A.M. Best Asia-Pacific (Singapore) Pte. Ltd. (AMBAPS) is established in Singapore and is a holder of a Capital Markets Services Licence to provide Credit Rating Services. Licensing was completed in accordance with the Securities and Futures Act (Chapter 289) and it is supervised by the Monetary Authority of Singapore.

This report is published in accordance with the requirements of Section D of the Code of Conduct for Credit Rating Agencies (“the MAS Code”) which was published by the Monetary Authority of Singapore (“MAS”).
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1. Introduction

A.M. Best has been producing credit ratings and opinions on the insurance market for over 100 years. In recent years, A.M. Best has expanded its geographical coverage from its principal market in the United States to cover the Americas, Europe, Middle East, Africa, India and the Asia-Pacific region. As at 30th September 2018, A.M. Best had credit rating operations based in Oldwick (New Jersey), London, Hong Kong, Singapore and Mexico City.

A.M. Best currently has regulatory registrations in:

- The USA (A.M. Best Rating Services, Inc. – “AMBRS”)
- Brazil (AMBRS)
- The European Union (A.M. Best Europe - Rating Services Limited – “AMBERS”)
- Dubai (AMBERS) - Representative Office only
- Hong Kong (A.M. Best Asia-Pacific Limited – “AMBAP”)
- New Zealand (AMBAP)
- Australia (AMBAP)
- China (AMBAP)
- Singapore (A.M. Best Asia-Pacific (Singapore) Pte. Limited – “AMBAPS”)
- Mexico (A.M. Best América Latina, S.A. de C.V – “AMBAL”)

A.M. Best is renowned for its experience and knowledge of the insurance sector and currently provides ratings to circa 3,500 entities across the sector.

The credit ratings issued by A.M. Best are independent opinions regarding the creditworthiness of an obligor, issuer or a debt obligation; the ratings are based on a quantitative and qualitative evaluation of a company's balance sheet strength, operating performance and business profile, or, where appropriate, the specific nature and details of a debt security. In common with most other rating agencies, A.M. Best operates on an issuer pays model which allows the public to gain free access to the published rating opinions.

The credit rating opinions are forward-looking rather than a backwards verification of the facts. Best’s credit ratings are assigned using a number of simple, straight-forward scales, with each scale representing a rank ordering of our opinion of the relative creditworthiness of an insurer, issuer or financial obligator. For example, insurers that are assigned higher credit ratings are deemed to be less likely, in our opinion, to become financially impaired than insurers that are assigned lower credit ratings. While ratings reflect our opinions of relative creditworthiness at the time they are assigned, they are not indicators or predictors of defined impairment or default probabilities with respect to any specific insurer, issuer or financial obligation. The ratings themselves are opinions of relative credit risk. Therefore, users of ratings should consider the rating assigned to an entity alongside other information in order to reach an informed opinion.

AMBAPS currently assigns two types of ratings:

- Financial Strength Ratings (FSRs) – These are an independent opinion of an insurer’s financial strength and ability to meet its ongoing insurance obligations. This type of rating is assigned to insurance companies.
- Issuer Credit Ratings (ICRs) – These are an independent opinion of an entity's ability to meet its ongoing financial obligations. This rating is assigned to the insurance companies and their related holding companies as well as other legal entities authorised...
to issue financial obligations. This rating can be issued on either a long- or short-term basis.

N.B. AMBAPS also has the ability to assign Issue Credit Ratings (IR) – These are ratings assigned to traditional forms of debt, preferred stock or trust preferred securities that are issued by insurance companies and insurance holding companies. There are currently no IRs assigned by AMBAPS.

The current version of Understanding Best’s Credit Ratings (“UBCR”) which includes the definitions of the above types of ratings can be found in Section VIII within the attached link:


A.M. Best’s credit ratings are not a warranty, nor are they a recommendation to buy, sell, hold or trade any securities or insurance related products. They do not address the suitability of any particular financial obligation for specific purposes or for potential purchasers.
2. Code of Conduct


A.M. Best has adopted a single Group-wide Code of Conduct (“the AMBRS Code of Conduct”), which encompasses the provisions of the IOSCO Code. The Code sets forth fundamental business practices that should be followed by A.M. Best and its employees globally. The AMBRS Code of Conduct is publicly disclosed on A.M. Best’s website via the attached link:


The AMBRS Code of Conduct should be read in conjunction with its Global Policies and Procedures which, when taken together, implement the requirements of the MAS Code.

