Calpe Insurance Company Limited

Solvency and Financial Condition Report

As at 31 December 2018

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About this document

This document is the Solvency and Financial Condition Report ("SFCR") for Calpe Insurance Company Limited ("Calpe") as at 31 December 2018.

This SFCR covers Calpe on a solo basis.

Calpe's functional and presentational currency is pounds sterling ("GBP").

Directors' statement

We acknowledge our responsibility for preparing the SFCR in all material respects in accordance with the Gibraltar Financial Services Commission ("GFSC") Rules and the Solvency II Regulations.

We are satisfied that:

- throughout the financial year in question, Calpe has complied in all material respects with the requirements of the GFSC Rules and the Solvency II Regulations as applicable to Calpe; and
- it is reasonable to believe that, at the date of publication of this SFCR, the insurer has continued so to comply subsequently and will continue so to comply in future.

By order of the Board on 17 April 2019.

Paul Cole
Director

Douglas Murray
Director

Executive summary

Calpe is a private limited company headquartered in Gibraltar which is a wholly owned subsidiary of Transatlantic Reinsurance Company ("TRC"), a reinsurance company domiciled in New York, whose ultimate parent is Alleghany Corporation ("Alleghany"). Calpe is licensed by the Gibraltar Financial Services Commission. It commenced underwriting in November 2010, and provides the TransRe Group with a platform to write direct Insurance business in Europe. Calpe's primary focus has been on writing United Kingdom ("UK") and the Republic of Ireland motor business on a co-insurance basis and in support of MGAs.

Business and performance

Calpe delivered its strongest performance to date closing 2018 with a loss ratio of 75.6% (2017 – 81.2%) which delivered a pre-tax operating profit of £1.66m versus £1.58m in 2017. In contrast to the market, Calpe's niche portfolio saw rate increases continue through 2018, though our Gross Written Premium (GWP) was down 10% over 2017.

Calpe, in addition to motor classes, holds permission to write General Liability and Property and Assistance classes of business. The plan in recent years has always been to diversify the portfolio, though not at the expense of diluting margin or profit. During 2018, the company was able to secure an involvement with a niche casualty Managing General Agent ("MGA"), writing UK and Irish Employers Liability and Public Liability.

In the fourth quarter of 2018, A.M. Best reaffirmed the A+ group rating for Calpe.

Calpe continues to benefit from the 80% Quota Share treaty that it places with TransRe London Limited.

After months of debate, December 2018 saw the Civil Liability Bill eventually being given Royal Assent. The market now eagerly awaits the first review of the discount rate (due 3rd quarter 2019), and the whiplash reforms (implementation due in 2020). The FCA has been charged with ensuring that any savings will be passed on to Policyholders. However, any savings may well get swallowed by the rising costs of property damage: with increased technology built into cars, the costs of repairs have risen significantly over the last two years.

System of Governance

Calpe has an established governance framework and internal control system. The governance structure enables the Board to discharge its oversight responsibilities, helping to ensure Calpe meets its strategic objectives while managing risks within its stated risk appetite.

Calpe's Board maintains ultimate responsibility for oversight of Calpe. There are three sub-committees reporting up into the Calpe Board. The Board and committees operate under the guidance of formal terms of reference which are agreed by the Board.

In addition, Calpe separately identifies key functions (Risk, Compliance, Internal Audit, and Actuarial), all of which have their own key function holder who is responsible for reporting up into the Board or Board sub-committees. The members of the Board, along with the key function holders and approved persons, are subject to fit and proper assessments on an ongoing basis.

Risk profile

There is a strong risk management culture within Calpe to manage the key risks to the business. Calpe's ERM framework is supported by a comprehensive set of risk policies and guidelines and processes, procedures and management information. The framework is aligned with the regulatory requirements under Solvency II as adopted by the GFSC. An integral part of Calpe's framework is its Own Risk and Solvency Assessment ("ORSA") which provides management with a key tool to assess and evaluate the risks it faces. These are measured against capital ensuring that Calpe meets its strategic and business objectives. An ORSA report is prepared at least annually.

To assist it in achieving its risk management objectives, Calpe utilises the Internal Audit function to provide independent and objective analysis and assurance over its operations. Oversight and measurement of the Company's performance includes extensive involvement of the Actuarial function.

In keeping with its risk appetite and tolerances, Calpe continues to purchase excess of loss reinsurance to protect its portfolio. Following the Ogden ruling in March of 2017, the January 2018 renewals experienced the same rating adjustments. In order to protect and maintain margins, original rates had to be increased; though, in anticipation, the market had been increasing rates in the second half of 2017.

The majority of Calpe's policyholders are in the UK and we do not expect a significant impact from the UK's decision to leave the European Union.

Valuation for Solvency II purposes

An analysis of the differences between the valuation of assets and liabilities under Solvency II in comparison to IFRS is provided in Sections D1 and D3 below. These sections provide a background to the methods adopted under Solvency II, including the required inputs and any judgements or assumptions made.

Technical provisions are the amount of capital Calpe needs to hold in reserve for claims and premiums net of commissions and other expenses for all contractually obliged policies. This is equivalent to the current amount an insurer would have to pay for an immediate transfer of its obligations to another insurer. Technical provisions are made up of the best estimate liabilities ("BEL") and a risk margin.

BELs are the probability weighted average of future cash flows, discounted back to the relevant balance sheet date using risk free discount rates.

The risk margin represents an allowance for the cost of capital necessary to support the policies to which Calpe is obligated at the valuation date.

Calpe uses its IFRS insurance liabilities as the starting point for determining the Solvency II technical provisions. Adjustments are made to move from the IFRS basis to the Solvency II basis. These adjustments are detailed within Section D2.

Capital management

Under Solvency II the own funds of an insurance entity are placed into Tiers 1, 2 or 3 based on their ability to absorb losses, Tier 1 being the most able to do so.

Below is a summary of the own funds held by Calpe and a comparison to Calpe's regulatory capital requirements (the amount of capital the firm is required to hold).

Figure 1: Own funds by tier

Tier	Instrument	At 31 December (£'000s)	
		2018	2017
Tier 1	Ordinary paid up share capital	30	30
	Share premium related to ordinary share capital	29,970	29,970
	Reconciliation reserve	1,283	(254)
Tier 2	N/A		
Total own funds to cover MCR		**31,283**	**29,746**
Tier 3	Net deferred tax asset	264	309
Total own funds to cover SCR		**31,547**	**30,055**

A breakdown of the reconciliation reserve is included in Section E1.

Figure 2: Capital requirements

	At 31 December (£'000s)	
	2018	2017
Minimum capital requirement	5,713	6,498
Solvency capital requirement	22,854	25,991

Overall Calpe held 138% of its SCR capital requirements at 31 December 2018 (116% at 31 December 2017). The company's SCR decreased by £3.1 million, principally due to a reduction in the capital charge for premium and reserve risk as a result of lower estimates in gross premium and the increased quota share cession from 50% to 80% effective 1st January 2017.

A. Business and performance

A.1 Business

Company information

Calpe Insurance Company Limited:	PO Box 1338 First Floor Grand Ocean Plaza Ocean Village Gibraltar Company number: 104429 Legal Entity Identifier: 2138004X13159LETLH50
External auditors:	EY Regal House Queensway GX111AA Gibraltar
Regulator	Gibraltar Financial Services Commission PO Box 940 Suite 3, Ground Floor Atlantic Suites Europort Avenue Gibraltar

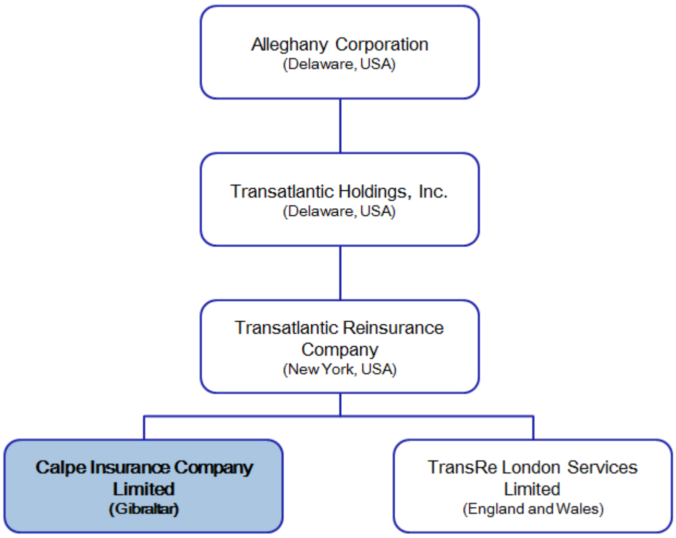
Calpe is a private limited company, limited by shares, with its registered office in Gibraltar. It is a wholly owned subsidiary of TRC, which is a reinsurance company domiciled in New York, USA. Calpe provides the TransRe group ("TransRe") with a platform to write direct insurance business in Europe. Calpe is headquartered in Gibraltar and is licensed by the Gibraltar Financial Services Commission. Calpe commenced underwriting on 1 November 2010.

Calpe's ultimate parent undertaking is Alleghany, a company incorporated in Delaware, USA. Alleghany is listed on the New York Stock Exchange (NYSE: Y). Further information on Alleghany is available at www.alleghany.com.

In addition to TRC and Alleghany, Transatlantic Holdings, Inc., incorporated in Delaware, USA, is an indirect parent and holder of a qualifying holding in Calpe.

Other than TRC, TRH and Alleghany, there are no other holders of qualifying holdings in Calpe. Calpe has no related undertakings as defined in Article 212 of the Solvency II Directive. A simplified group structure chart is shown below. The Alleghany group is subject to group supervision by the New Hampshire Department of Insurance, NH, USA.

Figure 3: Organisational structure chart



(All subsidiaries are 100% owned and controlled.)

Calpe sells insurance both as a co-insurer in support of other insurers and as either a sole insurer or co-participant through partnerships with managing general agents ("MGAs"). Since inception, the focus of the portfolio has been the UK & Irish motor market, with 100% of income in motor classes. Calpe underwrites a mixed portfolio of risks across the motor market from personal lines to commercial risks, with the intention of maintaining a diverse portfolio of niche risks, avoiding over-dependence on any one sector. During 2018, Calpe was able to expand its portfolio further with the addition of a new MGA that writes Employers' Liability and Public Liability business in the United Kingdom and Republic of Ireland.

Market commentary

The positive rating environment for motor business continued in 2018, though not to the same extent as experienced through 2017, and there was evidence of some decreases at year end. The uplifts applied were necessary to preserve margin in light of the increasing cost of reinsurance and annual claims inflation. Whilst claims frequency remained stable through 2018, a number of Calpe's partners advised that they were experiencing inflation in Third Party Property Damage costs. Offsetting this, however, were increased success rates in Fraud detection and reducing Credit Hire costs. Companies also continue to invest in data enrichment tools to help improve risk selection.

Strategy and portfolio

Figure 4: Solvency II line of business (gross written premium as at 31 December 2018)

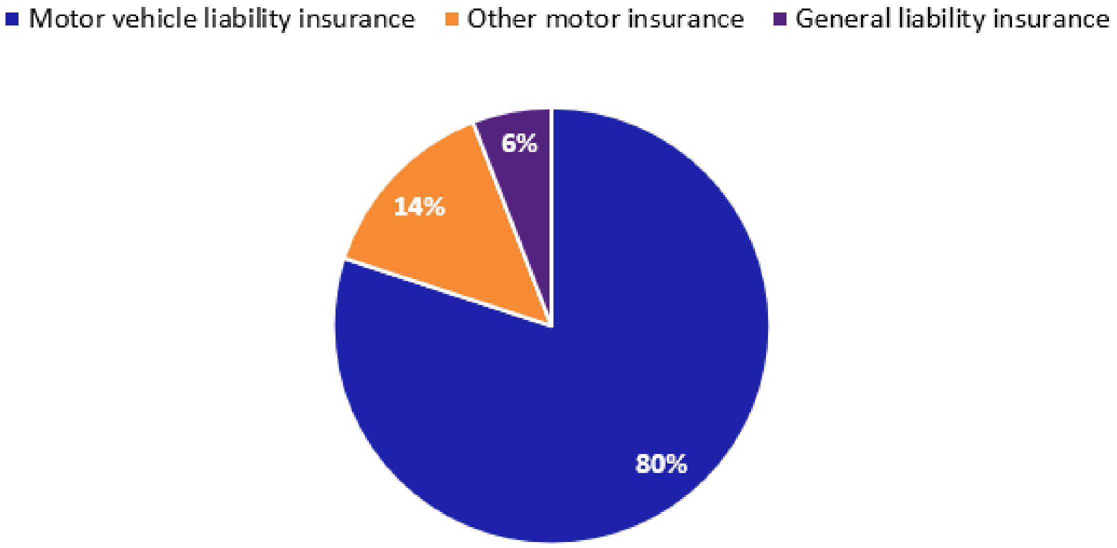
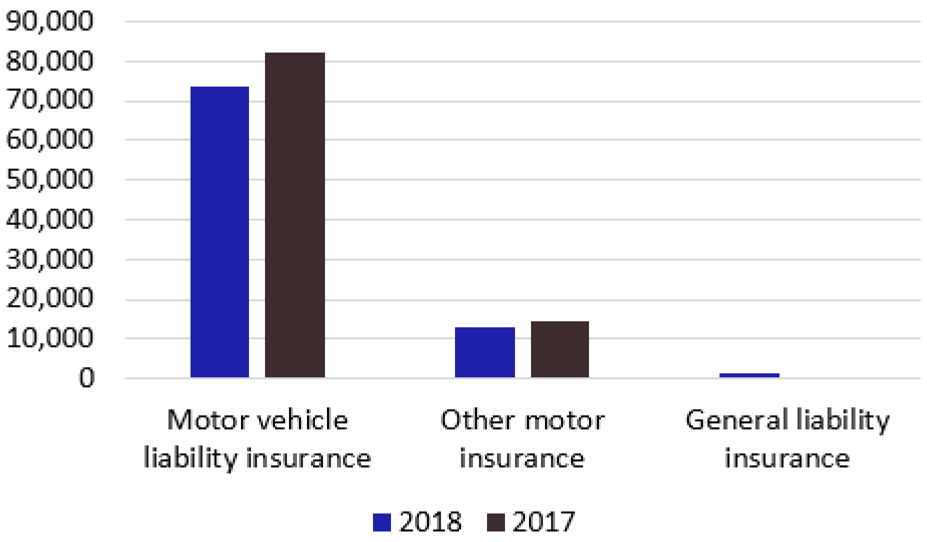


Figure 5: Gross earned premium by line of business as at 31 December 2018 (£'000s)



As part of Calpe's strategy, the Board has been seeking to diversify the book of business into other licence classes. Calpe currently holds licence classes to write Motor Vehicle and Motor Vehicle Liability, Fire and Natural Forces, Damage to Property, General liability and Assistance. Up until now the absence of a rating has hindered expansion.

With the company now holding a strong rating, during 2018 Calpe was successful in negotiating terms to secure a new Casualty (Non-Motor) programme, which covers an Employers and Public Liability portfolio of risks. This portfolio has no correlation or aggregation with our existing portfolio. The portfolio is, however, still dominated by UK motor, representing 80% of the portfolio.

Calpe will continue to review the potential to further expand its class base, but not at the expense of achieving its required margin.

TRC, together with certain of its subsidiaries including Calpe, is rated A+ by A.M. Best; this was reaffirmed in December 2018.

A.2 Underwriting performance

The continued positive rating environment coupled with favourable run-off development is reflected in the improved profitability of the portfolio, with a net underwriting profit (excluding investment returns) of £824k for 2018 (2017: loss of £201k). For more details on Calpe's underwriting performance, please refer to QRT S.05.01 in Appendix 2.

In the pursuit of profitability, Calpe continues to focus on underwriting quality, not premium volume. In contrast to 2017 and despite further rate increases, 2018 gross written premium reduced by 10% (£86.5m in 2018 vs £96.5m in 2017). Calpe lost one major renewal, which was offset by a new programme, though a number of our clients reported shortfalls in income against budgets. Increased excess of loss costs also impacted net premiums.

