

SOLVENCY  
AND FINANCIAL  
CONDITION REPORT (SFCR)  
**2019**

**Fortegra Europe  
Insurance Company  
Limited**

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## INTRODUCTION

This report is the Solvency and Financial Condition Report (SFCR) of Fortegra Europe Insurance Company Limited, for the reporting period ended December 31, 2019, pursuant to Articles 51, 53, 54, 256 and 256a of the Solvency II Directive 2009/138/EC, as amended and Articles 290 to 298 and 359 to 364 of Delegated Regulation (EU) 2015/35, as amended. The report has been prepared in accordance with the Solvency II Regulations governing insurance company reporting, and is solely intended to fulfil the requirements thereof.

Pursuant to Article 51 of the Directive, certain information provided in this report is incorporated by reference to the Annual Report. There are, however, certain specific SFCR requirements which are not already reported publicly elsewhere, and those are specifically included in this report. In particular, this report includes reporting of the Solvency II valuation undertaken at December 31, 2019. Those results are also presented in the Quantitative Reporting Templates (QRTs).

## Presentation of information

In this report, unless provided otherwise, the “Company”, refers to Fortegra Europe Insurance Company Limited, organised under the laws of Malta. The Company’s registration number is C84703.

The Company’s financial statements and related notes are prepared in accordance with International Financial Reporting Standards (IFRS) and published in United States Dollar (“USD” or “\$”). Unless otherwise stated, all amounts in this report are expressed in USD. Amounts may have been rounded. Rounding differences may exist, including for percentages.

## Cautionary statement regarding forward looking statements

This report may include statements with respect to future events, trends, plans, expectations or objectives and other forward-looking statements relating to the Company’s future business, financial condition, results of operations, performance, and strategy. Forward-looking statements are not statements of historical fact and may contain the terms “may”, “will”, “should”, “continue”, “aims”, “estimates”, “projects”, or words of similar meaning. Such statements are based on Management’s current views and assumptions and, by nature, involve known and unknown risks and uncertainties’ therefore undue reliance should not be placed on them. Actual financial condition, results of operations, performance or events may differ materially from those expressed or implied in such forward-looking statements, due to a number of factors, including, but not limited to, general economic and political conditions and competitive situation, future financial market performance and conditions, including fluctuations in exchange and interest rates; frequency and severity of insured loss events, and increases in

loss expenses; changes in laws, regulations and standards; the impact of acquisitions and disposals, including related integration issues, and reorganisation measures; and general competitive factors, in each case on a local and/ or global basis. Many of these factors may be more likely to occur, or more pronounced, as result of catastrophic events, or terrorist-related incidents.

## EXECUTIVE SUMMARY

Pursuant to the Solvency II Regulations, the following is a summary overview of each of the sections required in the report. Please refer to each of those sections in their entirety, including in each case the materials incorporated by reference therein.

### A. Business and performance (Section A)

The Company was formed at the beginning of 2018 with primary activities being underwriting of non-life insurance. It accepts risks on the following Solvency II lines of business:

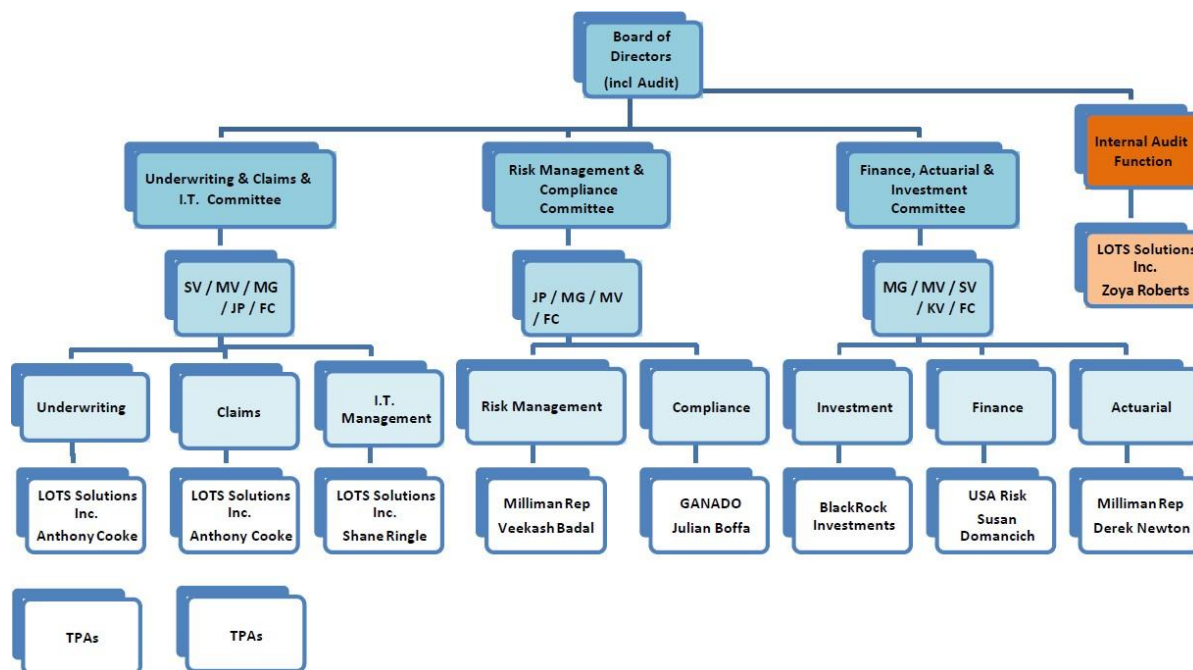
- Other motor insurance;
- Fire and other damage to property insurance;
- Miscellaneous financial loss.

The Company is a wholly-owned subsidiary of Fortegra Europe Holdings Limited, with Fortegra Financial Corporation serving as the parent company.

The Company transacted the first insurance business in November 2018. For the year ended 31 December 2019 written premiums amounted to USD34.3 million (2018: USD1.6 million) and claims incurred totalled USD2.4 million (2018: nil). The company registered a profit before tax of USD337,195 (2018: loss before tax for the period of USD438,911).

### B. System of governance (Section B)

The Company's corporate governance framework is summarised in the following table:



In order to manage the risks to which the Company is exposed, the Company has put in place a comprehensive system of internal controls and risk management governance designed to ensure that executives are informed of significant risks on a timely and continuing basis and have the necessary information and tools to appropriately analyse and manage these risks. Such controls include an internal framework with three risk-related lines of defence; the use of the four key functions (Risk Management; Compliance; Internal Audit; and Actuarial) as required by the Solvency II Regulations; and a system of internal risk management governance designed to ensure that the risks to which the Company is exposed are identified, assessed, monitored and controlled in a timely manner.

## C. Risk profile (Section C)

The Company is exposed to a wide variety of risks, including underwriting risks, market risks, credit risks, liquidity risks, operational risks and other material risks. The nature of such risks and their impact on the Company's risk profile under various scenarios are in each case set forth in Section C hereof, including by reference to the documents incorporated therein.

The Company also considered a number of stress tests and scenarios to assess its resilience and strength of its business model when facing adverse events during the projected period. The results from these analyses indicate that the Company will continue to have eligible own funds to comply with the Solvency Capital Requirements (SCR) even in stressed scenarios.

## D. Valuation for solvency purposes (Section D)

The Company's Solvency II balance sheet is prepared as of December 31, 2019, in compliance with Solvency II Regulations.

Assets and liabilities are valued based on the assumption that the Company will pursue its business as a going concern. Technical provisions are recognised with respect to all insurance obligations towards policyholders and beneficiaries of insurance contracts. The value of technical provisions corresponds to the current amount that the Company would have to pay if it were to transfer its insurance obligations to another insurance undertaking.

Assets and liabilities, other than technical provisions, are recognised in compliance with IFRS and interpretations of the IFRS Interpretations Committee that are endorsed by the European Union before the balance sheet date with a compulsory date of January 1, 2017, provided that those standards and interpretations include valuation methods that are in accordance with the following market consistent valuation approach set out in Article 75 of the Solvency II Directive:

- Assets shall be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction;
- Liabilities shall be valued at the amount for which they could be transferred, or settled, between knowledgeable willing parties in an arm's length transaction.

## E. Capital management (Section E)

The Company has the appropriate structure and processes necessary to manage and oversee its own funds, and has a policy and medium-term capital management plan to maintain solvency levels within the limits established by the legislation and by the Company's own risk appetite.

The following table shows details of the Company's solvency ratio:

31 December 2019	
Solvency Capital Requirement (SCR)	USD14,350,278
Eligible own funds to meet the SCR	USD30,768,883
<b>Solvency ratio (SCR coverage)</b>	<b>214.4%</b>

The Company's Solvency Capital Requirement amounted to USD14.4 million. The SCR corresponds to the own funds that the Company must hold to limit the probability of bankruptcy to one case per 200, or that the Company is still 99.5% able to meet its commitments to insurance beneficiaries or policyholders during the following year.

To calculate the solvency ratio, the Company does not make use of matching and volatility



adjustments, or transitional measures for technical provisions.

The Solvency II regulation also establishes a Minimum Capital Requirement (MCR), which is the minimum level of security under which financial resources should never fall. The Company's MCR amounted to USD5.8 million. The ratio of eligible own funds to MCR is equal to 530%.

## Events after the reporting date

During and subsequent to the first quarter ended March 31, 2020, the world has been impacted by the spread of the novel coronavirus (COVID-19). In March 2020, the World Health Organization deemed the outbreak of COVID-19 to be a pandemic, creating significant volatility, unpredictability and economic disruption.

The markets the Company serves in the United Kingdom and Europe have been impacted by weakened economic conditions, temporary business closures, reduced consumer spending and job losses to name a few. In response, the Company has taken various measures to ensure the availability its products and services to customers, the functioning of critical support systems and steps to ensure the safety and security of all employees.

The effects of the COVID-19 are not believed to be significant to the Company's operating results for three months ended March 31, 2020. Due to the variability at which the COVID-19 situation is developing on a daily basis, estimating future period results with precision remains extremely difficult and cannot currently be quantified by the Group given the unknowns at this time and beyond.

## **A. BUSINESS AND PERFORMANCE**

## A. BUSINESS AND PERFORMANCE

### A.1 Business

The Company operates as a non-life insurance company authorised by the Malta Financial Services Authority (“MFSA”) with the head office situated in Malta. The Company is a wholly-owned subsidiary of Fortegra Europe Holdings Limited, with Fortegra Financial Corporation (“Fortegra”) serving as the parent company. Fortegra, an insurance holding company, was incorporated in the State of Georgia in 1981 under the name Life of the South Corporation. In 2009, Fortegra changed its name to Fortegra Financial Corporation and subsequently reincorporated in the State of Delaware in November 2010. Its principal executive offices are located at 10151 Deerwood Park Boulevard, Building 100, Suite 330, Jacksonville, Florida, 32256.

The Company is authorised under the Insurance Business Act (Cap. 403) to write insurance under business Classes 3 (Land vehicles), 8 (Fire and natural forces), 9 (Other damages to property) and 16 (Miscellaneous financial loss), transacting business and providing its services in the following territories:

- |                  |                 |                  |
|------------------|-----------------|------------------|
| - Austria        | - Greece        | - Norway         |
| - Belgium        | - Hungary       | - Poland         |
| - Bulgaria       | - Iceland       | - Portugal       |
| - Croatia        | - Ireland       | - Romania        |
| - Cyprus         | - Italy         | - Slovakia       |
| - Czech Republic | - Latvia        | - Slovenia       |
| - Estonia        | - Liechtenstein | - Spain          |
| - Finland        | - Lithuania     | - Sweden         |
| - France         | - Luxembourg    | - United Kingdom |
| - Germany        | - Netherlands   |                  |

The Company does not underwrite any risks situated in Malta. The business written to date is predominantly in the United Kingdom, however, the Company expects to write increased volumes of business in other EU countries during 2021.

The below are details of the Company:

#### REGISTERED ADDRESS

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The Reed Centre,  
Blue Harbour,  
Ta' Xbiex Marina, Ta' Xbiex, XBX 1027

**SUPERVISORY AUTHORITY**

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The Company's principal supervisor is the Malta Financial Services Authority (MFSA).

Malta Financial Services Authority (MFSA),  
Triq I-Imdina,  
Zone 1, Central Business District, Birkirkara  
CBD 1010  
Malta  
Phone: + 356 2144 1155  
Website: [www.mfsa.com.mt](http://www.mfsa.com.mt)

**STATUTORY AUDITORS**

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Deloitte Audit Limited,  
Deloitte Place,  
Triq I -Intornjatur  
Central Business District  
CBD 3050  
Phone: + 356 2343 2000

**SHAREHOLDERS**

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The table below reflects the company, which holds qualified investments in the Company:

Name	Legal Status	Location	% of ownership
Fortegra Europe Holdings Limited	Limited Liability	Malta	100%

The registered address of the shareholder is:

Fortegra Europe Holdings Limited (C84702)  
The Reed Centre,  
Blue Harbour,  
Ta' Xbiex Marina, Ta' Xbiex, XBX 1027

## A.2 Underwriting performance

The company saw significant growth in 2019 with increased volumes of Guaranteed Asset Protection, as well as the introduction of Other Motor Insurance products (Tyre & Wheel insurance, SMART insurance (dents & scratches), Auto Extended Warranty) and Household Insurance products (Mobile Phone & Gadget cover, Furniture Insurance).

The following is a list of the main product and policy types that the Company wrote during the year:

### **Miscellaneous Financial Loss:**

**Guaranteed Asset Protection (GAP):** Motor vehicle asset protection products providing customers with a financial benefit over and above the amount a motor insurer will pay out in the event the vehicle is declared a total loss, for example, as a result of accidental or malicious damage, fire, theft or flood. The main types of GAP policies purchased are as follows:

**i) Contract Hire/ Lease GAP**

Where a policyholder has leased or hired a motor vehicle for a fixed period, the policy will pay the difference between the contract hire/ lease settlement figure and the motor insurers' settlement.

**ii) Finance GAP**

Where the motor vehicle has been purchased under a finance agreement, the policy will pay the amount by which the finance agreement settlement figure exceeds the motor insurers' settlement.

**iii) Combined Return to Invoice and Finance GAP**

Will pay the greater of a) the amount by which the purchase price of the motor vehicle exceeds the comprehensive motor insurers' settlement or b) the Finance GAP benefit as explained above.

**iv) Combined Vehicle Replacement and Finance GAP**

Will pay the greater of a) the amount by which the cost of a replacement vehicle (equivalent to the original motor vehicle specification) exceeds the comprehensive motor insurers' settlement or b) the Finance GAP benefit as explained above.

### **Other Motor Insurance:**

**Extended Warranty / Mechanical Breakdown Insurance (MBI):** A motor vehicle warranty providing cover for mechanical or electrical failure to specific components up to an agreed limit per claim and in aggregate over the term.

**SMART Repairs (Small to Medium Accident Repair Techniques):** SMART products providing insurance to cover the cost of any parts and labour for minor repair damage, which can be defined as chips, minor dents, light scratches and incidents sustained to the vehicle caused by day to day motoring.

**Key & Misfuel Insurance:** Products providing cover in the event of theft or loss of keys (or remote entry device) to a motor vehicle and where the vehicle has been filled accidentally with the incorrect type of fuel.

**Tyre Insurance:** In the event of accidental or malicious damage, policies providing cover for repair (where possible) or replacement of tyre(s) with tyres of the same or similar specification, subject to the excess payable.

**Alloy Wheel Insurance:** Policies covering the cost of parts and labour to carry out minor repairs to the painted finish of alloy wheels resulting from accidental damage.

**Other Property Insurance:**

**Furniture:** Policies covering structural defects beyond the manufacturer's warranty and accidental damage. Depending upon the type of furniture that is purchased, the length and type of cover that is provided by the manufacture can differ, therefore extended warrant or cover can differ in duration and benefit can be purchased to compliment any warranty that is provided at point-of-sale.

**Mobile & Gadget Cover:** Insurance for mobile phones, tablets, iPads, cameras, laptops, MacBook's, etc.

Below is the quantitative information regarding the activity and underlying results for 2019 by line of business.

<b>Non-life insurance</b>				
	<b>Miscellaneous financial loss 2019 (USD)</b>	<b>Other motor Insurance 2019 (USD)</b>	<b>Other property insurance 2019 (USD)</b>	<b>TOTAL 2019 (USD)</b>
Gross premiums written	8,527,961	21,415,753	4,375,742	34,319,456
Reinsurers' share	-	-	-	-
<b>Net premiums written</b>	<b>8,527,961</b>	<b>21,415,753</b>	<b>4,375,742</b>	<b>34,319,456</b>
Change in the gross provision for unearned premium	(5,900,672)	(17,670,438)	(4,208,937)	(27,780,047)
<b>Earned premiums, net of reinsurance</b>	<b>2,627,289</b>	<b>3,745,315</b>	<b>166,805</b>	<b>6,539,409</b>
<b>Operating expenses</b>				
Acquisition costs	(2,792,375)	(3,809,331)	(1,510,881)	(8,112,587)
Change in deferred acquisition costs, net of reinsurance	1,665,709	2,532,645	1,454,825	5,653,179
<b>Earned premiums, net of reinsurance and acquisition costs</b>	<b>1,500,623</b>	<b>2,468,629</b>	<b>110,749</b>	<b>4,080,001</b>
Claims paid	(277,782)	(2,071,449)	(50,285)	(2,399,516)
Change in the provision for claims	19,246	22,477	(2,867)	38,856
<b>Claims incurred, net of reinsurance</b>	<b>(258,536)</b>	<b>(2,048,972)</b>	<b>(53,152)</b>	<b>(2,360,660)</b>
<b>Net underwriting income</b>	<b>1,242,087</b>	<b>419,657</b>	<b>57,597</b>	<b>1,719,341</b>

As can be seen from the above table, the Company closed the year with gross annual premium for these policies amounting to USD34.3 million.

## A.3 Investment performance

Whilst the main objective of the investment manager is “to provide a total return that exceeds the total benchmark return and to preserve the capital of the respective account”, the current international economic outlook dictates that the Company takes a conservative and cautious approach to investment.

In line with the Company’s Investment Management Policy, the Company only invests in assets whose risks can be properly identified, measured, monitored, controlled and reported. Moreover, such assets shall meet the specific risk profile, approved risk tolerance limits and the business strategy of the Company. It is the Company’s policy that the funds be invested in a range of instruments and credit institutions in order to provide for their safety, liquidity and return.

Through the year the company’s cash resources have grown. As at 31 December 2019, the majority of the Company’s liquid assets are held in cash and cash equivalents and ETFs.

<b>Investment income</b>	<b>2019 (USD)</b>	<b>2018 (USD)</b>
Interest and investment income	540,951	96,885
<b>Total financial income</b>	<b>540,951</b>	<b>96,885</b>



## **A.4 Performance of other activities**

The Company's income is solely generated from the underwriting performance of the policies and the investment performance. Likewise, the expenses are solely generated from the technical and operational costs of the Company. The Company is not engaged in any other activities and does not underwrite third party business.

## **A.5 Any other information**

There is no additional information that has not been included in the preceding sections.

## **B. SYSTEM OF GOVERNANCE**

## B. SYSTEM OF GOVERNANCE

### General information on the system of governance

In the setting up and design of the structure of the organisation, the Board of the Company ensures that there are adequate and suitably qualified human resources to safeguard the proper operation of the Company. In addition to this, the Board ensures at all times that there are well defined communication and reporting procedures in place to ensure that any relevant and critical information is immediately shared amongst the appropriate persons throughout the organisation and that these have access at all times to any information that they need in order to discharge their duties effectively, efficiently and in a timely manner. The flow of information will flow across the organisational hierarchy top down and vice versa, and across any operational or functional units as required.

The Board of the Company, together with the outsourced managed function drive and monitor the system of governance to ensure that the Company's established functions, controls and systems are effective and in line with the Company's policies and regulatory requirements. This is achieved through established policies, processes, key function holders, committee meetings and board meetings.

### Board of Directors

The Board is responsible for setting out the general direction of the Company, the goal being of achieving sound and prudent management. Sound and prudent management entails an effective risk management function and the implementation of adequate internal control practices in a consistent manner throughout the organisational structure. The Board of the Company has established various policies to encompass all the Company's controls and processes. To this effect the Board has the following written policies:

- Business Continuity Policy	- Capital Management Policy
- Complaints and Handling Policy	- Compliance Policy
- Conduct Risk Policy	- Corporate Governance Policy
- Data Privacy Policy	- Fit and Proper Policy
- Internal Audit Policy	- Investment Management Policy
- Own Risk and Solvency (ORSA) Policy	- Outsourcing Policy
- Product Distribution Policy	- Product Oversight and Governance Policy
- Remuneration Policy	- Reserving Policy
- Risk Management Policy	- Underwriting Policy

All policies are reviewed at least annually or when there are material changes to the business structure or changes in any process or processes, in order to ensure that they are up to date and that they reflect the controls intended to be put and kept in place by the Board. All policy reviews are documented and there will be an identified reviewer for each policy. Any recommendation for change is proposed directly to the respective Board Committee and the Board gives the final approval or otherwise for any proposed changes. Any reason for change or otherwise is also documented. The Board ensures that all policies are communicated and understood throughout the organisation, and where necessary or applicable they are made known to any outsourced service providers. In addition to the above, the Board may develop any other policies if required by its business profile or make changes to existing policies where required.

The Board meets at least four times every year or more frequently if required by the business of the Company, or if any circumstance material to the organisation arises at any point in time. The Board is made up of seven members, two being executive directors and five being non-executive directors, two of whom are independent from the Company. The Board is composed as follows:

Chairman:	Mr. Rick Kahlbaugh
Executive Director:	Mr. Sanjay Vara
Non-Executive Directors:	Mr. Mike Grasher
	Mr. Mike Vrbán
	Mr. Kevin Vella (independent)
	Mr. James Portelli (independent)
	Mr. Francis Colalucci

The Board possesses the required diversity of knowledge, skills and experience to perform their role effectively and fulfil the Solvency II criteria to collectively possess the appropriate qualification, experience and knowledge about at least:

- a) Insurance and financial markets;
- b) Business strategy and business model;
- c) System of governance;
- d) Financial and actuarial analysis;
- e) Regulatory framework and requirements.

The Directors have been assessed to be fit and proper for the roles. Personal Questionnaires for each Director have been completed.

