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Financial Sector Regulation Act, 2017

Proposed Guidance Notice

Guidance on liquidity risk management for insurers

Objectives of this Guidance Notice

A Guidance Notice is a regulatory instrument to assist insurers in complying with the requirements outlined in the relevant Governance and Operational Standards for Insurers (GOI). Standards enjoy legal standing and are intended to establish minimum requirements with which insurers must comply. Guidance Notices, whilst not having the same legal standing as Standards in terms of enforceability, nonetheless provide clarity on the application of the respective Standards. Insurers are not obliged to adopt or adhere to the proposed application methodology offered by the Guidance Notice and are free to demonstrate that the requirements of the Standards have otherwise been met through the use of alternative application methodologies.

This Guidance Notice sets out practices and guidelines aimed at assisting insurers in complying with the requirements of FSI 6 (Liquidity Risk Management), GOI 3 (Risk Management and Internal Controls for Insurers) and GOI 3.1 (Own Risk Solvency Assessment (ORSA) for Insurers.) as these standards apply to liquidity risk management for insurers. This Guidance Notice aims to illustrate approaches that should be considered in treating and managing an insurer's liquidity risk. Some elements of this Guidance Notice may not be relevant to all insurers in terms of the application of practices or guidelines, while other aspects may need to be varied based on an insurer's individual circumstances and characteristics.

This Guidance Notice may reference specific provisions within GOI standards and, as such, must be read in conjunction with the respective standards cited.

This Guidance Notice is not applicable to obligations where the policyholder bears the investment risk.

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1. Introduction

- 1.1 This Guidance Notice is issued in accordance with the provisions of section 141 of the Financial Sector Regulation Act, 2017(Act No.9 of 2017) and should be read in conjunction with Prudential Standard FSI 6 - Liquidity Risk Management, GOI 3 - Risk Management and Internal Controls for Insurers and GOI 3.1- Own Risk Solvency Assessment (ORSA) for Insurers.
- 1.2 The purpose of the Guidance Notice is to provide guidelines to insurers and reinsurers, on a solo level, on the application of Prudential Standards and Governance and Operational Standards (GOIs) relating to liquidity risk management.
- 1.3 This Guidance Notice does not provide exhaustive guidance on liquidity risk management. It is, therefore, incumbent on insurers to understand the liquidity risk (i.e., market and funding) they face and apply the guidance in proportion to their nature, scale, complexity, and risk profile to ensure compliance with the Insurance Act, 2017 and standards issued thereunder.

2. Background

- 2.1 Traditionally, insurers typically rely on premiums, income from investments, and other sources for liquidity. Nevertheless, insurers must maintain adequate liquidity to fulfil expected and unexpected payment obligations and funding needs. Liquidity risk management is therefore essential to the operation of the insurer, the protection of policyholders, and financial stability.
- 2.2 Past experience has demonstrated that even solvent insurers may experience material financial distress, including failure if liquidity is not managed prudently. Moreover, although the majority of an insurer's liabilities are long-term in nature or contingent on the occurrence of an event, certain activities may create significant and unanticipated demands for liquidity. Insurers with insufficient liquidity may therefore be forced to take remedial actions that can amplify or accelerate stresses through the financial system when confronted with stress events.
- 2.3 Liquidity risk is the risk that an insurer, although solvent, will not be able to meet its financial obligations as and when they fall due or without incurring significant unexpected costs. Liquidity is fundamentally different from solvency in that while both are essential to an insurer in remaining as a going concern, liquidity has a "real-time" dimension that solvency may not have.
- 2.4 Insufficient liquidity can cause failure in insurers that are otherwise solvent. As a result, the insurer's capital management framework may be inadequate to address liquidity risk. Liquidity risk is not mitigated through capital holding; it is mitigated through investment in liquid assets and having contingent funding sources in place.
- 2.5 Insurers generally manage liquidity risk in two portfolios, the shareholder and policyholder portfolios.
- 2.6 The policyholder portfolio is described as follows:

- 2.6.1 The liquidity risk is passed on to the policyholders, wherein the value of the payments of policyholder liabilities is linked to the realised value of the underlying assets. Therefore, there is no direct liquidity risk from these insurance contracts.
- 2.6.2 Residual liquidity risk that is not passed to policyholders and is borne by shareholders (e.g., if the realisable value of the assets is lower than the adjusted benefit payment due to limitations on the extent of allowable benefit adjustment arising from prescribed regulatory maximum adjustments or policy wording) and assets backing guaranteed product liabilities (shareholder risk products) results in liquidity risk for insurers.
- 2.7 Shareholder portfolio liquidity risk results from risk assumed by the shareholders in respect of all shareholder-backed activities.
- 2.8 Integrated liquidity risk management can provide insight into strategic initiatives, product design and pricing, investment allocation, and operational resilience.

