# **PAYCARE**

# Company number 00820791

**Registered office address** 

Paycare House, George Street, Wolverhampton, West Midlands, WV2 4DX

# **Year Ending 31 December 2018**

# **SOLVENCY AND FINANCIAL CONDITION REPORT**





# **DEFINITIONS**

SII	Solvency II
the reporting date	31 December 20178
the reporting period	Year to 31 December 2018
the Company	Paycare
SFCR	Solvency and Financial Condition Report
ORSA	Own Risk and Solvency Assessment
SCR	Solvency Capital Requirement
MCR	Minimum Capital Requirement
UK GAAP	United Kingdom Generally Accepted Accounting Principles
RLAM	Royal London Asset Management
JPM	JP Morgan
LBPB	Lloyds Bank Private Banking
AFM	Association of Financial Mutuals
IPT	Insurance Premium Tax
CSR	Corporate Social Responsibility
ICG	Internal Capital Guidance
NBV	Net Book Value
GDPR	General Data Protection Regulation





#### **CONTENTS**

# 2. Business and Performance

- 2.1 The Business
- 2.2 Underwriting Performance
- 2.3 Investment Performance

#### 3. System of Governance

- 3.1 General Governance Arrangements
- 3.2 Fit and Proper Requirements
- 3.3 Risk Management System
- 3.4 ORSA
- 3.5 Internal Control System
- 3.6 Internal Audit Function
- 3.7 Actuarial Function
- 3.8 Outsourcing

#### 4. Risk Profile

- 4.1 Underwriting Risk
- 4.2 Market Risk
- 4.3 Credit Risk
- 4.4 Liquidity Risk
- 4.5 Operational Risk

# 5. Valuation for Solvency Purposes

- 5.1 Assets
- 5.2 Technical Provisions
- 5.3 Other Liabilities

# 6. Capital Management

- 6.1 Own funds
- 6.2 MCR and SCR
- 6.3 Non-compliance with the MCR and SCR



# 1. Executive Summary

This is the third SFCR of the company based on financial position as at 31st December 2018

"Our vision is nothing less than realizing the full potential of our people, delivering outstanding customer outcomes and making every day healthcare accessible to all"



To ensure that we achieve our vision the business focus will be split into four steams.

#### **Customers**

Paycare exists for the benefit of our Customers. It is the reason for our existence. We will always put them at the heart of everything we do.

We are here for our policyholders and will ensure that they get value and benefit from their policy with us. We not only look to meet our customer's expectation but to exceed them and actively encourage our policyholders to be proactive in the management of their everyday healthcare by producing content that helps our customers strive for this goal. We will also look to recognise trends in the NHS and develop our products accordingly for the benefit of our policyholders.

We welcome and embrace feedback from our policyholders in order to continue to improve as a business. The FCA Principles for Businesses (6) states "A *firm* must pay due regard to the interests of its *customers* and treat them fairly". This principle is fully embedded in the company.

The FCA Principles for Businesses (1) states "A firm must conduct its business with integrity". The Paycare brand is a trusted one, we will ensure this is protected and look to enhance the value of this trust to existing and future customers. We will always look to ensure that our compliance with good IT governance principles is adhered to.



# **People**

# Our people ARE our most important asset. We believe and embrace that always. We will strive to nurture, challenge and show respect for them

We believe that is essential for excellent performance that our employees are rested and energised when they come to work. We believe that a life outside of work is vital to achieving this and always strive to get that balance right. We continue to embed the mindfulness in the workplace practice, acknowledging that this is not for everyone and accepting non-participation. We trust our people to make the right decisions and support them when they don't. Our culture is one of non-blame, non-judgemental.

Succession planning is vital to the long term success and sustainability of any business. Our aim is to ensure continual development of our team, meeting their needs and expectations and also the demands of the business.

#### **Technology**

#### Technology will drive efficiencies in the business and deliver a better customer experience

We shall strive for operational excellence and embrace new technologies to deliver maximum benefit to our policyholders.

#### **Communities**

#### We don't just talk about CSR, we embrace it and demonstrate our commitment to it.

The company is a really respected part of our community and we pride ourselves on what we can give back to that community. It is therefore essential that we have a sustainable business model that takes us into our next 140 years, by doing so we shall be able to fulfil our desire to continue giving back to our community.



#### 2. Business and Performance

#### 2.1 The Business

Paycare is a company limited by guarantee. Our company number is 00820791

The company is a category 5 firm and therefore has no named supervisor and is managed through the smaller insurer regime. The company is approved and authorised by the PRA and regulated by the PRA and the FCA.

The Company was founded in 1874 and is a provider of healthcare cash plans throughout the UK

#### 2.2 Underwriting Performance

We continue to see an increase in our Company paid policies; we also see the continuing trend of decreases in individual policies. This reflects the trend in our industry. The consequence of this movement is a reduction in the average premium income we receive per policyholder.

