



Steamship  
Mutual

# Financial Condition Report 2021

Mutual Vision

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## Introduction

The purpose of the Financial Condition Report (FCR) is to provide Members, their Brokers and other interest parties with information about the capital position of the Steamship regulatory group and each entity within the group as at 20 February 2021.

The structure of the Financial Condition Report (FCR) follows the requirements of the Bermuda Monetary Authority's Insurance (Public Disclosure) Rules 2015 and those of the Solvency II regulations.

This report sets out different aspects of Steamship's business and performance, system of governance, risk profile, valuation methods used for solvency purposes and its capital management practices. Steamship's financial year runs to 20 February each year, reporting its results in US dollars.

### Definitions

**Steamship** A collective term covering Steamship Mutual Underwriting Association Limited ("SMUA"), Steamship Mutual Underwriting Association (Europe) Limited ("SMUAE"), The Steamship Mutual Underwriting Association (Bermuda) Limited ("SMUAB") and The Steamship Mutual Trust ("Trust") and its Corporate Trustee, The Steamship Mutual Underwriting Association Trustees (Bermuda) Limited ("SMUAT") subject to regulatory capital requirements, individually and collectively to the extent applicable in regulations.

**Regulators** Prudential Regulation Authority ("PRA"), Financial Conduct Authority ("FCA"), Insurance Companies Control Service ("ICCS"), Bermuda Monetary Authority ("BMA") and European Insurance & Occupational Pensions Authority ("EIOPA").

SMUA has branches regulated by the Monetary Authority of Singapore ("MAS"), the Japanese Financial Services Agency ("FSA") and Hong Kong Insurance Authority ("HKIA").

### Regulatory terminology

General Term	BMA	PRA / ICCS / EIOPA
Public disclosure document	<b>(FCR)</b> Financial Condition Report	<b>(SFCR)</b> Solvency & Financial Condition Report
Regulatory Group Level [Risk:Solvency Assessment]	<b>(GSSA)</b> Group Solvency Self-Assessment	<b>(Group ORSA)</b> Group Own Risk and Solvency Assessment
Solo entity level [Risk:Solvency Assessment]	<b>(CISSA)</b> Commercial Insurers' Solvency Self-Assessment	<b>(ORSA)</b> Own Risk and Solvency Assessment
Standard formula capital requirement	<b>(BSCR)</b> Bermuda Solvency Capital Requirement	<b>(SCR)</b> Solvency Capital Requirement
Minimum capital requirement	<b>(MMS)</b> Minimum Margin of Solvency	<b>(MCR)</b> Minimum Capital Requirement
Capital resources	Available Statutory Capital & Surplus	Own Funds

## Executive Summary

The aim of this report is to enable readers to understand the amount and type of risks taken by an insurer, as reflected in its capital requirement, and to compare this with the amount and type of capital resources which the insurer has available to protect itself against those risks.

Under Solvency II regulations Steamship is considered to be a regulatory group comprising SMUA, SMUAE, SMUAB, the Trust, and SMUAT. The supervisor for this group is the BMA and so Steamship calculates its group SCR using the BMA's standard formula.

Steamship manages its overall capital resources to maintain a financial strength rating of A (stable) from Standard & Poor's. This is a higher capital requirement than that set by regulators.

**At 20 February 2021, Steamship had a SCR of \$277.3m and total eligible capital resources of \$542.1m. The 2021 SCR ratio of 195% (2020: 219%) is evidence of the strength of Steamship's capital position, even after capital returns to Members in the last five financial years.**

The following table shows the solvency position of Steamship and each entity within this group.

\$000	Entity	Steamship	SMUAT	SMUAB	SMUAE	SMUA
<b>Capital resources</b>		<b>542,083</b>	315,095	50,825	40,781	122,102
<b>SCR</b>		<b>277,329</b>	136,647	37,397	26,877	73,051
<b>SCR Ratio</b>		<b>195%</b>	231%	136%	152%	167%

The following tables show the components of the group capital requirement and capital resources:

\$000	2021	2020
Underwriting risk	206,315	186,952
Counterparty default risk	7,558	6,199
Market risk	96,934	86,491
Operational risk	34,544	32,189
	345,351	311,831
Diversification between risk categories	(68,022)	(60,691)
<b>SCR</b>	<b>277,329</b>	251,140

Consistent with the risk appetite of the Club the majority of the capital requirement derives from underwriting risk. Market risk primarily relates to the investments held by Steamship, reflecting a strategic emphasis on capital preservation over investment return.

## Executive Summary

### Own funds

\$000

	2021	2020
Tier 1 capital - Free reserves on Solvency II basis	465,732	461,059
Tier 2 capital		
Steamship Hydra Cell	14,347	21,901
Allowance for ability to make additional calls	62,004	66,606
<b>Total eligible own funds</b>	<b>542,083</b>	<b>549,566</b>
<b>SCR Ratio</b>	<b>195%</b>	<b>219%</b>

Tier 1 capital refers to resources on the Solvency II balance sheet and is available to meet risks throughout the business.

Tier 2 capital relates to resources which are either only available to meet particular risks or are additional funds that can be raised if required. Tier 2 capital can be used to make up a maximum of 50% of the capital requirement.

Solvency II requires that free reserves in the financial statements of \$511.1m be restated on an 'economic' basis. The main adjustments required are to the provision for outstanding claims where any prudence in provisions is removed, leaving a 'best or most likely estimate' of cost. A discount is then applied to reflect the time value of money and finally a 'risk margin' is added using a standard calculation. The aim of this adjustment is to make claim provisions and therefore free reserves more comparable across insurers.

\$14.3m of Steamship Hydra cell capital is available for limited purposes and as such is designated as Tier 2 capital.

The Regulators recognise that Steamship can increase own funds (capital resources) by making additional premium calls under its Rules and in accordance with the approved formula. Capped at 50% of the SCR, these additional own funds of \$62.0m are included as Tier 2 capital.

Steamship also ensures that capital resources of individual Steamship companies are sufficient to meet the solvency requirements set by local regulators.

### The year ahead

It has been a challenging year for Steamship as the world responded to the Covid-19 pandemic. The Directors and Managers have been focused on ensuring the safety of its staff and operational continuity so that Members continue to receive the service they expect from Steamship in these unprecedented times. The financial strength and operational resilience of Steamship are there for such events, and has utilised these throughout the year, which has also been reflected in the very positive renewal.

The Managers rolled out the business continuity plan, enabling all staff to work remotely with no disruption to the services provided to Members, and maintaining regulatory compliance.

## Statement of Directors' Responsibilities

### Statement of Directors' Responsibilities

The Directors are responsible for preparing the Financial Condition Report (FCR) in accordance with the BMA's Insurance (Public Disclosure) Rules 2015, the PRA rules and Solvency II Regulations.

Each of the Directors, confirms that, to the best of their knowledge:

- (a) throughout the financial year in question, the Group and its solo insurance undertakings have complied in all material respects with the requirements of the BMA, PRA and ICCS rules and applicable Solvency II regulations; and
- (b) it is reasonable to believe that, at the date of the publication of the Financial Condition Report (FCR), the Group and its solo insurance undertakings continue so to comply, and will continue so to comply in future.

The FCR has been authorised for issue by the Directors on 27 May 2021.

By Order of the Board



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S J Martin  
Director



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D C Ragan  
Chief Risk Officer

## A. Business & Performance

### A.1 Business

Steamship is a mutual Protection and Indemnity insurer, otherwise known as a P&I Club, providing cover for its shipowner and charterer Members against third party liabilities arising from the use and operation of ships.

The Club covers a wide range of liabilities, including: loss of life and personal injury to crew, passengers and others on board; cargo loss and damage; pollution by oil and other hazardous substances; wreck removal; collision; and damage to property. The Club also provides a wide range of services to its Members (policyholders) on claims handling, legal issues and loss prevention, and plays a leading role in coordinating the response to, and management of, maritime casualties involving Members' vessels.

Steamship is one of the largest and most diverse P&I Clubs in the world, and is a member of the International Group of P&I Clubs participating in the International Group Pool.

The thirteen principal underwriting associations which comprise the International Group collectively provide liability cover for shipowners who own approximately 90% of the world's ocean-going ships.

The International Group clubs provide cost-effective insurance to shipowners through a claims-sharing 'Pool' and collective purchase of the International Group excess loss reinsurance programme. These two arrangements provide a mechanism for sharing claims in excess of \$ 10m up to, currently, approximately \$ 8.3 billion. The policy year of all P&I Clubs commences at noon Greenwich Mean Time on 20 February.

Three core agreements underpin the governance and functioning of the International Group, namely the Group Constitution, the International Group Agreement and the Pooling Agreement. More details on these agreements can be found on the International Group's website at <http://www.igpandi.org>.

Steamship's strategy is to be the best provider of the full range of marine protection and indemnity (P&I) and related insurances, on the mutual principle, delivering both first class service and security at a reasonable cost. Steamship aims to distinguish itself from its competitors by embodying the following principles:

- Supporting the principle of mutuality and its benefits for Members, within the International Group;
- Maintaining a diverse membership in terms of geographical area, trade and vessel type;
- Maintaining a prudent approach to investment policy which prioritises capital preservation in order to provide financial security and stability;
- Ensuring the highest levels of expertise and commitment on the part of the Club's staff and advisers; and
- Providing excellent service, not only in the handling of claims, but also through extensive (in-house) loss prevention initiatives.

Guided by a clearly defined risk appetite statement, risk management is key to Steamship's strategy: diversification of members and vessels to reduce concentration of risk; a prudent investment approach focused on stable, secure returns, constraining market risk; a focus on loss prevention initiatives aiming to limit losses to members and reduce claims; and an internal culture that is sensitive to the requirements of risk management.

Steamship's strategy is to carefully grow its business organically, admitting new Members with high quality operations and a willingness to pay the premium required by the risk exposure which their business brings to Steamship.

Steamship's business model is therefore to maintain a sharp focus on serving its members and to have a diversified portfolio by trade and geographical location.

The Boards have appointed Managers who are responsible for the day to day handling of underwriting, claims and the administration of the Club's business in accordance with the policies laid down by the Directors. The Managers have operations in several locations to support these activities.

## A. Business & Performance

### **Steamship Mutual Underwriting Association Limited (“SMUA”)**

SMUA was incorporated in England and Wales in October 1909. SMUA is limited by guarantee and does not have share capital as it is owned by its Members (policyholders). The Members of SMUA comprise its Directors, SMUAB, shipowners and other entities who have ships insured by SMUA.

The day to day operations of SMUA are managed by Steamship P&I Management LLP (“SPIM”). SMUA is governed by a Board comprising a non-executive Chairman, six non-executive directors and two members of SPIM. The Board mainly consists of representatives of the Members.

SMUA is regulated by the PRA and the FCA. Both the PRA and the FCA operate a risk-based approach to supervision, which places emphasis on the need for regulated firms to have in place robust risk management frameworks.

SMUA has branches in Hong Kong, Singapore and Japan which are subject to local regulation.

### **Steamship Mutual Underwriting Association (Europe) Limited (“SMUAE”)**

SMUAE was registered in Cyprus on 4 September 2019 as a Company limited by guarantee pursuant the requirements of Cyprus Companies Law, Cap. 113 and does not have share capital as it is owned by its Members (policyholders). The registered office of SMUAE is at Vashiotis Ikos Centre, 28th October Avenue, Limassol 3107, Cyprus.

SMUAE obtained an insurance licence from the ICCS on 25 October 2019 and its principal activity is the insurance and reinsurance of Protection and Indemnity risks (P&I), and of Freight, Demurrage and Defence (FD&D) risks on behalf of its Members.

The day to day operations of SMUAE are managed by SPIM. SMUAE is governed by a Board comprising a non-executive Chairman, four non-executive directors, one member of SPIM and one member of Steamship Insurance Agency (Europe) Ltd “SIAE”. The Board mainly consists of representatives of the Members.

### **The Steamship Mutual Underwriting Association (Bermuda) Limited (“SMUAB”)**

SMUAB was established by an Act of the Parliament in Bermuda on 24 June 1974 and began underwriting with effect from 20 February 1975. SMUAB is also limited by guarantee and does not have share capital as it is owned by its Members (policyholders). The members of SMUAB comprise its Directors and all members of SMUA and SMUAE.

The operations of SMUAB are managed by Steamship Mutual Management (Bermuda) Limited and therefore SMUAB does not have any employees. SMUAB is governed by a Board comprising a non-executive Chairman, 29 non-executive directors incorporating two Directors of the Manager’s London representatives. The Board mainly consists of representatives of the Members.

SMUAB ceased writing direct business from February 2015 but continues to operate as a reinsurer of SMUA and SMUAE.

SMUAB is regulated by the BMA and is classified as a ‘Class 3A insurer’ (Solvency II equivalent).

Hydra Insurance Company Ltd is a private company owned by the thirteen members of the International Group of P&I Clubs, of which SMUAB is one.

Hydra provides reinsurance to its shareholders on a Club by Club basis through segregated accounts where premiums, losses and expenses are allocated amongst the shareholder Clubs’ segregated accounts (‘cell’). The Steamship Hydra cell is consolidated into the results of SMUAB.

### **Steamship Mutual Trust (the “Trust”)**

The Trust and its Corporate Trustee, The Steamship Mutual Underwriting Association Trustees (Bermuda) Limited (“SMUAT”) were established on 11 March 1983 in Bermuda.

SMUAT is a registered insurer under Bermudian law which enables it to act as an independent insurer for the benefit of the beneficiaries set out in the Trust Deed. These are, in addition to a number of named charities, all the Members for the time being of SMUAB.

SMUAT is governed by a Board comprising a non-executive Chairman, three non-executive directors, and the Chairmen of SMUA, and SMUAB.

## A. Business & Performance

The operations of the Trust are managed by Hamilton Investment Management Limited and therefore the Trust and SMUAT do not have any employees. Through SMUAT the Trust is regulated by the BMA and is classified as a 'Class 3A insurer' (Solvency II equivalent).

Each year commencing 20 February the Trust enters into a reinsurance contract with SMUAB for the reinsurance of all risks accepted.

Following the implementation of Solvency II rules from 1 January 2016, the BMA became the supervisor of the regulatory group with SMUAT being named as the 'Designated Insurer' (and hence regulatory group lead) for Group supervision purposes.