3. Governance

- 3.1. An insurer should have an adequate governance framework for liquidity risk, which supports the identification, assessment, management, reporting, and planning of risk-mitigating decision-making. The governance and risk management framework should be proportionate to the insurer business's nature, scale, and complexity.
- 3.2. An insurer should develop a board-approved risk appetite and tolerance¹ for liquidity risk. The Board should be responsible for the effectiveness of the risk appetite or tolerance on an ongoing basis. In performing its responsibilities, the Board should review the insurer's liquidity risk practices and performance to ensure that the insurer is operating within the board-approved risk appetite and tolerance at least quarterly. The board may delegate this responsibility to a sub-committee but it remains ultimately responsible for ensuring that the insurer effectively manages its liquidity risk.
- 3.3. The following elements are critical components of an insurer's liquidity risk management framework:

¹ Risk tolerance is the level of acceptable deviation from an organisation's risk appetite.

- 3.3.1. Clearly defined liquidity risk appetite statement and limits approved by the Board;
- 3.3.2. Documented liquidity risk policies and risk management strategy;
- 3.3.3. Processes aligned with the liquidity risk appetite and risk management strategy;
- 3.3.4. Adequate allocation of resources and appropriate segregation of responsibilities;
- 3.3.5. Appropriate systems and reporting procedures to report information to management in a timely and adequate manner to measure, assess, and monitor all material sources of liquidity risk both at solo and group level;
- 3.3.6. Forward-looking scenario analysis and liquidity stress testing programs based on severe but plausible assumptions; and
- 3.3.7. Defined metrics and tools for measuring liquidity risk drivers and early warning indicators.
- 3.4. Senior Management is responsible for applying the insurer's risk appetite in line with its strategic objectives and should ensure that such risk appetite is integrated into the day-to-day activities of the insurer.
- 3.5. The insurer's liquidity risk management framework should be reviewed for adequacy and effectiveness by the risk management function and the internal audit function to ensure that the insurer is operating within the liquidity risk appetite, and in line with the liquidity risk policy and procedures.
- 3.6. The insurer should establish and maintain an appropriate process for monitoring liquidity risk. This should include a process for management reporting, which provides clear, concise, timely, and accurate liquidity risk reports to relevant functions within the insurer. Reports on liquidity risk should be regularly provided to the insurer's board and the sub-committee, senior management, and other appropriate personnel. Reports to the insurer's board and the board sub-committee may be less detailed and less frequent than reports to senior management responsible for managing liquidity risk.
- 3.7. Senior Management should receive timely and precise information from all individual entities on the respective entities' liquidity risk position and emerging liquidity stress events. Senior Management should report periodically to the insurer's board and the board sub-committee on the current liquidity risk position, any emerging liquidity stress events, and the stress testing results, highlighting any vulnerabilities identified and proposing remedial actions.

- 3.8. In developing a liquidity risk appetite framework, the insurer should identify the duration, types, and severity of liquidity stresses it aims to survive and, in doing so, define the following:
- 3.8.1. Time horizons over which the identified risks are expected to materialise with multiple tenors considered;
 - 3.8.2. Types and values of assets that the insurer included in its high-quality liquid assets portfolio; and
 - 3.8.3. The minimum level of the high-quality liquid assets portfolio that the insurer intends to hold relative to stressed liquidity requirements in the time horizon considered in the different scenarios.
- 3.9. The insurer should regularly review its limits and adjust as appropriate, and as the risk tolerance changes, it is expected that this review is done at least annually and as and when conditions materially change.
- 3.10. An insurer should detail its liquidity risk profile and high-level approach to liquidity risk management in its ORSA.

4. Identification of material liquidity risk drivers

- 4.1. The insurer must identify and understand the drivers of its liquidity risk exposures and the implications of these liquidity risk drivers on its liquidity position, both under business as usual and stressed conditions. Liquidity risk drivers are specific to the insurer's business and should be identified relative to each insurer, structure, and class of business.
- 4.2. Some activities may increase the insurer's exposure to liquidity risk, where such activities may generate liquidity needs, potentially leading to an insurer's failure or generating systemic risk² under certain circumstances.
- 4.3. These include, but are not limited to:
- 4.3.1. Derivatives: Some derivatives contracts require collateral or a margin to be posted for mark-to-market movements in the value of the contract. These derivatives, used to hedge market risk arising from investments and liabilities, introduce potential liquidity risk on the insurer's balance sheet. A significant macroeconomic shock could trigger calls for additional margins or collateral, resulting in a liquidity risk event;
 - 4.3.2. Securities lending transactions: If funds received are reinvested in illiquid assets, sudden recalls of these funds could force the insurer to sell assets. In a stressed market, these sales could impact the insurer's creditworthiness, triggering more

