

ISSUED
16 July 2013

COMPANY PROFILE	&	FINANCIAL STRENGTH
R E P O R T S		

Hodge Lifetime

AKG

Accessible - Comparative - Independent

Analysis by AKG Actuaries & Consultants Ltd

Background

AKG's Company Profile & Financial Strength Reports are designed to meet the information needs of advisers in assessing the relative strengths of UK long term Insurers/Providers. Two different styles of report are published by AKG - FULL reports and SHORT reports. A FULL report is produced for each of the leading Provider companies in the market, which participate in the production of the reports. For each remaining Provider company which is covered, a SHORT report is produced.

This is a FULL report.

Each report collates relevant information from a range of sources such as a company's returns to the FSA, its Report & Accounts and material provided by the companies themselves, and incorporates expert independent assessment. For FULL report companies, the process is augmented by regular meetings and other communications with AKG.

PLEASE NOTE: This report should be read in conjunction with AKG's User Guide to AKG's Company Profile & Financial Strength Reports, a copy of which is available on-line at www.akg.co.uk.

About AKG

AKG is an actuarially based consultancy specialising in the provision of ratings, information and market assistance to the financial services industry.

Assistance to Provider Companies

AKG assists Providers in: Financial Strength analysis, ratings and presentation, Data and information provision, Actuarial consultancy, Distribution consultancy.

Assistance to Financial Intermediaries

AKG assists intermediaries in: Financial Strength analysis, Best Advice panel services, Data and information provision, Actuarial and technical support.

Regular Reports

AKG publishes the following additional reports to assist Providers and Intermediaries:

AKG Offshore Profile & Financial Strength Reports - covering offshore life assurance companies.

AKG Platform Profile & Financial Strength Reports - covering platform operations.

AKG UK Life Office With Profits Reports - providing further depth in the assessment of with profits funds.

AKG Offshore Life Office With Profits Bond Report - providing further depth in the assessment of offshore with profits bonds.

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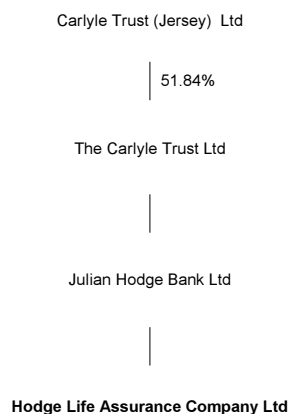
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Group Overview

Hodge Life Assurance Company Limited is a wholly owned subsidiary of Julian Hodge Bank Limited, whose immediate parent is The Carlyle Trust Ltd, which controls and co-ordinates the management of a group of companies. The bank's ultimate parent company and controller is Carlyle Trust (Jersey) Ltd.

Hodge Lifetime is the trading name of Julian Hodge Bank Limited and Hodge Life Assurance Company Limited ("Hodge Life"), and the brand under which equity release and annuity plans are distributed. As a provider of equity release and immediate annuity plans since 1965, when the life company was first incorporated, Hodge Lifetime has been providing equity release plans longer than any other provider in the UK. It was a founder member of SHIP (Safe Home Income Plans, relaunched as the Equity Release Council in May 2012), the equity release trade body, when it was established in 1991. More recently, Hodge Life has moved into the mainstream compulsory purchase annuity (CPA) market, following the launch of a new product in January 2009, subsequently exiting the purchased life annuity (PLA) market in 2010.

Corporate Structure (simplified)



Ratings

Company	Financial Strength Ratings				Supporting Ratings		
	Overall	With Profits	Non Profit	Unit Linked	Service	Image & Strategy	Annual Review
Hodge Life Assurance Company Ltd	B	■	★★★	■	★★★★	★★★	★★★★★

Corporate Data

Ownership Carlyle Trust (Jersey) Ltd
(51.84%)

Open to New Business? Yes

Year Established 1965

Head Office 29, Windsor Place
Cardiff
CF10 3BZ

Tel: 0800 731 4076

Fax: 0845 371 3905

Administration Office As above

Website - Consumer www.hodgelifetime.com

Website - IFA www.hodgelifetime.com

Key Personnel

Chairman	D K M James
Managing Director	D L Jones
Director	D M Austin
Non Exec Director	J J Hodge
Non Exec Director	H G Jones
Non Exec Director	A N Piper
Senior Manager: Operations	J Curtis-Jones
Senior Manager: Sales & Marketing	J Tweed
Head of Actuarial	S J E Gunter
Actuarial Function Holder	O J Gillespie (Milliman)

Company Background

The company was established in 1965 as Home Reversions Ltd and became one of a number of financial services businesses which operated under the Carlyle name in the 1970s. The group has created a wider 'Hodge brand' in recent years, hence the name change for the life company to Hodge Life Assurance Company Ltd in 2001.

