

Solvency and Financial Condition Report

For the year ended 20 February 2021

The United Kingdom Freight Demurrage and Defence Association
Limited

Table of Contents

Summary	1
A. Business and Performance	3
A.1. Business	3
A.2. Underwriting Performance.....	4
A.3. Investment Performance	6
A.4. Performance from other Activities.....	7
A.5. Any other Information	7
B. System of Governance	9
B.1. General Information on the System of Governance.....	9
B.2. Fit and Proper Requirements.....	11
B.2. Fit and Proper Requirements.....	12
B.3. Risk Management System.....	13
B.4. Internal Control System	17
B.5. Internal Audit Function	19
B.6. Actuarial Function.....	20
B.7. Outsourcing	21
B.8. Any Other Information.....	22
C. Risk Profile.....	23
C.1. Underwriting Risk.....	23
C.2. Market Risk.....	24
C.3. Credit Risk.....	25
C.4. Liquidity Risk.....	26
C.5. Operational Risk.....	27
C.6. Other Material Risks	27
C.7. Stress and scenario testing.....	28
C.8. Any Other Information.....	28
D. Valuation for Solvency Purposes	29
D.1. Assets	29
D.2. Technical Provisions	32
D.3. Other Liabilities	36
D.4. Alternative Methods of Valuation.....	37
D.5. Any Other Information.....	37
E. Capital Management.....	38
E.1 Own funds	38
E.2 Solvency Capital Requirement and Minimum Capital Requirement.....	39
E.3 Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement	40
E.4 Differences between the standard formula and any internal model used.....	40
E.5 Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement	40
E.6 Any other information	40
Directors' Statement	41
Report of the external independent auditor to the Directors of The United Kingdom Freight Demurrage and Defence Association Limited	42
Appendix – UKFDD Solo information.....	47
Appendix – Quantitative Reporting Templates	53

The United Kingdom Freight Demurrage and Defence Association Limited

Summary

This report covers the Business and Performance of The United Kingdom Freight Demurrage and Defence Association Limited (“UKFDD” (solo)). Collectively, the consolidated position is referred to as “the Group”. It also covers the System of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management under the requirements of the Solvency 2 regime.

The ultimate Administrative Body that has the responsibility for all of these matters is the Group’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 it reports its results in Pounds Sterling.

For solvency purposes the Group uses the standard formula to calculate its Solvency Capital Requirement (“SCR”) and as a mutual insurer of the marine legal expense risks of its Members, the Group’s insurance business is classified as legal expenses insurance for Solvency 2 purposes. All business is underwritten from the United Kingdom and Cyprus, however Members are dispersed internationally.

During the year under review the Group has shown a loss for the year of £0.06 million (2020: surplus £0.15 million) as reported in its annual financial statements under UK GAAP. The loss for the year was mainly the result of increased claims and foreign currency losses mostly offset by increased premium levels. The loss for the year resulted in a free reserve of £4.73 million (2020: £4.79 million) which is further increased by £1.8 million (2020: reduced by £0.50 million) as a result of unmatured forward currency contracts that are included in the Group’s hedging reserve and forms part of the Group’s capital reserves.

This is the fifth year that the Group has returned premium to its Membership by way of a continuity credit scheme. During the year under review the Group has seen an increase in premium levels driven in part by a weakening in Sterling. To manage this risk the Group hedges its US Dollar premium income through the use of forward currency.

For solvency purposes the Group’s total own funds stood at £11.6 million which are supported by and include ancillary own funds, as approved by the Group’s regulator and represent the capital benefit associated with UKFDD’s ability to make a contingency call on its mutual Members. This resulted in eligible own funds of £11.6 million against an SCR of £4.2 million (276% coverage) and eligible own funds of £9.5 million against an Minimum Consolidated Group Solvency Capital Requirement of £4.5 million (210% coverage).

Summary (continued)

For SCR purposes UKFDD (solo basis) eligible own funds stood at £11.6 million (2020: 10.7 million) to cover the SCR standing at £4.4 million (2020: £5.8 million) resulting in a capital adequacy ratio of 267% (2020: 185%). In terms of UKFDD (Solo basis) MCR, eligible own funds stood at £9.5 million (2020: £7.8 million) against an MCR requirement of £2.2 million (2020: £2.2 million) resulting in coverage of the MCR of 420% (2020: 364%)

During the year The United Kingdom Freight Demurrage and Defence Insurance (Europe) Limited (“UKDE”), which is fully owned by UKFDD, obtained its insurance license from the Cyprus Ministry of Finance and has started writing insurance business for EU policyholder thereby creating an insurance Group. As such this is the first year that a Group SFCR is presented and therefore no comparative figures are presented for Group amounts on a Solvency II basis.

The emergence and spread of COVID-19, or the so-called Coronavirus, could have an impact on the Group. As a service organisation, the Group is able to continue to service its Members remotely, and therefore the disruption caused by COVID-19 has not materially impacted the Group’s ability to operate on an ongoing basis. Further details can be found in section A.5 of the Solvency and Financial Condition Report.

A. Business and Performance

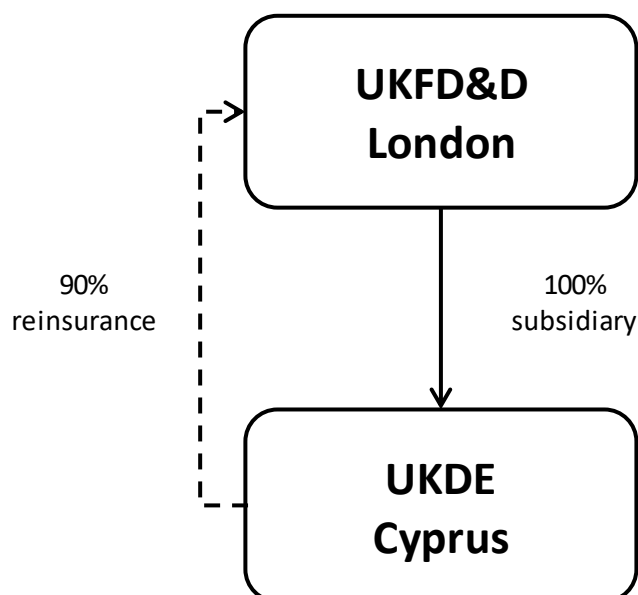
A.1. Business

Corporate information

UKFDD is incorporated in the United Kingdom as a company limited by guarantee without share capital. In the event of the company's liquidation the net assets of UKFDD are to be distributed in proportion to the amount of contributions paid by Members during the preceding six years.

Group structure

At the year-end date, UKFDD was the parent company of the Group. 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:



Regulation

The Group's regulators are:

- Prudential Regulation Authority ("PRA"): 20 Moorgate, London, EC2R 6DA, United Kingdom
- Financial Conduct Authority ("FCA"): 25 the North Colonnade, London, E14 5HS, United Kingdom.

UKDE is regulated by the Superintendent of Insurance in Cyprus located at Michael Karaoli & Gregori Afxentiou, 1439, Nicosia, Cyprus.

External auditors

The Group's external auditors are BDO LLP: 55 Baker Street, London W1U 7EU.

A. Business and Performance (continued)

Overview

The Group carries on the business of mutual insurance of its Members and policyholders against legal costs and expenses as defined in the Rules of the Association. UKDE reinsures 90% of its business to UKFDD which in turn reinsures 90 per cent of its business with The United Kingdom Defence Insurance Association (Isle of Man) Limited (“UKDIA”). This SFCR presents only the results of the Group, and excludes the results of UKDIA.

For Solvency 2 purposes the Group business is classified as legal expense insurance.

The number of ships entered in the Group at the year-end on 20 February 2021 was 3,766 (3,061 owned and 705 chartered), compared with 3,721 (3,043 owned and 678 chartered) on 20 February 2020. In terms of tonnage, the Group insured 210.9 million tonnes at 20 February 2021 compared to 209.6 million tonnes at 20 February 2020.

A.2. Underwriting Performance

All of the Group business is underwritten from the UK and Cyprus, although Members are internationally dispersed. The Group writes the insurance of legal expenses. Because the Group covers movable risk, geographical analysis of location of risk is not feasible. For information on underwriting performance by material geographical area refer to Quantitative Reporting Template (“QRT”) S.05.02.01 which shows a geographical analysis by Member location and forms part of the Group’s annual regulatory reporting requirement.

For the year ended 20 February 2021, the Group produced an underwriting profit of £1.7 million (2020: £0.1 million) as detailed further in the table below which is a summary of the Group’s technical account reported on a UK GAAP basis.

