



# Methodist Insurance PLC

## Solvency and Financial Condition Report

31 December 2018
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# Contents

<b>Executive Summary .....</b>	<b>4</b>
<b>Directors Statement .....</b>	<b>7</b>
<b>A. Business and performance .....</b>	<b>8</b>
A.1 Business details and group structure.....	8
A.2 Performance from underwriting activities.....	10
A.3 Performance from investment activities.....	11
A.4 Performance from other activities .....	12
A.5 Any other information.....	12
<b>B. System of governance .....</b>	<b>13</b>
B.1 General information on the system of governance .....	13
B.2 Fit and proper requirements .....	18
B.3 Risk management system including the ORSA .....	19
B.4 Internal control system.....	23
B.5 Internal audit function.....	24
B.6 Actuarial function .....	25
B.7 Outsourcing.....	26
B.8 Any other information.....	27
<b>C. Risk Profile.....</b>	<b>28</b>
C.1 Underwriting Risk.....	28
C.2 Market risk .....	30
C.3 Credit risk.....	32
C.4 Liquidity risk .....	33
C.5 Operational risk.....	34
C.6 Other material risks.....	35
C.7 Any other information.....	35
<b>D. Valuation for solvency purposes .....</b>	<b>36</b>
D.1 Assets .....	37
D.2 Technical provisions .....	38
D.3 Other liabilities .....	42
D.4 Alternative methods for valuation .....	43
D.5 Any other information.....	43
<b>E. Capital Management.....</b>	<b>44</b>
E.1 Own funds.....	44

E.2	Solvency Capital Requirement [SCR] & Minimum Capital Requirement [MCR] .....	48
E.3	Use of the duration-based equity risk sub-module in the calculation of the SCR.....	49
E.4	Differences between the standard formula and the internal model .....	49
E.5	Non-compliance with the MCR and non-compliance with the SCR .....	49
E.6	Any other information.....	49
<b>Appendix 1 – QRT S.02.01.02 Balance Sheet .....</b>		<b>50</b>
<b>Appendix 2 – QRT S.05.01.02 Non-life premiums, claims and expenses by line of business .....</b>		<b>52</b>
<b>Appendix 3 – QRT S.05.02.01 Non-life premiums, claims and expenses by country .....</b>		<b>53</b>
<b>Appendix 4 – QRT S.17.01.02 Non-life technical provisions.....</b>		<b>54</b>
<b>Appendix 5 – QRT S.19.01.21 Non-life insurance claims .....</b>		<b>55</b>
<b>Appendix 6 – QRT S.23.01.01 Own Funds .....</b>		<b>56</b>
<b>Appendix 7 – QRT S.25.01.21 Solvency Capital Requirement .....</b>		<b>57</b>
<b>Appendix 8 – QRT S.28.01.01 Minimum Capital Requirement .....</b>		<b>58</b>
<b>Appendix 9 – Glossary of abbreviations.....</b>		<b>59</b>

## Executive Summary

### *Introduction*

This Solvency and Financial Condition Report (SFCR) has been prepared in line with the requirements of the Solvency II (SII) Regulations, to assist the customers, business partners and shareholders of Methodist Insurance PLC (the Company) and other stakeholders in understanding the nature of the business, how it is managed and its solvency position.

### *Our business*

The Company is an independent, specialist financial services company that provides insurance and risk management advice for churches, as well as offering home insurance for Methodist Ministers, church volunteers and church members.

The mission of the Company is to run an ethical and profitable general insurance company for the benefit of the Methodist Church by underwriting its cost of risk and providing risk management advice, thus helping communities create safe environments for worship, witness and service.

Success includes being able to generate distributable profits that may be used to strengthen the Company's capital position and to reinvest in the Methodist community through payment of charitable grants.

### *Business Performance*

The operating performance for 2018 has been below expectation driven by a lower investment return following market volatility, overall delivering an adverse performance compared to the prior year, which had seen both an exceptionally low attritional claim activity and a very strong investment return. Despite this result, the Company has been able to pay a charitable grant of £1.5 million whilst still maintaining its strong capital position.

The underwriting performance for the year was a profit of £1,662k (2017: £2,443k). This has been a result of higher claims experience due to the winter storms that occurred in the first quarter and adverse development on run-off claims, displaying a charge of £31k compared to £341k income seen in 2017.

The investment portfolio generated an overall loss of £531k (2017: £1,924k gain), driven by fair value losses, particularly on the equities given the current market uncertainty. Collectively, after expenses, the total loss on financial investments for the year is 3.8% (2017: 8.7% return). These movements are owing to the FTSE 100 that saw a 12.5% fall during 2018 compared to a 7.6% rise for 2017.

### Solvency and Financial Condition

The Company uses the Standard Formula to calculate its Solvency Capital Requirement (SCR). A summary of the Company's solvency position at the end of 2018 and the change over the year is shown below:

Summary solvency position	2018	2017	Change
	£'000	£'000	£'000
<b>Own Funds</b>	<b>18,213</b>	<b>18,948</b>	<b>(735)</b>
Market risk	4,010	5,085	(1,075)
Counterparty default risk	1,506	1,428	78
Non-life underwriting risk	1,863	1,858	5
Diversification	(1,777)	(1,863)	86
	5,602	6,508	(906)
Operational risk	435	459	(24)
Loss absorbing capacity of deferred tax	(337)	(422)	85
<b>Standard Formula SCR</b>	<b>5,700</b>	<b>6,545</b>	<b>(845)</b>
<b>MCR</b>	<b>3,288</b>	<b>3,251</b>	<b>37</b>
<b>SCR Coverage ratio</b>	<b>320%</b>	<b>290%</b>	<b>30%</b>
<b>MCR Coverage ratio</b>	<b>554%</b>	<b>583%</b>	<b>(29%)</b>

The Company's regulatory solvency position has remained very strong despite Own funds decreasing by £735k in the year mainly as a result of investment market volatility which impacted retained profit for 2018. This is explained in more detail in section E.1.

The Company's SCR decreased in the year by £845k, as market risk fell following the fall in equity values experienced in the latter part of the year.

More detail on the changes in SCR during the year is given in section E.2.

### Outlook for 2019

The UK insurance market continues to be challenging, with strong competition and a continued focus on price. Uncertainty has dominated the political environment throughout the year, with the ongoing Brexit discussions causing market instability. As expected, the financial markets bore the impact of this, seeing a 12.5% decline in the FTSE during 2018.

The Company is exposed to market risk, particularly interest rate and equity risk, and this could lead to capital volatility in the future. Whilst the uncertainty is set to continue in 2019, the current market volatility is expected to stabilise once decisions are reached on the future of Brexit, however a potential economic slowdown is equally possible. Although Brexit is not expected to have a significant impact on the Company's underwriting operations, the overall market instability and potential consequences will continue to be monitored.

Embedding of regulatory change is also anticipated to further shape the financial services sector into 2019. The introduction of the General Data Protection Regulation (GDPR) and Insurance Distribution Directive (IDD) during 2018 has brought about changes to data privacy and enhanced customer rights, which the market will continue to embed during the forthcoming period.

Customer centricity is expected to continue, in the form of both industry regulatory developments as well as market pressures and trends. Technological change also continues to shape the industry, presenting both threats and opportunities. As noted above, price as well as an increased focus on the needs of the customer are expected to be key within the market.

The Company's capital position remains very strong and is well placed to withstand continuing investment volatility, currency instability and industry pressures.

## Directors Statement

Methodist Insurance PLC

Financial year ended 31 December 2018

### Statement required by Article 55 of the Solvency II Directive

We acknowledge our responsibility for preparing the revised Solvency and Financial Condition Report (**SFCR**) in all material respects in accordance with the Prudential Regulation Authority (**PRA**) Rules and the Solvency II Regulations.

We are satisfied that:

- a) Throughout the financial year in question, the insurer has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable to the insurer; and
- b) It is reasonable to believe that the insurer has continued so to comply subsequently, and will continue so to comply in future.



D.S. Walton  
Chairman  
Date: 11 April 2019

## **A. Business and performance**

### **A.1 Business details and group structure**

#### **A.1.1 Name and legal form of the company**

Methodist Insurance PLC is a public limited company incorporated and domiciled in the United Kingdom.

The address of the registered office is:

Beaufort House  
Brunswick Road  
Gloucester  
GL1 1JZ

#### **A.1.2 Supervisory authority**

The supervisory authority for the Company is:

Prudential Regulation Authority  
Bank of England  
20 Moorgate  
London  
EC2R 6DA

#### **A.1.3 External auditor**

The external auditor for the Company is:

KPMG LLP  
1 Sovereign Square  
Sovereign St.  
Leeds  
LS1 4DA

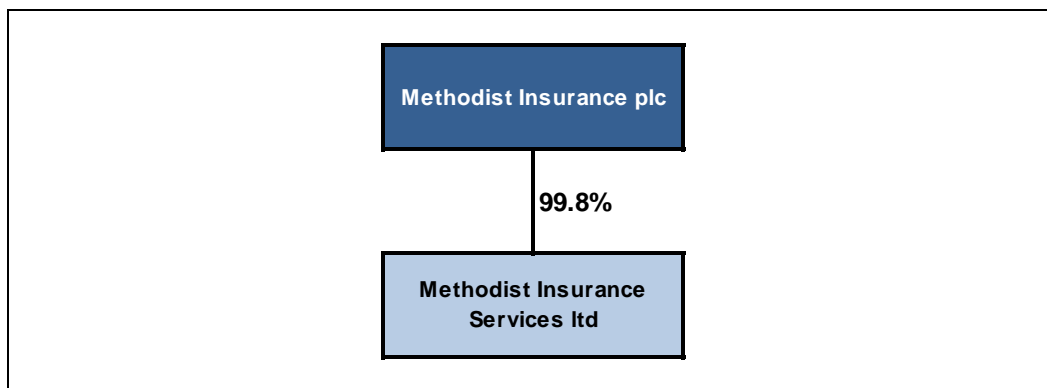
#### **A.1.4 Qualifying holdings**

Qualifying holdings are a direct or indirect holding representing 10% or more of the capital or of the voting rights of the Company, or a holding that makes it possible to exercise a significant influence. The Company has no qualifying holdings.



#### A.1.5 Group structure

Below is a representation of the Methodist Insurance group and the position of the Company within that group:



The subsidiary is incorporated and domiciled in the United Kingdom and is dormant, having not traded since incorporation. The Company holds 998 of the 1,000 ordinary shares of the subsidiary. The remaining shares are held by the directors of the subsidiary, who are also directors of the Company.

#### A.1.6 Lines of business

The company currently operates in the United Kingdom and Republic of Ireland.

The material lines of business are:

- Fire and other damage to property
- General Liability

The Company also writes a small amount of miscellaneous financial loss business and legal expenses insurance.

#### A.1.7 Significant events

As noted in the prior year the result of the European Union (EU) referendum continues to create volatility in investment markets and considerable political and economic uncertainty and this is likely to continue until the format of the exit conditions are known.

## A.2 Performance from underwriting activities

### A.2.1 Overall underwriting performance

The underwriting performance for the year was a profit of £1,662k (2017: £2,443k). This follows a higher claims experience due to the winter storms that occurred in the first quarter and run-off claims displaying a charge of £31k compared to £341k income seen in 2017, primarily driven by the large incurred but not reported (IBNR) reserve movements in 2017.

### A.2.2 Performance by material class of business and by geographical region

Underwriting Performance By Material Class Of Business				
Description	Property		Liability	
	2018 £'000	2017 £'000	2018 £'000	2017 £'000
Gross Written Premium	7,098	7,044	2,183	2,107
Gross Earned Premium	7,038	7,064	2,134	1,991
Gross Incurred Claims	(3,429)	(1,412)	(564)	9
Reinsured	(3,429)	(1,412)	(533)	(332)
Run-off	-	-	(31)	341
Commission	(57)	(59)	(28)	(26)
Expenses	(103)	(135)	(32)	(40)
Gross Underwriting result	<b>3,449</b>	<b>5,457</b>	<b>1,511</b>	<b>1,933</b>
Reinsurance Earned Premium	(7,038)	(7,064)	(2,134)	(1,991)
Reinsurance Claims	3,429	1,412	533	332
Reinsurance Commission	1,029	1,664	743	565
Net Underwriting result	<b>868</b>	<b>1,470</b>	<b>653</b>	<b>840</b>

#### Property

The property account experienced higher claims due to the winter storms that occurred in Q1, as well as increased large and attritional losses during the year. In addition to this, 2017 benefited from a greater favourable development on prior loss years and at 929 new registrations, attritional claims saw a 10% increase compared to prior year.

#### Liability

The liability account has also seen a decline on prior year, driven by the claims performance. Total run-off claims display a charge of £31k (including claims expenses), compared to the £341k income seen in 2017, primarily driven by the large IBNR movements in 2017. 2018 also saw a release of IBNR reserves but to a lesser degree and more in line with the development seen within the case claim movements during the year.

#### Performance by geographical region

The Company has not measured performance by geographical region as the business relating to Ireland (4%) is immaterial.