Steamship's registered offices and principal places of business and the contact details of its external auditors and supervisory authorities are shown below:

### The Steamship Mutual Underwriting Association Trustees (Bermuda) Limited

Registered Office	Managers	External Auditors	Group Supervisory Authority
Clarendon House 2 Church Street Hamilton HM 11 Bermuda	Hamilton Investment Management Limited Washington Mall II PO Box HM 601 Hamilton HM CX Bermuda +1 441 295 4502	Deloitte LLP Hill House 1 Little New Street London EC4A 3TR +44 (0)20 7936 3000	Bermuda Monetary Authority BMA House 43 Victoria Street Hamilton Bermuda +1 441 295 5278

### The Steamship Mutual Underwriting Association (Bermuda) Limited

Registered Office	Managers	External Auditors	Supervisory Authority
Clarendon House 2 Church Street Hamilton HM 11 Bermuda	Steamship Mutual Management (Bermuda) Limited Washington Mall II PO Box HM 601 Hamilton HM CX Bermuda +1 441 295 4502	Deloitte LLP Hill House 1 Little New Street London EC4A 3TR +44 (0)20 7936 3000	Bermuda Monetary Authority BMA House 43 Victoria Street Hamilton Bermuda +1 441 295 5278

### Steamship Mutual Underwriting Association (Europe)Limited

Registered Office	Managers	External Auditors	Supervisory Authority
Vashiotis Ikos Centre 28th October Avenue 363 Limassol 3107 Cyprus	Steamship P&I Management LLP Aquatical House 39 Bell Lane London E1 7LU +44 (0)20 7247 5490  Managers' Cyprus Representative Steamship Insurance Agency (Europe) Limited Vashiotis Ikos Centre 28 <sup>th</sup> October Avenue 363 Limassol 3107 Cyprus	Deloitte Limited Spyrou Kyprianou Avenue 24 Nicosia 1075 Cyprus +357 223 60300	Insurance Companies Control Service P.O. Box 23364 Nicosia 1682 Cyprus +357 226 2990

## A. Business & Performance

### Steamship Mutual Underwriting Association Limited

Registered Office	Managers	External Auditors	Supervisory Authority
Aquatical House 39 Bell Lane London E1 7LU	Steamship P&I Management LLP Aquatical House 39 Bell Lane London E1 7LU +44 (0)20 7247 5490  Managers' London Representative Steamship Insurance Management Services Limited Aquatical House 39 Bell Lane London E1 7LU +44 (0)20 7247 5490	Deloitte LLP Hill House 1 Little New Street London EC4A 3TR +44 (0)20 7936 3000	Authorised and regulated by the Prudential Regulation Authority 20 Moorgate London EC2R 6DA +44 (0) 20 7601 4444  Regulated by the Financial Conduct Authority 12 Endeavour Square London E20 1JN +44(0)207 066 1000

Steamship writes insurance internationally. The largest markets by premium are shown in the table below.

Gross premium written by Member location	2021	2020
	\$000	\$000
United States of America	<b>104,565</b>	120,403
Switzerland	<b>25,424</b>	23,988
South Korea	<b>17,901</b>	18,195
Netherlands	<b>14,993</b>	13,713
Taiwan	<b>10,747</b>	10,903
Hong Kong	<b>10,244</b>	10,432
China	<b>9,929</b>	8,876
Brazil	<b>7,901</b>	8,538
Greece	<b>6,904</b>	7,114
France	<b>6,776</b>	13,014
Cyprus	<b>6,722</b>	5,878
Chile	<b>6,480</b>	8,144
India	<b>6,278</b>	6,768
Germany	<b>6,009</b>	6,369
Italy	<b>5,594</b>	8,191
United Kingdom	<b>5,155</b>	7,750
Other countries	<b>32,783</b>	30,449
	<b>284,405</b>	308,725

Gross premium written in the year decreased to \$284.4m from \$308.7m last year, a 7.9% decrease; the pandemic caused vessels to be laid up during the year with a knock-on effect on premium.

## A. Business & Performance

### A.2 Performance

The 2020/21 financial year combined ratio was 125.4% compared to 99.8% in the preceding year, reflecting in part very high claims within the International Group Pool. Nevertheless, the closing free reserves were similar in both years: \$515m for 2019/20 and \$511m for 2020/21.

As was the case in 2019/20, investment income in the 2020/21 financial year was once again significantly higher than projected, at \$54m (the preceding year was \$67m). Steamship's capital strength remains high, comfortably exceeding the level required to achieve the S&P AAA rating.

The objective so far as the combined ratio is concerned is to achieve underwriting balance in each financial year. The 6 year average including the 2020/21 financial year is 99.2%.



Even if balance is unlikely to be achieved every year, it remains a reasonable objective and the measure of underwriting achievement. In the last financial year, Steamship experienced the effect of the worldwide pandemic, and made appropriate provision for it. 2020/21 was extraordinary in this respect, as well as in many others, and the combined ratio outcome for that year was impacted by two factors. First, the necessity to take a conservative approach towards projected pandemic claims. Second, the claims in the IG pooling layers which were at record levels. These factors resulted in a higher combined ratio than would otherwise have been the case, and the Directors required a 5% general increase for the 2020/21 year.

In previous years, Steamship was able to distribute surplus capital to Members, reflecting its strong financial position and substantial reserves. Nevertheless, the Directors considered that a cautious approach was warranted for the 2021/22 year, in order to accommodate potential volatility. They therefore decided against making a capital distribution, and as in preceding years they will review the position again in the autumn.

The pandemic has had many consequences during the last financial year including problems such as crew change, and the de facto detention of crew members when transfer facilities to ports and elsewhere have been limited or refused. Of course, the companies most affected were passenger vessel operators, and their exposure was reduced over the latter part of the year, by their suspension of all or nearly all operations. We did not see the level of claims that might have been anticipated at the outset of the pandemic, although the virus and unusually high pool claims did adversely affect what would otherwise have been an acceptable claims year.

## A. Business & Performance

The Managers embarked upon several initiatives following the onset of the pandemic to address the concerns of seafarers serving onboard Members' vessels, especially those whose periods of service were unavoidably extended because of difficulties in making crew changes. A series of videos was produced to inform crew and raise awareness of various aspects of the pandemic. In addition, arrangements were made to support the mental wellbeing of seafarers. This facility – MHSS – Mental Health Support Solutions provides access to a helpline, and multilingual advice and guidance from qualified psychologists with experience of the maritime sector.

More information about the performance of Steamship can be found in the Management Highlights, in particular in the Chairman of the Board's Introduction on pages 3 to 4 or in the Report & Accounts of the individual entities.

Steamship's combined underwriting results as set out in the Management Highlights and Combined Financial Statements are summarised below.

<b>Underwriting results</b>	<b>2021</b>	2020
	<b>\$000</b>	\$000
Net earned premium (A)	<b>233,632</b>	260,336
Claims incurred (B)	<b>252,735</b>	219,027
Net operating expenses (C)	<b>40,307</b>	40,780
Technical account balance	<b>(59,410)</b>	529
Combined ratio (B+C)/A	<b>125.4%</b>	99.8%

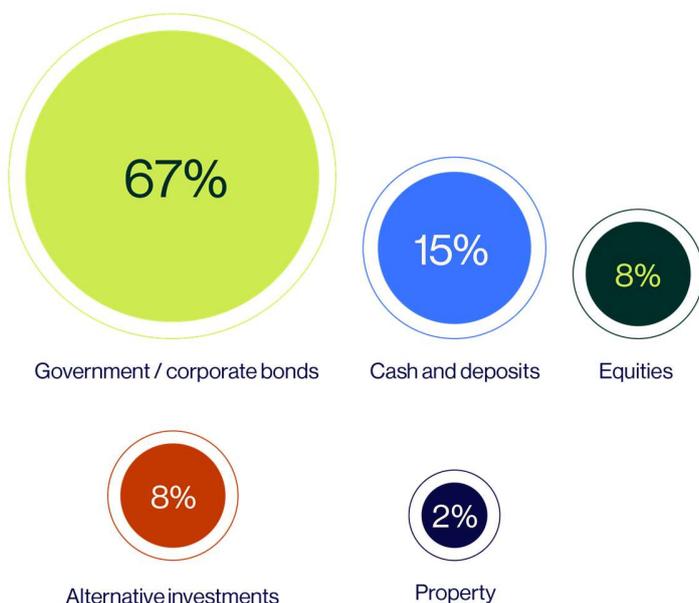
## A. Business & Performance

### A.3 Investment Performance

One of Steamship's primary objectives is to have a prudent investment policy in order to maintain financial security and stability.

Steamship splits its investments into 'core' and 'surplus' portfolios. The core portfolio is designed to match the duration and currency of best estimate claims liabilities with highly rated government and corporate bonds, managed on a buy-and-maintain basis together with operational bank accounts and overnight deposits to meet day to day liquidity requirements. This portfolio is used to provide collateral for the reinsurance obligations of SMUAT in respect of SMUAE, SMUA and SMUAB. The surplus portfolio is the set of investments in excess of those required for the 'core portfolio' and is invested to target a reasonable risk-adjusted return net of fees.

Asset allocation



The combined investment portfolio recorded an overall gain of \$54.2m, a return of 4.8%, excluding fees, land and buildings which was significantly higher than projected (the preceding year was \$67m).

The following tables show the breakdown of total cash and investments and performance.

Total cash and investments (Market value)	2021	2020
	\$000	\$000
Equities	101,436	87,174
Alternative investments	94,602	95,626
Bonds	807,270	790,222
Money market instruments	111,654	73,194
Deposits with credit institutions	28,694	26,126
Cash and cash equivalents	38,838	34,308
Derivative financial instruments	127	(669)
Property	23,262	19,829
	<b>1,205,883</b>	<b>1,125,810</b>

## A. Business & Performance

	<b>2021</b>	2020
	<b>\$000</b>	\$000
<b>Net investment return</b>		
Dividends and interest	<b>22,564</b>	26,217
<b>Realised gains/(losses)</b>		
Investments	<b>2,528</b>	(3,935)
Foreign exchange	<b>708</b>	(1,924)
Investment income	<b>25,800</b>	20,358
<b>Unrealised gains</b>		
Investments	<b>29,069</b>	44,596
Foreign exchange	<b>4,847</b>	(1,288)
Currency (gain)/losses allocated to Technical Account	<b>(5,555)</b>	3,212
Net investment return	<b>54,161</b>	66,878
Other income	<b>3,444</b>	36

All gains and losses are recognised in the combined Income and Expenditure Account.

More information about the investment performance of Steamship can be found in the Management Highlights and the Combined Financial Statements.

The information presented in section A provides a true and fair view of the business and performance of Steamship during the period.

## B. System of Governance

### B.1 General information on the system of governance

Steamship has an effective system of governance in place which provides for sound and prudent management.

Steamship entities are governed by Boards comprising a non-executive Chairman and non-executive directors representing the Members. In addition the Boards of SMUA and SMUAE have insurance professional executive directors drawn from the Managers.

The following table sets out the Board composition of each Steamship entity.

#### SMUAT Board

A L Marchisotto, Moran Holdings Inc (Chairman)	A Pohan, NY Waterway
J G Conyers	S-M Edge, Sloman Neptun, Schiffahrts, AG
S Mehta	R Thompson

#### SMUAB Board

S-M Edge, Sloman Neptun Schiffahrts AG (Chairman)	B A McAllister, McAllister Towing
C B Adams, Steamship P&I Management LLP	C K Ong, U-Ming Marine Transport Corp
R Ahqvist, Tufton Oceanic	K Park, SM Group (appointed 22 March 2021)
C J Ahrenkiel, C J Ahrenkiel Consulting Switzerland	A Pohan, NY Waterway
A Albertini, Marfin Management SAM	M Rodriguez, Royal Caribbean International (appointed 22 January 2021)
M W Bayley, Royal Caribbean International (resigned 20 October 2020)	R G Shaw, STH Commercial Management LLC
C Bouch	B K Sheth, The Great Eastern Shipping Co Ltd
D S Farkas, Norwegian Cruise Line	M Sloan, Carnival Corporation & plc
M Frith	C Sommerhage, Columbia Shipmanagement (Germany) GmbH
I Grimaldi, Grimaldi Holdings SpA	Song, Chunfeng, China Shipowners Mutual Assurance Association
D M Ho, Magsaysay Maritime Corp	A L Tung, Island Navigation Corp International Ltd
E Ide, Naviera Ultrana Ltda	E Veniamis, Golden Union Shipping Co SA
W J Kim, Polaris Shipping Co. Ltd	E Yao, Orient Overseas Container Line Ltd
C Klerides	A Zacchello, Seearland Shipping Management BV
C J Madinabeitia, Tradewind Tankers SL	R Zagari, Augustea Group
S J Martin, Steamship P&I Management LLP	S Zagury, Vale

#### SMUAE Board

C Sommerhage, Columbia Shipmanagement (Germany) GmbH (Chairman)	C Klerides
C Bouch	R Ahlqvist -Tufton Oceanic
R W Harris, Steamship P&I Management LLP	F Vrettos, Steamship Insurance Agency (Europe) Ltd (appointed 23 March 2021)
C J Madinabeitia, Tradewind Tankers SL	

## B. System of Governance

### SMUA Board

A Pohan, NY Waterway (Chairman)	I Grimaldi, Grimaldi Holdings SpA
C B Adams, Steamship P&I Management LLP	S J Martin, Steamship P&I Management LLP
C J Ahrenkiel, C J Ahrenkiel Consulting Switzerland	A L Tung, Island Navigation Corp International Ltd
C Bouch	R Zagari, Augustea Group
C J Madinabeitia, Tradewind Tankers SL	

The Boards of Directors are ultimately responsible for the operations of the relevant entities in accordance with applicable laws and regulations. The Boards determine Steamship's strategic business plan and establish directives and instructions, as well as ensuring that appropriate internal instructions for risk management and controls exist in order to operate the business within risk appetite.

The Boards continuously monitor Steamship's operations, its financial performance and stability.

The Audit and Risk Committee of the Boards is responsible for the detailed review of published financial; internal and external audit reports and oversight of regulatory relationships. The Boards' Finance and Nomination Committee is responsible for reviewing the fees paid to the Managers and Directors.

### B.2 Fit and proper requirements

Steamship is committed to ensuring that all members of its Boards, the key control function holders, and other senior individuals within Steamship, behave with integrity, honesty and skill, and this commitment is documented in the Key Person policy. Steamship has processes in place to ensure that appropriate standards of fitness and propriety are met and maintained.

