Registered Number 48340

Legal & General Reinsurance Company Limited Report and Accounts 2024

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KPMG Audit Limited

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#### INDEPENDENT AUDITOR'S REPORT

### To the Shareholder and Board of Directors of Legal & General Reinsurance Company Limited

## **Opinion**

We have audited the financial statements of Legal & General Reinsurance Company Limited (the "Company") which comprise the statement of financial position as at December 31, 2024, the statements of comprehensive income, changes in equity and cash flows for the year then ended, and notes, comprising material accounting policies and other explanatory information.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Company as at December 31, 2024, and its financial performance and its cash flows for the year then ended in accordance with IFRS Accounting Standards as issued by the International Accounting Standards Board ("IFRS Accounting Standards")

## Basis for opinion

We conducted our audit in accordance with International Standards on Auditing ("ISAs"). Our responsibilities under those standards are further described in the "Auditor's responsibilities for the audit of the financial statements" section of our report. We are independent of the Company in accordance with International Ethics Standards Board for Accountants International Code of Ethics for Professional Accountants (including International Independence Standards) ("IESBA Code") together with the ethical requirements that are relevant to our audit of the financial statements in Bermuda, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Responsibilities of management and those charged with governance for the financial statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with IFRS Accounting Standards, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Company's financial reporting process.

## Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.



As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are
  appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the
  Company's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

**Chartered Professional Accountants** 

KPMG Audit Limited

Hamilton, Bermuda April 29, 2025

# **Statement of Comprehensive Income** For the year ended 31 December 2024

	Notes	2024 £m	2023 £m
Insurance revenue Insurance service expenses	1E/14 1G/14	973 (742)	916 (625)
Insurance service result Investment return Finance expense from insurance contracts issued Change in investment contract liabilities	1F/3 3	231 61 (32) 2	291 61 (111) (8)
Insurance and investment result		262	233
Other operational expenses Other expenses	4 5	(7) (11)	(2) (9)
Total other expenses		(18)	(11)
Profit before tax		244	222
Total tax income/(expense)	7	(2)	334
Profit for the year		242	556
Items that may be reclassified subsequently to profit or loss Insurance finance income for insurance contracts issued-OCI	14	-	2
Total Comprehensive Income		242	558

# **Statement of Financial Position** As at 31 December 2024

	Notes	2024 £m	2023 £m
Assets			
Financial investments	1D/9	1,494	1,412
Insurance contract assets	1C/14	-	9
Deferred tax assets	1K/11	336	336
Receivables and other assets		74	74
Cash and cash equivalents	11/12	19	12
Total assets		1,923	1,843
Equity			
Share capital	13	300	300
Capital redemption and other reserves		219	219
Retained earnings		751	739
Total equity		1,270	1,258
Liabilities			
Insurance contract liabilities	1C/14	538	480
Investment contract liabilities	15	13	22
Current tax liabilities	7	2	2
Payables and other financial liabilities	17	100	81
Total liabilities		653	585
Total equity and liabilities		1,923	1,843

The Notes on pages 8 to 50 are an integral part of these financial statements.

The financial statements on pages 4 to 7 were approved by the Board of Directors on 28 April 2025 and were signed on their behalf by:

T Stedman

Chairperson

N Rajkumar Director

Mmol Raykumar

DocuSigned by:

A Ellison Director

# **Statement of Changes in Equity**

For the year ended 31 December 2024	Notes	Share capital £m	Capital redemption reserves £m	Other reserves <sup>1</sup> £m	Retained earnings £m	Total equity £m
As at 1 January 2024		300	220	(1)	739	1,258
Profit for the year		-	-	-	242	242
Total Comprehensive Income for the year		-	-	-	242	242
Dividends	8	-	-	-	(230)	(230)
As at 31 December 2024		300	220	(1)	751	1,270
For the year ended 31 December 2023	Notes	£m	£m	£m	£m	£m
As at 1 January 2023		300	220	(3)	362	879
Profit for the year Other Comprehensive Income		-	-	- 2	556 -	556 2
Total Comprehensive Income for the year		-	-	2	556	558
Dividends	8	-	-	-	(179)	(179)
As at 31 December 2023		300	220	(1)	739	1,258

<sup>&</sup>lt;sup>1</sup> Other reserves include insurance finance reserves.

# **Statement of Cash Flows** As at 31 December 2024

	Notes	2024 £m	2023 £m
Cash flows from operating activities			
Profit for the year		242	556
Adjustments for non-cash movements in net profit for the year			
Net gains on financial investments		(11)	(8)
Investment income		(50)	(53)
Tax expense/(income)	7	2	(334)
Other adjustments		6	` 1 <sup>°</sup>
Net (increase)/decrease in operational assets			
Investments mandatorily measured at fair value through profit or loss		6	(42)
Investments measured at amortised cost		(56)	-
Other assets		(6)	213
Net (decrease)/increase in operational liabilities			
Insurance contracts		67	15
Investment contracts		(9)	(203)
Other liabilities		17	(8)
Cash generated from operations		208	137
Interest received		1	3
Dividends received		28	26
Net cash flows from operations		237	166
Cash flows from financing activities			
Dividend distributions to ordinary equity holders during the year	1H/8	(230)	(179)
Net cash flows utilised in financing activities		(230)	(179)
Net (decrease)/increase in cash and cash equivalents		7	(13)
Cash and cash equivalents at 1 January		12	25
Total cash and cash equivalents at 31 December	11/12	19	12

# 1. Summary of significant accounting policies

## A Basis of preparation

The Company's financial statements have been prepared in accordance with IFRS Accounting Standards as issued by the International Accounting Standards Board (IASB).

The Company has selected accounting policies which state fairly its financial position, financial performance and cash flows for a reporting period. The accounting policies have been consistently applied to all years presented unless otherwise stated.

Financial assets and financial liabilities are disclosed gross in the Statement of Financial Position unless a legally enforceable right of offset exists and there is an intention to settle recognised amounts on a net basis. Income and expenses are not offset in the Statement of Comprehensive Income unless required or permitted by any accounting standard or International Financial Reporting Interpretations Committee (IFRIC) interpretation, as detailed in the applicable accounting policies of the group.

#### **Going Concern**

The Company's business activities, together with the factors likely to affect its future development, performance and position in the current economic environment are set out in this Company's financial statements, the financial position of the Company, its cash flows, liquidity position and borrowing facilities are described in these financial statements. Principal risks and uncertainties are detailed in Note 22.

The Board of Directors have made an assessment of the Company's going concern, considering both the current performance and the outlook for a period of at least, but not limited to, 12 months from the date of approval of these financial statements, using the information available up to the date of issue of these financial statements.

The Company manages and monitors its capital and liquidity, and applies various stresses, including adverse inflation and interest rate scenarios, to those positions to understand potential impacts from market downturns. Our key sensitivities and the impacts on our capital position from a range of stresses are disclosed in Note 22. These stresses do not give rise to any material uncertainties over the ability of the Company to continue as a going concern. Based upon the available information, the Board of Directors consider that the Company has the plans and resources to manage its business risks successfully and that it remains financially strong and well diversified.

Having assessed the principal risks and uncertainties (both financial and operational) in light of the current economic environment, as detailed in Note 22, the Board of Directors are confident that the Company will have sufficient funds to continue to meet its liabilities as they fall due for a period of, but not limited to, 12 months from the date of approval of the financial statements and therefore have considered it appropriate to adopt the going concern basis of accounting when preparing the financial statements.

#### New standards, interpretations and amendments to published standards that have been adopted by the Company

The Company has applied the following amendments for the first time in its annual reporting period commencing 1 January 2024, which did not have a material impact on its financial statements:

- Amendments to IAS 1 Presentation of Financial Statements: 'Classification of Liabilities as Current or Non-Current';
- Amendments to IAS 1 Presentation of Financial Statements: 'Non-current Liabilities with Covenants';
- Amendments to IFRS 16 Leases: 'Lease Liability in a Sale and Leaseback'; and
- Amendments to IAS 7 Statement of Cash Flows and IFRS 7 Financial Instruments: Disclosures: 'Supplier Finance Arrangements'.

The Company has not early adopted any standard, interpretation or amendment that has been issued but is not yet effective.

### Standards, interpretations and amendments to published standards which are not yet effective

### Amendments to IAS 21, 'The Effects of Changes in Foreign Exchange Rates': 'Lack of Exchangeability'

These amendments, issued In August 2023, specify how an entity should assess whether a currency is exchangeable and how it should determine a spot exchange rate when exchangeability is lacking. The amendments are effective for annual reporting periods beginning on or after 1 January 2025. These amendments are not expected to give rise to a material impact on the Company's financial statements.

Amendments to IFRS 9, 'Financial Instruments' and IFRS 7, 'Financial Instruments: Disclosures': 'Amendments to the Classification and Measurement of Financial Instruments'

These amendments, issued in May 2024, provide the following:

- Clarification around the date of recognition and derecognition of some financial assets and liabilities, with a new exception for some financial liabilities settled through an electronic cash transfer system;
- Clarification and guidance for assessing whether a financial asset meets the solely payments of principal and interest (SPPI) criterion;
- New disclosure requirements for certain instruments with contractual terms that can change cash flows (such as some financial instruments with features linked to the achievement of environment, social and governance targets); and
- An update to the disclosures for cash flow instruments designated at fair value through other comprehensive income (FVOCI).

The amendments are effective for annual reporting periods beginning on or after 1 January 2026. These amendments are not expected to give rise to a material impact on the Company's financial statements.

## IFRS 18, 'Presentation and Disclosure in Financial Statements'

IFRS 18, issued in April 2024, will replace IAS 1, 'Presentation of Financial Statements'. IFRS 18 introduces new requirements for presentation within the Statement of Comprehensive Income, including specified totals and subtotals, which aim at helping to achieve comparability of the financial performance of similar entities, as well as provide more relevant information and transparency to users.

The standard is effective for reporting periods beginning on or after 1 January 2027, with earlier application permitted. The Company is currently working to identify all impacts the amendments will have on the primary financial statements and notes to the financial statements.

## IFRS 19, 'Subsidiaries without Public Accountability: Disclosures'

IFRS 19, issued in May 2024, allows for certain eligible subsidiaries of parent entities that report under IFRS Accounting Standards to apply reduced disclosure requirements. IFRS 19 is effective for reporting periods beginning on or after 1 January 2027, with early application permitted. The Company does not expect this to have any impact on the financial statements.

#### B Critical accounting policies and the use of estimates

The preparation of the financial statements includes the use of estimates and assumptions which affect items reported in the Statement of Financial Position and Statement of Comprehensive Income and the disclosure of contingent assets and liabilities at the date of the financial statements. Although these estimates are based on management's best knowledge of current circumstances and future events and actions, material adjustments could be made to the carrying amounts of assets and liabilities within the next financial year. The Group and Company Audit Committees review the reasonableness of judgements associated with and the application of material accounting policies.

The major areas of critical accounting judgement on policy application are considered below:

Insurance and investment contract liabilities (Notes 14 and 15): Product classification and the assessment of the significance of insurance risk transferred to the Company in determining whether a contract should be accounted for as an insurance or investment contract.

Contracts which transfer significant insurance risk to the Company are classified as insurance contracts. Contracts that transfer financial risk (e.g. change in interest rate or security price) to the Company but not significant insurance risk are classified as investment contracts.

Judgement is required in order to assess the significance of the transfer of insurance risk within a contract. This assessment is based on whether the occurrence of an insured event could cause the Company to make significant additional payments, i.e. if the occurrence of the event causes significantly higher cash out flows for the Company than its non-occurrence.

Certain contracts, which are both insurance and investment, can contain discretionary features representing the contractual right to receive additional benefits as a supplement to guaranteed benefits under certain conditions, being:

- that the additional benefits are a significant portion of the total contractual benefits;
- the timing and amount of the additional benefits is at the discretion of the Company; and
- · that the additional benefits are contractually dependent upon the performance of an entity, fund or specified pool of assets.

Insurance contracts and investment contracts with such discretionary participation features are accounted for under IFRS 17, while investment contracts without discretionary participation features are accounted for as financial instruments under IFRS 9.

Judgement is therefore required in order to establish whether any additional benefits in an insurance or investment contract meet the above requirements for being considered discretionary participation features. The Company currently has no contracts with discretionary participation features.

# Valuation of unquoted illiquid assets (Note 9)

Determination of fair value of unquoted and illiquid assets involves judgements in model valuations, through the incorporation of both observable and unobservable market inputs, which include assumptions that lead to the existence of a range of plausible valuations for financial assets.

In assessing asset valuation, in line with applicable standards and guidance, the Company has both projected the short-term impact on earnings and cash flows of the current market volatility, while continuing to review the assets' ability to deliver longer term returns aligned to their investment cases.

Note 22 includes a sensitivity analysis on the fair value of unquoted illiquid assets and investment property to reasonable alternative assumptions.

## Valuation of insurance contract liabilities (Note 16)

The key judgements around the valuation of insurance and investment contract liabilities relate to the following assumptions:

- Determination of the longevity, mortality and morbidity assumptions used in the calculation of the insurance contract liabilities; the assumptions for the rate of future longevity, mortality and morbidity are based on the Company's internal experience and judgements about how experience may vary in the future. This assessment takes into account market benchmarking, internal experience studies and independent industry data. The long-term assumptions are adjusted to reflect the Company's view on the effects of the Covid-19 pandemic on claims experience in the medium to long-term, informed by emerging experience and industry studies.
- Determination of the directly attributable expense assumptions used in the calculation of the insurance liabilities. These represent the expected future costs that relate directly to the fulfilment of the underlying insurance policies and are based on management's best estimate of these future costs, and on an appropriate allocation between servicing new and existing business.
- Determination of valuation interest rates used to discount the liabilities, which are sensitive to the assumptions made, for example, on credit default of the backing assets. These assumptions take into account consideration of market experience and historic internal data. The valuation interest rate is also sensitive to the selection of the reference portfolio of assets chosen to back the liabilities.
- Determination of the compensation required for bearing the uncertainty about the amount and timing of the cash flows arising from non-financial risks as insurance contracts are fulfilled, in the calculation of the Risk Adjustment.
- Determination of the weighting of the coverage units, used to calculate the contractual service margin (CSM) amortisation in the year, between the payment phase and the deferral phase for deferred annuities. Judgement is required to combine the different coverage units so that they fairly reflect the services provided.
- Determination of the transition date CSM under IFRS 17 incorporated judgement. In particular, the transition date CSM for business transitioned using the fair value methodology persist into the closing valuation of the CSM until those portfolios expire.

Note 22 includes a sensitivity analysis on post-tax Company profit and Company equity to reasonable alternative assumptions.

#### Consideration of climate change

The Company is exposed to climate change through two broad categories: transition risks from the move to a low-carbon economy and the impact this has on asset valuation and the economy; and physical risks from the impact on asset holdings as a result of severe weather events and longer-term shifts in climate.

At the current time, the Company does not consider climate risk to represent a significant area of judgement or of estimation uncertainty. As at 31 December 2024, no material impacts on the Company's financial position, nor on the valuation of assets or liabilities on the Company's Statement of Financial Position as a result of climate change risk have been identified.