## A.3 Performance from investment activities

### A.3.1 Investment performance by asset class

Income & Expenses Arising From Investments By Asset Class									
Description	Investment Income			Fair Value Gains/Losses *			Total Return		
	2018	2017	Growth	2018	2017	Growth	2018	2017	Growth
	£'000	£'000	%	£'000	£'000	%	£'000	£'000	%
Fixed Interest Government Stock	86	62	38%	(51)	(48)	(6%)	35	14	149%
Index Linked Government Stock	27	32	(13%)	28	(7)	516%	56	25	122%
Overseas Government Bonds	5	4	16%	0	2	(79%)	5	6	(13%)
Bond Funds	54	67	(19%)	(94)	8	(1,204%)	(39)	76	(152%)
Equity Dividends	364	418	(13%)	(780)	1,208	(165%)	(417)	1,627	(126%)
Other (Inc Bank Interest)	15	9	68%	-	-	-	15	9	68%
Difference On Exchange Gains / (Losses)	5	13	(65%)	-	-	-	5	13	(65%)
Derivatives Realised Gains / (Losses)	-	-	-	(168)	89	(289%)	(168)	89	(289%)
Derivatives Unrealised Gains / (Losses)	-	-	-	(22)	66	(133%)	(22)	66	(133%)
Total Income	556	605	(8%)	(1,086)	1,319	(182%)	(531)	1,924	(128%)

\* Fair value movement includes realised gains and losses on disposals and unrealised gains and losses on the movement in the market value of holdings

Total investment income to December 2018 was £556k, an 8% decrease on the prior year. Despite seeing increases across fixed interest government stocks and overseas government bonds, the overall income has been impacted by index linked government stock, bond funds and equities decreases compared to the prior year.

As part of the investment management strategy the portfolios continue to see a high turnover of holdings. Total fair value losses of £1,086k compared to a £1,319k gain in the prior year, reflecting the impact of the declining financial market. The fair value losses are primarily as a result of the losses from equities compared to a sizeable gain in the prior year. The UK market is experiencing significant losses due to the uncertainty over Brexit.

The Company continues to use currency hedging to reduce its exposure to volatility driven by movements in exchange rates in the value of overseas holdings. Hedging is employed to support its ability to meet current and future liabilities which, except for a small proportion denominated in Euros, are in sterling. The policy is for there to be a partial sterling hedge of 44% of total overseas equities which is reflected in the Investment Manager's performance benchmark for that asset class. The derivatives transacted in the year generated a negative return as a result of the volatility of the markets.

The foreign exchange in the above table relates to business transacted in Ireland and the foreign exchange differences that arise from the accounting treatment of this business, again with volatility leading to reduced returns.

Management fees for the year were £117k, a 0.9% decrease on prior year, following a decrease in the value of the portfolios.

### A.3.2 Gains and losses recognised directly in equity

The Company has not recognised any gains or losses directly in equity in either the current or prior reporting period.

### A.3.3 Investments in securitisation

The business does not hold any investments in securitisation instruments.

## A.4 Performance from other activities

Other Material Income & Expenses			
Description	2018	2017	Var
	£'000	£'000	£'000
Charitable Grants	(1,505)	(4,000)	2,495
Tax	29	19	11
	<u>(1,476)</u>	<u>(3,981)</u>	<u>2,506</u>

### Charitable Grants

Owing to the significant investment loss, the Company provided £1.5m in charitable grants during the year, compared to £4m paid in the prior year.

### Tax

The Company made charitable donations in excess of its taxable profits in both the current and prior year and therefore had a nil taxable profit for both years resulting in a nil current tax charge.

The tax credits in both the current and prior year include a release of deferred tax liabilities following the realisation of gains on financial assets (£29k in 2018 and £19k in 2017).

## A.5 Any other information

The Company was exposed to a defined benefit pension scheme that was wound up, and the scheme's defined benefit obligations fully discharged, in 2015. The scheme's final accounts were prepared to 30 June 2016 and the Company's share (£144k) of the residual surplus net of tax was received during the prior year. There were no such transactions receivable during 2018.

There is no other material information regarding the performance of the Company.

## B. System of governance

### B.1 General information on the system of governance

#### B.1.1 Governing Body – Roles and segregation of responsibilities

The Governing Body of the Company is the Board of Directors (the Board). The Board comprises a Non-Executive Chairman and eight other Non-Executive Directors ('NEDs'). And the Chief Executive Officer (CEO) who is an Executive Director.

The Company believes the size and composition of the Board gives it sufficient independence, balance and wider experience to consider the issues of strategy, performance, resources and standards of conduct.

The composition of the Board is set out in the Company's Articles of Association. The Articles state that the number of Directors cannot exceed twelve, or be less than six in number. In addition, at least two of the Directors should be ordained Ministers or Deacons of the Methodist Church, and not less than two thirds of the Directors should be members of or on the community roll of the Methodist Church. As at 31 December 2018, the Company was compliant with these Article requirements

#### *Key roles and responsibilities*

The Board's role is to provide leadership of the Company within a framework of prudent and effective controls, which enables the risk which the Company faces to be assessed and managed.

The Board is ultimately responsible for the Company's sound and prudent management, ensuring a strong and effective governance framework is implemented and regulatory requirements are met. Great importance is placed on a well-informed and decisive Board, and Board meetings are scheduled and held regularly throughout the year.

A reporting framework outlining the Board's business is reviewed and agreed by the Board annually to ensure that the Board is focused on the right issues at the right time and that sufficient time is allowed for appropriate consideration and debate.

A Board Charter has been developed which clearly establishes a framework for the conduct of the Board and its Committees, with clear guidelines as to its responsibilities, the expected standard of behaviour, and best practice in fulfilling its obligations to the Company. The Board is responsible for:

- culture and values;
- strategy and direction;
- leadership and organisation;
- governance;
- risk management and controls; and
- financial expectations and performance.

The Board Charter is reviewed regularly and is subject to revision from time to time.

A formal Schedule of Matters Reserved for the Board is in place. The schedule includes matters that are solely reserved for the Board's decision and includes:

- strategy and management;
- structure and capital;
- financial reporting and controls;
- internal controls; and
- Board membership and other appointments.

All Directors are expected to take decisions objectively in the interests of the Company, consistent with their legal and statutory duties and commensurate with their knowledge, experience and skills.

### ***Segregation of Responsibilities***

The approach to segregation of responsibilities is set out in the Company's Governance Framework, which sets out the high standards of compliance and corporate governance to be adopted and followed. The framework establishes appropriate procedures, systems and controls to allow directors to discharge their duties and obligations effectively. It sets clear expectations for all operations in terms of their strategy, governance, performance, risk parameters and controls to protect the interests of the Company's stakeholders.

Segregation of responsibilities is an important internal control, which helps ensure that no one individual has unfettered powers of decision. Additionally, it ensures that the Board receives objective and accurate information on financial performance, risk and adequacy of systems.

### ***Chairman***

The Chairman is responsible for:

- the active leadership of the Board, ensuring its effectiveness in all aspects of its role;
- setting the Board's agenda and ensuring that adequate time is available for discussion of all agenda items, in particular strategic issues; and
- ensuring that the Directors receive accurate, timely and clear information to enable them to discharge their responsibilities effectively.

In addition, the Chairman is expected to demonstrate the highest standards of integrity and probity, and set clear expectations concerning the Company's culture, values and behaviours, and the style and tone of Board discussions.

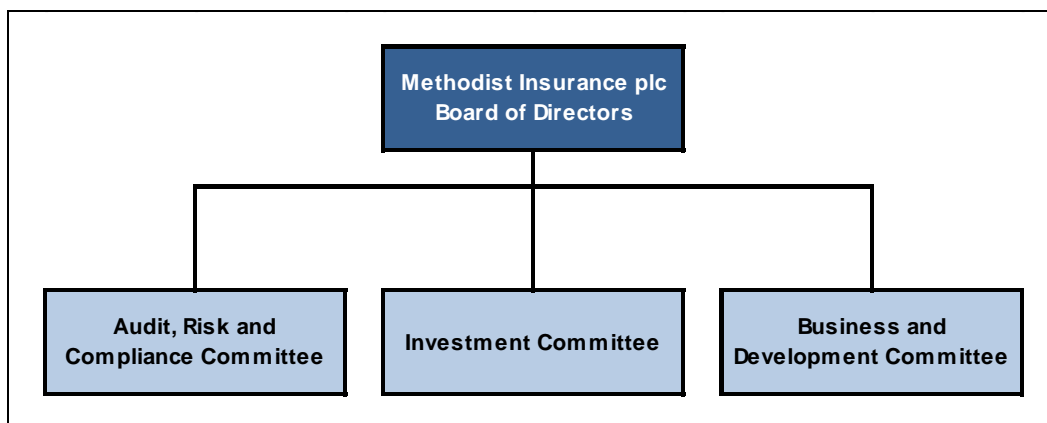
### ***Deputy Chairman***

In addition to their other duties as a NED, the Deputy Chairman is responsible for:

- acting as a sounding board for the Chairman;
- providing support for the Chairman in the delivery of their objectives;
- leading the evaluation of the Chairman;
- acting as an intermediary for the other Directors where necessary; and
- being available to shareholders if they have concerns about the running of the Company that have not been resolved.

### B.1.2 Delegation to committees

The Board has established three committees which support the discharge of its duties. Each committee has agreed terms of reference which sets out requirements for membership, meeting administration, committee responsibilities and reporting.



A high level overview of each committee's delegated responsibilities is set out below:

#### ***Audit, Risk and Compliance Committee (ARC)***

Its responsibilities include:

- overseeing the Company's financial reporting processes;
- reviewing the effectiveness of the outsourced financial, actuarial, risk and compliance functions; and
- managing the relationship with the external auditor.

The committee members have been selected with the aim of providing the relevant financial and commercial expertise necessary to fulfil the committee's duties.

#### ***Investment Committee (IC)***

The Investment Committee meets regularly with the investment managers to ensure that the management of the Company's investment portfolios are properly governed, controlled and performing as expected.

#### ***Business and Development Committee***

Its main purposes are:

- to consider and recommend a business and development marketing strategy that facilitates the achievement of the Company's objectives as set out in its Own Risk and Solvency Assessment Report (ORSA) and three year business plans; and
- to ensure that management are correctly implementing the Company's strategy.

The committee also considers the development of new products, and advertising and distribution channels, and will consider new schemes to enhance the Company's business.

### **B.1.3 Roles and responsibilities of key functions**

#### ***CEO/General Manager***

The General Manager fulfils the Senior Insurance Managers Regime (SMCR) function of Chief Executive, is an employee of the Administrator and their responsibilities include:

- the delivery of, and reporting to the Board on, the implementation and execution of the Company's strategy;
- developing and managing the relationship with key stakeholders including regulators, customers and shareholders;
- establishing a framework and ensuring the maintenance of a sound system of internal control and risk management and reporting regularly to the Board on its effectiveness;
- establishing a clear set of key performance indicators and key risk indicators within which to monitor progress and where necessary take remedial action; and
- maintain effective open communication with senior insurance managers and NEDs.

#### ***Chief Financial Officer (CFO)***

The Chief Financial Officer is an employee of the Administrator and fulfils the SMCR Chief Finance function. Their responsibilities include:

- management of the financial resources of the Company and reporting to the Board in relation to its financial affairs;
- formulating and evaluating the short- and long- term financial objectives and strategy of the Company;
- providing oversight of supply chain management;
- minimising and managing financial risk exposure through implementation of suitable internal controls; and
- ensuring compliance with applicable regulatory, financial and tax obligations.

#### ***Compliance Function***

The Compliance function of the Administrator (Compliance) provides assurance to the ARC and Board that the Company remains compliant with its obligations under the regulatory system and for countering the risk that the Company might be used to further financial crime. It ensures that appropriate mechanisms exist to identify, assess and act upon new and emerging regulatory obligations and compliance risks that may impact on the Company.

#### ***Internal Audit Function***

The Internal Audit function of the Administrator (AIA) derives its authority from the ARC. Internal Audit provides objective assurance to ARC and the Board, that the governance processes, management of risk and systems of internal control are adequate and effective to mitigate the most significant risks to the Company. The Administrator's Director of Internal Audit is accountable to the Chairman of the ARC and regularly reports to the ARC.



### ***Risk Function***

The Risk function of the Administrator derives its authority from the ARC and provides oversight of the prudent management of risk including but not limited to conduct risk. The Chief Risk Officer of the Administrator is accountable to the ARC.

### ***Actuarial Function***

The Actuarial function of the Administrator is accountable for all aspects of capital modelling, pricing and reserving for the Company and the independent actuarial function is responsible for providing opinions on the effectiveness of technical provision calculations, underwriting and pricing and reinsurance purchase. The Actuarial Function reports to the ARC.

#### **B.1.4 Material changes in the system of governance**

There have been no material changes in the system of governance.

#### **B.1.5 Assessment of the adequacy of the system of governance**

The Board is ultimately responsible for the system of governance and believes that the affairs of the Company should be conducted in accordance with best business practice. Accordingly, a Governance Framework has been developed to ensure that the Company operates to high ethical values. The Governance model adopted by the Company ensures oversight of all risk and governance operations. The Governance Framework ensures that the Board is delivering long term value for its shareholder whilst discharging its duties effectively, and maintaining a focus on an appropriate culture aimed at delivering the right outcomes for the Methodist Community and its customers.

The Governance Framework is formally reviewed and approved at regular intervals. Key changes included updating the associated document to reflect the agreement of the revised JAA and Reinsurance Agreement and the introduction of SMCR. However, as a living document it is continually refined to ensure that it appropriately reflects the maturity of the Company's system of governance and risks inherent in the business.

