TransRe
We value risk.

TransRe London Limited

Solvency and Financial Condition Report

As at 31 December 2018

Table of contents

About this document

This document is the Solvency and Financial Condition Report ("SFCR") for TransRe London Limited ("TRL") as at 31 December 2018.

This SFCR covers TRL on a solo basis.

TRL's functional and presentational currency is US dollars ("USD").

Directors' statement

The Directors are responsible for preparing the SFCR in accordance with the Prudential Regulatory Authority ("PRA") rules and Solvency II ("SII") Regulations.

Rule 6.1(2) within the Reporting Part of the PRA Rulebook for SII firms requires that TRL have a written policy ensuring the ongoing appropriateness of any information disclosed. Rule 6.2(1) requires TRL to ensure that its SFCR is subject to approval by its Board of Directors.

Each of the Directors, whose names and functions are listed in Section B1 of this SFCR, confirms that, to the best of his knowledge:

- throughout the financial year in question, TRL has complied; and
- it is reasonable to believe that, at the date of the publication of the SFCR, TRL continues to comply, and will continue to comply in future,

in all material respects, with the requirements of the PRA rules and SII Regulations as modified by a written notice from the PRA, effective 31 December 2018, as disclosed in Section E of this SFCR.

On behalf of the Board

D.C. Radford

David Radford
Chief Financial Officer
05 April 2019

Auditor’s report

Report of the independent external auditor to the Directors of TransRe London Limited (‘the Company’) pursuant to Rule 4.1(2) of the External Audit Part of the PRA Rulebook applicable to Solvency II firms

Report on the Audit of the relevant elements of the Solvency and Financial Condition Report

Opinion

Except as stated below, we have audited the following documents prepared by the Company as at 31 December 2018:

- The ‘Valuation for solvency purposes’ and ‘Capital management’ sections of the Solvency and Financial Condition Report of the Company as at 31 December 2018, (‘the Narrative Disclosures subject to audit’); and
- Company templates S.02.01.02, S.17.01.02, S.23.01.01, S.28.01.01 (‘the Templates subject to audit’).

The Narrative Disclosures subject to audit and the Templates subject to audit are collectively referred to as the ‘relevant elements of the Solvency and Financial Condition Report’

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

- information contained within the relevant elements of the Solvency and Financial Condition Report set out about above which are, or derive from the Solvency Capital Requirement, as identified in the Appendix to this report;
- The ‘Business and Performance’, ‘System of Governance’ and ‘Risk profile’ elements of the Solvency and Financial Condition Report;
- Company templates S.05.01.02, S.05.02.01, S.19.01.21, S.25.02.21; and
- the written acknowledgement by management of their responsibilities, including for the preparation of the Solvency and Financial Condition Report (‘the Responsibility Statement’).

To the extent the information subject to audit in the relevant elements of the Solvency and Financial Condition Report includes amounts that are totals, sub-totals or calculations derived from the Other Information, we have relied without verification on the Other Information.

In our opinion, the information subject to audit in the relevant elements of the Solvency and Financial Condition Report of TransRe London Limited as at 31 December 2018 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

Basis for opinion

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

Conclusions relating to going concern

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the Directors' use of the going concern basis of accounting in the preparation of the Solvency and Financial Condition Report is not appropriate; or
- the Directors have not disclosed in the Solvency and Financial Condition Report any identified material uncertainties that may cast significant doubt about the company's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from the date when the Solvency and Financial Condition Report is authorised for issue.

Emphasis of Matter – Basis of Accounting & Restriction on Use

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

This report is made solely to the Directors of the Company in accordance with Rule 2.1 of External Audit Part of the PRA Rulebook for Solvency II firms. Our work has been undertaken so that we might report to the Directors those matters that we have agreed to state to them in this report and for no other purpose.

Our opinion is not modified in respect of this matter.

Other Information

The Directors are responsible for the Other Information. Our opinion on the relevant elements of the Solvency and Financial Condition Report does not cover the Other Information and, we do not express an audit opinion or any form of assurance conclusion thereon.

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

Responsibilities of Directors for the Solvency and Financial Condition Report

The Directors are responsible for the preparation of the Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations on which they are based which have been supplemented by the approval made by the PRA under Regulation 48 of the Solvency II Regulations 2015 referred to in E.2.

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

Auditor's Responsibilities for the Audit of the relevant elements of the Solvency and Financial Condition Report

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

Our objectives are to obtain reasonable assurance about whether the relevant elements of the Solvency and Financial Condition Report are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decision making or the judgement of the users taken on the basis of the Solvency and Financial Condition Report

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: https://www.frc.org.uk/Our-Work/Audit-and-Actuarial-Regulation/Audit-and-assurance/Standards-and-guidance/Standards-and-guidance-for-auditors/Auditors-responsibilities-for-audit/Description-of-auditors-responsibilities-for-audit.aspx. The same responsibilities apply to the audit of the Solvency and Financial Condition Report.

Other Matter

The Company has authority to calculate its Solvency Capital Requirement using a Partial Internal Model ("the Model") approved by the Prudential Regulation Authority in accordance with the Solvency II Regulations 2015. In forming our opinion and in accordance with PRA Rules, we are not required to audit the inputs to, design of, operating effectiveness of and outputs from the Model, or whether the Model is being applied in accordance with the Company's application or approval order.

Report on Other Legal and Regulatory Requirements

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

Ernst + Young LLP

Ernst & Young LLP
London
05 April 2019

The maintenance and integrity of the TransRe London Limited website is the responsibility of the Directors; the work carried out by the auditors does not involve consideration of these matters and, accordingly, the auditors accept no responsibility for any changes that may have occurred to the Solvency and Financial Condition Report since it was initially presented on the website.

Appendix – relevant elements of the Solvency and Financial Condition Report that are not subject to audit.

The Relevant elements of the Solvency and Financial condition report that are not subject to audit comprise:

- The following elements of template S.02.01.02:
  - Row R0550: Technical provisions – non-life (excluding health) – risk margin
  - Row R0590: Technical provisions – health (similar to non-life) – risk margin
- The following elements of template S.17.01.02:
  - Row R0280: Technical provisions calculated as a sum of BE and RM – Risk margin
- The following elements of template S.23.01.01:
  - Row R0580: SCR
  - Row R0740: Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds
- The following elements of template S.28.01.01:
  - Row R0310: SCR
- Elements of the Narrative Disclosures subject to audit identified as 'unaudited'.

Executive summary

TRL is a wholly owned subsidiary of Transatlantic Reinsurance Company ("TRC") and provides the TransRe group ("TransRe") with its main platform to write business in the United Kingdom and other international regions that access the London and Lloyd's markets. TRC is domiciled in New York, USA. TRL's ultimate parent undertaking is Alleghany Corporation ("Alleghany").

TRL commenced trading on January 2014 assuming the renewals of most of TRC's London branch ("LBO") business developed since 1980. It is regulated by the PRA and FCA. In addition to paid up capital of $500m, TRL has the benefit of a 60% collateralised quota share treaty with TRC and a parental capital support guarantee agreement. TRL has also been granted the same financial strength ratings as TRC, being ratings of A+, by both S&P and A.M. Best.

TRL is a specialist non-life reinsurance company concentrating on providing protection for cedants and predominantly not competing with them in their own direct markets. Many of TRL's senior management and underwriting teams have long tenure with TransRe and we value enduring relationships with our client base.

During 2018 TRL continued to enhance its analytical, underwriting and actuarial resources to further concentrate on providing clients with top quality service, expertise and financial security in challenging market conditions; our aim is to be their reinsurer of choice. Substantial resource was allocated to the completion and submission of a partial internal model ("PIM") for natural catastrophe risk which was approved by the PRA in December 2018.

For 2019 TRL continues to focus on underwriting excellence, enhancing client relationships and navigating emerging risks and ever-changing political environments. We will also develop an enhancement to the PIM to cover man-made catastrophe risk.

Business and performance

TRL's strategy is to concentrate foremost on achieving underwriting profitability, not on adding premium volume, consistent with the group target of book value growth over time.

TRL accesses business through both broker and direct distribution channels and writes a diverse portfolio of treaty reinsurance and facultative/direct business, avoiding over-dependence on any one class. We adopt a lead approach to our business, combining technical analysis with underwriting expertise and strong cycle management. TRL purchases reinsurance protection either on a group or regional basis, in line with our risk tolerances, to manage volatility within our Solvency Capital Requirement ("SCR"). Our business strategy during 2018 was broadly consistent with the prior year.

TRL's assets are prudently invested to ensure it has access to funds at short notice, if required. At 31 December 2018 the investment portfolio was made up predominantly (96%) of fixed income securities with the balance (4%) invested in exchange traded funds ("ETFs"). These have been invested taking account of the liquidity requirements of TRL along with the nature and timing of insurance liabilities. Investments include:

- government bonds;
- collateralised securities;
- corporate bonds;
- ETFs; and
- cash and deposits.

Net investment income and realised investment gains (or losses) are recognised in the statement of profit and loss, while unrealised fair value adjustments are recorded in other comprehensive income, in accordance with International Financial Reporting Standards ("IFRS").

System of governance

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

TRL's Board maintains ultimate responsibility for the oversight of TRL. The Board delegates authority for day-to-day management of some aspects of the business to certain functions and committees. The Board and the committees operate under the guidance of formal terms of reference, which are agreed by the Board.

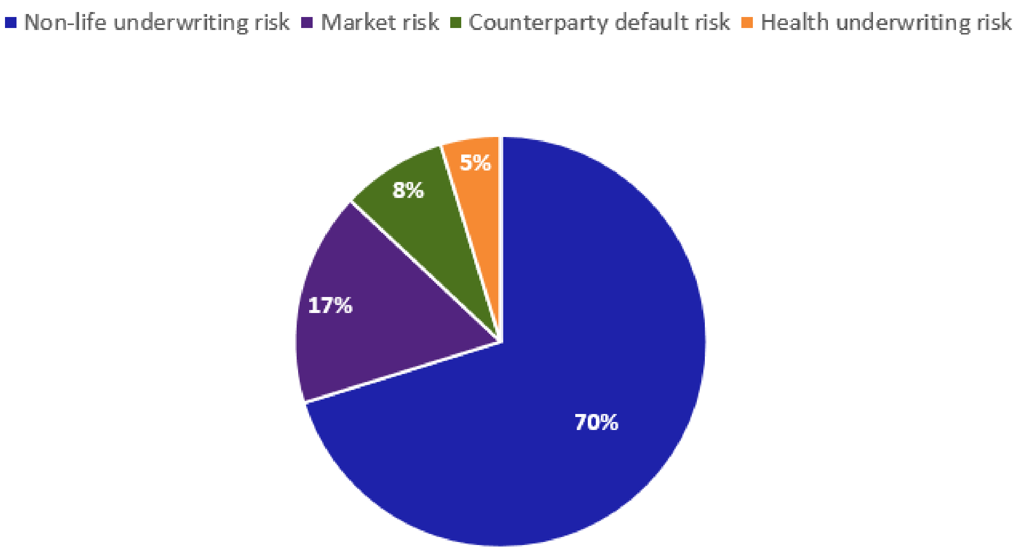
TRL adopts an approach to remuneration which supports and encourages appropriate behaviour that is aligned with TransRe's vision and values and Alleghany's Code of Business Conduct and Ethics.

The members of the Board possess the skills, knowledge and experience required in order to undertake their roles and responsibilities for overseeing TRL. With the exception of some non-material changes to reflect the implementation of the Senior Managers & Certification Regime ("SM&CR"), the system of governance of TRL has not materially changed in the year to 31 December 2018.

Risk profile

TRL underwrites a diversified portfolio of property and casualty reinsurance, across multiple regions and classes. TRL's SCR risk profile before the impact of diversification is shown in the below chart.

Figure 1: Basic SCR by risk type before the impact of diversification



As evidenced in the chart, non-life underwriting risk, including non-life premium and reserve risk make up the largest portion of the SCR risk profile.

In order to help mitigate underwriting risks, TRL maintains a disciplined underwriting philosophy that is supported by risk appetites reflecting TRL's portfolio and risk management tolerances.

TRL benefits from a comprehensive retrocession (reinsurance) programme that provides protection for TransRe globally as well as TRL specifically.

TRL undertakes detailed stress and scenario testing on a quarterly basis. Scenario tests are used to test the company's resilience against shocks from both its underwriting and non-underwriting activities. The results of the analysis showed that the most material impact on the SCR was the risk of a natural catastrophe event affecting the UK and Europe. The analysis undertaken indicates TRL is strongly capitalised and it would take an extreme event (return periods in excess of 1-in-200 years) to breach its SCR. TRL's underwriting risk profile is therefore resilient to severe shocks and is within the Board approved risk appetite.

As at 1 Jan 2019, a small part (less than 10%) of renewing TRL premium was transferred to LBO in response to client concerns about the possible impact of a 'hard' Brexit. Other business was renewed by TRL, but with a Brexit clause that could trigger a transfer to LBO, or other TransRe office in Europe, in the event of a 'hard' Brexit.

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, D2 and D3. 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 TRL 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 and a risk margin.

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.

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

TRL 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 TRL and a comparison to TRL's regulatory capital requirements (the amount of capital the firm is required to hold).

Figure 2: Own funds by tier

Tier	Instrument	At 31 December ($'000s)	
		2018	2017
Tier 1	Ordinary paid up share capital Reconciliation reserve	500,000 22,952	500,000 11,086
Tier 2	Not applicable	-	-
Total own funds to cover MCR		**522,952**	**511,086**
Tier 3	Net deferred tax asset	2,712	1,153
Total own funds to cover SCR		**525,664**	**512,239**

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

As noted above, the PRA approved TRL's PIM for natural catastrophe risk effective 31 December 2018. During the development and application period, TRL maintained a capital add-on which was removed on approval of the PIM. During 2019 TRL will develop an enhancement to the PIM to deal with man-made catastrophe risk and has agreed to maintain a smaller capital add-on until the enhancement is approved by the PRA.

Figure 3: Capital requirements

	At 31 December ($'000s)	
	2018	2017
Minimum Capital Requirement	81,161	90,868
Solvency Capital Requirement includes CAOn whilst TRL extends its PIM	324,644	363,470

Overall TRL held 162% (2017: 141%) of its SCR and 644% (2017: 562%) of its MCR at 31 December 2018.

The improved ratios were anticipated: the reduction in the SCR principally reflects the approval of the PIM, which increases the SCR by $14.7 million compared to the standard formula; but was more than offset by the removal of the corresponding capital add-on of £50 million; and the addition of the capital add-on of $15 million with respect to the planed enhancement to the PIM. The increase in own funds principally reflects retained earnings for the year.

There have been no instances of non-compliance with the MCR and SCR in the current or previous year.

There are no volatility or transitional adjustments to the relevant risk-free interest rate term structure, or transitional measures on technical provisions.

A. Business and Performance

A.1 Business

Company information

TransRe London Limited:	Corn Exchange 55 Mark Lane London EC3R 7NE Company number: 8506758 Firm Reference Number: 600544 Legal Entity Identifier: 213800AX82TXYUZAAM21
External auditors:	Ernst and Young LLP 25 Churchill Place London E14 5EY
Regulator (financial supervision):	Prudential Regulatory Authority Bank of England Threadneedle St London EC2R 8AH
Regulator (conduct supervision):	Financial Conduct Authority 12 Endeavour Square London E20 1JN

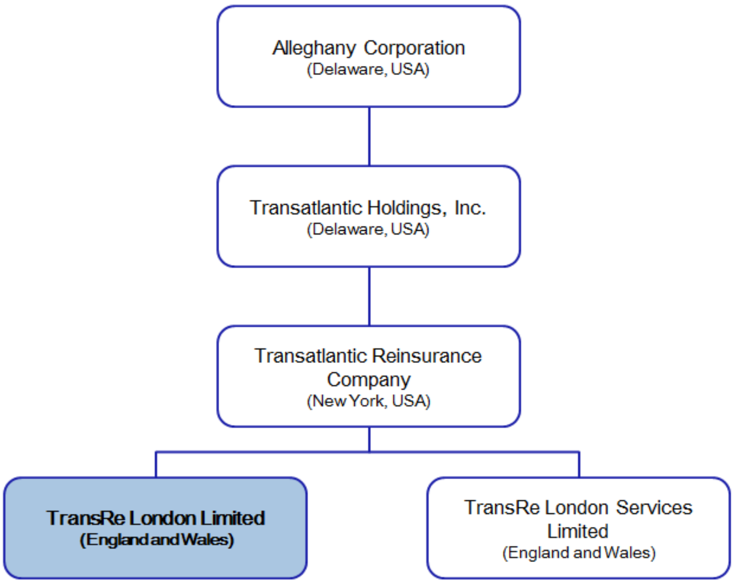
TRL is a private limited company, limited by shares, with its registered office in England. It is a wholly owned subsidiary of TRC, which is a reinsurance company domiciled in New York, USA. TRL provides TransRe with its main platform to write business in the United Kingdom and other international regions that access the London and Lloyd's markets, not otherwise served by TransRe's wider regional office distribution network. TRL is headquartered in London and commenced underwriting risks effective from 1 January 2014, assuming the renewals of most of the TRC London branch business developed since 1980.

