Calpe Insurance Company Limited

Calpe Insurance Company Limited

Solvency and Financial Condition Report

As at 31 December 2019

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About this document

This document is the Solvency and Financial Condition Report ("SFCR") for Calpe Insurance Company Limited ("Calpe") as at 31 December 2019.

This SFCR covers Calpe on a solo basis.

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

Directors' statement

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

We are satisfied that:

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

By order of the Board on 7th April 2020.

Paul Cole
Director

Douglas Murray
Director

Executive summary

Calpe is a private limited company headquartered in Gibraltar and a wholly owned subsidiary of Transatlantic Reinsurance Company ("TRC"), a reinsurance company domiciled in New York, USA, whose ultimate parent undertaking is Alleghany Corporation ("Alleghany"), incorporated in Delaware, USA. Calpe is licensed by the Gibraltar Financial Services Commission and commenced underwriting in November 2010. Calpe's primary focus has been on writing United Kingdom ("UK") and Republic of Ireland motor business on a co-insurance basis and in support of Managing General Agents ("MGAs"). As part of the firm's Brexit plans, the vast majority of its direct insurance business in the Republic of Ireland was placed into orderly run-off in March 2019. These activities include all business written under compulsory classes of business.

Business and performance

Calpe delivered another strong performance, closing 2019 with a gross loss ratio of 80% (2018: 76%) and delivering a pre-tax operating profit of £0.88m (2018: £1.66). In line with the market, Calpe's niche motor portfolio saw rate increases continue through 2019, with Gross Written Premium (GWP) on a Solvency II basis of £100.1m increasing 15.6% over 2018. The firm's overall result was boosted by favourable investment returns as bond markets recovered the losses of 2018.

Calpe, in addition to motor classes, holds permission to write general liability and property and assistance classes of business. The plan in recent years has always been to diversify the portfolio, though not at the expense of diluting margin or profit. In 2018, the company secured an involvement with a niche casualty MGA, writing UK and Irish employers liability and public liability.

In the fourth quarter of 2019, A.M. Best reaffirmed the A+ rating for Calpe.

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

The personal lines market remains competitive. However, in light of the Lord Chancellor's decision to set the UK Discount Rate at minus 0.25% from minus 0.75% (reinsurers had expected a return to at least 0%), anticipated rising reinsurance costs and continued claims inflation, we expect further positive premium rate increases through 2020. While some insurers were prepared to give reductions during 2019 ahead of the anticipated (but not forthcoming) whiplash reforms, the contrasting increases in property damage and credit hire costs continue to have a material impact on claims inflation, and we started to see a return to a positive rating environment in the second half of 2019.

Covid-19

The global spread of the Covid-19 pandemic is unprecedented and its potential effects on Calpe are continually evolving. While Calpe does not expect to have any significant direct exposure to Covid-19 risks, premium volumes in certain sectors, for instance the taxi business, may be impacted, due to higher cancellations and lower conversion rates. We also expect to see more policies sold with short term cover, as consumers modify their buying behaviour. With fewer cars on the road, there is likely to be a reduction in loss frequency, though this may be offset to a degree by expected increased repair timings, increased credit hire charges and potentially theft.

Our claims handling teams are all operating "business as usual" and are actively responding to enquiries in a timely fashion. Regular meetings continue to be held between Calpe's senior management team to ensure the business continues to operate effectively. Calpe has well tested contingency plans in place both locally and within the wider group, to ensure service continuity while our staff work remotely and in the event of sickness.

As Calpe has a focus on short term fixed interest bonds with no exposure to equities, the investment portfolio valuation has held up well. We will continue to actively monitor the situation and our own exposure to it and respond to future developments as they arise.

System of governance

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

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

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

Calpe 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 to undertake their roles and responsibilities for overseeing Calpe.

Risk profile

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

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

In keeping with its risk appetite and tolerances, Calpe continues to purchase excess of loss ("XOL") reinsurance to protect its portfolio. The latest UK Discount Rate ruling caught the insurance and reinsurance market by surprise. At 1st January 2020 all reinsurance renewals experienced increased rates. In order to preserve insurance margins, original rates will also need to be increased further.

The majority of Calpe's policyholders are in the UK and we do not expect a significant impact on the firm's ability to service these customers as a result of the UK's decision to leave the European Union. However, there may be unintended consequences of Brexit, for example delays in the car spare parts supply chain, adversely affecting claims costs. Management are aware of, and will remain vigilant of, these emerging issues.

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.

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

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

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

Calpe uses its IFRS insurance liabilities as the starting point for determining the Solvency II technical provisions. Adjustments are made to move from the IFRS basis to the Solvency II basis. These adjustments are detailed in 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, with Tier 1 being the most able to do so.

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

Figure 1: Own funds by tier

Tier	Instrument	At 31 December (£'000s)	
		2019	2018
Tier 1	Ordinary paid up share capital	30	30
	Share premium related to ordinary share capital	29,970	29,970
	Reconciliation reserve	3,039	1,283
Tier 2	N/A		
Total own funds to cover MCR		**33,039**	**31,283**
Tier 3	Net deferred tax asset	268	264
Total own funds to cover SCR		**33,307**	**31,547**

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

Figure 2: Capital requirements

	At 31 December (£'000s)	
	2019	2018
Minimum capital requirement	5,886	5,713
Solvency capital requirement	23,546	22,854

Overall Calpe held 141% of its SCR capital requirements at 31 December 2019 (138% at 31 December 2018). The company's SCR increased marginally by £0.7 million to £23.5 million.

A. Business and performance

A.1 Business

Company information

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

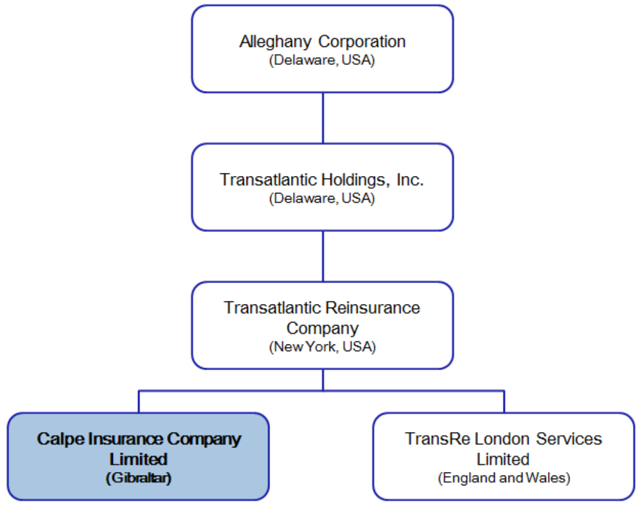
Calpe is a private limited company, limited by shares, with its registered office in Gibraltar. It is a wholly owned subsidiary of TRC, which is a reinsurance company domiciled in New York, USA. Calpe is headquartered in Gibraltar and is licensed by the Gibraltar Financial Services Commission and commenced underwriting on 1 November 2010.

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

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

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

Figure 3: Organisational structure chart



(All subsidiaries are 100% owned and controlled.)

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

TRC, together with some of its subsidiaries including Calpe, is rated A+ by A.M. Best.

Market commentary

Whilst this document is essentially a review of the 2019 year, the global magnitude of the Covid-19 situation necessitates further commentary.

Effective 11 March 2020, the World Health Organisation ("WHO") declared Covid-19 a 'pandemic'. The global spread of Covid-19 is unprecedented and the effects on both Calpe's underwriting and investment portfolio are continually evolving with events, consequences and impacts changing on a daily basis.

Calpe does not expect to have any significant direct exposure to losses arising from Covid-19 risks. However, the business may be impacted by reduced premium volumes in certain sectors of the account, in particular for taxi, where we anticipate a higher than normal premium policy cancellation rate and lower conversion ratios, given business activity in this market is expected to contract. Calpe also expects to see an increase in the level of policies sold providing short term cover, as consumers modify their buying behaviour in the face of possible changes in financial circumstances.

One positive aspect we expect to see, with fewer cars on the road, is a reduction in loss frequency. This should lead to a lower than expected loss ratio. To some degree, this will be offset by expected increased repair timings (labour and spare parts may suffer from reduced supply) which, in turn, may lead to an increase in credit hire charges. As has been seen in prior recessionary conditions, we may experience higher incidents of theft. Our claims handling teams are all operating "business as usual" and are actively responding to enquiries in a timely fashion. We will be monitoring any uptick in complaints arising from service level issues should they arise and will react accordingly.

During this time, regular meetings are held between Calpe's senior management team to ensure business processes continue to operate effectively.

Calpe personnel are all working remotely, and we anticipate that will continue for some time. Personnel feedback has been generally positive, and we work to ensure it will remain so over a longer period. Essential business interactions with policyholders and business partners continue digitally and all business-critical processes are being reviewed regularly to ensure deadlines can be met. Although there will be some operational inconvenience, Calpe remains well positioned to support its key stakeholders, including its policyholders, personnel and business partners during this stressed time.

Further information on Covid-19 is provided in section C of this document.

In anticipation of the delayed whiplash reforms now expected to come into force in 2020, the first half of 2019 saw a softening of rates. This was short lived, however, as the increased costs in the property damage sectors more than offset the positive impact the whiplash reforms were expected to deliver. A positive rating environment returned in the fourth quarter. Claims frequency remained stable in 2019. Most of the challenges presented in 2019 were from inflationary pressures along with the need to remain vigilant on fraud and credit hire. The market continues to adopt more sophisticated tools to assist with improved risk selection and minimise exposure to fraudulent claimants.

