

#### 2022 Questionnaire

# for the April 2022 Insurance Capital Standard (ICS) Data Collection Exercise of the Monitoring Period Project

("the ICS Questionnaire")

The ICS Questionnaire has been developed as a supporting document for groups participating in the 2022 ICS Data Collection Exercise and must be read in conjunction with the associated ICS Technical Specifications, ICS data collection Template and Yield Curve documentation. All documents are provided for information only.

These documents do not replace or supersede the ICS Level 1 and Level 2 documents, which have been agreed and published by the IAIS.



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#### 1 Introduction

#### 1.1 Preamble

This Questionnaire focuses on supplementary information in relation to data provided in the Template for the 2022 ICS Data Collection Exercise of the Monitoring Period Project, and is due **31 August 2022**.



# 2 Identification

1	Please provide the name of your IAIG/Volunteer Group below:		
	IAIG / Volunteer G	oup name	
	Insert text		
2			n of this questionnaire (dd/mm/yyyy). If an earlier been updated please indicate a new date here:
	Date of this submi	ssion	
	Insert text		
3			ct persons for queries about the responses to this and telephone number.
	Primary Contact	Information	
	Name:	Insert text	
	Email:	Insert text	
	Phone:	Insert text	
	Backup ContactInformationName:Insert textEmail:Insert text		
	Phone:	Insert text	



# **3 General Questions**

Template sheet(s) referred to in this section:	Various
Key Technical Specification section(s) relevant to this section	Various

4	Were any material assumptions or simplifications used when providing data on the reference ICS? Examples of assumptions or simplifications follow the questions.						
Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable  If YES, complete the following question for each material assumption or simplification used. Please specify the item or issue, including a reference to the Technical Specifications or Teand provide a description with sufficient detail to allow an assessment of materiality and poimpact. In the description, also indicate whether you anticipate future reliance on the assur simplification or was it due to circumstances such as a resource constraint.							
	Item name	Reference	Description				
	Insert text						
	Examples where  • 8.2 Defer	red tax from the	simplifications may have been used:  ICS Adjustments – Was difficulty encountered being able to offset in the ICS Adjustment where an assumption or simplification was				
5	Were any material changes made in reporting data for sections that have remained unchanged between Years 2 and 3 of the Monitoring Period (eg simplifications that were used during the first year of the Monitoring Period that are no longer being used )?						
	Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable  If YES, please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description as well as rationale for its relevance to analysis.  Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact.						



	Item name	Reference	Description and rationale		
	Insert text	Insert text	Insert text		
	(Add additional rows as I	necessary)			
6	6 Do you have further comments regarding ICS Version 2.0 for the monitoring period not spe addressed elsewhere in the Questionnaire?				
	Where appropriate, this includes comments on data, additional relevant data, and/or calculations that you consider relevant to the analysis (that is, have the potential to have a material impact on any conclusions reached based on the data and/or its analysis).				
	Provide your response by placing an 'x' in the relevant cell:				
	YES NO Not Applicable				
	If YES, please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description as well as rationale for its relevance to analysis.				
Please describe in summary, but with sufficient detail to allow an assessment of mate potential impact.			detail to allow an assessment of materiality and		
	Item name	Reference	Description and rationale		
Insert text Insert text Insert			Insert text		
	(Add additional rows as necessary)				



# 4 Perimeter of the ICS Calculation

Template Sheets referred to in this section:	GAAP and ICS Balance Sheets
Key Technical Specification sections relevant to this section	4. Reference ICS: Perimeter of the ICS Calculation

7	For the starting ICS balance sheet, did you encounter any difficulties splitting the insurance and non-insurance operations?					
	Provide your response by placing an 'x' in the relevant cell:					
	YES NO Not Applicable					
	If YES, please provide a description of issues that were encountered.					
	Amount	Description				
	Insert text	Insert text				
	(Add additio	nal rows as necessary)				
8	For the non-insurance portion of the ICS balance sheet, did you encounter any difficulties re-stating consolidated entities in your consolidated GAAP to a different basis of accounting (eg, joint ventures and joint operations)?					
	Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable					
	If YES, please provide a description of issues that were encountered.					
	Amount Description					
Insert text text						
	(Add additional rows as necessary)					
9	Has an amount been reported in the worksheet GAAP and ICS Balance Sheets, table Balance sheets, Row (-) adjustments already included in other equity items?					



	Provide your response by placing an 'x' in the relevant cell:				
	NO Not Applicable				
	If YES, please provide a description of what was included in the amount in sufficient detail to understand why the offset was necessary.				
	Amount	Description			
	Insert text	Insert text			
	(Add addition	nal rows as necessary)			
10	Has an amount been reported in the <i>Other</i> line in the <i>Equity</i> section of the worksheet <i>GAAP</i> and <i>ICS</i> Balance Sheets?				
	Provide your response by placing an 'x' in the relevant cell:				
	YES NO Not Applicable				
	If YES, please provide additional information on the amount so that the IAIS can determine whether that amount should be included within ICS capital resources.				
	Amount Description				
	Insert text				
	(Add additional rows as necessary)				



# 5 Market-Adjusted Valuation

MP Template Sheets referred to in this section:	GAAP and ICS Balance Sheets
Key MP Technical Specification sections relevant to this section	5. Reference ICS: Market- Adjusted Valuation

11	Are the Middle Bucket criteria appropriate?					
	Provide your response by placing an 'x' in the relevant cell:					
	YES	YES NO Not Applicable				
	If NO, please describe in detail how and why the criteria should be changed.					
	Please describe in summa direction of impact.	ary, but with sufficient detail to allow an assessment of materiality and				
	Item name	Description and rationale				
	Insert text	Insert text				
	(Add additional rows as ne	ecessary)				
12	Did you encounter any practical difficulties calculating the currency-specific Middle Bucket spread adjustment?					
	Provide your response b	y placing an 'x' in the relevant cell:				
	YES NO Not Applicable					
	If YES, please provide a description of the difficulties that were encountered.					
	Please describe in summary, but with sufficient detail to allow an assessment of materiality and direction of impact.					
	Item name Description and rationale					
	Insert text Insert text					