#### Going concern

In preparing the financial statements, the Board of Directors are required to assess the Company's ability to continue as a going concern, by taking into account all available information related to at least 12 months from the date of their approval. Climate-related matters have been considered as part of this assessment and have not been deemed to create material uncertainties as to their conclusions or to require specific disclosure.

# Valuation of Level 3 financial investments

The valuation of unquoted illiquid assets has been separately identified as an area of significant estimation uncertainty. The assumptions used in the models underpinning these assets' valuation, such as cash flows forecasts, discount rates, and multiples, are often unobservable. Due to the need to apply significant judgements, these assumptions can be impacted by transition risk, with climate related inputs gaining more traction (e.g. construction methods and materials, EPC ratings, ESG credentials and climate resilience). This is particularly relevant for the Company's direct investments portfolio, including alternative assets. The Company's Level 3 assets are valued using appropriately qualified external valuers, and therefore reflect current market sentiments around climate risk. In this respect market and investor expectations have also been evolving, with greater demand towards net zero-aligned assets, and away from traditional carbon-intensive methods, impacting expected investor returns and therefore discount rates and multiples. Exposure to the risks of climate change is minimised, through rigorous assessment of potential investments and active monitoring of the carbon intensity of the current portfolio.

# Insurance contract liabilities

The Company's insurance contracts are valued using discount rates derived from the backing asset portfolios with deductions made to remove risks that are present in the assets but are not relevant to the insurance liability. Climate-related risks could impact on the Company's exposure to future credit losses which would impact on the appropriate yield deductions in the discount rate calculation and therefore the insurance contract valuations.

#### Provisions and contingent liabilities

The recognition, measurement and disclosure of provisions and contingent liabilities is subject to setting assumptions around future events and the probability of their occurrence. Climate related matters could affect these elements, for example by requiring recognition or disclosure of a legal obligation (e.g. levies imposed for failing climate related targets) or of a constructive obligation (e.g. requirements to remediate environmental damage caused by the Company's operations and investment portfolios).

#### Deferred tax assets

Deferred tax assets are recognised for deductible temporary differences and unused tax losses and credits, to the extent it is probable that future taxable profit will be available, against which those amounts can be utilised. Climate related matters could affect the Company's estimate of future taxable profits, and therefore it may be required to derecognise deferred tax assets previously held on the Statement of Financial Position.

## Material accounting policies

The Company has selected accounting policies which state fairly its financial position, financial performance and cash flows for a reporting period. The accounting policies have been consistently applied to all years presented unless otherwise stated.

Financial assets and financial liabilities are disclosed gross in the Statement of Financial Position unless a legally enforceable right of offset exists and there is an intention to settle recognised amounts on a net basis. Income and expenses are not offset in the Statement of Comprehensive Income unless required or permitted by any accounting standard or International Financial Reporting Interpretations Committee (IFRIC) interpretation, as detailed in the applicable accounting policies of the Company.

The principal accounting policies adopted in preparing these financial statements are set out below.

#### C Insurance contracts

#### Long term insurance contracts - initial measurement

Insurance contracts are contracts which transfer significant insurance risk to the insurer at the inception of the contract. This is the case if, and only if, an insured event could cause an insurer to make significant additional payments in any scenario, other than a scenario which lacks commercial substance. Such contracts remain insurance contracts until all rights and obligations are extinguished or expire.

At inception, the Company separates the following components from an insurance or reinsurance contract and accounts for them as if they were stand-alone financial instruments:

- derivatives embedded in the contract whose economic characteristics and risks are not closely related to those of the host contract, and whose terms would not meet the definition of an insurance or reinsurance contract as a stand-alone instrument; and
- distinct investment components, i.e. investment components that are not highly inter-related with the insurance components and for which contracts with equivalent terms are sold, or could be sold, separately in the same market or the same jurisdiction.

After separating any financial instrument components, the Company separates any promises to transfer to policyholders' distinct goods or services other than insurance coverage and investment services and accounts for them as separate contracts with customers (i.e. not as insurance contracts). A good or service is distinct if the policyholder can benefit from it either on its own or with other resources that are readily available to the policyholder. A good or service is not distinct and is accounted for together with the insurance component if the cash flows and risks associated with the good or service are highly inter-related with the cash flows and risks associated with the insurance component, and the Company provides a significant service of integrating the good or service with the insurance component.

#### Recognition and level of aggregation

An insurance contract is recognised at the earliest of the following:

- (a) the beginning of the coverage period;
- (b) the date when the first payment from a policyholder becomes due; and
- (c) for onerous contracts, when the contract becomes onerous.

The level of aggregation determines the unit of account at which IFRS 17 calculations are performed. This is determined firstly by dividing the business written into portfolios. Portfolios comprise Groups of contracts with similar risks which are managed together. Portfolios are further divided based on expected profitability at inception into three categories: onerous contracts, contracts with no significant risk of subsequently becoming onerous, and the remainder. IFRS 17 also requires that no Group for level of aggregation purposes may contain contracts issued more than one year apart. The insurance contract disclosures have been aggregated at the level of the major product lines of the business, annuities and protection. This disaggregation reflects their similar main characteristics and avoids the presentation of insignificant detail.

All of the Company's in scope insurance contracts are accounted for under the general measurement model which measures a group of insurance contracts as the total of:

- fulfilment cash flows: and
- a CSM representing the unearned profit the group will recognise as it provides services under the insurance contract.

#### Fulfilment cash flows

Fulfilment cash flows comprise unbiased and probability-weighted estimates of future cash flows, discounted to present value to reflect the time value of money and financial risks, plus a Risk Adjustment for non-financial risk. The Company's objective in estimating future cash flows is to determine the expected value, or the probability weighted mean, of the full range of possible outcomes, considering all reasonable and supportable information available at the reporting date without undue cost or effort. The Company estimates future cash flows considering a range of scenarios which have commercial substance and give a good representation of possible outcomes. The cash flows from each scenario are probability-weighted and discounted using current assumptions.

When estimating future cash flows, the Company includes all cash flows that are within the contract boundary. The cash flows include:

- premiums and related cash flows;
- claims and benefits, including reported claims not yet paid, incurred claims not yet reported and expected future claims;
- investment management costs incurred in the provision of an investment return service or to enhance the benefits of an insurance contract;
- payments to policyholders resulting from embedded surrender value options;
- an allocation of insurance acquisition cash flows attributable to the portfolio to which the contract belongs;
- claims handling costs;
- policy administration and maintenance costs;
- an allocation of fixed and variable overheads directly attributable to fulfilling insurance contracts; and
- transaction-based taxes.

The Company incorporates, in an unbiased way, all reasonable and supportable information available without undue cost or effort about the amount, timing and uncertainty of those future cash flows. The Company estimates the probabilities and amounts of future payments under existing contracts based on information obtained, including:

- information about claims already reported by policyholders;
- other information about the known or estimated characteristics of the insurance contracts;
- historical data about the Company's own experience, supplemented when necessary, with data from other sources. Historical data is adjusted to reflect current conditions; and
- current pricing information, when available.

The measurement of fulfilment cash flows includes insurance acquisition cash flows which are allocated as a portion of premium to profit or loss (through insurance revenue) over the period of the contract.

Pre-recognition, insurance acquisition cash flow assets are recognized on the Statement of Financial Position prior to allocation to new insurance contracts and are considered for impairment at each reporting date.

#### Risk Adjustment

The Risk Adjustment for non-financial risk for a group of insurance contracts reflects the compensation that the Company would require for bearing uncertainty about the amount and timing of the cash flows that arises from non-financial risk after diversification. The Company's Risk Adjustment is calibrated using a Value at Risk (VAR) methodology.

#### Discounting

The insurance contract fulfilment cash flows are discounted at rates that reflect the characteristics of the insurance contract liabilities. These are determined by starting from an appropriate asset portfolio with deductions to remove risks in the assets that are not present in the insurance liabilities.

#### Contractual service margin (CSM)

The Company's CSM is a component of the asset or liability for the group of insurance contracts that represents the unearned profit the Company will recognise as it provides services in the future. The Company measures the CSM on initial recognition at an amount that, unless the group of contracts is onerous, results in no income or expenses arising from:

- initial recognition of the fulfilment cash flows;
- any cash flows arising from the contracts in the group at that date; and
- the derecognition at the date of initial recognition of :
  - any asset for insurance acquisition cash flows; and
  - any other asset or liability previously recognised related to the group of insurance contracts.

#### Onerous contracts

For groups of contracts assessed as onerous, the Company recognises a loss in profit or loss for the net outflow, resulting in the carrying amount of the liability for the group being equal to the fulfilment cash flows and the CSM of the group being zero. A loss component is established by the Company for the liability for remaining coverage for an onerous group, which represents the losses recognised.

#### Long term insurance contracts - subsequent measurement

The Company measures the carrying amount of a group of insurance contracts at the end of each reporting period as the sum of:

- the liability for remaining coverage comprising fulfilment cash flows related to future service allocated to the group at that date and the CSM of the group at that date; and
- (ii) the liability for incurred claims for the group reflecting the fulfilment cash flows related to past service allocated to the group at that date.

# Contractual service margin - measurement

The CSM at the end of the reporting period represents the profit in the group of insurance contracts that has not yet been recognised in profit or loss, because it relates to future service to be provided.

For a group of insurance contracts, the carrying amount of the CSM of that group at the end of the reporting period equals the carrying amount at the beginning of the reporting period adjusted for:

- the effect of any new contracts added;
- interest accreted on the carrying amount of the CSM during the reporting period, measured at the discount rates at initial recognition;
- the changes in fulfilment cash flows relating to future service, except to the extent that:
  - such increases in the fulfilment cash flows exceed the current carrying amount of the CSM, giving rise to a loss; or
  - such decreases in the fulfilment cash flows are allocated to the loss component of the liability for remaining coverage.
- the amount recognised as insurance revenue because of the transfer of services in the period, determined by allocation of the CSM at the end of the period over the current and remaining coverage period; and
- the effect of any currency exchange differences on the CSM.

The changes in fulfilment cash flows relating to future service that adjust the CSM comprise of:

- experience adjustments that arise from the difference between the premium receipts (net of refunds) and any related cash flows such as insurance acquisition cash flows and insurance premium taxes and the estimate, at the beginning of the period, of the amounts expected;
- differences related to premiums received (or due) in respect of current or past services are recognised immediately in profit or loss while differences related to premiums received (or due) for future services are adjusted in the CSM;
- changes in estimates of the present value of future cash flows in the liability for remaining coverage, except those relating to the time value of money and changes in financial risk (which are instead recognised in the Statement of Comprehensive Income);
- differences between any investment component expected to become payable in the period and the actual investment component that becomes payable in the period; and
- changes in the Risk Adjustment for non-financial risk that relate to future service.

Adjustments to the CSM noted above are measured at discount rates that reflect the characteristics of the cash flows of the group of insurance contracts at initial recognition (i.e. the weighted average of the rates applicable at the date of initial recognition of contracts that joined a group over a 12-month period).

#### Onerous contracts

Groups of contracts that were not onerous at initial recognition can subsequently become onerous if assumptions and experience changes. The Company establishes a loss component for any onerous group depicting the future losses recognised. The loss component is released based on a systematic allocation of the subsequent changes in the fulfilment cash flows to: (i) the loss component; and (ii) the liability for remaining coverage excluding the loss component. The loss component is also updated for subsequent changes in estimates of the fulfilment cash flows related to future service. The systematic allocation of subsequent changes to the loss component results in the total amounts allocated to the loss component being equal to zero by the end of the coverage period of a group of contracts (since the loss component will have materialised in the form of incurred claims). The loss component ensures that over the duration of the contract, the correct amounts are recognised as insurance revenue and insurance service expenses.

#### Contractual service margin - recognition

The amount of CSM recognised in the Statement of Comprehensive Income for a group of insurance contracts reflects the insurance contract services provided. The proportion of the CSM earned is calculated as the amount of coverage units provided in the period divided by the sum of all the future and current period coverage units. The Company has elected to discount the future coverage units in this calculation. The table below indicates the main insurance contracts services provided under the Company's insurance contracts and selected "coverage unit(s)" used to measure those services.

Insurance Contract	Insurance Service	Coverage unit(s)
Immediate annuity	Payment of insurance claims	Expected annual claims payments
	Payment of insurance claims (payment phase)	Expected annual claims payments
Deferred annuity	Investment return service (deferral phase)	Expected investment return on backing assets
	Lump sum death benefits (deferral phase)	Sum assured
Longevity swaps	Payment of floating leg of swap	Expected annual floating leg payments
Retail Protection	Potential mortality or morbidity claims	Sum assured

Where a specific unit of account contains a mixture of services, and therefore coverage units, it is necessary to weight the coverage units so that the resulting profile of CSM release reflects the overall package of benefits provided. This is particularly pertinent to units of account incorporating a combination of immediate and deferred annuities. Under IFRS 17, deferred annuities usually provide multiple services, split between the two phases of benefit provision (the deferral phase and the payment phase). Significant judgement is therefore required to combine the different coverage units so that they fairly reflect the services provided. The weighting between the deferral phase and the payment phase coverage units is calculated so that the services provided in the deferral phase reflect the investment return provided and the probability weighted delivery of any lump sum death benefits, both adjusted to target that all of the CSM is earned in the deferral phase for all contracts which do not enter the payment phase either through transfer out, withdrawal of funds or death.

### Investment components

The Company identifies the investment component of a contract by determining the amount that it would be required to repay to the policyholder in all scenarios with commercial substance. Investment components are not included in insurance revenue and insurance service expenses.

#### Insurance finance income and expense

Insurance finance income and expenses comprise changes in the carrying amounts of groups of insurance contracts arising from the effects of the time value of money, financial risk, and changes therein. IFRS 17 requires an accounting policy decision as to whether to recognise all finance income or expense in profit or loss, or whether to disaggregate the income or expense that relates to changes in financial assumptions into other comprehensive income. Finance income and expense has been included in profit or loss for all insurance products except for the Company's protection business where it has been disaggregated between profit and loss and other comprehensive income. Where insurance finance income and expense has been disaggregated, the amount included in profit or loss is determined by a systematic allocation of the expected total insurance finance income or expenses over the duration of the group of contracts, using the discount rates determined on initial recognition.

Changes in the Risk Adjustment for non-financial risk have been disaggregated between insurance service result and insurance finance income and expenses.

#### Derecognition and contract modification of insurance contracts

The Company derecognises a contract when it is extinguished, i.e. when the specified obligations in the contract expire or are discharged or cancelled.

The Company also derecognises a contract if its terms are modified in a way that would have changed the accounting for the contract significantly had the new terms always existed, in which case a new contract based on the modified terms is recognised. If a contract modification does not result in derecognition, then the Company treats the changes in cash flows caused by the modification as changes in estimates of fulfilment cash flows.

## Measurement on transition to IFRS 17

On transition to IFRS 17, the insurance contract liabilities were restated, retrospectively applying the Company's accounting policies. In line with the provisions available in IFRS 17, the Company applied the full retrospective approach unless impracticable. The full retrospective approach required the Company to:

- identify, recognise and measure each group of insurance and reinsurance contracts as if IFRS 17 had always applied;
- · derecognise any existing balances that would not exist had IFRS 17 always applied; and
- · recognise any resulting net difference in equity.