Underwriting performance by line of business

Calpe's business falls into four of the Solvency II lines of business. The table below summarises the performance of those lines of business on a gross and net basis. Figures are presented on both a gross assumed basis and on a net basis after all outwards reinsurance, including the TRL Quota Share described in Section B1.

Figure 6a: Underwriting performance by Solvency II line of business 2018 - gross

Gross (£'000s)	Motor vehicle liability insurance	Other motor insurance	General liability insurance	Annuities	Total
Premiums written	69,239	12,219	5,072	0	86,530
Premiums earned	73,592	12,987	1,465	0	88,044
Claims incurred	(55,575)	(9,807)	(843)	(337)	(66,562)
Expenses	(14,785)	(2,609)	(541)	0	(17,935)
Underwriting profit/(loss)	3,232	571	81	(337)	3,547
Loss ratio	76%	76%	58%	0%	76%

Figure 6b: Underwriting performance by Solvency II line of business 2017 - gross

Gross (£'000s)	Motor vehicle liability insurance	Other motor insurance	Total
Premiums written	82,057	14,481	96,538
Premiums earned	82,327	14,528	96,856
Claims incurred	(66,876)	(11,802)	(78,678)
Expenses	(15,274)	(2,695)	(17,969)
Underwriting profit/(loss)	177	31	208
Loss ratio	81%	81%	81%

Figure 6c: Underwriting performance by Solvency II line of business 2018 - net

Net (£'000s)	Motor vehicle liability insurance	Other motor insurance	General liability insurance	Annuities	Total
Premiums written	11,605	2,048	900	0	14,553
Premiums earned	13,775	2,431	261	0	16,467
Claims incurred	(9,600)	(1,694)	(144)	(93)	(11,531)
Expenses	(3,400)	(600)	(111)	0	(4,111)
Underwriting profit/(loss)	775	137	6	(93)	825
Loss ratio	70%	70%	55%	0%	70%

Figure 6d: Underwriting performance by Solvency II line of business 2017 - net

Net (£'000s)	Motor vehicle liability insurance	Other motor insurance	Total
Premiums written	19,575	3,455	23,030
Premiums earned	29,232	5,159	34,391
Claims incurred	(23,157)	(4,087)	(27,244)
Expenses	(6,246)	(1,102)	(7,348)
Underwriting profit/(loss)	(171)	(30)	(201)
Loss ratio	79%	79%	79%

For details and the breakdown of premiums, claims and expenses by geographical spread please refer to QRT S.05.02.01 in Appendix 2.

A.3 Investment performance

Net investment income

Net investment income, recognised in the statement of profit or loss and other comprehensive income, includes investment income (comprising interest, dividends and the amortisation of any discount or premium on available-for-sale debt securities and rents receivable for the period), realised gains and losses and movements in unrealised gains and losses on financial assets held at fair value through profit or loss, net of interest payable, investment expenses and impairment losses on financial assets.

Interest income is recognised as accrued based on the effective interest method. Dividend income is recognised as Calpe's right to those dividends becomes unconditional. Acquisition costs related to the purchase of bonds are capitalised and expensed over duration of the investment.

Financial investments

Calpe's investment portfolio is made up exclusively of fixed income securities. Over the year the investment portfolio has made a total net loss of £25k (2017: net income of £1,123k). The net loss arose due to capital losses (both realised and unrealised) exceeding the interest income. During the year there were no material changes to the asset allocation within the investment portfolio.

Figure 7a: Net investment return 2018

	Year to 31 December 2018			31 December 2018
Asset Category (£'000s)	Income	Gains / (losses)	Net income/gain or (loss)	Total SII Value
Corporate bonds	620	(751)	(131)	35,046
Government bonds	170	(64)	106	18,832
Cash and deposits	0	0	0	4,258
Total	**790**	**(815)**	**(25)**	**58,136**

Figure 7b: Net investment return 2017

	Year to 31 December 2017			31 December 2017
Asset Category (£'000s)	Income	Gains / Losses	Net income/gain or (loss)	Total SII Value
Corporate Bonds	334	(392)	(57)	36,568
Government Bonds	525	649	1,174	19,894
Cash and deposits	6	0	6	8,270
Total	**865**	**257**	**1,123**	**64,732**

The above investment income excludes investment management fees. Such fees are charged based on the assets under management during the period. Total fees charged in 2018 were £46.4k (2017: £58.4k).

Securitisations

Calpe's asset portfolio does not include any securitised investments.

A.4 Performance of other activities

Calpe does not receive any material income other than from its underwriting and investment activities. Calpe has no financial or operating lease arrangements.

Calpe's reporting and presentational currency is GBP. The operating results and financial position of each non-GBP ledger are translated into GBP at the appropriate prevailing exchange rate. All resulting exchange differences are recognised in the statement of profit and loss and other comprehensive income.

A.5 Any other information

Brexit

A referendum on the UK's membership of the EU was held on 23 June 2016 and resulted in a majority of 52 percent in favour of the withdrawal of the UK from the EU ("Brexit").

The current negotiations connected with the UK's departure from the EU provides a number of socio-political uncertainties, particularly from a regulatory perspective. The principal risks of Brexit to Calpe are a possible loss of access EU insurance markets in the future, the risk of a customs and immigration barrier being established between Spain and Gibraltar and the devaluation of Sterling.

As the majority of Calpe's business is with policyholders in the UK, Calpe does not anticipate that the possible loss of access to the single market will have a significant impact on its business and performance. Calpe will cease to attach new risks in Ireland with effect from the Brexit date, but will provide service continuity with respect to all live contracts with policyholders and all valid claims under live and expired contracts under the Irish temporary run-off regime. Calpe remains in dialogue with the appropriate regulatory authorities in respect of this matter.

Calpe continues to monitor the possible impact of a customs and immigration barrier between Spain and Gibraltar.

The currency risk associated with Brexit is managed by the capitalisation of Calpe being held in Sterling which reflects the currency of the majority of Calpe's business. Insurance liabilities in other currencies (principally the Euro) are matched with assets in the same currency. However, the devaluation of Sterling has adversely impacted repair costs where motor vehicle replacement parts are sourced from the continent.

One other consequence of Brexit will be the requirement for insurers to issue green cards to policyholders intending to travel within the EEA. Calpe is working closely with its business partners to ensure the appropriate measures are in place to address this change. Similarly, the company continues to monitor the position in respect of the Protections of Visitors under the 4th Insurance Directive.

Ogden rate

On 27 February 2017 the Lord Chancellor in the UK significantly reduced the personal injury discount rate (known as the Ogden rate) from 2.5% to minus 0.75%. The new rate was effective from 20 March 2017. As a result of this event the earnings of both insurers and reinsurers of UK motor business were hit by reserve strengthening and they sought to increase rates; the extent of increases achieved varied depending on the nature of portfolio and structure of the reinsurances that are in place.

In December 2018 the Civil Liability Bill obtained Royal Assent and on 22 January 2019 the Government Actuary Department published a technical memorandum in respect of setting the discount rate. It is expected the new rate will be published in Q3 2019 and widely anticipated that the rate will be in the region of 0-0.5%. No allowance for this possible change has been allowed for in this SFCR. Notwithstanding other inflationary elements, this should result in a reduction in gross loss reserves across the industry, in particular on large claims (excess of £500,000). Insurers would look for this saving to be reflected in their reinsurance pricing where ultimately the largest impact of the savings will be felt. No allowance for this anticipated change has been made within this SFCR.

Calpe does not consider there is any other material information to disclose on its business and performance.

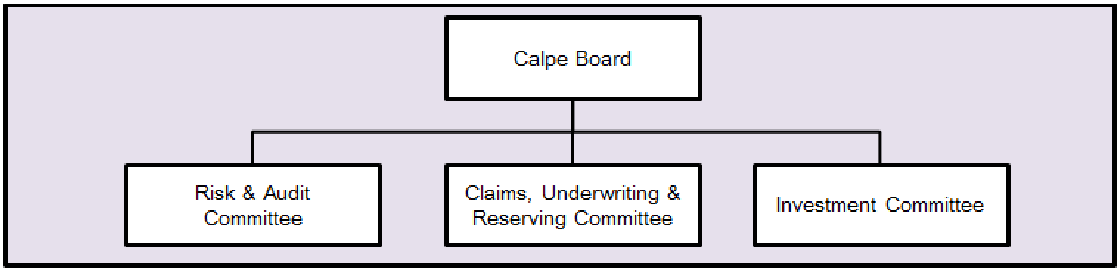
B. System of Governance

B.1 General information on the system of governance

Calpe's governance structure reflects its membership of a large international group of companies, while ensuring that it maintains robust local governance arrangements.

The structure of Calpe's key governance bodies is shown in Figure 8.

Figure 8: Governance oversight



Calpe's Board maintains ultimate responsibility for overseeing the running of Calpe. Its responsibilities include:

- setting Calpe's business strategy and monitoring performance against its business plan;
- setting Calpe's risk appetite whilst being mindful of TransRe's risk appetites and tolerances;
- maintaining oversight of Calpe's compliance with relevant laws and regulation; and
- reviewing and maintaining the effectiveness of the corporate governance framework and Calpe's internal control framework.

The following individuals were members of Calpe's Board and members of the sub committees of the Board as at 31 December 2018:

Figure 9: Calpe's Board

Board Member	Role	Committees
Peter Abbott	Non-executive chairman	All
Paul Tysoe	Non-executive director	All #
Douglas Murray	Executive director	All §
Geoffrey Peach	Executive director	All
Paul Cole	Executive director	All +
Robert Snow	Executive director	All

Chair of the Risk & Audit Committee

+ Chair of the Investment Committee

§ Chair of the Claims, Underwriting & Reserving Committee

There were no changes to the composition of the Board during the year.

As shown in figure 8 above, Calpe's Board operates three sub-committees.

Risk & Audit Committee

The Risk & Audit Committee's responsibilities include:

Risk

- providing oversight and challenge to the effectiveness of Calpe's Risk Management function, Enterprise Risk Management ("ERM") framework and risk management culture, including the appetites and tolerances and progress embedding ERM in Calpe in alignment with TransRe's overall ERM and risk governance framework;
- monitoring the effectiveness of Calpe's risk management and internal control systems, including financial, operational and compliance controls, and reporting any recommendations to the Board; and
- providing oversight and challenge to the effectiveness of Calpe's Compliance Function, approving the Compliance Monitoring [and Training] Plan and overseeing progress against it.

Audit

- monitoring and reviewing the effectiveness of Calpe's Internal Audit function;
- approving the annual Internal Audit Plan and overseeing progress against it;
- reviewing Internal Audit reports, findings and monitor the status of actions and recommendations;
- monitoring the integrity of the financial statements of Calpe and any formal announcements relating to Calpe's financial performance;
- reviewing Calpe's internal financial controls;
- making recommendations to the Board in relation to the appointment, re-appointment and removal of the external auditor and approving the remuneration and terms of engagement of the external auditor;
- approving the external audit plan and overseeing progress against it; and
- reviewing and monitoring the external auditor's independence and objectivity and the effectiveness of the audit process.

The Risk & Audit Committee meets at least four times per year.

Investment Committee

The Investment Committee's responsibilities include:

- reviewing and making recommendations to the Board in respect of Calpe's investment strategy and policy in a manner consistent with the prudent person principle;
- receiving and reviewing summary reports on Calpe's investment portfolio, investment activity and investment practices;
- considering investment performance and providing appropriate challenge and comment;
- maintaining oversight of compliance by management with applicable legal and regulatory requirements with respect to investments and the investment policies and decisions of Calpe's management; and
- considering reports in respect of investment risk management, liquidity management and credit management.

The Investment Committee meets at least four times per year.

Claims, Underwriting & Reserving Committee

The Claims, Underwriting & Reserving Committee's responsibilities include:

Underwriting

- considering new products, MGA and co-insurance opportunities and lines of business;
- establishing, recommending and maintaining oversight of the underwriting strategy (including reinsurance purchasing) and business planning activities;
- recommending underwriting risk appetites and tolerances and reinsurance requirements for Calpe, ensuring they are consistent with TransRe's group;

- reviewing underwriting performance, including pricing, claims trends, insurance buying patterns, competitor analysis, and conversion and lapse rates; and
- reviewing key aggregate management issues and development.

Claims

- reviewing and monitoring claims activity and claims trends;
- approving delegated claims handling authorities; and
- assisting the Board in setting the claims philosophy and claims development policy to be adopted.

Reserving

- establishing, recommending and maintaining oversight of the reserving strategy;
- maintaining oversight on the reserving policy to ensure it is fit for purpose;
- considering the adequacy of previously set reserves against actual outcomes and investigating where material differences are identified; and
- recommending a level of reserves for consideration by the Board.

The Claims, Underwriting & Reserving Committee meets at least four times per year.

The Board and its sub-committees maintain terms of reference that are reviewed at least annually.

Each of the sub-committees reports to the Board through their respective Chairs as a standing item on the Board's agenda.

Key functions

Calpe has identified the following functions as key functions:

Figure 10: Key functions and key function holders

Key function	Holder
Risk Management System	Douglas Murray
Compliance	Colin Peters
Internal Audit	Paul Cole
Actuarial	Robert Snow

Each of the key functions within Calpe is operationally independent of each other, with its own key function holder. Each key function reviews its resource needs on at least an annual basis and the key function holder is responsible for ensuring the key function is adequately resourced.

All key functions report to the Board or a sub-committee of the Board. Further information on the authority, resources and operational independence of the key functions is included in Sections B3 (Risk Management function), B4 (Compliance function), B5 (Internal Audit function) and B6 (Actuarial function).

There were no material changes in Calpe's governance structure in the 12 months ended 31 December 2018.

Remuneration policies and practices

Calpe does not employ any direct employees and consequently does not maintain a remuneration policy. However, Calpe receives a re-charge from TransRe London Services Limited ("TRLS"), a subsidiary of TRC in the UK, for services provided by employees of TRLS.

The remuneration policy of TransRe London Limited ("TRL"), a subsidiary of TRC in the UK, which has been adopted by TRLS, is described in TRL's SFCR.

Fees paid to non-executive directors are calculated on a flat rate basis and there is no variable component. Fees are reviewed periodically to ensure Calpe continues to attract and retain individuals of the appropriate skills and experience.

Material transactions with shareholders

Other than the outsourcing arrangements described in Section B7 and the TRC Guarantee described below, Calpe does not have any material transactions with the shareholders, members of the management body or those who can exert significant influence over the business.

Amounts paid to connected companies are reviewed on an annual basis as part of a group-wide transfer pricing exercise and the charges are reviewed and challenged by the Calpe Board. Additionally, these recharges are subject to regulatory approval from the GFSC.

Calpe has a variable whole account quota share reinsurance agreement with TRL (as reinsurer) (the "TRL Quota Share"), under which the proportion ceded can be varied by Calpe between 50% and 80%.

TRC has entered into a Capital Support Guarantee Agreement (the "TRC Guarantee") in favour of Calpe. Under the TRC Guarantee, TRC agrees to maintain Calpe's regulatory capital in an amount not less than 100% of Calpe's Solvency Capital Requirement.

Calpe has assessed the nature, scale of complexity of its business against its governance structure and considers its system of governance to be adequate.

B.2 Fit and proper requirements

The members of Calpe's Board collectively possess appropriate qualification, experience and knowledge about at least:

- insurance and financial markets;
- business strategy and business model;
- system of governance;
- financial and actuarial analysis; and
- regulatory framework and requirements.

Persons subject to assessment

Calpe ensures that Board members and key function holders are at all times fit and proper persons. Calpe does not draw a distinction between these categories when carrying out its own assessment of a person's fitness and propriety.

Timing of assessment

Calpe assesses fit and proper requirements on an ongoing basis, with the Directors subject to an annual assessment. On an ongoing basis, all individuals are required to ensure that their skills and knowledge are kept up-to-date and to confirm this annually. Calpe's directors and managers (and all TransRe employees) are also expected to abide by the group's Code of Business Conduct and Ethics, which sets out standards of ethics and behaviours.