1	I					
	(Add additional rows	s as ne	ecessary)			
13	Please indicate the impact on the usage of the Middle Bucket if the Middle Bucket criteria changed as follows:			criteria were		
	than the current esti	mate of	of the liabilities otal market val	entified for this portforce calculated using the ue of assets, all assets at ion in Table 4.	risk-free General Bu	cket yield curve.
	1			ities do not include funde funde funde in be reliably estimate	-	clude only future
	•			ddle and General Bud the changes to para		
		Refe	rence ICS	Change to paragraph 135d)	Change to paragraph 135e)	Change to paragraphs 135d) and e)
	Middle Bucket					
	General Bucket					
	(Add additional rows	s as ne	ecessary)			
14	Please provide examples of insurance products for which future premiums can (and cannot) be reliably estimated. Please provide rationale for why the future premiums can or cannot be reliably estimated.					
			Examples		Rationale for class	sification
	Insurance products which future premiscan be reliably estimated					
	Insurance products which future premi					



	cannot be reliably estimated			
	(Add additional rows as ne	ecessary)		
15	Were either of the possible	e proxies for non-life premium liabilities applied?		
	Provide your response b	y placing an 'x' in the relevant cell:		
	YES	NO Not Applicable		
	calculation of non-life pren	ich proxy was used and provide details on the difficulties faced in the nium liabilities. Provide details on alternative proxies (including formulas) ider (references/ links to external sources are also welcome).		
	Item name	Description and rationale		
	Insert text	Insert text		
	(Add additional rows as ne	ecessary)		
16	Was the IAIS base yield co which the IAIS published of	urve methodology applied to any additional currency beyond the 35 for data?		
	Provide your response by	y placing an 'x' in the relevant cell:		
	YES	NO Not Applicable		
	If YES, please describe any difficulties experienced with the process.			
	Please describe in summary.			
	Item name	Description and rationale		
	Insert text	Insert text		
	(Add additional rows as necessary)			



# 6 Capital Requirement

# 6.1 Self-assessment template for natural catastrophe models

Template Sheets referred to in this section:	N/A
Key Technical Specification sections relevant to this section	7.2.4.7 Safeguards for Natural Catastrophe Models

17	Safeguard 1 – Description of the scope of application				
	The IAIG describes the perimeter of the natural catastrophe model's calculation.				
	Is Safeguard 1 met?	Is Safeguard 1 met?			
	Provide your response by	y placing an 'x' in the relevant cell:			
	YES	NO Not Applicable			
	If YES, please describe the	e scope of application of the natural catastrophe model.			
	Item name	Description and rationale			
	Insert text	Insert text			
	(Add additional rows as ne	Add additional rows as necessary)			
18	Do you have any natural catastrophe models that were developed internally?				
	Provide your response by placing an 'x' in the relevant cell:				
	YES NO Not Applicable				
	If YES, please describe the	e scope of application of each CAT model.			
	Item name Description and rationale				



	Insert text	Insert text		
	(Add additional rows as ne	ecessary)		
19	Safeguard 2 – Validation			
		at a rigorous process is in place by which they can establish whether their I framework is sound or whether improvements are needed.		
	Is Safeguard 2 met?			
	Provide your response by	y placing an 'x' in the relevant cell:		
	YES	NO Not Applicable		
	If YES, Please describe th	e validation process for the CAT model.		
	Item name	Description and rationale		
	Insert text	Insert text		
	(Add additional rows as ne	ecessary)		
20	Safeguard 3 – Sign-off by	senior management		
	The senior management of the IAIG has ownership of the natural catastrophe model, and the model complies with the validation process prescribed by the natural catastrophe model governance process.			
	Is Safeguard 3 met?			
	Provide your response by placing an 'x' in the relevant cell:			
	YES NO Not Applicable			
	If NO, please explain whet	ther a change is planned and the expected timeline.		
	Item name Description and rationale			



	Insert	text		Insert text			
	(Add ad	ditional rows	s as r	necessary)			
21	Safegua	ard 4 – Statis	stical	quality test			
	The statistical quality test addresses issues related to the following technical aspects of the natural catastrophe model:  • methodology and assumptions; • coverage of material risks; • data (including external data) and expert judgment; • aggregation of risks and diversification effects; • consistency with the method used for the calculation of technical provisions; • allowance for risk mitigation techniques and future management actions; and • financial guarantees and contractual options.  Is Safeguard 4 met?						
	Provid	e your respo	nse l	by placing an '›	c' in t	he relevant cell:	
	Y	ES		NO		Not Applicable	
	If YES, please describe in summary how statistical quality tests are used in the natural catastrophe model.						
	Item na	ame		Description a	and r	ationale	
	Insert text			Insert text			
	(Add ad	ditional rows	s as r	necessary)			
22	Safegua	nrd 5 – Use t	est a	nd governance	<u>.</u>		
	The use test reflects the IAIG's view of its risks and is used in decision-making.						
		uard 5 met?			,		
			onse I		c in t	he relevant cell:	
	Y	ES		NO		Not Applicable	



	Item name	Description and rationale		
	Insert text	Insert text		
	(Add additional rows a	as necessary)		
23	Safeguard 6 - Docum	entation standards		
	The documentation of the natural catastrophe model includes its use and other related aspects, such as:  • facilitates the supervisory review of the model;  • facilitates Senior Management's understanding; and  • recognises the weaknesses of the model.  Is Safeguard 6 met?			
	Provide your response by placing an 'x' in the relevant cell:			
	YES NO Not Applicable			
	If YES, please describ	be, in summary, the documentation that is currently available.		
	Item name	Description and rationale		
	Insert text	Insert text		
	(Add additional rows as necessary)			
24	Safeguard 7 – List of catastrophe risk sources that are not modelled			
	The IAIG recognises the limitations in the scope of their natural catastrophe model. IAIGs make a list of natural catastrophe risks specified in the ICS but not modelled, and explain why those risks are not modelled.			
	list of natural catastro	·		



	Provide your response by placing an 'x' in the relevant cell:				
		YES	NO No	ot Applicab	ole
	If YES, please list those natural catastrophe risks that are not modelled, the reason those risks are not modelled, and an assessment of the impact.				
		Item name	Description and ratio	onale	
		Insert text	Insert text		
		(Add additional rows as r	necessary)		
(	6.2	Non-insurance risk o	charges		
	Te	emplate Sheets referred to	in this section:		ICS Non-Insurance & Baseline
	Key Technical Specification sections relevant to this section 7.7 Non-Insurance Risk Charges				
_					
25	For the non-insurance entities reported as equity method investments (eg, joint ventures and joint operations) that are consolidated under GAAP, were there any reporting issues?				
		Provide your response	by placing an 'x' in the	relevant ce	ell:
	YES NO Not Applicable				
	If YES, please describe the issue that you encountered.				
	Item name Reference Description and rationale		on and rationale		
		Insert text	Insert text		



(Add additional rows as necessary)



#### 7 Tax

Template Sheets referred to in this section:	ICS Summary ICS Balance Sheet
Key Technical Specification sections relevant to this section	

26	Is there a tax componen	t to your economic capi	tal and/or stress testing models?
	Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable  If YES, please describe how the tax impacts of stresses are reflected in your model? Please include a description of the methodology used.		
	Item name	Reference	Description and rationale
	Insert text	Insert text	
	(Add additional rows as	necessary)	
27	Is the group marginal tag group effective tax rate (		id on the next dollar of income) different from the ICS?
	Provide your response YES	]	relevant cell: ot Applicable
	If YES, please provide your group marginal tax rate including a description of the methodology used to calculate the marginal tax rate on a group basis.		
	Item name	Reference	Description and rationale
	Insert text	Insert text	



(Add additional rows as i	necessary)	



