

# Solvency and Financial Condition Report 2019

Swiss Life (Liechtenstein) AG

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# List of Abbreviations

ALCO Asset Liability Committee ALM Asset Liability Management

AMSB Administrative, Management or Supervisory Body

BoD Board of Directors
DTL Deferred Tax Liability

ERM Enterprise Risk Management

ExB Executive Board

GRC Group Risk Committee ICS Internal Control System

IFRS International Financial Reporting Standards

IRC Investment and Risk CommitteeMCR Minimum Capital RequirementMTP Mid-Term-Planning Process

OF Own Funds

ORSA Own Risk and Solvency Assessment

OSN Overall Solvency Need
PVFP Present Value Future Profits
SCR Solvency Capital Requirement

SII Solvency II

SLLIE Swiss Life Liechtenstein SST Swiss Solvency Test

# A Business and Performance

#### A.1 Business

This Solvency and Financial Condition Report ("SFCR" or the "Report") is prepared in accordance with Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 ("Solvency II").

The report covers the financial year 2019 and is prepared for "Swiss Life (Liechtenstein) AG", Industriestrasse 56, 9491 Ruggell, Liechtenstein ("SLLIE" or the "Company"). The Company is incorporated in Liechtenstein as a limited liability company ("Aktiengesellschaft") since 2004 and is entirely owned by "Swiss Life Holding AG" through the holding structure shown in the annex.

The Company is supervised by the Financial Market Authority Liechtenstein based at Landstrasse 109, Postfach 279, 9490 Vaduz, Liechtenstein ("FMA"). The supervisory authority of SL Group is the Swiss Financial Market Supervisory Authority FINMA based at Laupenstrasse 27, 3003 Bern, Switzerland.

PricewaterhouseCoopers AG, Birchstrasse 160, 8050 Zurich, Switzerland ("PwC"), is serving as external auditor for SLLIE.

SLLIE is active in the following lines of business ("LoB") for individual life insurance policies:

- -Index linked and unit linked life insurance;
- -Life insurance (excluding index linked and unit linked);
- Non-life insurance (health) licensed since October 2019. Sales activities should start in the first half of 2020.

These correspond to the following statutory lines of business as defined by law<sup>1</sup> in Liechtenstein:

- -line of business 1: life insurance ("Lebensversicherung");
- -line of business 3: unit-linked life insurance ("Anteil-beziehungsweise fondsgebundene Lebensversicherung");
- -line of business 6: capitalisation operations ("Kapitalisationsgeschäfte");
- -line of business 2: non-life, health ("Krankheit").

The traditional life insurance LoB is closed to new business and contains capital and annuity insurance policies with profit participation. The unit-linked portfolio of SLLIE contains products with and without guarantees. Capitalisation products consist of a closed portfolio of unit-linked products for which the Company bears no insurance risk.

In September 2016, Swiss Life Group ("SL Group" or "the Group") launched the new sub-brand Swiss Life Global Solutions, which also includes most business underwritten by SLLIE.

This report represents the fourth SFCR disclosure after application of the Solvency II Directive.

<sup>&</sup>lt;sup>1</sup> VersAG Annex 2

#### A.2 Underwriting performance

This section contains information on the Company's underwriting performance based on the figures shown in template S.05.01.02 and S.05.02.01 (see Appendix). The underwriting performance is based on statutory reporting.

#### Premium written:

The gross written premium amounts to CHF 376.3m (previous year CHF 262.2m) consisting of the following three main countries: CHF 278.8m from the business written in Switzerland, CHF 37.8m from Italy, CHF 37.8m from Ukraine.

Thereof CHF 2.5m (p.y. CHF 1.2m) are written in the LoB "Insurance with profit participation" and CHF 373.8m (p.y. CHF 261.0m) in the LoB "Index-linked and unit-linked insurance".

#### Claims incurred:

Gross claims incurred are CHF 0.9m accrued in the LoB "Insurance with profit participation" (p.y. CHF 0.8m) and CHF 524.7m (p.y. CHF 491.3m) in the LoB "Index-linked and unit-linked insurance". The majority of the claims are due to full or partial surrenders.

#### Changes in technical provisions:

The change in technical provisions is CHF -2.1m (p.y. CHF 0.6m) recorded in the LoB "Insurance with profit participation" and CHF -72.0m (p.y. CHF 628.6m) in "Index-linked and unit-linked insurance".

#### **Expenses incurred:**

Expenses incurred in the LoB "Insurance with profit participation" are CHF 0.7m (p.y. CHF 0.8m) and CHF 17.2m (p.y. CHF 17.3m) in "Index-linked and unit-linked insurance".

#### A.3 Investment performance

In 2019, the Company recorded an investment result of CHF 0.0m (p.y. CHF -0.5m).

#### Investment Income

In CHF million		
	2019	2018
Income from participations	0.2	0.1
Income from other investments	0.2	0.2
Net realized gains on investments	0.1	0.1
Investment expenses	-0.4	-0.9
Investment result	0.0	-0.5

The majority of the investment income from other investments is related to fixed-income securities.

#### A.4 Performance of other activities

The next table shows the composition of the Company's statutory profit before tax.

In CHF million		
	2019	2018
Insurance result	10.3	11.7
Other income from insurance operations	11.7	5.7
Other expenses from insurance operations	-13.2	-11.7
Profit on ordinary operations	8.9	5.8
Extraordinary expenses	0.0	0.0
Profit before tax	8.9	5.8

The profit before tax for 2019 is CHF 8.9m (+53% compared to previous year). This increase is driven by the result improvement for the LoB 3, mainly driven by margin management and strict cost discipline. Further, the goodwill has been fully written down by March 2019.

# B System of Governance

#### B.1 General information on the system of governance

The Board of Directors (BoD) is the administrative, management and supervisory body (AMSB) of SLLIE and is in charge of the management of the business. It is vested with the broadest powers to perform all acts of administration and management in accordance with the corporate objects of SLLIE. The BoD is constituted according to applicable local law and comprises the following persons:

- -CEO of Market Unit International as Chairman;
- CFO of Market Unit International;
- -Head Corporate Mandates of Swiss Life Group;
- -A representative of the Legal department of Swiss Life Group.

The BoD assumes all non-transferable and inalienable tasks and obligations as provided for by applicable law. In particular, the BoD monitors compliance with local laws and provide directives regarding risk control. Furthermore, the BoD ensures the establishment of adequate audit functions. The BoD role is to:

- -Decide on strategic objectives;
- -Prepare the agenda for the general meeting and implement its resolutions;
- -Draw up the rules necessary for the orderly conduct of the business and instruct management accordingly;
- -Supervise the persons entrusted with management and representation, having regard to the correct execution of the latter pursuant to the law, the articles and the regulations;
- Be regularly informed concerning the course and the conduct of the business.

Subject to the inalienable tasks and competencies according to applicable local law, the BoD delegates the responsibilities of running the business (including proposal, implementation of strategies and monitoring of plan execution, performance and compliance) to SLLIE's Business Area Management Team.

The Business Area Management Team is responsible towards the Executive Committee and the Management Committee of Market Unit International as well as to the BoD and local regulators for compliance with applicable laws. To effectively assume its responsibilities, the Executive Committee and the BoD have delegated all necessary powers to the Business Area Management Team.

Prior to any resolution of the Business Area Management Team, the following functions and or local functional governance bodies of SLLIE shall mandatorily be heard:

- -Risk and Compliance Committee;
- Function heads.

The following table depicts the key functions of SLLIE:

Key Function	Key Function Holder
Risk management function	Head Finance & Risk
Compliance function	Head Legal & Compliance
Internal audit function	Chief Audit Executive
Actuarial function	Head Actuarial Services

These are described in more detail in the remaining of this chapter.

#### Remuneration policy

SLLIE's Compensation Policy is derived from the one of Swiss Life Group. The BoD is responsible for its establishment, and its main principles are summarized in a guideline communicated and made available to all employees on the Company Intranet.

The compensation policy underpins the performance culture required by the corporate strategy and forms part of the Human Ressources policy. The aim is to retain qualified employees and recruit new, highly skilled staff.

The compensation system is to be in line with the market environment and must be competitive.

The individual overall compensation takes into account the employee's professional skills, engagement and personal performance and is independent of age, years of service or gender. It is made up of a basic salary, a variable bonus based on achievement of the annual objectives, which is generally paid in cash and possibly in shares as well as, in restricted cases, a deferred variable mid- to long-term compensation in the form of an equity compensation plan. The form and financing of fringe benefits and occupational pension solutions are market consistent.

In 2019, neither fee nor remuneration of any kind were paid to the members of the BoD.

#### System of Governance of Swiss Life Group

The AMBS of Swiss Life Group consists of the BoD and the Corporate Executive Board (ExB).

Swiss Life's system of governance comprises an adequate and transparent organisational structure, a clear assignment and separation of responsibilities as well as an effective system for the transmission of information. It comprises the necessary organisational structure, in particular the division of powers between the BoD and the ExB, an elaborated Directives System, defined key functions and clearly defined, documented decision making-processes.

