TWG Europe Limited Single Group Solvency and Financial Condition Report

Year ended 31 December 2022

ASSURANT®

Contents

I Terms and Acronyms

Term	Definition
AEI	Assurant Europe Insurance N.V.
AEL	Assurant Europe Life Insurance N.V.
AES	Assurant Europe Services B.V.
AFM	Autoriteit Financiele Markten
AGIL	Assurant General Insurance Limited
AGL	Assurant Group Limited, the UK holding company of AGIL and ALL
AGL Group	Assurant Group Limited and its subsidiaries
ALL	Assurant Life Limited
ARCC	Audit, Risk and Compliance Committee of Assurant Europe Group
Assurant, Inc. or AIZ	Assurant, Inc. the ultimate parent and controlling party of TWGE
Assurant Europe Group or AEG	AGL, TWGE, their respective subsidiaries and their related branches.
Board	The board of directors of TWGE, LGI and LGL
Brexit	The exit of the UK from the EU
CAE	Chief Audit Executive of Assurant, Inc.
DNB	De Nederlandsche Bank, Dutch local supervisor
EEA, EU	European Economic Area, European Union respectively
EIOPA	European Insurance and Occupational Pensions Authority
ELC	European Leadership Committee
ESC	Extended Service Contracts
FCA	Financial Conduct Authority in the UK
FINMA	Financial Market Supervisory Authority in Switzerland
GAAP	Generally Accepted Accounting Practices
IAS	Internal Audit Services
KFH	A Key Function Holder is one which has been identified by the PRA due to their influence within the system of governance
LGI	London General Insurance Company Limited
LGL	London General Life Company Limited
MCR	Minimum Capital Requirement, calculated as per the Solvency II Directive
MI	Management information
ORSA	Own Risk and Solvency Assessment
PRA	Prudential Regulation Authority in the UK
RMF	Risk Management Framework
RSR	Regular Supervisory Report
SCR	Solvency Capital Requirement, calculated as per the Standard Formula set out in the Solvency II Directive.
SFCR or Report	Solvency and Financial Condition Report (this document)
SII insurance firms	LGI and LGL
SMF	Senior Manager Function: role which has been identified by the PRA as having ‘significant influence’ on the management and conduct of a firm’s regulated activities. These are identified in a firm’s Management Responsibilities Map.
SoG	System of Governance
Solvency II or SII	The Solvency II Regulations of the EU as implemented in the UK by the PRA
TWGE	TWG Europe Limited, the UK holding company of LGI, LGL, AEI and AEL. The supervised insurance holding company under Solvency II
TWGE Group, the Group	TWGE and its subsidiaries, including LGI and LGL
TWGSL	TWG Services Limited

II Introduction

TWGE Group's Solvency and Financial Condition Report is prepared on a group basis and includes details of LGI and LGL, its UK insurance subsidiaries.

The TWGE Group also includes TWG Services Limited, which is the TWGE Group's UK services company that provides administration services to the Group and directly to clients, AEI and AEL, which write insurance business in Europe; and AES, which is the TWGE Group's Dutch services company that provides administration services to the Group and directly to clients in the European Union.

TWGE Group has a waiver from the Prudential Regulation Authority (PRA) allowing for the Group to produce a single SFCR (per Article 256 of Solvency II (Directive 2009/138/EC)).

LGI is based in the UK and writes business in the U. It also administers a small branch in Switzerland. LGL is based and writes business in the UK only. Both are authorised by the PRA and regulated by the Financial Conduct Authority and PRA. LGI and LGL are both subject to Solvency II regulations and are at times referred to in this document as the "SII insurance firms". The Group has no other UK entities that are subject to SII on a solo basis.

During the year, LGL successfully conducted an exercise to offer settlements to policyholders in return for voluntary cancellation of all in force policies on 30 September 2022. As such there are no active policies as at 31 December 2022. On 6 March 2023, LGL applied to the PRA and FCA to cancel the Company's Part 4A permission to carry on regulated activities.

The SFCR covers insurance and non-insurance business undertaken by TWGE Group as well as its two UK SII insurance firms, LGI and LGL. The information in this SFCR contains all the information that would otherwise have been included in the individual SFCRs. Unless specifically stated, references in this document to the TWGE Group should be assumed to apply equally to the SII insurance firms LGI and LGL.

AEI and AEL are regulated by their local supervisor De Nederlandsche Bank and are both subject to Solvency II regulations. AEI and AEL each report an SFCR separately and are therefore not included individually in this SFCR.

Assurant, Inc., the ultimate parent company, also owns one other non-life insurance entity in the UK, AGIL. This entity reports separately as part of the AGL Group and is not included in this SFCR.

The SFCR includes the public quantitative reporting templates at Appendix F of this document.

III Summary

TWGE Group is part of Assurant in the UK and Europe, Assurant Europe Group. AEG is a leading provider of automotive protection and mobile device solutions, with a focus on helping connected customers keep their lives running smoothly. AEG is part of the international business unit of Assurant, Inc. AIZ is a leading global provider of housing and lifestyle solutions that support, protect and connect major consumer purchases. Anticipating the evolving needs of consumers, Assurant partners with the world's leading brands to develop innovative products and services and to deliver an enhanced customer experience. As a group headed globally by a Fortune 500 company, Assurant partners with clients who are leaders in their industries to provide consumers with a range of protection products and services, and is among the market leaders in mobile device solutions; extended service contracts; vehicle protection services; renters insurance and lender placed homeowners insurance.

AGL, TWGE and their respective subsidiaries in the UK and EU are part of AEG.

The TWGE Group specialises in the underwriting, administration, and marketing of three core product lines:

- Appliance & Technology (A&T) - including warranty, theft, accidental damage and mobile phone insurance;
- Automotive extended warranty (Auto) - motor warranty, including Guaranteed Asset Protection (GAP) and ancillary insurances; and,
- Creditor - including unemployment, accident and life which is largely in run -off.

These are primarily consumer insurance products that are marketed across UK and the European Union. These are distributed on a Business-to-Business-to-Consumer basis through relationships with a range of motor dealers, manufacturers, retailers, financial institutions, and other distributors.

Products	Programme Solutions	Services
As people become more dependent on connectivity and technology, Assurant design, create, and manage various products that meet consumer needs within a connected and mobile life. Assurant's product philosophy is to continually innovate and deliver the type of solutions that meet consumers ever changing needs. All of Assurant's products are distributed by well-known brands throughout the UK and across Europe.	Assurant can create tailor-made product and service programmes across a range of consumer markets to offer an end-to-end packaged solution.	Assurant's propositions to clients are highly flexible and can range from a full "turn-key" solution through to an individual outsourced service. No two businesses are the same and Assurant believes that offering flexibility to suit our clients' needs, has always been, and will continue to be paramount to a successful business relationship.

Performance for the period

TWGE Group achieved a UKGAAP underwriting profit of £6,051k (2021: profit of £200k). LGI incurred a UK GAAP underwriting loss of £1,757k (2021: a loss of £4,325k) and LGL an underwriting profit of £97k (2021: loss of £154k).

Further details are provided in Section A.

Risk Management

As a provider of insurance products and services to a variety of corporate and individual clients, risk management is an integral part of TWGE Group's business processes.

The risk strategy is owned by the Board, and it is the Board's responsibility to ensure that the business strategy and risk strategy do not diverge. The Risk Function has responsibility to report divergence to the Audit, Risk and Compliance Committee together with the appropriate recommendations, including risk mitigation, which could include reassessing risk appetite.

TWGE Group employs a comprehensive RMF that includes a full range of policies, procedures, measurement, reporting and monitoring techniques to ensure that the risk exposures that arise from operating the Group's business are appropriately managed.

All employees are required to follow the RMF and risk management policies and procedures with training, communications and collaborative meetings with the Risk function to support the requirement.

The Risk function is responsible for overseeing implementation of the risk strategy and challenging the risks inherent within the business strategy by engaging with the Risk Accountable Executives, Risk Owners and Risk Co-Ordinators in their risk management and mitigation activities.

The main risks TWGE Group and LGI are exposed to are underwriting risk, inherent in the nature of their insurance business, followed by market risk, arising from investments and technical provisions, and credit risk due to counterparty default.

As LGL no longer has insurance liabilities or investments, its only remaining risk is counterparty default.

Capital and Solvency

TWGE Group, LGI and LGL calculate their SCR using the Standard Formula. Own Funds, including the calculation of technical provisions, are calculated based on the valuation requirements set out in the SII Directive.

The capital positions of TWGE Group and the two SII insurance firms are summarised below:

As at 31 December 2022 £'000	TWGE Group	LGI	LGL
Available Own Funds	132,143	39,590	4,785
Eligible Own Funds to meet the MCR	132,143	39,590	4,785
Eligible Own Funds to meet the SCR	132,143	39,590	4,785
SCR	65,812	16,024	3,455
Solvency Ratio %	**201%**	**247%**	**138%**

As at 31 December 2021 £'000	TWGE Group	LGI	LGL
Available Own Funds	124,190	35,643	4,695
Eligible Own Funds to meet the MCR	121,500	35,330	4,695
Eligible Own Funds to meet the SCR	124,190	35,643	4,695
SCR	64,062	16,104	3,126
Solvency Ratio %	**194%**	**221%**	**150%**

TWGE Group, LGI and LGL maintained own funds above their SCR and MCR requirements during the entire year. Further detail is provided in Section E.

Statement of Directors' Responsibilities

The Directors are responsible for preparing the single group SFCR in accordance with the PRA rules and SII Regulations.

The PRA Rulebook for SII firms in Rule 6.1(2) and Rule 6.2(1) of the Reporting Part requires that the Group must have in place a written policy ensuring the ongoing appropriateness of any information disclosed and that the Group must ensure that its SFCR is subject to approval by the Directors.

Each of the Directors, whose names and functions are listed in section B1 of this document on page 21, confirms that, to the best of their knowledge:

a) Throughout the financial year in question, the Group and its solo insurance undertakings have complied in all material respects with the requirements of the PRA rules and SII Regulations as applicable; and

(b) It is reasonable to believe that, at the date of the publication of the SFCR, the Group and its solo insurance undertakings continue to comply and will continue to comply in future.

By Order of the Board

Christian Formby

Chief Executive Officer

6 April 2023

A Business and performance

A.1 Business

Undertakings included in the SFCR

This is the single Group SFCR for the TWGE Group. It covers the business of TWGE Group on a consolidated group basis, with TWGE as the supervised parent company, and individually for the two UK incorporated insurance firms LGI and LGL.

		Legal Form	Principle activity
Supervised Group Parent:	TWG Europe Limited	Private limited company	Holding company
SII Firms:	London General Insurance Company Limited PRA firm reference number: 202689	Private limited company	General insurance
	London General Life Company Limited PRA firm reference number: 202801	Private limited company	Life insurance

Unless otherwise stated the information in this document should be understood to refer to TWGE Group, LGI and LGL.

Regulator

TWGE Group (at the level of the Group), LGI and LGL are supervised by the PRA in the UK. LGI and LGL are also regulated by the FCA in the UK. PRA and FCA contact details are below:

Prudential Regulation Authority
20 Moorgate
London
EC2R 6DA
0207 601 4878

Financial Conduct Authority
12 Endeavour Square
London
E20 1JN
0800 111 6768

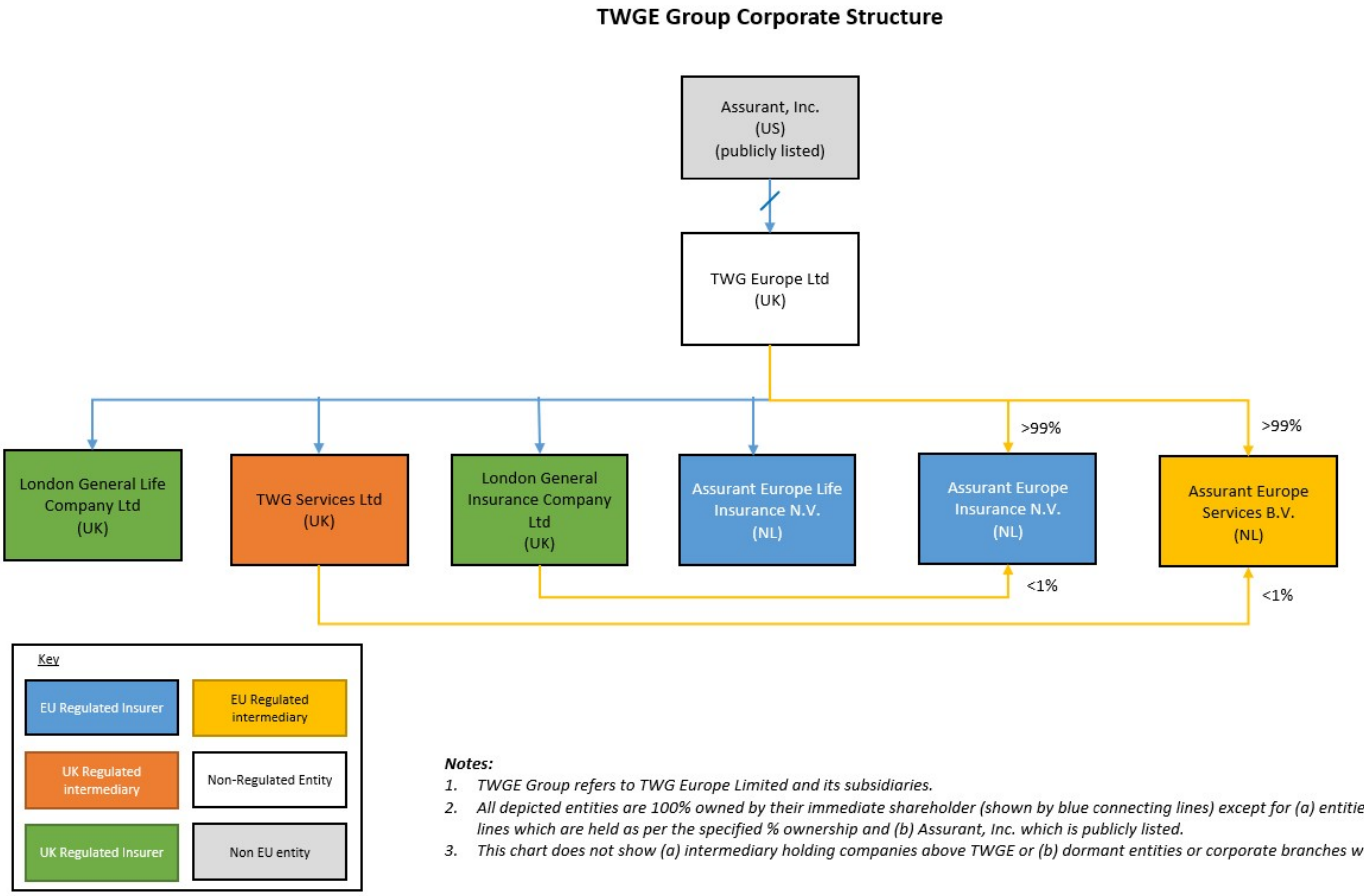
Shareholder

TWGE directly holds 100% of the issued share capital and voting rights of LGI and LGL.

TWGE's immediate parent undertaking is US based TWG Holdings, Inc.

TWGE Group Structure

The scope of the Group included in this SFCR for the purposes of providing consolidated SII and financial statement information is shown in the table below:



TWGE, LGI, LGL and TWGSL are considered within this SFCR. The structure chart above also includes the Dutch subsidiaries of TWGE which are not within the scope of this SFCR.

Lines of Business and Geographical Areas

TWGE Group is a specialist business focused on insurance underwriting, administration, and marketing of three core product lines operating through companies based in the UK and the European Union. These are primarily consumer insurance products that are marketed across UK and the European Union and are distributed on a Business-to-Business-to-Consumer basis through relationships with a range of motor dealers, manufacturers, retailers, financial institutions, and other distributors. The Group provides Motor Warranty and ancillary products including Guaranteed Asset Protection (GAP), Cosmetic damage, Appliance & Technology, including warranty, and Creditor, including unemployment, accident, and life.

All UK and European Union insurance operations are conducted by entities that are subsidiaries of TWG Europe Limited collectively known as the TWGE Group. TWGE Group operates two UK insurance companies, LGI and LGL and two EU insurance companies, AEI and AEL. LGI is an authorised provider of general insurance contracts. LGI's continued focus of the business growth strategy is with Auto (EV ONE) and Appliance and Technology (A&T). LGL is an authorised provider of life insurance contracts. LGL has cancelled its few remaining policies in 2022 and has now applied to the PRA for deauthorisation. Also, within the Group are TWGSL and AES, which are regulated intermediaries that provide administration to the Group insurance entities and directly to some of TWGE group clients.

The table below shows a subset of the main operating entities. The UK entities are regulated by the PRA and/or FCA and the entities in the Netherlands are regulated by the DNB and/or AFM. The Swiss branch of LGI is regulated by the Swiss Financial Market Supervisory Authority (FINMA).

<table>
<tr><th>Legal Entity</th><th>Country of incorporation and branches</th><th>Principal activity</th><th>Major lines of business</th></tr>
<tr><td colspan="4">European Parent Company</td></tr>
<tr><td>• TWG Europe Limited</td><td>• United Kingdom</td><td>• European holding company</td><td>N/a</td></tr>
<tr><td colspan="4">Solvency II insurance entities</td></tr>
<tr><td>• London General Insurance Company Limited</td><td>• United Kingdom
Branches:
• Switzerland</td><td>• General Insurance underwriter</td><td>• Fire and Other Property Damage
• Miscellaneous Financial Loss</td></tr>
<tr><td>• London General Life Company Limited*</td><td>• United Kingdom</td><td>• Life Insurance underwriter</td><td>N/a</td></tr>
<tr><td>• Assurant Europe Insurance N.V.</td><td>• Netherlands</td><td>• General Insurance underwriter</td><td>• Fire and Other Property Damage
• Miscellaneous Financial Loss
• Health Insurance</td></tr>
<tr><td>• Assurant Europe Life Insurance N.V.</td><td>• Netherlands</td><td>• Life Insurance underwriter</td><td>• Health Insurance
• Other Life insurance</td></tr>
<tr><td colspan="4">Insurance intermediary entities</td></tr>
<tr><td>• TWG Services Limited</td><td>• United Kingdom</td><td colspan="2">• Intermediary and administrator for products underwritten by LGI and provider of administrative services to external parties.</td></tr>
<tr><td>• Assurant Europe Services B.V.</td><td>• Netherlands</td><td colspan="2">• Intermediary and administrator for products underwritten by AEI and AEL.</td></tr>
</table>

** LGL has no active policies at the end of 2022. Subsequent to the year end the Company has applied to PRA for de-authorisation as regulated insurance firm*

Significant events during the reporting period

COVID19

The tail of the COVID-19 pandemic had various and sometimes opposing impacts on the financial position of TWGE Group, the major ones in random order being:

- Economic activity generally was volatile in 2022 but less than in 2021. TWGE and LGI's customers were impacted differently, with retailers and dealers recovering sales and on-line channels experiencing slight decreases compared to 2021. TWGE and LGI overall were impacted slightly negatively on the lower level of sales in Auto but this was somewhat offset by the increase in sales through online market place operators.