## The Board Committees

The Board appointed the following committees to assist it in its governance role. However, the Board still retains the ultimate responsibility for these delegated functions. Each committee has its own terms of reference and the reporting of each of the established committees is directly to

the Board. The Board Committees are as follows:

Underwriting and Claims and IT Committee

Chairman:	Mr. Sanjay Vara
Members:	Mr. Mike Grasher
	Mr. Mike Vrban
	Mr. James Portelli
	Mr. Francis Colalucci

This Committee exists to establish and review, on a regular basis, the insurance needs of the Company's clients and the adequacy of the policies in place, via relationships or otherwise, to ensure the terms and conditions of the Company's Underwriting Agreements with Third Party Administrators (TPAs) or intermediaries in the host jurisdictions are complied with. The Committee is also responsible for ensuring that appropriate due diligence processes are conducted in relation to the quality, size and geographic scope of the claims handling services of the TPAs. Meetings of the Committee are held at least on a quarterly basis.

Finance, Actuarial and Investment Committee

Chairman:	Mr. Mike Grasher
Members:	Mr. Sanjay Vara
	Mr. Mike Vrban
	Mr. Kevin Vella
	Mr. Francis Colalucci

This Committee is responsible for the oversight of the service providers performing the finance, actuarial and investment management functions of the Company and ensuring they meet the expected standards of service in terms of their outsourcing agreements. The Committee is also responsible for the monitoring of the integrity of the financial statements of the Company and the appropriateness of the Company's internal data, systems and controls and compliance with legal and regulatory requirements relating to financial reporting, actuarial and investment management functions. Meetings of the Committee are held at least on a quarterly basis.

Risk Management and Compliance Committee

Chairman:	Mr. James Portelli
Members:	Mr. Mike Grasher
	Mr. Mike Vrban
	Mr. Francis Colalucci

This Committee is responsible for the oversight of the service providers performing the risk management and compliance functions of the Company and ensuring they meet the expected standards of service in terms of their outsourcing agreements. In performing its oversight role, the Committee shall ensure that it receives regular reports from the risk management and compliance functions of the Company at each Committee meeting. Meetings of the Committee are held at least on a quarterly basis.

In terms of Article 2(1) (f) of the Solvency II Directive 2003/71/ EC, the Company classifies as a small and medium-sized enterprise. The functions normally assigned to an audit committee are assumed by the Board. Mr. Mike Grasher, being the person on the Board Committee with the required accounting and auditing expertise is the Chairman of the Committee.

## Key functions

The Board approved various policies to ensure operational independence of the key functions and direct access to the governing body. The Board and/ or relevant delegated committees receive reports from the responsible areas at the Company. The names of the parties responsible for the key functions were communicated to the MFSA.

The key functions have the resources that are necessary to perform the functions assigned to them under their respective policies.

The Company has identified the following key functions:

### SALES AND DISTRIBUTION FUNCTION

The Company promotes its products primarily via insurance intermediaries who will introduce their business to Fortegra. The Company ensures that all appointed insurance intermediaries are duly licensed entities and will enter into a formal Terms of Business Agreement (TOBA) with such intermediaries on a temporary, annual basis. These intermediaries are independent from Fortegra and intermediate on behalf of various insurance undertakings. This function is the responsibility of Mr. Joe Avellino, with Mr. Sanjay Vara being the key function holder.

### UNDERWRITING FUNCTION

Mr. Anthony Cooke is the person responsible for the underwriting function of the Company. The key function holder is Mr. Sanjay Vara.

### MANAGEMENT AND FINANCE FUNCTION

These functions were outsourced to USA Risk Group (Malta) Limited, an insurance manager authorised by the MFSA to carry out the activity of insurance management. It is the responsibility of the insurance manager to ensure that suitable resources are available within its staff complement to perform these key functions. The key function holder of the management function is Mr. Sanjay Vara, while the key functional holder of the finance function is Mr. Mike Grasher.

## COMPLIANCE FUNCTION

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This function was outsourced to Ganado Advocates, with the Compliance Officer being Mr. Julian Boffa. The Company's intention is to continue to passport its services to various territories within Europe and in order to ensure full compliance with the general good provisions of the host jurisdiction, the Company engages the services of suitably qualified companies or individuals to provide such local advice pertinent to each territory, who in turn will support the compliance function in Malta. The Compliance Officer will continue to ensure that when the Company obtains such services, it does so with fit and proper service providers and will oversee the approval of such compliance matters.

In March 2020 the company recruited an in-house compliance officer, Brian Borg. Brian will assume compliance responsibilities previously undertaken by Ganado Advocates.

The key function holder of this function is Mr. James Portelli.

## RISK MANAGEMENT AND ACTUARIAL FUNCTION

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These functions are outsourced to Milliman LLP. The Company has taken this path to ensure that both functions, which are very much aligned in Solvency II disciplines are managed by a company which is well known, professional and experts in this field. These outsourced functions are overseen by the respective committees. The key function holder of the risk management function is Mr. James Portelli, while the key function holder of the actuarial function is Mr. Mike Grasher.

## CLAIMS HANDLING FUNCTION

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The Company utilises the expertise of outsourced TPAs to handle claims management functions. All TPAs are vetted under strict guidelines and formally appointed by the Company. TPAs operate under strict delegated authority in line with the terms of formal Claims Management Agreements. TPAs will manage claim files in line with the Company's instructions and have defined limits for the payment of specific indemnities. Any claims or losses exceeding these agreed limits will be referred to the Insurance Manager for approval prior to authorisation and payment of the claim. The key functional holder is Mr. Sanjay Vara.

## INTERNAL AUDIT FUNCTION

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This function is outsourced intra-group to group internal audit. The Internal Audit Manager conducts on-site audits annually, maintains an independent outlook on matters and adheres to the Internal Audit Policy. Moreover, an Internal Audit Plan was presented to the Board for approval during the year. Periodic review of compliance with relevant rules, regulations and regulatory requirements at an operational level. Internal auditors also perform tests of



information system general controls for systems used in claims processing, as well as tests of inventory integrity and internal controls over financial reporting. The key function holder is Mr. Rick Kahlbaugh.

## INVESTMENT MANAGEMENT FUNCTION

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This function is outsourced to BlackRock Investment Management (UK) Limited. The investment management function will perform investment in securities in accordance with the approved Board's written guidelines and restrictions. The key function holder is Mr. Mike Grasher.

## IT MANAGEMENT FUNCTION

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Mr Shane Ringle of LOTS Intermediate Co is responsible for IT management and he establishes and directs the strategic and tactical goals, policies, and procedures for the information technology department at Fortegra Group. He provides oversight and direction to the software development, network operations and IT security teams. The key function holder is Mr. Sanjay Vara.

The forums and their responsibilities are as set out below:

<b>Management Body</b>	<b>Risk Management Roles and Responsibilities</b>
Board of Directors	<ul style="list-style-type: none"> <li>- Set and agree Company's strategic direction</li> <li>- Maintain the Risk Management Framework, including any major or significant changes</li> <li>- Agree risk strategy</li> <li>- Agree risk appetite</li> <li>- Review and approve risk register</li> <li>- Oversee information systems and data appropriateness</li> <li>- Ensure adequate and appropriate communication between Directors and with all other parties</li> <li>- Ensure that members of the Board, Committees and other parties, including those performing significant outsourced functions, possess the relevant knowledge and experience and fully understand what is required of them</li> <li>- Oversee the calculation of the SCR and continuous compliance therewith</li> <li>- Ensure any conflicts are appropriately managed and do not hinder the proper performance of any individual's duties</li> <li>- Oversee and challenge the ORSA and ensure that this forms an integral part of the decision-making process</li> <li>- Approve the ORSA</li> <li>- Ensure that all sub-committees and other functions perform their required duties adequately and promptly and, where</li> </ul>

	<p>required, report to the Board in a timely and appropriate manner</p> <ul style="list-style-type: none"> <li>- Set and agree an appropriate remuneration policy</li> <li>- Oversee processes and procedures to enable relevant reporting information to be obtained</li> <li>- Oversee QRT reporting disclosures</li> <li>- Oversee and approve the annual Solvency and Financial Condition Report</li> <li>- Oversee and approve the annual Regular Supervisory Report</li> </ul>
Risk Management and Compliance Committee	<ul style="list-style-type: none"> <li>- Propose and oversee Risk Management Framework, including any major or significant changes</li> <li>- Propose and oversee risk strategy</li> <li>- Propose and oversee risk appetite</li> <li>- Determine risk register and keep up-to-date</li> <li>- Oversee fair outcomes for consumers</li> <li>- Ensure that information systems are adequate and appropriate to the Company's requirements, that the data produced is appropriate for the intended use and that the systems enable the identification and management of all risks</li> <li>- Oversee the calculation of the SCR and continuous compliance therewith</li> <li>- Assist in the ORSA process and ensure that this forms an integral part of the decision-making process</li> <li>- Ensure that appropriate processes and procedures are in place to enable relevant reporting information to be obtained</li> <li>- Recommend and approve QRT reporting disclosures</li> <li>- Oversee and recommend the annual Solvency and Financial Condition Report</li> <li>- Oversee and recommend the annual Regular Supervisory Report</li> <li>- Ensure the internal audit requirements are met in an appropriate and proportional manner</li> <li>- Liaise with internal audit</li> <li>- Report to the Board the results of internal audits</li> <li>- Ensure any weaknesses/ issues arising from the internal audit are appropriately dealt with</li> <li>- Liaise with in-house/ outsourced actuarial function providers</li> <li>- Report to the Board on the actuarial function</li> <li>- Ensure all required Pillar III disclosures are met</li> </ul>
Underwriting and Claims and IT Committee	<ul style="list-style-type: none"> <li>- Assist Board in setting insurance risk strategy and appetite</li> <li>- Ensure insurance risk strategy adhered to</li> </ul>

- Propose to the Board insurance risk appetite limits and tolerances
- Monitor insurance risk against limits and ensure this is appropriately reported to the Board
- Provide appropriate input into the calculation of the SCR and technical provisions
- Provide appropriate input into the ORSA process
- Provide any required input into the QRT reporting and the SFCR

Although responsibility for various areas has been delegated, the Board retains overall responsibility for risk management and for ensuring at all times that the Company is managed in a risk-focused manner.

## Relevant resolutions adopted by shareholders and the Board

During 2019, there were no changes to the Company's governance structure.

## Additional information

In the normal course of business operations, a number of transactions took place between the Company and Fortegra Financial Corporation. These transactions related to the payment of costs and administrative expenses.

## Fit and proper requirements

The Company has a Fit and Proper Policy approved by the Board. The Fit and Proper Policy aims to establish the fitness and propriety requirements of the Company with the applicable legislation, regulations and standards of good practice, particularly with Article 42 of the Solvency II Directive and Chapter II - Fit and Proper of the Guidelines on System of Governance issued by EIOPA on 28<sup>th</sup> January 2015 (EIOPA - BOS-14/253).

The aim of this Policy shall be to ensure that all persons who effectively run the Company or have key functions within the Company, fulfil the following requirements at all times:

- That their professional qualifications, knowledge and experience are adequate to enable sound and prudent management;
- That they are of good repute and integrity.

The Policy shall be reviewed by management and presented to the Board, including any proposed amendments thereto, at least on an annual basis. The Board will consider any recommendations arising from the annual review and will be required to approve any proposed revision of the Fit and Proper Policy before it becomes effective.

The Company's Board must have:

Collectively: the appropriate qualifications, experience, and knowledge in at least the following areas:

- a) Insurance and financial markets;
- b) Business strategy and business model;
- c) System of governance;
- d) Financial and actuarial analysis;
- e) Regulatory framework and requirements.

Individually: training and experience appropriate to the professional profile, specifically in the insurance and financial services area, with practical experience obtained from prior positions held during a sufficient period of time.

Relevant personnel and, where applicable, outsourced personnel must have proven personal, professional and business integrity based on trustworthy information about their personal and professional conduct and reputation, including any criminal, financial and supervisory issue which is relevant for this purpose.

To this effect, relevant personnel and outsourced personnel, where applicable must meet the following requirements:

**Personal, professional and business integrity**

- A personal career reflecting the highest respect for company and other laws governing economic activity and business operations, as well as good sales, financial, and insurance practice;
- No criminal records related to crimes against heritage, money laundering, against the social/ economic order and against the tax authorities and social security, and fines related to offences related to infringement against the insurance industry, securities market or consumer protection;
- They must not be prevented from exercising representation in public or management positions in insurance or financial entities;
- They must not be disqualified based on the prevailing regulations.

**Eligibility and compatibility**

- Shall not be subject to incompatibility, disqualification or prohibition pursuant to the laws and internal regulations in force;
- Shall not find themselves in an unavoidable conflict of interest pursuant to the laws and internal regulations in force;
- Shall not hold substantial shareholdings in, or provide professional services to, competitors of the Company, or to be employees, executives or officers thereof, unless they are expressly authorised by the Board;
- Shall not be involved in circumstances which may cause their appointment to or participation in the Company's Board to place the Company's interest at risk.

## Assessment of fitness and properness

The Company ensures that the person is fit for position to be held by following these procedures:

- Evidence shall be provided of qualifications and degrees that are in line with the requirements of the job description, prior to the recruitment of the person in question by the Company;
- The Company shall encourage and sponsor ongoing training and personal development through attendance at seminars and courses related to the area of specialisation of the person in question.

The Company ensures that the person is proper for position to be held by following these procedures:

- A recent good conduct background check is completed and recent employment references shall be obtained prior to the employment of the person in question;
- As part of the recruiting process, at least one of the Directors, representing the

shareholder, shall hold an interview with the person in question in order to ensure that the person is of integrity, honest, competent, and with the correct appetite, attitude and motivation for the position;

- The Compliance Officer shall obtain an annual declaration from every Director of the Company and persons who have submitted their Personal Questionnaire to the MFSA. This shall ensure that they have not been condemned to pay convictions, been subjected to disciplinary, administrative or other action in any court of law in relation to administrative, disciplinary or criminal offence relating to the exercise of duties as Director or Officer of the Company. Furthermore, such declaration shall confirm that they have not been subject of any ongoing investigations, enforcement actions or administrative sanctions by any relevant regulatory or professional body for non-compliance with the provisions governing banking, financial, securities, insurance activity, securities markets, payment instruments or any financial services legislation.

## **Risk management system including the own risk and solvency assessment**

### **Governance structure**

The Board of the Company is ultimately responsible for ensuring the Risk Management System's effectiveness and for determining the Company's Risk profile and tolerance limits. Further to this, the Board is also responsible for approving the Risk Management Strategies and policies within the Risk Management Framework. In performing these functions, the Company's Board is supported by the Risk Management and Compliance Committee.

The Company's risk management function facilitates the application of the Risk Management System. Its functions include the coordination of the strategies, processes and procedures that are necessary to continually identify, measure, monitor, manage and report all the risks to which the Company is exposed to, or may be exposed to.

The risk management function reports to the Board through the Risk Management and Compliance Committee any risk exposures, taking into account their interdependencies, and compliance with established limits, including the ORSA.

### **Risk management objectives, policies, and processes**

The main components of the Company's approach to Risk Management are as follows:

#### **Risk appetite**

The Company sets risk appetites for the various risk categories and appropriate measures and controls are selected and agreed for each of the risk categories. This enables regular reporting to the Board and assists the Board in monitoring the Company's risks. Risk appetite is measured in terms of:

- Those activities and associated risk exposures within a given period of time that the Company is prepared to accept, those it will avoid, those to be transferred via insurance/reinsurance or other contracts and those requiring mitigation through control;
- The ranking of risks within the Company's risk register, i.e. management's view as to whether the risk is adequately controlled or if further work is required to mitigate the risk to improve the resultant risk score;
- Internal Capital Assessment (ICA)

- a) Total capital required to meet strategic and operational objectives; and
- b) As a measure of the total risk based capital which the Company is prepared to set aside, in case of the crystallisation of significant risks. The capital to be held will be determined by the statutory requirements (under Solvency II insurers are required to hold sufficient available capital to avoid the risk of insolvency within the next year with a confidence level of 99.5%) and by the Board's own risk appetite, e.g. using different measures and over a different timeframe.

### **Risk profiling**

The risk register is used to record the risk profiling exercise. The information to be recorded in the risk register includes risk reference number/ ID, risk category, risk type, risk description, risk controls and risk tolerance.

### **Internal Capital Assessment**

A key component of the Risk Management Framework is the Internal Capital Assessment (ICA). This assessment is used to calculate the capital required for each category of the risk that the Company is exposed to. Capital requirements are calculated at the 99.5% confidence level with a 1-year horizon, i.e. to represent a worst-case scenario of a 1 in 200-year event. The capital analysis of the risks contained within the risk register is completed at least annually during the ORSA.

Capital is managed by the Company to ensure the ongoing viability and success of the Company. Pure financial objectives are balanced with the need to set aside appropriate capital in case of adverse events, in accordance with risk appetite and the MFSA requirements.

### **Strategic planning**

The strategic planning process is an annual process when strategy is reviewed and operating plans for future years are formulated. This process considers the Company's risk profile as recorded within the risk register, together with the current risk policies and ICA requirements.

The business objectives are determined, key challenges identified and core assumptions agreed. Scenario analysis is used to help shape strategic options at an early stage, stress tests are applied to challenge key assumptions behind strategic objectives and the overall plan, and operating plan objectives are analysed in detail to identify and assess associated risks.

### **Record keeping**

Risk register details are retained indefinitely by the Company and include details of risk identification and assessment, risk appetite, key controls and remedial actions proposed and implemented. The following records are of particular importance:

- Risk register
- Risk Management Framework Policy, including approval of changes
- Strategic Planning documents



- Compliance exceptional reports
- Internal audit plans and reports
- Board reports and minutes

### **Risk assessment**

The Company aims to:

- Identify the risks and identify what could affect the business and processes going forward;
- Communicate risks that crystallise to the Directors and the Risk Management and Compliance Committee;
- Ensure that controls are identified for each operational risk.

### **Monitoring and controlling risk**

Key monitoring and control activities are undertaken by the Risk Management and Compliance Committee and ultimately the Board.

The Risk Management Policy has the following main objectives:

- To explain the Company's underlying approach to risk management, whilst giving key aspects of the risk management process, and identifying the main reporting procedures;
- To embed a culture of risk awareness within the Company;
- To make all directors, management and staff accountable for managing risk in line with their roles and responsibilities;
- To identify, prioritise, measure, manage, monitor and treat all critical risks in a consistent and effective manner;
- To report using appropriate and reliable risk management tools (including key risk indicators, risk and control self-assessments) to support risk based decision making and capital assessment;
- To comply with all relevant legislation, regulatory requirements, guidance and codes of practice;
- To provide senior management and the Board with timely and dependable assurance that the organisation is managing the significant risks to its business; and
- To enable the Board to review, refresh and approve the Company's Risk Management Strategy annually, as well as to follow any significant change to the business' operating model environment.

Capital is generally estimated in line with the budget for the following year, and is periodically reviewed throughout the year according to risk development, to ensure compliance with the established Risk Appetite limits.

The governing bodies of the Company receive information regarding the quantification of the main risks to which the Company is exposed and the capital resources available to absorb them, as well as information regarding compliance with Risk Appetite limits.

The ORSA is another process through which the Company monitors and identifies any material

risks the company may face. A breakdown of the processes for the identification, measurement, management, monitoring, and notification of risks, by type, is set out below.

Type of Risk	Measurement and management	Monitoring and reporting
<b>Non-life underwriting risk</b> <ul style="list-style-type: none"> <li>- Premium risk</li> <li>- Reserve risk</li> <li>- Lapse risk</li> <li>- Reinsurance mitigation</li> </ul>	Standard formula	Annual
<b>Market risk</b> <ul style="list-style-type: none"> <li>- Interest rate risk</li> </ul>	Standard formula	Annual
<b>Credit risk</b>  Reflects any possible losses arising from unexpected non-compliance by counterparties and debtors over the subsequent twelve months.	Standard formula	Annual
<b>Operational risk</b>  Risk of possible losses deriving from the inadequacy or malfunction of internal processes, personnel or systems, or from external events.	Standard formula	Annual
<b>Liquidity risk</b>  Risk that the Company might not be able to realize its investments and other assets in order to meet its financial commitments at maturity.	Liquidity position  Liquidity indicators	Continuous
<b>Compliance risk</b>  Risk of losses due to legal/ regulatory penalties or reputation losses arising from the failure to comply with laws and regulations, or with applicable administrative requirements.	Monitoring and recognition of significant events	Continuous

<b>Strategic and corporate governance risk</b>  Includes the following risks: <ul style="list-style-type: none"> <li>- Business ethics and good corporate governance</li> <li>- Distribution channels</li> <li>- Organizational structure</li> <li>- Market competition</li> </ul>	Through the corporate policies aligned with the Company's business and organisational principles	Continuous
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All of the calculations deriving from the standard formula are updated when there is a material change in the risk profile. The Board is regularly informed of the risks to which the Company is exposed.

## Own Risk and Solvency Assessment (ORSA)

The Own Risk and Solvency Assessment (ORSA) is an integrated process in the Company's Risk Management System. The ORSA is a mechanism, which identifies, measures, monitors, manages, and reports any short or long-term risks. Further, to ensure a relationship between the business strategy and the overall solvency capital level, the ORSA process is synchronised with the Company's strategic plan. Thus, the ORSA includes all the significant and potential risk that the Company might face and the measures required to mitigate them.

The ORSA is a forward looking process with a three year time horizon which is consistent with business planning, that the ORSA model is based (after demonstrating its appropriateness) on the standard formula approach therefore assuming confidence level of 99.5% and that risks not covered by the Standard Formula are looked at qualitatively or quantitatively if deemed material

The ORSA process considers all potential risks facing the Company, using the risk appetite statement as a starting point. The Board is supported in this by USA Risk Group and Milliman LLP, as set out in the Company's Governance Framework. However, the Board retains ultimate responsibility for the ORSA, including approving the ORSA Policy, directing the process, challenging the assumptions, methodologies and results, and ensuring the output is taken into account in any decisions made. Save for extraordinary events, the ORSA is prepared annually and will take place during the final months of the Company's financial year, thus ensuring that the timing is aligned with the business planning process.

The risk management function also carries out capital management activities that verify the following:

- The eligibility of capital in line with the current legislation;

- The compatibility of distributable dividends for continuous compliance with the Solvency Capital Requirement;
- Continuous compliance with future solvency capital requirements;
- Amounts and quality of the various eligible capital items capable of absorbing losses.

In addition to this, the risk management function is also responsible for the preparation, submission and approval by the Company's Board of the medium-term Capital Management Plan, encompassing the results from forecasts included within the ORSA.

The Company has built validation mechanisms to ensure that the data used is complete, accurate and appropriate. Section E of this report includes more detailed information on capital management.