# 8 Additional Reporting

#### 8.1 GAAP Plus

Template Sheets referred to in this section:	ICS Summary.GAAP+
	ICS Balance Sheet.GAAP+
	Financial Instruments.GAAP+
	Tier 2 Non-Paid-Up
	ICS Insurance Risk Charges.G+
	ICS Non-Insurance & Baseline
	ICS Other Methods.GAAP+
Key Technical Specification sections relevant to this section	9.1 GAAP Plus

28	Has an amount been reported in the worksheet ICS Balance Sheet.GAAP+, table Balance sheets, Row (-) adjustments already included in other equity items?		
	Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable  If YES, please provide a description of what was included in the amount in sufficient detail to understand why the offset was necessary.  Amount  Description		
	Insert text	Insert text	
	(Add additio	nal rows as necessary)	
29	Has an amount been reported in the <i>Other</i> line in the <i>Equity</i> section of the worksheet <i>ICS Balance Sheet.GAAP+</i> ?		
	Provide your response by placing an 'x' in the relevant cell:		
	YES NO Not Applicable		



	If YES, please provide additional information on the amount so that the IAIS can determine whether that amount should be included within ICS capital resources.		
	Amount	Description	
	Insert text		
	(Add additional rows	as necessary)	
30	financial statements	eclassifications made between reported general purpose audited (GAAP) and GAAP Plus in ICS Balance Sheet.GAAP+ (table umn [7] Reclassification from GAAP)?	
	Provide your respo	nse by placing an 'x' in the relevant cell:	
	YES	NO Not Applicable	
	Plus.  Reclassifications may include, for example, any amounts that are adjusted due to changes in balance sheet presentation, netting or grossing of balances, differences in the scope of the group, or application of different consolidation methods or rules.		
	Item name	Description and rationale	
	Insert text	Insert text	
	(Add additional rows	as necessary)	
31		at the reference ICS and GAAP Plus are materially the same (and repare a separate GAAP Plus balance sheet with explicit	
	Provide your respo	nse by placing an 'x' in the relevant cell:	
	YES	NO Not Applicable	



	· ·	be the analyses performed to determine that the balances under aterially differ from the reference ICS, and specify the key factors in hination.		
	Please describe in su materiality and direction	mmary, but with sufficient detail to allow an assessment of on of impact.		
	Item name	Description and rationale		
	Insert text	Insert text		
	(Add additional rows a	as necessary)		
32	Were any GAAP Plus calculating the GAAP	specifications not followed or simplifying assumptions made in Plus Balance Sheet?		
	Provide your respon	se by placing an 'x' in the relevant cell:  NO  Not Applicable		
	If YES, please describe, for each GAAP Plus specification not followed and each simplifying assumption made, the impact of using such alternative treatment (from the specifications, or simplification) particularly if this may not be justifiable using the proportionality principle. Please provide your rationale for the approach taken.			
	Please describe in su materiality and direction	mmary, but with sufficient detail to allow an assessment of on of impact.		
	Item name	Description and rationale		
	Insert text	Insert text		
	(Add additional rows a	as necessary)		
33	U.S. GAAP Plus – W Plus?	ere there any difficulties encountered when applying US GAAP		



	Provide your response	by placing an 'x' in the relevant cell:			
	YES	NO Not Applicable			
		in summary, but with sufficient detail to allow an assessment o impact. Please list in order of difficulty.	of		
	Item Reference	Response			
	Insert text	Insert text			
	(Add additional rows as	necessary)	1		
34	IFRS GAAP Plus – Wer	re balances reported under the IFRS GAAP Plus approach?			
	Provide your response by placing an 'x' in the relevant cell:				
	YES	NO Not Applicable			
	If NO:				
	Explain what pre	evented you from reporting the data this year.			
	2. Would these issues or limitations be resolved before next year? If not, when would you expect them to be resolved?				
	3. Are there any s	simplifying assumptions or practical expedients that could Field Testing that would address these issues or limitations?	be		
	Question Reference	Response			
	Insert text	Insert text			
	1.				
	2.				
	3.				
	(Add additional rows as	necessary)			



35	IFRS GAAP Plus – If you are an IFRS reporter (regardless of whether you reported under IFRS GAAP Plus for this year's Field Testing), please review the technical specifications presenting the IFRS GAAP Plus approach.  Do you foresee any difficulties that you could encounter if you were to apply this approach to create an IFRS GAAP Plus balance sheet?			
	approach to create an ii			
	Provide your response	by placing an 'x' in the relevant cell:		
	YES	NO Not Applicable		
	If YES, please provide d any solutions that you ca	etails of any anticipated difficulties in applying this approach and an propose.		
	Difficulty identified	Explanation and proposed solution		
	Insert text	Insert text		
	(Add additional rows as	necessary)		
36	IFRS GAAP Plus – Were any simplifying assumptions or practical expedients applied in the reporting of balances under IFRS GAAP Plus for Field Testing?			
	Provide your response by placing an 'x' in the relevant cell:			
	YES	NO Not Applicable		
	KVEC.			
	If YES:			
	<ol> <li>Please describe the method used to estimate balances in accordance with IFRS 17.</li> </ol>			
	<ol> <li>Please disclose any other information that would assist in the analysis of figures.</li> </ol>			
	Question Reference	Response		
	Insert text	Insert text		
	1.			



	2.		
	(Add additional rows as	necessary)	_
37	IFRS GAAP Plus (Use of solvency reporting) – Were figures from solvency reporting adapted to approximate IFRS 17 figures for the purpose of GAAP Plus reporting?		
	Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable  If YES:  1. Please describe, for each adaptation made, the impact of using such alternative treatment (from the specifications) particularly if this may not be justifiable using the proportionality principle.  2. Please summarise, but with sufficient detail to allow an assessment of materiality and direction of impact, your rationale for the approach taken.  3. Please provide details of any expected sources of material difference between IFRS		
	17 and solvency rep	orting that have not been adjusted.  Response	
	Insert text	Insert text	
	1.		
	2.		
	3.		
	If NO, please provide details of any expected sources of material difference betwe IFRS 17 and solvency reporting that have not been adjusted.		
38	significant differences in	Liabilities) – Were there, or do you expect there to be, the way that future cash flows are estimated between IFRS RS 17) and the reference ICS?	
	Provide your response	by placing an 'x' in the relevant cell:	
	•		



	YES	NO	Not Applicable
	<ul><li>materiality for each in</li><li>Contract Bour</li><li>Overhead exp</li></ul>	npacted product se ndaries penses	these differences and if possible a sense of the egment. Examples may include:
	Item Reference	Response	
	Insert text	Insert text	
	(Add additional rows	as necessary)	
39	you expect there to be remaining coverage of 17) and the reference	e, significant differ ash flows are esti ICS?	or Remaining Coverage) – Were there, or do ences in the way that future non-life liability for mated between IFRS GAAP Plus (applying IFRS er (or not) you are using the premium allocation
	Provide your respon	NO	x' in the relevant cell:  Not Applicable
	If YES, please describe the driver(s) of these differences and, if possible, a sense materiality for each impacted product segment. Examples might include:  Discounting Contract boundaries Overhead expenses Level of aggregation used to estimate fulfilment cash flows		
	Item Reference	Response	
	Insert text	Insert text	



	(Add additional rows as necessary)		
40	IFRS GAAP Plus (Non-Life Claims) – Were there, or do you expect there to be, significant differences in the way future non-life claim cash flows are estimated between IFRS GAAP Plus (applying IFRS17) and the reference ICS?		
	Provide your response by placing an 'x' in	the relevant cell:	
	YES NO	Not Applicable	
	If YES, please describe the driver(s) of these materiality for each impacted product segme  Discounting Contract boundaries Overhead expenses Level of aggregation used to estimate	ent. Examples might include:	
	Item Reference	Response	
	Insert text	Insert text	
	(Add additional rows as necessary)		
41	IFRS GAAP Plus – Did you develop or are y calculating a discount rate or curve for purpo Does this differ from your currently expected	oses of implementing IFRS GAAP Plus?	



