

Solvency and Financial Condition Report

Aberdeen Standard Investments Life and Pensions Limited
As at 31 December 2019



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1. Summary

1.1 Business and Performance Summary

Aberdeen Standard Investments Life and Pensions Limited ('ASI Life' or 'the Company') is a UK regulated subsidiary of Standard Life Aberdeen Group (SLA Group). The Company changed its name in 2019 from Aberdeen Asset Management Life and Pensions Limited. In practice it serves as an efficient delivery mechanism for SLA Group's asset management business, Aberdeen Standard Investments (ASI), to deliver investment management services to UK institutional pension scheme clients and other UK insurance entities.

The Company issues unit-linked investment policies (Trustee Investment Plans) to trustees of UK pension schemes and reinsurance policies to insurance companies covering unit-linked pension liabilities.

Key aspects of the contracts written are:

- There are no investment guarantees on the policies. The benefits payable are linked solely to the performance of the internal linked funds.
- The contracts all contain clauses that permit them to be terminated at the option of ASI Life subject to three months' notice. The only charges on policies are fund management charges and there are no penalties on the customer taking a surrender value at any time.
- They include no material insurance risk. The contracts do have annuity options (on non-guaranteed terms), but ASI Life has not written any annuity business and does not expect to do so.
- They permit ASI Life to increase the level of fund charges, subject to a period of notice.
- The contracts include no element of member level administration (for Trustee Investment Plans) or policyholder

- level administration (for reinsurance). The contracts therefore leave ASI Life solely with wholesale management of internal linked funds.

The Company also provides investment management services to UK pension schemes under segregated pension fund management mandates, for which it receives fees accordingly. These services were introduced in 2018.

All business is written in the UK.

The Company's underwriting performance is limited to the excess of fund charges over expenses, which was £2.88m for 2019 (£0.35m for 2018).

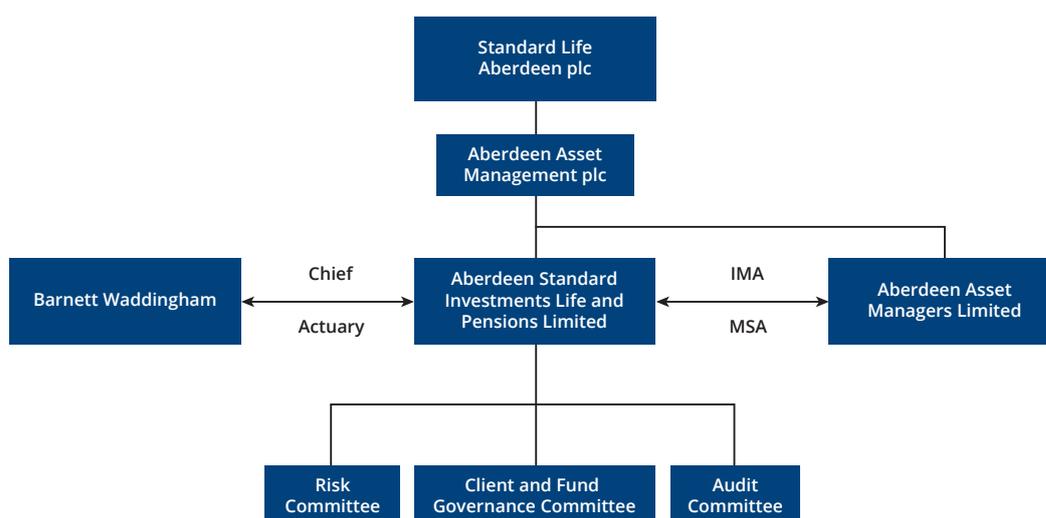
The Company's non-linked assets are prudently invested in cash deposits and a highly liquid short-term money market fund.

1.2 System of Governance Summary

The governance framework of ASI Life is based on the framework which applies to the SLA Group. Additional arrangements have been established by the ASI Life Board (the Board) where necessary to address the requirements of ASI Life as a UK insurance undertaking.

The Company has identified a range of key functions which are provided by Aberdeen Asset Managers Limited (AAML) via a Management Services Agreement (MSA) and an Investment Management Agreement (IMA). Individuals performing key functions are established as fit and proper through a robust framework of initial and ongoing assessment. All remuneration requirements comply fully with the provisions of Solvency II regulations. The Chief Actuary function is outsourced to an individual employed by an external company.

The chart below shows the Company's position within the legal structure of the SLA Group as well as a high level overview of the governance structure which supports the company.



SLA Group operates a 'three lines of defence' risk management model:

- SLA's business lines are responsible for the identification and mitigation of risks and taking the lead with respect to implementing and maintaining appropriate controls.
- Oversight functions within the Risk Division oversee compliance with regulatory and legal requirements as well as monitoring operational, investment and counterparty risk.
- Independent assurance is provided by Internal Audit which recommends improvements to the control environment.

The three lines of defence model is supplemented by a range of risk related committees at divisional and operational business level. The SLA Group Board, executive directors and senior management have overarching responsibility to ensure, through the application of good corporate governance, the effective and strategic stewardship and risk management of the SLA Group.

An integrated risk management system, Shield, is used to identify, assess, track and report risk issues and events. Risk management uses a combination of top down strategic planning with bottom up risk assessment.

The Company carries out an Own Risk and Solvency Assessment (ORSA) annually and more frequently if required. The ORSA process is intended to identify, assess, monitor, manage and report on both short and long term risks and to determine the capital required to ensure that ASI Life can continue to meet its solvency requirements. The ORSA enhances awareness of the risks faced by ASI Life and the capital needed given those risk exposures. This awareness is used by ASI Life as part of its decision making process.

There has been no material change to the governance arrangements of the Company during the reporting period.

1.3 Risk Profile Summary

ASI Life has limited exposure to underwriting risk and market risk. Shareholder assets are managed to limit liquidity risk and operational risk is effectively transferred to AAML as explained in section B.7.

ASI Life has a high tolerance to group risk and, in general, accepts the risk without management, reflecting the rationale for the existence of ASI Life. However, within group risk, ASI Life closely manages AAML's obligations to compensate ASI Life for any operational risk losses. In addition to the contractual protections given in the internal and external outsourcing agreements, ASI Life also considers the capital position and the extent of insurance cover maintained by AAML in determining the ongoing security of the outsourcing arrangement.

Exposure to credit risk is limited by investing non-linked assets in a diverse portfolio of high quality, short term assets. Cash balances are normally limited to £2m exposure to a single counterparty.

1.4 Valuation for Solvency Purposes Summary

ASI Life prepares its financial statements in accordance with UK accounting standards and applicable law (UK Generally Accepted Accounting Practice), including FRS 101 Reduced Disclosure Framework and Schedule 3 of the Companies Act 2006. The valuation for solvency purposes differs only marginally to the financial statements and is discussed in section D.

1.5 Capital Management Summary

The Company aims to maintain sufficient capital out of retained profits to be treated as an entity with credit quality step 1 under Article 199 of the Commission Delegated Regulation (EU) 2015/35 (the Delegated Regulation). The Company does not use any Solvency II transitional measures. At the reporting date the Company's:

- Solvency Capital Requirement (SCR) was £2.10m (2018: £2.73m).
- Minimum Capital Requirement (MCR) was £3.19m (2018: £3.29m).
- Own funds, all of which is "tier 1" capital, were £13.43m (2018: £11.60m).
- Tier 1 capital represented 640% (2018: 425%) of the SCR and 421% (2018: 353%) of the MCR.

The decrease in the SCR reflects the composition of the business in force at 31 December 2019 compared to the previous year-end. The increase in the percentage cover of the SCR reflects the lower SCR together with an increase in own funds due to retained profits. This is explained in sections D and E.

1.6 COVID-19

In early 2020, the existence of a new coronavirus, now known as COVID-19, was confirmed and since this time COVID-19 has spread across China and to a significant number of other countries.

COVID-19 has caused disruption to businesses and economic activity which has been reflected in recent fluctuations in global stock markets. The Company considers the emergence and spread of COVID-19 to be a non-adjusting post balance sheet event.

The Company is working closely with its key outsource providers who, at this point, continue to provide appropriate service levels. The vast majority of UK staff of the fellow group companies who are outsource service providers are working from home and will continue to work from home until further notice. These teams are resourced as necessary with staff who have access to the tools they require to do their jobs from home.

Given the inherent uncertainties, it is not practicable at this time to determine the future impact of COVID-19 on the Company or to provide a quantitative estimate of this impact. At the date of this report, the COVID-19 pandemic has not had a significant impact on the information in this Solvency and Financial Condition Report, and, in particular, the capital surplus of the Company is materially in line with the position at 31 December 2019 as set out in section 1.5.

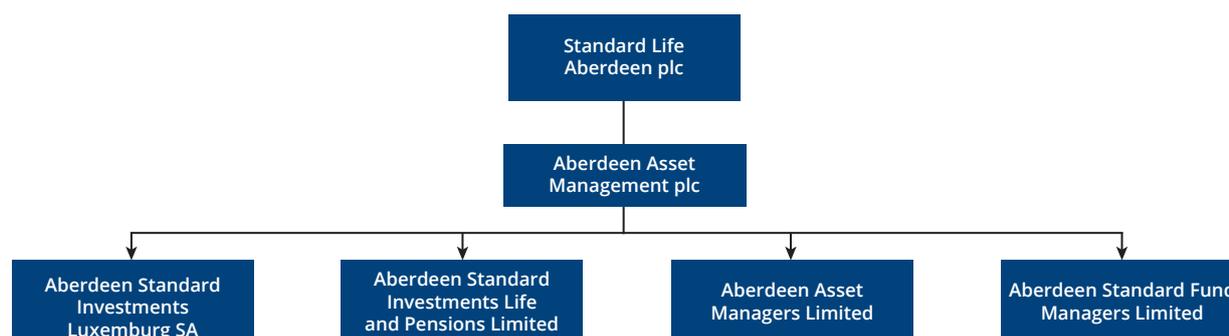
A. Business and Performance

A.1 Business

ASI Life is a private limited company. The Company is a wholly owned subsidiary of Standard Life Aberdeen plc (SLA) and is incorporated and domiciled in England. AAM plc holds all of the ordinary share capital and voting rights in the Company. The ordinary shares of SLA are listed on the London Stock Exchange. Further information on the business of SLA Group is available in the SLA Annual Report and Accounts. The Company is authorised by the Prudential Regulation Authority (PRA), 20 Moorgate, London, EC2R 6DA and regulated by the Financial Conduct Authority (FCA), 25 North Colonnade, London, EH14 5HS and PRA

in the United Kingdom to conduct Classes I (life & annuity), III (linked long term) and VII (pension fund management) of long term insurance business. Financial supervision is undertaken by the PRA. The registered office is Bow Bells House, 1 Bread Street, London EC4M 9HH. The registered number is 03526143. The Company's Auditor is KPMG LLP, Saltire Court, 20 Castle Terrace, Edinburgh, EH1 2EG.

SLA Group supervision is undertaken by the FCA. An extract of organisation structure showing the position of SLA Group companies directly relevant to ASI Life is shown below:



The business of ASI Life consists entirely of contracts with institutional customers for the provision of investment management on a wholesale basis. All business is written in the UK. The services are provided to institutional customers by three contract types:

- Trustee investment plans (TIPs). These are provided to trustees of occupational pension schemes and are classified as unit-linked insurance business, with the investment options being the Company's pooled funds (internal linked funds);
- Reinsurance contracts covering the unit-linked liabilities of third party life assurers. These contracts are structured in a similar way to TIPs and are intended as a means for third-party life assurers with 'open architecture' pension products to access the internal linked funds operated by ASI Life. They are classified as unit-linked reinsurance accepted business.
- Segregated investment mandates (SIMs). These contracts are classified as pension fund management where the Company provides investment management services to pension schemes in respect of their assets. The assets remain the legal property of the scheme and are managed by ASI Life in exchange for investment management fees.

The key characteristics of the TIP and Reinsurance contracts are that:

- There are no investment guarantees on the policies. The benefits payable are linked solely to the performance of the internal linked funds;
- The contracts all contain clauses that permit them to be terminated at the option of ASI Life subject to three months' notice. It should be noted that the only charges on policies are fund management charges and that there are no penalties on the customer taking a surrender value at any time;
- They include no material insurance risk. The contracts do have annuity options (on non-guaranteed terms), but ASI Life has not written any annuity business and does not expect to do so;
- They permit ASI Life to increase the level of fund charges, subject to a period of notice;
- The contracts include no element of member level administration (for TIPs) or policyholder level administration (for reinsurance). The contracts therefore leave ASI Life solely with wholesale management of internal linked funds.

