



**UK DEFENCE CLUB**

The United Kingdom Freight Demurrage  
and Defence Insurance (Europe) Limited

# Solvency and Financial Condition Report

For the year ended 20 February 2025

UKDC  
IS MANAGED  
BY **THOMAS  
MILLER**

# The United Kingdom Freight Demurrage and Defence Insurance (Europe) Limited

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# The United Kingdom Freight Demurrage and Defence Insurance (Europe) Limited

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## Summary

The United Kingdom Freight Demurrage and Defence Insurance (Europe) Limited (the “Company” or “UKDE”) is a company incorporated in Cyprus. UKDE has obtained its insurance license from the Cyprus Ministry of Finance on 19<sup>th</sup> June 2020, and has started writing insurance business for EU policyholders in October 2020.

The purpose of this report is to satisfy the public disclosure requirements under the European Union Directive 2009/138 (Solvency II Directive) transposed into local legislation (Law on Insurance and Reinsurance Services and Other Related Business of 2016) including the EU Delegated Regulation 2015/35 supplementing the above Directive. This report covers the Business and Performance of UKDE, the System of Governance (including risk management), Risk Profile, Valuation for Solvency Purposes and Capital Management of the Company over the reporting period.

The ultimate Administrative Body that has the responsibility for all of these matters is the Company’s Board of Directors, with the help of various governance and control functions that it has put in place to monitor and manage the business.

The financial year runs to 20 February each year and the Company’s reports its results in Pounds Sterling.

For solvency purposes the Company uses the standard formula to calculate its Solvency Capital Requirement (“SCR”) and as an insurer of the marine legal expense risks, the Company’s insurance business is classified as legal expenses insurance for Solvency II purposes. All business is underwritten from Cyprus, however policyholders are dispersed internationally.

The Company applies the IFRS 17 – Insurance Contracts - reporting standard for accounting for the insurance policies. Under the IFRS 17 model, insurance contract liabilities are calculated as the present value of future insurance cash flows with the provision for a risk adjustment. The Company has in place systems and processes to report in accordance with the provisions of IFRS 17. The Company meets the criteria to apply the simplified model.

During the year under review, the Company made a profit after tax of UK£69,031 (2024: UK£162,656), as reported in its annual financial statements.

For solvency purposes the Company’s total own funds were UK£4,005,854 against an SCR of UK£ 1,565,908 resulting in coverage of 256% and eligible own funds of UK£4,005,854 against an Minimum Capital Requirement (“MCR”) of UK£2,261,331 resulting in coverage of 177%. Since the Company’s MCR is based on the absolute floor as set by EIOPA, the coverage is impacted by Sterling relative to Euro. Were it not for the absolute floor, the Company’s MCR would have been UK£391,477.

The Company complied with MCR and SCR throughout the year.

## **A. Business and Performance**

### **A.1. Business**

#### ***Corporate information***

##### **A.1.1 Name and legal form**

The United Kingdom Freight Demurrage and Defence Insurance (Europe) Ltd was incorporated in Cyprus on 4 July 2019 as a private limited liability company under the provisions of the Cyprus Companies Law, Cap. 113.

Its registered office is at 37 Theklas Lysioti, Gemini House, Flat 202, 3030 Limassol, Cyprus.

##### **A.1.2 Supervisory Authority details**

The Company is regulated by the Insurance Companies Control Service (ICCS), Ministry of Finance located at Michael Karaoli & Gregori Afxentiou, 1439, Nicosia, Cyprus.

Contact details:

Telephone number: +357 22 602990

Fax Number: +357 22 302938

E-mail: [insurance@mof.gov.cy](mailto:insurance@mof.gov.cy)

Website : <http://mof.gov.cy/en/directorates-units/insurance-companies-control-service>

##### **A.1.3 External auditor**

The Company's external auditors are:

ERNST & YOUNG CYPRUS LIMITED,

6 Stasinou Avenue Jean Nouvel Tower,

P.O.Box 21656

1511 Nicosia, Cyprus.

##### **A.1.4 Shareholders of qualifying holdings**

UKDE is 100% owned by The United Kingdom Freight Demurrage and Defence Association Limited ("UKFDD").

UKFDD was incorporated in the United Kingdom as a company limited by guarantee without share capital.

The authorised share capital of the Company consisted of forty thousand Sterling Pounds (UK£40.000) divided into forty thousand (40.000) ordinary shares of nominal value of one Sterling Pound (UK£1,00) each.

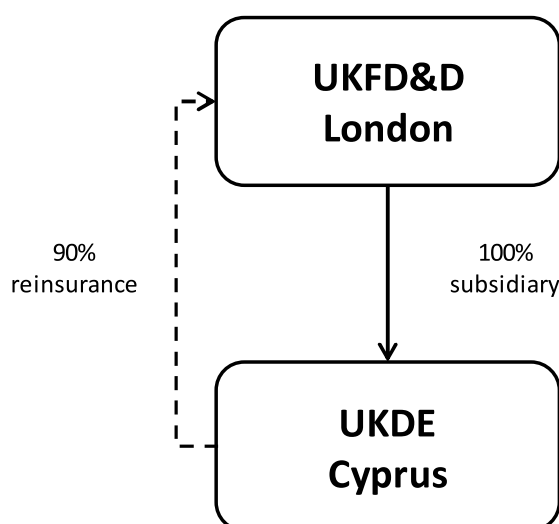
The issued share capital of the Company amounted to 20,000 shares of nominal value UK£1,00 each, issued at a premium of UK£49,00 per share.

## A. Business and Performance (continued)

### A.1. Business (continued)

#### A.1.5 Group structure

The Company is a wholly owned subsidiary of UKFDD. The Group writes legal cost insurance on behalf of its Members and policyholders. The Group operates as a single business, but has the following corporate structure:



#### Overview

The Company, a monoline insurer, carries on the business of insurance of its policyholders against legal costs and expenses as defined in the Rules of the Company. UKDE cedes approximately 90% of its business to UKFDD. The legal group in turn retrocedes 90 per cent of its business with The United Kingdom Defence Insurance Association (Isle of Man) Limited (“UKDIA”).

This report presents solely the results and Solvency II position of the Company.

For Solvency II purposes the Company’s business is classified as legal expense insurance.

The number of ships entered in the Company as at the year-end on 20 February 2025 was 506, compared to 510 during the year ended 20 February 2024. In terms of tonnage, the Company insured 27,827,110 tonnes during the year ended 20 February 2025 compared to 28,348,237 tonnes insured during the year ended 20 February 2024.

The Company’s business is underwritten in Cyprus, although policyholders are internationally dispersed. The Company offers insurance coverage for legal expenses incurred by its policyholders. Because the Company covers movable risk, geographical analysis of the location of risks is not feasible. For further information on the underwriting performance of the Company, by material geographical area, refer to Quantitative Reporting Template (“QRT”) s.05.02.01 which presents a geographical analysis by policyholder location and forms part of the Company’s annual regulatory reporting requirements.

The United Kingdom Freight Demurrage and Defence Insurance (Europe)  
Limited

## A. Business and Performance (continued)

### A.2. Underwriting Performance

For the year ended 20 February 2025, the Company produced an insurance service result of UK£219,640 as detailed further in the table below which is a summary of the Company's insurance account reported on in line with the International Financial Reporting Standards.

Summary of the insurance service result as at 20 February 2025:

	20/02/2025 UK£	20/02/2024 UK£
Insurance revenue	2,609,986	2,640,728
Insurance service expense	(938,515)	(1,160,910)
<b>Insurance service result before reinsurance contracts held</b>	<b>1,671,471</b>	<b>1,479,818</b>
Allocation of reinsurance premiums	(2,127,857)	(2,116,038)
Amounts recoverable from reinsurers for incurred claims	676,026	872,600
<b>Net expenses from reinsurance contracts held</b>	<b>(1,451,831)</b>	<b>(1,243,438)</b>
<b>Insurance service result</b>	<b>219,640</b>	<b>236,380</b>

### Risk mitigation

The Company writes policies with a maximum policy limit of \$15 million. The first \$1.0 million of claims is retained by the Company with any excess over the \$1.0 million retention and up to \$14.0 million were ceded on an excess of loss basis with the Parent company. Retained share of claims were further ceded to the Parent company on a 90% quota share basis. This arrangement is consistent with the Group policy.

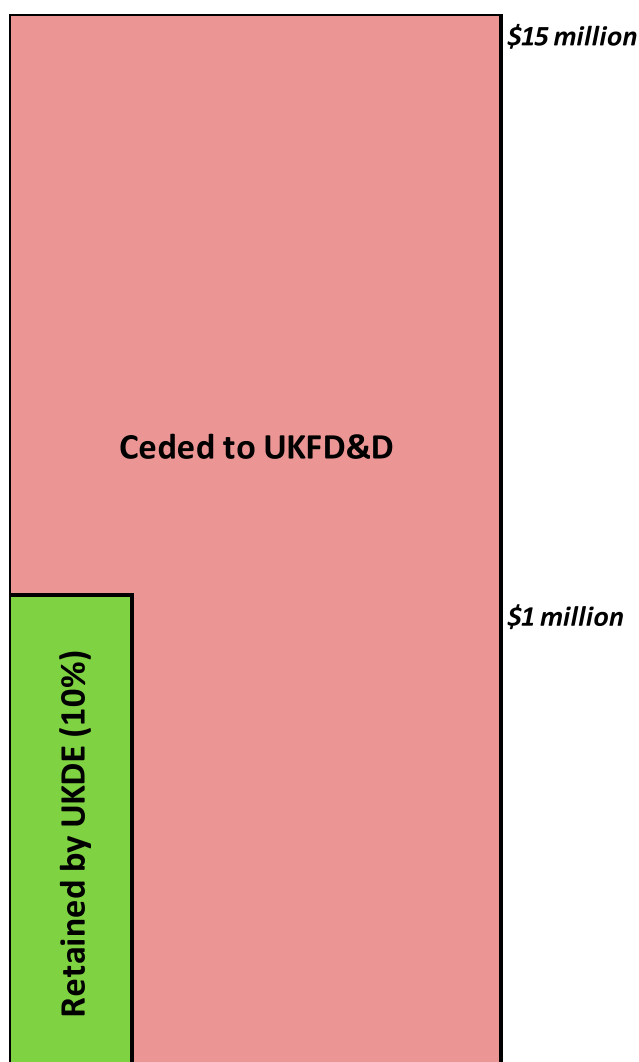
## A. Business and Performance (continued)

### A.2. Underwriting Performance (continued)

#### Risk mitigation (continued)

As of 21st February, 2025 the reinsurance arrangement between the Company and its parent company, The United Kingdom Freight Demurrage and Defence Association Limited, has been terminated. The reinsurance arrangements has been replaced with an agreement between the Company and The United Kingdom Defence Insurance Association (Isle Of Man) Limited, under the same terms and conditions. There was no financial impact to the Company.

