

CPIC (SH601601, HK02601, LSE CPIC)
Stock Data (ending Dec. 31, 2021)

Total equity base (in million)	9,620
A-share	6,845
H-share	2,775
Total Cap (in RMB million)	233,635
A-share	185,638
H-share (in HKD million)	58,698
6-month highest/lowest	
A-share (in RMB)	29.84/25.59
H-share (in HKD)	25.80/20.95
GDR (in USD)	24.20/20.10

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Premium Income (Unit: in RMB million)

	Jan.- Dec.	Changes	Dec.	Changes
P&C	153,063	3.35%	13,000	7.71%
Life	209,610	0.55%	8,314	41.88%

Regulatory Updates

● CBIRC relaxes rules on insurance fund management

First, the regulator removed restrictions on the number of securities firms or custodians for securities trading by insurance companies, while reducing the frequency of information disclosure on investment capabilities.

Second, it allowed insurance money to invest in equity investment funds controlled de facto by non-insurance financial institutions, and abolished caps on scale of funds raised by a single start-up investment fund that insurance firms can invest in.

Third, allowed GPs of insurance PE fund and its connected insurance firms to exercise full discretion in portfolio proportions, while streamlining the decision-making process of investments in insurance PE funds by insurance companies.

Fourth, abolished requirements for external credit-rating for the establishment and management of debt investment schemes and asset-backed plans by insurance AMCs.

Fifth, annulled requirements for evaluation before conducting the business of “overseas loans guaranteed by domestic firms” .

Sixth, adding proportional limits on investments in non-standard financial products and real estate.

Market analysts believe that the regulator relaxed restrictions on insurance fund investment, and granted more autonomy in decision-making to insurance firms. This will ease the pressure on their investment yields and improve the supervision of insurance funds investment. Insurance funds will be encouraged to increase allocation in standard products, and investment risks in non-standard areas will be curbed. At the same time, it will channel more long-term funds to the multi-tiered capital market.

● CBIRC promulgates new rules on pension insurance firms

Pension insurance companies are banned, in principle, from conducting insurance asset management business, including trustee service and insurance asset management products. Any breaches shall be corrected, in principle, by the end of 2022. Pension insurance firms shall continuously cut back on the business of personal retirement products, which shall be put into run-off by June 30, 2022 and completely cut to zero by the end of 2023.

According to the document, first, pension insurance companies shall be positioned as specialized operations in retirement finance; second, they are encouraged to focus on its central value proposition, such as commercial pension insurance, retirement provision and corporate (occupational) annuity management; third, effective firewalls must be established between different business lines; fourth, there will be policy support for disciplined players. Pension insurance firms are required to submit reports on their company positioning, transformation and business plans by June 30, 2022.

Market analysts viewed the document as a step to increase the focus on

providing long-term and truly retirement-related financial services of pension insurance outfits, which in the short term would impact scale of personal retirement business, but in the long term will push pension insurance firms to contribute more to the 3rd pillar of China's pension system.

● **Regulator boosts long-term mechanisms of commercial health insurance**

Recently, CBIRC issued The Circular on Disseminating the Report on Issues of Commercial Insurance and Recommendations, which highlights inadequate risk protection, lack of professional business management and accumulation of business risks as the key challenges facing the business. The report also put forward the following recommendations.

Enhancing collaboration between multiple parties, including collaboration with the health care sector, cooperation with government agencies, integration of health management and improved use of technology.

Deepening supply-side reform, such as expanding the scope of health insurance via tax incentives, cultivation of health care management professionals and establishment of a compatible actuarial system and underwriting/settlement system, and design of niche products for innovative drugs.

Ensuring sustainability of urban customized medical insurance programs, through improving product design, easing restrictions on the use of individual account of basic medical insurance, reducing mis-selling and expanding funding channels.

Promoting long-term mechanisms, including definition of the scope of benefits of commercial health insurance with dynamic adjustment, improving the compliance, reader-friendliness and transparency of insurance contracts, and exploring supply of more diversified, personalized insurance products and health management services for mid- and high-income people.

