Legal and General Assurance (Pensions Management) Limited

Solvency and Financial Condition Report
31 December 2020

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SUMMARY

THIS DOCUMENT

This Solvency and Financial Condition Report (SFCR) is a regulatory document as required by the Reporting part of the PRA Rulebook for Solvency II firms and Directive 2009/138/EC of the European Parliament Articles 51 and 256.

This report is prepared in respect of Legal and General Assurance (Pensions Management) Limited ('the Company', 'PMC') for the financial year ended 31 December 2020. All values are (unless otherwise stated) as at 31 December 2020.

WHO WE ARE

We are a UK-based insurance entity offering a range of investment products to both UK and international clients.

We offer clients a wide range of products and look to expand this offering as more bespoke solutions are designed in order to satisfy client needs. The size and range of our funds provide the scale and diversity that fund managers need to offer clients a complete suite of services for defined benefit schemes to support them along their de-risking journey. Additionally, the Company continues to reposition its business toward a growing defined contribution proposition, developing its product offerings and distribution models to meet the requirements of the changing marketplace.

The majority of the Company's business relates to unit-linked insurance policies provided to UK pension schemes.

Incorporated as a private limited company in March 1971, we are part of the Legal & General Investment Management (LGIM) business division and are one of the major insurance entities within the Legal & General Group (the Group).

OUR PERFORMANCE

Our key financial performance measures for the year ending 31 December 2020, together with the corresponding measures for the previous year, were:

- IFRS Operating profit before tax £240m (2019: £222m)
- Solvency II regulatory surplus of £494m (2019: £440m)
- Solvency II coverage ratio of 214% on the regulatory basis (2019: 224%)

The Company has successfully adjusted its working practices to manage the impact of the lockdowns imposed in response to the Covid-19 pandemic and has been able to continue its business operations without material disruption.

Further details on our business and performance are provided in section A.

OUR GOVERNANCE

Overview

There have been no material changes to our system of governance during the year.

The board of Legal & General Group Plc is accountable for the long-term success of the Group by setting the Group's strategic objectives and monitoring performance against those objectives. The Group and its subsidiaries operate within a clearly defined delegated authority framework. The delegated authority framework ensures that there is an appropriate level of Board contribution to and oversight of key decisions and that the day-to-day business is managed effectively.

Understanding our risk landscape

PMC is a separate legal entity within the Group, with its own board of directors responsible for acting independently to promote the success of the Company and exercise independent judgement, as required under the Companies Act 2006.

PMC's Board is responsible for setting its strategic direction and managing the business's daily operations, albeit under the high level strategic guidance of our immediate parent company Legal & General Investment Management (Holdings) Limited ('LGIMH') and our ultimate parent company Legal & General Group Plc.

Within the LGIMH group of companies, independent oversight is given to key risks. The reporting lines for these risk management activities are separate to the investment teams and are overseen by a governance framework of senior committees and, ultimately, the LGIMH Board. Risk governance for PMC is thus largely carried out under delegated authorities, but subject to PMC Board challenge and regular monitoring. In addition, PMC has operational and governance arrangements which are distinct from the other major business units within the Group.

The insurance policies that we write, the investments that we hold to meet our obligations and the environment in which we operate give rise to a broad range of risks. Our risk management framework seeks to ensure that we are only exposed to those residual risks for which we have an appetite.

Risk management framework

Our risk framework is designed to enable the Board to draw assurance that risks are being appropriately identified and managed in line with our risk appetite.

Our framework seeks to reinforce the parameters of acceptable risk taking, allowing business managers to make decisions that are consistent with our risk appetite.

We deploy a 'three lines of defence' risk governance model, whereby:

- business functions are responsible for risk taking within the parameters of our risk appetite and accountable for identifying, assessing and managing risks in line with our risk policies;
- Risk and Compliance functions led by the Chief Risk Officer provide oversight, objective challenge and guidance on risk and regulatory compliance matters; and
- Group Internal Audit provides independent assurance on the effectiveness of business risk management and the overall operation of the risk framework.

Further details on our system of governance are provided in section B.

OUR RISK PROFILE

There has been no material change in our risk profile during the year ended 31 December 2020.

Our most material risk exposures are:

- Operational and reputational risks;
- Market and broader economic conditions, including sector performance; and
- Insurance risks, i.e. lapse, expense, income

We assess on an ongoing basis the capital that we need to hold above our liabilities to meet our strategic objectives and ensure continued solvency.

In accordance with UK Government direction in March 2020 following the emergence of the Covid-19 pandemic, the majority of the workforce was moved to a remote working model. Through this period and through 2020, operation of the risk framework and standards of control have been maintained, staff could access risk management systems remotely and oversight, risk reporting and governance has continued. There has been no significant observed deterioration of the control environment, despite the business having to adapt some controls to the new reality specifically for this situation – specific control reviews have been conducted to provide comfort around this. The business continues to actively monitor the control environment and escalate issues and events where appropriate, in accordance with the existing risk framework.

The emergence during 2020 of the Covid-19 pandemic reinforces the exposure of businesses generally to the risk of operational disruption, and significant financial market volatility has been observed.

Our risk-based capital model seeks to provide a quantitative assessment of our risk exposures. It forms part of the suite of tools that we use to evaluate our strategic plans and set risk appetite. The key output from our capital model is the generation of capital requirements. We calibrate our model to ensuring that we hold sufficient capital to survive our assessment of a worse case 1-in-200 year event, equivalent to a 99.5% value at risk confidence level over one year. In terms of capital requirement, operational and insurance (lapse and expense) risks are our most significant risks.

Further details on our risk profile are provided in section C.

VALUATION FOR SOLVENCY PURPOSES

A summary of the balance sheet position as at 31 December 2020 on the Solvency II basis, together with the comparative position as at 31 December 2019, is shown in the following table.

Summary Solvency II Balance Sheet (£m)	**2020**	**2019**
Assets held for index-linked and unit-linked contracts	344,806	322,392
Reinsurance recoverables	2	2
All other assets	648	596
Total assets	**345,456**	**322,990**
Bid value of policyholder unit liabilities	344,806	322,392
Other components of Solvency II technical provisions	(681)	(524)
All other liabilities	402	327
Total liabilities	**344,528**	**322,195**
Solvency II Own Funds	**928**	**795**

Our Solvency II coverage ratio as at 31 December 2020 was 214% (2019: 224%) with eligible Own Funds of £928m (2019: £795m) and Solvency Capital Requirement (SCR) of £434m (2019: £355m).

The amount of the regulatory Minimum Capital Requirement (MCR) at that date was £195m (2019: £160m).

We do not apply any transitional measure, matching adjustment or volatility adjustment within our Solvency II calculations.

There has been no material change in the methods used in the valuation for solvency purposes during the year ended 31 December 2020. Assumptions have been reviewed and updated as part of our established annual review of relevant experience, including observed persistency, fee rates, and incurred expenses. In aggregate, the updated assumption basis has produced an increase in Own Funds which primarily reflects favourable emerging experience and expense management efficiencies compared to the previous basis.

Further details on our valuation for solvency purposes are provided in section D.

OUR CAPITAL MANAGEMENT

We aim to manage our capital resources to maintain financial strength and policyholder security. There has been no material change in our capital management during the year ended 31 December 2020.

PMC holds a significant capital surplus against its regulatory capital requirements. Our SCR is calculated using the Legal & General Group Internal Model which has received the necessary regulatory approvals.

Our Own Funds amount is entirely comprised of unrestricted basic Tier 1 items, and as such there are no ineligible own funds for the purpose of covering our capital requirements.

There have been no instances of non-compliance with the MCR or SCR at any time over the reporting period.

Further details on our capital management are provided in section E.

The Appendix contains copies of Quantitative Reporting Templates (QRTs) as required by the PRA Rulebook.

DIRECTORS' CERTIFICATE

Legal and General Assurance (Pensions Management) Limited

Financial year ended 31 December 2020

The Directors acknowledge their responsibility for the proper preparation of the Solvency and Financial Condition Report (SFCR) in all material respects in accordance with the PRA Rules and Solvency II Regulations.

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

(a) throughout the financial year to 31 December 2020, the firm has complied in all material respects with the requirements of the PRA rules and Solvency II Regulations as applicable to the firm; and

(b) it is reasonable to believe that in respect of the period from 31 December 2020 to the date of the publication of the SFCR, the firm has continued so to comply and that it will continue so to comply for the remainder of the financial year to 31 December 2021.

By Order of the Board

DocuSigned by:

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Richard Lee
Chief Financial Officer
30 March 2021

A. BUSINESS AND PERFORMANCE

A.1 BUSINESS

A.1.1 Company details

A.1.1.1 Name and legal form of the undertaking

This report is prepared in respect of Legal and General Assurance (Pensions Management) Limited ('the Company', 'PMC') for the financial year ended 31 December 2020.

The Company is a limited company incorporated in England and Wales, authorised by the Prudential Regulation Authority (PRA) and regulated by the Financial Conduct Authority (FCA) and by the PRA.

Our registered office is:

One Coleman Street
London
EC2R 5AA

A.1.1.2 Supervisory authority responsible for financial supervision

The supervisory authority responsible for financial supervision of the Company is:

Prudential Regulation Authority
20 Moorgate
London
EC2R 6DA

The Prudential Regulation Authority is also the supervisor of Legal & General Group Plc.

A.1.1.3 External auditor

The independent external auditor of the Company is:

KPMG LLP
15 Canada Square
London
E14 5GL

A.1.1.4 Qualifying holdings

The Company's issued share capital is £100,000 being 100,000 fully paid ordinary shares of £1 each.

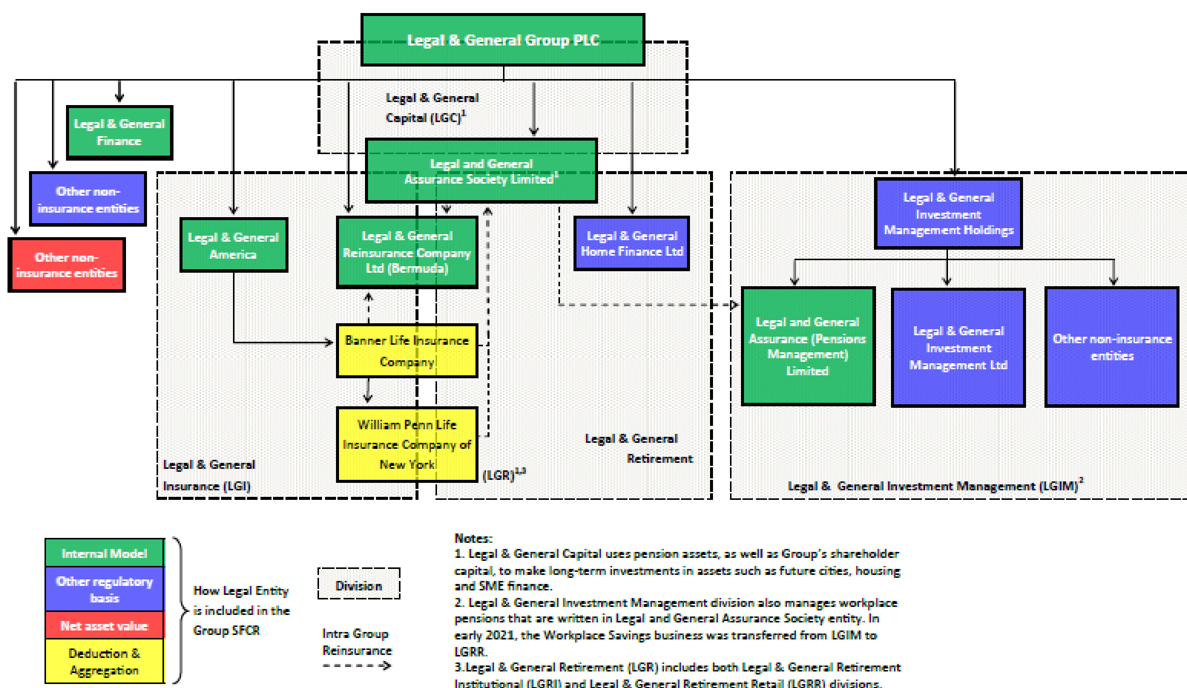
There is one class of ordinary share and all shares carry equal voting rights.

All shares and voting rights are held by the immediate parent company, Legal & General Investment Management (Holdings) Limited, which is a company incorporated in England and Wales.

The ultimate parent company is Legal & General Group Plc, which is a company incorporated in England and Wales.

A.1.1.5 Group structure

A simplified group structure is shown below.



A.1.1.6 Material related undertakings

There are no material related undertakings. The Company holds interests in certain related property vehicles which are held as assets within unit-linked funds. The total value of the equity shares held in such vehicles as at 31 December 2020 was £20m, which constitutes an immaterial proportion of the Company's total assets.

As part of assets held within unit-linked pooled funds, the Company also holds some investments in regulated structured investment vehicles which are operated by other corporate entities within the L&G Group, in particular LGIM (Ireland) Risk Management Solutions plc and LGIM Liquidity Funds plc. The investments held are to the extent needed to gain exposure to relevant assets on behalf of unit-linked policyholders, and the Company does not provide any guarantees or other support to these entities.

A.1.2 Material lines of business

The principal business of the Company is the management of assets for pension funds.

For Solvency II reporting purposes, the Company has only the following two material defined Solvency II lines of business:

- Index-linked and unit-linked insurance; and
- Life reinsurance

The Life reinsurance line of business is entirely comprised of unit-linked contracts where the policyholder is another insurance company. These policies are similar in all material respects for valuation and risk management purposes to the index-linked and unit-linked insurance line of business. As at 31 December 2020, approximately 22% of the Company's balance sheet technical provisions relate to reinsurance accepted contracts.

The Company's business predominantly relates to UK pension schemes.

A.1.3 Significant events over the reporting period

Significant financial market volatility was observed following the emergence during 2020 of the Covid-19 pandemic. In particular, the impacts of the pandemic on the UK commercial property market in March 2020 led to external independent valuers applying a material uncertainty clause to the valuations of certain of PMC's UK property fund assets. This resulted in the Company deciding to temporarily suspend the relevant property unit-linked funds in the interests of policyholder fairness until such time as the exceptional market valuation uncertainty was removed. The funds were reopened in October 2020.

In accordance with UK Government direction in March 2020, the majority of the workforce was moved to a remote working model. Through this period and through 2020, operation of the risk framework and standards of control have been maintained, staff could access risk management systems remotely and oversight, risk reporting and governance has continued. There has been no significant observed deterioration of the control environment, despite the business having to adapt some controls to the new reality specifically for this situation – specific control reviews have been conducted to provide comfort around this. The business continues to actively monitor the control environment and escalate issues and events where appropriate, in accordance with the existing risk framework.

The Company has successfully adjusted its working practices to manage the impact of the lockdowns imposed in response to the Covid-19 pandemic and has been able to continue its business operations without material disruption.

A small proportion (approximately 1%) of the Company's business relates to Ireland-based clients. The UK left the European Union on 31 January 2020 with a withdrawal agreement and a transition period for financial services agreed. This allowed the Company to continue to carry on insurance business in Ireland without the necessity of a third-country branch until the end of the transitional period on 31 December 2020. On 10 December 2020, the Withdrawal of the United Kingdom from the European Union (Consequential Provisions) Act 2020 was signed into law by the Irish President. This permits the Company to continue to administer unit linked insurance policies issued to existing Irish policyholders for a maximum period of 15 years from the 31 December 2020, and the Company is continuing to operate its existing insurance business in Ireland accordingly on that basis. The Company continues to engage with the Central Bank of Ireland on matters relating to its insurance business in Ireland.

