White Horse
Insurance Ireland dac

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Solvency and Financial Condition Report ("SFCR")

Financial year end December 31 2019

White Horse
Insurance Ireland dac

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SUMMARY

This report provides an overview of the business and performance of White Horse Insurance Ireland dac ("**White Horse**" or "**the Company**"), covering its system of governance, risk profile, valuation for solvency purposes and capital management. The ultimate Administrative Body with responsibility for all of these matters is the Company's Board of Directors (the "**Board"**), with the support of various governance and control functions that it has put in place to monitor and manage the business.

The Company's financial year reporting date changed from 30 September to 31 December during the period. Hence the 2019 financial year covers a 15-month period. The Company reports its results in GBP (Pounds Sterling).

Overview of the Company

Until recently, White Horse Insurance Ireland dac was a wholly owned subsidiary of Thomas Cook Group plc, a UK based Travel company. However, on 23 September 2019, Thomas Cook Group UK Companies were placed into compulsory liquidation. Since this event, White Horse has been in close and continuous contact with the Central Bank and continues to underwrite a substantial book of mainly travel related insurance business across the EU. The Company continues to operate as a going concern and the Central Bank recently authorised the sale of the Company to CSPIM Limited. The updated Company Structure is outlined in section A.1.

Underwriting and Investment Performance

- The Company's core product offering is travel insurance which it distributes through partners and affiliates of its new parent and through other third party distributors. Travel Insurance and Reinsurance accounted for over 95% of premia underwritten in the financial year.
- Business written into the United Kingdom continues to remain the largest source of revenue accounting for 39% of GWP with Spain accounting for 34%.
- Business written within the Home Country (Republic of Ireland) accounts for 8% of GWP.
- Premium written into Sweden made up 10% of GWP. However new GWP ceased during the year following the collapse of Thomas Cook. The Company continues to write business in Norway and Finland.
- The Company reinsured business via a German insurer during the year and this accounted for nearly 10% of GWP. Investment performance activity was minimal and profit from investments over the period amounted to £0.11m. All of the Company's investment assets were placed on rolling short term deposits over the full course of the year with achieved interest rates typically low.

Significant Events

- A key significant event was the compulsory liquidation of Thomas Cook Group, White Horse's parent entity.
- At the time of writing, a second significant event is unfolding with the emergence of the widespread impact of the Coronavirus.

System of Governance

The Company's approach to its System of Governance continues to consider the nature, scale and complexity of the organisation, albeit adapted to the new structure. Appropriate governance forums operate to ensure that there is clarity and transparency of decision-making at all levels. Terms of Reference for all key committees are documented and reviewed on an annual basis, with all key policies reviewed and approved through the White Horse Board or Risk Committee. Full detail of the Company's System of Governance is covered in the report.

Key Risks

Following the collapse of its parent, the business is focussed on stabilisation and control in the short to medium term. In December, the business submitted its updated ORSA to the Central Bank. The report outlines how the company can withstand the impacts of its parent's insolvency, with stress testing and scenario analysis being performed on the revised 'post Thomas Cook' business plan.

The business is examining risk exposures related to the Covid19 pandemic and this is currently a key risk. At the time of writing the full extent of the impact of the virus is not known and it remains to be seen what the extent of the effects will be on claims and on sales of travel insurance.

Another key risk to the business is the UK's withdrawal from the European Union. The Company has taken steps to mitigate the impact of this and is registered with the PRA to enter into the Temporary Permissions Regime at the end of 2020. Cyber Security and Data Protection risk remains high on the agenda, and post migration of systems from Thomas Cook, a key focus has been to ensure IT security controls are sufficiently robust. The results from the ORSA continue to influence decision-making and the terms of new business engagement.

Solvency Capital Requirement ("SCR")

- The Company's Ratio of Own Funds to SCR was 152% as at 31st December 2019.
- There are no volatility or matching adjustments applicable for the Company.
- There are no transitional arrangements in use by the Company.
- The Company's entire Own Funds comprises Tier 1 capital only.

The Company's Own Funds have remained in excess of the Solvency Capital Requirement and the Minimum Capital Requirement ("MCR") throughout the year.

White Horse Insurance Ireland dac

A. BUSINESS AND PERFORMANCE

A.1 Business

White Horse is a private company limited by shares. The Company's operating address and registered office is:

White Horse Insurance Ireland dac,
Rineanna House
ShannonFreeZone
Shannon
Co. Clare

The Central Bank of Ireland ("**CBI**") is the regulatory authority responsible for financial supervision of the Company. The CBI's address is:

Central Bank of Ireland,
New Wapping Street
North Wall Quay,
Dublin 1,
Ireland

The Company's external auditor for the Financial year end 2019 was Ernst & Young Chartered Accountants, Harcourt Centre. Harcourt Street, Dublin 2, Ireland.

The Company's is wholly owned by CSPIM Limited, a newly formed Irish holding company which is 50% owned by CSP Holding Ltd (UK) and 50% owned by Intermundial XXI, S.L (Spain). The Company's only subsidiary, White Horse Administration Services Limited continues to operate, carrying out insurance mediation activities including claims handling and sales of travel insurance to UK & Ireland customers.

White Horse focusses on travel insurance as its core product offering. The Company operates on a 'Freedom of Services' basis across Europe with its core business offerings in the UK, Ireland and Spain. Alongside travel insurance, the Company also underwrites Gadget insurance and a small book of Wedding insurance. The Company contracts with claims and medical assistance service providers to service its customers.

Policy administration and non-assistance claims handling services for travel insurance customers is outsourced to White Horse Administration Services Limited ("**WHASL**") which is itself a subsidiary of the Company. Emergency medical assistance for UK and Ireland business is outsourced to Cega Group Services Limited ("**CEGA**") which is a UK based specialist emergency medical assistance services provider. Servisegur Consultores XXI SL ("**Servisegur**") carries out claims servicing for non-English language schemes. For Gadget insurance, the company has engaged Direct Validation Services ("**DVS**") to handle claims on its behalf.

Going Concern

The directors have considered the Company as a going concern against key potential exposures related to the Covid-19 pandemic, including undertaking a rigorous assessment of the forecast outcomes, downside risks and mitigating actions. The assessment includes consideration of a number of severe but plausible scenarios such as ongoing travel restrictions, increased severity of claims, reinsurance recovery and other operational risks. The directors have assessed and modelled the impact of these uncertainties and have prepared possible mitigations should the uncertainties materialise within the foreseeable future.

The directors believe that sufficient mitigating actions have been identified to address all reasonable foreseeable adverse scenarios.

The directors have a reasonable expectation that the company has adequate resources to continue in operational existence for a period of no less than 12 months from the date of this report. Thus, they are satisfied to continue to adopt the going concern of accounting basis in preparing the financial statements.

A.2 Underwriting Performance

Underwriting performance is monitored on an on-going basis and pricing is reviewed at least annually for each individual scheme. Exposure is capped by specific limits within the insurance policy and by utilising excess of loss reinsurance contracts. The 2019 results are for a fifteen-month period compared to twelve-month in 2018 and have obviously been affected by the collapse of Thomas Cook Group.

	GBP £'m 2019	GBP £'m 2018
Gross Written Premium	37.7	22.1
Net Earned Premium	37.0	22.5
Claims Paid and movement in provision net of reinsurance	-27.1	-15.7
Other Operating Expenses	-9.2	-4.5
Underwriting performance	**0.6**	**2.3**

Key Assumptions used in Calculating Insurance Liabilities

When estimating the cost of claims outstanding at the year-end, the principal assumptions underlying the estimates are derived from the Company's historic development patterns and expected loss ratios. This includes assumptions in respect of historic claims costs, average claims handling expenses, claim development patterns and market developments. The key sensitivity relates to that of the technical reserves and this is illustrated in the table below.