The JAA ensures that all operational and management services are provided by the Administrator. The Reinsurance Agreement ensures that all risks underwritten by the Company are 100% reinsured by the Administrator with the exception of eligible terrorism risks above a minimum retention and flood risks, which are reinsured by Pool Re and Flood Re respectively. The Board continually reviews the adequacy and effectiveness of the outsourced arrangement with the Administrator through regular reporting from the Nominated Non-executive Director's monthly reports, its annual Board evaluation and private strategic discussions. The Chairman of the Board meets annually with the Chief Executive Officer of the Administrator.

The Board, through the ARC, regularly reviews the adequacy of the system of governance on a general basis and has concluded that it is appropriate and effective based on the nature, scale and complexity of the risks inherent in the business. The effectiveness of the system of governance is considered through the receipt of the following:

- the ORSA report;
- internal audit report findings;
- compliance report findings;

- compliance with the schedule of services outlined in the JAA;
- compliance with the governance framework and associated governance documentation; and
- reports from the Administrator's nominated key function holders (KFHs).

In 2017, the Board also requested the Administrator to undertake a formal self-assessment of the services and reporting outlined in the JAA and supporting schedules. The review process included discussions with each of the KFHs responsible for the outsourced areas of the JAA. The review findings highlighted that most of the services were being provided in a comprehensive manner with supporting internal governance and review processes. A formal self-assessment will be undertaken annually.

The Board are content that the management information produced for it, together with the output of both the internal and external audit functions, and the ORSA report evidence the adequacy of the systems of governance used in the management of its business.

#### **B.1.6 Remuneration policy**

The Company has no staff. NED's remuneration is set by the Board every two years, taking into account the responsibilities of the directors and receiving advice on levels of remuneration in comparable organisations.

#### **B.1.7 Entitlement to share options, shares or variable components of remuneration**

The Company has no staff and the Directors have no entitlement to share options, shares or variable components of remuneration in respect of the Company.

#### **B.1.8 Supplementary pension or early retirement schemes for the members of the board and other key function holders**

The Company has no staff and the Directors and other key function holders have no entitlement to supplementary pension or early retirement schemes in respect of the Company.

#### **B.1.9 Material transactions during the reporting period with shareholders, persons who exercise a significant influence, and with members of the board**

No contracts of significance subsisted during or at the end of the financial year in which a director was or is materially interested.

## **B.2 Fit and proper requirements**

#### **B.2.1 Skills, knowledge and expertise requirements**

The recruitment of Directors is normally undertaken by using an external recruitment consultant with a brief written by the Chair or Committee Chair depending on the position to be filled – a skill balance is sought across the Board with skills from Accounting, Actuarial, Insurance, investment and General Business being the key criteria.

Candidates proposed from the selection process are interviewed by two Directors with references taken from employers, past employers and church leaders as the business is largely written within the Methodist market.

Fitness to fulfil the role is assessed through the process and also through post appointment peer review and annual Board effectiveness reviews.

### **B.2.2 Ensuring ongoing fitness and propriety**

In order to determine fitness and propriety of all senior roles, including key function holders within the company, individuals are subject to a competency-based interview following an analysis of their CV.

The competency-based interview is intended to explore the candidates' experience and qualifications and for a key function holder would explore:

- appropriate market knowledge;
- business strategy;
- financial analysis;
- governance and risk management;
- oversight and controls;
- regulatory framework; and
- cultural fit.

Criminal record checks and sanctions checks are carried out for each person in quantifying honesty, integrity and reputation along with a credit check to assist in verifying financial soundness. The Company will also check the Financial Conduct Authority (FCA) register where persons have previously been a key function holder to check that no disciplinary actions have occurred against them. References are also taken from previous employers. The fitness and propriety process for assessing key function holders (KFH's) mirrors the above approach for Senior Insurance Managers Regime (SIMR) and Control Function (CF) Functions. The one exception to the process for KFH's is that regulatory pre-approval is not required, so once the process is complete a notification is forwarded to the regulator for review. Although pre-approval is not required, the regulator may query any points for clarification. Post-appointment, individuals are responsible for their own personal development plan to ensure ongoing competence and are also subject to ongoing performance management. Fit and proper persons are subject to an ongoing fit and proper test annually.

The Company prepared for the implementation of Senior Managers and Certification Regime, which came into effect on 10 December 2018. This means that the approach to Fitness and Propriety was reviewed and refined. With the introduction of the Certified Persons Regime, this has significantly increased the amount of people deemed to be fit and proper, although the process replicates the process formerly used for KFH (i.e. notification).

## **B.3 Risk management system including the ORSA**

### **B.3.1 Overview of the risk management system**

The Company has outsourced the day to day operation of its business to the Administrator under the JAA. Day to day risk management in conjunction with the activities specified under the JAA is carried out within the Administrator's risk management framework but reflecting the Company's Board approved risk

appetite, register and analysis of risk. This comprises the strategies, objectives, policies, guidelines and methodologies needed to ensure that the business is operated on the Company's behalf in line with its expectations, regulatory requirements and commensurate with its own appetite for risk taking. The JAA is the key document which sets out the Board's requirements and expectations of the Administrator.

An effectively operating risk management framework is vital in supporting and promoting the successful and responsible performance of the Company.

### **B.3.2 Effectiveness of identifying and managing risks**

The ARC has delegated responsibility from the Board for reviewing the effectiveness of all aspects of the risk management framework including identification and management of risks and receives regular reports from the respective areas of the Administrator.

The Board receives regular reports from the ARC to ensure that all aspects of the risk management system are robust. Furthermore, as part of their review of the ORSA process and approval of the ORSA document the Board satisfies itself with the effectiveness of the identification and management of the risks faced by the Company in the delivery of its objectives and business strategy.

The Board considers the effectiveness of the overall governance arrangements and in particular the outsourcing agreement together with recommendations for improvement should this be necessary.

### **B.3.3 Implementation of the risk management function**

The JAA formalises the outsourcing arrangement in place with the Administrator who adopt a Three Lines of Defence model to ensure the successful operation of its risk management process. This operates as follows:

- **1st Line (Business management)** is responsible for strategy execution, performance identification and management of risks and the application of appropriate controls;
- **2nd Line (Reporting, oversight and guidance)** is responsible for assisting the CRO and the Company's Board to formulate risk appetite, establish minimum standards, appropriate reporting, oversight and challenge of risk profiles and risk management activities within each of business units. and the
- **3rd Line (Assurance)** provides independent and objective assurance of the effectiveness of the systems of internal control.

The first line of defence consists of the day to day management and operation of the business and requires that those responsible for this are also responsible for ensuring that a risk and control environment is established as part of the day-to-day operations and for delivering strategy and optimising business performance within an agreed risk and governance framework.

Under current arrangements, the majority of first line activity is outsourced to the Administrator. However; the Board is ultimately responsible for the governance and sound and prudent management of the Company. The Board, in fulfilling its functions and objectives, ensures that the Administrator, its outsourcing partner, has a robust risk and governance framework which includes policies, systems and controls.

The second line of defence comprises the risk and compliance functions of the Administrator and the Board's ARC. This provides a framework of governance and risk oversight, and monitors and challenges

the first line of defence. The second line also provides the business with the necessary training, tools and techniques to manage risk and establish internal controls in an effective way.

The third line of defence is independent and objective assurance of the effectiveness of the Company's systems of internal control. This activity principally comprises the Administrator's internal audit function which provides regular reporting to the ARC, but also extends to external audit.

There are a number of key roles and responsibilities with regards to the effective implementation and operation of the overall Risk Management Framework:

#### ***Board of Directors***

The Board are responsible for determining strategy and direction in line with its appetite for risk and satisfying themselves on the integrity of financial information and that financial controls and systems of risk management are robust and defensible. The Board must also ensure that the ORSA process has been followed and managed effectively.

#### ***Audit, Risk and Compliance Committee***

The Board has delegated responsibility for risk management and internal control to the ARC. They are responsible for reviewing the effectiveness of the Company's financial reporting and internal control policies and procedures for the identification, assessment, reporting and management of risks. They also assess the scope and effectiveness of the systems established by management to identify, assess, manage and monitor financial and non-financial risks. The ARC recommends the risk appetite to the Board.

#### ***Investment Committee***

The Board has delegated responsibility for oversight of the Company's investments and associated risk to the Investment Committee (IC). They are responsible for ensuring that the Company operates an investment strategy that is appropriate to the Company's ethics, performance, risk profile and capital management of the business as defined in its statement of investment principles based on its risk appetite and as articulated in the Company's investment policy.

#### ***Chief Executive Officer and the Administrator's operational areas (1st Line of Defence)***

These areas are responsible for ensuring that there is an ongoing process for the identification, assessment, management and reporting of the significant risks during the course of business operations.

#### ***The Administrator's risk function (2nd line of defence)***

The risk function facilitates the management and ongoing effectiveness of the risk management framework by providing tools, training and support so stakeholders can effectively discharge their responsibilities. The risk function facilitates the Board risk identification and assessment process and provides guidance to the Board when determining the risk appetite.

#### ***The Administrator's internal audit function (3rd line of defence)***

AIA provides an independent opinion over the adequacy and effectiveness of the risk management framework. The Internal Audit function is outsourced to the administrator under the terms of the JAA.

A key component of the governance of the Company is a policy framework covering all important elements of managing the Company's business. This contains a set of policies, that provide high level guidance around the following areas:

- Board policies
- Insurance policies
- Capital policies
- Risk and governance policies

each with more detailed policies below.

This policy framework is communicated to those persons within The Administrator who administer the Company's business under the JAA and provides clarity around the risk management expectations of the Board in all aspects of the operations and support adherence to the Company's risk appetite and risk management principles.

#### **B.3.4 Own risk and solvency assessment process**

The objective of an ORSA is to demonstrate that a firm has, or can access, the resources to carry out a business plan in the context of risk policy, risk appetite, a forward looking assessment of risks, the potential for stress and the quality of its risk management environment.

The Board are responsible for conducting the ORSA and are fully involved in the key processes and provide challenge and steer. The Board has delegated the production of the ORSA to the Administrator under the terms of the JAA. This process integrates risk management, business planning and capital management activities. The key steps in the process are as follows:

- Reviewing the risks on the risk register
- Identifying any new and emerging risks
- Quantifying the risks identified
- Calculating the capital requirements
- Undertaking stress and scenario tests
- Comparing to the risk appetite
- Projecting the capital and solvency requirements
- Preparing the ORSA report
- Obtaining an independent review of the process and findings
- Submitting the findings for Board review

The ORSA process is co-ordinated by the Administrator's Risk function with significant input from all relevant subject matter experts undertaking various functions under the terms of the JAA. The Board will only approve the business plan or make strategic decisions after consideration of the impacts on the risk profile and solvency position of the company.

#### **B.3.5 Frequency of review**

The ORSA is an ongoing process that operates on an annual cycle. This results in a report being produced and signed-off by the Board each year. Regular updating of the key elements is undertaken throughout the year and changes to the risk profile and business plans are quantified.

The ORSA process will also be performed upon the occurrence of certain trigger events such a significant external events or material changes to the business strategy.

### **B.3.6 Determination of own solvency needs**

The Board and ARC assess the various risk elements of the business covering credit, operational, underwriting, reserving and investment risk and makes an assessment of the capital requirements arising from those risk elements. Guidance and advice is taken from the CFO, CRO, reserving actuaries, capital finance teams as well as the ARC. Insurance risk is covered by the reserving and underwriting assessments carried out on a regular basis by the operational teams.

The day to day management, compilation of reporting, interaction with risk management systems and stress testing is all carried out by the Administrator under the JAA. Detailed reporting of all aspects of solvency and capital management are reported to the ARC for detailed review prior to recommendation to the Board for approval.

The ARC and Board receive management information monthly and the full management accounting package quarterly. The former provides detail on the underwriting performance and profit commission earned. The latter provides a comprehensive pack including Income Statement, Balance Sheet and Solvency Statement.

It is the overall policy of the Board to ensure that there is always adequate capital to meet current and future projected requirements from the planning process and to satisfy regulatory requirements. An additional buffer is also maintained above the minimum regulatory requirement in accordance with the Board's risk appetite to cover any possible unforeseen events.

## **B.4 Internal control system**

### **B.4.1 Internal control system**

The Internal control system is implemented by the Board and Chief Executive Officer to ensure that the Company is managed efficiently and effectively.

The Board has established appropriate Board level policies and a risk appetite. As the day to day operation of the business has been outsourced to the Administrator, the business is managed within the Administrator's internal control system in accordance with the Board's requirements which are detailed within the JAA. The Board monitors the performance of the Administrator and the internal control system on an ongoing basis.

The control framework for the Board and the elements of the business operated by operational elements of the business managed by the Administrator comprises the following elements:

- Control Environment: A business culture that recognises the importance of systems of control and management ensure the resources and environment is adequate to operate the control framework.
- Control Standards: a policy framework that establishes the Board minimum standards for the mitigation of risk within the stated Appetite;
- Control Activities: business processes that include control activities designed to mitigate risks to the level required to meet the control objectives;

- Monitoring Activities: regular monitoring of controls according to their materiality;
- Training and Communication: effective communication of required control standards and adequate training to ensure those operating or monitoring controls can do so effectively;
- Recording: clear documentation of controls to enable the ongoing operation; and
- Reporting: reporting of material control effectiveness to allow relevant management or the Board to determine whether objectives are being met or whether action is required to strengthen the control environment.