A.2 UNDERWRITING PERFORMANCE

Since the Company prepares its financial statements in accordance with International Financial Reporting Standards (IFRS), the underwriting performance information in this section is presented on an IFRS basis. We consider the IFRS operating profit to be an appropriate measure of the underwriting performance.

IFRS operating profit before tax for the 2020 financial year was £240m (2019: £222m).

Our main source of income relates to management fees generated by assets under management. Fee rates have seen downward pressure in an increasingly competitive marketplace.

The market value of assets under management at the end of 2020 was £500bn (2019: £463bn), including segregated funds of £155bn (2019: £141bn) which do not appear on the Company's balance sheet.

Information on policyholder inflows and outflows on pooled funds are presented by Solvency II line of business in QRT S.05.01 in the Appendix of this report.

A.3 INVESTMENT PERFORMANCE

The total investment return over 2020 as shown in the Company's IFRS financial statements was £31,706m (2019: £46,144m). This comprised two elements as follows.

The vast majority of assets on the Company's balance sheet are held for unit-linked and index-linked contracts and therefore the nature of the business written is such that investment returns on these assets contribute directly to the value of policyholder units. Assets are invested in line with the fund choices made by the policyholders and the returns achieved consist of dividends, interest and other income receivable, unrealised and realised gains/losses as appropriate. The investment return over 2020 on assets held for linked contracts was £31,704m (2019: £46,142m), with investment management expenses of £159m (2019: £142m).

Shareholder assets are primarily held to provide liquidity and capital security, as distinct from targeting specific investment returns. The investment return over 2020 on the shareholder assets was £2m (2019: £2m) and is included in the overall operating profit figure shown in section A.2 above. The investment return relates to gains achieved on holdings of UK government bonds, together with interest on cash and short-term deposit holdings. The expense incurred in the investment of shareholder assets is de minimis.

All investment gains and losses are recognised in the income statement. There are no amounts recognised directly in equity.

Investments in securitisations

The Company holds investments in securitisations with a total market value of £488m as at 31 December 2020, all of which are held as assets within unit-linked funds. This represents less than 0.2% of the total assets.

A.4 PERFORMANCE OF OTHER ACTIVITIES

The Company also writes pension fund management contracts which provide investment management services on a segregated basis. The nature of the segregated contracts is such that each client retains beneficial ownership of their underlying asset portfolios, and therefore the value of those assets under management is not included on our balance sheet.

Accordingly, the investment performance information provided in section A.3 above excludes segregated contracts. For consistency with the balance sheet treatment, the expenses attributable to the management of segregated contracts are shown separately within the S.05.01 QRT (see Appendix) and amounted to £62m (2019: £54m). The corresponding fee revenue amounted to £113m (2019: £106m). The revenue and expenses associated with management of the segregated contracts is included within the operating profit shown in section A.2 above.

There have been no other significant activities undertaken.

The Company has several operating leases which are rental agreements for various properties held within certain unit-linked funds as assets for unit-linked contracts. None of the leasing arrangements are individually material to the relevant funds. There are no other leasing arrangements.

A.5 ANY OTHER INFORMATION

All material information regarding the business and performance of the Company over the financial year has been covered in the above sections A.1 to A.4 inclusive.

B. SYSTEM OF GOVERNANCE

B.1 GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE

The Board of Legal & General Group Plc is accountable for the long-term success of the Group by setting the Group's strategic objectives and monitoring performance against those objectives.

Legal & General Group is managed across business divisions rather than legal entities. PMC is an entity within the LGIM business division.

B.1.1 Structure of the PMC Board

PMC is a separate legal entity within the Legal & General Group, with its own board of directors responsible for exercising independent judgement. The PMC Board is accountable for the long-term success of the Company by setting the Company's strategic objectives, monitoring performance against those objectives and overseeing the business activities undertaken by the Company, whilst operating within the framework and overall strategy defined by the Group Board.

PMC's operational and governance arrangements are distinct from the Group's other major businesses. As a result of the corporate structuring and the operation of English company law, PMC's assets are legally and financially separated from the rest of Legal & General Group and from other entities within the Group.

The PMC Board, which meets quarterly, comprises a non-executive director (the Chair) and six executive directors, with clearly defined statements of responsibilities for both the Chair and the Chief Executive, which are reviewed as part of the annual governance review undertaken by the Board.

The Board receives the support and advice of the Company's Chief Actuary and Chief Risk Officer, who are standing attendees at all Board meetings, together with the Company Secretary and General Counsel, as well as access to independent advice.

There is a defined schedule of matters reserved for the PMC Board, which is approved and reviewed annually. The types of matters reserved for the Board include, amongst other things, matters relating to the Company's strategic plan, Board membership, delegation of authority, and declaration of dividends.

Those matters which are not reserved are delegated to the *PMC Governance Committee* (PMCGC) whose role is to exercise the responsibility of the PMC Board for ensuring that a forum for debate and decision-making is regularly convened in order that PMC's legal, regulatory and financial obligations are discharged within an appropriate governance framework. The PMCGC meets at least 10 times in a year and additionally on an ad hoc basis if required.

In addition to the matters reserved, the PMC Board has a schedule of regular agenda items which includes a report from its primary delegated committee (PMCGC), Compliance and Finance reports, Business Change report, Distribution and Client Operations report, and Fund Operations Oversight report. The PMC Board also receives relevant business updates from its other delegated committees and from various key function holders on issues impacting PMC.

Oversight of PMC's key functions is either by way of:

- Delegation to committee; either the PMCGC or an LGIMH committee
- Direct oversight via a PMC Board member who is the key function holder

Currently, where oversight is delegated to a committee, each committee includes at least one PMC board member and/or key function holder.

The LGIMH Board has also established two further sub-committees (the *LGIMH Audit Committee* and the *LGIMH Risk Committee*), whose members are Non-Executive Directors and which provide additional oversight, challenge and review of financial and risk matters for the LGIM division, including PMC. Given the significance of PMC to LGIMH, relevant PMC matters are considered by those Committees separately to matters pertaining to other LGIMH businesses, prior to recommendation to the PMC Board.

B.1.2 Key functions

B.1.2.1 Senior Manager Functions

The Company operates within the Senior Managers & Certification Regime (SMCR) for insurers, which took legislative effect from December 2018.

A framework is in place accordingly which includes identifying material risk takers, the annual certification of senior managers of prescribed functions, prescribed responsibilities, individual accountability, and the reporting of any breaches to the regulator.

B.1.2.2 Delegation of key functions

PMC delegates three key functions to LGIM Limited to undertake which are:

- Fund operations, including the pricing and valuation of assets, the unit pricing of pooled funds and the oversight of appointed third parties
- Distribution and customer operations, including the marketing of PMC's products and services, customer record keeping and client reporting
- Product management, incorporating product development and product maintenance including an appropriateness assessment

LGIMH provides resources for Risk Management, Internal Control, Compliance, Internal Audit, Finance and IT functions.

PMC retains the responsibility for the above functions with the relevant business area heads being the key function holder on behalf of PMC.

B.1.2.3 Key LGIMH committees

Certain activities are provided for the relevant PMC senior management by the following LGIMH committees:

- *Fund Manager Oversight Committee:* To ensure that the investment management activities and associated services performed by LGIM, its delegates and other fund managers are conducted in accordance with applicable regulations, the terms of the relevant governing IMA and the relevant policies and procedures;
- *Product Governance Committee:* To establish a governance structure to oversee the design and development of LGIM products; to ensure that appropriateness of pooled fund products can be evidenced and to ensure that information provided to distributors is sufficient; to oversee the review of products through the product lifecycle process;
- *Executive Risk Committee:* To ensure that the critical business, regulatory and operational risks are identified assessed and managed by the appropriate processes and to ensure compliance with the relevant regulatory controls; to ensure there are appropriate management structures and sub-committees in place to manage the identified risks and regulatory requirements;

- *LGIM Fees Committee:* A sub-committee of the Product Governance Committee to monitor, review and approve fee rates on behalf of LGIMH and its subsidiaries, subject to limits on the delegated authorities;

B.1.2.4 Key function holder oversight

Where function oversight is not delegated to a committee, the oversight function is carried out directly by the senior manager who is the key function holder. The responsible individual reports and escalates any issues to the Chief Risk Officer, the PMC Governance Committee or directly to the PMC Board as required.

In addition to the oversight provided by the LGIMH Audit Committee and the LGIMH Risk Committee, further oversight of risk management, audit and remuneration responsibilities is provided by Group Board committees, being the Group Risk Committee, Group Remuneration Committee and the Group Audit Committee.

B.1.3 Details of any material changes

No material changes in the system of governance within PMC have taken place over the reporting period.

During 2020, two additional directors were newly appointed to the PMC Board. In the period since 31 December 2020 up to the date of issuing this report, there have been no further changes to the composition of the PMC Board.

B.1.4 Remuneration policy and practices

The remuneration policy is consistent across the Legal & General Group and is designed to reward, motivate and retain high performers in line with the risk appetite of the Group. The Group Remuneration Committee is responsible for determining and approving the framework of the remuneration policy for the Group and its subsidiaries. Details can be found in the Directors' Report on Remuneration in the Legal & General Group Plc Annual Report and Accounts.

The Company itself does not have any direct employees. Staff members supporting the Company are employed and paid by either the parent company, Legal & General Investment Management (Holdings) Limited, or by an affiliate, Legal & General Resources Limited. The Company is recharged a portion of the costs incurred.

No fees are paid by the Company to the directors. As above, directors are not employees of the Company and the cost of their services to the Company are reflected in a management charge levied by the parent.

B.1.5 Material transactions

There were no material transactions between the Company and its directors or key managers or persons exercising a significant influence on the Company during the reporting period.

Under a management agreement, the Company's shareholder supplies and makes charges for administrative and staff expenses to the Company. The amount of this recharge for 2020 is £72m (2019: £78m).

The Company declared and paid £194m in dividends to its parent company during the year (2019: £199m).

B.2 FIT AND PROPER REQUIREMENTS

B.2.1 Application of Policy

Legal & General Group has in place a fit and proper policy, the purpose of which is to set out the procedures required by regulated firms within the Legal & General Group to assess the fitness and propriety of individuals who run these undertakings or who hold other key functions in them.

B.2.2 Key requirements

In summary the policy requires that each insurance regulated entity shall establish, implement and maintain documented policies and adequate procedures to ensure that all persons who are responsible for running the entity or are responsible for other key functions are at all times fit and proper.

The assessment of fitness and propriety covers the following factors:

- Honesty, integrity and reputation
- Competence and capability
- Financial soundness

B.2.2.1 Legal & General assessment procedures

In support of the Group policy, defined processes are in place to ensure that the fitness and propriety of applicants is carefully considered before an application to the regulators to grant approval is submitted. An assessment will also be made before a notification is made to the regulators in relation to the appointment of a Key Function Holder.

Legal & General will not support an application for approval or a notification if it is believed that the candidate fails to meet any element of the fit and proper test.

Each application will be looked at on its own merits, on a case-by-case basis, but the following principle generally applies to all applications:

- Has the candidate been open and honest with Legal & General and disclosed all relevant matters;

If the candidate has disclosed any incidents pertaining to their fitness and propriety, the following will be considered:

- The seriousness of the issue and the relevance to the specific role applied for;
- The passage of time since the incident occurred; and
- Whether the issue relates to an isolated incident or whether there is a pattern of adverse behaviour.

Fit and Proper Assessment criteria have been developed and each application will be considered against each criterion, regardless of the current approved status of individual. The criteria are:

- knowledge – does the individual have generic knowledge of the industry sector and specific knowledge of the firm;
- qualifications – does the individual have prerequisite or supporting relevant qualifications;
- skills – does the individual demonstrate the appropriate level of business and interpersonal skills;
- behaviour – does the individual demonstrate the appropriate attitudes and standards of ethical behaviour; and
- expertise – does the individual achieve positive and fair outcomes and meet performance standards expected of the post.

The assessment criteria are also relevant in assessing the continuing fitness and propriety of approved persons.

B.2.2.2 Maintaining Fitness and Propriety

From time to time, individuals will be required to certify that there has been no change to the information provided at the point of approval and consequently, the fitness and propriety status is unchanged.

Legal & General's Group Policies and Procedures place an obligation on approved persons to notify the Group Conduct Risk and HR Director in the event of any pending or actual criminal, civil or other disciplinary charges, judgements, petitions for bankruptcy, or other actions or disciplinary measures whatsoever, against them or any entity, body or other entity with which he/she is, or has been, associated.

Should such a notification occur, Legal & General will assess the information to decide whether the individual remains fit and proper. If the assessment ultimately concludes that the individual can no longer remain as an approved person, a notification will be made to the regulators in line with the regulatory requirements.

Legal & General's performance management process is the primary mechanism for tracking ongoing competency. Legal & General will take appropriate steps to monitor an individual's financial soundness on an ongoing basis.

B.3 RISK MANAGEMENT SYSTEM INCLUDING THE OWN RISK AND SOLVENCY ASSESSMENT

B.3.1 Risk management system

We deploy a 'three lines of defence' risk governance model, whereby:

- business functions are responsible for risk taking within the parameters of our risk appetite and accountable for identifying, assessing and managing risks in line with our risk policies and appetite;
- Risk and Compliance functions led by the Chief Risk Officer provide oversight, objective challenge and guidance on risk matters; and
- Group Internal Audit provides independent assurance on the effectiveness of business risk management and the overall operation of the risk framework.

B.3.1.1 Risk appetite

Our risk appetite defines our overall attitude to risk, and the ranges and limits of acceptable risk taking. The Group Risk Committee leads an annual review of the Group's risk appetite, assessing the continued appropriateness of our key measures and tolerances relative to the risk exposures of the Group. Additionally, as part of the annual planning cycle, assessment is made of the level of risk taking proposed in the Group plan and the capacity for risk taking within the overall appetite framework.

The Company's risk appetite is approved by the Company's Board. The regular management information received by the Board and Risk Committees includes monitoring of our actual performance and positions relative to the key targets and limits set in our risk appetite.

B.3.1.2 Risk taking authorities

The parameters of acceptable risk taking defined within the risk appetite are cascaded to business managers through divisional 'Risk and Capital Mandates', empowering managers to make decisions that are consistent with our appetite for risk.

Mandates articulate the product types and features that may be written; the assets classes that may be held; the target capital positions and ranges of earnings volatility within which the overall profile of risks should be managed; and tolerances for specific risk exposures. Activities that would result in a business operating outside agreed parameters require formal approval from the Board.

B.3.1.3 Risk policies

Risk control

We set formal policies for the management of our risks, either by consideration and adoption of a relevant Group policy if suitable or by approval of a PMC-specific policy. The policies specify our overall strategies for ensuring each risk type is managed in line with our risk appetite and the minimum control standards that should be applied in managing our significant risk exposures.

Risk mitigation

We deploy a range of risk management techniques to manage and mitigate risks, so as to control risk exposures in line with our risk limits. Our framework of controls includes documented policies and structured delegated authorities.

B.3.1.4 Risk identification and assessment

Review process

We operate a risk identification and assessment process under which we regularly consider changes in the profile of existing and emerging risks. The assessment process evaluates the risks that are inherent in our products as well as those that are presented from changes in the environments that we operate in.