- Due to reduced (travel) activity levels in general, numbers of claims made decreased, positively impacting the company's result. The logistical cost of repair or replacement sometimes increased but this did not exceed the benefits of reduced numbers of claims.
- Due to governmental support measures, the Creditor lines were not impacted by additional unemployment or disability claims.

Inflation

In February 2022, the Russian Federation invaded Ukraine, which triggered the start of a period of global economic uncertainty and the establishment of new sanctions against the Russian Federation and Belarus. TWGE and LGI are impacted by the inflationary effect that the reduced import of energy from the Russian Federation has on general price levels worldwide and the impact these price levels have on the companies that TWGE and LGI invest in via their bond portfolios. TWGE and LGI's current year operational result was impacted only modestly by inflation but their investment portfolios lost significant value as a consequence of market interest rates adapting to the high inflationary environment.

A.2 Underwriting Performance

Financial information in paragraphs A2 to A4 is presented on a UK GAAP basis.

The underwriting performance of TWGE Group, LGL and LGL by SII line of business is set out below:

TWGE Group Year ended 31 December 2022 £'000	Fire & Other Damage to Property	Miscellaneous financial loss	Health Insurance	Other life insurance	Total
Net written premiums	75,243	34,431	5,835	341	115,850
Net premiums earned	70,843	38,188	6,123	666	115,820
Net claims incurred	(15,900)	(5,906)	(2,057)	(119)	(23,982)
Expenses incurred	(52,820)	(29,619)	(3,169)	(180)	(85,788)
Net Underwriting Performance	**2,123**	**2,664**	**898**	**366**	**6,051**

LGI Year ended 31 December 2022 £'000	Fire & Other Damage to Property	Miscellaneous financial loss	Other Motor	Health Insurance	General Business Technical Account
Net written premiums	2,535	15,446	2,297	(1)	20,277

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Net premiums earned	3,112	17,242	2,386	19	22,758
Net claims incurred	(1,212)	(3,393)	(681)	3	(5,284)
Expenses incurred	(2,176)	(15,141)	(1,890)	(24)	(19,231)
Net Underwriting Performance	**(277)**	**(1,293)**	**(185)**	**(2)**	**(1,757)**

LGL Year ended 31 December 2022 £'000	Health Insurance	Other Life Business	Long Term Business Technical Account
Net written premiums	-	-	-
Net premiums earned	-	-	-
Net claims incurred	-	-	-
Net operating expenses	-	97	97
Net Underwriting Performance	-	97	97

TWGE Group Year ended 31 December 2021 £'000	Fire & Other Damage to Property	Miscellaneous financial loss	Health Insurance	Other life and non-life insurance	Total
Net written premiums	65,822	30,397	5,789	335	102,343
Net premiums earned	68,727	41,871	6,765	1,059	118,422
Net claims incurred	(21,017)	(5,969)	(3,741)	97	(30,630)
Expenses incurred	(48,679)	(33,466)	(4,667)	(780)	(87,593)
Net Underwriting Performance	**(969)**	**2,436**	**(1,643)**	**376**	**200**

LGI Year ended 31 December 2021 £'000	Fire & Other Damage to Property	Miscellaneous financial loss	Other Motor	Health Insurance	General Business Technical Account
Net written premiums	1,579	13,706	2,171	-	17,456
Net premiums earned	4,625	16,820	1,741	56	23,242
Net claims incurred	(2,673)	(2,565)	(594)	(27)	(5,859)
Expenses incurred	(4,334)	(16,160)	(1,180)	(33)	(21,708)
Net Underwriting Performance	**(2,382)**	**(1,905)**	**(34)**	**(4)**	**(4,325)**

LGL Year ended 31 December 2021 £'000	Health Insurance	Other Life Business	Long Term Business Technical Account
Net written premiums	-	0	0
Net premiums earned	-	0	0
Net claims incurred	10	-	10
Net operating expenses	-	(164)	(164)

Net Underwriting Performance	**10**	**(164)**	**(154)**

For purposes of the consolidation, commission and other expenses paid by the SII insurance entities to another AEG intermediary and service companies have not been eliminated from the underwriting result and so the figures are in line with those reported in the reporting templates S.05.01 and S.05.02 in Appendix F. The equivalent commission and fee income in the intermediary and service companies and their own expenses e.g., staff wages, sub-broker commissions, overheads etc. are reported as other income and expenses and noted in section A.4 below.

Analysis of premium, claims and expenses by full SII line of business are included in templates S.05.01 for TWGE Group, LGI and LGL in Appendix F.

Results and performance

Consolidated

The underwriting performance of the two SII insurers is discussed below.

LGI

In 2022, LGI's gross written premiums reduced by 8.5% to £25,314k from £27,677k. This was mainly caused by a reduction in Automotive Warranty and GAP product sales, as transactions in the used and new vehicles market space reduced considerably due to global shortage of semiconductors. The reduction was somewhat offset by significant increase in sales of appliance and technology products through an online marketplace operator.

The Company's net earned premiums reduced by 2.1% only, to £22,758k from £23,242 in 2021. A portion of LGI's products are multi year policies and therefore earn through the P&L in later years. As a consequence, the effect of to above the reduction in written premiums was only partially seen in the year. The loss ratio reduced from 25% to 23%, in particular for lower claims frequency and severity in Automotive and Appliance and technology business. This had the effect of offsetting some of the adverse variance in net earned premiums. The expense ratio decreased to 85% mainly as a result of a reduction in cost recharges from related service companies in the TWGE and AGL group.

LGL

During the year gross premiums written were nil. The company ceased to write new business in 2018. The remaining active policies were closed on 30 September 2022.

In the current year LGL has made a profit on ordinary activities before tax of £92k compared to a loss of £250k in the prior year.

Analysis by geography

All general insurance business is underwritten in the UK and all risks are in the UK and Switzerland (run-off). All long-term business underwritten by LGL was underwritten in the UK and all risks were located in the UK.

An analysis of premium, claims and expenses by material country of risk location is provided in the template P.05.02 in the appendices.

A.3 Investment Performance

LGI's investment portfolios comprise a mixture of fixed rate government bonds, corporate bonds and other short-term cash deposits. In addition, LGI holds short term investments in money market liquidity funds with next day access.

As at 31 December 2022, LGL no longer has an investment portfolio and only holds cash at banks.

TWGE Group's investment strategy is to hold the majority of investments to maturity where possible in order to provide certainty of the future income stream.

Income for the period was negative as a consequence of the base rate increases implemented by the Bank of England and the ECB in the course of the year. LGI's bond portfolio market value is lower than nominal value, meaning that a portion of the recorded losses will be recovered at maturity of the bonds concerned.

TWGE Group As at 31 December 2022 £'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	2022 Total
Government Bonds	286	(236)	(1,910)	(1,861)
Corporate Bonds	2,408	(2,321)	(18,963)	(18,876)
Collateralised Securities	6	-	(5)	1
Collective Investment Undertakings	149	(2)	(201)	(54)
Cash & Deposits	(29)	-	-	(29)
Total investment income	**2,819**	**(2,558)**	**(21,080)**	**(20,819)**

LGI £'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	2022 Total
Government Bonds	146	(103)	(528)	(484)
Corporate Bonds	1,132	(449)	(5,240)	(4,557)
Collateralised Securities	6		(5)	1
Collective Investment Undertakings	12			12
Cash & Deposits	1			1
Total investment income	**1,297**	**(552)**	**(5,774)**	**(5,028)**

LGI £'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	2022 Total
Government Bonds	7	(19)	-	(12)
Corporate Bonds	-	-	-	-
Collective Investment Undertakings	12	-	-	12
Cash & Deposits	0	-	-	0
Total investment income	**19**	**(19)**	**-**	**0**

TWGE Group As at 31 December 2021 £'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	2022 Total
Government Bonds	343	(95)	(674)	(426)
Corporate Bonds	2,287	84	(4,571)	(2,201)
Collateralised Securities	1	-	-	1
Collective Investment Undertakings	(3)	(3)	-	(5)
Cash & Deposits	2	-	-	2
Total investment income	**2,630**	**(14)**	**(5,245)**	**(2,629)**

LGI £'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	2021 Total
Government Bonds	110	(46)	(205)	(140)
Corporate Bonds	994	278	(1,995)	(723)
Collateralised Securities	1	-	-	1
Collective Investment Undertakings	-	-	-	-
Cash & Deposits	(49)	-	-	(49)
Total investment income	**1,055**	**233**	**(2,200)**	**(912)**

LGI £'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	2021 Total
Government Bonds	16	(27)	2	(13)
Corporate Bonds	-	-	-	-
Collective Investment Undertakings	-	-	-	-
Cash & Deposits	2	-	-	3
Total investment income	**18**	**(21)**	**(2)**	**11**

Investment expenses include fees payable to the investment fund manager and an allocation of costs of the TWGE Group treasury function:

Investment expenses **£'000**	TWGE Group	LGI	LGL
Year ended 31 December 2022	(668)	(215)	-
Year ended 31 December 2021	(752)	(288)	(23)

A.4 Performance of other activities

TWGE Group receives administration fees from external customers and Assurant affiliates in the UK.

Other Income (£'000's) **Year ended 31 December 2022**	TWGE Group	LGI	LGL
Net foreign exchange gains/(losses)	124	(61)	(5)
Administration fees - fellow group undertakings	22,772	-	-
Administration fees - third parties	7,698	-	-
Other income	60	-	-
Gain/(loss) on sale of fixed assets	(50)	-	-
Total Other Income	**30,604**	**(61)**	**(5)**

Other Income (£'000's) Year ended 31 December 2021	TWGE Group	LGI	LGL
Net foreign exchange gains/(losses)	(476)	(133)	(77)
Administration fees - fellow group undertakings	16,711	-	-
Administration fees - third parties	8,673	-	-
Other income	1,578	1,521	-
Gain/(loss) on sale of fixed assets	-	-	-
Total Other Income	**26,485**	**1,388**	**(77)**

A.5 Any other disclosures

There are no other matters to report.

B System of governance

B.1 General information on the system of governance

Governance Framework Overview

TWGE Group's system of governance sits within the overarching system of governance of AEG, which operates a robust internal governance framework across all of its entities, countries, and lines of business. The framework is organised in a manner relevant to business activities and size, factoring in specific local legal and/or regulatory requirements as necessary.

Board and management committees exist to direct, control and oversee activities in key areas such as:

- Strategy and business plans (setting, execution and monitoring thereof);
- Audit, risk, and compliance; and
- Day-to-day business activities and performance including:
  - Financial performance;
  - Sales and client management;
  - Customer experience;
  - Risk management;
  - Solvency, capital and reserving;
  - People and culture;
  - Operational resilience;
  - New business processes;
  - Investments and treasury; and
  - Technology.

During 2022, the governance framework for the TWGE Group was organised through the following key bodies:

Board

Structure and Membership

Although each entity has a separately constituted board of directors, AEG operates a combined operating board structure with common directors across its core UK entities to enable aligned oversight and supervision of the AEG. The Board, with support from its Committee, oversees the whole of AEG, except where reserved matters and/or specific local legal and/or regulatory requirements dictate otherwise.

The Board is composed of an appropriate combination of Executive Directors, Group Non-Executive Directors and a sufficient number and quality of Independent Non-Executive Directors who between them have sufficient breadth of knowledge of the business to provide effective challenge.

The directors set out below held office during the whole of the year from 1 January 2022 to the date of this report unless otherwise indicated:

Director	Role	Approved Function	Comments
Colin Martin Kersley	INED	SMF9 - Chair of the Governing Body	Resigned 31/12/2022
Stuart Edward Purdy	INED	SMF9 - Chair of the Governing Body (from 01/01/2023) SMF10 - Chair of the Risk Committee SMF11 - Chair of Audit Committee	Stuart Purdy acted as SMF9 (Chair of the Governing Body) under transitionary rules from 01/01/2023 until 01/03/2023 when regulatory approval was granted for him to perform such role.
Christian Wesley Formby-Hernandez	Executive	SMF1 - Chief Executive Officer	
Claude Kwasi Sarfo-Agyare	Executive	SMF2 - Chief Finance Officer	Resigned 20/12/2022. Cristiano Furtado acted as SMF2 (Chief Finance Officer) under transitionary rules from 21/12/2022 until 09/02/2023 when regulatory approval was granted for Andy Schaut to perform such role.
Ricardo Jesus Morales-Gomez	Group Non-Executive Director	SMF7 - Group Entity Senior Manager	Resigned 02/02/2023
George Derek Wilson Bartlett	INED	Director of firm who is not a certification employee or a SMF manager	Appointed 01/01/2023

Director	Role	Approved Function	Comments
Suzanne Shepherd	Group Non-Executive Director	SMF7 - Group Entity Senior Manager	Appointed 02/02/2023. Not appointed to LGL.
Michael James Schofield	Executive	SMF4 – Chief Risk Function	Appointed 02/02/2023. Not appointed to LGL.

Role and Responsibilities of the Board

The overriding collective role of the Board is to promote the long-term sustainable success of the TWGE Group, generating value for its stakeholders through effective governance and assumption by the Board of direct responsibility in the following key areas:

a) Establishment of purpose, values, and strategy, ensuring alignment with the desired culture.
b) Ensuring the necessary resources are in place to enable agreed objectives to be met and measuring performance against such objectives.
c) Leadership within a framework of prudent and effective controls which enable risk to be assessed and managed.
d) Engagement with shareholders and other stakeholders.

Executive Directors have an intimate knowledge of the business, whereas Non-Executive Directors bring a wider perspective; with relevant skills and experience of best practices they have a key role in constructively and independently challenging the Board and helping to develop strategy and business plans.

Non-Executive Directors also scrutinise the performance of the Executive Directors in meeting agreed goals and objectives and monitor performance. They satisfy themselves on the integrity of financial information, and that financial controls and systems of risk management, are rigorous and robust.

Board Committees

To increase efficiency, the Board has one board-level committee, the ARCC, which is responsible for discharging governance responsibilities in respect of audit, risk, internal control, and compliance.

The ARCC is composed solely of Independent Non-Executive Directors, one of whom acts as Chair. Regular formal meetings are held which include regular reports from Risk, Compliance, External Audit, Internal Audit, Actuarial and Finance.

As per its Terms of Reference, the ARCC's key responsibilities include:

a) Monitoring and reviewing the effectiveness of the internal audit function.
b) Overseeing relationships with external auditors (including their effectiveness and independence) and assessing the integrity of the annual reports and financial statements.
c) Overseeing the solvency and capital position.
d) Overseeing the whistleblowing and fraud investigation process.
e) Ensuring compliance with legal and regulatory requirements.
f) Overseeing the effectiveness and appropriateness of the risk management and internal control frameworks.
g) Reporting to the Board on how it has discharged its responsibilities.

Management Committees

As explained above, AEG operates a management committee structure to ensure appropriate oversight and control of performance, activity, and risks within the business.

The management committee structure is determined by the ELC which is responsible (except where specific local legal and / or regulatory requirements dictate otherwise), for managing and overseeing the day to day business and affairs of the AEG in accordance with the agreed strategy and the authority delegated to it by the Board.

The ELC is chaired by the President, Europe and is composed of all Executive Directors plus other senior managers nominated by the President to represent certain business units, geographies, and functional areas. Regular formal meetings are held, and relevant outputs are reported to the Board regularly via the President's quarterly report to the board.

As per its Terms of Reference, the ELC's key responsibilities include:

a) Development and execution of strategy and business plans, and monitoring of performance thereof.
b) Ensuring that activities are consistent with the strategy, risk tolerance/appetite and policies approved by the Board.
c) Reporting to the Board (via the President) on how it has discharged its responsibilities.
d) Oversee business functions, ensuring that the business has the necessary resources to meet its objectives.
e) Monitoring the financial position, ensuring that applicable legal and regulatory requirements (including as to capital and solvency) are met.
f) Overseeing business development and new business opportunities.
g) Overseeing client relationships and customer experience.
h) Setting and overseeing the management governance framework.

The ELC has established a number of management sub-committees and forums to assist it in discharging the roles and responsibilities assigned to it by the Board. Each committee and forum has a core membership consisting of relevant senior managers and, in general, committees and forums are chaired by the relevant Senior Manager Function holder. Each sub-committee and forum is delegated with authority from the ELC to perform certain roles and responsibilities assigned to it within Terms of Reference set by the ELC. The sub-committees and forums are accountable to the ELC but do not relieve the ELC of any of its responsibilities.

Assessment of the adequacy of the system of governance

AEG's system of governance is periodically reviewed by the Board to ensure that it is effective and it provides for sound and prudent management of the business. Such reviews take into account the nature, scale and complexity of the business both at individual and at group level, as well as the structure of the group. The scope, findings and conclusions of such reviews are documented and reported to the Board with suitable feedback loops in place to ensure that any follow-up actions are undertaken and recorded.

Based upon the most recent internal review conducted during 2022, the Board has assessed TWGE Group's system of governance to be adequate and appropriate to the nature, scale and complexity of the risks inherent in the business.

Material changes in governance structure

There were no material changes to the governance structure during 2022.

Key Functions

A Fit and Proper Person framework is in place to ensure functions are led by appropriately skilled people. In addition to the directors listed in the previous section, the following individuals have also been approved by the appropriate UK regulatory bodies as at 31 December 2022 and all are subject to AEG's Fit and Proper Policy.