We saw increases in Insurance premium tax (IPT) in both 2015 and 2016 and a further increase implemented in 2017. We are aware of the fiscal pressures on our Policyholders and the many hundreds of businesses that are our customers. To this end The Board decided to not pass on the full impact of IPT increase and instead change some of our less well used benefits. This continued to have a negative effect on the Operating profit for the year. A price increase was implemented in June 2018 and this aims to claw back the IPT increases implemented during this period.

We paid £795k in IPT in 2018, this compared to £399k in 2014 an increase of £396k (100%).

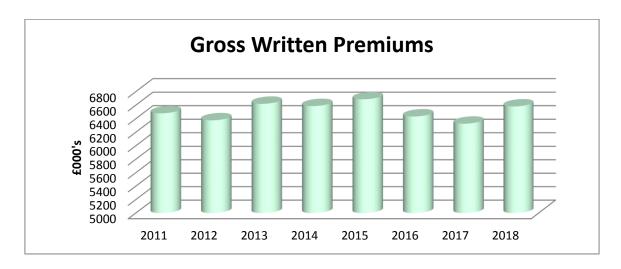
We continue to lobby regulators and government through our trade association to highlight the consequences of what the impacts will be if they continue to see the raising of IPT as an easy target for revenue collection.

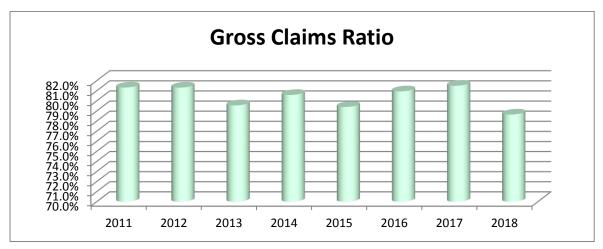
Claims ratio can be an unpredictable area to control and we mitigate adverse effects by utilising various monitoring methods. The increases in IPT that have been absorbed by us have had the effect of increasing the claims ratio over recent years. Our policies are monthly renewable and can be amended by giving one months' notice to policyholders. We continue to experience a trend in increasing claims as policyholders choose our products to enable them to have timely access to qualified healthcare providers to improve their health & wellbeing rather than wait for NHS treatment. We have seen a marked shift in claims numbers



and values, predominantly in Professional Therapy and other benefits which policyholders can choose to utilise. To mitigate the effect of Increased IPT costs and healthcare price inflation we have had to increase the premiums of some of our policies. In 2018 this resulted in a decrease in claims ratio.

The company does not have any reinsurance.





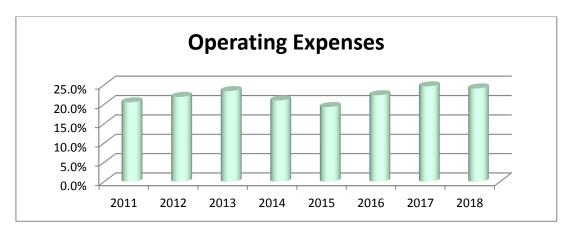
Operating expenses have increased over the past few years with the introduction of the SII regime now in force and we have seen our professional fees increase by 60% since 2014 due to employing the services of consultants, actuaries and similar professionals to ensure that we were and remain complaint with regulated requirements. We have seen many benefits from the introduction of the regime however the increased cost to the business requires us to embrace technology to drive down other operating expenses.

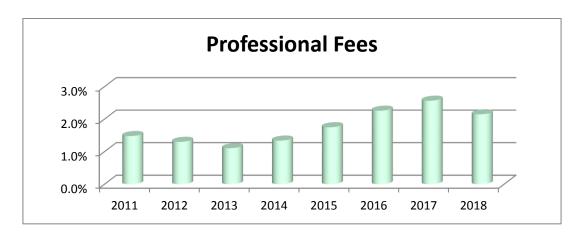
Paycare always looks to innovate in all areas of our business. Our industry is undergoing changes at a rapidly accelerating rate, and those who are unwilling or unable to keep up risk being left behind. Technology brings many benefits to the insurance industry. With faster,



easier access to more information, we've seen dramatic increases in productivity and efficiency. We shall continue to invest in Technology, learning both from inside the UK and globally, particularly where we see this improving our customers experience with us.

Increased use of technology however brings with it new risks. GDPR came into effect in late 2018 to protect our customers private data. Paycare ensured that it was compliant with the regulation and has processes and policies embedded for ongoing compliance.





#### 2.3 Investment Performance

At the reporting date our investment assets are analysed as follows:

Collective Investment Fund £4.5m
 Property £0.3m
 Total £4.8m

The company also hold liquid assets such as cash to meet any short-term liabilities. These assets are held in the name of the company.



The investments are currently registered in the name of Royal London Asset Management. The board meets with our fund managers at least once a year to discuss the performance of the fund and our requirements going forward. Senior management have regular correspondence with our fund managers and actuaries.



# 3. System of Governance

### 3.1 General Governance Arrangements

The company is a Not for Profit organisation limited by guarantee.

The Board is responsible for corporate governance, reputation of the company and stewardship of its policyholders.

The composition of the Board and Board succession are managed to maintain the range of skills required to direct and govern the company and support as well as challenge management constructively.

