# The Prudential Assurance Company Limited

# Annual FSA Insurance returns for the year ended 31 December 2006

(Appendices 9.4 and 9.4A valuation reports)

The Prudential Asurance Company Limited is registered in England and Wales. Registered office at Laurence Pountney Hill, London EC4R 0HH. Registered number 15454. Authorised and regulated by the FSA.

# **Contents**

Ap	pendix 9.4	Abstract of valuation report	4	
Structure of the long term business			4	
1.	1. Introduction			
2.	Product rat	nge	7	
3.	Discretion	ary charges and benefits	8	
4.	Valuation	methods and bases (other than for special reserves)	11	
5.	Options an	d guarantees	17	
6.	Expense re	eserves	25	
7.	Mismatchi	ng reserves	27	
8.	Other spec	ial reserves	28	
9.	Reinsurand	ce	28	
10.	Reversiona	ary (or annual) bonus	34	
Ар <u>р</u> Арр Арр Арр	pendix 1 pendix 2 pendix 3 pendix 4 pendix 5 <b>pendix 9.4</b>	Valuation interest rates Mortality bases Annuities: expectations of life Morbidity bases Expense bases A Abstract of valuation report for realistic valuation	39 40 43 44 47 50	
An	pendix 6	Results from the PSALM model	75	
App	pendix 7	Initial annual reversionary bonus assumptions	76	
Ар	pendix 8	Reversionary and terminal bonus rates as a proportion of the sum assured	77	

Page

# VALUATION REPORT ON THE PRUDENTIAL ASSURANCE COMPANY LIMITED AS AT 31 DECEMBER 2006

## Structure of the long term business

## 1. Overview

The Prudential Assurance Company Limited (**PAC**) carries on ordinary branch and industrial branch business within its long-term fund. The industrial branch was closed to new business on 1 January 1995.

The long-term business of Scottish Amicable Life Assurance Society (SALAS) was transferred into PAC on 1 October 1997, and the long term business of Scottish Amicable Life plc (SAL) was transferred into PAC on 31 December 2002. The business transferred from SAL itself included business previously transferred into SAL from M&G Life Assurance Company Limited (M&G Life) and M&G Pensions and Annuity Company Limited (M&G Pensions).

The long term business is contained within the following four sub-funds:

- (a) Non-Profit Sub-Fund (**NPSF**)
- (b) Scottish Amicable Insurance Fund (SAIF)
- (c) Defined Charge Participating Sub-Fund (**DCPSF**)
- (d) With-Profits Sub-Fund (**WPSF**)

## 2. Non-Profit Sub-Fund

The business in this sub-fund comprises:

- (1) Long term sickness and accident business, namely the directly written permanent health business in respect of which the directors have determined that profits should accrue 100% to shareholders.
- (2) The linked business written directly by PAC, including linked business issued in France, in respect of which the directors have determined that profits should accrue 100% to shareholders.
- (3) The loan protection business transferred into PAC from SAL on 31 December 2002 and subsequently written directly by PAC, in respect of which the directors have determined that profits should accrue 100% to shareholders.
- (4) Defined Charge Participating business issued by PAC in France, and Defined Charge Participating business reassured into PAC by Prudential International Assurance plc (PIA) and Canada Life (Europe) Assurance Ltd, excluding the accumulated investment content of premiums paid, which is transferred to the DCPSF (see below).
- (5) Ex-SAL business, namely the with-profits, non-participating and linked business (including internal linked funds) transferred into PAC from SAL on 31 December 2002 and any new premiums arising on those products, excluding Prudential Protection business written between 1 January 2003 and 25 July 2004 and the accumulated with-profits premiums which are held in the WPSF (see 5 below).
- (6) Reassurance of the accumulated investment content of linked business written in Prudential (AN) Limited.

All profits in the NPSF accrue 100% to shareholders.

## Structure of the long term business (continued)

## 3. Scottish Amicable Insurance Fund

PAC acquired the business of Scottish Amicable Life Assurance Society (SALAS) on 1 October 1997. As a consequence a closed sub-fund SAIF and a memorandum account within the WPSF, the Scottish Amicable Account (SAA), were created. SAIF contains the pensions business, annuities and traditional with-profits life business transferred from SALAS and the accumulated investment content of with-profits business in SAA.

All profits in SAIF accrue to holders of with-profits contracts in SAIF and SAA.

The accumulated investment content of linked premiums is invested in the linked funds that were transferred from SAL to the NPSF on 31 December 2002.

The WPSF provides financial support to SAIF through a memorandum account, the Scottish Amicable Capital Fund (SACF), some of which may be drawn upon in adverse investment conditions to support the smoothing of bonuses within SAIF. No such drawings have yet been necessary. The WPSF receives an annual charge from SAIF for providing this financial support.

## 4. Defined Charge Participating Sub-Fund

This fund comprises the accumulated investment content of premiums paid in respect of the Defined Charge Participating with-profits business issued in France, and the Defined Charge Participating with-profits business reassured into PAC from Prudential International Assurance plc and Canada Life (Europe) Assurance Ltd. All profits in this fund accrue to policyholders in the DCPSF.

A bonus smoothing account is maintained in the WPSF (see below) so that whenever a claim payment is made from the DCPSF any excess of the claim amount over the policy's underlying asset share is transferred from the WPSF to the DCPSF and any shortfall is transferred from the DCPSF to the WPSF. On average, it is intended that these smoothing transfers should generate neither profit nor loss to either fund.

## 5. With-Profits Sub-Fund

The WPSF contains all other long term business, comprising:

- (1) With-profits, non-participating and linked business (other than the categories defined above) written directly by PAC. This includes the Prudential Protection business written between 1 January 2003 and 25 July 2004.
- (2) With-profits, non-participating and linked life business transferred to SAA from SALAS, excluding the accumulated investment content of with-profits premiums, which is held in SAIF, and also excluding the accumulated investment content of linked premiums, which is invested in the linked funds transferred from SAL to the NPSF on 31 December 2002.
- (3) The accumulated with-profits premiums in respect of business transferred into the NPSF from SAL on 31 December 2002 and any new premiums arising on those products.
- (4) Reassurance of accumulating with-profits business written in Prudential (AN) Limited.

Divisible profits from this business accrue to both shareholders and with-profits policyholders in the WPSF (other than with-profits policyholders in SAA who share in the profits of SAIF).

Transfers not exceeding 5% of divisible profits may be made to a common contingency fund. Not less than 90% of the remainder is allocated to the with-profits policyholders, and the balance to shareholders.

## Structure of the long term business (continued)

#### 6. Prudential UK Services Limited

As a result of the acquisition of SALAS a service company, Prudential UK Services Limited (formerly Craigforth Services Limited), was created to provide services to PAC and other companies within the Prudential Group.

Renewal expenses for all business transferred from SALAS are governed by the Insurance Services Agreement with Prudential UK Services Limited. This sets out a guaranteed fixed rate tariff (with annual inflation adjustments) applicable for ten years from the date of the Scheme of Transfer. Thereafter the charges revert to cost on a basis equivalent to that being charged for PAC's own business.

## 7. Reinsurance of linked business

Much of the linked business in PAC was transferred either from SALAS on 1 October 1997 or from SAL on 31 December 2002.

Most of the property-linked business issued by PAC is linked, via reinsurance treaties, to the internal linked funds of other life assurance companies.

#### 8. Reinsurance of pensions annuities in payment

Some annuities in payment originally written in SAL and transferred to the NPSF on 31 December 2002 are ceded to Prudential Retirement Income Limited. Most of the non-profit and index-linked annuities in payment issued by PAC are ceded to Prudential Annuities Limited, a wholly-owned subsidiary of the WPSF, or to Prudential Retirement Income Limited. Most of the non-profit annuities in payment written in SAIF are ceded to Prudential Retirement Income Limited.

#### VALUATION REPORT

#### 1. Introduction

- **1.(1)** The investigation relates to 31 December 2006.
- **1.(2)** The previous investigation related to 31 December 2005.
- **1.(3)** No interim valuations have been carried out for the purposes of IPRU(INS) 9.4 since 31 December 2005.

## 2. Product range

(a) New products

#### Flexible Protection Plan

The Flexible Protection Plan, launched on 10 July 2006, is a comprehensive non-profit protection policy which can provide a combination of life cover and/or serious illness cover as well as a range of rider benefits providing disability cover, income protection cover and waiver of premium.

It can be written on a single life or joint life basis. A plan account determines the amount of cover available to be paid when a claim occurs. In the event of a claim, the severity of the illness or disability determines whether the full amount of cover or a partial payment is made. The plan does not necessarily cease following a claim and multiple claims may be made. The plan does not acquire a surrender value.

For fixed term plans, there is a choice of reviewable or guaranteed premiums. Whole of life plans have reviewable premiums. Premium reviews take place on the tenth and each subsequent anniversary. Once a review changes the premium, the rate will be guaranteed for the following 10 years.

(b) Products withdrawn

No products were withdrawn during the year.

(c) New bonus series

No new bonus series have been introduced during the financial year.

(d) Changes to options or guarantees under existing products

On 14 August 2006, a SIPP option was added to the range of funds available under the Flexible Retirement Plan that was launched in 2005. In this fund the customer will be able to choose and manage the assets held. The fund is wholly reassured to and administered by Suffolk Life Annuities Limited, a specialist SIPP provider. There is no fund-related annual management charge. Instead, there is a set-up fee, an annual fee to cover general administration costs and explicit fees to cover investment and asset management activities. The fees can be increased in line with costs. Prudential provides no investment guarantees.

(e) With-profits sub-funds

The With-Profits Sub-Fund and the Defined Charge Participating Sub-Fund are both open to new with-profits business.

The Scottish Amicable Insurance Fund is closed to new business except by increment.

## 3. Discretionary charges and benefits

#### **3.(1)** Market value reduction

Market value reductions have been applied throughout 2006 except on corporate pensions business in the WPSF. The policy years of entry to which market value reductions were applied during 2006 are summarised below:

Product	Policy years of entry
SAIF	1985-1993, 1995 – 1997, 1999,
	2003, 2006
Prudence Bond	1994 - 2006
PSA/PIB	1998 – 2002, 2005
Personal Pensions	1988, 1989, 1991, 1993-1995,
	2005-2006

#### **3.(2)** Reviewable protection policies

There was no review of premium rates for reviewable protection policies in 2006.

## 3.(3) Non-profit deposit administration benefits

There are no non-profit deposit administration contracts.

## 3.(4) Service charges on linked policies

Policy/member fees increased by 2.66% in 2006 for those linked products where the fees increase in line with Retail Price Index (RPI) inflation, based on the increase in RPI from September 2004 to September 2005.

### 3.(5) Benefit charges on linked policies

There have been no changes to benefit charges on linked policies during the financial year.

#### 3.(6) Unit management charges and notional charges on accumulating with-profits policies

For accumulating with-profits business, changes to notional charges are shown in the table below:

	Reserves £m	New charge	Old charge
Prudence Bond – Pre Mk9 and Establishment Charge	8,243	1.188	1.065
new business and top ups to this business up to $30/09/02$			
Prudence Bond – Top ups to pre Mk7 and all	262	1.338	1.215
Establishment Charge options made after 30/09/02			
Prudence Bond – Mk9 new business and top ups to Mk7,	209	1.438	1.315
Mk8 and Mk9 after 30/09/02			
Prudence Bond – Pre NIC3 new business and top ups to	510	1.488	1.365
pre NIC up to 30/09/02			
Prudence Bond – NIC3 new business and top ups to	664	1.738	1.615
NIC1, NIC2 and NIC3 after 30/09/02			
Prospects Bond	46	2.138	2.015

The notional charges for Prudential Investment Bond (product codes 500 and 505), all UK pensions business, Hong Kong policies and DCPSF policies were unchanged.

## 3. Discretionary charges and benefits (continued)

## 3.(7) Unit pricing of internal linked funds

#### (a) <u>Hong Kong PruLink policies – Prudential Money Fund</u>

The unit issue price and redemption price are always 1.000. Interest is credited to policies in the form of additional units not less frequently than once a month. The rate to be credited is determined from the value of the fund assets, any surplus being distributed by issuing new units on a pro-rata basis.

## Hong Kong PruLink policies - all funds except the Prudential Money Fund

The funds are wholly invested in similarly named authorised Guernsey unit trusts managed by Prudential Fund Managers Guernsey. Units are allocated or cancelled on the next weekly valuation date at the prices determined by the unit trust manager. There is no bid/offer spread. PruLink policies provide that the fund unit prices may be varied from the corresponding unit trust price if a variation would be justified by, for example, a change in the basis of Hong Kong life office taxation.

#### Other business written and retained by PAC

The company operates its internal linked funds on a forward pricing basis. The daily unit prices used for the allocation of units to and deallocation of units from policies are calculated by a valuation of the internal linked funds. The valuation point of each fund is 12 noon. The allocation and deallocation of units is carried out once the unit prices are available. The unit prices for a fund are determined using either a creation price basis or a cancellation price basis, depending on the net cash flow position of the fund. Creation of asset units is carried out at the creation price, which is based on the purchase cost of the underlying assets plus any associated costs. Cancellation of asset units is carried out at the cancellation price, which is based on the sale value of the underlying assets of the fund less any associated costs.

## Other

The unit pricing methods for all other contracts are described in the regulatory returns of the companies with which the linked liabilities are wholly reassured.

- (b)Unit pricing bases are determined at fund level, so all policies invested in the same fund have the same basis applied.
- (c) The price used for collective investment schemes and similar assets is the latest valuation at midday; deals placed before mid-day receive that price.

#### 3.(8) Capital gains tax deductions from internal linked funds

Tax deductions are made on net realised gains as they arise, as well as for net unrealised gains on directly held assets. For holdings in collective investment schemes, allowance is made for the spreading over seven years of deemed disposals of net unrealised gains. Withdrawals from the fund for the payment of tax are made quarterly, the same frequency at which the company makes payments to the Inland Revenue.

Each unit fund is treated in principle as though it were a stand-alone taxable entity, so no credit is given for a net loss position, but no carry-back of losses is applied. Instead, credit is given for losses that would fall into the company's actual tax computation in a future year to the extent that they do not exceed the amount of deemed gains carried forward to that particular year. Net unrealised gains of directly held assets are not set off against any realised or deemed losses in the same fund, nor is credit given for net unrealised losses.

#### 3. Discretionary charges and benefits (continued)

Allowance is made in determining the tax charge and provision for the time delay until the assets are assumed to be sold (for unrealised gains and losses) and between the date of calculation of the provision and the tax payment being made.

The tax rates applied in 2006 were as shown in 3.(9) below.

#### 3.(9) Capital gains tax provisions for internal linked funds

#### Guaranteed Equity Bond

Liabilities are matched by a combination of bonds and derivatives which ensure that at maturity the gross amount payable less tax at 22% on the chargeable gain from the derivatives equals the guaranteed maturity benefit. Capital gains tax is allowed for in the valuation by including the gross value of the derivatives in the mathematical reserves.

#### Linked contracts in France and Hong Kong

The funds are not subject to capital gains tax.

#### Contracts with linked liabilities wholly reinsured

A full description of the capital gains tax provisions for these contracts can be found in the regulatory returns of the companies with which the linked liabilities are wholly reinsured.

#### Other business written by PAC - life business

As described in 3.(8) above, in determining the price of units in the internal linked funds relating to life business the value of assets is adjusted by a provision to reflect, on a fund by fund basis, the capital gains tax on indexed gains on the assets held within the funds. On certain funds some credit has been given in respect of chargeable losses. The provision for tax is calculated on a daily basis allowing for the movement in unrealised gains, after any indexation, and losses, using a tax rate reflecting the expected tax payable by the Company as these gains and losses are realised. For investments in non loan relationship unit trusts and OEICs, the tax rate used allows for the deemed disposal of the investments at the end of the year and the spreading of the tax payable over 7 years.

The mathematical reserves make allowance for the losses for which no credit is currently given that will be carried forward and offset against future gains or deemed disposals carried forward to future years.

The following percentages were deducted or provided for during the year:

	Realised gains/losses	Unrealised gains/losses
Equities and properties	20%	17% to 20%
Unit trusts and OEICS	20%	15% to 20%
Gilts and bonds	20%	20%

For policies linked directly to unit trusts, a terminal deduction from benefits payable to policyholders is made in respect of any past or potential liabilities to corporation tax on chargeable gains relating to the units allocated to the policy.

#### Other business written by PAC - pensions business

The funds are not subject to capital gains tax.

#### 3. Discretionary charges and benefits (continued)

#### 3.(10) Discounts and commission on buying and selling units

#### Linked contracts in France

The company receives rebate commission of 0.6% per annum of funds under management from the Réactif and Carmignac external unit-linked funds. Corresponding rebate commission of 0.4% and 0.3% respectively is payable to distributing agents. Policyholders do not benefit from this rebate.

## Linked contracts in Hong Kong

No special terms apply when units are purchased from the unit trust manager.

#### Business written by PAC

For investment in unit trusts and OEICs the Company receives a discount equal to the managers' initial charge. The internal linked funds also benefit from the rebate of the annual management charge. All of the benefits of annual management charge rebates are passed on to policyholders.

#### Other

The unit pricing methods for all other contracts are described in the regulatory returns of the companies with which the linked liabilities are wholly reassured.

## 4. Valuation methods and bases (other than for special reserves)

## 4.(1) Valuation methods

Unless specified to the contrary in 4.(1).6 on page 13, the following valuation methods apply.

- **4.(1).1** The mathematical reserve for assurances and annuities reported in Form 51 is the difference between the present value of the benefits and the present value of the future valuation net premiums (a net premium valuation (NPV) method), both calculated with provision for immediate payment of claims. Policies where negative reserves could arise have been valued individually and the mathematical reserves increased to zero so that no policy is treated as an asset. Otherwise, contracts with a common attained age and number of years to run to maturity or premium cessation are grouped together.
- **4.(1).2** The mathematical reserve for accumulating with-profits business in SAIF and SAA, and for accumulating with-profits business previously written in SAL and in respect of new business on those products, is taken as the lower of:
  - (a) the value at the bid price, excluding terminal bonus, of the notional number of units allocated to policyholders, and
  - (b) the surrender or transfer value which, having regard to the duty to treat customers fairly, would be payable at the valuation date,

or, if greater, the value of the guaranteed liabilities, excluding final bonus, calculated on a gross premium bonus reserve method making no allowance for future annual bonus interest.