Strategy and portfolio

Calpe'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.

In the current low yield investment environment, Calpe's focus on underwriting profitability is paramount to support the aim of book value growth. Premium income distribution by line of business shown in Figures 4 and 5.

Figure 4: Solvency II line of business (gross written premium) as at 31 December 2019

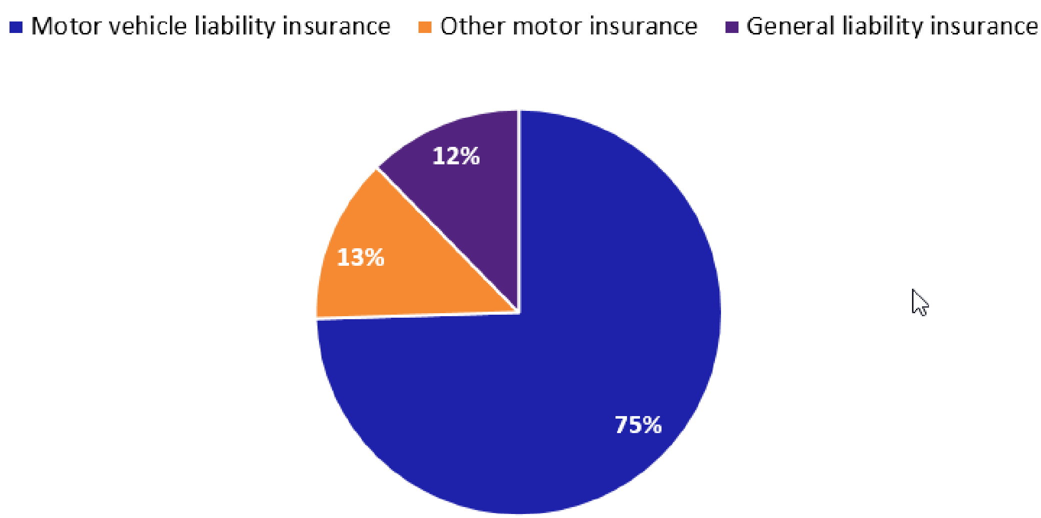
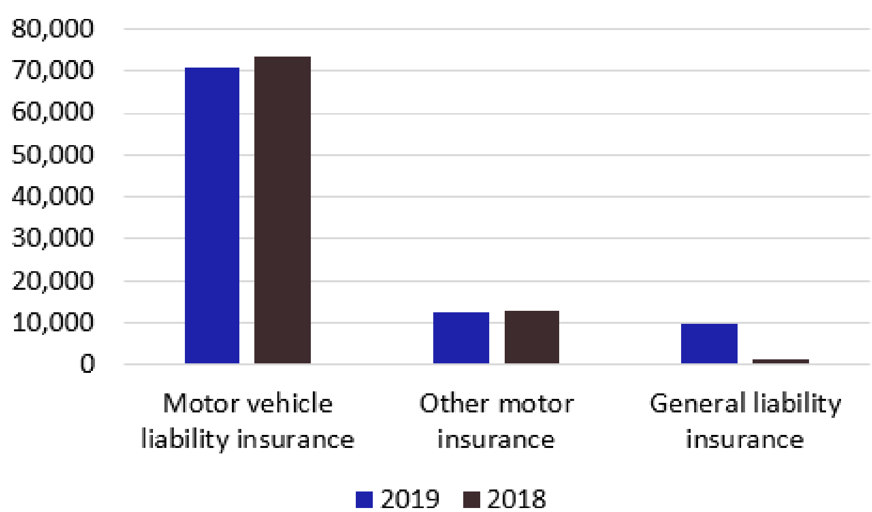


Figure 5: Solvency II line of business (gross earned premium £'000s)



As part of Calpe's strategy, the Board has been seeking to diversify the book of business into other classes of business. Calpe currently holds permission to write motor vehicle and motor vehicle liability, fire and natural forces, damage to property, general liability and assistance. We are seeing a flight to quality in the market and our A+ A.M. Best rating ensures that we continue to see a good submission flow of motor and non-motor classes.

The rating was instrumental in Calpe successfully negotiating terms to secure a new casualty (non-motor) programme, which covers an employers liability and public liability portfolio of risks, in May 2018 and which subsequently renewed in July 2019. This portfolio has no correlation or aggregation with Calpe's existing portfolio. Overall, the portfolio is, however, still dominated by UK motor, representing 75% of the portfolio.

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

No new classes of business were introduced in the current year.

A.2 Underwriting performance

The continued positive rating environment coupled with favourable run-off development is reflected in the profitability of the portfolio, with a net underwriting profit (excluding investment returns) of £400k for 2019 (2018: £824k). For more details on Calpe's underwriting performance, please refer to QRT S.05.01 in Appendix 2.

In the pursuit of profitability, Calpe continues to focus on underwriting quality, not premium volume. While 2019 gross written premium increased by 15.6% (£100.1m in 2019 vs £86.5m in 2018), this was below our budgeted figure of £118m. Calpe's renewal retention was 100% in 2019; however, one renewal was delayed to 1 January 2020.

Underwriting performance by line of business

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

Calpe predominantly writes UK motor business. For motor business, the Solvency II directive requires firms to report the firm's results split between motor vehicle liability and other motor business. For reporting purposes Calpe allocates the motor results between these reporting classes based on claims results by head of damage. Premiums are earned evenly over the risk period of the insurance policy. Calpe's loss ratio used to derive the claims incurred results is based on actuarial derived best estimate losses that are reviewed on a quarterly basis.

Figure 6a: Underwriting performance by Solvency II line of business (gross) 2019

Gross (£'000s)	Motor vehicle liability insurance	Other motor insurance	General liability insurance	Annuities	Total
Premiums written	74,580	13,161	12,329	0	100,070
Premiums earned	70,783	12,491	9,765	0	93,039
Claims incurred	(58,660)	(10,352)	(5,643)	12	(74,643)
Expenses	(11,628)	(2,052)	(3,361)	0	(17,041)
Underwriting profit/(loss)	495	87	761	12	1,355
Loss ratio	83%	83%	58%	0%	80%

Figure 6b: Underwriting performance by Solvency II line of business (net) 2019

Net (£'000s)	Motor vehicle liability insurance	Other motor insurance	General liability insurance	Annuities	Total
Premiums written	12,956	2,286	2,185	0	17,427
Premiums earned	12,333	2,176	1,729	0	16,238
Claims incurred	(9,789)	(1,727)	(956)	6	(12,466)
Expenses	(2,275)	(401)	(696)	0	(3,372)
Underwriting profit/(loss)	269	48	77	6	400
Loss ratio	79%	79%	55%	0%	77%

Figure 6c: Underwriting performance by Solvency II line of business (gross) 2018

Gross (£'000s)	Motor vehicle liability insurance	Other motor insurance	General liability insurance	Annuities	Total
Premiums written	69,239	12,219	5,072	0	86,530
Premiums earned	73,592	12,987	1,465	0	88,044
Claims incurred	(55,575)	(9,807)	(843)	(337)	(66,563)
Expenses	(14,785)	(2,609)	(541)	0	(17,935)
Underwriting profit/(loss)	3,232	570	81	(337)	3,547
Loss ratio	76%	76%	58%	0%	76%

Figure 6d: Underwriting performance by Solvency II line of business –(net) 2018

Net (£'000s)	Motor vehicle liability insurance	Other motor insurance	General liability insurance	Annuities	Total
Premiums written	11,605	2,048	900	0	14,553
Premiums earned	13,774	2,431	261	0	16,466
Claims incurred	(9,600)	(1,694)	(144)	(93)	(11,531)
Expenses	(3,400)	(600)	(111)	0	(4,111)
Underwriting profit/(loss)	774	137	6	(93)	824
Loss ratio	70%	70%	55%	0%	70%

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

A.3 Investment performance

Financial investments

Calpe's investment portfolio is made up exclusively of fixed income securities and cash. Fixed income securities comprise government and corporate bonds as shown in Figure 7a.

Total investment return

Total investment return includes investment income (comprising interest, and the amortisation of any discount or premium on available-for-sale debt securities), 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.

Over the financial year the investment portfolio made a total net gain of £2,267k (2018: net loss of £24k) resulting from increases in market value of the bond portfolio as yields dropped, combined with accrued interest income, which remained broadly in line with 2018. During the year there were no material changes to the asset allocation within the investment portfolio.

Figure 7a: Net investment return 2019

	Year to 31 December 2019			31 December 2019
Asset Category (£'000s)	**Income**	**Gains / (losses)**	**Net income/gain or (loss)**	**Total SII Value**
Cash and deposits	0	0	0	10,668
Corporate Bonds	642	1,176	1,818	28,947
Government Bonds	139	310	449	21,415
Total	**781**	**1,486**	**2,267**	**61,030**

Figure 7b: Net investment return 2018

	Year to 31 December 2018			31 December 2018
Asset Category (£'000s)	**Income**	**Gains / (losses)**	**Net income/gain or (loss)**	**Total SII Value**
Cash and deposits	0	0	0	4,258
Corporate Bonds	620	(751)	(131)	35,046
Government Bonds	170	(64)	107	18,832
Total	**790**	**(815)**	**(24)**	**58,136**

Investment income excludes investment management fees which are charged based on the assets under management during the period. Total fees charged in 2019 were £44.1k (2018: £46.4k).

