# Partner Re

# Solvency and Financial Condition Report 2021



PartnerRe Ireland Insurance dac

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#### **SUMMARY**

This report provides the reader with information on the business and performance, system of governance, risk profile, valuation for solvency purposes and capital management of PartnerRe Ireland Insurance dac (the Company or PRIIdac) for the year ended 31 December 2021.

The Company is an Irish based multi-class insurance company capable of writing worldwide risks with multi-national access. The Company is a fully owned subsidiary of the PartnerRe Group (the Group), the parent company of the Group is PartnerRe Ltd. (the Group parent), a company incorporated in Bermuda. The ultimate parent company is Exor N.V. (EXOR), a Dutch public limited liability company (Naamloze Vennootschap).

The Company is a designated activity company, incorporated and domiciled in Ireland. The registered office is located at 3rd Floor, The Exchange, George's Dock, IFSC, Dublin 1, Ireland.

The Company is incorporated under the laws of Ireland and is subject to regulation by the Central Bank of Ireland (CBI) under, inter alia, the European Union (Insurance and Reinsurance) Regulations 2015.

The Company made a pre-tax loss of €0.4m (2020: profit €14.1m). This is comprised of an underwriting profit of €7.2m (2020: profit €19.7m), net investment loss and related expenses of €0.4m (2020: gain €3.1m), administrative expenses of €8.2m (2020: €6.7m) and a net foreign exchange gain of €0.9m (2020: loss €2.1m).

See sections A.2., A.3. and A.4. for a discussion of the performance of the Company during the year.

The COVID-19 pandemic and the related economic impact is ongoing, and there continues to be significant uncertainty surrounding the full extent of the impact. For example, a longer or more severe recession could increase the probability of losses. There are also potential legislative, regulatory and judicial actions that create significant uncertainty with respect to policy coverage and other issues. The Company continues to actively monitor information received from or reported by clients, brokers, industry actuaries, regulators, courts and other policymakers, and to assess that information in the context of our own portfolio.

For the year ended 31 December 2021, there was no material change in the Company's COVID-19 ultimate loss estimates.

As the Russia/Ukraine conflict continues, our statement of financial position and profit or loss and other comprehensive income, including the performance of our investment portfolio and our insurance loss ratios, could be negatively impacted due to increased global conflict, terrorism and military actions, heightened security measures and sanctions or other restrictive actions resulting from such events, and perceived risks associated with such developments. Such threats may cause volatility in global markets and financial systems generally, which could harm our business, assets and results of operations. Such risks, including those relating to the current conflict between Russia and Ukraine, may adversely affect our business and financial performance, including by negatively impacting assets in our investment portfolio and increasing our insurance claims exposure.

Section B of this report outlines the Company's system of governance which includes: the role of the Board of Directors (the Board) and the Board Committees, delegation of roles and responsibilities, fit and proper requirements, risk management system, internal control system, Actuarial function, Internal Audit function and use of outsourcing.

The core of the Company's business model is the assumption and management of risk, which is described in further detail in Section C of this report. The Company is exposed to underwriting, market, credit, liquidity and operational risks. The Company has implemented a comprehensive risk management framework to monitor, manage and mitigate these risks. The most important risk management and mitigation tools of the Company are underwriting and investment guidelines, risk limits, diversification and the use of reinsurance with third parties and affiliate companies.

The Company had total Own Funds of €115.5 million in its Solvency II balance sheet at 31 December 2021 (2020: €112.1 million). The assets and liabilities in the Solvency II balance sheet were valued using Solvency II valuation rules. The Solvency II valuation rules are different, in some areas, than those used in the Company's IFRS financial statements, with the valuation of Technical Provisions (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 with IFRS. There were no significant changes to the valuation basis of the Company's assets and liabilities during the year.

The Company's Solvency II Own Funds were as follows as at 31 December 2021 and 2020:

	2021	2020
	€'000	€'000
Ordinary share capital	2,249	2,249
Reconciliation reserve	(39)	(3,525)
Net deferred tax assets	1,798	1,896
Other own funds approved by the supervisory authority	111,463	111,463
Total Solvency II Own Funds	115,471	112,083

All of the Company's Solvency II Own Funds, except for net deferred tax assets, are classified as Tier 1 - unrestricted funds and are fully available to cover the Minimum Capital Requirement (MCR) and Solvency Capital Requirement (SCR). Deferred tax assets are classified as Tier 3 capital which means that they are not available to cover the MCR. See section E for further details on the Company's Solvency II Own Funds as well as the objectives, policies and processes for managing capital and a reconciliation of Solvency II Own Funds to IFRS net equity. There have been no material changes in the Company's capital management objectives, policies and processes during the year.

The Company uses the Standard Formula to calculate the SCR. The Company's MCR, SCR, Solvency II Own Funds and Ratio of Eligible Own Funds to SCR were as follows as at 31 December 2021 and 2020:

	2021	2020
	€'000	€'000
MCR	13,537	11,880
SCR	54,149	47,518
Solvency II Own Funds	115,471	112,083
Ratio of Eligible Own Funds to SCR	213%	236%

# A. BUSINESS AND PERFORMANCE

#### A.1. BUSINESS

PartnerRe Ireland Insurance dac ("the Company") is a designated activity company limited by shares, incorporated and domiciled in Ireland. The Company, through its head office and UK Branch, is a multi-class insurance company capable of writing worldwide risks with multi-national access. The Company underwrites non-life insurance and facultative reinsurance business within its main lines of business: aviation, energy, property and casualty, as well as some credit.

The Company's business strategy is to support PartnerRe's overall strategy by providing clients the option to place business classified as insurance with PartnerRe. The Company is not actively pursuing an independent growth strategy of its insurance business in line with the Group's overall commitment to being a pure-play reinsurer who does not compete with its insurance clients. The Company focuses on sophisticated insurance buyers such as large corporations and multi-nationals who need to place large sums insured, multi-location business or complex risks, typically as co-insurance. The Company does not underwrite retail insurance business.

The Company ceased writing Space Direct & Facultative (D&F) business in 2021 due to a change in strategy. Space D&F was not a significant part of the Company's portfolio.

At the end of 2018, the Company ceased binding business in its U.K. Branch.

The Company has entered the U.K. Temporary Permission Regime ("TPR") which secured the Company's right to continue to trade within the U.K. and access the U.K. (re)insurance market until the end of 2023.

Since 1 January 2021, the U.K. Branch is subject to U.K. specific regulations as a result of U.K.'s departure from the E.U. These regulations are in addition to existing CBI requirements. These regulatory requirements will increase over the course of 2022 and will require the Company to file regulatory returns for its U.K. operations and business with the Prudential Regulatory Authority. To date, the Company has established a U.K. Branch Oversight Committee and adopted Branch-level policies to satisfy these U.K. requirements.

Management expects to make an application for full authorisation of the Company's U.K. branch during 2022. This will ensure access to the U.K. insurance market when the Temporary Permission Regime ceases.

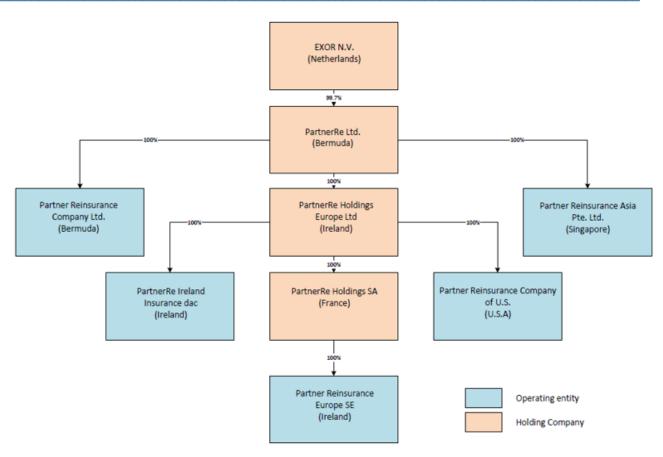
The Company is regulated by the CBI, New Wapping Street, North Wall Quay, Dublin 1, Ireland.

The Company's external auditor is EY, Chartered Accountants and Statutory Audit Firm, EY Building, Harcourt Centre, Harcourt Street, Dublin 2, Ireland.

The Company is a member of the PartnerRe group. The parent company of the PartnerRe group is PartnerRe Ltd. ("group parent"), a company incorporated in Bermuda. The immediate parent company is PartnerRe Holdings Europe Limited ("PRHEL"), a company incorporated in Ireland. The ultimate parent company is Exor N.V. ("EXOR"), a Dutch public limited liability company (Naamloze Vennootschap (N.V.)).

The PartnerRe group is regulated by the Bermuda Monetary Authority, BMA House, 43 Victoria Street, Hamilton, Bermuda.

The following diagram is a simplified Group structure and includes the material related reinsurance and insurance entities in the Group:



Group companies are located in various jurisdictions, principally in Bermuda, U.S., Switzerland, France, Singapore and Ireland, and provide services (including inter alia, Human Resources, Investment Management, I.T. and Claims) to various operating companies within the Group, including the Company.

On 16 December 2021, EXOR announced that it had signed a definitive agreement with Covéa Cooperations S.A. (Covéa) under which Covéa will acquire PartnerRe Ltd.'s, (the ultimate parent company of PartnerRe Ireland Insurance dac) common shares (the "Covéa Acquisition"). The consummation of the Covéa Acquisition is expected in mid-2022 and is subject to customary closing conditions, including antitrust, regulatory and other approvals. It is not expected that the Company will be significantly impacted by the acquisition.

Approximately 96% of the Company's business is written in the United States, the United Kingdom, Germany, Australia and Canada, and consist of 1) Marine, Aviation and Transport, 2) Fire and Other Damage to Property, 3) General Liability and 4) Credit and Suretyship lines of business. Further details can be seen in section A.2. Underwriting performance.

#### A.2. UNDERWRITING PERFORMANCE

The tables below outline the Company's underwriting performance, as per the Company's financial statements, by Solvency II lines of business for 2021 and 2020:

	Marine, aviation and transport	Fire and other damage to property	General liability	Credit and suretyship	Total
2021	€'000	€'000	€'000	€'000	€'000
Gross premium written	20,312	91,458	177,522	208	289,500
Net premium written	1,745	9,498	17,308	31	28,582
Net premium earned	1,985	9,085	10,438	35	21,543
Net claims incurred	(3,242)	(10,416)	(7,230)	3	(20,885)
Net acquisition income/ (expense)	1,059	4,120	1,338	14	6,531
Technical result	(198)	2,789	4,546	52	7,189
Administration expenses	(753)	(3,447)	(3,961)	(13)	(8,174)
Investment expenses	(19)	(85)	(98)		(202)
Total underwriting result	(970)	(743)	487	39	(1,187)

	Marine, aviation and transport	Fire and other damage to property	General liability	Credit and suretyship	Total
2020	€'000	€'000	€'000	€'000	€'000
Gross premium written	18,494	66,336	88,614	328	173,772
Net premium written	1,792	8,740	10,707	49	21,288
Net premium earned	2,636	7,706	9,145	43	19,530
Net claims incurred	(2,164)	(1,735)	(2,510)	(36)	(6,445)
Net acquisition income/ (expense)	1,520	3,123	1,997	20	6,660
Technical result	1,992	9,094	8,632	27	19,745
Administrative expenses	(901)	(2,632)	(3,125)	(14)	(6,672)
Investment expenses	(38)	(112)	(133)	(2)	(285)
Total underwriting result	1,053	6,350	5,374	11	12,788

The presentation of the above tables is in line with Quantitative Reporting Template (QRT) S.05.01.02 which is included in the annex to this report. Refer to this QRT for a further breakdown by the above lines of business. The marine, aviation and transport line of business includes marine, aviation and energy offshore exposures. The fire and other damage to property line of business includes exposures from property, engineering and energy onshore risks. The general liability line of business includes exposures from casualty risks. The credit and suretyship line of business includes exposures from credit & surety risks.

# Marine, aviation and transport

Gross premiums written for the year ended 2021 were €20.3m, this represents an increase of €1.8m when compared to the year ended 2020. The increase reflects premium increases in aviation following the economic downturn in 2020, partially offset by the continued run-off of energy offshore business.

Net premiums earned for the year ended 2021 were €2.0m, representing a reduction of €0.6m year-on-year. This reduction was mainly driven by an increase in space premiums ceded to third parties in 2021.

The underwriting result was a loss of €1.0 million for the year ended 2021. This represents a decrease of €2.0m when compared to prior year. The decrease in the result was driven by the reduction in net premiums in 2021, as well as an increase in the net claims ratio driven by a large space loss in 2021.

# Fire and other damage to property

Gross premiums written for the year ended 2021 were €91.5m, representing an increase of €25.2m when compared to the year ended 2020. This increase was mainly driven by new business and premium increases in property and energy onshore lines of business.

Net premiums earned for the year ended 2021 were €9.1m, this represents an increase of €1.4m compared to prior year. This increase was also mainly driven by new business and premium increases in property and energy onshore lines of business.

The underwriting result was a loss of €0.7m for the year ended 2021. Year-on-year this represents a decrease of €7.1m, driven mainly by an increase in the net claims ratio due to a number of large loss events in property and energy onshore in 2021, compared to relatively few large loss events in 2020.

# **General Liability**

Gross premiums written for the year ended 2021 were €177.5m, representing an increase of €88.9m when compared to the year ended 2020, driven by an increase in MGA business.

Net premiums earned for the year ended 2021 were €10.4m, this represents an increase of €1.3m when compared to prior year driven by the increase in MGA premiums mentioned above.

The underwriting result was €0.5m for the year ended 2021. Year-on-year this represents a decrease of €4.9m, driven by an increase in the claims ratio due to the release of Wholesale loss reserves and the recognition of a one-off deferred gain in relation to the Wholesale business transfer in 2020.

# **Credit and Suretyship**

Gross premiums written for the year ended 2021 were €0.2m. The Company entered into an insurance arrangement with a third party who wrote a small amount of credit business during 2018, 2019, 2020 and 2021.

#### **Expenses Incurred**

Administration, overhead and investment expenses are allocated across the different lines of business on the basis of gross earned premium.

Net acquisition income/expenses was a positive €6.5m compared to €6.7m in 2020 with an overall increase in the acquisition cost ratio driven by a reduction in the overrider commission percentage received on the quota share with Partner Reinsurance Europe SE (PRESE).

Operating expenses increased in 2021 by €1.5m, with the increase mainly due to higher expenses recharged from related entities for personnel costs, overheads and IT costs.

