

The Pakistan Credit Rating Agency Limited



Life Insurance & Family Takaful Operator – Insurer Financial Strength (IFS) Rating *Assessment Framework*

Table of Contents

1.	Introduction	2
2.	Profile	3
3.	Ownership	3
4.	Governance	5
5.	Management	7
6.	Business Risk	10
7.	Financial Risk	15

Summary

PACRA 's Insurer Financial Strength rating for Life Insurance Companies is a representation of its opinion on a life insurer's relative ability to meet policyholders and contractual obligations. The opinion is not specific to any particular insurance policy or contract but reflects the overall ability of the life insurer. This opinion is arrived at by evaluating the life insurer's ownership, governance, management, business risk and financial risks. Overall, PACRA has a more favorable opinion on insurance companies, which have strong relative position, underwriting performance, investment, enterprise risk management, liquidity and reinsurance arrangements.

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1. Introduction

- Qualitative and quantitative factors
- All factors assessed on standalone *and* relative basis

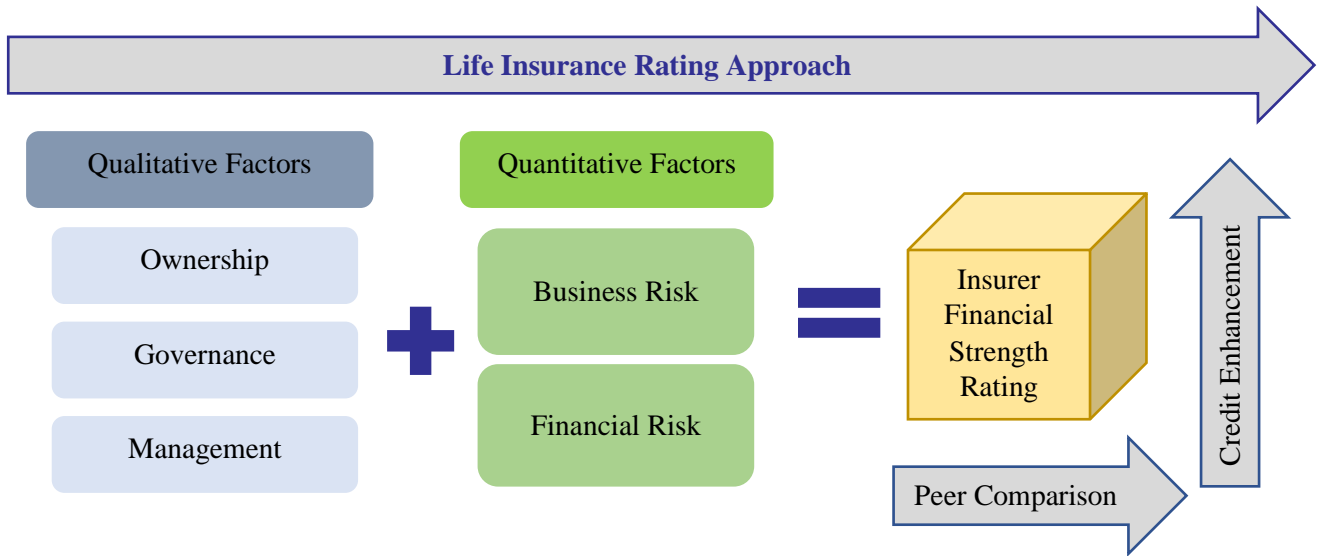
1.1 Scope: Insurer Financial Strength (IFS) rating of a life insurer is a representation of its opinion on a life insurer's relative ability to meet policyholders and contractual obligations. The basic objective of this methodology is to enhance transparency of PACRA's rating process by clearly specifying the relevant factors for Insurer Financial Strength (IFS) rating of life insurers/takaful operators¹. PACRA understands the distinction that life insurance carries with respect to its risks and challenges despite its generic commonality with general insurance business and hence recognizes the need to document its approach towards rating the life insurer's. This methodology draws upon the international perspective and the local experience gained through interaction with the market players and other participants of the broad financial sector of Pakistan.

1.1.1 The private sector was allowed to enter the life insurance market in the early 90s in Pakistan. It compares favorably with the Indian market where the state-owned life insurer – Life Insurance Corporation – controls ~70% of the market. Despite this comparability, the sector lags in terms of penetration and density compared to regional and international markets. This highlights growth potential as well as the extent of challenges that the sector is facing. Unlike general insurance, the fundamental target market for life insurance is retail, which poses a specific challenge to the industry. Diversity in distribution channels and effective utilization of available resources remains critical to growth. Family takaful operators, following the shari'ah principles, are also strengthening their foothold in the market. The business model, though having intrinsic strengths, may take a longer gestation period depending upon the extent of emerging competition.

1.1.2 Although this methodology follows a distinct analytical approach compared to PACRA's general insurers' ratings, the rating scale for life insurers' ratings and general insurers' is the same. This is because, despite differences, the ultimate risk being covered is the ability of the insurer to meet obligations towards the policyholders. PACRA also believes that insofar as obligations towards policyholders are considered, there is no difference between life insurance companies and family takaful operators, and the latter would simply be employing Islamic principles for the structure of the business. However the efficacy of these principles and the operators' adherence to them would remain the prerogative of the shari'ah advisors of the life insurer. This entails that IFS rating assigned to the family takaful operator would not be an opinion on the accuracy of the shari'ah principles and quality of operator's adherence to these principles but rather on its ability to meet obligations towards policy holders.

1.2 Rating Framework: The liabilities a life insurer covers belong necessarily to the future period. Therefore, it is utmost critical that the financial indicators of the life insurer remain stable over the medium term. Consequently, the approach that PACRA has employed is a blend of qualitative and quantitative data. The quantification helps in achieving objectivity in the rating process while the qualitative side helps in establishing the sustainability of the relevant factors in the foreseeable future. Neither all factors can be quantified nor do quantitative values portray the whole story. PACRA, therefore, seeks to employ a best combination of both to ensure comparability between ratings over time. Overall factors are categorized under these key areas: Profile, Ownership, Governance, Management, Business Risk and Financial Risk.