## Internal control system

Due to its nature, Internal Control involves all people, irrespective of their hierarchical level within the organization, who collectively contribute to providing reasonable assurance on the achievement of the objectives mainly regarding to:

- Operations objectives: effectiveness and efficiency of operations, differentiating the insurance operations (mainly underwriting, claims, reinsurance and investment) as support operations and functions (human resources, administration, commercial, legal, IT, etc.);
- Information objectives: trustworthiness of information (financial and non-financial, both internal and external) regarding its reliability, timeliness or transparency, among others;
- Compliance objectives: compliance with applicable laws and regulations.

For its development within the organisation, the Company adopts a 'three lines of defence' Risk Management Framework for managing the uncertainty and prevention of risk as described below:

- 1) The first line of defence consists of functions that own and manage risk. It is made up of the employees, the management and operations, business and support departments, which are responsible of maintaining an effective control on a day- to-day basis.
- 2) The second line of defence consists of functions that oversee or specialise in risk management and compliance. It is made up of the key functions such as risk management, actuarial function, compliance and others assurance functions, which ensure the internal control functioning.
- 3) The third and final line of defence consists of functions that provide independent assurance, above all internal audit, which provides independent assessment of the adequacy, appropriateness and effectiveness of the Internal Control System and communicates eventual weaknesses timely to whom is responsible for taking the corrective measures, including Top Management and Governing Bodies, as appropriate.

The objective of the governance mechanism is to have continuous appropriate compliance, controls, incentives, communications systems and internal structures that encourage prudent effective internal decision-making and transparent operations. The Company's internal control system consists of tasks and actions that are present in all the activities of the organization and as such is fully integrated into the organisational structure of the Company.

## Compliance function

The role of the compliance function is to advise the Board on the laws, regulations and administrative provisions that effect the Company's compliance with the established regulations. Further to this, the compliance function also conducts an impact assessment of the changes in the legal environment.

The Company's compliance function is based on the specific applicable regulatory requirements, as well as the principle of proportionality based on its business volume and the nature and complexity of the risks assumed by the Company.

Moreover, the compliance function has other responsibilities as set out below:

- Maintain control schedule of required functions/ actions and ensure carried out within specified timeframes;
- Ensure all aspects of the governance framework are kept up-to-date;
- Prepare and update risk events log and report to Board;
- Report to the Board on regulatory, legislative, and other compliance matters;
- Oversee the implementation of improvements/ changes recommended by internal audit.

The Company's Compliance Policy was reviewed and approved by the Board in 2019. The Policy defines the structure and responsibilities of the compliance function.

## Internal audit function

The internal audit function provides an objective, independent and value added overview of the Company's system of governance. It maintains its independence as it reports directly to the Board of the Company and also has free and unrestricted access to meetings and to all information considered necessary for the proper execution of the function.

Moreover, the internal audit function has other responsibilities as set out below:

- Develop and implement a flexible annual audit plan using an appropriate risk based methodology, taking into consideration any risks or control concerns identified by management. The audit plan as well as periodic updates to the plan must be shared with the Board to Coordinate internal audit activities and plans with other assurance providers;
- Review and monitor functioning of internal controls;
- Assess internal control effectiveness;
- Assess appropriateness and effectiveness of overall systems of governance;
- Ensure that the internal audit resources are appropriate and effectively deployed to achieve the annual audit plan;
- Make recommendations to correct deficiencies and for improvements;
- Report to the Board, and at least annually, on the sufficiency and appropriateness of the Company's policies, practices, and controls;
- Make recommendations for remediation action in respect of any significant weaknesses, deficiencies, or matters of noncompliance and ensuring that the remediation actions are carried out.

The mission, function, attributes and obligations of the internal audit function are outlined in the Internal Audit Policy. This has been approved by the Company's Board in November 2018.

The Policy includes the rights and obligations of the Company's internal auditors, as well as their code of ethics. The primary objective is to communicate knowledge and internal audit aspects, classification of audit work, recommendations and deadlines, treatment of audit reports, and any other circumstance related to internal audit activities.

In addition to the aforementioned rights and obligations, the Company's internal auditors avail themselves of the code of ethics as spelled out in the Internal Audit charter. The code of ethics embodies the following four main requirements for internal auditors: Fit and proper, Objectivity, Confidentiality and Proficiency.

## Actuarial function

The actuarial function is outsourced to a third party service provider (Milliman LLP), and governed by the requirements set out in Article 48 of the Solvency II Directive. The actuarial function's oversight is the responsibility of the Finance, Actuarial and Investment Committee.

The Actuarial Function Policy sets out the basic principles and methods and the structure required to perform this function. It outlines in particular the objectives and tasks, the area of responsibility and information, disclosure and audit rights of the actuarial function. The overarching objectives of the actuarial function are defined as follows:

- to coordinate the calculation of technical provisions for the economic solvency balance sheet;
- to ensure the appropriateness of the methods and underlying models used, and of the assumptions made in the calculation of the technical provisions for the economic solvency balance sheet;
- to evaluate the adequacy and quality of the data used for calculating the technical provisions for the economic solvency balance sheet;
- to provide an opinion on general underwriting and acceptance policy; and
- to provide an opinion on the appropriateness of reinsurance agreements.

Beyond this, it is the actuarial function's objective to ensure consistency of the methods used for calculating technical provisions in areas of substantive overlap between the valuation standards of Solvency II and IFRS and to consider the impact of the valuation of technical provisions on other positions of the balance sheet.

The actuarial function performs its tasks independently. To ensure that their independence is not compromised in any way, actuarial function staff may not perform any operational tasks in risk acceptance that they are themselves responsible for monitoring.

The actuarial function reports to the Board at least once a year in the form of a written Actuarial Function Report. This report contains opinions on:

- the reliability and appropriateness of the calculation of the technical provisions;
- the general underwriting and acceptance policy;
- the appropriateness of the reinsurance agreements; and
- the activities undertaken by the actuarial function, including their outcomes.

The Finance, Actuarial and Investment Committee reviews the written Actuarial Function Report and makes recommendations to the Board in respect of any matters arising from the report which it considers require action or improvement. The Actuarial Function on request reports once a year at a meeting of the Finance, Actuarial and Investment Committee on its activities and the results of its work.



## Outsourcing

The Outsourcing Policy establishes the general principles, tasks, processes and responsibilities in the event of outsourcing of a critical and/ or important business function. The scope of this Policy is to establish the standards for implementing outsourcing arrangements for any key, critical, important operational function of the Company in full compliance with legislative and regulatory requirements.

Any outsourced key function or critical function must be notified to the MFSA.

The Board retains ultimate responsibility for the discharging of any obligations related to the outsourced activity or function and must exercise due care in the selection of the service providers, ensuring that they are fit and proper and that any risk generated by the outsourced activity is managed effectively. The Board also remain fully responsible for any sub out-sourcing by the service provider. Furthermore, the Board must ensure that any sub-outsourcing would be notified prior to becoming effective and that it is satisfied that the ultimate service provider also meet the Company's fitness and properness requirements.

The existing governance structure ensures that the Company has sufficient control over the critical functions and/ or activities that have been outsourced, in the terms established in the Solvency II Directive and the enabling local legislation.

## **Any other information**

There is no additional information that has not been included in the preceding sections.

## **C. RISK PROFILE**

## C. RISK PROFILE

### Preliminary information

The Company is committed to implementing a continuous, proactive and systematic approach to risk management that is effected by the Board and management. The Company's risk management processes are designed to identify any potential risks that may affect the operations of the Company and the support it is expected to provide to its respective stakeholders, and to manage these within an agreed upon range of risk tolerances. Risk management is applied strategically and appropriately to provide reasonable assurance that the Company will achieve its objectives.

Risk identification involves documenting the risks within the business and those influencing from the outside. The causes and consequences, together with the mitigation controls are identified for each risk. Each risk identified is assessed, in terms of impact and probability. Level of concern is expressed for each risk and represents a measure of risk appetite. The assessments of inherent risk, residual risk and level of concern are performed by the risk management function holder and reviewed by the Risk Management and Compliance Committee and ultimately the Board.

The Company calculates its Solvency Capital Requirement (SCR) using the standard formula. For the main risk categories, the standard formula is considered an appropriate risk measurement tool for determining the Company's risk exposure, as it recognises the capital charge corresponding to key risks (such as underwriting, market, counterparty and operational risk).

The Company's exposure to other risks not included in the Standard Formula SCR (such as liquidity risk) is not considered significant, as the Company has effective measures in place for the management and mitigation of such risks.

This section provides detail on the breakdown of the capital requirement under Solvency II by risk module and risk sub-module. It also includes a description of the reduction and mitigation techniques used by the Company to minimise its risks. Any possible concentrations are also indicated.

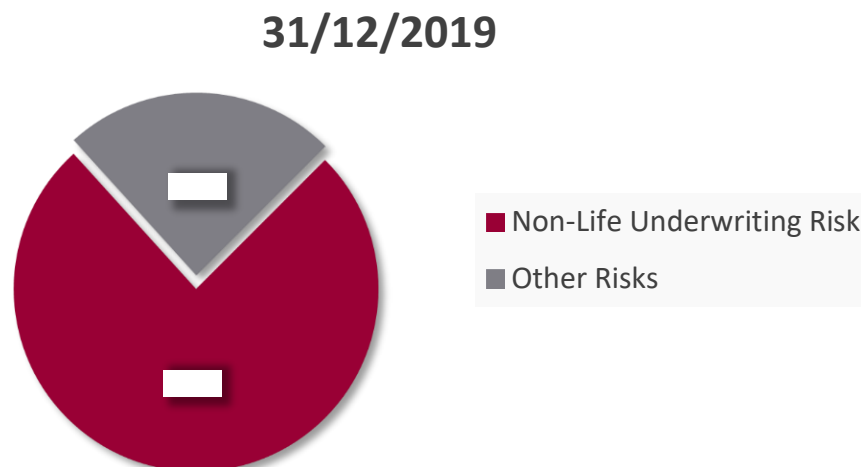
## Underwriting risk

Underwriting risk is the risk of loss or of adverse change in the value of insurance liabilities, due to inadequate pricing and provisioning assumptions. The Company underwrites three lines of business:

- Other motor insurance;
- Fire and other damage to property insurance;
- Miscellaneous financial loss.

Section A.2 'Underwriting performance' details the breakdown of lines written by the company in the year ended 31 December 2019.

As at 31<sup>st</sup> December 2019, underwriting risk represented 76% of all of the risk modules included in the SCR standard formula calculation. The following chart present details by module.



The Company has an Underwriting and Pricing Policy in place which exists to ensure that it has a clear and formal framework of underwriting principles that will provide sustainable pricing for its core functions in full compliance with the Risk Management Policy of the Company. The Policy outlines the processes and controls that are required to adequately analyse, price and manage the business it is willing to accept.

The Company minimises underwriting risk through the implementation of the following measures:

### **Establishing policies, limits and exclusions in underwriting risk**

The insurance products sold by the Company outline the cover provided but are all subject to terms, conditions, limitations and exclusions. These are generally subject to domestic and

international market standards and practices. Notwithstanding, the Company's Underwriting and Pricing Policy establishes the insurance products that can be sold or written by the Company and the lines of business that cannot be entertained. Furthermore, the Underwriting and Pricing Policy provides authority limits which detail the Gross Written Premium by function holder and define the information that is required to be submitted as part of the underwriting process.

### **Setting of a sufficient premium**

The Company gives importance to premium sufficiency, which is supported by actuarial calculations. In relation to pricing, the Company bases its underlying assessment of risk to drive a minimum 15% margin (of net risk), achieving a loss ratio no greater than 85%.

### **Adequate allocation of the technical provisions**

Claims handling and the sufficiency of technical provisions, are basic principles of insurance management. Technical provisions are calculated by the Company's Finance Department with the involvement of the Actuaries.

### **Use of reinsurance**

The Company has entered into a Quota Share Reinsurance Treaty with Lyndon Southern Insurance Company, wherein the Company would cede 30% of its business on a Quote Share basis, upon activation of the Reinsurance.

The Company's objectives overall and for managing underwriting risk are as follows:

- To provide quality insured products that provide value to the end customer;
- To deploy its products and services through B2B relationships with well recognised, reputable brands only;
- To appoint partners, including brokers and TPA's that are financially sound and that are highly regarded within the industry;
- To have a clearly defined understanding of the insurance business it wishes to write;
- To refer to the Underwriting and Claims and IT Committee any business that is considered not to be within its risk appetite or is deemed to be of high risk in nature.

The Company is exposed to underwriting risk arising from natural or man-made catastrophes. To mitigate catastrophe risk, specific reinsurance coverage (as mentioned above) will be purchased to protect the Company's net retained exposure.

## **Claims risk**

The Company utilises the expertise of outsourced TPAs to handle claims management functions. TPAs are vetted under strict guidelines and formally appointed by the Company. TPAs are required to operate under strict delegated authority in line with the terms of formal Claims Management Agreements.

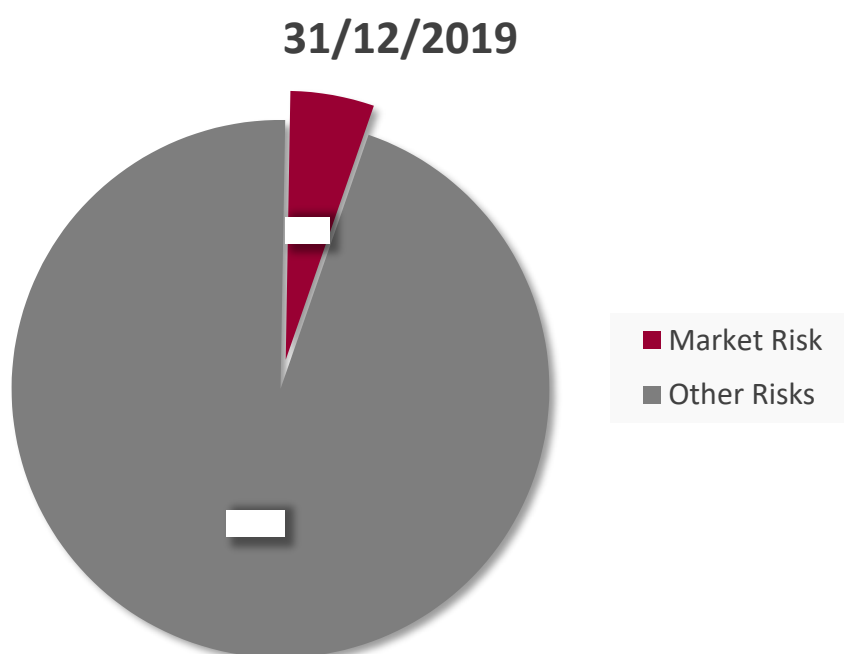
TPAs manage claim files in line with the Company's instructions and have defined limits for the payment of specific indemnities. Any claims or losses exceeding these agreed limits will be referred to the General Manager for approval prior to authorisation and payment of the claim. It must be noted that for the majority of products the claims are low value, routine claims subject to fixed pre-agreed amounts such as replacement costs or repair costs that do not involve complex loss adjustment processes. Any exceptional or large loss would be referred to the General Manager consults with the Underwriting and Claims and IT Committee members or the Board by circular email or in ad hoc meetings and refer the Committee's decision to the TPA in writing.

Within the delegated authority there will be no allowance for any declinature, denial, ex-gratia payments or commercial decision making. Any exceptions to the policy terms or guidelines will require written approval from the Underwriting and Claims and IT Committee members or the Board prior to execution.

## Market risk

Market risk is the risk of loss or of adverse change in the financial situation resulting, directly or indirectly from fluctuations in the level and in the volatility of market prices of assets, liabilities and financial instruments. It is the risk that arises from fluctuations in the values of, or income from, assets. It includes risks associated with movements in interest rates, foreign exchange exposure, equity investments and valuation processes.

As at 31<sup>st</sup> December 2019, market risk represents 5% of all the risk modules included in the SCR standard formula calculation. The following chart present details by module.



The Company aims to maintain a balance between capital preservation, liquidity and investment return. As at 31 December 2019, the majority of the Company's liquid assets are held in cash or short and medium term iShares Exchange Traded Funds.

The Company has put in place arrangements such that liabilities falling due will be met by assets matched by currency for all of the Company's business written across Europe. However, from the point of view of the Solvency II balance sheet, in contrast to the IFRS balance sheet, an element of currency risk may arise from the expected future profit arising from the business and the recognition of this profit in the reporting currency. Due to the small volumes of business written at this time, this is not deemed to be material.

The Company mitigates its exposure to market risk through a prudent investment policy, characterised by eligible investments included within the benchmark. The Company is prohibited



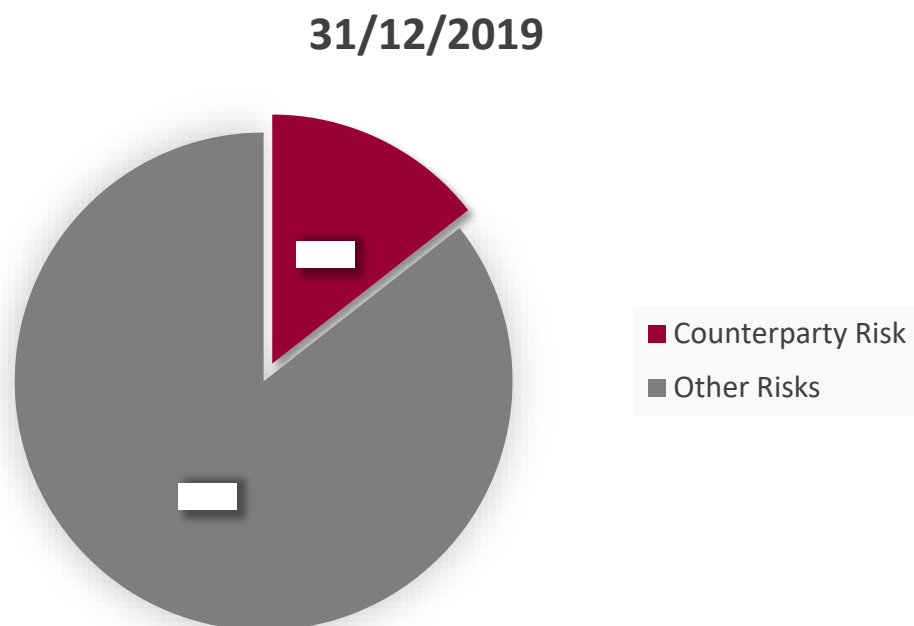
to invest in open-end or closed-end collective investment schemes or any commodity futures or options contracts.

The Risk Management Framework describes the framework and processes used by the Company to identify and assess risks. Risks have been identified and are recorded in the risk register. The risk register is discussed formally on at least an annual basis by the Risk Management and Compliance Committee and Board. To date, at each Board meeting consideration is given to whether the Company's risk profile or risk exposure has changed due to management actions. Once identified, risks will be assessed as to their likely impact and the likelihood of their occurrence. This assessment is done both on an inherent basis (i.e. without taking account of controls and mitigations) and on a residual risk basis (i.e. the risk remaining after any mitigations). Risks will then be allocated a significance based on the combined effect of these ratings.

## Credit risk

Credit risk is the risk of loss or of adverse change in the financial situation, resulting from fluctuations in the credit standing of issuers of securities, counterparties, and any debtors to which insurance undertakings are exposed, in the form of counterparty default risk.

As at 31<sup>st</sup> December 2019, the counterparty default risk represents 14% of all of the risk modules included in the SCR standard formula calculation. The following chart present details by module.



### Counterparty default risk

The company currently holds almost all of its cash resources at one bank, which currently has long term issuer credit ratings from the major rating agencies which are in the A range, and is therefore exposed to counterparty default risk if bank credit is downgraded. This could occur if one or more bank(s) are impacted by material adverse financial market performance and global economic downturn, leading to an increase in the likelihood of bank failure.

There is currently no counterparty default risk on reinsurance arrangement (as no inception reinsurance as at year-end) but should the Company enter reinsurance arrangements then, there would be a counterparty default risk capital charge on the reinsurance arrangement.

The risk management of credit risk should cover the failure of counterparty due diligence of both

insurance counterparties and reinsurers. Risks that have been identified as material are included within the risk register. Risk identification involves a regular, systematic review of the risks on the risk register and documentation of other new and developing risks within the business and those influencing it from outside. This risk identification phase should reflect the most current status of the undertaking's risk profile.

The risk management process will include systems and controls set out as applicable policy and procedures in respect of counter-party assessment including screening, credit risk measurement, problem exposures, provisioning and mitigation and record keeping. Each risk is classified into a risk zone denoted by green, amber or red, with the zones being aligned to the risk appetite of the Company. The risk profile is monitored by the Risk Management and Compliance Committee.

### **Management and mitigation techniques**

Key controls in place are:

- Due diligence reviews of counterparties
- Terms of Business Agreements in place
- Regular monitoring on aged debt
- Audits of counterparties
- Review of credit ratings of counterparties
- Review of all new and renewing reinsurance transactions
- Limiting loss funds held by TPAs

## Liquidity risk

Liquidity risk is the risk that insurance and reinsurance undertakings are unable to realise investments and other assets in order to settle their financial obligations when they fall due.

Liquidity risk is not included in the SCR Standard Formula calculation. Exposure to liquidity risk is considered to be low, taking into account the Company's conservative investment policy, with its investments held in cash and cash equivalent assets and short term duration of investments.

### **Management and mitigation techniques**

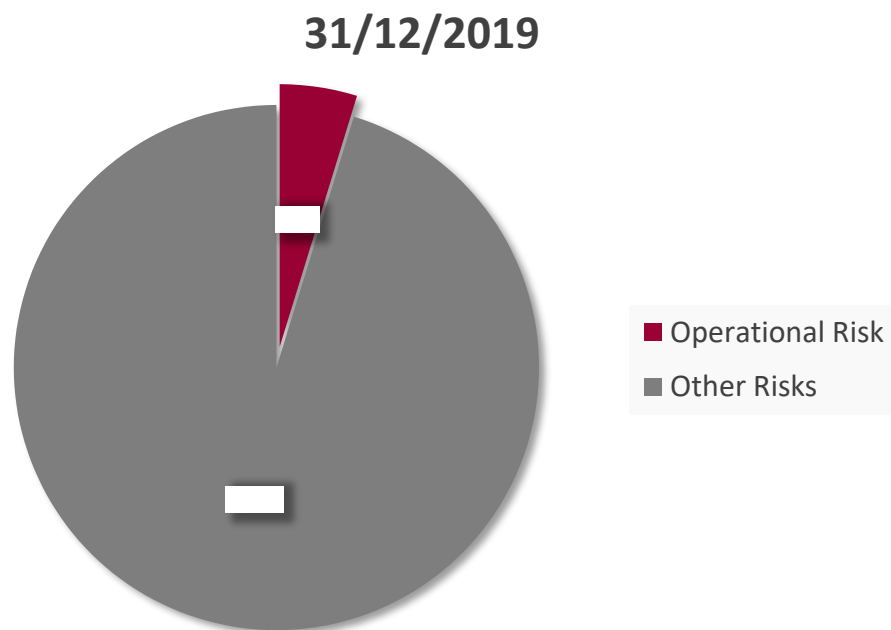
Key controls in place are:

- Cash flow monitoring and reporting
- Claim movements reports
- Claim settlement statements from business partners using in cash flow planning

## Operational risk

The Company defines operational risk as the risk of loss arising from inadequate or failed internal processes, personnel or systems, or from external events. Operational risk is diverse in nature and permeates all business activities, but remains a distinct form of risk in its own right. Operational risk includes the risk associated with information systems, people, external events and strategy, process, finance and accounting, business continuity, outsourcing, regulatory and legal, security and financial crime.