Steamship's fit and proper requirements are:

- Formal qualifications, knowledge and experience within the insurance sector, other financial sectors or other relevant sectors or businesses;
- For control functions within Steamship, the required level of knowledge of accounting, actuarial, corporate management, business strategy, business models, system of governance and regulatory frameworks; and
- Honesty and financial soundness based on evidence regarding character, personal behaviour and business conduct including any criminal, financial and supervisory record.

The Managers maintain a governance map (see Appendix 1) which sets out how governance functions are fulfilled and devolved. This addresses the desire of regulators to ensure proper compliance with the requirement to devolve governance functions under Solvency II and the PRA and FCA's more detailed requirements under the Senior Managers & Certification Regime ("SM&CR").

Where a key control function is outsourced, Steamship ensures that the outsourcing firm carries out appropriate assessments of fitness and propriety for those responsible for the provision of the function and provides evidence of this.

In addition, the Boards' Finance and Nomination Committee regularly reviews the structure, size and composition of the Boards, including skills, knowledge and experience, and makes recommendations to the Boards with regard to any changes. When a new appointment is required, the Finance and Nomination Committee evaluates the balance of knowledge, skills and experience of the Board members and uses this evaluation to inform the selection of a suitable candidate.

Records are maintained, and notifications made to the regulators, as and when required.

### B.3 Risk management system (including the GSSA)

The objective of Steamship's risk management system is to ensure that the business is conducted within the overall risk appetite set by the Board. The system is characterised by a holistic, integrated and top-down enterprise risk management system, based on a shared risk culture.

## B. System of Governance

Any consideration of culture at Steamship must begin with the understanding that it is an organisation owned by its members and run for its members. This distinguishes P&I Clubs from non-mutual insurers and is a major factor in Steamship's strategic thinking and decision-making, in turn reflected in its handling of matters ranging from premium setting and return of capital to the consideration of claims outside the standard rules of cover.

The risk management system is delivered through the risk management control cycle, which involves the systematic identification, valuation, monitoring and reporting of existing and emerging risks. The Risk Management function is responsible for monitoring Steamship's risk management system reporting to the Chief Executive Officer and the Audit & Risk Committee.

Steamship uses the three lines of defence assurance model which segregates business operations from oversight and monitoring activity to improve independence and assurance over business processes.



The first line of defence is carried out by the operational functions. The second and third lines of defence are independent of the operational functions. Risk Management and Compliance, together with the Statistics (Actuarial) function jointly constitute the second line of defence.

The third line of defence is Internal Audit. This function is fully independent, outsourced and appointed by the Board.

Risk owners self-assess risk ratings and the quality of underlying controls before Risk Management undertake independent design and operational effectiveness testing.

Risk profiles are considered on an inherent (pre-controls) and residual (post-controls) basis and are documented within Steamship's risk register, with aligned controls and risk categories for capital purposes. Steamship's risk profile draws on Key Risk Indicators; risk events; recommendations from internal and external sources; emerging risks & market developments; and current controls and mitigation techniques. There is a high level of expertise and experience on the Board. In the course of Board meetings which generally take place over extended periods of three to four days three times a year, directors are able to bring their considerable industry knowledge and experience to bear on a range of both strategic and operational issues. Steamship's Managers are insurance professionals who engage on a day-to-day basis with market and regulatory developments that may affect either Steamship's insurance activity or the wider maritime community whose liability risks Steamship underwrites. Together, Directors and Managers are either members of or attendees at meetings of the Board's key decision-making bodies whose deliberations inform Steamship's current and forward-looking risk profile.

The Strategic Business Plan, Risk Management Strategy & Charter, Risk Appetite Statement and Risk Limits & Key Risk Indicators report are integral components of Steamship's Risk Management System and are reviewed at least once a year. In this way Steamship ensures that the risk management system is kept up to date.

### Group Solvency Self-Assessment ("GSSA")

Steamship monitors and manages the risks relating to its operations through its fully documented risk management programme which analyses exposures by degree and magnitude of risks. This is evidenced in the GSSA report.

The GSSA has been carried out in accordance with the GSSA-ORSA Policy. The Policy states that the GSSA is performed at least annually when the Board considers future capital requirements, capital levels and the standard increase.

The GSSA will be undertaken more frequently if specific conditions, which are set out in the Policy, are met. The Board has overall responsibility for the GSSA.

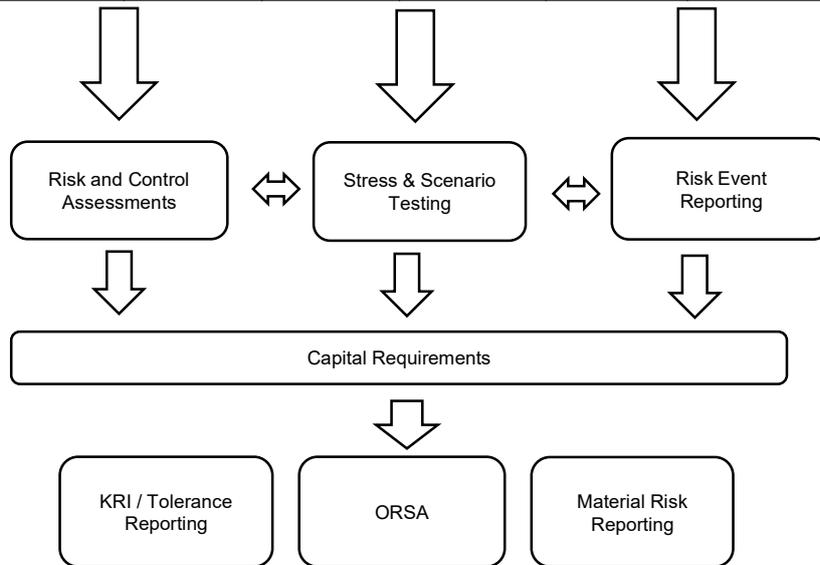
## B. System of Governance

The GSSA-ORSA policy defines the steps that make up the overall GSSA process, which are summarised in the Chart below.



Risk Types							
Underwriting Policy	Reinsurance Policy	Credit Risk Policy	Reserving and Claims Management Policy	Investment Policy	Asset Liability Management Policy	Liquidity Policy	Operational Risk policy

Other Policies							
Actuarial Policy	Data Policy	Validation Policy	Remuneration Policy (SIMSL)	Business Continuity and Disaster Recovery Policy	Internal Control Policy	Anti – Bribery Policy	Anti – Money Laundering Policy
Compliance Charter	Data Protection Policy	Stress Testing Policy	Code of Business Standards and Ethics	Outsourcing and Third Party Supplier Policy	Capital Management Policy	Anti – Fraud Policy	Whistleblowing Policy
Internal Audit Policy & Internal Audit Charter	GSSA - ORSA Policy	Expenses & Expenses Currency Hedging Policies	Conflicts of Interest Policy	Key Person Policy	Reporting and Disclosure Policy	Anti – Slavery Policy	Sanctions Policy



The Risk Management Strategy & Charter and the GSSA-ORSA Policy include a description of each process and an explanation as to how each has been completed in order to fulfil the objectives of the GSSA as a whole.

## B. System of Governance

The eighth GSSA was carried out in October 2020 and documents Steamship's risk and capital management processes employed to identify, assess, manage and report the risks it may face and to determine the capital resources required to ensure that its overall solvency needs are met at all times. The GSSA is an integral part of Steamship's business strategy, explaining how the strategy aligns to risk appetite and the current risk profile.

The GSSA includes both the economic capital position of the Group and the entity regulatory capital positions by reference to the (B)SCR and the Minimum Margin of Solvency (MMS) for the next three years.

To assist in this process Steamship has developed its own fully integrated financial capital model for the purpose of quantifying its own risks. The internal capital model uses stochastic simulations to generate financial projections which are calibrated to Steamship's own historical outcomes and relevant International Group and external data. Steamship uses an Economic Scenario Generator ("ESG") for the calculation of market risk. The ESG is a simulation model that produces arbitrage-free economic scenarios. These scenarios include a variety of key variables, such as interest rates, credit spreads, equity and property returns and, foreign exchange rates.

### B.4 Internal control system

The internal control system is designed to provide reasonable assurance regarding the proper implementation of Steamship's business strategy and the achievement of operational and financial strategic objectives through:

- monitoring and control of all risks, particularly key risks and the relevant internal controls; and
- robust, proportionate compliance.

Steamship's Internal Control Policy aims to secure the proper implementation of Steamship's business strategy and the achievement of operational, and financial strategic objectives through the monitoring and control of all risks and the related internal controls; and by means of adherence to legal, regulatory or internal provisions..

### Compliance function

The compliance function consists of a Group Head of Compliance (based in Bermuda), Risk and Compliance Director assisted by a Compliance Associate (based in London), and a local Senior Compliance Officer (SMUAE, Cyprus).. The Compliance function is responsible for providing general oversight of control effectiveness through the administration of a programme of thematic internal controls reviews, the provision of remedial advice and the monitoring of relevant legislative and regulatory changes.

### Risk Management function

The risk management function is responsible for:

- identifying, managing, monitoring and reporting on current and emerging risks;
- facilitating the calibration of the overall risk management and strategic framework; and
- monitoring and assisting in the effective operation of Steamship's risk management framework and maintaining an accurate view of Steamship's risk profile.

Steamship's Chief Risk Officer ("CRO") is the Risk & Compliance Director, currently assisted by a risk management consultant. The CRO manages day to day risk monitoring together with the Chief Finance Officer and the Director of Capital Management, all of whom report to the Board.

### B.5 Internal audit function

Steamship's Internal Audit function is outsourced to PricewaterhouseCoopers LLP. The function independently develops an internal audit plan based on its perception of risks to Steamship after consultation with Directors, Managers and the Risk Register. The scope of the plan is reviewed and approved by the Audit and Risk Committee. The segregation of Internal Audit's activities ensures independence and objectivity in the work that it undertakes.

### B.6 Actuarial function

The actuarial function consists of a team of four including the Statistics Director who fulfills the function for SMUA as Chief Actuary. The Designated Actuary for the Group, SMUAT, SMUAB and SMUAE is Marta Munoz Vilar FIA.

## B. System of Governance

The Actuarial Function resides in the Statistics Department of Steamship Insurance Management Services Limited and is responsible for: the calculation of technical provisions (for both financial reporting and solvency calculations); maintaining Steamship's Business Plan; maintaining Steamship's internal capital model and assisting with the effective running of the risk management system; production of the GSSA; and providing opinions on underwriting policy and the adequacy of reinsurance arrangements.

### B.7 Outsourcing

Steamship has an outsourcing policy in place which is approved by the Boards. The outsourcing policy ensures that outsourcing of critical or important functions or activities does not give rise to any of the following:

- an undue increase in operational risk;
- an impairment in the quality of Steamship's systems of governance;
- difficulties for supervisory authorities in monitoring compliance; and
- a deterioration in service to Members (policyholders).

Management assesses whether a function or activity is critical or important in accordance with Solvency II guidance and reports to the Board whenever outsourcing of a critical or important function or activity is considered and also when an agreement has been entered into.

Steamship has identified five functions that are deemed critical or important for Solvency II purposes. These are:

1. Management services provided by Steamship P&I Management LLP ("SPIM"), FCA FRN 597046 (SPIM is the management company of the Steamship regulatory group entities covered by this document, which are SPIM's sole clients, so that SPIM's risks and controls are largely synonymous with those of Steamship);
2. Information Technology services provided by Complete IT Ltd;
3. Software support and Cloud Outsourcing provided by Microsoft in respect of Microsoft Office 365 functionality.
4. Internal Audit services provided by PricewaterhouseCoopers LLP; and
5. Underwriting activities conducted on Steamship's behalf by Post & Co, a Rotterdam-based broker, in respect of a European Inland and Short Sea insurance Facility ("EISSF").

### B.8 Other information

There have been no material changes in the system of governance during the year, and Steamship believes it remains appropriate taking into account the nature, scale and complexity of the risks inherent in the business. In particular, the centralised approach reflects the highly integrated and inter-dependent nature of Steamship's activities.

## C. Risk Profile

Steamship monitors and manages the risks relating to its operations through its risk management programme which analyses exposures by degree and magnitude of risk. This is evidenced in the GSSA report.

The GSSA documents the risk and capital management processes employed by Steamship to identify, assess, manage and report the risks it may face and to determine the capital resources required to ensure that its overall solvency needs are met at all times. The GSSA considers the business strategy, how the strategy aligns to risk appetite and the current risk profile.

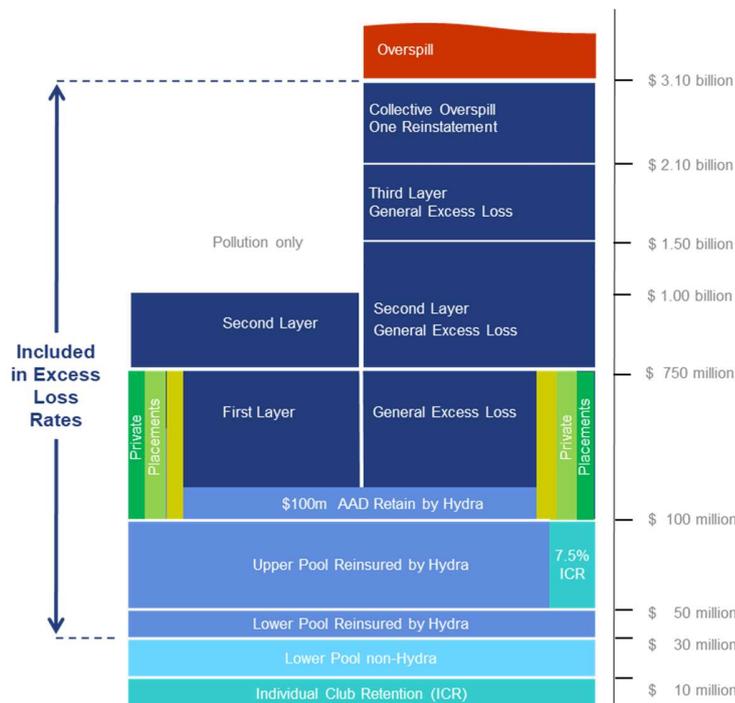
The principal risks faced by Steamship are insurance risk, market risk, credit risk, liquidity risk and operational risk.

### C.1 Insurance risk

Insurance risk is comprised of two elements; premium risk and reserving risk. Premium risk refers to the risk that insurance premium written in the current policy year is insufficient to cover claims and other costs arising in that year. It thus relates to the future, whereas reserving risk is the risk that, over the next year, existing technical provisions are insufficient to cover claims arising in previous policy years. Steamship is exposed to the uncertainty surrounding the timing, frequency and severity of claims made under its insurance contracts.