Movement in Technical Reserves (IFRS net of reinsurance)

	Unearned Premium Provision GBP £'m	Claims Provisions GBP £'m	Refunds Provision GBP £'m	Total GBP £'m
Opening Balance	4.6	5.0	0.0	9.6
Movement in period	0.2	2.2	1.8	4.2
Closing Balance	**4.8**	**7.2**	**1.8**	**13.7**

Technical Reserves Sensitivity Analysis

	Claims reserves movement GBP £'m	Impact on profit before tax GBP £'m	Shareholder's equity movements GBP £'m
Estimates by +/- 10%			
Change in Claims Reserves	0.7	0.7	0.7

Incurred Claims Development

Calculations of Incurred but Not Reported ("IBNR") reserves are based upon historic development patterns and expected loss ratios. The Company transacts short tail business, for which uncertainty about the amount and timing of claims payments is typically resolved within one year.

A.3 Investment Performance

Investment Income

White Horse's overall strategic approach is to increase business volume (i.e. Gross Written Premium) through providing insurance services that deliver value to customers and profit to the Company. White Horse seeks to achieve this through predominantly risk averse and conservative investment activities. The White Horse Board has a low appetite for losses arising from investment activities and the Company commits to maintaining a sufficient level of liquidity to meet all of its liabilities as they fall due.

	GBP £'m 2019	GBP £'m 2018
Interest received and receivable	0.11	0.04

A.4 Performance of Other Activities

Section Not Applicable

A.5 Any Other Information

There is no material other information to note.

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B. SYSTEM OF GOVERNANCE

B.1 General Information on the System of Governance

The Company is classed as a Low Risk firm under the CBI's risk-based framework for the supervision of regulated firms, known as PRISM or Probability Risk and Impact SysteM. The Company is subject to the CBI's Corporate Governance Requirements for Insurance Undertakings 2015.

The Board of Directors

The principal purpose of the Board of Directors of the Company (the "**Board**") is oversight of the long-term success of the Company whilst ensuring financial stability and solvency. This includes the protection and enhancement of the value of its assets. The Board will act in the best interests of the Company taking into account its stakeholders including the shareholder, employees, regulatory bodies, customers and the public.

The Board oversees the conduct of the business and its senior management and will have a full understanding of the nature of the Company's business activities, related risks and its financial statements.

Board Objectives

- To provide effective, prudent and ethical oversight of the Company;
- To set and oversee an effective business strategy. The Board brings objectivity and judgment to the strategic planning process and ultimately approves, on an annual basis, the strategic plan which takes into account, among other things, the opportunities and risks of the Company's business;
- To ensure risk is properly monitored and managed. This includes establishment and oversight of the risk appetite, risk management framework and internal controls framework.
- To oversee the investment and distribution of regulatory capital whilst ensuring adequate cover against the company's regulatory solvency capital requirement and internal assessment of own risks;
- To ensure compliance is properly monitored and managed. The Board will oversee the internal controls framework, including internal audits, financial reporting and accounting systems and management systems to effectively monitor the Company's business and operations and ensure compliance with applicable laws, regulations and policies;
- To establish and oversee a robust and compliant approach to corporate governance;
- To appoint a Chief Executive Officer and senior management with appropriate integrity and adequate knowledge, experience, skill and competence for their roles. The Board will also endorse the appointment of people who may have a material impact on the

risk profile of the institution and monitor on an on-going basis their appropriateness for the role;

- To ensure an appropriate succession plan is in place;
- To implement remuneration policies and procedures based on best practice and compliant with any requirements issued by Central Bank of Ireland;
- To monitor compliance with the Company's Code of Conduct on business conduct and ethical behaviour;
- To ensure a robust and transparent organisation structure and reporting channels.

Current Board Membership

Membership of the Board changed over the last reporting period. Changes were necessitated with the change in ownership of the company and also the sudden passing of an Independent Non-Executive Director in January of this year. Current board members are:

Mr. Peter Hughes (Chairman and Independent Non-Executive Director)

Mr. Brian House (Chief Executive Officer)

Ms. Veronica Ryan (Chief Financial Officer and Company Secretary)

Mr. David Stirling (Group Non-Executive Director)

The company is in the process of seeking approval for an additional Group director from its new parent entity CSPIM Limited and is also recruiting an Independent Non-Executive director.

The Board currently delegates authority to the Risk Committee and Audit Committee to oversee the conduct of the appropriate functions relating to these committees. Whilst membership of both committees previously comprised the full Board, it is anticipated that the membership structures of these committees will change once new members are approved, this will be done in compliance with the Corporate Governance Requirements for Insurance Undertakings.

Audit Committee Objectives

- Monitoring the effectiveness and adequacy of the Company's internal control, internal audit and IT systems;
- Liaising with the external auditor particularly in relation to their audit findings;
- Reviewing the integrity of the Company's financial statements and ensuring that they give a "true and fair view" of the financial status of the Company;

- Reviewing any financial announcements and reports and recommending to the Board whether to approve the Company's annual accounts (including, if relevant, Group accounts); and

- Assessing auditor independence and the effectiveness of the audit process.

Risk Committee Objectives

- To advise the Board on risk appetite and tolerance for future strategy, taking account of the Board's overall risk appetite, the current financial position of the Company and, drawing on the work of the Audit Committee and the external auditor, the capacity of the Company to manage and control risks within the agreed strategy;

- To oversee the risk management function;

- To ensure the development and on-going maintenance of an effective risk management system within the Company that is effective and proportionate to the nature, scale and complexity of the risks inherent in the business;

- To advise the Board on the effectiveness of strategies and policies with respect to maintaining, on an on-going basis, amounts, types and distribution of both internal regulatory capital requirements and own funds adequate to cover the risks of the institution.

Key Functions

Chief Executive Officer

The Chief Executive Officer ('**CEO'**) reports directly to the Chairman of the Board and is responsible for all executive management matters affecting the Company and for the delivery of the short, medium and long term strategic objectives of the Company.

Chief Financial Officer

The Chief Financial Officer ('**CFO'**) is a member of the Board and reports directly to the CEO with primary responsibility for the management of the financial risks of the Company. The CFO advises and manages strategic and tactical matters in relation to accounting, financial planning, reporting and record-keeping.

Head of Actuarial Function

The role of the Head of Actuarial Function ('**HoAF'**) is outsourced to Lane Clark & Peacock Ireland Limited. The HoAF is responsible for the Actuarial Function and for the tasks allocated to it. The responsibilities of the HoAF and the Actuarial Function, in line with guidance from the Central Bank of Ireland and the Society of Actuaries, include, but are not limited to the following matters:

- Co-ordinating the calculation of the firm's Technical Provisions;
- Assessing the consistency of the internal and external data used in the calculation of Technical Provisions against the data quality standards as set in Solvency II;
- Continuous monitoring of the solvency position of the Company and the required level of statutory reserves;
- Reporting on the solvency position of the Company;
- The provision of advice and support to the Company on the ORSA (Own Risk and Solvency Assessment) process, including the financial consequences of stresses and scenarios and the impact of management actions.
- Providing opinions on the Company's underwriting activities and reinsurance arrangements.

Head of Internal Audit

The Head of Internal Audit ('**HoIA'**) is currently a function outsourced to KPMG Ireland and is independent from the operational functions of the Company. The HoIA does not have any responsibility for any other function when evaluating and reporting the audit results. The HoIA has direct access to the Independent Non-Executive Directors of the Board.

Chief Risk & Compliance Officer

In accordance with the nature, scale and complexity of the Company and its products, the Company has combined the roles of Chief Risk Officer and Compliance Officer ('**CRCO**'). The CRCO is responsible for the oversight of the Risk Management Framework and for implementing the systems, policies and procedures within White Horse to comply with applicable laws and regulations. The Board also delegates responsibility to the CRCO for monitoring the solvency coverage ratio of the Company for which it (the Board) remains ultimately accountable.

Remuneration

The Company provides a range of benefits to employees, including contractual salary, pension, life cover, travel concessions and travel and car hire excess insurance.

