In transition

The latest on IFRS 17 implementation

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The IASB concludes its technical discussions on the proposed amendments to IFRS 17, retaining unchanged the annual cohort requirement in IFRS 17

At a glance

On 25 February 2020, the IASB ('Board') completed its deliberations responding to the feedback received on its proposals in the Exposure Draft, 'Amendments to IFRS 17' ('ED'). The Board tentatively decided:

- to confirm, with minor changes, its proposal that coverage units for insurance contracts without direct participation features should be identified considering the quantity of benefits and expected period of investment-return service, if any, in addition to insurance coverage;
- to further amend IFRS 17 to:
  - extend the risk mitigation option for insurance contracts with direct participation features to include non-derivative financial instruments measured at fair value through profit or loss; and
  - provide further specific transition reliefs in the modified retrospective approach and the fair value approach; and
- to finalise a number of minor amendments to IFRS 17, including one intended to resolve an inconsistency in the treatment of income tax receipts and payments included in fulfilment cash flows that had been identified by respondents to the ED.

The Board tentatively decided that it would make no other amendments to IFRS 17. In particular, the Board tentatively decided that it would retain, unchanged, the annual cohort requirement in IFRS 17 and to finalise the editorial correction that would specify that, when assessing whether a contract meets the criteria for the scope of the variable fee approach ('VFA'), an entity should assess the variability of the amounts to be paid to the policyholder over the duration of the insurance contract (rather than over the duration of the *group* of insurance contracts).

The views in this In transition are based on our observations from the 25 February 2020 meeting, and they might differ in some respects from the official report of the meeting that will be published by the IASB in an IASB Update at a later date.

Background

1. On 26 June 2019, the Board published the Exposure Draft, 'Amendments to IFRS 17'. The ED responded to some of the concerns and challenges raised by stakeholders, proposing amendments intended to support entities implementing IFRS 17. The proposals were intended to reduce implementation costs and to make it easier for entities to explain results from applying IFRS 17 to users of financial statements.

2. Since the ED's 90-day comment period ended on 25 September 2019, the Board discussed the feedback from outreach and comment letters on the ED, and it decided on an approach for re-deliberating the matters raised by respondents.

3. As part of that approach, the Board has indicated that:

- It would finalise some of the proposals in the ED without substantive re-deliberation.
- It would not consider further some of the topics identified in the feedback from respondents, thus reducing uncertainty about any possible amendments to IFRS 17.
- It would continue to apply the criteria that the Board set when deciding to propose amendments to IFRS 17. Thus, the Board would seek to ensure that any amendments to IFRS 17 do not:
  - change the fundamental principles of the standard, because that would result in a significant loss of useful information for users of financial statements relative to that which would otherwise result from applying IFRS 17;
  - unduly disrupt implementation already underway; or
  - further delay the effective date of IFRS 17.

4. The amendments to IFRS 17 that the Board tentatively decided to finalise are included in the table at the end of this publication.

Items discussed during the February Board meeting

5. At its February 2020 meeting, the Board discussed the proposals relating to:

- the contractual service margin attributable to investment services;
- the level of aggregation, specifically annual cohorts for insurance contracts with intergenerational sharing of risks between policyholders;
- the risk mitigation option for non-derivative financial instruments at fair value through profit or loss;
- additional transition reliefs; and
- minor amendments and other topics, including an amendment to resolve an inconsistency relating to income tax payments and receipts that are included in fulfilment cash flows.

6. In addition, the Board discussed minor amendments and other topics raised by respondents to the ED.

PwC Observation:

The staff noted that this was another important package of papers that would bring to an end the planned discussions, other than the effective date of IFRS 17 and the extension to the temporary exemption from applying IFRS 9, which would be discussed in March. The Board is also expected to be asked in March for permission to start the balloting process, with the issuance of the final amendments still targeted for mid-2020.

Contractual service margin attributable to investment services

7. The Board tentatively decided to confirm, with minor changes, its proposal that coverage units for insurance contracts without direct participation features should be identified considering the quantity of benefits and expected period of investment-return service, if any, in addition to insurance coverage.

8. Accordingly, IFRS 17 would be amended:

- to require an entity to identify coverage units of insurance contracts without direct participation features considering the quantity of benefits and expected period of investment-return service, if any, in addition to insurance coverage; and
- to require that contracts can only be considered to provide an investment-return service if, and only if:
  - an investment component exists, or the policyholder has a right to withdraw an amount;
  - the entity expects the investment component or amount the policyholder has a right to withdraw to include an investment return; and
  - the entity expects to perform investment activity to generate that investment return.