1. 2. 3. 4. 5. 6. 7.	Did you, or will will be applied a Did you, or will y rate/curve? If top-down, des return implicit in or may be determ (e.g. what was despected default bottom-up, desliquidity premium or may be, consi What was consi Did you, or do you How is that rate When does it be Describe the test	idered to be the observable period (last liquid point)? ou intend to, use a spot rate or a forward rate for the ultimate ra determined?
a	construction diff	<del>-</del>
	ation Deference	Decrease
Ques	stion Reference	Response
		Response Insert text
Ques		•
Ques		•
Ques Inser 1. 2.		Insert text



42	IFRS GAAP Plus – Have you developed, or are you developing a methodology for calculating a risk adjustment for purposes of implementing IFRS 17?		
	Provide your response YES	by placing an 'x' in the relevant cell:  NO Not Applicable	
	<ol> <li>What method was o rationale for choosin</li> <li>What time period wa period?</li> <li>What risks were or n</li> <li>What level of aggree</li> <li>How was or will reins</li> <li>Did you, or do you in</li> <li>How did or will you owhat was the level?</li> <li>How did or would th ICS?</li> <li>For those products Approach, describe</li> <li>If applicable, how do</li> </ol>	your methodology including:  r may be used (e.g. VaR, TVaR, Cost of Capital) and what is the g this method?  Is or may be used and what is the rationale for choosing that time may be captured in your non-financial risks?  Igation was or may be used?  Is urance be applied or addressed?  Intend to, incorporate a diversification effect, if so, please describe. In the determine your confidence level to develop a risk adjustment and the erisk adjustment differ from the MOCE defined in the reference for which you used, or intend to use, the Premium Allocation how/if the risk adjustment would be calculated.  The property of the premium Allocation how/if the risk adjustment differ from the risk margin in the liction (eg Solvency II)?	
	Question Reference	Response	
	1. 2. (Add additional rows as	Insert text  necessary)	
43	IFRS GAAP Plus – Have you developed a policy for determining portfolio allocation for purposes of implementing IFRS 17?		
	Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable  If YES, Please describe this methodology including:		
	ii i Lo, i loado dedelibe	and meanedday moldanig.	



	segments? Please d 2. Is or will the portfol	allocation under IFRS 17 be more or less granular than the ICS escribe any material differences. io allocation under IFRS 17 be different from what you have jurisdiction's solvency regime? Please describe.		
	Question Reference	Response		
	Insert text	Insert text		
	1.			
	2.			
	(Add additional rows as	necessary)		
	If NO, please provide a concluding on assign	discussion of what you are currently considering and the timeline ing/defining portfolios.		
44	IFRS GAAP Plus – Did (PAA) to any products?	you or do you intend to apply the Premium Allocation Approach		
		PAA to any life products, please indicate this separately.		
	Provide your response by placing an 'x' in the relevant cell:			
	YES	NO Not Applicable		
	If YES, please indicate woon the GAAP Plus Balan	what portion of liabilities were reported on an undiscounted basis ce Sheet.		
	Item name	Reported amount		
	Insert text	Insert text		
	(Add additional rows as necessary)			
45	IFRS GAAP Plus – Did period greater than one	you or will you apply the PAA to any contracts with a coverage year?		



	Provide your response by placing an 'x' in the relevant cell:		
	YES	NO Not Applicable	
	15.VEO 1 1 11 11 11 11 11 11 11 11 11 11 11 1		
	If YES, please describe	the products and the rationale for applying the PAA.	
	Item name	Description and rationale	
	Insert text	Insert text	
	(Add additional rows as	necessary)	
46	IFRS GAAP Plus – Have and IFRS 9?	e you developed a timeline for the implementation of IFRS 17	
	Provide your response	by placing an 'x' in the relevant cell:	
	YES NO Not Applicable  If YES:		
	If you have not submitted an IFRS GAAP Plus balance sheet for Field Testing, do that timeline allow for preparation of a balance sheet reflecting each of IFRS 17 a IFRS 9, perhaps with some simplifying assumptions, for the Field Testing of GAAP Plus next year?		
	2. Can you provide any additional commentary that would explain possible limitations to providing a balance sheet reflecting IFRS 17 and IFRS 9 for next year?		
	Question Reference	Response	
	Insert text	Insert text	
	1.		
	2.		
	(Add additional rows as necessary)		



	If NO, please explain the issues that would prevent you from submitting a balance sheet reflecting new accounting rules for next year's data collection.				
47	China GAAP Plus – Did approach?	d you have any	difficulti	ies in applying the China GAAP Plus	<u>1</u>
	Provide your response	by placing an 'x	x' in the	e relevant cell:	
	YES	NO	N	Not Applicable	
	<ul><li>If YES:</li><li>1. Can you explain the reason for the difficulty?</li><li>2. Do you have any suggestions that would help to resolve the difficulty or clarif</li></ul>				e
	technical specification	ons?			
	Question Reference	Response			
	Insert text	Insert text			
	1.				
	2.				
	(Add additional rows as	necessary)			
48	AOCI adjustment – Did you have any difficulties in applying the AOCI adjustment?				
	Provide your response	by placing an 'x	x' in the	e relevant cell:	
	YES	NO	N	Not Applicable	
	If YES, can you exp     Do you have any set technical specification.	uggestions that		difficulty? help to resolve the difficulty or clarify the	е



	(Add additional rows as necessary)			
	Question Reference	Response		
	Insert text	Insert text		
	1.			
	2.			
	If NO, please explain v	why this segregation was not performed.		
49	Do you have any sugg Specifications?	ested improvements or refinements to the GAAP Plus Technical		
	Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable  If YES, please specify the improvement and the rationale for its relevance to the Field Testing analysis.  Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact.			
	Item name	Description and rationale		
	Insert text	Insert text		
	(Add additional rows as necessary)			
50	Do you have further comments regarding this section?  Where appropriate, this includes comments on data, additional relevant data, and/or calculations that you consider relevant to the Field Testing analysis (that is, have the potential to have a material impact on any conclusions reached based on the data and/or its analysis).			