Nature of assessment

In deciding whether a person is fit and proper, Calpe must be satisfied that the person:

- has the personal characteristics (including being of good repute and integrity);
- possesses the level of competence, knowledge and experience;
- has the qualifications; and
- has undergone or is undergoing all training required to enable that person to perform his or her function effectively and in accordance with any relevant regulatory requirements and to enable sound and prudent management of Calpe.

Any breaches of the fit and proper requirements are internally reported to the Board and the Risk & Audit Committee. Calpe's Compliance Officer is responsible for notifying the relevant regulator(s) of the change in circumstances and any remedial action that is being undertaken by Calpe.

Training and competency

Calpe subscribes to TransRe's training and competency ethos, which is designed to promote learning and development within TransRe and to ensure that Calpe employs personnel with the skills, knowledge and expertise necessary for the discharge of the responsibilities allocated to them.

Calpe actively encourages staff to further develop and pursue professional qualifications. Development is the responsibility of each staff member.

In addition to the above, all staff who maintain professional qualifications are expected to undertake Continuing Professional Development (CPD) in line with their relevant professional body requirements.

B.3 Risk Management System including the ORSA

Calpe's Enterprise Risk Management ("ERM") framework has been developed to enable the Board and senior management to understand and appropriately manage and mitigate the risks associated with Calpe's objectives over the short, medium and longer term in a manner that is commensurate with Calpe's risk profile and business arrangements.

The ERM framework seeks to engender a culture of no significant surprises and to ensure adequate tools are available to manage the most important risks to Calpe, improve decision-making and to support the achievement of Calpe's business objectives. In summary, the purpose of Calpe's ERM framework is to:

- actively sponsor and foster a risk aware culture across Calpe, supporting staff in making risk management/based judgements, encouraging effective management of exposures within Calpe's stated risk appetite;
- ensure a clear, coherent risk strategy that includes policies and standards, risk appetites and clarity of ownership for risks;
- ensure risk is taken into account in key business decisions;
- ensure that the 'three lines of defence' model operates effectively;
- implement risk strategies and policies that align with Calpe's strategic and operational objectives;
- ensure risks and emerging risks are identified and understood and assessed on a forward-looking basis to allow management to take proactive steps; and
- sustain a robust Own Risk and Solvency Assessment ("ORSA") process that informs management's view of risk and capital.

Calpe's ERM framework is supported by a comprehensive set of risk policies and guidelines to help ensure adequate processes and procedures are in place to manage all types of risk which is supported by a comprehensive suite of management information. The framework is aligned with the regulatory requirements under the Solvency II regime as adopted by GFSC.

By adopting this approach, Calpe is able to effectively identify, measure, monitor, manage and report risks at an individual / contract level and at an aggregated level on an ongoing basis.

Calpe senior management and risk owners identify key risks to the business, as part of a rolling risk identification and assessment programme that takes places on a quarterly basis. Risk causes and consequences, together with mitigating controls, are identified for each risk category. Key risks, owners and mitigating controls are recorded in a risk register; which is presented to management on a quarterly basis for review and discussion. This would include a review of those risks with the highest risk scorings and a review and discussion around emerging risks.

The risks recorded in the register form part of Calpe's ORSA process and are used as the basis for the development of Calpe's internal audit programme. Calpe's Risk & Audit Committee receives regular reports from Calpe's Risk Management function which consider key risks to Calpe, aggregations and exposures across the key ERM pillars.

Calpe's Risk Management function is integrated into the organisation through the reporting lines to Calpe's Risk Management function holder, Calpe's Risk & Audit Committee and ultimately through to TransRe's

Chief Risk Officer ("CRO"). Calpe's Risk Management function holder is also a member of and participates in key decision making forums. In addition to these reporting lines and membership responsibilities, TransRe's Head of Risk – International (or a nominated individual) attends Calpe's Risk & Audit Committee to ensure that any key matters can be reported and escalated to TransRe's Corporate Risk Management Committee.

In addition, the Risk Management function's roles and responsibilities include:

- developing, communicating and implementing systems, processes and procedures for the management and evaluation of risk accumulations and providing key risk indicator reports;
- working alongside other key control functions and ensuring existing control activities and reports are developed into the risk and control reporting framework;
- coordinating with the key control functions to ensure internal policies, controls and procedures for identifying and managing key risks are documented in sufficient detail to allow for effective compliance, testing and auditing;
- coordinating documentation of the key internal policies, procedures and controls for the management of risks identified in the risk register;
- monitoring and reporting emerging risks; and
- providing input and challenge into the development of stress and reverse stress tests for Calpe.

By adopting such an approach, ERM and risk management more broadly are key considerations as part of the decision making process.

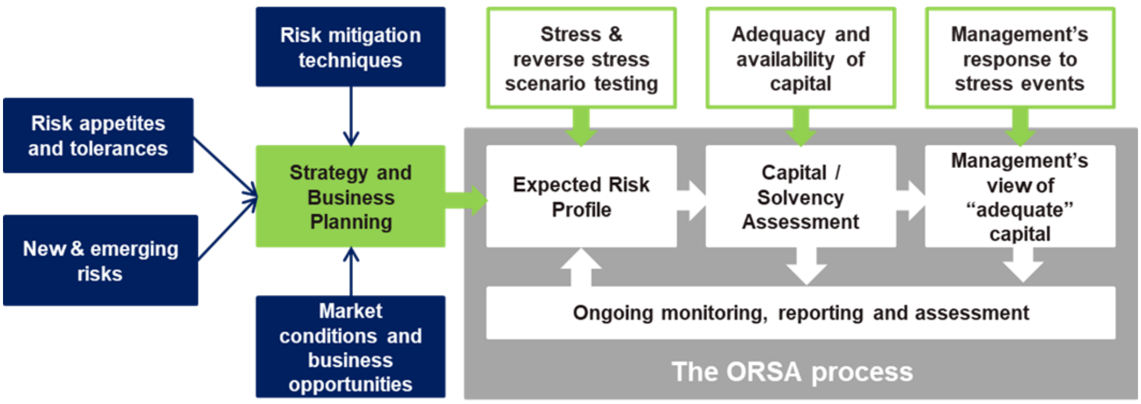
Own Risk and Solvency Assessment

The ORSA process considers Calpe's own solvency assessment given its risk profile, business objectives and capital management strategy against its regulatory solvency requirement in order to determine whether additional solvency cover is required. The ORSA also considers the impact on Calpe should it be subject to significant losses arising from both insurance and non-insurance events; against such extreme events, the ORSA considers what actions Calpe management would undertake to mitigate the impact of such events.

Calpe produces an ORSA report on at least an annual basis during the budgeting process subject to there being no material changes in the business or the risk profile in the meantime. The ORSA is a key management tool and is linked to Calpe's business planning and strategy, the risks Calpe is exposed to and the capital required to mitigate such risks.

The ORSA process can be diagrammatically represented as follows:

Figure 11: Calpe's ORSA process



The ORSA process provides Calpe with a mechanism to assess the risks it faces and to determine the necessary level of capital required to ensure Calpe meets its strategic and business objectives. The ORSA is Calpe's view of its exposure to underwriting and non-underwriting risks and its solvency position and documents how Calpe has reached its conclusions. The ORSA aims to assess, in a continuous and forward looking manner, the overall solvency needs of Calpe, whilst being mindful of its risk profile and business environment.

Calpe's Board provide input and review the scenarios considered within the ORSA stress tests. In addition, Calpe senior management has identified a number of triggers that would result in the ORSA being re-run at any point during the year; these triggers are tracked by the Risk Management function and reported to the Risk & Audit Committee every quarter. In addition to the tracking of the ORSA triggers, every quarter the ORSA capital target against eligible own funds is presented to the Risk & Audit Committee; this aids senior management in monitoring Calpe's capital adequacy.

Calpe's Risk Management function coordinates the relevant processes with subject matter experts across the business and prepares the ORSA report for review and discussion by Calpe's Board. Once the report is reviewed, the ORSA and the amount of capital Calpe intends to maintain, based on its expected risk profile, is approved by the Board and the ORSA report is shared with the GFSC.

B.4 Internal control system

Within Calpe, there is a robust internal control system that includes:

- the corporate governance framework, procedures and controls;
- a financial control framework;
- independent control functions which comprise of the Actuarial, Compliance and Risk Management functions; and
- independent assurance provided by the Internal Audit function.

Responsibility for establishing an appropriate internal control environment rests with the Board as a whole and its Directors individually.

The financial control framework is designed to ensure that:

- risks relevant to the preparation and fair presentation of the financial statements in accordance with the applicable financial reporting framework have been identified and documented; and
- there are sufficient and effective controls in place (both manual and automated) to mitigate these risks and to prevent or detect material misstatements in the financial statements and disclosures.

The International Financial Reporting Standards ("IFRS") financial statements are subject to rigorous controls in their production and review leading up to publishing. The actuarial liabilities are produced using best practice actuarial practices that are subject to independent review with the financial statements subject to internal review and external audit review. The financial statements are subject to external audit and are presented to the Board for sign-off prior to publishing.

In addition to the above, Calpe's Internal Audit function, through planned and commissioned reviews of Calpe's processes, provides an independent opinion on the internal control framework of Calpe's business.

Implementation of Calpe's Compliance function

Calpe maintains compliance policies and procedures that establish systems of control and supervision sufficient to provide reasonable assurance that Calpe, and those individuals acting on its behalf, comply with Gibraltar legislation, and to manage the risks associated with its business in accordance with prudent business practices and within TransRe's overarching compliance requirements.

The day-to-day activities of the Compliance function are managed by Artex Risk Solutions (Gibraltar) Limited. Artex's Compliance activities are supervised by Colin Peters as Compliance function holder and Calpe's Risk & Audit Committee.

The Compliance function has sufficient authority and independence to carry out its functions on its own initiative without obstruction from management and other staff members.

The Compliance function's responsibilities include:

- advising the Board on compliance with Solvency II and related laws and regulations;
- providing training and guidance regarding applicable law and regulation and TransRe's and Calpe's policies, and clearly communicating ethical guidance;
- monitoring complaints received by MGAs and co-insurers from policyholders or claimants;
- assessing the possible impact of any changes in the legal and regulatory environment on the operations of Calpe;
- identifying and assessing compliance risks relevant to Calpe and managing the control environment that mitigates those risks;
- undertaking compliance monitoring and making recommendations to improve the effectiveness of compliance practices; and
- identifying Calpe compliance training needs and implementing effective compliance training programmes, as required.

B.5 Internal Audit function

The Calpe Internal Audit function is led by the TransRe Director of Internal Audit, based in New York, USA under the oversight of Paul Cole, Internal Audit function holder for Calpe. Internal Audit is an independent function that provides objective challenge and assurance over Calpe. Internal Audit supports Calpe in accomplishing its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes. Those carrying out the Internal Audit function do not assume any other key functions.

The Internal Audit function is supervised by the Risk & Audit Committee, with ultimate oversight provided by Alleghany's Audit Committee. Rolling three-year audit plans are submitted annually to the Calpe Risk & Audit Committee and TRH Audit Committee for approval. Results of internal audits are distributed to Calpe's senior management, the Calpe Risk & Audit Committee and to TRH's Audit Committee. Outstanding internal audit actions are tracked and progress reported to the Calpe Risk & Audit Committee and TRH Audit Committee.

In addition to reporting into the Calpe Risk & Audit Committee, the Internal Audit function holds regular meetings with Calpe's Head of Risk to evaluate the effectiveness and adequacy of the internal control system and other areas of governance, as well as to discuss progress against the annual internal audit plan.

Calpe utilises Mazars LLP in the UK to perform the majority of audits. Mazars provides local resources who report to Calpe's Risk & Audit Committee and TRC's Director of Internal Audit. Utilising a third party enables Calpe to benefit from subject matter experts aligned with processes reviewed in the different business units. Mazars also benchmarks processes and controls against other insurance market participants, as appropriate.

B.6 Actuarial function

Calpe's Actuarial function gains its authority from Calpe's Board and TransRe's Group Chief Actuary. Calpe's Board maintains ultimate responsibility for oversight of Calpe's Actuarial function. Calpe's Actuarial function is provided by TRLS via an intragroup service agreement.

The Actuarial function is responsible for:

- coordinating the calculation of technical provisions;
- ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
- assessing the sufficiency and quality of the data used in the calculation of technical provisions;
- comparing best estimates against experience;
- informing the administrative, management or supervisory body of the reliability and adequacy of the calculation of technical provisions;
- overseeing the calculation of technical provisions in the cases set out in Article 82;

- expressing an opinion on the overall underwriting policy;
- expressing an opinion on the adequacy of reinsurance arrangements; and
- contributing to the effective implementation of the risk-management system.

These activities are undertaken on at least an annual basis and are reported to the Board in an internal Actuarial Function Report.

B.7 Outsourcing

Outsourcing management

For each outsourcing arrangement, a Calpe manager (the "Outsourcing Owner") is identified. The Outsourcing Owner is responsible for identifying whether the activity to be outsourced is critical or important, carrying out pre-contract due diligence including know your counterparty ("KYC") checks and agreeing the terms of the engagement. The Outsourcing Owner is also responsible for the ongoing oversight and management of outsourcing arrangements.

Claims handling is outsourced to third party firms either directly in respect of Managing General Agents ("MGA") or indirectly via a claims handling agreement between the lead insurer and the claims handler where Calpe's role is one of a co-insurer.

Outsourcing of critical or important operational functions

Details of outsourcing in respect of Calpe's critical or important operational functions are set out in figure 12.

Figure 12: Outsourcing of critical or important operational functions

Outsourcing	Jurisdiction
Insurance management services, including underwriting, claims and reinsurance support and governance and company secretarial, financial management, regulatory and compliance services, are provided by Artex under an insurance management services agreement.	Gibraltar
Certain intra-group services and support services, including underwriting support, claims and reinsurance support, actuarial, investment, accounting and treasury services and internal audit are provided by TRLS and TRC under a services agreement.	UK (TRLS) New York, USA (TRC)
Calpe outsources the day-to-day activities of its Internal Audit function to Mazars, as described in section B5.	UK
Calpe's day-to-day investment management activities are outsourced to BlackRock Investment Management (UK) Limited ("BlackRock"), a member of the BlackRock group. BlackRock's performance is monitored by Alleghany's and TransRe's treasury management functions, both based in New York, USA with further oversight provided by TRL's CFO in the UK. BlackRock reports quarterly to Calpe's Investment Committee.	UK

B.8 Any other information

Calpe's system of governance has not materially changed during the year to 31 December 2018.

Calpe does not consider there is any other material information to disclose on its system of governance.

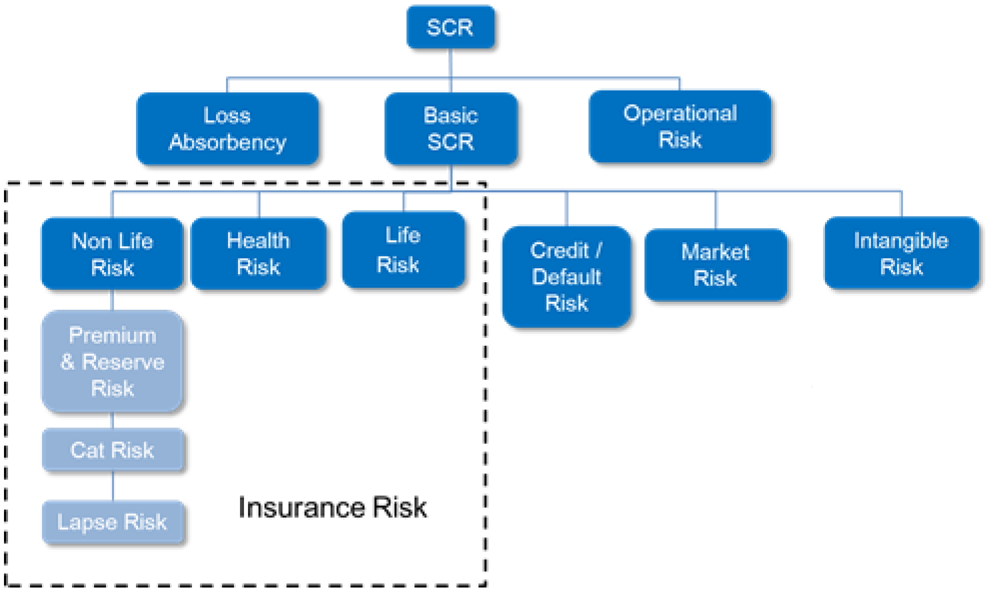
C. Risk profile

Calpe is a primary insurer and maintains a licence to write motor and property business. Key points regarding Calpe's risk profile are that it:

- provides insurance and co-insurance support to MGAs and insurers that have the expertise to underwrite property and motor classes of business; and
- predominantly focuses on UK motor business.

