



Assurant Group Limited Single Group Solvency and Financial Condition Report

Period ended 31 December 2019



ASSURANT®

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Introduction

Assurant Group Limited (“AGL”) is a UK based holding company. As the EEA parent of two UK insurance companies, Assurant General Insurance Limited (“AGIL”) and Assurant Life Limited (“ALL”), AGL is supervised on a group basis by the Prudential Regulation Authority (“PRA”). AGL also owns directly, and indirectly, a number of other regulated insurance intermediaries and unregulated non-insurance companies. Together these companies are referred to in this document as “AGL Group” or “the Group”.

AGIL and ALL are based in the UK and have branches in countries in which Assurant operates in Europe. Both are regulated by the Financial Conduct Authority (“FCA”) and PRA. AGIL and ALL are both subject to Solvency II (“SII”) regulations and are at times referred to in this document as the “SII insurance firms”. The group has no other entities that are subject to SII on a solo basis.

This Solvency and Financial Condition Report (“SFCR” or “Report”) has been prepared under the requirements of the SII regulations as implemented in the UK by the PRA, which became effective from 1 January 2016.

The SFCR covers insurance and non-insurance business undertaken by AGL as well as its two SII insurance firms, AGIL and ALL. AGL has obtained a waiver from the PRA allowing the preparation of a single group SFCR rather than being required to prepare individual SFCRs for the Group, for AGIL and for ALL. The information in this SFCR contains all of the information that would otherwise have been included in the individual SFCRs. Unless specifically stated, references in this document to Assurant Europe Group, AGL Group or the Group should be assumed to apply equally to the SII insurance firms AGIL and ALL.

Assurant, Inc. also owns two other insurance entities in Europe, London General Insurance Company Limited and London General Life Company Limited. These are reported separately as part of the TWG Europe Group and are not included in this SFCR.

The SFCR includes the public quantitative reporting templates included in Section F of this document.

Terms and acronyms used in this document:

Term	Definition
AGIL	Assurant General Insurance Limited
AGL	Assurant Group Limited, the UK holding company of Assurant General Insurance Limited and Assurant Life Limited. The supervised insurance holding company under Solvency II.
AGL Group	Assurant Group Limited and its subsidiaries
ALL	Assurant Life Limited
ARCC	Audit, Risk and Compliance Committee of the Assurant Europe Group, including the AGL Group
Assurant Europe Group	AGL, TWG Europe and their respective subsidiaries and their related branches
Assurant, Inc. or AIZ	Assurant, Inc. the ultimate parent and controlling party of AGL
Board	The board of directors of AGL, AGIL and ALL.
Brexit	The exit of the UK from the EU
CAE	Chief Audit Executive of Assurant, Inc.
ADL	Assurant Direct Limited
EEA	European Economic Area
EIOPA	European Insurance and Occupational Pensions Authority
ELC	European Leadership Committee
ESC	Extended Service Contracts
EU	European Union
FCA	Financial Conduct Authority in the UK
GAAP	Generally Accepted Accounting Practices
IAS	Internal Audit Services
KFH	A Key Function Holder (KFH) is one which has been identified by the PRA because of their influence within the system of governance
LSG	Lifestyle Services Group Limited, an intermediary and insurance administration company within the Group
MCR	Minimum Capital Requirement, calculated as per the Solvency II Directive
MI	Management information
MPI	Mobile Phone Insurance
MRICL	Multi-Risk Indemnity Company Limited, a reinsurer of the Group
ORSA	Own Risk and Solvency Assessment
PRA	Prudential Regulation Authority in the UK
RMF	Risk Management Framework
RSR	Regular Supervisory Report
SCR	Solvency Capital Requirement, calculated as per the Standard Formula set out in the Solvency II Directive
SFCR	Solvency and Financial Condition Report
SIF	Senior Insurance Function
SMF	Senior Manager Function: A SMF is one which has been identified by the PRA as having 'significant influence' on the management and conduct of a firm's regulated activities. These are identified in a firm's Governance Map.
SoG	Systems of Governance
Solvency II or SII	The Solvency II Regulations of the EU as implemented in the UK by the PRA
Standard Formula	The Standard Formula calculation of solvency capital requirements for firms not using an internal model or partial internal model as set out in the Solvency II Directive
TWG Europe	TWG Europe Limited

Summary

AGL Group is part of the International business unit of the Assurant, Inc. group of companies. Assurant, Inc. is a leading global provider of housing, lifestyle and preneed solutions that support, protect and connect major consumer purchases. A Fortune 500 company with a presence in 21 countries, Assurant, Inc. focuses on the housing and lifestyle markets, and is among the market leaders in mobile device protection; extended service contracts; vehicle protection; pre-funded funeral insurance; renters insurance and lender-placed homeowners insurance.

The AGL Group is a leading provider of mobile and consumer electronics protection operating in the UK and European countries such as France, Germany, Spain and Italy.

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

What Assurant offer:		
<ul style="list-style-type: none"> • Mobile Device Protection • Extended Warranty • Digital Secure • Airport Lounge Access • Mobile Security • Protection Accessories 	<ul style="list-style-type: none"> • Connected Living • "The Hubb" • Lifestyle Bundles 	<ul style="list-style-type: none"> • Sales Support and Consultancy • Outsourced Customer Servicing • Fraud Investigation • Supply Chain Management • Brokering • Underwriting

Performance for the period

For the year ended 31 December 2019, AGL Group made an underwriting profit of £2,544,000 (2018:£14,446,000 - Loss) under UK generally accepted accounting practices (GAAP). AGIL made an underwriting profit of £2,592,000 (2018:£12,539,000 - loss) and ALL an underwriting profit of £82,000 (2018:£639,000 - loss) under UK GAAP.