	Provide your response by placing an 'x' in the relevant cell:							
	YES	NO N	ot App	licable				
	If YES, please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description as well as rationale for its relevance to the Field Testing analysis.							
	Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact.							
	Item name	Reference	Desc	cription and rationale				
	Insert text	Insert text						
	(Add additional rows as necessary)							
<u>                                       </u>								
8.1.1	8.1.1 Reconcilations							
	Reconciliations: Life Insurance Liabilities - GAAP Plus to MAV							
Templa	Template Sheets referred to in this section: ICS Balance Sheet.GAAP+							
Key Te	Key Technical Specification sections relevant to this section 9.1 GAAP Plus			9.1 GAAP Plus				
51	Reconciliation of life insurance liabilities GAAP Plus to MAV includes two user- defined columns to report any material adjustments required to move from GAAP Plus to MAV excluding changes to contract boundaries, cash flow projections and discounting. Were these columns utilised?							
	Provide your response by placing an 'x' in the relevant cell:							
	YES NO Not Applicable							
	If YES, please provide a description for the adjustment amounts reported in each column.							



	Item name	Description and rationale					
	Insert text	Insert text					
	(Add additional rows a	as necessary)					
52	Reconciliation of life insurance liabilities GAAP Plus to MAV includes a column labelled <i>other</i> to report any additional adjustments required to move from GAAP Plus to MAV excluding changes explicitly reported in previous columns. Was this column utilised?						
	Provide your response by placing an 'x' in the relevant cell:						
	YES NO Not Applicable						
	If YES, please provide a description for the amounts reported.						
	Item name	Description and rationale					
	Insert text	Insert text					
(Add additional rows as necessary)							
53	Do you have further comments regarding this section?						
	Where appropriate, this includes comments on data, additional relevant data, and/or calculations that you consider relevant to the analysis (that is, have the potential to have a material impact on any conclusions reached based on the data and/or its analysis).						
	Provide your response by placing an 'x' in the relevant cell:						
	YES	YES NO Not Applicable					
	If YES, please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description as well as rationale for its relevance to the analysis.						



	Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact.							
	Item name		Reference		Des	scription and rationale		
	Insert text	ert text Insert text						
	(Add additional rows as necessary)							
Reconciliations: Non-Life Insurance Liabilities - GAAP Plus to MAV								
Templ	Template Sheets referred to in this section: ICS Balance Sheet.GAAP+				ICS Balance Sheet.GAAP+			
Key Te	/ Technical Specification sections relevant to this section 9.1 GAAP Plus				9.1 GAAP Plus			
54	Did you report any amount in the Other columns for the premium liability reconciliations?							
	Provide your response by placing an 'x' in the relevant cell:							
	YES	YES NO Not Applicable			elicable			
	If YES, please describe all the amounts reported as part of <i>Other</i> in each table, provide the rationale supporting your adjustments, and indicate the impact of adopting your adjustments.  Please describe in summary, but with sufficient detail to allow an assessment of materiality (Please express the amounts as a % of Total Assets) and direction of impact.							
	Table	Item nar	ne	Desc	riptio	on and rationale		
	GAAP to MAV Insert text GAAP to		xt	Inser	Insert text			
	GAAP Plus							
	GAAP Plus to MAV							
	(Add additional ı	(Add additional rows as necessary)						
55	Do you have any other comments on the premium liability reconciliations?							



	Where appropriate, this includes comment on data, additional relevant data, and/or calculation that you provide which you consider relevant to the analysis (that is, have the potential to have a material impact on any conclusions reached based on the data and/or its analysis).			
	Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable			
	If YES, please specify the item or issue and discuss it and the rationale for its relevance to the analysis.			
	Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact.			
	Item name	Description and ra	tionale	
	Insert text	Insert text	Insert text	
	(Add additional r	dd additional rows as necessary)		
56	Did you report any amounts in the Other columns for the claim liability reconciliation?			
	Provide your response by placing an 'x' in the relevant cell:			
	YES NO Not Applicable			
	If YES, please describe all the amounts reported as part of <i>Other</i> in each table, provide the rationale supporting your adjustments, and indicate the impact of adopting your adjustments.			
	Please describe in summary, but with sufficient detail to allow an assessment of materiality (Please express the amounts as a % of Total Assets) and direction of impact.			
	Table	Item name	Description and rationale	
	GAAP to GAAP Plus	Insert text	Insert text	
	GAAP Plus to MAV			



	(Add additional rows as necessary)		
57	Do you have further comments regarding this section?  Where appropriate, this includes comments on data, additional relevant data, and/or calculations that you consider relevant to the analysis (that is, have the potential to have a material impact on any conclusions reached based on the data and/or its analysis).		
	Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable  If YES, please specify the item or issue, including a reference to the Technical Specifications or Template, and provide a description as well as rationale for its relevance to the analysis.  Please describe in summary, but with sufficient detail to allow an assessment of materiality and potential impact.		
	Item name Reference Description and rationale		
Insert text		Insert text	
	(Add additional rows as necessary)		



#### 8.2 Internal Models

Template Sheets referred to in this section:	ICS Other Methods
Key MP Technical Specification sections relevant to this section	9.2.1 Internal Models

The purpose of this section is to enable IAIGs to provide supplementary qualitative information (with respect to the quantitative data submission) to support the assessment of the appropriateness of the use of internal models for the reference ICS. This will facilitate a better understanding of:

- a. The reasons for differences in outcomes between the ICS standard method and risk charges determined by internal models at the same calibration level; and
- b. The nature and scope of application of internal models used by IAIGs

58	Do any of the risk charges calculated using a VaR 99.5% over a one-year time horizon (in 9.2 Other methods) differ materially from the equivalent ICS risk charges determined according to the ICS standard method?		
Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable			
	If YES, please quantify and outline the key drivers of any material differences for each risk. P also outline any material differences in your definition of each risk compared to that used by t IAIS.		
	Please describe in summary, but with sufficient detail to allow an assessment of materiality a direction of impact.		
	Risk  Key drivers of differences between IAIG's reported capital amount regulatory purposes and ICS standard method risk charges. Pleaso include outline of any material differences in the definitions risks.		
	Mortality risk	Insert text	
Longevity risk  Morbidity/Disability risk			
	Lapse risk		



	Expense risk	
	Premium risk	
	Claims reserve risk	
	Catastrophe risk	
	Interest Rate risk	
	Non-default Spread risk	
	Equity risk	
	Real Estate risk	
	Currency risk	
	Asset Concentration risk	
	Credit risk	
	Operational risk	
	(Add additional rows as ne	ecessary)
59	Did you report other risks	not captured by the ICS?
	Provide your response by placing an 'x' in the relevant cell:	
	YES	NO Not Applicable
		ose risks and the materiality of each risk if more than one risk is e provide the rationale for modelling these risks.
	Risk name	Description and rationale
	Insert text	Insert text
	(Add additional rows as ne	ecessary)