1.2.1 In August 2022, the SECP introduced a registration regime for digital-only insurers and dedicated micro insurers to promote digitalization and innovation. This framework is expected to enable expansion of insurance product range in Pakistan and greater financial inclusion. The factors described in this methodology apply to traditional as well as digital insurers.



2. Profile

- **Background:** Evolution and past strategy
- **Operations:** Key facts including nature of business, product slate, geographical location, etc.

2.1 Background: PACRA reviews the background of the life insurer to understand its evolution from where it started to where it currently stands. We analyze how and through what means the life insurer has achieved its desired expansion. PACRA looks at the progress of the life insurer from its historical past. The progress of the life insurer helps PACRA in determining the ability of the life insurer to successfully realize its strategy. The significant factor here for PACRA is to assess whether the life insurer has achieved its expansion through organic growth or through acquisitions. Meanwhile, the source of funding for desired growth is also critical.

2.2 Operations: The assessment of operations of the life insurer depends on the exposure of business segments and the lifecycle stage the business is in. Here, PACRA reviews the diversity and geographic spread of operations, product offerings, size of the franchise/portfolio, track record of operations, adherence to standard operating procedures, and policies and protocols. Size may be an important factor if it confers major advantages in terms of operating efficiency and competitive position.

3. Ownership

- **Ownership Structure:** Identification of man at the last mile.
- **Stability:** Succession planning at shareholder level
- **Business Acumen:** Knowledge, skills and experience of key shareholders
- **Financial Strength:** Willingness and ability of key shareholders to provide extraordinary financial support

3.1 Ownership Structure: The assessment of ownership begins by looking at the legal status of the life insurer. The level of perceived stability gradually increases from a sole proprietor to a listed company. This is followed by an in-depth study of the shareholding mix in order to disentangle structure of ownership. Key factors that are considered for this purpose include: i) shareholding structure which includes whether the individual(s) own the insurer directly or indirectly, ii) foreign or local shareholders, iii) whether the life insurer is owned by a single group or through a combination of entities and individuals, and iv) whether it is part of a group or a standalone entity. All these deliberations are done to identify the man at the last mile (or key shareholder). PACRA further considers how a life insurer is actually run, as, at times, entities are operated as family concerns despite being legally structured as companies.

Complex shareholding/ownership structures: In cases where the life insurer has a complex ownership structure, there are unique challenges in evaluating the decision-making process, lines of hierarchy and financial obligations and liabilities. In analyzing these life insurers, the fundamental issue is to explore the underlying reason or motivation for the complexity of the structure.

Insurance Companies which are owned by private individuals and families: On the one hand, the concentration of equity ownership might indicate that the majority shareholders have a strong vested interest in creating long-term value and closely monitoring management behavior. On the other hand, a potential concern in such cases is that the owners might rely heavily on extracting funds from the life insurer as source of income or to fund other business activities, potentially undermining the financial stability of the life insurer

3.2 Stability: In order to analyze the stability of ownership, a critical factor to be taken into account is succession planning. An important part of our background analytical work is an attempt to assess whether, and under the right of succession, the life insurer's prospects would be supported and by whom. This is particularly relevant in cases involving family-owned businesses and joint ventures, where disputes among shareholders could have a contagious effect on the sustainability of the life insurer. A stable ownership with clarity in succession, perhaps major shareholding held by a single family or group, is considered positive for ratings. On the contrary, high free float (in case of listed concerns) leads to risk of take over and may anchor lower ratings.

3.3 Business Acumen: Here PACRA gauges the shareholders' business skills. Having a strong business skill set has been critical for the sustainable success of the life insurer. PACRA analyzes the business acumen through two primary areas: i) industry-specific working knowledge and ii) strategic thinking capability. Meanwhile, a deep and applicable understanding of the system is critical to determine how a business achieves its goals and objectives. The scope includes the assessment and understanding of how the shareholders of the life insurer think about and successfully make the correct business decisions.

3.4 Financial Strength: PACRA analyzes the ability and willingness of the major shareholders to support the life insurer both on a continuing basis, and support in times of crisis. Here, PACRA gives due importance to: i) behavior of the major shareholders to provide timely and comprehensive support in times of need in the past, ii) prospective view of key shareholders, incase such need arises, iii) other businesses of major shareholders, and iv) the level of commitment of the major shareholder with the life insurer in providing capital support. In case of no explicit commitment by the shareholders, PACRA attempts to form a view on the availability of likely support. Support, in this context, refers strictly to financial support, rather than operational support. The scope for looking at other business of shareholders includes overall profiling of the key shareholders in the context of identifying the resources they have, outside the life insurer. Here, the standalone rating of the institution can benefit from having majority shareholders with very strong financial strength and commitment to the business. If, in a group structure, the financial strength of the shareholders is deemed to be weaker than that of the life insurer, this may bode negatively for the life insurer's standalone rating given the possibility that the life insurer may at some point of time be bound to extend financial support to its weaker parent.

Information Required on Ownership

- Shareholding pattern.
- Details of major shareholders' other businesses.
- Shareholders' financial information.
- Past pattern of support provided by the shareholders.

Ownership – Key Metrics

Ownership Structure
Identification of man at last mile

Stability
Succession planning at owners level

Business Acumen
Knowledge, skills, and experience of owner in insurance industry

Financial Strength
Willingness and ability of owner to provide financial support

4. Governance

- **Board Structure:** Composition of board in terms of size, independence and committees
- **Members Profile:** Relevance and diversity of board members' skills, knowledge and experience
- **Board Effectiveness:** Extent to which board properly discharges its responsibilities
- **Transparency:** Quality and extent of financial and non-financial information disclosure to stake holders

4.1 Board Structure: This comprises the assessment of the board on various criteria including overall size, presence of independent members, the duration of board members' association with the life insurer, overall skill mixes and structure of board committees. Size of the board may vary as per the scope and complexity of the operations of the life insurer. While a very small board is not considered good, similarly, reaching a decision in an effective and efficient manner may not be possible in case of a large board. A healthy composition of the board includes the presence of independent/non-executive members having limited relationship with the sponsoring group of the life insurer. Meanwhile, the chairman and CEO positions being held by the same individual is considered a weak governance practice. The chairman is expected to have a non-executive role. Compliance with the code of corporate governance is also examined. PACRA also examines the independence of governance framework from major shareholders. Lastly, PACRA evaluates the number of board committees, their structure, and how these committees provide support to the board. A board with a greater number of members should have a greater number of committees in place to assist in performing its role.

