

REPORT TO  
WITH-PROFITS  
POLICYHOLDERS  
ON THE SOCIETY'S  
COMPLIANCE WITH  
ITS PRINCIPLES  
AND PRACTICES  
OF FINANCIAL  
MANAGEMENT  
DURING 2022



**NFU Mutual**

INSURANCE | PENSIONS | INVESTMENTS

# SUMMARY

The Board of The National Farmers Union Mutual Insurance Society Limited (the Society) has reviewed the management of the Society's with-profits business for the 2022 financial year (1 January 2022 – 31 December 2022) and is satisfied that it has met its obligations as set out in the Principles and Practices of Financial Management (PPFM).

In reaching this conclusion due regard has been paid to the advice received from the Society's With-Profits Actuary.

Jim McLaren MBE  
Chairman

Nick Turner  
Group Chief Executive

# INTRODUCTION

It is a requirement for directors of insurance companies that write with-profits business to provide with-profits policyholders with an annual statement that explains how the business was managed during the year.

The overarching guidelines that describe how we manage the Society's Long-Term Business Fund are fully documented in the Principles and Practices of Financial Management (PPFM). This report (covering the period 1 January 2022 to 31 December 2022) sets out how we have complied with the PPFM and also provides a summary of the key decisions (e.g. bonus declarations) that have impacted with-profits policyholders during the year.

When reading this report, you may find it helpful to refer to the Society's PPFM and, in particular, the section containing the glossary of terms. For more information about the company you may also like to read the latest Report and Accounts. The PPFM and Report and Accounts are both available on our website [www.nfumutual.co.uk](http://www.nfumutual.co.uk).

# GOVERNANCE OF WITH-PROFITS BUSINESS

The Society has two key roles within its governance structure that provide reassurance that our with-profits business is being managed in accordance with the Society's PPFM – the With-Profits Committee and the With-Profits Actuary.

The With-Profits Committee is a subordinate Committee of the Society's Board that is responsible for monitoring on-going compliance with our PPFM. Throughout 2022, membership and attendance of the Committee has been in line with the requirements set out in the Terms of Reference. The Committee met for the planned four meetings during the year as usual and the Committee Chairman reported formally to the Board on its proceedings after each meeting.

The With-Profits Actuary is responsible for providing the Board with advice on all areas of discretion as they relate to the fair treatment of with-profits policyholders. This includes making recommendations regarding bonus rates, reviewing communications to policyholders and ensuring the interests of with-profits policyholders are considered in a fair and balanced way.

The With-Profits Actuary is also required to comment on the Board's actions with regard to with-profits business and his annual statement can be found in the Appendix to this report.

# COMPLIANCE WITH THE PPFM DURING 2022

## Payouts and Bonus Rates

In April 2022, annual bonus rates for our with-profits products were declared for 2021.

Market interest rates have a direct impact on the returns we can achieve on the assets we hold to back our capital access bond (CAB) policies. We therefore regularly review CAB bonus rates and set CAB interim bonus rates accordingly. This practice is consistent with the PPFM. In 2022, the CAB interim rates in force throughout 2021 were confirmed as the declared rates.

The declared annual bonus rate for with-profits annuities for 2021 was set equal to the level of annual inflation increase. This was in line with the PPFM target to set bonus rates to match annual inflation increases provided the accumulated asset shares support such a declaration.

For the rest of our traditional and unitised with-profits contracts, the declared rates were set equal to the interim rates in force during 2021.

New interim bonus rates were set to take effect from 1 April 2022. The interim bonus rates were increased from their previous levels for the majority of products. This reflected a combination of the anticipated higher future return levels that we expect and the higher than anticipated asset share return in 2021.

The interim bonus rate for traditional with-profits deferred annuity pensions was maintained at zero because the guaranteed benefits for the majority of policies still exceeded the underlying value of the policy.

The interim bonus rate for traditional with-profits pure endowment pensions was also maintained at zero for 2022 because of the reduced scope to pay terminal bonus in the future.