The SIMs have similar characteristics. There is no investment guarantee, insurance risk, charge guarantee or member administration and all contracts can be terminated by ASI Life at three months' notice.

Underwriting performance, year to 31 December 2019 and 31 December 2018

	As at 31 December 2019				As at 31 December 2018			
	SIM £m	Reinsurance accepted £m	TIP £m	Total £m	SIM £m	Reinsurance accepted £m	TIP £m	Total £m
Fee income	5.18	1.22	4.55	10.95	0.83	1.40	4.10	6.33
Performance fee income	0.29	N/A	N/A	0.29	-	N/A	N/A	-
Expenses	4.07	0.90	3.39	8.36	0.79	1.32	3.87	5.98
Underwriting performance	1.40	0.32	1.16	2.88	0.04	0.08	0.23	0.35

A.2 Underwriting Performance

As described in the previous section, the policies written by the Company contain no guaranteed benefits and no investment guarantees. All unit-linked policies are classified as investment contracts for accounting purposes and assets managed under SIM contracts are not included in the financial statements. The underwriting performance is limited to consideration of the excess of fee income over expenses and is shown in the table below. The increase in profit during 2019 reflects the full year impact of Class VII business taken on during 2018 combined with a reduced level of fee share paid to SLA Group subsidiaries as a result of the increase in assets under management.

A.3 Investment Performance

The income and expenses arising from the investments within the internal linked funds are fully offset by an equivalent change in the value of policyholder liabilities. Information on the performance of each internal linked fund is available on ASI's website at <https://www.aberdeenstandard.com/en/uk/institutional/funds-centre/our-life-fund-range>.

The non-linked assets are invested in cash and the ASI Liquidity Fund (Lux) Sterling Fund, a short-term money market fund which provides access to a diversified pool of high credit quality assets as follows:

- Collective Investment Undertakings: ASI Liquidity Fund (Lux) Sterling Fund as at 31 December 2019 £13.15m (2018: £10.26m).
- In the 12 month period ended 31 December 2019 the Company received interest on these assets of £96,344 (2018: £63,923).
- Cash and cash equivalents: Bank deposits as at 31 December 2019 £1.16m (2018: £1.40m).
- There was no income arising from bank deposits.

No material expenses were incurred in respect of the non-linked assets.

ASI Life does not invest directly in any securitisations.

A.4 Performance of Other Activities

The Company has no financial or operating lease arrangements.

The Company had no other material income and expenses in the reporting period.

A.5 Any Other Information

There were no other material events which impacted on the performance of the Company during the reporting period.

B. System of Governance

B.1 General Information on the system of governance

The governance framework for ASI Life is based on the SLA Group framework, with specific arrangements where necessary to address the requirements of ASI Life as a UK insurance undertaking.

Day to day governance and risk control is delegated by ASI Life to AAML via a formal MSA. Investment management is delegated to AAML via a separate IMA. The Board considers the current system of governance appropriate for its business model, which is limited to offering unit-linked pension policies and investment management contracts to trustees of approved UK pension schemes and unit-linked pension reinsurance policies to UK insurance companies.

The Board has established the following two dedicated committees, which receive input from functional committees established by SLA Group as part of its group-wide risk management framework.

Risk Committee

The Risk Committee of ASI Life is responsible for reviewing risk management information relating to the Company. The Committee keeps under review in particular:

- The alignment of the SLA Group's strategy to the risk appetite and policy of the Company's Board.
- Quality of the SLA Group's enterprise risk management framework and operating structure as a mitigation and key control to the Company's risks.
- The extent to which risk assessment is in line with industry best practice and regulatory requirements.

Audit Committee

The Audit Committee of ASI Life monitors the integrity of the financial statements of the Company, reviewing significant financial reporting issues and judgements. The Committee reviews and challenges as appropriate:

- The consistency of, and any changes to accounting policies.
- Whether the Company has followed appropriate accounting standards and made appropriate estimates, assumptions and judgements, taking into account the view of the external auditor and the Chief Actuary.
- The clarity of disclosure in the Company's financial reports.
- The Committee also approves the terms of the external auditor's engagement.

In addition, ASI Life has the following management committee to review the output from activity delegated to AAML under the MSA which has an impact on customer outcomes.

Client and Fund Governance Committee

The Client and Fund Governance Committee (CFGF) of ASI Life assists the Chief Executive Officer in their responsibilities for oversight of any activity which has a direct impact on customer outcomes. This includes, but is not limited to:

- Investment performance.
- Client facing documents and communications.
- Product changes.
- Complaints.

The Committee is also responsible for reviewing decisions around unit dealing and pricing.

During the year the Client and Fund Governance Committee was reconstituted to be an Executive Committee rather than a Board Committee. The CEO is responsible for keeping the Board informed of any relevant matters. There were no other material changes to the governance arrangements of the Company during the reporting period.

Diversity

On an annual basis the SLA Board attests to its compliance with the relevant provisions of the UK Corporate Governance Code issued by the Financial Repot. As part of this the SLA Board approved the following Board Diversity statement.

The SLA Board:

- believes in equal opportunities and supports the principle that due regard should be had for the benefits of diversity, including gender, ethnicity, age and educational and professional background when undertaking a search for candidates, both executive and non-executive;
- recognises that diversity can bring insights and behaviours that may make a valuable contribution to its effectiveness;
- believes that it should have a blend of skills, experience, independence, knowledge and gender amongst its individual members that is appropriate to its needs;
- believes that it should be able to demonstrate with conviction that any new appointee can make a meaningful contribution to its deliberations;
- is committed to maintaining its diverse composition;
- supports the Group Chief Executive's firm commitment to achieve and maintain a diverse workforce, both throughout the Group and within his Executive Team;
- has a zero tolerance approach to unfair treatment or discrimination of any kind, both throughout the Group and in relation to clients, customers and individuals associated with the Group.

The ASI Life Board is subject to the SLA Group governance arrangements in relation to diversity policies in line with the above statement as part of the evolving integrated governance arrangements and the SLA Board Charter, which also includes the terms of reference of the SLA Group Nominations and Governance Committees. Further detail are available at <https://standardlifeaberdeen.com/who-we-are/governance>.

Senior Managers and Certification Regime (SMCR)

On 10 December 2018 the SMCR was extended to Insurers and replaced the Senior Insurance Managers Regime (SIMR) and approved persons regime.

The SMCR consists of 3 parts:

- Senior Managers Regime (SMR), which focuses on individuals who hold key roles or have overall responsibilities for whole areas of relevant firms;
- Certification Regime, which applies to other staff who could pose a risk of significant harm to the firm or any of its customers;
- Conduct Rules, which are high level requirements that hold individuals to account.

ASI Life has implemented SMCR and certified additional individuals who fall into the Certification Regime.

B.1.1 Key Functions

B.1.1.1 Overview

Key functions have been identified as the four mandatory functions required under Solvency II (actuarial, compliance, risk management and internal audit) and any other function that is of specific importance to the sound and prudent management of the Company.

A list of functions delegated to AAML (which may in turn rely on other companies within the SLA Group) is provided in the MSA and the IMA. ASI Life has determined which are considered to be key functions by identifying those which would significantly impact the business commercially or have adverse impact on policyholders should the services fail or not perform effectively. The additional key functions identified are detailed in section B.1.1.2.

All key functions, except the Actuarial Function, are outsourced to AAML. The Actuarial Function is outsourced to Barnett Waddingham LLP. In implementing the outsourcing arrangements, ASI Life recognises the authority of the Key Function Holder (KFH) to carry out the relevant role on its behalf. This authority is supplemented by the scope of responsibilities included in the Company's Management Responsibility Map, and by the ability of any KFH or member of a key function to escalate any relevant matters to the ASI Life Chief Executive or to the Board. Details of the individuals responsible for the key functions (KFHs) are also detailed in the Management Responsibility Map which is reviewed and updated at least quarterly and shows individual responsibilities.

All key function holders are senior managers within the SLA Group and most of them (or their delegates) regularly interact with the ASI Life Board and/or ASI Life Chief Executive and/or attend the ASI Life Board or Risk Committee meetings or the management forums chaired by the ASI Life Chief Executive such as the quarterly service review meeting or the CFGC to report developments in their areas of responsibility.

The terms of the outsourcing agreements are such that each outsourced service provider should maintain sufficient and appropriate resources to carry out the relevant key functions and must inform the Company of any development which may have a material impact on its ability to carry out the outsourced functions and activities effectively and in compliance with applicable laws and regulatory requirements. ASI Life monitors the performance of the outsourcing arrangements and would escalate any actual or perceived resourcing concerns with the appropriate provider to consider any remedial actions necessary. The Company has also appointed individuals on the Board to oversee key functions and recorded this on the Management Responsibility Map. Such individuals may also escalate any relevant matters to the Board and/or within the wider SLA Group.

B.1.1.2 Summary of key functions, key function holders and responsibilities –

Actuarial	Compliance
Chief Actuary <ol style="list-style-type: none"> 1. Provision of the Actuarial Function in accordance with Conditions Governing Business 6. 2. Provision of additional actuarial and consultancy services as requested by ASI Life or as required by UK regulation, legislation or actuarial professional standards and guidance in relation to work that does not strictly fall under the remit of the Actuarial Function. 	Senior Compliance Manager <ol style="list-style-type: none"> 1. Communication of policy developments for ASI Life. 2. Ensuring Group Remuneration policy is compliant with Solvency II. 3. Provision of day to day support to the Chief Executive on SYSC and SMCR requirements. 4. Maintenance of ASI Life policies assigned by the Chief Executive.
Risk management	Internal audit
Chief Risk Officer <ol style="list-style-type: none"> 1. Performance of the ORSA. 2. Responsibility for the firm's obligations in relation to individual conduct rules for training and regulatory reporting. 3. Identification, measurement and reporting of risks across the Company. 4. Signs the ORSA for ASI Life. 5. Setting of Risk Appetite for the delivery of strategy across the Company. 	Group Internal Audit Director <ol style="list-style-type: none"> 1. Provision of internal audit arrangements across the SLA Group. 2. Evaluation of internal control and other aspects of governance for ASI Life.
Investment management	Operations and Outsourcing
Chief Executive Officer of AAML <ol style="list-style-type: none"> 1. Investment management services for ASI Life. 2. Responsible for Managing the firm's assessment and reaction to Climate change risk 	Chief Operating Officer <ol style="list-style-type: none"> 1. All operational matters and outsourcing arrangements (except actuarial) for ASI Life. This also includes oversight of internal suppliers, e.g. AAML. 2. Leadership for the back-office functions including Operations.
Distribution	Finance
Global Head of Distribution <ol style="list-style-type: none"> 1. Leadership of global distribution teams with a focus on co-ordinating global sales channels, further developing the client service model and ensuring that the product strategy is aligned with the group strategy. 2. Development of the UK institutional plans, in which ASI Life is embedded. 3. Ensuring the ASI Life Chief Executive and the Key Function Holder for Finance are kept abreast of strategy and potential impact to the ASI Life business. 	Group Financial Controller <ol style="list-style-type: none"> 1. Production and integrity of the firm's financial information and regulatory reporting. 2. Management of the allocation and maintenance of the firm's capital and liquidity. 3. Maintenance of ASI Life policies assigned by the Chief Executive.
Human resources	
Chief HR Officer <ol style="list-style-type: none"> 1. Development, communication and implementation of People policies. 2. Induction, training and professional development of all persons performing designated senior management functions on behalf of the firm other than members of the governing body and key function holders. 3. Regulatory references. 4. Responsibility for the firm's performance of its obligations under the employee certification regime. 5. Providing support to the ASI Life Chairman for training and development of board members, especially non-executive directors. 6. The development and implementation of Human Resources strategy. 7. Provision of advice and guidance to the Chief Executive, senior managers and Group Remuneration Committee. Works closely with the Chairman of the Group Remuneration Committee. 8. Developing strategies and processes to attract motivate, develop and retain key staff. 	