The below table illustrates the reinsurance programme of the Company:



Exposure to reinsurance counterparties in excess of \$1 million is mitigated by the Group placing its external reinsurances with counterparties rated A- or better.

On its 90% reinsurance programme for claims below \$1 million, the Group has the benefit of a legal charge in the form of a fixed charge debenture over UKDIA's assets which mitigate the Group's exposure to Reinsurers' share of technical provisions.

## A. Business and Performance (continued)

### A.3. Investment Performance

In accordance with the investment policy of the Company, the investment mandate is updated on a regular basis. The table below shows the Company's invested assets split by asset class as reported in the Company's IFRS financial statements:

Invested assets split by asset class as at 20 February 2025:

Asset class	20/02/2025 UK£	20/02/2024 UK£
Financial assets at fair value through profit or loss	3,979,149	4,386,586
Cash at bank	242,632	165,954
<b>Total financial assets</b>	<b>4,221,781</b>	<b>4,552,540</b>

The following table details the Company's investment income by asset class as reported in the Company's IFRS financial statements:

Investment return split by asset class as at 20 February 2025:

	20/02/2025 UK£	20/02/2024 UK£
Financial assets at fair value through profit or loss	221,191	90,516

### A.4. Performance from other Activities

The Company has no activities other than its principal insurance activities as presented in A2 – Underwriting performance.

## **A. Business and Performance (continued)**

### ***A.5. Any other Information***

Overall, the Company produced an accounting profit after tax of UK£69,031 (2024: UK£162,656) for the year resulting in retained earnings of UK£314,868 (2024: UK£245,837 ) in the IFRS financial statements. Total comprehensive income for the year was UK£69,031 (2024: UK£162,656).

#### **Geopolitical conflicts**

The ongoing geopolitical uncertainties, including the prolonged Russia – Ukraine conflict, the escalating tensions in Middle East, the change of government in the US along with political and economic developments in Europe and the commercial hub of the Asian region, continue to impact global markets and economic stability. The imposition of new and changing sanctions regimes, trade tariffs and regulatory measures has led to increased compliance requirements and higher costs for global trade. These factors present ongoing challenges to the broader geopolitical landscape. The Company continues to keep the position under review and ensures compliance with the changing sanction measures whilst acting for the benefit of the Group's overall Membership.

#### **Climate change**

Financial risks arising from climate change is a key area of focus for regulators. The Company has appointed the Risk Officer as the Senior Management Function holder with the responsibility for identifying and managing exposures from climate change and ensuring that the regulator's expectations are met. The continuing emergence of different elements of climate change is being monitored to assess whether and to what extent they might affect future exposure for the Company. The changes imposed on the shipping industry in order to reduce the industry's impact on the environment and climate change regulation developments have, or may have, an impact on Members' existing business models. In turn, this could impact the Company's business model. The Company is likely to be most impacted during the period of adjustment whilst the industry tries to address new environmental regulations.

The Company has considered climate change risk as a risk that manifests through the established principal risks and cascades through the various functions of the Company (underwriting, credit, operational and financial). As such additional procedures and controls as well as updates in the existing mitigating controls have been introduced, in order to ensure that climate changes risks are identified, measured, monitored and managed, against the risk appetite and business risk model. The Company is developing measures and stress tests to manage the potential risks arising from climate change. The Managers are implementing measures to reduce energy consumption, increase the scope of recycling within its office operations, and to raise awareness amongst employees of environmental responsibility and promote sustainable business.

## **A. Business and Performance (continued)**

### ***A.5. Any other Information (continued)***

#### **Climate change (continued)**

The Company continues to monitor these developments closely and has taken proactive measures to mitigate risks, including:

- Enhancing due diligence and compliance frameworks to address evolving regulatory requirements.
- Assessing exposure to high-risk trade routes and adjusting operational strategies accordingly.
- Maintaining a prudent underwriting approach to ensure financial resilience amid market volatility.

While uncertainties persist, the Company remains committed to navigating these challenges through disciplined risk management, operational adaptability, and strategic planning to safeguard its financial position and support its Members effectively.

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## **B. System of Governance**

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

#### **The Board of Directors**

The ultimate responsibility for the governance of UKDE rests with the Board of Directors. Its role is to provide supervisory oversight of the Company within a framework of prudent and effective controls which enables each of the risks faced by the Company to be assessed and managed. The Board is responsible for promoting the long-term success of the Company whilst securing an appropriate degree of protection for policyholders. The Board of Directors comprises of executive and non-executive directors. Non-executive directors are individuals who are figures of standing within the shipping industry, are equity principals or main board directors of the organisations which they represent which in turn are policyholders of the Company. Executive directors hold key functions in the Company. The Directors meet three times a year.

The Board of Directors may delegate any of its powers, duties or discretions to committees consisting of such Directors as it sees fit. Delegation to Committees does not in any way compromise the Board of Directors from collectively discharging its duties and responsibilities. The Board of Directors is informed of the main issues discussed as all minutes of the meetings of the committees are distributed to the Board of Directors.

The Board of Directors comprises of the following Members:

<b>Name</b>	<b>Position</b>	<b>Role</b>
Daniel John Evans	Chief Executive Officer, Director	Executive Director
Petros Pappas	Non executive and Independent Director	AR&R Committee - Member
Polys Hajioannou	Non executive and Independent Director	AR&R Committee - Member
George Mouskas	Non executive and Independent Director	AR&R Committee - Member
Ioannis Triphyllis	Non executive and Independent Director	AR&R Committee - Member
Maria Savva	Chief Financial Officer, Risk Officer, Director	Executive Director

#### **Committees**

The following committees aid the Board of Directors in its duties:

##### ***Audit, Regulatory & Risk Committee***

The Audit, Regulatory & Risk Committee (“AR&R”) considers various issues relating to the sound and prudent management of the Company. The AR&R Committee is accountable to the Board of Directors and assists the Board of Directors in meeting its responsibilities in ensuring an effective system of internal control and compliance and for meeting its external reporting obligations, including its obligations under applicable laws and regulations and is directly responsible on behalf of the Board of the Board for the oversight of the External Auditor.

## **B. System of Governance (continued)**

### ***B.1. General Information on the System of Governance (continued)***

#### *Group Management Fee Committee*

The Group Management Fee Committee meets periodically/ad hoc and its main role is to negotiate with the Managers the management fee arrangements of the Company on behalf of the Board of Directors.

#### **Key functions**

##### *The Managers*

The Company has no employees and as such the Board of Directors relies on the Managers for the day-to-day management duties of the Company. The Management function is performed by the Thomas Miller Group of Companies. The functions and responsibilities of the Managers are set out in the Management Agreement between the Managers and the Company.

The Board of Directors may delegate a wide range of powers, duties and discretions to the Managers on such terms as it sees fit. Under the Articles of Association the Managers are entitled to attend all meetings of the Board of Directors and of committees of the Board of Directors and all general meetings of the Company and have a representative on the Board of Directors.

##### *The Investment Managers*

Investment of the Company's funds is conducted by the Investment Managers in accordance with the Board of Directors' Investment Policy and is subject to internal compliance procedures.

The functions and responsibilities of the Investment Managers are set out in the Management Agreement between the Investment Managers and the Company.

#### **Governance**

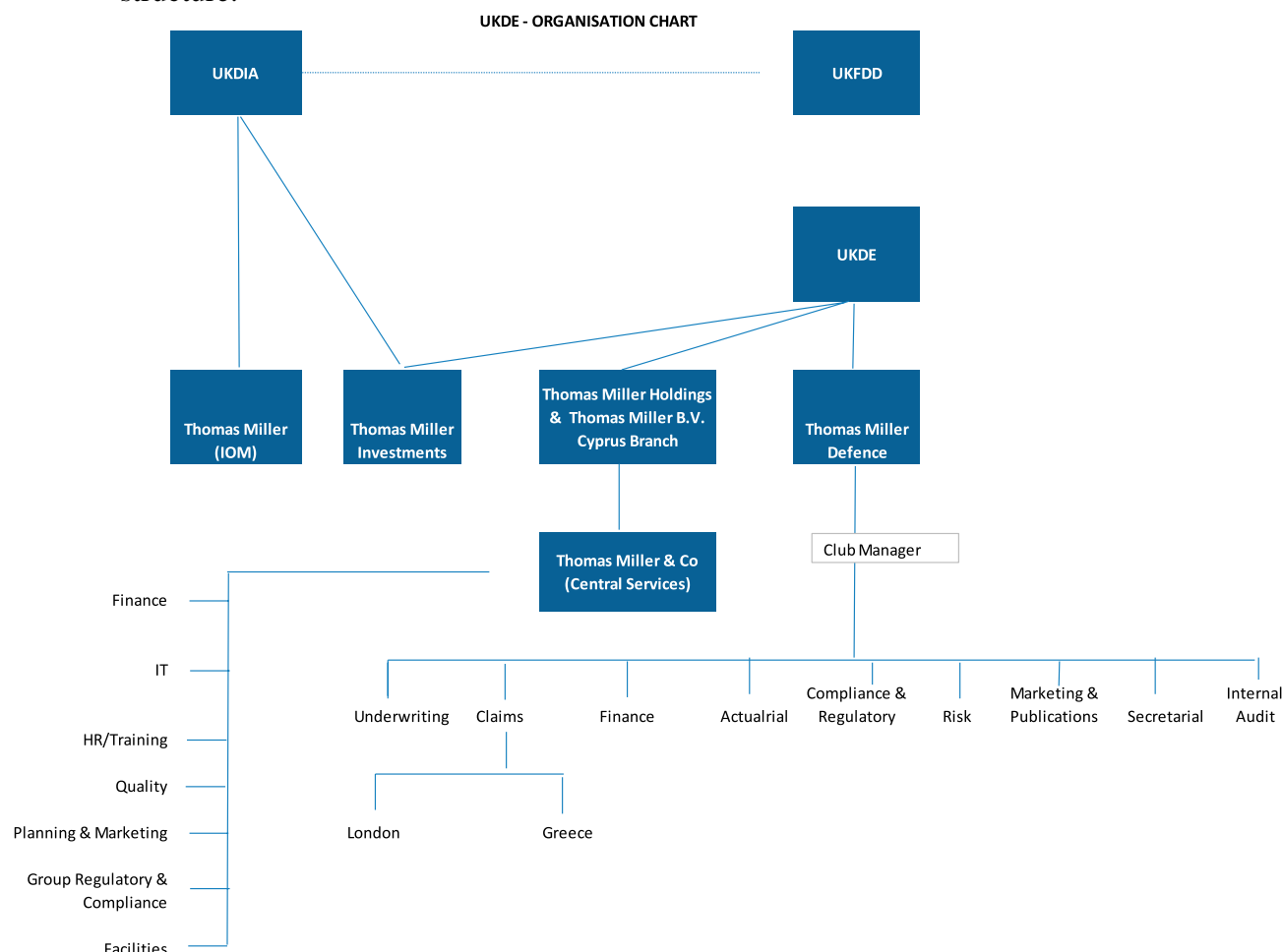
The Company's maintains a prescribed set of responsibilities for the following functions

