## ANNEX C

## FEEDBACK TO CONSULTATION PAPER ON THE DRAFT INSURANCE (GROUP CAPITAL) RULES *(Comments should be sent to the Insurance Authority on or before 30 September 2020.)*

**To: Insurance Authority**

(email: comment\_gwsgroupcapitalrules@ia.org.hk)

**Name of Respondent:**

**Contact Person (if Respondent is an organization):**

**Contact Details:**

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| **Question 1**Is the proposed definition of “regulated entity” sufficiently broad to cover all types of regulated entities in an insurance group? |
| **Question 2**Having regard to the intention in paragraphs 29 and 30 in the consultation paper, is there a need to specify the definitions and adjustments that are applicable to “IFRS shareholder equity less goodwill and any other intangible assets” in the Group Capital Rules or guidelines? |

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| **Question 3**Are there other arrangements or holding structures that may require adjustments to be made to eliminate double-counting? |
| **Question 4**Do you agree with the proposed tiering approach for non-regulated entities? |
| **Question 5**Do you agree with the criteria for defining a “material supervised group member” in Rule 10(6) of the Group Capital Rules? |