



# **FIDELIS INSURANCE IRELAND DESIGNATED ACTIVITY COMPANY**

## **Solvency and Financial Condition Report**

For the year 1 January 2021 to 31 December 2021

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## I. EXECUTIVE SUMMARY

Fidelis Insurance Ireland Designated Activity Company (“FIID” 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 FIID’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>.

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 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 50.

### BUSINESS AND PERFORMANCE

FIID is a 100% directly owned subsidiary of Fidelis European Holdings Limited (UK) (“FEHL”), which is 100% owned by Fidelis Insurance Bermuda Limited (“FIBL”) and is part of the Fidelis Group of companies (“the Group”), ultimately owned by Fidelis Insurance Holdings Limited (“FIHL”).

The Group also comprises Fidelis Underwriting Limited (“FUL”) and Fidelis Marketing Limited (“FML”), along with MGAs Pine Walk Capital Limited (“Pine Walk”), Pine Walk Europe SRL (“PWE”), Radius Specialty Limited (“Radius”), Oakside Surety Limited (“Oakside”), Kersey Specialty Limited (“Kersey”), Perigon Product Recall Limited (“Perigon”), Navium Marine Limited (“Navium”) and OPEnergy Limited (“OPEnergy”). FIID writes business through PWE’s Navium, Kersey, Perigon and Oakside divisions.

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

The Company has an ongoing intra-group reinsurance agreement with the Group’s Bermuda carrier, FIBL, to maintain its risk profile in line with FIID’s approved risk appetite.

FIID’s gross premiums written for the year ended 31 December 2021 were \$340.4 million (2020: \$164.0 million) with a net loss ratio of 28.7% (2020: 30.7%). These results are testament to FIID’s disciplined underwriting approach.

The net underwriting contribution for 2021 and 2020 are shown below:

	<u>2021</u>	<u>2020</u>
<b>\$ millions</b>		
Gross premiums written	340.4	164.0
Net premiums written	36.0	20.4
Net premiums earned	17.4	7.5
Net claims incurred	(5.0)	(2.3)
Net acquisition expenses	1.6	(0.1)
<b>Net underwriting contribution</b>	<b>14.0</b>	<b>5.1</b>
Net loss ratio	28.7 %	30.7%
Net acquisition cost ratio	(9.0)%	0.3%
Combined ratio	70.1 %	178.3%

The Company typically writes business with longer tenors and under Irish GAAP, premiums are earned over the duration of the contract, meaning that premiums written for such business will take longer to earn. The improvement in the Company’s combined ratio was driven by an increase in net earned premium as the Company has become more mature in its third year of operation.

## SYSTEM OF GOVERNANCE

The 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 FIID Board aligns its system of corporate governance with that of the Group where appropriate.

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

FIID 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 FIID’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 FIID’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. Each of these risk areas is described in more detail in section C.

Underwriting risk is a material component of FIID’s risk profile and is primarily driven by man-made catastrophe risk. All major underwriting risks, including man-made catastrophe risk, are captured within FIID’s RDS framework and are adequately reflected within the Standard Formula premium and catastrophe modules.

The Company has entered into an intra-group reinsurance agreement with FIBL, to maintain its risk profile in line with FIID’s approved risk appetite.

Investment risk is not considered to be a material component of FIID’s risk profile since FIID’s portfolio consists of cash, government and corporate bonds.

The level of FIID’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 ORSA, FIID has sufficient capital to withstand a 1-in-200 year loss event.

The United Kingdom (“UK”) exited the European Union (“EU”) on 31 January 2020, and the Fidelis Group is committed to its strategy of using FIID to underwrite EU/EEA bespoke and specialty insurance policies.

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 24 February 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 which resulted in a devaluation of the Rouble and a fall in the value of Russian fixed income and equity assets. The Company had no direct exposure to Russian equities or fixed income assets impacted by sanctions. The Company 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 this is a recent post balance sheet event, and in 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 the Company can reasonably estimate potential losses which potentially could be material. However, the Company 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 Irish 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 Irish GAAP.

## CAPITAL MANAGEMENT

FIID's capital management objective is to ensure that the Company maintains an appropriate level of capital, in terms of both quantity and quality, at all times, in line with its risk appetite and capital requirements, and that it fulfills 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 Company has not received capital contributions in 2021 (2020: contribution of \$60.0 million). The 2020 capital contributions were approved by the CBI as tier 1 capital.

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

	<u>2021</u>	<u>2020</u>
<b>\$ millions</b>		
Total Irish GAAP equity	105.4	100.7
Valuation adjustments relating to technical provisions	14.5	(0.1)
Deferred tax effect	(1.8)	-
<b>Total basic own funds</b>	<b><u>118.1</u></b>	<b><u>100.6</u></b>

Solvency II own funds of \$118.1 million were more than capital calculated on an Irish GAAP basis, driven by the movement in Irish GAAP technical provisions, solvency risk margin and additional expenses in running off Irish GAAP technical provisions. This is partially offset by expected profits in future premium.

See section E of this report for further details on the Company's Solvency II own funds.

The SCR, MCR, Solvency II own funds and SCR coverage ratio (ratio of eligible own funds to SCR) were as follows as at 31 December 2021 compared to 2020:

	<u>2021</u>	<u>2020</u>
<b>\$ millions</b>		
SCR	68.3	42.4
MCR	17.1	10.6
Solvency II eligible own funds	118.1	100.6
SCR coverage ratio	172.9%	237.5%

FIID benefits from a contractual intragroup guarantee provided by FIHL. Under the terms of the guarantee, FIHL undertakes to satisfy all liabilities of FIID in the event of its insolvency. This provides a degree of protection greater than that required by the Solvency II SCR.

Additionally, FIID entered into a capital maintenance agreement in 2021, which commits FIBL to provide sufficient capital to maintain FIID's regulatory solvency position equivalent to 105% of its Solvency II SCR Coverage Ratio. This agreement includes a clause that the commitment will be triggered if the FIID Board believes that the Solvency II SCR Coverage Ratio will drop below this position at any point over a subsequent nine-month period. FIBL is required to provide the funds within 15 Business Days of receipt of a valid demand from FIID under the agreement. Any funds provided under the agreement must be of a form that they can be used to meet FIID's solvency capital requirements.

## A. BUSINESS AND PERFORMANCE

### A1. BUSINESS

#### A1.1 Information regarding the business of the Company

FIID is a 100% directly owned subsidiary of FEHL, which is 100% owned by FIBL and is part of the Group, ultimately owned by FIHL. The Group is supervised by the Bermuda Monetary Authority.

The Group also comprises FUL and FML, along with MGAs Pine Walk, PWE, Radius, Oakside, Kersey, Perigon, Navium and OPEnergy. FIID writes business through PWE's Navium, Kersey, Perigon and Oakside divisions.

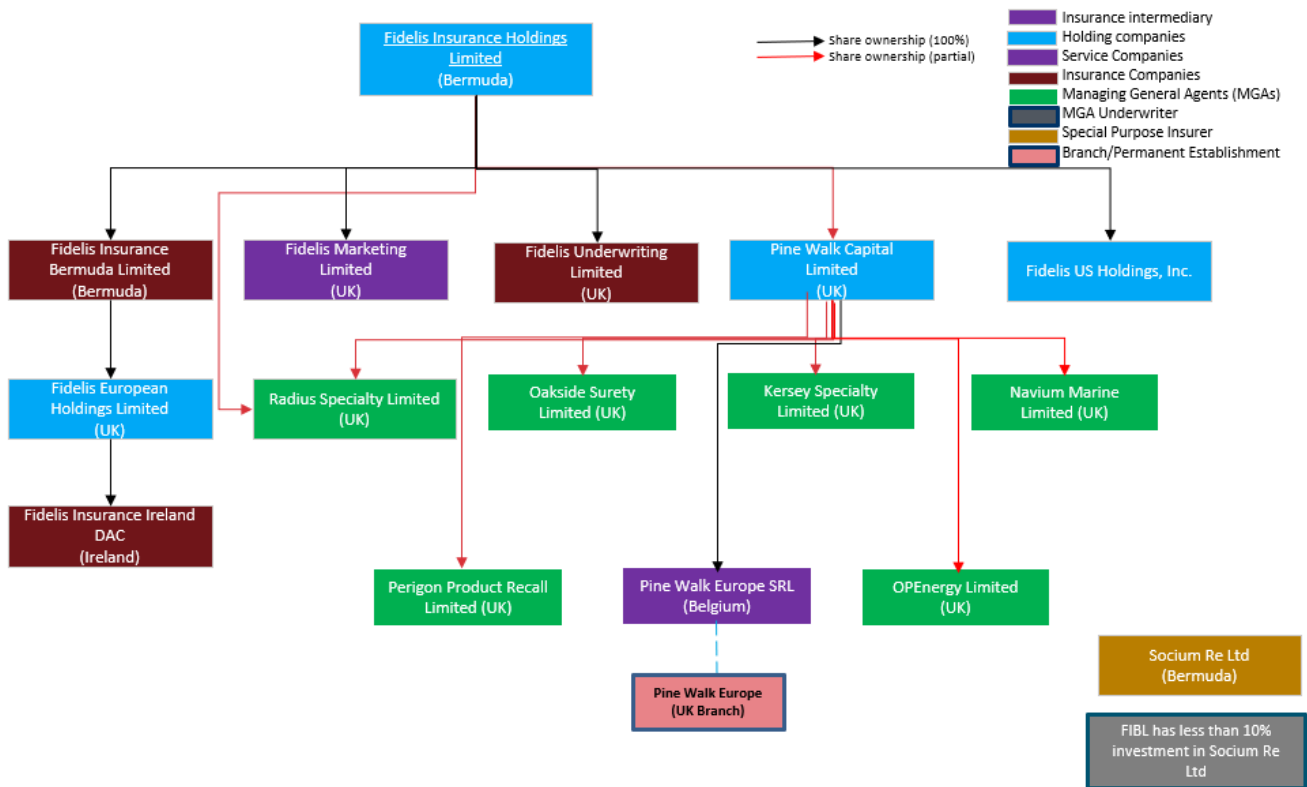
FIID is regulated by the CBI. The Company was incorporated on 27 December 2017 and received authorisation from the CBI to underwrite business on 22 October 2018.