9. The Board also tentatively decided:

- to require an entity to include, as cash flows within the boundary of an insurance contract, costs related to investment activities to the extent the entity performs such activities to enhance benefits from insurance coverage for the policyholder, even if the entity has concluded that the contract does not provide an investment-return service;
- to confirm its proposals in the ED to require an entity to disclose:
  - quantitative information about when the entity expects to recognise in profit or loss the contractual service margin remaining at the end of a reporting period; and
  - the approach used to determine the relative weight of the benefits provided by insurance coverage and investment-return service or investment-related service; and
- to confirm its proposals in the ED to define in Appendix A to IFRS 17 'insurance contract services' as including:
  - coverage for an insured event (insurance coverage);
  - for insurance contracts without direct participation features, the generation of an investment return for the policyholder, if applicable (investment-return service); and
  - for insurance contracts with direct participation features, the management of underlying items on behalf of the policyholder (investment-related service).

PwC Observation:

We expect that stakeholders will welcome the requirement for an entity to recognise contractual service margin for investment-return services, if any, in addition to insurance coverage. Some will also welcome the requirement for an entity to include, as cash flows within the boundary of an insurance contract, costs related to investment activities to the extent the entity performs such activities to enhance benefits from insurance coverage for the policyholder. However, some will be disappointed that the IASB did not extend the definition of investment-return service in a way that would include deferred annuity contracts in the accumulation phase when the policyholder does not have the ability to withdraw cash or transfer the account balance to another insurance provider.

Determining the relative weighting of coverage units attributed to the different investment-return and insurance services in the same contract remains a judgemental area. The need for judgement will be further increased as entities will need to determine the extent to which entities perform investment activities to enhance benefits from insurance coverage for the policyholder and one Board member cautioned that 'investment activity' would introduce a new term into IFRS 17 that would need to be considered carefully in the drafting. While some will be disappointed that the Board did not provide any practical application guidance, or a practical expedient or exemption that could decrease potential diversity in practice in this area, the Board has struck a balance between providing helpful guidance and disrupting implementation.

Some Board members commented that, although they agreed with the staff recommendation not to amend the terminology throughout IFRS 17, this was a pity, as such a change would have made the standard easier to read. However, they agreed that introducing changes to terminology at this stage of the process would have the risk of too much being read into the changes and much implementation and educational material already produced would need to change, and would not be consistent with the Board's approach of making the minimum changes possible to the standard.

Level of aggregation - annual cohorts for insurance contracts with intergenerational sharing of risks between policyholders

10. In November 2019, the Board noted, from outreach and comment letters, additional information about the balance between the costs and benefits of annual cohort requirements for insurance contracts with intergenerational sharing of risks between policyholders, and it decided that it would consider further that feedback as part of the re-deliberations. In particular, the Board considered the balance of costs and benefits relating to the annual cohort requirement for those contracts.

11. At this meeting, the Board considered:

- an analysis of the steps required to apply the annual cohort requirement to insurance contracts with intergenerational sharing of risks between policyholders;
- an analysis of the costs and benefits for insurance contracts with different features of intergenerational sharing of risks between policyholders;
- an analysis of features of a contract that might result in the costs of the annual cohort requirement outweighing the benefits of the resulting information; and
- an analysis of whether IFRS 17 should include an exemption from the annual cohort requirement for contracts with such features and, if so, what form such an exemption might take.

12. However, the Board noted that it needed to balance the arguments in relation to the specific contracts that might be covered by an exemption against the broader argument that adding an exemption to a standard always adds complexity for users and preparers of financial statements that would disrupt implementation of the standard and reduce the benefits of its ongoing application. In doing so, the Board concluded that:

- the reason for providing an exemption would be that the costs of the annual cohort requirement could exceed the benefits of the resulting information for some contracts. Those costs include the need to apply considerable judgement, in some circumstances, to determine the assumptions and allocations that result in information that faithfully represents the contracts;
- any exemption would need to avoid the risk of losing information about the effect of financial guarantees, that would reduce the benefits of the resulting information, particularly in the current low interest rate economic environment. In low interest rate environments, financial guarantees over returns on underlying items are increasingly likely to take effect, potentially making groups that include such contracts onerous; and
- because of the pressure that would fall on any such exemption, the exemption would need to be robust and well-defined, and that there is therefore no way to specify such an exemption without the use of ‘bright lines’ which would be arbitrary and difficult to justify, and without developing complex criteria which would disrupt implementation of the standard and reduce the benefits of its ongoing application.