TRL's ultimate parent undertaking is Alleghany Corporation, 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. ("TRH"), incorporated in Delaware, USA, is an indirect parent and holder of a qualifying holding in TRL.

Other than TRC, TRH and Alleghany, there are no other holders of qualifying holdings in TRL. TRL 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, New Hampshire, USA.

Figure 4: Organisational structure chart



All subsidiaries are 100% owned and controlled.

TRL offers reinsurance through treaty and facultative reinsurance arrangements covering non-life property and casualty lines of business on either a proportional or non-proportional basis. It underwrites a broad range of risks within those classes in multiple territories, thus maintaining a diversified portfolio without over-dependence on a single line of business. TRL also benefits from shared functions made available through TransRe's support and global operational infrastructure.

The core reinsurance portfolio of property and casualty treaties provides protection to cedants based globally, across a diverse range of classes. The protection provided includes coverage for a wide range of business events, enabling TRL to better navigate underwriting cycles in multiple classes of business. As part of its authorisation, TRL also holds a licence to write direct insurance business, in a limited number of classes. The direct insurance business continues to account for a very small part of TRL's property and construction portfolio and is expected to remain so for the immediate future.

TRC, together with certain of its subsidiaries including TRL, is rated A+ by both Standard & Poor's and A.M. Best.

Market commentary

Despite some improvements to terms and conditions in early 2018, these did not reach the levels hoped for and that were in TRL's business plans for the year; excess capacity remained available for most classes.

Significant market loss activity continued in the second half of 2018, with natural catastrophe events impacting both Japan (typhoons Jebi and Trami) and the US (hurricanes and wildfires). Whilst traditional catastrophe capacity has not diminished in any significant way, insurance linked securities ("ILS") markets have become more discerning in how they deploy their capital, with several cedants forced into late changes to their catastrophe protections.

Non-catastrophe loss activity also increased in 2018, with significant losses hitting marine, energy and engineering classes: the Lürssen shipyard fire is the largest ever marine hull loss at €600m; Ituango hydro power in Colombia is the largest ever construction loss, with the potential to reach $1.8bn; and the onshore energy market suffered losses totalling almost $2bn over the course of the year.

TRL does not expect a significant impact to its portfolio and surplus from the 2018 catastrophe and risk losses as we benefit from our own reinsurance protections.

TRL continues to see strong interest from clients in finding solutions for emerging risks, including cyber and socio-political classes. Our specialist teams continue to offer dedicated technical input and support as knowledge evolves. Whilst there are new risks to consider in these classes, there are also opportunities to develop new products.

As at 1 January 2019, a small part (less than 10%) of renewing TRL premium was transferred to LBO in response to client concerns about the possible impact of a 'hard' Brexit. Additionally, some other business was renewed with a Brexit clause that could trigger a transfer to LBO, or other TransRe office in Europe, in the event of a 'hard' Brexit. We continue to await political and regulatory clarity.

The official discount (Ogden) rate is expected to be reviewed following the initial cut in 2017; it is anticipated that this will be reviewed again in the second half of 2019, but in any event, it is not expected to have a material impact on the company's motor and casualty reserves.

Strategy and portfolio

TRL's strategy is to achieve long-term book value growth throughout the underwriting cycle commensurate with the TransRe group objective of being a global property/casualty reinsurer of choice, maximising the benefits of local presence and global service, writing all products in all territories.

In the current low yield investment environment, TRL's focus on underwriting profitability is paramount to support the aim of book value growth.

Premium income distribution by line of business and distribution by domicile of cedant is shown in Figures 5, 6a and 6b.

Figure 5: Solvency II line of business (gross earned premium $'000s)

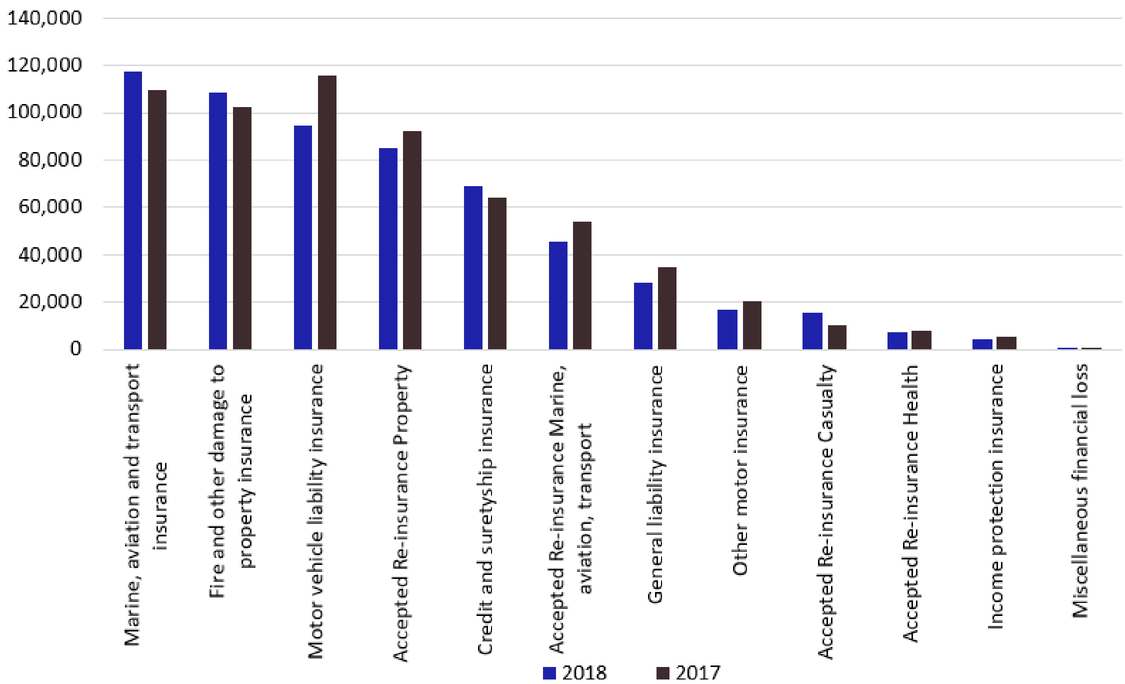


Figure 6a: Geographical domicile of cedants as at 31 December 2018

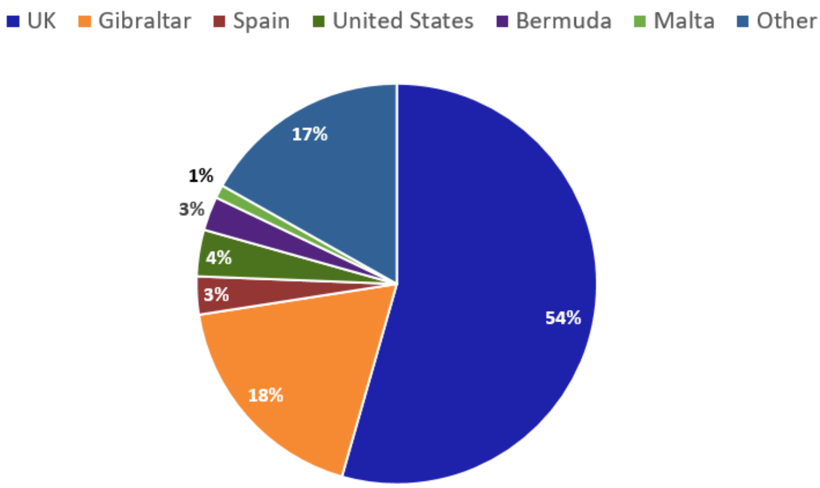
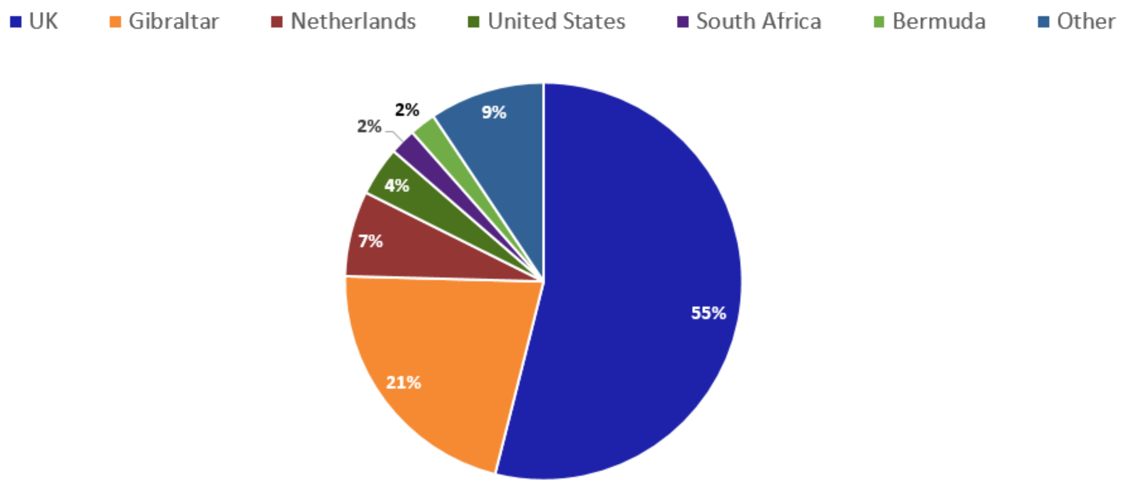


Figure 6b: Geographical domicile of cedants as at 31 December 2017



No significant new classes of business were undertaken in the current or prior year. Premium volumes in some lines varied from plan, depending on the expected profitability and contribution to TRL's business development.

A.2 Underwriting performance

TRL earned $591,676k of gross premium income in 2018 compared to $617,750k in 2017. TRL writes a diverse book of business with no one class dominating the overall portfolio. Marine, aviation and transport ("MAT") is the largest component, accounting for 20% (2017: 18%) of the total; and fire and other damage to property accounts for 18% (2017: 17%). These are closely followed by motor vehicle liability, which accounts for a further 16% (2017: 19%).

TRL is in its sixth year of operation, so some claims remain at a relatively early stage of development and therefore do not represent final results, especially on the longer tail classes. Most lines of business continue to show improvement; current claims ratios are reducing in line with expectations both on a gross and net basis and are in line with the historical experience of TRC's London branch. Acquisition costs remain a focus.

Motor market loss ratios increased in recent years and were further impacted by the change in the discount rate (Ogden rate) in 2017. This led to rising motor premiums in 2018, which are expected to remain at similar levels throughout 2019.

The storms in Japan and USA during 2018 have had less impact on industry results than those occurring in 2017. Marine business was affected by the Lürssen shipyard fire in Germany and Property suffered several large risk claims.

91% (2017: 92%) of TRL's business is generated through brokers with the remaining 9% (2017: 8%) sourced directly with cedants. As well as writing the business through these traditional sources, TransRe has developed additional distribution capabilities which are supported by TRL such as its Lloyd's Corporate Member, TReIMCo Limited (TReIMCO), and a Gibraltar operation, Calpe Insurance Company Limited ("Calpe").

Top five underwriting performance by line of business

The table below summarises the performance of TRL's top five Solvency II lines of business. Figures are presented on both a gross assumed basis and on a net basis after all outwards reinsurance, including the TRC Quota Share.

Figure 7a: Underwriting performance by SII line of business (Gross) 2018

Gross ($'000s)	Proportional			Non-proportional	Proportional	Other lines of business ("LoB")	Total
	Marine, aviation and transport insurance	Fire and other damage to property insurance	Motor vehicle liability insurance	Reinsurance property	Credit and suretyship		
Premiums written	115,979	106,680	98,148	85,356	73,766	120,581	600,510
Premiums earned	117,387	108,274	94,558	85,090	68,808	117,559	591,676
Claims incurred	(92,940)	(77,557)	(75,003)	(34,277)	(34,003)	(72,316)	(386,096)
Expenses	(42,949)	(45,391)	(24,840)	(13,845)	(34,212)	(28,124)	(189,361)
Underwriting profit/(loss)	**(18,502)**	**(14,674)**	**(5,285)**	**36,968**	**593**	**17,119**	**16,219**

Figure 7b: Underwriting performance by SII line of business (Gross) 2017

Gross ($'000s)	Proportional			Non-proportional	Proportional	Other LoB	Total
	Motor vehicle liability insurance	Fire and other damage to property insurance	Marine, aviation and transport insurance	Reinsurance property	Credit and suretyship		
Premiums written	107,824	107,073	103,602	92,761	69,146	126,599	607,005
Premiums earned	115,917	102,545	109,479	92,146	64,118	133,545	617,750
Claims incurred	(92,018)	(69,293)	(99,182)	(83,649)	(37,672)	(109,617)	(491,431)
Expenses	(27,878)	(45,841)	(48,619)	(12,280)	(28,654)	(32,593)	(195,865)
Underwriting profit/(loss)	**(3,979)**	**(12,589)**	**(38,322)**	**(3,783)**	**(2,208)**	**(8,665)**	**(69,546)**

Figure 8a: Underwriting performance by SII line of business (Net) 2018

Net ($'000s)	Proportional				Non-Proportional		
	Marine, aviation and transport insurance	Fire and other damage to property insurance	Motor vehicle liability insurance	Credit and suretyship	Reinsurance property	Other LoB	Total
Premiums written	46,392	42,626	39,259	29,508	18,051	43,579	219,415
Premiums earned	46,955	42,915	37,819	27,524	17,964	42,514	215,691
Claims incurred	(37,297)	(30,756)	(29,995)	(13,630)	(6,718)	(28,499)	(146,895)
Expenses	(16,638)	(16,804)	(9,347)	(13,529)	(5,018)	(10,496)	(71,832)
Underwriting profit/(loss)	**(6,980)**	**(4,645)**	**(1,523)**	**365**	**6,228**	**3,519**	**(3,036)**

Figure 8b Underwriting performance by SII line of business (Net) 2017

Net ($'000s)	Proportional				Non-Proportional		
	Motor vehicle liability insurance	Fire and other damage to property insurance	Marine, aviation and transport insurance	Credit and suretyship	Reinsurance property	Other LoB	Total
Premiums written	43,130	42,820	41,441	27,657	21,988	43,738	220,774
Premiums earned	46,367	41,031	43,791	25,646	22,056	46,571	225,462
Claims incurred	(36,807)	(27,717)	(39,673)	(15,040)	(19,299)	(38,597)	(177,133)
Expenses	(9,890)	(17,546)	(20,202)	(11,265)	(3,358)	(12,176)	(74,437)
Underwriting profit/(loss)	**(330)**	**(4,232)**	**(16,084)**	**(659)**	**(601)**	**(4,202)**	**(26,108)**

Marine, aviation & transport ("MAT")

Following two challenging years in 2017 and 2018, MAT is now seeing some of the highest rate increases and with normalised loss activity is expected to perform satisfactorily in 2019.

Fire & other damage to property

This portfolio comprises property proportional treaty and non-proportional contracts as well as facultative reinsurance. The 2018 results were in line with expectation despite being impacted by several large risk losses.

Motor vehicle liability

TRL writes a number of motor pro rata treaties. Results from this class of business were tempered by prior years' competitive rating environment, however original rates improved through 2017 and 2018, leading to more positive recent results.

Credit and surety

The credit and surety segment includes trade credit and political risk business. Underwriting performance in 2018 was in line with expectation.

Accepted reinsurance

The property non-proportional portfolio primarily provides catastrophe cover for our cedants dominated by UK and European exposures, with attachment thresholds at an acceptably high level. The European exposed business had a benign year and the storms in Japan and USA had marginal impact on the TRL worldwide exposed business.

As well as a diverse range of classes, TRL also writes business from companies with different domiciles, covering territorial scopes including the UK, Scandinavia, South Africa, Spain (trade credit), Malta and Gibraltar (UK motor business). The breakdown of the material geographical areas where TRL writes its business is set out is set out in the table below.

Other lines of business

Other lines of business includes accident and health, specialty, casualty and political violence. Underwriting performance in 2018 is in line with expectations.

Figure 9a: Underwriting performance by material geographical area (Net) 2018

Net ($'000s)	United Kingdom	Gibraltar	Spain	United States	Bermuda	Malta	Other countries	Total
Premiums written	101,576	43,139	15,116	8,177	7,747	6,010	37,650	219,415
Premiums earned	102,719	45,401	7,693	8,370	6,824	2,668	42,016	215,691
Claims incurred	(76,117)	(36,060)	(4,418)	(759)	(3,065)	(2,118)	(24,358)	(146,895)
Expenses	(37,412)	(10,615)	(7,567)	(2,548)	(2,759)	(1,066)	(9,865)	(71,832)
Underwriting profit/(loss)	**(10,810)**	**(1,274)**	**(4,292)**	**5,063**	**1,000**	**(516)**	**7,793**	**(3,036)**

Figure 9b: Underwriting performance by material geographical area (Net) 2017

Net ($'000s)	United Kingdom	Gibraltar	Netherlands	United States	South Africa	Other countries	Total
Premiums written	103,341	51,822	18,233	9,216	6,143	32,019	220,774
Premiums earned	107,603	56,203	18,136	8,138	5,458	29,924	225,462
Claims incurred	(85,585)	(45,182)	(9,690)	(9,995)	(7,496)	(19,185)	(177,133)
Expenses	(40,804)	(11,675)	(7,458)	(5,885)	(1,612)	(7,003)	(74,437)
Underwriting profit/(loss)	**(18,786)**	**(654)**	**988**	**(7,742)**	**(3,650)**	**3,736**	**(26,108)**

United Kingdom

Business from UK domiciled cedants makes up 48% of the TRL net earned premium (2017: 48%). The UK experienced relatively low catastrophe activity but the competitive pricing environment in most lines continued.