The AMBRS Code of Conduct is viewed as the high level standards and principles against which the company operates. A.M Best also has a range of other policies and procedures which provide detailed interpretations of the laws, rules and regulations which govern the ways in which the business operates.

A summary of the policies and procedures used to determine credit ratings can be found at exhibit 2 within the attached link:

http://www.ambest.com/nrsro/FormNRSRO_Annual_Certification_March_Exhibit1-9.pdf

More information on rating methodology / criteria for the types of ratings issued by A.M. Best is available on our web site at:

http://www.ambest.com/ratings/methodology.asp

On October 13, 2017, A.M. Best published an updated version of the Best’s Credit Rating Methodology (“BCRM”), along with a number of other BCRM-related criteria. These updates are designed to further increase transparency in Credit Rating (rating) analysis.

The updated BCRM is a reorganization of the previous methodology, utilizing a building block approach to provide greater detail and clarity to the rating analysis. The BCRM offers a forum for discussion with analytical staff and also will provide greater clarity in the rating process. While the methodology has been updated, the core components of the analytical process—balance sheet strength, operating performance, business profile and enterprise risk management—remain the key pillars of the analysis and thus do not represent a fundamental change to the rating analysis. In addition to reflecting the building block approach, some of the revised criteria procedures are amalgamations of previously in-use criteria procedures. Those that relate to the rating of specialty insurers emphasize what is unique or different between the analysis of the specialty insurer and the analytical process as outlined in the updated BCRM.

Some of the most significant areas of refinement are highlighted as follows:

- Reorganization of the methodology and criteria procedures to highlight the building block approach to the rating process;
- Incorporation of the redesigned BCAR models; and
- Expansion of the discussion of available capital and equity credit.
Employees continue to be provided with training and testing on compliance and ratings policies including the management of conflicts of interest. All policies are made available to employees through A.M. Best’s intranet pages and training is provided regarding new or amended requirements.
3. Legal Structure and Ownership

3.1 Legal Structure
A.M. Best Asia-Pacific (Singapore) Pte. Ltd. ("AMBAPS") is incorporated in Singapore and is a holder of a Capital Markets Services Licence to provide Credit Rating Services. Licensing was completed in accordance with the Securities and Futures Act (Chapter 289) and it is supervised by the Monetary Authority of Singapore.

<table>
<thead>
<tr>
<th>Class of Shares:</th>
<th>Ordinary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Currency:</td>
<td>Singapore Dollars (S$)</td>
</tr>
<tr>
<td>Amount of issued Share Capital:</td>
<td>1,300,000</td>
</tr>
<tr>
<td>Amount of Paid-Up Share Capital:</td>
<td>1,300,000</td>
</tr>
</tbody>
</table>

3.2 Ownership
AMBAPS is a wholly owned subsidiary of A.M. Best Asia-Pacific Limited ("AMBAP"), a company incorporated in Hong Kong and regulated by the Hong Kong Securities and Futures Commission. AMBAP is, in turn, a subsidiary of A.M. Best Rating Services Inc. ("AMBRS") a company incorporated in Delaware, USA and with its Head Office in New Jersey, USA. AMBRS is registered with the U.S. Securities and Exchange Commission. AMBRS is a wholly owned subsidiary of A.M. Best Company, Inc., which is a privately owned company incorporated in New Jersey, USA.

