

TransRe Europe S.A.

Solvency and Financial Condition Report

As at 31 December 2024



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About this document

This document is the Solvency and Financial Condition Report ("SFCR") for TransRe Europe S.A. ("TRE" or "the Company") as at 31 December 2024.

This SFCR covers TRE on a solo basis. TRE's reporting and presentational currency is US dollars ("US\$").

Directors' statement

We acknowledge our responsibility for preparing the SFCR in all material respects in accordance with the Commissariat aux Assurances ("CAA") Rules and the Solvency II Regulations (Solvency and Financial Condition Report under Articles 51 et seq. of the SII Directive 2009/138 / EC in conjunction with Articles 290 et seq. of Delegated Regulation (EU) 2015/35 of the Commission of 10 October 2014 and Articles 82 et seq. of the local Law of 7 December 2015 on the insurance sector).

Unless otherwise mentioned in the report, the information contained herein is based on facts and knowledge as at the reference date of the report.

We are satisfied that:

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

On behalf of the Board of Directors

A stylized, handwritten signature in black ink, consisting of several fluid, connected strokes.

Peter Clements
Dirigeant Agréé

8 April 2025



Executive summary

TRE is a wholly owned subsidiary of Transatlantic Reinsurance Company ("TRC") and provides the TransRe group ("TransRe") with its main platform to write business in Continental Europe and in the Middle East and North Africa region ("MENA"). TRC is incorporated in New York, USA. TRE's ultimate parent undertaking is Berkshire Hathaway Inc. ("Berkshire Hathaway"), a company incorporated in Delaware, USA and headquartered in Omaha, Nebraska, USA.

TRE commenced trading under the name of Guardian Reinsurance Company in January 1977 before being acquired by TRC in 1996. As of 1st July 2019, TRE redomiciled from Zurich to Luxembourg and is regulated by the CAA. TRE has authorisation to transact all types of reinsurance business and operates through its branch offices in Germany, France and Switzerland. In addition to paid up capital of US\$ 27 million, share premium of US\$ 133 million and reconciliation reserve of US\$ 188 million, TRE has the benefit of internal retrocession with TRC and a parental capital support guarantee agreement ("TRC Capital Support Agreement").

TRE has been granted the same financial strength ratings as TRC by both Standard & Poor's ("S&P") and AM Best, being AA+ and A++ (Superior) respectively.

TRE is a specialist non-life and life reinsurance company concentrating on providing reinsurance protection for insurance companies not competing with cedants in their own direct markets. Many of TRE's senior management and underwriting teams have long tenure with TransRe and place great value on enduring client relationships.

TRE continues to enhance its analytical, underwriting and actuarial resources to further concentrate on providing clients with top quality service, expertise and financial security in challenging market conditions.

TRE's focus remains on underwriting excellence and ensuring that opportunities are maximised whilst the market remains largely positive, enhancing client relationships and navigating emerging risks and the ever-changing geopolitical environment.

Business and performance

TRE's strategy is to concentrate foremost on achieving underwriting profitability, not top line growth, and to return excess capital and underwriting profit to the group at the appropriate time to support the wider investment objectives of Berkshire Hathaway. The strategy continues to be aligned with the TransRe group vision of being the first-choice provider of reinsurance.

TRE accesses business through both broker and direct distribution channels and writes a diverse portfolio of treaty and facultative reinsurance, avoiding over-dependence on any one class. We adopt a lead approach to our business, combining technical analysis with underwriting expertise and strong cycle management. In recent years TRE has reduced the amount of external reinsurance cover it buys locally in line with the broader Berkshire Hathaway strategy of managing exposures within the group. However, it continues to purchase some key strategic covers to manage volatility within its Solvency Capital Requirement ("SCR").

Our business strategy during 2024 highlighted the continuing need to focus on underwriting returns. We sought to de-risk those areas seen as dilutive and continued to build our portfolio around those lines of business that were responding more robustly to the ever changing macro-economic and emerging insurance exposure environment.

Overall, the net claim ratio increased from 49.4% in 2023 to 67.5% in 2024, based on net earned premiums of US\$ 73,139k (2023: US\$ 91,711k). After deducting acquisition and operating expenses of US\$ 19,616k (2023: US\$ 22,009k), TRE returned a net underwriting profit of US\$ 4,159k (2023: 24,369k).

The 2024 claims ratio was affected by various catastrophe events (e.g., Persian Gulf floods, Rhada and Storm Boris), fire losses, riots in New Caledonia and reserve increase on casualty treaties, off-set by positive loss reserve development and a focus on underwriting discipline over recent years.

During 2024, yields on one year US Treasury notes, for instance, averaging at 5% for the year, yields on ECB rates averaging at 3.75%. With a portfolio largely invested in short-term fixed income securities, TRE benefited from attractive yields delivered a secure combined investment return of US\$ 24.9 million in 2024



(2023: US\$ 14.3 million). With a much shortened duration profile, the portfolio's sensitivity to future interest rate movements has reduced substantially.

System of governance

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

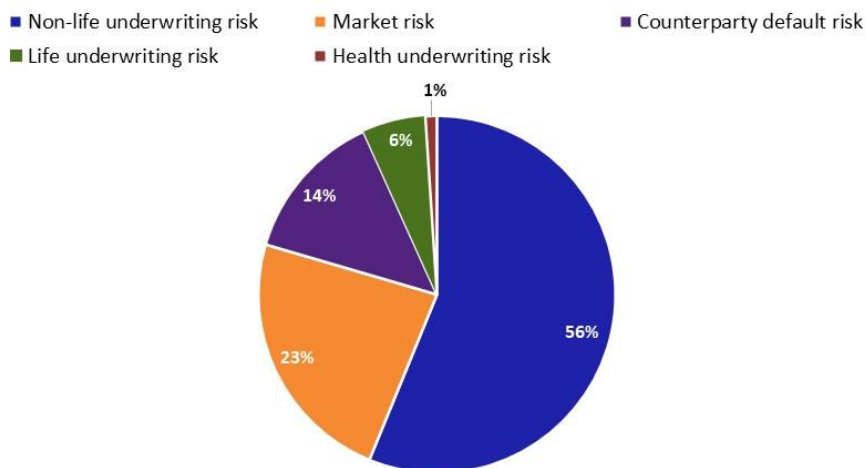
The Board maintains ultimate responsibility for the oversight of TRE and delegates authority for day-to-day management of the business to certain functions and committees. The Board and the committees operate under the guidance of formal terms of reference, which are agreed by the Board.

The members of the Board possess the skills, knowledge and experience required to undertake their roles and responsibilities for overseeing TRE.

Risk profile

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

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



Non-life underwriting risk, encompassing non-life premium and reserve risk, makes up the largest portion of the SCR risk profile.

To help mitigate underwriting risks, TRE maintains a disciplined underwriting philosophy that is supported by risk appetites reflecting TRE's portfolio and risk management tolerances.

TRE continues to benefit from a whole account quota share treaty and an excess of loss whole account retrocession agreement with its parent, TRC, as well as certain retrocession covers that provide protection for TransRe globally as well as TRE specifically.

TRE undertakes detailed stress and scenario testing on an annual or ad-hoc basis. Scenario tests are used to test the company's resilience against shocks from both its underwriting and non-underwriting activities. The results of the analysis show that TRE is strongly capitalised and it would require an extreme event to breach its SCR. TRE's underwriting risk profile is therefore resilient to severe shocks and is within the



Board's approved risk appetite. For additional information on the SCR sensitivity to different risks, please refer to section C.7.

Mindful of the impact of potential spikes in economic inflation, we continue to closely review pricing and reserving trends.

Valuation for Solvency II purposes

Assets and liabilities, including technical provisions, are valued in TRE's regulatory balance sheet according to Solvency II rules and related guidance, giving valuations which differ from those in the financial statements, under Generally Accepted Accounting Principles in Luxembourg ("Lux GAAP").

As at 31 December 2024, TRE's excess of assets over liabilities under Solvency II rules was US\$ 349.4 million (2023: US\$ 350.9 million) compared to US\$ 366.0 million (2023: US\$ 362.4 million) reported in the financial statements under Lux GAAP.

Section D provides a description of the methods, bases and assumptions employed in valuing assets and liabilities in the regulatory balance sheet, together with an analysis of material differences between Lux GAAP and Solvency II valuation bases.

Capital management

Under Solvency II, the own funds of an insurance entity are placed into Tiers 1, 2 or 3 based on their ability to absorb losses, Tier 1 being the most able to do so. Below is a summary of the own funds held by TRE and a comparison to TRE's regulatory capital requirements (the amount of capital the firm is required to hold).

Figure 2: Own funds by tier and capital requirements

Tier	Instruments	At 31 December (US\$'000s)	
		2024	2023
Tier 1	Ordinary share capital	27,000	27,000
	Share premium account	132,959	132,959
	Reconciliation reserve	188,441	185,102
Tier 2	Not applicable	-	-
Total own funds to cover Minimum Capital Requirement ("MCR")		348,401	345,061
Tier 3	Deferred tax assets	-	4,257
Total own funds to cover Solvency Capital Requirement ("SCR")		348,401	349,319
MCR		41,543	42,077
SCR		159,211	155,666
MCR coverage ratio		839%	820%
SCR coverage ratio		219%	224%

Overall TRE held eligible own funds of 219% (2023: 224%) of its SCR and 839% (2023: 820%) of its MCR at 31 December 2024.

The SCR increased by US\$ 3.5 million from US\$ 155.7 million as at 31 December 2023 to US\$ 159.2 million at 31 December 2024; and the eligible own funds to cover its SCR decreased by US\$ -0.9 million from US\$ 349.3 million to US\$ 348.4 million during the same period.

The decrease in the SCR coverage ratio is driven by:

- Own funds to cover the SCR reduced due to the payment of a dividend during 2024 that was mostly off-set by the financial result for the reporting period; and
- SCR increased mainly driven by the market (adjusted calculation of equity risk charge and higher exposure) and operational risk components.

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

TRE's SCR ratio is reviewed regularly to ensure TRE maintains regulatory capital consistent with its stated capital appetite.



A. Business and Performance

A.1 Business

Company information

TransRe Europe S.A.:

1, avenue du Bois
L-1251 Luxembourg

Company Number: B235795

Legal Entity Identifier: 213800QMSSWIO7459N54

Branch offices

TransRe Europe S.A., Luxembourg, Zurich Branch
Sihlstrasse 38, 8001 Zurich (Switzerland)
Company Number: CHE-282.098.466

TransRe Europe S.A., Munich Branch
Promenadeplatz 8, 80333 Munich (Germany)
Company Number: HRB 253912

TransRe Europe S.A., Paris Branch
52 rue de la Victoire, 75009 Paris (France)
Company Number: 879 465 193 R.C.S. Paris

External auditors:

Deloitte Audit, Société à responsabilité limitée
20 Boulevard de Kockelscheuer, L-1821 Luxembourg

Regulator:

Commissariat aux Assurances
11, rue Robert Stumper, L-2557 Luxembourg

TRE is a Société Anonyme under the Luxembourg law, limited by shares, with its registered office in Luxembourg. It is a wholly owned subsidiary of TRC, which is a reinsurance company incorporated and authorised in New York, USA. TRE provides the TransRe group with its main platform to write business in Continental Europe and the MENA region.

TRE has been headquartered in Luxembourg since 1 July 2019. TRE commenced underwriting risks under the name of Guardian Reinsurance Company effective from 1 January 1977 and was acquired by TRC in 1996 and renamed to TransRe Zurich Ltd. Upon re-domiciliation to Luxembourg the Company was renamed to TransRe Europe S.A.

TRE operates through branch offices in Zurich, Munich and Paris.

TRE's ultimate parent undertaking and controlling party is Berkshire Hathaway Inc., a company incorporated in Delaware, USA and headquartered in Omaha, Nebraska, USA. Berkshire Hathaway is listed on the New York Stock Exchange. Further information on Berkshire Hathaway is available at www.berkshirehathaway.com.

In addition to TRC and Berkshire Hathaway, Transatlantic Holdings, Inc. ("TRH"), incorporated in Delaware, USA and Alleghany Corporation ("Alleghany"), also incorporated in Delaware USA and TRH's immediate parent, are indirect parents and controllers of TRE.

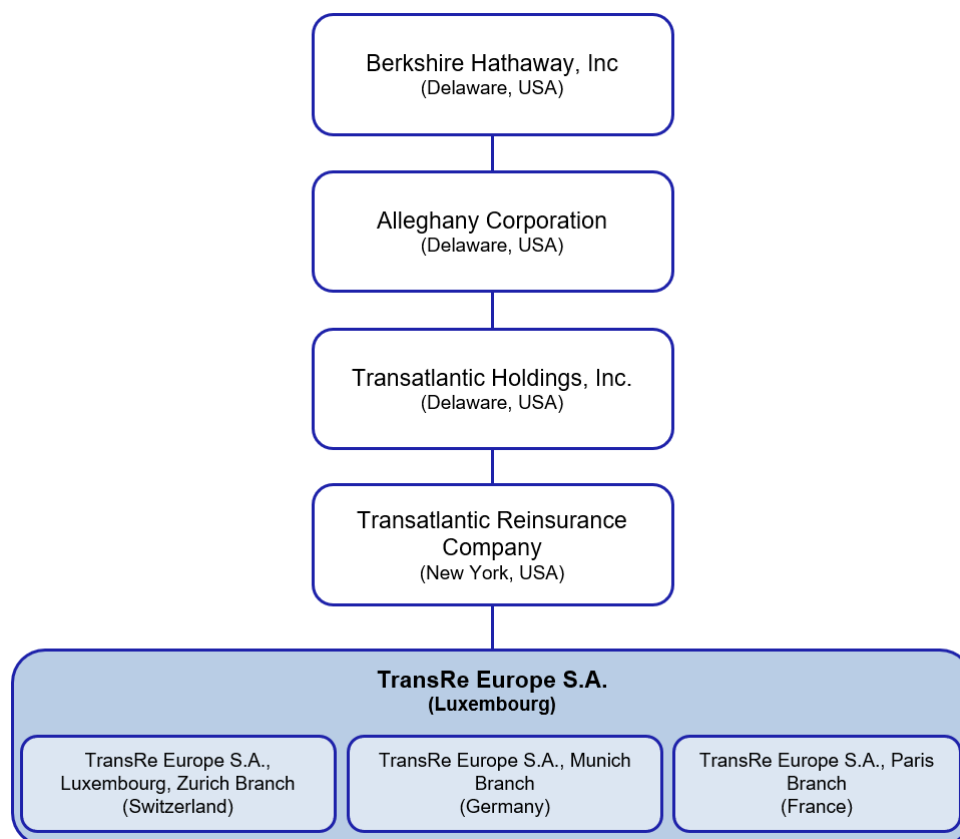
On 14 March 2025, Mr Warren E. Buffett, a U.S. resident, held shares representing approximately 30.3% of the voting interest and approximately 14.3% of the economic interest in Berkshire Hathaway.