The BoD is responsible for all matters that are not reserved for the consideration of the General Meeting of Shareholders (formally the supreme decision-making body of a public limited company) under the terms of the respective law or by the company's Articles of Association. In line with its non-transferable duties prescribed by law, the BoD is responsible, in particular, for the ultimate direction of the entity, as well as the supervision of the Corporate ExB.

The ExB works out the long-term objectives and strategic orientation for the BoD and ensures a goal-oriented leadership. Swiss Life's business strategy is to offer:

- -life and pensions solutions through Business Divisions / Business Areas in Switzerland, France, Germany, Liechtenstein, Luxembourg and Singapore;
- -health and non-life insurance coverage in France;
- -investment management solutions to institutional clients through Business Divisions in Switzerland, France and Germany;
- -distribution of financial products in further markets such as UK, Austria and in Central and Eastern Europe countries.

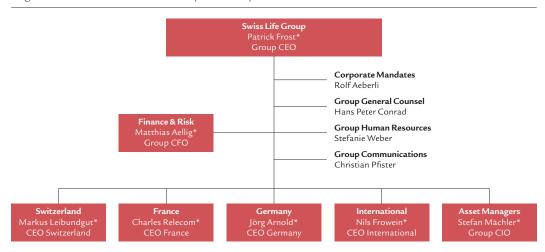
The Directives System – as outlined below – is maintained by the Group and ensures the goal-oriented implementation of the business strategy and adherence to Group standards on a Business Division level. For this purpose the organization and division of tasks within the ExB generally reflects the key business areas and functions.

The key functions are implemented on Group and local level and serve as a means of communication for the business strategy and the relevant Directives, Guidelines and Instructions as well as the reporting of the necessary information for the ExB's decision. The key functions are:

- Risk Management Function;
- -Compliance Function;
- -Internal Audit Function;
- -Actuarial Function.

The organization described above is reflected on a Business Division / Business Area level and is depicted in the Swiss Life Group's Organizational Chart (Figure 1 below).

Organizational chart Swiss Life Group as of 1 April 2020



<sup>\*</sup>Member of the Corporate Executive Board

#### Board of Directors of Swiss Life Group

In accordance with the Articles of Association, the BoD has issued Organizational Regulations setting forth the internal organizational structure and the duties and competencies of the BoD, the BoDs' committees, the Chairman of the BoD and the Corporate ExB. The Organizational Regulations are reviewed regularly and adjusted where necessary.

The Chairman of the BoD coordinates the work of the Board and the committees, and ensures reporting from the Corporate ExB to the BoD. In urgent situations, the Chairman may also determine the necessary measures and take steps falling within the scope of the competencies of the Board until the BoD takes a decision. If a timely decision cannot be reached by the BoD, the Chairman is empowered to take a decision.

The BoD meets as often as business requires, usually at least six times a year. Meetings are generally called by the Chairman of the BoD. However, any member of the BoD may request that a meeting be called, as may the Corporate ExB. In addition to the members of the Board of Directors, the Group CEO also generally attends the meetings or parts of meetings in an advisory capacity, as do other members of the Corporate ExB when required.

The BoD is supported by four standing committees. These are the Chairman's and Corporate Governance Committee, the Nomination and Compensation Committee, the Investment and Risk Committee (IRC) and the Audit Committee. The BoD may establish other committees to be entrusted with special tasks.

#### **Group Directives System**

An integral part of Swiss Life's governance system is the Group Directives System. It regulates the functional management throughout SL Group and defines the content-related and organizational principles, standards and topics.

The Group Directives System is arranged into Group topics and contains Group Directives, Group Guidelines and Group Instructions.

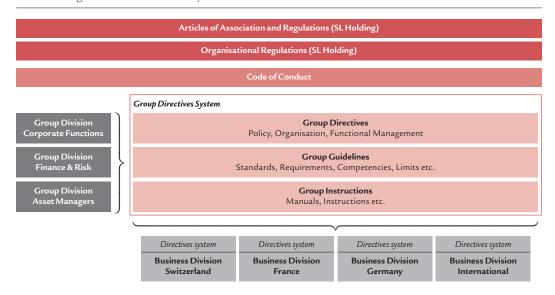
- -Group Directives set out the content-related principles (policy) and requirements as well as organizational and functional management aspects (incl. authorities' framework);
- Group Guidelines follow on from the Group Directive and set out more detailed content-based requirements and topics, as well as the minimum standards;
- -Group Instructions are based on the Group Directives and Group Guidelines and set out concrete instructions in the form of manuals, etc.

Following a standardized consultation process, involving management, functional stakeholders and responsible persons within the Business Divisions, the Group Directives and Group Guidelines are put into effect by the Group Executive Board.

The Business Divisions operate their own directives system and implement the content and objectives of the Group Directives and Group Guidelines, taking into account local laws and regulations as well as local business specifications.

Figure 2 depicts the hierarchy of regulations and the Directives system within Swiss Life Group:

Swiss Life regulations and directive system



SLLIE is included in the Business Division International, from a management perspective, which groups the insurance entities in Luxembourg, Liechtenstein and Singapore as well as the distribution channels in the United Kingdom and Eastern Europe.

The system of governance is reviewed internally on a regular basis. It is the responsibility of the Corporate Internal Audit function to plan and perform the audit. Specifically, Swiss Life's Audit Charter defines that Corporate Internal Audit has to ensure the maintenance of an adequate corporate governance. For this purpose the appropriate processes have been defined based on Swiss Life's Audit Charter<sup>2</sup>.

The processes include a planning phase where the relevant topics are identified, how the audit has to be performed and documented as well as the manner in which the results have to be reported.

The organisational structures are also mirrored locally by SLLIE.

<sup>&</sup>lt;sup>2</sup> SLG 19 Audit Charter, p. 2

#### B.2 Fit and proper requirements

Swiss Life places great importance on ensuring that all persons who fulfil key functions are fit and proper for their position. For this purpose, SL Business Division/ Business Area follows a Human Resources (HR) Cycle based on Swiss Life Group HR framework.

Therefore, the HR cycle contains the following processes which are described in the respective internal policies and ensure the AMSB as well as employees' fitness and propriety:

- -HR planning;
- -Hiring;
- Performance measurement;
- -Salary review, bonus and nomination;
- -Human capital management (including development measures);
- -Quality assurance (including personnel induced opportunities and risks assessment);
- Management/Leadership tasks.

In addition to the above processes, Swiss Life established a Code of Conduct that outlines individual responsibilities, behaviour principles for all employees and additional responsibilities for members of management. Its purpose is to offer guidance for the interactions with each other and with all persons outside of Swiss Life with whom come into contact and serves as the basis for fulfilling the proper requirement. All Employees of Swiss Life Group and its entities must commit to the mission and the values of Swiss Life and comply with the values, principles rules and guidelines for the business activities as outlined in the Code of Conduct including adherence to local laws and regulations.

Swiss Life's Compliance function plays another important role in ensuring the propriety of employees. Not only is the function responsible that employees are educated about the Code of Conduct but also that relevant processes are in place in order to foster compliant behaviour, detect non-compliant behaviour and track and report Swiss Life's employees degree of compliance to standards and local laws and regulations.

SLLIE ensures the fitness and propriety of its AMSB and employees in close alignment with SL Group. Group HR and Divisional HR organisations act in cooperation and involve where appropriate, their line management. Heads Divisional HR represent not only their Divisional/Area organisation's interests but also the Group interests in the Group HR Board.

The list of key function holders is shown in the next table.

Key Function	Key Function Holder	Name	Outsourced [yes/no]
Risk management function	Head Finance & Risk	Dario Sacco	No
Compliance function	Head Legal & Compliance	Christoph de Weck	No
Internal audit function	Chief Audit Executive	Erwin Bucher	Yes
Actuarial function	Head Actuarial Services	Dario Sacco	No

#### **B.3** Risk management system

SLLIE pursues an integrated, value-oriented risk management approach, involving both quantitative and qualitative elements. The goal is to protect customers' funds and ensure the best possible investment of risk capital, while complying with the regulatory requirements and taking into account the challenging economic conditions.

Risk management is a key component of Swiss Life's management process. The respective committees of the Corporate ExB and the BoD monitor and take decisions in the area of risk management; these are then incorporated into the annual planning process of Swiss Life. On the one hand, they comprise qualitative assessments relating to the strategy, to operational risks and to the internal control system (ICS). On the other hand, quantitative elements, such as risk budgeting and investment strategy, are included in asset and liability management. Based on risk capacity and risk appetite and taking account of regulatory provisions, limits are set in Swiss Life for the financial risks incurred, according to which the investment targets are set.

Risk management tasks are performed at all levels within Swiss Life Group by corresponding bodies, such as the IRC at the level of the BoD of the Swiss Life Group and the Group Risk Committee (GRC) at the level of the Corporate ExB.

Analogously, the Company performs these tasks on a local level.

#### Risk strategy

Swiss Life's risk strategy supports the business strategy and enables the company to grow in its businesses and markets in a sustainable and profitable way.

Swiss Life seeks to take on those risks inherent to the insurance and pension business, that are well understood and for which the expected return compensates the shareholder adequately, i.e. to assume those risks with which the associated cost of capital can be earned.