# **Geographical Analysis**

		Top 5 countries by location of insured						
2021	Ireland	United States	United Kingdom	Germany	Australia	Canada	Other	Total
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Gross premium written	244	230,863	30,688	6,130	5,633	3,468	12,474	289,500
Net premium written	25	22,871	2,972	557	584	352	1,221	28,582
Net premium earned	17	15,262	3,179	597	603	424	1,461	21,543
Net claims incurred	(19)	(14,731)	(2,576)	(402)	(903)	(139)	(2,115)	(20,885)
Net acquisition income/(expense)	7	4,570	476	308	267	199	704	6,531
Technical result	5	5,101	1,079	503	(33)	484	50	7,189
Administrative expenses	(6)	(5,792)	(1,206)	(227)	(229)	(161)	(553)	(8,174)
Investment expenses	_	(143)	(30)	(6)	(6)	(4)	(13)	(202)
Total underwriting result	(1)	(834)	(157)	270	(268)	319	(516)	(1,187)

		Top 5 countries by location of insured						
2020	Ireland	United States	United Kingdom	Germany	Australia	Canada	Other	Total
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Gross premium written	174	114,295	32,063	4,963	3,986	3,854	14,437	173,772
Net premium written	19	14,252	3,804	500	522	483	1,708	21,288
Net premium earned	24	12,609	3,518	446	448	384	2,101	19,530
Net claims incurred	(52)	(893)	359	(222)	(145)	(126)	(5,366)	(6,445)
Net acquisition income/(expense)	699	3,732	643	278	183	169	956	6,660
Technical result	671	15,448	4,520	502	486	427	(2,309)	19,745
Administrative expenses	(8)	(4,308)	(1,202)	(152)	(153)	(131)	(718)	(6,672)
Investment expenses	_	(184)	(51)	(6)	(7)	(6)	(31)	(285)
Total underwriting result	663	10,956	3,267	344	326	290	(3,058)	12,788

The presentation of the above tables is in line with QRT S.05.02.01 which is included in the annex to this report. The significant increase in relation to the United States is driven by the increases in General Liability and Fire and Other Damage to Property which are discussed above.

Given the nature of the commercial insurance business, where the location of the insured is not representative of the location of the risk, the Company does not manage its underwriting result by geography.

# **A.3. INVESTMENT PERFORMANCE**

The following table outlines the investment income and expenses for 2021 and 2020:

	2021	2020
	€'000	€'000
Interest income	2,145	1,263
Net realised gains	307	914
Net unrealised (losses)/gains	(2,632)	1,193
Investment management and other related expenses	(202)	(284)
Total net of expenses	(382)	3,086

The Company's investments are entirely allocated to fixed income securities and accordingly interest income arises entirely from fixed income securities. Interest income increased in 2021 compared to 2020 due to income generated

from increased allocations to investment grade corporate bonds, modestly higher investment rates, and reinvestment of positive cash flow. The net unrealised losses were primarily driven by the significant rise in world-wide risk free rates throughout 2021.

The Company did not recognise any gains or losses, with respect to its investment portfolio, directly in other comprehensive income (within equity) during the year as its portfolio is valued at fair value through profit and loss.

The Company did not have any investments in securitisations.

#### A.4. PERFORMANCE OF OTHER ACTIVITIES

The Company recognised a gain of €0.9m million (2020: loss of €2.1 million) on foreign exchange in the income statement from the revaluation of all balances held in currencies other than the functional currency of the Company.

The Company recognised a total income tax benefit of €0.5 million (2020: expense €1.4 million). The effective tax rate is driven by the location of profits earned across the various tax jurisdictions in which the Company operates, along with the utilisation of tax losses across the tax jurisdictions.

#### A.5. ANY OTHER INFORMATION

There is no other material information regarding the business and performance of the Company.

#### **B. SYSTEM OF GOVERNANCE**

#### **B.1. GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE**

The Company is categorised as Low Impact under the CBI's Probability Risk and Impact System (PRISM) and is subject to the Corporate Governance Requirements for Insurance Undertakings 2015 (the Corporate Governance Requirements). The Company is satisfied that the corporate structures and practices pertaining to corporate governance as described in the Corporate Governance Requirements are operating effectively.

#### General governance standards and structure

The Board structure and responsibilities are set out in the Board Charter. The Board is collectively responsible for promoting the success of the Company by directing, supervising and overseeing its affairs. The Board is also responsible for:

- Business Strategy: to set and oversee the business strategy for the Company. To this end, the Board shall
  consider and challenge the appropriateness of the cascaded Group strategy for the Company and as
  applicable make necessary amendments to same;
- Values and Objectives: to set and uphold the values and standards necessary to ensure that the Company's
  obligations to shareholders and other stakeholders, including customers, employees and creditors, are met;
- Ethics, business conduct and conflicts of interest: to conduct effective, prudent and ethical oversight of the Company;
- Risk management, internal controls and control functions: to ensure the establishment and oversight of the
  control functions of Risk Management, Actuarial, Internal Audit and Compliance, thereby ensuring that they
  have adequate resources and sufficient authority to operate effectively as well as an appropriate financial
  reporting and accounting framework and a remuneration framework in line with the risk strategies of the
  Company;
- Governance System: to define the corporate governance system and promote the highest standards of
  corporate governance (including an appropriate risk culture). Ensure that effective and clear structures and
  reporting arrangements exist within the Company especially with respect to outsourcing. To ensure the
  establishment and operation of prudent and effective controls to assess and manage the risks associated
  with the Company's operations;
- Business lines and key operational decisions: to approve any material organisational and operational decisions;
- Financial condition, risk profile and capital position: to regularly assess the financial condition, risk profile
  and solvency position of the Company, to establish a robust risk appetite statement setting out the risks to
  which the Company is exposed and to ensure identified risks are addressed by appropriate contingency
  plans which reflect the areas in which the Board considers the Company to be particularly exposed, the
  Company's documented risk appetite and risk management framework. To assess capital, borrowing and
  liquidity needs and risks. The Board has ultimate responsibility for and ownership of the Company's ORSA
  process; and
- Appointment of senior executives and performance monitoring: to ensure the Company has appropriate
  succession plans and to select Senior Management on a fit and proper basis. The Board is responsible for
  endorsing the appointment of Pre-Approval Controlled Functions (PCFs) and individuals who may have a
  material impact on the risk profile of the Company (and monitoring on an on-going basis their
  appropriateness for the role).

The Board is collectively responsible for acting in the interests of the shareholder and the Company in accordance with applicable legal and regulatory requirements. Each Director's individual responsibilities are set out in their respective letters of appointment or contract. The Board comprises two Independent Non-Executive Directors (INEDs), one Executive Director (the General Manager) and three Non-Executive Directors (Group NEDs) who are employed within the Group but not by the Company. The Chairperson of the Board is proposed for reappointment

on an annual basis. The role of Chairperson was vacated by a Group NED during the period and another Group NED was subsequently appointed to the role. The Chairperson, in conjunction with the Company Secretary, ensures that all Directors receive appropriate on-going training and are actively encouraged to further their personal development in matters relevant to the Company and its interests.

The Board has established two sub-committees: the Audit Committee and the Risk Committee.

#### **The Audit Committee**

The Audit Committee has been established to oversee the Company's financial reporting process and the internal control environment on behalf of the Board. The Audit Committee is governed by an Audit Committee Charter.

The Audit Committee is composed of three Non-Executive Directors, two of whom are Independent Non-Executive Directors. The Chair of the Audit Committee is an Independent Non- Executive Director

#### The Risk Committee

The Risk Committee has been established to provide oversight and advice to the Board on the Company's current risk exposures and its future risk strategy. The Risk Committee has oversight responsibility for company policies and activities related to overall management of the Company's risks pursuant to the business strategy and risk management policy established by the Board.

The Risk Committee is composed of four directors comprising two Independent Non-Executive Directors, one Group Non-Executive Director and the Executive Director.

# **Powers Delegated by the Board**

The Board has reserved certain powers for itself and has delegated other powers. This delegation is documented in the Board's Delegation of Authority Policy. Authorities that have not been previously delegated and powers that have not been reserved for the Board are delegated to the General Manager.

Under this authority, the General Manager has established an Executive Committee, called the Legal Entity Management Team (LEM).

The LEM is the senior executive team within the Legal Entity and is established for the purpose of providing advice and making recommendations to the General Managers in respect of the Company's operations. The LEM is responsible for managing the overall business, implementing the business plan in line with the agreed strategy and overseeing the management of risk and regulatory compliance across the organisations.

The Company's LEM comprises the Company's General Manager, CRO, Head of Actuarial Function, Head of Finance and Head of Compliance and has established the following subcommittees to aid its management of the Company:

- Legal Entity Reserving and Capital Committee
- Branch Managers' Committee
- UK Branch Oversight Committee
- · Investment Committee

# Legal Entity Reserving and Capital Committee

The Legal Entity Reserving and Capital Committee is responsible for the quarterly review and approval of the Technical Provisions, Solvency Capital Requirement, Economic Balance Sheet and Own Funds of the Company before the quarterly Quantitative Reporting Templates (QRTs) are filed with the CBI. The Committee also reviews these items in advance of the submission of annual returns and makes recommendation to the Audit Committee in respect of the returns.

The Committee also reviews and approves the assumptions and assumption changes supporting the calculation of the Technical Provisions on an annual basis before submission to the Board.

The Committee is chaired by the Head of Finance and the other members are the Head of Actuarial Function, the CRO and the General Manager. The Committee meets at least quarterly.

# **Branch Managers' Committee**

The Committee's main responsibilities are to monitor and review issues arising from the day-to-day operation of the Branches, reviewing the commercial performance of the Branches, reporting on legal and regulatory developments in the respective jurisdictions that affect the operation of the Company and risk incidents or events that have occurred during the quarter.

The Committee meets once a quarter and is chaired by the General Manager. The other members of the Committee are the Branch Manager, CRO, Head of Finance and the Head of Compliance.

# U.K. Branch Oversight Committee

The Committee is the Governing Body, as defined in the Prudential Regulatory Authority's Rulebook, of the UK Branch.

Its responsibilities include management and oversight of the UK Branch. In addition, the Committee reviews and approves the UK specific regulatory returns and the approval of UK Branch specific policies for Risk Management, Internal Audit, Outsourcing, Regulatory Reporting and Compliance.

The Committee is chaired by the General Manager and its members are the U.K. Branch Manager, Head of Finance, CRO, Head of Actuarial Function, Head of Compliance and Senior Legal Counsel.

#### **Investment Committee**

The Committee is responsible for providing oversight of investments and monitoring and analysing the Company's investment results and portfolio movements. In addition, the Committee reviews any potential investment opportunities.

The Committee ensures that the investment portfolio remains compliant with the investment guidelines, asset allocation plan & risk appetite limits.

# Authority and independence of key functions

The Company has the following key functions: Risk Management, Actuarial, Finance, Internal Audit and Compliance. Risk Management, Actuarial, Finance and Compliance functions have a dotted reporting line to the General Manager. Internal Audit reports to the Audit Committee.

#### Risk Management function

The Risk Management function has independent oversight of risk management activities including identifying, assessing, monitoring and reporting existing and emerging risks. The Risk Management function monitors the risk profile of the Company's position against risk appetite statements and tolerances and reports deviations in line with agreed reporting procedures.

The CRO leads the Risk Management function, is also a member of the LEM and a PCF 14 under the CBI's Fitness and Probity regime.

The CRO reports on a quarterly basis to the Risk Committee.

# **Actuarial function**

The Company has a Head of Actuarial Function. The Head of Actuarial function ("HoAF") is responsible for coordinating the calculation of technical provisions, informing the Board of the reliability and adequacy of the calculation of technical provisions and providing an opinion on the Company's retrocession and underwriting policy.

The Head of Actuarial Function is a member of the LEM and a PCF 48 under the CBI's Fitness and Probity regime.

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#### Finance function

The Company's Finance function has responsibility for ensuring the accuracy of the Company's financial reports and quarterly/annual statutory filings, ensuring compliance with relevant accounting standards and corporate law requirements, the monitoring of solvency ratios and calculations and ensuring that sufficient capital is maintained to meet business and regulatory requirements.

The Head of Finance is a member of the LEM and a PCF 11 under the CBI's Fitness and Probity regime.

#### Internal audit

Internal Audit is an independent evaluation and appraisal function reporting to the Board through the Audit Committee. Internal Audit examines and evaluates the functioning of the internal controls and other elements of governance and provides independent assurance over the operations of the Company. Internal Audit's responsibilities are set out in the Internal Audit Charter.

The Head of Internal Audit, who is a PCF 13 under the CBI's Fitness and Probity regime, attends LEM meetings on at least a quarterly basis and reports to the Audit Committee and the Board on a quarterly basis.

# Compliance function

The Compliance functions advises the Company on compliance with the laws, regulations and administrative provisions adopted pursuant to the Solvency II Directive. The function also identifies and assesses the impact of any changes in the legal environment, on the operations of the Company. In addition, the function designs, implements and execute a compliance monitoring framework to provide assurance to the Board on the adequacy of measures taken by the company to meet regulatory requirements.

The Head of Compliance is a member of the LEM and a PCF 12 under the CBI's Fitness and Probity regime.

# Material changes in the governance of the Company in 2021

# Changes in Board membership

Three Directors (one Executive Director with a resignation effective date of 31st December 2020, one Group NED and one INED) resigned and three Directors (one Executive Director with an appointment effective from 1st January 2021, one INED and one Group NED) were appointed to the Board during 2021. The role of Chairperson was vacated by a Group NED during the period and another Group NED was subsequently appointed to the role.

# Establishment of a new Committee

The Company established the Investment Committee during the course of the year.

#### **Material transactions**

There were no transactions during the reporting period with shareholders, with persons who exercise a significant influence on the undertaking, and with members of the Board other than:

- Directors' fees paid to INED's;
- Remuneration paid to Executive and Group NED's; and
- Intra-group transactions in the normal course of business.

The intra-group transactions in the normal course of business consisted of:

- Reinsurance agreements with other PartnerRe Group entities:
  - 1. Whole account quota share with PRESE:
    - a. 85% for all underwriting years; and
    - b. 90% for a small number of named risks.

2. Stop loss agreement with Partner Reinsurance Company Ltd (PRCL), attaching at a loss ratio of 120% with a limit of 870%.

The reinsurance arrangements were also in place during 2020 with broadly similar terms and conditions.

 Recharges for staff costs and other outsourced services, Further details of outsourced services are provided at section B.7. Outsourcing.

# Processes for monitoring the effectiveness of the system of governance

The roles and responsibilities of the Board and its Committees, as outlined under their respective Charters, are reviewed and updated at least annually.

#### Assessment of Board and Committee performance

The Board formally reviews its overall performance, relative to the Board's objectives, on an annual basis. This includes a review of the Audit Committee and the Risk Committee in relation to their respective performances.