B.1.2 Remuneration

B.1.2.1 Overview

The SLA Group has an overarching Remuneration Policy that applies to all entities in the SLA Group. ASI Life has reviewed the Group Remuneration Policy and is of the view that it:

- is consistent with Article 275 of the Delegated Regulation;
- is consistent with, and promotes sound and effective risk management;
- does not encourage risk-taking which is inconsistent with the risk profiles or the instruments constituting the internal linked funds;
- does not impair compliance with its duty to act in the best interests of each of the internal linked funds and its shareholder;
- recognises that different remuneration requirements may be applied within the SLA Group and achieves a high degree of consistency between different regimes and allows for day to day arrangements to be controlled at a group level.

The Board delegates decision making for Remuneration matters to the Group Remuneration Committee in accordance with Group Governance arrangements. The Chair of the Group Remuneration Committee holds the Senior Management Function Chair of the Remuneration Committee (SMF7) for the Company. The Board reviews any material changes to Remuneration Policy on an annual basis.

B.1.2.2 How the SLA Group remuneration policy and practices are consistent with and promote sound and effective risk management and do not encourage excessive risk taking

No supplementary pensions or early retirement schemes are in place for board members or KFHs.

SLA Group does not calculate individual awards directly on the basis of annual revenues or profit. Instead proposals are discretionary and based on a number of factors including multi-year performance and non-financial metrics, such as teamwork along with compliance and risk awareness.

Article 275 (2)(c) of the Delegated Regulation requires firms to defer a 'substantial portion of any variable remuneration' for a period of not less than three years. The SLA Group Policy is in line with this as it applies deferral of 75% of variable remuneration for a minimum of three years when variable remuneration reaches pre-defined levels such that a substantial proportion of variable remuneration is deferred. Solvency II also requires ASI Life to ensure that the deferral period is correctly aligned with the nature of the business, its risk and the activities of the employees in question. Taking into account its business model, ASI Life is of the opinion that the SLA Group remuneration deferral arrangements are appropriate.

The following information is publicly available and describe the Group's overarching principles and practice for remuneration <https://www.standardlifeaberdeen.com/who-we-are/remuneration-disclosure>

B.1.3 Payments between ASI Life and SLA Group

ASI Life pays a share of its net revenues to SLA Group for services under the MSA and IMA. ASI Life also makes dividend payments from time to time. No dividend was paid in the reporting period (2018 Enil).

B.2 Fit and Proper Requirements

All individuals performing an FCA or PRA Senior Management Function (SMF) role, KFH role or Certified role must be 'Fit' and 'Proper'.

The assessment of whether a person is 'fit':

- Includes an assessment of the person's professional and formal qualifications, knowledge (including their awareness, and understanding, of all relevant regulatory requirements applying to the business area in which they work, control and manage) and relevant experience within the relevant financial sectors and whether these are adequate to enable sound and prudent management. Typically the requirements include possession of relevant qualifications and sufficient relevant experience within the SLA Group or similar organisations. Information is detailed in a document which is reviewed internally and sent to the relevant regulator as part of the application process;
- Takes account of the respective duties allocated to that person and, where relevant, the asset management, insurance, financial, accounting, actuarial and management skills of the person;
- In the case of board members, takes account of the respective duties allocated to individual members to ensure appropriate diversity of qualifications, knowledge and relevant experience to ensure that the business is managed and overseen in a professional manner;
- Takes into account interview performance against agreed competencies identified for the role.

The assessment of whether a person is 'proper':

- Considers whether they are of good repute and integrity;
- Includes an assessment of that person's honesty and financial soundness based on evidence regarding their character, personal behaviour and business conduct including any criminal, financial and supervisory aspects relevant for the purpose of the assessment;
- Considers whether the person performs his or her key functions in accordance with the relevant conduct standards specified in Insurance – Conduct Standards 3 of the PRA rulebook and COCON of the FCA handbook;
- Considers references received. SLA must take reasonable steps to obtain appropriate references in accordance with PRA rules.

Ongoing competence:

Processes are in place to assess the competence of all employees on a regular basis, as well as to continue to assess employees' training needs. This is mainly done through the Performance Management Process. This process comprises the following four areas:

- Job Description
- Competencies
- Appraisal
- Continuing Professional Development (CPD)

B.3 Risk Management System Including the Own Risk and Solvency Assessment (ORSA)

The Board is responsible for the management and oversight of all risks affecting ASI Life. To achieve this, ASI Life uses a comprehensive risk management framework which has been

established by SLA Group and which the Board considers to be appropriate to ASI Life's business model. The SLA Group risk framework is supplemented by specific additional arrangements established by the Board where necessary to address ASI Life's business model.

B.3.1 Group risk management framework

SLA's approach to effective risk management is predicated on strong risk awareness and risk accountability across all lines of defence in our business. SLA believes this approach will deliver long-term value for clients, customers and shareholders, and protect their interests.

SLA aims to ensure that:

- well informed risk-reward decisions are taken in pursuit of business plan objectives;
- fiduciary responsibilities are prioritised;
- capital is delivered to areas where the most value can be created from the risks taken.

B.3.1.1 Risk culture

SLA seeks to promote a strong risk management culture throughout all of its businesses, including ASI Life, and to encourage values and behaviours that steer how employees conduct their work and the decisions they make. SLA's risk culture is founded on a clear, consistent risk strategy, and designed to support delivery of strategic objectives:

- **Governance** - ensuring the right governance to facilitate the implementation of pre-emptive and proactive risk management decisions and learn from and remedy issues;
- **Awareness** - a group-wide awareness and understanding of the impact of decisions on risk; and
- **People** - ensuring the right people in the right roles, demonstrating the right behaviours with responsibilities clearly defined.

The SLA board members and senior management frequently communicate the importance of a strong risk culture to reinforce these expected values and behaviours and to enhance employee understanding and knowledge of risk.

B.3.1.2 Three lines of defence

SLA operates a 'three lines of defence' model of risk management, with clearly defined roles and responsibilities for individuals and committees:

- **First line** - Day-to-day risk management, including identification and mitigation of risks and maintaining appropriate controls, is delegated from the SLA Board to the SLA Chief Executive and, through a system of delegated authorities and limits, to business managers
- **Second line** - Risk oversight is provided by the SLA Chief Risk Officer and supported by the specialist Risk and Compliance function across Standard Life Aberdeen, as well as through established risk committees such as the group's Enterprise Risk Management Committee (ERMC) and with reporting to the Risk and Capital Committee (RCC). The majority of members of the ERMC are senior first line representatives. Independent oversight is provided by SLA non-executive directors on the RCC.

- **Third line** - Independent verification of the adequacy and effectiveness of the internal risk and control management systems is provided by the internal audit function. This is independent from all other operational functions. It operates subject to supervision and challenge by the SLA Audit Committee.

The three lines of defence model is supplemented by a range of risk related committees at divisional and operational business level. The SLA Board, executive directors and senior management have overarching responsibilities to ensure, through the application of good corporate governance, the effective and strategic stewardship and risk management of the Group.

B.3.1.3 Risk and Control Assessment

Risk assessment is the process of identifying, assessing, controlling and monitoring operational risks that could threaten or stop delivery of our strategic, financial, conduct and operational objectives and plans. Risk definitions are:

- **Conduct Risk** - the risk that, through the Groups culture, strategies, decision making and behaviours, fair outcomes are not delivered to clients;
- **Operational Risk** - the risk of loss or adverse consequences for the business resulting from inadequate or failed internal processes, people or systems, or from external events. This covers cyber risk and operational resilience which is a key control priority for SLA Group in the 2020 Business plan.

The Risk and Control Self-Assessment (RCSA) process is an integral part of the framework and is designed to integrate and co-ordinate risk identification and risk management efforts, and improve the understanding, control and oversight of operational and conduct risks. Assurance is provided through a quarterly risk and control sign off by business managers, which is overseen and challenged by the SLA Risk and Compliance Function. Its aim is to evaluate and ensure that the primary controls within key processes are documented and subject to regular assessment by business owners. It provides senior management with assurance over the effectiveness of the control environment across key business areas. The assessment includes a review of the adequacy of the design of the suite of controls and an assessment of the actual performance of those controls.

B.3.1.4 Risk Events

An operational 'risk event' is a risk that has materialised (i.e. has happened) as a result of a deficiency in the Group's system of internal control or from an external event. It is defined as a specific occurrence that has happened as a result of human error, inadequate or failed internal processes or systems, or an external event that has, or has the potential to, negatively or positively impact our customers, clients, partners, shareholders and employees.

Risk events can occur in any part of the Group and can significantly impact reputation and performance and may cause client, partner, shareholder and/or employee detriment, so must be identified quickly, understood and appropriately responded to. This is important for a number of reasons:

- It enables timely action to minimise the event's impact, preventing further significant problems for the Company, clients, partners, shareholders and employees;
- It demonstrates our responsiveness to clients', partners', shareholders' and employees' concerns and maintains their trust where they are impacted;

- It provides clarity on the level of risk the business is exposed to, both at an individual (each risk event) and aggregate (across all risk events) level and whether this is within or out with risk appetite (amount of risk we are prepared to accept in pursuing our objectives);
- It supports decision-making on where to direct resources to remediate and mitigate control deficiencies; and
- It supports the management of capital, helping to inform what the capital requirements are (both regulatory and economic) and how capital is being utilised.

RCSAs and risk events and issues are recorded and monitored through the SLA risk system, Shield.

B.3.2 Additional ASI Life risk framework

The SLA Group risk framework described above is the primary means of managing ASI Life's operational risks. Any material changes to the ASI Life business model are referred by the Board to the ASI Life Risk Committee for scrutiny, monitoring and oversight to ensure that the Board's decisions are adequately informed.

ASI Life controls Market Risk, Underwriting Risk, Credit Risk and Liquidity Risk through the design of its contracts and selection of non-linked investments. The extent of any such risks are assessed through the ORSA process and any proposed or necessary changes to contract terms or non-linked investments are escalated appropriately and are subject to sign-off by the Board. Other types of risk such as regulatory or legislative change are also assessed as part of the ORSA process. Aggregate risk is monitored through monthly review of key performance indicators including financial metrics and operational effectiveness as well as regulatory breaches and complaints.

The ASI Life Risk Committee has oversight of the Board's overall risk governance process to give clear, explicit and dedicated focus to current and forward-looking aspects of risk exposure. The Risk Committee advises the Board on risk appetite and tolerance, in setting future strategy, taking into account the Board's overall degree of risk aversion and ASI Life's current financial situation. Duties of the Risk Committee, as set out in its Terms of Reference, include ensuring that steps are taken to identify and control risks and providing input and challenge to the ORSA process.

B.3.3 ORSA

The ORSA process is intended to identify, assess, monitor, manage and report on both short and long term risks and to determine the capital required to ensure that ASI Life can continue to meet its solvency requirements at all times.

The ORSA enhances awareness of the risks faced by ASI Life and the capital needed given those risk exposures. This awareness is used by ASI Life as part of its decision making process.

The ORSA process is broken down into a number of stages as follows:

- Review and approval of the ORSA Policy;
- Risk identification, review and assessment;
- Risk modelling methodology and assumption review;
- Determination of the base balance sheet;
- Risk modelling analysis, including assessment of capital requirements and ongoing compliance with solvency requirements;
- ORSA report update;
- ORSA report review, challenge and approval.

A number of stages in the process may be iterative, with feedback loops. For example, the risk modelling methodology and assumption review assessment may lead to changes being required to the ORSA Policy to adequately capture any revised approach.

The Chief Risk Officer is responsible for planning and initiating the annual ORSA cycle, incorporating any regulatory requirements during the period (e.g. operational resilience, including cyber risk, being included) and for ensuring that all other relevant parties are aware of their roles and responsibilities and have committed appropriate time to the process. The Chief Executive and the Chief Actuary are involved in most stages of the ORSA process. Other key contributors are:

- Compliance – involved in the risk identification, review and assessment;
- Finance – involved in determination of the base balance sheet.

The Risk Committee is responsible for providing initial challenge to the results of the ORSA process and the content of the ORSA report and thereafter proposing that the report be submitted for Board approval.

The Board is ultimately responsible for the ORSA Policy and Process. It takes an active role in setting the ORSA Policy and in accepting the results of the process by providing insight on the risks faced by ASI Life and actions that might be taken and, where relevant, by providing challenge to the Policy, process, results of the process or presentation of the results.