Gibraltar

Comprises niche private and commercial motor business where rate increases were achieved.

Spain

Comprises primarily international trade credit business with results in line with expectations.

US/Bermuda

Includes multinational ceding companies writing principally property, casualty and marine and aviation business.

Malta

Malta is predominantly UK motor business written out of a third party Maltese entity.

Other countries

TRL underwrites business on a global basis with a wide distribution of territories and classes of business.

For more 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, and the amortisation of any discount or premium on available-for-sale debt securities for the period) and realised and unrealised gains and losses, net of interest payable, investment expenses and impairment losses on financial assets.

Interest income is recognised as accrued based on the effective interest method. Acquisition costs related to the purchase of bonds are capitalised and expensed over the duration of the investment.

Financial investments

TRL's investment portfolio is made up of fixed income securities (96% of the portfolio by market value at 31 December 2018; 2017: 100%) and ETFs (4% of the portfolio by market value at 31 December 2018; 2017: 0%), which earned combined net investment income of $17,036k (2017: $16,046k) during the year. The book yield of the USD portfolio increased to 2.63% at 31 December 2018 from 2.35% at 31 December 2017, an increase of 28 basis points and generating additional net investment income compared to the prior year. Overall, net additions of financial investments to the portfolio increased during the year outweighing a $10,214k net loss on the market value, most of which was the result of temporary unrealised losses due to the rising interest rate environment. The total value of the portfolio increased to $836,946k as at 31 December 2018 from $793,605k in the prior year. Portfolio allocation change year-on-year was relatively modest. The biggest movers were a 2% increase to mortgage backed securities (MBS) (from 29% to 31% of the portfolio) and a 3% decrease to covered bonds (from 11% to 8%).

Figure 10a: Investment portfolio performance for 2018

Asset Category ($'000s)	Income	Gains/ (losses)	Net income/gain or (loss)	Total SII Value (as at 31 December 2018)
Cash and deposits to cedants	1,262	0	1,262	79,744
Collateralised securities	3,963	(2,993)	970	204,715
Corporate bonds	9,177	(6,675)	2,502	285,695
Government bonds	2,634	1,055	3,689	236,405
Exchange Traded Funds	0	(1,601)	(1,601)	30,387
Total	**17,036**	**(10,214)**	**6,822**	**836,946**

Figure 10b: Investment portfolio performance for 2017

Asset Category ($'000s)	Income	Gains/ (losses)	Net income/gain or (loss)	Total SII Value (as at 31 December 2017)
Cash and deposits to cedants	2,101	0	2,101	110,938
Collateralised securities	8,906	169	9,075	200,289
Corporate bonds	3,888	(113)	3,775	304,180
Government bonds	1,151	528	1,679	178,198
Total	**16,046**	**584**	**16,630**	**793,605**

Securitisations

TRL's investment portfolio includes both government-backed securitisation and securitisations that are not government-backed.

Securitisations that are not government-backed

TRL's investment portfolio contains no asset backed securities (ABS) and one commercial mortgage backed security (CMBS) representing 0.1% of the portfolio. This compares to approximately 1% ABS and 0.2% CMBS in 2017. The reduction during 2018 relates to TRL's continued approach to reducing exposure in these asset classes as they mature and where they are ineligible for the purpose of Solvency II. All credit risk associated with the underlying assets is passed directly through these securities with no subordination of different categories of investor.

Government-backed securitisations

In addition, 28.1% of TRL's portfolio is US Federal Agency mortgage backed securities (2017: 28.4%).

Exchange Traded Funds

At the start of February 2018, TRL introduced an equity (S&P 500) ETF and a high yield ETF to the portfolio. The combined value of this asset class at 31 December 2018 was $30,387k or 4% of TRL's investment portfolio. This strategy was directed at improving investment total return performance by diversifying TRL's portfolio to achieve superior growth over the longer term whilst improving regulatory capital efficiency. The investment decision also aligns with TRL's investment strategy of capital preservation, increasing surplus whilst maintaining and improving liquidity.

Although for the period from inception to 30 September 2018, the equity and high yield bond ETFs returned 5.6% and 2.9% growth respectively, the position as at 31 December 2018 was reversed, with a cumulative depreciation of 8.8% and 1.1% being recorded. This result was attributed to continuing concerns over global growth, trade tensions and other geopolitical risks, which dominated sentiment in Q4 2018, driving equity markets lower and high yield spreads higher. TRL expects continued volatility in this asset class but believes by investing to hold over the longer term, superior total returns will be achieved.

A.4 Performance of other activities

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

TRL's reporting and presentational currency is USD. The operating results and financial position of each non-USD ledger are translated into USD. 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 European Union (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 TRL are the ability to access EU reinsurance markets in the future and the devaluation of sterling. The non-UK European risks in the current portfolio do not represent a material portion of TRL's portfolio and the currency risk associated with Brexit is managed by the capitalisation of TRL being held in USD and matching the insurance liabilities with assets in the same currency.

However, concerns among European cedants over the acceptability of UK registered paper continue: as at 1 January 2019, a small part (less than 10%) of renewing TRL premium was transferred to LBO in response to client concerns about the possible impact of a 'hard' Brexit. Other business was renewed with a Brexit clause that could trigger a transfer to LBO, or other TransRe office in Europe, in the event of a 'hard' Brexit.

Given the possible imminence of the UK's departure and the many unknowns, Brexit continues to be an area of considerable management focus as the direction becomes clearer. Events, including the impact on TRL, are frequently assessed and formally discussed at TRL's Brexit Committee to ensure the company is well positioned to execute its business plan and that its strategy remains appropriate and robust.

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

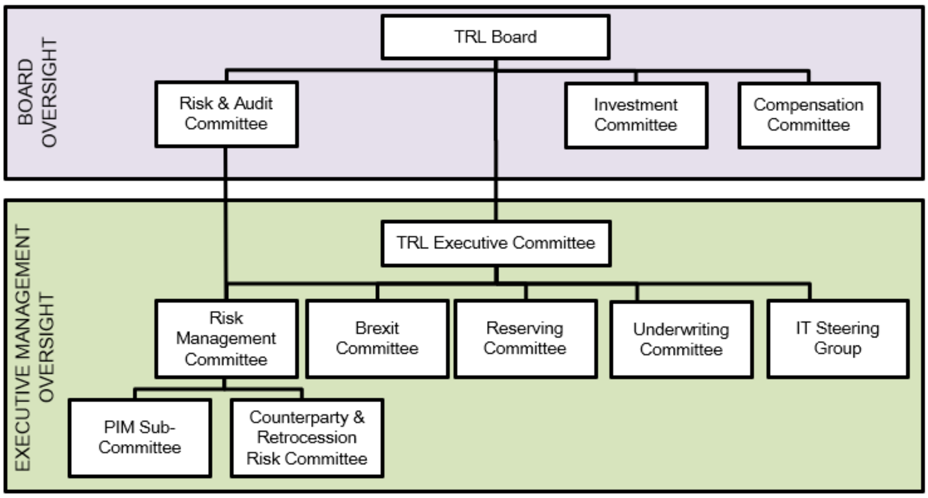
B. System of Governance

B.1 General information on the system of governance

TRL'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 TRL's key governance bodies is shown in Figure 11.

Figure 11: Governance oversight and reporting lines



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

- setting, promoting and demonstrating TRL's culture, vision and values;
- setting TRL's business strategy and monitoring performance against its business plan;
- approving TRL's risk appetite and tolerances ensuring they are in line with TransRe global appetites;
- reviewing the adequacy and appropriateness of TRL's reserves, as established by the Reserving Committee;
- maintaining oversight of TRL's compliance with relevant laws and regulation;
- maintaining oversight as regards the effectiveness of TRL's corporate governance framework and internal control framework.

The members of TRL's Board at 31 December 2018 are identified in Figure 12.

Figure 12: Board members and committee memberships

Board Member	Role	Committees
Mike Sapnar	Non-executive Chair	Investment, Compensation*
Paul Bonny	Non-executive director	
Gary Schwartz	Non-executive director	Risk & Audit
Stewart Laderman	Independent non-executive director	Risk & Audit, Investment
Mark Stephen	Independent non-executive director	Risk & Audit, Investment*, Compensation
Mark Winlow	Independent non-executive director	Risk & Audit*, Investment, Compensation
Geoff Peach	Executive director, Chief Executive Officer ("CEO")	
David Radford	Executive director, Chief Financial Officer ("CFO")	Investment

(* denotes chair of the respective committee)

As shown in Figure 11 above, TRL's Board operates three committees.

The members of the Risk & Audit Committee and the Compensation Committees are all non-executive Directors. The members of the Investment Committee are all non-executive Directors other than the CFO.

Risk & Audit Committee

The Risk & Audit Committee's responsibilities include:

Risk

- providing oversight and challenge to the effectiveness of TRL's Risk Management function, Enterprise Risk Management ("ERM") framework and risk management culture, including the adherence to the Board agreed appetites and tolerances, engagement with TRL's key business functions and progress embedding ERM in TRL in alignment with TransRe's overall ERM and risk governance framework;
- monitoring the identification, evaluation, quantification, mitigation and control of risks, both emerged and emerging;
- monitoring the effectiveness of TRL'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 TRL's Compliance function and approving the Compliance Monitoring and Training Plan and overseeing progress against it.

Audit

- monitoring and reviewing the effectiveness of TRL's Internal Audit function;
- approving the annual Internal Audit Plan and overseeing progress against it;
- reviewing Internal Audit reports and findings and monitoring the status of actions and recommendations;
- monitoring the integrity of the financial statements of TRL and any formal announcements relating to TRL's financial performance;
- reviewing TRL's internal financial controls;
- making recommendations to the TRL 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 three times per year.

Investment Committee

The Investment Committee's responsibilities include:

- reviewing and making recommendations to the Board in respect of TRL's investment strategy and policy in a manner consistent with the prudent person principle;
- reviewing summary reports on TRL'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 management; and
- considering reports in respect of investment risk management, liquidity management and credit management.

The Investment Committee meets at least three times per year.

Compensation Committee

The Compensation Committee's responsibilities include:

- oversight of the design and operation of the employee compensation programme; and
- oversight of remuneration and staff benefits.

The Compensation Committee meets annually.

Each of the committees reports to the Board through their respective Chairs. Risk & Audit Committee and Investment Committee reports are a standing item on the Board's agenda. The Compensation Committee reports to the Board after the Compensation Committee's annual meeting and any ad hoc meetings that may be held.

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

The Board carries out regular reviews of its own effectiveness. Consistent with the UK Corporate Governance Code, these reviews consider the balance of skills, experience, independence and knowledge of TRL on the Board, its diversity, how the Board works together and other factors relevant to its effectiveness.

Executive Committee

TRL's Executive Committee is led by the CEO and reports to the Board. It is responsible for:

- management and oversight of the day-to-day business;
- development and execution of TRL's strategy, financial management, risk management business and Compliance oversight, operational performance (including performance of third party outsourcers) and change management;
- agreeing and recommending to the Board the annual budget and business plan;
- monitoring underwriting and investment performance; and
- ensuring the effectiveness of the three lines of defence model and ultimately, TRL's internal control framework.

The Executive Committee reports to the Board through the CEO as a standing agenda item.

The Executive Committee maintains four senior sub-committees that report into it and also sponsors the IT Steering Group, as shown in Figure 11. The Executive Committee and its sub-committees maintain terms of reference that are reviewed at least annually.

Key functions

Each of the key functions within TRL is operationally independent of each other, although some individuals are key function holder for more than one function:

- the CUO is also holder of the Catastrophe Modelling function;
- the Head of Claims is also holder of the Business Management Department;
- the CFO is also holder of the Operations (IT and Systems) function;
- the Chief Administration Officer ("CAO") and Head of HR is holder of both the Operations (non IT and Systems) and HR functions; and
- the Head of Legal and Compliance is holder of both Legal and Compliance functions.

The key functions have their own teams and reporting lines. 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 has the necessary authority, resources and operational independence.

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

Figure 13: Key functions

Key Function	Holder	SMF
Risk Management System	Head of Risk	SMF4
Compliance	Head of Legal and Compliance	SMF16

Key Function	Holder	SMF
Internal Audit	Director of Internal Audit	SMF5
Actuarial	Senior International Actuary	SMF20
The function of effectively running the firm:		
Executive Management	CEO	SMF1
Underwriting	Chief Underwriting Officer ("CUO")	SMF23
Finance	CFO	SMF2, SMF24
Claims	Head of Claims	SMF18
Operations	CFO CAO and Head of HR	SMF2, SMF24 SMF24
Members of TRL's Board (not otherwise listed)	Directors	Various
SMF7 holders on the governing body of a parent or other group company	Various	Various
Any other function which is of specific importance to the sound and prudent management of the firm:		
Business Management Department	Head of Claims	SMF18
Catastrophe Modelling	CUO	SMF23
HR	CAO and Head of HR	SMF24
Legal	Head of Legal and Compliance	SMF16[1]
IT/Systems	CFO	SMF2, SMF24
SMFs not otherwise identified above		
SMF7 holders not on the governing body of a parent or other group company	Alleghany Head of Fixed Income	SMF7

Remuneration policies and practices

All TRL staff are employed by TransRe London Services Limited, a fellow subsidiary of TRC.

Approach to remuneration

TRL adopts an approach which supports and encourages appropriate behaviour that is aligned with TransRe's vision and values and Alleghany's Code of Business Conduct and Ethics.

Assessment of performance

Reviews are performed by line managers and reviewed by senior management and HR before individual awards are finalised. This is a key component of the appraisal process to ensure TRL performance is linked to rewards.

Financial and non-financial criteria are taken into account when assessing an individual's performance. A key element of an individual's performance assessment is his/her adherence to the Alleghany Code of Business Conduct and Ethics and compliance with policies and procedures.

[1] The FCA has concluded that the Head of Legal is not required to be a SMF. However, the Head of Legal and Compliance is responsible for the Legal function and is registered as a SMF for the Compliance Function.

Fixed and variable components of remuneration

Remuneration is made up of two key elements, fixed and variable. The fixed element is base salary. The variable element has two components, an annual bonus and deferred compensation. Base salary, bonus and deferred compensation are reviewed annually in line with an appraisal and review process.

For more senior employees and officers, fixed base salaries generally comprise a minority of total compensation: the majority of compensation is tied to performance-based annual and long-term incentives.

There are no entitlements to share options or shares.

Benefits

There is a regular Benefits Committee meeting to consider all elements of the benefit package (including pension, private medical, health, income protection and life insurance) offered to employees. The benefits provided are designed to be both competitive and to target insurance protection for health and loss of income.

There are no supplementary pensions or early retirement schemes for the members of the Board or other key function holders.

Material transactions with shareholders

TRL has a 60% whole account quota share reinsurance agreement with TRC (as reinsurer; the “TRC Quota Share”). To secure its liabilities under the TRC Quota Share, TRC established a trust account under a trust agreement (the “TRC Trust Agreement”).

In addition to the above, TRC entered into a Capital Support Guarantee Agreement (the “TRC Guarantee”) in favour of TRL. Under the TRC Guarantee, TRC agrees to maintain TRL’s regulatory capital in an amount greater than TRL’s SCR.

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

TRL has assessed the nature and 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 TRL’s Board collectively possess appropriate qualifications, 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

TRL ensures that all PRA and FCA Senior Manager Function holders, key function holders, notified NEDs and Certification Function holders are at all times fit and proper persons. TRL does not draw a distinction between these categories when carrying out its own assessment of a person’s fitness and propriety.

Timing of assessment

TRL assesses the fitness and propriety of a person when that person is being considered for any SMF, key function, notified NED or Certification Function position and on an on-going basis thereafter.

The on-going evaluation is performed at least annually and consists of, as a minimum, a performance assessment and a self-certification.

Nature of assessment

In deciding whether a person is fit and proper, TRL 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 TRL.

Any breaches of the fit and proper requirements are internally reported to the Heads of Risk and HR. TRL's Head of Risk is responsible for notifying the relevant regulator(s) of the change in circumstances and any remedial action that is being undertaken by TRL.