Annually, each director performs a self-assessment whereby he or she evaluated his or her performance against a range of key performance indicators. In addition, each Board Director completes an annual Board Evaluation reviewing the overall performance of the Board and that of individual directors, relative to the Board's objectives.

# **Corporate Governance**

The Board receives quarterly updates from the Company's Compliance function in respect of the activity of the Compliance function in the quarter. As part of this report, details of new regulatory and legal requirements and the assessed impact that they will have on the Company are provided to the Board. In addition, the report provides details of any compliance monitoring activity that has taken place in the quarter concerned. Such reporting is designed to provide the Board with sufficient comfort that the Company has complied with all requisite regulatory and legal requirements and where necessary to highlight any occasions on which the Company has deviated from such requirements.

# Internal audit plan

The Board, with the assistance of the Audit Committee, monitors the effectiveness and adequacy of the Company's internal controls (including the Company's financial reporting process) and I.T. systems through reports received from the Internal Audit function as per Internal Audit's plan. The Board and the Audit Committee review and approve the Internal Audit plan on an annual basis.

#### Adherence to Group and Company policies, guidelines, procedures and use of Group functions

The Board satisfies itself as to the appropriateness of compliance with Group policies and Group functions for the Company and in particular that these policies and functions take full account of local business needs, Irish laws and regulations and the supervisory requirements of the CBI. Where necessary, Company specific guidelines are put in place in addition to the Group policies to ensure compliance with local business needs and laws, regulations and supervisory requirements.

Board of Directors General Manager Risk Committee Audit Committee Legal Entity Management Team General Manager (Chair) Head of Finance Head of Actuarial Function Chief Risk Officer Head of Internal Audit Head of Compliance Legal Entity Reserving Branch Managers' U.K. Branch Oversight Investments Committee and Capital Committee Committee Committee Head of Finance • General Manager (Chair) General Manager (Chair) General Manager Head of Finance • UK Branch Manager (Chair) Chief Risk Officer Legal Entity Legal Entity Head of General Manager Management Management Team Investments Head of Actuarial Team Senior Legal Coursel ChiefInvestment Function UKBrandı Officer Chief Risk Officer Manager Director of Financial Operations Board Committee Board Sub-Committee Executive Function/ Committee

# **Remuneration Policy**

The Remuneration policy is approved by the Board. It is the intention of the Company to ensure that the ways in which it remunerates its employees, officers and directors meets with good practice standards as well as applicable regulatory requirements.

The Remuneration Policy is designed to meet the following objectives:

Align the long-term interests of the Company's participants and shareholders;

- Deter excessive risk taking;
- Establish competitive pay levels on a total compensation basis;
- · Clearly link pay with performance;
- Provide flexibility in form and structure to meet individual time horizons;
- Demonstrate good governance and corporate responsibility; and
- Encourage the retention of the Company's participants.

The Board considers the following structure of remuneration to be appropriate, in the context of the Company's activities and the applicable regulatory requirements:

- The philosophy is to remunerate at the median of the appropriate market.
- Remuneration is comprised of base salary and variable remuneration.
- Local requirements relating to remuneration structures will be respected as appropriate.

With regard to the remuneration of its INEDs the Company's policy is that, in keeping with their duty of independence, they shall be remunerated by a fixed fee only, and no incentive-based payments will be made.

It is the Company's policy that NEDs who are employees of the Group receive no remuneration for their duties as Directors of the Company.

The variable components of remuneration are annual incentive and Long Term Incentive (LTI) awards. The annual incentive is a variable, performance-based component of compensation. Each employee has a target annual incentive payment, which is set as a percentage of base salary. The actual payment is then based on a combination of business unit performance, individual performance and overall Group performance. The target metrics are set by Group each year.

Pension entitlements are typically paid on a contribution basis and are based on a percentage of the participant's base salary depending upon competitive local market practice and vesting provisions meeting legal compliance standards and market trends. Certain Swiss based employees, who are employed by PartnerRe Holdings Europe Ltd. are members of a hybrid pension plan, which contains elements of a defined benefit and defined contribution plan.

#### **B.2. FIT AND PROPER POLICIES AND PROCEDURES**

As an insurance undertaking authorised by the Central Bank of Ireland (CBI), the Company is subject to the CBI's Fitness and Probity Standards. The Company's Fitness and Probity Policy (the Policy), which is reviewed and approved annually by the Board, governs its fitness and probity procedures which determine which roles fall under the Fit and Proper (F&P) Standards. These procedures also provide a mechanism for collating and assessing information to evidence compliance with the F&P Standards and ensuring that all relevant individuals meet and continue to meet them and fulfil any training obligations. The Policy and the procedures cover due diligence requirements relating to:

- New appointments of individuals performing PCFs and Controlled Functions (CFs);
- Internal PCF and CF role transfers and promotions;
- · Outsourcing of PCF and CF roles;
- · On-going due diligence of individuals performing PCF and CF roles; and
- Potential consequences if an individual performing a PCF or CF role does not meet or no longer meets the Fitness and Probity Standards.

The Company's due diligence involves analysis of the competencies and degree of probity required to discharge a particular function (and whether the responsibilities of the function fall into a PCF or CF category). This ensures that individual's qualifications, professional skills, knowledge and experience correspond with role requirements and they have maintained professional qualifications by completing continuous professional development where required. It serves to ensure that individuals discharging a particular function have the competence and ability to understand the technical requirements and inherent risks of the business and the management processes required to conduct its operations effectively. If deemed necessary, relevant and comprehensive training is carried out in conjunction with the PCF or CF appointment process together with the provision of relevant training on an ongoing basis.

The Company maintains records of the due diligence undertaken in respect of individuals performing PCF or CF roles on its behalf prior to their appointment and annually to evidence their ongoing compliance with the Fitness and Probity Standards. The annual process involves ensuring their completion of a detailed Annual Certification which includes confirmation of compliance with the Fitness and Probity Standards and certification of, probity, financial soundness, that all employment and directorships have been disclosed and will not materially impact performance of a PCF role and that continuing professional development has been completed where required to maintain a qualification. Outputs are reviewed by the Head of Compliance and results of the due diligence are recorded.

The due diligence outputs form the basis of the Board's endorsement of the appointment of individuals performing PCF roles within the Company (including all Board Members and Directors performing Committee and Board Chair roles) and those who may have a material impact on its risk profile (being the General Manager, Head of Finance, CRO, Head of Internal Audit, Head of Compliance, Head of Actuarial Function, UK Branch Manager, Head of Underwriting, Head of Investments and Head of Claims).

# B.3. RISK MANAGEMENT SYSTEM INCLUDING THE OWN RISK AND SOLVENCY ASSESSMENT

The Company has implemented a Risk Management Framework (RMF) which sets out the key components of its risk management system: risk governance and controls, risk identification and assessment, risk appetite, ORSA and monitoring and reporting.

# Three lines of defence

The Company operates with a three lines of defence model. The first line of defence owns and manages risks and is responsible for implementing internal control measures to ensure compliance with all applicable laws and regulations.

The Compliance and Risk functions are part of the second line of defence and are responsible for the following activities:

- Developing risk management frameworks and policies;
- Identifying, assessing and communicating known and emerging issues and risks;
- Identifying shifts in the Company's risk profile;
- · Communicating compliance and regulatory risk scenarios;
- Assisting management in developing processes and effective controls to manage risks;
- Monitoring the implementation of risk management processes and internal controls;
- Monitoring the adequacy and effectiveness of internal controls;
- Proactively testing and monitoring high risk areas to ensure policies and procedures are being implemented properly;
- · Providing guidance and training on risk management processes; and
- · Managing the timely remediation of deficiencies.

The HoAF is part of the second line of defence (independent of the first line Reserving function) and provides independent review and advice to management, the Audit Committee and the Board on data, models, methodologies and assumptions.

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The third line of defence is Internal Audit and responsible for providing oversight and independent assurance on the control environment to the Company.

# Risk governance and controls

The Risk function consists of the CRO and the supporting Risk team. The CRO and the Risk team collaborate with and are supported by Risk resources in other Group entities. Within the Company, the CRO has a dotted reporting line to the General Manager and reports directly to the Risk Committee and the Board.

Responsibilities of the Board and its Committees are set out in section B.1. Specific responsibilities of the Board include setting the overall risk appetite and risk limits, overseeing and reviewing the key risks of the Company, approving the risk strategy, the RMF, risk policies and the ORSA and promoting a culture which is conducive to effective risk management.

The Company's risk policy framework addresses groups of homogenous and related risks and establishes risk management approach, risk appetite, mitigation principles, risk ownership, governance and escalation procedures. Individual risk policies are supported by sub-policies and operating guidelines. The risk policy framework consists of Group and Company risk policies which are reviewed and approved at least annually.

The Company uses PartnerRe's internal control application system Archer to document internal controls and manage its risk register. Controls and other risk management activities are performed by process owners within the business units and support functions throughout the year. Internal Audit conducts audits which test the controls to ensure appropriate design and operational effectiveness.

#### Risk identification and assessment

The CRO coordinates and performs an annual risk identification and assessment process to assess the Company's risks and identify any new or emerging risks and important trends. This process facilitates the setting of risk appetite by the Board and the management of material risks. In response to current events, ad-hoc risk assessments of individual risks may also be conducted.

The Company's risks are structured in a risk universe which is constantly evolving in response to the evolving risk profile of the Company. The risk universe intends to capture all relevant material and potentially material risks. Each risk in the Risk Universe has a risk owner. The CRO monitors the risk profile on an ongoing basis through interaction with the LEM and business leaders and through participation in relevant Group Committees.

At least annually, a risk identification workshop is held with the LEM to review the Company's risk universe and ensure that all material and potentially material risk categories are captured. Separately, an annual emerging risk workshop is held with the LEM and business leaders to discuss and identify emerging risks for the Company. Any new risks identified are assigned a risk owner by the CRO in consultation with the LEM.

The CRO, in collaboration with the risk owners and other subject matter experts, assesses each risk of the Risk Universe at least annually. The individual risk assessments are documented and consider the regulatory, operational and control environment, key exposures, correlation with other risks and mitigation. For assumed risks, the tail loss potential is quantified. The individual risk assessments are stored in Archer and support the quarterly risk certification process of the first-line risk owners.

The CRO prepares an annual Risk Assessment Report (RAR) which summarises the individual risk assessments. The RAR is presented to the LEM for review and input and then discussed with the Risk Committee and Board. The RAR assists the Risk Committee and Board in understanding the Company's risk profile and the setting of risk appetite and risk limits.

In the context of the COVID pandemic which developed during 2020 and is ongoing, risks relating to the Company's life, non-life and investment portfolios were assessed as part of COVID monitoring within the management team and with the Board. The regular COVID monitoring updates to the Board were discontinued at the end of June 2021; monthly monitoring by management remains in place. Risks related to COVID continue to be monitored by the management team and are included in the annual ORSA.

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# Risk appetite

Risk appetite is the overall level of risk the Company is prepared to accept in pursuit of its strategic objectives. Risk appetite, risk limits, capital level and retrocession structure are considered and inform the setting of the Company's strategy and business plan.

Risk appetite is documented in the Risk Appetite Framework (RAF). The RAF is reviewed at least annually and approved by the Board. In setting its risk appetite, the Board considers stakeholder expectations alongside the business environment and risks including the current level of risk in the business plan and strategy.

Risk appetite is structured into Risk Appetite Statements and Risk Limits and Tolerances.

# Risk appetite statements

The Company defines risk appetite statements for all categories of its risk universe.

# Risk limits and tolerances

The Company defines key risk indicators as quantitative or qualitative risk limits following a red-amber-green scale, covering the Solvency II solvency ratio, all material assumed risks as identified in the latest Risk Assessment, and non-assumed risks and non-material assumed risks as considered appropriate.

The COVID pandemic did not necessitate updates to the Company's RAF.

# Own Risk and Solvency Assessment (ORSA)

The Company undertakes at least annually an internal assessment of its risk and solvency positions and evaluates these against the business plan. The ORSA report builds on the Risk function activities throughout the year and aligns with the business planning and strategy setting process. The ORSA evaluates projected risk and solvency positions based on the three-year plan which in turn informs the planning process. The capital projections in the ORSA are based on projections of own funds and SCR according to the Standard Formula and the three-year business and investment plans. Projected capital adequacy is assessed against the Company's overall risk appetite and risk limits and tolerances.

The ORSA process encompasses the regular review of the ORSA policy and governance framework, the annual risk identification and assessment process, the review and continuous evolution of risk appetite and risk limits and tolerances, risk monitoring, and stress testing, reverse stress testing and capital projections. Stress testing is based on the Company's view of which risks are material.

Individual components of the ORSA process directly inform the Company's risk management system. The annual Risk Assessment informs the Company's risk monitoring as well as stress testing in the ORSA. The ORSA projections inform business planning, risk management and risk monitoring activities. The ORSA projections also inform capital management such as the design of the Company's reinsurance programme or the identification of the need for capital injections.

The ORSA is prepared annually (or more frequently if warranted) by the CRO, reviewed by the HoAF who documents her opinion, the LEM and the Risk Committee. The Board ultimately approves the ORSA. Following approval, the Company submits the ORSA to the CBI.

Elements of the ORSA process are also applied to large portfolio initiatives or in times of stress.

The 2021 ORSA includes COVID downside stress testing of the capital projections.

# Risk monitoring and reporting

Risk owners and the Risk function monitor risks on an ongoing basis through regular reports, interaction, participation in approval processes and management meetings.

The CRO reports on a quarterly basis to the Risk Committee and the Board. The quarterly risk report to the Risk Committee includes reporting on compliance with the RAF, risk limits, operational incidents and any other relevant developments such as changes in retrocession.

In times of financial or operational stress, the LEM, the Risk Committee and the Board are updated on the Company's risk profile more frequently.

#### **B.4. INTERNAL CONTROL SYSTEM**

The Company's internal control system is designed to adequately and effectively identify, manage, monitor and report on the risks the Company is or may be exposed to in order to secure compliance with applicable laws and regulations. It is also designed to detect and correct non-compliance in an efficient and effective manner.

The internal control system consists of a series of preventative and detective controls to prevent, mitigate and detect risk manifestation. The control system allows for escalation of control failures.

The Company will employ risk mitigation techniques as deemed appropriate to remove or reduce risks and remain within the stated risk appetite.

The Board ultimately oversees the internal control system and is supported by the Audit Committee. The Company's Compliance, Finance, Actuarial, Risk Management and Internal Audit functions are all key contributors to the governance and oversight of the Company's internal control system.

There are established robust internal controls in existence across each of these key functions in addition to the controls in place across all other areas e.g. Underwriting, Claims, Investments and I.T.