Own risk solvency assessment (ORSA)

Our risk identification and assessment process forms part of our broader 'own risk and solvency assessment' process, our ongoing assessment of the risks to which we are exposed and an evaluation of the sufficiency of resources to sustain the business strategy over the horizon of the planning period.

B.3.1.5 Risk management information

Our risk management information framework is structured to report and support the review of ongoing and emerging risks and assess actual risk positions relative to the risk limits and targets that we set.

B.3.1.6 Risk oversight

The Group Chief Risk Officer, who is independent of the business line, supports the Group Board and its Risk Committee in articulating acceptable risk taking and ensuring the effective operation of our risk and capital framework. This includes ongoing assessment of the Group's capital requirements to confirm that they meet regulatory solvency requirements.

The Group Chief Risk Officer also provides objective challenge and guidance on a range of risk matters to business managers, including the risks implicit in product developments, business transactions and new asset classes, and strategies for managing risks in line with the Group's overall risk appetite.

The Chief Risk Officer (CRO) for the LGIM division is the CRO for PMC. The divisional CRO and their team operate as an independent second line oversight function with reporting lines, systems and processes which are independent of the first line functions.

B.3.1.7 Risk committees

The Company operates within the Group's risk management framework. The Company's Board has ultimate responsibility for ensuring that the Group's risk management framework is appropriate for the Company. The Group Board's Risk Committee, supported by the Group Chief Risk Officer, serves as the focal point for risk management activities.

Beneath the Group Risk Committee is a structure of formal risk oversight committees providing more focused review and challenge of specific risks, and reviewing the effectiveness of frameworks in place to manage those risks.

The Company's Board:

- Owns the Company's overall risk management system
- Owns the Company's risk appetite statements
- Is the ultimate owner of the Company's regulatory relationships

The LGIMH Risk Committee ensures the effectiveness of the overall risk management system and recommends to the Company's Board material changes in risk appetite.

The Executive Directors are accountable for:

- The implementation and operation of the risk management system
- Identifying, measuring, managing, monitoring and reporting risks within the business
- Ensuring all business decisions are informed by risk-based measures by reference to the agreed risk appetite statements wherever appropriate
- Ensuring appropriate risk taking and risk assurance resources are in place

The Group Chief Risk Officer (Group CRO) leads the risk management function which provides the second line of defence across the Group.

Divisional Chief Risk Officers and their teams provide a more focused review and challenge of business processes and the management of the risks implicit in each of their operating divisions. The divisional CRO sits on the relevant divisional Executive team committees and strategic planning meetings to ensure that appropriate risks are considered at the earliest point and ensure engagement of other risk specialists as appropriate. The Divisional CRO for LGIM attends LGIMH Risk Committee meetings and has a direct reporting line to the divisional CEO, and access to the Group Risk Committee through the Group CRO.

Group Internal Audit provides the third line of defence across the Group. It provides assurance to the Group and LGIMH Audit Committees, Executive Directors and risk management function that the design and operation of the risk management system is appropriate for all risk types.

B.3.2 Own risk and solvency assessment

The purpose of the Own Risk and Solvency Assessment (ORSA) is to assess our risks and to evaluate whether we have sufficient financial resources to sustain the business strategy over the plan horizon across a range of scenarios. The Group ORSA process covers each Solvency II regulated insurer and the whole Group, including non-EU entities and non-insurance entities.

The ORSA process brings together, and is integrated with, our risk and capital management processes by which we identify, assess, monitor and measure our risks, review our business against risk appetite and tolerances and project the solvency position over the business planning period. The ORSA cycle is aligned with the strategic and business planning process so that the key elements can interact and inform forward-looking decision-making.

The ORSA policy was last reviewed by the Group Risk Committee on behalf of the Group Board in July 2020. The updated Group policy was cascaded to the legal entities within the Group and was approved by the PMC Governance Committee in August 2020.

Regular ORSA processes are aligned with the Group-wide strategic and business planning process, with various Group functions coordinating and/or aggregating key ORSA inputs provided by the business divisions.

Additionally we produce a solo entity-specific ORSA report for the Company on an annual basis which is reviewed and approved by the Board or delegated committee on behalf of the Board.

The core stages to the ORSA process are as follows:

- review ORSA framework and policy along with lessons learned and feedback from the previous ORSA cycle;
- Stress and scenario tests determined and recommended in order to provide sufficient time to model the results of those tests;
- projections of capital requirements as part of the annual planning process, including capital coverage ratio on the Solvency II basis; stress and scenario testing results inform the review of the plan;
- formal ORSA reporting, including the CRO's review of the plan and ORSA report.

Throughout the year, both the Group and the Company monitor performance against the current plan as well as monitoring risk and capital management information.

B.3.3 Governance of the Internal Model

The Group Board is ultimately responsible for ensuring the continuous appropriateness of the design and operation of the Group's partial internal model (the Internal Model). This responsibility is discharged through the Group Risk Committee, whilst the Group Internal Model Committee (GIMC) oversees Internal Model activities. The Company's Board is responsible for ensuring the continued appropriateness of the design and operation of the Internal Model for the Company.

The overall appropriateness and effectiveness of the Internal Model depends upon the effective operation of the Group's established internal control system.

First line business management are responsible for implementing adequate and effective controls over the Internal Model as well as the material risk exposures, with the ongoing application and effectiveness of these overseen by second line Group and divisional risk teams and by Group Internal Audit in the third line of defence. Material concerns are escalated to operational and senior management for resolution. The status of remediation activity is monitored by Group and divisional risk teams, with significant issues escalated to the GIMC and where necessary to the Group Risk Committee and LGIMH Risk Committee. Group Internal Audit provides independent oversight of the effectiveness of the internal control system.

This approach has ensured the implementation of adequate controls to ensure the ongoing appropriateness of the design and operation of the Internal Model, and these controls are subject to effective governance and oversight.

The Group Internal Model Governance Policy sets out the governance framework in place for the Internal Model designed to mitigate model risk. This complements the Group's existing system of governance, highlighting specific requirements in respect of the Internal Model to ensure that it operates properly on a continuous basis, including ensuring that controls relating to the Internal Model

are implemented in accordance with the Group Internal Control Policy and are adequate and effective at all times.

The Internal Model governance framework is outlined in the following table:

Board or Committee	Responsibilities
Group Board	Ensuring the ongoing appropriateness of the design and operation of the Internal Model. This responsibility is discharged through the GRC, subject to certain matters being reserved for its direct attention.
PMC Board	Ensuring the ongoing appropriateness of the design and operation of the PMC elements of the Internal Model; use and challenge of the model in decision making; ensuring that the model's scope remains appropriate; and ensuring that appropriate validation is performed.
Group Risk Committee (GRC)	Monitoring the performance and appropriateness of the Internal Model, including ensuring that related controls are adequate, effective, and implemented in line with the Group's Group Internal Control Policy.
Group Internal Model Committee (GIMC)	Overseeing the design, development and operation of the Internal Model to ensure that it operates as expected on a continuous basis to meet the Group's regulatory and economic requirements for risk-based capital management. This includes reviewing the effectiveness of internal controls as they relate to the Internal Model through the receipt of relevant reports and management information.

B.3.3.1 Internal Model controls

The first line business functions are responsible for operating a robust control framework to manage exposures and mitigate unacceptable outcomes (per the risk appetite). This includes the implementation of controls to mitigate key risks associated with processes they are responsible for and ensuring that these are regularly reviewed and remain fit for purpose. Day-to-day responsibility for ensuring that internal controls are in place and are operating effectively over Internal Model related processes is delegated to Internal Model Controllers (IMCs). IMCs provide first line management coverage of the Internal Model across all relevant legal entities and business units. Key responsibilities include ensuring compliance of their area with the requirements of the Group Internal Model Governance Policy and Group Internal Control Policy.

Oversight of the internal control system is provided by the Group Risk and divisional risk teams.

B.3.3.1.1 Changes over the reporting period

There have been no material changes to our internal model governance processes during the year.

B.3.3.1.2 Internal Model validation

The Group Validation Policy and associated standards define the Group's validation framework, and capture the requirements of the PRA Rulebook and relevant EU regulations. The framework requires an annual validation cycle for the Internal Model. This has been performed as part of the production of the Solvency Capital Requirement as at 31 December 2020. The objective is to produce a robust, proportionate and demonstrably complete approach to validation overseen by the Group Chief Risk Officer.

There is an annual assessment, led by the Group Enterprise Risk Director, to determine which aspects of the Internal Model must be independently validated. Independent validators must demonstrate how independence is met and state any limitations on independence.

Requirements for each annual cycle are specified in the Validation Terms of Reference. Respective validators outline approach, activities, tools and aspects of the model in Validation Work Programmes. The results, conclusions and consequences including remediation are detailed in independent validation reports or validation reports prepared by the first line. These are presented to GIMC for approval.

Validation activity

Internal Model validation activity for the reporting period covered the whole of the Internal Model. The level of validation undertaken was consistent with the level of risk incurred. Independent validation was performed on those areas identified as most material to the Internal Model's operation and results. The outputs are validation reports, highlighting key findings, strengths, weaknesses, limitations and remediation actions.

B.4 INTERNAL CONTROL SYSTEM

The Group internal control policy requires that each division's internal control system shall at least include administrative and accounting procedures, an internal control framework, appropriate reporting arrangements at all levels of the undertaking and a compliance function.

The Group's internal control framework seeks to ensure that:

- An organisational structure is defined, with clarity of roles, responsibilities and reporting lines;
- Appropriate management information and reporting processes are defined;
- Frameworks for decision making (including the delegation of authority) are articulated;
- Clear segregation of duties is in place;
- Conflicts of interest are managed;
- Administrative and accounting procedures are aligned with Group requirements;
- Personnel have sufficient skills, knowledge and expertise to discharge their responsibilities (including those relating to the regulatory environment);
- Adequate and orderly records of business are maintained;
- The security of customer data and other internal records is ensured;
- Business procedures combat financial crime;
- Processes are in place to deal with policyholder claims and complaints;
- The integrity of manual and computerised business systems is ensured; and
- Processes ensure assessment of the possible impact of any changes in the legal environment.

The Group's main entity boards, Audit Committees, and Risk Committees oversee the adequacy and effectiveness of the internal control framework, primarily through the receipt of assurances in support of the UK Corporate Governance Code, and reports from Group Internal Audit, external auditors, and risk teams in the second line of defence.

B.4.1 Solvency II Compliance function

We have defined the Solvency II Compliance function as being responsible for:

- advising the Board and its sub committees on compliance with the requirements of the Solvency II Directive and its associated laws, regulations and administrative provisions;

- advising the Board on the possible impact of any changes in the legal environment on operations of the undertaking concerned and the identification and assessment of compliance risk;

- developing and managing the Solvency II Compliance Policy, which inter alia sets out the responsibilities, competencies and reporting duties of the Solvency II compliance function; and

- establishing and operating the Solvency II Compliance Plan that details the activities the function will undertake in relation to compliance risk.

We have defined our Chief Risk Officer role as the functional head of Solvency II Compliance at the entity level, with the risk, actuarial, finance, and HR functions delivering activities in support of the Solvency II Compliance function.

Our Solvency II Compliance Policy defines who will perform the governance tasks and other activities of the Solvency II compliance function, their roles and responsibilities, and the overall approach to assessing, monitoring and reporting compliance with applicable laws, regulations and administrative provisions adopted pursuant to Solvency II Directive.

Our Solvency II Compliance Plan is defined as the review activities performed by the Compliance Function to support it in advising the Board and its sub committees on compliance in relation to Solvency II matters.

B.5 INTERNAL AUDIT FUNCTION

Group Internal Audit acts across the Group, providing a third line of defence. Group Internal Audit's responsibilities towards the Company align with its responsibilities towards the Group. It is an independent and objective assurance and advisory function whose primary role is to support the Board and Executive Management in the protection of the assets, reputation and sustainability of the Group.

Group Internal Audit carries out:

- independent reviews and audits of the controls mitigating the key risks in all areas of the business, prioritised according to the relative risk of each assignment as determined by Group Chief Internal Auditor in conjunction with senior management;
- reviews of all major business change initiatives; and
- reviews of the risk management and internal control processes

Group Internal Audit is responsible for the development of an internal audit plan, with a corresponding delivery timetable and budget. The plan typically details proposed audits over the next twelve months. Group Internal Audit reviews the plan regularly and advises the Board, through the LGIMH Audit Committee, of any material alterations to it. Any impact of resource limitations and significant interim changes are communicated promptly to the LGIMH Audit Committee and Group Audit Committee. The Internal Audit plan is developed using a risk-based methodology, including input from executive and non-executive senior management. Any significant deviation from the approved internal audit plan is communicated through the activity reporting process.

Internal control objectives considered by Group Internal Audit include:

- effectiveness of design and operation of processes and their actual outcomes, assessed against the Group's established values, ethics, risk appetite and policies;
- the appropriateness of the organisations' risk and control culture, including the attitude and approach taken by all levels of management to risk management and internal control;
- efficiency of operations, and use of resources;
- compliance with policies, plans, procedures, laws and regulations;
- reliability and integrity of management and financial information processes, including the means to identify, measure, classify, and report such information; and
- safeguarding of assets

The Group Chief Internal Auditor reports functionally to the Chair of the Group Audit Committee and administratively to the Group Chief Executive Officer.

The internal audit activity remains free from interference by anyone within the Legal & General Group. This includes the choice of business areas to audit, procedures, frequency, timing, or the content of Group Internal Audit reports. This ensures that the Group Internal Audit function can maintain a necessary independent and objective perspective.

Internal auditors have no direct operational responsibility or authority over any of the activities audited. Accordingly, they will not implement internal controls, develop procedures, install systems, prepare records, or engage in any other activity that may impair internal auditors' judgement.

Internal auditors will exhibit the highest level of professional objectivity in gathering, evaluating, and communicating information about the activity or process being examined. Internal auditors will make a balanced assessment of all the relevant circumstances and will not lose their objectivity when forming judgements.

The Group Chief Internal Auditor confirms to the Group and LGIMH Audit Committees, at least annually, the organisational independence of internal audit activity.

B.6 ACTUARIAL FUNCTION

The Actuarial Function across the Group is split along legal entity lines.

As part of the Senior Management & Certification Regime (SMCR), the PMC Chief Actuary as SMF20 has responsibility to ensure an effective Actuarial Function. Delegated operational activities are assessed and monitored via review of documents to demonstrate compliance with agreed methodologies and production standards, and regular meetings to assess ongoing effectiveness.

The Chief Actuary presents an annual report to the PMC Board summarising the activities of the Actuarial Function during the year to:

- support compliance with the requirements on the calculation of Technical Provisions;
- provide opinions on the underwriting and reinsurance arrangements; and
- contribute to the effectiveness of the risk management system more widely

The actuarial activities are split between those involved in delivery of actuarial analysis and reporting, and independent oversight and validation. Requirements are addressed through various activities and the membership of a number of key entity, divisional and Group Committees with risk and financial reporting responsibilities. For example, a number of reports during the year were provided to the Board on the data, models, methodologies, assumptions and results of the Solvency II Technical Provisions calculations.

B.7 OUTSOURCING

The Group's Outsourcing and Essential Supplier Services Policy sets out the framework and minimum standards of control and governance that Legal & General expects to be applied in the management of risks associated with outsourced supplier service arrangements. The policy specifies that an activity should not be outsourced where it would materially impair the quality of the Group's system of governance; unduly increase the Group's exposure to operational risk; impair the ability of supervisory authorities to monitor the Group's compliance with its obligations; or undermine continuous and satisfactory service to the Group's policyholders. Within the LGIM division, compliance with the Group Outsourcing and Essential Supplier Services Policy is overseen by the LGIM Supplier Management Committee, which is a sub-committee of the LGIMH Executive Risk Committee.