If it was impracticable to apply a full retrospective approach to a group of contracts then the Company selected an approach either between the modified retrospective approach and the fair value approach. If the Company could not obtain reasonable and supportable information necessary to apply the modified retrospective approach, then the fair value approach was selected.

#### Modified retrospective approach

The objective of the modified retrospective approach is to achieve the closest outcome to retrospective application possible using reasonable and supportable information available without undue cost or effort. For insurance and reinsurance contracts where the modified retrospective approach has been adopted, the best estimate and Risk Adjustment components of fulfilment cash flows were recognised and measured using the Company's accounting policies at the date of transition except for the application of a permitted transition modification that, for some groups of contracts issued before 1 January 2021, the Risk Adjustment for non financial risk on initial recognition was determined by adjusting the amount at 1 January 2022 for the expected release of risk before that date. The expected release was determined with reference to the release of risk of similar contracts that the Company issued in 2022. This modification was used to avoid the application of hindsight to the calibration of the Risk Adjustment in prior periods.

#### Fair value approach

For insurance and reinsurance contracts where the fair value approach has been adopted, the best estimate and Risk Adjustment components of fulfilment cash flows were determined as at 1 January 2022. The Company determined the CSM of the liability for remaining coverage at the transition date, as the difference between the fair value of the group of insurance contracts and the fulfilment cash flows measured at that date. In determining fair value, the Company applied the requirements of IFRS 13, 'Fair Value Measurement', except for the demand deposit floor requirement.

#### D Financial instruments

#### Recognition and derecognition

Initial recognition of financial assets and liabilities is on the trade date, which is the date on which the Company becomes a party to the contractual provisions of the instrument. A financial asset or financial liability is initially measured at fair value plus, for a financial asset or financial liability not measured at fair value through profit or loss, transaction costs that are directly attributable to its acquisition or issue. When the fair value of financial assets and liabilities differs from the transaction price on initial recognition, the Company recognises the difference as follows:

- when the fair value is evidenced by a quoted price in an active market for an identical asset or liability (i.e. a Level 1 input) or based on a valuation technique that uses only data from observable markets, the difference is recognised as a gain or loss; and
- in all other cases, the difference is deferred and the timing of recognition of deferred day one profit or loss is determined individually. It is either amortised over the life of the instrument, deferred until the instrument's fair value can be determined using market observable inputs or realised through settlement.

Financial assets are derecognised only when the contractual rights to the cash flows from the asset expire, or when the Company transfers substantially all the risks and rewards of ownership to another entity.

The Company enters into transactions whereby it transfers assets recognised in its Statement of Financial Position but retains either all or substantially all of the risks and rewards of the transferred assets. In these cases, the transferred assets are not derecognised. Examples of such transactions are repurchase agreements and non-cash collateral pledged, unless the Company defaults on its obligations under the relevant agreement.

In transactions in which the Company neither retains nor transfers substantially all of the risks and rewards of ownership of a financial asset and it retains control over the asset, the Company continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset.

The Company derecognises a financial liability when its contractual obligations expire or are discharged or cancelled. The Company also derecognises a financial liability when its terms are modified and the cash flows of the modified liability are substantially different, in which case a new financial liability based on the modified terms is recognised at fair value.

On derecognition of a financial asset or financial liability, the difference between the carrying amount at the date of derecognition and the consideration received (including any new asset obtained less any new liability assumed) is recognised in profit or loss.

#### Modification

If the terms of a financial asset are modified, then the Company evaluates whether the cash flows of the modified asset are substantially different. If the cash flows are substantially different, then the contractual rights to cash flows from the original financial asset are deemed to have expired. In this case, the original financial asset is derecognised and a new financial asset is recognised at fair value plus any eligible transaction costs.

# Classification and measurement of financial assets

The Company classifies its financial assets on initial recognition as measured at amortised cost, fair value through other comprehensive income (FVOCI) and fair value through profit or loss (FVTPL).

The classification and measurement of financial assets depends on their contractual cash flow characteristics and how they are managed (the entity's business model). The contractual cash flow characteristics test aims to identify those assets with cash flows consistent with a basic lending arrangement, i.e. which are 'solely payments of principal and interest' (SPPI). The business model test refers to how an entity manages its financial assets with the objectives of generating cash flows. These factors determine whether the financial assets are measured at amortised cost, FVOCI or FVTPL. Assets are therefore typically characterised as follows:

- amortised cost: financial assets with contractual terms that give rise solely to interest and principal cash flows, and which are held in a
  business model whose objective is to hold the assets to collect their cash flows. They are measured at amortised cost using the effective
  interest method. Interest income, foreign exchange gains and losses and impairment are recognised in profit or loss. Any gain or loss on
  derecognition is also recognised in profit or loss;
- FVOCI: financial assets with contractual terms that give rise solely to interest and principal cash flows, and which are held in a business
  model whose objective is achieved by holding the assets to collect their cash flows and selling them. Interest income calculated using the
  effective interest method, foreign exchange gains and losses and impairment are recognised in profit or loss. Other net gains and losses
  are recognised in other comprehensive income. On derecognition, gains and losses accumulated in OCI are reclassified to profit or loss;
  and
- FVTPL: all other financial assets. Net gains and losses, including any interest or dividend income and foreign exchange gains and losses, are recognised in profit or loss.

Notwithstanding the above, on initial recognition the Company may irrevocably designate to FVTPL a financial asset that would otherwise be measured at amortised cost or FVOCI if doing so eliminates or greatly reduces an accounting mismatch.

In making the SPPI assessment, the Company considers whether the contractual cash flows are consistent with a basic lending arrangement (that is, interest includes only consideration for the time value of money, credit risk, other basic lending risks and a profit margin that is consistent with a basic lending arrangement). This includes evaluating whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition. Examples of such contractual terms to be considered are contingent events that would change the amount or timing of cash flows, leverage features, prepayment and extension features, non-recourse asset arrangements and features that modify consideration for the time value of money (e.g. periodic reset of interest rates).

The business model reflects how the Company manages assets in order to generate cash flows, i.e. it reflects whether the Company's objective is solely to collect the contractual cash flows from assets or to collect both the contractual cash flows and cash flows arising from the sale of assets. If neither of these is applicable (for example, financial assets are held for trading purposes), the business model is 'other' and the financial asset is measured at FVTPL. Factors considered by the Company in determining the business model for a group of assets include past experience on how the cash flows for these assets were collected, how the asset's performance is evaluated and reported to key management personnel, how risks are assessed and managed, and how managers are compensated.

The objective of the Company's business model for certain debt instruments, in particular those instruments backing annuity or investment contract liabilities, including surplus assets, is to fund its liabilities. Consistent with the Company's investment strategy their performance is evaluated on a total return basis, as significant buying and selling activity is undertaken on a regular basis to rebalance its portfolio and to ensure that contractual cash flows from those assets are sufficient to settle the underlying liabilities. These investments do not follow a 'held to collect' or 'held to collect and sell' business model and are therefore accounted for at FVTPL. This business model is also applicable to reverse repurchase agreements and to derivatives. Equity instruments are accounted for at FVTPL.

Receivables are accounted for at amortised cost.

#### Classification and measurement of financial liabilities

The Company classifies and subsequently measures financial liabilities at amortised cost or FVTPL.

#### Other financial liabilities

Other financial liabilities include derivative liabilities, are measured at FVTPL, while other payable balances are measured at amortised cost.

#### **Derivatives**

Derivatives are initially recognised at fair value on the date on which the derivative contract is entered into. The Company's derivatives are instruments held for trading and are therefore accounted for at FVTPL.

Derivatives may be embedded in another contractual arrangement. If such a hybrid contract contains a host that is a financial asset, the Company assesses the entire contract for classification and measurement purposes. Otherwise, the Company accounts for an embedded derivative separately from the host contract when:

- its economic characteristics and risks are not closely related to those of the host contract;
- the terms of the embedded derivative would have met the definition of a derivative if they were contained in a separate contract; and
- the hybrid contract is not measured at FVTPL.

These embedded derivatives are separately accounted for at FVTPL, unless the Company chooses to designate the entire hybrid contract at FVTPL.

A derivative embedded in a host insurance contract is not accounted for separately from the host contract if the embedded derivative itself meets the definition of an insurance contract.

# Impairment of financial assets

The Company assesses on a forward-looking basis the expected credit loss (ECL) associated with its financial assets measured at amortised cost and FVOCI and recognises a loss allowance for such losses at each reporting date. Expected credit losses are defined as the present value of the difference between all contractual cash flows that are due and all cash flows that the entity expects to receive (i.e. the cash shortfall), weighted based on their probability of occurrence. The loss allowance recognised under IFRS 9 can be equal to an amount corresponding to a 12-month ECL or a lifetime ECL. A lifetime ECL is the ECL resulting from all possible default events over the expected life of the financial asset; a 12-month ECL is the portion of lifetime ECL resulting from default events on a financial asset that are possible within the 12 months after the reporting date. For a financial asset that is credit-impaired at the reporting date, but that is not a purchased or originated credit-impaired financial asset, expected credit losses are measured as the difference between the asset's gross carrying amount and the present value of estimated future cash flows, discounted at the financial asset's original effective interest rate. Any adjustment is recognised in profit or loss as an impairment gain or loss.

The Company defines default on a financial asset as the inability to meet in full and on time an original promise of expected cash flows, the amount and timing of which are defined with certainty. Any breach of this promise, by any amount or time (in excess of any potential planned grace period), constitutes a default. This is consistent with the definition of default used for internal credit risk management purposes. An asset is credit-impaired when one or more events that have a detrimental impact on the estimated future cash flows of that financial asset have occurred. Evidence that a financial asset is credit-impaired includes the following observable data:

- significant financial difficulty of the borrower;
- a breach of contract, such as a default or past due event;
- the restructure of a loan by the Group on terms which it would not otherwise consider;
- it becomes probable that the borrower will enter bankruptcy or other financial reorganisation.

A financial asset is written off when there is no reasonable expectation of recovering the contractual cash flows.

The ECL model is run from the date of initial recognition of a financial asset, and its output updated at every reporting period, even if no actual loss events have taken place. The impact of updating the inputs of the ECL model in the reporting period is recognised in profit or loss directly where it affects the carrying value of financial assets at amortised cost, while for assets at FVOCI an equal and opposite movement is recorded in other comprehensive income.

In order to determine whether the Company measures ECLs at an amount equal to 12-month ECL or lifetime ECL, at each reporting period the Company is required to assess which 'stage' a financial asset falls into. Stages reflect the general pattern of deterioration in credit risk of a financial instrument that ultimately defaults, as follows:

- Stage 1 includes financially healthy financial assets that are expected to perform in line with their contractual terms, and which have no signs of increased credit risk;
- Stage 2 includes financial assets for which a significant increase in credit risk has occurred since initial recognition, but which are not credit-impaired; and
- Stage 3 applies to credit-impaired financial instruments.

When financial assets are under Stage 1, 12-month ECLs are recognised. When financial assets are under Stage 2 or 3, lifetime ECLs are recognised. An instrument moves down (or up) the stages when a Significant Increase in Credit Risk (SICR) has happened (or has reversed).

When determining whether the credit risk of a financial instrument has increased significantly since initial recognition, the Company considers reasonable and supportable information, both qualitative and quantitative, that is relevant and is available without undue cost or effort, including forward-looking information at its disposal. Key indicators used in order to determine whether a SICR has occurred (either in isolation or in combination) are:

- deterioration in rating grade between origination date and reporting date. The level of deterioration required by an individual asset is determined using a relative rating matrix;
- · exposure is identified on the investment managers' 'watchlist';
- exposure is identified on internal 'credit watchlists'; and
- a manual shift of an exposure to Stage 2 or Stage 3 on an exceptional basis (where required, using management judgement).

The provisions of IFRS 9 include a rebuttable presumption that the credit risk on a financial asset has increased significantly since initial recognition when contractual payments are more than 30 days past due, which is taken into account for this assessment.

The Company makes use of a practical expedient available in IFRS 9 whereby it can be assumed that the credit risk on a financial instrument has not increased significantly since initial recognition if the financial instrument is determined to have low credit risk at the reporting date (e.g. investment grade as determined by the Company's asset managers). This allows recognition of 12-month ECLs as opposed to, potentially, lifetime ECLs. This is deemed to be the case where assets that have been downgraded remain of good credit quality (i.e. investment grade as determined by the Company's asset managers) as at the reporting date, to the extent that the Company's internal credit risk ratings are considered to be consistent with a globally understood definition of 'low credit risk'.

The Company estimates ECLs on its financial investments at amortised cost by using the probability of default approach. Based on this method, the ECLs are a probability-weighted estimate of the present value of estimated cash shortfalls, i.e. the weighted average of credit losses, with the respective risks of a default occurring used as the weightings. For this purpose, the key elements to be calculated are the Probability of Default (PD), i.e. the estimate of the likelihood of default over a given time horizon (either 12 months or lifetime); the respective Loss Given Default (LGD); and the Exposure at Default (EAD).

The Company has adopted a simplified approach for trade receivables, contract assets and finance and operating lease receivables. This allows measurement of lifetime ECLs only, thereby removing the need to identify SICRs. For these balances, the Company makes use of provision matrices in order to calculate such lifetime ECLs. This is a practical expedient allowed by IFRS 9 whereby historical credit loss experience and fixed loss rates are applied to the balances outstanding. Historical loss rates are adjusted to allow for forward looking information.

#### Fair value measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

Fair value measurements are based on observable and unobservable inputs. Observable inputs reflect market data obtained from independent sources, while unobservable inputs reflect the Company's view of market assumptions in the absence of observable market information. The Company utilises techniques that maximise the use of observable inputs and minimise the use of unobservable inputs.

The best evidence of the fair value of a financial instrument at initial recognition is normally the transaction price. In certain circumstances, the fair value at initial recognition differs from the transaction price. If the fair value is evidenced to comparison to a quoted price in an active market for an identical instrument or is based on a valuation technique that uses only data from observable markets, the difference between the fair value at initial recognition and the transaction price is recognised as a gain or loss in the Statement of Comprehensive Income. In all other cases, the difference between the fair value at initial recognition and the transaction price is deferred and recognised in the Statement of Comprehensive Income over the life of the instrument to the extent that it arises from a change in a factor (including time) that market participants would take into account when pricing the instrument.

#### E Insurance revenue

The Company's insurance revenue depicts the provision of services arising from a group of insurance contracts, reflecting the consideration to which the Company expects to be entitled in exchange for those services. Insurance revenue from a group of insurance contracts is therefore the relevant portion for the period of the total consideration for the contracts, (i.e. the amount of premiums paid to the Company adjusted for financing effect (the time value of money) and excluding any investment components).

The total consideration for a group of contracts covers amounts related to the provision of services and is comprised of:

- the release of the CSM:
- changes in the Risk Adjustment for non-financial risk relating to current service;
- · claims and other insurance service expenses expected at the beginning of the period;
- experience adjustments arising from premiums received in the period other than those that relate to future service;
- insurance acquisition cost recovery determined by allocating the portion of premiums related to the recovery of those costs on the basis of insurance coverage provided; and
- other amounts, including any other pre-recognition cash flow assets derecognised at the date of initial recognition.