# **Compliance function**

The Compliance function is responsible for:

- advising the Company on applicable laws and regulation that apply to the Company as an authorised insurance company;
- providing training to staff, where necessary, on the laws and regulations applicable to the Company;
- identifying and assessing the possible impact of any changes to the applicable laws and regulations on the Company;
- providing assurance to the Board on the adequacy of measures that have been taken by the Company to comply with applicable regulations;
- managing the relationship with the CBI and other financial services regulators; and
- maintaining the Company's operating licenses.

The Company's Compliance Framework comprises the tools that the Compliance function employ to meet its responsibilities. The Compliance Framework is comprised of the following elements:

- Compliance Watchlist
- Compliance Business Plan
- Compliance Monitoring Plan
- Compliance calendar
- Management and co-ordination of Compliance policies
- Training programme

Quarterly, compliance reporting to the Board includes, but is not limited to, the following:

- Pending or future regulations and legislation which will affect the Company and for which adequate time and resources shall be allocated to meet the requirements;
- Details of regulatory visits or significant contacts;
- Updates on progress against the approved Compliance Business and Monitoring plans with particular reference to the adequacy of compliance resources; and
- Any other relevant information.

# **B.5. INTERNAL AUDIT FUNCTION**

The Corporate Audit Group's (Internal Audit) mission is to provide the Audit Committee and Board with an independent appraisal function to assess the Company's internal control and operating environment so as to provide reasonable assurance that:

- · operations are effective & efficient;
- financial reporting is reliable;
- there is compliance with laws & regulations;
- · assets are appropriately safeguarded; and
- the Company's risk management policies are consistently applied as documented.

Annually, Internal Audit provides the Audit Committee and Board with an overall assessment of the condition of the Company's internal control environment based on a risk based internal audit program.

Internal Audit reports functionally to the Audit Committee in order to ensure independence. Internal Audit acts as the third line of defence. Internal Audit closely interacts with the second line of defence (e.g. Risk Management and Compliance) in relation to risk identification and risk assessment. Internal Audit leverages the work of the second line of defence when deemed appropriate from a governance and independence point of view.

Internal Audit regularly tests the Company's risk policies and the internal controls associated with the respective policies. The results of such testing are included in audit reports circulated to management, and summaries of the results are provided to the Audit Committee and Board.

# **Independence of Internal Audit**

To provide for the independence of Internal Audit, its personnel report directly to the Group Chief Audit Officer, who reports functionally to the Group Audit Committee and administratively to the Group Chief Executive Officer. The independence of the internal audit function is periodically evaluated by the Group Audit Committee.

Internal Audit reports directly to the Company's Audit Committee on a quarterly basis and also separately meets with the Independent Non-Executive Directors on at least an annual basis. Internal auditors shall have no direct operational responsibility or authority over any of the activities they review. Additionally, they shall not install systems or procedures, prepare records, or engage in any other activity that would normally be audited. Internal auditors do not carry out any other functions within the Company.

# **B.6. ACTUARIAL FUNCTION**

The Actuarial function is a key function of the Company's system of governance.

The Actuarial function is split into first line of defence and second line of defence. First line teams are responsible for production of reserves, performance of controls, monitoring of data quality, management of actuarial models, production of experience analysis and best estimate assumptions, and documentation of these processes. Second line teams led by the Head of Actuarial Function ("HoAF") provide an independent review and advice to management and the Board on data, models, methodologies and assumptions.

The Actuarial function's tasks are undertaken by a team who have the appropriate knowledge of actuarial and financial mathematics and experience, proportionate to the nature, scale and complexity of the risks present in the business.

The duties of the Actuarial function are under the responsibility of the HoAF who provides independent oversight and reports to the Board via the Audit and Risk Committees. The HoAF, a PCF 48 under the CBI's Fitness and Probity regime, is a member of the Society of Actuaries in Ireland with the relevant level of experience required for the role.

#### **B.7. OUTSOURCING**

The Company is part of a multi-national reinsurance group and as such the Company uses the expertise and resources from other Group entities and jurisdictions under a shared services model. The Company's outsourcing arrangements are predominately comprised of support provided via intra-group arrangements. These include support in relation to underwriting, business development and underwriting authorities, claims, regulatory legal and compliance, finance, internal audit and investments. The outsourcing of such services to intra-group affiliates falls within the scope of the Company's Outsourcing Framework. Activities provided by the Company's branch network and by way of secondments fall outside the scope of the Company's outsourcing framework.

The Company outsources certain critical or important functions to third parties in respect of underwriting and claims handling. The service providers to whom the Company outsources are based in Ireland, the U.K., the U.S., Singapore and Bermuda.

The Company has adopted the Group Outsourcing Guidelines (the Guidelines) which establish the Outsourcing Control Framework and sets out parameters within which the Company can enter into outsourcing arrangements. The Guidelines are approved by the Board on an annual basis.

The Guidelines impose clearly defined roles and responsibilities and embeds ownership of outsourcing arrangements within the Company.

The Company's Outsourcing Control Framework is designed around the following key pillars:

- Due Diligence: materiality of all functions or activities considered for outsourcing are assessed and due diligence commensurate to the risks of the outsourcing is undertaken. Critical or important outsourcing arrangements are subject to more detailed consideration, examination and regulatory notification than noncritical outsourcing arrangements.
- Written Agreements: all outsourcing arrangements are evidenced by a written contract.
- Register of Outsourcings: a register of outsourcings is managed by the General Manager and identifies, inter alia, the service recipient, service provider, service provider owner, description of services, whether the outsourcing is intra-group or third-party, materiality, location of service delivery, monitoring and oversight controls, confirmation that an agreement is in place, the services' commencement and termination date, due diligence undertaken and confirmation of service provider business continuity plans.
- Monitoring Oversight and Reporting: oversight controls and procedures are commensurate to the risks of
  the outsourcing in question and must be sufficient to facilitate appropriate oversight and supervision of the
  outsourcing by the service recipient owner, the Company's General Manager and the Company's Board.
  Oversight of outsourcing must also promptly identify any material changes, issues and/or deficiencies.

The Company categorises controls in respect of its outsourcings as follows:

- Level 1: Local Company employee representation within the relevant business or support unit providing intra-group services to the Company;
- Level 2: Regular meetings between the service provider and the Company and the establishment of embedded communication channels;
- Level 3: Formal reporting from the service provider to the Company including, where appropriate, reporting directly to the Company's senior management team, Board and/or Audit or Risk Committees; and
- Other Bespoke Controls: Relevant for third party service providers according to relevant third party and type
  of service(s) outsourced.

Annual Review Process: On an annual basis, the Risk function assesses the relevant risks to the Company in respect of its existing and proposed outsourcing arrangements and confirms whether sufficient controls and procedures are in place to manage such risks and, where relevant, identifies any proposed recommendations to improve the Outsourcing Control Framework.

#### **B.8. ANY OTHER INFORMATION**

The system of governance has been established taking account the size, nature and scale of the Company's operations and the complexity of inherent risks. The Compliance Function conducts an annual review of adherence to the Corporate Governance Requirements and reports to the Board on the review outputs and any recommended governance enhancements. This informs assessment of the adequacy of the system of governance which has been satisfactorily assessed as adequate for the Company.

There is no other material information regarding the system of governance of the Company.

#### C. RISK PROFILE

# Risk profile

The Company comprehensively identifies and assesses risks in the annual risk identification and assessment process, resulting in the Risk Assessment Report (RAR). Key risks identified in the RAR are regularly monitored by risk owners, the Risk function and in the Risk Committee. Details are included in section B.3 of this report.

The Company manages risk exposures in the individual underwriting and investment units with operating limits such as those expressed in the Underwriting and Investment Guidelines. There remains a chance that losses can exceed predefined thresholds, for example, if multiple losses occur within the same year or if the Company's internal assessment of capital at risk for a single or multiple sources of risk proves insufficient. To reduce the chance of these unfavourable outcomes, the Company strives for a well-diversified and balanced book of business, applies and regularly monitors risk limits for material key risks, and manages its net position with reinsurance to internal and external counterparties and with other risk mitigation strategies.

# Mitigation of underwriting risk by use of reinsurance

The Company uses external reinsurance agreements to reduce its exposure on certain assumed underwriting risks and to mitigate the effect of any single major event or the frequency of medium-sized events. These agreements provide for the recovery of a portion of losses and loss expenses from reinsurers.

The Company's external reinsurance agreements cover most of its non-life classes of business and are bought on a proportional and non-proportional basis.

Reinsurers must be approved based on their financial condition and business practices, with stability, solvency and credit ratings being important criteria. Capacity and credit rating limits per reinsurer are put in place and monitored to mitigate counterparty credit risk.

The Company remains liable to its policyholders to the extent that the reinsurers do not meet their obligations under reinsurance agreements and, therefore, reinsurance is subject to credit risk in all cases and to aggregate loss limits in certain cases. The Company holds collateral, securities and letters of credit under certain reinsurance agreements. Provisions are made for amounts considered potentially uncollectible and reinsurance losses recoverable from reinsurers are reported after allowances for uncollectible amounts.

The Company further mitigates assumed underwriting risk with the purchase of internal reinsurance cover from other Group companies. The cover that the Company has in place with other Group companies as at 31 December 2021 can be summarised as follows.

- (1) Whole account quota share with PRESE:
  - 85% for all underwriting years
  - 90% for a small number of named risks
- (2) Stop loss agreement with PRCL, attaching at a loss ratio of 120% with a limit of 870%.

External reinsurance inures to the benefit of internal reinsurance.

The main objectives of the reinsurance cover are to reduce the capital requirements and associated cost of capital for the Company, to ensure the Company is in a position to be a well-capitalised insurer for its clients, and to ensure the Company receives and maintains an appropriate rating from the rating agencies.

#### C.1. UNDERWRITING RISK

The Company uses a number of tools and metrics which help to monitor and mitigate the risks inherent to its underwriting activities which is the core business of the Company:

Underwriting and pricing guidelines;

- · Underwriting and pricing processes and controls; and
- · Regular risk reporting on selected key risk indicators for material risks of the Company.

The Solvency Capital Requirement (SCR) in the Solvency II framework is based on a value-at-risk measure calibrated to a 99.5% confidence level over a one-year time horizon.

The SCR for non-life underwriting risk, using the Standard Formula, on a pre-diversified basis is €29.5m (2020: €24.1m), which is 51% (2020: 44%) of the Basic Solvency Capital Requirement (BSCR) before diversification.

The non-life underwriting risk requirement includes premium and reserve risk, lapse risk and catastrophe risk.

Sensitivity tests are conducted to assess the variability of the non-life underwriting risk SCR.

The following sensitivities assess the impact on the non-life underwriting risk SCR and Solvency II own funds to adverse deviations in non-life best estimate liability (BEL) net of reinsurance; the impact on own funds shown in the table relates to the adverse deviation of the BEL and corresponding increase of risk margin.

Adverse deviation of current net best estimate liabilities	Impact on SCR non-life underwriting risk	Impact on Own Funds (before tax):	Impact on SCR non-life underwriting risk	Impact on Own Funds (before tax):
	2021	2021	2020	2020
€'m	€'m	€'m	€'m	€'m
10	+1	(11)	+1	(11)
20	+2	(22)	+2	(22)

The following sensitivities assess the impact of writing additional premium on the SCR for non-life underwriting risk.

Additional amount of net premiums underwritten	Impact on SCR non-life Underwriting Risk	Impact on SCR non-life Underwriting Risk
	2021	2020
€'m	€'m	€'m
5	+1	+1
10	+2	+1

The Company's RAR identified natural catastrophe, terrorism, casualty and single-risk property lines as material non-life underwriting risks and monitors these risks in the Risk Committee and Board.

# Natural catastrophe risk

Natural catastrophe risk is the risk that the aggregate losses from natural perils materially exceed the net premiums that are received to cover such risks. The Company considers both catastrophe losses due to a single large event and catastrophe losses that would occur from multiple (but potentially smaller) events in any year.

The Company measures exposure to natural catastrophe risk by peril-zone and at annual aggregate level. The overall approach to risk measurement has remained unchanged, however, the modelling of individual peril-zones and annual aggregation is reviewed and updated on a regular basis. The Company's RAF includes a key risk indicator for natural catastrophe risk which is monitored in respect of compliance with stated risk appetite on a quarterly basis in the Risk Committee and Board.

The Company manages and mitigates natural catastrophe risk with monitoring of peril-zone and annual aggregate exposures, ongoing portfolio analysis, portfolio management, external and internal reinsurance. For selected perils including peak risks, specific external reinsurance is purchased. The appropriateness of risk mitigation arrangements to the risk profile is reviewed on an ongoing basis by the Risk function and a dedicated reinsurance team within the Underwriting function.

The Company has world-wide exposures to natural catastrophe. Exposures have slightly increased during 2021 within approved risk appetite. On a gross basis and net basis, the largest concentration is to US windstorm and US, Australian and Canadian earthquake perils.

Stress and scenario testing for natural catastrophe risk is undertaken in the annual risk assessment and in the ORSA including scenarios where external reinsurers default on their obligations to the Company. The stress and scenario testing shows that the Company can absorb such losses and remain within stated risk appetite with respect to its solvency ratio.

#### **Terrorism risk**

The Company is exposed to terrorism risk through its property and casualty lines of business. Terrorism risk is the risk of financial losses due to acts of terrorism.

The Company measures exposure to terrorism risk with a per-event metric based on geographical accumulation. The overall approach to risk measurement has remained unchanged. The Company's RAF includes a key risk indicator for terrorism risk which is monitored in respect of compliance with stated risk appetite on a quarterly basis in the Risk Committee and Board.

The Company manages and mitigates terrorism accumulation risk with close monitoring of per-event exposures by location, the participation in several national terrorism pools and internal and external reinsurance. The appropriateness of risk mitigation arrangements to the risk profile is reviewed on an ongoing basis by the Risk function and a dedicated reinsurance team within the Underwriting function.

The Company's has world-wide exposures to terrorism with concentration of exposures in the US. The largest exposures net of reinsurance have increased during 2021 within approved risk appetite.

Stress and scenario testing for terrorism risk is undertaken in the annual risk assessment and considers exposure accumulation within a radius of 250 meters. The stress and scenario testing shows that the Company can absorb such losses and remain within stated risk appetite with respect to its solvency ratio.

#### Casualty risk

Casualty risk is the risk that the estimates of ultimate losses for casualty lines of business will prove to be too low, leading to the need for reserve strengthening.

The Company measures casualty reserve risk with metrics based on single-risk exposures, SCR and modelling in the internal capital model. The overall approach to risk measurement has remained unchanged during 2021. The Company's RAF includes a key risk indicator for casualty risk which is monitored in respect of compliance with stated risk appetite on a quarterly basis in the Risk Committee and Board.