[Note: The company changed its year end in 2010 from August to October. All information for the year ending 31 October 2010 therefore relates to a 14 month period, unless otherwise stated.]

Overall Financial Strength

B

The life company is small, but remains well capitalised, notwithstanding a further fall in its CRR coverage in 2012. New business volumes increased significantly, as did profits, and the company did not pay a dividend, preferring to boost its capital resources. It has successfully managed its transition to a focused provider of simple compulsory purchase annuities, albeit this is a market that continues to face a number of challenges. Its new business ambitions appear realistic and significant product development opportunities exist for future further growth. It is looking to source equity release within the life company.

The company now has a viable presence within its chosen niche, from which it should be well placed to take advantage of further opportunities. Success here is now more pivotal within the development of the wider group.

Reinsurance

Approach

The company does not make recourse to any reinsurance.

Analysis of Reserves	2010	2011	2012
	£000's	£000's	£000's
Gross reserves	116,424	142,978	195,970
Reinsurance ceded - external	0	0	0
Reinsurance ceded - internal	0	0	0
Net mathematical reserves	116,424	142,978	195,970

Non Profit Business

General

Non profit is the company's sole business line and consists entirely of annuities. Whilst these have historically been purchased life annuities, the company entered the pensions market with a compulsory purchase annuity in 2009. With this change in focus, pension liabilities will grow in importance in future years, as evidenced in the table below, and now exceed life liabilities, which are trending downwards.

Non Profit Reserves	2010	2011	2012
	£000's	£000's	£000's
UK Life	85,776	76,855	68,146
UK Pensions	30,648	66,123	127,824
Overseas	0	0	0
Total net NP reserves	116,424	142,978	195,970

Non Profit Financial Strength

★★★

Being the only business line, non profit business is afforded the comfort provided by the company, its surplus and the potential backing of the wider group.

Unit Linked Business

The company does not have any Unit Linked business, so this section does not apply.

With Profits Business

The company does not have any With Profits business, so this section does not apply.

Key Financial Data (for y/e: 31/10/12)

Capital Resources	2010 £000's	2011 £000's	2012 £000's
Core tier one capital	53,328	59,229	67,647
Tier one waivers	0	0	0
Other tier one capital	0	0	0
Tier one deductions	-5,445	-9,147	-9,930
Total tier one capital	47,883	50,082	57,717
Tier two capital	0	0	0
Adjustments and deductions	-759	-585	-110
Total Capital Resources	47,124	49,497	57,607
CR outside the fund	0	0	5,000

Capital resources increased further in 2012, as the company again retained its profits rather than paying a dividend. £5m is now held outside the Long Term Fund, providing greater flexibility of capital management.

Long Term Business Admissible Assets	2010 £000's	2011 £000's	2012 £000's
Fixed Interest	0	0	0
Equities	0	0	0
Property	92,468	90,144	82,324
Linked	0	0	0
Other	79,186	108,866	170,486
Total Assets	171,654	199,010	252,810

Unusually for a non profit company, a high proportion of its long term business assets are currently property, reflecting the strategy it has adopted in backing its equity release portfolio. Other assets are predominantly banking deposits or mortgage loans.

Free Assets	2010 £000's	2011 £000's	2012 £000's
Free Assets (Exc Fin Eng)	29,850	30,338	31,697
Financial Engineering	0	0	0
Free Assets (Published)	29,850	30,338	31,697

Free Asset Ratios	2010 %	2011 %	2012 %
FAR (Exc Fin Eng)	17.4	15.2	12.5
FAR (Published)	17.4	15.2	12.5

CRR Coverage Ratios	2010 %	2011 %	2012 %
CRRCR (Exc Fin Eng)	272.8	258.3	222.3
CRRCR (Published)	272.8	258.3	222.3

The company continues its course of steady growth, with increased capital resources, boosted by retained profits, and a further increase in its Capital Resources Requirement (CRR). CRR coverage fell, as did its Free Asset Ratio, albeit both remain good for a non profit operation.

