

Solvency and Financial Condition Report

TT Club Mutual Insurance Limited

Year ended 31 December 2019

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Summary

This document forms the Solvency and Financial Condition Report (“SFCR”) for the year ended 31 December 2019 that is required to be published by TT Club Mutual Insurance Limited (“TTI”).

The SFCR and attached appendices have been prepared on a solo basis for TTI but given the group supervision provisions under Solvency II and as TTI and its parent company, Through Transport Mutual Insurance Association Limited (“TTB”), are managed as a single business the report also includes relevant information for the Group as a whole.

This report covers the Business and Performance of the Company, its System of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management. During the year there have been no material changes in this regard.

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

TTI’s business is the provision of liability and asset insurances and related risk management services to the international transport and logistics industry. TTI is a mutual company, limited by guarantee. It is a subsidiary of Through Transport Mutual Insurance Association Limited (“TT Bermuda”), a mutual insurance company based in Bermuda. The two companies have separate corporate governance arrangements but operate as a single business.

TTI’s business strategy is to provide superior insurance products and claims handling to its policyholder Members at a competitive price, whilst maintaining excellent financial security over the long term. Insurance is very much a cyclical business, with premium rates fluctuating in accordance with the supply of capital in the market and with the investment returns available to the owners of that capital. TTI maintains a conservative investment strategy.

During the year under review, TTI made a surplus for the year of US\$4.045m as reported in its annual financial statements prepared under UK GAAP. This comprised a surplus of US\$2.6m on the technical account and a surplus of US\$1.4m on the non-technical account.

Under Solvency II, TTI’s eligible own funds amounted to US\$75.480 million compared with its Solvency Capital Requirement (“SCR”) of US\$41,066 million resulting in a solvency ratio of 184% (2018: 171%).

TTB made a consolidated surplus for the year of US\$16.021 million and as at 31 December 2019 had surplus and reserves of US\$225.541 million.

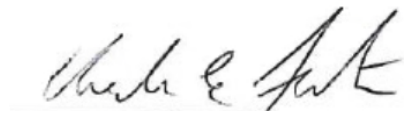
On a Solvency II basis, TTB’s eligible own funds amounted to US\$249.3 million (unaudited) compared with a SCR of US\$109.9 million (unaudited) resulting in a solvency ratio of 227% (unaudited) (2018: 234% (unaudited))

Directors' Statement

We acknowledge our responsibility for preparing the SFCR in all material respects in accordance with the PRA Rules and the Solvency II Regulations.

We are satisfied that:

- a. throughout the financial year in question, TT Club Mutual Insurance Limited has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable to the insurer; and
- b. it is reasonable to believe that the TT Club Mutual Insurance Limited has continued so to comply subsequently and will continue so to comply in future.



Signed on behalf of TT Club Mutual Insurance Limited

Date: 2 June 2020

Report of the external independent auditors to the Directors of TT Club Mutual Insurance Limited ('the Company') pursuant to Rule 4.1 (2) of the External Audit Part of the PRA Rulebook applicable to Solvency II firms

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

Opinion

We have audited the following documents prepared by the Company as at 31 December 2019:

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Solvency and Financial Condition Report of the Company as at 31 December 2019, (**the Narrative Disclosures subject to audit**); and
- Company templates S.02.01.02, S.17.01.02, S.23.01.01, S.25.01.21 and S.28.01.01 (**the Templates subject to audit**).

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

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

- The 'Summary', 'Business and performance', 'System of governance' and 'Risk profile' elements of the Solvency and Financial Condition Report;
- Company templates S.05.01.02, S.05.02.01 and S.19.01.21;
- The written acknowledgement by management of their responsibilities, including for the preparation of the Solvency and Financial Condition Report (**the Responsibility Statement**).

In our opinion, the information subject to audit in the relevant elements of the Solvency and Financial Condition Report of the Company as at 31 December 2019 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

Basis for opinion

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

Conclusions relating to going concern

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

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

However, because not all future events or conditions can be predicted, this statement is not a guarantee as to the Company's ability to continue as a going concern.

Emphasis of Matter - Basis of Accounting

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

Other Information

The Directors are responsible for the Other Information.

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

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

Responsibilities of Directors for the Solvency and Financial Condition Report

The Directors are responsible for the preparation of the Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations.

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

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

It is our responsibility to form an independent opinion as to whether the information subject to audit in the relevant elements of the Solvency and Financial Condition Report is prepared, in

all material respects, in accordance with financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

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

A further description of our responsibilities for the audit is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditors' report.

This report, including the opinion, has been prepared for the Board of Directors of the Company in accordance with External Audit rule 2.1 of the Solvency II firms Sector of the PRA Rulebook and for no other purpose. We do not, in providing this report, accept or assume responsibility for any other purpose or to any other party save where expressly agreed by our prior consent in writing.

Report on Other Legal and Regulatory Requirements

In accordance with Rule 4.1 (3) of the External Audit Part of the PRA Rulebook for Solvency II firms we are also required to consider whether the Other Information is materially inconsistent with our knowledge obtained in the audit of the Company's statutory financial statements. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.



PricewaterhouseCoopers LLP

Chartered Accountants

London

2 June 2020

A. Business & Performance

A.1 Business

A.1.1 Corporate information

TTI is incorporated in England and Wales as a company limited by guarantee without share capital. TTI's parent undertaking is Through Transport Mutual Insurance Association Limited ("TTB").

TTB is registered in Bermuda as a company limited by guarantee without share capital. TTB is incorporated in Bermuda under the Through Transport Mutual Insurance Association Limited Consolidation and Amendment Act 1993 as an exempted company.

Collectively TTB and TTI form "TT Club" and in this document are also referred to as "the Club" or "the Group".

TTI is regulated by the Prudential Regulation Authority ("PRA") and the Financial Conduct Authority ("FCA"). The PRA is located at the 20 Moorgate, London, EC2R 6DA, United Kingdom and the FCA at 12 Endeavour Square, London E20 1JN, United Kingdom. TTB is regulated by the Bermuda Monetary Authority ("BMA"). The BMA is located at BMA House, 43 Victoria Street, Hamilton, P.O. Box 2447. Hamilton HMJX, Bermuda.

The external auditor of both TTI and TTB is PricewaterhouseCoopers LLP, Chartered Accountants, 7 More London Riverside, London SE1 2RT.

A.1.2 Group structure

TTB controls 75% of the voting rights of TTI with TTI's policyholders controlling the remaining 25%.

The Group operates as a single business. 95% of policies of insurance issued by the Group are written by TTI and all mutual policyholders of TTI are Members of TTB. The policyholders therefore hold all voting rights of TTB and the Group.

The Articles of Association of TTI and the Bye-Laws of TTB are very similar and the terms and conditions of insurance policies issued by the two entities are identical. The group structure is as follows:



Organisation Structure



A.1.3 Business Mission and Strategy

TT Club is a mutual insurer and is the leading provider of insurance and related risk management services to the international transport and logistics industry.

It is recognised that a significant element of the value the Club provides to its Members is derived from the depth of expertise within its organisation. The Club uses its specialist knowledge to assist Members by:

- creating best in class insurance solutions
- making the complex simple, and
- delivering an unparalleled customer experience for Members and their brokers.

The following four objectives have been identified as those which are used to guide the Club Boards' planning and oversight of the business.

- Deliver the capital strength and financial performance required by regulators, rating agencies and Members. In the case of the Club's rating agency this means maintaining the Club's current A- (Excellent) rating with AM Best
- Provide the Club's core products at a competitive, stable price and with an appropriate spread of risk
- Deliver value to Members and brokers through excellent underwriting risk assessment, claims handling and claims payment, loss prevention and overall service levels which differentiate the Club from its competition
- Maintain and enhance relationships with Members and brokers in order to maximise retention and growth, and form new relationships with intermediaries primarily in the retail broking market sector.

A.2 Underwriting performance

The Club's balance on the technical account was a surplus of US\$5.061 million in 2019 on a UK GAAP basis compared with a surplus of US\$15.033 million in 2018.

The table below shows a summary of the technical account extracted from the Club's consolidated financial statements.

Summary of technical account

	2019	2018
	US\$000s	US\$000s
Gross written premium	214,458	197,113
Reinsurance premium ceded	(59,019)	(56,650)
Change in provision for unearned premiums	(8,781)	(2,355)
Earned premiums, net of reinsurance	146,658	138,108
Allocated investment return transferred from the non-technical account and other technical income	12,119	1,847
Claims incurred, net of reinsurance	(82,893)	(71,354)
Net operating expenses	(70,823)	(53,568)
Balance on the technical account	5,061	15,033

The growth in the Club's gross written premium during 2019 of 9% was mainly due to organic growth and new business acquisition. The retention rate for 2019 was 96% (2018: 96%).

The 2019 financial year combined ratio was 98% (2018: 84%). During the year the Club incurred some exceptional costs in relation to a significant IT project as well as a one-off pension cost. Excluding these items the combined ratio falls from 98% to 87%. The development of prior policy year claims during 2019 was favourable on a Group basis resulting in a release of prior year reserves and margins of US\$9.3 million (2018: US\$25.4 million).

The balance on the technical account for TTI was a surplus of US\$2.575m in 2019 on a UK GAAP basis compared with a surplus of US\$1.895m in 2018.

The below table shows a summary of the technical account extracted from TTI's financial statements.

