



THE
GRIFFIN
INSURANCE ASSOCIATION

SOLVENCY AND FINANCIAL CONDITION REPORT

Year Ended 30 September 2020

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Directors responsibility statement

We acknowledge our responsibility for preparing the Association's Solvency and Financial Condition Report in all material respects in accordance with the PRA Rules and the Solvency II Regulations.

We are satisfied that:

- throughout the financial year in question, the Association has complied in all material respects with the applicable requirements of the PRA Rules and the Solvency II Regulations; and
- it is reasonable to believe that the Association has continued to so comply subsequently and will continue to so comply in future.

For and on behalf of the Board of The Griffin Insurance Association Limited

S J Peat
Director

A P Phillips
Director

17 December 2020

A. Summary

The structure of the Solvency and Financial Condition Report (“SFCR”) follows the public disclosure requirements of Articles 290 to 303 of the Commission Delegated Regulation (EU) 2015/35 (“Solvency II regulations”).

This is the SFCR for The Griffin Insurance Association Limited (“Griffin” or “the Association”) based on the financial position as at 30 September 2020.

The report sets out different aspects of the Association’s solvency and financial condition, specifically its business and performance, system of governance, risk profile, valuation methods used for solvency purposes and its capital management practices. The Association’s financial year runs to 30 September each year and it reports its results in Sterling.

The ultimate Administrative Body that has the responsibility for all of these matters is the Board of Directors of the Association, with the help of various governance and control functions that it has put in place to monitor and manage the business.

In accordance with the Prudential Regulation Authority (“PRA”) rulebook the Association has taken the benefit of the audit exemption of the SFCR. On 17 October 2018 the PRA published Policy Statement – PS25/18 Solvency II: External audit of the public disclosure requirement. This should be read in conjunction with the Supervisory Statement SS11/16 and the External Audit Part of the PRA rulebook.

The Association’s approach to capital management and valuation for solvency purposes remains stable and this is demonstrated through its capital ratios summarised below. The capital requirements are calculated in accordance with the Solvency II standard formula which the Association has determined to be appropriate for its risk profile.

For Solvency Capital Requirement (“SCR”) purposes the total eligible own funds stood at £93.2m (2019: £98.4m). Eligible own funds cover the SCR of £24.7m (2019: £27.3m) with a capital adequacy ratio of 377.5% (2019: 359.9%). The Minimum Capital Requirement (“MCR”) is £6.2m (2019: £6.8m) leading to an MCR capital adequacy ratio of 1,510.1% (2019: 1,439.6%).

B. Business and performance

B.1. Business

The Griffin Insurance Association Limited is a mutual insurance company. The Association is registered in England and Wales as a company limited by guarantee without share capital. The Association was founded in 1988 and currently has 61 Members. As a mutual insurance company the liability of its Members is limited to the calls and premiums set by its Directors.

The Association is managed on a day-to-day basis by Tindall Riley & Co Limited (trading as Griffin Managers (“TRC” or “the Managers”)). TRC is a private company owned principally by its directors and other senior staff.

The Association is regulated by the PRA and the Financial Conduct Authority (FCA). Both the PRA and the FCA operate a risk-based approach to supervision, which places emphasis on the need for regulated firms to have in place robust risk management frameworks. The PRA is the lead supervisor for the purposes of Solvency II regulation.

Contact details for the PRA and the FCA can be found on their respective websites:

www.bankofengland.co.uk/pr

www.fca.org.uk

The Association’s external auditor is Mazars LLP, whose address is Tower Bridge House, St Katharine’s Way, London, E1W 1DD.

The Association is owned 100% by the Mutual Membership.

The Association provides professional indemnity insurance to a select group of insurance intermediaries (the Members). The Association currently underwrites all business in the United Kingdom and underwriting is carried out from the Association’s office in London.

B.2. Underwriting performance

The Association once again started the year in an exceptionally strong financial position, with capital resources well in excess of the target set by the Board. The result for the year to 30 September 2020 shows a balance on the technical account before returns of call of £9.5 million. The underwriting result for the past five years and the impact of returns of call is shown in the table below:

Table 1: Underwriting performance

	2020 £m	2019 £m	2018 £m	2017 £m	2016 £m
Balance on the technical account before return of call	9.5	6.5	3.4	17.6	13.8
Returns of call	(8.1)	(7.9)	(6.0)	(6.1)	(5.0)
Balance as reported in the Income and Expenditure Account	1.4	(1.4)	(2.6)	11.5	8.8
	%	%	%	%	%
Combined ratio (before returns of call)*	50.8	68.9	100.2	(9.8)	23.2

* The net combined ratio (before returns of call) has been calculated as the sum of claims incurred net of reinsurance and net operating expenses divided by the sum of calls and premiums less reinsurance premiums as extracted from the annual financial statements at 30 September 2020.

The continuing strength of the Association allowed the Board at its meeting in June 2020 to approve a return of call of approximately £8.1 million, the second successive year in which the return of call has

been at this level. Returns of call amounting to £33.1 million have now been made to the membership over the course of the last five financial years.

At the renewal on 1 October 2019 there was no general rate increase but as the Members declared higher commission income than projected, this resulted in an increase in the Advance Call. Furthermore, ten Members have joined the Association during the financial year while one Member terminated its membership following acquisition as further expanded on in the Market Conditions section. This resulted in calls being higher when compared with the previous year, up from £13.1 million to £14.0 million.

The return of call during the current financial year was made from two policy years, £1.6 million from 2011/12 and £6.5 million from 2012/13, and represented, respectively, 16.0% and 53.5% of the Advance Call of those policy years.

The reinsurance premiums paid by the Association were higher than the previous year at £2.2 million. This increase reflected the growth in Advance Call, to which reinsurance premiums are proportionate. There was no change in the reinsurance premium rate at renewal.

The number of claims notified to the Association in the 2019/20 policy year was lower than in the previous year at 63, although the aggregate value of claims after 12 months was considerably higher at the same stage. Significant contingency reserves have also been retained within the policy year in order to absorb any future deterioration in claims.

Claims paid in the year were £3.3 million compared with £4.3 million in 2019 and the provision for outstanding claims reduced by £0.2 million. The claims position in older policy years showed improvement, with a £9.6 million release of surplus claims provisions from those years. Overall, the level of claims incurred in the financial year was £3.1 million, down from £4.8 million in the previous year.

Net operating expenses were a little higher than in the previous year at £2.9 million. The balance on the technical account, which represents the underwriting result, was a surplus of £1.4 million compared with a deficit of £1.4 million in the previous year.

The following table shows a summary of the technical (underwriting) account for the year ended 30 September 2020 (based on UK GAAP).

Table 2: Recent underwriting performance

	£m 2020	£m 2019
Calls and premiums	14.0	13.1
Return calls	(8.1)	(7.9)
Reinsurance premiums	(2.2)	(2.1)
Investment income (LTIR* basis)	3.7	2.9
Net claims incurred	(3.1)	(4.8)
Net operating expenses	(2.9)	(2.8)
Balance on the technical account	1.4	(1.4)

The Association's market excess of loss reinsurance was renewed at 1 October 2019 with terms as expiry and one change in market participation. Over the course of the financial year reinsurers have seen a fall in investment income, large loss notifications and operational challenges, all resulting in a more risk averse approach. In particular, reinsurers have sought to protect their books from further COVID-19 losses by imposing blanket COVID-19 exclusions, or even broader Communicable Disease Exclusions, across many lines of business, including professional indemnity. This made for a challenging renewal at 1 October 2020, which was only completed after the commencement of the 2020/21 policy year.

B.3. Investment performance

In accordance with the investment policy, the investment mandate is updated on a regular basis. The asset allocation established within the mandate is principally determined to ensure that future cash flows arising from liabilities (principally claims reserves) are matched by available assets of the correct currency and duration. Effective risk management is therefore the principal driver of investment allocation.

Having established a matched portfolio, limited investment risk is accepted to achieve the best return available from the surplus assets.

Some factors that may influence future investment return are:

- Market performance: as affected by macro-economic, political or other factors
- Capital allocation and risk profile: determining the risk accepted into the portfolio
- Portfolio management: including asset allocation (both strategic and tactical)

The Association's investment portfolio experienced significant volatility during the financial year with strong investment returns seen through to the middle of February 2020. However, markets then turned negative following the uncertainty relating to Coronavirus Disease 2019 (COVID-19) and the negative impact thereof on global economic growth. Investment markets retreated through to the end of March 2020 and have since remained volatile. The Association's investment portfolio has recovered from the low point seen at the end of March 2020, to generate a positive return by 30 September 2020.

In the year ended 30 September 2020, the overall return on investments was 1.4% before investment management expenses (1.0% net of investment management expenses), equivalent to £1.3 million, compared with a long term rate of return of 3.1%. The best performing asset class was fixed interest investments, with a return of 1.0% before investment management expenses.

Table 3: Investment portfolio by asset class

Asset class	2020		2019	
	Amount (£m)	% of portfolio	Amount (£m)	% of portfolio
Equities	43.5	35%	45.4	36%
Government bonds	46.6	38%	12.1	10%
Corporate bonds	17.1	14%	22.5	18%
Cash	15.8	12%	46.1	37%
	123.0	100%	126.1	100%

Table 4: Investment return by asset class

Asset class	Total (£) 2019/20	Total (£) 2018/19
Equities	622,291	1,605,414
Government bonds	1,242,157	1,570,532
Corporate bonds	(118,594)	1,242,779
Cash	(282,237)	990,425
Investment management expenses*	(202,841)	(517,409)
	1,260,775	4,891,741

*Investment management expenses are charged to the Association on an annual basis based on the total value of investments under management.

B.4. Performance from other activities

As noted in B.1., the Association is not involved in any other activities.

B.5. Any other information

The Association considers no other information material to be disclosed.

C. System of Governance

C.1 General information on the system of governance

C.1.1. Overview

C.1.1.1. Board structure

The Board

The Board of Directors of the Association is responsible for all strategic aspects of the business of the Association. In practice, it delegates some of its authority to sub-committees and groups, and delegates responsibility for the day-to-day management of the Association to the Managers. The Managers are responsible for ensuring that appropriate information, which is adequate to enable the Board to discharge its duties and to oversee the business effectively, is provided on a timely basis. There are nevertheless a number of matters that are reserved exclusively for the Board, set out below, which are reviewed and updated at least annually.

Decisions regarding the following matters are reserved for the Board:

- policy year and call recommendations;
- rule changes;
- reinsurance;
- membership;
- risk and compliance;
- release calls;
- report and financial statements;
- appointment of Auditor;
- remuneration of Auditor, Directors and Management Fee;
- D&O insurance;
- appointment and retirement of Directors; and
- approval of critical and important outsourcing arrangements and regulated roles that are specific to the Association.

The Board meets four times a year and comprises an independent non-executive chairman, up to twelve non-executive directors drawn from its broker Members, and two executive directors nominated by the Managers.

The Board's Terms of reference are reviewed and updated at least annually.

The Committee

Each Member Firm is entitled to nominate one of its partners or directors to sit on the Association's Committee. Members of the Committee meet twice each year, in February and July. All non-executive directors of the Association are also members of the Committee. Firms represented on the Association's Board are entitled to nominate a second Committee Representative should they wish to do so. The Committee does not carry out any regulated functions.

Sub-Committees of the Board

There are five sub-committees of the Board: the Audit Group, the Remuneration Group, Nomination Sub-Committee, the Investment Strategy Group and the Future Strategy Group.