As at 31<sup>st</sup> December 2019, the operational risk represents 5% of all of the risk modules included in the SCR standard formula calculation. The following chart present details by module.



Most of the operational tasks involved in the running of Fortegra are outsourced and therefore, most of the operational risk would result from a dysfunction within the outsourcing counterparty. The company reviews the functions of outsourced service providers to ensure there is a sufficient control environment to mitigate this risk.

The Company seeks to conduct its operations in accordance with market good practice and the highest standards of integrity and fair dealing issues or endorsed by the regulatory requirements, designed to protect policyholders. The operational activities of the Company are supported by appropriate suitable IT systems which are all backed up. Moreover, people risk is managed with the aim of ensuring that sufficient skilled and motivated staff are engaged in cost effective and compliant manner. Personnel who require MFSA approval (approved persons) are subject to ongoing monitoring with regards to fitness and properness requirements.

**Management and mitigation techniques**

Key controls in place are:

- Data back-up and recovery
- Emerging risk process
- Business continuity plan
- Training and development programme
- Conduct risk controls
- Sanction process
- Business change management

## Other material risks

### Non-compliance risk

Non-compliance risk is defined as the risk of incurring losses as a consequence of legal or regulatory penalties, or loss to reputation that may affect the Company as a result of not complying with laws, regulations, rules, internal and external standards or administrative requirements which should be applied to its activities.

The risk is primarily mitigated through the work performed by the compliance function who advises the Company on compliance with laws and regulations and also include an assessment of the possible impact of any changes in the legal environment on the operations of the Company and the identification and assessment of compliance risk.

### Legal risk

Legal risk is defined as the event arising from a change in regulations, law or administrative procedures that may adversely affect the Company.

Over the last years, the regulatory framework to which the insurance industry is subject is being extended with new regulations both at the international and the local level. Additionally, it must be borne in mind that the Company operates in a complex environment under increasing regulatory pressures, not only in the insurance sector but also in the technological, corporate governance or criminal corporate responsibility fields, among others.

This risk is primarily mitigated through the work performed by the compliance function and through the support from the Company's legal counsel.

### Cybersecurity risk

Cyber risks are those risks related to security in the use of information and communication technologies, cyberspace and the transfer, processing and storage of electronic data. These cyber risks can compromise:

- The confidentiality, integrity and availability of information handled by the Company, as well as that of the systems which store, process and/ or transmit it;
- The continuity of the Company's business activity and the services it provides to clients;
- In extreme cases, the physical security both of the facilities and of the people.

The Company relies on the Fortegra Group IT infrastructure and the various IT systems of its key service providers. The Group is responsible for ensuring IT maintains PCI, SOX and regulatory compliance, while establishes policies and procedures that protect the Company against IT risks, including unauthorized access to information, data integrity issues and emerging cybersecurity threats.

## Group risk

The Group has assumed no additional capital requirement for group risk due to the simplicity of the Group structure and the risk mitigations in place. The Group views the operational risk capital requirement of the Company as sufficient to appropriately cover group risk. There is only subsidiary company within the Group, being Fortegra Europe Insurance Company Limited. Given the structure of Fortegra Europe Holdings Limited and the current state of the business, group risk is deemed to be immaterial.

## Strategic risk

The Company aims to operate an appropriate framework for limiting the possibility of strategic risk which could arise from inappropriate business decisions or the implementation of such decisions or a lack of consideration of the wider markets in which the Company operates. The Company sets a high level business strategy which is translated into a three year financial business plan, a volume plan by distribution channel and a detailed one-year budget. Performance both against budget and volume plan are reviewed quarterly.

## Brexit

On 23 June 2017, British citizens voted to exit the European Union and this process is now in motion. However, the outcome of the exit negotiations is still subject to a high degree of uncertainty. While Malta-based companies will continue to be able to conduct business in the European market, it is possible that passporting into the UK market will eventually cease. However, the UK government has announced a Temporary Permissions Regime (TPR) that will enable relevant firms and funds which passport into the UK to continue operating in the UK if the passporting regime falls away abruptly when the UK leaves the EU.

The company is authorised to participate in the TPR. Therefore its right to undertake insurance business in the UK is secured for the next three years. In order to secure its activities in the UK market over a longer time frame, the company is in the process of applying for regulatory approval to establish a branch within the UK. There is no reason to suppose that the establishment of a UK branch would not be granted.



The Company applied to participate in the Temporary Permissions Regime (TPR) for inbound passporting EEA Firms, as well as making an application to open a UK Branch in order to maintain access to the UK market post completion of Brexit. The Board continues to monitor the outcome of future Brexit negotiations to ensure that prompt mitigation action can be taken at the appropriate time.

## C.6 Any other information

### Stress and scenario tests

The purpose of such stress and scenario tests is to determine the areas of greatest risks to the financial wellbeing of the Company. These tests allow the Board to consider the impact on the internal view of required capital and to plan any actions that may be required.

Under the ORSA process, the Board of Fortegra have directed a number of scenario tests to be carried out, a summary of which is provided below.

#### **Scenario 1: Volumes outperform business plan**

As the company only commenced underwriting in Q4 2018, the volumes of business expected to be written in future years are subject to significant uncertainty. The purpose of this scenario is to establish the effect on the overall solvency capital requirement and available capital from a 10% increase in business volumes written over the next 4 years, above those forecast in the business plan. In this scenario, at no point during the next 4 years would the solvency ratio of the company drop to below the target of 120%.

#### **Scenario 2: Pessimistic business plan**

The aim of the second scenario is to establish the effect on the overall solvency capital requirement of a 10% decrease in business volumes written over the next 4 years. In this scenario, it was assumed that business volumes are 10% lower than expected from 1<sup>st</sup> January 2020, with the volumes of business written in the next subsequent years also assumed to be 10% lower than expected. In this scenario, at no point during the next 4 years would the solvency ratio of the company drop to below the target of 120%.

#### **Scenario 3: Downgrade of The Company's primary bank credit rating from A range to BBB**

The company currently holds almost all of its cash resources at one bank, which currently has long term issuer credit ratings from the major rating agencies which are in the A range. The company is therefore exposed to counterparty default risk from this entity and it is prudent to investigate the impact of this entity having its credit rating downgraded. The company has therefore considered a credit rating downgrade to the BBB range.

The increased probability of default increases the projected SCR, as would be expected, but only by a relatively marginal amount. The Solvency Ratio target of 120% would still be comfortably met in all years.

**Scenario 4: Downgrade of The Company's primary bank credit rating (from A to BB)**

Given the materiality of the exposure to counterparty risk, Scenario 3 is extended to consider the credit rating downgrade of the company's primary bank into the BB range (i.e. to become sub-investment grade).

The increased probability of default substantially increases the SCR Counterparty Risk. This has a substantially more material impact on the Counterparty Risk than seen in Scenario 3 due to a much larger increase in the default probability of the counterparty. However, even in this adverse scenario, the overall Solvency Ratio remains substantially above the Solvency ratio target of 120%.

**Scenario 5: The company activates its 30% quota share reinsurance treaty with Lyndon Southern Insurance Company on its GAP business with its main TPA**

The company has in place a 30% all business quota share reinsurance treaty with Lyndon Southern which covers its GAP business sourced through the main TPA who is placing business with the Company. It does not expect to activate this, but could if this was required in order to manage its capital requirements. Lyndon Southern Insurance is a member of Fortegra Financial Corporation based in Delaware, USA. As this contract is not anticipated to be used in the business plan, the Directors have considered the impact of this reinsurance arrangement as a scenario rather than including the effect of the reinsurance arrangement within the central solvency capital requirement calculation.

In performing this calculation, it has been assumed that no ceding commissions will be paid to the company and that no collateralisation arrangements will be put in place. It also uses Lyndon Southern Insurance Company's A.M. Best rating of "A-" for its credit quality.

The treaty leads to a modest overall decrease in the solvency capital requirement of the company over the next 4 years. This is mainly driven by decreases in the SCRs for Insurance Risk which are based on the business volumes net of reinsurance partially offset by a higher capital requirement related to the default of the reinsurer, which is increasing.

**Scenario 6: The company cedes 30% of its business in a quota share reinsurance arrangement with Lyndon Southern 2020**

This is an extension of Scenario 5, but shows the potential impact of an expansion of the 30% QS reinsurance to cover all lines of business. This is to demonstrate the potential impact of having a proportional reinsurance arrangement in place across the entire business.

The reinsurance treaty leads to an overall decrease in the solvency capital requirement of the company over the next 4 years. This is mainly driven by decreases in the SCRs for Insurance Risk which benefits from lower non-ceded business volumes. The second largest impact is a lower Market Risk SCR due to a transfer of market assets to the reinsurer to cover the assumed business. Both of these effects materially outbalance the greater capital requirement related to the default of the reinsurer (i.e. Counterparty Risk SCR), which is increasing.

In this scenario, the company will be vulnerable to deteriorations in solvency position based on the credit rating of the reinsurance counterparty. The counterparty risk is less sensitive to a reinsurance counterparty than a bank holding cash balances (e.g. as in scenarios 3 and 4) due to lower assumed losses given default under the Standard Formula.

#### **Scenario 7: Adverse effects of Brexit**

This scenario is based on the possibility that the UK leaving the European Union in 2020 could adversely affect the economy and lead to reduced volumes of UK business and higher loss ratios. The business in EU countries is assumed to remain as forecast in the business plan.

This is modelled by reducing premium volumes from UK business by 20% (relative to the central forecast) from 2020 onwards. The level of claims remains as per the business plan, which corresponds to an increase in the overall loss ratio by 15% in 2020 reducing to 11% by 2023.

The results illustrate that the Solvency Ratio reduces substantially over the next 4 years, however, even in this scenario, at no point during the next 4 years would the solvency ratio of the company drop to below the target of 120%.

#### **Scenario 8: A larger proportion of liquid assets held in the form of cash**

In the central case modelled using the business plan, it is assumed that cash is maintained at certain levels over the next 4 years. The balance of the financial assets are assumed to be held in the ETFs which the company held at the end of Q4 2019.

In this scenario, the company is assumed to hold a much higher share of its liquid assets in the form of cash at bank.

Overall this results in higher capital requirements and correspondingly lower Solvency Ratios. There is a decline in Market Risk SCR in comparison to the central business plan case – due to the lower exposure to spread, currency and concentration risk on the ETFs. However this is more than offset by a higher Counterparty Risk SCR as a consequence of the greater counterparty exposure to the company's primary bank where the cash is assumed to be held.

Despite the decline, the Solvency Ratios remain substantially above than the 120% target minimum ratio.

## **D. VALUATION FOR SOLVENCY PURPOSES**

## D. VALUATION FOR SOLVENCY PURPOSES

### Assets

The below are the main differences between the measurement of assets under Solvency II (“Solvency value”) and IFRS (“Accounting value”) as at 31 December, 2019.

It must be noted that the balance sheet presented is in-line with the Solvency II regulations, and therefore it was necessary to re-classify data included under certain headings in the financial statements to different headings as presented under “Accounting value” in the table below.

Assets	Solvency II Value 2019 (USD)	Accounting Value 2019 (USD)
Deferred acquisition costs	-	6,856,267
Deferred tax assets	-	373,141
Insurance and intermediaries receivables	6,416,908	6,416,908
Financial assets at Fair Value	25,011,246	25,011,246
Cash and cash equivalents	34,245,855	34,245,855
Any other assets, not elsewhere shown	-	31,024
<b>TOTAL ASSETS</b>	<b>65,674,009</b>	<b>72,934,441</b>

Below are the explanations of the key asset valuation differences in the table above:

#### Deferred acquisition costs

Under IFRS, acquisition costs can be deferred whilst for Solvency II, reserving expenses are not deferred but are taken into account fully in the technical provisions.

#### Deferred tax assets

Deferred taxes are measured under Solvency II as the amounts reported in the audited financial statements as adjusted by the tax impact (at different applicable rates) on the difference between the values assigned to assets and liabilities for solvency purposes and their carrying values as recognised in the financial statements and valued for tax purposes.

Under IFRS, deferred taxes are calculated on all temporary differences using a principal tax rate of 35% with the exception of investment property and freehold and other property for which deferred income taxes may be calculated using a principal tax rate of 8% or 10% of the carrying amount.

The differences between the Solvency II and IFRS value of the deferred tax assets arose due to the company not recognising a deferred tax asset in the SII Balance Sheet until future profits can

be demonstrated.

**Insurance and intermediaries receivables**

Insurance and intermediaries receivables represent the amounts past due for payments by insurers and other insurance-linked business. These payments are not included in the cash inflows of technical provisions.

**Financial assets at Fair Value**

Financial assets include the company's ETF fund investments.

For the purposes of the Solvency II balance sheet, cash and cash equivalents have been valued in accordance with IFRS.

**Cash and cash equivalents**

Cash includes cash in hand, while cash equivalents correspond to highly liquid short-term investments that can be easily converted to fixed amounts of cash and have an insignificant risk of changes in value.

For the purposes of the Solvency II balance sheet, cash and cash equivalents have been valued in accordance with IFRS.

**Any other assets, not elsewhere shown**

The difference between the IFRS value and the Solvency II value of USD31,024 relates to prepayments which are usually not recognised under Solvency II, unless the asset could be recognised and transferred to a third party.

## Technical provisions

The below are the main differences between the valuation of technical provisions under Solvency II and IFRS:

Technical provisions	Solvency II Value 2019 (USD)	Accounting Value 2019 (USD)
Technical provisions non-life	-	30,179,012
Best Estimate (BE)	25,247,000	-
Risk Margin (RM)	1,049,000	-
<b>TOTAL TECHNICAL PROVISIONS</b>	<b>26,296,000</b>	<b>30,179,012</b>

Following are the qualitative explanations of the key technical provision valuation differences using Solvency II criteria and those used during the preparation of the financial statements. In general terms, the main difference between the two valuation methods is the criteria framework under which each regulation falls. While under Solvency II, technical provisions are measured using market economic criteria, for financial statements, technical provisions are calculated based on accounting standards.

The Solvency II Directive 2009/138/EC stipulates that the value of technical provisions shall be equal to the sum of a best estimate and a risk margin. To calculate the solvency ratio, the Company does not make use of matching and volatility adjustments, or transitional measures for technical provisions.

### Best estimate of the provision for claims outstanding

The "best estimate" for the provision for claims outstanding is based on the following principles:

- Taking into account all claims which have been incurred prior to the valuation date, regardless of whether they have been reported or not;
- It is calculated as the present value of expected future cash flows associated with the incurred claim. Projected cash flows will include payments for benefits and related expenses;
- Should there be any liabilities transferred to a counterparty, the recoverable amounts are adjusted to factor in the expected losses due to default of the counterparty;
- The best estimate considers the time value of money based on the consideration of the claim inflows and outflows (using the relevant risk free interest rate term structure provided by EIOPA).

The claim provisions in the financial statements include the provision for outstanding claims reported. The claim provisions calculated based on Solvency II criteria present the following differences with respect to those calculated based on financial statement requirements:

- The elimination of prudence margins. Using accounting standards, a certain prudence



margin is generally applied to provisions to cover possible unfavourable deviations of outstanding claims. However, under Solvency II, the calculation of the claims provision must be made without including any prudence margins;

- The consideration of all cash flow sources;
- The counterparty default risk adjustment to reinsurance recoverable amounts;
- The financial discount of cash flows.

### **Best estimate of the provision for premiums**

The "best estimate" for the premium provision is based on the following principles:

- It relates to future claims, or those which take place subsequent to the valuation date, within the remaining claim coverage period;
- It is calculated as the present value of expected cash flows associated with the current portfolio, in accordance with contract boundaries;
- Projected cash flows will include payments for benefits and related expenses: administration, acquisition, claim management, investment management and premiums receivables not yet due (e.g. premium paid through instalments);
- Should there be any liabilities transferred to a counterparty, the recoverable amounts are adjusted to consider the expected losses due to default of the counterparty.
- The best estimate takes into account the time value of money based on an analysis of claim inflows and outflows (using the relevant risk free interest rate term structure provided by EIOPA).

As indicated previously, the calculation of this provision is comprised of the cash flows corresponding to two portfolios:

- Current portfolio which includes the following:
  - Expected claims. Two different methods may be used to calculate the present value of benefit payments:
    - ✓ The frequency and average cost method: claims are calculated as the result of exposure based on frequency assumptions and final average costs;
    - ✓ Loss ratio method: the expected claims arising from applying the ultimate loss ratio to Unearned Premium Reserve (UPR), gross of acquisition expenses.
  - Expenses attributable to the current portfolio: acquisition (no commissions), administration, chargeable to benefits, investment expenses, as well as other technical expenses.
- Future business which includes the following
  - Premiums for policies, which have not yet been renewed but include company

commitments to renew. This calculation includes the future behaviour of the policyholders based on the application of an estimated lapse ratio;

- Expected loss ratio relating to future premiums. The same methods indicated for the current portfolio may be used;
- Expenses attributable to future premiums (charged expense-to-premium ratio applied to future premiums): acquisition expenses (including commissions), administration, chargeable to benefits, investment expenses, as well as other technical expenses.

Under IFRS, this provision is recognised under the unearned premium reserve, which is calculated on a policy-by-policy basis, reflecting the premium rate on a pro-rata temporary basis for the unearned period of such policies and complemented by the unexpired risk provision calculated segment-by-segment where applicable. The provision supplements the unearned premium reserve with an amount by which the future contractual cash flows arising from such reserve exceed the same reserve.

### **Risk margin**

The risk margin is the cost of providing the capital to cover the SCR over the lifetime of the liabilities. It is intended to ensure that the value of the technical provisions is equivalent to the amount that an insurer would be expected to require in order to take over and meet the insurance obligations.

The calculation of the risk margin complies with the technical specifications set in Articles 37 to 39 of the Delegated Acts.

### **Degree of uncertainty associated with the amount of technical provisions**

The value of technical provisions is directly linked to estimates and projections for future cash flows, which might be subject to a number of factors of uncertainty, which are mainly the following:

- The probability that the obligation will materialise with regard to future cash flows;
- The timing of the claim;
- Potential amount of the future cash flows;
- The risk-free interest rate.

These factors are generally estimated based on expert opinions within the area, or using market data.

## Other liabilities

The below are the main differences between the measurement of other liabilities under Solvency II and IFRS:

Other liabilities	Solvency II Value 2019 (USD)	Accounting Value 2019 (USD)
<b>Total technical provisions</b>	<b>26,296,000</b>	<b>30,179,012</b>
Deferred tax liabilities	-	-
Insurance and intermediaries payables	8,241,280	8,241,280
Payables (trade, not insurance)	367,872	292,124
Any other liabilities, not elsewhere shown	-	75,748
<b>TOTAL LIABILITIES</b>	<b>34,905,152</b>	<b>39,125,164</b>

### Deferred tax liabilities

Deferred tax liabilities arise due to the differences between accounting carrying value and tax carrying value of items on the balance sheet. Deferred tax is measured using tax rates expected to apply when the related deferred tax liability is settled, based on tax rates and laws which have been enacted or substantively enacted.

### Insurance and intermediaries payables

For the purpose of the Solvency II balance sheet, the valuation is considered consistent with that under IFRS, valued at the amount at which they may be transferred or settled between duly-informed interested parties carrying out transactions under mutually-independent conditions.

### Payables (trade, not insurance)

This section includes other payables unrelated to the insurance business. For the purposes of the Solvency II balance sheet, the valuation is considered consistent with that under IFRS, valued at the amount at which they may be transferred or settled between duly-informed interested parties carrying out transactions under mutually-independent conditions, except for USD75,748 relating to accruals which was included under “Payables (trade, not insurance)” under Solvency II balance sheet but under “Any other liabilities, not elsewhere shown under IFRS”.

### Any other liabilities, not elsewhere shown

Refer to the previous section, “Payables (trade, not insurance)”.

## **Alternative methods for valuation**

No alternative valuation methods have been used.

## **Any other information**

There is no other significant information regarding the valuation of assets and liabilities that has not been included in the preceding sections.

## **E. CAPITAL MANAGEMENT**

## **E. CAPITAL MANAGEMENT**

### **E.1 Own funds**

#### **Equity objectives, policies and management processes**

The Capital Management Policy aims to establish standards for the efficient management of capital, to meet the needs of the business in consideration of the overall objectives of the Company. This includes the capital required to support the risk appetite identified in the risk policies of the Company together with a margin for safety, in full compliance with the regulatory requirements.

This Policy, together with the methods of assessment of capital adequacy will be reviewed at least annually by the Board, to ensure its ongoing fitness for purpose. The Board will consider any recommendations arising from the review and will approve any proposed revision before it becomes effective.

Capital management is the collection of processes and activities undertaken to ensure that sufficient capital and reserves (including risk based capital) are maintained, in an economic fashion to ensure the undertaking's ability to meet liabilities particularly in the case of losses arising from adverse events.

Capital management includes the assessment of capital required to support the plans and objectives of the Company, the structure of its equity and retained earnings, arrangements to secure capital, and the ongoing monitoring of capital against business requirements, as well as the assessments required by the MFSA, including future Solvency II requirements.

Should the eligible capital be insufficient at any time during the period covered in the three-year projections, in line with the ORSA, the Company should propose future management measures to remedy such insufficiency and maintain the solvency levels within the levels established in the applicable regulations and the risk appetite.

The medium-term capital management plan prepared by the Company must at least take into account the following:

- a) The capital required to support the existing business and profit targets;
- b) Regulatory capital requirements, based on relevant solvency frameworks for the respective future planning period, particularly the MCR and the SCR over the planning period and the capital requirements as projected by the ORSA;
- c) The planned dividends, if any, and their impact on eligible capital.

During 2019, there were no significant changes to the objectives, policies and processes used to manage the Company's own funds.

## Structure, amount, and quality of own funds

As stipulated in the Solvency II regulations, own funds are classified as either basic or ancillary. They are also classified by Tiers (1, 2, or 3) depending on the characteristics determining their availability to absorb losses.