Securitisations

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

Covid-19

The valuation of Calpe's investment portfolio has held up well in the first quarter due to the short-dated nature of fixed interest holdings and the overall high credit quality of the portfolio. Calpe has no exposure to equities.

A.4 Performance of other activities

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

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

A.5 Any other information

Brexit

On 31 January 2020, the UK formally left the EU. Under the terms of the EU/UK Withdrawal Agreement, a transition period is in place until 31 December 2020 (unless extended).

Uncertainties continue with respect to the UK/EU relationship at the end of the transition period, particularly from a regulatory perspective, although the EU/UK Political Declaration does commit both parties to a prompt assessment of equivalence.

The principal risks of Brexit to Calpe are a possible loss of access to EU insurance markets in the future, the risk of a customs and immigration barrier being established between Spain and Gibraltar and volatility in the value of Sterling.

As the majority of Calpe's business is with policyholders in the UK, Calpe does not anticipate that the possible loss of access to the single market will have a significant impact on its business and performance. Calpe ceased writing motor business in Ireland on 31 March 2018. Calpe will provide service continuity with respect to all live contracts with policyholders and all valid claims under live and expired contracts under the Irish temporary run-off regime.

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

The currency risk associated with Brexit is low because Calpe's assets and liabilities are predominantly held in Sterling. Non-Sterling insurance liabilities (principally Euro denominated) are matched with assets in the same currency. However, adverse fluctuations in the value of Sterling along with supply chain disruption arising from Brexit has both historical as well as future potential to adversely impact repair costs where motor vehicle replacement parts are sourced from the Eurozone.

Ogden rate

On 27 February 2017, the UK's Lord Chancellor significantly reduced the personal injury discount rate (known as the Ogden rate) from 2.5% to minus 0.75% resulting in large increases in reserves negatively impacting UK motor insurance and reinsurance earnings.

In December 2018, the Civil Liability Bill obtained Royal Assent and on 22 January 2019 the Government Actuary Department published a technical memorandum in respect of adjusting the discount rate. It was hoped that the new rate would be in the region of 0-0.5% which would have represented reserve savings for reinsurers (though no allowance for this anticipated change was made in Calpe's 2018 SFCR). In July 2019, disappointingly and against expectations, it was announced that the rate would only be raised to minus 0.25%. With the anticipated saving to reinsurers not materialising, insurers faced reinsurance costs significantly higher than expected at 1st January 2020.

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

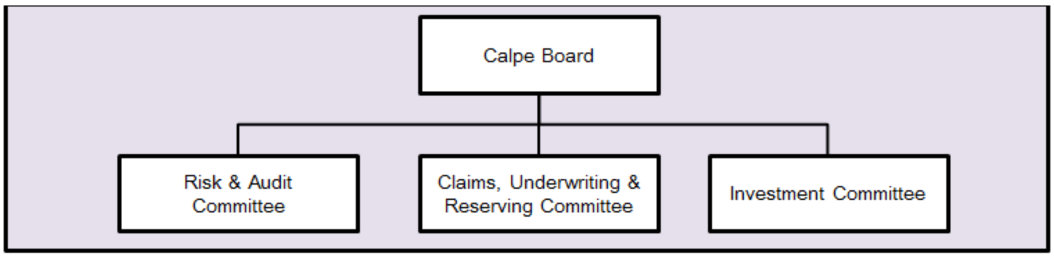
B. System of Governance

B.1 General information on the system of governance

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

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

Figure 8: Governance oversight



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

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

The following individuals were members of Calpe's Board and members of the sub committees of the Board as at 31 December 2019:

Figure 9: Calpe's Board

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

Chair of the Risk & Audit Committee

+ Chair of the Investment Committee

§ Chair of the Claims, Underwriting & Reserving Committee

During the year Geoffrey Peach retired and was replaced by Andy Gaudencio on the Board and its sub-committees.

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

Risk & Audit Committee

The Risk & Audit Committee's responsibilities include:

Risk

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

Audit

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

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

Investment Committee

The Investment Committee's responsibilities include:

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

The Investment Committee meets at least four times per year.

Claims, Underwriting & Reserving Committee

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

Underwriting

- considering new products, MGA and co-insurance opportunities and lines of business;
- establishing, recommending and maintaining oversight of the underwriting strategy (including reinsurance purchasing) and business planning activities;

- recommending underwriting risk appetites and tolerances and reinsurance requirements for Calpe, ensuring they are consistent with TransRe's group;
- reviewing underwriting performance, including pricing, claims trends, insurance buying patterns, competitor analysis, and conversion and lapse rates; and
- reviewing key aggregate management issues and development.

Claims

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

Reserving

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

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

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

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

Key functions

Calpe has identified the following functions as key functions:

Figure 10: Key functions and key function holders

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

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

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

There were no material changes in Calpe's governance structure in the year ended 31 December 2019, other than the change to the Board and Sub-committee composition referred to above, and which received regulatory approval.

Remuneration policies and practices

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

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

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

Material transactions with shareholders

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

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

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

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

Calpe has assessed the nature 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 Calpe'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

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

Timing of assessment

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

Nature of assessment

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

- the personal characteristics (including being of good repute and integrity);
- the level of competence, knowledge and experience;
- the qualifications; and
- undergone or is undergoing all training,

required to enable that person to perform his or her function effectively and in accordance with any relevant regulatory requirements and to enable sound and prudent management of Calpe.

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

Training and competency

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

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

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

B.3 Risk management system including the ORSA

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

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

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

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

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

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

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

Calpe's Risk Management function is integrated into the organisation through the reporting lines to Calpe's Risk Management function holder, Calpe's Risk & Audit Committee and ultimately through to TransRe's Chief Risk Officer ("CRO"). Calpe's Risk Management function holder is also a member of and participates in key decision-making forums.

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

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

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

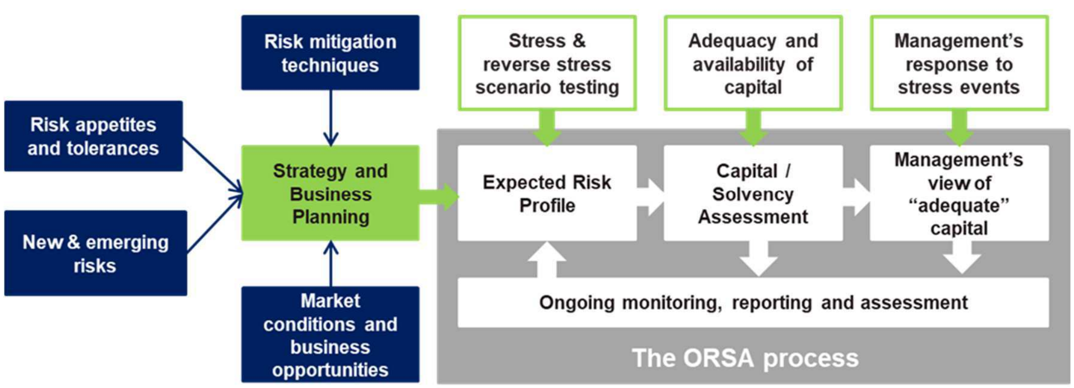
Own Risk and Solvency Assessment

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

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

The ORSA process can be diagrammatically represented as follows:

Figure 11: Calpe's ORSA process



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

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

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

B.4 Internal control system

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

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

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

The financial control framework is designed to ensure that:

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

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

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

Compliance function

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

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

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

The Compliance function's responsibilities include:

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

B.5 Internal Audit function

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

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

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

Calpe's internal audit coverage can be broken down into two streams. The first stream is handled by TransRe Internal Audit who cover audits of a global nature that may have a direct impact on Calpe business processes, i.e. technology, group policies, etc. For the second stream, Calpe utilises Mazars LLP in the UK to perform Calpe specific audits. Mazars provides local resources who report to Calpe's Risk & Audit Committee and TransRe's Director of Internal Audit. Utilising a third party enables Calpe to benefit from subject matter experts aligned with processes reviewed in the different business units. Mazars also benchmarks processes and controls against other insurance market participants, as appropriate.

B.6 Actuarial function

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

The Actuarial function is responsible for:

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

- overseeing the calculation of technical provisions in the cases set out in Article 82;
- expressing an opinion on the overall underwriting policy;
- expressing an opinion on the adequacy of reinsurance arrangements; and
- contributing to the effective implementation of the risk-management system.

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

B.7 Outsourcing

Outsourcing management

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

Claims handling is outsourced to third party firms either directly in respect of MGAs or indirectly via a claims handling agreement between the lead insurer and the claims handler where Calpe's role is as co-insurer.

Outsourcing of critical or important operational functions

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

Figure 12: Outsourcing of critical or important operational functions

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

B.8 Any other information

Calpe's system of governance has not materially changed during the year to 31 December 2019.

Covid-19

In response to the Covid-19 outbreak, Calpe implemented its disaster recovery plan. At the date of this document, Calpe and Artex personnel are all working remotely; a situation that we anticipate may continue for some time. However, there has been no material impact on Calpe's system of governance.