The approach followed to set annual bonus rates was consistent with our PPFM, which states that we set annual bonus rates once a year, or more often if necessary, for unitised with-profits products. The annual bonus rates are available on our website [www.nfumutual.co.uk](http://www.nfumutual.co.uk).

Terminal bonus rates were set monthly for the Select Pension Plan during 2022 and this is our standard practice as set out in the PPFM. The rates were in line with the PPFM rules.

For all other products, terminal bonus rates were declared on 1 January 2022 and 1 July 2022. This is consistent with our current practice outlined in the PPFM, which states that we set terminal bonus rates twice a year or more often if necessary, for these products.

The With-Profits Committee has delegated authority for the With-Profits Actuary to set the Select Pension Plan terminal bonus rates. These are subsequently ratified by the With-Profits Committee and the Board. All other bonus declarations were reviewed and approved by the With-Profits Committee, having taken advice from the With-Profits Actuary, and subsequently ratified by the Board.

Throughout 2022 asset share values, on which terminal bonus rates and therefore payouts are based, were calculated using the methods described in the PPFM. There remains an emphasis on using terminal bonuses to ensure that policyholders receive payouts close to 100% of the underlying asset share where possible, whilst following the smoothing rules defined in the PPFM.

In our opinion, the payouts made to with-profits policyholders during 2022 reflected fair value. We are satisfied that bonus rates were calculated using the methods described in the PPFM and where discretion was applied it was appropriate.

## Surrender and Transfer Value Terms

The surrender and transfer bases were updated at the same time as terminal bonus rates for our traditional and unitised with-profits policies during 2022, with an additional update in November to reflect changes in market outlook. The methods used to set surrender and transfer values were not changed during 2022. The bases used continue to be consistent with the PPFM.

## Target Ranges

The PPFM includes target ranges for payouts for unitised and traditional with-profits business. The target ranges compare the payout to the underlying value of the policy and our aim is to have at least 90% of the payouts falling within these target ranges.

The target ranges published in the PPFM were unchanged in 2022 and were:

- 75% - 125% for traditional with-profits business
- 85% - 111% for unitised business other than with-profits trustee investment plan
- 80% - 120% for with-profits trustee investment plan

The With-Profits Actuary and With-Profits Committee are satisfied that the published target ranges continue to remain appropriate for our with-profits business. The ranges are set to be wide enough to allow us the continued investment freedom to choose the mix of assets that we believe will maximise returns for policyholders, whilst continuing to apply smoothing of payouts in line with the PPFM and customer expectations. For example, we currently invest a significant proportion of assets in equities. Payouts as a proportion of asset shares do vary over time due to differences in actual returns achieved on assets compared to the returns we assumed when we set bonus rates.

We can confirm that during 2022 we complied with the target ranges set out in the PPFM, with

93% of traditional and 100% of unitised payouts falling within range.

The majority of the small number of payouts that fell outside of the target ranges were traditional with-profits policies that had stopped paying regular premiums. Each policy was investigated and the yields underlying the payments were considered to be fair by the With-Profits Committee.

Payouts are regularly monitored against the target ranges during the year in order to provide early warning of any potential divergence from our target ranges.

## Investment Policy during 2022

The mix of assets was the same for all types of with-profits policies, except for the CAB and the Select Pension Plan risk level 2 fund. The risk level 2 fund is a lower risk with-profits fund (in comparison to the risk level 3 fund) that was launched in 2020.

Assets backing the CAB were invested in cash and floating rate notes (FRNs) throughout the year. This is consistent with our current practice in the PPFM. FRNs are bonds which pay a variable rate of interest. They are mostly issued by financial institutions and governments and the interest they pay is usually called a coupon. The coupon is linked to a specified market rate and is re-calculated at regular intervals.