#### **B.4.2 Compliance function**

The Company outsources the provision of compliance services to the Administrator's Compliance function under the terms of the JAA. This function sits in the second line of the three lines of defence governance system and is responsible for:

- identifying, assessing, monitoring and reporting on the Company's compliance risk exposures;
- assessing possible impact of legal and regulatory change and monitoring the appropriateness of compliance procedures; and
- assisting, challenging and advising the Company in fulfilling its responsibilities to manage compliance risks.

In order to ensure adequate risk control for the Company within their outsourcing arrangement Compliance applies the principles and requirements of the Administrator's Compliance Charter. This sets out the roles and responsibilities of Compliance and those policies where it has delegated responsibilities.

The Charter also sets out the Compliance function's objectives and their key performance measures. Compliance gains its authority from the ARC and the Administrator's Compliance Director is accountable to the Chairman of that committee.

### **B.5 Internal audit function**

#### **B.5.1 Implementation of the internal audit function**

The Company outsources the provision of internal audit services to the Administrator's Internal Audit (AIA) function under the terms of the JAA. AIA receives its authority from the Administrator's Group Audit Committee (GAC). As such AIA will report first and foremost to the GAC, with the Company's ARCC subsequently receiving all relevant information.

Where a conflict of interest occurs for AIA, such as providing assurance over the Company's counterparty risk, the controls will be audited up to the point where a conflict occurs. All conflicts will be declared in the scope of each assignment and reported to the ARCC.

AIA maintains a professional audit team with sufficient knowledge, skills, experience and professional qualifications. Where specialist, technical support is necessary to supplement AIA resource, this is available through a co-sourcing contract with an external specialist provider, ensuring that AIA has immediate access to specialist skills where required. AIA agrees with the ARCC the audit plan and confirms that the International Standards for the Professional Practice of Internal Auditing of the Chartered Institute of Internal Auditors are complied with.



AIA operate within the Administrator's three lines of defence model. In order to operate an effective framework AIA maintain regular and ongoing dialogue with the first and second lines to maintain a current and timely perspective of business direction and issues.

#### **B.5.2 Independence of the internal audit function**

The Administrator's Group Chief Internal Auditor has access to the ARCC.

Financial independence, essential to the effectiveness of internal auditing, is provided by the Administrator approving a budget to enable AIA to meet the requirements of its Charter.

AIA is functionally independent from the activities audited and the day-to-day internal control processes of the Company and shall be able to conduct an assignment on its own initiative, with free and unfettered access to people and information, in respect of any relevant department, establishment or function of the organisation.

The Administrator's Group Chief Internal Auditor and staff of AIA are not authorised to perform any operational duties for the Company or the Administrator, or direct the activities of any employee not employed by AIA.

Persons transferred to or temporarily engaged by AIA are not assigned to audit those activities they previously performed for at least one year has elapsed. Furthermore, the demarcation between the third line of defence and the first two lines must be preserved to enable AIA to provide an independent overview to the Board on the effectiveness of all risk management and assurance processes in the organisation.

### **B.6 Actuarial function**

#### **B.6.1 Implementation of actuarial function**

The Company outsources the provision of actuarial services to the Administrator's actuarial function under the terms of the JAA. Methodist's Chief Actuary duties are carried out by the Administrator's Actuarial Function Director, who is an experienced qualified actuary, holding an Institute of Actuaries Chief Actuary certificate, accountable for the delivery of the actuarial function's objectives. The actuarial function resides within the Group Finance area of the Administrator, and as such reports to the Administrator's Chief Financial Officer. The Actuarial Function Director uses other actuarial and appropriately experienced resources to discharge his responsibilities, ensuring an appropriate level of independence between those carrying out activities and those reviewing work.

The Actuarial Function's key areas of responsibility are:

- to provide oversight and co-ordinate the calculation of the technical provisions, ensuring appropriateness of data, assumptions, methodologies and underlying models used;
- to give an opinion on the Technical Provisions to the Board, including assessing the sufficiency and quality of the data used, informing the Board of the reliability and adequacy of the calculation and comparing best estimates to experience;
- to give an opinion on the adequacy of pricing and underwriting to the Board;
- to give an opinion on the adequacy of reinsurance arrangements to the Board as an efficient means to manage risk; and

- to contribute to the effective implementation of the risk management system.

## **B.7 Outsourcing**

### **B.7.1 Outsourcing policy**

The Company has a Procurement, Purchasing and Outsourcing Policy that has been agreed by the Board and forms part of the Policy Framework. The policy covers all procurement activities and material outsourcing arrangements.

The Company's policy is to operate an effective framework for awarding contracts to achieve a quality provision giving consideration to the expected impact on customers. Elements of the policy implementation are outsourced to the Administrator under the terms of the JAA with Ecclesiastical Insurance Office Plc. The Board remain ultimately responsible for the policy ownership and implementation.

Outsourced contracts are subject to stringent controls. The Board is responsible for making all strategic decisions regarding outsourcing in the context of various key objectives and the various parameters contained within the Company's policy on outsourcing, including:

- ensure compliance with all regulatory obligations and good market practice in the selection, management and termination of suppliers;
- optimise the choice, loyalty and performance of suppliers and business partners to deliver cost effective goods and services and service enhancing solutions across the business;
- ensure that suppliers uphold the corporate values and high standards of compliance with the Company's corporate policies and regulatory obligations;
- provide for the mitigation of operational and financial risks related to outsourcing and procurement activities; and
- ensure effective identification, authorisation and management of material outsourced contracts as defined and in accordance with regulatory requirements.

A defined framework and detailed processes are in place for the appointment of new contracting parties that involves:

- the preparation of a detailed specification and risk assessment before inviting tenders;
- a critical assessment of the capacity and ability of shortlisted suppliers that is appropriate and proportionate to the services and risks;
- completion of a business continuity and information security practices questionnaire by all potential providers; and
- an assessment of these against risk appetite.

Comprehensive written contracts are entered into with accountability for managing the delivery against the contract being clearly assigned to an individual manager within the Administrator. Exit and contingency plans are documented and reviewed on a frequent basis to ensure they remain appropriate.

### **B.7.2 Outsourcing of critical or important functions or activities**

There are four contracting parties appointed to deliver critical outsourced services:

- one for the management and administration of insurance activities;
- one for custodian and investment administration services; and
- two for specialist service provisions for specific cover provided in some general insurance products.

All outsourced providers operate from within the United Kingdom. In turn, the Administrator contracts with third parties to deliver services which benefit the Company and all outsourced arrangements entered into by the Administrator are in line with its company policy.

Included within the insurance management and investment outsourcing contracts are provisions for the regular review of the performance of these contracts and is regularly reported to the Board. With these reports and broader oversight and governance arrangements in place the Board are satisfied they are presented with all the information they need to give assurance that the providers are working effectively and within guidelines.

### **B.8 Any other information**

There is no other information to disclose regarding the Company's system of governance.

## C. Risk Profile

### C.1 Underwriting Risk

The most material elements of the Company's underwriting risk are:

- **Reserving Risk** – the risk of adverse change in the value of insurance liabilities relating to outstanding claims from prior accident years, arising from differences in the timing and amount of claims settlements and related expenses from those assumed in the best estimate reserves;
- **Premium Risk** – the risk that premiums relating to future accident years will be insufficient to cover all liabilities arising from that business including net of reinsurance non-catastrophe claims and expenses as a result of fluctuations in frequency and severity of claims, timing of claim settlements or adverse levels of expenses.

#### C.1.1 Underwriting Risk Exposure

The Company's insurance risk arises through the writing of general insurance business. The Company primarily transacts fire, accident and ancillary liability insurance. It delivers products and services to organisations, businesses and individuals directly and, to a limited extent, via intermediaries. The Company specialises in the insurance of properties belonging to the Methodist Church and its associated organisations, but also writes non-church business.

The Company holds significant reserves in respect of long tail liabilities and deterioration in the emerging experience could result in these reserves being inadequate to settle such claims. The ARC assesses the risk through regular reports on the underwriting performance of the business which are provided by the Administrator. This includes details of any developments on pre 1998 business which is not covered through the reinsurance arrangement in place with the Administrator.

There were no material changes to the risk exposures over the reporting period.

#### C.1.2 Underwriting risk concentration

A key concentration for the business is the number of churches underwritten. The Company will be severely impacted if they are lost. This is an accepted risk as a niche insurer specifically set up for the insurance of these churches.

#### C.1.3 Underwriting risk mitigation

The business operating model chosen is to mitigate insurance risks through the agreement with the Administrator to reinsure 100% of the insurance liabilities underwritten since July 1998, except for terrorism and flood risks which are reinsured through Pool Re and Flood Re respectively. The retention applicable on the Pool Re contract is also reinsured by the Administrator. However, this gives rise to reliance on a single reinsurance counterparty for the vast majority of the business written which is discussed under Credit Risk.

In order to provide sufficient protection against significant individual claims relating to the period prior to July 1998 the Board commuted the original reinsurance arrangements in 2010 and purchased aggregate excess of loss reinsurance from the Administrator that will provide appropriate protection for these risks.

The ARC receives quarterly updates on the development of any claims relating to this period to allow the committee to consider whether additional provisions need to be made.

The adequacy of the Incurred but not reported (IBNR) provisions held is reviewed by the Administrator's Actuarial Reserving function quarterly following which a report is provided to the Board which provides information relating to the review of reserve adequacy. There is also an Actuarial Function Opinion report produced annually for the Board which provides an opinion on the reserves.

The ARC and Business and Development Board committees also receive internal audit reports prepared by the Administrator in relation to underwriting matters and require regular updates from the Administrator on the progress of actions to rectify issues.

#### **C.1.4 Underwriting risk sensitivity**

Separate stress tests have been carried out to assess the impact of a potential deterioration in the historic insurance liabilities which is above and beyond the existing claims reserves, and an ongoing substantial rate reduction on existing business written.

The stress test simulating a rate reduction assumes the reduction would be applied annually over the course of the planning period and that the claims and expenses remain at their planned level. The stress test assesses the impact this would have on the Company's profit commission receivable.

The second stress test examines a significant deterioration in the company's insurance liabilities, in the event of an adverse development above and beyond existing claims reserves over the planning period and up to the point at which the aggregate excess of loss reinsurance policy with the Administrator on this claims portfolio takes effect.

The results indicate that the company is well placed to cope with these events in isolation without prompting any significant concerns around solvency or the ability to meet the internal risk appetite.

## C.2 Market risk

Market risk is the risk that the Company is adversely affected by movements in the value of its financial assets arising from a change in interest rates, equity and property prices, credit spreads or foreign exchange rates.

### C.2.1 Market risk exposure

The investment assets of the Company are divided into two portfolios, each with distinct investment policies.

The SCR portfolio policy is to carry minimal downside investment risk and the portfolio is maintained at a level sufficient to meet the operational and capital requirements of the insurance operations of the Company. The portfolio invests predominantly in cash and sterling denominated British Government Securities, with up to 8% by value in Euro denominated European & Economic Monetary Union (EMU) Government Bonds and Euro cash. This portfolio is therefore exposed to the following types of market risk:

- Interest rate risk (Government Bonds)
- Counterparty default risk (Cash balances)
- Currency risk (Euro cash and bonds)

The UC Portfolio covers the Company's surplus capital, and its policy is to adopt a higher exposure to market risk to achieve higher returns. It is invested chiefly in readily realisable securities, quoted on either the London Stock Exchange or a recognised overseas investment exchange. The portfolio may include UK and overseas equities, collective investments including Open Ended Investment Companies (OEICs), unit trusts and investment trusts, UK and overseas bonds and cash. This portfolio is therefore exposed to the following types of market risk:

- Interest rate risk (Corporate Bonds)
- Spread risk (Corporate Bonds)
- Counterparty default risk (Cash balances)
- Currency risk (Overseas cash, bonds and equities)
- Concentration risk (bonds and equities)
- Equity risk (equities)

Both portfolios are measured against benchmarks and monitored by the Investment Committee. The Investment Committee meets regularly with the investment managers and receives quarterly reports from them. These include current valuations, the comparison of asset allocation within the set parameters and measures of investment performance. The minutes of the Investment Committee are presented to the Board with, where appropriate, a verbal update.

The Company does not have off-balance sheet positions nor does it transfer risk to special purpose vehicles.

### C.2.2 Compliance with prudent person principle

The two investment portfolios each have their own policy stipulating the type of investments that can be held and the mix of investment types permitted.

The SCR portfolio reflects a conventional low risk approach through holding cash and Government securities, the primary purpose of these assets is to enable the prudent operation of the business, with a readily realisable value sufficient to meet the current operating needs of the Insurance business and to enable the Company to meet its obligations to its customers and regulators.

While most of the Company's prospective liabilities are denominated in Sterling, a small proportion is denominated in Euros. To match this liability exposure to foreign currency, a similar percentage of the SCR portfolio is also denominated in Euros.

### **C.2.3 Market risk concentration**

The Company has a well-diversified investment portfolio with a healthy mixture of overseas equities, UK equities and Sterling bonds. The largest exposure is to the UK Government, with 25% of total investments being in UK gilts. Other than government stock, the largest single investment is a holding in Sarasin sterling bond fund, representing 7% of total investments.

### **C.2.4 Market risk mitigation**

The SCR portfolio is deliberately risk averse and the appetite is set such that its value is sufficient to ensure the Company exceeds the higher of the SCR and the Minimum Capital Requirement (MCR). Assets may be switched between the two portfolios to ensure that the value of the SCR portfolio exceeds both the SCR and MCR.