Training and competency

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

TransRe 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

TRL'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 TRL's objectives over the short, medium and longer term in a manner that is commensurate with TRL'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 TRL, improve decision-making and to support the achievement of TRL's business objectives. In summary, the purpose of TRL's ERM framework is to:

- actively sponsor and foster a risk aware culture across TRL, supporting staff in making risk management based judgements, encouraging effective management of exposures within TRL's stated risk appetite;
- ensure a clear, coherent risk strategy that includes policies, standards, risk appetites and clarity of ownership for risks;
- ensure risk is taken into account in key business decisions;
- ensure risk taking activities are consistent with TransRe's broader risk management vision and appetites;
- ensure that the 'three lines of defence' model operates effectively;
- implement risk strategies and policies that align with TransRe's and TRL'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.

TRL'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 are supported by a comprehensive suite of management information. The framework is aligned with the regulatory requirements under the Solvency II regime as adopted by the PRA and FCA and good business practice.

By adopting this approach, TRL believes it 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.

TRL senior management and risk owners identify key risks to the business, as part of a rolling risk identification and assessment programme. Risk causes and consequences, together with mitigating controls, are identified for each risk. Key risks, owners and mitigating controls are recorded in a risk register; which is presented to management (and ultimately TRL's Board) on a quarterly basis for review and discussion.

The risks recorded in the register form part of TRL's ORSA process and are key inputs in the development of TRL's internal audit programme. TRL's Risk & Audit Committee receives regular reports from TRL's Head of Risk which consider key risks to TRL, aggregations and exposures across the key ERM pillars.

TRL's Risk Management function is integrated into TRL, TransRe and Alleghany through the governance reporting lines to TRL's CEO, TransRe's Chief Risk Officer ("CRO") and TRL's Risk & Audit Committee and involvement in key decision making forums. 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 realistic stress and reverse stress tests for TRL.

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

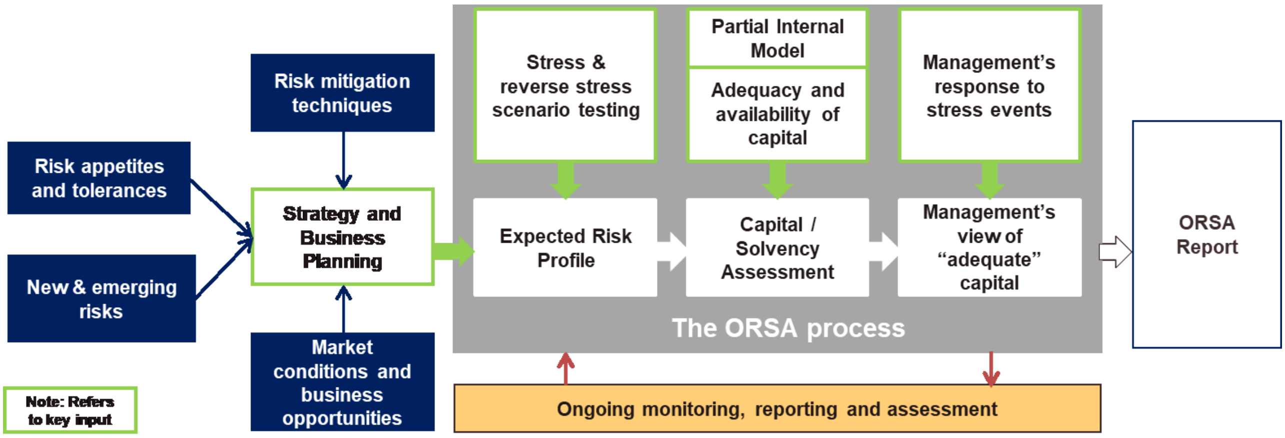
The ORSA process considers TRL's own solvency assessment against its risk profile, business objectives and capital management strategy in comparison to its regulatory solvency requirement in order to determine whether additional capital is required. The ORSA also considers the impact on TRL should it be subject to significant losses arising from both insurance and non-insurance events; against such extreme events, the ORSA considers what actions TRL management would undertake to mitigate the impact of such events. Furthermore, as part of the ORSA process, TRL considers the amount of capital it should maintain to meet its contractual liabilities to "ultimate".

TRL produces an ORSA report on at least an annual basis. The ORSA is considered a key management tool and is linked to TRL's business planning and strategy, risks TRL is exposed to and the associated capital.

TRL senior management has identified a number of business and event 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.

The ORSA process can be diagrammatically represented as follows:

Figure 14: TRL's ORSA process



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

TRL's Board and Senior Management provide input and review into the scenarios considered within the ORSA stress tests. In addition, TRL's 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 Management Committee and 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 TRL's capital adequacy.

TRL'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 the Risk Management Committee, the Executive Committee, the Risk & Audit Committee and ultimately TRL's Board. Once the report is reviewed, the ORSA and the amount of capital TRL intends to maintain, based on its expected risk profile, is approved by the Board and the ORSA report is shared with the PRA.

B.4 Internal control system

Within TRL, 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.

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;
- TRL is in compliance with group Sarbanes Oxley requirements; 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 IFRS financial statements are subject to rigorous controls in the 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, TRL's Internal Audit function, through planned and commissioned reviews of TRL's processes, provides an independent opinion on the internal control framework of TRL's business.

Implementation of TRL's Compliance function

TRL's Compliance function seeks to promote an organisational culture committed to integrity, ethical conduct and compliance with the law, and to set standards, policies and procedures that provide reasonable assurance that TRL acts in a manner consistent with its local compliance and regulatory obligations and within TransRe's overarching compliance requirements.

The Compliance function is headed up by TRL's Head of Legal and Compliance who has a direct reporting line to the CEO of TRL and TRC's Chief Compliance Officer ("CCO"). TRL's Head of Legal and Compliance also holds the role of Regional Compliance Officer ("RCO") for London. The London RCO is responsible for ensuring that TransRe's compliance mission is implemented, coordinated and enforced within TRL and reports any compliance violations or issues to the CCO.

TRL's Compliance function reports on a quarterly basis to the Board, Risk & Audit Committee and Executive Committee, as well as to TransRe's group compliance department. The Compliance function is responsible for reporting to senior management any breaches of, or non-compliance with, its policy or any other relevant policy, rules and regulations. The Compliance function has sufficient authority 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 TRL's policies and clearly communicating ethical guidance;
- assessing the possible impact of any changes in the legal and regulatory environment on the operations of TRL;
- identifying and assessing compliance risks relevant to TRL and managing the control environment that mitigates those risks;
- undertaking compliance monitoring and making recommendations to improve the effectiveness of compliance practices; and
- identifying TRL compliance training needs and working with TransRe's Corporate Compliance Department ("CCD") and HR to implement effective compliance training programmes.

B.5 Internal Audit function

The TRL Internal Audit function is led by the TransRe Director of Internal Audit, based in New York, USA, who is registered as TRL's Senior Management Function holder for the Internal Audit function. Internal Audit is an independent function that provides objective challenge and assurance over TRL. Internal Audit supports TRL 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 TRH Audit Committee, with ultimate oversight provided by Alleghany's Audit Committee. Rolling three-year audit plans are submitted annually to the TRL Risk & Audit Committee and TRH Audit Committee for approval. Results of internal audits are distributed to TRL's senior management, the TRL Risk & Audit Committee and to TRH's Audit Committee. Outstanding internal audit actions are tracked and progress reported at the TRL Risk & Audit Committee and the TRH Audit Committee.

In addition to reporting into the TRL Risk & Audit Committee, the Internal Audit function holds regular meetings with TRL's Head of Risk and Head of Legal and Compliance 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.

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

B.6 Actuarial function

The TRL Head of Actuarial is responsible for the overall management and day-to-day leadership of the TRL Actuarial function and has a direct reporting line to the CEO of TRL and to the TransRe group Chief Actuary.

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;
- 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.

The Actuarial function reports on a quarterly basis to the Reserving Committee, which is a sub-committee of the Executive Committee, and to the Board as a standing agenda item. In addition, an annual internal Actuarial Function Report is provided to the Board.

B.7 Outsourcing

Outsourcing management

There is no delegation by TRL's key function holders of their responsibility for those functions.

For each outsourcing arrangement, a TRL manager (the "Outsourcing Owner") is identified in TRL's outsourcing register. 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.

TRL's Chief Administration Officer maintains the outsourcing register.

Outsourcing of critical or important operational functions

Details of outsourcing in respect of TRL's critical or important operational functions are set out in Figure 15.

Figure 15: Outsourcing of critical or important operational functions

Outsourcing	Jurisdiction
TRL staff are employed by another company in the TransRe group, TransRe London Services Limited ("TRLS"), and are provided to TRL on a secondment basis.	UK
Certain intra-group services and support services are provided by TRC.	New York, USA
TRL outsources the day-to-day activities of its Internal Audit function to Mazars, as described in Section B5.	UK
TRL'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 and investment management functions, both based in New York, USA with further oversight provided by TRL's CFO in the UK. BlackRock reports quarterly to TRL's Investment Committee.	UK
TRL participates in the central settlement services provided by XChanging to the London insurance market	UK

B.8 Any other information

There have been no material changes to TRL's system of governance in 2018, although some non-material changes have been made to reflect the implementation of the Senior Managers & Certification Regime ("SM&CR").

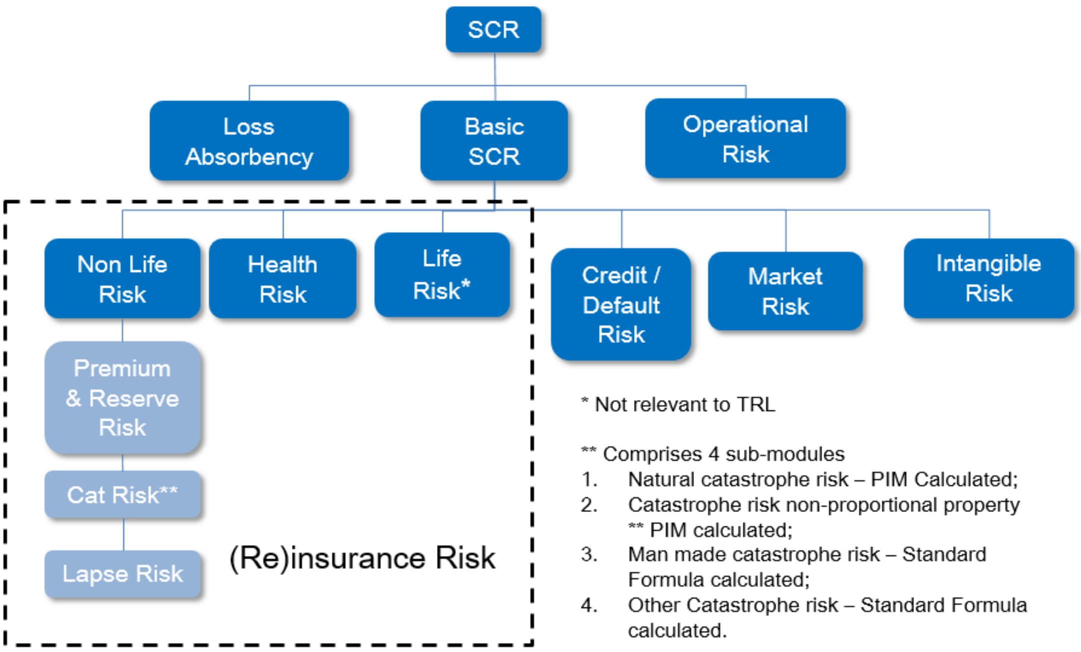
Effective 31 December 2018, the PRA approved TRL's PIM with respect to natural catastrophe risk, as described in Section E2. The TRL Board owns the PIM and is responsible for putting in place systems which ensure that the PIM operates properly on a continuous basis.

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

C. Risk profile

TRL is a wholly owned subsidiary of TRC and provides specialist non-life reinsurance. Under Solvency II, TRL's SCR is calculated using the Standard Formula for all components with the exception of natural catastrophe risk where TRL uses its PIM to calculate the capital requirements (see Section E2 for further information). 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 16: Standard Formula risk modules



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

C.1 Reinsurance / underwriting risk

There has been no change in TRL's approach or appetite to reinsurance/underwriting risk during 2018 and TRL continues to underwrite a diversified portfolio of property and casualty reinsurance across multiple regions and classes.

Key underwriting risks to which TRL is exposed include:

- Premium / underwriting risk
  - underwriting outside of appetite;
  - excess exposures in certain classes and/or territories;
  - underwriting below the technical price or without adequate risk transfer;
- Retrocession risk
  - failure to follow retrocession procedures and guidelines, or design and operation of retrocession programmes;
- 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");
- Catastrophe Risk
  - excessive aggregation/catastrophe risks in a single region/location;
- Lapse risk

- the uncertainty arising from the risk of loss or adverse change in the value of insurance liabilities as a result of the discontinuance of reinsurance policies.

TRL 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 and mitigation techniques

TRL maintains a clear underwriting philosophy that is supported by risk appetites and tolerances set at the aggregate level as well as at individual class and per risk. These are in turn supported by procedures and controls in relation to pricing, rigorous risk selection criteria and the ability to underwrite a diverse range of risks across multiple classes and geographies.

TRL assesses and mitigates these risks by having in place a number of key controls and processes, including:

- ongoing monitoring and exposure management that includes assessing individual and aggregate exposures across all lines of business and in geographical territories;
- exposures assessed and tracked against risk tolerances; and
- performing, on an ongoing basis, a range of extreme events and stress tests.

TRL utilises a third party catastrophe model to model the occurrence and severity of events for windstorm/hurricane, earthquake and flood. The model uses actual exposure sets of in-force policies as a proxy for future exposures which is further enhanced by monitoring trends and claims development.

Ongoing reviews of underwriting activities, including quarterly underwriting performance reviews, pricing adequacy reviews and rate monitoring supplement the oversight framework. The adequacy of the risk mitigation techniques is considered as part of the ORSA process that is discussed further above.

TRL's main risk concentration continues to relate to natural catastrophe exposure in Northern Europe (including the UK).

Retrocession risk management

TRL benefits from a comprehensive retrocession programme that provides protection for TransRe globally as well as TRL specifically. Risks associated with retrocession are managed and mitigated by ensuring that all retrocession placements are subject to approval and must comply with TransRe's group-wide retrocession procedures (which include minimum credit quality and counterparty limits approved by the Alleghany Reinsurance Security Committee) and delegated retrocession purchasing authorities.

TRL benefits from protection provided by special purpose vehicle ("SPV") as follows:

- a series of fully collateralised reinsurance sidecars; and
- a catastrophe bond, referred to as "Bowline Re" that provides $250 million (as at 31 December 2018) of protection for predominantly US and Canada natural catastrophe risks.

Both arrangements are overseen by TransRe Capital Partners and focus on protecting TransRe and TRL from excessive natural catastrophe losses. Liabilities are fully collateralised with assets that meet, as a minimum, the aggregate limit of the SPVs' obligations, with liabilities measured in a manner consistent with the Solvency II Directive.

Reserve risk management

Reserve risk is managed by TRL's Actuarial function with oversight provided by TRL's Reserving Committee and ultimately TRL's Board. Key controls to manage this risk 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 retrocession transaction alerts; and
- independent validation of reserves.

Risk sensitivity for underwriting risks

TRL undertakes detailed stress and scenario testing on a quarterly basis with the results presented at the Risk & Audit Committee and as part of its ORSA process.

As part of the ORSA process, the current and projected solvency position over the business planning period are 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 (for example market risks and underwriting risks or a series of underwriting events). Consideration is also given to a material deterioration in TRL's reserves, including adverse development in claims ratios and IBNR. The results of the analysis showed that in 2018, the most material impact on the SCR continues to arise from a natural catastrophe event affecting the UK and Europe. The analysis undertaken indicates TRL remains strongly capitalised and it would take an extreme event (return periods in excess of 1-in-200 years) to breach the SCR. TRL's underwriting risk profile is therefore resilient to severe shocks and events and is within the Board approved risk appetite.

Processes for monitoring the effectiveness of risk mitigation techniques

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

In relation to Reserve Risk, TRL's actuarial function conducts quarterly reserve reviews of TRL's portfolio to determine appropriate reserve levels and expected IBNR adequacy. TRL's reserves are also subject to review by TransRe's group actuarial function, based in New York, USA. Finally, as part of the annual statutory audit, TRL's reserves are subject to independent review.

C.2 Market risk

Market risk is the risk of loss or adverse change in TRL's financial situation resulting from changes in the value of its assets and its financial obligations caused by the volatility of market prices of assets, liabilities and financial instruments. It includes risks associated with the use of financial instruments, including movements in interest rates, foreign exchange exposure (currency risk) and equity investments; and changes in valuation processes.

There has been no change in TRL's market risk appetite during 2018.

For TRL, market risk comprises the following key components:

Figure 17: Standard Formula market risk sub-modules

The Investment Committee reviews, at least annually, TRL's investment strategy which is based on four key principles, to:

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

TRL's investment strategy forms the basis for the mandate given to TRL's investment managers (BlackRock). BlackRock manages TRL's fixed income investment portfolio in line with the agreed investment mandate provided to it. The mandate includes limits on certain classes and types of investments, restriction on investments in certain industries, sector and geographical limits and a prohibited list of companies which would result in excessive concentration of underwriting and investment risk. The execution of TRL's investment strategy is subject to ongoing monitoring and scrutiny by the Investment Committee.

