

# With-Profits Operating Principles (WPOP)

Report to Defined Charge Participating Sub-Fund Policyholders  
of Prudential International Assurance for 2021

## Summary

In the opinion of the Prudential International Assurance ('PIA') Board the management of the Defined Charge Participating Sub-Fund ('DCPSF') was consistent with the principles detailed in the With-Profits Operating Principles ('WPOP') over the period 1 January 2021 to 31 December 2021 (inclusive). The PIA Head of Actuarial Function provided a report to the PIA Board which supports this opinion with no exceptions.

The following pages set out the PIA Board's reasons for its opinion stated above.

### 1. Introduction

Insurance companies supervised by the Central Bank of Ireland are required to prepare a With-Profits Operating Principles ("WPOP") document setting out the principles and enduring standards adopted in all aspects of the management of its With-Profits portfolios. The Prudential International Assurance plc Board of Directors ("PIA Board") is responsible for the content of the WPOP. The WPOP is available on the PIA website:

[www.prudential-international.com/financial-report/](http://www.prudential-international.com/financial-report/)

The Defined Charge Participating Sub-Fund ("DCPSF") is owned and managed by The Prudential Assurance Company Limited ("PAC") and the way the DCPSF is managed is described in the PAC Principles and Practices of Financial Management ("PPFM") document. The PPFM is a technical document that describes in detail how the DCPSF is managed and can be found on the PAC website: [www.pru.co.uk/funds/ppfm/](http://www.pru.co.uk/funds/ppfm/). The PPFM applies to all policies covered by the DCPSF WPOP.

PIA policyholders may ultimately be invested in the DCPSF via the following:

#### Unitised With-Profits ("UWP")

- Investment into the Prudential Bond Fund; investment is granted via the Prudential Europe Vie product. This product was originally written by PAC France and was transferred to PIA on 1 January 2019.

#### PruFund

- Investment into the PruFund Range of Funds; the International Portfolio Bond, PIIB and IPB products may be invested in the PruFund Range of Funds.

The Central Bank of Ireland regulations require the PIA Board to produce a written report on the consistency of the management of the DCPSF with the principles in the WPOP. This report is produced annually and is available on the **PIA website**, within six months of the end of the financial year. Alternatively, a copy can be provided upon request by email or by post.

In the opinion of the PIA Board the management of the DCPSF was consistent with the principles detailed in the WPOP over the period 1 January 2021 to 31 December 2021 (inclusive). The PIA Head of Actuarial Function provided a report to the PIA Board which supports this opinion with no exceptions.

Under UK Regulation, the PAC Board must also report annually in writing to its with-profits policyholders on compliance with PAC's obligations relating to its PPFM. In the opinion of the PAC Board, PAC has complied with its obligations in relation to the PPFM over the period 1 January 2021 to 31 December 2021 (inclusive). The report is available on the **PAC website**.

## 2. Determining Pay-out Values, bonuses, profit sharing and smoothing

### Bonus rates for UWP

The bonus rates were set following the approach set out in the WPOP. Bonus declarations covering regular and final bonuses were made on 23 February 2021 and 24 February 2022.

The 2021 and 2022 bonus declarations were reviewed by both the PAC With-Profits Actuary ("WPA") and the PAC With-Profits Committee ("WPC") prior to being approved by the PAC Board. For each bonus declaration, the PAC Board was supplied with sufficient information for it to be comfortable that the declaration was consistent with the requirements of the PPFM.

### Smoothing

The smoothing process was in line with the approach set out in the WPOP for the UWP business.

The DCPSF business is managed with the aim of ensuring that maturity and surrender pay-outs for with-profits policies fall within the target range set of 80%-120% of asset share. This allows a reasonable degree of flexibility to smooth returns in periods of market volatility, and provide more stability in pay-outs. It also provides greater certainty to policyholders and minimises the risk of customers not receiving their fair share of the fund return, or of receiving payments which are more than the fund can afford and to the detriment of the remaining policyholders.

PruFund investments are subject to separate smoothing constraints where the automatic smoothing mechanism ensures that almost all claims will fall within 10% of the underlying value of assets.

### PruFund range of Funds

The setting of PruFund Expected Growth Rate's ("EGR") and the smoothing process were in line with the approach set out in the WPOP.

Policies invested in the PruFund range of Funds participate in profits via an increase in the unit price of the selected Fund at the relevant EGR subject to adjustments when the unit price moves outside specified limits. EGRs were set quarterly on 25 February 2021, 25 May 2021, 25 August 2021 and 25 November 2021 by the PAC Board following consultation with the WPA. The WPC is also informed of the EGRs declared. As noted in the 2020 report to policyholders, EGRs for all PruFund Funds were reduced slightly at the May 2020 quarter date reflecting the adverse impact that COVID 19 had on market conditions and the global economic outlook. The EGR for one PruFund fund was increased in May 2021. EGRs for all other PruFund Funds remained at the same level at each quarter date in 2021. Upward Unit Price Adjustments (UPAs) were triggered during 2021 across some funds.