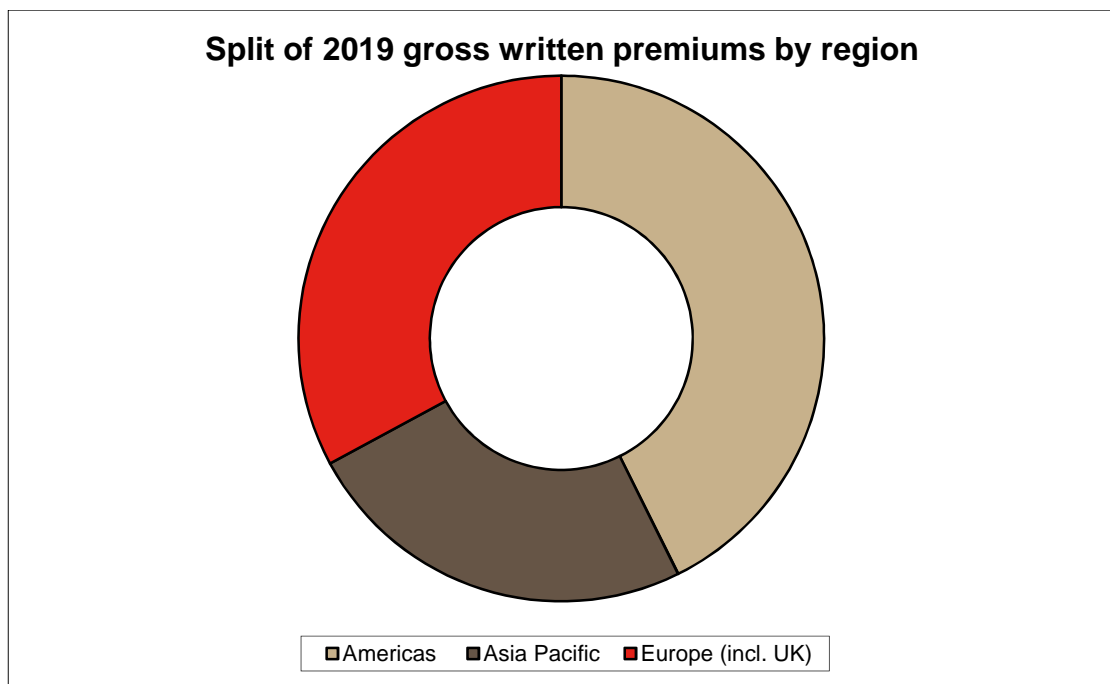
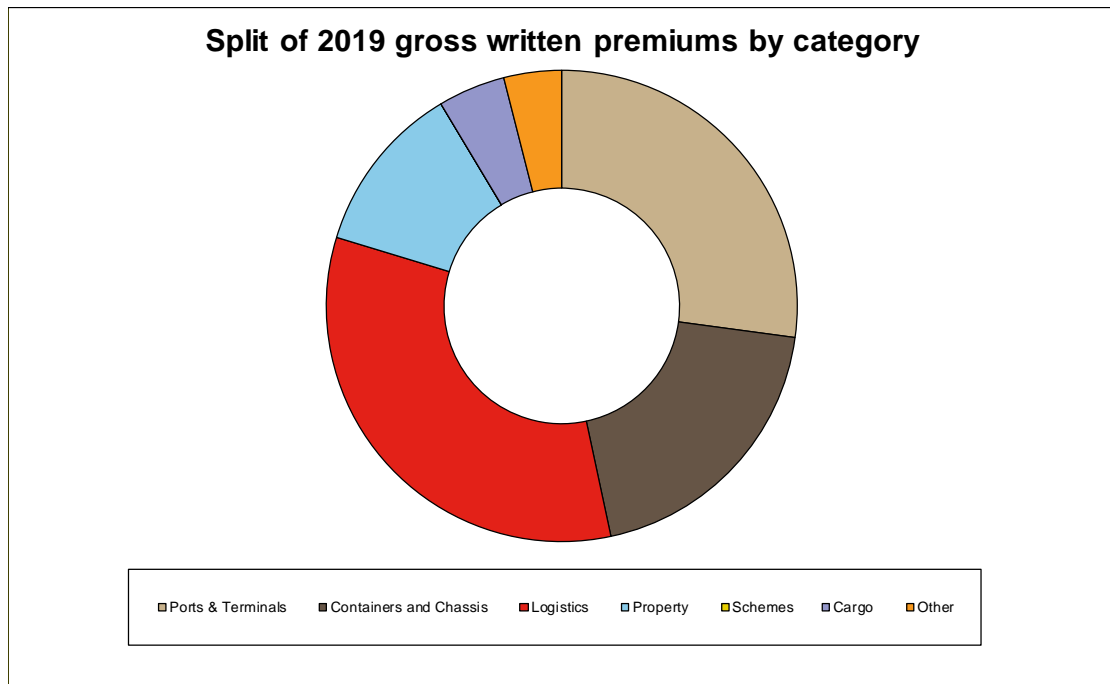
Summary of technical account

	2019	2018
	US\$000s	US\$000s
Gross written premium	201,972	186,227
Reinsurance premium ceded	(166,585)	(154,067)
Change in provision for unearned premiums	(1,803)	(350)
Earned premiums, net of reinsurance	33,584	31,810
Allocated investment return transferred from the non-technical account	951	(644)
Commission income, other technical income, net of reinsurance	30,329	16,485
Claims incurred, net of reinsurance	(8,019)	(5,831)
Realised gain on business transfer	2,926	-
Net operating expenses	(57,196)	(39,925)
Balance on the technical account	2,575	1,895

The Club's membership is drawn from three main categories of operator:

- Container and Chassis owners and lessees (where the cover offered is principally loss and damage to equipment and third party liabilities arising out of faulty equipment);
- Port and terminal operators (offering cover for contractual and third party liabilities as well as property and business interruption insurance); and
- Transport & Logistics operators (offering cover for contractual and third party liabilities).

The split of the Club's 2019 gross written premiums by category and also by geographical distribution is as follows:



For further information on TTI's underwriting performance by material line of business and geographical area refer to Quantitative Reporting Template ("QRT") s.05.01.02. and s.05.02.01 respectively which form part of the Club's annual regulatory reporting requirement.

The split of gross written premiums by Solvency II line of business was as follows: marine, aviation and transport - US\$102.948 million (51%), general liability – US\$63.724 million (32%), fire and other damage to property - US\$25.035 million (12%) and motor vehicle liability US\$10.264 million (5%). In 2018 the figures were: marine, aviation and transport - US\$94.790 million (51%), general liability – US\$55.026 million (30%), fire and other damage to property - US\$25.325 million (14%) and motor vehicle liability US\$11.087 million (5%)

The gross written premiums by home country (United Kingdom) and the top 5 other countries accounts for 60% of TTI's business (2018: 56%) and was split as follows: United Kingdom - US\$9.316 million (5%), United States – US\$78.869 million (39%), Hong Kong – US\$15.276 million (8%), Russia – US\$9.640 million (5%), Spain – US\$5.165 million (3%) and France – US\$5.025 million (2%). In 2018, the figures were: United Kingdom - US\$8.548 million (5%), United States – US\$57.719 million (31%), Hong Kong – US\$14.808 million (8%), Russia – US\$9.877 million (5%), Australia – US\$8.298 million (4%) and Denmark – US\$5.412 million (3%).

A.2.1 Risk mitigation

The Club manages its gross underwriting risk profile through the maintenance of a number of risk appetite statements which enable an aggregated view of the risks underwritten by the Club. These statements cover the spread and balance of the risks underwritten by category/sector, region, policy limit and premium size.

For asset risks (property and handling equipment), the Club maintains a specific system and a number of updated controls to monitor aggregations globally. This is used in conjunction with mapping software in order to manage aggregations in areas exposed to natural catastrophes.

The Club also purchases “Excess of Loss” reinsurance to protect it against exposure to large or catastrophic claims. In addition to this, the Club has a 25% whole account quota share reinsurance to manage its residual exposure, particular in relation to an increased number of claims.

The reinsurance arrangements are reviewed annually with reference to the Club's limit profile and Realistic Disaster Scenarios.

TTI has a 90% quota share reinsurance with TTB. Under this reinsurance contract 90% of TTI's retained risks, after recovery has been made from third party reinsurers, are reinsured by TTB. This reinsurance contract also includes a stop-loss element to protect TTI from an excessive accumulation of claims within its 10% retention.

TTI is in the process of establishing a licenced insurance subsidiary in the Netherlands through which it will write European Economic Area (“EEA”) business and administer all EEA Member policies. It is intended that this subsidiary will be in place and licensed in the latter half of 2020 and the application process continues to be on track to achieve this. It is anticipated that all non-UK EEA policies, including those written before the end of the transition period, will transfer to the new subsidiary at the end of 2020, or shortly thereafter. This is required by EU regulators and will take place after the completion of a court approval process in the UK. The process will be transparent to EEA Members who will continue to benefit from the strength of the Club's solvency and client services provided from London. This is intended to be the permanent solution for TTI when the UK leaves the EU. In what now appears to be a very unlikely scenario, the TTI Board has decided that in the event of the UK leaving the EU with no deal and before TTI has its own subsidiary in place, TTI will be fronted by UK P&I Club N.V. (“UKNV”), a business also managed by Thomas Miller and established for this

purpose in the Netherlands. Under these plans the TTI's EEA based business would be renewed into UKNV and reinsured to TTI. This would be a temporary solution and TTI will not use this option unless it is absolutely necessary to avoid incurring unnecessary expenditure.

A.3. Investment performance

In accordance with the Club's Investment Policy, its Investment Mandate is updated on a regular basis. The asset allocation established within the Mandate is principally determined to ensure that the Club's future cash flows arising from liabilities (primarily claims reserves) are matched by available assets of the correct currency and duration. Effective risk management is therefore the principal driver of investment allocation.

Having established a matched portfolio, the Club allocates surplus assets within the capital allotted to investment risk based on the Club's investment risk appetite. The Club seeks to achieve the best return available while limiting the risk accepted into the portfolio.

Factors that may influence future investment return are:

- Market performance – as affected by macro-economic, political or other factors
- Capital allocation and risk profile – determining the risk accepted into the portfolio
- Portfolio management – including asset allocation (both strategic and tactical)

A.3.1 Asset allocation

Investment return

The following table details the Club's investment return by asset class as reported in the Club's UK GAAP financial statements.

