FIDELIS UNDERWRITING LIMITED

Solvency and Financial Condition Report

For the year 1 January 2021 to 31 December 2021

CONTENTS

I. EXECUTIVE SUMMARY

Fidelis Underwriting Limited ("FUL" or "the Company") presents its Solvency and Financial Condition Report ("SFCR") for the year ended 31 December 2021. The SFCR covers the Company's business and performance, system of governance, risk profile, valuation for solvency purposes, and capital management. The report details FUL's risk profile and its solvency and capital needs and examines how the Company's governance framework and risk management processes support it in identifying, monitoring, and assessing these needs.

A copy of this report is available on the Company's website: http://www.fidelisinsurance.com/investors/reports.

The administrative body that has ultimate responsibility for all these matters is the Company's Board of Directors, with the assistance of various governance and control functions which are in place to monitor and manage the business.

Throughout this document we have used acronyms and defined these in the glossary, please refer to page 74.

BUSINESS AND PERFORMANCE

FUL is a 100% directly owned subsidiary of Fidelis Insurance Holdings Limited ("FIHL") and is part of the Fidelis Group ("the Group"), which also comprises Fidelis Insurance Bermuda Limited ("FIBL"), Fidelis European Holdings Limited ("FEHL"), Fidelis Insurance Ireland Designated Activity Company ("FIID") and Fidelis Marketing Limited ("FML"). FUL is regulated by the PRA and the FCA.

The business written by the Company across eight Solvency II lines of business is a mix of bespoke, specialty and property classes of general insurance and reinsurance business written directly or through MGA.

As part of the Group's strategy to sponsor bespoke underwriting products, FIHL has established seven MGAs all managed by FIHL's MGA incubator, Pine Walk Capital Limited ("Pine Walk").

MGA	Coverage
Pine Walk Europe SRL	Provides surety, upstream energy, product recall and marine coverage
Radius Specialty Limited	Provides bespoke coverage in specialist reinsurance lines
Oakside Surety Limited	Focuses on small and medium-sized enterprises within the surety market
Kersey Specialty Limited	Focuses on upstream energy physical damage coverage
Perigon Product Recall Limited	Focuses on product recall and product contamination coverage
Navium Marine Limited	Focuses on insurance across the full range of marine classes
OPEnergy Limited	Focuses on onshore and offshore energy liability, providing public, products and pollution liability

The Company has an ongoing intra-group reinsurance agreement, with an overall 50% cession, with the Group's Bermuda carrier, FIBL, to maintain its risk profile in line with FUL's approved risk appetite.

FUL's gross premiums written for the year ended 31 December 2021 were $1,323.8 million (2020: $723.1 million) with a combined ratio of 79.5% (2020: 87.6%) and a net loss ratio of 45.2% (2020: 43.7%). The increase in gross premiums written was facilitated by an increase in capital and favourable pricing. The growth was mainly driven by increased volumes in marine, property direct and facultative and property reinsurance business. The Company experienced catastrophe losses during the year including in relation to

Hurricane Ida and US Winter Storm Uri. These results are testament to FUL's disciplined underwriting approach, coupled with its strong partnerships.

The net underwriting contribution under UK GAAP for 2021 compared to 2020 is shown below:

	2021	2020
$ millions		
Gross premiums written	1,323.8	723.1
Net premiums written	462.0	245.9
Net premiums earned	313.9	169.0
Net claims incurred	(142.0)	(73.9)
Net acquisition expenses	(51.0)	(25.9)
Net underwriting contribution	**120.9**	**69.3**
Net loss ratio	45.2%	43.7%
Net acquisition cost ratio	16.2%	15.3%
Combined ratio	79.5%	87.6%

The directors consider that the principal activity of FUL will continue unchanged into the foreseeable future.

SYSTEM OF GOVERNANCE

The Fidelis Group has implemented a simple yet effective system of corporate governance in a way which ensures that enterprise risk management is maintained at a high standard and that the business is operating in an efficient and effective manner. The FUL Board aligns its system of corporate governance with that of the Group where appropriate.

FUL is governed by its Board of Directors and two sub-committees of the Board: the Audit Committee and the Risk and Capital Committee. The FUL Board is ultimately responsible for ensuring that the principles of good governance are observed.

FUL has an Internal Control and Risk Management Framework and employs the "Three Lines of Defence" model to manage risk. The integration of the risk management process, business strategy, business planning, and capital management is defined through FUL's approach to its ORSA. Both the management team and the Board are fully engaged with the ORSA process and use it as a tool to help deepen their understanding of the business, better understand the risks and opportunities facing it and to refine and focus FUL's strategic thinking and priorities.

RISK PROFILE

The Company is exposed to risks from several sources. These include non-life underwriting risk, market risk, counterparty default risk, liquidity risk, operational risk, strategic risk and emerging risk. The primary risk to the Company is underwriting risk. There were no material changes to the Company's key risk areas in 2021. Each of these risk areas is described in more detail in section C.

The level of FUL's capital is adequate for its risk profile under both normal and stressed conditions and as evidenced by the stress and scenario testing under the Company's ORSA, FUL has sufficient capital to withstand a 1-in-200-year aggregate loss event.

The COVID-19 crisis continues to impact businesses since the World Health Organisation declared the disease to be a global pandemic in March 2020. Areas that have a potential to be impacted include valuation of the Company's investment portfolio and net reserves for losses and loss expenses. The potential for losses arising from COVID-19 have been and will continue to be monitored and discussed by management, and are currently immaterial.

On February 24, 2022, the Russian Federation invaded Ukraine resulting in armed conflict in Ukraine and the Black Sea (“Ukraine Conflict”). Subsequently a number of countries, including the United States of America, the United Kingdom, and those in the European Union, placed significant sanctions on Russian institutions and persons which resulted in a devaluation of the Rouble and a fall in the value of Russian fixed income and equity assets, and the prompt withdrawal of companies from Russia without securing their assets. Fidelis has minimal direct exposure to Russian equities and minimal exposure to fixed income assets impacted by sanctions. Fidelis has potential exposure to losses associated with the conflict in Ukraine and the Black Sea through certain lines in the Bespoke and Specialty segments. As a recent subsequent event, and in the light of the fluid nature of the Ukraine Conflict, there are a number of complexities and implications that will need to be evaluated and determined on an ongoing basis before Fidelis can reasonably estimate potential losses which could potentially be material. However, Fidelis does not believe the impact of the Ukraine Conflict will adversely affect the Company’s ability to operate as a going concern.

VALUATION FOR SOLVENCY PURPOSES

The assets and liabilities in the Solvency II balance sheet have been valued using Solvency II valuation rules. Solvency II valuation rules are different, in some areas, than those used in the Company's UK GAAP financial statements, with the valuation of TPs being the major area of difference. See section D for more detail on the valuation methods, bases and assumptions of assets and liabilities in the Solvency II balance sheet as well as a comparison to UK GAAP.

CAPITAL MANAGEMENT

FUL’s capital management objective is to ensure that the Company maintains, at all times, an appropriate level of capital, in terms of both quantity and quality in line with its risk appetite and capital requirements, and that it fulfils its obligations to measure, monitor, manage and report its capital position, both required and available, internally and externally as required, in accordance with relevant regulatory requirements.

The following table shows the difference between equity as shown in the financial statements and the Solvency II excess of assets over liabilities:

$ millions	**2021**	**2020**
Total UK GAAP equity	686.8	561.1
Ancillary own funds	50.0	—
Valuation adjustments relating to TPs	12.3	28.7
Deferred tax effect	(2.4)	(5.6)
Total basic own funds	**746.8**	**584.2**

The table below shows the SCR, MCR and Solvency II own funds and SCR coverage ratio of Solvency II eligible own funds to SCR were as follows as at 31 December 2021:

$ millions	**2021**	**2020**
SCR	500.3	384.3
MCR	125.1	96.1
Solvency II eligible Own Funds	746.8	584.2
SCR Coverage ratio	149.3 %	152.0 %

FUL has an unconditional guarantee from FIHL for all of its financial obligations.

During 2021 the Company received capital contributions of $75.0 million in March 2021 from FIHL for the issue of one share (2020: $245.0 million, four shares) to support business growth. Additionally, in December

2021 the PRA granted approval to the Company for $50 million of AOF that is reflected in regulatory capital, to support expected growth.

II. DIRECTORS' STATEMENT

Approval by the Board of Directors of the SFCR for the year ended 31 December 2021.

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

2) We are satisfied that:

   (a) throughout the financial year in question, the insurer has complied in all material respects with the requirements of the PRA rules and Solvency II Regulations as applicable to the insurer; and

   (b) it is reasonable to believe that, at the date of the publication of the SFCR, the insurer has continued so to comply, and will continue so to comply in future.

G Dawe

Director

Date: 7 April 2022

III. INDEPENDENT AUDITOR'S REPORT

Report of the external independent auditor to the Directors of Fidelis Underwriting 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

Except as stated below, we have audited the following documents prepared by the Company as at 31 December 2021:

- The ‘Valuation for Solvency Purposes’ and ‘Capital Management’ sections of the SFCR and Financial Condition Report of Fidelis Underwriting Limited as at 31 December 2021, (‘the Narrative Disclosures subject to audit’); and

- Company templates S02.01.02, S17.01.02, S23.01.01, S25.01.21, S28.01.01 ("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 ‘Business and performance’, ‘System of governance’ and ‘Risk profile’ sections of the Solvency and Financial Condition Report;
- Company templates S05.01.02, S05.02.01, S19.01.21;
- Information calculated in accordance with the previous regime used in the calculation of the transitional measure on technical provisions, and as a consequence all information relating to the transitional measures on technical provisions as set out in the Appendix to this report;
- the written acknowledgement by the Directors of their responsibilities, including for the preparation of the Solvency and Financial Condition Report (‘the Responsibility Statement’).

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

In our opinion, the information subject to audit in the Relevant Elements of the Solvency and Financial Condition Report of the Company as at 31 December 2021 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals and determinations.

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 Auditor’s Responsibilities for the Audit of the Relevant Elements of the Solvency and Financial Condition Report section of our report. We are independent of Fidelis Underwriting Limited in accordance with the ethical requirements that are relevant to our audit of the Solvency and Financial Condition Report in the UK, including the FRC 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.

Emphasis of Matter – special purpose basis of accounting

We draw attention to the 'Valuation for solvency purposes' and/or '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.

Going concern

The Directors have prepared the Solvency and Financial Condition Report on the going concern basis as they do not intend to liquidate the Company or to cease its operations, and as they have concluded that the Company's financial position means that this is realistic. They have also concluded that there are no material uncertainties that could have cast significant doubt over its ability to continue as a going concern for at least a year from the date of approval of the Solvency and Financial Condition Report ("the going concern period").

We used our knowledge of the Company, its industry, and the general economic environment to identify the inherent risks to its business model and analysed how those risks might affect the Company's financial resources or ability to continue operations over the going concern period. The risk that we considered most likely to adversely affect the Company's available financial resources over this period was the valuation of claims reserves (gross and net IBNR) given the estimation and judgement involved in setting these reserves.

We also considered less predictable but realistic second order impacts that could affect demand in the Company's markets, such as the failure of counterparties who transact with the Company (such as policyholders and reinsurers), the performance of the investment portfolio, solvency and capital adequacy.

We considered whether these risks could plausibly affect the liquidity and solvency in the going concern period by comparing severe, but plausible downside scenarios and the degree of downside assumptions that, individually and collectively, could result in a liquidity and solvency issue (a reverse stress test), taking into account the Company's current and projected financial resources.

Our conclusions based on this work:

• we consider that the directors' use of the going concern basis of accounting in the preparation of the Solvency and Financial Condition Report is appropriate; and

• we have not identified, and concur with the directors' assessment that there is not, a material uncertainty related to events or conditions that, individually or collectively, may cast significant doubt on the company's ability to continue as a going concern for the going concern period.

However, as we cannot predict all future events or conditions and as subsequent events may result in outcomes that are inconsistent with judgements that were reasonable at the time they were made, the above conclusions are not a guarantee that the Company will continue in operation.

Fraud and breaches of laws and regulations – ability to detect

To identify risks of material misstatement due to fraud ("fraud risks") we assessed events or conditions that could indicate an incentive or pressure to commit fraud or provide an opportunity to commit fraud. Our risk assessment procedures included:

- Enquiring of directors and the Audit Committee as to the Group's high- level policies and procedures to prevent and detect fraud, including the internal audit function, as well as whether they have knowledge of any actual, suspected or alleged fraud.

- Reading Board, Audit committee, Reserving Committee and Risk and Capital Committee meeting minutes.

- Using analytical procedures to identify any usual or unexpected relationships. We communicated identified fraud risks throughout the audit team and remained alert to any indications of fraud throughout the audit.

As required by auditing standards, we perform procedures to address the risk of management override of controls, in particular the risk that management may be in a position to make inappropriate accounting entries. On this audit we do not believe there is a fraud risk related to revenue recognition because the Solvency and Financial Condition Report is a balance sheet driven report.

We also identified a fraud risk in relation to the valuation of technical provisions (gross and net IBNR) due to the estimation required in setting these liabilities and the ability for changes in the valuation to be used to impact solvency ratios.

In determining the audit procedures we took into account the results of our evaluation and testing of the operating effectiveness of some of the fraud risk management controls. In order to address the risk of fraud specifically as it relates to the valuation of technical provisions (gross and net IBNR), we involved actuarial specialists to assist in our challenge of management. We challenged management in relation to the selection of assumptions and the consistency of those assumptions both year on year and across different aspects of the financial reporting process.

To address the pervasive risk as it related to management override, we performed procedures including:

- Identifying journal entries and other adjustments to test based on risk criteria and comparing the identified entries to supporting documentation. These included those posted by senior finance management or individuals who do not frequently post journals, those posted with descriptions containing key words or phrases, those posted to unusual accounts including those related to cash and post-closing journals meeting certain criteria.

- Assessing significant accounting estimates for bias.

Identifying and responding to risks of material misstatement due to non- compliance with laws and regulations

We identified areas of laws and regulations that could reasonably be expected to have a material effect on the Solvency and Financial Condition Report from our general commercial and sector experience, and through discussion with the directors and other management (as required by auditing standards), and from inspection of the Company's regulatory correspondence and discussed with the directors and other management the policies and procedures regarding compliance with laws and regulations.

As the Company is regulated, our assessment of risks involved gaining an understanding of the control environment including the entity's procedures for complying with regulatory requirements.

We communicated identified laws and regulations throughout our team and remained alert to any indications of non-compliance throughout the audit.

The potential effect of these laws and regulations on the Solvency and Financial Condition Report varies considerably.

Firstly, the Company is subject to laws and regulations that directly affect the Solvency and Financial Condition Report including financial reporting legislation (including related companies legislation), distributable profits legislation and taxation legislation and we assessed the extent of compliance with these laws and regulations as part of our procedures on the related financial statement items.

Secondly, the Company is subject to many other laws and regulations where the consequences of non-compliance could have a material effect on amounts or disclosures in the Solvency and Financial Condition Report, for instance through the imposition of fines or litigation or the loss of the Company's license to operate. We identified the following areas as those most likely to have such an effect: health and safety, anti-bribery, employment law, regulatory capital and liquidity and certain aspects of company legislation recognising the financial and regulated nature of the Company's activities and its legal form. Auditing standards limit the required audit procedures to identify non- compliance with these laws and regulations to enquiry of the directors and other management and inspection of regulatory and legal correspondence, if any. Therefore if a breach of operational regulations is not disclosed to us or evident from relevant correspondence, an audit will not detect that breach.

Context of the ability of the audit to detect fraud or breaches of law or regulation

Owing to the inherent limitations of an audit, there is an unavoidable risk that we may not have detected some material misstatements in the Solvency and Financial Condition Report, even though we have properly planned and performed our audit in accordance with auditing standards. For example, the further removed non-compliance with laws and regulations is from the events and transactions reflected in the Solvency and Financial Condition Report, the less likely the inherently limited procedures required by auditing standards would identify it.

In addition, as with any audit, there remained a higher risk of non-detection of fraud, as these may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal controls. Our audit procedures are designed to detect material misstatement. We are not responsible for preventing non-compliance or fraud and cannot be expected to detect non- compliance with all laws and regulations.

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, accordingly, 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; assessing the company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and using the going concern basis of accounting unless they either intend to liquidate the company or to cease operations, or have no realistic alternative but to do so.

Auditor's Responsibilities for the Audit of the Relevant Elements of the Solvency and Financial Condition Report

It is our responsibility to form an independent opinion as to whether the Relevant Elements of the Solvency and Financial Condition Report are prepared, in all material respects, with financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals and determinations.

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

A fuller description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities.

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 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.

The purpose of our audit work and to whom we owe our responsibilities

This report of the external auditor is made solely to the company's directors, as its governing body, in accordance with the requirement in Rule 4.1 (2) of the External Audit Part of the PRA Rulebook for Solvency II firms and the terms of our engagement. We acknowledge that the directors are required to submit the report to the PRA, to enable the PRA to verify that an auditor's report has been commissioned by the company's directors and issued in accordance with the requirement set out in Rule 4.1 (2) of the External Audit Part of the PRA Rulebook for Solvency II firms and to facilitate the discharge by the PRA of its regulatory functions in respect of the company, conferred on the PRA by or under the Financial Services and Markets Act 2000.

Our audit has been undertaken so that we might state to the company's directors those matters we are required to state to them in an auditor's report issued pursuant to Rule 4.1 (2) and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the company through its governing body, for our audit, for this report, or for the opinions we have formed.

Timothy Butchart
for and on behalf of KPMG LLP
Chartered Accountants
15 Canada Square
London
E14 5GL
7 April 2022

Appendix – relevant elements of the Solvency and Financial Condition Report that are not subject to audit
Solo standard formula

The Relevant Elements of the Solvency and Financial Condition Report that are not subject to audit comprise:

- The following elements of template S.12.01.02
  - Rows R0110 to R0130 – Amount of transitional measure on technical provisions

- The following elements of template S.17.01.02
  - Rows R0290 to R0310 – Amount of transitional measure on technical provisions

- The following elements of template S.22.01.21
  - Column C0030 – Impact of transitional measure on technical provisions

- Elements of the Narrative Disclosures subject to audit identified as 'unaudited'.