Appointment of non-executive directors is the responsibility of the Board of Directors.

Directors serve 3-year terms for a maximum of 3 terms, however the company recognises the benefit of continuity of some directors serving for longer than 9 years subject to approval.

The Board approves all company policies via an official approval process. Board directors take individual and collective responsibility for determining the company objectives and strategies to ensure the company is managed and directed in a way to determine best outcome for policyholders as a whole.

On 10<sup>th</sup> December 2018 The Senior Managers & Certification Regime (SM&CR) came into force for insurers.

The aim of SM&CR is to increase accountability of individuals and to influence the behaviours of individuals and ultimately culture in the financial services sector

Senior Managers will have a 'duty of responsibility'. This means that the Financial Conduct Authority (FCA) can take action against a senior manager where any breaches or contraventions occur in their area of responsibility, if the FCA can demonstrate that the senior manager did not take reasonable steps to prevent the breach occurring or from continuing.

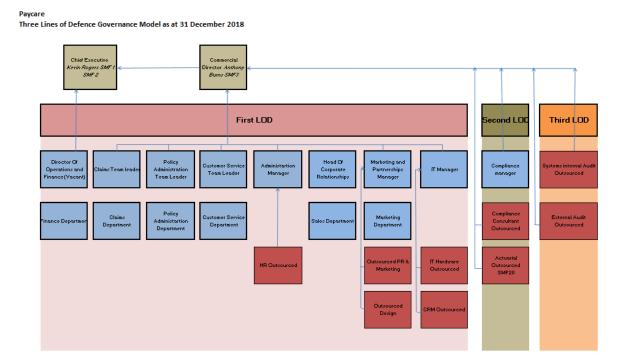
Paycare is compliant with SM&CR and has processes and policies in place to ensure ongoing compliance.

The company adopts an approach that represents the nature, scale and complexity of the business in respect of the SM&CR functions of risk management, internal audit and actuarial functions to deliver the desired outcomes. The CEO holds the majority of SMR functions.

The company are members of the AFM and subscribes to the Annotated UK corporate governance code for Mutuals.



# The company operates a three line of defence governance model.



#### 3.2 Fit and Proper

Directors are appointed under the 'fit and proper' process adopted by the company. 'Fit and proper' is reviewed annually and there is a continuing obligation to advise the chairman if at any point individuals are unable to fill the requirements.

The company processes used to determine, honesty, integrity, reputation, competence/capability and financial soundness involves various checks as listed

- · Credit checks,
- Criminal record checks
- Identity checks (including passport)
- Financial sanctions and Anti money laundering check
- FCA register search
- UK directorship search
- Social media checks

A personal declaration and an assessment of the individual's skills, knowledge and experience to undertake the role is also undertaken.



#### 3.3 Risk Management System

The company identifies and manages risk within a clearly defined framework and this framework forms the major risk elements of the company's ORSA. The framework is again underpinned by a 3 lines of defence mechanism.

The Board have ultimate responsibility for identifying and managing the risks that face the business and determine the risk appetite of the company and the Risk and Audit committee directly oversee the framework. Executive directors and senior management manage risks on an operational basis.

Executive directors and senior management meet at least once a year to review assess and update the risk register in full and present this to the Risk and Audit committee for approval. The Risk and Audit committee recommend final approval by the Board.

Senior management prepare at least annually an ICG report to determine how much additional capital it is felt the company should hold to cover the risks identified.

The company also has a full business continuity plan which is regularly updated.

#### **3.4 ORSA**

The company is reporting on the standard formula basis, the Board decided that this was appropriate for the needs of the business, and did not apply for an internal or partial internal model. The company has a waiver for quarterly reporting which is valid until 1<sup>st</sup> January 2021

The company does not have a defined benefit pension scheme or any material reinsurance in place.

The ORSA process pulls together all the elements of the risk work carried out within the business and ensures appropriate monitoring takes place.

The ORSA is updated at least annually following the business planning process and at any point where a material change to the business is to take place. It is formally reviewed by the Risk and Audit committee prior to full approval by the Board.



#### 3.5 Internal Control System

The company maintains an internal control system that governs financial and regulatory reporting in the company. This framework aims to ensure that

- All risks that pertain to the preparation and fair representation of the financial statements in accordance with the applicable financial reporting framework have been identified and documented
- There are controls, manual and automated, in place to address these risks and they
  are adequately designed to prevent or detect material misstatements in the financial
  statements and disclosures
- The controls identified operate as they are supposed to and are appropriately evidenced.

Within the control framework the company focuses on various key elements as stated:

- Company culture and shared values that bind the organisation
- Personal development plans are agreed for all employees and each employee will undergo a formal performance appraisal at least annually
- Training and development of all employees from Board level to staff
- Treating customers fairly is embedded across the organisation

Compliance is the responsibility of all within the business and this is overseen by the compliance manager who ensures all relevant legislation and regulation is embedded in the business and adhered to.