Further details are provided in Section A.

Risk Management

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

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

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

All employees are required to follow the Risk Management Framework and risk management policies and procedures.

The Risk function is responsible for overseeing implementation of the risk strategy and challenging the risks inherent within the business strategy.

Capital and Solvency

The AGL Group, AGIL and ALL calculate their solvency capital requirement (SCR) using the Standard Formula. Own Funds, including the calculation of technical provisions, are calculated based on the valuation requirements set out in the SII Directive.

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

As at 31 December 2019 £'000	AGL Group	AGIL	ALL
Available Own Funds	137,490	87,930	7,614
Eligible Own Funds to meet the SCR and MCR	137,490	87,930	7,614
SCR	71,971	59,599	3,187
Solvency Ratio %	191%	148%	239%

As at 31 December 2018 £'000	AGL Group	AGIL	ALL
Available Own Funds	110,538	79,156	7,462
Eligible Own Funds to meet the SCR and MCR	108,440	79,156	7,462
SCR	71,035	57,198	3,288
Solvency Ratio %	153%	138%	227%

AGL Group, AGIL and ALL maintained own funds in excess of their SCR and MCR requirements for the full year.

The difference between available and eligible own funds relates to the quantitative restrictions applied under the SII Directive to the amount of Tier 2 and Tier 3 capital that is eligible to meet the SCR and MCR. Further detail is given in Section E.

Statement of Directors' Responsibilities

The Directors are responsible for preparing the single group SFCR in accordance with the Prudential Regulatory Authority (PRA) rules and SII Regulations.

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

Each of the Directors, whose names and functions are listed in section B1 of this document on page 27, confirms that, to the best of their knowledge:

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

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

By Order of the Board

Claude Sarfo-Agyare

Chief Financial Officer

17th June 2020

Independent Auditors' Report

Report of the external independent auditors to the Directors of Assurant Group Limited ('the Company') pursuant to Rule 4.1 (2) of the External Audit Part of the PRA Rulebook applicable to Solvency II firms

Report on the Audit of the relevant elements of the Single Group Solvency and Financial Condition Report

Opinion

We have audited the following documents prepared by the Company as at 31 December 2019:

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Single Group Solvency and Financial Condition Report of the Company as at 31 December 2019, (**the Narrative Disclosures subject to audit**); and
- Group templates S.02.01.02, S.23.01.22, S.25.01.22 and S.32.01.22 (**the Group Templates subject to audit**).
- Company templates S.02.01.02, S.12.01.02, S.17.01.02, S.23.01.01, S.25.01.21 and S.28.01.01 in respect of Assurant General Insurance Limited and Assurant Life Limited (**the Company Templates subject to audit**)

The Narrative Disclosures subject to audit, the Group Templates subject to audit and the Company Templates subject to audit are collectively referred to as the '**relevant elements of the Single Group Solvency and Financial Condition Report**'.

We are not required to audit, nor have we audited, and as a consequence do not express an opinion on the **Other Information** which comprises:

- The 'Summary', 'Business and performance', 'System of governance' and 'Risk management' elements of the Single Group Solvency and Financial Condition Report;
- Group templates S.05.01.02 and S.05.02.01 and Company templates S.05.01.02, S.05.02.01 and S.19.01.21;
- The written acknowledgement by management of their responsibilities, including for the preparation of the Single Group Solvency and Financial Condition Report (**the Responsibility Statement**);

In our opinion, the information subject to audit in the relevant elements of the Single Group Solvency and Financial Condition Report of the Company as at 31 December 2019 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based as modified by relevant supervisory modifications.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) including ISA (UK) 800 and ISA (UK) 805, and applicable law. Our responsibilities under those standards are further described in the *Auditors' Responsibilities for the Audit of the relevant elements of the Single Group Solvency and Financial Condition Report* section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the Single Group Solvency and Financial Condition Report in the UK, including the FRC's Ethical Standard as applied to public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the directors' use of the going concern basis of accounting in the preparation of the Single Group Solvency and Financial Condition Report is not appropriate; or
- the directors have not disclosed in the Single Group Solvency and Financial Condition Report any identified material uncertainties that may cast significant doubt about the Company's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from the date when the Single Group Solvency and Financial Condition Report is authorised for issue.

However, because not all future events or conditions can be predicted, this statement is not a guarantee as to the Company's ability to continue as a going concern.

Emphasis of Matter - Basis of Accounting

We draw attention to the 'Valuation for solvency purposes' and 'Capital Management' sections of the Single Group Solvency and Financial Condition Report, which describe the basis of accounting. The Single Group Solvency and Financial Condition Report is prepared in compliance with the financial reporting provisions of the PRA Rules and Solvency II regulations, and therefore in accordance with a special purpose financial reporting framework. The Single Group Solvency and Financial Condition Report is required to be published, and intended users include but are not limited to the Prudential Regulation Authority. As a result, the Single Group Solvency and Financial Condition Report may not be suitable for another purpose. Our opinion is not modified in respect of this matter.