² Systemic risk, as defined by the Bank for International Settlements (BIS), International Monetary Fund (IMF), and FSB (2009), refers to a risk of disruption to financial services that is caused by an impairment of all or parts of the financial system and has the potential to have serious negative consequences for the real economy.

collateral demands and leading to a price spiral as the lender sells assets to meet collateral needs; and

- 4.3.3. Liquid liabilities backed by illiquid assets: Some products offered by insurers contain provisions whereby a policyholder can withdraw cash from the policy with little notice or penalty. Where insurers do not adequately match such liabilities with sufficient liquid assets, this may lead to a liquidity shortage in certain circumstances and ultimately trigger fire sales³.
- 4.4. The following liquidity risk drivers should be considered in assessing and designing the liquidity stresses:
 - 4.4.1. Exposure to insurable events: consideration should be given to the nature, frequency, and severity of exposures to insurable events, including catastrophic events, pandemics, or material legal decisions that may occur within a short time horizon. The insurer should consider its dependence on reinsurance and the possibility that a material portion is temporarily uncollectible or not funded timely, even if ultimately collectible. Where the insurer holds collateral for reinsurance, it should consider the value and liquidity of the collateral in light of the stress event;
 - 4.4.2. Policyholder behaviour: this includes assessing possible withdrawals from different product types; some product features may create an immediate liquidity need, i.e., guarantees, surrender penalties, maturity dates, interest rate sensitivity, product purpose, borrowing costs for policy loans, and customer type. In determining potential stresses, assessments should include a potential reduction in regular premium receipts, non-renewals of contracts, and declines in new business and their impact on cash flows;
 - 4.4.3. The insurer's reputation or the policyholder's confidence in its financial position may trigger higher policy lapses or withdrawals. The insurer should consider the impact of this on their liquidity position;
 - 4.4.4. Contingent or off-balance sheet exposures: derivative cash flows and collateral requirements caused by deteriorating market conditions should be assessed. These include cash requirements from additional costs to rebalance the portfolios;
 - 4.4.5. Collateral needs arising from reinsurance arrangements and any other potential material liquidity needs arising from off-balance sheet commitments, contracts, and facilities;
 - 4.4.6. Impact of the insurer's credit rating deterioration: insurers should consider all types of outflows and collateral requirements resulting from credit downgrades of varying magnitude. This should include considerations of the types, quantity, and timing of potential collateral and margin requirements. This analysis should encompass retail and institutional policyholders as well as capital markets and reinsurance counterparties;
 - 4.4.7. Ability to transfer the liquidity across entities, jurisdictions, and portfolios: An insurer within a group should assess the transferability of excess liquidity within the group. Consideration should be given to legal, regulatory, and operational limitations to

³Fire sale generally refers to a forced sale in which a large volume of securities is sold within a short amount of time at dislocated prices.”

transfer liquidity and unencumbered assets between entities, business lines, and countries during normal and stressed conditions. A prudent assumption may be that, under stress, a part or the whole of intragroup liquidity may become non-transferable, so it is expected that the insurer will demonstrate that its approach to transferability is realistic;

- 4.4.8. As part of its stress testing, the insurer should appropriately address legally or operationally ring-fenced assets; such assets could include legally insulated unit-linked assets, closed blocks⁴, with-profit funds, or annuity product lines. Insurers should consider the fungibility of liquidity across their ring-fenced funds. The insurer should also detail how assets in these blocks may affect the insurer's balance sheet and its liquidity risk profile through guarantees, hedging programs, or other regulatory requirements to replace or maintain assets;
- 4.4.9. Foreign exchange convertibility and access to foreign exchange markets: An insurer should assess liquidity needs by individual currency to support an assessment of how shortfalls can be funded in a stressed market with impaired access to foreign exchange markets and loss of convertibility;
- 4.4.10. The reduction in secured and unsecured wholesale funding: An insurer should identify any wholesale funding⁵ and assess how the funding would behave under stressed conditions. This should include the risk of shortening tenors, for example, if the funding provider has call options or refuses to roll over or extend the funding maturity. A prudent assumption is that funding providers will be unable or unwilling to provide new unsecured borrowings or roll over or extend the maturity of existing funding for the length of the stress horizon. Wholesale funding that provides the counterparty with the optionality of acceleration, in particular, should be noted and elaborated on; and
- 4.4.11. Correlation and concentration of funding sources: The insurer should consider the instrument type, market, currency, and counterparty, including groups of related counterparties. This assessment should analyse the effectiveness of the diversification across the insurer's chosen sources of funding.