- Chairman (Board)
- Chief Executive Officer (Board / Managers)
- Chief Operating Officer (Manager)
- Chief Financial Officer (Managers)
- Chief Risk Officer (Managers)
- Head of Internal Audit (Managers)
- Chair of Audit, Regulatory and Risk Committee (Board)
- Chief Actuary (Managers)
- Chief Underwriting Officer (Managers)
- Claims Function (Managers)
- Investment Manager (Managers)
- Compliance Officer (Managers)

## B. System of Governance (continued)

### B.1. General Information on the System of Governance (continued)

The Company's organisation chart is shown below. It details the more granular reporting lines and delegation of responsibilities within the management and investment management structure:



### Remuneration

Directors receive an attendance fee for each meeting and an annual fee. Directors' fees are not subject to pension or early retirement schemes and there are no variable components to the Directors' remuneration.

The Company has no internal executive function and its management is wholly performed by companies within the Thomas Miller Holdings Ltd group of companies. The Managers are responsible for recruitment in line with the Thomas Miller Group Recruitment Policy and performance management, ensuring that all staff have and maintain the relevant skills, knowledge and expertise necessary to perform their roles and responsibilities.

## **B. System of Governance (continued)**

### ***B.1. General Information on the System of Governance (continued)***

#### **Related party transactions**

The Company is 100% owned by UKFDD.

Four out of the six directors are representative from the Member companies and two are representatives of the Manager. Any transactions are arranged on an arm's length basis and the Directors have no financial interests in the Company.

Until 20 February 2025, the Company reinsured with UKFDD on a 90% quota share basis. As of 21 February 2025, the Company reinsures directly with UKDIA on the same basis.

### ***B.2. Fit and Proper Requirements***

Persons responsible for running the Company, including executive senior management and key function holders fall into the scope of Fit and Proper requirements, as per the Principles and Code of Ethics and Conduct, to achieve competence.

For the above identified individuals, Supervisory Authority approval is required before the appointment of the position. The Board of Directors maintains ultimate responsibility to notify the supervisory authority of the key functions identified in the Company, and the individuals that are in scope of the fit and proper requirement, ensure they are fit and proper and seek approval from the Supervisor with regards to the Fitness and Propriety of the individuals stated above.

All persons within the scope of the Company's Fit and Proper requirements must have the professional qualifications, knowledge and experience and demonstrate the sound judgement necessary to discharge their areas of responsibility competently, both at the time of their appointment or employment and on a continuous basis to meet the changing or increasing requirements of their particular responsibilities and the business in general. They must be of good repute and demonstrate in their personal behaviour and business conduct character, integrity and honesty. As part of the assessment consideration will be given to potential conflicts of interest and financial soundness. The level of fitness must be appropriate and proportionate to each person's role, tasks and responsibilities.

The Board of Directors must be composed in a way to ensure that its members collectively possess sufficient knowledge, competence and experience to direct and oversee the Company's affairs effectively.

## **B. System of Governance (continued)**

### ***B.2. Fit and Proper Requirements (continued)***

The Fit and Proper requirements applies to:

- All Directors of the Company;
- All employees of the Managers who are members of the Thomas Miller's senior management; and
- Persons within the Managers responsible for key functions, being function holders for Risk Management, Regulatory Compliance, Actuarial and Internal Audit.

For the individuals under the scope of the Fit and Proper requirement, the following controls are performed upon appointment:

- Credit search - No Bankruptcy Certificate
- Identity check
- Sanctions Screening
- Criminal Records check – Certificate of clean criminal record
- Educational and Professional Certificates

Fitness will include an assessment of the person's management and/or technical competencies required for the role based on qualifications, knowledge, experience and the demonstration of due skill, care, diligence and compliance with relevant standards (as applicable). Propriety will include an assessment of the person's reputation and past conduct.

Fit and proper assessments are carried out by the Chairman, the Group Manager or the Compliance Officer. No person is permitted to undertake their own assessment.

## B. System of Governance (continued)

### B.3. Risk Management System

#### Overview

The management of risk is of critical importance to the Company and is a key area of responsibility for the Board of Directors and the Audit, Regulatory and Risk Committee. The diagram below illustrates how risk reporting cascades through the business from risk owners through the Chief Risk Officer (“CRO”) to the Committee and Board.



The Company uses a Risk Management Framework to design an effective risk management system with an integrated approach to risk management and the application of the three lines of defence:

- 1st line of defence: business units, process and risk owners
- 2nd line of defence: risk management and compliance functions
- 3rd line of defence: internal and external audit

The risk management system includes:

- a clearly defined and well-documented risk management strategy;
- appropriate processes and procedures;
- appropriate reporting procedures;
- reports on the material risks faced by the Group and on the effectiveness of the risk management system;
- policies or frameworks; and
- a suitable Own Risk and Solvency Assessment (“ORSA”) process.

## **B. System of Governance (continued)**

### ***B.3. Risk Management System (continued)***

#### ***Overview (continued)***

The risk management system has a coherent focus on data and IT infrastructure governance and appropriate policies and standards to outline the framework within which responsibilities will be exercised. It is supported by a robust internal control system and is designed to manage significant risks to the achievement of the Group's business objectives. The core elements of the risk management framework are as follows:

#### ***Risk Management Strategy***

The objectives of the risk management strategy are to identify, measure, monitor, manage, and report in a consistent, continuous and timely fashion, on the basis of the risk appetite as set by the Board of Directors.

Forecasts and long-term projections of how the business needs to develop and which internal and/or external factors might affect or impede such development are considered when carrying out business strategy reviews. Risk related to initiatives and objectives adopted in the business plan are added to the Business Risk Log.

#### ***Business Risk Log***

Risks to the business that could inhibit the Company achieving its business plan objectives are described in the Business Risk Log, together with the consequences should the risk materialise. The risks are categorised and assessed and monitored on an ongoing basis.

Each risk in the Business Risk Log is assigned a Risk Owner and an accountable person. Risk Owners are required to report on their owned risks as part of a twice-yearly reporting process. Key themes are reported to the Audit, Regulatory & Risk Committee. The reporting process also includes potential emerging risks identified during the reporting period which are recorded in an Emerging Risk Log, and loss and near miss events.

A rating for each risk is determined by assessing its probability and impact. The assessment of each risk is on the basis of Inherent Risk and Residual Risk which is the risk that remains after taking into account the strength of current risk management procedures that are in place.

#### ***Risk Policies and Procedures***

The Company's strategy is specified in more detail through its policies and business plan which underpin its day-to-day business. Policies define the Group's approach to risk management overall and more specifically the risk for which the policy has been written. The policies establish the controls, procedures, limits and escalation to ensure that the risks are managed in line with risk appetite. Specific procedures, where appropriate, have been developed to provide full understanding of the means by which the first and second lines of defence will implement the strategy.

## B. System of Governance (continued)

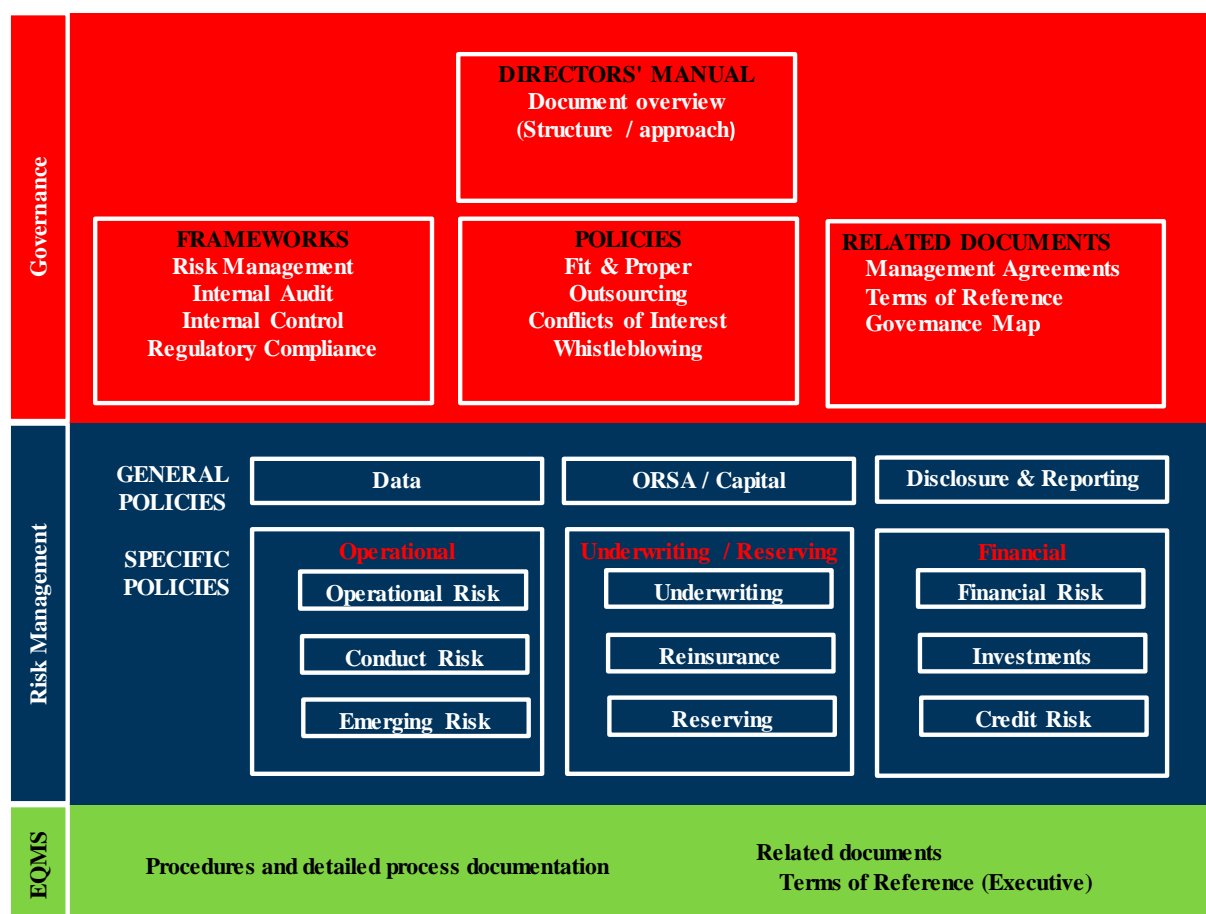
### B.3. Risk Management System (continued)

#### *Risk Policies and Procedures (continued)*

The policies include appropriate reporting procedures to ensure that information relating to the component elements of the risk management is routinely reported to the Audit, Regulatory & Risk Committee and to the Board of Directors.