60	Does the ICS standard method cover risks that are not included in your internal economic capital model(s)?		
	Provide your response by placing an 'x' in the relevant cell:		
	YES	NO Not Applicable	
	If VEC places explain why	, those risks are not explicitly modelled, and how this is addressed	
		y those risks are not explicitly modelled, and how this is addressed.	
	Please describe in summa direction of impact.	ary, but with sufficient detail to allow an assessment of materiality and	
	Risk name	Description and rationale of why the risk is not modelled	
	Insert text	Insert text	
	(Add additional rows as necessary)		
61	For the actual internal model results where the risk measure and/or confidence interval differ from		
	99.5% VaR over a one-year time horizon, please detail the reasons why a different target calibration is used and outline any adjustments used when providing data at 99.5% VaR over a one-year time		
	horizon.		
	Please describe in summary, but with sufficient detail to allow an assessment of materiality and		
	direction of impact.		
	Item where different	Reasons and adjustments when providing data using same calibration	
	from ICS calibration	as ICS	
	Insert text	Insert text	
	(Add additional rows as ne	ecessary)	
62	Where you have indicated	the results come from a model whose use has been approved by a	
	supervisory authority, please provide details and scope of the approval – has the approval been		
	granted by the group-wide supervisor, a single legal entity supervisor or a supervisory college?		



	Model approved	Details of the approval	
	Insert text	Insert text	
	(Add additional rows as ne	ecessary)	
63	•	ication benefits in worksheet 9.2 Other methods and demonstrate that it d to provide a short description of the dependency modelling.	
	Difference	Description of difference	
	Insert text	Insert text	
	(Add additional rows as ne	ecessary)	
64	Considering the risk profile of your group, is there any area for which the ICS standard method does not appropriately capture the risk profile of your group and for which an internal economic capital modelling approach would be more appropriate?		
	Provide your response by placing an 'x' in the relevant cell:		
	YES	NO Not Applicable	
	If YES, please describe why an internal economic capital modelling approach would capture your risk profile more appropriately in the context of a consistent assessment of risk needed for the ICS.		
	Item name	Description and rationale	
	Insert text	Insert text	
	(Add additional rows as necessary)		



# 9 Supplementary Information

### 9.1 Commercial Mortgages

Template Sheets referred to in this section:	Commercial Mortgages	
Key MP Technical Specification sections relevant to this section	10.4 Commercial Mortgages	

With a view to potentially refine the ICS calibration of Credit risk factors for commercial mortgages, the IAIS is seeking to continue its collection of information on the commercial mortgage loan portfolios of IAIGs

65	Portfolio Performance: By Cohort Level – Annual Defaults	
	For average LTV, please clarify how LTV is measured (eg on the basis of LTV at underwriting or a recent property/collateral appraisal, etc.)	
	Description	
	Insert text	
66	Portfolio Performance: By Cohort Level – Annual Defaults	
	For average DSCR, please clarify whether DSCR is at loan underwriting or the reported DSCR.	
	Description	
	Insert text	
67	Portfolio Performance: By Cohort Level – Annual Defaults	
	Please describe how LGD is measured, and indicate whether the average is weighted by loan or by exposure.	
	Description	
	Insert text	
68	Portfolio Performance: By Cohort Level – Annual Defaults	
	Please describe how default is measured.	
	Tribude describe new default to modernou.	



	Description		
	Insert text		
69	Location of risk: Plea	se elaborate on any risk-sharing arrangements in place.	
	Description		
	Insert text		
70	<ul> <li>Business model: Plea</li> <li>Underwriting</li> <li>Loan objectiv</li> <li>Risk mitigatio</li> <li>Other feature</li> </ul>	ves on measures	
	Item	Description	
	Underwriting practices	Insert text	
	Loan objectives	Insert text	
	Risk mitigation measures	Insert text	
	Other features	Insert text	
71	the ICS, it is necessareview and analysis.  Please indicate whet accessible to the IAIS publicly disclosed in the ICS.	a inputs: As the IAIS looks to the monitoring period and further refinement of ary that any data underlying ICS risk calibrations be readily available for the data underlying your commercial mortgage loan portfolio would be and whether it can be included in aggregate anonymised results that are future IAIS papers, describing the calibration methodologies employed within g data be accessible to the IAIS?	



	Provide your response by placing an 'x' in the relevant cell:		
	YES NO Not Applicable		
	If NO, please explain.		
	Explanation		
	Insert text		
72	Can the underlying data be included in aggregate anonymised results that are publicly disclosed in future IAIS papers?		
	Provide your response by placing an 'x' in the relevant cell:		
	YES NO Not Applicable		
	If NO, please explain.		
	Explanation		
	Insert text		



# 9.2 Segmentation of Investments

Template sheet(s) referred to in this section:	Inf.Summary
	Inf.Infrastructure
	Inf.Loans and bonds
	Inf.Strategic equity
Key Technical Specification section(s) relevant to this section	10.5 Segmentation of Investments

73	Do you consider that the proposed segmentation of infrastructure investments is risk-relevant and easy to implement?		
	Provide your response by placing an 'x' in the relevant cell:		
	YES	NO	Not Applicable
	If NO, please elaborate of	on the aspects you t	hink are not risk-relevant or easy to implement.
	Item name	Description and ra	tionale
	Insert text	Insert text	
	(Add additional rows as	necessary)	
74	Did you have any difficul	ty interpreting the de	efinitions provided for infrastructure investments?
	Provide your response by placing an 'x' in the relevant cell:		he relevant cell:
	YES	NO	Not Applicable
	If YES, please describe	those difficulties with	n sufficient detail.
	Item name	Description	
	Insert text	Insert text	
	(Add additional rows as	necessary)	
75	Have you considered other key factors in determining whether an investment is strategic by nature?		
	Provide your response	by placing an 'x' in t	he relevant cell:
	YES	NO	Not Applicable



	If YES, please describe those key factors in sufficient detail.			
	Item name	Description and rationale		
	Insert text	Insert text		
	(Add additional rows as I	necessary)		
76	Have you identified / developed methodologies you could use to demonstrate the lower volatility of your strategic equity investments?			
	Provide your response	by placing an 'x' in the relevant cell:		
	YES	NO Not Applicable		
	If YES, please describe t	hose methodologies in sufficient detail.		
	Item name	Description and rationale		
	Insert text	Insert text		
	(Add additional rows as I	necessary)		
77	Did you experience any data challenge or issue when filling in the Template for this supplementary data collection?			
	Provide your response	by placing an 'x' in the relevant cell:		
	YES	NO Not Applicable		
	If YES, please describe those difficulties with sufficient detail.			
	Item name	Description		
	Insert text	Insert text		
	(Add additional rows as necessary)			



### 10 Self-assessment Template for Internal Models

IAIGs participating in the additional reporting for internal models should complete and submit the self-assessment template, which assesses the degree of compliance with the list of prerequisites.