Material Transactions

Other than payment for services for those outsourced functions set out in section B7 of this report, and contracted employee salaries and benefits mentioned above, there were no other material transactions with persons who exercise a significant influence on the undertaking including any Board members.

B.2 Fit and Proper Requirements

The Central Bank Reform Act 2010 provides that a person performing a control function ('**CF**') must have a level of fitness and probity appropriate to the performance of that particular function. The Company has adopted a Fitness and Probity Policy which is aligned with the 2010 act and with the Central Bank of Ireland's Guidance on Fitness and Probity Standards 2014.

The Company addresses the fitness of each CF appointment on a case by case basis, and considers in its assessment the person's professional and formal qualifications, knowledge and relevant experience within the insurance sector, other financial sectors or other businesses and takes into account the respective duties allocated to that person and, where relevant, the specific technical skills of the person.

The Board will consider during its assessment of a Pre-approved Control Function ('**PCF'**) the respective duties allocated to individual members to ensure appropriate diversity of qualifications, knowledge and relevant experience to ensure that the undertaking is managed and overseen in a professional manner.

The process of assessment for a candidate for a Control Function role includes the following:

- A written job description outlining the duties and responsibilities of the role;
- An assessment of the level of fitness and probity required for the role, on the basis of the formally documented job description and role specification;
- A process that matches the person with the requirements of the role;
- Verification of identity, relevant qualifications, experience, references and professional memberships where required;
- Approval by the Board and Central Bank of Ireland where required.

Approval from the CBI is required prior to the appointment of PCF role holders by the Company's Board. PCF role holders of the Company include all members of the Board as well as the Head of Actuarial Function, Chief Risk & Compliance Officer, Head of Claims and Head of Internal Audit.

B.3 Risk Management System

Strategy and Risk Appetite

The Company's Risk Appetite Statement defines the qualitative and quantitative risk appetite statements for each material risk type facing the business, and these are aligned to the business objectives. Operating limits are set by product line, counterparty and third party provider with trigger levels defined for each. Regular management team meetings and committees take place that monitor limits and take remedial action as required.

Accountable owners in the business are responsible for notifying the CRCO immediately of breaches to these statements. The CRCO will then notify the Board of any breaches and escalate accordingly.

The Central Bank of Ireland will be notified in writing of material deviations from the defined risk appetite (those with a 'Red' RAG status), along with the appropriate action to remedy the deviation, within 5 business days of the Board becoming aware of the deviation.

Identification, Monitoring and Management of Risk

The Company has identified and defined a common taxonomy of all key material risks to which the Company is exposed. These material risks are documented in the Company's Risk Register and form a central part of the Company's risk monitoring and reporting activities.

The Company manages each material risk category with monthly reporting on the Risk Register against the Risk Appetite Statement. Risks are also directly linked to key controls and these are documented and reviewed on an on-going basis by assigned risk and control owners. A formal review of the Risk Register is carried out on a quarterly basis.

The business units (e.g. underwriting, reinsurance, claims, and finance) are responsible for identifying and assessing risks and related controls in the first instance. Management assesses risk in the following ways, including but not limited to:

- Reviews of the Risk Register;
- Regular Control Testing and remediation activity where required;
- Reviews of Operational Risk Events;
- Business Performance & Risk Exposure Reporting;
- Monthly Management meetings;
- Annual ORSA process;
- Formal Board & Committee Meetings.

Risk is assessed and measured on both a qualitative and quantitative basis. The frequency of the assessment and measurement process is consistent with the volatility of the risk and controls. Risk exposures are evaluated and quantified through the Company's risk appetite framework and stress and scenario testing activities.

In the first instance, all employees of White Horse are responsible for monitoring, reporting, and where required, escalating the reporting of risks.

Business performance, risk exposures and large loss notifications are monitored and reported on a regular basis.

The CRCO assesses the adequacy of limits and provides input into the monitoring process performed by the management team. The CRCO monitors risk levels independently from the management team and reports to the Board Risk Committee on a quarterly basis, or more often as required. The report provides an indication of performance against agreed risk appetite limits and any new or emerging risk trends.

ORSA Risk Management

Capital levels and Technical Provisions are monitored on an on-going basis with regular reporting to the management team, Management Risk Committee, Board Risk Committee and to the Board. The Solvency Capital Requirement is assessed on a quarterly basis. Material deviations from planned capital or solvency coverage levels are notified to the management team, Risk Committee and Board. Any breach of the Company's risk appetite tolerances in respect of capital adequacy will be reported immediately to the Board and Central Bank of Ireland.

Intrinsically linked to the Business Strategy, the Own Risk and Solvency Assessment ('**ORSA**') is a central component of the Company's Risk Management Framework and the key internal process undertaken by the Company to determine the Own Funds necessary to ensure that the Company's overall solvency needs are met at all times. The ORSA addresses all key risks both internal and external that are applicable to the Company and considers the business strategy and required capital over a medium to long term period.

The Board has adopted the Standard Formula as the method for calculating the required regulatory capital needs of the Company. The ORSA also addresses the capital needs of the Company on an "own risk" assessment.

Key milestones of the ORSA process include:

- Review of Risk Management policies and plans;
- Business Planning (consideration of mid to long term plan and strategy);
- Results from quantitative analysis and review of base assumptions;
- Regular review of Risk Register and risk appetite outputs and metrics;
- Review, testing and assessment by the Actuarial Function;
- Review, assessment and reporting from the Risk Function, including review of Business Strategy risks, operational risk events, analysis of Realistic Disaster Scenarios and other Root Cause Analysis;
- Challenge and discussion from Board on Stress and Scenario Tests ("SSTs");
- Review and challenge / feedback from the Risk Committee or Board;
- Issue final ORSA for internal approvals and submit to CBI; and
- Strategic ongoing business decisions made as a result of the management actions and other outputs of the ORSA process.

Review and Approval of the ORSA

The Board will review, approve and sign off the ORSA at least annually. Additional ad-hoc ORSAs may be carried out and reviewed by the Board under certain circumstances. Examples of circumstances which may give rise to this requirement are outlined below:

- Substantial change or drop of the capital base or solvency capital requirement;
- Substantial change in risk profile;
- Significant market-wide event.

Where the risk profile of the Company may be perceived to have deviated from assumptions underlying the SCR calculation, the Company may decide to perform a qualitative analysis to assess the materiality of the deviation and then decide whether a further quantitative assessment is required.

The Company completed its annual ORSA process with a report due to be approved at the September 2019 Board meeting. However, the collapse of the Company's parent, signified a significant change in the Company's risk profile. Risk exposures were reassessed and funds and financial projections were recalculated. A new ORSA report was approved at the December Board meeting.

The Company uses a modified and recalibrated version of the Standard Formula for the own assessment of capital, incorporating the Company's own actuarial assumptions. A three-year base case projection of the Balance Sheet and own assessment of capital requirements position is produced using this model, as well as business performance assumptions for future years.

A number of Stress and Scenario Tests are selected by the Board in order to understand how sensitive the Company's financial and solvency position is to certain events or under different strategic planning assumptions. The outputs are reviewed by management and challenged by the Board and, where appropriate, potential management actions are noted and followed through to completion.

The Company is satisfied that its current strategy is supported by sufficient capital into the future. Allowing for a planned capital management policy to be executed, the Company is satisfied that there is adequate capital in place.

The Company continues to actively monitor its capital sufficiency and risk exposures in light of the Covid-19 outbreak which was in its infancy at the time this document was published.

B.4 Internal Control System

The Company has established and maintains a system of governance which provides for the sound and prudent management of the business and includes:

- A transparent organisational structure with clear allocation and appropriate segregation of responsibilities;
- An effective system for the review of Management Information and transparent decision-making; and
- Compliance with the system of governance requirements set out in regulations 44 to 51 of the European Communities (Insurance and Reinsurance) Regulations 2015.