A complete list of SMF holders is shown below:

Name	Approved Function
C W Formby-Hernandez	SMF1 - Chief Executive Function
C K Sarfo-Agyare (end 31/12/2022)	SMF2 – Chief Finance Officer
A Schaut (wef 09/02/2023)	SMF2 – Chief Finance Officer
M J Schofield	SMF4 – Chief Risk Function
M Klimek	SMF5 – Internal Audit Function
M Carter (end 07/09/2022) R Morales-Gomez (end 02/02/2023) S Shepherd (wef 27/01/2023)	SMF7 - Group Entity Senior Insurance Manager
C M Kersley (end 31/12/2022)	SMF9 – Chair of the Governing Body
S E Purdy	SMF9 – Chair of the Governing Body (wef 01/02/2023) SMF10 – Chair of the Risk Committee SMF11 - Chair of the Audit Committee
N Colclough (wef 01/07/2022)	SMF16 – Compliance Oversight
R Weddell (end 30/06/2022)	SMF16 – Compliance Oversight
C Woolnough M R Davies N Rashid R Carson J Fell (end 30/11/2022) A Sheard (end 31/01/2022) R A Saldarriaga (end 15/12/2022) S Harper (wef 28/01/2022) M I Danino (wef 07/09/2022) A M Buckner (wef 13/10/2022) R Stevens (wef 13/10/2022) L Sturgeon (wef 24/01/2023)	SMF18 – Other Overall Responsibility
W T Diffey	SMF20 – Chief Actuarial Officer
G A Davies	SMF23 – Chief Underwriting Function
C W Formby-Hernandez	Responsible for Insurance Distribution

Name	Approved Function
G D W Bartlett (wef 01/01/2023) P I Thomas (wef 03/04/2023)	Director of firm who is not a certification employee or a SMF manager

The detailed responsibilities of each SMF holder are documented in Management Responsibilities Maps for each insurer within the TWGE Group which are reviewed and approved by the Board periodically. This ensures that each SMF holder has the necessary authority and operational independence to carry out their role. On an annual basis, as part of the business planning process, each SMF holder will ensure that they have the necessary resources to deliver on their responsibilities. The business plan is reviewed and approved by the Board annually.

SMF holders and external audit have direct access to the ARCC and the Board to share any concerns they may have about the governance framework.

Remuneration Policy

The ELC oversees remuneration policies and procedures for all staff below Executive level. Executive incentive plans and remuneration policies are governed at an Assurant, Inc. level by people with knowledge of relevant UK laws and regulations. For this reason, there is no UK based Remuneration Committee.

AEG Group places great value upon the contributions, skills and expertise of its employees and recognises the need to attract and retain the best talent to drive business performance. The remuneration policy not only helps to attract and retain employees but also ensures that the Group has employees with the right skills and qualifications. It also recognises the importance of aligning incentives to encourage appropriate decision making and alignment with the business' objectives and risk management strategy.

AEG's remuneration policy and practices seek to provide incentives to employees that are within the risk tolerance limits of the business and could undermine the effective risk management of the Group and culturally aligned to our values. It is therefore necessary to provide for requirements on remuneration for the purposes of the sound and prudent management of the business and establish remuneration arrangements.

Variable remuneration is performance related; the total amount of the variable remuneration is based on a combination of the assessment of performance of the business and the individual. The performance of the business always outweighs the performance of the individual to ensure appropriate variable remuneration decision making is made.

There are a number of variable remuneration schemes which cover both short and long-term incentive plans. The scheme periods and deferral in respect of the short-term schemes are in line with the short-term nature of the insurance liabilities the business writes or are linked to client contracts. Each variable remuneration scheme has a different scope of employees and performance measurements. Variable remuneration schemes are aligned to the nature of the role and key responsibilities. Employees are only eligible to participate in either; Head Office bonus, STIP or SIP and one long term incentive scheme i.e. ALTEIP. Below is a summary of the variable remuneration schemes.

Employees are only eligible to participate in one of the short-term incentive plans. Variable remuneration as a percentage of total direct compensation shall not exceed 100% of salary.

The deferral periods for the awards are considered to be appropriate and proportionate to the nature of the Assurant business and to the length of the risk profile described above.

UK based Directors receive no variable remuneration based directly on the performance of AEG, their remuneration being linked to the performance of the wider Assurant, Inc. group.

Non-Executive Directors receive no variable remuneration.

Transactions with shareholders, with persons who exercise a significant influence on the undertaking, and with members of the administrative, management or supervisory body

During the year TWG Europe Limited received capital contribution of £9m from its parent, TWG Holdings, Inc., this was in turn invested into LGI as capital contribution.

B.2 Fit and proper requirements

AEG Group must be able to demonstrate that it employs people who are fit and proper for the professional discharge of the responsibilities allocated to them, to assist in driving the appropriate culture in the business to minimise risk and to ensure sound and prudent management of the business.

AEG acknowledges that fitness and propriety across the business is essential for commercial reputation and customer confidence as well as regulatory compliance. This is ensured by operating consistent procedures during recruitment, and ongoing employment, to be satisfied that an individual:

- will be open and honest in their dealings and is able to comply with the requirements imposed upon them (honesty, integrity and reputation)
- has the necessary knowledge, skills, and experience to carry out the function they are to perform (competence and capability)
- is financially sound (financial soundness).

The Group operates a robust recruitment process and carries out the appropriate due diligence on all candidates. Anyone who is being assessed to perform in a SMF or Key Function Holder role is subject to a rigorous review of their fitness and propriety against the role requirements. All assessments with a fit and proper requirement are supported by an HR professional.

The following supporting evidence for every appointment is maintained: CV, Role Profile, and interview notes. For a prospective candidate to be passed as ‘fit and proper’, in addition to comprehensive interviews, additional checks include: credit checks, checks from the Disclosure and Barring Service (DBS) or Disclosure Scotland, or Access Northern Ireland, proof of qualifications, regulatory references covering at least six years’ previous employment; and self-certification regarding Conflicts of Interest.

For appointments for role-holders based outside of the UK, similar checks are carried out locally which are aligned to appropriate legislation.

If the results of any screening are ambiguous and/or give cause for concern, the matter is raised with the prospective candidate to obtain a satisfactory explanation. Concerns are escalated to, and discussed with, the Senior European Compliance Officer, or the Chief Risk Officer. If screening concerns cannot be satisfactorily resolved, any offer of employment is withdrawn.

B.3 Risk management system including the own risk and solvency assessment

Risk Management System

TWGE Group employs an enterprise wide approach to its Risk Strategy in order to embed a comprehensive and consistent risk management methodology. The objective of TWGE Group's Risk Strategy is to establish a rigorous RMF to ensure that the principles of good risk management are embedded throughout Assurant.

To this end, the management of the organisation at all levels is required to be risk aware and understand that Risk Management is part of all employees' responsibilities in delivering the business objectives in an efficient and effective manner in line with an agreed and established risk appetite and enterprise vision and values.

Risk Strategies

TWGE Group has defined its Risk Appetite for its key risks and adopts a number of risk management strategies to ensure that the group's Risk Appetite is not exceeded. The choice of strategy varies depending on the nature of the risk and related circumstances. These strategies include:

- Risk acceptance: the TWGE Group Board accepts risks that fall within the boundaries/limits defined in the risk appetite framework. Any risk falling outside the specified limits or boundaries is reviewed and may be accepted for a defined period of time.
- Risk reduction/minimisation: these activities generally relate to control and mitigation activities, and therefore this strategy may include, any or all of the following, the design of new process or accounting controls, contracting controls, changes in product design, improvement in a set of Terms and Conditions, or other changes designed to control and/or mitigate risk.
- Risk transfer: risk is transferred principally through reinsurance agreements. These may include, but are not limited to stop loss, excess of loss, quota share, or other such treaties. Other types of risk transfer can also be considered.
- Risk Avoidance: where an activity is outside the risk appetite of the TWGE Group, TWGE will seek to avoid exposure to that type of risk.

Process

TWGE Group works within the three lines of defence model and reinforces the requirement for first line management of risk, with oversight and challenge from the second line risk and compliance functions and third line internal audit function:

Enabling Risk Culture	Oversight	Board and Executive	• Establishes risk appetite and strategy • ARCC - Approves risk framework and challenges risk management function	Risk Management Framework and Process Alignment
	3rd Line of Defence	Internal Audit Services	• Provides independent assurance on the effectiveness of first and second line of defence functions	
	2nd Line of Defence	Risk Management Function Compliance Function Actuarial Function Data Protection Officer	• Design, interpret and develop overall RMF • Overview of TWGE Group Risk Registers • Ownership of ORSA Process and Output • Monitor controls in place against key risks • Challenges risk mitigation and acceptance • Reports on Risk exposures, Issues, mitigations, and resolutions • Actuarial Function Report; Underwriting / Reinsurance Opinions under Solvency II	
	1st Line of Defence	Business / Functions	• Risk Accountable Executives • Risk Owners • Owner of the risk management process • Identifies, manages, and mitigates risks • Identifies, manages, and reports on Issues	

TWGE Group has implemented a robust governance structure around Risk Management that is proportionate to the scale and complexity of the group. The ELC is supplemented by a quarterly sub-committee, the Management Risk Committee, that is attended by the Risk Accountable Executives to review the risk profile, status of remediating activities and any risk events during the quarter.

The Risk Function maintains a key risk register for the overall business, with each key risk having an agreed Risk Accountable Executive, who is supported in managing the risk exposure by a Risk Co-Ordinator and / or Risk Owner.

Business areas are responsible for maintaining the controls to manage and mitigate the risk exposure. The Business, supported by Risk, update the risk registers on a periodic basis defined in the risk register process, using measurement techniques specified in Assurant’s RMF.

Management is given authority to manage risks within the agreed risk appetite. The monitoring processes and controls that operate over the organisation will be complementary to the processes and controls used by the Risk organisation and its committees.

Own Risk and Solvency Assessment

As part of its RMF, TWGE Group conducts an annual Own Risk and Solvency Assessment (ORSA). This assessment considers the operating environment and wider risks to which TWGE Group is exposed and provides a forward-looking assessment of the potential risks and capital impacts, within the wider context of TWGE Group’s business strategy.

The ORSA is completed and approved by the Board annually and ad hoc ORSA's are completed when required in line with the ORSA policy.

The risk management processes, and systems of the TWGE Group are combined and there are no separate processes for its UK insurance entities. This includes the ORSA process. TWGE Group has obtained a waiver from the PRA allowing a single group ORSA process. This process covers all the necessary requirements for each UK SII insurance firm within the group, had it been performed on a standalone basis. A separate ORSA is produced for each of the European insurers within the TWGE Group.

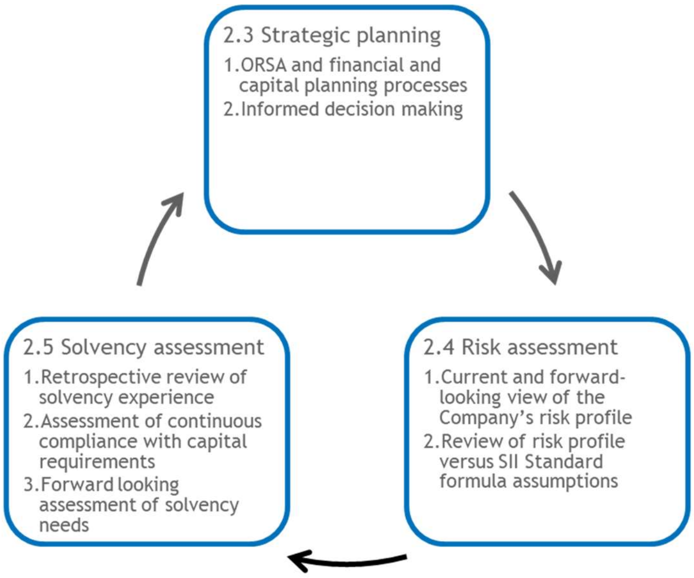
The ORSA is not separate to the RMF, but an integral tool to describe the whole risk to the business and, by implication, the ability of the business to meet the funding requirements of its overall business plans including its on-going liabilities now and into the future.

The ORSA is a forward-looking analysis of the TWGE Group insurance entities' short and long-term risks, which is updated regularly to ensure sufficient own funds to meet the entities' existing and future liabilities, through a combination of risk, capital and solvency projections.

In general the "ORSA process" is one of coordinating with many areas of the business to ensure that the information, data and calculations are available for reporting through to the Results and ensuring that key stakeholders are available to review and comment on the ORSA outputs.

The process is owned and operated by the Risk Function, which has access and continuing understanding and control of many of the key elements that make up the ORSA.

ORSA Process



B.4 Internal control

TWGE Group's internal control system, is designed to provide reasonable assurance that its reporting is reliable and compliant with applicable laws and regulations, and its operations are effectively controlled.

TWGE Group uses a three lines of defence principle. TWGE's general efforts to promote, foster and facilitate an organisational culture of sound and ethical business practices is the responsibility of the first line of defence, i.e. business management. Second line of defence functions help, support, and challenge the business management to meet that responsibility. Internal audit will provide independent assurance and is the third line of defence. TWGE's internal control system and three lines of defence model is further elaborated in policies, procedures and guidelines.

The Board is ultimately responsible for overseeing and maintaining the adequacy and effectiveness of risk management processes, practices and internal control systems. In practice, the oversight and management of these systems necessarily involves participation of the Board, the ARCC, senior management, Risk, Finance, Compliance, Legal, business managers, various management committees and Internal Audit. Primary responsibility for ensuring day-to-day oversight of the internal control system lies with the relevant SMFs and Key Function Holders.

TWGE Group promotes the importance of appropriate internal controls by:

- ensuring that all personnel are aware of their role in the internal control system;
- ensuring a consistent implementation of the internal control systems across the company; and
- establishing monitoring and reporting mechanisms for decision making processes. The Risk Management and Controls section above includes a brief description of the internal control systems relating to the risk function.

Compliance

TWGE Group operates within a financial services' regulatory regime in the UK and Europe. The regulators define the standards required within the business via their principles, rules and guidance, which cover key areas around customer protection, customer fair treatment and sustainability – with expectations that these requirements are embedded in the culture of the business, driven from the top of the organisation and managed via robust governance frameworks. All TWGE Group employees are required to understand the regulatory rules and requirements applying to their role, which assists the business in meeting the standards required in both the letter and the spirit of those requirements. Some Senior Managers have specific responsibilities, accountabilities and obligations under the SM&CR regime to the regulators.

Good compliance standards and risk management helps the business build trust with customers, and other stakeholders, and promotes a culture where positive individual behaviours ensure the customer is at the heart of the systems and controls which enable good customer outcomes and the identification/mitigation of poor practice.

TWGE Group's Compliance function's purpose is to ensure that the Group meets the regulatory requirements in the jurisdictions in which it does business. Through engagement with the business leaders and a variety of activities and processes using a risk-based approach to identify, assess, control, measure, mitigate, monitor and report compliance risks across the Group as a part of its advice services, approval processes, and oversight and governance through the Compliance Plan. The Compliance function ensures, together with the People Organisation, there is a strong regulatory compliance culture within the Group.

The function operates independently from the business and is part of TWGE Group's second line of defence, which specifically provides advice on regulatory requirements and assurance regarding the effectiveness of first line controls. It is led by the Chief Compliance Officer, Europe who reports directly to the International Compliance Officer of the parent group and has direct access to the Board and ARCC in order to assist with management of any conflicts of interest. The Chief Compliance Officer, Europe provides regular updates on relevant Compliance matters to the ELC and the Board (via the ARCC).

The Compliance function also:

- owns and develops TWGE Group's relationships with key regulators, including the FCA and PRA, which includes taking a forward-looking view to manage regulatory change.
- carries out horizon scanning activities identifying changes affecting regulatory matters, and working with stakeholders to implement changes to policies and processes.

B.5 Internal audit function

Reporting directly to Assurant CAE and to the ARCC, the IAS function, led by the Head of Internal Audit for AEG (HoIA), is responsible for regularly assessing the adequacy of the internal controls system of TWG Europe and its subsidiaries, including LGI and LGL, and reporting the findings to the AEG Board (via the ARCC).

The bi-annual audit plan is prepared and submitted to the ARCC each six months for review and confirmation. Upon confirmation, IAS distributes the plan to Executive business leaders and executes the plan during the course of the audit plan period. Additionally, at IAS' discretion or at the request of the ARCC, or management, other unannounced audits may be completed.

IAS personnel report directly and solely to the CAE of Assurant Inc. and the CAE reports directly to the Chair of the Assurant Inc. Audit Committee; and administratively to Assurant's Chief Financial Officer.

The AEG Internal Audit Charter defines the framework for the activities of the Internal Audit function as it pertains to AGL (including AGIL), and is approved by the AEG ARCC. The Charter also aligns with the broader global Charter established between IAS and the Assurant Inc. Audit Committee.

The internal audit reporting structure, the AEG Internal Audit Charter and the Global charter allow IAS to be independent of the functions audited; and it provides IAS full, free and unrestricted access to all operations, records, property and personnel. Additionally, it provides the authority to allocate resources, set frequencies, select subjects, determine scope of work, and apply the techniques required to accomplish audit objectives.

Initially the entire risk universe is considered during annual audit planning and subsequent revisions to plan, the highest-risk items are included as risk-based audits. Certain processes, while perhaps not rising to a level of significant risk, are still included on a cyclical basis to ensure breadth of coverage over a span of time.

Secondly, risks associated to the audit are identified and their mitigation evaluated via an assessment of the design and operational effectiveness of key internal controls, information systems, governance, risk management, and financial reporting supplemented where necessary by a programme of testing, creating audit programs for every project.

Audit plan activities typically conclude with some form of communication (audit report, memo, or other testing result) addressed to appropriate management of not only the results of the activities, but also management's action plans for remediation and/or improvement. Depending on the scope of the engagement these actions could be in the area of risk management, controls, or corporate governance with action plans obtained from appropriate management which are tracked by IAS until final completion as part of the IAS issues follow-up process.

Senior management has the opportunity to provide responses to audit findings, which are included in the final report, when that format is used to communicate results. The completed reports are made available to executive leadership, the AEG ARCC and the Assurant Audit Committee.

IAS performs the internal audit functions, including relating to Assurant's insurance processes and activities. IAS typically conducts its audits by business unit or across an entire segment.

B.6 Actuarial function

The actuarial function is responsible for calculating the technical provisions and claims reserves for TWGE Group, as well as calculating the SCR, MCR and carrying out own view standard formula appropriateness reviews on a regular basis. In addition to these key responsibilities, the actuarial function is also responsible for reviewing the appropriateness of insurance product pricing and contributing to the governance committees/forums, capital initiatives and regulatory returns where appropriate.

The function is led by the Chief Actuary. The Chief Actuary has the knowledge and experience, is appropriately qualified, and has the appropriate level of skill necessary to perform this function in accordance with applicable professional and technical standards.

The Chief Actuary coordinates the calculation of technical provisions, provides the Actuarial Function Report and opines on the underwriting policy and reinsurance arrangements, and contributes to the effectiveness of the risk management system.

The Chief Actuary also provides quarterly and annual reports to the Board, via the ARCC, detailing the methodology, assumptions, and results of their work for approval, as well as fulfilling the 2nd line responsibilities of the role for the Actuarial Function Report. ARCC is responsible for challenging those assumptions and ensuring that they are appropriate and not unduly influenced by management. The Chief Actuary also has access to the independent non-executives to escalate any issues or concerns.