Tier 1 'own funds' include ordinary share capital, non-cumulative preference shares and relevant sub-ordinated liabilities. All distributions on tier 1 items must be cancelled in the event of a breach of the SCR and repayment of principal must be suspended. Preference shares and sub-ordinated debt will be subject to a new 'loss absorption' requirement which could involve writing off all amounts owed by the insurer. Instruments which do not meet the tier 1 requirements on permanence or loss absorbency may still be categorised as tier 2 or tier 3 items.

As at 31 December, 2019, the unrestricted basic Tier 1 own funds of the Company consist of ordinary share capital and the reconciliation reserve.

Tier 2 'own funds' are likely to include cumulative preference shares, and sub-ordinated liabilities with a shorter duration. As at 31 December, 2019, the Company had no tier 2 'own funds'.

Tier 3 'own funds' are intended (by the Solvency II Directive) to catch own funds which do not satisfy the tier 1 or tier 2 requirements but it appears (from the 5 year minimum duration), and the requirement for supervisory approval before redemption, that there may be other requirements for tier 3 instruments. As at 31st December, 2019, the Company had no tier 3 'own funds'.

All of the own funds of the Company are basic own funds. There are no limitations on their eligibility to cover the SCR and MCR and have the maximum availability for absorbing losses. None of the own fund items required supervisory approval.

The following reflects the structure, amount and quality of own funds, as well as the Company's coverage ratios i.e. the ratio of eligible own funds to SCR and MCR:



## Own funds

Rows	2019					2018				
	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35										
Ordinary share capital (gross of own shares)	R0010	7,490,000.00	7,490,000			7,490,000.00	7,490,000			
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									
Surplus funds	R0070									
Preference shares	R0090									
Share premium account related to preference shares	R0110									
Reconciliation reserve	R0130	-2,221,092	-2,221,092			-448,042	-448,042			
Subordinated liabilities	R0140									
An amount equal to the value of net deferred tax assets	R0160					157,261				157,261
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	25,499,975	25,499,975							
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										
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									
Deductions										
Deductions for participations in financial and credit institutions	R0230									
Total basic own funds after deductions	R0290	30,768,883	30,768,883			7,199,219	7,041,958			157,261
Ancillary own funds										
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 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									
Other ancillary own funds	R0390									
Total ancillary own funds	R0400									
Available and eligible own funds										
Total available own funds to meet the SCR	R0500	30,768,883	30,768,883			7,199,219	7,041,958			157,261
Total available own funds to meet the MCR	R0510	30,768,883	30,768,883			7,041,958	7,041,958			157,261
Total eligible own funds to meet the SCR	R0540	30,768,883	30,768,883			7,041,958	7,041,958			
Total eligible own funds to meet the MCR	R0550	30,768,883	30,768,883			2,366,784				
SCR	R0580	14,350,278				2,862,500				
MCR	R0600	5,801,042				304.18%				
Ratio of Eligible own funds to SCR	R0620	214.41%				246.01%				
Ratio of Eligible own funds to MCR	R0640	530.40%								

## Analysis of changes in Own Funds

The main movements that arose in the year are detailed in the table below:

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
Total basic own funds after deductions 2018	7,199,219	7,041,958			157,261
Additional capital contribution	25,499,975	25,499,975			
Change in Reconciliation reserve (see table below)	(1,773,050)	(1,773,050)			
Change in amount equal to the value of net deferred tax assets	-157,261				(157,261)
Total basic own funds after deductions 2019	30,768,883	30,768,883			

## Reconciliation Reserve

Rows		2019	2018
Reconciliation reserve			
Excess of assets over liabilities	R0700	30,768,883	7,199,219
Own shares (held directly and indirectly)	R0710		
Foreseeable dividends, distributions and charges	R0720		
Other basic own fund items	R0730	32,989,975	7,647,261
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740		
Reconciliation reserve	R0760	-2,221,092	-448,042
Expected profits			
Expected profits included in future premiums (EPIFP) - Life business	R0770		
Expected profits included in future premiums (EPIFP) - Non-life business	R0780		
Total Expected profits included in future premiums (EPIFP)	R0790		

## Difference between the equity in the financial statements and the excess of assets over liabilities for Solvency II purposes

When valuing assets and liabilities for the purposes of Solvency II, different criteria are used from those applied when preparing the financial statements. The above criteria differences lead to differences between the equity stated in the financial statements and excess of assets over liabilities for Solvency II purposes.

As at 31<sup>st</sup> December 2019, the excess of assets over liabilities for Solvency II purposes amounted to USD30.8 million, while equity in the financial statements totalled USD33.8 million.

The main adjustments that arise from the reconciliation of equity in the financial statements and own funds under Solvency II may be observed below:

	Total
	2019
Equity (IFRS value)	33,809,277
<b>Difference in valuation of assets</b>	
Deferred acquisition costs (DAC)	(6,856,267)
Deferred tax asset	(373,141)
Any other assets, not elsewhere shown	(31,024)
<b>Difference in the valuation of liabilities</b>	
Technical provisions	3,883,469
Tax liabilities	336,570
Excess of assets over liabilities	<b>30,768,883</b>

The quantitative and qualitative explanations are provided in Sections D.1 Assets, D.2 Technical Provisions and D.3 Other liabilities, in this report.

## **E.2 Solvency capital requirement (SCR) and minimum capital requirement (MCR)**

### **General principles**

Solvency II provides for two separate levels of solvency capital requirements: (i) the Minimum Capital Requirement (MCR), which applies at Company level and is the amount of own funds below which policyholders and beneficiaries are exposed to an unacceptable level of risk should the insurance companies be allowed to continue its operations, and (ii) the Solvency Capital Requirements (SCR), which applies at both company and group level and corresponds to the level of eligible own funds that enables insurance companies to absorb significant losses and that gives reasonable assurance to policyholders and beneficiaries that payments will be made when due.

### **Solvency Capital Requirement (SCR)**

The SCR corresponds to the own funds that the Company must hold to limit the probability of bankruptcy to one case per 200, or that the Company is still 99.5% able to meet its commitments to insurance beneficiaries or policyholders during the following year.

As stipulated in the Solvency II Directive, all the unrestricted basic Tier 1 own funds are eligible to cover the SCR.

The Company's SCR Ratio is equal to 214.4%. The solvency ratio measures the relationship between the eligible own funds and the solvency capital requirements, and was calculated using the standard formula. The ratio shows the Company's significant capital buffer to absorb extraordinary losses deriving from a 1-in-200 year adverse scenario.

The Solvency Capital Requirement (SCR) at risk module level and calculated using the Standard Formula is set out below:

Gross Solvency Capital Requirement	Amount USD
Market risk	801,213
Counterparty default risk	2,295,794
Life underwriting risk	0
Health underwriting risk	0
Non-life underwriting risk	12,058,953
Diversification	(1,563,078)
Intangible asset risk	
<b>Basic Solvency Capital Requirement</b>	<b>13,592,882</b>

Calculation of Solvency Capital Requirement	Amount USD 2019	Amount USD 2018
Adjustment due to RFF/MAP nSCR aggregation		
Operational risk	757,396	8,575
Loss-absorbing capacity of technical provisions		
Loss-absorbing capacity of deferred taxes		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC		
Solvency Capital Requirement excluding capital add-on	14,350,278	2,366,784
Capital add-on already set		
Solvency capital requirement	14,350,278	2,366,784
Other information on SCR		
Capital requirement for duration-based equity risk sub-module		
Total amount of Notional Solvency Capital Requirements for remaining part		
Total amount of Notional Solvency Capital Requirements for ring fenced funds		
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios		
Diversification effects due to RFF nSCR aggregation for article 304		
Method used to calculate the adjustment due to RFF/MAP nSCR aggregation		
Net future discretionary benefits		

## Minimum Capital Requirement (MCR)

The MCR is the minimum level of security under which financial resources should never fall. When the amount of eligible basic own funds falls below the MCR, the policyholders and beneficiaries are exposed to an unacceptable level of risk, should the Company continue with its business.

All the basic unrestricted Tier 1 own funds are eligible to cover the MCR.

The ratio of eligible own funds to MCR is equal to 530.4%.

Overall MCR Calculation	Amount USD 2019	Amount USD 2018
Linear MCR	5,801,042	247,530
SCR	14,350,278	2,366,784
MCR cap	6,457,625	1,065,053
MCR floor	3,587,569	591,696
Combined MCR	5,801,042	591,696
Absolute floor of the MCR	2,808,500	2,862,500
Minimum Capital Requirement	5,801,042	2,862,500

## Analysis of changes in Capital requirement

The main contributor for the capital requirements is Non-Life Insurance Risk which contributes \$12.1m pre-diversification. This relates principally to the Premium Risk arising from unearned premium and expected future business within ForteGra's business plan.

The SCR for counterparty default risk is \$2.3m pre-diversification and arises from ForteGra's holding of £34.2m in cash mainly at one A rated bank.

The SCR for market risk is \$0.8m pre-diversification and arises from ForteGra's ETF Fund Investments giving rise to spread and concentration risk. Currency risk relates to the balance of Net assets in the non-reporting currencies of EUR and GBP.

Operational risk is calculated as a factor applied to the gross best estimate SII claims and premium provisions (as per standard formula).

## Other information

### **Items deducted from own funds**

The Company did not deduct any items from own funds.

### **Own funds issued and instruments surrendered**

The Company did not issue or surrender any own fund instruments during 2019.

### **Transitional measures**

The Company did not consider any basic own-fund items subject to the transitional arrangements referred to in Article 308b(9) and 308b(10) of the Solvency II Directive 2009/138/EC to be applicable.

### **E.3 Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement**

The Company did not use the duration-based equity risk sub-module set out in Article 304 of the Solvency II Directive 2009/138/EC for the calculation of its Solvency Capital Requirement.



## **E.4 Difference between the standard formula and any internal model used**

The Company does not make use of internal models in its Solvency calculations, but follows the Solvency II Standard formula.

## **E.5 Non-compliance with the Minimum Capital Requirement and Non-compliance with the Solvency Capital Requirement**

As at 31 December, 2019, the Company had a good solvency position and therefore, it was considered unnecessary to adopt any other action or corrective measure.

## **E.6 Any other information**

There is no other information regarding the management of capital that has not been included in the preceding sections.

## **APPENDIX 1 – QUANTITATIVE REPORTING TEMPLATES**

## General Data

* Identifier	213800MUL116VLGKZ71
* Period start date	01/01/2019
* Period end date	31/12/ 2019
* FilingCurrency	USO
• Taxonomy	Sii 2.4.0
• Module	Annual Solvency II reporting Solo

## Advanced Requirements

Identifier scheme	<a href="http://standards.iso.org/iso/17442">http://standards.iso.org/iso/17442</a>
Monetary decimals	
Monetary precision	
Pure decimals	4
Pure precision	4

#XBRL made simple!

## Appendix I: Quantitative reporting templates

### 5.01.01.01.01 - Content of the submission

		Columns
		C0010
Rows		
Template Code - Template name		
S.01.02.01 - Basic Information - General	R0010	Reported
S.01.03.01 - Basic Information - RFF and matching adjustment portfolios	R0020	Not reported as no RFF or MAP
S.02.01.01 - Balance sheet	R0030	Reported
S.02.02.01 - Assets and liabilities by currency	R0040	Reported
S.03.01.01 - Off-balance sheet items - general	R0060	Not reported as no off-balance sheet items
S.03.02.01 - Off-balance sheet items - List of unlimited guarantees received by the undertaking	R0070	Not reported as no unlimited guarantees received
S.03.03.01 - Off-balance sheet items - List of unlimited guarantees provided by the undertaking	R0080	Not reported as no unlimited guarantees provided
S.04.01.01 - Activity by country	R0090	Reported
S.04.02.01 - Information on class 10 in Part A of Annex I of Solvency II Directive, excluding carrier's liability	R0100	Not reported as no activity outside the home country in relation to specific class
S.05.01.01 - Premiums, claims and expenses by line of business	R0110	Reported
S.05.02.01 - Premiums, claims and expenses by country	R0120	Reported
S.06.01.01 - Summary of assets	R0130	Not due as S.06.02 and S.08.01 reported annually
S.06.02.01 - List of assets	R0140	Reported
S.06.03.01 - Collective investment undertakings - look-through approach	R0150	Reported
S.07.01.01 - Structured products	R0160	Not reported as no structured products
S.08.01.01 - Open derivatives	R0170	Not reported o/a no derivative transactions
S.08.02.01 - Derivatives Transactions	R0180	Not reported o/a no derivative transactions
S.09.01.01 - Income/gains and losses in the period	R0190	Reported
S.10.01.01 - Securities lending and repos	R0200	Not reported as no Securities lending and repos
S.11.01.01 - Assets held as collateral	R0210	Not reported as no Assets held as collateral
S.12.01.01 - Life and Health SLT Technical Provisions	R0220	Not reported o/a no life and health SLT business
S.12.02.01 - Life and Health SLT Technical Provisions - by country	R0230	Not reported o/a no life and health SLT business
S.13.01.01 - Projection of future gross cash flows	R0240	Not reported o/a no life and health SLT business
S.14.01.01 - Life obligations analysis	R0250	Not reported o/a no life and health SLT business
S.15.01.01 - Description of the guarantees of variable annuities	R0260	Not reported as no variable annuities
S.15.02.01 - Hedging of guarantees of variable annuities	R0270	Not reported as no variable annuities
S.16.01.01 - Information on annuities stemming from Non-Life Insurance obligations	R0280	Not reported as no annuities stemming from Non-Life Insurance obligations
S.17.01.01 - Non-Life Technical Provisions	R0290	Reported
S.17.02.01 - Non-Life Technical Provisions - By country	R0300	Reported
S.18.01.01 - Projection of future cash flows (Best Estimate - Non Life)	R0310	Reported
S.19.01.01 - Non-life insurance claims	R0320	Reported
S.20.01.01 - Development of the distribution of the claims incurred	R0330	Reported
S.21.01.01 - Loss distribution risk profile	R0340	Reported
S.21.02.01 - Underwriting risks non-life	R0350	Reported
S.21.03.01 - Non-life distribution of underwriting risks - by sum insured	R0360	Reported
S.22.01.01 - Impact of long term guarantees measures and transitionals	R0370	Not reported as no LTG measures or transitionals are applied
S.22.04.01 - Information on the transitional on interest rates calculation	R0380	Not reported as no such transitional measure is applied
S.22.05.01 - Overall calculation of the transitional on technical provisions	R0390	Not reported as no such transitional measure is applied
S.22.06.01 - Best estimate subject to volatility adjustment by country and currency	R0400	Not reported as volatility adjustment not applied
S.23.01.01 - Own funds	R0410	Reported
S.23.02.01 - Detailed information by tiers on own funds	R0420	Reported
S.23.03.01 - Annual movements on own funds	R0430	Reported
S.23.04.01 - List of items on own funds	R0440	Reported
S.24.01.01 - Participations held	R0450	Not reported as no participations held
S.25.01.01 - Solvency Capital Requirement - for undertakings on Standard Formula	R0460	Reported as standard formula is used
S.25.02.01 - Solvency Capital Requirement - for undertakings using the standard formula and partial internal model	R0470	Not reported o/a full use of Standard Formula
S.25.03.01 - Solvency Capital Requirement - for undertakings on Full Internal Models	R0480	Not reported o/a full use of Standard Formula
S.26.01.01 - Solvency Capital Requirement - Market risk	R0500	Reported
S.26.02.01 - Solvency Capital Requirement - Counterparty default risk	R0510	Reported
S.26.03.01 - Solvency Capital Requirement - Life underwriting risk	R0520	Not reported as risk not existent
S.26.04.01 - Solvency Capital Requirement - Health underwriting risk	R0530	Not reported as risk not existent
S.26.05.01 - Solvency Capital Requirement - Non-Life underwriting risk	R0540	Reported
S.26.06.01 - Solvency Capital Requirement - Operational risk	R0550	Reported
S.26.07.01 - Solvency Capital Requirement - Simplifications	R0560	Not reported as no simplified calculations used
S.27.01.01 - Solvency Capital Requirement - Non-life and Health catastrophe risk	R0570	Reported
S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity	R0580	Reported
S.28.02.01 - Minimum Capital Requirement - Both life and non-life insurance activity	R0590	Not reported as only life or only non-life insurance or reinsurance activity or only reinsurance activity
S.29.01.01 - Excess of Assets over Liabilities	R0600	Reported
S.29.02.01 - Excess of Assets over Liabilities - explained by investments and financial liabilities	R0610	Reported
S.29.03.01 - Excess of Assets over Liabilities - explained by technical provisions	R0620	Reported
S.29.04.01 - Detailed analysis per period - Technical flows versus Technical provisions	R0630	Reported
S.30.01.01 - Facultative covers for non-life and life business basic data	R0640	Not reported as no facultative covers
S.30.02.01 - Facultative covers for non-life and life business shares data	R0650	Not reported as no facultative covers
S.30.03.01 - Outgoing Reinsurance Program basic data	R0660	Not reported as no reinsurance
S.30.04.01 - Outgoing Reinsurance Program shares data	R0670	Not reported as no reinsurance
S.31.01.01 - Share of reinsurers (including Finite Reinsurance and SPV's)	R0680	Not reported as no reinsurance
S.31.02.01 - Special Purpose Vehicles	R0690	Not reported as no Special Purpose Insurance Vehicles
S.36.01.01 - IGT - Equity-type transactions, debt and asset transfer	R0740	Not reported as no IGT on Equity-type transactions, debt and asset transfer
S.36.02.01 - IGT - Derivatives	R0750	Not reported as no IGT on Derivatives
S.36.03.01 - IGT - Internal reinsurance	R0760	Not reported as no IGT on Internal reinsurance
S.36.04.01 - IGT - Cost Sharing, contingent liabilities, off BS and other items	R0770	Not reported as no IGT on Cost Sharing, contingent liabilities, off BS and other items

## Basic Information - General

### S.01.02.01.01 - Basic Information - General

		Columns
		C0010
Rows		
Undertaking name	R0010	Fortegra Europe Insurance Company Limited
Undertaking identification code and type of code	R0020	LEI/213800MSUL116VLGKZ71
Type of undertaking	R0040	Non-Life undertakings
Country of authorisation	R0050	MALTA
Language of reporting	R0070	English
Reporting submission date	R0080	21-5-2020
Financial year end	R0081	31-12-2019
Reporting reference date	R0090	31-12-2019
Regular/Ad-hoc submission	R0100	Regular reporting
Currency used for reporting	R0110	USD
Accounting standards	R0120	IFRS
Method of Calculation of the SCR	R0130	Standard formula
Use of undertaking specific parameters	R0140	Don't use undertaking specific parameters
Ring-fenced funds	R0150	Not reporting activity by RFF
Matching adjustment	R0170	No use of matching adjustment
Volatility adjustment	R0180	No use of volatility adjustment
Transitional measure on the risk-free interest rate	R0190	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	R0200	No use of transitional measure on technical provisions
Initial submission or re-submission	R0210	Re-submission
Exemption of reporting ECAI information	R0250	Not exempted
Ad hoc XBRL technical field 1	R0990	
Ad hoc XBRL technical field 2	R0991	
Ad hoc XBRL technical field 3	R0992	

## Balance sheet

### S.02.01.01.01 - Balance sheet

		Columns	
		Solvency II value	Statutory accounts value
		C0010	C0020
Rows			
Assets			
Goodwill	R0010		
Deferred acquisition costs	R0020		6,856,267
Intangible assets	R0030		
Deferred tax assets	R0040		373,141
Pension benefit surplus	R0050		
Property, plant & equipment held for own use	R0060		
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	25,024,872	25,024,872
Property (other than for own use)	R0080		
Holdings in related undertakings, including participations	R0090		
Equities	R0100		
Equities - listed	R0110		
Equities - unlisted	R0120		
Bonds	R0130		
Government Bonds	R0140		
Corporate Bonds	R0150		
Structured notes	R0160		
Collateralised securities	R0170		
Collective Investments Undertakings	R0180	25,024,872	25,024,872
Derivatives	R0190		
Deposits other than cash equivalents	R0200		
Other investments	R0210		
Assets held for index-linked and unit-linked contracts	R0220		
Loans and mortgages	R0230		
Loans on policies	R0240		
Loans and mortgages to individuals	R0250		
Other loans and mortgages	R0260		
Reinsurance recoverables from:	R0270		
Non-life and health similar to non-life	R0280		
Non-life excluding health	R0290		
Health similar to non-life	R0300		
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	6,416,908	6,416,908
Reinsurance receivables	R0370		
Receivables (trade, not insurance)	R0380		
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	34,232,229	34,232,229
Any other assets, not elsewhere shown	R0420		31,024
Total assets	R0500	65,674,008	72,934,441



## Balance sheet

### S.02.01.01.01 - Balance sheet

Liabilities			
Technical provisions – non-life	R0510	26,295,543	30,179,012
Technical provisions – non-life (excluding health)	R0520	26,295,543	30,179,012
Technical provisions calculated as a whole	R0530		
Best Estimate	R0540	25,246,525	
Risk margin	R0550	1,049,018	
Technical provisions - health (similar to non-life)	R0560		
Technical provisions calculated as a whole	R0570		
Best Estimate	R0580		
Risk margin	R0590		
Technical provisions - life (excluding index-linked and unit-linked)	R0600		
Technical provisions - health (similar to life)	R0610		
Technical provisions calculated as a whole	R0620		
Best Estimate	R0630		
Risk margin	R0640		
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650		
Technical provisions calculated as a whole	R0660		
Best Estimate	R0670		
Risk margin	R0680		
Technical provisions – index-linked and unit-linked	R0690		
Technical provisions calculated as a whole	R0700		
Best Estimate	R0710		
Risk margin	R0720		
Other technical provisions	R0730		
Contingent liabilities	R0740		
Provisions other than technical provisions	R0750		
Pension benefit obligations	R0760		
Deposits from reinsurers	R0770		
Deferred tax liabilities	R0780		336,570
Derivatives	R0790		
Debts owed to credit institutions	R0800		
Financial liabilities other than debts owed to credit institutions	R0810		
Insurance & intermediaries payables	R0820	8,241,280	8,241,280
Reinsurance payables	R0830		
Payables (trade, not insurance)	R0840	292,554	292,554
Subordinated liabilities	R0850		
Subordinated liabilities not in Basic Own Funds	R0860		
Subordinated liabilities in Basic Own Funds	R0870		
Any other liabilities, not elsewhere shown	R0880	75,748	75,748
Total liabilities	R0900	34,905,125	39,125,164
Excess of assets over liabilities	R1000	30,768,883	33,809,277

Premiums, claims and expenses by line of business

S.05.01.01.01 - Non-Life (direct business/acceptedproportional reinsurance and accepted non-proportional reinsurance)