A further non-unit reserve is held in respect of mortality or morbidity, as appropriate, and expenses (including investment management expenses and other outgo associated with payments to third parties).

The comparison of the value of units allocated, the surrender or transfer value and the bonus reserve liability is carried out on a policy-by-policy basis.

For contracts where actuarial funding is used, the value of the units is net of the present value of future annual establishment charges, recurrent management charges or additional management charges that are used to recoup initial expenses.

The surrender or transfer value is taken as the accumulated fund, including final bonus and less a market value reduction where appropriate, at the valuation date, less any explicit charge that would apply on immediate surrender.

The non-unit reserves are adequate, on the valuation basis, to eliminate any future negative cash flows which would otherwise arise.

Section 32 Buy Out contracts include a specific provision for the Guaranteed Minimum Pension.

- 4.(1).3 The mathematical reserve for all other accumulating with-profits business is the lower of:
  - (a) the accumulated fund or the value at the bid price of the notional number of units allocated to policyholders, in both cases excluding final bonus, and
  - (b) the surrender or transfer value which, having regard to the duty to treat customers fairly, would be payable at the valuation date,

or, if greater, the value of the guaranteed liabilities, excluding final bonus, calculated on a gross premium bonus reserve method making no allowance for future annual bonus interest.

The comparison of the accumulated fund or value of units allocated, the surrender or transfer value and the bonus reserve liability is carried out on a policy-by-policy basis.

For contracts where initial expenses are recouped by an annual cancellation of units allocated in the first year, the number of units valued is reduced appropriately. In cases where a higher benefit would be payable on early death, due allowance has been made.

The surrender or transfer value is taken as the accumulated fund, including final bonus and less a market value reduction where appropriate, at the valuation date, less any explicit charge that would apply on immediate surrender.

**4.(1).4**The mathematical reserve for property-linked contracts is the unit liability together with a non-unit liability (a "sterling reserve") to cover expenses, mortality, morbidity, options and guarantees and, where appropriate, capital gains tax.

The unit liability is based on the value at the date of valuation of the units allocated to policyholders. For contracts where actuarial funding is used, the value of the units is net of the present value of future annual establishment charges, recurrent management charges or additional management charges that are used to recoup initial expenses.

A non-unit liability for mortality and expenses is determined for each policy using a discounted cash flow method. For property-linked contracts in the NPSF the non-unit liability provides only for attributable expenses and an additional reserve for non-attributable expenses is calculated at a homogeneous risk group level as described in section 6.(6) on page 27. The total non-unit liability is adequate on the valuation basis to ensure that any future negative cash flows which would otherwise arise are eliminated, including ensuring that the reserve for an individual policy both currently and at any future date is at least equal to the surrender value. Provision is also made for tax on capital gains, for outstanding premiums and, where relevant, for premiums received in respect of policies not yet accepted.

**4.(1).5** The mathematical reserve for RPI-linked annuities is determined without an explicit allowance for future increases in annuity payments. This is consistent with the treatment of the matching assets.

#### **4.(1).6** Exceptions to the above:

Mathematical reserves for with-profits whole life assurances issued by the Company before 1978 are calculated on the assumption that each policy is converted on its next anniversary to an endowment assurance maturing after ten years, this being the most onerous option.

Specific provision is made for guaranteed early maturity options under Flexidowment and certain other miscellaneous assurances and deferred annuities in SAIF, and for early maturity options and annuity options under Flexipension (Series 1) contracts, by valuing them at the earliest maturity option date and holding additional reserves for maturity options thereafter.

Specific provision is made for guaranteed cash options under pension assurance and pure endowment contracts in SAIF by valuing the greater of the cash option and the present value of the annuity benefit.

Prudential Protection policies sold from 1 August 2000 are valued using a gross premium valuation method allowing for the repayment of financing from Swiss Re Life and Health Limited (where applicable). For policies written in the NPSF, prudent lapse assumptions are allowed for in reserve calculations. Policies are valued individually and any negative mathematical reserves increased to zero so that no policy is treated as an asset.

Mortgage Protection (Home Protect) and Flexible Protection Plan policies are valued by a gross premium valuation method with no allowance for lapses. Any negative mathematical reserves are increased to zero.

Individual permanent health insurances are valued using the claims inception and disability annuity (CIDA) gross premium method.

The mathematical reserve for some individual deferred annuities is the accumulation of the premiums paid at the greater of a rate of interest guaranteed at the date of issue and a concessionary rate of interest declared for each year. The concessionary rates are the interest rates used in determining the benefits payable.

For single premium loan protection policies the reserve is the sum of the unearned premium reserve, any accrued profit commission and reserves for claims incurred but not reported and claims in payment. The unearned premium is net of initial commission but gross of all other loadings for expenses and profit. The reserve for regular premium loan protection policies is taken as three times the monthly premium. For the life element of loan protection business, a reserve is held to provide for the reduction of future tax relief on commission where premiums would be rebated based on prudent assumptions for future policy lapses. A check is carried out to assess whether the unearned premium reserve will be sufficient given claims experience to date and, if necessary, a further unexpired risk reserve is held.

For linked life annuities transferred from M&G Pensions, the reserve is taken as the number of units payable per annum multiplied by an annuity factor and by the valuation unit price.

#### 4.(2) Valuation interest rates

Valuation interest rates are reported in the tables in Appendix 1 on page 39.

#### 4.(3) Risk-adjustments to yields

#### 4.(3).1 Fixed interest securities

Yields have been adjusted to allow for the potential default on fixed interest securities (other than approved securities assessed as risk-free by the firm's investment manager).

The default allowance is determined from data supplied by the firm's investment manager, which itself is based upon research carried out by one of the major rating agencies. This analysis, based on actual default experience over a 35-year period, produces mean default rates according to credit quality and term to redemption.

In the event of default it may be possible to recover some capital, especially if the loan is secured. The allowance for recovery (or partial recovery) of the loan varies according to the level of security and the following recovery rates are assumed:

0/\_

	/0
First Mortgage Debenture/Senior Secured	75
Senior Unsecured	45
Subordinated Debt	20

To calculate the overall default provision, the corporate bond portfolio is broken down according to credit rating and level of security. The default rate for each category is assumed to vary between 100% and 200% of the appropriate mean default rate, reduced by the expected recovery, plus a further amount for credit risk.

Term to	Seniority	AAA	AA	Α	BBB	BB	В
Redemption							and
							lower
	Senior Secured	8	8	11	24	136	276
0 to 10 years	Senior Unsecured	18	18	25	54	300	607
	Subordinated	27	27	36	79	437	883
	Senior Secured	6	6	10	28	97	196
10 to 20 years	Senior Unsecured	14	14	22	62	214	433
	Subordinated	20	20	32	91	311	629
	Senior Secured	5	8	15	30	97	196
20 to 30 years	Senior Unsecured	13	19	34	66	214	433
	Subordinated	18	28	50	97	311	629
	Senior Secured	5	10	17	30	97	196
Over 30 years	Senior Unsecured	12	22	39	66	214	433
	Subordinated	18	32	56	97	311	629

The derived credit risk adjustments for each category in basis points per annum are set out below:

Regard is also paid to the yield differential between corporate and government bonds, and to prevailing economic circumstances.

Aggregate yields on the backing assets have been adjusted by the rates shown in the table below to allow for potential credit risk within the fixed and variable interest bond portfolios. These credit risk adjustments include margins for prudence.

Sub-Fund	Fixed/Variable	Credit risk adjustment (in basis points)
	Interest	
With-Profits Sub-Fund	Fixed	75
	Variable	70
SAIF	Fixed	59
	Variable	68
Defined Charge Participating Sub-Fund	Fixed	Between 36 and 51 (depending on fund)
	Variable	65
Non-Profit Sub-Fund	Fixed	Between 31 and 34 (depending on fund)
	Variable	31

The overall adjustments to yields for risk are restricted so that the risk-adjusted yields are non-negative.

## 4.(3).2 Property

Yields on individual properties were subjected to a cap equal to the risk-adjusted yield on the Merrill Lynch over 10 years corporate bond index. The risk adjustment was calculated by applying the methodology described above to the constituents of the index.

## 4.(3).3 UK equities

Yields on individual equities were subjected to a cap equal to 90% of the yield on the Merrill Lynch over 10 years corporate bond index less the assumed default rate.

#### 4.(3).4 Overseas equities

Yields on individual equities were subjected to the same cap used for property.

#### 4.(4) Mortality rates

Mortality rates are reported in the tables in Appendix 2 on pages 40 to 41.

Specimen expectations of life for deferred and immediate annuities are shown in the table in Appendix 3 on page 43.

#### 4.(5) Morbidity rates

Morbidity rates are shown in Appendix 4 on pages 44 to 46.

#### 4.(6) Valuation expense bases

Expense assumptions except for the DCPSF are shown in Appendix 5 on pages 47 to 49. Expenses for UK life products are assumed to attract tax relief at 20%.

A third party administers business in the DCPSF and the renewal expenses allowed for in the valuation are based on the actual tariff in the service agreement.

## 4.(7) Unit growth and inflation rates

4(7)1	Unit growth rates for link	ed husiness before m	nanagement charges (	(net of tax for UK life business)
<b>T</b> •( / )•1	Onit growth rates for this	cu dusiness deroite in	lanagement enarges (	ince of tax for OK file busiless)

	31 December 2006	31 December 2005
	%	%
UK – Life	4.20	4.00
UK – Pensions	5.25	5.00
Overseas – Hong Kong	6.84	6.90
Overseas – other	4.50	5.00

## 4.(7).2 Expense inflation assumptions and future increases in policy charges

	31 December 2006	31 December 2005
	% per annum	% per annum
UK	3.75	3.50
Overseas – Hong Kong	2.25	2.25
Overseas – other	3.75	3.50

## 4.(8) Future bonus rates

The gross premium method is not used to value conventional with-profits business.

For unitised with-profits business the future annual bonus rates are assumed to be the higher of zero and any guaranteed rate.

## 4.(9) Lapse, surrender and paid-up assumptions

Prudent discontinuance assumptions are used only in the NPSF and only for some UK protection assurances on Form 51 and UK linked assurances and pensions on Form 53. We have considered only business in the NPSF to determine whether one product constitutes more than 50% of the business in force or whether to estimate a weighted average for several products.

Product		Average	lapse / sur	ender / pai licy years	d-up rate
		1 - 5	6 - 10	11 - 15	16 - 20
		%	%	%	10 - 20 %
Level term	lapse	11.00	8.50	4.00	4.00
Decreasing term	lapse	11.00	8.50	4.00	4.00
Accelerated critical illness	lapse	11.00	8.50	4.00	4.00
Income protection	lapse	11.00	8.50	4.00	4.00
UL savings endowment	surrender	5.20	5.25	5.00	5.00
UL target cash endowment	surrender	19.20	9.10	4.40	4.40
UL bond	surrender	3.28	10.24	6.80	6.80
UL bond	automatic withdrawals	100	0% of curre	ent experie	nce
UL individual pension regular premium	PUP	19.20	4.80	4.80	4.80
UL individual pension regular premium	surrender	2.40	2.40	2.40	2.40
UL group pension regular premium	PUP	12.80	9.60	9.60	9.60
UL group pension regular premium	surrender	2.00	2.00	2.00	2.00
UL individual pension single premium	surrender	7.00	3.20	3.20	3.20

#### **4.(10)** Other material assumptions

There were no other material assumptions not stated elsewhere.

#### 4.(11) Derivatives

In determining the long-term liabilities, allowance has been made for derivative contracts and contracts or assets having the effect of derivative contracts, by adjusting the existing assets attributed to the long-term business to reflect the underlying investment exposure.

SAIF and WPSF hold US dollar/sterling and euro/sterling currency forwards in connection with fixed interest securities denominated in US dollars and euros respectively. Taken in aggregate these combinations of currency forwards and fixed interest securities could be considered to be sterling assets and, as such, the yields should be comparable with sterling yields. To achieve this, the yields on the US dollar and/or euro assets are reduced if the US dollar risk-free yield curve or the euro risk-free yield curve respectively exceeds the sterling risk-free yield curve.

#### 4.(12) Effect of change in methodology

The effect on the mathematical reserves of the changes in valuation methodology arising from changes in INSPRU valuation rules effective from 31 December 2006 is:

	£m
Allowance for lapses on valuation of protection business	6
Allowance for negative reserves on valuation of protection business	-
Allowance for lapses and attributable expenses on valuation of unit-	
linked business	88

The changes in valuation methodology were adopted only in the NPSF.

## 5. **Options and guarantees**

## 5.(1) Guaranteed annuity rate options

(a) The mathematical reserves for guaranteed annuity options are calculated assuming a 100% take-up of available options, and are determined as follows:

#### Group cash accumulation contracts

For valuation purposes, it is assumed, in line with current practice, that if the guaranteed rates are higher than current rates on the valuation date, the guarantee will be revised with 6 months' notice from the next scheme renewal date. As a result, it is assumed that retirements for at most a further 18 months will be subject to the guarantee prior to its amendment. Any additional amount of annuity payable as a result of the guarantee is calculated assuming that the recent profile of retirements (age, sex and purchase money) continues. The resulting annuity is valued on the basis used for non-profit group deferred annuities.

#### EPP Mark 1

The fund in respect of the first 5 years' premiums for each scheme is calculated. The additional amount of annuity payable as a result of the guarantee is then calculated by age groups assuming that the recent profile of retirements by age and sex continues (all assumed to be at an age at which a guarantee applies). The distribution of long-term interest rates at retirement was provided by the economic scenario generator used to derive market-consistent returns for use in the Peak 2 valuation and a zero valuation interest rate was assumed in deferment.

## SAIF products

- Flexipension (Series 1 and Series 2)
- Series 1 and Series 2 pension contracts written up to and including 26 July 2000 as increments to Flexipension (Series 1) contracts
- Individual Endowment/Pure Endowment Series 1 and Series 2
- Individual Pension Account

For accumulating with-profits and linked business, an additional reserve is calculated by rolling up the existing unit reserve with future premiums to the selected retirement date, and calculating the present value of the annuity guarantee over the projected fund value. The value of the annuity guarantee at retirement is calculated assuming a mortality basis in possession of 71% PMA92/67% PFA92 (c=2004) and a valuation interest rate of 3.5% p.a. in possession. For linked business, the projected fund is calculated assuming a fund growth rate of 7.125% (i.e. 8.0% less an annual management charge). The excess of the annuity guarantee over the projected fund value is discounted at 4.5% per annum. For accumulating with-profits business, no future bonus is allowed for. The projected fund is calculated assuming a fund growth rate of 4.0% (representing the 4.0% guarantee on SAIF pension policies). The present value of the excess of the annuity guarantee over the projected fund value is discount rate of 3.35%.

For conventional business, the benefit included in the net premium reserve is the greater of the cash benefit and the value of the annuity guarantee. The mortality basis in deferment is AM92/AF92 + 1 for individual endowment/pure endowment and AM92/AF92 - 4 for Flexipension (Series 1), and in possession is 71% PMA92/ 67% PFA92 (c=2004). The valuation interest rate in deferment is reduced by 0.4% to allow for mortality improvement in deferment. The valuation interest rate (before the 0.4% reduction for mortality improvement) is 4.5% in deferment and 3.5% in possession.

For the purpose of determining the valuation interest rate, swaptions held were assumed to be nonyielding.

The adequacy of the reserve has been verified using stochastic modelling.

An additional expense reserve of £90.8m is held to meet the cost of administering the future annuities in payment under the guaranteed annuity options in SAIF.

(b) See the table on the following page.

## Table 5.(1)(b) – Guaranteed annuity rate options

Product name	Basic reserve	Spread of	Guarantee	Guaranteed	Are	Form of the annuity	Retirement
	£m	outstanding durations	reserve £m	annuity rate % for a male aged 65	increments permitted?		ages
WPSF							
Group cash accumulation	578	0 – 18 months	0	6.22	No	Single life, monthly in advance, guaranteed for 5 years	50 - 70
Executive Pension Plan Mark 1	174	0 – 35 yrs	47	10.29	Yes – in first 5 yrs of scheme	Single life, monthly in advance, without guarantee	60 – 70 (M) 55 – 70 (F)
SAIF							
Flexipension	914	0 – 40 yrs; average 10 yrs	521	11.30	No	Single life, yearly in arrears, without guarantee	60 - 75
Individual Endowment/Pure Endowment	231	0 – 40 yrs; average 10 yrs	105	10.00	No	Single life, monthly in advance, guaranteed for 5 years	60 – 70 (M) 55 – 70 (F)
Individual Pension Account	108	0 – 40 yrs; average 10 yrs	52	10.00	No	Single life, monthly in advance, guaranteed for 5 years	60 – 70 (M) 55 – 70 (F)

If the form of annuity taken is different to that shown in the table, by concession an actuarially equivalent rate is given.

#### 5.(2) Guaranteed surrender values and guaranteed unit-linked maturity values

**5.(2).1** There are no guaranteed unit-linked maturity values. The methods and bases used for guaranteed surrender values were as follows.

#### PruFund Investment Plan

This is a single premium whole-life accumulating with-profits contract written in the WPSF.

At the 5<sup>th</sup> anniversary of a premium payment, the smoothed fund value is increased by the value of additional units credited, if necessary, to give a total value equal to the guaranteed fund minimum fund value (the initial premium adjusted for withdrawals). Policies sold up to 31 July 2005 received this guarantee for no extra cost. After that date, policyholders choosing the guarantee pay an additional annual management charge for 5 years.

The reserve for the guarantee was set using the Black-Scholes option pricing formula and is 6% of the current fund value.

#### Prudential Europe Vie

This is a single premium whole-life accumulating with-profits contract denominated in euros and written as overseas life assurance business in the DCPSF.

The surrender value at any time is guaranteed to be no less than 75% of the initial investment, net of the initial charge, after allowing for any partial surrender and withdrawals made.