The Compliance function, led by the Chief Risk & Compliance Officer, reports administratively and functionally to the Board.

The CEO and each business manager is expected to take operational responsibility for compliance within their areas of responsibility. Each business manager shall support the Chief Risk & Compliance Officer in carrying out her role and in particular shall be responsible for:

- Implementing the systems, policies and procedures within White Horse to comply with applicable laws and regulations relating to a regulated insurance undertaking;
- Managing their departments and staff in a manner which is compliant with applicable laws and regulations relating to a regulated insurance undertaking;
- Monitoring the activities of their departments and staff to ensure that the work of their departments and staff is compliant with applicable laws and regulations relating to a regulated insurance undertaking;
- In relation to management employed by White Horse, overseeing outsourcing arrangements to ensure outsourced providers have adequate systems, policies and procedures to comply with applicable laws and regulations, and all relevant rules, policies and procedures as requested by White Horse;
- Ensuring that the CRCO is promptly informed of proposals for new or revised products, procedures and systems in a timely manner to ensure compliance issues are given appropriate consideration;
- Ensuring that the CRCO is promptly informed of any compliance incidents and that appropriate action is taken if a compliance incident occurs; and
- Ensuring that the CRCO is promptly informed of any facts relevant for the performance of their duties.

The CRCO, through the authority derived from the Board, is responsible for the management of the Compliance Function. The principal compliance responsibilities of the CRCO are:

- Monitoring the implementation of compliance and reporting periodically to the CEO and to the Board;
- Reviewing products, procedures and systems on a planned basis from the viewpoint of effective compliance and taking the necessary steps to ensure compliance;
- Reviewing staff training processes to ensure appropriate compliance competencies;
- Advising the Board on compliance with applicable regulatory requirements;
- Performing an assessment of the possible impact of any changes in the legal environment on the operations of the Company and the identification and assessment of compliance risk;

- Establishing a Compliance Policy and a Compliance Monitoring Plan. The Compliance Policy shall define the responsibilities, competencies and reporting duties of the compliance function. The Compliance Plan shall set out the planned activities of the compliance function which take into account all relevant areas of the activities of the Company and its exposure to compliance risk; and

- Assessing the adequacy of the measures adopted by the Company to prevent non-compliance.

B.5 Internal Audit Function

The HoIA monitors the Company's internal controls, providing independent and impartial assessment of the adequacy of and compliance with regulatory and legal requirements and with the policies and procedures of the Company, including providing assurance that the risk management function is functioning as designed. The Internal Audit Function is objective and independent from the operational functions and does not have any responsibility for any other function when evaluating and reporting the audit results. The HoIA has direct access to the Independent Non-Executive Directors of the Board.

The Internal Audit Function is responsible for the following:

- Establishing, implementing and maintaining an audit plan setting out the audit work to be undertaken in the upcoming years, taking into account all activities and the complete system of governance of the Company;
- Taking a risk-based approach in deciding its priorities;
- Reporting the audit plan to the Board on an annual basis;
- Issuing an internal audit report to the Board based on the results of work carried out, which includes findings and recommendations to the Board including the envisaged period of time to remedy the shortcomings and the persons responsible for doing so, and information on the achievement of audit recommendations;
- Submitting the internal audit report to the Board on at least an annual basis; and
- Verifying compliance with the decisions taken by the Board on the basis of those recommendations made in the internal audit report.

B.6 Actuarial Function

The Company's Actuarial Function is structured as follows:

- The role of the Head of Actuarial Function ('**HoAF'**) is outsourced to Lane Clark & Peacock Ireland Limited ("LCP");
- The HoAF is supported in his role as HoAF by the Company's in-house Actuarial Team, and also by his colleagues at LCP.

Key responsibilities of the Actuarial Function include:

- Co-ordination of the calculation of Technical Provisions including reviewing the appropriateness of the methodology and assumptions used, assessing and communicating the key sources of uncertainty in the figures and justifying the differences between successive periods. The work on Technical Provisions culminates in the Actuarial Report on Technical Provisions and the Actuarial Opinion on Technical Provisions.
  - The Actuarial Function must produce the following annual reports for the Board: Actuarial Report on Technical Provisions, Actuarial Opinion on Technical Provisions and Actuarial Function Report. The reports should cover all of the information necessary for the Board to form its own opinion on the adequacy of Technical Provisions, the ORSA and on the underwriting and reinsurance arrangements.
  - Contribution to the effective implementation of the risk management system of the Company, in particular:
    - In relation to the Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR), the Actuarial Function reviews the output of the model used by the Company to calculate the SCR and MCR. Specifically, any perceived or possible inconsistencies or issues identified in the model results are raised; and
    - ORSA - the Chief Risk and Compliance Officer, HoAF and Actuarial Manager together establish the requirements of the audience for the ORSA report, agree how the requirements will be satisfied and agree the format of the draft ORSA reports, the supporting appendices and working papers.

B.7 Outsourcing

The Company has formally documented its outsourcing policy and undertakes a risk assessment and due diligence process prior to any final decision being made as to whether to outsource a material business activity. This addresses all material factors that would impact on the potential service provider's ability to perform the business activity. Each established outsourcing arrangement is also subject to on-going monitoring and formal annual review.

Currently the Company outsources the following key functions:

- Non-Assistance claims administration is outsourced to the Company's Irish subsidiary company and to other third party providers in the EU and the UK;
- Assistance claims administration is outsourced to a UK company and also to a Spanish claims provider which is an affiliate of the Company's parent;
- IT Services are outsourced to a local IT Services company with certain applications managed by a third party UK IT Services provider;
- The Company's Head of Actuarial Function is outsourced to a specialist Irish Actuarial service provider;

- The Head of Internal Audit of the Company is outsourced to an external third party provider;
- Fraud Management services are outsourced to a specialist UK third party provider;

B.8 Any other information

Section Not Applicable

C. RISK PROFILE

The definitions and tolerances around the acceptance of risk are documented through the White Horse Risk Appetite statement for each material risk type.

The Company's overall strategic approach is to increase business volume (i.e. Gross Written Premium) through providing insurance services that provide value to customers and profit to the Company. White Horse seeks to achieve this through a defined underwriting strategy and conservative investment activities.

White Horse's risk management objectives seek to:

- Ensure that the risk appetite is reflective of the Company's overall business strategy;
- Protect White Horse's commercial interests ensuring profitable returns for its shareholder;
- Protect the legitimate interests of its customers;
- Protect the legitimate interests of its shareholders; and
- Comply with all legal and regulatory requirements.

Risk Mitigation
White Horse manages each material risk category with monthly reporting on the risk register against the risk appetite statement key risk indicators and quarterly review of all risks and controls.

- Insurance Risk: White Horse underwrites business that limits volatility and adopts a controlled approach to underwriting, pricing and reserving and implements a reinsurance programme to minimise aggregation of risk and individual large losses.
- Market Risk: White Horse assumes a low level of market risk arising from very short term deposits. The Company monitors currency risk which is partially naturally hedged by non-GBP claims and operating costs offsetting non-GBP premium revenue.
- Counterparty Risk: White Horse monitors its debtors on a monthly basis.
- Liquidity Risk: White Horse seeks to ensure that a suitable level of liquid assets is held to cover all future liabilities as they fall due.

- Operational Risk: White Horse carries out regular reviews of its Risk Register and carries out regular testing to monitor the effectiveness of controls in place to mitigate operational risk.
- Group Risk: White Horse recognises the need to monitor the risks and exposures of its parent and its parent's affiliates to assess potential exposures for the Company.
- Business Model / Strategy Risk: White Horse provides oversight of the strategy implementation on an ongoing basis.

Risk Concentration

The Company is not exposed to any non-standard material risk concentrations. The Company recognises at this time that the current Covid-19 pandemic carries potential material risk exposures, the extent of which is currently still being assessed.