Summary of technical account as at 20 February 2021:

	2021	2020
	£000s	£000s
Income and expenditure		
Gross written premium	19,270	16,835
Outward reinsurance premium	(16,617)	(14,471)
Agreed discount on reinsurance premium	9,376	7,641
Claims incurred, net of reinsurance	(5,644)	(5,270)
Net operating expenses	(4,695)	(4,634)
Balance on the technical account	<u>1,690</u>	<u>101</u>

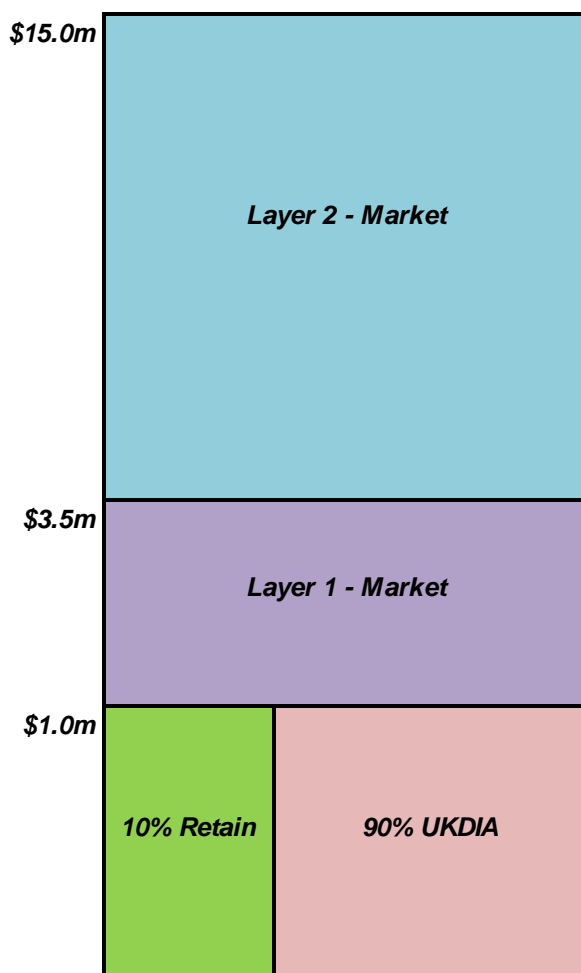
A. Business and Performance (continued)

The underwriting profit stems from an increase in the Group's gross written premium and agreed discount on reinsurance premium given a weaker Sterling at the time of writing premium.

Risk mitigation

The Group writes policies with a maximum policy limit of \$15 million. The first \$1.0 million of claims is retained by the Group after which claims of \$14.0 million excess of the \$1.0 million retention are reinsured on an excess of loss basis. Retained claims are further ceded to the Group's quota share reinsurer UKDIA on a 90% quota share basis. This arrangement is consistent with the prior year.

The below table illustrates the reinsurance programme of the Group:



Exposure to reinsurance counterparties within layers 1 and 2 is mitigated by the Group placing its external reinsurances with counterparties rated A- or better.

A. Business and Performance (continued)

On its 90% reinsurance programme, 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.

Most notably, given that UKDE had received its license to write insurance business, EU policies are now written by UKDE. UKDE cedes 90% of risks below \$1 million and 100% of risks in excess of \$1 million to UKFDD.

In addition, and as further discussed in the risk management section, the Group has continued the practice of hedging its future premium income received in USD against fluctuations in the GBP / USD exchange rate. Counterparties on hedging contracts are reputable banking institutions.

Other than the above, there have been no material changes to the Group's underwriting risk mitigation programme during the current year.

A.3. Investment Performance

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

Invested assets split by asset class as at 20 February 2021

	2021	2020
	£000s	£000s
Asset class		
Short term deposit funds	653	746
Foreign exchange security deposit	3,855	3,795
Cash and cash equivalents	4,025	4,045
Derivative financial instruments	2,109	(494)
	10,642	8,092
	10,642	8,092

The following table details the Group's investment income by asset class as reported in the Group's UK GAAP financial statements:

A. Business and Performance (continued)

Investment return split by asset class as at 20 February 2021

Asset class	2021	2020
	£000s	£000s
Bank deposits	10	47
Short term deposit funds	1	33
	<u>11</u>	<u>80</u>

Expenses related to the management of these investments were £0.02 million for the year (2020: £0.02 million).

As previously mentioned, the Group uses forward currency contracts to hedge the foreign exchange risks that it is exposed to as a result of future income being received in US Dollars. Future premium income is regarded as a highly probable forecast transaction and is designated as a hedged item. Forward currency contracts in relation to the hedged item are designated as a hedging instrument.

The effective portion of changes in the fair value of derivatives that are designated and qualify as cash flow hedges of a highly probable forecast transaction is recognised directly within equity as other comprehensive income in the UK GAAP financial statements. The gain or loss relating to any ineffective portion is recognised immediately in the consolidated income and expenditure account.

A.4. Performance from other Activities

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

A.5. Any other Information

Overall the Group produced an accounting loss of £0.06 million (2020: profit of £0.15 million) for the year resulting in an accumulated surplus of £4.73 million (2020: £4.79 million) in the UK GAAP financial statements. The UK GAAP financial statements additionally showed a cash flow hedging reserve of £1.78 million (2020: negative cash flow hedging reserve of £0.50 million) which is the value attributed to derivatives designated as cash flow hedges. This resulted in total comprehensive income for the year of £2.22 million (2020: £0.10 million).

A. Business and Performance (continued)

Impact of COVID-19 on the Group

COVID-19 emerged in December 2019, and was classified as a global pandemic in March 2020. Since the emergence of COVID-19, the Group has not seen any material impact to its business operations. The Group has seen a some cases opened which directly or indirectly relate to COVID-19, however the Group do not consider these claims to be in excess of expectations or to represent a trend of a material increase in claims cost. Operationally, the Group has effectively implemented a remote working arrangements and was able to seamlessly continue to service its Members. From an underwriting point of view, the Group has seen no material defaults in premium obligations and the Group most recent renewal is considered to have been conducted very successfully under remote working conditions. Finally, given that the Group is mostly invested in low risk assets, the Group's invested assets have performed satisfactorily during the past year.

As such, the Group does not consider COVID-19 to have any significant impact on its ability to continue as a going concern.

B. System of Governance

B.1. General Information on the System of Governance

The Board of Directors

Ultimate responsibility for the governance of The Group rests with the Board of Directors. The Group's Directors are generally drawn from senior individuals within the Membership. In practice the Board of Directors comprises 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 Members of the Group. The Directors meet four times a year.

Governance, risk management and internal control and reporting procedures are consistent across all entities within the Group through use of consistent policy and procedural documentation.

The Board of Directors may delegate any of its powers, duties or discretions to committees consisting of such Directors as it sees fit. 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.

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 Group.

Management Fee Committee

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

Strategy Committee

The Strategy Committee considers the Group's future strategy.

Nominations Committee

The Nominations Committee considers the composition of the Board and its Committees.

B. System of Governance (continued)

Key functions

The Managers

The Group has no employees and as such the Board of Directors relies on the Managers for the day-to-day management duties of the Group. 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 Group.

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 Group and have a representative on the Board of Directors.

The Investment Managers

Investment of the Group'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 Group.

Governance Map

The Group maintains a governance map that details the key Senior Manager Functions and Key Functions. The following functions are maintained through the governance map with a prescribed set of responsibilities:

- Chair (Board)
- Chief Executive Officer (Board / Managers)
- Chief Operations (Manager)
- Chief Financial Officer (Managers)
- Chief Risk Officer (Managers)
- Head of Internal Audit (Managers)
- Chair of Audit, Regulatory and Risk Committee (Board)
- Chair of Nominations Committee (Board)
- Chief Actuary (Managers)
- Chief Underwriting Officer (Managers)
- Claims Function (Managers)
- Investment Manager (Managers)
- Compliance Oversight (Managers)
- Money Laundering Officer (Managers)

B. System of Governance (continued)

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 Group 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.

Related party transactions

The Group has no share capital and is controlled by the Members who are also the insureds. The subsequent insurance transactions are consequently deemed to be between related parties, but these are the only transactions between the Group and the Members.

All, but one, of the Directors are current representatives of Member companies and other than the insurance, which is arranged on an arm's length basis, and Member interests of these companies, the Directors have no financial interests in the Group.

The Group reinsures with UKDIA on a 90% quota share basis. All Members of the Group are automatically also Members of UKDIA. However, none of the Directors of the Group are Directors of UKDIA. Additionally, UKDIA operates under a separate governance and operational structure, has its own rulebook, and is therefore not considered to be a related party of the Group.