Premium is set using assumptions which have regard to trends and the past experience of a specific Member. Premium risk is mitigated by diversification across a variety of vessel types and geographical regions, and by careful selection and implementation of underwriting strategy guidelines including the screening of new Members.

Steamship transfers a substantial portion of its risk to its reinsurers through both its own arrangements and those negotiated jointly with other clubs via the International Group. The following diagram sets out the Layers of the 2021/22 Reinsurance Programme.



The key methods used to estimate claims liabilities are Bornhuetter-Ferguson for the most recent policy year reported and the Development Factor Method for all other policy years. Reserves for both reported and unreported claims are calculated using detailed statistical analysis of past experience as to frequency and average cost of claims. The Audit and Risk Committee compares the proposed claim reserves with an independent calculation performed by qualified actuaries at year end.

## C. Risk Profile

Steamship aims to reduce reserving risk by setting claims reserves at a prudent level that provides between 70% and 80% confidence that they will be sufficient to cover actual settlement costs. Actual experience will differ from the expected outcome but this prudent basis is expected to result in releases of prior year claim reserves.

### C.2 Market risk

Market risk is the risk of financial loss as a consequence of movements in the prices of equities and bonds, interest rates, currency exchange rates and other price changes. Market risk arises primarily from investment activities.

Steamship's exposure to changes in interest rates and market prices is concentrated in the investment portfolio. The risk appetite, asset allocation and tolerance ranges are set by the SMUAT Board having consulted with the Boards of SMUAB, SMUAE and SMUA. Exposures and compliance with Board policies are monitored and reported by the Managers assisted by independent investment consultants.

Steamship receives the majority of its premium income in US dollars, a significant amount in euro and small amounts in UK sterling and Canadian dollars. Claims liabilities arise in a number of currencies but predominantly in US dollars, euro, UK sterling and Brazilian reals. This exposure is mitigated by holding investments and derivatives in these currencies. To minimise currency translation costs operational bank balances in local currencies are maintained to fund expected short-term claim payments in those currencies.

### C.3 Credit risk

Credit risk is the risk that a counterparty owing money to Steamship may default causing a debt to be written off. The extensive reinsurance protection arranged by Steamship effectively transforms a proportion of insurance risk into credit risk as the exposure becomes the risk of reinsurer default. External reinsurers are generally only used if their financial strength rating is at Standard & Poor's A- or an equivalent rating from another rating agency except in the case of some Members of the International Group and participants on reinsurance contracts placed through the International Group.

The credit risk arising from the reinsurance contracts with SMUAB and SMUAT is mitigated through the operation of a collateral agreement.

Credit risk in respect of amounts due from Members is spread across diverse industries and geographical areas. Cover can be cancelled and claims set off against unpaid premium and there are other strong incentives for Members to keep their insurance cover in place. In practice therefore the prompt payment of premium means bad debt is immaterial.

Credit risk arises on operational balances and deposits held with banks. Controls include the use of a variety of banks and the limitation of individual exposures to \$15m (S&P AA rated banks, or equivalent rating from other agencies), and \$10m (S&P A rated banks, equivalent rating from other agencies). US\$5m for banks rated BBB or worse by S&P, or an equivalent rating from another agency and US\$10 m for not rated banks if the bank is a member of a Deposit Protection Fund that will guarantee protection of at least US\$10m.

### C.4 Liquidity risk

Liquidity risk is the risk that Steamship cannot meet its financial obligations as they fall due. Steamship maintains a highly liquid portfolio of cash, government and corporate bonds with a maturity equivalent to the expected settlement period of claim liabilities. Most of the remaining assets in the surplus portfolio could be converted into cash in less than one month.

### C.5 Operational risk

Operational risk includes fraud, interruptions in service due to external or internal disruption and procedural or systems errors. Steamship has identified its operational risks in a risk register and has in place appropriate controls to manage and mitigate such risks, consistent with good practice, regulatory guidance and legislation relating to human resources, financial crime, business continuity and information security. Appropriate controls are also in place to monitor the outsourcing of operations to the Managers and, through them, other service providers.

### C.6 Other material risks

Steamship's Standard Formula Appropriateness Assessment identified the fact that SMUA's legal obligation to fund the SIMSL (Managers) defined benefit pension scheme was not captured by the Standard Formula. Following an application for rule variation, on 5 January 2018 the PRA issued a written notice setting a capital add-on of \$12.693m for this obligation.

## C. Risk Profile

### Group Risk

Group risk is the risk of loss resulting from risk events arising within a related entity. Under Solvency II Steamship is considered to be a regulatory group and has to monitor the individual Steamship companies to ensure that capital resources are more than sufficient to meet the requirements set by local regulators.

### C.7 Other information - Stress and sensitivity tests

Steamship has developed a suite of stress and sensitivity tests, including reverse stress tests, which are used to measure the robustness of the capital position.

During 2020/21 the following detailed stress tests were carried out:

- Climate Change
- Pandemic
- Coincidence of worst performing years in each claim category, type of business and entity
- Reinsurance failure as a result of insolvency/winding up (Reverse Stress Test)
- 40% decline in equity prices
- 40% decline in alternative investments and real estate
- Extreme US Yield Curve Widening
- Widening of credit spreads
- Foreign currency shocks
- Inflation and Monetary Policy risk
- Single claim of \$2 billion in current policy year

The stress and sensitivity testing results show that Steamship is most vulnerable to high claims experience. However, Steamship benefits from significant reinsurance cover for incidents greater than \$10 m and is expected to continue to meet its Solvency requirements in all scenarios.

## D. Valuation for Solvency Purposes

### D.1 Assets

In accordance with the Solvency II Directive, SMUAE's assets and liabilities (other than technical provisions) are measured in accordance with principles of an arm's-length transaction between knowledgeable willing parties using market consistent valuation methods.

The following tables display the Balance Sheet as reported within the published report and accounts, the Solvency II adjustments made and the Solvency II valuation for the Group, SMUAT, SMUAB, SMUA and SMUAE.

#### Group

	2021 GAAP \$000	Adjustments	2021 Solvency II \$000
<b>Assets</b>			
Deferred acquisition costs	762	(762)	-
Investments	1,179,743		1,179,743
Reinsurers' share of technical provisions	279,826	(14,478)	265,348
Insurance & intermediaries receivables	8,933	47	8,980
Receivables (trade, not insurance)	6,897		6,897
Cash and cash equivalents	26,140		26,140
Any other assets, not elsewhere shown	4,896		4,896
<b>Total assets</b>	<b>1,507,197</b>	<b>(15,193)</b>	<b>1,492,004</b>
<b>Liabilities</b>			
Technical provisions			
Technical provisions calculated as a whole	959,148		-
Best Estimate	-	(28,125)	931,023
Risk margin	-	40,272	40,272
Sub-total	<b>959,148</b>	<b>12,147</b>	<b>971,295</b>
Insurance & intermediaries payables	18,166	3,610	21,776
Reinsurance payables	7,949		7,949
Payables (trade, not insurance)	10,758		10,758
Any other liabilities, not elsewhere shown	112	(450)	(338)
<b>Total liabilities</b>	<b>996,133</b>	<b>15,307</b>	<b>1,011,440</b>
<b>Free reserves</b>	<b>511,064</b>	<b>(30,500)</b>	<b>480,564</b>

## D. Valuation for Solvency Purposes

### SMUAT

#### Assets

Investments  
Any other assets, not elsewhere shown

#### Total assets

#### Liabilities

Technical provisions  
Technical provisions calculated as a whole  
Best Estimate  
Risk margin  
Sub-total  
Insurance & intermediaries payables  
Reinsurance payables  
Payables (trade, not insurance)

#### Total liabilities

#### Free reserves

	2021 GAAP \$000	Adjustments	2021 Solvency II S\$000
Investments	911,482		911,482
Any other assets, not elsewhere shown	4,107		4,107
<b>Total assets</b>	<b>915,589</b>	<b>-</b>	<b>915,589</b>
Technical provisions			
Technical provisions calculated as a whole	523,855		-
Best Estimate	-	(9,437)	514,418
Risk margin	-	15,590	15,590
<b>Sub-total</b>	<b>523,855</b>	<b>6,153</b>	<b>530,008</b>
Insurance & intermediaries payables	-		-
Reinsurance payables	66,788		66,788
Payables (trade, not insurance)	3,698		3,698
<b>Total liabilities</b>	<b>594,341</b>	<b>6,153</b>	<b>600,494</b>
<b>Free reserves</b>	<b>321,248</b>	<b>(6,153)</b>	<b>315,095</b>

### SMUAB

#### Assets

Investments  
Reinsurers' share of technical provisions  
Insurance & intermediaries receivables  
Receivables (trade, not insurance)  
Cash and cash equivalents  
Any other assets, not elsewhere shown

#### Total assets

#### Liabilities

Technical provisions  
Technical provisions calculated as a whole  
Best Estimate  
Risk margin  
Sub-total  
Reinsurance payables  
Payables (trade, not insurance)

#### Total liabilities

#### Free reserves

	2021 GAAP \$000	Adjustments	2021 Solvency II \$000
Investments	137,898		137,898
Reinsurers' share of technical provisions	438,540	2,588	441,128
Insurance & intermediaries receivables	12,342		12,342
Receivables (trade, not insurance)	3,122		3,122
Cash and cash equivalents	1,843		1,843
Any other assets, not elsewhere shown	398		398
<b>Total assets</b>	<b>594,143</b>	<b>2,588</b>	<b>596,731</b>
Technical provisions			
Technical provisions calculated as a whole	536,990		-
Best Estimate	-	1,512	538,502
Risk margin	-	5,829	5,829
<b>Sub-total</b>	<b>536,990</b>	<b>7,341</b>	<b>544,331</b>
Reinsurance payables	1,407		1,407
Payables (trade, not insurance)	70		70
<b>Total liabilities</b>	<b>538,467</b>	<b>7,341</b>	<b>545,808</b>
<b>Free reserves</b>	<b>55,675</b>	<b>(4,752)</b>	<b>50,923</b>

## D. Valuation for Solvency Purposes

### SMUA

#### Assets

Deferred acquisition costs
Investments
Reinsurers' share of technical provisions
Insurance & intermediaries receivables
Receivables (trade, not insurance)
Cash and cash equivalents
Any other assets, not elsewhere shown

#### Total assets

#### Liabilities

Technical provisions
Technical provisions calculated as a whole
Best Estimate
Risk margin
Sub-total
Insurance & intermediaries payables
Reinsurance payables
Payables (trade, not insurance)
Any other liabilities, not elsewhere shown

#### Total liabilities

#### Free reserves

	2021 GAAP \$000	Adjustments	2021 Solvency II \$000
	490	(490)	0
	83,924		83,924
	757,687	(23,181)	734,506
	63,458		63,458
	3,677		3,677
	15,355		15,355
	370		370
<b>Total assets</b>	<b>924,961</b>	<b>(23,671)</b>	<b>901,290</b>
	800,545		-
	-	(23,660)	776,885
	-	12,729	12,729
<b>Sub-total</b>	<b>800,545</b>	<b>(10,931)</b>	<b>789,614</b>
	12,891	2,522	15,413
	6,900		6,900
	3,675		3,675
	113		113
<b>Total liabilities</b>	<b>824,124</b>	<b>(8,409)</b>	<b>815,715</b>
<b>Free reserves</b>	<b>100,837</b>	<b>(15,262)</b>	<b>85,575</b>

### SMUAE

#### Assets

Investments
Deferred Tax Assets
Reinsurers' share of technical provisions
Receivables (trade, not insurance)
Cash and cash equivalents

#### Total assets

#### Liabilities

##### Technical provisions

Technical provisions - IFRS
Best Estimate – Regulatory basis
Risk margin
Sub-total
Insurance & intermediaries payables
Reinsurance payables
Payables (trade, not insurance)

#### Total liabilities

	2021 IFRS \$000	Adjustments	2021 Solvency II \$000
	46,467		46,467
	272	(272)	-
	144,444	(201)	144,243
	4,267		4,267
	8,831		8,831
<b>Total assets</b>	<b>204,281</b>	<b>(473)</b>	<b>203,808</b>
	158,603		-
	-	717	17,291
	-	4,768	3,335
<b>Sub-total</b>	<b>158,603</b>	<b>5,485</b>	<b>164,088</b>
	5,275		5,275
	3,653		3,653
	3,449		3,449
<b>Total liabilities</b>	<b>170,980</b>	<b>5,485</b>	<b>176,465</b>

## D. Valuation for Solvency Purposes

	2021 IFRS \$000	Adjustments	2021 Solvency II \$000
Free reserves	33,301	(5,958)	27,343

The investments are valued for Solvency II purposes on the same basis as the annual financial statements, which follow IFRS/UK GAAP.

The reinsurance recoverables have, for Solvency II purposes, been discounted using the risk-free rate term structure.

### D.2 Technical Provisions

The key change under Solvency II is the economic valuation of technical provisions, comprising:

- the best estimate of all cashflows, positive and negative, discounted to reflect the time value of money;
- provisions at market value (hence, a risk margin must be added reflecting the cost of the capital tied up in running the liabilities);
- inclusion of legally bound contracts (even if not yet incepted); and
- all future outcomes (including events not in [historical] data - or ENIDs - have to be considered).

#### Reconciliation of Technical Provisions

Below is a reconciliation of technical provisions reported in the published report and accounts and on a Solvency II basis for the Group, SMUAT, SMUAB, SMUA and SMUAE.