### F Investment return

Investment return includes unrealised fair value gains and losses on financial investments at fair value through profit or loss, realised gains and losses, dividends, rent and interest. Dividends are accrued on an ex-dividend basis. Interest income is recognised as it accrues, taking into account the effective yield on the investment. Interest income for financial assets which are not classified as fair value through profit or loss (FVTPL) is recognised using the effective interest method.

A gain or loss on a financial investment is only realised on disposal or transfer, and is the difference between the proceeds received, net of transactions cost and its original cost or amortised cost, as appropriate. Realised gains or losses on investment property represent the difference between the net disposal proceeds and the carrying value of the property.

Unrealised gains and losses represent the difference between the carrying value at the end of the year and the carrying value at the previous year end or purchase value during the year, less the reversal of previously unrealised gains and losses in respect of disposals made during the year.

#### G Insurance service expenses

Insurance service expenses arising from insurance contracts are recognised in profit or loss as they are incurred. They exclude repayments of investment components and comprise the following items:

- incurred claims and benefits, excluding investment components reduced by loss component allocations;
- · incurred directly attributable expenses;
- · insurance acquisition cost amortisation; and
- · insurance acquisition cost asset impairment.

#### **H Dividends**

Final dividends on ordinary shares are recognised as a liability in the period in which they have been approved by shareholders of the company.

### I Cash and cash equivalents

Cash and cash equivalents include cash in hand, deposits held at call with banks, treasury bills and other short-term highly liquid investments with maturities of three months or less from the date of acquisition.

#### J Provisions

Provisions are recognised when the Company has a present legal or constructive obligation as a result of past events, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation, and a reliable estimate of the amount of the obligation can be made. Where the Company expects a provision to be reimbursed, for example under an insurance contract, the reimbursement is recognised as a separate asset but only when the reimbursement is virtually certain. The Company recognises a provision for onerous contracts when the expected benefits to be derived from a contract are less than the unavoidable costs of meeting the obligations under the contract.

## K Tax

#### Current tax

Current tax comprises tax payable on current year profits, adjusted for non-tax deductible or non-taxable items, and any adjustments to tax payable in respect of previous periods. Current tax is recognised in the Statement of Comprehensive Income unless it relates to items which are recognised directly in equity.

#### Deferred tax

Deferred tax is calculated on differences between the accounting value of assets and liabilities and their respective tax values. Deferred tax is also recognised in respect of unused tax losses to the extent it is probable that future taxable profits will arise against which the losses can be utilised. Deferred tax is charged or credited to the Statement of Comprehensive Income, except when it relates to items charged or credited directly in equity.

#### Use of estimates

Tax balances include the use of estimates and assumptions which affect items reported in the Statement of Financial Position and Statement of Comprehensive Income. Although these estimates are based on management's best knowledge of current circumstances and future events and actions, actual results may differ from those estimates.

For tax this includes the determination of assets and liabilities recognised in respect of uncertain tax positions and the estimation of future taxable income supporting deferred tax asset recognition.

#### L Foreign exchange and exchange rates

Foreign currency transactions are translated into the functional currency using the exchange rate prevailing at the date of the transactions. Foreign exchange gains and losses are recognised in the Statement of Comprehensive Income.

# 2. Company information

The Company is a long-term Class E reinsurer under Bermuda's Insurance Act of 1978. The principal activity of the Company is the provision of life reinsurance solutions internally within the Group. The Company has long-term PRT business from the UK (for an affiliated company) and in Ireland and the Netherlands. The Company provides protection reinsurance to affiliates in the United States of America ('USA').

The Company was capitalised in 2014 with £220m. Legal & General Re Holdings Limited ('Re Holdings') is the direct parent and Legal & General Group Plc is the ultimate parent. In 2019, the Company issued an additional £300m of share capital.

The Company is incorporated and domiciled in Bermuda and its registered office and principal place of business is 19 Par-la-Ville Road, Hamilton, HM 11, Bermuda.

Items included in the financial statements are measured using the currency of the primary economic environment in which the entity operates (the 'functional currency'). The financial statements are presented in Pounds ('£'), which is the Company's functional currency.

## 3. Investment return

Total investment return for the year was:

			Other	
For the year ended 31 December 2024	Annuities £m	Protection £m	Assets £m	Total £m
Financial investment return				
Dividend income	8	-	32	40
Interest income/(loss) on financial investments at fair value through profit or loss	(1)	-	3	2
Interest income on financial investments at amortised cost	-	-	8	8
(Losses)/gains on financial investments mandatorily measured at fair value through profit or loss	(5)	-	15	10
(Losses)/gains on derivative instruments mandatorily measured at fair value through profit or loss	(2)	-	3	1
Total investment return	-	-	61	61
Finance expenses from insurance contracts issued <sup>1</sup>	(30)	(2)	-	(32)
Of which are recognised in:				
Profit or loss	(30)	(2)	-	(32)
Other comprehensive income	-	-	-	-

<sup>&</sup>lt;sup>1</sup> includes an expense of £343m from funds withheld.

For the year ended 31 December 2023	Annuities £m	Protection £m	Other Assets £m	Total £m
Financial investment return				
Dividend income	8	-	32	40
Interest income on financial investments at fair value through profit or loss	9	-	4	13
(Losses)/gains on financial investments mandatorily measured at fair value through profit or loss	(3)	-	3	-
Gains on derivative instruments mandatorily measured at fair value through profit or loss	5	-	3	8
Total investment return	19	-	42	61
Finance expenses from insurance contracts issued <sup>1</sup>	(34)	(75)	-	(109)
Of which are recognised in:				
Profit or loss	(34)	(77)	-	(111)
Other comprehensive income	-	2	-	2

<sup>&</sup>lt;sup>1</sup> includes income of £1,257m from funds withheld.

# 4. Other operational expenses

	2024	2023
	£m	£m
Foreign exchange losses (not related to insurance contracts) Other	(5) (2)	(1) (1)
Total other operational expenses	(7)	(2)

# 5. Insurance service and other expenses

	2024 £m	2023 £m
Claims and benefits Fees and commissions	700 43	586 41
Other administrative expenses	10	7
Total other expenses	753	634
Amounts attributed to insurance acquisition cash flows incurred during the year Represented by:	(1)	(2)
Insurance service expenses Other expenses	(742) (11)	(625) (9)

# 6. Foreign exchange and exchange rates

There is no impact on profit for the year from foreign exchange arising on conversion of foreign currency monetary assets and liabilities to functional currency (2023: gain of £5m).

Principal rates of exchange used for translation are:

	2024 Average	2024 Year-End	2023 Average	2023 Year-End
United States Dollar	1.278	1.252	1.244	1.273
Canadian Dollar	1.751	1.800	1.678	1.687
Euro	1.181	1.209	1.150	1.154

## 7. Income Tax

	2024 £m	2023 £m
Current tax	(2)	(2)
Deferred tax - Origination and reversal of temporary differences	-	336
Total impact of deferred tax on the Income Statement	-	336
Tax (expense)/income	(2)	334
	Total 2024 £m	Total Restated 2023 £m
Profit before income tax Tax expense calculated at 25% (2023: 23.5%)	244 (61)	222 (52)
Adjusting for the effects of:  Recurring reconciling items:  Different rate of tax on profits and losses taxed overseas  Non-recurring reconciling items:	59	50
Impact of law changes on deferred tax balances	-	336
Tax income/(expense)	(2)	334
Effective tax rate <sup>1</sup>	0.8%	-150.2%

<sup>&</sup>lt;sup>1</sup> The effective tax rate is calculated by dividing the tax (expense)/income over profit before income tax.

Legal & General Reinsurance Company Limited is tax resident in the UK and therefore subject to UK income tax at 25% (2023: 23.5%). Tax affected profits of the Bermuda branch are then adjusted as a reconciling item for the effective tax rate of 0% in Bermuda.

The deferred tax asset of £336m (2023: £336m) is included within the deferred tax disclosure in Note 11 and is within the line item for the difference between tax and accounting value of insurance contracts.

The Bermuda Corporation Income Tax came into force on 1st January 2025 and the interaction with the UK rules will be kept under review as guidance emergences for any future impact. Further guidance on the implementation of these new rules is expected in due course.

# 8. Dividend

	Per share 2024 Pence	Total 2024 £m	Per share 2023 Pence	Total 2023 £m
Ordinary share dividends paid in the year - Final dividend	59.23	230	46.10	179
Total dividends paid in year	59.23	230	46.10	179

During the 2024 financial year the Company paid a dividend of £230m (2023: £179m) to its parent company Re Holdings. The total dividend per share was 59.23p (2023: 46.10p).

#### 9. Financial investments

#### (i) Financial investments at fair value

	Notes	Total 2024 £m	Total 2023 £m
Financial investments at fair value classified as: Fair value through profit or loss <sup>1</sup> Fair value through profit or loss - derivatives <sup>1</sup>		1,064 73	1,030 81
Financial investments at fair value Debt securities at amortised cost Loans at amortised cost		1,137 301 56	1,111 301 -
Total financial investments	9 (ii)	1,494	1,412
Expected to be received within 12 months Expected to be received after 12 months		10 1,484	11 1,401

<sup>&</sup>lt;sup>1</sup> Mandatorily measured at fair value through profit and loss.

The risks associated with financial investments are outlined in Note 22. Financial investments have been allocated between those expected to be settled within 12 months and after 12 months in line with the expected settlement of the backed liabilities.

Financial investments within the Euro Long-term Fund include £71m (2023: £82m) of debt securities pledged as collateral in the course of writing treaties with the Company's counterparties. The assets used as collateral are AAA, AA, A and BBB Corporate and Government bonds (2023: AAA, AA, A, BBB Corporate and Government bonds) having a residual maturity of up to 32 years (2023: 33 years). The Company is entitled to receive all of the cash flows from the assets during the period when they are pledged as collateral. The Company can decide to substitute an asset which is designated as collateral at any time, provided the relevant terms and conditions of the security deed between the cedant and the Company are met.

#### (ii) Fair value hierarchy of financial investments

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

Fair value measurements are based on observable and unobservable inputs. Observable inputs reflect market data obtained from independent sources, while unobservable inputs reflect the Company's view of market assumptions in the absence of observable market information. The Company utilises techniques that maximise the use of observable inputs and minimise the use of unobservable inputs.

The Levels of fair value measurement basis are defined as follows:

Level 1: fair values measured using quoted prices (unadjusted) in active markets for identical assets or liabilities.

Level 2: fair values measured using valuation techniques for all inputs significant to the measurement other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices).

Level 3: fair values measured using valuation techniques for any input for the asset or liability significant to the measurement that is not based on observable market data (unobservable inputs).

The following table presents the Company's assets by IFRS 13 hierarchy Levels:

For the year ended 31 December 2024	Total £m	Level 1 £m	Level 2 £m	Level 3 £m
Equity securities Debt securities Derivative assets	455 609 73	317 440 -	63 73	138 106
Total financial investments at fair value	1,137	757	136	244
Fair value of the debt securities held at amortised cost <sup>1</sup> Fair value of the loan held at amortised cost <sup>1</sup>	223 55	-	- 55	223

<sup>&</sup>lt;sup>1</sup> The table above includes a debt security and a loan held at amortised cost on the Statement of Financial Position at a total value of £357m.

For the year ended 31 December 2023	Total	Level 1	Level 2	Level 3
	£m	£m	£m	£m
Equity securities Debt securities Derivative assets	706	561	-	145
	324	128	74	122
	81	1	80	-
Total financial investments at fair value	1,111	690	154	267
Fair value of the debt securities held at amortised cost <sup>1</sup>	232	-	-	232

<sup>&</sup>lt;sup>1</sup> The table above includes a debt security held at amortised cost on the Statement of Financial Position at a total value of £301m.

# 9. Financial investments (continued)

The Company's financial assets are valued, where possible, using standard market pricing sources, such as IHS Markit, ICE and Bloomberg, or Index Providers such as Barclays, Merrill Lynch or JPMorgan. Each uses mathematical modelling and multiple source validation in order to determine consensus prices, with the exception of OTC Derivative holdings; OTCs are marked to market using an in-house system (Lombard Oberon), external vendor (IHS Markit), internal model or Counterparty Broker marks. In normal market conditions, the Company would consider these market prices to be observable and therefore classify them as Level 1. Where inputs to the valuation have been sourced from a market that is not suitably active the prices have been classified as Level 2. Refer to Level 3 assets section below for methodology.

## (a) Significant transfers between Level 1 and Level 2:

The Company's policy is to re-assess categorisation of financial assets at the end of each reporting period and to recognise transfers between Levels at that point in time. The following table presents the transfers that occurred in the Company during the year:

	Total	Total
	2024	2023
	£m	£m
Transfer into Level 1 from Level 2	28	24
Transfer into Level 2 from Level 1	2	12

# (b) Level 3 assets measured at fair value

The Company holds regular discussion with pricing providers to determine whether transfers or classifications between Levels of the fair value hierarchy have occurred.

	Equity securities 2024 £m	Debt securities 2024 £m	Total 2024 £m	Equity securities 2023 £m	Debt Securities 2023 £m	Total 2023 £m
As at 1 January	145	122	267	153	66	219
Total gains/(losses) for the period:						
- Realised losses	-	(2)	(2)	(3)	(1)	(4)
- Unrealised gains/(losses)	(1)	10	9	-	-	-
Purchases/additions	22	14	36	5	59	64
Sales/disposals	(28)	(33)	(61)	(10)	(2)	(12)
Other	-	(5)	(5)	· -	`-	
As at 31 December	138	106	244	145	122	267

#### Level 3 assets

Level 3 assets, where modelling techniques are used, comprise property, unquoted securities, untraded debt securities and securities where unquoted prices are provided by a single broker. Unquoted securities include suspended securities, investments in private equity and property vehicles. Untraded debt securities include private placements.

In many situations, inputs used to measure the fair value of an asset or liability may fall into different Levels of the fair value hierarchy. In these situations, the Company determines the Level in which the fair value falls based upon the lowest Level input that is significant to the determination of the fair value. As a result, both observable and unobservable inputs may be used in the determination of fair values that the Company has classified within Level 3.

The Company determines the fair values of certain financial assets and liabilities based on quoted market prices, where available. The Company also determines fair value based on estimated future cash flows discounted at the appropriate current market rate. As appropriate, fair values reflect adjustments for counterparty credit quality, the Company's credit standing, and liquidity and risk margins on unobservable inputs.

Fair values are subject to a control framework designed to ensure that input variables and outputs are assessed independent of the risk taker. These inputs and outputs are reviewed and approved by a valuation committee and validated independently as appropriate.

Level 3 investments are included within equity securities and debt securities. A loss of £1m (2023: £4m loss) has been recognised in the Statement of Comprehensive Income in respect of the movement in fair value of these investments.

# 9. Financial investments (continued)

## **Equity securities**

Level 3 equity securities amount to £138m (2023: £145m), of which the majority is made up of holdings of investment property vehicles and private investment funds. They are valued at the proportion of the Company's holding of the Net Asset Value reported by the investment vehicles. Other equity securities are also included that are valued by a number of third party specialists using a range of techniques which depend on the maturity of the underlying investment but can also depend of the characteristics of individual investments. Primarily discounted cash flow models are utilised but for some early stage investments alternate valuation techniques are used such as earnings multiples and transaction values underpinned by analysis of milestone achievement and cash runway.