B.2. Fit and Proper Requirements

The Group has in place a Fit & Proper policy that sets out its approach to the fitness and propriety of the persons responsible for running the Group, including executive senior management and key function holders.

B. System of Governance (continued)

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 Group's affairs effectively.

B.2. Fit and Proper Requirements

The Fit and Proper policy applies to:

- All Directors of the Group;
- 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.

All persons within the scope of the policy are assessed against the requirements of the Senior Managers Certification Regime ("SMCR"). 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 Chair, 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 Group 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.

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 Group 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.

B. System of Governance (continued)

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.

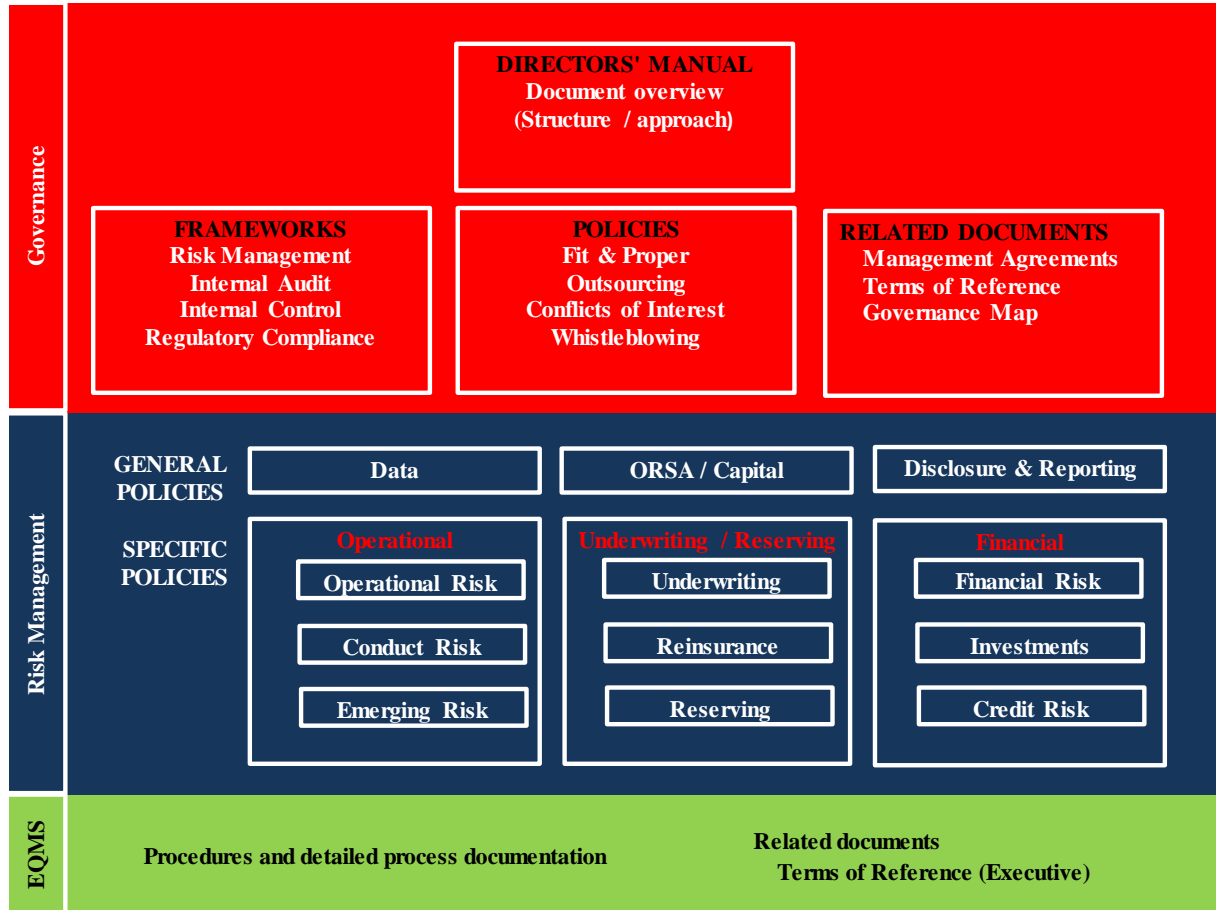
Risk Policies and Procedures

The Group'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.

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.

B. System of Governance (continued)

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



Risk Appetite

The Group'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 Group'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 Group'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.

B. System of Governance (continued)

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 Group. 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 Group's Board of Directors and senior management of the Group 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 Group. The key risks affecting the Group 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 Group prepares an ORSA overview report. The ORSA is the process used by the Group 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 Group's Corporate Planning Process.

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.

The Board of Directors reviews the ORSA and considers appropriate action for the Group 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 Group is adequately capitalised.

B. System of Governance (continued)

Risk Controls

The Group'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 Group'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 Thomas Miller Defence ("TMD") 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 Group's Risk Officer who oversees risk management; provides independent challenge; and has direct access to the Chair of the Audit, Regulatory & Risk Committee. The Risk Management Function maintains an organisation-wide and aggregated view of the risk profile of the Group, 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.4. Internal Control System

Internal control is defined as a continually operating process effected by the Group's Board of Directors, its Audit, Regulatory & Risk Committee, the Managers, all staff and systems and designed to support the Group 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.

B. System of Governance (continued)

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 Chair 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.

Compliance function

The Group 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.

B. System of Governance (continued)

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 Group'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 Group 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.

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.

B. System of Governance (continued)

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.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.

B. System of Governance (continued)

The Actuarial Function is independent of the Group'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 Group'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 2, 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 Group has in place an outsourcing policy which is directed at services or activities which are particularly important or critical to the Group's business (material business activities).

Material business activities include the key functions of the Group'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 Group 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.

Investment management outsourcing

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

B. System of Governance (continued)

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

Internal audit outsourcing

The Group'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

The Group considers no other information material to be disclosed.

C. Risk Profile

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

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

C.1. Underwriting Risk

The Group is a mono-line insurer, underwriting only legal expense insurance for ship owners or operators.

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

Reserve risk is managed by the Group's reserving policy. The Group 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 ORSA process.

Underwriting Risk is mitigated via the Group's reinsurance programme which covers claims in excess of \$1.0 million. Of the \$1.0 million per claim retained by the Group, 90% of the risk is covered by the Group's quota share reinsurer, UKDIA.

Underwriting Risk is most sensitive to an increase in expected claims costs. For example, a 5% increase in the Group's gross loss ratio will reduce the gross accounting surplus for the Group by £0.96 million £0.84 million. A 5% decrease to the loss ratio will have an equal, but opposite effect.

C. Risk Profile (continued)

C.2. Market Risk

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

The Group 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".

Currency risk is a key risk for the Group as it primarily receives its premium income in US Dollars, but much of its outgoings are in Sterling or Euros. The Group uses forward contracts to mitigate this risk. In addition, the Group utilises an investment mandate that matches the currency of its assets and liabilities.

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

As at 20 February 2021	Sterling £'000	US Dollar £'000	Euro £'000	Total £'000
Short term deposit funds	651	2	-	653
Foreign exchange security deposit	3,855	-	-	3,855
Derivative financial instruments	27,343	(25,234)	-	2,109
Reinsurers' share of technical provisions	17,856	4,130	3,098	25,084
Debtors	139	206	40	385
Cash and cash equivalents	3,619	384	22	4,025
Technical provisions	(19,767)	(4,567)	(3,425)	(27,759)
Creditors	(1,497)	(170)	(182)	(1,849)
	<u>32,199</u>	<u>(25,249)</u>	<u>(447)</u>	<u>6,503</u>

C. Risk Profile (continued)

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. 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 Group's annual financial statements. The credit rating bands are provided by independent ratings agencies:

The United Kingdom Freight Demurrage and Defence Association
Limited

C. Risk Profile (continued)

As at 20 February 2021	AAA	AA - A	BBB	Not rated / not readily available	Total
	£'000	£'000	£'000	£'000	£'000
Short term deposit funds	653	-	-	-	653
Foreign exchange security deposit	-	1,310	2,545	-	3,855
Derivative financial instruments	-	1,341	768	-	2,109
Reinsurers' share of technical provisions	-	-	-	25,084	25,084
Debtors	-	-	-	385	385
Cash and cash equivalents	-	4,025	-	-	4,025
Total assets subject to credit risk	653	6,676	3,313	25,469	36,111

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

The Group's exposure primarily relates to its 90% quota share arrangement with UKDIA. The Group benefits from debentures over UKDIA's assets, which mitigates the risk substantially. Exposure to other reinsurance counterparties is mitigated by the Group placing such reinsurances with counterparties rated A- or better.