B.7 Outsourcing

TWGE Group is supervised on a group basis by the PRA. TWGE Group operates as part of the overall AEG. LGI and LGL have no employees and all services are provided by other AEG companies. As the Boards of TWGE, the European group parent, and of LGI and LGL have common directors, these are not considered to be outsourced arrangements.

Many of TWGE Group's processes are part of wider Assurant, Inc. global activities and staff working and employed in the European business have responsibilities for the European organisation but also report up through the global enterprise structures. Similarly, there are employees of the Global enterprise who perform activities on behalf of the European business. These processes include IT services.

Where such activities relate to critical functions, including Internal Audit and Risk where the SMFs are employees of the Assurant, Inc. group as described in the previous sections, those employees are also directly responsible to the Board for activities performed on behalf of the European business and are therefore also not deemed to be outsourced arrangements.

The Group regularly makes use of third-party organisations to provide goods and services to the business in various areas. From time to time, AEG will choose to source services from third parties or from group companies that would normally be provided internally by the Group itself.

The rationale for this choice is frequently reviewed to make the business more efficient and/or bring innovation and new ideas into the business. However, while the Group can engage a third party to provide the service, the Group retains responsibility for ensuring that appropriate performance and quality standards are both set and achieved by the provider and that the services by design and performance deliver fair customer outcomes.

The Outsourcing policy sets out the standards and controls required for selection of providers of this type of arrangement as well as the requirements for ongoing management of these relationships to ensure adequate oversight and governance of performance of the services.

The Group Outsourcing policy ensures that the Group only outsource services and processes where the risks associated with the relationship and provision of services can be appropriately managed and the service provider (third party or intra-group) can meet our required customer and regulatory obligations and mitigate any risk exposure in the areas of concentration risk and operational risk. Furthermore, any consideration of outsourcing a function or activity will be subject to detailed consideration and a detailed business case requiring executive committee approval before proceeding.

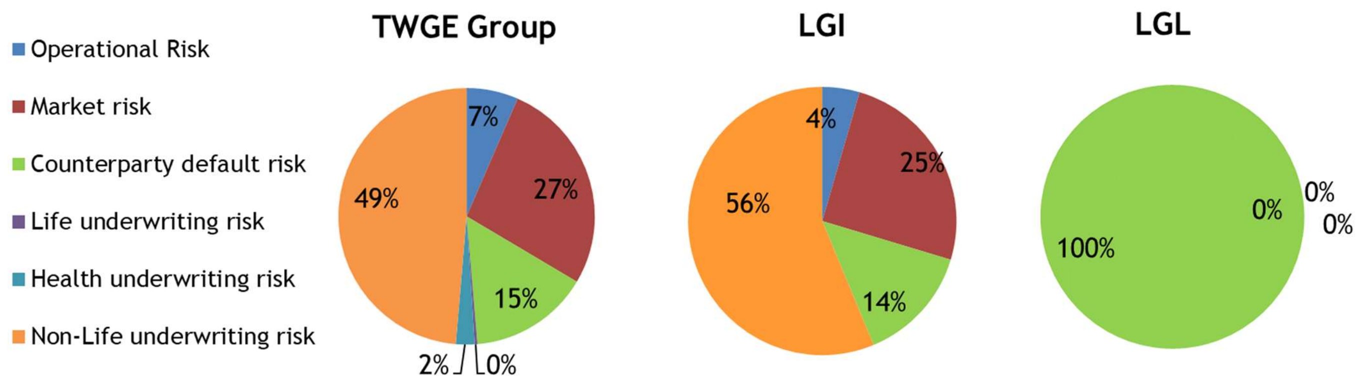
Name of Provider	Outsourced function	Jurisdiction
Assurant, Inc.	Investment Management Services	UK, US
Blackrock, Inc.	Investment Management Services	UK, US
Teleperformance Romania	Administration and Claims Management	EU

B.8 Any other disclosures

None.

C Risk management

The charts below show the distribution of the SCR required for the Group and each SII insurer by risk module (excluding the diversification effects between the risk modules).



The main risks TWGE Group and LGI are exposed to are underwriting risk, inherent in the nature of their insurance business, followed by market risk, arising from both the investment portfolio and technical provisions and credit risk due to counterparty default. LGL is exposed to counterparty default risk as it no longer holds an active portfolio.

Each risk type is considered below in turn.

C.1 Underwriting risk

Underwriting Risk is defined as the financial and contractual risks involved when writing or administering insurance policies. Unmitigated, the risk exposure would have a large, material impact on the total risk exposure of TWGE Group.

Measures used to assess underwriting risk

Premium Risk, the risk that premiums are not sufficient to cover actual claims costs and expenses and to provide TWGE Group with an appropriate return for the risk taken:

- Expected premiums, claims and expenses (commissions and other acquisition costs, costs to service policyholders and fulfil claims and overheads) are projected three years ahead as part of the annual operating plan and forecast process. Variances between forecast and actual results are reviewed monthly by the senior management team and quarterly by the Board and actions identified and assigned.
- The impact of the 3-year plan on TWGE Group’s, LGI’s and LGL’s future solvency and economic capital position is modelled through the annual ORSA process.
- All new business proposals are assessed by the Pricing team against target returns on capital and approved by a committee including representatives from Risk and Compliance.

Reserve Risk, the risk that claims reserves are insufficient to cover the actual costs of claims that have been incurred:

- In calculating the estimated cost of unpaid claims, TWGE Group uses a variety of estimation techniques, generally based upon statistical analyses of historical experience, which assumes that the development pattern of the current claims will be consistent with past experience. Allowance is made, however, for changes or uncertainties which may create distortions in the underlying statistics, or which might cause the cost of unsettled claims to increase or reduce when compared with the cost of previously settled claims.

Reserve positions are reported at least half-yearly and monitored more regularly.

Underwriting risk exposure is also assessed and quantified in TWGE Group's Standard Formula solvency capital requirement calculation which is completed quarterly.

Material underwriting risks

Non-Life and Health Not Similar to Life Techniques

- TWGE Group issues non-life insurance policies through LGI with focus on the Auto (insured warranty and guaranteed asset protection) and A&T (consumer electronics and white goods accidental damage and extended mechanical of electrical breakdown warranty) markets.
- Fluctuation in the frequency and severity of insured events, both relating to policies that were underwritten in the period and to unexpired policies from previous periods, present the most material elements of underwriting risk for TWGE Group.
- In respect of non-life contracts, the business underwritten is generally low severity with limited exposure to catastrophe events. Although warranty policies are longer than 12 months in length, claims are reported, and decisions made quickly. Speed of payment of claims reduces the uncertainty surrounding the ultimate claim amounts and reduces the exposure to Reserve risk.
- The current cost-of-living crisis being experienced in the UK and the European Union due to increasing inflation is expected to lead to a reduction in sales and renewals as customers seek to tighten up the management of household finances.

Risk management

TWGE Group's underwriting and reserving policies applies to all companies within the TWGE Group. In general, the risk appetite of TWGE Group is to write high frequency, low severity business, or business where we have expertise to differentiate from competitors or complement non-insurance products.

TWGE Group has a range of contractual mitigations included within contracts. These include allowance for profit and loss shares with clients.

Due to the nature of the primary business lines insured, it is continually necessary to scan the horizon for emerging risks with regards to changes in customer behaviour and changes in technology. TWGE Group's commercial contracts contain controls to protect against any future change in the landscape.

Concentration of underwriting risk

TWGE Group's and insurance firms' policies are held by individuals across a number of clients and are not exposed to significant insurance concentration risk by location. TWGE Group does not have any material exposure to catastrophe risk.

Risk mitigations

TWGE Group can seek to use reinsurance treaties to limit underwriting exposure where it exceeds the limits set out in its Reinsurance policy. Any reinsurance treaty or negotiation of terms on existing treaties needs to comply with the requirements of the policy.

Two distinct types of reinsurance may be utilised:

- as a mechanism for sharing risks with individual client groups for certain products as part of the relevant commercial relationship ("Client-based Reinsurance"); and,
- for the purposes of broader risk and capital management ("Risk Management Reinsurance").

TWGE Group will consider any level of risk transfer as is appropriate to the situation.

TWGE Group does not normally seek to utilise risk mitigation techniques other than reinsurance. Should situations arise where other risk mitigation techniques are considered or present a significant opportunity these will be subject to a full business case review and approval as set out in the policy.

TWGE Group shall only utilise reinsurance where it provides effective risk transfer and risk mitigation in TWGE Group's solvency capital requirement calculations.

C.2 Market risk

Market risk is defined as the risk of loss or of adverse change in the financial situation resulting, directly or indirectly, from fluctuations in the level and in the volatility of market prices of assets, liabilities, and financial instruments.

Measures used to assess market risk

TWGE Group is exposed to market risk and exposures are monitored by the Treasury and Investment Forum and overseen by the ARCC. The factors that are likely to affect market risk include, but are not limited to, large fluctuations in, or changes to, expected interest rates, volatility in foreign exchange markets, sudden inflation/deflation, recession, conflict (war, terrorist attack), and political instability.

Management of the LGI investment portfolio is outsourced to the investment manager, which operates within the agreed mandates set in accordance with the risk appetite and subject to the prudent person principle. The TWGE Group Treasury function is responsible for monitoring the activities of the investment managers, as well as monitoring and reporting on performance to the Treasury & Investment forum. Material deviations from the mandate or expected risk appetite are escalated through the TWGE Group system of governance and to the Board (via the ARCC) if appropriate.

The investment portfolios are modelled through the annual ORSA process. Market risk exposure is also assessed and quantified in TWGE Group's Standard Formula solvency capital requirement calculation which is completed quarterly.

Material market risks

TWGE Group does not seek market risk as a means to increase revenue or profit. Market risk is a necessary aspect of managing the solvency of the business. TWGE Group is tolerant of market risk as a mechanism to fund policy liabilities and contribute to the growth of surplus and maintenance of capital requirements.

Included within market risk are:

Interest Rate Risk	The fair value of TWGE Group's portfolio of fixed income securities is inversely correlated to changes in the market interest rates. Therefore, if interest rates fall, the fair value of the portfolio would tend to rise and vice versa.
Currency Risk	TWGE Group operates in the UK and in other European countries, via its insurers, branches and through Freedom of Service. Accordingly, its net assets at group level are subject to currency risk. The primary foreign currency exposures are to Euro and United States Dollar. TWGE Group incurs currency risk in two ways: • Operational currency risk – by holding assets and by underwriting liabilities in currencies other than the currency of the primary environment in which the business units operate (non-functional currencies) • Structural currency risk – by operating overseas subsidiaries and branches where the currency of the primary environment differs to that of the principal business and being part of an international insurance group LGI only has business in the UK and Switzerland, and therefore the exposure to currency risk is low.
Spread Risk	Spread risk presents a material risk to the group and LGI in relation to their investments in corporate bond portfolios.
Property Risk	TWGE Group has a limited exposure to property risk because of the right-of-use assets recognised for the rental contracts of the offices of the Group subsidiaries. LGI and LGL have no exposure to property risk.
Equity Risk	TWGE Group and LGL had no exposure to equity risk in the year ended 31 December 2022. LGI holds a small investment in a subsidiary within the TWGE group.

Risk management

The investment portfolio is structured so that asset quality is a primary feature. As a result, the portfolio is limited to Government Bonds, Sovereign and Sub-Sovereign debt, Collateralised Securities, and investment grade Corporate Bonds which are actively traded.

Investments are required to be above investment grade (BBB-) at purchase. Those that fall below investment grade subsequently are investigated with subject matter experts and the costs of early exit are assessed against the risk of default.

The TWGE Group Board uses BlackRock to manage the investment portfolios of LGI and LGL respectively. TWGE Group's requirements for the management of its investment portfolio are stipulated in the Investment Management Agreement with the appointed investment manager.

The investment portfolio mandate reflects TWGE Group's risk appetite to mitigate spread risk, and investments are diversified by allocation and quality. The investment managers are given parameters against which they are measured quarterly.

Market risk to the investment portfolio is considered in real time. Risks to the value of investments are discussed quarterly with the investment manager.

Market prices of the assets held have been affected during 2022 by increasing inflation, interest rates and a negative market reaction to the UK Government's mini budget in October 2022, with a material reduction in market value experienced. No defaults were experienced in the portfolio and the market value movements continue to be monitored.

Operational and structural currency risk is managed within TWGE Group by broadly matching assets and liabilities by currency. Currency balance sheets are prepared and reviewed by management quarterly. With the establishment of the Dutch insurance companies within TWGE group during 2020, a significant proportion of the group's own funds are denominated in Euros and these are required to support and fund growth in the EU business.

Concentration of market risk

Concentration of market risk arises when too much exposure is held in assets which respond to similar risk factors. As noted above, TWGE Group seeks to diversify its market risk exposure and thereby limits concentration of market risk.

Prudent Person Principle

TWGE Group's investment practices incorporate the principle of 'Prudent Person'. Accordingly the Board requires that the investment manager appointed to manage the investment portfolio only invests in assets and financial instruments whose risks TWGE Group can properly identify, measure, monitor, manage, control and report, and appropriately take into account in the assessment of its overall solvency needs performed as part of the ORSA.

Risk mitigation techniques used for market risk

TWGE Group does not use any derivatives or other specific risk mitigation instruments to manage its market risk exposure.

C.3 Credit risk

TWGE Group, LGI and LGL are exposed to credit risk via:

- default or delay in payments due upon cash;
- reinsurance counterparties failing to meet financial obligations or entering into restructuring arrangements that may adversely affect reinsurance recoveries; and
- default or delay of repayment of loans and receivables.
- LGI and LGL are also exposed to credit risk in respect of amounts from other group companies

TWGE Group considers the credit risk of holding assets in interest bearing investments as part of market risk. Refer to the market risk section above for further information.

Measures used to assess credit risk

Exposures to all counterparties are analysed each quarter, assessed and quantified in TWGE Group's Standard Formula solvency capital requirement calculation. The output from the resulting analysis is presented to the ARCC, detailing any material changes from the previous period.

Material credit risks

TWGE Group's maximum exposure to credit risk is represented by the values of financial assets included in the balance sheet at any given point in time. See also section D1 for details of the financial assets for TWGE Group, LGI and LGL at the reporting period end.

No material defaults have occurred during the period.

Risk management

TWGE Group holds cash balances with a number of banks within Europe but diversifies its exposure to ensure that any bank failures do not materially impact liquidity.

Holdings must follow the internal standard, which requires cash holdings to be held in counterparties classified as investment grade or above by the main ratings agencies of Moody's and/or S&P.

Third party reinsurers are required to be credit scored at 'A-' (or equivalent) or be SII regulated in the EU, and in compliance with their solvency capital requirements, in order to be accepted unless appropriate collateral is provided to mitigate the exposure as laid out in the Reinsurance Policy.

TWGE Group extends payment terms to clients and will have significant amounts due from clients from time to time.

Concentration of credit risk

Balances outstanding with clients who collect premiums on TWGE Group's behalf generally represent the biggest credit exposures outside of cash holdings, but these can vary significantly, not only from client to client, but from time to time. These amounts are monitored on a monthly basis.

Investments in structured entities - money market funds

TWGE Group has some exposure to collective investments funds through its investment fund which is managed by external specialist investment managers and exposure is controlled through the investment management agreement.

The use of these products allows the TWGE Group to broaden the diversification of its investment portfolio in a cost-efficient manner.

Risk mitigation techniques used for credit risk

TWGE Group does not use any specific risk mitigation techniques in respect of credit risk.

C.4 Liquidity risk

Liquidity risk is defined as the risk that TWGE Group will have insufficient liquid assets available to meet liabilities as they fall due.

Measures used to assess liquidity risk

Liquidity risk is managed by TWGE Group's Treasury management team. Future working capital and regulatory capital requirements are forecast monthly. The TWGE Group Board conducts stress testing scenarios to examine the effect on liquidity levels of various adverse business conditions.

Material liquidity risk

TWGE Group's exposure to liquidity risks is related to its ability to convert and access its assets, and in particular deposits and cash and cash equivalents, its bond portfolio and its collective investment fund (money market) holdings.

The TWGE bond portfolio primarily comprises a mixture of UK and European government- and corporate-bonds with investment grade ratings. All the securities are in active markets and should be easily convertible into cash.

Deposits other than cash equivalents comprise short term, up to 30-day bank deposits which are accessible in shorter timescales if necessary. Early access would only result in the loss of more favourable interest returns.

Risk management

TWGE Group holds significant cash balances with a number of banks within Europe but diversifies its exposure to ensure that any bank failures do not materially impact liquidity. Bank cash holdings must follow the internal liquidity and concentration requirements.

TWGE Group seeks to maintain assets in classes which can be realised into cash easily with minimal impact on asset valuation. All investible assets should be readily realisable and convertible into cash.

Concentration of liquidity risk

TWGE Group has taken action to diversify its asset portfolio, accurately forecast cash flow and future liabilities and maintain access to funding from its US parent in order to mitigate liquidity risk.

Risk mitigation techniques used for liquidity risk

TWGE Group does not use any specific risk mitigation techniques in respect of liquidity risk.

Expected Profit in Future Premium

As required by Article 260(2) of the SII Directive, TWGE Group calculated the amount of expected profit in future premiums included in the calculation of best estimate technical provisions.

At the end of the reporting period the amount of expected profit in future premiums was as below:

Expected profit in future premiums £'000's	TWGE Group	LGI	LGL
As at 31 December 2022	8,074	-	-
As at 31 December 2021	6,390	-	-

C.5 Operational risk

TWGE Group is exposed to operational risk, which is defined as the risk of loss resulting from inadequate or failed internal processes, people, and systems or from external events. This includes the failure of key outsourcing arrangements, business disruption, fraud, and loss of key management.

This definition also includes legal risk and reputational risk, as the Group considers reputational risk critical to its franchise and therefore has adopted this broad definition of operational risk.

Measures used to assess operational risk

Operational risks are captured through TWGE Group's risk register and risk reporting processes as part of the RMF.

In assessing capital required in respect of operational risk the Standard Formula SCR uses earned premium and reserves as a proxy for exposure to operational risk. Quantification of operational risk on the business is also assessed through the stress and scenario testing carried out as part of the ORSA process.