A. BUSINESS AND PERFORMANCE (UNAUDITED)

A1. BUSINESS

A1.1 Information regarding the business of the Company

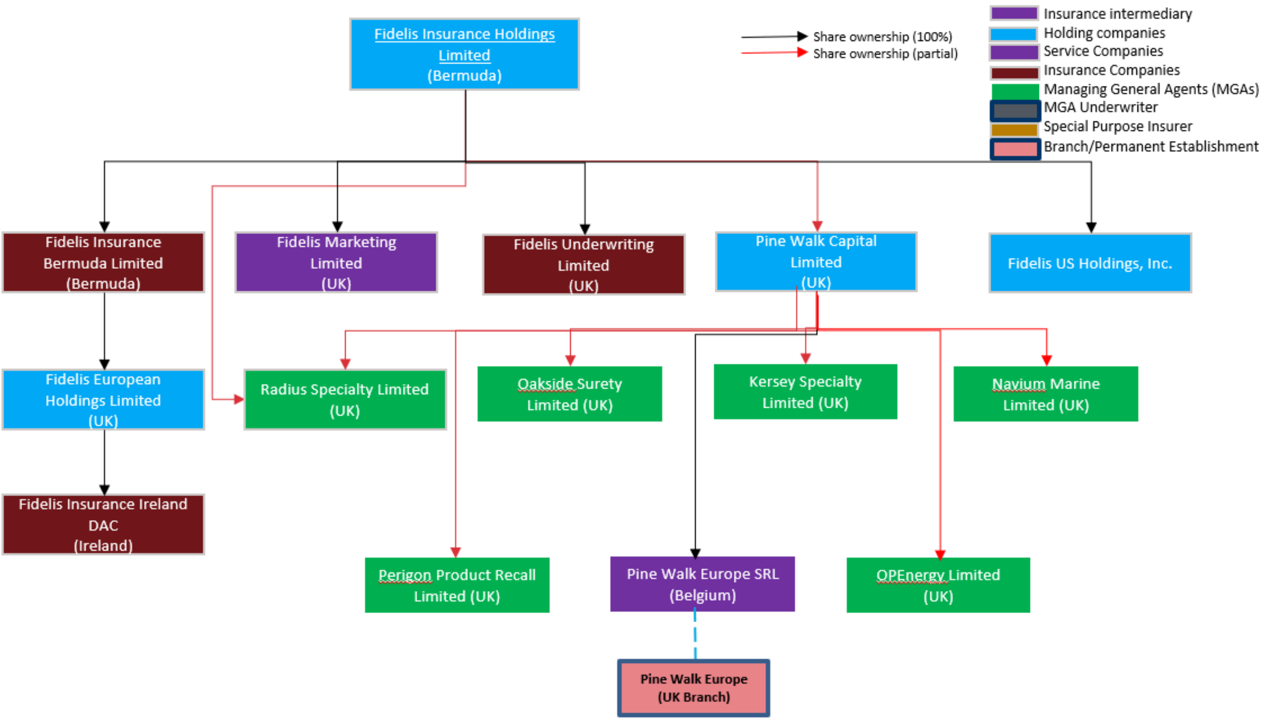
As set out in the Executive Summary above, FUL is a 100% directly owned subsidiary of FIHL and is part of the Group, which also comprises FIBL, FEHL, FIID and FML.

The Group also comprises Pine Walk, Pine Walk Europe SRL, Radius, Oakside, Kersey, Perigon, Navium and OPEnergy. Radius, Oakside, Kersey, Perigon, Navium and OPEnergy act as MGAs for business which is written in FUL.

FUL is regulated by the PRA and the FCA. The Company was licensed in the United Kingdom by the PRA on 4 December 2015 and commenced (re)insurance operations on 1 January 2016.

Registered office:	The Leadenhall Building 43rd Floor 122 Leadenhall Street London EC3V 4AB
Supervisory authorities:	Prudential Regulatory Authority 20 Moorgate London EC3R 6DA
	Financial Conduct Authority 25 The North Colonnade London E14 5HS
External Auditors:	KPMG LLP 15 Canada Square London E14 5GL

The following diagram provides details of the Group structure as at 31 December 2021:



A2. UNDERWRITING PERFORMANCE

A2.1 Overview of underwriting performance

The Company currently writes eight Solvency II lines of business: marine, aviation and transport insurance, fire and other damage to property insurance, general liability, credit and suretyship insurance, miscellaneous financial loss, non-proportional casualty reinsurance, non-proportional marine, aviation and transport reinsurance and non-proportional property reinsurance.

A2.2 Underwriting performance by Solvency II line of business (UK GAAP) for the year ended 31 December 2021

$ millions	Direct and accepted proportional business					Accepted non-proportional business			
	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Miscellaneous financial loss	Casualty	Marine, aviation, and transport	Property	Total
Gross premiums written	273.2	514.4	146.5	72.9	108.8	33.6	9.5	165.0	1,323.9
Net premiums written	99.7	155.6	71.2	39.0	47.1	18.7	1.8	29.1	462.2
Net premiums earned	59.4	131.7	34.8	21.3	19.0	5.1	14.4	28.3	314.0
Net claims incurred	(26.4)	(73.3)	(9.5)	(1.5)	(5.4)	(3.0)	(2.4)	(20.6)	(142.1)
Net acquisition expenses	(8.5)	(12.8)	(11.6)	(4.4)	(10.4)	(0.5)	(0.5)	(2.4)	(51.1)
Net underwriting contribution	24.5	45.6	13.7	15.4	3.3	1.6	11.5	5.3	120.9
Net loss ratio	44.4 %	55.7 %	27.3 %	7.0 %	28.4 %	58.8 %	16.7 %	72.8 %	45.3 %
Net acquisition cost ratio	14.3 %	9.7 %	33.3 %	20.7 %	54.7 %	9.8 %	3.5 %	8.5 %	16.3 %

Gross premiums written were $1,323.9 million in 2021 (2020: $723.1 million) as FUL utilised its increased capital base and capitalised on the significant hardening within the specialty markets. The improved rating environment, alongside a bigger balance sheet, allowed FUL to write additional volumes across marine, aviation and transport, and fire and other damage to property; notably through continued growth in property direct and facultative class and marine class, through Navium.
Premiums in general liability insurance, credit and suretyship insurance and to a lesser extent casualty, grew from 2020 where reduced appetite on credit exposed business suppressed volumes. These classes have seen rating improvement and FUL, with a strengthened balance sheet, pursued these in 2021.
Property Reinsurance volumes were above prior year, leveraging rate increases and balance sheet size. Additionally, premium volumes were positively impacted by reinstatement of cover on loss affected deals.

Net premiums written were $462.0 million in 2021 (2020: $245.9 million). Additional outwards reinsurance placements to support growth alongside gross volumes ceding to existing quota shares maintained the effective net cession year on year. Net premiums earned for the year were $314.0 million (2020: $169.0 million) driven by higher gross volumes in the year, alongside growth in the prior year earning through.

Net claims incurred in 2021 were $142.1 million (2020: $74.0 million). The net loss ratio for 2021 was 45.3% (2020: 43.7%). Losses were driven by notable catastrophe events including Hurricane Ida, Winter Storm Uri and South African Riots.

Net acquisition expenses were $51.1 million (2020: $25.8 million) and the ratio of net acquisition expenses to net premiums earned was 16.3% (2020: 15.3%). The increase in the ratio being due to changes in the mix of business written towards lines with higher average commission rates.

The commentary below, by significant Solvency II line of business, incorporates values reported in the S.05.01 QRT (which is included in appendix B). The Company's underwriting performance by geographical area is detailed in the S.05.02.01 QRT (appendix B). All business is underwritten in the United Kingdom and risks covered are worldwide.

During 2021 we undertook an exercise to review all lines of business and where appropriate change the Solvency II line of business to which they were allocated. This "re-classification" exercise has been applied to both the current and comparative periods.

Previously reported results have been included for reference but all commentary has been made against the 2020 reclassified. The main drivers of the movements in the reparameterisation are:

- Onshore energy business being reclassified to the "fire and other damage to property" line of business from the "marine, aviation and transport" line of business based on the underlying nature of the contracts relating to onshore exposures.

- Representations and warranties insurance policies being reclassified to the "general liability" line of business from the "miscellaneous financial loss" line of business based on the underlying nature of the contracts relating to a legal liability.

Marine, aviation and transport

	2021	2020 reclassified	2020 reported
$ millions			
Gross premiums written	273.2	122.8	183.2
Net premiums written	99.7	40.7	52.8
Net premiums earned	59.4	21.4	27.0
Net claims incurred	(26.4)	(14.1)	(15.5)
Net acquisition expenses	(8.5)	(1.7)	(0.9)
Net underwriting contribution	24.5	5.6	10.6
Net loss ratio	44.4%	65.9%	57.4%
Net acquisition cost ratio	14.3%	7.9%	3.5%

Marine, aviation, and transport includes the Company's marine and aviation and aerospace lines.

Gross premiums written increased year on year, driven predominantly by marine ($103.7 million) and to a lesser extent aviation and aerospace ($46.7 million). In marine, a new Pine Walk marine MGA, Navium, was established in 2021 to write a diverse mix of existing and emerging marine risks. In aviation, strong growth in aviation more than offset lower than prior year aerospace business. Additionally, in the prior year aviation hull income was coded to non-proportional marine, aviation and transport, resulting in a lower written comparative.

Additional outwards reinsurance protects the newly written business, managing FUL's net exposure to the marine risks. Premiums earned, net of outwards reinsurance protections, are above prior year as continued growth in this class earns through from both prior year and current year volumes.

The net loss ratio in the class decreased in line with improved claims experience in the current year as the growth in aviation business earns out.

Net acquisition expenses were above prior year due to business mix within the class.

Fire and other damage to property

$ millions	2021	2020 reclassified	2020 reported
Gross premiums written	514.4	279.6	215.2
Net premiums written	155.6	93.3	83.1
Net premiums earned	131.7	36.7	31.0
Net losses	(73.3)	(7.9)	(7.0)
Net acquisition expenses	(12.8)	(2.7)	(3.3)
Net underwriting contribution	45.6	26.1	20.7
Net loss ratio	55.7%	21.5%	22.6%
Net acquisition cost ratio	9.7%	7.4%	10.6%

Fire and other damage to property predominantly comprises the Company's direct and facultative, energy, quota share property catastrophe and political violence business.

Gross premiums written continue to grow significantly within this class, driven predominantly by the continued dislocation in the direct and facultative market. The improved rating environment alongside planned growth in the class, resulted in significant year on year growth of $189.2 million.

Gross volumes within the energy construction and energy property lines are down on prior year yet are more than replaced by new opportunities within renewable energy.

Additionally, the Company took advantage of new opportunities within quota share property catastrophe ($30.2 million) and political violence ($10.0 million) to further increase its share in this class.
The significant growth within direct and facultative has been protected by additional non-proportional reinsurance covers. On the property catastrophe book additional gross volumes were ceded to quota share partners.

Net premiums earned are $95.0 million above the prior year due to the earn out of prior year direct and facultative business, where a significant proportion of business was written in the second half of 2020 and a greater proportion of earnings were recognised in 2021.

Losses within the class were impacted by catastrophe events in 2021. These include, but are not limited to, Hurricane Ida and Winter Storm Uri.

General liability

$ millions	2021	2020 reclassified	2020 reported
Gross premiums written	146.5	69.0	23.5
Net premiums written	71.2	43.0	17.3
Net premiums earned	34.8	18.1	10.3
Net claims incurred	(9.5)	(7.7)	(5.7)
Net acquisition expenses	(11.6)	(4.9)	(3.0)
Net underwriting contribution	13.7	5.5	1.6
Net loss ratio	27.3%	42.5%	55.1%
Net acquisition cost ratio	33.3%	27.1%	28.9%

General Liability predominantly consists of the Company's warranty, product recall, energy liability, cyber and professional Indemnity and general liability business.

The significant increase in gross premiums written is driven by warranty where current year volumes are above prior year coupled with premium written on facilities incepting in 2020 attaching in 2021 ($72.2 million).

In product recall, the Pine Walk MGA, Perigon, established in 2020, took advantage of continued market dislocation writing higher volumes of business in 2021 ($10.2 million). In energy, a new Pine Walk energy liability MGA, OPEnergy was established in 2021 writing both onshore and offshore risks ($15.0 million).

Lastly, in cyber, FUL ended a significant binding agreement in 2021, this deficit was partially offset by higher volumes within the Pine Walk MGA, Radius ($15.0 million).

Net premiums are above the prior year due to the growth in gross premium written net of additional outwards cover purchased for existing and new business.

Net losses in the prior year were negatively impacted by attritional claims experience and reserves held for a cyber breach loss. The Company had no large loss deterioration in the year and no additional large losses, resulting in a reduction in the loss ratio.

The increase in the net acquisition cost ratio of 37.1% (2020: 26.9%) is due to additional outwards reinsurance reducing net earned premiums, the denominator of the ratio.

Credit and suretyship

$ millions	2021	2020 reclassified	2020 reported
Gross premiums written	72.9	27.8	24.2
Net premiums written	39.0	9.4	7.4
Net premiums earned	21.3	25.3	8.7
Net claims incurred	(1.5)	(3.0)	(0.2)
Net acquisition expenses	(4.4)	(3.4)	(1.4)
Net underwriting contribution	15.4	18.9	7.1
Net loss ratio	7.0%	11.9%	1.9%
Net acquisition cost ratio	20.7%	13.4%	15.7%

Credit and suretyship include the Company's bespoke, political risk, contract frustration, mortgage and other credit business.

Gross premiums written have increased predominantly due to renewed appetite in the company's bespoke business, where prior year volumes were suppressed by $44.4 million due to reduced credit exposed appetite in light of the economic environment arising from COVID-19.

Net premiums are above the prior year due to the growth in gross premium written net of additional outwards cover purchased for existing and new business.

Net premiums earned were below the prior year due to the prior period benefiting from higher gross volumes in 2019 earning through into 2020. Additionally, premium growth in 2020 and 2021 has a longer average earning pattern.

The increase in the net acquisition cost ratio to 20.6% (2020: 15.7%) is due to the impact of additional outwards reinsurance purchases on net premiums earned alongside business mix.

Miscellaneous financial loss

$ millions	2021	2020 reclassified	2020 reported
Gross premiums written	108.8	38.6	91.7
Net premiums written	47.1	14.8	40.7
Net premiums earned	19.0	15.9	40.5
Net claims incurred	(5.4)	(3.5)	(7.9)
Net acquisition expenses	(10.4)	(6.9)	(11.1)
Net underwriting contribution	3.3	5.5	21.6
Net loss ratio	28.4%	22.0%	19.4%
Net acquisition cost ratio	54.7%	43.4%	27.4%

This class consists primarily of the Company's title and contingency business.

Gross premiums written are $70.2 million above the prior year, predominantly driven by volumes in the Company's title business ($72.5 million), where the post pandemic market saw increased opportunities. Additionally, dislocation in the contingency markets has resulted in growth opportunities ($17.6 million), which more than offset reductions in other bespoke lines of business.

Net premiums earned are $3.1 million above prior year, but to a lesser extent than gross premiums written due to title business, the main line of business in this class, having a longer average earning pattern.

The loss ratio is higher than the prior period due to reserve releases in the prior year following favourable claims experience favourably impacting the loss ratio in the prior year.

The net acquisition cost ratio has increased due to mix of business.

Non-proportional reinsurance – marine, aviation and transport

$ millions	2021	2020 reclassified	2020 reported
Gross premiums written	9.5	52.8	57.0
Net premiums written	1.8	19.7	21.3
Net premiums earned	14.4	5.6	6.7
Net claims incurred	(2.4)	(0.8)	(0.8)
Net acquisition expenses	(0.5)	(0.4)	(0.5)
Net underwriting contribution	11.5	4.4	5.5
Net loss ratio	16.7%	14.3%	11.5%
Net acquisition cost ratio	3.5%	7.1%	7.0%

Non-proportional reinsurance – marine, aviation and transport predominantly include the Company's non-proportional marine and aviation business.

Gross and net premiums written decreased as in the prior year aviation hull business was coded to non-proportional reinsurance – marine, aviation and transport, this business is now written in marine, aviation and transport ($39.6 million).

Net earned premiums are above prior year due to the earn out of prior year aviation reinsurance hull business in the current year. Aviation hull business is now written in marine, aviation and transport.

Non-proportional reinsurance - property

$ millions	2021	2020 reclassified	2020 reported
Gross premiums written	165.0	122.2	119.8
Net premiums written	29.1	21.2	20.2
Net premiums earned	28.3	39.7	38.7
Net claims incurred	(20.6)	(33.7)	(33.8)
Net acquisition expenses	(2.4)	(3.7)	(3.7)
Net underwriting contribution	5.3	2.3	1.2
Net loss ratio	72.8%	84.9%	87.4%
Net acquisition cost ratio	8.5%	9.3%	9.5%

Non-proportional reinsurance - property predominantly includes FUL's property catastrophe reinsurance business.

Gross premiums written increased year on year ($33.7 million) as FUL leveraged rate increases, and an improved capital position, to write additional North American catastrophe and aggregate excess of loss covers alongside participating in new quota share arrangements. Additionally, reinstatements in respect of loss impacted coverage contributed to the increase in gross premiums written.

Net earned premium volumes are $11.4 million below prior year due to a higher proportion of multi-year outwards protections written in the current year.

The net loss ratio is below prior year, with notable catastrophe events impacting FUL in both years.

Non-proportional reinsurance – casualty

	2021	2020 reclassified	2020 reported
$ millions			
Gross premiums written	33.6	10.3	8.5
Net premiums written	18.7	4.0	3.3
Net premiums earned	5.1	6.4	6.2
Net claims incurred	(3.0)	(3.2)	(3.1)
Net acquisition expenses	(0.5)	(2.1)	(2.1)
Net underwriting contribution	1.6	1.1	1.0
Net loss ratio	58.8%	50.0%	50.0%
Net acquisition cost ratio	9.8%	32.8%	33.5%

Non-proportional reinsurance – casualty includes FUL's non-proportional cyber, mortgage and accident and health treaty business.

Gross premiums written are above the prior year driven by increased volumes in mortgage, where the comparative year contained premium adjustments in relation to 2019. Additionally, gross written premiums in Radius MGA cyber lines were above prior year because of an improved rating environment strengthening premium incomes.

Net premiums earned were below the prior year, due to higher prior underwriting year volumes earning through in the comparative year, predominantly in mortgage.

The net acquisition cost ratio has decreased due to writing more business on lines with lower average commission rates, partially offset by the impact of additional outwards reinsurance purchases impacting net earned premiums.

A3. INVESTMENT PERFORMANCE

A3.1 Income and expenses from investments by asset class

The following table presents the components of investment return by asset class during the year-ended 31 December 2021:

$ millions	Investment income	Net realised losses	Change in net unrealised losses	Investment loss
Government bonds	3.4	(0.8)	(3.3)	(0.8)
Corporate bonds	11.5	(0.9)	(13.9)	(3.2)
Collateralised securities	1.6	(2.0)	(0.6)	(1.0)
Derivatives	—	—	(0.1)	(0.1)
Cash and other	—	—	—	—
Investment fees	—	—	—	(1.1)
Investment return	16.5	(3.7)	(17.9)	(6.2)

The following table presents the components of investment return by asset class during the year-ended 31 December 2020:

$ millions	Investment income	Net realised gains / (losses)	Change in net unrealised gains	Investment return
Government bonds	1.7	0.3	1.1	3.1
Corporate bonds	5.8	0.4	1.6	7.8
Collateralised securities	0.7	(0.5)	0.4	0.6
Derivatives	-	1.4	-	1.4
Cash and other	0.5	-	-	0.5
Investment fees	-	-	-	(0.5)
Investment return	8.7	1.6	3.1	12.9

The lower return in 2021 vs the prior year is due to the significant upward shift in the yield curve driving unrealised investment losses as the economy rebounded, inflationary pressures started to build and as markets started to anticipate central bank monetary tightening actions.

A3.2 Gains and losses recognised directly in equity

The Company accounts for all investments at fair value with gains and losses through the income statement. During the year, all gains or losses were recognised in the income statement and no gains or losses were recognised directly in equity.