As at 31 December 2006, the basic policy reserves exceeded the minimum guaranteed surrender values to the extent that no additional reserve was considered necessary.

#### Hong Kong

Some products issued in Hong Kong have guaranteed surrender values based on a net premium valuation on specified bases. The valuation reserve is tested against the guarantee basis on a policy-by-policy basis and no additional reserve is required.

# 5.(2).2 Guaranteed surrender values and unit-linked maturity values

Product name	Basic reserve £m	Spread of outstanding durations	Guarantee reserve £m	Guaranteed amount £m	MVA free conditions	In force premiums £m	Are increments permitted?
WPSF							
PruFund Investment Plan	130	2.75 – 5 yrs	7	Fund increased to initial premium (adjusted for withdrawals) after 5 years	N/A	110	No
<u>DCPSF</u>				withdrawais) after 5 years			
Prudential Europe Vie	87	Whole-Life	0	51	Regular withdrawals up to 5% per annum	78	Yes
Hong Kong					ar the rest of the second s		
Better Life	941	Whole-Life	0	417	N/A	126	No
Better Life Assurance II	33	Whole-Life	0	0	N/A	26	No
With Profit Endowment – 1 <sup>st</sup>	122	0 - 60 yrs;	0	86	N/A	5	No
& 2 <sup>nd</sup> Series		average 18 yrs					
With Profit Whole Life – 1 <sup>st</sup>	53	Whole-Life	0	42	N/A	3	No
& 2 <sup>nd</sup> Series							
PruFlexLife	21	Whole-Life	0	10	N/A	20	No
PRUsave Plus	141	0 - 20 yrs;	0	9	N/A	47	No
		average 10 yrs					

#### 5.(3) Guaranteed insurability options

**5.(3).1** There are a number of insurability options for which no additional reserve is considered necessary due to margins in the valuation mortality/morbidity bases. These options are:

#### Amicable Savings Plan

Extension Option allows the term of the plan to be extended by a period of at least ten years from the original maturity date.

#### Home Purchaser

Mortgage Alteration Option provides a limited facility, subject to conditions, to increase the life cover at ordinary rates of premium for the amount of any increase to the loan. If the term of the loan is also increasing, the term of the existing plan may also be extended to match the maturity date of the new plan.

Maximum Investment Plan and Flexible Investment Plan (ex M&G Life)

Maximum Investment Plans have an option at maturity to extend the term for a further ten years or to convert to a whole life assurance with a nominal premium. Flexible Investment Plans have an option to extend the premium paying term.

#### Investment Mortgage Plan (Ex M&G Life)

There is an option to increase the sum assured without medical evidence if the policyholder increases his or her mortgage.

#### Personal Security Plan (Ex M&G Life)

Most policies have an option to increase the benefits each year in line with the Retail Prices Index without medical evidence either to age 65 or throughout life. Benefits other than Keyman Disability Benefit may also be increased by up to 20% without medical evidence on marriage, house purchase or birth of children. On some policies the death benefit can be increased without medical evidence following changes in Inheritance Tax legislation. If any of these options is exercised the Company recommends an appropriate increase in premium.

Prudential Protection policies issued at ordinary rates include an option to increase cover without evidence of health in the event of mortgage increase, marriage, childbirth or adoption. The option can be exercised only before the life assured's 50<sup>th</sup> birthday and within 3 months of the event occurring.

Some UK policies issued between September 1975 and April 1984 and some policies issued in Hong Kong contain an option, in return for an additional premium, to effect further assurances without evidence of health.

Some assurance policies contain options to effect further assurances without evidence of health at specific ages, on marriage or on the adoption or birth of a child. Under some assurances in Hong Kong, a guaranteed insurability option of up to five times the basic sum assured is offered at the maturity of the pure endowment part of the assurance.

Some assurance policies issued between October 1973 and July 1979 on the life of a parent or guardian for the benefit of a child contain an option to permit the child, after attaining a specified age, to effect a whole life or endowment assurance without evidence of health for a sum assured not exceeding four times that of the original policy. On the marriage of a female child, the option may be exercised on her husband's life if he is under age 45.

Some individual level temporary assurance policies contain an option, in return for an additional premium, to convert wholly or partially to a whole life or endowment assurance for a sum assured not exceeding the original sum assured.

Some individual temporary assurance policies contain an option to renew the assurance every 5 or 10 years without evidence of health subject to a maximum age at renewal of 55 (65 in Hong Kong). The sum assured under this option can be increased by up to one half of the sum assured remaining at the end of the 5 or 10 year period. There is also an alternative option to convert at the end of the term to any other ordinary branch single life assurance, for a sum assured of up to 150% of that under the temporary assurance policy.

Under a few group life assurance policies, premium rates are guaranteed for employees in respect of current levels of sum assured. Group life assurance premium rates are generally guaranteed for 2 or 3 years.

Employees leaving group pension schemes, where it has not been possible to remove the option, may replace any temporary life assurance cover with an individual assurance at the relevant rates of premium then in force, based on the original underwriting decision. The continuation option was withdrawn for new schemes during 1988.

On payment of an additional premium, individual permanent health insurance policies issued in the United Kingdom between January 1982 and July 1988 carry an option to increase the original benefit by up to 25% (subject to the total benefit being no greater than 75% of earnings) on every fifth policy anniversary without medical evidence. This option cannot be exercised whilst incapacitated or within 10 years of the termination date of the policy.

#### Prufund: Protection Plan

If the original policy was issued on normal terms, a new policy may be effected without evidence of health every 5 years before the attainment of age 50 for a sum assured of up to 50% of the sum assured under the original policy at the time each option is exercised. The option lapses if it is not exercised in whole or part. The new policy may be a with-profits whole life or endowment assurance.

#### Prufund: Savings Plan

At the end of the premium payment term, premiums may be continued for a further 10 years. Under Series 1 plans there is also an option after 10 years to continue the policy for a further 10 years without further payment of premiums.

#### Permanent Health Insurance

On payment of an additional premium, individual permanent health insurance policies issued in the United Kingdom between January 1982 and July 1988 carry an option to increase the original benefit by up to 25% (subject to the total benefit being no greater than 75% of earnings) on every fifth policy anniversary without medical evidence. This option cannot be exercised whilst incapacitated or within 10 years of the termination date of the policy.

#### Series A & Premier Pensions plans with Waiver Benefit or Comprehensive Waiver Benefit

Long Term Care Double Cover benefit entitles the plan holder to buy a Long Term Care Bond from Prudential International (or another contract approved by the PAC Actuary as a reasonable equivalent) at ordinary rates at retirement. Personal Pension and Group Personal Pension Plan holders with Waiver Benefit may increase the contributions covered by the benefit with no additional underwriting provided the increased contribution is no more than twice the previous contribution.

#### Mortgage Protection (Home Protect)

Policies issued at ordinary rates may include an option to increase cover without evidence of health in the event of mortgage increase, marriage, childbirth or adoption. The option can be exercised only before the life assured's 50th birthday and within 3 months of the event occurring. The increase can be up to 50% of the benefit for the mortgage option or 25% for the other options both subject to maxima of £150,000 (life and critical illness) or £1,000 a month (premium waiver and mortgage payment benefits).

#### Mortgage Protection (Ex M&G Life)

There are options for each life to continue cover for a further 5 years up to a date specified at the outset of the original cover, and, if the life assured increases his mortgage, to increase the benefit by the lower of 50% of the increase or £50,000 on rates in force at the time. Neither option requires medical evidence. Two schemes incorporate options for each life to add Critical Illness, Waiver of Contribution and PHI benefits. These options are offered subject to provision of satisfactory medical evidence.

**5.(3).1** There are no conversion or renewal options where the total sum assured exceeds  $\pounds 1$  bn.

## 5.(4) Other guarantees and options

#### 5.(4).1 FSA personal pensions review

The mathematical reserve for guarantees issued under the FSA personal pensions review is calculated by valuing the pension scheme benefits to which the policyholder would otherwise have been entitled and subtracting the value of the personal pension policy. Where relevant, each policyholder is assumed to be in a scheme providing an RPI-linked pension of two thirds of final earnings after 40 years' service with a 50% continuation to a surviving spouse and equivalent death-in-service benefits.

Stochastic modelling is used to calculate the reserves for these guarantees. The distributions of investment returns over the remaining period to retirement and long-term interest rates at retirement were provided by the economic scenario generator used to derive market-consistent returns for use in the Peak 2 valuation. In deferment, allowance is made where appropriate for salaries to increase by 2.0% per annum in excess of RPI and by a further 1% per annum up to age 50.

The basic policy reserve held at 31 December 2006 was £369m and the guarantee reserve was £484m.

## 5.(4).2 Guaranteed Minimum Pensions (GMPs) under Section 32 contracts

Under early versions of Section 32 contracts, some or all of the GMP was secured by a non-profit deferred annuity. Those benefits are valued using the methodology described in paragraph 4.(1).1 (page 11). Any remaining GMP was covered by the excess premium not required to purchase the non-profit deferred annuity and this was invested in a cash accumulation or with-profits fund.

Under later versions of Section 32 contracts, the whole of the GMP was covered by the with-profits fund.

The reserves for that part of the GMP covered by with-profits have been calculated using stochastic modelling. The distributions of investment returns over the remaining period to retirement and long-term interest rates at retirement were provided by the economic scenario generator used to derive market-consistent returns for use in the Peak 2 valuation.

The guarantee reserve for a small number of accumulating with-profits contracts (ex-SAL) was calculated by a deterministic method, being the excess value on a policy-by-policy basis of the GMP liability (allowing for revaluation) over the basic policy reserve. The GMP liability is valued at a discount rate of 4%, with future increases in National Average Earnings assumed to be at 5% per annum.

The total basic reserve for Section 32 contracts is £308m and the guarantee reserve was £274m.

#### 5.(4).3 PLCE100 - Mortgage endowments

PLCE100, a conventional with-profits low cost endowment assurance written in the WPSF, was designed to repay a mortgage if annual bonuses continued at the rate current at the date of issue. The policies included a provision that if the declared bonus rate were to fall, causing the projected claim value to fall, then the sum assured and premium would be increased accordingly. The Company has guaranteed that, once the premium has been increased to twice its initial level, and provided that the policy has not been assigned absolutely to a third party, then the maturity value will not be less than the mortgage the policy was intended to cover.

The guarantee reserve is determined by projecting current benefits to maturity assuming 4% growth and discounting any shortfall against the mortgage amount at 3%. If policies are not at their maximum premium level, allowance is made for the present value of additional premiums that could be payable up to twice the initial level.

The basic reserve for these policies is £28m and the guarantee reserve is £0.5m.

## 5.(4).4 Home Purchaser (Second Series)

Home Purchaser (Second Series) is a mortgage endowment product written in SAIF, for which the company has undertaken to guarantee that the maturity value will be no less than the original target amount if the experienced investment growth rate is greater than or equal to the growth rate assumption selected by the investor at outset.

The guarantee reserve is calculated based on a sample of policies by projecting policy benefits to maturity and discounting any shortfall against the mortgage amount at a valuation rate of 3%. The projections to maturity had regard to the distributions of investment returns over an assumed average outstanding term obtained from the economic scenario generator used to derive market-consistent returns for use in the Peak 2 valuation. Prudent allowance was made for an immediate rise/fall in policy values.

The basic reserve for these policies is £557m and the guarantee reserve is £8m.

## 6. Expense reserves

**6.(1)** Expense loadings of £691 million, grossed up for tax, are expected to arise during the 12 months from the valuation date. This comprises £291 million of explicit and £400 million of implicit loadings.

The following table shows a breakdown of the expense loadings by homogeneous risk group where some expenses are treated as non-attributable and total expense loadings for products where all expenses are treated as attributable.

Homogeneous risk group	Implicit allowances	Explicit allowance (investment)	Explicit allowance (other)	Non- attributable expenses	Total
	£m	£m	£m	£m	£m
Individual unit-linked life single premium business	0.0	5.8	1.8	3.5	11.1
Individual unit-linked life regular premium business	0.0	1.3	0.7	1.7	3.7
Individual unit-linked pensions single premium business	0.0	2.5	0.7	1.3	4.5
Group unit-linked pensions single premium business	0.0	0.6	0.2	0.2	1.0
Individual unit-linked pensions regular premium business	0.0	2.5	1.5	2.4	6.4
Group unit-linked pensions regular premium business	0.0	1.3	0.7	1.1	3.1
Stakeholder	0.0	1.0	2.2	3.6	6.8
All expenses attributable	399.5	33.7	220.9	n/a	654.1
Total	399.5	48.7	228.7	13.8	690.7

## 6. Expense reserves (continued)

- **6.(2)** Implicit allowances are calculated as follows:
  - For contracts valued using the net premium method, 90% of the excess of office over net premiums for ordinary branch with-profits contracts and 100% of the excess for industrial branch with-profits contracts.
  - A margin between the risk-adjusted yields on assets in the WPSF and DCPSF (0.13%) and the NPSF (0.07% for annuities in payment, 0.1% otherwise) and that required to support the valuation interest rates to cover fund management expenses.
  - A margin in property yields to cover maintenance costs and leases.
- **6.(3)** Maintenance expenses shown at line 14 of Form 43 are £650 million. This does not include renewal commission.
- 6.(4) A new business expense overrun reserve of £30 million is held in the NPSF. The reserve is calculated on a prudent basis as the excess, if any, of the present value of expenses and commission expected to arise in respect of business written in the 12 months following the valuation date over the present value of the charges available to cover such expenses.
- **6.(5)** In the first instance, expense reserves are calculated on the assumption that Prudential's UK insurance operations will continue to write new business indefinitely and hence that there will be no loss of economies of scale.

For business valued by the net premium method, under which there is no explicit allowance for expenses, the need for a maintenance expense overrun reserve is tested by comparing the present value of the allowances described in sub-paragraph (2) above with the present value of the expenses and commission expected to be incurred over the remaining lifetime of the business. The calculation of the value of future expenses allows for inflation of 3.75% p.a. An additional reserve is held if the present value of expenses and commission exceeds the present value of the expense allowances. At 31 December 2006 a reserve of £147 million is held in the WPSF and £67 million in SAIF.

For all other business, the expense loadings over the remaining lifetime of the contracts in force at the valuation date are included in the reserves reported in Forms 50.

In order to allow for the possibility that the firm will cease to transact new business twelve months after the valuation date, all expense provisions are recalculated on the assumption that, over a two year period, unit costs would be reduced by 25% (except in SAIF, where no reductions are assumed) and that thereafter the loss of economies of scale would result in overall expenses being cut more slowly than the rate at which policies run off. In addition the costs associated with closing to new business, such as redundancy payments and the costs of terminating management agreements, are estimated. If the sum of the closed fund expense reserves and termination costs exceed the open fund expense reserve, then the excess is held as an additional reserve, to the extent that this excess cannot be offset by projected surplus on prudent assumptions from existing business. At 31 December 2006, an additional reserve of £166 million is held in the WPSF, £30 million in SAIF and £5 million in the NPSF.

## 6. Expense reserves (continued)

**6.(6)** An additional reserve of £17 million is held in the NPSF to cover the non-attributable expenses. The additional reserve for each homogeneous risk group is calculated as the present value of all future expenses less charges, subject to a maximum of the non-attributable expenses, for the policies in that homogeneous risk group. All future charges and expenses are projected allowing for lapses on a prudent basis. Any future valuation strain is removed at the homogeneous risk group level.

Homogeneous risk group	Additional reserve
	£m
Individual unit-linked life single premium business	0.0
Individual unit-linked life regular premium business	3.0
Individual unit-linked pensions single premium business	0.0
Group unit-linked pensions single premium business	0.0
Individual unit-linked pensions regular premium business	0.9
Group unit-linked pensions regular premium business	0.0
Stakeholder	13.4
Total	17.3

The following table shows the reserve for each homogeneous risk group.

## 7. Mismatching reserves

7.(1) and (2) No deposits were received from reinsurers in 2006.

An analysis of the mathematical reserves (other than liabilities for property-linked benefits) and backing assets by currency is as follows:

Currency of	Mathematical reserves	% of	Value of backing assets in currency:				
liability	(excl. property-linked) in £m	reserves	£	US\$	Euro	Total	
£	60,066	94.3	60,066	0	0	60,066	
US\$	2,025	3.2	0	2,025	0	2,025	
Euro	701	1.1	0	0	701	701	
Other	911	1.4					
Total	63,703	100.0					

99.1% of the reserves shown as "Other" currencies are in Hong Kong dollars and are backed by assets in that currency. The balance is in Maltese currency in which no assets are held.

- 7.(3) No reserve is held for currency mismatching.
- 7.(4) to (6) Not applicable for a realistic firm.
- 7.(7) The NPSF held a reserve of £13.7m in respect of the test for cashflow mismatching under INSPRU 1.1.34R(2).

This reserve was set at a level that was sufficient to ensure that it covered the result of projecting (i) the riskadjusted cashflows of the assets backing the liabilities and (ii) the future liability payments on the valuation assumptions.

In any year where asset income exceeds liability outgo, the excess is assumed to be invested in cash which is assumed to accumulate at 97.5% of the maximum reinvestment rate specified in INSPRU 3.1.45R. In any year when asset income is insufficient to meet liabilities, the cash reserve is used to meet the shortfall. If the cash reserve is reduced to zero, then the shortfall is assumed to be borrowed at a rate 2% higher than 97.5% of the maximum reinvestment rate.

## 8. Other special reserves

Other special reserves in excess of £10 million are as follows:

Reserves totalling £254 million (£141 million in the WPSF, £102 million in SAIF and £11 million in the NPSF) are held to cover the potential costs of compensating policyholders, and the associated expenses, in respect of complaints about mortgage endowment policies. The reserves are calculated by making prudent assumptions about the number of future complaints received, the proportion of these where compensation will be paid, the average amount of compensation and recoveries under PI insurance.

Reserves totalling £57 million (£30 million in the WPSF, £16 million in SAIF and £11 million in the NPSF) are held to cover potential additional liabilities in respect of systems and administration errors. The methods used to calculate the reserves vary depending on the nature of the error and take into account data sources alternative to policy valuation systems.