Except as identified above, there are no other holders of qualifying holdings in TRE. TRE has no related undertakings as defined in Article 212 of the Solvency II Directive.



The Berkshire Hathaway group of insurance companies is subject to group supervision and the lead supervisor is the Nebraska Department of Insurance, Nebraska, USA.

Figure 3: Simplified organisational structure chart



All subsidiaries of Berkshire Hathaway shown above are 100% owned and controlled.

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

TRE's core reinsurance portfolio of property and casualty treaties provides protection to cedants based globally albeit predominantly in Continental Europe and the Middle East, across a diverse range of lines of businesses. The protection provided includes coverage for a wide range of business events, enabling TRE to better navigate underwriting cycles in multiple classes of business.

In April 2024, following Board approval, TRE paid a dividend of US\$10 million. The dividend was paid out of the profit and loss brought forward as at 31 December 2023 and took into account TRE's current and forecast solvency, its recent and expected financial performance and liquidity; and the market environment in which TRE operates.

TRE benefits from the same financial strength ratings as TRC, being AA+ by S&P and A++ (Superior) by AM Best.

Market commentary

The planned improvements to terms and conditions across most of our lines of business were largely realised during 2022 and continued in 2023 and to a lesser extent in 2024. In certain cases, original insurance rate improvement outpaced reinsurance rates in most lines. Speciality lines, in particular, experienced further rate momentum as a result of the continued Russia/Ukraine conflict and general market improvements,



although pressure remained on signings and there was a reduction in some other orders as cedants took the opportunity to retain more risk in an improved pricing environment.

Capacity is now plentiful again as reinsurers delivered strong profits and retained earnings in 2023 and 2024. Third party capital providers have regained confidence in reinsurance and deployed more capital, especially in 2024 and in the Property Catastrophe space.

Following several successive years of catastrophe XOL losses, 2024 also experienced “secondary peril” losses especially convective storms and floods in Germany (“Rhada”), Central and Eastern Europe (“Boris”) and United Arab Emirates (“Persian Gulf Floods”), while some prior year losses (e.g. July 2023 hailstorms in Italy) crept up quite significantly.

Man made losses are mainly property related risk claims although the liability sector has seen some inflationary pressure on claims. The most material man-made loss in 2024 derived from the riots in New Caledonia.

The geopolitical environment remains highly volatile and uncertain in our region (Middle East / Russia-Ukraine). There is currently limited direct impact on our portfolio, but the situation is being monitored very closely.

We continue approaching the Cyber class cautiously and have started reducing certain participations as the primary rating environment deteriorated in 2024. It remains a very dynamic class with constant evolutions and developments from a risk and coverage perspective. We are committed to a prudent underwriting approach in this class and earmark our capacity for best-in-class carriers that meet our selective and stringent underwriting criteria.

Overall, the current property, casualty and specialty rating environment remains healthy, however TRE continues to be cautious and remains committed to achieving an underwriting profit. Holistic long-term relationships with financially secure reinsurers are still key for most buyers.

Strategy and portfolio

TRE's strategy is to concentrate foremost on achieving underwriting profitability, not top line growth, and to return excess capital and underwriting profit to the group at the appropriate time to support the wider investment objectives of Berkshire Hathaway. The strategy continues to be aligned with the TransRe group vision of being the first-choice provider of reinsurance to TransRe's clients worldwide, maximising the benefits of local presence and global service and offering all products in all territories.

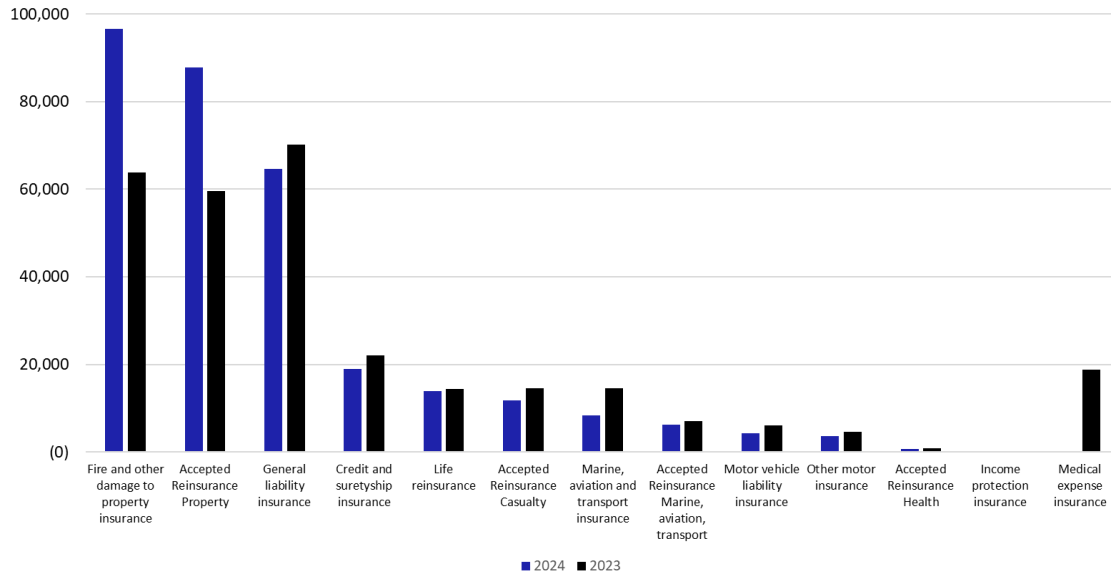
Whilst the significant recent increase in interest rates have generated healthy investment returns in the last two years, the previous 15 years of ultra-low interest rates underline why TRE's focus on underwriting profitability is paramount.

TRE is mindful of the further impacts that the continued volatile and uncertain inflationary environment could have on pricing and claims reserving.



Premium income distribution by line of business and distribution by domicile of cedant is shown in Figures 4 and 5.

Figure 4: Solvency II line of business (gross earned premium US\$'000s)



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

Figure 5a: Geographical domicile of cedants 2024 (gross earned premium US\$'000s)

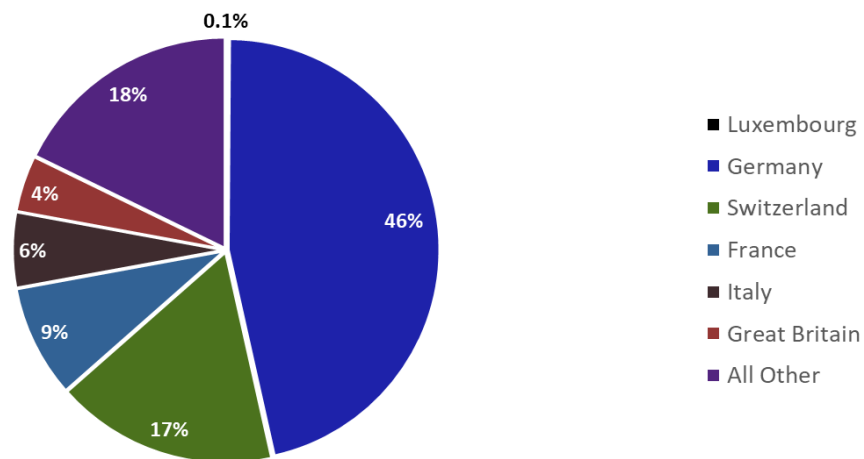
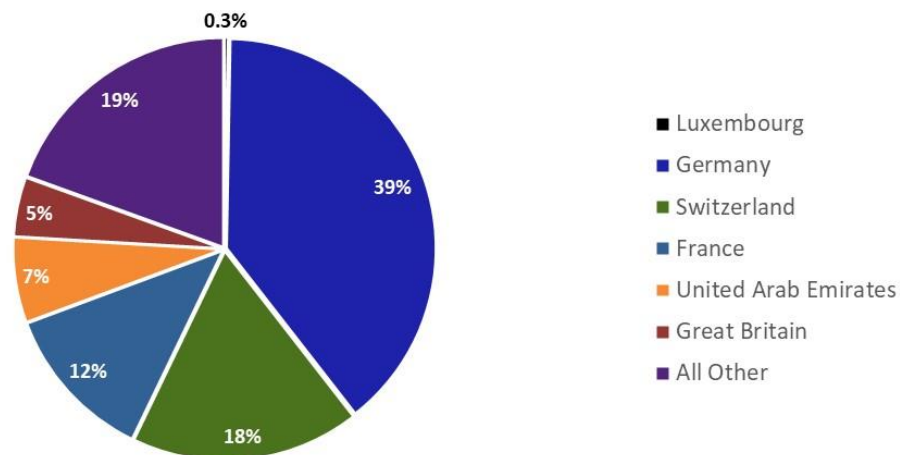




Figure 5b: Geographical domicile of cedants 2023 (gross earned premium US\$'000s)



A.2 Underwriting performance

In 2024, TRE earned US\$ 315,667k (2023:US\$ 297,045k) of gross premium income and US\$ 73,139k (2023: US\$ 91,711k) of net premium income. TRE writes a diverse book of business with no single class dominating the overall portfolio. On a gross basis, fire and other damage to property was the largest component, accounting for 30.6% (2023: 21.5%), accepted non proportional reinsurance property for 27.8% (2023: 20.1%) and general liability insurance for 20.5% (2023: 23.6%). These were followed by credit and suretyship, life reinsurance and accepted reinsurance casualty.

The TRE claims ratio for the period was 74.1% (2023: 58.8%) on a gross basis and 67.5% (2023: 49.4%) on a net basis. The 2024 total net underwriting result was US\$ 4.2 million (2023: US\$ 24.4 million).

TRE's volume of property non-proportional reinsurance increased due to new business and benefiting from hardening market conditions while the exposure remained at the prior year's level. At the same time the volume of fire and other property damage to property business increased through new treaties and improved market conditions.

The net claims ratio increased as a result of the various major events (mainly property catastrophe and fire events). Having operated for over 45 years, TRE's legacy reserves continue to run-off favourably.

Top five underwriting performance by line of business

The table below summarises the performance of TRE's top five Solvency II lines of business. Figures are presented on both a gross assumed basis and on a net basis after all outwards reinsurance, including intragroup retrocession described in Section B1.



Figure 6a: Underwriting performance by SII line of business (gross) 2024

Gross (US\$'000s)	Proportional	Non- Proportional	Proportional	Proportional	Proportional	Other Line of Business	Total
	Fire and other damage to property	Accepted reinsurance property	General liability	Credit and suretyship	Life reinsurance		
Premiums written	116,255	89,349	61,495	18,115	13,660	32,463	331,337
Premiums earned	96,594	87,803	64,576	18,899	13,927	33,867	315,667
Claims incurred	-68,367	-82,457	-37,084	-5,758	-11,755	-28,854	-234,275
Change in other TP	-	-	-	-	321	-	321
Expenses	-41,699	-15,492	-22,987	-10,381	-1,065	-6,173	-97,796
Underwriting profit/loss	-13,472	-10,146	4,506	2,760	1,428	-1,159	-16,083

Figure 6b: Underwriting performance by SII line of business (gross) 2023

Gross (US\$'000s)	Proportional	Proportional	Non- Proportional	Proportional	Proportional	Other Line of Business	Total
	General liability	Fire and other damage to property	Accepted reinsurance property	Credit and suretyship	Medical expense		
Premiums written	71,735	67,658	59,898	20,784	9,369	62,304	291,748
Premiums earned	70,118	63,882	59,664	22,053	18,799	62,529	297,045
Claims incurred	-41,301	-45,938	-11,892	-6,760	-18,352	-51,097	-175,339
Change in other TP	-	-	-	-	-	808	808
Expenses	-25,455	-24,239	-10,889	-11,296	-427	-14,195	-86,501
Underwriting profit/loss	3,361	-6,295	36,884	3,998	20	-1,955	36,013



Figure 7a: Underwriting performance by SII line of business (net) 2024

Net (US\$'000s)	Proportional	Non- Proportional	Proportional	Proportional	Proportional	Other Line of Business	Total
	Fire and other damage to property	Accepted reinsurance property	General liability	Credit and suretyship	Life reinsurance		
Premiums written	24,036	13,260	13,148	3,820	13,660	6,447	74,371
Premiums earned	20,275	12,965	14,530	4,302	13,927	7,140	73,139
Claims incurred	-14,966	-14,812	-1,805	115	-11,755	-6,462	-49,685
Change in other TP	-	-	-	-	321	-	321
Expenses	-7,111	-3,667	-4,215	-2,578	-1,065	-980	-19,616
Underwriting profit	-1,802	-5,514	8,510	1,839	1,428	-302	4,159

Figure 7b: Underwriting performance by SII line of business (net) 2023

Net (US\$'000s)	Proportional	Proportional	Non- Proportional	Proportional	Proportional	Other Line of Business	Total
	General liability	Fire and other damage to property	Accepted reinsurance property	Credit and suretyship	Medical expense		
Premiums written	19,016	15,197	9,300	5,994	3,748	26,313	79,568
Premiums earned	23,598	15,400	9,256	7,741	7,519	28,197	91,711
Claims incurred	-10,501	-9,244	2,414	-1,589	-7,323	-19,898	-46,141
Change in other TP	-	-	-	-	-	808	808
Expenses	-4,195	-6,267	-2,502	-3,207	363	-6,201	-22,009
Underwriting profit	8,902	-111	9,168	2,945	559	2,906	24,369

Fire & other damage to property

TRE increased the business volume on fire and other damage to property insurance mainly through new business written. The portfolio contains property risks cover fire risk in Germany and Switzerland, as well as agricultural risks in Italy and new onshore energy exposure. This line was affected through various catastrophe events (mainly the Persian Gulf floods) and fire loss activity. The net claims ratio for the period was 73.8% (2023: 60.0%).

Accepted reinsurance property

TRE's non-proportional accepted reinsurance property book consists mainly of property catastrophe business with ceding companies domiciled in Continental Europe. The exposure was slightly increased compared to the previous reporting period. TRE was hit by various catastrophe events (e.g., Persian Gulf floods, Rhada in Germany and Boris in Central and Eastern Europe). This negative development was partially offset by positive run-off on prior year events, mainly flood events in Germany that resulted in a net claims ratio for the period of 114.3% (2023: -26.1%).

General liability

The general liability insurance line reduced slightly through smaller shares written with large international ceding companies, providing reinsurance cover for a wide range of underlying risks and classes e.g., general



liability and financial lines. The net claims ratio was 12.4% (2023: 44.5%) resulting from a positive run-off of legacy business.

