



**TOKIO MARINE**  
**HCC**

# Tokio Marine HCC Insurance Holdings (International) Limited

Single Group-Wide Solvency and Financial  
Condition Report

31 December 2023

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## Executive Summary

The following Single Group-Wide Solvency and Financial Condition Report (SFCR) has been prepared to provide information to the Prudential Regulatory Authority (PRA) about the financial and capital position of both Tokio Marine HCC Insurance Holdings (International) Limited and its subsidiaries (TMHCCI(H) or the Group), for group reporting purposes, and HCC International Insurance Company plc (HCCII or the Company), for solo reporting purposes. HCCII is the main underwriting entity within the Group during the reporting period. Tokio Marine Europe S.A. (TME), a subsidiary of the Company, is the other underwriting entity included in the Group and information specifically relating to this entity is shown in the TME SFCR. The other related companies in the Group are either ancillary service or holding companies of such size that they do not present material risks to the Group. This report sets out the Business and Performance, System of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management of the Group and Company. A Single Group-Wide SFCR for the European Economic Area (EEA) group headed by TMHCCI(H) is produced in accordance with a waiver granted by the PRA. Given the United Kingdom's (UK) departure from the European Union (EU), this waiver is monitored continually by the Group.

## Business & Performance Summary

TMHCCI(H) is part of Tokio Marine, whose ultimate holding company is Tokio Marine Holdings, Inc. Tokio Marine is a leading international insurance group located in Tokyo, Japan that has 268 subsidiaries and 26 affiliates located worldwide, which undertake non-life and life insurance and operate within the financial and general business sector (including consulting and real estate).

The Group's core business is underwriting Specialty lines of insurance. The Group has three core underwriting segments: International Specialty, London Market, and J Business.

The underwriting segments offer products in the UK from HCCII's London and regional offices; and in the European Union through TME. The Group accepts global inwards reinsurance risks where its licences permit. The majority of the businesses that the International Specialty, London Market and J Business underwrite are commercial lines, although personal lines business is also written within these segments.

The Group's fundamental strategic goal is to produce an underwriting profit and investment income resulting in consistent net earnings that will increase shareholder value. This has been consistently accomplished through diversified businesses led by those who are the best in the business, a comprehensive reinsurance programme and a conservative investment policy. This strategic approach is supported by TMHCC International's culture, which is underpinned by its core values of professionalism, discipline, honesty, respect and trust.

The Group has performed well in 2023 with Gross written premium (GWP) of \$1.8 billion, up 6% (\$102 million). This reflects growth in the underlying portfolio, particularly London Market (up 12.4%) with market conditions more variable in International Specialty (up 1.7%).

A summary of the key financial information for the year ended 31 December 2023 for the Group and the Company is shown below, indicating both have produced sound financial results for 2023, with net combined ratios of 86% and 91% respectively.

	Group	Company
31 December 2023	\$'000	\$'000
Gross written premium	1,783,258	1,252,798
Net premium earned	1,114,950	894,835
Underwriting result (Technical Account pre investment income)	154,442	80,955
Net loss ratio	51%	55%
Net combined ratio	86%	91%
Investment income (Transferred to technical account)	54,535	44,257
Profit / (Loss) on ordinary activities before tax	253,748	174,886
Solvency II Cash and investments (excluding investment in subs and land and buildings)	2,760,543	2,223,495
Solvency II Own Funds	1,308,445	1,300,115

For the financial year 2023, the Group made a net profit before tax of \$254 million (2022: \$10 million loss) of which \$209 million profit (2022: \$255 million) was from the technical account for general business which included investment income of \$55 million

(2022: \$35 million). The investment return contributed significant volatility to the Group’s results compared with the prior year, due to the movement in unrealised gains/losses consistent with market conditions and the US interest rate environment.

The Company made a net profit before tax for the financial year of \$175 million (2022: \$24 million) and includes a balance on the technical account for general business of \$125 million (2022: \$224 million), which included investment income of \$44 million (2022: \$29 million).

Section A includes information on the organisational structure, underwriting performance by Line of Business (LOB) and geographic area and investment performance.

## System of Governance Summary

The Group is directed by the Group Board.

The oversight of the Company’s business and its operations are provided through its governance structure, in which the management of risk plays a significant part. Governance starts with the Company’s Board, which has overall responsibility for management of the Company through providing leadership of the Company within a framework of prudent and effective controls.

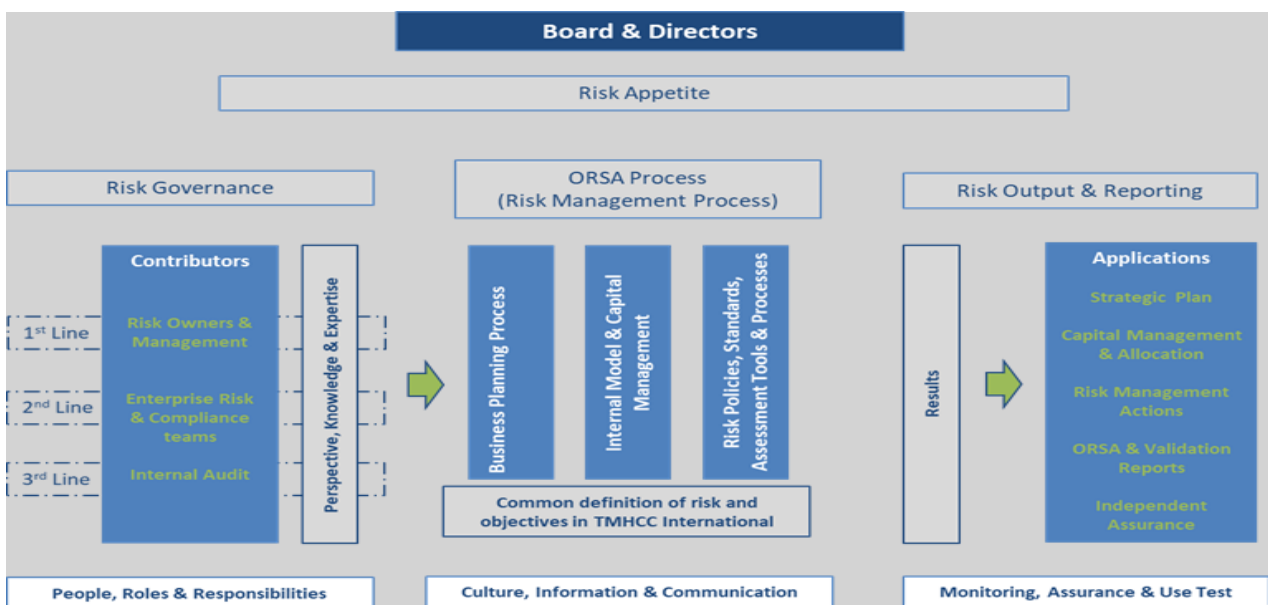
The information contained below relates to the System of Governance for the Company. However, as the Company and its subsidiaries are the only risk-bearing entities of the Group, the risk management, internal control systems and reporting procedures are aligned between both the Company and the Group. The system of governance has not changed materially during the year.

The Group believes that a strong, effective and embedded Enterprise Risk Management (ERM) framework is crucial to maintaining successful business operations and delivering sustainable, long-term profitability. A strong risk culture helps to achieve this, together with rigorous and consistent risk management that is embedded across the Group. This is embodied by management at all levels through its governance structure and risk management practices.

The Board has ultimate responsibility for ensuring the Group has a robust ERM and internal control framework in place, and regularly reviews its principal risks, mitigants and overall risk appetites. Certain risk management activities are delegated to the level that is the most appropriate for overseeing and managing the risks.

The Group’s principal risks, uncertainties and mitigations are set out in Section B. The Board accepts that the Group’s business operations cannot be risk-free; therefore, the ERM framework is designed to manage risk to a desired level and minimise the adverse effects of any residual risk, rather than to entirely eliminate it.

The diagram below illustrates the Group’s ERM framework, demonstrating how risk appetite, risk governance, risk management, risk output and reporting interact with one another.



- Risk Appetite – the level of business risk the Group will take in order to achieve the strategic objectives. The Group has established risk appetite statements, which provide assurance that the Group is able to manage or absorb the impact of a risk in the event it materialises.

- Risk Governance – includes risk policies and procedures; Risk and Capital Management Committees and roles and responsibilities(three lines of defence).
- Risk Management – the processes used to identify, measure, manage, monitor, and report risks (including the internal capital model) and stress and scenario testing, are designed to enable dynamic risk-based decision-making and effective day-to-day risk management.

The Risk, Capital and Compliance Committee leads detailed discussions on principal and emerging risks on behalf of the Board and recommends to the Board the approval of the ERM framework, including risk limits, appetites and tolerances.

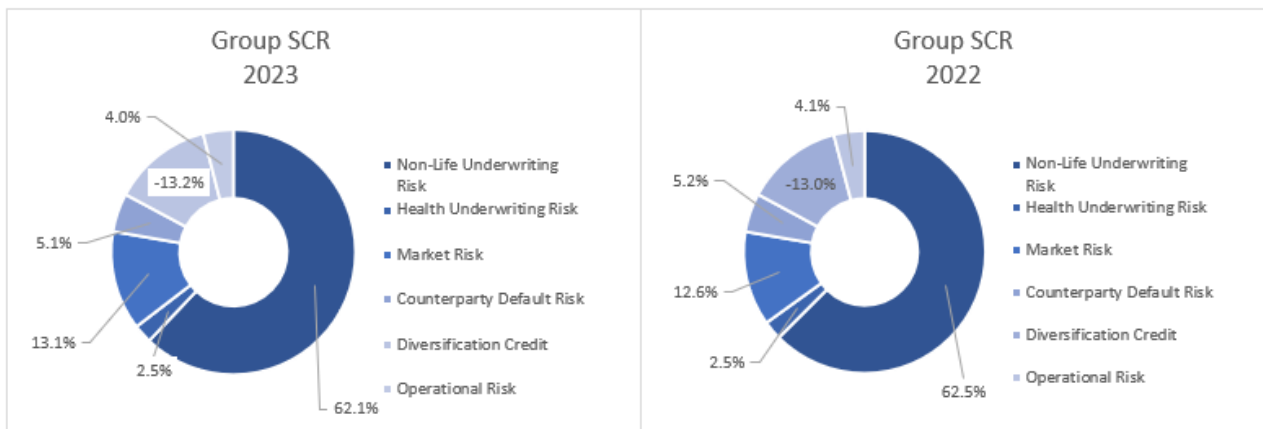
Risks transition from the emerging risk radar to the live risk tracker as they become more likely to impact the Group’s strategic objectives. Risks then transition to the risk register when the risk is near to crystallising and requires formal monitoring and the establishment of a risk control framework.

Section B includes information on system of governance, risk management system and audit and actuarial functions.

### Risk Profile Summary

The Group has identified the risks arising from its activities and has established policies and procedures to manage these risks in accordance with its risk appetite. The Company maintains a risk register and categorises its risks into six areas: Insurance, Strategic, Regulatory and Group, Market, Operational, Credit and Liquidity.

The key risk for both the Group and the Company is Insurance risk; the secondary risk is Market risk. This is illustrated via the Standard Formula Solvency Capital Requirement (SCR) breakdown shown in the charts below, noting that Non-Life Underwriting Risk and Health Underwriting Risk make up Insurance Risk.



The risk profile of both the Group and the Company was generally stable during the reporting period.

Section C includes information on specific risks that have the potential to impact, or require a review of, the existing strategic objectives include strategic risk, regulatory risk, sustainability risk (incorporating climate change), inflation, outsourcing and supplier management and operational resilience.

## Valuation for Solvency Purposes Summary

The Solvency II Directive (Article 75) requires that an economic, market consistent approach to the valuation of assets and liabilities is taken. As a result, certain assets and liabilities require different valuation methods to those used in the statutory financial statements prepared under UK Generally Accepted Accounting Practice (GAAP). Unless otherwise documented, the basis of preparation of the assets and liabilities for solvency purposes is aligned with the basis of preparation of the UK statutory financial statements. This applies to both the Group and Company Solvency II Own Funds valuation. The table below summarises the differences between the Solvency II and UK GAAP balance sheets:

BALANCE SHEET UNDER SOLVENCY II  31 December 2023	Group		Company	
	UK GAAP \$'000	Solvency II \$'000	UK GAAP \$'000	Solvency II \$'000
<b>ASSETS</b>				
Investments	2,656,306	2,690,234	2,622,850	2,501,549
Goodwill	69,004	-	-	-
Intangible assets	37,824	-	-	-
Deferred tax assets	-	-	2,198	-
Deferred acquisition cost	153,194	-	123,599	-
Property, plant & equipment held for own use	7,417	7,417	5,663	5,663
Reinsurance recoverables from Non-life	1,263,322	726,728	653,608	366,076
Insurance and intermediaries receivables	350,460	101,974	194,057	22,239
Reinsurance receivables	297,493	112,391	138,936	-
Receivables (trade, not insurance)	50,104	64,585	107,369	107,369
Cash and cash equivalents	100,071	84,368	49,793	49,793
Any other assets, not elsewhere shown	20,418	493	15,724	-
<b>Total assets</b>	<b>5,005,613</b>	<b>3,788,190</b>	<b>3,913,797</b>	<b>3,052,689</b>
<b>LIABILITIES</b>				
Technical provisions - Non-life	3,156,616	1,935,182	2,268,118	1,433,077
Deferred tax liabilities	7,557	81,889	-	54,656
Insurance & intermediaries payables	43,103	43,103	11,917	11,917
Reinsurance payables	252,832	121,877	131,424	41,508
Payables (trade, not insurance)	2,420	2,420	-	-
Any other liabilities, not elsewhere shown	349,821	295,274	235,762	211,416
<b>Total liabilities</b>	<b>3,812,349</b>	<b>2,479,745</b>	<b>2,647,221</b>	<b>1,752,574</b>
<b>Excess of assets over liabilities</b>	<b>1,193,264</b>	<b>1,308,445</b>	<b>1,266,576</b>	<b>1,300,115</b>

The differences in technical provisions, goodwill and intangible assets are principally driven by differences in valuation methodologies between UK GAAP and Solvency II, while differences in investments and receivables are as a result of classification differences.

Section D includes information on the valuation basis adopted for each class of assets and liabilities and provides a reconciliation of valuation differences arising when moving from the valuation basis used in the Group's financial statements to the Solvency II valuation basis.

## Capital Management Summary

Both the Group and the Company are single shareholder entities. They have no debt financing, nor do they have any material plans to issue new shares in the short or medium term. The capital planning process is dynamic and forward-looking and is informed by the output from its risk management activities and the Own Risk and Solvency Assessment (ORSA) process. The Group and the Company carry a Standard & Poor's Financial Services LLC (S&P) rating of A+ and the Company benefits from a parental guarantee provided by HCC Insurance Holdings, Inc.

To ensure the maintenance of appropriate capital levels at all times, the Group and the Company have defined a specific capital risk appetite with thresholds and limits that trigger actions, including the source of capital and/or associated corrective actions. These appetites have been developed in line with regulatory requirements under the Solvency II regime while also including an appropriate level of prudence over and above minimum levels. These are monitored through the Risk, Capital and Compliance Committee on a regular basis. The Group and Company currently use the Standard Formula to calculate their SCRs.

The position as at 31 December 2023 and 31 December 2022 is shown below:

Eligible Own Funds to cover capital requirements	Group	Group	Company	Company
\$'000	2023	2022	2023	2022
Solvency II Own Funds	1,308,445	1,034,763	1,300,115	1,030,625
SCR	905,806	896,827	738,072	712,683
Minimum consolidated group SCR / Minimum Capital Requirement (MCR) <sup>1</sup>	270,468	245,122	216,962	198,475
Excess Own Funds over SCR	402,639	137,936	562,043	317,942
Excess Own Funds over Minimum consolidated group SCR / MCR <sup>1</sup>	1,037,977	789,641	1,083,153	826,151
Solvency ratio (i.e. Solvency II Own Funds / SCR)	144%	115%	176%	145%
Solvency II Own Funds as a Percentage of minimum consolidated group SCR / MCR <sup>1</sup>	484%	422%	599%	516%

<sup>1</sup>: Minimum consolidated group SCR applies to the Group (and acts as a floor to the group SCR); MCR applies to the Company.

The Group and the Company maintained solvency capital resources in excess of their SCRs. The growth in both the Group's and the Company's Own Funds in 2023 is predominantly due to underwriting profits, unrealised gains and investment income within the year. This increase is partly offset by a marginal increase in the SCR primarily driven by increased Underwriting risk as a result of continued growth in the business. The net impact of the above has led to an increase in the solvency ratio for the Group to 144% (2022: 115%), and for the Company to 176% (2022: 145%).

All the Eligible Own Funds shown in the table above, for both the Group and the Company, fall under the 'Tier 1 unrestricted' classification. There was no non-compliance with the SCR for the Group or the Company during the last reporting period, or any non-compliance with the minimum consolidated group SCR or Company MCR.

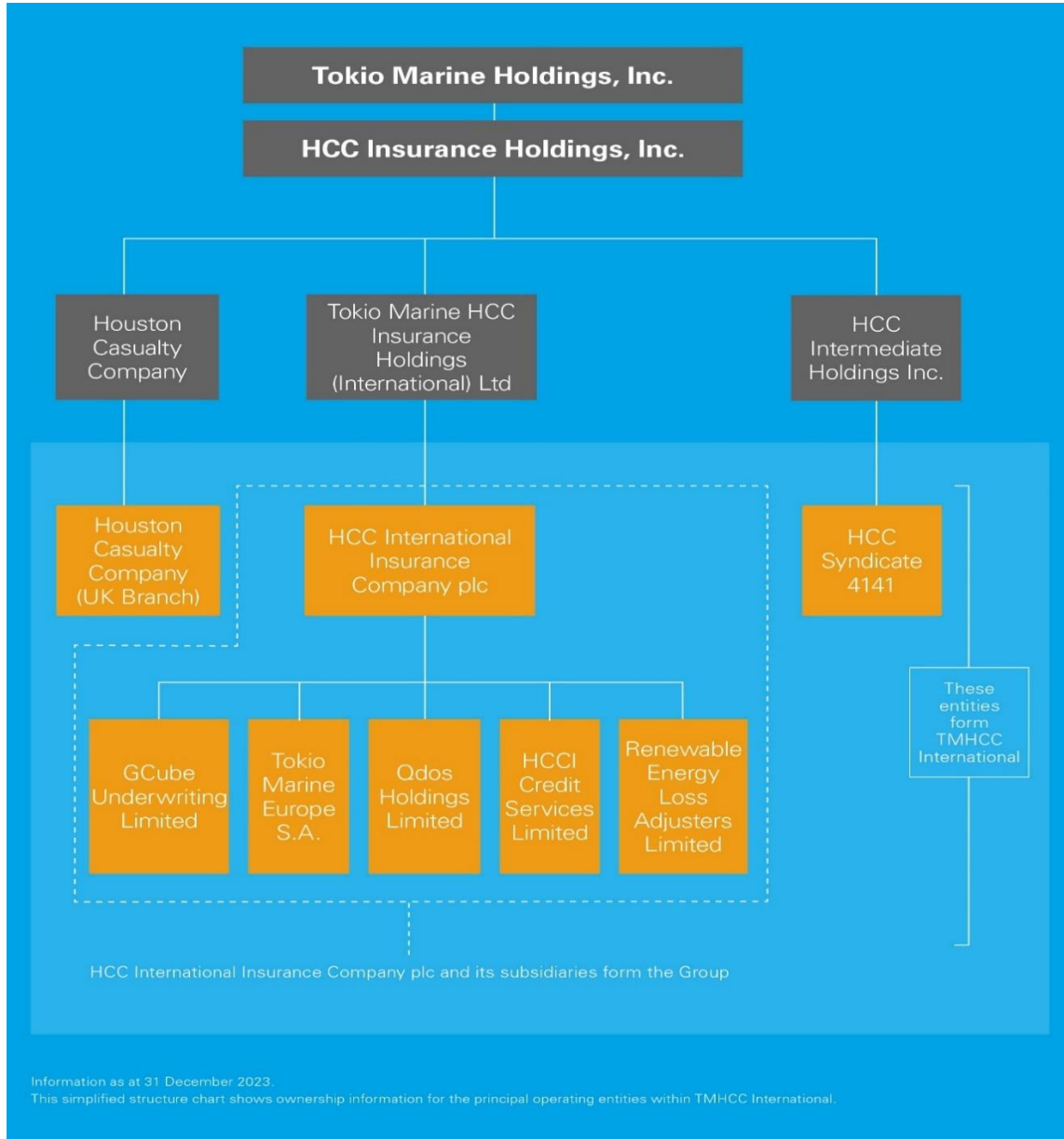
Section E further describes the policies and processes employed by the Group for managing its Own Funds and provides information on the structure of Own Funds and calculation of SCR.

## Section A – Business and Performance

### A1 – Business

#### Organisational Structure

The Group’s immediate parent is HCC Insurance Holdings, Inc. which is based in Houston, United States of America, and holds 100% of the share capital of TMHCCI(H) through its direct shareholding. A detailed schematic of the organisation structure of the Group is shown below, followed by brief descriptions of each of the companies; all companies are wholly owned. There are small, immaterial differences between the scope of the Group used for the consolidated financial statements and that used for determining the consolidated data for the calculation of Group solvency. These differences relate to subsidiaries held by TMHCCI(H) which remain as participation on the face of the Group Solvency II balance sheet.



#### Strategy

The Group’s fundamental strategic goal is to produce an underwriting profit and investment income resulting in consistent net earnings that will increase shareholder value. This has been consistently accomplished through diversified businesses led by those who are the best in the business, a comprehensive reinsurance programme and a conservative investment policy. This strategic



approach is supported by TMHCC International's culture, which is underpinned by its core values of professionalism, discipline, honesty, respect and trust.

Information relating to the business model and strategy is included in the Strategic Report within the Annual Report and Accounts.

### **TMHCCIH(I) /The Group**

TMHCCIH(I) is part of Tokio Marine, whose ultimate holding company is Tokio Marine Holdings, Inc. Tokio Marine is a leading international insurance group located in Tokyo, Japan that has 268 subsidiaries and 26 affiliates located worldwide, which undertake non-life and life insurance and operate within the financial and general business sectors (including consulting and real estate).

As of 31 December 2023, Tokio Marine had total assets of ¥30 trillion (2022: ¥29 trillion) and shareholders' equity of ¥2 trillion (2022: ¥2 trillion). Tokio Marine and a number of its major insurance companies have a financial strength rating of A+ (Stable) from S&P.

HCC Insurance Holdings, Inc. (TMHCC Group) is a subsidiary of Tokio Marine based in the United States (US) and is a leading international Specialty Insurance group with more than 100 classes of Specialty Insurance. It underwrites risks located in approximately 180 countries. Given its financial strength and track record of excellent results, it benefits from an S&P rating of A-.

TMHCC International, which had GWP of \$2.77 billion in 2023 (2022: \$2.49 billion), is the operating segment outside of the US.

At 31 December 2023, the Group's subsidiaries are:

- HCCII; the principal trading subsidiary with a standalone S&P rating of A+. HCCII underwrites a variety of lines including Treaty Reinsurance, Property Direct and Facultative, Delegated Property, Property D&F & Accident and Health, Energy, Marine (Hull, Liability and, Cargo), Professional Risks, Financial Lines, Credit and Political Risk, Credit & Surety, Gcube, Contingency and Japanese Business (J Business).
- TME; a wholly-owned subsidiary of HCCII with a standalone S&P rating of A+, is a non-life insurance company incorporated on 8 February 2018 as a public limited liability company ("Société Anonyme") subject to the general company law of Luxembourg. TME is registered with the Registre de Commerce et des Sociétés in Luxembourg. TME is authorised under the law on the insurance sector of 7 December 2015 and supervised by the Commissariat Aux Assurances (CAA).
- GCube Underwriting Limited (GCube), an underwriting agency, that is one of the largest global writers of renewable energy, covering wind, solar, bio, hydro, wave and tidal projects.
- Qdos Holdings Limited (QHL), a UK holding company and its wholly owned subsidiary [and underwriting agency], Qdos Broker and Underwriting Services Limited (QBuS). These distribute Professional Indemnity (PI), Employers' and Public Liability (EL & PL) and Tax Enquiry and Liability insurance to the UK small contractor market via Qdos Shop, an online digital distribution platform.
- HCCI Credit Services Limited (Credit Servies), provides data and information services and procurement of other services integral to the underwriting of several products within the International Specialty business.
- Renewable Energy Loss Adjusters Limited (RELA) provides loss adjusting services to insurers of large renewable energy projects.
- Rattner Mackenzie Limited (Jordan); in the process of being dissolved.
- HCC Diversificacion Y Solucion. The Company's purpose is to provide management and control services for the services fees on behalf of Tokio Marine Europe SA, Spanish Branch, for its Transactional Risk Insurance (TRI) book of business.

### **HCCII and Significant Branches**

HCCII is based in the UK and conducts business through its principal offices in London, its regional offices across the UK and its branch in Switzerland. The Group's EEA business was conducted by TME through its branches in Spain, Ireland, France, Germany, Italy, Denmark, Belgium, Norway and the Netherlands. In January 2024, notifications for the closure of the Norwegian branch were duly submitted to both Norwegian Authorities and the CAA. The Norwegian Business Registry has completed the deregistration process of the Norwegian branch, and the branch was officially removed from the registry on 25 January 2024. HCCII also accepts inwards reinsurance risks from the US, Canada and Australia. Following the UK's exit from the EU on 31 January 2020 and the end of the transition period on 31 December 2020, any EEA risks presented in the London Market and/or previously written by the UK branch, have been written by TME's EEA branches from 1 January 2021, utilising the expertise of the specialist underwriters in the UK via the TME UK branch.

### **Basis of Consolidation**

Within TMHCCIH(I), TME and HCCII are consolidated on a line-by-line basis using the accounting consolidation-based method. TMHCCIH(I) Eligible Own Funds as at 31 December 2023 total \$1,309 million (2022: \$1,035 million).

It should be noted that the subsidiaries held by HCCII, namely TME, Qdos Holdings Limited, Qdos Broker and Underwriting Services Limited, HCCI Credit Services Limited, Gcube, HCC Diversificacion Y Solucion and Renewable Energy Loss Adjusters Limited are included as 'participations and related undertakings' in the Company's financial statements.

The subsidiaries held by TMHCCI(H) are eliminated on consolidation in the assets of the Group, except for the Group's investment in Qdos and Gcube, as these do not meet the definition of an 'ancillary services undertaking', per Article 335 of the Delegated Acts. As a result, this investment remains as a participation on the face of the Group Solvency II balance sheet. Therefore, the Group's participation includes items present on the balance sheets of Qdos and Gcube, which under UK GAAP are fully consolidated.

## Auditor and Regulatory Bodies

The regulatory supervisor and external auditor for the Group and the Company are set out below:

<i>Group Supervisor (Prudential Risk)</i>	<i>Group Supervisor (Conduct Risk)</i>	<i>Group Auditors</i>
Prudential Regulatory Authority Bank of England 20 Moorgate London	Financial Conduct Authority 25 The North Colonnade Canary Wharf London	PricewaterhouseCoopers LLP 7 More London Riverside London SE1 2RT

## A2 – Underwriting Performance

A summary of key financial information for 2023 and prior year, for the Group and Company, can be found below:

	2023	2022
Group	\$'000	\$'000
Gross written premium	1,783,258	1,681,274
Net premium earned	1,114,950	1,088,001
Underwriting result (technical account pre-investment income)	154,442	220,032
Net loss ratio	51%	48%
Net combined ratio	86%	80%
Investment income (transferred to technical account)	54,535	34,993
Profit/(loss) on ordinary activities before tax	253,748	(9,604)
Solvency II Cash and investments (excluding investment in subs and land and buildings)	2,760,543	2,258,737
Solvency II Own Funds	1,308,445	1,034,763

	2023	2022
Company	\$'000	\$'000
Gross written premium	1,252,798	1,176,442
Net premium earned	894,835	886,987
Underwriting result (technical account pre-investment income)	80,955	194,997
Net loss ratio	55%	46%
Net combined ratio	91%	78%
Investment income (transferred to technical account)	44,257	28,946
Profit on ordinary activities before tax	174,886	24,182
Solvency II Cash and investments (excluding investment in subs and land and buildings)	2,223,495	1,757,206
Solvency II Own Funds	1,300,115	1,030,625

There are small differences between Group SFCR and the HCCII Consolidated Annual Report & Accounts, as a result of the profits arising from Rattner Mackenzie Ltd (Jordan) which sits between TMHCCI(H) and the HCCII Consolidated Accounts. The loss before tax in 2023 equated to \$0.0 million (2022: profit before tax of \$0.1 million).

### The Group

The Group has performed well in 2023 with GWP of \$1.8 billion, up 6% (\$102 million). This reflects growth in the underlying portfolio, particularly London Market (up 12%) with market conditions more variable in International Specialty (up 2%). Growth in London Market is a result of the improved rating environment in Treaty Reinsurance, as well as Marine Liability, Energy and Delegated Property, which benefitted from strong renewals and new business from positive market conditions. International Specialty has had growth in Professional Risks, and Surety due to ongoing strong rating environments and market conditions. Contingency and Disability continue to perform well post Covid. These positive factors in International Specialty have been largely offset by the impact on GWP of challenging market conditions in the Financial Lines portfolio.

The underwriting result on the technical account excluding investment income was \$154 million (2022: \$220 million), resulting in a combined ratio of 86% (2022: 80%), with strong profits from both the International Specialty and London Market segments. The decrease from 2022 was largely driven by several large Surety losses, higher reinsurance costs coupled with some reserve strengthening in the London Market segment. Additionally, the Group has continued to invest in its people and infrastructure to support current and future growth.

For the financial year 2023, the Group made a net profit before tax of \$254 million (2022: \$10 million loss) of which \$209 million profit (2022: \$255 million) was from the technical account for general business which included investment income of \$55 million (2022: \$35 million). The investment return contributed significant volatility to the Group's results compared with the prior year, due to the movement in unrealised gains/losses consistent with market conditions and the US interest rate environment.

In 2023, unrealised gains on the Group's fixed income portfolio totalled \$79 million (2022: \$234 million loss) consistent with performance of the bond markets. The Group's investment approach is to hold investments to maturity which will result in a reversal of unrealised losses and gains over time. FX losses totalled \$7 million (2022: \$7 million). The non-technical account items also included amortisation of goodwill and intangible assets totalling \$11 million (2022: \$10 million) and other operating expenses.

### The Company

The Company made a net profit before tax for the financial year of \$175 million (2022: \$24 million) and includes a balance on the technical account for general business of \$125 million (2022: \$224 million), which included investment income of \$44 million (2022: \$29 million).

The variance between the Group and the Company's net underwriting result is in relation to TME, with further details shown in the TME SFCR.

## Underwriting Performance by Line of Business

The Group has three core underwriting segments: International Specialty, London Market, and J Business. International Specialty is comprised of Professional Risks, Financial Lines, Credit and Political Risk, Surety and Contingency. London Market business is comprised of Property Direct and Facultative, Delegated Property, Treaty Reinsurance, Property D&F & Accident and Health, and Marine and Energy. The J Business segment consists of commercial insurance coverage provided to Japanese corporate clients in respect of their overseas business interests. This coverage includes J Business Property, J Business Marine & Aviation and J Business Liability. These segments execute the Group and Company's strategy of underwriting diversified businesses led by those who are the best in the business, a comprehensive reinsurance programme, and a conservative investment policy.

In the London Market segment, the 2023 technical result was \$70 million (2022: \$95 million). Results were impacted by higher reinsurance costs and reserve strengthening, against a backdrop of benign loss activity and prior year reserve releases in 2022.

In the International Specialty segment, the 2023 technical result was \$82 million (2022: \$119 million). The reduction in the result reflects the flat top line growth, several large Surety losses and challenging market conditions in Financial Lines, partially offset by Professional Risks outperforming expectations in both top line growth and loss experience.

In 2023, the J Business segment contributed \$6 million (2022: \$7 million) to the technical result. Given the nature and complexity of the J Business and its importance to the larger global portfolio, the business is fully ceded within Tokio Marine to Tokio Marine & Nichido Fire. The contribution to the technical result represents the ceding commission, which is set to achieve moderate profit for the Group and covers the acquisition and operating costs of the business.