Long Term Business Liabilities & Margins	2010 £000's	2011 £000's	2012 £000's
Non Linked Non Profit	116,424	142,978	195,970
Non Linked With Profits	0	0	0
Accum'lg With Profits	0	0	0
Linked	0	0	0
Surplus c/f	47,124	49,497	52,607
Other liabilities	8,106	6,535	4,233
Investment Reserves	0	0	0
Total Liabilities/Margins	171,654	199,010	252,810

All of the company's policy specific liabilities are non-linked non profit, increasing by 37% in 2012, reflecting the annuities that have been written. The unusually high, and increasing, level of surplus can be clearly seen.

Key Revenue Items	2010 £000's	2011 £000's	2012 £000's
INCOME			
Premiums	24,558	26,697	54,331
Investment Income	1,053	790	801
Investment Increase	9,660	14,354	20,985
EXPENDITURE			
Commissions	370	337	818
Policy claims	13,300	11,745	13,578
Expenses	2,324	1,466	1,939
TRANSFER to P&L	0	0	5,000
INCREASE in fund	19,737	28,927	56,102

Premium income increased by 104% in the year to October 2012. Total acquisition costs increased, but below the rate of new business growth. Maintenance expenses increased by a much lower amount. Claims increased by 15%, with increased CPA payments more than offsetting reduced PLA payments. The result was an increased net inflow of £41m [2011: £15m].

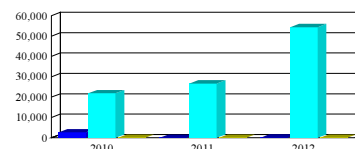
Expense Ratios	2010	2011	2012
New business (% APE)	56.2	41.5	33.7
Renewal (% reg premiums)	n/a	n/a	n/a
Renewal (% p.a. of mean fund)	0.81	0.38	0.41

2012 saw the new business expense ratio reduce again. The renewal expense ratio increased slightly.

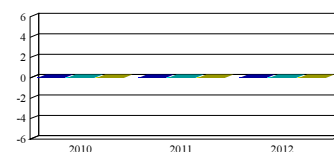
New Business Data (for y/e: 31/10/12)

		Single £000's	Regular £000's
Investment			
Bonds	With Profits	0	0
	Unitised WP	0	0
	Unit Linked	0	0
Endowment	With Profits	0	0
	Unitised WP	0	0
	Unit Linked	0	0
Guaranteed Bonds		0	0
ISA / tax exempt		0	0
Annuities		25	0
Miscellaneous		0	0
Protection			
Whole Life	With Profits	0	0
	Unitised WP	0	0
	Unit Linked	0	0
Term	Ordinary	0	0
	Pension	0	0
IP	Individual	0	0
Critical Illness		0	0
Long Term Care		0	0
Miscellaneous		0	0
Pensions			
Individual	With Profits	0	0
	Unitised WP	0	0
	Unit Linked	0	0
CPA		54,306	0
Bulk Transfer Annuities		0	0
Miscellaneous		0	0
Group Business			
Pension		0	0
Life		0	0
IP		0	0
Critical Illness		0	0
Miscellaneous		0	0
TOTAL DIRECT BUSINESS		54,331	0
Overseas Direct (inc above)		0	0
External Reins (exc above)		0	0
Intra-Group Reins (exc above)		0	0
Industrial Branch (inc above)		0	0

New Single Premiums	2010 £000's	2011 £000's	2012 £000's
UK Life	2,678	3	25
UK Pensions	21,880	26,694	54,306
Overseas	0	0	0
Total (Direct + External Reins)	24,558	26,697	54,331
Growth Rate	332.3%	8.7%	103.5%
Reins Accepted (Intra-Group)	0	0	0



New Regular Premiums	2010 £000's	2011 £000's	2012 £000's
UK Life	0	0	0
UK Pensions	0	0	0
Overseas	0	0	0
Total (Direct + External Reins)	0	0	0
Growth Rate			
Reins Accepted (Intra-Group)	0	0	0



An excellent year's new business performance, reinforcing the company's clear focus towards pension annuities. The company expects similar new business volumes, in line with targets, in 2013.

Distribution

Method

Hodge Lifetime distributes its equity release and annuity products through the intermediary channel. This includes significant use of the primary Avelo Exchange and Assureweb portals, other intermediary owned portals and its own intermediary support function.