A3.3 Collateralised securities

The following table presents the components of collateralised securities' investment return by asset type during the year-ended 31 December 2021:

$ millions	Investment Income	Net realised losses	Change in net unrealised losses	Total
Mortgage-backed securities	1.6	(2.0)	(0.6)	(1.0)
Investment return	1.6	(2.0)	(0.6)	(1.0)

The following table presents the components of collateralised securities' investment return by asset type during the year-ended 31 December 2020:

$ millions	Investment Income	Net realised losses	Change in net unrealised gains	Total
Mortgage-backed securities	0.7	(0.5)	0.4	0.6
Investment return	0.7	(0.5)	0.4	0.6

FUL holds a low proportion of its fixed income portfolio in collateralised securities (mortgage-backed securities, and collateralised mortgage obligations) to improve the diversification of the portfolio. Investment limits have been placed on these assets through an advisory agreement with its portfolio manager and FUL maintains a strict review of securities held to ensure the guidelines agreed between the portfolio manager and FUL are followed and that any securities held comply with Solvency II requirements.

A4. PERFORMANCE OF OTHER ACTIVITIES

Other material expenses comprise the following:

$ millions	2021	2020
Employment costs	30.1	35.2
Non-employment costs	15.8	6.1
IT costs	6.7	4.2
Professional and consulting fees	3.8	2.8
Investment expenses	1.1	0.5
Total investment and administrative expenses	**57.5**	**48.8**

The Company does not have any direct employees. All of the UK based staff are employed by FML. Employment costs have decreased during the year due to a decrease in variable compensation, due to the performance of the Group being below target. Administrative expenses for FUL are predominantly a result of a recharge from other Group companies for providing physical infrastructure, staff and associated support services.

A5. OTHER INFORMATION REGARDING THE BUSINESS

FUL has a commitment to its communities, which we recognise includes environmental responsibilities. In line with our Group Carbon Positivity Policy, we measure our carbon emissions and purchased 200% of our 2020 carbon emissions in equivalent carbon credits. Through the development of best practices in our business, the Company aims to use no more consumables than are necessary and recycle the maximum of those we do use. The Company also believes that embedding environmental awareness throughout the organisation will be best achieved through a continuous programme of employee engagement.

Historically, the Group has been a net carbon positive firm. Other commitments that have been made publicly are detailed on the Group's internet site: https://www.fidelisinsurance.com/corporate-responsibility/Our-Commitments. The ESG working group is determining what climate related strategy/ targets FUL should be working towards. As a part of this process the ESG working group is also estimating the potential impact on the business that it writes and the assets that it invests in. The Company is aware of climate laws and regulations including those that are expected to be enacted in the future for the jurisdictions in which the Company operates as that could affect its assets and operations. The Company achieves this through monitoring legal developments and maintaining a log of relevant regulatory developments.

FUL takes account of environmental, social and governance issues in its underwriting. We avoid direct involvement in the extraction and use of coal in generating energy. In political risk underwriting, we require and review social, economic and environmental impact studies for infrastructure projects. For the 2022 business plan FUL has made some explicit allowances to increase loss ratios to account for increases in natural catastrophe losses due to the impact of climate change. The Group has also run the PRA's 2019 biennial climate change scenario against its underwriting and investment portfolios. Based on the 2022 viewpoint, the impacts on the Group are not currently considered to be material. We consider animal welfare as a top priority and seek to avoid risks associated with intensive farming, abattoirs and seek to avoid direct involvement in activities such as animal testing except in the development of medicines. The Company has promoted the use of a Forced Labour clause in marine cargo in the London market in cooperation with Anti Slavery International and The UK Independent Anti Slavery Commissioner.

Further details regarding the Group's commitments to its communities can be found here:

https://www.fidelisinsurance.com/corporate-responsibility/Our-Commitments

Fidelis established its charitable body, The Fidelis Foundation, in December 2020. Further details regarding The Fidelis Foundation's commitments, including a list of charities supported in 2021 can be found here: https://www.fidelisinsurance.com/corporate-responsibility/the-fidelis-foundation.

Governance

FUL and the Fidelis Group have established a governance framework in respect of managing the risks related to climate change. This governance framework includes:

- A cross-departmental Climate Change Committee has been established. This committee is responsible for identifying the climate related financial risks material to the business over the short, medium and long term and to escalate material risks to the RRC with recommendations on potential mitigating actions to take.
- A summary of the work undertaken in respect of climate change is included in the CRO report to the FUL Risk and Capital Committee which is a FUL Board committee.
- The Legal and Compliance department monitor for emerging regulatory requirements related to climate change and communicate these to the relevant areas of the function as appropriate.
- In line with PRA requirements the FUL CRO has been appointed as the SMF responsible for the financial risks for climate change.

Underwriting

Fidelis takes a 4-pronged approach to pricing and managing climate change risk:

- Risk selection - Fidelis limits exposure to writing high frequency perils through a preference to write high layers on programs, along with well-priced lower layers and reducing exposure in middle layers which are more exposed to increased frequency and severity of losses as a result of climate change and secondary perils associated with floods and wildfires without the commensurate increase in rates
- Vendor models - Fidelis uses the most up to date catastrophe models
- Prudent model adjustments - Fidelis loads modelling data prudently to reflect exposure at risk for its view of climate change
- Reality check - Fidelis does not blindly rely on model pricing, weighting to experience when most appropriate

As a result of this approach additional climate change loadings have been added to business plan loss ratios and also to pricing loss ratios for elemental exposed risks.

Investments

The Fidelis Group has established a set of ESG guidelines and restrictions for its investment portfolio.

In respect of the investment portfolio FUL applies restrictions in investments to align to our views. In this regard we have limitations on investments related to Coal, Oil and Gas, Weapons, For Profit Prisons and Animal Welfare while also holding an allocation to Green, Social and Sustainable Bonds.

Operations

FUL does not have any physical assets that may be directly exposed to climate-related events or changes.

Stress and Scenario Testing

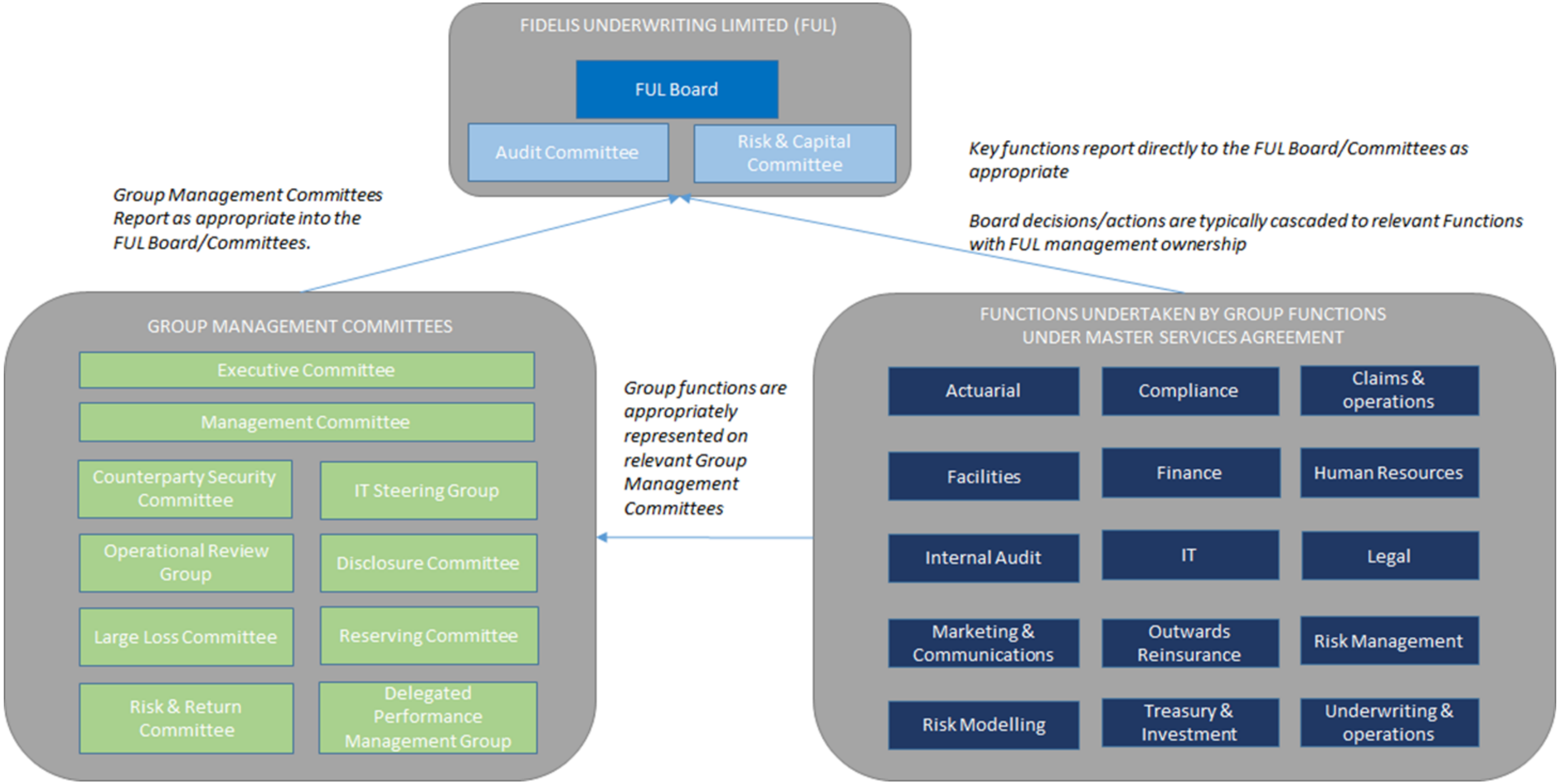
Climate change related scenario testing is run over short, medium and long-term horizons on both the underwriting and investment portfolios as a part of the ORSA process.

B. SYSTEM OF GOVERNANCE (UNAUDITED)

B1. GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE

B1.1 Role and responsibilities of the administrative, management or supervisory body and key functions

The diagram below presents an overview of FUL's governance structures:



The table below summarises the role of each of the Boards and entity committees that make up FUL's System of Governance as at 31 December 2021:

Board / Committee	INEDS	Exec	Role	Links into boards
Board	3 (inc. Chair)	2	Considering and deciding on FUL's strategy and matters affecting FUL, including matters referred for approval by FIHL committees, FUL committees or Group management committees	Considers, challenges and is the sole point of FUL approval. Matters cascaded from the FIHL Board may be approved, approved with subjectivities, amended or rejected by the FUL Board or referred back to the FIHL Board.
Audit Committee	3	—	Independent review and challenge of financial and regulatory reporting and the internal control environment, oversight of the internal audit function and external auditors	The Committee Chair reports into the FUL Board on the outcome of the audit committee. The Group General Counsel ensures any matters referred by the FIHL Board are also reported to the FUL Board.
Risk & Capital Committee	3	3	To advise the FUL Board in respect of risk and capital management and oversight of risk management and tolerances	The Committee Chair reports into the FUL Board. The Group CRO ensures any matters referred by the FIHL Board are also reported to the FUL Board.

In addition, the table below summarises the role of the Group management committees, their role and how they interact with other parts of the system of governance as at 31 December 2021:

Management Committee	Role	Links into Boards/Entity Committees
Executive Committee	Review the Group's strategy, operations and business plan, assess and action any opportunities that are in the best interest of the Fidelis Group and make proposals to the FIHL Board and FIHL Committees relating to the strategy, operations and conduct of the business of the Fidelis Group and ensure the operations of the Group are within the strategy and business plans approved by the FIHL Board	Matters requiring Board consideration or approval are referred to the FUL Board by the FUL CEO
Management Committee	Co-ordinate and execute the implementation of the strategy and business plan as decided by Group and subsidiary Boards and the Executive Committee; report on and refer to the Executive Committee all items requiring strategic oversight or opinion	Matters requiring Board consideration or approval are referred to the FUL Board by the FUL CEO
Risk & Return Committee	Oversight of risk appetite, tolerances and preferences, risk methodology, capital and solvency appetite, capital methodology, risk return optimisation and risk and capital monitoring	Matters requiring FUL Board consideration or approval are referred by the FUL CRO to the FUL Risk & Capital Committee
Counterparty Security Committee	Oversee development and adherence to outwards reinsurer and broker counterparty exposure tolerances	Matters requiring FUL Board consideration or approval are referred by the FUL CFO or FUL CEO to the FUL Board
IT Steering Group	A forum to consider the Technology Strategy of the Group and to approve and track the progress and performance of IT projects and change requests	Matters requiring FUL Board consideration or approval are referred by the FUL CEO to the FUL Board
Operational Review Group	Challenges, approves or declines New Business Initiatives and Delegated Underwriting/Claims Authorities from an operational viewpoint, after in principle underwriting approval has been received	Matters requiring FUL Board consideration or approval are referred by the FUL CFO or the Group Head of Compliance s to the FUL Board
Delegated Performance Management Committee	Ongoing monitoring of performance and management of conduct risk concerning delegated authorities, as per the Group Delegated Authority Procedure and the Group Conduct Risk Framework	Matters requiring FUL Board consideration or approval are referred by the FUL CUO to the FUL Board
Disclosure Committee	Review disclosures around Fidelis' financial condition and results of operations, ad hoc disclosures such as press releases and conference presentations and oversee the design and effectiveness of the Group's disclosure controls	While the Disclosure Committee will not review all regulatory filings, it will review material regulatory filings which will be made available in the public domain. The Disclosure Committee will review such disclosures and recommend their inclusion in the FUL Board materials for consideration and approval. The FUL CFO will bring the filing to the FUL Board in the relevant Board papers for review and approval.
Large Loss Committee	Monitors the developments in relation to large or complex insurance/ reinsurance claims and sets case specific loss reserves exceeding the authorities of the Group Head of Claims	Matters requiring FUL Board consideration or approval are referred by the Group Chief Actuary (as appropriate) to the FUL Board
Reserving Committee	Considers and opines on portfolio level reserves and IBNR for recommendation to the relevant Boards	Matters requiring FUL Board consideration or approval are referred by the Group Chief Actuary to the FUL Board in quarterly Board reporting

The Company shares key control functions with the Group, namely the Group Head of Compliance, the Group HIA and the Group Actuary, who each report into the FUL Board and/or Committees as appropriate. The internal outsource of the Group-wide functions ensures appropriate seniority of the holders of the key control functions. When engaged on behalf of FUL, these individuals report to FUL's Board. The independence of the key control function holders is assured through independence in reporting lines. All key control function holders report into either Group level senior management or, in the case of the Group HIA, to the Chair of the Audit Committee who is an INED.

B1.2 Material changes in the system of governance over the reporting period

There have been no material changes to the system of governance over the reporting period.

B1.3 Remuneration policy for the administrative, management or supervisory body and employees

B1.3.1 Principles of the remuneration policy

The Compensation Framework is recommended for approval by the Group Compensation Committee to the FIHL Board. After approval by the FIHL Board the relevant details are reported to the subsidiary boards including FUL's Board. The FUL Board does not deem it necessary to establish a separate FUL Compensation committee and believes it appropriate that such matters, on the basis of the proportionate size and risk profile of the Company, be addressed by the Board.

The Company's remuneration approach reflects the intent to align shareholder and employee interests by attracting and retaining employees of the highest calibre and motivating them to drive the Company's business plan and build shareholder value. Fixed compensation is based on market norms for the position, and total compensation aims to provide above market level compensation for superior performance. Variable compensation programs are provided to all employees and include a company wide bonus plan and a RSU plan.

INEDs receive a quarterly directors' fee. They are not eligible for additional non-cash benefits or variable compensation.

In addition to the above, certain senior staff are required to commit, by way of an annual declaration, that they have not and will not enter into any personal hedging strategies in relation to their variable remuneration or to otherwise undermine their risk alignment with FUL/the Fidelis Group in their variable remuneration.

B1.3.2 Information on individual and collective performance criteria on which variable components of remuneration is based

The bonus plan performance criteria are comprised of both personal performance and company performance and the bonus is paid annually. Personal performance is evaluated based on achievement of specific objectives and demonstration of cultural values and management responsibilities (where applicable). Company performance is measured against a pre-established target for the annual ROE for the Group. The RSUs contain both service and performance conditions. For the majority of employees, two-thirds of the RSU grants vest based on service after a three-year period and one-third of the RSUs vest based on certain performance conditions based on achievement of pre-established targets for the three-year average ROE for the Group and underwriting profit relative to an agreed peer group. For the Executive Committee and for the Group CEO the RSU's are more heavily weighted towards performance conditions to increase alignment with shareholder interests.

B1.3.3 Supplementary pension or early retirement schemes for the members of the administrative, management or supervisory body and other key function holders

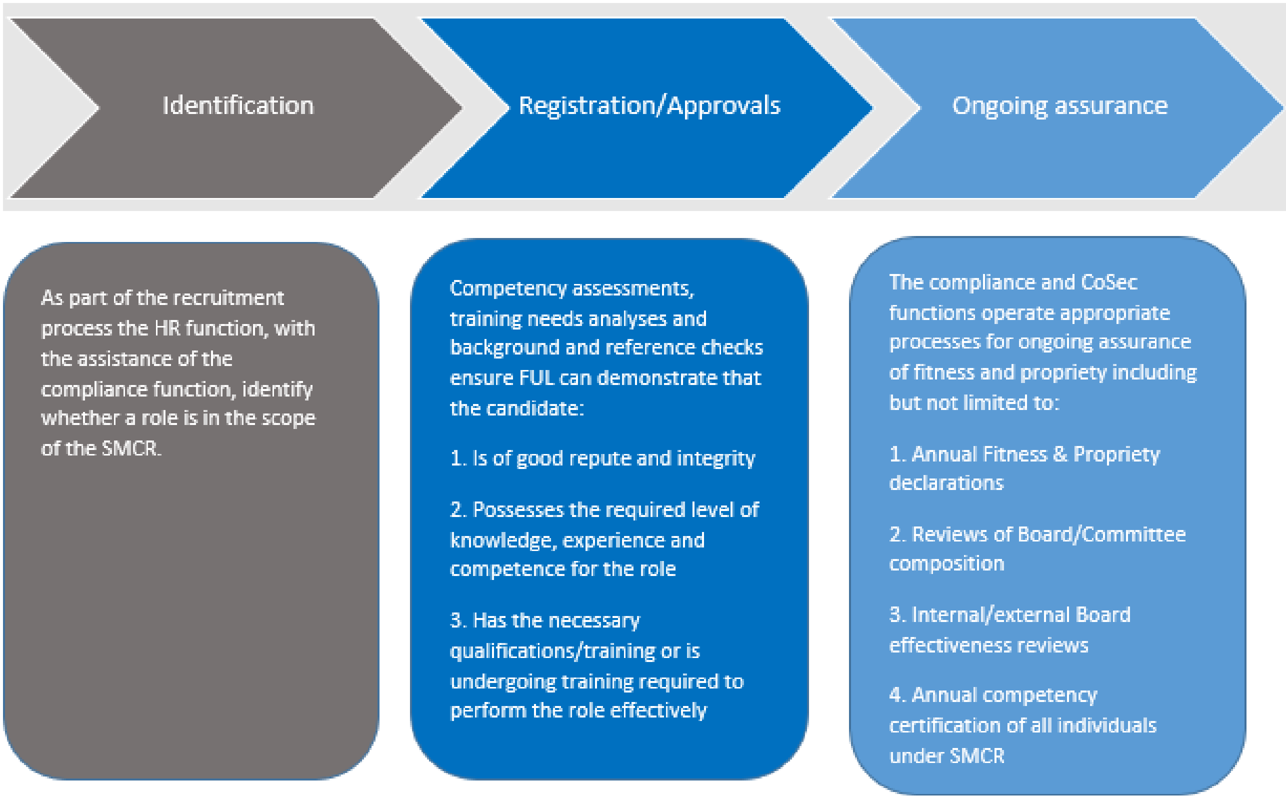
The Company's remuneration policy does not include any supplementary pension or early retirement schemes for members of the Board or other key function holders. The Company offers all staff the choice of making contributions into a defined contribution pension scheme, subject to applicable pension rules. Where employer pension contributions may exceed the annual allowance cap, the company offers all employees the option of an equivalent salary supplement (payable less employer NI).