● **CBIRC issues Circular on Requirements for Rectification of Bancassurance**

The document allows banking institutions to explore remote voice taping and image recording when selling life/health insurance products via the integrated off-line and on-line mode. The taping/recording shall meet, in principle, regulatory standards of on-site recording to ensure quality, with a waiver of requirement for insurance personnel and insurance applicants appearing within the same frame. Applicants may click the button to confirm having read the Risk Reminder, instead of copying it by hand. First-time name signing must be done by hand, and afterwards "clicking to sign" will do. The remote taping/recording must be conducted on the premises of banking outlets.

● **Incompetent directors and supervisors will face dismissal and compensation loss**

Insurance Association of China recently issued Guidelines on Implementation of Performance Evaluation of Directors and Supervisors of Insurance Companies. Those rated “incompetent” may have to resign or be dismissed by insurance companies following necessary procedures before filing with the regulator, with cuts or even total loss of their remuneration. The evaluation has to cover at least five dimensions: “Good Faith”, “Due Diligence”, “Professionalism”, “Independence & Ethical Standards” and “Compliance.”

Briefing

● CPIC hosts investor call on C-ROSS II

On Dec. 30, 2021, CBIRC issued C-ROSS II standards, and its implementation will start with the 1st quarter solvency report of 2022. Those firms receiving a waiver will have to implement the new rule no later than 2025. On Jan. 6, CPIC hosted an investor call conference on this. Below is a summary of the meeting.

I. An overview of C-ROSS II

Four key changes to C-ROSS II: First, more stringent standards of capital recognition to enhance capital quality. Future surplus on long-term life insurance policies is no longer treated 100% as core capital, and will be rated as different types of capital using different capital return rates. At the same time, its share of the core capital shall not exceed 35%. C-ROSS II also improves standards of recognition of investment property and long-term equity investments, and bans misappropriation of insurance funds through related-party transactions, multiple embedded financial products or complex shareholding structures to purchase capital instruments. Second, it raises requirements for risk computing of minimum capital, adding “look-through” computing of market and credit risks, expanding the scope of interest rate risk to all interest-sensitive assets, and adding the concentration risk, with re-calibration of various risk factors and the addition of a critical illness (CI) morbidity deterioration factor. Third, it improves solvency-related risk management evaluation, optimizing IRR standards, adding requirements for capital planning to enhance forward-looking capital management. It also increases requirements for solvency information disclosure to improve transparency. Fourth, the document improves standards for insurance groups to enhance their supervision, adding “specific risk” of insurance groups in the calculation of minimum capital. In short, the new regime is a vast improvement of the risk-oriented solvency risk management system.

About its impact on CPIC’s solvency margin ratios: With respect to Group, comprehensive and core solvency margin ratios would decline by varying degrees due to solvency changes of our insurance subsidiaries. First,

available capital shrinks considerably as a result of only partial recognition of future surplus on insurance policies of our life subsidiary. Second, minimum capital decreases slightly, mainly because of reduced capital requirement for interest rate risk of the life insurance operation. Third, the newly-added Group specific risk in the calculation of minimum capital does not have much impact on solvency. As for P/C insurance, both comprehensive and core solvency margin ratios would drop, mainly due to increase in minimum capital as a result of higher risk factors across the board. Minimum capital for insurance risk, market risk and credit risk all increases, albeit by varying degrees, and their share remains stable. In terms of life insurance, the core solvency margin ratio drops considerably, largely due to decrease in available capital as future surplus can no longer be treated as available capital in its entirety and its share of the available capital is capped at 35%. The comprehensive ratio declines modestly as a result of capital grading and the caps on proportion of supplementary capital. Minimum capital decreases slightly, largely because there would be much less capital required for interest rate risk, which is part of market risk, even though the minimum capital for insurance and credit risks rises due to higher risk factors. Therefore, the share of market risk in minimum capital decreases.

In a nutshell, the new capital rules re-calibrates, amends and adds to the previous C-ROSS framework, and going forward, capital will be a key constraint for most insurance companies. The new regime is favourable to those well prepared in capital management, business operation and asset quality. We will continue to monitor its impact, take steps based on our realities to ensure that both the quantitative and qualitative constraints on our operation can be duly considered and reflected, so as to further enhance our business management capabilities.

II. Q & A

1. Q: What is the impact of C-ROSS II on EV and NBV?

A: NBV is a key business metric. Under C-ROSS I, EV and VNB evaluation already covered cost of required capital. Under C-ROSS II, the impact of cost of capital on valuation may change. We have started forward-looking research into this in collaboration with consulting firms. As for impact on product margin, we still expect higher NBV margin on protection than that on savings products, though not so much as before. EV and NBV would decline slightly under C-ROSS II.