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

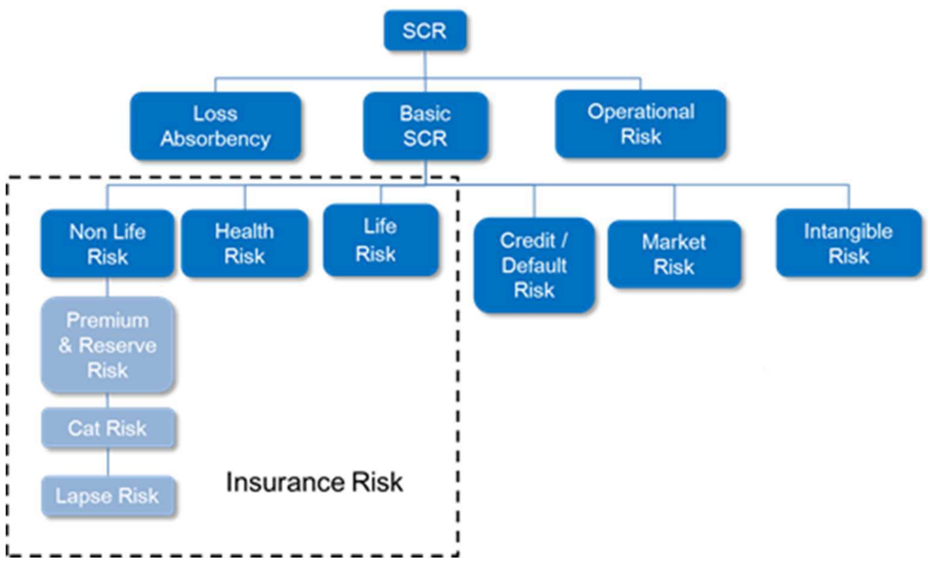
C. Risk profile

Calpe is a primary insurer with permission to write motor, property and general liability business. Key points regarding Calpe's risk profile are that it:

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

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

Figure 13: Standard Formula risk modules



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

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

C.1 Underwriting risk

Key underwriting risks to which Calpe is exposed include:

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

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

Premium / underwriting risk management

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

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

Calpe has developed robust underwriting selection procedures and potential co-insurance and MGA partners are subject to a comprehensive due diligence process prior to engaging with them. Once engaged, they are then subject to ongoing due diligence.

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

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

Reinsurance risk

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

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

Reserve risk management

Reserve risk is managed through the oversight provided by Calpe's Claims, Underwriting & Reserving Committee. Key controls to manage this risk include:

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

Risk sensitivity for underwriting risks

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

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

The results of the analysis showed that the most material impact on the SCR arose from prolonged poor underwriting results or through reserve deterioration (arising from poor/weak reserving methodology). The analysis undertaken indicated that it would take a significant event to breach the SCR. Calpe's underwriting risk profile is therefore resilient to withstand severe shocks 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, Calpe benefits from a robust risk management framework enabling effective oversight of Calpe's risk profile via various governance committees throughout Calpe and TransRe, including the ORSA process, Calpe's risk register and the stress and scenario testing Calpe performs.

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

Prudent person principle

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

C.2 Market risk

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

For Calpe, market risk comprises the following key components:

Figure 14: Standard Formula market risk sub-modules

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

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

Calpe's investment strategy forms the basis for the mandate given to Calpe's asset managers (BlackRock). The mandate includes limits on certain classes and types of investments, restriction on investments in certain industries, sector and geographical limits and a prohibited list of companies. The execution of Calpe's investment strategy is subject to ongoing monitoring and scrutiny by the Investment Committee.

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

Calpe is exposed to the following key market risks:

Interest rate risk

Movements in interest rates affect the amount and timing of cash flows for Calpe 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, Calpe adheres to investment policy guidelines developed by Calpe's Board in line with Calpe's strategy and TransRe's overall objectives. These guidelines direct Calpe to invest in high-quality issuers and, in particular, the strategy is to position its fixed income securities based on its view of future interest rates and the yield curve, balanced with liquidity requirements.

Spread risk

This risk relates to the potential financial loss Calpe may suffer due to a change in the spread that a fixed interest security trades at when compared to a comparable government bond. Calpe is exposed to spread risk as it maintains a large amount of corporate bonds within the investment portfolio as shown in Figure 15.

Foreign currency risk

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

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

Figure 15: Portfolio composition as at 31 December 2019

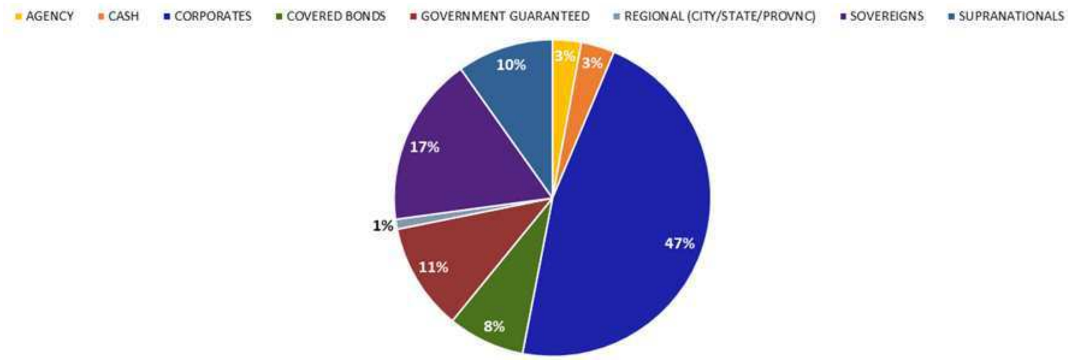
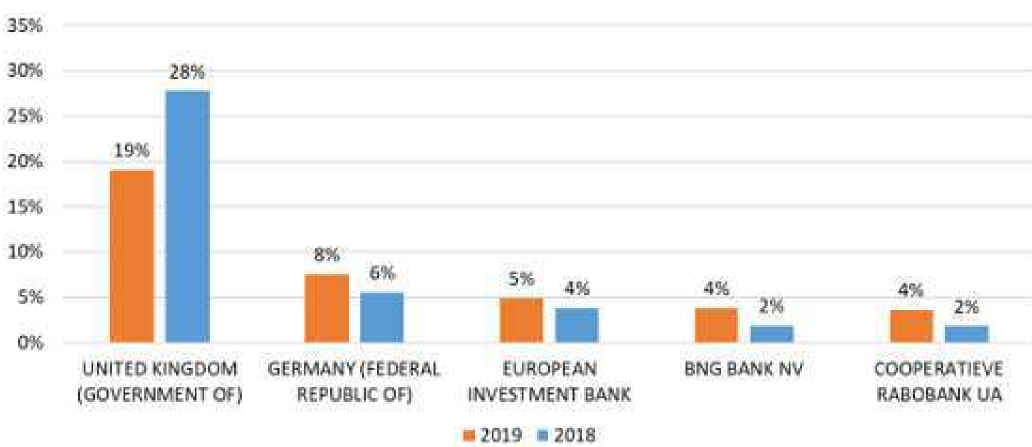


Figure 16: Top 5 Portfolio issuer exposures as at 31 December



Market risk management and mitigation techniques

Calpe maintains a number of risk mitigation techniques and approaches to manage 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; and
    - issuer limitations;
- Investment Committee mandate and oversight;
- stress testing; and
- market risk/value at risk analyses, including extreme market and currency stress tests (+/- 300 basis points (bps) movement).

Stress and sensitivity tests

Calpe performs stress and scenario testing as part of its approach to managing market risk. Results are considered as part of the ORSA process. For the 2019 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 are considered.

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

Processes for monitoring the effectiveness of risk mitigation techniques

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

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

Prudent person principle

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

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

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

Calpe does not use derivative instruments nor hold assets that are not traded on regulated financial markets. 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 Calpe is exposed to a loss if another party fails to perform its financial obligations to Calpe, including the failure to perform them in a timely manner. This includes default by MGAs, brokers, reinsurers, customers, investment counterparties and suppliers. Included within this category is the management of the credit risk associated with the TRL Quota Share described in section B1.

MGAs / brokers / intermediaries / reinsurers

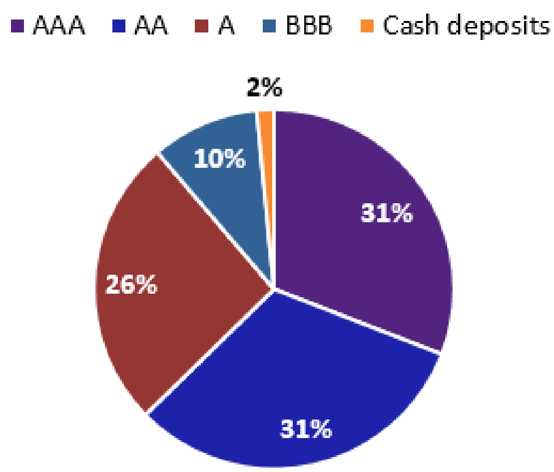
Calpe has credit risk with the co-insurers and MGAs that it generates business through as they represent the major conduit of business to Calpe. All MGAs, co-insurers, brokers, intermediaries and reinsurers are subject to ongoing review by a range of fora, which include the Risk & Audit Committee, the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

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

Investment counterparties

Calpe maintains a well-diversified and highly rated investment portfolio. Calpe maintains all its investments in GBP, with its main investment exposure being to the UK Government. All financial assets supporting the Euro liabilities of the firm are held in cash and cash deposits. The average credit quality of its portfolio is Aa3/AA-.