The policy requires that for all outsourced arrangements a rigorous evaluation and supplier selection process is undertaken having regard for the financial stability, expertise, ability and capacity of the supplier to deliver the required service. The policy also specifies that a written contract must be in place which must include: a service level agreement; the conditions under which the arrangement may be terminated; provision for the orderly transition of services if the contract is terminated; a defined mechanism to resolve disputes arising out of or relating to the contract; appropriate contingency plans should the supplier be unable to provide the required service; and provision for the continued availability of any software upon which Legal & General is reliant. Contracts must also ensure access to the providers' premises, business management and any data relating to the outsourced activity, by Legal & General's Internal Audit, Risk and Compliance functions, its external auditors and Supervisory Authorities; and appropriate warranties that Legal & General and client data is adequately protected against unauthorised access at all times. All outsourced arrangements must be managed under the direction of a named Legal & General relationship manager.

A number of the Company's external supplier arrangements are considered to be critical or important operational functions or activities and are monitored in line with the policy. These are:

- Citibank NA, which provides custodian services for the Company's non-UK assets and most of the Company's UK assets
- HSBC Bank plc, which provides custodian services for certain UK assets

Under an Agency Agreement, Citibank NA also provides the Company with a securities lending service which operates for the benefit of certain of the Company's unit-linked funds within strictly defined parameters.

The following significant services are provided to the Company by other companies within the Legal & General Group:

- Administration services are provided by Legal & General Investment Management (Holdings) Limited ('LGIMH')
- Investment management services are provided by Legal & General Investment Management Limited, with services in respect of specific funds sub-delegated to Legal & General Investment Management America Inc. and to Legal & General Investment Management (Asia) Limited
- Investment management services in respect of Property investments are provided by Legal & General Property Limited
- Investment management services in respect of Real Estate Debt investments are provided by LGIM Commercial Lending Limited.

These services are primarily charged to the Company on a cost recovery basis, and the outsourcing risks are assessed as if the Company performed the services directly.

B.8 ANY OTHER INFORMATION

B.8.1 Adequacy of the system of governance

The Group Executive Risk Committee (a sub-committee of the Group Risk Committee) undertakes an annual review of the Group's risk management framework and broader system of governance to confirm its adequacy given the nature, scale and complexity of the risks inherent in its business. The most recent review was in February 2021, where the Committee concluded that the Group's risk framework aligns with the Group's key risk exposures, and operated effectively during 2020 in identifying material risk exposures.

B.8.2 Any other information

All material information regarding the system of governance has been covered in the above sections B.1 to B.8 inclusive.

C. RISK PROFILE

Our Own Risk and Solvency Assessment (ORSA) is an ongoing analysis of our risk profile and the sufficiency of capital resources to sustain our business strategy over the plan horizon across a range of scenarios. The process, which is undertaken across the whole group, considers how the risks to which we are exposed may evolve over the planning cycle; the impacts of a range of more extreme stresses and scenarios on those risks; and the consequential impacts on our solvency position. The ORSA process is integrated into our business risk and capital management activities and aligned with the strategic planning process to inform forward-looking decision-making. As such, it is a key business management tool for the Group.

Our risk-based capital model seeks to provide a quantitative assessment of our relevant risk exposures. It forms part of the suite of tools that we use to evaluate our strategic plans and set risk appetite.

The key output from our capital model is the generation of capital requirements. We calibrate our model to a 99.5% value at risk confidence level over one year, equivalent to ensuring that we hold sufficient capital to survive our assessment of a worse case 1-in-200 year event.

There has been no material change in our risk profile during the financial reporting year.

In terms of the Company's Solvency II capital requirement, operational risk and underwriting (expense, lapse) risks remain our most significant risks.

C.1 UNDERWRITING RISK

C.1.1 Material risk exposures

Given the nature of our business, underwriting in this context refers to the setting of policyholder contract terms and fee rates, together with the associated taking on of lapse, expense and income risks. Underwriting risk is the exposure to loss arising from experience of these items being different to that anticipated.

On an IFRS basis, the Company's exposure to underwriting risk is immaterial.

Under Solvency II, the Own Funds amount includes a present value of projected future cashflows. Therefore, the Solvency II Own Funds are exposed to underwriting risk in so far as emerging future experience may differ from the assumptions made in calculating the present value.

Policies contain no material options or guarantees, and the Company has wide contractual rights to vary policy terms and conditions (including charges) upon suitable provision of notice to policyholders.

Pooled contracts contain an embedded annuity option whereby individual scheme members may purchase an annuity at the market rates prevailing at the time of purchase. Any such annuities would be automatically 100% reinsured under an existing reinsurance treaty. The terms of this option are therefore financially immaterial to PMC and in practice no such new annuities have been written for many years.

The nature of the PMC business means that any constraints related to underlying policyholder investments are automatically taken into account in the process of designing new funds or products.

C.1.1.1 Persistency risk

This is the risk of loss of future profits as a result of unexpectedly high surrenders (net of new business), which exposes the Company to the risk of lower fee income from policyholder assets. The standard terms under which the Company accepts new business are such that no material new business strain arises.

C.1.1.2 Expense and income risks

These risks relate to the impact of potential variation in the amount and/or timing of expenses incurred and in management fees and charges received, relative to the best estimate assumption.

Expense and income risks are managed through regular investigations and monitoring experience and reflecting the conclusions in product design and operating strategies.

Our main source of income relates to management fees generated by the value of assets under management. Fee rates have seen downward pressure in an increasingly competitive marketplace.

The amounts of expense incurred and income received also vary in line with the underlying mix of funds chosen by policyholders, in accordance with the various natures of the relevant funds' investment strategies.

C.1.2 Risk concentration

The Company's business exclusively relates to the investment needs of pension schemes, covering defined benefit and defined contribution arrangements, either directly or via a reinsurance accepted contract where the policyholder is another insurance company.

Some policies are reasonably large in terms of value of assets under management, though the unit-linked nature of the business means there is no resulting significant risk concentration exposure to the Company's solvency position. Approximately 11% of fee revenue during 2020 related to reinsurance accepted contracts where the policyholder is another insurer within the L&G Group, Legal and General Assurance Society Limited.

The market is served by a relatively small number of financial advisors, and consequently there is risk concentration such that potentially similar policyholder behaviours may impact the terms the Company is able to offer, in particular where schemes may be related within industry or employment sector.

C.1.3 Risk mitigation

Policies contain no material options or guarantees, and the Company has wide contractual rights to vary policy terms and conditions, including charges, upon suitable provision of notice to policyholders (typically four months).

Pooled policy terms and conditions also allow the Company to defer policyholder disinvestments if considered appropriate and in the interests of continuing policyholders in circumstances outside our control.

There are no guaranteed surrender values and policyholder payments equal the bid value of units disinvested. Our asset-liability matching policy requires assets to be held that are equal to the bid value of policyholder units. As such, there is no deviation between actual and expected payments.

Segregated contracts can be unilaterally terminated by the Company on provision of notice to the relevant client (typically one month).

Pooled contracts contain an embedded annuity option whereby individual scheme members may purchase an annuity at the market rates prevailing at the time of purchase. Any such annuities would

be automatically 100% reinsured under an existing reinsurance treaty. The terms of this option are therefore financially immaterial and in practice no such new annuities have been written for many years.

No additional financial guarantees or options, or extension in the standard notice period for changes to policy conditions, are permitted without specific approval by the PMC Governance Committee.

The LGIM Fees Committee has responsibility to approve, review and monitor the appropriateness and transparency of charges, including deviation from standard fee rates.

The LGIM Product Governance Committee has responsibility to review pricing strategies and assumptions for new initiatives prior to submission for approval by the LGIM Fees Committee.

The nature of the business means that any constraints related to underlying policyholder investments are automatically taken into account in the process of designing new funds or products.

Management controls are in place to manage lapse and expense risk, including regular monitoring of lapse experience, competitor activity, and ongoing cost income ratio, to initiate appropriate management action.

The risks associated with the very small annuity book, which are already immaterial, are further mitigated by a 100% reinsurance arrangement which is in place. As such, there is no residual longevity or other insurance risk in respect of the annuity book.

C.1.4 Risk sensitivity

A range of firm-wide stress scenarios are considered as part of the annual ORSA exercise. Given the nature of the business, asset and liability stresses are equal and opposite, and the only financial impact on the Solvency II basis arises from consequent fee variation and associated pressure on expenses.

The contribution, prior to diversification with other risks, towards the Company's Solvency Capital Requirement in respect of extreme (1-in-200 year event) variation in the components of underwriting risk experience is shown in form S.25.03 in the Appendix.

C.1.5 Prudent Person Principle (Underwriting risks)

The Company's only material line of business is unit-linked business whereby the investment risk is borne by the policyholders and the benefits provided are directly linked to the value of assets contained in internal funds divided into units.

The Company holds assets which match the nature and value of the policyholder liabilities, set as the bid value of the units. Accordingly, the assets held are invested in a manner appropriate to the liabilities and in the best interest of all policyholders.

C.2 MARKET RISK

C.2.1 Material risk exposures

The vast majority of assets on the Company's balance sheet are held for unit-linked and index-linked contracts and therefore the nature of the business written is such that investment returns on these assets contribute directly to the value of policyholder units. Assets are invested in line with the fund choices made by the policyholders, and the associated market and counterparty risks are borne by the policyholders.

The Company is exposed to the risk of volatility in asset management fee income due to the impact of movements in interest rates, currency rates and market prices, on the fair value of the assets held in the linked funds, on which fees are based. There is also the risk of expense over-runs should the market depress the level of charges which could reasonably be imposed.

The Company's shareholder investments are primarily held to provide liquidity and capital security, and the assets held are subject to minimal market risk accordingly.

C.2.2 Risk concentration

The Company provides a wide range of unit-linked funds and, subject to the fund choices made by its policyholders, assets held for unit-linked contracts are diversified in such a way as to avoid excessive reliance on any particular asset, issuer or group of undertakings, or geographical area and excessive accumulation of risk in the portfolio as a whole.

Unit-linked fund investments in assets issued by the same issuer, or by issuers belonging to the same group, do not expose the Company to excessive risk concentration.

A significant proportion of the Company's Own Funds are invested in holdings of UK government securities. However these are restricted to securities with short remaining duration to maturity and as such are not significantly exposed to market risk.

C.2.3 Risk mitigation

Market risks are managed through maintaining a diversified range of funds in which customers may invest, including external funds. In addition, the Company has the contractual right to amend pooled fund policy terms on provision of suitable notice to policyholders.

C.2.3.1 Unit-linked and index-linked contracts

The underlying investments held in respect of unit-linked and index-linked contracts are selected in the best interest of policyholders and beneficiaries, taking into account the disclosed objectives, documentation and expectations for the relevant funds and any liquidity or other contractual constraints.

The market risks relating to each fund are fully communicated to policyholders.

C.2.3.2 Segregated contracts

For segregated mandates, an Investment Management Agreement (IMA) is in place for each client and details the allowable nature and terms of asset transactions agreed by the relevant client.

There is no asset-liability mismatch risk, other than via the operational risk of the IMA not being suitably adhered to. As such, this risk is covered under the Operational Risk Policy.

C.2.3.3 Unit-linked matching

Article 132(3) of the Solvency II Directive requires that where policy benefits are directly linked to the value of units or assets contained in an internal fund, technical provisions must be held which are represented as closely as possible by those assets.

PMC's matching philosophy is to hold the appropriate assets within each unit-linked fund to the value which matches the unit-linked liabilities, determined as the bid value of the units.

As such, PMC does not expect to operate a unit box position and no deliberate mismatches are permitted.

C.2.3.4 Shareholder assets

The Company's policy is such that shareholder investments are primarily held to provide liquidity and capital security, as distinct from targeting specific investment returns. Accordingly market risk is kept to a minimum by requiring the shareholder assets to be concentrated towards short-dated, high-quality assets, denominated in Sterling.

C.2.4 Risk sensitivity

Direct exposure to market risks is borne by policyholders within the relevant unit-linked funds. Under asset stress within unit-linked funds, the Company is exposed only to second order risk of lower fee income from assets under management and an associated pressure on continuing to meet expenses.

Minimal market risk is associated with the Company's directly held investments within Own Funds, which are short-dated, high-quality assets.

A range of firm-wide stress scenarios are considered as part of the annual ORSA exercise. Given the nature of the business, asset and liability stresses are equal and opposite, and the only financial impact arises from consequent fee variation.

The contribution, prior to diversification with other risks, towards the Company's Solvency Capital Requirement in respect of the components of market risk is shown in form S.25.03 in the Appendix.

C.2.5 Prudent Person Principle (Market risks)

Investment management services provided to the Company by LGIM and other LGIMH companies operate under a strict set of controls with regards to the type and amount of assets that are allowed. These controls are exercised through mandates which list the acceptable asset classes and exposure limits.

Derivative instruments are held directly within policyholder unit-linked funds for risk reduction or efficient portfolio management purposes only. Derivatives are also held indirectly, for example within collective investment schemes, for investment purposes as well as efficient portfolio management. However, there is no cross-contamination of derivatives held for investment purposes in collective investment schemes with assets held directly in PMC's long-term fund and therefore there is no burn through exposure from these indirect derivative contracts to other policyholders invested in PMC's long-term fund.

The Company holds assets for unit-linked contracts which match the nature and value of the policyholder liabilities, set as the bid value of the units. Accordingly, the assets held are invested in a manner appropriate to the liabilities.

The Company invests its capital in short-dated high-quality liquid instruments, such as UK gilts, which are subject to minimal market risk.

C.3 CREDIT RISK

C.3.1 Material risk exposures

Credit risk is the risk that the Company is exposed to loss if another party fails to perform its financial obligations to the Company.

For unit-linked contracts, the Company matches all the liabilities with assets in the portfolio on which the unit prices are based. There is therefore no material interest, price, currency or credit risk for the Company on these contracts. Credit and counterparty risks on unit-linked funds are borne by the policyholders.

The Company is directly exposed to counterparty risk relating to shareholder cash held at banking counterparties. This includes the risk of counterparty default for the short period between receipt of monies in respect of client investment into, or disinvestment from, unit-linked funds and the corresponding completion of the processing of those monies into the relevant funds or by settlement to client as applicable. The risk is not material given the framework of counterparty controls and limits that operate.

The Company is exposed to the risk of default in respect of payment of fees by clients and the risk of default under the Company's reinsurance arrangements. However these risks are not considered to be material given the exposure amounts and the risk controls and mitigations that are in place.

The Company holds short-dated UK government securities and short-term deposits as capital.

C.3.1.1 Reinsurance counterparty risk

The Company does not have any material credit risk exposure to third party or internal reinsurers. Information on the nature of the exposures is shown below for completeness.

C.3.1.1.1 Legal & General Group Plc shares held via reinsurance

The pooled fund business offers a wide range of investment fund types. Some funds with a UK equity index component necessarily desire to have an exposure to movements in the Legal & General Group Plc share price. In order that the Company does not itself hold shares in its own ultimate parent company (since a direct holding would breach a Companies Act requirement), the required exposure is obtained via a reinsurance arrangement with Swiss Re Europe S.A. (Swiss Re).