Credit and suretyship

Credit and suretyship mainly decreased due to smaller shares on existing credit business. The premium earned amounted to US\$ 18.1 million on a gross basis, a decrease from US\$ 20.8 million in 2023. The business is still running very favourably reporting a net claims ratio for the period of -2.7% (2023: 20.5%), benefiting from positive run-off development on the legacy book.

Life reinsurance

Most of the life reinsurance business is in run-off and performing as expected. The premium reduced from US\$ 14.4 million in 2023 to US\$ 13.9 million, whereas the claims ratio improved slightly to 82.1% (2023: 82.9%).

Other lines of business

Other lines of business include accepted non proportional casualty and marine, aviation and transport (proportional and accepted non-proportional reinsurance). The underwriting result of US\$ -0.3 million is a result of negative reserve development on old accepted non proportional casualty losses.

Figure 8a: Underwriting performance by material geographical area (net) 2024

Net (US\$'000s)	Home Country	Germany	Switzerland	France	Italy	Great Britain	Other countries	Total
Premiums written	47	33,310	11,178	5,525	3,956	12,557	7,798	74,371
Premiums earned	85	31,016	11,720	5,281	3,810	12,557	8,669	73,139
Claims incurred	-1,222	-27,614	-5,225	124	-2,594	-11,619	-1,536	-49,685
Change in other TP	-	-	-	-	-	-	321	321
Expenses	401	-9,533	-4,210	-1,393	-559	-859	-3,462	-19,616
Underwriting profit	-737	-6,131	2,285	4,012	657	80	3,992	4,159

Figure 8b: Underwriting performance by material geographical area (net) 2023

Net (US\$'000s)	Home Country	Germany	Switzerland	France	United Arab Emirates	Great Britain	Other countries	Total
Premiums written	175	27,386	13,495	8,741	5,825	12,769	11,177	79,568
Premiums earned	276	31,157	15,337	9,095	7,282	12,769	15,795	91,711
Claims incurred	302	-16,521	-4,807	-3,254	-4,799	-11,859	-5,203	-46,141
Change in other TP	-	-	-	-	-	-	808	808
Expenses	-67	-5,707	-3,852	-1,946	-974	-741	-8,721	-22,009
Underwriting profit	512	8,928	6,678	3,894	1,509	168	2,679	24,369

Germany

This comprises business assumed with large and medium-sized insurance companies domiciled in Germany. The business covers a wide range of property and casualty lines of business written. The 2024 result was significantly affected by the Floods Rhada, riots in New Caledonia, various fire losses and negative reserve development on accepted non proportional casualty reinsurance.



Switzerland

Business assumed with ceding companies domiciled in Switzerland consists of property and property catastrophe business but also specialty casualty business such as credit and suretyship. The result is driven by the positive development on credit and suretyship as well as property business.

France

Business assumed with large and medium-sized insurance companies as well as mutuals domiciled in France covers a wide range of lines of business. TRE benefited from reserve releases on prior year natural catastrophe events.

Italy

TRE was able to increase its exposure within the Italian market mainly through the entry into new reinsurance treaties. The overall result was negatively impacted by the floods in Central and Eastern Europe, reserve increases to the hailstorms in Italy in 2023, partially off-set by positive development on run-off general liability insurance.

Great Britain

Most of the Great Britain business is life business which has been in run-off for years. The business is developing in line with expectations.

Other countries

TRE underwrites business on a global basis with a wide distribution of territories and classes of business. This also includes United Arab Emirates, Saudi Arabia other countries in the MENA region, Spain and Israel.

For more details and the breakdown of premiums, claims and expenses by geographical spread please refer to Quantitative Reporting Template ("QRT") S.05.02.01 in Appendix 2.

A.3 Investment performance

Financial investments

TRE's investment portfolio, excluding cash and deposits, is made up of direct investment in fixed income securities (91.1% of the portfolio by market value at 31 December 2024; 2023: 91.0%) and investment funds. The fixed income portfolio consists of US\$ financial investments (57%), EUR (40%) and CHF (3%), which earned combined net interest income of US\$ 22.8 million during the period (2023: US\$ 18.5 million).

TRE's fixed income securities portfolio is exclusively invested in US (57.1%), German (40.0%) and Swiss (2.8%) government bonds, 77.8% of which are classified as short-term, with original maturities of less than 12 months on the date of purchase. The short-term nature of the portfolio insulates TRE against bond market value reductions and allows it to benefit from elevated short-term yields.

Total investment return

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

The total investment return on TRE's portfolio during 2024 was US\$ 24,905k (2023: US\$ 14,277k) with the total value of the portfolio increasing to US\$ 596,731k as at 31 December 2024 from US\$ 563,694k at the start of the year. During 2024, both the Federal Funds Rate and the ECB Rate dropped by –100bps. As decided by the FED on 18 December 2024, the target range for federal funds rate decreased to 425-450bps and at 24 December 2024 the ECB lowered the base rate to 300bps.

As at 31 December 2024 the book yield for the fixed income portfolio had increased to 4.2% (2023: 2.8%), the portfolio's average duration remained short at 0.5 years (2023: 0.5 years).



Figure 9a: Investment portfolio performance for 2024

Asset Category (US\$'000s)	Income	Gains/ (losses)	Net income/gain or (loss)	Total SII Value (as at 31 December 2024)
Cash and deposits to cedants	876	-	876	62,477
Government Bonds	22,756	210	22,966	543,772
Collective Investments Undertakings	-	1,939	1,939	52,959
Total	23,632	2,149	25,781	659,207

Figure 9b: Investment portfolio performance for 2023

Asset Category (US\$'000s)	Income	Gains/ (losses)	Net income/gain or (loss)	Total SII Value (as at 31 December 2023)
Cash and deposits to cedants	907	-	907	74,592
Corporate Bonds	154	2,122	2,275	-
Government Bonds	18,274	-6,763	11,511	513,021
Collateralised securities	90	377	467	-
Collective Investments Undertakings	3	20	23	50,673
Total	19,427	-4,244	15,184	638,286

Securitisations

TRE did not have any securitised investment vehicles at 31 December 2024 (2023: \$nil).

A.4 Performance of other activities

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

TRE's reporting and presentational currency is US\$. The operating results and financial position of each non-US\$ ledger are translated into US\$. All resulting exchange differences are recognised in the statement of profit and loss.

A.5 Any other information

Financial risks associated with Climate Change

Sustainability & Resilience ("S&R") and risks associated with climate change continue to be areas of focus in the (re)insurance community and the broader economy. These considerations include climate-related financial risks, which can be further classified as physical, transition and liability risks as follows:

- Physical risk, including increasing frequency or severity of severe weather perils which may be considered acute (such as hurricanes, flooding and wildfire) or chronic (such as increasing temperatures or sea level rise).
- Transition risk, including potential costs to society arising from the transition to a low-carbon economy through changes in public or regulatory policy, changes in the affordability of existing technologies such as wind and solar energy generation, or the innovation of new technologies that allow for the removal of greenhouse gases from the atmosphere. This transition may lead to so-called stranded assets in carbon-intensive sectors and industries such as the fossil fuel industry and associated infrastructure, producers and servicers of vehicles using internal combustion engines as well as other sectors such as shipping and real estate.
- Liability risk, also referred to as climate litigation risk, defined by the International Association of Insurance Supervisors as "the risk of climate-related claims under liability policies, as well as direct actions against insurers, for failing to manage climate risks." Professional liability is one line in particular that could see the impact of increased costs relating to S&R related litigation.



Physical, transition and liability risks may impact (re)insurers' property and liability portfolios, including general casualty, professional liability, and other lines of business, as well as their investments and operations.

Climate change governance matters are addressed in sections B and C.

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



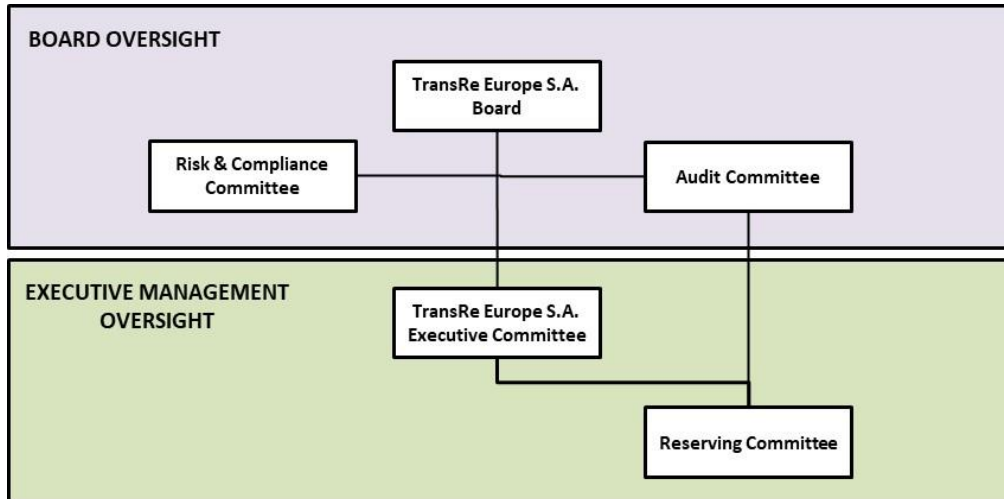
B. System of Governance

B.1 General information on the system of governance

TRE'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 TRE's key governance bodies is shown in Figure 10.

Figure 10: Governance oversight and reporting lines at 31 December 2024



The Board maintains ultimate responsibility for overseeing the running of TRE. Its responsibilities include:

- setting, promoting and demonstrating TRE's culture, vision and values;
- setting TRE's business strategy and monitoring performance against its business plan;
- approving TRE's risk appetite and tolerances;
- reviewing the adequacy and appropriateness of TRE's reserves;
- maintaining oversight of TRE's compliance with relevant laws and regulation;
- maintaining oversight over the effectiveness of TRE's corporate governance framework and internal control framework;
- supervision of management.

Decisions are adopted by a majority vote of the directors' present or represented at such meeting.

The Company is led by Independent Non-Executive Directors ("INED"), Non-Executive Directors ("NED") and the Chief Executive Officer ("CEO"). The CEO oversees the company's activities under the supervision of the INEDs and NEDs.

The Board collectively possesses appropriate qualification, experience and knowledge about insurance and financial markets, system of governance, financial and actuarial analysis, regulatory framework and requirements, business strategy and business model.

Members of the Board are appointed for a duration of one year and are re-elected or resign during the annual general meeting of shareholders.



The members of the Board at 31 December 2024 are identified in Figure 11.

Figure 11: Board members and committee memberships

Board Member	Role	Committees
Matthew Mahoney	Non-Executive Chair, Class A-Director	Audit (Internal Audit Key Function Holder)
Andrew Taylor	Non-Executive Director, Class A-Director	
Emmanuel Clarke	Non-Executive Director, Class A-Director	Chair of Risk & Compliance
Pierre-Michaël de Waersegger	Independent Non-Executive Director, Class B-Director	Audit, Risk & Compliance
Anne Canel	Independent Non-Executive Director, Class B-Director	Chair of Audit
Peter Clements	Executive Director, CEO, Class B-Director	Risk & Compliance

Jonathan Hewitt resigned from the Board on 16 April 2024 and Peter Clements was appointed to the Board on that same date.

As provided in the Articles of Association, the Board meets at least four times a year. Additional meetings can be requested by the chairman or by any Director.

The Board may create one or several committees such as the Risk & Compliance and Audit committees. The composition and the powers of such committee(s), the terms of the appointment, removal, remuneration and duration of the mandate of its/their members, as well as its/their rules of procedure are determined by the Board. The Board shall be in charge of the supervision of the activities of the committee(s).

Risk & Compliance Committee

The Risk & Compliance Committee's responsibilities include:

Risk

- providing oversight and challenge to the effectiveness of TRE's Risk Management function, Enterprise Risk Management ("ERM") framework and risk management culture, including the adherence to the Board agreed appetites and tolerances, engagement with TRE's key business functions and progress embedding ERM in TRE;
- discussing and reviewing guidelines and policies governing the process by which the management of TRE and the relevant operations of TRE assess, monitor and manage TRE's exposure to risk; and
- monitoring the effectiveness of TRE's risk management and internal control systems, including financial, operational and compliance controls, and making any recommendations to the Board.

Compliance

- monitoring the effectiveness of TRE's internal control systems and compliance controls and reporting any recommendations to the Board;
- providing oversight and challenge to the effectiveness of TRE's Compliance Function and approving the Compliance Monitoring and Training Plan and overseeing progress against it;
- monitoring and adapting to changes in Laws and Regulations; and
- such other duties that may from time to time be requested by the Board.

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

Audit Committee

The objectives of the Audit Committee include:

- monitoring and reviewing the effectiveness of TRE'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 TRE and any formal announcements relating to TRE's financial performance;



- reviewing TRE'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 Audit Committee meets at least four times per year.

Executive Committee

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

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

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

The Executive Committee meets at least four times per year.

Reserving Committee

TRE's Reserving Committee is led by the CFO and reports to the Executive and Audit Committees. It is responsible for:

- establishing, recommending and maintaining oversight of the reserving strategy;
- maintaining oversight on the reserving policy to ensure it is fit for purpose;
- considering the performance of previously set reserves against actual outcomes and investigating where material differences are identified;
- reviewing and questioning the quarterly reserving process and the material assumptions therein;
- subject to any recommendations, endorsing the actuarially proposed reserve to the Board;
- maintaining oversight of interaction on reserving with the external auditors; and
- such other duties that may from time to time be requested by the Board.

The Reserving Committee meets at least quarterly.

Key functions

TRE fulfils the requirements of the Solvency II directive regarding the key functions of risk management, compliance, internal audit and actuarial with four suitably qualified individuals.

The key functions have their own teams and reporting lines. Each key function reviews its resource needs on at least an annual basis and the key function holder is responsible for ensuring the key function has the necessary authority, resources and operational independence.

All key functions report to the Board or a committee of the Board. Further information on the authority, resources and operational independence of the key control functions is included in Sections B.3 (Risk Management function), B.4 (Compliance function), B.5 (Internal Audit function) and B.6 (Actuarial function).



Figure 12: Key functions

Key Function	Holder
Risk Management System	Head of Risk
Compliance	Head of Legal & Compliance
Internal Audit	Non-Executive Director responsible for Internal Audit
Actuarial	Head of Actuarial

Remuneration policies and practices

Approach to remuneration

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

Assessment of performance

Reviews are performed by line managers and reviewed by senior management and Human Resources. This is a key component of the appraisal process to ensure TRE performance is linked to rewards.