During 2018, TRL invested in two exchange traded funds ("ETF") which represent approximately 4% of the total investment portfolio. These have been invested taking into account the liquidity requirements of TRL along with the nature and timing of insurance liabilities. The purchase of ETFs during 2018 does introduce some additional volatility to the investment portfolio; however, this remains within the TRL Board approved investment appetite and strategy.

During the period, there have been no material changes to TRL's market risk profile, with the exception of the introduction of ETFs. TRL continues to have a material risk concentration to the US Government; this is managed through ongoing review and monitoring by the TRL Investment Committee and TRL's investment managers.

TRL is exposed to the following key market risks:

Interest rate risk

Movements in interest rates affect the amount and timing of cash flows for TRL and the fair value of fixed income securities. As interest rates rise, the fair value of fixed income portfolios declines and conversely, as interest rates decline, their fair value rises. To minimise this risk, TRL adheres to investment policy guidelines developed by TRL's Investment Committee in line with TRL's strategy and TransRe's overall objectives. These guidelines direct TRL 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 and the duration of TRL's technical liabilities.

Spread risk

This risk relates to the potential financial loss TRL may suffer due to a change in the spread that a fixed interest security trades at relative to a comparable government bond.

Equity Risk

The potential financial loss arising from the reduction in the value of the investment portfolio due to changes in prices of equities, mutual funds and equity-linked capital market instruments. The Company's exposure to equity risk is immaterial because holdings in underlying equity securities are not significant.

Foreign currency risk

Assets backing the equity and liabilities of TRL are typically maintained in currencies matching the currencies of its technical provisions, other liabilities and share capital (denominated in US dollars) thereby mitigating the potential impact of foreign exchange and interest rate risk on TRL's solvency position.

Market risk management and mitigation techniques

TRL maintains a number of risk mitigation techniques and approaches to manage the risks associated with market risk. Key techniques and controls 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;
    - issuer limitations; and
    - currency;
- Investment Committee mandate and oversight;
- stress testing; and

- market risk/value at risk analyses, including extreme market and currency stress tests (+/-300bps movement).

As at the end of December 2018, TRL's investment portfolio is split across the following asset classes:

Figure 18a: Asset breakdown as at 31 December 2018

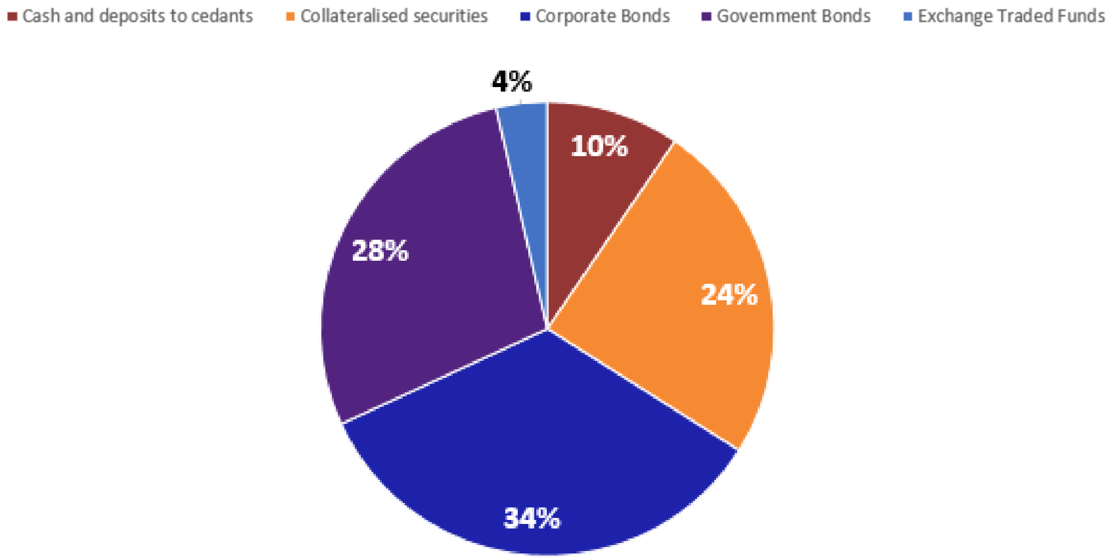
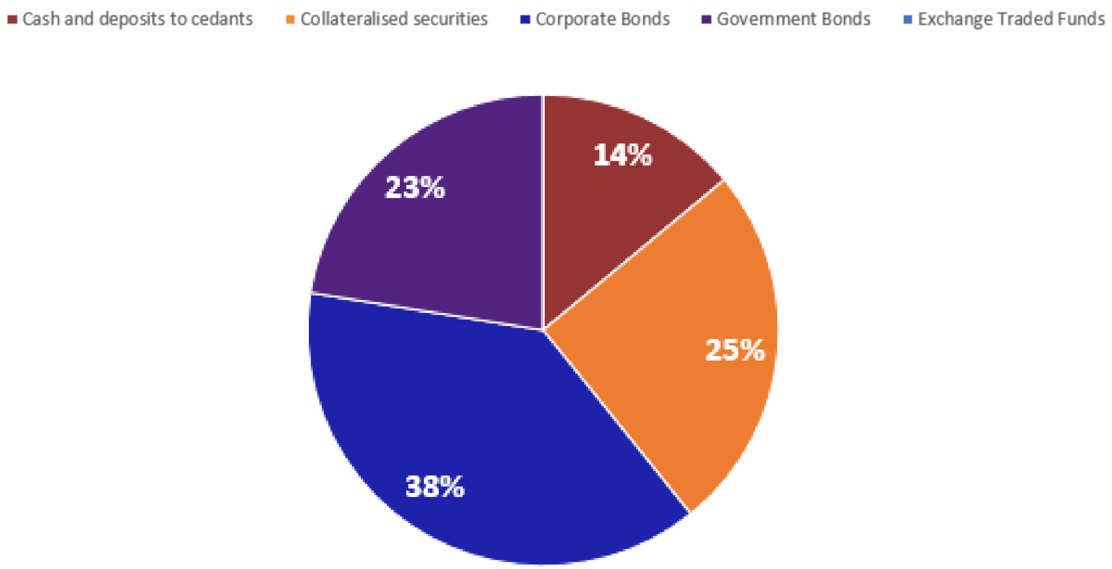


Figure 18b: Asset breakdown 31 December 2017



The credit quality of TRL's investment portfolio is split as follows:

Figure 19a: Credit quality of portfolio (excluding current account cash) – as at 31 December 2018

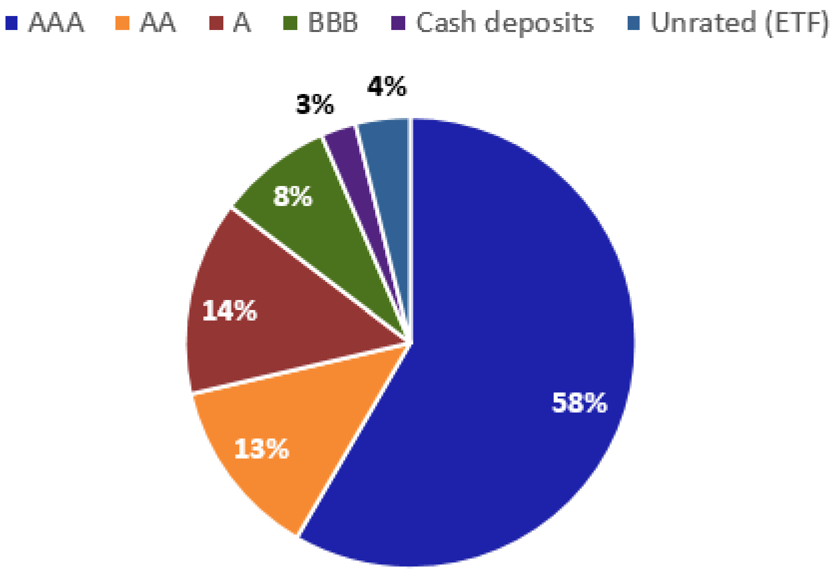
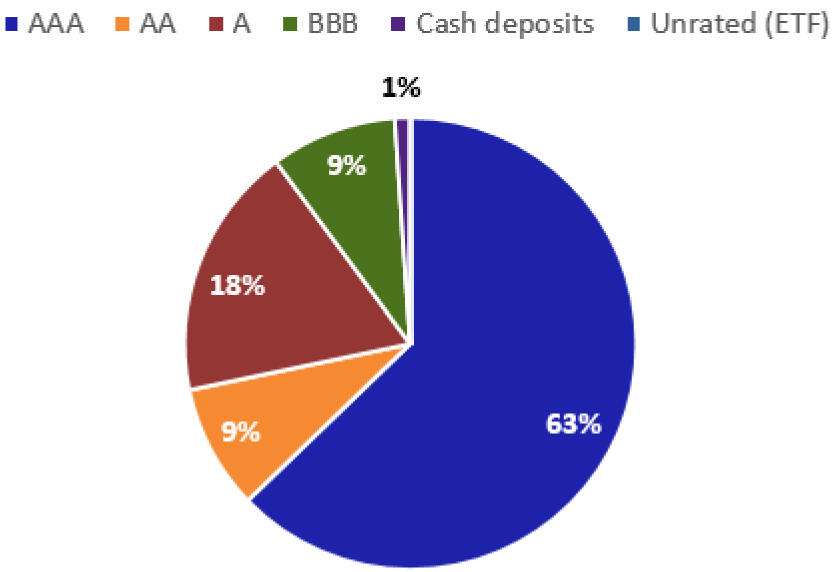


Figure 19b: Credit quality of portfolio (excluding current account cash) – as at 31 December 2017



Risk sensitivity for market risks

TRL performs stress and scenario testing as part of its approach to managing market risk. Results are presented at the TRL Investment Committee and 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, in which more severe low interest rate environment scenarios were considered.

Under all of these scenarios, the analysis indicated that TRL was strongly capitalised and was able to withstand these extreme shocks without breaching its SCR.

Prudent person principle

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

TRL's investment principles underpin its investment strategy. The strategy is ultimately approved by the Board and is reviewed on an ongoing basis by the Investment Committee and TRL's CFO. Assets covering the technical provisions must be invested in assets that meet the criteria set out in the investment mandate and must be appropriate to the nature and duration of TRL's reinsurance liabilities. TRL does not permit investment in any asset category that is not included in its investment mandate.

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

Processes for monitoring the effectiveness of risk mitigation techniques

TRL benefits from ongoing oversight of its investment portfolio by the TRL Investment Committee and by TransRe's Treasury function, supplemented by oversight provided by TRL's CFO. Furthermore, the extreme stress tests incorporated into the ORSA process, TRL's risk register and the quarterly stress and scenario testing TRL performs supplement these controls.

TRL'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.

Assets are managed in such a 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 TRL is exposed to a loss if another party fails to perform its financial obligations to TRL, including the failure to perform them in a timely manner. This includes default by brokers, retrocessionaires, customers and investment counterparties. Included within this category is the management of the credit risk associated with the TRC Quota Share described in Section B1.

There has been no change in TRL's credit risk appetite or approach during 2018.

Brokers / intermediaries / retrocessionaires

Similar to other insurance and reinsurance companies, TRL has a concentration risk with the international brokers and intermediaries, as they represent a major conduit of business to TRL. All brokers, intermediaries and retrocessionaires are subject to ongoing review by a range of fora, including the Counterparty & Retrocession Risk Committee and Risk Management Committee.

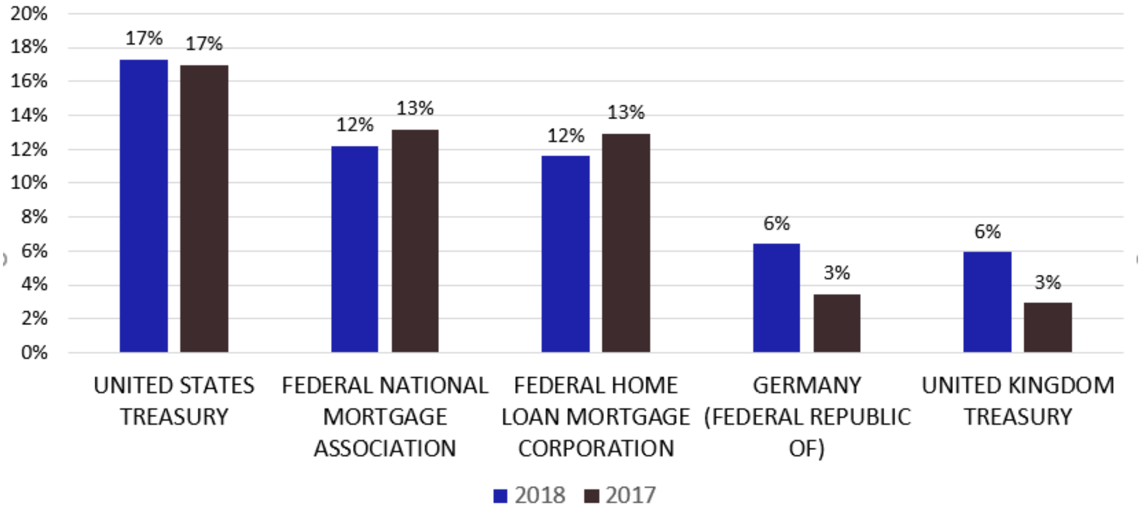
Prior to transacting with brokers, cedants or ceded reinsurers for the first time, a KYC check is carried out.

Retrocessionaires must go through a credit and security assessment which is overseen by Alleghany's Reinsurance Security Committee and TransRe's Global Risk Management function ("GRM") based in New York and monitored by TRL's Counterparty & Retrocession Risk Committee. 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 retrocessionaire.

Investment counterparties

TRL maintains a diversified highly rated investment portfolio in its three functional currencies: USD, GBP and EUR, with its main investment exposure being to the US Government and US Treasury.

Figure 20: Top five portfolio issuer exposures as at 31 December 2018



TRL's credit risk management strategies outline the credit rating requirements for its investments. Adherence helps to ensure investments are selected in a way that enables the effective management of the risk of counterparty default to an acceptable level in line with TRL and TransRe approved risk appetite and tolerances. The credit management strategy also takes into account the exposure to credit spreads.

To aid the monitoring of compliance with the credit rating requirements of TRL's credit risk management strategy and to minimise the risk of counterparty failure arising from external parties, TRL 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.

TRL uses external credit assessments primarily to review the credit quality:

- of assets in its investment portfolios; and
- of its retrocessionaires.

TRL 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 their own market knowledge and intelligence provided by professional investment managers.

The TRC Quota Share

The TRC Quota Share is TRL's largest credit risk. To mitigate the risk, TRC's obligations are fully collateralised under the TRC Trust Agreement with assets maintained in the three functional currencies as outlined above. All assets must meet certain criteria which include credit quality, type, issuer and concentration limits.

Cash held at Banks

As part of TRL's commitment to paying claims in a timely manner, TRL maintain cash deposits at National Westminster Bank ("NatWest"), a subsidiary of the Royal Bank of Scotland Group, and at JPMorgan Chase Bank. Amounts held at these institutions vary throughout the year and are based on cashflow forecasting and expected claims payment patterns.

Key controls

Key controls to mitigate credit risk include:

- Counterparty & Retrocession Risk Committee oversight;
- investment risk and underwriting risk accumulation reporting;
- approved retrocessionaire lists;
- quota share collateral ongoing monitoring and reporting; and

- 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

The sensitivity of the solvency ratio to credit defaults or rating downgrades of TRL's counterparties has been considered as part of the risk management system (which includes the credit risk associated with TRL's Quota Share agreement with its parent, TRC). The analysis demonstrated that TRL is resilient to a range of events including severe counterparty rating downgrades or failure of TRC to meets its obligations under the collateralised quota share arrangement.

Prudent person principle applied to credit risks

Counterparties are selected taking into account their credit rating and reputation and, where appropriate, advice from professional investment managers. Credit ratings are used as a way of identifying and managing counterparty credit risk and TRL ensures only counterparties with sufficiently high credit ratings are used. TRL does not rely on a single rating agency; instead, it uses a number of agencies combined with its own analysis. TRL seeks to avoid excessive counterparty exposures.

Retrocessionaires are selected from a group wide approved retrocessionaires list, with all other retrocessionaires not on the list subject to individual review and approval by either Global Risk Management or the Alleghany Reinsurance Security Committee.

Processes for monitoring the effectiveness of risk mitigation techniques

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

Furthermore, TRL benefits from the additional oversight provided by both the TransRe Counterparty & Credit Risk Committee and Alleghany's Reinsurance Security Committee, which approves counterparties and monitors the credit quality of the retrocessionaires on TransRe's Security List.

In addition, reports showing counterparty exposures (both investment and retrocession) are provided to TRL's Investment and Risk & Audit Committee for oversight and review.