The underlying purpose of the reinsurance is to reduce tracking error on policyholder UK Index funds in order to facilitate closer alignment of policyholder returns to the relevant index economic constituents.

The economic effect of the reinsurance (i.e. on a look-through basis) is that the index funds are exposed to Legal & General Group Plc share price movement, as desired. Although the contractual arrangement is classified as a reinsurance treaty, it does not have the typical features of a risk mitigating contract since the purpose is not to indemnify the Company against losses. The value of the reinsurance treaty (which is directly linked to the assets held in a Swiss Re custody account) is included in the assets held for unit-linked funds and exactly matches the policyholder liability. As such there is no basis risk.

PMC has a floating rate first priority charge on the portfolio of Legal & General Group Plc shares (and any uninvested cash) held by the reinsurer to match this exposure, and these assets are held for the reinsurer in a custody account with LGIM as asset manager.

In principle, PMC is exposed to the risk of reinsurer default. However, the priority charge on the relevant assets means that, in the event of such default, the value of those assets would be secured for PMC. The reinsurer's credit rating, in conjunction with the operation of the priority charge and the unit-linked nature of the liabilities, is considered to mean immaterial counterparty default risk applies. Further, the custodial relationship for the assets is managed by LGIM as asset manager and trading instructions are routed via LGIM, and as a result PMC has good ongoing visibility of the assets charged for its benefit.

C.3.1.1.2 Investment Only platform

The Company also has in place a number of reinsurance arrangements with external third parties relating to a minor proportion (less than 1%) of the assets held within unit-linked funds. The underlying purpose of the arrangements is not to transfer risk in the conventional reinsurance sense but instead the various arrangements allow expansion of the available range of policyholder investment choice.

Although contractually structured as reinsurance treaties, there is no underlying transfer of risk as the PMC policyholder bears the risk of reinsurer default (which is explicitly written accordingly into each legal contract between the Company and the relevant PMC policyholders) and the Company's exposure is restricted to a second order impact via consequent reduction in fee income. At the current levels, such second order exposure is immaterial.

The nature of the arrangements means that the Company is not directly impacted by the credit standing of each reinsurer. Nevertheless, before each arrangement is entered into, the Company secures an appropriate floating charge from the relevant reinsurer to the value of the relevant assets in order to reduce the risk of PMC policyholders being adversely economically impacted by reinsurer default. Approval for these arrangements is governed by the existing product and fund approval framework.

C.3.1.1.3 Annuity reinsurance

The Company also has a reinsurance arrangement with Legal and General Assurance Society Limited in respect of a very small book of annuities in payment. The gross exposure is financially immaterial to the Company's balance sheet. The reinsurer also provides all administration services for the small number of policies concerned.

C.3.1.2 Banking counterparty risk

The Company is exposed to potential financial loss should banks or other issuers of financial instruments default on their obligations to us. We are also exposed to counterparty risks in respect of the providers of settlement and custody services.

Exposures to banking counterparties and the issuers of financial instruments are controlled using a framework of counterparty limits. These limits take account of the relative financial strength of the counterparty as well as other exposures that the Company may have. Limits are subject to regular review with actual exposures monitored to limits. We apply defined criteria for the ongoing monitoring of custody and settlement services and the financial strength of providers is regularly reviewed.

C.3.1.3 Client counterparty risk

Whilst it is possible for the fund management fees to be deducted as part of the unit price, the majority of policyholders pay fund management fees quarterly in arrears.

Although there is therefore an exposure to the risk of clients not paying the incurred and invoiced fees in a timely manner, the standard policy terms allow the Company to recoup any unpaid amounts directly from the surrender value of units allocated to the relevant client's policy should this prove to be necessary.

A minority of new clients occasionally request that the Company allocates fund units in advance of the client providing monies for investment. The Company only agrees to such 'pre-funding' subject to strict limits and controls, and the timeframe involved before receipt of the client monies is typically two days. Counterparty risk is not material as the Company holds the assets purchased, and standard policy terms include indemnity rights to recover any losses if purchases are reversed due to non-receipt of the client investment monies.

C.3.2 Risk concentration

A significant proportion of the Company's capital is invested directly or indirectly in holdings of UK government securities. However these are restricted to securities with short remaining duration to maturity and, in conjunction with the UK government's credit rating, do not expose the Company to any material credit risk or significant risk concentration.

The agreed limits for placement of overnight deposits with counterparties are set at a level to avoid material risk concentrations.

C.3.3 Risk mitigation

The Investment Manager is assigned diversification limits to manage shareholder exposures to external counterparties. Diversification limits are subject to the Investment Manager's independent portfolio monitoring and breach reporting processes.

Counterparty risk relates primarily to shareholder deposits and cash balances held with third-party banking institutions. This is monitored to ensure that counterparty placements do not exceed agreed limits and that amounts held in the current accounts are placed with other counterparties each day. The process allows a proportion of cash to be left with the relevant third-party custodian.

As described in section C.3.1.3 above, the Company has the right to effect payment of the relevant outstanding amount should invoiced fees remain unpaid, either by auto-surrender of policy units in accordance with the standard terms and conditions or by deduction from proceeds at the point of policy redemption.

Reinsurance counterparty risks are mitigated by the presence of the floating charges described in section C.3.1.1 above.

C.3.4 Risk sensitivity

The Company has no material exposure to credit risk.

C.3.5 Prudent Person Principle (Credit risks)

Investment management services provided to the Company by LGIM and other LGIMH companies operate under a strict set of controls with regards to the type and amount of assets that are allowed. These controls are exercised through mandates which list the acceptable asset classes and exposure limits.

Assets are properly diversified in such a way as to avoid excessive reliance on any particular asset, issuer or group of undertakings, or geographical area and excessive accumulation of risk in the portfolio as a whole.

Investments in assets issued by the same issuer, or by issuers belonging to the same group, do not expose the insurance undertakings to excessive risk concentration. The Company has a relatively large proportion of shareholder investments in UK gilts; however these are considered to be low risk assets.

To ensure protection of assets for unit-linked funds, pooled business invested assets are held by independent custodians, and clients are further protected by the presence of a floating charge over all PMC's assets and a security trustee.

Where clients have chosen to link the value of their policy to a fund provided by an external insurer, the Company secures an appropriate floating charge from the relevant insurer to the value of the relevant assets in order to reduce the risk of the clients being impacted by reinsurer default.

For segregated business, the assets are held at the client's custodian.

C.4 LIQUIDITY RISK

C.4.1 Risk exposure

Liquidity risk is the risk that the Company, though solvent, either does not have sufficient liquid financial resources available to meet its obligations as they fall due, or can only secure such liquid

financial resources either at an excessive borrowing cost or through a sale of assets at a price significantly below the fair value of such assets in the recent past.

The cash conversion cycle within the Company is such that there is some exposure to corporate working capital strain; in particular, fee income is typically collected quarterly in arrears but expenses are payable monthly.

The investment risks associated within the unit-linked funds, including liquidity risk, are borne by the policyholders.

C.4.2 Liquidity risk management

The Company does not seek exposure to liquidity risk as a part of its business model, but accepts that exposure to liquidity risk can arise as a consequence of the markets in which it operates, the products that it writes and through the execution of investment management strategies.

Overall, the Company maintains sufficient liquid funds for business as usual purposes. Furthermore, it seeks to ensure that exposures to liquidity risk which arise are effectively managed so that the Company continues to meet its obligations under unlikely, but plausible, extreme liquidity scenarios.

Exposure to liquidity risk is measured in terms of a liquidity coverage ratio expressed in terms of the sources of cash or liquid assets and committed facilities that need to be maintained to cover identified liquidity requirements. The identified liquidity requirements are defined as:

- *Near term:* The immediate liquidity requirements managed under normal circumstances on a daily basis. The main requirements here include working capital funding, together with known and forecast cash flows relating to less routine transactions such as dividend payment to our parent company. In this everyday scenario the sources of liquidity are cash held in bank accounts and liquidity funds and known cash inflows;
- *Moderate:* This scenario is adjusted for stresses more severe than everyday requirements. The sources of liquidity are also stressed in this scenario and may be reduced because of the adverse effects of the stress scenario;
- *Extreme:* The stressed liquidity requirements in an unlikely, but plausible, extremely adverse market scenario. The sources of liquidity are also stressed in this scenario and may be reduced because of the adverse effects of the stress scenario.

In addition to other sources of liquidity, the Company has access to short-term borrowing in the form of an overdraft facility with HSBC.

A credit facility has also been established with Legal & General Finance Plc for the provision of up to £200m for use in the event that the Company does not have sufficient cash on any given business day. This facility is primarily intended to cover planned short-term spikes in the Company's liquidity requirements, and as such any loan through this facility will normally be very short term. The loan facility is also available, if required, to provide liquidity in other defined circumstances, such as around the time of the annual dividend payment, in which case the duration for loan repayment is agreed at the time of borrowing though will typically not exceed 6 months.

C.4.3 Risk concentration

The Company's control framework defines procedures, exposure limits and minimum credit quality standards in order that no material liquidity risk concentration exists.

C.4.4 Risk mitigation

Policyholders who invest in the Company's pooled pension funds do so by way of an insurance policy to which units are allocated in the range of pooled investment funds operated as 'PF Sections'.

The investment risks associated with the unit-linked funds, including liquidity risk, are borne by the policyholders.

As part of its existing liquidity risk management, the Company uses daily controls to monitor and manage withdrawal requests.

Where a PF Section could not meet a requested redemption from its prevailing cash level, the relevant fund manager would work with the trading team on a dealing strategy that raises the required cash sum without material disruption to the PF Section or its remaining policyholders.

Standard redemption terms are communicated with clients and vary according to the dealing frequency of the relevant fund.

No surrender penalties apply upon surrender. However, in addition to the standard redemption terms which apply as described above, the contractual policy terms include further provisions for liquidity management as follows:

- where the surrender of units in an individual PF Section is greater in value than £1m, PMC can give notice to transfer assets in specie
- when market conditions or other external factors impact the realisation of underlying investments, the Company may delay surrender payment by up to one year for all pooled funds, and by a further nine months for real estate funds.

For segregated mandates, investment objectives are agreed with each client at outset and include any liquidity requirements. The Company is not exposed to any liquidity risk in respect of the investments managed under segregated mandates.

C.4.5 Expected profit in future premiums

All in-force business written by the Company is treated for valuation purposes as single premium business. As such the amount of the expected profit from future premiums included on the Solvency II balance sheet is zero.

C.4.6 Prudent Person Principle (Liquidity risks)

Investment management services provided to the Company by LGIM and other LGIMH companies operate under a strict set of controls with regards to the type and amount of assets that are allowed. These controls are exercised through mandates which list the acceptable asset classes and exposure limits.

The Company's shareholder investments are short-dated, high-quality localised liquid assets.

Although no regulatory requirement exists for the segregation of shareholder cash and policyholder cash in transit, PMC has implemented a policy of physically separating them to strengthen policyholder protection and provide greater clarity to underpin the Company's floating charge security structure.

C.5 OPERATIONAL RISK

C.5.1 Material risk exposures

Operational risk is defined as loss arising from inadequate or failed internal processes, people, systems or external events.

The Company operates within a framework of internal controls to minimise the risk of unanticipated loss from operational risk events, whilst recognising that no system of internal control can completely

eliminate the risk of error and financial loss. Poor or inefficient business processing can also lead to increased cost as a whole, and operational errors with associated reputational damage and loss of assets.

The Company's operational risk exposure has two main components.

The first covers processing risks, which arise relatively frequently from the day-to-day operations of the business. Control frameworks are designed to minimise such operational losses to acceptable levels.

The second covers event risks, relating to rare events which have a low probability but may have a material financial impact should they occur and may cause reputational damage. Controls and processes are designed to prevent and detect any such event.

Operational risks are regularly reviewed, including an annual in-depth analysis and discussion at risk assessment meetings with senior management and relevant Committees. The Company's long term Future Platform Initiative has delivered a number of initiatives that have improved infrastructure, control environment and risk framework. The Company continues to undertake significant investment in system capabilities and business processes to meet the expectations of customers and regulators as well as comply with regulatory, legal and financial reporting requirements, and continues to further enhance controls and further mitigate the risks of loss from operational risk events.

C.5.2 Risk concentration

Investment management services are provided by LGIM. Given the size and nature of the Company's business, the operational systems and processes utilised by LGIM represent a potential concentration of operational risk for the Company, albeit LGIM procedures remain subject to the Group's internal control framework as appropriate.

We have not identified any other material risk concentration for operational risk.

C.5.3 Risk mitigation

The Company has a well-established and embedded risk governance model that seeks to ensure that business management is actively engaged in ensuring an appropriate control environment for managing the risks implicit in the business. The Risk function led by the Chief Risk Officer provides both expert advice and guidance on the required control environment, together with objectively challenging the way risks are being managed. The Internal Audit function, which reports to the Group Audit Committee and to the LGIMH Audit Committee, provides independent assurance on the adequacy and effectiveness of controls.

The Company's plans for growth will inherently change the profile of operational risk across the business. Accordingly, as the Company grows, it continues to invest in system capabilities and operational processes to meet the expectations of customers; comply with regulatory, legal and financial reporting requirements; and mitigate the risks of loss or reputational damage from operational risk events. To deliver this, a number of strategic initiatives are being implemented.

A minor portion (approximately 12%) of the Company's UK gilt capital holding is held in a bespoke Qualifying Investor Alternative Investment Fund managed by LGIM (Ireland) Risk Management Solutions, which can be used from time to time to hedge the potential risks to the PMC balance sheet following the occurrence of specific market-related operational risk errors. This holding is consistent with PMC's risk appetite regarding minimal market risk exposure for shareholder assets.

The financial services sector has seen attempts by third parties to seek and exploit perceived vulnerabilities in IT systems. Potential threats include denial of service attacks, network intrusions to steal data for the furtherance of financial crime, and the electronic diversion of funds. We are focused

on maintaining a robust and secure IT environment that protects customer and corporate data and minimises the potential for the perpetration of criminal acts. Processes exist to evaluate the security of systems and proactively address emerging threats.

C.5.4 Risk sensitivity

A variety of sensitivity tests are undertaken within the calibration of the operational risk capital requirement, including: using alternative distribution shapes for operational risk scenarios; applying different techniques to combine scenarios; and varying correlation assumptions. The sensitivity tests employed have identified no material concerns with the results of the calibration.

The key categories of operational risk are monitored within regular internal reporting and can be used to initiate a reassessment of capital needs to be undertaken if considered appropriate.

The contribution, prior to diversification with other risks, towards the Company's Solvency Capital Requirement in respect of operational risk is shown in form S.25.03 in the Appendix.

C.5.5 Prudent Person Principle (Operational risks)

Investment management services provided to the Company by LGIM and other LGIMH companies operate under a strict set of controls with regards to the type and amount of assets that are allowed. The investment manager is only permitted to invest on behalf of the Company in assets and instruments whose risks it can properly identify, measure, monitor, manage, control and report.

The relevant investment objectives, guidelines and restrictions, including consideration of the requirements of COBS 21 (permitted links), are documented for each unit-linked fund. The nature of the PMC business means that any constraints related to underlying policyholder investments are automatically taken into account in the process of designing new funds or products.

Granular asset data for all assets held by the Company is included in regular reporting to the PRA.

C.6 OTHER MATERIAL RISKS

There is also reputational contagion risk to the Company from events that may arise elsewhere within the parent Legal & General Group. Lack of confidence in the Company and the Group is mitigated by the retention within the Company of sufficient capital to avoid the need to rely on parental support in all but the most extreme circumstances and by effective ongoing capital management.