4.2 Members' Profile: PACRA collects information regarding the profile and experience of each board member. This helps in forming an opinion about the quality of the overall board. Moreover, diversification in terms of knowledge background and experience is considered positive. However, a fair number of board members should have industry-related experience. Here, director's trainings conducted by the life insurer are considered good. This is expected to equip the board members in fulfilling their role in an effective manner.

4.3 Board Effectiveness: In PACRA's view, the role of the board is to work with management in steering the life insurer to its performance objectives and to provide critical and impartial oversight of management performance. PACRA analyzes the type and extent of information shared with board members, along with the quality of discussions taking place at board and committee levels. Effective oversight requires frequent sharing of detailed information covering various aspects of business and market development. Meanwhile, PACRA also reviews the number of board meetings held during the year as these should be justified with the number of issues/matters arising. Board members' attendance and participation in meetings is important, and is gauged by viewing board meeting minutes.

4.4 Transparency: Quality of the governance framework is also assessed by the procedures designed by the board to ensure transparent disclosures of financial and other information. This can be achieved through: i) ensuring independence of the audit committee, ii) strengthening the quality of internal audit function, which may be in-house or outsourced, iii) improving quality of external audit by engaging auditors which are included in the State Bank of Pakistan's panel of auditors and/or have a satisfactory QCR rating

4.5 Environmental, Social, and Governance (ESG) Considerations: PACRA assesses how ESG factors are measured and incorporated in the overall strategy. In this regard, emphasis

is placed on the evaluation of board policies and compliance regarding ESG disclosures alongside adoption of related framework and reporting guidelines. The impact of ESG factors on the sustainability is also considered although in case of Life Insurance and Family Takaful companies this remains limited in terms of business profile due to the nature of underlying insurance policies.

Accounting Quality: PACRA reviews the quality of the life insurer’s accounting policies as reflected in its notes to accounts, auditors’ comments and other disclosures which are part of its financial statements. Adherence to accounting standards is assessed, particularly for unlisted concerns.

Quality of disclosures: A well-established information system is required for adequate disclosures. The characteristics of quality information includes timeliness, disclosures beyond the minimum regulatory requirements to improve transparency and consistency of such disclosures.

Information Required on Governance:

- Profile of BoD members
- Details of committees including TORs.
- Minutes of the board meetings.
- Information packs for the Board (MIS)
- ESG Framework, related policies and reports
- External auditor details.

Governance – Key Metrics

Board Structure
Composition of board in terms of size, independence and committees

Members’ Profile
Relevance and diversity of board members’ skills, knowledge and experience

Board Effectiveness
Extent to which board properly discharges its responsibilities

Transparency
Quality of financial and non-financial disclosures

ESG Considerations
Compliance with ESG disclosures, and policies regarding sustainability

5. Management

- **Organizational Structure:**
Alignment of organogram with life insurer size, nature of business and requirements
- **Management Team:**
Relevance and diversity of skills, knowledge and experience of top management
- **Management Effectiveness:**
Extent to which top management properly discharges duties and role of technology infrastructure therein
- **Claim Management System:**
Quality, independence of claims handling department
- **Investment Management:**
Structure and profile of investment function, quality of investment policy
- **Risk Management Framework:**
Independence and effectiveness of risk management system
- **Enterprise Risk Management:**
Integration of risk management approach throughout operations

5.1 Organizational Structure: The assessment of management starts with PACRA conducting an in-depth analysis of organizational structure of the life insurer. On a standalone basis, PACRA looks into the hierarchal structure, reporting line, dependence of the management team on one or more persons, and the coherence of the team. However, PACRA also places the organizational structure in the life insurer's relative universe for comparison in order to form an opinion on optimal structure within the sector in context of its complexity. Number of management committees established to monitor performance and assure the adherence to the policies and procedures is considered. PACRA measures the effectiveness of the life insurer by forming an opinion on the quality of management committees.

5.2 Management Team: Analysis of management includes evaluating experience profile of key individuals, management's track record to date, in building up sound business mix, maintaining operating efficiency and strengthening the life insurer's market position. Although judgment about management team is subjective, performance of the life insurer over time provides a more objective measure. PACRA analyses the quality and credibility of management's strategy, examining plans for achieving growth. Frequent turnover/loss of key personnel, particularly members of senior management, can have potentially adverse effects on overall standing of the life insurer relative to peers. Hence, HR turnover is reviewed to determine the stability of critical staff, with particular focus on key departments. Similarly, dependence of the management team on one or more persons is considered risky. In addition, the life insurer's human resource policies are also reviewed to gauge its emphasis on retaining and recruiting vital staff.

***Field Staff:** The role of mid- and low-tier staff is critical in maintaining relationship with the policy holders. Any misconduct on their part may lead to deterioration in the institution's underwriting or retention of business. Thus, the life insurer's ability to retain good field staff is considered important while assessing human resource management. Moreover, PACRA attempts to understand the client's staffing policies, local language ability of the staff dealing with prospective clients and policy holders, and their training on social aspects.*

***Key-person Risk:** Key-person risk occurs when a life insurer is heavily reliant on an individual, or a limited number of individuals, who are accepted as the key holder(s) of important intellectual capital, knowledge or relationships. While this type of risk is more commonly identified in small to medium- sized entities, it can also exist in larger entities and is relatively challenging to benchmark, and hence, mitigate. PACRA attempts to identify the extent to which a life insurer is dependent on the expertise of such individual(s) and to ensure policies exist for managerial succession to limit the adverse impact of such a person unexpectedly leaving the life insurer.*

5.3 Management Effectiveness: PACRA conducts qualitative review of management systems and technology infrastructure to assess management effectiveness. A key measure of management effectiveness is its track record of delivering on past projections and sticking to strategies. One of the key tools available to management to effectively run an organization is the information provided to it. It is critical that information available to management be concise, clear and timely, so it can be interpreted and understood, and the management can respond accordingly. An important part of this analysis is looking at the life insurer's MIS. PACRA further assesses whether management has developed any critical success factors to evaluate performance of various business segments, and their efficacy. Management meeting minutes are also reviewed, wherever available, to assess the quality of discussion.