Other Information

The Directors are responsible for the Other Information.

Our opinion on the relevant elements of the Single Group Solvency and Financial Condition Report does not cover the Other Information and we do not express an audit opinion or any form of assurance conclusion thereon.

In connection with our audit of the Single Group Solvency and Financial Condition Report, our responsibility is to read the Other Information and, in doing so, consider whether the Other Information is materially inconsistent with the relevant elements of the Single Group Solvency and Financial Condition Report, or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the relevant elements of the Single Group Solvency and Financial Condition Report or a material misstatement of the Other Information. If, based on the work we have performed,

we conclude that there is a material misstatement of this Other Information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Directors for the Single Group Solvency and Financial Condition Report

The Directors are responsible for the preparation of the Single Group Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations which have been modified by the modifications made by the PRA under section 138A of FSMA, the PRA Rules and Solvency II regulations on which they are based, as detailed below:

- Permission to publish a Single Group SFCR

The Directors are also responsible for such internal control as they determine is necessary to enable the preparation of a Single Group Solvency and Financial Condition Report that is free from material misstatement, whether due to fraud or error.

Auditors' Responsibilities for the Audit of the relevant elements of the Single Group Solvency and Financial Condition Report

It is our responsibility to form an independent opinion as to whether the information subject to audit in the relevant elements of the Single Group Solvency and Financial Condition Report is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

Our objectives are to obtain reasonable assurance about whether the relevant elements of the Single Group Solvency and Financial Condition Report are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decision making or the judgement of the users taken on the basis of the Single Group Solvency and Financial Condition Report.

A further description of our responsibilities for the audit is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditors' report.

This report, including the opinion, has been prepared for the Board of Directors of the Company in accordance with External Audit rule 2.1 of the Solvency II firms Sector of the PRA Rulebook and for no other purpose. We do not, in providing this report, accept or assume responsibility for any other purpose or to any other party save where expressly agreed by our prior consent in writing.

Report on Other Legal and Regulatory Requirements**Other Information**

In accordance with Rule 4.1 (3) of the External Audit Part of the PRA Rulebook for Solvency II firms we are also required to consider whether the Other Information is materially inconsistent with our knowledge obtained in the audit of the Company's statutory financial statements. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

PricewaterhouseCoopers LLP

Chartered Accountants

1 Hardman Square

Manchester

17 June 2020

The maintenance and integrity of the Assurant Group Limited website is the responsibility of the Directors; the work carried out by the auditors does not involve consideration of these matters and, accordingly, the auditors accept no responsibility for any changes that may have occurred to the Single Group-Wide Solvency and Financial Condition Report since it was initially presented on the website.

Legislation in the United Kingdom governing the preparation and dissemination of Solvency and Financial Condition Reports may differ from legislation in other jurisdictions.

A Business and performance

A.1 Business

Undertakings included in the SFCR

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

EEA Supervised Group Parent:	Assurant Group Limited	Legal Form Private limited company	Principle activity Holding company
SII Firms:	Assurant General Insurance Limited PRA firm reference number: 212375	Private Limited company	General insurance
	Assurant Life Limited PRA firm reference number: 202760	Private Limited company	Life insurance

Unless otherwise stated the information in this document should be understood to refer to the AGL Group, to AGIL and to ALL.

Regulator

AGL Group (on a group basis), AGIL and ALL are supervised by the PRA in the UK. AGIL and ALL are also regulated by the FCA in the UK. PRA and FCA contact details are below:

Prudential Regulation Authority 20 Moorgate London EC2R 6DA 0207 601 4878	Financial Conduct Authority 25 The North Colonnade London E14 5HS 0800 111 6768
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Auditor

This SFCR and the financial statements of AGIL and ALL are audited by PricewaterhouseCoopers LLP who can be contacted at:

PricewaterhouseCoopers LLP, Chartered accountants and statutory auditor
1 Hardman Square
Manchester
M3 3EB