#### Group

	Gross \$000	Reinsurers' share \$000	Net \$000
<b>Published Technical Provisions</b>			
Unearned premium	3,610	-	3,610
Outstanding claims	995,538	279,826	675,712
<b>UK GAAP Published technical provisions (outstanding claims)</b>	<b>959,148</b>	<b>279,826</b>	<b>679,322</b>
<b>Adjustments</b>			
Remove unearned premium	(3,610)	-	(3,610)
Remove prudent margin	(71,573)	(21,204)	(50,369)
Add bound but not incepted	59,621	18,244	41,377
Add events not in data	12,000	-	12,000
Add provision for reinsurer default	-	(865)	865
Reclassification of (Re)Insurance debtors/creditors	47	-	47
Discount cash flows	(24,610)	(10,653)	(13,957)
Add risk margin	40,272	-	40,272
<b>Total adjustments</b>	<b>12,147</b>	<b>(14,478)</b>	<b>26,625</b>
<b>Regulatory technical provisions</b>	<b>971,295</b>	<b>265,348</b>	<b>705,947</b>

## D. Valuation for Solvency Purposes

### SMUAT

	<b>Gross</b> \$000
<b>Published Technical Provisions</b>	
UK GAAP Published technical provisions (outstanding claims)	<b>523,855</b>
<b>Adjustments</b>	
Remove prudent margin	(46,384)
Add bound but not incepted	37,429
Add events not in data	10,800
Discount cash flows	(11,283)
Add risk margin	15,590
<b>Total adjustments</b>	<b>6,152</b>
<b>Regulatory technical provisions</b>	<b>530,007</b>

### SMUAB

	<b>Gross</b> \$000	<b>Reinsurers' share</b> \$000	<b>Net</b> \$000
<b>Published Technical Provisions</b>			
UK GAAP Published technical provisions (outstanding claims)	<b>536,990</b>	<b>438,540</b>	<b>98,450</b>
<b>Adjustments</b>			
Remove prudent margin	(35,860)	(35,860)	-
Add bound but not incepted	37,319	37,319	-
Add events not in data	10,800	10,800	-
Add provision for reinsurer default	-	(1,298)	1,298
Discount cash flows	(10,747)	(8,373)	(2,374)
Add risk margin	5,829	-	5,829
<b>Total adjustments</b>	<b>7,341</b>	<b>2,588</b>	<b>4,753</b>
<b>Regulatory technical provisions</b>	<b>544,331</b>	<b>441,128</b>	<b>103,203</b>

## D. Valuation for Solvency Purposes

### SMUA

	Gross	Reinsurers' share	Net
	\$000	\$000	\$000
<b>Published Technical Provisions</b>			
Unearned premium	2,522	-	2,522
Outstanding claims	798,023	757,688	40,336
<b>UK GAAP Published technical provisions (outstanding claims)</b>	<b>800,545</b>	<b>757,688</b>	<b>42,858</b>
<b>Adjustments</b>			
Remove unearned premium	(2,522)	-	(2,522)
Remove prudent margin	(60,193)	(57,202)	(2,991)
Add bound but not incepted	45,831	43,246	2,585
Add events not in data	8,400	7,560	840
Add provision for reinsurer default	0	(2,376)	2,376
Discount cash flows	(15,177)	(14,409)	(768)
Add risk margin	12,729	-	12,729
<b>Total adjustments</b>	<b>(10,932)</b>	<b>(23,181)</b>	<b>12,249</b>
<b>Regulatory technical provisions</b>	<b>789,613</b>	<b>734,507</b>	<b>55,107</b>

### SMUAE

	Gross	Reinsurers' share	Net
	\$000	\$000	\$000
<b>Published Technical Provisions</b>			
<b>IFRS Published technical provisions (outstanding claims)</b>	<b>158,603</b>	<b>144,444</b>	<b>14,159</b>
<b>Adjustments</b>			
Remove unearned premium	(1,089)	-	(1,089)
Remove prudent margin	(11,380)	(10,387)	(993)
Add bound but not incepted	12,976	10,525	2,451
Add events not in data	3,600	3,240	360
Add provision for reinsurer default	-	(449)	449
Discount cash flows	(3,390)	(3,130)	(260)
Add risk margin	4,768	-	4,768
<b>Total adjustments</b>	<b>5,485</b>	<b>(201)</b>	<b>5,686</b>
<b>Regulatory technical provisions</b>	<b>164,088</b>	<b>144,243</b>	<b>19,845</b>

Steamship values technical provisions using the methodology prescribed by the Solvency II Directive. This methodology is documented in Steamship's paper *Solvency II - Basis of Preparation*.

For IFRS and UK GAAP the technical provisions are valued using undiscounted values.

For Solvency II purposes the technical provisions are the sum of the best estimate and the risk margin. The technical provisions are calculated separately for the premium provision and for the claims provision, both using a best estimate basis.

## D. Valuation for Solvency Purposes

The best estimate is the probability weighted average of future cashflows discounted with the risk-free term structure for US dollars provided by EIOPA. The probability-weighted average future cashflows are calculated according to actuarial best practice, using several methods and techniques such as the Development Factor Method (DFM) and the Bornhuetter-Ferguson technique for immature policy years.

As a monoline Protection & Indemnity insurer, Steamship currently uses one homogeneous risk group for the calculation of technical provisions.

The risk margin is the cost of holding the SCR to run off, determined by multiplying each year's projected SCR by the current prescribed cost of capital of 6% per annum.

The key source of uncertainty in the technical provisions is the randomness of claims both in terms of size and timing, and the impact on the ultimate cost of the unpaid claims.

### D.3 Other information

There are no other differences between the valuation bases, methods and main assumptions used for the purposes of solvency or financial statement calculations.

No other material information is applicable.

## E. Capital Management

Steamship is committed to maintaining a strong capital position in order to be a robust insurer for its Members (policyholders). The objective is to maintain a solvency level in line with the risk appetite statement. Sensitivity tests for the principal risks are performed periodically and annual stress tests are performed to test Steamship's capacity to withstand moderate to severe scenarios. A key objective is to maintain a capital position and a risk profile that supports a Standard & Poor's 'A' (Stable) rating.

Steamship's risk appetite statement requires that each regulated entity should hold Own Funds equivalent to at least 120% of (B)SCR.

Steamship undertakes a GSSA annually as well as when the risk profile or business model materially changes. The GSSA incorporates the business planning process which is typically considered over a three-year time horizon. Solvency ratios are regularly monitored by the Audit and Risk Committee and Boards

### E.1 Own funds

The tables below detail the capital position of the individual entities and the regulatory group as at 20 February 2021. With respect to the capital position, the BMA rules and Solvency II regulations require insurers to categorise own funds into the following two tiers with differing qualifications as eligible available regulatory capital:

- Tier 1 capital consists of Free Reserves of the entities on a Solvency II economic basis (Basic Own funds 'Unrestricted'); and
- Tier 2 capital consists of ancillary own funds ("AOF").

Ancillary own funds consist of items other than basic own funds which can be used to absorb losses. AOF items require the prior approval of the supervisory authority. Steamship has approved AOF items.

The rules impose limits on the amount of each tier that can be held to cover capital requirements with the aim of ensuring that the items will be available if needed to absorb any losses that might arise.

The following tables show the breakdown of eligible Own Funds to meet the SCR.

#### As at 20 February 2021

Own Funds by Tiers \$000	Entity Regulator	Group BMA	SMUAT BMA	SMUAB BMA	SMUAE ICCS	SMUA PRA
Tier 1 Basic Own funds (Unrestricted)		465,732	315,095	37,715	27,343	85,576
Tier 2 Ancillary own funds		60,004	-	-	13,438	36,526
Tier 2 Encumbered assets (Hydra Restricted)		14,347	-	13,110		-
<b>Total Eligible own funds to meet the SCR</b>		<b>542,083</b>	315,095	50,825	40,781	122,102

#### As at 20 February 2020

Own Funds by Tiers \$000	Entity Regulator	Group BMA	SMUAT BMA	SMUAB BMA	SMUAE ICCS	SMUA PRA
Tier 1 Basic Own funds (Unrestricted)		461,059	300,489	41,542	24,519	93,320
Tier 2 Ancillary own funds		66,606	-	-	8,358	40,964
Tier 2 Encumbered assets (Hydra Restricted)		21,901	-	20,165		-
<b>Total Eligible own funds to meet the SCR</b>		<b>549,565</b>	300,489	61,707	32,877	134,284

Steamship's Tier 1 Own Funds are made up 100% of free reserves which have arisen from past underwriting and investment surpluses. As such all capital is Tier 1 and there are no restrictions on the availability of Steamship's Tier 1 own funds to support the MMS/MCR or SCR.

Steamship has also been granted Tier 2 ancillary own funds (AOF) of \$60.0m which reflect its ability to make additional premium calls on Mutual Members.

## E. Capital Management

SMUAE has been granted Tier 2 AOF of \$14.8m which reflects its ability to make additional premium calls on Mutual Members.

SMUA has been granted Tier 2 AOF of \$47.0m which reflects its ability to make additional premium calls on Mutual Members.

The BMA recognises that Steamship can increase own funds by making additional premium calls under its rules in extreme circumstances. The BMA has granted approval for a method of calculation of ancillary own funds (AOF) and, subject to an annual confirmation by Steamship that key factors remain valid, the method is approved until 20 February 2022.

The PRA and ICCS recognise that SMUA and SMUAE can increase own funds by making additional premium calls under its Rules in extreme circumstances. The PRA and ICCS have granted approvals for a method of calculation of AOF and, subject to annual confirmations by SMUA and SMUAE that the key factors remain valid, this method is approved until 20 April 2023.

Under the BMA Rules and Solvency II regulations, up to 50% of the SCR may be supported by approved AOF.

The future risk profile of Steamship is anticipated to remain relatively stable.

The following tables show the breakdown of eligible Own Funds to meet the Minimum Margin of Solvency (MMS) / Minimum Capital Requirement ("MCR").

### As at 20 February 2021

Own Funds by Tiers \$000	Entity Regulator	Group	SMUAT	SMUAB	SMUAE	SMUA
		BMA	BMA	BMA	ICCS	PRA
Tier 1 Basic Own funds (Unrestricted)		465,732	315,095	37,715	27,343	85,576
Tier 2 Ancillary own funds		-	-	-	-	-
Tier 2 Encumbered assets (Hydra Restricted)		14,347	-	9,429	-	-
<b>Total Eligible own funds to meet the MMS</b>		<b>480,079</b>	315,095	47,144	27,343	85,576

### As at 20 February 2020

Own Funds by Tiers \$000	Entity Regulator	Group	SMUAT	SMUAB	SMUAE	SMUA
		BMA	BMA	BMA	ICCS	PRA
Tier 1 Basic Own funds (Unrestricted)		461,059	300,489	41,542	24,519	93,320
Tier 2 Ancillary own funds		-	-	-	-	-
Tier 2 Encumbered assets (Hydra Restricted)		21,901	-	20,165	-	-
<b>Total Eligible own funds to meet the MMS</b>		<b>482,960</b>	300,489	61,707	24,519	93,320

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

The SCR and MMC/MCR for the regulatory group and the individual entities have been determined using the 'Standard Formula' approach as set out in the BMA's Rules and those of the Solvency II regulations.

No material simplified methods or undertaking-specific parameters have been used in this assessment.

The Group and SMUAB assessments have been prepared using the Accounting Consolidation based method.

## E. Capital Management

The following table show the breakdown of the SCR and MMS.

### As at 20 February 2021

Risk Category \$000	Entity Regulator	Group BMA	SMUAT BMA	SMUAB BMA	SMUAE ICCS	SMUA PRA
Non-life underwriting risks		206,315	89,092	26,566	15,143	31,243
Counterparty default risks		7,558	244	14,393	9,971	20,862
Market risks		96,934	91,129	4,198	572	3,191
Operational risks		34,544	1,353	370	4,803	26,614
Total before diversification between risks		345,351	181,818	45,527	30,489	81,910
Diversification between risk categories		(68,022)	(45,171)	(8,130)	(3,612)	(8,859)
<b>Solvency Capital Requirement (SCR)</b>		<b>277,329</b>	136,647	37,397	26,877	73,051
Minimum Margin of Solvency (MMS)		112,407	78,578	8,877	6,719	18,263

### As at 20 February 2020

Risk Category \$000	Entity Regulator	Group BMA	SMUAT BMA	SMUAB BMA	SMUAE ICCS	SMUA PRA
Non-life underwriting risks		186,952	80,788	22,088	11,189	36,416
Counterparty default risks		6,199	113	12,663	7,276	22,367
Market risks		86,491	82,750	3,682	294	6,005
Operational risks		32,189	1,227	314	519	28,508
Total before diversification between risks		311,831	164,877	38,747	19,278	93,296
Diversification between risk categories		(60,691)	(40,934)	(7,046)	(2,562)	(11,369)
<b>Solvency Capital Requirement (SCR)</b>		<b>251,140</b>	123,943	31,701	16,716	81,927
Minimum Margin of Solvency (MMS)		101,912	70,340	7,925	4,179	20,482

### Solvency ratio

Ratio of eligible own funds to Solvency Capital Requirement:

	Entity Regulator	Group BMA	SMUAT BMA	SMUAB BMA	SMUAE ICCS	SMUA PRA
<b>20 February 2021</b>		<b>195%</b>	231%	136%	152%	167%
<b>20 February 2020</b>		<b>219%</b>	242%	195%	197%	164%

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

The duration-based equity risk sub-module has not been used in the calculation of the SCR.

### E.4 Difference between Standard Formula and any Internal Model used

No internal or partial internal model has been used in the calculation of the SCR. However, Steamship's Standard Formula Appropriateness Assessment identified that the obligation to fund a defined benefit pension scheme operated by the Managers' service company (SIMSL) was not captured by Standard Formula calculations. This resulted in a voluntary capital add-on of \$12.693m for this operational risk.

## E. Capital Management

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

Steamship has set out to be fully compliant with the Standard Formula calculation of MCR and SCR and is not aware of any non-compliance.

The Group and the individual entities have maintained Own Funds (Free Reserves) in excess of the MCR and SCR throughout the period.