The Company manages and mitigates reserve risk for casualty lines by following a disciplined underwriting process, applying prudent reserving policies for determining carried reserves and monitoring of per-risk exposures. Casualty risk is also covered by internal and external reinsurance. The appropriateness of risk mitigation arrangements to the risk profile is reviewed on an ongoing basis by the Risk function.

The Company is mainly exposed to transactional liability and professional lines / directors' and officers' exposure in the US written via Managing General Agents (MGAs). Exposure to casualty risk has increased during 2021.

Stress and scenario testing for casualty risk is undertaken in the annual risk assessment and the ORSA and includes scenario with adverse development of reserves over a multi-year period and scenarios which test the impact of an accumulation of large losses. The stress and scenario testing shows that the Company can absorb such losses and remain within stated risk appetite with respect to its solvency ratio.

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# Single-risk property lines

The Company is exposed to single-risk property lines through its aviation, energy onshore, energy offshore, and property lines of business. The main exposure comes from risks such as explosion, fire, machinery breakdown and business interruption which could lead to individual large losses.

The Company measures exposure to single-risk property lines with metrics based on single-risk exposures and geo-spatial accumulation. The overall approach to risk measurement of single-risk exposures has not changed during 2021, but the calibration of risk metrics based on single-risk exposures has been amended to reflect that the potential for several single-risk events occurring in one year is considered to have increased in line with the growth of the Company's single-risk portfolio. The Company's RAF includes a key risk indicator for single-risk property lines which is monitored in respect of compliance with stated risk appetite on a quarterly basis in the Risk Committee and Board.

The Company manages and mitigates single-risk property lines with the setting of underwriting limits and regular monitoring of single-risk exposures. The risk of large losses is mitigated by external and internal reinsurance. External reinsurance includes specific single-risk protection. Internal reinsurance includes a stop-loss protection with PRCL which absorbs a significant amount of tail risk. The appropriateness of risk mitigation arrangements to the risk profile is reviewed on an ongoing basis by the Risk function.

The Company has an overall well-balanced portfolio. The largest exposures in the various property lines of business are comparable and there is no significant concentration to any one line of business or geographical region. The Company is exposed to both individual large losses and accumulation of several smaller losses across all property lines of business. While largest exposures have not increased in 2021, the overall portfolio and number of risks has increased.

Stress and scenario testing for single-risk property lines is undertaken in the annual risk assessment and the ORSA and includes scenario which test the impact of an accumulation of large losses. The stress and scenario testing shows that the Company can absorb such losses and remain within stated risk appetite with respect to its solvency ratio.

#### C.2. MARKET RISK

The SCR market risk, using the Standard Formula, on a pre-diversified basis is €12.7m (2020: €15.4m), which is 21% (2020: 28%) of the Basic Solvency Capital Requirement (BSCR) before diversification.

The market risk requirement includes interest rate, equity, property, credit spread, currency and concentration risk.

The Company's RAR identified currency, credit spread and inflation risk as material market risks and monitors these risks in the Risk Committee and the Board.

# **Currency risk**

Currency risk is the risk that the fair value or future cash flows of assets and liabilities will fluctuate because of changes in foreign exchange rates. Currency risk arises mainly from transactions and recognised monetary assets and liabilities which are denominated in a currency other than the functional currency of the Company.

The Company measures exposure to currency risk with scenario-based metrics on its net asset value position and with the currency SCR. The overall approach to risk measurement has remained unchanged. The Company's RAF includes a key risk indicator for currency risk which is monitored in respect of compliance with stated risk appetite on a quarterly basis in the Risk Committee and Board.

The Company reviews and manages its net asset value position with a number of formal controls including Treasury review of the net asset value.

The Company's main exposure is to USD and GBP. Exposures can vary over time as assets and liabilities change in line with investment and business developments. Exposures have reduced during 2021.

Stress and scenario testing for currency risk is undertaken in the annual risk assessment and the ORSA and includes the impact of currency fluctuations on the Company's SCR. The stress and scenario testing shows that the Company is mainly exposed to a depreciation of EUR against other major currencies, driven by carrying significant liabilities in currencies other than EUR, and that it can absorb such scenarios and remain within stated risk appetite with respect to its solvency ratio.

Assuming all other variables are held constant, as at 31 December 2021, a 10% adverse movement in the value of the Euro currency against all other currencies comprising the Company's Solvency II Own Funds would have resulted in a €2.3 million (2020: €5.3 million) fall in Solvency II Own Funds.

# Credit spread risk

Credit spread risk is the risk of a significant widening of credit spreads resulting in realised or unrealised investment losses on the Company's standard fixed income securities which may result in economic losses to the Company.

The Company measures credit spread risk with metrics based on credit quality and duration of fixed income instruments and with metrics based on the impact on market value due to changes in market credit spreads. The overall approach to risk measurement has remained unchanged in 2021. The Company's RAF includes a key risk indicator for credit spread risk which is monitored in respect of compliance with stated risk appetite on a quarterly basis in the Risk Committee and Board.

Credit spread risk is managed and mitigated with limits on credit quality and concentration to any single name or sector. Credit spread risk can change from period to period depending on market conditions and asset-liability management actions.

The Company's key exposures are corporate bonds most of which are investment grade (mostly A or BBB) with concentration in the Financial Industry. In 2021, exposure to credit spread risk has increased within approved risk appetite.

Stress and scenario testing for credit spread risk is undertaken in the annual risk assessment and the ORSA and includes stand-alone sensitivities and a variety of short-term and long-term combination scenarios which include losses due to other market or insurance risks in addition to losses due to changes in credit spreads. The stress and scenario testing shows that the Company can absorb such scenarios and remain within stated risk appetite with respect to its solvency ratio.

#### Inflation risk

Inflation risk is the risk of a reduction in purchasing power per unit of money overall or in respect of specific products or services resulting in increased claims and expenses and potentially in monetary action (changes in interest rates) resulting in realised and unrealised gains and losses on the Company's fixed income portfolio.

The Company measures claims and expense inflation risk with a scenario-based metric (introduced during 2021) and inflation risk in combination with interest rate risk with stress and scenario testing in the annual RAR and ORSA (overall approach unchanged). The Company's RAF includes a monitoring metric for claims and expense inflation risk which is monitored on a quarterly basis in the Risk Committee and Board.

The impact of claims inflation is mitigated by external and internal reinsurance. The appropriateness of risk mitigation arrangements to the risk profile is reviewed on an ongoing basis by the Risk function.

Claims and expense inflation risk arises mostly in respect of claims payments. As the scenario-based metric to monitor claims and expense inflation risk has been introduced in 2021, a comparison to previous year's exposure is not available. Claims and expense inflation risk arises in the currencies of the underlying liabilities.

Stress and scenario testing for inflation risk is undertaken in the annual risk assessment and the ORSA and includes stand-alone inflation and combination scenarios. The stress and scenario testing shows that the Company can absorb such scenarios and remain within stated risk appetite with respect to its solvency ratio.

# Description of how assets have been invested in accordance with the 'Prudent Person Principle'

The Company employs a prudent investment philosophy. It maintains a high quality, well-balanced and liquid portfolio having a total return investment objective, achieved through a combination of optimising current investment income and pursuing capital appreciation. The Company's total invested assets were €229.4 million at 31 December 2021 (2020: €150.6 million); refer to section D.1. of this report for a breakdown by asset type. From a risk management perspective, the Company allocates its invested assets into two categories: liability funds and capital funds.

For the Company's portfolio, diversification of risks contributes to achieving the risk and return objectives of the Company. The Company's investment policy distinguishes between liquid, high quality assets that support the Company's liabilities, and the more diversified, higher risk asset classes that may make up a portion of the Company's capital funds. While there will be years where investment risks achieve less than the risk-free rate of return, or potentially even negative results, the Company believes the rewards for assuming these risks in a disciplined and measured way will produce a positive excess return to the Company over time. Additionally, since investment risks are not fully correlated with the Company's insurance risks, this increases the overall diversification of the Company's total risk portfolio.

The Company's investments are managed by PartnerRe Asset Management Corporation (PRAM) subject to a management agreement. The allocation of the Company's investments are subject to the asset allocation plan set by the Board. Furthermore, PRAM is required to adhere to investment guidelines approved by the Board as to minimum ratings and issuer and sector concentration limitations.

Liability funds represent invested assets supporting the net insurance liabilities, and are invested primarily in investment grade fixed income securities and cash and cash equivalents. The preservation of liquidity and protection of capital are the primary investment objectives for these assets.

Liability funds are invested in a way that generally matches them to the corresponding liabilities (referred to as asset-liability matching) in terms of both duration and major currency composition to provide the Company with a natural hedge against changes in interest and foreign exchange rates. In addition, the Company may use certain approved derivatives to further protect against changes in interest and foreign exchange rates.

Capital funds represents capital of the Company in excess of liability funds and may be invested in a diversified portfolio with the objective of maximising investment return, subject to prudent risk constraints. Capital funds may contain asset classes typically viewed as offering a higher risk and higher return profile. Capital funds may be invested in investment grade fixed income securities. The Company's investment strategy allows for the use of derivative instruments, subject to strict limitations and for the purpose of managing and hedging currency risk, market exposure and portfolio duration, hedging certain investments, mitigating the risk associated with underwriting operations, or enhancing investment performance that would be allowed under the Company's investment policy if implemented in other ways.

The Company through its management agreement, its investment risk policy, asset allocation plan and investment guidelines ensures that management and reporting of its investment portfolio is suitable for the nature and size of the risks of the Company and are subject to portfolio diversification guidelines which include issuer and sector concentration limitations. Processes and procedures ensure that the Company can properly identify, measure, monitor, manage, control and report on its portfolio.

Quarterly reporting is presented to the Risk and the Audit Committees of the Board. If a new asset class is proposed, the Company assesses the change including the potential impact on credit quality, liquidity and capital requirements.

In respect of liquidity, the Company's fixed income portfolio is primarily invested in high quality, investment grade securities which are characterised by relatively low levels of credit risk and relatively high liquidity. As set out in C.4, the Company ensures it holds sufficient liquid securities to meet excess liquidity after stress and downgrade requirements of its RAF

In respect to capital funds and if permitted under the Company's asset allocation plan, and in which case subject to the set out limits therein, the Company may invest a portion of its portfolio in fixed income securities that are below

investment grade as well as other interest paying investments such as fixed income type mutual funds, notes receivable, loans receivable, private placement bond investments, derivative exposure assumed and other specialty asset classes. These securities generally pay a higher rate of interest and have a higher degree of credit or default risk. These securities may also be less liquid in times of economic weakness or market disruptions.

# C.3. CREDIT RISK

Credit risk is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to discharge an obligation. Ownership of financial assets involves the risk that counterparties may be unable to meet the terms of their agreements.

Credit risk is referred to as counterparty default risk in the SCR calculation. The SCR for counterparty default risk, using the Standard Formula, on a pre-diversified basis is €16.2m (2020: €15.0m), which is 28% (2020: 28%) of the BSCR before diversification.

The Company measures credit risk with metrics based on SCR, credit ratings, single-counterparty exposures and the solvency ratio of Group-internal counterparties. The overall approach to risk measurement has remained unchanged. The Company's RAF includes key risk indicators for credit risk with internal and external reinsurers which is monitored in respect of compliance with stated risk appetite on a quarterly basis in the Risk Committee and Board.

The Company's exposure to credit risk arises mainly from cash and cash equivalents deposited with banks, investments in fixed income and other financial securities, insurance balances recoverable on ceded insurance and receivables from MGAs. The main exposures are related to reinsurance agreements with related companies of the Group, rated A+.

The Company uses reinsurance agreements to reduce its exposure on certain underwriting risks assumed and to mitigate the effect of any single major event or the frequency of medium-sized events, thereby exposing the Company to credit risk with reinsurers. Reinsurers must be approved based on their financial condition and business practices, with stability, solvency and credit ratings being important criteria. Limits per reinsurer are put in place and monitored to mitigate counterparty credit risk. The Company manages its credit exposure to reinsurers by generally selecting reinsurers which have a credit rating of A- or higher. In certain cases where an otherwise suitable reinsurer has a credit rating lower than A-, the Company generally requires the posting of collateral and letters of credit as a condition to it entering into a reinsurance agreement.

Credit risk related to cash, cash equivalents and investments is primarily mitigated by investing only in counterparties with strong credit ratings and managing concentration risk by limiting the aggregate exposure to any individual counterparty through the use of appropriate limits.

The creditworthiness of counterparties is monitored on an on-going basis. The Company uses, where available, rating information provided by S&P and A.M. Best to ensure a consistent view on the financial condition of external parties.

Stress and scenario testing for credit risk is undertaken in the annual risk assessment and the ORSA. The stress and scenario testing shows that the Company relies on related companies of the Group remaining going concern. The Company considers residual credit risk with related companies of the Group as remote.

#### C.4. LIQUIDITY RISK

Liquidity risk is the risk of not being able to meet financial obligations as and when they fall due, including obligations to cedants, internal counterparties and other third parties.

The Company measures liquidity risks by evaluating a pre-defined liquidity crisis scenario unfolding over a time horizon of one year and comprising of a combination of a financial market crisis, insurance losses with rapid payout, collateralisation of new insurance business and downgrade. The overall approach to risk measurement has

remained unchanged. The Company's RAF includes a key risk indicator for liquidity risk which is monitored in respect of compliance with stated risk appetite on a quarterly basis in the Risk Committee and Board.

The Company mitigates liquidity risk by holding a large part of its investments in investment grade standard fixed income securities and other liquid instruments.

The Company is exposed to liquidity risk mainly through claims arising from its insurance contracts and a difference in timing between claims payments and recoveries from reinsurance ceded. Liquidity risk may also arise from a decline in disposal value of the Company's assets in financial market crises, from collateral calls on collateralized business and from a reduction in liquidity inflows. Liquidity risk has remained within approved risk appetite during 2021.

Stress and scenario testing for liquidity risk is undertaken in the quarterly liquidity stress test as set out above. The stress and scenario testing shows that the Company remains in a positive excess liquidity position after the scenario considered in the liquidity stress test.

# **Expected Profit Included in Future Premium**

The Expected Profit Included in Future Premium (EPIFP) was €47.5 million at 2021 (2020: €26.3 million). The EPIFP represents the difference between the premiums from future exposure arising from contracts that the Company is obligated to as at 31 December 2021 and the expected acquisition costs, losses and expenses relating to these premiums. A lapse rate was assumed on in-force contracts relating to future additional premium and on premium relating to business bound but not yet incepted at the closing date. The calculation was discounted using Solvency II yield curves.