Senior managers prepare monthly internal process checks across all functions which includes monitoring telephone calls, new business and due diligence, claims payments and correct authorisation of expenditure. The results are reported to the Compliance manager who oversees this process and reports quarterly to the Board.

The compliance function is responsible for reporting to senior management and the Board any breaches or non-compliance with its policies, rules and regulations.

#### 3.6 Internal Audit Function

To achieve independence and objectivity the Board felt this function should be headed up by an external third party and the services of Mazars were engaged to perform this function.

All aspects of internal audit will be covered through a 3-year plan as agreed with the Board and reporting lines are directly to the Risk and Audit committee.



#### 3.7 Actuarial Function

The Board has considered the structure of the actuarial function to be proportional in constitution but complete in scope. The function holder for the actuarial function is Kathryn Moore. Kathryn is employed as a Senior Actuary with Steve Dixon Associates LLP (SDA). Kathryn presents an annual actuarial report to the Board.

The company has engaged the services of SDA to work alongside the Finance Manager in identifying analysing and quantifying levels of risks as required under SII and is reviewed and approved by the CEO.

#### 3.8 Outsourcing

The company have in place an outsourcing policy and all key third party suppliers undergo due diligence and comprehensive service agreements are put in place to ensure that policyholder outcomes are not put at risk.

The Board considers the outsourcing arrangements at the company to be proportional in nature.

The company currently utilises the following service providers to undertake critical or important functions on its behalf:

- IT Outsourcing services including hosting services, software maintenance and support and development activities
- Internal Audit services
- Actuarial services
- Website services
- Compliance Consultant
- Human Resources



#### 4. Risk Profile

#### 4.1 Underwriting Risk

Underwriting risk is the risk of making a loss on an activity or insurance either in assessing the risks it provides policies for or in quantifying claims that occur.

The following measures are used to assess underwriting risks:

- Experience analysis the company projects the expected premiums and claims that it
  anticipates for the year ahead and tracks the performance against expected rates and
  reports results to the executive committee. Any deviations from expected results are
  identified and corrective action where necessary are put in place. Corrective actions
  available include changes in premium prices and amendments to benefits received.
- Economic capital modelling the company has developed methodologies to assess underwriting risks and involves analysis of changing patterns in claims and premiums over time. This analysis gives indication of a deterioration or improvement to underwriting risk profile of the business over a period of time.
- The SII standard formula Capital requirement requires an assessment and quantification of the underwriting risk exposure.

The principal risk faced by the company is that actual claims and benefit payments exceed the premiums received for those benefits. This could occur because the frequency and severity of claims are greater than anticipated. Claim events for certain benefits can be random and the actual number and amount of claims and benefits could vary year on year from the level estimated using estimation techniques as described above.

#### 4.2 Market Risk

The company's core business is the writing of everyday health cash plans which are monthly renewable and have a short claims tail. Given this short duration a relatively conservative investment strategy is taken.

Market risk the company faces is that an adverse movement in the value of assets caused by changes in the value of interest rates, credit rating scores or equity prices is not matched by a corresponding movement in the value of liabilities. The company's investment policy ensures a suitable balance of assets and testing of the impact of particular events on these assets, for example a downturn in equities which is critical as part of our SII work in the calculation of the SCR.



#### 4.3 Credit Risk

The company does not have any credit risk exposure to reinsurance counterparties.

The primary credit risk to the company arises from counterparties holding the companies' assets as there is a risk they will default when the company requires the funds. The company holds a managed fund with RLAM which holds various investments to mitigate this risk.

The SII standard formula requirement includes an assessment and quantification of credit risk exposure.

#### 4.4 Liquidity Risk

Liquidity risk is the risk that the business may be unable to meet its obligations as they fall due as a consequence of having insufficient accessible funds.

The company does not consider liquidity risk to be a significant risk as highly liquid assets such as cash and instant access deposits are held within the business to cover the highest claims month over a rolling twelve month period.

#### 4.5 Operational Risk

Operational risk relates to the risk of loss resulting from inadequate or failing internal processes, people and systems or from external events such as a natural disaster or terrorist attack.

Material operational risks that are assessed include:

- Cyber/data security the risk of the inability to protect data from unauthorised use, disclosure, disruption, modification and /or destruction.
- Outsourcing the risk of failure, non-performance, ineffective management or retention of employees and/or contractors.
- People the risk of inadequate recruitment process, development, management or retention of employees and/or contractors



# 5. Valuation for Solvency Purposes

#### 5.1 Assets

The table below sets out the basis of our SII asset valuation for each material class of asset. Assets are measured on a market value basis at the reporting date.

