OneFamily (EM) With Profits Fund annual report to policyholders for 2018

April 2019

I

Table of Contents

Section 1: Introduction	1
Section 2 : Summary	2
Section 3 : Governance arrangements for With Profits business	3
Section 4 : How we have complied with our PPFM	4
Payouts and bonus rates	4
Investment policy	4
New business	4
Management of free assets	4
Miscellaneous Surplus	4
Expenses and charges	5
Business Risks	5
Equity between different groups of policyholders	5
Section 5 : Changes to the PPFM	6

Section 1: Introduction

1.1 The purpose of this report is to explain how the OneFamily (EM) With Profits Fund ("the Fund") has been managed during 2018 and to demonstrate that we have followed our published Principles and Practices of Financial Management (PPFM). This includes the setting of bonuses and the investment decisions we have made.

1.2 If you require more technical detail about how we manage the Fund, our PPFM is available on our website:

http://www.onefamily.com/company-information/financial-reports/

Section 2: Summary

2.1 In the opinion of the Board, the management of the Fund has met the requirements of the PPFM over the period 1 January 2018 to 31 December 2018, and at the bonus declaration in respect of the year 2018.

- 2.2 This opinion takes into account all areas where discretion has been exercised, or where there have been any competing rights, or interests, between different groups of policyholders.
- 2.3 Appropriate governance arrangements have been maintained throughout this period to ensure that we comply with the PPFM in the conduct of OneFamily (EM) With Profits business.

Section 3: Governance arrangements for With Profits business

- 3.1 The Board has established a With Profits sub-committee of the Board, whose terms of reference include oversight of the management of the Fund. The composition of this Committee is the responsibility of the Board, and during 2018 it has consisted of four Non Executive Directors up to June 2018, and three Non Executive Directors for the remainder of the year. It is also attended by the Chief Executive, the Chief Risk Officer, the Chief Finance Officer and the With Profits Actuary.
- 3.2 The Non Executive Directors provide independent judgement in the assessment of compliance with the PPFM and how any conflicting rights of policyholders are addressed.
- 3.3 The With Profits sub-committee reviews all key developments for the Fund and regularly reviews its financial progress, referring matters to the Board for approval, as required by the PPFM. On an annual basis the With Profits sub-committee confirms that the Fund has been managed in accordance with the PPFM and this is reported to the Board.
- 3.4 The With Profits Actuary has provided advice on key aspects of discretion at the With Profits sub-committee meetings, when matters relating to the Fund have been discussed. The With Profits Actuary's report to policyholders in respect of 2018 can be found in the Appendix.

Section 4: How we have complied with our PPFM

4.1 There are a number of important areas where the Board has exercised their discretion in managing the Fund during 2018.

Payouts and bonus rates

- 4.2 Payouts made from the Fund during 2018 have reflected asset shares, subject to meeting any guaranteed benefits and allowing for smoothing in accordance with the PPFM. The calculation of asset shares was consistent with the PPFM.
- 4.3 In setting regular and final bonus rates and Market Value Reductions (MVRs) the Board have been supplied with sufficient information for it to be satisfied that they were calculated in accordance with the PPFM. All bonus rates, market value reductions and surrender scales were reviewed by the With Profits Actuary and the Board sub-committee.
- 4.4 Claims payouts were monitored throughout 2018 to ensure that payouts remained in line with the targets defined in the PPFM.

Investment policy

4.5 The investment policy for the Fund is regularly monitored by the With Profits sub-committee, and proposals for any changes in policy are reported to the Board for approval. The investment policy has remained largely unchanged during 2018 although the proportion of the Fund invested in equities decreased during 2018 mainly due to tactical investment manager decisions.

New business

4.6 The Fund was closed to new business with effect from 1 October 2016 and throughout 2018 it has been managed in accordance with the run-off plan approved at the time of closure.

Management of free assets

- 4.7 The Fund contains an amount of money over and above the amount expected to be paid to existing policyholders (based on asset shares and guarantees), and risk capital to comply with the Prudential Regulation Authority (PRA) regulations. This is known as the Free Assets. The Board has regard to the size of the Free Assets in its financial management of the Fund.
- 4.8 Due to the financial strength of the Fund some of the Free Assets can be used to improve policyholder payouts. This is done by uplifting asset shares by an agreed percentage at the point of claim when calculating final bonus rates, market value reductions and surrender values. The Board reviewed the uplift rate during 2018 and agreed to increase it from 38% to 40.5% for claims arising during 2019.
- 4.9 For future years the uplift rate may vary depending on the financial strength of the Fund at the time.

Miscellaneous Surplus

4.10 The Board is responsible for ensuring that profits, or losses, arising from exposure to business risks are allocated fairly to all policyholders having regard to the source of the profit or loss. At

the end of 2018, the amount of miscellaneous profits arising was small and this was added to the Free Assets in the fund.

Expenses and charges

4.11 The expenses and tax charged to the Fund, and the way in which these are apportioned to products, are reviewed on a regular basis. During 2018, the amounts of expenses and tax charges made to the Fund were in accordance with the expense and other legal agreements in operation, and documented in the PPFM. These amounts were reviewed by the With Profits Actuary.

Business Risks

4.12 Risks were monitored regularly throughout the year and a full risk assessment for the Fund was carried out in 2018.

Equity between different groups of policyholders

- 4.13 Different groups of OneFamily (EM) With Profits policyholders have potentially competing interests due to :
 - Different products
 - Policies of different size, or duration
 - Policies with different entry dates, claim dates or dates of birth
- 4.14 The main areas in which judgement is required in balancing the interests of different groups are with regards to the smoothing of policy benefits, and the way in which policies are grouped when determining payouts. The approach taken to smoothing and grouping is described in the PPFM and was applied in determining payouts in 2018.

Section 5: Changes to the PPFM

- 5.1 The PPFM describes how the Fund is managed on an ongoing basis.
- 5.2 The Financial Conduct Authority removed the requirement to produce a Consumer Friendly PPFM ("CFPPFM") towards the end of 2016 and the CFPPFM was removed from our website in 2017.
- 5.3 Some minor wording changes were made to the PPFM during 2018 (including removal of a reference to the CFPPFM in the PPFM). These amendments do not represent changes to the principles or practices.
- 5.4 The current PPFM is available on our website.

Appendix A: Report from the With Profits Actuary

As With Profits Actuary for the OneFamily (EM) With Profits Fund, I advise the Board, and With Profits sub-committee of the Board, on key aspects of the discretion that they exercise.

I have been With Profits Actuary since March 2019.

I have been involved in all matters referred to in this report. In my opinion, based on the information and explanations provided to me by OneFamily, the discretion exercised by the Board during 2018 took your interests into account in a reasonable and proportionate manner.

In arriving at my opinion, I have taken into account where relevant the rules and guidance contained in the Financial Conduct Authority's Conduct of Business Rules (Treating with profits policyholders fairly).

The Financial Reporting Council ("FRC") sets technical actuarial standards ("TASs") for the members of the UK Actuarial Profession. This report is intended to comply with TAS 100: Principles for Technical Actuarial Work and TAS 200: Insurance, except that, in terms of completeness, I have not considered it necessary or desirable to repeat or elaborate on material that is covered by the Board report to which my report is annexed.

Rob Thurston BSc FIA

With Profits Actuary for the OneFamily (EM) With Profits Fund

2 April 2019