13. Therefore, the Board decided to retain, unchanged, the annual cohort requirement in IFRS 17.

PwC Observation:

The annual cohort requirement in IFRS 17 has been one of the most contentious requirements in recent months. The Board did not ask a question on the annual cohort requirement, but it received comments on the requirement as it applies to insurance contracts with intergenerational sharing of risks between policyholders. Those comments were mainly from European stakeholders, but the Board noted that the concern also existed elsewhere. The discussion at this meeting followed the Board’s decision at its November 2019 meeting to consider further the feedback from outreach and comment letters on the annual cohort requirement for contracts that have intergenerational sharing of risks.

The Board noted that the annual cohort requirement provides useful information about when losses make contracts onerous and about trends in profitability, particularly when contracts contain fixed cash flows due to the effect of financial guarantees. The Board also noted that, in some cases, the costs of the annual cohort requirement could be finely balanced against the benefits of the resulting information. This would be the case when contracts that are in the scope of the VFA have cash flows that affect the cash flows of other contracts (sometimes referred to as ‘substantial mutualisation’). Several Board members noted that they had hoped that an exemption for such contracts could be crafted, but had ultimately been persuaded that it would not be possible to do so in a robust way.

Board members commented that, while some preparers had suggested the Board could allow a principles-based exemption, it would be hard to specify a principle for when an exemption to a principle would apply. Usually the Board needs to specify rules for when an exemption would apply. It was also noted that an exemption that was not robust would undermine a foundational element of IFRS 17 and would undermine user confidence in the standard.

In concluding the discussion, the Chair commented that for accounting standards to be solid and prudent, any exemption would need to hold up under stress. While he had encouraged the IASB staff to explore how an exemption might be developed, he had been convinced through the analysis of that process in the paper that any exemption would necessitate ‘bright lines’. Such ‘bright lines’ would immediately be challenged, subject to structuring, and most likely not capture all the contracts that stakeholders believed should be captured. As a result, such an exemption would introduce significant complexity by essentially introducing a third model for some VFA contracts. He did not doubt that the annual cohort requirement would lead to additional costs, but noted that many other features such as the VFA and the OCI option, which had also led to additional costs, had been welcomed by stakeholders. Further, he believed that the annual cohorts requirement would provide information like ‘the canary in the coal mine’ and even if rare, that information would be worth it’.

Applicability of the risk mitigation option - non-derivative financial instruments at fair value through profit or loss

14. The risk mitigation option in IFRS 17 permits an entity to recognise immediately in profit or loss some or all of the changes in the effect of financial risk on insurance contracts with direct participation that usually adjust the contractual service margin. In other words, the risk mitigation option ‘switches off’ the VFA to the extent that financial risk is mitigated.

15. The risk mitigation option in IFRS 17 applies only when the entity has a previously documented risk-management objective and strategy for using derivatives to mitigate financial risk arising from the insurance contracts provided that specified criteria were met. The ED proposed that the risk mitigation option should be extended to when an entity mitigates the effect of financial risk by holding reinsurance contracts. At this meeting, the Board extended the option further, to apply when the entity mitigates the effect of financial risk by holding non-derivative financial instruments at fair value through profit or loss.

16. Accordingly, IFRS 17 would be amended to permit an entity to apply the option when the entity mitigates the effect of financial risk on the fulfilment cash flows set out in paragraph B113(b) of IFRS 17 using non-derivative financial instruments at fair value through profit or loss, provided that the conditions in paragraph B116 of IFRS 17 are met.

17. The Board tentatively decided that it would not permit an entity to apply the risk mitigation option when the entity mitigates financial risk on the changes in the amount of the entity’s share of the fair value of the underlying items using non-derivative financial instruments measured at fair value through profit or loss.

PwC Observation:

The Board’s tentative decision recognises that the accounting mismatches that can arise between non-derivative financial instruments measured at fair value through profit or loss and insurance contracts with direct participation features, created by the VFA, are the same as those that can arise between derivatives and such insurance contracts (for which the Board introduced the risk mitigation option).

The tentative decision means that, while an entity can use the risk mitigation option when it mitigates the financial risk on the fulfilment cash flows in paragraph B113(b) of IFRS 17 using a derivative, reinsurance contract held or non-financial instrument measured at fair value through profit or loss, it can only use the option for changes in the amount of the entity’s share of fair value of the underlying items when it does so using a derivative or reinsurance contract held.