Shareholder

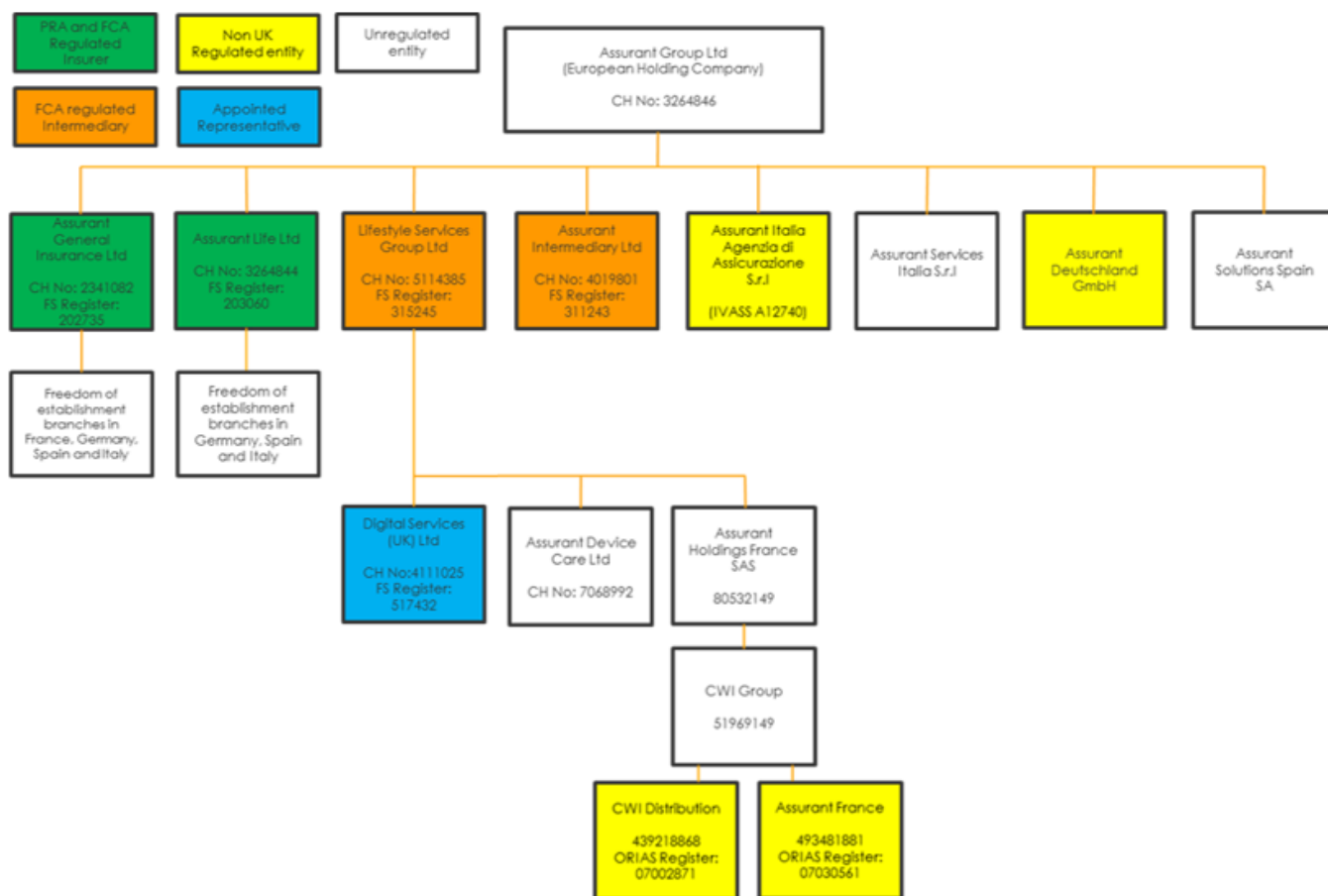
AGL directly holds 100% of the issued share capital and voting rights of AGIL and ALL.

AGL's immediate parent undertaking is Solutions Cayman, a wholly owned subsidiary jointly owned by Solutions Holdings and ABI International, registered in the Grand Cayman Islands. Solutions Cayman holds 100% of the issued share capital and voting rights of AGL.

The ultimate parent undertaking is Assurant, Inc., a publicly listed company on the New York Stock Exchange, registered in Delaware, United States of America.

AGL Group Structure

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



ADL is a service company whose ultimate parent is Assurant, Inc. but is not a subsidiary of AGL. Due to common management at board of directors level between AGL and ADL and the underwriting and service relationships between AGL and ADL, AGL is treated as exerting dominant influence over ADL and therefore ADL is included in AGL's supervised group. The impact of ADL's inclusion in AGL's supervised group is not material.

Lines of Business and Geographical Areas

AGL is a mixed business of insurance underwriting, claims management and insurance administration, which it operates through companies based in the UK and Europe. Its clients are largely business clients. The Group provides extended warranty, Connected Living Device insurance and blended insurance and non-insurance “lifestyle” products.

AGL operates two UK insurance companies, AGIL and ALL, and also issues service contracts through an Italian company, Assurant Services Italia S.r.l. The service contracts issued by Assurant Services Italia S.r.l. are not classified as insurance contracts. AGL operates a number of insurance service companies providing insurance administration services to corporate clients and insurance intermediary services, offering general insurance products and services to UK brokers and independent financial advisors.

In addition, to the above, AGL continues to operate a number of creditor insurance programmes, offering unemployment, disability, death and critical illness cover. These programmes were underwritten by both AGIL and ALL, depending on the length of the policy term.

The majority of AGL’s operations are based in the UK, France and Italy. The table below shows a subset of the main operating entities. These entities are regulated by the PRA and/or FCA and by the relevant supervisor where applicable for non-UK jurisdictions.

Legal Entity	Country of incorporation and branches	Principal activity	Major lines of business
European Parent Company			
• Assurant Group Limited	• United Kingdom	• European holding company	• N/a
SII insurance entities			
• Assurant General Insurance Limited	• United Kingdom Branches: • France • Italy • Germany • Spain	• General Insurance underwriter	• Fire and Other Property Damage • Income Protection • Miscellaneous Financial Loss
• Assurant Life Limited	• United Kingdom Branches: • Italy • Germany • Spain (inactive)	• Life Insurance underwriter	• Health SLT • Other Life

Legal Entity	Country of incorporation and branches	Principal activity	Major lines of business
Insurance intermediary entities			
• Lifestyle Services Group Limited	• United Kingdom	• Intermediary and administrator for products underwritten by AGIL and other underwriters.	
• Assurant Intermediary Limited	• United Kingdom	• Intermediary and administrator for products underwritten by AGIL and other underwriters.	
• Assurant Direct Limited	• United Kingdom	• Intermediary and administrator for products underwritten by AGIL and other underwriters	
• CWI Distribution	• France	• Intermediary and administrator for products underwritten by AGIL and other underwriters.	
• Assurant France	• France	• Intermediary and administrator for products underwritten by AGIL and other underwriters.	
Other material service companies			
• Assurant Services Italia S.r.l.	• Italy	• Service contracts covering mobile device repair, replacement and upgrade programmes.	• Fire and Other Property Damage (service contracts deemed to have insurance properties under SII)

Other group entities not included above do not have a material impact on AGL solvency and capital position.