Audit Group

The Audit Group comprises four non-executive directors of the Association (not being directors nominated by the Managers), one of whom is the Chairman of the Association 'ex officio'. The duties of the Audit Group are to review and advise the Board in relation to the report and financial statements, the Solvency and Financial Condition Report to the Prudential Regulation Authority, internal and external audit, and the robustness of internal financial systems and controls. The Audit Group meets

at least three times a year and receives regular reports from the Managers, and from the Association's internal and external auditors.

Remuneration Group

The Remuneration Group comprises of the Chairman of the Association and at least one other non-executive director of the Association (not being directors nominated by the Managers). The Remuneration Group meets annually to review proposals put forward in relation to the fee paid to the Managers and the remuneration paid to non-executive directors, and to agree the recommendations to be put to the Board for approval.

Nomination Sub-Committee

The Nomination Sub-Committee comprises the Chairman of the Association 'ex officio', two other non-executive directors of the Association and one of the directors nominated by the Managers. The Nomination Sub-Committee is responsible for reviewing and making recommendations to the Board in relation to suitable candidates for appointment or re-appointment as directors of the Association, candidates for appointment to regulatory roles and the appointment and re-appointment of the Chairman of the Association. The Sub-Committee also monitors the overall performance and collective skills of the Board and its sub-committees. The Nomination Sub-Committee meets at least annually.

Investment Strategy Group

The Investment Strategy Group meets at least once a year to review the Association's overall strategic asset allocation, the performance of the Association's investments against an agreed benchmark, and the performance and remuneration of Association's fiduciary investment managers.

Future Strategy Group

The Future Strategy Group meets annually to review the Association's strategic objectives and to monitor the implementation of the wider strategy agreed by the Board. The wider strategy of the Association is reviewed by the Group annually, or as considered necessary.

The Association's Board and sub-committee structure is supported by the effective distribution of responsibilities across holders of Senior Management Functions (SMFs) and other Certification Functions (CFs). The Association's integrated responsibility and corporate governance model is recorded in its Management Responsibilities Map.

The Association's governance map and organisational chart provide a pictorial representation of the information described above (see **Appendix A**).

C.1.1.2. Key functions

The Managers

The Association has no direct employees and as such the Board relies on the Managers for day-to-day management duties. In accordance with the rules in the Conditions Governing Business part of the PRA Rulebook and the Solvency II Directive, the following business functions have been designated as Key Functions: Compliance, Risk Management, Internal Audit and Actuarial. All of these functions are provided by the Managers.

Compliance function

The Compliance function is responsible for:

- identifying, assessing, monitoring and reporting on the Association's regulatory risk exposures;
- assessing the possible impact of legislative change and conducting assurance activity to monitor the appropriateness of compliance procedures against market good practice; and
- assisting, supporting and advising the Association in fulfilling its responsibilities to manage compliance risks.

The Chief Risk Officer (CRO) is responsible for day-to-day monitoring of, and reporting to the Board on, all compliance related matters.

Risk Management function

The risk management function is responsible for:

- setting the overall risk management and strategic framework;
- identifying, managing, monitoring and reporting on current and emerging risks; and
- monitoring and assisting in the effective operation of the Association's risk-management framework and maintaining an accurate view of the Association's risk profile.

The CRO manages the day-to-day risk monitoring of, and reports to the Board on, all aspects of risk management.

Internal Audit function

The Association's internal audit function operates a risk-based internal audit cycle to provide assurance over the appropriateness, operation and effectiveness of the system of governance including the internal control system.

Internal Audit's remit covers review of the Association's processes and controls, how these are being adhered to and implemented by all business areas and the timing and frequency of management reporting. Corporate governance is also subject to an annual review by internal audit.

The Internal Audit function reports findings and recommendations, deadlines for and progress with completion and assigned action owners, to the Audit Group.

Actuarial function

The Association has an in-house actuarial team which carries out the day-to-day actuarial activity, including claims reserving and maintenance of the Association's internal models. The Chief Actuary reports to the Board and the Audit Group on technical provisions, reinsurance and underwriting policy, and also contributes to the risk management function.

Segregation of responsibilities

All the designated key functions are provided with the necessary authority, resource and independence that they require to effectively fulfil their roles. They each report to the Association's Board either directly or through designated Board sub-committees. Their reports are standing items on the Board and sub-committees' agendas.

The Investment Managers

Investment of the Association's funds is conducted by the Investment Managers in accordance with the Board's Investment Policy and is subject to internal compliance procedures.

C.1.2. Material changes to the system of governance

There have been no material changes to the system of governance during the reporting period.

C.1.3. Remuneration

The Association has a Remuneration Policy which sets out the principles and procedures under which the Remuneration Group operates.

The Association's key functions and services, with the exception of those provided by the non-executive directors, are provided by the Managers.

The Association's Remuneration Group agrees the fee in accordance with the provisions of the Management Agreement. The fee is paid on a quarterly basis and no element of it is variable by reference to the Association's financial performance. TRC received £3,915,000 (2019 - £3,960,000) in respect of management fees and risk management services.

The Association's Chairman receives a fixed fee paid monthly in arrears. Other non-executive directors (except for the two Manager directors) receive an annual fee, with the non-executive directors who serve on any of the sub-committees receiving additional fees to reflect their additional responsibilities. These fees are paid in arrears at the end of each financial year. The level of remuneration is considered annually by the Remuneration Group, which makes recommendations to the Board. The two Manager directors receive no remuneration directly from the Association but are remunerated by the Managers.

No remuneration paid by the Association to its non-executive directors is based on the performance of the Association. The non-executive directors of the Association received remuneration of £95,850 (2019 - £90,477) for services rendered to the Association during the year. There have been no material changes to the remuneration policy compared to the prior year.

C.1.4. Related party transactions

The Board, comprising up to 12 representatives of the membership of the Association and two Manager nominees, is appointed to oversee the management of the Association on behalf of the Members. However, because of the mutual nature of the Association, all Members, being both insurer and insured, are in effect related parties.

The Association, which is limited by guarantee, has no share capital and is controlled by the Members, who are also its insureds. All Members enter into insurance contracts negotiated with the Association's managers on arm's length terms. These transactions are therefore with related parties and are the only transactions between the Association and its Members.

The Association's reinsurance programme is placed by a Member of the Association and the Member earned reinsurance commission of £200,000 (2019 - £200,000) for placing the programme.

C.2. Fit and proper requirements

The Association has well established procedures in place to ensure that all Certification Function holders remain fit and proper to carry out their duties and to discharge their responsibilities. In particular these individuals must:

- meet the requirements of the Managers' 'fit and proper' test and ethics policy;
- be capable of meeting their Prescribed Responsibilities; and
- report anything that could affect their ongoing suitability.

When considering an individual's fitness and propriety the following factors are considered:

- their competence and capability;
- their integrity and reputation; and
- their financial soundness.

When assessing an individual's competence and capability to take on a Certification Function role, all relevant matters are considered prior to their appointment. These include a review and assessment of:

- the competencies and capabilities required to fulfil the intended role. This is assessed throughout the recruitment process, particularly through interviews and using a Skills Matrix;
- the experience of the candidate and any additional training required; and
- whether the candidate's reputation would suit the role for which they are being considered, bearing in mind the factors set out within the FCA Handbook section 2.1.3 on fitness and propriety.

Fitness and propriety checks are made before an individual is appointed to carry out a Certification Function and periodically thereafter. These include:

- with the consent of the candidate, the completion of civil and criminal record checks through the use of a third-party provider;
- checking the veracity of any professional or other qualifications that are relevant to the role being applied for;
- obtaining references from the candidate's former employers; and
- consideration of any disclosures made by candidates (full supporting documentation will also be requested).

In determining a candidate's financial soundness, the following factors will be taken into account:

- any judgment debt or award in the United Kingdom or elsewhere;
- whether this remains outstanding or was not satisfied within a reasonable period; and
- whether the individual has made any arrangements with creditors, filed for bankruptcy, had a bankruptcy petition served on them, been the subject of a bankruptcy restriction order or any other related matter.

Prior to consideration for appointment, all directors of the Association complete a self-assessment of their skills, experience and capabilities relative to the responsibilities assigned to them under the new role. The results, which are added to the Skills Matrix maintained for all Directors, are reviewed by the CRO, discussed as necessary with the individuals concerned and fed into individual training and further recruitment plans.

Refer to **Appendix A** for a listing of the persons of the Association that are responsible for the key functions.

C.3. Risk management system

The oversight of risk and the underlying corporate culture is fundamental to the future operations and success of the Association. It is an integral part of this approach that each individual is aware of the Association's aims and objectives and how they are achieved. The Board of the Association has a clear responsibility to understand the risk management activities of executive management.

It is a primary function of the Association Board and senior management to establish the Association's risk appetite and tolerances and to put in place the philosophy, structures, tools and methods to drive the risk management approach throughout the Association. It is vital in the discharge of its governance responsibilities that the Board understands inherent risks and the way these are measured, monitored, assessed and mitigated by management.

The Audit Group has delegated responsibilities from the Board to oversee the Internal Control Framework including the oversight of Internal Audit, External Audit and Financial Reporting.

All individuals involved with business operations that allow the Association to manage risk, including control owners, are expected to be aware of the Association's approach to risk management. This is also the expectation of regulators and so those individuals that lead risk assessments or manage material controls or outsourced activities are considered by the Association to be certification functions (roles that could cause significant harm) and are consequently subject to enhanced due diligence by the Managers.

Key Risks and Mitigants

The key risks faced by the Association and the associated mitigants will be as follows:

Underwriting Risk

Underwriting risk which arises from two sources – adverse claims development (reserve risk) and inappropriate underwriting (premium risk). Reserve risk is managed by the Association's policy of setting prudent reserves for individual claims (evidenced by the release of redundant reserves shown in the financial statements) and frequent reviews of estimates, including oversight of large claims by

senior claims directors. Prudent incurred but not enough reported (IBNER) reserves are also maintained at confidence levels consistent with the Associations risk appetite.

Premium risk is managed by having in place a clear underwriting philosophy, procedures and controls in relation to pricing, rigorous selection criteria for the admission of new Members and diversification of risks. Reinsurance is also used to mitigate underwriting risk. Reinsurance may also be used in respect of certain risks where additional protection is deemed appropriate.

Market Risk

Market risk refers to the risk of losses on the Association's investment portfolio arising from fluctuations in the market value of the underlying investments. There is a clear investment strategy which is subject to regular review. The principal objectives are to match investments with the claims liabilities in terms of duration, to hold a diversified portfolio of investment types with high quality fixed interest government securities and hold appropriate levels of corporate bonds and equities and, within that overall context, to maximise the return generated at an agreed level of risk.

Credit Risk

Credit risk arises from the possibility of default by one or more counter-parties which may include, reinsurers, deposit takers and Members. This risk is managed by undertaking appropriate due diligence on prospective counterparties. This may include carrying out financial checks on prospective Members, looking at credit ratings for reinsurers and monitoring these over time, restricting exposure to individual deposit takers and operating a robust credit control regime.

Operational Risk

Operational risk covers the risks arising from the failure of internal processes, people or systems or from external events. A comprehensive Procedures Manual covers every aspect of management of the Association.

Risk Management Framework

The risk management framework helps the Board deliver the Association's strategic objectives; it is managed by the Risk function and overseen by the Association's Board.

The Risk function is responsible for:

- identifying, managing, monitoring and reporting on current and emerging risks;
- setting the overall risk management and strategic framework; and
- monitoring and assisting in the effective operation of the Association's risk management framework and maintaining an accurate view of the Association's risk profile.