<table>
<thead>
<tr>
<th>Name &amp; Address of Shareholder</th>
<th>Percentage Shareholding</th>
<th>No. and class of shares held</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.M. Best Asia-Pacific Ltd (AMBAP)</td>
<td>100%</td>
<td>1,300,000</td>
</tr>
<tr>
<td>Unit 4004 Central plaza</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18 Harbour Road</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wanchai</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hong Kong</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3.3 Board of Directors
The AMBAPS Board consists solely of Executive Directors and is chaired by an Executive Board Director of AMBRS. The membership of the Board also includes the CEO of AMBAPS. As at 30th September 2018, the Directors are:

- Chairman, Mr Larry Mayewski;
- Director and CEO of AMBAPS, Dr Roger Sellek;
- Director, Mr Bernard Peecock;
- Director, Ms Suzanne Pool; and
- Director, Mr Jose Ribeiro.

The Board of Directors currently meets on an approximately quarterly basis, although ad hoc meetings are scheduled as required.
4. Financial Information on Revenue and Compensation Disclosures

A.M. Best’s credit rating businesses (including AMBAPS) operate using the “issuer pays” model which means that it receives credit rating service fees from the organisations / issuers that it rates and, in certain instances, receives such fees from organisations / issuers that do not result in the issuance of a publicly disclosed A.M. Best credit rating. A.M. Best may offer non-rating related services or products to rated entities and receive compensation from them. The wider A.M. Best Group does provide a range of insurance products and reports to the insurance sector. However, these revenue streams do not form part of the accounting figures for AMBAPS.

In accordance with paragraphs 6.3 to 6.5 of the MAS Code, a CRA should publicly disclose the general nature of its compensation arrangements with rated entities, including annual revenue from a single issuer and its affiliates that constitutes more than 5% of its annual income. The total remuneration from one organization, ACR Capital Holdings Pte. Ltd., exceeded the 5% of total annual revenue disclosure threshold for the year ended 31 December 2017. No other single issuer or organisation’s remuneration was over 5% of AMBAPS’ total annual revenue for the year ended 31 December 2017.

Within AMBAPS’ parent company, AMBAP, the total remuneration from four organization, China Investment Corporation, Fosun International Holding Ltd, China Taiping Insurance Group Ltd and MS&AD Insurance Group Holdings Inc exceeded the 5% of total annual revenue disclosure threshold for the year ended 31 December 2017.
5. **Internal Control Mechanisms Ensuring Quality of Credit Rating Activities**

A.M. Best strives to ensure that credit ratings are free from conflicts of interest, are consistent and are not subject to geographical variations. AMBAPS is a separate legal entity based in Singapore and subject to credit rating agency legislation and regulation in that jurisdiction. However, as part of A.M. Best, it shares common methodologies and processes of the Group.

At a high level, AMBAPS’ internal control mechanisms ensure the quality of its credit rating activities and can be grouped into six broad headings:

- Ownership and Management Structure
- Code of Conduct and Policies and Procedures
- The Credit Rating Process
- The Management of Conflicts of Interest
- Performance of Credit Ratings
- Internal Control Functions and Frameworks

5.1 **Ownership and Management Structure**

The Directors of AMBAPS have a combination of extensive experience in the insurance industry supplemented with credit rating specific experience gained within A.M. Best. Moreover, as a privately owned company, A.M. Best is free from potential conflicts of interest and influence from external shareholders.

5.2 **Code of Conduct and Policies and Procedures**

Please also see Section 2 of this report.

A.M. Best has implemented and maintains its policies, procedures and guidelines on a global basis to reflect the global nature of the credit rating business. A.M. Best believes that the users of credit ratings are best served when there is a single recognisable standard that provides direct comparisons which have a single interpretation and meaning that are not subject to national or regional variations.

All of the policies, procedures and guidelines are designed to be consistent with the AMBRS Code of Conduct that takes into account applicable credit rating agency regulations.

Policies and procedures are created through a systematic process which involves several key stages; the interested parties to the proposed policies and procedures contribute their specific technical expertise to the drafting process to ensure that the key elements of the policies and procedures have been included.

It is the responsibility of the Corporate Rating Policy Committee (“CRPC”) to manage the drafting of the policies and procedures, and to publish the resultant drafts within A.M. Best, to allow employees the opportunity to comment.