The Company's governance and risk documentation is contained in the Manager's electronic repository and include Governance documentation, Management agreements, Risk Management, Internal control, Regulatory frameworks, Policies, procedures and detailed process and related documents.

The Company's governance and risk documentation includes the following:



## **B. System of Governance (continued)**

### ***B.3. Risk Management System (continued)***

#### ***Risk Appetite***

The Company's Risk Appetite is articulated in the statement of risk appetite, which is a document owned by the Board of Directors and reviewed on a regular basis as new risks emerge, or at least annually. The Company's business strategy is aligned to the Corporate Plan and focuses on three critical areas:

- Strong independent financial position
- Sound underwriting and claim management
- Enhanced market share

The Board of Directors determines the appropriate risk appetite and sets the Company's risk strategy. It has developed high-level risk appetites that are used by the Board of Directors to monitor the implementation of the risk strategy.

The Board of Directors bears ultimate responsibility for the management of risk and for maintaining a sound system of internal control that supports the achievement of the business strategy, policies, aims and objectives of the Company. The Audit, Regulatory & Risk Committee supports the Board of Directors by providing oversight of the Risk Management Function.

#### ***Key risks***

A list of key risks has been compiled by the Company's Board of Directors and senior management of the Company based on their experience and expert judgement in running the business. This list provides a high-level overview of the principal risks faced by the business which, individually or in combination, may have a significant, substantial or catastrophic impact on the Company and is aligned with the key risks for the Group. The key risks affecting the Company are agreed by the Audit, Regulatory & Risk Committee each year.

#### ***Own Risk and Solvency Assessment ("ORSA")***

Every year, and on an ad hoc basis, if circumstances materially change, the Company prepares an ORSA overview report. The ORSA is the process used by the Company to manage its financial and solvency position over the period of its Corporate Plan and the ORSA overview report is the culmination of this process into a report reviewed by the Board of Directors. As such, it is an intrinsic part of the Company's Corporate Planning Process and it is taking into account in assessing the Company's report.

The key elements of the ORSA process are:

- An analysis of recent performance
- Assessment of the risk profile
- Consideration of business planning and stress scenarios

The Audit, Regulatory and Risk Committee reviews the ORSA and recommends it for approval and use by the Board of Directors.

## **B. System of Governance (continued)**

### ***B.3. Risk Management System (continued)***

#### ***Own Risk and Solvency Assessment (“ORSA”) (continued)***

The Board of Directors reviews the ORSA and considers appropriate action for the Company such as:

- Capital related decisions
- General Increase considerations
- Reassessment of risk profile and risk appetite
- Additional risk mitigating actions

The assessments to date indicate that the Company is adequately capitalised.

#### ***Risk Controls***

The Company’s Risk Management Framework has been developed to manage risks across the business, using internal control policies, procedures and processes to control risks.

Whereas ultimate control for each risk rests with the Board of Directors, day-to-day control is exercised by the Risk Owners unless otherwise stated, as set out in the Business Risk Log. Further information on the Company’s Internal Control Framework may be found in B.4 – Internal Control System.

#### ***Risk Reporting Procedures***

Risk Owners identify operational risk loss or near miss events which are reviewed by the Management Board and then recorded on the operational risk database with remedial actions identified for which a completion date is set.

#### ***Implementation of the Risk Management system***

The Risk Management Function is fulfilled by the Company’s Risk Officer who oversees risk management; provides independent challenge; and has direct access to the Chairman of the Audit, Regulatory & Risk Committee. The Risk Management Function maintains an organisation-wide and aggregated view of the risk profile of the Company, including monitoring risk tolerances against appetite, and advising on how risks might impact the business singly and in combination.

The integration of risk management processes with business activities is performed through the requirement for business function heads who are also risk owners on the Business Risk Log to focus on risk management on an ongoing basis whilst ensuring that the risks for which they are responsible remain within risk tolerance. This demonstrates the proactive application of risk management techniques to support the business processes and decision-making for which they are also responsible in their day-to-day insurance business activities.

## **B. System of Governance (continued)**

### ***B.4. Internal Control System***

Internal control is defined as a continually operating process effected by the Board of Directors, its Audit, Regulatory & Risk Committee, the Managers, all staff and systems and designed to support the Company in achieving its business plan objectives through efficient and effective operations and to protect its resources. Each Risk Owner, as named in the Business Risk Log, is responsible for the application of the Internal Control Framework and the design, development, implementation, documentation and maintenance of effective internal control processes in their area and reporting thereon.

The Managers are responsible for establishing and maintaining an effective control environment throughout the organisation. In furtherance of that, there is a culture which values the highest levels of integrity in the staff, together with openness and honesty in relation to the conduct and reporting of all activities. Policies, procedures and processes are designed to define and support effective, efficient and appropriate activities at every level of the business.

#### *Control activities*

These activities are embedded into plans, policies, procedures, systems and business processes. Their effectiveness relies on the level of compliance by management and staff.

The nature of the controls implemented and the level of control exercised are based on the assessment of frequency and impact of the risk, risk appetite and the cost of implementing controls relative to the significance of the risk.

The Internal Control Framework as a whole and internal control processes individually are monitored on an ongoing basis through the following mechanisms:

- Performance indicators
- External data
- Analyses and reconciliations
- Regulatory compliance monitoring audits
- Internal audits
- Procedure monitoring audits

The Risk Function is authorised to: investigate and challenge any actions or concerns without influence from the business; be independent of operational business functions and without undue influence from the Board of Directors or other functions/management; have unfettered and direct access to all activities in its area of responsibility, including all documentation, systems, staff, Management, executive and non-executive Board members; and have direct access to the Chairman of the Audit, Regulatory & Risk Committee.

The Risk Management Framework encompasses a number of elements that together facilitate an effective and efficient operation, enabling the Group to respond to a variety of risks.

## **B. System of Governance (continued)**

### ***B.4. Internal Control System (continued)***

#### ***Compliance function***

The Company takes a risk-based approach to regulatory compliance, focussing on preventing breaches to regulatory principles and other rules and informing the relevant regulators of any that are material, or must be reported to regulators on a mandatory basis.

In all cases of a regulatory breach, the Compliance Function investigates the cause and effect of breach and recommends remedies to the Managers' Management Board for approval.

The Board of Directors bears ultimate responsibility for Regulatory Compliance, and is supported by the Audit, Regulatory & Risk Committee.

The Compliance Function advises on and promotes compliance with applicable laws, regulatory requirements and administrative provisions and coordinates and monitors implementation of policies, processes and procedures to achieve compliance across the business, and manages regulatory compliance risk.

### ***B.5. Internal Audit Function***

The internal audit relationship is regulated by an Internal Audit Framework. Internal Audit is the "third line of defence" in the Company's internal control framework, established to provide independent assurance that the systems of internal control established by management ("first line") and the monitoring and oversight provided by the Risk Management and Compliance Functions ("second line") are fit for purpose and operating effectively.

The objectives of the Internal Audit Function are to provide independent assurance that business risks are identified and are being well managed and controlled by effective systems of internal control.

The Internal Audit function of the company is provided by the Managers who employ an independent Head of Internal Audit ("HIA") who in turn reports to the Chair of the Audit, Regulatory and Risk Committee. The HIA may engage third parties to conduct some Audits under his/her management if it is felt that specific technical skills are required or where insufficient general audit resource is available.

#### **Independence**

The Internal Audit Function is independent from the organisational activities audited and free to exercise its assignments without impairment and on its own initiative in all areas. It is not authorised to carry out any operational work on behalf of any area of any business. The Head of Internal Audit reports directly to the Chair of the Audit, Regulatory and Risk Committee.

## **B. System of Governance (continued)**

### ***B.5. Internal Audit Function (continued)***

#### **Development of plans**

Audit Plans are developed by the Internal Audit Function on a rolling three year basis, subject to annual review and approval by the Audit, Regulatory and Risk Committee. The plan is designed to provide for all significant areas of the business to be audited during each three year period.

#### **Planning**

The Internal Audit Function will prepare an Audit Planning Memorandum (“APM”) for each audit, which describes the scope of the Audit and the key risks to be addressed. There will be a formal opening meeting at which the appointed audit team will meet relevant line management to discuss the planned audit and agree the scope of work.

The finalised APM will be sent to relevant line management and copied to appropriate business executives who have an interest in the outcome of the Audit.

#### **Execution**

The audit team is responsible for conducting the fieldwork including performing whatever control evaluation, substantive and compliance testing is deemed necessary. The Internal Auditor leading the assignment will discuss any findings as they arise with appropriate management to ensure that any misunderstandings or queries are dealt with as soon as possible.

An ‘end of fieldwork’ meeting will be held to confirm the factual accuracy of any control weaknesses identified during the course of the fieldwork and the recommended remedial action will be discussed at this meeting.

#### **Reporting**

A comprehensive Internal Audit report will be produced following completion of every Audit engagement. This report will include a description of any control deficiencies identified as well as the actions that have been agreed will be implemented to remedy these.

The report will include the names of the individuals responsible for remedial action and the date by which such actions will be completed.

All Internal Audit reports will be given an overall control rating which will be based on the severity of any individual control deficiencies identified.

The method of determining an overall control rating for Audit reports and for individual control weaknesses is described in the ‘TMIA Framework’ which is the methodology used by the Internal Audit function.

## **B. System of Governance (continued)**

### ***B.6. Actuarial Function***

The Board of Directors are ultimately responsible for ensuring an effective Actuarial Function. This function is performed by the TM Actuarial Team, led by its Chief Actuary.

The Actuarial Function is independent of the Association's management team and therefore able to undertake its duties in an objective, fair and independent manner. However, for operational purposes, the Actuarial Function is integrated into the Company's internal control system through its role on the Managers' committees and attendance at Board meetings.