The Association's risk management policy sets out how the risk management framework supports the principles and characteristics of the Association when managing its strategic objectives, risk appetite and capital needs along with the necessary supporting culture. The policy also sets out how operational elements are devolved to the Managers while oversight is retained by the Directors.

The Association exists to benefit its Members which requires maintenance of financial strength to ensure that claims can be met in extreme circumstances and that unbudgeted Calls are not required. The Association needs to be measured when taking, managing and monitoring risks that pose a threat to its longevity, strategic objectives and capital position.

It is important that the Association's risk management framework considers:

- the wider risks to its Members business model as well as the more traditional risk management considerations expected from insurers under Solvency II;
- a proportionate approach to risk management that is reflective of the nature, scale and complexity of the Association's operations, especially considering the monoline nature of its business; and
- transparency and accountability between the Association and the Managers.

This policy sets out a number of standards that help the Association achieve these targeted outcomes:

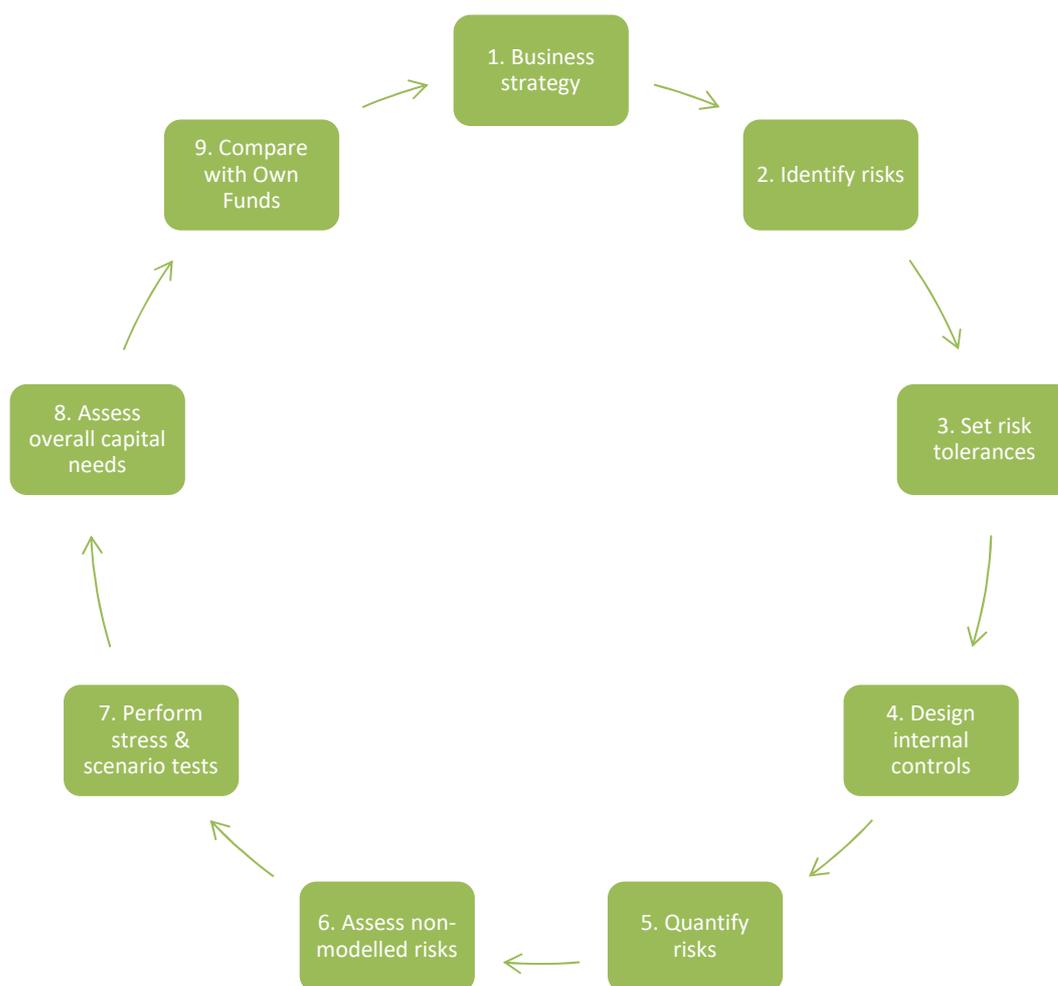
- **Identify** - Maintain a risk register of all significant risks to the Association aligned with one of the available risk categories and the “material” / “important” controls that are used to manage these risks. Ensure completeness of the risk universe and the controls environment, regularly back testing against results and reviewing risk incidents. The main management tool used by the Association to assist in assessing the systems and controls is a comprehensive risk register.
- **Assess** - Assess the impact of all risks in the Risk Register at the 1-in-10 and 1-in-200 confidence level using a score of 1 - 5. Assess the effectiveness of the controls supporting risks (through self-attestation).
- **Monitor** - Measure the current risk exposure against the Board's risk appetite as set out in the Risk Appetite Statements and as devolved into Risk Limits, Key Control and Key Risk Indicators.
- **Respond** - Where there are instances of risk taking outside the Board's expectations (outside risk appetite), ensure Board approved remediation actions are executed in a timely manner.
- **Report** - Report exceptions to the Board where the risk profile is outside the Board's Risk appetite or material controls are not operating in line with expectation. The reporting should also consider risk incidents, emerging risks and updates on remediation actions. At least annually, prepare an Own Risk and Solvency Assessment (ORSA) report, summarising the results of all risk management activities (ORSA process).
- **Risk Incidents** - Capture all risk incidents (unexpected events that cause, or nearly cause, a financial or reputational impact due to a failed control or unforeseen exposure) and update the processes and control environment in order to avoid repetition.
- **Emerging risks** - Be forward looking in our risk identification and consider risks that may emerge for the business due to internal or external change.

C.4. Own Risk and Solvency Assessment (ORSA)

The ORSA is carried out in accordance with the Association's ORSA Policy (“the Policy”). The Policy sets out required standards and guidance for conducting the ORSA process and reporting to ensure all relevant regulatory and business requirements are continuously met. The purpose of the Policy is to assist the Board in implementing consistent processes to demonstrate the link between business strategy, risk appetite, risk profile and solvency needs. The Policy is reviewed and approved annually by the Board.

The ORSA process, which incorporates the risk monitoring and reporting activities performed by the Association's Key Control Functions, operates continuously throughout the year as part of day-to-day business operations. Outcomes of the process and conclusions drawn are recorded in an annual report presented to and signed off by the Board. Key steps within the ORSA process are set out in Chart 1 below.

Chart 1: Summary of ORSA process



From a strategic perspective, the annual ORSA report provides the Board with a comprehensive assessment of the capital required to meet the Association’s strategic objectives over the next three years, based on its projected business plan and the risk profile this generates. From an operational point of view, ORSA processes and results are used to inform and support the Board when making key decisions, for example on calls on Members, returns of call, pricing, reinsurance purchase and investment strategy.

The 2020 ORSA includes an assessment of both the economic and regulatory capital position of the business projected to 30 September 2020 and for the next three years by reference to the Economic Capital Benchmark (“ECB”), SCR and MCR.

The ECB defines the amount of capital that must be held to implement the business strategy for the next three years to cover the risk of losses from all potential sources that exceed risk appetite up to the 99.5th level of confidence.

The SCR defines the amount of capital that the Association must hold to satisfy regulatory requirements. The benchmark set for the SCR is also at the 99.5th level of confidence, but measured over a one-year period.

The MCR, which represents the absolute minimum level of capital that the Association must hold to avoid regulatory action, is also measured over a one-year period but reflects the 85th level of confidence.

The Association has used the Solvency II Standard Formula to calculate its SCR and MCR.

The annual ORSA report is reviewed by the Board to ensure that it is accurate and provides the necessary information for capital allocation and strategic planning purposes. Once the Board is satisfied, it approves the report which is then submitted to the PRA.

The ORSA report is produced annually, which is consistent with the stable nature of the Association's capital needs over time. The ORSA may be undertaken more frequently if specific triggers occur which are set out in the Policy. However, none of these events has occurred since the last ORSA was prepared.

C.5. Internal control system

The Association's internal control system refers to a combination of activities carried out to eliminate or reduce the likelihood of risks materialising that are beyond the level of risk appetite considered within business plans and strategy.

Activities include:

- control management undertaken by the business, including half-yearly control attestations provided to the CRO as part of the risk register update. Each identified control owner attests to the performance and effectiveness of their control environment over the previous six months. The CRO reports the results and any associated recommendations every six months to the meetings of Griffin Managers and to the Board at the corresponding meeting;
- annual review and re-assessment of the Association's key risks by relevant risk owners, independently challenged by the CRO and reported to Griffin Managers half-yearly and to the Board;
- annual stress and scenario testing (including reverses stress tests) of the assumptions within the business plan to determine the financial, reputational, operational and capital impact of extreme adverse events. An agreed set of tests relevant to the Association's business plan and strategy are run by relevant members of the Finance and Actuarial Functions, reported to the CRO and included within the annual ORSA report;
- annual independent validation of capital calculations, including underlying assumptions and associated projections both within the Actuarial team and by the Chief Actuary;
- annual review and assessment of the effectiveness of the Association's risk management framework by the CRO;
- regulatory guidance, 'horizon scanning', recording and quarterly reporting of operational losses (actual, potential and near misses) and compliance breaches to the Board;
- half-yearly compliance monitoring and reporting to Griffin Managers and the Board; and
- independent assurance reviews conducted by Internal Audit.

Where control deficiencies exist, remedial actions, the person responsible for taking them and the timeframe within which the control deficiency will be addressed, are recorded and monitored by the CRO.

The Association is required to establish and implement the compliance activities necessary to demonstrate that it meets its regulatory expectations. These activities should be proportionate to the nature, scale, risk and complexity of the business. There are seven key areas in which the Compliance Function operates:

- The compliance system must make use of the "three lines of defence" model where the:
 - 1st Line: Business roles that are primarily responsible for achieving defined regulatory outcomes;
 - 2nd Line: The Risk and Compliance function, providing an independent view on the performance against risk and compliance activities. There could be times when the Risk and Compliance team will lead on a regulatory obligations and will act as a "1st line" role, but this should be minimised;
 - 3rd Line: The Internal audit function, providing independent assurance to a Non-Executive Director via the Audit Group.
- Identify all necessary controls for the business to demonstrate compliance with the regulatory responsibilities of the Managers and the Association in a proportionate manner, in line with the nature, scale and complexity of the business.

- Establish processes to regularly review and update the areas in scope of the compliance manual and the business controls, as necessary while allowing for regional variances, to reflect any changes in the regulatory requirements, statutory requirements or changes in the nature, scale or complexity of the business activities.
- Create awareness of the business controls expected to be operated by various business teams, particularly following a change in the controls listed.
- Integrate controls within the Risk Registers for the Managers and the Association as appropriate.
- Perform on-going compliance monitoring and report findings to the senior management and the Board via the Compliance Dashboard.
- Escalate exceptions to the relevant Group, Manager's Board or the Association's Board.

The key elements of the compliance system are:

- Identifying internal (following projects) and external change (horizon scanning) to the status quo.
- Assessing the updates required from time to time to compliance activities
- Monitoring the effectiveness of the compliance activities as part of the compliance dashboard
- Responding to exceptions in a timely manner through appropriate management action.

