

# ASHBROOKE REINSURANCE (IRELAND) DAC

Ashbrooke Reinsurance (Ireland) Designated Activity Company

Solvency and Financial Condition Report

For the Reporting Period Ended 31 March 2025  
(the “reporting period”)

**Approved by the Board on 23 June 2025**

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# ASHBROOKE REINSURANCE (IRELAND) DAC

## Executive Summary

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This report refers to the business of Ashbrooke Reinsurance (Ireland) Designated Activity Company, an authorised reinsurer supervised by the Central Bank of Ireland. It provides the reader with information on the Company's business and performance, systems of governance, risk profile and valuation for solvency purposes and capital management for the reporting period ended 31 March 2025.

The purpose of this report is to satisfy the public disclosure requirements under the European Union (Insurance & Reinsurance) Regulations 2015 including the applicable European Commission Delegated Regulations and European Commission Implementing Regulations.

Ashbrooke Reinsurance (Ireland) DAC is a reinsurance company which is domiciled in Ireland and forms part of the Ashbrooke Financial Group.

The principal activities of Ashbrooke Financial Group Limited are the acquisition of insurance companies and portfolios in the legacy insurance market and the provision of outsourcing and consultancy services related to the management and administration of insurance operations.

The primary strategic objective and purpose of the Company is to continue to work towards the finalisation of the run off of the Company over the next twelve months. This finalisation includes the cessation of all regulated activities and the cancellation of its permissions and so the Company would no longer be subject to regulation by the Central Bank of Ireland.

The Board of the Company is ultimately accountable and responsible for the performance and conduct of the Company and has appointed four key function holders (Compliance, Internal Audit, Risk Management and Actuarial) and a Management Services Provider to ensure the Company is governed effectively and in line with its regulatory obligations.

There have been no material changes to the Company's business and performance, system of governance, risk profile, valuation for solvency purposes and capital management over the reporting period.

*Where there is limited detail provided in a particular section, a proportionate approach has been taken due to the nature, scale and complexity of the Company. Some figures in the tables in this report are rounded to the nearest GBP 1,000. Consequently, some totals may not be the sum of the individual items due to rounding.*

# ASHBROOKE REINSURANCE (IRELAND) DAC

## Section A: Business and Performance

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### A.1 Business

The name and legal form of the Company is Ashbrooke Reinsurance (Ireland) Designated Activity Company. The Company's business is the management of the claims in run-off.

The Company holds a Certificate of Authorisation from the Central Bank of Ireland to carry out the business of reinsurance (Ref. No. C37890) pursuant to the European Union (Insurance and Reinsurance) Regulations 2015 (SI 485). Its registered office and place of business is 13 Fitzwilliam Street Upper, Dublin 2.

The Insurance Supervision Division of the Central Bank of Ireland may be contacted at:  
General Insurance Supervision  
Central Bank of Ireland  
New Wapping Street,  
North Wall Quay,  
Dublin 1.  
Telephone: +353 1 224 4000.

The name and contact details of the Company's external auditors are:  
Forvis Mazars  
Chartered Accountants and Statutory Audit Firm  
Harcourt Centre, Block 3,  
Harcourt Road,  
Dublin 2.  
Telephone +353 1 449 4400

The Company is a wholly owned subsidiary of Bestpark International Limited, incorporated in the UK. The ultimate holding Company is Ashbrooke Financial Group Limited, also based in the UK.

Third Party Motor

Property & Business  
Interruption

Liability

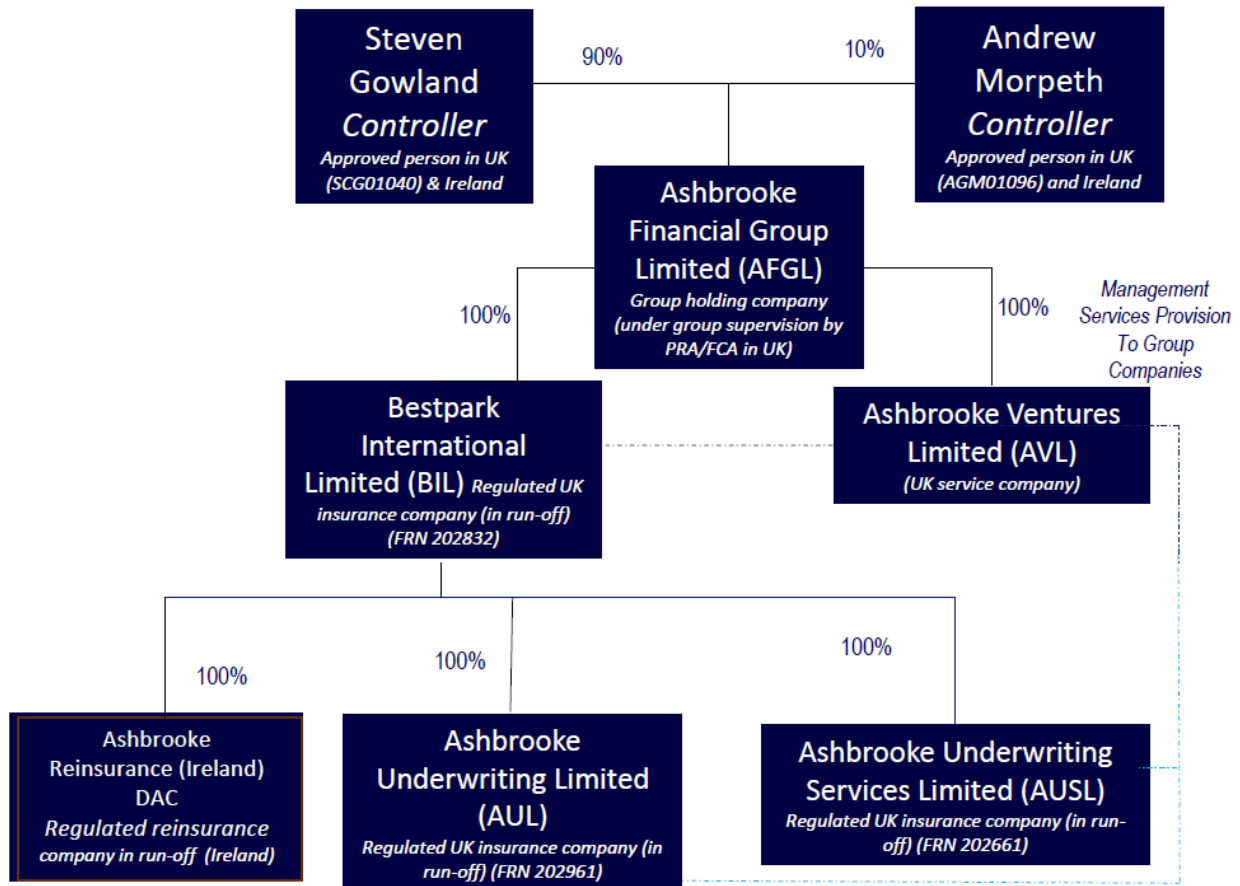
All underwriting activity ceased with effect from 1 April 2017. The Company continues to manage the orderly run off of claims while working towards the finalisation of the run off of the Company.

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## A.1.1 Group Structure

### ASHBROOKE GROUP

#### CURRENT GROUP STRUCTURE



# ASHBROOKE REINSURANCE (IRELAND) DAC

## A.2 Underwriting Performance

The underwriting performance of the Company has been positive with an underwriting profit reported of £187k over the reporting period, compared to an underwriting profit of £217k over the previous reporting period. An analysis of the performance is summarised as follows:

### 31 March 2025

Line of Business	Total	Liability	Property	Motor
Underwriting Income	-	-	-	-
Underwriting Expenses	-	-	-	-
Investment Return	186,903	-	-	-
Underwriting Profit	<b>186,903</b>	-	-	-

### 31 March 2024

Line of Business	Total	Liability	Property	Motor
Underwriting Income	-	-	-	-
Underwriting Expenses	90,397	90,397	-	-
Investment Return	126,575	-	-	-
Underwriting Profit	<b>216,972</b>			

## A.3 Investment Performance

- (a) The Company maintains its investments in cash equivalents, short-term deposits with EU regulated credit institutions and an inter-company loan with the Company's parent company Bestpark International Limited which is repayable on demand. The income on these investments over the reporting period was £187k compared to £127k over the previous reporting period.
- (b) The below table summarizes the deposits by counterparty together with interest income as reported in the financial statements.

	2025	2024	Variance
Bank 1 Call Account	55,136	114,311	(59,175)
Bank 1 Current Account	7,849	8,868	(1,019)
Bank 1 Deposit Accounts	1,749,889	2,578,384	(828,495)
Intercompany Loan	1,738,318	-	1,738,318
Total	3,551,192	2,701,563	849,629
Interest Income	186,903	126,575	60,328

- (c) No gains or losses were recognised directly in equity.
- (d) The Company had no investments in securitisations, during the reporting period or previous reporting period.

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

The Company does not carry out any other activities other than the reinsurance business described in A.1 above.

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

There have been no other material developments regarding the business and performance of the Company during the reporting period.