Material operational risk

TWGE Group provides products to many individuals through direct brands, through networks of indirect dealers and under clients' own branding. It is critical to the success of the business, and in order to retain existing clients and attract new clients, that client and customer expectations in terms of service and product performance are met and that customer service is central to the operation. Service levels and other key indicators in both the customer contact centres and claims fulfilment supply chain are monitored closely by management to ensure that they continue to be met and that any issues that arise are dealt with. There is a risk that as businesses continue to deal with the ongoing consequences of COVID. high inflation and Brexit, particularly in relation to staff recruitment, that it becomes more difficult for TWGE to meet its SLAs. In this situation, the focus would be on continuing to provide a good customer experience. TWGE Group also continues to innovate new products and enhancements to existing products to improve and add value to the offering to clients and their customers.

Clients may be lost due to failure to meet service levels but also clients review and put contracts to a competitive tender process periodically (usually between 3 to 5 years depending on the length of the original contract) where service and product quality are key factors. Failure to meet the expectations of both clients and their customers or competitor action during a tender period could result in the loss of that client and have a material impact on the business.

As a result of the COVID-19 pandemic and changes in working practices, much of the operations has moved to working from home, increasing the reliance on IT systems and risk of fraud and cyber attacks. The change in working location has been managed well across the enterprise with local considerations reflected in the actions undertaken. This position is continually monitored with the focus being to protect customers and employees.

Risk management

TWGE Group has established policies, processes, and controls to manage and mitigate its key operational risks.

The process through which TWGE Group's operational risk universe is determined is captured in the Operational Risk Policy. This process safeguards the ongoing improvement of the control environment and ensures that operational risk is identifiable and mitigated as the Group continues to grow.

Risk mitigation techniques used for operational risk

TWGE Group has a comprehensive insurance programme that provides financial protection against the majority of material operational risks e.g. property cover, business interruption etc. There are no other specific risk mitigation techniques applied in respect of operational risk.

C.6 Other material risks

Inflation (Cost of Living)

The external environment has provided challenges and disruption to TWGE's Risk Profile through increasing inflation. This has impacts upon claims and other costs as well as on the market values of the insurer investment portfolios. Material market value losses have been experienced and whilst to date capital buffers have been more than sufficient to cover the volatility, scenario analysis is ongoing with support of the Enterprise investments team to ensure any further risk to solvency is understood.

The Group remains focused on supporting its employees and customers through these challenges whilst maintaining its operational and financial resilience.

C.7 Stress testing and sensitivity analysis

Stress and scenario testing are fundamental parts of TWGE's risk framework and is conducted via an annual process with the results documented in the Own Risk and Solvency Assessment (ORSA) report. Stress testing is based on a specific set of stresses applied to the business that quantify impact on the P&L and regulatory solvency that cover the spectrum of risk types to which the group is exposed. The stress test results focus on the impact on:

1. Profit;
2. Own funds;
3. Impact on SCR;
4. Resulting solvency margin.

Furthermore, stress testing provides comfort in the assessment of the SCR, ensuring that it remains appropriate and suitable against plausible stressed situations, by not fully exhausting capital above policy holder protection levels. Sensitivity testing is used to identify how sensitive the business is to small changes in key variables over a short timeframe. Sensitivities show the impact of standard incremental changes in parameters both up and down to the capital requirement, own funds and resultant solvency ratio.

In determining the appropriate stresses for testing, the Risk Function followed the following process:
- Reviewed TWGE's Strategic Objectives and Business Plan;
- Proposed and agreed TWGE's Key Risks with Senior Management;
- Reviewed financials – balance sheet and current business plan to determine key drivers;
- Considering the broader macro environment and the agreed key risks, generated a number of plausible stresses and scenarios for testing;
- Held a workshop with Senior Management to agree the appropriate stresses for testing;
- Consulted the Non-Executive Directors on the process applied and discussed the resulting tests.

The latest analysis shows that the most significant risks for the UK general insurer, LGI, within the TWGE group are an increase in loss ratio or an expense increase causing a reduction in own funds and therefore solvency ratio. Management and the Board consider this stress as significant but plausible and supports the focus on ongoing monitoring of loss ratio and expenses for the business.

TWGE Group manages its solvency ratio above 100% and uses the results of the stress testing to aid an appropriate level of buffer i.e. capital in excess of the requirement to be held. This is a key element of TWGE Group's capital management process. As such TWGE Group is able to withstand each of the stresses and scenarios identified within the assessment.

Under each stress, LGI would remain solvent and continue to hold a solvency position in excess of the buffer.

Reverse Stress Testing (RST) considers extreme situations that could render TWGE Group's business unviable and works backwards, analysing the triggers and associated controls that would mitigate against such an event.

TWGE Group has a number of management actions that can be implemented to address adverse situations.

C.8 Any other disclosures

There are no other matters to be disclosed.

D Valuation for Solvency Purposes

LGI and LGL prepare financial statements under UK generally accepted accounting principles (UK GAAP). No consolidated financial statements are prepared for the group as TWGE Group has taken advantage of the exemption from preparing consolidated financial statements, under Section 401 of Part 15 of the Companies Act 2006, as the results of the TWGE group are consolidated in the financial statements of the ultimate parent undertaking Assurant, Inc., which are publicly available.

Reference to “financial statements” below should be understood to refer to audited UK GAAP financial statements in respect of LGI and LGL and to unaudited UK GAAP financial statements in respect of TWGE Group.

Individual assets and liabilities are recognised and valued separately unless a legal right of set-off exists and the assets and liabilities will be settled on a net basis.

All valuations are made on the basis that TWGE Group, LGI and LGL are going concerns.

D.1 Assets

The material classes of assets shown on the SII Balance sheets, the SII values and values for the corresponding assets shown in the corresponding proforma or audited financial statements are summarised in the table below:

	Solvency II Balance Sheet			Financial Statements		
As at 31 December 2022 £’000’s	TWGE	LGI	LGL	TWGE	LGI	LGL
Goodwill & Intangible Assets	-	-	-	12,732	-	-
Deferred acquisition costs	-	-	-	47,601	22,953	-
Deferred tax assets	-	312	-	2,770	-	-
Property, plant & equipment held for own use	900	-	-	140	-	-
Investments, comprising:	**168,606**	**57,864**	**4,185**	**167,183**	**57,314**	**4,183**
Bonds comprising:	157,367	54,416	1,151	155,975	53,871	1,148
Government Bonds	15,611	7,034	1,001	15,543	6,988	998
Corporate Bonds	141,436	47,007	150	140,114	46,884	150
Collateralised securities	320	375	-	318	-	-
Equities – unlisted	-	2,319	-	-	2,319	-
Collective Investments Undertakings	11,239	1,129	3,034	11,208	1,124	3,034
Deposits other than cash equivalents	-	-	-	-	-	-
Loans and mortgages	-	-	-	-	-	-
Reinsurance recoverables	6,386	3,290	(3)	20,073	10,231	-
Deposits to cedants	-	-	-	-	-	-
Insurance and Intermediaries receivables	40,883	22,423	-	57,201	22,423	-
Reinsurance receivables	583	1,849	-	583	1,849	-

Receivables (trade, not insurance)	12,614	1,885	1,009	14,923	2,606	1,012
Cash and cash equivalents	64,411	11,613	501	64,411	11,613	501
Other assets	-	-	-	-	-	-
Total assets	**294,382**	**99,236**	**5,692**	**387,618**	**128,989**	**5,696**

As at 31 December 2021 £'000's	**Solvency II Balance Sheet** TWGE	LGI	LGL	**Financial Statements** TWGE	LGI	LGL
Goodwill & Intangible Assets	-	-	-	12,834	-	-
Deferred acquisition costs	-	-	-	43,668	22,953	-
Deferred tax assets	2,689	312	-	648	-	-
Property, plant & equipment held for own use	1,018	-	-	171	-	-
Investments, comprising:	**192,194**	**57,864**	**4,185**	**190,845**	**57,314**	**4,183**
Bonds comprising:	187,150	54,416	1,151	185,807	53,871	1,148
Government Bonds	23,920	7,034	1,001	23,777	6,988	998
Corporate Bonds	162,855	47,007	150	162,030	46,884	150
Collateralised securities	375	375	-	-	-	-
Equities – unlisted	-	2,319	-	-	2,319	-
Collective Investments Undertakings	5,044	1,129	3,034	5,038	1,124	3,034
Deposits other than cash equivalents	-	-	-	-	-	-
Loans and mortgages	-	-	-	-	-	-
Reinsurance recoverables	11,829	3,290	(3)	28,442	10,231	-
Deposits to cedants	-	-	-	-	-	-
Insurance and Intermediaries receivables	62,086	22,423	-	77,547	22,423	-
Reinsurance receivables	2,154	1,849	-	2,154	1,849	-
Receivables (trade, not insurance)	15,958	1,885	1,009	18,363	2,606	1,012
Cash and cash equivalents	48,025	11,616	501	48,025	11,613	501
Other assets	-	-	-	-	-	-
Total assets	**335,953**	**99,236**	**5,692**	**422,698**	**128,989**	**5,696**

Goodwill and Intangible Assets

On the SII balance sheet goodwill and intangible assets are valued at zero.

In the financial statements, goodwill represents the excess of acquisition costs over the net fair value of identifiable assets acquired and liabilities assumed in a business combination. The cost of the acquisition is the amount of cash paid and the fair value of other purchase consideration. Other intangible assets are initially recognised at cost.

Goodwill and other intangibles are amortised in the financial statements over the expected useful economic lives and tested for impairment at least annually.

Unlisted Equities

TWGE Group's unlisted equities are held at fair value on the SII balance sheet. In the financial statements the investments are held at the lower of cost and net realisable value. The only entity with unlisted equities on its balance sheet is LGI, which holds a small investment in a subsidiary within the TWGE group.

Deferred acquisition costs

The table above includes deferred acquisition costs, which are shown as a separate asset in the financial statements. In the financial statements acquisition costs comprise all direct and indirect costs arising from the conclusion of insurance contracts. Acquisition costs are deferred to the extent that they are recoverable out of future revenue margins and are amortised in accordance with the pattern of emergence of future related margins.

Under SII deferred acquisition costs are valued at zero.

Deferred tax assets

Deferred tax arises from timing differences that are differences between taxable profits and total comprehensive income. These timing differences arise from the inclusion of income and expense in tax assessments in periods different from those in which they are recognised in the financial statements.

Deferred tax is recognised on all timing differences at the reporting date except for certain exceptions. Unrelieved tax losses and other deferred tax assets are only recognised when it is probable that they will be recovered against the reversal of deferred tax liabilities or other future taxable profits.

Deferred tax is measured using tax rates that have been enacted or substantively enacted by the period end and that are expected to apply to the reversal of the timing difference.

Deferred tax assets are recognised on the same basis for SII and in the financial statements. However, valuation differences between SII and the financial statements, upon which the tax is calculated, for technical provisions and in respect of other assets and liabilities give rise, as far as the TWGE Group is concerned, to a reduction in the overall deferred tax assets.

The deferred tax assets arise due to net operating losses brought forward from prior years for tax purposes that are available to offset against future taxable profits. AEG reviews the likelihood of recovery of the deferred tax assets based on the expected profitability over the business planning horizon and with due regard to known changes in respect of the relevant tax regulation over that period.

Property, plant, and equipment held for own use

Property, plant, and equipment is held at depreciated cost in the financial statements. For SII, property, plant and equipment has been valued at net book value. Property leases have been recognised for Solvency II purposes at their right of use value as at year end.

Investments and Loans and mortgages

TWGE Group measures its investments at fair value on the SII balance sheet. The Group uses an exit price for its fair value measurements. An exit price is defined as the amount received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

Fair values of financial instruments traded in active markets are based on quoted bid prices on the balance sheet date. 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. If listed prices or quotations are not available, fair value is determined by reference to prices for similar instruments, quoted prices or recent transactions in less active markets, or internally developed models that primarily use, as inputs, market based or independently sourced parameters. All investments are valued based on quoted prices. A consistent valuation method was applied across all investments.

The difference between the SII value of investments in the table above is due to a difference in the classification of accrued investment income, which is recognised in investments for SII and Other assets in the financial statements.

Reinsurance recoverables

Reinsurance recoverables are valued according to the SII technical provision principles as explained in Section D2.

Deposits to cedants, insurance and Intermediaries receivables and reinsurance receivables

Receivables are measured at the undiscounted amount of the cash or other consideration expected to be received, net of any allowance for impairment.

Cash and cash equivalents

Cash and cash equivalents are recognised at fair value which is not considered to be materially different to cost.

Other Assets

Prepaid expenses and advance commissions represent the deferral of expenses paid for accounting purposes until they have been deemed to be consumed. In the SII balance sheet these assets are valued at zero unless the Group has a contractual ability to recover all or part of the asset from the third party in result of the termination of the arrangement. Where the group has such ability, the assets are recognised at the contractual amount recoverable less any allowance for impairment. These assets are recognised at amortised cost in the financial statements.

As noted above under “Investments and Loans and mortgages”, accrued investment income is reported as part of Other Assets in the financial statement but is included in the valuation of the related investment for SII reporting.

Any other assets are valued at fair value that is not considered to be materially different to the amortised cost basis as recorded per the financial statements.

Changes to the recognition and valuation bases

There have been no material changes to the recognition and valuation bases in the reporting period.

D.2 Technical provisions

Results

TWGE Group's technical provisions by material line of business as at 31 December 2022 are set out in reporting templates 12.01.02 Life and Health SLT Technical Provisions (for LGI and LGL) and also 17.01.02 Non-Life Technical Provisions (LGI and LGL).

As at 31 December 2022 £'000's	Fire and other damage to property*	Misc. financial loss	Health	Life	Total
TWGE Group					
Gross best estimate	5,100	32,176	20,582	1,852	59,709
Reinsurance recoverable	(3,054)	(3,263)	(61)	(7)	(6,386)
Net best estimate	2,046	28,912	20,520	1,844	53,323
Risk margin	65	2,869	2,873	151	5,958
Total technical provisions	2,111	31,782	23,393	1,995	59,281
LGI					
Gross best estimate	3,650	13,426			17,076
Reinsurance recoverable	(369)	18			(351)
Net best estimate	3,281	13,444			16,725
Risk margin	195	799			994
Total technical provisions	3,476	14,243			17,719
LGL					
Gross best estimate				-	-
Reinsurance recoverable				-	-
Net best estimate				-	-
Risk margin				-	-
Total technical provisions				-	-

*Including direct and proportional reinsurance

As at 31 December 2021 £'000's	Fire and other damage to property*	Misc. financial loss	Health	Life	Total
TWGE Group					
Gross best estimate	8,524	41,944	23,527	2,876	76,871
Reinsurance recoverable	(3,664)	(8,094)	(45)	(26)	(11,829)
Net best estimate	4,859	33,851	23,483	2,849	65,042
Risk margin	554	3,758	2,982	79	7,372
Total technical provisions	5,413	37,608	26,465	2,928	72,414
LGI					
Gross best estimate	3,037	15,095			18,133
Reinsurance recoverable	(669)	(2,621)			(3,290)
Net best estimate	2,368	12,474			14,843
Risk margin	272	1,472			1,744
Total technical provisions	2,640	13,947			16,587
LGL					
Gross best estimate				344	344
Reinsurance recoverable				3	3
Net best estimate				347	347
Risk margin				16	16
Total technical provisions				363	363

*Including direct and proportional reinsurance

Bases, methods, and main assumptions

Under Solvency II, liabilities must be valued at the amount for which they could be transferred between knowledgeable parties.

Technical provisions are defined as the sum of a best estimate and a risk margin. The best estimate is the probability-weighted average of all future cash flows and the risk margin is the cost of providing the solvency capital requirement necessary to support the liabilities.

The liabilities valued in the technical provisions are those associated with existing contracts at the valuation date. Under Solvency II, contracts must be valued if there is a legal obligation to provide cover even if this is before the commencement date of the policy which is different to the approach under UK GAAP.

The non-life business of TWGE is split into homogeneous risk groupings referred to as model points. These homogeneous risk groups split the business by currency, cover, underlying product and sometimes client.

The technical provisions for each model point are calculated using a cash-flow model. This is carried out by predicting the expected cash-flow for each model point separately for each future year until all existing contracts have expired.

Expenses are projected for the cash-flow projections and allocated between model points and currency and between earned and unearned exposure.

The best estimate is calculated separately for premium provisions and claim provisions. Premium provisions are established in respect of unearned exposure and claims provisions are established in respect of earned exposure.

Gross cash-flows are calculated separately from reinsurance cash flows to recognise if there are significant differences in the timing of these cash flows.

The best estimates are calculated separately for each material currency.

The assumptions underlying the calculation of the technical provisions are derived based on the assumption that AEI and LGI will continue to write new business, and that LGL and AEL will not write any new business.

The most material assumptions are those relating to the loss assumptions and the future earned premium. The loss assumptions are outputs from the existing claims reserving process and the future earned premium assumptions are reconciled with the financial statements.

The material assumptions used in the calculation of the Technical Provisions are approved by the Board annually.

Discounting

The yield curve is required in order to discount future cash-flows. This enables future cash flows to be evaluated in present-value terms. The present value of future liability cash-flows must be evaluated as part of the best estimate liabilities calculation. The yield curve, which is used in the discounting process, represents a risk-free curve.

The risk-free rate of return is the theoretical interest rate that could be earned on an absolutely risk-free investment over a specified period of time. In practice, there is no such thing as an absolutely risk-free investment, as even the most secure investments carry a very small amount of risk. Typically, government bond yields offer a good approximation to a risk-free rate of return. The risk-free rate of return varies according to the term and currency of an investment.

A different risk-free yield curve is required for each currency, in order to reflect the different cost of borrowing in different currencies. The yield curve is published by the Bank of England for the UK and by EIOPA for the European business.

The yield curve is defined based on the zero-coupon swap rates which are currently available in the market. Hence the yield curve assumptions are based on “up-to-date and credible information and realistic assumptions” and are consistent with Article 77 of the Solvency II Directive.

Risk Margin

The risk margin is the cost of providing an amount of eligible own funds equal to the Solvency Capital Requirement necessary to support the liabilities.

The Risk margin is the present value of the SCR discounted using the risk-free rate multiplied by the Cost of Capital rate of 6%.

The SCR at the valuation date is calculated using the standard formula. The calculation of the SCR assumes that the existing portfolio including all current reinsurance remains the same. The SCR for Risk Margin covers underwriting risk for the existing portfolio (i.e., no new business), the credit risk associated with reinsurance, intermediaries and policyholders and operational risk. Market risk is removed.

The calculation of the SCR for the Risk Margin calculation follows the same methodology as that used to calculate the SCR.

The SCR for future time periods, until the business is fully run off, is approximated based on the assumption that the SCR is proportional to the discounted cash flow excluding risk margin in future years.