C.6. Internal audit function

Internal Audit, provided by the Managers on behalf of the Association, provides independent assurance, advice and insight to the Board, designed to add value to the business and improve its operational effectiveness. It helps the Association to accomplish its objectives by bringing a systematic, disciplined approach to the evaluation of the effectiveness of its governance, risk management and control processes.

The Internal Audit Function is governed by written Terms of Reference, setting out the function's role, mandate, independence and authority to act. The internal audit function is responsible for preparing:

- an internal audit universe based on the risks within the Association's risk register;
- a five-year strategic internal audit plan using a risk based approach for the timing and frequency of intended reviews; and
- an annual internal audit programme taking into consideration previous audit findings or those arising from the occurrence and cause of material unexpected losses, regulatory breaches or incidents involving financial crime as well as in response to feedback from regulators and management.

The internal audit universe and the annual internal audit programme are presented at each meeting of the Audit Group.

The internal audit function and holder of the associated regulatory role for the Association under the Senior Managers Regime, reports all findings and recommendations arising from the review work performed to the Audit Group at each meeting and has regular discussions with the chairman of the Audit Group between meetings. Included within the internal audit function's reports is an update on the implementation by assigned individuals of previous recommendations. Material issues not addressed within agreed timescales are escalated to the Board.

The internal audit function has no direct operational responsibility or authority over any of the activities audited and is not permitted to implement internal controls, develop operational procedures, prepare records or engage in any other activity that may impair its judgement. The internal audit function is obligated to report to the Audit Group any interference and related implications in determining the scope of internal audit reviews, performing work and communicating results.

The internal audit function is independent from the organisational activities audited and free to exercise its assignments without impairment and on its own initiative in all areas. The internal audit function reports directly to the Chair of Audit Group.

C.7. Actuarial Function

The Association's Actuarial Function is made up of an internal actuarial team headed by a Chief Actuary employed by the Managers.

The Actuarial Function's organisation is designed to provide the Association with the necessary 'Approved Person' role and flexible actuarial support, whilst enabling the Association's Managers to maintain operational control of the work performed.

The internal actuarial team reports to the Association's CFO. The Actuarial Function has responsibilities for the calculation of the Association's reserves and Solvency II technical provisions, its capital modelling, risk pricing and for providing analytical support to underwriters.

In accordance with Article 48 of the Solvency II Directive, The Chief Actuary has four main duties:

- to assess the appropriateness and adequacy of the Association's Solvency II technical provisions;
- to provide an opinion on the underwriting policy;
- to provide an opinion on the adequacy of reinsurance arrangements; and
- to contribute to the Association's risk management.

C.8. Outsourcing

Outsourcing is the use of a third party (either an affiliated entity within the same group or an external entity) to perform activities on a continuing basis that would normally be undertaken by the Association. The third party to whom an activity is outsourced is a 'service provider'.

The Association's approach to outsourcing is governed by the principles and standards set out in its Outsourcing Policy. This Policy acts as a guide to the Managers for assessing the materiality of risks associated with outsourcing any given activity or service and the steps that must therefore be taken to mitigate and manage this risk effectively.

The Policy establishes two fundamental principles:

- that the decision to outsource activities assessed as Critical (C) or Important (I) to the Association will be reserved for the Board; and
- the control framework through which outsourcing benefits and risks are assessed, controlled and monitored will be sufficiently robust to ensure that the Association's outsourcing arrangements will give advantage in practice.

Outsourcing is categorised as C or I if it would jeopardise adherence to the regulators' Threshold Conditions, which are required for the Association to maintain its UK regulatory authorisation. The assessment of materiality determines at the outset whether the nature of the outsourced arrangement will make it C or I, after which the same stages for approval will be followed, although proportionate to the nature and materiality of the activities to be outsourced.

The starting point is to compare the potential benefits with the foreseeable risks, to see whether there is sufficient value in the proposition to go through a tender process. The scoring used in this viability check to assess whether the benefits outweigh the risk, is set out as an appendix to the Outsourcing Policy.

Once the viability check is passed, the business sponsor will arrange for specific due diligence on a number of providers before presenting a value proposition and preferred service provider to either Griffin Managers' Board or, for C and I arrangements, the Board of the Association, for consideration and approval. The necessary due diligence, minimum contractual terms and approval process to be followed are set out in various appendices to the Outsourcing Policy and designed to ensure that:

- adequate review and assessment has been carried out on the impact of the outsourcing on the Association's risk profile and contingency plans in the event of service failure by the selected provider;

- the selected service provider has the ability, capability and legal authority to meet the Association's business requirements and is free of any conflicts of interest relevant to the outsourcing;
- the service provider is financially sound, professionally competent, appropriately experienced and has adequate insurance cover to meet its contractual obligations;
- contracts between the service provider and the Association setting out the duties and responsibilities of both parties are signed-off by appropriately authorised signatories and comply with all relevant legal and regulatory requirements;
- control mechanisms established by the Managers for monitoring the performance and quality of services provided by a third party are commensurate with the nature and materiality of the risk to which they expose the Association; and
- the outsourcing does not impair the Association's systems of governance or increase the level of operational risk.

The Association's C and I outsourcing arrangements relate to:

- the appointment of its Managers; and
- the management of its investments by Schroders.

The Board bears ultimate responsibility for outsourced functions, services, or activities and related governance.

C.9. Adequacy of system of governance

The Board considers that the System of Governance is appropriate for the nature, scale and complexity of the inherent risks facing the Association.

C.10. Any other information

The Association considers no other information material to be disclosed.

D. Risk profile

The Association is focused on the identification and management of exposure to risk through its core activity as a provider of insurance services. The key areas of risk faced by the Association can be classified as follows:

- Underwriting risk – incorporating premium and reserving risk;
- Market risk – incorporating equity risk, interest rate risk, spread risk and currency rate risk;
- Counterparty default risk – being the risk that a counterparty is unable to pay amounts in full when due;
- Liquidity risk - being the risk that cash may not be available to pay obligations as they fall due;
- Operational risk – being the risk of failure of internal processes or controls; and
- Strategic risk – being the risk that strategy is poorly set, executed or is unresponsive to external developments.

The Association manages these risks through the half-yearly Risk Register update, which uses metrics to monitor risk outcomes and control effectiveness and receives attestation on less significant controls from Risk Owners. Risk outcomes are compared with the results of the Association's SCR, outcomes of stress and scenario testing, self-reported Risk Incidents and Internal Audit findings to ensure that a rounded consideration of the Association's risk profile is provided to Griffin Managers and to the Board.

The assumptions underlying the Solvency II Standard Formula SCR are considered to be a good fit with the Association's risk profile.

Table 5: Split of SCR by risk category

Key areas	2020 % of SCR	2019 % of SCR
Underwriting risk	30%	30%
Market risk	62%	62%
Credit risk	7%	7%
Operational risk	1%	1%

D.1. Underwriting risk

The Association provides Members with cover for professional indemnity risks. The Association sets a projected level of Call based on a target confidence level, such that the call and investment income will be sufficient to meet net claims incurred over the full development of the policy year. The development of claims is monitored on a quarterly basis by Griffin Managers and the Board of the Association.

Reinsurance

The establishment of the Association's reinsurance programme is driven by the Board's objective of managing risk to an acceptable level and to optimise the Association's capital position. The programme comprises excess of loss reinsurance cover from reputable reinsurers in the London Market covering various reinsurance layers between £5.0m and £30.0m.

Management of claims cost – Loss Prevention

The Association's strategy is to help its Members to prevent and avoid the occurrence of incidents while ensuring the efficient handling and management of claims when they do occur. To facilitate this strategy, the Association has established programmes to ensure high levels of claims management and to reduce claims risk. This includes an extensive loss prevention programme comprising a regular cycle of visits and reviews, where potential risk areas are identified, particularly those arising from new areas of practice, and measures are recommended for their control.

Reserving process

The Association establishes provisions for unpaid claims, both reported and unreported, and related expenses to cover its expected ultimate liability. These provisions are established through the application of actuarial techniques and assumptions and the key methods used by the Association in estimating liabilities are the chain ladder, Bornhuetter-Ferguson and stochastic bootstrap modelling methods. The results are presented to the Managers' Reserving Committee, which meets quarterly in order to review and challenge the setting of reserves. They are reviewed annually by the Audit Group. In order to minimise the risk of understating these provisions, the assumptions made and actuarial techniques employed are reviewed in detail by senior management and reserves are set to meet target confidence levels for each policy year.

The Association considers that the liability for insurance claims recognised in the statement of financial position and the Solvency II balance sheet is prudent, understanding that actual experience will differ from the expected outcome.

Sensitivity testing of Underwriting risk

The Association carries out sensitivity testing on its claims reserves. The results of sensitivity testing are set out below, showing the impact on surplus/(deficit) before tax, gross and net of reinsurance. For each sensitivity, the impact of a change in a single factor is shown, with other assumptions unchanged. The sensitivity analysis assumes that a change in loss ratio is driven by a change in claims incurred and that there are no reinsurance recoveries, and has been calculated excluding the impact of returns of call.

Table 6: Impact of an increase in loss ratio by 5 percentage points

	2020	2019
	£	£
Gross	699,809	653,585
Net of reinsurance	699,809	653,585

A 5 percent decrease in loss ratios would have an equal and opposite effect.

D.2. Market risk

Market risk is the risk of adverse financial impact as a consequence of market movements such as currency exchange rates, interest rates and equity price changes. Market risk arises due to fluctuations in both the value of assets and liabilities.

The investment strategy, which is reviewed periodically by the Investment Strategy Group, is set by the Board with the assistance of external investment consultants. The strategy reflects the risk appetite of the Association and is designed to maximise return whilst holding risk at a level deemed acceptable. The policy allows the investment managers to invest a proportion of the portfolio in assets which carry a greater risk but potentially higher return, such as equities, with the majority being held in investments such as government bonds, corporate bonds and cash.

The asset allocation of the investment portfolio is monitored by the Managers. Where an asset class exceeds its permitted range, the investment managers will be instructed to carry out a rebalancing exercise, in order to restore the allocation to the correct position.

The prudent person principle

Under the Association's investment policy, all of its investments are invested and managed in accordance with the 'prudent person principle', meaning the duties of the Investment Managers are discharged with the care, skill, prudence and diligence that a prudent person acting in a like capacity would use in the conduct of an enterprise of like character and aims. More specifically the portfolio:

- is invested in assets and instruments whose risk can properly be identified, measured, monitored, managed, controlled and reported;
- ensures the security, quality and liquidity of the portfolio as a whole;
- is appropriate to the nature, currency and duration of the Association's insurance liabilities;
- includes derivative instruments only where they contribute to a reduction of risks or efficient portfolio management; includes only a prudent level of unlisted investments and assets;
- is diversified to avoid excessive reliance on any asset, issuer or group, or geographical area.

The funds are invested by the Investment Managers in accordance with parameters set by an Investment Mandate. The Investment Mandate provides a framework to the Investment Managers for the management and stewardship of the investment assets in conformity with the business and investment objectives and sets the parameters within which the Association's assets may be invested. It is considered and approved by the Board on an annual basis and ad hoc as required and is subject to the Association's Investment Policy. The Investment Managers report to the Board at each meeting.

Currency risk

The Association is exposed to currency risk in respect of liabilities under insurance denominated in currencies other than Sterling. The most significant currencies to which the Association is exposed are Euro and US dollars. In order to manage this risk, the Association holds a proportion of its investments in each currency at a level to match expected future claim payments in those currencies.