### **E.6 Other information**

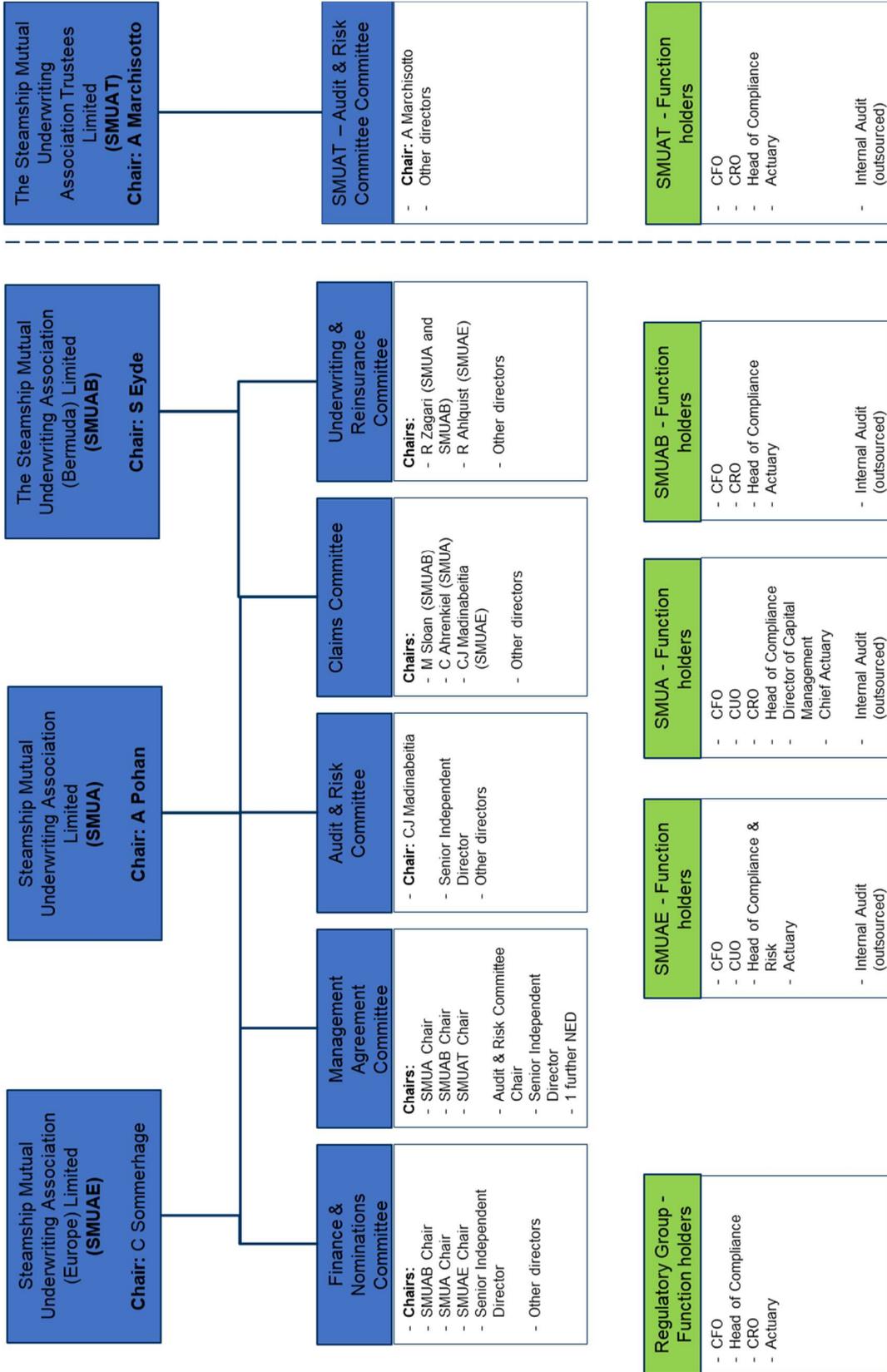
Steamship has an interactive Standard & Poor's rating of 'A' with a stable outlook.

#### **Subsequent events**

There were no material subsequent events.

The financial statements were approved and authorised for issue by the Board on 7 June 2021

## Appendix 1 – Steamship Regulatory Group Governance Map



## Appendix 2 – SMUA – Quantitative Reporting Templates

### List of reported templates

S.02.01.01 – Balance Sheet

S.05.01.02 – Premium, claims and expenses by line of business

S.05.02.01 – Premium, claims and expenses by country

S.17.01.01 – Non-Life Technical Provisions

S.19.01.21 – Non-Life insurance claims

S.23.01.01 – Own Funds

S.25.01.01 – 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

Balance sheet

Ring Fenced Fund or remaining part   
Fund number

	Solvency II value	Statutory accounts value	Reclassification adjustments
	C0010	C0020	EC0021
<b>Assets</b>			
Goodwill			
Deferred acquisition costs			
Intangible assets			
Deferred tax assets			
Pension benefit surplus			
Property, plant & equipment held for own use			
Investments (other than assets held for index-linked and unit-linked contracts)	45,121,574	45,121,574	0.00
<i>Property (other than for own use)</i>			
<i>Holdings in related undertakings, including participations</i>	29,070	29,070	
<i>Equities</i>	-	-	0.00
<i>Equities - listed</i>			
<i>Equities - unlisted</i>			
<i>Bonds</i>	16,399,002	16,399,002	0.00
<i>Government Bonds</i>	16,399,002	16,399,002	
<i>Corporate Bonds</i>			
<i>Structured notes</i>			
<i>Collateralised securities</i>			
<i>Collective Investments Undertakings</i>			
<i>Derivatives</i>	-	-	
<i>Deposits other than cash equivalents</i>	28,693,502	28,693,502	
<i>Other investments</i>			
Assets held for index-linked and unit-linked contracts			
Loans and mortgages	-	-	0.00
<i>Loans on policies</i>			
<i>Loans and mortgages to individuals</i>			
<i>Other loans and mortgages</i>			
Reinsurance recoverables from:	734,506,643	757,687,511	
<i>Non-life and health similar to non-life</i>	734,506,643	757,687,511	
<i>Non-life excluding health</i>	734,506,643	757,687,511	
<i>Health similar to non-life</i>			
<i>Life and health similar to life, excluding index-linked and unit-linked</i>	-	-	
<i>Health similar to life</i>			
<i>Life excluding health and index-linked and unit-linked</i>			
<i>Life index-linked and unit-linked</i>			
Deposits to cedants			
Insurance and intermediaries receivables	5,033,262	5,033,262	
Reinsurance receivables	58,424,389	58,424,389	
Receivables (trade, not insurance)	3,676,845	3,676,845	
Own shares (held directly)			
Amounts due in respect of own fund items or initial fund called up but not yet paid in			
Cash and cash equivalents	54,157,443	54,157,443	
Any other assets, not elsewhere shown	369,422	859,703	
<b>Total assets</b>	<b>901,289,578</b>	<b>924,960,727</b>	<b>0.00</b>

	Solvency II value	Statutory accounts value	Reclassification adjustments
	C0010	C0020	EC0021
<b>Liabilities</b>			
Technical provisions - non-life	789,613,659	800,545,405	
<i>Technical provisions - non-life (excluding health)</i>	789,613,659	800,545,405	
<i>TP calculated as a whole</i>			
<i>Best Estimate</i>	776,884,581		
<i>Risk margin</i>	12,729,078		
<i>Technical provisions - health (similar to non-life)</i>	-		
<i>TP calculated as a whole</i>			
<i>Best Estimate</i>			
<i>Risk margin</i>			
Technical provisions - life (excluding index-linked and unit-linked)	-	-	
<i>Technical provisions - health (similar to life)</i>	-		
<i>TP calculated as a whole</i>			
<i>Best Estimate</i>			
<i>Risk margin</i>			
<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	-		
<i>TP calculated as a whole</i>			
<i>Best Estimate</i>			
<i>Risk margin</i>			
Technical provisions - index-linked and unit-linked	-		
<i>TP calculated as a whole</i>			
<i>Best Estimate</i>			
<i>Risk margin</i>			
Other technical provisions			
Contingent liabilities			
Provisions other than technical provisions			
Pension benefit obligations	-	-	
Deposits from reinsurers			
Deferred tax liabilities			
Derivatives			
Debts owed to credit institutions			
<i>Debts owed to credit institutions resident domestically</i>			
<i>Debts owed to credit institutions resident in the euro area other than domestic</i>			
<i>Debts owed to credit institutions resident in rest of the world</i>			
Financial liabilities other than debts owed to credit institutions			
<i>Debts owed to non-credit institutions</i>	-	-	0.00
<i>Debts owed to non-credit institutions resident domestically</i>			
<i>Debts owed to non-credit institutions resident in the euro area other than domestic</i>			
<i>Debts owed to non-credit institutions resident in rest of the world</i>			
<i>Other financial liabilities (debt securities issued)</i>			
Insurance & intermediaries payables	15,412,628	12,890,686	
Reinsurance payables	6,900,317	6,900,317	
Payables (trade, not insurance)	3,674,856	3,674,856	
Subordinated liabilities	-	-	0.00
<i>Subordinated liabilities not in BOF</i>			
<i>Subordinated liabilities in BOF</i>			
Any other liabilities, not elsewhere shown	112,607	112,607	
<b>Total liabilities</b>	<b>815,714,067</b>	<b>824,123,871</b>	<b>0.00</b>
<b>Excess of assets over liabilities</b>	<b>85,575,511</b>	<b>100,836,856</b>	







S.19.01.01  
Non-Life Insurance Claims Information

Line of business	Marine, aviation and transport insurance
Accident year / underwriting year	Underwriting year
Currency	USD
Currency conversion	Original currency

Gross Claims Paid (non-cumulative) (absolute amount)																			
Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080		C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
	0	1	2	3	4	5	6	Development year		8	9	10	11	12	13	14	15 & +	In Current year	Sum of years (cumulative)
Prior																		0.00	0.00
N-14																		0.00	0.00
N-13	6,244,638	19,702,704	13,551,663	12,191,780	9,550,260	7,292,513	1,736,828	554,215	-	37,517,271	1,486,423	987,408	927,111	548,371	1,666,680		1,666,680	38,923,323	
N-12	4,926,413	9,481,738	6,873,713	5,771,055	5,468,530	3,474,036	4,039,632	3,878,827	961,641	1,219,566	570,947	459,050	199,242				199,242	47,324,390	
N-11	9,675,470	8,356,166	7,734,666	7,602,291	3,904,465	2,605,773	34,238,866	8,838,226	12,292,995	3,106,086	811,145	-	155,279				155,279	99,010,870	
N-10	11,569,540	30,467,996	12,645,943	11,592,249	7,446,667	7,484,429	6,945,751	2,355,782	2,296,150	2,410,387	744,466						744,466	95,959,360	
N-9	17,348,064	196,272,845	291,645,903	202,957,642	65,354,177	34,161,886	32,575,867	23,224,091	3,909,719	2,103,949							2,103,949	869,554,143	
N-8	16,479,103	62,909,419	34,599,024	25,517,852	26,163,192	9,772,256	4,590,144	5,830,120	1,857,375								1,857,375	187,718,485	
N-7	10,960,454	22,195,600	39,030,618	18,535,323	11,158,611	10,016,066	10,236,112	2,974,176									2,974,176	125,106,960	
N-6	13,090,042	58,873,708	48,845,482	15,076,929	7,705,123	6,658,272	1,523,060										1,523,060	151,772,616	
N-5	41,729,634	110,476,043	83,225,229	29,497,180	30,226,063	12,096,107											12,096,107	307,250,256	
N-4	25,748,748	54,787,688	46,538,323	26,807,034	9,019,165												9,019,165	162,900,958	
N-3	41,306,859	117,293,543	34,767,778	14,543,482													14,543,482	207,911,662	
N-2	26,215,441	58,885,030	33,237,354														33,237,354	118,337,825	
N-1	45,005,660	57,203,904															57,203,904	102,209,564	
N	17,869,395																17,869,395	17,869,395	
<b>Total</b>																	<b>154,883,076</b>	<b>2,531,849,807</b>	

Reinsurance Recoveries received (non-cumulative) (absolute amount)																			
Year	C0600	C0610	C0620	C0630	C0640	C0650	C0660	C0670		C0680	C0690	C0700	C0710	C0720	C0730	C0740	C0750	C0760	C0770
	0	1	2	3	4	5	6	Development year		8	9	10	11	12	13	14	15 & +	In Current year	Sum of years (cumulative)
Prior																		0.00	0.00
N-14																		0.00	0.00
N-13	5,620,000	17,730,000	12,197,000	11,087,346	9,328,899	6,832,544	1,581,546	521,751	-	37,517,271	1,486,423	987,408	927,111	548,371	1,666,680		1,666,680	32,997,808	
N-12	4,511,000	8,534,000	6,187,000	5,188,859	5,181,913	3,474,036	4,039,632	3,878,827	961,641	1,219,566	570,947	459,050	199,242				199,242	44,405,713	
N-11	8,714,000	7,520,000	6,963,000	6,840,987	3,514,018	2,345,196	34,238,866	8,838,226	12,292,995	3,106,086	811,145	-	155,279				155,279	95,028,240	
N-10	10,387,000	27,423,000	11,847,000	11,592,298	7,446,667	7,484,429	6,945,751	2,355,782	2,296,150	2,410,387	744,466						744,466	90,932,930	
N-9	15,714,000	193,019,000	291,646,000	202,959,401	65,354,177	34,161,886	32,575,867	23,224,091	3,909,719	2,103,949							2,103,949	864,668,090	
N-8	14,839,000	59,559,000	34,599,000	25,517,852	26,163,192	9,772,256	4,590,144	5,830,120	1,857,375								1,857,375	182,727,939	
N-7	9,766,000	19,985,000	36,320,395	18,535,323	11,158,611	10,016,066	10,236,112	2,974,176									2,974,176	118,991,683	
N-6	11,809,000	54,588,677	48,845,482	15,076,929	7,705,123	6,658,272	1,523,060										1,523,060	146,206,543	
N-5	37,890,667	106,254,454	78,952,223	27,178,074	28,020,938	11,407,509											11,407,509	289,703,865	
N-4	23,173,873	49,422,075	42,026,312	24,417,650	7,170,769												7,170,769	146,210,679	
N-3	37,176,173	110,766,980	31,693,037	11,643,952													11,643,952	191,280,142	
N-2	23,593,897	53,429,079	28,321,709														28,321,709	105,344,685	
N-1	40,731,519	51,092,375															51,092,375	91,823,894	
N	16,036,662																16,036,662	16,036,662	
<b>Total</b>																	<b>136,586,645</b>	<b>2,416,358,873</b>	