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

Fixed and variable components of remuneration

Remuneration is made up of two key elements, fixed and variable. The fixed element is base salary. The variable element includes an annual bonus and, in some instances, deferred compensation. Base salary, bonus and deferred compensation are reviewed annually taking the previous assessment of performance into consideration.

There are no entitlements to share options or shares.

Benefits

The TRE Executive Committee considers all elements of the benefit package (including pension, private medical, health and life insurance) offered to employees. The benefits are designed to be competitive and to provide health and retirement benefits.

There are no supplementary pensions or early retirement schemes for the members of the Board.

Material transactions with shareholders

TRE benefits from a whole account quota share treaty with TRC as reinsurer (the "TRC Quota Share", effective for all new or renewed non-life business on or after 1 July 2019). TRE has furthermore an excess of loss whole account retrocession agreement with TRC as reinsurer (the "TRC Whole Account XL") which covers losses on the non-life reinsurance book of business (per risk or event).

In addition to the above, TRC entered into the TRC Capital Support Agreement in favour of TRE. Under the TRC Capital Support Agreement, TRC agrees to maintain TRE's regulatory capital in an amount greater than TRE's SCR.

Other than the TRC Quota Share, TRC Whole Account XL, TRC Capital Support Agreement and the outsourcing arrangements described in Section B.7, TRE does not have any material transactions with the shareholders, members of the management body or those who can exert significant influence over the business.

TRE 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

TRE has a Fit and Proper policy in place which defines the procedure for assessing the fitness and propriety of persons who are effectively running the company or hold a key function.

The members of the Board collectively possess appropriate qualifications, experience and knowledge about at least:

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

TRE ensures that senior management and key function holders are at all times fit and proper persons.

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

- the personal characteristics (including being of good repute and integrity);
- the level of competence, knowledge and experience; and
- the qualifications required.

Any breaches of the fit and proper requirements are internally reported to the Head of Risk and the Head of Legal & Compliance. TRE's Head of Legal & Compliance is responsible for notifying the relevant regulator of the change in circumstances and any remedial action that is being undertaken by TRE.

All key function holders and senior management are required to undertake a code of conduct training on subjects such as regulatory awareness, insider trading, anti-money laundering, and others. The Corporate Compliance function organizes regular trainings on the Alleghany Code of Business Conduct and Ethics.

Training and competency

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

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

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

B.3 Risk management system including the ORSA

TRE's ERM framework has been developed to enable the Board and senior management to understand and appropriately manage and mitigate the risks associated with its objectives over the short, medium and longer term in a manner that is commensurate with TRE'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 TRE, improve decision-making and support the achievement of TRE's business objectives. In summary, the purpose of TRE's ERM framework is to:

- actively sponsor and foster a risk aware culture across TRE, supporting staff in making risk management-based judgements, encouraging effective management of exposures within TRE'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 considered in key business decisions;
- ensure risk taking activities are consistent with TransRe's broader risk management vision and appetites;
- ensure that the 'three lines of defence' model operates effectively;



- implement risk strategies and policies that align with TransRe's and TRE'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 to mitigate them; and
- sustain a robust Own Risk and Solvency Assessment ("ORSA") process that informs management's view of risk and capital.

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

By adopting this approach, TRE believes it can effectively identify, measure, monitor, manage and report risks at an individual/contract level and at an aggregated level on an ongoing basis.

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

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

TRE's Risk Management function is integrated into TRE and TransRe through the governance reporting lines to TRE's CEO, the Risk & Compliance Committee and TransRe's Chief Risk Officer and involvement in key decision-making forums. In addition, the Risk Management function's roles and responsibilities include:

- 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; and
- providing input and challenge into the development of realistic stress and reverse stress tests for TRE.

By adopting such an approach, TRE ensures that ERM is a key consideration in the decision-making process.

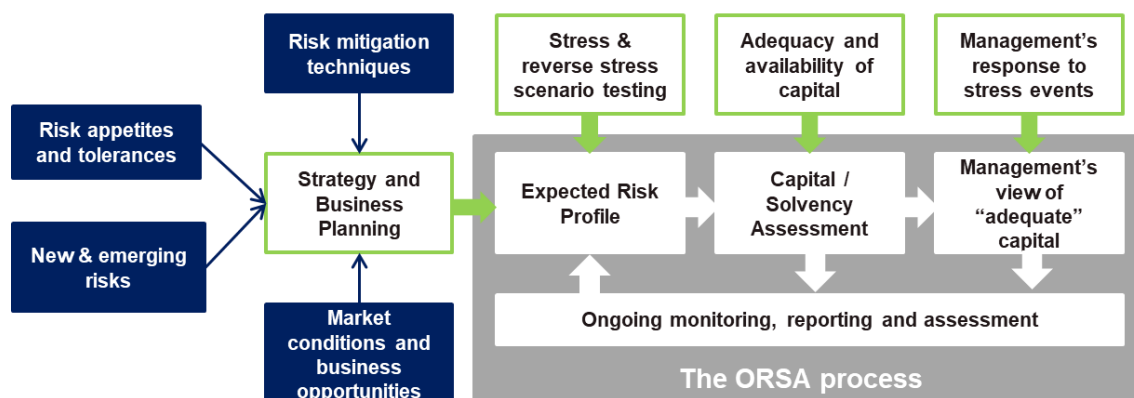
Own Risk and Solvency Assessment

The ORSA process considers TRE's own solvency assessment against its risk profile, business objectives and capital management strategy in comparison to its regulatory solvency requirement in order to determine whether additional capital is required. The ORSA also considers the impact on TRE should it be subject to significant losses arising from both insurance and non-insurance events. The ORSA considers what actions TRE management would undertake to mitigate the impact of these extreme events. Furthermore, as part of the ORSA process, TRE considers the amount of capital it should maintain to meet its contractual liabilities to "ultimate". TRE produces an ORSA report on at least an annual basis. The ORSA is considered a key management tool and is linked to TRE's business planning and strategy, risks TRE is exposed to and the associated capital.



The ORSA process is represented diagrammatically as follows:

Figure 13: TRE's ORSA process



The ORSA process provides TRE with a mechanism to assess the risks it faces and to determine the necessary level of capital required to ensure TRE meets its strategic and business objectives. The ORSA is TRE'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 TRE, whilst being mindful of its risk profile and business environment.

The Board and senior management provide input and review the scenarios considered within the ORSA stress tests. In addition, 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 are reported to the Risk & Compliance 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 & Compliance Committee; this aids senior management in monitoring TRE's capital adequacy.

The Risk Management function coordinates the relevant processes with subject matter experts across the business and prepares the ORSA report for review and discussion by the Executive Committee, the Risk & Compliance Committee and ultimately the Board. Once the report is reviewed, the ORSA and the amount of capital TRE intends to maintain, based on its expected risk profile, is approved by the Board and the ORSA report is shared with the CAA.

B.4 Internal control system

Within TRE, 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 Risk Management, Compliance and Actuarial functions; and
- independent assurance provided by the Internal Audit function.

The financial control framework is designed to ensure that:

- risks relevant to the preparation and fair presentation of the financial statements in accordance with the applicable financial reporting framework have been identified and documented;
- TRE is in compliance with Sarbanes Oxley requirements of its ultimate parent company; 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 statutory financial statements are subject to rigorous controls in the production and review leading up to publishing. The technical provisions 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, TRE's Internal Audit function, through planned and commissioned reviews of TRE's processes, provides an independent opinion on the internal control framework of TRE's business.

Compliance function

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

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

TRE's Compliance function reports on a quarterly basis to the Executive Committee and Risk & Compliance Committee, as well as to TransRe's group compliance department. The Compliance function is responsible for reporting to senior management any breaches of, or non-compliance with, its policy or any other relevant policy, rules and regulations. The Compliance function has sufficient authority to carry out its functions on its own initiative without obstruction from management and other staff members.

In order to underline independence, the Compliance Officer has direct and unrestricted access to the Executive Committee, Board of Directors and Group Compliance.

The Compliance function's responsibilities include:

- advising the Board on compliance with CAA Rules and related law and regulation;
- providing training and guidance regarding applicable law and regulation and TransRe's and TRE's policies and clearly communicating ethical guidance;
- assessing the possible impact of any changes in the legal and regulatory environment on the operations of TRE;
- identifying and assessing compliance risks relevant to TRE and managing the control environment that mitigates those risks;
- checking compliance with the data privacy law, anti-discrimination regulation and group directives;
- follow-up of changes in the Alleghany Code of Business Conduct and Ethics and local implementation;
- undertaking compliance monitoring and making recommendations to improve the effectiveness of compliance practices; and
- identifying TRE compliance training needs and working with TransRe's Corporate Compliance Department and Human Resources to implement effective compliance training programmes.

B.5 Internal Audit function

Internal Audit is an independent function that provides objective challenge and assurance over TRE. Internal Audit supports TRE in accomplishing its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

Throughout 2024, the TRE Internal Audit function was led by the TransRe Director of Internal Audit, based in New York, USA under the oversight of the TRE Internal Audit key function holder. Those carrying out the activities of the Internal Audit function do not assume any other key functions.

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



B.6 Actuarial function

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

The Actuarial function is responsible for:

- coordinating the calculation of technical provisions;
- ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
- assessing the sufficiency and quality of the data used in the calculation of technical provisions;
- comparing best estimates against experience;
- informing the administrative, management or supervisory body of the reliability and adequacy of the calculation of technical provisions;
- expressing an opinion on the overall underwriting policy;
- expressing an opinion on the adequacy of reinsurance arrangements; and
- contributing to the effective implementation of the risk-management system.

The Actuarial function reports on a quarterly basis to the Reserving Committee. In addition, an annual internal Actuarial Function Report is provided to the Board.

B.7 Outsourcing

Outsourcing management

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

TRE’s Head of Legal & Compliance maintains the outsourcing register.

Outsourcing of critical or important operational functions

Details of outsourcing in respect of TRE’s critical or important operational functions are set out in Figure 14.

Figure 14: Outsourcing of critical or important operational functions

Outsourcing	Jurisdiction
Certain intra-group services and support services are provided by TRC.	New York, USA
TRE outsources the day-to-day activities of its Internal Audit function to TRC, as described in Section B.5.	New York, USA
TRE’s day-to-day investment management activities are outsourced to New England Asset Management Limited (“NEAM”), a member of the Berkshire Hathaway group. NEAM’s performance is monitored by TransRe’s treasury and investment management function, based in New York, USA, with further oversight provided by TRE’s CFO.	Ireland

B.8 Any other information

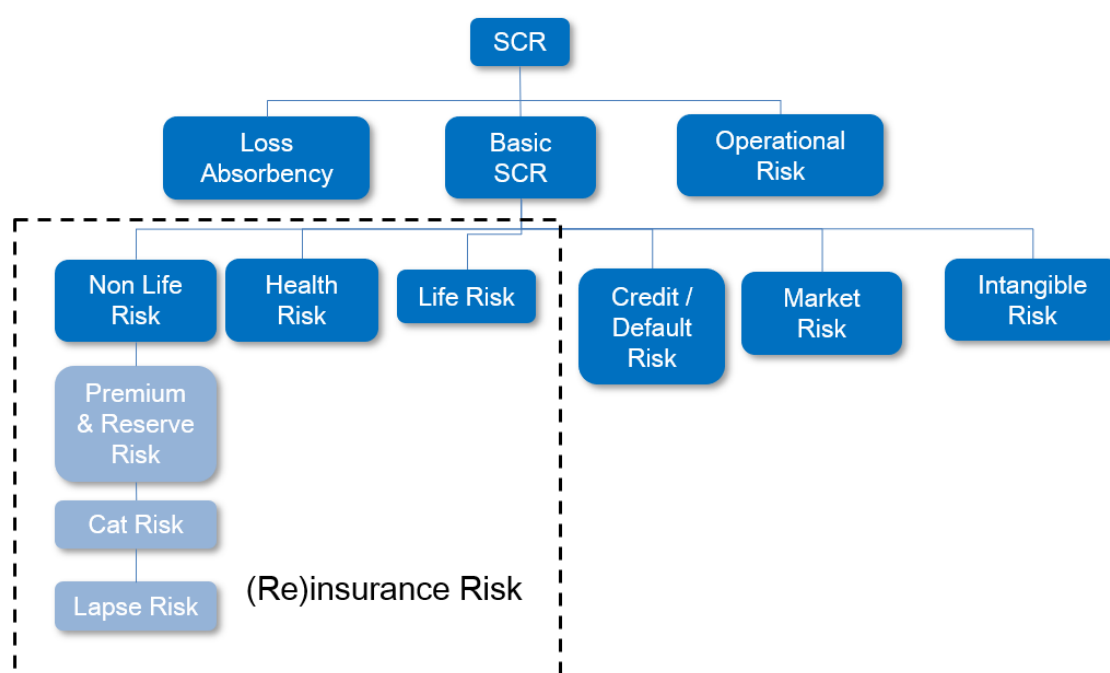
TRE does not consider there to be any other material information to disclose on its system of governance.



C. Risk profile

TRE provides specialist non-life and life reinsurance. Under Solvency II, TRE's 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 15: Standard Formula risk modules



The quantitative contribution of TRE's risk modules to TRE's SCR including diversification benefits is set out in Section E.2.

Application of the prudent person principle to market, credit, and liquidity risk

When making investment decisions, TRE considers the risks associated with its investments, including the potential impacts of any economic shock, the investments' liquidity and their treatment under CAA Rules. All assets are managed in accordance with the prudent person principle as described below.

Market Risk

All assets are invested in liquid and highly rated securities that aim to ensure the security, quality, liquidity and profitability of the portfolio as a whole. All assets are held in TRE designated portfolios which ensures their availability to TRE only.

TRE's investment strategy is ultimately approved by the Board and is reviewed by TRE's CFO. Assets covering the technical provisions must be invested in a manner appropriate to TRE's reinsurance liabilities. TRE does not permit investment in any asset category that is not included in its investment mandate. TRE does not hold any derivatives.

Credit Risk

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



Liquidity Risk

TRE's assets are prudently invested taking into account the liquidity requirements of the business and the nature and timing of TRE's (re)insurance liabilities. TRE manages its liquidity risk by maintaining a highly liquid investment portfolio, which is of superior credit quality and short average duration.

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

C.1 Reinsurance / underwriting risk / life risk

TRE underwrites a diversified portfolio of property and casualty as well as life reinsurance across multiple regions and classes.