	2019	2018
	US\$000s	US\$000s
	Actual	Actual
Cash and deposits	332	305
Debt securities	13,357	8,555
Equities	10,525	(2,803)
Sub-total	24,214	6,057
Less: investment management fees	(1,344)	(1,246)
	<u>22,870</u>	<u>4,811</u>

The Club's overall return on its investment funds, excluding currency movements, was 5.5% before investment management fees. This compared to a return of 1.3% in 2018.

All of the Club's investment return in 2019 and 2018 was recognised in its income statement.

Investment performance in 2019 was very good helped by strong equity returns and good bond performance in particular in the US. In 2019 the S&P 500 gave a total return of 31%. In 2019, US Dollar cash returned 2.2%, US Treasuries (1-3 year) returned 3.6%, US Treasuries (5-7 year) returned 5.8% and US Dollar corporate bonds (1-3 year, AAA-A) 5.0%.

The breakdown of TTI's investment return by asset class as reported in its UK GAAP financial statements was as follows.

	2019 US\$000s Actual	2018 US\$000s Actual
Cash and deposits	215	312
Debt securities	3,400	1,821
Sub-total	<u>3,615</u>	<u>2,133</u>
Less: investment management fees	<u>(254)</u>	<u>(186)</u>
	<u><u>3,361</u></u>	<u><u>1,947</u></u>

Asset allocation

The following table details the Club's cash and investments by asset class as reported in the Club's UK GAAP financial statements.

	2019 US\$000s Actual	2018 US\$000s Actual
Cash at bank and in hand	46,695	51,177
Debt securities	383,305	380,564
Equities	46,735	41,809
UCITS	<u>10,938</u>	<u>10,127</u>
Total	<u><u>487,673</u></u>	<u><u>483,677</u></u>

At December 2019 the Club's cash and investments totalled US\$488 million.

The investment funds consisted of US\$100 million held in US Treasury Bills and AAA-rated cash funds, US\$283 million in other bonds, including floating rate notes and US\$47 million in equities.

The US equities represented 55% of the equity portfolio, the Euro-zone 19% and the UK 26%.

The average duration of the cash & fixed income portfolio was 1.1 years. The allocation to corporate bonds was US\$51 million.

The currency exposure of the Club's investment funds was in line with benchmark, with 84% in US Dollars, 11% in Euros and 4% in Sterling.

The breakdown of TTI's cash and investments by asset class as reported in its UK GAAP financial statements was as follows.

	2019 US\$000s Actual	2018 US\$000s Actual
Cash at bank and in hand	39,281	40,320
Debt securities	101,321	94,544
UCITS	5,977	5,118
Total	<u>146,575</u>	<u>139,982</u>

A.4. Performance of other activities

As noted in A.2. above, all of the Club's activities relate to its core business.

A.5. Any other information

Overall the Club produced a surplus of US\$16.021 million for the year ended 31 December 2019 resulting in an accumulated surplus of reserves of US\$225.541 million.

Overall TTI produced a surplus of US\$4.045m for the year ended 31 December 2019 resulting in an accumulated surplus and reserves of US\$66.894m.

Covid-19

The Directors have carried out an assessment of the impact of Covid-19 on TTI, which is a non-adjusting post balance sheet event. Covid-19 is unlikely to have a significant impact on TTI's own funds or its solvency ratio. The figures in the SFCR and appended Quantitative Reporting Templates have not been adjusted for Covid-19. The Directors are monitoring the impact of Covid-19 regularly.

At this stage TTI has experienced low levels of claims activity. Taking into consideration current laws and regulations, it is not expected that future claims activity will significantly impact the TTI's liquidity or solvency position. Premium volumes in certain classes will be impacted, however again, it is not expected that this will significantly impact TTI's liquidity or solvency position. Covid-19 will likely have a short term impact on investment valuations due to increased volatility of the financial markets. The TTI's investments mainly consist of US government bonds and there are no equity holdings, as a result, to date there has not been a significant impact on the TTI financial position and solvency.

Other than Covid-19 there have been no post balance sheet events.

B. System of Governance

B.1. General Information on the System of Governance

B.1.1 Overview

The Boards direct, and have responsibility for, all activities of each Club. The Board Directors of both TTB and TTI are drawn principally from the policyholder Members, although both Boards include Directors who are not drawn from the membership. These Directors hold specialist knowledge or executive responsibilities.

The Board of TTB consists of 24 Directors, mainly drawn from the Club membership but also including two specialist Directors (one in relation to investments and one in relation to finance). The Board of TTI consists of eight Directors, including one specialist Director (in relation to insurance) and two executive Directors (being the CEO and the Finance Director).

The Boards have outsourced the day to day management of the Club to third party managers. Thomas Miller (Bermuda) Limited and Through Transport Mutual Services (UK) Limited, collectively “the Managers”, provide management services to TTB and TTI respectively.

The Directors consider the system of governance to be adequate given the nature, scale and complexity of the risks inherent to the Associations. Further details on the Club’s key functions of risk management, compliance, internal audit and actuarial are included in sections B.3 to B.6.

The TTB and TTI Boards (the “Boards”) are supported by several committees.

B.1.1.1 Committee Structure

a. TTB Audit & Risk Committee (“TTB ARC”)

TTB ARC is responsible for monitoring the Club’s risk management system and risk profile against the Board’s risk appetite. The Committee oversees the risk function to ensure that risks are properly identified and assessed. It receives reports from the Risk Management Director in respect of new or emerging risks or changes to existing risks. TTB ARC also reviews the Own Solvency and Risk Assessment and recommends it for Board approval.

TTB ARC considers the internal control framework designed to mitigate identified risk and directs the internal audit function when assessing the effectiveness of these controls. TTB ARC also considers the internal audit plan, and receives internal and external audit reports.

b. TTI Audit & Risk Committee (“TTI ARC”)

TTI ARC performs the same duties for TTI that TTB ARC performs for the Group.

c. Nominations Committee

The Nominations Committee ensures that the Boards of TTB and TTI continue to be composed of suitably qualified and skilled individuals, including the appointment of specialist directors. It also makes recommendations to ensure that the Committees of the Boards of TTB and TTI are composed of individuals appropriate to the respective roles.

d. Investment Committee

The Investment Committee makes recommendations to the TTB Board in respect of the Investment Mandate and reviews in detail the performance of the investment portfolio.

e. TTB Discretions Committee

The TTB Discretions Committee was established to exercise discretions vested on the Directors of TTB pursuant to the Club Wordings. This is in relation to coverage disputes with members. The TTB Discretions Committee comprises the Directors of TTB who are also Directors of TTI and the Deputy Chairman of TTB.

f. TTI Discretions Committee

The TTI Discretions Committee was established to exercise discretions vested on the Directors of TTI pursuant to the Club Wordings. This is in relation to coverage disputes with members. The TTI Discretions Committee comprises the non-executive Directors of TTI.

Material changes

There were no material changes to the Club's system of governance during 2019.

B.1.1.2 Outsourcing

As noted in B.1.1 the Club outsources all functions, including controlled functions, to the Managers. The management outsourcing has been structured in compliance with relevant regulatory obligations and subject to Management Agreements.

The Boards maintain an outsourcing policy which sets out the controls in place in relation to the Management Agreements and all other outsourcing arrangements.

The Managers provide a governance framework to facilitate delivery of the Club's Business Plan whilst managing risks in accordance with the Club's risk management framework. The Managers operate through several committees, all of which report to the TT Senior Management Committee. These committees include risk; reserving; underwriting management; claims; management; policy and wordings; data governance and IT.

Further detail on outsourcing is set out in section B.7.

B.1.1.3 Key Functions

a. The Managers

The Club has no employees and as such the Boards rely on the Managers for the day-to-day management duties of the Club. The functions and responsibilities of the Managers are set out in the Management Agreements between the Managers and TTB and TTI.

The Boards may delegate a wide range of powers, duties and discretions to the Managers on such terms as it sees fit. The Managers have two executive Directors on the Board of TTI.

b. The Investment Managers

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

The functions and responsibilities of the Investment Managers are set out in the Management Agreements between the Investment Managers and the Clubs.

c. Management Responsibilities Map

The Club maintains a management responsibilities map that details the key Senior Manager Functions and Certified Functions. Per the management responsibilities map, the following functions are maintained with a prescribed set of responsibilities.

For TTI these are performed by:

- Chairman (Board)
- Chief Executive Officer (Managers)
- Chief Financial Officer (Managers)
- Chairman of Audit & Risk Committee (Board)
- Chief Actuary (Managers)
- Chief Risk Officer (Managers)
- Chief Underwriting officer (Managers)
- Claims Director (Managers)
- Chief Investment Officer (Managers)
- Compliance Officer (Managers)
- Head of Internal Audit (Managers)
- Chief Operating Officer (Managers)
- Group Entity Senior Manager/Deputy Chairman (Board)

B.1.2 Remuneration

Since the management of the Club is outsourced to the Managers, all employees are employed by the Managers.

In accordance with the Management Agreements, the Club pays a single management fee to the Managers for the services they provide. This management fee covers the Board approved budgeted costs of managing the Club, a fixed profit element and incentive fee based the Club's overall net result. The basis of the management fee is agreed by the Board and reviewed periodically.

The Managers are responsible for executive recruitment and performance management, ensuring that all staff have and maintain the relevant skills, knowledge and expertise necessary to perform their roles and responsibilities.

The Managers operate a formal performance and merit based remuneration policy aimed at paying competitive and appropriate remuneration, consistent with the long term interests of the business.

B.1.3 Related party transactions

The Club has no share capital and is controlled by the Members who are also policyholders. All of the policyholder Directors are representatives of Member companies and other than the insurance, which is arranged on an arm's length basis between the Member companies and the Club, the Directors have no financial interests in the Club.

B.1.4 Adequacy of the system of governance

The Directors consider the system to be adequate given the nature, scale and complexity of the risks inherent to the Club.