Group	31 December 2023		31 December 2022	
	Net earned premium	Underwriting result	Net earned premium	Underwriting result
	\$'000	\$'000	\$'000	\$'000
<b>Specialty</b>				
Financial Lines	176,609	7,438	205,290	12,315
Surety	81,348	(20,147)	93,674	19,769
Contingency & Disability	21,714	14,390	19,598	3,293
Credit & Political Risk	118,511	40,945	121,442	34,685
Professional Risks	221,647	53,585	214,663	58,494
Other Specialty	35,108	(14,202)	31,026	(9,767)
<b>Total Specialty</b>	<b>654,937</b>	<b>82,009</b>	<b>685,693</b>	<b>118,789</b>
<b>London Market</b>				
Treaty Reinsurance	143,169	28,453	105,093	59,553
Marine & Energy	139,983	16,418	133,390	23,055
Delegated Property	114,052	6,366	96,148	7,953
Property D&F & Accident and Health	62,809	14,758	67,707	3,962
<b>Total London Market</b>	<b>460,013</b>	<b>65,995</b>	<b>402,338</b>	<b>94,523</b>
<b>Total J Business</b>	<b>-</b>	<b>6,438</b>	<b>-</b>	<b>6,720</b>
<b>Total</b>	<b>1,114,950</b>	<b>154,442</b>	<b>1,088,001</b>	<b>220,032</b>

Company	31 December 2023		31 December 2022	
	Net earned premium	Underwriting result	Net earned premium	Underwriting result
	\$'000	\$'000	\$'000	\$'000
<b>Specialty</b>				
Financial Lines	176,635	(5,203)	205,130	2,715
Surety	39,658	(37,960)	48,937	15,968
Contingency & Disability	4,507	9,103	2,948	1,174
Credit & Political Risk	101,968	34,104	108,100	31,334
Professional Risks	209,272	50,075	204,016	56,268
Other Specialty	808	(5,297)	451	(7,502)
<b>Total Specialty</b>	<b>532,848</b>	<b>44,822</b>	<b>569,582</b>	<b>99,957</b>
<b>London Market</b>				
Treaty Reinsurance	108,263	12,033	80,017	59,063
Marine & Energy	104,880	9,617	99,233	20,197
Delegated Property	103,662	4,420	88,638	8,082
Property D&F & Accident and Health	45,182	7,850	49,517	5,494
<b>Total London Market</b>	<b>361,987</b>	<b>33,920</b>	<b>317,405</b>	<b>92,836</b>
<b>Total J Business</b>	<b>-</b>	<b>2,213</b>	<b>-</b>	<b>2,204</b>
<b>Total</b>	<b>894,835</b>	<b>80,955</b>	<b>886,987</b>	<b>194,997</b>

## Underwriting Performance by Solvency II Lines of Business

Solvency II requires sixteen different product classifications which are classified differently to how the business is managed.

The following table provides insight into the mapping of business between Group and Company LOBs and Solvency II LOBs.

The Solvency II LOB is applied at an individual policy level, meaning that Solvency II LOBs can be found across multiple Group and Company LOBs. Likewise, the following is not an exhaustive mapping between Group and Company and Solvency II LOBs.

TMHCC International LOB	Solvency II LOB
Financial Lines	Direct & Proportional General liability insurance Non-proportional casualty reinsurance
Surety	Direct Credit and suretyship insurance Non-proportional property reinsurance
Contingency & Disability	Direct & Proportional Income protection insurance Non-proportional health reinsurance
Credit & Political Risk	Direct Credit and suretyship insurance
Professional Risks	Direct General liability insurance
Other Specialty	Direct Miscellaneous financial loss Direct Income protection insurance Non-proportional health reinsurance
Property & Treaty Reinsurance	Non-proportional property reinsurance Direct & Proportional Fire and other damage to property insurance
Energy & Marine	Direct & Proportional marine, aviation and transport insurance Non-proportional marine, aviation and transport reinsurance
Delegated Property	Direct & Proportional Fire and other damage to property insurance
Property D&F & Accident and Health	Non-proportional health reinsurance Direct & Proportional Income protection insurance Direct & Proportional Medical expense insurance
J Business	Non-proportional property reinsurance Direct & Proportional Fire and other damage to property insurance
European Business	Direct & Proportional marine, aviation and transport insurance Non-proportional marine, aviation and transport reinsurance

The GWP and underwriting results of the top five Solvency II lines, for the year ended 31 December 2023 and prior year, for the Group and Company, are as follows.

Group	General liability insurance	Credit and suretyship insurance	Marine, aviation, transport	Fire and other damage to property	Non-prop property	Other	Total
31 December 2023	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
<b>Gross written premium</b>	<b>521,539</b>	<b>248,942</b>	<b>226,521</b>	<b>272,325</b>	<b>277,466</b>	<b>236,465</b>	<b>1,783,258</b>
Net earned premium	348,418	191,667	124,846	148,984	167,101	133,934	1,114,950
Net claims	(162,135)	(77,521)	(40,759)	(70,671)	(109,696)	(93,704)	(554,486)
Net expenses	(117,319)	(75,430)	(46,116)	(76,445)	(58,604)	(32,108)	(406,022)
<b>Underwriting result</b>	<b>68,964</b>	<b>38,716</b>	<b>37,971</b>	<b>1,868</b>	<b>(1,199)</b>	<b>8,122</b>	<b>154,442</b>

Group	General liability insurance	Credit and suretyship insurance	Marine, aviation, transport	Fire and other damage to property	Non-prop property	Other	Total
31 December 2022	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
<b>Gross written premium</b>	<b>550,334</b>	<b>223,350</b>	<b>219,718</b>	<b>297,944</b>	<b>171,406</b>	<b>218,521</b>	<b>1,681,273</b>
Net earned premium	364,339	174,251	127,950	154,459	138,311	128,691	1,088,001
Net claims	(199,475)	(81,575)	(51,872)	(68,958)	(38,569)	(83,783)	(524,232)
Net expenses	(100,651)	(69,622)	(38,335)	(60,836)	(39,463)	(34,830)	(343,737)
<b>Underwriting result</b>	<b>64,213</b>	<b>23,054</b>	<b>37,743</b>	<b>24,665</b>	<b>60,279</b>	<b>10,078</b>	<b>220,032</b>

Company	General liability insurance	Credit and suretyship insurance	Marine, aviation, transport	Fire and other damage to property	Non-prop property	Other	Total
31 December 2023	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
<b>Gross written premium</b>	<b>420,314</b>	<b>180,222</b>	<b>87,850</b>	<b>182,165</b>	<b>219,331</b>	<b>162,916</b>	<b>1,252,798</b>
Net earned premium	346,556	141,509	56,955	123,882	129,306	96,627	894,835
Net claims	(162,890)	(64,112)	(11,040)	(61,439)	(109,517)	(75,153)	(484,151)
Net expenses	(117,551)	(54,722)	(17,158)	(59,916)	(41,974)	(38,408)	(329,729)
<b>Underwriting result</b>	<b>66,115</b>	<b>22,675</b>	<b>28,757</b>	<b>2,527</b>	<b>(22,185)</b>	<b>(16,934)</b>	<b>80,955</b>

Company	General liability insurance	Credit and suretyship insurance	Marine, aviation, transport	Fire and other damage to property	Non-prop Property	Other	Total
31 December 2022	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
<b>Gross written premium</b>	<b>436,732</b>	<b>169,588</b>	<b>95,055</b>	<b>201,063</b>	<b>130,862</b>	<b>143,142</b>	<b>1,176,442</b>
Net earned premium	364,909	125,087	63,523	137,323	105,204	90,941	886,987
Net claims	(201,196)	(49,863)	(33,308)	(53,985)	(21,939)	(44,895)	(405,186)
Net expenses	(98,765)	(52,909)	(15,450)	(53,727)	(29,196)	(36,757)	(286,804)
<b>Underwriting result</b>	<b>64,948</b>	<b>22,315</b>	<b>14,765</b>	<b>29,611</b>	<b>54,069</b>	<b>9,289</b>	<b>194,997</b>

## Underwriting Performance by Solvency II Lines of Business: Group

### General Liability

These classes are comprised principally of the Directors and Officers and Cyber components of Financial Lines business, and portions of Professional Risks.

Financial Lines: GWP decreased by 11%, continuing the trend we began to see in the second half of 2022. Our Transaction Risk Insurance (TRI) business has been impacted by the dampened M&A market as a result of ongoing global instability and our Cyber business by intensifying market competition. The Group has maintained a conservative underwriting approach and discipline in this challenging market.

Professional Risks: GWP increased by 7%. The business includes two main product lines – PI and Liability – growth has slowed from previous years as we approach a market saturation point in the UK.

## Credit and Suretyship

This class of business is comprised principally of the Credit and Political Risk, and Surety LOBs.

Credit & Political Risk: GWP increased by 3%. The Group offers a full range of Credit & Political Risk insurance solutions for both financial institutions and commercial companies. The Trade Credit team, is one of the leading credit insurers in the UK, distinguishing the Group with high service standards in both underwriting and claims handling positions and with high client retention. The UK market continues to be impacted by economic uncertainty and a weak rating environment; however, the Group benefitted from some insureds choosing to renew with two-year policies to take advantage of the weak rating environment. Market conditions in political risk remain positive, however the Group's underwriters continue to exercise caution given the trend of global political instability.

Contingency, Disability & Other: GWP increased by 13%. The contingency book had significant recovery following the impact of COVID-19 and continues to demonstrate strong renewals alongside a strong ratings environment. Other comprises a portfolio of Marine Transport business and Kidnap and Ransom business.

## Marine, Aviation and Transport

Marine & Energy: GWP remained flat and comprises Energy, Marine Hull, Marine Liability and Marine Cargo. Rating conditions have been positive with the exception of GCube as a result of increased competition in the renewable energy market.

## Fire and other Damage to Property Insurance & Non-Proportional Property

The property LOB includes Treaty Reinsurance, Delegated Property, Property Direct and Facultative, and Surety (discussed above) LOBs.

Treaty Reinsurance: GWP increased by 43%. This portfolio comprises principally non-US excess of loss reinsurance business. Top line growth has been driven by significant rating environment improvements following catastrophe experience in recent years. We have responded to this by deploying more capital to take advantage of the favourable market conditions, with significant capital deployed in the US, leveraging TMHCIs other insurance platforms.

Property Direct & Facultative: GWP decreased by 7% driven by choice of paper, with significant growth in this line seen in our other insurance platforms.

Delegated Property: GWP increased by 9%, reflecting a stabilisation in this relatively new line of business following significant growth in recent years.

Surety: GWP increased by 21% reflecting the positive ratings environment. Both Group and Company experienced an underwriting loss in this segment due to severe large Surety losses.

## Other

This comprises principally of Non-proportional Marine business, Income protection, Non-Proportional Health, Medical Expense and Miscellaneous Financial Loss.

## Underwriting Performance by Solvency II Geographic Location

In conformity with Solvency II requirements whereby the 'geographic location' is defined by either underwriter or risk location dependent upon type of business, the following provides the GWP and underwriting results of the UK and top 5 locations by geographic location, for the year ended 31 December 2023 and prior year for the Group and Company:

Group	United Kingdom	Spain	Germany	France	Italy	Netherlands	Other	Total
31 December 2023	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
<b>Gross written premium</b>	<b>837,712</b>	<b>190,083</b>	<b>109,868</b>	<b>102,233</b>	<b>53,375</b>	<b>39,502</b>	<b>450,485</b>	<b>1,783,258</b>
Net earned premium	600,007	24,899	29,041	63,115	25,255	20,354	352,279	1,114,950
Net claims	(280,209)	(27,231)	(11,860)	(46,354)	(9,300)	(2,917)	(176,615)	(554,486)
Net expenses	(204,629)	(2,101)	(7,066)	(30,256)	(5,227)	(7,264)	(149,479)	(406,022)
<b>Underwriting result</b>	<b>115,169</b>	<b>(4,433)</b>	<b>10,115</b>	<b>(13,495)</b>	<b>10,728</b>	<b>10,173</b>	<b>26,185</b>	<b>154,442</b>

Group	United Kingdom	Spain	France	Germany	Italy	Switzerland	Other	Total
31 December 2022	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
<b>Gross written premium</b>	<b>795,552</b>	<b>198,005</b>	<b>98,463</b>	<b>90,205</b>	<b>57,216</b>	<b>41,566</b>	<b>400,266</b>	<b>1,681,273</b>
Net earned premium	581,950	38,688	28,974	47,664	22,050	31,182	337,492	1,088,000
Net claims	(257,558)	(42,336)	(37,294)	(35,536)	(6,694)	(16,832)	(127,982)	(524,232)
Net expenses	(169,078)	(4,379)	(2,784)	(27,327)	(12,934)	(8,061)	(119,173)	(343,736)
<b>Underwriting result</b>	<b>155,314</b>	<b>(8,027)</b>	<b>(11,104)</b>	<b>(15,199)</b>	<b>2,422</b>	<b>6,289</b>	<b>90,337</b>	<b>220,032</b>

Company	United Kingdom	United States	Singapore	Australia	Switzerland	India	Other	Total
31 December 2023	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
<b>Gross written premium</b>	<b>803,222</b>	<b>33,565</b>	<b>30,910</b>	<b>27,055</b>	<b>22,640</b>	<b>23,406</b>	<b>312,000</b>	<b>1,252,798</b>
Net earned premium	581,168	3,590	28,324	15,184	11,224	21,787	233,558	894,835
Net claims	(267,833)	(18,960)	(16,707)	(3,720)	(9,535)	(8,370)	(159,026)	(484,151)
Net expenses	(188,836)	(8,133)	(10,040)	(2,913)	(5,013)	(9,480)	(105,314)	(329,729)
<b>Underwriting result</b>	<b>124,499</b>	<b>(23,503)</b>	<b>1,577</b>	<b>8,551</b>	<b>(3,324)</b>	<b>3,937</b>	<b>-30,782</b>	<b>80,955</b>

Company	United Kingdom	Switzerland	Australia	Israel	Singapore	Mexico	Other	Total
31 December 2022	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000	\$'000
<b>Gross written premium</b>	<b>729,728</b>	<b>42,342</b>	<b>43,624</b>	<b>23,314</b>	<b>36,746</b>	<b>20,874</b>	<b>279,814</b>	<b>1,176,442</b>
Net earned premium	547,184	10,058	33,763	15,879	30,815	10,219	239,069	886,987
Net claims	(232,313)	(3,109)	(18,497)	(1,724)	(15,103)	(2,396)	(132,044)	(405,186)
Net expenses	(159,296)	(10,357)	(7,987)	(3,731)	(6,943)	(2,669)	(95,821)	(286,804)
<b>Underwriting result</b>	<b>155,575</b>	<b>(3,408)</b>	<b>7,279</b>	<b>10,424</b>	<b>8,769</b>	<b>5,154</b>	<b>11,204</b>	<b>194,997</b>



## A3 – Investment Performance

New England Asset Management (NEAM) is the investment manager for the US Dollar, Sterling, Euro and Swiss Franc funds, which consist primarily of a portfolio of highly rated corporate and municipal bonds, that have an average rating of A+ and do not include any securities with less than a BBB rating. The portfolio also includes bonds guaranteed by the US, UK and German governments. The average duration of the aggregate portfolios was 4 years (2022: 4 years). Delphi Financial Group, Inc., an investment manager within the Tokio Marine Group of companies, manages the alternative investment class, which comprises 3% of the Group's consolidated invested assets as at 31 December 2023 (2022: 3%).

GROUP	Gross investment income	Realised gains and losses	Technical earned investment income	Unrealised gains / losses	Total earned investment income
Asset classes					
31 December 2023	\$'000	\$'000	\$'000	\$'000	\$'000
Corporate bonds	32,573	(208)	32,365	43,688	76,053
Government bonds	14,542	(546)	13,996	21,142	35,138
Collective investment undertakings	-	-	-	5,258	5,258
Collateralised securities	11,431	-	11,431	9,004	20,436
Short term deposits	-	-	-	-	-
<b>Total</b>	<b>58,546</b>	<b>(754)</b>	<b>57,792</b>	<b>79,092</b>	<b>136,885</b>
Investment expense			(3,257)		(3,257)
<b>Technical earned investment income</b>			<b>54,535</b>		<b>133,628</b>
Bank interest					5,047
<b>Total earned investment income</b>					<b>138,675</b>

GROUP	Gross investment income	Realised gains and losses	Technical earned investment income	Unrealised gains / (losses)	Total earned investment income
Asset classes					
31 December 2022	\$'000	\$'000	\$'000	\$'000	\$'000
Corporate bonds	17,660	4	17,664	(100,155)	(82,491)
Government bonds	12,676	-	12,677	(92,032)	(79,355)
Collective investment undertakings	-	-	-	5,889	5,889
Collateralised securities	7,425	-	7,425	(47,921)	(40,496)
Short term deposits	71	-	71	-	71
<b>Total</b>	<b>37,832</b>	<b>4</b>	<b>37,837</b>	<b>(234,219)</b>	<b>(196,382)</b>
Investment expense			(2,842)		(2,842)
<b>Technical earned investment income</b>			<b>34,995</b>		<b>(199,224)</b>
Bank interest					608
<b>Total earned investment income</b>					<b>(198,616)</b>

Net earned investment income (excluding the unrealised gains and losses) totalled \$55 million (2022: \$35 million). Including unrealised gains and losses and bank interest, the total investment gain for the Group is \$139 million (2022: \$199 million loss).

In 2023, the change in the fair value of the investment portfolio generated unrealised gains of \$79 million, which comprised total unrealised gains of \$54 million for the year net of unrealised FX gain of \$25 million. This is principally driven by improving leading global economies and predictions regarding interest rate cuts in 2024.

The performance of the Company's portfolio, for the year ended 31 December 2023 and prior year, is as follows:

COMPANY	Gross investment income	Realised gains and losses	Technical earned investment income	Unrealised gains / (losses)	Total earned investment income
Asset classes					
31 December 2023	\$'000	\$'000	\$'000	\$'000	\$'000
Corporate bonds	24,585	(115)	24,470	32,014	56,485
Government bonds	12,386	(425)	11,960	18,085	30,045
Collective investment undertakings	-	-	-	5,258	5,258
Collateralised securities	10,299	-	10,299	8,442	18,741
<b>Total</b>	<b>47,270</b>	<b>(540)</b>	<b>46,729</b>	<b>63,799</b>	<b>110,529</b>
Investment expense			(2,473)		(2,473)
<b>Technical earned investment income / (expense)</b>			<b>44,257</b>		<b>108,056</b>
Bank interest					3,798
<b>Total earned investment income / (expense)</b>					<b>111,855</b>

COMPANY	Gross investment income	Realised gains and losses	Technical earned investment income	Unrealised gains / (losses)	Total earned investment income
Asset classes					
31 December 2022	\$'000	\$'000	\$'000	\$'000	\$'000
Corporate bonds	13,572	17	13,589	(78,395)	(64,806)
Government bonds	10,564	-	10,564	(77,140)	(66,576)
Collective investment undertakings	-	-	-	5,889	5,889
Collateralised securities	6,875	-	6,875	(44,737)	(37,862)
<b>Total</b>	<b>31,011</b>	<b>17</b>	<b>31,028</b>	<b>(194,383)</b>	<b>(163,355)</b>
Investment expense			(2,082)		(2,082)
<b>Technical earned investment income / (expense)</b>			<b>28,946</b>		<b>(165,436)</b>
Bank interest					362
<b>Total earned investment income / (expense)</b>					<b>(165,074)</b>

The performance of the investment portfolio, as recorded in the technical account, is \$44 million (2022: \$29 million). Including unrealised gains and losses and bank interest, the total investment gain for the Company is \$112 million (2022: \$165 million loss). Unrealised gains of \$64 million (2022: \$194 million) experienced during the year have been driven by the same factors that have driven Unrealised Gains in Group.

There are no gains or losses recognised directly in equity.

## *A4 – Performance of Other Activities*

Other charges and income incurred by the Group and Company for the year, not included within the technical account, were:

<b>31 December 2023</b>	<b>Group \$'000</b>	<b>Company \$'000</b>
Corporate oversight costs	16,026	7,111
Service awards	5,963	3,865
Amortisation of goodwill	6,923	-
Amortisation of intangibles	3,611	-
<b>Total other charges</b>	<b>32,523</b>	<b>10,976</b>

The corresponding table for 2022 for the Group and Company is shown below:

<b>31 December 2022</b>	<b>Group \$'000</b>	<b>Company \$'000</b>
Corporate oversight costs	9,475	3,891
Service awards	4,607	3,387
Amortisation of goodwill	8,578	-
Amortisation of intangibles	1,489	-
<b>Total other charges</b>	<b>24,149</b>	<b>7,278</b>

## *A5 – Any Other Information*

There is no other material information to be disclosed.

## Section B – System of Governance

### B1 – General Information on the System of Governance

#### The Group’s governance

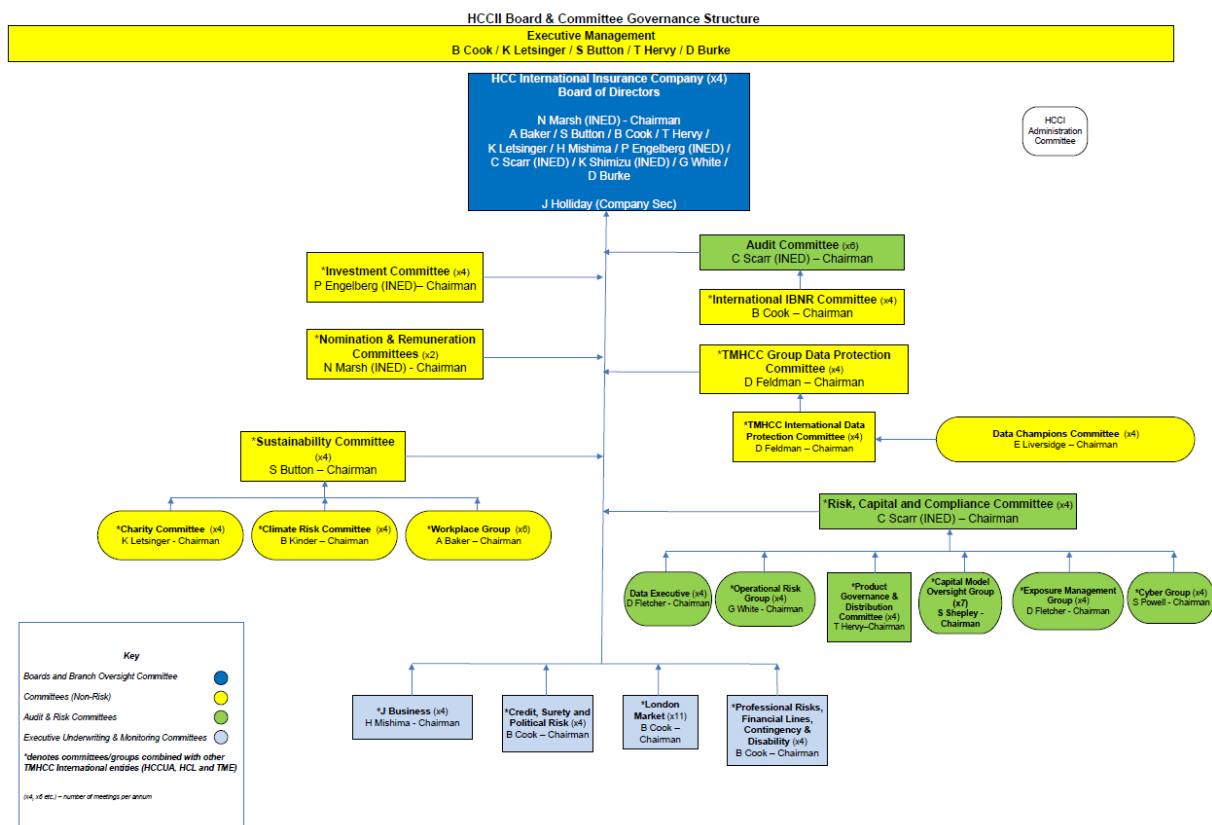
The Group’s Board is comprised of B J Cook, Chief Executive Officer of TMHCC International and K L Letsinger, Group Chief Financial Officer of TMHCC International, both of whom are also Directors of HCCII, and T Weist, Executive Vice President and Chief Financial Officer of HCC Insurance Holdings, Inc. the Group’s immediate parent company.

Board meetings are held for the Group on an ad hoc basis to approve accounts, share issues, agree company strike-offs of subsidiary companies and any other ad hoc responsibilities.

The information contained within the remainder of this section relates to the System of Governance for the Company. However, as the Company and its subsidiaries, are the only risk-bearing entities of the Group, the risk management, internal control systems and reporting procedures are aligned between both the Company and the Group. The system of governance has not changed materially during the year.

#### Overview of the Company’s Board and Committee Structure

The oversight of the Company’s business and its operations are provided through its governance structure, in which the management of risk plays a significant part. Governance starts with the Company’s Board, which has overall responsibility for management of the Company through providing leadership of the Company within a framework of prudent and effective controls. The organisation chart below provides a high-level overview of the Company’s governance structure.



## Board of Directors

The Board is responsible for the overall management and direction of the business and affairs in the Company, promoting the long-term sustainable success of the Company, and generating value for all stakeholders. In carrying out its duties, the Board may exercise all the powers of the Company, subject to any relevant laws and regulations and to the Articles of Association (Articles).

The principal responsibilities of the Board are to:

- ensure the effective and entrepreneurial leadership of the Company within an appropriate corporate governance framework and prudent and effective controls which enables risk to be assessed and managed;
- the establishment of the Company's purpose, values and strategy;
- monitor performance and make recommendations to ensure alignment to the strategy, business plan and budget;
- monitor of culture to ensure that the Company's culture is aligned with its purpose, values and strategy;
- ensure all directors act with integrity, lead by example, and promote the desired culture of the Company;
- ensure that the Company's purpose and strategy is aligned with the delivery of good customer outcomes throughout the product lifecycle and to promote a culture throughout the organisation that supports delivery of those outcomes ;
- to oversee the Company's relationship with its regulators, including its reporting to and correspondence with regulators;
- regularly evaluate the performance and effectiveness of the Board;
- oversee the Company's operations ensuring:
  - competent and prudent management;
  - sound planning and risk management;
  - maintenance of adequate management and internal control systems;
  - adequate accounting and other records;
  - consideration of sustainability (environment, social and governance) matters ensuring it acts as a 'Good Company' in line with its purpose values and strategy; and
  - compliance with its Articles of Association, statutory and regulatory obligations
- ensure that the necessary resources are in place for the Company to meet its objectives and enable it to review its performance against its strategy, objectives, business plans and budgets; and
- undertake appropriate training to ensure that any UK regulatory requirements in relation to professional development are met. Non-Executive Board members who have specific roles, such a Whistleblowing or Customer Champion, will have a responsibility to ensure that they have the appropriate training and skills to support the Chair and Chief Executive Officer

There is a Schedule of Matters reserved for the Board.

All authority in the Company flows from the Board but is assisted in the discharge of its duties by a number of Committees. Each Committee has defined areas of responsibility which are set out in each Committee's terms of reference. Each year the governance structure and the terms of reference are reviewed to ensure they remain both up to date and appropriate.

The Board is comprised of executive Directors, independent non-executive Directors and a non-executive director (shareholder representative) and possesses a combination of skills, experience, and knowledge that cover the Company's main business areas, ensuring appropriate challenge and debate. This enables the Board to make informed decisions and provide effective oversight of the risks.

## Audit Committee

The main responsibilities of the Audit Committee are to monitor and review:

- the integrity of the financial statements and related announcements;
- the effectiveness of the internal financial controls;
- the effectiveness of the internal and external audit processes;
- the relationship with the external auditors; and
- the effectiveness of the whistleblowing procedures

## TMHCC Group Data Protection Committee

The TMHCC Group Data Protection Committee covers all TMHCC Group entities including the Company. The Committee's purpose is to:

- discuss and shape the Group-wide data protection strategy, and recommend it to the relevant TMHCC International TMHCC Group Boards for approval;
- identify areas where the US, UK and Europe should share knowledge and resources;

- identify areas where the US, UK and Europe should agree a common approach to an aspect of Data Protection practice/policy or reporting;
- consider any red flags/major issues raised by the sub-committees (including information on data breaches, or failure to meet deadlines for responding to requests from data subjects); and
- oversight of its sub-committees

### **Executive Underwriting & Monitoring Committees**

The main purpose of the four Executive Underwriting & Monitoring Committees (EUMC) (London Market; Credit, Surety and Political Risk; Professional Risks, Financial Lines, Contingency and Disability; and J-Business) is to ensure that the LOBs operate in accordance with TMHCC International's strategic objectives. The main responsibilities of the EUMCs are to:

- review the LOB performance and monitor the actual performance against budget on a quarterly basis;
- regularly review exposure management across relevant lines of business, specifically ensuring that the exposures are in line with those agreed; and
- act as a discussion group for reviewing potential business opportunities.

The EUMCs escalate matters of concern, or which require approval of the Board through the relevant Chief Underwriting Officer and by way of a written report at regular quarterly Board meetings.

### **Investment Committee**

The primary purpose of this committee is to assist the Board by overseeing the management, understanding and quantification of investment (market) risk. The objectives of the Investment Committee are:

- ensuring that the funds of the Company are invested in accordance with its strategy and guidelines;
- monitor investment performance, including the performance of outside Investment Managers;
- ensuring the Investment Strategy and guidelines conforms, where applicable, with legal and regulatory requirements and that investment decisions take into account sustainability factors in accordance with the Prudent Person Principle;
- ensure that bases of valuations reported by the Investment Managers conform with legal and regulatory requirements;
- advise the TMHCC Group Investment Committee on any legal or regulatory constraints that would result in changes to the investment strategy and guidelines;
- where appropriate, and different to TMHCC Group guidelines, determine the level of investment in, and the maximum exposures to, individual investments;
- determine the setting of appropriate investment risk metrics to monitor the performance of investments and monitor, on a quarterly basis, the performance against the investment metrics;
- review cases where investments fall out of compliance with the guidelines and consider whether a waiver to the guidelines is appropriate for that investment; and
- take into account the potential long-term impact on the investment strategy and guidelines from sustainability risks, including environmental, social or governance events or conditions that, if they occurred, could cause an actual or a potential negative impact of the value of investments and liabilities.

### **Nomination Committee**

The main responsibilities of the Nominations Committee are to:

- review the structure, size and composition (including the skills, knowledge and experience) of the Board and make recommendations to the Board where their composition requires further development. In this respect, the Committee will consider the findings from the annual Board evaluation exercise;
- review the leadership needs of the Company, both executive and non-executive with a view to ensuring that it continues to compete effectively in the marketplace and assist in identifying, nominating, and re-nominating for the approval of the Board, candidates to fill Board vacancies as and when they arise; and
- consider succession planning for Directors and other senior executives, taking into account the challenges and opportunities facing the Company, and the skills and expertise needed on the Board in the future.

### **Remuneration Committee**

The Committee's primary objective is to oversee the remuneration arrangements for all employees within the Group including the Company, ensuring that the framework for remuneration is one that will enhance the Group's resources by attracting, retaining, and motivating employees within a framework that is aligned with the Group's risk management framework and long-term strategy and oversee the appropriateness of the Remuneration Policy, ensuring it complies with legislative and regulatory requirements.

## Risk, Capital & Compliance Committee

The purpose of the Risk, Capital & Compliance Committee is to assist the Board in its oversight of risk by undertaking the following: :

- review the effectiveness of the ERM Framework;
- review the risk strategy;
- review the risk appetite and risk profile in relation to capital, liquidity and operational risks;
- review the methodology used to determine HCCII's (Solo and group) capital requirements and stress testing;
- satisfy itself that HCCII's Economic Capital Model (ECM) is fit for purpose;
- review the adequacy and effectiveness of HCCII's system of non-financial internal controls and risk management;
- oversee the cyber security strategy;
- review the implementation and provide oversight of the data strategy;
- review and provide oversight of financial crime risk;
- monitor regulatory requirements; and
- oversight of the sub-committees which act as risk forums.

The Risk, Capital & Compliance Committee has six sub-committees/groups that each focus on a particular aspect of risk and report to the Risk, Capital & Compliance Committee with any recommendations and findings from the execution of their responsibilities. The main purpose(s) of each group are as follows:

- Capital Model Oversight Group: to monitor the Company's capital models, including output, use, development and validation. The model includes both the Internal ECM and the Standard Formula.
- Cyber Group: to review cyber underwriting risk exposure, monitor exposures against agreed risk appetites; oversee the development of Probable Maximum Loss methodologies; monitor industry developments and compliance with regulatory requirements in respect of cyber underwriting risk and as appropriate, recommend changes to risk appetites, cyber reporting, and scenarios/methodologies;
- Exposure Management Group: to monitor procedures and oversight systems for the evaluation of all property and non-property aggregate accumulations (both before and after Probable Maximum Loss) to be utilised by the regulated entities within the Group. The aggregate methodology will have reference to catastrophe models, Realistic Disaster Scenarios (RDS) and other relevant input;
- Operational Risk Group: to oversee and ensure the efficient and effective management of operational risk, including the identification and mitigation of operational risks; monitor established and emerging operational risks, and ensure appropriate procedures are in place. In addition, the Group oversees the prioritisation of actions taken in respect of potential risks based upon risk criteria approved by the Board; and
- Product Governance & Distribution Committee: to ensure effective oversight of product development, implementation and ongoing product management during the product lifecycle; that the Company can achieve compliance with its regulatory obligations, in particular, PRIN 2, 3, 6 and 7; proportionately; to promote and support the delivery of the six Treating Customers Fairly outcomes; ensure effective oversight of product development, implementation, and ongoing product management during the product lifecycle, and the delivery of good outcomes for its retail customers, which includes:
  - acting in good faith towards retail customers;
  - avoiding causing foreseeable harm to retail customers;
  - enabling and supporting retail customers to pursue their financial objectives;
  - offering products and services that are fit for purpose and designed to meet consumers' needs and are targeted at those consumers;
  - delivering products that offer fair value;
  - ensuring consumer understanding throughout the customer journey; and
  - providing appropriate consumer support such that the product can be used as reasonably anticipated.
- Data Executive Committee: to oversee the Company's Data Strategy and Data Governance Framework. The committee will provide direction for the establishment of Data Strategy that will focus on, modelling, quality, accessibility, value, usage, and innovation. The committee will also oversee the development and implementation of an appropriate and comprehensive Data Governance Framework including, policies, processes, systems, and practices for the Company that comply with the relevant UK and EU regulations.