Calpe's Solvency Capital Requirement ("SCR") is calculated using the Standard Formula for all components. The Standard Formula is a risk based capital requirement that covers underwriting risk, market risk, credit risk and operational risk in a formulaic way and can be diagrammatically represented as follows:

Figure 13: Standard Formula risk modules



The above diagram does not include the effect of diversification benefits or adjustments.

Each of the key risk categories and keys risks relevant to Calpe are described in further detail below.

C.1 Underwriting risk

Key underwriting risks Calpe is exposed to include:

- Premium / Underwriting risk
  - excessive aggregation/catastrophe risks in a single region/location;
  - writing outside of appetite;
  - excess exposures in certain driver demographics and/or territories; and
  - underwriting below the technical price;
- Reinsurance risk
  - failure of reinsurance counterparties or reinsurance programmes; and
- Reserve risk
  - reserve risks, including inadequate reserving due to flaws in the provisioning/reserving methodology or in the application of the methodology, inadequate Incurred But Not Reported ("IBNR") and inadequate Incurred But Not Enough Reported ("IBNER").

Calpe maintains a number of risk mitigation techniques and approaches to manage the risks associated with its underwriting risk profile. Further information on the monitoring and approach is provided below.

Premium / underwriting risk management

Calpe maintains a clear underwriting philosophy that is supported by risk appetites and tolerances, procedures and controls in relation to pricing, rigorous risk selection criteria and the ability to underwrite a diverse range of insurers and MGAs.

Calpe's main risks are that an MGA or co-insurer fails or seeks to accept business that is outside of the agreed underwriting criteria that Calpe has set.

Calpe has developed robust underwriting selection procedures and potential co-insurance and MGA partners are subject to a comprehensive due diligence process.

Calpe assesses and mitigates these risks by having in place:

- ongoing monitoring and exposure management, assessing individual and aggregate exposures;
- ongoing exposure management against risk tolerances and against a range of extreme events and stress tests; and
- ongoing reviews of underwriting activities, including quarterly underwriting performance reviews, pricing adequacy reviews and rate monitoring supplement the oversight framework.

Reinsurance risk

Calpe benefits from a comprehensive reinsurance programme that provides protection to Calpe's balance sheet. All placements are subject to approval and must comply with TransRe's group-wide retrocession/reinsurance purchasing procedures (which include minimum credit quality and counterparty limits) and delegated retrocession/reinsurance purchasing authorities.

Calpe does not have any exposure to any special purpose vehicles.

Reserve risk management

Reserve risk is managed through the oversight provided by Calpe's Claims, Underwriting & Reserving Committee which has put in place a number of controls and mitigants that include:

- a comprehensive annual reserve study;
- quarterly reserve reviews;
- reserving risk controls that include major activity reports, high cost claim alerts, major loss memos and reinsurance transaction alerts;
- ad-hoc reserving studies; and
- independent validation of reserves.

Risk sensitivity for underwriting risks

Calpe undertakes detailed stress and scenario testing as part of its ORSA process.

As part of the ORSA process, the solvency position and the projected solvency position over the business planning period have been calculated following adverse stresses at different return periods for the material underwriting risks (each risk's stress is considered individually) in addition to multiple losses arising from non-correlating events (e.g., market risks and underwriting risks or a series of events). In addition to these underwriting events, consideration has been given to the risk of a material deterioration in Calpe's reserves, including adverse development in claims ratios and IBNR.

The results of the analysis showed that the most material impact on the SCR arose from prolonged poor underwriting results or through reserve deterioration (arising from poor/weak reserving methodology). The analysis undertaken indicated that it would take a significant event to breach the SCR and therefore Calpe's underwriting risk profile was assessed to be resilient to withstand severe shocks and is within the Board approved risk appetite.

Process(es) for monitoring the effectiveness of risk mitigation techniques

As a subsidiary of a globally active reinsurance company, Calpe benefits from a robust risk management framework that oversees Calpe's risk profile via various governance committees throughout Calpe and TransRe, the ORSA process, Calpe's risk register and the stress and scenario testing Calpe performs.

Furthermore, Calpe's reserves are subject to a quarterly review and are then subject to an independent review as part of the annual statutory audit.

Prudent person principle

When making investment decisions, Calpe considers the average duration of the assets that it invests in and ensures there are no correlations between its underwriting profile and its investments.

C.2 Market risk

Market risk is the risk of loss or adverse change in Calpe's financial situation resulting from changes in the value of its assets and liabilities caused by the volatility of market prices of assets, liabilities and financial instruments.

For Calpe, market risk comprises of the following key components:

Figure 14: Standard Formula market risk sub-modules

Calpe's Investment Committee reviews investment strategy annually and makes recommendation to the Board. The investment strategy is based on four key principles:

1. preserve capital;
2. increase surplus;
3. maintain liquidity; and
4. optimise after tax total return on investments, subject to (1)-(3) above.

Calpe's investment strategy forms the basis for the mandate given to Calpe's asset managers (BlackRock). The mandate includes limits on certain classes and types of investments, restriction on investments in certain industries and sector and geographical limits. BlackRock is also provided with list of companies that investments should not be purchased in. The execution of Calpe's investment strategy is subject to ongoing monitoring and scrutiny by the Investment Committee.

Calpe has a material risk concentration to the UK government; this is mitigated through ongoing review and monitoring by the Calpe Board and Calpe's asset managers. Furthermore, Calpe's liabilities are predominantly in GBP.

Calpe is exposed to the following key market risks:

Interest rate risk

Movements in interest rates affect the level and timing of cash flows for Calpe and the fair value of the fixed income securities. As interest rates rise, the fair value of fixed income portfolios declines and conversely, as interest rates decline, the fair value of fixed income portfolios rises. To minimise this risk, Calpe adheres to investment policy guidelines developed by Calpe's Board in line with Calpe's strategy and TransRe's overall objectives. These guidelines direct Calpe to invest in high-quality issuers and, in particular, the strategy is to position its fixed income securities based on its view of future interest rates and the yield curve, balanced with liquidity requirements.

Spread risk

This relates to the potential financial loss Calpe may suffer arising from a movement in the spread an asset trades at when compared to a comparable government bond. Calpe is exposed to this as it maintains a large amount of corporate bonds within the investment portfolio.

Foreign currency risk

Assets backing the liabilities of Calpe are predominantly maintained in GBP, thereby mitigating the potential impact of foreign exchange and interest rate risk on Calpe's solvency position

Calpe's investment portfolio is split across the following asset classes:

Figure 15: Portfolio composition as at 31 December 2018

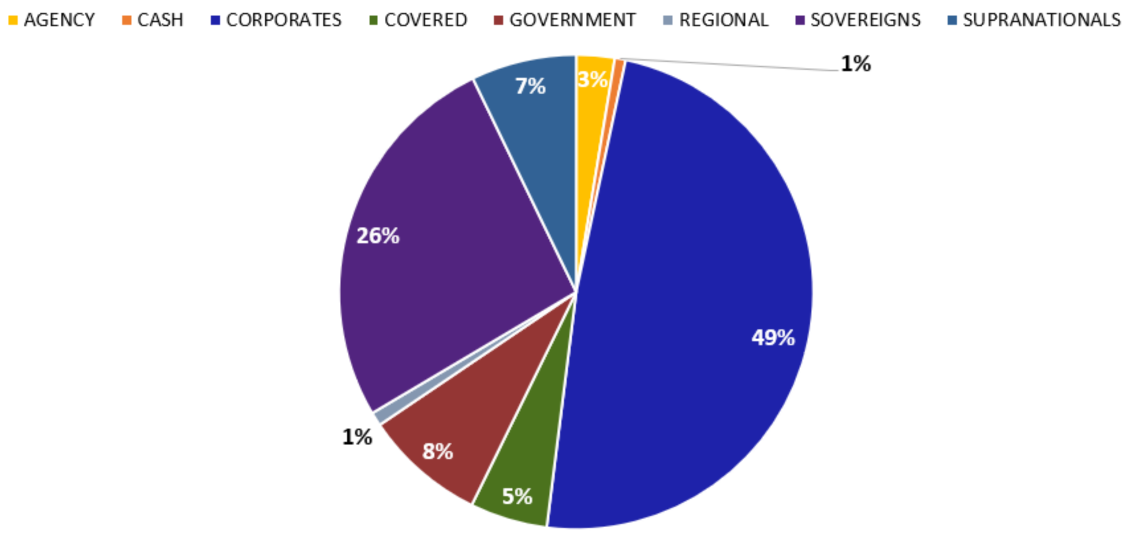
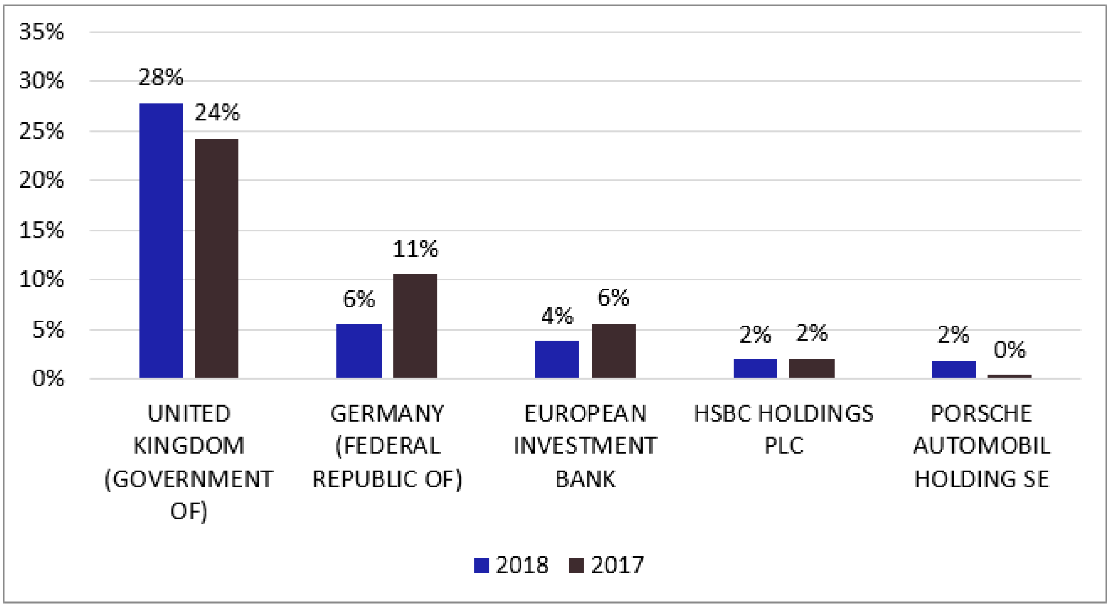


Figure 16: Top 5 Portfolio issuer exposures as at 31 December



Market risk management and mitigation techniques

Calpe maintains a number of risk mitigation techniques and approaches to manage the risks associated with market risk. Key techniques and controls that are in place include:

- investment risk and underwriting risk accumulation reporting, including issuer accumulations;
- mandates and guidelines provided to external investment managers, which include:
  - regulatory compliance;
  - duration;
  - benchmark portfolio;
  - credit quality;
  - sector limitations; and
  - issuer limitations;
- Investment Committee mandate and oversight;
- stress testing; and
- market risk/value at risk analyses, including extreme market and currency stress tests (+/- 300bps movement).

Stress and sensitivity tests

Calpe performs stress and scenario testing as part of its approach to managing market risk. Results are considered as part of the ORSA process. For the 2018 ORSA, the solvency position and the projected solvency position over the business planning period were re-calculated following adverse stresses, including a 300bps change in interest rates in both directions and a prolonged economic downturn, which considered more severe low interest rate environment scenarios.

Under certain extreme scenarios, Calpe would need to seek further capital from its parent, under the TRC Capital Support Agreement. Reverse stress testing was also used to determine what combination of extremely low interest rates and other relevant underwriting factors might lead to a breach of the SCR.

Processes for monitoring the effectiveness of risk mitigation techniques

Calpe benefits from ongoing oversight of its investment portfolio by the Calpe Board and by TransRe's treasury function. Furthermore, the extreme stress tests incorporated into the ORSA process, Calpe's risk register and the quarterly stress and scenario testing Calpe performs supplement these controls.

Calpe's investment managers are provided with an investment mandate and are subject to quarterly compliance attestations confirming they have operated in accordance with the mandate.

Prudent person principle

When making investment decisions, Calpe considers the risks associated with the investments, including the potential impacts of any economic shock, their liquidity and their admissibility under the Solvency II rules.

All assets, in particular those covering the Minimum Capital Requirement and the Solvency Capital Requirement, are invested in highly rated and liquid assets that aim to ensure the security, quality, liquidity and profitability of the portfolio as a whole. All assets are held in GBP in Calpe designated portfolios which ensures their availability.

Assets covering the technical provisions are invested in a manner appropriate to the nature and duration of Calpe's insurance liabilities.

Calpe does not use derivative instruments nor hold assets that are not admitted to trading on regulated financial markets. Assets are managed in such in way as to limit excessive reliance on any particular asset, issuer or group of undertakings, or geographical area that would represent an excessive accumulation of risk to the portfolio as a whole.

C.3 Counterparty default (credit risk)

Credit risk is assumed whenever Calpe is exposed to a loss if another party fails to perform its financial obligations to Calpe, including the failure to perform them in a timely manner. This includes default by MGAs, brokers, reinsurers, customers, investment counterparties and suppliers. Included within this category is the management of the credit risk associated with the TRL Quota Share, as described in Section B1.

MGAs / brokers / intermediaries / reinsurers

Calpe has a credit risk with the co-insurers and MGAs that it generates business through as they represent the major conduit of business to Calpe. All MGAs, co-insurers, brokers, intermediaries and reinsurers are subject to ongoing review by a range of fora, which include the Risk & Audit Committee, the Claims, Underwriting & Reserving Committee, the Investment Committee and ultimately Calpe's Board.

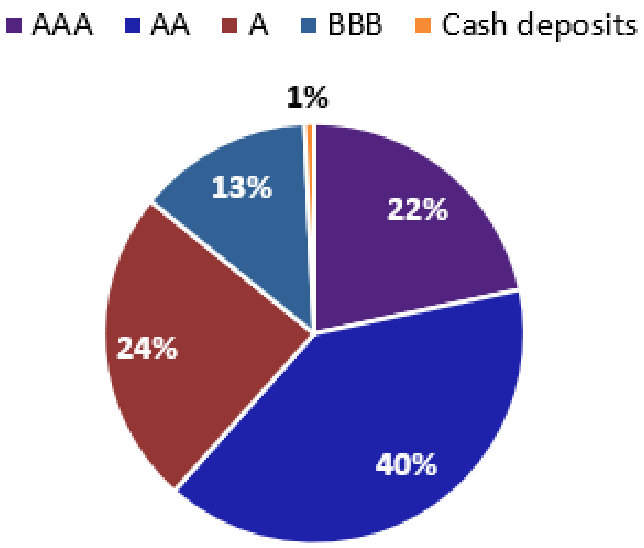
Prior to transacting with brokers, cedants or ceded reinsurers for the first time a KYC check is carried out.

Reinsurers must go through a credit and security assessment which is overseen by TransRe's Global Risk Management function ("GRM") based in New York. Once approved, they are placed on TransRe's approved Security List. All prospective markets and proposed programme limits are reviewed against the Security List prior to placement and in some cases require specific GRM approval prior to placement. The Security List designates separate short-tail and long-tail programme limits for each reinsurer.