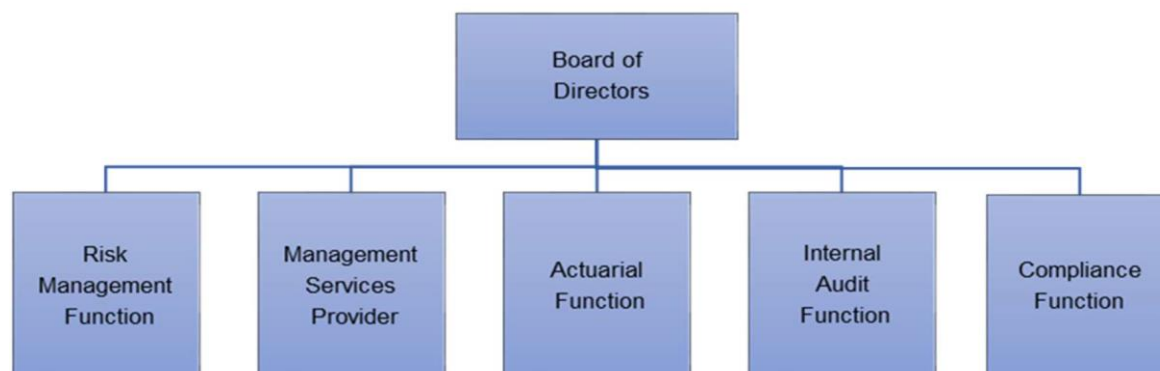
# ASHBROOKE REINSURANCE (IRELAND) DAC

## Section B: System of Governance

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### B.1 General Information on the System of Governance

The organisational structure of the Company is as follows:



The Board is the focal point of the corporate governance regime. It is ultimately accountable and responsible for the performance and conduct of the Company. As a legacy of its former status as a captive reinsurance company, the Company has no direct employees. Therefore, to ensure that the Company satisfies all regulatory and statutory requirements related to its operations, it has appointed four key function holders (Compliance, Internal Audit, Risk Management and Actuarial) and a Management Services Provider to ensure adherence to these obligations. Function holders report to the Board directly. In reporting to the Board, the holders of the above positions ensure that they provide information, which is timely, accurate and sufficiently detailed so as to enable the Board to make informed decisions and discharge its duties appropriately.

The Company's Board has ultimate responsibility for the oversight of the business and sets its strategy and risk appetite. The Company is committed to high standards of corporate governance. The Company takes a risk-based approach to the system of governance taking into consideration the nature, scale and complexity of its business.

The Company has formalised and documented its governance structures and responsibilities within its Corporate Governance Manual (CGM) which is updated, together with the supporting policies, and reviewed by the Board on an annual basis.

#### Board of Directors

The Board is comprised of only those persons with sufficient knowledge of the Company's business and the environment in which it operates so as to properly contribute to the effective running of the Company and the achievement of its objectives.

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The Board members must have:

- The necessary knowledge, skills, experience, expertise, competencies, professionalism, fitness, probity and integrity to carry out their duties;
- A full understanding of the nature of the Company's business, material activities and related risks;
- A full understanding of their individual direct and indirect responsibilities and collective responsibilities; and
- An understanding of the Company's financial statements and key performance drivers.

The Company is controlled and directed through the Board which consists of the following senior personnel who have been selected to ensure that the Company is being run by individuals of appropriate expertise and integrity and who meet the criteria set out above:

James Deeny - Independent Non-Executive Director (Irish)

Steven Gowland - Executive Director and CEO (British)

Andrew Morpeth - Non-Executive Director (British)

Charles Singh - Non-Executive Director (British)

Henry Anson Game - Chair & Independent Non-Executive Director (British)

The Board formally meets at least four times annually and there is additional interaction between members of the Board throughout each reporting period. In accordance with the Corporate Governance Requirements for Insurance Undertakings, the Company is required to establish an Audit and Risk committee. The Board applied for and received a derogation from the Central Bank for the Board to act as the Audit and Risk Committee.

The Company has provided Bestpark International Limited with an intercompany loan. The amount of the loan at the end of the reporting period is £1,738,318. Interest earned on the loan is at a commercial rate of interest. The Company may request repayment of the loan, in whole or in part, on demand without qualification.

As documented in the CGM, the key responsibilities of the Board are to:

- Ensure the appropriate knowledge, skills, experience and commitment exists within the Board to oversee the reinsurance undertaking effectively and must be such that it provides for the effective, prudent and efficient administration of the activities of the reinsurance undertaking;
- Set out the corporate governance principles, responsibilities, and commitments appropriate to the reinsurance undertaking and ensure they are communicated throughout the reinsurance undertaking;



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- Establish policies and strategies to ensure compliance with principles, responsibilities, and commitments and to establish procedures for monitoring and evaluating the progress towards them;
- Approve and oversee the management of all renewal processes, including signing off on outwards reinsurance as necessary;
- Satisfy itself that the reinsurance undertaking is organised in a way that promotes the effective and prudent management of the undertaking and the Board's oversight of that management;
- Distinguish between the responsibilities, decision-making, interaction and cooperation of the Board, Chair and other senior management. The undertaking must have a clear division of responsibilities that will ensure a balance of power and authority, so that no one individual has unfettered powers of decision without adequate consultation;
- Collectively ensure that the reinsurance undertaking complies with all relevant laws, regulations and any established codes of conduct. The Board must identify a Head of Compliance whose function is to monitor compliance with all of the relevant legislation and required standards of business conduct and who reports to the Board at regular intervals to enable the Board to ensure compliance; and
- Ensure an open and transparent communication with the Central Bank.

## **Key Functions**

The main roles and responsibilities of the key functions are as follows:

### **Compliance**

- Ensure the Company is kept up to date with the Central Bank of Ireland's compliance standards;
- Obtain the approval of the Board of Directors for policy statements on compliance with all applicable regulations, with the requirements of the Central Bank of Ireland and with any other applicable legislation; and
- Monitor the implementation of compliance procedures and to report periodically to the Board of Directors thereon.

### **Actuarial**

- Review of the reliability and adequacy of the calculation of technical provisions, including the appropriateness of methodologies adopted and the sufficiency and quality of data used;
- Comparison of best estimates against experience;

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- Express an opinion on the Company's overall underwriting policy;
- Express an opinion on the adequacy of reinsurance arrangements; and
- Contribute to the effective implementation of the Company's risk management system.

## Internal Audit

- Review and assess compliance with, and the efficacy of, the Company's governance arrangements, operational procedures and internal controls;
- Report to the Audit Committee on scope of work to be carried out and subsequent findings and recommendations; and
- Check to ensure that any agreed recommendations arising from internal audit reviews are implemented by the Company.

## Risk Management

- Monitoring and managing the risks to which the Company is exposed;
- Reporting into the Risk Committee and Board on the Company's risks and the processes established to identify and manage risks;
- Ensuring that risk management is well integrated into the organisation structure of the Company and its decision-making processes; and
- Reporting to the Board through the Risk Committee on the current status of any risks identified which need to be brought to their attention.

The Board ensures that the function holders have the necessary authority, resources, and operational independence to carry out their tasks. This is achieved by ensuring clearly documented terms of reference, policies and procedures are in place and agreed by all parties, and by having an open communication channel between the Board and the function holders. The Company has also appointed a named Chief Risk Officer who reports to the Board on all risk related matters.

## Remuneration

Due to the scale, nature and complexity of the Company, with no full-time employees, the Company has not required the establishment of a remuneration policy. Directors who are not employees of the Company but who are employed by another group company or by a service provider company, receive no remuneration for the performance of their duties as directors. Independent Non-Executive directors receive remuneration based on Irish market standard rates. Directors are entitled to the reimbursement of normal business expenses associated with their travel to the Company's main place of business for the purpose of discharging their duties as directors.

## Changes and Material Transactions

As consequence of the sale of the Company in 2024, the Company was no longer defined as a captive reinsurance company but was reclassified as a reinsurance company requiring additional share capital which was issued in June 2024.

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## B.2 Fit and Proper Requirements

(a) The Company has adopted a Fitness and Probity Policy which sets out the due diligence checks that must be performed in accordance with the CBI's Guidance on Fitness and Probity Standards. The Company recognises the importance and value of the fit and proper requirements, and it has a system in place to review the ability, competence, skills and integrity of candidates for a position on the Board or for other Key Functions.

*Selection and recruitment process for Key Function Holders (referred to as Pre-Approval Control Functions or PCF's):*

- A written job description outlining the duties and responsibilities for the role.
- An assessment of the level of fitness and probity required for the role.
- Capture fitness and probity due diligence referred to below.
- Upon CBI approval, letter of appointment issued and training provided.

(b) The processes for assessing the fitness and the propriety of the persons in PCF positions is summarised as follows:

- The Company conducts its own fitness and probity due diligence before proposing a person for appointment to a PCF. The due diligence required is referenced within the CBI's Guidance on Fitness and Probity Standards. The following is captured:
  - Evidence of a relevant professional qualification.
  - Confirmation of continuous professional development.
  - Evidence of professional membership of an organisation (where applicable).
  - Reference checks.
  - Review record of previous experience, including a review of curriculum vitae.
  - Record of experience gained outside the State (where applicable) – consider the extent to which the person can demonstrate competency that relates specifically to the function within the State.
  - Review of list of directorships and concurrent responsibilities.
  - Checks are also undertaken with the Regulator; Companies House and a judgment debt check is performed.
  - Signed Fitness and Probity declarations.
  - Individual Questionnaire.
- A PCF holder from the Company will review the Individual Questionnaire, complete a declaration on behalf of the Company and submit the Individual Questionnaire to the Central Bank of Ireland for assessment.
- As part of the continuing obligations, annual declarations are sought from all PCF's, each PCF file is reviewed, and an annual PCF return is submitted to the Central Bank of Ireland via the online reporting system.