Key underwriting risks to which TRE is exposed include:

- Premium / underwriting risk
 - underwriting outside of appetite;
 - excess exposures in certain classes and/or territories;
 - underwriting below the technical price or without adequate risk transfer;
- Retrocession risk
 - failure to follow retrocession procedures and guidelines, or design and operation of retrocession programmes;
- Reserve risk
 - inadequate reserving due to flaws in the provisioning/reserving methodology or in the application of the methodology, inadequate Incurred But Not Reported ("IBNR") and inadequate Incurred But Not Enough Reported ("IBNER");
- Catastrophe Risk
 - excessive aggregation/catastrophe risks in a single region/location.

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

Premium / underwriting risk management and mitigation techniques

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

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

- ongoing monitoring and exposure management that includes assessing individual and aggregate exposures across all lines of business and geographical territories;
- exposures assessed and tracked against risk tolerances; and
- ongoing stress tests and simulations of a range of extreme events

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

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

TRE's main risk concentration continues to relate to natural catastrophe exposure in Europe.

Retrocession risk management

TRE benefits from a retrocession programme that provides protection for TransRe globally as well as TRE specifically. Risks associated with retrocession are managed and mitigated by ensuring that all retrocession placements are subject to individual review and approval.



TRE benefits from protection provided by two special purpose vehicle ("SPV") arrangements:

- a series of reinsurance sidecars (referred to as Pangaea) subject to aggregate limits beyond which losses fall back to TRE; and
- a collateralised catastrophe bond, referred to as Bowline Re 2022-1 (\$165m). This bond provides the TransRe group with protection for predominantly US and Canadian natural catastrophe risks.

Both arrangements are overseen by TRC and focus on protecting the TransRe group, including the Company, from excessive natural catastrophe losses. These arrangements are sponsored by TransRe and are funded by third party capital providers. Liabilities relating to the Bowline Re catastrophe bond are fully collateralised. The liabilities relating to Pangaea are collateralised with two levels of loss, a 1:345-year return period and 1:500-year return period based on the specific agreement negotiated with those participants not having an acceptable external credit rating. Where a participant has an acceptable external credit rating no collateral is held.

Key controls that aid in mitigating retrocession risk include:

- retrocession procedures;
- Alleghany's oversight and approval; and
- TRC's Counterparty Risk Committee.

Reserve risk management

Reserve risk is managed by TRE's Actuarial function with oversight provided by the Reserving Committee and ultimately the Board. Key controls to manage this risk include:

- a comprehensive annual reserve study;
- quarterly reserve reviews;
- reserving risk management information that includes major activity reports, high cost claim alerts, major loss memos and retrocession transaction alerts; and
- independent validation of reserves.

Risk sensitivity for underwriting risks

TRE undertakes detailed stress and scenario testing on an annual and ad-hoc basis with the results presented at the Risk & Compliance Committee and at the Board and as part of its ORSA process.

As part of the ORSA process, the current and projected solvency position over the business planning period are calculated following adverse stresses at different return periods for the material underwriting risks (each risk's stress is considered individually) in addition to multiple losses arising from non-correlating events (for example market risks and underwriting risks or a series of underwriting events). Consideration is also given to a material deterioration in TRE's reserves, including adverse development in both claims ratios and IBNR. The results of this analysis showed that in 2024, the most material impact on the SCR arises from a combination of a Nat Cat event and a higher underlying loss ratio. The analysis undertaken indicates TRE is strongly capitalised and it would take an extreme event to breach the SCR. TRE's underwriting risk profile is therefore resilient to severe shocks and events and is within the Board approved risk appetite. Sensitivity analysis is provided in further detail in section C.7.

Processes for monitoring the effectiveness of risk mitigation techniques

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

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



C.2 Market risk

Market risk arises from fluctuations in values of, or income from, assets. It includes risks associated with the use of financial instruments, movements in interest rates, foreign exchange exposure, equity investments and valuation processes.

Figure 16: Standard Formula market risk sub-modules



The Board reviews, at least annually, TRE's investment strategy which is based on three key principles, to:

1. preserve capital;
2. increase surplus; and
3. maintain liquidity.

TRE's investment strategy forms the basis for the investment mandate given to TRE's investment manager. The mandate includes limits on certain classes and types of investments, restriction on investments in certain industries, sector and geographical limits. The execution of TRE's investment strategy is subject to ongoing monitoring and oversight by the TRE CFO and the Board.

TRE's fixed income investment portfolio is composed of short-dated government bonds, which have significantly lower sensitivity to market interest rate movements. Accordingly, TRE's investment returns are stable and secure, aligned to the yield on short-dated government bonds.

TRE's exposure to market risk components is described below:

Interest rate risk

Movements in market interest rates affect the amount and timing of cash flows for TRE 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, TRE's investment manager adheres to the investment guidelines established by the Board which align with the investment strategy and TransRe's overall objectives. The impact of interest rate risk on the short-term fixed income investment portfolio is therefore limited.

Spread risk

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

With all of its fixed income investment portfolio invested in government bonds and with an average credit quality of AA+ (2023: AA+), TRE has no significant exposure to spread risk.

Equity Risk

Equity risk is the potential financial loss arising from the reduction in the value of the investment portfolio due to changes in prices of equities, mutual funds and equity-linked capital market instruments. TRE's exposure to equity risk is stemming from the investment in collective investment undertakings.

Currency risk

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



Market risk management and mitigation techniques

TRE 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;
 - issuer limitations; and
 - currency;
- Board oversight;
- stress testing; and
- market risk analyses, including extreme market and currency stress tests.

As at 31 December 2024, TRE mostly invested in government bonds (83%; 2023: 80%) with the remainder invested in cash and deposits (9%; 2023: 12%) and collective investments undertakings (8%; 2023: 8%).

Credit quality of fixed income portfolio

As at 31 December 2024, 43% of TRE's fixed income investment portfolio was rated AAA (2023: 41%) and 57% was rated AA (2023: 59%).

Risk sensitivity for market risks

TRE performs stress and scenario testing as part of its approach to managing market risk. Results are presented at the Board and considered as part of the ORSA process.

TRE's ORSA process, includes recalculating the solvency position and the projected solvency position over the business planning period following adverse stresses, including a 300bps change in interest rates in both directions and a prolonged economic downturn.

Under all of these scenarios, the analysis indicated that TRE was strongly capitalised and was able to withstand these extreme shocks without breaching its SCR. Sensitivity analysis is provided in further detail in section C.7.

Processes for monitoring the effectiveness of risk mitigation techniques

TRE benefits from ongoing oversight of its fixed income investment portfolio by TransRe's Treasury function, supplemented by oversight provided by TRE's CFO. Furthermore, the extreme stress tests incorporated into the ORSA process, TRE's risk register and the annual and ad-hoc stress and scenario testing that TRE performs supplement these controls.

TRE'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.

C.3 Counterparty default (credit risk)

Credit risk is assumed whenever TRE is exposed to a loss if another party fails to perform its financial obligations to TRE, including the failure to perform them in a timely manner. This includes default by brokers, retrocessionaires, customers and investment counterparties. Included within this category is the management of the credit risk associated with the intragroup retrocessions described in Section B.1.

There has been no change in TRE's credit risk appetite or approach during 2024.

Brokers, intermediaries and retrocessionaires

Similar to other insurance and reinsurance companies, TRE has a concentration risk with brokers and intermediaries, as they represent a major conduit of business to TRE. All brokers, intermediaries and retrocessionaires are subject to ongoing review.



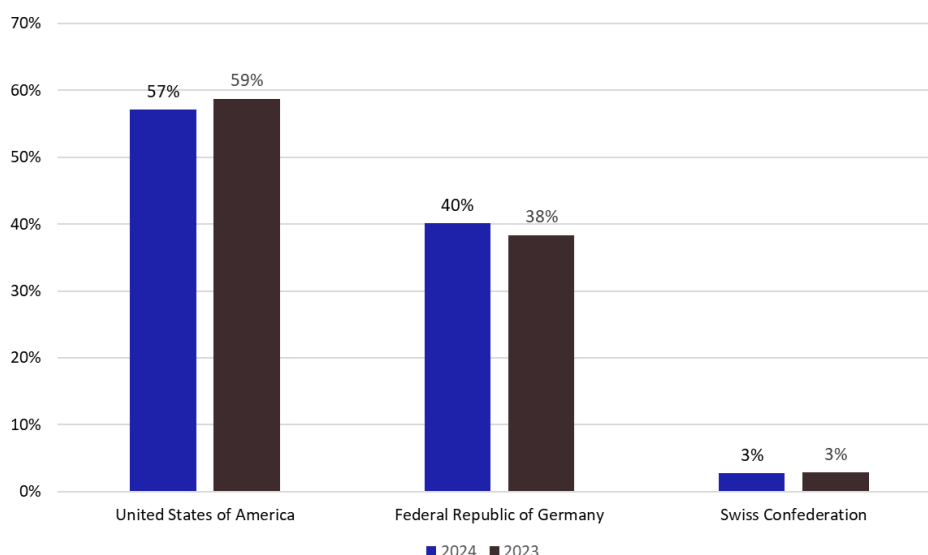
Prior to transacting with brokers, cedants or ceded reinsurers for the first time, a KYC check is carried out.

Retrocessionaires must go through a credit and security assessment.

Investment counterparties

TRE maintains a highly rated investment portfolio in its three functional currencies: US\$, EUR and CHF. TRE's investment exposure being to US, German and Swiss Government Bonds.

Figure 17: Top portfolio issuer exposures as at 31 December 2024 and 2023



TRE's credit risk management strategies include setting and monitoring the credit rating requirements for its investments. Adherence with these requirements helps to ensure investments are selected in a way that enables the effective management of the risk of counterparty default to an acceptable level in line with TRE and TransRe approved risk appetite and tolerances.

Use of External Credit Rating agencies

To aid the monitoring of compliance with the credit rating requirements of TRE's credit risk management strategy and to minimise the risk of counterparty failure arising from external parties, TRE has established limits that its external investment manager must adhere to, accompanied by key risk indicators which are consistent with its investment strategy, 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.

TRE uses external credit assessments primarily to assess the credit quality of assets in its investment portfolios; and of its retrocessionaires.

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

TRC Whole Account XL and TRC Quota Share

The retrocessions provided by TRC represent TRE's largest credit risk. To manage this risk, the adequacy of TRC capital is monitored on an ongoing basis, with regular updates provided by Global Risk Management ("GRM"). This is further supplemented by the presence of TransRe Group's CFO & COO being the Non-Executive Chair of TRE.

Cash held at banks

As part of TRE's commitment to paying claims in a timely manner, TRE maintains cash deposits at local banks domiciled within the EU and Switzerland. Amounts held at these institutions vary throughout the year and are based on cashflow forecasting and expected claims payment patterns.



Key controls

Key controls to mitigate credit risk include:

- investment risk and underwriting risk reporting;
- mandates and guidelines contained in the investment management agreement.

Risk sensitivity for credit risks

The sensitivity of the solvency ratio to credit defaults or rating downgrades of TRE's counterparties has been considered as part of the risk management system (which includes the credit risk associated with the TRC Whole Account XL and TRC Quota Share). The analysis demonstrated that TRE is resilient to a range of events including severe counterparty rating downgrades.

Processes for monitoring the effectiveness of risk mitigation techniques

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

C.4 Liquidity risk

Liquidity risk would arise if TRE 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.

As at 31 December 2024, TRE continued to maintain assets in high quality liquid investments held in functional currencies.

Key controls

Key controls to mitigate this risk include:

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

Risk sensitivity for liquidity risk

TRE has carried out stress and scenario testing as part of its approach to managing liquidity risk. Results have been reviewed by the Risk & Compliance Committee and the Board.

Process for monitoring the effectiveness of risk mitigation techniques

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

Expected profit included in future premiums ("EPIFP")

As of 31 December 2024 the EPIFP is US\$ 50,517k (2023: US\$ 43,154k).

C.5 Operational risk

Operational Risk is the risk of loss arising from inadequate or failed internal processes, personnel or systems, or from external events, including legal risks but excluding risks arising from strategic decisions and reputational risks. 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 TRE is divided into the following key risk areas:

- regulatory and legal – the risk of legal or regulatory sanctions or loss caused by a failure to comply with applicable laws, regulations, internal policy and standards of best practice;



- financial crime, including internal and external fraud – the risk that the firm might be used as a vehicle for financial crime;
- cyber threats / data breaches and data privacy – the risks associated with unauthorised access to TRE's systems caused by internal and external security breaches;
- financial & accounting – the risks associated with financial reporting and integrity of financial information;
- people – the risk that people do not follow TRE's procedures, practices and/or rules, thus deviating from expected behaviour in a way that could damage TRE;
- business continuity events and management – the risk associated with the failure to appropriately manage unforeseen events;
- IT processes and systems - the risks associated with IT systems including processing and system failures;
- model risk – the risk that the output from the models used by TRE is incorrect or flawed due to errors in the design or operation or management's failure to understand the models' limitations;
- outsourcing – failures relating to the outsourcing of key activities;
- artificial intelligence ("AI") – the risks associated with the operation of AI in TRE;
- external events and other changes – failure to react to changes in the external business environment; and
- physical security - incidents and events that threaten TRE's own security

TRE does not have any material concentrations to operational risk. There has been no change in TRE's operational risk appetite or approach during 2024.

Each quarter, TRE's Directors and senior managers assess the key operational risks, causes and consequences together with relevant mitigating controls, within their ownership and span of control. The results of the assessment are recorded in TRE's risk register and reviewed by the Risk & Compliance Committee.

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

Key controls

Key mitigating controls include:

- Risk & Compliance Committee oversight of key operational risk metrics;
- quarterly reviews by risk owners assessing the effectiveness of mitigating controls;
- policies and procedures, the Alleghany Code of Business Conduct and Ethics, penetration and attack testing, business continuity plans and succession planning;
- service level agreements;
- personnel training, oversight and appraisals;
- purchase of insurance; and
- underwriting audits.

Risk sensitivities for operational risk

TRE carries out stress and scenario testing as part of its approach to managing operational risk. Results are presented to the Risk & Compliance Committee and considered as part of the ORSA process.

Within TRE's ORSA process, current and projected solvency positions over the business planning period are re-calculated following a range of adverse operational risk stresses to ensure that under a range of modelled scenarios, TRE is able to withstand these stresses without breaching its SCR.

Process for monitoring the effectiveness of risk mitigation techniques

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

- key risks facing TRE, including mitigating controls and their effectiveness;
- operational risk events and losses;
- the environment in which TRE 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 operational events or near misses and to continually enhance its risk management framework.

C.6 Other material risks

Franchise/reputation risk:

TRE recognises that its long-term success depends on the protection of its relationship with clients, brokers, credit rating agencies, regulators and capital providers and on the strength of the reputation of TransRe and its affiliates.

Group risk:

As a wholly owned subsidiary of a large international group, there is a risk TRE could be adversely affected by the actions of another company within the group.