The scope of application of internal models is limited to the calculation of the ICS capital requirement and not to other areas of the ICS such as capital resources or valuation (eg MAV). Therefore, the development of internal models is meant to introduce only an alternative calculation of the ICS capital requirement, while the valuation of the assets and liabilities of the IAIG would continue to be calculated according to the methods set out by the IAIS. However, the IAIS expects convergence between the valuation basis embedded in the internal model and the valuation basis for the ICS during the monitoring period.

Prerequisite 1: Description of the scope of application of internal models

IM1	Prerequisite 1 – Description of the scope of application of internal models				
	IAIGs must describe the scope of application of their internal model (ie the perimeter of the internal model's calculation).				
	Is Prerequisite 1 met?				
	Provide your response by	y placing an 'x' in the relevant cell:			
	YES	NO Not Applicable			
	If Yes, please describe the	e scope of application of the internal model.			
	Description item	Description rationale			
	Insert text Insert text				
	(Add additional rows as ne	ecessary)			
IM2	If Prerequisite 1 is met, two possible approaches are considered for the additional reporting of internal model results during the monitoring period. Do you use a full internal model?				
	Provide your response by placing an 'x' in the relevant cell:				
	YES	NO Not Applicable			



	If No, please describe which type of partial internal model you use.						
	Please describe in summary, but with sufficient detail to allow an assessment of the perimeter of the						
	internal model.						
	Partial model type	Description					
	Partial – One or more risk charges of the ICS standard method capital requirement	Insert text if this partial model type is used					
	Partial – One or more sub-risk charges of the ICS standard method capital requirement	Insert text if this partial model type is used					
	Partial – One or more risk charges or sub-risk charges not captured by the ICS standard method capital requirement	Insert text if this partial model type is used					
	Partial –Only one or more major business units or legal entities	Insert text if this partial model type is used					
	Other model structure	Insert text if this partial model type is used					
	(Add additional rows as ne	ecessary)					
IM3	Do you use the partial inte risk categories?	rnal model for calculation of risk charges in any of the below mentioned					
	Provide your response by	y placing an 'x' in the relevant cell:					
	YES	NO Not Applicable					
	If YES, please describe in below mentioned risk cate	summary, how the internal model is used to calculate risk charges in gories.					
	Risk category	Description of the usage					
	Mortality risk						



Longevity risk	
Morbidity/Disability risk	
Lapse risk	
Expense risk	
Premium risk	
Claims reserve risk	
Catastrophe risk	
Interest Rate risk	
Non-default Spread risk	
Equity risk	
Real Estate risk	
Currency risk	
Asset Concentration risk	
Credit risk	
Operational risk	

#### **Prerequisite 2: Validation**

#### IM4 Prerequisite 2: Validation

Describe the validation process detailing the process and the scope at different stages, segment of the model, detailing the departments involved and the periodicity of the validation and the tools used (eg benchmarking).

Explain how the validation process ensures that the model remains fit for capital purposes in changing circumstances against the criteria of the statistical quality test, calibration test and use test.

Demonstrate that the model has been independently validated (externally or internally) from those who develop, change, update, run and use the model.

Is Prerequisite 2 met?



	Provide your response by placing an 'x' in the relevant cell:						
	YES	NO	Not Applie	cable			
	If Yes, please describe the validation process of the internal model.						
	Description item	Descr	iption rationale				
	Insert text	Insert	Insert text				
	(Add additional rows	s as necessai	у)				
IM5	If Prerequisite 2 is m	net, please, p	rovide details of the va	llidation process in the	e table below.		
	Item	Is the validation policy formalised in the following areas?	Is the validation done?	What is the periodicity of the validation? (Monthly/ Quarterly/ Biannually/ Annually/ Ad hoc/ Other)	Description of the scope of the validation		
	Development	Yes/No	Internally/Externally				
	Parameterisation	Yes/No	Internally/Externally				
	Results	Yes/No	Internally/Externally				
	Model change	Yes/No	Internally/Externally				
	Expert judgement	Yes/No	Internally/Externally				
	Auditing	Yes/No	Internally/Externally				
	(Add additional rows	s as necessai	y)				
IM6	If Prerequisite 2 is met, please provide in the table below information on the outstanding validation findings, if any.						



	Validation finding	Description of the finding		
	Insert text	Insert text		
	(Add additional rows as	necessary)		
	I			
	Prerequisite 3: Sign	n-off of the Board of Directors of the IAIG		
IM7	Prerequisite 3: Sign-off o	f the Board of Directors of the IAIG		
	This prerequisite aims to ensure that there is ownership of the internal model by the Board of Directors and that the model is compliant with the validation process inscribed in the governance of the internal model. Moreover, ICP 17 recommends a certain level of engagement by the Board of Directors concerning the internal models as part of the use test.  Is Prerequisite 3 met?			
	Provide vour response	hy placing an 'x' in the relevant cell:		
	Provide your response by placing an 'x' in the relevant cell:  YES  NO  Not Applicable			
	If NO, please explain who	ether a change is planned, and the expected timeline.		
	Comment name	Comment description		
	Insert text	Insert text		
	(Add additional rows as necessary)			
	Prerequisite 4: Stati	istical quality test		
IM8	Prerequisite 4: Statistical quality test			
	Building on ICP 17.4 IAIGs need:			



	" to conduct a 'statistical quality test' which assesses the base quantitative methodology of the internal model, to demonstrate the appropriateness of this methodology, including the choice of model inputs and parameters, and to justify the assumptions underlying the model"; and provide evidence  " that the determination of the regulatory capital requirement using an internal model addresses the overall risk position of the insurer and that the underlying data used in the model is accurate and complete".  Is Prerequisite 4 met?			
	Provide your response b	y placing an 'x' in the relevant cell:		
	YES	NO Not Applicable		
	If YES, please describe in	summary on how statistical quality tests are used in the internal model.		
	Statistical quality test	Description of the test		
	Insert text	Insert text		
	(Add additional rows as ne	ecessary)		
IM9	Do you use expert judgement in the statistical quality tests?			
	Provide your response b	y placing an 'x' in the relevant cell:		
	YES	NO Not Applicable		
	Please describe in summa	ary the areas where expert judgement is predominantly used.		
	Model area	How the expert judgement is used		
	Insert text	Insert text		
	(Add additional rows as necessary)			
IM10	Do you use external data in the statistical quality tests?			