Risk Sensitivity

The risks most material to the Company's own assessment of its capital requirement are Underwriting Premium & Reserve Risk and Operational Risk. The methodologies underpinning these assessments are as follows:

- Underwriting Premium Risk – a probability distribution model of the ultimate loss ratio, parameterised by considering the historical volatility in the Company's loss ratio.
- Reserve Risk – a probability distribution model of the ultimate cost of incurred claims (including IBN(E)R), parameterised by considering the historical volatility of the Company's loss development.
- Operational Risk – a deterministic model derived from the Company's Risk Register.

A range of Stress and Scenario Tests are selected by the Board and applied to the Company's business plan leading to a range of projected Balance Sheets and capital requirements.

These provide an understanding of how sensitive the Company's financial and solvency position is to certain events or under different strategic planning assumptions. The outputs are reviewed by management and challenged by the Board and, where appropriate, potential management actions are noted and conclusions drawn. The Company is satisfied that its current strategy is supported by sufficient capital into the future.

The Stress and Scenario Tests chosen the Board generally fall into the following categories:

- Premium Volumes – testing the effects of achieving business volumes that are significantly higher or lower than budgeted for.
- Loss Ratios – testing the effects of claims levels that are significantly higher or lower than expected.
- Expenses – testing the effect of continual adverse expense inflation.
- Group Stresses – testing the extent to which Group Company dependencies could be detrimental to the solvency ratio.
- Brexit – testing the impacts of currency fluctuations and lack of ability to distribute business into the UK.

Generally, the Company is currently sufficiently capitalised to withstand a large range of onerous stress and scenarios. The tests revealed that the greatest threat was the particular combination of significantly increased business volumes coupled with adverse claims experience.

The company's main management actions and mitigations available in response to such adverse conditions are:

- Constant review of underwriting performance taking corrective action such as rate reviews where needed.
- Restriction of business volumes in the event that premium amounts grow too quickly.
- Reinsurance and other forms of risk share and risk transfer.
- Restriction of dividends and/or capital injections from the Company's parent company.

C.1 Underwriting risk

The White Horse Board's objective is to maintain consistent profitability for its shareholder whilst increasing premium levels (i.e. business volume) and providing products which perform as customers expect them to perform. The White Horse Board applies the following underwriting philosophy to achieve this objective:

- Write insurance business that limits volatility in earnings and profit, whilst maintaining required capital levels;
- Adopt an approach to underwriting, pricing and reserving that drives business volumes in a controlled way whilst growing underwriting profit; and
- Maintain a low appetite for catastrophic claims losses via comprehensive reinsurance programme.

C.2 Market risk

White Horse operates a conservative investment strategy.

The Company assumes a low level of interest rate risk arising from very short term deposits. The Company monitors currency risk and hedging strategies are used to reduce the impact on White Horse of potential foreign currency exchange rate fluctuations.

The Board has a low appetite for losses arising from investment activities.

C.3 Credit risk

White Horse is exposed to credit risk by placing insurance business through reinsurers, broking distribution channels, providing liquidity to outsourced claim handlers and via short term deposits with financial institutions.

The White Horse Board has a low appetite for financial losses arising from the failure of these counterparties or arrangements. White Horse applies strict vetting criteria, including assessment of counterparty financial position, credit rating and reputation.

C.4 Liquidity risk

White Horse aims to maintain a sufficient level of liquidity to meet all of its liabilities as they fall due. The Company manages its liquidity risk in the following ways:

- All excess assets are held on short term deposits;
- Cashflow forecasting is prepared annually and reported against weekly.

C.5 Operational risk

The White Horse Board has minimal appetite for financial losses arising from failings or errors in relation to people, internal or external processes and systems, particularly when such losses could translate into:

- A negative impact on White Horse's reputation;
- An inability to continue to provide insurance services to our customers or any risk of material customer detriment;
- A breach of applicable laws and regulations; or
- An inadequate calculation of our capital levels.

In addition, White Horse has minimal appetite for losses resulting from internal and external fraud.

The White Horse Board seeks therefore to limit and mitigate Operational Risk exposures through a strong control environment supported by White Horse's core values and risk culture. Root Cause Analysis of complaints and risk events is carried out on a regular basis. Legal and regulatory compliance is monitored continuously and reported to the White Horse Management team and to the Management Risk Committee. Operational losses are closely monitored and risk appetite thresholds are set to effectively monitor, report and where necessary escalate incidences of operational loss.

Group Risk
Group risk is defined as the risk of loss arising from being part of a wider parent company. The Company recognises that a significant portion of its business is providing insurance products through certain key distributors affiliated with its new parent.

Business Model / Strategy Risk

Strategic risk is defined as the risk of loss resulting from the inadequate definition and setting of the Company's strategy. Reputational risk is defined as the risk of loss resulting from damage to the Company's reputation or brand resulting in loss of revenue and/or damage to shareholder value. The Company monitors both of these risks through its regular risk management reporting.

Conduct Risk: Product Oversight and Governance

Conduct risk is linked to strategy and organisational culture and is defined as risk to the delivery of fair outcomes for White Horse's customers. The Company ensures that the business complies with general regulatory principles of fairness and transparency along with more prescriptive legal and regulatory requirements.

C.6 Other Material Risks

Section Not Applicable

C.7 Any Other Information

The Company is actively monitoring the effects of the UK's impending departure from the European Union. It has planned for various outcomes and recognises that in the extreme and unlikely event that the Company is no longer able to conduct sales of insurance into the UK, this would have a material effect on the risk profile of the Company. The Company is registered with the PRA and FCA to enter the Temporary Permissions Regime on 1 January 2021.

D. VALUATION FOR SOLVENCY PURPOSES

D.1 Assets

The Company's assets can be summarised as follows as at 31 December 2019:

	Financial Statements GBP £'m	Adjustment GBP £'m	Solvency II GBP £'m
Cash and cash equivalents	20.0		20.0
Insurance and intermediaries receivables	5.9	-3.6	2.3
Reinsurance Recoverables & Receivables	0.0	-0.3	-0.3
Investment in Subsidiary	0.5		0.5
Receivables (non-insurance)	0.7		0.7
Property & Equipment	0.1		0.1
Other Assets	0.1		0.1
Total	**27.3**	**-3.9**	**23.4**

The Statement of Financial Position, prepared in accordance with IFRS and IFRIC interpretations endorsed by the European Union and with those parts of the Companies Act 2014 applicable to companies reporting under IFRS, forms the basis of the Solvency II balance sheet. Balances are adjusted to Solvency II valuations in accordance with the guidance issued by EIOPA and the CBI and using the valuation principles set out in the Directive 2009/138/EC, Delegated Regulation (EU) 2015/35, Solvency II Technical Standards and Guidelines.

The Company held Cash and Cash Equivalents to the value of £20m at the reporting date with Solvency II valuation consistent with IFRS measurement principles. Cash and Cash Equivalents are measured at nominal amount, without any adjustment for the probability of default of the counterparty. The nominal value is considered a good estimation of the fair value within the materiality and proportionality principles.

The value of insurance and Intermediaries Receivables was £2.3m as at the reporting date. Under Solvency II, it includes the Company's policyholder and intermediary debtors adjusted to remove premium receivable but not yet due. This is consistent with the valuation principles for technical provisions under Solvency II which require that such balances are deducted from technical provisions. Insurance and Intermediaries Receivables are measured at nominal amount, without any adjustment for the probability of default of the counterparty. The nominal value is considered a good estimation of the fair value within the materiality and proportionality principles.

The combined value of reinsurance recoverables and reinsurance receivables in the Solvency II balance sheet was £-0.3m as at the reporting date. The valuation principles and methodologies used to calculate the reinsurance recoverable are consistent with those concerning Solvency II technical provisions. Reinsurance receivables are measured at nominal value without adjustment for the probability of counterparty default. The nominal value is considered a good estimation of the fair value within the materiality and proportionality principles. The valuation of such receivables is practically the same under both IFRS and Solvency valuations.