The key stages for the implementation of a new policy or procedure may be summarised as follows:

- Analysis of the regulatory requirements or business needs for the policy or procedure;
- Gathering of technical expertise and key elements to be contained in the policy or procedure;
- Drafting of the policy by the CRPC;
• Presentation of policy or procedure to rating division management;
• General release of draft for further comment by employees; and
• Publication of the policy or procedure.

All policies and procedures are subject to regular review. This review process is managed by the CRPC. The CRPC reports on its activities and findings to the Executive Vice President, Global Rating Products and Services, and submits regular reports to the Directors of each of the individual legal entities within A.M. Best.

5.3 The Credit Rating Process

The foundation of the interactive credit rating process is an ongoing dialogue with the rated company’s management, which is facilitated by A.M. Best’s credit analysts. Each interactively rated entity is assigned to a lead analyst who is supervised by a team leader. The lead analyst is charged with managing the ongoing relationship with company management and performing the fundamental credit analysis prescribed in A.M. Best’s rating criteria. It is the lead analyst’s responsibility to monitor the financial and non-financial results and significant developments for each rated entity in his/her portfolio. A rating evaluation can be considered whenever A.M. Best becomes aware of a significant development, regardless of the annual review cycle.

This ongoing monitoring and dialogue with management occurs through formal annual rating meetings, as well as interim discussions on key trends and emerging issues as needed. Management meetings afford analysts the opportunity to review with the company factors that may affect its rating, including strategic goals, financial objectives and management practices. It is during these interactive meetings that a company typically will share information that may be extremely sensitive or proprietary in nature.

The dialogue with management continues throughout the rating process which is described in more detail below.

1. Compile Information. The rating assessment begins with the compilation of detailed public and proprietary financial information, including annual and quarterly financial statements, regulatory filings, certified actuarial and loss-reserve reports, investment detail and guidelines, reinsurance transactions, annual business plans and Best’s Supplemental Rating Questionnaire. The primary credit analyst uses this information to develop a tailored agenda for the annual rating meeting. The annual meeting is a key source of quantitative and qualitative information.

2. Perform Analysis. A.M. Best’s analytical process incorporates a host of quantitative and qualitative measures that evaluate various sources of risk to an organisation’s financial health, including underwriting, credit, interest rate, country and market risks, as well as economic and regulatory factors. The analysis includes comparisons with peers, industry standards and proprietary benchmarks, as well as assessments of operating plans, philosophy, management, risk appetite, and the implicit or explicit support of a parent or affiliate.

3. Determine Best’s Rating. An initial rating recommendation is developed based on the analytical process outlined above. Each rating recommendation is reviewed and modified, as appropriate through a rigorous committee process that involves analysts and senior rating officers who possess relevant expertise.
This committee approach ensures consistency of ratings across different business segments and maintains the integrity of the rating process and methodology. The final rating outcome is determined by one or more rating committees after a detailed discussion of the pertinent rating issues and financial data.

Before public dissemination, the rating outcome is communicated to the company to which it is being assigned. If the company disagrees with the rating and believes that the information on which it was based was incomplete or misunderstood, then the rating can be appealed. If material new information is forthcoming in a timely manner, then the rating committee may reconsider the rating.

4. Disseminate Best’s Rating. Best’s Credit Ratings are disseminated as soon as practicable once the rating process is finalised. The ratings are made available to the public via A.M. Best’s website and through a number of different data providers and news vendors.

5. Monitor Best’s Rating. Once an interactive credit rating is published, A.M. Best monitors and updates the rating by regularly analysing the company’s creditworthiness. Analysts continually monitor current developments (e.g., financial statements, public documents, news events) to evaluate the potential impact on a company’s rating. Significant developments can result in an interim rating evaluation, as well as modification of the rating or outlook. The primary analyst typically will initiate an evaluation of the rating upon becoming aware of any information that might reasonably be expected to result in a rating action.

5.4 The Management of Conflicts of Interest

AMBAPS has initiated a number of processes to manage potential conflicts of interest. These include:

- The adoption of the AMBRS Code of Conduct based on the IOSCO principles. The AMBRS Code of Conduct is regularly updated to keep it current and address evolving risks.