#### Other financial investments

Other debt securities which are not traded in an active market have been valued using third party or counterparty valuations. These prices are considered to be unobservable due to infrequent market transactions.

Fair values are subject to a control framework designed to ensure that input variables and outputs are assessed independently of the risk taker. These inputs and outputs are reviewed and approved by a valuation committee and validated independently as appropriate.

## (c) Effect of changes in significant unobservable inputs (Level 3) to reasonable possible alternative assumptions

Fair values of financial instruments are, in certain circumstances, measured using valuation techniques that incorporate assumptions that are not evidenced by prices from observable current market transactions in the same instrument and are not based on observable market data.

Where material, the Company assesses the sensitivity of fair values of Level 3 investments to changes in unobservable inputs to reasonable alternative assumptions. The table below shows the impacts of applying these sensitivities on the fair value of Level 3 assets as at 31 December 2024:

		Sensitiv	rities		Sensitiv	ities
	Fair value	Positive	Negative	Fair value	Positive	Negative
	2024	impact	impact	2023	impact	impact
	£m	£m	£m	£m	£m	£m
Equity securities	138	15	(15)	145	18	(18)
Debt securities	106	8	(8)	122	8	(8)
Total Level 3 investments	244	23	(23)	267	26	(26)

Level 3 equity securities have been stressed for sensitivities to movements in equity markets (+/- 25%), credit spreads (+/- 100bps), property values (+/- 15%) and interest rates (+/- 50bps).

Level 3 debt securities have been stressed for sensitivity to movements in interest rates and credit spreads.

## 10. Derivative assets and liabilities

The contractual undiscounted cash flows in relation to derivatives have the following maturity profile:

	Maturity profile of undiscounted cash flows						
	Fair	Within	1-5	5-15	15-25	Over	
	values	1 year	years	years	years	25 years	Total
As at 31 December 2024	£m	£m	£m	£m	£m	£m	£m
Cash inflows							
Derivative assets	73	33	91	71	20	3	218
Derivative liabilities	(67)	220	83	75	30	9	417
Total	6	253	174	146	50	12	635
Cash outflows							
Derivative assets	73	(28)	(70)	(41)	(11)	(1)	(151)
Derivative liabilities	(67)	(188)	(102)	(100)	(37)	(10)	(437)
Total	6	(216)	(172)	(141)	(48)	(11)	(588)
Net derivative cash flows		37	2	5	2	1	47

	Maturity profile of undiscounted cash flows						
	Fair	Within	1-5	5-15	15-25	Over	
	values	1 year	years	years	years	25 years	Total
As at 31 December 2023	£m	£m	£m	£m	£m	£m	£m
Cash inflows							
Derivative assets	81	210	105	98	33	9	455
Derivative liabilities	(66)	58	29	11	1	-	99
Total	15	268	134	109	34	9	554
Cash outflows							
Derivative assets	81	(144)	(91)	(81)	(32)	(9)	(357)
Derivative liabilities	(66)	(73)	(43)	(21)	(2)	-	(139)
Total	15	(217)	(134)	(102)	(34)	(9)	(496)
Net derivative cash flows		51	-	7	-	-	58

The Company uses derivatives to reduce market risk. The most widely used derivatives are over the counter and exchange-traded swaps. The Company may use futures to facilitate efficient asset allocation. In addition, derivatives are used to improve asset-liability matching and to manage interest rate, inflation rate and foreign exchange risk. Derivative counterparty risk is managed by the posting of collateral on a daily basis.

## 11. Deferred tax

Deferred tax is calculated on differences between the accounting value of assets and liabilities and their respective tax values. Deferred tax is also recognised in respect of unused tax losses to the extent it is probable that future taxable profits will arise against which the losses can be utilised. Deferred tax is charged or credited to the Statement of Comprehensive Income, except when it relates to items charged or credited directly to equity.

During 2023 the Bermudian Government enacted a local corporate income tax (CIT) with effect from 1 January 2025, which would apply to Legal & General Reinsurance Company Limited. This was substantively enacted as at 31 December 2023 and deferred tax on temporary differences and unused tax losses relating to our Bermudan businesses were re-valued from 0% to 15%.

This resulted in a deferred tax asset of £336m (2023: £336m) as at 31 December 2024. The deferred tax asset is recognised in respect of tax reliefs permitted under the Bermuda CIT regime which give rise to deductible temporary differences. The majority of these reliefs are expected to unwind from 2025 over 10 years on a straight line basis. The Company expects to have sufficient future taxable profits to offset the unwind of these deductible temporary differences.

The deferred tax balances are as follows:

	As at 31	As at 31
	December	December
	2024	2023
	£m	£m
Deferred tax assets	336	336
As at 31 December	336	336

Deferred tax assets have been recognised for the following types of temporary differences and unused tax losses. The movement in these balances during the year is as follows:

	Net tax asset as at 1 January 2024 £m	Tax (charged)/ credited to the income statement £m	Tax (charged)/ credited to OCI or equity £m	Net tax asset as at 31 December 2024 £m
Difference between the tax and accounting value of insurance contracts	336	-	-	336
Deferred tax assets	336	-	-	336
	Net tax asset as at 1 January 2023 £m	Tax (charged)/ credited to the income statement £m	Tax (charged)/ credited to OCI or equity £m	Net tax asset as at 31 December 2023 £m
Difference between the tax and accounting value of insurance contracts	-	336	-	336
Deferred tax assets	-	336	-	336

# 12. Cash and cash equivalents

	Total 2024 £m	Total 2023 £m
Cash at bank and in hand	19	12
Total cash and cash equivalents	19	12

# 13. Share capital

	2024 Number of shares	2024 £	2023 Number of shares	2023 £
Authorised share capital: Ordinary shares of US\$1 each	500,000,000	386,953,870	500,000,000	386,953,870
Issued share capital: Fully paid ordinary shares of US\$1 each	388,295,388	300,495,192	388,295,388	300,495,192

In 2014, 250,000 authorised and issued ordinary shares of US\$1.00 were subscribed to by Re Holdings. In October 2019, the Company increased its authorised shares to 500,000,000, of which a further 388,045,388 have subsequently been subscribed to by the same company at US\$1.00 each. There is one class of ordinary shares. All shares issued carry equal voting rights.

The holder of the Company's ordinary shares is entitled to receive dividends as declared and is entitled to one vote per share at shareholder meetings of the Company.

# 14. Insurance contract liabilities

# (i) Insurance contract revenue and expenses

For the year ended 31 December 2024	Annuities £m	Protection £m	Total £m
Insurance revenue			
Amounts relating to changes in liabilities for remaining coverage:  - CSM recognised for services provided	165	2	167
- Expected incurred claims and other insurance service expenses	718	7	725
- Change in the Risk Adjustment for non-financial risk for the risk expired	48	1	49
Premium experience variance relating to past and current service	5	27	32
Total insurance revenue	936	37	973
Total insurance service expenses	(732)	(10)	(742)
Total insurance service result	204	27	231
	Annuities	Protection	Total
For the year ended 31 December 2023	£m	£m	£m
Insurance revenue			
Amounts relating to changes in liabilities for remaining coverage:			
- CSM recognised for services provided	163	3	166
- Expected incurred claims and other insurance service expenses	641	23	664
- Change in the Risk Adjustment for non-financial risk for the risk expired	44	1	45
Premium experience variance relating to past and current service	-	41	41
Total insurance revenue	848	68	916
Total insurance service expenses	(636)	11	(625)
Total insurance service result	212	79	291

# (ii) Insurance contracts

	Assets 2024 £m	Liabilities 2024 £m	Assets 2023 £m	Liabilities 2023 £m
Insurance contracts issued Annuities Insurance contract balances	-	(453)	9	(419)
Protection Insurance contract balances	-	(85)	-	(61)
Total insurance contracts issued <sup>1</sup>	-	(538)	9	(480)

<sup>&</sup>lt;sup>1</sup>£(38)m (2023: £(41)m) of the insurance contract balance of £(538)m (2023: £(480)m) is expected to run off within 12 months.

# (iii) Annuities - Insurance contracts issued

(a) Reconciliation of the liability for remaining coverage and the liability for incurred claims

	Liability for rema	Liability for remaining coverage		_	iability for remaining coverage			
	Excluding		Liability		Excluding		Liability	
	loss	Loss	for incurred		loss	Loss	for incurred	
	component	component	claims	Total	component	component	claims	Total
	2024	2024	2024	2024	2023	2023	2023	2023
	£m	£m	£m	£m	£m	£m	£m	£m
Opening insurance contract liabilities	419	-	-	419	406	-	-	406
Opening insurance contract assets	(9)	-	-	(9)	(16)	-	-	(16)
Net balance as at 1 January	410	-	-	410	390	-	-	390
Insurance Revenue	(936)	-	-	(936)	(848)	-	-	(848)
Insurance service expenses								
Incurred claims and other insurance service expenses - experience adjustment	-	-	732	732	-	-	636	636
Insurance service expenses	-	-	732	732	-	-	636	636
Insurance service result	(936)	-	732	(204)	(848)	-	636	(212)
Finance expenses from insurance contracts	30	-	-	30	34	-	-	34
Total amount recognised in comprehensive income	(906)	-	732	(174)	(814)	-	636	(178)
Investment components  Cash flows	(9)	-	9	-	(53)	-	53	-
Premiums received	959	-	-	959	435	_	-	435
Claims and other directly attributable expenses	-	-	(741)	(741)	454	-	(689)	(235)
Insurance acquisition cash flows	(1)	-	-	(1)	(2)	-	-	(2)
Total cash flows	958	-	(741)	217	887	-	(689)	198
Closing insurance contract liabilities Closing insurance contract assets	453 -	-	-	453 -	419 (9)	-	-	419 (9)
Net balance as at 31 December	453	-	-	453	410	-	-	410

The annuities insurance liability includes the funds withheld balance of £18,140m (2023: £18,314m).

Premiums received includes -£178m (2023: -£1,736m) of funds withheld.

This table does not include Deferred Acquisition Costs which are presented separately in Note 14 (vii).

# (iii) Annuities - Insurance contracts issued (continued)

(b) Reconciliation of the measurement components of insurance contract liabilities

Opening insurance contract liabilities	Present value of future cash flows 2024 £m	Risk adjustment for non- financial risk 2024 £m	CSM 2024 £m	Total 2024 £m	Present value of future cash flows 2023 £m	Risk adjustment for non- financial risk 2023 £m	CSM 2023 £m	Total 2023 £m 406
Opening insurance contract assets	(32)	4	19	(9)	(31)	3	12	(16)
Net balance as at 1 January	(2,026)	253	2,183	410	(1,677)	210	1,857	390
Changes that relate to current service CSM recognised for services provided Change in the Risk Adjustment for non- financial risk for risk expired		- (48)	(165) -	(165) (48)	-	- (44)	(163) -	(163) (44)
Experience adjustments  Total changes that relate to current service	9	(48)	(165)	(204)	(5)	(44)	(163)	(212)
Changes that relate to future service Changes in estimates which adjust the CSM Contracts initially recognised in the period  Total changes that relate to future service Insurance service result  Finance (income)/expenses from insurance contracts	(36) (38) (74) (65)	(34) 3 (31) (79)	70 35 105 (60)	(204)	(258) (215) (473) (478)	(15) 51 36 (8)	273 164 437 274	(212)
Total amount recognised in comprehensive income	(138)	(41)	5	(174)	(547)	43	326	(178)
Cash flows Premiums received Claims and other directly attributable expenses Insurance acquisition cash flows	959 (741) (1)			959 (741) (1)	435 (235) (2)			435 (235) (2)
Total cash flows	217	-	-	217	198	-	-	198
Closing insurance contract liabilities Closing insurance contract assets	(1,927) (20)	209 3	2,171 17	453 -	(1,994) (32)	249 4	2,164 19	419 (9)
Net balance as at 31 December	(1,947)	212	2,188	453	(2,026)	253	2,183	410

The annuities insurance liability includes the funds withheld balance of £18,164m (2023: £18,314m). Premiums received includes -£178m (2023: -£1,736m) of funds withheld.

This table does not include Deferred Acquisition Costs which are presented separately in Note 14 (vii).

# (iii) Annuities - Insurance contracts issued (continued)

(c) Impact of contracts recognised in the year

		Of which i	elates to:		Of which	relates to:
	Total impact of contracts	Transfers	Contracts initiated	Total impact of contracts	Transfers	Contracts initiated with
		or business	loss	recognised	or business	loss
	in the year	•	component	in the year		component
	2024 £m	2024 £m	2024 £m	2023 £m	2023 £m	2023 £m
Estimates of present value of cash outflows	-	-	-	-	-	-
Insurance acquisition cash flows	1	-	-	2	-	-
Claims and other insurance service expenses payable	1,676	-	-	2,536	-	-
Estimates of present value of cash outflows	1,677	-	-	2,538	-	-
Estimates of present value of cash inflows	(1,715)	-	-	(2,753)	-	-
Risk Adjustment for non-financial risk	3	-	-	51	-	-
CSM	35	-	-	164	-	-
Increase in insurance contract liabilities from contracts recognised in the year	-	-	-	-	-	-
(d) Amounts determined on transition to IFRS 17						

	New contracts and contracts measured under the full retrospective approach 2024 £m	Contracts measured under the modified retrospective approach 2024 £m	under the fair value	Total 2024 £m	New contracts and contracts measured under the full retrospective approach 2023 £m	Contracts measured under the modified retrospective approach 2023 £m	Contracts measured under the fair value approach 2023 £m	Total 2023 £m
Insurance revenue	149	3	784	936	91	3	754	848
CSM as at 1 January	343	3	1,837	2,183	136	6	1,715	1,857
Changes that relate to current service CSM recognised for services provided Changes that relate to future service	(36)	-	(129)	(165)	(20)	-	(143)	(163)
Changes in estimates which adjust the CSM	49	-	21	70	52	(3)	224	273
Contracts initially recognised in the year	35	-	-	35	164	-	-	164
Total included in insurance service result	48	-	(108)	(60)	196	(3)	81	274
Finance expenses from insurance contracts	23	-	42	65	11	-	41	52
Total recognised in comprehensive income	71	-	(66)	5	207	(3)	122	326
CSM as at 31 December	414	3	1,771	2,188	343	3	1,837	2,183

# (iv) Protection - Insurance contracts issued

(a) Reconciliation of the liability for remaining coverage and the liability for incurred claims

	Liability for rema	Liability for remaining coverage Excluding		Liability Excluding			Liability	
	loss component 2024 £m	Loss component 2024 £m	for incurred claims 2024 £m	Total 2024 £m	loss component 2023	Loss component 2023	for incurred claims 2023	Total 2023 £m
Opening insurance contract liabilities Opening insurance contract assets	(25)		86	61 -	(40)		108	68
Net balance as at 1 January	(25)	-	86	61	(40)	-	108	68
Insurance Revenue	(37)	-	-	(37)	(68)	-	-	(68)
Insurance service expenses Incurred claims and other insurance service expenses - experience adjustment Changes that relate to past service	-	-	47 (37)	47 (37)	-	-	35 (46)	35 (46)
Insurance service expenses	-	-	10	10	-	-	(11)	(11)
Insurance service result	(37)	-	10	(27)	(68)	-	(11)	(79)
Finance expenses from insurance contracts	-	-	2	2	19	-	56	75
Total amount recognised in comprehensive income	(37)	-	12	(25)	(49)	-	45	(4)
Cash flows Premiums received Claims and other directly attributable expenses	48	-	- 1	48 1	64	-	- (67)	64 (67)
Total cash flows	48	-	1	49	64	-	(67)	(3)
Closing insurance contract liabilities Closing insurance contract assets	(14)	-	99 -	85 -	(25)	-	86	61 -
Net balance as at 31 December	(14)	-	99	85	(25)	-	86	61

The Protection inward reinsurance from LGA is written through a new contract every year which triggers a major modification under IFRS 17, resulting in the de-recognition of the existing business within the contract and the re-recognition of this business on the new terms and conditions of the contract, including the new tranche of the business for the year.