Significant events during the reporting period

UK exit from the European Union “Brexit”

Assurant has received a license from the Dutch regulators to operate in the EU post Brexit. Assurant is committed to providing clients and policyholders in the UK and Europe with its full suite of innovative risk management solutions including insurance and non-insurance related products. Currently, Assurant have market presence within Germany, France, Spain, Italy, other EU countries and the UK and Assurant contract with customers within these local markets. Assurant’s global expertise is delivered in a culturally sensitive way; aligned to the consumer’s need within their local market.

Assurant Europe Group is in the final stages of establishing new European non-life and life insurers in the Netherlands having received a license to operate in the EU from the Dutch regulators in June 2020. The new insurers will begin to underwrite new policies and renew existing policies for both existing EU and new EU clients of Assurant Europe Group’s UK insurers during 2020. The move from the existing insurers will be managed in order to minimise the operational risk and disruption to customers, clients and employees.

Assurant Europe Group has commenced Part VII transfers to move any existing non-UK business out of its UK insurers, including AGIL, and into the new insurers. This is expected to complete later in 2020 and will affect any remaining policies that are yet to reach expiry, as at the transfer’s effective date. Following completion of the above AGIL and ALL will cease to have any in-force EU policies.

Dialogue with the supervisors in each member state where Assurant Europe Group has insurance customers will continue throughout 2020 during the transition.

Other Significant events

COVID-19

Assurant believes that it must continue to do its part to stem the spread of the virus, while also minimising any disruptions to its operations. To that end, as the virus moved from east to west across the world, Assurant implemented a regional, then global ban on business travel and established work-from-home protocols for employees that are able to do so. For those employees that need to work in global facilities, Assurant continues to enforce safety and hygiene protocols, such as social distancing, per the guidelines of the Center for Disease Control and the World Health Organisation, to safeguard its employees.

Communication throughout this time of uncertainty has been paramount. In addition to communicating with its employees, Assurant has been in direct and regular contact with clients, who also are experiencing the challenges of COVID-19, to ensure Assurant does the utmost to support them and their end-consumers.

Beyond the needs of its employees and customers, Assurant also has been active in maintaining its support within local communities by delivering on its charitable contributions and commitments.

AGL will continue to evaluate additional actions as the situation evolves.

It remains too early to quantify the impact of COVID-19 on the AGL's future performance, which will depend on a number of factors including the extent and duration of the period of disruption and the impact on the UK and European economy. At this point the Group remains focused on supporting its fellow group undertakings' employees and its customers through these challenges whilst maintaining its operational and financial resilience.

AGL maintains a capital buffer, above the solvency capital requirement, to protect against uncertain events. This is monitored and any impact of COVID-19 on the AGL group performance will be regularly assessed.

AGL continues to serve its customers together with its business partners. Although the UK and EU economy has seen wider adverse effects of COVID-19, the insurance industry has been affected to varying degrees. Business volumes may reduce in AGIL as a direct result of declining economic activity. AGIL may experience challenges in servicing customer claims if business partners are forced to close down and lifestyle product claims cost may increase if replacements stocks are not replenished on time or has to settle more claims in cash rather than being able to offer repair options.

Any decline in business volumes could similarly affect the service company Assurant Services Italia S.r.l. in Italy and intermediaries Lifestyle Services Group Limited based in the UK and CWI Distribution based in France.

In ALL, volumes will be unaffected as the entity is no longer issuing new policies though it may experience a deterioration in claim experience due to a potentially higher number of claims caused by the pandemic.

AGL's other non-insurance entities may also experience reduced turnover as a direct result of declining economic activity.

The COVID-19 crisis has seen increasing credit spreads which adversely affects the market valuation of the Group's corporate bond portfolio. The Group is working with its investment advisors, including reviewing the impact of various stresses on the portfolio, to determine the impact and ensure they remain within the Group's risk buffers. Investment advisors have not identified any holdings as being at specific risk of default however they have identified a number of sectors, including for example transport/leisure, as being at risk of downgrade and this continues to be monitored. Section B.9 Any other disclosures on page 39 includes a section on Covid 19 Governance.

Currency exchange rate fluctuations may adversely impact the foreign currency denominated net assets of the Group, the majority of which are in the Euros.

The Group's receivables may be adversely affected if retail clients default. Reinsurance exposures are mostly covered by appropriate collateral in place and hence the risk is not considered material.

The COVID-19 crisis has affected the UK and EU workforce.. Work from home protocols have been established for the majority of staff to provide ongoing customer policy and claims administration services. Contact has been made with third party providers to understand their situation and mitigation plans for the current events and ensure that they can continue to support the firm. A number of providers have implemented work from home mitigations, like most companies globally.

A.2 Underwriting Performance

Consolidated financial statement information in this SFCR is presented on a UK GAAP basis.