Rows	Columns												
	Line of Business for non-life insurance and reinsurance - direct business and accepted proportional reinsurance						Line of Business for accepted non-proportional reinsurance						
	Medical expense	Workers' compensation	Motor vehicle liability	Other motor	Marine aviation and transport	Fire and other damage to	General liability	Credit and suretyship	Legal expenses	Miscellaneous financial loss	Casualty	Marine aviation and transport	Property
	protection												
Gross - Proportional reinsurance accepted				2,141,575.3		4,37,574.2				8,527% 1			343,194.56
Gross - Non-proportional reinsurance accepted													
Reinsurers' share													
				2,141,575.3		4,37,574.2				8,527% 1			343,194.56
Gross - Proportional reinsurance accepted				3,745,315		166,805				2,627.289			6,539,409
Gross - Non-proportional reinsurance accepted													
Reinsurers' share													
Claims incurred				3,745,315		166,805				2,627.289			6,539,409
Gross - Direct Business				2,048.96		53,151				258.536			2,360.660
Gross - Proportional reinsurance accepted													
Gross - Non-proportional reinsurance accepted													
Reinsurers' share													
Charges on other technical provisions				2,048.96		53,151				258.536			2,360.660
Gross - Proportional reinsurance accepted													
Gross - Non-proportional reinsurance accepted													
Expenses incurred				2,487,756		803,506				1,608,926			4,400,187
Administrative expenses													
Gross - Direct Business													
Gross - Proportional reinsurance accepted													
Gross - Non-proportional reinsurance accepted													
Reinsurers' share													
Investment management expenses													
Gross - Direct Business													
Gross - Proportional reinsurance accepted													
Gross - Non-proportional reinsurance accepted													
Reinsurers' share													
Claims management expenses													
Gross - Direct Business													
Gross - Proportional reinsurance accepted													
Gross - Non-proportional reinsurance accepted													
Reinsurers' share													
Annulment on expenses													
Gross - Direct Business				1,276,686						1,126,666			2,459,408
Gross - Proportional reinsurance accepted													
Gross - Non-proportional reinsurance accepted													
Reinsurers' share													
				1,276,686						1,126,666			2,459,408
Gross - Direct Business				1,211,070		247,450				482,260			1,940,780
Gross - Proportional reinsurance accepted													
Gross - Non-proportional reinsurance accepted													
Reinsurers' share													
other expenses				1,211,070		247,450				482,260			1,940,780
Total expenses													4,400,187

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## S.05.01.01.02 - Life

		Columns							
		Line of Business for: Life insurance obligations						Life reinsurance obligations	
		Health insurance	Insurance with profit	Index-linked and unit-linked	Other life insurance	Annuities stemming from	Annuities stemming from	Health reinsurance	Life reinsurance
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280
		C0300							
Rows									
Premiums written									
Gross	R1410								
Reinsurers' share	R1420								
Net	R1500								
Premiums earned									
Gross	R1510								
Reinsurers' share	R1520								
Net	R1600								
Claims incurred									
Gross	R1610								
Reinsurers' share	R1620								
Net	R1700								
Changes in other technical provisions									
Gross	R1710								
Reinsurers' share	R1720								
Net	R1800								
Expenses incurred	R1900								
Administrative expenses									
Gross	R1910								
Reinsurers' share	R1920								
Net	R2000								
Investment management expenses									
Gross	R2010								
Reinsurers' share	R2020								
Net	R2100								
Claims management expenses									
Gross	R2110								
Reinsurers' share	R2120								
Net	R2200								
Acquisition expenses									
Gross	R2210								
Reinsurers' share	R2220								
Net	R2300								
Overhead expenses									
Gross	R2310								
Reinsurers' share	R2320								
Net	R2400								
Other expenses	R2500								
Total expenses	R2600								
Total amount of surrenders	R2700								

## Premiums, claims and expenses by country

### 5.05.02.01.01 - Home Country - non-life obligations

		Columns
		Home country
		C0080
Rows		
Premiums written		
Gross - Direct Business	R0110	
Gross - Proportional reinsurance accepted	R0120	
Gross - Non-proportional reinsurance accepted	R0130	
Reinsurers' share	R0140	
Net	R0200	
Premiums earned		
Gross - Direct Business	R0210	
Gross - Proportional reinsurance accepted	R0220	
Gross - Non-proportional reinsurance accepted	R0230	
Reinsurers' share	R0240	
Net	R0300	
Claims incurred		
Gross - Direct Business	R0310	
Gross - Proportional reinsurance accepted	R0320	
Gross - Non-proportional reinsurance accepted	R0330	
Reinsurers' share	R0340	
Net	R0400	
Changes in other technical provisions		
Gross - Direct Business	R0410	
Gross - Proportional reinsurance accepted	R0420	
Gross - Non-proportional reinsurance accepted	R0430	
Reinsurers' share	R0440	
Net	R0500	
Expenses incurred	R0550	
Other expenses	R1200	
Total expenses	R1300	

### 5.05.02.01.02 - Top 5 countries (by amount of gross premiums written) - non-life obligations

		Columns	Columns	Columns
		Country (by amount of gross premiums written) - non-life obligations	Country (by amount of gross premiums written) - non-life obligations	Country (by amount of gross premiums written) - non-life obligations
		C0090	C0090	C0090
Country		UNITED KINGDOM		
Rows				
Premiums written				
Gross - Direct Business	R0110	34,223,406		
Gross - Proportional reinsurance accepted	R0120			
Gross - Non-proportional reinsurance accepted	R0130			
Reinsurers' share	R0140			
Net	R0200	34,223,406		
Premiums earned				
Gross - Direct Business	R0210	6,513,444		
Gross - Proportional reinsurance accepted	R0220			
Gross - Non-proportional reinsurance accepted	R0230			
Reinsurers' share	R0240			
Net	R0300	6,513,444		
Claims incurred				
Gross - Direct Business	R0310	2,354,419		
Gross - Proportional reinsurance accepted	R0320			
Gross - Non-proportional reinsurance accepted	R0330			
Reinsurers' share	R0340			
Net	R0400	2,354,419		
Changes in other technical provisions				
Gross - Direct Business	R0410			
Gross - Proportional reinsurance accepted	R0420			
Gross - Non-proportional reinsurance accepted	R0430			
Reinsurers' share	R0440			
Net	R0500			
Expenses incurred	R0550	4,356,304		
Other expenses	R1200			
Total expenses	R1300			

### 5.05.02.01.03 - Total Top 5 and home country - non-life obligations

		Columns
		Total Top 5 and home country
		C0140
Rows		
Premiums written		
Gross - Direct Business	R0110	34,319,456
Gross - Proportional reinsurance accepted	R0120	
Gross - Non-proportional reinsurance accepted	R0130	
Reinsurers' share	R0140	
Net	R0200	34,319,456
Premiums earned		
Gross - Direct Business	R0210	6,539,409
Gross - Proportional reinsurance accepted	R0220	
Gross - Non-proportional reinsurance accepted	R0230	
Reinsurers' share	R0240	
Net	R0300	6,539,409
Claims incurred		
Gross - Direct Business	R0310	2,360,660
Gross - Proportional reinsurance accepted	R0320	
Gross - Non-proportional reinsurance accepted	R0330	
Reinsurers' share	R0340	
Net	R0400	2,360,660
Changes in other technical provisions		
Gross - Direct Business	R0410	
Gross - Proportional reinsurance accepted	R0420	
Gross - Non-proportional reinsurance accepted	R0430	
Reinsurers' share	R0440	
Net	R0500	
Expenses incurred	R0550	4,382,505
Other expenses	R1200	
Total expenses	R1300	4,382,505

### 5.05.02.01.04 - Home Country - life obligations

		Columns
		Home country
		C0220
Rows		
Premiums written		
Gross	R1410	
Reinsurers' share	R1420	
Net	R1500	
Premiums earned		
Gross	R1510	
Reinsurers' share	R1520	
Net	R1600	
Claims incurred		
Gross	R1610	
Reinsurers' share	R1620	
Net	R1700	
Changes in other technical provisions		
Gross	R1710	
Reinsurers' share	R1720	
Net	R1800	
Expenses incurred	R1900	
Other expenses	R2500	
Total expenses	R2600	

### 5.05.02.01.05 - Top 5 countries (by amount of gross premiums written) - life obligations

		Columns
		Country (by amount of gross premiums written)
		C0230
Country		R0010
Rows		
Premiums written		
Gross	R1410	
Reinsurers' share	R1420	
Net	R1500	
Premiums earned		
Gross	R1510	
Reinsurers' share	R1520	
Net	R1600	
Claims incurred		
Gross	R1610	
Reinsurers' share	R1620	
Net	R1700	
Changes in other technical provisions		
Gross	R1710	
Reinsurers' share	R1720	
Net	R1800	
Expenses incurred	R1900	
Other expenses	R2500	
Total expenses	R2600	

### 5.05.02.01.06 - Total Top 5 and home country - life obligations

		Columns
		Total Top 5 and home country
		C0280
Rows		
Premiums written		
Gross	R1410	
Reinsurers' share	R1420	
Net	R1500	
Premiums earned		
Gross	R1510	
Reinsurers' share	R1520	
Net	R1600	
Claims incurred		
Gross	R1610	
Reinsurers' share	R1620	
Net	R1700	
Changes in other technical provisions		
Gross	R1710	
Reinsurers' share	R1720	
Net	R1800	
Expenses incurred	R1900	
Other expenses	R2500	
Total expenses	R2600	

## Non-Life Technical Provisions

### 5.17.01.01 - Non-Life Technical Provisions

Rows	Columns															
	Direct business and accepted proportional reinsurance											accepted non-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	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport	Non-proportional property reinsurance
	C0070	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170
Technical provisions calculated as a whole	80010															
Direct business	80020															
Accepted proportional reinsurance business	80030															
Accepted non-proportional reinsurance	80040															
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	80050															
Technical provisions calculated as a sum of BE and RM																
Best estimate																
Premium provisions																
Gross - Total	80060				15,238,442		1,426,206					7,966,437				24,631,086
Gross - direct business	80070				15,238,442		1,426,206					7,966,437				24,631,086
Gross - accepted proportional reinsurance business	80080															
Gross - accepted non-proportional reinsurance business	80090															
Total recoverable from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	80100															
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	80110															
Recoverables from SPV before adjustment for expected losses	80120															
Recoverables from Finite Reinsurance before adjustment for expected losses	80130															
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	80140															
Net Best Estimate of Premium Provisions	80150				15,238,442		1,426,206					7,966,437				24,631,086
Claims provisions																
Gross - Total	80160				388,351		41,301					185,787				615,439
Gross - direct business	80170				388,351		41,301					185,787				615,439
Gross - accepted proportional reinsurance business	80180															
Gross - accepted non-proportional reinsurance business	80190															
Total recoverable from reinsurance/SPV and Finite Re before the adjustment for expected losses due to counterparty default	80200															
Recoverables from reinsurance (except SPV and Finite Reinsurance) before adjustment for expected losses	80210															
Recoverables from SPV before adjustment for expected losses	80220															
Recoverables from Finite Reinsurance before adjustment for expected losses	80230															
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	80240															
Net Best Estimate of Claims Provisions	80250				388,351		41,301					185,787				615,439
Total Best estimate - gross	80260				15,626,793		1,467,507					8,152,225				25,246,525
Total Best estimate - net	80270				15,626,793		1,467,507					8,152,225				25,246,525
Risk margin	80280				649,309		60,976					338,733				1,049,018
Amount of the transitional on Technical Provisions																
TP as a whole	80290															
Best estimate	80300															
Risk margin	80310															
Technical provisions - total	80320				16,276,102		1,528,484					8,490,958				26,295,543
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	80330															
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	80340				16,276,102		1,528,484					8,490,958				26,295,543
Line of Business: further segmentation (Homogeneous Risk Groups)																
Premium provisions - Total number of homogeneous risk groups	80350				6		2					2				
Claims provisions - Total number of homogeneous risk groups	80360				6		2					2				
Cash-flows of the Best estimate of Premium Provisions (Gross)																
Cash out-flows																
Future benefits and claims	80370				12,833,049		1,233,836					7,506,655				21,573,540
Future expenses and other cash-out flows	80380				2,405,393		192,371					459,783				3,057,546
Cash in-flows																
Future premiums	80390															
Other cash-in flows (incl. Recoverable from salvages and subrogations)	80400															
Cash-flows of the Best estimate of Claims Provisions (Gross)																
Cash out-flows																
Future benefits and claims	80410				388,351		41,301					185,787				615,439
Future expenses and other cash-out flows	80420															
Cash in-flows																
Future premiums	80430															
Other cash-in flows (incl. Recoverable from salvages and subrogations)	80440															
Percentage of gross Best Estimate calculated using approximations	80450															
Best estimate subject to transitional of the interest rate	80460															
Technical provisions without transitional on interest rate	80470															
Best estimate subject to volatility adjustment	80480															
Technical provisions without volatility adjustment and without others transitional measures	80490															

#### Non-Life Technical Provisions - By country

S.17.02.01.01 - Gross TP calculated as a whole and Gross BE for different countries - Home country and countries outside the materiality threshold

		Columns		
		Direct business		
		Medical expense insurance	Marine, aviation and transport insurance	General liability insurance
		C0800	C0870	C0890
Rows				
Home country	R0010			
EEA countries outside the materiality threshold - not reported by country	R0020			
Non-EEA countries outside the materiality threshold - not reported by country	R0030			

S.17.02.01.02 - Gross TP calculated as a whole and Gross BE for different countries - Countries in the materiality threshold

		Country	Columns		
			Direct business		
			Other motor insurance	Fire and other damage to property insurance	Miscellaneous financial loss
		C0910	C0960	C0150	
Rows					
Countries in the materiality threshold	R0040	UNITED KINGDOM	15,595,697	1,430,487	8,134,116
Countries in the materiality threshold	R0040				
Countries in the materiality threshold	R0040				
Countries in the materiality threshold	R0040				

## Non-life insurance claims

5.19.01.01.01 - Gross Claims Paid (non-cumulative) - Development year (absolute amount)

Share:		
Z-Akt:		
(line of business)	0000	Worldwide financial loss (direct business and accepted proportional reinsurance)
Accident year / underwriting year	0000	Accident year (AT)
Currency	0000	USD
Currency conversion	0000	Not applicable / Expressed in (converted to) reporting currency

[illegible]

5.19.01.01.02 - Gross Claims Paid (non-cumulative) - Current year, sum of years (cumulative)

Line of business	20000	Non-Financial financial loss (direct business and accepted proportional reinsurance)
Accident year / underwriting year	20000	Accident year (AY)
Currency	20000	USD
Current conversion	20000	Not applicable / Expressed in (converted to) reporting currency

[illegible]

5.19.01.01.03 - Gross undiscounted Best Estimate Claims Provisions - Development year (absolute amount)

Share:		
Z Art:		
Line of business	20001	Miscellaneous financial loss (direct business and accepted proportional reinsurance)
Accident year / underwriting year	20000	Accident year (AY)
Currency	00003	USD
Currency conversion	00040	Not applicable / Expressed in (converted to) reporting currency

[illegible]

5.28.01.01.04 – Gross discounted Best Estimate Claims Provisions - Current year, sum of years (cumulative)

Line of business	Health	Healthcare Financial loss (direct costs and accepted proportional reinsurance)
Accident year / underwriting year	Health	Accident year (AY)
Currency	Health	USD
Currency conversion	Health	Not applicable / Expresses in consumer's reporting currency

[illegible]

5,28,01,01,06 – Gross Reported (but not Settled) Claims (RIBS) - Development year (absolute amount)

Year	
1st year	
2nd year	
3rd year	
4th year	
5th year	
6th year	
7th year	
8th year	
9th year	
10th year	
11th year	
12th year	
13th year	
14th year	
15th year	
16th year	
17th year	
18th year	
19th year	
20th year	
21st year	
22nd year	
23rd year	
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26th year	
27th year	
28th year	
29th year	
30th year	
31st year	
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83rd year	
84th year	
85th year	
86th year	
87th year	
88th year	
89th year	
90th year	
91st year	
92nd year	
93rd year	
94th year	
95th year	
96th year	
97th year	
98th year	
99th year	
100th year	

The screenshot shows a Gantt chart interface with a task named 'Task 1' represented by a solid blue bar. The timeline at the top indicates the period from 1/1/2019 to 31/12/2019, with monthly markers. The task bar starts at the beginning of the timeline and extends to the end, indicating a duration of one full year.

5.19.01.01.06—Gross Reported but not Settled Claims (RBNS) - Current year, sum of years (cumulative)

Details	
Facts	
Line of business	100.00
Accident year / Underwriting year	100.00
Currency	100.00

[illegible]

5.28.21.01.07 - Reinsurance Recoveries received (non-cumulative) - Development year (absolute amount)

Quantity	
1. Area	
Line of business	100.00
Accident year / underwriting year	100.00
Exemption	100.00

Task	Start (Month)	End (Month)	Duration (Months)
Design	0	12	12
Foundation	12	18	6
Structure	18	24	6
Roofing	24	30	6
Interior Finishes	30	36	6



## 5.19.01.01.08 - Reinsurance Recoveries received (non-cumulative) - Current year, sum of years (cumulative)

[illegible]

## \$ 18,01,01,09 - Undiscounted Best Estimate Claims Provisions - Reinsurance recoverable - Development year (absolute amount)

[illegible]

## \$ 18,01,01,10 - Discounted Best Estimate Claims Provisions - Reinsurance recoverable - Current year, sum of years (cumulative)

[illegible]

## S.18.01.01.11 - Reinsurance RBNS Claims - Development year (absolute amount)

[illegible]

## S 18/01/01/12 - Reinsurance PRIS - Current year, sum of years (cumulative)

2 years	
2 years	
Line of business	0010
Portfolio year / underwriting year	0000
Currency	0000
Currency conversion	0000

	Columns
	Year end / underwritten date
	Line

Years	
Year	0000
Yr 10	0010
Yr 11	0011
Yr 12	0012
Yr 13	0013
Yr 14	0014
Yr 15	0015
Yr 16	0016
Yr 17	0017
Yr 18	0018
Yr 19	0019
Yr 20	0020
Yr 21	0021
Yr 22	0022
Yr 23	0023
Yr 24	0024
Yr 25	0025

## 5.19.01.01.13 - Net Claims Paid (non-cumulative) - Development year (absolute amount)

[illegible]

## 5.19.01.01.14 - Net Claims Paid (non-cumulative) - Current year, sum of years (cumulative)

[illegible]

## 5,19,01,01,15 - Net Undiscounted Best Estimate Claims Provisions - Development year (absolute amount)

[illegible]

## 5.19.01.01.16 - Net discounted Best Estimate Claims Provisions - Current year, sum of years (cumulative)

Share		
Face		
Rate of discount	0.0000	Interest-free financial lease (fixed business rate of interest is projected and estimated)
Present value of underlying asset	0.0000	Residual rate 0%
Carrying amount	0.0000	Residual value, discounted in connection with acquiring business
		Columns
		Year end of measurement date
		£ mil
Notes		
W10	W10	
W11	W11	
W12	W12	
W13	W13	
W14	W14	
W15	W15	
W16	W16	
W17	W17	
W18	W18	
W19	W19	
W20	W20	
W21	W21	
W22	W22	
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W142	W142	
W143	W143	
W144	W144	
W145	W145	
W146	W146	
W147	W147	
W148	W148	
W149	W149	
W150	W150	
W151	W151	
W152	W152	

## 5,19.01.01.17 - Net RBNS Claims - Development year (absolute amount)

[illegible]



5.03.03.03.10- Non RBCs (Dates - Current year, last of years (cumulative))