The staff noted that they had received comments on the staff paper that suggested that the risk mitigation option should be extended to non-derivative financial instruments that are measured at FVOCI, or should also apply when the entity mitigates risks relating to the entity’s share of underlying items. The staff commented that it would be contrary to the principle of making the VFA mandatory to allow an entity to have a different accounting treatment when it holds non-derivative financial instruments. One Board member challenged the staff to explain why the risk mitigation option should not be extended to apply when the entity uses financial instruments measured at FVOCI to mitigate risk. The staff noted that doing so would be inconsistent with the approach in IFRS 9 for hedge accounting, would require complexity in identifying ineffectiveness and would not eliminate accounting mismatches in most cases, because the pattern of realisation on the assets would not generally match the unwind of OCI for the insurance contracts.

The tentative decision is also consistent with IFRS 9, which permits non-derivative financial assets and some non-derivative financial liabilities measured at fair value through profit or loss to be designated as hedging instruments.

Additional specific transition modifications and reliefs

18. At previous meetings, the Board has tentatively decided that it would not consider further:

- general suggestions to permit an entity more optionality and flexibility in the modified retrospective approach, or to amend the modified retrospective approach to remove the requirements to use reasonable and supportive information or permit an entity to develop its own additional modifications; or
- permitting any reliefs within the full retrospective approach because doing so would contradict the objective of the full retrospective approach and would reduce the usefulness of information for users of financial statements.

19. At this meeting, the Board tentatively decided to amend the transition requirements in IFRS 17 to:

- extend the modification in the modified retrospective approach and relief in the fair value approach relating to assessments that would have been made at inception or on initial recognition of whether an investment contract meets the definition of an investment contract with discretionary participation features;
- amend the proposed modification in the modified retrospective approach for reinsurance contracts held when underlying insurance contracts are onerous. The amendment would specify that if an entity does not have reasonable and supportable information to identify whether the reinsurance contract held was acquired before or at the same time that the insurance contracts were issued, the entity would assume that the reinsurance contract held was acquired after the insurance contracts were issued; and
- add a modification to the modified retrospective approach for entities that make an accounting policy choice *not* to change the treatment of accounting estimates made in previous interim financial statements. Applying the modification, the entity would determine the contractual service margin, loss component and amounts related to insurance finance income or expenses at the transition date as if the entity had not prepared any interim financial statements before the transition date.

20. The Board also considered, but did not decide to amend IFRS 17, to respond to the following categories of suggestions:

- amending existing modification in the modified retrospective approach suggested in the comment letters, because refining such existing modifications would be likely to add complexity to the transition requirements and could disrupt implementation;
- specifying a particular transition requirement that an entity may use estimates, because it could risk incorrectly implying that estimates are not permitted or required to apply other requirements in IFRS 17 or other IFRS standards; and
- specifying methods that could be used to apply the transition requirements, for example using information gathered in the past for other purposes, because it would risk incorrectly implying that other methods cannot be used or that a specified method is always appropriate. The appropriateness of any method depends on the individual facts and circumstances.

PwC Observation:

While the Board has previously indicated that it would be willing to consider specific transition reliefs, it also believes that any such reliefs would need to ease implementation without significantly reducing the usefulness of information for users of financial statements. While comment letters did suggest further modifications, many did not meet the Board's criteria for amending IFRS 17.

Some respondents to the ED had suggested that the Board include in the standard the explanation in the Basis for Conclusions on the ED that the Board expects entities to use estimates when applying IFRS 17 retrospectively. One Board member, while agreeing with the staff recommendation that such statements should not be included in the standard, encouraged the staff to ensure that the explanation was retained in the Basis for Conclusions to the final amendments. Similarly, he thought that it would be useful to include in the Basis for Conclusions that in applying the IFRS 17 transition requirements, an entity may need to make use of information the entity gathered in the past for other purposes, for example, for regulatory reporting purposes.

Minor amendments and other topics raised by respondents to the ED

21. The Board considered the minor amendments proposed in the ED and an analysis of the new concerns and implementation questions raised by respondents that it had decided in November 2019 to consider.