Other risks inherent to the business that cannot be avoided (e.g. operational risks) must be actively monitored and mitigated applying various techniques.

As a matter of principle, Swiss Life sets its risk appetite, i.e. how much risk it is willing to assume, in consideration of its risk capacity. The risk appetite shall not exceed the risk capacity, i.e. the amount of risk that can be taken in order to run the business in a sustainable way.

#### Risk management objectives

Key components of risk management are the systematic identification, analysis, assessment, monitoring and management of risks as well as their reporting.

#### Risk strategy techniques

For the management of risks, the following techniques are applied at Swiss Life:

Risk avoidance is the systematic avoidance of undesired risks (those expected not to compensate
the shareholder adequately). Since some of them are connected with desired risks, the below
mentioned techniques are applied subsequently;

- Risk mitigation is the systematic reduction of existing risks. This can be achieved, e.g. by hedging undesired exposures through purchase of financial instruments or by the implementation of controls;
- Risk diversification reduces risks by accepting risks, which are similar but not fully correlated. The overall risk is then lower than the sum of the individual risks;
- Risks are limited by setting thresholds so that the potential loss is limited, e.g. by limiting the equity exposure or by limiting the size of insurance coverage granted;
- Risk transformation is changing the character of an existing risk, e.g. through the purchase of re-insurance cover;
- Risk acceptance is the conscious decision to accept a risk, if necessary after application of the above risk techniques;
- -The application of these techniques varies by risk type and combinations of them may be required in addressing specific risks.

#### Risk governance - Guiding principles

Responsibility for managing risks is an integral element of all roles and activities throughout Swiss Life. Key principles are:

- Ownership and accountability: roles and responsibilities and minimum control standards for risk takers and risk controllers are clearly defined and communicated;
- Compliance with regulatory requirements: external legal and regulatory requirements must be met at all times and in an efficient manner;
- Coordination and reliance among different assurance functions, e.g. ongoing exchange between Risk, Compliance and Audit;
- *Independence*: clear separation between risk taking and risk controlling/assurance functions while maintaining strong links to the business.

#### Risk governance - lines of defence

Swiss Life's organizational structure can be viewed as three «lines of defence» ensuring independent risk monitoring and control activities.

The first line of defence is the responsibility of the business (risk takers) and includes (but is not limited to):

- -Senior management;
- Process owner;
- -Control owner.

The second line of defence concerns those responsible for risk oversight and risk guidance (risk controller i.e. risk measurement / monitoring) including the corresponding reporting:

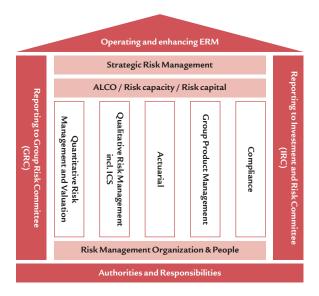
- Risk management functions;
- -Compliance;
- -Other control functions.

The third line of defence is independent assurance of the effectiveness and efficiency of risk management processes (among others). This assurance is the responsibility of:

- -Internal audit;
- External audit.

#### Risk management framework of Swiss Life Group

The risk management framework as depicted in the table below serves to operate and enhance the Group's enterprise risk management (ERM) and to achieve the stated goals. The authorities and responsibilities are defined in the Articles of Association and Regulations, in the Organisational Regulations of SL Holding and in the directives systems. They provide the foundation to operate the Group's ERM. The boards and committees as well as the organization were described previously.



#### Quantitative risk management and valuation

The emphasis in the framework for the quantitative risks is put on the insurance businesses and relies on economic principles.

If possible and meaningful, risks are measured and quantified (quantitative risk management). Otherwise a qualitative assessment for the identified risks has to take place (covered by the qualitative risk management directive).

Risks should be quantified as far as possible, based on generally accepted methods. Risk valuation models are not static and have to be continuously improved.

Different forms of financial terms may occur:

- Preferably risk is measured according to probabilities and the corresponding extent of negative drawdowns;
- -Possibly risk is measured as the impact of specific scenarios with an assigned probability that is subject to experience and judgement.

The methods to assess the individual quantitative risks are outlined in the guidelines on quantitative risk management:

- Market risk: Interest rate risk (covering also Asset and Liability Management (ALM) risk and interest rate spread risk), equity risk, currency risk, real estate and alternative investment risk;
- *Credit risk:* Migration risk (covering also default risk), concentration risk (with respect to counterparty, industry and geography);
- *Insurance risk*: Mortality, longevity, disability, recovery, surrender, costs, capital option;

-Liquidity risk (especially funding risk) is covered within the ALM process by stress scenarios. Liquidity is continuously monitored by a liquidity plan and liquidity reporting. In addition liquidity stress test are conducted on a quarterly basis.

The aggregation of market, credit and insurance risks to the economic risk capital takes the effect of extreme scenarios (financial as well as biometric and combined ones) as well as diversification effects into account.

The liabilities and the corresponding assets of the insurance business are projected based on economic scenarios over a long time horizon. In this projection, management rules, such as rules on profit sharing between policyholder and shareholder are applied. The expected shareholder value under these scenarios contributes to the risk capacity as do other forms of capital such as hybrid debt. By stressing the economic scenarios or parameters applied in the projection, sensitivities to financial market changes or to insurance parameters are derived.

The unit-linked contracts on policyholders' account are considered on a net cash flow basis and are subject to insurance, market and credit risk.

The quantification for these is done in terms of economic risk capital that reflects the potential loss in adverse situations over a one-year period, based on the risk drivers identified for each business. This capital needed has to be covered by risk bearing capital, and the ratio corresponds to the coverage or the economic solvency.

#### Qualitative risk management

The qualitative risk management covers strategic risks, emerging risks and operational risks. In these areas, the risks are difficult to quantify or a general quantification approach is not established yet in the insurance sector. Where appropriate, the identified risks are addressed by the ICS.

#### Strategic Risk

Swiss Life uses analytical methods to ensure that strategic risks are dealt with adequately in what continues to be a very challenging economic environment. In its strategic risk management process, Swiss Life incorporates all the information on risks and the risk/return characteristics in its strategic decisions. A thorough understanding of the interplay of individual risks is essential to take into account the factors influencing risks during strategy development so that these factors can be steered appropriately.

#### **Emerging Risk**

With emerging risk management, newly developing or changing risks and their influence on the existing risk environment are monitored and analysed. Emerging risk is a dedicated risk category, which has strong interaction with other risk types such as insurance risk such as mortality, longevity and disability. Often, consequences of emerging risks are influencing triggers of other risk types in both ways, positive or negative. From a risk management perspective, those consequences, which have an impact on the business have to be analysed, understood and monitored over time. The result of the analysis is considered in the strategic risk management process.

#### Operational Risk

Operational risk is an inevitable consequence of being in business. The aim is not to eliminate every source of operational risk but to provide a framework that supports the identification and assessment of all material operational risks and potential concentrations in order to achieve an appropriate balance between risk and return. Sound operational risk management (which includes information security and IT risk management as well as business continuity management) and an effective ICS are an integral part of creating sustainable value for shareholders.

The Swiss Life's ICS framework is described in chapter B.4.

#### Risk steering and Swiss Life's comprehensive system of limits

Swiss Life has set up a comprehensive system of limits to capture and reflect the nature of the underlying risks.

#### Quantitative Risk

- -The risk appetite is set on BoD level by the IRC and is expressed as Swiss Solvency Test (SST) ratio limit for Swiss Life Group and for Swiss Life AG;
- -This risk appetite is cascaded down through unit specific SST ratio limits (which ensure in aggregate adherence to the SST ratio limit for Swiss Life AG) set by the GRC and specific risk capital and exposure limits for units set by the Asset Liability Committee (ALCO);
- For credit risk, rating-dependent exposure limits avoid concentration risk of counterparties;
- -Monitoring is performed through two key reports on both unit and consolidated level. As part of ALCO process, additional local constraints (e.g. SII, tied asset coverage, etc.) are monitored and managed locally;
- -Within the asset managers division, additional limits (including monitoring) are established to operationalize ALCO limits and to therefore ensure adherence to the ALCO and ultimately SST limits.

#### Qualitative Risk

-Strategic and operational risks have quantitative risk tolerance levels and thresholds.

#### Actuarial

-Insurance risk is managed through an underwriting case process with limits and thresholds.

#### Product Management

- Profitability hurdle rates on unit and product level trough pricing policy;
- Local product developments exceeding certain thresholds are subject to a Group approval process.

#### Risk Management Function of SLLIE

The Risk Management Function is not isolated but an integral part of the overall management activities of SLLIE as it is within Swiss Life Group.

It should not only analyse the developments of the past but should also provide the senior management with the analysis of future risk aspects.

SLLIE's Risk Management Function is headed by the local Head Finance & Risk.