The Actuarial Function undertakes all responsibilities as required by Solvency II, including:

- coordinating and overseeing 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;
- informing the Board of Directors 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 including capital requirements and the ORSA process.

### ***B.7. Outsourcing***

The Company has in place an outsourcing policy which is directed at services or activities which are particularly important or critical to the Company's business (material business activities).

Material business activities include the key functions of the Company's system of governance such as Risk Management, Compliance, Actuarial and Internal Audit as applicable, and all functions or activities that are fundamental to enable it to carry out its core business, including underwriting, claims handling and investments.

#### ***Management outsourcing***

The Company has no internal executive function and its management is wholly outsourced to the Managers under a management agreement. In order to comply with its regulatory obligations, the Board of Directors has developed monitoring and reporting procedures and has delegated to the Audit, Regulatory and Risk Committee the monitoring of internal controls and risk. The risk control and reporting procedures to be followed by the Managers form part of their obligations under the Management Agreement. The Committee reports to the Board of Directors.

## **B. System of Governance (continued)**

### ***B.7. Outsourcing (continued)***

#### ***Investment management outsourcing***

Management of the Company's investments is outsourced to Thomas Miller Investment Limited, part of the Thomas Miller group of companies, under an investment Management Agreement.

The performance of the investment managers is monitored and supervised by the Board of Directors.

#### ***Internal audit outsourcing***

The Company's internal audit function is outsourced to Thomas Miller Internal Audit. Internal Audit is supervised by the Audit, Regulatory and Risk Committee and the Board of Directors.

#### ***Oversight***

The Board of Directors bears ultimate responsibility for outsourced functions, services, or activities and related governance. The Board of Directors is supported by the Audit, Regulatory and Risk Committee which reviews outsourcing arrangements and the Managers' Management Board which monitors the activities of the Group, including outsourcing.

### ***B.8. Any Other Information***

It is considered that the system of governance in place is effective and provides a sound and prudent management of risks faced by the Company. The Company's organisational structure supports the strategic objectives and operations of the Company and ensures that the Board of Directors is able to take business decisions with a full appreciation of the impact on risk exposures and assess compliance with the Company's appetite.

The Company considers no other information material to be disclosed.

## **C. Risk Profile**

The Company has set out a number of risk appetite statements which guide the implementation of its business plan. Currently the Company is operating in line with its risk appetite.

The following sections consider each of the Company's risk categories. The key risks are Underwriting Risk and Market Risk.

### ***C.1. Underwriting Risk***

The Company is a monoline insurer, underwriting only legal expense insurance for ship owners or operators.

Underwriting risk is the risk that the Company's net insurance obligations (i.e. claims less premiums) are different to expectations. The Company considers the risk of existing obligations (Reserve Risk) separately to the risk of future obligations (Premium Risk).

Reserve risk is managed by the Company's reserving policy. The Company establishes provisions for unpaid claims, both reported and unreported, and related expenses to cover its expected ultimate liability. These provisions are established through the application of actuarial techniques and assumptions. In order to minimise the risk of understating these provisions the assumptions made and actuarial techniques employed are reviewed in detail by management.

Premium risk is managed by an underwriting policy which establishes robust underwriting practices in order to meet business needs and satisfy regulatory control. These are supplemented with a robust forecasting approach undertaken as part of the Association's ORSA process.

Underwriting Risk is mitigated via the Company's reinsurance programme which covers claims in excess of \$1.0 million. Of the \$1.0 million per claim retained by the Company, 90% of the risk is covered by the Company's parent quota share reinsurer, UKFDD. Underwriting Risk is most sensitive to an increase in expected claims costs. As of 21 February, 2025 the reinsurance arrangement with UKFDD has been terminated and the Company entered in a reinsurance arrangement with UKDIA with the same terms and conditions. This new arrangement had no financial impact to the parties.

### ***C.2. Market Risk***

Market risk arises through fluctuations in interest rates, corporate bond spreads and foreign currency exchange rates. Such movements will affect not only the Company's investments, but also the value of other assets and liabilities such as premium income, claims payments and reinsurance recoveries.

The Company has an investment policy in place to manage exposure to its investments, and this is monitored by regular reports from the investment managers. Further discussion of this arrangement is provided below under the "prudent person principle".

The United Kingdom Freight Demurrage and Defence Insurance (Europe)  
Limited

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## C. Risk Profile (continued)

### C.2. Market Risk (continued)

Currency risk is a key risk for the Company as it primarily receives its premium income in US Dollars, but much of its outgoings are in Sterling or Euros. Currency risk is mitigated by the Company's Asset-Liability-Management ("ALM") programme whereby all insurance balances are 90% matched on a currency basis under the Company's reinsurance contract with UKFDD.

The following table details the Company's exposure to currency risk by each underlying currency as reported in the annual Financial Statements:

**As at 20 February 2025**

	<b>Sterling UK£</b>	<b>US Dollar UK£</b>	<b>Euro UK£</b>	<b>Total UK£</b>
<b>Financial and insurance assets</b>				
Financial assets at fair value through profit or loss	3,231,522	747,627	-	3,979,149
Accrued interest	5,252	-	-	5,252
Reinsurance contract assets	1,950,992	-	-	1,950,992
Trade and other receivables	-	5,930	-	5,930
Cash at bank	29,525	177,259	35,848	242,632
Total financial and insurance assets	<u>5,217,291</u>	<u>930,816</u>	<u>35,848</u>	<u>6,183,955</u>
<b>Financial and insurance liabilities</b>	<b>Sterling UK£</b>	<b>US Dollar UK£</b>	<b>Euro UK£</b>	<b>Total UK£</b>
Insurance contract liabilities	1,854,734	205,855	-	2,060,589
Trade and other payables	-	6,800	91,055	97,855
Total financial and insurance liabilities	<u>1,854,734</u>	<u>212,655</u>	<u>91,055</u>	<u>2,158,444</u>

#### *The prudent person principle*

Under the Group's investment policy, all of the Group's investments are invested and managed in accordance with the 'prudent person principle', meaning that duties of the Investment Managers are discharged with the care, skill, prudence and diligence that a prudent person acting in a like capacity would use in the conduct of an enterprise of like character and aims.

## C. Risk Profile (continued)

### C.2. Market Risk (continued)

*The prudent person principle (continued)*

More specifically:

- to invest in assets and instruments whose risk can properly be identified, measured, monitored, managed, controlled and reported;
- to ensure the security, quality and liquidity of the portfolio as a whole;
- appropriate to the nature and duration of the Group's insurance liabilities;
- derivative instruments are possible if they contribute to a reduction of risks or efficient portfolio management;
- unlisted investments and assets are kept to prudent levels; and
- properly diversified to avoid excessive reliance on any asset, issuer or group, or geographical area.

The Group's funds are invested by the Investment Managers in accordance with parameters set by an Investment Mandate. The Investment Mandate provides a framework to the Investment Managers for the management and stewardship of the Group's investment assets in conformity with the business and investment objectives and sets the parameters within which the Group's basis and ad hoc as required and is subject to the Group's Investment Policy. The Investment Managers report to the Board of Directors at each meeting.

### C.3. Credit Risk

Credit risk is the risk of loss in the value of the above financial assets due to counterparties failing to meet all or part of their obligations. The following table illustrates aggregate credit risk exposure for financial assets as reported in the Company's annual financial statements. The credit rating bands are provided by independent ratings agencies:

**20 February 2025**

	AAA - A	Not rated / not readily available	Total	Concentration
	UK£	UK£	UK£	%
Debt securities at fair value through profit or loss	1,227,323	-	1,227,323	36%
Reinsurance contract assets	-	1,950,992	1,950,992	57%
Accrued interest	5,252	-	5,252	0%
Trade and other receivables	-	5,930	5,930	0%
Cash at bank	242,632	-	242,632	7%
<b>Total assets subject to credit risk</b>	<b>1,475,207</b>	<b>1,956,922</b>	<b>3,432,128</b>	<b>100%</b>

## C. Risk Profile (continued)

### C.3. Credit Risk (continued)

The Company's objective is to reduce credit risk through the risk management techniques discussed below.

The Company's exposure primarily relates to its 90% quota share arrangement with its parent company (UKFDD). Exposure is mitigated through the robust capital and solvency position of UKFDD.

Exposure to debtors is mainly in respect of calls and premium contributions. This is spread over a large number of policyholders and counterparties, which mitigates the risk. In addition, the Company has policy in place with which it carries out financial checks on existing and potential policyholders. Exposure to bank balances, however, is more concentrated, and the risk is mitigated by holding cash with reputable banking institutions with superior credit ratings for short term debt and by placing funds surplus to normal operational requirements in money market funds and other investments.

### C.4. Liquidity Risk

Liquidity risk is the risk that the Company is unable to make payments as they become due. As at year end the Company did not have any significant exposure, however, as per the Company's policy, this is managed by the use of liquid investments.

The following table provides a maturity analysis of the Company's financial assets representing the date that a contract will mature, amounts are due for payment or the asset could be realised without significant additional cost as reported in the Company's annual financial statements:

#### 20 February 2025

	Carrying amounts UK£	Contractual cash flows UK£	12 months or less UK£
<b>Financial assets</b>			
Financial assets at fair value through profit or loss	3,979,149	3,979,149	3,979,149
Accrued interest	5,252	5,252	5,252
Trade and other receivables	5,930	5,930	5,930
Cash at bank	242,632	242,632	242,632
Total financial assets	<u>4,232,963</u>	<u>4,232,963</u>	<u>4,232,963</u>
<b>Financial liabilities</b>			
Trade and other payables	<u>97,855</u>	<u>97,855</u>	<u>97,855</u>
Total financial liabilities	<u>97,855</u>	<u>97,855</u>	<u>97,855</u>

## C. Risk Profile (continued)

### C.4. Liquidity Risk (continued)

Insurance contracts issued and reinsurance contracts held	Carrying amounts	Contractual cash flows	12 months or less	1 to 2 years	2-5 years	More than 5 years
	UK£	UK£	UK£	UK£	UK£	UK£
Reinsurance contract assets	1,950,992	1,950,992	897,456	409,708	526,768	117,059
Insurance contract liabilities	(2,060,589)	(2,060,589)	(947,871)	(432,724)	(556,359)	(123,635)
Net undiscounted future cash flows	<u>(109,589)</u>	<u>(109,589)</u>	<u>(50,415)</u>	<u>(23,016)</u>	<u>(29,591)</u>	<u>(6,576)</u>

The amount of gross expected profits included in future premium is as per the Solvency II balance sheet UK£6851,438. However, it should be noted that the Solvency II balance sheet does not reflect all future expense cash flows and the actual expected profit over the year would be lower than this.