Reinsurance Recoverables include all expected future cashflows on a best estimate valuation basis. Best estimate assumptions for future reinsurance claim and reinsurance premium cashflows have been derived from historic experience with adjustments for expert judgements taking into account changes in the demographic and economic environment.

The £0.3m adjustment on transition from an IFRS to Solvency II basis reflects the fact all contractually bound future reinsurance payments must be accrued for on a Solvency II basis irrespective of whether the amount has yet fallen due. This is consistent with SII Technical Provision calculation principles.

All other assets on the Solvency II Balance Sheet are aligned in value reported in the Company's Financial Statements.

D.2 Technical provisions

The Company's material lines of business are Medical Expense Insurance and Assistance, while the company has a new gadget book which while very short tailed adds c0.1m to the total technical provisions. The Solvency II technical provisions for the Company are equal to the sum of a best estimate and an explicit risk margin. Below is a breakdown of the Technical Provisions:

	GBP £'m	GBP £'m	GBP £'m
	Medical Expense Insurance	**Assistance**	**Gadget Insurance**
Best Estimate	2.8	6.2	0.1
Risk Margin	0.2	0.3	0.0
Total	**2.9**	**6.5**	**0.1**

The starting point in the calculation of the Solvency II Technical Provisions is the calculation of provisions as set out in the Company's Financial Statements.

The Financial Statements of the Company include reserves for claims outstanding based on earned premiums which consider all reasonably foreseeable best estimates. This includes reserves for claims incurred plus a provision for claims incurred but not yet reported (IBNR). The Company also considers any amounts recoverable from reinsurance contracts in respect of its claims reserves and IBNR. The booked reserves also include a margin for uncertainty. Under Solvency II, the Technical Provisions are valued based on the amount that the Company would have to pay if it were to transfer its insurance obligations to another insurance or reinsurance undertaking

The following steps are then taken to derive the Technical Provisions on a Solvency II basis:

1. Addition of allowance for “Events Not in Data” in Claims Provisions ().
2. Discounting of Claims Provision (using the Yield Curves from EIOPA).
3. Removal of UPR and AURR.
4. Removal of prudence margins calculated under the IFRS basis.
5. Deduction of Future Premium Cashflows.
6. Addition of Future Expenses and Commissions Cashflows.
7. Addition of Future Claims and Claims Expenses.
8. Discounting of Premium Provision (using the Yield Curves from EIOPA).
9. Addition of Risk Margin (calculated using the Standard Formula model).

The above adjustments are the only differences between the figures in the Company’s financial statements and the valuation under Solvency II. Please note the following:

- There are no matching adjustments applied
- There are no volatility adjustments used
- There are no transitional risk-free interest rate-term structures applied
- There are no transitional deductions applied

The key source of uncertainty in the Technical Provisions is the natural volatility of claims. both in terms of size and timing. Such claims are exposed to a range of uncertainty factors which include demographic factors and macroeconomic influences (such and inflation and currency movements). Additionally, Actuarial best estimates are subject to inherent uncertainty from changes in claim reporting and settlement patterns.

The greatest sources of uncertainty in the Technical Provisions stem from assumptions applied to newer insurance schemes where the Company has limited historic data.

There have not been any material changes to the methodologies utilised in calculating Technical Provisions over the last 12 months There have been some additional methodologies applied, not previously required, following the collapse of former parent Thomas Cook, such as provisioning for customer compensation due to loss of insurable interests.

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D.3 Other liabilities

	Financial Statements GBP £'m	Adjustment GBP £'m	Solvency II GBP £'m
Technical Provisions	13.7	-4.2	9.5
Insurance and intermediaries payable	0.6	0.3	0.9
Reinsurance Payables	0.0		0.0
Insurance Premium Tax Payable	0.3		0.3
Operating Cost Accruals	0.7		0.7
Other Accruals	0.1		0.1
Other Liabilities	0.1		0.1
Deferred Tax Liability	0.0	0.0	0.0
Total Liabilities	**15.6**	**-3.9**	**11.6**

As noted in section D.2, the Technical Provisions on the Solvency II Balance Sheet total £9.5m. This is markedly different to the Financial Statements valuation of £13.7m. The £4.2m adjustment can be explained as follows:

- As per section D.1, the premiums receivable but not yet due of £3.6m are deducted from Insurance and Intermediaries Receivable on the Asset side of the Balance Sheet and offset against the Technical Provision on the Liability side.
- £0.3m payables to claim service providers as classes as technical reserves under IFRS but as Insurance and Intermediaries Payable under SII.
- The remaining £0.3m valuation adjustment stems from the different treatments of provision calculations as described in section D.2.

All other liabilities are valued consistently with the IFRS Balance Sheet under true and fair valuation principles.

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E. CAPITAL MANAGEMENT

E.1 Overview

The Company uses the Standard Formula as defined by EIOPA to calculate the SCR. The Company deems the Standard Formula appropriate for use, given the nature of its risk profile. The Company was well capitalised at the reporting date with an SCR coverage ratio of 152%.

E.2 Own funds

The Company is a single shareholder entity. It has no debt financing nor does it have any plans to issue new shares in the short or medium term. The Company's capital planning process is dynamic and forward-looking and is informed by the output from its risk management activities and the Own Risk and Solvency Assessment process.

As such, capital planning activities shall take into account current and anticipated changes in the company's risk profile, such as those reflected in its business plan and forecasting the related impact on capital. In addition, as part of its capital planning, the Company shall integrate projected capital needs with its business planning and financial forecasting processes.

In order to ensure the maintenance of appropriate capital levels at all times, the Company has defined a specific capital risk appetite with thresholds and limits that shall trigger actions, including the source of capital and/or associated corrective actions.

These appetites have been developed in line with regulatory requirements under the Solvency II regime whilst also including an appropriate level of prudence over and above minimum levels.

Own funds are comprised of paid-up ordinary share capital, retained earnings as recorded on the Financial Statements and valuation basis difference on transition from the Financial Statement to SII Balance Sheets.

Excess of Assets over Liabilities	2019 Total GBP £'m	2018 Total GBP £'m	2019 Tier 1 GBP £'m	2019 Tier 2 GBP £'m	2019 Tier 3 GBP £'m
Ordinary Share Capital	0.5	0.5	0.5	-	-
Retained Earnings	11.2	16.2	11.2	-	-
Net Assets - Financial Statements	**11.7**	**16.7**	**11.7**	**-**	**-**
Financial Statement to SII Valuation Differences	0.0	0.2	0.0	-	-
Excess of Assets over Liabilities	**11.6**	**17.0**	**11.6**	**-**	**-**

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The eligible amount of own funds to cover the Solvency Capital Requirement and the Minimum Capital Requirement is £11.6m. This is comprised entirely of Tier 1 Basic Own Funds.

The following table reconciles the differences between the equity in the financial statements and the excess of the assets over liabilities as calculated for solvency purposes.

None of the Company's own funds are subject to transitional arrangements and the Company has no ancillary own funds. No deductions are applied to own funds and there are no material restrictions affecting their availability and transferability.