The markets in which the Company operates are highly regulated, with regulation and legislation defining the overall framework for the design, marketing and distribution of products; the acceptance and administration of business; and the prudential capital that regulated companies should hold. There continues to be a significant pipeline of globally driven regulatory change, which may affect the cost of providing insurance-based investment products or the way that investment firms do business, and including continuing consideration of climate change effects.

The long-term impact on regulation of Brexit is still developing. A small proportion (approximately 1%) of the Company's business relates to Ireland-based clients. The UK left the European Union on 31 January 2020 with a withdrawal agreement and a transition period for financial services agreed. This allowed the Company to continue to carry on insurance business in Ireland without the necessity of a third-country branch until the end of the transitional period on 31 December 2020. On 10 December 2020, the Withdrawal of the United Kingdom from the European Union (Consequential Provisions) Act 2020 was signed into law by the Irish President. This permits the Company to continue to administer unit linked insurance policies issued to existing Irish policyholders for a maximum period of 15 years from the 31 December 2020, and the Company is continuing to operate its existing insurance

business in Ireland accordingly on that basis. The Company continues to engage with the Central Bank of Ireland on matters relating to its insurance business in Ireland.

The Company has a framework for identifying emerging risks through annual reviews of divisional plan strategy, regular meetings with senior management and a quarterly legal entity and business risk assessment.

The emergence during 2020 of the Covid-19 pandemic reinforces the exposure of businesses to the risk of operational disruption, and significant financial market volatility has been observed. We are exposed to the risk of disruption to our business operations should our employees or those who work in our supply chains become unwell and from restrictions on travel which are put in place. We have already taken action to support the resilience of our business operations, and we have well established management procedures to continue to closely monitor any new risk factors as they emerge to ensure an appropriate response.

C.7 ANY OTHER INFORMATION

The above sections C.1 to C.6 inclusive contain all material information regarding the risk profile of the Company.

D. VALUATION FOR SOLVENCY PURPOSES

D.1 ASSETS

A summary of the Company's assets on the Solvency II valuation basis is set out in the following table.

Assets (£m)	**2020**	**2019**
Assets (other than those held for linked contracts)	650	598
Bonds	*230*	*229*
Collective Investment Undertakings	*31*	*31*
Deposits other than cash equivalents	*164*	*104*
Cash and cash equivalents	*6*	*33*
Reinsurance recoverables	*2*	*2*
Insurance and intermediaries receivables	*67*	*70*
Other (non-invested) assets	*149*	*129*
Assets held for index-linked and unit-linked contracts	344,806	322,392
Total Assets	**345,456**	**322,990**

D.1.1 Solvency II valuation for each material class of asset

The Solvency II Balance Sheet is prepared on a market-consistent basis, whereby assets are accounted for at market value and liabilities are assessed on a best estimate basis.

The Company values its assets in accordance with Article 75 of the Solvency II Directive and in line with the requirements of Article 10 of the Solvency II Delegated Regulation. Valuations of assets are underpinned by a system of processes and controls ensuring compliance with Article 267 of the Solvency II Delegated Regulation. Included within these processes is an assessment of valuation uncertainty and the extent to which asset valuations are appropriate in light of uncertainties that exist. This process focusses on, although is not limited to, assets that are valued using alternative valuation techniques.

There is no material uncertainty in the valuation of assets. A minority (approximately 1%) of instruments on the balance sheet are valued using alternative valuation techniques where some inputs are not based on observable market data (unobservable inputs). All such instruments are held within unit-linked funds and the designated asset value is exactly matched by a policyholder unit liability of identical amount. Further detail on these is provided in section D.4 below.

We have concluded that our assets are valued appropriately in accordance with Article 10 of the Solvency II Delegated Regulation and appropriately reflect consideration of valuation uncertainty.

There have been no material changes to the asset recognition and valuation bases used during the reporting period.

D.1.1.1 Bonds

Bond investments are measured at fair value using quoted market bid prices.

D.1.1.2 Deposits other than cash equivalents

These are short-term deposits held with highly rated banks and other financial counterparties, measured as the par amount of the deposit plus any attaching accrued interest.

D.1.1.3 Assets held for index-linked and unit-linked contracts

Assets held for index-linked and unit-linked contracts are measured at the fair value of the underlying assets and liabilities (other than technical provisions) held within such funds.

Unit-linked assets are closely matched to the corresponding liabilities, and the value of policyholder assets held equals the bid value of the policyholder unit liability.

Where available, assets and liabilities within unit-linked funds are valued using quoted market bid prices obtained from independent sources in active markets for the identical assets and liabilities.

Derivative assets are directly held only within policyholder unit-linked funds for efficient portfolio management. When valuing derivatives as part of the unit-pricing mechanism, warrants, futures, swaps and listed options are taken at market value and currency forwards are valued using current exchange rates.

A minority of instruments within unit-linked funds are valued using unobservable inputs. Further detail on these is provided in section D.4 below.

D.1.1.4 Reinsurance recoverables

This asset class is not financially material but is described here for completeness. The value shown in the balance sheet corresponds to the best estimate liability for a very small immediate annuity book which is included within gross technical provisions and is 100% reinsured.

The Company also has in place a number of reinsurance arrangements with external third parties relating to a minor proportion (less than 1%) of the assets held within unit-linked funds. Although contractually structured as reinsurance treaties, the underlying purpose of the arrangements is not to transfer risk in the conventional reinsurance sense but instead the various arrangements allow expansion of the available range of policyholder investment choice and facilitate exposure within certain unit-linked funds to the price of Legal & General Group Plc shares. The value of these reinsured assets is included within the total asset value held for linked contracts.

D.1.1.5 Cash and cash equivalents

Cash and cash equivalents are valued at fair value in accordance with IFRS. The value primarily relates to cash in hand or held at call with banks.

D.1.1.6 Insurance and intermediaries receivables

These are held at fair value in accordance with IFRS. This item primarily relates to invoiced fees due to be received from clients.

D.1.1.7 Other assets

These are held at fair value in accordance with IFRS. This item primarily relates to fees which have accrued though not yet invoiced to clients.

D.1.2 Material differences between IFRS and Solvency II valuation

There are no material differences in the bases, methods and main assumptions used in the asset valuation for Solvency II purposes compared to the valuation in the IFRS financial statements.

Deferred acquisition costs are an allowable asset on the IFRS balance sheet but are not recognised on the Solvency II balance sheet. However, the relevant amount on the Company's IFRS balance sheet at the valuation date was immaterial (£1m).

There are certain presentational differences which have zero net impact on the balance sheet position.

The main relevant presentational difference is that under Solvency II all assets held for linked contracts are consolidated and reported as a single distinct asset class, whereas in the IFRS financial statements the underlying assets and liabilities within the unit-linked funds are separated out and shown according to the nature of each particular instrument. As such the total asset value shown in the IFRS financial statements is higher than that shown in the Solvency II balance sheet by £6bn, with a correspondingly equal higher value of the associated liabilities. The main component of this difference relates to the presentational treatment of the fair value of derivative liabilities within unit-linked funds.

One further presentational difference is that short-term deposits are included in the IFRS balance sheet within Cash and cash equivalents, whereas for Solvency II these are separated out and shown under Deposits other than cash equivalents.

D.2 TECHNICAL PROVISIONS

A summary of the Company's technical provisions as at 31 December 2020, split by the defined Solvency II lines of business and including comparison to the previous year-end position, is set out in the following table.

Solvency II Technical provisions at 31 December 2020 (£m)	Index-linked and unit-linked insurance	Other life insurance	Accepted reinsurance	Total 2020
Best estimate liability	266,620	2	77,444	344,066
Risk margin	46	0	14	60
Total Technical Provisions (gross)	**266,667**	**2**	**77,457**	**344,126**

Solvency II Technical Provisions at 31 December 2019 (£m)	Index-linked and unit-linked insurance	Other life insurance	Accepted reinsurance	Total 2019
Best estimate liability	259,050	2	62,766	321,818
Risk margin	40	0	10	50
Total Technical Provisions (gross)	**259,090**	**2**	**62,776**	**321,868**

The line of business described as accepted reinsurance is entirely comprised of contracts which are similar in all material respects for valuation purposes to the index-linked and unit-linked insurance line of business. Accordingly, in the following sections, 'unit-linked' refers to both of these Solvency II lines of business.

D.2.1 Solvency II valuation basis for material lines of business

For Solvency II, technical provisions are calculated as the sum of a best estimate liability and a risk margin.

Liabilities under the unit-linked contracts are recognised as and when the units are created.

Unit-linked assets are closely matched to the corresponding liabilities, and the value of policyholder assets held equals the bid value of the policyholder unit liability.

D.2.1.1 Methodology

D.2.1.1.1 Best estimate liability

The best estimate liability for the unit-linked business is a combination of the bid value of policyholder units and a discounted value of future expected cashflows (i.e. expected fee income less expenses) over a suitable projection period using risk-free rates of return and best estimate experience assumptions.

For valuation purposes, all of our contracts are treated as single premium policies and projected cash-flows assume no future premium payments accordingly.

The cash flow projection includes the following components in relation to existing contracts:

- payments to policyholders;
- expenses that will be incurred in servicing existing contractual obligations, including expenses incurred in making payments to policyholders and investment management costs; and
- charges and fees received in respect of continuing existing contracts.

The projection period differs for pooled business and segregated contracts, reflecting their inherently different contractual terms and conditions.

For the segregated business, the assets under management are excluded from the Solvency II balance sheet since these assets remain owned by the relevant third-party client. For the purposes of setting technical provisions under Solvency II rules, for segregated contracts the methodology directly reflects the Company’s unilateral right to terminate the provided services upon giving one month’s notice. Accordingly the present value of future projected cashflows on segregated contracts would be calculated using a one month projection period, and applying this as a reduction in balance sheet liabilities. In practice, we instead take the value to be zero. This proportionate approach gives materially the same overall result on the Solvency II basis.

D.2.1.1.2 Risk margin

Solvency II regulations require insurers to hold a risk margin as an additional liability within Technical Provisions. The risk margin is designed with the aim of ensuring that the overall value of a firm’s technical provisions is equivalent to the amount that would be expected to be required if a third party were to take over and meet the insurance obligations of the firm.

The risk margin in relation to our business is relatively small, reflecting the nature of the business which almost entirely consists of unit-linked contracts with no material options or guarantees.

The risk margin is calculated as the present value of the cost of capital required in respect of non-hedgeable risks within the Solvency Capital Requirement over the assumed projected run-off period of the relevant business. The discount rate used to determine the present value is the relevant basic risk-free rate, and the cost of capital rate is set to 6% as prescribed in the Delegated Regulations. The calculation assumes that all risks are non-hedgeable, with the exception of market risk, which is assumed to be hedgeable.

The calculation of Solvency II risk margin for the PMC unit-linked business uses an approximation rather than undertaking a precise projection of future capital requirements. The non-hedgeable components of the SCR are projected forward over future years using appropriate proxy carrier variables for each relevant risk; for example, the operational risk component is based upon the projected value of funds under management. This is appropriate since movements in fund sizes can be expected to impact transaction volumes and hence impact operational risks.

The approximation used implicitly assumes stable diversification between risks. This is appropriate given the cash flow projection period and the relative immateriality of the size of the risk margin. It would be disproportionate to model a more precise approach allowing for variation in diversification.

D.2.1.1.3 Matching adjustment

PMC does not apply the matching adjustment referred to in Article 77b of Directive 2009/138/EC.

D.2.1.1.4 Volatility adjustment

PMC does not apply the volatility adjustment referred to in Article 77d of Directive 2009/138/EC.

D.2.1.1.5 Transitional measures

PMC does not apply the transitional risk-free interest rate-term structure referred to in Article 308c of Directive 2009/138/EC.

PMC does not apply the transitional measure on technical provisions referred to in Article 308d of Directive 2009/138/EC.

D.2.1.2 Main assumptions

The cash flow projection assumptions reflect the relevant contract terms and conditions, and cover expected persistency, expenses and fee income. The assumptions are set by reference to and examination of detailed experience analysis for each item, supplemented by expert judgement where considered appropriate, for example to incorporate any anticipated deviation in emerging experience compared to the underlying historic actual experience or agreed future management actions where considered realistic and objective.

As part of the assumption setting process, any material deviation in emerging experience compared to previous estimate is considered and an appropriate adjustment to the methodology would be made in the event of any identified systematic deviation.

Judgement is applied when considering the accuracy, completeness and appropriateness of available data used to determine best estimate assumptions. Generally, the methodology applied to derive assumptions from the data is well established and the financial impact of any additional expert judgement used to set best estimate assumptions is relatively minor.

D.2.1.2.1 Economic assumptions

The overriding principle followed in setting economic assumptions is that they should reflect the economic conditions at the valuation date.

Risk free yield curve

The valuation interest rate is based on a risk free yield curve over the projection period. The risk free rate used is calculated based on the methodology specified by EIOPA, which is applied to construct zero coupon base rates from the underlying swap rates.

Unit growth

For the cash flow projections, an assumption regarding the rate of future growth in the value of funds under management for existing contracts is required. The assumption made is that the growth rate before charges is the same as the risk free discount rate.

D.2.1.2.2 Non-economic assumptions

Expenses

The cash flow projection used to calculate the best estimate liability takes into account all relevant administrative and investment management expense, including allocated overhead expenses. The expected costs are expressed as a combination of an assumed fixed component and a percentage of

funds under management for the projection, both subject to expense inflation. The latter assumption includes the expected impact of client demand for provision of enhanced services.

Persistency

Actual persistency experience is reviewed annually. The long-term persistency assumptions are set using underlying lapse experience examining observed experience and trends over a number of years.

Fee income

Expected fee income is expressed as a percentage of funds under management, based on the most recent actual experience. The best estimate basis includes projected allowance for continuing observed fee trends on the in-force business emanating from competitor action and client behaviour.

D.2.1.3 Material changes in assumptions compared to the previous reporting period

Best estimate assumptions have been reviewed and updated as part of the established annual review of relevant experience. Expense assumptions also reflect the implementation during 2020 of an improved expense allocation model within the LGIM division.

In aggregate, the impact of the revised assumptions on PMC Solvency II results for 2020 has produced an increase in Own Funds which primarily reflects favourable emerging experience compared to the previous basis.

D.2.2 Level of uncertainty associated with the value of technical provisions

The technical provisions are derived largely from the bid value of units and therefore there is relatively little uncertainty associated with the amount of technical provisions. The key criterion is that the value and nature of policyholder assets held equals the value and nature of the policyholder unit liability.

The components in the technical provisions relating to discounted projected cash flows and risk margin are based on assumptions and therefore inevitably contain some uncertainty in relation to the extent to which future actual experience may differ from the best estimate assumptions. However these components amount to less than 0.2% of the total technical provisions, since the primary component of the technical provisions is the bid value of policyholder units.

A robust assumption setting process is followed in order to ensure the uncertainty is well understood. The assumptions are primarily based on actual experience data with judgement applied to determine their continuing appropriateness.

A framework to assess the confidence in the methodology and assumptions has been established through the Group Audit Committee. The framework allocates a status to the confidence in the assumption and methodology, based on a mixture of qualitative and quantitative criteria. The criteria set out in the framework and the initial assessments have been challenged and validated by experienced actuaries and accountants throughout the business, and details are included in the annual Actuarial Function Report presented to the Board.