5. Stress testing

- 5.1. Through stress testing, the insurer develops a sound understanding of how its activities affect its liquidity risk profile under normal and stressed conditions; stress testing should therefore be robust as it plays a critical role in liquidity risk management. Refer to Annexure 1 for further guidance on the types of stresses insurers may consider.
- 5.2. An insurer's stress tests should include a range of severe but plausible scenarios, encompassing short-term and protracted macroeconomic fluctuations, sector-wide disruptions, and idiosyncratic events and a combination thereof that appropriately

⁴ Closed blocks refer to discrete pools of assets that are set aside to support the dividend expectations of participating policyholders from the periods before demutualisation, as well as anticipated policy benefits. Typically, changes in their values would be primarily offset by future changes in the dividend rates on these participating policies.

⁵ Wholesale funding generally refers to any financing from institutions

reflects its business's distinctive features. Refer to Annexure 1 for further guidance on the types of stresses insurers may consider.

- 5.3. Depending on its business model, an insurer may be vulnerable to different liquidity stresses compared to other insurers. Certain activities may contribute to larger or less predictable liquidity needs. Stress scenarios should be chosen to reveal potential vulnerabilities in the insurer's liquidity profile and approved by the board. In this way, the chosen stress scenarios should support management in identifying material risks of the insurer. The scenarios and model parameterisation should not be limited to historical events, distributions, and correlations but should also be forward-looking.
- 5.4. The insurer should assess the impact of its chosen scenarios on cash flows and liquidity resources both at the individual entity level and group level at the different time horizons (e.g., next day, 2-7 days, 8 days to 1 month, more than 1 month to 2 months, more than 2 months to 3 months, more than 3 months to 6 months, more than 6 months to 12 months).
- 5.5. The insurer should appropriately make conservative qualitative and quantitative assumptions in determining its stress scenarios. Key assumptions should be described and justified in relation to the level of severity of the scenario and relevant risk factors taken into account. In determining stress scenarios, the insurer is expected to be prudent; this includes not assuming the availability of uncommitted off-balance-sheet funding lines. While these may provide sources of funding under normal conditions, they may not be available when needed in times of stress, as a large number of institutions might try to seek funding from the same sources.
- 5.6. Other potential cash inflows, such as future premiums, may still be assumed to be available under stressed conditions. The insurer should adjust their assumed availability in line with the stress scenarios. In forecasting the cash flows, insurers are expected to assume that the book of policies remains stable over the year, therefore, no growth or decline in the book of policies. The insurer's determined responses during stress should be so that it does not significantly damage the insurer's reputation.
- 5.7. In conducting stress tests, insurers should avoid merely relying on capital-led stress scenarios and, where necessary, create separate scenarios outside the capital-led stress scenarios. This is because events that significantly impact capital may not significantly impact liquidity.

6. Composition and maintenance of highly liquid assets in the high-quality liquid assets (HQLA) portfolio

- 6.1. An insurer should hold a portfolio of high-quality liquid assets to cover any liquidity needs at a given time horizon, both in business as usual and stressed conditions. All assets within the portfolio should be documented at the appropriate level of granularity. Cash flow estimates from the business-as-usual projections and stress testing results may be useful to determine the appropriate level of assets sufficient to make up for any liquidity gap in line with the approved liquidity risk appetite.
- 6.2. Assets included in the HQLA portfolio should be highly liquid, that is, easily and immediately convertible into cash, either through outright sale or repo, at minimal to

no cost. The nature of these assets shall be that they have a low risk⁶, ease and certainty of valuation, and low correlation with risky assets. These assets typically also have a consistently active outright sale or repo market with evidence of the market breadth and depth with a diverse group of active buyers and sellers, i.e., they are "readily marketable." Finally, assets should have a proven record as a reliable source of liquidity during stressed market conditions.

- 6.3. Assets in this portfolio should be unencumbered. Unencumbered assets are free of any pledge, restriction, or limitation (including any contractual obligation that must be fulfilled before a contractual right may be exercised) that limits access to or the use or disposal of an asset.
- 6.4. There are natural differences in the liquidity of these assets that would limit the insurer's ability to monetise them during a stressed situation. As a result, the insurer should group assets according to their usability in stress with sufficient granularity to adequately manage risks in its liquidity profile. To ensure their realisability in stress and to minimise financial stability impacts from the monetisation of financial assets, insurers generally should not rely on assets with lower liquidity characteristics for short-term stress tests as they may be unable to monetise these assets quickly enough to meet liquidity needs. Moreover, large sales of assets with lower liquidity characteristics in a short time, particularly in stressed conditions, could impact market prices, thereby affecting similar assets held by other institutions.
- 6.5. Assets held in the HQLA portfolio should be considered as Level 1, Level 2a, or Level 2b. Level 1 assets are generally those of the highest quality and liquidity and are more likely to have willing buyers in very short time horizons, even during stressed conditions. Because of this, Level 1 assets should comprise at least a 60% share of the HQLA portfolio. Level 2a assets are still of high quality but will generally incur larger discount rates⁷ and/or take more time to find a buyer than Level 1 assets. Level 2b assets will, in general, have less active markets and therefore take even more time to find a willing buyer or will incur more substantial discount rates on sale during stressed market conditions.
- 6.6. For short-term stresses, for example, those of one month or less, insurers should rely more on Level 1 assets, though they may also consider limited quantities of Level 2a or Level 2b assets. For medium-term stresses, for example, those between one month and three months, the insurer should rely on both Level 1 and Level 2a assets but may also, in such circumstances, consider limited quantities of Level 2b assets to be appropriate. For longer-term stress periods, for example, those longer than three months, the insurer would likely be expected to sell assets more strategically to minimise losses. Level 1, Level 2a, and Level 2b assets could be allocated to the HQLA portfolio in appropriate quantities.
- 6.7. Assets included in the HQLA portfolio should not be concentrated in one asset class or correlated assets. This is to avoid a significant portion of the assets becoming illiquid just when they need to be used. Therefore, the insurer should regularly