Registered office: 70 Sir John Rogerson's Quay  
Grand Canal Dock  
Dublin 2  
Ireland.

Supervisory authorities: Central Bank of Ireland,  
PO Box 559,  
New Wapping Street,  
North Wall Quay,  
Dublin 1,  
Ireland.

External Auditors: KPMG Chartered Accountants  
1 Harbourmaster Place  
IFSC  
Dublin 1  
Ireland.

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 seven 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 marine, aviation and transport reinsurance and non-proportional property reinsurance.

FID's underwriting strategy is to write a mix of bespoke and specialty business, on both a direct basis and through MGAs.

## A2.2 Underwriting performance by Solvency II line of business 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	Marine, aviation, transport	Property	Total
Gross premiums written	111.7	40.2	59.5	108.2	19.7	0.4	0.7	340.4
Net premiums written	12.7	3.8	7.2	8.8	3.6	0.0	(0.1)	36.0
Net premiums earned	5.4	2.8	2.6	1.4	4.8	0.5	(0.1)	17.4
Net claims incurred	(2.6)	(0.5)	(0.7)	(0.7)	(0.3)	(0.2)	0.0	(5.0)
Net acquisition expenses	1.2	0.4	0.1	0.6	(0.9)	0.2	0.0	1.6
Net underwriting contribution	4.0	2.7	2.0	1.3	3.6	0.5	(0.1)	14.0
Net loss ratio	47.1 %	18.4 %	26.4 %	48.0 %	6.6 %	46.8 %	(10.8)%	28.4 %
Net acquisition cost ratio	(21.9)%	(15.9)%	(3.6)%	(42.1)%	19.7 %	(44.8)%	27.0 %	(9.0)%

Gross premiums written were \$340.4 million in 2021 (2020: \$164.0 million). The main driver for the growth was the continued rate improvement and market dislocation across specialty lines of business, whilst also entering into new relationships with MGAs to help drive new business. There was also significant growth in mortgage and regulatory capital relief credit deals as economic activity improved and the appetite to write economically-exposed business increased following COVID-19.

Net premiums written, which were impacted by the Group-wide whole account quota share cover that reinsures 20% of all business, were \$36.0 million (2020: 20.4 million) and reflected increased volumes during the year.

Net premiums earned for the year were \$17.4 million (2020: \$7.4 million), the increase reflective of the increase in volumes during the year, more short tenor business in the current year across specialty lines and the earn out of prior year business incepting late in 2020.

A total of \$5.0 million (2020: \$2.3m) of net claims were incurred during the year. The net loss ratio for 2021 was 28.4% (2020: 31.0%).

The ratio of net acquisition expenses to net premiums earned was (9.0)% (2020: 0.3%) with the decrease driven primarily by increased override commission income.



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).

During 2021 the Company 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 result. 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**

	<b>2021</b>	<b>2020 reclassified</b>	<b>2020 reported</b>
<b>\$ millions</b>			
Gross premiums written	111.7	25.9	35.4
Net premiums written	12.7	2.7	3.4
Net premiums earned	5.4	1.5	1.6
Net claims incurred	(2.6)	(0.5)	(0.6)
Net acquisition expenses	1.2	0.3	0.4
Net underwriting contribution	<b>4.0</b>	<b>1.4</b>	<b>1.4</b>
Net loss ratio	47.1%	34.1 %	39.5 %
Net acquisition cost ratio	(21.9)%	(21.9)%	(24.3)%

This class of business is inclusive of the Company's aviation, aerospace and marine lines.

The increase in gross premiums written was driven by the new PWE MGA relationship with Navium and an improved rating environment across all marine lines of business (\$56.3 million). There were large increases in space business relating to satellite launches and an improved rating environment across other aviation lines of business (\$29.5 million).

The increases in net premiums written and earned were reflective of the additional volumes during 2021.

The increase in the net loss ratio was driven by attritional losses in marine impacting the current underwriting and accident year.

## **Fire and other damage to property**

	<b>2021</b>	<b>2020 reclassified</b>	<b>2020 reported</b>
<b>\$ millions</b>			
Gross premiums written	40.2	16.5	5.9
Net premiums written	3.8	1.5	0.7
Net premiums earned	2.8	0.4	0.4
Net losses	(0.5)	(0.1)	0.0
Net acquisition expenses	0.4	0.1	0.1
Net underwriting contribution	<u>2.7</u>	<u>0.4</u>	<u>0.5</u>
Net loss ratio	18.4 %	35.2 %	10.4 %
Net acquisition cost ratio	(15.9)%	(24.3)%	(18.2)%

This class of business includes the Company's property, nuclear property and energy lines of business.

The increase in gross premiums written was mainly driven by the property book, written on both a direct basis and through MGA partnerships, reflecting a significant improvement in rates across certain types of property risks and in certain territories (\$26.6 million).

The increases in net premiums written and earned were reflective of the additional volumes during 2021 and the earn out of prior year premium.

The reduction in net loss ratio was driven by prior year development adversely impacting 2020.

**General liability**

	<b>2021</b>	<b>2020 reclassified</b>	<b>2020 reported</b>
<b>\$ millions</b>			
Gross premiums written	59.5	47.3	1.1
Net premiums written	7.2	5.4	0.2
Net premiums earned	2.6	0.3	0.1
Net claims incurred	(0.7)	(0.1)	0.0
Net acquisition expenses	0.1	0.0	0.0
Net underwriting contribution	<u>2.0</u>	<u>0.2</u>	<u>0.1</u>
Net loss ratio	26.4 %	33.9 %	84.3 %
Net acquisition cost ratio	(3.6)%	(2.8)%	3.9 %

This class of business is inclusive of the company's warranty, product recall and cyber books.

The increase in gross premiums written was mainly driven by warranty and product recall, where current year volumes were above prior year (\$8.2 million), in addition to a new cyber deal which was 100% fronted (\$4.0 million).

The increases in net premiums written and earned were reflective of the additional volumes in warranty and product recall, and the earn out of prior year premium where a significant proportion of business was written in the second half of the year.

The decrease in net loss ratio was driven by a release of prior year reserves in warranty due to a lack of claims activity relating to prior underwriting years.

## **Credit and suretyship**

	<b>2021</b>	<b>2020 reclassified</b>	<b>2020 reported</b>
<b>\$ millions</b>			
Gross premiums written	108.2	10.8	5.8
Net premiums written	8.8	0.7	0.1
Net premiums earned	1.4	0.5	0.3
Net claims incurred	(0.7)	(0.8)	(0.8)
Net acquisition expenses	0.6	0.4	0.4
Net underwriting contribution	<u>1.3</u>	<u>0.1</u>	<u>(0.1)</u>
Net loss ratio	48.0 %	171.3 %	254.0 %
Net acquisition cost ratio	(42.1)%	(90.9)%	(119.5)%

This class of business includes mortgage insurance, surety and other credit business.

The increase in gross premiums written was driven by significant growth in mortgage insurance and other credit business (\$78.9 million), following a change in risk appetite in response to the uplift in market conditions for credit exposed contracts following COVID-19. There were also increases in surety premiums (\$10.5 million), contract frustration (\$4.0 million) and political violence (\$4.1 million).

The increases in net written and net earned premiums were also reflective of the change in risk appetite and additional volumes.

The reduction in net loss ratio was driven by a high level of claims incurred in 2020 relating to Swedish surety losses which did not impact 2021.

The increase in net acquisition cost ratio was driven by an adjustment to 2019 underwriting year ceded acquisition costs which impacted the 2020 result. In the current year acquisition costs normalised to the weighted split of risks being written within mortgage insurance and surety.

### **Miscellaneous financial loss**

	<b>2021</b>	<b>2020 reclassified</b>	<b>2020 reported</b>
<b>\$ millions</b>			
Gross premiums written	19.7	58.4	110.6
Net premiums written	3.6	9.5	15.4
Net premiums earned	4.8	4.6	5.0
Net claims incurred	(0.3)	(0.6)	(0.6)
Net acquisition expenses	(0.9)	(0.9)	(0.9)
Net underwriting contribution	<u>3.6</u>	<u>3.1</u>	<u>3.5</u>
Net loss ratio	6.6 %	12.3 %	12.8 %
Net acquisition cost ratio	19.7 %	20.5 %	17.8 %

This class of business is inclusive of title and other bespoke categories.

The reduction in gross premiums written was largely driven by prior year adjustments on title (\$22.6 million). The decrease in net premiums written was reflective of the prior year adjustments.

Net premiums earned are in line with 2020, despite the reduction in net premiums written. A significant portion of the 2020 business incepted at the end of the year, as a result the majority of this business was earned during 2021.

The decrease in net loss ratio was driven by a release of prior year reserves in title business due to a lack of claims activity relating to prior underwriting years.

### A3. INVESTMENT PERFORMANCE

#### A3.1 Income and expenses from investments by asset class – Irish GAAP

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

	Investment income	Net realised losses	Change in net unrealised losses	Investment return
<b>\$ millions</b>				
Government bonds	0.8	(0.1)	(0.9)	(0.2)
Corporate bonds	1.5	(0.3)	(1.7)	(0.5)
Cash and other	0.0	—	—	0.0
Investment fees	—	—	—	(0.1)
Investment return	<u>2.3</u>	<u>(0.4)</u>	<u>(2.6)</u>	<u>(0.8)</u>

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

	Investment income	Net realised gains/(losses)	Change in net unrealised gains	Investment return
<b>\$ millions</b>				
Government bonds	0.9	0.4	0.1	1.4
Corporate bonds	0.4	(0.1)	0.1	0.4
Cash and other	0.1	—	—	0.1
Investment fees	—	—	—	(0.1)
Investment return	<u>1.4</u>	<u>0.3</u>	<u>0.2</u>	<u>1.8</u>

#### A3.2 Gains and losses recognised directly in equity

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

#### A3.3 Collateralised Securities

FIID did not hold any collateralised securities during 2021. The Company's investment advisory agreement allows for collateralised securities to be held providing they comply with Solvency II requirements, however to date none have been purchased.