The operation distributes its compulsory purchase annuity mainly through specialist annuity advisers, but it has also been successfully increasing its footprint amongst the broader intermediary market. Maintenance of the existing distribution and further growth is likely to be in a considered fashion, in line with its capital and operational capacity.

It deals with intermediaries from a centralised base with a small sales / support structure to supplement it. Post RDR, annuity sales are 67% non-advised and 33% advised.

Distribution Split	Regular Premium %	Single Premium %
Intermediary	0.0	100.0

Image and Strategy

★★★

To date the company's objective has been to match its annuity liabilities with equity release assets, and to grow both businesses in parallel. Having previously acquired equity release from its parent, the intention in future is to effect equity release business directly within the life company as a means of continuing this matching. Its appetite is to grow market share in a controlled and modest way.

2008 saw the launch of the Hodge Lifetime brand, incorporating the group's equity release and annuity businesses. A key part of the strategy is to develop this brand into a recognised retirement brand, primarily within the intermediary market and to a lesser but increasing degree amongst consumers.

The focus of the group's strategy in recent years has shifted much more in favour of Hodge Life and this is continuing. This is bringing with it some change of culture, in line with its youthful development as a 'new' operation relative to the wider group.

Products

Overall Product Philosophy

Hodge Lifetime specialises in two complementary product areas: annuities and equity release.

In the compulsory purchase annuity arena, the goal is to use efficient, low cost administration, coupled with a suitable investment strategy aiming to maintain market-leading annuity rates. A Protected Rights version of the compulsory purchase annuity was launched in April 2011.

Annuity sales enable the company to invest in equity release assets, subject to liquidity, solvency and capital requirements.

Hodge Lifetime has been providing equity release products since 1965, when it launched the first ever reversion scheme, and was a founder member of the equity release trade body SHIP (Safe Home Income Plans), relaunched as the Equity Release Council in May 2012.

Products Currently Marketed

Pension Products

Compulsory Purchase Annuity

Other Products

Equity Release Mortgages

Service

★★★★

Approach

The life company has no employees of its own: all administrative services being provided by Julian Hodge Bank for which an appropriate charge is made.

Hodge Lifetime operates to a number of core values and beliefs related to: Fairness (of pricing); Service (to intermediaries and customers); Simplicity (in products, process and paperwork) and Specialist (in the retirement market). The company considers that this gives it an in-depth understanding of customer needs and therefore enables it to tailor its products and services accordingly.

e-Business

Hodge Lifetime maintains a website which caters for both the intermediary and the end customer.

Key to distribution is availability through The Avelo Exchange and Assureweb intermediary portals.

Service Standards & Awards

Hodge Lifetime has a history of winning awards. In 2013, it was awarded 5 star ratings in the FTAdviser.com Online Service Awards in the 'Life & Pensions' and 'Mortgages' categories, also being named as most improved in the Mortgages category. It also obtained a 4 star award in the 2012 Financial Adviser Service awards. It was also Highly Commended in the 'Most Competitive Annuity Provider' category for the Moneyfacts Life and Pensions Awards 2011 and 2012. In 2011 it was awarded a 4 star rating in the FTAdvisor.com Online Service Awards in the 'Mortgage Lender and Packager' category.

Albeit still relatively young in terms of track record establishment, the company's feedback from customer research is largely very positive.

Internal monitoring of service standards, as delivered by Equiniti Paymaster (rebranded from Xafinity Paymaster), indicate that the operation is meeting or exceeding its required targets.

Outsourcing

Annuity administration, from application through to payment, is outsourced to Equiniti Paymaster.

This relationship is subject to a Service Level Agreement (SLA) with further monitoring as part of the organisation's internal audit.

Investment

Overall Approach

The company invests a significant proportion of its assets in equity release assets (home reversion plans and lifetime mortgages), with the remainder predominantly held as cash.

Funds Under Management

The company remains very small in market terms, having long term assets of £253m, of which £82m comprises property investment. The parent bank's total assets increased by 13% to £803m [2011: £711m] as at 31 October 2012.

Annual Review

★★★★

Hodge Lifetime has continued to pursue its stated strategy and 2012 was a good year for the company, with new business volumes more than doubling as it carved out a niche in the compulsory purchase annuity market.