The responsibilities of the local Head Finance & Risk in the context of quantitative risk management are:

- -ensuring the establishment of an appropriate risk management in the relevant unit;
- processing and solving risk management issues within the relevant unit;
- -representing the relevant unit in risk management issues within and outside the company in consultation with Group Risk;
- reporting according to the instructions of the Group Risk which are outlined in the guideline on risk reporting;
- implementing the respective requirements of the Group directives and guidelines into their directives system by taking into consideration local law, local specifications and business activities;
- ensuring that the necessary human resources are available in terms of numbers, skills, knowledge, and experience.

The final functional management is in the responsibility of the Group Chief Risk Officer ("CRO"). The risk functions are established at Group and SL Business Division/ Business Area level with the respective responsibilities. The Group and local risk functions support the risk management bodies (GRC and IRC) and ensure the adherence to and the compliance with the respective Group and local directives.

#### Own Risk and Solvency Assessment (ORSA)

Pursuant to Art. 45 of the Solvency II Directive, SLLIE performs the Own Risk and Solvency Assessment (ORSA) which is embedded Company's decision-making and risk management process.

The ORSA consists of a forward-looking assessment of the Company's risk and solvency position over the planning period, comprising:

- -An assessment of the continuous compliance with the SCR and Technical Provisions;
- -An assessment of the significance of the deviations between the Company's own risk profile and the assumptions underlying the Solvency II Standard Formula;
- -An assessment of the Overall Solvency Needs (OSN) taking into account the Company's risk profile and risk tolerance limits.

The quantitative assessment of the OSN is performed by taking the results of scenario- and stress-tests into account and is supplemented by a qualitative description of the Company's risk profile. The OSN assessment covers all material risks the Company is exposed to and is performed considering a number of scenarios. Those are defined by the AMSB consistently with the Company's risk profile taking into account a range of developments relevant for the business such as changes in the economic environment, the resulting evolvement of the risk profile and projected management decisions in accordance with the business strategy.

The ORSA is an integral part of the risk management of SLLIE and is embedded in the decision-making process of the Company. The results of the ORSA are an input to the strategic mid-term planning (MTP) process, which sets strategic direction of the Company over a three year horizon.

The ORSA is performed at least on an annual basis in accordance with the schedule of the MTP process. In addition, a non-regular ORSA might be required in case of specific internal or external events (e.g. the start-up of a new line of business, portfolio transfers or major changes in the asset structure or financial market conditions). The results of the ORSA are included in the ORSA report.

In 2019, the Company produced its sixth official ORSA report duly approved by the BoD.

#### **B.4** Internal control system

Swiss Life Group's ICS consists of the entirety of procedures, methods and measures prescribed by the BoD and the Corporate ExB to ensure the orderly conduct of business. The focus is on the reliability of financial reporting, the effectiveness of business processes and compliance with laws and regulations issued to protect the company's assets.

Swiss Life Group established an effective ICS as part of the overall qualitative risk management to mitigate financial reporting risks, compliance risks and operational risks. Swiss Life's ICS essentially comprises the following parts as outlined in the ICS Group Guideline: the ICS framework, the internal control management process and the associated roles and responsibilities.

The ICS framework contains the description and documentation of:

- process-level control measures (measures implemented in business process to mitigate financial reporting, operations and compliance risk);
- entity-level control measures (measures implemented to control compliance with external and internal laws, regulations and standards);
- the IT control framework (framework to ensure completeness, accuracy and integrity of business transactions which are performed or supported by applications) and
- -minimum requirements for end-user computing tools.

SLLIE implemented and operates the ICS locally within the standards of SL Group. The ICS comprises the ICS framework, the internal control management process and the associated roles and responsibilities.

#### Description of the Compliance Function

The objective of the Compliance Function in SLLIE is to ensure:

- -a conduct that ensures compliance with legal and regulatory requirements and other external or internal regulations at all times;
- the identification and avoidance of compliance risks, and thus of respective consequences, above all potential impacts on Swiss Life's reputation;
- a prudent management at all times

by defining the necessary compliance standards and respective processes for all areas of Swiss Life Group, supporting both employees and management in the implementation and enforcement thereof. Moreover, the role of local compliance is prescribed to encompass the local regulatory requirements of Solvency II.

Group compliance standards have been developed to ensure the implementation and enforcement of material compliance topics, in accordance with the locally applicable legal and regulatory requirements<sup>3</sup>. The compliance function ensures at every functional level adherence to the Group directives system described in chapter B.1.

<sup>&</sup>lt;sup>3</sup> SLG 8.2 Compliance Standards

SLLIE defines the reporting line between the local Head of Compliance and the local Management while taking into consideration the independence of the function as second line of defense. In addition, the local Head of Compliance has a functional reporting line to the Group Head of Compliance.

SLLIE's Compliance Function is owned by the local Head of Compliance. This function is geared toward 5 different pillars for which the department is responsible for performance and reporting to the local CEO and the divisional Head of Compliance:

- -Compliance with the regulation against money laundering and the terrorism financing;
- -Qualitative Risk management (including the management of the ICS);
- Compliance Audits & Controls;
- Regulatory Compliance including tax reporting activities (FATCA/CRS);
- -Special Investments in the context of the Private Wealth business (private equity investments).

#### **B.5** Internal audit function

The Internal Audit Function is performed by the Corporate Internal Audit of the Swiss Life Group in conjunction with the Audit Committee of the Group. By doing so, the Company ensures that:

- -Appropriate resources are allocated to the task;
- Recognised internal audit standards are applied and fulfill the requirements of the law such as audit plan definition, adequate reporting of audit findings and recommendations;
- A follow-up process is in place through effective tracking tools;
- -Decisions of the BoD of the Company comply with previous recommendations.

#### **B.6** Actuarial function

The local Head of Actuarial Services ensures at all time that the actuarial function is carried out by persons who have an adequate knowledge and understanding of the written insurance business, stochastic nature of insurance, the risk inherent in assets and liabilities, as well as an understanding of the use of statistical models commensurate with the sophistication of the methodologies and models applied by Swiss Life Group. The deepness of the knowledge required depends on the organisational level they belong to.

The Actuarial Function at Swiss Life is defined in the following organisational levels:

- Group Actuarial Services;
- -Appointed Actuary;
- -Actuarial Board;
- -Actuarial Organisation and local Actuarial Services.

The local Head Actuarial Services represents the Actuarial Function.

#### **Actuarial Board**

The Actuarial Board consists of the Group Chief Actuary (Chairman), the local Chief Actuaries and the Appointed Actuaries. The Board approves Actuarial Directives, Guidelines and Instructions from a functional point of view according to the Group Directive system.

#### **Local Chief Actuary**

The local Chief Actuary is responsible for performing all actuarial functions of the Business Division without any statutory duties in contrast to the Appointed Actuary. The local Chief Actuaries and Appointed Actuaries are members to the Swiss Life Actuarial Board.

The local Chief Actuary has to ensure the appropriateness of the Divisional Actuarial Function Guidelines and the alignment with all local specific legal and regulatory requirements. As an Actuarial Function the local Chief Actuary is responsible for assessment of the technical provisions according to Solvency II principle, the assessment of reinsurance and underwriting policy regarding their appropriateness. An adequate segregation of responsibilities established within the organizational structure ensures that the person performing actuarial tasks are not simultaneously responsible for the execution and for the providing an option on the adequacy of the execute item.

#### **B.7 Outsourcing**

A Group Outsourcing Guideline defines outsourcing requirements throughout the Swiss Life Group. It regulates the outsourcing to an external service providers and describes the outsourcing process at Swiss Life and has been implemented accordingly by SLLIE.

Prior to the outsourcing of critical or important functions or activities as well as of any subsequent material developments with respect to those functions or activities, the outsourcing SL entity has to notify Group Qualitative Risk Management.

In case of outsourcing of a critical or important functions such as risk management, compliance, internal audit or actuarial, the Company has to ensure the fitness and propriety of all persons working on that function. The outsourcing has to be approved by the Group Executive Committee or the Divisional Executive Committee.

The Company maintains an inventory about all outsourcings (internal and external) which contains information about the classification ("critical and / or important activity or function"), the performance evaluation and the impact on Swiss Life, in case the service is not delivered as agreed (risk assessment).

The Company has two critical outsourcings (IT infrastructure management and outsourcing of HR payroll administration) which both have the appropriate formal agreements and are monitored closely.

# C Risk Profile

Risk is defined as the potential danger of an actual result deviating adversely from the expected result. If meaningful, material risks must be measured and quantified. If a risk cannot be quantified, a qualitative assessment needs to be done.

When measured, the risks are assessed by their contribution to the SCR applying the standard formula from the Directive 2009/138/EC. In other cases, when this is not possible, the risks are identified, assessed and managed through the Company's qualitative risk management framework including the internal control system.

The detailed results from the Solvency II standard formula are given in section E.2. As a summary, the main risks for the Company are the market risk, more specifically currency and equity risk, the life underwriting risk due to lapse risk as well as credit risk.

The Company invests its assets according to the 'prudent person principle' as presented in Article 132 of Directive 2009/138/EC:

The general assets (i.e. not covering unit-linked contracts) are invested in regulated financial markets and no use of derivatives was made over 2019.