⁶ Low risk means assets that tend to have higher liquidity; assets characterised by a high credit standing of an issuer and a low degree of subordination; and assets with a low duration, which is a measure of the price sensitivity of fixed income security to changes in interest rate, low legal risk, low inflation risk and denomination in a convertible currency with low foreign exchange risk.

⁷ A discount rate refers to a specific percentage that is used to reduce the market value of the underlying assets.

assess the concentration of the assets by the counterparty (including group-related) and instrument type.

6.8. The insurer should apply the appropriate discount rate to the fair market value of the assets in the portfolio to account for increased credit and market risk during a stress event. The insurer should also assess the transferability of the assets within the HQLA portfolio as it may be at a location with restrictions. It is also prudent to assume that assets within underwriting entities are not transferable elsewhere within the group to protect policyholders in times of stress. It is expected that intra-group transactions will be excluded from the analysis of an insurer's liquidity position on a group basis.

6.9. Assets should be classified as follows:

Asset type	Quality determinant* based on the national scale mapping	Classification	Discount rate*	Time horizon
Cash and Demand deposits	Sufficiently diversified and highly rated financial institutions and available within the time horizon.	Level 1	0%	Up to 1 month
				Up to 3 months
				Up to 12 months
Money market funds	Sufficiently diversified and highly rated financial institutions and available within the time horizon.	Level 1	0%	Up to 1 month
				Up to 3 months
				Up to 12 months
Securities issued by the sovereign and similar, backed by their full faith and credit.	Rated AA- / Aa3 or better	Level 1	0%	Up to 1 month
				Up to 3 months
				Up to 12 months
	Rated A- / A3 or better, but less than AA- / Aa3	Level 2a	15%	Up to 1 month
			0%	Up to 3 months
			0%	Up to 12 months
Securities issued by public sector entities, municipalities, and similar or guaranteed by the sovereign, backed by their full faith and credit.	Rated AA- / Aa3 or better	Level 1	0%	Up to 1 month
				Up to 3 months
				Up to 12 months
	Rated A- / A3 or better, but less than AA- / Aa3	Level 2a	15%	Up to 1 month
			0%	Up to 3 months
			0%	Up to 12 months
Vanilla corporate debt securities, including commercial paper	Rated AA- / Aa3 (A1 / P1 for commercial paper) or better;	Level 2a	15%	Up to 1 month
			0%	Up to 3 months
			0%	Up to 12 months
	Rated BBB+ / Baa1 (A2 / P2 for commercial paper) or better, but less than AA- / Aa3	Level 2b	50%	Up to 1 month
			25%	Up to 3 months
			0%	Up to 12 months

Asset type	Quality determinant* based on the national scale mapping	Classification	Discount rate*	Time horizon
	(A1 / P1 for commercial paper); -			
Covered bonds	Rated AA- / Aa3 or better	Level 2a	15%	Up to 1 month
			0%	Up to 3 months
			0%	Up to 12 months
	Rated BBB- / Baa3 or better, but less than AA- / Aa3	Level 2b	50%	Up to 1 month
			25%	Up to 3 months
			0%	Up to 12 months
Common equity shares	Publicly traded on a major exchange;	Level 2b	50%	Up to 1 month
			25%	Up to 3 months
			0%	Up to 12 months
Other fixed income instruments issued by public sector entities	Rated BBB+ / Baa1 or better	Level 2b	50%	Up to 1 month
			25%	Up to 3 months
			0%	Up to 12 months
Foreign currency liquid assets	Liquid foreign currencies are: USD: United States Dollar EUR: Euro GBP: British Pound		8%	Up to 1 month
			0%	Up to 3 months
			0%	Up to 12 months
Other assets	Demonstrated to have low credit risk, low volatility, and readily marketable and has a proven record as a reliable source of liquidity during stressed market conditions.	Level 2a	15%	Up to 1 month
			0%	Up to 3 months
			0%	Up to 12 months
		Level 2b	50%	Up to 1 month
			25%	Up to 3 months
	0%	Up to 12 months		

*The PA reserves the right to review the discount rates as it sees fit.