The company made an increased pre-tax profit of £9.6m [2011: £5.2m]. No dividend was paid. Long term assets increased by 27% to £253m. Pillar I capital resources in excess of the capital resources requirement increased by 4% to £31.7m.

In December 2012, the company introduced changes to its sales processes and systems to comply with the RDR and gender-neutral pricing.

The company increased its holdings of lifetime mortgages by £42m to a total of £131.5m. Holdings of reversionary interests in property reduced by £4.3m to £74.8m at 31 October 2012.

Mortality experience was generally favourable, particularly with regards the PLA book. At the year end, the company held a high level of liquidity, largely as a result of timing differences between the rate of origination of annuities and mortgages. Liquidity is expected to revert to a more normal level in 2013.

Hodge Lifetime designed and launched two new equity release mortgages during the year; one provides the option of future cash withdrawals, whilst both offer the flexibility to repay an element of the loan should the customer's circumstances change.

A Head of Actuarial was appointed as the company looked to develop this expertise in-house.

The immediate parent, Julian Hodge Bank Ltd, made a pre-tax profit of £3.1m [2011: £2.6m], making some progress rebuilding profitability against the backdrop of a difficult market. No dividend was paid and the Tier 1 asset ratio increased to 24.7% [2011: 23.3%]. The Bank sold £33m of equity release mortgages to Hodge Life in 2012 [2011: £25m]. As at 31 October 2012, the Bank had £473m of equity release mortgage assets under management, including £276m for other financial institutions. It increased its deposit base by 14% in 2012 to £659m.

At the group level, The Carlyle Trust Limited saw pre-tax profits increase from £0.4m to £1.2m, paying a dividend of £110k [2011: £110k]. A final dividend of £487k was recommended.

Financial Strength Ratings - Introduction

The aim of AKG's financial strength ratings is to assist IFAs and others to assess the relative strengths of individual provider companies. AKG's concept of 'financial strength' starts with the fundamental issue of a company's ability to meet all of its guaranteed payments to policyholders, but extends beyond this by aiming to factor in the degree to which a policyholder's expectations are likely to be met - or even exceeded - in the long-term. For performance-related products, where the eventual return generally depends largely upon a company's success in consistently delivering superior investment performance, and in containing expense charges, a company's ability to meet expectations is likely to be heavily dependent upon whether or not it is able to sustain its operations in the relevant market, and whether or not it can maintain, or improve, its competitive position.

As a result, AKG believes that, ideally, the evaluation of 'financial strength' should depend upon the type of product under consideration. A particular company may be judged as very strong in the context of one particular product line, but it may be weaker in another context. An illustration of this concept is a company that currently only markets unit linked business, but which has a very small closed block of with profits business, written many years ago. Such a company may be judged as 'good' for unit linked business, whilst considered 'poor' in respect of with profits business.

Since the inception of AKG's Company Profiles and Financial Strength Reports, AKG has consistently promoted and developed the concept of providing financial strength ratings separately for each of the three major product categories - With Profits, Non Profit and Unit Linked.

All AKG's financial strength ratings should be used with care, since even the more detailed approach described above represents something of a simplification. To illustrate this point, for example, the 'Non Profit' category covers a multiplicity of different products. It is clear that slightly different criteria should be used for, say, short-term policies with fully guaranteed terms (e.g. Guaranteed Bonds), than for longer-term policies with terms that can be varied at the company's discretion (e.g. Renewable or Reviewable Term).

AKG assesses financial strength using consistent methodology and objective measures wherever possible, and based on the detailed analysis of the company's particular strengths and weaknesses. The objectives and criteria for each of the financial strength ratings are summarised below:

With Profits Financial Strength Rating

The objective is to assess the overall strength of the company's with profits funds. The initial concern is the company's ability to meet its ongoing guaranteed, or promised, commitments, i.e. existing sum assured and bonuses. However, the company's ability to continue to compete successfully in the with profits market is also particularly relevant, given that closed funds are sometimes bad news for policyholders. In such situations, overall expenses tend to increase as a proportion of the fund and investment performance may well deteriorate. These, together with other factors, may make it difficult for companies in such situations to maintain competitive bonus rates at future declarations, although existing declared bonuses are not affected (other than possibly by MVRs).

The main criteria taken into account are: capital base and free asset position, with profits realistic balance sheet position, the amount of with profits business in-force, parental strength (and likely attitude towards supporting the company), and image and strategy.