Figure 17: Portfolio credit quality as at 31 December 2019



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

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

Calpe uses external credit assessments primarily to:

- review the credit quality of assets in its investment portfolios; and
- review the credit quality of its reinsurers.

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

TRL Quota Share

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

Key controls

Key controls to mitigate credit risk include:

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

Risk sensitivity for credit risks

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

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

Processes for monitoring the effectiveness of risk mitigation techniques

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

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

Prudent person principle applied to credit risks

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

C.4 Liquidity risk

Liquidity risk would arise if Calpe 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. Calpe sees liquidity risk as the management of risk arising from short term cash flows, rather than the risk arising from longer-term matching of assets and liabilities. Liquidity risk is considered by Calpe's Investment Committee and Board.

Key controls

Key controls that aid in mitigating this risk include:

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

Risk sensitivity for liquidity risk

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

Process for monitoring the effectiveness of risk mitigation techniques

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

Prudent person principle as applied to liquidity risks

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

Expected profit included in future premiums (“EPIFP”)

EPIFP as at 31 December 2019, gross of reinsurance recoverables, was £2,496k (2018: £1,860k).

C.5 Operational risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. Operational risk is diverse in nature and permeates all business activities but remains a distinct form of risk in its own right. Operational risk within Calpe 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 and the risk that the firm might be used as a vehicle for financial crime;
- cyber threats / data breaches and data privacy – the risks associated with unauthorised access to Calpe’s systems caused by internal and external security breaches;
- financial & accounting – the risks associated with financial reporting and integrity of financial information;
- people risk – the risk that people do not follow Calpe's procedures, practices and/or rules, thus deviating from expected behaviour in a way that could damage Calpe;
- business continuity management – the risks associated with the failure to appropriately manage unforeseen events;
- model risk – the risk that the output from models used by Calpe is incorrect or flawed due to errors in the design or operation or management’s failure to understand the models’ limitations;
- processing failures – including IT system failures and other risks associated with IT systems;
- outsourcing – failures relating to the outsourcing of key activities; and
- external events and other changes – failure to react to changes in the external business environment.

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

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

Calpe maintains an Operational Risk policy that sets out Calpe’s approach to mitigating operational risks.

Key controls

Key mitigating controls include:

- Risk & Audit Committee oversight;
- quarterly reviews by risk owners assessing the effectiveness of mitigating controls;

- policies and procedures, including the Group's Code of Conduct, business continuity plans and succession planning;
- operational risk appetites;
- escalation procedures;
- data quality standards;
- compliance training, procedures; monitoring and oversight;
- personnel training, oversight and appraisals;
- cybersecurity dashboard;
- disaster recovery plan;
- service level agreements;
- anti-bribery and corruption procedures; and
- performance of underwriting audits.

Risk sensitivities for operational risk

Calpe does not have any material exposures to operational risk.

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

For the 2019 ORSA, the current and projected solvency position over the business planning period were re-calculated following adverse operational risk stresses. Under all of these scenarios, the analysis indicated that Calpe was able to withstand these events without breaching its SCR.

Process for monitoring the effectiveness of risk mitigation techniques

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

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

C.6 Other material risks

<u>Franchise value</u>: Calpe 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, Calpe and TransRe will not accept risks, both underwriting and non-underwriting, that may materially impair or impact the reputation of Calpe or TransRe.

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

<u>Brexit</u>: Risks related to Brexit are summarised in section A5.

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

C.7 Any other information

Covid-19

Underwriting Risk: Calpe expects to have minimal direct exposure to Covid-19 risks as our underwriting portfolio is predominately motor risks. Please refer to section A1 for further information.

Market, Counterparty & Liquidity Risk: Given Calpe's high quality investment portfolio with no exposures to equities, Calpe has been largely shielded from the worst effects of recent global stock market large-scale declines. Management continues to monitor the impact of the volatile investment markets and will take proactive steps to ensure Calpe's investment portfolio remains resilient.

Operational Risk: TransRe and Calpe maintain comprehensive and well tested contingency plans which allow us to run the business effectively during times of operational stress including the Covid-19 outbreak. All personnel supporting Calpe are working remotely, and we anticipate that this will continue for some time. In addition, Calpe has contacted its key outsourcers and MGAs to ensure that they have resilient business continuity plans in place to ensure continuity of service to both its customers and brokers.

During this time, regular senior management team meetings are held to ensure business processes continue to operate effectively.

All Calpe personnel have access to TransRe's and Calpe's IT infrastructure remotely. Essential business interactions with policyholders, personnel and business partners continue digitally and all business-critical processes are reviewed regularly to ensure deadlines can be met. Although there will be some operational inconvenience, Calpe remains well positioned to support its stakeholders including its policyholders, personnel and business partners during this stressed time.

Risk sensitivity

Calpe's SCR coverage ratio as at 31 December 2019 is 141% (2018: 138%). The below table shows the change in the SCR coverage ratio under several hypothetical scenarios.

Figure 18: SCR coverage ratio sensitivity analysis

Scenario	% change to SCR coverage ratio
Exchange rates: +10%	-0.1%
Exchange rates: -10%	0.1%
Interest rates: +1%	-6%
Interest rates: -1%	4%
Credit spreads: +1%	-5%
Credit spreads: -1%	5%
Catastrophe loss: £100m gross, £0.1net of all reinsurance	-23%

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

D. Valuation for solvency purposes

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

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

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

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

D.1 Assets

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

Figure 19: Summary assets as at 31 December 2019

(£'000s)	Solvency II	Financial statement assets	Difference
Deferred acquisition costs	0	9,810	(9,810)
Deferred tax assets	268	0	268
Investments			
Government Bonds	21,415	21,287	128
Corporate Bonds	28,947	28,661	286
Collateralised Securities	0	0	0
Interest Receivable	0	414	(414)
Reinsurance recoverables			
Non-life excluding health	137,659	175,450	(37,791)
Life excluding health	327	0	327
Deposits to cedants	0	0	0
Total Receivables			
Insurance and intermediary receivables	6,477	35,635	(29,158)
Reinsurance receivables	2,970	0	2,970
Receivables (trade, not insurance)	0	109	(109)
Cash and cash equivalents	10,668	10,668	(0)
Total assets	**208,731**	**282,034**	**(73,303)**

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

Deferred acquisition costs ("DAC")

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

Deferred tax

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

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

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

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

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

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

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

Investments

Recognition and derecognition of investments

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

Fair value of investments

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

Impairment

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

Valuation differences between the Solvency II and IFRS balance sheets

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

1. Level 1: The use of quoted market prices in active markets for the same assets or liabilities;
2. Level 2: Where the use of quoted market prices in active markets for the same assets or liabilities is not possible, quoted market prices in active markets for similar assets and liabilities are used, with adjustments made to reflect factors specific to the asset or liability. All of Calpe's investment assets were classified as Level 2 as at 31 December 2019; and
3. Level 3: Where the criteria above are not satisfied, alternative valuation methods are used, which make maximum use of relevant market inputs (adjusted for factors specific to the asset or liability under valuation). To the extent that observable inputs are not available, use is made of unobservable inputs

reflecting the assumptions that market participants would use (including assumptions about risk in the valuation technique).

Calpe considers its policy on the fair value of investments to be consistent with the hierarchy of valuation methods required for Solvency II. Accordingly, the valuation policy on fair values is applied consistently between Calpe's Solvency II reporting and its statutory financial reporting. Calpe's investment portfolio as at 31 December 2019 includes only investments that are valued at fair value. There are accordingly no differences in valuation relating to financial investments between Calpe's Solvency II and IFRS balance sheets.

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

Fair value sources and use of pricing vendors

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

Reinsurance recoverables

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

(Re)insurance and intermediaries receivable

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

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

Other receivables (trade not insurance)

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

Cash and cash equivalents

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

Foreign currency transactions and balances

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

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

Translation to functional currency

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

Figure 20: Deferred tax calculation as at 31 December

£'000s	2019	2018
Deferred tax asset per financial statements	**0**	**0**
Adjustment needed (all timing differences are expected to unwind at a tax rate of 10%)		
Deferred acquisition costs (DAC)	196	166
Change in technical provisions ("TPs") (including removal of UPR)	(194)	(145)
Risk margin	261	240
Receivables (trade, not insurance)	5	3
Total Solvency II deferred tax asset	**268**	**264**

D.2 Technical provisions

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

Best estimate liabilities ("BELs") 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 Calpe is obligated to at the valuation date.

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

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

Technical Provisions = Best Estimate Liability + Risk Margin

Calpe does not calculate technical provisions as a whole.