#### A4. PERFORMANCE OF OTHER ACTIVITIES

Other material expenses comprise the following:

	<u>2021</u>	<u>2020</u>
<b>\$ millions</b>		
Employment costs	4.2	7.5
Non-employment costs	2.4	1.9
IT costs	1.0	0.9
Professional and consulting fees	1.2	0.7
Investment expenses	0.1	0.1
Total investment and administrative expenses	<u>8.9</u>	<u>11.1</u>

The Company does not have any direct employees. All of the Dublin based staff are employed by the Irish branch of FML. Administrative expenses for FIID are predominantly a result of recharges from other Group companies for providing physical infrastructure, staff and associated support services. The reduction in employment costs was driven by a reduction in Group recharged costs due to lower bonus and LTIP costs.

#### A5. OTHER INFORMATION REGARDING THE BUSINESS

FIID 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 FIID 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 in respect of both the ones that are in-force and those that are expected to be enacted in the future for the jurisdictions in which the Company operates as that could affect its assets. The Company achieves this through monitoring legal developments and maintaining a log of relevant regulatory developments.

Further details regarding the Group's commitments to its communities can be found here: <https://www.fidelisinsurance.com/corporate-responsibility/Our-Commitments>

Fidelis established 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:

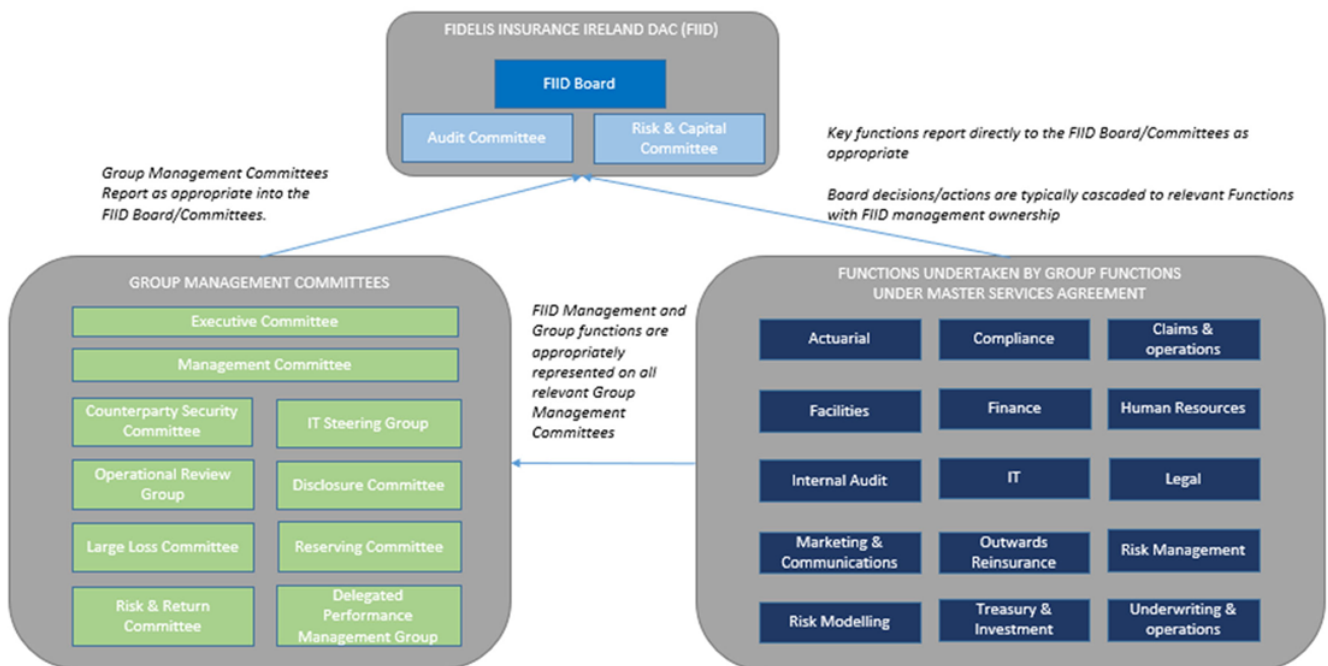
<https://www.fidelisinsurance.com/corporate-responsibility/the-fidelis-foundation>

## B. SYSTEM OF GOVERNANCE

### B1. GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE

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

FIID has implemented a simple yet effective system of corporate governance in a way which ensures the enterprise risk management is maintained at a high standard and that the business is operating in an efficient and effective manner. The FIID Board aligns its system of corporate governance with that of the Group where applicable. The diagram below presents an overview of FIID’s governance structures:



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

Board / Committee	INEDS	Exec	Role	Links into boards
Board	4	2	Considering and deciding on FIID’s strategy and matters affecting FIID, including matters referred for approval by FIHL committees, FIID committees or Group management committees	Considers, challenges and is the sole point of FIID approval. Matters cascaded from the FIHL Board may be approved, approved with subjectivities, amended or rejected by the FIID Board or referred back to the FIHL Board
Audit Committee	4	2	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 FIID Board on the outcome of the audit committee. The European General Counsel ensures any matters referred by the FIHL Board are so referred
Risk & Capital Committee	4	2	To advise the FIID Board in respect of risk and capital management and oversight of risk management and tolerances	The Committee Chair reports into the FIID Board. The Group Director of Underwriting ensures any matters referred by the FIHL Board are also referred to the FIID Board

FIID management is represented on all Group management committees. 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 FIID Boards/ 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 FIID Board by the FIID 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 FIID Board by the FIID 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 FIID Board consideration or approval are referred by the FIID CRO to the FIID Board in quarterly Board reporting
Counterparty Security Committee	Oversee development and adherence to outwards reinsurer and broker counterparty exposure tolerances	Matters requiring FIID Board consideration or approval are referred by the FIID CRO to the FIID 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 FIID Board consideration or approval are referred by the FIID CEO to the FIID Board.
Operational Review Group	Challenges, approves or declines New Business Initiatives and Delegated Underwriting/Claims Authorities from an operational view point, after in principle underwriting approval has been received	Matters requiring FIID Board consideration or approval are referred by the FIID Head of Compliance to the FIID 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 FIID Board consideration or approval are referred by the FIID CUO to the FIID 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 FIID Board materials for consideration and approval. The FIID CEO/ CFO will bring the filing to the FIID 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 FIID Board consideration or approval are referred by the FIID's Head of Actuarial Function to the FIID Board
Reserving Committee	Considers and opines on portfolio level reserves and IBNR for recommendation to the relevant Boards	Matters requiring FIID Board consideration or approval are referred by FIID's Head of Actuarial Function to the FIID Board in quarterly Board Reporting

The Company outsources key control functions with the Group, namely the Group HIA, who reports into the FIID Board and/or Committees as appropriate. The internal outsource to the Group-wide functions ensures appropriate seniority of the holders of the key control functions. When engaged on behalf of FIID, these individuals report to FIID's CEO and 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. There have, however, been a number of pre-approved controlled function (PCF) holder changes.

## **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 FIID's Board. The FIID Board does not deem it necessary to establish a separate FIID 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 caliber 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 FIID/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**

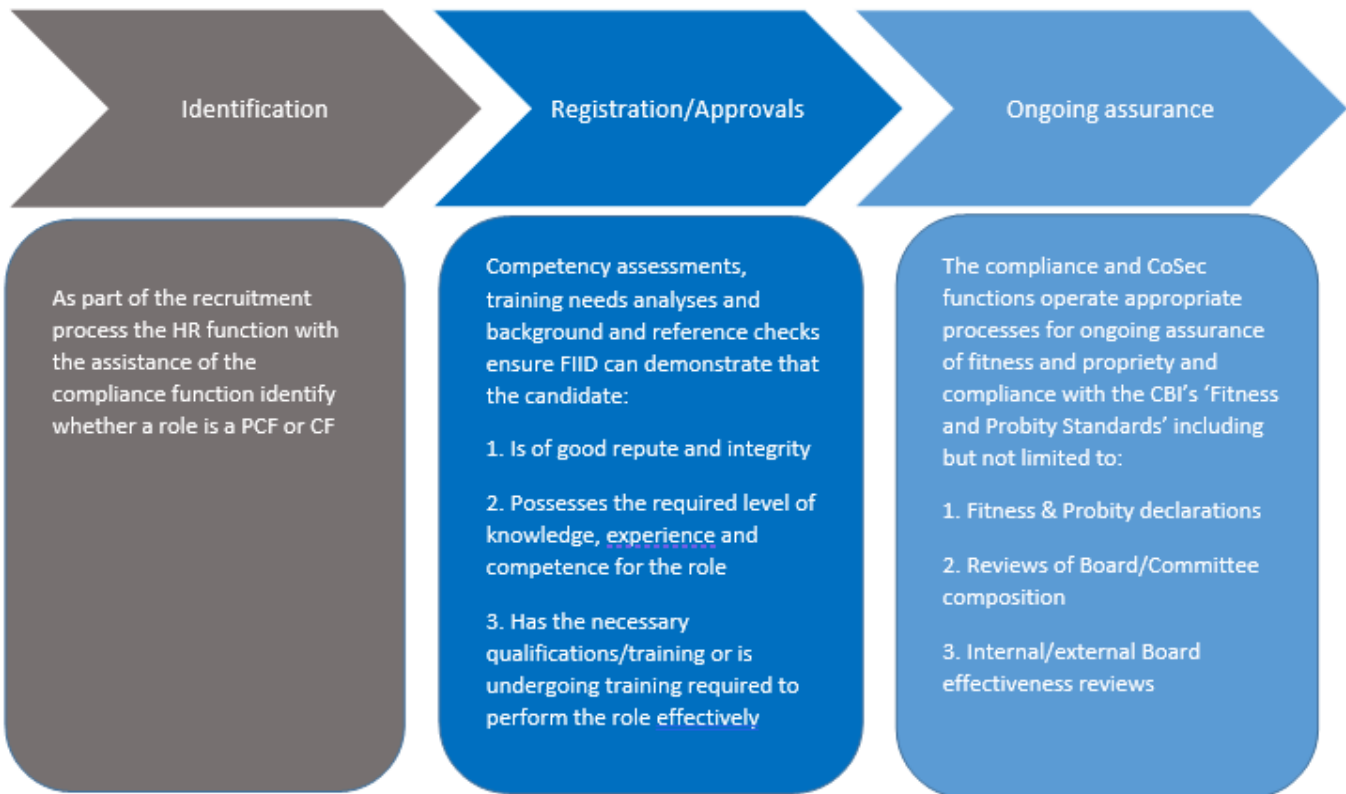
The Company's remuneration policy does not include any supplementary pension or early retirement schemes for members of the Board or other key function holders. The Company offers all staff the choice of making contributions into a defined contribution pension scheme, subject to applicable pension rules. 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's PRSI).