- 6.10. The foreign currency liquid asset discount rate should be applied on top of the specific level discount in cases where the assets are not backing foreign currency liabilities. Where assets are backing the same foreign currency liabilities, the discount rates to be applied should align with the specific asset level.
- 6.11. Insurers should take several additional considerations into account when including assets in the HQLA portfolio. To avoid double-counting, assets generating future cash-flows used as cash inflows in the insurer's liquidity stress test projections, for example, through a coupon or interest payments or maturities, should not be allocated to the portfolio as the insurer may not be willing or able to sell them without impacting its existing business or risk management strategies (i.e., it could not realise these cash flows if the asset were sold). This does not mean that assets

used to meet cash flow needs outside of the relevant time horizon could not be allocated to the buffer, as the insurer would likely have time to rebalance its portfolio.

- 6.12. The insurer should assess its ability to convert its HQLA portfolio into cash in a short time frame. This may involve periodically monetising a representative portion of the HQLA portfolio, either through repo or outright sale in the normal course of business. This may help the insurer test its access to the market, the effectiveness of its processes for monetisation, and the availability of the assets, and minimise the risk of negative signalling during a period of actual stress.
- 6.13. Even where policyholders fully bear these assets' investment performance risk, large-scale asset sales or purchases for these policies may still present operational challenges. As such, the insurer should consider its ability to monetise assets without compromising on either speed of disposal or price. As part of this assessment, the insurer should describe and justify all key assumptions about the amount of time needed to sell significant blocks of assets or the availability of willing counterparties for repo transactions. The insurer should also consider the impact of its actions on the broader market and financial stability.

7. Contingency funding planning

- 7.1. The insurer should conduct contingency funding planning to respond to liquidity stress events to assist the insurer in addressing stress situations where its liquid assets are insufficient or unexpectedly become illiquid. It should include actions that the insurer could realistically take to ensure that sources of liquidity are sufficient to maintain normal operations and continue to meet its financial obligations, including collateral needs, under stress scenarios. Such a contingency funding plan should describe the insurer's strategies for addressing liquidity shortfalls in liquidity stress situations timeously and at a reasonable cost.
- 7.2. To ensure the operational robustness of the plan, the insurer should annually test its contingency funding plan. The contingency funding plan should be reviewed and updated based on the stress test results and where there are significant changes in the business, to ensure that it remains adequate for the insurer. The insurer's contingency funding plan should address a range of plausible stresses in different time horizons, including intraday where relevant.
- 7.3. The contingency funding plan should include a diversified set of viable, readily available, and flexibly deployable management actions that the insurer would use to access alternative funding sources. For example, these may include off-balance-sheet liquidity facilities to the extent that such facilities cannot be unilaterally revoked, are already available, and can be accessed without further action by liquidity providers, such as new approval to access a liquidity facility.
- 7.4. The contingency funding plan should also describe when and how each action could be activated, the time needed to access funds, and the amount of funds that would be expected to be available from each contingency funding source in the given stress. The contingency funding plan should describe clear steps that allow the insurer to make timely and informed decisions, execute contingency measures efficiently, and communicate effectively. No one particular method, such as accessing a pre-funded liquidity facility, is expected to be included as part of the contingency funding plan. The contingency funding plan serves as a reference point to inform and guide the actions of the insurer in times of actual stress, though the

insurer's ultimate action should be adapted to the conditions of the actual stress event.

- 7.5. The contingency funding plan should include quantitative metrics or early warning indicators that the insurer would use to identify a range of liquidity stress events, including its impact on the insurer's liquidity position, HQLA portfolio, and available funding sources. Such metrics should be informed by the insurer's stress tests and could include sharp increases in interest rates, catastrophic events, steep equity market declines, multiple rating downgrades, or other events that could affect the policyholders' or counterparties' perception of the insurer's reputation and liquidity or solvency position. Based on these metrics, the contingency funding plan should define a variety of circumstances in which it would be invoked. The insurer may wish to use different metrics to differentiate between systemic and idiosyncratic liquidity stress. For instance, with idiosyncratic liquidity stress, the insurer may have a broader range of possible actions that it could use to raise liquidity or make more time to execute planned actions compared to systemic liquidity stress.
- 7.6. The contingency funding plan should specify the actions to be taken, their timing, the parties responsible for initiating them, and clear escalation procedures. The contingency funding plan should establish a clear allocation of roles and lines of management responsibility, defining procedures for identifying early warning indicators for potential liquidity stress events based on the distinctive features of its business. The contingency funding plan should also contain a governance process for escalation. It should establish lines of communication to ensure that the Board or the board sub-committee and senior management receive the necessary management information timeously. It is important that the relevant employees know the operational procedures to transfer liquidity and collateral across legal entities and accounts and the restrictions that govern such transfers.
- 7.7. The insurer's contingency funding plan should take into account the impact of stressed market conditions on its ability to monetise assets, including market-imposed discount rates or operational limitations, the impact of a freeze in typically available market funding options, the financial, reputational, or other consequences for the insurer of executing its contingency funding plan and its ability to transfer liquidity between entities. In addition, the contingency funding plan should clearly articulate the communication plan for both internal and external stakeholders.
- 7.8. The insurer may integrate its contingency funding plan into its recovery plan.