Investment counterparties

Calpe maintains a well-diversified and highly rated investment portfolio. Calpe maintains all its investments in GBP, with its main investment exposure being to the UK Government and the average credit quality of its portfolio Aa3/AA-.

Figure 17: Portfolio credit quality as at 31 December 2018



Calpe credit risk management strategies include setting and monitoring the credit rating requirements for its investments. Adherence with these requirements ensures investments are selected in a way that enables the effective management of the risk of counterparty default to an acceptable level in line with Calpe and TransRe approved risk appetite and tolerances. The credit management strategy also takes into account the exposure to credit spreads.

To ensure compliance with rating requirements in Calpe's credit risk management strategy and to minimise the risk of counterparty failure arising from external parties, Calpe has established key risk indicators which are consistent with its investment strategy and investment risk appetite and tolerances. These indicators take into account, but do not rely solely on, the financial security rating and credit rating assigned by external rating agencies.

Calpe utilises external credit assessments primarily to:

- review the credit quality of assets in their investment portfolios; and
- review the credit quality of the reinsurers they utilise.

Calpe and TransRe do not rely solely on one rating agency and give consideration to a range of views provided by rating agencies as well as its own market knowledge and intelligence provided by professional investment managers.

TRL Quota Share

The TRL Quota Share is Calpe's largest credit risk. To mitigate the potential impact in the unlikely event TRL is unable to meet its contractual obligations, Calpe has the ability to call on the TRC Guarantee to require its parent to adequately recapitalise Calpe.

Key controls

The controls that aid in mitigating credit risk include:

- Board oversight;
- Risk & Audit Committee oversight
- investment risk reporting;
- approved reinsurer lists;
- mandates and guidelines provided to external investment managers, which include:
  - regulatory compliance;
  - duration;
  - benchmark portfolio;
  - credit quality;
  - sector limitations; and
  - issuer limitations.

Risk sensitivity for credit risks

Although credit risk is a material risk to Calpe as a result of the quota share arrangement with TRL, the sensitivity of the solvency ratio to credit defaults or rating downgrades of Calpe's counterparties has also been considered.

This demonstrated that Calpe is resilient to a range of events including severe counterparty rating downgrades or failure of TRL to meet its obligations under the collateralised quota share arrangement.

Processes for monitoring the effectiveness of risk mitigation techniques

Calpe is able to leverage its membership of a globally active reinsurance group to continually monitor and assess the effectiveness of its controls. Calpe's Risk & Audit Management Committee and the Board review Calpe's risk profile and the effectiveness of risk mitigating controls on a regular basis. Information is provided to key forums to enable the monitoring of reinsurance recoverables and excessive counterparty exposures to be tracked and action taken to enhance existing processes where appropriate.

Furthermore, Calpe benefits from the additional oversight provided by both TransRe's Counterparty & Credit Risk Committee and Alleghany's Reinsurance Committee, which monitor the credit quality of the retrocessionaires / reinsurers on TransRe's security list that Calpe follows.

Prudent person principle applied to credit risks

Counterparties are selected by taking into account the credit rating and reputation of each entity. Credit ratings are used as a way of properly identifying and managing the risk attached to a counterparty and Calpe ensures only counterparties with sufficiently high credit ratings are used. Calpe does not rely on a single rating agency, rather seeking to use a number of agencies as well as its own analysis.

C.4 Liquidity risk

Liquidity risk arises when Calpe, though solvent, either does not have sufficient financial resources available to enable it to meet its obligations as they fall due, or can secure them only at excessive cost. Calpe sees liquidity risk as the management of risk arising from short term cash flows, rather than the risk arising from longer-term matching of assets and liabilities. Liquidity risk is considered by Calpe's Investment Committee and Board.

Key controls

Key controls that aid in mitigating this risk include:

- investment risk and underwriting risk accumulation reporting;
- cashflow forecasting;
- asset/liability assessment performed every quarter;
- quarterly reserving exercise; and
- quarterly balance sheet.

Risk sensitivity for liquidity risk

Calpe has carried out liquidity risk stress testing as part of its ORSA process with the results reviewed by the Board. Calpe does not consider liquidity risk to be a material risk.

Process for monitoring the effectiveness of risk mitigation techniques

Calpe has established a liquidity risk framework which includes the establishment of a liquidity risk appetite. Adherence to the appetite is reviewed with Calpe reviewing its ability to meet its short and medium term financial commitments in a timely manner in both normal and stressed conditions.

Prudent person principle as applied to liquidity risks

The investment assets are prudently invested taking into account the liquidity requirements of the business and the nature and timing of the insurance liabilities. Calpe manages its liquidity risk by maintaining a diversified highly liquid investment portfolio.

Expected profit included in future premiums ("EPIFP")

The EPIFP as at 31 December 2018 is £1,860k. Following a change in guidance during 2018, this is stated gross of reinsurance and any associated recoveries. EPIFP as at 31 December 2017, on a net basis, was £907k.

C.5 Operational risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. Operational risk is diverse in nature and permeates all business activities but remains a distinct form of risk in its own right. Operational risk within Calpe has been divided into the following key risk areas:

- regulatory and legal – the risk of legal or regulatory sanctions or loss caused by a failure to comply with applicable laws, regulations, internal policy and standards of best practice;
- financial crime, including internal and external fraud – the risk that the firm might be used to further financial crime;

- cyber threats / data breaches and data privacy – the risks associated with unauthorised access to Calpe's systems caused by internal and external security breaches;
- financial & accounting – the risks associated with financial reporting and integrity of financial information;
- people risk – this is the risk that people do not follow Calpe's procedures, practices and/or rules, thus deviating from expected behaviour in a way that could damage Calpe;
- business continuity management – the risk associated with the failure to appropriately manage unforeseen events;
- model risk – the risk that the output from the models used by Calpe is incorrect or flawed due to errors in the design or operation or management's failure to understand the limitations in the output of the models;
- processing failures, including IT system failures; the risks associated with IT systems;
- outsourcing; failures relating to the outsourcing of key activities; and
- external events and other changes; failure to react to changes in the external business environment.

Calpe's directors identify the key risks, causes and consequences together with relevant mitigating controls, within their function/span of control, on an ongoing basis.

Each risk identified is assessed and scored using a standard matrix, on both an inherent basis and a residual basis after making allowance for risk mitigating controls in place.

Calpe maintains an Operational Risk policy that sets out Calpe's approach to mitigating risks arising from Operational Risks.

Key controls

Key controls that aid in mitigating this risk include:

- Risk & Audit Committee oversight;
- quarterly reviews by risk owners assessing the effectiveness of mitigating controls;
- policies and procedures, including the Group's Code of Conduct, business continuity plans and succession planning;
- operational risk appetites;
- escalation procedures;
- data quality;
- compliance training, procedures; monitoring and oversight;
- staff training, oversight and appraisals;
- cybersecurity dashboard;
- disaster recovery plan;
- service level agreements;
- anti-bribery and corruption procedures; and
- underwriting audits performed.

Risk sensitivities for operational risk

Calpe does not have any material exposures to operational risk.

On an ongoing basis, Calpe carries out stress and scenario testing as part of its approach to managing operational risk. Results are presented quarterly at the Calpe Risk & Audit Committee and considered as part of the ORSA process.

For the 2018 ORSA, the current and projected solvency position over the business planning period were re-calculated following adverse operational risk stresses. Under all of these scenarios, the analysis indicated that Calpe was able to withstand these events without breaching its SCR.

Process for monitoring the effectiveness of risk mitigation techniques

Calpe and TransRe have established an operational risk framework that monitors and records:

- key risks facing Calpe, including their mitigating controls and their effectiveness;
- operational risk events and losses;
- the environment in which Calpe operates; and
- emerging risks and the mitigating steps taken to monitor or address them.

The framework is supported by policies and procedures and a strong corporate culture that encourages early notification of operational events or losses. This enables the business to learn from events or near losses and to continually enhance its framework.

C.6 Other material risks

Franchise Value: Calpe recognises that its long-term success depends on its relationship with clients, brokers, rating agencies, regulators and capital providers and the TransRe brand. Consequently, Calpe and TransRe will not accept risks, both underwriting and non-underwriting, that may materially impair or impact the reputation of Calpe or TransRe.

Group Risk: As a wholly owned subsidiary of a large international group, there is a risk Calpe could be adversely affected by the actions of another company within the group. Should such an event arise that Calpe is able to rely on its own unencumbered capital.

Brexit: Details of Brexit and the principal risks to Calpe arising from it are included in Section A5.

Emerging risks: On an ongoing basis, TransRe and Calpe undertake horizon scanning with a view to identifying new and emerging risks. Annually, TransRe holds a Global Emerging Risk Forum in New York with senior level executives and employees from across the world attending. Where new and emerging risks are identified, these are tracked and reported on at key fora. This ensures Calpe is able to react quickly should the environment it operates in change.

C.7 Any other information

Calpe's coverage ratio as at 31 December 2018 is 138% (2017: 116%). The below table shows the change in the coverage ratio under several hypothetical scenarios.

Figure 18: SCR coverage ratio sensitivity analysis

Scenario	% change to coverage ratio
Exchange rates: +10%	0.1%
Exchange rates: -10%	-0.1%
Interest rates: +1%	-7%
Interest rates: -1%	8%
Credit spreads: +1%	-6%
Credit spreads: -1%	6%
Catastrophe loss: £100m gross, £0.1net of all reinsurance	-24%

Calpe does not consider there is any other material information to disclose on its risk profile.

D. Valuation for solvency purposes

Calpe's Solvency II assets and liabilities are presented on an economic basis consistent with the "fair value" accounting concept. Calpe prepares its statutory financial statements in accordance with International Financial Reporting Standards ("IFRS") as adopted for use in the European Union, and follows those parts of the UK's Companies Act 2006 applicable to companies reporting under IFRS. Full details of the basis for the preparation of Calpe's financial statements, critical accounting estimates and judgements and key accounting policies are set out in Note 1 to those financial statements.

Calpe's IFRS valuation is used where consistent with Solvency II's economic basis. Assets and liabilities measured at cost or amortised cost in Calpe's financial statements have been revalued to economic value. Solvency II also requires specific valuation approaches for some assets and liabilities, which have been followed.

Calpe exercises judgement in selecting each of its accounting policies. Company law and IFRS require management to select suitable accounting policies, apply them consistently and make judgements and estimates that are reasonable and prudent when preparing the financial statements, and Calpe has followed a consistent approach in selecting its valuation approaches for Solvency II. These judgements and estimates are based on management's knowledge as well as current factors and circumstances that may impact business performance, together with appropriate predictions of future events and actions. Actual results may differ from those estimates, possibly significantly. To the extent that actual experience differs from the assumptions used, Calpe's financial position, results of operations and cash flows could be materially affected.

The following sections describe the valuation approaches used by Calpe for valuing its assets and liabilities.

D.1 Assets

The material classes of assets shown on Calpe's Solvency II Balance Sheet, their Solvency II values and corresponding values shown in Calpe's financial statements (all in GBP) are summarised in the table below.

Figure 19: Summary assets as at 31 December 2018

(£'000s)	Solvency II	Financial Statements	Difference
Deferred acquisition costs	0	1,656	(1,656)
Deferred tax assets	264	0	264
Investments			
Government Bonds	18,832	18,832	0
Corporate Bonds	35,046	35,046	0
Reinsurance recoverables			
Non-life excluding health	115,948	146,047	(30,099)
Life excluding health	307	0	307
Total Receivables			
Insurance and intermediaries receivables	7,756	29,141	(21,385)
Reinsurance receivables	3,772	0	3,772
Receivables (trade, not insurance)	17	136	(119)
Cash and cash equivalents	4,258	4,258	0
Total assets	**186,200**	**235,116**	**(48,916)**

The following sections provide further details on the specific valuation policies that Calpe has applied to produce its Solvency II balance sheet.

Deferred acquisition costs

For a background to Calpe's approach to deferred acquisition costs, see the Financial Statements. Under Solvency II deferred acquisition costs are not recognised.

Investments

Recognition and derecognition of investments

For a background to Calpe's approach to recognition and derecognition of investments see the Financial Statements.

Fair value of investments

For a background to Calpe's approach to fair value of investments see the Financial Statements.

Impairment

For a background to Calpe's approach to impairment see the Financial Statements.

Valuation differences between the Solvency II and IFRS balance sheets

Solvency II requires a hierarchy of valuation methods to be applied to value assets and liabilities on the Solvency II balance sheet, as set out below:

1. Level 1: The use of quoted market prices in active markets for the same assets or liabilities;
2. Level 2: Where the use of quoted market prices in active markets for the same assets or liabilities is not possible, quoted market prices in active markets for similar assets and liabilities are used, with adjustments made to reflect factors specific to the asset or liability. All of Calpe's investment assets were classified as Level 2 as at 31 December 2018; and
3. Level 3: Where the criteria above are not satisfied, alternative valuation methods are used, which make maximum use of relevant market inputs (adjusted for factors specific to the asset or liability under valuation). To the extent that observable inputs are not available, use is made of unobservable inputs reflecting the assumptions that market participants would use (including assumptions about risk in the valuation technique).

Calpe considers its policy on the fair value of investments to be consistent with the hierarchy of valuation methods required for Solvency II. Accordingly, the valuation policy on fair values is applied consistently between Calpe's Solvency II reporting and its statutory financial reporting. Calpe's investment portfolio as at 31 December 2018 includes only investments that are valued at fair value. There are accordingly no differences in valuation relating to financial investments between Calpe's Solvency II and IFRS balance sheets, with the exception that the value of investments in the Solvency II balance sheet includes interest accrued since the last coupon payment, compared to the presentation in Calpe's financial statements where it is accounted for separately as accrued interest.

Calpe defines fair value as the price that would be received upon the sale of an asset or paid to transfer a liability in an orderly transaction between willing, able and knowledgeable market participants as at the measurement date. As part of Calpe's framework for measuring fair value, financial instruments are classified into a three-level hierarchy that is consistent with the Solvency II hierarchy described above.

Fair value sources and use of pricing vendors

Calpe uses New England Asset Management (NEAM) to provide pricing and fair value of its investments. Although Calpe outsources the portfolio valuation function to pricing vendors or relies on investment managers for valuations in certain instances, Calpe is responsible for ensuring that the supporting methodologies and assumptions employed by pricing vendors are consistent with and meet the objectives of fair value determination.

Reinsurance recoverables

For the differences in the valuation methodology between IFRS and Solvency II see Section D2.

(Re)insurance and intermediaries receivable

Receivables and payables are recognised when due. These include amounts due to and from agents, brokers and insurance contract holders. Receivables and payables are recognised at the amount expected to be received or paid when due. Due to the short term nature of Calpe's (re)insurance receivables and payables, amounts are not discounted.

The presentation of (re)insurance receivables and payables on the Solvency II balance sheet differs from Calpe's statutory financial statements, since (re)insurance receivables and payables for financial reporting purposes include premiums and claims which are included in Technical Provisions in the Solvency II balance sheet.

Other receivables (trade not insurance)

The valuation and presentation of Calpe's other receivables and payables, in the Solvency II balance sheet, is consistent with the treatment for Calpe's external financial reporting.

Cash and cash equivalents

For a background to Calpe's approach to cash and cash equivalents see the Financial Statements.

Foreign currency transactions and balances

Calpe presents its financial statements in GBP, which is Calpe's functional currency. Calpe applies a consistent policy for translating transactions and balances in currencies other than the relevant currency of presentation between its financial statements and Solvency II reporting. Where necessary, ground up recalculations for each reporting currency are performed for items with multiple underlying exchange rates (for example, for deferred acquisition costs).

For further background to Calpe's approach to foreign currency transactions and balances see the Financial Statements.

Translation to functional currency

For a background to Calpe's approach to translation to functional currency see the Financial Statements.

Deferred tax

Deferred tax balances (other than in respect of the carry forward of unused tax credits and unused tax losses) are determined by reference to the difference between the Solvency II balance sheet and the values ascribed for tax purposes.