B1.4 Material transactions with the shareholder, with persons who exercise a significant influence on the undertaking, and with members of the administrative, management or supervisory body

During 2021 the Company received a capital contribution of $75.0 million in March 2021 from FIHL for the issue of one share (2020: $245.0 million, four shares). Additionally, in December 2021 the PRA granted approval to the Company for $50 million of AOF that is reflected in regulatory capital, to support expected growth.

B2. FIT AND PROPER REQUIREMENTS

FUL operates within a Group Regulated Personnel Procedure which governs the recruitment, appointment, approvals, induction, training and ongoing assessment of the Fitness and Propriety of those who effectively run FUL.



As per the SMCR requirements, individuals who are performing either an SMF, a Certification role or are notified non-executive Directors are required to be assessed for their fitness and propriety at appointment and on an on-going basis by FUL.

Assessing a person's fitness and propriety includes an assessment of their:

- honesty, integrity and reputation;
- competence and capability, including whether the person satisfies any relevant FCA training and competence requirements; and
- His/her financial soundness.

The FUL Board identifies the skills and experience that are required at Board level, including the appointment of executive directors or independent non-executive directors, so as to ensure the relevant diversity, experience, skills and knowledge required for effective oversight and challenge.

Fitness and propriety assessment on appointment

A fit and proper assessment on appointment is undertaken for all candidates being hired to SMF roles. The fit and proper assessment is completed prior to the individual commencing their duties as a regulated individual. The fit and proper assessment made at initial appointment will normally include (but may not be limited to):

- Interview with appropriately qualified manager(s) and relevant senior experienced individuals
- Collection of satisfactory references from previous employers for the previous six years.
- Background checks, verifying key information provided including:

a. Criminal disclosure

b. CV

c. Education and qualifications

d. Directorship search

e. FCA register search

f. and other legal, regulatory, and financial checks as appropriate.

In addition, members of the FUL Board complete an annual evaluation of board effectiveness.

Annual fitness and propriety assessment

For all individuals who are certificated staff or SMF holders an annual fit and proper assessment will be undertaken. This assessment includes, but is not limited to:

- The completion of annual Director and Officers questionnaire (incorporating an fit and proper questionnaire);
- Annual performance review by an appropriately qualified line manager
- Annual Board effectiveness review

B3. RISK MANAGEMENT SYSTEM INCLUDING THE OWN RISK AND SOLVENCY ASSESSMENT

B3.1 Risk management system

FUL operates the Group Risk, Capital and Solvency Management Framework (“the Framework”) leveraging Group capabilities and governance structures whilst maintaining full local accountability with the FUL Board.

The approved risk management framework is designed to identify, measure, manage and report on the exposures that FUL faces.

1) Identification – the risk exposures that could materially impact FUL in achieving its objectives are identified through the quarterly risk review process with each of the risk owners and the emerging risk process.

2) Measurement – these risks are quantified and ranked in the operational risk register in terms of the impact that they would have on FUL if the risk were to materialise. With respect to the aggregation of the underwriting exposures, these are monitored on at least a quarterly basis to ensure that they remain within the FUL Board’s approved risk appetite levels.

3) Management - where a risk exposure has exceeded the FUL Board's risk appetite or the risk levels are more generally considered to be higher than desirable, management identifies suitable actions to either transfer, avoid or mitigate the risk level.

4) Reporting – a summary of all key material risk exposures is reported to the FUL Board on a quarterly basis. Where there has been an exceedance in the FUL Board's risk appetite, the report details management's plans to transfer, avoid or mitigate the risk, where appropriate.

The Framework is founded upon a clear understanding and articulation of the risk universe to which FUL is, or could be, exposed. This universe encompasses those intrinsic risks that are fundamental to FUL's business (such as underwriting and market risk), operational risks (that may crystallise either independently of, or be correlated with intrinsic risk) and those more subjective yet nevertheless important sources of risk such as emerging risk.

The classification of subcategories of risk into those "core" risks that are actively pursued to optimise FUL's risk adjusted return, and those "non-core" risks that are a necessary consequence of the business but have little or no potential to generate a reward, is reflected throughout the framework.

For each category of risk, the FUL Board has an established risk appetite comprising qualitative statements supported by specific tolerances (expressed in quantitative terms where appropriate) against which risk exposures are monitored and managed. This appetite is adjusted over the business cycle in response to market conditions and the strategic and tactical drivers over the horizon of the business plan.

Monitoring and reporting of the risk, capital and solvency position is performed on both an actual and, where meaningful, prospective basis with a frequency that is proportionate to the materiality and volatility of risk presented by each category of risk defined in the universe, and reported quarterly as part of the CRO report.

FUL has embedded the principles of effective risk management and the ORSA in its core business processes - the forward-looking assessment of risk, capital and solvency adequacy being integrated into the strategic decision making and continuous monitoring processes.

The significant quantifiable risks that FUL faces are set out below:

Risk Category	Risk Description
Non-life underwriting risk	This risk arises from two sources – adverse claims development (reserve risk) and underwriting (premium risk)
Market risk	The risk that the value of the Company's assets falls or that there are adverse currency swings
Counterparty default risk	The risk of default of one of FUL's reinsurers or intermediaries
Operational risk	The risk of losses resulting from inadequate or failed people, processes, systems or from external events

Each of these risks has been captured in the overall solvency needs of FUL through the calculation of the SCR using the Solvency II Standard Formula, the setting and monitoring of risk appetite tolerances for each of the risks, and consideration of how the risk exposures are likely to change over the planning period in both normal and stressed environments.

Other than liquidity risk, which is not explicitly captured by the standard formula SCR, there are no identified quantifiable material risks faced by FUL that are not currently considered to be included in the SCR as calculated by the Standard Formula. The details as to how the Company monitors and mitigates against liquidity risk are detailed in section C1.4.

i. Governance and structure

The FUL Board retains sole authority for setting the risk and capital appetite for the Company within the context of the overall Group and taking into account any recommendations from FUL Board committees and management.

The Board receives comprehensive risk and capital reporting on at least a quarterly basis and at such other times as required due to an actual or projected change in the Company's risk, capital or solvency profile. The RCC, a committee of the Board, supports the Board in ensuring the continued effectiveness and appropriateness of the framework - reviewing, challenging and making recommendations upon its outputs.

The RCC and Board are supported by management's RRC in the day-to-day maintenance of the framework and its underlying components. It meets approximately every three weeks, which affords an appropriate level of review and challenge. A summary of the RRC work in the period and any issues and recommendations for Board attention are reported through the CRO report to the RCC.

The Board and committees are supported by the risk management, actuarial, compliance, legal and audit functions.

ii. Core processes

The risk, capital and solvency management framework is delivered through a series of business processes operated with a frequency designed to provide on-going management of the Company's changing risk profile, capital and solvency position on both a current and projected basis that is proportionate, whilst addressing stated regulatory reporting requirements.

The core elements of the process include:

- **Strategic Planning**

The annual strategic planning process provides projections based on a range of potential economic and market scenarios.

The review revisits and restates the Company's strategic risk and return aims to evaluate the prospective performance of the business model.

The strategy is reviewed annually, typically in the Board meeting in the second quarter of each year.

- **Business Planning**

The business planning process incorporates a forward-looking projection of the risk, capital and solvency profile of the Company and associated strategies.

It includes the assessment of a range of potential business scenarios supported by the use of stress testing, to test forecast capital adequacy, volatility and viability and inform capital and liquidity management strategies and associated contingency plans.

The proposed plan is subject to Board challenge and approval and formalises the risk / return objectives, risk and capital appetite, underwriting, and investment and capital management plans for the coming year against which performance is assessed.

The process involves extensive input from risk management, the actuarial function, and the RRC, with a key output being the CRO's review of the business plan covering a series of summary assertions relating to risk, capital and solvency matters noting any exceptions or recommending changes to the risk, capital and solvency appetite.

The plan is typically reviewed and approved by the Board in the fourth quarter and updated in the first quarter of the following year with the benefit of the year-end and key January renewals and forms the core of the annual ORSA process.

iii. Quarterly risk, capital and solvency review

The FUL CRO provides the RCC with a full review of the risks facing the Company at least quarterly and at any other time as required in the interim in response to a material actual or proposed change in its risk, capital and solvency profile.

The review provides a quantitative analysis of the risk, liquidity, capital and solvency profile of the Company against the Board approved risk appetites as well as considering a forward-looking view of the risks that it faces. It therefore addresses the core elements of the ORSA on a quarterly basis.

B3.2 Own risk and solvency assessment

The ORSA is the forward-looking process by which the Board can monitor the risks to the business and assess the impact of those risks on the capital adequacy of the business. The Board uses the ORSA to inform its future business decisions and to ensure that any risk remaining after controls have been applied is within the parameters of FUL's risk appetite.

The ORSA process is undertaken on a formal basis at least annually as a part of FUL's annual business planning process. A full or partial ad hoc ORSA process is undertaken if there has been a material change in FUL's risk profile.

Following the completion of each ORSA process, the results are documented and reported to the FUL Board for review and approval. In line with regulatory guidance, a supervisory report of the results of this assessment is then provided to the PRA within two weeks of the Board approval.

Through the performance of the ORSA process and based on the business strategy and plan, FUL determines its overall solvency needs by taking into account its current and projected risk profile, regulatory capital requirements, and risk appetite tolerance limits.

The results of the ORSA process are considered on an on-going basis in decision-making in respect of the Company's capital management activities and risk framework development.

The latest formal ORSA process was conducted as part of FUL's annual business planning process in the first quarter of 2022. It was approved by the FUL Board during Q1 2022 and subsequently submitted to the PRA within two weeks of the Board approval.

B4. INTERNAL CONTROL SYSTEM

B4.1 Description of internal control system

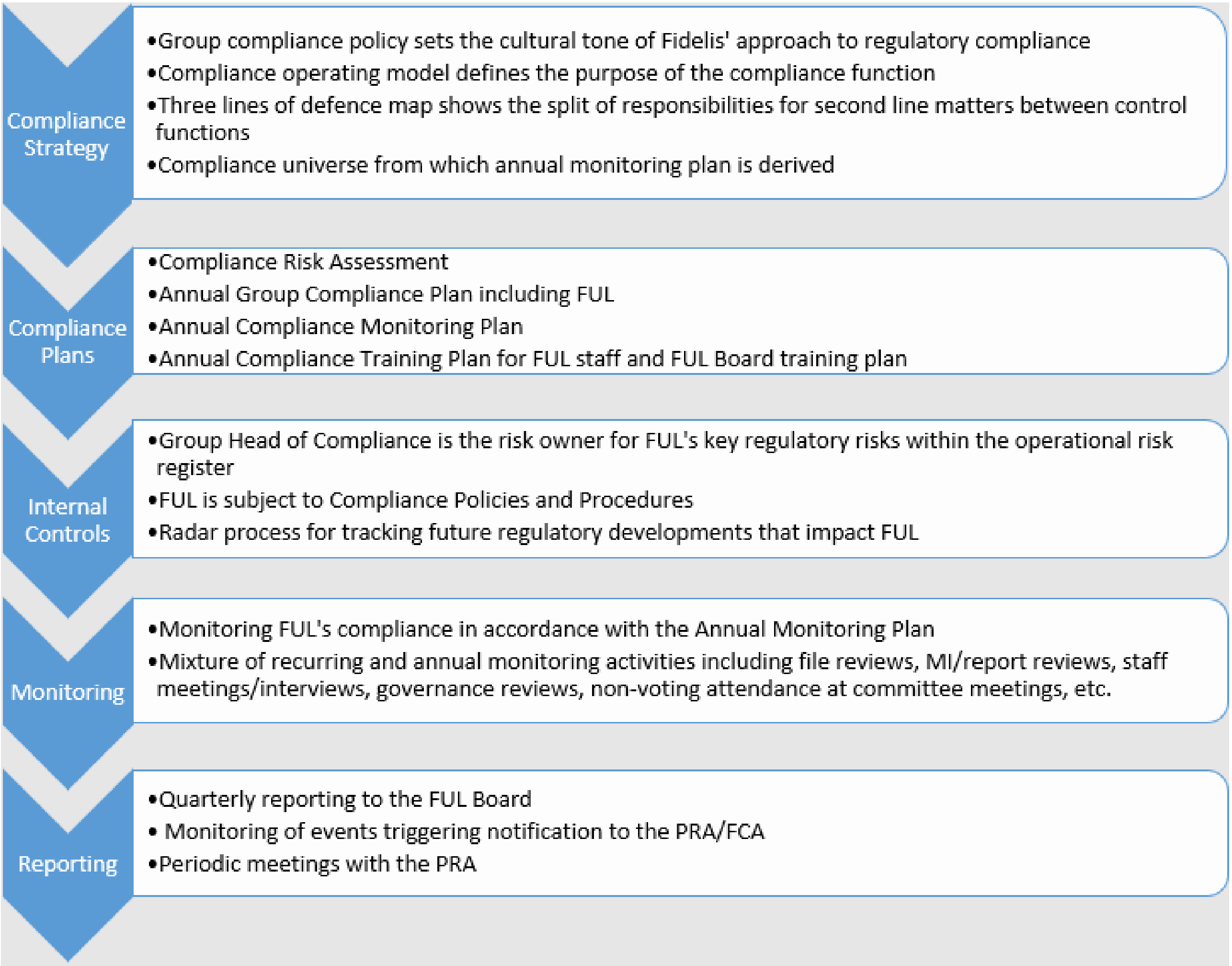
Significant internal policies are approved at Group level by the FIHL Board, with subsequent approval by the subsidiary boards who may either approve the policy, approve subject to amendments, or decline to approve the policy, with a resulting referral back to the FIHL Board for reconsideration. Group level policies provide a statement of intent, with internal procedures intended to embed and achieve the policy being driven, owned and approved by senior management.

Internal controls have been adopted in such a way as to ensure that they are aligned with each other and to the business strategy and are subject to a risk-based periodic review cycle. All key internal controls are recorded in the risks and controls register so as to be capable of second line monitoring and third line audits.

B4.2 Implementation of the compliance function

The Group compliance function is led by the Group Head of Compliance who reports into the Group General Counsel and Director of Strategic Execution. The Group Head of Compliance is responsible for FUL's Compliance oversight and the Head of UK Compliance is the Money Laundering Reporting Officer.

A summary of the compliance risk management framework is below:



The compliance function seeks to be a trusted advisor to the business, driving and supporting innovation whilst partnering with the business and regulators to ensure regulatory obligations are met. The compliance function seeks to ensure that FUL's culture and behaviours put clients' interests at the heart of its business activities and that FUL acts with integrity in the market.

B5. INTERNAL AUDIT FUNCTION

B5.1 Implementation of the internal audit function

The internal audit department is resourced both internally by the Group HIA and a number of internal audit staff across the three offices, and through a panel of co-source service providers. The Group HIA has drafted and the FUL Audit Committee has approved and recommended to the FUL Board:

- An audit charter;
- An audit universe;
- A budget for co-source resource;

- A rolling plan for testing of financial reporting controls; and
- An annual audit plan.

The Group HIA drafted and maintains the audit universe which is presented to the FUL Audit Committee annually as part of the audit plan approval process. The audit plan is risk-based and constructed using several inputs including the risk and controls register, discussion with management, discussion with the external auditor, KPMG, and input from the co-source providers. The overriding factor in deciding what is on the audit plan is the Group HIA's experience and opinion to ensure the audit plan is independent of management and management's view of risk. The audit plan is reviewed regularly, with any changes deemed necessary by the Group HIA approved by the FUL Audit Committee. The Group HIA, using in-house or co-source resource, as agreed by the FUL Audit Committee, will then execute the audit plan.

The internal audit department aims to comply with industry best practice wherever possible. This includes the principles set out by the IIA. In 2017 the IIA issued guidance for Effective Internal Audit in the financial services sector. A gap analysis is maintained to identify any areas of non-compliance.

There is a quarterly report issued to the FUL Audit Committee reporting on the activities of Internal Audit over the prior quarter, specifically:

- Progress of completion of the audit plan;
- Summary of audit work completed in the quarter including reports issued;
- Progress with the clearance of agreed actions;
- Overdue agreed actions;
- Proposed changes to the plan if necessary;
- Budget usage for co-source; and
- Any other matters.

The Group HIA, in conjunction with the business plan to be approved by the FUL Board each year, presents an annual audit plan, typically in the fourth quarter, for approval by the FUL Board.

B5.2 Independence and objectivity of internal audit

The following key procedures are in place to ensure that internal audit is independent and objective:

- Primary reporting line – The Group HIA has a direct reporting line to the Chair of the FUL Audit Committee;
- Secondary reporting line – The Group HIA's secondary reporting line on a day-to-day basis is to the Group Executive Director;
- Group HIA compensation – All compensation arrangements for the Group HIA are subject to Group Compensation Committee review and approval, removing any management influence over the Group HIA compensation;
- HIA Appraisal – this will be performed in the first instance by the Group CRO and is then reviewed and approved by the Chair of the Group Audit Committee;

- Audit Committee private session – the FUL Audit Committee, as per its quarterly standing agenda item, may request a closed session with the Group HIA at its regularly held meetings. Furthermore, it is compulsory at least annually for the Group HIA to have a closed session with the FUL Audit Committee. This ensures that the Group HIA can relay any serious concerns without management present;

- The HIA and Chair of the Audit Committee have a private meeting pre-Audit Committee every quarter to discuss all Audit Committee materials provided by the HIA. At this meeting the HIA has the opportunity to raise any concerns he may have;

- Agreement of audit reports – the Group HIA is responsible for agreeing and issuing all internal audit reports and being satisfied that any raised actions have been appropriately addressed and closed; and

- Internal audit policy – the approved policy provides for the audit team to have unfettered access to all staff, records and information of the Company as they see fit while conducting audits.

B6. ACTUARIAL FUNCTION

The actuarial function, led by the FUL Chief Actuary, consists of a number of qualified actuaries, analysts and catastrophe modellers. The function is also supported by an external consultancy, Dynamo Analytics, who provide actuarial support and peer review.

Key responsibilities include the valuation of the TPs, opining on the underwriting policy and reinsurance arrangements and calculating the standard formula SCR as well as assessing the appropriateness of the standard formula being used to calculate the SCR. The function is integral to building and maintaining pricing models, as well as carrying out case pricing and catastrophe and exposure modelling.

The work performed by the function and the resulting opinions, are documented at least annually in the actuarial function report. The function reports its activities and findings to the FUL Board.

It is the responsibility of the actuarial function to report on each of the above areas, and in addition to this, make recommendations to remediate any deficiencies identified.

The FUL Chief Actuary is responsible for ensuring that there is sufficient independence in the activities undertaken by the actuarial function. Independence is supported by the following factors:

- All actuaries within the function are members of actuarial associations and subject to both professional and technical requirements;

- An external reserve review is carried out at year end providing the Board with an alternative view;

- Key tasks of the function are subject to governance through the Audit Committee, RCC and/or the FUL Board. These committees include all non-executive directors ensuring familiarity and adequate challenge;

- All tasks of the function are subject to internal audit on a regular basis which aids identification and escalation of deficiencies; and

- The FUL Chief Actuary role is an approved position and is subject to the PRA/FCA SMCR.