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

Reference to "financial statements" below should be understood to refer to audited UK GAAP financial statements in respect of AGIL and ALL and to unaudited UK GAAP consolidated financial statements in respect of AGL Group.

The underwriting performance of AGL Group, AGIL and ALL by material SII line of business as reported in the financial statements is set out below:

AGL GROUP	Fire & Other Damage to		General Business Technical Account	Long Term Business Technical Account	
Year ended 31 December 2019	Property	Other			
£'000					Total
Net written premiums	235,720	2,270	237,989	(59)	237,931
Net premiums earned	238,588	4,060	242,647	(59)	242,589
Net movement in long term business provision	-	-	-	628	628
Net claims incurred including claims management expenses	(145,984)	(905)	(146,888)	50	(146,838)
Net operating expenses	(91,413)	(1,884)	(93,297)	(537)	(93,834)
Net underwriting result	1,191	1,271	2,462	82	2,544

AGIL	Fire & Other Damage to		General Business Technical Account
Year ended 31 December 2019	Property	Other	
£'000			
Net written premiums	225,124	2,008	227,131
Net premiums earned	224,896	2,856	227,752
Net claims incurred including claims management expenses	(135,796)	(362)	(136,158)
Net operating expenses	(87,771)	(1,231)	(89,002)
Net underwriting result	1,329	1,263	2,592

ALL	Health Insurance	Other Life Business	Long Term Business Technical Account
Year ended 31 December 2019			
£'000			
Net written premiums	(15)	(44)	(59)
Net premiums earned	(15)	(44)	(59)
Net movement in long term business provision	123	505	628
Net claims incurred including claims management expenses	129	(79)	50
Net operating expenses	(286)	(251)	(537)
Net underwriting result	(48)	131	82
Other expenses attributed to the long term business account			393
Tax and investment income attributed to the long term business account			43
Statutory balance on the long term business account			518

AGL GROUP					
Year ended 31 December 2018					
£'000	Fire & Other Damage to Property	Other	General Business Technical Account	Long Term Business Technical Account	Total
Net written premiums	220,089	3,502	223,591	(124)	223,467
Net premiums earned	217,397	5,129	222,526	(124)	222,401
Net movement in long term business provision	-	-	-	644	644
Net claims incurred including claims management expenses	(154,304)	(2,098)	(156,402)	(371)	(156,774)
Net operating expenses	(75,876)	(4,054)	(79,931)	(787)	(80,718)
Net underwriting result	(12,783)	(1,024)	(13,807)	(639)	(14,446)

AGIL			
Year ended 31 December 2018			
£'000	Fire & Other Damage to Property	Other	General Business Technical Account
Net written premiums	207,718	2,795	210,513
Net premiums earned	204,758	3,981	208,739
Net claims incurred including claims management expenses	(140,325)	(144,966)	(1,030)
Net operating expenses	(71,901)	(3,382)	(75,283)
Net underwriting result	(12,108)	(431)	(12,539)

ALL			
Year ended 31 December 2018			
£'000	Health Insurance	Other Life Business	Long Term Business Technical Account
Net written premiums	(63)	(61)	(124)
Net premiums earned	(63)	(61)	(124)
Net movement in long term business provision	175	469	644
Net claims incurred including claims management expenses	(100)	(223)	(371)
Net operating expenses	(640)	(147)	(787)
Net underwriting result	(751)	112	(639)
Other expenses attributed to the long term business account			18
Tax and investment income attributed to the long term business account			(179)
Statutory balance on the long term business account			(800)

The analysis of the long-term business technical account for AGL Group and ALL excludes investment income and tax charges/credits that are attributed to long-term business for the purposes of statutory reporting.

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

Analysis of premium, claims and expenses by full SII line of business are included in templates S.05.01 for AGL, AGIL and ALL in Appendix F.

Results and performance

Consolidated

The underwriting performance of the two SII insurers is discussed below. As previously described AGL Group also issues service contracts in Italy that have some insurance properties but are not insurance contracts for Italian regulatory purposes. The performance of these contracts was not material during the year.

AGIL

Gross written premiums increased by 18.1% to £300,803,000 from £254,783,000 compared to 2018. £28,119,000 of this increase was attributable to a mobile device solutions contract which began towards the end of 2016 and which has grown significantly during the year. This contract is fully reinsured to a third party, and hence outward reinsurance premiums associated with this contract also grew by £28,119,000.

The Company's net earned premiums increased by 9% to £227,752,000 from £208,739,000 in 2018. This growth was primarily achieved by focusing on mobile device solutions in mainland Europe, which have continued to grow in Spain and France, along with organic growth in the UK. The loss ratio reduced from 70.4% in 2018 to 60.3% in 2019 driven by improvements in the supply chain of mobile devices. This resulted in net incurred claims reducing by £9,792,000 to £137,237,000 in 2019. The Company's net operating expenses increased by 18.4% to £87,727,000 from £74,068,000 due to higher commissions paid due to the growth in mobile device solutions in the year.

ALL

Gross written premiums cancellations during the year amounted to £33,000 compared to £112,000 the year before. This is due to a reduction in the level of cancellations in the Germany and Ireland creditor insurance business.

Analysis by geography

All general insurance business is underwritten in UK and Europe and all risks are located in UK and Europe. All long-term business underwritten by ALL is underwritten in UK and Europe and all risks are located in UK and Europe.