## Sustainability Committee

The Committee was established to explore and oversee the Environmental, Social, and Governance (ESG) risks, trends, and opportunities that might impact the Company's business. The main responsibilities of the Committee are to:

- oversee the identification, management and mitigation of sustainability risks;

- define TMHCC International’s sustainability appetite, vision, objectives and strategy and recommend to the Board for approval;
- oversee the execution of the sustainability strategy;
- agree annual sustainability targets and review performance against targets; and
- oversight of the work carried out by sub-committees (Charity Committee, Workplace Group, and Climate Risk Committee).

### **Administration**

There is also an administrative committee with the authority to act on behalf of the Board between the quarterly scheduled Board meetings in order to deal with routine regulatory submissions, banking and administration matters, including the use of the Company Seal where Board level authorisation is required i.e., granting of Powers of Attorney.

### **Remuneration Policy**

The Company’s Remuneration Policy provides a framework for remuneration which is consistent with the Company’s risk management and long-term strategy. The key principles of the policy are to ensure that remuneration packages reflect the employees’ duties and responsibilities, that they are fair and equitable, and that reward is clearly and measurably linked to individual and corporate performance.

The pay element of the reward package comprises both fixed and variable pay. The fixed pay component is determined by the role and responsibilities of the employee, their skills and experience, performance, and comparable market rates. The variable pay component is designed to motivate and reward employees who generate income and/or increase shareholder value. The variable pay element is awarded in a manner which promotes sound risk management and does not induce excessive risk taking. The Remuneration Committee ensures that there is an appropriate balance between fixed and variable pay and that the fixed component represents a sufficiently high proportion of the total remuneration. In addition, the performance-based component reflects the risk underlying the achieved result, and a portion of the variable component is deferred for those employees who are identified as risk takers.

There is no remuneration linked to share options or shares in the Group or its ultimate parent undertaking.

### **Assessment of Adequacy of the System of Governance**

As noted in Section B.5, Internal Audit is responsible for evaluating the adequacy and effectiveness of the internal control system and other elements of governance, taking into account the nature, scale and complexity of the risks inherent in the business. Based on the audit and controls testing performed in 2021, and the governance review undertaken annually as part of Internal Audit’s Annual Opinion Statement, which considered governance, risk management and internal controls, the Company’s governance and risk management were both fit for purpose and the key controls continue to operate as intended.

## ***B2 – Fit and Proper Requirements***

### **Senior Managers and Certification Regime**

The Senior Managers and Certification Regime is designed to ensure individual accountability within firms, holding them more accountable for the decisions they make, and the remit has been extended to include more individuals within the firm who were not previously subject to the prior regulatory regimes.

Senior Manager Functions are controlled functions which have been designated as such by either the PRA or FCA. These functions apply to Directors that effectively run the Company and to Senior Managers who have responsibilities for the Key Functions as defined under the Solvency II Directive. Under section 59 of the Financial Services and Markets Act 2000 authorised firms are required to ensure that individuals seeking to perform one or more of the designated Senior Manager Functions gain pre-approval from the PRA/FCA to carry out the regulated activities.

The Certification Regime is a Financial Services and Markets Act 2000 requirement, and it applies to employees who are not Senior Managers but whose roles could allow them to cause significant harm to the Company or its customers. This regime includes all individuals who have been designated as a Material Risk Taker by HCCII and senior managers within key function areas of the business. These individuals must be notified to the PRA/FCA but do not require formal regulatory approval.

In addition to the Board and Committee structure outlined above the Company has six key functions as considered below. Of these, four are required by the Solvency II Directive and a further two are designated by the Board of the Company.



## Key Functions

The Company has identified six key functions which are as follows:

### Actuarial

The Actuarial function sits across all the underwriting platforms within TMHCC International. Its primary responsibility, from a Solvency II perspective, is the coordination of the calculation of the technical provisions, ensuring that methodologies and assumptions used are appropriate to the LOB, assess the sufficiency and quality of the data provided and compare best estimates against experience.

### Claims Management

The Company views its claims settlement process as the 'shop window' to customers and a potential differentiator to competitors. Staffed by claims professionals based in London, Barcelona, Paris, Brussels, Dusseldorf, Bridgend, Leicester and Amstelveen, handling claims emanating from all LOBs with claims potentially located in any jurisdiction anywhere around the world. The claims departments are responsible for evaluating loss exposures accurately and expediently, providing salvage and subrogation potentials for the organisation as well as providing a prompt, fair and consistent service to policyholders and agents.

### Compliance

The overarching purpose of this function is to enable the Company to meet and exceed the standards required by its regulators. Accountabilities include advising the Board on compliance with PRA/FCA, Lloyd's and international regulatory requirements, and ensuring staff awareness of regulatory matters and best practice guidelines for business compliance topics e.g. licensing, sanctions, anti-money laundering, competition and treating customers fairly.

### Internal Audit

The Internal Audit function is primarily responsible for evaluating the adequacy and effectiveness of the internal control system and other elements of governance. This function is independent and free to express its opinions and disclose findings to the Board, TMHCC Group and reports directly to the UK Internal Audit Committee and into the TMHCC Group Audit Committee on a regular basis.

### Risk Management

The risk management function assists in the effective operation of our business units and maintains an entity-wide view of the Company and the entire Group risk profile. For the Board, committees and management it also monitors and provides focused reporting on risk exposures and advises on risk.

### Information Technology (IT)

The standard of our control framework is heavily reliant upon IT from data input through to regulatory reporting. The accuracy and timely provision of various management information is essential for the Executive decision-making process. In some LOBs direct portal access is provided to our customer base and therefore high standards for service reliability are imperative to the business and our reputation.

## Fit and Proper Compliance

The Company's Fit and Proper Policy provides a framework for assessing the fitness and propriety of Directors, Senior Managers and individuals performing a key function as defined under the Solvency II regime and individuals performing certified functions as defined under Senior Managers and Certification Regime. The key principles of the policy are to ensure that all individuals have the personal characteristics and possess the level of competence, knowledge and experience, including ongoing training, to enable the individual to perform their responsibilities effectively which ultimately enables sound and prudent management of the Company.

The control framework for assessing the fitness and the propriety of individuals who effectively run the Company or have other defined functions starts at recruitment and continues throughout employment with performance reviews, development plans and periodic reassessments which include self-certification and independent screening by a third-party provider.

The assessment for the pre-appointment stage is carried out by the Human Resource department and the person's proposed manager in the Company. Where the appointment is to a Board position, the proposed appointee is also interviewed by one or more non-executive Directors. The assessment will take account of the qualifications, knowledge and experience of the individual.

The ongoing assessments of the suitability are carried out through our Performance Management Programme which is the responsibility of individuals and their line managers but is also monitored by the Human Resource department and reported as part of our key risk metrics to oversight committees and Board. A programme of training is in place for individuals' to either enhance or maintain level of knowledge as appropriate. Training is monitored by the Compliance department to ensure the annual programme

covers all legal and regulatory topics relevant to the individual's area of responsibility. The Company Secretary coordinates the general training needs of the Board members, and these may include general governance issues or technical matters.

## ***B3 – Risk Management System including the Own Risk and Solvency Assessment***

### **Risk Management Strategy and Objectives**

The Company believes that a strong, effective and embedded risk management framework is crucial to maintaining successful business operations and delivering sustainable, long-term profitability. The Company achieves this through a strong risk culture articulated by effective ERM senior leadership and embodied by management at all levels through its governance structure and risk management processes.

The following risk management principles are high level guidelines which have been derived from experience, best practice and corporate governance guidelines used within the insurance industry and these specific principles have been adopted by the Directors of the Company.

1. **Systematic and structured risk management**  
The control processes should include recognised systematic activities, where practicable, that ensure financial results are reliable, robust and comparable, thereby allowing management to adopt them with confidence. These processes should reflect best practice and be supported by the appropriate tools and techniques.
2. **Evidenced-based risk management**  
The inputs to the process should be based on historical data (where available), experience, subject knowledge, expert judgement and future projections. To this end, lessons-learned workshops should be conducted at the end of projects or newly completed first time activities with information being stored for similar future events.
3. **Human factors**  
Human behaviour such as bias, motivation, 'rule of thumb', unwillingness to accept risk or change will all influence the effectiveness of control practices. Management should take account of these behaviours during the design and implementation stages of control practices. Additionally, consideration should be given to problems of communication due to organisational structure and geographical dispersion.
4. **Adding benefit and value**  
The optimisation of risk management practices and risk response planning should contribute to the demonstrable achievement of business objectives and provide overall organisational benefits, such as efficiency in operations, financial performance, accurate reporting, regulatory compliance and good reputation. To add value, the control environment should underpin our corporate governance structure, provide assurance to the Group and reflect legislative regulatory requirements.

The Company's strategic risk objectives are:

- To build and maintain a diversified and non-correlating portfolio of business that achieves a return of 10% above risk free rate over the insurance cycle.
- To maintain a focus on preserving loss ratio before premium volume and will only plan to grow where we see a possibility for improved rating and conditions and target returns are met.
- To preserve capital using risk mitigation as a key component in ensuring that all risks are identified and monitored.
- We aim for a minimum threshold for credit rating of an A rating (from S&P, Moody's and Fitch).
- Throughout all our dealings, we will ensure that the reputation and integrity of the company remains intact so that we are seen as the premier specialty insurer.
- Staff retention is of paramount importance to the Company; we set our pay structure in line with market rates and provide a good benefits package. In addition, appraisals and training are focused on improving and developing our people.

The Directors believe that the benefits of good risk management (and the downside of bad risk management) will be felt by our staff, management, shareholders and customers alike. Whilst the overall responsibility for effective governance and risk management lies with the Board, the daily management of risk is delegated to senior management as the diversity of risks faced by the business apply at all levels of our organisation and to all activities.

The Company's strategy for managing its risk is to:

- Adopt an integrated approach to risk management through the processes and structures detailed in the Risk Strategy & Risk Management Policy.
- Accept that whilst the business operation cannot be risk free, we will aim to manage risk to a desired level and minimise the adverse effects of any residual risk.

- Coordinate the management of risk via the Risk, Capital & Compliance Committee and other committees that report to the Board.
- Manage risk as part of normal line management responsibilities and provide funding to address 'risk' issues as part of the normal business planning process.
- Ensure that there are appropriate policies and procedures in place that are communicated to and followed by managers and staff to minimise risk.
- Ensure that staff are appropriately trained.

### Risk Management and Control

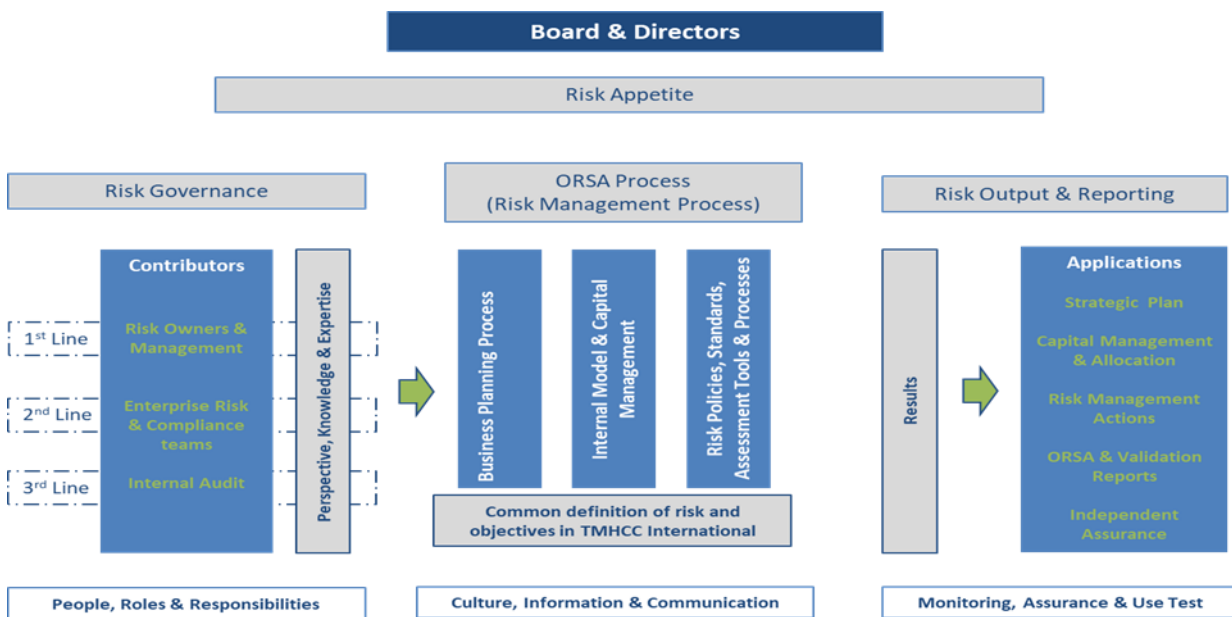
The Company operates a 'three lines of defence' risk governance framework which means that we coordinate risk holistically ensuring that all types of risk are prioritised and analysed both in absolute and relative terms.

The first line of defence is the responsibility of senior management, the risk takers in the business. This involves day-to-day risk management, in accordance with risk policies, appetite and internal controls at the operational level.

The second line of defence concerns those responsible for risk oversight and risk guidance. As well as monitoring reports, they are responsible for risk policies, risk processes and control design.

The third line of defence is independent assurance to the Board and senior management of the effectiveness of risk management processes.

The diagram below illustrates the various facets of our risk framework; how these interact with one another and the responsibilities of those staff in the first, second and third line of defence.



The Risk Management function assists in the effective operation of our business units and maintains an entity-wide view of each entity and the Company's risk profile. For the Board, committees and management it also monitors and provides focused reporting on risk exposures and advises on risk.

#### Risk Identification

The Company's approach to risk identification uses various methods of self-assessment specifically capitalising on our internal expertise to identify and quantify risks with departmental results being consolidated and standardised as necessary for the Risk, Capital & Compliance Committee.

Senior Managers know their business objectives and are best placed to be able to highlight any new risks that may be developing over time or changes in existing risk levels. It is part of their overall responsibility to ensure such situations are reported upwards either through the Enterprise Risk team or directly to the Risk, Capital & Compliance Committee.

### **Risk Register**

The Company has a risk register which ensures all identified risks are described in a consistent and structured format to facilitate the assessment process. The register is divided into high level risk categories which assist with transparency and clarity when analysing risks at a company level rather than departmental. The grouping of risks helps the Enterprise Risk team to aggregate and map similar kinds of risk across departments, document management responsibilities both for the ownership of risk and the mitigation activities to control said risk.

The risk register is reviewed in its entirety with relevant risk and control owners, by the Enterprise Risk team on a quarterly basis.

### **Risk Policies**

The Company has defined a risk policy for each risk group which impacts our operating environment and establishes the controls, procedures, limits and escalation to ensure that the risks are managed in line with Risk Appetite. The policies cover Strategic Risk, Insurance Risk, Operational Risk, Group Risk, Internal Financial Risk, Liquidity Risk, Credit Risk and Market Risk.

The policies are reviewed annually alongside the group strategy and planning process thereby confirming that the risk appetite and profile remains appropriate to deliver the company's objectives in light of both internal and external drivers or constraints.

### **Risk Appetite, Tolerances and Limits**

Risk appetite plays an important part in supporting risk assessment, monitoring and control activities as it establishes a set of benchmarks from which transaction specific tolerance levels can be set and monitored for a particular risk.

The Company accepts the immediate parent's risk appetite with regards to Strategic and Insurance risks but on occasion may reduce the specific appetite for a particular LOB as a prudent move against negative market conditions and influences. This form of limitation would be managed via amended business plans, reduction in underwriting authorities and regularly monitored via the Executive Committee.

The Risk, Capital & Compliance Committee enforces the Board policies by ensuring that measurable limits or thresholds are allocated and assists the organisation to implement control procedures and appropriate monitoring activities as well as providing an escalation route to the Board if required.

- A limit reflects the absolute maximum level of exposure that is acceptable for a particular risk (a level of exposure that should not normally be exceeded).
- In contrast a threshold represents a level of exposure which, with appropriate approvals, can be exceeded, but which, when exceeded, will trigger some form of response (e.g. additional expenditure of risk control, reporting the situation to senior management, etc.).

The Company's Strategic Risk metrics are set with thresholds. Strategic Risk Metrics are prepared and reported to the Risk, Capital & Compliance Committee and Board of Directors on a quarterly basis.

### **Risk Monitoring and Review**

The Company operates in a dynamic environment which brings constant change. To provide an effective risk management framework the Company maintains a continual monitoring and review structure to ensure that risks are effectively identified and assessed, and that appropriate controls and responses are in place.

The internal reporting requirements and timetables for month-end and quarterly results are mapped to the risk governance structure in that monitoring the business efficiently is paramount to managing the most significant risks. Other regular soft management information is also used as a risk monitoring tool, such as regular management reports from HR, IT and Compliance.

The Enterprise Risk team maintains the risk management framework which includes regular data accuracy reporting and assessments of operational near misses and losses. Quarterly reviews of the live risk register and emerging risk register are also performed with relevant risk and control owners. Stress testing, including reverse stress tests and scenario analysis is performed periodically to assess the robustness of the risk and capital management framework and solvency requirements with results reviewed and approved by the Risk, Capital & Compliance Committee and Board of Directors respectively. The detailed results are also included in the annual ORSA Report.

In addition, regular audits of policy, procedures and compliance standards are carried out by the Internal Audit function and on occasion specific subject focused compliance reviews are conducted by the compliance team. This type of monitoring not only manages risks but is more attuned to identifying further opportunities for improvements or increasing best practice thresholds.

The monitoring process must provide assurance that there are appropriate controls in place covering all the company's activities and that the procedures are understood and followed. Consequently, management information in varying degrees of detail is reviewed

by Business Unit leaders, Line of Business underwriters, Enterprise Risk, Executive Management and ultimately the Board of Directors. Such reviews provide the appropriate escalation of issues to the next level or potentially direct routed to the Directors if deemed appropriate.

## Stress and Scenario Testing

As part of the overall process of risk control and in consideration of business strategy and capital setting, various risks are considered by the business. These risks broadly fall into three areas:

- Risk of ruin, considered via reverse stress tests.
- Risk of multiple events on the business model and strategy considered via stress and scenario tests.
- Emerging risks that are considered potential risks to the business model and strategy.

The work completed in this area is key to ensuring the full range and impact of risks, both current and potential, are understood and represented in the capital model and risk register.

The Company also makes use of stress and scenario testing for both the capital and liquidity implications of certain risks under the Internal Model.

- Internal Model Calibration: the results of stress and scenario testing are key calibration inputs for Catastrophe Risk and Operational Risk. A representative set of scenarios are designed, and the results are used as calibration points for the model.
- Internal Model Validation: stress and scenario testing is used to independently validate the Internal Model.
- Business Plan Review: the Company stress tests the forecasts to understand various scenarios on both profitability and future capital positions.
- Reverse stress testing: the Company performs annual reverse stress testing exercises to identify and assess events and circumstances that would cause the Company's business model to become unviable.

Some further details of the stress testing programme and outcomes is shown later in this report under Risk Section C6.

## Solvency Capital Management

The Company calculates its regulatory capital requirements using the Standard Formula. Calculation of the Standard Formula SCR is the responsibility of the Finance team, with assistance from the Actuarial team, and occurs at mid-year, as an input to the planning process during the fourth quarter, and year-end. The results are reported into the Capital Management Oversight Group and evaluated alongside the Company's Internal Model. Additionally, the solvency results are reported quarterly to the Board by the Chief Financial Officer.

Since the Internal Model provides a more tailored view of the Company's risk profile compared to the Standard Formula, the Internal Model output is used to monitor the Company's view of risk. However, there are no risk categories in our risk register where the risk is not identified in the Standard Formula.

## Own Risk and Solvency Assessment

The Company has adopted a working definition of the ORSA to be "the entirety of the processes and procedures employed to identify, assess, control and report the short- and longer-term risks faced by the business and to determine the assets necessary to ensure that the overall capital needs (solvency and economic) are met at all times".

The ORSA considers risk, capital performance and strategy. It relies on the contribution of existing business processes and the monitoring tools of the risk management framework to provide Executive Management with adequate and accurate information enabling the taking of key decisions regarding the overall risk and capital profile of the business.

The live risk registers provide the executive management team, and the Board, with a view of the risk profile on a regular basis, affording early opportunities to take management action if the current profile is diverging from the business strategy.

This information, along with other outputs of the risk management framework, e.g. risk appetite metrics, are included in a quarterly ORSA update report. This report also includes financial information, which is also considered in the context of the stated business strategy.

The ORSA is an overarching process, the underlying elements of which are fully embedded within the organisation. Consequently, the ORSA has many stakeholders across the business and the table below highlights the responsibilities with regards to the ORSA for each function.

Stakeholder	Selected Responsibilities
Board	<ul style="list-style-type: none"> <li>Review and approve the ORSA Policy</li> <li>Review and approve the ORSA report on an annual basis which constitutes the formal ORSA sign-off</li> <li>Setting the overall business strategy and direction</li> <li>Setting risk appetite for the business</li> </ul>
Risk, Capital & Compliance Committee	The TMHCC International Boards delegate risk management oversight and monitoring activities to this committee. The committee is the primary forum for challenging both the ORSA content and process, in order to recommend approval of the ORSA Policy and ORSA Report to the Boards. Quarterly ORSA update reports are also reviewed by the committee.
Executive	<ul style="list-style-type: none"> <li>Engendering a positive risk culture</li> <li>Ensure appropriate governance, committee structure and escalation procedures such that risks can be monitored and managed</li> <li>Agree future plans for the LOBs based on current strategy and outputs from ORSA processes</li> <li>Engage on stress tests, reverse stress tests and emerging risks</li> </ul>
Enterprise Risk Function	<ul style="list-style-type: none"> <li>Producing the annual ORSA Report and collating the activities to sign-off</li> <li>Producing the quarterly ORSA reports</li> <li>Setting risk policies consistent with risk appetite</li> <li>Translating risk appetite into more granular tolerance and risk limits</li> <li>Working with business owners to develop appropriate risk reporting</li> <li>Ensuring consistency between risk identification, measurement and reporting</li> <li>Managing scenario testing and reverse stress testing framework</li> <li>Translating risk appetite into more granular tolerance and risk limits</li> <li>Preparation and monitoring of risk metrics</li> <li>Measuring and monitoring the risk culture within the business</li> <li>Ensuring the documentation of all the underlying processes which support the ORSA</li> </ul>
Actuarial Function	<ul style="list-style-type: none"> <li>Developing tools to ensure appropriate risk measurement and monitoring including where necessary 'lite models' such as replicating portfolios and curve fitting</li> <li>Assisting with the stress and scenario analyses</li> <li>Carry out financial projections to better understand the risk drivers during the business planning horizon</li> <li>Developing, parameterising and running the Economic Capital Model ECM</li> <li>Comparisons of SCR to the internally generated ECM</li> </ul>
Finance Function	<ul style="list-style-type: none"> <li>Prepare annual budgets and monitor against actual performance</li> <li>Calculate the capital held and monitor solvency</li> <li>Implement the capital strategy</li> <li>Develop and maintain the capital contingency plan</li> </ul>
External Consultant / Internal Audit	<ul style="list-style-type: none"> <li>Provide benchmarking and independent review</li> <li>Ensure that there is an appropriate control framework in place</li> <li>Provide assurance regarding the underlying processes</li> </ul>

## ORSA Report

The ORSA Report is used to summarise the outputs of the risk management and capital assessment processes. This report includes both the quantitative and the qualitative outputs of the processes and links these to the Company's business performance, to assist the Board and senior management in making strategic business decisions.

The Enterprise Risk team prepares the ORSA Report annually which is reviewed, challenged and signed off by the Board. The annual ORSA Report is made available to key stakeholders and the regulators and sections are also included within this report, where considered appropriate. In addition, an ORSA Lite may be produced in cases where an event occurs that results in a material change to the Company's risk profile.

On a quarterly basis, entity specific ORSA update reports are produced for the Risk, Capital & Compliance Committee and the Board, which summarise the key metrics from the annual report and provide commentary on the results from a risk perspective.

## ***B4 – Internal Control System***

The Internal Control System is designed to provide reasonable assurance that the Company's financial reporting is reliable, is compliant with applicable laws and regulations and its operations are effectively controlled. The Board is ultimately responsible for overseeing and maintaining the adequacy and effectiveness of the internal control systems and delegates control and oversight to the Audit Committee and key functions, including Internal Audit and Compliance.

### **Internal Audit assurance**

The control environment includes policies, procedures and operational systems and processes in place. The Internal Audit annual plan provides assurance over the internal control environment. This plan is approved by the Audit Committee on an annual basis and the findings are presented to the Audit Committee and management through Internal Audit reports which include an overall assurance rating and audit memos which are used for reporting on system changes, hot topic subject matters etc. In addition to this risk-based Internal Audit programme, the Internal Audit team conducts JSOX and internal controls tests on behalf of management. A total of 222 controls (110 business controls and 112 IT controls) across 10 key cycles were tested for 2023. The testing was divided into two phases during the year. The overall business process results of the 2023 controls testing continued to be positive, in line with previous years, with only three JSOX testing failures identified related to the business controls and three testing failures for the IT JSOX controls.

### **Compliance Function**

The Compliance function identifies monitors and reports the compliance risk exposure for the Company. The key responsibilities of the Compliance function are to:

- identify and evaluate legal and regulatory risks covering TMHCC International's current and proposed business activities;
- advise and train staff on the applicable laws and regulations, ensuring that they are apprised of all developments in these areas;
- produce documented guidelines covering compliance with these laws and regulations and assess adherence to these internal policies and procedures through the undertaking of regular compliance monitoring assessments;
- act as an adviser in compliance matters within the organisation;
- investigate and follow-up potential violations of the laws and regulations; and
- record any incident that must be reported and ensure that each legal entity fulfils its obligation as regards notification to regulators or other relevant third parties.

Compliance policies and procedures are maintained on the TMHCC International policy & procedure portal which is accessible to all employees via the Company intranet.

The Compliance Policy defines responsibilities, competencies and reporting duties of the Compliance function; it is reviewed on an annual basis and there were no significant changes to the policy during this reporting period.

The Compliance Plan sets out the planned activities of the Compliance function over the forthcoming period taking into account the Company's exposure to compliance risk in all areas of activity. It should be noted that, as per the 2023 Compliance Plan, key amongst activities performed was a project to ensure compliance with the FCA's Consumer Duty and the delivery of good customer outcomes which is directly aligned with the firm's 'Good Company' ethos.

The Head of International Compliance reports directly to the Chief Risk Officer who is a member of the Board.

## ***B5 – Internal Audit Function***

The Internal Audit function is primarily responsible for evaluating the adequacy and effectiveness of the internal control system and other elements of governance. This function is independent and free to express its opinions and disclose findings to the Board, TMHCC Group and reports directly to the UK Internal Audit Committee and into the TMHCC Group Audit Committee on a regular basis.

Within the context of the control framework, auditing is an independent risk assessment function established within the organisation to evaluate, test and report on the adequacy and effectiveness of the management's systems of internal control, providing the third line of defence. The purpose of the evaluation and tests is to:

- assist the Audit Committee in executing their oversight responsibilities;
- provides an independent assessment of the branch's system of internal control, through reviewing how effectively key risks are being managed; and
- assists management in its responsibilities by making recommendations for improvement.

The Head of International Internal Audit for Company is responsible for implementing and maintaining an effective and efficient audit programme, taking into account the Company's system of governance and risk management processes.



## Audit Charter

As required by the Institute of Internal Auditors (IIA), the Internal Audit department has in place an Audit Charter which is approved by the TMHCC Group Audit Committee in Houston. This charter sets out the purpose, mission and responsibility for the Internal Audit activity based on the power and authorities handed to it by the TMHCC Group Audit Committee. This ensures that the Internal Audit department has access to all offices, documents and staff it requires to conduct its Internal Audit work without any interference or obstruction.

## Audit Independence

For the International operations, the Head of International Internal Audit reports functionally to the TMHCC Corporate Senior Vice President of Internal Audit & Controls, who is based in the Houston head office, and administratively to the TMHCC International Group Chief Risk Officer, who is based in the London office. The reporting line into the Group Chief Risk Officer allows internal audit to be kept up to date with changes and developments within the international operations. The Head of International Internal Audit also attends the UK Audit Committee meetings on at least a quarterly basis to report audit results and findings. There is also direct communication between the Chair of the UK Audit Committee and the Head of International Internal Audit during the year. In addition to this, the UK Audit Committee Chair also verifies on an annual basis the independence of the Head of International Internal Audit.

The work of the Internal Audit department is subject to a full audit which is undertaken by an independent third party every five years and a review was performed by KPMG in 2023. This corporate wide review of TMHCC received a Generally Conforms rating, the highest of three ratings available and KPMG determined that the IIA standards were being achieved. Furthermore, internal auditors that work in the department do not have direct responsibility over, or responsibility for, any of the activities being reviewed. Any new employee of the audit department that has previously worked in another area of the organisation will be prohibited from reviewing the activities that they were once responsible for, for a minimum of one year.

## B6 – Actuarial Function

The Actuarial function supports all the underwriting platforms within TMHCC International. Its primary responsibility is the coordination of the calculation of the technical provisions, ensuring that methodologies and assumptions used are appropriate to the LOB, assessing the sufficiency and quality of the data provided and comparing best estimates against experience. The Actuarial function is also responsible for developing, parameterising and calculating the outputs of all Economic Capital Models for TMHCC International. In addition, the function assists in the calculation of the Standard Formula Capital Requirement and in the pricing of products sold by the Group's insurance provider, HCCII (the Company).

In forming and formulating its actuarial view, the actuarial function is objective and free from influence of other functions and management. The department is operationally independent and provides its opinions in an independent fashion, adhering to professional and regulatory standards and fit and proper guidelines.

## B7 – Outsourcing

In order to conduct its operational functions as effectively and efficiently as possible the Company may, as appropriate, find it necessary to outsource certain activities. Given that an outsourcing arrangement results in a shift from direct to indirect operational control of an activity it will always change the Company's risk profile and the risk management system must reflect this.

The Company seeks to manage the severity and frequency of identifiable risks by:

- (1) ensuring an effective supplier selection process incorporating due diligence procedures; and
- (2) making certain that the arrangement is formally structured through:
  - the effective management of transition risk;
  - monitoring and review within the regulatory framework;
  - ensuring that a signed contractual agreement is in place which includes an agreed service level and whilst not an exhaustive list, covers inspection rights and confidentiality;
  - viable contingency plans including ensuring that a termination/exit strategy is in place; and
  - retaining control over any valuable confidential information which is owned by the Group and may be shared and used by a third party by having a standard non-disclosure agreement in place.

In achieving this the Company aims to avoid impairing the quality of the system of governance, unduly increasing operational risk, impairing the ability of the Company to supervise, and undermining the service to policyholders.

Strong governance and management oversight combined with assurance from the outsourcer via management information are deemed to be essential controls when managing the outsourcer relationship.



Key third party outsourcing providers are summarised below:

Outsourcing Provider	Outsourced Function	Location of service provider
Ins-sure Holdings Limited	Policy administration	UK
Xchanging Claims Services Limited	Policy administration	UK
New England Asset Management Inc.	Asset Management	USA & EU
PwC	Payroll Processing UK and Europe	UK & EU
Box	Data Hosting	USA, UK & EU
Vertafore	Policy administration	USA
Verisk	Policy administration	UK
Microsoft Enterprise Agreement	Data Hosting	UK & Switzerland
DXC	Policy administration	UK
Global Switch	Data Hosting	UK
Coforge	IT support	UK & India
NTT	IT support	UK & India
ACORE Capital	Real Estate Investment management	USA

### ***B8 – Any Other Information***

There is no additional information that requires disclosure.

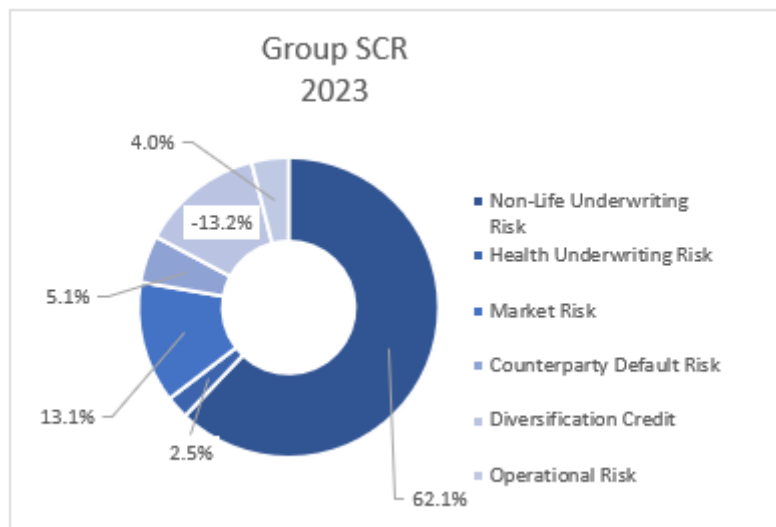
## Section C – Risk Profile

The Group has identified the risks arising from its activities and has established policies and procedures to manage these risks in accordance with its risk appetite. The Company maintains a risk register and categorises its risks into six areas: Insurance, Strategic, Regulatory and Group, Market, Operational, Credit and Liquidity. The sections below define each category of risk and outline the Group's risk profile & risk concentration (where relevant), risk appetite and how it manages/mitigates each category. The Strategic, Regulatory and Group risks are covered in Section C6. The section concludes with details of the identified largest risks from the Risk Register, results from the most recent annual 'Stress & Scenario' exercise and emerging risks.

It is not anticipated that there will be any material risk exposure changes over the three-year planning cycle.