8. Risk appetite and risk limits

- 8.1. A vital component of liquidity risk management is a clear articulation of the acceptable level of liquidity risk that the insurer may assume to achieve its strategic objectives. This should be described in a risk appetite statement that defines the duration and type of stress or stresses that the insurer aims to survive. This statement should include both quantitative targets, such as excess liquidity or insurance liquidity ratios, and qualitative objectives. The insurer's risk appetite statement should be articulated in a manner that management at all levels can clearly understand and apply it to all aspects of liquidity risk management throughout the organisation. Accordingly, all elements of the liquidity risk management report should be consistent with the risk appetite statement.

- 8.2. To the extent possible, the insurer's liquidity risk management report should include a description of the systems and metrics used to measure and monitor liquidity risk. Several techniques can be used for measuring liquidity risk, ranging from simple calculations to highly sophisticated modelling. The degree of sophistication in risk metrics should be reflective of the scale, nature, and complexity of the insurer's activities.
- 8.3. To implement the insurer's stated risk appetite, based on these metrics, management should consider where limits should be set in accordance with the nature, scale, and complexity of the insurer's activities. Activities that may warrant limits to be set are:
- i. non-insurance liabilities maturing or redeemable within various time horizons;
 - ii. off-balance-sheet or other exposures that could create liquidity needs during stressed market conditions;
 - iii. concentrations of liquid assets and funding sources by currency, single counterparty or group of related counterparties, counterparty type, instrument type, and instrument seniority;
 - iv. liquidity risk arising from insurance liabilities;
 - v. maturity gaps; and
 - vi. the value or proportion of encumbered assets.
- 8.4. These limits should be documented in the insurer's liquidity risk management report, including how they interact with the insurer's stated risk appetite and current liquidity position.
- 8.5. Senior management should disseminate the insurer's liquidity risk policies and procedures to involved employees and ensure that these employees work cooperatively to implement these. Throughout its liquidity risk management report, the insurer should demonstrate how the liquidity risk appetite is applied, in particular, how it and the insurer's liquidity risk management report are integrated into the risk management framework and how they inform business decisions (i.e., a use test).
- 8.6. Regarding the use test, liquidity risk should be integrated with investment risks and influence business decisions around purchases, sales, and asset allocation. Liquidity risk and liquidity risk appetite should also influence product design when considering large policy limits, guaranteed rates, surrender periods, and benefits.

9. Analysis of the insurer's liquidity profile

- 9.1. The insurer should consider potential vulnerabilities in its liquidity profile, both insurance-related and non-insurance-related. The insurer's liquidity risk management report should discuss its outstanding products or any other sources in sufficient detail so that a reader can understand the liquidity risk profile. The insurer should pay particular attention to product features that may encourage withdrawals or otherwise create significant liquidity demands under certain circumstances, for example, the following:
- 9.1.1. To the extent the insurer provides group employee benefits schemes, it should describe the exposures and assess the potential liquidity needs that could arise from these products;

- 9.1.2. The insurer should describe any investment-type contracts⁸ or similar products. Where a trust or special purpose vehicle (SPV) or other structure is used to transform the maturity of the issued instrument, for example, in a funding agreement-backed securities programme, these structures may exacerbate liquidity risk, and the insurer should describe such structures in the report;
- 9.1.3. Any material outstanding legal decisions that could create liquidity needs;
- 9.1.4. The insurer's report should describe non-insurance liabilities that could contribute to liquidity stress. Detail should be provided about yield-enhancing activities, such as security financing transactions (SFTs) that the insurer engages in, including reinvestment practices and its internal policies regarding such activities; and
- 9.1.5. The insurer should also describe its hedging strategy and how it manages the associated liquidity risk, for instance, through margin calls.
- 9.2. The insurer should maintain adequate ability to measure, monitor, and report to the PA all insurance contracts that could present funding draws due to policyholder decisions. This is because the PA may request this information from insurers. This should be done at such a level to identify blocks of business that may behave similarly. Insurers should be able to monitor these amounts net of surrender penalties and market-value adjustments to assess maximum cash flow needs and to identify changes in the aggregate profile of a block's surrender charges.
- 9.3. In the ordinary course of business, the insurer should periodically produce cash flow projections commensurate with the relevant time horizon that incorporate, where applicable,
- i. anticipated claim and annuity payments;
 - ii. policyholder options, including surrenders, withdrawals, and policy loans;
 - iii. collateral requirements;
 - iv. expenses;
 - v. intercompany transactions;
 - vi. maturities and renewals of funding instruments, including through the exercise of provisions that could accelerate their maturity;
 - vii. premiums from new and recurring business;
 - viii. investment income; and
 - ix. any other potential cash flows that are relevant to the unique nature of the insurer's business and activities.
- 9.4. Cash flows should be reported with sufficient detail on the underlying activity and at sufficient granularity concerning the time interval for the insurer to assess areas for potential vulnerabilities. Cash flows from asset disposals should be accounted for separately. In its liquidity plan or cash flow projections, the insurer is expected to document and justify all key assumptions used in generating the cash flow projections. In the plan or cash flow projections, the insurer should also identify and