Exposure to debtors is mainly in respect of calls and premium contributions. This is spread over a large number of Members and counterparties, which mitigates the risk. In addition, the Group carries out financial checks on existing and potential Members. Exposure to bank balances, however, is more concentrated, with two main counterparties and the risk is mitigated 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 Group is unable to make payments as they become due. This is managed by the use of liquid investments and under the terms of the reinsurance agreement to call upon the Group's quota share reinsurer, UKDIA, in the event of a significant outflow of funds. The Group also has the benefit of a legal charge in the form of debentures over UKDIA's investments and other assets.

The following table provides a maturity analysis of the Group'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 Group's annual financial statements:

C. Risk Profile (continued)

As at 20 February 2021	Within 1 year	1 to 5 years	Over 5 years	Total
	£'000	£'000	£'000	£'000
Assets and liabilities				
Short term deposit funds	653	-	-	653
Foreign exchange security deposit	3,855	-	-	3,855
Derivative financial instruments	886	1,223	-	2,109
Reinsurers' share of technical provisions	7,019	14,524	3,541	25,084
Debtors	385	-	-	385
Cash and cash equivalents	4,025	-	-	4,025
Technical provisions	(7,769)	(16,072)	(3,918)	(27,759)
Creditors	(1,849)	-	-	(1,849)
Total	<u>7,205</u>	<u>(325)</u>	<u>(377)</u>	<u>6,503</u>

The amount of gross expected profits included in future premium is as per the Solvency 2 balance sheet is £2.7 million. However, it should be noted that the Solvency 2 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 Group 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 Group considers relevant for reporting.

C. Risk Profile (continued)

C.7. Stress and scenario testing

The Group carries out stress and scenario testing as part of its risk management and ORSA process. For management purposes stress and scenario testing are carried out including the results of UKDIA.

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. The following scenarios are included in the Group's latest ORSA and assessed against the Group's risk corridor:

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. Continued impact of a pandemic
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. War event

Scenario's 1 to 4 highlighted that the Group would not move outside of its risk corridor in any of these scenarios. Scenario's 5 to 8 represents alternative scenarios, which are regarded as reverse stress tests. Whilst these scenarios caused the Group to break out of the bottom of its risk corridor, none of these scenarios caused the Group's capital resources to fall below its 1-in-200 capital requirement.

C.8. Any Other Information

The Group 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 2 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 2 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 Group prepares its financial statements under UK GAAP and FRS 102 and 103.

Given that this is the first year that Solvency 2 figures are presented on a Group basis, no comparative figures are shown.

The Solvency 2 balance sheet is presented in S.02.01.02. A summary of assets is shown in the table below.

Valuation of the Group’s assets as at 20 February 2021:

	2021	
	Solvency 2	UK GAAP
	£000s	£000s
Investments	3,198	3,198
Derivatives	2,109	2,109
Reinsurance share of technical provisions	20,387	25,084
Insurance receivables	169	262
Receivables, trade not insurance	72	72
Cash and cash equivalents	5,335	5,335
Any other assets not elsewhere shown	50	50
	31,320	36,110

The above table presents amounts at Solvency 2 and UK GAAP valuation bases respectively. For classification purposes the Solvency 2 classification of amounts has been used. Most notably, certain amounts recognised as investments under Solvency 2 would be recognised as cash and cash equivalents under UK GAAP.

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

D. Valuation for Solvency Purposes (continued)

Investments

Investments are carried at market value. Market value is calculated using the bid price at the close of business on the balance sheet date. The market value of foreign currency investments is translated at the rate of exchange ruling at the balance sheet date.

Fair values of investments traded in active markets are measured at bid price. Where there is no active market, fair value is measured by reference to other factors such as independent valuation reports.

A financial instrument is regarded as quoted in an active market if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. If the above criteria are not met, the market is regarded as being inactive.

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

Derivatives – forward currency contracts

Derivatives are initially recognised at fair value on the date on which a derivative contract is entered into and are subsequently re-measured at their fair value. All derivatives are carried as assets when the fair value is positive and as liabilities when the fair value is negative.

The fair value of foreign exchange forward contracts is based on current forward exchange rates.

The Group currently has a number of forward currency contracts that relate to hedging the currency exposure on future premiums that are not recognised on the GAAP balance sheet. These are recognised on the Solvency 2 balance sheet.

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

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.

Deposits other than Cash equivalents

These amounts represent foreign exchange security deposits and are carried at market value in accordance with the valuation methodology of investments noted above.

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

D. Valuation for Solvency Purposes (continued)

Receivables, trade not insurance

This balance includes sundry, short term receivable 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 Group's financial statements.

Insurance 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 reviewed annually for impairment.

When these amounts are not yet due, they are included as a future cash flow in the calculation of technical provisions for Solvency 2 purposes as further detailed in D.2. This is materially different to statutory account requirements which require these balances to be presented separately on the face of the balance sheet whether they are due or not yet due.

Cash and cash equivalents

Cash and cash equivalents include cash at bank or in hand, deposits held at call with banks and other short term highly liquid investments. 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 Group'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 Group's financial statements.

D. Valuation for Solvency Purposes (continued)

D.2. Technical Provisions

Net technical provisions as at 20 February 2021

	2021
	£000s
Gross best estimate	19,861
Risk margin	221
Reinsurance best estimate	<u>(20,387)</u>
Net technical provisions	<u>(305)</u>

The Group'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 2 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 Group 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 Group 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.

D. Valuation for Solvency Purposes (continued)

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).

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 Group 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 Group uses a variety of estimation techniques based upon statistical analyses of historical experience which assumes past trends can be used to project future developments.

D. Valuation for Solvency Purposes (continued)

In particular the following represents the main sources of uncertainty that may impact the outcome of the Group'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 Group's provision for Events not in Data ("ENID").
- Uncertainty surrounding the development and cash flow patterns may impact the outcome of the Group's technical provisions.
- Currency and exchange rates are inherently uncertain and may impact the outcome of the final technical provisions amount.

Differences between GAAP and Solvency 2 technical provisions

A reconciliation of UK GAAP technical provisions to Solvency 2 technical provisions is shown in the table below:

	<i>note</i>	Gross £000s	RI £000s	Net £000s
UK GAAP technical provisions		27,759	25,084	2,675
Eliminate contingency margin	1	(5,725)	(5,152)	(573)
Reallocation of amounts not yet due	2	(93)	(83)	(10)
Adjustment to expense management reserve	3	239	215	24
Provision for contracts bound but not incepted	4	(2,700)	(10)	(2,690)
Reinsurance counterparty default adjustment	5	-	(1)	1
ENID adjustment	6	342	310	32
Effects of discounting	7	39	24	14
Solvency 2 technical provisions before risk margin		19,861	20,387	(527)
Risk Margin	1	221	-	221
Total Solvency 2 technical provisions		20,082	20,387	(306)

Notes

1. Contingency margin and Solvency 2 risk margin

Since the Solvency 2 technical provisions figure is a best estimate, margins for prudence are removed under the Solvency 2 valuation methodology. The Solvency 2 risk margin is intended to represent a notional market value adjustment as discussed above.

D. Valuation for Solvency Purposes (continued)

2. Reallocation of premiums not yet due

Under Solvency 2 valuation methodologies, all future cash flows are included in the calculation of technical provisions. More specifically, any amount not yet due shall be included as a future cash inflow under the calculation of Solvency 2 technical provisions. As a result, any amounts not yet due on the UK GAAP balance sheet is reallocated from receivable premium to technical provisions on the Solvency 2 balance sheet.

3. Adjustment to expense management reserve

Unlike UK GAAP, Solvency 2 recognises all expense cash flows incurred in servicing insurance obligations. This includes both direct and overhead expenses, as well as investment management expenses. As such, an adjustment is necessary.

4. Provision for contracts bound but not incepted

Solvency 2 valuation methodology requires contracts to be recognised when the insurer becomes party to the insurance contract. Usually, an undertaking becomes a party of the contract when the contract between undertaking and policyholder is legally formalised.

Nearly all of the Group's policies are coterminous with its financial year. The consequence is that nearly a full year's worth of business is recognised as Bound But Not Incepted ("BBNI") business. A provision on the Solvency 2 balance sheet, known as the "premium provision", is thus made for future premiums, claims and expenses that relate to BBNI business.