As at 31 December 2023, HCCII and TME are the two underwriting entities within the Group and other related companies are either holding companies in nature or of such size that they do not present material risks to the Group.

The chart below indicates the relative magnitude of the risks, as calculated within the Standard Formula SCR, as at 31 December 2023.



This section considers the identified risk categories separately. However, how these individual categories accumulate for the business is as important, if not more so. This brings in the concept of a dependency or correlation structure. For the Group, these are considered using stress and scenario tests, where multiple risk categories are assumed to be impacted at one time. In addition, understanding has been built up when parameterising the dependency structures underlying HCCII's capital model. These dependency structures have been derived from a variety of sources, including discussions with the business and executive management, obtaining benchmark information from external sources, such as actuarial consultants and investment managers, further use of stress and scenario tests. We also use this knowledge to review the dependency structure underlying the SCR calculations.

### C1 – Underwriting (Insurance) Risk

The Group's insurance business assumes the risk of loss from persons or organisations that are themselves directly exposed to an underlying loss. Insurance risk arises from this risk transfer due to inherent uncertainties about the occurrence, amount and timing of insurance liabilities. The four key components of insurance risk are premium or future underwriting risk (including delegated authorities), reinsurance purchasing, claims management and reserving. Each element is considered below.

## Premium Risk

### Nature of the Risk

Premium risk relates to the potential losses arising from inadequate future underwriting. There are four elements that apply to all insurance products offered by the Group:

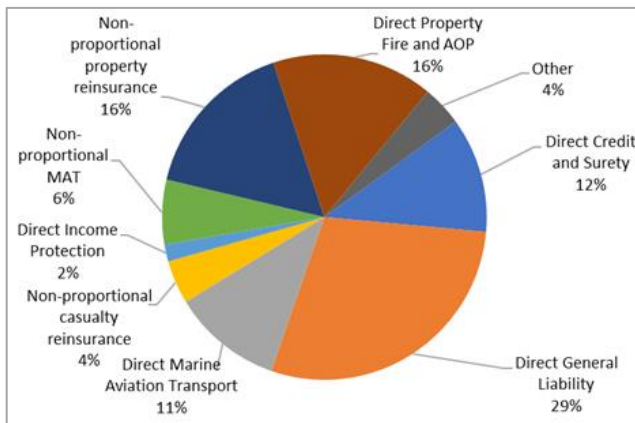
- Cycle risk – the risk that business is written without full knowledge as to the (in)adequacy of rates, terms and conditions;
- Event risk – the risk that individual risk losses or catastrophes lead to claims that are higher than anticipated in plans and pricing;
- Pricing risk – the risk that the level of expected loss is understated in the pricing process;
- Expense risk – the risk that the allowance for expenses and inflation in pricing is inadequate.

### Risk Profile & Concentration of the Risk

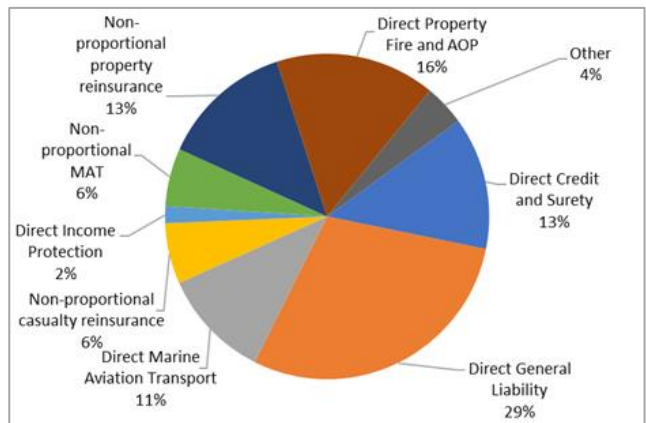
The charts below show 2024 budgeted GWP broken down into Solvency II LOB, versus 2023 actual premiums.

#### Group

##### 2024 Budget GWP

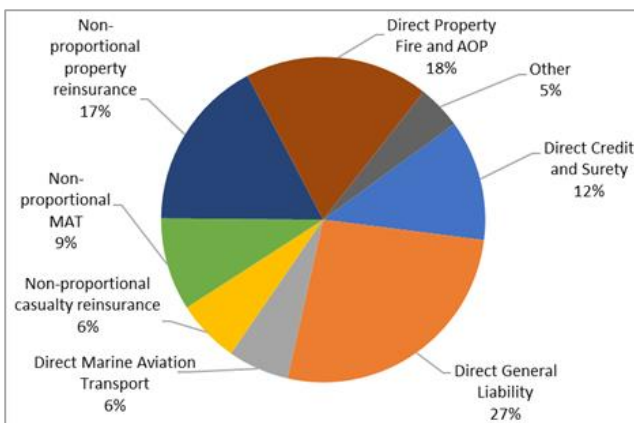


##### 2023 Actual GWP

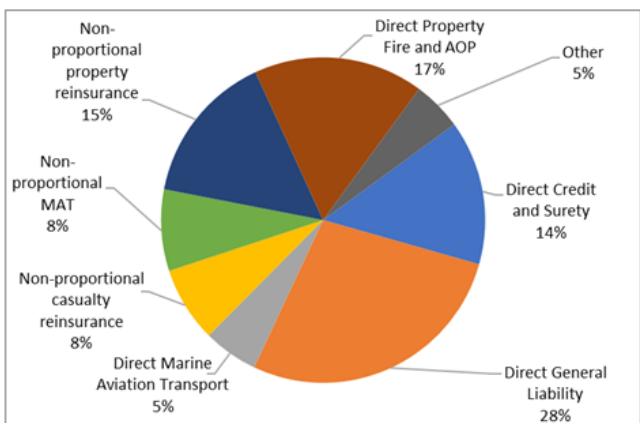


#### Company

##### 2024 Budget GWP



##### 2023 Actual GWP



The charts above highlight concentrations of risk across the LOBs and the broadly similar split across classes between 2024 Budget and 2023 Actual figures for both Group and Company. The variance between the Group and the Company figures relates to TME, with further details shown in the TME SFCR.

The table below indicates the concentration of exposure to natural catastrophes. The 2024 budget for both Group and Company shows slightly increased catastrophe exposures compared to 2023 actuals. The variance between the Group and the Company figures relates to TME, with further details shown in the TME SFCR.

Catastrophe/Non-Catastrophe Split	Proportion of GWP			
	Group		Company	
	2024 Budget	2023 Actual	2024 Budget	2023 Actual
Catastrophe business	30.3%	27.2%	33.2%	31.3%
Non-Catastrophe business	69.7%	72.8%	66.8%	68.7%

The concentration by geographic region is shown in Section A.

### Managing & Mitigating the Risk

The Group manages and models the four elements of premium risk in the following three categories: attritional claims, large claims and catastrophe events.

The Group's underwriting strategy is to seek a diverse and balanced portfolio of risks in order to limit the variability of outcomes. This is achieved by accepting a spread of business over time, segmented between different products, geographies and sizes.

To manage underwriting exposures, the Group has developed limits of authority and business plans which are binding upon all staff authorised to underwrite and are specific to underwriters, classes of business and industry.

These authority limits are enforced through a comprehensive sign-off process for underwriting transactions including an escalation process for all risks exceeding individual underwriters' authority limits. Exception reports are also run regularly to monitor compliance and a rigorous peer and external review process is in place.

Rate monitoring, including risk adjusted rate change and adequacy against benchmark rates are recorded and reported.

The annual corporate budgeting process comprises a three-year Plan which incorporates the Group's underwriting strategy by LOB and sets out the classes of business, the territories and the industry sectors in which business is to be written. The Plan is approved by the Directors and actual performance against budget is monitored by the underwriting committees on a monthly basis.

Underwriters calculate premiums for risks written based on a range of criteria tailored specifically to each individual risk. These factors include, but are not limited to, the financial exposure, loss history, risk characteristics, limits, deductibles, terms and conditions and acquisition expenses using rating and other models.

Reinsurance is one of the major risk mitigants used to protect the Group and the Company balance sheets. Whilst gross line size is limited to ensure there is a reasonable balance between gross line size and premium and shareholder equity/net assets, our potential retentions, especially on the catastrophe exposed business, are managed closely and reinsurance is used to control net exposures. Further details may be found under 'Reinsurance Risk' below.

The Group also recognises that insurance events are, by their nature, random and the actual number and size of events during any one year may vary from those estimated using established statistical techniques.

To address this, the Group sets out its risk appetite (expressed as PML estimates and modelled return period events) in certain territories as well as a range of events such as natural catastrophes and specific scenarios which may result in large industry losses. The aggregate position and modelled loss scenarios are monitored at the time of underwriting a risk and reports are regularly produced to highlight the key aggregations to which the Group is exposed.

One of the largest types of event exposure relates to natural catastrophe events such as windstorm or earthquake. Where possible, the Group measures geographic accumulations and uses its knowledge of the business, historical loss behaviour and commercial catastrophe modelling software to assess the expected range of losses at different return periods. Upon application of the reinsurance coverage purchased, the key gross and net exposures are calculated based on extreme events at a range of return periods.

The Group uses a number of modelling tools to monitor its exposures against the agreed risk appetite set and to simulate catastrophe losses in order to measure the effectiveness of its reinsurance programmes. Stress and scenario tests are also run using these models (see separate 'Stress & Scenario' Section below).

Risk appetites are monitored by the Risk, Capital & Compliance Committee and Board on a quarterly basis and include for this risk: premium volumes and rate change, probability of underwriting losses, diversity of the business being written, gross lines sizes, exposure to catastrophes (both natural catastrophes and others).

## Reinsurance Risk

### Nature of the Risk

Reinsurance risk arises where reinsurance contracts:

- Do not perform as anticipated;
- Result in coverage disputes; or
- Prove inadequate in terms of the vertical or horizontal limits purchased.

Failure of a reinsurer to pay a valid claim is considered a credit risk which is detailed in the credit risk section.

### Managing & Mitigating the Risk

Reinsurance is one of the most important risk mitigation tools used by the Company to mitigate risk within each of its regulated legal Entities. It also represents the key 'Future Management Action' within HCCII's Solvency II framework.

The Company has an overall Business Strategy of which reinsurance purchasing plays a key part. The Reinsurance Strategy therefore represents an extension of the Business Strategy and is closely linked to the overall strategy execution.

The foundation of the Company Reinsurance Strategy is the individual limit profiles of the LOBs and risk tolerances for net individual risks and accumulation of risk losses from one individual event. Reinsurance needs to be utilised when we maintain limit profiles that exceed our net risk tolerances. In setting risks tolerances, we consider the overall Group tolerances.

Linked to these Group tolerances and the Company Business Strategy, the Company has in place a number of Board level risk appetite statements that control the risks taken by the individual business lines, regulated legal entities and HCCII.

The bedrock of the Group and the Company strategy is to target an underwriting profit equivalent to at least a 10% return above the risk-free rate over the insurance cycle. Each LOB has this same target albeit some consideration is given to longer tail lines or lines that achieve this return at the margin. This target may also vary by entity depending on the mix of business.

The Company employs various mechanisms to follow the underwriting strategy and control gross and net underwriting exposure risk. In areas of exposure to natural catastrophic perils, underwriting is very selective and control over gross aggregation and then ensuring adequate reinsurance protection is key. In other areas, the balance of volume, gross line size and net retentions are the largest drivers.

The Reinsurance Strategy of the Company is designed to manage risk and protect the result of each LOB from excessive volatility and reinsurance is therefore purchased at a LOB level but covering all legal Entities. From an individual entity perspective reinsurance is used to ensure reduced result volatility and capital preservation.

For the catastrophe exposed business, the key to the reinsurance purchasing is to obtain the correct balance of vertical coverage but ensuring a net retention that allows good portfolio balance. In respect of the more attritional LOBs, the key to the purchasing is to ensure a balanced portfolio by protecting the net retention and ensuring the cover to multiple potential individual losses is adequate.

Excess of loss reinsurance is used as the basis of most of the core programmes of the key LOBs however quota share reinsurance is used where line size to premium volume is not as well balanced or there is the potential for a series of losses or a significant number of losses stemming from one individual event. Stop loss cover may also be purchased if the price is considered appropriate.

Risk attaching reinsurance is used where it is considered that risks have a longer duration with no provision to shorten the tail, loss occurring protection is used for the shorter tail businesses such as property.

Facultative reinsurance for individual risks can be purchased to improve risk selection or to reinsure specific elements of a risk that do not fit into the overall underwriting strategy. This facultative reinsurance is purchased both for the benefit of our reinsurers and for the benefit of our net retention, depending on the structure and circumstances.

For any cover purchase, the amount of cover should be commensurate with meeting the underwriting risk appetite statements. Considerations will include, but not necessarily be limited to, the proportion of risk ceded, retention levels, number and cost of reinstatements and aggregate limits. The Executive Underwriting Management Committee will review the cost benefit of price verses coverage, using the output from various TMHCC International capital models.

An annual reinsurance purchase plan is included within the annual business plan for each LOB detailing the proposed reinsurance protections by class. This reinsurance purchase plan is reviewed and approved by the Executive Underwriting Management Committee for each LOB and by the relevant Board for each entity to ensure that risk appetite tolerances are maintained.

The expectation is that reinsurance is purchased to adequately protect the balance sheet in the event of a significant market event, a potential individual large risk loss or systemic losses caused by a single event. When purchasing reinsurance, the various risk appetites are measured and managed at both an overall organisation and a legal Entity level, including vertical protection, retentions versus annual aggregate losses (for catastrophe exposed lines), retentions versus LOB maximum line size (for attritional lines), net exposure to catastrophe losses, exposure to reinsurance credit losses and exposure to individual reinsurers.

## Claims Management Risk

### Nature of the Risk

Claims management risk may arise within the Group in the event of inaccurate or incomplete case reserves and claims settlements, poor service quality or excessive claims handling costs. These risks may damage the Group brand and undermine its ability to win and retain business or incur punitive damages. These risks can occur at any stage of the claim life cycle.

### Managing & Mitigating the Risk

The Group’s claims teams are focused on delivering quality, reliability and speed of service to both internal and external clients. Their aim is to adjust, and process claims efficiently, in accordance with the policy’s terms and conditions, the regulatory environment and the business’ broader interests. Prompt and accurate case reserves are set for all known claims liabilities, including provisions for expenses, as soon as a reliable estimate can be made of the claims liability.

The following risks are included in the Risk, Capital & Compliance Committee and Board’s quarterly review of risk: incurred claim movements, case reserve stability, volume of denials and volume of complaints.

## Reserving Risk

### Nature of the Risk

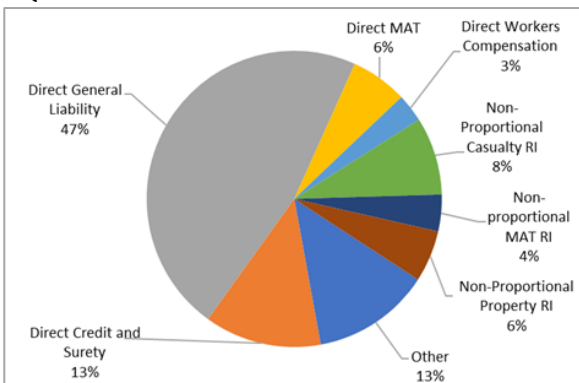
Reserving risk occurs within the Group where established insurance liabilities are insufficient through inaccurate forecasting, or where there is inadequate allowance for expenses and reinsurance bad debts.

### Risk Profile & Concentration of the Risk

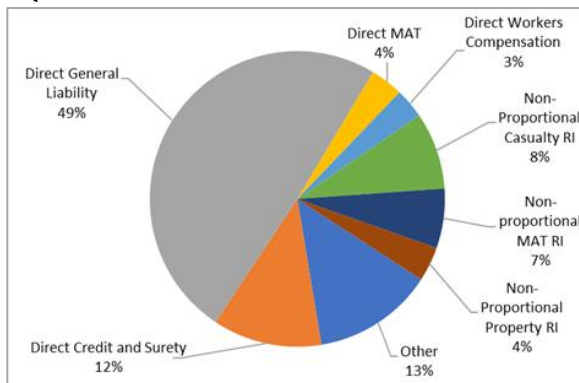
The pie charts below illustrate the concentration of Solvency II Net Claims Provisions, for Q4 2023 and Q4 2022, including unallocated loss adjustment expenses, for the Group and the Company.

#### Group

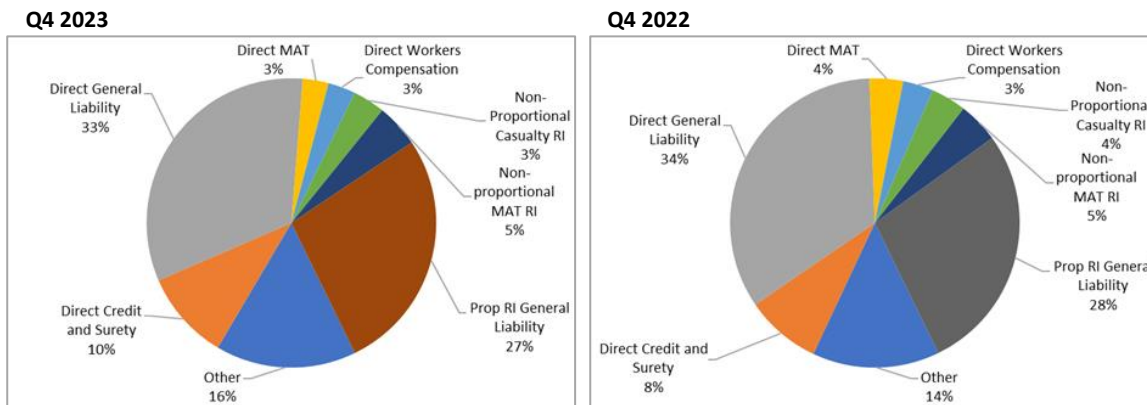
Q4 2023



Q4 2022



## Company



Overall, net reserves for the Group have increased from Q4 2022 to Q4 2023 from \$1002 million to \$ 1196 million, with the Company Q4 2023 net reserves being \$1038 million. The pie charts indicate that, on a Group and Company basis, the proportions between the various lines have generally remained stable, with the absolute increase in reserves reflecting the increase in volume of business written during 2023, as noted in Section A.

## Managing & Mitigating the Risk

The objective of the Group's reserving policy is to produce accurate and reliable estimates that are consistent over time and across classes of business. The Group's reserving process is governed by the IBNR Committee, a subcommittee of the Board, which meets on a quarterly basis (more frequently if catastrophic events require). The membership of the IBNR Committee is comprised of executives, actuarial, claims and finance representatives. A fundamental part of the reserving process involves information from and recommendations by each underwriting team for each underwriting year and reserving class of business. These estimates are compared to the actuarial estimates (described in further detail below) and management's best estimate of IBNR is recorded. It is the policy of the Group to carry, at a minimum, the actuarial best estimate (sometimes referred to as the actuarial mid-point). It is not unusual for management's best estimate to be higher than the actuarial best estimate.

The actuarial reserving team uses a range of recognised techniques to project current paid and incurred claims and monitors claim development patterns. This analysis is then supplemented by a variety of tools including back testing, scenario testing, sensitivity testing and stress testing.

The following risks are included in the Risk, Capital & Compliance Committee and Board's quarterly review of risk: maintaining reserves at, or above, actuarial midpoint; monitoring any reserve deteriorations.

## C2 – Market Risk

### Nature of the Risk

Market risk arises where the value of assets and liabilities or future cash flows change as a result of fluctuations in economic variables, such as movements in foreign exchange rates, interest rates and market prices.

For foreign exchange risk, the Group's functional and reporting currency is the US Dollar and when possible, the Group generally hedges currency liabilities with assets in those same currencies of similar value and duration. Excess assets are generally held in US Dollars. The effect of this on foreign exchange risk is that the Group is mainly exposed to revaluation FX gains/losses of unmatched non-US Dollar denominated positions.

For interest rate risk, most of the Group's financial instruments, including cash, fixed rate bonds and certain financial assets measured at fair value, are exposed to movements in market interest rates.

### Risk Profile & Concentration of the Risk

A full list of assets, under Solvency II valuation rules may be found in Quantitative Reporting Template (QRT) S.06.02. In summary, the split of assets for the Company and Group, as at 31 December 2023, is as follows:



Asset Type & Rating (\$'m)	Group	Group	HCCI	HCCI
	2023	2022	2023	2022
Government Bonds AAA	119.3	105.0	107.2	92.4
Government Bonds AA+	95.8	75.4	85.1	66.3
Government Bonds AA	87.6	86.5	74.0	72.9
Government Bonds AA-	90.6	89.0	76.7	77.4
Government Bonds A+	39.8	38.2	31.6	30.6
Government Bonds A	15.1	18.5	11.9	10.8
Government Bonds A-	21.1	27.7	19.7	23.4
Government Bonds BBB+	4.8	10.3	4.8	8.9
Government Bonds BBB-	-	0.0	-	-
Government Bonds BBB	-	-	-	-
Corporate Bonds AAA	46.9	41.6	46.9	39.9
Corporate Bonds AA+	22.1	18.1	17.4	15.3
Corporate Bonds AA	23.7	17.6	21.0	8.5
Corporate Bonds AA-	134.6	103.7	102.0	78.1
Corporate Bonds A+	155.4	140.9	101.7	89.6
Corporate Bonds A	254.8	218.6	191.3	151.4
Corporate Bonds A-	323.2	203.9	211.6	144.1
Corporate Bonds BBB+	246.2	199.8	181.6	173.7
Corporate Bonds BBB	181.7	97.6	151.4	73.9
Corporate Bonds BBB-	32.0	23.9	26.3	20.9
Corporate Bonds BB-	1.4	-	1.4	-
Corporate Bonds BB	8.0	1.3	7.0	1.3
Collateralised Securities AAA	0.4	15.8	0.4	0.4
Collateralised Securities AA+	419.5	316.8	386.9	302.7
Collateralised Securities A	2.0	-	1.9	-
Cash & Cash Equivalents	84.4	111.2	49.8	59.8
Deposits other than cash equivalents	183.8	150.5	151.8	93.3
Collective Investment Funds	166.2	146.8	161.9	121.5
Investment in Subsidiary	14.0	17.1	328.1	253.3
Property (Other than own use)	0.1	0.2	0.1	0.2
Property, Plant & Equipment held for own use	7.4	7.2	5.7	5.3
<b>Total</b>	<b>2,782.0</b>	<b>2,283.3</b>	<b>2,557.3</b>	<b>2,016.0</b>

Key movements in the year are driven primarily by the investment of operational cash flows. It should be noted that there are no derivatives within the investment portfolio. The collateralised assets represent collateral for various Credit contracts.

### Managing & Mitigating the Risk

Managing investment risk is fundamental to the operation and development of the Group's investment strategy and is key to the investment of Group assets.

The Investment Committee has an objective to ensure funds are invested in accordance with the 'prudent person principle', whereby: i) assets are of appropriate security, quality and liquidity; ii) are adequately diversified and are localised; and iii) broadly match the liabilities in terms of value and duration. This is achieved by: i) setting an appropriate strategy and risk appetite; ii) regular monitoring of the portfolio against key metrics (outlined at the end of the section); and iii) use of independent experts.

The investment strategy is developed by reference to an investment risk budget, set annually by the Board as part of the overall risk budgeting framework of the business. The investment risk budget is set at a level such that the amount of an investment loss, at the



1-in-200 Tail Value at Risk level, is limited to the Group's excess capital (above the SCR). The investment risk budget has been at a similar level since 2019.

Investment strategy is consistent with this risk appetite and investment risk is monitored on an ongoing basis with the assistance of New England Asset Management. The internal model includes an asset risk module, which uses an Economic Scenario Generator to simulate multiple simulations of financial conditions, to support stochastic analysis of investment risk. This is supplemented by bespoke analysis from our investment consultants. Internal model output is used to assess potential investment downsides, at different confidence levels, including '1 in 200' year event, which reflects Solvency II modelling requirements. In addition, we undertake regular scenario tests (which look at shock events such as yield curve shifts, credit spread widening, or the repeat of historic events) to assess the impact of potential investment losses.

Economic Scenario Generator outputs are regularly validated against actual market conditions, but (as noted below) the Group also uses a number of other qualitative measures to support the monitoring and management of investment risk.

For foreign exchange risk, the Group operates in five main currencies: US Dollars, Euros, Sterling, Australian Dollars and Swiss Francs. Transactions in all currencies are converted to the US Dollar functional currency on initial recognition with any balances on monetary items at the reporting date being translated at the US Dollar spot rate. Additionally, as a requirement under UK GAAP, for the purposes of applying the requirement of section 30 Foreign Currency Translation of Financial Reporting Standard (FRS) 102, "The Financial Reporting Standard applicable in the UK and Republic of Ireland".

For interest rate risk, the Group manages interest rate risk by investing primarily in short duration financial assets along with cash. The Investment Committee monitors the duration of these assets on a regular basis.

Changes in interest rates also impact the present values of estimated Group liabilities, which are used for solvency calculations. Our investment strategy reflects the nature of our liabilities, and the combined market risk of investment assets and estimated liabilities is monitored and managed within specified limits.

The following risks are included in the Risk, Capital & Compliance Committee and Board's quarterly review of risk: investment returns, asset durations, currency mismatches, volume of risk assets and asset security ratings.

## C3 – Credit Risk

### Nature of the Risk

Credit risk arises where counterparties fail to meet their financial obligations in full as they fall due. The primary sources of credit risk for the Group are:

- Reinsurers – whereby reinsurers may fail to pay valid claims against a reinsurance contract held by the Group;
- Brokers and coverholders – whereby counterparties fail to pass on premiums or claims collected or paid on behalf of the Group;
- Investments – whereby issuer default results in the Group losing all or part of the value of a financial instrument;
- Financial institutions holding cash.

### Risk Profile & Concentration of the Risk

This section is broken down between the primary sources of credit risk.

#### Reinsurers

The table below shows the credit rating, based on S&P ratings, of the reinsurers backing the reinsurance programme. As the programme is shared across all TMHCC International entities, the figures shown relate to all entities.

Reinsurer Rating	Proportion of Reinsurance Exposure <sup>1</sup>
AA+	0.0%
AA	4.6%
AA-	31.6%
A+	43.3%
A	12.4%
A-	2.8%
NR	5.3%

<sup>1</sup>: Reinsurance Exposures based on Excess of loss first loss contracts, across all entities

**Investments**

The credit weighting relating to assets is shown under C2 – Market Risk.

**Managing & Mitigating the Risk**

The Group's core business is to accept significant insurance risk and the appetite for other risks is low. This protects the Group's solvency from erosion from non-insurance risks so that it can meet its insurance liabilities.

The Group limits exposure to a single counterparty or a group of counterparties and analyses the geographical locations of exposures when assessing credit risk.

An approval system also exists for all new brokers and coverholders and their performance is carefully monitored. Regular exception reports highlight trading with non-approved brokers, and the Group's credit control function frequently assesses the ageing and collectability of debtor balances. Any large, aged items are prioritised and where collection is outsourced incentives are in place to support these priorities.

The Investment Committee has established comprehensive guidelines for the Group's Investment Managers regarding the type, duration and quality of investments acceptable to the Group to ensure credit risk relating to the investment portfolio is kept to a minimum. The performance of the Investment Managers is regularly reviewed to confirm adherence to these guidelines.

The Group has developed processes to formally examine all reinsurers before entering new business arrangements. New reinsurers are approved by the Reinsurance Approval Group, which also reviews arrangements with all existing reinsurers at least annually. Vulnerable or slow-paying reinsurers are examined more frequently. To assist in the understanding of credit risks, A.M. Best, Moody's and S&P ratings are used.

The following risks are included in the Risk, Capital & Compliance Committee and Board's quarterly review of risk: reinsurers security rating, reinsurance exhaustion, exposure to individual reinsurers, aged outward reinsurance balances, exposure to individual brokers, exposure to individual investment holdings.

**C4 – Liquidity Risk****Nature of the Risk**

Liquidity risk arises where cash may not be available to pay obligations when due at a reasonable cost. The Group is exposed to daily calls on its available cash resources, principally from claims arising from its insurance business. In the majority of cases, these claims are settled from premiums received.

**Risk Profile & Concentration of the Risk**

The table in Section C2 shows that a significant proportion of assets are readily realisable. These are spread among a wide group of issuers. For example, the government bonds are spread over 200 national or quasi-national government issuers for the Group, with the largest (the UK government) being about 8% of all government bonds. On top of this, the regular inflow of premiums means that a very high level of liquidity is maintained, should the need arise.

The total amount of the expected profit included in future premiums as calculated in accordance with Article 260(2), which is now on a gross of reinsurance basis, is \$161 million for the Group and \$125 million for the Company (2022: \$231 million for the Group and \$155 million for the Company). Future premiums come from either current balances or unaccepted premiums. For current balances, it is assumed that they related to unearned business. Future profit is assessed by comparing these premiums to: i) losses derived by applying the same loss ratio as for the whole unearned premium reserve (UPR), which are derived from the Solvency II technical provision process and are based on actuarial Initial Expected Ultimate Loss Ratio or corresponding budget loss ratios (for those lines not actuarially analysed); and ii) expenses derived by using the expense ratio of the whole UPR, which are derived from the Solvency II technical provision process.

The following risks are included in the Risk, Capital & Compliance Committee and Board's quarterly review of risk: inwards and outwards aged debts, asset and liability duration measures.

**Managing & Mitigating the Risk**

The Group's approach is to manage its liquidity position so that it can reasonably survive a significant individual or market loss event (details of the Group's management of its exposure to loss scenarios are provided above under the heading of Underwriting Risk). This means that the Group maintains sufficient liquid assets, or assets that can be converted into liquid assets at short notice and without any significant capital loss, to meet expected cash flow requirements. These liquid funds are regularly monitored using cash

flow forecasting to ensure that surplus funds are invested to achieve a higher rate of return. The Group can also draw on parental funds to bridge short-term cash flow requirements, should the need arise.

## C5 – Operational Risk

### Nature of the Risk

Operational risk arises from the risk of losses due to inadequate or failed internal processes, people, systems, service providers or external events. Operational risk includes conduct risk.

### Risk Profile & Concentration of the Risk

The tables below show the top 5 worst case and near-term operational risks for HCCII, from the most recent Operational Risk scenario review undertaken in 2023.

Worst Case as at 31 <sup>st</sup> December 2023 Operational Risks	Near Term as at 31 <sup>st</sup> December 2023 Operational Risks
High Profile Third Party Disputes	Loss of Key Personnel
Loss of Key Personnel	Cyber Resilience Risk
IT Architecture and Infrastructure Risk	Enterprise Change Risk
Business Continuity Risk	Data Quality Risk
Cyber Resilience Risk	IT Architecture and Infrastructure Risk

### Managing & Mitigating the Risk

The Group actively manages and minimises operational risks where appropriate. This is achieved by implementing and communicating guidelines and detailed procedures and controls to staff and other third parties. The Group regularly monitors the performance of its controls and adherence to procedures through the risk management reporting process. Key components of the Group's operational control environment include:

- modelling of operational risk exposures and scenario testing;
- management review of activities;
- documentation of policies and procedures;
- preventative, directive and detective controls within key processes;
- contingency planning; and
- other systems' controls.

Addressing conduct risk has always been treated as a priority irrespective of the regulatory emphasis on the selling of financial products, including insurance products, to consumers. The Group's primary objective is that all policyholders should receive fair treatment throughout the product lifecycle, which requires the effective management of conduct risk. However, conduct risk is not limited to the fair treatment of customers and our Conduct Risk Policy broadly defines conduct risk as '...the risk that detriment is caused to the company, our customers, clients or counterparties because of the inappropriate execution of our business activities.'

The Group therefore seek at all times to perform its business activities in a manner that is not only fair, honest and transparent but that also complies fully with applicable UK and International laws and regulations and internal policies and procedures. We ensure that this ethos is clearly communicated from the Board of Directors downwards to all members of staff and oversight is provided throughout the governance structure, primarily by way of the Product Governance and Distribution Committee. Day-to-day responsibility for monitoring the fair treatment of customers and broader aspects of conduct risk resides with the International Compliance Department which undertakes scheduled reviews as part of a comprehensive Compliance Monitoring schedule.

The following risks are included in the Risk, Capital & Compliance Committee and Board's quarterly review of risk: turnover (including from key staff), salary and benefits benchmarking, staff sickness, IT and other projects, data quality, compliance with regulations and standards.

In order to meet the requirements of Operational Resilience, the Operational Resilience Office (ORO) was established in October 2022 with the appointment of a Head of Operational Resilience. The ORO works with all interested parties to enhance Operational Resilience across the enterprise. To track the implementation of Operational Resilience, the ORO reports to the Operational Risk Group on a quarterly basis, providing status updates on each of the core pillars required to be completed before March 2025.

## C6 – Other Material Risks

This section covers strategic, regulatory and group risks which the Group manages together, but which are outlined separately below. Sustainability Risk which could represent a material risk to the Group (and the Company) is also outlined, as well as uncertainties related to other current prominent risks, such as the Ukraine / Russia Conflict, Brexit, Operational Resilience, outsourcing, inflation risk and pandemic risk.

### Strategic Risk

#### Nature of the Risk

This is the risk that the Group's strategy is inappropriate or that the Group is unable to implement its strategy. Where an event occurs outside the Group's strategic plan, this is escalated at the earliest opportunity through the Group's monitoring tools and governance structure.