Reserves totalling £133 million (£92 million in the WPSF, £18 million in SAIF and £23 million in the NPSF) are held in respect of the UK life insurance operation's share of additional contributions expected to be required to fund future defined benefits in the Prudential Staff Pension Scheme and the Scottish Amicable Pension Scheme, taking into account the expected run-off of the schemes' membership.

Reserves totalling £433 million (£293 million in the WPSF, £56 million in SAIF, £7 million in DCPSF and £77 million in the NPSF) are held to cover general contingencies, taking into account internal assessment of operational risk.

A reserve of £83 million is held in respect of Industrial Branch whole life and endowment assurances written in the WPSF, where the maturity date or (for whole life policies) the policy anniversary after age 90 has passed and the policy benefit has not been claimed, taking into account a prudent assumption for the probability that the claim will be made before age 105.

A reserve of £25 million is held for the Prudential Personal Retirement Plan (PPRP), a conventional withprofits deferred annuity product written in the WPSF, in respect of any additional cost of policyholders retiring later than age 65, taking into account current late retirement enhancement factors and a prudent assessment of the distribution of late retirements by age and sex.

A reserve of £17 million is held for whole of life and endowment assurance business in the WPSF to cover any additional cost of policyholders stopping paying premiums after 40 years from inception or the earlier date of maturity for endowment policies. The additional reserve is the amount by which the liability calculated assuming premiums cease after 40 years, or the earlier date of maturity for endowments, exceeds the basic liability which assumes that premiums will be paid until age 85 or, for endowment assurance policies, the maturity age if earlier.

Reserves totalling £12 million (£5 million in the WPSF, £6 million in SAIF and £1 million in the NPSF) are held in respect of claims that have been incurred but that are not yet reported. These reserves are calculated as a percentage of the retrospective claim amounts based on a prudent assumption about the delay in notification of claims.

## 9. Reinsurance

- (1) No premiums were paid in 2006 in respect of reinsurance business ceded on a facultative basis to reinsurers not authorised to carry on business in the United Kingdom.
- (2) The reinsurance treaties shown in the table below meet the FSA criteria for being reported in this section and were in force as at 31 December 2006.

Reinsurance treaties:

(d) Reinsurer	(e) Nature of cover	(f) Premiums £'000	(h) Open / Closed	(j) Reserves Ceded £'000	(k) Retention
Barclays Global Investors Pensions Management Ltd	Linked benefits under GPP3, GPP4, MPP3, stakeholder pensions and the Company Pension Transfer Plan (Bulk Section 32 Buy-Out) where the member has chosen to invest in BGIPM's funds, on a 100% quota share basis. The assets under this treaty are covered by a pari passu charge.	22,813	Open	21,015	Nil
Deutsche Asset Management Life & Pensions Limited	Linked benefits under GPP4, MPP3, stakeholder pensions and the Company Pension Transfer Plan (Bulk Section 32 Buy-Out) where the member has chosen to invest in DAML&P's funds, on a 100% quota share basis. The liability reassured is not covered by any charges on assets.	3,003	Open	15,648	Nil
Munich Reinsurance Company UK Life Branch	Individual UK term insurance issued before 1 January 2000 in surplus form on an original terms basis.	9,777	Closed	47,758	Nil retention, 100% reinsured
Prudential Annuities Limited*	United Kingdom non-profit pensions annuities in payment on a 100% quota share basis. This is to a member of the Prudential Group and is covered by a pari passu charge on assets.	1,733	Closed	8,742,470	Nil
Prudential Holborn Life Limited *	United Kingdom linked benefits under Prudence Bond, Prudence Managed Bond and Prudence Distribution Bond on a 100% quota share basis. This business is covered by a pari passu charge on assets.	445,051	Open	1,779,260	Nil
Prudential Pensions Limited *	United Kingdom linked benefits under Group AVC, MPP2, GPP1/2/3/4, SHP and PTP contracts on a 100% quota share basis. This is to a member of the Prudential Group and is covered by a pari passu charge on assets.	321,664	Open	1,426,281	Nil
Prudential Retirement Income Limited *	Two related treaties for annuity liabilities for relevant annuities issued by PAC. One covers annuities business from 1 July 2004 to 25 November 2004 and the other annuities after 25 November 2004. Under the terms of the agreement Prudential Retirement Income Limited will meet the liability of the Company to pay the benefits due under the reassured policies. This business is covered by a pari passu charge on assets.	969,195	Open	2,169,056	Nil

(d) Reinsurer	(e) Nature of cover	(f) Premiums £'000	(h) Open / Closed	(j) Reserves Ceded £'000	(k) Retention
Prudential Retirement Income Limited *	Annuity liabilities transferred from SAL, in respect of annuity policies in force at 30 September 2000. Under the terms of the agreement Prudential Retirement Income Limited will meet the liability of the Company to pay the benefits due under the reassured policies. The Company retains responsibility for the administration of the reassured policies. This business is covered by a pari passu charge on assets.	Nil	Open	308,726	Nil
Prudential Retirement Income Limited *	SAIF annuity contracts in payment at 31 December 2005.	560,415	Closed	568,852	Nil
Swiss Re Life & Health Limited	Two treaties covering unit-linked bond business on a quota share basis.	-818 (premium rebate)	Closed	70,627	For certain Flexible Bonds linked to the Extra Yield fund, 89% of all unit-linked liabilities are reinsured For Managed Income Bonds linked to Managed Income (Series A) units, 90% of all unit-linked liabilities are reinsured For Managed Income Bonds linked to Managed Income (Series B) units, 25% of all unit-linked liabilities are reinsured

(d) Reinsurer	(e) Nature of cover	(f) Premiums £'000	(h) Open / Closed	(j) Reserves Ceded £'000	(k) Retention
Swiss Re Life & Health Limited	Three treaties covering Prudential Protection business over consecutive periods on a quota share basis. The financing agreements with SRL&H detailed below are connected to this business.	10,672	Closed	52,645	Mortality Benefits only (per life) 10% up to £50,000 Nil above £50,000 Mortality plus CI and stand alone CI Benefits (per life) 10% up to £50,000 Nil above £50,000 Mortgage Payment Benefits (per life per annum) 25% up to £5,000 Nil above £5,000 Waiver of Premium Benefits (per life per annum) 25% up to £5,000 Nil above £5,000 Nil above £5,000

(d) Reinsurer	(e) Nature of cover	(f) Premiums £'000	(h) Open / Closed	(j) Reserves Ceded £'000	(k) Retention
Swiss Re Life & Health Limited	<b>Two financing arrangements</b> in respect of acquisition costs incurred in writing Prudential Protection contracts with a policy proposal date:	3,722	Closed	-	N/A
	• prior to 31 December 2002, an acceptance date in 2002 and a policy issue date prior to 31 March 2003				
	• in the range 6 May 2002 to 30 June 2003, a policy issue date in the range 1 January 2003 to 31 December 2003				
	<ul> <li>(i) Payments to the reinsurer are a proportion of the difference between the office premium and the reinsurance premium net of an allowance for renewal expenses for the time that the policy remains in force. If a policy lapses within the initial commission period the Company pays the reinsurer the amount of the indemnity commission that can be clawed back at that time. If a policy lapses outside of the initial commission period or becomes a mortality or morbidity claim at any time then payments to the reinsurer cease. The total amount paid to the reinsurer in respect of an individual policy is independent of the amount originally advanced by the reinsurer and depends on how long each policy remains in force. There is therefore no undischarged obligation.</li> </ul>				
	(ii) Allowance has been made for the repayment of this financing in calculating the level of the reserves required for these contracts.				
European Reinsurance Company of Zurich	<ul><li>Contingent Loan agreement. The repayment of which is contingent on the emerging surplus for the block of business to which it is linked.</li><li>No allowance has been made in the valuation for the repayment of the contingent loan.</li></ul>	19,271 (interest and capital repayment)	Open	-	N/A

(d) Reinsurer	(e) Nature of cover	(f) Premiums £'000	(h) Open / Closed	(j) Reserves Ceded £'000	(k) Retention
Hannover Rückversicherung AG	<ul> <li>Financing and quota share risk reassurance arrangement in respect of Flexible Protection Plans.</li> <li>(i) Payments to the reinsurer are a proportion of the office premium for the time that the policy remains in force. If a policy lapses within the initial commission period the Company pays the reinsurer a proportion of the amount of the indemnity commission that can be clawed back at that time. If a policy lapses outside of the initial commission period or exits due to a mortality claim at any time then payments to the reinsurer cease. The total amount paid to the reinsurer in respect of an individual policy is independent of the amount originally advanced by the reinsurer and depends on how long each policy remains in force. There is therefore no undischarged obligation.</li> <li>(ii) Allowance has been made for the reserves required for these contracts.</li> </ul>	250	Open	135	Mortality Benefits (per life) 10% up to £75,000 Nil above £75,000 Serious Illness Cover and Disability Cover 25% up to £75,000 Nil above £75,000 Waiver of Premium 25% up to £7,500 p.a. Nil above £7,500 p.a.

- (g) There were no deposit back arrangements under the above treaties.
- (i) There are no "undischarged obligations of the insurer". Premiums are payable only if the gross business remains in force.
- (1) All of the above companies are authorised to carry on insurance business in the United Kingdom with the exception of European Reinsurance Company of Zurich.
- (m) An asterisk (\*) denotes companies connected to the cedant.
- (n) In general the treaties are exposed to the credit risk of the reinsurers, against which a reserve is held.
- (o) The net liability includes no allowance for the refund of any reinsurance commission.

# 10. Reversionary (or annual) bonus

## Table 1 SAIF

Bonus series	Mathematical reserves	Annual bonus rate for		UWP unit price increase during the year	Guaranteed bonus rate during the year
		2006	2005		
	£m	%	%	%	%
Principal	3,250	0.80/1.50	0.80/1.50		
Flexidowment (Second Series)	287	0.70/1.70	0.70/1.70		
Net With Profits Fund 1	868	2.00/2.00	2.00/2.00		
Flexipension (First Series)	822	0.40/1.00	0.40/1.00		
Superannuation (Second Series)	250	0.40/1.00	0.40/1.00		
Group	118	1.10	1.10		
Exempt With Profits Funds 1	152	4.00	4.00	4.00	4.00
Exempt With Profits Funds 2	1,377	4.00	4.00	4.00	4.00
Exempt With Profits Funds 3	9	2.25	2.25	2.25	
Exempt With Profits Funds 3A <sup>*</sup>	1,571	4.00	4.00	4.00*	$4.00^{*}$
Exempt With Profits Funds 3B <sup>*</sup>	516	4.00	4.00	$4.00^{*}$	$4.00^{*}$
Exempt With Profits Funds 4 *	19	4.00	4.00	$4.00^{*}$	$4.00^{*}$

\* Bonus rate for investments made after 1/1/06 is 2.25%. Guaranteed bonus applies to pre 2006 investments only.

# 10. Reversionary bonus (continued)

# Table 2 WPSF - UK and, where appropriate, Guernsey, Jersey, and Isle of Man

Bonus series	Mathematical reserves	Annual bo	nus rate for	UWP unit price increase during the year	Guaranteed bonus rate during the year
		2006	2005		
	£m	%	%	0/0	%
With-profits industrial branch assurances issued before 1 July 1988	835	0.90/1.80	0.90/1.80		
Other conventional with-profits assurances	3,872	1.00/2.00	1.00/2.00		
Individual with-profits deferred annuities	5,367	0.25/0.50	0.25/0.50		
UWP life assurance bonds					
Prudence Bond – optimum return	9,267	3.25	3.25	3.25	
Prospects Bond – optimum return	27	2.85	2.85	2.85	
Prudence Bond – optimum bonus	622	4.00	4.00	4.00	
Prospects Bond – optimum bonus	19	3.60	3.60	3.60	
Prudential Investment Bond (accounts £6,000 and over)	2,967	3.25	3.25	3.25	
Prudential Investment Bond (accounts under £6,000)		2.25	2.25	2.25	
Group cash accumulation (defined benefit) with a 4.75% guarantee	294			-	4.75
Group cash accumulation (defined benefit) with a 2.5% guarantee	154	0.25	0.25	0.25	2.50
Group cash accumulation (defined benefit) with a 0.01% guarantee	129	2.74	2.74	2.74	0.01
Other group cash accumulation with a 4.75% guarantee	758	-	-	-	4.75
Other group cash accumulation with a 2.5% guarantee	1,981	0.50	0.50	0.50	2.50
Other group cash accumulation with a 0.01% guarantee	1,014	2.99	2.99	2.99	0.01

# 10. Reversionary bonus (continued)

# Table 2 WPSF - UK and, where appropriate, Guernsey, Jersey, and Isle of Man (continued)

Bonus series	Mathematical reserves	Annual bonus rate for		UWP unit price increase during the year	Guaranteed bonus rate during the year
		2006	2005		
	£m	%	%	%	%
Flexible Retirement Income Account	48	2.75	2.75	2.75	
Individual UWP pensions other than FRIA	12,981	3.25	3.25	3.25	
Pension Savings Plan	108	2.50	2.50	2.50	
Group UWP pensions	1,347	3.50	3.50	3.50	
Group UWP pensions with GMP guarantee	70	2.50	2.50	2.50	
With-profits pensions annuities in payment	1,299	2.75	2.75	2.75	
Former SAL products					
Net With Profits Fund 2	214	3.00/3.00	3.00/3.00		
Exempt With Profits Funds 5 and 6	258	3.375	3.375	3.375	
Exempt With Profits Funds 7 and 8	316	3.25	3.25	3.25	
Exempt With Profits Funds 9 and 10 (or C and C2)	43	3.25	3.25	3.25	
#### 10. Reversionary bonus (continued)

## Table 3 WPSF - Policies issued in Hong Kong

Bonus series	Mathematical reserves	Annual bonus rate for		UWP unit price increase during the year	Guaranteed bonus rate during the year
		2006	2005		
	£m	%	%	%	%
Conventional with-profits assurances - First series	176	3.50/3.50	3.50/3.50		
Conventional with-profits assurances - Better Life	942	3.00/4.30	3.00/4.30		
Conventional with-profits assurances - PRUsave Plus	141	1.70/1.70	-		
Group cash accumulation	47	3.50	5.00	3.50	
PRUsavings Plan	12	2.00	2.00	2.00	
Other UWP - US\$	170	1.75	1.75	1.75	
Other UWP - HK\$	845	1.95	1.95	1.95	

The table excludes Better Life series II policies with mathematical reserves of £52 million. Annual bonuses are added to these policies only from their third anniversaries, which are on 1 February 2007 at the earliest.

#### Table 4 DCPSF

Bonus series	Mathematical reserves	Annual bonus rate for		UWP unit price increase during the year	Guaranteed bonus rate during the year
		2006	2005		
	£m	%	%	%	%
Contracts expressed in euro					
Issued in France	79	3.75	3.75	3.75	
External reinsurance accepted	79	4.60	4.60	4.60	
International Prudence Bond	538	3.50	3.50	3.50	
Contracts expressed in sterling	328	3.75	3.75	3.75	
Contracts expressed in US dollars	295	3.50	3.50	3.50	

#### 10. Reversionary bonus (continued)

10.(4) Cash bonus contracts issued in Hong Kong for which mathematical reserves were £38 million on the valuation date vary by product, by age at entry and by duration in force. Rates vary from \$0.80 per \$1,000 sum assured at duration one year to \$8.00 per \$1,000 sum assured at duration 7 years.

### Valuation interest rates

Product group	2006	2005
	%	%
UK Pensions - WP CPAs	0.00	0.00
UK Pensions - Index-linked CPA reinsured to PRIL	1.55	1.34
UK Life - UWP (excluding endowment assurances issued by SALAS)	1.60	1.60
UK Pensions - Index-linked CPA reinsured to PAL	1.62	1.43
UK Pensions - UWP in WPSF	2.00	2.00
UK Pensions - Deposit Administration with 0.01% guarantee	2.00	2.00
DCPSF offshore bond - sterling currency	2.00	2.00
Hong Kong UWP - HK\$ currency	2.50	3.00
DCPSF products - euro currency	2.75	2.75
Hong Kong UWP US\$ currency	2.90	2.90
Life - CWP and CNP in SAIF and WPSF (excluding Hong Kong)	3.00	3.00
UK pensions - CWP group deferred annuities in the WPSF	3.00	3.00
DCPSF products - US\$ currency	3.00	3.00
Hong Kong - CWP, term assurance, accelerated CI in WPSF	3.10	3.10
UK Life - Prudential Protection and Home/Synergy Protect in NPSF	3.20	3.00
UK Life - UWP issued by SALAS	3.20	3.20
UK Life - Linked issued by SALAS	3.20	3.00
UK Life - Linked - other	3.20	3.20
Hong Kong - linked and protection riders excluding critical illness in NPSF	3.20	3.40
UK Pensions - non-profit deferred annuities, term assurance and UWP in WPSF	3.75	3.75
UK life - PHI and stand alone critical illness sold by the DSF in NPSF	3.95	3.75
UK Pensions - Linked in SAIF	4.00	3.75
UK pensions - retained non-profit annuities in WPSF	4.00	4.00
UK Life - annuities in WPSF	4.00	4.00
UK Pensions & OS - Deposit Administration with 2.5% guarantee	4.00	4.00
UK Pensions - term assurance	4.00	4.00
UK Pensions - WPDA in WPSF	4.25	4.25
UK Pensions - Group WPDA in SAIF	4.25/3.75	4.25/3.75
UK Pensions - Linked excluding SAIF	4.25	4.00
UK Pensions & OS - Deposit Administration with 4.75% guarantee	4.25	4.25
UK Pensions - with-profits endowments in SAIF	4.50	4.50
UK Pensions - individual with-profits deferred annuities in SAIF	4.50/3.75	4.50/3.75
UK Pensions - CPA reinsured to PAL	4.66	4.30
UK Pensions - CPA retained in NPSF	4.70	4.14
UK Pensions - CPA reinsured to PRIL	4.73	4.29

If deferred annuities are valued at the same rate of interest in possession as in deferment, only one rate of interest is shown. Otherwise, two rates are shown, the first being that in deferment.