5. Reinsurance counterparty default adjustment

For the Solvency 2 balance sheet, amounts recoverable from reinsurance counterparties must be adjusted for the expected losses due to counterparty default. This adjustment approximates the expected present value of the losses in the event of default, weighted by the probability of default for each counterparty. Under current accounting bases a provision for bad debts is only made where there is objective evidence that a counterparty may default on its obligation.

There is no expected reinsurance default in respect of the amounts recoverable from the Group's quota share reinsurer, UKDIA, due to debentures which the Group has over UKDIA's assets.

6. Events not in data

Solvency 2 requires that all possible outcomes are allowed for when setting the technical provisions. Therefore, an additional provision needs to be made for "events not in data", i.e. potential adverse claims outcomes that have not been observed to date and hence are not taken into account in assessing the claims provisions.

D. Valuation for Solvency Purposes (continued)

7. Effects of discounting

Since Solvency 2 technical provisions take into account the time value of money, an adjustment is made for the discounting of all future cash flows, based on risk-free interest rates.

D.3. Other Liabilities

Valuation of the Group's liabilities as at 20 February 2021

	2021	
	Solvency 2 £000s	UK GAAP £000s
Technical provisions	20,082	27,759
Insurance & intermediaries payables	232	232
Reinsurance payables	1,115	1,198
Payables, trade not insurance	422	422
	<u>21,851</u>	<u>29,611</u>

The above table presents amounts at Solvency 2 and UK GAAP valuation bases respectively. For classification purposes the Solvency 2 classification of amounts has been used.

The Group's liabilities are valued using the following principles:

Derivatives

Further detail on the Group's valuation policy for derivatives may be found in D.1.

Technical provisions

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

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.

D. Valuation for Solvency Purposes (continued)

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 Group'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 Group'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 Group's financial statements.

D.4. Alternative Methods of Valuation

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

D.5. Any Other Information

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

E. Capital Management

E.1 Own funds

All amounts are in thousands of pounds unless otherwise stated

	2021
SCR ratio	276%
SCR	4,185
Eligible own funds	<u>11,563</u>
Excess	7,378
Minimum Consolidated Group SCR ratio	210%
Minimum Consolidated Group SCR	4,510
Eligible own funds	<u>9,471</u>
Excess	4,961
Tier 1 basic own funds	9,471
Tier 2 ancillary own funds	<u>2,092</u>

As a mutual insurer with no share capital the Group's capital structure consists of two types of own funds:

1. 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 are shown net of the Group's cash flow hedging reserve and contains no significant restrictions affecting the availability and transferability of these own funds.

2. The PRA has granted an approval for a method of calculation of ancillary own funds ("AOF") to UKFDD, by way of contingency calls. The method which results in AOFs of £2.1 million has been approved for a period of 4 years.

Under the Solvency 2 regulations, up to 50% of the SCR may be covered by these funds.

E. Capital Management (continued)

Information, objectives, policies and processes for managing own funds

The Group's objective is that capital resources should exceed the Group's regulatory requirements. The Group 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 UK GAAP reserves to Solvency 2 own funds.

	2021 £000s
UK GAAP reserves	6,500
Solvency 2 gross technical provisions adjustment	7,677
Of which amounts reallocated from UK GAAP balance sheet to technical provisions	(9)
Solvency 2 Reinsurance technical provisions adjustment	(4,697)
Total Solvency 2 basic own funds	<u>9,471</u>

The most material adjustment to reserves is as a result of the differences in valuation of technical provisions which has been further discussed in D.2.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

SCR

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

	2021 £000s
SCR	4,185
<i>Made up of</i>	
Market risk	2,758
Underwriting & reserving risk	1,325
Counterparty default risk	525
Operational risk	596
Diversification benefit	(1,018)

The SCR has been calculated using the Solvency 2 Standard Formula and is subject to supervisory assessment. The Group does not use any simplifications or undertaking specific parameters to calculate the SCR.

E. Capital Management (continued)

The main risks that drive the SCR are market risk and underwriting and reserving risk. Market risk arise mainly as a result of the Group's hedging programme on premium in future years where the hedge has been entered into, but no corresponding premium entry exist at present. 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 Group's Minimum Consolidated Group SCR of £4.5 million exceeds the Group's SCR given that both the entities within the Group has calculated their MCR subject to the absolute floor for the MCR which amounts to £2.25 million for each entity. Absent the mandated absolute floor, the Minimum Consolidate Group SCR would be materially lower.

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 Group.

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

The Group uses only the standard formula.

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

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

E.6 Any other information

The Group 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 PRA Rules and the Solvency 2 Regulations.

We are satisfied that:

- a) throughout the financial year in question, the Group and UKFDD has complied in all material respects with the requirements of the PRA Rules and the Solvency 2 Regulations as applicable to the insurer; and
- b) it is reasonable to believe that the Group and UKFDD has continued to comply subsequently and will continue to comply in future.

C.R. Kendall

For and on behalf of The United Kingdom Freight Demurrage and Defence Association
Limited
27 May 2021

Report of the external independent auditor to the Directors of The United Kingdom Freight Demurrage and Defence Association Limited

Report of the external independent auditor to the Directors of The United Kingdom Freight Demurrage and Defence Association Limited pursuant to Rule 4.1 (2) of the External Audit Chapter of the PRA Rulebook applicable to Solvency II firms.

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

Opinion

Except as stated below, we have audited the following documents prepared by The United Kingdom Freight Demurrage and Defence Association Limited ('UKFDD') and United Kingdom Freight Demurrage and Defence Insurance (Europe) Limited (together 'the Group') as at 20 February 2021:

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Group Solvency and Financial Condition Report of The United Kingdom Freight Demurrage and Defence Association Limited as at 20 February 2021, (**'the Narrative Disclosures subject to audit'**);
- Group templates S.02.01.02, S.23.01.22, S.25.01.22 and S.32.01.22 (**'the Group Templates subject to audit'**); and
- UKFDD Company templates S.02.01.02, S.17.01.02, S.23.01.01, S.25.01.21, S.28.01.01 (**'the Company Templates subject to audit'**).

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

Report of the external independent auditor (continued)

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

- The ‘Business and performance’, ‘System of governance’ and ‘Risk profile’ elements of the Solvency and Financial Condition Report;
- Group templates S.05.01.02, S.05.02.01.
- UKFDD Company templates S.05.01.02, S.05.02.01, S.19.01.21;
- the written acknowledgement by management of their responsibilities, including for the preparation of the solvency and financial condition report (**‘the Responsibility Statement’**).

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

In our opinion, the information subject to audit in the relevant elements of the Group Solvency and Financial Condition and the relevant templates of the Group and UKFDD as at 20 February 2021 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals and determination.

Basis for opinion

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

Report of the external independent auditor (continued)

Conclusions relating to going concern

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

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

Emphasis of Matter – Basis of Accounting

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

Other Information

The Directors are responsible for the Other Information.

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

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

Report of the external independent auditor (continued)

Responsibilities of Directors for the Solvency and Financial Condition Report

The Directors are responsible for the preparation of the Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations which have been modified by the modifications, and supplemented by the approvals and determinations made by the PRA under section 138A of FSMA, the PRA Rules and Solvency II regulations on which they are based.

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

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

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

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

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: <https://www.frc.org.uk/Our-Work/Audit/Audit-and-assurance/Standards-and-guidance/Standards-and-guidance-for-auditors/Auditors-responsibilities-for-audit/Description-of-auditors-responsibilities-for-audit.aspx>

Report of the external independent auditor (continued)

Report on Other Legal and Regulatory Requirements.

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

Alexander Barnes (Senior Statutory Auditor)
For and on behalf of BDO LLP, Statutory Auditor
55 Baker St,
London
W1U 7EU

27 May 2021

Appendix – UKFDD Solo information

The Group has received a waiver from the PRA to present a single Group SFCR that incorporates the result of both the Group and UKFDD on a solo basis. The main part of this SFCR presents the Group results, unless otherwise stated. The results of UKFDD on a solo basis are detailed in this appendix.

UKFDD Solo valuation for Solvency Purposes

1. Solo Assets

	2021		2020	
	Solvency 2 £000s	UK GAAP £000s	Solvency 2 £000s	UK GAAP £000s
Investments	4,052	3,813	6,444	6,444
Derivatives	2,109	2,109	153	153
Reinsurance share of technical provisions	20,387	25,084	25,293	26,460
Insurance receivables	169	262	240	275
Receivables, trade not insurance	73	73	109	109
Cash and cash equivalents	4,757	4,757	2,142	2,142
Any other assets not elsewhere shown	29	29	25	25
	31,576	36,127	34,407	35,608

The above table presents the amounts at Solvency II and FRS valuation bases respectively. For classification purposes, an aggregated Solvency II classification of amounts has been used in order to best demonstrate any valuation differences between the two bases.