B.1.5 Reporting lines and responsibilities

The reporting lines for the Senior Management team are as follows:

Individual reference number (IRN)	Name	Regulatory status	Reporting line
CEF01034	Charles Edward Fenton	See TTI Board above	Chair
ESC01019	Ehsan Saif Chowdhury	See TTI Board above	CEO
KXK11403	Kevin King	Chief Operating Officer SMF 24 (PRA)	CEO
RXK09298	Robert Kempkens	Claims key function SMF18 (Other overall responsibility, FCA)	CEO
DJL01289	David John Lumby	Chief Underwriting Officer function SMF 23 (PRA)	CEO
IGR01012	Ian Gary Rosenthal	Compliance oversight SMF 16 (FCA) Compliance key function (PRA) Chief Risk Officer SMF 4 (PRA) <i>PR T-2</i>	Chair Audit & Risk Committee (and CFO for administration purposes)
NCD01036	Pritti Patel	Chief Actuary SMF 20 (PRA)	CEO
AXS04408	Andrew Steet	Head of Internal Audit SMF 5 (PRA)	Chair Audit & Risk Committee
MXC07177	Mike Carroll	Money Laundering Reporting Officer SMF 17 (FCA)	CEO

B.1.6. Board remuneration

Directors are paid an annual fee and an attendance fee for each meeting. There are no variable components to the Directors' remuneration.

The following table summarise the remuneration received by General Non-Executive Directors.

	Meeting attendance per day	Annual fee
TTI	-	£40,000
TTB	US\$2,500	US\$2,500

Specialist Directors receive an annual fixed fee of £45,000 and no attendance fees. The TTB Bermuda resident Director receives an annual fee of US\$10,000 plus a meeting attendance fee of US\$2,500 per day. The Chairman receives a fixed fee of

£90,000 and no attendance fees. Executive Directors who are employed by the Managers are not entitled to Directors' fees.

B.2. Fit and Proper Requirements

The Club has in place a Fit & Proper Policy that sets out its approach to the fitness and propriety of the persons responsible for running the Club. Further details of the Clubs' governance structure is set out above in sections B.1.1.3 and B.1.5.

The Fit & Proper Policy is reviewed annually and is approved by the Boards. It is owned by the Chief Executive Officer and incorporates the requirements of the Senior Managers' & Certification Regime (SM&CR). The policy applies to:

- Directors;
- Senior executives who effectively run the Club, comprising Senior Manager Functions approved under SM&CR; and
- Persons responsible for key functions, being those approved and certified under SM&CR.

B.2.1 Fitness

All persons within the scope of the Fit & Proper Policy must have professional qualifications where applicable, knowledge and experience, and demonstrate the sound judgement necessary to discharge their areas of responsibility competently. This applies both at the time of their appointment or employment and on a continuous basis to meet the changing or increasing requirements of their particular responsibilities and the business in general.

The level of fitness must be appropriate and proportionate to each person's role, tasks and responsibilities.

a. The Directors

In addition to individual Directors meeting their respective Fitness requirements, the Boards are to be composed in a way to ensure that their members collectively possess and continue to possess sufficient knowledge, competence and experience of:

- (i) the insurance and financial markets in which the Club operates;
- (ii) the Club's business model and business strategy;
- (iii) the Club's system of governance;
- (iv) the financial and actuarial analysis of the Club's data; and
- (v) the regulatory frameworks and requirements under which the Club operates.

b. Executive Management

The Managers maintain role specifications for all executive roles that are within the scope of this Policy which detail the key competencies and duties for each position. All persons to whom this Policy applies are required to have the appropriate and designated competencies for their positions.

The SM&CR rules do not require specific qualifications for persons engaged by the Club (as it is a wholesale general insurer), but these may nonetheless be required to fulfil a particular role.

B.2.2 Propriety

All persons who are within the scope of the Policy are subject to a propriety assessment. This includes consideration of that person's character, personal

behaviour and business conduct including any criminal, financial, supervisory aspects regardless of location.

The assessment includes any relevant evidence such as:

- criminal offences, including offences under the laws governing insurance activity, fraud or financial crime;
- disciplinary or administrative offences under legislation relating to companies, bankruptcy, insolvency or consumer protection;
- current investigations or enforcement actions by any relevant regulatory or professional body for non-compliance with any relevant provisions; and any other criminal offences that cast doubt on the integrity of the person.

B.2.3 Approach to assessment

All persons who are within the scope of the Policy are assessed against individual and collective Fitness requirements and Propriety standards. The purpose of the fit and proper assessment is to ensure that the person who is holding or may hold a position:

- has the qualities to perform their duties (competence, character, diligence, honesty, integrity and judgement);
- does not have a conflict of interest or avoids, to the extent possible, activities that could create conflicts of interest or the appearance of conflicts of interest; and
- is not otherwise disqualified from holding the position.

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

Propriety includes an assessment of the persons' reputation and past conduct.

B.3. Risk Management System Including the ORSA

B.3.1 Overview

The Clubs have established a robust risk management system appropriate for the risks to which the business is or could be exposed.

The Clubs' risk management system provides an integrated approach to risk management and the application of the three lines of defence:

- First line of defence: business units and all staff not included in the second and third lines of defence, process and risk owners, overseen by the Boards
- Second line of defence: risk management and compliance functions, overseen by the Audit & Risk Committees and the Boards
- Third line of defence: internal audit, overseen by the Audit & Risk Committees and the Boards

The overall risk management system includes:

- a clearly defined and well-documented risk management strategy;
- appropriate processes and procedures;
- appropriate reporting procedures;
- reports on the material risks faced by the Club and on the effectiveness of the risk management system; and

- policies or frameworks (see section B.3.2 below)

The risk management system maintains a coherent focus on data and IT infrastructure governance and appropriate policies and standards to outline the framework within which responsibilities will be exercised.

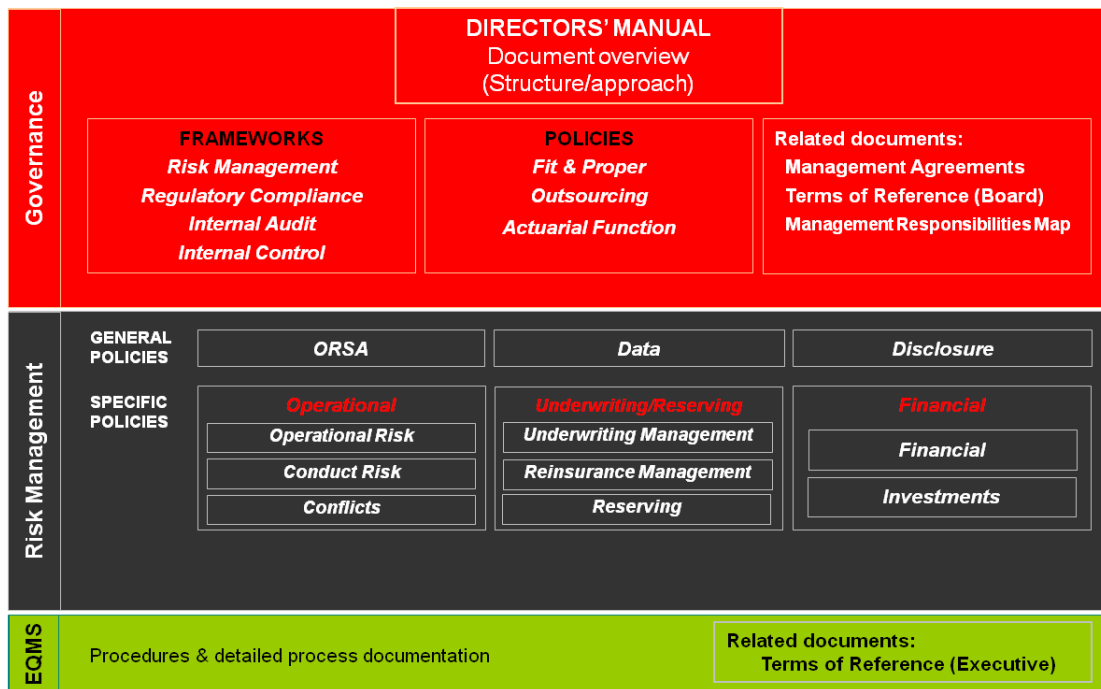
The core elements of the risk management system are set out in the following sections.

B.3.2 Risk Policies

The risk policies define the Club’s approach to the risk universe inherent in the business and establish the controls, procedures, limits and escalation to ensure that the risks are managed in line with the risk appetite.

A depiction of the structure of the Clubs’ governance and risk documentation is as follows:

TT Club Governance & Risk documentation matrix



“EQMS” is the Managers’ Electronic Quality Management System which holds all the Club’s process documents.

The governance and risk documentation is reviewed at least annually, and amendments approved as required by the Audit & Risk Committees and the Boards.

The Risk Management Framework is central and describes key aspects of the risk management process implemented by the Club to provide reasonable assurance regarding the achievement of its business plan objectives and identifies the main review and reporting procedures. It is further supported by policies covering individual risk categories and the Club’s Internal Control Framework.

B.3.3 Risk Appetites

Risk appetites are used to define the amount of risk that the Club is willing to accept in pursuit of value. The Boards determine the appropriate risk appetites aligned to the Club's business plan objectives. The high-level Risk Appetite Statements are reviewed as part of the business planning process and set out in the business plan.

The Risk Appetite Statements are owned by the Boards and reviewed on a regular basis as new risks emerge, and at least annually. The statements articulate the key risks arising from the Club's strategic objectives and the targets and tolerances in respect of the operations of the business in pursuit of these targets.

Performance against the risk appetite statements is reviewed by the Boards as part of the financial planning item at each meeting, using data to support decision-making processes. Reporting mechanisms ensure that the Boards are aware of movements, exceptions and breaches in relation to risk appetite statements.

Consideration of new or modified initiatives and business plan objectives is made in the context of the existing risk appetite statements.

The Audit & Risk Committees support the Boards by providing oversight of the Risk Management Function. The Risk Management Director in conjunction with the Managers' Executive Risk Committee fulfils the role of the Club's Risk Management Function and oversees risk management, provides independent challenge, and has direct access to the Chairmen of the Audit & Risk Committees.