The portfolio is benchmarked using indices for cash and securities maturing within 15 years.

The UC portfolio minimises volatility and concentration risk through diversification, both in terms of type of assets and of individual holdings. The Company's UC portfolio investment policy requires a minimum number of equity stocks to be held, and no individual holding can exceed 5% of the total portfolio.

The UK equities of this portfolio are benchmarked against the FTSE All Share (5% capped) index and the overseas element of equity holdings is benchmarked against the MSCI All Countries World (ex UK) index.

As mentioned in C.2.1, The IC meets regularly with the investment managers and receives quarterly reports from them. These include current valuations, the comparison of asset allocation within the set parameters and measures of investment performance. The IC periodically reviews its policies and with the investment manager considers the market outlook. Financial reports covering investments are produced quarterly as part of the management accounts and compared with the reports of the investment manager. These are presented both to the IC and to the main Board. The minutes of the IC are presented to the Board, with, where appropriate, a verbal update.

Most of the Company's underwriting business and prospective liabilities are denominated in Sterling. A small proportion relates to business in the Republic of Ireland and is denominated in Euros, giving rise to a small currency risk. To match this potential Euro denominated liability, up to 8% of the SCR portfolio's value may be held in Euro denominated bonds and cash.

Currency hedging is also employed to manage the Company's exposure to currency risk. It is recognised that the relative value of one currency to another may vary from time to time and long term step changes may develop in one direction or the other. With regard to the UC portfolio, therefore, which is not matching any specific liability, the Investment Manager has been given discretion in his mandate to sterling hedge the overseas equity portfolio.

### C.2.5 Market risk sensitivity

Two stress tests have been carried out to assess the following:

- A sudden fall in equity based investments to simulate a stock market crash.
- A fall in equity based investments in each year over the planning period combined with a deterioration in the claims portfolio over the same period.

The first scenario considers a sudden fall in the equity based investments of 25% in year one with a 10% recovery in the residual holdings the following year. This leads to an operating loss in the first year.

The second stress test assumes a fall of 10% in the equity based investments with additional claims in each year of the planning period. This demonstrates the impact of a surge in claims, impacting the profit commission due from the administrator, at the same time as a fall in investments over a prolonged period.

Although the stress tests impact on the SCR and solvency coverage they do not raise any concerns over the Company's solvency coverage or coverage of the internal risk appetite.

## C.3 Credit risk

### C.3.1 Credit risk exposure

The Company is exposed to premium debtor default risk through the insurance business underwritten and cash at bank default risk. However the most material element arises through reinsurer default. This is due to the high level of reinsurance that the Company utilises on prior reserves and future business written.

The company has reinsured all ongoing business, except for terrorism and flood cover, with the Administrator and therefore retains no net insurance risk on its ongoing portfolio of business. However, this results in a reliance on a single reinsurance counterparty. The Board considers this is an acceptable risk due to the financial benefits provided by the reinsurance arrangements. There have been no material changes to the credit risk exposure over the reporting period.

### C.3.2 Credit risk concentration

The key concentration exists due to the reinsurance arrangement in place with the Administrator. There is also a further adverse development reinsurance arrangement in place with the Administrator which will start to apply should the liabilities that relate to the period prior to the current reinsurance arrangement with the Administrator, which commenced in 1998, exceed £12m.

There are exposures through premium debtors and cash investment holdings although these are deemed to be much less significant and do not present any specific concentrations.

There were no material changes over the reporting period.

### C.3.3 Credit risk mitigation

The Board monitors the financial performance of the Administrator and the Administrator's Group Chief Executive attends a board meeting annually to update on its financial performance and strength.



Regular reporting is provided to the ARC on the pre-1998 liabilities.

There is also a letter of credit in place with the Administrator for £2m in respect of reinsurance amounts recoverable. This provides short term protection in the event of the Administrator failing.

#### **C.3.4 Credit risk sensitivity**

The scenario involving a reduction in credit rating of the main reinsurer has been considered. It was assumed that the credit rating would reduce one notch from its current rating. This would result in the company's SCR for counterparty default increasing and therefore the solvency coverage reducing.

Although this scenario would result in an increase in the SCR this does not present any major concerns over the Company's solvency coverage or coverage of the internal risk appetite.

### **C.4 Liquidity risk**

#### **C.4.1 Liquidity risk exposure**

Liquidity risk is the risk that the company will not have sufficient financial resources to meet their obligations as they fall due, or will only be able to access these resources at an excessive cost.

This is most likely to arise in the event that there is a significant catastrophe event which results in significant claim payments at short notice. This is assessed through the analysis of the cash flows expected to be needed as a result of the projected claims.

There have not been any material changes to this risk exposure over the reporting period.

#### **C.4.2 Liquidity risk concentration**

No material liquidity risk concentrations have been identified, as investments are well diversified with minimal concentration.

#### **C.4.3 Liquidity risk mitigation**

The cash flows are analysed by the Administrator on behalf of the Board to assess the bank balances required to be maintained to pay the claims arising. The Company maintains minimum cash balances which are considered to be adequate to pay claims under normal circumstances.

There is a facility in place to allow for cash calls to be made against the reinsurer. These can be made in the event of large payments to be made on individual large claims or due to an accumulation of smaller claims, usually as a result of weather or other natural catastrophe event.

The ARC considers the analysis of the cash flows on a quarterly basis and is responsible for determining the minimum acceptable level for the company bank accounts.

The company also holds a significant proportion of its investments in readily realisable assets.

There is also a letter of credit in place with the Administrator in respect of reinsurance amounts recoverable. This provides short term protection in the event of the Administrator failing.

#### **C.4.4 Liquidity risk sensitivity**

No stress tests have been carried out for this risk type as the Board does not deem this to be a material issue for the Company.

#### **C.4.5 Expected profit in future premiums**

Expected profit in future premiums are calculated using the expected combined operating measure derived from realistic business plans and applied to the future bound premium, including current premium debtors. The result is apportioned to line of business using the profile of premium written.

The total amount of the expected profit included in future premiums is £172k.

### **C.5 Operational risk**

#### **C.5.1 Operational risk exposure**

The key operational risk that the company is exposed to is through the JAA outsourcing agreement with the Administrator. The Administrator carries out all operational and administrative elements of the business on behalf of the Company within the parameters set out in the JAA. The Company does not have its own staff or systems so is reliant on the Administrator for the services specified in the JAA.

The Board receive a monthly Business Report from the Administrator which provides updates from the key operational areas. In addition, quarterly compliance reports and ad hoc reports on specific items are provided to the ARC where appropriate to enable the Board to assess the level of acceptable risk.

There have not been any changes to the risk exposure over the reporting period.

#### **C.5.2 Operational risk concentration**

The key material concentration arises through the outsourcing agreement for all operational and administrative elements of the business.

#### **C.5.3 Operational risk mitigation**

The Board has a Procurement and Outsourcing Policy as referred to under section B.7 which covers the material outsourcing arrangements.

The JAA is the legal outsourcing contract in place and this details the services provided by the Administrator to the Company. The Board monitors the performance of the Administrator against the services and service standards specified within the JAA on a regular basis. A monthly business report is provided by the Administrator to the Board which details performance against the agreed service standards and the business performance including the financials. In addition to this, the Board is provided with reporting at their quarterly meetings to enable the assessment of the performance of the Administrator.

The JAA contains a termination period of 12 months and a defined exit plan in the event that the Company decides the arrangement is no longer acceptable or the Administrator gives notice on the agreement.

#### **C.5.4 Operational risk sensitivity**

Although scenario testing has not been carried out on this element, the Board has considered this risk and the existing controls as part of the ongoing risk management process.

### **C.6 Other material risks**

#### **C.6.1 Other material risk exposure**

Reputational risk is the potential for events to occur which could result in negative impacts upon the Company. Reputational risk generally arises from the other specific risks, for example, a lack of liquidity leading to a delay in the payment of a large claim could result in reputational damage in the eyes of stakeholders.

The Board is responsible for the oversight of this risk and assess the potential reputational impacts to the business as part of the ongoing strategic discussions. The assessment of a number of the other risk types considers the potential for reputational impacts as a key component in determining the materiality.

There have been no material changes to the risk exposure over the reporting period.

The decision of the UK to exit the EU has implications for the Company. The Company currently utilises EU passporting to underwrite a small amount of Irish business. The Board is putting in place appropriate arrangements for this business.

#### **C.6.2 Other material risk concentration**

There are no material risk concentrations to note.

#### **C.6.3 Other material risk mitigation**

Capital is not held against reputational risk. The risk of negative reputational impacts is mitigated to a certain extent through the effective management of the other key risk types and also the speed and quality of response if negative reputational impacts occur. The Board monitors the ongoing effectiveness of the risk mitigation at their regular meetings and as part of the monitoring of the other risk types.

#### **C.6.4 Other material risk sensitivity**

No stress tests have been carried out on the risk type and instead consideration is given to it as part of the assessment of the other risk types.

### **C.7 Any other information**

This has been assessed by the Board who believe that there is no further material information to note.

## D. Valuation for solvency purposes

All material asset and liability classes other than technical provisions have been valued in accordance with Article 75 of Directive 2009/138/EC (the Directive) and Articles 7 to 16 of the Delegated Regulation (EU) 2015/35 (the Delegated Act), taking into account the European Insurance and Occupational Pensions Authority (EIOPA) publication 'EIOPA-BoS-15/113 – *Guidelines on recognition and valuation of assets and liabilities other than technical provisions*'.

Technical provisions have been valued in accordance with Articles 76 to 86 of the Directive.

As permitted by Article 9 of the Delegated Act, the valuation of assets and liabilities are based, where appropriate, on the valuation method used in the preparation of the annual financial statements. The financial statements have been prepared in accordance with international financial reporting standards (IFRS) and audited by external auditors.

Material assets and Liabilities are defined as assets and liabilities that are valued in excess of £169k (Equivalent to 1% of IFRS net assets).

International Accounting Standard (IAS) 39, Financial Instruments: Measurement and Recognition, requires the classification of certain financial assets and liabilities into separate categories for which the accounting requirement is different.

The classification depends on the nature and purpose of the financial assets and liabilities, and is determined at the time of initial recognition. Financial instruments are initially measured at fair value. Their subsequent measurement depends on their classification.

Financial instruments designated at fair value through profit or loss are subsequently carried at fair value. This category consists of financial investments.

All other financial assets and liabilities are held at amortised cost using the effective interest method, except for short-term receivables and payables where the recognition of interest would be immaterial.

The Directors consider that the carrying value of those financial assets and liabilities not carried at fair value approximates to their fair value.

## D.1 Assets

### D.1.1 Solvency II valuation of assets

A copy of the Quantitative Reporting Template (QRT) 'S.02.01.02 – Balance sheet' is included in Appendix 1. The table below summarises the SII valuation, compared with the financial statements prepared in accordance with IFRS and a breakdown of the valuation of assets:

Solvency II valuation	2018 As reported IFRS Basis	Reclassify to aid comparison	2018 Reclassified IFRS valuation	Net valuation movement	2018 Solvency II Valuation
	£'000	£'000	£'000	£'000	£'000
Total Assets	40,555	(1,864)	38,691	(4,014)	34,677
Total liabilities	23,656	(1,864)	21,792	(5,328)	16,464
<b>Net assets</b>	<b>16,899</b>	<b>-</b>	<b>16,899</b>	<b>1,314</b>	<b>18,213</b>
<b>Breakdown of assets</b>					
Technical provisions - Reinsurance recoverables	14,654	(745)	13,909	(4,010)	9,899
Investments	19,446	41	19,487	-	19,487
Cash and cash equivalents	5,235	-	5,235	-	5,235
Insurance & intermediaries receivables	1,119	(1,119)	-	-	-
Receivables (trade, not insurance)	101	(41)	60	(4)	56
<b>Total assets</b>	<b>40,555</b>	<b>(1,864)</b>	<b>38,691</b>	<b>(4,014)</b>	<b>34,677</b>

The table includes reclassification of certain IFRS assets and liabilities to aid comparability. This has been done as items such as reinsurance payables, which are included within other liabilities in the annual financial statements, are included within the valuation of reinsurance recoverables for SII provided they are not past their due date. Moving this balance from liabilities to assets removes the need to disclose the same difference in both assets and liabilities.

#### Technical provisions - Reinsurance recoverables

The valuation of reinsurers' share of technical provisions and the differences in valuation methodology compared with the financial statements are covered in section D.2.

#### Investments - Participations

The subsidiary undertaking is dormant, having not traded since incorporation and has been valued at cost. The Directors consider that cost approximates to its fair value.

#### Investments other than participations

The fair value measurement basis used to value financial assets or liabilities held at fair value, which includes investments, is categorised into a fair value hierarchy as follows:

**Level 1:** fair values measured using quoted prices (unadjusted) in active markets for identical assets or liabilities. This category includes listed equities in active markets, listed debt securities in active markets and exchange traded derivatives.

**Level 2:** fair values measured using inputs other than quoted prices included within level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices). This category includes listed debt or equity securities in a market that is not active and derivatives that are not exchange traded.

**Level 3:** fair values measured using inputs for the asset or liability that are not based on observable market data (unobservable inputs). This category includes unlisted equities, including investments in venture capital, and suspended securities.