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- The Company ensures that it is in full compliance with the requirements of the CBI's Individual Accountability Framework. There is an annual certification process to determine that each key function holder continues to remain fit for the role they occupy. A Board Director reviews the PCF/CF assessments before signing the Certification letter.

## B.3 Risk Management System

- (a) The Company has established a number of risk management policies, including: Risk Appetite Statement which includes an escalation procedure, Operational Risk Policy and Capital Risk and Capital Management Policy. The Company defines operational risk as the risk of loss arising from people, processes or systems, or external events. This includes risks such as regulatory risk and such operational risks of fraud risk, IT risk, market risk and reputational risk. It excludes quantifiable risks. Quantifiable risks are set out in the Company's Risk Appetite Statement. The Risk Appetite Statement is subject to a detailed annual review by the Board. The Company aims for zero operational risk loss events, and whilst such risk cannot be eliminated completely, the strategy is to minimise such risk through a robust governance framework, systems and controls.
- (b) The risk management system including the risk management function are implemented and integrated into the organisational structure and decision-making processes of the Company via:
- review and ongoing maintenance of risk related policies by the Board
  - adherence with and annual review of the Company's Risk Appetite Statement
  - adequately resourced critical functions of risk management, compliance and actuarial staffed by experienced professionals
  - adequately resourced internal audit function with a regular review cycle
  - business continuity planning
  - succession plan for key roles
  - quarterly underwriting and financial reporting

The management and monitoring of risks to the business is an on-going process which is integrated into the overall organisational structure of the Company. The Own Risk and Solvency Assessment process referred to in the following section is a key component in the Company's risk management and decision-making processes.

The primary strategic objective and purpose of the Company is to commute/terminate the limited number of reinsurance agreements that the Company has in place with the fronting insurance companies. Once all inwards/fronting reinsurance contracts have been terminated, there would be no actual or potential insurance liabilities remaining within the Company. At this point, an application will be made to the Central Bank to have the Company de-registered

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as a regulated reinsurance undertaking. Once permission is received, an orderly winding up of the company will be sought.

## B.4 Own Risk and Solvency Assessment (“ORSA”)

### ORSA Process

In line with the Company’s ORSA policy, a full ORSA is performed each year. A full or partial ORSA would also be performed in the event of a known or expected event that could cause the risk profile of the Company to change.

The objective of the ORSA process is to enable the Board to assess capital adequacy in light of the assessment of its risks and the potential impacts of its risk environment and enable it to make appropriate strategic decisions. The Board requires that the ORSA process produces meaningful reports on the adequacy of the Company’s capital and risk sensitivities so that the output can be used in shaping future strategy and risk appetite.

### Risk Identification

The first step in the ORSA process is to consider and identify which risks should be assessed. The previous ORSA Processes are built upon in this regard. In addition, claims are assessed to identify any new or increasing areas of risk.

### Standard Model Training

The Board has participated in a Standard Model training session, during which many aspects of the Company’s risks and capital requirements were discussed and deliberated. Induction training is provided to all new Board members along with annual training sessions.

### Financial Projections

Notwithstanding the intention to finalise the run-off of the Company, the Profit and Loss Account and Balance Sheet of the Company are projected for each of the next 4 years. The accounts are projected on a GAAP basis and converted to Solvency II balance sheets to calculate the solvency capital requirements.

Using the projected Balance Sheet, the Company’s capital requirements are also calculated for each of the next 4 years on a Solvency II basis. The Board is then able to use these projections to see the medium-term position of the Company in relation to its capital requirements over the period.

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## Stress & Scenario Testing

The third step of this ORSA process is for the Board and Management to examine the impact of a range of stresses and scenarios on the Company's solvency position. These included both quantitative and qualitative scenarios, and a reverse stress test approach to identify how severe a loss would have to be to result in a breach of solvency. The proposed stresses and scenario tests are circulated to the Board for consideration, with additions made following Board feedback.

## Board and Management Discussion and Review

The final step in the ORSA Process is the presentation of the Projections, Stress and Scenario Tests to the Board and Management. This prompts further discussion and review of the Scenario and Stress Tests, with further scenarios being considered at the request of the Board.

## Board Sign-off

Following this final iteration, the final ORSA Report is reviewed and approved by the Board.

## Integration into Decision-making process

The results of the ORSA projections were used to inform, inter alia, dividend policy, limit and retention structure and investment policy. Recent examples include:

- Diversification of bank deposit holdings to reduce the Company's Market Risk;
- Establishment of a dividend policy to maintain an appropriate level of buffer over the SCR.

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## B.5 Internal control

### Internal Control System

The principal control framework for the Company is its controls set at Board level. These controls include the Board approved policies, reports, terms of reference, schedule of matters and minutes of board meetings. The policies describe the Board's approach to key areas of the business. The Board is ultimately responsible for overseeing and maintaining the adequacy and effectiveness of the internal control system, however day-to-day oversight is provided by the Compliance Officer. In practice, other Directors and key role holders also participate in the management of the system. The Company's internal controls are part of its compliance framework. Various measures are incorporated into systems and processes to control day-to-day activities. The Company implements adequate controls to ensure compliance and to highlight any significant breakdown in controls or inadequacy of process.

The Compliance Officer is responsible for ensuring that all Company policies are fit for purpose. The relevant area of the business is responsible for ensuring that its procedures are up to date and reflect how the business operates. All amendments are submitted to the Board for approval. There is a compliance monitoring programme in place to review all of its regulatory requirements. This is completed by the Compliance Officer on a regular basis and forms part of the compliance report to the Board.

The Company has established the four key control functions – actuarial, internal audit, compliance, and risk management – and ensured their independence as required under the Corporate Governance Requirements for Insurance Undertakings 2015. These functions are responsible for providing oversight of and challenge to the business and for providing assurance to the Board in relation to the Company's control framework.

Where any functions or activities are outsourced, the Company expects that any outsourcing entity manages its control framework to the same standards as the Company and to adhere to the Company's policies and procedures and to employ fit and proper people in its controlled functions. The Company has a Service Level Agreement in place with each outsourced entity with Key Performance Indicators set to ensure appropriate performance standards and regular reporting to the Board. Attestations are also received from the Service Provider in respect to the ongoing fitness and probity of its Key Control Functions. Any significant or material event that occurs requires immediate reporting to the Board.

### Compliance Function

The Board supports the Compliance Function and shall make available such resource as is necessary. It provides access to all relevant documentation and information from the business for the Compliance Function to fulfil its role.

A Compliance Officer is appointed through a formal outsourcing arrangement with Artex Risk Solutions (Ireland) Limited, (formerly Allied Risk Management Limited) who have responsibility

## ASHBROOKE REINSURANCE (IRELAND) DAC

for the Compliance Function. The Compliance Officer ensures the Company's continuing compliance in relation to its regulatory and legal obligations. It aims to minimise the risks to the Company of material financial loss or reputational damage arising from the potential failure to comply with legal or regulatory requirements. The Compliance Officer liaises with regulatory bodies and authorities and provides updates on changes in legislation and regulatory requirements.

The Compliance Officer has responsibility for the implementation of the Company's Compliance strategy and effective compliance processes and is responsible for the monitoring, managing and reporting of compliance risks to which the Company is exposed. It ensures that arrangements are sufficiently robust, proportionate, effective and efficient. The Compliance Officer is responsible for identifying and evaluating compliance risk, overseeing the implementation of controls for the risks identified, and monitoring their efficiency through Compliance monitoring.

Compliance auditing occurs to check that the Company is adhering to its obligations. Compliance reports are issued to the Board assessing the effectiveness and adequacy of compliance within the Company. The activities of the Compliance function are subject to periodic review by Internal Audit.

On an ongoing basis, the Compliance Officer strives to ensure that there is an organisational culture in place which promotes a high standard of integrity and regulatory compliance.



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## B.6 Internal audit function

The Internal Audit Function is governed by the Company's internal audit policy and is an integral part of the Company's internal control framework. The role is performed by Control Solutions Limited on an outsourced basis.

- The function provides independent and objective assurance services through a formal outsourcing arrangement in respect of the Company's processes with due regard to the adequacy of the governance, risk management and internal control framework;
- Audits are conducted with a Board approved Internal Audit Plan;
- The Head of Internal Audit reports to the Board which oversees the risk-based Audit Plan and outcomes thereof;
- Internal Audit Reports can highlight any significant control failings or weaknesses identified and the impact they have had, or may have and the actions and timings which management have agreed to take to rectify them;
- Internal Audit prepare an annual report for the Board which provides a chosen assessment of the effectiveness of the Company's systems of risk management and internal controls during the reporting period.