Assets	SII Value £000's	UK GAAP Value £000's
Property, plant & equipment (own use)	896	815
Investment Property	266	266
Collective Investments	4,475	4,475
Insurance and intermediaries receivables	370	370
Cash and cash equivalents	444	444
Any other assets, not elsewhere shown	17	97
Total assets	6,468	6,467

- Property is valued at fair value under SII and NBV in the annual financial statements which follow UK GAAP.
- Plant & equipment The Board considers that there is minimal difference between the UK GAAP valuation and the SII value.
- Investment Property is valued on the same basis as the annual financial statements. Valuations are based on the Board assessment of market value with full valuations being made by an independent professionally qualified valuer periodically as required.
- Investments are valued for SII purposes on the same value as the financial statements which follow UK GAAP. These are valued at market value at the reporting date.
- Insurance and intermediaries receivables under UK GAAP these relate primarily to amounts owed to us by policyholders.
- Cash and cash equivalents the cash holdings are held in the name of the company, they are instant access and the company has no issues withdrawing or moving money held in these accounts.
- Prepayments under Solvency II these services are valued at nil as they cannot be transferred to another party.



#### **5.2 Technical Provisions**

The table below gives a summary of the SII and UK GAAP valuations of technical provisions split between best estimate and risk margin.

Technical Provisions	SII Value £000's	UK GAAP Value £000's
Technical Provisions (Best Estimate)	370	154
Risk Margin	74	-
Total	444	154

The company's technical provisions consist of the claims and premium technical provisions which form the best estimate and the risk margin. These are set out in accordance with SII regulations. The UK GAAP technical provisions relate to claims only.

Best estimates are determined using forward looking projections of all in-force policies and claims. The company includes all its business under 'medical expenses insurance' and all business is direct, there is no inward reinsurance.

Risk margin is calculated using SII standard formula criteria.

The company consider that the technical provision is prepared on a suitable basis and in line with legislation.



#### **5.3 Other Liabilities**

The table below sets out other liabilities under SII and UK GAAP valuations

Other Liabilities	SII Value £000's	UK GAAP Value £000's
Deferred Tax	0	0
Insurance & intermediaries payables	13	13
Trade payables	317	317
Other liabilities	197	197
<b>Total Other Liabilities</b>	527	527

Deferred tax liabilities are recognised when transactions or events have occurred at the reporting date that will result in an obligation to pay tax in the future. Deferred tax liabilities relate to unrealised gains on investments. Unrealised tax on gains on investments at 31<sup>st</sup> December 2018, when realised can be added to the tax payable. At the reporting date no specific date has been set for the sale of assets.

Trade payables, including IPT payable are valued at fair value at the reporting date. The financial statements include 'insurance & intermediaries payable' in 'creditors'. There are no differences in valuation under UK GAAP



# 6. Capital Management

#### 6.1 Own Funds

The objectives of the business are to maintain sufficient funds to cover MCR and SCR with an appropriate buffer.

The company's own funds consist 100% of policyholder's funds arising from retained profits which have arisen from past underwriting and investment surpluses. There are no restrictions on the availability of the company's own funds to support the MCR and SCR and are therefore classified as Tier 1.

#### 6.2 SCR and MCR

The company applies the standard formula, without modification for undertaking specific parameters and has not used any simplifications allowed by the regulators. The final values remain subject to supervisory assessment.

	Dec 18 SII Value	Dec 17 SII Value
	£000's	£000's
Market Risk	1,133	1,048
Counterparty Risk	140	142
Health Underwriting Risk	1,032	1,094
Diversification	(543)	(540)
Operational Risk	199	193
SCR	1,961	1,937
MCR	2,222	2,196
Own Funds	5,498	5,793
Solvency Ratio	247%	264%

MCR is the result of the formula component calculated in accordance with article 248 (1) of Delegated Regulation 2015/35 of Delegated Regulation 2015/35.



# **6.3 Non-compliance with MCR and SCR**

The company has fully complied with the standard formula calculation for MCR and SCR and has had sufficient assets to cover the technical provisions and MCR (and therefore the SCR) at all times during 2018.

The company has not identified any area where uncertainties are likely to lead to a material misstatement of our capital requirements.



# Paycare

# Solvency and Financial Condition Report

**Disclosures** 

31 December

2018

(Monetary amounts in GBP thousands)

#### General information

Undertaking name
Undertaking identification code
Type of code of undertaking
Type of undertaking
Country of authorisation
Language of reporting
Reporting reference date
Currency used for reporting
Accounting standards

Method of Calculation of the  $\ensuremath{\mathsf{SCR}}$ 

Matching adjustment

Volatility adjustment

Transitional measure on the risk-free interest rate  $% \left( 1\right) =\left( 1\right) \left( 1\right) \left$ 

Transitional measure on technical provisions

Paycare
213800H3VDM7SWS7BQ64
LEI
Non-life undertakings
GB
en
31 December 2018
GBP
Local GAAP
Standard formula
No use of matching adjustment
No use of volatility adjustment
No use of transitional measure on the risk-free interest rate
No use of transitional measure on technical provisions

#### List of reported templates

S.02.01.02 - Balance sheet

 $\ensuremath{\mathsf{S.05.01.02}}$  - Premiums, claims and expenses by line of business