Net Claims Paid (non-cumulative) (absolute amount)																			
Year	C1200	C1210	C1220	C1230	C1240	C1250	C1260	C1270		C1280	C1290	C1300	C1310	C1320	C1330	C1340	C1350	C1360	C1370
	0	1	2	3	4	5	6	Development year		8	9	10	11	12	13	14	15 & +	In Current year	Sum of years (cumulative)
Prior																		0.00	0.00
N-14																		0.00	0.00
N-13	624,638	1,972,704	1,354,663	1,104,434	221,361	459,969	155,282	32,464	-	-	-	-	-	-	-	-	-	0.00	592,515.00
N-12	415,413	947,738	686,713	582,196	286,617	-	-	-	-	-	-	-	-	-	-	-	-	0.00	2,918,677
N-11	961,470	836,166	772,666	761,304	390,447	260,577	-	-	-	-	-	-	-	-	-	-	-	-	3,982,630
N-10	1,182,540	3,044,996	798,943	49	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,026,430
N-9	1,634,064	3,253,845	97	1,759	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,886,053
N-8	1,640,103	3,350,419	24	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,990,546
N-7	1,194,454	2,210,600	2,710,223	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6,115,277
N-6	1,281,042	4,285,031	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,566,073
N-5	3,838,967	4,221,589	4,273,006	2,319,106	2,205,125	688,598	-	-	-	-	-	-	-	-	-	-	-	688,598	17,546,391
N-4	2,574,875	5,365,613	4,512,011	2,389,384	1,848,396	-	-	-	-	-	-	-	-	-	-	-	-	1,848,396	16,690,279
N-3	4,130,686	6,526,563	3,074,741	2,899,530	-	-	-	-	-	-	-	-	-	-	-	-	-	2,899,530	16,631,520
N-2	2,621,544	5,455,951	4,915,645	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,915,645	12,993,140
N-1	4,274,141	6,111,529	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6,111,529	10,385,670
N	1,832,733	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,832,733	1,832,733
<b>Total</b>																		<b>18,296,431</b>	<b>115,490,934</b>

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

Year	C0200	C0210	C0220	C0230	C0240	C0250	C0260	Development year		C0280	C0290	C0300	C0310	C0320	C0330	C0340	C0350	C0360
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +	Year end (discounted data)	
Prior																		
N-14																		
N-13																		26,241,802
N-12										7,598,523	6,835,914	18,206,489	16,635,752	13,002,251	26,896,303			12,647,187
N-11										20,665,680	8,624,097	3,784,955	1,232,070	8,825,787				8,561,937
N-10									17,146,443	15,233,811	12,980,093	9,609,492	5,135,029					4,960,926
N-9						97,141,035	60,524,210	40,787,577	25,679,604	21,463,447								20,666,090
N-8					38,149,316	24,493,340	14,553,309	3,219,871	544,885									544,812
N-7				57,646,885	41,794,026	29,337,038	17,717,706	12,218,494										11,725,249
N-6			60,497,535	36,972,161	24,852,626	13,548,172	18,318,492											17,894,588
N-5		166,546,383	92,791,456	67,856,965	41,234,226	27,084,202												26,600,950
N-4	175,157,423	112,740,635	79,089,301	46,595,287	30,504,552													30,034,870
N-3	320,113,626	178,331,581	109,512,548	86,963,838														85,811,397
N-2	267,662,349	173,252,227	108,061,276															106,678,165
N-1	234,132,992	189,584,693																187,196,155
N	190,316,990																	187,803,256
<b>Total</b>																		<b>726,277,760</b>

**Undiscounted Best Estimate Claims Provisions - Reinsurance recoverable**  
(absolute amount)

Year	C0800	C0810	C0820	C0830	C0840	C0850	C0860	Development year		C0880	C0890	C0900	C0910	C0920	C0930	C0940	C0950	C0960
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +	Year end (discounted data)	
Prior																		
N-14																		
N-13																		
N-12										7,562,632	11,689,353	53,739,305	51,527,052	40,577,686	26,793,210			26,152,972
N-11										20,568,070	6,960,213	3,794,241	1,228,929	8,791,959				12,597,350
N-10									17,065,455	8,780,911	13,011,937	9,584,989	5,115,346					8,528,108
N-9						96,682,206	15,510,811	40,887,641	25,614,125	21,381,178								4,941,244
N-8					37,969,124	61,624,736	14,589,012	3,211,661	542,796									20,583,822
N-7				57,374,600	24,938,708	29,409,011	17,672,528	12,171,661										542,723
N-6			60,211,785	42,553,977	24,913,597	13,513,626	18,248,278											11,678,416
N-5		155,453,617	37,644,434	63,408,692	39,123,545	25,440,444												27,208,417
N-4	160,898,165	87,400,262	72,799,818	42,293,262	27,635,563													24,984,775
N-3	104,743,953	169,327,779	104,539,502	84,009,198														82,891,628
N-2	251,045,515	161,871,022	102,021,353															100,710,524
N-1	219,459,314	178,709,048																176,448,867
N	175,382,655																	173,057,263
<b>Total</b>																		<b>687,065,037</b>

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

Year	C1400	C1410	C1420	C1430	C1440	C1450	C1460	Development year		C1480	C1490	C1500	C1510	C1520	C1530	C1540	C1550	C1560
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +	Year end (discounted data)	
Prior																	0.00	0.00
N-14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-12	-	-	-	-	-	-	-	-	-	55,474	9,747,406	1,753,250	103,732	103,093				88,830
N-11	-	-	-	-	-	-	-	-	35,891	5,464,979	44,666	42,419	49,837					49,837
N-10	-	-	-	-	-	-	-	97,610	1,663,884	9,286	3,141	33,828						33,829
N-9	-	-	-	-	-	80,988	6,452,900	31,844	24,503	19,683								19,682
N-8	-	-	-	-	458,829	45,013,399	100,064	65,479	82,269									82,268
N-7	-	-	-	-	180,192	37,131,396	35,703	8,210	2,089									2,089
N-6	-	-	-	272,285	16,855,318	71,973	46,833											46,833
N-5	-	-	285,750	5,581,816	60,971	34,546	70,214											70,214
N-4	-	11,092,766	55,147,022	4,448,273	2,110,681	1,643,758												1,616,175
N-3	14,259,258	25,340,373	6,289,483	4,302,025	2,868,989													2,826,453
N-2	215,369,673	9,003,802	4,973,046	2,954,640														2,919,769
N-1	16,616,834	11,381,205	6,039,923															5,967,641
N	14,673,678	10,875,645																10,747,288
<b>Total</b>	<b>14,934,335</b>																	<b>39,212,723</b>

**Gross Reported but not Settled Claims (RBNS)**  
(absolute amount)

Year	C0400	C0410	C0420	C0430	C0440	C0450	C0460	Development year								C0560	
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +	Year end
Prior																	0.00
N-14																	0.00
N-13	31,103,801	28,608,836	23,627,542	18,071,134	9,897,770	4,731,652	2,781,862	20,040,483	13,211,393	11,514,569	12,616,560	8,082,760	8,356,283	17,089,683			17,089,683
N-12	18,554,912	18,929,750	16,115,404	15,117,180	9,610,646	5,549,160	12,459,736	7,311,787	5,631,029	6,270,939	17,193,464	16,116,577	12,728,900				12,728,900
N-11	25,962,606	23,736,426	19,190,956	17,162,241	15,301,235	69,639,298	26,263,165	15,225,187	6,545,124	2,709,858	909,646	8,517,921					8,517,921
N-10	34,832,772	24,930,114	24,328,281	18,500,384	29,164,540	20,313,598	11,499,261	13,042,520	11,813,282	9,131,514	4,807,833						4,807,833
N-9	222,662,256	262,297,272	187,981,717	169,068,012	114,883,444	80,783,777	51,285,360	25,344,189	21,145,852	18,172,047							18,172,047
N-8	75,436,633	59,470,097	77,613,212	52,195,869	19,375,550	14,983,857	7,502,360	928,128	2,529,374								2,529,374
N-7	44,600,771	88,552,833	53,107,342	39,844,923	32,882,363	24,380,523	14,145,440	7,917,943									7,917,943
N-6	101,629,222	67,750,402	33,502,230	26,452,222	19,739,443	10,627,557	16,112,572										16,112,572
N-5	151,871,721	78,912,853	58,031,137	43,177,963	25,346,623	12,697,857											12,697,857
N-4	63,080,836	71,411,052	58,324,230	33,316,429	24,522,032												24,522,032
N-3	184,251,891	119,258,631	79,841,181	73,843,629													73,843,629
N-2	134,040,277	120,094,899	86,165,884														86,165,884
N-1	109,362,202	137,314,331															137,314,331
N	78,944,580																78,944,580
<b>Total</b>																	<b>496,305,838</b>

**Reinsurance RBNS Claims**  
(absolute amount)

Year	C1000	C1010	C1020	C1030	C1040	C1050	C1060	Development year								C1160	
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +	Year end
Prior																	0.00
N-14																	0.00
N-13	25,716,801	25,223,836	21,553,542	17,108,563	9,156,558	4,448,266	2,650,076	20,040,483	13,211,393	11,514,569	12,616,560	8,082,760	8,356,283	17,089,683			17,089,683
N-12	16,032,912	17,349,750	15,223,404	14,801,244	9,610,646	5,549,160	12,459,736	7,311,787	5,631,029	6,270,939	17,193,464	16,116,577	12,728,900				12,728,900
N-11	21,916,606	20,525,426	16,754,956	15,485,072	14,014,512	69,639,298	26,263,165	15,225,187	6,545,124	2,709,858	909,646	8,517,921					8,517,921
N-10	30,875,772	24,120,114	24,328,281	18,500,384	29,164,540	20,313,598	11,499,261	13,042,520	11,813,282	9,131,514	4,807,833						4,807,833
N-9	219,385,256	262,297,272	187,981,717	169,068,012	114,883,444	80,783,777	51,285,360	25,344,189	21,145,852	18,172,047							18,172,047
N-8	72,065,633	59,470,097	77,613,212	52,195,869	19,375,550	14,983,857	7,502,360	928,128	2,529,374								2,529,374
N-7	35,815,771	81,848,412	49,113,352	39,844,923	32,882,363	24,380,523	14,145,440	7,917,943									7,917,943
N-6	89,441,165	60,225,042	33,502,230	26,452,222	19,739,443	10,627,557	16,112,572										16,112,572
N-5	144,010,092	72,206,027	53,235,012	39,846,228	23,798,090	11,723,077											11,723,077
N-4	56,281,601	64,616,681	53,108,353	30,107,048	22,144,901												22,144,901
N-3	175,620,549	113,460,815	77,026,894	71,956,142													71,956,142
N-2	124,913,394	113,051,842	81,909,928														81,909,928
N-1	103,054,191	130,027,140															130,027,140
N	71,862,579																71,862,579
<b>Total</b>																	<b>472,441,292</b>

**Net RBNS Claims**  
(absolute amount)

Year	C1600	C1610	C1620	C1630	C1640	C1650	C1660	Development year								C1760	
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +	Year end
Prior																	0.00
N-14																	0.00
N-13	5,387,000	3,385,000	2,074,000	962,571	741,212	283,386	131,786										0.00
N-12	2,522,000	1,580,000	892,000	315,936													0.00
N-11	4,046,000	3,211,000	2,436,000	1,677,169	1,286,723												
N-10	3,857,000	810,000															
N-9	3,277,000																
N-8	3,371,000		1,683														
N-7	8,785,000	6,704,421	3,993,990														
N-6	12,188,057	7,525,360															
N-5	7,861,629	6,706,826	4,796,125	3,331,735	1,548,533	974,780											974,780
N-4	6,799,235	6,794,371	5,215,877	3,209,381	2,377,131												2,377,131
N-3	8,631,342	5,797,816	2,814,287	1,887,487													1,887,487
N-2	9,126,883	7,043,057	4,255,956														4,255,956
N-1	6,308,011	7,287,191															7,287,191
N	7,082,001																7,082,001
<b>Total</b>																	<b>23,864,546</b>

**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**

Ordinary share capital (gross of own shares)  
 Share premium account related to ordinary share capital  
 Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings  
 Subordinated mutual member accounts  
 Surplus funds  
 Preference shares  
 Share premium account related to preference shares  
 Reconciliation reserve  
 Subordinated liabilities  
 An amount equal to the value of net deferred tax assets  
 Other own fund items approved by the supervisory authority as basic own funds not specified above

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
-				
-				
-				
-				
-				
-				
85,575,511	85,575,511			
-				
-				
-				

**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**

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

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**Deductions**

Deductions for participations in financial and credit institutions

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**Total basic own funds after deductions**

85,575,511	85,575,511	-	-	-
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**Ancillary own funds**

Unpaid and uncalled ordinary share capital callable on demand  
 Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand  
 Unpaid and uncalled preference shares callable on demand  
 A legally binding commitment to subscribe and pay for subordinated liabilities on demand  
 Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC  
 Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC  
 Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC  
 Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC

-				
-				
-				
-				
-				
47,023,744			47,023,744	
-				
-				
47,023,744			47,023,744	-

**Available and eligible own funds**

Total available own funds to meet the SCR  
 Total available own funds to meet the MCR  
 Total eligible own funds to meet the SCR  
 Total eligible own funds to meet the MCR

132,599,255	85,575,511	-	47,023,744	-
85,575,511	85,575,511	-	-	-
122,101,197.95	85,575,511	-	36,525,686.95	-
85,575,511	85,575,511	-	-	-

**SCR**

**MCR**

**Ratio of Eligible own funds to SCR**

**Ratio of Eligible own funds to MCR**

73,051,373.90
18,262,843.48
167.14%
468.58%

**Reconciliation reserve**

Excess of assets over liabilities  
 Own shares (held directly and indirectly)  
 Foreseeable dividends, distributions and charges  
 Other basic own fund items  
 Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds

C0060
85,575,511
-
85,575,511

**Expected profits**

Expected profits included in future premiums (EPIFP) - Life business  
 Expected profits included in future premiums (EPIFP) - Non- life business  
 Total Expected profits included in future premiums (EPIFP)

-

S.25.01.01

Solvency Capital Requirement - for undertakings on Standard Formula

Article 112

	C0030	C0040	C0050
	Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustment portfolios
Market risk	3,190,561	3,190,561	0.00
Counterparty default risk	20,861,775	20,861,775	0.00
Life underwriting risk			0.00
Health underwriting risk			0.00
Non-life underwriting risk	31,243,409	31,243,409	0.00
Diversification	- 8,858,052	- 8,858,052	
Intangible asset risk		-	
<b>Basic Solvency Capital Requirement</b>	<b>46,437,693</b>	<b>46,437,693</b>	
<b>Calculation of Solvency Capital Requirement</b>	<b>C0100</b>		
Adjustment due to RFF/MAP nSCR aggregation			
Operational risk	13,931,307.90		
Loss-absorbing capacity of technical provisions	-		
Loss-absorbing capacity of deferred taxes			
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC			
<b>Solvency Capital Requirement excluding capital add-on</b>	<b>60,369,000.90</b>		
Capital add-ons already set	12,682,373		
<b>Solvency capital requirement</b>	<b>73,051,373.90</b>		
<b>Other information on SCR</b>			
Capital requirement for duration-based equity risk sub-module			
Total amount of Notional Solvency Capital Requirements for remaining part			
Total amount of Notional Solvency Capital Requirements for ring fenced funds			
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios			
Diversification effects due to RFF nSCR aggregation for article 304			
Method used to calculate the adjustment due to RFF/MAP nSCR aggregation			
Net future discretionary benefits			