Refer to UKFDD appendix S.02.01.02 for a full Solvency II balance sheet.

UKFDD's assets are valued in accordance with the Group's valuation principles further detailed in D.1.

In terms of UKFDD's investment in its subsidiary, UKDE, under FRS this investment is valued at cost less provision for any impairment, whereas on a Solvency II basis, the value of the investment is determined on a look-through valuation basis which considers the underlying Solvency II balance sheet of UKDE.

Appendix – UKFDD Solo information (continued)

UKFDD Technical provisions

	2021 £000s	2020 £000s
Gross best estimate	20,200	24,372
Risk margin	132	170
Reinsurance best estimate	<u>(20,387)</u>	<u>(25,293)</u>
Net technical provisions	<u>(55)</u>	<u>(751)</u>

Refer to UKE QRTs S.17.01.02 and S.19.01.21 in the appendices for further details on technical provisions.

UKE's technical provisions are valued in accordance with the Group valuation principles further detailed in S.2.

Differences between FRS and Solvency II technical provisions

A reconciliation of FRS technical provisions to Solvency II technical provisions is provided below.

	<i>Notes</i>	Gross £000s	Reinsurance Net £000s	£000s
GAAP technical provisions		27,759	25,084	2,675
Eliminate contingency margin	1	(5,725)	(5,153)	(573)
Reallocation of amounts not yet due	2	(93)	(83)	(9)
Adjustment to expense management reserve	3	239	215	24
Provision for contracts bound but not incepted	4	(2,360)	(10)	(2,350)
Reinsurance counterparty default adjustment	5	0	(1)	1
ENID adjustment	6	342	310	32
Effects of discounting	7	38	24	14
Solvency II technical provisions before risk margin		20,200	20,387	(187)
Risk Margin	1	132	0	132
Total Solvency II technical provisions		20,333	20,387	(55)

1. Contingency margin and Solvency 2 risk margin

Since the Solvency 2 technical provisions figure is a best estimate, margins for prudence are removed under the Solvency 2 valuation methodology. The Solvency 2 risk margin is intended to represent a notional market value adjustment as discussed above.

Appendix – UKFDD Solo information (continued)

2. Reallocation of premiums not yet due

Under Solvency 2 valuation methodologies, all future cash flows are included in the calculation of technical provisions. More specifically, any amount not yet due shall be included as a future cash inflow under the calculation of Solvency 2 technical provisions. As a result, any amounts not yet due on the UK GAAP balance sheet is reallocated from receivable premium to technical provisions on the Solvency 2 balance sheet.

3. Adjustment to expense management reserve

Unlike UK GAAP, Solvency 2 recognises all expense cash flows incurred in servicing insurance obligations. This includes both direct and overhead expenses, as well as investment management expenses. As such, an adjustment is necessary.

4. Provision for contracts bound but not incepted

Solvency 2 valuation methodology requires contracts to be recognised when the insurer becomes party to the insurance contract. Usually, an undertaking becomes a party of the contract when the contract between undertaking and policyholder is legally formalised.

Nearly all of UKFDD's policies are coterminous with its financial year. The consequence is that nearly a full year's worth of business is recognised as Bound But Not Incepted ("BBNI") business. A provision on the Solvency 2 balance sheet, known as the "premium provision", is thus made for future premiums, claims and expenses that relate to BBNI business.

5. Reinsurance counterparty default adjustment

For the Solvency 2 balance sheet, amounts recoverable from reinsurance counterparties must be adjusted for the expected losses due to counterparty default. This adjustment approximates the expected present value of the losses in the event of default, weighted by the probability of default for each counterparty. Under current accounting bases a provision for bad debts is only made where there is objective evidence that a counterparty may default on its obligation.

There is no expected reinsurance default in respect of the amounts recoverable from the Group's quota share reinsurer, UKDIA, due to debentures which UKFDD has over UKDIA's assets.

6. Events not in data

Solvency 2 requires that all possible outcomes are allowed for when setting the technical provisions. Therefore, an additional provision needs to be made for "events not in data", i.e. potential adverse claims outcomes that have not been observed to date and hence are not taken into account in assessing the claims provisions.

Appendix – UKFDD Solo information (continued)

7. Effects of discounting

Since Solvency 2 technical provisions take into account the time value of money, an adjustment is made for the discounting of all future cash flows, based on risk-free interest rates.

UKFDD Other liabilities

	2021		2020	
	Solvency 2 £000s	UK GAAP £000s	Solvency 2 £000s	UK GAAP £000s
Derivatives	-	-	647	647
Technical provisions	20,333	27,759	24,542	29,261
Insurance & intermediaries payables	232	232	199	199
Reinsurance payables	1,115	1,198	956	986
Payables, trade not insurance	358	358	207	207
Any other liabilities, not elsewhere shown	68	68	20	20
	22,106	29,616	26,571	31,320

The above table presents amounts using Solvency II and FRS valuation bases respectively. For classification purposes amounts have been aggregated using Solvency II classification methodologies.

UKFDD's other liabilities are valued in accordance with the Group's valuation principles further detailed in D.3.

UKFDD Capital Management

	2021	2020
SCR ratio	267%	185%
SCR	4,361	5,802
Eligible own funds	11,651	10,736
Excess	7,290	4,934
MCR ratio	420%	364%
MCR	2,255	2,153
Eligible own funds	9,470	7,835
Excess	7,215	5,682
Tier 1 basic own funds	9,470	7,835
Tier 2 ancillary own funds	2,181	2,901

Appendix – UKFDD Solo information (continued)

UKFDD’s principles for capital management are in accordance with the Group’s capital management principles further detailed in section E.

The PRA has granted an approval for a method of calculation of ancillary own funds (“AOF”) to UKFDD. The method results in eligible AOFs of £2.2 million.

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

The table below provides a reconciliation of the capital reported within the financial statements to that within the Solvency II balance sheet.

	2021 £000s
UK GAAP reserves	6,511
Solvency II gross technical provisions adjustment	7,426
Of which amounts reallocated from UK GAAP balance sheet	(9)
Solvency II RI technical provisions adjustment	(4,697)
Solvency II valuation adjustment of investment in subsidiary	239
Total Solvency II basic own funds	9,470

The most material adjustment to reserves is as a result of the differences in valuation of technical provisions which has been further discussed above.

In addition, a Solvency II revaluation is shown which is further discussed in the section on valuation of investments above.

UKFDD Solvency Capital Requirement and Minimum Capital Requirement

	2021 £000s	2020 £000s
SCR	4,361	5,802
<i>Made up of</i>		
Market risk	3,111	4,276
Underwriting & reserving risk	1,205	1,505
Counterparty default risk	352	474
Operational risk	606	731
Diversification benefit	(913)	(1,184)
MCR	2,255	2,153
<i>MCR inputs</i>		
Net written premium	12,028	10,005

Appendix – UKFDD Solo information (continued)

UKFDD's SCR has reduced by £1.4 million when compared to 2020. This is mainly as a result of a reduction in market risk of £1.2 million which is driven by a reduced amount of open derivatives that relates to UKFDD's future premium hedging programme.

In terms of UKFDD's MCR, this has remained relatively stable when compared to the prior year, given that UKFDD's MCR is subject to the absolute floor as mandated by EIOPA. Net written premium has seen an increase when compared to prior year which is mainly as a result of favourable exchange rates.