#### Managing & Mitigating the Risk

On a day-to-day basis, the Group's management structure encourages organisational flexibility and adaptability, while ensuring that activities are appropriately coordinated and controlled. By focusing on the needs of their customers and demonstrating both progressive and responsive abilities, staff, management and outsourced service providers are expected to excel in service and quality. Individuals and teams are also expected to transact their activities in an open and transparent way. These behavioural expectations reaffirm low risk tolerance by aligning interests to ensure that routine activities, projects and other initiatives are implemented to benefit and protect resources of both local business segments and the Group as a whole.

The following risks are included in the Risk, Capital & Compliance Committee and Board's quarterly review of risk: combined ratio, net earnings versus budget, probability of a loss, expenses, Solvency II available assets.

### Regulatory Risk

#### Nature of the Risk

Regulatory risk is the risk arising from not complying with regulatory and legal requirements. The operations of the Group are subject to legal and regulatory requirements within the jurisdictions in which it operates, and the Group's compliance function is responsible for ensuring that these requirements are adhered to. Regulatory risk includes capital management risk, which is owned by the finance team.

#### Managing & Mitigating the Risk

The Group is committed to carrying out its business activities fairly, honestly, transparently and in compliance with legal and regulatory requirements, to enhance stakeholder trust. This approach is embedded in the Group's business and governance framework through policies, procedures and compliance monitoring. TMHCC Group's code of business conduct and ethics together with TMHCC International's employee handbook set out how we operate and include reference to specific policies, including: whistleblowing; anti-bribery, conflicts of interest and treating customers fairly statement. All new employees are provided with e-training modules that cover ethics, anti-bribery and data protection.

The Group estimates its Economic capital requirements using an internal ECM which, the Directors believe, is the most appropriate tool to determine the Company's medium term capital needs. However, the Company is currently outside of the PRA Internal Model Approval Process and since 1 January 2017 has measured regulated capital requirement using the Standard Formula SCR. The Board has reviewed the Standard Formula SCR against the ECM and has concluded that the Standard Formula SCR is appropriate. The Standard Formula SCR is measured against the Company's Solvency II Available Assets to monitor its Solvency. Given the inherent volatility of the Standard Formula SCR and Solvency II Available Assets, the Company carries an amount in excess of the regulatory minimum.

### Group Risk

#### Nature of the Risk

Group risk occurs where business units fail to consider the impact of their activities on other parts of the Group, as well as the risks arising from these activities. There are two main components of group risk, Contagion and Reputation, which are explained below.

Contagion risk is the risk arising from actions of one part of the group which could adversely affect any other part of the group. The Group is a member of the Tokio Marine and therefore may be impacted by the actions of any other group company.

Reputation risk is the risk of negative publicity as a result of the Tokio Marine contractual arrangements, customers, products, services and other activities.

#### **Risk Profile & Concentration of the Risk**

The Company engages in various intra-group transactions, which are transacted on an arm's length or open market basis, where relevant. Since the acquisition of TMHCC Group by Tokio Marine there has been an increase in intra-group transactions.

#### **Managing & Mitigating the Risk**

Contagion risk is managed by operating with clear and open lines of communication across the group to ensure all group entities are well informed and working to common goals.

For reputation risk, the Group's preference is to minimise reputation risks, but it is not possible nor beneficial to avoid them, as the benefits of being part of the group brand are significant. We consider reputation risk as an impact on all risk events in the Risk Register, but not as a risk in its own right.

### **Sustainability Risk**

#### **Nature of the Risk**

The issue of Sustainability, whether it relates to the strategic and operational risks of addressing environmental, social and governance concerns, including climate change, or our social responsibilities to both our external and internal stakeholders, is not a new risk, but its profile has been raised significantly over the last few years.

#### **Managing & Mitigating the Risk**

Sustainability risk, including climate change risk, continues to be recognised as a continuing key risk for the Group. 2023 saw further work in terms of: 1) continuing to embed Sustainability risk within its governance and risk frameworks; 2) further development of risk appetites, and risk metrics to monitor them, particularly with regard to investments; 3) further work on potential quantitative impacts of climate change, including capital assessments and impacts from Reverse Stress Tests; and 4) development of various initiatives including Business Travel initiative to allow for future CO2 emissions data capture.

### **Inflation Risk**

#### **Nature of the Risk**

Inflation risk, particularly social inflation, has become a hot topic in the industry.

#### **Managing & Mitigating the Risk**

The impact of inflation will vary widely, noting that a significant proportion of the business comprises short-tail, non-US business, where the inflation poses relatively little risk, although for some other lines of business (e.g. Energy) inflation has a greater impact. Management, therefore has looked at the how the risk is being mitigated in the areas of underwriting, claims, reserving and capital modelling and have concluded that the mitigations are appropriate. Explicit allowance for inflation is now incorporated within the reserving process and within the capital model. In the current inflationary environment, the risk is being kept under close review.

### **Outsourcing & Supplier Management Risk**

#### **Nature of the Risk**

As the organisation grows, reliance on outsourcing and supplier management also increases, through the ever-greater use of cloud service providers to ensure system/data back-up capabilities, or the increased use of coverholders, arising from new LOBs such as Delegated Property and Marine Cargo.

#### **Managing & Mitigating the Risk**

Outsourcing and supplier management is a key focus for the Group, in light of greater reliance on cloud service providers and increased use of coverholders. Strong risk governance in this area is vital to ensure uninterrupted service to both external and internal stakeholders. It is also a sub-component of Supply Chain risk, which is an area subject to increased scrutiny with regulatory focus on

insurers and their ability to demonstrate their operational resilience in this regard. Against a backdrop of increased digitalisation of the insurance market and escalating cyber-security threats, robust supply chain management is paramount. A central Vendor Management System has been purchased, and is being implemented, as part of a project that will better ensure the performance of due diligence and monitoring against service standards. Resilience standards are also in the process of being developed to ensure that any disruption experienced by the Group's material outsourcers does not impact the service they provide to the company.

## C7 – Any other information

### Top 10 Risks

Risk Registers are produced, and risks managed at underlying entity level (i.e. Company and TME), rather than at the Group level. Therefore, this sub-section looks at the key risks in the Company register, with the TME key risks detailed in the bespoke TME SFCR. The table below identifies the top ten risks, on both a worst case and near-term scenario basis for the Company, as a result of the most recent risk register review and scoring exercise.

Worst Case As at 31st December 2023	Near Term As at 31st December 2023
Risks	Risks
Reserving Risk	Reserving Risk
Catastrophe/Large Losses Outside of Business Plan	Systemic Losses Outside of Business Plan
Systemic Losses Outside of Business Plan	Catastrophe/Large Losses Outside of Business Plan
Selection Risk	Selection Risk
Investment Market Volatility	Investment Market Volatility
Foreign Exchange Risk	Foreign Exchange Risk
Outwards Reinsurance Risks	Credit Rating Risk
Cyber Underwriting Risk	Outwards Reinsurance Risks
Inadequate Pricing Methodology	Loss of Key Personnel
High Profile Third Party Disputes	Failure of Investment Counterparty

On both a worst case and near-term basis, insurance and market risks constitute the majority of the top ten risks. These quantifications are derived from the Company's economic capital model. The operational and credit risks are calculated from scenario analysis performed with risk owners.

In addition to identifying the quantitative nature of the risks, we also look at the qualitative nature that takes into account the controls we have in the business to reduce these risks and assign residual score probability and impact assessments to each of the risks in turn, independently of the worst-case scenarios.

The business, by its very nature, has the potential for some significant losses and it is important that these exposures are mitigated. The Board is comfortable, based on the above analysis, that these risks are adequately mitigated and therefore would not expect these losses to occur, even in the tail.

### Stress & Scenario Testing

As part of the overall process of risk control and in consideration of business strategy, capital setting and understanding the risk profile, various adverse stress scenarios are considered by the business. These include: 1) reverse stress tests, which look at events or combination of events that could threaten the viability of the business; 2) compound scenarios, which identify various nearer term scenarios that help the business better understand risk drivers of HCCII; and 3) stress tests around business plans, to identify key assumptions and risks to achievement.

The table below outlines our compound scenarios (also called Stress & Scenario Tests, or SSTs) and provides an indication of the potential impact of such an event on the Solvency II Coverage Ratio (Own Funds/SCR).

Scenario	Summary of Scenario	Potential Impact on Coverage Ratio Post Scenario	
		Group	Company
<b>SST1</b> Scenario driven by Operational Losses	SST 1.1 - Significant Losses caused by a loss of key personnel. It is calibrated to an estimated 1 in 20-year event.	-8%	-7%
	SST 1.2 - Loss of key revenue stream. It is calibrated to an estimated 1 in 50-year event.	-3%	-2%
<b>SST2</b> Large event and business continuity	A combination of Nat Cat, pandemic or other large event which impacts business continuity. It is calibrated to an estimated 1 in 50-year event.	-20%	-23%
<b>SST3</b> A significant loss impacting a LOB	A significant loss impacting a LOB, arising from events such as the collapse of a major counterparty or political unrest. It is calibrated to an estimated 1 in 10-year event.	-29%	-24%
<b>SST4</b> Cyber Loss	Cyber-attack impacting the business. It is calibrated to an estimated 1 in 50-year event.	-18%	-10%
<b>SST5</b> Latent Liability Claims	A significant change in legislation causes previous outstanding losses to increase such as latent liability claims. It is calibrated to an estimated 1 in 20-year event.	-3%	-4%

## Emerging Risks

Identification and analysis of emerging risks is key to ensuring that the business strategy is sound and considers areas of potential impact that may not be apparent in today's environment.

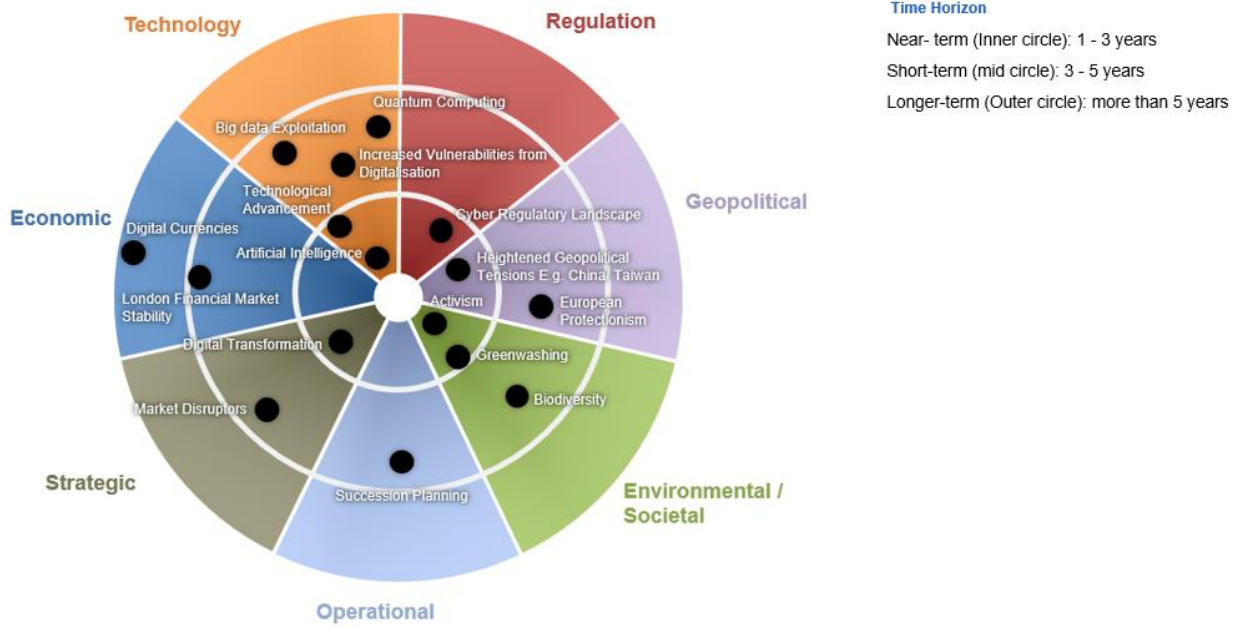
The Group and Company define emerging risks as any issue perceived to be potentially significant, but which is not currently fully understood or allowed for in the business strategy, insurance terms, pricing, reserving or capital setting. Emerging risks that have been identified and are considered to be rapidly developing, with impacts that could materialise within a time horizon of 12 months, are monitored through a Live Risk Tracker.

Emerging risks are considered when performing a number of key processes throughout the year. Initially these are considered as part of the annual strategic and business planning process involving all risk owners across the underwriting units, but also overlaid with assessment from support functions – as part of forecasting for the year(s) ahead. Each is asked to consider whether there are i) any emerging risks in their area of ownership and ii) whether they believe this could have an adverse impact on achieving the stated objectives of the Group and the Company. In addition, emerging risks are discussed within the quarterly review of the risk register and considered when reviewing the risk register for completeness.

Overall, management believes the business monitors emerging risks appropriately and considers their impact on the Group and Company proportionately.

The radar below provides details of those areas identified as emerging or Live risks as at Q4 2023. As noted above, the items included for consideration on the emerging risk radar are tightly defined as those areas which are not currently allowed for in the business strategy, insurance terms, pricing, reserving or capital setting in any capacity. This creates a very focussed analysis of risks, affording the monitoring and management of these to be closely governed.

# Emerging Risks – Q4 2023 (1 – 5 Year Horizon)





## Section D – Valuation for Solvency Purposes

The Solvency II Directive (Article 75) requires that an economic, market-consistent approach to the valuation of assets and liabilities is taken. The basis of preparation of the assets and liabilities for solvency purposes is aligned with the basis of preparation of the UK statutory financial statements, unless otherwise documented below. This applies to both the Group and Company Solvency II Own Funds valuation.

The Group and Company financial statements have been prepared in conformity with UK GAAP on a going concern basis. The details of key accounting policies used by the Group and Company can be found below.

The table below summarises the Solvency II and the UK GAAP valuation of assets and liabilities for Group and Company, based on the Solvency II balance sheet headings and the Solvency II approach to classifying assets and liabilities. An explanation of the Solvency II valuation methods and assumptions, including key differences to those used under UK GAAP is provided in the subsequent sections.

\$'000	Group		Group	Group	Company		Company
	31 Dec 2023				31 Dec 2022	31 Dec 2023	
Assets (D.1)	UK GAAP	Solvency II	Solvency II	Solvency II	UK GAAP	Solvency II	Solvency II
Investments (D1.1)	2,656,306	2,690,234	2,164,850	2,164,850	2,622,850	2,501,549	1,950,892
Goodwill (D1.2)	69,004	-	-	-	-	-	-
Intangible assets (D1.3)	37,824	-	-	-	-	-	-
Deferred tax assets (D3.1)	-	-	-	-	2,198	-	5,999
Deferred acquisition costs (D1.4)	153,194	-	-	-	123,599	-	-
Property, plant & equipment held for own use (D1.5)	7,417	7,417	7,239	7,239	5,663	5,663	5,325
Reinsurance recoverables from Non-Life (D2)	1,263,322	726,728	599,375	599,375	653,608	366,076	238,011
Insurance and intermediaries receivables (D1.6)	350,460	101,974	107,191	107,191	194,057	22,239	39,379
Reinsurance receivables (D1.6)	297,493	112,391	96,850	96,850	138,936	-	64,620
Receivables (trade, not insurance) (D1.6)	50,104	64,585	87,606	87,606	107,369	107,369	69,606
Cash and cash equivalents (D1.7)	100,071	84,368	111,217	111,217	49,793	49,793	59,826
Any other assets, not elsewhere shown (D1.8)	20,418	493	769	769	15,724	-	51
<b>Total assets</b>	<b>5,005,613</b>	<b>3,788,190</b>	<b>3,175,097</b>	<b>3,175,097</b>	<b>3,913,797</b>	<b>3,052,689</b>	<b>2,433,709</b>
<b>Liabilities (D.2-3)</b>							
Technical provisions – Non-Life (D2)	3,156,616	1,935,182	1,679,536	1,679,536	2,268,118	1,433,077	1,202,668
Deferred tax liabilities (D3.1)	7,557	81,889	5,809	5,809	-	54,656	-
Insurance & intermediaries payables (D3.2)	43,103	43,103	46,412	46,412	11,917	11,917	16,820
Reinsurance payables (D3.2)	252,832	121,877	152,640	152,640	131,424	41,508	33,533
Payables (trade, not insurance) (D3.2)	2,420	2,420	2,324	2,324	-	-	-
Any other liabilities, not elsewhere shown (D3.3)	349,821	295,274	253,613	253,613	235,762	211,416	150,063
<b>Total liabilities</b>	<b>3,812,349</b>	<b>2,479,745</b>	<b>2,140,334</b>	<b>2,140,334</b>	<b>2,647,221</b>	<b>1,752,574</b>	<b>1,403,084</b>
<b>Excess of assets over liabilities</b>	<b>1,193,264</b>	<b>1,308,445</b>	<b>1,034,763</b>	<b>1,034,763</b>	<b>1,266,576</b>	<b>1,300,115</b>	<b>1,030,625</b>

## D1 – Assets

The Solvency II valuation approach for each asset group in the above balance sheet are detailed below except for the technical reserves which are discussed in Section D2.

### D1.1 – Investments

At 31 December 2023, the Group and Company investments were as follows:

\$'000	Group		Group	Company	Company		Company
	31 Dec 2023				31 Dec 2022	31 Dec 2023	
Investments	UK GAAP	Solvency II	Solvency II	UK GAAP	Solvency II	Solvency II	
Government bonds	469,477	474,226	450,597	406,876	411,013	382,701	
Corporate bonds	1,416,230	1,430,094	1,066,972	1,049,304	1,059,687	796,753	
Collateralised securities	420,571	421,884	332,639	388,090	389,293	303,118	
Collective investments undertakings	166,153	166,153	146,835	161,939	161,939	121,523	
Deposits other than cash equivalents	183,820	183,819	150,478	151,770	151,770	93,285	
Holdings in related undertakings, including participations	-	14,003	17,090	464,816	327,792	253,273	
Property (other than for own use)	55	55	239	55	55	239	
<b>Investments</b>	<b>2,656,306</b>	<b>2,690,234</b>	<b>2,164,850</b>	<b>2,622,850</b>	<b>2,501,549</b>	<b>1,950,892</b>	

Key movements in the year for the Group and Company are driven primarily by the investment of operational cash flows (see Section A3) in the period and unrealised gains and investment income. Unrealised gains are principally driven by improving leading global economies and predictions regarding interest rate cuts in 2024.

#### Bonds, Securities, Equities and Collective Investment Undertakings

For the following section, 'the Group' is inclusive of 'the Company', with both entities adhering to the same investment valuation methods.

The valuation differences between Solvency II and UK GAAP in bonds and collateralised securities, are in relation to prepayments and accrued interest. Under UK GAAP, prepayments and accrued interest on fixed income investments is included within 'Other Assets'. However, accrued interest is reclassified to investments under Solvency II.

The Group values its financial investments at fair value in accordance with FRS 102 which is consistent with the requirement under Solvency II. The Group categorises financial investments into levels 1, 2 and 3, reflecting the basis of valuation specified in FRS 102. As of 31 December 2023, more than 95% of its financial investments fell within the Level 2 category.

FRS 102 defines the disclosure of investments levels as follows:

- Level 1 – Inputs are based on quoted prices in active markets.

The Group's Level 1 investments consist of US Treasuries, money market funds and equity securities traded in an active exchange market. The Group uses unadjusted quoted prices for identical instruments to measure fair value.

- Level 2 – recent transactions in an identical or similar asset in the absence of quoted prices in active markets at the balance sheet date or are derived from or corroborated by observable market data.

The Group's Level 2 investments include its fixed maturity securities, which consist of U.S. government agency securities, foreign government securities, municipal bonds (including those held as restricted securities), corporate debt securities, bank loans, middle market senior loans, foreign debt securities, mortgage-backed and asset-backed securities (including

collateralized loan obligations).

The Group measures fair value for the majority of its Level 2 investments using matrix pricing and observable market data, including benchmark securities or yields, reported trades, broker/dealer quotes, issuer spreads, two-sided markets, bids, offers, default rates, loss severity and other economic measures. The Group measures fair value for its structured securities using observable market data in cash flow models.

The Group is responsible for the prices used in its fair value measurements and uses independent pricing services to assist itself in determining fair value of all of its Level 2 investments. The pricing services provide a single price or quote per security. The Group uses data provided by the Group's third-party investment managers to value its Level 2 investments. To validate that these quoted prices are reasonable estimates of fair value, the Group performs various quantitative and qualitative procedures, including:

- 1) evaluation of the underlying methodologies;
- 2) analytical review of the Group's fair values against current market prices; and
- 3) comparison of the pricing services' fair value to other pricing services' fair value for the same investment.

No markets for the Group's investments were judged to be inactive at period end. Based on these procedures, the Group did not adjust the prices or quotes provided by its independent pricing services, third party investment managers as of 31 December 2023 or at 31 December 2022.

- Level 3 – use of a valuation technique where there is no market of other transactions which is a good estimate of fair value.

These comprise financial instruments where it is determined that there is no active market or that the application of criteria to demonstrate such are Level 2 securities is impractical. That fair value is established through the use of a valuation technique which incorporates relevant information to reflect appropriate adjustments for credit and liquidity risks and maximise the use of observable market data where it is available and rely as little as possible on entity specific estimates. The relative weightings given to differing sources of information and the determination of non-observable inputs to valuation models can require the exercise of significant judgement. At present, the Group has Level 3 securities in the form of investment in a real estate investment fund. The real estate investment fund is carried at net asset value. Changes in the net asset value are included in investment income.

### **Participations and related undertakings**

The participations and related undertakings included within the Company's financial statements are in respect of the subsidiaries held by the Company. These amounts are eliminated on consolidation in the assets of the Group, except for the Group's investment in Qdos and Gcube which amounted to \$14 million in 2023 (2022: \$17 million). These Group investments do not meet the definition of 'ancillary services undertakings', per article 335 of the delegated acts. As a result, they remain as a participation on the face of the Group Solvency II balance sheet.

The valuation difference between UK GAAP and Solvency II of \$137 million in the Company arises from the valuation of Qdos and Gcube on the 'adjusted equity method', with reference to Solvency II valuation rules, which include valuing intangible assets and goodwill at nil, as well as the variance between the investment in TME under UK GAAP and Solvency II valuation rules.

### **Property (other than for own use)**

The investment property, which consists of occupied long leasehold industrial units, was reviewed at 31 December 2023 on an open market basis, using reasonable judgements and contemporary evidence available. The valuation of the property in these statements remains materially correct and no impairment is required.

## **D1.2 – Goodwill**

Goodwill arose from the acquisition of GCube in 2020 and the acquisition of Qdos and its subsidiary Qdos Broker and Underwriting Services Limited in 2018.

Under UK GAAP, Goodwill is stated at cost less accumulated amortisation and accumulated impairment expense and is amortised over its useful economic life. For Solvency II, Goodwill is reviewed to identify if there is evidence of exchange of similar assets to indicate that they are saleable in a marketplace. In the absence of this evidence, Goodwill is valued at nil for Solvency II purposes.

No goodwill is held on the Company balance sheet.

### **D1.3 – Intangible Assets**

Under UK GAAP, intangible assets are stated at cost less accumulated amortisation and accumulated impairment losses. Amortisation is calculated, using a straight-line method, to allocate the depreciable amount of the assets to their residual values over their estimated useful lives. Amortisation and any impairment expense are charged to other charges in the non-technical account. Intangible assets' residual values and useful lives are reviewed, and adjusted, if appropriate, at the end of each reporting period. The effect of any change is accounted for prospectively.

Intangibles arose from the acquisition of GCube in 2020 and the acquisition of Qdos and its subsidiary Qdos Broker and Underwriting Services Limited in 2018. These intangibles represent brand and customer related assets, which have estimated useful life of fifteen years.

For Solvency II, intangible assets are reviewed to identify if there is evidence of exchange of similar assets to indicate that they are saleable in a marketplace. In the absence of this evidence, the Group's intangible assets are valued at nil for Solvency II purposes.

No intangible assets are held on the Company balance sheet.

### **D1.4 – Deferred Acquisition Cost**

For UK GAAP, acquisition costs, which represent commission and other related expenses, are deferred over the period in which the related premiums are earned.

For Solvency II valuation purposes, DAC is valued at nil at the balance sheet date.

### **D1.5 – Property, Plant and Equipment**

Under UK GAAP, the Group and Company value property, plant and equipment in the financial statements at cost less accumulated depreciation and accumulated impairment expense. Cost includes the original price, costs directly attributable to bringing the assets to its working condition for its intended use, dismantling and restoration costs. Tangible assets are capitalised and depreciated on a straight-line basis over their estimated useful lives.

For Solvency II purposes, the Directive states that property, plant and equipment should be valued on a basis that reflects its fair value. The Company believes that the depreciated cost of property, plant and equipment held on 31 December 2023 is a materially accurate approximation for fair value.

The only difference between Solvency II and UK GAAP relates to a reclassification of property, plant & equipment held in the Group Qdos and GCube participations, as detailed in Section D1.1.

### **D1.6 – Receivables**

For UK GAAP, receivables relating to outstanding premiums from policyholders are recognised in the financial statements as current assets. For Solvency II valuation purposes the outstanding premiums not yet due from policyholders are reclassified to the premium provisions element of the technical provisions

The insurance and intermediaries receivables balance represents premiums receivable due and past due adjusted for Solvency II as noted above. The balances are all due within 12 months and their fair value is not considered to be different to their amortised cost, so no further Solvency II adjustments are required.

The reinsurance receivables balance represents paid losses recoverable net of bad debt. The balances are all due within 12 months and their fair value is not considered to be different to their amortised cost, so no Solvency II adjustment is required.

The receivables (trade, not insurance) include various balances including inter-group receivables and tax. All amounts are due within 12 months and the UK GAAP values are considered to be appropriate fair value and do not need to be adjusted for Solvency II.

## D1.7 – Cash and cash equivalents

Cash and cash equivalents are valued at par under both UK GAAP and Solvency II.

The difference between UK GAAP and Solvency II for the Group pertains to cash and cash equivalents held in the Group Qdos and GCube participations, as detailed in Section D1.1.

## D1.8 – Other Assets

Under UK GAAP, Other Assets include prepayments and accrued interest on fixed income investments. However, under Solvency II, accrued interest on fixed income investments is classified under the Investments category. This results in differences between UK GAAP and Solvency II of \$20 million and \$16 million, for the Group and the Company, respectively.

In addition to the above, Other Assets held in the Group Qdos and GCube are included in this category under UK GAAP, but reclassified to Holdings in related undertakings, including participations in the Group Balance Sheet, see Section D1.1.

## D1.9 – Other Matters

The Company has not provided any unlimited guarantees and does not have any off-balance sheet assets.

## D2 – Technical Provisions

At 31 December 2023, the total value of net technical provisions for the Group was \$1,208 million, which included \$64 million in respect of the risk margin. For the Company, the total value of net technical provisions was \$1,067 million, which included \$55 million in respect of the risk margin.

The table below details the net technical provisions by Solvency II LOB by best estimate and risk margin. This table should be viewed in conjunction with the explanatory notes detailing the methodology and valuation basis (below table).

GROUP Net Technical Provisions	Net Best Estimate	Risk Margin	Net Technical Provision
31 December 2023	\$'000	\$'000	\$'000
Medical expense insurance	(156)	3	(153)
Income protection insurance	17,889	1,018	18,907
Workers' compensation insurance	40,379	1,749	42,128
Marine, aviation and transport insurance	65,457	3,224	68,681
Fire and other damage to property insurance	129,641	5,009	134,650
General liability insurance	524,185	31,667	555,852
Credit and suretyship insurance	202,820	7,127	209,947
Assistance	(375)	4	(371)
Miscellaneous financial loss	(2,167)	257	(1,910)
Non-proportional health reinsurance	5,946	277	6,223
Non-proportional casualty reinsurance	112,181	6,939	119,120
Non-proportional marine, aviation and transport reinsurance	41,517	3,009	44,526
Non-proportional property reinsurance	7,232	3,623	10,855
<b>Total</b>	<b>1,144,549</b>	<b>63,905</b>	<b>1,208,454</b>

<b>COMPANY Net Technical Provisions</b>	<b>Net Best Estimate</b>	<b>Risk Margin</b>	<b>Net Technical Provision</b>
<b>31 December 2023</b>	<b>\$'000</b>	<b>\$'000</b>	<b>\$'000</b>
Medical expense insurance	(190)	2	(189)
Income protection insurance	2,623	119	2,743
Workers' compensation insurance	34,591	1,426	36,017
Marine, aviation and transport insurance	28,367	1,590	29,957
Fire and other damage to property insurance	111,680	3,935	115,615
General liability insurance	604,180	35,483	639,663
Credit and suretyship insurance	129,881	4,347	134,228
Assistance	(794)	2	(792)
Miscellaneous financial loss	(2,081)	56	(2,025)
Non-proportional health reinsurance	4,727	211	4,938
Non-proportional casualty reinsurance	51,570	3,103	54,673
Non-proportional marine, aviation and transport reinsurance	42,849	2,547	45,396
Non-proportional property reinsurance	4,342	2,435	6,777
<b>Total</b>	<b>1,011,745</b>	<b>55,256</b>	<b>1,067,001</b>

Technical provisions are valued in accordance with Article 77 of the Solvency II Directive which states that the value of technical provisions shall be equal to the sum of the best estimate and a risk margin.

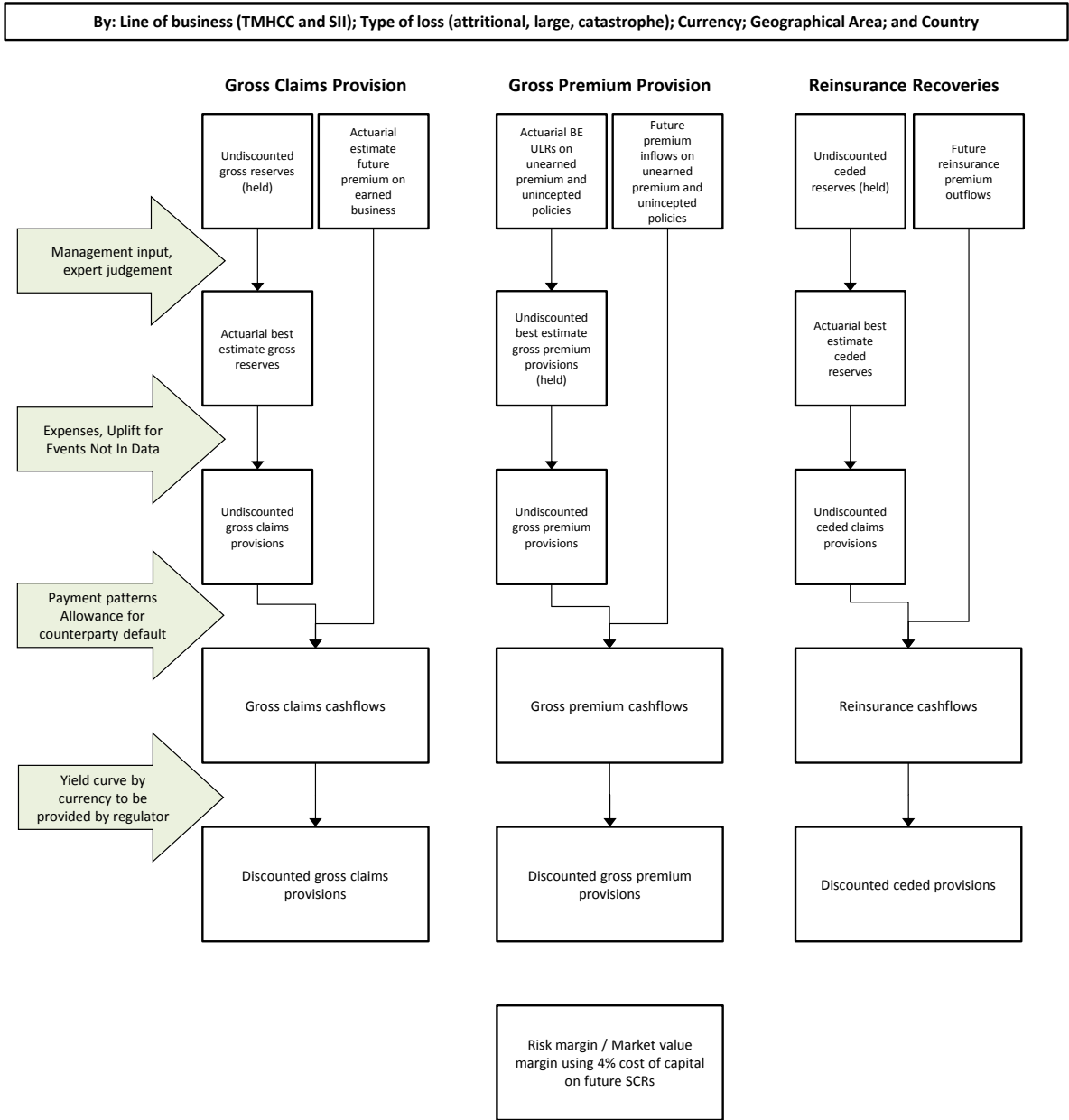
The actuarial function carries out the valuation of technical provisions and ensures continuous compliance with the requirements set out in Articles 75 to 86 regarding the calculation of technical provisions and the risks arising from this calculation.

The methodologies used are consistent across all material LOBs and the key items are summarised below.

### Technical Provisions Calculation Overview

The Group and the Company build the technical provisions value from 3 components: i) the undiscounted best estimates, ii) discounting credit; and iii) risk margin.

The process is summarised in the flowchart below. Further details are found in the remaining sub-sections.