It is the responsibility of the Internal Audit Function to independently, but proportionately, assess the effectiveness of the internal control system, governance, and risk management systems and to provide to the Board an evaluation of the adequacy of such systems and controls. The Head of Internal Audit has a duty to highlight any significant control failings or weaknesses identified and the impact they have had, or may have and the actions and timings which management have agreed to take to rectify them.

It is the objective of the Internal Audit Function to provide independent assurance that risk management processes are operating effectively and in accordance with required legislation and regulation. To ensure that effective controls are in place to mitigate risks or reduce those risks to an acceptable level in accordance with the Company's defined risk appetite.

The Internal Audit Function has unrestricted access to senior management and the Board. It is independent from the day-to-day operations of the business which allows it to maintain its independence and objectivity from the activities it reviews. The current structure enables the Head of Internal Audit to provide an independent opinion regarding a system, process or control.

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## B.7 Actuarial function

The Actuarial Function is outsourced to Artex Risk Solutions (Ireland) Limited (formerly known as Allied Risk Management Limited). Artex actuaries attend every board meeting and receive regular updates on claim activity. The Company's Technical Provisions are subject to quarterly review with a report presented annually detailing the Actuarial Function's Best Estimate claims reserves and Solvency II Technical Provisions.

The responsibilities of the Actuarial Function, in line with the Solvency II requirements and guidance from the Central Bank of Ireland, include, but are not limited to implementing/overseeing the following:

- Coordinate the calculation of technical provisions;
- Ensure the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
- Assess the sufficiency and quality of the data used in the calculation of technical provisions;
- Compare best estimates against experience;
- Inform the administrative, management or supervisory body of the reliability and adequacy of the calculation of technical provisions;
- Oversee the calculation of technical provisions in the cases set out in Article 82;
- Express an opinion on the overall underwriting policy;
- Express an opinion on the adequacy of reinsurance arrangements; and
- Contribute to the effective implementation of the risk-management system, in particular with respect to the risk modelling underlying the calculation of the capital requirements and assessment.

## B.8 Outsourcing

The Company has an outsourcing policy the purpose of which is to establish the requirements for identifying, justifying, and implementing outsourcing arrangements for the Company's critical or important operational functions or activities. This policy has been approved by the Board. The Board ensures that an outsourcing arrangement shall not diminish the Company's ability to fulfil its regulatory obligations.

The Outsourcing Policy sets out the following:

- Definition of outsourcing
- Outsourcing risks
- Risk mitigation
- Board and management responsibility

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- Assessment and due diligence on Outsourced Service Provider
- Essential requirements for inclusion in Service Level Agreements
- Management and oversight of outsourced activities
- Reporting requirements
- Table of Outsourced Service Providers
- Business continuity and contingency planning

The Company only enters into an outsourcing arrangement where there is a sound commercial basis for doing so and where it can be effectively managed. A full due diligence process is undertaken prior to any final decision being made as to whether to outsource a material business activity. In undertaking this assessment, the Company adheres to the Central Bank of Ireland's Notification Process for (Re)Insurance Undertakings when outsourcing critical or important function or activities under Solvency II Regulations.

The following is a list of the critical or important functions the Company has outsourced and the jurisdiction in which the Outsourced Service Providers are located:

Outsourced Activity	Outsourced Provider	Jurisdiction
Actuarial Function	Artex Risk Solutions (Ireland) Limited	Ireland
Internal Audit Function	CSI Chartered Accountants Limited	Ireland
Compliance Function	Artex Risk Solutions (Ireland) Limited	Ireland
Risk Management Function	Artex Risk Solutions (Ireland) Limited	Ireland

The person in the Company responsible for the outsourcing of all functions is Mr. Steven Gowland.

### B.9 Assessment of the adequacy of the system of governance

Considering the nature, scale and complexity of the risks inherent in the business, the Company is very satisfied with its assessment of the adequacy and appropriateness of its system of governance.

### B.10 Any other disclosures

There is no other material information regarding the system of governance of the Company.

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## Section C: Risk Profile

### C.1 Risk Profile

The Group prides itself on its risk management and technical expertise. Specific risk management measures relating to the Company's underwriting risks are referred to below.

The Company uses the Solvency II Standard Formula as its measure of economic capital in the quantitative assessment of risk presented below.

#### (a) Underwriting Risk

The Company has previously managed its underwriting risk by writing limits that are reasonable in the context of its free assets; the sum of the aggregate limits for all classes was approximately 45% of the Company's free assets.

Since the Company ceased underwriting in 2017, this risk is limited to the deterioration of claims experience on past exposure periods.

A quantitative breakdown of the underwriting risk as measured by the Solvency II Standard Formula is as follows:

#### 31 March 2025

£'000	SCR
Premium Risk	-
Reserve Risk	14
Diversification Credit	
Premium and Reserve Risk	14
Catastrophe Risk	-
Non-life lapse	-
Diversification Credit	-
Non-life Underwriting Risk SCR	14

#### 31 March 2024

£'000	SCR
Premium Risk	-
Reserve Risk	11
Diversification Credit	-
Premium and Reserve Risk	11
Catastrophe Risk	-
Non-life lapse	-
Diversification Credit	-
Non-life Underwriting Risk SCR	11

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Lapse Risk and Catastrophe Risk are both zero as the Company is in run off and hence does not have any exposure to future risk periods.

### (b) Market risk

The Company's investment assets are with one bank, which is well-rated. The board reviews the balance sheet of Bestpark International Limited to ensure the security of the intercompany loan.

### (c) Currency risk

The Company's business is all denominated in GBP with the exception of a small working EUR current account to meet expenses which are denominated in EUR. Thus, its exposure to currency risk is negligible.

### (d) Credit risk

Credit risk is the risk that a party to a financial instrument will fail to discharge an obligation, thus causing the Company to incur a financial loss.

Financial investments and cash at bank	
£	
Credit risk 2025	
<b>Financial institutions</b>	<b>1,812,874</b>
Credit risk 2024	
<b>Financial institutions</b>	<b>2,712,877</b>

The following table provides information regarding the aggregated credit risk exposure of financial assets per the Standard & Poor's rating agency using their short-term credit rating.

	Loans to group undertakings GBP£	Financial investments, cash and cash equivalents & claims recoverable GBP£
Credit ratings 2025		
A-1	-	1,812,874
<b>Non-Rated</b>	<b>1,738,318</b>	<b>11,314</b>
<b>Total</b>	<b>1,738,318</b>	<b>1,824,188</b>

## ASHBROOKE REINSURANCE (IRELAND) DAC

	Loans to group undertakings GBP£	Financial investments, cash and cash equivalents & claims recoverable GBP£
Credit ratings 2024		
A-1	-	2,701,563
<b>Non-Rated</b>	-	11,314
<b>Total</b>	-	2,712,877

### (e) Liquidity risk

Liquidity risk is the risk that the Company will encounter difficulty in raising funds to meet cash commitments. Liquidity risk may result from the inability to sell financial assets quickly at their fair values, a reinsurance liability falling due for payment earlier than expected or an inability to generate cash inflows as anticipated.

The Company has short term deposits, cash at bank and loans to group undertakings with sufficient funds maturing and available each month to cover normal levels of claims and operation expenses. Should a claim arise at the maximum limit sufficient funds will become available from maturing deposits between notification of the claim and settlement. As such, the Company has determined that liquidity risk does not represent a significant risk to its business.

### (f) Operational risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events, including but not limited to the following risks:

- outsourcing
- business continuity planning
- reputational
- compliance and regulatory

As a reinsurance company writing three treaties operational risk is considered low. This risk is reduced further by the Company's decision not to underwrite the 2017 renewal. As such the operational risk is very limited (compared to a retail insurer for example).

The Company is managed by Artex Risk Solutions (Ireland) Limited (formally known as Allied Risk Management), a professional captive management company with over twenty years' experience in captive management. The Company has a full suite of governance policies and processes which further limit operational risk.

The introduction of Solvency II with its governance requirements (including the requirement for Internal Control, Internal Audit, Actuarial and Risk functions) assists in further reducing operational risk.

# ASHBROOKE REINSURANCE (IRELAND) DAC

## (g) Other material risks

There are no other material risks identified by the Company.

# ASHBROOKE REINSURANCE (IRELAND) DAC

## C.2 (a) Risk Measures

The Company uses the Solvency II Standard Formula as its measure for the quantitative assessment of risk. The Company also has an established Risk Appetite Statement to assess risks in the Company and a description of the measures used therein are as follows. There have been no material changes over the reporting period.

<b>Green</b>	Green represents the <b>Risk Appetite</b> of the Company. It represents the level of risk the Company is willing and able to accept to satisfy its strategic objectives
<b>Amber</b>	Amber represents <b>Risk Tolerances</b> and acceptable variances which will be brought to the attention of Board and will require monitoring
<b>Red</b>	Red represents the <b>Limit</b> for each risk, (where possible) it indicates when action needs to be taken to stop or change a situation which may result in an unacceptable level of risk to the Company

## C.2 (b) The Nature of Material Risk Exposures

The material risk that the Company's exposed to is the risk of adverse claims experience across all lines of business. This is addressed under underwriting risk above and technical provisions below. There have been no material changes over the reporting period.