### C.5. Operational Risk

Operational risk is defined as the risk of direct or indirect loss resulting from inadequate or failed internal processes, people and systems or from external events. In order to mitigate such risks the Company has engaged Thomas Miller as managers to document all key processes and controls in a document management system. This system is embedded into the organisation and available to all staff. Compliance with the procedures and controls documented within the system is audited on a regular basis through quality control checks and the internal audit function which is directed and reviewed by the Audit, Regulatory & Risk Committee.

### C.6. Other Material Risks

There are no other material risks that the Company considers relevant for reporting.

### C.7. Stress and scenario testing

The Company carries out stress and scenario testing as part of its risk management and ORSA process.

The base case business plan forecast for the next 3 years is used as the starting point for scenarios testing. The impacts of adverse scenarios are then evaluated. Due to the low level of operations the Company did not prepare a separate ORSA last year, instead, its results were included in the Group's ORSA report.

## **C. Risk Profile (continued)**

### ***C.7. Stress and scenario testing (continued)***

1. Weaker than- and stronger than forecast GBP relative to USD
2. Below- and above forecast investment return
3. Adverse and favourable claims inflation
4. Impact of a cyber-security breach.
5. Significant adverse claims development as a result of a large number consecutive insolvencies
6. Impact of climate change on sustainability of Membership
7. Major currency movement
8. Impact of inflation and further downturn in economic markets
9. Impact of Ukraine – Russia War
10. Increase in complexity of sanctions regimes

Scenario's 1 to 5 highlighted that the Company would not move outside of its risk corridor in any of these scenarios. Scenario's 6 to 9 represents alternative scenarios, which are regarded as reverse stress tests. Whilst some of these scenarios caused the Company to break out of the bottom of its risk corridor, none of these scenarios caused the Company's capital resources to fall below its 1-in-200 capital requirement.

### ***C.8. Any Other Information***

The Company has not identified any other material information that is considered to be required to be disclosed.

## D. Valuation for Solvency Purposes

### D.1. Assets

A basic principle of Solvency II is that assets and liabilities are valued on the basis of their economic value. This is the price which an independent party would pay or receive for acquiring the assets or liabilities. The value of the assets less the value of the liabilities is then taken as the starting point for determining the available own funds.

Materially all of the valuation differences between the Solvency II balance sheet and the current accounting balance sheet relate to the valuation of insurance liabilities (“technical provisions”) which is further discussed in D.2 – Technical Provisions. The Company prepares its financial statements under the International Financial Reporting Standards (IFRSs) as adopted by the European Union (EU) and in accordance with the requirements of the Cyprus Companies Law, Cap. 113.

The Solvency II balance sheet is presented in S.02.01.02. A summary of assets is shown in the table below.

Valuation of the Company’s assets as at 20 February 2025:

	2025		2024	
	Solvency II UK£	Statutory UK£	Solvency II UK£	Statutory UK£
Financial assets at fair value through profit or loss	3,986,921	3,986,921	4,392,589	4,392,589
Reinsurance share of technical provisions	1,329,638		1,891,727	
Reinsurance contract assets		1,950,992		1,704,447
Insurance and intermediaries receivables	49,061	3,671	1,121	1,121
Reinsurance receivables	90,274	-	21,394	-
Cash and cash equivalents	242,632	242,632	165,954	165,954
Any other assets not elsewhere shown	26,083	26,083	14,716	15,464
	<u>5,724,609</u>	<u>6,210,299</u>	<u>6,487,501</u>	<u>6,279,575</u>

The above table presents amounts at Solvency II and IFRS valuation bases respectively.

The Company’s assets are valued using the following principles:

#### ***Reinsurer’s share of technical provisions***

Reinsurer’s share of technical provisions is treated consistently to gross technical provisions. Technical provisions is further discussed in D.2.

## **D. Valuation for Solvency Purposes (continued)**

### ***D.1. Assets (continued)***

#### ***Reinsurer's share of technical provisions***

These represent the reinsurer's share of the premium provisions (i.e. relating to the unexpired portion of the business), and the reinsurer's share of the outstanding claim reserves/provisions. Under IFRS, this item is relatable to the Insurance and Reinsurance Contract Assets which are measured on a Best Estimate basis and also include the IFRS17 Risk Adjustment and the respective payables and receivables that are related to the insurance contracts issued and the reinsurance contracts held.

#### ***Insurance and intermediaries' receivables***

These represent balances that are due for existing insurance contracts. Due to the short term nature of these balances, the carrying amount is considered to be a suitable proxy for its fair value. These amounts are accounted in accordance with IFRS 9 which incorporates an ECL adjustment based on expected collection. The value of insurance and intermediaries' receivables in the Company's financial statements forms part of the Insurance and Reinsurance Contract Assets, whereas under SII the insurance and intermediaries receivables exclude the future premium instalments which are allowed in the calculation of technical provisions.

#### ***Reinsurance receivables***

Represent the amounts due from Reinsurers (debit balances) and are measured on initial recognition at the fair value of the consideration received or receivable. Subsequently, they are measured at amortised cost, less any provision for impairment. The value of reinsurance receivables in the Company's financial statements forms part of the Insurance and Reinsurance Contract Assets

#### ***Cash and cash equivalents***

Cash and cash equivalents include cash at bank. The carrying value of these balances is considered to be a suitable proxy for fair value.

There are no material differences between the valuation used for solvency purposes and the valuation used in the Company's financial statements.

#### ***Any other assets not elsewhere shown***

These balances comprise sundry, short term receivables which are classified as sundry receivables in the statutory financial statements.

Due to the short term nature of these balances, their carrying amount is considered to be a reasonable approximation for fair value.

There are no material differences between the valuation used for Solvency purposes and the valuation used in the Company's financial statements.

## **D. Valuation for Solvency Purposes (continued)**

### ***D.1. Assets (continued)***

Net technical provisions as at 20 February 2025:

	2025	2024
	UK£	UK£
Gross best estimate	1,267,284	1,832,250
Risk margin	234,441	251,150
Reinsurance best estimate	(1,329,638)	(1,891,727)
Net technical provisions	<u>172,087</u>	<u>191,673</u>

### ***D.2. Technical Provisions***

The value of the Company's technical provisions is equal to the sum of the best estimate and the risk margin, which are calculated separately. Refer to Appendices S.17.01.02 and S.19.01.21 for further details on technical provisions. The Company's technical provisions are valued using the following principles:

#### **Bases, methods and main assumptions**

The technical provisions are valued using the methodology prescribed by the Solvency II Directive and associated regulations. They consist of a "best estimate" of future cash flows (claims, premiums and expenses), which are discounted in line with risk-free interest rates to give the "present value" of those cash flows. Finally, a (market value) "risk margin" is added to take the total to a notional market value (i.e. equivalent to the amount that insurance and reinsurance undertakings would be expected to require in order to take over and meet the insurance and reinsurance obligations).

#### ***Claims***

As the Company only covers legal expenses, all claims are analysed together in one risk group. Standard actuarial techniques are used to project these cash flows including chain ladder and Bornhuetter-Ferguson methods. The key assumptions related to the initial expected claims cost for each policy year and the projected notified claims development pattern. These methods are considered appropriate given the longevity and stability of the Association and its claims handling processes.

Allowance is made for claims on contracts bound, but for which coverage has not yet incepted (corresponding to the premium provision). These are valued using an inflation assumption applied to the previous year ultimate.

The future claims cash flows are the most uncertain element of the technical provisions. The uncertainty involved was further discussed in Section C1 on Underwriting Risk.

#### ***Premiums***

The premium cash flows in the technical provisions cover (i) the outstanding instalments of premium on expired business that are payable but not yet due on the valuation date (corresponding to the provision for claims outstanding); and (ii) the premium payable but not yet due on bound but not incepted business (corresponding to the premium provision).

## **D. Valuation for Solvency Purposes (continued)**

### ***D.2. Technical Provisions (continued)***

#### ***Expenses***

The Technical Provisions includes expense cash flows incurred in servicing insurance obligations. This includes both direct and overhead expenses, as well as investment management expenses. The provision is calculated directly in respect of the provision for claims outstanding (for expired business) and a corresponding amount is derived in respect of the premium provision (for bound but not incepted and unexpired business).

#### ***Risk margin***

The risk margin is calculated based on the requirement to hold capital to meet the SCR until all claims liabilities are settled and a prescribed cost-of-capital rate of 6% per annum. This calculation is based on the assumption that a “reference undertaking” takes on the insurance obligations (and associated reinsurance arrangements). The SCR in this context is made up of Underwriting Risk, Counterparty Default Risk and Operational Risk only; assets are assumed to be invested in such a way that Market Risk will be zero and the referencing undertaking does not take on any new insurance obligations. The SCRs in future time periods have been assumed to be directly proportional to the best estimate claims liabilities net of reinsurance recoverables at those points in time.

#### ***Sources of uncertainty***

The estimation of the ultimate liability arising from claims made under insurance contracts is the Group’s most critical estimate. There are several sources of uncertainty that need to be considered in the estimate of the liability that the Company will ultimately pay for such claims. Estimates are made for the expected ultimate cost of claims, whether reported or unreported, at the end of the reporting period. The estimate of IBNR is generally subject to a greater degree of uncertainty than that for reported claims. In calculating the estimated liability, the Company uses a variety of estimation techniques based upon statistical analyses of historical experience which assumes past trends can be used to project future developments.

In particular the following represents the main sources of uncertainty that may impact the outcome of the Company’s technical provisions:

- Certain claims may turn out to be significantly longer, or shorter tailed than the whole book leading to an over- / underestimation of claims reserves. There is also a uncertainty around numbers and average cost of these claims.
- There is potential for IBNER to deteriorate to a greater extent than allowed for in the projections.
- New and unexpected claims types could impact the reserving methodology. This is partly allowed for in the company’s provision for Events not in Data (“ENID”).
- Uncertainty surrounding the development and cash flow patterns may impact the outcome of the Association’s technical provisions.
- Currency and exchange rates are inherently uncertain and may impact the outcome of the final technical provisions amount.