Emerging risks:

On an ongoing basis, TransRe and TRE undertake horizon scanning with a view to identifying new and emerging risks. TransRe has organised annual Global Emerging Risk Forums beginning in 2016. These forums are attended by senior level global executives and employees from TransRe. The results of the forums are then presented to the Corporate Risk Management Committee ("CRMC") and to the TRE Risk & Compliance Committee.

Sustainability and Resilience (including risks associated with Climate Change):

TransRe has an established governance framework and internal control system which considers sustainability and resilience. The governance structure enables the Board to discharge its oversight responsibilities, helping to ensure TransRe meets its strategic objectives while managing risks within its stated risk appetite, including considering climate related issues in business plans and exposure to risks.

TransRe has established a Sustainability & Resilience Committee which reports directly into CRMC and the TransRe Board. The Committee includes representatives from all disciplines within TransRe.

The S&R function at TransRe is embedded within GRM and is responsible for monitoring and management of risks and opportunities arising from sustainability-related issues including climate change, impacts on natural capital, pollution, and biodiversity.

TransRe and TRE recognise the risks associated with climate change (physical, transition, and liability) and these are considered as part of the ORSA process.

TransRe and TRE take the risks associated with climate change seriously, and TransRe's global catastrophe modelling team has considered the long term effects of climate change on our catastrophe models. We believe the financial risks associated with climate change can be appropriately mitigated against with the correct understanding of the longer-term risks associated with our underwriting and investment portfolios and with the industries which impact climate change.

We have employees within TransRe, from a diverse range of disciplines, investigating and assessing the impact of climate change across a range of areas including our underwriting and investment portfolios, as well as considering the impact on the day to day running of the business.

In light of the European Commission's recent proposals within the Omnibus package, TRE is carefully monitoring the regulatory developments around Sustainability. TRE will ensure compliance with the related regulatory requirements, if and as applicable.



C.7 Any other information

Risk Sensitivity

TRE's SCR coverage ratio as at 31 December 2024 is 219% (2023: 224%). The below table shows the absolute change in the coverage ratio under several hypothetical scenarios. The scenarios below have not been adjusted to take into account potential future management actions to mitigate their effects.

Figure 18: SCR coverage ratio sensitivity analysis

Scenario	Change to coverage ratio
Exchange rates: +10%	3%
Exchange rates: -10%	-3%
Interest rates: +1%	5%
Interest rates: -1%	-4%
Catastrophe loss: US\$ 100m net of all reinsurance	-106%

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



D. Valuation for solvency purposes

This section of the report provides a description of the material bases, methods and assumptions used to value assets, technical provisions and other liabilities under CAA Rules. It also includes descriptions of how the bases, methods and assumptions under the CAA Rules differ from those applied for valuation purposes in the financial statements.

TRE's Solvency II assets and liabilities are presented on an economic basis consistent with the "fair value" accounting concept. Valuations represent amounts for which assets and liabilities could be exchanged between knowledgeable and willing parties in an arm's length transaction.

TRE prepares its statutory financial statements in accordance with Lux GAAP – statutory valuation is used where consistent with the economic basis. Assets and liabilities measured at cost or amortised cost in TRE's financial statements have been revalued to economic value. Solvency II also requires specific valuation approaches for some assets and liabilities; these have been followed.

TRE exercises judgement in selecting each of its accounting policies. The Luxembourg law on "Accounts of insurance and reinsurance undertakings" from 8 December 1994 (as amended from time to time) requires management to select suitable accounting policies, apply them consistently and make judgements and estimates that are reasonable and prudent when preparing the financial statements, and TRE 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, TRE's financial position, results of operations and cash flows could be materially affected.

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

D.1 Assets

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

Figure 19: Summary assets as at 31 December 2024

US\$'000s	Solvency II	Financial statements	Difference
Investments (including accrued interest)			
Government bonds	543,771	543,576	195
Collective Investments Undertakings	52,959	50,061	2,898
Reinsurance recoverable			
Non-life excluding health	361,464	476,466	-115,002
Health similar to non-life	2,107	2,634	-527
Deposits to cedants	43,896	43,896	-
Total receivables			
Reinsurance receivables	39,084	118,885	-79,800
Receivables (trade, not insurance)	1,094	1,094	-
Cash and cash equivalents	18,581	18,581	-
Any other assets, not elsewhere shown	652	652	-
Total assets	1,063,608	1,255,845	-192,237

The following sections provide further details on the specific valuation policies that TRE has applied to produce its Solvency II balance sheet, explaining the differences between these and the financial statement values set out within the table above.

Deferred tax

Deferred tax balances arise due to temporary difference between the valuation principles applied for the regulatory balance sheet, and the valuation principles applied for the statutory financial statements in accordance with Lux GAAP (which are the basis also for the tax purposes).



Deferred tax assets or liabilities are accounted for using the before described balance sheet liability method. The primary goal is to recognise the future tax consequences of these differences.

The identified temporary differences between the carrying amount of an asset or liability in the financial statements and its tax base will result in taxable or deductible amounts in future periods when the asset is recovered, or the liability is settled.

Based on these temporary differences, deferred tax liabilities or assets are calculated applying an average tax rate of 27% for all operations of TRE. Neither deferred tax assets nor liabilities are discounted.

A positive value is only ascribed to deferred tax assets to the extent that realising the related tax benefit through future taxable profits is likely. This assessment takes into account time limits that apply to the carry forward of unused tax losses or credits. TRE does not recognise any deferred tax assets.

Financial instruments

Recognition and derecognition of investments

A financial asset is initially recognised on the date TRE becomes committed to purchase the asset at its fair value plus directly related acquisition costs. A financial asset is de-recognised when TRE's rights to receive cash flows from the asset have expired or where the risks and rewards of ownership have been substantially transferred by TRE.

Fair value of investments

TRE 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.

Fair value sources and use of pricing vendors

TRE uses NEAM to provide pricing and fair values of its investments.

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

TRE's assessment of the significance of a particular input to the fair value measurement in its entirety requires judgement. In making the assessment, TRE considers factors specific to the asset. In certain cases, the inputs used to measure fair value may fall into different levels of the fair value hierarchy. In such cases, the investment's level in the fair value hierarchy is determined by the lowest level input that is significant to the measurement of the investment's fair value.

Impairment

TRE assesses the valuation of its investment portfolio on a regular basis. Impairments are considered if the market value is significantly below the cost value. An investment is further analysed based on qualitative principles e.g. rating downgrade of the issuer of the security, credit default, haircut on the principle, etc.

Valuation differences between the Solvency II and Lux GAAP balance sheets

TRE considers its policy on the fair value of investments, as described above, to be consistent with the hierarchy of valuation methods required for Solvency II for both assets and liabilities within the balance sheet. All investments in TRE's investment portfolio are carried at fair value.

On a statutory basis, fixed income securities are valued based on amortised costs, the investment fund is valued based on the lower of the initial cost value or current market value. The amortisation of discount and premium on fixed income securities is recognised under the net investment income.

Additionally, the value of investments in the Solvency II balance sheet includes interest accrued since the last coupon payment, while the statutory financial statements disclose accrued interest separately.



Reinsurance recoverable

For the differences in the valuation methodology between Lux GAAP and Solvency II see Section D.2.

(Re)insurance and intermediaries receivables and payables

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

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

Other receivables (trade not insurance)

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

Cash and cash equivalents

Cash and cash equivalents comprise cash in hand and on demand deposits with banks. Cash balances held in accounts with investment fund managers and custodians are treated as cash equivalents.

Foreign currency transactions and balances

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

Foreign currency transactions are accounted for at the exchange rates prevailing at the date of the transactions. For TRE gains and losses resulting from the settlement of such transactions, and from the translation of monetary assets and liabilities denominated in non-US\$ currencies, are recognised in the income statement.

Leasing arrangements

TRE has no operating or financial leasing arrangements at reporting date.

D.2 Technical provisions

TRE 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 ("BEL") are the probability weighted average of future cash flows, discounted back to the relevant balance sheet date using risk free discount rates. These include all the relevant cash inflows and outflows to meet the requirements of the policies TRE is obligated to at the valuation date.
- The risk margin represents an allowance for the cost of capital necessary to support the policies TRE 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.

TRE calculates its technical provisions using the sum of the best estimate liability and risk margin, therefore:

$$\text{Technical Provisions} = \text{Best Estimate Liability} + \text{Risk Margin}$$



Segmentation into lines of business

BELs are segmented into twelve lines of business for non-life insurance obligations (with additional segmentation for non-proportional reinsurance accepted), 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) and one line of business for life reinsurance. TRE has no non-life nor life annuities and therefore there is no line of business disclosed for this category.

Lines of business for financial reporting purposes under Lux GAAP are mapped to Solvency II lines of business according to “sub-department” classification in TRE’s technical accounting system. The mapping is subject to allocations for certain sub-departments, which include private and commercial motor and multi-class lines of business. Except for these allocations, the sub-departments and Solvency II lines of business are in many-to-one correspondence.

Figure 20: Technical provisions by Solvency II line of business as at 31 December 2024

Solvency II line of business (US\$'000s)	Gross Best Estimate	Recoverable	Net	Risk Margin	Net TPs
Medical expenses insurance	676	-458	219	25	244
Income protection insurance	373	-186	188	21	209
Motor vehicle liability insurance	9,319	-3,401	5,918	673	6,591
Other motor insurance	3,797	-2,245	1,552	177	1,729
Marine, aviation and transport insurance	25,696	-14,594	11,102	1,263	12,365
Fire and other damage to property insurance	104,868	-72,614	32,254	3,670	35,924
General liability insurance	131,879	-68,819	63,061	7,175	70,235
Credit and suretyship insurance	20,149	-11,038	9,112	1,037	10,149
Non-proportional health reinsurance	4,761	-1,463	3,298	375	3,673
Non-proportional casualty reinsurance	87,413	-29,383	58,030	6,602	64,632
Non-proportional marine, aviation and transport reinsurance	9,868	-6,305	3,564	405	3,969
Non-proportional property reinsurance	203,952	-153,067	50,886	5,790	56,675
Life reinsurance	6,916	-	6,916	787	7,703
Total	609,669	-363,570	246,098	28,000	274,098

Technical provisions basis, methodologies and key assumptions

Basis

TRE uses the Lux GAAP financial reporting framework as the starting basis for determining the Solvency II technical provisions.

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



Figure 21: Lux GAAP to Solvency II reconciliation as at 31 December 2024

Solvency II line of business (US\$'000s)	Assumed	Ceded	Net
Lux GAAP Technical Provisions	744,135	479,100	265,036
Reserving margins	-28,389	-22,213	-6,176
Future premiums & acquisition costs	-79,800	-56,570	-23,230
Future other expenses	22,116	-	22,116
Legally obliged unincpected business	5,830	-629	6,459
Discounting	-54,224	-35,708	-18,516
Counterparty default	-	-409	409
Solvency II Best Estimate	609,669	363,570	246,098
Risk margin			28,000
Solvency II Technical Provisions	609,669	363,570	274,098

Figure 22: Lux GAAP to SII reconciliation of gross technical provisions for top 5 Solvency II lines of business as at 31 December 2024

Solvency II Line of Business Gross (US\$'000s)	Fire and other damage to property (Prop)	Property (Non Prop)	General liability (Prop)	Credit and suretyship insurance (Prop)	Life reinsurance	Other*	Total
Lux GAAP technical provisions	139,126	246,526	166,825	25,732	1,974	163,953	744,135
Reserving margins	-11,541	-6,078	-8,279	-3,487	4,857	-3,860	-28,389
Future premiums & acquisition costs	-29,127	-23,631	-16,488	-2,317	-	-8,238	-79,800
Future other expenses	7,154	4,861	5,581	1,084	85	3,350	22,116
Legally obliged unincpected business	6,392	-10,811	7,621	757	-	1,871	5,830
Discounting	7,137	-6,915	-23,381	-1,619	-	-15,173	-54,224
Counterparty default	-	-	-	-	-	-	-
Solvency II best estimate	104,868	203,952	131,879	20,149	6,916	141,904	609,669
Risk margin	3,670	5,790	7,175	1,037	787	9,542	28,000
Solvency II technical provisions	108,538	209,742	139,054	21,186	7,703	151,446	637,669

*Included within "other" are accepted non-proportional casualty which has gross Lux GAAP technical provisions of US\$ 100,337k (SII best estimate: US\$ 87,413k), marine, aviation and transport (proportional and non-proportional) of US\$ 42,871k (SII best estimate: US\$ 35,564k) and motor (motor vehicle liability and other classes) of US\$ 13,673k (SII best estimate: US\$ 13,116k).



Figure 23: Lux GAAP to SII reconciliation of net technical provisions for top 5 Solvency II lines of business as at 31 December 2024

Solvency II Line of Business Gross (US\$'000s)	Fire and other damage to property (Prop)	Property (Non Prop)	General liability (Prop)	Credit and suretyship insurance (Prop)	Life reinsurance	Other*	Total
Lux GAAP technical provisions	37,333	54,281	70,302	10,119	1,974	91,027	265,036
Reserving margins	-4,572	-1,127	-2,897	-1,100	4,857	-1,338	-6,176
Future premiums & acquisition costs	-8,633	-5,783	-4,930	-739	-	-3,146	-23,230
Future other expenses	7,154	4,861	5,581	1,084	85	3,350	22,116
Legally obliged unincurred business	2,807	-4	2,432	379	-	846	6,459
Discounting	-1,862	-1,713	-7,435	-632	-	-6,874	-18,516
Counterparty default	27	370	7	1	-	1	409
Solvency II best estimate	32,354	50,886	63,061	9,112	6,916	83,870	246,098
Risk margin	3,670	5,790	7,175	1,037	787	9,542	28,000
Solvency II technical provisions	35,924	56,675	70,235	10,149	7,703	93,412	274,098

BEL calculation method

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

Claims provision

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

TRE 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. TRE considers the expected incidence and cost of future claims, including infrequent, high severity claims and latent claims. The best estimate premium provision is calculated as:

- the best estimate of IBNR claims based on unearned premiums;
- plus the best estimate of unpaid non-contingent acquisition costs that have not been incurred;
- plus the best estimate of unpaid contingent acquisition costs based on unearned premiums;



- plus the best estimate of unpaid other expenses based on unearned premiums;
- less the best estimate of unpaid premiums that have not been earned.