## C.2 (c) Investments in Accordance with the 'Prudent Person Principle'

The Company is required to invest all assets and particularly assets used to cover the minimum capital requirement and the solvency capital requirement in accordance with the 'prudent person principle'. The prudent person principle defines that the assets must be invested in a manner acceptable to a 'prudent person' – that is the decisions are generally accepted as being sound for the average person.

The Company maintains its assets in cash equivalents and short-term deposits with an EU and UK regulated credit institution and an intercompany loan with the Company's parent.

## C.3 The Nature of Material Risk Concentrations

The Company is not currently exposed to losses arising from future risk periods relating to new business as ceased underwriting in 2017. However claims may be made on the policies in run-off. Notwithstanding this, concentration risk was historically managed through the limit system, whereby the Company cannot lose more than the event or aggregate limit on any one claim or series of claims.



# ASHBROOKE REINSURANCE (IRELAND) DAC

The Company has a diversified investment portfolio and as such has no material investment risk concentration.

## **C.4 Risk Mitigation Practices**

The Company's main risk mitigation technique is to control its exposure through event and aggregate limits.

## **C.5 Liquidity Risk**

The expected profit in future premiums calculated in accordance with Article 260(2) of the Delegated Acts is nil.

## **C.6 Risk Sensitivities**

In its ORSA Process the Company considered a number of both quantitative and qualitative stress and scenarios, including reverse stress tests

## ASHBROOKE REINSURANCE (IRELAND) DAC

The Company uses the Standard Formula dependency calibration of dependencies between the risks covered by the risk modules or sub-modules and of the Basic Solvency Capital Requirement; due to its size and relatively low volume of data, this is a proportionate approach.

### **C.7 Any Other Disclosures**

There is no other material information regarding the risk profile of the Company during the reporting period.

# ASHBROOKE REINSURANCE (IRELAND) DAC

## Section D: Regulatory Balance Sheet

### D.1 (a) Assets

As at 31 March 2025, the Company held the following assets:

Ashbrooke Reinsurance (Ireland) DAC Assets (GBP £'000)	Current Accounting Bases	SII Valuation Principles
<b>Goodwill</b>		
Deferred Acquisition Costs	-	
Intangible Assets		-
Deferred Tax Assets		-
Pension benefit surplus		-
Property, plant & equipment held for own use		-
Investments	1,750	1,754
Property (Other than Own Use)		-
Participations and related undertakings		-
Equities (Other than Participations)	-	-
Equities (Other than Participations) - Listed		-
Equities (Other than Participations) - Unlisted		-
Bonds	-	-
Government and Multilateral Banks		-
Corporate		-
Structured Notes		-
Collateralised Securities		-
Collective Investments Undertakings		-
Derivatives		-
Deposits other than cash equivalents	1,750	1,754
Other Investments		-
Mortgages and Loans Made	1,738	1,738
Mortgages & loans to individuals		-
Other Mortgages & loans	1,738	1,738
Loans on Policies		-
Reinsurance recoverables	-	-
Reinsurance share of TP - non-life excluding health		-
Reinsurance share of TP - health similar to non-life		-
Deposits to cedants		-
Insurance & Intermediaries Receivables	-	-
Reinsurance Receivables		-
Receivables (trade, not insurance)		-
Own Shares		-
Amounts due in respect of own fund items or initial fund called up but not yet paid in		
Cash & Cash Equivalents	63	63
Any Other Assets, Not Elsewhere Shown	16	11
<b>Total assets</b>	<b>3,567</b>	<b>3,567</b>

# ASHBROOKE REINSURANCE (IRELAND) DAC

As at 31 March 2024

Ashbrooke Reinsurance (Ireland) DAC Assets (GBP £'000)	Current Accounting Bases	SII Valuation Principles
<b>Goodwill</b>		
Deferred Acquisition Costs	-	
Intangible Assets		-
Deferred Tax Assets		-
Pension benefit surplus		-
Property, plant & equipment held for own use		-
Investments	1,060	2,587
Property (Other than Own Use)		-
Participations and related undertakings		-
Equities (Other than Participations)	-	-
Equities (Other than Participations) - Listed		-
Equities (Other than Participations) - Unlisted		-
Bonds	-	-
Government and Multilateral Banks		-
Corporate		-
Structured Notes		-
Collateralised Securities		-
Collective Investments Undertakings		-
Derivatives		-
Deposits other than cash equivalents	1,060	2,587
Other Investments		-
Mortgages and Loans Made	-	-
Mortgages & loans to individuals		-
Other Mortgages & loans		-
Loans on Policies		-
Reinsurance recoverables	-	-
Reinsurance share of TP - non-life excluding health		-
Reinsurance share of TP - health similar to non-life		-
Deposits to cedants		-
Insurance & Intermediaries Receivables	-	-
Reinsurance Receivables		-
Receivables (trade, not insurance)		-
Own Shares		-
Amounts due in respect of own fund items or initial fund called up but not yet paid in		
Cash & Cash Equivalents	1,642	123
Any Other Assets, Not Elsewhere Shown	20	11
<b>Total assets</b>	<b>2,722</b>	<b>2,722</b>

## Recognition

Financial assets are recognised when the Company becomes a party to the contractual provisions of the instrument.

# ASHBROOKE REINSURANCE (IRELAND) DAC

## Initial Measurement

All financial assets are initially measured at transaction price (including transaction costs), except for those financial assets classified as at fair value through profit or loss, which are initially measured at fair value (which is normally the transaction price excluding transaction costs).

Realised and unrealized gains and losses arising from changes in the fair value of investments are presented in the non-technical profit and loss account in the period in which they arise. Dividend and interest income are recognised when earned. Investment management and other related expenses are recognised when incurred.

## D.1 (b)

There are no material differences between the bases, methods and main assumptions used for the valuation for solvency purposes and those used for its valuation in financial statements.

## D.2 Technical provisions

31 March 2025

Line Of Business (£'000)	Gross Best Estimate Liability	Risk Margin	Recoverables from Reinsurance contracts and SPVs	Total Technical Provisions net of Recoverables
Proportional Motor Vehicle Liability Reinsurance	-	-	-	-
Proportional Fire and Other Damage to Property Reinsurance	-	-	-	-
Proportional Liability Reinsurance	41	1	-	43
<b>Total</b>	<b>41</b>	<b>1</b>	<b>-</b>	<b>43</b>

# ASHBROOKE REINSURANCE (IRELAND) DAC

31 March 2024

Line Of Business (£'000)	Gross Best Estimate Liability	Risk Margin	Recoverables from Reinsurance contracts and SPVs	Total Technical Provisions net of Recoverables
<b>Proportional Motor Vehicle Liability Reinsurance</b>	-	-	-	-
<b>Proportional Fire and Other Damage to Property Reinsurance</b>	-	-	-	-
<b>Proportional Liability Reinsurance</b>	34	1	-	35
<b>Total</b>	<b>34</b>	<b>1</b>	<b>-</b>	<b>35</b>

Given the late stage in development and relative sparsity of open claims, a case-by-case approach for reserving was possible and more appropriate than a statistical reserving exercise.

The premium provision is zero as the Company is in run off.

The main risk to the technical provisions is the emergence of a large claim or claims. In respect of the claims reserves this risk is considered reasonably low – an analysis of reporting delays for the Company has shown that these are short and liability claims have not emerged over time.

A second risk to the adequacy of the Company's reserves is the deterioration of an existing claim or claims. The Company reviews all open claims on a regular basis and takes an appropriate approach to claim reserving.

For all lines of business, the Company uses the undiscounted best estimate claims provision as a floor for the technical provisions booked in its Financial Statements, with an appropriate margin for prudence added to this figure.

In calculating its technical provisions, the Company has not applied any of the following items:

- The Company does not apply the matching adjustment referred to in Article 77b of Directive 2009/138/EC.
- The Company does not use the volatility adjustment referred to in Article 77d of Directive 2009/138/EC.
- The Company does not apply the transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC.
- The Company does not apply the transitional deduction referred to in Article 308d of Directive 2009/138/EC.

## ASHBROOKE REINSURANCE (IRELAND) DAC

- The Company does not have any recoverables from reinsurance contracts or Special Purpose Vehicles (“SPV”).

There have been no material changes in the relevant assumptions made in the calculation of technical provisions compared to the prior year technical provisions calculations.