***MIS:** System generated – real-time based – MIS reports add more efficiency in decision making whether related to operational, financial or strategic issues. PACRA evaluates the quality and frequency of the MIS reports used by the management team to ascertain that decision-making within the life insurer is information-based.*

5.4 Claim Management System: The Claims department has to be independent of underwriting and marketing. It must be resourced fully both in terms of manpower and infrastructure including MIS. A senior, experienced and independent Head of Claims can ensure that the mandate of Claims department is fulfilled. In the case of digital-only insurers, claim lodgment, payment systems and claims processing status are expected to be fully digitalized. Therefore, PACRA may gauge the quality of these systems through soliciting information about vendors or system-generated report samples.

***Claim Settlement System:** Claim settlement begins with the recording of the claim. Claims need to be booked immediately and without discrimination in the books of account; related provisions to be created and claims need to be tracked along the settlement process. Efficient claim settlement process depends a lot on technology integration. With technology, all stakeholders may be fully aware as to the stage and time further required for the settlement. Turn-around time is important for a single claim and for the portfolio of claims; this can be monitored through detailed MIS reports.*

5.5 Investment Management: PACRA evaluates the investment management function on aspects, including: i) structure of function, ii) experience of staff, iii) investment policy and iv) role of MIS. PACRA places emphasis on the quality of the investment committee and expertise of the investment manager. The investment committee must include members who are savvy to investment decision making while the investment managers must also be experienced and well entrenched into the equity and debt market depending upon the portfolio of the insurance company, since it is crucial to ensure that assets are adequate to meet the potential short and long-term needs of its liabilities. In addition, investment policy statement, duly approved by the Board, is the document that lays down the investment philosophy of the life insurer. PACRA assesses whether the statement covers key areas such as i) proposal generation, ii) decision making, iii) investment allocation, iv) benchmarks, and v) performance evaluation.

***Market Risk:** PACRA's analysis of market risk incorporates structural risks (such as interest-rate risk management), equity risk, currency risk, real estate and related risks, and/or other trading risks where present. Scrutinizing the duration of the life insurers' liabilities compared to its assets is crucial. PACRA reviews the asset and liability management strategy to assess the risk appetite of the life insurer. Board and management policy limits are typically expressed as earnings at risk limits. These are usually evaluated along with reports from management systems. Market risk on its own may not be a rating driver; however, poor market risk management or aggressive market risk-taking without mitigants would likely pressure a life insurer's ratings.*

5.6 Risk Management Framework/Control Environment: This includes an analysis of the life insurer's appetite for risks and the systems in place to manage these risks. PACRA examines the independence and effectiveness of the risk management function, the procedures and limits that have been implemented, limits setting authority and the degree to which these procedures are adhered to. PACRA endeavors to assess senior management's understanding of and involvement in risk management issues and examine the reporting lines in place. In recent years, there has been a noticeable upgradation in the risk management systems of the life insurer's, in the face of increasing guidance and supervision SECP. Insurance companies are primarily governed under the Insurance Ordinance, 2000.

5.7 Enterprise Risk Management: PACRA evaluates the ERM to assess whether a life insurer executes risk management practices across the enterprise in a systematic and consistent manner. Our primary focus is to assess whether a life insurer addresses risk through silos i.e., each risk area is conducted as narrowly focused and fragmented activities or instead adopts an integrated approach across all functions. PACRA also assesses the extent to which the life insurer effectively limits key risks within its appetite to optimally achieve its business goals and objectives. The ERM assessment consists of four sections: role of the board, risk culture, risk exposure management, and risk optimization.

Operational Risk: *In the context of Basel II and Basel III, operational risk is defined as “the risk of loss resulting from inadequate or failed internal processes, people and systems or external events”. Our analysis of operational risk focuses on a number of issues, including (a) Life Insurer’s definition of such risk, (b) the quality of its organizational structure, (c) operational risk culture, (d) approach to the identification and assessment of key risks (e) data collection efforts, and (f) overall approach to operational risk quantification and management. Extent of technological integration is considered crucial in mitigation of operational risks such as fraud, cyber risk, loss of data and technological disruptions in critical processes. High degree of automation in day-to-day operations is considered favorable to operational risk management.*

Reputation and Other Risks: *Reputation risk may emanate from operational problems or failure in any risk management systems. It may be difficult to evaluate but could adversely affect the life insurer’s rating in cases where it is significant. In addition to reputation risk, any regulatory non-compliance may lead to legal risk with potential ramifications as well.*

Information Required on Management:

- Organogram
- Profile of senior management
- Redundancy pattern
- MIS reports, risk management framework and details of technological infrastructure
- Management meeting minutes
- Policies and SOPs
- A brief write-up on claim management system
- A brief write-up on investment management framework

Management – Key Metrics

<p>Organizational Structure Alignment of organogram with size, nature and complexity of business</p>	<p>Management & Effectiveness Relevance & diversity of management skills, knowledge and experience</p>	<p>Claims Management System Quality of systems in place</p>	<p>Risk Management & Control Environment Robustness of systems and processes</p>
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6. Business Risk

- **Industry Dynamics:** Systematic risks and opportunities in operating environment
- **Relative Position:** Current standing among peers
- **Persistency:** Customer retention and continuity in premium inflows
- **Revenues:** Quantum, stability and diversification of inflows from core and non-core operations
- **Investment Performance:** Relative investment performance, risks associated with portfolio mix
- **Cost Structure:** Key costs and associated risks, and likely impact on profitability
- **Profitability:** Ability of insurer to translate earnings into bottom-line
- **Sustainability:** Soundness and viability of long-term strategy

6.1 PACRA has a structured approach towards evaluation of business risk, which integrates all the elements of the insurance business starting from the premium and ending with the surplus (or deficit) arising from the underwriting and investment operations. There are four components of financial statements to consider in case of a life insurer, namely, i) shareholders' fund, ii) profit and loss account, iii) statutory fund, and iv) revenue account. While the first two represent the life insurer's own balance sheet and income statement, the last two reflect underwriting business of the life insurer.