## D. Valuation for Solvency Purposes (continued)

### D.2. Technical Provisions (continued)

#### *Differences between GAAP and Solvency II technical provisions*

	2025		2024	
	Solvency II UK£	Statutory UK£	Solvency II UK£	Statutory UK£
Technical provision non-life	1,501,724		2,083,400	
Insurance contract liabilities		2,104,763		2,228,138
	1,501,724	2,104,763	2,083,400	2,228,138

The main valuation principles of Solvency II leading to differences from reserves shown in the financial statements are:

- The concept of risk margin is only applicable under Solvency II basis;
- The concept of risk adjustment is only applicable under IFRS basis;
- The Liability for Remaining Coverage (“LRC”) under IFRS basis is replaced by the Premium Provision under Solvency II basis. The LRC reflects the Unearned portion of the premiums and deferred acquisition costs, which under normal circumstances, includes profit margins. The transition to the Premium Provision results in realising the profits embedded in the unexpired portion of the policies;
- The Liability for Incurred Claims does not exist for Solvency II purposes and is replaced by the best estimate of the claims provision;

### D.3. Other Liabilities

Valuation of the Company’s liabilities as at 20 February 2025:

	2025		2024	
	Solvency II UK£	Statutory UK£	Solvency II UK£	Statutory UK£
Insurance & intermediaries payables	34,428	34,428	63,684	47,878
Reinsurance payables	-	-	276,411	290,637
Payables (trade, not insurance)	182,602	182,602	142,715	142,715
	217,030	217,030	482,811	481,230

The above table presents amounts at Solvency II and IFRS valuation bases respectively.

The Company’s liabilities are valued using the following principles:

#### **Technical provisions**

Further detail on the Company’s valuation policy for technical provisions may be found in D.2.

## **D. Valuation for Solvency Purposes (continued)**

### ***D.3. Other Liabilities (continued)***

#### ***Reinsurance payables***

These represent balances that are due to be paid for existing reinsurance contracts. When these amounts are not yet due to be paid, they are included as a future cash flow in the calculation of reinsurance technical provisions.

Under statutory accounting requirements, these balances are presented separately on the face of the balance sheet whether they are due or not yet due.

#### ***Insurance & Intermediaries payables***

These represent balances payable on insurance contracts. Due to the short term nature of these balances, its carrying amount is considered a suitable proxy for fair value. There is no difference between the valuation for Solvency purposes and the valuation used in the Company's financial statements

#### ***Payables, trade not insurance***

These balances include sundry, short term payable balances the value and settlement of which contains little to no uncertainty. Due to the short-term nature of these items, the carrying amount is considered to be a suitable proxy for its fair value.

There are no material differences between the valuation used for Solvency purposes and the valuation used in the Company's financial statements.

#### ***Any other liabilities not elsewhere shown***

These balances represent sundry short term payables the carrying amount of which is considered a suitable proxy for fair value. There are no material differences between the valuation used for solvency purposes and the valuation used in the Company's financial statements.

### ***D.4. Alternative Methods of Valuation***

The Company does not utilise any material alternative methods of valuation.

### ***D.5. Any Other Information***

The Company has not identified any other information that it considers material to be disclosed.

# The United Kingdom Freight Demurrage and Defence Insurance (Europe) Limited

## E. Capital Management

### E.1 Own funds

	2025	2024
SCR ratio	256%	212%
SCR	1,565,908	1,845,407
Eligible own funds	4,005,854	3,921,291
Excess	2,439,946	2,075,884
MCR ratio	177%	166%
MCR	2,261,331	2,358,882
Eligible own funds	4,005,854	3,921,291
Excess	1,744,523	1,562,409
Tier 1 basic own funds	4,005,854	3,921,291
Tier 2 ancillary own funds	-	-

Accumulated income and expenditure account reserve and reconciliation reserve, which falls under Tier 1 and counts as Basic Own Funds (“BOF”). These funds may be fully utilised to meet both the Solvency Capital Requirement (“SCR”) and the Minimum Capital Requirement (“MCR”). Tier 1 BOF contains no significant restrictions affecting the availability and transferability of these own funds.

#### *Information, objectives, policies and processes for managing own funds*

The Company’s objective is that capital resources should exceed the Company’s regulatory requirements. The Association forecasts its capital over a 3 year planning horizon.

#### *Material differences between equity as shown in the financial statements and the excess of assets over liabilities*

The below table represents a reconciliation of Statutory equity reserves to Solvency II equity reserves.

	2025 UK£	2024 UK£
<b>Total Equity (IFRS)</b>	<b>3,974,868</b>	<b>3,905,837</b>
Difference in valuation of technical provisions	36,337	332,018
Differences in reinsurance receivables	35,621	21,394
Differences in Insurance and intermediaries receivables	(40,972)	-
Differences in any other assets not elsewhere shown	-	(748)
Differences in Insurance & intermediaries payables	-	(63,684)
Differences in reinsurance payables	-	(276,411)
Differences in Payables (trade, not insurance)	-	2,885
<b>Own funds (Solvency II)</b>	<b>4,005,854</b>	<b>3,921,291</b>

## E. Capital Management (continued)

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

#### *SCR and MCR*

The below table summarises the capital requirements for the current period comparable to the previous period. Further details can be found in appendices S.25.01.

	2025	2024
	UK£	UK£
<b>SCR</b>	<b>1,565,908</b>	<b>1,845,407</b>
<i>Made up of</i>		
Market risk	320,259	432,606
Underwriting & reserving risk	826,796	783,749
Counterparty default risk	746,643	1,049,110
Operational risk	78,322	78,847
Diversification benefit	(406,112)	(498,905)
<b>MCR</b>	<b>2,261,331</b>	<b>2,358,882</b>
<i>MCR inputs</i>		
Net written premium	2,610,738	2,634,920

The SCR has been calculated using the Solvency II Standard Formula and is subject to supervisory assessment. The Company does not use any simplifications or undertaking specific parameters to calculate the SCR.

The main risks that drive the SCR are underwriting and reserving risk. Underwriting risk stems from the insurance risk that the Group assumes through the course of its normal business activities and is increased by lapse risk associated with future business.

The Company's MCR is subject to the absolute floor of €2.7 million as mandated by EIOPA which is the very minimum amount that an MCR may be regardless of the results of the MCR calculation. Absent the mandated absolute floor, the Company's MCR would have been UK£461,352.

Further details on the calculation of the Company can be found in appendix S.28.01.

## **E. Capital Management (continued)**

### ***E.3 Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement***

This sub-module is not used by the Company.

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

The Company uses only the standard formula.

### ***E.5 Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement***

The Company has fully complied with the SCR and MCR requirement during the period under review.

### ***E.6 Any other information***

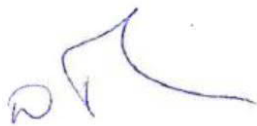
The Company has not identified any other information that it considers material to be disclosed.

## Directors' Statement

We acknowledge our responsibility for preparing the SFCR in all material respects in accordance with the Insurance and Reinsurance Services and other Related Issues Law of 2016, the Commission Delegated Regulation (EU) 2015/35, the Commission Delegated Regulation (EU) 2016/467, the Commission Delegated Regulation (EU) 2019/981, the relevant EU Commission's Implementing Regulations and the Relevant Order of the Superintendent of Insurance and the Solvency II Regulations (collectively "the Framework").

We are satisfied that:

- a) throughout the financial year in question, the Company has complied in all material respects with the Framework as applicable to the insurer; and
- b) it is reasonable to believe that the Company has continued to comply subsequently and will continue to comply in future.



Daniel John Evans

For and on behalf of The United Kingdom Freight Demurrage and Defence Insurance  
(Europe) Limited

27 May 2025

## **Independent Auditor's Report**

**To the Board of Directors of The United Kingdom Freight Demurrage and Defence Insurance (Europe) Ltd**

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

### **Opinion**

We have audited the following Solvency II Quantitative Reporting Templates ("QRTs") contained in Annex I to Commission Implementing Regulation (EU) No 2023/895 of 4 April 2023, of The United Kingdom Freight Demurrage and Defence Insurance (Europe) Ltd (the "Company"), prepared as at 20 February 2025:

- S.02.01.02 - Balance sheet
- S.17.01.02 - Non-Life Technical Provisions
- S.23.01.01 - Own funds
- S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula
- S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

The above QRTs are collectively referred to for the remainder of this report as "the relevant QRTs of the Solvency and Financial Condition Report".

In our opinion, the information in the relevant QRTs of the Solvency and Financial Condition Report as at 20 February 2025 is prepared, in all material respects, in accordance with the Insurance and Reinsurance Services and other Related Issues Law of 2016 as amended, the Commission Delegated Regulation (EU) 2015/35 as amended, the relevant EU Commission's Implementing Regulations and the relevant Orders of the Superintendent of Insurance (collectively "the Framework").

### **Basis for Opinion**

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the relevant QRTs of the Solvency and Financial Condition Report section of our report. We are independent of the Company in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) together with the ethical requirements that are relevant to our audit of the relevant QRTs of the Solvency and Financial Condition Report in Cyprus, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

## **Emphasis of Matter**

We draw attention to the 'Valuation for solvency purposes' and 'Capital Management' sections of the Solvency and Financial Condition Report, which describe the basis of preparation. The Solvency and Financial Condition Report is prepared in compliance with the Framework, and therefore in accordance with a special purpose financial reporting framework. As a result, the Solvency and Financial Condition Report may not be suitable for another purpose. Our opinion is not modified in respect of this matter.

## **Other information**

The Board of Directors is responsible for the Other information. The Other information comprises certain narrative sections and certain QRTs of the Solvency and Financial Condition Report as listed below:

Narrative sections:

- Business and performance
- Valuation for solvency purposes
- Capital management

QRTs (contained in Annex I to Commission Implementing Regulation (EU) No 2023/895 of 4 April 2023):

- S.05.01.02 - Premiums, claims and expenses by line of business
- S.05.02.01 - Premiums, claims and expenses by country
- S.19.01.21 - Non-Life insurance claims

Our opinion on the relevant QRTs of the Solvency and Financial Condition Report does not cover the Other information listed above and we do not express any form of assurance conclusion thereon.

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

## **Responsibilities of the Board of Directors for the Solvency and Financial Condition Report**

The Board of Directors is responsible for the preparation of the Solvency and Financial Condition Report in accordance with the Framework.

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

In preparing the Solvency and Financial Condition Report, the Board of Directors is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Board of Directors either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

The Board of Directors is responsible for overseeing the Company's financial reporting process.

### **Auditor's Responsibilities for the Audit of the relevant QRTs of the Solvency and Financial Condition Report**

Our objectives are to obtain reasonable assurance about whether the relevant QRTs of the Solvency and Financial Condition Report are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the Solvency and Financial Condition Report.

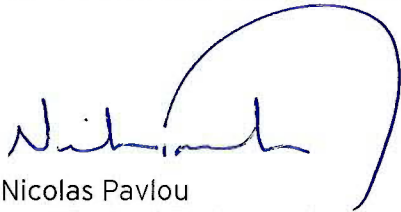
As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the relevant QRTs of the Solvency and Financial Condition Report, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- Evaluate the appropriateness of the basis of preparation used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors.
- Conclude on the appropriateness of the Board of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the Solvency and Financial Condition Report or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

We communicate with the Board of Directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

## Other Matter

Our report is intended solely for the Board of Directors of the Company and should not be used by any other parties. We do not, in giving this opinion, accept or assume responsibility for any other purpose or to any other person to whose knowledge this report may come to.