All financial investments held by the company and designated at fair value are classified as level 1 except for derivative financial instruments which are classified as level 2.

The fair value of investments in the SII valuation is dirty priced (includes accrued interest) whereas the financial statements includes accrued interest within trade receivables.

### ***Insurance & intermediaries receivables***

Due to the short term nature of the outstanding balances, their amortised cost is assumed to approximate to their fair value. For SII this only comprises debtor balances that are past due. Debtor balances that are not past due are future cash flows that form part of technical provisions as covered in section D.2.

### ***Receivables (Trade, not insurance)***

This comprises trade debtor balances. Due to the short term nature of the outstanding balances, their amortised cost is assumed to approximate to their fair value.

The valuation of non-insurance receivables for SII excludes prepayments which have no fair value.

### ***Cash and cash equivalents***

This comprises on demand deposits with banks. Cash balances are not subject to a significant risk of change in value and are considered to be held at fair value.

## **D.2 Technical provisions**

### **D.2.1 Solvency II valuation of technical provisions and assumptions used**

Under SII the technical provisions are made up of:

- discounted best estimate claims provisions;
- discounted best estimate premium provisions; and
- risk margin.

The non-life technical provisions (TPs) are calculated as a sum of best estimate and risk margin using a three-stage process of grouping data for homogeneous risks, selecting methodologies and setting assumptions which take into account the economic, underwriting and reserving cycles.

The reserving process captures material factors via engagement and interaction across relevant business areas, particularly the claims and underwriting functions. These factors may not be inherent in the historical data, for example a change introduced to the claims management philosophy may impact the incurred development pattern going forward.

The level of governance applied in setting the TPs is varied depending on the reporting date. The full governance framework is applied as an on-going cycle of activity, particularly driven by external financial

reporting dates. Multiple review steps are in place, plus an external audit. This framework is used to sign-off the key reserving assumptions for both the IFRS statutory accounts, and the SII TPs.

The reserving framework is structured such that sufficient oversight exists within the reserve setting process through reviews by key stakeholders within management, by the Actuarial Function Director, and ultimately by the Board via Committee. This ensures there is an independent challenge to the process and results, and that future developments within the business are incorporated into the projections where appropriate.

### *Modelling methodologies and assumptions*

The nature of input assumptions for the reserving models used in projecting ultimate claims costs varies based on the class of business modelled, the levels of historical data available and the nature and complexity of the underlying risk. The final choice of model and assumptions involves professional actuarial judgement and a technical review within the reserving Governance Framework.

The following methods are used accordingly:

- Incurred Development Factor Method (DFM) used either in isolation for 'fire and other property damage' classes or in combination with other methods for liability and latent classes;
- Bornhuetter-Ferguson Method (BF) used primarily for more recent development years for the liability classes;
- frequency-severity approach for liability classes; and
- simplified methods like scaling based on exposure measures and Events Not in Data (ENID).

Once the best estimates are calculated, all future years' cash flows are discounted to present value using the prescribed EIOPA risk-free discount curve for the relevant currency interest rate-term structure. No transitional arrangements or adjustments are applied for the non-life TPs relating to matching or volatility adjustment.

### *Valuation*

Claims provisions, premium provisions and risk margin by class are reported on 'QRT S.17.01.02 – Non-life technical provisions' which is included in Appendix 5. The two major contributors to the TPs are the 'general liability' and 'fire and other property damage' classes of business.

### *Risk margin*

The SCR used for calculating the risk margin is a subset of the full standard formula calculated on a 1-year view of risk, reflecting only those risks on already obligated future business as at the balance sheet date.

#### **D.2.2 Level of uncertainty**

The estimation of the ultimate liability arising from claims made under non-life insurance contracts is subject to uncertainty as to the total number of claims made on each class of business, the amounts that such claims will be settled for and the timings of any payments. Examples of uncertainty include:

- whether a claims event has occurred or not and how much it will ultimately settle for;
- variability in the speed with which claims are notified and in the time taken to settle them, especially complex cases resolved through the courts;

- changes in the business portfolio affecting factors such as the number of claims and their typical settlement costs, which may differ significantly from past patterns;
- new types of claim, including latent claims, which arise from time to time;
- changes in legislation and court attitudes to compensation, which may apply retrospectively;
- the potential for periodic payment awards, and uncertainty over the discount rate to be applied when assessing lump sum awards;
- the way in which certain reinsurance contracts (principally liability) will be interpreted in relation to unusual/latent claims where aggregation of claimants and exposure over time are issues; and
- whether all such reinsurances will remain in force over the long term.

While the best estimate TPs calculation targets reserving for the average or expected future cost within a range of possible outcomes, due to the uncertainties it is likely that the actual costs will differ from the reserved amount.

### *Sensitivity analysis*

In order to better understand the underlying uncertainty, a range of possible outcomes are tested and analysed. Sensitivity Analysis is a technique used to understand the variability of possible outcomes. This is done by analysing the change in TPs as a result of adjusting a single input parameter.

The table below shows the results of several sensitivity tests, which have been selected to provide coverage of a broad range of risks, which it is foreseeable could materialise within the next 12 months. This is for illustrative purposes and does not represent an exhaustive list of possible events:

Risk	Sensitivity applied	£'000
Claims inflation	+ 1.0% each year applied cumulatively	434
Discount rate shift	+ 0.5% to spot rate at all durations	(427)
Reinsurance default	All reinsurer ratings downgraded to B	76

The largest sensitivity considered is the inflationary shock, due to the materiality of net latent claims exposure, the cumulative impact over the full duration of the liabilities and judgemental nature of the assumption when considering the very long term.

The choice of yield curve shock is based on the assumption that if there are upward or downward rate cycles, the Bank of England will change the interest rates by 25 basis points (bps) at a time, with an assumption of two base rate changes per year translating to an equivalent up or down shift at all durations.

The inflation and discount rate sensitivities are individually broadly symmetric in that an equivalent decrease in the respective inputs will decrease/increase the TPs by a similar order as the above.

Reinsurance default also represents a significant shock due to the critical part that reinsurance strategy plays in the business model of the Company. Counterparty default risk is an important component of the Company SCR therefore the risk margin is also sensitive to this item.



#### D.2.3 Comparison of solvency II technical provisions with valuation in annual financial statements

The building blocks making up the TPs can be split between those for which the valuation methodology is compatible between SII and current IFRS, and those which, by requirements of the SII technical specifications, will necessarily be different.

The claims provision calculation (liability on earned business) may follow similar bases, methods and assumptions as IFRS, with the exception that the accounts are currently undiscounted whereas a SII discount rate is prescribed by EIOPA and applied to the total reserves.

Other adjustments relate to different definition of contract boundaries, the allowance for future earned profits and the consideration of future premium cash inflows in the premium provision for SII:

<b>Net technical provisions</b>	<b>2018</b>
	<b>£'000</b>
<b>IFRS Technical Provisions net of deferred acquisition costs, debtors and creditors</b>	7,329
Adjustment for risk margin	(726)
Adjustment for discounting	(639)
Adjustment for premium provision	(221)
<b>SII Net technical provisions</b>	<b>5,743</b>

#### D.2.4 Use of the matching adjustment, volatility adjustment, the transitional risk-free interest rate-term structure and use of the Article 308[d] transitional deduction

The matching adjustment, volatility adjustment, use of the transitional risk-free interest rate-term structure and use of the transitional deduction is not applied to the non-life insurance TPs.

#### D.2.5 Recoverables from reinsurance contracts and special purpose vehicles

The recoverables are calculated separately by class of business taking into account the arrangements that are in place for each year of loss. Other than for losses prior to 1998, the reinsurance arrangement is for 100% of the business. The operational management of the portfolio and any retrocession arrangement decisions affecting the profit share are delegated to the Administrator as part of this arrangement.

#### D.2.6 Material changes in the assumptions made in the calculation of technical provisions compared to the previous reporting period

There have been no significant changes to previously used assumptions for the premium provision, which remain aligned to business plans.

## D.3 Other liabilities

### D.3.1 Solvency II valuation of other liabilities

A copy of the QRT 'S.02.01.02 – Balance sheet' is included in appendix 1. The table below summarises the SII valuation, compared with the financial statements prepared in accordance with IFRS and includes a breakdown of the valuation of liabilities:

Solvency II valuation		2018	Reclassify to aid comparison	2018	Net valuation movement	2018
		As reported IFRS Basis		Reclassified IFRS valuation		Solvency II Valuation
		£'000	£'000	£'000	£'000	£'000
Total Assets		40,555	(1,864)	38,691	(4,014)	34,677
Total liabilities		23,656	(1,864)	21,792	(5,328)	16,464
<b>Net assets</b>		<b>16,899</b>	<b>-</b>	<b>16,899</b>	<b>1,314</b>	<b>18,213</b>
Breakdown of liabilities						
Technical provisions - non-life		22,357	(1,119)	21,238	(5,596)	15,642
Reinsurance Payables		745	(745)	-	-	-
Deferred tax liabilities		68	-	68	269	337
Payables (trade, not insurance)		480	-	480	(1)	479
Other liabilities		6	-	6	-	6
<b>Total liabilities</b>		<b>23,656</b>	<b>(1,864)</b>	<b>21,792</b>	<b>(5,328)</b>	<b>16,464</b>

The table includes reclassification of certain IFRS assets and liabilities to aid comparability, as explained in section D.1

#### Technical provisions – non-life

The valuation of technical provisions and the differences in valuation methodology compared with the financial statements are covered in section D.2.

#### Reinsurance Payables

For SII this only comprises creditor balances that are past due. Balances that are not past due are future cash flows that form part of reinsurers' share of technical provisions as covered in section D.2

#### Deferred tax liabilities

The calculation of deferred tax for use in the financial statements is based on temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for tax purposes.

Deferred tax is measured using tax rates expected to apply when the related deferred tax asset is realised or the deferred tax liability is settled based on tax rates and laws which have been enacted or substantively enacted at the year-end date.

For SII the deferred tax liability has been recalculated to take into account the valuation differences between the financial statements and the SII valuation of assets and liabilities. As this timing difference is not expected to reverse in the foreseeable future, the tax rate used is 17%, being the rate of corporation tax that becomes effective from April 2020.

***Payables (trade, not insurance)***

Trade payables consists of tax payable, amounts due to suppliers and accrued costs. The balances are all due within one year and due to their short term nature their carrying value of amortised cost is deemed an appropriate approximation of fair value.

Included within 'Payables (trade, not insurance)' are unpresented cheques and unclaimed capital and dividends which are removed in the SII valuation as they have no fair value.

***Any other Liabilities***

An intercompany balance with the Company's dormant subsidiary is included in other liabilities. In light of its immateriality, the amortised cost is assumed to approximate to fair value.

**D.4 Alternative methods for valuation**

No alternative valuation methods have been used in the valuation of SII Assets or liabilities.

**D.5 Any other information**

There is no other information that requires disclosure regarding the valuation of assets and liabilities.

## E. Capital Management

### E.1 Own funds

Under SII, capital that the Company can use to meet its regulatory SCR and MCR is called Own Funds. Off balance sheet items that can be called upon to absorb losses are called Ancillary Own Funds. The Company does not hold any such items.

The excess of assets (section D.1.1) over liabilities (section D.3.1) plus qualifying subordinated debt less any foreseeable distributions constitutes basic own funds:

Basic Own Funds	2018 £'000	2017 £'000
SII Valuation of assets	34,677	36,285
SII Valuation of liabilities	(16,464)	(17,337)
Excess of assets over liabilities	18,213	18,948
Subordinated debt	-	-
Foreseeable distributions	-	-
<b>Basic own funds</b>	<b>18,213</b>	<b>18,948</b>

Foreseeable distributions are future expense items such as dividends that have been approved for payment by the Board. The Company has no subordinated debt and no foreseeable distributions.

#### E.1.1 Own funds - objectives, policies and processes

The overall responsibility for reviewing and approving the Capital Management Policy lies with The Board.

The responsibility for the Policy implementation resides with the Board through the Investment Committee who are involved in managing capital and solvency. It is the Company's policy to provide a robust framework for the management and control of capital that underpins business performance and supports strategic development. The Board, supported through the JAA on a day to day operational level will:

#### *Regulatory and legislative*

- Ensure current and future rules are monitored and understood, particularly regarding the definition of capital and various capital requirements;
- Ensure capital is maintained at a sufficient quality in order to meet current and future projected requirements over the business plan period;
- Ensure the Company has a defined risk appetite regarding the quality and tiering of capital required to meet its own internal appetite for solvency;
- Ensure there is sufficient capital held in order to satisfy capital requirements, regulatory or otherwise;
- Ensure that the level of capital available in the Company, regulatory or otherwise, is monitored on a regular basis in accordance with an agreed process; and
- Ensure there is regular monitoring and review of the quality and tiering of capital, in order to assess whether the above targets are met on an ongoing basis.

### ***Definition and monitoring of our solvency capital requirements***

- Ensure all current and future capital requirements, regulatory or otherwise, are understood at all times;
- Ensure the Company has an agreed definition of an 'Economic Capital Requirement', reflecting its own view of risk;
- Ensure the Company has an agreed risk appetite to ensure a satisfactory level of capital coverage on all relevant bases, including a statement of coverage for its economic and regulatory capital;
- Ensure the Company has at least enough capital to meet its regulatory requirements at all times;
- Ensure that all capital requirements covered by the risk appetite are calculated and the relevant solvency position reviewed on a regular basis in accordance with an agreed process;
- Ensure that relevant stakeholders (i.e. regulators) are informed of any adverse changes to solvency positions in excess of agreed reporting levels; and
- Ensure that future capital requirements and projected solvency positions throughout the period of the business plan are assessed in the ORSA process.