6.1.1 PACRA believes the business risk of a life insurer resides in the revenue account, which implies that profit and loss account of the life insurer should be viewed independently. This approach stems from an understanding that the fundamental viability of a life insurer emanates from the underwriting operations and the investment income from the premium/investment float. This is core to the business of the life insurer. The shareholders' fund, hence revenue account, represents a cushion that may be utilized to provide support to the life insurer in initial days or distressed times but its primary objective is to generate income for the shareholders. In comparison, statutory fund has an underlying objective of serving the policyholders, depicted as profit and loss account of the life insurer.

6.2 Industry Dynamics: The process for IFS rating of the life insurers builds on PACRA's understanding of the life insurer's industry dynamics. This understanding, following an in-depth research approach, is documented. The analysis captures the placement of the local industry in the international context to see the points of identity and distinction. In points of identity, the risks and challenges identified for the international players are re-evaluated for the local players, with a view to see whether the local players have established effective mitigants against those risks and taken due measures to meet the challenges. At the same time, PACRA identifies the risks and challenges specific to the local context of the industry. While conducting the analysis, PACRA takes a view on the industry alone, independent of the market players. This exercise helps PACRA to form a view on industry's significance in the economic environment of the country, its regulatory environment and likely support, if needed.

Economic Risk: PACRA analyzes basic economic indicators of the country including size and composition of economy, performance of important sectors, gross domestic product (GDP) growth, inflation, saving and investment trends. An important part of economic analysis is positioning of industry and impact assessment of economic risk factors on the industry.

Regulatory Environment: A well-regulated and supervised system is pivotal for credibility and stability of life insurer even when the operating environment is unfavorable. PACRA's evaluation of the regulatory system involves evaluation of criterion related to capital and other countercyclical measures to absorb risk and the extent of regulatory supervision and changes in response to the macro environment and prospective regulatory changes by SECP.

6.3 Relative Position: Relative position reflects the standing of the life insurer in the related market. The stronger this standing is, the stronger is the life insurer's ability to sustain pressures on its business volumes and underwriting margins. The standing takes support from various factors including market size, growth trends, and franchise value/brand value.

Market Share: Market size represents the life insurer's penetration in the chosen market. Size is advantageous as it provides ability to acquire larger business, pricing power and better expense management. There is a positive correlation between the life insurer's absolute and relative size and its market position and brand value. The large companies exercise greater power over the pricing, while ensuring commensurate profits. Small companies struggle to obtain business; and with less flexibility in the cost structure, their profits remain low. While absolute size is important, it is basically the relative proportion, which provides a clear yardstick to analyze the comparative strength of the market players. The more distant a player is from the average on the positive side, the stronger is its ability to reflect the characteristics just mentioned. In a dynamic industry, which is not characterized by concentration, PACRA believes that relative size would better capture the strength of the life insurer's standing in the related market. Having said that, size for the sake of size is not worth it, if the life insurer is unable to adhere to underwriting discipline and pricing superiority. The quality of risk management guidelines and their invariable implementation is the key to ensuring sustainability in the market position. Aggressive expansion at the expense of underwriting quality is considered negative while sustainable growth is viewed positively.

Growth Trend: While evaluating the size, PACRA looks at the rate of growth. Growth is important as it ensures that the life insurer continues to have the ability to meet (or beat) the industry's benchmarks. As the industry grows, it uplifts the scale of its operational context. This reflects in the ability of the players to invest in human resource, upgrade the control environment, enhance the product slate, increase the outreach, and improve the quality of service. To lag the industry's growth trend means to remain short on these avenues, putting pressure on the market position.

Franchise: The life insurer's brand reflects the strength of its image and reputation in the market, recognition and perception of its products by the distributors and ultimate clients. The brand also commands the clients' loyalty, ability of the life insurer to cross-sell, while bringing down its cost of distribution. Typically, higher and sustainable price trends would highlight the strength of the brand and/or franchise value. This would help the life insurer to strengthen its market share, ensure comparative growth rate and enjoy healthy margins. While a stronger combination of these enables the life insurer to withstand prolonged difficult market conditions, these also enable it to carve out new niches and tap emerging opportunities better than peers. Consequently, the strength of the competitive position would have a direct bearing on the rating of the life insurer.

6.4 Persistency: One of the measures to gauge brand loyalty, market perception and reputation of the life insurer is to see the retention rate. Life insurance is generally believed to be a long tail business unlike general insurance; therefore, continuation of the premium is fundamental to life insurance business. A life insurer incurs a lot of upfront cost for the acquisition of the business in view of its long-term retention. Persistency is important from many perspectives. While persistency implies profitability, it reflects that the client is satisfied with the product and the product provider on an overall basis. This, in turn, is a booster for further generation of business. While first year persistency is a healthy sign, the second year and beyond persistency provides assurance as to the sustainability of premium inflow to the life insurer. PACRA considers those life insurers having excellent ability which are capable of replicating largely the same premium in the succeeding years as in the first year.

6.5 Revenues: In measuring earning's quality of the life insurer, diversification and stability are very important factors. A life insurer with a diverse product slate with more than one revenue streams is considered better than the life insurer with a concentrated earning profile. PACRA sees concentration at both product and customer levels. In addition, the analysis of target markets to

which the life insurer serves forms a part of the assessment. Stability is measured through historical trend analysis of the life insurer's revenues.