NOTE: More detailed analysis of with profits companies is included in AKG's UK Life Office With Profits Report.

★★★★★	Excellent
★★★★	Very good
★★★	Good
★★	Adequate
★	Poor
☐	Not rated

Non Profit Financial Strength Rating

The objective is to assess the company's ability to meet all guaranteed payments arising from such contracts as term plans, annuities etc.

The main criteria taken into account are: free assets, structure (and size) of funds within the company, parental strength (and likely attitude towards supporting the company), and image and strategy.

★★★★★	Excellent
★★★★	Very good
★★★	Good
★★	Adequate
★	Poor
☐	Not rated

Unit Linked Financial Strength Rating

Whilst this is essentially a non profit line, and the primary objective is to assess the company's ability to meet all guaranteed payments arising, AKG also seeks to take into account the extent to which the company is likely to be able to sustain its unit linked operations, and whether or not it is likely to be able to maintain, or improve, its competitive position. Thus strategic issues are also relevant, because of their bearing on the quality of investment management offered, and because of companies' rights to increase charges etc.

The main criteria taken into account are: free assets, structure (and size) of funds within the company, parental strength (and likely attitude towards supporting the company), typical fund performance achievements, and image and strategy.

★★★★★	Excellent
★★★★☆	Very good
★★★☆☆	Good
★★☆☆☆	Adequate
★☆☆☆☆	Poor
☐	Not rated

Overall Financial Strength Rating

The objective is to provide a simple broad-brush indication of the general financial strength of a company. In addition to an assessment of the company's ability to meet all of its guaranteed payments to policyholders, AKG also aims to factor in the degree to which policyholders' expectations are likely to be met - or even exceeded - in the long-term. This involves an assessment of a company's ability to survive in its current form for the long term. The overall rating inherently reflects the mix of business in-force within the company, since different types of policyholder have different expectations, and the company's particular strengths and weaknesses in respect of its key product areas.

The rating takes into account those of the following criteria which are relevant (depending upon the company's mix of business in-force): capital base and free asset position, with profits realistic balance sheet position, structure (and size) of funds within the company, parental strength (and likely attitude towards supporting the company), typical fund performance achievements, and image and strategy.

A	Superior
B+	Very strong
B	Strong
B-	Satisfactory
C	Weak
D	Very Weak

Supporting Ratings - Introduction

Supporting ratings are provided only in full reports, and are assessed at the brand level. AKG assesses three key supporting areas, using consistent methodology and objective measures wherever possible. The aim is to assist IFAs and others to consider the relative merits of the brands that they deal with. AKG's objectives and criteria for each of these ratings are summarised below:

Service Rating

The objective is to assess the quality of the organisation's service to the intermediary market in respect of the brand concerned.

Criteria taken into account include: performance in surveys, awards and benchmarking exercises (external and internal), the organisation's philosophy, service charters, the extent of investments designed to improve service, and feedback from intermediaries.

★★★★★	Excellent
★★★★☆	Very good
★★★☆☆	Good
★★☆☆☆	Adequate
★☆☆☆☆	Poor
☐	Not rated

Image and Strategy Rating

The objective is to assess the effectiveness of the means by which the organisation currently positions itself to distribute its products for the brand concerned and the plans it has to maintain and/or develop its position.

Criteria taken into account include: overall trends in the company's market share position, brand visibility and reputation, feedback from intermediaries and industry commentators, and AKG's view of the company's general strategy.

★★★★★	Excellent
★★★★☆	Very good
★★★☆☆	Good
★★☆☆☆	Adequate
★☆☆☆☆	Poor
☐	Not rated

Annual Review Rating

This is an end of year view for the last year for which Report and Accounts, returns to the FSA, etc., are available, together with comment on any significant post-balance sheet events. It is an assessment of how the brand has fared against its peers, and how it is perceived externally.

Criteria taken into account include: increase/decrease in market shares, expense containment, publicity - good or bad, press or market commentary, regulatory fines, and competitive position.

★★★★★	Excellent
★★★★☆	Very good
★★★☆☆	Good
★★☆☆☆	Adequate
★☆☆☆☆	Poor
☐	Not rated

The logo for AKG, consisting of the letters 'AKG' in a bold, black, sans-serif font.

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AKG is an actuarially based consultancy specialising in the provision of ratings, information and market assistance to the financial services industry

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