B.3.4 Risk Log

Risks to the business that could inhibit the Club achieving its objectives are described and categorised in the Club's Risk Log, together with the consequences should a risk materialise. Potential root causes of the risk materialising as well as mitigation and controls implemented to prevent, detect or mitigate are listed alongside. The risks are assessed and monitored on an ongoing basis.

The list of risks included in the Risk Log has been compiled by the Boards and senior management of the Club based on their experience and expert judgement in running the business. These comprise the universe of risks faced by the business which, individually or in combination, may have a material impact on the Club.

A separate Emerging Risk Log is maintained and reviewed regularly; if any such risk materialises, it is added to the Risk Log and its impact on the Club assessed. Where necessary, scenario testing is conducted to understand the impact of the emerging risk.

Individual risks are allocated to Risk Owners within the Senior Management Team. The Risk Owners are the Chief Executive Officer, Chief Operating Officer, Finance Director, Underwriting Director and Claims Director.

In order to maintain an accurate register of the risks the Club faces or may face in the future, the Risk Owners monitor internal and external data feeds and information for emerging risks and deterioration of or change in risks already identified.

Their findings are reported to, and reviewed by, the Risk Management Director for inclusion in the Risk Log as appropriate. The Risk Management Director reports all proposed changes to the Audit & Risk Committees who then make an assessment and recommendation to the Boards for approval.

Internal loss events and near misses are reported to the Risk Management Director who reports such events to the Managers' Executive Risk Committee. Any matters of significance are then reported to the Audit & Risk Committees, and monitored for correlations, trends and contagion.

The Risk Log is reviewed regularly by the Managers and at least annually by the Audit & Risk Committees and submitted for approval by the Boards.

Risks identified in the Risk Log are categorised as follows:

- Strategic
- Underwriting/Reserving
- Financial
- Operational
- Regulatory compliance

All risks on the Risk Log are assessed on an ongoing basis and at least annually by the Managers and by the Audit & Risk Committees.

B.3.5 Own Risk and Solvency Assessment (“ORSA”)

The Club prepares an ORSA overview report at least once each year. The ORSA is the process used by the Club to manage its financial and solvency position over the period of its Business Plan. The ORSA overview report provides a summary of this process and is approved by the Boards. As such, it is an intrinsic part of the Club's business planning process.

The key elements of the ORSA process are:

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

The Audit & Risk Committees review the ORSA and recommend it for approval and use by the Boards.

The Boards review the ORSA and consider appropriate action such as:

- Capital related decisions
- Reassessment of risk profile and risk appetite
- Additional risk mitigating actions
- Analysing key business decisions
- Assessing the effectiveness of reinsurance

The assessments to date indicate that the Club is sufficiently capitalised.

B.4. Internal Control System

Internal control is defined as a continually operating process effected by the Boards, the Audit & Risk Committees, the Managers, all staff and systems and designed to support the Club in achieving its Business Plan objectives through efficient and effective operations and to protect its resources.

Each Risk Owner is responsible for the application of the Internal Control Framework and the design, development, implementation, documentation and maintenance of effective internal control processes in their area and reporting thereon.

B.4.1 Control activities

Control activities are the actions taken or systems put in place to address business risks, protect assets and ensure that all material control failures and issues are identified and managed. The control activities are embedded into plans, policies, procedures, systems and business processes. Their effectiveness relies on the level of compliance by management and staff.

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

The following controls are examples of the internal control framework:

- Policies and procedures
- Management information
- System embedded controls
- Premises and System security
- Segregation of duties
- Management review
- Information processing
- Validation and reconciliation
- Recruitment, performance management and training
- Contingency plans

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

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

Reports are made to the Audit & Risk Committees and the Club's Boards evaluating the design and operational effectiveness of the Internal Control Framework, processes and procedures on an ongoing basis, following up on deficiencies and advising on areas for improvement.

B.4.2 Control environment

The Managers are responsible for establishing and maintaining an effective control environment throughout the organisation. In furtherance of that, there is a culture which values the highest levels of integrity in the staff, together with openness and

honesty in relation to the conduct and reporting of all activities. Policies, procedures and processes are designed to define and support effective, efficient and appropriate activities at every level of the business.

In order to help ensure that the Club's business plan is achieved or surpassed when the opportunity arises, risks are considered and assessed on a regular basis and proportionate and cost-effective controls put in place to prevent, detect and mitigate crystallisation or to maximise opportunities when they occur. The Internal Audit function considers and tests these as part of its rolling audit plan (see section B.5 below).

Reporting procedures ensure that information relating to regulatory compliance risk is reported through the business. Management Information is actively monitored and assessed by the Compliance Function, the Senior Management Committee, the Audit & Risk Committees and the Boards.

B.4.3 Compliance function

The Compliance Function reports regularly to the Senior Management Committee and to the Audit & Risk Committees in order to identify, assess, monitor, report and manage the regulatory compliance requirements and risks to which the Club is exposed.

The Audit & Risk Committees will seek assurance and provide, through the processes set out in the Regulatory Compliance Framework or through internal audit, assurance to the Boards that the scope and quality of the Managers' compliance monitoring and reporting on regulatory compliance are sufficient to ensure the effectiveness of this framework and of the management of regulatory compliance risk. All reviews are carried out at least annually and ad hoc as circumstances require.

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

Regulatory developments are monitored for impact on the Club by the Compliance function. Any amended or new regulations that have a material impact on the Club are recorded in the Regulatory Compliance Manual. Monitoring consists of checks to ensure that required actions are being/have been taken and that policies, processes and procedures are being complied with. The results are logged, reported on to stakeholders and remedial action agreed and implemented as appropriate.

Breaches and associated remedial action are posted to the Operational Risk Database. The Compliance Function will alert any regulatory breach, including where applicable, the cause, effect and recommended remedial action, to the Managers' Risk Committee which will approve the remedial action. Material breaches and breaches that must be reported to regulators on a mandatory basis will be reported to the Audit & Risk Committees and the Boards.

B.5. Internal Audit Function

Internal Audit is the "third line of defence" in a company's internal control framework, established to provide independent assurance that the business controls set up by management ("first line") and the monitoring and oversight provided by the Risk Management and Compliance Functions ("second line") are working effectively.

The objectives of the Internal Audit Function are to provide assurance that business risks are recognised and are being well managed and controlled by effective systems and controls.

The internal audit function is provided by the Managers but the majority of audits are performed by a professional firm able to access the necessary variety of skills.

B.5.1 Independence

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

B.5.2 Development of plans

A dynamic three year rolling plan of audit reviews is developed for and approved by the Audit & Risk Committees. The plan is reviewed, reassessed and reapproved on at least an annual basis by the Audit & Risk Committees in order to ensure that it remains consistent with proposed and/or actual changes in business strategies, new developments and/or plans, as well as changes in risk profile and emerging risks.

B.5.3 Planning

The Internal Audit Function prepares an Audit Planning Memorandum (“APM”) for each audit, including a budget based on the time required for the audit, with input from management, any third party contractor and the Audit & Risk Committees. Once agreed, the APM forms the basis of the review to be performed

B.5.4 Execution & Reporting

The audit team is responsible for conducting the fieldwork investigation and testing with assistance from the Internal Audit Function on request. The Internal Audit Function will discuss any findings as they arise with management to ensure that any misunderstandings or queries are dealt with as soon as possible.

B.6. Actuarial Function

The Boards are ultimately responsible for ensuring an effective Actuarial Function. This function is performed by the Thomas Miller Actuarial Team, led by its Chief Actuary.

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

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

- coordinating the calculation of technical provisions, ensuring they are reliable and appropriate;
- ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
- expressing an opinion on the Club’s overall Underwriting Mandate and on the adequacy of reinsurance arrangements; and
- contributing to the effective implementation of the risk management system including capital requirements and the ORSA process.

The Clubs’ Actuarial Function compiles an Actuarial Function report for the Boards on at least an annual basis.

B.7. Outsourcing

Reference is made to sections B.1.1 and B.1.1.2 in relation to the Club's outsourcing policy, and the controls in place in relation to the Management Agreements and all other outsourcing arrangements. The remainder of the Outsourcing Policy is directed at services or activities which are particularly important or critical to the Club's business (material business activities).

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

A material business activity is one that has the potential, if disrupted, to have a significant impact on the Club's business operations or its ability to manage risks effectively.

The Club has offices in United Kingdom, Hong Kong, Singapore, Australia and the United States of America, to which all outsourcing arrangements apply.

B.7.1 Management outsourcing

The Club has no internal executive function and its management is wholly outsourced to Through Transport Mutual Services (UK) Limited and Thomas Miller (Bermuda) Limited (the "Managers") under Management Agreements.

In order to comply with its regulatory obligations, the Boards have developed monitoring and reporting procedures and have delegated to the Audit & Risk Committees to monitor internal controls and risk. The risk control and reporting procedures to be followed by the Managers form part of their obligations under the Management Agreements. The Committees report to the Boards.

B.7.2 Investment management outsourcing

Management of the Clubs' investments is outsourced to Thomas Miller Investment Limited and Thomas Miller Investment (IOM) Limited, part of the Thomas Miller group, under investment management agreements.

The performance of the investment managers is monitored and supervised by the Boards and the Investment Committee.

B.7.3 Internal audit outsourcing

The Club's internal audit function is outsourced to Thomas Miller Internal Audit. Internal Audit is supervised by the Audit & Risk Committees and the Boards.

B.7.4 Oversight

The Boards bear ultimate responsibility for outsourced functions, services, or activities and related governance. The Boards are supported by the Audit & Risk Committees which review outsourcing arrangements and the Managers' Senior Management Committee which monitors the activities of the business, including outsourcing.

B.8. Any Other Information

The impact of Covid-19 on the Club's operations and its financial position continues to be monitored very closely by the Club's Board and its managers. During periods of uncertainty like Covid-19 TTI increases the frequency of monitoring its capital and liquidity positions. TTI also carries out stress and scenario testing, and has run quantitative and qualitative scenarios to better understand the impacts of Covid-19 on the wider business as well as market, liquidity, operational, and capital risks.