A positive value is only ascribed to deferred tax assets where it is probable that future taxable profits will lead to the realisation of that deferred tax asset. This assessment takes into account time limits that apply to the carry forward of unused tax losses or credits.

Deferred tax balances are recognised and valued in relation to all assets and liabilities that are recognised for solvency or tax purposes. Deferred tax balances are not discounted.

Deferred tax is recognised and valued on a basis consistent with treatment under IFRS. For example, under IFRS:

- all temporary differences between the assets and liabilities in the statement of financial position and their tax base are included within the calculation; and
- deferred tax assets or liabilities are accounted for using the balance sheet liability method and assets are recognised to the extent that realising the related tax benefit through future taxable profits is likely.

However, for Solvency II purposes, the recognition and valuation of deferred tax assets or liabilities is carried out by reference to the Solvency II balance sheet rather than the accounting basis.

The resulting amount of deferred tax differs as a result of changes in recognition and valuation of other balance sheet items.

Figure 20: Deferred tax calculation as at 31 December

£'000s	2018	2017
Deferred tax asset per financial statements	**0**	**0**
Adjustment needed (all timing differences are expected to unwind at a tax rate of 10%)		
Deferred acquisition costs (DAC)	166	193
Change in technical provisions ("TPs") (including removal of UPR)	(145)	(200)
Risk margin	240	319
Receivables (trade, not insurance)	3	(3)
Total Solvency II deferred tax asset	**264**	**309**

D.2 Technical provisions

Calpe holds technical provisions to represent the current amount it would have to pay to for an immediate transfer of its obligations to another insurer. The technical provisions are comprised of two key elements:

Best Estimate Liabilities are the probability weighted average of future cash flows, discounted back to the relevant balance sheet date using risk free discount rates. This includes all of the relevant cash inflows and outflows to meet the requirements of the policies Calpe is obligated to at the valuation date.

The risk margin represents an allowance for the cost of capital necessary to support the policies Calpe is obligated to at the valuation date over their lifetime. It is calculated by taking 6% of future capital requirements attributable to the policies and discounting back to the relevant balance sheet date using risk free discount rates.

Calpe calculates its technical provisions using the sum of the BEL and risk margin, therefore:

Technical Provisions = Best Estimate Liability + Risk Margin

Calpe does not calculate technical provisions as a whole.

Segmentation into lines of business

Best estimates are segmented into twelve lines of business for non-life insurance obligations (with additional segmentation for non-proportional reinsurance accepted) and three lines of business for health insurance obligations pursued on a similar basis to non-life insurance (with additional segmentation for non-proportional reinsurance accepted).

The technical financials of Calpe are mapped to Solvency II lines of business according to "sub-department" classification in Calpe's accounting system, subject to allocations for certain sub-departments, which include private and commercial motor. With the exception of these allocations, the sub-departments and Solvency II lines of business are in one-to-one correspondence.

Figure 21: Technical provisions by line of business as at 31 December 2018

Technical provisions bases, methodologies and key assumptions

Solvency II line of business (£'000)	Gross	Reinsurance ceded	Net	Risk Margin	Total TP
Motor vehicle liability insurance	125,542	97,612	27,930	2,022	29,952
Other motor insurance	22,155	17,226	4,929	357	5,286
General liability insurance	1,400	1,110	290	21	311
Total non-life	**149,097**	**115,948**	**33,149**	**2,400**	**35,549**
Annuities	313	308	5	0	5
Total life	**313**	**308**	**5**	**0**	**5**
Total technical provisions	**149,408**	**116,256**	**33,152**	**2,400**	**35,552**

Basis

Calpe uses the IFRS financial reporting framework as the starting basis for determining the Solvency II technical provisions.

The following sections outline the key methodologies and assumptions in determining the technical provisions. Where relevant, adjustments to the IFRS basis to move to the Solvency II basis are highlighted.

Figure 22: IFRS to Solvency II reconciliation for the year ended 31 December 2018

Solvency II Line of Business	Assumed £'000s	Ceded £'000s	Net £'000s
IFRS Technical Provisions	**186,319**	**146,047**	**40,272**
Deferred acquisition costs	(8,278)	(6,623)	(1,655)
Contingent commission costs	(7,271)	(4,032)	(3,239)
Reserving margins	(4,519)	(4,988)	469
Future premiums & acquisition costs	(14,115)	(11,682)	(2,433)
Future other expenses	337	0	337
Legally obliged unincepted business	(236)	(198)	(38)
Discounting	(2,829)	(2,234)	(595)
Counterparty default	0	(34)	34
Solvency II best estimate	**149,408**	**116,256**	**33,152**
Risk margin	2,400	0	2,400
Solvency II technical provisions	**151,808**	**116,254**	**35,552**

Best estimate liability

The BEL is calculated as the sum of the following two components:

Claims provision

Calpe holds a claims provision that relates to claims events already incurred, regardless of whether reported or not. The provision includes all cash flows associated with all future benefits, expenses and premiums related to the claims events. Calpe considers the expected incidence and cost of future claims, including infrequent, high severity claims and latent claims. The best estimate claims provision is calculated as:

- the best estimate of outstanding losses, and any expenses in loss-adjustment (Loss Adjustment Expenses, or "LAE");
- plus the best estimate of incurred-but-not-reported claims ("IBNR") based on earned premiums;
- plus the best estimate of unpaid non-contingent acquisition costs that have been incurred;
- plus the best estimate of unpaid contingent commission on earned premiums;
- plus the best estimate of unpaid other expenses that have been incurred; and
- less the best estimate of unpaid premiums that have been earned.

Further information on the calculation of these items is discussed in the following sections.

Premiums provision

Calpe holds a premium provision for events which may happen in the future that fall within the contract boundary. The provision includes all cash flows associated with all future premiums, claims and benefits related to these events. Calpe considers the expected incidence and cost of future claims, including infrequent, high severity claims and latent claims. The best estimate premium provision is calculated as:

- the best estimate of IBNR claims based on unearned premiums;
- plus the best estimate of unpaid non-contingent acquisition costs that are deferred;
- plus the best estimate of unpaid contingent acquisition costs based on unearned premiums;
- plus the best estimate of unpaid other expenses based on unearned premiums; and
- less the best estimate of unpaid premiums that are unearned.

Further information on the calculation of these items is discussed in the following sections.

Methodologies for loss reserves and IBNR

The methods employed to estimate loss reserves include the following:

Paid loss development, incurred loss development methods

In the loss development methods, paid and incurred losses are projected to the time period by which the liabilities are extinguished (known as the 'ultimate' time period) by applying appropriate development factors to the inception-to-date paid and incurred losses to date.

Paid Bornhuetter-Ferguson ("BF") and incurred BF methods

In the Bornhuetter Ferguson methods, estimates of unpaid and unreported losses based on earned premiums (on an ultimate basis) are calculated by multiplying earned or ultimate premiums for each contract by an expected loss ratio ("ELR") and an estimated percentage of unpaid or unreported losses. The percentages of unpaid or unreported losses are derived from the loss development factors described below.

In establishing reserves for IBNR losses, three key actuarial judgements are used to project losses:

- Loss development factors ("LDF") — these are used to arrive at the ultimate amount of losses incurred for each underwriting year based on reported loss information. These factors, which are calculated initially based on historical loss development patterns (i.e. the emergence of reported losses over time relative to the ultimate losses to be paid), may then be adjusted for current trends;
- Loss trend factors ("LTF") — these typically focus on any underlying trends which may progress through the projection into the future, such as provisions for inflation, including social inflation (awards by judges and juries which increase progressively in size at a rate exceeding that of general inflation), and trends in court interpretations of coverage; and
- Expected loss ratios ("ELR") — for the latest underwriting years generally reflect the ELRs from prior underwriting years adjusted for LTFs, as well as the impact of changes in rating strength and other quantifiable factors.

These methods yield an indication of the ultimate losses for each underwriting year. The IBNR reserve is then determined by subtracting the reported losses from the indicated ultimate losses.

Estimates of reserves for IBNR claims take into account a number of assumptions with respect to factors that will affect ultimate losses. The techniques Calpe uses (described above) are employed to estimate ultimate losses, including the delay between the claim being reported to the (co)insurer, and the insurer reporting the claim to Calpe. Expert judgement is employed to select the most appropriate method, particularly when the delays previously identified within the data fluctuate between claims.

During the loss settlement period, additional facts regarding individual claims and trends will emerge. As these facts and trends emerge it usually becomes necessary to refine and adjust the loss reserves upward or downward; and even then, the ultimate net liability calculated by Calpe may be materially different from the original estimates. There is potential for significant variation in the development of loss reserves when actual costs differ from those costs implied by the use of the assumptions employed in the process of setting reserves.

Methodologies for expired and unexpired periods of coverage

With respect to expired periods of coverage, IBNR amounts calculated under IFRS are intended to reflect undiscounted best estimates of unpaid and unreported obligations, without margins for prudence.

With respect to unexpired periods of coverage, the valuation of technical provisions under Solvency II includes future cash flows with respect to premiums, losses (including claims management costs) and acquisition costs. Consequently, differences arise between the valuation of technical provisions in the IFRS financial statements of Calpe and the corresponding valuation of technical provisions for Solvency II.

The estimation of unpaid and unreported losses arising from unexpired periods of coverage is based on the same principles underlying the corresponding calculations for expired periods of coverage. Calpe estimates ultimate losses for each contract by multiplying:

- ultimate premiums calculated for each contract; by
- the expected loss ratio; and
- an estimated percentage of unpaid or unreported losses.

The percentages of unpaid or unreported losses are derived from loss development factors and the indicated IBNR reserve is then determined by subtracting the reported losses from the indicated ultimate losses.

Future premiums & acquisition costs

Under IFRS, unpaid premiums and acquisition costs are shown separately on the balance sheet at the accounting date as insurance and reinsurance receivables and payables.

Under Solvency II, the cash flows in respect of future claims are reduced by the amount of expected future premium cash inflows and increased by the amount of expected future acquisition costs cash outflows.

Future other expenses

Under IFRS, unpaid other income or expenses are shown separately on the balance sheet at the accounting date as other receivables or payables as appropriate.

Under Solvency II, technical provisions are increased by the amount of expected future cash outflows in respect of other expenses. Calpe estimates the reserves for other expenses, as:

- other acquisition costs;
- claims management costs;
- general administration costs;
- overhead costs; and
- investment management costs.

Undiscounted best estimates of unpaid other expenses are then allocated by contract and Solvency II line of business and discounted back to the valuation date using the risk free rates.

The starting point for the calculation of the future other expense cashflows are historical data for the payment of other expenses by calendar period. Calpe calculates paid claims management costs and investment management costs, expressed as percentages of paid and incurred losses, and paid other acquisition costs, general administration costs and overhead costs, expressed as percentages of linear combinations of paid and written premiums. Best estimates of unreported claims management costs and investment management costs are then calculated by multiplying the relevant percentages by linear combinations of outstanding and IBNR losses. Best estimates of unreported other acquisition costs, general administration costs and overhead costs are calculated by multiplying the relevant percentages by linear combinations of accrued and unreported premiums.

Legally obliged unincepted business

At any given time, Calpe may have contracts that have been written but have not yet incepted (i.e. the cover has not yet commenced). For example, a contract that was bound on 28 December 2018 which incepts on 1 January 2019 would be included within legally obliged unincepted business at 31 December 2018.

Under IFRS, the valuation of insurance reserves does not include legally obliged unincepted contracts.

Under Solvency II, cashflows arising from these contracts are included within the premium provision. The calculations of technical provisions relating to legally obliged unincepted business use the same principles as the calculations for existing business; estimates of ultimate losses for each contract are obtained by multiplying ultimate premiums by an expected loss ratio for the forthcoming underwriting year. Expected loss ratios for forthcoming underwriting years are generally calculated based on the expected loss ratios from prior underwriting years, with adjustments to allow for loss trend factors and other quantifiable factors.

Events not in data

Calpe accounts for events not in data ("ENIDs") using a scenario approach, based on the business profile and data available.

Calpe, TRL and the London Branch of TRC have more than 24 years of credible claims experience which is used to derive assumptions. This historical claims experience contains many significant natural and man-made catastrophe losses.

Natural and man-made catastrophe scenarios, with associated severities and return periods, are established using expert judgement through discussions with underwriters and the catastrophe modelling team.

These scenarios, along with the historic data, are used in the selection of actuarial assumptions underlying the calculation of technical provisions for both solvency purposes and for the valuation in financial statements. As a result, ENIDs are implicitly included in underlying reserving patterns.

The specific ENID claim and premium provisions are split out using calculated factors for each line of business.

Discounting

The discounting of technical provisions is not required under IFRS.

Under Solvency II, Calpe calculates best estimates separately for obligations in different currencies using the relevant risk-free term structures of interest rates prescribed by EIOPA. The set of currencies for which spot discount curves are provided by EIOPA form a subset of the complete table of currencies defined in the accounting system of Calpe. Where, for a given currency, spot discount curves are not provided by EIOPA, the spot discount curve for US dollars is used by default or, if deemed material to the calculation of fair values, the relevant term structure determined according to the methodology specified in the Solvency II technical specifications.

The allocation of unpaid cash flows to different currencies with respect to premiums, losses, acquisition costs and other expenses is estimated for each contract based on corresponding historical allocations of inception-to-date cash flows and accruals, and other relevant information.

Development factors of paid premiums, losses and acquisition costs are used to separate expected future cash flows into incremental amounts in future calendar periods. Incremental expected cash flows are then discounted at the risk-free discount rate applicable for the relevant maturity at the accounting date. Discounting estimates of unpaid other expenses for the time value of money is based on development patterns of paid premiums for other acquisition costs, general administration costs and overheads; and paid losses for claims management costs and investment management costs.

Counterparty default

Calpe does not adjust the technical provisions calculated under IFRS for potential counterparty default.

Under Solvency II, the calculations of technical provisions are adjusted to reflect the potential for default events, which are defined to occur whenever counterparties fail to meet all of their obligations in full, whether arising from insolvency or dispute. The adjustment, which is given by the expected present value of the change in cash flows underlying the amounts recoverable, is calculated by multiplying:

Probability of default x Loss given default

These are defined as follows:

- Probability of default — cash flows are adjusted to reflect the likelihood of default at different time periods, also considering that cumulatively, counterparties are more likely to default as time moves on. The distribution of the time of default is assumed to have an exponential distribution, calibrated according to credit quality and the corresponding probability of default over one year. The derivation of credit quality is based on official credit ratings corresponding to those attributed by a commercial rating agency such as A.M Best, S&P, Moody's and Fitch, where such credit ratings are available. Where more than one official credit rating is available for a counterparty, the second-highest credit quality step is used.
- Loss given default — this is the impact of the default. Unless reliable estimates of these losses are available, the adjustment is calculated using an assumed loss of 50%. Calpe does not adjust the amounts recoverable to allow for deposits or collateralisation arrangements.

Risk margin

The risk margin is calculated as the present value of future SCRs, multiplied by the prescribed rate for the cost of capital of 6% per annum.

The following risks from the SCR are projected into the future:

- insurance risk (both reserve and premium risk) with respect to obligated business, whether incepted or not;
- counterparty default risk;
- operational risk; and
- unhedgeable or unavoidable market risk.

The 6% cost of capital is determined by Solvency II regulation. The cost of capital at each time period is discounted back to the valuation date using the risk free rate.

Reinsurance arrangements within the technical provisions

Under Solvency II, Calpe reflects the value of reinsurance agreements where risk is ceded to a third party (which includes consideration of the counterparty default calculations above) within the technical provisions. This allows Calpe to denote a technical provision figure net of reinsurance.

Existing reinsurance

Calpe employs both proportional and non-proportional ceded reinsurance.

With respect to proportional reinsurance, outwards reinsurance premiums and recoveries are calculated and included on the basis of correspondence, i.e. future premiums are included only to the extent that any associated liabilities are also included in the technical provisions. If a contractual liability does not exist, then the associated future premium cash flows are not taken into account within the valuation of technical provisions under Solvency II.

With respect to existing non-proportional reinsurance, the calculation of reinsurance recoverables is based on the principle of correspondence, but future premiums are subject to contractual minimums.