The unit-linked investments follow the investment strategy provided in the contract conditions chosen by the policyholder. Moreover, the valuation processes in place aim at limiting any discrepancy in value between the technical provisions and the covering assets.

#### C.1 Underwriting risk

Insurance risk refers to the risk of a loss based on deviation between the expected costs for claims and benefits and the actual costs as a result of accident, error or change of circumstances.

Insurance contracts are contracts under which one party (the insurer) agrees to compensate the other party (the policyholder) if a specified uncertain future event affects the policyholder. The Group's insurance entities neither generally accept nor generally deny insurance coverage to applicants, but ensure that all the insurance risks are identified and thoroughly assessed, and that the insurance premiums accurately reflect the risk taken. The amount and type of risk taken must be in line with the Group's risk policy and strategy, and must also meet the profitability targets.

#### **Embedded options**

The ability of a policyholder to pay reduced or no future premiums under a contract, to terminate the contract completely or to exercise a guaranteed annuity option means that the insurer's liability is also subject to policyholder behaviour to a certain extent. On the assumption that a certain group of policyholders will make decisions rationally, overall insurance risk can be aggravated by such behaviour.

#### **Underwriting strategy**

Underwriting is the process of selecting and classifying insurable risks. The underwriting strategy attempts to ensure that the risks underwritten are profitable and well diversified in terms of type of risk and level of insured benefits. Life insurance underwriting is performed to ensure that the

premiums and the general conditions of the insurance policies are adequate for the risks to be insured.

#### Measures to assess the material risks

Insurance Risk is regularly measured based on the Solvency II Standard Formula and its assessment is part of the ORSA process of the Company.

#### Material risk exposure (incl. material changes)

Due to the nature of its portfolio and unit-linked products, SLLIE is exposed to underwriting risk mainly by lapse risk linked to the policyholder behaviour.

Expense risk exists in all insurance companies and arises when the loadings are not sufficient to cover the administration expense basis. Expense risk is the second largest underwriting risk.

Biometric risks such as mortality have a limited risk contribution due to the reinsurance program in place and the nature of the products with only legally required death coverage.

#### C.2 Market risk

Market risk refers to the risk of a loss due to changes in the financial position, which, directly or indirectly, arise from fluctuations in the level and/or volatility of market prices for assets, liabilities or financial instruments. Market risk includes the risk of currency rate changes.

In the context of SLLIE, market risk is mainly due to a potential decrease in future profits due to adverse market developments. This is a consequence of the fact that market risks are borne by policyholders for the majority of the Company's portfolio.

#### Measures to assess the material risks

Market Risk is regularly measured based on the Solvency II Standard Formula and its assessment is part of the ORSA process of the Company.

#### Material risk exposure (incl. material changes)

SLLIE's Market Risk is mainly driven by currency risk resulting from the fact that the currencies of the insurance contracts are mostly different from the reporting currency CHF.

Furthermore, Market Risk is explained by equity and spread risk which are the second largest ones due to the unit-linked portfolios invested in equity, bonds, equity and fixed income funds.

Interest rate risk is not material as the durations of the liabilities and their covering assets are matched.

#### C.3 Credit risk

SLLIE is exposed to Credit Risk, which is the risk due to the uncertainty in a counterparty's ability to meet its contractual obligations. Key areas are:

- Reinsurance share of insurance liabilities;
- -Amounts due from reinsurers in respect of claims already paid.

#### Measures to assess the material risks

Credit risk is regularly measured based on the Solvency II Standard Formula and its assessment is part of the ORSA process of the Company.

#### Material risk exposure (incl. material changes)

As of year-end 2019, credit risk arises on the reinsurance treaties in force.

#### C.4 Liquidity risk

Liquidity Risk means the risk that SLLIE is unable to realise investments and other assets in order to settle their financial obligations when they fall due.

#### Measures to assess the material risks

Liquidity Risk is assessed as not material due to the business model of the Company. In terms of unit-linked policies, a certain minimum level of cash is always available in the policy accounts to earn the admin fees and mortality risk premiums, allowing to face liquidity risk.

#### Material risk exposure (incl. material changes)

As of year-end 2019, the Company is not subject to material liquidity risk exposures.

#### C.5 Operational risk

Operational Risk is the risk of losses resulting from inadequate or failed internal processes, people and systems, or from external events. This definition includes Outsourcing and Legal Risks but excludes risks arising from strategic decisions and reputational risks.

#### Measures to assess the material risks

Operational risk is regularly measured based on the Solvency II Standard Formula and its assessment is part of the ORSA process of the Company.

### Material risk exposure (incl. material changes)

As of year-end 2019, the Company is exposed to material operational risk related to the business, which can therefore not be avoided. These include negative developments in the political / tax environment and loss of key skills or employees.

#### C.6 Other material risks

Besides the risks discussed above, the Company is exposed to the risks which arise as a consequence of the cross-border nature of the business. These are related to external regulatory or market factors (e.g. change in political or tax environment) that would unfavourably change the SLLIE's ability to maintain or develop its activities in the areas where the business is currently conducted.

#### C.7 Any other information

#### Risk concentration

The company has no material exposure to concentration risk as of year-end 2019.

#### Risk mitigation

Reinsurance

Reinsurance is used to limit the exposure to insurance risk. This does not, however, discharge the liability as a primary insurer, and, if a reinsurer fails to pay a claim, the Company remains liable for the payments to the policyholder. A loss allowance would be recognised for any estimated unrecoverable reinsurance.

SLLIE's management reviews reinsurance programs covering treaty, type, risks covered and retention on a regular basis. A process, competencies and limits are set up for the approval of reinsurance programs and their modification. To ensure that the Group's principles are observed, guidelines on reinsurance are in place.

In accordance with its retention policy for mortality, the Company limits its exposure to CHF 5 million per life.

#### Other risk transfer

Risk transfer primarily takes the form of reinsurance. Alternative forms of risk transfer (such as securitisation) require the formal approval of the GRC. No significant alternative form of risk transfer is used by the Company at present.

Insurance risks are regularly reported to the GRC.

#### Risk sensitivities

The assessment of risk sensitivities is a key element of the Company's ORSA, where a number of stress-, scenario and reverse stress tests are performed. These are performed based on assumptions related to the development of assets and a liabilities, taking the risk profile of SLLIE into account. The outcome of this analysis is used as a basis to identify the key risks the Company is exposed to and is integrated in the MTP process through the ORSA.

# D Valuation for Solvency Purposes

#### **D.1** Assets

According to Article 75(1)(a) of Directive 2009/138/EC all assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction, that means with their fair values.

The overview of the Company's assets reported in the Solvency II balance sheet as of year-end 2019 is shown below (with year-end 2018 as comparison period). For more detailed information on the asset breakdown, we refer to template S.02.01.02 in the annex.

In	CH	- mıl	lior

ASSETS	2019	2018
Investments (other than assets held for index-linked and unit-linked contracts)	41.6	41.0
Assets held for index-linked and unit-linked contracts	4 445.9	4 250.4
Reinsurance recoverables	1 076.0	1 133.8
Cash and cash equivalents	21.7	18.0
Other assets	6.0	5.6
Total Assets	5 625.8	5 477.4

A hierarchy of valuation methodologies is prescribed by Solvency II in Art. 10 of Commission Delegated Regulation EU 2015/35 for the valuation of assets. As a default valuation method, quoted market prices in active markets shall be used. If this is not possible, alternative approaches shall be used. The bases, methods and main assumptions used for the valuation of assets for solvency purposes are given below for the material asset classes, together with an explanation of material differences compared to the statutory valuation.

#### Investments (other than assets held for index-linked and unit-linked contracts)

SLLIE investments mainly consist of bonds and deposits. Both assets classes are valued according to their market value as reported for IFRS purposes. Differences compared to statutory financial statements arise due to bonds being valued at amortized cost for statutory reporting purposes.

#### Assets held for index-linked and unit-linked contracts

Assets held for index-linked and unit-linked contracts are valued as the market value of the underlying investments as reported for IFRS and statutory reporting purposes.

#### Reinsurance recoverables

The value of the reinsurance recoverables corresponds to the amount of gross Solvency II best-estimate technical provisions which is reinsured according to the underlying reinsurance treaties (D.2).

#### Cash and cash-equivalents, other assets

Cash and cash equivalents and other assets are valued according to their nominal value. Differences compared to statutory financial statements arise from intangible assets being valued to zero pursuant to Art. 12 of Commission Delegated Regulation EU 2015/35.

#### Reconciliation of assets

The reconciliation of assets recognized for statutory and Solvency II purposes is shown in the table below.

In CHF million		
	2019	2018
Statutory assets	5 655.8	5 511.3
Intangible assets valuation	-2.1	-4.4
Bond valuation	0.6	0.4
Valuation of reinsurance recoverables	-28.5	-29.9
Solvency II assets	5 625.8	5 477.4

#### **D.2 Technical Provisions**

The overview of the Company's technical provisions reported in the Solvency II balance sheet is shown below. For more detailed information on the breakdown, we refer to template S.12.01.02 in the annex.