The SCR for Risk Margin is calculated as a whole and is then allocated to line of business in order to be added to the discounted best estimate to calculate the total Technical Provision.

Risk Margins are not required in respect of reinsurance recoverable as risk margins are calculated at a net rate.

Data

The data underlying the calculation of the technical provisions is either taken from the operating systems or from financial statements and financial forecasts. The actuarial function extracts the information and conducts a detailed reconciliation of the data with that held on the source systems and the financial ledger. The process used by the actuarial function to ensure that the data underlying the calculation of the technical provisions is complete, accurate and appropriate for use is subject to external scrutiny as part of the audit process.

Level of uncertainty

There are several areas of uncertainty in the calculation of the Technical Provisions.

Claims reserving is carried out using standard actuarial methods of projecting the paid (or known) claims to estimate the ultimate claim experience. These methods are generally based on the assumption that the future experience will develop in the same way as historic experience. There is uncertainty in the actual future development patterns, for example due to changes in handling processes such as innovative ways to settle a claim as fast as possible.

Since the majority of the business in TWGE is related to physical property there is the key uncertainty of the severity of claims and the additional costs associated with this. The evolution of products such as electrical parts in electrical appliances may result in higher settlement amounts. The frequency and severity assumptions are derived using historic data and reviewed by the Reserving Forum prior to use in the calculation of the Technical Provisions.

The expense loading is calculated as a proportion of premium. The expenses and premiums in the business plan are compared to derive an expense loading (as a percentage of premium). This yields an estimated expense cash-flow for the technical provisions. The key area of uncertainty is the delivery of the expense savings, the impact of inflation, and the emergence of other unexpected costs that are not accounted for in the business plan.

Uncertainty in respect of other business is not material.

Differences between Solvency II and the valuation bases for financial statements

The most material assumptions used in the calculation of the Solvency II best estimates are based on existing Assurant processes which are the same as those used in the preparation of the financial statements.

The starting position of the Solvency II best estimate premium provision is the UK GAAP unearned exposures. Under Solvency II, additional adjustments are made as described below.

The premium provision is based on the probability- weighted average of future cashflows related to policies within contract boundaries whereas UK GAAP unearned premium reserve is an allocation of premium income to the remaining time to expiry of the insurance contracts already issued.

The main difference arises due to the recognition of BBNI policies in the Solvency II basis.

Claims Provision

The calculation of the Solvency II best estimate claims provision is based closely on the UK GAAP valuation. Under Solvency II, as applied in the UK, additional adjustments are made to allow for Events Not in Data (ENIDs), an estimate for unknown liabilities not yet captured by the actuarial estimates and discounting.

Risk Margin

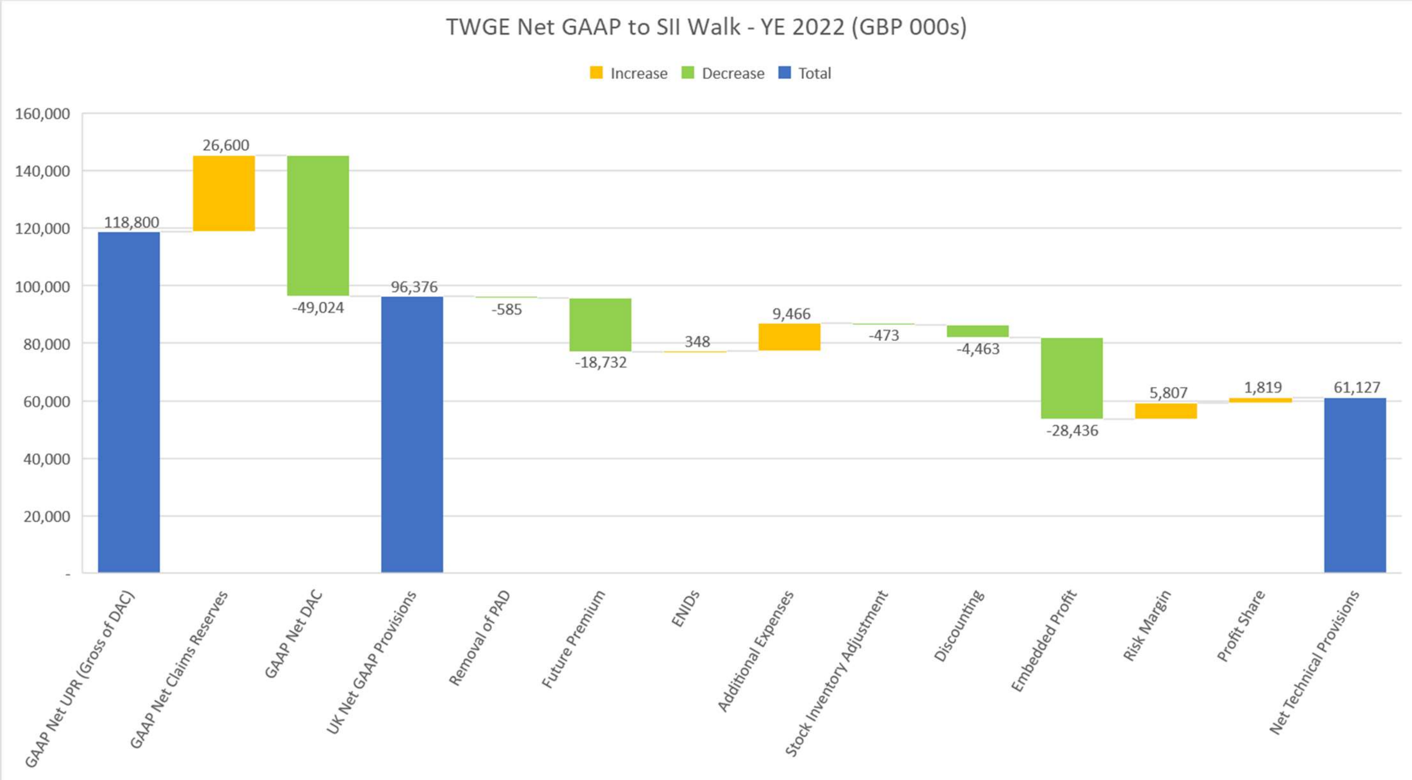
For Solvency II, risk margin is calculated using a cost of capital approach which involves calculating the cost of holding the SCR (per Standard Formula calculation) at each future time period until the technical provisions at the reporting date have run off. The amounts are then discounted back to the current time period. The calculation excludes new business and market risk.

No Risk Margin is recognised under UK GAAP and Dutch GAAP, however LGL historically recognised technical provisions on a Solvency II basis which includes risk margin.

Discounting

Under Solvency II the best estimate technical provisions are discounted but are undiscounted under UK GAAP.

The main differences between technical provisions as shown in the financial statements and the Solvency II technical provisions are shown in the chart below:



Matching Adjustment

TWGE Group has not applied the matching adjustment referred to in Article 77b of Directive 2009/138/EC.

Volatility adjustment

TWGE Group has not used the volatility adjustment referred to in Article 77d of Directive 2009/138/EC.

Transitional risk-free interest rate-term structure

TWGE Group (including LGI and LGL) has not applied the transitional risk-free interest rate-term structure referred to in Article 308c of Directive 2009/138/EC.

Transitional deductions

TWGE Group has not applied the transitional deduction referred to in Article 308d of Directive 2009/138/EC.

Reinsurance

Reinsurance recoverables represent the net discounted cash flow expected to be received from TWGE Group's reinsurers. TWGE Group utilises a variety of reinsurance treaties, primarily of a quota share nature, in order to share risk by ceding back to a client's captive or to remove risks underwritten that are outside of the group's appetite.

Material changes in the relevant assumptions made in the calculation of technical provisions

No material changes have arisen in the assumptions made in the calculation of technical provisions in the period.

D.3 Other liabilities

Solvency II Other Liabilities As at 31 December 2022 £'000	TWGE Group	LGI	LGL
Insurance creditors, reinsurance creditors, trade payables and other financial liabilities	86,591	21,002	3
Other liabilities	8,135	-	-
Total Other Liabilities	**94,725**	**21,002**	**3**

Financial Statements Other Liabilities As at 31 December 2022 £'000	TWGE Group	LGI	LGL
Insurance creditors, reinsurance creditors and trade payables	95,501	21,485	3
Other liabilities	349	197	-
Total Other Liabilities	**95,850**	**21,682**	**3**

Solvency II Other Liabilities As at 31 December 2021 £'000	TWGE Group	LGI	LGL
Insurance creditors, reinsurance creditors, trade payables and other financial liabilities	116,483	43,717	638
Other liabilities	11,037	-	-
Total Other Liabilities	**127,520**	**43,717**	**638**

Financial Statements Other Liabilities As at 31 December 2021 £'000	TWGE Group	LGI	LGL
Insurance creditors, reinsurance creditors and trade payables.	132,280	49,665	638
Other liabilities	318	148	-
Total Other Liabilities	**132,598**	**49,813**	**638**

Deferred tax liabilities

Deferred tax arises from timing differences that are differences between taxable profits and total comprehensive income. These timing differences arise from the inclusion of income and expense in tax assessments in periods different from those in which they are recognised in the financial statements.

Deferred tax is recognised on all timing differences at the reporting date except for certain exceptions.

Deferred tax is measured using tax rates that have been enacted or substantively enacted by the period end and that are expected to apply to the reversal of the timing difference.

Deferred tax liabilities are recognised on the same basis for SII and in the financial statements. However, valuation differences between SII and the financial statements, upon which the tax is calculated, for technical provisions and in respect of other assets and liabilities give rise to differences between the amounts reported.

The deferred tax liability in the TWGE Group proforma consolidated financial statements relates to deferred tax recognised in respect of goodwill and intangibles arising on consolidation that are being amortised to the UK GAAP profit and loss account over those assets' useful economic lives of up to 10 years. As the assets only arise on consolidation, they are not taxable and therefore give rise to a timing difference. Under SII the goodwill and intangible assets are valued at zero and therefore no deferred tax timing difference arises.

Deferred tax liabilities in the TWGE Group SII balance sheet arise due to the tax impact of the other SII valuation adjustments.

Insurance and Intermediary Payables, Trade Payables and Other Liabilities

For SII, liabilities other than technical provisions are valued at the amount for which they could be transferred, or settled, between knowledgeable willing parties in an arm's length transaction. When valuing liabilities, no adjustment to take account of the own credit standing of the issuer is made. In the financial statements, liabilities are valued at amortised cost.

There are no material differences between the valuation bases, methods and main assumptions used by TWGE Group, LGI or LGL for the valuation for solvency purposes and those used for the valuation in the relevant financial statements. The small differences in respect of Other Liabilities relates to reinsurance deferred acquisition costs which are valued at zero for SII (refer also to disclosure in respect of deferred acquisition costs in D.1.)

Other liabilities included above relate to accruals, deferred income, and other amounts payable that have not been categorised as insurance or trade payables for the purpose of reporting.

TWGE Group, LGI and LGL have no liabilities related to defined benefit pension schemes.

Changes to the recognition and valuation bases

There have been no material changes to the recognition and valuation bases in the reporting period.

D.4 Alternative methods for valuation

No alternative methods of valuation have been used.

D.5 Any other disclosures

There are no material differences between the valuation bases for the consolidated information provided for TWGE Group and those used for the solo entity information for LGI and LGL.

E Capital management

E.1 Own funds

Capital Management Policy

The TWGE Group internal capital target is to hold the Pillar 1 SCR, or the requirement identified during the ORSA process if higher, plus a Board approved buffer. Separate buffers are set for TWGE Group, LGI and LGL. The buffers to be held are set annually, having regard to the results of stress tests applied to projections over the three-year planning period. The Board will also consider whether to dividend any surplus capital above the target to TWGE Group's parent or to release capital out of the insurance firms for use elsewhere in the group.

TWGE Group's, LGI's and LGL's capital positions are formally assessed quarterly, and reported to the ARCC, to ensure that own funds continue to meet the internal capital requirements.

Own Funds

Available own funds for TWGE Group, LGI and LGL comprise:

As at 31 December 2022 **£'000**	TWGE Group	LGI	LGL
Tier 1	132,143	39,590	4,785
Tier 2	-	-	-
Tier 3	-	-	-
Available Own Funds	**132,143**	**39,590**	**4,785**

As at 31 December 2021 **£'000**	TWGE Group	LGI	LGL
Tier 1	121,501	35,331	4,695
Tier 2	-	-	-
Tier 3	2,689	312	-
Available Own Funds	**124,190**	**35,643**	**4,695**

Tier 1 own funds have three components: share capital, share premium and the reconciliation reserve. The reconciliation reserve comprises retained earnings and other distributable reserves as per the financial statements adjusted for SII valuation differences.

Tier 3 capital comprises deferred tax assets relating to timing differences and unutilised tax losses that are expected to be recovered against future taxable profits.

During the year, TWGE received a capital injection of £9m from its parent company, TWG Holdings, Inc. which was in turn invested as a capital contribution into LGI. As a result of these capital movements and despite their negative performance in the year, available own funds for TWGE Group and LGI were higher at year end by £10,907k and £3,948k, respectively.

LGL available own funds were £90k higher than 2021.

The amount of Tier 2 and Tier 3 own funds that are eligible to be set against the SCR is restricted to 50% and 15% of that requirement, respectively.

As at 31 December 2022 **£'000**	TWGE Group	LGI	LGL
Eligible Own Funds to meet the SCR	132,143	39,590	4,785
SCR	65,812	16,024	3,455
Solvency Ratio %	**201%**	**247%**	**138%**

As at 31 December 2021 **£'000**	TWGE Group	LGI	LGL
Eligible Own Funds to meet the SCR	124,190	35,643	4,695
SCR	64,062	16,104	3,126
Solvency Ratio %	**194%**	**221%**	**150%**

Eligible own funds to meet the MCR for TWGE Group, LGI and LGL are the same as available own funds, as shown below:

As at 31 December 2022 **£'000**	TWGE Group	LGI	LGL
Tier 1	132,143	39,590	4,785
Tier 2	-	-	-
Tier 3	-	-	-
Eligible Own Funds to meet the MCR	**132,143**	**39,590**	**4,785**

As at 31 December 2021 **£'000**	TWGE Group	LGI	LGL
Tier 1	121,501	35,331	4,695
Tier 2	-	-	-
Tier 3	-	-	-
Eligible Own Funds to meet the MCR	**121,501**	**35,331**	**4,695**

The main differences between equity as shown in the proforma or audited financial statements and the excess of assets over liabilities as calculated for solvency purposes are shown in the table below:

As at 31 December 2022 **£'000**	TWGE Group	LGI	LGL
Equity per financial statements	**127,872**	**41,501**	**4,785**
Valuation of goodwill and intangibles	(12,732)	-	-
Property, plant, and Equipment Valuation differences	(140)	-	-
Difference between the valuation of technical provisions on a UK GAAP basis and under Solvency II	23,656	(2,044)	-
Other valuation differences	(877)	(64)	-
Deferred tax adjustment	(5,637)	197	-
Excess of assets over liabilities for solvency purposes	**132,143**	**39,590**	**4,785**

As at 31 December 2021 **£'000**	TWGE Group	LGI	LGL
Equity per financial statements	**121,254**	**37,603**	**4,695**
Valuation of goodwill and intangibles	(12,834)	-	-
Property, plant, and Equipment Valuation differences	(171)	-	-
Difference between the valuation of technical provisions on a UK GAAP basis and under Solvency II	19,356	(2,194)	-
Other valuation differences	(1,239)	(226)	-
Deferred tax adjustment	(2,176)	460	-
Excess of assets over liabilities for solvency purposes	**124,190**	**35,643**	**4,695**

Other valuation differences relate to differences between assets and liabilities valued on a Solvency II basis or on a financial statements basis as discussed in sections D.1 and D.3.

TWGE Group own funds are calculated on an accounting consolidation basis. There are no items included in TWGE Group own funds that are issued by an undertaking other than TWGE, the group insurance holding company.

No deductions are applied to own funds and there are no significant restrictions affecting their availability and transferability.

Neither the TWGE Group's nor the SII firms' own funds are subject to transitional arrangements and none have ancillary own funds.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

The SCR and MCR for TWGE Group, LGI and LGL as at 31 December 2022 are:

As at 31 December 2022 **£'000**	TWGE Group	LGI	LGL
Market Risk	23,037	5,053	0
Counterparty Default Risk	12,916	2,830	321
Non-Life Underwriting Risk	41,516	11,292	-
Life Underwriting Risk	303	-	-

Health Underwriting Risk	2,000	-	-
Sum of risk modules	**79,771**	**19,175**	321
Diversification between risk modules	(19,521)	(4,053)	(0)
Basic SCR	**60,250**	**15,122**	**321**
Operational Risk	5,562	901	-
Standard Formula SCR	**65,812**	**16,024**	**321**
MCR	**23,339**	**5,164**	**3,455**

As at 31 December 2021 £'000	TWGE Group	LGI	LGL
Market Risk	19,112	4,708	289
Counterparty Default Risk	12,176	4,210	175
Non-Life Underwriting Risk	40,803	10,328	-
Life Underwriting Risk	614	-	44
Health Underwriting Risk	2,619	-	-
Sum of risk modules	**75,324**	**19,246**	**508**
Diversification between risk modules	(18,402)	(4,271)	(119)
Basic SCR	**56,922**	**14,975**	**389**
Operational Risk	7,140	1,129	2
Standard Formula SCR	**64,062**	**16,104**	**391**
MCR	**21,926**	**4,658**	**3,126**

LGL SCR is calculated using the Standard Formula. LGI makes use of an undertaking specific parameter which was approved by the PRA in 2016 to modify the standard formula.

The TWGE Group SCR is calculated on an accounting consolidation basis ("method 1") and relates to fully consolidated insurance undertakings, insurance holding companies and other ancillary service undertakings only. There are no components of the TWGE Group SCR arising from other entities.

The MCR has been calculated using the linear calculation as set out in the SII Directive and noted in the accompanying QRTs.

Details of the SCR and MCR calculations, including the MCR inputs and floor, are provided in QRTs S.25.01 and S.28.01 in Appendix F.

TWGE Group's SCR remained relatively stable in the year, with an increase of £1,750k. This is primarily driven by increased Market Risk, which is due to increases in the shock parameters provided by the relevant regulation. This relates to increases in the yield curve during 2022. The Market Risk increase has been reduced by diversification effects.

This movement has been somewhat offset by reductions in Operational Risk. An additional charge for growth, following the Part VII transfer, has reduced over time and has now stabilised at a lower level.

LGI's SCR decreased by £80k, with limited increase in market increase in market (for the uplift of risk-free rates) and non-life underwriting risk (for more favourable expectations of future premiums) and decrease in counterparty default risk (for the settlement of intra-group positions). The MCR for LGI is the linear MCR and therefore moves in line with the SCR.