The ORSA is used as a key input into business planning and forecasting (where scenario analysis is used to indicate forecast capital requirements under expected and potential strategies) and to inform strategic or material business decisions. In particular, the Board considers potential or necessary actions if the ORSA indicates that ASI Life is failing to meet or may fail to meet its target solvency levels.

In normal circumstances the ORSA process is run on an annual basis. This is considered appropriate given the nature and scale of the business written by ASI Life.

The ORSA process will also be followed outside of the annual cycle should there be a significant unexpected deterioration in own funds, a significant change in the risk profile of the business or an actual or planned strategic event such as the acquisition of business from another insurance entity. The Chief Executive and the Chief Risk Officer will monitor the financial position of ASI Life and internal and external events to identify when an ad-hoc ORSA process might be appropriate. The Board or Risk Committee can propose that the ORSA process be run at any time if there is deemed to be sufficient justification. In any event, the need to perform any ORSA outside of the normal annual cycle must be approved by the Board.

The Company has determined its own solvency needs by using a combination of stress and scenario tests including forward-looking projections that consider the projected solvency position in a central 'best estimate' scenario and a number of adverse scenarios. The Company has determined the capital required for it to withstand adverse experience equivalent to that which might be encountered once every 200 years and holds a buffer above the level so determined.

Although ASI Life does not maintain formal risk tolerance limits (given the simplicity of the business), the Board would consider possible and/or necessary actions if required capital is, or may become, unacceptable taking into account the risk, required capital and the specific circumstances. Such actions could include amendment to the risk management system to better control or mitigate those risks contributing to the capital requirement. Conversely, any proposed changes to the risk management system are considered to determine the likely impact on the Company's capital position.

B.4 Internal Control System

The framework is based around the Solvency II definition of operational risk which is 'the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events'. The Company's management of operational risk is therefore aimed at identifying risks in existing processes and improving existing controls to reduce the likelihood of failure and the impact of losses. A key element of the internal control system is the three lines of defence described in B.3.1.

ASI Life seeks continuous improvement to internal controls. The effective management of the risk process is overseen by SLA Group's Risk Division, facilitated through SLA Group's risk management system, Shield. This system is the central tool used by the business to manage risks arising through day to day operations. Shield also allows for linkage between risks, controls, events and issues, meaning any gaps or potential deficiencies are clearly highlighted. This assists SLA Group in improving its understanding, control and oversight of operational risks and in turn facilitates the achievement of its objectives.

SLA Group's compliance function sits within the Risk Division; a permanent and independent risk management function which is hierarchically and functionally independent from the SLA Group's operating units (first line).

The Risk and Compliance function includes dedicated teams in each region provide advisory services to the business who draw upon Risk and Compliance shared services team (e.g. anti-financial crime, assurance & monitoring) as required, covering:

- Business partner based alignment & relationship management, including specialisms by channel / asset type
- Risk & Compliance advisory services specific to the business channel / region / country
- Dedicated individuals responsible for compliance embedded in all regions/countries

There are also 3 other teams

1. Regulatory & Conduct team - they have a global remit for regulatory and conduct matters, covering: regulatory developments, horizon scanning and consultations; regulatory engagement; conduct risk oversight framework including SMCR and board engagement and reporting.
2. Investment Risk Oversight - subject matter expertise in the oversight of investment risk, covering: oversight of product lifecycle process; assurance of investment risk monitoring processes; oversight of operation of investment risk policies.
3. Corporate & Financial Risk - subject matter expertise in the oversight of corporate & financial risk within the Group.

B.5 Internal Audit Function

Internal Audit (IA) provides internal audit services to ASI Life via the MSA with AAML. IA is a global function working under a single mandate, a single methodology and to a single standard. IA's proposition, at the highest level, is split between offering independent advice, challenge and assurance and subject matter experts' perspective of risks and controls across the whole business with access to all data, documents, premises and members of staff. This includes the provision of assurance over other sources of assurance within the 2nd and 1st lines. The function reports direct to the SLA Group Audit Committee, with the Chief Internal Auditor (CIA) having a direct reporting line to the SLA Audit Committee Chair. The CIA also has a secondary, administrative reporting line to the SLA plc Chief Financial Officer. IA is governed by a charter that is reviewed annually and available on SLA's external website.

IA conducts a documented annual planning process with multiple inputs and drivers. These include work that is directed by the SLA Board or regulators as well as work informed by risk events, business engagement, corporate strategy and, increasingly, by data driven insight. The plan is reinforced and refreshed throughout the year by ongoing assessments of changes in the business' risk profile and the SLA Board's risk appetite. Issues identified are rated as high, medium or low and those rated high and medium are entered, with a business action plan, onto SLA's risk management system, Shield, to be managed by the responsible business team. For high issues, the audit team will re-engage and support the business in ensuring that the solution implemented is valid and sustainable. Individual audit reports are distributed to the accountable executives and relevant team leaders as well as to a number of standing recipients including the SLA Chief Executive, Chief Risk Officer and Regional Heads.

The SLA Group Audit Committee receives summary information to allow it to review the effectiveness of SLA Group's control environment.

The ASI Life Audit Committee meets at least twice yearly and is updated on all relevant IA reports. The IA Function attends these meetings, and also holds regular meetings with the ASI Life Chief Executive. The ASI Life Audit Committee may request that IA considers specific relevant topics or business areas for future audit work.

IA is committed to a philosophy of working to the highest ethical and professional standards and operates within the International Professional Practice Framework (IPPF) established by the Chartered Institute of Internal Auditors (CIIA). IA will comply with all relevant CIIA Standards and the Code of Ethics, or disclose non-conformance (subject to appropriate proportionality). IA also applies the recommendations from the Committee on Internal Audit Guidance for Financial Services on 'Effective Internal Audit in the Financial Services Sector (2017)'

B.6 Actuarial Function

The Actuarial Function is outsourced to Barnett Waddingham LLP. The role of Chief Actuary is held by an appropriately qualified and experienced individual who is a Barnett Waddingham LLP partner. The Company's Chief Executive provides oversight and assesses the performance of the arrangement.

B.7 Outsourcing

B.7.1 Outsourced Services

ASI Life relies on SLA Group to carry out all business functions other than the Actuarial Function. This outsourcing is governed by the MSA and IMA between ASI Life and AAML. The MSA is such that AAML is liable for all operational risk losses in respect of the ASI Life business, whether these occur as a result of a failure of AAML or as a result of a failure of a third-party provider and where that third party is unable or unwilling to compensate for any loss incurred. AAML may in turn rely on other parts of the SLA Group to carry out the contracted services. SLA Group operates a group wide risk and control framework which covers all services provided directly and indirectly to ASI Life via the MSA and IMA.

Under a tripartite arrangement custody services are provided by Citibank N.A. (Citi) and fund administration services are provided by Citi and DST Systems. Actuarial services are outsourced to Barnett Waddingham LLP. The services provided by these third parties are subject to appropriate contractual arrangements that protect ASI Life from losses incurred as a result of operational risk events.

All providers of outsourced services are located in the UK although some individual tasks may be carried out in a range of overseas locations.

Supplier relationships within SLA are governed and overseen, on a risk based approach, against the standards set within our procurement and supplier risk framework and Outsourcing Policy.

In addition, oversight of services outsourced to AAML via the MSA is a standing agenda item for the Risk Committee and members are provided with information on the quarterly service review meetings between the Company's management team and key internal service providers for review and/or challenge.

B.7.2 Key Points of Outsourcing Policy

- AAML uses the SLA Outsourcing Risk Oversight Framework to ensure outsourcing risks are clearly defined and regularly assessed with on-going monitoring of underlying controls both internally and within its outsourced service providers. SLA chooses its service providers carefully and regularly monitors and supervises their performance to ensure that functions are being performed satisfactorily, and to ensure that the Group is fulfilling its regulatory obligations and its contractual obligations to clients.
- SLA understands that while a service or function can be outsourced, the underlying risks and controls remain its responsibility. SLA is fully committed to actively managing these risks within its risk appetite.
- A risk assessment is performed on all outsourcers to assess the levels of risk exposure and to ensure all critical/material outsourcers are identified. Initial due diligence is performed on potential outsourcers based on the risk assessment.
- There are standard governance and oversight activities agreed for all levels of outsourcer risk to ensure appropriate levels of governance and oversight activities are performed in line with the level of risk exposure.
- Oversight of outsourcing risks is performed across the SLA Group with risk based monitoring and testing of control design and performance in outsourcers – across the three lines of defence.
- Continuity of service is a key component of the SLA Outsourcing Risk Oversight Framework to aim to ensure minimal impact to the Group and its clients in the event of a failure within one or more of its outsourcers or the sudden failure of a critical outsourcer.

B.8 Any Other Information

There is no other material information relating to the system of governance.

C. Risk Profile

The SLA Board sets the group risk appetite to define the nature and level of risk that the SLA Chief Executive and delegates are permitted to take to deliver the firm's strategic objectives. It is defined through a combination of risk appetite statements and tolerances.

Risk appetite tolerances are measured against risk metrics and are monitored on an ongoing basis so that prompt action may be taken as risks escalate or if the tolerances are likely to be breached. Executive management is responsible for staying within the SLA Board's risk appetite and operating an appropriate risk framework to monitor and inform appropriate and timely risk taking.

ASI Life adopts the high-level risk principles that guide the SLA Board's risk appetite when delivering its strategy and business plan objectives. These principles are in place to provide guidance to the business and help to drive business strategy in line with the SLA Board approved risk appetite:

- Risk appetites should be aligned with SLA's strategic objectives.
- Risk appetites take into account the interests of clients, shareholders and employees.
- Risk appetites should inform entity level Board risk governance and executive risk management.
- Risk appetites should be easy to apply, communicate and interpret.

ASI Life also adopts the SLA Board's risk appetite statements across a number of key risk categories and has its own risk appetite statements to reflect the requirements of being a Solvency II insurer:

- Operational Risk: SLA maintains a number of significant business and operational processes. We have no appetite for significant process, operations and trade errors that are detrimental to our clients or customers or compromise our financial strength or our reputation. We will maintain a strong and well established risk management framework as a foundation for the effective management of process risk across the business.
- Conduct: SLA has no appetite for unfair customer outcomes or poor market conduct, whether through deliberate or negligent actions. Consistent with our values, where unfair outcomes arise, the company will put it right in a fair and prompt manner.
- Regulatory and Legal Risk: SLA has no appetite to breach applicable laws, legislation or regulations, or to inadvertently breach contractual requirements. Where these are ambiguous or untested, it will take all reasonable steps to interpret and comply with their spirit and purpose, seek appropriate professional advice and ensure that fair outcomes for its customers, clients and other stakeholders are taken into

consideration when determining the appropriate course of action. Where breaches are identified, the company will ensure that these are resolved in a timely manner including, where appropriate, informing the relevant authorities.

- Financial Risk: SLA has no appetite to fail to maintain sufficient resources to meet its capital requirements and liabilities as they fall due. It will ensure it can do so under both normal conditions and an appropriate range of stressed scenarios. SLA has an appetite for market and credit risk exposures where these are required in pursuit of its business objectives. Exposures must be controlled to manage capital and liquidity requirements, concentration risk and the risk of financial loss.
- Strategic Risk: SLA has an appetite for strategic risk that arises as a consequence of pursuing its chosen business model. SLA will proactively identify and understand the strategic risks that it is exposed to, the options available to manage them and ensure that these inform strategy formation and business planning. SLA has a limited appetite for failing to deliver its business plan objectives as a result of underperformance that is within its direct control. Ongoing performance against the business plan will be closely monitored and prompt action taken to address any material adverse divergence.
- Liquidity Risk: ASI Life has a low tolerance to liquidity risk in relation to shareholder assets. All shareholder assets are held in cash or in the ASI Liquidity Fund (Lux) Sterling Fund which allows daily dealing. Given the nature and size of the Liquidity Fund, large redemptions can typically be made without impacting on the fund share price. The linked assets are managed to provide appropriate liquidity, in normal circumstances, to allow policyholder redemptions to be met as they fall due. Fund managers use tools to project forward their cash balances and ensure that they have appropriate cash in the portfolio to meet obligations on a daily basis. In addition, ASI Life has the contractual ability to suspend transactions where this is considered to be in the interests of policyholders. Liquidity requirements for assets managed under SIM contracts depend upon client-specific requirements, noting that the assets managed under these contracts remain the legal property of the client.