## **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**

The Company has not received capital contributions in 2021 (2020: contribution \$60.0 million). The 2020 capital contributions were approved by the CBI as tier 1 capital.

## B2. FIT AND PROPER REQUIREMENTS

FIID operates Fitness and Probity procedures which governs the recruitment, approvals, induction, training and ongoing assessment of the Fitness and Probity for those individuals performing Controlled Functions (including Pre-Approval Controlled Functions (“PCF”).



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

### B3.1 Risk management system

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

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

- 1) Identification – the risk exposures that could materially impact FIID 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 FIID 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 FIID Board’s approved risk appetite levels.
- 3) Management - where a risk exposure has exceeded the FIID 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 FIID Board on a quarterly basis. Where there has been an exceedance in the FIID 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 FIID is, or could be, exposed. This universe encompasses those intrinsic risks that are fundamental to FIID’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 sub categories of risk into those “core” risks that are actively pursued to optimise FIID’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 FIID 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.

FIID 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 FIID will face are set out below:

Risk Category	Risk Description
Non-life underwriting risk	This risk arises from two sources – adverse claims development (reserve risk), underwriting (premium risk) and man-made catastrophe exposures (catastrophe 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 FIID’s reinsurers
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 FIID 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 FIID 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 FIID 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 FIID Board committees and management.

The Board receives comprehensive risk and capital reporting on at least a quarterly basis and at such other times deemed 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 projections are 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 by the Board.

- **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.

## **iii. Quarterly risk, capital and solvency review**

The risk function 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 an analysis of the risk, 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 FIID's risk appetite.

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

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

Through the performance of the ORSA process and based on the business strategy and plan, FIID 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 FIID's annual business planning process in the last quarter of 2021. It was approved by the FIID Board on 9 December 2021 and a summary of this ORSA Report was subsequently submitted to the CBI within two weeks of the Board approval.

## B4. INTERNAL CONTROL SYSTEM

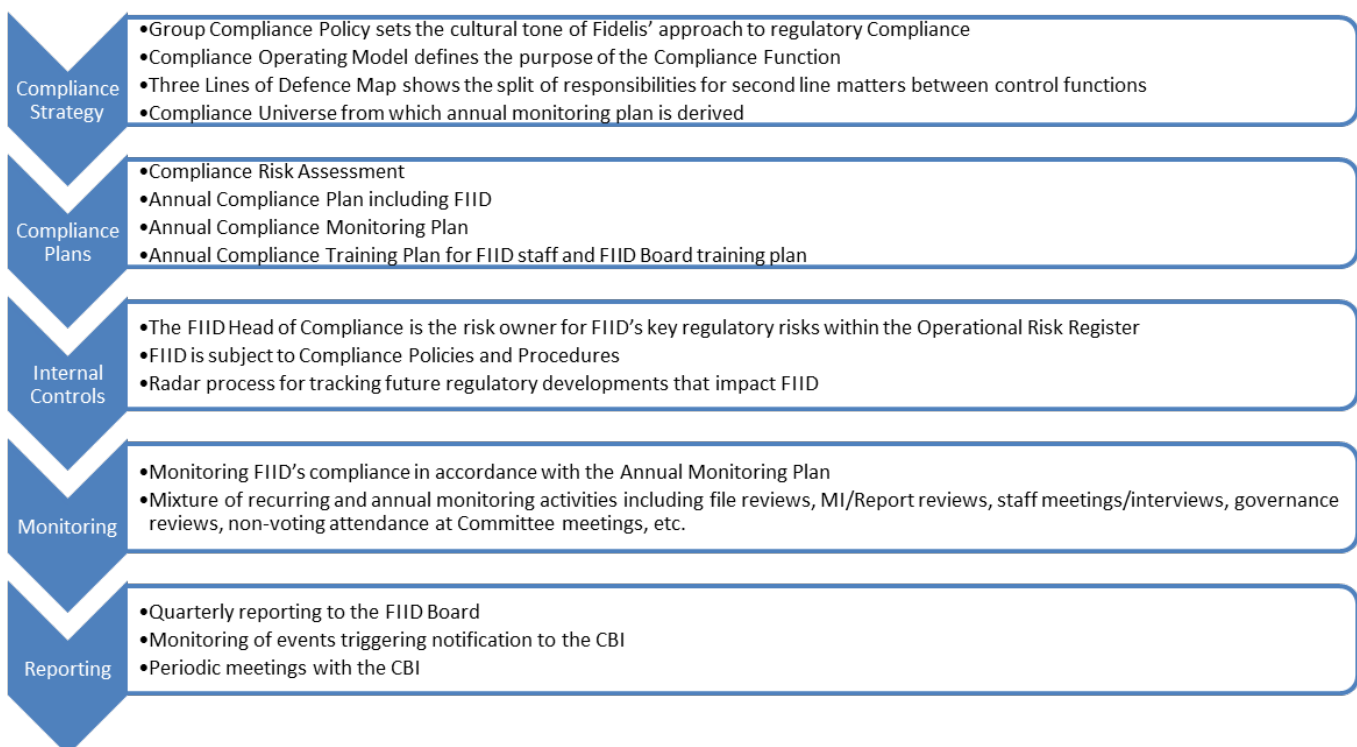
### B4.1 Description of internal control system

Significant internal policies are approved at Group level by the FIHL Board, with subsequent approval by the FIID Board 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 FIID compliance function is led by the FIID Head of Compliance who reports into the FIID CEO. 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 FIID's culture and behaviours put clients' interests at the heart of its business activities and that FIID 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 three staff internal auditors, one based in Dublin, and through a panel of co-source service providers. The Group HIA has drafted and the FIID Audit Committee has approved and recommended to the FIID 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 maintained the audit universe which is presented to the FIID 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 FIID Audit Committee. The Group HIA, using in-house or co-source resource, as agreed by the FIID 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 FIID 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 FIID Board each year, presents an annual audit plan, typically in the fourth quarter, for approval by the FIID 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 FIID 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 FIID 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 FIID 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 FIID Head of Actuarial Function (“HoAF”) is supported by the Group actuarial function, led by the UK Chief Actuary, which 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 technical provisions, opining on the underwriting policy, reinsurance arrangements and calculating the standard formula Solvency Capital Requirements (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 FIID 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 FIID HoAF 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 FIID 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 FIID HoAF role is an approved position and is subject to approval by the CBI.

## **B7. OUTSOURCING**

FIID operates an Outsourcing Policy and Outsourcing Procedure (“Outsourcing Controls”). This applies to any form of agreement between FIID and an external third party, where the latter performs a (re)insurance activity or undertakes a key function on behalf of FIID, which FIID 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. FIID’s continuing compliance with the conditions and obligations of its authorisation;

3. FIID'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:

Prior to executing the arrangement

- Enhanced due diligence
- Minimum contractual requirements
- FIID 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

After executing the agreement

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

FIID currently outsources the following critical functions listed below:

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 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 FIID to have its portfolio independently priced.	Finance
Data Storage	United Kingdom	The Fidelis IT strategy is to seek best-of-breed capability providers across as few external providers as possible. Outsourcing allows scalable Data Storage capabilities.	IT
Solvency II Technical Provisions and other Actuarial Support	United Kingdom	FIID would not currently be able to economically perform the level of Actuarial and Technical work required for calculating, evaluating and monitoring Solvency II Technical Provisions.	Actuarial
Underwriting Systems Support	United Kingdom	The Fidelis IT strategy is to seek best-of-breed 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

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. During the year, the following assessments were performed:

1. An annual review undertaken by the compliance function to ensure that FIID complies with the governance requirements set out in the CBI's Corporate Governance Requirements for Insurance Undertakings (2015). Additionally, an annual compliance statement stating that FIID materially complies with its obligations and requirements under the Corporate Governance Requirements for Insurance Undertakings 2015 was approved by the Board and submitted to the CBI.
2. An annual Board effectiveness review is undertaken, with the results reported to the Board.

## C. RISK PROFILE

### 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 non-life underwriting 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 Underwriting and Marketing Conference Call ("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 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, legal and compliance functions to provide appropriate expertise and challenge. Regular attendance of the FIID CRO provides an additional layer of defence and supports him 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 FIID 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 FIID Board primarily approves the purchase of outwards reinsurance as part of the approval of the business plan. The main reinsurance treaty for FIID is an intra-group reinsurance (“IGR”) quota share treaty with FIBL. FIID can also purchase additional facultative and treaty reinsurance protection as the FIID CEO and FIID CUO deems necessary, on behalf of the Board. The Group also purchases proportional and non-proportional treaty placements for which FIID is a beneficiary, with prior approval and input from the FIID CEO and FIID CUO.