6.6 Diversification: Diversification is desirable since it enhances the life insurer's ability to meet challenges, both present and upcoming. Based on this understanding, in assessing diversification across the operations of the life insurer factors which are considered as distribution channels, premium mix, product line, client concentration and geographic spread.

***Distribution:** Distribution is the way by which a life insurer reaches out to its clients. The strength (or weakness) of distribution directly affects the business prospects of the life insurer and hence its ability to repay policyholders. Diversity of distribution channels, the extent of their contribution towards the premium base and life insurer's ability to exercise control on these channels are some of the important things to evaluate. Diversity in the channels is desirable as it minimizes the life insurer's dependence on any specific channel and reduces the risk of sudden disruption in business. Diversity is important as it provides flexibility in aligning the life insurer's products to the needs of a specific segment of clients. After diversity, the next step is to look at the significance of each distribution channel. By significance, we mean the extent of premium being contributed by each channel. This would help differentiate critical channels from namesake channels. For rating purpose, it is worthy only to look at the critical channels. Business acquisition cost, which is an important consideration from profitability perspective, is also an offshoot of distribution framework of the life insurer.*

***Premium Mix:** The bloodline for the life insurer is the premium it generates. The premium comes to the life insurer in various forms and shapes, mainly determined by the type of policy being bought by the client. The policies may be classified from purely risk protection to saving schemes. The former mainly specifies the risk that these are covering while the latter represent investments much similar to the products of asset management companies. In between both extremes, there is a range of products which blend characteristics of both types, such as whole life, universal life and endowment. In Pakistan, the predominant nature of products belongs to the mid category, with the element of saving going up in the wake of rising demand for unit linked policies. Life insurance policies may also be classified according to the type of clients these serve: individual or group. Individual policies, sold to individuals, are viewed more favorably because these represent relatively higher stability and persistency. Group policies, covering a group of people, are usually term based and normally reflect a higher risk of claims and cessation. With reference to term, life insurance policies may be classified into permanent or temporary. Permanent policies remain effective until the death of the policyholder or the occurrence of the insured event. In Pakistan, permanent policies are predominantly represented by endowment. Endowment, apart from the risk coverage during the active period of the policy, has a cash value and therefore provides sum-assured to the policy holder at the maturity of the policy. Policyholders have the option to surrender such policies prior to the maturity and avail the cash value at that time. The life insurer remains exposed to the risk of occurrence of the insured event prior to maturity till the time the cash values of these policies are short of related sum assured. Permanent policies may have a single premium mechanism, whereby premium comes to the life insurer in one go or represent a regular stream of premium to the life insurer over the life of the policy. While the regular premium policies provide the advantage of stable source of revenue, the single premium policies cushion the risk of high payouts due to occurrence of insured event prior to the accumulation of cash values. While evaluating the premium mix, although a high value is placed on individual regular premium policies, those life insurers are viewed more favorably which develop an optimum mix of different type of policies, supplementing each other due to the related attached advantages.*

6.7 Investment Performance: The business model of insurance involves management of insurance float generated from the premium. This float is invested to make returns. The efficacy

of the infrastructure deployed to manage investments can only be gauged through evaluating the comparability of returns and consistency therein. For premium related to pure investments, the life insurer is further exposed to the risk of redemption if competitive performance is not delivered. This is judged through the movement of unit price, as investments normally represent unit linked policies in Pakistan. The performance of operator's own investments is compared against the performance of funds maintained for the benefit of the policyholders.

Quality of Investment Book: *The quality of the investment book is assessed to form an opinion on whether investments are concentrated in high-risk avenues. Apart from the equity investments, which are otherwise viewed in the context of the overall risk appetite of the life insurer, the remaining investments are evaluated from the perspective of the credit profile of the investee. Life insurers generally invest in long-term government securities. Investment in equities, if any, usually form a minor portion of the investment portfolio.*

Investment Income Contribution: *Investment income is the alternative revenue stream. It supplements the life insurer's profitability. This is the life insurer's earning over and above the underwriting income or loss, measured through combined ratio. Investment income contribution is computed by comparing the investment income against the underwriting income. Well run entities match investment income to underwriting income or supersedes it. PACRA evaluates the performance of the life insurer's investment portfolio to determine whether the life insurer is underperforming, meeting or exceeding relevant benchmarks.*

Strategic Investments: *Strategic Investments are considered good when these are cash producing; when these are cash consuming, they may end up pressurizing the life insurer's liquidity. PACRA measures the percentage of cash producing investments to cash consuming investments.*

6.8 Cost Structure: Cost structure is analyzed for the amount of flexibility provided when market conditions are less favorable. In this regard, PACRA considers how much of the cost base is variable. PACRA also evaluates the performance ratios relative to those of its peers to understand whether costs have been contained while growing assets and revenue. If expense ratios are high, it could be an indicator that the life insurer has a significant fixed cost burden. In this context, a key measure that PACRA looks at is the expense ratio. [(Net commission and other acquisition costs + Management expenses) / Net insurance premium]. Performance measures are not assessed in isolation as there may be variations that are caused by business model differences and the importance of ongoing investment in the life insurer's franchise. A low-cost base relative to peers offers the life insurer greater flexibility to deal with competitive pricing pressures.

6.9 Profitability: The clarity as to underwriting and investment operations is important as the life insurer is exposed to different risks with reference to each type of activity and it can ultimately impact the bottom-line. While the underwriting exposes the life insurer to the risk of occurrence of insured event, terminating into a payout of claim, the investments are only a matter of fee/commission income and spread of entry/exit depending upon the product profile. Therefore, PACRA believes that both lines of business should be independently evaluated. Takaful operators, being latest entrant into the market, are alive to this distinction. Their information management and disclosure practices allow independent analysis of both lines. As the industry grows and the competitive environment captures the different dimension of the life insurance business, PACRA expects that the data and information management and related disclosures would reach – indeed bypass – the benchmark currently set by the family takaful operators.