Given the simplicity of the business and the risks accepted, ASI Life does not, in general, set quantifiable risk tolerances and limits. ASI Life's risk appetite is aligned with its capital management policy to maintain solvency cover at or above its target level under stressed conditions as measured under stress and scenario tests (allowing for management actions as appropriate) carried out as part of the company's ORSA. The solvency cover target level is currently the greatest of 196% of the SCR and 150% of the ORSA capital requirement.

Significant changes to the ASI Life business model, operating model or risk profile may prompt a review of the risk appetite statement. Such circumstances might include:

- Changes in legislation regulation;
- Entering or writing a new class of insurance business;
- Significant changes to business strategy;
- Major industry changes or developments; and
- Material or key risk changes.

C.1 Underwriting risk

Underwriting risk means the risk of loss or of adverse change in the value of insurance liabilities, due to inadequate pricing and provisioning assumptions.

ASI Life has zero tolerance for insurance risks other than lapse (surrender) and expense risk. Contracts include no guaranteed benefits and contain no economic insurance risk. Although TIP policies include annuity options (on non-guaranteed terms) no annuities are currently written. Therefore the Company has no direct exposure to mortality or morbidity risks and does not transfer risks to special purpose vehicles.

Lapse risk is measured by the loss of assets under management which reduces future fund charge income and consequently potentially impacts both current and future years' profits. Expense risk is measured by the impact on current and potentially future years' profit.

ASI Life has a high tolerance to lapse risk and the consequent variation in fund charges earned as lapse risk is an inevitable part of insurance investment business. The risk of fluctuations in income is managed, where possible, by making expenses sensitive to the volume of charges received. This is achieved under the terms of the MSA between the Company and AAML whereby the majority of expenses payable are defined as a percentage of fund charge income. ASI Life aims to minimise lapses by providing a dedicated client service team, which has been set up specifically to meet the needs of UK pension schemes.

ASI Life's solvency position is not very sensitive to changes in lapse assumptions. If the best-estimate lapse rate is doubled, own funds reduce by £0.02m (2018: £0.08m), the SCR reduces by £0.01m (2018: £0.10m) and there is a 3% (2018: 13%) increase in SCR cover. Solvency cover is the Company's own funds divided by the SCR and the change in SCR cover is the SCR cover under the sensitivity less the SCR cover reported at the valuation date.

ASI Life has a low tolerance to expense risk. As mentioned above, the majority of expenses (fee related expenses) are defined as a set percentage of fund charge income. Modest additional expenses are incurred. The expense risk on these additional expenses is managed by:

- Reducing fee-related expenses if retained fund charge income is otherwise insufficient to meet the additional expense
- Close monitoring of the additional expense amounts and their justification

An increase in expenses leads to an increase in required capital under the Solvency II standard formula (all else equal). This risk is managed in all but extreme circumstances by contractual provisions between ASI Life and AAML which reduce fee related expenses if necessary such that retained fund charge income is sufficient to meet the increase in required capital together with the required margin of cover.

There has been no material change to underwriting risk or how it is measured over the reporting period.

The only material risk concentration is that individual policies may account for a significant percentage of assets under management. At 31 December 2019 the largest individual unit-linked policy accounted for 22% of the Company's unit-linked assets (2018: 30%). The largest SIM policy accounted for 51% of the assets managed under such contracts. (2018: 67%).

The nature of the expenses payable under the agreements between the Company and AAML are such that, while changes in experience will affect profitability, the Company is protected from making a loss in all but extreme circumstances (a significant rise in non-fee related expenses and/or a significant fall in assets under management).

ASI Life's solvency position is not very sensitive to changes in expense assumptions. If the best-estimate of expenses not defined in relation to fee income are increased by 25%, own funds reduce by £0.05m (2018: £0.03m), the SCR reduces by £0.04m (2018: £0.03m) and the SCR cover increases by 11% (2018: 3%).

The impact of adverse lapse and expense experience are considered in the ORSA under a number of scenarios. These demonstrate that the Company is able to withstand extreme adverse lapse and/or expense experience whilst continuing to meet regulatory capital requirements and without impacting on its ability to meet policyholder obligations in full.

C.2 Market risk

Market risk means the risk of loss or of adverse change in the financial situation resulting, directly or indirectly, from fluctuations in the level and in the volatility of market prices of assets, liabilities and financial instruments.

Shareholder assets, linked assets and assets managed under SIM contracts are considered separately.

ASI Life has a low tolerance to market risk on shareholder assets. The shareholder assets are used to cover the SCR, the MCR and any technical provisions in excess of the linked assets, and are invested to preserve capital. Investments are located in the EU and limited to cash, short term bonds and short term money market instruments. Investment in short term bonds and money market instruments is achieved by investing in the ASI Liquidity Fund (Lux) Sterling Fund (Liquidity Fund), a money market UCITS fund.

ASI Life has a high tolerance to market risk on linked assets and assets managed under SIM contracts. ASI Life accepts that because it is conventional practice for investment charges to be expressed as a percentage of assets under management, its revenue from fund charges will be subject to market movements and the choices made by its customers on the allocation to different internal linked funds or investment strategies. This risk of fluctuations in income is managed, where possible, by making expenses sensitive to the volume of charges received.

The linked assets are managed in accordance with the investment mandate for the particular fund taking into account the prudent person principle requirements under the PRA Investments Rulebook and the permitted links rules included in the FCA Conduct of Business Sourcebook (COBS) 21. In particular, policyholder liabilities are fully matched with units established within the relevant internal linked funds and with assets of the same value.

Assets managed under SIM contracts are invested under client-specific investment mandates taking into account the prudent person principle requirements.

ASI Life's solvency position is not very sensitive to changes in the market value of assets under management. If all managed asset values were to increase by 10%, own funds increase by £0.03m (2018: £0.16m), the SCR increases by £0.02m (2018: £0.17m) and SCR cover reduces by 6% (2018: 20%). If all managed asset values were to fall by 10%, own funds fall by £0.03m (2018: £0.15m), the SCR falls by £0.02m (2018: £0.18m) and SCR cover increases by 5% (2018: 24%).

There has been no material change to market risk or how it is measured over the reporting period.

The Company investigates the potential impact of market risks on its income and solvency position by way of stress and scenario tests that are carried out as part of the ORSA process. These demonstrate that ASI Life is able to withstand extreme market falls whilst continuing to meet regulatory capital requirements and without impacting on its ability to meet policyholder obligations in full, but recognising that policyholder obligations will reflect the impact of market risks on linked assets.

C.3 Credit risk

Credit risk means the risk of loss or of adverse change in the financial situation, resulting from fluctuations in the credit standing of issuers of securities, counterparties and any debtors to which insurance and reinsurance undertakings are exposed, in the form of counterparty default risk, or spread risk, or market risk concentrations.

Service provision, shareholder assets, linked assets and assets managed under SIM contracts are considered separately.

ASI Life has a low tolerance to credit risk in relation to third party service providers. The risk of a service provider defaulting on its obligations is primarily managed by initial and on-going due diligence of the service provider together with protections included in service contract terms. The terms of the MSA between the Company and AAML are such that ASI Life would seek redress from AAM Group if a third party service provider was unable or unwilling to meet its financial obligations towards the Company.

ASI Life has a low tolerance to credit risk in relation to shareholder assets. The risk is managed by limiting direct exposure to cash (bank) counterparties and investing other assets in a diversified portfolio of high quality short-term assets. The bank counterparties must meet the criteria set by the SLA Group Credit Risk Management Policy. For ASI Life, cash balances are, in normal circumstances, limited to £2m to any single counterparty although this limit may be temporarily exceeded for operational reasons. Cash balances are monitored daily. Diversification of non-cash assets is achieved by investing in the Liquidity Fund.

The tolerance to credit risk in relation to linked assets depends upon the investment objectives of each fund, but is generally low and is managed according to individual fund mandates. Thresholds are set for each fund to limit cash at the custodian, with a daily sweep into the Liquidity Fund to diversify counterparty exposure and reduce risk.

The tolerance to credit risk in relation to SIM contracts depends upon client-specific investment objectives.

The risk to ASI Life of fluctuations in charge income as a result of asset defaults in the linked funds or under SIM contracts is managed, where possible, by making expenses sensitive to the volume of charges received.

There are no material risk concentrations other than to bank counterparties, with such exposures managed as described above.

ASI Life's solvency position is currently not very sensitive to the credit quality of its bank counterparties. If all bank counterparties are downgraded by one credit quality step, own funds are unchanged, the SCR increases by £0.02m (2018: £0.02m) and SCR cover falls by 6% (2018: 3%).

There has been no material change to credit risk or how it is measured over the reporting period.

The Company investigates the potential impact of credit risks on its income and solvency position by way of stress and scenario tests that are carried out as part of the ORSA process. These demonstrate that ASI Life is able to withstand extreme credit events whilst continuing to meet regulatory capital requirements and without impacting on its ability to meet policyholder obligations in full, but recognising that policyholder obligations will reflect the impact of credit risks on linked assets.

C.4 Liquidity risk

Liquidity risk means the risk that insurance and reinsurance undertakings are unable to realise investments and other assets in order to settle their financial obligations when they fall due.

Shareholder assets, linked assets and assets managed under SIM contracts are considered separately.

ASI Life has a low tolerance to liquidity risk in relation to shareholder assets. All shareholder assets are held in cash or in the Liquidity Fund which allows daily dealing. Given the nature and size of the Liquidity Fund, large redemptions can typically be made without impacting on the fund share price.

The linked assets are managed to provide appropriate liquidity, in normal circumstances, to allow policyholder redemptions to be met as they fall due. Fund managers use tools to project forward their cash balances and ensure that they have sufficient cash in the portfolio to meet obligations on a daily basis. In addition, ASI Life has the contractual ability to suspend transactions where this is considered to be in the interests of policyholders.

Liquidity requirements for assets managed under SIM contracts depend upon client-specific requirements, noting that the assets managed under these contracts remain the legal property of the client.

There has been no material change to liquidity risk or how it is measured over the reporting period.

Given the nature of the business written by ASI Life, the expected profit in future premiums calculated in accordance with Article 260(2) of the Delegated Regulation is zero.

C.5 Operational risk

Operational risk means the risk of loss arising from inadequate or failed internal processes, personnel or systems, or from external events.

ASI Life has a low tolerance to operational risk. ASI Life considers operational risk in respect of internal processes, personnel or systems as being transferred to AAML or third party suppliers through outsourced service agreements. SLA Group operates an

Operational Risk Management Policy which applies to all services carried out by AAML for ASI Life.

Operational risk from external events is primarily managed by ensuring compliance with current regulation and legislation, and by maintaining the ability to react appropriately to external risks and issues. As part of its ORSA process, ASI Life considers the impact of external influences on its business model and considers the management actions that might be taken to address any issues.

There has been no material change to operational risk or how it is measured over the reporting period.

C.6 Other material risks

ASI Life has limited exposure to currency risk from overseas assets held within certain unit-linked funds or managed under certain SIM contracts. Exchange rate fluctuations will result in fluctuations in charges which are based on sterling-equivalent asset values. This risk of fluctuations in income is managed, where possible, by making expenses sensitive to the volume of charges received.

ASI Life has a high tolerance to group risk and, in general, accepts the risk without management, reflecting the rationale for the existence of ASI Life. However, within group risk, ASI Life closely manages AAML's obligations to compensate ASI Life for any operational risk losses. In addition to the contractual protections given in the internal and external outsourcing agreements, ASI Life also considers the capital position and the extent of insurance cover maintained by AAML in determining the ongoing security of the outsourcing arrangement.

It should be noted that in the event of any significant group issues, ASI Life has the ability to terminate all contracts at three months' notice.

ASI Life does not write any outward reinsurance and does not hold any off-balance sheet positions.

C.7 Any other information

There is no other material information regarding the risk profile of the Company.

D. Valuation for Solvency Purposes

D.1 Assets

ASI Life's assets are primarily those held to back unit-linked liabilities. The Solvency II valuation for each material class of asset is contained in Quantitative Reporting Template (QRT) reference S.02.01 and shown in the box below.