In CHF million	Insurance with profit participation		l unit-	ndex-linked and linked insurance	Othe	r life insurance
	2019	2018	2019	2018	2019	2018
Best estimate	25.1	21.0	5 363.9	5 257.5	2.5	2.6
Risk margin	0.1	0.1	20.3	21.7	0.0	0.0
Technical provisions	25.2	21.1	5 384.2	5 279.2	2.5	2.6

#### Solvency II valuation

The valuation of technical provision is set out in the Delegated Acts, Art. 17 to 61. Technical provisions either constitute of the best estimate and the risk margin or are calculated as a whole. Both methods are described in detail below. The same approach is used for the valuation of reinsurance recoverables.

According to Delegated Acts, Art. 55, technical provisions have to be calculated separately for the relevant LoB. The calculation of technical provisions shall make use of and be consistent with information provided by the financial markets and generally available data on underwriting risks (market consistency).

The best estimate corresponds to the probability-weighted average of future cash-flows, taking account of the time value of money (expected present value of future cash-flows), using the relevant risk-free interest rate term structure. The calculation of the best estimate is based upon up-to-date and reliable information and realistic assumptions and performed using adequate, applicable and relevant actuarial and statistical methods. The best-estimate is calculated gross of reinsurance recoverables.

The calculation of the best estimate is performed using a cash-flow valuation model in order to project future cash-flows related to premium, claims, expenses related to the Company's insur-

ance obligations. Those cash-flows are derived based on assumptions about future mortality, policyholder behaviour, expenses and future evolution of the financial markets. The cash-flows are discounted using the relevant risk-free interest rates provided by EIOPA.

The risk margin is such as to ensure that the value of the technical provisions is equivalent to the amount that insurance undertakings would be expected to require in order to take over and meet the insurance obligations. It reflects the cost of holding regulatory capital. Pursuant to the Solvency II Directive, the calculation of the risk margin is based on a projection of future the future Solvency Capital Requirements under the assumption that the insurance portfolio of SLLIE is transferred to another insurance company.

#### Transitional and long-term guarantee measures

SLLIE does not use the Volatility Adjustment referred to in Art. 77b of Directive 2009/138/EC nor the transitional measures referred to in Art. 308c and Art. 308d of the same Directive.

#### Reconciliation of Technical Provisions

The difference between the Solvency II and statutory value of life technical provisions (excluding unit-linked business) is given as follows.

In CHF million		Solvency II		Statutory
	2019	2018	2019	2018
Best estimate	27.5	23.6	27.5	23.6
Risk margin	0.1	0.1	0.0	0.0
Total	27.7	23.7	27.5	23.6

The only difference between the statutory and Solvency II value of technical provisions for non-unit linked business is therefore given by the Risk Margin (which does not exist in the statutory framework). The Best Estimate of technical provisions is assumed to be equal to the statutory value thereof (i.e. no revaluation takes place) as this business is considered to be immaterial compared to the remaining part of the Company's portfolio as of year-end 2019. This simplification has been chosen by the Company pursuant to Art. 56 of Commission Delegated Regulation EU 2015/35.

The difference between the Solvency II and statutory value of life technical provisions for unitlinked business is shown below.

In CHF million		Solvency II		Statutory	
	2019	2018	2019	2018	
Best estimate	5 363.9	5 257.5	5 462.9	5 363.7	
Risk margin	20.3	21.7	0.0	0.0	
Total	5 384.2	5 279.2	5 462.9	5 363.7	

Besides differences arising from the Risk Margin (see above), material differences between the Solvency II best estimate and the statutory value of liabilities are due to present value of future

profits (PVFP) being recognized in the Solvency II balance sheet. These are calculated with the same approach used for the PVFP valuation for the Market Consistent Embedded Value as well as the SST.

### Level of uncertainty in the amount of the technical provisions

Random annual fluctuations of the insurance benefits, the lapse behaviour of policyholders and the profit participation rules could lead to portfolio variation. Pandemic events can have also significant one-off effects on the insurance benefits. Furthermore, changes in policyholder biometrics or lapse risks lead to high level of uncertainty of technical provisions. Thus, the actuarial assumptions have to be reviewed annually.

#### Recoverables from reinsurance contracts

The reinsurance recoverables are related to reinsurance contracts which are in place and cover the guarantees on a portion of the unit-linked portfolio of the Company.

The requirements regarding the treatment of recoverables are outlined in Delegated Acts, Art. 41 and 42. In particular, the calculation must be consistent with the principles and methodologies used for the valuation of the underlying technical provisions. The value of reinsurance recoverables is equal to the portion of gross technical provisions which is ceded by SLLIE to the reinsurer. As a result, the valuation is based on the same methods, models and assumptions used for the valuation of the Company's technical provisions.

#### D.3 Other Liabilities

The overview of the Company's other liabilities reported in the Solvency II balance sheet is as follows.

In CHF million		
	2019	2018
Provisions other than technical provisions	3.7	4.3
Pension benefit obligations	1.5	1.2
Deferred tax liabilities	6.5	6.2
Insurance and intermediary payables	74.1	35.0
Payables (trade, not insurance)	22.1	22.4
Subordinated liabilities	0.0	5.0
Any other liability, not elsewhere shown	3.2	1.3
Total other liabilities	111.3	75.3

The valuation of other liabilities for solvency purposes is discussed below together with the main differences compared to the statutory valuation.

#### Provisions other than technical provisions

Provisions other than technical provisions are related to ongoing and/or expected litigation cases. They correspond to the undiscounted settlement value according to IFRS.

#### Pension benefit obligation

The pension benefit obligation is recognized at its IAS19 value under IFRS as prescribed by Solvency II. This liability is not recognized in the statutory balance sheet.

#### Deferred tax liabilities

Pursuant to Art. 15 of the Delegated Acts, deferred tax liabilities (DTLs) are recognized in relation to all assets and liabilities recognized for solvency or tax purposes. The value of DTLs is determined based on the valuation differences between the market consistent values according to Solvency II and values used for tax purposes assuming a tax rate of 12.5%.

#### Insurance and intermediary payables

Insurance & intermediaries payables mainly consist of pending benefits of insurance contracts and are valued with their surrender value as for statutory purposes.

#### **Payables**

Payables are measured with the settlement value which corresponds to the values according to IFRS and statutory accounting. They mainly consist of short-term liabilities against associate companies and other creditors.

#### Subordinated liabilities

Subordinated liabilities are measured with the settlement value which corresponds to the Statutory and IFRS value.

#### Any other liabilities

Any other liabilities are measured with the settlement value which corresponds to the values according to IFRS and statutory accounting. They mainly consist of accruals for liabilities.

### Reconciliation of other liabilities

As discussed above, the only differences between other liabilities recognized for solvency and statutory purposes arise from the recognition of pension benefit obligations and DTLs in the Solvency II balance sheet.

In CHF million		
Otherliabilities	2019	2018
Statutory value	103.2	68.0
Pension benefit obligation	1.5	1.2
Deferred tax liabilities	6.5	6.2
Solvency II value	111.3	75.3

#### D.4 Alternative methods for valuation

SLLIE applies no alternative methods for valuation as of year-end 2019.

# E Capital Management

#### E.1 Own Funds

Capital management is included in the yearly planning ORSA process. For the planning process, at least three scenarios are defined at group level that are analysed in terms of capital management. Over a time horizon of three years, the different scenarios are analysed in depth to foresee future capital management actions.

The quantitative information contained in this section refers to template S.23.01.01 shown in the annex. The Own Funds are classified in Tiers pursuant to Solvency II regulations to reflect their quality, with Tier 1 being of highest quality and made up of items which fully absorb losses to enable the Company to continue as a going concern. Own Fund items which do not satisfy the conditions to be classified as Tier 1 but are still available to absorb losses can be classified as Tier 2 and Tier 3 items provided that they satisfy the relevant conditions set by Solvency II. As of year-end 2019, all Basic Own Fund Items of SLLIE are classified as Tier 1. The subordinated loan classified as Tier 2 for year-end-2018 purposes has been paid back to Swiss Life International Holding AG in December 2019.

The composition and quality of the Basic Own Funds of SLLIE are shown in the next table.

In CHF million	Tier 1 – unrestricted		Tier 1 – restricted		Tier 2		Tier 3		Total	
Basic Own Funds	2019	2018	2019	2018	2019	2018	2019	2018	2019	2018
Ordinary share capital	5.0	5.0	-	-	-	-	-	-	5.0	5.0
Initial funds	3.0	3.0							3.0	3.0
Share premium account	45.6	42.6	-	-	-	-	-	-	45.6	42.6
Reconciliation reserve	44.1	48.6	-	-	-	-	-	-	44.1	48.6
Subordinated liabilities	-	-	-	-	0.0	5.0	-	-	0.0	5.0
Total Basic Own Funds	97.7	99.2	-	-	5.0	5.0	0.0	0.0	97.7	104.2

The decrease of the reconciliation reserve compared to year-end 2018 is mainly explained by the foreseeable dividends of CHF 5m which will be paid out to Swiss Life International Holding AG in 2020 for the year 2019.

As of year-end 2019 in line with previous year, the total Basic Own Funds are eligible to cover the Solvency Capital Requirement (SCR) of SLLIE, as shown in the following table.