Table 7: Impact of an increase or decrease in foreign exchange rates on surplus/(deficit) before tax and equity

	2019/20		2018/19	
	USD	Euro	USD	Euro
Foreign currency bond holdings:				
Effect of 5% increase in foreign exchange rates	181,457	326,635	310,529	294,716
Effect of 5% decrease in foreign exchange rates	(181,457)	(326,635)	(310,529)	(294,716)
Foreign currency cash holdings:				
Effect of 5% increase in foreign exchange rates	141,740	-	288,254	-
Effect of 5% decrease in foreign exchange rates	(141,740)	-	(288,254)	-

Interest rate risk

Interest rate risk is the risk that the fair value of future cashflows of a financial instrument will fluctuate because of changes in market rates. Interest rate risk arises primarily from the nature and term of investments held and is managed through the buying and selling of appropriate fixed interest securities of different durations.

The Association uses a number of sensitivity management tools to understand volatility of surpluses/deficits.

Table 8: Impact of an increase or decrease in interest rates

	2020 £	2019 £
0.5% increase in interest rates	39,241	40,156
0.5% decrease in interest rates	(39,241)	(40,156)

Equity price sensitivity analysis

The Association is exposed to price risk through its holding of equities. The exposure through equities is limited to a controlled proportion of the overall portfolio. At the year end the holding in equities was 35% (2019 - 36%) of the investment portfolio. The value of the equity holding at the year end amounted to £43.5m (2018 - £45.4)

Table 9: Impact of 5% change in investment market values from a 5% increase or decrease in underlying prices

	2020 £	2019 £
5% increase in equity price	2,173,517	2,268,218
5% decrease in equity price	(2,173,517)	(2,268,218)
5% increase in corporate bond price	855,093	1,123,239
5% decrease in corporate bond price	(855,093)	(1,123,239)
5% increase in fixed interest price	2,329,111	605,245
5% decrease in fixed interest price	(2,329,111)	(605,245)

The tables above demonstrates the effect of a change in a key assumption while other assumptions remain unchanged. It should be noted that these sensitivities are non-linear, and larger or smaller impacts should not be extrapolated or interpolated from these results. Management actions could include selling investments, changing investment portfolio allocation and taking other protective action. In addition, the financial position of the Association may vary at the time that any actual market movement occurs.

D.3. Credit risk

Credit risk refers to the risk that a counterparty will default on its contractual obligations resulting in financial loss to the Association.

The key areas where the Association is exposed to credit risk are:

- amounts recoverable under reinsurance contracts;
- amounts due from Members; and
- counterparty risk with respect to cash and investments.

Amounts recoverable on reinsurance contracts

The Association is exposed to credit risk from a counterparty failing to comply with its obligations under a contract of reinsurance.

The excess of loss reinsurance programme is placed through BMS Group Ltd, a Lloyd's broker. The Association has set selection criteria whereby each reinsurer is required to hold a credit rating of at least "A-" at the time the contract is made. The reinsurance is placed with Lloyd's and company market underwriters (A rated). This is monitored by the Board.

Amounts due from Members

Amounts due from Members represents calls owing to the Association in respect of insurance business written. The Association manages the risk of Member default through a screening process to ensure the quality of new entrants to the Association and the ability to suspend cover and outstanding claims recoveries to Members that fail to settle amounts payable. The Association's policy is that Members should have paid all outstanding calls within 30 days. Amounts written off as bad debts have been minimal over recent years. The Association has no debtor balances that are overdue.

Counterparty risk with respect to cash and investments

The average ratings of the funds are monitored by the Association's Investment Strategy Group, with assistance from Schroders. The fund credit ratings allocated by Schroders and the underlying credit ratings of the investments held within the funds are reviewed by the Group to ensure that materially all investments are at least rated at investment grade. The Group also ensures that Schroders monitors the underlying investments to limit the risk of default.

Table 10: Credit risk exposure by asset category

	2019/20 £	2018/19 £
Debt securities	107,154,426	79,934,029
Reinsurers share of technical provisions	-	-
Reinsurance debtors	-	13,869
Member and other debtors	40,122	-
Deposits with credit institutions	15,835,940	46,071,730
Cash at bank	6,058,941	4,460,823
Accrued interest	-	21,951
Total financial assets bearing credit risk	129,089,429	130,502,402

Table 11: Credit risk exposure by rating band

	2019/20 £	2018/19 £
AAA	-	-
AA	-	4,482,774
A	6,058,941	13,869
BBB+ and below	-	-
No rating	123,030,488	126,005,759
Total financial assets bearing risk	129,089,429	130,502,402

D.4. Liquidity risk

Liquidity risk is the risk that cash may not be available to pay obligations as they fall due at a reasonable cost. The Association has adopted an investment policy which requires the maintenance of significant holdings in cash funds and short-term deposits to ensure sufficient funds are available to cover anticipated liabilities and unexpected levels of demand. Short-term cash needs are monitored to ensure the most efficient investment of cash balances.

The following table provides a maturity analysis of the Association's financial assets representing the date that a contract will mature, amounts are due for payment or the asset could be realised without significant additional cost.

Table 12: Maturity bands by asset category

At 30 September 2020	Short-term assets	Within 1 year	1-2 years	2-5 years	Over 5 years	Total
	£	£	£	£	£	£
Quoted shares and variable field securities	43,470,340	-	-	-	-	43,470,340
Debt securities and other fixed income securities	63,684,087	-	-	-	-	63,684,087
Deposits with credit institutions	15,835,940	-	-	-	-	15,835,940
Direct insurance operations - Members	40,122	-	-	-	-	40,122
Cash at bank	-	-	-	-	-	-
Accrued Interest	6,058,941	-	-	-	-	6,058,941
Other debtors and prepayments	-	-	-	-	-	-
Total assets	129,089,429	-	-	-	-	129,089,429
At 30 September 2019	Short-term assets	Within 1 year	1-2 years	2-5 years	Over 5 years	Total
	£	£	£	£	£	£
Quoted shares and variable field securities	45,364,357	-	-	-	-	45,364,355
Debt securities and other fixed income securities	34,569,673	-	-	-	-	34,569,673
Deposits with credit institutions	46,071,729	-	-	-	-	46,071,730
Direct insurance operations - Members	-	-	-	-	-	-
Cash at bank	4,460,823	-	-	-	-	4,460,823
Accrued Interest	21,951	-	-	-	-	21,951
Other debtors and prepayments	13,869	-	-	-	-	13,869
Total assets	130,502,402	-	-	-	-	130,502,401

The following is an analysis of the estimated timings of net cashflows by financial liability. The timing of cashflows is based on current estimates and historic trends. The actual timings of cashflows may be different from those disclosed below, however the value of total assets are well above that of total liabilities and this would therefore not materially impact the Association.

Table 13: Maturity bands by liability category

At 30 September 2020	Short-term assets	Within 1 year	1-2 years	2-5 years	Over 5 years	Total
	£	£	£	£	£	£
Gross outstanding claims	-	3,382,790	3,805,040	18,895,366	8,085,121	34,168,316
Direct insurance operations - Members	8,131,557	-	-	-	-	8,131,557
Taxation	53,637	-	-	-	-	53,637
Other Creditors	718,754	-	-	-	-	718,754
Total liabilities	8,903,948	3,382,790	3,805,040	18,895,366	8,085,121	43,072,264
At 30 September 2019	Short-term assets	Within 1 year	1-2 years	2-5 years	Over 5 years	Total
	£	£	£	£	£	£
Gross outstanding claims	-	4,024,319	4,497,885	18,564,169	7,282,380	34,368,753
Direct insurance operations - Members	7,996,794	-	-	-	-	7,996,794
Taxation	-	-	-	-	-	-
Other Creditors	827,277	-	-	-	-	827,277
Total liabilities	8,824,071	4,024,319	4,497,885	18,564,169	7,282,380	43,192,824

Expected profit in future premiums

The Association calculates the value of expected profit in future premiums by comparing the present value of expected future cash inflows with the present value of expected future cash outflows in respect of the same business. These cashflows are evaluated in accordance with the technical provisions calculation basis requirements set out in the Solvency II Directive and Commission Delegated Regulation. As at 30 September 2020, the Association's expected profit in future premium is £80k (2019 - £0).

D.5. Operational risk

Operational risk relates to the failure of internal processes, systems or controls due to human or other error. Operational risk is tolerated, but minimised by the Managers on behalf of the Association through the application of key mitigating controls. The Association documents all key procedures and controls in a procedures manual, which is embedded into the organisation, updated on a continuous basis and is available to all staff. Compliance with the procedures and controls documented within the manual is audited on a regular basis through the internal audit function which is directed and reviewed by the Managers and the Audit Group. A staff handbook contains all key policies that have been documented. The assessment of key operational risks and associated controls is recorded in the Association's Risk Register which is updated and reported to the Board on a quarterly basis.

Operational risk is also measured through a set of risk scenarios – those scenarios used in the Association’s most recent ECB calculation relate to the following operational aspects of the strategy and business model:

- reliance on third parties;
- compliance failure;
- loss of key staff;
- underwriting;
- reinsurance;
- claims;
- business interruption;
- inaccurate management information; and
- internal or external fraud.

Operational risks relating to ‘people’ are controlled by the Managers through succession planning; staff training; having adequate professional indemnity insurance; validation of references; background checks and the segregation of duties.

Systems are controlled through data back up; Disaster Recovery design and regular testing of the Association’s Business Continuity Plan.

All key control processes are documented in the Association’s various operational policies and procedure manuals. Compliance is tested and monitored by the Association’s Compliance, Risk Management and Internal Audit functions and reported to the Board by the CRO and Internal Audit respectively.

D.6. Other material risks

The Association has not identified any other material risks that it considers necessary for disclosure.

D.7. Any other information

The Association considers no other information material to be disclosed.

E. Valuation for solvency purposes

This section provides information on the valuation of assets, technical provisions and other liabilities within the Association's SII balance sheet at 30 September 2020.

In accordance with SII valuation regulations the Association has valued its assets and liabilities at fair value. Fair value is the amount for which an asset could be exchanged or a liability settled between knowledgeable, willing parties in an arm's length transaction.

The Association applies the methodology and valuation hierarchy in accordance with Article 75 of the Level 1 Directive (or where specifically provided for by Delegated Acts):

- As the default valuation method the Company values assets and liabilities using quoted market prices in active markets for the same assets or liabilities;
- Where the use of quoted market prices in active markets for the same assets or liabilities is not possible, assets and liabilities are valued using quoted market prices in active markets for similar assets and liabilities with adjustments to reflect differences;
- Where these criteria are not met, alternative valuation methods are used.

E.1. Valuation of assets

The following table sets out the value of the Association's assets at 30 September 2020 and 2019.

Table 14: Valuation difference between assets held on a GAAP basis and SII basis

	2020			2019		
	Assets per GAAP £m	Assets per Solvency II £m	Variance £m	Assets per GAAP £m	Assets per Solvency II £m	Variance £m
Financial investments	123.0	123.0	0.0	126.0	126.0	0.0
Reinsurance recoverable	0.0	(2.6)	2.6	0.0	(2.3)	2.3
Other assets	6.1	6.1	-	4.5	4.5	-
Total Assets	129.1	126.5	2.6	130.5	128.2	2.3

In general, the valuation method of assets is aligned with the statutory accounts and so the basis of preparation aligns with the accounting policies outlined in the Association's annual Report and Financial Statements in note 1. Exceptions to these methods are outlined in the relevant sections below.

Investments

The Association's investments are valued for Solvency II purposes on the same basis as the annual financial statements, which follow UK GAAP. All of the Association's investments are traded on mainstream exchanges.