Article 75 of the Solvency II Directive requires that assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction. This valuation basis is similar to the 'fair value' accounting concept which is defined within IFRS 13 as 'the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants.'

ASI Life has prepared its financial statements in accordance with FRS 101 and the Companies Act 2006. This basis requires many assets and liabilities to be recognised at fair value in accordance with IFRS 13 (in which the term "Fair value" is defined). Other assets and liabilities are short term in nature and there is no material difference between their carrying value and fair value.

At 31 December 2019, the value of assets for solvency purposes is equal to the value of assets reported in the financial statements. This was also the case at 31 December 2018.

The methodology for valuing and recognising these assets are summarised below:

Balance sheet category	Accounting policy	Further detail of balances	Financial Statements 31-Dec-19 £m	Solvency II value 31-Dec-19 £m	Solvency II value 31-Dec-18 £m ²	QRT S.02.01 Reference
Collective Investments Undertakings	Fair value – using quoted market prices in active ¹ markets	Investment in quoted liquidity funds	13.15	13.15	10.26	R0180
Assets held for index-linked and unit-linked contracts	Fair value – using quoted market prices in active ¹ markets or other valuation techniques as disclosed in the financial statements where necessary	Assets held within the linked funds, primarily equities and holdings in collective funds. No properties are held directly.	1,152.09	1,152.09	1,467.68	R0220
Insurance and intermediaries receivables	Amortised cost - due to short-term nature of the receivables there is no material difference between the carrying value and fair value	Outstanding sales/ liquidations	0.82	0.82	0.32	R0360
Receivables (trade, not insurance)	Amortised cost - due to short-term nature of the receivables there is no material difference between the carrying value and fair value	Accrued income Prepayments Other debtors	1.95	1.95	1.56	R0380
Cash and cash equivalents	Amortised cost – based on statement values	Cash balances held	1.16	1.16	1.4	R0410

¹ Active market as defined in International Financial Reporting Standard 13-Appendix A.

² There was no difference between the financial statements and Solvency II value for these assets at 31 December 2018.

No other material assumptions or judgements have been used, (or contribute to uncertainty) in the valuation of assets.

D.2 Technical provisions

There are three lines of business, the TIP unit-linked insurance business, unit-linked reinsurance accepted on similar terms and SIM business. All business is pensions business.

The technical provisions at the valuation date are shown in the table below.

	As at 31-Dec-19 (£m)				As at 31-Dec-18 (£m)			
	SIM	TIP	Reinsurance accepted	Total	SIM	TIP	Reinsurance accepted	Total
Unit reserve	-	514.32	637.77	1,152.09	N/A	914.16	553.52	1,467.68
Value of in-force business	-0.04	-0.01	-0.02	-0.08	-0.71	-0.22	-0.13	-1.06
Risk margin	0.08	0.03	0.03	0.14	0.11	0.03	0.02	0.16
Total technical provisions	0.04	514.34	637.78	1,152.16	-0.6	913.97	553.41	1,466.78

Given the similarities between them, the same methods are used to determine the technical provisions for all lines of business written. The assumptions used are also the same other than where highlighted below.

Technical provisions have been determined for unit-linked business as the sum of the unit reserve, value of the in-force business (VIF) and the risk margin. The SIM technical provisions are the sum of the VIF for that business and the risk margin.

The movement in technical provisions is dominated by the fall in the unit reserve of £315.59m. This reflects the net impact on the Class III business of full and partial surrenders over the reporting period which have only been partially offset by investment returns on the linked assets and new business.

The VIF reflects the projected excess of income over expenses over the projection period. This is lower by £0.99m at 31 December 2019 compared to the previous year-end. The fees payable under the terms of the IMA and MSA between ASI Life and AAML are reduced from their normal level following a significant increase in in-force business to help ensure that the Company continues to meet its solvency targets. At 31 December 2018, the company had recently seen an influx of SIM business such that expenses payable over 2019 were lower than the normal level. This was reflected in the VIF at 31 December 2018. The VIF at 31 December 2019 allows for expenses to return to the (higher) normal level.

The risk margin, which is a function of operational risk SCR and life underwriting SCR, has decreased by £0.02m due to:

- Lower life underwriting SCR
 - The life underwriting SCR is a function of the VIF and is lower as a result of the lower VIF
- Lower market risk SCR
 - The equity risk SCR within the market risk module is a function of the VIF and significantly decreased as a result of the lower VIF

Offset in part by:

- Higher operational risk SCR
 - The operational risk SCR for the Company is a function of the expenses incurred in the twelve months to the reporting date, which have increased

D.2.1 Unit reserve and VIF

The unit reserve is the value of units allocated to in-force unit-linked contracts at the valuation date, as disclosed in the financial statements (unit liabilities). The unit reserve is reported as “technical provisions calculated as a whole” on form S.02.01.02 in Appendix 1.

The VIF has been determined, using recognised actuarial methods, as a best estimate calculation of the present value of the excess of policy charges over expenses, where a positive VIF is shown as a negative liability. The VIF is reported as the best estimate liability on form S.02.01.02 in Appendix 1.

A deterministic cash-flow projection method is used to determine the VIF. Although the Company manages the business on a long-term basis, the VIF projection is limited to three months. This reflects the Company’s ability to terminate all contracts subject to a three-month notice period. The use of a short projection period has been discussed with the PRA and is considered by the Board to be a proportionate simplification compared to performing a long-term projection in accordance with Delegated Regulation Article 56. The use of a long-term projection is considerably more subjective given the nature of the business. The use of the short-term projection at 31 December 2019 results in a prudent level of technical provisions compared to a long-term projection and does not understate the risks associate with the business.

The projection involves estimating the policy charges and expenses cash flows that the Company expects to receive and incur respectively in each month of the three-month projection period, based on the business in force at the valuation date and using best estimate projection assumptions. The policy charge cash flows are projected separately for the unit-linked and SIM business. Expense cash flows are projected in aggregate, using the separately projected policy charge cash flows where relevant. The net “charges less expenses” cash-flow in each month is then discounted to the valuation date to give a present value.

The policy charges cash flows are annual management charges (fee income) which are either deducted directly from unit-linked funds, or otherwise invoiced directly to policyholders.

The expenses cash flows fall into three categories:

- Expenses that are a percentage of net fee income received as contractually defined in the contractual agreements between the Company and AAML;
- Administration and custodian services charges as contractually defined in the services agreements between the Company and external third parties;
- Other expenses that are fixed or variable monetary amounts (direct expenses).

The administration and custodian service charges depend to an extent upon transaction volumes and are in part met by policyholders by way of recharges to the unit-linked funds used to determine policyholder benefits. The projected overall level of such fees and the split between the part met by policyholders and the part met by the Company is based on recent experience.

Net fee income is defined as fee income received less any fee rebates reimbursed to policyholders less the share of administration and custodian service charges met by the Company.

The assumption for direct expenses is based on the Company's expectations taking into account experience over the 12 months to the valuation date and any anticipated changes.

Economic assumptions are based on market data at the valuation date. Withdrawal assumptions are based on actual experience of the unit-linked business over a six year period to the valuation date, adjusted as necessary to make appropriate allowance for extraordinary events. There is currently insufficient experience data to derive credible withdrawal assumptions separately for the SIM business, as it was introduced at the end of 2018. It is assumed that the average rate of fee income on the in-force business at the valuation date is maintained throughout the projection period, with the average rate of fee income determined separately for the unit-linked and SIM business.

There is no obligation for policyholders to pay additional premiums other than, for some policies, where annual management charges are invoiced and paid by way of premiums. The technical provisions therefore include no allowance for additional premiums other than charges.

D.2.2 Risk margin

The risk margin has been assessed in accordance with the methodology set out in the Delegated Regulation as the cost of holding an adjusted SCR over the projected run-off of the business.

Given all business is projected over three months, the risk margin has been determined over a one year period, the minimum period allowed by the regulations. In accordance with the Delegated Regulation, it has been calculated on the result of the SCR at the valuation date but with the bank counterparty default and market risk module SCR set equal to zero on the assumption that these risks could be hedged if required.

The risk margin has been apportioned across the three lines of business in proportion to the respective VIF. This is considered a proportionate and appropriate approach as the amount of VIF is a reasonable proxy for the risk associated with each line of business and the impact of using a different apportionment method would not be material to the overall technical provisions by line of business.

D.2.3 Simplifications

The use of a three-month projection period, reflecting the Company's ability to terminate all contracts subject to a three-month notice period, is a simplification. At 31 December 2019, a longer term projection period would lead to lower technical provisions.

The VIF has been determined using an aggregate approach. Under the aggregate approach, policy charge cashflows are projected in aggregate, split only between unit-linked and SIM business and expense cash flows are projected for the business as a whole, not at an individual policy level. The resulting VIF is then apportioned between unit-linked and SIM business based on their respective anticipated contribution to fee income less expenses. The unit-linked VIF is then apportioned between reinsurance accepted and TIP business based on the size of their respective unit reserve.

This approach involves the following simplifying assumptions:

- A single rate of surrender is used across all funds and all lines of business. In reality, surrender rates are likely to vary by fund and line of business. However, surrender rates for the business written by the Company are very hard to predict as they will depend on a number of factors including relative investment performance, market sentiment over a particular fund, the individual circumstances of the policyholder and the size of the policyholder's investment with the Company. However, the VIF is relatively insensitive to the surrender assumptions and, given the value of the VIF compared to the total technical provisions, more granular assumptions are unlikely to lead to materially different technical provisions.
- The approach used to apportion the VIF between lines of business implicitly assumes that expenses defined as monetary amounts (as opposed to percentage of policy charges) are apportioned over individual policies on a pro rata basis based on the monetary amount of annual policy charge each policy is expected to generate. A different allocation of the monetary expenses would not change the overall VIF, given the way expenses are determined, but could affect the split of the total between the lines of business. Given that the Company considers monetary expenses at a company level, this implicit apportionment, effectively by ability to pay, is not unreasonable, especially taking into account the low materiality of the VIF compared to the total technical provisions.

D.2.4 Uncertainty associated with the value of technical provisions

The methodology employed is proportionate to the nature, scale and complexity of the risks accepted by the Company.

There are no material deficiencies in the data used for the technical provisions.

All business written is unit-linked pensions business or pensions investment management with no investment guarantees. The unit liabilities are matched by holding the assets upon which the unit liabilities are determined.

The Company has the unilateral right to terminate contracts subject to three months' notice. This is a typical policy clause for the type of business written by the Company, which is sold only to institutional investors and protects the Company against the long-term impact of adverse experience. The expense agreements in place between the Company and others within the AAM Group are such that in normal circumstances the Company retains only a modest percentage of net fee income out of which it needs to meet direct expenses. The retained amount is however increased if it would otherwise be insufficient to cover the direct expenses. The extent of the retained net fee income in excess of direct expenses is currently also modest.

Although the VIF depends upon the projection assumptions, the result is small in comparison to the overall technical provisions, which are dominated by the value of the unit liabilities. Consequently, if different plausible assumptions or more complex methodology were to be used, the technical provisions would not be materially different.

D.2.5 Reconciliation with financial statements

All unit-linked contracts written by the Company are treated as investment contracts under applicable accounting rules. The accounting treatment for such contracts is to value the contracts at 'fair value', essentially the market value of the assets within the unit-linked funds, and no less than the amount that would be payable on immediate surrender.

The assets managed by the Company under SIM contracts are not shown in the financial statements.

The technical provisions reported in the Company's financial statements are therefore taken as the unit liabilities of £1,152.09m. The technical provisions for solvency purposes are £0.06m higher than the technical provisions reported in the financial statements, reflecting the VIF and the risk margin held for solvency purposes.

D.2.6 Adjustments and transitional arrangements

A matching adjustment (as referred to in Article 77b of Directive 2009/138/EC) is not used.

A volatility adjustment (as referred to in Article 77d of Directive 2009/138/EC) is not used.

The transitional adjustment in respect to the risk-free interest rate-term structure (as referred to in Article 308c of Directive 2009/138/EC) is not used.

The transitional deduction in respect to technical provisions (as referred to in Article 308d of Directive 2009/138/EC) is not used.

D.2.7 Reinsurance

The Company has no recoverables from reinsurance contracts and has transferred no risks to special purpose vehicles.

D.2.8 Material changes in assumptions

The Company has made no material changes to assumptions since the previous reporting period.