Future reinsurance purchases

To the extent that Calpe has a history of renewing outwards non-proportional reinsurance, the purchase of future outwards reinsurance is assumed in the assessment of technical provisions under Solvency II. In particular, expected cash flows arising from future reinsurance that will cover existing inwards contracts but has not yet been purchased at the valuation date are included in the valuation of the best estimate according to the principle of correspondence.

Uncertainty within the technical provisions

Calpe writes insurance coverages whose major risk factors materially impact the variability of the loss reserves. Calpe's portfolio has exposure to potentially long-tail motor liabilities (such as Payment Protection Orders) which could identically have volatile results.

At the primary insurance level there are significant risk factors which contribute to the variability and unpredictability of loss cost trends and loss emergence patterns. Calpe faces additional risk factors arising from its dependence on the claims reserving and reporting practices of its co-insurers, which vary greatly by size, specialisation, degree of sophistication, and country of operation, and are subject to change without notice.

Given the composition of Calpe's business, which includes exposure to a small number of motor portfolios, the loss cost trends are difficult to assess.

The variability in the loss cost trends, the difficulty inherent in estimating loss development patterns and tail factors for low frequency/high severity claims all contribute to the risk of adverse deviation in Calpe's loss reserves.

Calpe assesses continually the reserve adequacy of IBNR in light of the following factors:

- current levels of reserves for reported claims and expectations with respect to reporting lags;;
- catastrophe events;
- historical data;
- legal developments; and
- economic conditions, including the effects of inflation.

The actuarial methodologies employed to calculate loss and IBNR development incorporates the inherent lag from the time claims occur to when they are reported to an insurer and to when the insurer reports the claims to their reinsurers. Certain actuarial methodologies may be more appropriate than others in instances where this lag may not be consistent from period to period. Consequently, additional actuarial judgement is employed in the selection of methodologies to best incorporate that potential impact. Information gathered through underwriting and claims audits is also considered.

The estimation of Calpe's loss reserves is made more difficult and subjective in view of changing legal and economic environments that impact the development of claims. Such factors, both internal and external, which contribute to the variability and unpredictability of loss costs, include:

- trends relating to jury awards;
- social trends;
- medical inflation;
- worldwide economic conditions;
- tort reforms;
- court interpretations of coverages;
- the regulatory environment;
- underlying policy pricing;
- terms and conditions; and
- claims handling.

Consequently, quantitative techniques are frequently supplemented by subjective considerations and expert judgement. In addition, Calpe is mindful that trends that have affected development of liabilities in the past may not necessarily occur or affect liability development to the same degree in the future. Owing to the inherent uncertainties in the process of establishing these liabilities, the actual ultimate loss from a claim is likely to differ, perhaps materially, from the liability initially recorded.

The uncertainty inherent in estimating IBNR relating to unexpired periods of coverage is exacerbated by the application of the same underlying valuation techniques to the calculation of technical provisions in respect of unexpired periods of coverage.

With respect to unexpired periods of coverage, Calpe's loss reserves include exposure to extreme or exceptional events, both natural and man-made. Unexpired periods of coverage relating to the motor contracts of Calpe cover unpredictable events, including exposures to natural catastrophes such as:

- catastrophic hurricanes;
- windstorms;
- tornadoes;
- earthquakes;
- floods; and
- other natural disasters;

and man-made catastrophes such as:

- fires;
- industrial explosions;
- riots; and
- other man-made disasters, including those that may result from terrorist activity.

Management expects that the loss experience of Calpe will include infrequent events of great severity from time to time and the occurrence of losses from such events could cause some volatility in the financial results of Calpe.

The frequency and severity of catastrophe losses are inherently unpredictable. Insured losses arising out of a single occurrence have the potential to impact a wide range of lines of business.

The severity of catastrophe losses is subject to a high level of uncertainty arising out of extremely complex causation and coverage issues, which can include:

- attribution of losses to different perils;
- potential legal and regulatory developments related to losses; and
- inflation in repair costs owing to the limited availability of labour and materials after the occurrence of catastrophic events.

With respect to discounting for the time value of money, the difficulty inherent in estimating the currency and timing of future cash flows, including tail factors for long-tail classes of business, contribute to the risk of adverse deviation in the technical provisions of Calpe.

Sensitivity analysis for technical provisions

The following table considers sensitivities on the key assumptions underlying the technical provisions and shows the percentage change in net technical provisions for each of these sensitivities.

Figure 23: Technical provision sensitivities

	Exchange Rates		Interest Rates		Reserving Assumptions*
Key assumptions	10%	-10%	1%	-1%	5%
Technical provisions	1%	-1%	2%	-2%	16%

* This sensitivity includes 5% uplift to the gross ULR assumptions and allows for reinsurance recoveries and the impact on sliding scale commissions.

Exclusions from technical provisions

There are a number of additional aspects of the Solvency II regime that firms can apply for.

Matching adjustment

Calpe does not use the matching adjustment within the calculation of technical provisions.

Volatility adjustment

The volatility adjustment to risk free rates is not used by Calpe in the calculation of technical provisions.

Transitional measures to technical provisions (TMTP)

Calpe does not apply any transitional arrangements to the Solvency II balance sheet.

Changes in assumptions since prior period

There have been no material changes to relevant assumptions since the prior period.

D.3 Other liabilities

The material classes of other liabilities shown on Calpe's Solvency II balance sheet, their Solvency II values and corresponding values shown in the Financial Statements are summarised in the table below.

Figure 24: Other liabilities – IFRS & Solvency II reconciliation

£'000s	Solvency II	Financial Statements	Difference
Insurance and intermediaries payables	961	1,042	(81)
Reinsurance payables	1,270	13,131	(11,861)
Payables (trade, not insurance)	614	704	(90)
Total other liabilities	**2,845**	**14,877**	**(12,032)**
Total technical provisions	151,808	186,319	(34,511)
Total liabilities	**154,653**	**201,196**	**(46,543)**

The following sections provide further details on the specific valuation policies that Calpe has applied to produce its Solvency II balance sheet.

(Re)insurance and intermediaries payable

Please see Section D1 (Re)insurance and Intermediaries Receivable.

Other payables (trade not insurance)

Please see Section D1 Other Receivables (Trade not Insurance)

Provisions

Other than technical provisions, Calpe held no provisions in its financial statements or on its Solvency II balance sheet as at 31 December 2018.

Contingent liabilities

Calpe's does not consider any contingent liabilities to exist as at 31 December 2018.

Employee benefits

Calpe does not consider any employee benefit liabilities to exist as at 31 December 2018.

Aggregation of liabilities

Calpe does not aggregate liabilities into material classes other than those reported in the balance sheet QRT 02.01.02 in Appendix 2.

Technical provisions

For a detailed description of the valuation differences for the technical provisions between IFRS and Solvency II, please refer to Section D2. There were no changes made to the recognition and valuation bases used or on estimations during the reporting period

D.4 Alternative methods for valuation

Calpe does not use any alternative valuation methodologies.

D.5 Any other information

Calpe does not consider there is any other material information to disclose on its valuation for solvency purposes.

E. Capital management

E.1 Own funds

Calpe's own funds comprise mostly of ordinary paid-up share capital which are classified as a Tier 1 own funds.

In addition, Calpe recognises a reconciliation reserve of circa £1,283k, which is classified as Tier 1 and a deferred tax asset of £264k, which is classified as Tier 3.

As at 31 December 2018, the available own funds of Calpe were as follows:

Figure 25: Eligible own funds by tier

Tier	Instruments	At 31 December (£'000s) 2018	2017
Tier 1	Ordinary paid up share capital	30	30
	Share premium related to ordinary share capital	29,970	29,970
	Reconciliation reserve	1,283	(254)
Tier 2	N/A	-	-
Total own funds to cover MCR		**31,283**	**29,746**
Tier 3	Net deferred tax asset	264	309
Total Own funds to cover SCR		**31,547**	**30,055**

As at 31 December 2018, Calpe had no ancillary own funds.

Every quarter Calpe reviews its own funds against the MCR and SCR requirements. The review is undertaken by the Risk Management function and is presented to the Risk & Audit Committee as part of the ongoing review process. Included in the analysis is a forward looking review that takes into consideration Calpe's three year planning horizon.

As at 31 December 2018 Calpe's own funds were £31,547k (2017: £30,055k), representing an increase of £1,492k.

As set out in Calpe's Articles of Association, the Directors have the ability to cancel any dividend or other distribution at any time before actual payment if they consider that payment of the dividend or other distribution would cause Calpe to fail to meet any applicable capital or solvency requirement, including its Solvency Capital Requirement.

The reconciliation reserve of £1,283k is calculated below and is dependent on the level of excess assets over liabilities, the values of Ordinary Share Capital and Deferred Tax Assets. The reconciliation reserve is not considered to be significantly volatile; however, the potential for volatility does exist and is discussed in the sensitivity analyses provided in sections C.7 and D.2 of this report.

Figure 26: Reconciliation Reserve

Reconciliation Reserve	At 31 December (£'000s) 2018	2017
Excess of assets over liabilities	**31,547**	**30,055**
Less:		
Ordinary share capital	(30,000)	(30,000)
Deferred tax asset	(264)	(309)
Reconciliation reserve	**1,283**	**(254)**

Below is an explanation of material differences between the net assets in the Financial Statements and the excess of assets over liabilities as calculated for solvency purposes:

Figure 27: IFRS net assets to Solvency II reconciliation as at 31 December

	2018 (£'000s)	
IFRS net assets	**33,919**	
Change in:		
Net DAC	(1,656)	Valued at nil under Solvency II
Insurance receivables	(17,614)	Estimated premium and Contingent Commission Reserve not yet due moved to TPs
Reinsurance recoverables	(29,791)	Adjustment from reinsurer's share of IFRS insurance reserves to Solvency II TPs
Other receivables	(118)	Prepaid insurance related expenses not yet due moved to TP's
Reinsurance payables	11,943	Accrued premium and Contingent Commission Reserve not yet due moved to TPs
Other payables	90	Accrued insurance related expenses not yet due moved to TPs
Technical provisions	36,910	Adjustment from IFRS insurance reserves to Solvency II TPs
Risk Margin	(2,400)	Inclusion of Solvency II Risk Margin
Deferred tax asset	264	Pre-tax change in Net Assets x 10% deferred tax rate
Solvency II Net Assets	**31,547**	

The principal differences between the IFRS and Solvency II own funds are due to differences in technical provisions, including the removal of DAC and the inclusion of the risk margin. The differences in (re)insurance payables and receivables and other payables are due to the removal of accruals and/or contingent commission reserves, which are contained within the Solvency II technical provisions.

Please see Section D1 for further information on the valuation of assets under Solvency II and section D2 for a reconciliation between the IFRS and Solvency II technical provisions.

Calpe has not applied to use any transitional measures for the calculation of own funds. Grandfathering is not required because all own funds items meet the Solvency II classification criteria.

Calpe does not voluntarily disclose any other solvency ratios other than those reported on the own funds QRT (S.23.01).

E.2 SCR and MCR

Based on the business plan and strategic initiatives outlined above, and using the Solvency II Standard Formula to calculate its SCR, Calpe's Solvency II capital requirements are outlined below.

Figure 28: Solvency II capital requirements at 31 December 2018

	2018 (£'000)	2017 (£'000)
Eligible Own Funds to cover SCR	31,547	30,055
Eligible Own Funds to cover MCR	31,283	29,746
Minimum Capital Requirement	5,713	6,498
Basic Solvency Capital Requirement	18,380	21,879
Operational risk	4,474	4,112
Solvency Capital Requirement	**22,854**	**25,991**
Market risk	3,234	2,678
Counterparty default risk	5,793	5,135
Life underwriting risk	6	0
Health underwriting risk	0	0
Non-life underwriting risk	13,561	17,947
less Diversification	(4,214)	(3,881)
Basic Solvency Capital Requirement	**18,380**	**21,879**
Non-life catastrophe risk	647	211
Non-life premium & reserve risk	13,384	17,890
Non-life lapse risk	146	363
less Diversification	(616)	(517)
Non-life underwriting risk	**13,561**	**17,947**

Calpe's SCR ratio as at 31 December 2018 was 138%. This compares to the SCR ratio as at 31 December 2017 of 116%. Calpe's MCR ratio also increased from 458% in 2017 to 548% as at 31 December 2018. The changes in the SCR and MCR were due to the reduction in the premium and reserve risk values.

Calpe does not use any undertaking specific parameters in the calculation of the SCR.

Simplifications have been used only where specified in the Solvency II Delegated Acts. The simplifications used by Calpe are listed below:

- Article 107: simplified calculation of the risk mitigating effect for reinsurance arrangements or securitisation.
- Article 111: simplified calculation of the risk mitigating effect.
- Article 112: simplified calculation of the risk adjusted value of collateral to take into account the economic effect of the collateral.

No other simplifications are used by Calpe in the calculation of the SCR.

Calculation of the MCR

In order to calculate its MCR, Calpe uses written premiums on an IFRS basis split by Solvency II line of business.

The inputs applied to the calculation of the MCR are made up of the technical provisions (excluding the risk margin) and net written premiums over the last year (for line of business), together with the prescribed minimum (or “absolute floor”) and the most recently calculated SCR.

During the year there were decreases in Calpe’s SCR and MCR as shown in Figure 28. There have been no changes to Calpe’s business or operations, which would have resulted in a material change to the MCR or SCR calculation.

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

Calpe does not use the duration-based equity risk sub module to calculate the SCR.

E.4 Differences between the standard formula and any internal model used

Calpe does not use an internal model to calculate the SCR.

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

There have been no instances of non-compliance with the MCR and SCR by Calpe during 2018.

E.6 Any other information

There is no other material information for Calpe to report regarding capital management.