The Company plans to continue to use outwards reinsurance as 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 incurred but not reported (“IBNR”) reserves. These reserves are expected to be less material 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.

FIID’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 with internal and external actuaries.

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

### **iii. Risk assessment of non-life underwriting risk**

#### ***Premium risk***

Elemental (e.g. wind, earthquake) and non-elemental (e.g. terror, financial risk) exposures are monitored when relevant 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.

FIID is primarily exposed to non-elemental exposures, for such exposures, where stochastic modelling capabilities are not available, the process considers a range of RRC approved deterministic Realistic Disaster Scenarios (“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 reserving risk, 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.

### **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.

## **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 investments 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 FIID Board.

FIID contracts with an investment portfolio manager for the provision of investment management services. The Company's investment guidelines and risk, capital and solvency appetite formalise FIID'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 manager which takes into account the Company's risk tolerance levels and investment objectives. All strategic investment decisions are submitted to the FIID Board for approval. Investment decisions are made in line with the Company's investment guidelines and the prudent person principle.

An increase or decrease of 25 basis points ("BPS", a measurement where one BPS is equal to 0.01%), in interest yields would result in additional loss or gain for the year of \$0.5 million (2020: \$0.5 million) with an equal impact on net assets, assuming all other assumptions remain unchanged.

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 million equivalent per currency and mitigation activities must be implemented within 14 days of completion of quarterly 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 FIID's own exposures.

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

### **Asset and liability matching risk**

Asset and liability risk is defined as the risk that the Company either experiences an unexpected loss as a result of a change in interest rates or exchange rates or 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 has been developed to ensure that investment proceeds and returns, and available cash are in excess of obligations under insurance contracts.

### **iii. Risk assessment of non-life market risk**

#### ***Investment Risk***

The aggregate risk level is managed through the adherence to the investment guidelines with a portfolio manager. 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 average credit rating;
- The percentage of the portfolio held in risk assets;
- The percentage of the portfolio held in assets which have a credit rating lower than BBB-;
- 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.

An increase or decrease of 10% in the US dollar would result in additional loss or gain for the year of \$0.6 million (2020: \$1.0 million) with an equal impact on net assets, assuming all other assumptions remain unchanged.

#### ***Currency risk***

FIID assesses its exposure to currency risk through its regular monitoring against the Board agreed risk appetite limits which are reported in the quarterly CRO report to the FIID Board.

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

#### ***Asset and liability matching risk***

FIID assesses its exposure to asset and liability matching risk through its regular monitoring against the Board agreed risk appetite limits which are reported in the quarterly CRO report to the FIID Board.

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

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

### **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 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 assessment 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. Key areas where the Company will be 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

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:

- Appropriate counterparty selection;
- Appropriate levels of diversification in the portfolio;
- Appropriate mitigation in respect of external counterparties with a lower security rating through the use of collateralisation and/or downgrade clauses as appropriate; and
- 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 and monitors the Group's aggregations which are reported to the FIID Board on a quarterly basis in the CRO report. In certain circumstances, deposits from reinsurers are also held as collateral.

#### Intra-group reinsurer counterparty

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

As at the end of 2021 the FIID Board set a minimum level of collateralisation of between 111% and 116% of the sum of a) FIID's reserves for Losses and loss adjustment expenses reported and outstanding and incurred but not reported; and b) FIID'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 FIID Board in the CRO report.

#### Intermediary counterparty risk

FIID 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 FIID is collected and to ensure that cash received is allocated appropriately. Documented credit control meetings, where delinquent accounts are reviewed, are held monthly and include a representative from underwriting, finance, operations and claims. Underwriters 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 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 FIID 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 assessment of liquidity risk**

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

#### **ii. Risk mitigation techniques for liquidity risk**

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. The Company's investment guidelines and risk, capital and solvency appetite formalise FIID'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.

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.

Subject to maintaining sufficient liquidity in aggregate across entities, FIID 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.

The target minimum level of Group 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. FIID 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 as a part of the ORSA process.

The results of the 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 FIID 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 FIID invests in, as well as the custodians, banks, credit institutions and bond issuers that FIID 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 in future net cash flows and therefore can act to 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 technical provisions.

The EPIFP as at 31 December 2021 is \$10.2 million. 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. FIID 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 CRO and/or a member of the risk management function meets with individual risk and control 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 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 FIID'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 risk assessments. 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 FIID Board.

Operational 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 operational risk**

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

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

## **C1.6 Other material risks**

### **Emerging risk**

#### **i. Overview of assessment 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, that have the potential to develop in such a way as to impact the balance sheet.

FIID 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;
- CRO and other members of the risk management function's reviews with risk owners conducted via the operational risk management process;
- CRO attendance at underwriting and investment committees; and
- CRO and other members of the risk management function's reviews 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

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

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

### iv. Risk concentration of emerging risks

Emerging risk concentrations may occur in relation to 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 reinsurance purchase forms include statements regarding matching the period of underwriting the risk and expected availability in 12 months, which must all be explicit at time of purchase of any reinsurance.

The majority of the Group's reinsurance program renews at 1<sup>st</sup> January, however exposures are not all written at the 1<sup>st</sup> January, therefore, if there is a mismatch FIID and the Group are aware of it before the inward exposure is written. Throughout the year, FIID also enters into facultative reinsurance arrangements to manage its exposures in Bespoke and Specialty lines.

##### iii. Risk assessment of reinsurance availability risk

Reinsurance availability risk is assessed as part of each reinsurance placement through the completion of reinsurance purchase forms.

The risk is monitored on a frequent 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 stress and scenario testing undertaken within 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 FIID as part of the SCR as at 31 December 2021 compared to 31 December 2020:

	<u>2021</u>	<u>2020</u>
<b>\$ millions</b>		
Non-life underwriting risk	52.6	34.4
Market risk	4.4	4.0
Counterparty default risk	13.0	7.1
Diversification	(8.5)	(5.8)
BSCR	<u>61.5</u>	<u>39.7</u>
Operational risk	<u>6.8</u>	<u>2.7</u>
SCR	<u><u>68.3</u></u>	<u><u>42.4</u></u>

The FIID 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 a 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.

### C2.2 Investment of assets in accordance with the 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.

FIID fulfills its obligations required by the Solvency II Directive to ensure that its assets are invested in line with the prudent person principle by only investing in 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

A range of sensitivity, stress and scenario tests are conducted as part of the ORSA process in order to test the Company's resilience, inform contingency plans and validate the appropriateness of its regulatory and economic capital and solvency profile. These scenarios were developed by a subcommittee of the Board, comprising the Chair of the RCC, the CEO, the CFO, the Chief Actuary and the CRO. The aim of these tests 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. The tests that were carried out as part of the ORSA process in Q4 2021 included (but were not limited to):

1. Loss Ratio Stress – Due to more challenging underwriting conditions loss experience is materially higher than planned for new business written.
2. MGA Scenarios – A scenario was developed for a selection of key MGA partners, scenarios included including material control failures, reinsurance disputes and large loss aggregations.
3. Optimistic Volumes Scenario - Due to the identification of favourable opportunities within the EEA market, FIID write above plan volumes, and across property and marine classes.
4. Inappropriate TP Assumptions - The underlying assumptions in the technical provisions are revised following a review of their appropriateness, resulting in a material increase in the year-end technical provisions, a material increase in technical provisions unearned claims and a material decrease in expected profit of the unearned technical provisions.
5. Global Economic Recession - Deep global recession impacts credit insurance lines and the investment portfolio.
6. Expense Strain Scenario – Due to an increase in intra-company recharges and additional resourcing needs, actual expenses prove to be significantly more than planned.
7. Natural Catastrophe - Catastrophic European windstorm occurs in resulting in losses across exposed FIID lines.
8. Exhaustion of the Group's specialty aggregate XOL Reinsurance – A series of extreme losses in the marine markets result in the Fidelis Group's aggregate XOL reinsurance protection for specialty being exhausted by losses incurred by other companies in the Fidelis Group. Subsequently there is a full limit loss not covered by the reinsurance.
9. Large Aviation Loss - A large loss event occurs as a result of two airliners crashing in each other, with each aircraft having the maximum aviation hull and line-size cover, FIID provides cover to both Airlines.

Under all of the tests conducted as part of the Q4 2021 ORSA process, the Company maintained its own funds above the SCR and MCR.

### C4. ANY OTHER INFORMATION

#### C4.1 Climate change

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

## **Governance**

FIID 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 FIID Risk and Capital Committee which is a FIID Board sub-committee.
- The legal 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 CBI requirements the FIID 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 actively avoids writing high frequency perils
- Vendor models - Fidelis uses the most up to date catastrophe models
- Prudent model adjustments - Fidelis loads modelling data prudently to reflect exposure at risk
- 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 F 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**

FIID does not have any physical assets that may be directly exposed to climate-related events or changes. The Group head office and FIID's parent company FIBL are located in Bermuda which is subject to hurricanes. The impact of hurricanes impacting the island has been assessed and incorporated into the relevant Business Continuity Plan and Disaster Recovery Plan.

## **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.

### **C4.2 COVID-19**

#### **Operational Impact**

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

### C4.3 UKRAINE/ RUSSIA

On 24 February 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 which resulted in a devaluation of the Rouble and a fall in the value of Russian fixed income and equity assets. The Company had no direct exposure to Russian equities or fixed income assets impacted by sanctions. The Company 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 this is a recent post balance sheet event, and in 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 the Company can reasonably estimate potential losses which potentially could be material. However, the Company does not believe the impact of the Ukraine Conflict will adversely affect the Company's ability to operate as a going concern.