Appendix – Quantitative Reporting Templates

The United Kingdom
Freight Demurrage
and Defence
Association Limited
GROUP

Solvency and Financial
Condition Report

Disclosures

20 February
2021

(Monetary amounts in GBP thousands)

General information

Participating undertaking name	The United Kingdom Freight Demurrage and Defence Association Limited
Group identification code	2138003OSX6Y4JS3YP47
Type of code of group	LEI
Country of the group supervisor	GB
Language of reporting	en
Reporting reference date	20 February 2021
Currency used for reporting	GBP
Accounting standards	Local GAAP
Method of Calculation of the group SCR	Standard formula
Method of group solvency calculation	Method 1 is used exclusively
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.05.01.02 - Premiums, claims and expenses by line of business
- S.05.02.01 - Premiums, claims and expenses by country
- S.23.01.22 - Own Funds
- S.25.01.22 - Solvency Capital Requirement - for groups on Standard Formula
- S.32.01.22 - Undertakings in the scope of the group

S.02.01.02
Balance sheet

Solvency II value	
C0010	
	0
	5,307
	0
	0
	0
	2,546
	0
	2,546
	0
	0
	653
	2,109
	0
	0
	0
	0
	20,387
	20,387
	20,387
	0
	0
	169
	72
	0
	5,335
	50
	31,321

Assets	
R0030	Intangible assets
R0040	Deferred tax assets
R0050	Pension benefit surplus
R0060	Property, plant & equipment held for own use
R0070	Investments (other than assets held for index-linked and unit-linked contracts)
R0080	<i>Property (other than for own use)</i>
R0090	<i>Holdings in related undertakings, including participations</i>
R0100	<i>Equities</i>
R0110	<i>Equities - listed</i>
R0120	<i>Equities - unlisted</i>
R0130	<i>Bonds</i>
R0140	<i>Government Bonds</i>
R0150	<i>Corporate Bonds</i>
R0160	<i>Structured notes</i>
R0170	<i>Collateralised securities</i>
R0180	<i>Collective Investments Undertakings</i>
R0190	<i>Derivatives</i>
R0200	<i>Deposits other than cash equivalents</i>
R0210	<i>Other investments</i>
R0220	Assets held for index-linked and unit-linked contracts
R0230	Loans and mortgages
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:
R0280	<i>Non-life and health similar to non-life</i>
R0290	<i>Non-life excluding health</i>
R0300	<i>Health similar to non-life</i>
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>
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
R0360	Insurance and intermediaries receivables
R0370	Reinsurance receivables
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
R0410	Cash and cash equivalents
R0420	Any other assets, not elsewhere shown
R0500	Total assets

S.02.01.02
Balance sheet

		Solvency II value
		C0010
Liabilities		
R0510	Technical provisions - non-life	20,082
R0520	<i>Technical provisions - non-life (excluding health)</i>	20,082
R0530	<i>TP calculated as a whole</i>	
R0540	<i>Best Estimate</i>	19,861
R0550	<i>Risk margin</i>	221
R0560	<i>Technical provisions - health (similar to non-life)</i>	0
R0570	<i>TP calculated as a whole</i>	
R0580	<i>Best Estimate</i>	
R0590	<i>Risk margin</i>	
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	0
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	232
R0830	Reinsurance payables	1,115
R0840	Payables (trade, not insurance)	422
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	0
R0900	Total liabilities	21,850
R1000	Excess of assets over liabilities	9,471

S.23.01.22

Own Funds

Basic own funds before deduction for participations in other financial sector

R0010	Ordinary share capital (gross of own shares)
R0020	<i>Non-available called but not paid in ordinary share capital at group level</i>
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
R0060	<i>Non-available subordinated mutual member accounts at group level</i>
R0070	Surplus funds
R0080	<i>Non-available surplus funds at group level</i>
R0090	Preference shares
R0100	<i>Non-available preference shares at group level</i>
R0110	Share premium account related to preference shares
R0120	<i>Non-available share premium account related to preference shares at group level</i>
R0130	Reconciliation reserve
R0140	Subordinated liabilities
R0150	<i>Non-available subordinated liabilities at group level</i>
R0160	An amount equal to the value of net deferred tax assets
R0170	<i>The amount equal to the value of net deferred tax assets not available at the group level</i>
R0180	Other items approved by supervisory authority as basic own funds not specified above
R0190	<i>Non available own funds related to other own funds items approved by supervisory authority</i>
R0200	Minority interests (if not reported as part of a specific own fund item)
R0210	<i>Non-available minority interests at group level</i>
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 other financial undertakings, including non-regulated undertakings carrying out financial activities
R0240	<i>whereof deducted according to art 228 of the Directive 2009/138/EC</i>
R0250	Deductions for participations where there is non-availability of information (Article 229)
R0260	Deduction for participations included by using D&A when a combination of methods is used
R0270	Total of non-available own fund items
R0280	Total deductions
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
R0380	Non available ancillary own funds at group level
R0390	Other ancillary own funds
R0400	Total ancillary own funds
Own funds of other financial sectors	
R0410	Credit Institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies
R0420	Institutions for occupational retirement provision
R0430	Non regulated entities carrying out financial activities
R0440	Total own funds of other financial sectors

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
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				
9,471	9,471			
0		0	0	0
0				0
0				0
0	0	0	0	0
0				
0				
0				
9,471	9,471	0	0	0
0				
0				
0				
0				
2,092			2,092	
0				
0				
0				
2,092			2,092	0
0				
0				
0				
0	0	0	0	0

S.23.01.22
Own Funds

Basic own funds before deduction for participations in other financial sector

Own funds when using the D&A, exclusively or in combination of method 1

R0450	Own funds aggregated when using the D&A and combination of method
R0460	Own funds aggregated when using the D&A and combination of method net of IGT
R0520	Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)
R0530	Total available own funds to meet the minimum consolidated group SCR
R0560	Total eligible own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)
R0570	Total eligible own funds to meet the minimum consolidated group SCR (group)
R0610	Minimum consolidated Group SCR
R0650	Ratio of Eligible own funds to Minimum Consolidated Group SCR
R0660	Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&A)
R0680	Group SCR
R0690	Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A

Reconciliation reserve

R0700	Excess of assets over liabilities
R0710	Own shares (held directly and indirectly)
R0720	Forseeable 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
R0750	Other non available own 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
0				
0				
11,563	9,471	0	2,092	0
9,471	9,471	0	0	
11,563	9,471	0	2,092	0
9,471	9,471	0	0	
4,510				
209.97%				
11,563	9,471	0	2,092	0
4,185				
276.30%				
C0060				
9,471				
0				
0				
9,471				
2,682				
2,682				

S.25.01.22

Solvency Capital Requirement - for groups on Standard Formula

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
R0010 Market risk	2,758		
R0020 Counterparty default risk	525		
R0030 Life underwriting risk	0		
R0040 Health underwriting risk	0		
R0050 Non-life underwriting risk	1,325		
R0060 Diversification	-1,018		
R0070 Intangible asset risk	0		
R0100 Basic Solvency Capital Requirement	3,589		
	C0100		
Calculation of Solvency Capital Requirement			
R0130 Operational risk	596		
R0140 Loss-absorbing capacity of technical provisions	0		
R0150 Loss-absorbing capacity of deferred taxes	0		
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200 Solvency Capital Requirement excluding capital add-on	4,185		
R0210 Capital add-ons already set	0		
R0220 Solvency capital requirement for undertakings under consolidated method	4,185		
Other information on SCR			
R0400 Capital requirement for duration-based equity risk sub-module	0		
R0410 Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420 Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430 Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440 Diversification effects due to RFF nSCR aggregation for article 304	0		
R0470 Minimum consolidated group solvency capital requirement	4,510		
Information on other entities			
R0500 Capital requirement for other financial sectors (Non-insurance capital requirements)	0		
R0510 <i>Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies</i>	0		
R0520 <i>Institutions for occupational retirement provisions</i>	0		
R0530 <i>Capital requirement for non-regulated entities carrying out financial activities</i>	0		
R0540 Capital requirement for non-controlled participation requirements	0		
R0550 Capital requirement for residual undertakings	0		
Overall SCR			
R0560 SCR for undertakings included via D&A	0		
R0570 Solvency capital requirement	4,185		

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

S.32.01.22

Undertakings in the scope of the group

	Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority
Row	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080
1	GB	2138003OSX6Y4JS3YP47	LEI	The United Kingdom Freight Demurrage and Defenc	Non life insurance undertaking	Mutual limited by guarantee	Mutual	PRA / FCA
2	CY	213800USL6J47FE5OC07	LEI	The United Kingdom Freight Demurrage and Defenc	Non life insurance undertaking	Private Company limited by shares	Non-mutual	Cyprus Ministry of Finance

S.32.01.22

Undertakings in the scope of the group

Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Criteria of influence					Inclusion in the scope of Group supervision		Group solvency calculation		
			% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	YES/NO		Date of decision if art. 214 is applied	
Row	C0010	C0020	C0030	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
1	GB	2138003OSX6Y4JS3YP47	LEI					Dominant		Included in the scope		Method 1: Full consolidation
2	CY	213800USL6J47FESOC07	LEI	100.00%	100.00%			Significant	100.00%	Included in the scope		Method 1: Full consolidation

The United Kingdom Freight Demurrage and Defence Association Limited

Solvency and Financial Condition Report

Disclosures

20 February

2021

(Monetary amounts in GBP thousands)