The Club's managers, Thomas Miller, have put in place remote working for all its offices serving the Club. This transition to remote working has gone smoothly with the Club maintaining its very high standards of service throughout the organisation.

The Club considers there is no further material information to be disclosed.

C. Risk Profile

The key areas of risk impacting the Club can be classified as follows:

1. Insurance risk – incorporating underwriting and reserving risk
2. Market risk – incorporating investment risk, interest rate risk and currency rate risk
3. Credit risk – being the risk that a counterparty is unable to pay amounts in full when due
4. Liquidity risk – being the risk that cash may not be available to pay obligations as they fall due
5. Operational risk – being the risk of failure of internal processes or controls.

The Boards have established risk appetites in relation to the Club's business strategy and available resources. The Boards seek to maximise its resources by effective risk management techniques. Therefore a risk management system has been developed to identify and mitigate risk.

Section E.2. includes a breakdown of TTI's Solvency Capital Requirement by risk type.

C.1. Underwriting Risk

The Club is a marine aviation and transport insurer, underwriting only transport and logistics risks.

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

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

The Boards consider that the liability for insurance claims recognised in the statement of financial position is adequate. However, actual experience will differ from the expected outcome.

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

Underwriting risk is most sensitive to an increase in expected claims costs. For example, a 5% increase in TTI's net outstanding claims would reduce its accounting surplus by US\$1.2 million. A 5% decrease would have an equal, but opposite effect. This 5% change in net outstanding claims is equivalent to 3% of the SCR. The key risk mitigation in relation to underwriting risk is TTI's reinsurance programme and in particular its reinsurance with TTB (see section A.2.1). Given the reinsurance programme in place with TTB, TTI has a lower exposure to underwriting risk and, as a consequence, sensitivity to this risk.

C.2. Market Risk

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

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

The prudent person principle

Under the Club's Investment Policy, all investments are invested and managed in accordance with the 'prudent person principle', meaning that duties of the Investment Managers are discharged with the care, skill, prudence and diligence that a prudent person acting in a like capacity would use in the conduct of an enterprise of like character and aims. More specifically the assets are invested as follows:

- only in assets and instruments whose risk can properly be identified, measured, monitored, managed, controlled and reported;
- in such a manner as to ensure the security, quality and liquidity of the portfolio as a whole;
- in a manner appropriate to the nature, currency and duration of the Club's insurance liabilities;
- the use of derivative instruments are possible insofar as they contribute to a reduction of risks or efficient portfolio management;
- investments and assets which are not admitted to trading on a regulated financial market are kept to Risk Appetite levels;
- properly diversified in such a way as to avoid excessive reliance on any particular asset, issuer or group of undertakings, or geographical area and excessive accumulation of risk in the portfolio as a whole.

The Club's funds are invested by the Investment Managers in accordance with parameters set by an Investment Mandate. The Investment Mandate provides a framework to the Investment Managers for the management and stewardship of the Club's investment assets in conformity with the business and investment objectives and sets the parameters within which the Club's assets may be invested. It is considered and approved by the Boards on an annual basis and ad hoc as

required and is subject to the Club's Investment Policy. The Investment Managers report to the TTB Board at each meeting.

C.3. Credit Risk

Credit risk is the risk of loss in the value of financial assets due to counterparties failing to meet all or part of their obligations.

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

The Club is exposed to credit risk from a counterparty failing to comply with their obligations under a contract of reinsurance. In order to manage this risk the Boards consider the financial position of significant counterparties on a regular basis, the Senior Management Committee monitors aggregate exposure to each reinsurer and the Club has set selection criteria whereby each reinsurer is required to hold a credit rating greater than or equal to "A-" at the time the contract is made.

Amounts due from Members represents premium owing to the Club in respect of insurance business written. The Club manages the risk of Member default through a screening process to ensure the quality of new entrants to the Club and the ability to cancel cover and outstanding claims to Members that fail to settle amounts payable. The Club limits its reliance on any single Member.

Exposure to bank balances, however, is more concentrated, with two main counterparties and the risk is mitigated by placing funds surplus to normal operational requirements in money market funds and other investments.

C.4. Liquidity Risk

Liquidity risk is the risk that cash may not be available to pay obligations as they fall due. The Club has adopted an investment policy which requires the maintenance of significant holdings in short term deposits to ensure sufficient funds are available to cover anticipated liabilities and unexpected levels of demand. Short term cash needs are monitored to ensure the most efficient investment of cash balances.

The amount of expected profits included in future premium as per the Solvency II balance sheet is US\$31.2 million.

C.5. Operational Risk

Operational Risk is defined as direct or indirect losses arising from inadequate or failed internal processes, personnel or systems, or from external events. The Club has established an Operational Risk Policy that sets out the processes and controls in place in the business.

Mitigation of these risks is managed in the following generic ways:

- Processes are documented, training provided and functional reviews carried out to ensure compliance.
- Procedures are in place to manage recruitment, training and appraisal of all staff. Outsourced service providers are also managed, including reviews and MI relating to their performance of operational tasks.

- Applications used in business processes contain relevant mandatory fields, pre-defined reference data, validation and conditional inputs.
- Consideration of external events, including reports of loss/near miss events to which the business could be exposed and emerging risks.

Furthermore, potential internal loss/near miss events are captured and recorded in the minutes of regular regional/ functional meetings. Risk-based reports, including any potential loss/near miss events identified, are prepared by Risk Owners and functional heads for review and consideration by the Executive Risk Committee.

C.6. Other Material Risks

The Club has not identified any other material risk that it considers necessary for disclosure.

C.7. Any Other Information

The emergence of Covid-19 in 2020 and its development into a global pandemic represents a change to the external risk environment.

As noted in section A.5. TTI has experienced low levels of Covid-19 related claims activity and it is not expected that future claims activity will significantly impact the Club's liquidity or solvency position.

Premium volumes in certain classes will be impacted, however again, it is not expected that this will significantly impact the Club's liquidity or solvency position.

Covid-19 will likely have a short term impact on investment valuations due to increased volatility of the financial markets. TTI's investments mainly consist of US government bonds and there are no equity holdings, as a result, to date there has not been a significant impact on the TTI financial position and solvency.

TTI has not identified any other material information that it considers necessary for disclosure.

D. Valuation for Solvency Purposes

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

Materially all of the valuation differences between the Solvency II balance sheet and the current accounting balance sheet relate to the valuation of insurance liabilities ("technical provisions") and reallocation of insurance related balances to technical provisions.

A summary of the Solvency II balance sheet for TTI as at 31 December 2019 compared with UK GAAP financial statements balance sheet is shown below.

2019	2019	2018	2018
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	Solvency II basis	GAAP basis	Solvency II basis	GAAP basis
Assets	US\$000s	US\$000s	US\$000s	US\$000s
Investments and cash	147,275	147,275	140,509	139,982
Insurance and intermediaries / reinsurance receivables	11,740	50,454	18,894	54,176
Reinsurance recoverables	220,640	328,993	213,734	320,328
Other	979	980	208	735
	380,634	534,972	373,345	515,221
Liabilities				
Technical provisions	260,560	364,152	257,834	354,429
Reinsurance payables	41,111	100,444	45,253	94,637
Payables (trade not insurance)	1,162	1,162	869	869
Other	2,320	2,320	2,439	2,437
	305,154	468,078	306,395	452,372
Own funds / surplus and reserves	75,480	66,894	66,950	62,849

The Solvency II balance sheet is presented in S.02.01.02

D.1. Assets

Investments and cash

Assets including all of the investments of TTI are classified as fair value through the profit and loss.

Investments are included in the Balance Sheet at market value translated at year end rates of exchange. The market value of listed investments is based on current bid prices as at the balance sheet date.

The costs of investments denominated in currencies other than US dollars are translated into US dollars on the date of purchase. Any subsequent changes in value, whether arising from market value or exchange rate movements, are charged or credited to the Income Statement and are then accumulated within the Investment Revaluation Reserve until realised. The movement in unrealised investment gains and losses includes the reversal of previously recognised unrealised gains and losses on investments disposed of in the current period.

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

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

All of TTI's investments consist of government and corporate bonds which are traded in active markets. TTI also holds cash and UCITs (Undertakings for Collective Investments of Transferable Securities). The latter is held as an alternative to short term cash deposits. These are short term, highly liquid investments that can be readily converted to cash.

There are no material differences between the valuation under Solvency II purposes and the valuation under UK GAAP, as reflected in TTI's financial statements.

Insurance and intermediaries receivables

These represent balances that are due for existing insurance contracts. Due to the short term nature of these balances, the carrying amount is considered to be a suitable proxy for its fair value. These balances are reviewed for impairment and a provision is created against any balance that may be impaired.

When these amounts are not yet due, they are included as a future cash flow in the calculation of technical provisions.

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

Reinsurance receivables

These amounts are balances that are due to be recovered from existing reinsurance arrangements over the short-term. Little to no uncertainty exists as to the timing or amount of the recovery. Due to the short term nature of these balances, the carrying amount is considered to be a suitable proxy for its fair value.

If required, TTI makes allowance for expected credit default of reinsurance counterparties. Currently no such allowances are made.

When these amounts are not yet due, they are included as a future cash flow in the calculation of technical provisions. All items due for payment are shown as a line item on the face of the Solvency II balance sheet.

Under United Kingdom statutory accounting requirements, all amounts, whether due or not yet due, are shown as a separate line item on the face of the balance sheet.

Other

This balance includes sundry short term receivable balances, the value and settlement of which contains little to no uncertainty. Due to the short-term nature of these items, the carrying amount is considered to be a suitable proxy for its fair value. There are no material differences between the valuation under Solvency II purposes and the valuation under UK GAAP, as reflected in TTI's financial statements.