# ASHBROOKE REINSURANCE (IRELAND) DAC

## D.3 (a) Other liabilities

As at 31 March 2025, the Company recorded the following liabilities for solvency purposes:

Ashbrooke Reinsurance (Ireland) DAC Liabilities (£'000)	Current Accounting Bases	SII Valuation Principles
Other Technical Provisions		
Contingent Liabilities		-
Provisions Other Than Technical Provisions		-
Pension Benefit Obligations		-
Deposits from Reinsurers		-
Deferred Tax Liabilities		2
Derivatives		-
Debts owed to credit institutions		-
Financial liabilities other than debts owed to credit institutions		-
Insurance & intermediaries payables	-	-
Reinsurance payables		-
Payables (trade, not insurance)		-
Subordinated liabilities	-	-
Subordinated liabilities not in BOF		-
Subordinated liabilities in BOF		-
Any other liabilities, not elsewhere shown	120	120
<b>Total liabilities</b>	<b>120</b>	<b>122</b>

As at 31 March 2024:

Ashbrooke Reinsurance (Ireland) DAC Liabilities (£'000)	Current Accounting Bases	SII Valuation Principles
Other Technical Provisions		
Contingent Liabilities		-
Provisions Other Than Technical Provisions		-
Pension Benefit Obligations		-
Deposits from Reinsurers		-
Deferred Tax Liabilities		3
Derivatives		-
Debts owed to credit institutions		-
Financial liabilities other than debts owed to credit institutions		-
Insurance & intermediaries payables	-	-
Reinsurance payables		-
Payables (trade, not insurance)		-
Subordinated liabilities	-	-
Subordinated liabilities not in BOF		-
Subordinated liabilities in BOF		-
Any other liabilities, not elsewhere shown	74	74
<b>Total liabilities</b>	<b>74</b>	<b>78</b>



# ASHBROOKE REINSURANCE (IRELAND) DAC

## **D.3 (b) Alternative Methods of Valuation**

There are no material differences between the bases, methods and main assumptions used for the valuation for solvency purposes and those used for its valuation in financial statements. However, there exists a deferred tax liability on the Solvency II basis due to the recognition of profits related to the margin for uncertainty held.

## **D.4 Any Other Disclosures**

There are no other disclosures for the Company under this section.

# ASHBROOKE REINSURANCE (IRELAND) DAC

## Section E: Capital Management

### E.1 (a) Own funds

The Company has a documented Capital Management Policy and there is no appetite for losses resulting from a breach of the solvency margin. In addition, the ORSA process is an integral part of the Company's Capital Management process. The outputs of the Actuarial Function Report are also used in the Company's decision-making process in respect of capital management.

The Company is a single shareholder entity whose shares are fully paid up. It has no debt financing, nor does it have any plans to raise debt through issue new shares in the short or medium term.

The Company's own funds are invested in cash, short-term money market deposits and an intercompany loan with the Company's parent. There is no intention to change this methodology.

As consequence of the sale of the Company in 2024, the Company was no longer defined as a captive reinsurance company but was reclassified as a reinsurance company requiring additional share capital which was issued in June 2024.

### E.1 (b), (c) and (d) Own funds tier classification

Own Funds Item (£'000)	Value at 31 March 2025	Value at 31 March 2024
<b>Tier 1 unrestricted</b>	3,402	2,609
<b>Tier 1 restricted</b>	-	-
<b>Tier 2 basic</b>	-	-
<b>Tier 2 ancillary</b>	-	-
<b>Tier 3</b>	-	-
<b>Tier 3 ancillary</b>	-	-

# ASHBROOKE REINSURANCE (IRELAND) DAC

## E.1 (e) Material differences between financial statement and excess of assets over liabilities

The equity as shown in the Company's financial statements is £17k less than the excess of assets over liabilities as calculated for solvency purposes; this difference is due mainly to fact that the technical provisions in the Financial Statements are calculated on a more prudent basis than the Solvency II Technical Provisions.

Reconciliation (£'000)	31 March 2025	31 March 2024
Available Capital per Financial Statements	3,385	2,586
+/- tax adjustment	(2)	(3)
- Risk Margin	(1)	(1)
+ Prudence in Financial Statement reserves	50	50
+/- Discounting	1	1
- Solvency II Expense Provision	(32)	(24)
Total	3,402	2,609

## E.1 (f) Transitional arrangements

The Company has no own-fund items subject to the transitional arrangements referred to in Articles 308b (9) and 308b (10) of Directive 2009/138/EC.

## E.1 (g) Ancillary funds

The Company has no items of ancillary own funds.

## E.1 (h) Any item deducted

The Company has no items deducted from own funds.

## E.2 Minimum Capital Requirement and Solvency Capital Requirement

### E.2 (a) SCR & MCR

As at 31 March 2025

Solvency £'000	Capital requirement	Eligible capital	Solvency ratio
SCR	1,288	3,402	264.1%
MCR	3,258	3,402	104.4%

As at 31 March 2024

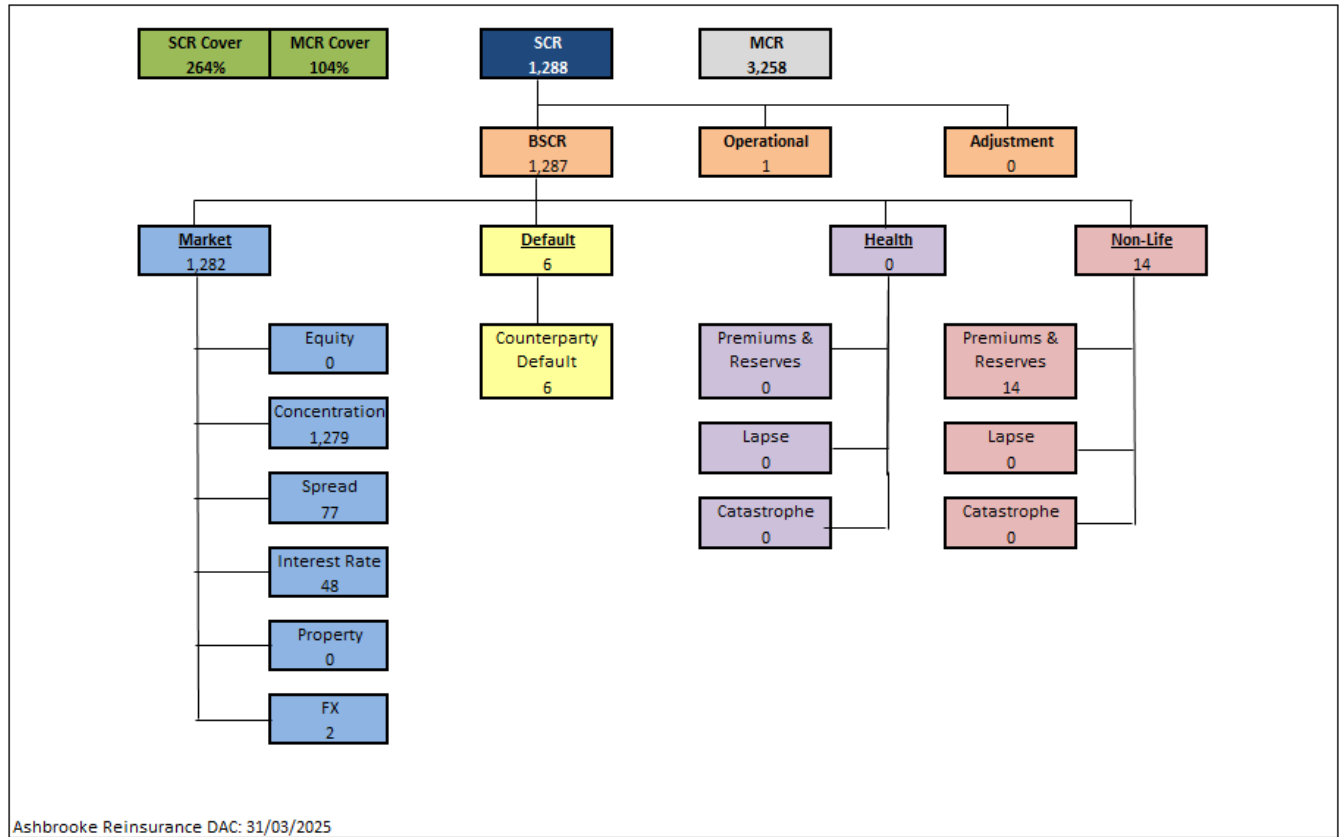
Solvency £'000	Capital requirement	Eligible capital	Solvency ratio
SCR	536	2,609	486.6%
MCR	3,335	2,609	78.2%

The SCR has increased due to the increased concentration risk with the addition of the intercompany loan in June 2024.