Segmentation into lines of business

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

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

Figure 21: Technical provisions by line of business as at 31 December 2019

Technical provisions bases, methodologies and key assumptions

Solvency II line of business (£'000)	Gross	Reinsurance ceded	Net	Risk Margin	Total TP
Motor vehicle liability insurance	136,079	111,798	24,281	2,111	26,392
Other motor insurance	24,014	19,729	4,285	372	4,657
General liability insurance	7,475	6,132	1,343	117	1,460
Total non-life	**167,568**	**137,659**	**29,909**	**2,600**	**32,509**
Life: annuities	333	327	6	0	6
Total life	**333**	**327**	**6**	**0**	**6**
Total technical provisions	**167,901**	**137,986**	**29,915**	**2,600**	**32,515**

Basis

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

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

Figure 22: IFRS to Solvency II reconciliation for the year ended 31 December 2019

Solvency II Line of Business	Assumed £'000s	Ceded £'000s	Net £'000s
IFRS Technical Provisions	**214,240**	**175,450**	**38,790**
Deferred acquisition costs	(9,719)	(7,775)	(1,944)
Contingent commission costs	(12,518)	(8,234)	(4,284)
Reserving margins	(5,583)	(6,258)	675
Future premiums & acquisition costs	(16,363)	(13,225)	(3,138)
Future other expenses	147	0	147
Legally obliged unincepted business	(315)	(265)	(50)
Discounting	(1,988)	(1,641)	(347)
Counterparty default	0	(66)	66
Solvency II best estimate	**167,901**	**137,986**	**29,915**
Risk margin	2,600	0	2,600
Solvency II technical provisions	**170,501**	**137,985**	**32,515**

Best estimate liability

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

Claims provision

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

- the best estimate of outstanding losses, and any expenses in loss-adjustment (Loss Adjustment Expenses, "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

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

- the best estimate of IBNR claims based on unearned premiums;
- plus the best estimate of unpaid non-contingent acquisition costs that 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; and
- 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 Calpe uses (described above) are employed to estimate ultimate losses, including the delay between the claim being reported to the (co)insurer, and the insurer reporting the claim to Calpe. Expert judgement is employed to select the most appropriate method, particularly when the delays previously identified within the data fluctuate between claims.

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

Methodologies for expired and unexpired periods of coverage

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

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

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

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

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

Future premiums & acquisition costs

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

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

Future other expenses

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

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

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

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

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

Legally obliged unincepted business

At any given time, Calpe may have contracts that have been written but have not yet incepted (i.e. the cover has not yet commenced). For example, a contract that was bound on 28 December 2019 which incepts on 1 January 2020 would be included within legally obliged unincepted business at 31 December 2019.

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

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

Events not in data

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

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

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

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

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

Discounting

Technical provisions are not discounted under IFRS.

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

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

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

Counterparty default

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

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

$$\textit{Probability of default} \quad x \quad \textit{Loss given default}$$

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%. Calpe does not adjust the amounts recoverable to allow for deposits or collateralisation arrangements.

Risk margin

The risk margin is calculated as the present value of future SCRs, multiplied by the prescribed rate for the cost of capital of 6% per annum 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, Calpe reflects the value of reinsurance agreements where risk is ceded to a third party (which includes consideration of the counterparty default calculations above) within the technical provisions. This allows Calpe to denote a technical provision figure net of reinsurance.

Existing reinsurance

Calpe employs both proportional and non-proportional ceded reinsurance.

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

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

Future reinsurance purchases

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

Uncertainty within the technical provisions

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

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

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

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

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

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

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

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

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

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

and man-made catastrophes such as:

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

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

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

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

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

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

Sensitivity analysis for technical provisions

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

Figure 23: Technical provision sensitivities

	Exchange Rates		Interest Rates		Reserving Assumptions*
Key assumptions	10%	-10%	1%	-1%	5%
Technical provisions	1%	-1%	-2%	1%	6%

* This sensitivity includes a 5% uplift to the gross ULR assumptions on the 2018/19 UY contracts and allows for reinsurance recoveries and the impact on sliding scale commissions.

Exclusions from technical provisions

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

Matching adjustment

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

Volatility adjustment

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

Transitional measures to technical provisions (TMTP)

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

Transitional risk-free interest rate-term structure

Calpe 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 Calpe's Solvency II balance sheet, their Solvency II values and corresponding values shown in the Financial Statements are summarised in the table below.

Figure 24: Other liabilities – IFRS & Solvency II reconciliation

£'000s	Solvency II	Financial statement liabilities	Difference
Insurance and intermediary payables	1,397	1,392	5
Reinsurance payables	2,943	22,193	(19,250)
Payables (trade, not insurance)	583	644	(61)
Deferred acquisition cost	0	7,848	(7,848)
Total other liabilities	**4,923**	**32,077**	**(27,154)**
Total technical provisions	170,501	214,240	(43,739)
Total liabilities	**175,424**	**246,317**	**(70,893)**

The main valuation differences between Solvency II and financial statement balances presented in figure 24 are as follows:

- IFRS reinsurance payables include technical accruals which for Solvency II are subsumed within technical provisions;
- IFRS trade payables include accrued "other expenses" but for Solvency II, accrued "other expenses" are subsumed within technical provisions; and
- technical provisions differences arise due to the differing treatments of technical accruals and accrued other expenses referred to above.

Calpe has no finance or operating lease arrangements.

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

(Re)insurance and intermediaries payable

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

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

Provisions

Other than technical provisions, Calpe held no provisions in its financial statements or on its Solvency II balance sheet as at 31 December 2019.

Contingent liabilities

Calpe does not consider any contingent liabilities exist as at 31 December 2019.

Employee benefits

Calpe does not consider any employee benefit liabilities exist as at 31 December 2019.

Aggregation of liabilities

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

D.4 Alternative methods for valuation

Calpe does not use any alternative methods for valuation.

D.5 Any other information

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

E. Capital management

E.1 Own funds

As at 31 December 2019 Calpe's own funds to cover its SCR were £33,307k (2018: £31,547k), representing an increase of £1,760k.

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

In addition, Calpe recognises a reconciliation reserve of £3,039k, which is classified as Tier 1 own funds and a deferred tax asset of £268k, 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.

Figure 25: Eligible own funds by tier

Tier	Instruments	At 31 December (£'000s)	
		2019	2018
Tier 1	Ordinary paid up share capital	30	30
	Share premium related to ordinary share capital	29,970	29,970
	Reconciliation reserve	3,039	1,283
Tier 2	N/A		
Total own funds to cover MCR		**33,039**	**31,283**
Tier 3	Net deferred tax asset	268	264
Total own funds to cover SCR		**33,307**	**31,547**

As at 31 December 2019, Calpe had no ancillary own funds.

The reconciliation reserve of £3,039k is calculated below and is dependent on the level of excess assets over liabilities, the values of ordinary share capital and deferred tax assets. The reconciliation reserve is not considered to be significantly volatile; however, the potential for volatility does exist and is discussed in the sensitivity analyses provided in sections C7 and D2 of this report.

Figure 26: Reconciliation Reserve

Reconciliation Reserve	At 31 December (£'000s)	
	2019	2018
Excess of assets over liabilities	**33,307**	**31,546**
Less:		
Ordinary share capital	(30,000)	(30,000)
Deferred tax asset	(268)	(264)
Reconciliation reserve	**3,039**	**1,282**

Every quarter Calpe reviews its own funds against the MCR and SCR requirements. The review is undertaken by the Risk Management function and is presented to the Risk & Audit Committee as part of the ongoing review process. Included in the analysis is a forward-looking review that takes into consideration Calpe's three year planning horizon. There have been no material changes to own funds during the year.

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

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

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

	2019 (£'000s)	
IFRS net assets	**35,716**	
Change in:		
Net DAC	(1,962)	Valued at nil under Solvency II
Reinsurance receivables	(26,188)	Estimated premium and Contingent Commission Reserve not yet due moved to TPs
Reinsurance recoverables	(37,464)	Adjustment from reinsurer's share of IFRS insurance reserves to Solvency II TPs
Other receivables	(109)	Prepaid insurance related expenses not yet due moved to TP's
(Re)insurance payables	19,245	Accrued premium and Contingent Commission Reserve not yet due moved to TPs
Other payables	61	Accrued insurance related expenses not yet due moved to TPs
Technical provisions	46,340	Adjustment from IFRS insurance reserves to Solvency II TPs
Risk margin	(2,600)	Inclusion of Solvency II Risk Margin
Deferred tax asset	268	Pre-tax change in Net Assets x 10% deferred tax rate
Solvency II Net Assets	**33,307**	

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

Please see section D1 for further information on the valuation of assets under Solvency II; section D2 for a reconciliation between the IFRS and Solvency II technical provisions; and section D3 for other liabilities.

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

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

E.2 SCR and MCR

Calpe uses the Solvency II Standard Formula to calculate its SCR.

Figure 28: Solvency II capital requirements at 31 December 2019

	2019 (£'000)	2018 (£'000)
Eligible Own Funds to cover SCR	33,307	31,546
Eligible Own Funds to cover MCR	33,039	31,283
Minimum Capital Requirement	5,886	5,713
Basic Solvency Capital Requirement	18,517	18,380
Operational risk	5,029	4,474
Solvency Capital Requirement	**23,546**	**22,854**
Market risk	2,585	3,234
Counterparty default risk	6,896	5,793
Life underwriting risk	0	6
Health underwriting risk	0	0
Non-life underwriting risk	13,125	13,561
less Diversification	(4,089)	(4,215)
Basic Solvency Capital Requirement	**18,517**	**18,379**
Non-life catastrophe risk	838	647
Non-life premium & reserve risk	12,889	13,384
Non-life lapse risk	189	146
less Diversification	(791)	(616)
Non-life underwriting risk	**13,125**	**13,561**

Calpe's SCR ratio as at 31 December 2019 was 141%. This compares to the SCR ratio as at 31 December 2018 of 138%. Calpe's MCR ratio also increased from 548% in 2018 to 561% as at 31 December 2019. The changes in the SCR and MCR were largely due to the change in the charge for operational risk, which increased proportionately with the best estimate of gross technical provisions.