# (iv) Protection - Insurance contracts issued (continued)

(b) Reconciliation of the measurement components of insurance contract liabilities

	Present value of future cash flows	for non- financial risk	CSM	Total	Present value of future cash flows	Risk adjustment for non- financial risk	CSM	Total
	2024 £m	2024 £m	2024 £m	2024 £m	2023 £m	2023 £m	2023 £m	2023 £m
Opening insurance contract liabilities Opening insurance contract assets	(384)	106 -	339 -	61 -	(371)	102 -	337 -	68
Net balance as at 1 January	(384)	106	339	61	(371)	102	337	68
Changes that relate to current service CSM recognised for services provided	-	-	(2)	(2)	-	-	(3)	(3)
Change in the Risk Adjustment for non- financial risk for risk expired	-	-	-	-	-	(1)	-	(1)
Experience adjustments	12	-	-	12	(28)	-	-	(28)
Total changes that relate to current service	12	-	(2)	10	(28)	(1)	(3)	(32)
Changes that relate to future service Changes in estimates which adjust the CSM Contracts initially recognised in the year	4 (79)	5 4	(9) 75	-	82 (116)	8 4	(90) 112	
Total changes that relate to future service	(75)	9	66	-	(34)	12	22	-
Changes that relate to past service Adjustments to the liabilities for incurred claims	(37)	-	-	(37)	(47)	-	-	(47)
Insurance service result	(100)	9	64	(27)	(109)	11	19	(79)
Finance (income)/expenses from insurance contracts	(8)	2	7	1	99	(6)	(18)	75
Total amount recognised in comprehensive income	(108)	11	71	(26)	(10)	5	1	(4)
Cash flows								
Premiums received Claims and other directly attributable	49	-	-	49	64	-	-	64
expenses	1	-	-	1	(67)	-	-	(67)
Total cash flows	50	-	-	50	(3)	-	-	(3)
Closing insurance contract liabilities Closing insurance contract assets	(442) -	117 -	410 -	85 -	(384)	106	339	61 -
Net balance as at 31 December	(442)	117	410	85	(384)	106	339	61

# (iv) Protection - Insurance contracts issued (continued)

# (c) Impact of contracts recognised in the year

		Of which I	relates to:	_	Of which i	relates to:
	Total impact of contracts	Transfers	Contracts initiated	Total impact of contracts	Transfers	Contracts initiated with
	recognised	or business acquisition	loss	recognised in the year	or business acquisitions	loss
	2024	2024	2024	2023	2023	2023
	£m	£m	£m	£m	£m	£m
Estimates of present value of cash outflows	-	-	-	-	-	-
Claims and other insurance service expenses payable	35	-	-	24	-	-
Estimates of present value of cash outflows	35	-	-	24	-	-
Estimates of present value of cash inflows	(114)	-	-	(140)	-	-
Risk Adjustment for non-financial risk	4	-	-	4	-	-
CSM	75	-	-	112	-	-
Increase in insurance contract liabilities from contracts recognised in the period	-	-	-	-	-	-

The 'Contracts written in the year' disclosure shows the impact of the new tranche of business for 2024 being written into the reinsurance with LGA.

# (v) Maturity of contractual undiscounted cashflows

	Insuran		
	Annuities	Protection	Total
For the year ended 31 December 2024	£m	£m	£m
Number of years until expected to be recognised			
1 year or less	(155)	(33)	(188)
1 - 2 years	(175)	(32)	(207)
2 - 3 years	(174)	(35)	(209)
3 - 4 years	(170)	(39)	(209)
4 - 5 years	(168)	(41)	(209)
5 - 10 years	(789)	(213)	(1,002)
10 - 20 years	(1,210)	(354)	(1,564)
Over 20 years	(986)	(128)	(1,114)
Total	(3,827)	(875)	(4,702)

	Insuran		
	Annuities	Protection	Total
For the year ended 31 December 2023	£m	£m	£m
Number of years until expected to be recognised			
1 year or less	(163)	(27)	(190)
1 - 2 years	(161)	(33)	(194)
2 - 3 years	(159)	(25)	(184)
3 - 4 years	(158)	(31)	(189)
4 - 5 years	(156)	(33)	(189)
5 - 10 years	(735)	(171)	(906)
10 - 20 years	(1,132)	(345)	(1,477)
Over 20 years	(933)	(142)	(1,075)
Total	(3,597)	(807)	(4,404)

# (vi) CSM maturity profile

For the year ended 31 December 2024	Insuran		
	Annuities	Protection	Total
	£m	£m	£m
Number of years until expected to be recognised			
1 year or less	110	40	150
1 - 2 years	111	23	134
2 - 3 years	111	23	134
3 - 4 years	108	22	130
4 - 5 years	104	21	125
5 - 10 years	457	98	555
10 - 20 years	630	137	767
Over 20 years	557	46	603
Total	2,188	410	2,598

For the year ended 31 December 2023	Insuran		
	Annuities	Protection	Total
	£m	£m	£m
Number of years until expected to be recognised			
1 year or less	114	35	149
1 - 2 years	115	34	149
2 - 3 years	114	30	144
3 - 4 years	112	28	140
4 - 5 years	108	25	133
5 - 10 years	472	95	567
10 - 20 years	643	80	723
Over 20 years	505	12	517
Total	2,183	339	2,522

The amounts presented reflect the amount of CSM amortisation expected to be recognised in insurance service result in future periods. The total amount to be reflected in insurance service result exceeds the carrying value of the CSM as it incorporates the future accretion of interest. Actual CSM amortisation in future periods will differ from that presented due to the impacts of future new business, recalibrations of the CSM and changes in the future coverage units.

# (vii) Deferred acquisition costs

	Annuities 2024 £m	Protection 2024 £m	Total 2024 £m	Annuities 2023 £m	Protection 2023 £m	Total 2023 £m
Opening balance Amounts incurred during the year Amounts derecognised and included in the measurement of insurance contracts	- 1	-	- 1	- 2	-	- 2
	(1)	-	(1)	(2)	-	(2)
Closing balance	-	-	-	-	-	-
Presented in insurance contract assets Presented in insurance contract liabilities		-	-	-	-	
Total	-	-	-	-	-	-

# 15. Investment contract liabilities

## (i) Analysis of investment contract liabilities

	Note	Gross 2024 £m	Gross 2023 £m
Investment contract liabilities	15(iii)	13	22
Total investment contract liabilities		13	22

Investment contracts relate to Fixed Term Annuities reinsured into the Company as part of the reinsurance arrangement with Legal & General Assurance Society Ltd.

## (ii) Expected investment contract liability cash flows

As at 31 December 2024	0-5 years £m	5-15 years £m	15-25 years £m	Over 25 years £m	Total £m	Carrying Value £m
Investment contract liabilities	1	6	11	23	41	13

Investment contract undiscounted cash flows are based on the expected date of settlement. The weighted average discount rate applied for the carrying value is 4.95%.

As at 31 December 2023	0-5 years £m	5-15 years £m	15-25 years £m	Over 25 years £m	Total £m	Carrying Value £m
Investment contract liabilities	1	9	16	32	58	22

Investment contract undiscounted cash flows are based on the expected date of settlement. The weighted average discount rate applied for the carrying value is 4.07%.

## (iii) Movement in investment contract liabilities

As at 1 January Liabilities discharged in the year Effect of change in economic assumptions Investment return and related benefits Investment contract liability divested  As at 31 December  Expected to be settled after 12 months  22 (7) (6) (8) (1) (9) (1) (1) (1) (1) (1) (2) (1) (2) (1) (2) (1) (2) (3) (4) (5) (1) (6) (7) (6) (9) (1) (1) (1) (1) (1) (1) (1) (1) (1) (1		Note	2024 £m	2023 £m
Effect of change in economic assumptions 16 (3) Investment return and related benefits 1 Investment contract liability divested -  As at 31 December 13	As at 1 January		22	225
Investment return and related benefits Investment contract liability divested  As at 31 December  1  1  1  1  1  1  1  1  1  1  1  1  1			(7)	(2)
Investment contract liability divested - As at 31 December 13	Effect of change in economic assumptions	16	(3)	(7)
As at 31 December 13	Investment return and related benefits		1	5
	Investment contract liability divested		-	(199)
Expected to be settled after 12 months 13	As at 31 December		13	22
	Expected to be settled after 12 months		13	22

# 16. Long term insurance valuation assumptions

### Insurance business

The Company only writes long-term insurance business and it seeks to make assumptions about its future experience based on current market conditions and recent experience. The assumptions reflect our best estimate view based on recent experience and expert judgement.

### IFRS discount rates

The interest rates used to discount the cash flows for the purpose of valuing insurance contract liabilities should reflect the timing and liquidity characteristics of the insurance liability cash flows and current market conditions. The valuation interest rate assumptions are derived as interest rate curves with full term structure.

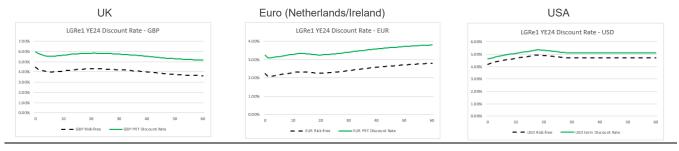
In deriving the liquidity premium assumptions for annuity business, an explicit allowance for risk is deducted from the yield on the assets backing annuity liabilities. The allowance for risk comprises long-term assumptions about defaults and the market risk premiums for taking credit risk. For the UK annuity business, the deduction for risk of default for corporate bonds and direct investments equated to 39bps (2023: 40bps), for European business this was 48bps (2023: 48bps).

For LGA reinsured business, the yield is derived based on notional asset portfolios of AA rated corporate bonds and cash, which reflect the characteristics of the liability cashflows and the assets LGA invest in.

The principal assumptions are:

### 2024

### (i) Rate of interest / discount rate



### 2023

## (i) Rate of interest / discount rate



## **Annuitant Mortality**

Mortality and morbidity assumptions for the UK business are set with reference to standard tables drawn up by the Continuous Mortality Investigation Bureau (CMI), a subsidiary of the Institute and Faculty of Actuaries, and/or UK death registrations. The assumptions related to the business reinsured from LGA are set with reference to standard tables drawn up by the American Academy of Actuaries. Tables are based on industry-wide mortality and morbidity experience for insured lives.

In most cases, mortality rates are set separately for gender and smoker status, and the percentage of mortality table will vary for the first 2-5 years of the policy's duration to allow for underwriting selection.

## 16. Long term insurance valuation assumptions (continued)

Mortality tables	2024	2023
Non-linked individual assurance business LGA reinsured business <sup>1</sup>	Adjusted VBT2014 Table	Adjusted VBT2014 Table
<b>Annuity Business</b> UK Annuities in deferment <sup>2</sup>	95.3% - 95.5% PxA16_PBO	95.3% - 95.6% PxA16_PBO
UK Vested annuities <sup>2</sup> - Bulk purchase annuities	95.3% - 95.5% PxA16_PBO	95.3% - 95.6% PxA16_PBO
- Other annuities	79.0% - 126.1 PxA16_PBO	79.0% - 131.6 PxA16_PBO

<sup>&</sup>lt;sup>1</sup> Adjustments are made for gender, select period, smoker status, policy size, policy duration and year, issue year, age and calendar year:

- Males: Long Term Rate of 1.75% p.a. up to age 85 tapering to 0% at 110 (unchanged from 2023).
- Females: Long Term Rate of 1.25% p.a. up to age 85 tapering to 0% at 110 (unchanged from 2023).

### **Expenses**

The company monitors its expense experience and carries out detailed investigations regularly to determine the expenses incurred in writing and administering the different products and classes of business. Adjustments may be made for known future changes in the administration processes, in line with the company's business plan, as well as for changes in allocations. An allowance for expense inflation in the future is also made in line with RPI, taking account of both salary and price information.

### **Risk Adjustment**

The Risk Adjustment is the compensation that the Company requires for bearing the uncertainty about the amount and timing of the cash flows that arises from non-financial risk. For the majority of risks, the Company's view on the compensation required for non-financial risks is determined with reference to an 85th percentile confidence level (2023: 85th percentile), calculated using a one-year Value-at-Risk (VaR) measure. This VaR measure reflects the Company's view on how non-financial risks behave (risk distributions), diversification of risks across the Company (risk correlations), and the costs and benefits from reinsurance in place (risk mitigation). Where the Company has less appetite for a risk (and requires proportionally higher compensation) a higher confidence level is used. This is consistent with how risks are priced for and managed across the Company. The calculation uses a capital basis appropriate for the territory, the type of business, and how it is priced.

We have estimated the equivalent confidence level for the entire Company on a multi-year basis, using a weighted average of the key risks. Overall the Company Risk Adjustment as at 2024 is aligned to a c75th percentile multi-year confidence level (2023: 75th percentile) over the full runoff of the portfolio.

The Company calculates its Risk Adjustment at contract level using a Provision for Adverse Deviations (PADs) approach, where adjustments are applied to best estimate non-financial risk assumptions to calculate the Risk Adjustment required over and above the best estimate liability for each contract. These adjustments (which vary by risk) are calibrated such that the total Company Risk Adjustment calculated aligns to the Company's view of compensation for non-financial risks determined with reference to the 85th percentile (as described above) and the Risk Adjustment at contract level is representative of the compensation required by the Company for that contract.

## Persistency assumptions

The company monitors its persistency experience and carries out detailed investigations annually. Persistency experience can be volatile and past experience may not be an appropriate future indicator. The company tries to balance past experience and potential future conditions in setting assumptions about expected long-term average persistency levels.

A summary of the lapse basis for major classes of LGA reinsured business is shown below:

	Lapse rates assume	ed by term
	2024	2023
Term	%	%
10	5.40%	5.50%
15	3.00%	3.00%
20	2.20%	2.20%
25	2.30%	2.40%
30	1.90%	2.00%
35	2.40%	2.50%
40	2.50%	2.50%

Males future mortality improvement term assurance factors of 0.7% to 1.5% p.a (unchanged from 2023).

<sup>•</sup> Females future mortality improvement term assurance factors of 0.5% to 1.0% p.a (unchanged from 2023).

<sup>&</sup>lt;sup>2</sup> For vested and deferred annuities, mortality rates are assumed to reduce according to an adjusted version of the mortality improvement model CMI 2022 (2023: CMI 2021) with the following parameters:

# 16. Long term insurance valuation assumptions (continued)

## Reserves assumptions

Provisions for the liabilities arising under contracts with policyholders are based on certain assumptions. The variance between actual experience from that assumed may result in those liabilities differing from the provisions made for them.