The actuarial function’s involvement in the whole reserving process allows us to opine that the technical provisions at 31 December 2023 are sufficient and the methods/assumptions used are appropriate given the nature, scale and complexity of both the Group and the Company’s risk profile.

Sufficiency in this context means that the Group and the Company are satisfied that the process for estimating technical provisions is thorough and proportionate, and the resulting amounts are within a reasonable range that might be calculated by a number of different qualified people using various reasonable methods and assumptions.

**Undiscounted Best Estimate Claims Provisions**

As part of the Group’s and the Company’s current reserving process, the starting point for valuing Solvency II claims provisions is the actuarial best estimate of provisions for claims including outstanding claims, IBNR and allocated loss adjustment expenses.

For the purpose of our analysis, we subdivide the data using TMHCC International LOBs, as defined in Section A, where segmentation is decided subject to similar coverage, reporting patterns, underwriting controls, claims handling and homogeneity of risks. These also reflect the way its business is underwritten, reported and managed. Further details may be found under the segmentation heading below.

In general, each LOB is written across multiple TMHCC International entities. The default position is that an analysis is carried out gross and net of reinsurance and that results are reported at both of these levels. In some cases, due to the lack of reinsurance or its immaterial nature, explicit allowance is not made for reinsurance. Also, as a default, the aggregate projected IBNR reserve is allocated to legal entity using earned premium as the weighting factor. This is reviewed for reasonableness and the approach modified if required. As at 31 December 2023, all LOBs were being allocated using earned premium.

Full analyses of reserves take place at least annually. During the full analyses, attritional claims and large losses gross and net of reinsurance are projected to ultimate using the following four standard actuarial methods:

- 1) Paid Chain Ladder;
- 2) Incurred Chain Ladder;
- 3) Incurred Bornhuetter-Ferguson;
- 4) Loss Ratio method.

The method selected depends on the accident or underwriting year, gross or net of reinsurance perspective and the LOB. This is documented within the reserving files and analysis spreadsheets. Generally, for more developed years, the Incurred Chain Ladder is used and for less developed years, the Incurred Bornhuetter-Ferguson method is used. For the years where the Incurred Bornhuetter-Ferguson or Loss Ratio method is used, the ultimate claim projected is sensitive to the Initial Expected Ultimate Loss Ratio assumption (also referred to as the 'prior loss ratio' assumption). The Group and Company base their Initial Expected Ultimate Loss Ratios on historical rebased loss ratios, taking into account premium rate changes, changes in Terms and Conditions and claims inflation.

#### **Undiscounted Best Estimate Premium Provisions**

The starting point of the premium provisions is the UPR and, for bound but not incepted (BBNI), an estimate of the premium relating to policies that have an inception date post the valuation date and a bound date pre the valuation date. The Group and the Company use historical and budget data to estimate the volume of premium related to BBNI policies. This approach allows for policies bound before the valuation date, but which have not yet been captured within the policy underwriting systems at the time of calculating the technical provisions due to typical processing delays.

For LOBs that undergo actuarial review as part of the Group's and Company's reserving process the undiscounted premium provision is calculated by applying the relevant actuarial best estimate ultimate loss ratios to the UPR and the BBNI premium amounts. Where no actuarial review has been undertaken budgeted loss ratios are assumed to represent this best estimate.

The actuarial best estimate ultimate loss ratios arise from actuarial reserving analysis and correspond to a central expectation based on relevant historical experience of prior years and adjusted where appropriate for changes in mix of business and anticipated premium rate movements and loss trends. Where the actuarial best estimate loss ratio does not include provision for large losses or catastrophes, management applies loads consistent with the internal model large loss and catastrophe parameters, to account for the future occurrence of these events.

#### **Undiscounted Best Estimate Reinsurance Provisions**

Reinsurance recoveries on claims provisions are calculated directly from the estimated cash flows from current ceded claims. Reinsurance recoveries on premium provisions are estimated differently depending on the type of reinsurance.

For LOBs with quota share reinsurance, the ceded cash flows are calculated by applying the ceded percentage to the estimated gross claim cash flow.

For LOBs with excess of loss reinsurance, there will be cessions on large and catastrophe losses. Identification of the reinsurance contracts that respond to the gross losses in the premium provisions is an important aspect of estimating reinsurance recoveries as well as the associated cost of this reinsurance cover. The key considerations are the basis of the reinsurance (losses occurring or risks-attaching), the inception date of the reinsurance contract and its binding status at the valuation date.

Losses-occurring-during reinsurance contracts that incept in the future will respond to losses that occur during the reinsurance policy period.

Unless the reinsurance contract is already bound at the valuation date, we include a portion of both reinsurance premiums payable and losses ceded to future losses-occurring-during reinsurance contracts to the extent that the cover relates to existing inwards business.

Risks-attaching-during reinsurance contracts that incept in the future will respond to losses incurred on policies that incept during the reinsurance treaty period only.



Reinsurance contracts that have already incepted will respond to losses, regardless of the basis. As such we make full provision for any reinsurance premiums or reinsurance reinstatement premiums payable in the future and the associated reinsurance recoveries.

The BBNi inward policies included in the technical provisions as at valuation date, will have reinsurance treaties, incepting during the following year, attaching to their premiums and losses. A corresponding portion of the cost of this reinsurance and expected ceded losses is included in the technical provisions.

In summary, the treatment of reinsurance premiums and recoveries is as follows:

Reinsurance contract status at point of valuation	Reinsurance premiums	Reinsurance recoveries
Incepted, bound	Future premiums due allowed for in full	Full allowance for expected future recoveries associated with losses arising from all incepted as well as bound-but-not-incepted inwards business that falls within scope of the technical provisions (where the purchase of reinsurance is subject to future management actions it is assumed that cover will be renewed on existing terms)
Unincepted, bound		
Unincepted, not bound	Allow for a portion of expected premiums payable under such reinsurance contract(s) relating to the run-off of existing incepted and bound-but-not-incepted inwards business	

#### Change in expense basis

Solvency II technical provisions are required to take account of all expenses that will be incurred in servicing insurance and reinsurance obligations. These expenses will include (but not be limited to) administrative expenses, investment management expenses, claims management expenses (including claims handling expenses) and acquisition expenses (including commissions). Any allowance for expenses should be calculated on the assumption of an ongoing business basis. This requirement is different to the approach typically adopted for statutory reporting purposes where only unallocated loss adjustment expenses are explicitly considered separately, with allocated loss adjustment expenses generally included as part of the claim reserves.

#### Events Not In Data

Parameterization of models for estimating mean claims reserves using historic data will only allow for the scale of events that have been observed within history. An Events Not In Data (ENIDs) loading ensures consideration of all possible future outcomes and so allows the 'true' mean to be determined.

At least three types of events should be considered:

- Outstanding events which could go one way or another with a material change in the reserves determined by the outcome, e.g. court cases establishing liability;
- Events which will affect only the premium provision, e.g. future catastrophes; and
- Events which will affect both the premium provision and claims provision, e.g. future latent claims.

Management adds an explicit load to the best estimate for ENIDs. The approach assumes that the distributions and Coefficients of Variation selected as part of the internal model parameterization represent truncated distributions. The level of realistically foreseeable events for this purpose is taken as 1-in-40/97.5%, noting that this is broadly in line with a once-in-a-career return period. An uplift factor is derived as the ratio of the 'true mean' to the 'mean only including realistically foreseeable events'. This factor is then scaled in line with the results of a qualitative scoring framework which assesses each LOB's relative exposure to ENIDs.

The explicit provision for ENIDs increases total technical provisions by around 1%-3% depending on business mix.

The catastrophe and large loss loads applied to prospective business should be considered in conjunction with the explicit ENID load. Catastrophe and large losses in the internal model are parameterised to best capture the prospective risk. The parameterization does not rely solely on historical losses but also on the nature and scale of current risk exposures. The catastrophe and large losses will model events not seen in Group's and Company's history. They can therefore be considered as contributing to bringing technical provisions from the 'foreseeable events' basis to 'all possible outcomes' required under Solvency II.

### Counterparty Default Risk

The traditional reinsurer bad debt provision is generally increased to include potential losses on recoveries on premium provisions. For the current year, and consistent with the internal model assumptions, we have concluded that counterparty default risk on policyholder debtors, deposits with ceding institutions, and letters of credit is not material and thus is not included in technical provisions. These assumptions are consistent with the prior year.

### Cash Flows and Discounting

Solvency II technical provisions are valued with consideration of the time value of money, and thus the potential investment income on reserves decreases the amounts of the liabilities. Cash flows are calculated by applying appropriate payment patterns to the undiscounted best estimates.

Payment patterns are derived using triangles of relevant historical paid losses. Where there is insufficient data to calculate a credible payment pattern from internal data, payment patterns from a similar LOB, adjusted or unadjusted, may be used or the payment pattern exhibited by a suitable benchmark dataset, such as the Lloyd's Market Association risk code triangles, may be used. Payment patterns may differ according to year of loss, whether the claims are attritional / large / catastrophe, or relate to gross or ceded cash flows.

The payment patterns are fitted to quarterly development data and we discount cash flows assuming payments take place at the end of each quarter.

The Group and the Company use the yield curves as provided by EIOPA and PRA. These are applied to the best estimates of undiscounted annual cash flows by currency. It should be noted that the Economic Scenario Generator is not used within the technical provision process.

### Assumptions about policyholder behaviour

The two main areas of policyholder behaviour considered relate to lapses and renewal rates.

The valuation of the technical provisions assumes that the policies will remain in force including any policies where the policyholder has an option to lapse, or the Group and the Company have an option to lapse. In the expected course of events the Group and the Company do not operate a policy of cancelling contracts and historical experience implies a best estimate based on no material policyholder lapses. This assumption is unchanged since the last reporting period.

Renewal rate assumptions are taken from underlying business plans at the LOB level for the following year. These are based on historical experience and underwriter judgement. The assumptions are materially unchanged since the last reporting period.

### Risk Margin

Article 37 of the Delegated Acts, as amended by The Insurance and Reinsurance Undertakings (Prudential Requirements) (Risk Margin) Regulations 2023, sets out the formula which should be used to calculate the risk margin. This formula was subject to change by Her Majesty's Treasury with effect from 31 December 2023, where the cost of capital for non-life business was reduced from 6% to 4%.

The risk margin is calculated as a part of technical provisions to ensure that the value of technical provisions is equivalent to the amount that an undertaking would be expected to require to take over and meet the transferred obligations.

The method used involves the following three step process:

- Calculation of SCRs that are required to support the technical provisions at time=0 and time=1.
- For estimating SCRs at t=2 onwards, we assume that future SCRs are proportional to the best estimate technical provision for the relevant year, including a cumulative uplift to allow for the increase in variability relative to the best estimate provisions. This is an appropriate simplification because the Company's exposure to catastrophe risk and underwriting risk is only significant at t=0 due to potential catastrophe losses and expected future premium income over the one-year time horizon starting at t=0. The SCR at t=1 is therefore considered suitably representative of the run-off risk profile in which catastrophe and other underwriting risk is expired.
- The projected SCRs are then multiplied by the cost of capital of 4% p.a. (6% p.a. prior to 31 December 2023) to determine the cost of providing this amount of eligible own funds. This cost is discounted by the risk-free rate and the sum of the discounted cost of capital for each future year over the lifetime of the business giving the total risk margin.

**Overview of material changes in the level of technical provisions since last reporting period**

Results for the year ending 31 December 2023 and previous year for the Group and the Company are set out below:

Group \$'000	NET Technical Provisions Comparison to Prior Valuations		
	2023	2022	2022
	(2023 YE FX Rates)	(2023 YE FX Rates)	(2022 YE FX Rates)
Claims provisions	1,096,980	931,762	903,073
Premium provisions	47,569	87,346	86,129
Total excluding risk margin	1,144,549	1,019,108	989,202
Risk margin	63,905	93,709	90,959
<b>Total including risk margin</b>	<b>1,208,454</b>	<b>1,112,817</b>	<b>1,080,161</b>

COMPANY \$'000	NET Technical Provisions Comparison to Prior Valuations		
	2023	2022	2022
	(2023 YE FX Rates)	(2023 YE FX Rates)	(2022 YE FX Rates)
Claims provisions	948,370	803,944	781,432
Premium provisions	63,375	106,996	105,035
Total excluding risk margin	1,011,745	910,940	886,467
Risk margin	55,256	80,348	78,190
<b>Total including risk margin</b>	<b>1,067,001</b>	<b>991,288</b>	<b>964,657</b>

On a Group basis, between 31 December 2022 and 31 December 2023, the technical provisions (excluding risk margin) increased by \$125 million, after allowing for FX rate movements. This is driven by an increase in claims provisions arising from movements in claims reserves on the Financial Lines, PI UK and Treaty Reinsurance LOBs (growth in business), case estimates on the Surety and Marine Hull LOBs (claims experience), and continuing development of the relatively new Delegated Property and GCube LOBs across the TME and Company platforms, partially offset by a reduction to premium provisions due to the increase in future premium receivables/payables. The risk margin has reduced since 31 December 2022, following HMT's reduction to the prescribed cost of capital from 6% to 4%.

On a Company basis, between 31 December 2022 and 31 December 2023, the technical provisions (excluding risk margin) increased by \$101 million, after allowing for FX rate movements. This is driven by the same reasons as stated above for Group.

**Segmentation**

Calculation of technical provisions for application of the Standard Formula and for statutory reporting requires remapping of the internal LOB segmentation into Solvency II LOBs. In many cases, the Solvency II LOB is composed of multiple TMHCC International LOBs, or subsets thereof. TMHCC International LOBs are allocated to Solvency II LOB based on policy master class coding and transaction type. This allows for the unbundling of contracts into the corresponding Solvency II LOBs. The mapping is unchanged from the previous year.

**Internal data, procedures and significant deficiencies**

One of the operational risks faced by the Group and Company is that resulting from the use of poor-quality data in processes used for determining reserving and technical provisions. To mitigate this risk across TMHCC International's insurance entities, TMHCC International have a common Data Governance Policy which sets out how the organisation will document the data used to perform key business processes and ensure that it is fit for purpose. This Data Governance Policy has been applied to the Actuarial Reserving and Calculation of Technical Provisions, with the Policy being reviewed on a regular basis.

To confirm that the data used to drive these processes is fit for purpose the Group and the Company have assessed data quality using the criteria we have adopted for Solvency II (appropriateness, completeness, consistency and accuracy) following the process described below:

- Produced a data-flow chart for each business process that shows the datasets that flow into and out of the process, along with the reconciliation points that ensure data is consistent throughout the process.
- Documented at field level, the datasets used to drive each business process and recorded this information in the Data Directory.
- Assigned each data set to a subject matter expert and asked them to complete a standard data quality template containing an assessment as to whether that data set is complete and appropriate for its intended business usage.
- Developed a series of automated reconciliation reports that highlight any data inconsistencies between IT systems.
- Introduced compliance procedures to ensure that all relevant manual reconciliations are completed whenever a specific business process is performed.
- Introduced audit procedures to assess, report on and remedy the accuracy of those data elements that are material to the organization and are manually entered into systems.

Having applied the Data Governance Policy as discussed above the organisation believes that it has significantly reduced the residual risk relating to the use of poor-quality data. The process of extracting and processing the technical provision data is performed using a Pillar 3 data mart dedicated to Solvency II reporting.

One area of limitation has been identified, which relates to the lack of IBNR being available at the required level of granularity (e.g. origin period / currency / risk code combinations). This is remediated by incorporating allocation algorithms in the Pillar 3 data mart.

### **Group adjustments to individual technical provisions**

The calculation of the Group technical provisions is based on the underlying legal entities, namely the Company and TME, and includes no specific adjustments other than to allow for any intra-entity eliminations where they are applicable. This approach has been taken in respect of claims and premium provisions (both gross and ceded).

### **Third country insurance and reinsurance undertakings**

The Group's Branches in Europe are mainly in the EU. There are two that are not: the branch in Switzerland has equivalence under Solvency II and the now-closed branch in Norway, which has enacted the Solvency II regime. In January 2024, notifications for the closure of the Norwegian branch were duly submitted to both Norwegian Authorities and the CAA. The Norwegian Business Registry has completed the deregistration process of the Norwegian branch, and the branch was officially removed from the registry on 25 January 2024.

### **Consideration of assumptions or methods since the prior period**

As part of the Solvency II technical provision process, various actual versus expected (A v E) analyses are undertaken, including comparison of projected technical provisions with actual technical provisions and comparisons line by line (on a GAAP basis).

During the year, the A v E analysis did not lead us to make any adjustments to our assessment of the appropriateness, accuracy and completeness of the data nor to the methodologies applied. In addition, the A v E analysis is considered as part of the annual full re-projection process which occurs in the 2<sup>nd</sup> or 3<sup>rd</sup> quarter depending on the LOB. The Group and Company took into account the A v E by LOB and updated methods and assumptions as appropriate. However, the adjustments made (to the actuarial selected ultimates and the assumptions) were not beyond what would normally be expected to filter through during parameter reviews dependent on historical data.

### **Description of the level of uncertainty associated with the value of technical provisions**

Any estimates of loss and allocated loss adjustment expense liabilities are inherently uncertain. In our judgment, we have employed techniques and assumptions that are appropriate for the purposes of this analysis, and the conclusions presented herein are reasonable, given the information currently available. However, it should be recognised that the actual emergence of loss and allocated loss adjustment expense amounts will likely deviate, perhaps materially, from our estimates.

The Group's and the Company's reserves are dominated by Financial Lines, comprising a sizeable portfolio of International Directors and Officers business, and are mainly written through the Company. These lines tend to be both volatile and long tailed. In addition, the Group writes a small Employers' Liability book through the Company, which is exposed to potential latent disease claims.

Our Solvency II premium provision projections cover unexpired risks, and any period of future exposure is necessarily subject to a higher degree of uncertainty. This is especially the case for catastrophe-exposed classes of business (London Market LOBs), which are characterised by losses of an inherently uncertain low-frequency/high-severity nature.

Our selected point estimates are central estimates in the sense that they are not deliberately biased upwards or downwards. They do not necessarily represent a mid-point of the range of possible outcomes, as the potential for adverse movement generally exceeds the potential for favourable movement.

Sensitivity analysis around the technical provisions for the Group and the Company is undertaken annually. The conclusions of the 2023 analysis were:

- The technical provisions are most sensitive to the earned reserve levels and the loss ratios assumed in the unearned provisions. For example, using 25<sup>th</sup> and 75<sup>th</sup> percentiles from the underlying reserve distribution, rather than best estimate would change the technical provisions in the region of 14% to 18%.
- The technical provisions are also sensitive to the discount rate used, to the extent that if discount rates returned to the levels seen before the Financial Crisis of 2008, this would have an impact on the technical provisions in the region of 4%.
- The technical provisions are not so sensitive to expense overruns or changes to the risk margin calculation (less than 5%).

#### Transitional provisions on technical provisions, matching adjustment and volatility adjustment

The Group and the Company do not have any transitional provisions on technical provisions, nor make any matching or volatility adjustments.

#### The use of simplified approaches

A simplified approach is used within the risk margin calculation. Further details are provided in the risk margin section.

#### Assumptions about future management actions

The Group's and Company's technical provisions include one future management action relating to Reinsurance Structure, whereby it is assumed reinsurance that is in-force at the beginning of the year is maintained with regard to structure and cost.

This will impact the unearned and unaccepted components of the technical provisions only; known claims will have attached to prior reinsurance, if applicable.

The secondary risk associated with this reinsurance - reinsurer credit risk - is also included in the technical provisions.

#### Differences to UK GAAP Technical Provisions

Reconciliation of net technical provisions UK GAAP to Solvency II \$'000	Group 2023	Group 2022	Company 2023	Company 2022
UK GAAP technical provisions	1,893,294	1,557,631	1,614,510	1,327,691
Removal of margin of prudence	(184,789)	(86,978)	(164,118)	(71,488)
Allowance for ENIDs (binary events)	30,587	30,716	27,978	27,430
Change of expense basis	85,518	81,547	59,536	56,383
Adjustments to earned provisions	1,378	1,475	1,152	918
Removal of unearned UK GAAP provisions	(537,774)	(491,740)	(434,950)	(401,464)
Future premium iro unearned incepted business	(283,431)	(231,169)	(216,516)	(159,810)
Projected losses arising from UPR	254,271	226,763	202,916	183,771
Future premium iro unaccepted business	(58,635)	(46,220)	(55,549)	(52,345)
Projected losses arising from unaccepted contracts	69,662	76,357	95,589	102,403
Discounting credit	(125,532)	(129,180)	(118,803)	(127,022)
Inclusion of risk margin	63,905	90,959	55,256	78,190
<b>Solvency II technical provisions</b>	<b>1,208,454</b>	<b>1,080,161</b>	<b>1,067,001</b>	<b>964,657</b>

Except for the explicit margin of prudence, all items are a function of the Solvency II valuation requirements. All items are in line with expectations, both with regard to direction and quantum. The movement in the Solvency II technical provisions over the year is discussed earlier in the sub-section.

### **D3 – Other Liabilities**

The Solvency II adjustments and valuation approach for each liability group in the above balance sheet are detailed below except for the technical provisions that are discussed in sub-section D2.

There are no material classes of assets subject to leasing arrangements.

#### **D3.1 – Deferred Tax**

The valuation principles for deferred tax under Solvency II are consistent with the UK GAAP approach used to prepare the financial statements.

Deferred tax under UK GAAP is recognised, using the liability method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the financial statements. Deferred tax is calculated at the rates at which it is expected that the tax will arise. Deferred tax assets are recognised only to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilised. Deferred tax balances are not discounted. The reconciling difference between UK GAAP and Solvency II deferred tax liability is the tax effect on the Solvency II adjustments.

#### **D3.2 – Payables**

The difference between UK GAAP and Solvency II valuations for Insurance & intermediaries payables reflect not yet due balances that are reclassified to the technical provisions. The remaining balances are due or past due.

The insurance and intermediaries payables represent premiums, commissions and claims payable. The balances are all due within 12 months and are considered to be stated at fair value that is not considered to be different to their amortised cost and accordingly no further Solvency II adjustment is required.

The reinsurance payables represent reinsurance premiums and commissions payable past due. All balances are due within 12 months and, once adjusted for Solvency II as noted above, their fair value is not considered to be different to their amortised cost so no additional Solvency II adjustment is required.

#### **D3.3 – Other liabilities**

The difference between the UK GAAP and Solvency II values is in respect of reinsurance acquisition costs, which represent commission and other related expenses that are deferred over the period in which the related premiums are earned under UK GAAP. For Solvency II valuation purposes, DAC is valued at nil at the balance sheet date.

The remainder of the other liabilities includes obligations relating to Surety collateral, accrued premium taxes, settlements for investment purchases and staff costs and tax accruals. These balances are valued initially at fair value and subsequently at amortised cost under UK GAAP. There are no material differences between UK GAAP value and fair value under Solvency II.

#### **D3.4 – Other Provisions and Contingent Liabilities**

The Group and the Company do not have any other provisions and do not have any material contingent liabilities outside of the normal course of insurance.

#### **D3.5 – Employee benefits**

Employee benefits include a contributory company pension scheme which, owing to the nature of the scheme (unlike a defined benefit contribution scheme), does not feature on the UK GAAP and Solvency II balance sheets of the Group or Company.

#### ***D4 – Alternative methods for valuation***

The Group and the Company have not applied any alternative methods of valuation.

#### ***D5 – Any other information***

There is no additional information that requires disclosure.

## Section E – Capital Management

Both the Group and the Company are single shareholder entities. They have no debt financing, nor do they have any material plans to issue new shares in the short or medium term. The capital planning process is dynamic and forward-looking and is informed by the output from its risk management activities and the ORSA process. The Group and the Company carry an S&P rating of A+ and the Company benefits from a parental guarantee provided by HCC Insurance Holdings, Inc.

Capital planning activities consider current and anticipated changes in the Group's risk profile, such as those reflected in its three-year business plan, and forecast the related impact on capital. As part of its capital planning, the Group integrates projected capital needs with its business planning and financial forecasting processes.

To ensure the maintenance of appropriate capital level at all times, the Group has defined a specific capital risk appetite with thresholds and limits that trigger actions, including the source of capital and/or associated corrective actions. These appetites have been developed in line with regulatory requirements under the Solvency II regime whilst also including an appropriate level of prudence over and above minimum levels. These are monitored through the Risk, Capital & Compliance Committee on a regular basis.

Own Funds are comprised of items on the balance sheet, which are referred to as basic Own Funds consisting of paid-up ordinary share capital, and a reconciliation reserve.

### E1 – Own Funds

#### Group Own Funds

At the valuation date, the Own Funds held by the Group were \$1,308 million (2022: \$1,035 million). All Own Funds qualify as Tier 1 capital and are unrestricted, so are eligible to meet the SCR and Minimum Consolidation Group SCR. The Group's common equity consisted of share capital totalling \$207 million (2022: \$207 million) and retained earnings and other reserves totalling \$1,102 million (2022: \$828 million). Other reserves and retained earnings are not separately disclosed in Own Funds. They are notionally included in the reconciliation reserve, which reconciles the total excess of assets over liabilities with identifiable capital instruments included in Own Funds. The table below sets out the constituent parts of the reconciliation reserve:

RECONCILIATION RESERVE		
\$'000	2023	2022
Excess of assets over liabilities	1,308,445	1,034,763
Own share capital	(206,735)	(206,735)
<b>Reconciliation reserve</b>	<b>1,101,710</b>	<b>828,028</b>

There are no restrictions to the fungibility and transferability of Own Funds eligible to cover the Group SCR, with all Own Funds items issued by the parent company. For the purposes of the Group Own Funds, these have been calculated using fully consolidated data, other than Qdos and GCube, as mentioned within Section A1. Intra-group transactions, primarily in relation to ancillary services companies such as HCC Credit Services Limited have been consolidated on a line-by-line basis.

The classification into tiers is relevant for the determination of Own Funds that are eligible for covering the SCR and the regulatory minimum consolidated group SCR.



The table below represents the ratios of eligible Own Funds that the Group holds to cover the SCR and the minimum consolidated group SCR:

Eligible Own Funds to cover capital requirements \$'000	2023	2022
Eligible II Own Funds	1,308,445	1,034,763
SCR	905,806	896,827
Minimum consolidated group SCR	270,468	245,122
Excess Own Funds over SCR (surplus)	402,639	137,936
Eligible Own funds to meet MCR	1,037,977	789,641
Coverage ratio (Own Funds/SCR)	144%	115%
Own Funds as a percentage of Minimum Consolidated Group SCR	484%	422%

Eligible Own Funds have increased in the year to \$1,308 million (2022: \$1,035 million) representing a coverage ratio of 144% (2022: 115%). The growth in both the Group's and the Company's Own Funds in 2023 is predominantly due to underwriting profits, unrealised gains and investment income within the year, driving a higher coverage ratio. The SCR has remained relatively consistent with 2022, as increased Underwriting risk has been offset by higher Loss-Absorbing Capacity of Deferred Tax credit.

### Company Own Funds

At 31 December 2023, the Own Funds held by the Company were \$1,300 million (2022: \$1,031 million); all Own Funds qualify as Tier 1 capital and are unrestricted, so are eligible to meet the SCR and MCR. The Company's common equity consisted of share capital totalling \$233 million (2022: \$233 million), share premium of \$19 million (2022: \$19 million) and retained earnings and other reserves totalling \$1,048 million (2022: \$772 million).

RECONCILIATION RESERVE \$'000	2023	2022
Excess of assets over liabilities	1,300,115	1,030,625
less:		
Own share capital	233,242	233,242
Share premium	19,115	19,115
Deferred tax asset	-	5,999
<b>Reconciliation reserve</b>	<b>1,047,758</b>	<b>772,269</b>

### Company Eligible Own Funds

The classification into tiers is relevant for the determination of Own Funds that are eligible for covering the SCR and the regulatory MCR. At least 80% of the MCR must be covered by Tier 1 capital and Tier 3 capital is not eligible to cover the MCR at all. The table below represents for the SCR and MCR with respect to tiers:

The table below represents the ratio of eligible Own Funds that the company holds to cover the SCR and MCR:

Eligible Own Funds to cover capital requirements \$'000	2023	2022
Eligible Own Funds	1,300,115	1,030,625
SCR	738,072	712,683
MCR	216,962	198,475
Eligible Own Funds over SCR (surplus)	562,043	317,942
Eligible Own funds to meet MCR over MCR	1,083,153	826,151
Coverage ratio (Own Funds/SCR)	176%	145%
Eligible Own Funds to meet MCR as a percentage of MCR	599%	516%

Coverage ratio has increased to 176% from 145% during the year. The growth in both the Group's and the Company's Own Funds in 2023 is predominantly due to underwriting profits, unrealised gains and investment income within the year, driving a higher coverage ratio. The SCR has remained relatively consistent with 2022, as increased Underwriting risk has been offset by higher Loss-Absorbing Capacity of Deferred Tax credit.

### Material differences between equity in the financial statements and the excess of assets over liabilities

Assets and liabilities are calculated differently between Solvency II and UK GAAP resulting in reclassifications and differences in valuation including:

- DAC is not recognised under Solvency II;
- Intangibles and goodwill are disallowed;
- Technical provisions are calculated on a discounted best estimate basis;
- Deferred tax changes due to valuation differences under Solvency II.

The differences arising from the change in valuation are reported in the table below:

EXCESS OF ASSETS OVER LIABILITIES - ATTRIBUTION OF VALUATION DIFFERENCES	Group	Company
\$'000	2023	2023
<b>Total of reserves and retained earnings from financial statements</b>	<b>1,193,264</b>	<b>1,266,576</b>
Arising from Solvency II asset valuations	(665,660)	(457,382)
Arising from Solvency II technical provisions	801,491	521,231
Arising from Solvency II other liabilities	(20,650)	(30,310)
<b>Excess assets over liabilities</b>	<b>1,308,445</b>	<b>1,300,115</b>

## E2 – Solvency Capital Requirements and Minimum Capital Requirements

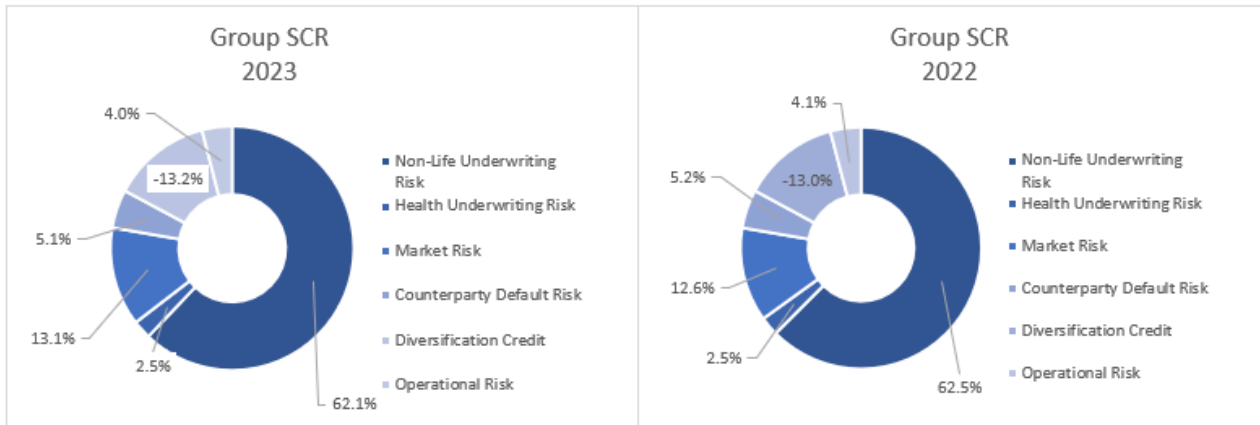
### Group Solvency Requirement

At 31 December 2023, the Group SCR was \$906 million (2022: \$897 million). The SCR is calculated as set out in Article 336 of the Delegated Acts, using fully consolidated data throughout.

The Group has assessed and confirmed the appropriateness of the SCR as calculated using the Standard Formula.

The SCR's key Risk Modules for the Group are set out in the table below and shown in the table and diagram below:

Capital Requirement for each risk module	2023	2022
Net SCR	\$'000	\$'000
Non-life underwriting risk	874,520	769,226
Health underwriting risk	34,758	31,152
Market risk	184,544	155,087
Counterparty default risk	71,750	63,725
Diversification credit	(185,923)	(160,232)
Operational risk	56,138	50,514
Pre-deferred tax Standard Formula SCR	1,035,787	909,472
Loss absorbing capacity of deferred tax	(129,981)	(12,645)
<b>Final SCR</b>	<b>905,806</b>	<b>896,827</b>



The 2023 breakdown of the SCR into its underlying risk categories remains broadly similar to 2022. The marginal growth in the SCR in 2023 reflects the impact of Loss-Absorbing Capacity of Deferred Taxes of increased profits, offsetting the increase in Non-Life Underwriting risk. An increase in market risk is driven by increased future cash flows on the interest rate risk sub-module due to growth in the bond portfolio.

The diversification ratio between risk modules of the Basic SCR at 31 December 2023 is 16% (2022: 16%). This represents the diversification between risk components and is driven by the relative size of each risk module and the correlations between them. The level of diversification benefit is checked against the Group's validated economic capital model to confirm its appropriateness.

The increase in the Group Minimum Consolidated Group SCR to \$270 million (2022: \$245 million) is driven by an increase in business volumes (net written premiums) and reserves (net best estimate), with details being found in Sections A and D, respectively.