Item	
Asset	
Liability	
Equity	
Income	
Expense	

	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	2100	2101	2102	2103	2104	2105	2106	2107	2108	2109	2110	2111	2112	2113	2114	2115	2116	2117	2118	2119	2120	2121	2122	2123	2124	2125	2126	2127	2128	2129	2130	2131	2132	2133	2134	2135	2136	2137	2138	2139	2140	2141	2142	2143	2144	2145	2146	2147	2148	2149	2150	2151	2152	2153	2154	2155	2156	2157	2158	2159	2160	2161	2162	2163	2164	2165	2166	2167	2168	2169	2170	2171	2172	2173	2174	2175	2176	2177	2178	2179	2180	2181	2182	2183	2184	2185	2186	2187	2188	2189	2190	2191	2192	2193	2194	2195	2196	2197	2198	2199	2200	2201	2202	2203	2204	2205	2206	2207	2208	2209	2210	2211	2212	2213	2214	2215	2216	2217	2218	2219	2220	2221	2222	2223	2224	2225	2226	2227	2228	2229	2230	2231	2232	2233	2234	2235	2236	2237	2238	2239	2240	2241	2242	2243	2244	2245	2246	2247	2248	2249	2250	2251	2252	2253	2254	2255	2256	2257	2258	2259	2260	2261	2262	2263	2264	2265	2266	2267	2268	2269	2270	2271	2272	2273	2274	2275	2276	2277	2278	2279	2280	2281	2282	2283	2284	2285	2286	2287	2288	2289	2290	2291	2292	2293	2294	2295	2296	2297	2298	2299	2300	2301	2302	2303	2304	2305	2306	2307	2308	2309	2310	2311	2312	2313	2314	2315	2316	2317	2318	2319	2320	2321	2322	2323	2324	2325	2326	2327	2328	2329	2330	2331	2332	2333	2334	2335	2336	2337	2338	2339	2340	2341	2342	2343	2344	2345	2346	2347	2348	2349	2350	2351	2352	2353	2354	2355	2356	2357	2358	2359	2360	2361	2362	2363	2364	2365	2366	2367	2368	2369	2370	2371	2372	2373	2374	2375	2376	2377	2378	2379	2380	2381	2382	2383	2384	2385	2386	2387	2388	2389	2390	2391	2392	2393	2394	2395	2396	2397	2398	2399	2400	2401	2402	2403	2404	2405	2406	2407	2408	2409	2410	2411	2412	2413	2414	2415	2416	2417	2418	2419	2420	2421	2422	2423	2424	2425	2426	2427	2428	2429	2430	2431	2432	2433	2434	2435	2436	2437	2438	2439	2440	2441	2442	2443	2444	2445	2446	2447	2448	2449	2450	2451	2452	2453	2454	2455	2456	2457	2458	2459	2460	2461	2462	2463	2464	2465	2466	2467	2468	2469	2470	2471	2472	2473	2474	2475	2476	2477	2478	2479	2480	2481	2482	2483	2484	2485	2486	2487	2488	2489	2490	2491	2492	2493	2494	2495	2496	2497	2498	2499	2500	2501	2502	2503	2504	2505	2506	2507	2508	2509	2510	2511	2512	2513	2514	2515	2516	2517	2518	2519	2520	2521	2522	2523	2524	2525	2526	2527	2528	2529	2530	2531	2532	2533	2534	2535	2536	2537	2538	2539	2540	2541	2542	2543	2544	2545	2546	2547	2548	2549	2550	2551	2552	2553	2554	2555	2556	2557	2558	2559	2560	2561	2562	2563	2564	2565	2566	2567	2568	2569	2570	2571	2572	2573	2574	2575	2576	2577	2578	2579	2580	2581	2582	2583	2584	2585	2586	2587	2588	2589	2590	2591	2592	2593	2594	2595	2596	2597	2598	2599	2600	2601	2602	2603	2604	2605	2606	2607	2608	2609	2610	2611	2612	2613	2614	2615	2616	2617	2618	2619	2620	2621	2622	2623	2624	2625	2626	2627	2628	2629	2630	2631	2632	2633	2634	2635	2636	2637	2638	2639	2640	2641	2642	2643	2644	2645	2646	2647	2648	2649	2650	2651	2652	2653	2654	2655	2656	2657	2658	2659	2660	2661	2662	2663	2664	2665	2666	2667	2668	2669	2670	2671	2672	2673	2674	2675	2676	2677	2678	2679	2680	2681	2682	2683	2684	2685	2686	2687	2688	2689	2690	2691	2692	2693	2694	2695	2696	2697	2698	2699	2700	2701	2702	2703	2704	2705	2706	2707	2708	2709	2710	2711	2712	2713	2714	2715	2716	2717	2718	2719	2720	2721	2722	2723	2724	2725	2726	2727	2728	2729	2730	2731	2732	2733	2734	2735	2736	2737	2738	2739	2740	2741	2742	2743	2744	2745	2746	2747	2748	2749	2750	2751	2752	2753	2754	2755	2756	2757	2758	2759	2760	2761	2762	2763	2764	2765	2766	2767	2768	2769	2770	2771	2772	2773	2774	2775	2776	2777	2778	2779	2780	2781	2782	2783	2784	2785	2786	2787	2788	2789	2790	2791	2792	2793	2794	2795	2796	2797	2798	2799	2800	2801	2802	2803	2804	2805	2806	2807	2808	2809	2810	2811	2812	2813	2814	2815	2816	2817	2818	2819	2820	2821	2822	2823	2824	2825	2826	2827	2828	2829	2830	2831	2832	2833	2834	2835	2836	2837	2838	2839	2840	2841	2842	2843	2844	2845	2846	2847	2848	2849	2850	2851	2852	2853	2854	2855	2856	2857	2858	2859	2860	2861	2862	2863	2864	2865	2866	2867	2868	2869	2870	2871	2872	2873	2874	2875	2876	2877	2878	2879	2880	2881	2882	2883	2884	2885	2886	2887	2888	2889	2890	2891	2892	2893	2894	2895	2896	2897	2898	2899	2900	2901	2902	2903	2904	2905	2906	2907	2908	2909	2910	2911	2912	2913	2914	2915	2916	2917	2918	2919	2920	2921	2922	2923	2924	2925	2926	2927	2928	2929	2930	2931	2932	2933	2934	2935	2936	2937	2938	2939	2940	2941	2942	2943	2944	2945	2946	2947	2948	2949	2950	2951	2952	2953	2954	2955	2956	2957	2958	2959	2960	2961	2962	2963	2964	2965	2966	2967	2968	2969	2970	2971	2972	2973	2974	2975	2976	2977	2978	2979	2980	2981	2982	2983	2984	2985	2986	2987	2988	2989	2990	2991	2992	2993	2994	2995	2996	2997	2998	2999	3000	3001	3002	3003	3004	3005	3006	3007	3008	3009	3010	3011	3012	3013	3014	3015	3016	3017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# Non-life insurance claims

## 5.19.01.01.01 - Gross Claims Paid (non-cumulative) - Development year (absolute amount)

Sheet:	
Tab:	
Line of business	Other motor insurance (direct business and assigned proportional reinsurance)
Accident year / Underwriting year	2000
Currency	EUR
Currency conversion	Not applicable / Expressed in (contracted to) reporting currency

		Columns																																
		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
Rows		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
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S.19.01.01.08 - Reinsurance Recoveries received (non-cumulative) - Current year, sum of years (cumulative)

[illegible]

## S.19.01.01.09 - Undiscounted Best Estimate Claims Provisions - Reinsurance recoverable - Development year (absolute amount)

2	Row	
3	Order of business	Row 1
4	Account name / identifying code	Row 2
5	Company	Row 3
6	General description	Row 4

		Columns															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & 16	
Row	Order	Account	Company	General	General	General	General	General	General	General	General	General	General	General	General	General	
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	131																
	132																
	133																
	134																

## 5.19.01.01.10 - Discounted Best Estimate Claims Provisions - Reinsurance recoverable - Current year, sum of years (cumulative)

[illegible]

## S.19.01.01.11 - Reinsurance RBNS Claims - Development year (absolute amount)

[illegible]

5.19.01.01.12 - Reinsurance RBNS - Current year, sum of years (cumulative)

[illegible]

## 5.19.01.01.13 - Net Claims Paid (non-cumulative) - Development year (absolute amount)

12 weeks		
7 days		
Line of business	10000	Other motor insurance (direct business as awarded special tariff insurance)
Accident year / underwriting year	10000	Accident year [AT]
Currency	10000	USD
Carrying convention	10000	Not applicable / Exposure is purchased
		REPORTING CURRENCY

[illegible]

## 5.19.01.01.14 - Net Claims Paid (non-cumulative) - Current year, sum of years (cumulative)

[illegible]

5.19.01.01.15 - Net Undiscounted Best Estimate Claims Provisions - Development year (absolute amount)

12 month		
1 day		
Line of business	10001	Effect reinsurance (direct business an assumed proportional reinsurance)
Account year / underwriting year	10010	calendar year (AY)
Current	10011	NA
Reporting convention	10011	Not Applicable / Expressed in percentage of reporting currency

[illegible]

5.19.01.01.18 - Net discounted Best Estimate Claims Provisions - Current year, sum of years (cumulative)

Sheet1		
2 data		
Line of business	00000	Other water resources (direct business and associated professional services)
Account year / Underwriting year	0000	Calendar year (AY)
Currency	000	USD
Comments (optional)	00000	Not applicable / Exposed to (commented) SUBTYPE.SUBTYPE

		Columns	
		Year end (discouraged date)	1 Year
Items			
2009	00/00		
2010	00/00		
2011	00/00		
2012	00/00		
2013	00/00		
2014	00/00		
2015	00/00		
2016	00/00		
2017	00/00		
2018	00/00		
2019	00/00		
2020	00/00		
2021	00/00		
2022	00/00		
2023	00/00		
2024	00/00		
2025	00/00		
2026	00/00		
2027	00/00		
2028	00/00		
2029	00/00		
2030	00/00		
2031	00/00		
2032	00/00		
2033	00/00		
2034	00/00		
2035	00/00		
2036	00/00		
2037	00/00		
2038	00/00		
2039	00/00		
2040	00/00		
2041	00/00		
2042	00/00		
2043	00/00		
2044	00/00		
2045	00/00		
2046	00/00		
2047	00/00		
2048	00/00		
2049	00/00		
2050	00/00		
2051	00/00		
2052	00/00		
2053	00/00		
2054	00/00		
2055	00/00		
2056	00/00		
2057	00/00		
2058	00/00		
2059	00/00		
2060	00/00		
2061	00/00		
2062	00/00		
2063	00/00		
2064	00/00		
2065	00/00		
2066	00/00		
2067	00/00		
2068	00/00		
2069	00/00		
2070	00/00		
2071	00/00		
2072	00/00		
2073	00/00		
2074	00/00		
2075	00/00		
2076	00/00		
2077	00/00		
2078	00/00		
2079	00/00		
2080	00/00		
2081	00/00		
2082	00/00		
2083	00/00		
2084	00/00		
2085	00/00		
2086	00/00		
2087	00/00		
2088	00/00		
2089	00/00		
2090	00/00		
2091	00/00		
2092	00/00		
2093	00/00		
2094	00/00		
2095	00/00		
2096	00/00		
2097	00/00		
2098	00/00		
2099	00/00		
2100	00/00		
2101	00/00		
2102	00/00		
2103	00/00		
2104	00/00		
2105	00/00		
2106	00/00		
2107	00/00		
2108	00/00		
2109	00/00		
2110	00/00		
2111	00/00		
2112	00/00		
2113	00/00		

5.19.01.01.17 - Net RBNS Claims - Development year (absolute amount)

Line of business	20033
Accident year / underwriting year	20033
Currency	20033

[illegible]

5.18.01.01.18 – Net RBIG Claims – Current year, sum of years (cumulative)

Notes	
2 years	
Start of business	2000
End of business	2000
Current year	2000
Current year	2000

Columns	
Row	Value and (Projected RBIG)
1	2000
2	2000
3	2000
4	2000
5	2000
6	2000
7	2000
8	2000
9	2000
10	2000
11	2000
12	2000
13	2000
14	2000
15	2000
16	2000
17	2000
18	2000
19	2000
20	2000
21	2000
22	2000
23	2000
24	2000
25	2000
26	2000
27	2000
28	2000
29	2000
30	2000
31	2000
32	2000
33	2000
34	2000
35	2000
36	2000
37	2000
38	2000
39	2000
40	2000
41	2000
42	2000
43	2000
44	2000
45	2000
46	2000
47	2000
48	2000
49	2000
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51	2000
52	2000
53	2000
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57	2000
58	2000
59	2000
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62	2000
63	2000
64	2000
65	2000
66	2000
67	2000
68	2000
69	2000
70	2000
71	2000
72	2000
73	2000
74	2000
75	2000
76	2000
77	2000
78	2000
79	2000
80	2000
81	2000
82	2000
83	2000
84	2000
85	2000
86	2000
87	2000
88	2000
89	2000
90	2000
91	2000
92	2000
93	2000
94	2000
95	2000
96	2000
97	2000
98	2000
99	2000
100	2000

5.18.01.01.19 – Additional information: historic inflation rates (only in the case of using methods that take into account inflation to adjust data)

Notes	
2 years	
Start of business	2000
End of business	2000

Columns	
Row	Value
1	2000
2	2000
3	2000
4	2000
5	2000
6	2000
7	2000
8	2000
9	2000
10	2000
11	2000
12	2000
13	2000
14	2000
15	2000
16	2000
17	2000
18	2000
19	2000
20	2000
21	2000
22	2000
23	2000
24	2000
25	2000
26	2000
27	2000
28	2000
29	2000
30	2000
31	2000
32	2000
33	2000
34	2000
35	2000
36	2000
37	2000
38	2000
39	2000
40	2000
41	2000
42	2000
43	2000
44	2000
45	2000
46	2000
47	2000
48	2000
49	2000
50	2000
51	2000
52	2000
53	2000
54	2000
55	2000
56	2000
57	2000
58	2000
59	2000
60	2000
61	2000
62	2000
63	2000
64	2000
65	2000
66	2000
67	2000
68	2000
69	2000
70	2000
71	2000
72	2000
73	2000
74	2000
75	2000
76	2000
77	2000
78	2000
79	2000
80	2000
81	2000
82	2000
83	2000
84	2000
85	2000
86	2000
87	2000
88	2000
89	2000
90	2000
91	2000
92	2000
93	2000
94	2000
95	2000
96	2000
97	2000
98	2000
99	2000
100	2000

5.18.01.01.20 – Additional information: expected inflation rates

Notes	
2 years	
Start of business	2000
End of business	2000

Columns	
Row	Value
1	2000
2	2000
3	2000
4	2000
5	2000
6	2000
7	2000
8	2000
9	2000
10	2000
11	2000
12	2000
13	2000
14	2000
15	2000
16	2000
17	2000
18	2000
19	2000
20	2000
21	2000
22	2000
23	2000
24	2000
25	2000
26	2000
27	2000
28	2000
29	2000
30	2000
31	2000
32	2000
33	2000
34	2000
35	2000
36	2000
37	2000
38	2000
39	2000
40	2000
41	2000
42	2000
43	2000
44	2000
45	2000
46	2000
47	2000
48	2000
49	2000
50	2000
51	2000
52	2000
53	2000
54	2000
55	2000
56	2000
57	2000
58	2000
59	2000
60	2000
61	2000
62	2000
63	2000
64	2000
65	2000
66	2000
67	2000
68	2000
69	2000
70	2000
71	2000
72	2000
73	2000
74	2000
75	2000
76	2000
77	2000
78	2000
79	2000
80	2000
81	2000
82	2000
83	2000
84	2000
85	2000
86	2000
87	2000
88	2000
89	2000
90	2000
91	2000
92	2000
93	2000
94	2000
95	2000
96	2000
97	2000
98	2000
99	2000
100	2000

5.18.01.01.21 – Description of inflation rate used

Notes	
2 years	
Start of business	2000
End of business	2000

Columns	
Row	Value
1	2000
2	2000
3	2000
4	2000
5	2000
6	2000
7	2000
8	2000
9	2000
10	2000
11	2000
12	2000
13	2000
14	2000
15	2000
16	2000
17	2000
18	2000
19	2000
20	2000
21	2000
22	2000
23	2000
24	2000
25	2000
26	2000
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34	2000
35	2000
36	2000
37	2000
38	2000
39	2000
40	2000
41	2000
42	2000
43	2000
44	2000
45	2000
46	2000
47	2000
48	2000
49	2000
50	2000
51	2000
52	2000
53	2000
54	2000
55	2000
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57	2000
58	2000
59	2000
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61	2000
62	2000
63	2000
64	2000
65	2000
66	2000
67	2000
68	2000
69	2000
70	2000
71	2000
72	2000
73	2000
74	2000
75	2000
76	2000
77	2000
78	2000
79	2000
80	2000
81	2000
82	2000
83	2000
84	2000
85	2000
86	2000
87	2000
88	2000
89	2000
90	2000
91	2000
92	2000
93	2000
94	2000
95	2000
96	2000
97	2000
98	2000
99	2000
100	2000

## Non-life insurance claims

5.19.01.01.01 - Gross Claims Paid (non-cumulative) - Development year (absolute amount)

Line of business	29050	Fire and other damage to property insurance (direct business and accepted proportional reinsurance)
Accident year / underwriting year	29060	Accident year (AY)
Currency	29090	USD
Currency conversion	29099	Not applicable / Expressed in (converted to) reporting currency

		Columns															
		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
		Column	Column	Column	Column	Column	Column	Column	Column	Column	Column	Column	Column	Column	Column	Column	Column
Row	0																
Row	1																
Row	2																
Row	3																
Row	4																
Row	5																
Row	6																
Row	7																
Row	8																
Row	9																
Row	10																
Row	11																
Row	12																
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Row	14																
Row	15																
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Row	27																
Row	28																
Row	29																
Row	30																
Row	31																
Row	32																
Row	33																
Row	34																
Row	35																
Row	36																
Row	37																

5.19.01.01.02 - Gross Claims Paid (non-cumulative) - Current year, sum of years (cumulative)

Sheets		
Z Axis:		
Line of business:	20000	Fire and other damage to property insurance (direct business and accepted proportional reinsurance)
Accident year / Underwriting year	00000	Accident year (AY)
Currency	00000	(USD)
Currency conversion	20000	Not applicable / Expressed in (converted to) respective currency

		Columns	
		in Current year	Sum of years (produced)
		1990-94	1990-94
Price	1990-94		
19.10	1990-94		
19.11	1990-94		
19.12	1990-94		
19.13	1990-94		
19.14	1990-94		
19.15	1990-94		
19.16	1990-94		
19.17	1990-94		
19.18	1990-94		
19.19	1990-94		
19.20	1990-94		
19.21	1990-94		
19.22	1990-94		
19.23	1990-94		
19.24	1990-94		
19.25	1990-94		
19.26	1990-94		
19.27	1990-94		
19.28	1990-94		
19.29	1990-94		
19.30	1990-94		
19.31	1990-94		
19.32	1990-94		
19.33	1990-94		
19.34	1990-94		
19.35	1990-94		
19.36	1990-94		
19.37	1990-94		
19.38	1990-94		
19.39	1990-94		
19.40	1990-94		
19.41	1990-94		
19.42	1990-94		
19.43	1990-94		
19.44	1990-94		
19.45	1990-94		
19.46	1990-94		
19.47	1990-94		
19.48	1990-94		
19.49	1990-94		
19.50	1990-94		
19.51	1990-94		
19.52	1990-94		
19.53	1990-94		
19.54	1990-94		
19.55	1990-94		
19.56	1990-94		
19.57	1990-94		
19.58	1990-94		
19.59	1990-94		
19.60	1990-94		
19.61	1990-94		
19.62	1990-94		
19.63	1990-94		
19.64	1990-94		
19.65	1990-94		
19.66	1990-94		
19.67	1990-94		
19.68	1990-94		
19.69	1990-94		
19.70	1990-94		
19.71	1990-94		
19.72	1990-94		
19.73	1990-94		
19.74	1990-94		
19.75	1990-94		
19.76	1990-94		
19.77	1990-94		
19.78	1990-94		
19.79	1990-94		
19.80	1990-94		
19.81	1990-94		
19.82	1990-94		
19.83	1990-94		
19.84	1990-94		
19.85	1990-94		
19.86	1990-94		
19.87	1990-94		
19.88	1990-94		
19.89	1990-94		
19.90	1990-94		
19.91	1990-94		
19.92	1990-94		
19.93	1990-94		
19.94	1990-94		
19.95	1990-94		
19.96	1990-94		
19.97	1990-94		
19.98	1990-94		
19.99	1990-94		
20.00	1990-94		
20.01	1990-94		
20.02	1990-94		
20.03	1990-94		
20.04	1990-94		
20.05	1990-94		
20.06	1990-94		
20.07	1990-94		
20.08	1990-94		
20.09	1990-94		
20.10	1990-94		
20.11	1990-94		
20.12	1990-94		
20.13	1990-94		
20.14	1990-94		
20.15	1990-94		
20.16	1990-94		
20.17	1990-94		
20.18	1990-94		
20.19	1990-94		
20.20	1990-94		
20.21	1990-94		
20.22	1990-94		
20.23	1990-94		
20.24	1990-94		
20.25	1990-94		
20.26	1990-94		
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20.30	1990-94		
20.31	1990-94		
20.32	1990-94		
20.33	1990-94		
20.34	1990-94		
20.35	1990-94		
20.36	1990-94		
20.37	1990-94		
20.38	1990-94		
20.39	1990-94		
20.40	1990-94		
20.41	1990-94		
20.42	1990-94		
20.43	1990-94		
20.44	1990-94		
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20.53	1990-94		
20.54	1990-94		
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20.56	1990-94		
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20.58	1990-94		
20.59	1990-94		
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20.61	1990-94		
20.62	1990-94		
20.63	1990-94		
20.64	1990-94		
20.65	1990-94		
20.66	1990-94		
20.67	1990-94		
20.68	1990-94		
20.69	1990-94		
20.70	1990-94		
20.71	1990-94		
20.72	1990-94		
20.73	1990-94		
20.74	1990-94		
20.75	1990-94		
20.76	1990-94		
20.77	1990-94		
20.78	1990-94		
20.79	1990-94		
20.80	1990-94		
20.81	1990-94		
20.82	1990-94		
20.83	1990-94		
20.84	1990-94		
20.85	1990-94		
20.86	1990-94		
20.87	1990-94		
20.88	1990-94		
20.89	1990-94		
20.90	1990-94		
20.91	1990-94		
20.92	1990-94		
20.93	1990-94		
20.94	1990-94		
20.95	1990-94		
20.96	1990-94		
20.97	1990-94		
20.98	1990-94		
20.99	1990-94		
21.00	1990-94		
21.01	1990-94		
21.02	1990-94		
21.03	1990-94		
21.04	1990-94		
21.05	1990-94		
21.06	1990-94		
21.07	1990-94		
21.08	1990-94		
21.09	1990-94		
21.10	1990-94		
21.11	1990-94		
21.12	1990-94		
21.13	1990-94		
21.14	1990-94		
21.15	1990-94		
21.16	1990-94		
21.17	1990-94		
21.18	1990-94		
21.19	1990-94		
21.20	1990-94		
21.21	1990-94		
21.22	1990-94		
21.23	1990-94		
21.24	1990-94		
21.25	1990-94		
21.26	1990-94		
21.27	1990-94		
21.28	1990-94		
21.29	1990-94		
21.30	1990-94		
21.31	1990-94		
21.32	1990-94		
21.33	1990-94		
21.34	1990-94		
21.35	1990-94		
21.36	1990-94		
21.37	1990-94		
21.38	1990-94		
21.39	1990-94		
21.40	1990-94		
21.41	1990-94		
21.42	1990-94		
21.43	1990-94		
21.44	1990-94		
21.45	1990-94		
21.46	1990-94		
21.47	1990-94		
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21.49	1990-94		
21.50	1990-94		
21.51	1990-94		
21.52	1990-94		
21.53	1990-94		
21.54	1990-94		
21.55	1990-94		
21.56	1990-94		
21.57	1990-94		
21.58	1990-94		
21.59	1990-94		
21.60	1990-94		
21.61	1990-94		
21.62	1990-94		
21.63	1990-94		
21.64	1990-94		
21.65	1990-94		
21.66	1990-94		
21.67	1990-94		
21.68	1990-94		
21.69	1990-94		
21.70	1990-94		
21.71	1990-94		
21.72	1990-94		
21.73	1990-94		
21.74	1990-94		
21.75	1990-94		
21.76	1990-94		
21.77	1990-94		
21.78	1990-94		
21.79	1990-94		
21.80	1990-94		
21.81	1990-94		
21.82	1990-94		
21.83	1990-94		
21.84	1990-94		
21.85	1990-94		
21.86	1990-94		
21.87	1990-94		
21.88	1990-94		
21.89	1990-94		
21.90	1990-94		
21.91	1990-94		
21.92	1990-94		
21.93	1990-94		
21.94	1990-94		
21.95	1990-94		
21.96	1990-94		
21.97	1990-94		
21.98	1990-94		
21.99	1990-94		
22.00	1990-94		
22.01	1990-94		
22.02	1990-94		
22.03	1990-94		
22.04	1990-94		
22.05	1990-94		
22.06	1990-94		
22.07	1990-94		
22.08	1990-94		
22.09	1990-94		
22.10	1990-94		
22.11	1990-94		
22.12	1990-94		
22.13	1990-94		
22.14	1990-94		
22.15	1990-94		
22.16	1990-94		
22.17	1990-94		
22.18	1990-94		
22.19	1990-94		
22.20	1990-94		
22.21	1990-94		
22.22	1990-94		
22.23	1990-94		
22.24	1990-94		
22.25	1990-94		
22.26	1990-94		
22.27	1990-94		
22.28	1990-94		
22.29	1990-94		
22.30	1990-94		
22.31	1990-94		
22.32	1990-94		
22.33	1990-94		
22.34	1990-94		
22.35	1990-94		
22.36	1990-94		
22.37	1990-94		
22.38	1990-94		
22.39	1990-94		
22.40	1990-94		
22.41	1990-94		
22.42	1990-94		
22.43	1990-94		
22.44	1990-94		
22.45	1990-94		
22.46	1990-94		
22.47	1990-94		
22.48	1990-94		
22.49	1990-94		
22.50	1990-94		
22.51	1990-94		
22.52	1990-94		
22.53	1990-94		
22.54	1990-94		
22.55	1990-94		
22.56	1990-94		
22.57	1990-94		
22.58	1990-94		
22.59	1990-94		
22.60	1990-94		
22.61	1990-94		
22.62	1990-94		
22.63	1990-94		
22.64	1990-94		
22.65	1990-94		
22.66	1990-94		
22.67	1990-94		
22.68	1990-94		
22.69	1990-94		
22.70	1990-94		