22. The Board finalised the minor amendments proposed in the ED with limited changes, together with a further amendment relating to income tax payments and receipts that was raised by respondents in the response to the ED. In particular, the Board decided to finalise the editorial correction that would specify that, when assessing whether a contract meets the criteria for the scope of the VFA, an entity should assess the variability of the amounts to be paid to the policyholder over the duration of the insurance contract (rather than over the duration of the group of insurance contracts). The Board decided that it would make no other amendments to IFRS 17 in response to the new concerns and implementation questions raised by respondents.

PwC Observation:

Although the minor amendments should be largely uncontroversial and were not discussed by the Board in detail, there are some exceptions:

- The Board's tentative decision to resolve an inconsistency in the treatment of income tax payments and receipts is expected to be welcomed in countries such as South Africa, the UK and Canada, where it is common for insurance contracts to specify income tax payments and receipts that are specifically chargeable to the policyholder.
- The Board tentatively decided to finalise the amendment to paragraph B107 to specify that, when assessing whether a contract meets the criteria for the scope of the VFA, an entity should assess the variability of the amounts to be paid to the policyholder over the duration of the insurance contract (rather than over the duration of the *group* of insurance contracts). The Board regarded this amendment to be an editorial correction; in contrast, some respondents viewed it as a major change to the requirements in IFRS 17. The feedback the Board has received on this issue indicates the differences in interpretation of this requirement that emphasises the need for this amendment. One Board member however acknowledged that clarifying paragraph B107 could significantly increase implementation costs for some entities and this would be a relevant factor to consider when re-deliberating the proposed effective date. Another board member suggested that the staff should consider providing some educational material on this topic.
- The Board tentatively decided that it would not amend IFRS 17 in response to concerns raised by respondents that the proposed requirement to present all changes in underlying items as insurance finance income or expenses would destroy the presentation of the different sources of profit from insurance contracts. The Board noted that it was an important principle in IFRS standards that the underlying contracts are accounted for consistently according to their nature, and the participating contracts are accounted for consistent with the fact that they operate in a manner similar to investment-related service contracts.
- The Board also tentatively decided it would not amend IFRS 17 in response concerns raised by some respondents regarding perceived accounting mismatches when the VFA is applied to some contracts that change in nature over time, for example when the policyholder exercises an option in the contract. An example of such a contract is one with a savings phase with profit sharing that provides the policyholder with an option to subsequently convert the account balance into an annuity at a guaranteed rate. When the VFA is applied after the option is exercised, similarly to other contracts that have significant fixed cash flows, the changes in estimates adjust the CSM while the changes in the assets held to back these contracts are recognised in profit or loss or OCI. The Board noted that different respondents favoured different suggested ways of amending IFRS 17 and that, further, those ways touched on aspects of IFRS 17 that would be difficult to amend without undermining fundamental features of IFRS 17.

Next steps

23. The staff is expected to present papers to the Board in March 2020 on the effective date of IFRS 17 and the extension of the IFRS 9 temporary exemption in IFRS 4. The staff is expected to request the Board's permission to start the balloting process for finalising the amendments to IFRS 17 in March. The Board confirmed that it expects to issue the final amendments to IFRS 17 in mid-2020.

PwC Observation:

We expect that the decision about the effective date will be difficult for the IASB, given the need to balance the different views of stakeholders on this topic and the question of whether the temporary exemption from applying IFRS 9 should also be extended. The discussion of the effective date should also be expected to consider the package of amendments to IFRS 17 that the IASB has now tentatively made. As noted in the discussion of the minor amendments, some Board members may also consider the feedback on topics for which the IASB did not revise its views in evaluating the effective date.

Summary of amendments to IFRS 17

25. The following table summarises the amendments to IFRS 17 tentatively decided by the Board:

Topic
Question 1: Scope exclusions
● Addition of scope exclusions for loans and credit cards, as proposed in the ED. ● Addition of a scope exclusion for insurance contracts that provide credit or payment arrangements that are similar to credit card contracts that meet the definition of an insurance contract if and only if the entity does not reflect an assessment of the insurance risk associated with an individual customer in setting the price of the contract with that customer.
Question 2: Expected recovery of insurance acquisition cash flows
● Requirement, as proposed in the ED, to allocate insurance acquisition cash flows directly attributable to a group of insurance contracts applying a systematic and rational method: ○ to that group; and ○ to any groups that include contracts that are expected to arise from renewals of the contracts in that group. ● Requirement to assess the recoverability of an asset for insurance acquisition cash flows if facts and circumstances indicate that the asset may be impaired, as proposed in the ED. ● Related disclosures, as proposed in the ED.
Question 3: Contractual service margin attributable to investment services
● Requirement for an entity to identify coverage units for insurance contracts with direct participation features considering the quantity of benefits and expected period of both insurance coverage and investment-related service, as proposed in the ED. ● Requirement for an entity to identify coverage units for insurance contracts without direct participation features considering the quantity of benefits and expected period of investment-return service, if any, in addition to insurance coverage, as proposed in the ED. ● Requirement for an entity to include, as cash flows within the boundary of an insurance contract, costs related to investment activities to the extent the entity performs such activities to enhance benefits from insurance coverage for the policyholder, even if the entity has concluded that the contract does not provide an investment-return service. ● Related disclosures, as proposed in the ED.