	Pro	Provide your response by placing an 'x' in the relevant cell:				
	YES NO Not Applicable					
		I		I		ı
	Please describe in summary which external data is predominantly used for which areas. Eg Intererate data for interest rate risk, claims data for benchmarking, probabilities of default for credit risk, etc.					
Data used Part of the model where it is applied						where it is applied
	Insert text		Insert text	Insert text		
	(Ada	additional rows	s as i	necessary)		
IM11	Do y	ou use an exter	nal/v	endor model in	the	statistical quality tests?
	Provide your response by placing an 'x' in the relevant cell:					
	YES NO Not Applicable				Not Applicable	
	Please describe in summary the areas /risk categories where an external/ vendor model is predominantly used.					
	Ris	k category		Details of the internal mod		ernal/vendor model and how it is integrated into the
	Cat	t model		Insert text		
		onomic Scenarionerator	)			
	(Ada	additional rows	s as i	necessary)		
IM12	Were	e there any maj	or mo	odel changes in	the	previous 5 years?
	Pro	vide your respo	nse	by placing an '›	c' in t	he relevant cell:
		YES		NO		Not Applicable



	Please describe in summary the model changes in the previous 5 years.					
	Model change	Description of the change and process related to the change				
	Insert text	Insert text				
	(Add additional rows as ne	cessary)				
IM13	Do you use statistical meth	nods (deterministic or stochastic) to aggregate risks?				
	Provide your response by	/ placing an 'x' in the relevant cell:				
	YES	NO Not Applicable				
	Please describe how risks are aggregated, the steps where diversification effects are upossible, quantify these effects. Please give a justification why they are adequate. The should address if tail dependencies are explicitly modelled and whether scenarios are Aggregation /  Description					
	diversification	Legant tout				
	Insert text	Insert text				
	(Add additional rows as ne	cessary)				
	Prerequisite 5: Calibra	ation test				
IM14	Prerequisite 5: Calibration test					
	Building on ICP 17.15 the IAIG should " conduct a 'calibration test' to demonstrate that the regulatory capital requirement determined by the internal model satisfies the specified modelling criteria".					
	Does the existing model ha	ave a specific calibration test?				



	Provide your response by placing an 'x' in the relevant cell:					
	YES	Not Applicable				
	_					
	If YES, please describe in summary, but with sufficient detail how you calculate the calibration test.					
	Calibration test Description of the test					
	Insert text	Insert text				
	(Add additional rows as nee	cessary)				
IM15	Can the existing model be	calibrated at a 99.5% VaR over a one-year time horizon?				
	Provide your response by placing an 'x' in the relevant cell:					
	YES NO Not Applicable					
	If NO, please describe in su over a one-year time horizo	ummary the differences between your internal model and a 99.5% VaR				
	Comment	Description				
	Insert text	Insert text				
	(Add additional rows as nee	cessary)				
IM16	Some risks, such as basis risk, comprise a blend of different risk components. Are such risks captured in your model?					
	Provide your response by	placing an 'x' in the relevant cell:				
	YES	Not Applicable				



model.

	Comment	Description		
	Insert text	Insert text		
	(Add additional rows as nec	ressary)		
	I			
	Prerequisite 6: Use tes	t and governance		
IM17	Prerequisite 6: Use test and	governance		
	Building on ICP 17.16, IAIG	's need:		
	" to fully embed the int strategy and operational pro	ernal model, its methodologies and results, into the insurer's risk ocesses (the 'use test')";		
	their "Board and Senior management to have overall control of and responsibility for the construction and use of the internal model for risk management purposes, and ensure sufficient understanding of the model's construction at appropriate levels within the insurer's organisational structure". In particular, they would need to provide evidence that the insurer's Board and Senior management understand the consequences of the internal model's outputs and limitations for risk and capital management decisions; and			
	" to have adequate governance and internal controls in place with respect to the internal model"			
	Is Prerequisite 6 met?			
	Provide your response by placing an 'x' in the relevant cell:			
	YES N	O Not Applicable		
	If YES, please describe in summary, how the use test is met.			
	Use test	Description		
	Business planning	Insert text		
	Mergers and Acquisitions			

If YES, please identify and provide an explanation as to how they are reflected and quantified in the



	Reinsurance	
	Investment	
	Underwriting	
	Risk Management	
	Capital Management (assessment and allocation)	
	Performance Management	
	(Add additional rows as nec	ressary)
IM18	Please describe the model of	governance and internal controls at different stages of the model.
	Model stage	Description
	Model development	Insert text
	Model deployment	
	Model implementation	
	Model usage	
	Model validation	
	Model changes	
	Data quality	
	Use test checking	
	Roles and relationships of different governance	
	(Add additional rows as nec	ressary)



# **Prerequisite 7: Documentation standards**

IM19	Prerequisite 7: Documentat	ion standards
	internal model, including an The documentation should requirements for internal m	AIG should " document the design, construction and governance of the outline of the rationale and assumptions underlying its methodology". be sufficient to demonstrate compliance with the regulatory validation odels, including the statistical quality test, calibration test and use test.
	Is Prerequisite 7 met?	
	Provide your response by	placing an 'x' in the relevant cell:
	YES	Not Applicable
	If YES, please describe in s	summary, how Prerequisite 7 is met.
	Documentation type	Description
	Insert text	Insert text
	(Add additional rows as ned	cessary)
IM20	Please describe the model	documentation process at different stages of the model.
	Model stage	Description
	Model development	Insert text
	Model deployment	
	Model implementation	
	Model usage	
	Model validation	



Model changes	
Data quality	
Use test checking	
Roles and relationships of units responsible for documentation	

## **Prerequisite 8: Absence of cherry-picking (for partial models)**

ropriate as they our control of the	nse by placing an 'x' in the relevant cell:
ovide your respor	nse by placing an 'x' in the relevant cell:
7	
YES	NO Not Applicable
] [	NO Not Applicable
ES, please descri	ibe in summary, how Prerequisite 8 is met.
omment	Description
sert text	Insert text
_	



# Prerequisite 9: The resulting ICS capital requirement more appropriately reflects the risk profile of the insurer (for partial models)

IM22	Prerequisite 9: The resulting the insurer	ng ICS capital requirement more appropriately reflects the risk profile of
	and why it considers that u requirements is more cons	i, "an insurer should be required to justify the limited scope of the model using partial internal modelling for determining regulatory capital sistent with the risk profile of the business than the standardised approach les regulatory capital requirements".
	YES	y placing an 'x' in the relevant cell:  NO Not Applicable
	,	summary how Prerequisite 9 is met, describing the scope of the model nces against the ICS standard formula.
	Comment	Description
	Insert text	Insert text
	(Add additional rows as ne	ecessary)

# Prerequisite 10: Explain how the partial internal model and standard method's results can be integrated (for partial models)

IM23	Prerequisite 10: Explain how the partial internal model and standard method's results can be integrated
	It is essential that the integration of the partial internal model and the standard method results is being carried out prudently and consistently to derive the overall ICS capital requirement. To this end, the IAIG should provide evidence that the partial internal model and standard method results can be integrated. This prerequisite is particularly relevant for IAIGs whose internal model construction does not follow a similar design to the standard method (eg risks have not been defined or split along similar lines to the standard method, the target criteria are different, etc.).  Is Prerequisite 10 met?



Provide your res	sponse by p	placing an 'x' in the relevant cell:
YES	NO	O Not Applicable
If VES please pro	ecent the re	esults and explain how the internal model results can be integrate
within the standar		
Comment	С	Description
Comment Insert text		Description Insert text
		·
		·
		·