## 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 of assets and liabilities per the Company's financial statements to the valuation for solvency purposes as at 31 December 2021:

\$ millions	Valuation per Irish GAAP	Valuation Adjustments and reclassifications	Valuation per Solvency II
	_____	_____	_____
<b>Assets</b>			
Investments	102.3	0.5	102.8
Cash and cash equivalents	19.3	—	19.3
Insurance and intermediaries receivables	273.8	(262.6)	11.2
Recoverable accrual	10.7	—	10.7
Net Deferred acquisition costs	27.7	(27.7)	—
Reinsurance recoverables	411.1	(426.1)	(15.0)
Deferred tax assets	0.2	(0.2)	—
Any other assets, not elsewhere shown	12.5	(0.5)	12.0
<b>Total assets</b>	<b>857.6</b>	<b>(716.6)</b>	<b>141.0</b>
<b>Liabilities</b>			
Technical provisions	460.8	(457.9)	2.9
Reinsurance premiums payables	237.4	(237.4)	—
Deferred reinsurance commissions	34.3	(34.3)	—
Deferred tax liabilities	—	1.7	1.7
Any other liabilities, not elsewhere shown	19.7	(1.4)	18.3
<b>Total liabilities</b>	<b>752.2</b>	<b>(729.3)</b>	<b>22.9</b>

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

\$ millions	Valuation per Irish GAAP	Valuation Adjustments and reclassifications	Valuation per Solvency II
<b>Assets</b>			
Investments	88.2	0.4	88.6
Cash and cash equivalents	32.9	—	32.9
Insurance and intermediaries receivables	133.1	(130.0)	3.1
Recoverable accrual	1.7	—	1.7
Net Deferred acquisition costs	14.5	(14.5)	—
Reinsurance recoverables	220.7	(224.5)	(3.8)
Deferred tax assets	0.9	—	0.9
Any other assets, not elsewhere shown	5.7	(0.4)	5.3
<b>Total assets</b>	<b>497.7</b>	<b>(369.0)</b>	<b>128.7</b>
<b>Liabilities</b>			
Technical provisions	249.8	(232.6)	17.2
Reinsurance premiums payable	121.7	(121.7)	—
Deferred reinsurance commissions	14.6	(14.6)	—
Any other liabilities, not elsewhere shown	10.9	—	10.9
<b>Total liabilities</b>	<b>397.0</b>	<b>(368.9)</b>	<b>28.1</b>

## D1. ASSETS

### D1.1 Investments

As at 31 December 2021, the Company held \$102.8 million (2020: \$88.6 million) worth of investments, which are carried at fair value under Irish GAAP and Solvency II. The \$0.5 million difference between the Irish GAAP and Solvency II valuation relates to accrued interest, which is included within investments under Solvency II.

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

\$ millions	Level 1	Level 2	Level 3	Total
Government bonds	10.8	5.3	—	16.1
Corporate bonds	—	86.7	—	86.7
<b>Total assets</b>	<b>10.8</b>	<b>92.0</b>	<b>—</b>	<b>102.8</b>



The table below shows the Company's financial assets at fair value by material class of investment as at 31 December 2020:

\$ millions	Level 1	Level 2	Level 3	Total
Government bonds	37.4	2.1	—	39.5
Corporate bonds	—	49.1	—	49.1
<b>Total assets</b>	<b>37.4</b>	<b>51.2</b>	<b>—</b>	<b>88.6</b>

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

- Level 1 - investments are securities with quoted prices in active markets. An active markets 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.
- Level 3 - investments are securities where no active market or other transactions can be used as a good estimate of fair value. FIID did not have any level 3 assets as at 31 December 2021 (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 \$19.3 million (2020: \$32.9 million) as cash and cash equivalents. 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 Irish GAAP.

#### D1.3 Insurance and intermediaries receivables

Insurance and intermediaries receivables represents premiums owed from policyholders. As at 31 December 2021, the Company had a total of \$273.8 million (2020: \$133.1 million) of outstanding premiums per Irish GAAP. For Solvency II purposes, an adjustment is made to remove non-overdue receivables leaving an insurance and intermediaries receivables balance of \$11.2 million (2020: \$3.1 million). The non-overdue receivables balance is considered within the calculation of the technical provisions as they are used as the basis for the future premiums and claims reinsurance recoveries elements.

Under Irish 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 Irish GAAP carrying value represents a fair approximation of the market consistent valuation under Solvency II.

#### D1.4 Deferred acquisition costs

Deferred acquisition costs comprise brokerage and commission incurred on contracts written during the financial year, but expensed over the term of the insurance contract. As at 31 December 2021, deferred acquisition costs totalled \$27.7 million (2020: \$14.5 million) per Irish GAAP. Deferred acquisition costs are removed under Solvency II principles, however future cashflows of unpaid acquisition costs are accounted for within the technical provisions.

### **D1.5 Reinsurance recoverables**

As at 31 December 2021, reinsurance recoverables were \$411.1 million under Irish GAAP (2020: 220.7 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 technical provisions.

### **D1.6 Recoverable accrual**

The recoverable accrual comprises of reinsurance recoverables on paid claims. As at 31 December 2021, the recoverable accrual totalled \$10.7 million (2020: 1.7 million) under Irish GAAP. 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 Irish 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 an Irish GAAP basis, and the values ascribed to the same assets and liabilities for tax purposes. The value of the deferred tax asset per Irish GAAP is \$0.2 million as at 31 December 2021 (2020: \$0.9 million). The adjustment to the deferred tax asset for Solvency II purposes has resulted in the clear down of the deferred tax asset and the recognition of a deferred tax liability at 31 December 2021, there were no material adjustments to the deferred tax asset for Solvency II purposes in 2020.

Deferred tax is measured using rates enacted or substantively enacted at the balance sheet date that are expected to apply to the reversal of a timing difference.

FIID's deferred tax asset has been recognised on the basis that these tax credits are expected to be utilised in future periods, as supported by future profit forecasts.

### **D1.8 Any other assets, not elsewhere shown**

As at 31 December 2021, other assets which primarily comprise intercompany receivables, were \$12.5 million (2020: \$5.7 million) per Irish GAAP and are valued at amortised cost less any impairment which approximates to fair value given the short-term nature of these assets. The difference between the valuations is driven by the re-classification of accrued interest to Investments for Solvency II.

## D2. TECHNICAL PROVISIONS

### D2.1 Value of technical provisions by line of business

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

\$ millions	Direct and accepted proportional business					Accepted non-proportional business		Total
	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability	Credit and suretyship insurance	Miscellaneous financial loss	Marine, aviation and transport	Property	
Premium provisions: Gross	(20.3)	(4.4)	10.0	(60.2)	7.7	(0.3)	—	(67.5)
Premium provisions: Ceded	(4.5)	(2.3)	15.1	(26.5)	1.0	—	(0.2)	(17.4)
<b>Premium provisions: Net</b>	<b>(15.8)</b>	<b>(2.1)</b>	<b>(5.1)</b>	<b>(33.7)</b>	<b>6.7</b>	<b>(0.3)</b>	<b>0.2</b>	<b>(50.1)</b>
Claims provisions: Gross	11.4	1.4	5.2	5.8	29.5	0.5	5.5	59.3
Claims provisions: Ceded	0.3	(1.6)	(7.2)	(4.0)	10.4	(0.1)	4.6	2.4
<b>Claims provisions: Net</b>	<b>11.1</b>	<b>3.0</b>	<b>12.4</b>	<b>9.8</b>	<b>19.1</b>	<b>0.6</b>	<b>0.9</b>	<b>56.9</b>
<b>Risk margin</b>	<b>2.7</b>	<b>1.0</b>	<b>2.5</b>	<b>1.8</b>	<b>2.9</b>	<b>0.1</b>	<b>0.1</b>	<b>11.1</b>
<b>Total technical provisions</b>	<b>(2.0)</b>	<b>1.9</b>	<b>9.8</b>	<b>(22.1)</b>	<b>28.7</b>	<b>0.4</b>	<b>1.2</b>	<b>17.9</b>

#### 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 represents the risk premium that would be required to be paid to a third party in order to take over and meet the insurance and reinsurance obligations over their lifetime. The risk margin is calculated using the Solvency II prescribed approach, as the discounted cost of capital of running off all policies that form part of the best estimate, at a rate of 6% per annum. The risk margin is currently allocated between Solvency II lines of business in line with its insurance premium volume measure within the Standard Formula calculation.

## II. Technical provisions 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 an Irish 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

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. Actual experience is expected to deviate from expectations. The Company's estimates are subject to additional uncertainty due to the high exposure to potential large losses due to the nature of the business written and the number of multi-year deals with large volumes of premium yet to be received.

As part of the technical provision process, a suite of sensitivity tests is run to better understand the materiality of key assumptions and how sensitive the overall best estimate technical provision is to changes in the underlying assumptions.

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

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

\$ millions	Direct and accepted proportional business					Accepted non-proportional business		Total
	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability	Credit and suretyship insurance	Miscellaneous financial loss	Marine, aviation and transport	Property	
Gross Irish GAAP insurance contract liabilities	20.6	9.4	6.5	12.2	12.0	1.8	3.8	66.3
Solvency II adjustments	(29.5)	(12.4)	8.7	(66.6)	25.2	(1.6)	1.7	(74.5)
<b>Gross BEL</b>	<b>(8.9)</b>	<b>(3.0)</b>	<b>15.2</b>	<b>(54.4)</b>	<b>37.2</b>	<b>0.2</b>	<b>5.5</b>	<b>(8.2)</b>
Net Irish GAAP insurance contract liabilities	2.5	0.6	0.8	1.3	1.9	0.2	0.3	7.6
Solvency II adjustments	(7.2)	0.3	6.5	(25.2)	23.9	0.1	0.8	(0.8)
<b>Net BEL</b>	<b>(4.7)</b>	<b>0.9</b>	<b>7.3</b>	<b>(23.9)</b>	<b>25.8</b>	<b>0.3</b>	<b>1.1</b>	<b>6.8</b>
<b>Risk margin</b>	<b>2.7</b>	<b>1.0</b>	<b>2.5</b>	<b>1.8</b>	<b>2.9</b>	<b>0.1</b>	<b>0.1</b>	<b>11.1</b>
<b>Technical provisions</b>	<b>(2.0)</b>	<b>1.9</b>	<b>9.8</b>	<b>(22.1)</b>	<b>28.7</b>	<b>0.4</b>	<b>1.2</b>	<b>17.9</b>

The main differences between the Solvency II and Irish 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).