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

A.3 Investment Performance

AGL Group's investment portfolio is a mix of longer term government and corporate bonds as well as short term investments in collective investment undertakings, being money market liquidity funds and other short term cash deposits. In addition to the investments held to support capital required and technical provisions in AGIL and ALL, the Group may also hold surplus working capital relating to the non-insurance businesses in short term deposits. All investments are made subject to the Group's agreed financial risk policies.

AGIL holds investments in collateralised securities, backed by personal loans and mortgages and by commercial mortgages.

Within the Group, ADL holds a trading equity investment in an unlisted entity.

Interest income is slightly higher in the year but are reducing over the long-term as higher yielding investments purchased in the past have matured and been replaced with more recently issued bonds with lower yields as a result of the prolonged general low yield environment.

AGL Group as at 31 December 2019 £'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	2019 Total
Government Bonds	138	2	31	171
Corporate Bonds	1,699	17	1,886	3,602
Collateralised Securities	13	-	(6)	7
Collective Investment Undertakings	184	-	-	184
Cash & Deposits	16	-	-	16
Loans and mortgages	101	-	-	101
Equity - Unlisted	-	-	-	-
Other	-	-	-	-
Total investment income	2,151	19	1,911	4,081

AGIL				
As at 31 December 2019				2019
£'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	Total
Government Bonds	108	2	31	141
Corporate Bonds	1,699	17	1,886	3,602
Collateralised Securities	14	-	(7)	7
Collective Investment Undertakings	119	-	-	119
Cash & Deposits	(2)	-	-	(2)
Loans and mortgages	306	-	-	306
Total investment income	2,244	19	1,910	4,173

ALL				
As at 31 December 2019				2019
£'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	Total
Government Bonds	29	-	-	30
Corporate Bonds	-	-	-	-
Collective Investment Undertakings	2	-	-	2
Cash & Deposits	1	-	-	1
Loans and mortgages	77	-	-	77
Total investment income	109	-	-	109

AGL Group				
As at 31 December 2018				
£'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	Total
Government Bonds	148	-	(97)	51
Corporate Bonds	1,675	101	(1,877)	(101)
Collateralised Securities	11	-	(17)	(5)
Collective Investment Undertakings	70	-	-	70
Cash & Deposits	36	-	-	36
Loans and mortgages	101	-	-	101
Equity - Unlisted	-	-	5,616	5,616
Total investment income	2,041	101	3,625	5,767

AGIL				
As at 31 December 2018				
£'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	Total
Government Bonds	132	-	(95)	37
Corporate Bonds	1,675	101	(1,877)	(101)
Collateralised Securities	11	-	(17)	(5)
Collective Investment Undertakings	35	-	-	35
Cash & Deposits	1	-	-	1
Loans and mortgages	197	-	-	197
Total investment income	2,052	101	(1,988)	165

ALL As at 31 December 2018 £'000	Interest income / (expense)	Realised gains / (losses)	Unrealised gains / (losses)	Total
Government Bonds	16	-	(3)	13
Corporate Bonds	-	-	-	-
Collective Investment Undertakings	17	-	-	17
Cash & Deposits	3	-	-	3
Loans and mortgages	26	-	-	26
Total investment income	62	-	(3)	59

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

Investment expenses £'000	AGL	AGIL	ALL
Year ended 31 December 2019	196	196	-
Year ended 31 December 2018	181	181	-

A.4 Performance of other activities

AGL Group has a significant amount of non-insurance business including commission income from acting as intermediary for third party insurers, fees for providing insurance and claims administration services and revenue and other fee income in respect of non-insurance products. These fees are generated by the Group's intermediary entities and service companies and are not part of the activity of the insurance firms.

It remains too early to quantify the impact of COVID-19 on the Group's performance, which will depend on a number of factors including the extent and duration of the period of disruption and the impact on the UK and European economy.

AGIL and ALL do not have any sources of material non-insurance income. Non-insurance expenses primarily relate to realised and unrealised foreign exchange gains, which are recognised in the non-technical account in the financial statements. Both insurance firms have net assets denominated in Euros and made gains on the decrease in the value of British Pound Sterling against the Euro in the year.

Year ended 31 December 2019 £'000	AGL Group	AGIL	ALL
Commission and fee income external	117,215	-	-
Commission income from other group companies	53,127	-	-
Operating expenses	(135,830)	181	(366)
Non-insurance result	34,512	181	(366)

Year ended 31 December 2018

£'000

	AGL Group	AGIL	ALL
Commission and fee income external	92,944	-	-
Commission income from other group companies	53,557	-	-
Operating expenses	(133,159)	553	96
Non-insurance result	13,342	553	96

The above expenses exclude amortisation of goodwill and intangibles arising on consolidation of the group.

AGL Group recognises finance Leases for Solvency II purposes for principle office locations in each of the footprint countries. These arrangements are on standard commercial leases.

AGIL and ALL do not have any leasing arrangements in place.

A.5 Any other disclosures

None.