B7. OUTSOURCING

FUL operates an outsourcing policy and outsourcing procedure (“outsourcing controls”). This applies to any form of agreement between FUL and an external third party, where the latter performs a (re)insurance activity or undertakes a key function on behalf of FUL, which FUL would otherwise perform itself. An outsourced service is regarded as critical or important if a defect or failure in its performance would have a material, negative impact on:

1. The quality and continuity of providing core services to the policyholders;
2. FUL’s continuing compliance with the conditions and obligations of its authorisation;
3. FUL’s ability to comply with other regulatory obligations.

The outsourcing controls require appropriate consideration of the operational, regulatory and other risks associated with the activities to be outsourced, both prior to signing the agreement and in monitoring after the agreement is signed.

Where there is critical or important outsourcing arrangement, the outsourcing controls require the following levels of additional scrutiny:

<u>Prior to executing the arrangement</u>

- Enhanced due diligence
- Minimum contractual requirements
- FUL Board approval of the outsourcing arrangement
- Parent Board approval if the outsourcing arrangement is critical for the Fidelis Group as a whole
- Notification to relevant regulators

<u>After executing the agreement</u>

- Frequent monitoring by the function owner of the outsourcing relationship
- Quarterly Board reporting by the compliance function.
- More stringent renewal requirements

FUL currently outsources the following critical functions listed below, noting the jurisdiction of the service providers:

Function	Location of outsourced service provider	Rationale for outsourcing	Function responsible for oversight
Investment Custodian / Administrator and Investment Accounting Services	United States of America	Administration of, and accounting for a portfolio of fixed-income securities is a technical job that requires significant investment in people and technology. At current size of assets, it would be not economical to do this in-house. Outsourcing enables FUL to have its portfolio independently priced and appropriately reported.	Finance
Data Storage	United Kingdom	The Fidelis IT strategy is to seek best available capability providers across as few external providers as possible. Outsourcing allows scalable data storage capabilities.	IT
Solvency II TPs and other Actuarial Support	United Kingdom	FUL would not currently be able to economically perform the level of actuarial and technical work required for calculating, evaluating and monitoring Solvency II TPs.	Actuarial
Underwriting Systems Support	United Kingdom	The Fidelis IT strategy is to seek best available capability providers across as few external providers as possible. The outsourcer's expertise is utilised for design and maintenance of underwriting system and a new claims and policy administration system.	IT
Claims Management Support	United Kingdom	The outsourcer provides key support for the Group's growth by supplying claims related service which would be beyond its internal capacity. These include monitoring claim alerts, assessing and actioning claim files.	Claims

In addition to the above, there is a master intra-group services agreement and a number of non-material outsourcing agreements in place.

B8. ASSESSMENT OF THE ADEQUACY OF THE SYSTEM OF GOVERNANCE

The system of governance and its effectiveness is subject to annual review by the compliance function, which reports to the Board. The Board considers FUL's system of governance to be effective and appropriate for the nature, complexity and scale of the risks inherent in the firm and its business.

B9. OTHER INFORMATION

The Group Head of Compliance performs annual reviews of compliance with the requirements in relation to the system of governance sections of this report. Appropriate action is taken to deal with any findings, changes or updates required.

C. RISK PROFILE (UNAUDITED)

C1. RISK CATEGORIES

C1.1 Non-life underwriting risk

i. Overview of assessment of non-life underwriting risk

Underwriting risk arises from the Company's general insurance business and refers to the risk of loss, or of adverse change in the value of insurance liabilities due to inadequate pricing and reserving assumptions.

Examples of such risks include unexpected losses arising from fluctuations in the timing, frequency and severity of claims compared to expectations and inadequate reinsurance protection. The Company's underwriting and reinsurance strategies are set within the context of the overall Fidelis strategies, approved by the Board and communicated clearly throughout the business through policy statements and guidelines. The underwriting strategy attempts to ensure that the underwritten risks are well diversified in terms of type and amount of risk, industry and geography.

ii. Risk mitigation techniques for non-life underwriting risk

Premium risk

Building on the foundation of strict underwriting and individual underwriter authorities, the Company operates a system of peer review to a high level of sophistication, depth and scope of application.

All new risks and renewals are required to be presented to the daily UMCC (or "the call(s)"), normally prior to terms being offered and in the event of a material change in terms, exposure or pricing from that agreed previously. The call is designed to ensure the cooperative and collegiate management of insurance risk, ensure that individual underwriters draw upon the expertise of their peers, and avoid silos of underwriting. Where delegated authorities, binders or lineslips are accepted, the master contract will be reviewed at the UMCC as well as by the Operational Review Group although declarations or risks attaching to such covers may not be.

In addition to underwriters, the calls are frequently attended by representatives from actuarial, exposure modelling, capital modelling, risk, claims, finance, legal and compliance functions to provide appropriate expertise and challenge. Regular attendance of the Group CRO and FUL CRO provides an additional layer of defence and supports them in keeping abreast of actual, projected and potential emerging risk issues in real time.

Product design and pricing aims to minimise adverse selection of risks and use appropriate rating factors to differentiate between levels of risk.

A key aspect of the Company's strategy for risk mitigation centres on the use of outwards reinsurance for the inwards portfolio. Outwards reinsurance allows FUL to more effectively manage capital, to reduce and spread the risk of loss on insurance and reinsurance business and to limit the Company's exposure to multiple claims arising from a single occurrence.

The FUL Board primarily approves the purchase of outwards reinsurance as a part of the approval of the business plan. The main reinsurance treaty for FUL is an IGR quota share treaty with FIBL. FUL also purchases additional facultative and treaty reinsurance protection as the FUL CUO deems necessary, on behalf of the Board. The Group also purchases proportional and non-proportional treaty placements, with the knowledge of the FUL CUO.

The Company plans to continue to use outwards reinsurance as one of its main underwriting risk mitigation technique over the business planning time horizon.

Reserving risk

As the majority of the Company's portfolio is expected to benefit from a short period of discovery of loss, the reserves will relate to claims notified against which the Company will hold individually evaluated case reserves and IBNR reserves. These reserves are expected to be less variable from a risk perspective than peers with longer tail business.

The Company aims to set reserves at a level that limits the potential impact of reserve deterioration on overall return on equity whilst avoiding the taxation, reputational and regulatory risks that could result from systematic or excessive over-reserving.

FUL's stated risk tolerance level is that it has no appetite for setting case reserves below the levels advised by internal or external claims adjusters and counsel, nor does it have appetite to set IBNR reserves below the mean best estimate determined in consultation between our internal and external actuaries.

In addition to the quarterly review cycle operated by the Fidelis actuarial function, the level of reserves across all classes are subject to a full external actuarial review annually.

The Company began making payments in 2021 to settle obligations with lending banks relating to the termination of lease arrangements, following missed financing payments. It is management's expectation that the Company will recover amounts paid via the sale or lease of repossessed property, and this has been recognised within subrogation recovery on paid claims. The recoverable amounts have been estimated by considering, amongst other evidence, a range of values provided by expert valuation consultancies. There is a risk that the final amounts realised for the subrogation assets materially differ from these estimates.

iii. Risk assessment of non-life underwriting risk

Premium risk

Elemental (e.g. wind, earthquake) and non-elemental (e.g. terror, aviation, marine, economic risks) exposures are monitored on a range of metrics set out in the Board approved risk appetite, based upon data from the in-house underwriting system combined with the use of external and proprietary modelling techniques.

For elemental exposures, modelling leverages the use of external stochastic catastrophe modelling tools operated in-house by the dedicated Fidelis modelling team. The results of the modelling are reviewed by the RRC and reported to senior management and the Board at least quarterly providing modelled OEP curves estimating the PML both gross and net of reinsurance for each significant peril / geographical zone at a range of return periods.

For non-elemental exposures, where stochastic modelling capabilities are not available, the process considers a range of RRC approved deterministic RDS designed to represent hypothetical extreme but nonetheless credible potential loss scenarios. These are supplemented by internally modelled loss distributions projecting potential losses at a range of return periods similar to the approach applied to elemental exposures. The deterministic RDS scenarios also includes those defined in the standard formula that materially influence the Company's SCR.

Reserving risk

In respect of reserve risk, in addition to the quarterly review cycle operated by the Fidelis actuarial function, the level of reserves across all classes is subject to a full external actuarial review annually.

iv. Risk concentration of non-life underwriting risk

Non-life underwriting risk concentrations may occur in relation to geographic regions, geographic locations, industry sectors, and insured counterparties. The potential for the build-up of concentration risk is monitored on a frequent basis against the Board's stated risk appetite for such concentrations.

C1.2 Market risk

i. Overview of assessment of market risk

The Company seeks to optimise its investment income whilst focusing on ensuring it maintains sufficient capital to meet solvency requirements and maintain sufficient liquid funds to meet liabilities when they fall due. Exposure to market risk is therefore limited to the extent that investment strategies are balanced by these primary objectives.

Market risk is divided into three subcategories: investment risk, currency risk, and asset and liability matching risk. We assess our risk asset exposures whenever there is volatility in the equity markets.

ii. Risk mitigation techniques for market risk

Investment risk

The key drivers of investment risk are a function of the fixed income strategy that the Company has chosen to follow. The primary drivers of risk in the fixed income portfolio are shifts in the yield curve (interest rate risk) and the credit quality of the investment (spread risk).

The investment portfolio performance and risk are managed at an aggregate portfolio level. The investment strategy and investment types have been chosen specifically to construct an investment portfolio that ensures the credit quality, duration, and value at risk remain within the risk tolerances set out in the risk appetite. The investment portfolio's key metrics are included in the quarterly CRO report to the FUL Board.

FUL contracts with its portfolio managers for the provision of investment management services. The Company's investment guidelines and risk, capital and solvency appetite formalise FUL's appetite for investment risk at the portfolio level.

Extensive due diligence of investments is undertaken prior to finalising these investment guidelines. This due diligence considers many aspects of the investment decision including the potential for adverse aggregations and correlations with other elements of the investment portfolio and the underwriting portfolio.

A strategic asset allocation exercise is undertaken regularly in conjunction with the investment managers which takes into account the Company's risk tolerance levels and investment objectives. Investment decisions are made in line with the Company's investment guidelines and the prudent person principle.

The high credit quality nature of the fixed income portfolio provides a level of mitigation against spread risk.

Currency risk

Currency risk exposures arise due to assets and liabilities being held in differing currencies. Whilst the Company accepts a degree of currency risk as a natural consequence of operating across multiple currencies, it has no desire for speculative exposure as a means to value creation.

The Group's risk appetite limits currency mismatches to $5.0 million equivalent per currency within 14 days of completion of the management accounts, recognising that doing so at individual operating entity may be disproportionate and in theory potentially trigger inefficient risk management action.

Recognising that the variability in individual currencies is something over which the Company has no control, it therefore seeks to limit its actual exposure to currency risk through asset liability matching including, and where appropriate, currency hedging strategies that are undertaken at the Group level taking into account FUL's own exposures.

An increase or decrease of 25% in the US dollar would result in additional loss or gain for the year of $2.9 million gross of tax (2020: $9.3 million) with an equal impact on net assets, assuming all other assumptions remain unchanged.

Asset and liability matching risk

Asset and liability matching risk is defined as the risk that the Company either does not have available sufficient financial resources to enable it to meet its medium to long term financial obligations due to for example, a currency or duration mismatch in its assets and liabilities.

These risks arise from open market positions in interest rate and currency products, both of which are exposed to general and specific market movements.

The Company's overall risk management programme focuses on the unpredictability of financial markets and seeks to minimise potential adverse effects on the Company's financial performance. It manages these positions within a risk management framework that incorporates a Board-approved risk appetite limit that defines the maximum currency and duration mismatches that are allowed, as well as the investment portfolio being developed to ensure that investment proceeds and returns and available cash are in excess of obligations under insurance contracts.

iii. Risk assessment of market risk

Investment Risk

The aggregate risk level is managed through the adherence to the investment guidelines with the portfolio managers. The investment portfolio is monitored and reviewed on an ongoing basis to ensure adherence to credit limit guidelines. In addition, there are limits on the amount of credit exposure to any one issuer, except for US government securities.

The investment portfolio is also monitored on a quarterly basis to ensure that the following risk metrics remain within the Board's stated risk appetite:

- The average portfolio duration;
- The average portfolio credit quality;
- The minimum credit quality at time of purchase; and
- Value-at-Risk

The Company monitors interest rate risk on at least a quarterly basis by calculating the duration of the investment portfolio. Duration is an indicator of the sensitivity of the assets to changes in current interest rates.

Investment risk is also assessed as a part of the stress and scenario testing undertaken as a part of the ORSA process.

The sensitivity analysis for interest rate risk illustrates how changes in the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates at the reporting date.

A parallel shift upwards or downwards of 25 basis points in interest rates across the yield curve would result in additional loss or gain for the year of $3.6 million gross of tax (2020: $2.5 million) with an equal impact on net assets, assuming all other assumptions remain unchanged.

Currency risk

FUL assesses its exposure to currency risk through its regular monitoring against the Board agreed risk appetite limits.

The Group's and FUL's actual net currency matching exposure is reported in the quarterly CRO report to the FUL Board.

Asset and liability matching risk

FUL assesses its exposure to asset and liability matching risk through its regular monitoring against the Board agreed risk appetite limits in respect of currency mismatches and the average durations of the investment and liability portfolios.

The Group's and FUL's actual net currency matching exposure and investment and liability portfolios are reported in the quarterly CRO report to the FUL Board.

iv. Risk concentration of market risk

Market risk concentrations may occur in relation to geographic locations, currency, asset duration, industry sectors and counterparties. The potential for the build-up of concentration risk is monitored on a frequent basis against the investment manager guidelines, investment portfolio benchmarks (that are based upon the findings from the strategic allocation exercise), and the Board’s stated risk appetite limits.

C1.3 Counterparty default risk

i. Overview of counterparty default risk

Counterparty default risk exposures relate to the potential failure of a third-party to meet their financial obligations to the Company, and explicitly excludes counterparty default risk in relation to the investment portfolio. Key areas where the Company is exposed to counterparty default risk are:

(i) Reinsurers' share of insurance liabilities;
(ii) Amounts due from reinsurers in respect of claims already paid;
(iii) Amounts due from insurance contract holders; and
(iv) Amounts due from insurance intermediaries.

ii. Risk mitigation techniques for counterparty default risk

Reinsurer counterparties

The risk management approach to counterparty default risk is designed to limit potential reinsurance and broker counterparty default to a level consistent with the risk appetite through a combination of:

(i) Appropriate counterparty selection;
(ii) Appropriate levels of diversification in the portfolio;
(iii) Appropriate mitigation in respect of external counterparties with a lower security rating through the use of collateralisation and/or downgrade clauses as appropriate; and
(iv) Monitoring changes in security and taking appropriate remedial action as required.

The Counterparty Security Committee meets at least half yearly, and ad hoc as new partners are proposed. The RRC monitors the Group's aggregations which are reported to the FIHL, FIBL and FUL Boards on a quarterly basis in the CRO Report.

In certain circumstances, deposits from reinsurers are also held as collateral.

Intragroup reinsurer counterparty

The counterparty risk presented by the IGR arrangement is mitigated through the use of collateralisation in the form of trust accounts with BNY Mellon as the trustee, FIBL as grantor and FUL as beneficiary. FIBL has deposited assets in the trust account, to secure its obligations to FUL, under the IGR arrangement.

As at the end of 2021 the FUL Board set a minimum level of collateralisation of between 111% and 116% of the sum of a) FUL's reserves for losses and loss adjustment expenses reported and outstanding and incurred but not reported; and b) FUL's unearned premium reserves minus premiums payable and deferred acquisition costs, provided that this number shall never be less than zero. Confirmation that the level of actual and required collateral has been met is monitored and reported quarterly to the FUL Board.

Intermediary counterparty risk

Whilst in theory FUL has significant exposure to counterparty risk in respect of its dealings with insurance intermediaries, in practice these are limited through the use, for the most part, of non-risk transfer terms of business.

As such, FUL is prepared to tolerate significant outstanding broker balances reflecting the concentration of business in the markets in which it operates subject to regular monitoring and the reporting of material exposures to management and the Board. Credit control policies and procedures are in place to ensure all money owed to FUL is collected and to ensure that material cash received is allocated appropriately. Due to the significant growth in the company, unallocated cash and overdue balances have increased. Appropriate steps have been taken to reduce overdue amounts and the time taken to allocate cash.

Credit control meetings, where delinquent accounts are reviewed, are held weekly and include a representative from underwriting, finance and operations. Weekly meetings are held with underwriters who assist with the collection of premiums when required and if no response is forthcoming, a notice of cancellation may be issued.

iii. Risk assessment of counterparty default risk

Reinsurance is used to manage and mitigate underwriting risk; however, this does not discharge the Company's liability as the primary insurer. If a reinsurer fails to pay a claim, the Company remains liable for the payment to the policyholder. The creditworthiness of reinsurers is considered on an annual basis by reviewing their financial strength prior to finalisation of any contract. In addition, management assesses the creditworthiness of its reinsurers and intermediaries by reviewing credit grades provided by rating agencies and other publicly available financial information.

Exposures to individual policyholders, groups of policyholders and intermediaries are also monitored on an ongoing basis through the company's credit control processes.

The risk appetite limits on the level of intermediary and reinsurance counterparty default risk are reviewed and approved annually by the FUL Board.

Counterparty default risk is also assessed as a part of the stress and scenario testing undertaken as a part of the ORSA process.

iv. Risk concentration of counterparty default risk

Counterparty default risk concentrations may occur in relation to either reinsurer counterparties, insurance contract holders or insurance intermediaries. The potential for the build-up of concentration risk is monitored on a frequent basis against the Board's stated risk appetite limits.

C1.4 Liquidity risk

i. Overview of liquidity risk

Liquidity risk relates to the risk of the Company being unable to meet its liabilities as they fall due to a lack of available cash. FIHL has unconditionally and irrevocably guaranteed all of FUL's financial obligations.

ii. Risk mitigation techniques for liquidity risk

FUL's investment portfolio consists of a highly liquid fixed income portfolio and cash. The Company's investment guidelines and risk, capital and solvency appetite formalise FUL's appetite for liquidity at the portfolio level. This level of required liquidity across the overall portfolio is one of the drivers for the construction and maintenance of the investment portfolio. This results in liquidity levels being maintained significantly in excess of that which would otherwise be required to support projected outflows related to insurance obligations even in stressed scenarios. Furthermore, FUL has the right to request immediate settlement of material recoveries (those in excess of $10.0 million on a gross of IGR basis) under the IGR agreement with FIBL.

The Company's exposure to liquidity risk is regularly monitored through its liquidity risk appetite which is dominated by its strategic imperative to maintain a highly liquid investment portfolio. The Company maintains a predominantly cash and fixed-income investment portfolio, with the main goal of the investment policy to maximise income under the constraints of capital conservation.

Subject to maintaining sufficient liquidity in aggregate across entities, FUL has the ability to perform intragroup transactions in the event of temporary liquidity shortfalls at individual entity level. This obviates incurring costs that might result from raising entity-specific liquidity through external means.