Reinsurers' share of technical provisions

In the Solvency II balance sheet, the reinsurers' share of technical provisions is valued as part of net technical provisions. These are the only differences in valuation between GAAP and Solvency II.

Other assets

The differences in the valuation between UK GAAP and Solvency II relates to the recognition of accrued interest which has been recognised for Solvency II purposes under Investments and for UK GAAP purposes under 'other assets'. All other assets are valued for Solvency II purposes on the same basis as the GAAP financial statements.

There were no changes to any of the recognition criteria or valuation methods during the year.

E.2. Technical provisions

At 30 September 2020, the Association held gross technical provisions (including risk margin), valued for Solvency II purposes, of £24.5m.

The assessment of these technical provisions is based on commonly accepted actuarial techniques applied in a consistent manner. Whilst professional judgement has been exercised in all instances, projections of future ultimate losses and loss expenses are inherently uncertain due to the random nature of claim occurrences. The accuracy of the results is dependent upon the accuracy of the underlying data and additional information supplied to the actuarial teams.

The following table shows the analysis of these provisions between best estimate and risk margin at 30 September 2020 and 2019:

Table 15: Valuation difference between technical provisions held on a GAAP basis and SII basis

	2020			2019		
	Gross £m	RI £m	Net £m	Gross £m	RI £m	Net £m
Balance per UK GAAP	34.17	-	34.17	34.37	-	34.37
Prudence Margin (GAAP to BE)	(12.91)	-	(12.91)	(16.85)	-	(16.85)
Bound but not incepted ("BBNI") business	(4.59)	(2.56)	(2.03)	(3.86)	(2.34)	(1.52)
Non-investment expenses	1.49	-	1.49	1.43	-	1.43
RI credit default	-	-	-	-	-	-
ENID	1.84	-	1.84	2.12	-	2.12
Investment expenses	0.17	-	0.17	0.37	-	0.37
Discounting	0.03	-	0.03	(0.46)	0.01	(0.47)
Balance per Solvency II before risk margin adjustment	20.20	(2.56)	22.76	17.12	(2.33)	19.45
Risk Margin	4.26	-	4.26	3.82	-	3.82
Balance per SII	24.46	(2.56)	27.02	20.94	(2.33)	23.27
Variance between SII and GAAP	9.71	2.56	7.15	13.43	2.33	11.10

Since the Solvency II technical provisions figure is a best estimate, the UK GAAP technical provisions are adjusted for the following items:

- all margins for prudence are removed
- a provision is made for events not in data (ENID) to represent a true average of future outcomes
- technical provisions are stated both gross and net of reinsurance
- BBNI
- an additional Solvency II risk margin which is intended to represent a notional market value adjustment.

The Association values technical provisions (TPs) using the methodology prescribed by the Solvency II Directive and the regulations made under the Directive.

Solvency II Technical Provisions methodology

Technical provisions (TPs) for Solvency II purposes are made up of a best estimate of claims, premiums and expense cashflows, which are then discounted. Finally, a risk margin is added. The best estimate cashflows are the amounts expected to be paid/received in the future without any margin of prudence. Each element of the TPs is described in more detail below.

Homogeneous risk groups

The Association uses one homogeneous risk group for TPs as it writes only professional indemnity cover for brokers.

Gross claims cashflows and reinsurance recoveries

Gross claims are projected to ultimate cost using standard actuarial techniques including Bornhuetter-Ferguson and chain ladder with some judgement overlaid. This judgement is important because the low volume of claims causes the data to be volatile. The key assumptions made include the initial expected loss ratio for each policy year, the credibility assigned to this loss ratio and the projected incurred development pattern.

These methods are considered appropriate given that the data includes years which are fully run off, the business written has been stable and there have been no material changes in the way claims are handled.

At the valuation date, 30 September 2020, the Association had no unearned business except for BBNI. This is because all coverage is annual, renews prior to year end and incepts on the first day of the policy year. For the purposes of Solvency II any business that is bound to be written before the beginning of the Association's financial year (i.e. from 1 October 2020) is included in the calculation of TPs. However this concept is not applicable under UK GAAP where only business that has incepted is included in the TPs at the valuation date. BBNI includes all cash in-flows as well as outflows and in the Association's case this includes advance call, acquisition and administration expenses, reinsurance premiums, projected gross claims and corresponding reinsurance recoveries. The BBNI cashflow inputs of premiums and associated expenses are obtained from the call projections; and the ultimate gross claims and reinsurance recoveries are outputs from the Association's premium risk model. This is a stochastic model which projects future gross claims by applying a statistical distribution (based on historical claims experience) to the exposure. The gross claims are then subjected to the reinsurance programme to obtain the expected reinsurance recoveries.

A percentage loading is added to both earned and BBNI business to allow for ENID, which allows for severe events to which the Association could be exposed but which are absent from the historical data. The ENID percentage loading has been calculated using the Lloyd's Approximation Method 1, which is a simple and pragmatic calculation based on the assumption that the underlying data is a good fit with the log-normal distribution. The model uses the estimated coefficient of variation from the underlying data and an estimated return period to calculate the percentage loading.

Projected cashflows are estimated by applying payment patterns to the estimates of the ultimate gross claims and recoveries. The assumed payment patterns are derived using chain ladder methodology on historical gross paid claims triangles.

Premiums

There are no further premium cashflows expected relating to prior years.

Each of the Association's policy years is coterminous with its corresponding financial year. The consequence is that a full year's worth of business is recognised as BBNI business. A provision on the Solvency II balance sheet, known as the premium provision, is thus made for future premiums, claims and expenses that relate to BBNI business. Gross and reinsurance premiums for the BBNI business are taken from the business plan.

Expenses

Acquisition and administrative expenses

There are no acquisition or administrative expenses relating to unearned business.

For BBNI business, acquisition costs and internal administrative costs are calculated as a percentage of the total operating costs from the business plan for the forthcoming policy year. The operating costs

from the business plan are set assuming a percentage increase in operating costs from 2019/20 plus some specific additional costs. The external administrative costs are consistent with the business plan.

Claims handling expenses

Allocated claims handling expenses are assumed to be included in the best estimate claims reserves and, therefore, no explicit allowance is made.

Unallocated claims handling expenses payable in future years are split between expenses paid in the 2020/21 policy year and expenses paid in subsequent years. The expenses paid in 2020/21 are calculated as an assumed percentage of the total operating costs for that year; the expenses paid beyond 2020/21 are the same as those included in the GAAP reserves. The unallocated claims handling expenses are allocated between claims and premium provisions in proportion to claims payments.

Investment management expenses

The investment management expenses are calculated as an assumed percentage of the sum of the projected and discounted TPs (excluding investment expenses) at each future valuation date. The assumed percentage is calculated as the annual investment management expenses divided by funds under management.

Discounting

Claims, premium and expense cashflows have been discounted using the weighted average yield curve based on the GBP, USD and EUR EIOPA yield curves and an assumed mix of cashflows in GBP, USD and EUR as at 30 September 2020.

Risk Margin

The method used to calculate the risk margin is to:

- calculate the SCR for the Association using the standard formula;
- project the future SCRs using different run off patterns for different elements of the SCR as follows:
 - Non-life premium risk and operational risk are combined and run off in proportion to the square root of the percentage of future gross claims cashflows.
 - Counterparty default risk is run off in proportion to the square root of the percentage of future reinsurance recovery cashflows.
- discount and sum the projected SCRs and multiply by the cost of capital.

Uncertainty associated with the value of technical provisions

The estimate of the Solvency II TPs is considered to be an assessment of future obligations. However, it remains an approximation. Factors affecting the level of uncertainty are both internal and external and the nature of these factors is such that they are difficult to quantify in both likelihood and magnitude. The issues that affect the certainty of the technical provisions include:

- The projection of numerous cashflows, including future premiums, claim payments and reinsurance recoveries on these payments. None of these will develop exactly as projected and deviations from these projections are normal and to be expected.
- The assumptions used to calculate the Premium Provision are based on the expectation of an 'average year'. Actual underwriting performance for that business may vary significantly from the assumed position at the outset.
- The yield curves used to discount future cashflows can vary from one year to the next which introduces additional balance sheet volatility that does not exist on a UK GAAP balance sheet.
- There is greater uncertainty associated with more recent policy years as these are still in an early stage of development.

- For certain elements of the technical provisions, for example ENID, very little data exists on which to base the assumptions and hence a high degree of judgement is required, which could lead to increased uncertainty in the estimates.

Data adjustments and recommendations

The Association uses various sources of data for the calculation of the Solvency II technical provisions and the Standard Formula. The majority of the data used is taken from the internal claims handling system, CLUB. A data governance framework has been put in place to ensure that the data being used is complete, accurate and appropriate. In addition to the data governance framework, a validation routine is performed throughout the technical provisions calculation which includes reconciliation tests to ensure the data is consistent and reconcilable to data used for other purposes around the business for example, the Association's year-end financial statements.

No other adjustments have been applied to the technical provisions such as the matching adjustment or volatility adjustments. Neither have any transitional arrangements been applied, for example on the risk free interest rate term structures. There were no data deficiencies for which an adjustment was necessary.

Changes since the last reporting period

There have been no other changes in the TPs methodology since the previous period.

E.3. Other liabilities

The following table sets out the value of the Association's other liabilities at 30 September 2020 and 2019.

Table 16: Valuation difference between other liabilities held on a GAAP basis and SII basis

	2020			2019		
	Liabilities per GAAP £m	Liabilities per Solvency II £m	Variance £m	Liabilities per GAAP £m	Liabilities per Solvency II £m	Variance £m
Member creditors	8.1	8.1	-	8.0	8.0	-
Other creditors	0.7	0.7	-	0.8	0.8	-
Reinsurance creditors	-	-	-	-	-	-
Total liabilities	8.8	8.8	-	8.8	8.8	-

The Association's other liabilities are recognised and valued for Solvency II purposes on the same basis as the annual financial statements, which are based on UK GAAP and there are no differences between the two.

E.4. Alternative methods of valuation

The Association does not use any alternative valuation methods.

E.5. Any other information

The Association considers no other information material to be disclosed.

F. Capital management

F.1. Own funds

The Association's Business Plan and ORSA process measure the Association's current and projected capital and solvency position over a three-year time horizon. The core capital management objective over this time horizon is for the Association to maintain Tier 1 basic own funds at a level which provides a capital buffer in excess of the higher of its SCR and its ORSA derived solvency needs.

The Association has a simple capital structure, with balance sheet reserves comprising a single item: Tier 1 capital derived from past underwriting and investment surpluses. There were no restrictions on the availability of the Association's own funds to support the SCR and MCR.

The Association's objective is to maintain its total capital resources (own funds) in line with its risk appetite statement over the insurance cycle. The Association forecasts its capital over a three-year planning horizon as part of its ORSA process.

At 30 September 2020 and 2019, the Association held the following own funds, on a Solvency II basis.

Table 16: Breakdown of total reconciliation reserve for SII

	2019/20 £m	2018/19 £m
Income and expenditure account	33.8	33.1
Investment reserve	17.2	19.2
General reserve	25.0	25.0
Reinsurance reserve	10.0	10.0
Total resources	86.0	87.3
Solvency II adjustment	7.1	11.1
Total adjusted resources	93.2	98.4

As a mutual insurer with no share capital the capital structure consists of only one type of own fund. This consists of the reconciliation reserve. The reconciliation reserve equals the total excess of assets over liabilities. This item is available to fully absorb losses both on a going concern basis and in the case of winding up. The item also satisfies the criteria in Delegated Regulation (EU) 2015/35 and therefore is included in Tier 1. There are no items that are foreseen to reduce the reconciliation reserve.