As set out in the WPOP, a unit price reset and/or temporary suspension of smoothing are discretionary actions available to the PAC Board, if required, to manage smoothing profits or losses; or to protect PAC's With-Profits Fund and the interests of all with-profits policyholders. Smoothing was not suspended in 2021. On the 25th August 2021 we applied a unit price reset to all existing PruFund Funds. The decision to apply a Unit Price Reset (UPR) was taken with reference to our ongoing monitoring of the PruFund smoothing mechanism and approved by the PAC board, having taken advice from the WPA and WPC.

## 3. Leaving the DCPSF

Surrender values were determined in line with the approach detailed in the WPOP.

Surrender values and Market Value Reductions (MVRs) were monitored during 2021 to ensure that they remained appropriate. No change was made to the MVR policy during 2021 however market conditions are regularly monitored and surrender and/or MVR practice can change at any time without prior notice.

## 4. The Investment Strategy of the DCPSF

The investment strategy of the DCPSF and the management of investment risk was in line with the approach detailed in the WPOP. The investment strategy is regularly monitored by PAC and PIA were provided with details of the strategy and rationale behind it. Any proposals for changes in investment strategy are put before the PAC Board for approval.

The PAC Board and WPC continue to keep investment strategy under review to ensure that the with-profits funds continue to achieve an appropriate balance between risk and return while maintaining adequate diversification and ensuring the protection of policyholders' interest.

Over 2021 M&G plc (PAC's parent company) continued to develop its approach to sustainable investing by further embedding Environmental, Social and Governance (ESG) measures into its investment processes. The PAC Board and WPC are fully supportive of these developments. As part of this, in February 2021, M&G plc announced that it would allocate £5 billion from PAC's With-Profits Fund into privately-owned enterprises working to create a more sustainable world. For further information on M&G plc's sustainability plans see: [www.mandgplc.com/sustainability/sustainability-report](http://www.mandgplc.com/sustainability/sustainability-report)

## 5. The Risks which may affect DCPSF Policyholders

The business risks were managed following the approach detailed in the WPOP.

The PAC Board continually monitors the business risks and approves any management actions required to protect the security of the with-profits funds and limit any adverse impact on with-profits policies. This continued to be the case during 2021.

The PIA approach to managing its business risks is detailed in section B.3 of the PIA SFCR which is available on our website: [www.prudential-international.com/financial-report/](http://www.prudential-international.com/financial-report/).

## 6. Charges and Expenses

The charges and expenses for DCPSF business were in line with the approach in the WPOP.

The charges on DCPSF business were not amended during 2021.

## 7. The Inherited Estate

The inherited estate of a with-profits fund is the amount of money in a with-profits fund in excess of the amounts that a company expects to pay out to meet its obligations to existing policyholders. The DCPSF does not have an inherited estate, rather it benefits from the use of the inherited estate that has built up in PAC's With-Profit Sub-Fund ("WPSF"). This is a different with-profits sub-fund which is owned by PAC.

The management of the Inherited Estate was in line with the approach in the WPOP.

In its financial management of the WPSF, the PAC Board considers the financial position of the inherited estate.

A number of separate asset pools are maintained within the WPSF. There are separate asset pools for the assets backing asset shares and those backing the inherited estate. This enables the inherited estate to follow a different investment strategy to that for the assets supporting asset shares in order to help meet guarantees and maintain regulatory solvency in adverse market conditions.

Currently the assets backing the inherited estate are mainly invested in fixed interest securities and cash. This was reviewed during 2021 and no change in investment strategy was recommended.

## 8. Equity Between Policyholders invested in the DCPSF and Shareholders

The approach to balancing any conflicts of interest between different generations and types of policyholder invested in the DCPSF, and between those policyholders and shareholders was in line with the approach in the WPOP.

Section 6 of this report covers charges and expenses. Bonus rates, smoothing and MVRs are covered in sections 2 and 3 of this report.

## 9. Volumes of New Business and Closing to New Business

The management of new business into the DCPSF was in line with the approach in the WPOP.

PAC sets limits on the capital available to support new business, and the terms on which new business is written, to ensure new sales do not adversely affect existing with-profits policyholders. The new business written during 2021 stayed within the allocated capital budget.

The terms on which new business was written in 2021 met PAC's guidelines to ensure that new business did not adversely affect existing with-profits policyholders. These guidelines are regularly reviewed and are an area in which PAC exercises discretion and the WPC are actively involved. In addition, shareholders currently pay a subsidy to cover any shortfall in the costs of providing certain guarantees in excess of charges taken.

PAC currently has no intention to close the WPSF or the DCPSF to new business, and had no such intention during the period.

## 10. Changes to the WPOP

The WPOP is updated as and when required to reflect significant developments. An updated version of the WPOP was published in June 2021 to remove references to ELAS and PAC France following the CBI confirmation of a derogation from the WPOP requirements for these books of business. The changes do not materially affect the substance of the WPOP.

## 11. Further Information

Further information can be found in your contract conditions and also in the WPOP and PPFM. The WPOP is available on the **PIA website**. The PPFM can be found on the **PAC website**.

[www.pru.co.uk/international](http://www.pru.co.uk/international)

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