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

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

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

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

Calculation of the MCR

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

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

Calpe’s linear MCR falls below the SCR corridor of between 25% and 45% of the SCR. Accordingly Calpe’s MCR has been set to equal 25% of its SCR, as required by Solvency II. There have been no changes to Calpe’s business or operations, which would have resulted in a material change to the MCR or SCR calculation.

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

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

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

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

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

There have been no instances of non-compliance with the MCR and SCR by Calpe during 2019.

E.6 Any other information

Calpe does not consider there to be any other material information to disclose regarding capital management.

Appendix 1: Abbreviations used in this report

A.M. Best	A.M. Best Company, Inc. and/or its affiliates
Alleghany	Alleghany Corporation
Artex	Artex Risk Solutions (Gibraltar) Limited
BCP	Business Continuity Planning
BEL	Best Estimate Liabilities
BF	Bornhuetter-Ferguson
BlackRock	BlackRock, Inc and BlackRock Investment Management (UK) Limited
bps	Basis points (0.01%)
Calpe	Calpe Insurance Company Limited
CCD	Corporate Compliance Department
CFO	Chief Financial Officer
Covid-19	2019 Novel Coronavirus
CPD	Continuing Professional Development
CRC	Counterparty & Retrocession Risk Committee
CRMC	Corporate Risk Management Committee
CRO	Chief Risk Officer
DAC	Deferred Acquisition Costs
EIOPA	European Insurance and Occupational Pensions Authority
ELR	Expected Loss Ratio
ENIDs	Events not in Data
EPIFP	Expected Profit included in Future Premiums
ERM	Enterprise Risk Management
EU	European Union
Fitch	Fitch Ratings, Inc., Fitch Ratings, Ltd. and its subsidiaries
GBP	Great Britain Pound Sterling
GFSC	Gibraltar Financial Services Commission
GRM	Global Risk Management
GWP	Gross Written Premium
HR	Human Resources
IBNER	Incurred but not Enough Reported
IBNR	Incurred but not Reported
IFRS	International Financial Reporting Standards
iNED	Independent Non-executive Director
ICE	ICE Services
IT	Information Technology
KYC	Know Your Counterparty
LAE	Loss Adjustment Expenses
LDF	Loss Development Factors
LOUB	Legally Obliged Unincepted Business
LRC	Local Risk Committee
LTF	Loss Trend Factors
MCR	Minimum Capital Requirement
Moody's	Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their affiliates
NEAM	New England Asset Management

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

Appendix 2: Public Quantitative Reporting Templates (QRT)

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

S.02.01.02

Balance sheet

		Solvency II value
	Assets	C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	268
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)	50,362
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*	50,362
R0140	*Government Bonds*	21,415
R0150	*Corporate Bonds*	28,947
R0160	*Structured notes*	0
R0170	*Collateralised securities*	0
R0180	*Collective Investments Undertakings*	0
R0190	*Derivatives*	0
R0200	*Deposits other than cash equivalents*	0
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	0
R0240	*Loans on policies*	0
R0250	*Loans and mortgages to individuals*	0
R0260	*Other loans and mortgages*	0
R0270	Reinsurance recoverables from:	137,986
R0280	*Non-life and health similar to non-life*	137,659
R0290	*Non-life excluding health*	137,659
R0300	*Health similar to non-life*	0
R0310	*Life and health similar to life, excluding index-linked and unit-linked*	327
R0320	*Health similar to life*	0
R0330	*Life excluding health and index-linked and unit-linked*	327
R0340	*Life index-linked and unit-linked*	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	6,477
R0370	Reinsurance receivables	2,970
R0380	Receivables (trade, not insurance)	0
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	10,668
R0420	Any other assets, not elsewhere shown	0
R0500	**Total assets**	208,731

S.02.01.02

Balance sheet

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions - non-life	170,168
R0520	*Technical provisions - non-life (excluding health)*	170,168
R0530	*TP calculated as a whole*	0
R0540	*Best Estimate*	167,568
R0550	*Risk margin*	2,600
R0560	*Technical provisions - health (similar to non-life)*	0
R0570	*TP calculated as a whole*	0
R0580	*Best Estimate*	0
R0590	*Risk margin*	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	333
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)*	333
R0660	*TP calculated as a whole*	0
R0670	*Best Estimate*	333
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	0
R0830	Reinsurance payables	1,397
R0840	Payables (trade, not insurance)	2,943
R0850	Subordinated liabilities	583
R0860	*Subordinated liabilities not in BOF*	0
R0870	*Subordinated liabilities in BOF*	0
R0880	Any other liabilities, not elsewhere shown	0
R0900	**Total liabilities**	175,424
R1000	**Excess of assets over liabilities**	33,307

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	71,353	12,592	0	0	12,329	0	0	0	0					96,274
R0120	Gross - Proportional reinsurance accepted	0	0	0	3,227	569	0	0	0	0	0	0	0					3,796
R0130	Gross - Non-proportional reinsurance accepted				0	0			0					0	0	0	0	0
R0140	Reinsurers' share	0	0	0	61,624	10,875	0	0	10,144	0	0	0	0	0	0	0	0	82,643
R0200	Net	0	0	0	12,956	2,286	0	0	2,185	0	0	0	0	0	0	0	0	17,427
	Premiums earned																	
R0210	Gross - Direct Business	0	0	0	69,573	12,277	0	0	9,765	0	0	0	0					91,615
R0220	Gross - Proportional reinsurance accepted	0	0	0	1,210	214	0	0	0	0	0	0	0					1,424
R0230	Gross - Non-proportional reinsurance accepted				0	0			0					0	0	0	0	0
R0240	Reinsurers' share	0	0	0	58,450	10,315	0	0	8,036	0	0	0	0	0	0	0	0	76,801
R0300	Net	0	0	0	12,333	2,176	0	0	1,729	0	0	0	0	0	0	0	0	16,238
	Claims incurred																	
R0310	Gross - Direct Business	0	0	0	57,877	10,214	0	0	5,643	0	0	0	0					73,734
R0320	Gross - Proportional reinsurance accepted	0	0	0	783	138	0	0	0	0	0	0	0					921
R0330	Gross - Non-proportional reinsurance accepted				0	0			0					0	0	0	0	0
R0340	Reinsurers' share	0	0	0	48,871	8,625	0	0	4,687	0	0	0	0	0	0	0	0	62,183
R0400	Net	0	0	0	9,789	1,727	0	0	956	0	0	0	0	0	0	0	0	12,472
	Changes in other technical provisions																	
R0410	Gross - Direct Business																	0
R0420	Gross - Proportional reinsurance accepted																	0
R0430	Gross - Non-proportional reinsurance accepted																	0
R0440	Reinsurers' share																	0
R0500	Net	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
R0550	**Expenses incurred**	0	0	0	2,275	401	0	0	696	0	0	0	0	0	0	0	0	3,372
R1200	**Other expenses**																	
R1300	**Total expenses**																	3,372

S.05.01.02

Premiums, claims and expenses by line of business

Life

		Line of Business for: life insurance obligations	
		Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Total
		C0260	C0300
	Premiums written		
R1410	Gross	0	0
R1420	Reinsurers' share	0	0
R1500	Net	0	0
	Premiums earned		
R1510	Gross	0	0
R1520	Reinsurers' share	0	0
R1600	Net	0	0
	Claims incurred		
R1610	Gross	-12	-12
R1620	Reinsurers' share	-6	-6
R1700	Net	-6	-6
	Changes in other technical provisions		
R1710	Gross	0	0
R1720	Reinsurers' share	0	0
R1800	Net	0	0
R1900	**Expenses incurred**	0	0
	Other expenses		
	Total expenses		0

S.05.02.01

Premiums, claims and expenses by country

Non-life

		C0010	C0020	C0030	C0040	C0050	C0060	C0070
		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations			Top 5 countries (by amount of gross premiums written) - non-life obligations		Total Top 5 and home country
R0010			GB	IE				
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
	Premiums written							
R0110	Gross - Direct Business	0	87,227	9,047	0	0	0	96,274
R0120	Gross - Proportional reinsurance accepted	0	0	3,796	0	0	0	3,796
R0130	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0140	Reinsurers' share	0	72,275	10,368	0	0	0	82,643
R0200	Net	0	14,952	2,475	0	0	0	17,427
	Premiums earned							
R0210	Gross - Direct Business	0	81,955	9,660	0	0	0	91,615
R0220	Gross - Proportional reinsurance accepted	0	0	1,424	0	0	0	1,424
R0230	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0240	Reinsurers' share	0	67,820	8,981	0	0	0	76,801
R0300	Net	0	14,135	2,103	0	0	0	16,238
	Claims incurred							
R0310	Gross - Direct Business	0	66,865	6,869	0	0	0	73,734
R0320	Gross - Proportional reinsurance accepted	0	0	921	0	0	0	921
R0330	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0340	Reinsurers' share	0	55,737	6,446	0	0	0	62,183
R0400	Net	0	11,128	1,344	0	0	0	12,472
	Changes in other technical provisions							
R0410	Gross - Direct Business	0	0	0	0	0	0	0
R0420	Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0
R0430	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0440	Reinsurers' share	0	0	0	0	0	0	0
R0500	Net	0	0	0	0	0	0	0
R0550	**Expenses incurred**	0	2,518	854	0	0	0	3,372
R1200	**Other expenses**							0
R1300	**Total expenses**							3,372