- The adoption of policies and procedures which address and manage conflicts of interest. Every quarter, employees affirm that they are aware of the details contained within the AMBRS Code of Conduct and that they follow the policies and procedures, particularly with respect to gifts and entertainment, securities trading and ownership and other situations that could cause a real or potential conflict of interest.

- The business model operated by A.M. Best separates the commercial aspects of providing a rating from the analytical process. The AMBRS Code of Conduct expressly prohibits analytical employees from any knowledge of the commercial terms between the company and a rated entity.

- The rating process ensures that any potential conflicts of interest are declared at the outset of the ratings determination and analysts declare whether or not they have any potential conflicts of interest before joining any rating committee.

- The rating decision reached is that of a committee rather than the judgment of any single individual.

- When an analyst leaves the employ of A.M. Best to work for a rated entity, a look-back review is conducted to make sure that the analyst did not exert any undue influence on the decision of the rating committee of that entity.
• The compensation for analysts does not contain any element for the retention or acquisition of business.

The Compliance Officer actively monitors the potential and actual conflicts of interest that may occur within the business and reports any findings to the AMBAPS’ Board.

5.5 Performance of Credit Ratings

A.M. Best provides annual performance measurement statistics associated with Financial Strength Ratings, Issuer Credit Ratings, and Debt Ratings. The impairment database upon which the performance measurement statistics are based covers ratings associated with individual US and non-US operating insurance companies with public and private FSRs. Consequently, AMBAPS believes the results are applicable to its rated population given the consistent global application of rating criteria. The applicable periods for the performance statistics are the most recent 1-year, 3-year and 10-year periods all ending on 31st December in the prior calendar year.

Performance measurement statistics are updated annually at the end of the first quarter and these are made available on A.M Best’s website. These performance measurement statistics display the following ratings transition data for the various rating types:

a) 1-year ratings transition matrix and 1-year impairment/default rate for each rating level;

b) 3-year ratings transition matrix and 3-year impairment/default rate for each rating level; and

c) 10-year ratings transition matrix and 10-year impairment/default rate for each rating level.

The most recently available performance measurement statistics can be found in Exhibit 1 within the attached link:

www.ambest.com/nrsro/FormNRSRO_Exhibit1-9.pdf

For the purpose of tabulating impairment rates for insurers, A.M Best designates an insurer as a Financially Impaired Company (“FIC”) upon the first official regulatory action taken by an insurance department or regulatory organisation, whereby the insurer’s:

• ability to conduct normal insurance operations is adversely affected; and/or

• capital and surplus have been deemed inadequate to meet legal requirements; and/or

• general financial condition has triggered regulatory concern.

The definition of financial impairment is different from that of issuer default that is generally used in the credit markets. (Issuer default is generally defined as having occurred when an issuer misses interest or principal payments on its obligations; restructures its debt in a way that is deleterious to investors; or files for bankruptcy.)

Financial impairment of insurance companies, by contrast, often occurs even if an insurance company has not formally been declared insolvent. For instance, a FIC’s capital and surplus could have been deemed inadequate to meet risk-based capital requirements, or there might have been regulatory concerns regarding its general financial condition. Thus more insurers would be impaired, according to the above definition, than actually would default in full (or in part) on policyholder obligations.
5.6 Internal Control Functions and Frameworks

Cross Jurisdictional Management Support Functions
In the interests of consistency, A.M Best looks to utilise centralised functions wherever it is most appropriate to do so. The function responsible for the production of methodologies and models is centralised in A.M Best’s Head Office in Oldwick, New Jersey.

Credit Rating Policy Committee
The Credit Rating Policy Committee (“CRPC”) is the global function which is responsible for facilitating the establishment, maintenance and appropriateness of A.M Best’s global credit rating criteria, models and methodologies as well as all A.M. Best’s credit rating policies and procedures. When established in January 2009, CRPC was the “approving” body responsible for Best’s Credit Rating Methodology (“BCRM”) and the policy and procedures pertaining to the production of Best’s Credit Ratings (“BCR”). Effective 15 June 2015, in recognition of changes in regulatory requirements in the US, the AMBRS Board of Directors (“AMBRS Board”) assumed responsibility for the formal approval of the BCRM for global use. To support the AMBRS Board in meeting this new responsibility, the Methodology Advisory Committee (“MAC”) was established. The MAC, which includes the independent directors of AMBRS (US) and AMBERS (UK), has oversight of the activities of CRPC related to the development of credit rating methodology. CRPC’s primary responsibilities now are to:

- oversee and document the methodology development and review process;
- maintain and demonstrate appropriate documentation and internal controls relevant to the methodology development process;
- support the MAC and respective boards in their roles related to the oversight and approval of methodology; and
- facilitate the public review and dissemination of BCRM and our insurance criteria procedures, including posting of related regulatory disclosures.

The CRPC continues to serve as A.M. Best’s independent internal review function globally for the review and update of BCRM, including any new criteria/model development, as well as policy and procedure maintenance, and development as required by law or implemented for internal business purposes. The CRPC is independent of the business lines that are responsible for the determination of credit ratings; however, members of the CRPC possess appropriate expertise in the credit rating process (and/or related disciplines) as to be able to provide sufficient knowledge to execute the duties of the committee.

Whilst A.M Best operates in multiple jurisdictions that follow separate regulatory regimes, our basic approach in developing credit rating criteria and policy is to establish, where possible, consistent global methods, tools and business rules that can be consistently applied to all organisations rated by A.M Best. A.M Best’s senior management strongly believes that a consistent global approach is paramount to the integrity of the credit rating process, and is consistent with the underlying regulatory principles of transparency and objectivity.

The CRPC is responsible for ensuring that credit rating criteria and policy are developed, elaborated and reviewed so that they take into account all information available and relevant to its analysis, and are updated as necessary and reviewed regularly by employees who possess the relevant industry knowledge, quantitative and qualitative skills, and experience. The regular reviews of criteria and policy consider a broad range of factors, including but not limited to:
• the presence of relevant new data that were not considered in the development of the existing criteria or policy;
• changes in any underlying assumptions (if any) built into the criteria or policy;
• the impact of any market events and macroeconomic trends; and
• insights and/or comments stemming from rating surveillance or monitoring of rated entities and/or financial instruments.

The CRPC meets regularly with members of senior rating division management to coordinate criteria and policy development and review process, and to discuss the implementation of criteria and policy changes, including the need for training and other forms of analytical guidance. This regular interaction allows for feedback from the analytical teams to be considered, where appropriate, throughout the process. Topics typically addressed include, but are not limited to:

• issues arising from the ongoing monitoring and surveillance of ratings that may impact the development and review of criteria and policy;
• assessing the impact on existing criteria and analytical processes of changes in regulatory requirements;
• findings and other feedback from the criteria and policy review process;
• assessing the likely scope of credit ratings affected by changes in criteria and methodology; and
• setting and monitoring priorities and resource requirements based on the various CRPC initiatives underway.

The Chair of the CRPC provides regular reports to the AMBAPS' Board of Directors on the internal review activities, issues and findings and, on an annual basis, will prepare and present a global report to the Board of Directors of the subsidiary companies.

Group Risk Management Advisory Committee
The Group is constantly enhancing its risk infrastructure. The Risk Management Advisory Committee ("RMACo") was established as a global forum which provides independent review and oversight of our various risk management efforts. The RMACo, which includes representation from the independent members of the AMBRS and AMBERS boards, advises the respective boards on risk exposures and makes recommendations on relevant tactical and strategic initiatives.

Audit and Risk Management Committee
The Audit and Risk Management Committee ("ARMCo") operates within AMBAPS' risk tolerance framework which is determined by the AMBAPS' Board, subject to the AMBRS' risk tolerance. The ARMCo includes representation from the AMBAPS' Board including the CEO (who will perform the role of Chairman), Directors, as well as the Compliance Officer and the Accounting Manager. The Senior Director, Regulatory Research and Risk Analysis and a representative from internal audit may be invited to attend relevant ARMCo meetings.