# 17. Payables and other financial liabilities

	Notes	2024 £m	2023 £m
Derivative liabilities Other financial liabilities	10	67 15	66
Collateral received from banks Repurchase agreements	20	15 11 7	11 3
Payables and other financial liabilities	20	100	81
Expected to be settled within 12 months Expected to be settled after 12 months		100 -	16 65

Payables and other financial liabilities settled after 12 months are expected to be settled within five years, with the exception of derivative liabilities, as disclosed in Note 10.

## Fair value hierarchy

Payables and other financial liabilities	Total £m	Level 1 £m	Level 2 £m	Level 3 £m	Amortised cost £m
Derivative liabilities Other financial liabilities Collateral received from banks Repurchase agreements	67 15 11 7	1 - -	66 - - 7	- - -	- 15 11 -
As at 31 December 2024	100	1	73	-	26
Payables and other financial liabilities	Total £m	Level 1 £m	Level 2 £m	Level 3 £m	Amortised cost £m
Derivative liabilities Other financial liabilities Collateral received from banks Repurchase agreements	66 1 11 3	- - - -	66 - - -	- - -	1 11 3
As at 31 December 2023	81	-	66	-	15

There have been no significant transfers between Levels (2023: No significant transfers).

# 18. Contingent liabilities, guarantees and indemnities

## (i) Liquidity facility

The Company has access to a rolling credit facility ('RCF') from Legal & General Group Plc. In the event of a liquidity need the Company can call upon this facility to meet its obligations (See Note 20 (vii)).

### (ii) Letters of Credit Contracts ('LOC')

The Company has issued evergreen letters of credit totaling \$0.15m (2023: \$0.15m), and €31m (2023: €31m).

The Company does not have any other contingent liabilities, guarantees or indemnities (2023: £Nil) arising as part of its normal course of business

## 19. Parent companies

The immediate parent company of Legal & General Reinsurance Company Limited is Re Holdings, a company incorporated in England and Wales. The ultimate holding company for both of those entities is Legal & General Group Plc. These accounts provide information about Legal & General Reinsurance Company Limited as an individual undertaking. Copies of the accounts of the ultimate holding company, Legal & General Group Plc, are available on the Legal & General Group Plc website at <a href="https://group.legalandgeneral.com/en/investors/results-reports-and-presentations">https://group.legalandgeneral.com/en/investors/results-reports-and-presentations</a>.

# 20. Related party transactions

### (i) Insurance

As at 31 December 2024, the Company held net insurance liabilities in respect of the insurance contracts of £322m (2023: £265m) and in respect of investment contracts of £13m (2023: £22m) with respect to insurance to a related party, Legal & General Assurance Society Limited (LGAS). An investment contract funds withheld receivable of £55m (2023: £64m) was reported on the Statement of Financial Position. The Company received £1,136m (2023: £2,171m) of insurance premium and paid £696m (2023: £851m) in claims during the year in respect of annuity business. The Company also paid £344m (2023: received £1,266m) in investment income and paid £42m (2023: £39m) in respect of reinsured investment management expenses to LGAS.

We have transactions with Legal & General America Inc ('LGA'), a related party belonging to Legal & General Group Plc, whereby the Company received £50m (2023: £50m) of insurance premium to cover mortality business via excess of loss insurance agreements and paid £47m (2023: £45m) in claims during the year. The Company held net insurance liabilities of £85m (2023: £61m) in order to cover for this business

## (ii) Investments in Group unit trusts and the Group liquidity funds

The Company held £213m (2023: £474m) of investments in unit trusts, controlled and managed by subsidiary companies of Legal & General Group Plc which are classified as other related parties. The Company made a gain of £8m (2023: £10m gain) from those unit trusts.

## (iii) Other assets

As at 31 December	2024 £m	2023 £m
Premium receivable from Banner Life Insurance Company	24	23
Loan receivable from Legal & General Finance Plc 1	56	-
Debt security issued by Legal & General Finance Plc	301	301
Interest on debt security	7	7
Total	388	331

<sup>&</sup>lt;sup>1</sup> L&G Re provided a loan to Legal & General Finance Plc commencing in October 2024. The loan has a par value of £55m with a coupon payable upon maturity or 4.8%. The valuation at year end incudes the interest accrued. The maturity date of the agreement is 30th October 2026.

# (iv) Payables and other financial liabilities

As at 31 December	2024 £m	2023 £m
LGRB management charges due <sup>1</sup> Investment management charges due	2	2
Total	2	3

<sup>&</sup>lt;sup>1</sup> The management charges due relate to expenses owed by the Company to Legal & General Resources Bermuda. These charges have accrued over the year and relate to the operation costs including employee benefits.

# 20. Related party transactions (continued)

## (v) Other expenses

For the year ended 31 December	2024 £m	2023 £m
LGRB Management charges	10	8
Total	10	8

# (vi) Dividends

During the 2024 financial year, the Company approved and paid £230m (2023: £179m) in dividends to its parent company, Re Holdings.

### (vii) Finance costs

On 20 December 2018, the Company agreed a RCF from its ultimate parent company, Legal & General Group Plc. The facility was renewed on 19 August 2022 until 31 December 2026. The facility available is US\$130m (2023: US\$130m) and a commitment fee of 0.45% (2023: 0.45%) is payable on the undrawn portion of the facility quarterly. The loan balance at the end of the year was £Nil (2023: £Nil). Interest expense from the facility for the year was £459k (2023: £472k).

## 21. Management of capital resources

## Capital management policies and objectives

The Company aims to manage its capital resources to maintain financial strength, ensure policyholder security, meet local capital requirements and maintain the Company's strong financial strength rating which provides a competitive advantage.

#### Capital measures

The Company measures its capital on a number of different bases, including those which comply with the regulatory framework within which the Company operates, and those which the Board of Directors consider most appropriate for managing the business. The measures used by the Company include Bermuda Economic Balance Sheet ('EBS') regulatory capital and a model used in the Company's annual CISSA (Commercial Insurer's Solvency Self-Assessment) exercise. Changes have been introduced to the Bermuda EBS regulatory regime which came into effect 31 March 2024, following a consultation by the Bermuda Monetary Authority.

### **Accounting bases**

Management uses the primary financial statements prepared on an IFRS basis to manage capital and cash flow usage and to determine dividend paying capacity.

### Bermuda statutory requirements

The Company is licensed as a long-term Class E reinsurer under the Bermuda's Insurance Act 1978. Under the Act, the Company is required to maintain a minimum capital and surplus. There are no statutory restrictions on the payment of dividends from retained earnings of the Company as the minimum statutory capital and surplus requirements are satisfied by the share capital and additional paid in capital. However, approval from the Bermuda Monetary Authority must be obtained before the statutory capital is reduced by more than 25% of the previous year's statutory filing. In all cases, the Approved Actuary needs to provide support for any proposed dividends.

### Capital resources

The financial strength of the Company is measured by reference to its Bermudian statutory accounts which are a requirement of all Class E reinsurers. The Company's total capital resources of £934m (2023: £922m) comprise an initial capital contribution received in 2014 from the ultimate parent of £220m, a further £300m of issued share capital to the ultimate parent in 2019 and £414m (2023: £402m) in respect of retained earnings after payment of a £230m dividend in 2024 (2023: £179m).

The Bermuda Monetary Authority have made it optional whether to reflect the deferred tax asset related to the Bermuda CIT in the year ended 31 December 2024 or 31 December 2025. The Company has elected to recognise it in 2025 for the purposes of statutory reporting

These capital resources are in excess of the required minimum capital and solvency requirements.

## Available regulatory capital resource risks

The Company's capital resources are sensitive to changes in market conditions, due to both changes in the value of the assets and to the effect that changes in investment conditions may have on the value of the liabilities. Capital resources are also sensitive to assumptions and experience relating to mortality, longevity and to a lesser extent expenses.

The most significant risks arise from:

- Credit risk: this materialises if the default and downgrade experience of the assets backing the liabilities exceed the reserving assumptions;
- Longevity risk: losses occur if the mortality of annuitants is lower than the assumptions used for reserving; and
- Mortality risk: losses occur if the mortality of reinsured policyholders is higher than the assumptions used for reserving.

## 22. Risk management and control

This section describes the Company's approach to risk management. It covers the overall approach that applies to all risks and includes a detailed review of risks within the Company's business.

#### Insurance risk

Exposure to loss arising from claims experience being different to that anticipated.

Insurance risk is implicit in the Company's insurance business and arises as a consequence of the type and volume of business written and the concentration of risk in particular policies or groups of policies subject to the same risks. Insurance risk is managed with policies for underwriting, pricing, and reinsurance. The Company's insurance risk policy sets out the overall framework for the management of insurance risk. Areas where the Company is primarily exposed to insurance risk are longevity, rates of longevity improvement and mortality. Insurance risk also arises from incomplete scheme demographic data, specifically where information concerning spouses is unavailable (spouse risk).

Pricing is based on a fixed set of assumptions, such as mortality, which consider past experience, recent trends, and expert opinion. Actual experience may vary from the pricing assumptions, leading to profits or losses. Insurance exposures are limited through reinsurance for specific cohorts of business. Overall, the Company seeks to be conservative in its acceptance of insurance risks by establishing strict underwriting criteria and limits.

### Operational risk

Exposure to loss arising from inadequate or failed internal processes, people, systems or external events.

Potential for exposure to operational risk extends to all aspects of the business. The Company has constructed a framework of internal controls to minimise material loss from operational risk events recognising that no system of internal control can completely eliminate the risk of error, financial loss, fraudulent action or reputational damage.

### Concentration risk

Exposure to loss arising from a specific geographic location or type of loss event.

As part of the ongoing risk assessment processes the Company considers the concentration of risk. The Company seeks to manage concentrations by setting limits around the maximum exposure to loss that it can tolerate from a series of related events. Limits set include maximum exposures to single lives, financial instruments and reinsurance balances. Insurance risk may be concentrated in geographic regions, altering the risk profile of the Company. The most significant exposure of this type arises for the Group protection business, where a single event could result in a large number of related claims.

### Market risk

Exposure to loss as a direct or indirect result of fluctuations in the value of, or income from, specific assets.

The Company's exposure to market risk is influenced by one or more external factors, including changes to interest rates, inflation, financial instrument prices, foreign exchange rates and indices of prices or rates.

Significant areas where the Company is exposed to these risks are:

- assets backing insurance contracts;
- assets and liabilities denominated in foreign currencies; and
- other financial assets and liabilities.

The Company's market risk policy sets out the overall framework for the management of market risk. The policy is reinforced by more granular investment policies for long term and other business, which have due regard to the nature of liabilities and guarantees and other embedded options given to policyholders.

The Company is ultimately responsible for the management of market risk. The Company has chosen to outsource the execution of the funds withheld investment risk policy, as noted below, to LGAS. The Company manages market risk using the following methods:

### Asset liability matching

The Company manages its assets and liabilities in accordance with relevant regulatory requirements, reflecting the differing types of liabilities it has on the Company's Statement of Financial Position.

For business such as immediate annuities, which is sensitive to interest rate risk, analysis of the liabilities is undertaken to create a portfolio of securities, the value of which changes in line with the value of liabilities when interest rates change. This type of analysis helps protect profits from changing interest rates. Interest rate risk cannot be completely eliminated, due to the nature of the liabilities and any early redemption options contained in the assets.

The Company holds a range of asset types to meet liabilities and stochastic models are used to assess the impact of a range of future return scenarios on investment values and associated liabilities. This allows the Company to devise an investment strategy which maximises risk-adjusted returns to its shareholder.

## **Derivatives**

The Company uses derivatives to reduce the market risk arising in the funds. The most widely used derivatives are exchange-traded swaps. The Company may use futures to facilitate efficient asset allocation within the long term funds. In addition, derivatives within the long term fund are used to improve asset liability matching and to manage interest rate, foreign exchange and inflation risks. It is the Company's policy that amounts at risk through derivative transactions are covered by cash or corresponding assets and that swaps are collateralised as appropriate to reduce counterparty risk.

## The most significant risks arise from:

#### Interest rate risk

Interest rate risk is the risk that the Company is exposed to lower returns or loss as a direct or indirect result of fluctuations in the value of, or income from, specific assets and liabilities arising from changes in underlying interest rates.

The Company is exposed to interest rate risk on the investment portfolio it maintains to meet the obligations and commitments under its non-linked insurance contracts, in that the proceeds from the assets may not be sufficient to meet the Company's obligations to policyholders.

To mitigate the risk that guarantees and commitments are not met, the Company purchases financial instruments, which broadly match the expected insurance policy benefits payable, by their nature and term. The composition of the investment portfolio is governed by the nature of the insurance liabilities, the expected risk-adjusted rate of return and the expected impact on the capital requirement.

Asset liability matching significantly reduces the Company's exposure to interest rate risk. Sensitivity to interest rate changes is included in Table 5 of Note 22.

### Currency risk

The Company operates internationally and as a result is exposed to foreign currency exchange risk arising from fluctuations in exchange rates of various currencies. The Company has exposure to currency risk from financial instruments held in currencies other than their functional currency. The exchange risks inherent in these exposures are mitigated through the use of derivatives, mainly forward currency contracts, cross currency basis swaps and futures.

The Company aims to maintain sufficient assets in local currency to meet local currency liabilities however movements may impact the value of the Company's shareholder's equity which is expressed in GBP Sterling. This aspect of foreign exchange risk is monitored and managed, against pre-determined limits. These exposures are managed by aligning the deployment of regulatory capital by currency with the Company's regulatory capital requirements by currency. Currency borrowings and derivatives are used to manage exposures within the limits that have been set.

As at 31 December 2024, the Company held net assets of £68m in US dollar (2023: £102m), net assets of £43m in Euro (2023: net liabilities £27m). The Company mitigates exchange rate risk through the use of derivatives such as forward currency contracts.

The Company's management of currency risk reduces the shareholder's exposure to exchange rate fluctuations. The Company's exposure to a 10% movement in the US dollar and Euro exchange rates on an IFRS basis, where the values of economic hedging instruments are reflected at their carrying value as opposed to their notional amounts, would result in a change in net asset value as reflected in the table 1.

Table 1 - Exposure to foreign currency exchange rate movement

	A 10% increa USD:GBP excha		A 10% decrea USD:GBP excha	
	2024 £m	2023 £m	2024 £m	2023 £m
Movement in net assets / (liabilities) attributable to USD exposures	11	(6)	(9)	5
	A 10% increa EUR:GBP excha		A 10% decrea EUR:GBP excha	

## Other price risk

Other price risk is the risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in market prices, other than those arising from interest rate risk or currency risk. These changes may be as a result of features of the individual instrument, its issuer, or factors affecting all similar financial instruments traded in the market.

The Company controls its exposure to geographical price risks by using internal country credit ratings. These ratings are based on macroeconomic data and key qualitative indicators. The latter take into account economic, social and political environments.

Table 2 - Exposure to worldwide equity markets including funds withheld

	2024 £m	2023 £m
Holdings in unit trusts	1,092	1,591
Total equities	1,092	1,591

### Credit risk

Exposure to loss if another party fails to perform its financial obligations to the Company.