# ASHBROOKE REINSURANCE (IRELAND) DAC

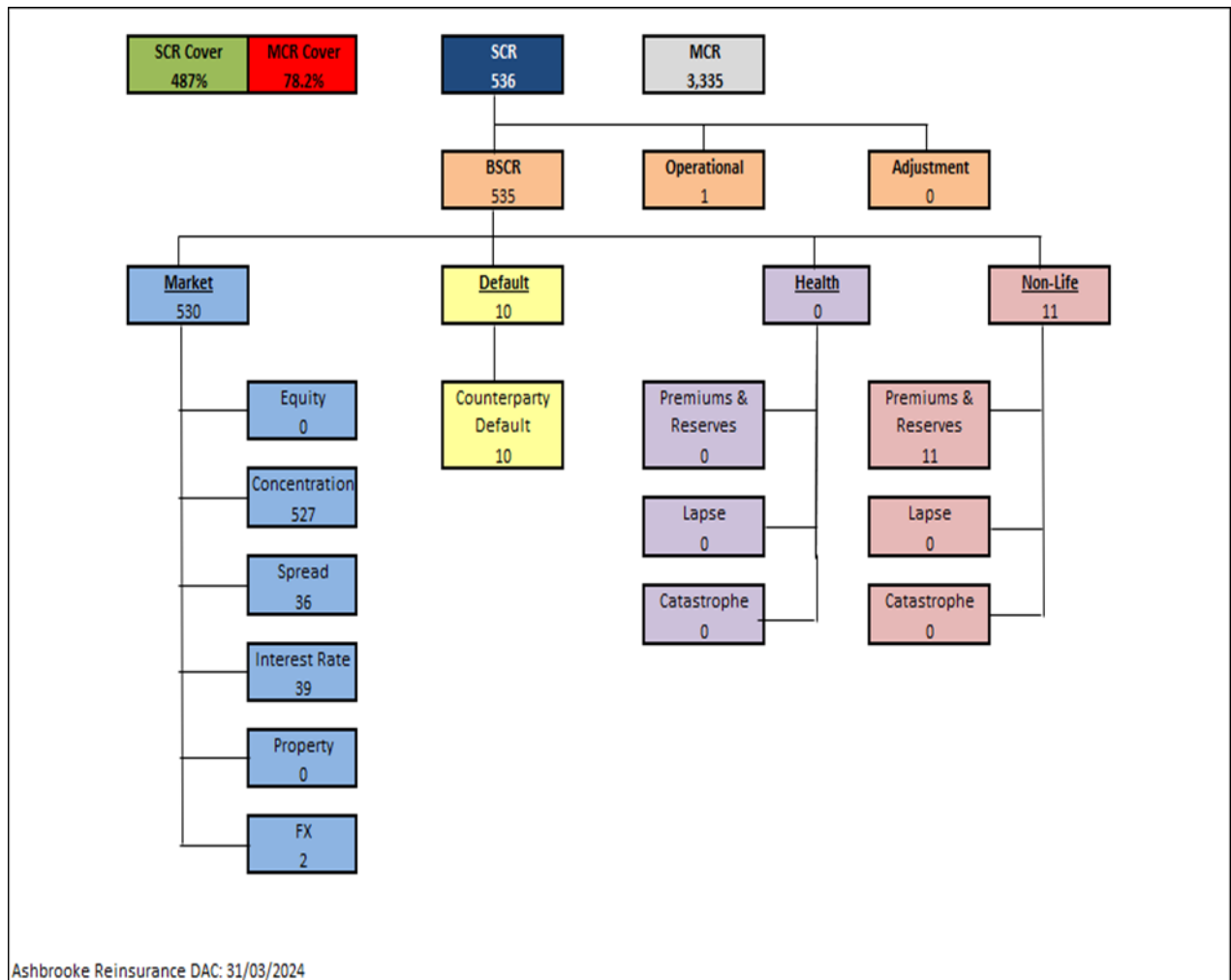
## E.2 (b) Solvency Capital Requirement

As at 31 March 2025



# ASHBROOKE REINSURANCE (IRELAND) DAC

As at 31 March 2024



# ASHBROOKE REINSURANCE (IRELAND) DAC

## E.2 (c) Simplified Calculation

The Company does not use simplified calculations for any risk modules or sub-modules of the Standard Formula.

## E.2 (d) Article 104 (7) of Directive 2009/138/EC

The Company does not use undertaking-specific parameters pursuant to Article 104 (7) of Directive 2009/138/EC.

## E.2 (e) Article 110 of Directive 2009/138/EC

The Company is not required to apply any undertaking-specific parameters in accordance with Article 110 of Directive 2009/138/EC and is not subject to any capital add-on.

## E.2 (f) Inputs used to calculate the MCR

The MCR as calculated using premium volume is as follows (£'000):

As at 31 March 2025

Line of Business	Net Technical Provisions	Net Premium Written	Parameters		MCR NL
			$\alpha$	$\beta$	
Motor Vehicle Liability	-	-	9%	9%	-
Fire & Other Damage to Property	-	-	9%	8%	-
General Liability	41	-	10%	13%	4
<b>Total</b>	<b>41</b>	<b>-</b>			<b>4</b>

As at 31 March 2024

Line of Business	Net Technical Provisions	Net Premium Written	Parameters		MCR NL
			$\alpha$	$\beta$	
Motor Vehicle Liability	-	-	9%	9%	-
Fire & Other Damage to Property	-	-	9%	8%	-
General Liability	34	-	10%	13%	3
<b>Total</b>	<b>34</b>	<b>-</b>			<b>3</b>

Since the figure of £4k is less than the absolute minimum MCR of £3.258M, this amount is taken as the MCR.

## E.3 Duration-based equity risk sub-module

The Company is not using the duration-based equity risk sub-module in the calculation of its SCR.

# ASHBROOKE REINSURANCE (IRELAND) DAC

## **E.4 Internal model**

An internal model is not used by the Company.

## **E.5 Compliance with the MCR and SCR**

There has been full compliance with Minimum Capital Requirement and the Solvency Capital Requirement.

## **E.6 Any Other Disclosures**

There is no other material information regarding the capital management of the Company.

# APPENDICES



**Annex I****S.02.01.02****Balance sheet****Assets**

Intangible assets

Deferred tax assets

Pension benefit surplus

Property, plant &amp; equipment held for own use

Investments (other than assets held for index-linked and unit-linked contracts)

Property (other than for own use)

Holdings in related undertakings, including participations

Equities

Equities - listed

Equities - unlisted

Bonds

Government Bonds

Corporate Bonds

Structured notes

Collateralised securities

Collective Investments Undertakings

Derivatives

Deposits other than cash equivalents

Other investments

Assets held for index-linked and unit-linked contracts

Loans and mortgages

Loans on policies

Loans and mortgages to individuals

Other loans and mortgages

Reinsurance recoverables from:

Non-life and health similar to non-life

Non-life excluding health

Health similar to non-life

Life and health similar to life, excluding health and index-linked and unit-linked

Health similar to life

Life excluding health and index-linked and unit-linked

Life index-linked and unit-linked

Deposits to cedants

Insurance and intermediaries receivables

Reinsurance receivables

Receivables (trade, not insurance)

Own shares (held directly)

Amounts due in respect of own fund items or initial fund called up but not yet paid in

Cash and cash equivalents

Any other assets, not elsewhere shown

**Total assets**

	Solvency II value
	C0010
<b>R0030</b>	
<b>R0040</b>	
<b>R0050</b>	
<b>R0060</b>	
<b>R0070</b>	2,587
<b>R0080</b>	
<b>R0090</b>	
<b>R0100</b>	
<b>R0110</b>	
<b>R0120</b>	
<b>R0130</b>	
<b>R0140</b>	
<b>R0150</b>	
<b>R0160</b>	
<b>R0170</b>	
<b>R0180</b>	
<b>R0190</b>	
<b>R0200</b>	2,587
<b>R0210</b>	
<b>R0220</b>	
<b>R0230</b>	
<b>R0240</b>	
<b>R0250</b>	
<b>R0260</b>	
<b>R0270</b>	
<b>R0280</b>	
<b>R0290</b>	
<b>R0300</b>	
<b>R0310</b>	
<b>R0320</b>	
<b>R0330</b>	
<b>R0340</b>	
<b>R0350</b>	
<b>R0360</b>	
<b>R0370</b>	
<b>R0380</b>	
<b>R0390</b>	
<b>R0400</b>	
<b>R0410</b>	123
<b>R0420</b>	11
<b>R0500</b>	2,722

**Annex I****S.02.01.02****Balance sheet****Liabilities**

Technical provisions – non-life

Technical provisions – non-life (excluding health)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - health (similar to non-life)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions - life (excluding index-linked and unit-linked)

Technical provisions - health (similar to life)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions – life (excluding health and index-linked and unit-linked)

Technical provisions calculated as a whole

Best Estimate

Risk margin

Technical provisions – index-linked and unit-linked

Technical provisions calculated as a whole

Best Estimate

Risk margin

Contingent liabilities

Provisions other than technical provisions

Pension benefit obligations

Deposits from reinsurers

Deferred tax liabilities

Derivatives

Debts owed to credit institutions

Financial liabilities other than debts owed to credit institutions

Insurance &amp; intermediaries payables

Reinsurance payables

Payables (trade, not insurance)

Subordinated liabilities

Subordinated liabilities not in Basic Own Funds

Subordinated liabilities in Basic Own Funds

Any other liabilities, not elsewhere shown

**Total liabilities****Excess of assets over liabilities**

	Solvency II value
	C0010
<b>R0510</b>	35
<b>R0520</b>	35
<b>R0530</b>	
<b>R0540</b>	34
<b>R0550</b>	1
<b>R0560</b>	
<b>R0570</b>	
<b>R0580</b>	
<b>R0590</b>	
<b>R0600</b>	
<b>R0610</b>	
<b>R0620</b>	
<b>R0630</b>	
<b>R0640</b>	
<b>R0650</b>	
<b>R0660</b>	
<b>R0670</b>	
<b>R0680</b>	
<b>R0690</b>	
<b>R0700</b>	
<b>R0710</b>	
<b>R0720</b>	
<b>R0740</b>	
<b>R0750</b>	
<b>R0760</b>	
<b>R0770</b>	
<b>R0780</b>	3
<b>R0790</b>	
<b>R0800</b>	
<b>R0810</b>	
<b>R0820</b>	0
<b>R0830</b>	
<b>R0840</b>	
<b>R0850</b>	
<b>R0860</b>	
<b>R0870</b>	
<b>R0880</b>	74
<b>R0900</b>	112
<b>R1000</b>	2,609