C.4 Liquidity risk

Liquidity risk would arise if TRL did not have sufficient financial resources available to enable it to meet its obligations as they fall due or could secure them only at excessive cost. There has been no change in TRL's liquidity risk appetite or approach during 2018 and TRL continues to have limited liquidity risk.

As at 31 December 2018, TRL continued to maintain assets in high quality liquid investments held in functional currencies matching TRL's liabilities and claim duration profile. Key controls to mitigate this risk include:

- asset/liability assessment performed every quarter;
- quarterly case reserving exercise;
- Investment Committee and Board monitoring;
- quarterly balance sheet review; and
- half-yearly profitability reviews.

Prudent person principle as applied to liquidity risks

Assets are prudently invested taking into account the liquidity requirements of the business and the nature and timing of TRL's (re)insurance liabilities. TRL manages its liquidity risk by maintaining a diversified liquid investment portfolio.

Risk sensitivity for liquidity risk

TRL has carried out stress and scenario testing as part of its approach to managing liquidity risk. Results have been reviewed by TRL's Investment Committee. TRL does not consider liquidity to be a material risk.

Process for monitoring the effectiveness of risk mitigation techniques

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

Expected profit included in future premiums ("EPIFP")

The EPIFP as at 31 December 2018 is $111,193k. 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 $92,905k.

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 TRL is 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 TRL's systems caused by internal and external security breaches.
- Financial & accounting – the risks associated with financial reporting and integrity of financial information.
- People – the risk that people do not follow TRL's procedures, practices and/or rules, thus deviating from expected behaviour in a way that could damage TRL.
- Business continuity management – the risk associated with the failure to appropriately manage unforeseen events.
- Processing failures, including IT system failures – the risks associated with IT systems.
- Model risk – the risk that the output from the models used by TRL 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.
- Outsourcing – failures relating to the outsourcing of key activities.
- External events and other changes – failure to react to changes in the external business environment.

TRL does not have any material concentrations to operational risk.

Quarterly, TRL's Directors and senior managers identify the key risks, causes and consequences together with relevant mitigating controls, within their ownership and span of control. The results of the assessment are recorded in TRL's risk register and reviewed by the Risk Management Committee and Risk & Audit Committee.

TRL maintains an Operational Risk policy that sets out TRL's approach to mitigating operational risks.

Key controls

Key mitigating controls include:

- Risk & Audit Committee and Risk Management Committee oversight of key operational risk metrics;
- policies and procedures, the group's code of conduct, penetration and attack testing, business continuity plans and succession planning;
- service level agreements;
- purchase of insurances; and
- underwriting audits performed by the Business Management Department.

Risk sensitivities for operational risk

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

Within TRL's ORSA, the current and projected solvency position over the business planning period were re-calculated following a range of adverse operational risk stresses. Under all modelled scenarios, the analysis indicated that TRL was strongly capitalised and was able to withstand these stresses without breaching its SCR.

Process for monitoring the effectiveness of risk mitigation techniques

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

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

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

C.6 Other material risks

Brexit: Risks related to Brexit are summarised in Section A5.

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

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

Emerging risks: On an ongoing basis, TransRe and TRL 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 helps to ensure TRL is able to react quickly should the environment in which it operates in change.

C.7 Any other information

Risk Sensitivity

TRL's SCR coverage ratio as at 31 December 2018 is 162%. The below table shows the absolute change in the coverage ratio under several hypothetical scenarios.

Figure 21: SCR coverage ratio sensitivity analysis

Scenario	% change to coverage ratio
Exchange rates: +10%	-2%
Exchange rates: -10%	2%
Interest rates: +1%	-6%
Interest rates: -1%	5%
Credit spreads: +1%	-5%
Credit spreads: -1%	5%
Catastrophe loss: $100m net of all reinsurance	-45%

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

D. Valuation for solvency purposes

TRL's Solvency II assets and liabilities are presented on an economic basis consistent with the "fair value" accounting concept. TRL prepares its statutory financial statements in accordance with 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 of preparation of TRL's financial statements, critical accounting estimates and judgements and key accounting policies are set out in Note 1 & Note 2 of the 2018 TRL Financial Statements.

TRL's IFRS valuation is used where consistent with Solvency II's economic basis. Assets and liabilities measured at cost or amortised cost in TRL'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.

TRL exercises judgement in selecting each of its accounting policies. UK 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 TRL 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, TRL's financial position, results of operations and cash flows could be materially affected.

The following sections describe the approaches used by TRL for valuing its assets and liabilities. There were no changes made to the recognition and valuation bases or to estimations during the reporting period.

D.1 Assets

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

Figure 22: Summary assets as at 31 December 2018

$'000s	Solvency II	Financial statements	Difference
Deferred acquisition costs	0	12,835	(12,835)
Deferred tax assets	2,712	4,345	(1,633)
Investments (including accrued interest)			
Government bonds	236,405	236,405	0
Corporate bonds	285,695	285,695	0
Collateralised securities	204,715	204,715	0
Exchange traded funds	30,387	30,387	0
Reinsurance recoverables			
Non-life excluding health	463,287	666,682	(203,395)
Health similar to non-life	3,692	6,435	(2,743)
Deposits to cedants	22,013	22,013	0
Total Receivables			
Insurance and intermediaries receivables	42,015	206,965	(164,950)
Reinsurance receivables	57,854	58,480	(626)
Receivables (trade, not insurance)	14,203	14,203	0
Cash and cash equivalents	57,731	57,731	0
Total assets	**1,420,709**	**1,806,891**	**(386,182)**

Total financial statement assets disclosed in this table agree with the statutory accounts value of $1,806,891k required for input to the QRT, whereas total assets in the TRL IFRS financial statements are $1,850,202k. The difference represents the value of the reinsurers' share of deferred acquisition costs which is included in the financial statements as a liability; whereas, in the European Insurance and Occupational Pensions Authority (EIOPA) templates, the net balance of deferred acquisition costs is presented as a net asset.

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

Deferred acquisition costs ("DAC")

Under IFRS the proportion of acquisition costs incurred that corresponds to the proportion of gross premiums written which are unearned at the balance sheet date is classified as DAC. Under Solvency II, acquisition costs are recognised on a cash flow basis within the reporting period, with any future cash flows for acquisition costs recognised in technical provisions.

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 its 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.

The deferred tax asset per the financial statements consists of tax on temporary differences only. There are no unused tax losses to report. Temporary differences are made up of unrealised gains/losses on investments and are expected to unwind at a tax rate of 17%, reflecting the average maturity date on the investment portfolio of 4.83 years.

The adjustments in the table below reflect the differences between the financial statements and Solvency II in the excess of assets over liabilities between the two valuation methods and are also expected to unwind at a tax rate of 17%.

Figure 23: Deferred tax calculation as at 31 December 2018

	$'000
Deferred tax asset/liability per financial statements	**4,345**
Adjustment needed (all timing differences are expected to unwind at a tax rate of 17%)	
Deferred acquisition costs	2,182
Change in technical provisions (incl. removal of unearned premium reserve)	(3,691)
Risk margin	5,219
Receivables (trade, not insurance)	(5,343)
Total Solvency II deferred tax asset	**2,712**

Financial instruments

Recognition and derecognition of investments

For a background to TRL's approach to the recognition and derecognition of investments, see pages 28-29 of the 2018 TRL Financial Statements.

Fair value of investments

TRL 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. All TRL's investment assets recorded at fair value under IFRS and Solvency II are measured and classified in a hierarchy for disclosure purposes. TRL applies the IFRS 13 fair value hierarchy as described below for all financial assets and liabilities, which is consistent with the one defined in the Solvency II Regulations. This hierarchy consists of three levels based on the observability of inputs available in the marketplace and is used to classify the fair values as discussed below:

- Level 1: Fair value measurements that are quoted prices in active markets that the Company has the ability to access for identical assets. Market price data is generally obtained from exchange or dealer markets. 4.0% of TRL's investment assets were classified as Level 1 as at 31 December 2018 (nil% 2017).
- Level 2: Fair value measurements based on inputs other than quoted prices included in Level 1 that are observable for the asset, either directly or indirectly. Level 2 inputs include quoted prices for similar assets in active markets and inputs other than quoted prices that are observable for the asset, such as interest rates and yield curves that are observable at commonly quoted intervals. 96.0% of TRL's investment assets were classified as Level 2 as at 31 December 2018 (99.6% 2017).
- Level 3: Fair value measurements based on valuation techniques that use significant inputs that are unobservable. These measurements may be made under circumstances in which there is little, if any, market activity for the asset. None of TRL's investment assets were classified as Level 3 as at 31 December 2018 (0.4% 2017). Further information on alternative valuation methods is included in Section D4.

TRL's assessment of the significance of a particular input to the fair value measurement in its entirety requires judgement. In making the assessment, TRL considers factors specific to the asset. In certain cases, the inputs used to measure fair value may fall into different levels of the fair value hierarchy. In such cases, the level in the fair value hierarchy within which the fair value measurement in its entirety falls is determined based on the lowest level input that is significant to the fair value measurement in its entirety. For assets and liabilities that are measured at fair value in the financial statements on a recurring basis, TRL determines whether transfers have occurred between levels in the hierarchy by re-assessing categorisation (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period.

Impairment

For a background to TRL's approach to impairment see pages 29-31 of the 2018 TRL Financial Statements.

Valuation differences between the Solvency II and IFRS balance sheets

TRL considers its policy on the fair value of investments, as described above, to be consistent with the hierarchy of valuation methods required for Solvency II for both assets and liabilities within the balance sheet. All investments in TRL's investment portfolio as at 31 December 2018 and 2017 are carried at fair value. Accordingly, the investment valuation bases between TRL's Solvency II and IFRS balance sheets are the same, with the exception that the value of investments in the Solvency II balance sheet includes interest accrued since the last coupon payment, while the IFRS financial statements disclose accrued interest separately.

Fair value sources and use of pricing vendors

TRL uses New England Asset Management (NEAM) to provide pricing and fair value of its investments.

Although TRL outsources the portfolio valuation function to its pricing vendor and investment manager, TRL is responsible for ensuring that the valuation methods and assumptions they employ provide reliable fair values.

Reinsurance recoverables

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

(Re)insurance and intermediaries receivable and payables

Insurance and reinsurance receivables and payables are recognised on a Solvency II basis once notified as due for payment. These include amounts due to and from insurers, retrocessionaires, agents and brokers. Receivables and payables are recognised at the amount expected to be received or paid when due. Due to the short-term nature of TRL's (re)insurance receivables and payables, amounts are not discounted on a either an IFRS or Solvency II basis.

The presentation of (re)insurance receivables and payables on the Solvency II balance sheet differs from TRL's statutory financial statements, since (re)insurance receivables and payables for financial reporting purposes include estimated premiums and claims, which are included in technical provisions in the Solvency II balance sheet as they are not yet due.

Other receivables (trade not insurance)

The valuation and presentation of TRL's other receivables and payables, in the Solvency II balance sheet, is consistent with the treatment for TRL's external financial reporting. TRL's other receivables are considered to be short term and therefore do not need to be discounted.

Cash and cash equivalents

Cash and cash equivalents comprises cash in hand and on demand deposits with banks, together with short-term highly liquid investments that are readily convertible into known amounts of cash and that are not subject to a significant risk of a change in value. Such investments are classified as cash equivalents where their maturity at acquisition is less than three months. Cash balances held in accounts with investment fund managers and custodians are treated as cash equivalents.

Foreign currency transactions and balances

TRL presents its financial statements and Solvency II reporting in US dollars, which is TRL's functional currency. TRL 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.

For further background to TRL's approach to foreign currency transactions and balances see page 23 of the 2018 Financial Statements.

Translation to functional currency

For a background to TRL's approach to translation to functional currency see page 23 of the 2018 Financial Statements.

Leasing arrangements

TRL had no operating or financial leasing arrangements during 2018.

D.2 Technical provisions

TRL 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 ("BEL") are the probability weighted average of future cash flows, discounted back to the relevant balance sheet date using risk free discount rates. These include all of the relevant cash inflows and outflows to meet the requirements of the policies TRL is obligated to at the valuation date.

- The risk margin represents an allowance for the cost of capital necessary to support the policies TRL 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.

TRL calculates its technical provisions using the sum of the best estimate liability ("BEL") and risk margin, therefore:

Technical Provisions = Best Estimate Liability + Risk Margin

Segmentation into lines of business

BELs 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). TRL has no non-life annuities and therefore there is no line of business disclosed for this category.

Lines of business for financial reporting purposes under IFRS are mapped to Solvency II lines of business according to "sub-department" classification in TRL's accounting system. The mapping is subject to allocations for certain sub-departments, which include private and commercial motor and multi-class lines of business. With the exception of these allocations, the sub-departments and Solvency II lines of business are in one-to-one correspondence.

Figure 24: Technical provisions by Solvency II line of business as at 31 December 2018

Solvency II line of business ($'000s)	Gross Best Estimate	Recoverables	Net	Risk Margin	Net TPs
Marine, aviation and transport insurance	177,702	101,790	75,912	7,136	83,048
Motor vehicle liability insurance	129,696	72,854	56,842	5,342	62,184
Fire and other damage to property insurance	122,348	71,660	50,688	4,765	55,453
Non-proportional marine, aviation and transport reinsurance	99,111	60,942	38,169	3,588	41,757
Non-proportional property reinsurance	95,883	62,261	33,622	3,161	36,783
Credit and suretyship insurance	53,452	30,668	22,784	2,142	24,926
Non-proportional casualty reinsurance	48,426	28,158	20,268	1,905	22,173
General liability insurance	37,429	22,056	15,373	1,445	16,818
Other motor insurance	22,888	12,855	10,033	943	10,976
Income protection insurance	4,649	2,798	1,851	174	2,025
Non-proportional health reinsurance	1,919	894	1,025	96	1,121
Miscellaneous financial loss	70	43	27	3	30
Total	**793,573**	**466,979**	**326,594**	**30,700**	**357,294**

Technical provisions bases, methodologies and key assumptions

Basis

TRL 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 25: IFRS to Solvency II reconciliation as at 31 December 2018

Solvency II line of business ($'000s)	Assumed	Ceded	Net
IFRS Technical Provisions	**1,082,941**	**673,117**	**409,824**
Less deferred acquisition costs	(56,146)	(43,311)	(12,835)
Add contingent acquisition costs	(13,837)	(8,517)	(5,320)
Reserving margins	(67,963)	(22,782)	(45,181)
Future premiums & acquisition costs	(142,303)	(86,106)	(56,197)
Future other expenses	51,783	-	51,783
Legally obliged unincepted business	(10,583)	(14,116)	3,533
Discounting	(50,319)	(31,045)	(19,274)
Counterparty default	-	(261)	261
Solvency II Best Estimate	**793,573**	**466,979**	**326,594**
Risk margin	30,700	-	30,700
Solvency II Technical Provisions	**824,273**	**466,979**	**357,294**

Figure 26: IFRS to SII reconciliation of gross technical provisions for top 5 Solvency II lines of business as at 31 December 2018

Solvency II Line of Business Gross ($'000s)	Marine, Aviation, Transport (Prop)	Motor Vehicle Liability (Prop)	Fire and Property (Prop)	Marine, Aviation, Transport (Non-prop)	Property (Non-prop)	Other	Total
IFRS technical provisions	246,682	179,631	168,347	116,771	125,284	246,226	1,082,941
Deferred acquisition costs	(15,956)	(9,597)	(15,923)	(142)	(364)	(14,164)	(56,146)
Contingent commission costs	481	(13,026)	4,013	116	(3)	(5,418)	(13,837)
Reserving margins	(8,979)	(7,506)	(13,803)	(3,491)	(8,958)	(25,226)	(67,963)
Future premiums & acquisition costs	(49,182)	(23,383)	(20,427)	(9,503)	(7,725)	(32,083)	(142,303)
Future other expenses	15,701	7,867	9,174	2,627	3,169	13,245	51,783
Legally obliged unincepted business	2,705	377	(626)	(1,462)	(9,980)	(1,597)	(10,583)
Discounting	(13,750)	(4,667)	(8,407)	(5,805)	(5,540)	(12,150)	(50,319)
Counterparty default	0	0	0	0	0	0	0
Solvency II best estimate	**177,702**	**129,696**	**122,348**	**99,111**	**95,883**	**168,833**	**793,573**
Risk margin	7,136	5,342	4,765	3,588	3,161	6,708	30,700
Solvency II technical provisions	**184,838**	**135,038**	**127,113**	**102,699**	**99,044**	**175,541**	**824,273**

Included within "other" are Credit and Suretyship which has gross IFRS technical provisions of $98,625k and a SII best estimate of $53,452k; and non-proportional Casualty which has gross IFRS technical provisions of $55,600k and a SII best estimate of $48,426k.