The purpose of ARMCo is to assist the AMBAPS' Board in its oversight of:

• the integrity of the Company’s statutory financial statements;
• the Company’s independent auditors’ qualifications and independence;
• the performance of the Company’s independent auditors and the Company’s outsourced internal audit function;
• the Company’s compliance with legal and regulatory requirements;
• the adequacy of the Company’s internal control frameworks;
• the adequacy of the Company’s risk management systems including current risk exposures and risk strategy; and
• the embedding and maintenance of a supportive culture in relation to the management of risk.

ARMCo shall make recommendations to the AMBAPS’ Board on any area within its remit where it is deemed that action or improvement is needed. It is the responsibility of the Chairman of ARMCo to report to the Board on its proceedings after each meeting on all matters within its duties and responsibilities.

**Compliance**

The Compliance function is responsible for assessing A.M. Best’s compliance with the AMBRS Code of Conduct, and policies and procedures on a global basis. The Compliance Officers are responsible for identifying potential and actual conflicts of interest, and assisting the Group in managing and, where possible, eliminating these conflicts.

The Chief Compliance Officer operates from A.M. Best’s Head Office in Oldwick, New Jersey. Compliance for the Asia-Pacific region is handled by the AMBAPS Compliance Officer who is based in the Singapore office and is independent of business management. The AMBAPS Compliance Officer presents regular reports to the AMBAPS’ Management and Board on the efficacy of compliance arrangements in accordance with the Annual Compliance Plan. This includes, but is not limited to, providing updates on:

• compliance monitoring activity;
• any identified compliance issues;
• any regulatory interactions in the reporting period;
• changes to the policies and procedures; and
• progress being made to deliver the Annual Compliance Plan.

A.M Best has a global Whistleblower Policy in place and it is the responsibility of the Compliance Department to investigate any issues raised through this channel.

**Compliance Internal Testing – Rating Division**

A.M. Best’s corporate compliance team located in A.M. Best’s Head Office in Oldwick, New Jersey undertakes an annual programme of testing activity to review compliance with A.M. Best’s credit rating policies and procedures. This testing encompasses rating activities from all A.M. Best offices. In addition, the Asia-Pacific Compliance Officer conducts further tests to provide additional assurance regarding compliance with local regulations.

When completed, the test results are shared with senior management in a report together with recommendations. A summary will also be included within Compliance papers tabled at the AMBAPS Board. Management’s response and action plans to the test results and recommendations are recorded in the final report. Generally, compliance examinations encompass the following objectives:
• test various aspects of the rating review and assignment procedure to ensure accurate and consistent rating treatment;
• test the monitoring of published credit ratings and the public dissemination of such ratings;
• test the file maintenance, document storage, retention and handling of information procedure related to a company’s credit rating operations; and
• test and review aspects of the rating process which may result in a conflict of interest.
6. **Record Keeping Policy**

A.M Best has in place global record keeping policies which have been designed to ensure that A.M Best maintains adequate record keeping requirements which meet not only the Singapore regulations with respect to record keeping, but also the global regulatory standards that are applicable in all the jurisdictions where A.M. Best provides credit rating services.

**Credit Rating Division Record Keeping - Exhibit 3 (CRPC Policy 3)**

**Financial Record Keeping - Exhibit 7 (C-30)**

**Compliance Record Keeping – Exhibit 7 (C-32)**

The Record Keeping Policies can be viewed here:

7. Analyst Rotation

A.M. Best’s procedure for Analyst Rotation was developed to be consistent with applicable regulations in the jurisdictions in which A.M. Best operates. The Analyst Rotation Procedure applies where local regulations require or where the scale of operations within A.M. Best and its subsidiaries can support the rotation of analysts without having a detrimental effect on the quality of service and expertise provided to the rated entities. In the smaller subsidiary offices, including Hong Kong and Singapore, where there are a limited number of analysts and, in some instances, specific language requirements, such a rotation procedure is not applied; however, management does work toward the spirit and intentions of this rotation procedure. For example, while the rotation requirements of A.M. Best’s procedures do not directly apply to AMBAPS owing to the size and scope of its operation, our rating committee structure and quorum requirements provide for a broad-based review and challenge of the credit rating recommendations of the primary analytical teams in AMBAPS.