Overall Minimum Consolidated SCR	2023	2022
	\$'000	\$'000
Linear Minimum Consolidated Group SCR	270,468	245,122
SCR	905,806	896,827
Minimum Consolidated Group SCR cap	407,613	403,572
Minimum Consolidated Group SCR floor	226,452	224,207
Combined Minimum Consolidated Group SCR	270,468	245,122
Absolute floor of the Minimum Consolidated Group SCR	4,415	4,271
<b>Minimum Consolidated Group SCR</b>	<b>270,468</b>	<b>245,122</b>

There have been no periods of non-compliance or material changes with the SCR or the Minimum Consolidated Group SCR during the year.

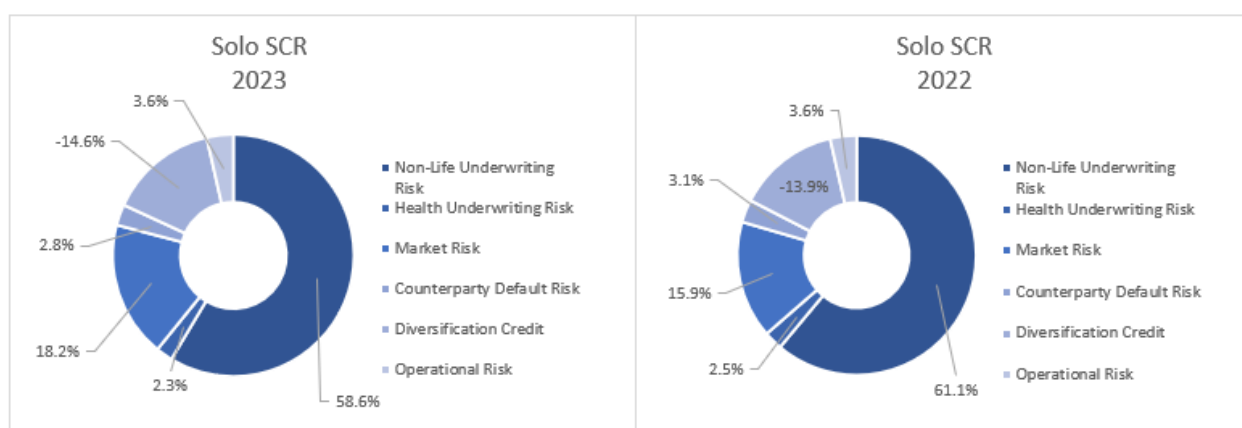
### Company Solvency Requirement

At 31 December 2023, the SCR of the Company is \$738 million (2022: \$713 million). The SCR is calculated using the Standard Formula. The Company does not apply any simplifications or undertaking specific parameters in the calculation.

The Company has assessed and confirmed the appropriateness of the SCR as calculated using the Standard Formula.

The SCR's key Risk Modules for the Company are set out in the table and diagram below:

Capital Requirement for each Risk Module \$'000	Net SCR 2023	Net SCR 2022
Non-life underwriting risk	682,235	606,676
Health underwriting risk	26,242	25,028
Market risk	211,920	157,607
Counterparty default risk	32,577	30,544
Diversification credit	(169,852)	(137,539)
Operational risk	41,334	35,530
Pre-deferred tax SCR	824,456	717,846
Loss absorbing capacity of deferred tax	(86,384)	(5,163)
<b>Final Standard Formula SCR</b>	<b>738,072</b>	<b>712,683</b>



The 2023 breakdown of the SCR into its underlying risk categories remains broadly similar to 2022. The marginal growth in the SCR in 2023 is driven by the increase in Non-Life Underwriting risk due to the impact of increased budgeted premiums, offset by the impact on Loss-Absorbing Capacity of Deferred Tax of increased profits. An increase in market risk is driven by increased future cash flows on the interest rate risk sub-module due to growth in the bond portfolio.

The diversification ratio between risk modules of the Basic SCR at 31 December 2023 is 18% (2022: 17%). This represents the diversification between risk components and is driven by the relative size of each risk module and the correlations between them. The level of diversification benefit is checked against the Company's validated economic capital model to confirm its appropriateness.

The increase in the Company's MCR to \$217 million from \$198 million is driven by an increase in business volumes (net written premiums) and reserves (net best estimate), with details being found in Sections A and D, respectively.

Overall Minimum Consolidated SCR	2023 \$'000	2022 \$'000
Linear MCR	216,962	198,475
SCR	738,072	712,683
MCR cap	332,132	320,707
MCR floor	184,518	178,171
Combined MCR	216,962	198,475
Absolute floor of the MCR	4,415	4,271
<b>MCR</b>	<b>216,962</b>	<b>198,475</b>

### ***E3 – Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement***

The duration-based equity risk sub-module is not used in the calculation of the SCR for either the Group or the Company.

### ***E4 – Differences between the standard formula and any internal model used***

Not applicable.

### ***E5 – Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement***

There were no instances of non-compliance with the MCR or SCR for the Company, or with the Minimum Consolidated Group SCR or SCR for Group, during the year.

### ***E6 – Any other information***

#### **Undertaking-specific parameters and matching adjustments**

The Group does not have any Undertaking-specific parameters or a matching adjustment.

#### **Other material information for capital management**

The Group does not consider any other material information for managing capital.

#### **Simplified calculation in the Standard Formula**

No material simplifications are used in calculating the Standard Formula.

#### **Share Capital**

No share capital was issued during 2023 or 2022.

#### **Dividend**

During the year, the Group and Company have paid no dividends (2022: \$115 million).

The Directors recommend a final dividend of 90 US Cents per ordinary share for the year ended 31 December 2023. Subject to approval by shareholders of the recommended final dividend, the dividend to shareholders for 2023 will total \$150 million (2022: \$nil).

If approved, HCCII will pay the final dividend on 28 June 2024 to shareholders on the register of members at 8 April 2024.

As this is subject to approval by the shareholders, at submission date, no adjustment has been made to Group SFCR.

## Directors' Report

### Company Directors

The directors set out below have held office from 1 January 2023 to the date of this report unless otherwise stated:

A M Baker  
S A Button  
B J Cook (Chief Executive Officer)  
P Engelberg (appointed 1 January 2023)  
T J G Hervy  
K L Letsinger  
N C Marsh (Non-Executive Chair)  
H Mishima (resigned 1 April 2024)  
H-D Rohlf (Non-Executive) (resigned 30 April 2023)  
C Scarr (Non-Executive)  
K Shimizu  
G R A White

### Statement of Company Directors' Responsibilities

We acknowledge our responsibility for preparing the Company SFCR in all material respects in accordance with the PRA Rules and the Solvency II Regulations.

We are satisfied that:

- a) throughout the financial year in question, HCC International Insurance Company plc (the Company) has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable to the insurer: and
- b) it is reasonable to believe that the Company has continued so to comply subsequently and will continue so to comply in the future.

### Group Directors

The directors set out below have held office from 1 January 2023 to the date of this report unless otherwise stated:

B J Cook (Chair)  
K L Letsinger  
T Weist

### Statement of Group Directors' Responsibilities

We acknowledge our responsibility for preparing the Group SFCR in all material respects in accordance with the PRA Rules and the Solvency II Regulations.

We are satisfied that:

- a) throughout the financial year in question, the Tokio Marine HCC Insurance Holdings (International) Limited Group (the Group) has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable at the level of the group: and
- b) it is reasonable to believe that the Group has continued so to comply subsequently and will continue so to comply in future.

On behalf of the Boards,

DocuSigned by:



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K L Letsinger

**Group Chief Financial Officer**

5 April 2023

**Report of the external independent auditors to the Directors of Tokio Marine HCC Insurance Holdings (International) Limited ('the Company') pursuant to Rule 4.1 (2) of the External Audit Part of the PRA Rulebook applicable to Solvency II firms**

**Report on the Audit of the relevant elements of the Single Group-Wide Solvency and Financial Condition Report**

**Opinion**

We have audited the following documents prepared by the Company as at 31 December 2023:

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Single Group-Wide Solvency and Financial Condition Report of the Company as at 31 December 2023, (**'the Narrative Disclosures subject to audit'**);
- Group templates S.02.01.02, S.23.01.22, S.25.01.22 and S.32.01.22 (**'the Group Templates subject to audit'**); and
- Solo templates S.02.01.02, S.17.01.02, S.23.01.01, S.25.01.21 and S.28.01.01 in respect of HCC International Insurance Company PLC (**'the Solo Templates subject to audit'**)

The Narrative Disclosures subject to audit, the Group Templates subject to audit and the Solo Templates subject to audit are collectively referred to as the **'relevant elements of the Single Group-Wide Solvency and Financial Condition Report'**.

We are not required to audit, nor have we audited, and as a consequence do not express an opinion on the **Other Information** which comprises:

- The 'Summary', 'Business and performance', 'System of governance' and 'Risk profile' elements of the Single Group-Wide Solvency and Financial Condition Report;
- Group templates S.05.01.02 and S.05.02.01 and Solo templates S.05.01.02, S.05.02.01 and S.19.01.21; and
- The written acknowledgement by management of their responsibilities, including for the preparation of the Single Group-Wide Solvency and Financial Condition Report (**'the Responsibility Statement'**);

In our opinion, the information subject to audit in the relevant elements of the Single Group-Wide Solvency and Financial Condition Report of the Company as at 31 December 2023 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals and determinations.

**Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) including ISA (UK) 800 and ISA (UK) 805, and applicable law. Our responsibilities under those standards are further described in the *Auditors' Responsibilities for the Audit of the relevant elements of the Single Group-Wide Solvency and Financial Condition Report* section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the Single Group-Wide Solvency and Financial Condition Report in the UK, including the FRC's Ethical Standard as applied to public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

**Conclusions relating to going concern**

Our evaluation of the Directors' assessment of the Company's ability to continue to adopt the going concern basis of accounting included:

- Obtaining and assessing the reasonableness of the Directors' assessment, taking into consideration the Group and Company's year-end investment portfolio and its exposure to certain types of assets, cash flows and liquidity analysis and operational resilience;
- Considering management's assessment of the regulatory Solvency coverage and liquidity position;
- Considering information obtained during the course of the audit and publicly available market information to identify any evidence that would contradict management's assessment of going concern
- Inquiring and auditing actions taken by management to mitigate the impacts of economic uncertainty including review of Risk and Capital Management Committee minutes and attendance of all Audit Committees; and

- Assessing the appropriateness of disclosure made by management in the Directors' Report regarding the Group and Company's ability to continue as a going concern for at least 12 months from the date of approval of these financial statements.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of at least twelve months from the date on which the Single Group-Wide Solvency and Financial Condition Report is authorised for issue.

In auditing the Single Group-Wide Solvency and Financial Condition Report, we have concluded that the Directors' use of the going concern basis of accounting in the preparation of the Single Group-Wide Solvency and Financial Condition Report is appropriate.

However, because not all future events or conditions can be predicted, this conclusion is not a guarantee as to the Company's ability to continue as a going concern.

Our responsibilities and the responsibilities of the Directors with respect to going concern are described in the relevant sections of this report.

### **Emphasis of Matter - Basis of Accounting**

We draw attention to the 'Valuation for solvency purposes' and 'Capital Management' of the Single Group-Wide Solvency and Financial Condition Report, which describe the basis of accounting. The Single Group-Wide Solvency and Financial Condition Report is prepared in compliance with the financial reporting provisions of the PRA Rules and Solvency II regulations, and therefore in accordance with a special purpose financial reporting framework. The Single Group-Wide Solvency and Financial Condition Report is required to be published, and intended users include but are not limited to the Prudential Regulation Authority. As a result, the Single Group-Wide Solvency and Financial Condition Report may not be suitable for another purpose. Our opinion is not modified in respect of this matter.

### **Other Information**

The Directors are responsible for the Other Information.

Our opinion on the relevant elements of the Single Group-Wide Solvency and Financial Condition Report does not cover the Other Information and we do not express an audit opinion or any form of assurance conclusion thereon.

In connection with our audit of the Single Group-Wide Solvency and Financial Condition Report, our responsibility is to read the Other Information and, in doing so, consider whether the Other Information is materially inconsistent with the relevant elements of the Single Group-Wide Solvency and Financial Condition Report, or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the relevant elements of the Single Group-Wide Solvency and Financial Condition Report or a material misstatement of the Other Information. If, based on the work we have performed, we conclude that there is a material misstatement of this Other Information, we are required to report that fact. We have nothing to report in this regard.

### **Responsibilities of Directors for the Single Group-Wide Solvency and Financial Condition Report**

The Directors are responsible for the preparation of the Single Group-Wide Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations, which have been modified by the modifications, and supplemented by the approvals and determinations made by the PRA under section 138A of FSMA, the PRA Rules and Solvency II regulations on which they are based, as detailed below:

1. Permission to exclude entities from the scope of group supervision; and
2. Permission to publish a Single Group-Wide Solvency and Financial Condition Report

The Directors are also responsible for such internal control as they determine is necessary to enable the preparation of a Single Group-Wide Solvency and Financial Condition Report that is free from material misstatement, whether due to fraud or error.

### **Auditors' Responsibilities for the Audit of the relevant elements of the Single Group-Wide Solvency and Financial Condition Report**

It is our responsibility to form an independent opinion as to whether the information subject to audit in the relevant elements of the Single Group-Wide Solvency and Financial Condition Report is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.



Our objectives are to obtain reasonable assurance about whether the relevant elements of the Single Group-Wide Solvency and Financial Condition Report are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decision making or the judgement of the users taken on the basis of the Single Group-Wide Solvency and Financial Condition Report.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud, is detailed below.

Based on our understanding of the Company/industry, we identified that the principal risks of non-compliance with laws and regulations related to breaches of UK regulatory principles, and we considered the extent to which non-compliance might have a material effect on the Single Group-Wide Solvency and Financial Condition Report. We also considered those laws and regulations that have a direct impact on the Single Group-Wide Solvency and Financial Condition Report such as the Solvency II Directive, Delegated Acts and EIOPA's reporting and disclosure guidelines. We evaluated management's incentives and opportunities for fraudulent manipulation of the Single Group-Wide Solvency and Financial Condition Report (including the risk of override of controls), and determined that the principal risks were related to management override of controls, including manual journals and the potential for management bias in significant accounting estimates, particularly in relation to the valuation of Technical Provisions. Audit procedures performed included:

- Discussions with the Board, management, internal audit, senior management involved in the Risk and Compliance functions and Group's legal function, including consideration of known or suspected instances of non-compliance with laws and regulation and fraud;
- Testing and challenging where appropriate the assumptions and judgements made by management in their significant accounting estimates, particularly in relation to the valuation of Technical Provisions;
- Assessing matters reported on the Group's whistleblowing helpline and fraud register and the results of management's investigation of such matters;
- Reading key correspondence with the Prudential Regulation Authority and the Financial Conduct Authority in relation to compliance with relevant laws and regulations;
- Reviewing relevant meeting minutes including those of the Audit Committee;
- Identifying and testing journal entries, in particular any journal entries posted with unusual account combinations or posted by unexpected users;
- Designing audit procedures to incorporate unpredictability around the nature, timing or extent of our testing; and
- Testing any transactions entered into outside of the normal course of the Group's business.

There are inherent limitations in the audit procedures described above. We are less likely to become aware of instances of non-compliance with laws and regulations that are not closely related to events and transactions reflected in the Single Group-Wide Solvency and Financial Condition Report. Also, the risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion.

A further description of our responsibilities for the audit is located on the Financial Reporting Council's website at: [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of our auditors' report.

#### **Use of this report**

This report, including the opinion, has been prepared for the Board of Directors of the Company in accordance with External Audit rule 2.1 of the Solvency II firms Sector of the PRA Rulebook and for no other purpose. We do not, in providing this report, accept or assume responsibility for any other purpose or to any other party save where expressly agreed by our prior consent in writing.

#### **Report on Other Legal and Regulatory Requirements**

##### **Sectoral Information**

In our opinion, in accordance with Rule 4.2 of the External Audit Part of the PRA Rulebook, the sectoral information has been properly compiled in accordance with the PRA rules and UK Law relating to that undertaking from information provided by members of the group and the relevant insurance group undertaking.

**Other Information**

In accordance with Rule 4.1 (3) of the External Audit Part of the PRA Rulebook for Solvency II firms we are also required to consider whether the Other Information is materially inconsistent with our knowledge obtained in the audit of the Company's statutory financial statements. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

A rectangular box containing a handwritten signature in black ink that reads "PricewaterhouseCoopers LLP".

*PricewaterhouseCoopers LLP*

*Chartered Accountants*

*7 More London Riverside, London*

5 April 2024

## Section F – ANNEX: Quantitative Reporting Templates

This Annex lists the annual QRTs submitted to the PRA on behalf the Group and the Company in respect of the year ended 31 December 2023.

The following QRTs are presented in this annex:

Form	Description	HCCII (Company)	TMHCCI(H) (Group)
S.02.01.02	Balance Sheet	✓	✓
<b>S.05.01.02</b>	<b>Premiums, claims and expenses by LOB</b>	✓	✓
S.05.02.01	Premiums, claims and expenses by country	✓	✓
<b>S.17.01.02</b>	<b>Non-Life Technical Provisions</b>	✓	
S.19.01.21	Non-Life insurance claims	✓	
<b>S.23.01.01</b>	<b>Own funds</b>	✓	
S.23.01.22	Own funds		✓
<b>S.25.01.21</b>	<b>SCR for undertakings on Standard Formula</b>	✓	
S.25.01.22	SCR for groups on Standard Formula		✓
<b>S.28.01.01</b>	<b>MCR – Only Life or Non-Life insurance or reinsurance activity</b>	✓	

## Company Quantitative Reporting Templates

### S.02.01.02

Balance Sheet

Amounts in \$'000

		Solvency II value
		C0010
<b>Assets</b>		
Goodwill	R0010	-
Deferred acquisition costs	R0020	-
Intangible assets	R0030	-
Deferred tax assets	R0040	-
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	5,663
<b>Investments (other than assets held for index-linked and unit-linked contracts)</b>	<b>R0070</b>	<b>2,501,549</b>
Property (other than for own use)	R0080	55
Holdings in related undertakings, including participations	R0090	327,791
<i>Equities</i>	<i>R0100</i>	-
Equities - listed	R0110	-
Equities - unlisted	R0120	-
<i>Bonds</i>	<i>R0130</i>	<i>1,859,994</i>
Government Bonds	R0140	411,013
Corporate Bonds	R0150	1,059,687
Structured notes	R0160	-
Collateralised securities	R0170	389,293
Collective Investments Undertakings	R0180	161,339
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	151,770
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
<b>Loans and mortgages</b>	<b>R0230</b>	<b>-</b>
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
<b>Reinsurance recoverables from:</b>	<b>R0270</b>	<b>366,076</b>
Non-life and health similar to non-life	R0280	366,076
Non-life excluding health	R0290	343,690
Health similar to non-life	R0300	22,387
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	22,239
Reinsurance receivables	R0370	-
Receivables (trade, not insurance)	R0380	107,369
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	49,793
Any other assets, not elsewhere shown	R0420	0.00
<b>Total assets</b>	<b>R0500</b>	<b>3,052,689</b>

**S.02.01.02**

Balance Sheet

Amounts in \$'000

**Liabilities**

<b>Technical provisions – non-life</b>	<b>R0510</b>	<b>1,433,077</b>
<b>Technical provisions – non-life (excluding health)</b>	<b>R0520</b>	<b>1,367,181</b>
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	1,313,683
Risk margin	R0550	53,498
<b>Technical provisions – health (similar to non-life)</b>	<b>R0560</b>	<b>65,896</b>
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	64,139
Risk margin	R0590	1,758
<b>Technical provisions – life (excluding index-linked and unit-linked)</b>	<b>R0600</b>	<b>-</b>
<b>Technical provisions – health (similar to life)</b>	<b>R0610</b>	<b>-</b>
Technical provisions calculated as a whole	R0620	-
Best estimate	R0630	-
Risk margin	R0640	-
<b>Technical provisions – life (excluding health and index-linked and unit-linked)</b>	<b>R0650</b>	<b>-</b>
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	-
Risk margin	R0680	-
<b>Technical provisions – index-linked and unit-linked</b>	<b>R0690</b>	<b>-</b>
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	-
Risk margin	R0720	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	-
Pension benefit obligations	R0760	-
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	54,656
Derivatives	R0790	-
<b>Debts owed to credit institutions</b>	<b>R0800</b>	<b>-</b>
Debts owed to credit institutions resident domestically	ER0801	-
Debts owed to credit institutions resident in the euro area other than domestic	ER0802	-
Debts owed to credit institutions resident in rest of the world	ER0803	-
<b>Financial liabilities other than debts owed to credit institutions</b>	<b>R0810</b>	<b>-</b>
debts owed to non-credit institutions	ER0811	-
debts owed to non-credit institutions resident domestically	ER0812	-
debts owed to non-credit institutions resident in the euro area other than domestic	ER0813	-
debts owed to non-credit institutions resident in rest of the world	ER0814	-
other financial liabilities (debt securities issued)	ER0815	-
Insurance & intermediaries payables	R0820	11,917
Reinsurance payables	R0830	41,508
Payables (trade, not insurance)	R0840	-
<b>Subordinated liabilities</b>	<b>R0850</b>	<b>-</b>
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	211,416
<b>Total liabilities</b>	<b>R0900</b>	<b>1,752,574</b>
<b>Excess of assets over liabilities</b>	<b>R1000</b>	<b>1,300,115</b>

**S.05.01.02**

Premiums Claims and Expenses by Line of Business

Non-Life (direct business/ accepted proportional and accepted non – proportional reinsurance)

Amounts in \$'000

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												
	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120
<b>Premiums written</b>												
Gross - Direct Business	R0110	277	5,815	29,638	-	-	79,182	153,303	315,139	180,222	628	11,214
Gross - Proportional reinsurance accepted	R0120	-	73	-	-	-	6,668	28,862	105,174	-	2,331	16
Gross - Non-proportional reinsurance accepted	R0130	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0140	184	3,352	4,214	-	-	31,234	48,654	78,776	37,584	31	9,199
<b>Net</b>	<b>R0200</b>	<b>93</b>	<b>2,536</b>	<b>25,425</b>	<b>-</b>	<b>-</b>	<b>56,616</b>	<b>133,512</b>	<b>341,538</b>	<b>142,658</b>	<b>2,928</b>	<b>2,031</b>
<b>Premiums earned</b>												
Gross - Direct Business	R0210	196	5,248	26,722	-	-	81,722	151,938	320,547	172,236	661	9,510
Gross - Proportional reinsurance accepted	R0220	-	243	-	-	-	8,077	21,438	111,122	-	1,979	16
Gross - Non-proportional reinsurance accepted	R0230	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0240	178	2,726	4,246	-	-	32,844	49,614	85,112	30,727	31	7,699
<b>Net</b>	<b>R0300</b>	<b>18</b>	<b>2,765</b>	<b>22,475</b>	<b>-</b>	<b>-</b>	<b>56,955</b>	<b>123,882</b>	<b>346,556</b>	<b>141,509</b>	<b>2,610</b>	<b>1,828</b>
<b>Claims incurred</b>												
Gross - Direct Business	R0310	202	6,057	13,987	-	-	20,727	89,448	169,275	94,908	61	(16,540)
Gross - Proportional reinsurance accepted	R0320	-	1,217	-	-	-	3,314	57	69,642	-	178	(2)
Gross - Non-proportional reinsurance accepted	R0330	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0340	(7)	5,613	1,898	-	-	13,001	28,066	76,027	30,796	20	(7,222)
<b>Net</b>	<b>R0400</b>	<b>209</b>	<b>1,661</b>	<b>12,089</b>	<b>-</b>	<b>-</b>	<b>11,040</b>	<b>61,439</b>	<b>162,890</b>	<b>64,112</b>	<b>219</b>	<b>(9,320)</b>
<b>Changes in other technical provisions</b>												
Gross - Direct Business	R0410	-	-	-	-	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	R0420	-	-	-	-	-	-	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	R0430	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0440	-	-	-	-	-	-	-	-	-	-	-
<b>Net</b>	<b>R0500</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Expenses incurred</b>	<b>R0550</b>	<b>29</b>	<b>2,196</b>	<b>11,205</b>	<b>-</b>	<b>-</b>	<b>17,586</b>	<b>60,409</b>	<b>121,255</b>	<b>55,563</b>	<b>-</b>	<b>268</b>
<b>Other expenses</b>	<b>R1200</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,317</b>	<b>-</b>
<b>Total expenses</b>	<b>R1300</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,317</b>	<b>268</b>

**S.05.01.02**

## Premiums Claims and Expenses by Line of Business

Non-Life (direct business/ accepted proportional and accepted non – proportional reinsurance)

Amounts in \$'000

		Line of Business for: accepted non-proportional reinsurance				Total
		Health	Casualty	Marine, aviation, transport	Property	
		C0130	C0140	C0150	C0160	
<b>Premiums written</b>						
Gross - Direct Business	R0110					775,420
Gross - Proportional reinsurance accepted	R0120					145,125
Gross - Non-proportional reinsurance accepted	R0130	11,561	19,314	82,048	219,331	332,253
Reinsurers' share	R0140	1,041	6,612	35,420	82,573	338,853
<b>Net</b>	<b>R0200</b>	<b>10,520</b>	<b>12,702</b>	<b>46,628</b>	<b>136,757</b>	<b>913,944</b>
<b>Premiums earned</b>						
Gross - Direct Business	R0210					768,840
Gross - Proportional reinsurance accepted	R0220					142,935
Gross - Non-proportional reinsurance accepted	R0230	11,063	21,111	78,061	207,780	318,015
Reinsurers' share	R0240	1,163	6,934	35,209	78,474	334,956
<b>Net</b>	<b>R0300</b>	<b>9,900</b>	<b>14,177</b>	<b>42,853</b>	<b>129,306</b>	<b>894,835</b>
<b>Claims incurred</b>						
Gross - Direct Business	R0310					378,124
Gross - Proportional reinsurance accepted	R0320					74,405
Gross - Non-proportional reinsurance accepted	R0330	6,774	26,437	51,224	134,505	219,000
Reinsurers' share	R0340	1,195	7,717	5,288	24,389	187,379
<b>Net</b>	<b>R0400</b>	<b>5,580</b>	<b>18,780</b>	<b>45,936</b>	<b>109,517</b>	<b>484,150</b>
<b>Changes in other technical provisions</b>						
Gross - Direct Business	R0410					-
Gross - Proportional reinsurance accepted	R0420					-
Gross - Non-proportional reinsurance accepted	R0430	-	-	-	-	-
Reinsurers' share	R0440	-	-	-	-	-
<b>Net</b>	<b>R0500</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Expenses incurred</b>	<b>R0550</b>	<b>3,103</b>	<b>89</b>	<b>19,305</b>	<b>42,148</b>	<b>334,471</b>
<b>Other expenses</b>	<b>R1200</b>					
<b>Total expenses</b>	<b>R1300</b>					<b>334,471</b>

**S.05.02.01**

## Premiums Claims and Expenses by Country

Amounts in \$'000

		Total Top 5 and home country	Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					
		C0070	C0010	C0020	C0030	C0040	C0050	C0060	
R0010			United Kingdom (After Brexit)	United States of America (US)	Singapore (SG)	Australia (AU)	India (IN)	Switzerland (CH)	
		C0140	C0080	C0090	C0100	C0110	C0120	C0130	
<b>Premiums written</b>									
Gross - Direct Business	R0110	714,734	681,576	4,664	4,120	8,861	2,083	13,430	
Gross - Proportional reinsurance accepted	R0120	121,740	85,353	2,752	15,554	2	12,617	5,462	
Gross - Non-proportional reinsurance accepted	R0130	104,324	36,293	26,148	11,238	18,192	8,706	3,748	
Reinsurers' share	R0140	263,502	211,987	27,458	3,970	9,281	1,473	9,332	
<b>Net</b>	<b>R0200</b>	<b>677,297</b>	<b>591,235</b>	<b>6,107</b>	<b>26,941</b>	<b>17,774</b>	<b>21,932</b>	<b>13,308</b>	
<b>Premium earned</b>									
Gross - Direct Business	R0210	707,880	670,540	4,877	5,734	10,710	1,994	14,024	
Gross - Proportional reinsurance accepted	R0220	120,316	87,722	2,023	16,460	1	12,649	1,459	
Gross - Non-proportional reinsurance accepted	R0230	93,479	30,579	21,653	12,043	15,762	8,700	4,742	
Reinsurers' share	R0240	260,395	207,671	24,962	5,914	11,290	1,557	9,001	
<b>Net</b>	<b>R0300</b>	<b>661,279</b>	<b>581,170</b>	<b>3,591</b>	<b>28,324</b>	<b>15,184</b>	<b>21,787</b>	<b>11,224</b>	
<b>Claims incurred</b>									
Gross - Direct Business	R0310	346,991	329,670	987	4,476	5,342	191	6,325	
Gross - Proportional reinsurance accepted	R0320	56,441	41,678	382	6,715	11	5,858	1,797	
Gross - Non-proportional reinsurance accepted	R0330	100,383	63,376	20,894	9,108	418	3,460	3,127	
Reinsurers' share	R0340	178,692	166,893	3,304	3,591	2,051	1,140	1,713	
<b>Net</b>	<b>R0400</b>	<b>325,123</b>	<b>267,831</b>	<b>18,959</b>	<b>16,707</b>	<b>3,720</b>	<b>8,370</b>	<b>9,535</b>	
<b>Changes in other technical provisions</b>									
Gross - Direct Business	R0410								
Gross - Proportional reinsurance accepted	R0420								
Gross - Non-proportional reinsurance accepted	R0430								
Reinsurers' share	R0440								
<b>Net</b>	<b>R0500</b>								
<b>Expenses incurred</b>	<b>R0550</b>	<b>225,845</b>	<b>189,955</b>	<b>8,185</b>	<b>10,084</b>	<b>2,936</b>	<b>9,504</b>	<b>5,182</b>	
<b>Other expenses</b>	<b>R1200</b>								
<b>Total expenses</b>	<b>R1300</b>	<b>225,845</b>							



S.17.01.02

Non-Life Technical Provisions  
Amounts in \$'000

		Direct business and accepted proportional reinsurance											
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130
<b>Technical provisions calculated as a whole</b>	<b>R0010</b>												
Direct business	R0020												
Accepted proportional reinsurance business	R0030												
Accepted non-proportional reinsurance	R0040												
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050												
<b>Technical Provisions calculated as a sum of BE and RM</b>													
<b>Best estimate</b>													
<b>Premium provisions</b>													
Gross	R0060	8	(414)	6,006			(2,303)	(1,707)	(827)	8,010		(311)	705
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	293	45	595			8,176	(21,918)	(42,366)	(24,086)		4	4,563
<b>Net Best Estimate of Premium Provisions</b>	<b>R0150</b>	<b>(285)</b>	<b>(458)</b>	<b>5,411</b>			<b>(10,485)</b>	<b>20,210</b>	<b>41,539</b>	<b>32,095</b>		<b>(315)</b>	<b>(3,858)</b>
<b>Claims provisions</b>													
Gross	R0160	(74)	6,232	43,994			63,969	100,354	745,461	132,219		(18)	8,003
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	(170)	3,150	14,813			25,117	8,884	182,820	34,433		461	6,225
<b>Net Best Estimate of Claims Provisions</b>	<b>R0250</b>	<b>95</b>	<b>3,082</b>	<b>29,180</b>			<b>38,852</b>	<b>91,470</b>	<b>562,641</b>	<b>97,786</b>		<b>(479)</b>	<b>1,778</b>
<b>Total Best estimate - gross</b>	<b>R0260</b>	<b>(67)</b>	<b>5,818</b>	<b>50,000</b>			<b>61,660</b>	<b>98,647</b>	<b>744,634</b>	<b>140,229</b>		<b>(328)</b>	<b>6,708</b>
<b>Total Best estimate - net</b>	<b>R0270</b>	<b>(190)</b>	<b>2,623</b>	<b>34,591</b>			<b>28,367</b>	<b>111,680</b>	<b>604,180</b>	<b>129,881</b>		<b>(794)</b>	<b>(2,081)</b>
<b>Risk margin</b>	<b>R0280</b>	<b>2</b>	<b>119</b>	<b>1,426</b>			<b>1,590</b>	<b>3,335</b>	<b>35,483</b>	<b>4,347</b>		<b>2</b>	<b>56</b>
<b>Amount of the transitional on Technical Provisions</b>													
Technical Provisions calculated as a whole	R0290												
Best estimate	R0300												
Risk margin	R0310												
<b>Technical Provisions</b>													
Technical provisions - total	R0320	(65)	5,938	51,426			63,250	102,582	780,117	144,576		(327)	8,764
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	123	3,195	15,408			33,293	(13,034)	140,454	10,348		465	10,789
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	R0340	(189)	2,743	36,017			29,957	115,615	639,663	134,228		(792)	(2,025)

