



Republic of the Philippines
Department of Finance
INSURANCE COMMISSION
1071 United Nations Avenue, Manila



6 March 2025

MARIA SACHIKO PANG
President
SUN LIFE FINANCIAL PLANS, INC.
2nd Floor Sun Life Center
5th Avenue corner Rizal Drive
Bonifacio Global City, Taguig City
leo.carl.chin@sunlife.com
charilyn.chua@sunlife.com

SUBJECT: 2023 Annual Statement (AS) Approval

Dear Ms. Pang:

This refers to the letter dated 22 January 2025 signed by Mr. Leo Carl Chin in response to the Commission's letter dated 7 January 2025 on the Company's 2023 AS Verification and Q1-Q3 2024 Financial Reports Analysis.

We note the Company's response to the directive to cover the trust fund deficiencies of ₱77,039,567.00 for Pension Plan and ₱17,057,654.00 for Education Plan. In response, we wish to remind the Company that the trust fund should at all times be sufficient to cover the pre-need reserves under Section 30 of the Code. Hence, any deficiency in the trust fund determined in the analysis of quarterly financial reports must be funded by the Company to ensure continued compliance. Nonetheless, given that the Q4 2024 financial reports analysis results show that the Company's trust fund complies with regulatory requirements (**Annex A**), the trust fund deficiency based on the Q3 2024 financial reports analysis is deemed covered.

In view of the Company's compliance with the regulatory requirements and directives of the Commission, its 2023 AS is hereby **APPROVED**.

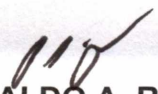
The Company is **DIRECTED** to publish the attached synopsis in two newspapers of general circulation¹ within thirty (30) days from receipt of this letter and furnish the Commission with the pertinent newspaper clippings within five (5) days after publication.

¹ CL No. 2016-34 dated 21 June 2016 Entitled, "Newspaper Publication Requirement."

Meanwhile, we **DENY** your request for reconsideration of the applicable minimum unimpaired paid-up capital requirement, noting that the Company is licensed to offer two (2) product lines (Pension Plan and Education Plan).

Thank you.

Very truly yours,



REYNALDO A. REGALADO
Insurance Commissioner



SUN LIFE FINANCIAL PLANS, INC.
SYNOPSIS OF THE ANNUAL STATEMENT*
As of December 31, 2023

ASSETS		
Investments in Trust Funds	P	3,983,685,208.00 **
Government Securities		217,068,300.00
Cash on Hand and in Banks		80,290,722.42
Mutual Funds/UITF		16,260,536.00
Accrued Investments Income		3,010,088.00
Receivables from Trustee		68,491,504.00
Other Assets		717,253.00
Total Accounted Assets	P	<u>4,369,523,611.42</u>
LIABILITIES		
Pre-need Reserves	P	3,856,982,930.00
Planholders' Benefits Payable		242,081,191.00
Planholders' Deposits		45,124,164.00
Counselors' Bond Reserves		864,251.00
Taxes Payable		2,271,119.56
Accrued Expenses		55,332,110.00
Other Liabilities		2,994,764.00
Total Liabilities	P	<u>4,205,650,529.56</u>
STOCKHOLDERS' EQUITY		
Paid-up Capital Stock	P	125,000,000.00
Additional Paid-in Capital		375,000,000.00
Contingency Surplus		687,000,000.00
Special Surplus Funds:		
Fluctuation/Revaluation Reserve - Trust Funds		183,525,165.00
Fluctuation/Revaluation Reserve - Corporate Assets		(15,700,792.00)
Retained Earnings - Trust Fund		6,968,331,470.00
Retained Earnings - Corporate Assets		(8,159,282,761.14)
Total Stockholders' Equity		<u>163,873,081.86</u>
Total Liabilities & Stockholders' Equity	P	<u>4,369,523,611.42</u>