There is also a reallocation of premium receivable balances under Irish GAAP to technical provisions in the Solvency II balance sheet, only balances within credit terms are reallocated.

## D3. OTHER LIABILITIES

### D3.1 Reinsurance payables

As at 31 December 2021, reinsurance payables were \$237.4 million (2020: \$121.7 million) per Irish 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 Irish GAAP. There are no differences in principle between Solvency II and Irish 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 Deferred reinsurance commissions

As at 31 December 2021, ceded deferred reinsurance commissions totalled \$34.3 million (2020: \$14.6 million) per Irish GAAP. Deferred acquisition costs are removed under Solvency II principles, however future cashflows of unpaid acquisition costs are accounted for within the technical provisions.

### D3.3 Deferred tax 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 an Irish GAAP basis, and the values ascribed to the same assets and liabilities for tax purposes. The adjustment to the deferred tax asset for Solvency II purposes has resulted in the clear down of the Irish GAAP deferred tax asset and the recognition of a deferred tax liability of \$1.7 million at 31 December 2021 for Solvency II purposes, there was no deferred tax liability for Solvency II purposes in 2020.

Deferred tax is measured using rates enacted or substantively enacted at the balance sheet date that are expected to apply to the reversal of a timing difference.

FIID's deferred tax liability has been recognised on the basis that tax charges are expected to be incurred in future periods.

### D3.4 Any other liabilities, not elsewhere shown

As at 31 December 2021, all other payables were \$19.7 million (2020: \$10.9 million) per Irish GAAP and \$18.3 million per Solvency II. The adjustment of (\$1.3) million is a reclass 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 Irish 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 or 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*, and responsibility ultimately rests with FIID's Board. As part of own funds management, the Company prepares ongoing 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 capital requirements and this helps focus actions for future capital management.

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

\$ millions	Tier 1	Tier 2	Tier 3	Total
Called up share capital	1.0	—	—	1.0
Capital contribution	107.0	—	—	107.0
Deferred tax asset	—	—	0.9	0.9
Reconciliation reserve	(8.2)	—	—	(8.2)
<b>Balance as at 31 December 2020</b>	<b>99.8</b>	<b>—</b>	<b>0.9</b>	<b>100.7</b>
Capital contribution	—	—	—	—
Change in deferred tax and reconciliation reserve	18.3	—	(0.9)	17.4
<b>Movement in 2021 own funds</b>	<b>18.3</b>	<b>—</b>	<b>(0.9)</b>	<b>17.4</b>
Called up share capital	1.0	—	—	1.0
Capital contribution	107.0	—	—	107.0
Deferred tax asset	—	—	—	—
Reconciliation reserve	10.1	—	—	10.1
<b>Balance as at 31 December 2021</b>	<b>118.1</b>	<b>—</b>	<b>—</b>	<b>118.1</b>

The Company's ordinary share capital, capital contribution 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 capital contribution are not subordinated and have no restricted duration.

The reconciliation reserve represents the excess of assets over liabilities, less a deduction equal to the share capital and the capital contribution.

The Company has not received capital contributions in 2021 (2020: contribution of \$60.0 million). The 2020 capital contributions were approved by the CBI as tier 1 capital.

FIID benefits from a contractual intragroup guarantee provided by FIHL. Under the terms of the guarantee, FIHL undertakes to satisfy all liabilities of FIID in the event of its insolvency. This provides a degree of protection greater than that required by the Solvency II SCR.

Additionally, FIID entered into a capital maintenance agreement in 2021, which commits FIBL to provide sufficient capital to maintain FIID's regulatory solvency position equivalent to 105% of its Solvency II SCR Coverage Ratio. This agreement includes a clause that the commitment will be triggered if the FIID Board believes that the Solvency II SCR Coverage Ratio will drop below this position at any point over a subsequent nine-month period. FIBL is required to provide the funds within 15 Business Days of receipt of a valid demand from FIID under the agreement. Any funds provided under the agreement must be of a form that they can be used to meet FIID's solvency capital requirements.

Tier 1 own funds are eligible to meet both the SCR and the MCR and are permanently available to cover losses. The deferred tax asset is included in tier 3 capital. This category of own funds can be used to cover the SCR (up to a maximum 15%) but is not eligible to cover the MCR.

When considering the loss absorbing capacity of deferred tax in the SCR, it is possible to recognise the tax asset against:

- Deferred tax liabilities on the Solvency II balance sheet;
- Future taxable profits; or
- Prior year profits (carry back).

As at 31 December 2021, no loss absorbing capacity of deferred tax has been recognised in the SCR.

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

<b>\$ millions</b>	<u><b>2021</b></u>	<u><b>2020</b></u>
Total Irish GAAP equity	105.4	100.7
Valuation adjustments relating to technical provisions	14.5	(0.1)
Deferred tax effect	(1.8)	—
<b>Total basic own funds</b>	<u><b>118.1</b></u>	<u><b>100.6</b></u>

Solvency II own funds of \$118.1 million is more than capital calculated on an Irish GAAP basis, driven by the movement in TPs, risk margin and additional expenses in running off technical provisions. This is partially offset by profits in the unearned premium reserve and the impact of deferred tax.

## **E2. SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT**

### **E2.1 SCR and MCR as at 31 December 2021 compared to 31 December 2020:**

<b>\$ millions</b>	<u><b>2021</b></u>	<u><b>2020</b></u>
SCR	68.3	42.4
MCR	17.1	10.6

The SCR, calculated using the Standard Formula, is intended to be calibrated to ensure all quantifiable risks to which the entity is exposed are captured, covering all existing business and all the business planned to be written over the next twelve months. This means that the 2022 planned premiums and exposures are taken into account in the Q4 2021 SCR calculation.

### **E2.2 SCR split by risk module**

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



\$ millions	2021	2020
Non-life underwriting risk	52.6	34.4
Market risk	4.4	4.0
Counterparty default risk	13.0	7.1
Diversification	(8.5)	(5.8)
<b>BSCR</b>	<b>61.5</b>	<b>39.7</b>
Operational risk	6.8	2.7
<b>SCR</b>	<b>68.3</b>	<b>42.4</b>

Non-life underwriting risk is the largest component of FIID's SCR and is primarily driven by EU man-made catastrophe risk.

### 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 technical provisions 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:

\$ millions	2021	2020
Absolute floor	2.9	2.9
SCR	68.3	42.4
Combined MCR	17.1	10.6
<b>MCR</b>	<b>17.1</b>	<b>10.6</b>

### 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 FIID.

### 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 period. 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
- BEL** – Best Estimate Liabilities
- BMA** - Bermuda Monetary Authority
- BSCR** – Basic Solvency Capital Requirement
- CBI** – Central Bank of Ireland
- CEO** – Chief Executive Officer
- CFO** – Chief Finance Officer
- CHRO** – Chief Human Resources Officer
- CIO** – Chief Investment Officer
- 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
- ERM** – Enterprise Risk Management
- ESG** - Environmental, Social and Governance
- HIA** – Head of Internal Audit
- HoAF** - Head of Actuarial Function
- IBNR** – Incurred but not Reported
- IELR** – Initial Expected Loss Ratio
- IGR** – Intra-Group Reinsurance
- IIA** – Institute of Internal Auditors
- INED** – Independent non-executive Director
- Irish GAAP** – Irish Generally Accepted Accounting Practice
- LOC** – Letter of Credit
- LTIP** – Long-term Incentive Plan
- MCR** – Minimum Capital Requirement
- MGA** – Managing General Agents
- 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
- QRT** – Quantitative Reporting Template
- RCC** – Risk & Capital Committee, a committee of the FIID Board

**RDS** – Realistic Disaster Scenario

**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 & Return Committee, a management committee

**RSU** – Restricted Stock Unit

**SCR** – Solvency Capital Requirement

TP - Technical Provisions

**ULAE** – Unallocated Loss Adjustment Expenses

**UMCC** – Underwriting Marketing Conference Calls

## B. QUANTITATIVE REPORTING TEMPLATES (“QRTs”)

The following QRTs are required for the SFCR:

<b>QRT Ref</b>	<b>QRT Template name</b>
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)**

		<b>Solvency II value</b>
		C0010
<b>Assets</b>		
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	-
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	102,793
R0080	<i>Property (other than for own use)</i>	-
R0090	<i>Holdings in related undertakings, including participations</i>	-
R0100	<i>Equities</i>	-
R0110	<i>Equities - listed</i>	
R0120	<i>Equities - unlisted</i>	
R0130	<i>Bonds</i>	101,587
R0140	<i>Government Bonds</i>	16,155
R0150	<i>Corporate Bonds</i>	85,432
R0160	<i>Structured notes</i>	-
R0170	<i>Collateralised securities</i>	-
R0180	<i>Collective Investments Undertakings</i>	1,206
R0190	<i>Derivatives</i>	
R0200	<i>Deposits other than cash equivalents</i>	-
R0210	<i>Other investments</i>	-
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	-
R0240	<i>Loans on policies</i>	-
R0250	<i>Loans and mortgages to individuals</i>	
R0260	<i>Other loans and mortgages</i>	
R0270	Reinsurance recoverables from:	(14,956)
R0280	<i>Non-life and health similar to non-life</i>	(14,956)
R0290	<i>Non-life excluding health</i>	(14,956)
R0300	<i>Health similar to non-life</i>	-
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	-
R0320	<i>Health similar to life</i>	
R0330	<i>Life excluding health and index-linked and unit-linked</i>	
R0340	<i>Life index-linked and unit-linked</i>	
R0350	Deposits to cedants	-
R0360	Insurance and intermediaries receivables	11,225
R0370	Reinsurance receivables	10,732
R0380	Receivables (trade, not insurance)	-
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	-
R0410	Cash and cash equivalents	19,254
R0420	Any other assets, not elsewhere shown	11,972
R0500	<b>Total assets</b>	<b>141,021</b>