At the Group level the target minimum level of liquidity is designed to ensure that the Company can satisfy policyholder liabilities in a stressed environment requiring sufficient cash liquidity at 5 days, 30 days and 180 working days to cover a variety of pre-defined gross man-made and natural catastrophe loss events.

FUL has also established liquidity buffers that are equivalent to the assets required to be held for it to meet 1, 5, 30 and 180 working day stress tests based on its own assets and exposures after taking into account expected recoveries from the intra-group reinsurance arrangements.

iii. Risk assessment of liquidity risk

Liquidity risk is assessed on a regular basis against the stress tests defined in the Company's liquidity risk appetite statement, as well as a part of the stress and scenario testing undertaken during the ORSA process.

The results of the quarterly liquidity stress tests and the amount of the invested assets that are expected to be able to be liquidated within 5 days are reported to the FUL Board in the CRO report.

iv. Risk concentration of liquidity risk

Liquidity risk concentrations may occur in relation to the nature of the underlying assets that FUL invests in, as well as the custodians, banks, credit institutions and bond issuers that FUL places its cash and investments with.

The potential for the build-up of concentration risk is monitored on a frequent basis against investment manager guidelines, investment portfolio benchmarks (that are based upon the findings from the strategic allocation exercise), and the Board's stated risk appetite limits.

v. Expected profit included in future premiums (EPIFP)

Liquidity risk also takes account of EPIFP. The Company recognises that EPIFP can contribute to an increase or decrease in future net cash flows and therefore can act to increase or reduce liquidity risk.

EPIFP is the expected present value of the future cash-flows of legally obliged insurance contracts where the future incomings are larger than future outgoings. This value forms part of the calculation of Solvency II TPs

The EPIFP as at 31 December 2021 is $75.0m (2020: $67.2m). The calculation of the EPIFP has been performed to understand the level of expected profit within premiums that are expected to be received in the future. This calculation has inherent uncertainty as it is on a planning basis and actual outcome may differ materially.

C1.5 Operational risk

i. Overview of assessment of operational risk

Operational risk relates to the risk of losses arising from adverse external events, or from inadequate or failed processes, people or systems. FUL sets high standards for its operations and maintains a simple operating structure designed to limit operational risk and ensure effective identification and appropriate action in the event of risks crystallising.

Operational risk is considered from a range of internal and external sources according to whether it has the potential to exacerbate the intrinsic losses that may be suffered and / or crystallise in a specific financial loss or other adverse impact.

Sources of risk are considered under the following broad categories:

- Failure of a core business process, people or system to contain intrinsic risk within the Board's approved appetite e.g. failure to underwrite within underwriting authority / maximum lines;

- Failure of a process, people or system and / or external events leading to a specific financial loss or impact over and above that resulting from intrinsic risk exposures e.g. a failure to comply with anti-money laundering policy resulting in fine or sanction; and

- Failure of process, people or systems leading to loss of opportunity (i.e. not necessarily a capital impact but one that adversely impacts potential risk adjusted returns) e.g. failure to effectively maintain broker relationships leading to a loss of income.

ii. Risk mitigation techniques used for operational risk

The Company maintains an operational risk and controls register encompassing all material operational risks and the controls designed to prevent, mitigate or detect them.

On a quarterly basis the CRO and/or a member of the risk management function meets with individual risk owners to discuss and document any changes to risks, controls or processes. The meeting includes an open discussion encompassing changes to business and processes, new or developing emerging risks and any other topics raised by the risk owners.

A disaster recovery plan and a business continuity plan are both in place to mitigate the impact to the Company of a failure in FUL's IT systems or a loss of access to its premises.

In respect of key person risk, Fidelis has succession plans in place that are reviewed and updated on at least an annual basis to mitigate the impact of the departure of key individuals from the organisation.

The utilisation of documented policies and procedures also mitigates against the risk of a loss of knowledge from the Company.

iii. Risk assessment of operational risk

On at least an annual basis, and at such points in the development of the Company where material changes are made to the operating structure, relevant risk owners are required to reassess and reaffirm the full scope of risks, controls and related assessments for which they are responsible.

The resulting assessment is recorded and subject to review, challenge and approval by the risk management function.

An assessment of key risks and any material changes in the period is reported by the CRO to the RCC supported by a summary of key points from the risk owner discussions. Material changes to the scope, nature or assessments of risks and controls are reported to the internal audit function to inform the audit planning and review process.

In the event of a material operational risk crystallising, a risk learning exercise will be undertaken to understand the root causes and identify mitigating factors or steps to reduce the probability and / or impact of a recurrence where appropriate.

The conclusions from this exercise and the results of the follow up action will be reported to senior management and agreed with the relevant risk / control owner(s) and summarised in CRO reporting to the RCC and the FUL Board.

Operational risk is also assessed as part of the stress and scenario testing undertaken within the ORSA process.

iv. Risk concentration of operational risk

Operational risk concentrations may occur in relation to an overreliance on key individuals within the organisation, or the dependency on third-parties, key systems and processes that the Company utilises.

Operational risk is monitored on a regular basis against the Board's stated risk appetite limits.

C1.6 Other material risks

Emerging risk

i. Overview of emerging risk

Emerging risks are defined as the risks that are either previously unknown, or which were to some extent known but that are evolving in unexpected ways, and that have the potential to develop in such a way as to impact the balance sheet.

FUL identifies and monitors new and developing emerging risks through a range of channels including but not limited to:

- Regular communication with underwriters in respect of areas of risk material to their portfolios;
- Liaison with asset managers and advisors in respect of emerging macroeconomic, geopolitical and societal risks;
- The FUL CRO's and other members of the Risk Management function's reviews with risk owners conducted via the operational risk management process; and
- The FUL CRO's and other members of the risk management function's review of relevant external inputs, publications and periodic surveys.

ii. Risk mitigation techniques used for emerging risks

An emerging risk register is maintained by the risk management function and emerging or crystallising risks are reported to the RCC and the Board in aggregate through the regular CRO reporting process.

In the event of a new or developing emerging risk representing a material risk, the CRO will escalate as appropriate in order that appropriate mitigation can be implemented.

iii. Risk assessment of emerging risks

FUL assesses its exposure to emerging risks through the review and updating of the emerging risk register.

On an annual basis the emerging risk register is presented to the FUL Board.

iv. Risk concentration of emerging risks

Emerging risk concentrations may occur in relation to a broad range of areas covering environmental, political, economic, social and technological developments.

Reinsurance availability risk

i. Overview of reinsurance availability risk

Reinsurance availability risk refers to the inability of the ceding company or the primary insurer to obtain insurance from a reinsurer at the right time and at an appropriate cost. The inability may emanate from a variety of reasons such as unfavourable market conditions.

This risk does not include reinsurer default risk which is covered under C1.3 above.

ii. Risk mitigation techniques used for reinsurance availability risk

All reinsurance purchases must be authorised appropriately to ensure alignment to strategy and risk appetite and in accordance with operating guidelines.

The majority of FUL's and the Group's elemental reinsurance programs renew at 1st January, however exposures are not all written at the 1st January, therefore, if there is a mismatch FUL and the Group are aware of before the inward exposure is written. FUL also benefits from the catastrophe bonds that the Group has purchased on a multi-year coverage basis. Throughout the year, FUL also enters into facultative reinsurance arrangements to manage its exposures in Bespoke and Specialty lines.

iii. Risk assessment of reinsurance availability risk

The risk is monitored on a regular basis against the Board's stated risk appetite limits.

iv. Risk concentration of reinsurance availability risk

Reinsurance availability risk concentrations may occur in relation to reinsurance contracts placed relating to a particular class of business, a particular counterparty or at a specific period of time.

Group and strategic risk

i. Overview of Group and strategic risk

Group and strategic risk are defined as the risk of impact on shareholder value, earnings or capital arising from adverse business decisions, improper implementation of decisions, or lack of responsiveness to industry changes. Within this definition the Group has identified four key sub-categories of risk:

- **Communication risk:** The risk that the Group fails to define, maintain or adequately communicate its strategy and, as a result, cannot take advantage of strategic opportunities;
- **Capital planning risk:** The risk that the Company has insufficient capital at the right time to take advantage of strategic opportunities;
- **Reputational and regulatory risk**: The risk that adverse events or circumstances negatively affect the reputation of the Group with its rating agencies, regulators, policyholders, intermediaries, existing or prospective investors; and
- **Group contagion risk:** The risk that adverse events or circumstances affecting one or more business units or entities damage the solvency, liquidity, results or reputation of other entities or the overall Group.

ii. Risk mitigation techniques used for Group and strategic risk

The Company uses Group resources in a number of areas, including IT and risk management. Group risk is assessed, managed, monitored and reported as part of the Company's risk management processes. The Company seeks to manage strategic risks to the business by ensuring that the business strategies and resources are compatible with the strategic goals and the economic situation of the markets in which it operates.

iii. Risk assessment of Group and strategic risk

Strategic risk is assessed at least annually, as a part of the CRO's review of the strategy.

Group risk is assessed as part of the ORSA process.

iv. Risk concentration of Group and strategic risk

Group risk concentrations may occur in relation to an overreliance by the Company on key individuals, systems, processes and financial resources of the Group.

Group and strategic risk are included within and monitored against the Board's stated operational risk appetite limits on a frequent basis.

C2. RISK EXPOSURES

C2.1 Material risks and risk measures

The figures in the table below detail the current material risks for FUL as part of the SCR as at 31 December 2021 compared to 2020:

	2021	2020
$ millions		
Non-life underwriting risk	413.6	349.5
Market risk	46.3	37.3
Counterparty default risk	58.0	19.6
Diversification	(58.0)	(35.4)
BSCR	**459.9**	**371.0**
Operational risk	40.4	13.3
SCR	**500.3**	**384.3**

The FUL Board is updated on at least a quarterly basis as to whether the current risk profile is within the approved risk appetite tolerances and expected to remain so. As part of the ORSA process, these risks have been subject to a series of plausible but extreme stress and scenario tests covering each of these risk categories and the liquidity of the Company's assets following these events. There have been no material changes in these processes during the year.

The most material risk that FUL faces relates to non-life underwriting risk. An overview of how this risk is assessed and the key risk mitigation tools employed are detailed in Section C1.1.i above.

During 2021, the most material movement has been an increase in the non-life underwriting risk charge, reflecting the growth in the business during 2021. The increase in market risk reflects an increase in currency mis-matches. Counterparty default risk has increased due to an increase in exposure to ceded recoveries and higher level of overdue premiums.

C2.2 Investment of assets in accordance with prudent person principle

The Company is required to invest the assets used to cover the MCR and the SCR in accordance with the "prudent person principle". The prudent person principle defines that the assets must be invested in a manner that a "prudent person" would – that is that the decisions are generally accepted as being sound for the average person.

FUL fulfils its obligations required by the Solvency II Directive to ensure that its assets are invested in line with the prudent person principle by investing in a portfolio of fixed income securities which is highly diversified across asset types, sectors, geographies and issuers. FUL's portfolio is in line with its risk appetite and includes only investment-grade corporate bonds, investment-grade structured credit, investment-grade government bonds, cash or cash equivalents. These assets are all considered to be of a high quality and liquidity. The investment portfolio is monitored on a regular basis to ensure that it remains at an appropriate level of quality and liquidity whilst avoiding excessive concentrations.

C3. RISK SENSITIVITY

The following plausible but extreme scenario tests were undertaken as part of the ORSA process that was presented to the FUL Board in March 2021. These scenarios were developed by a subcommittee of the Board, comprising the Chair of the RCC, the FUL CEO, the FUL CFO, the FUL Chief Actuary and the FUL CRO and were reviewed by the RRC. The aim of the scenarios is to provide a range of realistic challenges to the business plan covering the key risk categories that the Company is exposed to, and to test the potential range of responses to the outcomes.

- A loss event due to two aircraft colliding – this scenario resulted in a post event solvency ratio of 116%.
- An aviation terror event and a related property terror event – this scenario resulted in a post event solvency ratio of 142%.
- A repeat of the 2012 natural catastrophe events and an unrelated material man-made realistic disaster scenario event – this scenario resulted in a post event solvency ratio of 131%.
- The financial effects of climate change on underwriting and investment performance – this scenario resulted in a post-loss solvency ratio of 134%.
- The impact of a 1-in-100 year global economic downturn on underwriting and investment performance – this scenario results in a post-loss solvency ratio of 123%.
- A port explosion with multiple marine insurance related total losses – this scenario resulted in a post-loss scenario solvency ratio of 109%.

Under all of the above plausible but extreme scenarios the Company is projected to maintain its own funds above the MCR and SCR in 2022.

C4. ANY OTHER INFORMATION

C4.1 Climate change

Climate change represents one of the greatest long-term risks for the insurance industry. It is expected that climate change will lead to an increase in the frequency and severity of extreme weather events in the long term. Fidelis' risk-management competence and risk models allow for the assessment of these risks of change and to develop new solutions for the Company's primary insurance and reinsurance clients.

See section A5 for more information regarding the business.

C4.2 COVID-19

<u>Operational Impact</u>

Following the outbreak of the COVID-19 pandemic the business continuity plan was activated for both FUL and the Fidelis Group. The pandemic has resulted in no disruption to our client or customer service capabilities, FUL continues to bind business and assess and settle claims. The potential for losses arising from COVID-19 has been and will continue to be monitored and discussed by management, and are currently immaterial.

C4.3 UKRAINE / RUSSIA

On February 24, 2022, the Russian Federation invaded Ukraine resulting in armed conflict in Ukraine and the Black Sea ("Ukraine Conflict"). Subsequently a number of countries, including the United States of America, the United Kingdom, and those in the European Union, placed significant sanctions on Russian institutions and persons which resulted in a devaluation of the Rouble and a fall in the value of Russian fixed income and equity assets, and the prompt withdrawal of companies from Russia without securing their assets. Fidelis has minimal direct exposure to Russian equities and minimal exposure to fixed income assets impacted by sanctions. Fidelis has potential exposure to losses associated with the conflict in Ukraine and the Black Sea through certain lines in the Bespoke and Specialty segments. As a recent subsequent event, and in the light of the fluid nature of the Ukraine Conflict, there are a number of complexities and implications that will need to be evaluated and determined on an ongoing basis before Fidelis can reasonably estimate potential losses which could potentially be material. However, Fidelis does not believe the impact of the Ukraine Conflict will adversely affect the Company's ability to operate as a going concern.

C4.3 Unconditional Guarantee from FIHL

It should also be noted that FUL has an unconditional guarantee from FIHL for all of its financial obligations, however, FUL does not plan to rely on this guarantee and none of the extreme but plausible stress tests that have been run in the previous ORSA report resulted in a scenario that FUL needed to rely on this guarantee.

D. VALUATION FOR SOLVENCY PURPOSES

The Company's financial statements are prepared under the historical cost convention, as modified by the inclusion of certain investments at fair value and in accordance with FRS 102 “The Financial Reporting Standard applicable in the UK and Republic of Ireland” ("FRS 102") and FRS 103 "Insurance Contracts" ("FRS 103") issued by the Financial Reporting Council. The table below shows the differences in the valuation and classification of assets and liabilities per the Company’s financial statements to the valuation for solvency purposes as at 31 December 2021:

$ millions	**Valuation per UK GAAP**	**Valuation and re-classification adjustments**	**Valuation per Solvency II**
Assets			
Cash and cash equivalents	76.9	—	76.9
Investments	799.8	4.1	803.9
Deferred acquisition costs	106.0	(106.0)	—
Reinsurance recoverables / Ceded TPs	326.7	(347.8)	(21.1)
Recoverable accrual	85.8	—	85.8
Ceded unearned premium reserve	687.2	(687.2)	—
Insurance and intermediaries receivables	699.9	(628.7)	71.2
Subrogation recovery on paid claims	160.2	(160.2)	—
Deferred tax assets	5.1	(2.3)	2.8
Any other assets, not elsewhere shown	88.4	(19.9)	68.5
Total assets	**3,036.0**	**(1,948.0)**	**1,088.0**
Liabilities			
Investment liabilities	0.1	—	0.1
TPs	1,610.5	(1,269.5)	341.0
Reinsurance payables	641.6	(641.6)	—
Any other liabilities, not elsewhere shown	97.0	(47.1)	49.9
Total liabilities	**2,349.2**	**(1,958.2)**	**391.0**

The table below shows the differences in the valuation and classification of assets and liabilities per the Company's financial statements to the valuation for solvency purposes as at 31 December 2020:

$ millions	**Valuation per UK GAAP**	**Valuation and re-classification adjustments**	**Valuation per Solvency II**
Assets			
Cash and cash equivalents	37.0	—	37.0
Investments	749.5	2.7	752.2
Deferred acquisition costs	62.2	(62.2)	—
Reinsurance recoverables / Ceded TPs	603.1	(620.2)	(17.1)
Recoverable accrual	36.1	—	36.1
Insurance and intermediaries receivables	492.9	(443.1)	49.8
Deferred tax assets	0.2	(0.2)	—
Any other assets, not elsewhere shown	20.7	(2.9)	17.8
Total assets	**2,001.7**	**(1,125.9)**	**875.8**
Liabilities			
Technical provisions	997.0	(774.5)	222.5
Reinsurance payables	379.8	(379.8)	—
Deferred tax liabilities	—	5.3	5.3
Any other liabilities, not elsewhere shown	63.8	—	63.8
Total liabilities	**1,440.6**	**(1,149.0)**	**291.6**

D1. ASSETS

D1.1 Investments

As at 31 December 2021, the Company had $780.3 million of investments which are carried at fair value of $803.9 million under Solvency II.

The table below shows the Company's investment assets at fair value by material class of investment under Solvency II principles as at 31 December 2021:

$ millions	**Level 1**	**Level 2**	**Total**
Debt securities and other fixed income securities			
Government bonds	108.9	83.6	192.5
Corporate bonds	—	561.6	561.6
Collateralised securities	—	30.5	30.5
Collective Investments Undertakings	—	19.4	19.4
Total debt securities and other fixed income securities	108.9	695.1	804.0
Derivative assets	—	—	—
Total assets	108.9	695.1	804.0
Derivative liabilities	(0.1)	—	(0.1)
Net assets at fair value	**108.8**	**695.1**	**803.9**

The Company's investment portfolio is valued using the following methodology for Solvency II purposes:

- Level 1 - investments are securities with quoted prices in active markets as at 31 December 2021 is $108.8 million (2020: $48.6 million). An active market is one in which transactions for the asset occurs with sufficient frequency and volume to provide readily and regulatory available quoted prices.
- Level 2 - investments are securities with quoted market prices in active markets for similar assets with adjustments to reflect factors specific to the asset, including the condition or location of the asset, the extent to which inputs relate to items that are comparable to the asset and the volume or level of activity in the markets within which the inputs are observed as at 31 December 2021 is $695.1 million (2020: $427.1 million)
- Level 3 – investments are securities where no active market or other transactions can be used as a good estimate of fair value. FUL did not have any level 3 assets as at 31 December 2021 is $nil (2020: $nil).

Using this levelling criteria, this equates to the fair value of the securities.

D1.2 Cash and cash equivalents

As at 31 December 2021, the Company held $76.9 million as cash and cash equivalents (2020: $37.0 million). Cash and cash equivalents carrying amounts are considered to be as approximate fair values on the basis that these are short term assets, therefore there are no differences between the valuations under Solvency II and UK GAAP.