D.3 Other Liabilities

At 31 December 2019, the value of other liabilities for solvency purposes was £3,576k (2018: £2,827k). At 31 December 2019 this is the same value as that reported in the financial statements. At 31 December 2018 other liabilities of £2,657k were reported in the financial statements, the difference compared to the solvency value being a notional deferred tax liability on the excess of the

VIF over the risk margin at that date. The values, basis of valuation and explanation of balances held are shown below. References (in brackets) are also given to where amounts can be found on QRT S.02.01.

D.3.1 Trade and other payables

Balances are initially measured at fair value less directly attributable transaction costs and subsequently measured at amortised cost using the effective interest rate method. In practice the carrying values equate to the fair values due to the short term nature of the amounts. (Insurance & intermediaries payables £817k (R0820) (2018: £315k), Trade and other payables £2,697k (R0840) (2018: £2,257k).

D.3.2 Deferred Taxation

A change in the basis of taxation for the Company, implemented in 2013, led to the recognition of profits that had previously been tax deductible. Under transitional arrangements those profits are recognised uniformly over the 10 year period commencing 1 January 2013. The deferred tax liability in the financial statements at 31 December 2019, £62k (2018: £85k), is determined using the relevant rates of tax which apply over the remaining deferral period. At 31 December 2018 there was an additional deferred tax liability of £171k, calculated as notional deferred tax on the profit represented by the excess of the VIF over the risk margin. There is no similar additional adjustment at 31 December 2019 as the risk margin is greater than the VIF and the Company has ignored the possibility of establishing a deferred tax asset on the excess of the risk margin over the VIF on grounds of materiality. (Deferred tax liabilities £62k (R0780) (2018: £255k)).

D.3.3 Contingent liabilities

The IFRS valuation (prescribed by IAS 37) defines a contingent liability as:

- A possible obligation that arises from past events and whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the entity
- A present obligation that arises from past events but is not recognised because; (i) it is not probable that an outflow of resources embodying economic benefits will be required to settle the obligation; or (ii) the amount of the obligation cannot be measured with sufficient reliability

A contingent liability will be disclosed under IFRS but not recognised. The Solvency II Directive states that contingent liabilities should be recognised if considered 'material'.

As at 31 December 2018 and 2019, the Company has concluded it holds no contingent liabilities.

D.4 Alternative methods for valuation

As at 31 December 2019, assets held included holdings in collective investment undertakings which require valuation techniques which are classified as alternative valuation methods under Solvency II categorisations. However valuation uncertainty is considered immaterial given daily pricing of collectives held.

D.5 Any other information

There is no other material information regarding the valuation of assets and liabilities for solvency purposes.

E. Capital Management

E.1 Own funds

The Company seeks to maintain sufficient capital resources of appropriate quality to give policyholders assurance of our financial strength and to satisfy the requirements of the regulators. The capital management policy is designed to ensure that all capital requirements are met out of retained profits without the need to seek other forms of capital.

All of the Company's own funds are classified as Tier 1 basic own funds comprised of equity and retained earnings and are available to provide cover for both the SCR and the MCR without restriction. Own funds are predominately invested to preserve capital values, typically in a diverse portfolio of cash and short-dated instruments.

The Company performs financial projections under central and adverse scenarios to assess the capital required over a three-year business planning period.

E1.1 Capital Management Policy

The Company may distribute by way of dividend the full amount of distributable profits disclosed in the audited accounts each year, or other amount as agreed provided that, following such payment ASI Life will continue to hold a level of cover, as deemed appropriate by the Board, above the appropriate regulatory requirement applicable to the Company, or such other amount as may be

agreed and having regard to the Company's business plan.

The Company's policy is to hold sufficient capital such that it may be treated under Article 199 of the Delegated Regulation as being equivalent to an entity with credit quality step 1 or any other maximum requirement applicable to the Company. This target has been set in order that the Company is able to demonstrate adequate financial strength but is not intended to represent any particular risk appetite.

The Board may cancel, amend or withhold dividends at any time prior to payment if such cancellation or amendment is necessary for the Company to meet regulatory requirements or its internal targets.

Prior approval by the PRA is not required by the Board for any dividend payment if the risk appetite of the company is maintained.

There have been no material changes to the capital management policy over the reporting period. Any change in the capital management policy will be approved by the Board.

The Company monitors its capital position on an ongoing basis.

Own funds at 31 December 2019 are as follows:

	As at 31-Dec-19 (£m)	As at 31-Dec-18 (£m)
Tier 1 unrestricted		
Ordinary share capital	1.5	1.5
Reconciliation reserve	11.93	10.1
Total own funds	13.43	11.6
Solvency Capital Requirement (SCR)	2.1	2.73
SCR cover	640%	425%
Minimum Capital Requirement (MCR)	3.19	3.29
MCR Cover	421%	353%

The total own funds have increased during the period, primarily due to net of tax profits earned during the period, offset by a reduction in the VIF. SCR cover has increased as a result of the increase in own funds and a decrease in the SCR that is discussed further in section E.2.

The Company's MCR equals the €3.7m absolute floor as set out in regulation. The decrease in MCR since 31 December 2018 is due to the change in the Sterling: Euro exchange rate between 31 October 2018 and 31 October 2019, these being the dates, as set out in regulation, at which the exchange rate for the

absolute floor are set for the previous and current reporting period respectively.

The reconciliation reserve comprises retained profits and the difference between the technical provisions and other liabilities for solvency purposes and the technical provisions and other liabilities reported in the financial statements.

At 31 December 2019, the difference between equity shown in the financial statements and the excess of assets over liabilities used for solvency purposes arises from the combined impact of the VIF and

the risk margin that are not recognised in the financial statements but are reflected in the reconciliation reserve. At 31 December 2018 the Solvency II deferred tax liability was different to the amount recognised in the financial statements as discussed in section D.3.2.

No basic own funds are subject to the transitional arrangements referred to in Articles 308b(9) and 308b(10) of directive 2009/138/EC. There are no ancillary own funds and no deductions made from the own funds.

	As at 31-Dec-19 (£m)	As at 31-Dec-18 (£m)
Solvency Capital Requirement		
Operational risk	2.16	1.66
Market risk	0.29	1.01
Life underwriting risk	0.09	1.07
Counterparty default risk	0.21	0.16
Diversification across risk modules	-0.15	-0.54
Tax adjustment	-0.49	-0.64
Total SCR	2.10	2.73
Minimum Capital Requirement	3.19	3.29

The total SCR has decreased by £0.63m to £2.10m at 31 December 2018. The main contributions are:

- A decrease in both market risk and underwriting risk reflecting the lower VIF at 31 December 2019 and consequently the lower loss of value under the equity stress and mass lapse stress in particular; offset by
- An increase in operational risk due to higher expenses incurred in the twelve months to 31 December 2019 compared to those incurred in the twelve months to 31 December 2018, driven primarily by an increase in the average level of in-force business over 2019 compared to 2018; and
- A decrease in the size of the tax adjustment due to a lower SCR in aggregate.

The tax adjustment, also known as the loss absorbing capacity of deferred taxes (LACDT), is £0.49m (2018: £0.64m) and is calculated in accordance with Article 207 of the Delegated Regulation. As at 31 December 2019, if a notional loss equal to the SCR is incurred, this loss would be offset against profits in the year to 31 December 2019 leading to a reduction in tax payable by the Company. The tax adjustment has been calculated using a tax rate of 19%.

No future taxable profits or deferred tax liabilities have been used to justify the tax adjustment at 31 December 2019.

The Company has not applied any of the simplifications outlined in Articles 88 to 112 of the Delegated Regulation. The Company is taking a proportionate and simplified approach to calculating the SCR for market risk in that all unit-linked assets and assets managed under SIM policies are assumed to be invested in 'Type 2' equities as defined in Article 168 of the Delegated Regulation. This approach has been confirmed as acceptable by the PRA subject to ongoing monitoring.

No undertaking specific parameters are used to calculate the SCR pursuant to Article 104(7) of Directive 2009/138/EC.

The Company has not made use of the option provided for in the third subparagraph of Article 51(2) of Directive 2009/138/EC.

There are no deferred tax assets as at 31 December 2019.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

The SCR is determined using the standard formula. The SCR and MCR as at 31 December 2018 is shown below.

The Company is not required to use any undertaking specific parameters in accordance with Article 110 of Directive 2009/138/EC. No capital add-on has been applied to the SCR.

The MCR calculation is set out in the Delegated Regulation. Given the nature of the Company's business, the required inputs to the calculation that are not defined under the regulations are limited to:

- The technical provisions excluding the risk margin for unit-linked life insurance and reinsurance obligations of £1,152,06m (2018: £1,467.33m)
- The technical provisions excluding the risk margin for other life insurance and reinsurance obligations (SIM business) of £-0.04m (2018: £-0.71m), which are floored at £nil
- The amount of capital at risk. Given payments made under the contracts issued by the Company are not directly contingent on death, the capital at risk is taken to be zero.

The MCR for the Company is currently based on the €3.7m monetary minimum set out in regulations.

E.3 Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement

The Company does not use the duration-based equity sub-module option as set out in Article 304 of Directive 2009/138/EC.

E.4 Differences between the standard formula and any internal model used

The Company is not using an internal model.

E.5 Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement

The Company has complied fully with both the MCR and SCR during the reporting period.

E.6 Any other information

There is no other material information regarding the capital management of the Company.

F. Statement of Directors' Responsibilities

The Directors acknowledge their responsibility for the preparation of the Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations, which have been modified by the modifications, and supplemented by the approvals and determinations made by the PRA under Section 138A of FSMA, the PRA Rules and Solvency II regulations on which they are based, as detailed in the Prudential Regulation Authority waivers and discretions section of this document.

The Board is satisfied that the best of its knowledge and belief:

- (a) throughout the financial year to 31 December 2019, ASI Life has complied in all material respects with the requirements of the PRA rules and Solvency II Regulations as applicable to the Company; and
- (b) it is reasonable to believe that in respect of the period from 31 December 2019 to the date of publication of the SFCR the Company has continued so to comply, and will continue so to comply for the remainder of the financial year to 31 December 2020.

The SFCR was approved by the Board and signed on its behalf by the following Director.



Aron Mitchell
Director and Chief Executive Officer
Aberdeen Standard Investments Life and Pensions Limited
(ASI Life)
Date: 07 April 2020

Prudential Regulation Authority waivers and discretions

The waivers and discretions in the table below apply to ASI Life

Description	Reference	Date of approval	Applicable from
Reporting 2.2 (1) AR Modification of Solvency II quarterly reporting requirements	2151065	26 August 2015	1 January 2016
Modifies financial conglomerate assessment for group supervision	4988232	3 September 2018	3 September 2018

This document may contain certain 'forward-looking statements' with respect to the financial condition, performance, results, strategy, targets, objectives, plans, goals and expectations of the Company. These forward-looking statements can be identified by the fact that they do not relate only to historical or current facts. Forward-looking statements are prospective in nature and are not based on historical or current facts, but rather on current expectations, assumptions and projections of management about future events, and are therefore subject to risks and uncertainties which could cause actual results to differ materially from the future results expressed or implied by the forward-looking statements. For example but without limitation, statements containing words such as 'may', 'will', 'should', 'could', 'continue', 'aims', 'estimates', 'projects', 'believes', 'intends', 'expects', 'hopes', 'plans', 'pursues', 'ensure', 'seeks', 'targets' and 'anticipates', and words of similar meaning (including the negative of these terms), may be forward-looking. These statements are based on assumptions and assessments made by the Company in light of its experience and its perception of historical trends, current conditions, future developments and other factors it believes appropriate. By their nature, all forward-looking statements involve risk and uncertainty because they are based on information available at the time they are made, including current expectations and assumptions, and relate to future events and/or depend on circumstances which may be or are beyond the Company's control, including among other things: UK domestic and global political, economic and business conditions (such as the UK's exit from the EU); market related risks such as fluctuations in interest rates and exchange rates, and the performance of financial markets generally; the impact of inflation and deflation; the impact of competition; the timing, impact and other uncertainties associated with future acquisitions, disposals or combinations undertaken by the Company or its affiliates and/or within relevant industries; default by counterparties; information technology or data security breaches (including the Company being subject to cyberattacks); operational information technology risks; natural or man-made catastrophic events; climate change and a transition to a low carbon economy; exposure to third party risks including as a result of outsourcing; the failure to attract or retain necessary key personnel; the policies and actions of regulatory authorities; and the impact of changes in capital, solvency or accounting standards, and tax and other legislation and regulations (including changes to the regulatory capital requirements that the Company is subject to) in the jurisdictions in which the Company and its affiliates operate. As a result, the Company's actual future financial condition, performance and results may differ materially from the plans, goals, objectives and expectations set forth in the forward-looking statements. Persons receiving this document should not place reliance on forward-looking statements. Neither the Company nor its affiliates assume any obligation to update or correct any of the forward-looking statements contained in this document or any other forward-looking statements it or they may make (whether as a result of new information, future events or otherwise), except as required by law. Past performance is not an indicator of future results and the results of the Company and its affiliates in this document may not be indicative of, and are not an estimate, forecast or projection of, the Company's or its affiliates' future results.