Note: Reinsurance recoverables is discussed within D.2. Technical Provisions section below

D.2. Technical Provisions

The tables below show the Solvency II technical provisions by line of business for 2019 and 2018:

2019	Motor vehicle liability Insurance \$000s	Marine, aviation and transport Insurance \$000s	Fire and other damage to property Insurance \$000s	General Insurance \$000s	Total \$000s
Gross technical provision (including risk margin)	6,304	128,043	4,397	121,817	260,561
Reinsurance technical provision	6,499	111,787	2,415	99,938	220,640

2018	Motor vehicle liability insurance \$000s	Marine, aviation and transport insurance \$000s	Fire and other damage to property insurance \$000s	General liability insurance \$000s	Total \$000s
Gross technical provisions (including risk margin)	6,654	125,746	8,565	116,869	257,834
Reinsurance technical provisions	7,226	107,861	5,830	92,817	213,734

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

The “best estimate” is made up of two key elements:

- The “claims provision”, which relates to claim events that have already occurred, regardless of whether the claims arising from these events have been reported or not.
- The “premium provision” which relates to future claim events covered by insurance policies which are already bound (i.e. a contract already exists between the Club and its policyholders) by the valuation date. This includes both the unexpired portion of existing policies and the policies which are bound but for which the policy has not yet inceptioned.

Standard actuarial techniques are used to project claims cash flows including chain ladder and Bornhuetter-Ferguson methods. The key assumptions relate to the initial expected claims cost for each policy year and the projected notified claims development pattern. These methods are considered appropriate given the longevity and stability of the Club and its claims handling processes. Allowance is also made for claims relating to the premium provision. These are valued using the Club's business plan. The future claims cash flows are the most uncertain element of the technical provisions. The uncertainty involved was discussed in Section C.1. on Underwriting Risk. The main sources that give rise to the uncertainty of future claims cash flows are as follows:

- changes in development patterns and average settlements for bodily injury claims, given their long tail nature;
- changes in the number and severity of large claims (above US\$250,000) as these tend to be more infrequent and therefore more volatile; and
- changes in the economic environment.

The risk margin is calculated based on the requirement to hold capital to meet the SCR until all claims liabilities are settled and a prescribed cost-of-capital rate of 6% per annum. This calculation is based on the assumption that a "reference undertaking" takes on the insurance obligations (and associated reinsurance arrangements). The SCRs in future time periods have been assumed to be directly proportional to the best estimate claims liabilities net of reinsurance recoverables at those points in time.

A reconciliation of UK GAAP technical provisions to Solvency II technical provisions and a line by line explanation is included below.

2019	Notes	Gross \$000s	Reinsurance \$000s	Net \$000s
GAAP technical provisions (including UPR)		364,171	329,012	35,159
Eliminate contingency margin	1	(31,530)	(28,977)	(2,553)
Eliminate unearned premium provision	2	(75,163)	(63,005)	(12,157)
Reallocate reinsurance amounts not yet due	3	(38,715)	(59,331)	20,616
Adjustment to expense management reserve	4	7,724	-	7,724
Premium provision premium amounts	5	(95,552)	(63,874)	(31,678)
Premium provision claim and expense amounts	5	130,238	111,503	18,737
Reinsurance counterparty default adjustment	6	-	(187)	187
ENID adjustment	7	3,862	3,555	307
Other			70	(70)
Effects of discounting	8	(9,412)	(8,128)	(1,284)
Solvency II technical provisions before risk margin		255,625	220,639	34,987
Risk Margin	1	4,934	-	4,934
Total Solvency II technical provisions		260,559	220,639	39,922

1. Contingency margin and Solvency II risk margin

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

2. Unearned premium

The Solvency II balance sheet contains no concept of deferral of premium, and as such any such balances are eliminated upon transition to the Solvency II balance sheet. These balances are replaced by a provision for future cash flows expected on unexpired business as further discussed in 5 below.

3. Reallocation of amounts not yet due

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

4. Adjustment to expense reserve

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

5. Provision for unexpired contracts and contracts bound but not incepted

Solvency II valuation methodology requires an insurer to estimate the cash flows on future coverage that the insurer will provide. This includes the unexpired portion of existing contracts and contracts that have been bound, but for which coverage has not yet incepted. These contracts are to be recognised when the insurer becomes party to the contract which is usually when the contract between undertaking and policyholder is legally formalised. All of these amounts are recognised under premium provisions and include unexpired amounts not yet due previously recognised on the UK GAAP balance sheet as debtors or creditors.

6. Reinsurance counterparty default adjustment

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

7. Events not in Data ('ENID') adjustment

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

8. Effects of discounting

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

The matching adjustment, volatility adjustment and transitional provisions have not been used.

Appendix S.17.01.02 shows full details of TTI technical provisions as reported in TTI's annual QRT reports.

D.3. Other liabilities

Reinsurance payables

These represent balances that are due to be paid for existing reinsurance contracts.

When these amounts are not yet due to be paid, they are included as a future cash flow in the calculation of reinsurance technical provisions.

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

Payables (trade, not insurance)

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

There are no material differences between the valuation under Solvency II purposes and the valuation under UK GAAP, as reflected in TTI's financial statements.

Any other liabilities not elsewhere shown

These include reinsurance balances due to TTB. These amounts are reallocated to technical provisions when not yet due. Under statutory accounting requirements all amounts, whether due or not yet due, are shown as a separate line item on the face of the balance sheet.

There are no material differences between the valuation under Solvency II purposes and the valuation under UK GAAP, as reflected in TTI's financial statements.

D.4. Alternative methods of valuation

TTI does not utilise any alternative methods of valuation.

D.5. Any other information

There is no significant impact to date of Covid-19 on the valuation of TTI assets and liabilities.

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

E. Capital Management

E.1 Own funds

As a mutual insurance company with no share capital TTI's own funds consist only of its accumulated surplus and reserves and reconciliation reserve, which are fully unrestricted and meet all the requirements of Tier 1 capital and count as Basic Own Funds. These funds may be fully utilised to meet both the Solvency Capital Requirement ("SCR") and the Minimum Capital Requirement ("MCR").

TTI's solvency coverage of the SCR and MCR as at 31 December 2019 is shown in the table below.

	2019 US\$000s	2018 US\$000s
Eligible own funds	75,480	66,950
SCR	41,066	39,116
Excess over SCR	<u>34,414</u>	<u>27,834</u>
Solvency ratio	184%	171%
Eligible own funds	75,480	66,950
MCR	10,266	9,779
Excess over MCR	<u>65,214</u>	<u>57,171</u>
Solvency Ratio	735%	684%

Appendix S.23.01.01 shows full details of own funds as reported in the TTI's annual QRT reports.

The below table shows a reconciliation of UK GAAP equity reserves to Solvency II basic own funds.

	2019 \$000s	2018 \$000s
GAAP surplus and reserves	66,894	62,849
Solvency II gross technical provisions adjustment	103,610	96,595
<i>Of which</i>	(38,714)	(34,929)
- Reallocation of amounts not yet due		
Solvency II RI technical provisions adjustment	(108,443)	(106,597)
<i>Of which</i>		
- Reallocation of amounts not yet due	59,330	55,326
Net technical provisions adjustment	<u>15,782</u>	<u>10,395</u>
Eliminate deferred acquisition costs	(7,270)	(6,294)
Total Solvency II basic own funds	<u><u>75,480</u></u>	<u><u>66,950</u></u>

The most material adjustment to reserves is as a result of the differences in valuation of technical provisions. Refer to D.2. for a discussion of the differences between the bases.

TTI's capital management objective is to maintain sufficient capital resources to exceed its SCR such that the probability of falling below its SCR is less than 10% (1 in 10) over one year, ignoring management actions. This objective is defined in TTI's capital risk appetite statement.

At a consolidated level the Club's overall capital management objective is to maintain sufficient capital resources such that the probability of breaching the Club's AM Best minimum capital requirement for an A- rating is less than 10% (1 in 10) over one year, ignoring management actions.

The forecasts for both TTI's and the Club's capital are prepared over a three year planning horizon with the current Business Plan covering the period 2019-2021.

Both TTI and the Club met their capital management objectives as at 31 December 2019 and are forecasting to continue to meet them in the period 2019-2021.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

The table below sets out the SCR results as at 31 December 2019 for TTI on a solo entity basis.

\$000s	31 Dec 2019	31 Dec 2018
Solvency Capital Requirement	41,066	39,116
Non-life Underwriting Risk	18,062	16,148
<i>Premium & Reserve Risk</i>	<i>15,112</i>	<i>14,504</i>
<i>Catastrophe Risk</i>	<i>1,730</i>	<i>1,359</i>
<i>Lapse Risk</i>	<i>9,045</i>	<i>6,220</i>
<i>Diversification</i>	<i>(7,825)</i>	<i>(5,935)</i>
Market Risk	7,772	8,272
<i>Interest Rate Risk</i>	<i>614</i>	<i>1,938</i>
<i>Equity Risk</i>	<i>-</i>	<i>-</i>
<i>Property Risk</i>	<i>54</i>	<i>-</i>
<i>Spread Risk</i>	<i>288</i>	<i>264</i>
<i>Concentration Risk</i>	<i>243</i>	<i>272</i>
<i>Currency Risk</i>	<i>7,502</i>	<i>7,501</i>
<i>Diversification</i>	<i>(929)</i>	<i>(1,703)</i>
Counterparty Default Risk	16,936	16,292
<i>Type 1</i>	<i>13,022</i>	<i>11,950</i>
<i>Type 2</i>	<i>4,816</i>	<i>5,284</i>
<i>Diversification</i>	<i>(902)</i>	<i>(942)</i>
Operational Risk	7,669	7,622
Diversification	(9,373)	(9,218)
Eligible Own Funds	75,479	66,950
Tier 1	75,479	66,950
Tier 2	-	-
Capital Adequacy Ratio	184%	171%

As shown in the table, TTI has sufficient capital to meet its SCR as at 31 December 2019 with a capital adequacy ratio of 184%.