**S.02.01.02****Balance sheet - (in \$ thousands)**

		<b>Solvency II value</b>
		C0010
<b>Liabilities</b>		
R0510	Technical provisions - non-life	2,905
R0520	<i>Technical provisions - non-life (excluding health)</i>	2,905
R0530	<i>TP calculated as a whole</i>	-
R0540	<i>Best Estimate</i>	(8,162)
R0550	<i>Risk margin</i>	11,067
R0560	<i>Technical provisions - health (similar to non-life)</i>	-
R0570	<i>TP calculated as a whole</i>	-
R0580	<i>Best Estimate</i>	-
R0590	<i>Risk margin</i>	-
R0600	Technical provisions - life (excluding index-linked and unit-linked)	-
R0610	<i>Technical provisions - health (similar to life)</i>	-
R0620	<i>TP calculated as a whole</i>	
R0630	<i>Best Estimate</i>	
R0640	<i>Risk margin</i>	
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	-
R0660	<i>TP calculated as a whole</i>	
R0670	<i>Best Estimate</i>	
R0680	<i>Risk margin</i>	
R0690	Technical provisions - index-linked and unit-linked	-
R0700	<i>TP calculated as a whole</i>	
R0710	<i>Best Estimate</i>	
R0720	<i>Risk margin</i>	
R0740	Contingent liabilities	-
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	1,659
R0790	Derivatives	
R0800	Debts owed to credit institutions	-
R0810	Financial liabilities other than debts owed to credit institutions	-
R0820	Insurance & intermediaries payables	
R0830	Reinsurance payables	
R0840	Payables (trade, not insurance)	
R0850	Subordinated liabilities	-
R0860	<i>Subordinated liabilities not in BOF</i>	
R0870	<i>Subordinated liabilities in BOF</i>	-
R0880	Any other liabilities, not elsewhere shown	18,355
R0900	<b>Total liabilities</b>	<b>22,919</b>
R1000	<b>Excess of assets over liabilities</b>	<b>118,101</b>







S.17.01.02

Non-Life Technical Provisions - (in \$ thousands)

		Direct business and accepted proportional reinsurance					Accepted non-proportional reinsurance			Total Non-Life obligation
		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	
		C0070	C0080	C0090	C0100	C0130	C0150	C0160	C0170	C0180
R0010	Technical provisions calculated as a whole									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
<b>Technical provisions calculated as a sum of BE and RM</b>										
<b>Best estimate</b>										
<b>Premium provisions</b>										
R0060	Gross	(20,295)	(4,463)	10,038	(60,223)	7,676		(280)	14	(67,532)
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	(4,509)	(2,311)	15,166	(26,544)	946	0	26	(162)	(17,389)
R0150	<b>Net Best Estimate of Premium Provisions</b>	<b>(15,786)</b>	<b>(2,151)</b>	<b>(5,128)</b>	<b>(33,679)</b>	<b>6,730</b>	<b>0</b>	<b>(305)</b>	<b>176</b>	<b>(50,143)</b>
<b>Claims provisions</b>										
R0160	Gross	11,350	1,455	5,224	5,839	29,476		522	5,505	59,370
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	239	(1,595)	(7,197)	(4,027)	10,380	120	(69)	4,581	2,433
R0250	<b>Net Best Estimate of Claims Provisions</b>	<b>11,111</b>	<b>3,050</b>	<b>12,421</b>	<b>9,865</b>	<b>19,095</b>	<b>(120)</b>	<b>591</b>	<b>924</b>	<b>56,937</b>
R0260	<b>Total best estimate - gross</b>	<b>(8,945)</b>	<b>(3,008)</b>	<b>15,262</b>	<b>(54,384)</b>	<b>37,152</b>	<b>0</b>	<b>242</b>	<b>5,519</b>	<b>(8,162)</b>
R0270	<b>Total best estimate - net</b>	<b>(4,675)</b>	<b>899</b>	<b>7,293</b>	<b>(23,814)</b>	<b>25,825</b>	<b>(120)</b>	<b>285</b>	<b>1,101</b>	<b>6,794</b>
R0280	<b>Risk margin</b>	<b>2,743</b>	<b>962</b>	<b>2,460</b>	<b>1,835</b>	<b>2,878</b>	<b>2</b>	<b>98</b>	<b>90</b>	<b>11,067</b>
<b>Amount of the transitional on Technical Provisions</b>										
R0290	Technical Provisions calculated as a whole									0
R0300	Best estimate									0
R0310	Risk margin									0
R0320	<b>Technical provisions - total</b>	<b>(6,202)</b>	<b>(2,046)</b>	<b>17,722</b>	<b>(52,549)</b>	<b>40,030</b>	<b>2</b>	<b>340</b>	<b>5,609</b>	<b>2,905</b>
R0330	<b>Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total</b>	<b>(4,270)</b>	<b>(3,907)</b>	<b>7,970</b>	<b>(30,570)</b>	<b>11,326</b>	<b>120</b>	<b>(43)</b>	<b>4,419</b>	<b>(14,956)</b>
R0340	<b>Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total</b>	<b>(1,932)</b>	<b>1,861</b>	<b>9,753</b>	<b>(21,979)</b>	<b>28,703</b>	<b>(118)</b>	<b>383</b>	<b>1,191</b>	<b>17,861</b>

S.19.01.21

Non-Life insurance claims - (in \$ thousands)

Total Non-life business

Z0020 Accident year / underwriting year

		Development year										C0170 In Current year	C0180 Sum of years (cumulative)	
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100			C0110
Year		0	1	2	3	4	5	6	7	8	9	10 & +		
R0100	Prior											0	0	
R0160	N-9	0	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	0
R0180	N-7	0	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	0	0	0	0	1	17						17	19
R0210	N-4	0	0	14	234	35							35	283
R0220	N-3	0	7	2,197	2,626								2,626	4,829
R0230	N-2	8	813	3,220									3,220	4,041
R0240	N-1	1,204	9,492										9,492	10,696
R0250	N	1,523											1,523	1,523
R0260													<b>Total</b> 16,914	21,391

S.19.01.21

Non-Life insurance claims - (in \$ thousands)

Total Non-life business

Z0020 Accident year / underwriting year

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 (discounted data)
		0	1	2	3	4	5	6	7	8	9	10 & +	
R0100	Prior												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
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	0	0	0	3,869	2,686	1,381						1,359
R0210	N-4	0	0	8,585	3,659	1,766							1,716
R0220	N-3	0	(235)	3,420	125								(135)
R0230	N-2	2,120	16,594	21,356									21,273
R0240	N-1	2,162	11,628										11,504
R0250	N	23,860											23,653
R0260													<b>Total</b> 59,370



**S.23.01.01****Own Funds - (in \$ thousands)****Available and eligible own funds**

R0500	Total available own funds to meet the SCR	118,101	118,101	0	0	0
R0510	Total available own funds to meet the MCR	118,101	118,101	0	0	
R0540	Total eligible own funds to meet the SCR	118,101	118,101	0	0	0
R0550	Total eligible own funds to meet the MCR	118,101	118,101	0	0	

R0580	<b>SCR</b>	68,311
R0600	<b>MCR</b>	17,078
R0620	<b>Ratio of Eligible own funds to SCR</b>	172.9%
R0640	<b>Ratio of Eligible own funds to MCR</b>	691.6%

**Reconciliation reserve**

R0700	Excess of assets over liabilities	118,101
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	
R0730	Other basic own fund items	108,000
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	
R0760	<b>Reconciliation reserve</b>	10,101

**C0060****Expected profits**

R0770	Expected profits included in future premiums (EPIFP) - Life business	
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	10,240
R0790	<b>Total Expected profits included in future premiums (EPIFP)</b>	10,240

**S.25.01.21**

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

	<b>Gross solvency capital requirement</b>	<b>USP</b>	<b>Simplifications</b>
	C0110	C0090	C0120
R0010 Market risk	4,426		
R0020 Counterparty default risk	13,017		
R0030 Life underwriting risk	0		
R0040 Health underwriting risk	0		
R0050 Non-life underwriting risk	52,608		
R0060 Diversification	(8,515)		
R0070 Intangible asset risk	0		
<b>R0100 Basic Solvency Capital Requirement</b>	<b>61,536</b>		

**Calculation of Solvency Capital Requirement**

	C0100
R0130 Operational risk	6,775
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
<b>R0200 Solvency Capital Requirement excluding capital add-on</b>	<b>68,311</b>
R0210 Capital add-ons already set	0
<b>R0220 Solvency capital requirement</b>	<b>68,311</b>

**Other information on SCR**

R0400 Capital requirement for duration-based equity risk sub-modu	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

**S.28.01.01**

**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<sub>NL</sub> Result 10,644

Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
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R0070 Marine, aviation and transport insurance and proportional reinsurance  
 R0080 Fire and other damage to property insurance and proportional reinsurance  
 R0090 General liability insurance and proportional reinsurance  
 R0100 Credit and suretyship insurance and proportional reinsurance  
 R0130 Miscellaneous financial loss insurance and proportional reinsurance  
 R0160 Non-proportional marine, aviation and transport reinsurance  
 R0170 Non-proportional property reinsurance

C0020	C0030
0	12,358
899	4,137
7,293	6,746
0	7,327
25,825	8,123
285	26
1,101	

**Linear formula component for life insurance and reinsurance obligations** C0040

R0200 MCR<sub>L</sub> Result 0

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

C0050	C0060

**Overall MCR calculation**

R0300 Linear MCR 10,644  
 R0310 SCR 68,311  
 R0320 MCR cap 30,740  
 R0330 MCR floor 17,078  
 R0340 Combined MCR 17,078  
 R0350 Absolute floor of the MCR 2,911  
 R0400 **Minimum Capital Requirement** 17,078

C0070

10,644
68,311
30,740
17,078
17,078
2,911
17,078