The EPIFP by line of business was as follows as at 2021 and 2020:

	2021	2020
Line of business	€'000	€'000
Marine, aviation and transport	3,955	1,771
Fire and other damage to property	17,918	14,759
General liability	25,587	9,693
Credit and suretyship	38	35
Total	47,497	26,258

# C.5. OPERATIONAL RISK

Operational risks include, but are not limited to, failures or weaknesses in financial reporting and controls, regulatory non-compliance, fraud, breach of information technology and data privacy security, disaster recovery planning and reliance on third party vendors.

The Company categorises its operational risks as follows: IT (including cyber risk), business disruption, process and execution management, outsourcing, legal and compliance, fraud and human resources. The Company also monitors branch matters, strategic and emerging risks which may relate to operational risks.

IT (including cyber risk) risk relates to the potential of a successful cyber-attack with significant business impact which could lead to financial losses and operational disruption. Business disruption risk relates to business continuity and emergency management. Process and execution management risk relates to underwriting and reporting processes. Outsourcing risk is financial, operational, regulatory or reputational risk related to the outsourcing of processes or services within PartnerRe Group or to third parties. Legal and compliance risks relate to regulatory obligations and legal risks in relation to the Company's business activities. Fraud risk relates to intentionally deceptive actions potentially resulting in financial statement fraud, misappropriation of assets, claims or tax fraud. Human resources risk relates to the risk of strategic or financial underachievement due to a lack of critical skills.

The Company manages and mitigates operational risks through policies and guidelines setting out appropriate procedures and internal controls and the periodic assessment of adherence to these procedures and controls by Internal Audit. Operational risk is monitored and reported in standardised form to management, the Risk Committee and the Board. Matters are escalated to the Board as required and mitigating actions are assigned to bring elevated risks back within tolerance.

There were no material weaknesses identified in any of the operational risk categories.

# C.6. OTHER MATERIAL RISKS

# Strategic risks

Strategic risks are discussed with the General Manager, the Legal Entity Management Team, the Board and the Group and include the direction and governance of the Company as well as its response to external factors faced by the insurance industry such as changes in regulation, competitive structure and macroeconomic, legal and social trends. Strategic risks are managed by strong governance procedures, including a robust system of processes and internal controls.

Strategic risks are included in the Company's risk assessment process and are monitored on a quarterly basis with onward reporting as needed to the Risk Committee and the Board.

The Company's RAR has identified Brexit and Group risks as material strategic risks. Climate change is also classified as a strategic risk.

# **Brexit impacts**

The UK left the EU in January 2020. During the Temporary Permission Regime (TPR) (2021 to end of 2023), the operational burden within the UK for insurance companies will increase gradually. During the TPR, access to the UK market is fully preserved as the Company's UK branch will be deemed to have local UK authorisation. The deemed authorisation will apply for a maximum period of 3 years from 1 January 2021.

Regulatory reporting risk and other operational risks in relation to the obligations of the Company's UK branch are mitigated by a dedicated project with appropriate governance structures and reporting to the Board.

#### **Group risks**

The Company is exposed to Group risks of financial and operational nature. Financial risks relate mostly to the Company's reliance on Group affiliates for reinsurance which implies counterparty and liquidity risk and are assessed as low due to the high credit rating and solvency ratios of the relevant affiliate companies. Group risks of operational nature relate to the embedding of Company processes in Group processes and the provision of services by affiliate companies.

# Climate change risks

Climate change gives rise to financial risks through three main channels: physical risks, transition risks and liability risks. Physical risks relate to higher frequency and severity of extreme weather events (such as floods, storms, wildfires, heat waves), persistent shifts in climate (such as precipitation/drought and higher temperatures) and rise of sea levels. Transition risks relate to the process of adjustment (such as regulatory and legislative changes, changing consumer preferences, reputational risk) which could lead to a reassessment of asset values and loss of business. Liability risks relate to climate-related claims under liability policies and potential claims for failing to manage, mitigate or disclose climate-related risks, for example in professional lines.

The Company is exposed to increased tropical cyclone activity on its North American specialty lines portfolio. With current knowledge, the Company is not considered to be significantly exposed to changes in severity or frequency of other natural catastrophe perils such as wildfire or flood. Policy action, in particular a disorderly transition, and changes in consumer attitudes could result in loss of business in the lines of business engineering and aviation. The Company has assets potentially exposed to transition risks in line with the financial industry average.

# Reputational risks

Reputational risk is the risk of potential loss through deterioration of the Company's reputation or standing due to a negative perception among customers, counterparties, shareholders or supervisory authorities. Reputational impacts tend to be an outcome of other risk types materialising; therefore, managing each type of risk serves to manage reputational risk.

Reputational risks are included in the Company's risk assessment process and are monitored on a quarterly basis with onward reporting as needed to the Risk Committee and the Board. No significant reputational risks for the Company have been identified.

# **Emerging risks**

Emerging risks are subject to the risk identification, assessment, monitoring and reporting as set out in section B.3 in this report.

#### **C.7. ANY OTHER INFORMATION**

There is no other material information in respect of the Company's risk profile.

#### **D. VALUATION FOR SOLVENCY PURPOSES**

#### D.1. ASSETS

		2021		2020			
	Solvency II Valuation	IFRS Valuation	Variance Solvency II v IFRS	Solvency II Valuation	IFRS Valuation	Variance Solvency II v IFRS	
	€'000	€'000	€'000	€'000	€'000	€'000	
Fixed income securities	212,088	212,088	_	121,157	121,157		
Collective Investment Undertakings		_	_	3,050	3,050		
Cash and cash equivalents	15,990	15,990	_	25,163	25,163	_	
Deposits other than cash equivalents	1,082	1,082	_	1,082	1,082	_	
Reinsurance recoverable	251,187	464,943	(213,756)	174,040	287,175	(113,135)	
Reinsurance receivables	6,651	6,651	_	4,393	4,393	_	
Insurance and intermediaries receivable	5,417	5,417	_	24,060	24,060	_	
Receivables (trade, not insurance)	4,310	4,310	_	1,909	1,909		
Deferred tax asset	1,798	733	1,065	1,896	410	1,486	
Deposits to cedants	193	193	_	178	178		
Other assets	18	18	_	18	18		
Total	498,734	711,425	(212,691)	356,946	468,595	(111,649)	

#### **Fixed income securities**

Fixed income securities are generally priced by independent pricing services and brokers. Each pricing source will have its own proprietary method to determine fair value which will incorporate information such as credit spreads, interest rate data, market news and an option adjusted spread. The Company will classify these assets as Quoted Market Price in Active Markets for Similar Assets (QMPS) for valuation purposes under Solvency II. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. There is no variance in valuation when compared to the IFRS Balance Sheet.

# Cash and cash equivalents

Cash and cash equivalents are carried at face value in the IFRS balance sheet as best representing their fair value. Since the underlying currency of the cash is freely tradeable the Company considers them to be classified as Quoted Market Price in Active Markets for the Same Assets (QMP) for valuation purposes under Solvency II. There is no variance in the valuation when compared to the IFRS Balance Sheet.

# **Collective Investment Undertakings**

The collective investment undertaking in money market funds has available prices received from independent pricing sources based on quoted prices in active markets. Accordingly, these are classified as QMP for valuation purposes under Solvency II. There is no variance in valuation when compared to the IFRS Balance Sheet.

#### Reinsurance recoverables

Reinsurance recoverables (reinsurance share of technical provisions) reflect the estimated amounts which are recoverable under reinsurance contracts. Reinsurance recoverables on the Solvency II balance sheet are calculated in a manner consistent with the best estimate liabilities. For further details of the valuation of reinsurance recoverables, refer to section D.2. Non-Life Technical Provisions.

#### Reinsurance receivables

Reinsurance receivables are amounts owed under reinsurance contracts and are valued at their account balance which equates to fair value due to the short-term nature of the balance. There is no variance in the valuation when compared to the IFRS Balance Sheet.

#### Insurance and intermediaries receivables

Insurance and intermediaries receivables are amounts owed under insurance and assumed reinsurance contracts and are valued at their account balance which equates to fair value due to the short-term nature of the balances. There is no variance in valuation when compared to the IFRS Balance Sheet.

#### Receivables (trade, not insurance)

Receivables (trade, not insurance) are amounts owed by Group companies, business partners etc., and are generally valued at their account balance. Most balances are current items and are collected in a short timeframe so the face value is deemed equal to fair value.

#### **Deferred tax asset**

Deferred tax assets are valued based on the tax impact of the temporary difference between the values ascribed to assets recognised and valued in accordance with Solvency II rules and the values ascribed to assets as recognised and valued for tax purposes. Deferred tax assets are also recognised from the carry forward of unused tax credits and the carry forward of unused tax losses.

Deferred tax assets are recognised only to the extent that it is probable that future tax profit will be available against which the deferred tax asset can be utilised, taking into account any legal or regulatory requirement on time limits relating to the carry forward of unused tax losses or credits. Deferred tax assets are not discounted. The difference between the values of the Solvency II Balance Sheet and the IFRS Balance Sheet are due to the tax impact of valuation adjustments to other assets on the balance sheet.

# **D.2. TECHNICAL PROVISIONS**

Under Solvency II, the Technical Provisions (TPs) are determined as a discounted Best Estimate Liability (BEL) augmented by a risk margin (RM). The BEL includes claims and premium provisions and is defined as the mean of the full range of possible future outcomes on a discounted cash flow basis, taking into account the time value of money, and with all existing contracts being valued, whether they have already incepted or are yet to incept. The RM is a component of the TPs representing the current values of all costs-of-capital that will be determined yearly until the existing liabilities are fully concluded.

In valuing the Company's technical provisions, none of the following have been applied:

- The matching adjustment referred to in Article 77b of Directive 2009/138/EC (the Directive)
- The volatility adjustment referred to in Article 77d of the Directive
- The transitional risk-free interest rate-term structure referred to in Article 308c of the Directive
- The transitional deduction referred to in Article 308d of the Directive.

# **Technical Provisions by Line of Business**

The following table outlines the Solvency II TPs by line of business, as at 31 December 2021 and 2020:

2021	Claim Provision	Premium Provision	Recoverables from Reinsurance contracts	Risk Margin	Total Technical Provisions net of Recoverables
Line of Business	€'000	€'000	€'000	€'000	€'000
Marine, aviation and transport	46,873	83	(39,167)	1,939	9,728
Fire and other damage to property	109,926	(8,620)	(86,872)	1,737	16,171
General liability	106,837	37,473	(124,941)	5,607	24,976
Credit and suretyship	265	<u>—</u>	(208)	38	95
Total	263,901	28,936	(251,188)	9,321	50,970

2020	Claims Provisions	Premium Provisions	Recoverables from Reinsurance contracts	Risk Margin	Total Technical Provisions net of Recoverables
Line of Business	€'000	€'000	€'000	€'000	€'000
Marine, aviation and transport	43,459	3,517	(37,796)	1,739	10,919
Fire and other damage to property	59,825	(5,482)	(46,763)	1,947	9,527
General liability	74,612	30,368	(89,259)	3,946	19,667
Credit and suretyship	267	(7)	(222)	27	65
Total	178,163	28,396	(174,040)	7,659	40,178

## **Best Estimate Liability**

The BEL is determined gross of the amounts recoverable from reinsurance contracts, which are held separately on the asset side of the Solvency II balance sheet. The valuations of best estimate provision for claims outstanding and for unearned premium are carried out separately. Projections are performed separately for the inwards and ceded business but the bases, methodology and assumptions are considered consistently.

All data is converted to euro before modelling, but the location in which the business was written and original currency of the contracts is considered for the purpose of granularity and discounting. In calculating the BEL, risks are grouped homogeneously and considered by region at SII line of business, as defined under SII. The calculation accounts for the lifetime of existing obligations within contract boundaries. There is no deviation in methodology between lines of business.

The BEL captures the best estimation of future cashflows relating to existing obligations for each of the claims provision and premium provision independently. Premium, losses, expenses and costs are considered separately and all cashflows are discounted using prescribed EIOPA risk-free yield curves for SII reporting.

In accordance with Solvency II technical specifications, the future administrative expenses, investment management expenses and claims management expenses expected to be incurred in the future related to business bound as of the valuation date have been included. The expenses were estimated based on an analysis of the planned 2021 expenses. The expenses estimated which relate to existing business, including business incepted post-technical cutoff date (PostTCO), and Bound but Not Incepted (BBNI) business were calculated in total and allocated across lines of business and between the claims and premium provision in line with expected future payments.

The existing data sets used to estimate the BEL will not be complete as they only contain events which have already been experienced in the time frame covered by the data. An ENIDs (Events not in Data) loading is applied, which represents the gap between the existing data set and a complete data set.

#### Recoverables from reinsurance contracts

The projection of reinsurance recoverables is performed separately to the projection of the inwards business. As most of the ceded business is predominantly proportional the bases, methodology and assumptions are consistent with those for inwards business.

An additional adjustment is made by calculating a counterparty default adjustment for ceded loss reserves in order to take account of the possible shortfall on expected recovery from reinsurers.

## **Material Changes to Assumptions during 2021**

There have been no material changes to assumptions underlying the BEL calculation during 2021.

#### **Risk Margin**

The RM is calculated by determining the cost of providing an amount of Eligible Own Funds equal to the Solvency Capital Requirement (SCR) necessary to support the insurance obligations over the lifetime thereof. The rate used in the determination of the cost of providing that amount of Eligible Own Funds is called cost-of-capital rate and equals 6%.

The RM is first calculated for the whole business, allowing for diversification between lines of business. In a second step, the RM is allocated to lines of business. The allocation reflects the contributions of the lines of business to the SCR of the reference undertaking over the lifetime of the obligations.

The RM is considered on a standalone basis such that the contribution of a line of business is calculated under the assumption that the other business does not exist.

## Level of uncertainty

The IFRS reserves calculated by the Company are estimations, based on various sources of information and the use of actuarial techniques. Additional assumptions guide the adjustments to calculate the Solvency II BEL from the IFRS reserves, such as priced profitability of unearned premium. The ultimate outcome of these estimations may materially differ from what is selected for the Solvency II BEL. The deviations compared to current BEL can relate, amongst others, to:

- The level of future inflation compared to current expectations;
- The evolution in case law for future claims following a change in court awards;
- The current assumptions about market environment and pricing conditions happen to be wrong; and
- Future claim activity differs from what was anticipated, due to the nature of the business covered.

# Comparison with IFRS reporting

The main differences between the IFRS and Solvency II valuation bases are summarised as follows:

- IFRS reserves includes an explicit margin for uncertainty which should not be included in the Solvency II TPs. Conversely, Solvency II TPs include the risk margin which is not included in the IFRS reserves.
- IFRS reserves are calculated on an undiscounted basis, whereas the cash-flows used to determine the Solvency II TPs are discounted using risk-free rates provided by EIOPA.
- IFRS reserves considers actual historical experience to date. Under Solvency II, we need to allow for
  possibilities beyond this to consider the full range of possible future outcomes, including experience which
  may not be captured within the historical data.