The main risks that drive the SCR are underwriting risk and counterparty default risk. This is expected given that insurance is TTI's main activity. Also there is the additional counterparty default risk arising from the 90% quota share reinsurance arrangement with TTB.

The overall SCR has increased by US\$1.95 million since last year. The increase in the SCR is driven by increases in underwriting risk (particularly lapse risk) and counterparty default risk. There is an increase in the volume of premium bound at the year-end date compared to last year due to the cycle of policy renewals. As this business is expected to give rise to a greater surplus this results in an increase in the risk of lapse for TTI. Furthermore, this increased volume of business results in an increase in expected reinsurance recoveries increasing the counterparty default risk that TTI is exposed to.

The MCR for TTI as at 31 December 2019 is US\$10.3 million. Therefore this capital requirement was met as at 31 December 2019.

Appendix S.25.01.21 and S.28.01.01 show full details on the MCR and SCR, including the inputs into these calculations, as reported in TTI's annual QRT reports.

The table below shows the inputs into the MCR calculation as at 31 December 2018 and 31 December 2019:

	31 Dec 2019	Movement in	31 Dec 2018
	\$000s	2019	\$000s
Absolute MCR	4,127	(61)	4,188
Linear MCR	8,162	(69)	8,231
SCR	41,066	(1,950)	39,116
Combined MCR	10,266	(392)	9,779
MCR	10,266	(392)	9,779

- Net (of reinsurance) written premiums in the last 12 months: US\$ 35.4m
- Net (of reinsurance/SPV) best estimate and TP calculated as a whole: US\$35.3m (Solvency II basis)

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

This sub-module is not used by the TTI.

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

TTI uses the standard formula for its Solvency Capital Requirement.

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

TTI has fully complied with the SCR and MCR requirements during the period under review.

Refer to section E.1. for results of the SCR / MCR Calculations

E.6 Any other information

As noted in section C.7. the Covid-19 outbreak has led to increased financial market volatility which has impacted investment valuations particularly equity values. However as TTI's investment holdings are mainly in US government bonds, based on investment valuations as at 8 May 2020, TTI's overall investment return since 31 December 2019 has been positive and amounted to US\$1.96 million (unaudited) (or 1.81% (unaudited)).

Covid-19 is unlikely to have a significant impact on TTI's underwriting or technical performance for 2020.

Therefore Covid-19 is unlikely to have a significant impact on TTI's owns funds or solvency ratio for 2020.

TTI considers there to be no other material information that should be disclosed.

F. Appendices

TT CLUB MUTUAL INSURANCE LIMITED

Solvency and Financial Condition Report

Disclosures

31 December

2019

(Monetary amounts in USD thousands)

General information

Undertaking name	TT CLUB MUTUAL INSURANCE LIMITED
Undertaking identification code	213800XMGISANRAGT477
Type of code of undertaking	LEI
Type of undertaking	Non-life undertakings
Country of authorisation	GB
Language of reporting	en
Reporting reference date	31 December 2019
Currency used for reporting	USD
Accounting standards	Local GAAP
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

- S.02.01.02 - Balance sheet
- S.05.01.02 - Premiums, claims and expenses by line of business
- S.05.02.01 - Premiums, claims and expenses by country
- S.17.01.02 - Non-Life Technical Provisions
- S.19.01.21 - Non-Life insurance claims
- S.23.01.01 - Own Funds
- S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula
- S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

S.02.01.02

Balance sheet

		Solvency II value
		C0010
Assets		
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	45
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	107,993
R0080	<i>Property (other than for own use)</i>	215
R0090	<i>Holdings in related undertakings, including participations</i>	0
R0100	<i>Equities</i>	0
R0110	<i>Equities - listed</i>	
R0120	<i>Equities - unlisted</i>	
R0130	<i>Bonds</i>	101,802
R0140	<i>Government Bonds</i>	91,251
R0150	<i>Corporate Bonds</i>	10,551
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	0
R0180	<i>Collective Investments Undertakings</i>	5,976
R0190	<i>Derivatives</i>	
R0200	<i>Deposits other than cash equivalents</i>	0
R0210	<i>Other investments</i>	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	0
R0240	<i>Loans on policies</i>	0
R0250	<i>Loans and mortgages to individuals</i>	
R0260	<i>Other loans and mortgages</i>	
R0270	Reinsurance recoverables from:	220,640
R0280	<i>Non-life and health similar to non-life</i>	220,640
R0290	<i>Non-life excluding health</i>	220,640
R0300	<i>Health similar to non-life</i>	0
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	0
R0320	<i>Health similar to life</i>	
R0330	<i>Life excluding health and index-linked and unit-linked</i>	
R0340	<i>Life index-linked and unit-linked</i>	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	7,463
R0370	Reinsurance receivables	4,276
R0380	Receivables (trade, not insurance)	719
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	39,282
R0420	Any other assets, not elsewhere shown	216
R0500	Total assets	380,634

S.02.01.02

Balance sheet

		Solvency II value
		C0010
Liabilities		
R0510	Technical provisions - non-life	260,561
R0520	<i>Technical provisions - non-life (excluding health)</i>	260,561
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	255,627
R0550	<i>Risk margin</i>	4,934
R0560	<i>Technical provisions - health (similar to non-life)</i>	0
R0570	<i>TP calculated as a whole</i>	0
R0580	<i>Best Estimate</i>	0
R0590	<i>Risk margin</i>	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	<i>Technical provisions - health (similar to life)</i>	0
R0620	<i>TP calculated as a whole</i>	
R0630	<i>Best Estimate</i>	
R0640	<i>Risk margin</i>	
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	0
R0660	<i>TP calculated as a whole</i>	
R0670	<i>Best Estimate</i>	
R0680	<i>Risk margin</i>	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	<i>TP calculated as a whole</i>	
R0710	<i>Best Estimate</i>	
R0720	<i>Risk margin</i>	
R0740	Contingent liabilities	
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	
R0830	Reinsurance payables	41,111
R0840	Payables (trade, not insurance)	1,162
R0850	Subordinated liabilities	0
R0860	<i>Subordinated liabilities not in BOF</i>	
R0870	<i>Subordinated liabilities in BOF</i>	0
R0880	Any other liabilities, not elsewhere shown	2,320
R0900	Total liabilities	305,154
R1000	Excess of assets over liabilities	75,480

S.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020 Accident year / underwriting year

Gross Claims Paid (non-cumulative)														
(absolute amount)														
Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180	
	Development year										In Current year	Sum of years (cumulative)		
	0	1	2	3	4	5	6	7	8	9			10 & +	
R0100	Prior											6,241	6,241	6,241
R0160	2010	24,116	33,645	11,838	9,466	5,530	3,876	6,148	1,630	-1,122	191	191	95,318	
R0170	2011	22,690	32,882	17,512	10,072	5,998	6,250	8,291	1,594	598		598	105,887	
R0180	2012	18,958	40,351	17,158	12,694	10,116	7,269	823	3,766			3,766	111,136	
R0190	2013	22,635	26,222	10,957	6,368	4,936	2,334	3,179				3,179	76,630	
R0200	2014	16,536	24,793	21,011	11,019	7,782	2,896					2,896	84,037	
R0210	2015	17,857	35,321	17,289	9,102	7,866						7,866	87,434	
R0220	2016	13,700	40,994	14,077	13,555							13,555	82,326	
R0230	2017	16,271	31,194	16,170								16,170	63,635	
R0240	2018	21,433	35,626									35,626	57,058	
R0250	2019	20,270										20,270	20,270	
R0260												Total	110,358	789,973

Gross Undiscounted Best Estimate Claims Provisions													
(absolute amount)													
Year	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	
	Development year										10 & +	Year end (discounted data)	
	0	1	2	3	4	5	6	7	8	9			
R0100	Prior											6,468	6,324
R0160	2010	0	0	0	0	0	9,969	7,586	7,136	3,507		3,425	
R0170	2011	0	0	0	0	16,054	4,782	3,787	3,132			3,054	
R0180	2012	0	0	0	22,302	10,672	8,191	8,325				8,127	
R0190	2013	0	0	18,489	12,966	8,178	4,664					4,551	
R0200	2014	0	23,345	14,508	6,430	4,855						4,738	
R0210	2015	0	47,859	27,485	16,422	4,029						3,928	
R0220	2016	96,214	52,459	32,840	23,228							22,647	
R0230	2017	112,294	71,946	49,627								48,414	
R0240	2018	102,589	54,092									52,813	
R0250	2019	107,138										104,568	
R0260												Total	262,588

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
R0010 Market risk	7,772		
R0020 Counterparty default risk	16,936		
R0030 Life underwriting risk	0		
R0040 Health underwriting risk	0		
R0050 Non-life underwriting risk	18,062		
R0060 Diversification	-9,373		
R0070 Intangible asset risk	0		
R0100 Basic Solvency Capital Requirement	33,397		
Calculation of Solvency Capital Requirement			
R0130 Operational risk	7,669		
R0140 Loss-absorbing capacity of technical provisions	0		
R0150 Loss-absorbing capacity of deferred taxes	0		
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200 Solvency Capital Requirement excluding capital add-on	41,066		
R0210 Capital add-ons already set	0		
R0220 Solvency capital requirement	41,066		
Other information on SCR			
R0400 Capital requirement for duration-based equity risk sub-module	0		
R0410 Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420 Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430 Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440 Diversification effects due to RFF nSCR aggregation for article 304	0		
Approach to tax rate			
R0590 Approach based on average tax rate	0		
Calculation of loss absorbing capacity of deferred taxes			
LAC DT			
C0130			
R0640 LAC DT	0		
R0650 LAC DT justified by reversion of deferred tax liabilities	0		
R0660 LAC DT justified by reference to probable future taxable economic profit	0		
R0670 LAC DT justified by carry back, current year	0		
R0680 LAC DT justified by carry back, future years	0		
R0690 Maximum LAC DT	0		

USP Key

For life underwriting risk:

- 1 - Increase in the amount of annuity benefits
- 9 - None

For health underwriting risk:

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

For non-life underwriting risk:

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