**S.17.01.02**

## Non-Life Technical Provisions

Amounts in \$'000

		Accepted non-proportional reinsurance:				Total Non-Life obligations
		Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0140	C0150	C0160	C0170	C0180
<b>Technical provisions calculated as a whole</b>	<b>R0010</b>					
Direct business	R0020					
Accepted proportional reinsurance business	R0030					
Accepted non-proportional reinsurance	R0040					
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050					
<b>Technical Provisions calculated as a sum of BE and RM</b>						
<b>Best estimate</b>						
<b>Premium provisions</b>						
Gross	R0060	(440)	16,884	(13,470)	(59,219)	(47,085)
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	157	(1,958)	(10,597)	(23,367)	(110,460)
<b>Net Best Estimate of Premium Provisions</b>	<b>R0150</b>	<b>(597)</b>	<b>16,842</b>	<b>(2,872)</b>	<b>(35,851)</b>	<b>63,375</b>
<b>Claims provisions</b>						
Gross	R0160	8,828	49,732	138,734	127,474	1,424,906
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	3,503	17,003	93,013	87,282	476,536
<b>Net Best Estimate of Claims Provisions</b>	<b>R0250</b>	<b>5,324</b>	<b>32,728</b>	<b>45,721</b>	<b>40,192</b>	<b>948,370</b>
<b>Total Best estimate - gross</b>	<b>R0260</b>	<b>8,388</b>	<b>66,615</b>	<b>125,264</b>	<b>68,255</b>	<b>1,377,821</b>
<b>Total Best estimate - net</b>	<b>R0270</b>	<b>4,727</b>	<b>51,570</b>	<b>42,849</b>	<b>4,340</b>	<b>1,011,745</b>
<b>Risk margin</b>	<b>R0280</b>	211	3,103	2,547	2,435	55,256
<b>Amount of the transitional on Technical Provisions</b>						
Technical Provisions calculated as a whole	R0290					
Best estimate	R0300					
Risk margin	R0310					
<b>Technical Provisions</b>						
Technical provisions - total	R0320	8,598	69,718	127,811	70,690	1,433,077
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	3,660	15,045	82,415	63,915	366,076
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	R0340	4,938	54,673	45,396	6,775	1,067,001

**S.19.01.21**

Non-Life Insurance Claims  
Amounts in \$'000

**S.19.01.21.01**

Gross Claims Paid (non-cumulative) – Development Year (Absolute Amount)

		Development year										
		0	1	2	3	4	5	6	7	8	9	10 & +
<b>Gross Claims Paid (non-cumulative)</b>												
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100											
-9	R0160	10,038	30,679	40,481	31,754	8,227	51,056	14,162	16,007	2,789	10,534	
-8	R0170	10,940	40,617	51,135	21,194	57,211	22,482	36,018	20,120	2,124		
-7	R0180	24,687	78,138	44,547	38,657	4,136	15,030	58,588	15,074			
-6	R0190	9,886	53,284	45,047	46,709	21,649		19,565				
-5	R0200	30,016	73,565	38,861	15,399	2,607	26,004					
-4	R0210	9,801	97,646	53,632	31,937	28,445						
-3	R0220	7,758	71,548	40,331	48,061							
-2	R0230	8,403	73,728	56,650								
-1	R0240	12,089	77,083									
0	R0250	21,961										

**S.19.01.21.02**

Gross Claims Paid (non-cumulative) – Current year, Sum of years (Cumulative)

	In Current year	Sum of years (cumulative)
	C0170	C0180
R0100	637	637
R0160	10,534	215,727
R0170	2,124	261,841
R0180	15,074	278,858
R0190	19,565	205,428
R0200	26,004	186,453
R0210	28,445	221,461
R0220	48,061	167,698
R0230	56,650	138,780
R0240	77,083	89,173
R0250	21,961	21,961
<b>Total</b>	<b>314,188</b>	<b>2,499,690</b>

**S.19.01.21.03**

Gross Undiscounted Best Estimate Claims Provision (non-cumulative) – Development Year (Absolute Amount)

		Development year										
		0	1	2	3	4	5	6	7	8	9	10 & +
<b>Gross undiscounted Best Estimate Claims Provisions</b>												
		<b>C0200</b>	<b>C0210</b>	<b>C0220</b>	<b>C0230</b>	<b>C0240</b>	<b>C0250</b>	<b>C0260</b>	<b>C0270</b>	<b>C0280</b>	<b>C0290</b>	<b>C0300</b>
Prior	R0100											
-9	R0160	-	-	98,773	83,048	73,754	38,414	35,546	33,862	24,172	11,806	
-8	R0170	-	138,940	131,572	120,533	103,580	78,820	52,886	42,327	57,099		
-7	R0180	87,514	121,351	125,354	76,198	82,994	90,753	67,724	52,427			
-6	R0190	108,494	146,726	121,382	98,846	83,828	97,854	83,639				
-5	R0200	106,606	177,379	183,566	167,403	136,830	96,032					
-4	R0210	136,220	201,140	197,614	169,642	177,510						
-3	R0220	138,823	211,370	220,694	220,203							
-2	R0230	157,066	292,717	277,706								
-1	R0240	180,414	321,128									
0	R0250	200,802										

**S.19.01.21.04**

Gross Discounted Best Estimate Claims Provision - Current year, Sum of years (Cumulative)

		Year end (discounted data)
<b>C0360</b>		
	R0100	20,353
	R0160	11,098
	R0170	52,143
	R0180	48,849
	R0190	76,711
	R0200	86,980
	R0210	162,232
	R0220	200,247
	R0230	253,152
	R0240	292,928
	R0250	180,747
<b>Total</b>	R0260	<b>1,424,906</b>

**S.23.01.01**

## Own Funds

Amounts in \$'000

**S.23.01.01.01**

## Own Funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35</b>						
Ordinary share capital (gross of own shares)	R0010	233,242	233,242			
Share premium account related to ordinary share capital	R0030	19,115	19,115			
Undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	1,047,758	1,047,758			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
<b>Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds</b>						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
<b>Deductions</b>						
Deductions for participations in financial and credit institutions	R0230					
<b>Total basic own funds after deductions</b>	<b>R0290</b>	<b>1,300,115</b>	<b>1,300,115</b>			
<b>Ancillary own funds</b>						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual-type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 36(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 36(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 36(3) of the Directive 2009/138/EC	R0360					
2009/138/EC	R0370					
Other ancillary own funds	R0380					
<b>Total ancillary own funds</b>	<b>R0400</b>					
<b>Available and eligible own funds</b>						
<b>Total available own funds to meet the SCR</b>	<b>R0500</b>	<b>1,300,115</b>	<b>1,300,115</b>			
<b>Total available own funds to meet the MCR</b>	<b>R0510</b>	<b>1,300,115</b>	<b>1,300,115</b>			
<b>Total eligible own funds to meet the SCR</b>	<b>R0540</b>	<b>1,300,115</b>	<b>1,300,115</b>			
<b>Total eligible own funds to meet the MCR</b>	<b>R0550</b>	<b>1,300,115</b>	<b>1,300,115</b>			
SCR	R0580	738,072				
MCR	R0600	216,962				
Ratio of Eligible own funds to SCR	R0620	176%				
Ratio of Eligible own funds to MCR	R0640	599%				

**S.23.01.01.02**

		C0060
<b>Reconciliation reserve</b>		
Excess of assets over liabilities	R0700	1,300,115
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	252,356
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	1,047,758
<b>Expected profits</b>		
Expected profits included in future premiums (EPIFP) - Life Business	R0770	
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	192,062
<b>Total Expected profits included in future premiums (EPIFP)</b>	<b>R0790</b>	<b>192,062</b>

**S.25.01.21**

Solvency Capital Requirement – for undertakings on Standard Formula  
Amounts in \$'000

**S.25.01.21.01****Basic Solvency Capital Requirement**

		Net solvency capital requirement
		C0030
Market risk	R0010	211,920
Counterparty default risk	R0020	32,577
Life underwriting risk	R0030	-
Health underwriting risk	R0040	26,242
Non-life underwriting risk	R0050	682,235
Diversification	R0060	(163,852)
Intangible asset risk	R0070	-
<b>Basic Solvency Capital Requirement</b>	<b>R0100</b>	<b>783,121</b>

**S.25.01.21.02****Calculation of Solvency Capital Requirement**

		C0100
Adjustment due to RFF/IFAP nSCR aggregation	R0120	
Total capital requirement for operational risk	R0130	41,335
Loss-absorbing capacity of technical provisions	R0140	-
Loss-absorbing capacity of deferred taxes	R0150	(86,384)
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
<b>Solvency capital requirement excluding capital add-on</b>	<b>R0200</b>	<b>738,072</b>
Capital add-on already set	R0210	
<b>Solvency capital requirement</b>	<b>R0220</b>	<b>738,072</b>
<b>Solvency capital requirement</b>		<b>738,072</b>
<b>Other information on SCR</b>		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	
Method used to calculate the adjustment due to RFF/IFAP nSCR aggregation	R0450	4 - No adjustment
Net future discretionary benefits	R0460	

**Approach to tax rate**

		Yes/No
		C0109
Approach based on average tax rate	R0590	2 - No

**Calculation of loss absorbing capacity of deferred taxes**

		Before the shock	After the shock
		C0110	C0120
DTA	R0600		
DTA carry forward	R0610		
DTA due to deductible temporary differences	R0620		
DTL	R0630	54,656	206,244

**Calculation of loss absorbing capacity of deferred taxes**

		LAC DT
		C0130
LAC DT	R0640	-86,384
LAC DT justified by reversion of deferred tax liabilities	R0650	-
LAC DT justified by reference to probable future taxable economic profit	R0660	-
LAC DT justified by carry back, current year	R0670	-86,384
LAC DT justified by carry back, future years	R0680	-
Maximum LAC DT	R0690	-86,384

**S.28.01.01**

Minimum Capital Requirement – Only Life or Non- Life insurance or reinsurance activity  
Amounts in \$'000

**S.28.01.01.01**

Linear formula component for Non-Life insurance and reinsurance obligations

		Non-life activities	
		C0010	
<b>MCR<sub>NL</sub> Result</b>	<b>R0010</b>		216,962

**S.28.01.01.02**

Background information

MCR calculation Non Life		Non-life activities	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020	-	101
Income protection insurance and proportional reinsurance	R0030	2,623	3,589
Workers' compensation insurance and proportional reinsurance	R0040	34,591	8,768
Motor vehicle liability insurance and proportional reinsurance	R0050	-	-
Other motor insurance and proportional reinsurance	R0060	-	-
Marine, aviation and transport insurance and proportional reinsurance	R0070	28,367	49,311
Fire and other damage to property insurance and proportional reinsurance	R0080	111,680	144,690
General liability insurance and proportional reinsurance	R0090	604,180	218,722
Credit and suretyship insurance and proportional reinsurance	R0100	129,881	148,904
Legal expenses insurance and proportional reinsurance	R0110	-	-
Assistance and proportional reinsurance	R0120	-	1,717
Miscellaneous financial loss insurance and proportional reinsurance	R0130	-	5,362
Non-proportional health reinsurance	R0140	4,727	9,365
Non-proportional casualty reinsurance	R0150	51,570	8,293
Non-proportional marine, aviation and transport reinsurance	R0160	42,849	62,978
Non-proportional property reinsurance	R0170	4,340	108,216

**S.28.01.01.03**

Linear formula component for life insurance and reinsurance obligations

Linear formula component for life insurance and reinsurance obligations

MCR calculation Life		Life activities	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210		
Obligations with profit participation - future discretionary benefits	R0220		
Index-linked and unit-linked insurance obligations	R0230		
Other life (re)insurance and health (re)insurance obligations	R0240		
Total capital at risk for all life (re)insurance obligations	R0250		

**S.28.01.01.04**

Total capital at risk for all life (re)insurance obligations

		Non-life activities	
		C0010	
<b>MCR<sub>L</sub> Result</b>	<b>R0200</b>		

**S.28.01.01.05**

## Overall MCR calculation

<b>Overall MCR calculation</b>		<b>C0070</b>
Linear MCR	R0300	216,962
SCR	R0310	738,072
MCR cap	R0320	332,132
MCR floor	R0330	184,518
Combined MCR	R0340	216,962
Absolute floor of the MCR	R0350	4,415
		<b>C0070</b>
<b>Minimum Capital Requirement</b>	<b>R0400</b>	<b>216,962</b>



## Group Quantitative Reporting Templates

### S.02.01.02

Balance Sheet

Amounts in \$'000

		Solvency II value
		C0010
<b>Assets</b>		
Intangible assets	R0030	
Deferred tax assets	R0040	
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	7,417
<b>Investments (other than assets held for index-linked and unit-linked contracts)</b>	<b>R0070</b>	<b>2,690,234</b>
Property (other than for own use)	R0080	55
Holdings in related undertakings, including participations	R0090	14,003
<i>Equities</i>	<i>R0100</i>	
Equities - listed	R0110	
Equities - unlisted	R0120	
<i>Bonds</i>	<i>R0130</i>	<i>2,328,204</i>
Government Bonds	R0140	474,226
Corporate Bonds	R0150	1,430,094
Structured notes	R0160	-
Collateralised securities	R0170	421,884
Collective Investments Undertakings	R0180	166,153
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	183,819
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
<b>Loans and mortgages</b>	<b>R0230</b>	
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	
<b>Reinsurance recoverables from:</b>	<b>R0270</b>	<b>726,728</b>
Non-life and health similar to non-life	R0280	726,728
Non-life excluding health	R0290	684,601
Health similar to non-life	R0300	42,127
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	
Health similar to life	R0320	
Life excluding health and index-linked and unit-linked	R0330	
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	101,974
Reinsurance receivables	R0370	112,331
Receivables (trade, not insurance)	R0380	64,585
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	84,368
Any other assets, not elsewhere shown	R0420	493
<b>Total assets</b>	<b>R0500</b>	<b>3,788,190</b>

**S.02.01.02**

## Balance Sheet

Amounts in \$'000

**Liabilities**

<b>Technical provisions – non-life</b>	<b>R0510</b>	<b>1,935,182</b>
<b>Technical provisions – non-life (excluding health)</b>	<b>R0520</b>	<b>1,825,950</b>
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	1,765,092
Risk margin	R0550	60,858
<b>Technical provisions – health (similar to non-life)</b>	<b>R0560</b>	<b>109,232</b>
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	106,185
Risk margin	R0590	3,047
<b>Technical provisions – life (excluding index-linked and unit-linked)</b>	<b>R0600</b>	
<b>Technical provisions – health (similar to life)</b>	<b>R0610</b>	
Technical provisions calculated as a whole	R0620	
Best estimate	R0630	
Risk margin	R0640	
<b>Technical provisions – life (excluding health and index-linked and unit-linked)</b>	<b>R0650</b>	
Technical provisions calculated as a whole	R0660	
Best Estimate	R0670	
Risk margin	R0680	
<b>Technical provisions – index-linked and unit-linked</b>	<b>R0690</b>	
Technical provisions calculated as a whole	R0700	
Best Estimate	R0710	
Risk margin	R0720	
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	-
Pension benefit obligations	R0760	-
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	81,889
Derivatives	R0790	-
Debts owed to credit institutions	R0800	
Financial liabilities other than debts owed to credit institutions	R0810	
Insurance & intermediaries payables	R0820	43,103
Reinsurance payables	R0830	121,877
Payables (trade, not insurance)	R0840	2,420
<b>Subordinated liabilities</b>	<b>R0850</b>	
Subordinated liabilities not in Basic Own Funds	R0860	
Subordinated liabilities in Basic Own Funds	R0870	
Any other liabilities, not elsewhere shown	R0880	295,275
<b>Total liabilities</b>	<b>R0900</b>	<b>2,479,745</b>
<b>Excess of assets over liabilities</b>	<b>R1000</b>	<b>1,308,445</b>

**S.05.01.02**

## Premiums Claims and Expenses by Line of Business

Non-Life (direct business/ accepted proportional and accepted non – proportional reinsurance)

Amounts in \$'000

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)													
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120
<b>Premiums written</b>													
Gross - Direct Business	R0110	366	31,764	32,416	-	-	215,610	231,373	513,192	248,942	-	628	27,920
Gross - Proportional reinsurance accepted	R0120	-	122	-	-	-	10,911	40,351	8,347	-	-	2,331	30
Gross - Non-proportional reinsurance accepted	R0130	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0140	186	16,635	4,393	-	-	95,226	116,526	160,948	48,391	-	31	21,634
<b>Net</b>	<b>R0200</b>	<b>180</b>	<b>15,191</b>	<b>28,033</b>	<b>-</b>	<b>-</b>	<b>120,295</b>	<b>155,699</b>	<b>352,591</b>	<b>200,551</b>	<b>-</b>	<b>2,928</b>	<b>6,315</b>
<b>Premiums earned</b>													
Gross - Direct Business	R0210	285	31,779	29,821	-	-	214,172	237,856	517,877	231,930	-	661	25,495
Gross - Proportional reinsurance accepted	R0220	-	323	-	-	-	10,045	32,028	9,468	-	-	1,973	30
Gross - Non-proportional reinsurance accepted	R0230	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0240	179	15,677	4,445	-	-	99,372	120,900	178,926	40,263	-	31	19,325
<b>Net</b>	<b>R0300</b>	<b>106</b>	<b>16,425</b>	<b>25,377</b>	<b>-</b>	<b>-</b>	<b>124,846</b>	<b>148,984</b>	<b>348,418</b>	<b>191,667</b>	<b>-</b>	<b>2,610</b>	<b>6,199</b>
<b>Claims incurred</b>													
Gross - Direct Business	R0310	252	11,827	15,430	-	-	87,925	115,375	297,863	104,718	-	61	(12,428)
Gross - Proportional reinsurance accepted	R0320	-	1,211	-	-	-	3,224	4,023	10,275	-	-	178	(1)
Gross - Non-proportional reinsurance accepted	R0330	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0340	(7)	5,204	2,175	-	-	50,391	48,727	146,003	27,197	-	20	(3,876)
<b>Net</b>	<b>R0400</b>	<b>259</b>	<b>7,834</b>	<b>13,255</b>	<b>-</b>	<b>-</b>	<b>40,759</b>	<b>70,671</b>	<b>162,135</b>	<b>77,521</b>	<b>-</b>	<b>219</b>	<b>(8,553)</b>
<b>Changes in other technical provisions</b>													
Gross - Direct Business	R0410	-	-	-	-	-	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	R0420	-	-	-	-	-	-	-	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	R0430	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0440	-	-	-	-	-	-	-	-	-	-	-	-
<b>Net</b>	<b>R0500</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Expenses incurred</b>	<b>R0550</b>	<b>44</b>	<b>7,150</b>	<b>12,485</b>	<b>-</b>	<b>-</b>	<b>46,386</b>	<b>76,969</b>	<b>118,205</b>	<b>76,115</b>	<b>-</b>	<b>1,317</b>	<b>1,702</b>
<b>Other expenses</b>	R1200	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total expenses</b>	<b>R1300</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

**S.05.01.02**

Premiums Claims and Expenses by Line of Business

Non-Life (direct business/ accepted proportional and accepted non – proportional reinsurance)

Amounts in \$'000

		Line of Business for: accepted non-proportional reinsurance				Total
		Health	Casualty	Marine, aviation, transport	Property	
		C0130	C0140	C0150	C0160	
<b>Premiums written</b>						
Gross - Direct Business	R0110					1,302,813
Gross - Proportional reinsurance accepted	R0120					62,091
Gross - Non-proportional reinsurance accepted	R0130	12,592	40,368	88,222	277,466	418,648
Reinsurers' share	R0140	1,193	22,047	38,270	102,403	639,034
<b>Net</b>	<b>R0200</b>	<b>11,398</b>	<b>18,321</b>	<b>49,952</b>	<b>175,063</b>	<b>1,144,518</b>
<b>Premiums earned</b>						
Gross - Direct Business	R0210					1,289,876
Gross - Proportional reinsurance accepted	R0220					53,872
Gross - Non-proportional reinsurance accepted	R0230	12,508	42,413	85,571	264,800	405,293
Reinsurers' share	R0240	1,382	17,797	38,096	97,699	634,091
<b>Net</b>	<b>R0300</b>	<b>11,127</b>	<b>24,616</b>	<b>47,475</b>	<b>167,101</b>	<b>1,114,950</b>
<b>Claims incurred</b>						
Gross - Direct Business	R0310					621,022
Gross - Proportional reinsurance accepted	R0320					18,911
Gross - Non-proportional reinsurance accepted	R0330	7,168	33,557	55,046	143,833	239,604
Reinsurers' share	R0340	1,065	9,399	4,616	34,137	325,051
<b>Net</b>	<b>R0400</b>	<b>6,103</b>	<b>24,158</b>	<b>50,430</b>	<b>109,696</b>	<b>554,486</b>
<b>Changes in other technical provisions</b>						
Gross - Direct Business	R0410					-
Gross - Proportional reinsurance accepted	R0420					-
Gross - Non-proportional reinsurance accepted	R0430	-	-	-	-	-
Reinsurers' share	R0440	-	-	-	-	-
<b>Net</b>	<b>R0500</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<b>Expenses incurred</b>	<b>R0550</b>	<b>3,333</b>	<b>169</b>	<b>21,654</b>	<b>59,016</b>	<b>424,544</b>
<b>Other expenses</b>	R1200					
<b>Total expenses</b>	<b>R1300</b>					<b>424,544</b>

**S.05.02.01**

Premiums Claims and Expenses by Country  
Amounts in \$'000

		Total Top 5 and home country	Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations				
		C0070	C0010	C0020	C0030	C0040	C0050	C0060
R0010			United Kingdom (After Brexit)	Spain (ES)	Germany (DE)	France (FR)	Italy (IT)	Netherlands (NL)
		C0140	C0080	C0090	C0100	C0110	C0120	C0130
<b>Premiums written</b>								
Gross - Direct Business	R0110	1,163,363	727,291	185,456	91,374	91,230	39,140	28,873
Gross - Proportional reinsurance accepted	R0120	10,004	8,380	-	903	35	278	408
Gross - Non-proportional reinsurance accepted	R0130	159,406	102,040	4,627	17,591	10,968	13,958	10,221
Reinsurers' share	R0140	550,998	227,171	166,243	78,001	35,304	25,302	18,977
<b>Net</b>	<b>R0200</b>	<b>781,775</b>	<b>610,541</b>	<b>23,840</b>	<b>31,867</b>	<b>66,928</b>	<b>28,073</b>	<b>20,526</b>
<b>Premium earned</b>								
Gross - Direct Business	R0210	1,147,021	717,428	188,333	89,106	90,182	33,618	28,354
Gross - Proportional reinsurance accepted	R0220	8,406	6,461	-	1,225	55	272	393
Gross - Non-proportional reinsurance accepted	R0230	155,159	100,633	4,476	16,938	9,518	13,862	9,672
Reinsurers' share	R0240	547,915	224,575	167,910	78,228	36,639	22,497	18,065
<b>Net</b>	<b>R0300</b>	<b>762,671</b>	<b>600,007</b>	<b>24,899</b>	<b>29,041</b>	<b>63,115</b>	<b>25,255</b>	<b>20,354</b>
<b>Claims incurred</b>								
Gross - Direct Business	R0310	555,724	317,041	105,235	42,906	72,183	12,345	6,013
Gross - Proportional reinsurance accepted	R0320	8,052	6,789	-	1,045	-	167	52
Gross - Non-proportional reinsurance accepted	R0330	133,695	113,789	586	7,945	465	9,432	1,419
Reinsurers' share	R0340	319,598	157,410	78,530	40,035	26,294	12,703	4,566
<b>Net</b>	<b>R0400</b>	<b>377,873</b>	<b>280,209</b>	<b>27,231</b>	<b>11,860</b>	<b>46,354</b>	<b>9,300</b>	<b>2,917</b>
<b>Changes in other technical provisions</b>								
Gross - Direct Business	R0410							
Gross - Proportional reinsurance accepted	R0420							
Gross - Non-proportional reinsurance accepted	R0430							
Reinsurers' share	R0440							
<b>Net</b>	<b>R0500</b>							
Expenses incurred	R0550	258,383	205,957	2,284	7,156	30,407	5,262	7,317
Other expenses	R1200							
<b>Total expenses</b>	<b>R1300</b>	<b>258,383</b>						

**S.23.01.22**

## Own Funds

Amounts in \$'000

**S.23.01.22.01**

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector</b>						
Ordinary share capital (gross of own shares)	R0010	206,735	206,735			
Non-available called but not paid in ordinary share capital at group level	R0020					
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Non-available subordinated mutual member accounts at group level	R0060					
Surplus funds	R0070					
Non-available surplus funds at group level	R0080					
Preference shares	R0090					
Non-available preference shares at group level	R0100					
Share premium account related to preference shares	R0110					
Non-available share premium account related to preference shares at group level	R0120					
Reconciliation reserve	R0130	1,101,710	1,101,710			
Subordinated liabilities	R0140					
Non-available subordinated liabilities at group level	R0150					
An amount equal to the value of net deferred tax assets	R0160					
<i>An amount equal to the value of net deferred tax assets</i>	<i>R0160</i>					
The amount equal to the value of net deferred tax assets not available at the group level	R0170					
Other items approved by supervisory authority as basic own funds not specified above	R0180					
Non available own funds related to other own funds items approved by supervisory authority	R0190					
Minority interests (if not reported as part of a specific own fund item)	R0200					
Non-available minority interests at group level	R0210					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
<b>Deductions</b>						
financial activities	R0230					
whereof deducted according to art 228 of the Directive 2009/138/EC	R0240					
Deductions for participations where there is non-availability of information (Article 229)	R0250					
Deduction for participations included by using D&A when a combination of methods is used	R0260					
Total of non-available own fund items	R0270					
<b>Total deductions</b>	<b>R0280</b>					
<b>Total basic own funds after deductions</b>	<b>R0290</b>	<b>1,308,445</b>	<b>1,308,445</b>			
<b>Ancillary own funds</b>						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
- type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Non available ancillary own funds at group level	R0380					
Other ancillary own funds	R0390					
<b>Total ancillary own funds</b>	<b>R0400</b>					
<b>Own funds of other financial sectors</b>						
companies - Total	R0410					
Institutions for occupational retirement provision	R0420					
Non regulated entities carrying out financial activities	R0430					
Total own funds of other financial sectors	R0440					
<b>Own funds when using the D&amp;A, exclusively or in combination of method 1</b>						
Own funds aggregated when using the D&A and combination of method	R0450					
Own funds aggregated when using the D&A and a combination of method net of IGT	R0460					
<b>Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&amp;A)</b>	<b>R0520</b>	<b>1,308,445</b>	<b>1,308,445</b>			
<b>Total available own funds to meet the minimum consolidated group SCR</b>	<b>R0530</b>	<b>1,308,445</b>	<b>1,308,445</b>			
<b>Total eligible own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&amp;A)</b>	<b>R0560</b>	<b>1,308,445</b>	<b>1,308,445</b>			
<b>Total eligible own funds to meet the minimum consolidated group SCR</b>	<b>R0570</b>	<b>1,308,445</b>	<b>1,308,445</b>			
<b>Consolidated Group SCR</b>	<b>R0590</b>	<b>905,806</b>				
<b>Minimum consolidated Group SCR</b>	<b>R0610</b>	<b>270,468</b>				
<b>Ratio of Eligible own funds to the consolidated Group SCR (excluding other financial sectors and the undertakings included via D&amp;A)</b>	<b>R0630</b>	<b>144%</b>				
<b>Ratio of Eligible own funds to Minimum Consolidated Group SCR</b>	<b>R0650</b>	<b>484%</b>				
<b>Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&amp;A)</b>	<b>R0660</b>	<b>1,308,445</b>	<b>1,308,445</b>			
<b>SCR for entities included with D&amp;A method</b>	<b>R0670</b>					
<b>Group SCR</b>	<b>R0680</b>	<b>905,806</b>				
<b>Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&amp;A</b>	<b>R0690</b>	<b>144%</b>				

**S.23.01.22.02**

## Reconciliation Reserves

		C0060
<b>Reconciliation reserve</b>		
Excess of assets over liabilities	R0700	<b>1,308,445</b>
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	<b>206,735</b>
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Other non available own funds	R0750	
<b>Reconciliation reserve</b>	<b>R0760</b>	<b>1,101,710</b>
<b>Expected profits</b>		
Expected profits included in future premiums (EPIFP) - Life Business	R0770	
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	<b>272,906</b>
<b>Total Expected profits included in future premiums (EPIFP)</b>	<b>R0790</b>	<b>272,906</b>



**S.25.01.22**

Solvency Capital Requirement – for undertakings on Standard Formula  
Amounts in \$'000

**S.25.01.22.01**

Basic Solvency Capital Requirement

		Gross solvency capital requirement
		C0040
Market risk	R0010	184,544
Counterparty default risk	R0020	71,750
Life underwriting risk	R0030	-
Health underwriting risk	R0040	34,758
Non-life underwriting risk	R0050	874,520
Diversification	R0060	(185,923)
Intangible asset risk	R0070	-
<b>Basic Solvency Capital Requirement</b>	<b>R0100</b>	<b>979,649</b>

**S.25.01.22.02**

Calculation of Solvency Capital Requirement

**Calculation of Solvency Capital Requirement**

		C0100
Adjustment due to RFF/IMAP nSCR aggregation	R0120	
Total capital requirement for operational risk	R0130	56,138,324
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
<b>Solvency capital requirement excluding capital add-on</b>	<b>R0200</b>	<b>905,806</b>
Capital add-on already set	R0210	
<b>Solvency capital requirement</b>	<b>R0220</b>	<b>905,806</b>
<b>Solvency capital requirement</b>		
<b>Other information on SCR</b>		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	
Method used to calculate the adjustment due to RFF/IMAP nSCR aggregation	R0450	4 - No adjustment
Net future discretionary benefits	R0460	
Minimum consolidated group solvency capital requirement	R0470	
<b>Information on other entities</b>		
Capital requirement for other financial sectors (Non-insurance capital requirements)	R0500	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies	R0510	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Institutions for occupational retirement provisions	R0520	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Capital requirements for non-controlled participation requirements	R0530	
Capital requirement for non-controlled participation requirements	R0540	
Capital requirement for residual undertakings	R0550	
<b>Overall SCR</b>		
SCR for undertakings included via D and A	R0560	
<b>Solvency capital requirement</b>	<b>R0570</b>	<b>905,806</b>



**S.32.01.22**

## Undertakings in scope of the group

Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal Name of the undertaking	Type of undertaking	Legal form
C0010	C0020	C0030	C0040	C0050	C0060
GB	213800DGPY42CTVJVQ23	1- LEI	HCC International Insurance Co PLC	2 - Non life insurance undertaking	companies limited by shares or by guarantee or unlimited
GB	213800XX1W9F44RNUZ85	1- LEI	TMHCC Insurance Holdings (International) Limited	5 - Insurance holding company as defined in Article 212(1) (f) of Directive 2009/138/EC	companies limited by shares or by guarantee or unlimited
LU	213800DFWVHWUJYH98	1- LEI	Tokio Marine Europe S.A.	2 - Non life insurance undertaking	companies limited by shares or by guarantee or unlimited
GB	213800DGPY42CTVJVQ23GB30216	2 - Specific code	Qdos Broker and Underwriting Services Limited	99 - Other	companies limited by shares or by guarantee or unlimited
GB	213800DGPY42CTVJVQ23GB10208	2 - Specific code	QDOS Holdings Limited	99 - Other	companies limited by shares or by guarantee or unlimited
GB	213800DGPY42CTVJVQ23GB30202	2 - Specific code	HCC Credit Services Limited	10 - Ancillary services undertaking as defined in Article 1(53) of Delegated Regulation (EU) 2015/35	companies limited by shares or by guarantee or unlimited
GB	213800DGPY42CTVJVQ23JQ30301	2 - Specific code	Rattner Mackenzie Limited	10 - Ancillary services undertaking as defined in Article 1(53) of Delegated Regulation (EU) 2015/35	companies limited by shares or by guarantee or unlimited
GB	213800DGPY42CTVJVQ23GB10101	2 - Specific code	HCC Diversificacion y Soluciones S.L.	10 - Ancillary services undertaking as defined in Article 1(53) of Delegated Regulation (EU) 2015/35	companies limited by shares or by guarantee or unlimited
GB	213800DGPY42CTVJVQ23GB30217	2 - Specific code	GCube Underwriting Limited	99 - Other	companies limited by shares or by guarantee or unlimited
GB	213800DGPY42CTVJVQ23GB30218	2 - Specific code	Renewable Energy Loss Adjusters Limited	99 - Other	companies limited by shares or by guarantee or unlimited

Category (mutual/non mutual)	Supervisory Authority	% capital share	% used for the establishment of consolidated accounts	% voting rights	Level of influence	Yes/No	Method used and under method 1, treatment of the undertaking
C0070	C0080	C0180	C0190	C0200	C0220	C0240	C0260
2 - Non-mutual	The Prudential Regulation Authority	100.00%	100.00%	100.00%	1- Dominant	1- Included in the scope	1- Method 1: Full consolidation
2 - Non-mutual	The Prudential Regulation Authority	100.00%	100.00%	100.00%	1- Dominant	1- Included in the scope	1- Method 1: Full consolidation
2 - Non-mutual	Commissariat aux Assurances	100.00%	100.00%	100.00%	1- Dominant	1- Included in the scope	1- Method 1: Full consolidation
2 - Non-mutual		100.00%	100.00%	100.00%	1- Dominant	1- Included in the scope	3 - Method 1: Adjusted equity method
2 - Non-mutual		100.00%	100.00%	100.00%	1- Dominant	1- Included in the scope	3 - Method 1: Adjusted equity method
2 - Non-mutual		100.00%	100.00%	100.00%	1- Dominant	1- Included in the scope	1- Method 1: Full consolidation
2 - Non-mutual		100.00%	100.00%	100.00%	1- Dominant	1- Included in the scope	1- Method 1: Full consolidation
2 - Non-mutual		100.00%	100.00%	100.00%	1- Dominant	1- Included in the scope	1- Method 1: Full consolidation
2 - Non-mutual		100.00%	100.00%	100.00%	1- Dominant	1- Included in the scope	3 - Method 1: Adjusted equity method
2 - Non-mutual		100.00%	100.00%	100.00%	1- Dominant	1- Included in the scope	3 - Method 1: Adjusted equity method