Valuation interest rates shown for UK Life are net of tax.

# Valuation mortality bases

	2006	2005
UK Life - UWP and linked regular premium endowment assurances (Home Purchaser)	85% AM80 / 85% AF80	85% AM80 / 85% AF80
Industrial branch assurances	A1967/70 rated up 1 year	A1967/70 rated up 1 year
UK Life - linked Prudence Bond UK Pensions NPSF - group stakeholder, personal and money purchase pensions	AM92 / AF92 both rated down 3 years	AM92 / AF92 both rated down 3 years
UK Life WPSF - conventional assurances except Prudential Protection, UWP assurances except those issued by SAL or SALAS UK Pensions WPSF - group deposit administration	AM92 / AF92 both rated up 1 year	AM92 / AF92 both rated up 1 year
UK Life - assurances issued by SAL or SALAS, Prudential Protection in WPSF UK Pensions issued by SAL or SALAS	AM92 / AF92 both rated up 1 year plus 1/3 of projection R6A of the Institute of Actuaries AIDS Working Party Bulletin No. 5	AM92 / AF92 both rated up 1 year plus 1/3 of projection R6A of the Institute of Actuaries AIDS Working Party Bulletin No. 5
UK Life - Prudential Protection in NPSF	110% of AM/AF92 plus 1 year plus 1/3 AIDS 'R6A' for both males and females	AM92 / AF92 both rated up 1 year plus 1/3 of projection R6A of the Institute of Actuaries AIDS Working Party Bulletin No. 5
UK Pensions - individual UWP pensions sold by the DSF	AM92 rated up 1 year for men and rated down 3 years for women	AM92 rated up 1 year for men and rated down 3 years for women
UK Life NPSF - linked assurances sold by the DSF	Single life: AM92 rated down 3 years for men and rated down 8 years for women Joint lives: AM92 rated up 3 years	Single life: AM92 rated down 3 years for men and rated down 8 years for women Joint lives: AM92 rated up 3 years
UK Pensions - group deferred annuities in deferment in WPSF and Flexipension in deferment in SAIF	AM92 / AF92 both rated down 4 years	AM92 / AF92 both rated down 4 years
UK Pensions WPSF - group deferred annuities in possession ceded to PAL (GPDA admin system)	Modified 126% PNMA00 Modified 117% PNFA00	80% PMA92c2004 87.3% PFA92c2004
UK Pensions WPSF - group deferred annuities in possession ceded to PAL (DAPA admin system)	Modified 112% PNMA00 Modified 107% PNFA00	Modified 79% PMA92c2004 Modified 86% PFA92c2004

# Valuation mortality bases

	2006	2005
UK Pensions WPSF - WP individual deferred annuities in deferment	AM92 rated down 3 years for men and 7 years for women with mortality improvement being allowed by a reduction of 0.40% p.a. in the valuation interest rate	AM92 rated down 3 years for men and 7 years for women with mortality improvement being allowed by a reduction of 0.40% p.a. in the valuation interest rate
UK Pensions WPSF - WP individual deferred annuities in possession	68% PMA92c2004 / 67% PFA92c2004	70% PMA92c2004 / 68% PFA92c2004
UK Pensions - WPSF annuities reassured to PRIL	Modified 99% PNMA00	Modified 88.6% PMA92c2004
	Modified 85% PNFA00	Modified 84.4% PFA92c2004
UK Pensions - SAIF deferred annuities in possession	Modified 113% PNMA00	Modified 98% PMA92c2004
	Modified 86% PNFA00	Modified 84% PFA92c2004
UK Pensions - SAIF annuities ceded to PRIL	Modified 99% PNMA00	Modified 98% PMA92c2004
	Modified 85% PNFA00	Modified 84% PFA92c2004
UK Pensions - NPSF annuities	Modified 110.5% PNMA00	Modified 98% PMA92c2004
	Modified 86.1% PNFA00	Modified 84% PFA92c2004
UK Pensions - WP annuities in payment	Modified 92%PNMA00	Modified 84% PMA92c2004
	Modified 80% PNFA00	Modified 78% PFA92c2004
UK Pensions - WPSF individual annuities retained in	Modified 106% PNMA00	Modified 93% PMA92c2004
PAC or reassured to PAL	Modified 84% PNFA00	Modified 84% PFA92c2004
UK Pensions - Flexible Lifetime Annuity	Modified 105% PNMA00	Modified 94% PMA92c2004
	Modified 80% PNFA00	Modified 78% PFA92c2004
Hong Kong assurances except cash bonus and UWP	90% AM92	90% AM92
policies	90% AF92	90% AF92
Hong Kong cash bonus policies	125% HKA93	125% of HKA93
Hong Kong UWP assurances	165% HKA93	180% of HKA93
DCPSF - Prudential Vie	TV8890 / TD8890 both rated down 3 years	TV8890 / TD8890 both rated down 3 years
DCPSF - other	AM92 / AF92	AM92 / AF92

#### Annuity mortality bases used at 31 December 2006

Annuities are generally valued using a percentage of the 00 series tables for annuitants and pensioners. In order to allow for mortality improvement, improvement factors are applied from 2001 and the bases in the table above are therefore described as "modified". For men these are in line with 100% of the CMI medium cohort projections, subject to future improvement factors are in line with 75% of the CMI medium cohort projections, subject to future improvement factors not being less than 1.25% p.a.

In practice, the individual annuities in payment ceded from the NPSF have been valued using percentages of single entry tables based on the 92 series tables for annuitants and pensioners, with calendar year 2004 (improvements in line with CMIR17 until 2004). The percentages have been chosen so that the rates used are equivalent to the double entry tables with future improvement factors as described above.

#### Annuity mortality bases used at 31 December 2005

Annuities were generally valued using a percentage of the 92 series tables for annuitants and pensioners. In order to allow for mortality improvement, the CMIR17 mortality improvement factors were applied up to and including 2004. As with the 00 series, references to the 92 series in the table above are described as "modified" where such improvements have been used. Future improvement factors were applied from 2005, and for men were in line with 100% of the CMI medium cohort projections, subject to future improvement factors not being less than 1.25% p.a. For women, future improvement factors were in line with 75% of the CMI medium cohort projections, subject to future improvement factors not being less than 0.75% p.a.

The individual annuities in payment ceded from the NPSF were valued using percentages of single entry tables based on the 92 series with calendar year 2004. The percentages were chosen so that the rates used were equivalent to double entry tables with future improvement factors as described above.

## Immediate and deferred annuities: expectations of life at different ages

Basis description	Life expectancy for a	nnuities in payment	Life expectancy for	deferred annuities
	At 65	At 75	At 65 for current age 45	At 65 for current age 55
Modified 126% PNMA00			men: 22.7	men: 21.5
Modified 117% PNFA00			women: 23.7	women: 23.1
80%PMA92c2004			men: 21.6	men: 20.9
87.3%PFA92c2004			women: 24.1	women: 23.3
Modified 112% PNMA00			men: 23.7	men: 22.6
Modified 107% PNFA00			women: 24.4	women: 23.8
Modified 79% PMA92c2004			men: 21.6	men: 20.9
Modified 86% PFA92c2004			women: 24.1	women: 23.3
68%PMA92c2004	men: 21.4	men: 13.5	men: 23.0	men: 22.2
67%PFA92c2004	women: 24.9	women: 16.6	women: 26.7	women: 25.7
70%PMA92c2004	men: 21.2	men: 13.3	men: 22.8	men: 22.0
68%PFA92c2004	women: 24.8	women: 16.5	women: 26.6	women: 25.6
Modified 99% PNMA00	men: 22.4	men: 13.7		
Modified 85% PNFA00	women: 25.0	women: 16.0		
Modified 113% PNMA00			men: 23.9	men: 22.7
Modified 86% PNFA00			women: 26.3	women: 25.6
Modified 88.6% PMA92c2004	men: 22.1	men: 13.4		
Modified 84.4% PFA92c2004	women: 24.9	women: 16.2		
Modified 92%PNMA00	men: 23.1	men: 14.3		
Modified 80% PNFA00	women: 25.5	women: 16.4		
Modified 84% PMA92c2004	men: 22.6	men: 13.8		
Modified 78% PFA92c2004	women: 25.7	women: 16.9		
Modified 106% PNMA00	men: 21.8	men: 13.2		
Modified 84% PNFA00	women: 25.1	women: 16.1		
Modified 93% PMA92c2004	men: 21.6	men: 13.0		
Modified 84% PFA92c2004	women: 25.0	women: 16.3		
Modified 105% PNMA00	men: 21.9	men: 13.3		
Modified 80% PNFA00	women: 25.5	women: 16.4		
Modified 94% PMA92c2004	men: 21.5	men: 13.0		
Modified 78% PFA92c2004	women: 25.7	women: 16.9		
Modified 98% PMA92c2004	men: 21.1	men: 12.7		
Modified 84% PFA92c2004	women: 25.0	women: 16.3		
Modified 110.5% PNMA00	men: 21.5	men: 12.9		
Modified 86.1% PNFA00	women: 24.9	women: 15.9		

The table below shows the expectations of life at different ages for the mortality tables reported in Appendix 2 used to value annuities in possession.

## Morbidity bases

#### A4.1 Critical illness and total and permanent disability (TPD) business issued in Hong Kong

Rates per 10,000 sum assured

A4.1.1 Contracts that cover 12 dread diseases. These are closed to new business.

0	Age next Critical illness rates					TPD rates
Birthda	ıy	Male Non	Male Smoker	Female Non	Female Smoker	
		Smoker		Smoker		
25		7.74	6.93	4.32	6.21	0.72
35		7.92	9.45	10.08	11.61	1.08
45		20.97	28.44	22.77	30.33	2.70
55		55.80	75.24	49.59	61.29	7.02

#### A4.1.2 Contracts that cover 30 dread diseases.

Age next					
Birthday	Male Non	Male Smoker	Female Non	Female Smoker	
	Smoker		Smoker		
25	7.74	7.65	8.73	10.44	0.72
35	9.18	10.44	10.98	11.34	1.08
45	21.51	28.71	20.43	30.24	2.70
55	55.62	75.42	61.83	80.64	7.02

#### A4.2 Lady Prudence contracts issued in Hong Kong

Rates per 10,000 sum assured

Age next	Morbidity rates (for women only)		
Birthday	Basic benefit	Extra benefit	
25	12.4	40.1	
35	23.9	57.0	
45	25.2	90.0	
55	30.1	Not applicable	

#### A4.3 Prudential Protection

A4.3.1 Life and basic critical illness rates per £10,000 sum assured

Age next	Men		Women	
Birthday	Non Smoker	Smoker	Non Smoker	Smoker
25	8.95	8.95	6.90	6.90
35	14.07	22.08	12.59	12.59
45	29.28	58.03	27.26	27.26
55	80.51	148.44	63.77	80.79

#### Morbidity bases (continued)

Age next	Men		Women	
Birthday	Non Smoker	Smoker	Non Smoker	Smoker
25	4.82	4.82	5.68	5.68
35	9.63	14.92	11.64	11.64
45	23.64	46.30	26.42	26.42
55	68.82	125.65	61.57	77.89

A4.3.2 Top-up critical illness rates per £10,000 sum assured

For business written after 13 March 2005 the rates are increased by 14% to cover possible future changes in morbidity.

In the NPSF where prudent lapse assumptions are allowed for in the reserve calculations, the rates are increased by 10% to allow for the possibility of selective withdrawals.

#### A4.4 Benefits attached to Home Purchaser (Series 3) and Amicable Savings Plan

A4.4.1 Home Purchaser (Series 3) version 2 issued on or after 29 July 1996

Age next	Men		Women	
birthday	Non Smoker	Smoker	Non Smoker	Smoker
25	3.84	6.29	4.39	7.12
35	8.45	14.01	11.87	19.71
45	35.57	59.50	27.27	45.44
55	83.87	140.44	61.77	103.36

Level top-up critical illness rates per £10,000 sum assured

A4.4.2 Home Purchaser (Series 3) other than those above and Amicable Savings Plan

Level critical illness rates per £10,000 sum assured

Age next	Men		Women		
Birthday	Non Smoker	Smoker	Non Smoker	Smoker	
25	2.73	4.42	3.38	5.45	
35	6.49	10.64	8.43	14.01	
45	27.87	46.41	17.77	29.69	
55	47.70	79.71	37.34	62.48	

A4.4.3 Home Purchaser (Series 3)

Decreasing top-up annual critical illness rates per £10,000 sum assured

Age next	Men		Women		
Birthday	Non Smoker	Smoker	Non Smoker	Smoker	
25	4.14	6.79	4.74	7.68	
35	9.11	15.11	12.80	21.26	
45	38.36	64.17	29.41	49.00	
55	90.45	151.46	66.61	111.47	

#### Morbidity bases (continued)

#### A4.4.4 Home Purchaser (Series 3) and Amicable Savings Plan

Total and permanent disability rates per £10,000 sum assured

Age next	Basic	Version 2	Version 2
Birthday		Level top-up	Decreasing top-up
25	0.78	0.98	1.06
35	0.91	0.86	0.92
45	2.33	2.20	2.38
55	7.91	8.69	9.37

#### A4.4.5 Home Purchaser (Series 3)

Annual mortgage interest benefit rates per £1,200 annual benefit without critical illness, occupation classes 1, 2 and 3, deferred period 6 months

#### Men

Age Next Birthday	Policy Term Remaining						
	5	10	15	20	25		
25	2.88	3.84	4.44	4.68	4.68		
35	4.44	6.24	7.20	7.44	7.56		
45	11.52	16.32	18.72				
55	36.36						

#### Women

Age Next Birthday	Policy Term Remaining						
	5	10	15	20	25		
25	4.32	5.88	6.72	6.96	6.96		
35	6.72	9.36	10.80	11.04	11.40		
45	17.16	24.48	27.96				
55	54.48						

No recovery rates are shown as claim inception and recovery are not modelled. Instead an inception annuity approach based on rates from the reinsurer is used. The rates therefore allow implicitly for both the probability of a claim and the expected length of the claim.

## Valuation expense bases

#### A5.1 SAIF

		3	31 December 200	6	3	31 December 200	5
Product code(s)		Maintenance expenses	Termination expenses	Investment expenses	Maintenance expenses	Termination expenses	Investment expenses
		£ per annum	£	basis points pa	£ per annum	£	basis points pa
400	Annuity	28.05		10.00	27.45		10.00
525	UWP regular premium pension	37.98	113.16	12.80	39.79	184.76	14.80
525	UWP single premium pension	26.21	113.16	12.80	24.86	184.76	14.80
535	UWP group regular premium pension	78.80	96.06	12.80	60.78	108.83	14.80
535	UWP group single premium pension	50.62	96.06	12.80	37.48	108.83	14.80
725	UL regular premium pension	37.98	113.16	25.00	39.79	184.76	25.00
725	UL single premium pension	26.21	113.16	25.00	24.86	184.76	25.00
735	UL group regular premium pension	78.80	96.06	25.00	60.78	108.83	25.00
735	UL group single premium pension	50.52	96.06	25.00	37.48	108.83	25.00

Conventional contracts are valued using a net premium method, zillmerised for with-profits contracts and unmodified for term assurances. The zillmer adjustment is 3% of sums assured for with-profits life business and 2% for with-profits pensions.

#### A5.2 WPSF

		3	31 December 200	6	3	31 December 200	5
Product code(s)		Maintenance expenses	Termination expenses	Investment expenses	Maintenance expenses	Termination expenses	Investment expenses
		£ per annum	£	basis points pa	£ per annum	£	basis points pa
340 to 355, 365 and 385	Critical illness, income protection in force and income protection claims in payment	37.65	40.04	10.00	26.37	53.81	10.00
400	Annuity	22.33		10.00	20.00		10.00
500	UWP bond	56.54		13.00	41.52		13.00
510	UWP savings endowment	34.69	47.95	12.80	24.68	64.54	14.80
515	UWP target cash endowment	34.69	47.95	12.80	24.68	64.54	14.80
525	UWP regular premium pension	37.84		13.00	41.46		13.00
525	UWP single premium pension	32.16		13.00	35.24		13.00
535	UWP group pension	134.01		13.00	188.97		13.00
710	UL bond	24.57	47.95	25.00	15.03	64.54	25.00
715	UL savings endowment	34.69	47.95	25.00	24.68	64.54	25.00
720	UL target cash endowment	34.69	47.95	25.00	24.68	64.54	25.00
735	UL group pension	139.44		25.00	n/a		n/a

Conventional contracts are valued using a net premium method, zillmerised for with-profits contracts and unmodified for term assurances. The zillmer adjustment is 3% of sums assured for with-profits life business and 2% of the value of the annuity at retirement for with-profits pensions deferred annuities.

## A5.3 NPSF

		<b>31 December 2006</b>			31 December 2005		
Product code(s)		Maintenance expenses	Termination expenses	Investment expenses	Maintenance expenses	Termination expenses	Investment expenses
		£ per annum	£	basis points pa	£ per annum	£	basis points pa
325, 330, 340 to 355 and 365	Term assurance, critical illness and income protection	37.65	40.01	10.00	26.37	53.81	10.00
400	Annuity	25.91		7.00	22.42		7.00
700	UL bond	11.32	14.21	18.00	20.36	53.81	18.00
715	UL savings endowment	22.00	86.00	15.00	24.00	62.00	15.00
720	UL target cash endowment	13.26	14.21	25.00	33.87	53.81	25.00
725	UL regular premium pension	15.07	49.72	25.00	48.90	171.54	25.00
725	UL single premium pension	9.75	49.72	25.00	30.55	171.54	25.00
735	UL group pension	51.74		25.00	165.74		25.00

For linked business, the figures for 2006 are for per-policy attributable expenses only. For 2005 they are for total per-policy expenses.

## APPENDIX 9.4A

## VALUATION REPORT FOR REALISTIC VALUATION ON THE PRUDENTIAL ASSURANCE COMPANY LIMITED AS AT 31 DECEMBER 2006

Throughout this document the abbreviations "CWP" and "AWP" are used for Conventional With-Profits business and Accumulating With-Profits business respectively.