General information

Undertaking name	The United Kingdom Freight Demurrage and Defence Association Limited
Undertaking identification code	2138003OSX6Y4JS3YP47
Type of code of undertaking	LEI
Type of undertaking	Non-life undertakings
Country of authorisation	GB
Language of reporting	en
Reporting reference date	20 February 2021
Currency used for reporting	GBP
Accounting standards	Local GAAP
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.05.01.02 - Premiums, claims and expenses by line of business
- S.05.02.01 - Premiums, claims and expenses by country
- S.17.01.02 - Non-Life Technical Provisions
- 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	
	0
	6,161
	0
	3,399
	0
	0
	0
	0
	0
	0
	0
	653
	2,109
	0
	0
	0
	0
	20,387
	20,387
	20,387
	0
	0
	0
	169
	73
	0
	4,757
	29
	31,575

Assets	
R0030	Intangible assets
R0040	Deferred tax assets
R0050	Pension benefit surplus
R0060	Property, plant & equipment held for own use
R0070	Investments (other than assets held for index-linked and unit-linked contracts)
R0080	<i>Property (other than for own use)</i>
R0090	<i>Holdings in related undertakings, including participations</i>
R0100	<i>Equities</i>
R0110	<i>Equities - listed</i>
R0120	<i>Equities - unlisted</i>
R0130	<i>Bonds</i>
R0140	<i>Government Bonds</i>
R0150	<i>Corporate Bonds</i>
R0160	<i>Structured notes</i>
R0170	<i>Collateralised securities</i>
R0180	<i>Collective Investments Undertakings</i>
R0190	<i>Derivatives</i>
R0200	<i>Deposits other than cash equivalents</i>
R0210	<i>Other investments</i>
R0220	Assets held for index-linked and unit-linked contracts
R0230	Loans and mortgages
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:
R0280	<i>Non-life and health similar to non-life</i>
R0290	<i>Non-life excluding health</i>
R0300	<i>Health similar to non-life</i>
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>
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
R0360	Insurance and intermediaries receivables
R0370	Reinsurance receivables
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
R0410	Cash and cash equivalents
R0420	Any other assets, not elsewhere shown
R0500	Total assets

S.02.01.02
Balance sheet

		Solvency II value
		C0010
Liabilities		
R0510	Technical provisions - non-life	20,333
R0520	<i>Technical provisions - non-life (excluding health)</i>	20,333
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	20,200
R0550	<i>Risk margin</i>	132
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	0
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	232
R0830	Reinsurance payables	1,115
R0840	Payables (trade, not insurance)	358
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	68
R0900	Total liabilities	22,105
R1000	Excess of assets over liabilities	9,470

S.05.01.02

Premiums, claims and expenses by line of business

Non-life

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)										Total
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		
C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0200	
Premiums written										
R0110	Gross - Direct Business								19,270	19,270
R0120	Gross - Proportional reinsurance accepted									0
R0130	Gross - Non-proportional reinsurance accepted									0
R0140	Reinsurers' share								7,241	7,241
R0200	Net								12,028	12,028
Premiums earned										
R0210	Gross - Direct Business								19,270	19,270
R0220	Gross - Proportional reinsurance accepted									0
R0230	Gross - Non-proportional reinsurance accepted									0
R0240	Reinsurers' share								7,241	7,241
R0300	Net								12,028	12,028
Claims incurred										
R0310	Gross - Direct Business								7,611	7,611
R0320	Gross - Proportional reinsurance accepted									0
R0330	Gross - Non-proportional reinsurance accepted									0
R0340	Reinsurers' share								6,827	6,827
R0400	Net								784	784
Changes in other technical provisions										
R0410	Gross - Direct Business									0
R0420	Gross - Proportional reinsurance accepted									0
R0430	Gross - Non-proportional reinsurance accepted									0
R0440	Reinsurers' share									0
R0500	Net								0	0
R0550	Expenses incurred								9,546	9,546
R1200	Other expenses									1,282
R1300	Total expenses									10,828

S.17.01.02

Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance								Total Non-Life obligation	
		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
		C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0180
R0010	Technical provisions calculated as a whole								0		0
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole										0
Technical provisions calculated as a sum of BE and RM Best estimate											
Premium provisions											
R0060	Gross								-2,343		-2,343
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default								-5		-5
R0150	Net Best Estimate of Premium Provisions								-2,338		-2,338
Claims provisions											
R0160	Gross								22,543		22,543
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default								20,392		20,392
R0250	Net Best Estimate of Claims Provisions								2,151		2,151
R0260	Total best estimate - gross								20,200		20,200
R0270	Total best estimate - net								-187		-187
R0280	Risk margin								132		132
Amount of the transitional on Technical Provisions											
R0290	Technical Provisions calculated as a whole										0
R0300	Best estimate										0
R0310	Risk margin										0
R0320	Technical provisions - total								20,333		20,333
R0330	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total								20,387		20,387
R0340	Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total								-55		-55

5.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020

Accident year / underwriting year

Gross Claims Paid (non-cumulative)													
(absolute amount)													
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 & +
R0100	Prior											275	275
R0160	2012	1,770	3,837	3,391	1,559	-69	388	427	126	103	99		99
R0170	2013	1,564	2,323	1,248	954	674	363	84	-114	10			10
R0180	2014	1,939	2,804	2,101	700	220	252	99	99				99
R0190	2015	1,763	5,060	3,577	1,966	1,276	321	310					310
R0200	2016	1,883	2,672	1,356	1,347	244	150						150
R0210	2017	1,976	2,379	1,225	461	316							316
R0220	2018	1,415	2,123	1,218	984								984
R0230	2019	2,123	3,261	1,248									1,248
R0240	2020	1,447	2,946										2,946
R0250	2021	2,347											2,347
R0260												Total	8,784

Gross Undiscounted Best Estimate Claims Provisions													
(absolute amount)													
Year	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	
	Development year										Year end (discounted data)		
	0	1	2	3	4	5	6	7	8	9		10 & +	
R0100	Prior											501	
R0160	2012	0	0	0	0	0	757	861	577	351	224	224	
R0170	2013	0	0	0	0	968	632	462	214	182		182	
R0180	2014	0	0	0	1,598	883	455	386	300			301	
R0190	2015	0	0	7,148	4,358	2,879	1,803	794				796	
R0200	2016	0	5,708	2,651	1,660	1,075	458					458	
R0210	2017	11,232	5,034	2,772	1,565	990						991	
R0220	2018	10,162	6,013	3,407	1,465							1,466	
R0230	2019	10,135	5,972	3,037								3,040	
R0240	2020	9,058	5,402									5,407	
R0250	2021	9,169										9,177	
R0260												Total	22,543

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
0	0		0	
0	0		0	
0	0		0	
0		0	0	0
0	0			
0		0	0	0
0		0	0	0
9,470	9,470			
0		0	0	0
0				0
0	0	0	0	0
0				
0				
9,470	9,470	0	0	0
0				
0				
0				
0				
0				
2,181			2,181	
0				
0				
2,181			2,181	0
11,651	9,470	0	2,181	0
9,470	9,470	0	0	
11,651	9,470	0	2,181	0
9,470	9,470	0	0	
4,361				
2,255				
267.16%				
419.93%				
C0060				
9,470				
0				
0				
0				
9,470				
2,343				
2,343				

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
R0010 Market risk	3,111		
R0020 Counterparty default risk	352		
R0030 Life underwriting risk	0		
R0040 Health underwriting risk	0		
R0050 Non-life underwriting risk	1,205		
R0060 Diversification	-913		
R0070 Intangible asset risk	0		
R0100 Basic Solvency Capital Requirement	3,755		
Calculation of Solvency Capital Requirement			
R0130 Operational risk	606		
R0140 Loss-absorbing capacity of technical provisions	0		
R0150 Loss-absorbing capacity of deferred taxes	0		
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200 Solvency Capital Requirement excluding capital add-on	4,361		
R0210 Capital add-ons already set	0		
R0220 Solvency capital requirement	4,361		
Other information on SCR			
R0400 Capital requirement for duration-based equity risk sub-module	0		
R0410 Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420 Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430 Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440 Diversification effects due to RFF nSCR aggregation for article 304	0		
Approach to tax rate			
R0590 Approach based on average tax rate	0		
Calculation of loss absorbing capacity of deferred taxes			
R0640 LAC DT			
R0650 LAC DT justified by reversion of deferred tax liabilities	0		
R0660 LAC DT justified by reference to probable future taxable economic profit	0		
R0670 LAC DT justified by carry back, current year	0		
R0680 LAC DT justified by carry back, future years	0		
R0690 Maximum LAC DT	0		

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

C0109

0

LAC DT

C0130

0

0

0

0

0

0