Appendix 1

Contents

The following QRTs are required for the SFCR:

QRT ref	QRT Template name
S.02.01	Balance Sheet
S.05.01	Premiums, claims and expenses
S.05.02	Premiums, claims and expenses by country – Not reported as all business written in the UK
S.12.01	Life and Health SLT Technical Provisions
S.23.01	Own Funds
S.25.01	Solvency Capital Requirement – for undertakings on Standard Formula
S.28.01	Minimum Capital Requirement – only Life or only non-life insurance or reinsurance activity

All figures are shown in £'000s.

S.02.01.02 Balance Sheet

CHM	Assets	Solvency II value C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	0
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	13,151
R0080	Property (other than for own use)	0
R0090	Holdings in related undertakings, including participations	0
R0100	Equities	0
R0110	Equities - listed	0
R0120	Equities - unlisted	0
R0130	Bonds	0
R0140	Government Bonds	0
R0150	Corporate Bonds	0
R0160	Structured notes	0
R0170	Collateralised securities	0
R0180	Collective Investments Undertakings	13,151
R0190	Derivatives	0
R0200	Deposits other than cash equivalents	0
R0210	Other investments	0
R0220	Assets held for index-linked and unit-linked contracts	1,152,093
R0230	Loans and mortgages	0
R0240	Loans on policies	0
R0250	Loans and mortgages to individuals	0
R0260	Other loans and mortgages	0
R0270	Reinsurance recoverables from:	0
R0280	Non-life and health similar to non-life	0
R0290	Non-life excluding health	0
R0300	Health similar to non-life	0
R0310	Life and health similar to life, excluding health and index-linked and unit-linked	0
R0320	Health similar to life	0
R0330	Life excluding health and index-linked and unit-linked	0
R0340	Life index-linked and unit-linked	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	817
R0370	Reinsurance receivables	0
R0380	Receivables (trade, not insurance)	1,948
R0390	Own shares (held directly)	0
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	1,156
R0420	Any other assets, not elsewhere shown	0
R0500	Total assets	1,169,165

CHM	Assets	Solvency II value C0010
CHM	Liabilities	C0010
R0510	Technical provisions – non-life	0
R0520	Technical provisions – non-life (excluding health)	0
R0530	TP calculated as a whole	0
R0540	Best Estimate	0
R0550	Risk margin	0
R0560	Technical provisions - health (similar to non-life)	0
R0570	TP calculated as a whole	0
R0580	Best Estimate	0
R0590	Risk margin	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	38
R0610	Technical provisions - health (similar to life)	0
R0620	TP calculated as a whole	0
R0630	Best Estimate	0
R0640	Risk margin	0
R0650	Technical provisions – life (excluding health and index-linked and unit-linked)	38
R0660	TP calculated as a whole	0
R0670	Best Estimate	-45
R0680	Risk margin	83
R0690	Technical provisions – index-linked and unit-linked	1,152,120
R0700	TP calculated as a whole	1,152,093
R0710	Best Estimate	-32
R0720	Risk margin	60
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	0
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	0
R0780	Deferred tax liabilities	62
R0790	Derivatives	0
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	817
R0830	Reinsurance payables	0
R0840	Payables (trade, not insurance)	2,697
R0850	Subordinated liabilities	0
R0860	Subordinated liabilities not in Basic Own Funds	0
R0870	Subordinated liabilities in Basic Own Funds	0
R0880	Any other liabilities, not elsewhere shown	0
R0900	Total liabilities	1,155,734
R1000	Excess of assets over liabilities	13,431

S.05.01.02 Premiums, claims and expenses by line of business

CHM	Line of Business for: life insurance obligations										Life reinsurance obligations	
	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300			
	Health insurance participation	Insurance with profit	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	Total			
	Premiums written											
R1410	Gross	0	0	126,159	0	0	0	0	31,993	158,151		
R1420	Reinsurers' share	0	0	0	0	0	0	0	0	0		
R1500	Net	0	0	126,159	0	0	0	0	31,993	158,151		
	Premiums earned											
R1510	Gross	0	0	126,159	0	0	0	0	31,993	158,151		
R1520	Reinsurers' share	0	0	0	0	0	0	0	0	0		
R1600	Net	0	0	126,159	0	0	0	0	31,993	158,151		
	Claims incurred											
R1610	Gross	0	0	665,617	0	0	0	0	63,259	728,876		
R1620	Reinsurers' share	0	0	0	0	0	0	0	0	0		
R1700	Net	0	0	665,617	0	0	0	0	63,259	728,876		
	Changes in other technical provisions											
R1710	Gross	0	0	-139,624	0	0	0	0	-115,512	-255,136		
R1720	Reinsurers' share	0	0	0	0	0	0	0	0	0		
R1800	Net	0	0	-139,624	0	0	0	0	-115,512	-255,136		
R1900	Expenses incurred	0	0	3,385	4,068	0	0	0	904	8,357		
R2500	Other expenses									0		
R2600	Total expenses									8,357		

S.23.01.01 Own Funds

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
CHM	C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35					
R0010 Ordinary share capital (gross of own shares)	1,500	1,500		0	
R0030 Share premium account related to ordinary share capital	0	0		0	
R0040 Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	0	0		0	
R0050 Subordinated mutual member accounts	0		0	0	0
R0070 Surplus funds	0	0			
R0090 Preference shares	0		0	0	0
R0110 Share premium account related to preference shares	0		0	0	0
R0130 Reconciliation reserve	11,931	11,931			
R0140 Subordinated liabilities	0		0	0	0
R0160 An amount equal to the value of net deferred tax assets	0				0
R0180 Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					
R0220 Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	0				
Deductions					
R0230 Deductions for participations in financial and credit institutions	0	0	0	0	0
R0290 Total basic own funds after deductions	13,431	13,431	0	0	0
Ancillary own funds					
R0300 Unpaid and uncalled ordinary share capital callable on demand	0			0	
R0310 Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0			0	
R0320 Unpaid and uncalled preference shares callable on demand	0			0	0
R0330 A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0			0	0
R0340 Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0			0	
R0350 Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0			0	0
R0360 Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0			0	
R0370 Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0			0	0
R0390 Other ancillary own funds	0			0	0
R0400 Total ancillary own funds	0			0	0
Available and eligible own funds					
R0500 Total available own funds to meet the SCR	13,431	13,431	0	0	0
R0510 Total available own funds to meet the MCR	13,431	13,431	0	0	
R0540 Total eligible own funds to meet the SCR	13,431	13,431	0	0	0
R0550 Total eligible own funds to meet the MCR	13,431	13,431	0	0	
R0580 SCR	2,100				
R0600 MCR	3,187				
R0620 Ratio of Eligible own funds to SCR	6.3952				
R0640 Ratio of Eligible own funds to MCR	4.2145				

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	Reconciliation reserve	C0060				
R0700	Excess of assets over liabilities	13,431				
R0710	Own shares (held directly and indirectly)	0				
R0720	Foreseeable dividends, distributions and charges	0				
R0730	Other basic own fund items	1,500				
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0				
R0760	Reconciliation reserve	11,931				
	Expected profits					
R0770	Expected profits included in future premiums (EPIFP) - Life business	0				
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	0				
R0790	Total Expected profits included in future premiums (EPIFP)	0				

S.25.01.21 Solvency Capital Requirement – for undertakings on Standard Formula

			Gross solvency capital requirement	USP	Simplifications
CHM			C0110	C0090	C0120
R0010	Market risk	R0010	286		
R0020	Counterparty default risk	R0020	210		
R0030	Life underwriting risk	R0030	89		
R0040	Health underwriting risk	R0040	0		
R0050	Non-life underwriting risk	R0050	0		
R0060	Diversification	R0060	-154		
R0070	Intangible asset risk	R0070	0		
R0100	Basic Solvency Capital Requirement	R0100	431		
CHM Calculation of Solvency Capital Requirement			C0100		
R0130	Operational risk	R0130	2,162		
R0140	Loss-absorbing capacity of technical provisions	R0140	0		
R0150	Loss-absorbing capacity of deferred taxes	R0150	-493		
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	0		
R0200	Solvency capital requirement excluding capital add-on	R0200	2,100		
R0210	Capital add-on already set	R0210	0		
R0220	Solvency capital requirement	R0220	2,100		
Other information on SCR					
R0400	Capital requirement for duration-based equity risk sub-module	R0400	0		
R0410	Total amount of Notional Solvency Capital Requirement for remaining part	R0410	0		
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	0		
R0430	Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	0		
R0440	Diversification effects due to RFF nSCR aggregation for article 304	R0440	0		
			Yes/No		
Approach to tax rate			C0109		
R0590	Approach based on average tax rate	R0590	2 - No		
Calculation of loss absorbing capacity of deferred taxes					
			LAC DT		
			C0130		
R0600	DTA	R0600			
R0610	DTA carry forward	R0610			
R0620	DTA due to deductible temporary differences	R0620			
R0630	DTL	R0630			
R0640	LAC DT	R0640	-493		
R0650	LAC DT justified by reversion of deferred tax liabilities	R0650	0		
R0660	LAC DT justified by reference to probable future taxable economic profit	R0660	0		
R0670	LAC DT justified by carry back, current year	R0670	-493		
R0680	LAC DT justified by carry back, future years	R0680	0		
R0690	Maximum LAC DT	R0690	-493		

S.28.01.01 Minimum Capital Requirement – only life or only non-life insurance or reinsurance activity

Linear formula component for non-life insurance and reinsurance obligations			
CHM		C0010	
R0010	MCRNL Result	0	
		Net (of reinsurance/ SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
CHM		C0020	C0030
R0020	Medical expenses insurance and proportional reinsurance	0	0
R0030	Income protection insurance and proportional reinsurance	0	0
R0040	Workers' compensation insurance and proportional reinsurance	0	0
R0050	Motor vehicle liability insurance and proportional reinsurance	0	0
R0060	Other motor insurance and proportional reinsurance	0	0
R0070	Marine, aviation and transport insurance and proportional reinsurance	0	0
R0080	Fire and other damage to property insurance and proportional reinsurance	0	0
R0090	General liability insurance and proportional reinsurance	0	0
R0100	Credit and suretyship insurance and proportional reinsurance	0	0
R0110	Legal expenses insurance and proportional reinsurance	0	0
R0120	Assistance and proportional reinsurance	0	0
R0130	Miscellaneous financial loss insurance and proportional reinsurance	0	0
R0140	Non-proportional health reinsurance	0	0
R0150	Non-proportional casualty reinsurance	0	0
R0160	Non-proportional marine, aviation and transport reinsurance	0	0
R0170	Non-proportional property reinsurance	0	0
Linear formula component for life insurance and reinsurance obligations			
CHM		C0040	
R0200	MCRL Result	8,064	
		Net (of reinsurance/ SPV) best estimate and TP calculated as a whole	Net (of reinsurance/ SPV) total capital at risk
CHM		C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits	0	
R0220	Obligations with profit participation - future discretionary benefits	0	
R0230	Index-linked and unit-linked insurance obligations	1,152,061	
R0240	Other life (re)insurance and health (re)insurance obligations	0	
R0250	Total capital at risk for all life (re)insurance obligations		0
CHM	Overall MCR calculation	C0070	
R0300	Linear MCR	8,064	
R0310	SCR	2,100	
R0320	MCR cap	945	
R0330	MCR floor	525	
R0340	Combined MCR	945	
R0350	Absolute floor of the MCR	3,187	
		C0070	
R0400	Minimum Capital Requirement	3,187	