In CHF million	Tier 1 – unrestricted		Tier 1 – restricted			Tier 2	Tier3		Total	
	2019	2018	2019	2018	2019	2018	2019	2018	2019	2018
Total Eligible Own Funds to meet the SCR	97.7	99.2	-	-	0.0	5.0	-	-	97.7	104.2

The amount and composition of the eligible Own Funds to cover the Minimum Capital Requirement (MCR) are shown below.

In CHF million	Tier 1 – u	unrestricted	Tier 1	- restricted		Tier 2		Tier3		Total
	2019	2018	2019	2018	2019	2018	2019	2018	2019	2018
Total Eligible Own Funds to meet the MCR	97.7	99.2	-	-	0.0	4.0	-	-	97.7	103.3

As mentioned above, there is no subordinated loan to be accounted for. For year-end-2018 only 4.0 mCHF of the subordinated loan were eligible to cover the MCR due to the quantitative limits set by Art. 82 of the Delegated Acts on Tier 2 items, whose eligible amount is capped at 20% of the MCR.

Material differences between equity shown in the financial statements and the excess of assets over liabilities as calculated for Solvency II purposes arise from different rules and regulations for valuation and consideration of balance sheet items (see chapter D). The reconciliation between statutory equity and the excess of assets over liabilities in the Solvency II balance sheet is as follows.

In CHF million		
	2019	2018
Statutory Equity	62.2	56.1
Valuation of Technical Provisions and reinsurance recoverables	50.0	54.5
Intangible assets	-2.1	-4.4
Deferred tax liabilities	-6.5	-6.2
Other adjustments	-5.9	-0.8
Excess of assets over liabilities for solvency purposes	97.7	99.2

#### E.2 Solvency Capital Requirement and Minimum Capital Requirement

The SCR is calculated based on the Solvency II Standard Formula. The next table shows the amount of SCR; the decrease compared to previous year is related to counterparty risk. Based on the products' General terms and Conditions flowing into a legal assessment, the risk of default of custodian banks for the cash held within unit linked policies is borne by the policyholder. Thus, compared to previous year, counterparty default risk arises solely from ceded insurance portfolios.

In CHF million		
	2019	2018
Basic SCR	38.3	48.8
Adjustment for the loss absorbing capacity of technical provisions	-	-
Adjustment for the loss absorbing capacity of deferred taxes	-5.1	-6.4
Operational risk	2.6	2.4
SCR	35.8	44.9

The amount of SCR by risk module is shown below.

In CHF million		
	2019	2018
SCR for market risk	11.9	11.5
SCR for counterparty default risk	7.8	22.9
SCR for life underwriting risk	30.3	32.2
Basic SCR	38.3	48.8

The highest risk component is given by insurance risk; this reflects the loss in future income which would be faced by SLLIE in case of a significant lapse event in the underlying portfolio. The decrease in counterparty default risk is described above.

The MCR is calculated based on the standard model. In the end, the cap from the SCR is defining the required level of MCR (45% of the SCR).

In CHF million		
	2019	2018
Linear MCR	30.6	29.3
Floor	8.9	11.2
Сар	16.1	20.2
Combined MCR	16.1	20.2
Minimum guarantee fund	4.0	4.2
MCR	16.1	20.2

SLLIE applies neither simplified calculations for the Standard Formula SCR nor uses undertaking specific parameters as of year-end 2019.

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

SLLIE does not use the duration based equity risk sub-module.

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

The figures shown in the previous chapters show that SLLIE is compliant with the regulatory requirements in terms of compliance with the MCR and SCR.

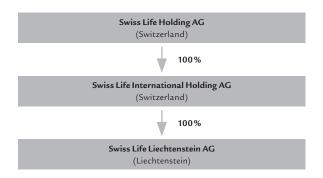
#### E.5 Impact of Corona Virus on Solvency Ratio

Since Swiss Life (Liechtenstein) AG does not hold any equities within the own assets, the impact of stock market decline on the Solvency ll ratio is very limited. Being unit-linked the main business component, there is a proportional effect in terms of capital available and required.

Lower present value of future profits after stock market decline imply lower capital available as well as a reduced risk exposure; in particular, a decrease in market and insurance risk. The impact on the Solvency ll ratio is not material.

# Annex

### Holding structure



### S.02.01.02 Balance sheet

CHF		Solvency II value
		C0010
ASSETS AS OF 31 DECEMBER 2019		
Intangible assets	R0030	0
Deferred tax assets	R0040	0
Pension benefit surplus	R0050	0
Property, plant & equipment held for own use	R0060	0
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	41 587 870
Property (other than for own use)	R0080	0
Holdings in related undertakings, including participations	R0090	100 000
Equities	R0100	0
Equities - listed	R0110	0
Equities - unlisted	R0120	0
Bonds	R0130	37 689 670
Government Bonds	R0140	6 046 095
Corporate Bonds	R0150	31 643 576
Structured notes	R0160	0
Collateralised securities	R0170	0
Collective Investments Undertakings	R0180	0
Derivatives	R0190	0
Deposits other than cash equivalents	R0200	3 798 200
Other investments	R0210	0
Assets held for index-linked and unit-linked contracts	R0220	4 445 923 140
Loans and mortgages	R0230	8 260
Loans on policies	R0240	8 260
Loans and mortgages to individuals	R0250	0
Other loans and mortgages	R0260	0
Reinsurance recoverables from:	R0270	1 076 045 518
Non-life and health similar to non-life	R0280	0
Non-life excluding health	R0290	0
Health similar to non-life	R0300	0
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	19 178 854
Health similar to life	R0320	0
Life excluding health and index-linked and unit-linked	R0330	19 178 854
Life index-linked and unit-linked	R0340	1 056 866 663
Deposits to cedants	R0350	0
Insurance and intermediaries receivables	R0360	4 625 501
Reinsurance receivables	R0370	0
Receivables (trade, not insurance)	R0380	29 929 989
Own shares (held directly)	R0390	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	0
Cash and cash equivalents	R0410	21 709 441
Any other assets, not elsewhere shown	R0420	5 963 598
TOTALASSETS	R0500	5 625 793 317

### S.02.01.02 Balance sheet (continued)

CHF		Solvency II value
		C0010
LIABILITIES AS OF 31 DECEMBER 2019		
Technical provisions - non-life	R0510	0
Technical provisions - non-life (excluding health)	R0520	0
TP calculated as a whole	R0530	0
Best Estimate	R0540	0
Risk margin	R0550	0
Technical provisions - health (similar to non-life)	R0560	0
TP calculated as a whole	R0570	0
Best Estimate	R0580	0
Risk margin	R0590	0
Technical provisions - life (excluding index-linked and unit-linked)	R0600	27 652 330
Technical provisions - health (similar to life)	R0610	0
TP calculated as a whole	R0620	0
Best Estimate	R0630	0
Risk margin	R0640	0
Technical provisions - life (excluding health and index-linked and unit-linked)	R0650	27 652 330
TP calculated as a whole	R0660	0
Best Estimate	R0670	27 548 164
Risk margin	R0680	104 166
Technical provisions - index-linked and unit-linked	R0690	5 384 169 505
TP calculated as a whole	R0700	0
Best Estimate	R0710	5 363 887 358
Risk margin	R0720	20 282 147
Contingent liabilities	R0740	0
Provisions other than technical provisions	R0750	3 723 351
Pension benefit obligations	R0760	1 510 712
Deposits from reinsurers	R0770	0
Deferred tax liabilities	R0780	6 507 880
Derivatives	R0790	0
Debts owed to credit institutions	R0800	0
Financial liabilities other than debts owed to credit institutions	R0810	0
Insurance & intermediaries payables	R0820	74 146 625
Reinsurance payables	R0830	0
Payables (trade, not insurance)	R0840	22 142 602
Subordinated liabilities	R0850	0
Subordinated liabilities not in BOF	R0860	0
Subordinated liabilities in BOF	R0870	0
Any other liabilities, not elsewhere shown	R0880	3 225 277
TOTAL LIABILITIES	R0900	5 523 078 284
Excess of assets over liabilities	R1000	102 715 033

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

as of 31 December 2019					Line of Busines	s for: life insura	nce obligations	Life reinsuran	ce obligations	
		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	Total
CHF		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
PREMIUMS WRITTEN										
Gross	R1410		2 489 176	373 793 065						376 282 241
Reinsurers' share	R1420		1 659 305	685 222						2 344 528
Net	R1500		829 871	373 107 842						373 937 713
PREMIUMS EARNED										
Gross	R1510		2 489 176	373 793 065						376 282 241
Reinsurers' share	R1520		1 659 305	685 222						2 344 528
Net	R1600		829 871	373 107 842						373 937 713
CLAIMS INCURRED										
Gross	R1610		936 004	524 732 221						525 668 225
Reinsurers' share	R1620		808 581	77 612 650						78 421 231
Net	R1700		127 424	447 119 571						447 246 994
CHANGES IN OTHER TECHNICA	L PROVISIONS									
Gross	R1710		-2 081 941	-72 022 114						-74 104 055
Reinsurers' share	R1720		-2 077 378	60 618 841						58 541 463
Net	R1800		-4 562	-132 640 955						-132 645 518
Expenses incurred	R1900		2 102 061	15 737 072						17 839 134
Other expenses	R2500									844 277
TOTAL EXPENSES	R2600									18 683 411