Reconciliation of Excess of Assets over Liabilities to Equity in the financial statements as at 31 December 2019

	GBP £'m
Total Equity in financial statements	**11.7**
Deduct	
Future administrative fees	-0.4
Future claims and claims expenses	-4.5
Risk Margin	-0.5
Deferred Tax Liability	0.0
Accrual for minimum reinsurance deposit	-0.3
Additional admin expense provision not allowable under IFRS	-0.1
Add	
Release of Unearned Premium Reserve & AURR	5.1
Margin held in IFRS not allowable in SII	0.6
Solvency II – Excess of Assets over Liabilities	**11.6**

E.3 Solvency Capital Requirement and Minimum Capital Requirement

The Company's Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR) at the end of the reporting period are as follows:

- SCR - £7.7m
    - Simplifications were used for the Non-Life CAT Risk submodule for Flood and Windstorm Risk, as prescribed by the delegated acts;
      There are no undertaking specific parameters used.
- MCR - £3.3m

The MCR is calculated based on the Net Written Premium over the reporting period, the Net Best Estimate Technical Provisions and the absolute floor of €3.7m (equivalent to GBP £3.1m as at the reporting date) as prescribed in Article 129(d)i of the directive. The SCR is calculated using the Standard Formula. The split by risk modules is as follows:

Solvency Capital Requirement by Risk Module

	GBP £'m	GBP £'m
	2019	**2018**
Non-Life Underwriting Risk	5.0	6.1
Health Underwriting Risk	2.1	2.2
Market Risk	2.1	2.2
Counterparty Default Risk	0.4	0.3
Intangibles SCR	0.0	0.0
Diversification Allowance	-2.9	-3.1
Basic SCR	**6.7**	**7.7**
LAC of Deferred Tax	0	-0.3
Operational Risk	1	0.7
SCR	**7.7**	**8.1**

Material changes from the previous reporting period in the SCR are as follows:

- The Non-Life Underwriting module capital requirements have decreased by close to 20% primarily driven by the loss of Thomas Cook related business from the next 12 months earned premium measure and a decrease in the Non-Life Catastrophe risk sub-modules.
- The loss absorbing capacity of deferred tax is now zero because a loss is being posted this year in the P&L.

Operational Risk has increased by 0.3m due to an increase in the previous 12 months earned premium measure.

E.4 Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement

The Company has opted not to use the duration-based equity risk sub-module of the Solvency II regulations.

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

The company maintained sufficient capital to meet the SCR and MCR at all points in the preceding 12 months to the reporting date.

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QRT Templates for the SFCR Public Disclosure

S.02.01.02

Balance Sheet

000s

		Solvency II value
Assets		C0010
Intangible assets	R0030	65
Deferred tax assets	R0040	-
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	104
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	500
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	500
Equities	R0100	-
Equities - listed	R0110	-
Equities - unlisted	R0120	-
Bonds	R0130	-
Government Bonds	R0140	-
Corporate Bonds	R0150	-
Structured notes	R0160	-
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	-
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
Loans and mortgages	R0230	-
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	- 316
Non-life and health similar to non-life	R0280	- 316
Non-life excluding health	R0290	-
Health similar to non-life	R0300	- 316
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	2,338
Reinsurance receivables	R0370	-
Receivables (trade, not insurance)	R0380	718
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	19,985
Any other assets, not elsewhere shown	R0420	- 0
Total assets	R0500	23,394
Liabilities		
Technical provisions – non-life	R0510	9,547
Technical provisions – non-life (excluding health)	R0520	6,638
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	6,278
Risk margin	R0550	360
Technical provisions - health (similar to non-life)	R0560	2,910
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	2,749
Risk margin	R0590	161
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	-
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	-
Risk margin	R0680	-
Technical provisions – index-linked and unit-linked	R0690	-
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	-
Risk margin	R0720	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	-
Pension benefit obligations	R0760	-
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	-
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	-
Insurance & intermediaries payables	R0820	869
Reinsurance payables	R0830	0
Payables (trade, not insurance)	R0840	1,338
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	-
Total liabilities	R0900	11,754
Excess of assets over liabilities	R1000	11,639

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QRT Templates for the SFCR Public Disclosure

S.05.01.02

Premiums, Claims and Expenses

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		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Line of Business for: accepted non-proportional reinsurance				Total
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
Premiums Written																		
Gross - Direct Business	R0110	15,080	-	-	-	64	-	1,146	-	-	-	15,725	54	-	-	-	-	32,069
Gross - Proportional reinsurance accepted	R0120	2,931	-	-	-	-	-	-	-	-	-	2,705	-	-	-	-	-	5,637
Gross - Non-proportional reinsurance accepted	R0130	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0140	524	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	524
Net	R0200	17,488	-	-	-	64	-	1,146	-	-	-	18,430	54	-	-	-	-	37,182
Premiums Earned																		
Gross - Direct Business	R0210	14,939	-	-	-	86	-	962	-	-	-	16,138	27	-	-	-	-	32,152
Gross - Proportional reinsurance accepted	R0220	2,785	-	-	-	-	-	-	-	-	-	2,570	-	-	-	-	-	5,355
Gross - Non-proportional reinsurance accepted	R0230	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0240	524	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	524
Net	R0300	17,200	-	-	-	86	-	962	-	-	-	18,708	27	-	-	-	-	36,984
Claims Incurred																		
Gross - Direct Business	R0310	7,391	-	-	-	73	-	636	-	-	-	14,234	28	-	-	-	-	22,362
Gross - Proportional reinsurance accepted	R0320	1,681	-	-	-	-	-	-	-	-	-	2,864	-	-	-	-	-	4,545
Gross - Non-proportional reinsurance accepted	R0330	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0340	- 233	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	- 233
Net	R0400	9,305	-	-	-	73	-	636	-	-	-	17,098	28	-	-	-	-	27,141
Changes in other technical provisions																		
Gross - Direct Business	R0410	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gross - Proportional reinsurance accepted	R0420	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	R0430	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0440	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Net	R0500	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Expenses incurred	R0550	3,820	-	-	-	11	-	197	-	-	-	3,401	9	-	-	-	-	7,438
Other expenses	R1200	4,052	-	-	-	-	-	-	-	-	-	3,740	-	-	-	-	-	7,791
Total expenses	R1300	7,872	-	-	-	11	-	197	-	-	-	7,141	9	-	-	-	-	15,230

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QRT Templates for the SFCR Public Disclosure

S.05.02.01

Premiums, Claims and Expenses by Country

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		Home Country	Top 5 Countries (by amount of gross premium written) - non-life obligations					Total Top 5 and Home Country
	R0010		UK	Sweden	Germany	Spain	N/A	
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums Written								
Gross - Direct Business	R0110	2,775	14,129	3,453	-	10,383		30,741
Gross - Proportional reinsurance accepted	R0120	-	-	-	3,620	2,017		5,637
Gross - Non-proportional reinsurance accepted	R0130	-	-	-	-	-		-
Reinsurers' share	R0140	43	344	-	-	136		524
Net	R0200	2,732	13,785	3,453	3,620	12,264		35,854
Premiums Earned								
Gross - Direct Business	R0210	2,674	15,721	3,927	-	8,536		30,859
Gross - Proportional reinsurance accepted	R0220	-	-	-	3,620	1,736		5,355
Gross - Non-proportional reinsurance accepted	R0230	-	-	-	-	-		-
Reinsurers' share	R0240	43	344	-	-	136		524
Net	R0300	2,631	15,377	3,927	3,620	10,136		35,691
Claims Incurred								
Gross - Direct Business	R0310	1,744	8,498	3,850	-	6,877		20,968
Gross - Proportional reinsurance accepted	R0320	-	-	-	2,949	1,596		4,545
Gross - Non-proportional reinsurance accepted	R0330	-	-	-	-	-		-
Reinsurers' share	R0340	- 233	-	-	-	-		- 233
Net	R0400	1,977	8,498	3,850	2,949	8,473		25,747
Changes in other technical provisions								
Gross - Direct Business	R0410	-	-	-	-	-		-
Gross - Proportional reinsurance accepted	R0420	-	-	-	-	-		-
Gross - Non-proportional reinsurance accepted	R0430	-	-	-	-	-		-
Reinsurers' share	R0440	-	-	-	-	-		-
Net	R0500	-	-	-	-	-		-
Expenses incurred	R0550	464	3,281	367	1,200	1,984		7,297
Other expenses	R1200	-	7,791	-	-	-		7,791
Total expenses	R1300	464	11,072	367	1,200	1,984	-	15,089

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QRT Templates for the SFCR Public Disclosure