SUN LIFE FINANCIAL PLANS, INC.
CONSOLIDATED TRUST FUND ANNUAL STATEMENTS
As of December 31, 2023

ASSETS	Pension	Education	Total
Government Securities	P 2,578,665,367.00	P 1,057,740,960.00	P 3,636,406,327.00
Cash in Savings/Time Deposits	18,312,728.00	2,843,689.00	21,156,417.00
Unit Investment Trust Funds (UITF)	3,817,308.00	1,451,682.00	5,268,990.00
Debt Securities	28,655,198.00	54,482,228.00	83,137,426.00
Equity Securities	47,796,704.00	106,045,570.00	153,842,274.00
Other Allowable Investments:			
Other Equity Securities	2,920,200.00	6,025,470.00	8,945,670.00
Real Estate Investments Trust (REIT) & Exchange Traded Funds (ETF)	1,418,818.00	2,841,690.00	4,260,508.00
Accrued Investment Income	42,947,943.00	18,224,461.00	61,172,404.00
Other Assets	4,033,903.00	8,572,156.00	12,606,059.00
Service Assets			
Total Accounted Assets	P <u>2,728,568,169.00</u>	P <u>1,258,227,906.00</u>	P <u>3,986,796,075.00</u>
LIABILITIES			
Trustee Fee Payable	2,133,465.00	976,011.00	P 3,109,476.00
Other Liabilities	434.00	957.00	1,391.00
Total Liabilities	P <u>2,133,899.00</u>	P <u>976,968.00</u>	P <u>3,110,867.00</u>
FUND EQUITY			
Trust Fund Equity	P <u>2,726,434,270.00</u>	P <u>1,257,250,938.00</u>	P <u>3,983,685,208.00</u>

*This synopsis, prepared from the 2023 Annual Statements, approved by the Insurance Commissioner is published pursuant to Section 44 of the Pre-Need Code of the Philippines.

** Trust Fund deficiency subsequently covered up in full.

SUN LIFE FINANCIAL PLANS, INC.
 COMPUTATION OF COMPLIANCES
 For the Quarter Ending December 31, 2024

Annex "A"

A. CAPITAL REQUIREMENT:

A.1 Total Assets	P	3,516,458,128.00	
Total Liabilities		3,329,025,386.00	
Net Worth	P	<u>187,432,742.00</u>	
Required Minimum Unimpaired Paid-up Capital per Section 9 of PNC		75,000,000.00	
Excess/(Impairment) in Minimum Unimpaired Paid-up Capital	P	<u><u>112,432,742.00</u></u>	compliant

A.2

Net Worth	P	187,432,742.00	
Required Minimum Unimpaired Paid-up Capital per CL 2019-50		75,000,000.00	
Excess/(Impairment) in Minimum Unimpaired Paid-up Capital	P	<u><u>112,432,742.00</u></u>	compliant

B. TRUST FUND REQUIREMENT:

		Total	Pension Plan	Education Plan	
Investment in Trust Fund	P	<u>3,200,450,203.00</u>	<u>2,131,472,267.00</u>	<u>1,068,977,936.00</u>	
Less: Due from Trustee		<u>48,651,344.00</u>	<u>20,594,146.00</u>	<u>28,057,198.00</u>	
Actual Trust Fund Balance	P	<u>3,151,798,859.00</u>	<u>2,110,878,121.00</u>	<u>1,040,920,738.00</u>	
Less: Pre-need Reserves		3,025,606,712.00	2,044,552,290.00	981,054,422.00	
Planholders' Benefit Payable		87,659,064.00	47,379,166.00	40,279,898.00	
Sub-total		<u>3,113,265,776.00</u>	<u>2,091,931,456.00</u>	<u>1,021,334,320.00</u>	
Excess/(Deficiency) in Trust Fund	P	<u><u>38,533,083.00</u></u>	<u><u>18,946,665.00</u></u>	<u><u>19,586,418.00</u></u>	compliant

C. INSURANCE PREMIUM FUND REQUIREMENT:

Insurance Premium Fund per company	P	-	
Insurance Premium Reserve per company		-	
Excess(Deficiency)	P	<u><u>-</u></u>	

D. LIQUIDITY RESERVE REQUIREMENT:

		Total	Pension Plan	Education Plan	
1 Trust Fund Equity	P	<u>3,200,450,203.00</u>	<u>2,131,472,267.00</u>	<u>1,068,977,936.00</u>	
Liquidity Reserve Rate - 15%			15%	15%	
Reserve Requirement	P		<u>319,720,840.05</u>	<u>160,346,690.40</u>	
or					
2 Amount of Availing Plans in the following year	P		254,726,178.56	185,288,675.61	
Liquidity Reserve Rate - 125%			125%	125%	
Reserve Requirement	P		<u>318,407,723.20</u>	<u>231,610,844.51</u>	
Higher of (1) or (2)	P		<u><u>319,720,840.05</u></u>	<u><u>231,610,844.51</u></u>	
Qualified Investments:					
Government Securities	P		1,983,559,700.02	910,115,121.78	
Cash in Savings / Time Deposits			27,468,705.06	18,866,585.76	
Total Qualified Investments	P		<u>2,011,028,405.08</u>	<u>928,981,707.54</u>	
Excess in Liquidity Reserve			1,691,307,565.03	697,370,863.03	
Less: Planholders' Benefits Payable			47,379,166.00	40,279,898.00	
Excess in Liquidity Reserve	P		<u><u>1,643,928,399.03</u></u>	<u><u>657,090,965.03</u></u>	compliant