec 2010 Henry Johnson wrote to the CFOs of all Managing Agents before the year-end reserves were set
 - reminded Managing Agents to ensure standards of governance are met
 - includes telling Boards that Lloyd's level of concern exists
 - expecting CFOs to discuss with Boards
- · Signing Actuaries must also play a part
 - Lloyd's ask signing actuaries to explain allowances for reserving cycle
 - for year-end 2010, 91% state the reserving cycle has been considered





Reserving is complex: but are some things actually quite obvious?

- For starters, how many reserve cycle graphs does it take to convince you?
- And we all know "good years get better and bad years get worse"
- This is supported by history
 - can look at movements in Lloyd's "low level" Casualty classes:

| | | Average ULRs | | | % of years that got | |
|--------|------------------|--------------|--------|---------------|---------------------|--------|
| | Years of Account | @ Yr 2 | Latest | Rel. Movement | worse | better |
| "BAD" | 1998-2001 | 115% | 171% | 49% | 94% | |
| "GOOD" | 2003-2006 | 69% | 55% | (20%) | | 79% |

Source: Lloyd's SRD database

Note: 10 low level classes for each year of account. So 80 data points in total



And what about actual claims experience in the early years?

- Actual versus expected analyses are valuable
 - but are we sometimes too quick to dismiss?
- Can consider other simple measures like IBNR burn

| | Years of Account | Average IBNR burn during yr 3 |
|--------|------------------|-------------------------------|
| "BAD" | 1998-2001 | 61% |
| "GOOD" | 2003-2006 | 23% |

All part of Lloyd's regular reserve monitoring exercise

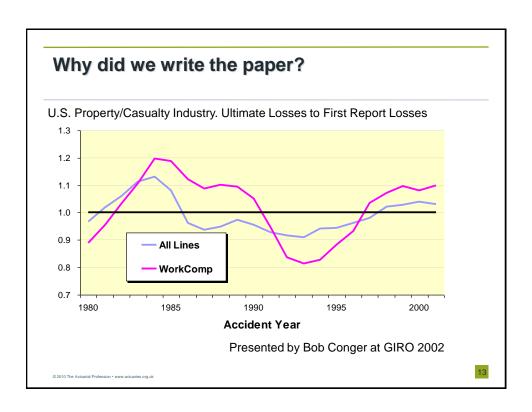
Source: Lloyd's SRD database



Do actuaries have selective sight at times?

- I'm proposing that simple indicators do exist and reliable flags of potential reserving "issues" are available. For example:
 - high initial ULRs
 - high IBNR burns during early years
 - unfavourable Actual vs Expected
- Don't be afraid to use the full history....including the cycle
 "Concern should drive us into action and not into a depression"
 Pythagoras





Why did we write the paper?

- Was there a similar cycle in the UK?
- · What caused it? Actuaries or Directors?
- Soft-market-related reserve deteriorations
- Personal, bitter experience
- Could it be stopped?

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What happened to the paper?

- · GRIT, ROC, Working Parties
- Reading for SA3
- Reserving Cycle (700 hits)
- SAO reports
- Efforts to adapt methods

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What has happened since 2003?

- Hard market ended
- Reserve surpluses persist but are being eroded, fast
- "Cheating Stage" of the cycle
- Personally surprised that the Lloyd's and FSA letters were not sent several years ago

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What do we think now?

- Nobody believes the problem has gone away
- Means and motives remain: Human behaviour, biases, pressures, fear and greed, analysts, investors etc
- It's not just about the cycle other issues can catch you out and cause expensive reserve movements
 - Med Mal
 - Motor
- Understanding the business better
- · The Dunning-Kruger effect
- You're not that smart, and that's really dangerous!

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