S.05.02.01 - Premiums, claims and expenses by country

S.17.01.02 - Non-Life Technical Provisions

S.19.01.21 - Non-Life insurance claims

S.23.01.01 - Own Funds

S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula

S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

# S.02.01.02

# **Balance sheet**

		Solvency II value
	Assets	C0010
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	896
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	4,741
R0080	Property (other than for own use)	266
R0090	Holdings in related undertakings, including participations	0
R0100	Equities	0
R0110	Equities - listed	
R0120	Equities - unlisted	
R0130	Bonds	0
R0140	Government Bonds	0
R0150	Corporate Bonds	0
R0160	Structured notes	0
R0170	Collateralised securities	0
R0180	Collective Investments Undertakings	4,475
R0190	Derivatives	
R0200	Deposits other than cash equivalents	0
R0210	Other investments	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	0
R0240	Loans on policies	0
R0250	Loans and mortgages to individuals	
R0260	Other loans and mortgages	
R0270	Reinsurance recoverables from:	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 index-linked and unit-linked	0
R0320	Health similar to life	
R0330	Life excluding health and index-linked and unit-linked	
R0340	Life index-linked and unit-linked	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	420
R0370	Reinsurance receivables	
R0380	Receivables (trade, not insurance)	
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	444
R0420	Any other assets, not elsewhere shown	-33
R0500	Total assets	6,468

# S.02.01.02

# **Balance sheet**

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions - non-life	444
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)	444
R0570	TP calculated as a whole	0
R0580	Best Estimate	370
R0590	Risk margin	74
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	
R0630	Best Estimate	
R0640	Risk margin	
R0650	Technical provisions - life (excluding health and index-linked and unit-linked)	0
R0660	TP calculated as a whole	
R0670	Best Estimate	
R0680	Risk margin	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	TP calculated as a whole	
R0710	Best Estimate	
R0720	Risk margin	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	0
	Derivatives	
	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	13
R0830	Reinsurance payables	
R0840	Payables (trade, not insurance)	317
R0850	Subordinated liabilities	0
R0860	Subordinated liabilities not in BOF	
R0870	Subordinated liabilities in BOF	0
R0880	Any other liabilities, not elsewhere shown	197
R0900	Total liabilities	971
110700	ו טעענ נועאוונונים	9/1
R1000	Excess of assets over liabilities	5,498

S.05.01.02
Premiums, claims and expenses by line of business

#### Non-life

Premiums written
R0110 Gross - Direct Business

Premiums earned
R0210 Gross - Direct Business

Claims incurred
R0310 Gross - Direct Business

R0140 Reinsurers' share R0200 Net

R0240 Reinsurers' share R0300 Net

R0340 Reinsurers' share R0400 Net

R0440 Reinsurers' share R0500 Net

R0550 Expenses incurred R1200 Other expenses R1300 Total expenses

R0410 Gross - Direct Business

R0120 Gross - Proportional reinsurance accepted
R0130 Gross - Non-proportional reinsurance accepted

R0220 Gross - Proportional reinsurance accepted
R0230 Gross - Non-proportional reinsurance accepted

R0320 Gross - Proportional reinsurance accepted
R0330 Gross - Non-proportional reinsurance accepted

Changes in other technical provisions

R0420 Gross - Proportional reinsurance accepted
R0430 Gross - Non-proportional reinsurance accepted

	portional	cepted non-propurance		Line of b	Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)											
Total	Property	Marine, aviation and transport	Casualty	Health	Misc. financial loss	Assistance	Legal expenses insurance	Credit and suretyship insurance	General liability insurance	Fire and other damage to property insurance	Marine, aviation and transport insurance	Other motor insurance	Motor vehicle liability insurance	Workers' compensation insurance	Income protection insurance	Medical expense insurance
C0200	C0160	C0150	C0140	C0130	C0120	C0110	C0100	C0090	C0080	C0070	C0060	C0050	C0040	C0030	C0020	C0010
6,61																6,618
6,61																6,618
								I			I			I	I	
6,61																6,618
6,61																6,618
								1						1		
5,08																5,082
5,08																5,082
								1							1	
																0
			I		1			I			I			<u> </u>	I	4 500
1,58																1,589
12 1,71																
1,71																

S.05.02.01

# Premiums, claims and expenses by country

# Non-life

		C0010	C0020	C0030	C0040	C0050	C0060	C0070
		Home Country		y amount of gross pr non-life obligations	Top 5 countries (b premiums writ obliga	Total Top 5 and home country		
R0010								nome country
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
	Premiums written							
R0110	Gross - Direct Business	6,618						6,618
R0120	Gross - Proportional reinsurance accepted							0
R0130	Gross - Non-proportional reinsurance accepted							0
R0140	Reinsurers' share							0
R0200	Net	6,618	0	0	0	0	0	6,618
	Premiums earned							
R0210	Gross - Direct Business	6,618						6,618
R0220	Gross - Proportional reinsurance accepted							0
R0230	Gross - Non-proportional reinsurance accepted							0
R0240	Reinsurers' share							0
R0300	Net	6,618	0	0	0	0	0	6,618
	Claims incurred							
R0310	Gross - Direct Business	5,082						5,082
R0320	Gross - Proportional reinsurance accepted							0
R0330	Gross - Non-proportional reinsurance accepted							0
R0340	Reinsurers' share							0
R0400	Net	5,082	0	0	0	0	0	5,082
	Changes in other technical provisions							
R0410	Gross - Direct Business							0
R0420	Gross - Proportional reinsurance accepted							0
R0430	Gross - Non-proportional reinsurance accepted							0
R0440	Reinsurers' share							0
R0500	Net	0	0	0	0	0	0	0
R0550	Expenses incurred	1,589						1,589
R1200	Other expenses							129
R1300	Total expenses							1,718