D.2.3 Material differences between IFRS and Solvency II valuation

Given the nature of the Company's business, the main difference in the valuations of the unit-linked business under the two reporting standards is the inclusion in the Solvency II valuation of a discounted value of assumed future projected cashflows on in-force business. This is included as a deduction within Solvency II technical provisions.

As described earlier, for the Solvency II valuation insurers are required to hold a risk margin as an addition liability within technical provisions.

For IFRS, technical provisions do not include the value of projected cashflows or risk margin, and instead directly reflect the bid value of units for linked contracts. As such, no projected experience assumptions are required for IFRS purposes. Consequently for IFRS there is no uncertainty or variability created by actual experience differing from assumptions.

The defined Solvency II lines of business are not used for the Company's IFRS reporting.

The following table provides a summary of the valuation differences for the unit-linked business.

Unit-linked business (£m)	2020	2019
IFRS liabilities for unit-linked contracts	344,806	322,392
Difference in liability valuation basis	(742)	(576)
Risk margin	60	50
SII technical provisions	**344,124**	**321,866**

The impact of valuation basis differences relating to the very small (£2m) book of annuities in payment is not material.

D.2.4 Reinsurance recoverables

The very small book of annuities in payment is 100% reinsured to another insurer within the Legal & General Group. In addition to the risk mitigation provided by this arrangement, the reinsurer also provides all required administration and valuation services for the relevant contracts. The reinsurance arrangement has no basis risk.

As stated in section D.1.1.4 above, the amount of reinsurance recoverables is not financially material.

Given the nature of the reinsurance contracts, there are no time differences between recoveries and direct payments that would impact the calculation of amounts recoverable.

D.3 OTHER LIABILITIES

A summary of liabilities other than technical provisions on the Solvency II valuation basis is set out in the following table.

Liabilities other than Technical Provisions (£m)	2020	2019
Deferred tax liabilities	129	89
Insurance & intermediaries payables	103	97
Payables (trade, not insurance)	11	11
Any other liabilities, not elsewhere shown	158	130
Total Other liabilities	**402**	**327**

D.3.1 Solvency II valuation for each material class of other liabilities

There have been no changes made to the relevant recognition and valuation bases used or on estimations during the reporting period.

D.3.1.1 Deferred tax liabilities

At the valuation date, the Company did not have any deferred tax liability on the IFRS basis. An additional net deferred tax liability is held on the Solvency II balance sheet. This reflects assumed tax payable on the present value of the assumed projected future cashflows on the Solvency II basis, adjusted appropriately for the Solvency II balance sheet risk margin and non-recognition of IFRS

deferred acquisition costs. The amount of the calculated deferred tax appears directly as a difference between the Solvency II and IFRS balance sheet positions.

D.3.1.2 Insurance & intermediaries payables

These are recognised and valued in accordance with IFRS. The balance primarily relates to payments in transit to clients, representing the bid value of units disinvested.

D.3.1.3 Any other liabilities

These are recognised and valued in accordance with IFRS, and primarily relate to intra-group balances and accrued income tax liabilities.

D.3.2 Material differences between IFRS and Solvency II valuation

Other than the difference described above relating to deferred tax liabilities, there are no material differences in the bases, methods and main assumptions used for the valuation of other liabilities for Solvency II purposes compared to the valuation in the IFRS financial statements.

As described in section D.1.2 above, there are certain presentational differences which have zero net impact on the balance sheet position.

The main relevant presentational difference is that under Solvency II all assets held for linked contracts are consolidated and reported as a single distinct asset class, whereas in the IFRS financial statements the underlying assets and liabilities within the unit-linked funds are separated out and shown according to the nature of each particular instrument. As such the total value of liabilities shown in the IFRS financial statements is higher than that shown in the Solvency II balance sheet by £6bn, with a correspondingly higher value of assets. The main component of this difference relates to the presentational treatment of the fair value of derivative liabilities within unit-linked funds.

D.4 ALTERNATIVE METHODS FOR VALUATION

A minority (approximately 1%) of instruments are valued using unobservable market inputs. All such instruments are held within unit-linked funds and the designated asset value is exactly matched by a policyholder unit liability of identical amount.

In certain circumstances, the fair values of financial instruments are measured using valuation techniques that incorporate assumptions that are not evidenced by prices from observable current market transactions in the same instrument and are not based on observable market data. Illiquid market conditions have resulted in inactive markets for certain of the Company’s financial instruments. As a result, there is generally no or limited observable market data for these assets and liabilities. Fair value estimates for financial instruments deemed to be in an illiquid market are based on judgement regarding current economic conditions, liquidity discounts, currency, credit and interest rate risks, loss experience and other factors. These fair values are estimates and involve considerable uncertainty and variability as a result of the inputs selected and may differ significantly from the values that would have been used had a ready market existed. As a result, such calculated fair value estimates may not be realisable in an immediate sale or settlement of the instrument. In addition, changes in the underlying assumptions used in the fair value measurement technique could significantly affect these fair values estimates.

Fair values are subject to a control framework designed to ensure that input variables and outputs are assessed independent of the risk taker. These inputs and outputs, including appropriate comparison against previous experience where relevant, are reviewed and approved by a valuation committee.

The following table shows the financial instruments valued using unobservable market inputs at the balance sheet date.

Assets valued using alternative techniques	**£ m**
Unquoted investments in property vehicles	550
Property fund income strips	289
Suspended securities	66
Investment property	3,803
Total (all unit-linked)	**4,708**

Unquoted investments in property vehicles and direct holdings in investment property are valued by independent valuers on the basis of open market value as defined in the appraisal and valuation manual of the Royal Institute of Chartered Surveyors. Valuation techniques may include discounted cash flow calculations using net current rent, and estimated and terminal values. They may also include yield methodology calculations using market rental values capitalised with a market capitalisation rate. Both of these are then further validated against actual market transactions to produce a final valuation.

The valuation of all the above instruments for Solvency II purposes is identical to the valuation in the IFRS financial statements.

D.5 ANY OTHER INFORMATION

The above sections D.1 to D.4 inclusive contain all material information regarding the valuation of assets and liabilities for solvency purposes.

E. CAPITAL MANAGEMENT

E.1 OWN FUNDS

E.1.1 Objectives, policies and processes for managing Own Funds

There have been no material changes to the objectives, policies, and processes employed to manage the Company's own Funds.

The Company aims to manage its capital resources to maintain financial strength and policyholder security. Capital is managed such that the total available Own Funds exceeds a Solvency Capital Requirement (SCR) calculated in accordance with Solvency II regulations.

In line with this aim, the implied post-dividend coverage ratio on the Solvency II basis is one of our key metrics when recommending our annual dividend payment to our parent holding company.

The SCR is set such that the Company remains solvent following a 1-in-200 year stress event (i.e. a 99.5% confidence level over a one year period). Our capital management policy is to hold an additional buffer above the calculated regulatory SCR such that the solvency coverage ratio exceeds 196%. Since PMC does not have a published credit rating from an external credit assessment institution, the coverage ratio influences the level of capital which our insurance clients are themselves required to hold in respect of the value of assets they have invested with us. A coverage ratio at this level corresponds to the lowest risk of default for the purposes of their capital calculations under the Solvency II Directive. This is the same level of default risk assigned for capital calculations under the Solvency II Directive for individual entities with a published credit rating of AA or better.

The PMC Board and the PMC Governance Committee monitor the solvency capital position at least quarterly, enabling any appropriate actions to be identified as and when necessary to ensure compliance with the capital management policy.

Assets held to cover the SCR are localised in the UK or Ireland, and are invested directly or indirectly in short-dated Sterling-denominated liquid instruments, such as UK gilts, so as to ensure appropriate security, quality, and liquidity of those assets.

The capital coverage of Own Funds is projected over a five-year planning horizon through the annual ORSA and builds on the overall strategic plan and divisional business plan. Performance against plan is monitored on a regular basis, and is used to inform the dividend recommendation.

E.1.2 Structure, amount, and quality of basic Own Funds

All of the Company's Own Funds are unrestricted Tier 1 basic Own Funds and there are no ancillary Own Funds. As such, there are no ineligible Own Funds for the purpose of covering the SCR and MCR. This was also the case at the end of the previous financial reporting period.

The eligible amount of Solvency II Own Funds to cover the SCR and MCR as at 31 December 2020 was £928m (2019: £795m). This corresponded to a solvency capital coverage ratio of 214% (2019: 224%).

The balance sheet figures are dominated by the value of unit-linked assets and corresponding matching bid value of policyholder unit liabilities, which are equal. Therefore movements in Own Funds are largely driven by the emerging retained profits from the unit-linked book and changes in the discounted present value of assumed future cashflows recognised on the Solvency II balance sheet.

None of the Company's Own Funds are subject to transitional arrangements and there are no ancillary items.

No deductions are applied to Own Funds and there are no material restrictions affecting their availability or transferability.

E.1.3 Differences between IFRS equity and SII Own Funds

The following table shows a high level reconciliation between the equity as shown in the Company's financial statements and the excess of assets over liabilities as calculated for Solvency II purposes.

Summary reconciliation (£m)	**2020**	**2019**
IFRS equity	**376**	**360**
Difference in liability valuation basis	742	576
Risk margin	(60)	(50)
Deferred tax	(129)	(89)
Deferred acquisition costs	(1)	(1)
Solvency II Own Funds	**928**	**795**

The difference between the amount of Solvency II Own Funds compared with IFRS equity is a result of the additional liability components (additions and deductions) on the balance sheet which are specific to Solvency II and therefore not included in the IFRS liabilities. As at 31 December 2020, these comprise:

- A liability valuation basis difference of £742m, which represents a discounted value of assumed future projected pre-tax cashflows from existing business, as described in section D.2 above. This increases Solvency II Own Funds. In the Solvency II balance sheet, this value is presented as a deduction within the technical provisions rather than as an asset.
- Risk margin of £60m, which reduces Own Funds
- A deferred tax liability of £129m, which reduces Own Funds. This primarily relates to assumed tax on the future projected cashflows.

In aggregate, these differences result in lower Solvency II liabilities by £553m compared with IFRS liabilities and therefore a higher value of Own Funds for Solvency II by the same amount.

In addition, deferred acquisition costs of £1m are an allowable asset on the IFRS balance sheet but are deducted from Own Funds for Solvency II purposes.

E.1.4 Reconciliation reserve

The Company's Own Funds equal the total value of assets less liabilities under Solvency II, and are comprised of a small amount (£0.1m) of paid-in share capital, plus a reconciliation reserve. The reconciliation reserve equals IFRS retained earnings plus the Solvency II adjustments as described in section E.1.3 above.

E.1.5 Significant changes in Own Funds

During the reporting year, the Company declared and paid interim dividends totalling £194m to its parent company, compared to post-tax operating profits earned over the period of £210m.

In addition, the annual revision to the Solvency II valuation assumption basis, together with growth in the value of unit-linked pooled funds under management, increased Solvency II Own Funds by £116m over the reporting period.

E.2 SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

E.2.1 Solvency Capital Requirement (SCR)

The SCR at 31 December 2020 was £434m (2019: £355m), calculated using the internal model approved by the PRA. No capital add-on applies, and no element of the SCR is subject to supervisory assessment.

The following table sets out the movement in SCR over the financial year:

Net SCR movement	**£ m**
SCR as at 31 December 2019	355
Net surplus generation, including market movements	49
Other operating and non-operating variances	30
SCR as at 31 December 2020	**434**

Net surplus generation (including market movements) includes SCR release from the back-book and addition from new business written during the year, together with the impact of changes in investment market conditions and fund mix over the period, and changes to the relevant risk-free rate economic assumptions.

Other operating and non-operating variances include the impact of experience variation, changes to valuation and capital calibration assumptions, changes to planned volumes of new business, and tax rate changes.

Further information on the SCR by risk categories is provided in the QRT S.25.03 which is included in the Appendix of this report.

E.2.2 Minimum Capital Requirement (MCR)

The MCR at 31 December 2020 was £195m (2019: £160m).

The size and nature of the Company's business means that the MCR is defined by Article 248 of the Delegated Acts to be 45% of the calculated SCR, and therefore changes to the total SCR lead directly to proportional changes to the MCR.

The change in the amount of the MCR over the year has no material impact on the Company's business or strategy.

Further detail of the inputs used to calculate the MCR can be found in the QRT S.28.01 which is included in the Appendix of this report.

E.3 USE OF THE DURATION-BASED EQUITY RISK SUB-MODULE IN THE CALCULATION OF THE SOLVENCY CAPITAL REQUIREMENT

The duration-based equity risk sub-module is not used in the calculation of the Company's SCR.

E.4 DIFFERENCES BETWEEN THE STANDARD FORMULA AND ANY INTERNAL MODEL USED

E.4.1 Internal Model

Legal & General Group Plc has chosen to adopt an Internal Model approach to calculate the SCR for all of the material insurance companies in the Group. The model has received the required regulatory approvals and the Company accordingly uses the Internal Model to determine its SCR.

E.4.1.1 Use of the Internal Model

The Internal Model plays a central role in the measurement of risks, as the model translates identified risk exposures into risk-based capital requirements.

The output from the Internal Model is a key component of various activities as follows:

- Risk management, including experience monitoring of key risks using the internal model risk distribution for the relevant risk and the associated impact on SCR.
- Capital management, for example to monitor performance against the target capital coverage ratio.
- Business planning. For example, the projected business plan over the next five years includes corresponding projections of the capital requirement using the internal model SCR output. The model output is also used to inform dividend decisions and expectations over the projected period.
- Public reporting and disclosure, such as this Solvency and Financial Condition Report.
- Supervisory reporting under the Solvency II regime.

Effective management information using the Internal Model output informs and supports decision-making and risk assessment responsibilities.

E.4.1.2 Scope of the Internal Model

In order that the Internal Model is a good fit to the business, the modelling approach reflects the nature, scale and complexity of the risks inherent in those business activities. The Internal Model covers all of the Company's material and quantifiable risk exposures.

The Internal Model provides a full probability distribution of capital outcomes for each material risk type within each category.

The model covers existing business and one year's expected new business.

Given the nature of the Company's business, there is no need to define more granular level business units within the model, as PMC is a mono-line company (i.e. operating in one specific financial area) focusing on the fund administration and management of unit-linked pension policies.

E.4.1.3 Methods used in the Internal Model

PMC determines best estimate assumptions for future lapses, expenses and income. Experience investigations are conducted at least annually in order to ensure that the best estimate assumptions are compared to, and reflect where appropriate, the underlying actual experience.

The Solvency II liability value is calculated using a model which projects cash flows from the existing funds under management, allowing for the best estimate lapses, expenses and income. The resulting projected cashflows are discounted using the risk-free discount rate to give the present value of the

assumed future expected cashflows arising from the existing business on the Solvency II liability valuation basis.

A probability distribution is determined for each relevant risk, with an associated correlation structure. Together, these specify possible outcomes over one year and the probability of those outcomes occurring.

The cashflow projection model is run on 5,000 scenarios drawn from the risk distributions, in conjunction with a formula fit algorithm, in order to derive an appropriate formula to represent the discounted cashflow value on the Solvency II basis.