Table 17: Analysis of total SII own funds by tier

	2019/20 £m	2018/19 £m
Tier 1	93.2	98.4
Tier2	-	-
Tier 3	-	-
Eligible own funds	93.2	98.4

Analysis of significant changes during the period

The following table shows the reconciliation between UK GAAP total resources and Solvency II reconciliation reserve at 30 September 2020.

Table 18: Reconciliation of total resources per UK GAAP to reconciliation reserve per SII

	£m
Excess of assets over liabilities – UK GAAP	86.0
Asset valuation difference	(2.6)
Gross technical provisions valuation difference	9.9
Liability valuation difference	(0.2)
Excess of assets over liabilities – Solvency II	93.2

Differences between capital and reserves in the UK GAAP financial statements and the excess of assets over liabilities as calculated for SII purposes mainly stem from the revaluation of technical provisions. Liabilities arising from insurance contracts also need to be recognised at market consistent values. The value of technical provisions under SII is equal to the sum of the best estimate of the liabilities and the risk margin. To calculate the best estimate of the liabilities a deterministic approach is taken, whereas the risk margin represents the capital costs of the non-hedgeable risks included in the best estimate.

The following table shows the movement in own funds between 30 September 2019 and 30 September 2020:

Table 19: Movement in reconciliation reserve

	£m
Own funds at 30 September 2019	98.4
Increase in net technical provisions	3.5
Decrease in investments	(3.0)
Increase in other assets	1.4
Increase in other liabilities	0.1
Own funds at 30 September 2020	100.4

F.2. Solvency Capital Requirement and Minimum Capital Requirement

F.2.1. Solvency capital requirement

The following table shows an analysis of the Association's SCR split by risk modules and comparison to the previous year end.

Table 20: Analysis of SCR

Heads of risk	SCR		
	2019/20 £m	2018/19 £m	Movement £m
Underwriting risk	11.4	10.2	1.2
Market risk	17.3	21.3	(4.1)
Counterparty default risk	2.4	2.3	0.1
Operational risk	0.6	0.5	-
Aggregate SCR	31.6	34.3	(2.6)
Correlation credit	(7.0)	(7.0)	(0.0)
Aggregate SCR net of correlations	24.7	27.3	(2.7)

The Association has not used any simplified calculations as set out in Article 304 of Directive 2009/138/EC in the calculation of the SCR. The Association has not used undertaking-specific parameters in any of the risk modules described below.

The main changes in the SCR since 30 September 2019 reflect the following factors.

Underwriting risk

The SCR underwriting risk capital requirement calculation is made up of three elements, premium risk, reserve risk and catastrophe (CAT) risk. Premium risk is based on the higher of either the expected value of net premiums over the next 12 months or the value of net premiums earned over the last 12 months, whilst reserve risk is based on the valuation of net technical (claims) provisions. CAT risk is based on a prescribed scenario-based approach of one claim from a Member resulting in one full claim on the Association.

Reserve risk has increased due to an increase of approximately £3.5m net technical (claims provisions). This is due to higher claims activity and also greater underlying exposure to claims through growth with new members joining the Association.

Premium risk has also increased, again mainly due to the Association's growth in new members.

Overall, SCR underwriting risk capital has increased by £1.2m, which represents a 12% increase since last year.

Market risk

Market risk is driven by a combination of market risk drivers - interest rate risk, equity risk, currency risk, spread risk and concentration risk. The overall decrease in market risk has been driven predominantly by a decrease in currency risk with other, smaller, movements in the spread risk, equity risk and Interest rate risk.

The calculated currency risk has decreased by £7.2m since last year. Much of the investment portfolio has currency hedges in place and the calculated currency calculation appears to well reflect the exposure, in the future a deeper assessment of the underlying currency hedges may be carried out.

Spread risk has increased due to holding assets with longer durations compared to last year. Interest rate risk has also increased due to greater exposure to government and corporate bonds, longer duration and, the current low Yield Curves.

The equity risk has decreased due to slightly smaller equity investments and the symmetric adjustment, published by EIOPA as at 30 September 2020 being lower than the symmetric adjustment at the same time last year. The symmetric adjustment mechanism assumes equity prices have a mean reverting behaviour. Therefore in times of rising equity markets the symmetric adjustment mechanism will increase the capital charge and in times of falling equity indices the symmetric adjustment mechanism will reduce the capital charge. It has currently been volatile, reflecting the volatility of the markets.

There is minimal concentration risk charge. The correlation credit between the elements of market risk is largely unchanged from last year at £9.4m.

Overall, the SCR market risk capital requirement has decreased by £4.1m.

Counterparty default risk

The counterparty default risk capital requirement is largely unchanged since last year.

Operational risk

There has been a negligible increase in the operational risk charge since last year and this has been driven by the higher claims reserves.

Overall SCR movement

Overall, the SCR has decreased by £2.7m year on year, from £27.3m to £24.7m, a 10% reduction.

F.2.2. Minimum capital requirement

The MCR calculation is based on the net value of technical provisions and the expected level of retained premiums over the next 12 months. The result of the calculation is then subject to a floor and a cap, of 25% and 45% of the SCR respectively. As at 30 September 2020, the MCR continues to be set at the minimum level, i.e. equal to 25% of the SCR. The MCR as at 30 September 2020 was £6.2m, a 10% decrease of £0.7m from last year.

F.2.3 Overall capital position

The following table shows the Association's capital position in relation to the SCR and the MCR at 30 September 2020.

Table 21: Overall capital position

	SCR £m	MCR £m
Capital requirement	24.7	6.2
Own funds available	93.2	93.2
Headroom	68.5	87.0
Solvency ratio	3.8	15.1

By reference to the SCR and MCR, the Solvency II own funds substantially exceed the capital requirements. By these measures, the Association remains in a satisfactory capital position and the Board will therefore have considerable flexibility in some of the key decisions to be made over the next 12 months.

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

The Association does not use this sub-module.

F.4. Difference between standard formula and any internal model used

No internal or partial internal model has been used in the calculation of the SCR.

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

The Association has fully complied with the SCR and MCR requirements during the period under review. The calculation of the SCR and MCR is subject to supervisory assessment and may change following the review of the SCR and MCR calculation by the Regulator. Furthermore, the PRA has made use of an option not to require entities in its jurisdiction to disclose capital add-on (if any) during a transitional period ending 31 December 2020. No such capital add-ons have been notified to the Association.

F.6. Any other information

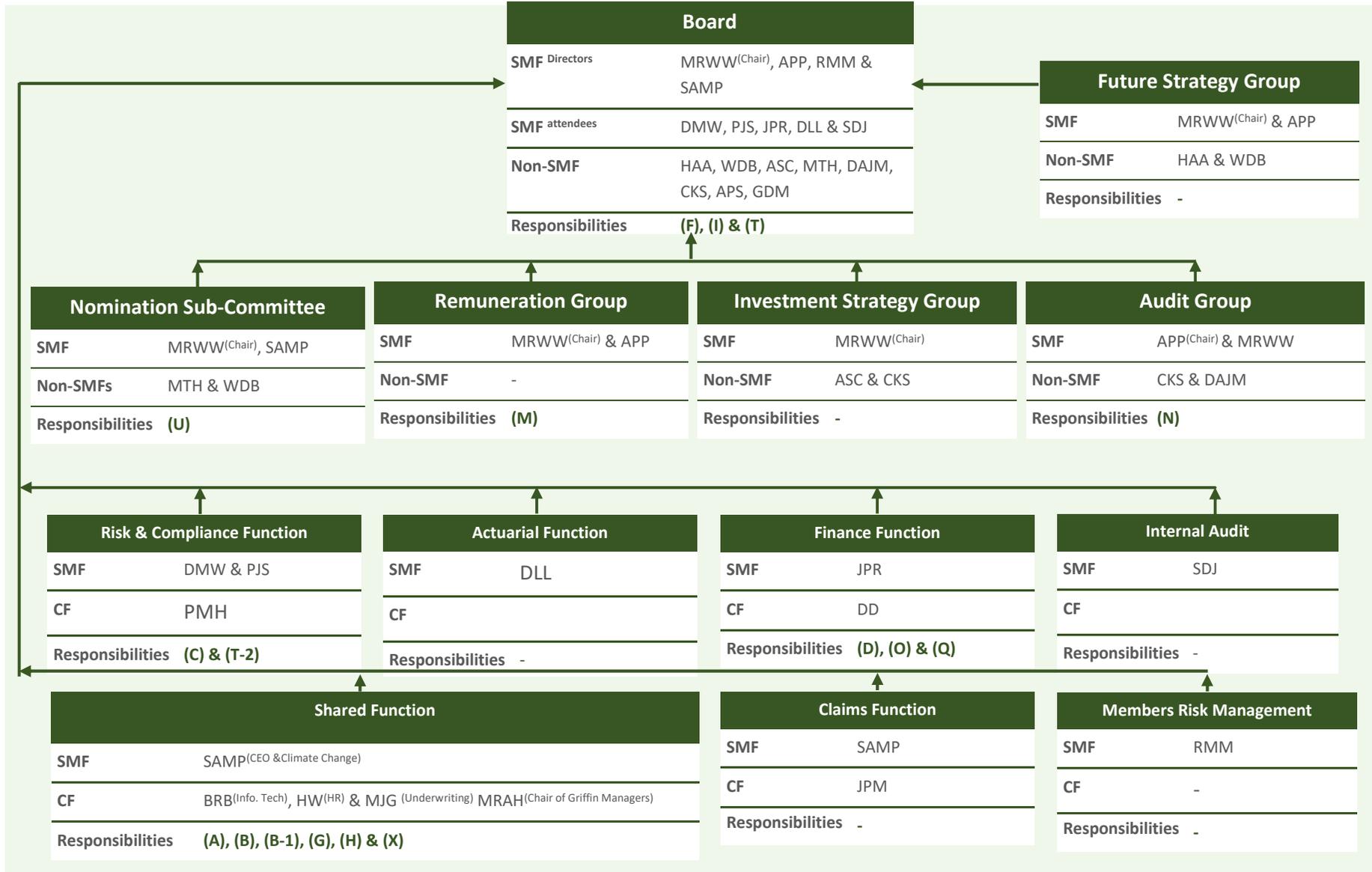
There is no other information to report regarding the Association's capital management.