### ***Principles around the distribution and raising of capital***

- Ensure there is a clearly defined process for assessing level of dividends and grants prior to any payment being made;
- Ensure there is a clearly defined process for monitoring market conditions and future capital needs in order to assess the requirement and benefit of capital raising or redemptions; and
- Ensure the appropriateness for raising or redeeming capital is assessed against all other principles outlined in this Policy (e.g. solvency coverage, capital quality).

### ***Principles around the allocation and use of capital***

- Ensure the Company has an agreed return on capital target which is aligned to the expectations of all key stakeholders (i.e. Board);
- Ensure there is an agreed approach to setting and monitoring the return on capital;
- Ensure that there is a clear process for determining when a strategic decision should take into account a capital perspective; this must cover all decisions that materially change the use of capital or solvency position; and
- Ensure that each such decision-making considers the impact on solvency, capital allocation, return on capital and any other principles included in this Policy.

The Board will continue to monitor and maintain the integrity of the capital management policy, standards and guidance to ensure they reflect the culture of the business and the regulatory environment in which it operates.

Reports detailing performance against this policy or any business critical changes will be reviewed periodically, but at least annually, by the ARC.

Any breaches of the policy are escalated immediately to the Board Chairman and Chairman of the ARC. The policy is reviewed on a three year cycle, taking into account any new or changes to legislation, or more frequently should a significant change in the business, market or regulatory environment occur.

Capital and revenue planning is undertaken annually, encompassing a three year horizon.

### E.1.2 Movement in own funds compared to prior period

A copy of the QRT 'S.23.01.01 – Own Funds' is included in Appendix 6. The table below is a summary of own funds, by tier, with comparison to the prior year:

Own Funds by Tier	Total £'000	Tier 1		Tier 2 £'000	Tier 3 £'000
		Unrestricted £'000	Restricted £'000		
<b>2018</b>					
Ordinary share capital	113	113	-	-	-
Reconciliation reserve	18,100	18,100	-	-	-
	<u>18,213</u>	<u>18,213</u>	<u>-</u>	<u>-</u>	<u>-</u>
<b>2017</b>					
Ordinary share capital	113	113	-	-	-
Reconciliation reserve	18,835	18,835	-	-	-
	<u>18,948</u>	<u>18,948</u>	<u>-</u>	<u>-</u>	<u>-</u>
<b>Movement in own funds</b>					
Ordinary share capital	-	-	-	-	-
Reconciliation reserve	(735)	(735)	-	-	-
	<u>(735)</u>	<u>(735)</u>	<u>-</u>	<u>-</u>	<u>-</u>

The reconciliation reserve is primarily retained earnings from the financial statements adjusted for differences in valuation between the financial statements and SII, as covered in section D. An analysis of the reconciliation reserve is included in Appendix 6.

No ancillary own funds have been recognised.

The table below summarises the key movements in the reconciliation reserve between the current and prior year:

Movement in reconciliation reserve	£'000
<b>Prior year balance</b>	<b>18,835</b>
IFRS Retained earnings for year	(461)
Movement in SII valuations:	
Gross technical provisions	1,028
Reinsurance recoverables	(1,357)
Other	(1)
Movement in revaluation of deferred tax	56
<b>Total movement for year</b>	<b>(735)</b>
<b>Current year balance</b>	<b>18,100</b>

Two key components of the IFRS retained earnings for the year are underwriting performance, covered in section A.2, and investment performance, covered in section A.3. Other items, such as tax and grant payments, are covered in section A.4.

### E.1.3 Eligible amount of own funds available to cover the Solvency Capital Requirement

As all of the own funds are classified as unrestricted tier 1 capital, all are eligible to cover the SCR.

#### E.1.4 Eligible amount of own funds available to cover the Minimum Capital Requirement

As all of the own funds are classified as unrestricted tier 1 capital, all are eligible to cover the MCR.

#### E.1.5 Comparison between solvency II own funds and equity reported in the financial statements

Reconciliation from IFRS net assets to Solvency II own funds		2018	2017
		£'000	£'000
<b>Equity as reported in IFRS Financial Statements</b>		<b>16,899</b>	<b>17,360</b>
Revalue technical provisions:	Gross technical provisions	5,596	4,568
	Reinsurance recoverables	(4,010)	(2,653)
Remove prepayments and other assets with no fair value		(4)	(3)
Remove other liabilities with no fair value		1	1
Impact on deferred tax of revaluation		(269)	(325)
<b>Solvency II Valuation of own funds</b>		<b>18,213</b>	<b>18,948</b>

Technical provisions are revalued on a SII basis as described in section D.2.

Some assets and liabilities such as prepayments are removed from the SII valuation as they are inadmissible or deemed to have no measurable fair value. This is covered in sections D.1 (assets) and D.3 (liabilities).

The difference between the SII value of net assets and the value used for the calculation of tax gives rise to an adjustment to the deferred tax provision. This is explained in section D.3.

#### E.1.6 Transitional arrangements

There are no own fund items that are subject to transitional arrangements.

#### E.1.7 Ancillary own funds

Approval has not been sought for any form of ancillary own funds.

#### E.1.8 Items deducted from own funds and restrictions affecting the availability and transferability of own funds

No items have been deducted from basic own funds, and there is no significant restriction affecting the availability and transferability of own funds.

## E.2 Solvency Capital Requirement [SCR] & Minimum Capital Requirement [MCR]

### E.2.1 SCR and MCR

The SCR is the amount of capital that the Company must hold to satisfy the requirements of the SII Directive. The Company uses the Standard Formula SCR calculation which is defined in the SII Delegated Act. This is formula based and consists of modules for each risk type, and adjustments for diversification and the loss absorbing capacity of deferred tax. A breakdown of the SCR elements applicable to the Company is given in the following section.

The MCR is the higher of the absolute floor (£3,228k) and the combined MCR.

The combined MCR is based on the linear MCR, subject to a cap (45% of the SCR) and floor (25% of the SCR). The Linear MCR is a simplistic calculation based on factors applied to net written premiums and net best estimate of TPs, analysed by class of business.

A copy of the QRT 'S.25.01 – Solvency Capital Requirement' and 'S.28.01 – Minimum Capital Requirement' are reproduced in appendices 7 and 8 respectively.

As at 31 December 2018 the SCR for the Company was £5,700k, and the MCR was £3,288k. Both amounts are still subject to supervisory assessment.

### E.2.2 SCR by risk module

Movement in Capital Requirements	2018	2017	Change
	£'000	£'000	£'000
Market risk	4,010	5,085	(1,075)
Counterparty default risk	1,506	1,428	78
Non-life underwriting risk	1,863	1,858	5
Diversification	(1,777)	(1,863)	86
<b>Basic SCR</b>	<b>5,602</b>	<b>6,508</b>	<b>(906)</b>
Operational risk	435	459	(24)
Loss absorbing capacity of deferred tax	(337)	(422)	85
<b>SCR</b>	<b>5,700</b>	<b>6,545</b>	<b>(845)</b>
<b>MCR</b>	<b>3,288</b>	<b>3,251</b>	<b>37</b>

### E.2.3 Changes to the SCR and MCR compared to the prior period

The table above summarises the movement in the SCR and MCR between the current and prior year.

Market risk has reduced as a consequence of falls in equity values, as reported in section A.2. The remaining components of the SCR have remained comparable to the prior year, with diversification decreasing slightly as a consequence of the reduction in market risk.



The MCR is equivalent to the absolute floor for both the current and prior year. As the absolute floor is quoted in Euros and not the reporting currency of sterling, changes in exchange rate, and not movement in the absolute floor, is the driver of the change compared to the prior year.

**E.2.4 Use of simplified calculations, undertaking specific parameters and the option provided for in the third subparagraph of Article 51(2) of Directive 2009/138/EC**

No simplifications and no undertaking specific parameters have been used in calculating the standard formula SCR. As no capital add-on has been applied, and no undertaking specific parameters have been utilised, no illustration of their impact is necessary and use of the option provided for in the third subparagraph of Article 51(2) of the Directive has not been made.

**E.2.5 Inputs used in the calculation of the MCR**

A copy of the QRT 'S.28.01.01 - Minimum Capital Requirement' showing the inputs used for the calculation of the MCR is included in Appendix 8.

**E.3 Use of the duration-based equity risk sub-module in the calculation of the SCR**

The duration-based equity risk sub-module has not been used.

**E.4 Differences between the standard formula and the internal model**

An internal model has not been used in the calculation of the Company's SCR.

**E.5 Non-compliance with the MCR and non-compliance with the SCR**

**E.5.1 MCR non-compliance**

There has been no breach of the MCR during the reporting period.

**E.5.2 SCR non-compliance**

There has been no breach of the SCR during the reporting period.

**E.6 Any other information**

No further information regarding the capital management of the company is required.

## Appendix 1 – QRT S.02.01.02 Balance Sheet

### S.02.01.02

#### Balance sheet

		Solvency II value
		C0010
<b>Assets</b>		
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	19,487
R0080	<i>Property (other than for own use)</i>	0
R0090	<i>Holdings in related undertakings, including participations</i>	1
R0100	<i>Equities</i>	10,398
R0110	<i>Equities - listed</i>	10,398
R0120	<i>Equities - unlisted</i>	0
R0130	<i>Bonds</i>	7,199
R0140	<i>Government Bonds</i>	7,056
R0150	<i>Corporate Bonds</i>	143
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	0
R0180	<i>Collective Investments Undertakings</i>	1,888
R0190	<i>Derivatives</i>	1
R0200	<i>Deposits other than cash equivalents</i>	0
R0210	<i>Other investments</i>	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	0
R0240	<i>Loans on policies</i>	0
R0250	<i>Loans and mortgages to individuals</i>	
R0260	<i>Other loans and mortgages</i>	
R0270	Reinsurance recoverables from:	9,899
R0280	<i>Non-life and health similar to non-life</i>	9,899
R0290	<i>Non-life excluding health</i>	9,899
R0300	<i>Health similar to non-life</i>	0
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	0
R0320	<i>Health similar to life</i>	
R0330	<i>Life excluding health and index-linked and unit-linked</i>	
R0340	<i>Life index-linked and unit-linked</i>	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	
R0370	Reinsurance receivables	
R0380	Receivables (trade, not insurance)	56
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	5,235
R0420	Any other assets, not elsewhere shown	
R0500	<b>Total assets</b>	<b>34,677</b>

		Solvency II value C0010
<b>Liabilities</b>		
R0510	Technical provisions - non-life	15,642
R0520	<i>Technical provisions - non-life (excluding health)</i>	15,642
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	14,492
R0550	<i>Risk margin</i>	1,150
R0560	<i>Technical provisions - health (similar to non-life)</i>	0
R0570	<i>TP calculated as a whole</i>	0
R0580	<i>Best Estimate</i>	0
R0590	<i>Risk margin</i>	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	<i>Technical provisions - health (similar to life)</i>	0
R0620	<i>TP calculated as a whole</i>	
R0630	<i>Best Estimate</i>	
R0640	<i>Risk margin</i>	
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	0
R0660	<i>TP calculated as a whole</i>	
R0670	<i>Best Estimate</i>	
R0680	<i>Risk margin</i>	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	<i>TP calculated as a whole</i>	
R0710	<i>Best Estimate</i>	
R0720	<i>Risk margin</i>	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	337
R0790	Derivatives	6
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	0
R0830	Reinsurance payables	0
R0840	Payables (trade, not insurance)	479
R0850	Subordinated liabilities	0
R0860	<i>Subordinated liabilities not in BOF</i>	
R0870	<i>Subordinated liabilities in BOF</i>	0
R0880	Any other liabilities, not elsewhere shown	1
R0900	<b>Total liabilities</b>	16,464
R1000	<b>Excess of assets over liabilities</b>	18,213

## Appendix 2 – QRT S.05.01.02 Non-life premiums, claims and expenses by line of business

S.05.01.02

Premiums, claims and expenses by line of business

Non-life

	Line of business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)											Line of business for: accepted non-proportional reinsurance					Total
	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	Misc. financial loss	Health	Casualty	Marine, aviation and transport	Property	
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
<b>Premiums written</b>																	
R0110 Gross - Direct Business							7,098	2,183		78		495					9,855
R0120 Gross - Proportional reinsurance accepted																	0
R0130 Gross - Non-proportional reinsurance accepted							7,098	2,183		78		495					9,855
R0140 Reinsurers share							0	0		0		0					0
R0200 Net																	0
<b>Premiums earned</b>																	
R0210 Gross - Direct Business							7,038	2,134		85		490					9,748
R0220 Gross - Proportional reinsurance accepted																	0
R0220 Gross - Non-proportional reinsurance accepted							7,038	2,134		85		490					9,748
R0230 Gross - Non-proportional reinsurance accepted							0	0		0		0					0
R0240 Reinsurers share																	0
R0300 Net																	0
<b>Claims incurred</b>																	
R0310 Gross - Direct Business							3,429	525		0		66					4,020
R0320 Gross - Proportional reinsurance accepted																	0
R0330 Gross - Non-proportional reinsurance accepted							3,429	525		0		66					4,020
R0340 Reinsurers share							0	-8		0		0					-8
R0400 Net																	0
<b>Changes in other technical provisions</b>																	
R0410 Gross - Direct Business																	0
R0420 Gross - Proportional reinsurance accepted																	0
R0430 Gross - Non-proportional reinsurance accepted																	0
R0440 Reinsurers share							0	0		0		0					0
R0500 Net																	0
<b>Expenses incurred</b>																	
R0550 Other expenses							-784	-620		2		-136					-1,538
R1200 Other expenses																	-1,538
R1300 Total expenses																	-1,538