	Direct business and accepted proportional reinsurance													Accepted non-proportional reinsurance			
	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non- proportional health reinsurance	Non- proportional casualty reinsurance	Non- proportional marine, aviation and transport reinsurance	Non- proportional property reinsurance	Total Non-Life obligation
	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
R0010 Technical provisions calculated as a whole	0																0
Total Recoverables from reinsurance/SPV and Finite Re after the R0050 adjustment for expected losses due to counterparty default associated to TP calculated as a whole																	0
Technical provisions calculated as a sum of BE and RM Best estimate Premium provisions																	
R0060 Gross	287																287
Total recoverable from reinsurance/SPV and Finite R0140 Re after the adjustment for expected losses due to counterparty default																	0
R0150 Net Best Estimate of Premium Provisions	287																287
Claims provisions  R0160 Gross Total recoverable from reinsurance/SPV and Finite R0240 Re after the adjustment for expected losses due to	83																83
counterparty default R0250 Net Best Estimate of Claims Provisions	83																83
R0260 Total best estimate - gross	370																370
R0270 Total best estimate - net	370																370
R0280 Risk margin	74																74
Amount of the transitional on Technical Provisions  R0290 Technical Provisions calculated as a whole  R0300 Best estimate																	0
R0310 Risk margin																	0
R0320 Technical provisions - total	444																444
Recoverable from reinsurance contract/SPV and R0330 Finite Re after the adjustment for expected losses due to counterparty default - total	0																0
R0340 Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	444																444

S.19.01.21 Non-Life insurance claims

#### **Total Non-life business**

Z0020 Accident year / underwriting year Accident Year

ſ	Gross Claims	Paid (non-cun	nulative)											
	(absolute am	ount)												
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
	Year	C0010	C0020	C0030	C0040	Developm		C0070	C0000	C0070	C0100	COTTO	In Current	Sum of years
	rear	0	1	2	3	4	5	6	7	8	9	10 & +	year	(cumulative)
R0100	Prior		·						•			0	0	0
R0160	2009	5,451	169	0	0	0	0	0	0	0	0		0	5,619
R0170	2010	5,102	158	0	0	0	0	0	0	0			0	5,260
R0180	2011	5,034	156	0	0	0	0	0	0				0	5,190
R0190	2012	4,953	153	0	0	0	0	0					0	5,106
R0200	2013	5,036	156	0	0	0	0						0	5,192
R0210	2014	5,074	79	0	0	0							0	5,152
R0220	2015	5,153	157	0	0								0	5,309
R0230	2016	4,997	137	0									0	5,134
R0240	2017	4,944	153										153	5,097
R0250	2018	5,024											5,024	5,024
R0260												Total	5,177	52,084

Ī	Gross Undisc	counted Best E	stimate Clair	ns Provisions									
	(absolute am	iount)											C0360
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	Year end
	Year					Developn	nent year						(discounted
		0	1	2	3	4	5	6	7	8	9	10 & +	data)
R0100	Prior											0	0
R0160	2009	0	0	0	0	0	0	0	0	0	0		0
R0170	2010	0	0	0	0	0	0	0	0	0			0
R0180	2011	0	0	0	0	0	0	0	0				0
R0190	2012	0	0	0	0	0	0	0					0
R0200	2013	0	0	0	0	0	0						0
R0210	2014	0	0	0	0	0							0
R0220	2015	0	0	0	0								0
R0230	2016	159	0	0									0
R0240	2017	158	0										0
R0250	2018	83											83
R0260												Total	83

#### S.23.01.01

#### Own Funds

R0780 Expected profits included in future premiums (EPIFP) - Non- life business
R0790 Total Expected profits included in future premiums (EPIFP)

	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)
R0030	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings
R0050	Subordinated mutual member accounts
R0070	Surplus funds
R0090	Preference shares
R0110	Share premium account related to preference shares
R0130	Reconciliation reserve
R0140	Subordinated liabilities
R0160	An amount equal to the value of net deferred tax assets
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above
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
R0230	Deductions for participations in financial and credit institutions
R0290	Total basic own funds after deductions
	Ancillary own funds
R0300	Unpaid and uncalled ordinary share capital callable on demand
	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand
	Unpaid and uncalled preference shares callable on demand
	A legally binding commitment to subscribe and pay for subordinated liabilities on demand
	Letters of credit and guarantees 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
R0370	
R0390	Other ancillary own funds  Total ancillary own funds
110-100	
POSOO	Available and eligible own funds  Total available own funds to meet the SCR
	Total available own funds to meet the MCR
	Total eligible own funds to meet the SCR
	Total eligible own funds to meet the MCR
R0580	SCR
R0600	
R0620	Ratio of Eligible own funds to SCR
R0640	Ratio of Eligible own funds to MCR
	Reconcilliation reserve
R0700	Excess of assets over liabilities
R0710	Own shares (held directly and indirectly)
	Foreseeable dividends, distributions and charges
	Other basic own fund items
	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds
R0760	Reconciliation reserve
D0770	Expected profits  Financial and the desired and the feature and the control of th
	Expected profits included in future premiums (EPIFP) - Life business