Figure 27: IFRS to SII reconciliation of net technical provisions for top 5 Solvency II lines of business as at 31 December 2018

Solvency II Line of Business Net ($'000s)	Marine, Aviation, Transport (Prop)	Motor Vehicle Liability (Prop)	Fire and Property (Prop)	Marine, Aviation, Transport (Non-prop)	Property (Non-prop)	Other	Total
IFRS technical provisions	99,592	73,692	67,967	37,783	31,164	99,626	409,824
Deferred acquisition costs	(3,788)	(1,569)	(4,417)	(71)	(107)	(2,883)	(12,835)
Contingent commission costs	192	(5,210)	1,605	46	214	(2,167)	(5,320)
Reserving margins	(9,352)	(5,773)	(10,404)	(1,314)	(2,103)	(16,235)	(45,181)
Future premiums & acquisition costs	(21,236)	(9,650)	(8,793)	(1,428)	(1,368)	(13,722)	(56,197)
Future other expenses	15,701	7,868	9,174	2,628	3,167	13,245	51,783
Legally obliged unincepted business	323	(586)	(1,092)	2,323	4,217	(1,652)	3,533
Discounting	(5,559)	(1,973)	(3,380)	(1,861)	(1,598)	(4,903)	(19,274)
Counterparty default	39	43	28	63	36	52	261
Solvency II best estimate	**75,912**	**56,842**	**50,688**	**38,169**	**33,622**	**71,361**	**326,594**
Risk margin	7,136	5,342	4,765	3,588	3,161	6,708	30,700
Solvency II technical provisions	**83,048**	**62,184**	**55,453**	**41,757**	**36,783**	**78,069**	**357,294**

BEL calculation method

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

Claims provision

TRL holds a claims provision that relates to claims events that are already incurred, regardless of whether these claims have been reported or not. The provision includes all cash flows associated with future benefits, expenses and premiums related to the claim events. TRL 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, "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;
- 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

TRL 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 expenses related to these events. TRL 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 have not been incurred;
- 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;
- less the best estimate of unpaid premiums that have not been earned.

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.
- Expected loss ratios (“ELR”) – for the latest underwriting years these 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 TRL uses (described above) are employed to estimate ultimate losses, including the delay between the claim being reported to the insurer, and the insurer reporting the claim to TRL. 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 TRL 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 TRL 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. TRL 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. TRL 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 risk free rates.

The starting point for the calculation of the future other expense cash flows is historical data for the payment of other expenses by calendar period. TRL 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, TRL 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

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

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, ENID 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

Technical provisions are not discounted under IFRS.

Under Solvency II, TRL 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 TRL. 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

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

Under Solvency II, the calculations of ceded 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, 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 estimated impact of the default. Unless reliable estimates of these losses are available, the adjustment is calculated using an assumed loss of 50%. With the exception of the TRC Quota Share, which is secured by the TRC Trust Agreement, TRL does not adjust the amounts recoverable to allow for deposits or collaterisation arrangements. The loss given default for the TRC Quota Share is reduced by the ratio of the current value of the collateral and the current outstanding and IBNR claims allocated to the TRC Quota Share.

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, as determined by Solvency II regulation.

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 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, TRL 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 TRL to denote a technical provision figure net of reinsurance.

Existing reinsurance

TRL employs both proportional and non-proportional retrocession.

With respect to proportional retrocession, outwards 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 retrocession, the calculation of recoverables is based on the principle of correspondence, but future premiums are subject to contractual minimums.

Future reinsurance purchases

To the extent that TRL has a history of renewing outwards non-proportional retrocession, the purchase of future outwards retrocession is assumed in the assessment of technical provisions under Solvency II. In particular, expected cash flows arising from future retrocession that will cover existing inwards contracts, but have 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

TRL writes a variety of coverages whose major risk factors materially impact the variability of TRL's loss reserves. In particular, TRL's portfolio has exposure to long-tail casualty lines of reinsurance business including some high excess layers of coverage in volatile long-tail classes such as professional indemnity and directors and officers.

At the primary insurance level (i.e. the insurer as opposed to reinsurer level), there are significant risk factors which contribute to the variability and unpredictability of loss cost trends and loss emergence patterns. As a reinsurer, TRL faces additional risk factors arising from its dependence upon the claims reserving and reporting practices of its cedants, which vary greatly by size, specialisation, degree of sophistication, and country of operation, and are subject to change without notice.

It is also inherently more difficult for reinsurers to quantify unpaid liabilities under long-tail coverages because it takes longer for credible loss experience to emerge compared to the initial writer of the risks. Similarly, the loss experience under non-proportional coverages can take relatively longer to emerge. TRL's portfolio includes exposure to high excess liability layers and casualty lines of business, for which loss cost trends are especially difficult to assess. In addition, a reinsurer's loss experience may vary due to a concentration of small risks occurring close together, which can impact several layers of coverage across different lines of business and across different cedants.

The variability in the loss cost trends, the difficulty inherent in estimating developing losses and infrequent but high impact events, and the correlation across reinsurance coverages and cedants all contribute to the risk of material uncertainty and deviation in TRL's loss reserves.

TRL continually assesses 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 incorporate 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 TRL'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, TRL 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, including obligations arising from legally obliged unincepted business.

With respect to unexpired periods of coverage, TRL's loss reserves include exposure to extreme or exceptional events, both natural and man-made. Unexpired periods of coverage relating to property and casualty reinsurance contracts of TRL 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;
- marine and aviation accidents
- riots; and
- other man-made disasters, including those that may result from terrorist activity.

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

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 TRL.

Sensitivity analysis for technical provisions

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

Figure 28: Technical provision sensitivities

	Exchange Rates		Interest Rates		Reserving Assumptions*	
Key assumptions	10%	-10%	1%	-1%	5%	-5%
Technical provisions	6%	-6%	-3%	3%	16%	-12%

* This sensitivity includes a +/-5% change to the ELR assumptions along with an adjustment of +/- 5% to the tail of the loss development.

Exclusions from technical provisions

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

Matching adjustment

TRL 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 TRL in the calculation of technical provisions.

Transitional measures to Technical Provisions (TMTP)

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

Transitional risk-free interest rate-term structure

TRL does not apply the Transitional risk-free interest rate term structure in the calculation of technical provisions.

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 TRL's Solvency II balance sheet, their Solvency II values and corresponding values shown in the 2018 financial statements are summarised in the table below.

Figure 29: Other liabilities – IFRS & Solvency II reconciliation as at 31 December 2018

($'000s)	Solvency II	Financial Statements	Difference
Insurance and intermediaries payables	9,655	9,482	173
Reinsurance payables	50,781	155,013	(104,232)
Payables (trade, not insurance)	7,388	38,816	(31,428)
Total other liabilities	**67,824**	**203,311**	**(135,487)**
Technical provisions	824,273	1,082,941	(258,668)
Total liabilities	**892,097**	**1,286,252**	**(394,155)**

Total financial statement liabilities disclosed in this table agree with the statutory accounts value of $1,286,252k required for input to QRT, whereas total liabilities in the TRL IFRS financial statements are $1,329,561k. The difference represents the value of the reinsurers' share of deferred acquisition costs, which is included in the financial statements as a liability whereas in the QRT the net balance of deferred acquisition costs is presented as a net asset.

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

(Re)insurance and intermediaries payable

Please see Section D1 (Re)insurance and intermediaries receivable.

Payables (trade not insurance)

Please see Section D1 Other receivables (trade not insurance). The reduction in payables under Solvency II relates to accrued insurance related expenses not yet due, which have been moved to technical provisions (see Figure 24).

Provisions

At 31 December 2018, TRL held no provisions in its Financial Statements or on its Solvency II balance sheet.

Contingent liabilities

TRL does not consider any contingent liabilities to exist as at 31 December 2018.

Employee benefits

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

Aggregation of liabilities

TRL does not aggregate liabilities into material classes other than those reported in the balance sheet QRT (S.02.01.02).

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

TRL no longer holds any investments classified as level 3 under IFRS 13; in the prior year 0.4% of the portfolio was classified as Level 3.

Further information on alternative methods used for the valuation of assets other than technical provisions is included in D.1 under “Fair value of investments”. There are no alternative valuation techniques for any of those material classes of other liabilities described in D.3. Section D.2 sets out the main differences in the valuation of insurance reserves under IFRS and technical provisions for Solvency II.

D.5 Any other information

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

E. Capital management

E.1 Own funds

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

In addition, TRL recognises a reconciliation reserve of $22,952k (2017: $11,086k) which is classified as Tier 1 own funds and a deferred tax asset which is classified as Tier 3 own funds. Tier 3 Net Deferred Tax Assets are not eligible to cover the MCR. None of the other limits are exceeded. As at 31 December 2018, the available own funds of TRL were as follows:

Figure 30: Eligible own funds by tier

Tier	Instruments	At 31 December ($'000s)	
		2018	2017
Tier 1	Ordinary share capital Reconciliation reserve	500,000 22,952	500,000 11,086
Tier 2	Not applicable	-	-
Total own funds to cover MCR		**522,952**	**511,086**
Tier 3	Net Deferred tax asset	2,712	1,153
Total own funds to cover SCR		**525,664**	**512,239**

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

The reconciliation reserve of $22,952k is calculated below and is dependent on the level of excess assets over liabilities, the values of Ordinary Share Capital, Deferred Tax Assets and Restricted Own Fund Items. 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. Within the reconciliation reserve there was a change in Restricted Own Funds Items of $10,658k. There were no other material changes in the reconciliation reserve and net deferred tax asset over the reporting period.

Figure 31: Reconciliation Reserve

Reconciliation Reserve	At 31 December ($'000s)	
	2018	2017
Excess of assets over liabilities	**528,612**	**525,845**
Less:		
Ordinary share capital	(500,000)	(500,000)
Deferred tax asset	(2,712)	(1,153)
Restricted Own Fund items	(2,948)	(13,606)
Reconciliation reserve	**22,952**	**11,086**

Every quarter TRL 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 Management Committee and Risk & Audit Committee as part of the ongoing review process. Included in the analysis is a forward looking review that takes into consideration TRL's three year planning horizon. There have been no material changes to own funds during the year.

The overall objective of TRL, in relation to own funds, is to maintain a suitable buffer of Tier 1 capital above the SCR ensuring the levels of own funds within TRL are within its risk appetite.

As part of TRL's ORSA process (see Section B) a number of stress tests are undertaken to determine the impact on TRL's own funds and whether they would deteriorate below the required Tier 1 buffer.

TRL has a range of actions at its disposal, which are designed to mitigate the impact of any extreme or unusual scenarios causing its capital position to deteriorate. These include:

- the ability to call on additional capital under a Capital Maintenance Agreement with its parent company TRC;
- revisions to the TRL business plan, such as changes to the composition of business; and
- the purchase of additional retrocession.

As set out in TRL'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 TRL to fail to meet any applicable capital or solvency requirement, including its SCR.

Below is an explanation of material differences between the net assets in TRL's 2018 Financial Statements and the excess of assets over liabilities as calculated for solvency purposes:

Figure 32: IFRS to Solvency II Reconciliation as at 31 December 2018

	($'000s)	Description
IFRS net assets	**520,641**	
Change in:		
Net deferred acquisition costs	(12,837)	Adjustment from IFRS insurance reserves to Solvency II TPs
(Re)insurance receivables	(165,577)	Estimated premium and contingent commission reserve not yet due moved to TPs
(Re)insurance recoverables	(206,138)	Adjustment from reinsurer's share of IFRS insurance reserves to Solvency II TPs
(Re)insurance payables	104,060	Estimated premium and contingent commission reserve not yet due moved to TPs
Other payables	31,428	Accrued insurance related expenses not yet due moved to TPs
Technical provisions	289,368	Adjustment from IFRS insurance reserves to Solvency II TPs
Risk margin	(30,700)	Inclusion of Solvency II risk margin
Deferred tax asset	(1,633)	Pre-tax change in net assets x 17% deferred tax rate
Solvency II excess of assets over liabilities	**528,612**	

The principal differences between 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 estimated premium, 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, Section D2 for a reconciliation between the IFRS and Solvency II technical provisions and Section D3 for other liabilities.

A reduction to own funds (via the reconciliation reserve) is made for any restricted own fund items within a ring-fenced fund. TRL has deposits to cedants (comprising funds withheld and formal trusts), a portion of which represents ring-fenced funds. TRL estimates the surplus assets in such deposits, and deducts them from eligible own funds as an adjustment to own funds for ring-fenced funds.

TRL 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.

TRL 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

TRL uses the Solvency II Standard Formula ("SF"), a partial internal model for certain sub-modules and a capital add on ("CAOn") described below to calculate its SCR.

Figure 33: Solvency II capital requirements as at 31 December 2018

	2018 ($'000s)	2017 ($'000s)
Eligible Own Funds to cover SCR	525,664	512,239
Eligible Own Funds to cover MCR	522,952	511,086
Minimum Capital Requirement	81,161	90,868
Basic Solvency Capital Requirement	285,836	274,049
Operational risk	23,808	21,969
Capital add-on	15,000	67,452
Solvency Capital Requirement	**324,644**	**363,470**
Market risk	59,141	52,961
Counterparty default risk	29,164	31,036
Health underwriting risk	16,558	17,828
Non-life underwriting risk*	246,946	236,333
less Diversification	(65,973)	(64,109)
Basic Solvency Capital Requirement:	**285,836**	**274,049**
Non-life catastrophe risk*	135,470	113,732
Non-life premium & reserve risk	171,789	176,558
Non-life lapse risk	38,507	41,298
less diversification	(98,820)	(95,255)
Non-life underwriting risk:	**246,946**	**236,333**

* SF risk modules where the PIM has been applied.

TRL's SCR decreased by $38.8 million during 2018, owing primarily to the approval of the PIM, which increased the SCR by $14.7 million compared to the SF; the removal of the corresponding CAOn of £50 million; and the addition of the CAOn of $15 million with respect to the planned enhancement to the PIM. There have been no other material changes during the year.

TRL 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 TRL 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; and
- Article 112: simplified calculation of the risk adjusted value of collateral to take into account the economic effect of the collateral.

These simplifications relate to the counterparty default risk module.

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

The final amount of the Solvency Capital Requirement is still subject to supervisory assessment.

Partial Internal Model & Capital add-on

During 2018, TRL submitted an application to the PRA to replace the following two sub-modules of the SF with a PIM:

- natural catastrophe risk; and
- catastrophe risk of non-proportional property reinsurance.

During the period of the application, TRL maintained a CAOn of £50 million as part of its SCR. Effective 31 December 2018, TRL's application was approved by the PRA and the CAOn was removed.

TRL has submitted a transitional plan to enhance the PIM to include man-made catastrophe risk and other catastrophe risk. The application for approval of the enhancements to the PIM is expected to be filed during 2019. Until the enhancements to the PIM are approved, TRL is required to maintain a CAOn of $15.0 million.

All data used in the PIM is reviewed at least annually and updated appropriately to ensure it is fit for use. TRL integrates the results of its PIM with the SF using method 4 as described in the delegated acts.

TRL's SCR is the sum of the SF including the PIM and the CAOn.

Calculation of the MCR

In order to calculate the MCR, TRL uses the net written premiums on a Solvency II basis split by Solvency II line of business. Written premiums are defined in Article 1(11) of Delegated Regulation (EU) 2015/35 as the premiums due to be received by the undertaking during the period under consideration regardless of whether such premiums relate in whole or in part to insurance or reinsurance cover provided in a different time period.

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.

TRL's linear MCR does not fall within the SCR corridor, which is calculated as between 25% and 45% of its SCR. By falling below the 25% floor and therefore in order to comply with Solvency II, TRL has set its current MCR at 25% of its SCR.

Aside from the approval of the PIM and the change in CAOn, there have been no changes to TRL'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

TRL 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

At present, TRL uses a PIM to calculate the SCR for natural catastrophe risk and the catastrophe risk of non-proportional reinsurance property as shown in Section C.

In order to calculate the Solvency Capital Requirement using the PIM, TRL utilises a third party Catastrophe Model to model the frequency and severity of events for windstorm, earthquake and flood allowing for the dependencies between regions and perils. The third party Catastrophe Modelling software uses exposure data which is input by TRL. TRL usually receives exposure data from third party sources for the purposes of modelling cedant exposures. This data arrives in a variety of formats, quality and completeness. Exposure data attempts to capture risk information for a portfolio which ranges from primary and secondary characteristics to policy terms and inuring reinsurance. All data used in the PIM is reviewed at least annually and updated if needed to ensure it is fit for use.

TRL's PIM compares to the SF which calculates the SCR for natural catastrophe risk and catastrophe risk of non-proportional property using shocks based on exposures and earned premiums.

Consistent with the SF, the risks in TRL's PIM are calibrated to a 99.5% confidence level over a one year time period.

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 TRL.

E.6 Any other information

TRL does not consider there is any other material information to disclose regarding capital management.