LGL's SCR has fallen due to the cancellation of all the remaining policies and the divestment of all assets. However, as the SCR is below the MCR, SCR movements do not affect LGL's capital requirement.

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

Neither TWGE Group, LGI nor LGL make use of the duration-based equity risk sub-module in the calculation of the SCR.

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

The Standard Formula is used in the calculation of the TWGE group SCR and the solo SCRs for LGI and LGL.

E.5 Non-compliance with the minimum capital requirement and significant non-compliance with the solvency capital requirement

During the year there were no instances of non-compliance with either the SCR or MCR for TWGE Group, LGI or LGL.

E.6 Any other disclosures

No other matter to report.

F. Appendices

Public Group QRTs – TWG Europe Limited, London General Insurance Company Limited, London General Life Company Limited

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TWG Europe Limited

Balance sheet G.02.01.02

		Solvency II value
	Assets	C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	0
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	900
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	168,606
R0080	Property (other than for own use)	0
R0090	Holdings in related undertakings, including participations	0
R0100	Equities	0
R0110	Equities - listed	0
R0120	Equities - unlisted	0
R0130	Bonds	157,367
R0140	Government Bonds	15,611
R0150	Corporate Bonds	141,436
R0160	Structured notes	0
R0170	Collateralised securities	320
R0180	Collective Investments Undertakings	11,239
R0190	Derivatives	0
R0200	Deposits other than cash equivalents	0
R0210	Other investments	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	0
R0240	Loans on policies	0
R0250	Loans and mortgages to individuals	0
R0260	Other loans and mortgages	0
R0270	Reinsurance recoverables from:	6,386
R0280	Non-life and health similar to non-life	6,318
R0290	Non-life excluding health	6,318
R0300	Health similar to non-life	0
R0310	Life and health similar to life, excluding health and index-linked and unit-linked	69
R0320	Health similar to life	61
R0330	Life excluding health and index-linked and unit-linked	7
R0340	Life index-linked and unit-linked	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	40,883
R0370	Reinsurance receivables	583
R0380	Receivables (trade, not insurance)	12,614
R0390	Own shares (held directly)	0
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	64,410
R0420	Any other assets, not elsewhere shown	0
R0500	**Total assets**	294,382

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions – non-life	42,029
R0520	Technical provisions – non-life (excluding health)	42,029
R0530	TP calculated as a whole	0
R0540	Best Estimate	39,095
R0550	Risk margin	2,934
R0560	Technical provisions - health (similar to non-life)	0
R0570	TP calculated as a whole	0
R0580	Best Estimate	0
R0590	Risk margin	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	25,484
R0610	Technical provisions - health (similar to life)	23,455
R0620	TP calculated as a whole	0
R0630	Best Estimate	20,582
R0640	Risk margin	2,873
R0650	Technical provisions – life (excluding health and index-linked and unit-linked)	2,030
R0660	TP calculated as a whole	0
R0670	Best Estimate	1,879
R0680	Risk margin	151
R0690	Technical provisions – index-linked and unit-linked	0
R0700	TP calculated as a whole	0
R0710	Best Estimate	0
R0720	Risk margin	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	3,585
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	0
R0780	Deferred tax liabilities	3,245
R0790	Derivatives	0
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	1,305
R0820	Insurance & intermediaries payables	39,956
R0830	Reinsurance payables	14,058
R0840	Payables (trade, not insurance)	32,576
R0850	Subordinated liabilities	0
R0860	Subordinated liabilities not in Basic Own Funds	0
R0870	Subordinated liabilities in Basic Own Funds	0
R0880	Any other liabilities, not elsewhere shown	0
R0900	**Total liabilities**	162,239
R1000	**Excess of assets over liabilities**	132,143

Premiums. Claims and expenses by line of business - Table 1 G.05.01.02.01

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)		Total
		Fire and other damage to property insurance	Miscellaneous financial loss	
		C0070	C0120	C0200
	Premiums written			
R0110	Gross - Direct Business	134,526	37,347	171,872
R0120	Gross - Proportional reinsurance accepted	0	-2	-2
R0130	Gross - Non-proportional reinsurance accepted			0
R0140	**Reinsurers' share**	59,283	2,914	62,197
R0200	**Net**	75,243	34,431	109,674
	Premiums earned			
R0210	Gross - Direct Business	126,017	47,066	173,083
R0220	Gross - Proportional reinsurance accepted	0	39	39
R0230	Gross - Non-proportional reinsurance accepted			0
R0240	**Reinsurers' share**	55,174	8,917	64,091
R0300	**Net**	70,843	38,188	109,031
	Claims incurred			
R0310	Gross - Direct Business	34,381	8,280	42,661
R0320	Gross - Proportional reinsurance accepted	0	-20	-20
R0330	Gross - Non-proportional reinsurance accepted			0
R0340	**Reinsurers' share**	18,481	2,355	20,835
R0400	**Net**	15,900	5,906	21,806
	Changes in other technical provisions			
R0410	Gross - Direct Business	0	0	0
R0420	Gross - Proportional reinsurance accepted	0	0	0
R0430	Gross - Non- proportional reinsurance accepted			0
R0440	Reinsurers'share	0	0	0
R0500	Net	0	0	0
R0550	**Expenses incurred**	53,181	29,895	83,077
R1200	**Other expenses**			0
R1300	**Total expenses**			83,077

Premiums. Claims and expenses by line of business - Table 2

G.05.01.02.02

		Line of Business for: life insurance obligations		Total
		Health insurance	Other life insurance	
		C0210	C0240	C0300
	Premiums written			
R1410	Gross	5,835	341	6,176
R1420	**Reinsurers' share**	0	0	0
R1500	**Net**	5,835	341	6,176
	Premiums earned			
R1510	Gross	6,125	669	6,793
R1520	Reinsurers' share	1	3	4
R1600	Net	6,123	666	6,789
	Claims incurred			
R1610	Gross	2,057	110	2,167
R1620	**Reinsurers' share**	0	-9	-9
R1700	**Net**	2,057	119	2,177
	Changes in other technical provisions			
R1710	Gross	0	0	0
R1720	Reinsurers' share	0	0	0
R1800	Net	0	0	0
R1900	**Expenses incurred**	3,199	189	3,388
R2500	**Other expenses**			0
R2600	**Total expenses**			3,388

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TWG Europe Limited

Premiums. Claims and expenses by country G.05.02.01

		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
R0010			NL	ES	FR	HU	DE	
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
	Premiums written							
R0110	Gross - Direct Business	25,317	20,170	41,985	36,120	14,789	11,994	150,376
R0120	Gross - Proportional reinsurance accepted	0	0	-2	0	0	0	-2
R0130	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0140	**Reinsurers' share**	5,037	18,457	11,841	798	14,602	693	51,429
R0200	**Net**	20,280	1,713	30,143	35,321	187	11,301	98,945
	Premiums earned							
R0210	Gross - Direct Business	29,892	20,251	42,245	35,078	15,023	9,950	152,439
R0220	Gross - Proportional reinsurance accepted	10	0	-2	0	0	0	8
R0230	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0240	**Reinsurers' share**	7,274	18,459	10,153	1,083	14,680	180	51,829
R0300	**Net**	22,628	1,793	32,091	33,995	343	9,769	100,619
	Claims incurred							
R0310	Gross - Direct Business	7,007	4,541	11,137	5,563	5,888	1,899	36,035
R0320	Gross - Proportional reinsurance accepted	0	0	-20	0	0	0	-20
R0330	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0340	**Reinsurers' share**	1,706	4,854	2,788	106	5,848	15	15,316
R0400	**Net**	5,302	-313	8,329	5,457	41	1,884	20,699
	Changes in other technical provisions							
R0410	Gross - Direct Business	0	0	0	0	0	0	0
R0420	Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0
R0430	Gross - Non- proportional reinsurance accepted	0	0	0	0	0	0	0
R0440	Reinsurers'share	0	0	0	0	0	0	0
R0500	Net	0	0	0	0	0	0	0
R0550	**Expenses incurred**	21,917	63,655	0	0	0	0	85,572
R1200	**Other expenses**							0
R1300	**Total expenses**							85,572

		Home Country	Top 5 countries (by amount of gross premiums written) - life obligations					Total Top 5 and home country
		C0150	C0160	C0170	C0180	C0190	C0200	C0210
R1400			NL	BE	0	0	0	
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
	Premiums written							
R1410	Gross	0	5,781	395	0	0	0	6,176
R1420	**Reinsurers' share**	0	0	0	0	0	0	0
R1500	**Net**	0	5,781	395	0	0	0	6,176
	Premiums earned							
R1510	Gross	0	5,858	755	0	0	0	6,613
R1520	Reinsurers' share	0	0	0	0	0	0	0
R1600	Net	0	5,858	755	0	0	0	6,613
	Claims incurred							
R1610	Gross	0	2,088	179	0	0	0	2,268
R1620	**Reinsurers' share**	0	0	0	0	0	0	0
R1700	**Net**	0	2,088	179	0	0	0	2,268
	Changes in other technical provisions							
R1710	Gross	0	0	0	0	0	0	0
R1720	Reinsurers' share	0	0	0	0	0	0	0
R1800	Net	0	0	0	0	0	0	0
R1900	**Expenses incurred**	5	3,587	0	0	0	0	3,592
R2500	**Other expenses**							0
R2600	**Total expenses**							3,592

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
	Basic own funds before deduction for participations in other financial sector					
R0010	Ordinary share capital (gross of own shares)	75,109	75,109		0	
R0020	Non-available called but not paid in ordinary share capital at group level	0	0		0	
R0030	Share premium account related to ordinary share capital	0	0		0	
R0040	Iinitial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0060	Non-available subordinated mutual member accounts at group level	0		0	0	0
R0070	Surplus funds	0	0			
R0080	Non-available surplus funds at group level	0	0			
R0090	Preference shares	0		0	0	0
R0100	Non-available preference shares at group level	0		0	0	0
R0110	Share premium account related to preference shares	0		0	0	0
R0120	Non-available share premium account related to preference shares at group level	0		0	0	0
R0130	Reconciliation reserve	57,035	57,035			
R0140	Subordinated liabilities	0		0	0	0
R0150	Non-available subordinated liabilities at group level	0		0	0	0
R0160	An amount equal to the value of net deferred tax assets	0				0
R0170	The amount equal to the value of net deferred tax assets not available at the group level	0				0
R0180	Other items approved by supervisory authority as basic own funds not specified above	0	0	0	0	0
R0190	Non available own funds related to other own funds items approved by supervisory authority	0	0	0	0	0
R0200	Minority interests (if not reported as part of a specific own fund item)	0	0	0	0	0
R0210	Non-available minority interests at group level	0	0	0	0	0
	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					
R0220	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	0				
	Deductions					
R0230	Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities	0	0	0	0	0
R0240	whereof deducted according to art 228 of the Directive 2009/138/EC	0	0	0	0	
R0250	Deductions for participations where there is non-availability of information (Article 229)	0	0	0	0	0
R0260	Deduction for participations included by using D&A when a combination of methods is used	0	0	0	0	0
R0270	Total of non-available own fund items	0	0	0	0	0
R0280	**Total deductions**	0	0	0	0	0
R0290	**Total basic own funds after deductions**	132,143	132,143	0	0	0
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0			0	
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, cal	0			0	
R0320	Unpaid and uncalled preference shares callable on demand	0			0	0
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0			0	0
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0			0	
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0			0	0
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0			0	
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0			0	0
R0380	Non available ancillary own funds at group level	0			0	0
R0390	Other ancillary own funds	0			0	0
R0400	**Total ancillary own funds**	0			0	0
	Own funds of other financial sectors					
R0410	Credit institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies – total	0	0	0	0	
R0420	Institutions for occupational retirement provision	0	0	0	0	0
R0430	Non regulated entities carrying out financial activities	0	0	0	0	
R0440	Total own funds of other financial sectors	0	0	0	0	0
	Own funds when using the D&A, exclusively or in combination of method 1					
R0450	Own funds aggregated when using the D&A and combination of method	0	0	0	0	0
R0460	Own funds aggregated when using the D&A and a combination of method net of IGT	0	0	0	0	0
R0520	Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings incl	132,143	132,143	0	0	0
R0530	Total available own funds to meet the minimum consolidated group SCR	132,143	132,143	0	0	
R0560	Total eligible own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings includ	132,143	132,143	0	0	0
R0570	Total eligible own funds to meet the minimum consolidated group SCR	132,143	132,143	0	0	
	Consolidated Group SCR					
R0610	**Minimum consolidated Group SCR**	23,339				
R0630	**Ratio of Eligible own funds to the consolidated Group SCR (excluding other financial sectors and the undertakings included via D&A)**					
R0650	**Ratio of Eligible own funds to Minimum Consolidated Group SCR**	5.662				
R0660	**Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&A)**	132,143	132,143	0	0	0
R0670	**SCR for entities included with D&A method**					
R0680	**Group SCR**	65,812				
R0690	**Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A**	2.008				

		C0060
	Reconciliation reserve	
R0700	Excess of assets over liabilities	132,143
R0710	Own shares (held directly and indirectly)	0
R0720	Forseeable dividends, distributions and charges	0
R0730	Other basic own fund items	75,109
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0750	Other non available own funds	0
R0760	**Reconciliation reserve before deduction for participations**	57,035
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	0
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	8,074
R0790	**Total Expected profits included in future premiums (EPIFP)**	8,074

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Solvency Capital Requirement - for undertakings on Standard Formula — G.25.01.22

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	23,037		
R0020	Counterparty default risk	12,916		
R0030	Life underwriting risk	303		
R0040	Health underwriting risk	2,000		
R0050	Non-life underwriting risk	41,516		
R0060	Diversification	-19,521		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	60,250		

		C0100
	Calculation of Solvency Capital Requirement	
R0130	Operational risk	5,562
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	0
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency capital requirement excluding capital add-on**	65,812
R0210	Capital add-on already set	0
R0220	**Solvency capital requirement**	65,812
	Other information on SCR	
R0400	Capital requirement for duration-based equity risk sub-module	0
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	0
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0
R0470	Minimum consolidated group solvency capital requirement	23,339
	Information on other entities	
R0500	Capital requirement for other financial sectors (Non-insurance capital requirements)	0
R0510	Capital requirement for other financial sectors (Non-insurance capital requirements) - Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies	0
R0520	Capital requirement for other financial sectors (Non-insurance capital requirements) - Institutions for occupational retirement provisions	0
R0530	Capital requirement for other financial sectors (Non-insurance capital requirements) - Capital requirement for non-regulated entities carrying out financial activities	0
R0540	Capital requirement for non-controlled participation requirements	0
R0550	Capital requirement for residual undertakings	0
	Overall SCR	
R0560	SCR for undertakings included via D and A	0
R0570	**Solvency capital requirement**	65,812

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Undertakings in the scope of the group G.32.01.22

Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority	% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	YES/NO	Date of decision if art. 214 is applied	Method used and under method 1, treatment of the undertaking
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
GB	213800QOT4WOYBK3SN79	LEI	London General Insurance Company Limited	2	limited by shares	2	Prudential Regulation Authority	1.0000	1.0000	1.0000		1	1.0000	1		1
GB	213800HE9OSV4773SU18	LEI	London General Life Company Limited	1	limited by shares	2	Prudential Regulation Authority	1.0000	1.0000	1.0000		1	1.0000	1		1
GB	213800UHNTC599U19T78	LEI	TWG Services Limited	10	limited by shares	2	Financial Conduct Authority	1.0000	1.0000	1.0000		1	1.0000	1		1
GB	213800DN9XK5ME6AVH90	LEI	TWG Europe Limited	5	limited by shares	2		0.0000	0.0000	0.0000			0.0000	1		1
NL	2138006B4XXOR3EPC592	LEI	ASSURANT EUROPE INSURANCE N.V.	2	limited by shares	2	De Nederlandsche Bank	1.0000	1.0000	1.0000		1	1.0000	1		1
NL	213800AKZ9URZ73DRS89	LEI	ASSURANT EUROPE LIFE INSURANCE N.V.	1	limited by shares	2	De Nederlandsche Bank	1.0000	1.0000	1.0000		1	1.0000	1		1
NL	213800T8HSSCZXQJXY64	LEI	ASSURANT EUROPE SERVICES B.V.	10	limited by shares	2	Autoriteit Financiele Markten	1.0000	1.0000	1.0000		1	1.0000	1		1

Balance sheet

P.02.01.02

		Solvency II value
	Assets	C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	0
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	51,801
R0080	Property (other than for own use)	0
R0090	Holdings in related undertakings, including participations	0
R0100	Equities	2,319
R0110	Equities - listed	0
R0120	Equities - unlisted	2,319
R0130	Bonds	49,483
R0140	Government Bonds	5,905
R0150	Corporate Bonds	43,257
R0160	Structured notes	0
R0170	Collateralised securities	320
R0180	Collective Investments Undertakings	0
R0190	Derivatives	0
R0200	Deposits other than cash equivalents	0
R0210	Other investments	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	0
R0240	Loans on policies	0
R0250	Loans and mortgages to individuals	0
R0260	Other loans and mortgages	0
R0270	Reinsurance recoverables from:	351
R0280	Non-life and health similar to non-life	351
R0290	Non-life excluding health	351
R0300	Health similar to non-life	0
R0310	Life and health similar to life, excluding health and index-linked and unit-linked	0
R0320	Health similar to life	0
R0330	Life excluding health and index-linked and unit-linked	0
R0340	Life index-linked and unit-linked	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	416
R0370	Reinsurance receivables	258
R0380	Receivables (trade, not insurance)	5,720
R0390	Own shares (held directly)	0
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	20,115
R0420	Any other assets, not elsewhere shown	0
R0500	**Total assets**	78,661

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions – non-life	18,069
R0520	Technical provisions – non-life (excluding health)	18,069
R0530	TP calculated as a whole	0
R0540	Best Estimate	17,075
R0550	Risk margin	993
R0560	Technical provisions - health (similar to non-life)	0
R0570	TP calculated as a whole	0
R0580	Best Estimate	0
R0590	Risk margin	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	Technical provisions - health (similar to life)	0
R0620	TP calculated as a whole	0
R0630	Best Estimate	0
R0640	Risk margin	0
R0650	Technical provisions – life (excluding health and index-linked and unit-linked)	0
R0660	TP calculated as a whole	0
R0670	Best Estimate	0
R0680	Risk margin	0
R0690	Technical provisions – index-linked and unit-linked	0
R0700	TP calculated as a whole	0
R0710	Best Estimate	0
R0720	Risk margin	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	0
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	0
R0780	Deferred tax liabilities	0
R0790	Derivatives	0
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	6,563
R0830	Reinsurance payables	0
R0840	Payables (trade, not insurance)	14,439
R0850	Subordinated liabilities	0
R0860	Subordinated liabilities not in Basic Own Funds	0
R0870	Subordinated liabilities in Basic Own Funds	0
R0880	Any other liabilities, not elsewhere shown	0
R0900	**Total liabilities**	39,070
R1000	**Excess of assets over liabilities**	39,590