D1.3 Insurance and intermediaries receivables

Insurance and intermediaries receivables represent premiums owed from policyholders. As at 31 December 2021, the Company had a total of $699.9 million of outstanding premiums per UK GAAP (2020: $492.9

million). For Solvency II purposes, an adjustment is made to remove non-overdue receivables leaving an insurance and intermediaries receivables balance of $71.2 million (2020: $49.8 million). The non-overdue receivables balance is considered within the calculation of the TPs as they are used as the basis for the future premiums and claims reinsurance recoveries elements.

Under UK GAAP, insurance and intermediaries receivables are measured at amortised cost less any impairment losses. Under Solvency II, receivables are measured at fair value. Due to the short-term nature of the receivables, the UK GAAP carrying value represents a fair approximation of the market consistency valuation under Solvency II.

D1.4 Deferred acquisition costs

Deferred acquisition costs comprise brokerage and commission incurred on contracts less ceded deferred acquisition costs written during the financial year, but expensed over the term of the insurance contract. As at 31 December 2021, deferred acquisition costs was $106.0 million per UK GAAP (2020: $62.2 million). Deferred acquisition costs are removed under Solvency II principles, however future cash flows of unpaid acquisition costs are accounted for within the TPs (see D2.1).

D1.5 Reinsurance recoverables / Ceded TPs

As at 31 December 2021, reinsurance recoverables were $326.7 million under UK GAAP and under Solvency II are reflected in TPs (2020: $603.1 million). Reinsurance recoverables are held at amortised cost less any impairment, which approximates to fair value given the short-term nature of these assets. For Solvency II purposes, reinsurance recoverables are determined as part of the calculation for TPs (see D2.1). Under UK GAAP reinsurer's share of subrogation recovery on paid claims of $81.4 million has been disclosed within reinsurance recoverables.

D1.6 Recoverable accrual

Reinsurance receivables comprise reinsurance recoverables on paid claims and totalled $85.8 million as at 31 December 2021 under UK GAAP (2020: $36.1 million). Reinsurance recoverable accrual carrying amounts are considered to be as approximate fair values on the basis that these are short term assets, therefore there are no differences between the valuations under Solvency II and UK GAAP.

D1.7 Deferred tax asset and liabilities

Deferred taxes are calculated based on the differences between the values ascribed to assets and liabilities on a Solvency II basis, as opposed to a UK GAAP basis, and the values ascribed to the same assets and liabilities for tax purposes. Deferred taxes at the balance sheet date have been measured using these enacted tax rates and reflected in these financial statements. This means that the 25% main rate of corporation tax will be relevant for any timing differences expected to reverse on or after 1 April 2023. Corporation tax receivable/payable has not been relieved at full value and losses will be carried forward and the deferred tax asset at 31 December 2021 has been calculated at 25% (2020: 19%).

The value of the deferred tax asset per UK GAAP is $5.1m as at 31 December 2021 (2020: $0.2 million). On a Solvency II basis the deferred tax asset is $2.8 milion.

D1.8 Subrogation recovery on paid claims

Subrogation assets of $160.2 million on claims paid during 2021 relating to the expected recovery via the sale or lease of repossessed property has been disclosed within subrogation recovery on paid claims. The recoverable amounts have been estimated by considering, amongst other evidence, a range of values provided by expert valuation consultancies. There is a risk that the final amounts realised for the subrogation assets materially differ from these estimates. As this is not overdue at the balance sheet date it is reclassified into TPs on a Solvency II basis.

D1.9 Any other assets, not elsewhere shown

As at 31 December 2021, other assets which primarily comprise intercompany receivables, were $88.4m per UK GAAP and are valued at amortised cost less any impairment which approximates to fair value given the short-term nature of these assets (2020: $20.7 million). The adjustment to $68.5m on a Solvency II basis is driven by the $4.1 million of accrued interest to investments and the $15.6 million reclassification of group reinsurance purchases to TPs.

D2. TECHNICAL PROVISIONS

D2.1 Value of TPs by line of business

The table below shows the TPs as at 31 December 2021 by line of business:

	Direct and accepted proportional business					Accepted non-proportional business			
$ millions	**Marine, aviation and transport insurance**	**Fire and other damage to property insurance**	**General liability**	**Credit and suretyship insurance**	**Miscellaneous financial loss**	**Casualty**	**Marine, aviation and transport**	**Property**	**Total**
Premium provisions: Gross	(30.4)	(1.5)	38.9	(3.6)	13.7	(0.1)	(4.6)	(21.2)	(8.9)
Premium provisions: Ceded	(2.3)	(15.4)	19.3	13.5	4.2	(5.8)	—	(31.0)	(17.6)
Premium provisions: Net	**(28.1)**	**13.9**	**19.6**	**(17.1)**	**9.5**	**5.7**	**(4.6)**	**9.8**	**8.7**
Claims provisions: Gross	43.8	139.9	37.2	(126.8)	76.0	4.7	9.2	111.6	295.6
Claims provisions: Ceded	(1.0)	1.3	5.8	(57.9)	10.3	3.7	(0.5)	34.8	(3.5)
Claims provisions: Net	**44.8**	**138.6**	**31.4**	**(68.9)**	**65.7**	**1.0**	**9.7**	**76.8**	**299.1**
Risk margin	8.1	16.4	8.2	5.9	7.6	0.5	1.9	5.7	54.3
TPs	**24.8**	**168.9**	**59.2**	**(80.1)**	**82.8**	**7.2**	**7.0**	**92.3**	**362.1**

I. TPs methodology

The TPs are calculated as the sum of a best estimate of the liabilities and a risk margin. The best estimate portion of the TPs represents the sum of probability-weighted average future cash flows in respect of all policies that are legally obliged as at the valuation date, taking into account the time value of money (expected present value of future cash flows) using EIOPA risk-free interest rate term structure. These future cash flows include future premium receipts, future claims payments, future reinsurance spend, future reinsurance recoveries and associated future expense cash flows. For Solvency II, these cash flows are split into premium provision (unearned element of future cash flows including premiums and claims) and claims provision (earned element of future cash flows including premiums and claims). The methodology employed in the calculation for TPs is consistent across all lines of business.

The risk margin is calculated by assessing the cost of capital required to run-off FUL's existing book of business and allocated between Solvency II lines of business in line with its insurance premium volume measure within the Standard Formula calculation.

Subrogation due to losses relating to missed loan financing payments has been disclosed within claims provision in credit and suretyship insurance.

II. TPs assumptions

The key assumptions underlying the TPs calculation are:

- **Expected claims**
  Expected claims on earned business are taken directly from the UK GAAP reserves, while unearned claims are determined using IELRs based on Fidelis data, industry data and expert judgement.

- **ENIDs**
  Under Solvency II, the mathematical mean of the distribution of all possible future outcomes should be captured. Therefore, a load is added to the future losses to allow for ENIDs which would not be captured in the best estimate calculated on a UK GAAP basis.

- **Expenses**

  The TPs make allowance for the expenses incurred in servicing the legal obligations of contracts and these include acquisition costs, reinsurance costs, ULAE, administrative and investment expenses.

- **Interest rates**
  The future cash flows are discounted using the standard risk-free rate term structure provided by EIOPA. The matching adjustment or the volatility adjustment has not been utilised.

The assumptions within each class can vary, for example the loss ratios and ENID ratios that are parameterised using industry data. Outside of differences in assumptions, there are no material differences in the methodological approach taken for each line of business.

D2.2 Level of uncertainty associated with the value of TPs

The TPs represent the best estimate of all future cash flows that arise due to writing insurance business. There is inherent uncertainty within the cash flows that relate to insurance contracts, which could arise due to volatility within the claims reserve, losses occurring within the unearned exposure, policy cancellations and other areas.

The actuarial function has run a series of sensitivity tests to investigate areas of uncertainty within the TPs. The results of the sensitivity testing indicate the TPs are highly sensitive to the business mix. FUL has exposure to multi-year deals with large volumes of premium to be received. The TP is therefore, on a relative basis, more sensitive to changes in expected future premiums and claims.

Given FUL’s low historical claims experience, loss ratios are currently parameterised using industry data blended with underwriter and actuarial judgement. Whilst considered the most reliable benchmark, actual experience could diverge significantly from industry experience. Similarly, FUL parameterises other assumptions using a combination of expert judgement and limited internal data, which gives rise to uncertainty. Parameter uncertainty is expected to reduce over time as more weight can be placed on internal data.

D2.3 Solvency II and UK GAAP valuation differences of TPs by material line of business

The table below shows a build up from the UK GAAP valuation of insurance contract liabilities to the Solvency II TPs, split by line of business, as at 31 December 2021:

	Direct and accepted proportional business					Accepted non-proportional business			
$ millions	**Marine, aviation and transport insurance**	**Fire and other damage to property insurance**	**General liability**	**Credit and suretyship insurance**	**Miscellaneous financial loss**	**Casualty**	**Marine, aviation and transport**	**Property**	**Total**
Gross UK GAAP insurance contract liabilities	81.1	146.8	34.9	19.1	15.3	13.0	11.5	153.4	475.0
Solvency II adjustments	(67.7)	(8.4)	41.2	(149.5)	74.4	(8.4)	(6.9)	(63.1)	(188.3)
Gross BEL	**13.4**	**138.4**	**76.1**	**(130.4)**	**89.7**	**4.6**	**4.6**	**90.3**	**286.7**
Net UK GAAP insurance contract liabilities	26.2	24.6	18.1	19.6	(4.0)	3.0	4.0	(28.9)	62.6
Solvency II adjustments	(9.5)	127.9	32.9	(105.6)	79.2	3.7	1.1	115.6	245.3
Net BEL	**16.7**	**152.5**	**51.0**	**(86.0)**	**75.2**	**6.7**	**5.1**	**87.7**	**307.9**
Risk margin	8.1	16.4	8.2	5.9	7.6	0.5	1.9	5.7	54.3
TPs	**24.8**	**168.9**	**59.2**	**(80.1)**	**82.8**	**7.2**	**7.0**	**92.3**	**362.2**

The main differences between the Solvency II and UK GAAP valuation bases are:

- The expected profit in the unearned premium, discounting and profit in the BBNI (all of which reduce the liabilities); and
- Additional allowances required under Solvency II such as ENIDs, expenses and the risk margin (all of which increase the liabilities).

  ENID is an allowance for 'events not in data'. This is to allow for the possibility that the data being used to parameterise the loss costs may not be allowing for all possible outcomes that may arise. Loss ratios are parameterised using industry data and our selections are made with all possible future events in mind, however we allow for additional ENIDs on specific earned and all unearned business to allow for all "unknown unknowns".
  In line with Solvency II guidance, expenses are modelled separately for ULAE, investment and administration expenses. Acquisition and reinsurance costs are netted off future premiums. We allow for implicit inflation on investment and administration expenses in line with claims costs.

Risk margin is calculated as the cost of regulatory capital necessary to run-off all liabilities.

D3. OTHER LIABILITIES

D3.1 Reinsurance payables

As at 31 December 2021, reinsurance payables were $641.6 million per UK GAAP. Reinsurance payables are measured at amortised cost less any impairment. Given the short-term nature of reinsurance payables, this approximates to fair value under UK GAAP. There are no differences in principle between Solvency II and UK GAAP valuations of reinsurance payables. However, for Solvency II purposes, the non-overdue element of reinsurance payables is considered as part of the calculation for TPs. None of the reinsurance payables balance was overdue as at 31 December 2021.

D3.2 Investments liabilities

See section D1.1 above.

D3.3 Any other liabilities, not elsewhere shown

As at 31 December 2021, all other payables were $97.0 million per UK GAAP and $49.9 million per Solvency II. The adjustment of $(47.1) million is a reclassification from intercompany payables to TPs of amounts owed to other Fidelis entities for group reinsurance purchases. Other payables, which includes accruals, intercompany payables, and deferred income, are measured at amortised cost less any impairment which approximates to fair value under UK GAAP given the short-term nature of these liabilities.

D4. ALTERNATIVE METHODS FOR VALUATION

The Company does not use any alternative methods for valuation of its assets, TPs or other liabilities.

E. CAPITAL MANAGEMENT

E1. OWN FUNDS

The objective of own funds management is to maintain, at all times, sufficient capital for regulatory and rating agency purposes with an appropriate buffer (based on an underwriting shock). These funds should be of sufficient quality to meet the eligibility requirements in the Solvency II rules as enacted. The Company holds regular meetings of senior management, which are at least quarterly, in which the ratio of eligible own funds over the SCR and MCR are reviewed. The committees that review the Company's solvency are described in more detail in *B. System of Governance (unaudited)*, and responsibility ultimately rests with FUL's Board. As part of own funds management, the Company prepares at least annual solvency projections and reviews the structure of own funds and future requirements. The business plan, which forms the basis of the ORSA, contains a three-year projection of funding requirements and this helps focus actions for future funding.

The total structure and movement of the Company's own funds shown below:

	Tier 1	Tier 2	Tier 3	Total
$ millions				
Called up share capital	7.5	—	—	7.5
Share premium account	505.8	—	—	505.8
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	—	—	—	—
Reconciliation reserve	70.9	—	—	70.9
Balance as at 31 December 2020	**584.2**	**—**	**—**	**584.2**
Share issue	75.0	—	—	75.0
Ancillary own funds	—	50.0		50.0
Change in deferred tax and reconciliation reserve	34.8	—	2.8	37.6
Movement in 2021 own funds	**109.8**	**50.0**	**2.8**	**162.6**
Called up share capital	7.5	—	—	7.5
Share premium account	580.8	—	—	580.8
Deferred tax asset	—	—	2.8	2.8
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	—	50.0	—	50.0
Reconciliation reserve	105.7	—	—	105.7
Balance as at 31 December 2021	**694.0**	**50.0**	**2.8**	**746.8**

The Company's ordinary share capital, share premium arising on ordinary share capital and reconciliation reserve are all available as tier 1 unrestricted own funds per Article 69 (a)(i) of the Delegated Regulation. The ordinary share capital and share premium arising is not subordinated and has no restricted duration.

The reconciliation reserve represents the excess of assets over liabilities, less a deduction equal to the share capital and the share premium account. The increase in own funds is due to a capital contribution of

$75.0 million from FIHL to FUL for the issue of one share approved by the FIHL Board on 23 February 2021 to support business growth.

Additionally, in December 2021 the PRA granted approval to the Company for $50 million of AOF that is reflected in regulatory capital, to aid expected growth. The AOF is an irrevocable standby letter of credit issued to the Company by Lloyds Bank Corporate Markets plc pursuant to a facility agreement entered into between Lloyds and FIHL. The letter of credit was issued on 15 December 2021 for a term of four years, following receipt of PRA approval on 2 December 2021.

Tier 1 own funds are eligible to meet both the SCR and the MCR and are permanently available to cover potential losses. The MCR can only be covered by eligible basic own funds.

The following table shows the difference between equity as shown in the financial statements and the Solvency II excess of assets over liabilities:

$ millions	**2021**	**2020**
Total UK GAAP equity	686.8	561.1
Valuation adjustments relating to TPs	12.4	28.7
Deferred tax effect	(2.4)	(5.6)
Ancillary own funds	50.0	—
Total own funds	746.8	584.2

The amount of own funds available and eligible to cover the SCR and the MCR is summarised in the table below:

$ millions	**Total**	**Tier 1 - unrestricted**	**Tier 2**	**Tier 3**
Total available own funds to meet the SCR	746.8	694.0	50.0	2.8
Total available own funds to meet the MCR	694.0	694.0	—	—
Total eligible own funds to meet the SCR	746.8	694.0	50.0	2.8
Total eligible own funds to meet the MCR	694.0	694.0	—	—
SCR	500.3			
MCR	125.1			
Ratio of eligible own funds to SCR	149.3 %			
Ratio of eligible own funds to MCR	554.8 %			

The valuation differences relating to TPs are detailed in section D2.3 above.

E2. SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

E2.1 SCR and MCR as at 31 December 2021 and 31 December 2020:

	2021	2020
$ millions		
SCR*	500.3	384.3
MCR	125.1	96.1
SCR coverage ratio	149.3%	152.0%

*The final amount of the SCR is still subject to supervisory assessment.

E2.2 SCR split by risk module

The capital requirement is being calculated exclusively by the Standard Formula. The risk charges per category as at 31 December 2021 compared to as at 31 December 2020 are outlined below:

	2021	2020
$ millions		
Non-life underwriting risk	413.6	349.5
Market risk	46.3	37.3
Counterparty default risk	58.0	19.6
Diversification	(58.0)	(35.4)
BSCR	**459.9**	**371.0**
Operational risk	40.4	13.3
SCR	**500.3**	**384.3**

The increase in non-life underwriting risk of $64.1 million is driven by an increase in the premium and reserve risk subcomponent. This is due to premium growth, in particular fire and other damage to property. There was an overall increase in catastrophe risk, driven by higher retention ratios, with material movements especially in the natural catastrophe subcomponent owing to flood and windstorm.

The increase in market risk of $9.0 million reflects the increase in the sensitivity of net assets to the discount rate, growth in the bond portfolio and a greater volume of asset to liability currency mismatching at 2021 Q4 (driven by an increase in the volume of GBP and EUR mismatching on a Solvency II basis. Counterparty default risk has increased $38.4 million due to an increase in overdue premiums.

Diversification has increased $22.6 million in line with premium growth.

Operational risk has increased $27.1 million due to substantial growth in premiums from 2019 to 2020 and 2020 to 2021.

E2.3 Simplified calculations for risk modules of the Standard Formula

The Standard Formula methodology follows the full calculation for premium and reserve risk, default risk and market risk.

E2.4 Inputs used to calculate the MCR

The MCR targets an 80% value at risk over a one-year time horizon. The MCR is based on proportions of net premiums written in the previous 12 months and the net best estimate of TPs at the valuation date. These are supplied by Solvency II class of business and the proportions vary by class.

The table below shows the inputs into the MCR calculation as at 31 December. The MCR is calculated using a linear formula, subject to a floor of 25% and a cap of 45% of the SCR. The MCR is further subject to an absolute floor that reflects the nature of the undertaking (as defined in Article 129 (1) (d) of Directive 2009/138/EC). This has been converted into US Dollars below at the 31 December foreign exchange rate:

	2021	**2020**
$ millions		
Absolute floor	4.3	4.3
Linear MCR	101.9	62.1
SCR	500.3	384.3
Combined MCR	125.1	96.1
MCR	**125.1**	**96.1**

The change in the absolute floor reflects the movement in the exchange rate. The final MCR (currently equivalent to the 25% floor of the SCR) reflects an increase in the overall SCR.

E2.5 Any material change to the SCR and to the MCR over the reporting period, and the reasons for any such change.

The SCR and MCR increased materially over the reporting period driven by increased catastrophe risk reflecting a higher volume of underlying exposures.

E3. USE OF THE DURATION-BASED EQUITY RISK SUB-MODULE IN THE CALCULATION OF THE SCR

The duration-based equity risk sub-module does not apply to FUL.

E4. DIFFERENCES BETWEEN THE STANDARD FORMULA AND ANY INTERNAL MODEL USED

The Company does not have an approved internal model to calculate its SCR and therefore this section is not applicable.

E5. NON-COMPLIANCE WITH MCR AND SCR

There has not been any non-compliance with the SCR or MCR over the financial year. If the SCR or MCR were to be breached, plans would be put into place to raise additional capital as required.