IFRS UPR is replaced with a best estimate of the premium provision which takes into account the expected
cost of claims and expenses relating to the unearned period as well as expected future premium payable
(net of acquisition cost and commissions); this is likely to produce a lower premium provision. The premium
provision also considers bound but not incepted (BBNI) contracts, which is not required in the IFRS
calculation.

The following table shows the difference between the Gross IFRS reserves in the IFRS financial statements and the technical provisions under Solvency II:

2021	Best Estimate Liability	Risk Margin	Solvency II Technical Provision	Gross IFRS Technical Reserve	Difference
Line of Business	€'000	€'000	€'000	€'000	€'000
Marine, aviation and transport insurance	46,956	1,939	48,895	62,691	(13,796)
Fire and other damage to property insurance	101,307	1,737	103,044	150,643	(47,599)
General liability insurance	144,310	5,607	149,917	310,810	(160,893)
Credit and suretyship	265	38	303	447	(144)
Total	292,838	9,321	302,159	524,591	(222,432)
-	Best Estimate	Risk Margin	Solvency II Technical	Gross IFRS Technical	Difference

2020	Best Estimate Liability	Risk Margin	Solvency II Technical Provision	Gross IFRS Technical Reserve	Difference
	€'000	€'000	€'000	€'000	€'000
Marine, aviation and transport insurance	46,977	1,739	48,715	57,825	(9,110)
Fire and other damage to property insurance	54,343	1,947	56,290	89,503	(33,213)
General liability insurance	104,980	3,946	108,926	178,796	(69,870)
Credit and suretyship	260	27	287	459	(172)
Total Technical Provisions for all lines of business	206,560	7,659	214,218	326,583	(112,365)

# **D.3. OTHER LIABILITIES**

This section outlines the valuation basis and comparison for other liabilities excluding TPs, as at 31 December 2021 and 2020. For reconciliation purposes, the categories listed below for the IFRS balance sheet have been aligned to those of the Solvency II balance sheet.

		2021		2020				
	Solvency II Valuation	IFRS Valuation	Variance Solvency II v IFRS		IFRS Valuation	Variance Solvency II v IFRS		
	€'000	€'000	€'000	€'000	€'000	€'000		
Reinsurance payables	44,672	44,672	_	13,081	13,081	_		
Insurance and intermediaries payable	34,681	34,681	_	16,379	16,379	_		
Payables (trade, not insurance)	1,729	1,729	_	1,152	1,152	_		
Other liabilities	22	22	_	31	36	(5)		
Total	81,104	81,104	_	30,643	30,648	(5)		

#### Reinsurance payables

Reinsurance payables are amounts due under reinsurance contracts and are valued at their account balance which equates to fair value due to the short-term nature of the balances. There is no variance in valuation when compared to the IFRS Balance Sheet.

#### Insurance and intermediaries payable

Insurance and intermediaries payable are amounts due under insurance and assumed reinsurance contracts and are valued at their account balance which equates to fair value due to the short-term nature of the balances. There is no variance in valuation when compared to the IFRS Balance Sheet.

# Payables (trade, not insurance)

Payables (trade, not insurance) are amounts due to employees, Group companies, business partners, etc., and are generally valued at their account balances. Most balances are current items and are collected in a short timeframe, so the face value is deemed to equal fair value. There is no variance in valuation when compared to the IFRS Balance Sheet.

#### **D.4. ALTERNATIVE METHODS FOR VALUATION**

In certain circumstances for some assets and liabilities an alternative method of valuation is used to determine the value. These methods are applied where the valuation is not possible to determine using the default method i.e. QMP or QMPS. All valuation methods applied have been explained within the relevant sections in D.1. Assets and D.3. Other liabilities.

#### D.5. ANY OTHER INFORMATION

There is no other material information regarding the valuation of assets and liabilities for solvency purposes.

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#### **E. CAPITAL MANAGEMENT**

#### **E.1. OWN FUNDS**

#### **Nature of capital**

The capital (Solvency II Own Funds) of the Company consists of ordinary shares, capital contributions from the Group, retained earnings and reserves.

The ordinary shares issued to PartnerRe Holdings Europe Limited (PRHEL), fulfil the criteria in that they:

- · Are issued directly by the Company with the prior approval of its shareholders; and
- Entitle the owner to claim on the residual assets of the Company in the event of a winding up.

The various capital contributions from other Group companies are irrevocable transfers from the Group to the Company and, as such, do not impose any obligations on the Company. Therefore, all of the capital of the Company is classified as Tier 1 Basic Own Funds in the context of Solvency II, except for net deferred tax assets which are classified as Tier 3 capital, which cannot be used to cover the Minimum Capital Ratio (MCR). There are currently no ancillary Own Fund items. There are no restricted Tier 1 or Tier 2 items included in Solvency II Own Funds. The Company has not applied the transitional arrangements referred to in Articles 308b(9) and 308b(10) of the Directive.

The time horizon used for business planning is three years, which aligns with the ORSA and the business plan.

The following table shows a breakdown of the total Solvency II Own Funds as at 31 December 2021 and 2020:

	Tier 1 - unrestricted funds	Tier 3	Total
2021	€'000	€'000	€'000
Ordinary share capital	2,249	_	2,249
Reconciliation reserve	(39)	_	(39)
Net deferred tax assets	_	1,798	1,798
Other Own Funds approved by the supervisory authority	111,463		111,463
Total Solvency II Own Funds	113,673	1,798	115,471
Total eligible own funds to meet SCR	113,673	1,798	115,471
Total eligible own funds to meet the MCR	113,673		113,673
	Tier 1 - unrestricted funds	Tier 3	Total
2020	€'000	€'000	€'000
Ordinary share capital	2,249	_	2,249
Reconciliation reserve	(3,525)	_	(3,525)
Net deferred tax assets	_	1,896	1,896
Other Own Funds approved by the supervisory authority	111,463		111,463
Total Solvency II Own Funds	110,187	1,896	112,083
Total eligible own funds to meet SCR	110,187	1,896	112,083
Total eligible own funds to meet the MCR	110,187		110,187

The reconciliation reserve is made up of IFRS retained earnings, IFRS currency translation reserve and the valuation differences between IFRS and Solvency II. The reconciliation reserve changed during the year as a result

of the profit earned during the year, the foreign exchange gains recognised in the currency translation reserve and the change in Solvency II valuation differences.

The other own funds approved by the supervisory authority are equal to the additional paid-in capital of the Company.

The Company did not make any dividend payments to its shareholder in 2021 or 2020.

# **Capital Management**

The Company's objectives when managing capital are:

- To safeguard the Company's ability to continue as a strong going concern so that it can continue to provide returns for its stakeholders and pay insurance losses reported by policyholders;
- To ensure that the Company is a well capitalised risk insurer for its policyholders; and
- To comply with the insurance capital requirements required by the CBI.

The capital position of the Company is monitored on a quarterly basis jointly by the Head of Finance and the CRO and is reported to the Risk and Audit Committees as well as the Board on a quarterly basis.

Any dividend payments must be approved by the Board and will take account of the short-term and long-term interests of shareholders as well as maintaining a balance between the interests of shareholders and other key stakeholders, namely policyholders and regulators.

In particular, no distribution of dividends will compromise the ability of the Company to meet its current or future commitments to policyholders. In the context of Solvency II, no distribution of dividends shall lead to the Company failing to comply with the Solvency Capital Requirement (SCR) (or such higher capital requirement as the Board may determine, from time to time).

#### Reconciliation of Solvency II Own Funds to IFRS Shareholders' Equity

The following table compares shareholders' equity from the Company's IFRS financial statements to the Solvency II Own Funds as at 31 December 2021 and 2020:

	2021	2020
	€'000	€'000
IFRS Shareholders' Equity	121,674	121,003
Revaluation of net non-life technical provisions	(7,268)	(10,411)
Revaluation of assets and other liabilities	1,065	1,491
Solvency II Own Funds	115,471	112,083

See section D.2 of this report for a detailed explanation of the differences in valuation of the net non-life TPs.

The difference between assets and other liabilities arises from the difference in deferred tax balances due to the tax impact of the net non-life TPs valuation adjustments.

A detailed line-by-line Solvency II balance sheet is provided in the Quantitative Reporting Template (QRT) number SE.02.01.02 in the annex to this report.

# E.2. SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

The amount of the Company's SCR and MCR at the end of the reporting periods is €54.1 million and €13.5 million, respectively.

The table below shows the components of the SCR (using the Standard Formula) as at 31 December 2021 and 2020:

	2021	2020
	€'000	€'000
Sum of risk components	58,331	54,544
Market risk	12,675	15,449
Counterparty default risk	16,156	15,025
Non-life underwriting risk	29,500	24,070
Diversification effects	(12,967)	(13,223)
BSCR	45,364	41,321
SCR operational risk	8,785	6,197
SCR	54,149	47,518
Solvency II Own Funds	115,471	112,083
Ratio of Eligible Own Funds to SCR	213%	236%

The decrease in the Ratio of Eligible Own Funds to SCR is due to an overall increase in SCR year on year.

The SCR has increased by €6.6 million since 2020 for the following reasons:

- Counterparty default risk has increased by €1.1 million (before diversification) due to an increase in recoverable balances and risk mitigation effect,
- Non-life underwriting risk has increased by €5.4 million (before diversification) due to an increase in lapse risk, non-life catastrophe risk and premium and reserve risk,
- Operational risk has increased by €2.6 million due to the increase in the Best Estimate Liability (BEL),
- Reduction in the diversification effects, offset by;
- Market risk has decreased by €2.8 million (before diversification) due to improved currency matching of assets and liabilities, partly offset by an increase in investments in corporate bonds.

The SCR calculation is based on the aggregation of the different sub-modules of the SCR that have been calculated by the various departments responsible.

Risk-mitigation techniques (such as reinsurance) are taken into account for the calculation of the different sub-modules. The SCR of the different sub-modules are net of risk-mitigation techniques and the impact of these techniques from a SCR point of view is dealt with in the Counterparty risk module.

The Company applies the following simplifications:

- Calculation of risk mitigation effect of risk mitigation techniques and the risk adjusted value of collateral within counterparty default risk
- Evaluation of fire risk capital requirement within non-life underwriting risk.

The Company has not used any undertaking-specific parameters in calculating the SCR.

The table below outlines the components of the MCR as at 31 December 2021 and 2020:

	2021 €'000	2020 €'000
Linear MCR	7,392	5,599
SCR	54,149	47,518
MCR cap	24,367	21,383
MCR floor	13,537	11,880
Combined MCR	13,537	11,880
Absolute floor of the MCR	3,700	3,700
MCR	13,537	11,880

The MCR is calculated by applying the factors specified in the regulation to underlying drivers: premiums and best estimate liabilities by lines of business for non-life business. Ultimately, the MCR is driven by the floor calculated as 25% of the SCR. The increase in the MCR is therefore driven by the increase in SCR described above.

See template S.28.01.01 in the annex to this report for a further breakdown of the MCR calculation.

The Company was fully compliant with the MCR requirements throughout the reporting period.

# E.3. USE OF THE DURATION-BASED EQUITY RISK SUB-MODULE IN THE CALCULATION OF THE SOLVENCY CAPITAL REQUIREMENT

The Company has chosen not to use the duration-based equity risk submodule.

### E.4. DIFFERENCES BETWEEN THE STANDARD FORMULA AND ANY INTERNAL MODEL USED

For the calculation of the regulatory capital requirement, the Company uses the standard formula and does not use an internal model.

# E.5. NON-COMPLIANCE WITH THE MINIMUM CAPITAL REQUIREMENT AND NON-COMPLIANCE WITH THE SOLVENCY CAPITAL REQUIREMENT

There was no breach of the SCR or MCR over the reporting period.

#### **E.6. ANY OTHER INFORMATION**

There is no other material information regarding capital management.

Annex I SE.02.01.02 Balance Sheet 31 December 2021 €'000

		Solvency II
		value
Assets		C0010
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	ı
Deferred tax assets	R0040	1,798
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	ı
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	213,170
Property (other than for own use)	R0080	ı
Holdings in related undertakings, including participations	R0090	ı
Equities	R0100	-
Equities - listed	R0110	-
Equities - unlisted	R0120	-
Bonds	R0130	212,088
Government Bonds	R0140	105,575
Corporate Bonds	R0150	106,514
Structured notes	R0160	-
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	0
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	1,082
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
Loans and mortgages	R0230	-
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	251,187
Non-life and health similar to non-life	R0280	251,187
Non-life excluding health	R0290	251,187
Health similar to non-life	R0300	-
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	193
Insurance and intermediaries receivables	R0360	5,417
Reinsurance receivables	R0370	6,651
Receivables (trade, not insurance)	R0380	4,310
Own shares	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	15,990
Any other assets, not elsewhere shown	R0420	18
Total assets	R0500	498,734

		Solvency II
		value
Liabilities		C0010
Technical provisions - non-life	R0510	302,160
Technical provisions - non-life (excluding health)	R0520	302,160
TP calculated as a whole	R0530	-
Best Estimate	R0540	292,838
Risk margin	R0550	9,322
Technical provisions - health (similar to non-life)	R0560	-
TP calculated as a whole	R0570	-
Best Estimate	R0580	-
Risk margin	R0590	-
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-
Technical provisions - health (similar to life)	R0610	-
TP calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions - life (excluding health and index-linked and unit-linked)	R0650	-
TP calculated as a whole	R0660	-
Best Estimate	R0670	-
Risk margin	R0680	-
Technical provisions - index-linked and unit-linked	R0690	-
TP calculated as a whole	R0700	-
Best Estimate	R0710	-
Risk margin	R0720	-
Other technical provisions	R0730	
Contingent liabilities	R0740	22
Provisions other than technical provisions	R0750	-
Pension benefit obligations	R0760	-
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	-
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Debts owed to credit institutions resident domestically	ER0801	
Debts owed to credit institutions resident in the euro area other than domestic	ER0802	
Debts owed to credit institutions resident in rest of the world	ER0803	
Financial liabilities other than debts owed to credit institutions	R0810	-
Debts owed to non-credit institutions	ER0811	
Debts owed to non-credit institutions resident domestically	ER0812	
Debts owed to non-credit institutions resident in the euro area other than domestic	ER0813	
Debts owed to non-credit institutions resident in rest of the world	ER0814	
Other financial liabilities (debt securities issued)	ER0815	
Insurance & intermediaries payables	R0820	34,681
Reinsurance payables	R0830	44,672
Payables (trade, not insurance)	R0840	1,729
Subordinated liabilities	R0850	-
Subordinated liabilities not in basic own funds	R0860	-
Subordinated liabilities in basic own funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	-
Total liabilities	R0900	383,264
Expense of accepts over liabilities	D4000	115 470

