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Dear Sirs

Directors' Remuneration Consultation Document October 2013

On behalf of Partnership Assurance Group plc (the "**Company**"), we confirm that we are not supportive of the three specific proposals to change the UK Corporate Governance Code (the "**Code**") on which comments are sought.

We are fully supportive of the provisions of the Code but feel that the specific proposals are overly complex and unduly prescriptive and there is no evidence that any changes are needed.

Yours faithfully



F E Darby
Group Company Secretary