S.17.01.02

Non-Life Technical Provisions

000s

		Direct business and accepted proportional reinsurance												Accepted non-proportional reinsurance				Total Non-Life obligation
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Technical provisions calculated as a sum of BE and RM																		
Best Estimate																		
Premium Provisions																		
Gross	R0060	703	-	-	-	-1	-	17	-	-	-	2,394	14	-	-	-	-	3,127
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	-316	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-316
Net Best Estimate of Premium Provisions	R0150	1,019	-	-	-	-1	-	17	-	-	-	2,394	14	-	-	-	-	3,443
Claims Provisions																		
Gross	R0160	2,047	-	-	-	4	-	77	-	-	-	3,756	17	-	-	-	-	5,900
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Net Best Estimate of Claims Provisions	R0250	2,047	-	-	-	4	-	77	-	-	-	3,756	17	-	-	-	-	5,900
Total Best estimate - gross	R0260	2,749	-	-	-	4	-	94	-	-	-	6,149	31	-	-	-	-	9,027
Total Best estimate - net	R0270	3,065	-	-	-	4	-	94	-	-	-	6,149	31	-	-	-	-	9,343
Risk margin	R0280	161	-	-	-	0	-	11	-	-	-	347	2	-	-	-	-	520
Amount of the transitional on Technical Provisions																		
Technical Provisions calculated as a whole	R0290	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Best estimate	R0300	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Risk margin	R0310	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Technical provisions - total																		
Technical provisions - total	R0320	2,910	-	-	-	4	-	105	-	-	-	6,496	33	-	-	-	-	9,547
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	-316	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-316
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	3,226	-	-	-	4	-	105	-	-	-	6,496	33	-	-	-	-	9,863

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QRT Templates for the SFCR Public Disclosure

S.19.01.21

Non-Life Insurance Claims (Total Non-Life Business)

000s

Z0010	Accident Year

Gross Claims Paid (Non-Cumulative)

		Development 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
Prior	R0100												R0100		
N-9	R0160	12,798	3,408	124	23	-16	54	-1	1	-0	2		R0160	2	16,392
N-8	R0170	15,794	3,107	64	15	12	26	22	5	5			R0170	5	19,049
N-7	R0180	14,800	3,221	231	44	12	2	-0	2				R0180	2	18,312
N-6	R0190	13,498	1,940	100	32	41	8	2					R0190	2	15,620
N-5	R0200	10,353	2,431	101	21	36	2						R0200	2	12,944
N-4	R0210	9,378	2,269	75	52	4							R0210	4	11,778
N-3	R0220	10,196	2,109	57	22								R0220	22	12,385
N-2	R0230	11,593	1,873	123									R0230	123	13,590
N-1	R0240	13,499	3,030										R0240	3,030	16,529
N	R0250	16,428											R0250	16,428	16,428
												Total	R0260	**19,620**	**153,026**

Gross undiscounted Best Estimate Claims Provisions

		Development 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
Prior	R0100												R0100	
N-9	R0160										31		R0160	31
N-8	R0170									0			R0170	0
N-7	R0180								4				R0180	4
N-6	R0190							0					R0190	0
N-5	R0200						1						R0200	1
N-4	R0210					51							R0210	51
N-3	R0220				6								R0220	6
N-2	R0230			19									R0230	19
N-1	R0240		187										R0240	187
N	R0250	5,599											R0250	5,602
												Total	R0260	**5,900**

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QRT Templates for the SFCR Public Disclosure

S.23.01.01
Own Funds
000s

		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						
Ordinary share capital (gross of own shares)	R0010	500	500	-	-	-
Share premium account related to ordinary share capital	R0030	-	-	-	-	-
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	-	-	-	-	-
Subordinated mutual member accounts	R0050	-	-	-	-	-
Surplus funds	R0070	-	-	-	-	-
Preference shares	R0090	-	-	-	-	-
Share premium account related to preference shares	R0110	-	-	-	-	-
Reconciliation reserve	R0130	11,139	11,139	-	-	-
Subordinated liabilities	R0140	-	-	-	-	-
An amount equal to the value of net deferred tax assets	R0160	-	-	-	-	-
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	-	-	-	-	-
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						
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	-	-	-	-	-
Deductions						
Deductions for participations in financial and credit institutions	R0230	-	-	-	-	-
Total basic own funds after deductions	R0290	11,639	11,639	-	-	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	-	-	-	-	-
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	-	-	-	-	-
Unpaid and uncalled preference shares callable on demand	R0320	-	-	-	-	-
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	-	-	-	-	-
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	-	-	-	-	-
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	-	-	-	-	-
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	-	-	-	-	-
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370			-	-	-
Other ancillary own funds	R0390			-	-	-
Total ancillary own funds	R0400			-	-	-
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	11,639	11,639	-	-	-
Total available own funds to meet the MCR	R0510	11,639	11,639	-	-	-
Total eligible own funds to meet the SCR	R0540	11,639	11,639	-	-	-
Total eligible own funds to meet the MCR	R0550	11,639	11,639	-	-	-
SCR	R0580	7,666	-	-	-	-
MCR	R0600	3,255	-	-	-	-
Ratio of Eligible own funds to SCR	R0620	152%	-	-	-	-
Ratio of Eligible own funds to MCR	R0640	358%	-	-	-	-

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	11,639
Own shares (held directly and indirectly)	R0710	-
Foreseeable dividends, distributions and charges	R0720	-
Other basic own fund items	R0730	500
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	-
Reconciliation reserve	R0760	11,139
Expected Profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	-
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	- 3,580
Total Expected profits included in future premiums (EPIFP)	R0790	- 3,580

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QRT Templates for the SFCR Public Disclosure

S.25.01.21

Solvency Capital Requirement

000s

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
Market risk	R0010	2,072	-	-
Counterparty default risk	R0020	411	-	-
Life underwriting risk	R0030	-	-	-
Health underwriting risk	R0040	2,056	-	-
Non-life underwriting risk	R0050	4,994	-	-
Diversification	R0060	- 2,913	-	-
Intangible asset risk	R0070	52	-	-
Basic Solvency Capital Requirement	R0100	6,673	-	-

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	993
Loss-absorbing capacity of technical provisions	R0140	-
Loss-absorbing capacity of deferred taxes	R0150	-
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	-
Solvency Capital Requirement excluding capital add-on	R0200	7,666
Capital add-on already set	R0210	-
Solvency capital requirement	R0220	7,666
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	-
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	-
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	-
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	-
Diversification effects due to RFF nSCR aggregation for article 304	R0440	-

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QRT Templates for the SFCR Public Disclosure

S.28.01.01

Minimum Capital Requirement

000s

		MCR components
		C0010
MCRNL Result	R0010	3,255

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020	3,065	13,932
Income protection insurance and proportional reinsurance	R0030	-	-
Workers' compensation insurance and proportional reinsurance	R0040	-	-
Motor vehicle liability insurance and proportional reinsurance	R0050	-	-
Other motor insurance and proportional reinsurance	R0060	4	85
Marine, aviation and transport insurance and proportional reinsurance	R0070	-	-
Fire and other damage to property insurance and proportional reinsurance	R0080	94	1,150
General liability insurance and proportional reinsurance	R0090	-	-
Credit and suretyship insurance and proportional reinsurance	R0100	-	-
Legal expenses insurance and proportional reinsurance	R0110	-	-
Assistance and proportional reinsurance	R0120	6,149	14,093
Miscellaneous financial loss insurance and proportional reinsurance	R0130	31	54
Non-proportional health reinsurance	R0140	-	-
Non-proportional casualty reinsurance	R0150	-	-
Non-proportional marine, aviation and transport reinsurance	R0160	-	-
Non-proportional property reinsurance	R0170	-	-

MCR(L) Result	R0200	-

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

		C0070
Linear MCR	R0300	3,255
SCR	R0310	7,666
MCR cap	R0320	3,450
MCR floor	R0330	1,916
Combined MCR	R0340	3,255
Absolute floor of the MCR	R0350	3,145

		C0070
Minimum Capital Requirement	R0400	3,255