#### 1. Introduction

- (1) The investigation relates to 31 December 2006.
- (2) The date of the previous valuation related to 31 December 2005.
- (3) A valuation was carried out at 30 June 2006 in accordance with IPRU(INS) rule 9.3A.

#### 2. Assets

(1) The economic assumptions used to determine the value of future profits on non-profit business written in the WPSF and SAIF are:

Description	31 Decen	nber 2006	31 December 2005		
	Gross	Net	Gross	Net	
	%	%	%	%	
Investment return	4.830	3.864	4.160	3.328	
Less: Investment expenses	0.116	0.093	0.118	0.094	
Discount rate	4.714	3.771	4.042	3.234	
Inflation (except IB business)	3.1	3.1	2.9	2.9	
Inflation (IB business)	5.1	5.1	4.9	4.9	

The DCPSF has no non-profit business.

(2) For the WPSF, the economic assumptions used to determine any additional amount arising from the excess of the present value of future profits (or losses) of Prudential Annuities Limited (PAL) in accordance with INSPRU 1.3.33R(3)(b)(iii) are:

Description	31 December 2006	31 December 2005
	%	%
Investment return	4.735	4.374
Less: Investment expenses	0.060	0.060
Discount rate	4.675	4.314
Rate of tax on profits	30	30

SAIF and the DCPSF have no assets valued under INSPRU 1.3.33R(3)(b)(iii).

- (3) Not applicable
- (4) Not applicable
- (5) Not applicable

## 3. With-Profits Benefits Reserve Liabilities

Business class	Met	Method		Future policy related liabilities
WPSF			£m	£m
Ex-Direct Sales Force (DSF) Industrial Branch (IB)	Retrospective*	Grouped	2,251	73
DSF CWP Ordinary Branch (OB) assurances	Retrospective*	Grouped	5,833	(119)
DSF PPRP	Retrospective*	Grouped	6,048	149
DSF AWP Life	Retrospective*	Individual	3,493	22
DSF AWP Pensions	Retrospective*	Grouped	18,212	823
Ex-ISC Pensions	Retrospective*	Individual	1,717	196
Group Pensions	Retrospective*	Individual	7,381	168
With profit immediate annuities	Retrospective*	Individual	1,443	112
Prudence Bond	Retrospective	Individual	12,716	50
Ex-SAL AWP	Retrospective	Individual	1,019	31
Hong Kong	Retrospective	Grouped	2,589	277
Malta	Retrospective	Grouped	10	-
Additional reserve	Other	n/a	-	391
Sub-total			62,713	2,173
SAIF				
CWP	Retrospective*	Individual	6,713	535
AWP – Pensions	Retrospective*	Individual	4,551	826
AWP – Life	Retrospective*	Individual	1,197	109
Additional reserve	Other	n/a	22	78
Sub-total			12,483	1,548
DCPSF				
PAC France	Retrospective	Individual	88	-
Canada Life (Germany)	Retrospective	Individual	94	-
International Prudential Bond	Retrospective	Individual	1,392	-
Sub-total			1,574	-
Total PAC			76,770	3,721

(1) The methods used to calculate the with-profits benefits reserves are:

\* Adjusted as described in section 5

99.7% of SAIF AWP Pensions business has a minimum guarantee attached. Certain Group Pension contracts include minimum rates of guarantee ranging from 2.5% to 4.75%

(2) The with-profits benefits reserves and future policy related benefits correspond to the amounts shown in Form 19.

#### 4. With-Profits Benefits Reserves – Retrospective method

(1)(a)&(b) The proportions of the with-profits benefit reserve (excluding additional reserves) calculated using individual or grouped methodology as shown in 3.(1) are:

	WPSF	SAIF	DCPSF
	%	%	%
Individual basis	45	100	100
Grouped basis	55	0	0
Other	0	0	0
Total	100	100	100

(1)(c)(i) For WPSF DSF CWP, policies are differentiated by benefit type (eg full endowment, low cost endowment, whole life or deferred annuity), sex (but not for IB assurances) and premium status (single, regular, fully paid or partly paid) and then grouped, by age, duration and original policy term. Only policies with the same age, duration and policy term are grouped together (i.e. data is not grouped into bands).

For WPSF DSF AWP pensions business, the approach is the same as for CWP except that policies are not differentiated by sex and paid up policies are grouped only if they had the same curtate duration when they were made paid-up. In addition DWP rebate business is differentiated according to sex, maturity age and curtate duration in force at the valuation date.

(1)(c)(ii) The number of individual contracts and the number of model points used to represent them at 31 December 2006 are:

Product	Policies	Valuation file records	Number of model points
DSF IB	1,215,918	1,215,918	16,068
DSF CWP OB assurances	487,267	516,458	178,419
DSF CWP PPRP	278,866	603,177	302,521
DSF AWP pensions - rebates	366,741	472,849	8,400
DSF AWP pensions - other	588,275	3,276,301	428,714

The number of records in the valuation file can exceed the number of policies because:

- new records are set up for increments to existing policies, and
- for unitised with-profits pensions business, separate records are set up for ordinary rights regular premium, ordinary rights single premium, protected rights and life cover.

The Hong Kong with-profits benefits reserve is calculated by scaling up the results in respect of representative sample policies for each product. The sample policies represent 71% of the total Hong Kong with-profits benefits reserve.

(1)(c)(iii) The main classes valued on a grouped basis are the products originally sold through the former Direct Sales Force. The business volumes of the grouped classes are large and homogeneous and the grouping basis used has been designed to separate out any significant attributes that affect the retrospective benefit reserve. The model points lead to an accurate retrospective valuation. A previous investigation verified that the asset shares using grouped and ungrouped data were within 0.01% for each class of business.

- (2)(a) Prior to 31 December 2006 the provision for (as yet) unclaimed Industrial Branch (IB) policies at advanced ages was held within the non-profit reserves. As these policies continue to attract bonuses it is more appropriate to include the reserve in the with-profits benefits reserve and this change was made at 31 December 2006.
- (2)(b) Not applicable
- (3) Directly attributable expenses are allocated to the products or product groups to which they relate. Other expenses are mostly apportioned by reference to such measures as considered appropriate, for example business volumes, time spent, or mean fund (for investment expenses). SAIF is charged expenses in accordance with the provisions of the Scheme of Transfer.
- (3)(a) The previous full expense investigation related to 2005.
- (3)(b) A full review of the company's cost allocation basis is carried out annually to ensure maintenance of an appropriate allocation of expenses to the with-profit and other parts of the long-term fund. Additional reviews are conducted quarterly.

Description	WPSF	SAIF	DCPSF
	£m	£m	£m
Initial expenses including commission #	103	1	0
Maintenance expenses	215	46	10
Investment management expenses	232	17	0
Total expenses charged to with profits	550	65	10
benefit reserve			
Total expenses <b>not</b> charged to with	181	9	(12)
profits benefit reserve			, í
Total Expenses as shown in Form 40	731	74	(2)

(3)(c)(i)&(ii) Expense allocation for 2006

# Net of any initial expenses written off

Investment expenses in respect of property maintenance and PPM Capital are allowed for in the calculation of investment returns credited to asset shares rather than being reflected as an explicit expense charge.

The investment expenses shown above exclude those incurred in respect of the assets backing the free estate.

For the DCPSF Prudential International Bond, explicit charges are specified in the policy and passed to the Non-Profit Sub-Fund, which bears the actual costs incurred.

(3)(c)(iii) Expenses charged to the with-profits benefits reserve are expressed as some or all of an amount per policy, a percentage of premium or sum assured, or a reduction in the investment return, with an allowance for tax relief where appropriate.

- (3)(c)(iv) Certain expenses are not charged to the with-profits benefits reserve. In particular:
  - Expenses related to non-profit or unit-linked business.
  - Deductions for initial expenses are restricted to the policy-specific charges used when illustrating benefits at the point of sale.
  - For the WPSF, expenses associated with the personal pensions mis-selling review are met by the inherited estate rather than asset shares.
  - For a number of pension contracts the net impact of deductions has been limited to 1% p.a. since April 2001, though this level of charge is not guaranteed to apply in future.
- (4) For WPSF policies, a charge for guarantees is expressed as a proportion of asset shares. The with-profits benefits reserves are shown before this charge. The current charge is 2% for all business although, for With-Profits Immediate Annuities, the charge is expressed as a 0.16% pa reduction in the investment return credited to the with-profits benefits reserve.

For SAIF, two charges were made in 2006:

- an annual charge for the cost of guaranteed annuity options of 0.25% of asset shares for policies with these guarantees. This is the maximum amount which can be charged directly to asset shares for this cost. Any excess of the guaranteed annuity option costs over the charge made reduces the potential surplus available to enhance claim values under the Scheme of Transfer.
- an annual charge for the capital support provided by the Scottish Amicable Capital Fund (SACF) of 0.15% of asset shares.

For the DCPSF, an annual charge equivalent to a 0.2% pa reduction in the investment return is made for the capital support provided by the WPSF.

For the WPSF, SAIF and the DCPSF the level of charges deducted during 2005 and 2006 is shown below:

Fund	2006 charges £m	2005 charges £m
WPSF	124	95
DCPSF	1	1
SAIF	50	68

- (5) For the WPSF, shareholder transfers are charged to the with-profits benefits reserve. In 2006 the shareholder transfers amounted to £269m.
- (6) The table below shows the ratio of claims (excluding deaths) paid over each of the last three years to the asset shares for those policies (including the contribution from miscellaneous surplus).

Fund	2006	2005	2004
	%	%	%
WPSF	93	97	100
DCPSF	89	97	99
SAIF	93	94	98

54

(7) The 2006 rates of investment return, before tax and investment management expenses, allocated to the with-profits benefits reserves were as follows:

Fund	Business	Investment return %
WPSF	Prudence Bond Optimum Bonus	10.05
	Other UK	12.41
SAIF	All	11.82
	Sterling funds	12.41
DCPSF	US dollar funds	15.08
	Euro funds	11.35

The investment return for Prudence Bond Optimum Bonus business reflects a higher fixed interest content than for the main WPSF, in line with the notional investment mix of assets which is appropriate for that product line.

The investment return for Hong Kong business reflects the investment mix appropriate to each product line.

#### 5. With-profits benefits reserves – Prospective method

With-profits benefits reserves are primarily based on the retrospective asset shares. However a number of adjustments are made because:

- WPSF DSF CWP whole life policies include significant death benefits that are more appropriately valued using expected future bonus rates rather than aggregate asset shares.
- WPSF IB bonus rates are derived from the corresponding OB rates, as opposed to the IB asset shares, in line with the undertaking given in 1988 when the IB and OB assets were merged. At that time, the Prudential undertook to declare IB bonuses that were equal to 100% of OB rates for new business issued from July 1988 and at least 90% of OB rates for business issued prior to July 1988.
- The Company has restricted the future implicit fund charge on many pension contracts to reflect its intention to restrict charges on personal pensions to stakeholder consistent levels, so restricting its ability to target claim values on the underlying asset shares.
- For some product lines the only asset shares available are charges asset shares (where asset shares have been built up using the charges associated with that product line) rather than expenses asset share (where the actual expenses have been charged). The prospective method is used to value the future liabilities (based on bonus rates derived from the charges asset shares) and determine the equivalent (expenses) asset shares required to meet such bonus rates.
- The SAIF asset share liability is increased by the value of the Scottish Amicable Account (SAA) AWP life business, calculated on a charges less expenses basis, that is passed to the WPSF.

These adjustments to the underlying asset share liability are determined using a bonus reserve valuation approach. This is a prospective approach which determines the present value of liabilities allowing for expected rates of future reversionary and terminal bonuses.

A prospective valuation is not performed for the DCPSF, nor SAIF with the exception of the SAA business mentioned above.

The non-economic assumptions largely reflect the realistic component of the regulatory basis excluding the margins for adverse deviation (MADs). The elements of the resulting reserves that represent the bonus glidepath costs and prospective miscellaneous surpluses are identified and deducted from the prospective liability to determine the adjusted with-profits benefits reserves.

Prospective reserves are also determined for all major WPSF product lines as an additional check that with-profits benefit reserves fully reflect the provision for policyholders' benefits.

	31 Decen	31 December 2006 31 December 200		nber 2005
	Gross	Net	Gross	Net
	%	%	%	%
Investment return	7.49	6.61	7.07	6.27
Less: Investment expenses	0.12	0.09	0.12	0.09
Discount rate	7.37	6.52	6.95	6.18
Expense Inflation (except IB business)	3.1	3.1	2.9	2.9
Expense Inflation (IB business)	5.1	5.1	4.9	4.9
Annuity interest rate	4.90	N/A	4.63	N/A
(PPRP risk free rate of interest)				

(1)(a)(b)&(c) The economic assumptions for the WPSF and SAA AWP business are:

The economic assumptions used to value the prospective benefits are the same as those used for European Embedded Value reporting, which represent our best estimate assumptions allowing for prevailing market conditions at the valuation date, thereby complying with INSPRU 1.3.130 R. The discount rates therefore differ from the risk free rates required by 6.(4)(a)(iii).

- (1)(d) Future annual and final bonus rates for WPSF significant product lines are shown in Appendix 8.
- (1)(e) Future expense assumptions for significant product lines are shown below

PER POLICY EXPENSE	ES	
Product	Premium Paying (£)	PUP (% of premium paying)
IB	19.28	16.7
OB Life	35.77	85
PPRP	33.88	85
Personal Pensions	33.88	85
AVCs	74.11	20
Cash Accumulation Defined Benefit	567.00	20

The expense assumptions are the realistic component of the peak 1 basis i.e. before the application of the margin for adverse deviation (MAD).

(1)(f) Future persistency assumptions for significant product lines are as follows (using the same format as for paragraph 6.(6)):

Product	Decrement	Average surrender/paid-up rate for the policy years			•
		1-5	6-10	11-15	16-20
CWP savings endowment	surrender	8.96	3.36	1.40	1.40
CWP target cash endowment	surrender	8.96	3.36	1.40	1.40
UWP savings endowment	surrender	N/A	N/A	N/A	N/A
UWP target cash endowment	surrender	N/A	N/A	N/A	N/A
UWP bond	surrender	4.10	12.80	8.50	8.50
UWP bond	automatic withdrawals	0.00	0.00	0.00	0.00
CWP pension regular premium	PUP	3.50	4.00	3.00	3.00
CWP pension regular premium	surrender	1.50	1.50	1.50	1.50
CWP pension single premium	surrender	1.00	1.00	1.00	1.00
UWP individual pension regular premium	PUP	9.50	7.50	5.00	5.00
UWP individual pension regular premium	surrender	3.50	3.50	3.50	3.50
UWP individual pension single premium	surrender	3.00	3.00	3.00	3.00

#### 6. Cost of guarantees, options and smoothing

### (1) Not applicable

- (2)(a) For the WPSF and SAIF, the value of guarantees, options and smoothing costs, net of the charge for such guarantees is determined by using market-consistent stochastic models as follows:
  - For WPSF business issued in Hong Kong, the HK stochastic asset liability model (HKSALM) is used.
  - The reserve in the WPSF for guarantees resulting from the personal pension misselling review is calculated using the Pension Misselling Reserve model.
  - The reserve in the WPSF for the guaranteed minimum pensions (GMPs) on Section 32 type products is calculated using the Guaranteed Minimum Pension model.
  - For all other WPSF business issued in the UK, the Prudential Stochastic Asset Liability Model (PSALM), our in-house model, is used to value product-related guarantees, except for the small volume of guaranteed annuity options (GAOs), for which the realistic reserve is set equal to the regulatory reserve.
  - For SAIF business, including SAIF GAOs, PSALM is used.

For the DCPSF, a bonus smoothing account is maintained in the WPSF and credited or debited as appropriate with any difference between claim payments made from the DCPSF and the relevant policies' underlying asset shares. It is intended that these smoothing transfers should generate no net profit or loss over the long term. Claim payouts can be adjusted to cover the cost of guarantees and smoothing. If, however, in extreme circumstances, a shortfall arises in the bonus smoothing account, additional capital support is provided by the WPSF. The WPSF receives an annual charge from the NPSF for this support. Within the WPSF a further reserve is therefore held in line with the cost on similar contracts. Our presentation of this is that, for the DCPSF, the present value of guarantee and smoothing costs are set equal to the current charge for such costs. In addition, the reserves and charges for guarantees and smoothing costs in the WPSF are increased in proportion to the relative asset shares of DCPSF and similar WPSF contracts. (2)(b)(i)(ii) The reserves in respect of the personal pension mis-selling review, GMPs and &(iii) WPSF GAOs are valued on an individual basis.

SAIF GAOs are valued on a grouped basis, under which 75,095 contracts have been represented by 891 model points.

For other product-related guarantees the model points used in the valuation are all grouped data sets generated using one of the following:

- individual policy details
- grouped data from other similar contracts
- a representative set of policies

The business grouped by each method is:

Business	Valuation method	Model point grouping	Contracts	Model points
WPSF-UK	PSALM	Grouped	4,446,561	8,014
WPSF-HK	HKSALM	Representative model points	481,153	279
SAIF	PSALM	Grouped	816,660	1,513

Model points used to determine the cost of guarantees and smoothing in the 31 December 2006 FSA return were generated from in-force data extracted at 31 December 2005, 30 June 2006 and 30 September 2006. These model points were then rolled forward to 31 December 2006.

New model points based on data as at 31 December 2005 have been produced for product classes covering 27% (WPSF) and 100% (SAIF) of total asset shares and 7% (WPSF) and 100% (SAIF) of the total net cost of guarantees and smoothing. New model points based on data as at 30 June 2006 have been produced for product classes covering 49% (WPSF) and 0% (SAIF) of total asset shares and 37% (WPSF) and 0% (SAIF) of total asset shares and 37% (WPSF) and 0% (SAIF) of total asset shares and 37% (WPSF) and 0% (SAIF) of total asset shares and 37% (WPSF) and 0% (SAIF) of total asset shares and 54% (WPSF) and 0% (SAIF) of the total net cost of guarantees and 54% (WPSF) and 0% (SAIF) of the total net cost of guarantees and smoothing. These new model points have been rolled forward to 31 December 2006.