The derived formula is then loaded into the Internal Model's primary calculation engine which runs 500,000 scenarios randomly sampled across all risk drivers. The simulations are constructed in such a way that each risk driver follows a predefined distribution and that the relationship between any two risk drivers follows a predefined correlation assumption. The simulations can be looked at as a sample generated from a multidimensional distribution. The multidimensional distribution is built from the risk driver distributions and a copula function which represents the dependency structure between the risks. The results of these runs are then ranked in order to determine the solvency capital requirement at the biting scenario corresponding to a 99.5th percentile. Final capital requirements are determined using a smoothing process, whereby rather than taking the 99.5th percentile capital requirement as the exact 2,500th worst outcome out of 500,000 scenarios, a weighted average of a number of simulations around the 99.5th percentile is used, incorporating scenario outcomes immediately above the 99.5th percentile point and immediately below it.

Since the impact of market risks on PMC is second order only, stresses on policyholder funds are typically derived using summarised or proxy data rather than the actual individual asset data. For example, a model point group may be assessed with representative summary bond and equity assets such as a 40% bond / 60% equity portfolio.

For shareholder assets, each asset is considered individually using its specific relevant data or, for a minor amount held in collective investment undertakings, its specific target underlying asset allocation.

E.4.2 Main differences compared to the standard formula approach

In line with Article 101(3) of the Solvency II Directive, the SCR calculated using the Internal Model corresponds to the value-at-risk of the Company's basic Own Funds subject to a confidence level of 99.5% over a one-year period. This calibration standard is the same as for the Standard Formula. However, the detailed calculations differ in their sophistication and the extent to which they have been tailored to the Company's own risk profile.

Standard Formula is not the Company's regulatory basis for calculating its SCR. The Internal Model has received the appropriate regulatory approval.

The main differences are as follows:

- *Life expenses and income risks* - The Internal Model includes an additional risk (which is not covered by the Standard Formula) in respect of variation in projected fee income compared to best estimate expectations. In addition, expense risk within the Internal Model is calibrated higher (i.e. more severe) than the Standard Formula.
- *Life lapse risk* - The Internal Model allows for potential variation in lapse experience to occur from both regular and mass lapses concurrently, whereas the Standard Formula takes the higher of the two stress results. In the Internal Model, the lapse risk stress is calibrated lower than the Standard Formula stress, reflecting the scale and nature of the Company's business.

- *Operational risk* – The Internal Model takes the 99.5th percentile of a combined loss distribution for operational risk losses over one year. The Standard Formula adopts a factor-based approach.
- *Aggregation and diversification* - The Internal Model aggregates the risks using a Monte Carlo simulation approach and a t-copula. The diversification approach implicit in the Standard Formula is based upon correlations at a single stress point using a sum of squares approach.
- *Counterparty default risk* – Where the Company utilises reinsurance arrangements to expand the range of investment fund choices available to its policyholders, the Internal Model allows more appropriately for the fact that the underlying counterparty risk is borne by the policyholders invested in the relevant unit-linked fund and not by the Company. The Standard Formula overstates the risk to the Company relating to reinsurance of unit-linked fund assets.
- *Market risk* – Group-wide calibrations for market risk are used by the Internal Model and these differ from the corresponding Standard Formula calibrations. However, given the unit-linked nature of the Company's business, market risks are primarily borne by policyholders and the differences in market risk calibrations do not materially impact the overall SCR for the Company.

E.4.3 Internal Model data

In order to calculate our Solvency Capital Requirement our Internal Model is provided with data about our assets, liabilities and the risks associated with each of these.

In order to assess the risks associated with our assets and liabilities we use a wide range of economic, market and insurance data and operational risk experience. Our material risks are primarily assessed using internal historical experience and any relevant external data and forecasts. In the calibration of mass lapse risk and of operational risk, since actual data of relevant extreme events is very scarce, the available data is supplemented by the judgement of experts with relevant knowledge, experience and understanding of the risks inherent in the business.

Data are used to assess:

- the likelihood and scale of individual risks; and
- how these risks are correlated, i.e. the extent to which a change in one risk is likely to coincide with change in another risk.

Our Solvency II data governance framework has been designed to instil best practice in managing data risk and in improving data quality to add robustness to model processes and outputs. The Solvency II Data Management Policy sets out the Group's requirements for managing data risk on data used to develop, populate, operate and validate the Internal Model. The data management control framework provides the conditions for business areas to ensure that all Internal Model data are recorded and that associated data risks and quality are managed effectively. The framework includes regular assessments of data quality and controls effectiveness.

The appropriateness of all internal and external data is considered and justified by the experts in each area of risk, and these justifications are independently validated.

E.5 NON-COMPLIANCE WITH THE MINIMUM CAPITAL REQUIREMENT AND NON-COMPLIANCE WITH THE SOLVENCY CAPITAL REQUIREMENT

There have been no instances of non-compliance with the MCR or SCR at any time over the reporting period.

The Company has held capital exceeding regulatory requirements throughout the reporting period and continues so to do.

E.6 ANY OTHER INFORMATION

All material information regarding the capital management of the Company has been covered in the above sections E.1 to E.5 inclusive.

APPENDIX – QUANTITATIVE REPORTING TEMPLATES (QRTS)

All values in these templates are shown in £'000s.

S.02.01.02 BALANCE SHEET

		Solvency II value
Assets		C0010
Intangible assets	R0030	
Deferred tax assets	R0040	
Pension benefit surplus	R0050	
Property, plant & equipement held for own use	R0060	
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	425,177
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	
Equities	R0100	
Equities - listed	R0110	
Equities - unlisted	R0120	
Bonds	R0130	229,928
Government Bonds	R0140	229,928
Corporate Bonds	R0150	
Structured notes	R0160	
Collateralised securities	R0170	
Collective Investments Undertakings	R0180	31,287
Derivatives	R0190	
Deposits other than cash equivalents	R0200	163,962
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	344,806,404
Loans and mortgages	R0230	
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	
Reinsurance recoverables from:	R0270	1,570
Non-life and health similar to non-life	R0280	
Non-life excluding health	R0290	
Health similar to non-life	R0300	
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	1,570
Health similar to life	R0320	
Life excluding health and index-linked and unit-linked	R0330	1,570
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	67,192
Reinsurance receivables	R0370	
Receivables (trade, not insurance)	R0380	
Own shares (held directly)	R0390	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	
Cash and cash equivalents	R0410	6,431
Any other assets, not elsewhere shown	R0420	149,256
Total assets	R0500	345,456,030

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	
Technical provisions – non-life (excluding health)	R0520	
Technical provisions calculated as a whole	R0530	
Best Estimate	R0540	
Risk margin	R0550	
Technical provisions - health (similar to non-life)	R0560	
Technical provisions calculated as a whole	R0570	
Best Estimate	R0580	
Risk margin	R0590	
Technical provisions - life (excluding index-linked and unit-linked)	R0600	1,570
Technical provisions - health (similar to life)	R0610	
Technical provisions calculated as a whole	R0620	
Best Estimate	R0630	
Risk margin	R0640	
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	1,570
Technical provisions calculated as a whole	R0660	
Best Estimate	R0670	1,570
Risk margin	R0680	
Technical provisions – index-linked and unit-linked	R0690	344,124,238
Technical provisions calculated as a whole	R0700	
Best Estimate	R0710	344,064,207
Risk margin	R0720	60,030
Other technical provisions	R0730	
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	
Pension benefit obligations	R0760	
Deposits from reinsurers	R0770	
Deferred tax liabilities	R0780	129,363
Derivatives	R0790	
Debts owed to credit institutions	R0800	
Financial liabilities other than debts owed to credit institutions	R0810	
Insurance & intermediaries payables	R0820	103,494
Reinsurance payables	R0830	
Payables (trade, not insurance)	R0840	11,473
Subordinated liabilities	R0850	
Subordinated liabilities not in Basic Own Funds	R0860	
Subordinated liabilities in Basic Own Funds	R0870	
Any other liabilities, not elsewhere shown	R0880	158,146
Total liabilities	R0900	344,528,284
Excess of assets over liabilities	R1000	927,746

S.05.01.02 PREMIUMS, CLAIMS AND EXPENSES BY LINE OF BUSINESS

		Line of Business for: **life insurance obligations**						**Life reinsurance obligations**		Total
		Health insurance	Insurance with profit participation	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	
		C0210	**C0220**	**C0230**	**C0240**	**C0250**	**C0260**	**C0270**	**C0280**	**C0300**
Premiums written										
Gross	**R1410**			24,689,397	0				16,963,113	41,652,510
Reinsurers' share	**R1420**			0	0				0	0
Net	**R1500**			24,689,397	0				16,963,113	41,652,510
Premiums earned										
Gross	**R1510**			24,689,397	0				16,963,113	41,652,510
Reinsurers' share	**R1520**			0	0				0	0
Net	**R1600**			24,689,397	0				16,963,113	41,652,510
Claims incurred										
Gross	**R1610**			42,799,354	303				7,985,968	50,785,624
Reinsurers' share	**R1620**			0	303				0	303
Net	**R1700**			42,799,354	0				7,985,968	50,785,321
Changes in other technical provisions										
Gross	**R1710**			0	0				0	0
Reinsurers' share	**R1720**			0	0				0	0
Net	**R1800**			0	0				0	0
Expenses incurred	**R1900**			267,466	0				62,392	329,858
Other expenses	**R2500**									62,101
Total expenses	**R2600**									391,959

Note: Since the home country (UK) represents more than 90% of the total business written, the S.05.02.01 QRT showing a detailed split of other countries is not required to be reported.

S.12.01.02 LIFE AND HEALTH SLT TECHNICAL PROVISIONS

		Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health
				Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees	
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090
Technical provisions calculated as a whole	**R0010**								
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	**R0020**								
Technical provisions calculated as a sum of BE and RM									
Best Estimate									
Gross Best Estimate	**R0030**			265,790,967	829,510		1,570		
Total recoverables from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	**R0040**						1,570		
Recoverables from reinsurance (except SPV and Finite Re) before adjustment for expected losses	**R0050**						1,570		
Recoverables from SPV before adjustment for expected losses	**R0060**								
Recoverables from Finite Re before adjustment for expected losses	**R0070**								
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0080**						1,570		
Best estimate minus recoverables from reinsurance/SPV and Finite Re	**R0090**			265,790,967	829,510		0		
Risk Margin	**R0100**		46,480			0			
Amount of the transitional on Technical Provisions									
Technical Provisions calculated as a whole	**R0110**								
Best estimate	**R0120**								
Risk margin	**R0130**								
Technical provisions - total	**R0200**		266,666,957			1,570			

		Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance	Accepted reinsurance				Accepted reinsurance	**Total (Life other than health insurance, incl. Unit-Linked)**
				Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life accepted insurance contracts and relating to insurance obligation other than health insurance obligations	
		C0090	C0100	C0110	C0120	C0130	C0140	C0150
Technical provisions calculated as a whole	**R0010**							
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	**R0020**							
Technical provisions calculated as a sum of BE and RM								
Best Estimate								
Gross Best Estimate	**R0030**		77,443,731		77,443,731			344,065,777
Total recoverables from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	**R0040**							1,570
Recoverables from reinsurance (except SPV and Finite Re) before adjustment for expected losses	**R0050**							1,570
Recoverables from SPV before adjustment for expected losses	**R0060**							
Recoverables from Finite Re before adjustment for expected losses	**R0070**							
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0080**							1,570
Best estimate minus recoverables from reinsurance/SPV and Finite Re	**R0090**		77,443,731					344,064,207
Risk Margin	**R0100**		13,550		13,550			60,030
Amount of the transitional on Technical Provisions								
Technical Provisions calculated as a whole	**R0110**							
Best estimate	**R0120**							
Risk margin	**R0130**							
Technical provisions - total	**R0200**		77,457,281					344,125,808

S.23.01.01 OWN FUNDS

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		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						
Ordinary share capital (gross of own shares)	R0010	100	100		0	
Share premium account related to ordinary share capital	R0030					
Iinitial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	927,646	927,646			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
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						
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					
Deductions						
Deductions for participations in financial and credit institutions	R0230	0				
Total basic own funds after deductions	R0290	927,746	927,746		0	
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	927,746	927,746		0	
Total available own funds to meet the MCR	R0510	927,746	927,746		0	
Total eligible own funds to meet the SCR	R0540	927,746	927,746		0	
Total eligible own funds to meet the MCR	R0550	927,746	927,746		0	
SCR	R0580	434,200				
MCR	R0600	195,390				
Ratio of Eligible own funds to SCR	R0620	213.67%				
Ratio of Eligible own funds to MCR	R0640	474.82%				

		C0060	
Reconciliation reserve			
Excess of assets over liabilities	R0700	927,746	
Own shares (held directly and indirectly)	R0710		
Foreseeable dividends, distributions and charges	R0720	0	
Other basic own fund items	R0730	100	
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740		
Reconciliation reserve	R0760	927,646	
Expected profits			
Expected profits included in future premiums (EPIFP) - Life business	R0770		
Expected profits included in future premiums (EPIFP) - Non- life business	R0780		
Total Expected profits included in future premiums (EPIFP)	R0790		

S.25.03.21 SOLVENCY CAPITAL REQUIREMENT

Unique number of component	Components description	Calculation of the Solvency Capital Requirement
C0010	**C0020**	**C0030**
70100I	Operational risk	190,300
30600I	Expense risk	321,000
30400I	Mass lapse risk	430,000
30900I	Income risk	157,800
10400I	Equity risk	220,000
30500I	Regular lapse risk	84,400
10600I	Property risk	25,600
10300I	Interest rate risk	15,600
10700I	Spread risk	14,200
20100I	Type 1 counterparty risk	1,200
11000I	Other market risk	-500
19900I	Diversification within market risk	-29,400
39900I	Diversification within life underwriting risk	-394,100
80400I	Future profits from life new business	-98,300
80300I	Loss-absorbing capacity of deferred tax	-101,800

Calculation of Solvency Capital Requirement		**C0100**
Total undiversified components	**R0110**	836,000
Diversification	**R0060**	-401,800
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC (transitional)	**R0160**	
Solvency capital requirement excluding capital add-on	**R0200**	434,200
Capital add-ons already set	**R0210**	
Solvency capital requirement	**R0220**	**434,200**
Other information on SCR		
Amount/estimate of the overall loss-absorbing capacity of technical provisions	**R0300**	
Amount/estimate of the overall loss-absorbing capacity of deferred taxes	**R0310**	-101,800
Total amount of Notional Solvency Capital Requirements for remaining part	**R0410**	
Total amount of Notional Solvency Capital Requirement for ring fenced funds	**R0420**	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	**R0430**	
Diversification effects due to RFF nSCR aggregation for article 304	**R0440**	
Net future discretionary benefits	**R0460**	

S.28.01.01 MINIMUM CAPITAL REQUIREMENT

Linear formula component for life insurance and reinsurance obligations

		C0040
MCR_L Result	**R0200**	2,408,449

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	**C0060**
Obligations with profit participation - guaranteed benefits	**R0210**		
Obligations with profit participation - future discretionary benefits	**R0220**		
Index-linked and unit-linked insurance obligations	**R0230**	344,064,207	
Other life (re)insurance and health (re)insurance obligations	**R0240**		
Total capital at risk for all life (re)insurance obligations	**R0250**		

Overall MCR calculation

		C0070
Linear MCR	**R0300**	2,408,449
SCR	**R0310**	434,200
MCR cap	**R0320**	195,390
MCR floor	**R0330**	108,550
Combined MCR	**R0340**	195,390
Absolute floor of the MCR	**R0350**	3,338
		C0070
Minimum Capital Requirement	**R0400**	195,390

Note: The defined Linear MCR formula does not provide a meaningful figure given the nature of the PMC business.