## Appendix 3 – QRT S.05.02.01 Non-life premiums, claims and expenses by country

S.05.02.01

Premiums, claims and expenses by country

Non-life

	C0010	C0020	C0030	C0040	C0050	C0060	C0070
	Top 5 countries (by amount of gross premiums written) - non-life obligations						Total Top 5 and home country
Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations						Total Top 5 and home country
	IE						
R0010	C0080	C0090	C0100	C0110	C0120	C0130	C0140
<b>Premiums written</b>							
R0110	Gross - Direct Business	9,466	388				9,855
R0120	Gross - Proportional reinsurance accepted	0	0				0
R0130	Gross - Non-proportional reinsurance accepted	0	0				0
R0140	Reinsurers' share	9,466	388				9,855
R0200	Net	0	0	0	0	0	0
<b>Premiums earned</b>							
R0210	Gross - Direct Business	9,357	391				9,748
R0220	Gross - Proportional reinsurance accepted	0	0				0
R0230	Gross - Non-proportional reinsurance accepted	0	0				0
R0240	Reinsurers' share	9,357	391				9,748
R0300	Net	0	0	0	0	0	0
<b>Claims incurred</b>							
R0310	Gross - Direct Business	3,686	334				4,020
R0320	Gross - Proportional reinsurance accepted	0	0				0
R0330	Gross - Non-proportional reinsurance accepted	0	0				0
R0340	Reinsurers' share	3,693	334				4,027
R0400	Net	-8	0	0	0	0	-8
<b>Changes in other technical provisions</b>							
R0410	Gross - Direct Business	0	0				0
R0420	Gross - Proportional reinsurance accepted	0	0				0
R0430	Gross - Non-proportional reinsurance accepted	0	0				0
R0440	Reinsurers' share	0	0				0
R0500	Net	0	0	0	0	0	0
R0550	Expenses incurred	-1,538	0				-1,538
R1200	Other expenses						
R1300	Total expenses						-1,538

## Appendix 4 – QRT S.17.01.02 Non-life technical provisions

S.17.01.02

### Non-Life Technical Provisions

Direct business and accepted proportional reinsurance												Accepted non-proportional reinsurance				Total Non-Life obligation							
	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 reinsurance	Non-proportional property reinsurance							
R0100	Technical provisions calculated as a whole																						
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																	0						
R0250	Best estimate																0						
Technical provisions calculated as a sum of BE and RM Best estimate																							
Premium provisions																							
R0060	Gross																1,113	321	-12	58			1,480
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default																2,146	372	-10	74			2,583
R0150	Net Best Estimate of Premium Provisions																-1,034	-51	-3	-16			-1,103
Claims provisions																							
R0160	Gross																2,561	10,288	0	164			13,013
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default																2,493	4,699	0	164			7,316
R0250	Net Best Estimate of Claims Provisions																68	5,629	0	0			5,697
R0260	Total best estimate - gross																3,073	10,699	-12	222			14,492
R0270	Total best estimate - net																-966	5,578	-3	-16			4,593
R0280	Risk margin																405	722	0	23			1,150
Amount of the transitional on Technical Provisions																							
R0290	Technical Provisions calculated as a whole																						0
R0300	Best estimate																						0
R0310	Risk margin																						0
R0320	Technical provisions - total																4,078	11,331	-12	245			15,642
R0330	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total																4,640	5,031	-10	238			9,899
R0340	Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total																-561	6,300	-3	8			5,743

## Appendix 5 – QRT S.19.01.21 Non-life insurance claims

S.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020 Accident year / underwriting year

Gross Claims Paid (non-cumulative)																
(absolute amount)																
Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180			
Development year	0	1	2	3	4	5	6	7	8	9	10 & +	In Current year	Sum of years (cumulative)			
Prior												265	265	265	265	265
R0100																
R0160	1,601	1,085	228	293	123	43	4	83	0	0	0	0	0	3,460	0	3,460
R0170	1,634	2,100	366	-49	416	65	1	29	0			0	0	4,562	0	4,562
R0180	1,645	887	314	505	57	41	86	-51				-51	-51	3,485	0	3,485
R0190	1,564	1,132	263	323	106	167	0					0	0	3,555	0	3,555
R0200	852	932	211	93	152	207						207	207	2,448	0	2,448
R0210	1,432	1,214	261	45	267							267	267	3,218	0	3,218
R0220	1,164	2,246	459	135								135	135	4,004	0	4,004
R0230	1,201	679	176									176	176	2,056	0	2,056
R0240	1,058	1,159										1,159	1,159	2,217	0	2,217
R0250												1,681	1,681	2,217	0	2,217
R0260	1,681													1,681	0	1,681
<b>Total</b>																30,952

Gross Undiscounted Best Estimate Claims Provisions																
(absolute amount)																
Year	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	C0360			
Development year	0	1	2	3	4	5	6	7	8	9	10 & +	Year end (discounted data)	Sum of years (cumulative)			
Prior												7,241	6,440	6,440	6,440	6,440
R0100												143	127	127	127	127
R0160	0	0	0	0	0	0	0	166	119			167	167	167	167	167
R0170	0	0	0	0	0	0	166	114	188			169	169	169	169	169
R0180	0	0	0	0	0	265	158	188				137	137	137	137	137
R0190	0	0	0	0	291	103	154					258	258	258	258	258
R0200	0	0	0	600	647	290						185	185	185	185	185
R0210	0	0	608	527	206							1,299	1,299	1,299	1,299	1,299
R0220	0	2,763	1,711	1,363								393	393	393	393	393
R0230	2,217	966	435									1,188	1,188	1,188	1,188	1,188
R0240	2,390	1,308										2,651	2,651	2,651	2,651	2,651
R0250	2,810															
R0260																
<b>Total</b>																13,013

Appendix 6 – QRT S.23.01.01 Own Funds

5.23.01.01  
Own Funds

Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/25

R0010	Ordinary share capital (gross of own shares)				
R0030	Share premium account related to ordinary share capital				
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings				
R0050	Subordinated mutual member accounts				
R0070	Surplus funds				
R0090	Preference shares				
R0110	Share premium account related to preference shares				
R0130	Reconciliation reserve				
R0140	Subordinated liabilities				
R0160	An amount equal to the value of net deferred tax assets				
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above				
R0220	Own funds from the financial statements that should not be represented by the reconciliation on reserve and do not meet the criteria to be classified as Solvency II own funds				
R0230	Deductions for participations in financial and credit institutions				
R0290	Total basic own funds after deductions				
R0300	Ancillary own funds				
R0310	Unpaid and uncalled ordinary share capital callable on demand				
R0320	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand				
R0330	Unpaid and uncalled preference shares callable on demand				
R0340	A legally binding commitment to subscribe and pay for subordinated liabilities on demand				
R0350	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC				
R0360	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC				
R0370	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC				
R0390	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC				
R0400	Other ancillary own funds				
R0400	Total ancillary own funds				
R0500	Available and eligible own funds				
R0510	Total available own funds to meet the SCR				
R0510	Total available own funds to meet the MCR				
R0540	Total eligible own funds to meet the SCR				
R0550	Total eligible own funds to meet the MCR				
R0590	SCR				
R0600	MCR				
R0620	Ratio of Eligible own funds to SCR				
R0640	Ratio of Eligible own funds to MCR				
R0700	Reconciliation reserve				
R0700	Excess of assets over liabilities				
R0710	Own shares (held directly and indirectly)				
R0720	Foreseeable dividends, distributions and charges				
R0730	Other basic own fund items				
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds				
R0760	Reconciliation reserve				
R0770	Expected profits				
R0770	Expected profits included in future premiums (EPFP) - Life business				
R0780	Expected profits included in future premiums (EPFP) - Non- life business				
R0790	Total Expected profits included in future premiums (EPFP)				

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
113	113			0
0	0			0
0	0			0
0		0		0
0	0			0
0				0
0				0
18,100	18,100			0
0		0		0
0				0
0	0	0		0
0				0
0				0

0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0				

18,213	18,213	0	0	0
18,213	18,213	0	0	0
18,213	18,213	0	0	0
18,213	18,213	0	0	0

5,700
3,288
319,55%
553.87%

C0060
18,213
0
113
0
18,100

172
172



## Appendix 7 – QRT S.25.01.21 Solvency Capital Requirement

S.25.01.21

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

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
R0010 Market risk	4,010		
R0020 Counterparty default risk	1,506		
R0030 Life underwriting risk	0		
R0040 Health underwriting risk	0		
R0050 Non-life underwriting risk	1,863		
R0060 Diversification	-1,777		
R0070 Intangible asset risk	0		
R0100 <b>Basic Solvency Capital Requirement</b>	5,601		
<b>Calculation of Solvency Capital Requirement</b>			
	C0100		
R0130 Operational risk	435		
R0140 Loss-absorbing capacity of technical provisions	0		
R0150 Loss-absorbing capacity of deferred taxes	-337		
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200 <b>Solvency Capital Requirement excluding capital add-on</b>	5,700		
R0210 Capital add-ons already set	0		
R0220 <b>Solvency capital requirement</b>	5,700		
<b>Other information on SCR</b>			
R0400 Capital requirement for duration-based equity risk sub-module	0		
R0410 Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420 Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430 Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440 Diversification effects due to RFF nSCR aggregation for article 304	0		

## Appendix 8 – QRT S.28.01.01 Minimum Capital Requirement

S.28.01.01

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

<b>Linear formula component for non-life insurance and reinsurance obligations</b>		C0010			
R0010	MCR <sub>NI</sub> Result		575		
				Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
				C0020	C0030
R0020	Medical expense insurance and proportional reinsurance		0	0	0
R0030	Income protection insurance and proportional reinsurance		0	0	0
R0040	Workers' compensation insurance and proportional reinsurance		0	0	0
R0050	Motor vehicle liability insurance and proportional reinsurance		0	0	0
R0060	Other motor insurance and proportional reinsurance		0	0	0
R0070	Marine, aviation and transport insurance and proportional reinsurance		0	0	0
R0080	Fire and other damage to property insurance and proportional reinsurance		0	0	0
R0090	General liability insurance and proportional reinsurance		5,578	0	0
R0100	Credit and suretyship insurance and proportional reinsurance		0	0	0
R0110	Legal expenses insurance and proportional reinsurance		0	0	0
R0120	Assistance and proportional reinsurance		0	0	0
R0130	Miscellaneous financial loss insurance and proportional reinsurance		0	0	0
R0140	Non-proportional health reinsurance		0	0	0
R0150	Non-proportional casualty reinsurance		0	0	0
R0160	Non-proportional marine, aviation and transport reinsurance		0	0	0
R0170	Non-proportional property reinsurance		0	0	0
<b>Linear formula component for life insurance and reinsurance obligations</b>		C0040			
R0200	MCR <sub>L</sub> Result		0		
				Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
				C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits				
R0220	Obligations with profit participation - future discretionary benefits				
R0230	Index-linked and unit-linked insurance obligations				
R0240	Other life (re)insurance and health (re)insurance obligations				
R0250	Total capital at risk for all life (re)insurance obligations				
<b>Overall MCR calculation</b>		C0070			
R0300	Linear MCR		575		
R0310	SCR		5,700		
R0320	MCR cap		2,565		
R0330	MCR floor		1,425		
R0340	Combined MCR		1,425		
R0350	Absolute floor of the MCR		3,288		
R0400	Minimum Capital Requirement		3,288		

## Appendix 9 – Glossary of abbreviations

The Company	Methodist Insurance PLC
The Board	The Board of Directors of the Company
The Administrator	Outsource provider of insurance management and administration
The Directive	Solvency II Directive 2009/138/EC
The Delegated Act	Solvency II Delegated Regulation (EU) 2015/35
AIA	Internal Audit function of the Administrator
ARC	Audit, Risk and Compliance Committee
CFO	Chief Financial Officer
Compliance	Compliance function of the Administrator
CRO	Chief Risk Officer
EIOPA	European Insurance and Occupational Pensions Authority
EMU	European & Economic Monetary Union
ENID	Events Not in Data
EU	European Union
F&O	Fire & Other Property Damage
FCA	Financial Conduct Authority
GEP	Gross Earned Premiums
GIC	Gross Incurred Claims
GL	General Liability
GWP	Gross written premium
IAS	International Accounting Standard
IBNR	Incurred but not reported
IC	Investment Committee
IFRS	International financial reporting standards
JAA	Joint Administration Agreement
KFHs	Key Function Holders
MCR	Minimum Capital Requirement
NED	Non-Executive Director
OCR	Outstanding Case Reserves
OEICs	Open Ended Investment Companies
ORSA	Own Risk and Solvency Assessment Report
PSA	Physical and Sexual Abuse
QRT	Quantitative Reporting Template
SII	Solvency II
SCR	Solvency Capital Requirement
SFCR	Solvency and Financial Condition Report
SIMR	Senior Insurance Managers Regime
TPs	Technical provisions
UPR	Unearned Premium Reserve