The Prudential Sourcebook guidance requires that the grouping of policies for valuing the cost of guarantees, options and smoothing should not materially misrepresent the underlying exposure. In particular policies with guarantees "in the money" should not be grouped with policies with guarantees well "out of the money". (The "moneyness" of guarantees describes the extent to which guarantees are biting for a policy.)

To meet this requirement WPSF (excluding Hong Kong) policies have been grouped together where they are subject to the same rate of bonus. This has been done by grouping policies separately for:

- Major product categories
- Single premium policies, regular premium policies, and paid-up policies
- Year of inception
- Year of maturity

To more accurately group specific product lines a number of additional fields are also utilised:

- For Prudence Bond: withdrawal option and duration since top-up
- For SAIF and PSA: age
- For Group Pensions and ex-SAL Personal Pensions: initial allocation, commission type and front-end commission
- For DWP Rebates: capital charge period

For with-profits annuities, age, sex and guaranteed term have been used as the only grouping variables.

Checks were performed to ensure that the model policies suitably reflected the underlying data. The ungrouped policy data and grouped model points were separately projected through the valuation models. Comparisons of revenue and balance sheet items over the projection period were produced to demonstrate that the model points represent the policy data adequately. The key check was to ensure that the run-off of asset share and fund value over the projection period were similar.

HKSALM model points are generated from a representative set of policies and scaled up to allow for non-modelled business.

- (2)(c) Approximations are necessary for WPSF IB business because IB bonus rates are derived from the corresponding OB bonus rates as a result of the bonus harmonisation undertakings given in 1988 when the assets of the two funds were merged. That is, IB bonus rates are 100% of the corresponding OB rates for new business issued since July 1988 and at least 90% for earlier business. The total liability is determined prospectively allowing for the expected OB-related bonuses, but the amount of this liability ascribed to guarantees and smoothing is approximate.
- (3) During 2006 PSALM has been enhanced to provide a more accurate split between the cost of guarantees and the cost of smoothing for With-Profit Immediate Annuities.

In addition, the following changes have been made to the assumed management actions, which are described in more detail in paragraph 6.(5)(a):

- the MVR-free limit has been increased from £15,000 to £25,000, and
- smoothing profits in the early years of the projection have been based on smoothing rules whereby claim values are assumed to change by up to ± 7% each year around an assumed growth rate of 8%.
- (4)(a) The following paragraphs describe the approach taken in respect of the options and guarantees valued using the PSALM model. The same asset model is used to generate the investment returns assumed in the Pension Mis-selling Reserve and Guaranteed Minimum Pension models. A similar approach is also taken for HKSALM.
- (4)(a)(i) For the WPSF and SAIF, the guarantees valued using the full stochastic model include sums assured and projected reversionary bonuses (including any minimum guaranteed rates of reversionary bonus) payable on death, maturity or vesting. For SAIF, guaranteed annuity options are also valued.

The extent to which guarantees are in or out of the money varies greatly across product lines and in particular by duration in force within each product line. The ratio of reversionary bonus funds to asset shares for separate AWP product lines ranged from 61% to 80%, averaging 73% overall for the WPSF and 71% overall for SAIF business.

#### (4).(a)(ii) The economic scenario generator

Economic scenarios are generated by the GeneSIS model. This is a risk neutral stochastic asset model. The models used for each asset class are as follows:

• Nominal interest rate model

The interest rate model is a Hull and White two-factor model. Current forward rates (the UK gilts instantaneous nominal forward curve) are used to define an initial yield curve. The short rate in the model is assumed to fluctuate around this initial curve. A second random process disturbs the initial curve to which the short rate reverts.

• Equity model

The equity return is generated using a risk-neutral lognormal model. It consists of a drift term and a random process. The drift term is the short rate taken from the nominal interest rate model described above. Equity returns fluctuate about this rate by means of a random process based on an annual volatility and a random number. The volatility assumption is time dependent. The process for dividends is designed to be consistent with the current dividend yield and tends to a defined long-term yield level, whilst being constrained by a total return on equities that is consistent with the risk-neutral framework.

• Corporate bond model

Corporate bond returns are modelled as a gilt return plus additional volatility. This is an approximation to the Merton model which suggests that the return on a corporate bond can be decomposed into the return on a risk-free bond and the return on a put option on the value of a firm.

• Property model

Property returns are modelled as a corporate bond (the lease) and an equity component (the residual price). Property effectively behaves like a lognormal process with annual volatility of 15%.

• Real interest rate and inflation model

Real interest rates are modelled using a one-factor Hull and White model. This model takes current forward rates (the UK gilts instantaneous real forward curve) to define an initial yield curve. The modelled interest rate is assumed to fluctuate around this initial curve. This fluctuation is correlated to the random variables used to derive nominal interest rates. The inflation rate is defined as the difference between the nominal and the real interest rate.

#### Calibration of asset model

The GeneSIS model has been calibrated to the market prices of traded derivative instruments as at 31 December 2006. The assumptions used in the calibration are:

• Risk free interest rate

The yield curve used to calibrate the nominal interest rate model is shown below:



The 2006 FY risk-free rate has been determined as 10 bp over the gilt rate, reflecting the decrease in yield on gilts arising from their repo abilities and other factors.

It has been assumed the parameters defining the fluctuation in modelled interest rates around this yield curve are obtained by calibrating the model to replicate observed swaption rates.

Equity volatility

For UK equities, total return option prices were obtained with exercise dates from 1 to 10 years, and for (forward) strikes  $K = \{0.8, 0.9, 1.0\}$ . The resulting volatility surface (based on moneyness and term) was converted into a structure dependent only on term through determining the moneyness of the policy guarantees. The average strike was 0.70 for the first ten years.



The resulting volatilities for UK equities are shown in the graph below:

Due to the geographical diversification, the returns on our overseas equities do not resemble any single overseas index on which market option prices can be obtained. Hence we have assumed that the internal experts' (Prudential Portfolio Management Group - PMG) long-term assumption (16%) holds at all durations. The lower volatility assumption than on the UK equity portfolio reflects the geographic diversification.

For periods over 15 years, market observation is not possible and we have assumed 20% volatility for UK equities and 16% for overseas.

The final volatility term structure is shown in the graph below:



• Corporate bonds

The annualised additional volatility over the gilt return for corporate bonds was 2.51%. This volatility was determined from a historical index of corporate bond returns.

• Property

Property returns were decomposed into a corporate bond return plus the value of upward only rent increases. Due to scarcity of market data and the serial correlation of published indices, the property parameters were based on expert opinion.

• Real interest rates

The model was calibrated using 5 years of real forward rates data, instantaneous nominal forward rates for 25 years and the RPI inflation rate as at December 2006.

• Correlations

Correlations between asset classes have been determined based on internal expert opinion and analysis of historical values. The correlations implied by the economic scenarios generated for the valuation are as follows:

	Cash	Corporate Bonds	UK Equities	Overseas Equities	Property
Cash	100%	15%	3%	4%	4%
<b>Corporate Bonds</b>	15%	100%	27%	17%	27%
UK Equities	3%	27%	100%	50%	39%
OS Equities	4%	17%	50%	100%	29%
Property	4%	27%	39%	29%	100%

- (4)(a)(iii) The asset model was used to value the required example options. The same table applies to WPSF UK and SAIF liabilities. The results are set out in Appendix 6.
- (4)(a)(iv) The initial and long-term yields assumed for assets backing WPSF UK and SAIF liabilities are shown below:

	31 Dec	ember 2006	31 December 2005	
	UK	Overseas	UK	Overseas
	%	%	%	%
Equity dividend yield				
Current	3.07	2.13	3.09	2.03
Long term	3.25	2.50	3.25	2.50
Property rental yield				
Current	5.50	N/A	5.25	N/A
Long term	6.75	N/A	6.25	N/A

All overseas territories for the UK business are treated together; we do not isolate significant territories within these.

(4)(a)(v) When expressed in sterling, the entries would be the same as for UK assets.

	31 Decem	<b>31 December 2006</b>		
Product	Proportion of total RB guarantee	Duration		
	%	Years		
WPSF Pru Bond and PSA	15	15		
WPSF OB/IB	10	6		
WPSF Personal	15	20		
Pensions				
WPSF PPRP	35	13		
WPSF Group	12	17		
Pensions				
With Profit	1	12		
Annuities				
SAIF	9	15		
Total	97	N/A		

(4)(a)(vi) A table of the outstanding mean durations of reversionary bonus claims for material products is:

A check of the model was carried out to calculate the (Monte Carlo) prices of the equity put options, after calibrating to a moneyness of 0.7 in order to be consistent with the market prices for Strike = 80% ATM forward. The results are shown below and demonstrate that the GeneSIS model is capable of reproducing market prices.

Term (yrs)	Strike (ATM forward)	Market Price (%)	GeneSIS Price (%) k = 0.80
Strike = 80% of ATM	1 forward	I	
1	4837.42	1.16%	1.198%
2	5111.88	2.71%	2.739%
3	5395.68	4.18%	4.189%
4	5685.02	5.56%	5.632%
5	5980.14	6.80%	7.024%
6	6285.05	7.87%	7.929%
7	6591.51	8.82%	8.890%
8	6905.44	9.65%	9.755%
9	7227.10	10.44%	10.619%
10	7558.44	11.15%	11.352%

- (4)(a)(vii) The model reproduces the current asset values for a wide range of securities, equity options and swaptions when the future income, gains and losses are projected and discounted to the valuation date.
- (4)(a)(viii) The PSALM model projects 5000 scenarios over 40 years. We have demonstrated that this produces statistically credible results, both using statistical theory and empirically by running the model several times on randomly different sets of economic scenarios and demonstrating that the results are materially close.
- (4)(b) Not applicable
- (4)(c) Not applicable

(5)(a) For the WPSF UK business and SAIF, modelled management decisions are consistent with the Principles and Practices of Financial Management (PPFM) available to the public, and with the Financial Condition Reports submitted annually to the PAC Board. Details are given for UK business; a similar approach is used for the Hong Kong business.

In practice, a range of management actions would be considered at any time of stress. The actions taken would depend on the economic outlook and the financial position of the fund at that time. The stochastic model cannot reflect all possible actions and so it includes assumptions to broadly reflect the likely decisions. The assumptions made, as described below, are therefore indicative of the actions that might be taken in practice.

The results are sensitive to the bonus, MVR and investment policy the company employs. The annual bonuses and investment mix are dynamically modelled in PSALM stochastic projections. Dynamic management actions are assumed to depend on the PAC solvency position during the projection. For this purpose a PAC solvency ratio is calculated as (assets/regulatory liability -1) for the combined with-profits funds. Two ratios are calculated either including or excluding the cost of personal pension mis-selling costs (accumulated past and potential future costs, run-off in line with relevant policy asset shares) as an additional asset.

Paragraphs (5)(a)(i) to (5)(a)(vi) below set out the key management actions assumed.

(5)(a)(i) Reversionary bonuses (RB)

The following rules are assumed for WPSF business:

- The RB rates shown in Appendix 7 are assumed to apply when the solvency ratio (excluding the cost of personal pension mis-selling) is at or above 8%.
- If (on the RB declaration month) the solvency level is below 8%, then RB rates are reduced by 50%. If solvency recovers back above 8% then RB rates are assumed to revert back to their original level.

The following rules are assumed for SAIF business:

- The RB rates shown in Appendix 7 are assumed to apply when the solvency ratio (including the cost of personal pension mis-selling) is at or above 16.6%.
- If (on the RB declaration month) the solvency ratio is below 8.3%, SAIF RB rates are assumed to reduce by 90%. Between 16.6% and 8.3% solvency, SAIF RB rates are reduced linearly. When the solvency ratio rises above 16.6%, RB rates return to their previous levels.
- If the WPSF RB rates have been cut by 50%, the SAIF RB rates derived above are also assumed to reduce by a further 50%.

## (5)(a)(ii) Smoothing rules

Smoothing costs are determined in line with expected company practice to the extent that this can be modelled (given the practical constraints of stochastic modelling).

The stochastic asset liability model does not hold specific final bonus rates; instead the approach used is to determine:

- the opening claim values by applying a ratio of claim value to asset share to each model point asset share, and
- all future claim values as equal to asset shares, subject to the smoothing of claim values and the reversionary bonus underpin (where applicable).

The smoothed claim value between year ends is determined by accumulating the previous year-end claim value at a long term rate of return (which is 6% pa for WPSF AWP business, before charges). The yearly reviews adjust the claim value to the asset share, subject to the revised claim value:

- being limited to a range of values around the current claim value (e.g. ± 5% for WPSF AWP business),
- for the WPSF business moving at least one third of the way up or down to asset share, where this leads to a larger adjustment. For SAIF the corresponding limits are 25% up or one third of the way down to asset share, and
- being at least equal to the RB fund (where the RB underpin is applicable).

At 31 December 2006 the application of the rules described above resulted in smoothing profits in the early years of the projection that were larger than would be expected in practice. To correct for this, the smoothing rules for AWP business were modified in the first four years so that claim values were assumed to change by up to  $\pm$  7% each year around an assumed growth rate of 8%.

In the RCM scenario, the long-term investment return reduces in line with the interest rate event. Claim values would then generally change by up to 5% each year around a reduced long-term growth rate of 5%. It is also assumed that the WPSF and SAIF smoothing limits would be widened to allow claim values to move 50% of the way down to asset share in any one year.

(5)(a)(iii) Market value reductions (MVRs)

In the base valuation, it is assumed that a £25,000 MVR-free limit would be applied to all AWP business in the sixth and subsequent policy years, reflecting current practice.

In the RCM scenario, a £10,000 MVR-free limit is assumed.

#### (5)(a)(iv) Asset re-balancing and switching

The asset allocations are assumed to be re-balanced on an annual basis towards the long-term benchmark asset allocation. There is no assumed limit on the maximum amount that can be re-balanced in any month.

In addition to rebalancing, asset switching (pro rata from UK and overseas equities into corporate bonds) is triggered when the solvency ratio falls below 6%. The amounts to be switched are determined as follows:

- At 6% solvency or above, UK and overseas equities are assumed to remain at their long-term benchmark proportions (if switching has not yet taken place). If switching has already taken place in the model, switching from corporate bonds back into equities (in order to return to the long-term benchmark) can only occur when solvency rises above 8%.
- At 2.5% solvency, UK and overseas equities are assumed to be fully switched into corporate bonds.
- Between 6% and 2.5% solvency, the required switch amount is determined by linear interpolation between the limits specified above.

The maximum amount that can be switched in any month is 2% of total assets.

The SAIF asset allocation is assumed to be the same as PAC but with around 6% more corporate bonds (and around 6% less in other assets).

The property portfolio is assumed to be illiquid over the short term, so no switching of property assets occurs in the model.

(5)(a)(v) Tax on shareholders' transfers

If the PAC solvency level (excluding the cost of personal pension mis-selling) is above 8%, tax on shareholders' transfers is assumed to be paid from the WPSF's free assets.

(5)(a)(vi) Operation of SAIF

PSALM contains rules to model the SAIF Principles of Financial Management. As well as the rules set out above, this includes:

- recalculating the enhancement factor applied to SAIF asset shares, with the intention of distributing all SAIF assets (including future profits arising in SAIF) to SAIF policies, and
- merging SAIF into the WPSF when SAIF assets (including the bonus smoothing account but excluding SACF) fall below £1bn, increased in line with RPI from the date of the agreement (1997).

(5)(b) The proportion of equities and level of reversionary bonus rates after 5 and 10 years are shown below, projected by the PSALM model assuming various specific constant rates of return.

Year	Rate of return	Equity proportion		Proportion of initial annual bonus rate		
		PAC	SAIF	PAC	SAIF	
LIFE	%	%	%	%	%	
Current	n/a	55.7	52.9	100	100	
5 years	5.01	55.4	52.1	100	100	
10 years	4.74	55.4	52.1	100	100	
PENSIONS	%	%	%	%	%	
Current	n/a	55.7	52.9	100	100	
5 years	5.01	55.4	52.1	100	100	
10 years	4.74	55.4	52.1	100	100	

(i) Based on forward rates derived from the risk free interest rate curve

(ii) Based on forward rates plus 17.5% of the long-term gilt yield

Year	Rate of	Equity proportion		Proportion of initial RB		
	return			rate		
		PAC	SAIF	PAC	SAIF	
LIFE	%	%	%	%	%	
Current	n/a	55.7	52.9	100	100	
5 years	5.92	55.4	52.1	100	100	
10 years	5.59	55.4	52.1	100	100	
PENSIONS	%	%	%	%	%	
Current	n/a	55.7	52.9	100	100	
5 years	5.92	55.4	52.1	100	100	
10 years	5.59	55.4	52.1	100	100	

(iii) Based on forward rates less 17.5% of the long-term gilt yield

Year	Rate of	Equity proportion		Proportion of initial RB		
	return			rate		
		PAC	SAIF	PAC	SAIF	
LIFE	%	%	%	%	%	
Current	n/a	55.7	52.9	100	100	
5 years	4.12	55.4	52.1	100	100	
10 years	3.90	55.4	52.1	100	100	
PENSIONS	%	%	%	%	%	
Current	n/a	55.7	52.9	100	100	
5 years	4.12	55.4	52.1	100	100	
10 years	3.90	55.4	52.1	100	100	

The initial reversionary bonus rates are shown in Appendix 7.

(6) For SAIF guaranteed annuity options, modelled in PSALM, no decrements are assumed in deferment and 10% of the annuity is assumed to be taken as cash (i.e. the guarantee cost applies only to the remaining 90%). Due to constrained information on the age at vesting and the nature of the annuity, GAO costs are calculated using an annuity certain of 22 years.