6.9.1 The surplus or deficit in the revenue account is impacted by various line items, which warrant independent analysis, including claims and management expenses. Another critical item is actuarial valuation, which underlies the life insurer's estimation as to the liabilities arising in

the future. PACRA assesses the quality of the actuarial framework deployed by the life insurer. For an in-house actuarial function, the educational and experience profile of the human resource, quality and extent of actuarial working and reports and the challenge which these are put to are some of the essential elements for the assessment in this regard. For external actuaries, the reputation and franchise value of the firm come into play. The objective is to form an opinion that the liabilities are not underestimated to achieve performance related milestones.

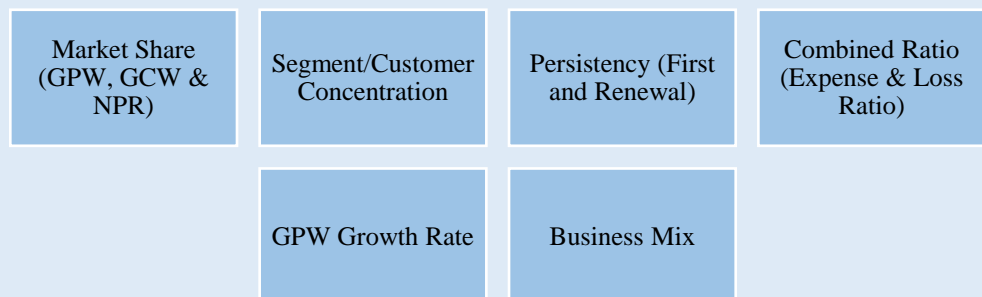
6.10 Sustainability: Earning prospects are also monitored, based on budgets and forecast prepared by the life insurance company. A reality check is performed while analyzing underlying assumption taken by the management as well as management’s track record in providing reliable budgets and forecasts.

Event Risk: *Incorporating the risk of unforeseen events into the life insurer’s rating opinion is challenging, given their unpredictable nature and magnitude of impact of the underlying event. These events may be external (e.g., M&As, regulatory changes, litigations or a natural disaster) or may be internally driven (unrelated diversification, system breakdown leading to significant operational risk or strategic restructuring) and can lead to substantial rating changes. PACRA applies its analytical judgment in assessing the likelihood of such occurrences and potential impact, insofar as may be possible, and assesses the life insurer’s track record, expertise of management team and level of financial discipline to incorporate the same into its ratings.*

Information Required on Business Risk:

- The life insurer’s medium-term business plan.
- Financial projections for next two years
- Actuarial valuation report
- Annual financial condition report
- Detail of gross premium written from 25 largest customers for each line of business
- Details of 25 largest claims intimated for each class of business separately
- Amounts pertaining to disputed claims
- Total sum insured consolidated and for each category separately, and the net share of the life insurer after reinsurance
- Break-up of investment book of the life insurer

Business Risk – Key Metrics



7 Financial Risk

- **Claims Efficiency:**
Quantum and timely repayment of outstanding claims
- **Re-Insurance:**
Quality of re-insurer and re-insurance arrangements
- **Liquidity:**
Sufficiency and quality of liquid assets against claims assessed by looking at liquid investments, quality of investments and cash collection from operations
- **Capital Structure:**
Equity cushion to absorb losses

7.1 Claims Efficiency: Timely repayment of claims carries utmost importance in the rating methodology. Claims efficiency represents the pattern in which claims are being settled by the life insurer. PACRA believes that life insurers having higher rating would be carrying lower quantum of outstanding claims in general circumstances (adjusted for one-off events). While this ensures ultimate satisfaction of the policy holder, it denotes spread-out of cash outflows over a number of periods instead of their accumulation to a single period. This safeguards the life insurer from building an undue pressure on the liquidity of the life insurer in any specific period.

7.2 Re-Insurance: Re-insurance is the risk coverage obtained by the life insurer against insurance claims. Herein, business philosophy of the life insurer with reference to risk retention comes into play. A high quantum of risk retention means higher exposure to claims though profits would be higher as well.

7.2.1 PACRA analyzes the receivables to be recovered from the reinsurers. The analysis of the amount of the life insurer's reinsurance recoverable, its concentrated reliance on a few reinsurers, and the credit quality of the individual reinsurers is important because write-offs of the recoverable as uncollectible could impact the life insurer's income and capital, and the loss of reinsurance capacity could require the life insurer to modify its market/product focus. PACRA looks at the kind of rating the re-insurer enjoys, their experience in the Pakistani market, historical relationship with the life insurer, treaty terms, and their respective share in the reinsurance pool. The major market for life insurance operators is individuals. This implies that the absolute size per risk exposure is bound not to exceed a certain limit except for few high-profile policyholders. It is therefore expected that cession levels would be on the lower side in the local market with less reliance on the re-insurers.

7.3 Liquidity: The liquidity profile of the life insurer is the ultimate cover that the life insurer has against claims. The life insurer may carry multiple shields against the claims. The first shield being the operational cash flows coming in the form of premium/contribution and return on investments. An effective structure deployed in the operational framework would ensure that a significant portion of claims is being met through the operational cash flows. The second shield is the liquid investment book. The investment book may represent investment in a mix of fixed income and equity securities. Equity securities are adjusted for those scrips wherein volumes are insignificant. PACRA believes that the mix of the investment book is critical in assessing the overall comfort which may be placed on the liquidity of the life insurer. While exposure towards the equity market may be determined by the investment philosophy of the life insurer, PACRA relates the extent of exposure with the overall risk profile of the life insurer and hence its IFS rating. The third shield of protection is the strategic investment book, if any. PACRA assesses the quality of the strategic book and its size in the light of the life insurers' liquidity requirement and attractiveness of the book for disposal.