A. GLOSSARY

AOF – Ancillary Own Funds
BBNI – Bound But Not Incepted
BSCR – Basic Solvency Capital Requirement
CEO – Chief Executive Officer
CFO – Chief Finance Officer
Combined ratio – The ratio of net losses, and net operating expenses (acquisition and administrative costs) to net premiums earned
CTO – Chief Technology Officer
CRESTA - Catastrophe Risk Evaluation and Standardising Target Accumulations
CRO – Chief Risk Officer
CUO – Chief Underwriting Officer
EEA – European Economic Area
EIOPA – European Insurance and Occupational Pensions Authority
ENID – Events not in Data
EPIFP – Expected Profit included in Future Premiums
ERM – Enterprise Risk Management
ESG - Environmental, Social and Governance
FCA – Financial Conduct Authority
HIA – Head of Internal Audit
IBNR - Incurrecd But Not Reported
IELR – Initial Expected Loss Ratio
IIA – Institute of Internal Auditors
IGR – Intra-group Reinsurance
INED – Independent non-executive director
ISA (UK) – International Standards on Auditing (UK)
Lloyds – Lloyds Bank Corporate Markets plc
MGA – Managing General Agent
MCR – Minimum Capital Requirement
Net acquisition cost ratio – The ratio of net acquisition expenses to net premiums earned
Net loss ratio – The ratio of net losses to net premiums earned
Net underwriting contribution – Net premiums earned less net losses, less net acquisition expenses
Net operating expense – Net acquisition expenses and administrative expenses
OEP – Occurrence Exceedance Probability
ORSA – Own Risk and Solvency Assessment
PML – Probable Maximum Loss
PRA – Prudential Regulation Authority
QRT – Quantitative Reporting Templates
RCC - Risk and Capital Committee
RDS – Realistic Disaster Scenarios
Risk and Controls Register – Encompasses all material operational risks and the controls designed to prevent, mitigate or detect risks to the business achieving its strategic objectives
ROE - Return on Equity
RRC – Risk and Return Committee
RSU – Restricted Share Unit
SCR – Solvency Capital Requirement
SFCR – Solvency and Financial Condition Report
SMCR – Senior Managers and Certification Regime

SMF – Senior Insurance Management Function
TPs – Technical Provisions
UK GAAP – United Kingdom Generally Accepted Accounting Practice
ULAE – Unallocated Loss Adjustment Expenses
UMCC – Underwriting and Marketing Conference Calls

B. QUANTITATIVE REPORTING TEMPLATES (“QRTs”)

The following QRTs are required for the SFCR:

QRT Ref	QRT Template name
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

The templates are included at the end of this report.

S.02.01.02
Balance sheet (in $ thousands)

		Solvency II value
	Assets	C0010
R0010	Goodwill	
R0020	Deferred acquisition costs	
R0030	Intangible assets	0
R0040	Deferred tax assets	2,760
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	803,884
R0080	*Property (other than for own use)*	0
R0090	*Holdings in related undertakings, including participations*	0
R0100	*Equities*	0
R0110	*Equities - listed*	
R0120	*Equities - unlisted*	
R0130	*Bonds*	784,482
R0140	*Government Bonds*	192,459
R0150	*Corporate Bonds*	561,511
R0160	*Structured notes*	0
R0170	*Collateralised securities*	30,512
R0180	*Collective Investments Undertakings*	19,402
R0190	*Derivatives*	0
R0200	*Deposits other than cash equivalents*	0
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	0
R0240	*Loans on policies*	0
R0250	*Loans and mortgages to individuals*	
R0260	*Other loans and mortgages*	
R0270	Reinsurance recoverables from:	-21,121
R0280	*Non-life and health similar to non-life*	-21,121
R0290	*Non-life excluding health*	-21,121
R0300	*Health similar to non-life*	0
R0310	*Life and health similar to life, excluding index-linked and unit-linked*	0
R0320	*Health similar to life*	
R0330	*Life excluding health and index-linked and unit-linked*	
R0340	*Life index-linked and unit-linked*	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	71,182
R0370	Reinsurance receivables	85,784
R0380	Receivables (trade, not insurance)	144
R0390	Own shares (held directly)	0
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	76,864
R0420	Any other assets, not elsewhere shown	68,402
R0500	**Total assets**	1,087,899

	Liabilities	Solvency II value
R0510	Technical provisions - non-life	341,098
R0520	*Technical provisions - non-life (excluding health)*	341,098
R0530	*TP calculated as a whole*	0
R0540	*Best Estimate*	286,749
R0550	*Risk margin*	54,348
R0730	Other technical provisions	
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	0
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	0
R0780	Deferred tax liabilities	0
R0790	Derivatives	121
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	0
R0830	Reinsurance payables	0
R0840	Payables (trade, not insurance)	0
R0850	Subordinated liabilities	0
R0860	*Subordinated liabilities not in BOF*	0
R0870	*Subordinated liabilities in BOF*	0
R0880	Any other liabilities, not elsewhere shown	49,899
R0900	**Total liabilities**	391,118
R1000	**Excess of assets over liabilities**	696,781

S.05.01.02
Premiums, claims and expenses by line of business (in $ thousands)

	Non-life	**Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)**					**Line of business for: accepted non-proportional reinsurance**			**Total**
		Marine, aviation and transport insurance	**Fire and other damage to property insurance**	**General liability insurance**	**Credit and suretyship insurance**	**Miscellaneous financial loss**	**Casualty**	**Marine, aviation, transport**	**Property**	
		C0060	C0070	C0080	C0090	C0120	C0140	C0150	C0160	C0200
	Premiums written									
R0110	*Gross - Direct Business*	226,775	353,595	170,342	71,720	108,615				931,047
R0120	*Gross - Proportional reinsurance accepted*	46,412	160,823	-23,826	1,147	151				184,706
R0130	*Gross - Non-proportional reinsurance accepted*						33,580	9,534	164,960	208,074
R0140	*Reinsurers' share*	173,519	358,805	75,364	33,903	61,683	14,906	7,762	135,873	861,816
R0200	*Net*	99,667	155,613	71,152	38,964	47,082	18,673	1,773	29,087	462,011
	Premiums earned									
R0210	*Gross - Direct Business*	152,698	266,648	67,173	33,276	42,205				561,999
R0220	*Gross - Proportional reinsurance accepted*	13,472	132,651	-3,461	7,056	579				150,297
R0230	*Gross - Non-proportional reinsurance accepted*						21,104	41,680	164,249	227,033
R0240	*Reinsurers' share*	106,809	267,626	28,956	19,067	23,758	15,966	27,274	135,960	625,417
R0300	*Net*	59,361	131,673	34,756	21,265	19,026	5,138	14,405	28,289	313,913
	Claims incurred									
R0310	*Gross - Direct Business*	64,597	161,476	20,024	1,164	7,117				254,378
R0320	*Gross - Proportional reinsurance accepted*	5,240	21,098	674	590	3,833				31,436
R0330	*Gross - Non-proportional reinsurance accepted*						8,502	8,154	168,934	185,589
R0340	*Reinsurers' share*	43,440	109,297	11,195	242	5,583	5,505	5,730	148,384	329,375
R0400	*Net*	26,397	73,278	9,503	1,512	5,367	2,997	2,424	20,550	142,028
	Changes in other technical provisions									
R0410	*Gross - Direct Business*	0	0	0	0	0				0
R0420	*Gross - Proportional reinsurance accepted*	0	0	0	0	0				0
R0430	*Gross - Non-proportional reinsurance accepted*						0	0	0	0
R0440	*Reinsurers' share*	0	0	0	0	0	0	0	0	0
R0500	*Net*	0	0	0	0	0	0	0	0	0
R0550	**Expenses incurred**	16,685	27,446	21,466	13,561	18,686	1,637	1,907	7,127	108,516
R1200	**Other expenses**									0
R1300	**Total expenses**									108,516

S.05.02.01

Premiums, claims and expenses by country (in $ thousands)

		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	Non-life	**Home Country**	**Top 5 countries (by amount of gross premiums written) - non-life obligations**					**Total Top 5 and home country**
R0010			**US**	**CA**	**AU**	**NZ**	**JP**	
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
	Premiums written							
R0110	*Gross - Direct Business*	400,776	426,172	21,723	23,653	14,964	1,038	888,326
R0120	*Gross - Proportional reinsurance accepted*	-22,353	98,308	16,434	5,743	2,165	7,117	107,414
R0130	*Gross - Non-proportional reinsurance accepted*	2,540	148,794	2,534	2,219	0	4,998	161,086
R0140	*Reinsurers' share*	252,383	434,978	26,559	19,160	10,503	7,462	751,045
R0200	*Net*	128,580	238,296	14,132	12,456	6,627	5,691	405,781
	Premiums earned							
R0210	*Gross - Direct Business*	169,715	283,815	19,960	12,928	6,717	3,201	496,336
R0220	*Gross - Proportional reinsurance accepted*	3,395	68,975	10,778	9,523	3,958	3,001	99,630
R0230	*Gross - Non-proportional reinsurance accepted*	13,725	142,244	1,854	1,703	56	3,990	163,571
R0240	*Reinsurers' share*	119,530	340,727	21,160	15,391	6,813	5,669	509,290
R0300	*Net*	67,305	154,306	11,433	8,762	3,918	4,523	250,246
	Claims incurred							
R0310	*Gross - Direct Business*	64,593	139,500	6,541	7,003	4,441	1,303	223,380
R0320	*Gross - Proportional reinsurance accepted*	1,211	17,939	1,586	1,995	829	454	24,014
R0330	*Gross - Non-proportional reinsurance accepted*	12,613	160,069	700	1,849	-73	2,360	177,519
R0340	*Reinsurers' share*	52,158	221,958	7,434	4,755	2,558	3,235	292,099
R0400	*Net*	26,259	95,550	1,393	6,092	2,639	882	132,814
	Changes in other technical provisions							
R0410	*Gross - Direct Business*							0
R0420	*Gross - Proportional reinsurance accepted*							0
R0430	*Gross - Non-proportional reinsurance accepted*							0
R0440	*Reinsurers' share*							0
R0500	*Net*	0	0	0	0	0	0	0
R0550	**Expenses incurred**	30,201	55,970	3,319	2,926	1,556	1,337	95,309
R1200	**Other expenses**							
R1300	**Total expenses**							95,309

S.17.01.02
Non-Life Technical Provisions (in $ thousands)

		Direct business and accepted proportional reinsurance					Accepted non-proportional reinsurance			
		Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Miscellaneous financial loss	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	Total Non-Life obligation
		C0070	C0080	C0090	C0100	C0130	C0150	C0160	C0170	C0180
R0010	**Technical provisions calculated as a whole**	0	0	0	0	0	0	0	0	0
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole									0
	Technical provisions calculated as a sum of BE and RM									
	Best estimate									
	Premium provisions									
R0060	**Gross - Total**	-30,426	-1,514	38,887	-3,636	13,672	-57	-4,602	-21,181	-8,857
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	-2,266	-15,371	19,252	13,501	4,243	-5,815	39	-31,195	-17,611
R0150	**Net Best Estimate of Premium Provisions**	-28,160	13,857	19,634	-17,137	9,428	5,757	-4,641	10,014	8,754
	Claims provisions									
R0160	**Gross - Total**	43,814	139,904	37,229	-126,762	76,048	4,722	9,171	111,480	295,606
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	-994	1,263	5,779	-57,859	10,322	3,749	-505	34,735	-3,510
R0250	**Net Best Estimate of Claims Provisions**	44,808	138,641	31,450	-68,903	65,726	973	9,677	76,745	299,117
R0260	**Total best estimate - gross**	13,388	138,390	76,116	-130,398	89,720	4,665	4,570	90,300	286,749
R0270	**Total best estimate - net**	16,648	152,498	51,085	-86,040	75,155	6,730	5,036	86,759	307,870
R0280	**Risk margin**	8,147	16,441	8,210	5,854	7,562	545	1,864	5,724	54,348
	Amount of the transitional on Technical Provisions									
R0290	TP as a whole	0	0	0	0	0	0	0	0	0
R0300	Best estimate	0	0	0	0	0	0	0	0	0
R0310	Risk margin	0	0	0	0	0	0	0	0	0
R0320	**Technical provisions - total**	21,535	154,831	84,326	-124,544	97,282	5,210	6,433	96,023	341,098
R0330	**Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total**	-3,260	-14,108	25,031	-44,357	14,566	-2,065	-467	3,541	-21,121
R0340	**Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total**	24,796	168,939	59,295	-80,186	82,717	7,275	6,900	92,483	362,219

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Non-Life insurance claims (in $ thousands)

Total Non-life business

Z0020 Accident year / underwriting year: Underwriting Year

Gross Claims Paid (non-cumulative)

(absolute amount)

		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
	Year				**Development year**								**In Current**	**Sum of years**
		0	1	2	3	4	5	6	7	8	9	10 & +	**year**	**(cumulative)**
R0100	Prior											0	0	0
R0160	N-9	0	0	0	0	0	0	0	0	0	0		0	0
R0170	N-8	0	0	0	0	0	0	0	0	0			0	0
R0180	N-7	0	0	0	0	0	0	0	0				0	0
R0190	N-6	0	0	0	0	0	0	0					0	0
R0200	N-5	344	4,285	7,473	2,249	7,635	57,258						57,258	79,245
R0210	N-4	1	562	3,902	15,823	70,690							70,690	90,979
R0220	N-3	4,299	15,499	12,341	50,699								50,699	82,839
R0230	N-2	770	11,803	35,313									35,313	47,886
R0240	N-1	28,802	92,381										92,381	121,182
R0250	N	79,197											79,197	79,197
R0260												**Total**	385,538	501,328

Gross undiscounted Best Estimate Claims Provisions

(absolute amount)

		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
	Year				**Development year**								**Year end**
		0	1	2	3	4	5	6	7	8	9	10 & +	**(discounted data)**
R0100	Prior											0	0
R0160	N-9	0	0	0	0	0	0	0	0	0	0		0
R0170	N-8	0	0	0	0	0	0	0	0	0			0
R0180	N-7	0	0	0	0	0	0	0	0				0
R0190	N-6	0	0	0	0	0	0	0					0
R0200	N-5	16,300	19,214	21,849	16,074	2,590	-59,059						-57,695
R0210	N-4	4,037	29,587	24,172	19,633	-44,802							-44,740
R0220	N-3	16,672	39,707	43,413	-14,679								-20,090
R0230	N-2	3,779	72,604	56,403									54,951
R0240	N-1	68,850	110,683										108,166
R0250	N	259,370											255,014
R0260												**Total**	295,606

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Own Funds (in $ thousands)

	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	**Total**	**Tier 1 unrestricted**	**Tier 1 restricted**	**Tier 2**	**Tier 3**
		C0010	C0020	C0030	C0040	C0050
R0010	Ordinary share capital (gross of own shares)	7,500	7,500		0	
R0030	Share premium account related to ordinary share capital	580,800	580,800		0	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0070	Surplus funds	0	0			
R0090	Preference shares	0		0	0	0
R0110	Share premium account related to preference shares	0		0	0	0
R0130	Reconciliation reserve	105,721	105,721			
R0140	Subordinated liabilities	0		0	0	0
R0160	An amount equal to the value of net deferred tax assets	2,760				2,760
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0

Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be

		Total
R0220	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified	0

Deductions

		Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
R0230	Deductions for participations in financial and credit institutions	0				
R0290	**Total basic own funds after deductions**	696,781	694,021	0	0	2,760

Ancillary own funds

		Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
R0300	Unpaid and uncalled ordinary share capital callable on demand	0				
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings,	0				
R0320	Unpaid and uncalled preference shares callable on demand	0				
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	50,000			50,000	
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0				
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0390	Other ancillary own funds	0				
R0400	**Total ancillary own funds**	50,000			50,000	0

Available and eligible own funds

		Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
R0500	Total available own funds to meet the SCR	746,781	694,021	0	50,000	2,760
R0510	Total available own funds to meet the MCR	694,021	694,021	0	0	
R0540	Total eligible own funds to meet the SCR	746,781	694,021	0	50,000	2,760
R0550	Total eligible own funds to meet the MCR	694,021	694,021	0	0	

		Total
R0580	**SCR**	500,309
R0600	**MCR**	125,077
R0620	**Ratio of Eligible own funds to SCR**	149.26%
R0640	**Ratio of Eligible own funds to MCR**	554.87%

	Reconciliation reserve	C0060
R0700	Excess of assets over liabilities	696,781
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	
R0730	Other basic own fund items	591,060
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	
R0760	**Reconciliation reserve**	105,721

	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	75,036
R0790	**Total Expected profits included in future premiums (EPIFP)**	75,036

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Solvency Capital Requirement - for undertakings on Standard Formula (in $ thousands)

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	46,299		
R0020	Counterparty default risk	58,047		
R0030	Life underwriting risk	0		
R0040	Health underwriting risk	0		
R0050	Non-life underwriting risk	413,646		
R0060	Diversification	-58,050		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	459,941		

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	40,368
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency Capital Requirement excluding capital add-on**	500,309
R0210	Capital add-ons already set	0
R0220	**Solvency capital requirement**	500,309
	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	C0109
R0590	Approach based on average tax rate	0

	Calculation of loss absorbing capacity of deferred taxes	**LAC DT**
		C0130
R0640	**LAC DT**	
R0650	LAC DT justified by reversion of deferred tax liabilities	0
R0660	LAC DT justified by reference to probable future taxable economic profit	0
R0670	LAC DT justified by carry back, current year	0
R0680	LAC DT justified by carry back, future years	0
R0690	Maximum LAC DT	0

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Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity (in $ thousands)

	Linear formula component for non-life insurance and reinsurance obligations	C0010
R0010	MCR_{NL} Result	101,906,029

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	**Net (of reinsurance) written premiums in the last 12 months**
		C0020	C0030
R0020	Medical expense insurance and proportional reinsurance	0	0
R0030	Income protection insurance and proportional reinsurance	0	0
R0040	Workers' compensation insurance and proportional reinsurance	0	0
R0050	Motor vehicle liability insurance and proportional reinsurance	0	0
R0060	Other motor insurance and proportional reinsurance	0	0
R0070	Marine, aviation and transport insurance and proportional reinsurance	16,648	115,768
R0080	Fire and other damage to property insurance and proportional reinsurance	152,498	162,014
R0090	General liability insurance and proportional reinsurance	51,085	49,357
R0100	Credit and suretyship insurance and proportional reinsurance	0	14,991
R0110	Legal expenses insurance and proportional reinsurance	0	0
R0120	Assistance and proportional reinsurance	0	0
R0130	Miscellaneous financial loss insurance and proportional reinsurance	75,155	39,430
R0140	Non-proportional health reinsurance	0	0
R0150	Non-proportional casualty reinsurance	6,730	11,399
R0160	Non-proportional marine, aviation and transport reinsurance	5,036	0
R0170	Non-proportional property reinsurance	86,759	32,383

	Linear formula component for life insurance and reinsurance obligations	C0040
R0200	MCR_L Result	0

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	**Net (of reinsurance/SPV) total capital at risk**
		C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits		
R0220	Obligations with profit participation - future discretionary benefits		
R0230	Index-linked and unit-linked insurance obligations		
R0240	Other life (re)insurance and health (re)insurance obligations		
R0250	Total capital at risk for all life (re)insurance obligations		

	Overall MCR calculation	C0070
R0300	Linear MCR	101,906
R0310	SCR	500,309
R0320	MCR cap	225,139
R0330	MCR floor	125,077
R0340	Combined MCR	125,077
R0350	Absolute floor of the MCR	4,309
R0400	**Minimum Capital Requirement**	125,077