Product	Decrement						
			policy	years			
		1-5	6-10	11-15	16-20		
CWP savings endowment	surrender	8.06	3.02	1.26	1.26		
CWP target cash endowment	surrender	8.06	3.02	1.26	1.26		
UWP savings endowment	surrender	N/A	N/A	N/A	N/A		
UWP target cash endowment	surrender	N/A	N/A	N/A	N/A		
UWP bond	surrender	3.69	11.52	7.65	7.65		
UWP bond	automatic withdrawals	0.00	0.00	0.00	0.00		
CWP pension regular premium	PUP	3.15	3.60	2.70	2.70		
CWP pension regular premium	surrender	1.35	1.35	1.35	1.35		
CWP pension single premium	surrender	0.90	0.90	0.90	0.90		
UWP indiv pension regular premium	PUP	8.55	6.75	4.50	4.50		
UWP indiv pension regular premium	surrender	3.15	3.15	3.15	3.15		
UWP indiv pension single premium	surrender	2.70	2.70	2.70	2.70		

A summary of the decrement assumptions is shown in the table below:

(7)

It is assumed that in extreme market scenarios, the group actions of policyholders would serve to increase the costs of guarantees and smoothing. This is modelled by assuming that decrement rates will be 10% lower than our current best estimate. The same assumptions are used in both the base valuation and the RCM.

## 7. Financing costs

Not applicable

## 8. Other long-term insurance liabilities

No liabilities are shown at line 46 of Form 19.

Liabilities shown at line 47 of Form 19 are as follows:

<u>With-profits</u> <u>fund</u>	Description	<u>Amount</u> <u>£m</u>
WPSF	The tax payable from the estate in respect of future shareholder transfers from the fund	879
	Pensions mis-selling liabilities	401
	Reserve for compensation in respect of complaints on mortgage endowment policies	60
	Contingencies	100
	Other	74
SAIF	SACF capital support fee	134
	Reserve for compensation in respect of complaints on mortgage endowment policies	45
	Other	31
DCPSF	The value of the Capital Support content of the annual fund charge	30

"Other" comprises various miscellaneous reserves for mis-selling, compensation payable for administration errors, and other liabilities not provided for elsewhere in either the with-profits benefits reserve or future policy related liabilities.

#### 9. Realistic current liabilities

Regulatory current liabilities comprise two elements:

- (i) a provision for the capital gains tax (CGT) expected to be paid on unrealised investment gains, and
- (ii) other current liabilities, as reported within Form 14 lines 17 to 41.

The realistic current liabilities shown at line 51 of Form 19 are the same as the regulatory current liabilities except that:

- (a) the unrealised CGT provision is determined assuming a discounted CGT rate of 18.5% rather than the undiscounted rate of 20%, and
- (b) the realistic current liabilities include cash bonuses which had not been paid to policyholders prior to the end of the financial year (as shown at Form 14 line 12).

The reconciliation of realistic to regulatory current liabilities is shown below:

	WPSF	SAIF	DCPSF
	£m	£m	£m
Regulatory CGT provision	1,852	229	-
Less: Impact of discounting	(139)	(17)	-
Realistic CGT provision	1,713	212	-
Other Form 14 current liabilities	1,721	400	1
Unpaid cash bonuses (Form 14 line 12)	1	-	-
Realistic current liabilities	3,436	612	1

#### 10. Risk capital margin

(a) The risk capital margin is £1,818m for the WPSF (plus the DCPSF) and zero for SAIF.

This has been calculated assuming:

(i) a percentage change in market values, in accordance with INSPRU 1.3.68R, of 20.0% for equities and 12.5% for real estate. The assumed percentage changes for each significant territory were the same as for United Kingdom assets. A fall in market values is the more onerous.

(ii) a change in the yields of United Kingdom fixed interest securities of 81 bps. For significant territories, the assumed change in yields is 81 bps for the United States and 71 bps for the member states of the European Union that have adopted the euro as their official currency ("euroland"). A fall in yields is the more onerous. The assumed longterm gilt yields or nearest equivalent are shown below:

Territory	Long-term gilt yield	Long-term gilt yield
	in base valuation	in RCM
	%	%
UK	4.62	3.81
USA	4.62	3.81
euroland	4.06	3.35

- (iii) in respect of credit risk, average changes in spreads and consequent changes in asset values as follows:
  - (a) for bonds issued or guaranteed by an organisation which is a credit risk scenario exempt organisation in accordance with INSPRU 1.3.87R, no credit stress is applied. For other bonds, spreads are assumed to increase on average by 74 basis points (WPSF and DCPSF) and by 66 basis points (SAIF). Asset values (including those in respect of credit risk scenario exempt organisations) fall overall by 5.0% (WPSF and DCPSF) and by 4.4% (SAIF).
  - (b) for debts, it is assumed that spreads increase on average by 146 basis points and asset values fall overall by 13.4%.
  - (c) reinsurance credit risk is covered by the inclusion of a liability of £2.5m.
  - (d) no change is assumed for non-reinsurance financing agreements. These are not considered to present a significant credit risk.
  - (e) for other debtors reported in lines 78 and 79 of Form 13, it is assumed that asset values fall overall by 1.0%.
- (iv) The impact of the persistency risk scenario is equivalent to an increase in the realistic value of liabilities of 0.6% for the WPSF and 0.2% for SAIF.
- (v) that any change in asset values in (iii) is independent of the change in liability values in (iv).
- (b) (i) For the WPSF and SAIF, the following management actions are assumed in addition to those stated in 6.(5)(a) above:
  - The assumed MVR-free limit is £10,000 (compared with £25,000 in the base valuation).
  - For UK business, reversionary bonuses for life policies are reduced to 75% of the long term supportable rates at the next declaration. Reversionary bonus rates for pensions policies remain at 100% of long term supportable rates. See bonus table in Appendix 7.
  - For Hong Kong business, reversionary bonuses are reduced to 75% of the current rates at the next declaration.

• It is also assumed that we would widen the WPSF's smoothing limits to allow claim values to move 50% of the way down to asset share in any one year.

For the DCPSF it is assumed that claim payouts will be reduced to a level so that, over the outstanding term of the in-force business, aggregate asset shares will be sufficient to meet claims and expenses.

(ii) The table below shows the impact of management actions and assumption changes on the risk capital margin

	RCM with standard management actions	RCM with additional management actions	RCM with additional assumptions
WPSF & DCPSF	2,830	1,818	1,818
SAIF	0	0	0

- (iii) If the actions and assumptions listed above in section (b)(i) were included with those disclosed in 6(5)(a) the effect on the tables in 6(5)(b) would be as follows:
  - the equity proportions would be unchanged,
  - the proportions of the initial annual bonus rates for life business would be 75%, and
  - the proportions of the initial annual bonus rates for pensions business would remain at 100%.
- (iv) The requirements of INSPRU 1.3.188 R would be met if the management actions and assumptions described in 10.(b)(i) were integrated into the projection of assets and liabilities and thus disclosed in 6.(5)(a).
- (c) (i) For PAC, the assets allocated to support the WPBR, FPRL and the reserve for unrealised capital gains reflect the actual asset mix of the with-profits fund, while current assets are used to support current liabilities. The RCM is backed by surplus fixed interest, property and other assets.
  - (ii) For the WPSF and SAIF none of the assets held to cover the risk capital margin are outside the respective fund. For the DCPSF the assets backing the RCM are held in the WPSF.

## 11. Tax

The treatment of tax is set out below.

- (i) The investment returns credited to the with-profits benefits reserves include an allowance for tax deducted during 2006 at the rates shown below. Further adjustments may be made from time to time to bring the tax charged to asset shares into line with the aggregate tax actually paid and expected to be paid in the future. Tax on shareholders transfers is not currently deducted from asset shares.
- (ii) The future policy related liabilities include allowance for tax on future investment returns and tax relief on expenses at current rates of tax allowing for any likely deferral of tax on capital gains, as shown in the table below.

(iii) The realistic current liabilities include a reserve for unrealised capital gains which is the regulatory reserve except that a discounted rate of 18.5% rather than 20% is applied.

TAX RATES	WPSF and SAIF #
Source	Tax Rate
Franked Investment Income	0.0%
Unfranked Investment Income (FI and cash)	20.0%
Unfranked Investment Income (property)	20.0%
Capital Gains	18.5%
Initial Expense Relief	15.0%
Renewal Expense Relief	20.0%
Shareholder Transfers (gross business)	43.0%
Shareholder Transfers (net business)	10.0%

# Tax is not applied to pensions or DCPSF business other than in respect of tax on shareholders' transfers from the WPSF.

## 12. Derivatives

The WPSF and SAIF hold:

- Exchange traded equity index futures in the following markets: UK, US and Europe. They also hold exchange traded fixed income futures in the UK, Europe and US markets. All positions are used to reflect tactical asset allocation (short term) views around the strategic (long term) benchmark.
- Forward currency contracts primarily to hedge currency risk arising from US and European bond exposures, but also to implement tactical asset allocation positions.
- Over-the-counter (OTC) equity single stock options to increase the equity exposure of the convertible bond sub-fund.
- OTC fixed income derivatives positions to convert floating rate assets into fixed rate assets.
- OTC total return swaps based on the IPD Annual All Property index to adjust tactically the fund's exposure to property.
- SAIF holds OTC swaptions to partially hedge its guaranteed annuity liabilities.

# 13. Analysis of change in working capital

	WPSF	SAIF
	£m	£m
Working capital at 1 January 2006	7,979	0
Reversal of zeroisation by closed funds	-	697
Working capital at 1 January 2006 prior to zeroisation	7,979	697
Assets:		
Net investment return on opening working capital (excluding PAL)	901	59
Return on PAL	(6)	0
Increase in inadmissible assets	(226)	(66)
Impact of non-profit business	(64)	(97)
Change in cost of guarantees, options, and smoothing:		
2006 economic experience (investment return)	397	205
2006 non-economic experience	(50)	41
Economic assumption changes	417	206
Non-economic assumption changes	(79)	(46)
Other:		
Opening adjustments	(60)	0
Impact of new business	(49)	0
Impact of allowance for pension scheme deficit	(37)	0
Increase in provision for tax on future shareholder transfers	(118)	0
SAIF miscellaneous surplus allocated to asset shares	0	(31)
Increase in contingency reserve	(100)	0
Increase in other reserves	(189)	13
Other	(97)	(82)
Working capital at 31 December 2006 prior to zeroisation	8,619	899
Zeroisation by closed funds	-	(899)
Working capital at 31 December 2006	8,619	0

# 14. Optional disclosure

Not applicable

# Appendix 6

- 1	A a a a t to m -	K=0.75					K-1				K-1 5			
	Asset type		15	25	35	K=1	15	25	25	K=1.5	15	25	25	
n r	Annualised compound equivalent of the risk free rate assumed for the period. (to two decimal places)	5 5.14%	4.64%	4.26%	4.02%	5 x	15 x	25 x	35 x	5 x	15 x	 X	35 x	
1	Risk-free zero coupon bond	778,110	506,017	351,430	250,186	x	x	x	x	x	x	x	x	
2	FTSE All Share Index (p=1)	62,537	159,067	240,985	303,728	180,591	304,017	403,111	477,624	554,853	674,509	782,411	868,663	
3	FTSE All Share Index (p=0.8)	50,662	114,783	162,933	193,378	153,342	227,239	280,241	311,632	493,333	525,973	563,946	584,354	
4	Property (p=1)	31,346	103,172	166,172	219,647	133,137	235,376	314,792	379,990	524,964	606,897	688,310	760,615	
5	Property (p=0.8)	23,666	67,092	101,445	125,940	107,447	163,053	200,781	226,693	460,147	455,553	471,053	482,766	
6	15 year risk free zero coupon bonds (p=1)	1,577	3,624	5,645	18,459	61,357	71,503	78,229	108,086	499,937	499,654	500,436	506,447	
7	15 year risk free zero coupon bonds (p=0.8)	660	422	325	2,295	38,971	22,184	13,909	20,662	428,445	317,603	238,752	200,089	
8	15 year corporate bonds (p=1)	2,205	8,250	15,201	34,639	65,102	87,818	106,044	139,538	502,576	507,914	516,837	533,015	
9	15 year corporate bonds (p=0.8)	916	1,595	2,000	5,924	42,159	33,845	28,875	37,818	431,228	329,219	264,006	233,467	
10	Portfolio of 65% FTSE All Share and 35% property (p=1)	37,360	113,773	182,841	238,214	143,573	247,627	332,673	401,001	528,837	616,294	704,730	782,628	
11	Portfolio of 65% FTSE All Share and 35% property (p=0.8)	28,385	75,859	114,921	140,170	117,404	175,095	218,356	245,496	464,614	466,442	488,030	503,952	
12	portfolio of 65% equity and 35% 15 year risk free zero coupn conds (p=1)	21,710	77,791	133,412	180,483	118,147	200,280	271,696	330,520	514,287	569,641	638,109	699,972	
13	portfolio of 65% equity and 35% 15 year risk free zero coupn conds (p=0.8)	15,203	46,783	75,454	95,674	93,003	132,465	165,218	186,997	447,515	416,724	422,614	428,141	
14	Portfolio of 40% equity, 15% property, 22.5% 15 year risk free zero coupon bonds and 22.5% 15 year corporate conds (p=1)	9,414	45,067	86,828	125,659	90,958	154,433	211,976	263,522	504,994	534,249	581,262	631,402	
15	Portfolio of 40% equity, 15% property, 22.5% 15 year risk free zero coupon bonds and 22.5% 15 year corporate conds (p=0.8)	5,756	22,507	41,050	57,160	66,778	90,963	114,157	131,324	435,789	374,457	360,707	358,228	
		L=15				L=20				L=25				
16	Receiver swaptions	8.15%	9.68%	7.97%	6.03%	10.80%	12.03%	9.71%	7.35%	13.19%	13.96%	11.14%	8.44%	

# Appendix 7

Initial reversionary bonus assumptions in stochastic valuation.

	2006 (Feb 2006	Assumed 200	7 and thereafter
	declaration)	Base case	<b>RCM Scenarios</b>
Life & Pensions	, , , , , , , , , , , , , , , , , , ,		
1. PSA/PIB	3.25	3.25	2.50
2. Personal Pensions	3.25	3.50	3.50
3. OB assurances	1.0/2.0	1.0/2.0	0.9/2.0
4. IB assurances	0.9/1.8	0.9/1.8	0.8/1.8
5. PPRP	0.25/0.50	0.35/0.60	0.35/0.60
Annuities			
6. Annuities	2.75	3.00	3.00
7. Flexible Retirement Income Account	2.75	2.75	2.75
Corporate			
8. Unitised	3.50	3.75	3.75
9a. DC Cash Accumulation	3.00*	3.25*	3.25*
9b. DB Cash Accumulation	2.75*	3.00*	3.00*
10. AVC Cash Accumulation	3.00*	3.25*	3.25*
11. Group Personal Pension	3.50	3.75	3.75
12. Pension Savings Plan	2.50	2.75	2.75
IFA			
13. Prudence Bond			
- Standard	3.25	3.25	2.50
- High RB	4.00	4.00	3.00
- Prospect – Standard	2.85	2.85	2.25
- Prospect – High RB	3.60	3.60	2.75
14. Prudential Pensions	3.25	3.50	3.50
15. SAL Life	3.00	3.00	2.25
16. SAL ISA	N/a	N/a	N/a
17. SAL Pensions			
- Funds 5, 6	3.375	3.625	3.625
- Funds 7, 8	3.25	3.50	3.50
SAIF			
18. Principal Endowment	0.80/1.50	1.30/2.30	0.90/1.60
19. Flexidowment (series 2)	0.70/1.70	1.00/2.60	0.70/1.80
20. Flexisave (series 2)	0.70/1.30	1.00/2.10	0.70/1.40
20. Flexibersion (series 1)	0.40/1.00	0.70/1.60	0.70/1.40
22. Superannuation	0.40/1.00	0.70/1.60	0.70/1.60
23. Group	1.10	1.70	1.70
24. Life	2.00	3.50	2.75
25. Pensions – Fund 1	4.00	4.25	4.25
26. Pensions – Fund 2	4.00	4.23	4.23
27. Pensions – Funds 3 & 4	2.25	4.25	4.25

\* Subject to a guarantee of 4.75% for certain earlier business

# Appendix 8

The tables below show the Reversionary Bonus (RB) rates and the Terminal Bonus (TB) as a proportion of the Sum Assured.

<b>OB</b> Assurances
----------------------

Reversionary Bonus Rates						
2005 Actual 2006 2007 Ultimate						
RB on SA	1.0%	1.0%	1.0%	1.0%		
RB on RB	2.0%	2.0%	2.0%	2.0%		

	TB as a proportion of Sum Assured							
Term	2005	2006	2007	2008	2009			
10	13%	20%	25%	35%	37%			
15	36%	41%	45%	48%	49%			
20	52%	71%	79%	87%	88%			
25	106%	110%	122%	114%	109%			
30	286%	280%	262%	214%	178%			

## **PPRP Regular Premium**

Reversionary Bonus Rates						
2005 2006 2007 Ultimate						
RB on SA	0.25%	0.25%	0.25%	0.25%		
RB on RB	0.50%	0.50%	0.50%	0.50%		

	TB as a proportion of Sum Assured								
Term	2005	2006	2007	2008	2009				
10	9%	6%	10%	15%	16%				
15	23%	15%	22%	19%	21%				
20	18%	20%	39%	46%	45%				
25	52%	18%	31%	31%	29%				
30	192%	149%	145%	105%	79%				

# **PPRP Single Premium**

Reversionary Bonus Rates						
2005 Actual 2006 2007 Ultimate						
RB on SA	0.25%	0.25%	0.25%	0.25%		
RB on RB	0.50%	0.50%	0.50%	0.50%		

TB as a proportion of Sum Assured							
Term	2005	2006	2007	2008	2009		
10	14%	5%	7%	7%	8%		
15	13%	14%	28%	51%	48%		
20	67%	47%	46%	34%	30%		
25	196%	166%	186%	155%	103%		
30	334%	276%	293%	298%	286%		

## **PP Regular Premium**

Reversionary Bonus Rates					
	2005 actual	2006	2007	2008	Ultimate
RB rate	3.25%	3.25%	3.25%	3.25%	3.25%

TB as a proportion of Sum Assured							
Term	2005	2006	2007	2008	2009		
10	7%	12%	16%	19%	20%		
15	16%	21%	24%	26%	27%		