Appendix 1: Abbreviations used in this report

A.M. Best	A.M. Best Company, Inc. and/or its affiliates
Alleghany	Alleghany Corporation
Artex	Artex Risk Solutions (Gibraltar) Limited
BCP	Business Continuity Planning
BEL	Best Estimate Liabilities
BF	Bornhuetter-Ferguson
BlackRock	BlackRock, Inc and BlackRock Investment Management (UK) Limited
bps	Basis points (0.01%)
Calpe	Calpe Insurance Company Limited
CCD	Corporate Compliance Department
CFO	Chief Financial Officer
CPD	Continuing Professional Development
CRC	Counterparty & Retrocession Risk Committee
CRMC	Corporate Risk Management Committee
CRO	Chief Risk Officer
DAC	Deferred Acquisition Costs
EIOPA	European Insurance and Occupational Pensions Authority
ELR	Expected Loss Ratio
ENIDs	Events not in Data
EPIFP	Expected Profit included in Future Premiums
ERM	Enterprise Risk Management
EU	European Union
Fitch	Fitch Ratings, Inc., Fitch Ratings, Ltd. and its subsidiaries
GBP	Great Britain Pound Sterling
GFSC	Gibraltar Financial Services Commission
GRM	Global Risk Management
GWP	Gross Written Premium
HR	Human Resources
IBNER	Incurred but not Enough Reported
IBNR	Incurred but not Reported
IFRS	International Financial Reporting Standards
iNED	Independent Non-executive Director
ICE	ICE Services
IT	Information Technology
KYC	Know Your Counterparty
LAE	Loss Adjustment Expenses
LDF	Loss Development Factors
LLP	Limited Liability Partnership
LOUB	Legally Obliged Unincepted Business
LRC	Local Risk Committee
LTF	Loss Trend Factors
MCR	Minimum Capital Requirement
Moody's	Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their affiliates
NEAM	New England Asset Management

NED	Non-executive Director
ORSA	Own Risk and Solvency Assessment
QRT	Quantitative Reporting Template
QS	Quota Share
RSR	Regular Supervisory Report
S&P	Standard & Poor's Financial Services LLC and/or its affiliates
SCR	Solvency Capital Requirement
SFCR	Solvency and Financial Condition Report
SII	Solvency II Directive
SLA	Service Level Agreement
TMTP	Transitional Measures to Technical Provisions
TPs	Technical Provisions
TransRe	Collective term for TRH, its subsidiaries, branches and representatives
TRC	Transatlantic Reinsurance Company
TRC Guarantee	The guarantee described in Section B1
TRH	Transatlantic Holdings, Inc.
TRL	TransRe London Limited
TRL Quota Share	The quota share reinsurance agreement described in Section B1
TRLS	TransRe London Services Limited
UK	United Kingdom
UPR	Unearned Premium Reserve
US or USA	United States of America
USD	United States of America Dollar

Appendix 2: Public Quantitative Reporting Templates (QRT)

Templates		
S.01.02	General information	Other information
S.02.01.02	Balance Sheet	Relevant element*
S.05.01.02	Premiums, claims and expenses by line of business	Other information
S.05.02.01	Premiums, claims and expenses by country	Other information
S.17.01.02	Non-Life Technical Provisions	Relevant element*
S.19.01.21	Non-life insurance claims	Other information
S.23.01.01	Own funds	Relevant element*
S.25.01.21	Solvency Capital Requirement - for undertakings on Standard Formula	Relevant element
S.28.01.01	Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity	Relevant element*

S.02.01.02

Balance sheet

		Solvency II value
	Assets	C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	264
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	53,878
R0080	*Property (other than for own use)*	0
R0090	*Holdings in related undertakings, including participations*	0
R0100	*Equities*	0
R0110	*Equities - listed*	0
R0120	*Equities - unlisted*	0
R0130	*Bonds*	53,878
R0140	*Government Bonds*	18,832
R0150	*Corporate Bonds*	35,046
R0160	*Structured notes*	0
R0170	*Collateralised securities*	0
R0180	*Collective Investments Undertakings*	0
R0190	*Derivatives*	0
R0200	*Deposits other than cash equivalents*	0
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	0
R0240	*Loans on policies*	0
R0250	*Loans and mortgages to individuals*	0
R0260	*Other loans and mortgages*	0
R0270	Reinsurance recoverables from:	116,255
R0280	*Non-life and health similar to non-life*	115,948
R0290	*Non-life excluding health*	115,948
R0300	*Health similar to non-life*	0
R0310	*Life and health similar to life, excluding index-linked and unit-linked*	307
R0320	*Health similar to life*	0
R0330	*Life excluding health and index-linked and unit-linked*	307
R0340	*Life index-linked and unit-linked*	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	7,756
R0370	Reinsurance receivables	3,772
R0380	Receivables (trade, not insurance)	17
R0390	Own shares (held directly)	0
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	4,258
R0420	Any other assets, not elsewhere shown	0
R0500	**Total assets**	186,200

S.02.01.02

Balance sheet

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions - non-life	151,495
R0520	*Technical provisions - non-life (excluding health)*	151,495
R0530	*TP calculated as a whole*	0
R0540	*Best Estimate*	149,095
R0550	*Risk margin*	2,400
R0560	*Technical provisions - health (similar to non-life)*	0
R0570	*TP calculated as a whole*	0
R0580	*Best Estimate*	0
R0590	*Risk margin*	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	313
R0610	*Technical provisions - health (similar to life)*	0
R0620	*TP calculated as a whole*	0
R0630	*Best Estimate*	0
R0640	*Risk margin*	0
R0650	*Technical provisions - life (excluding health and index-linked and unit-linked)*	313
R0660	*TP calculated as a whole*	0
R0670	*Best Estimate*	313
R0680	*Risk margin*	0
R0690	Technical provisions - index-linked and unit-linked	0
R0700	*TP calculated as a whole*	0
R0710	*Best Estimate*	0
R0720	*Risk margin*	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	0
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	0
R0780	Deferred tax liabilities	0
R0790	Derivatives	0
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	961
R0830	Reinsurance payables	1,270
R0840	Payables (trade, not insurance)	614
R0850	Subordinated liabilities	0
R0860	*Subordinated liabilities not in BOF*	0
R0870	*Subordinated liabilities in BOF*	0
R0880	Any other liabilities, not elsewhere shown	0
R0900	**Total liabilities**	154,653
R1000	**Excess of assets over liabilities**	31,547

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
	Premiums written																	
R0110	Gross - Direct Business	0	0	0	69,239	12,219	0	0	5,072	0	0	0	0					86,530
R0120	Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0	0	0	0	0	0					0
R0130	Gross - Non-proportional reinsurance accepted													0	0	0	0	0
R0140	Reinsurers' share	0	0	0	57,634	10,171	0	0	4,172	0	0	0	0	0	0	0	0	71,977
R0200	Net	0	0	0	11,605	2,048	0	0	900	0	0	0	0	0	0	0	0	14,553
	Premiums earned																	
R0210	Gross - Direct Business	0	0	0	73,592	12,987	0	0	1,465	0	0	0	0					88,044
R0220	Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0	0	0	0	0	0					0
R0230	Gross - Non-proportional reinsurance accepted													0	0	0	0	0
R0240	Reinsurers' share	0	0	0	59,817	10,556	0	0	1,204	0	0	0	0	0	0	0	0	71,577
R0300	Net	0	0	0	13,775	2,431	0	0	261	0	0	0	0	0	0	0	0	16,467
	Claims incurred																	
R0310	Gross - Direct Business	0	0	0	55,575	9,807	0	0	843	0	0	0	0					66,225
R0320	Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0	0	0	0	0	0					0
R0330	Gross - Non-proportional reinsurance accepted													0	0	0	0	0
R0340	Reinsurers' share	0	0	0	45,975	8,113	0	0	699	0	0	0	0	0	0	0	0	54,787
R0400	Net	0	0	0	9,600	1,694	0	0	144	0	0	0	0	0	0	0	0	11,438
	Changes in other technical provisions																	
R0410	Gross - Direct Business																	0
R0420	Gross - Proportional reinsurance accepted																	0
R0430	Gross - Non-proportional reinsurance accepted																	0
R0440	Reinsurers' share																	0
R0500	Net	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
R0550	**Expenses incurred**	0	0	0	3,400	600	0	0	111	0	0	0	0	0	0	0	0	4,111
R1200	**Other expenses**																	
R1300	**Total expenses**																	4,111

S.05.02.01

Premiums, claims and expenses by country

Non-life

		C0010	C0020	C0030	C0040	C0050	C0060	C0070
		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations			Top 5 countries (by amount of gross premiums written) - non-life obligations		Total Top 5 and home country
R0010			GB					
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
	Premiums written							
R0110	Gross - Direct Business	0	78,906	0	0	0	0	78,906
R0120	Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0
R0130	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0140	Reinsurers' share	0	65,751	0	0	0	0	65,751
R0200	Net	0	13,155	0	0	0	0	13,155
	Premiums earned							
R0210	Gross - Direct Business	0	77,224	0	0	0	0	77,224
R0220	Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0
R0230	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0240	Reinsurers' share	0	62,710	0	0	0	0	62,710
R0300	Net	0	14,514	0	0	0	0	14,514
	Claims incurred							
R0310	Gross - Direct Business	0	58,067	0	0	0	0	58,067
R0320	Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0
R0330	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0340	Reinsurers' share	0	48,147	0	0	0	0	48,147
R0400	Net	0	9,920	0	0	0	0	9,920
	Changes in other technical provisions							
R0410	Gross - Direct Business	0	0	0	0	0	0	0
R0420	Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0
R0430	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0440	Reinsurers' share	0	0	0	0	0	0	0
R0500	Net	0	0	0	0	0	0	0
R0550	**Expenses incurred**	0	3,764	0	0	0	0	3,764
R1200	**Other expenses**							0
R1300	**Total expenses**							3,764

S.12.01.02

Life and Health SLT Technical Provisions

		Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, including Unit-Linked)	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
				Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees					Contracts without options and guarantees	Contracts with options or guarantees			
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
R0010	**Technical provisions calculated as a whole**									0	0						0
R0020	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	0						0
	Technical provisions calculated as a sum of BE and RM																
	Best estimate																
R0030	**Gross Best Estimate**								313	0	313						0
R0080	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default								308	0	308						0
R0090	Best estimate minus recoverables from reinsurance/SPV and Finite Re	0		0	0		0	0	5	0	5		0	0	0	0	0
R0100	**Risk margin**								0	0	0						0
	Amount of the transitional on Technical Provisions																
R0110	Technical Provisions calculated as a whole										0						0
R0120	Best estimate										0						0
R0130	Risk margin										0						0
R0200	**Technical provisions - total**	0	0			0			313	0	313	0			0	0	0

S.17.01.02

Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance												Accepted non-proportional reinsurance				
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	Total Non-Life obligation
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
R0010	**Technical provisions calculated as a whole**	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
R0050	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
	Technical provisions calculated as a sum of BE and RM																	
	Best estimate																	
	Premium provisions																	
R0060	Gross	0	0	0	13,456	2,375	0	0	574	0	0	0	0	0	0	0	0	16,405
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	0	0	13,379	2,361	0	0	704	0	0	0	0	0	0	0	0	16,444
R0150	**Net Best Estimate of Premium Provisions**	0	0	0	77	14	0	0	-130	0	0	0	0	0	0	0	0	-39
	Claims provisions																	
R0160	Gross	0	0	0	112,086	19,780	0	0	826	0	0	0	0	0	0	0	0	132,692
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	0	0	84,233	14,865	0	0	406	0	0	0	0	0	0	0	0	99,504
R0250	**Net Best Estimate of Claims Provisions**	0	0	0	27,853	4,915	0	0	420	0	0	0	0	0	0	0	0	33,188
R0260	**Total best estimate - gross**	0	0	0	125,542	22,155	0	0	1,400	0	0	0	0	0	0	0	0	149,097
R0270	**Total best estimate - net**	0	0	0	27,930	4,929	0	0	290	0	0	0	0	0	0	0	0	33,149
R0280	**Risk margin**	0	0	0	2,022	357	0	0	21	0	0	0	0	0	0	0	0	2,400
	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**	0	0	0	127,564	22,512	0	0	1,421	0	0	0	0	0	0	0	0	151,497
R0330	**Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total**	0	0	0	97,612	17,226	0	0	1,110	0	0	0	0	0	0	0	0	115,948
R0340	**Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total**	0	0	0	29,952	5,286	0	0	311	0	0	0	0	0	0	0	0	35,549

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Non-Life insurance claims

Total Non-life business

Z0020 Accident year / underwriting year: Underwriting Year

Gross Claims Paid (non-cumulative)

(absolute amount)

		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
	Year	Development year											In Current year	Sum of years (cumulative)
		0	1	2	3	4	5	6	7	8	9	10 & +		
R0100	Prior											0	0	0
R0160	2009	0	0	0	0	0	0	0	0	0	0		0	0
R0170	2010	0	0	0	0	0	0	0	0	0			0	0
R0180	2011	292	4,441	4,664	2,141	1,268	539	261	1,100				1,100	14,707
R0190	2012	1,491	6,416	3,286	1,550	973	908	1,116					1,116	15,740
R0200	2013	1,450	6,877	6,381	2,533	1,770	1,335						1,335	20,346
R0210	2014	5,579	17,734	9,994	10,685	5,415							5,415	49,407
R0220	2015	7,757	17,816	9,965	4,958								4,958	40,496
R0230	2016	4,524	23,507	14,745									14,745	42,776
R0240	2017	2,967	21,500										21,500	24,467
R0250	2018	3,095											3,095	3,095
R0260												Total	53,264	211,034

Gross Undiscounted Best Estimate Claims Provisions

(absolute amount)

		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
	Year	Development year											Year end (discounted data)
		0	1	2	3	4	5	6	7	8	9	10 & +	
R0100	Prior											0	0
R0160	2009	0	0	0	0	0	0	0	0	0	0		0
R0170	2010	0	0	0	0	0	0	0	0	0			0
R0180	2011	1,086	5,790	6,394	3,714	2,089	1,998	2,473	2,204				2,188
R0190	2012	4,399	9,067	5,384	3,335	2,161	1,114	438					435
R0200	2013	7,768	12,902	10,514	7,222	3,455	2,599						2,565
R0210	2014	11,730	21,954	29,237	22,397	15,729							15,478
R0220	2015	14,546	34,062	25,839	20,959								20,608
R0230	2016	23,104	46,977	38,542									37,870
R0240	2017	20,785	38,821										38,303
R0250	2018	15,498											15,244
R0260												Total	132,691

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Own Funds

	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
R0010	Ordinary share capital (gross of own shares)	30	30		0	
R0030	Share premium account related to ordinary share capital	29,970	29,970		0	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0070	Surplus funds	0	0			
R0090	Preference shares	0		0	0	0
R0110	Share premium account related to preference shares	0		0	0	0
R0130	Reconciliation reserve	1,283	1,283			
R0140	Subordinated liabilities	0		0	0	0
R0160	An amount equal to the value of net deferred tax assets	264				264
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
R0220	**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**	0				
R0230	**Deductions for participations in financial and credit institutions**	0				
R0290	**Total basic own funds after deductions**	31,547	31,283	0	0	264
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0				
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0				
R0320	Unpaid and uncalled preference shares callable on demand	0				
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0				
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0				
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0390	Other ancillary own funds	0				
R0400	**Total ancillary own funds**	0			0	0
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	31,547	31,283	0	0	264
R0510	Total available own funds to meet the MCR	31,283	31,283	0	0	
R0540	Total eligible own funds to meet the SCR	31,547	31,283	0	0	264
R0550	Total eligible own funds to meet the MCR	31,283	31,283	0	0	
R0580	**SCR**	22,854				
R0600	**MCR**	5,713				
R0620	**Ratio of Eligible own funds to SCR**	138.03%				
R0640	**Ratio of Eligible own funds to MCR**	547.52%				

	Reconcilliation reserve	C0060
R0700	Excess of assets over liabilities	31,547
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	
R0730	Other basic own fund items	30,264
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0760	**Reconciliation reserve**	1,283
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	0
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	1,860
R0790	**Total Expected profits included in future premiums (EPIFP)**	1,860

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Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	3,234		
R0020	Counterparty default risk	5,793		
R0030	Life underwriting risk	6		
R0040	Health underwriting risk	0		
R0050	Non-life underwriting risk	13,561		
R0060	Diversification	-4,214		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	18,380		

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	4,474
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	0
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency Capital Requirement excluding capital add-on**	22,854
R0210	Capital add-ons already set	0
R0220	**Solvency capital requirement**	22,854
	Other information on SCR	
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

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

Linear formula component for non-life insurance and reinsurance obligations

		C0010
R0010	MCR_{NL} Result	4,231

		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
R0030	Income protection insurance and proportional reinsurance	0	0
R0040	Workers' compensation insurance and proportional reinsurance	0	0
R0050	Motor vehicle liability insurance and proportional reinsurance	27,930	13,010
R0060	Other motor insurance and proportional reinsurance	4,929	2,296
R0070	Marine, aviation and transport insurance and proportional reinsurance	0	0
R0080	Fire and other damage to property insurance and proportional reinsurance	0	0
R0090	General liability insurance and proportional reinsurance	289	480
R0100	Credit and suretyship insurance and proportional reinsurance	0	0
R0110	Legal expenses insurance and proportional reinsurance	0	0
R0120	Assistance and proportional reinsurance	0	0
R0130	Miscellaneous financial loss insurance and proportional reinsurance	0	0
R0140	Non-proportional health reinsurance	0	0
R0150	Non-proportional casualty reinsurance	0	0
R0160	Non-proportional marine, aviation and transport reinsurance	0	0
R0170	Non-proportional property reinsurance	0	0

Linear formula component for life insurance and reinsurance obligations

		C0040
R0200	MCR_{L} 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	0	
R0220	Obligations with profit participation - future discretionary benefits	0	
R0230	Index-linked and unit-linked insurance obligations	0	
R0240	Other life (re)insurance and health (re)insurance obligations	5	
R0250	Total capital at risk for all life (re)insurance obligations		0

Overall MCR calculation

		C0070
R0300	Linear MCR	4,232
R0310	SCR	22,854
R0320	MCR cap	10,284
R0330	MCR floor	5,713
R0340	Combined MCR	5,713
R0350	Absolute floor of the MCR	3,300
R0400	**Minimum Capital Requirement**	5,713