The Company's credit risk policy defines the overall framework for the management of credit risk. Credit risk exposures primarily arise in relation to corporate bonds held by the Company and those held by LGAS in relation to the funds withheld.

The Company holds fixed and variable rate securities within the financial investments and funds withheld to back part of its insurance liabilities. Significant exposures are managed by the application and regular review of concentration limits, with allowance being made in the actuarial valuation of the insurance liabilities for possible defaults.

The funds withheld includes LTMs, property lending and sale and leaseback investments. The Company is inherently exposed to the risk of default by a borrower or tenant. Each property lending and sale and leaseback investment transaction is subject to a due diligence process to assess the credit risks implicit in the transaction and confirm that the risk of default has been appropriately mitigated. The Company protects its interests through taking security over the underlying property associated with the investment transaction.

The credit profile of the Company's financial investments and funds withheld which are exposed to credit risk is shown in Table 3 and Table 4. The credit rating bands are provided by independent rating agencies. Credit risk bands are defined using qualitative and quantitative factors that are indicative of the risk of default and are aligned to external credit rating definitions from agencies Standard & Poor's, Moody's, and Fitch. For unrated assets, such as cash and derivatives, not exposed to credit risk, the Company maintains internal ratings which are used to manage exposure to these counterparties.

The carrying amount of assets included in the Statement of Financial Position of £1,923m (2023: £1,843m), represents the maximum credit exposure. No impairment provisions have been made.

Table 3 - Exposure to credit risk

As at 31 December 2024	AAA £m	AA £m	A £m	BBB £m	BB and below £m	Unrated Other £m	Total £m
Government securities	23	302	-	-	-	-	325
Other fixed rate securities	44	19	387	120	7	-	577
Total debt securities	67	321	387	120	7	-	902
Accrued interest	-	2	1	2	-	-	5
Derivatives	-	-	73	-	-	-	73
Cash and cash equivalents	-	7	13	-	-	-	20
Financial assets	67	330	474	122	7	-	1,000
Other assets	-	-	-	-	-	18	18
Total <sup>1</sup>	67	330	474	122	7	18	1,018

<sup>&</sup>lt;sup>1</sup> Of the total debt securities and accrued interest that have been internally rated £47m is rated AAA, £301m A, £4m BBB, £4m BB. Excludes equity securities (listed equity and holdings in unit trusts) which are included in Note 22 Table 2.

There are no impaired or past due financial assets.

As at 31 December 2023	AAA £m	AA £m	A £m	BBB £m	BB and below £m	Unrated Other £m	Total £m
Government securities	40	2	-	-	-	_	42
Other fixed rate securities	33	39	371	132	4	-	579
Total debt securities	73	41	371	132	4	-	621
Accrued interest	-	-	1	2	-	-	3
Derivatives	-	-	81	-	-	-	81
Cash and cash equivalents	-	3	9	-	-	-	12
Financial assets	73	44	462	134	4	-	717
Other assets	-	-	4	-	-	5	9
Total <sup>1</sup>	73	44	466	134	4	5	726

<sup>&</sup>lt;sup>1</sup> Of the total debt securities and accrued interest that have been internally rated £69m is rated AAA, £301m A, £3m BBB, £4m BB. Excludes equity securities (listed equity and holdings in unit trusts) which are included in Note 22 Table 2.

There are no impaired or past due financial assets.

Table 4 - Funds Withheld exposure to credit risk

As at 31 December 2024	AAA £m	AA £m	A £m	BBB £m	BB and below £m	Unrated Other £m	Total £m
Government securities	16	2,713	45	27	-	3	2,804
Other fixed rate securities	251	897	3,242	3,501	79	3,619	11,589
Variable rate securities	49	6	91	173	2	494	815
Lifetime mortgages	-	-	-	-	-	1,738	1,738
Total debt securities	316	3,616	3,378	3,701	81	5,854	16,946
Accrued interest	4	19	41	56	2	26	148
Derivatives	-	104	(1,203)	(37)	-	(139)	(1,275)
Cash and cash equivalents	-	-	56	-	-	-	56
Financial assets	320	3,739	2,272	3,720	83	5,741	15,875
Other assets	-	-	-	-	-	1,684	1,684
Total <sup>1</sup>	320	3,739	2,272	3,720	83	7,425	17,559

<sup>&</sup>lt;sup>1</sup> Of the total debt securities and accrued interest that have been internally rated £111m AA, £254m A, £2,129 BBB, £1,639m BB and below.

There are no impaired or past due financial assets within the portfolios in 2024.

As at 31 December 2023	AAA £m	AA £m	A £m	BBB £m	BB and below £m	Unrated Other £m	Total £m
Government securities	17	1,491	45	22	_	-	1,575
Other fixed rate securities	311	917	3,527	3,922	72	3,418	12,167
Variable rate securities	-	-	90	115	2	402	609
Lifetime mortgages	-	-	-	-	-	1,735	1,735
Total debt securities	328	2,408	3,662	4,059	74	5,555	16,086
Accrued interest	4	15	42	59	1	23	144
Derivatives	-	(243)	(305)	28	-	(34)	(554)
Financial assets	332	2,180	3,399	4,146	75	5,544	15,676
Other assets	-	-	-	-	-	1,817	1,817
Total <sup>1</sup>	332	2,180	3,399	4,146	75	7,361	17,493

<sup>&</sup>lt;sup>1</sup> Of the total debt securities and accrued interest that have been internally rated £104m is rated AA, £1,712m A, £1,538m BB and below.

There are no impaired or past due financial assets within the portfolios in 2023.

## Liquidity risk

The risk that the Company, though solvent, either does not have sufficient financial resources available to enable it to meet its obligations as they fall due, or can secure them only at excessive cost.

The Company's liquidity risk management framework defines the overall framework for the management of liquidity risk. The Company does not seek exposure to liquidity risk in its own right, but recognises that exposure to liquidity risk can arise as a consequence of the markets in which it operates, the products that it writes and through the execution of investment management strategies.

The liquidity risks to which the Company's business may be exposed, primarily stem from low probability events that if not adequately planned for, may result in unanticipated liquidity requirements.

A limited level of contingent liquidity risk is an accepted element of writing contracts of insurance. However, the Company's insurance business seeks to maintain sufficient liquid assets and standby facilities to meet a prudent estimate of the cash outflows that may arise from contingent events. The level of required liquidity to be maintained by insurance funds is identified using techniques including cash flow analysis for ranges of extreme scenarios and stress tests for shock events.

To ensure an appropriate pool of liquid assets are maintained in line with a prudent estimate of cash outflows, the profile of investment assets held to meet future liabilities from writing insurance business are structured to include an appropriate proportion of cash and other readily realisable assets. The required profile is formally defined as part of asset benchmarks provided to the investment managers, with regular management information provided by the investment manager on the actual holding relative to the fund benchmark.

Specific liquidity risks associated with the Company's core product lines and the risk mitigation techniques are as follows:

Annuities: Potential for liquidity risk arises within two specific aspects of the Company's annuity business (i) changes in future pension commitments and (ii) collateral requirements risk hedging strategies.

- (i) Changes in future pension commitments once business has been written, cash outflows for pensions in payment are generally predictable, enabling the Company to structure the liquidity, income and maturity profile of investment assets backing long term liabilities to meet projected cash outflows. Although variations in longevity can alter the duration of outflows over the long term, trends are gradual, providing opportunity to respond with appropriate risk mitigation strategies.
- (ii) Collateral requirements for risk hedging strategies as part of the investment asset management strategy for the Company's annuity business, financial instruments are utilised to manage exposure to fluctuations in interest rates, inflation and foreign currency, which may otherwise result in long term liabilities being unmatched. The use of such financial instruments can require the posting of liquid collateral with counterparties, and as such an appropriate pool of the asset types specified by counterparties must either be held or readily available.

The Company manages its banking relationships, capital raising activities, overall cash and liquidity position and the payment of dividends, with support from its ultimate holding company, Legal & General Group Plc's treasury function. The Company seeks to manage its corporate funds and liquidity requirements on a pooled basis and to ensure the Company maintains sufficient liquid assets and standby facilities to meet a prudent estimate of its net cash outflows. In addition, it ensures that, even under adverse conditions, the Company has access to the funds necessary.

**Protection**: Potential for liquidity risk within the Company's protection businesses may arise should the rate of claims diverge significantly from that anticipated, typically as a consequence of an extreme event.

The risk of being unable to settle claims as they fall due is actively managed with provision being made and cash pools maintained within investment portfolios for a prudent estimate of the potential claims that may arise from in-force business, taking account of extreme events. Such provisions are validated using stress tests. An RCF is provided by Legal & General Finance Plc, should the Company require additional cash to meet claims obligations (See Note 18 (i)). The exposure to pandemic risk has been partially mitigated through an adverse mortality stop-loss reinsurance treaty with third parties.

# Table 5 – Sensitivity analysis including funds withheld

Table 5 shows the impact on post-tax profit and equity, net of reinsurance, under each sensitivity scenario for the insurance business.

			Impact	Impact		
	Impact	Impact	on post-tax	on		
	on post-tax	on	profit	equity	Impact	Impact
	profit	equity	net of	net of	on post-tax	on
	net of	net of	reinsurance	reinsurance	profit	equity
	reinsurance	reinsurance	insurance	insurance	net of	net of
	assets	assets	liabilities	liabilities	reinsurance	reinsurance
	2024	2024	2024	2024	2024	2024
	£m	£m	£m	£m	£m	£m
Financial assets						
1% increase in annuitant mortality			(12)	(12)	(12)	(12)
1% decrease in annuitant mortality			13	13	13	13
5% increase in assurance mortality			(11)	(11)	(11)	(11)
10% increase in maintenance expenses						
100 bps increase in interest rates	(57)	(57)	(143)	(143)	(200)	(200)
50 bps decrease in interest rates	30	30	75	75	106	106
50 bps increase in future inflation expectations			63	63	63	63
Credit spread widens by 100 bps with no change in expected defaults	(44)	(44)	(171)	(171)	(214)	(214)
25% rise in equity markets	20	20	1	1	21	21
25% fall in equity markets	(20)	(20)	(1)	(1)	(21)	(21)
15% rise in property values <sup>1</sup>	12	12	129	129	141	141
15% fall in property values <sup>1</sup>	(12)	(12)	(138)	(138)	(150)	(150)
10bps increase in credit default assumptions			(108)	(108)	(108)	(108)
10bps decrease in credit default assumptions			99	99	99	99
10% Depreciation against GBP - USD	16	16	(5)	(5)	12	12
10% Appreciation against GBP - USD	(13)	(13)	4	4	(10)	(10)
10% Depreciation against GBP - EUR	25	25	(16)	(16)	9	9
10% Appreciation against GBP - EUR	(21)	(21)	13	13	(8)	(8)

<sup>&</sup>lt;sup>1</sup> The impact from residential and commercial properties is included.

			Impact	Impact		
	Impact	Impact	on post-tax	on		
	on post-tax	on	profit	equity	Impact	Impact
	profit	equity	net of	net of	on post-tax	on
	net of	net of	reinsurance	reinsurance	profit	equity
	reinsurance	reinsurance	insurance	insurance	net of	net of
	assets	assets	liabilities	liabilities	reinsurance	reinsurance
	Restated	Restated	Restated	Restated	Restated	Restated
	2023	2023	2023	2023	2023	2023
	£m	£m	£m	£m	£m	£m
Financial assets						
1% increase in annuitant mortality	-	-	(9)	(9)	(9)	(9)
1% decrease in annuitant mortality	-	-	9	9	9	9
5% increase in assurance mortality	-	-	(10)	(10)	(10)	(10)
10% increase in maintenance expenses	-	-	2	2	2	2
100 bps increase in interest rates	(34)	(34)	(97)	(97)	(131)	(131)
50 bps decrease in interest rates	19	19	42	42	61	61
50 bps increase in future inflation expectations	-	-	10	10	10	10
Credit spread widens by 100 bps with no change in expected defaults	(32)	(32)	(156)	(156)	(188)	(188)
25% rise in equity markets	25	25	-	-	25	25
25% fall in equity markets	(25)	(25)	-	-	(25)	(25)
15% rise in property values¹	15	15	134	134	149	149
15% fall in property values <sup>1</sup>	(15)	(15)	(148)	(148)	(164)	(164)
10bps increase in credit default assumptions	-	-	(130)	(130)	(130)	(130)
10bps decrease in credit default assumptions	-	-	120	120	120	120
10% Depreciation against GBP - USD	3	3	(9)	(9)	(6)	(6)
10% Appreciation against GBP - USD	(2)	(2)	7	7	5	5
10% Depreciation against GBP - EUR	-	-	9	9	9	9
10% Appreciation against GBP - EUR	-	-	(7)	(7)	(7)	(7)

<sup>&</sup>lt;sup>1</sup> The impact from residential and commercial properties is included.

The sensitivity analyses do not take into account management actions that could be taken to reduce the impacts. The Company seeks to actively manage its asset and liability position. A change in market conditions may lead to changes in the asset allocation or charging structure which may have a more, or less, significant impact on the value of the liabilities. The analysis also ignores any second order effects of the assumption change, including the potential impact on the Company asset and liability position. In calculating the alternative values, all other assumptions are left unchanged, though in practice, items may be correlated. The sensitivity of the profit to changes in assumptions may not be linear. They should not be extrapolated to changes of a much larger order.

## **Climate Change**

Climate change impacts will emerge through risks that we are already exposed to, with the key existing risk exposures covered by the economic and non-economic sensitivities shown in this section. In addition, given the uncertain nature of the risks from climate change, and the lack of historical data to support decision making, a specific scenario testing approach over a longer term time horizon has been developed by the Group to manage the risks from climate change.

### Modern slavery

Legal & General Group plc and it's global subsidiaries ("Legal & General") recognise that companies have an obligation to ensure that their business and supporting supply chains are slavery free. Legal & General's full modern slavery statement can be found at <a href="https://group.legalandgeneral.com/en/sustainability/growing-our-business-responsibly/supply-chain-and-suppliers">https://group.legalandgeneral.com/en/sustainability/growing-our-business-responsibly/supply-chain-and-suppliers</a>.

## 23. Subsequent events

On 7 February 2025 L&G Group announced that it had agreed the sale of its US insurance entity, comprising its US protection and US pension risk transfer (PRT) businesses, to Meiji Yasuda Life Insurance Company (Meiji Yasuda), a Japanese mutual life insurance company. As part of this transaction, the reinsurance between the Company and Banner Life Insurance Company will be recaptured.

The OECD issued an update to its Administrative Guidance on Article 9.1 of the Global Anti-base Erosion Model Rules on 15 January 2025 to clarify application of the Pillar II rules to certain deferred tax assets existing on transition to the new rules. This update does not of itself change the recognition of the £336m deferred tax asset under Bermuda CIT at year end 2023. The guidance changes the Pillar II treatment of the remaining deferred tax asset balance from 1 January 2027 such that for 2027 onwards it would no longer be considered valid in the calculation of covered taxes for Pillar II purposes. It is not possible to estimate the financial impact of this change. However, it is likely to result in either additional UK top-up tax charges payable by the ultimate parent of L&G Re on Bermudan profits from 2027 or a material reduction in the £336m deferred tax asset in 2025. This new guidance does not represent an adjusting post balance sheet event under IAS 10.