### S.05.02.01 Premiums, claims and expenses by country

as of 31 December 2019		Home Country	Top 5 co	ountries (by amou	nt of gross premiu	ms written) – non-	life obligations	Total Top 5 and home country
CHF		C0150	C0160	C0170	C0180	C0190	C0200	C0210
	R1400		(CH) Switzerland	(IT) Italy	(UA) Ukraine	(AT) Austria	(SI) Slovenia	
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
PREMIUMS WRITTEN								
Gross	R1410	0	278 844 529	37 810 253	37 792 743	15 011 869	2 210 758	371 670 152
Reinsurers' share	R1420	0	0	0	0	1 689 505	0	1 689 505
Net	R1500	0	278 844 529	37 810 253	37 792 743	13 322 365	2 210 758	369 980 647
PREMIUMS EARNED								
Gross	R1510	0	278 844 529	37 810 253	37 792 743	15 011 869	2 210 758	371 670 152
Reinsurers' share	R1520	0	0	0	0	1 689 505	0	1 689 505
Net	R1600	0	278 844 529	37 810 253	37 792 743	13 322 365	2 210 758	369 980 647
CLAIMS INCURRED								
Gross	R1610	0	85 662 711	66 821 453	0	5 713 853	0	158 198 017
Reinsurers' share	R1620	0	77 385 025	0	0	492 581	0	77 877 606
Net	R1700	0	8 277 686	66 821 453	0	5 221 271	0	80 320 410
CHANGES IN OTHER TECHNICAL PROVISIONS								
Gross	R1710	0	60 618 841	0	0	-17 969 003	0	42 649 839
Reinsurers' share	R1720	0	60 618 841	0	0	-2 061 173	0	58 557 669
Net	R1800	0	0	0	0	-15 907 830	0	-15 907 830
Expenses incurred	R1900	11 663 096	2 573 346	0	0	3 602 692	0	17 839 134
Other expenses	R2500							844 277
TOTAL EXPENSES	R2600							18 683 411

### S.12.01.02 Life and Health SLT Technical Provisions

as of 31 December 2019			Index-li	nked and unit-li	nked insurance		Othe	r life insurance			
		Insurance with profit participation	Index-linked and unit-linked insurance	Contracts without options and guarantees	Contracts with options or guarantees	Other life insurance	Contracts without options and guarantees		Annuities temming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted i reinsurance	Total (Life other than health insurance, incl. Unit-Linked)
CHF		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150
Technical provisions calculated as a whole	R0010	0	0			0					0
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	e R0020										
TECHNICAL PROVISIONS CALCULA	ATED A	S A SUM OF	BE AND RM								
BEST ESTIMATE											
Gross Best Estimate	R0030	25 053 161		4 307 020 695	1 056 866 663		402 329	2 092 674			5 391 435 522
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080	19 178 854		0	1 056 866 663		0	0			1 076 045 518
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total		5 874 307		4 307 020 695	0		402 329	2 092 674			4 315 390 004
Risk Margin	R0100	94 732	20 282 147		· · · · · · · · · · · · · · · · · · ·	9 434					20 386 313
AMOUNT OF THE TRANSITIONAL	ONTEC	CHNICAL PR	OVISIONS								
Technical Provisions calculated as a whole	R0110	0	0			0					0
Best estimate	R0120	0		0	0						0
Risk margin	R0130	0	0		· · · · · · · · · · · · · · · · · · ·	0					0
TECHNICAL PROVISIONS - TOTAL											

#### S.23.01.01 Own funds

as of 31 December 2019		Total	Tier 1 – unrestricted	Tier 1 – restricted	Tier 2	Tier3
CHF		C0010	C0020	C0030	C0040	C0050
BASIC OWN FUNDS BEFORE DEDUCTION FOR PARTICIPATIONS IN OTHER FINANCIAL SECTOR AS FOR IN ARTICLE 68 OF DELEGATED REGULATION (EU) 2015/35	ESEEN					
Ordinary share capital (gross of own shares)	R0010	5 000 000	5 000 000			
Share premium account related to ordinary share capital	R0030	45 636 930	45 636 930		0	
linitial funds, members' contributions or the equivalent basic own -						
fund item for mutual and mutual-type undertakings	R0040	3 000 000	3 000 000		0	
Subordinated mutual member accounts	R0050	0		0	0	0
Surplus funds	R0070					
Preference shares	R0090	0		0	0	0
Share premium account related to preference shares	R0110	0		0	0	0
Reconciliation reserve	R0130	44 078 103	44 078 103			
Subordinated liabilities	R0140	0		0	0	0
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	0	0	0	0	0
OWN FUNDS FROM THE FINANCIAL STATEMENTS THAT SHOULD NOT BE REPRESENTED BY THE RECO AND DO NOT MEET THE CRITERIA TO BE CLASSIFIED AS SOLVENCY II OWN FUNDS	NCILIA	TION RESE	ERVE			
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	0	0	0	0
Total basic own funds after deductions	R0290	97 715 033	97 715 033	0	0	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	0			0	
Unpaid and uncalled preference shares callable on demand	R0320	0			0	
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0			0	
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0			0	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	0			0	
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	0			0	
Supplementary members calls – other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	0			0	0
Other ancillary own funds	R0390	0			0	0
Total ancillary own funds	R0400	0			0	0
AVAILABLE AND ELIGIBLE OWN FUNDS						
Total available own funds to meet the SCR	R0500	97 715 033	97 715 033	0	0	0
Total available own funds to meet the MCR	R0510	97 715 033	97 715 033	0	0	
Total eligible own funds to meet the SCR	R0540	97 715 033	97 715 033	0	0	
Total eligible own funds to meet the MCR	R0550	97 715 033	97 715 033	0	0	
SCR	R0580	35 793 541	77 7 13 033	-	-	
MCR .	R0600					
Ratio of Eligible own funds to SCR	R0620	273.00%				
Ratio of Eligible own funds to MCR	R0640	606.66%				
RECONCILIATION RESERVE		C0060				
Excess of assets over liabilities	R0700	102 715 033				
Own shares (held directly and indirectly)	R0710	0				
Foreseeable dividends, distributions and charges	R0720	5 000 000				
Other basic own fund items	R0730	53 636 930				
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	0				
Reconciliation reserve	R0760	44 078 103				
EXPECTED PROFITS						
Expected profits included in future premiums (EPIFP) – Life business	R0770	0				
Expected profits included in future premiums (EPIFP) – Non-life business	R0780	0				
Total Expected profits included in future premiums (EPIFP)	R0790	0				
пометронный росполниции с респишно (ст. н. т.)	107 70	- 0				

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

as of 31 December 2019				
	ca	Gross solvency pital requirement	USP	Simplifications
CHF	C0110		C0090	C0120
Market risk	R0010	11 926 632		
Counterparty default risk	R0020	7 842 590		
Life underwriting risk	R0030	30 321 483		
Health underwriting risk	R0040	0		
Non-life underwriting risk	R0050	0		
Diversification	R0060	-11 754 990		
Intangible asset risk	R0070	0		
Basic Solvency Capital Requirement	R0100	38 335 714		
Operational risk	R0130	2 571 190		
CALCULATION OF SOLVENCY CAPITAL REQUIREMENT		C0100		
Loss-absorbing capacity of technical provisions	R0140	0		
Loss-absorbing capacity of deferred taxes	R0150	-5 113 363		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	0		
Solvency capital requirement excluding capital add-on	R0200	35 793 541		
Capital add-on already set	R0210	0		
Solvency capital requirement	R0220	35 793 541		
OTHER INFORMATION ON SCR				
Capital requirement for duration-based equity risk sub-module	R0400			
Total amount of Notional Solvency Capital Requirement for remaining part	R0410			
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420			
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430			
Diversification effects due to RFF nSCR aggregation for article 304	R0440			

# S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity Linear formula component for life insurance and reinsurance obligations

as of 31 December 2019		C0040			
MCR <sub>L</sub> Result	R0200	30 553 478			
				Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
CHF				C0050	C0060
Obligations with profit participation – guaranteed benefits			R0210	5 841 100	
Obligations with profit participation - future discretionary benefits			R0220	33 207	
Index-linked and unit-linked insurance obligations			R0230	4 307 020 695	
Other life (re)insurance and health (re)insurance obligations			R0240	5 629 835	
Total capital at risk for all life (re)insurance obligations			R0250		102 447 272

# S.28.01.01 Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity (continued) Overall MCR calculation

CHF		C0070
Linear MCR	R0300	30 553 478
SCR	R0310	35 793 541
MCR cap	R0320	16 107 094
MCR floor	R0330	8 948 385
Combined MCR	R0340	16 107 094
Absolute floor of the MCR	R0350	4 015 240
		C0070
Minimum Capital Requirement	R0400	16 107 094

#### Contact

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