Nicolas Pavlou  
Certified Public Accountant and Registered Auditor  
for and on behalf of

Ernst & Young Cyprus Limited  
Certified Public Accountants and Registered Auditors

Nicosia  
27 May 2025

# The United Kingdom Freight Demurrage and Defence Insurance (Europe) Limited

## Solvency and Financial Condition Report

### Disclosures

20 February

**2025**

(Monetary amounts in GBP thousands)

## General information

Undertaking name	The United Kingdom Freight Demurrage and Defence Insurance (Europe) Limited
Undertaking identification code	213800USL6J47FESOC07
Type of code of undertaking	LEI
Type of undertaking	Non-Life insurance undertakings
Country of authorisation	CY
Language of reporting	en
Reporting reference date	20 February 2025
Currency used for reporting	GBP
Accounting standards	IFRS
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

## List of reported templates

S.02.01.02 - Balance sheet

S.04.05.21 - Premiums, claims and expenses by country: Non-life insurance and reinsurance obligations

S.05.01.02 - Premiums, claims and expenses by line of business

S.17.01.02 - Non-Life Technical Provisions

S.19.01.21 - Non-Life insurance claims

S.19.01.21 - Non-Life insurance claims

S.23.01.01 - Own Funds

S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula

S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

## S.02.01.02

## Balance sheet

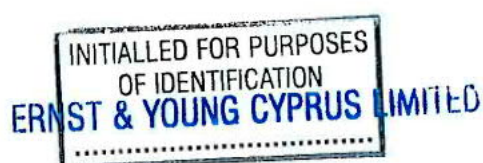
		Solvency II value
		C0010
<b>Assets</b>		
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	3,987
R0080	<i>Property (other than for own use)</i>	0
R0090	<i>Holdings in related undertakings, including participations</i>	0
R0100	<i>Equities</i>	0
R0110	<i>Equities - listed</i>	
R0120	<i>Equities - unlisted</i>	
R0130	<i>Bonds</i>	1,234
R0140	<i>Government Bonds</i>	1,234
R0150	<i>Corporate Bonds</i>	0
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	0
R0180	<i>Collective Investments Undertakings</i>	2,753
R0190	<i>Derivatives</i>	
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	
R0230	Loans and mortgages	0
R0240	<i>Loans on policies</i>	
R0250	<i>Loans and mortgages to individuals</i>	
R0260	<i>Other loans and mortgages</i>	
R0270	Reinsurance recoverables from:	1,330
R0280	<i>Non-life and health similar to non-life</i>	1,330
R0290	<i>Non-life excluding health</i>	1,330
R0300	<i>Health similar to non-life</i>	0
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	0
R0320	<i>Health similar to life</i>	
R0330	<i>Life excluding health and index-linked and unit-linked</i>	
R0340	<i>Life index-linked and unit-linked</i>	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	49
R0370	Reinsurance receivables	90
R0380	Receivables (trade, not insurance)	
R0390	Own shares (held directly)	
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	243
R0420	Any other assets, not elsewhere shown	26
R0500	<b>Total assets</b>	5,725



## S.02.01.02

## Balance sheet

		Solvency II value
<b>Liabilities</b>		<b>C0010</b>
R0510	Technical provisions - non-life	1,502
R0520	<i>Technical provisions - non-life (excluding health)</i>	1,502
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	1,267
R0550	<i>Risk margin</i>	234
R0560	<i>Technical provisions - health (similar to non-life)</i>	0
R0570	<i>TP calculated as a whole</i>	0
R0580	<i>Best Estimate</i>	0
R0590	<i>Risk margin</i>	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	<i>Technical provisions - health (similar to life)</i>	0
R0620	<i>TP calculated as a whole</i>	
R0630	<i>Best Estimate</i>	
R0640	<i>Risk margin</i>	
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	0
R0660	<i>TP calculated as a whole</i>	
R0670	<i>Best Estimate</i>	
R0680	<i>Risk margin</i>	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	<i>TP calculated as a whole</i>	
R0710	<i>Best Estimate</i>	
R0720	<i>Risk margin</i>	
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	
R0790	Derivatives	
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	34
R0830	Reinsurance payables	0
R0840	Payables (trade, not insurance)	183
R0850	Subordinated liabilities	0
R0860	<i>Subordinated liabilities not in BOF</i>	
R0870	<i>Subordinated liabilities in BOF</i>	0
R0880	Any other liabilities, not elsewhere shown	
R0900	<b>Total liabilities</b>	1,719
R1000	<b>Excess of assets over liabilities</b>	4,006



S.04.05.21

Premiums, claims and expenses by country: Non-life insurance and reinsurance obligations

R0010

Premiums written (gross)

R0020 Gross Written Premium (direct)

R0021 Gross Written Premium (proportional reinsurance)

R0022 Gross Written Premium (non-proportional reinsurance)

Premiums earned (gross)

R0030 Gross Earned Premium (direct)

R0031 Gross Earned Premium (proportional reinsurance)

R0032 Gross Earned Premium (non-proportional reinsurance)

Claims incurred (gross)

R0040 Claims incurred (direct)

R0041 Claims incurred (proportional reinsurance)

R0042 Claims incurred (non-proportional reinsurance)

Expenses incurred (gross)

R0050 Gross Expenses Incurred (direct)

R0051 Gross Expenses Incurred (proportional reinsurance)

R0052 Gross Expenses Incurred (non-proportional reinsurance)

Home Country	Top 5 countries (by amount of gross premiums written): non-life				
	DE	NL	GR	FR	IT
C0010	C0020	C0021	C0022	C0023	C0024
401	637	513	224	188	197
391	637	518	224	188	198
28	127	201	187	72	119
81	129	104	45	38	40

### Premiums, claims and expenses by line of business

[illegible]

S.17.01.02  
Non-Life Technical Provisions

Direct business and accepted proportional reinsurance																	Accepted non-proportional reinsurance				Total Non-Life obligation			
Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance									
C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180								
										0							0							
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole																	0							
Technical provisions calculated as a sum of BE and RM																								
Best estimate																								
Premium provisions																								
R0060	Gross																						-851	
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default																							-566
R0150	Net Best Estimate of Premium Provisions																							-286
Claims provisions																								
R0160	Gross																							2,119
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default																							1,895
R0250	Net Best Estimate of Claims Provisions																							223
Total best estimate - gross																								1,267
Total best estimate - net																								-62
Risk margin																								234
Technical provisions - total																								1,502
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total																								1,330
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total																								172



### Non-Life insurance claims

Accident year / underwriting year	Accident Year
-----------------------------------	---------------

(absolute amount)

**Gross Undiscounted Best Estimate Claims Provisions**  
(absolute amount)

[illegible]

### Non-Life insurance claims

Accident year / underwriting year	Underwriting Year
-----------------------------------	-------------------

Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
	Development year										In Current year	Sum of years (cumulative)	
	0	1	2	3	4	5	6	7	8	9	10 & +		
Prior											0	0	0
-9	0	0	0	0	0	0	0	0	0	0		0	0
-8	0	0	0	0	0	0	0	0	0			0	0
-7	0	0	0	0	0	0	0	0				0	0
-6	0	0	0	0	0	0	0					0	0
-5	0	0	0	0	0	0						0	0
-4	0	0	0	0	0							0	0
-3	0	0	0	0								0	0
-2	0	0	0									0	0
-1	0	0										0	0
0	0											0	0
											Total	0	0

	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
Year	Development year											Year end (discounted data)
	0	1	2	3	4	5	6	7	8	9	10 & +	
Prior												0
-9	0	0	0	0	0	0	0	0	0	0		0
-8	0	0	0	0	0	0	0	0	0			0
-7	0	0	0	0	0	0	0	0				0
-6	0	0	0	0	0	0	0					0
-5	0	0	0	0	0	0						0
-4	0	0	0	0	0							0
-3	0	0	0	0								0
-2	0	0	0									0
-1	0	0										0
0	0											0
												Total

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
20	20		0	
3,640	3,640		0	
0	0		0	
0		0	0	0
0	0			
0		0	0	0
0		0	0	0
346	346			
0		0	0	0
0				0
0	0	0	0	0
0				
0	0	0	0	0

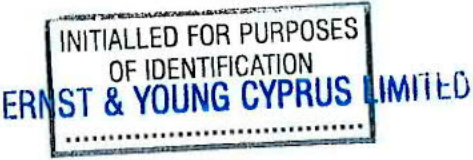
0			
0			
0			
0			
0			
0			
0			
0			
0			
0		0	0

4,006	4,006	0	0	0
4,006	4,006	0	0	
4,006	4,006	0	0	0
4,006	4,006	0	0	

1,566
2,261
255.82%
177.15%

C0060
4,006
0
3,660
0
346

851
851



## S.25.01.21

## Solvency Capital Requirement - for undertakings on Standard Formula

R0010 Market risk  
 R0020 Counterparty default risk  
 R0030 Life underwriting risk  
 R0040 Health underwriting risk  
 R0050 Non-life underwriting risk  
 R0060 Diversification

R0070 Intangible asset risk

R0100 **Basic Solvency Capital Requirement**

**Calculation of Solvency Capital Requirement**

R0130 Operational risk  
 R0140 Loss-absorbing capacity of technical provisions  
 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**  
 R0210 Capital add-ons already set  
 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**

**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**

R0590 Approach based on average tax rate

**Calculation of loss absorbing capacity of deferred taxes**

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

Gross solvency capital requirement	USP	Simplifications
C0110	C0090	C0120
320		
747		
0		
0		
827		
-406		

**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

C0100
78
0
0
1,566
0
0
0
0
0
1,566

0
0
0
0
0

Yes/No
C0109
0

LAC DT
C0130
0
0
0
0
0

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## 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

R0010 MCR<sub>NL</sub> Result

C0010

32

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

## Linear formula component for life insurance and reinsurance obligations

R0200 MCR<sub>L</sub> Result

C0040

0

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

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

C0070

32

1,566

705

391

391

2,261

2,261

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

C0020

C0030

0	
0	
0	
0	
0	
0	
0	
0	
0	
0	481
0	
0	
0	
0	
0	

Net (of reinsurance /SPV) best estimate and TP calculated as a whole	Net (of reinsurance /SPV) total capital at risk
--	---

C0050

C0060


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