S.19.01.01.03 - Gross undiscounted Best Estimate Claims Provisions - Development year (absolute amount)

Sheets	
2 Axis	
Line of business	20000 Fire and other damage to property insurance [direct business and accepted proportional reinsurance]
Accident year / underwriting year	20000 Accident year (AY)
Currency	20000 USD
Currency conversion	20000 Not applicable / Expressed in (converted to) reporting currency

[illegible]

## 5.19.01.01.04 - Gross discounted Best Estimate Claims Provisions - Current year, sum-of-years (cumulative)

Year(s)		
7. Date		
Line of business	2000	Fire and other damage to property insured (Direct business and assumed reinsurance)
Assured year / Underwriting year	2000	Underwriting (20)
Currency	2000	(10)
Contract category	2000	Not applicable. Reported as part of reinsurance

		Columns	
		Year and physical book dates	
		Index	
Page			
1-10	1000		
11-20	2000		
21-30	3000		
31-40	4000		
41-50	5000		
51-60	6000		
61-70	7000		
71-80	8000		
81-90	9000		
91-100	10000		
101-110	11000		
111-120	12000		
121-130	13000		
131-140	14000		
141-150	15000		
151-160	16000		
161-170	17000		
171-180	18000		
181-190	19000		
191-200	20000		
201-210	21000		
211-220	22000		
221-230	23000		
231-240	24000		
241-250	25000		
251-260	26000		
261-270	27000		
271-280	28000		
281-290	29000		
291-300	30000		
301-310	31000		
311-320	32000		
321-330	33000		
331-340	34000		
341-350	35000		
351-360	36000		
361-370	37000		
371-380	38000		
381-390	39000		
391-400	40000		
401-410	41000		
411-420	42000		
421-430	43000		
431-440	44000		
441-450	45000		
451-460	46000		
461-470	47000		
471-480	48000		
481-490	49000		
491-500	50000		
501-510	51000		
511-520	52000		
521-530	53000		
531-540	54000		
541-550	55000		
551-560	56000		
561-570	57000		
571-580	58000		
581-590	59000		
591-600	60000		
601-610	61000		
611-620	62000		
621-630	63000		
631-640	64000		
641-650	65000		
651-660	66000		
661-670	67000		
671-680	68000		
681-690	69000		
691-700	70000		
701-710	71000		
711-720	72000		
721-730	73000		
731-740	74000		
741-750	75000		
751-760	76000		
761-770	77000		
771-780	78000		
781-790	79000		
791-800	80000		
801-810	81000		
811-820	82000		
821-830	83000		
831-840	84000		
841-850	85000		
851-860	86000		
861-870	87000		
871-880	88000		
881-890	89000		
891-900	90000		
901-910	91000		
911-920	92000		
921-930	93000		
931-940	94000		
941-950	95000		
951-960	96000		
961-970	97000		
971-980	98000		

5.19.01.01.05 - Gross Reported but not Settled Claims (RBND) - Development year (absolute amount)

Years		
From		
		Fire and other damage to property insured (direct business and accepted proportion)
Year of incident	2000	Uninsured
Accident year / underwriting year	2000	Accident year (AY)
Current	2000	AY
		Not applicable / Exposed to covered

Figure 1 is a Gantt chart illustrating the project schedule for the construction of a new building. The chart displays the duration of various tasks across a timeline from 0 to 36 months. The tasks are represented by horizontal bars of different colors, indicating their start and end dates. The tasks include: Design (0-12 months), Foundation (0-12 months), Structure (0-12 months), Roofing (0-12 months), Interior (0-12 months), Exterior (0-12 months), Landscaping (0-12 months), and Final Inspection (0-12 months). The chart shows that most tasks are completed within the first 12 months, with some tasks like Landscaping and Final Inspection extending to 36 months.

## \$18,01,01,06 - Gross Reported but not Settled Claims (RBNS) - Current year; sum of years (cumulative)

<b>Line of business</b>	<b>NAICS</b>	Fire and other damage to property insurance direct business and assigned properties reinsurance
<b>Fiscal year / calendar year</b>	<b>NAICS</b>	Calendar year (y0)
<b>Category</b>	<b>NAICS</b>	(-)/0
		Not applicable / segment is nonfinancial

		Columns	
		Year and calendar week dates	Labels
Price			
Price		2008.0	
20-12		2008.52	
10-12		2009.0	
30-11		2009.48	
20-11		2009.96	
10-11		2010.44	
30-10		2010.92	
20-10		2011.40	
10-10		2011.88	
30-09		2012.36	
20-09		2012.84	
10-09		2013.32	
30-08		2013.80	
20-08		2014.28	
10-08		2014.76	
30-07		2015.24	
20-07		2015.72	
10-07		2016.20	
30-06		2016.68	
20-06		2017.16	
10-06		2017.64	
30-05		2018.12	
20-05		2018.60	
10-05		2019.08	
30-04		2019.56	
20-04		2020.04	
10-04		2020.52	
30-03		2021.00	
20-03		2021.48	
10-03		2021.96	
30-02		2022.44	
20-02		2022.92	
10-02		2023.40	
30-01		2023.88	
20-01		2024.36	
10-01		2024.84	
30-12		2025.32	
20-12		2025.80	
10-12		2026.28	
30-11		2026.76	
20-11		2027.24	
10-11		2027.72	
30-10		2028.20	
20-10		2028.68	
10-10		2029.16	
30-09		2029.64	
20-09		2030.12	
10-09		2030.60	
30-08		2031.08	
20-08		2031.56	
10-08		2032.04	
30-07		2032.52	
20-07		2033.00	
10-07		2033.48	
30-06		2033.96	
20-06		2034.44	
10-06		2034.92	
30-05		2035.40	
20-05		2035.88	
10-05		2036.36	
30-04		2036.84	
20-04		2	

## 3.19.01.01.07 - Refinance Recoveries received (non-cumulative) - Development year (Absolute amount)

Year of graduation	2010
Academic year / Underwriting year	2010
Examining	2010
Examining	2010

Activity	Start Week	End Week
Mobilization	1	2
Foundation	3	4
Structural Steel	5	12
Concrete Slabs	13	20
Mechanical/Electrical/HVAC	21	28
Interior Finishes	29	34
Commissioning	35	36

## 5.19.01.01.08 - Reinsurance Recoveries received (non-cumulative) - Current year, sum of years (cumulative)

Sheets:	
Z Axis:	
Use of System:	2001
Accident year / Underwriting year:	2001
Currency:	2001
Comments:	

		Columns	
		In Current year	Sum of years from last year
		COF00	COF70
Br00	COF00		
Br00	COF00		
Br 01	COF01		
Br 02	COF02		
Br 03	COF03		
Br 04	COF04		
Br 05	COF05		
Br 06	COF06		
Br 07	COF07		
Br 08	COF08		
Br 09	COF09		
Br 10	COF10		
Br 11	COF11		
Br 12	COF12		
Br 13	COF13		
Br 14	COF14		
Br 15	COF15		
Br 16	COF16		
Br 17	COF17		
Br 18	COF18		
Br 19	COF19		
Br 20	COF20		
Br 21	COF21		
Br 22	COF22		
Br 23	COF23		
Br 24	COF24		
Br 25	COF25		
Br 26	COF26		
Br 27	COF27		
Br 28	COF28		
Br 29	COF29		
Br 30	COF30		
Br 31	COF31		
Br 32	COF32		
Br 33	COF33		
Br 34	COF34		
Br 35	COF35		
Br 36	COF36		
Br 37	COF37		
Br 38	COF38		
Br 39	COF39		
Br 40	COF40		
Br 41	COF41		
Br 42	COF42		
Br 43	COF43		
Br 44	COF44		
Br 45	COF45		
Br 46	COF46		
Br 47	COF47		
Br 48	COF48		
Br 49	COF49		
Br 50	COF50		
Br 51	COF51		
Br 52	COF52		
Br 53	COF53		
Br 54	COF54		
Br 55	COF55		
Br 56	COF56		
Br 57	COF57		
Br 58	COF58		
Br 59	COF59		
Br 60	COF60		
Br 61	COF61		
Br 62	COF62		
Br 63	COF63		
Br 64	COF64		
Br 65	COF65		
Br 66	COF66		
Br 67	COF67		
Br 68	COF68		
Br 69	COF69		
Br 70	COF70		
Br 71	COF71		
Br 72	COF72		
Br 73	COF73		
Br 74	COF74		
Br 75	COF75		
Br 76	COF76		
Br 77	COF77		
Br 78	COF78		
Br 79	COF79		
Br 80	COF80		
Br 81	COF81		
Br 82	COF82		
Br 83	COF83		
Br 84	COF84		
Br 85	COF85		
Br 86	COF86		
Br 87	COF87		
Br 88	COF88		
Br 89	COF89		
Br 90	COF90		
Br 91	COF91		
Br 92	COF92		
Br 93	COF93		
Br 94	COF94		
Br 95	COF95		
Br 96	COF96		
Br 97	COF97		
Br 98	COF98		
Br 99	COF99		
Br 100	COF100		

## S.19.01.01.09 - Undiscounted Best Estimate Claims Provisions - Reinsurance recoverable - Development year (absolute amount)

Line of business	79030
Accident year / underwriting year	20030
Cumulative	20030
Current	20030

[illegible]

S.19.01.01.10 - Discounted Best Estimate Claims Provisions - Reinsurance recoverable - Current year, sum of years (cumulative)

Sheets	
2 Axis	
Use of business	10010
Accident year / underwriting year	10010
Currency	10010
Company	10010

[illegible]

## 5.19.01.01.11 - Reinsurance RBN Claims - Development year (absolute amount)

Line of business	10010
Accident year / underwriting year	20020
Currency	10010

[illegible]

## 5.19.01.01.12 - Reinsurance RBNS - Current year, sum of years (cumulative)

Line of business	10011
Accident year / Underwriting year	10010
Currency	10010
Currency conversion	10010

		Columns
		Year and observation date
		1998
Area		
Area		00000
No 18		00000
No 13		00015
No 12		00015
No 11		00030
No 10		00015
No 9		00000
No 8		00015
No 7		00000
No 6		00000
No 5		00000
No 4		00000
No 3		00000
No 2		00000
No 1		00000
No		00000
Area		

## 5.19.01.01.13 - Net Claims Paid (non-cumulative) - Development year (absolute amount)

Sheets	
7.2.2.2	
	Fire and other damage to property insured (direct business and accepted proportional reinsurance)
Line of business	EMSA
Account year / underwriting year	EMSA
Currency	EUR
	Not applicable / expressed in (converted to)

[illegible]

## 5,19,01,01,34 - Net Claims Paid (non-cumulative) - Current year, sum of years (cumulative)

Sheets	
2 Date:	
Line of business	SW00 Fire and other damage to property insured (Direct business and accepted proportional reinsurance)
Accident year / Underwriting year	SW01 Accident year (AY)
Currency	USD
	Not applicable / Expressed in (currency)

[illegible]

## 5.19.01.01.15 - Net Undiscounted Best Estimate Claims Provisions - Development year (absolute amount)

Line of business	0001	Fire and other damage to property insured (direct business and accepted proportional reinsurance)
Accident year / underwriting year	0002	Accident year (AY)
Currency	0003	USD
Currency conversion	0004	Not applicable / Expressed in (converted) reporting currency

		Columns															
		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Row																	
0	0																
1	1																
2	2																
3	3																
4	4																
5	5																
6	6																
7	7																
8	8																
9	9																
10	10																
11	11																
12	12																
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27	27																
28	28																
29	29																
30	30																
31	31																
32	32																
33	33																
34	34																
35	35																
36	36																
37	37																

## 5.19.01.01.16 - Net discounted Best Estimate Claims Provisions - Current year, sum of years (cumulative)

Sheets		
7.4.2.1		
Line of business	0000	Fire and other damage to property insured (direct business and accepted proportional reinsurance)
Accident year / Underwriting year	0000	Accident year (AY)
Currency	USD	
Currency conversion	0000	Not applicable / expressed in (powered) local currency

[illegible]

5.19.01.01.17 - Net R&D Claims - Development year (absolute amount)

Line of business	INSUR	Fire and other damage to property insured (direct business and accepted proportional reinsurance)
Accident year / underwriting year	INCAL	Accident year (AN)
Currency	INCUS	USD
		Not applicable / Expressed in (converted) to

[illegible]

5.19.01.01.18 - Net RISKS Claims - Current year, sum of years (cumulative)

Assets		
Cash		
Accounts receivable		
Inventory		
Prepaid expenses		
Land		
Buildings		
Equipment		
Accumulated depreciation		
Intangible assets		
Other assets		
Liabilities		
Accounts payable		
Notes payable		
Long-term debt		
Deferred tax liabilities		
Other liabilities		
Equity		
Common stock		
Retained earnings		
Other equity		

## S.19.01.01.19 - Additional information; historic inflation rates (only in the case of using methods that take into account inflation to adjust data)

[illegible]

5.19.01.01.20 - Additional information: expected inflation rates

[illegible]

## 5.19.01.01.21 - Description of inflation rate used

Sheet1

Year		
Line of business	19850	
Currency	12030	

Columns

19850		
12030		

Row

19850		
12030		



## Own funds

### 5.23.01.01.01 - Own funds

Rows	Columns				
	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35					
Ordinary share capital (gross of own shares)	00010	7,490,000.00	7,490,000		
Share premium account related to ordinary share capital	00020				
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	00030				
Subordinated mutual member accounts	00040				
Surplus funds	00050				
Preference shares	00060				
Share premium account related to preference shares	00070				
Reconciliation reserve	00080	23,278.883	23,278.883		
Subordinated liabilities	00090				
An amount equal to the value of net deferred tax assets	00100				
Other own fund items approved by the supervisory authority as basic own funds not specified above	00110				
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					
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	00120				
Deductions					
Deductions for participations in financial and credit institutions	00130				
Total basic own funds after deductions	00140	30,768.883	30,768.883		
Ancillary own funds					
Unpaid and uncalled ordinary share capital callable on demand	00150				
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	00160				
Unpaid and uncalled preference shares callable on demand	00170				
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	00180				
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	00190				
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	00200				
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	00210				
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	00220				
Other ancillary own funds	00230				
Total ancillary own funds	00240				
Available and eligible own funds					
Total available own funds to meet the SCR	00250	30,768.883	30,768.883		
Total available own funds to meet the MCR	00260	30,768.883	30,768.883		
Total eligible own funds to meet the SCR	00270	30,768.883	30,768.883		
Total eligible own funds to meet the MCR	00280	30,768.883	30,768.883		
SCR	00290	14,355,278			
MCR	00300	5,801,042			
Ratio of Eligible own funds to SCR	00310	214.41%			
Ratio of Eligible own funds to MCR	00320	530.40%			

## Detailed information by tiers on own funds

### 5.23.02.01.01 - Basic own funds

Rows	Columns					
	Total	Tier 1	Of which counted under transitional	Tier 2	Of which counted under transitional	Tier 3
	C0010	C0020	C0030	C0040	C0050	C0060
Ordinary share capital						
Paid in	00010					
Called up but not yet paid in	00020	7,490,000	7,490,000			
Own shares held	00030					
Total ordinary share capital	00040	7,490,000	7,490,000			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	00050					
Paid in	00060					
Called up but not yet paid in	00070					
Total initial fund members' contributions or the equivalent basic own fund item for mutual and mutual-type undertakings	00080					
Subordinated mutual member accounts	00090					
Dated subordinated	00100					
Undated subordinated with a call option	00110					
Undated subordinated with no contractual opportunity to redeem	00120					
Total subordinated mutual member accounts	00130					
Preference shares	00140					
Dated preference shares	00150					
Undated preference shares with a call option	00160					
Undated preference shares with no contractual opportunity to redeem	00170					
Total preference shares	00180					
Subordinated liabilities	00190					
Dated subordinated liabilities	00200					
Undated subordinated liabilities with a contractual opportunity to redeem	00210					
Undated subordinated liabilities with no contractual opportunity to redeem	00220					
Total subordinated liabilities	00230					

### 5.23.02.01.02 - Ancillary own funds

Rows	Columns			
	Tier 2	Tier 3		
	Initial amounts approved	Current amounts	Initial amounts approved	Current amounts
	C0070	C0080	C0090	C0100
Ancillary own funds				
Items for which an amount was approved	00010			
Items for which a method was approved	00020			



#### Solvency Capital Requirement - for undertakings on Standard Formula

##### 5.25.01.01.01 - Basic Solvency Capital Requirement

Sheets  
2 Axis  
Article 132

	Columns		
	Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RIF and matching adjustments
	C0010	C0010	C0010
Rows			
Market risk	00000	001,213	001,213
Counterparty default risk	00000	2,295,740	2,295,740
Life underwriting risk	00000		
Health underwriting risk	00000	12,056,063	12,056,063
Non-life underwriting risk	00000	12,056,063	12,056,063
Downside risk	00000	1,340,179	1,340,179
Intangible asset risk	00000		
Basic Solvency Capital Requirement	00000	15,392,882	15,392,882

##### 5.25.01.01.02 - Calculation of Solvency Capital Requirement

Sheets  
2 Axis  
Article 132

	Columns	
	Value	C0010
Rows		
Adjustment due to RIF/MAP - RIF aggregation	00000	
Operational risk	00000	757,500
Loss absorbing capacity of deferred taxes	00000	
Capital requirement for business operated in accordance with Art. 4 of Directive 2009/65/EC	00000	
Solvency Capital Requirement excluding capital add-on	00000	14,595,275
Capital add-on already set	00000	
Solvency capital requirement	00000	14,595,275
Other information on SCR	00000	
Capital requirement for duration-based equity risk sub-module	00000	
Total amount of National Solvency Capital Requirements for remaining part	00000	
Total amount of National Solvency Capital Requirements for ring-fenced funds	00000	
Total amount of National Solvency Capital Requirements for matching adjustment	00000	
proportion	00000	
Disproportion effect due to RIF risk aggregation for Article 134	00000	
Without need to calculate the adjustment due to RIF/MAP - RIF aggregation	00000	
Net future discretionary benefits	00000	

##### 5.25.01.01.03 - Approach to tax rate

Sheets  
2 Axis  
Article 132

	Columns	
	Yes/No	C0010
Rows		
Approach based on average tax rate	00000	

##### 5.25.01.01.04 - Calculation of loss absorbing capacity of deferred taxes

Sheets  
2 Axis  
Article 132

	Columns	
	Before the shock	After the shock
	C0010	C0010
Rows		
DTA	00000	
DTA carry forward	00000	
DTA due to deductible temporary differences	00000	
DTL	00000	
LAC DT	00000	
LAC DT justified by reversion of deferred tax liabilities	00000	
LAC DT justified by reference to probable future taxable economic profit	00000	
LAC DT justified by carry back, current year	00000	
LAC DT justified by carry back, future years	00000	
Maximum LAC DT	00000	

##### 5.25.01.01.05 - Calculation of loss absorbing capacity of deferred taxes

Sheets  
2 Axis  
Article 132

	Columns	
	LAC DT	C0010
Rows		
DTA	00000	
DTA carry forward	00000	
DTA due to deductible temporary differences	00000	
DTL	00000	
LAC DT	00000	
LAC DT justified by reversion of deferred tax liabilities	00000	
LAC DT justified by reference to probable future taxable economic profit	00000	
LAC DT justified by carry back, current year	00000	
LAC DT justified by carry back, future years	00000	
Maximum LAC DT	00000	

#### Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

##### 5.28.01.01.01 - Linear formula component for non-life insurance and reinsurance obligations

	Columns	
	MCR components	C0010
Rows		
MCRNL Result	00000	5,801,042

##### 5.28.01.01.02 - Background information

	Columns	
	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
	C0010	C0010
Rows		
Medical expense insurance and proportional reinsurance	00000	
Income protection insurance and proportional reinsurance	00000	
Workers' compensation insurance and proportional reinsurance	00000	
Motor vehicle liability insurance and proportional reinsurance	00000	
Other motor insurance and proportional reinsurance	00000	15,626,793
Marine, aviation and transport insurance and proportional reinsurance	00000	
Fire and other damage to property insurance and proportional reinsurance	00000	1,467,507
General liability insurance and proportional reinsurance	00000	
Credit and suretyship insurance and proportional reinsurance	00000	
Legal expenses insurance and proportional reinsurance	00000	
Assistance and proportional reinsurance	00000	
Miscellaneous financial loss insurance and proportional reinsurance	00000	8,152,225
Non-proportional health reinsurance	00000	
Non-proportional casualty reinsurance	00000	
Non-proportional marine, aviation and transport reinsurance	00000	
Non-proportional property reinsurance	00000	

##### 5.28.01.01.03 - Linear formula component for life insurance and reinsurance obligations

	Columns	
	Yes/No	C0010
Rows		
MCR Result	00000	

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

	Columns	
	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
	C0010	C0010
Rows		
Obligations with profit participation - guaranteed benefits	00000	
Obligations with profit participation - future discretionary benefits	00000	
Index-linked and unit-linked insurance obligations	00000	
Other life (re)insurance and health (re)insurance obligations	00000	
Total capital at risk for all life (re)insurance obligations	00000	

##### 5.28.01.01.05 - Overall MCR calculation

	Columns	
	LAC DT	C0010
Rows		
Linear MCR	00000	5,801,042
SCR	00000	14,193,178
MCR cap	00000	6,437,625
MCR floor	00000	3,587,569
Combined MCR	00000	5,801,042
Absolute floor of the MCR	00000	2,808,500
Minimum Capital Requirement	00000	5,801,042