S.05.02.01

Premiums, claims and expenses by country

Life

		C0150	C0160	C0170	C0180	C0190	C0200	C0210
		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
R1400			GB					
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
	Premiums written							
R1410	Gross							
R1420	Reinsurers' share							
R1500	Net							
	Premiums earned							
R1510	Gross							
R1520	Reinsurers' share							
R1600	Net							
	Claims incurred							
R1610	Gross		-12					-12
R1620	Reinsurers' share		-6					-6
R1700	Net		-6					-6
	Changes in other technical provisions							
R1710	Gross							
R1720	Reinsurers' share							
R1800	Net							
R1900	**Expenses incurred**							
R2500	**Other expenses**							
R2600	**Total expenses**							

S.12.01.02

Life and Health SLT Technical Provisions

			Index-linked and unit-linked insurance		Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, including Unit-Linked)	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
		Insurance with profit participation		Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees					Contracts without options and guarantees	Contracts with options or guarantees			
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
R0010	**Technical provisions calculated as a whole**									0	0						0
R0020	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole									0	0						0
	Technical provisions calculated as a sum of BE and RM																
	Best estimate																
R0030	**Gross Best Estimate**								333	0	333						0
R0080	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default								327	0	327						0
R0090	Best estimate minus recoverables from reinsurance/SPV and Finite Re	0		0	0		0	0	6	0	6		0	0	0	0	0
R0100	**Risk margin**								0	0	0						0
	Amount of the transitional on Technical Provisions																
R0110	Technical Provisions calculated as a whole										0						0
R0120	Best estimate										0						0
R0130	Risk margin										0						0
R0200	**Technical provisions - total**	0	0			0			333	0	333	0			0	0	0

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	0	0	14,815	2,615	0	0	1,216	0	0	0	0	0	0	0	0	18,646
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	0	0	16,399	2,894	0	0	1,165	0	0	0	0	0	0	0	0	20,458
R0150	**Net Best Estimate of Premium Provisions**	0	0	0	-1,584	-279	0	0	51	0	0	0	0	0	0	0	0	-1,812
	Claims provisions																	
R0160	Gross	0	0	0	121,264	21,399	0	0	6,259	0	0	0	0	0	0	0	0	148,922
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	0	0	95,399	16,835	0	0	4,967	0	0	0	0	0	0	0	0	117,201
R0250	**Net Best Estimate of Claims Provisions**	0	0	0	25,865	4,564	0	0	1,292	0	0	0	0	0	0	0	0	31,721
R0260	**Total best estimate - gross**	0	0	0	136,079	24,014	0	0	7,475	0	0	0	0	0	0	0	0	167,568
R0270	**Total best estimate - net**	0	0	0	24,281	4,285	0	0	1,343	0	0	0	0	0	0	0	0	29,909
R0280	**Risk margin**	0	0	0	2,111	372	0	0	117	0	0	0	0	0	0	0	0	2,600
	Amount of the transitional on Technical Provisions																	
R0290	Technical Provisions calculated as a whole																	0
R0300	Best estimate																	0
R0310	Risk margin																	0
R0320	**Technical provisions - total**	0	0	0	138,190	24,386	0	0	7,592	0	0	0	0	0	0	0	0	170,168
R0330	**Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total**	0	0	0	111,798	19,729	0	0	6,132	0	0	0	0	0	0	0	0	137,659
R0340	**Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total**	0	0	0	26,392	4,657	0	0	1,460	0	0	0	0	0	0	0	0	32,509

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
R0160	2010	0	0	0	0	0	0	0	0	0	0		0	0
R0170	2011	292	4,441	4,664	2,141	1,268	539	261	1,100	148			148	14,853
R0180	2012	1,491	6,416	3,286	1,550	973	908	1,116	77				77	15,816
R0190	2013	1,450	6,877	6,381	2,533	1,770	1,335	2,030					2,030	22,375
R0200	2014	5,579	17,734	9,994	10,685	5,415	5,343						5,343	54,751
R0210	2015	7,757	17,816	9,965	4,958	4,706							4,706	45,202
R0220	2016	4,524	23,507	14,746	6,649								6,649	49,426
R0230	2017	2,968	21,501	12,059									12,059	36,528
R0240	2018	3,095	18,619										18,619	21,714
R0250	2019	3,125											3,125	3,125
R0260												Total	52,756	263,790

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	2010	0	0	0	0	0	0	0	0	0	0		0
R0170	2011	1,086	5,790	6,394	3,714	2,089	1,998	2,473	2,204	1,822			1,817
R0180	2012	4,399	9,067	5,384	3,335	2,161	1,114	438	715				712
R0190	2013	7,768	12,902	10,514	7,222	3,455	2,599	630					625
R0200	2014	11,730	21,954	29,237	22,397	15,729	11,104						11,011
R0210	2015	14,546	34,062	25,839	20,959	14,714							14,575
R0220	2016	23,104	46,977	38,542	31,423								31,056
R0230	2017	20,785	38,821	37,332									36,970
R0240	2018	15,498	40,982										40,539
R0250	2019	31,033											30,578
R0260												Total	167,883

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)	30	30	0	0	0
R0030	Share premium account related to ordinary share capital	29,970	29,970	0	0	0
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0	0	0	0
R0050	Subordinated mutual member accounts	0	0	0	0	0
R0070	Surplus funds	0	0	0	0	0
R0090	Preference shares	0	0	0	0	0
R0110	Share premium account related to preference shares	0	0	0	0	0
R0130	Reconciliation reserve	3,039	3,039	0	0	0
R0140	Subordinated liabilities	0	0	0	0	0
R0160	An amount equal to the value of net deferred tax assets	268	0	0	0	268
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**	33,307	33,039	0	0	268
	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	33,307	33,039	0	0	268
R0510	Total available own funds to meet the MCR	33,039	33,039	0	0	0
R0540	Total eligible own funds to meet the SCR	33,307	33,039	0	0	268
R0550	Total eligible own funds to meet the MCR	33,039	33,039	0	0	0
R0580	**SCR**	23,546				
R0600	**MCR**	5,886				
R0620	**Ratio of Eligible own funds to SCR**	141%				
R0640	**Ratio of Eligible own funds to MCR**	561%				

	Reconcilliation reserve	C0060
R0700	Excess of assets over liabilities	33,307
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	0
R0730	Other basic own fund items	30,268
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0760	**Reconciliation reserve**	3,039
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	0
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	2,496
R0790	**Total Expected profits included in future premiums (EPIFP)**	2,496

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0040	C0080	C0090
R0010	Market risk	2,585		
R0020	Counterparty default risk	6,896		
R0030	Life underwriting risk	0		
R0040	Health underwriting risk	0		
R0050	Non-life underwriting risk	13,125		
R0060	Diversification	-4,089		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	18,517		

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	5,029
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	0
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency Capital Requirement excluding capital add-on**	23,546
R0210	Capital add-ons already set	0
R0220	**Solvency capital requirement**	23,546
	Other information on SCR	
R0400	Capital requirement for duration-based equity risk sub-module	0
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	0
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0

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	4,943

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
R0020	Medical expense insurance and proportional reinsurance	0	0
R0030	Income protection insurance and proportional reinsurance	0	0
R0040	Workers' compensation insurance and proportional reinsurance	0	0
R0050	Motor vehicle liability insurance and proportional reinsurance	24,282	18,126
R0060	Other motor insurance and proportional reinsurance	4,285	3,199
R0070	Marine, aviation and transport insurance and proportional reinsurance	0	0
R0080	Fire and other damage to property insurance and proportional reinsurance	0	0
R0090	General liability insurance and proportional reinsurance	1,342	3,628
R0100	Credit and suretyship insurance and proportional reinsurance	0	0
R0110	Legal expenses insurance and proportional reinsurance	0	0
R0120	Assistance and proportional reinsurance	0	0
R0130	Miscellaneous financial loss insurance and proportional reinsurance	0	0
R0140	Non-proportional health reinsurance	0	0
R0150	Non-proportional casualty reinsurance	0	0
R0160	Non-proportional marine, aviation and transport reinsurance	0	0
R0170	Non-proportional property reinsurance	0	0

	Linear formula component for life insurance and reinsurance obligations	C0040
R0200	MCR_L Result	0

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits	0	
R0220	Obligations with profit participation - future discretionary benefits	0	
R0230	Index-linked and unit-linked insurance obligations	0	
R0240	Other life (re)insurance and health (re)insurance obligations	5	
R0250	Total capital at risk for all life (re)insurance obligations		0

	Overall MCR calculation	C0070
R0300	Linear MCR	4,943
R0310	SCR	23,546
R0320	MCR cap	10,596
R0330	MCR floor	5,886
R0340	Combined MCR	5,886
R0350	Absolute floor of the MCR	3,187
R0400	**Minimum Capital Requirement**	5,886