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
0	0		0	
0	0		0	
0	0		0	
0		0	0	0
0	0			
0		0	0	0
0		0	0	0
5,498	5,498			
0		0	0	0
0				0
0	0	0	0	0
0				
0	0	0	0	
5,498	5,498	0	0	0
0				
0				
0				
0				
0				
0				
0				
0				
0				
0			0	0

	5,498	5,498	0	0	0
	5,498	5,498	0	0	
ľ	5,498	5,498	0	0	0
ľ	5,498	5,498	0	0	

1,96
2,22
280.389
247.43

C0060
5,498
0
0
0
5,498

-	8
-	8

# S.25.01.21

# Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	1,133		
R0020	Counterparty default risk	140		
R0030	Life underwriting risk	0		
R0040	Health underwriting risk	1,032		
R0050	Non-life underwriting risk	0		
R0060	Diversification	-543		
			USP Key	
R0070	Intangible asset risk	0	For life underwriti	ng risk:
R0100	Basic Solvency Capital Requirement	1,762	1 - Increase in the a benefits 9 - None	amount of annuity
	Calculation of Solvency Capital Requirement	C0100	For health underw 1 - Increase in the a	3
R0130	Operational risk	199	benefits	ŕ
R0140	Loss-absorbing capacity of technical provisions	0	2 - Standard deviat premium risk	ion for NSLT nealth
R0150	Loss-absorbing capacity of deferred taxes	0	3 - Standard deviat premium risk	ion for NSLT health gross
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0	4 - Adjustment fact	or for non-proportional
R0200	Solvency Capital Requirement excluding capital add-on	1,961	reinsurance 5 - Standard deviat	ion for NSLT health
R0210	Capital add-ons already set	0	reserve risk	
R0220	Solvency capital requirement	1,961	9 - None	
	Other information on SCR		reinsurance	or for non-proportional
R0400	Capital requirement for duration-based equity risk sub-module	0	6 - Standard deviat premium risk	ion for non-life
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	0	7 - Standard deviat	ion for non-life gross
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0	premium risk 8 - Standard deviat	ion for non-life
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0	reserve risk	
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0	9 - None	

Gross solvency capital

#### S.28.01.01

# Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

	Linear formula component for non-life insurance and reinsurance obligations	C0010		
R0010	MCR <sub>NL</sub> Result	328		
			Net (of	
			reinsurance/SPV) best	Net (of reinsurance)
			estimate and TP	written premiums in the last 12 months
			calculated as a whole	the last 12 months
			C0020	C0030
R0020	Medical expense insurance and proportional reinsurance		370	6,618
R0030	Income protection insurance and proportional reinsurance		0	
R0040	Workers' compensation insurance and proportional reinsurance		0	
R0050	Motor vehicle liability insurance and proportional reinsurance		0	
R0060	Other motor insurance and proportional reinsurance		0	
R0070	Marine, aviation and transport insurance and proportional reinsurance		0	
R0080	Fire and other damage to property insurance and proportional reinsurance		0	
R0090	General liability insurance and proportional reinsurance		0	
R0100	Credit and suretyship insurance and proportional reinsurance		0	
R0110	Legal expenses insurance and proportional reinsurance		0	
R0120	Assistance and proportional reinsurance		0	
R0130	Miscellaneous financial loss insurance and proportional reinsurance		0	
R0140	Non-proportional health reinsurance		0	
R0150	Non-proportional casualty reinsurance		0	
R0160	Non-proportional marine, aviation and transport reinsurance		0	
R0170	Non-proportional property reinsurance		0	
	Linear formula component for life insurance and reinsurance obligations	C0040		
R0200	MCR <sub>L</sub> Result	0		
			Net (of	
			reinsurance/SPV) best	Net (of
			estimate and TP	reinsurance/SPV) total
			calculated as a whole	capital at risk
			C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits			
R0220	Obligations with profit participation - future discretionary benefits			
R0230	Index-linked and unit-linked insurance obligations			
R0240	Other life (re)insurance and health (re)insurance obligations			
R0250	Total capital at risk for all life (re)insurance obligations			
	Overall MCR calculation	C0070		
R0300	Linear MCR	328		
R0310	SCR	1,961		
R0320	MCR cap	882		
R0330	MCR floor	490		
R0340	Combined MCR	490		
R0350	Absolute floor of the MCR	2,222		
DU400	Minimum Capital Poquiroment	2,222		
R0400	Minimum Capital Requirement	Δ,ΔΔΔ		