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

Methodologies for loss reserves and IBNR

The methods employed to estimate loss reserves include the following:

Paid loss development, incurred loss development methods

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

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

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

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

- Loss development factors ("LDF") – these are used to arrive at the ultimate amount of losses incurred for each underwriting year based on reported loss information. These factors, which are calculated initially based on historical loss development patterns (i.e. the emergence of reported losses over time relative to the ultimate losses to be paid), may then be adjusted for current trends.
- Loss trend factors ("LTF") – these typically focus on any underlying trends which may progress through the projection into the future, such as provisions for inflation, including social inflation (awards by judges and juries which increase progressively in size at a rate exceeding that of general inflation) and trends in court interpretations of coverage.
- ELRs – 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 TRE uses (described above) are employed to estimate ultimate losses, including the delay between the claim being reported to the insurer, and the insurer reporting the claim to TRE. 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 TRE 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 using 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 Lux GAAP 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 Lux GAAP financial statements of TRE 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. TRE 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 Lux GAAP, unpaid premiums and acquisition costs are shown separately on the balance sheet at the accounting date as insurance and reinsurance receivables or 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 Lux GAAP, unpaid other income or expenses are shown separately on the balance sheet at the accounting date as other receivables / payables, or as accrued income / expenses as appropriate.

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

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

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

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

At any given time, TRE may have contracts that have been written but have not yet accepted (i.e. the cover has not yet commenced). For example, a contract that was bound on 27 December of the prior year which accepts on 1 January of the current year would be included within legally obliged unaccepted business at 31 December of the prior year.

Under Lux GAAP, the valuation of insurance reserves does not include legally obliged unaccepted contracts.

Under Solvency II, cashflows arising from these contracts are included within the premium provision. The calculations of technical provisions relating to legally obliged unaccepted 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

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



TRE has more than 45 years of credible claims experience, which is used to derive assumptions. This historical claims experience contains many significant natural and man-made catastrophe losses.

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

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

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

Discounting

Technical provisions are not discounted under Lux GAAP.

Under Solvency II, TRE 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 TRE. 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

TRE does not adjust the technical provisions calculated under Lux GAAP for potential counterparty default.

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

$$\text{Probability of default} \quad \times \quad \text{Loss given default}$$

These are defined as follows:

- Probability of default – cashflows 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 AM 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%. TRE 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 inception 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, TRE 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 TRE to denote a technical provision figure net of reinsurance.

Existing reinsurance

TRE employs both proportional and non-proportional retrocession.

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

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

Uncertainty within the technical provisions

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

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

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

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

TRE continually assesses the reserve adequacy of IBNR considering 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 TRE'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;
- sustainability;
- underlying policy pricing;
- terms and conditions; and
- claims handling.

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

The uncertainty inherent in estimating IBNR relating to unexpired periods of coverage is exacerbated by the application of the same underlying valuation techniques to the calculation of technical provisions in respect of unexpired periods of coverage, including obligations arising from legally obliged unincurred business.

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

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



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 TRE.

Sensitivity analysis for technical provisions

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

Figure 24: Technical provision sensitivities as at 31 December 2024

	Exchange Rates		Interest Rates		Reserving Assumptions*	
Key assumptions	10%	-10%	+100 bps	-100 bps	5%	-5%
Technical provisions	9%	-9%	-4%	3%	10%	4%

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

Exclusions from technical provisions

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

Matching adjustment

TRE 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 TRE in the calculation of technical provisions.

Transitional measures to Technical Provisions

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

Transitional risk-free interest rate-term structure

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

Changes in assumptions since prior period

There were no changes made to the recognition and valuation bases during the reporting period. Valuation assumptions, such as exchange rates and interest rates, however, are updated each quarter to reflect prevailing economic conditions.



D.3 Other liabilities

The material classes of other liabilities shown on TRE's Solvency II balance sheet, their Solvency II values and corresponding values shown in the 2024 financial statements are summarised in the table below.

Figure 25: Other liabilities – Lux GAAP & Solvency II reconciliation as at 31 December 2024

(US\$'000s)	Solvency II	Financial Statements	Difference
Deposits from reinsurers	29,035	29,035	-
Reinsurance payables	45,767	102,337	-56,570
Payables (trade, not insurance)	1,706	1,706	-
Any other liabilities, not elsewhere shown	-	7,281	-7,281
Total other liabilities	76,508	140,359	-63,851
Technical provisions	637,669	749,507	-111,838
Total liabilities	714,177	889,866	-175,689

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

- reinsurance payables include net premium accruals, but for Solvency II these accruals are subsumed within technical provisions;
- any other liabilities 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.

TRE has no financial or operating lease arrangements.

(Re)insurance and intermediaries payable

Please see Section D.1 (Re)insurance and intermediaries receivable.

Payables (trade not insurance)

Please see Section D.1 Other receivables (trade not insurance).

Any other liabilities, not shown elsewhere

The reduction in any other liabilities under Solvency II relates to accrued insurance related expenses not yet due, which have been moved to technical provisions (see Figure 20).

Provisions

At 31 December 2024, TRE held no provisions in its Financial Statements or on its Solvency II balance sheet.

Contingent liabilities

TRE does not consider any contingent liabilities exist as at 31 December 2024.

Employee benefits

TRE does not consider any employee benefit liabilities exist as at 31 December 2024.

Aggregation of liabilities

TRE 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

TRE does not use any alternative methods to value its assets and liabilities

**D.5 Any other information**

TRE 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

TRE's own funds comprise ordinary paid-up share capital and the share premium account which are classified as Tier 1 own funds, as well as a reconciliation reserve of US\$ 188.4 million which is classified as Tier 1 own funds. As at 31 December 2024, the available own funds of TRE were as follows:

Figure 26: Eligible own funds by tier

Tier	Instruments	At 31 December (US\$'000s)	
		2024	2023
Tier 1	Ordinary share capital	27,000	27,000
	Share premium account	132,959	132,959
	Reconciliation reserve	188,441	185,102
Tier 2	Not applicable	-	-
Total own funds to cover MCR		348,401	345,064
Tier 3	Deferred tax assets	-	4,257
Total own funds to cover SCR		348,401	349,319

As at 31 December 2024, TRE had no ancillary own funds.

The reconciliation reserve of US\$ 188.4 million is calculated below and is dependent on the level of excess assets over liabilities, the values of Ordinary share capital and share premium account. The reconciliation reserve is not considered to be significantly volatile; however the potential for volatility does exist and is discussed in the sensitivity analyses provided in sections C.7 and D.2 of this report.

Figure 27: Reconciliation Reserve

	At 31 December (US\$'000s)	
	2024	2023
Excess of assets over liabilities	349,432	350,887
Less:		
Ordinary share capital	-27,000	-27,000
Share premium account	-132,959	-132,959
Deferred tax assets	-	-4,257
Restricted Own Fund items	-1,031	-1,568
Reconciliation reserve	188,441	185,102

Every quarter TRE reviews its own funds against the MCR and SCR. The results are presented to the Executive Committee and the Risk & Compliance Committee as part of the ongoing review process. Included in the analysis is a forward-looking review that takes into consideration TRE's three-year planning horizon. TRE's own fund remained on the prior year's level as TRE the benefits from the underwriting and investment gains were off-set by currency fluctuation and the dividend payment.

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

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

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

- the ability to call on additional capital under the TRC Capital Support Agreement;
- revisions to the TRE business plan, such as changes to the composition of business; and
- revision to TRE's capital target in the short term.



As set out in TRE's Articles of Association, the Board has 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 TRE 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 TRE's Financial Statements and the excess of assets over liabilities as calculated for solvency purposes:

Figure 28: Lux GAAP to Solvency II Reconciliation as at 31 December 2024

	(US\$'000s)	Description
Lux GAAP net assets	365,964	
Change in:		
Investments	3,093	Adjustment on valuation of investments
(Re)insurance receivables and other receivables	-79,800	Estimated premium and contingent commission reserve not yet due moved to TPs
(Re)insurance recoverable	-115,529	Adjustment from reinsurer's share of statutory insurance reserves to Solvency II TPs
(Re)insurance payables	56,570	Estimated premium and contingent commission reserve not yet due moved to TPs
Any other liabilities, not elsewhere shown	7,281	Accrued non-insurance related expenses not yet due moved to TP's
Technical provisions	139,838	Adjustment from statutory insurance reserves to Solvency II TPs
Deferred tax assets / liabilities	-	Pre-tax change in net assets
Risk margin	-28,000	Inclusion of Solvency II risk margin
Solvency II excess of assets over liabilities	349,432	

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

Please see Section D.1 for further information on the valuation of assets under Solvency II, Section D.2 for a reconciliation between the Lux GAAP and Solvency II technical provisions and Section D.3 for other liabilities.

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

TRE has not applied to use any transitional measures for the calculation of own funds.

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

TRE 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

TRE uses the Solvency II Standard Formula ("SF") to calculate its SCR.

Figure 29: Solvency II capital requirements as at 31 December

	2024 (US\$'000s)	2023 (US\$'000s)
Eligible Own Funds to cover SCR	348,401	349,319
Eligible Own Funds to cover MCR	348,401	345,061
Minimum Capital Requirement	41,543	42,077
Basic Solvency Capital Requirement	141,098	140,112
Operational risk	18,114	15,554
Solvency Capital Requirement	159,211	155,666
Market risk	43,626	37,562
Counterparty default risk	25,804	31,593
Life underwriting risk	10,748	10,689
Health underwriting risk	1,954	3,178
Non-life underwriting risk	105,700	103,819
less Diversification	-46,736	-46,729
Basic Solvency Capital Requirement:	141,098	140,112
Non-life catastrophe risk	31,992	27,475
Non-life premium & reserve risk	93,001	93,383
Non-life lapse risk	3,494	4,499
less diversification	-22,787	-21,538
Non-life underwriting risk:	105,700	103,819

TRE's SCR amounted to US\$ 159.2 million as of 31 December 2024 (US\$ 155.7 million as of 31 December 2023).

The increase in the SCR is driven by the following factors:

- Market risk: update of calculation of equity risk and higher exposure; and
- Operational risk: increase is due to higher gross exposure.

TRE 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 TRE are listed below:

- Article 107: simplified calculation of the risk mitigating effect for reinsurance arrangements or securitisation; and
- Article 111: simplified calculation of the risk mitigating effect.

These simplifications relate to the counterparty default risk module.

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

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



Calculation of the MCR

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

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

TRE's linear MCR falls below the SCR corridor of between 25% and 45% of the SCR. Accordingly TRE's MCR has been adjusted upwards to equal 25% of its SCR, as required by Solvency II.

There have been no changes to TRE'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

TRE 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

TRE does not use an internal model.

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 TRE.

E.6 Any other information

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



Appendix 1: Abbreviations used in this report

AI	Artificial intelligence
AM Best	A.M. Best Company, Inc. and/or its affiliates
Alleghany	Alleghany Corporation
BEL	Best Estimate Liabilities
Berkshire Hathaway	Berkshire Hathaway Inc.
BF	Bornhuetter-Ferguson
bps	Basis points (0.01%)
CAA	Commissariat aux Assurances
CCO	Chief Compliance Officer (New York)
CEO	Chief Executive Officer
CFO	Chief Financial Officer
Covid-19	2019 Novel Coronavirus
CRMC	Corporate Risk Management Committee
EIOPA	European Insurance and Occupational Pensions Authority
ELR	Expected Loss Ratio
ENID	Events not in Data
EPIFP	Expected Profit included in Future Premiums
ERM	Enterprise Risk Management
ESG	Environmental, Social & Governance
EU	European Union
Fitch	Fitch Ratings, Inc., Fitch Ratings, Ltd. and its subsidiaries
GRM	Global Risk Management
IBNER	Incurred but not Enough Reported
IBNR	Incurred but not Reported
INED	Independent Non-Executive Director
IT	Information Technology
KYC	Know Your Counterparty
LAE	Loss Adjustment Expenses
LDF	Loss Development Factors
Lux GAAP	Generally Accepted Accounting Principles in Luxembourg
LTF	Loss Trend Factors
MCR	Minimum Capital Requirement
MENA	Middle East and North Africa region
Moody's	Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their affiliates
NEAM	New England Asset Management Limited
NED	Non-Executive Director
ORSA	Own Risk and Solvency Assessment
QRT	Quantitative Reporting Template
S&P	Standard & Poor's Financial Services LLC and/or its affiliates
S&R	Sustainability & Resilience
SCR	Solvency Capital Requirement
SF	Standard Formula
SFCR	Solvency and Financial Condition Report
SII	Solvency II Directive
SPV	Special Purpose Vehicles



TPs	Technical Provisions
TransRe	Collective term for TRH, its subsidiaries, branches and representatives
TRC	Transatlantic Reinsurance Company
TRC Capital Support Agreement	The capital support guarantee agreement described in Section B1
TRC Quota Share	The quota share reinsurance agreement described in Section B1
TRC Whole Account XL	The whole account excess of loss reinsurance agreement described in Section B1
TRE	TransRe Europe S.A.
TRH	Transatlantic Holdings, Inc.
US or USA	United States of America
US\$	United States of America Dollar



Appendix 2: Public Quantitative Reporting Templates (QRTs)

Templates		
S.02.01.02	Balance Sheet	Relevant element
S.05.01.02	Premiums, claims and expenses by line of business – Non-life	Other information
S.05.01.02	Premiums, claims and expenses by line of business – Life	Other information
S.05.02.04	Premiums, claims and expenses by country – Non-life	Other information
S.05.02.04	Premiums, claims and expenses by country – Life	Other information
S.12.01.02	Life and Health SLT Technical Provisions	Relevant element
S.17.01.02	Non-Life technical Provisions	Relevant element
S.19.01.21	Non-Life insurance claims	Other information
S.23.01.01	Own funds	Relevant element
S.25.02.21	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	0
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)	596,731
R0080	<i>Property (other than for own use)</i>	0
R0090	<i>Holdings in related undertakings, including participations</i>	0
R0100	<i>Equities</i>	0
R0110	<i>Equities - listed</i>	0
R0120	<i>Equities - unlisted</i>	0
R0130	<i>Bonds</i>	543,771
R0140	<i>Government Bonds</i>	543,771
R0150	<i>Corporate Bonds</i>	0
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	0
R0180	<i>Collective Investments Undertakings</i>	52,959
R0190	<i>Derivatives</i>	0
R0200	<i>Deposits other than cash equivalents</i>	0
R0210	<i>Other investments</i>	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	0
R0240	<i>Loans on policies</i>	0
R0250	<i>Loans and mortgages to individuals</i>	0
R0260	<i>Other loans and mortgages</i>	0
R0270	Reinsurance recoverables from:	363,570
R0280	<i>Non-life and health similar to non-life</i>	363,570
R0290	<i>Non-life excluding health</i>	361,464
R0300	<i>Health similar to non-life</i>	2,107
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	0
R0320	<i>Health similar to life</i>	0
R0330	<i>Life excluding health and index-linked and unit-linked</i>	0
R0340	<i>Life index-linked and unit-linked</i>	0
R0350	Deposits to cedants	43,896
R0360	Insurance and intermediaries receivables	0
R0370	Reinsurance receivables	39,084
R0380	Receivables (trade, not insurance)	1,094
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	18,581
R0420	Any other assets, not elsewhere shown	652
R0500	Total assets	1,063,608