Appendix 1: Abbreviations used in this report

ABS	Asset Backed Securities
A.M. Best	A.M. Best Company, Inc. and/or its affiliates
Alleghany	Alleghany Corporation
BEL	Best Estimate Liabilities
BF	Bornhuetter-Ferguson
BlackRock	BlackRock, Inc and BlackRock Investment Management (UK) Limited
bps	Basis points (0.01%)
CAO	Chief Administration Officer
CAOn	Capital Add On
CCD	Corporate Compliance Department
CCO	Chief Compliance Officer (New York)
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CMBS	Commercial Mortgage Backed Security
CPD	Continuing Professional Development
CRO	Chief Risk Officer (New York)
CUO	Chief Underwriting Officer
Calpe	Calpe Insurance Company Limited (Gibraltar)
Certification Function	Any function identified as a certification function under the SM&CR
DAC	Deferred Acquisition Costs
EIOPA	European Insurance and Occupational Pensions Authority
ELR	Expected Loss Ratio
ENID	Events not in Data
EPIFP	Expected Profit included in Future Premiums
ERM	Enterprise Risk Management
ETFs	Exchange Traded Funds
EU	European Union
FCA	Financial Conduct Authority
Fitch	Fitch Ratings, Inc., Fitch Ratings, Ltd. and its subsidiaries
GBP	Great Britain Pound
GRM	Global Risk Management
HR	Human Resources
IBNER	Incurred but not Enough Reported
IBNR	Incurred but not Reported
ICE	ICE Data Services
IFRS	International Financial Reporting Standards
iNED	Independent Non-executive Director
ISA	International Standards on Auditing
ILS	Insurance Linked Securities
IT	Information Technology
KYC	Know Your Counterparty
LAE	Loss Adjustment Expenses
LBO	TRC London Branch Office

LDF	Loss Development Factors
LTF	Loss Trend Factors
MAT	Marine, Aviation and Transport
MBS	Mortgage Backed Securities
MCR	Minimum Capital Requirement
Moody's	Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their affiliates
NatWest	National Westminster Bank
NAV	Net Asset Value
NEAM	New England Asset Management
NED	Non-executive Director
(NYSE: Y)	New York Stock Exchange
ORSA	Own Risk and Solvency Assessment
PIM	Partial Internal Model
PRA	Prudential Regulation Authority
QRT	Quantitative Reporting Template
RCO	Regional Compliance Officer
RSR	Regular Supervisory Report
S&P	Standard & Poor's Financial Services LLC and/or its affiliates
SCR	Solvency Capital Requirement
SF	Standard Formula
SFCR	Solvency and Financial Condition Report
SII	Solvency II Directive
SM&CR	The Senior Managers and Certification Regime
SMF	Senior Manager Function under the SM&CR
SPV	Special Purpose Vehicles
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
TRC Quota Share	The quota share reinsurance agreement described in Section B1
TRC Trust Agreement	The trust agreement described in Section B1
TReIMCo	TReIMCo Limited, a Corporate Member at Lloyd's
TRH	Transatlantic Holdings, Inc.
TRL	TransRe London Limited
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 (QRTs)

Templates		
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.25.02.21 PIM	Solvency Capital Requirement - for undertakings on Standard Formula and partial internal model	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	2,712
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)	757,202
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*	726,815
R0140	*Government Bonds*	236,405
R0150	*Corporate Bonds*	285,695
R0160	*Structured notes*	0
R0170	*Collateralised securities*	204,715
R0180	*Collective Investments Undertakings*	30,387
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:	466,979
R0280	*Non-life and health similar to non-life*	466,979
R0290	*Non-life excluding health*	463,287
R0300	*Health similar to non-life*	3,692
R0310	*Life and health similar to life, excluding index-linked and unit-linked*	0
R0320	*Health similar to life*	0
R0330	*Life excluding health and index-linked and unit-linked*	0
R0340	*Life index-linked and unit-linked*	0
R0350	Deposits to cedants	22,013
R0360	Insurance and intermediaries receivables	42,015
R0370	Reinsurance receivables	57,854
R0380	Receivables (trade, not insurance)	14,203
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	57,731
R0420	Any other assets, not elsewhere shown	0
R0500	**Total assets**	1,420,709

S.02.01.02

Balance sheet

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions - non-life	824,273
R0520	*Technical provisions - non-life (excluding health)*	817,434
R0530	*TP calculated as a whole*	0
R0540	*Best Estimate*	787,004
R0550	*Risk margin*	30,430
R0560	*Technical provisions - health (similar to non-life)*	6,839
R0570	*TP calculated as a whole*	0
R0580	*Best Estimate*	6,569
R0590	*Risk margin*	270
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
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)*	0
R0660	*TP calculated as a whole*	0
R0670	*Best Estimate*	0
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	9,655
R0830	Reinsurance payables	50,781
R0840	Payables (trade, not insurance)	7,388
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**	892,097
R1000	**Excess of assets over liabilities**	528,612

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	0	0	14	1,462	0	0	0	0	0					1,476
R0120	Gross - Proportional reinsurance accepted	0	4,658	0	98,148	17,320	115,965	105,218	29,728	73,766	0	0	67					444,870
R0130	Gross - Non-proportional reinsurance accepted													7,011	15,688	46,109	85,356	154,164
R0140	Reinsurers' share	0	2,795	0	58,889	10,392	69,587	64,054	17,837	44,258	0	0	40	4,454	9,413	32,071	67,305	381,095
R0200	Net	0	1,863	0	39,259	6,928	46,392	42,626	11,891	29,508	0	0	27	2,557	6,275	14,038	18,051	219,415
	Premiums earned																	
R0210	Gross - Direct Business	0	0	0	0	0	10	1,418	0	0	0	0	0					1,428
R0220	Gross - Proportional reinsurance accepted	0	4,240	0	94,558	16,687	117,377	106,856	28,188	68,808	0	0	66					436,780
R0230	Gross - Non-proportional reinsurance accepted													7,094	15,509	45,775	85,090	153,468
R0240	Reinsurers' share	0	2,544	0	56,739	10,013	70,432	65,359	16,913	41,284	0	0	40	4,500	9,305	31,730	67,126	375,985
R0300	Net	0	1,696	0	37,819	6,674	46,955	42,915	11,275	27,524	0	0	26	2,594	6,204	14,045	17,964	215,691
	Claims incurred																	
R0310	Gross - Direct Business	0	0	0	0	0	5	2,154	0	0	0	0	0					2,159
R0320	Gross - Proportional reinsurance accepted	0	2,967	0	75,003	13,236	92,935	75,403	19,032	34,003	0	0	45					312,624
R0330	Gross - Non-proportional reinsurance accepted													1,330	13,735	21,971	34,277	71,313
R0340	Reinsurers' share	0	1,780	0	45,008	7,943	55,643	46,801	11,419	20,373	0	0	27	798	8,235	13,615	27,559	239,201
R0400	Net	0	1,187	0	29,995	5,293	37,297	30,756	7,613	13,630	0	0	18	532	5,500	8,356	6,718	146,895
	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	732	0	9,347	1,649	16,638	16,804	4,468	13,529	0	0	11	403	612	2,621	5,018	71,832
R1200	**Other expenses**																	
R1300	**Total expenses**																	71,832

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			GI	ES	US	BM	MT	
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
	Premiums written							
R0110	Gross - Direct Business	1,367	0	0	0	0	0	1,367
R0120	Gross - Proportional reinsurance accepted	211,286	100,896	37,087	11,103	16,243	14,251	390,866
R0130	Gross - Non-proportional reinsurance accepted	92,348	6,970	703	10,027	3,180	778	114,006
R0140	Reinsurers' share	203,425	64,727	22,674	12,953	11,676	9,019	324,474
R0200	Net	101,576	43,139	15,116	8,177	7,747	6,010	181,765
	Premiums earned							
R0210	Gross - Direct Business	1,330	0	0	0	0	0	1,330
R0220	Gross - Proportional reinsurance accepted	213,838	106,507	18,498	12,584	13,984	5,875	371,286
R0230	Gross - Non-proportional reinsurance accepted	92,164	7,026	736	9,884	3,134	801	113,745
R0240	Reinsurers' share	204,613	68,132	11,541	14,098	10,294	4,008	312,686
R0300	Net	102,719	45,401	7,693	8,370	6,824	2,668	173,675
	Claims incurred							
R0310	Gross - Direct Business	2,154	0	0	0	0	0	2,154
R0320	Gross - Proportional reinsurance accepted	144,204	84,731	10,665	11,206	8,026	4,967	263,799
R0330	Gross - Non-proportional reinsurance accepted	53,659	5,421	380	-465	-361	328	58,962
R0340	Reinsurers' share	123,900	54,092	6,627	9,982	4,600	3,177	202,378
R0400	Net	76,117	36,060	4,418	759	3,065	2,118	122,537
	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**	37,412	10,615	7,567	2,548	2,759	1,066	61,967
R1200	**Other expenses**							0
R1300	**Total expenses**							61,967

S.17.01.02

Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance												Accepted non-proportional reinsurance				Total Non-Life obligation
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		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	1,424	0	791	140	9,935	6,863	3,154	-8,487	0	0	22	-2,665	-1,708	-4,867	-16,965	-12,363
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	924	0	569	98	7,053	5,400	2,293	-3,597	0	0	14	-1,788	-1,449	-1,167	-17,950	-9,600
R0150	**Net Best Estimate of Premium Provisions**	0	500	0	222	42	2,882	1,463	861	-4,890	0	0	8	-877	-259	-3,700	985	-2,763
	Claims provisions																	
R0160	Gross	0	3,225	0	128,905	22,748	167,767	115,485	34,275	61,939	0	0	48	4,584	50,134	103,978	112,848	805,936
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	1,874	0	72,285	12,757	94,737	66,260	19,763	34,265	0	0	29	2,682	29,607	62,109	80,211	476,579
R0250	**Net Best Estimate of Claims Provisions**	0	1,351	0	56,620	9,991	73,030	49,225	14,512	27,674	0	0	19	1,902	20,527	41,869	32,637	329,357
R0260	**Total best estimate - gross**	0	4,649	0	129,696	22,888	177,702	122,348	37,429	53,452	0	0	70	1,919	48,426	99,111	95,883	793,573
R0270	**Total best estimate - net**	0	1,851	0	56,842	10,033	75,912	50,688	15,373	22,784	0	0	27	1,025	20,268	38,169	33,622	326,594
R0280	**Risk margin**	0	174	0	5,342	943	7,136	4,765	1,445	2,142	0	0	3	96	1,905	3,588	3,161	30,700
	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	4,823	0	135,038	23,831	184,838	127,113	38,874	55,594	0	0	73	2,015	50,331	102,699	99,044	824,273
R0330	**Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total**	0	2,798	0	72,854	12,855	101,790	71,660	22,056	30,668	0	0	43	894	28,158	60,942	62,261	466,979
R0340	**Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total**	0	2,025	0	62,184	10,976	83,048	55,453	16,818	24,926	0	0	30	1,121	22,173	41,757	36,783	357,294

S.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020 Accident year / underwriting year: Underwriting Year

Gross Claims Paid (non-cumulative)
(absolute amount)

	Year	C0010 0	C0020 1	C0030 2	C0040 3	C0050 4	C0060 5	C0070 6	C0080 7	C0090 8	C0100 9	C0110 10 & +	C0170 In Current year	C0180 Sum of years (cumulative)
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	0	0	0	0	0	0	0	0				0	0
R0190	2012	0	0	0	0	0	0	0					0	0
R0200	2013	0	0	0	0	0	0						0	0
R0210	2014	9,367	93,240	87,431	59,227	20,595							20,595	269,860
R0220	2015	7,271	82,550	95,990	49,522								49,522	235,333
R0230	2016	10,183	101,044	91,114									91,114	202,341
R0240	2017	5,023	126,618										126,618	131,641
R0250	2018	4,602											4,602	4,602
R0260												Total	292,451	843,777

Gross Undiscounted Best Estimate Claims Provisions
(absolute amount)

	Year	C0200 0	C0210 1	C0220 2	C0230 3	C0240 4	C0250 5	C0260 6	C0270 7	C0280 8	C0290 9	C0300 10 & +	C0360 Year end (discounted data)
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	0	0	0	0	0	0	0	0				0
R0190	2012	0	0	0	0	0	0	0					0
R0200	2013	0	0	0	0	0	0						0
R0210	2014	159,241	218,353	142,742	95,780	74,090							71,699
R0220	2015	157,424	208,101	151,815	99,031								95,262
R0230	2016	159,267	225,685	174,341									168,122
R0240	2017	280,340	299,298										288,420
R0250	2018	188,666											182,433
R0260												Total	805,936

S.23.01.01

Own Funds

	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
R0010	Ordinary share capital (gross of own shares)	500,000	500,000		0	
R0030	Share premium account related to ordinary share capital	0	0		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	22,952	22,952			
R0140	Subordinated liabilities	0		0	0	0
R0160	An amount equal to the value of net deferred tax assets	2,712				2,712
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**	525,664	522,952	0	0	2,712
	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	525,664	522,952	0	0	2,712
R0510	Total available own funds to meet the MCR	522,952	522,952	0	0	
R0540	Total eligible own funds to meet the SCR	525,664	522,952	0	0	2,712
R0550	Total eligible own funds to meet the MCR	522,952	522,952	0	0	
R0580	**SCR**	324,644				
R0600	**MCR**	81,161				
R0620	**Ratio of Eligible own funds to SCR**	161.92%				
R0640	**Ratio of Eligible own funds to MCR**	644.34%				

	Reconcilliation reserve	C0060
R0700	Excess of assets over liabilities	528,612
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	
R0730	Other basic own fund items	502,712
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	2,948
R0760	**Reconciliation reserve**	22,952
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	0
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	111,193
R0790	**Total Expected profits included in future premiums (EPIFP)**	111,193

S.25.02.21

USP Key	USP Key	USP Key
For life underwriting risk: 1 - Increase in the amount of annuity benefits 9 - None	**For health underwriting risk:** 1 - Increase in the amount of annuity benefits 2 - Standard deviation for NSLT health premium risk 3 - Standard deviation for NSLT health gross premium risk 4 - Adjustment factor for non-proportional reinsurance 5 - Standard deviation for NSLT health reserve risk 9 - None	**For non-life underwriting risk:** 4 - Adjustment factor for non-proportional reinsurance 6 - Standard deviation for non-life premium risk 7 - Standard deviation for non-life gross premium risk 8 - Standard deviation for non-life reserve risk 9 - None

Solvency Capital Requirement -
for undertakings using the standard formula and partial internal model

	Unique number of component	Component description	Calculation of the Solvency Capital Requirement	Amount modelled	USP	Simplifications
Row	C0010	C0020	C0030	C0070	C0090	C0120
1	1	Market risk	59,141		9	
2	2	Counterparty default risk	29,164		9	Counterparty default risk
3	4	Health underwriting risk	16,558		9	
4	5	Non-life underwriting risk	246,946	116,195	9	
5	7	Operational risk	23,808		9	

S.25.02.21

Solvency Capital Requirement - for undertakings using the standard formula and partial internal model

	Calculation of Solvency Capital Requirement	C0100
R0110	Total undiversified components	375,617
R0060	Diversification	-65,973
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	
R0200	**Solvency capital requirement excluding capital add-on**	309,644
R0210	Capital add-ons already set	15,000
R0220	**Solvency capital requirement**	324,644
	Other information on SCR	
R0300	Amount/estimate of the overall loss-absorbing capacity of technical provisions	
R0310	Amount/estimate of the overall loss-absorbing capacity ot deferred taxes	
R0400	Capital requirement for duration-based equity risk sub-module	
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	
R0420	Total amount of Notional Solvency Capital Requirement for ring fenced funds	
R0430	Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	
R0440	Diversification effects due to RFF nSCR aggregation for article 304	

S.28.01.01

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

Linear formula component for non-life insurance and reinsurance obligations

		C0010
R0010	MCR_{NL} Result	65,617

		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	1,851	1,673
R0040	Workers' compensation insurance and proportional reinsurance	0	0
R0050	Motor vehicle liability insurance and proportional reinsurance	56,842	34,421
R0060	Other motor insurance and proportional reinsurance	10,033	6,074
R0070	Marine, aviation and transport insurance and proportional reinsurance	75,912	43,780
R0080	Fire and other damage to property insurance and proportional reinsurance	50,688	42,563
R0090	General liability insurance and proportional reinsurance	15,373	10,956
R0100	Credit and suretyship insurance and proportional reinsurance	22,784	29,946
R0110	Legal expenses insurance and proportional reinsurance	0	0
R0120	Assistance and proportional reinsurance	0	0
R0130	Miscellaneous financial loss insurance and proportional reinsurance	27	27
R0140	Non-proportional health reinsurance	1,025	2,524
R0150	Non-proportional casualty reinsurance	20,268	5,978
R0160	Non-proportional marine, aviation and transport reinsurance	38,169	13,369
R0170	Non-proportional property reinsurance	33,622	17,716

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	0	
R0250	Total capital at risk for all life (re)insurance obligations		0

Overall MCR calculation

		C0070
R0300	Linear MCR	65,617
R0310	SCR	324,644
R0320	MCR cap	146,090
R0330	MCR floor	81,161
R0340	Combined MCR	81,161
R0350	Absolute floor of the MCR	4,188
R0400	**Minimum Capital Requirement**	81,161