The With-Profits Committee, after considering advice from the With-Profits Actuary, is responsible for advising on appropriate investment constraints for the part of the Long-Term Business Fund that backs asset shares of all other with-profits policies. These investment constraints include limits on the amount that can be invested in illiquid assets and limits on the amount that can be invested in equity shares. The appropriateness of these constraints is reviewed regularly. The investment objectives and constraints for the Long-Term Business Fund are recommended by the With-Profits Committee and approved by the Board and/or Board Investment Committee.

The actual proportion invested in each asset class is determined by our Investment Managers on at least a quarterly basis based on their assessment of which assets offer the greatest potential for future growth at that time. A history of the asset mix at set dates in the risk-level 2 and risk-level 3 funds during 2022 is shown below. The mix changes in between the dates due to the movement in values of the various assets.

Risk Level 2 Fund	01/01/22	01/04/22	01/07/22	01/10/22
UK Equities	15.0%	15.5%	15.5%	15.0%
International Equities	20.0%	19.0%	18.5%	18.5%
Property	11.5%	13.5%	12.5%	12.0%
UK Corporate Bonds	22.6%	22.2%	22.2%	22.2%
Index-Linked Bonds	0.0%	0.0%	0.0%	0.5%
Fixed Interest Gilts	3.0%	5.0%	5.5%	6.0%
International Bonds	9.9%	7.3%	7.3%	7.3%
High Yield Bonds	4.0%	4.5%	4.5%	4.5%
Emerging Market Debt	4.0%	4.0%	4.0%	4.0%
Cash and Other Assets	10.0%	9.0%	10.0%	10.0%

Risk Level 3 Fund	01/01/22	01/04/22	01/07/22	01/10/22
UK Equities	24.0%	24.5%	24.5%	24.0%
International Equities	32.0%	32.0%	31.5%	31.5%
Property	16.5%	17.0%	16.0%	15.5%
UK Corporate Bonds	12.1%	10.5%	10.5%	10.5%
Index-Linked Bonds	0.0%	0.0%	0.0%	0.5%
Fixed Interest Gilts	2.0%	2.0%	2.5%	3.0%
International Bonds	5.4%	3.5%	3.5%	3.5%
High Yield Bonds	2.5%	3.0%	3.0%	3.0%
Emerging Market Debt	2.5%	2.5%	2.5%	2.5%
Cash and Other Assets	3.0%	5.0%	6.0%	6.0%

The investment policy for asset shares continues to be consistent with the PPFM, product documentation and marketing literature and therefore, in our opinion, satisfies policyholder reasonable expectations.



## **Business Risk**

The Board Risk Committee monitor business risks and has acted in the capacity set out in the PPFM. No concerns over risk management were raised in 2022. The With-Profits Committee and Board Risk Committee or Board approve any management actions taken to protect the security of the Long-Term Business Fund and limit any adverse impact on with-profits policyholders.

## **New Business Terms and Volumes**

The level and mix of new business written into the Long-Term Business Fund is regularly monitored. The With-Profits Actuary and With-Profits Committee are satisfied that during 2022 new business was written on terms that we expect to have no adverse effect on the interests of the existing with-profits policyholders in the Fund.

During 2022 levels of new business were regularly monitored to ensure that the volume of new business was broadly in line with our business plan. The With-Profits Actuary and With-Profits Committee were satisfied that the volume of business written was within an acceptable range throughout 2022 and no restriction on new business was therefore necessary.

## **Charges and Expenses**

Detailed expense investigations are periodically undertaken to ensure that the expenses incurred in the Long-Term Business Fund are fairly assigned to the relevant policies. The With-Profits Actuary and With-Profits Committee are satisfied that the current allocation of expenses is fair and equitable.

Any large one-off project costs are borne by the Inherited Estate and therefore do not impact directly on the expenses attributed to policyholders.

The With-Profits Actuary and With-Profits Committee are satisfied that the charges for existing business are expected to cover sufficient expenses and hence the terms continued to be offered are not to the detriment of with-profits policyholders.