Appendix A: Governance map and organisational chart

Initials	Name
Senior Managers Function. (SMF)	
APP	Anthony Phillips
DLL	Dave Lamb
DMW	Dan Wilkinson
JPR	Jo Rodgers
MRWW	Mark Warren
RMM	Rhona May
SAMP	Samantha Peat
SDJ	Simon Jones
PJS	Phillippa Smith

Certification Function (CF)	
BRB	Ben Bridges
DD	Deneys Dyter
HW	Hazel Webb
JPM	Julian McGuiggan
MJG	Matthew Grover
MRAH	Mike Hall
PMH	Peter Hey

Notified NEDs (non-SMF)	
APS	Adam Stafford
ASC	Andrew Cross
CKS	Chetan Shah
DAJM	Duncan McKechnie
GDM	Gary Masters
HAA	Hugh Armytage
MTH	Maryse Hazell
WDB	Will Bloomer



Appendix B: Solvency II quantitative reporting templates

The Griffin Insurance Association Limited

Solvency and Financial Condition Report

Disclosures

30 September

2020

(Monetary amounts in GBP thousands)

General information

Undertaking name	The Griffin Insurance Association Limited
Undertaking identification code	213800HUU01N8T1R5KG21
Type of code of undertaking	LEI
Type of undertaking	Non-life undertakings
Country of authorisation	GB
Language of reporting	en
Reporting reference date	30 September 2020
Currency used for reporting	GBP
Accounting standards	Local GAAP
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

- S.02.01.02 - Balance sheet
- S.05.01.02 - Premiums, claims and expenses by line of business
- S.05.02.01 - Premiums, claims and expenses by country
- S.17.01.02 - Non-Life Technical Provisions
- S.19.01.21 - Non-Life insurance claims
- S.23.01.01 - Own Funds
- S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula
- S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

S.02.01.02

Balance sheet

		Solvency II value
		C0010
Assets		
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	122,988
R0080	<i>Property (other than for own use)</i>	0
R0090	<i>Holdings in related undertakings, including participations</i>	0
R0100	<i>Equities</i>	0
R0110	<i>Equities - listed</i>	
R0120	<i>Equities - unlisted</i>	
R0130	<i>Bonds</i>	0
R0140	<i>Government Bonds</i>	0
R0150	<i>Corporate Bonds</i>	0
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	0
R0180	<i>Collective Investments Undertakings</i>	122,988
R0190	<i>Derivatives</i>	
R0200	<i>Deposits other than cash equivalents</i>	0
R0210	<i>Other investments</i>	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	0
R0240	<i>Loans on policies</i>	0
R0250	<i>Loans and mortgages to individuals</i>	
R0260	<i>Other loans and mortgages</i>	
R0270	Reinsurance recoverables from:	-2,562
R0280	<i>Non-life and health similar to non-life</i>	-2,562
R0290	<i>Non-life excluding health</i>	-2,562
R0300	<i>Health similar to non-life</i>	0
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	0
R0320	<i>Health similar to life</i>	
R0330	<i>Life excluding health and index-linked and unit-linked</i>	
R0340	<i>Life index-linked and unit-linked</i>	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	40
R0370	Reinsurance receivables	0
R0380	Receivables (trade, not insurance)	0
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	6,062
R0420	Any other assets, not elsewhere shown	
R0500	Total assets	126,528

S.02.01.02

Balance sheet

		Solvency II value
		C0010
	Liabilities	
R0510	Technical provisions - non-life	24,458
R0520	<i>Technical provisions - non-life (excluding health)</i>	24,458
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	20,200
R0550	<i>Risk margin</i>	4,258
R0560	<i>Technical provisions - health (similar to non-life)</i>	0
R0570	<i>TP calculated as a whole</i>	0
R0580	<i>Best Estimate</i>	0
R0590	<i>Risk margin</i>	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	<i>Technical provisions - health (similar to life)</i>	0
R0620	<i>TP calculated as a whole</i>	
R0630	<i>Best Estimate</i>	
R0640	<i>Risk margin</i>	
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	0
R0660	<i>TP calculated as a whole</i>	
R0670	<i>Best Estimate</i>	
R0680	<i>Risk margin</i>	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	<i>TP calculated as a whole</i>	
R0710	<i>Best Estimate</i>	
R0720	<i>Risk margin</i>	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	
R0790	Derivatives	
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	8,132
R0830	Reinsurance payables	54
R0840	Payables (trade, not insurance)	719
R0850	Subordinated liabilities	0
R0860	<i>Subordinated liabilities not in BOF</i>	
R0870	<i>Subordinated liabilities in BOF</i>	0
R0880	Any other liabilities, not elsewhere shown	
R0900	Total liabilities	33,362
R1000	Excess of assets over liabilities	93,165

S.05.01.02

Premiums, claims and expenses by line of business

Non-life

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	Misc. financial loss	Health	Casualty	Marine, aviation and transport	Property	C0200			
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160				
Premiums written																			
R0110	Gross - Direct Business															5,935			5,935
R0120	Gross - Proportional reinsurance accepted																		0
R0130	Gross - Non-proportional reinsurance accepted																		0
R0140	Reinsurers' share															2,194			2,194
R0200	Net															3,740			3,740
Premiums earned																			
R0210	Gross - Direct Business															5,935			5,935
R0220	Gross - Proportional reinsurance accepted																		0
R0230	Gross - Non-proportional reinsurance accepted																		0
R0240	Reinsurers' share															2,194			2,194
R0300	Net															3,740			3,740
Claims incurred																			
R0310	Gross - Direct Business															1,460			1,460
R0320	Gross - Proportional reinsurance accepted																		0
R0330	Gross - Non-proportional reinsurance accepted																		0
R0340	Reinsurers' share															0			0
R0400	Net															1,460			1,460
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
R0550	Expenses incurred															4,741			4,741
R1200	Other expenses																		
R1300	Total expenses																		4,741

S.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020

Accident year / underwriting year

Gross Claims Paid (non-cumulative)														
(absolute amount)														
Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180	
	Development year										In Current year	Sum of years (cumulative)		
	0	1	2	3	4	5	6	7	8	9			10 & +	
R0100	Prior											2	2	
R0160	2011	101	166	174	136	23	4	6	0	0	0	0	608	
R0170	2012	43	551	264	46	0	0	3	0	0		0	907	
R0180	2013	3,600	1,214	419	15	317	0	0	0			0	5,565	
R0190	2014	39	233	110	48	111	724	203				203	1,468	
R0200	2015	24	67	228	3	0	0					0	322	
R0210	2016	6	256	94	61	3						3	420	
R0220	2017	429	1,297	1,716	412							412	3,854	
R0230	2018	74	32	579								579	685	
R0240	2019	349	400									400	749	
R0250	2020	62										62	62	
R0260												Total	1,660	14,641

Gross Undiscounted Best Estimate Claims Provisions													
(absolute amount)													
Year	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	
	Development year										Year end (discounted data)		
	0	1	2	3	4	5	6	7	8	9		10 & +	
R0100	Prior											40	
R0160	2011	0	0	0	0	0	3,472	75	67	0		0	
R0170	2012	0	0	0	0	0	8,224	502	95	449		450	
R0180	2013	0	0	0	0	9,528	420	498	38			38	
R0190	2014	0	0	0	7,032	89	83	1,421				1,427	
R0200	2015	0	0	6,479	1,891	1,940	71					72	
R0210	2016	0	4,826	1,286	250	512						512	
R0220	2017	12,509	4,636	1,682	5,283							5,287	
R0230	2018	9,214	9,287	682								682	
R0240	2019	5,555	6,863									6,870	
R0250	2020	7,293										7,301	
R0260												Total	22,679

S.23.01.01

Own Funds

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	Share premium account related to ordinary share capital
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
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand
R0320	Unpaid and uncalled preference shares callable on demand
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC
R0390	Other ancillary own funds
R0400	Total ancillary own funds

Available and eligible own funds

R0500	Total available own funds to meet the SCR
R0510	Total available own funds to meet the MCR
R0540	Total eligible own funds to meet the SCR
R0550	Total eligible own funds to meet the MCR

R0580	SCR
R0600	MCR
R0620	Ratio of Eligible own funds to SCR
R0640	Ratio of Eligible own funds to MCR

Reconciliation reserve

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

Expected profits

R0770	Expected profits included in future premiums (EPIFP) - Life business
R0780	Expected profits included in future premiums (EPIFP) - Non- life business
R0790	Total Expected profits included in future premiums (EPIFP)

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
93,165	93,165			
0		0	0	0
0				0
0	0	0	0	0
0				
0				
0				
0				
0			0	0
93,165	93,165	0	0	0

0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0			0	0

93,165	93,165	0	0	0
93,165	93,165	0	0	
93,165	93,165	0	0	0
93,165	93,165	0	0	

24,679
6,170
377.51%
1510.05%

C0060
93,165
0
0
0
93,165

0

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
R0010 Market risk	17,257		
R0020 Counterparty default risk	2,387		
R0030 Life underwriting risk	0		
R0040 Health underwriting risk	0		
R0050 Non-life underwriting risk	11,396		
R0060 Diversification	-6,967		
R0070 Intangible asset risk	0		
R0100 Basic Solvency Capital Requirement	24,073		
Calculation of Solvency Capital Requirement			
R0130 Operational risk	606		
R0140 Loss-absorbing capacity of technical provisions	0		
R0150 Loss-absorbing capacity of deferred taxes			
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200 Solvency Capital Requirement excluding capital add-on	24,679		
R0210 Capital add-ons already set	0		
R0220 Solvency capital requirement	24,679		
Other information on SCR			
R0400 Capital requirement for duration-based equity risk sub-module	0		
R0410 Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420 Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430 Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440 Diversification effects due to RFF nSCR aggregation for article 304	0		
Approach to tax rate			
R0590 Approach based on average tax rate	0		
Calculation of loss absorbing capacity of deferred taxes			
	LAC DT		
	C0130		
R0640 LAC DT			
R0650 LAC DT justified by reversion of deferred tax liabilities	0		
R0660 LAC DT justified by reference to probable future taxable economic profit	0		
R0670 LAC DT justified by carry back, current year	0		
R0680 LAC DT justified by carry back, future years	0		
R0690 Maximum LAC DT	0		

USP Key

For life underwriting risk:

- 1 - Increase in the amount of annuity benefits
- 9 - None

For health underwriting risk:

- 1 - Increase in the amount of annuity benefits
- 2 - Standard deviation for NSLT health premium risk
- 3 - Standard deviation for NSLT health gross premium risk
- 4 - Adjustment factor for non-proportional reinsurance
- 5 - Standard deviation for NSLT health reserve risk
- 9 - None

For non-life underwriting risk:

- 4 - Adjustment factor for non-proportional reinsurance
- 6 - Standard deviation for non-life premium risk
- 7 - Standard deviation for non-life gross premium risk
- 8 - Standard deviation for non-life reserve risk
- 9 - None

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

R0010 MCR_{NL} Result

C0010

2,834

Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
---------------------------------------------------------------------	-------------------------------------------------------------

C0020

C0030

C0020	C0030
0	
0	
0	
0	
0	
0	
0	
0	
22,762	3,740
0	
0	
0	
0	
0	
0	
0	
0	

- R0020 Medical expense insurance and proportional reinsurance
- R0030 Income protection insurance and proportional reinsurance
- R0040 Workers' compensation insurance and proportional reinsurance
- R0050 Motor vehicle liability insurance and proportional reinsurance
- R0060 Other motor insurance and proportional reinsurance
- R0070 Marine, aviation and transport insurance and proportional reinsurance
- R0080 Fire and other damage to property insurance and proportional reinsurance
- R0090 General liability insurance and proportional reinsurance
- R0100 Credit and suretyship insurance and proportional reinsurance
- R0110 Legal expenses insurance and proportional reinsurance
- R0120 Assistance and proportional reinsurance
- R0130 Miscellaneous financial loss insurance and proportional reinsurance
- R0140 Non-proportional health reinsurance
- R0150 Non-proportional casualty reinsurance
- R0160 Non-proportional marine, aviation and transport reinsurance
- R0170 Non-proportional property reinsurance

Linear formula component for life insurance and reinsurance obligations

R0200 MCR_L Result

C0040

0

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

C0050

C0060

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

2,834

R0310 SCR

24,679

R0320 MCR cap

11,105

R0330 MCR floor

6,170

R0340 Combined MCR

6,170

R0350 Absolute floor of the MCR

3,187

R0400 **Minimum Capital Requirement**

6,170