⁸ Investment-type insurance liabilities are those products that do not incorporate significant insurance risk. Examples of products that should be reported include Guaranteed Investment Contracts (GICs), Funding Agreements, Capital Redemption Policies, Annuities Certain, and Funding Agreement-backed or Fixed Annuity-backed securities.

analyse any potential, discrete, and cumulative cash flow mismatches over various time horizons as applicable to its activities and business.

10. Liquidity risk management report

- 10.1. The insurer should prepare and submit a liquidity risk management report annually, together with the ORSA, which includes at least the following:
 - 10.1.1. A liquidity risk appetite statement;
 - 10.1.2. Established liquidity risk limits;
 - 10.1.3. A discussion of the current liquidity position of the insurer relative to its liquidity risk appetite and limits;
 - 10.1.4. A summary of strategies, policies, and processes that the insurer has in place to manage liquidity risk;
 - 10.1.5. A discussion of potential vulnerabilities in the insurer's liabilities as well as the means of enhancing the liquidity position;
 - 10.1.6. A discussion of the extent entities or sub-groups of group companies are self-sufficient or dependent on liquidity support from other parts of the Group, including an opinion of whether such arrangements are both prudent and expected to respond in a stress scenario; and
 - 10.1.7. The insurer's approach to, and results of, liquidity stress testing.
- 10.2. A liquidity risk management report's key purpose is to document and demonstrate overall liquidity adequacy under business-as-usual and stressed conditions. The report sets out an insurer's approach to liquidity and funding. It should be self-explanatory so that any outside person familiar with the subject matter can easily understand it. The liquidity risk management report should also be tailored to the risks an insurer is exposed to.
- 10.3. The liquidity risk management report should be updated at least annually and when there are material changes to the nature, scale, and complexity of the insurer's activities, HQLA portfolio, and funding profile. The liquidity risk management report should be approved by the board of directors.

11. Regulatory Reporting

- 11.1. The insurer should ensure consistency between its liquidity risk management report and all other supervisory required documents, such as recovery plans and ORSAs.
- 11.2. As part of its liquidity risk management, it is recommended that the insurer should have tools in place to report, at the frequency determined and communicated by the PA, the ratio of the total available liquidity to stressed liquidity requirements, the Insurance Liquidity Ratio (ILR), under each time horizon, as produced by the stress test(s). Insurers should maintain an ILR of at least 100% in the 1-month time horizon, which reflects that there are enough high-quality liquid assets to meet stressed liquidity requirements in a time horizon of 1 month. Insurers should monitor

the ILR for the 3-month and 12-month time horizons as part of the stress testing and report the percentage calculated at the frequency determined by the PA.

- 11.3. The PA may collect additional information on the risks that may be relevant for a particular insurer as part of its monitoring of potential vulnerabilities arising from liquidity risk in the insurance sector.

Fundi Tshazibana
Chief Executive Officer

Date:

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Annexure 1 Guidance on stress scenarios

The PA has proposed the following list of non-exhaustive scenarios selected for stress analysis that insurers may employ to analyse the impact of a liquidity shock. Insurers should assess the probability of occurrence and whether the impact of the stress scenario is high, medium, or low for each scenario. The insurers are expected to disclose the scenario with the most significant impact on the regulatory return.

Type of stress scenario:

1. Insurer-specific liquidity crisis/name in the market crisis may include:
 - a. Market rumours coupled with a loss of confidence.
 - b. Inadequate liquidity management processes resulting in an inability to meet obligations as they fall due.
 - c. Operational loss.
2. Operational and periodic liquidity requirements may include:
 - a. Operational risk events, for example, cyber-attack
3. Systemic and cyclical crises may include:
 - a. Payment system disruption.
 - b. Contagion by association.
 - c. Equity or bond market disruption.
4. Capital market disruption.
5. Recession with broad credit and funding impairments.