Question 4: Reinsurance contracts held - recovery of losses

• Requirement for an entity to adjust the contractual service margin of a group of reinsurance contracts held, and as a result recognise income, when the entity recognises a loss on initial recognition of an onerous group of underlying insurance contracts, or on addition of onerous contracts to that group. This requirement would apply only when the reinsurance contract held is recognised before or at the same time as the loss is recognised on the underlying insurance contracts
• Requirement to determine the amount of a loss recovered from a reinsurance contract held by multiplying:
  ○ the loss recognised on underlying insurance contracts; and
  ○ the percentage of claims on underlying insurance contracts that the entity expects to recover from the reinsurance contract held.

Question 5: Presentation in statement of financial position
• Presentation in the statement of financial position - by portfolio instead of group level, as proposed in the ED.
Question 6: Applicability of the risk mitigation option
• Applicability of the risk mitigation option - for reinsurance contracts held, as proposed in the ED. • Extension of the applicability of the risk mitigation option to non-derivative financial instruments at fair value through profit or loss when the entity mitigates the effect of financial risk on the fulfilment cash flows set out in paragraph B113(b) of IFRS 17 using non-derivative financial instruments measured at fair value through profit or loss, provided that the conditions in paragraph B116 of IFRS 17 are met.
Question 7: Effective date
To be considered in March 2020.
Question 8: Transition reliefs

• Transition relief for insurance contracts acquired in a business combination before transition to IFRS 17 by permitting a liability for settlement of claims incurred before an insurance contract was acquired to be classified as a liability for incurred claims, as proposed in the ED.
• Transition reliefs for the risk mitigation option, as proposed in the ED relating to the application from the transition date and the option to apply the fair value approach.
• Transition modifications and reliefs related to insurance acquisition cash flows.
• Additional specific transition modifications and reliefs that:
  ○ extend the modification in the modified retrospective approach and relief in the fair value approach relating to assessments that would have been made at inception or initial recognition of whether an investment contract meets the definition of an investment contract with discretionary participation features;
  ○ amend the proposed modification in the modified retrospective approach for reinsurance contracts held when underlying insurance contracts are onerous; and
  ○ add a modification to the modified retrospective approach for entities that make an accounting policy choice not to change the treatment of accounting estimates made in previous interim financial statements.

Question 9: Minor amendments
The minor amendments proposed in the ED, with limited modifications.
Topics not proposed in the ED
• Amendment to paragraph B137 of IFRS 17 to require an entity to make an accounting policy choice as to whether to change the treatment of accounting estimates made in previous interim financial statements when applying IFRS 17 in subsequent interim financial statements or in the annual reporting period. • Amendment to paragraph B66(f) of IFRS 17 to resolve an inconsistency between that paragraph and paragraph B65(m) of IFRS 17. After that amendment, an entity would apply paragraph B65(m) of IFRS 17 to include in the fulfilment cash flows the income tax payments and receipts that are specifically chargeable to the policyholder under the terms of an insurance contract.

Find out more in PwC's publications and resources related to IFRS 17:	**Authored by:**
• In transition INT 2020-01 • In transition INT 2019-09 • In transition INT 2019-08 • In transition INT 2019-07 • In brief INT 2019-09 *Proposed amendments to IFRS 17, 'Insurance contracts'* • Illustrative IFRS consolidated financial statements 2019 - Insurance PwC clients who have questions about this In transition should contact their engagement partner.	**Gail Tucker** Partner +44 (0) 7712 489634 gail.l.tucker@pwc.com **Donald Doran** Partner +1 (908) 581 0874 donald.a.doran@pwc.com **Andrea Pryde** Director +44 (0) 7903 861630 andrea.pryde@pwc.com **Gerda Burger** Senior Manager +44 (0) 7483 329968 gerda.b.burger@pwc.com

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