Annex I  
S.04.05.21  
Premiums, claims and expenses by country

Home country: Non-life insurance and reinsurance obligations

	Home Country	Top 5 countries: non-life				
		C0011	C0012	C0013	C0014	C0015
R0010		GB				
	C0010	C0020	C0021	C0022	C0023	C0024
Premiums written (gross)						
Gross Written Premium (direct)	R0020					
Gross Written Premium (proportional reinsurance)	R0021					
Gross Written Premium (non-proportional reinsurance)	R0022					
Premiums earned (gross)						
Gross Earned Premium (direct)	R0030					
Gross Earned Premium (proportional reinsurance)	R0031					
Gross Earned Premium (non-proportional reinsurance)	R0032					
Claims incurred (gross)						
Claims incurred (direct)	R0040					
Claims incurred (proportional reinsurance)	R0041	-90				
Claims incurred (non-proportional reinsurance)	R0042					
Expenses incurred (gross)						
Gross Expenses Incurred (direct)	R0050					
Gross Expenses Incurred (proportional reinsurance)	R0051	143				
Gross Expenses Incurred (non-proportional reinsurance)	R0052					

**Annex I**  
**S.05.01.02**  
**Premiums, claims and expenses by line of business**

[illegible]

Annex I  
S.17.01.02  
Non-life Technical Provisions

	Direct business and accepted proportional reinsurance						Total Non-Life obligation
	Medical expense insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	
	C0020	C0050	C0060	C0070	C0080	C0090	
<b>Technical provisions calculated as a whole</b>	R0010						
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050						
<b>Technical provisions calculated as a sum of BE and RM</b>							
<b>Best estimate</b>							
Premium provisions							
Gross	R0060						
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140						
Net Best Estimate of Premium Provisions	R0150						
<b>Claims provisions</b>							
Gross	R0160					34	34
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240						
Net Best Estimate of Claims Provisions	R0250					34	34
<b>Total Best estimate - gross</b>	R0260					34	34
<b>Total Best estimate - net</b>	R0270					34	34
<b>Risk margin</b>	R0280					1	1
<b>Technical provisions - total</b>							
Technical provisions - total	R0320					35	35
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330						
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340					35	35

Annex I  
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Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	Z0020	Underwriting year [UWY]
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Gross Claims Paid (non-cumulative)  
(absolute amount)

Development year												In Current year	Sum of years (cumulative)	
Year		1	2	3	4	5	6	7	8	9	10 & +			
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180	
Prior	R0100										0	R0100	0	
2015	R0160	15	52	38	83	112	0	1				R0160	301	
2016	R0170	91	31	12	7							R0170	142	
2017	R0180	81	27	21	19	45	2					R0180	195	
2018	R0190											R0190		
2019	R0200											R0200		
2020	R0210											R0210		
2021	R0220											R0220		
2022	R0230											R0230		
2023	R0240											R0240		
2024	R0250											R0250		
Total												R0260	0	638

Gross undiscounted Best Estimate Claims Provisions  
(absolute amount)

Development year												Year end (discounted data)		
Year		1	2	3	4	5	6	7	8	9	10 & +			
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	
Prior	R0100											0	R0100	0
2015	R0160			139	101	44							R0160	
2016	R0170		220	6	59	17							R0170	
2017	R0180	754	581	303	263	86	25	35					R0180	34
2018	R0190												R0190	
2019	R0200												R0200	
2020	R0210												R0210	
2021	R0220												R0220	
2022	R0230												R0230	
2023	R0240												R0240	
2024	R0250												R0250	
Total												R0260	34	

**Annex I**  
**S.23.01.01**  
**Own funds**

**Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35**

Ordinary share capital (gross of own shares)  
Share premium account related to ordinary share capital  
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings  
Subordinated mutual member accounts  
Surplus funds  
Preference shares  
Share premium account related to preference shares  
Reconciliation reserve  
Subordinated liabilities  
An amount equal to the value of net deferred tax assets  
Other own fund items approved by the supervisory authority as basic own funds not specified above

**Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds**

Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds

**Deductions**

Deductions for participations in financial and credit institutions

**Total basic own funds after deductions**

**Ancillary own funds**

Unpaid and uncalled ordinary share capital callable on demand  
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand  
Unpaid and uncalled preference shares callable on demand  
A legally binding commitment to subscribe and pay for subordinated liabilities on demand  
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC  
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC  
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC  
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC  
Other ancillary own funds

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
R0010	2,000	2,000			
R0030					
R0040					
R0050					
R0070					
R0090					
R0110					
R0130	609	609			
R0140					
R0160					
R0180					
R0220					
R0230					
R0290	2,609	2,609			
R0300					
R0310					
R0320					
R0330					
R0340					
R0350					
R0360					
R0370					
R0390					

**Total ancillary own funds**

**Available and eligible own funds**

Total available own funds to meet the SCR  
Total available own funds to meet the MCR  
Total eligible own funds to meet the SCR  
Total eligible own funds to meet the MCR

**SCR**

**MCR**

**Ratio of Eligible own funds to SCR**

**Ratio of Eligible own funds to MCR**

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
R0400					
R0500	2,609	2,609			
R0510	2,609	2,609			
R0540	2,609	2,609			
R0550	2,609	2,609			
R0580	536				
R0600	3,335				
R0620	486.56%				
R0640	78.25%				

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Own funds

	C0060
Reconciliation reserve	
Excess of assets over liabilities	R07002,609
Own shares (held directly and indirectly)	R0710
Foreseeable dividends, distributions and charges	R0720
Other basic own fund items	R07302,000
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced	R0740
Reconciliation reserve	R0760609
Expected profits	
Expected profits included in future premiums (EPIFP) - Life business	R0770
Expected profits included in future premiums (EPIFP) - Non-life business	R0780
Total Expected profits included in future premiums (EPIFP)	R0790



## Annex I

### S.25.01.21

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

Market risk  
Counterparty default risk  
Life underwriting risk  
Health underwriting risk  
Non-life underwriting risk  
Diversification  
Intangible asset risk

#### Basic Solvency Capital Requirement

#### Calculation of Solvency Capital Requirement

Operational risk

Loss-absorbing capacity of technical provisions

Loss-absorbing capacity of deferred taxes

Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC

#### Solvency capital requirement excluding capital add-on

Capital add-on already set

of which, capital add-ons already set - Article 37 (1) Type a

of which, capital add-ons already set - Article 37 (1) Type b

of which, capital add-ons already set - Article 37 (1) Type c

of which, capital add-ons already set - Article 37 (1) Type d

#### Solvency capital requirement

#### Other information on SCR

Capital requirement for duration-based equity risk sub-module

Total amount of Notional Solvency Capital Requirement for remaining part

Total amount of Notional Solvency Capital Requirements for ring fenced funds

Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios

Diversification effects due to RFF nSCR aggregation for article 304

#### Approach to tax rate

Approach based on average tax rate

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

LAC DT

LAC DT justified by reversion of deferred tax liabilities

LAC DT justified by reference to probable future taxable economic profit

LAC DT justified by carry back, current year

LAC DT justified by carry back, future years

Maximum LAC DT

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
R0010	530		
R0020	10		
R0030			
R0040			
R0050	11		
R0060	-15		
R0070			
R0100	535		

	C0100
R0130	1
R0140	
R0150	
R0160	
R0200	536
R0210	
R0211	
R0212	
R0213	
R0214	
R0220	536
R0400	
R0410	
R0420	
R0430	
R0440	

	Yes/No
	C0109
R0590	3 - Not applicable as LAC DT is not used (in this case R0600 to R0690 are not applicable)

	LAC DT
	C0130
R0640	
R0650	
R0660	
R0670	
R0680	
R0690	

# Annex I

## S.28.01.01

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

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

MCR <sub>NL</sub> Result	MCR components	
	R0010	C0010
		3
	Background information	
	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
	C0020	C0030
Medical expense insurance and proportional reinsurance	R0020	
Income protection insurance and proportional reinsurance	R0030	
Workers' compensation insurance and proportional reinsurance	R0040	
Motor vehicle liability insurance and proportional reinsurance	R0050	
Other motor insurance and proportional reinsurance	R0060	
Marine, aviation and transport insurance and proportional reinsurance	R0070	
Fire and other damage to property insurance and proportional reinsurance	R0080	
General liability insurance and proportional reinsurance	R0090	34
Credit and suretyship insurance and proportional reinsurance	R0100	
Legal expenses insurance and proportional reinsurance	R0110	
Assistance and proportional reinsurance	R0120	
Miscellaneous financial loss insurance and proportional reinsurance	R0130	
Non-proportional health reinsurance	R0140	
Non-proportional casualty reinsurance	R0150	
Non-proportional marine, aviation and transport reinsurance	R0160	
Non-proportional property reinsurance	R0170	

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

MCR <sub>L</sub> Result	C0040
	R0200

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

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

#### Overall MCR calculation

	C0070
Linear MCR	R0300
SCR	R0310
MCR cap	R0320
MCR floor	R0330
Combined MCR	R0340
Absolute floor of the MCR	R0350
Minimum Capital Requirement	R0400