2. Q: Compared with your peers, are you more or less impacted by C-ROSS II in terms of solvency or valuation?

A: We expect similar impact on key insurance players, with the exception of a small number of firms.

3. Q: You indicated decline of solvency under the new regime,

particularly for the core margin ratio of the life operation. Do you think this may cause your life insurance subsidiary to reduce its dividends to the Group, which, in turn, will affect Group shareholder dividend policy? Do you consider capital raising via shares or debt issuance?

A: We are committed to generating long-term, stable returns for our shareholders, and would determine the dividend level considering a number of factors such as earnings, solvency, OPAT and needs of business development. The simulation testing shows that the reform is likely to have a one-off, instead of prolonged impact on our solvency, and thus would not have material impact on the shareholder dividend policy.

As C-ROSS II requires enhanced capital management, we are exploring more options in capital replenishment. In November 2021, the regulator issued the exposure draft of rules on capital bonds with indefinite terms, and we are studying this document.

4. Q: You issued GDRs in 2020. Given negative impact of C-ROSS II on your subsidiaries, do you consider using GDR proceeds for capital injection?

A: According to the GDR Prospectus, the proceeds will be deployed in emerging business such as fin-tech, health care, etc., supporting the core business of insurance, which we believe will boost new growth drivers going forward. This principle remains unchanged, and the company will use the proceeds based on our development strategies and in a way that would improve the efficiency of capital allocation.

5. Q: Under the new solvency rules, for life insurance, there are caps on future surplus as a share of core capital, the addition of morbidity deterioration factor, etc.; on the P/C side, excess retrogressive mechanism was abolished, etc. Would such changes impact your business strategies for life and P/C insurance respectively?

A: As for life insurance, we persist in a customer-oriented business strategy. Recent business performance seems to indicate growing demand for savings products, while protection business is yet to pick up. NBV is a key performance metric. Under C-ROSS II, though capital rules are more stringent, NBV margin on protection business would still be higher than that on savings. We will continuously review and refine the product strategy to meet business targets while ensuring compliance with capital requirements.

With regard to P/C insurance, under C-ROSS II, in spite of some decline, both comprehensive and core solvency margin ratios can still maintain decent levels. The new rules seek to guide for “return to the basics of insurance” and for enhanced support of the real economy, via arrangements like removal of excess retrogressive mechanisms, differentiation of credit & guarantee insurance, geographical differentiation of catastrophe risks and the addition of a regulating factor for agricultural insurance. In response to these changes, on the one hand, we will optimize mix of liabilities and step up cost

management; on the other hand, we will continue to improve capabilities in risk identification and selection, enhance capital planning through operational centralization and efficient claims management, as well as investment decisions balancing risk and reward. In terms of product strategy, the company will look more closely at capital deployment and capital charges of different product lines under C-ROSS II, while considering net cash-flow requirements, market and customer strategies.

6. Q: The morbidity deterioration factor is expected to lower the NBV margin of CI products. By how much? Would this change your product strategy?

A: Our product and business strategies are customer-oriented. Despite slight adverse impact of C-ROSS II, NBV margin of CI products remains high.

7. Q: The basic risk factors of certain asset classes like long-term equity investments are raised under C-ROSS II. Would this impact your Strategic Asset Allocation (SAA), particularly equity investment?

A: C-ROSS II sets higher risk factors for private equity, long-term equity investments and investment property, which means higher capital charges for these assets. Our projection shows that this would not be a substantial hindrance to our investment in such asset classes. Our current allocation in them is small in the first place, and our solvency position is strong. Given decline of the interest rate, we will adhere to the “dumb-bell shaped” investment strategy, namely, increasing allocation of long-term assets and equity investments.

8. Q: C-ROSS II sets high risk factors for long-term equity investments in non-insurance areas, and given your deployment in businesses seeking to achieve synergy with insurance, would this change impact your strategy?

A: Under C-ROSS II, the basic factor of long-term equity investment in non-insurance industries was raised from 10% to 100%. In our SAA, the share of this kind of long-term equity investment is negligible, whereas most of the investments we made for synergy with insurance do not belong to this asset class. Therefore, the new capital regime has limited impact on our solvency, and in turn would not affect our deployment in new business areas.