Premiums. Claims and expenses by line of business - Table 1 P.05.01.02.01

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)		Total
		Fire and other damage to property insurance	Miscellaneous financial loss	
		C0070	C0120	C0200
	Premiums written			
R0110	Gross - Direct Business	5,977	19,341	25,317
R0120	Gross - Proportional reinsurance accepted	0	-2	-2
R0130	Gross - Non-proportional reinsurance accepted			0
R0140	**Reinsurers' share**	3,441	1,596	5,037
R0200	**Net**	2,535	17,743	20,278
	Premiums earned			
R0210	Gross - Direct Business	6,962	23,013	29,975
R0220	Gross - Proportional reinsurance accepted	0	39	39
R0230	Gross - Non-proportional reinsurance accepted			0
R0240	**Reinsurers' share**	3,850	3,424	7,274
R0300	**Net**	3,112	19,628	22,739
	Claims incurred			
R0310	Gross - Direct Business	2,180	4,832	7,012
R0320	Gross - Proportional reinsurance accepted	0	-20	-20
R0330	Gross - Non-proportional reinsurance accepted			0
R0340	**Reinsurers' share**	967	738	1,706
R0400	**Net**	1,212	4,074	5,286
	Changes in other technical provisions			
R0410	Gross - Direct Business	0	0	0
R0420	Gross - Proportional reinsurance accepted	0	0	0
R0430	Gross - Non- proportional reinsurance accepted			0
R0440	Reinsurers'share	0	0	0
R0500	Net	0	0	0
R0550	**Expenses incurred**	2,206	17,217	19,422
R1200	**Other expenses**			0
R1300	**Total expenses**			19,422

Premiums. Claims and expenses by line of business - Table 2 P.05.01.02.02

		Line of Business for: life insurance obligations Health insurance	Total
		C0210	C0300
	Premiums written		
R1410	Gross	-1	-1
R1420	**Reinsurers' share**	0	0
R1500	**Net**	-1	-1
	Premiums earned		
R1510	Gross	19	19
R1520	Reinsurers' share	0	0
R1600	Net	19	19
	Claims incurred		
R1610	Gross	-3	-3
R1620	**Reinsurers' share**	0	0
R1700	**Net**	-3	-3
	Changes in other technical provisions		
R1710	Gross	0	0
R1720	Reinsurers' share	0	0
R1800	Net	0	0
R1900	**Expenses incurred**	25	25
R2500	**Other expenses**		0
R2600	**Total expenses**		25

Non-life Technical Provisions

P.17.01.02

		Direct business and accepted proportional reinsurance		
		Fire and other damage to property insurance	Miscellaneous financial loss	Total Non-Life obligation
		C0080	C0130	C0180
R0010	**Technical provisions calculated as a whole**	0	0	0
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	0	0	0
	Technical provisions calculated as a sum of BE and RM			
	Best estimate			
	Premium provisions			
R0060	Gross	3,419	12,824	16,243
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	265	-18	246
R0150	Net Best Estimate of Premium Provisions	3,154	12,843	15,997
	Claims provisions			
R0160	Gross	231	602	832
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	105	0	105
R0250	Net Best Estimate of Claims Provisions	126	602	728
R0260	**Total Best estimate - gross**	3,650	13,426	17,075
R0270	**Total Best estimate - net**	3,280	13,444	16,724
R0280	**Risk margin**	195	799	993
	Amount of the transitional on Technical Provisions			
R0290	Technical Provisions calculated as a whole	0	0	0
R0300	Best estimate	0	0	0
R0310	Risk margin	0	0	0
	Technical provisions - total			
R0320	Technical provisions - total	3,844	14,224	18,069
R0330	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	369	-18	351
R0340	Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	3,475	14,243	17,718

Total Non-Life Business

Z0020	Accident year / Underwriting year	**Z0020**	Accident year [AY]

Gross Claims Paid (non-cumulative)
(absolute amount)

Development year

	Year	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10 & +**	**In Current year**	**Sum of years (cumulative)**
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
R0100	**Prior**											0	0	0
R0160	**N-9**	121,619	12,915	485	449	118	50	43	0	6	0		0	135,684
R0170	**N-8**	117,242	7,460	938	315	100	76	1	7	0			0	126,140
R0180	**N-7**	69,026	7,744	550	112	87	33	11	0				0	77,563
R0190	**N-6**	55,863	5,591	208	122	127	11	0					0	61,921
R0200	**N-5**	53,069	5,248	406	258	11	0						0	58,992
R0210	**N-4**	31,912	4,724	535	11	0							0	37,182
R0220	**N-3**	25,849	3,103	142	5								5	29,100
R0230	**N-2**	19,679	1,238	59									59	20,976
R0240	**N-1**	8,039	548										548	8,587
R0250	**N**	6,675											6,675	6,675
R0260												**Total**	7,287	562,820

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

Development year

	Year	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10 & +**	**Year end (discounted data)**
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
R0100	**Prior**											0	0
R0160	**N-9**	19,983	1,214	285	40	5	5	7	3	0	0		0
R0170	**N-8**	16,348	799	42	23	13	81	0	0	0			0
R0180	**N-7**	12,587	339	55	16	115	1	0	0				0
R0190	**N-6**	16,809	448	195	287	0	0	0					0
R0200	**N-5**	12,589	379	191	4	1	0						0
R0210	**N-4**	9,815	396	17	1	1							1
R0220	**N-3**	6,648	1	6	3								3
R0230	**N-2**	2,097	35	11									10
R0240	**N-1**	1,061	27										24
R0250	**N**	866											794
R0260												**Total**	832

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35					
R0010	Ordinary share capital (gross of own shares)	43,000	43,000		0	
R0030	Share premium account related to ordinary share capital	0	0		0	
R0040	Iinitial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0070	Surplus funds	0	0			
R0090	Preference shares	0		0	0	0
R0110	Share premium account related to preference shares	0		0	0	0
R0130	Reconciliation reserve	-3,410	-3,410			
R0140	Subordinated liabilities	0		0	0	0
R0160	An amount equal to the value of net deferred tax assets	0				0
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					
R0220	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	0				
	Deductions					
R0230	Deductions for participations in financial and credit institutions	0	0	0	0	0
R0290	**Total basic own funds after deductions**	39,590	39,590	0	0	0
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0			0	
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0			0	
R0320	Unpaid and uncalled preference shares callable on demand	0			0	0
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0			0	0
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0			0	
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0			0	0
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0			0	
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0			0	0
R0390	Other ancillary own funds	0			0	0
R0400	**Total ancillary own funds**	0			0	0
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	39,590	39,590	0	0	0
R0510	Total available own funds to meet the MCR	39,590	39,590	0	0	
R0540	Total eligible own funds to meet the SCR	39,590	39,590	0	0	0
R0550	Total eligible own funds to meet the MCR	39,590	39,590	0	0	
R0580	**SCR**	16,024				
R0600	**MCR**	5,164				
R0620	**Ratio of Eligible own funds to SCR**	2.4707				
R0640	**Ratio of Eligible own funds to MCR**	7.6670				

		C0060
	Reconciliation reserve	
R0700	Excess of assets over liabilities	39,590
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	0
R0730	Other basic own fund items	43,000
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0760	**Reconciliation reserve**	-3,410
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	0
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	0
R0790	**Total Expected profits included in future premiums (EPIFP)**	0

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Solvency Capital Requirement - for undertakings on Standard Formula | P.25.01.21

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	5,053		
R0020	Counterparty default risk	2,830		
R0030	Life underwriting risk	0		
R0040	Health underwriting risk	0		
R0050	Non-life underwriting risk	11,292		
R0060	Diversification	-4,053		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	15,122		

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	901
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	0
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency capital requirement excluding capital add-on**	16,024
R0210	Capital add-on already set	0
R0220	**Solvency capital requirement**	16,024
	Other information on SCR	
R0400	Capital requirement for duration-based equity risk sub-module	0
R0410	Total amount of Notional Solvency Capital Requirement for remaining part	0
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0
R0430	Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	0
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0

	Approach to tax rate	**Yes/No** C0109
R0590	Approach based on average tax rate	3 - Not applicable as LAC DT is not used (in this case R0600 to R0690 are not applicable)

	Calculation of loss absorbing capacity of deferred taxes	**LAC DT** C0130
R0600	DTA	
R0610	DTA carry forward	
R0620	DTA due to deductible temporary differences	
R0630	DTL	
R0640	LAC DT	0
R0650	LAC DT justified by reversion of deferred tax liabilities	0
R0660	LAC DT justified by reference to probable future taxable economic profit	0
R0670	LAC DT justified by carry back, current year	0
R0680	LAC DT justified by carry back, future years	0
R0690	Maximum LAC DT	0

Minimum Capital Requirement - only life or only non-life or reinsurance activity P.28.01.01

Linear formula component for non-life insurance and reinsurance obligations

		C0010
R0010	MCRNL Result	5,164

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
R0020	Medical expenses insurance and proportional reinsurance	0	0
R0030	Income protection insurance and proportional reinsurance	0	0
R0040	Workers' compensation insurance and proportional reinsurance	0	0
R0050	Motor vehicle liability insurance and proportional reinsurance	0	0
R0060	Other motor insurance and proportional reinsurance	0	0
R0070	Marine, aviation and transport insurance and proportional reinsurance	0	0
R0080	Fire and other damage to property insurance and proportional reinsurance	3,280	2,535
R0090	General liability insurance and proportional reinsurance	0	0
R0100	Credit and suretyship insurance and proportional reinsurance	0	0
R0110	Legal expenses insurance and proportional reinsurance	0	0
R0120	Assistance and proportional reinsurance	0	0
R0130	Miscellaneous financial loss insurance and proportional reinsurance	13,444	17,743
R0140	Non-proportional health reinsurance	0	0
R0150	Non-proportional casualty reinsurance	0	0
R0160	Non-proportional marine, aviation and transport reinsurance	0	0
R0170	Non-proportional property reinsurance	0	0

Linear formula component for life insurance and reinsurance obligations

		C0040
R0200	MCRL Result	0

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits	0	
R0220	Obligations with profit participation - future discretionary benefits	0	
R0230	Index-linked and unit-linked insurance obligations	0	
R0240	Other life (re)insurance and health (re)insurance obligations	0	
R0250	Total capital at risk for all life (re)insurance obligations		0

	Overall MCR calculation	C0070
R0300	Linear MCR	5,164
R0310	SCR	16,024
R0320	MCR cap	7,211
R0330	MCR floor	4,006
R0340	Combined MCR	5,164
R0350	Absolute floor of the MCR	6,889

		C0070
R0400	**Minimum Capital Requirement**	6,889

Balance sheet

P.02.01.02

		Solvency II value
	Assets	C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	0
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	0
R0080	Property (other than for own use)	0
R0090	Holdings in related undertakings, including participations	0
R0100	Equities	0
R0110	Equities - listed	0
R0120	Equities - unlisted	0
R0130	Bonds	0
R0140	Government Bonds	0
R0150	Corporate Bonds	0
R0160	Structured notes	0
R0170	Collateralised securities	0
R0180	Collective Investments Undertakings	0
R0190	Derivatives	0
R0200	Deposits other than cash equivalents	0
R0210	Other investments	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	0
R0240	Loans on policies	0
R0250	Loans and mortgages to individuals	0
R0260	Other loans and mortgages	0
R0270	Reinsurance recoverables from:	0
R0280	Non-life and health similar to non-life	0
R0290	Non-life excluding health	0
R0300	Health similar to non-life	0
R0310	Life and health similar to life, excluding health and index-linked and unit-linked	0
R0320	Health similar to life	0
R0330	Life excluding health and index-linked and unit-linked	0
R0340	Life index-linked and unit-linked	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	0
R0370	Reinsurance receivables	0
R0380	Receivables (trade, not insurance)	0
R0390	Own shares (held directly)	0
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	4,787
R0420	Any other assets, not elsewhere shown	0
R0500	**Total assets**	4,787

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions – non-life	0
R0520	Technical provisions – non-life (excluding health)	0
R0530	TP calculated as a whole	0
R0540	Best Estimate	0
R0550	Risk margin	0
R0560	Technical provisions - health (similar to non-life)	0
R0570	TP calculated as a whole	0
R0580	Best Estimate	0
R0590	Risk margin	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	Technical provisions - health (similar to life)	0
R0620	TP calculated as a whole	0
R0630	Best Estimate	0
R0640	Risk margin	0
R0650	Technical provisions – life (excluding health and index-linked and unit-linked)	0
R0660	TP calculated as a whole	0
R0670	Best Estimate	0
R0680	Risk margin	0
R0690	Technical provisions – index-linked and unit-linked	0
R0700	TP calculated as a whole	0
R0710	Best Estimate	0
R0720	Risk margin	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	0
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	0
R0780	Deferred tax liabilities	0
R0790	Derivatives	0
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	0
R0830	Reinsurance payables	0
R0840	Payables (trade, not insurance)	3
R0850	Subordinated liabilities	0
R0860	Subordinated liabilities not in Basic Own Funds	0
R0870	Subordinated liabilities in Basic Own Funds	0
R0880	Any other liabilities, not elsewhere shown	0
R0900	**Total liabilities**	3
R1000	**Excess of assets over liabilities**	4,785

Premiums. Claims and expenses by line of business - Table 2 P.05.01.02.02

		Line of Business for: life insurance obligations — Other life insurance	Total
		C0240	C0300
	Premiums written		
R1410	Gross	0	0
R1420	**Reinsurers' share**	0	0
R1500	**Net**	0	0
	Premiums earned		
R1510	Gross	0	0
R1520	Reinsurers' share	0	0
R1600	Net	0	0
	Claims incurred		
R1610	Gross	0	0
R1620	**Reinsurers' share**	0	0
R1700	**Net**	0	0
	Changes in other technical provisions		
R1710	Gross	0	0
R1720	Reinsurers' share	0	0
R1800	Net	0	0
R1900	**Expenses incurred**	-97	-97
R2500	**Other expenses**		0
R2600	**Total expenses**		-97

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Own funds						P.23.01.01
		Total	**Tier 1 - unrestricted**	**Tier 1 - restricted**	**Tier 2**	**Tier 3**
		C0010	C0020	C0030	C0040	C0050
	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35					
R0010	Ordinary share capital (gross of own shares)	4,050	4,050		0	
R0030	Share premium account related to ordinary share capital	0	0		0	
R0040	Iinitial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0070	Surplus funds	0	0			
R0090	Preference shares	0		0	0	0
R0110	Share premium account related to preference shares	0		0	0	0
R0130	Reconciliation reserve	735	735			
R0140	Subordinated liabilities	0		0	0	0
R0160	An amount equal to the value of net deferred tax assets	0				0
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					
R0220	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	0				
	Deductions					
R0230	Deductions for participations in financial and credit institutions	0	0	0	0	0
R0290	**Total basic own funds after deductions**	4,785	4,785	0	0	0
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0			0	
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0			0	
R0320	Unpaid and uncalled preference shares callable on demand	0			0	0
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0			0	0
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0			0	
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0			0	0
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0			0	
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0			0	0
R0390	Other ancillary own funds	0			0	0
R0400	**Total ancillary own funds**	0			0	0
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	4,785	4,785	0	0	0
R0510	Total available own funds to meet the MCR	4,785	4,785	0	0	
R0540	Total eligible own funds to meet the SCR	4,785	4,785	0	0	0
R0550	Total eligible own funds to meet the MCR	4,785	4,785	0	0	
R0580	**SCR**	321				
R0600	**MCR**	3,445				
R0620	**Ratio of Eligible own funds to SCR**	14.903				
R0640	**Ratio of Eligible own funds to MCR**	1.389				

		C0060
	Reconciliation reserve	
R0700	Excess of assets over liabilities	4,785
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	0
R0730	Other basic own fund items	4,050
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0760	**Reconciliation reserve**	735
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	0
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	0
R0790	**Total Expected profits included in future premiums (EPIFP)**	0

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Solvency Captial Requirement - for undertakings on Standard Formula P.25.01.21

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	0		
R0020	Counterparty default risk	321		
R0030	Life underwriting risk	0		
R0040	Health underwriting risk	0		
R0050	Non-life underwriting risk	0		
R0060	Diversification	0		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	321		

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	0
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	0
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency capital requirement excluding capital add-on**	321
R0210	Capital add-on already set	0
R0220	**Solvency capital requirement**	321
	Other information on SCR	
R0400	Capital requirement for duration-based equity risk sub-module	0
R0410	Total amount of Notional Solvency Capital Requirement for remaining part	0
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0
R0430	Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	0
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0

		Yes/No
	Approach to tax rate	C0109
R0590	Approach based on average tax rate	3 - Not applicable as LAC DT is not used (in this case R0600 to R0690 are not applicable)

		LAC DT
	Calculation of loss absorbing capacity of deferred taxes	C0130
R0600	DTA	
R0610	DTA carry forward	
R0620	DTA due to deductible temporary differences	
R0630	DTL	
R0640	LAC DT	0
R0650	LAC DT justified by reversion of deferred tax liabilities	0
R0660	LAC DT justified by reference to probable future taxable economic profit	0
R0670	LAC DT justified by carry back, current year	0
R0680	LAC DT justified by carry back, future years	0
R0690	Maximum LAC DT	0

Minimum Capital Requirement - only life or only non-life or reinsurance activity P.28.01.01

Linear formula component for non-life insurance and reinsurance obligations

		C0010
R0010	MCRNL Result	0

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

Linear formula component for life insurance and reinsurance obligations

		C0040
R0200	MCRL Result	1

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits	0	
R0220	Obligations with profit participation - future discretionary benefits	0	
R0230	Index-linked and unit-linked insurance obligations	0	
R0240	Other life (re)insurance and health (re)insurance obligations	0	
R0250	Total capital at risk for all life (re)insurance obligations		942

	Overall MCR calculation	C0070
R0300	Linear MCR	1
R0310	SCR	321
R0320	MCR cap	144
R0330	MCR floor	80
R0340	Combined MCR	80
R0350	Absolute floor of the MCR	3,445

		C0070
R0400	**Minimum Capital Requirement**	3,445