## **Management of the Inherited Estate**

The Inherited Estate is the excess of the total assets of the Long-Term Business Fund over the amount required to meet future liabilities to non-profit and with-profits policyholders and other obligations of the Long-Term Business Fund. The Inherited Estate provides the working capital to support current and future business written within the Long-Term Business Fund.

Our with-profits policyholders share in the profits and losses of the Long-Term Business Fund. Therefore, the With-Profits Committee regularly reviews whether it is appropriate to make an additional distribution to existing policyholders from the Inherited Estate, considering fairness between different groups and generations of policyholders. The With-Profits Committee previously agreed and implemented a long-term strategy for distributions from the Inherited Estate with the rate of distribution being subject to annual review. In 2022 the Committee agreed that the Long-Term Business Fund was able to support a long-term affordable rate of 1.25% per annum. The Board approved this level of distribution and the asset share for all with-profits policies, except for CAB, were therefore enhanced by 1.25% in 2022. The long-term affordable rate of distribution will continue to be reviewed annually and may increase or decrease in future years.

The mix of assets held within the Inherited Estate differs from the asset shares and for the rest of the Long-Term Business Fund. However, the investment strategy still aims to maximise investment returns subject to policyholder reasonable expectations and managing levels of risk.

The With-Profits Actuary and With-Profits Committee are satisfied that during 2022 the Inherited Estate was managed in accordance with the rules of the PPFM.

### **Changes to the PPFM**

The PPFM describes how we manage the Society's Long-Term Business Fund. During 2022 we released a new version of the PPFM. All policyholders were sent further details on these changes before this was released. The objective has been to improve the overall structure, use of language, and layout of the document to make it easier to follow. We believe that the changes we have made to the PPFM help provide greater clarity on how the fund is managed.

### **Communication with Policyholders**

The With-Profits Actuary has responsibility for controlling representations made to policyholders by reviewing and signing off documents for policyholder reasonable expectations and PPFM compliance. Documents that have been reviewed during 2022 include key features documents, policy documents, marketing material, our guides to with-profits, our fund guide and annual statements.

When illustrating potential policy payouts all companies use standard growth rates provided by the Financial Conduct Authority (FCA), unless they believe that using lower rates would be more appropriate for their products. During 2022 we used projection rates that were lower than these FCA maximums for all funds, including with-profits, apart from those that were invested solely in equities. We believe the projection rates used for our different funds are appropriate and reflect the mix of assets within the funds and our view of future investment returns. The appropriateness of the rates and illustrations of future benefits is reviewed regularly.

The With-Profits Actuary and With-Profits Committee are satisfied that the illustrations and documentation that is provided to our policyholders comply with relevant regulations and guidance and do not have the effect of misleading with-profits policyholders as to their expectations.

# APPENDIX

## ANNUAL REPORT FROM THE WITH-PROFITS ACTUARY

As With-Profits Actuary for NFU Mutual, I advise the With-Profits Committee and the Board on the management of the with-profits business and the key aspects of discretion that are applied. I am required by the Financial Conduct Authority's rules to report to with-profits policyholders as to whether NFU Mutual's annual report to with-profits policyholders and the discretion exercised by NFU Mutual in respect of the period covered by the report have taken the interests of the with-profits policyholders into account in a reasonable and proportionate manner.

In my opinion and based on the information and explanations provided to me by the Society, discretion exercised by the Society during 2022 did take the interests of the with-profits policyholders into account in a reasonable and proportionate manner.

I am also satisfied that the Society has complied with its PPFM during 2022 and that the annual report to with-profits policyholders prepared by the Board provides an accurate summary of the key decisions that have impacted with-profits policyholders during the year.

In reaching these opinions I have taken into account the relevant rules and guidance issued by the Financial Conduct Authority, the Actuarial Profession and the Board for Actuarial Standards.

Iain Baker  
Fellow of the Institute and Faculty of Actuaries  
With-Profits Actuary  
National Farmers Union Mutual Insurance Society Limited  
June 2023



**NFU Mutual**

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