7.4 Capital Structure: At the heart of PACRA's financial risk assessment lies the adequacy of the capital for the life insurer's business. Capital is pivotal for organizational sustainability, growth drive and as a last cushion against adverse circumstances. Capital, represented through the shareholder's fund, is essentially the support function in the life insurer's business. PACRA evaluates the capital in the context of the life insurer's business model. This understanding stems from the realization that the life insurer following a high risk and high growth business strategy would have an entirely different capital requirement as against the life insurer following a conservative business model. Nonetheless, the capital would remain the primary source of energy for both types of companies. While computing and analyzing the capital, PACRA considers the regulatory regime applicable to the life insurers and their internal models, if any, for judging the adequacy of capital.

7.4.1 In December 2022, the SECP issued a concept paper on the proposed shift from the current rule-based capital adequacy framework towards a risk-based capital regime for Pakistan’s insurance sector. This transition is envisioned to ensure that the level of capital maintained by an insurer is commensurate with the level of risk undertaken by it. This is expected to more accurately reflect various risks and capital buffers for individual insurers. The new regime would result in the Capital Adequacy Ratio (CAR) becoming a key metric in determining the loss absorption capacity of an insurer. While the capital adequacy levels have not yet been defined, PACRA will consider the applicable regulatory regime, once implemented, in its assessment of the insurer’s capital structure.

7.4.2 For a viable business, PACRA understands that the capital has to be serviced well. Therefore, analysis of the return on capital and its consistency is another importance aspect of capital adequacy assessment. While a life insurer is generating returns, it may have a varied policy with reference to the payout to the shareholders. PACRA believes that this policy should take due account of the existing and future needs of the life insurer’s business. Capital formation rate, the rate at which the life insurer adds to the capital after dividends, would determine accumulation of strength that the life insurer demonstrates on a relative scale.

Credit Enhancement: *The life insurer that carry third party commitment to make good an amount obligated to the lenders may provide additional support to its financial risk profile. In this case, in determining the impact on rating, key factors to assess are the financial profile of the third party and the extent of coverage – quantum and duration – it provides.*

Information Required on Financial Risk

- Re-insurance arrangements and policies
- List of "Treaties" along with the retention limits and details of surplus lines
- Number of policies above the retention limit and average amount of policy thereof
- Ageing analysis of a) premiums due but unpaid, b) reinsurance recoveries against outstanding claims, c) provision for outstanding claims, and d) amount due to agents
- Statutory returns submitted to SECP
- Break-up of premium: pure insurance premium and investment

Financial Risk – Key Metrics



Insurer Financial Strength (IFS) Rating

Insurer Financial Strength (IFS) rating reflects forward-looking opinion on relative ability of an insurance company to meet policy holders and contractual obligations.

Scale	Definition
AAA (ifs)	Exceptionally Strong. Exceptionally Strong capacity to meet policy holders and contract obligations. Risk factors are minimal, and the impact of any adverse business and economic factors is expected to be extremely small.
AA++ (ifs) AA+ (ifs) AA (ifs)	Very Strong. Very Strong capacity to meet policy holders and contract obligations. Risk factors are very low, and the impact of any adverse business and economic factors is expected to be very small.
A++ (ifs) A+ (ifs) A (ifs)	Strong. Strong capacity to meet policy holders and contract obligations. Risk factors are low, and the impact of any adverse business and economic factors is expected to be small.
BBB++ (ifs) BBB+ (ifs) BBB (ifs)	Good. Good capacity to meet policy holders and contract obligations. Risk factors are moderate, and the impact of any adverse business and economic factors is expected to be manageable.
BB++ (ifs) BB+ (ifs) BB (ifs)	Modest. Modest capacity to meet policy holders and contract obligations. Though positive factors are present, risk factors are relatively high, and the impact of any adverse business and economic factors is expected to be significant.
B++ (ifs) B+ (ifs) B (ifs)	Weak. Weak capacity to meet policy holders and contract obligations. Risk factors are high, and the impact of any adverse business and economic factors is expected to be very significant.
CCC (ifs) CC (ifs) C (ifs)	Very Weak. Very weak capacity to meet policy holders and contract obligations. Risk factors are very high, and the impact of any adverse business and economic factors may lead to insolvency or liquidity impairment
D (ifs)	Distressed. Extremely weak capacity with limited liquid assets to meet policy holders and contract obligations, or subjected to some form of regulatory intervention or declared insolvent by the regulator.

<p>Outlook (Stable, Positive, Negative, Developing) Indicates the potential and direction of a rating over the intermediate term in response to trends in economic and/or fundamental business/financial conditions. It is not necessarily a precursor to a rating change. 'Stable' outlook means a rating is not likely to change. 'Positive' means it may be raised. 'Negative' means it may be lowered. Where the trends have conflicting elements, the outlook may be described as 'Developing'.</p>	<p>Rating Watch Alerts to the possibility of a rating change subsequent to, or, in anticipation of some material identifiable event with indeterminable rating implications. But it does not mean that a rating change is inevitable. A watch should be resolved within foreseeable future, but may continue if underlying circumstances are not settled. Rating watch may accompany rating outlook of the respective opinion.</p>	<p>Suspension It is not possible to update an opinion due to lack of requisite information. Opinion should be resumed in foreseeable future. However, if this does not happen within six (6) months, the rating should be considered withdrawn.</p>	<p>Withdrawn A rating is withdrawn on a) termination of rating mandate, b) cessation of underlying entity, c) the debt instrument is redeemed, d) the rating remains suspended for six months, e) the entity/issuer defaults., or/and f) PACRA finds it impractical to surveill the opinion due to lack of requisite information.</p>	<p>Harmonization A change in rating due to revision in applicable methodology or underlying scale.</p>
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Surveillance. Surveillance on a publicly disseminated rating opinion is carried out on an ongoing basis till it is formally suspended or withdrawn. A comprehensive surveillance of rating opinion is carried out at least once every six months. However, a rating opinion may be reviewed in the intervening period if it is necessitated by any material happening.

Note. This scale is applicable to the following methodology(s): General Insurance & Takaful Operator, Life Insurance & Family Takaful Operator.

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