R1000

115,470

Excess of assets over liabilities

			Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)							Line of business for: accepted non-proportional reinsurance								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	Total
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums written																		
Gross - Direct Business	R0110						20,594	91,458	177,522	208	-	-	-					289,782
Gross - Proportional reinsurance accepted	R0120	-	-	-	-	-	(282)	-	0	-	-	-	-					(282)
Gross - Non-proportional reinsurance accepted	R0130													-	-	-	-	-
Reinsurers' share	R0140	-	-	-	-	-	18,567	81,960	160,215	177	-	-	-	-	-	-	-	260,919
Net	R0200	-	-	-	-	-	1,745	9,498	17,308	31	-	-	-	-	-	-	-	28,581
Premiums earned																		
Gross - Direct Business	R0210						21,521	82,569	97,929	230	-	-	-					202,250
Gross - Proportional reinsurance accepted	R0220	-	-	-	-	•	405	-	0	-	-	-	-					405
Gross - Non-proportional reinsurance accepted	R0230													-	-	-	-	-
Reinsurers' share	R0240	-	-	-	-	-	19,941	73,485	87,491	196	-	-	-	-	-	-	-	181,112
Net	R0300	-	-	-	-	-	1,985	9,085	10,438	35	-	-	-	-	-	-	-	21,542
Claims incurred																		
Gross - Direct Business	R0310						18,054	65,924	48,768	(42)	-	-	-					132,704
Gross - Proportional reinsurance accepted	R0320	-		-	-	-	(1,072)	-	0	-	-	-	-					(1,072)
Gross - Non-proportional reinsurance accepted	R0330													-	-	-	-	-
Reinsurers' share	R0340	-	-		-	-	13,987	56,645	42,844	(34)	-	-	-	-	-	-	-	113,442
Net	R0400	-	-	-	-	-	2,994	9,279	5,924	(7)	-	-	-	-	-	-	-	18,190
Changes in other technical provisions			•	•														
Gross - Direct Business	R0410						-	-	-	-	-	-	-					-
Gross - Proportional reinsurance accepted	R0420	-			-	-	-	-	-	-	-	-	-					-
Gross - Non-proportional reinsurance accepted	R0430													-	-	-	-	0
Reinsurers' share	R0440	-			-	-	0	0	0	0	-	-	-	-	-	-	-	0
Net	R0500	-	-	-	-	-	0	0	0	0	-	-	-	-	-	-	-	0
Expenses incurred	R0550	-		-	-	-	(39)	548	4,026	4	-	-	-	-	-	-	-	4,539
Other expenses	R1200																	
Total expenses	R1300																	4,539

Annex I S.05.02.01 Premiums, claims and expenses by country 31 December 2021 €'000

		Home Country	Total Top 5 and home country		Top 5 countries (by amou	nt of gross premiums writ	ten) - non-life obligations	
	R0010			(US) United States	(GB) United Kingdom	(DE) Germany	(AU) Australia	(CA) Canada
		C0080	C0140	C0090	C0090	C0090	C0090	C0090
Premiums written								
Gross - Direct Business	R0110	244	277,070	230,900	30,695	6,130	5,633	3,468
Gross - Proportional reinsurance accepted	R0120	-	(44)	(37)	(7)	-	0	-
Gross - Non-proportional reinsurance accepted	R0130	-	-	-	-	-	-	-
Reinsurers' share	R0140	218	249,664	207,992	27,716	5,573	5,049	3,116
Net	R0200	25	27,362	22,871	2,972	557	584	352
Premiums earned								
Gross - Direct Business	R0210	149	188,035	142,222	29,876	6,261	5,522	4,004
Gross - Proportional reinsurance accepted	R0220	-	318	(37)	356	-	0	-
Gross - Non-proportional reinsurance accepted	R0230	-	-	-	-	-	-	-
Reinsurers' share	R0240	133	168,271	126,923	27,053	5,664	4,919	3,579
Net	R0300	17	20,082	15,262	3,179	597	603	424
Claims incurred								
Gross - Direct Business	R0310	96	118,066	92,677	17,116	1,879	5,793	505
Gross - Proportional reinsurance accepted	R0320	0	219	30	168	3,343.85	11	6
Gross - Non-proportional reinsurance accepted	R0330	-		-	=	The state of the s	T.	-
Reinsurers' share	R0340	79	102,028	79,886	15,106	1,555	4,977	424
Net	R0400	17	16,257	12,821	2,178	327	828	86
Changes in other technical provisions	•							
Gross - Direct Business	R0410	-		-	=	The state of the s	T.	-
Gross - Proportional reinsurance accepted	R0420	-	•	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	R0430	-	•	-	-	-	·	-
Reinsurers' share	R0440	-	•	-	-	-	-	-
Net	R0500	-	-	-	-	-	-	<u> </u>
Expenses incurred	R0550	1	4,493	3,273	1,158	(1)	43	19
Other expenses	R1200							
Total expenses	R1300		4,493					

Annex I S.17.01.02 Non-life Technical Provisions 31 December 2021 €'000

			Direct business and accepted proportional reinsurance						Accepted non-proportional reinsurance									
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non- proportional health reinsurance	Non- proportional casualty reinsurance	Non- proportional marine, aviation and transport reinsurance	Non- proportional property reinsurance	Total Non- Life obligation
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010																	
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050																	
Technical provisions calculated as a sum of BE and RM																		
Best Estimate																		
Premium provisions																		
Gross - Total	R0060	-		-			83	(8,620)	37,473	0	-		-	-		-	-	28,936
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	-	-	-	-		163	(7,157)	33,823	1	-	-	-	-			-	26,829
Net Best Estimate of Premium Provisions	R0150	-		-			(80)	(1,463)	3,650	(1)	-		-	-		-		2,107
Claims provisions				•				•					•			•		
Gross - Total	R0160	-		-	-		46,873	109,926	106,837	265	-		-	-		-	-	263,901
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	-	-	-	-		39,004	94,029	91,118	207	-	-	-	-			-	224,358
Net Best Estimate of Claims Provisions	R0250	-		-			7,869	15,897	15,719	58	-		-	-		-	-	39,543
Total Best estimate - gross	R0260	-	-	-	-		46,956	101,307	144,310	265	-	-	-	-				292,838
Total Best estimate - net	R0270	-		-	-		7,789	14,434	19,369	58	-		-	-		-		41,650
Risk margin	R0280	-		-	-		1,939	1,737	5,607	38	-	-	-	-		-	-	9,322
Amount of the transitional on Technical Provisions																		
TP as a whole	R0290																	
Best Estimate	R0300																	
Risk margin	R0310																	
Technical provisions - total				•									•					
Technical provisions - total	R0320	-	-	-	-		48,895	103,044	149,917	304	-	-	-	-		-	-	302,160
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	-	-	-	-		39,167	86,872	124,941	208	-	-	-	-		-		251,187
Technical provisions minus recoverables from reinsurance/SPV and Finite Re-total	R0340	-	-	-	-		9,728	16,171	24,977	96	-	-	-	-		-		50,973
																		<u>.</u>

Annex I
S.19.01.21
Non-life Insurance Claims Information
31 December 2021
€'000

# Gross Claims Paid (non-cumulative) - Development year

#### (absolute amount)

		-	1	2	3	4	5	6	7	8	9	10+
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100	$\times$	$\times$	$\times$	$\times$	$\sim$	X	$\times$	$\times$	X	$\times$	86
N-9	R0160	302	8,817	5,270	3,393	1,744	469	680	762	404	289	
N-8	R0170	1,084	21,568	15,234	4,713	3,061	3,088	1,683	3,528	433		
N-7	R0180	2,083	22,810	17,273	20,109	14,327	5,346	1,444	538			
N-6	R0190	3,294	26,013	39,662	25,552	13,912	10,212	2,908				
N-5	R0200	7,932	20,053	28,126	12,141	6,456	3,529					
N-4	R0210	4,036	24,597	22,859	17,179	9,039		='				
N-3	R0220	4,490	46,433	15,242	21,627							
N-2	R0230	132	14,268	8,907		='						
N-1	R0240	285	16,897		-							
N	R0250	840		-								

# Gross undiscounted Best Estimate Claims Provisions - Development year (absolute amount)

0	1	2	3	4	5	6	7	8	9	10+		
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300
Prior	R0100	$\langle$	$\langle$	$\langle$	$\langle$	$\langle$	$\langle$	$\times$	$\langle$	$\langle$	$\times$	8,303
N-9	R0160		-			13,578	9,052	3,827	2,604	1,637	1,624	
N-8	R0170		-		16,260	12,409	8,296	9,009	3,602	3,020		=
N-7	R0180		-	65,341	41,237	25,511	15,442	8,119	7,406			
N-6	R0190		102,723	75,109	54,509	29,944	10,790	10,141		='		
N-5	R0200	41,378	75,075	51,463	40,570	9,445	10,475					
N-4	R0210	49,002	75,105	58,134	26,402	18,402						
N-3	R0220	51,680	81,448	59,119	36,630							
N-2	R0230	22,647	48,508	47,329		=						
N-1	R0240	14,484	66,353		-							
N	R0250	61,729										

Gross Claims Paid (non-cumulative) - Current year, sum of years (cumulative)

		In Current year	Sum of years (cumulative)
		C0170	C0180
Prior	R0100	86	86
N-9	R0160	289	22,130
N-8	R0170	433	54,391
N-7	R0180	538	83,929
N-6	R0190	2,908	121,554
N-5	R0200	3,529	78,237
N-4	R0210	9,039	77,709
N-3	R0220	21,627	87,792
N-2	R0230	8,907	23,307
N-1	R0240	16,897	17,182
N	R0250	840	840
Total	R0260	65,093	567,156

TA/Non-cumulativ TA/Accumulated

Gross undiscounted Best Estimate Claims Provisions - Current year, sum of years (cumulative)

		Year end
		(discounted data)
		C0360
Prior	R0100	7,848
N-9	R0160	1,582
N-8	R0170	2,950
N-7	R0180	7,371
N-6	R0190	9,882
N-5	R0200	9,963
N-4	R0210	17,825
N-3	R0220	35,498
N-2	R0230	45,970
N-1	R0240	64,395
N	R0250	60,616
Total	R0260	263,901

#### Own funds

Own funds						
		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35		C0010	C0020	C0030	C0040	C0050
Ordinary share capital (gross of own shares)	R0010	2,249	2,249			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	(39)	(39)			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160	1,798				1,798
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	111,463	111,463			
Own funds from the financial statements that shall not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that shall not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	0				
Deductions					1	, ,
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	115,470	113,672			1,798
Ancillary own funds					Ī	
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	115,470	113,672			1,798
Total available own funds to meet the MCR	R0510	113,672	113,672			
Total eligible own funds to meet the SCR	R0540	115,470	113,672			1,798
Total eligible own funds to meet the MCR	R0550	113,672	113,672			
SCR	R0580	54,149				
MCR	R0600	13,537				
Ratio of Eligible own funds to SCR	R0620	213%				
Ratio of Eligible own funds to MCR	R0640	840%				
Reconciliation reserve	D0700	C0060 115,470				
Excess of assets over liabilities Own shares (held directly and indirectly)	R0700 R0710	115,470				
Foreseeable dividends, distributions and charges	R0720	0				
Other basic own fund items	R0730	115,509				
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds  Reconciliation reserve	R0740 R0760	(39)				
Expected profits		(00)				
Expected profits included in future premiums (EPIFP) - Life business	R0770	0				
Expected profits included in future premiums (EPIFP) - Non-life business  Total EPIFP	R0780 R0790	47,497 47,497				

Annex I
S.25.01.21
Solvency Capital Requirement - for undertakings on Standard Formula
31 December 2021
€'000

Article 112? (Y/N) Z0010 (2) Regular reporting

#### Basic Solvency Capital Requirement

		Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
		C0030	C0040	C0050
Market risk	R0010	12,675	12,675	-
Counterparty default risk	R0020	16,156	16,156	-
Life underwriting risk	R0030	-	-	-
Health underwriting risk	R0040	-	-	-
Non-life underwriting risk	R0050	29,500	29,500	-
Diversification	R0060	(12,967)	(12,967)	
Intangible asset risk	R0070	-	•	
Basic Solvency Capital Requirement	R0100	45,364	45,364	

Calculation of Solvency Capital Requirement	_	C0100
Operational risk	R0130	8,785
Loss-absorbing capacity of technical provisions	R0140	-
Loss-absorbing capacity of deferred taxes	R0150	-
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	-
Solvency Capital Requirement excluding capital add-on	R0200	54,149
Capital add-on already set	R0210	-
Solvency capital requirement	R0220	54,149
Other information on SCR	_	
Capital requirement for duration-based equity risk sub-module	R0400	-
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	-
Total amount of Notional Solvency Capital Requirement for ring fenced funds	R0420	-
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	-
Diversification effects due to RFF nSCR aggregation for article 304	R0440	-

Annex I
S.28.01.01
Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity
31 December 2021
€'000

#### Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCRNL Result	R0010	7,392

	Net (of reinsurance/SPV) best estimate and TP	Net (of reinsurance) written premiums in the
	calculated as a whole	last 12 months
	C0020	C0030
Medical expense insurance and proportional reinsurance R0020	0	0
Income protection insurance and proportional reinsurance R0030	0	0
Workers' compensation insurance and proportional reinsurance R0040	0	0
Motor vehicle liability insurance and proportional reinsurance R0050	0	0
Other motor insurance and proportional reinsurance R0060	0	0
Marine, aviation and transport insurance and proportional reinsurance R0070	7,789	1,745
Fire and other damage to property insurance and proportional reinsurance R0080	14,434	9,498
General liability insurance and proportional reinsurance R0090	19,369	17,308
Credit and suretyship insurance and proportional reinsurance R0100	58	31
Legal expenses insurance and proportional reinsurance R0110	0	0
Assistance and proportional reinsurance R0120	0	0
Miscellaneous financial loss insurance and proportional reinsurance R0130	0	0
Non-proportional health reinsurance R0140	0	0
Non-proportional casualty reinsurance R0150	0	0
Non-proportional marine, aviation and transport reinsurance R0160	0	0
Non-proportional property reinsurance R0170	0	0

Overall MCR calculation		C0070
Linear MCR	R0300	7,392
SCR	R0310	54,149
MCR cap	R0320	24,367
MCR floor	R0330	13,537
Combined MCR	R0340	13,537
Absolute floor of the MCR	R0350	3,700
Minimum Capital Requirement	R0400	13,537