		Solvency II value
Liabilities		C0010
R0510	Technical provisions - non-life	629,966
R0520	<i>Technical provisions - non-life (excluding health)</i>	623,734
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	596,942
R0550	<i>Risk margin</i>	26,792
R0560	<i>Technical provisions - health (similar to non-life)</i>	6,232
R0570	<i>TP calculated as a whole</i>	0
R0580	<i>Best Estimate</i>	5,811
R0590	<i>Risk margin</i>	421
R0600	Technical provisions - life (excluding index-linked and unit-linked)	7,703
R0610	<i>Technical provisions - health (similar to life)</i>	0
R0620	<i>TP calculated as a whole</i>	0
R0630	<i>Best Estimate</i>	0
R0640	<i>Risk margin</i>	0
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	7,703
R0660	<i>TP calculated as a whole</i>	0
R0670	<i>Best Estimate</i>	6,916
R0680	<i>Risk margin</i>	787
R0690	Technical provisions - index-linked and unit-linked	0
R0700	<i>TP calculated as a whole</i>	0
R0710	<i>Best Estimate</i>	0
R0720	<i>Risk margin</i>	0
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	0
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	29,035
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	45,767
R0840	Payables (trade, not insurance)	1,706
R0850	Subordinated liabilities	0
R0860	<i>Subordinated liabilities not in BOF</i>	0
R0870	<i>Subordinated liabilities in BOF</i>	0
R0880	Any other liabilities, not elsewhere shown	0
R0900	Total liabilities	714,177
R1000	Excess of assets over liabilities	349,432

Premiums, claims and expenses by line of business

[illegible]

S.05.01.02

Premiums, claims and expenses by line of business

Life

Line of Business for: life insurance obligations						Life reinsurance obligations		Total
Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	
C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Premiums written								
R1410	Gross						13,660	13,660
R1420	Reinsurers' share						0	0
R1500	Net						13,660	13,660
Premiums earned								
R1510	Gross						13,927	13,927
R1520	Reinsurers' share						0	0
R1600	Net						13,927	13,927
Claims incurred								
R1610	Gross						11,755	11,755
R1620	Reinsurers' share						0	0
R1700	Net						11,755	11,755
R1900	Expenses incurred						1,065	1,065
R2510	Balance - other technical expenses/income							-321
R2600	Total technical expenses							744
R2700	Total amount of surrenders						0	0

S.05.02.04

Premiums, claims and expenses by country

Non-life

	C0010	C0020	C0030	C0040	C0050	C0060	C0070
	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country	
Home Country	DE	CH	FR	IT	AE		
	C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums written							
R0110 Gross - Direct Business	0	0	0	0	0	0	0
R0120 Gross - Proportional reinsurance accepted	0	123,798	43,687	4,186	6,973	8,428	187,072
R0130 Gross - Non-proportional reinsurance accepted	234	37,809	9,535	24,595	12,355	3,597	88,126
R0140 Reinsurers' share	187	128,298	42,044	23,256	15,371	9,259	218,416
R0200 Net	47	33,310	11,178	5,525	3,956	2,766	56,782
Premiums earned							
R0210 Gross - Direct Business	0	0	0	0	0	0	0
R0220 Gross - Proportional reinsurance accepted	94	110,077	45,185	4,304	6,308	8,601	174,568
R0230 Gross - Non-proportional reinsurance accepted	234	36,913	8,660	23,001	12,030	3,374	84,212
R0240 Reinsurers' share	243	115,973	42,125	22,024	14,528	8,996	203,890
R0300 Net	85	31,016	11,720	5,281	3,810	2,978	54,890
Claims incurred							
R0310 Gross - Direct Business	0	0	0	0	0	0	0
R0320 Gross - Proportional reinsurance accepted	3,209	71,704	27,342	3,541	2,415	6,434	114,646
R0330 Gross - Non-proportional reinsurance accepted	78	58,301	1,631	1,644	14,282	13,310	89,246
R0340 Reinsurers' share	2,065	102,392	23,748	5,308	14,103	15,801	163,418
R0400 Net	1,222	27,614	5,225	-124	2,594	3,943	40,474
R0550 Expenses incurred	-401	9,533	4,210	1,393	559	479	15,774
R1210 Balance - other technical expenses/income							0
R1300 Total technical expenses							15,774

S.05.02.04

Premiums, claims and expenses by country

Life

		C0150	C0160	C0170	C0180	C0190	C0200	C0210
R1400	Home Country	Top 5 countries (by amount of gross premiums written) - life obligations					Total Top 5 and home country	
	GB							
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
Premiums written								
R1410	Gross	0	12,557					12,557
R1420	Reinsurers' share	0	0					0
R1500	Net	0	12,557					12,557
Premiums earned								
R1510	Gross	0	12,557					12,557
R1520	Reinsurers' share	0	0					0
R1600	Net	0	12,557					12,557
Claims incurred								
R1610	Gross	0	11,619					11,619
R1620	Reinsurers' share	0	0					0
R1700	Net	0	11,619					11,619
R1900	Expenses incurred	0	859					859
R2510	Balance - other technical expenses/income							0
R2600	Total technical expenses							859
R2700	Total amount of surrenders	0	0					0

S.12.01.02

Life and Health SLT Technical Provisions

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

5.17.01.02

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
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																	
Technical provisions calculated as a sum of BE and RM																		
Best estimate																		
Premium provisions																		
R0060	Gross	59	22	0	948	207	1,174	8,762	2,264	1,853	0	0	0	-185	156	-479	-15,440	-659
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	29	15	0	727	156	983	6,243	2,105	1,473	0	0	0	-154	-62	-504	-15,561	-4,549
R0150	Net Best Estimate of Premium Provisions	29	7	0	221	52	191	2,518	159	380	0	0	0	-31	218	25	121	3,890
Claims provisions																		
R0160	Gross	618	352	0	8,371	3,589	24,522	96,106	129,615	18,296	0	0	0	4,946	87,257	10,347	219,392	603,412
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	428	170	0	2,674	2,089	13,611	66,370	66,714	9,565	0	0	0	1,617	29,445	6,808	168,628	368,120
R0250	Net Best Estimate of Claims Provisions	190	181	0	5,697	1,501	10,911	29,736	62,901	8,731	0	0	0	3,329	57,812	3,539	50,764	235,292
Total best estimate - gross																		
R0260	Total best estimate - gross	676	373	0	9,319	3,797	25,696	104,868	131,879	20,149	0	0	0	4,761	87,413	9,868	203,952	602,753
R0270	Total best estimate - net	219	188	0	5,918	1,552	11,102	32,254	63,061	9,112	0	0	0	3,298	58,030	3,564	50,886	239,182
Risk margin																		
R0280	Risk margin	25	21	0	673	177	1,263	3,670	7,175	1,037	0	0	0	375	6,602	405	5,790	27,213
Technical provisions - total																		
R0320	Technical provisions - total	701	395	0	9,992	3,973	26,959	108,538	139,054	21,186	0	0	0	5,136	94,015	10,274	209,742	629,966
R0330	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	458	186	0	3,401	2,245	14,594	72,614	68,819	11,038	0	0	0	1,463	29,383	6,305	153,067	363,570
R0340	Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	244	209	0	6,591	1,729	12,365	35,924	70,235	10,149	0	0	0	3,673	64,632	3,969	56,675	266,396

Non-Life insurance claims

Total Non-life business

Accident year / underwriting year

Underwriting year

(absolute amount)

	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180	
Year	Development year											In Current year	Sum of years (cumulative)	
	0	1	2	3	4	5	6	7	8	9	10 & +	year		
R0100	Prior											10,079	10,079	10,079
R0160	-9	0	0	0	0	1,001	1,383	1,243	2,103	523	412	412	6,665	
R0170	-8	0	0	0	1,350	2,940	2,154	3,559	680	484		484	11,168	
R0180	-7	0	0	4,962	8,411	4,031	1,919	1,840	1,529			1,529	22,691	
R0190	-6	0	120,332	68,298	18,756	6,016	1,167	1,995				1,995	216,565	
R0200	-5	25,150	248,193	89,213	31,816	16,364	2,270					2,270	413,005	
R0210	-4	3,150	31,217	31,803	41,059	5,951						5,951	113,178	
R0220	-3	28,750	103,411	71,087	18,236							18,236	221,484	
R0230	-2	-3,541	34,075	32,965								32,965	63,499	
R0240	-1	3,884	37,270									37,270	41,154	
R0250	0	-892										-892	-892	
R0260											Total	110,299	1,118,596	

(absolute amount)

[illegible]

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

R0010	Ordinary share capital (gross of own shares)
R0030	Share premium account related to ordinary share capital
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings
R0050	Subordinated mutual member accounts
R0070	Surplus funds
R0090	Preference shares
R0110	Share premium account related to preference shares
R0130	Reconciliation reserve
R0140	Subordinated liabilities
R0160	An amount equal to the value of net deferred tax assets
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above
R0220	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds
R0230	Deductions for participations in financial and credit institutions
R0290	Total basic own funds after deductions
	Ancillary own funds
R0300	Unpaid and uncalled ordinary share capital callable on demand
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand
R0320	Unpaid and uncalled preference shares callable on demand
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC
R0390	Other ancillary own funds
R0400	Total ancillary own funds
	Available and eligible own funds
R0500	Total available own funds to meet the SCR
R0510	Total available own funds to meet the MCR
R0540	Total eligible own funds to meet the SCR
R0550	Total eligible own funds to meet the MCR
R0580	SCR
R0600	MCR
R0620	Ratio of Eligible own funds to SCR
R0640	Ratio of Eligible own funds to MCR
	Reconciliation reserve
R0700	Excess of assets over liabilities
R0710	Own shares (held directly and indirectly)
R0720	Foreseeable dividends, distributions and charges
R0730	Other basic own fund items
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds
R0760	Reconciliation reserve
	Expected profits
R0770	Expected profits included in future premiums (EPIFP) - Life business
R0780	Expected profits included in future premiums (EPIFP) - Non- life business
R0790	Total Expected profits included in future premiums (EPIFP)

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
27,000	27,000		0	
132,959	132,959		0	
0	0		0	
0		0	0	0
0	0			
0		0	0	0
0		0	0	0
188,441	188,441			
0		0	0	0
0				0
0	0	0	0	0
0				
0				
348,401	348,401	0	0	0
0				
0				
0				
0				
0				
0				
0				
0				
348,401	348,401	0	0	0
348,401	348,401	0	0	0
348,401	348,401	0	0	0
159,211				
41,543				
219%				
839%				
C0060				
349,432				
0				
159,959				
1,031				
188,441				
0				
50,517				
50,517				

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

Gross solvency capital requirement		USP	Simplifications
C0110		C0090	C0120
R0010	Market risk	43,626	
R0020	Counterparty default risk	25,804	
R0030	Life underwriting risk	10,748	
R0040	Health underwriting risk	1,954	
R0050	Non-life underwriting risk	105,700	
R0060	Diversification	-46,736	
R0070		Intangible asset risk	0
R0100		Basic Solvency Capital Requirement	141,098
Calculation of Solvency Capital Requirement			
R0130	Operational risk	18,114	
R0140	Loss-absorbing capacity of technical provisions	0	
R0150	Loss-absorbing capacity of deferred taxes		
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC		
R0200	Solvency Capital Requirement excluding capital add-on	159,211	
R0210	Capital add-ons already set	0	
R0211	of which, capital add-ons already set - Article 37 (1) Type a		
R0212	of which, capital add-ons already set - Article 37 (1) Type b		
R0213	of which, capital add-ons already set - Article 37 (1) Type c		
R0214	of which, capital add-ons already set - Article 37 (1) Type d		
R0220	Solvency capital requirement	159,211	
Other information on SCR			
R0400	Capital requirement for duration-based equity risk sub-module		
R0410	Total amount of Notional Solvency Capital Requirements for remaining part		
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds		
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios		
R0440	Diversification effects due to RFF nSCR aggregation for article 304		
Approach to tax rate		Yes/No	
R0590	Approach based on average tax rate	C0109	
Calculation of loss absorbing capacity of deferred taxes			
LAC DT		C0130	
R0640	LAC DT		
R0650	LAC DT justified by reversion of deferred tax liabilities		
R0660	LAC DT justified by reference to probable future taxable economic profit		
R0670	LAC DT justified by carry back, current year		
R0680	LAC DT justified by carry back, future years		
R0690	Maximum LAC DT		

USP Key

For life underwriting risk:
 1 - Increase in the amount of annuity benefits
 9 - None

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

For non-life underwriting risk:
 4 - Adjustment factor for non-proportional reinsurance
 6 - Standard deviation for non-life premium risk
 7 - Standard deviation for non-life gross premium risk
 8 - Standard deviation for non-life reserve risk
 9 - None

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

41,543

Net (of reinsurance /SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
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C0020

C0030

R0020	Medical expense insurance and proportional reinsurance
R0030	Income protection insurance and proportional reinsurance
R0040	Workers' compensation insurance and proportional reinsurance
R0050	Motor vehicle liability insurance and proportional reinsurance
R0060	Other motor insurance and proportional reinsurance
R0070	Marine, aviation and transport insurance and proportional reinsurance
R0080	Fire and other damage to property insurance and proportional reinsurance
R0090	General liability insurance and proportional reinsurance
R0100	Credit and suretyship insurance and proportional reinsurance
R0110	Legal expenses insurance and proportional reinsurance
R0120	Assistance and proportional reinsurance
R0130	Miscellaneous financial loss insurance and proportional reinsurance
R0140	Non-proportional health reinsurance
R0150	Non-proportional casualty reinsurance
R0160	Non-proportional marine, aviation and transport reinsurance
R0170	Non-proportional property reinsurance

219	0
188	36
0	0
5,918	772
1,552	384
11,102	1,272
32,254	24,036
63,061	13,148
9,112	3,820
0	0
0	0
0	0
3,298	133
58,030	3,111
3,564	1,307
50,886	13,260

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
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C0050

C0060

R0210	Obligations with profit participation - guaranteed benefits
R0220	Obligations with profit participation - future discretionary benefits
R0230	Index-linked and unit-linked insurance obligations
R0240	Other life (re)insurance and health (re)insurance obligations
R0250	Total capital at risk for all life (re)insurance obligations

Overall MCR calculation

C0070

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

41,543
159,211
71,645
39,803
41,543
4,244
41,543