## Appendix 3 – SMUAE – Quantitative Reporting Templates

### List of reported templates

S.02.01.02 – Balance Sheet

S.05.01.02 – Premium, claims and expenses by line of business

S.05.02.01 – Premium, 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	Statutory accounts value	Reclassification adjustments
		C0010	C0020	EC0021
<b>Assets</b>				
R0010	Goodwill		-	
R0020	Deferred acquisition costs		271,544	
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)	46,467,648	46,467,648	-
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>	46,467,648	46,467,648	-
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:	144,243,234	144,443,560	-
R0280	<i>Non-life and health similar to non-life</i>	144,243,234	144,443,560	-
R0290	<i>Non-life excluding health</i>	144,243,234	144,443,560	-
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	3,856,111	3,856,111	-
R0370	Reinsurance receivables	78,196	78,196	-
R0380	Receivables (trade, not insurance)	333,186	333,186	-
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	8,831,172	8,831,172	0
R0420	Any other assets, not elsewhere shown	-	-	-
R0500	<b>Total assets</b>	<b>203,809,547</b>	<b>204,281,416</b>	<b>0</b>

	Solvency II value	Statutory accounts value	Reclassification adjustments
	C0010	C0020	EC0021
<b>Liabilities</b>			
R0510 Technical provisions - non-life	164,088,496	158,602,887	-
R0520 <i>Technical provisions - non-life (excluding health)</i>	164,088,496	158,602,887	
R0530 <i>TP calculated as a whole</i>	-		
R0540 <i>Best Estimate</i>	159,320,607		
R0550 <i>Risk margin</i>	4,767,890		
R0560 <i>Technical provisions - health (similar to non-life)</i>	-	-	
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)	-	-	-
R0610 <i>Technical provisions - health (similar to life)</i>	-	-	
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>	-	-	
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	-	-	-
R0700 <i>TP calculated as a whole</i>	-		
R0710 <i>Best Estimate</i>	-		
R0720 <i>Risk margin</i>	-		
R0730 Other technical provisions	-	-	-
R0740 Contingent liabilities	-	-	-
R0750 Provisions other than technical provisions	-	-	-
R0760 Pension benefit obligations	-	-	-
R0770 Deposits from reinsurers	-	-	-
R0780 Deferred tax liabilities	-	-	-
R0790 Derivatives	-	-	-
R0800 Debts owed to credit institutions	-	-	-
R0810 Financial liabilities other than debts owed to credit institutions	-	-	-
R0820 Insurance & intermediaries payables	8,723,723	8,723,723	-
R0830 Reinsurance payables	3,653,339	3,653,339	-
R0840 Payables (trade, not insurance)	-	-	-
R0850 Subordinated liabilities	-	-	-
R0860 <i>Subordinated liabilities not in BOF</i>	-	-	-
R0870 <i>Subordinated liabilities in BOF</i>	-	-	-
R0880 Any other liabilities, not elsewhere shown	-	-	-
R0900 <b>Total liabilities</b>	<b>176,465,558</b>	<b>170,979,949</b>	<b>-</b>
R1000 <b>Excess of assets over liabilities</b>	<b>27,343,989</b>	<b>33,301,467</b>	









S.19.01.21 – Non-Life insurance claims

Line of business	Marine, aviation and transport insurance
Accident year / underwriting year	Underwriting year
Currency	USD
Currency conversion	Reporting currency

Gross Claims Paid (non-cumulative)																		
(absolute amount)																		
Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
	0	1	2	3	4	5	6	Development year	8	9	10	11	12	13	14	15 & +	In Current year	Sum of years (cumulative)
Prior																	-	-
N-14																	-	-
N-13																	19,345	19,345
N-12																	30,201	30,201
N-11																	19,856	19,856
N-10																	-	-
N-9																	1,405	1,405
N-8																	5,417	5,417
N-7																	36,394	36,394
N-6																	20,557	20,557
N-5																	61,299	61,299
N-4																	286,700	286,700
N-3																	361,585	361,585
N-2																	963,949	963,949
N-1																	3,407,588	3,407,588
N																	15,613,667	15,613,667
<b>Total</b>																	<b>20,747,137</b>	<b>20,747,137</b>

Gross Undiscounted Best Estimate Claims Provision																		
(absolute amount)																		
Year	C0600	C0610	C0620	C0630	C0640	C0650	C0660	C0670	C0680	C0690	C0700	C0710	C0720	C0730	C0740	C0750	C0760	C0770
	0	1	2	3	4	5	6	Development year	8	9	10	11	12	13	14	15 & +	In Current year	Sum of years (cumulative)
Prior																	-	-
N-14																	-	-
N-13																	19,345	19,345
N-12																	30,201	30,201
N-11																	19,856	19,856
N-10																	-	-
N-9																	1,405	1,405
N-8																	5,417	5,417
N-7																	36,394	36,394
N-6																	20,557	20,557
N-5																	55,169	55,169
N-4																	258,030	258,030
N-3																	325,426	325,426
N-2																	867,554	867,554
N-1																	3,066,829	3,066,829
N																	14,065,376	14,065,376
<b>Total</b>																	<b>18,690,733</b>	<b>18,690,733</b>

Net Claims Paid (non-cumulative)																		
(absolute amount)																		
Year	C1200	C1210	C1220	C1230	C1240	C1250	C1260	C1270	C1280	C1290	C1300	C1310	C1320	C1330	C1340	C1350	C1360	C1370
	0	1	2	3	4	5	6	Development year	8	9	10	11	12	13	14	15 & +	In Current year	Sum of years (cumulative)
Prior																	0.00	0.00
N-14																	0.00	0.00
N-13																	0.00	0.00
N-12																	0.00	0.00
N-11																	0.00	-
N-10																	-	-
N-9																	-	-
N-8																	-	-
N-7																	-	-
N-6																	-	-
N-5																	6,130	6,130
N-4																	28,670	28,670
N-3																	36,159	36,159
N-2																	96,395	96,395
N-1																	340,759	340,759
N																	1,548,291	1,548,291
<b>Total</b>																	<b>2,056,404</b>	<b>2,056,404</b>

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

Year	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270		C0280	C0290	C0300	C0310	C0320	C0330	C0340	C0350	C0360
	0	1	2	3	4	5	6	Development year		8	9	10	11	12	13	14	15 & +	Year end (discounted data)
Prior																	0.00	0.00
N-14																		5,394,117
N-13																		3,667,798
N-12														3,766,673		5,437,234		1,322,736
N-11													1,322,906					2,645,978
N-10												2,735,119						1,691,838
N-9											1,754,491							497,156
N-8										516,677								714,834
N-7									743,693									1,023,405
N-6										1,046,688								2,334,829
N-5											2,375,574							8,063,732
N-4																		13,672,851
N-3																		19,680,588
N-2																		25,093,198
N-1																		60,936,592
N	61,720,222	25,400,820	19,925,744	13,849,271	8,184,874	2,375,574	1,046,688	743,693	516,677	1,754,491	2,735,119	1,322,906	3,766,673	5,437,234			<b>Total</b> 144,094,180	

**Undiscounted Best Estimate Claims Provisions - Reinsurance recoverable**  
(absolute amount)

Year	C0800	C0810	C0820	C0830	C0840	C0850	C0860	C0870		C0880	C0890	C0900	C0910	C0920	C0930	C0940	C0950	C0960
	0	1	2	3	4	5	6	Development year		8	9	10	11	12	13	14	15 & +	Year end (discounted data)
Prior																	0.00	0.00
N-14																		5372032.00
N-13																		3,652,498
N-12																		1,317,363
N-11																		2,634,868
N-10																		1,684,711
N-9																		495,058
N-8																		711,813
N-7																		1,019,153
N-6																		2,134,247
N-5																		7,260,659
N-4																		12,300,607
N-3																		17,671,334
N-2																		22,999,529
N-1																		55,100,982
N	55,812,494	23,282,649	17,892,371	12,459,977	7,370,188	2,171,645	1,042,436	740,672	514,578	1,747,365	2,724,010	1,317,532	3,751,374	5,415,149.64			<b>Total</b> 131,720,128	

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

Year	C1400	C1410	C1420	C1430	C1440	C1450	C1460	C1470		C1480	C1490	C1500	C1510	C1520	C1530	C1540	C1550	C1560
	0	1	2	3	4	5	6	Development year		8	9	10	11	12	13	14	15 & +	Year end (discounted data)
Prior																	0.00	0.00
N-14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	22085.00	
N-13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15300.00	
N-12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,373	
N-11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	11,110	
N-10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7,127	
N-9	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,098	
N-8	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,021	
N-7	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,252	
N-6	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	200,582	
N-5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	803,073	
N-4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,372,244	
N-3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,009,254	
N-2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,093,669	
N-1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,835,610	
N	5,907,728	2,118,171	2,033,373	1,389,294	814,686	203,929	4,252	3,021	2,099	7,126	11,109	5,374	15,299.00	22,084.84			<b>Total</b> 12,374,052	

Gross Reported but not Settled Claims (RBNS)																	
(absolute amount)																	
Year	C0400	C0410	C0420	C0430	C0440	C0450	C0460	C0470	C0480	C0490	C0500	C0510	C0520	C0530	C0540	C0550	C0560
	Development year															Year end	
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +	
Prior																0.00	-
N-14																	-
N-13																	-
N-12																	4,688,970
N-11																	3,496,450
N-10																	4,688,970
N-9																	3,496,450
N-8																	1,256,407
N-7																	1,256,407
N-6																	2,597,596
N-5																	2,597,596
N-4																	1,605,859
N-3																	1,605,859
N-2																	485,912
N-1																	485,912
N	33,463,196	18,830,670	17,421,222	7,162,203	6,324,674	2,017,854	882,217	501,177									501,177
<b>Total</b>																	<b>98,221,593</b>

Reinsurance RBNS Claims																	
(absolute amount)																	
Year	C1000	C1010	C1020	C1030	C1040	C1050	C1060	C1070	C1080	C1090	C1100	C1110	C1120	C1130	C1140	C1150	C1160
	Development year															Year end	
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +	
Prior																0.00	-
N-14																	-
N-13																	-
N-12																	4,688,970
N-11																	3,496,450
N-10																	4,688,970
N-9																	3,496,450
N-8																	1,256,407
N-7																	1,256,407
N-6																	2,597,596
N-5																	2,597,596
N-4																	1,605,859
N-3																	1,605,859
N-2																	485,912
N-1																	485,912
N	30,329,199	17,254,024	15,679,100	6,475,440	5,709,741	1,845,142	882,217	501,177									501,177
<b>Total</b>																	<b>90,294,420</b>

Net RBNS Claims																	
(absolute amount)																	
Year	C1600	C1610	C1620	C1630	C1640	C1650	C1660	C1670	C1680	C1690	C1700	C1710	C1720	C1730	C1740	C1750	C1760
	Development year															Year end	
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15 & +	
Prior																0.00	-
N-14																	-
N-13																	-
N-12																	-
N-11																	-
N-10																	-
N-9																	-
N-8																	-
N-7																	-
N-6																	-
N-5																	-
N-4																	172,712
N-3																	614,933
N-2																	686,763
N-1																	1,742,122
N	3,133,997	1,576,646	1,742,122	686,763	614,933	172,712											1,576,646
<b>Total</b>																	<b>7,927,173</b>

S.23.01.01 – Own Funds

**Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35**

	Total C0010	Tier 1 unrestricted C0020	Tier 1 restricted C0030	Tier 2 C0040	Tier 3 C0050
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	35,000,000	35,000,000			
R0050 Subordinated mutual member accounts					
R0070 Surplus funds					
R0090 Preference shares					
R0110 Share premium account related to preference shares					
R0130 Reconciliation reserve	- 7,656,011	- 7,656,011			
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					

**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**

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

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**Deductions**

R0230 Deductions for participations in financial and credit institutions

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R0290 **Total basic own funds after deductions**

27,343,989	27,343,989	-	-	-
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**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**

-				
-				
-				
-				
-				
14,777,618			14,777,618	
-				
-				
14,777,618			14,777,618	-

**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

42,121,607	27,343,989	-	14,777,618	-
27,343,989	27,343,989	-	-	-
40,782,242	27,343,989	-	13,438,253	-
27,343,989	27,343,989	-	-	-

R0580 **SCR**  
R0600 **MCR**  
R0620 **Ratio of Eligible own funds to SCR**  
R0640 **Ratio of Eligible own funds to MCR**

26,876,506
6,719,127
152%
407%

**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**

C0060
27,343,989
35,000,000
- 7,656,011

**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)**

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S.25.01.21 – Solvency Capital Requirement – for undertakings on standard formula

Z0010

	C0030	C0040	C0050
	Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
R0010 Market risk	572,370	572,370	-
R0020 Counterparty default risk	9,971,461	9,971,461	-
R0030 Life underwriting risk			-
R0040 Health underwriting risk			-
R0050 Non-life underwriting risk	15,142,680	15,142,680	-
R0060 Diversification	- 3,612,990	- 3,612,990	
R0070 Intangible asset risk		-	
<b>R0100 Basic Solvency Capital Requirement</b>	<b>22,073,521</b>	<b>22,073,521</b>	
<b>Calculation of Solvency Capital Requirement</b>			
	C0100		
R0120 Adjustment due to RFF/MAP nSCR aggregation			
R0130 Operational risk	4,802,985		
R0140 Loss-absorbing capacity of technical provisions	-		
R0150 Loss-absorbing capacity of deferred taxes			
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC			
<b>R0200 Solvency Capital Requirement excluding capital add-on</b>	<b>26,876,506</b>		
R0210 Capital add-ons already set			
<b>R0220 Solvency capital requirement</b>	<b>26,876,506</b>		
<b>Other information on SCR</b>			
R0400 Capital requirement for duration-based equity risk sub-module			
R0410 Total amount of Notional Solvency Capital Requirements for remaining part			
R0420 Total amount of Notional Solvency Capital Requirements for ring fenced funds			
R0430 Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios			
R0440 Diversification effects due to RFF nSCR aggregation for article 304			
R0450 Method used to calculate the adjustment due to RFF/MAP nSCR aggregation			
R0460 Net future discretionary benefits			