B System of governance

B.1 General governance arrangements

Governance Framework Overview

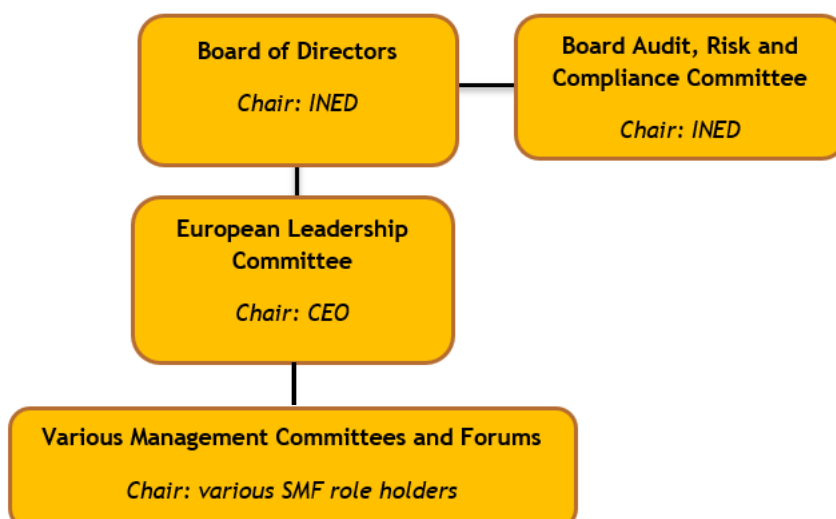
Assurant Europe Group operates a common internal governance framework across all of its entities, countries and lines of business. The framework is organised in a manner relevant to business activities and size, factoring in specific local requirements as necessary.

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

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

The governance framework was re-designed and amended with effect from 1 January 2019 to incorporate control and oversight of four UK entities which Assurant acquired from The Warranty Group in May 2018. The activities of these entities were absorbed into existing board and management committees, ensuring alignment of governance between the acquired entities and the wider Assurant Europe Group.

During 2019, the governance framework was organised through the following key bodies:



Board

Structure and Membership

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

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

During 2019, the Board was composed as listed in the table below. All directors held office for the whole year unless otherwise indicated.

Director	Role	Approved Function	Notes
Colin Martin Kersley	INED	SMF9 - Chairman (from 1/11/2019) SMF10 - Chair of the Risk Committee (until 1/11/2019) SMF11 - Chair of Audit Committee (until 01/11/2019)	
Stuart Edward Purdy	INED	SMF10 - Chair of the Risk Committee (from 1/11/2019) SMF11 - Chair of Audit Committee (from 1/11/2019)	Appointed to board 01/11/2019
Christian Wesley Formby Hernandez	Executive	SMF1 - Chief Executive Officer (from 4/11/2019)	Appointed to board 04/11/2019
Claude Kwasi Sarfo-Agyare	Executive	SMF2 - Chief Finance Officer	
Michael John Carter	Executive	SMF7 - Group Entity Senior Manager	
Ricardo Jesus Morales-Gomez	GNED	SMF7 - Group Entity Senior Insurance Manager (from 21/01/2019)	Appointed to board 21/01/2019
George Derek Wilson Bartlett	INED	SMF9 - Chairman (until 1/11/2019) SMF7 - Group Entity Senior Manager (01/11/2019 to 31/12/2019)	Resigned 31/12/2019
Andrew James Morris	Executive	SMF1 - Chief Executive Officer (until 04/11/2019)	Resigned 04/11/2019

Role and Responsibilities of the Board

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

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

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

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

Board Committees

The Board has established a board-level committee, the **ARCC**, which is responsible for discharging governance responsibilities in respect of audit, risk, internal control and compliance.

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

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

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

Management Committees

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

The management committee structure is led by the ELC which is responsible for managing and overseeing the day to day business and affairs of the Assurant Europe Group in accordance with the agreed strategy and the authority delegated to it by the Board.

The ELC is chaired by the President and is composed of all Executive Directors plus other senior managers nominated by the President to represent certain business units, geographies and functional areas. Formal and regular meetings are held and relevant outputs are reported to the Board regularly via the President.

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

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

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

Material changes in governance structure

Changes to the Board are detailed in the Structure and Membership table above.

Key Functions

A Fit and Proper Person framework is followed to ensure functions are led by appropriately skilled people. In addition to the directors listed in the previous section, the following officers have also been approved by the appropriate UK regulatory bodies as at 31 December 2019 and all are subject to Assurant Europe Group's Fit and Proper Policy.

A complete list of SMF holders is shown below:

Name	Approved Function
C W Formby-Hernandez	SMF1 - Chief Executive Officer
C Sarfo-Agyare	SMF2 - Chief Finance Officer
M J Schofield	SMF4 - Chief Risk Officer
C T Holmes	SMF5 - Head of Internal Audit
M J Carter	SMF7 - Group Entity Senior Insurance Manager
M Morales-Gomez	SMF7 - Group Entity Senior Insurance Manager
C M Kersley	SMF9 - Chairman
S E Purdy	SMF10 - Chair of Risk Committee SMF11 - Chair of Audit Committee
R Weddell	SMF16 - Chief Compliance
R W Green M B P Prada P M O'Callaghan P Briodin R M Carson S S Rai	SMF18 - Other Overall Responsibility
W T Diffey	SMF20 - Chief Actuarial function
G A Davies	SMF23 - Chief Underwriter

Remuneration Policy

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

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

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

remuneration for the purposes of the sound and prudent management of the business and establish remuneration arrangements.

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

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

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

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

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

Non-Executive Directors receive no variable remuneration.

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

There were no material transactions with the shareholders of AGL Group in 2019.

B.2 Fit and proper

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

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

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

- is financially sound (financial soundness).

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

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

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

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

B.3 Risk management system

Risk Management System

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

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

Risk Strategies

AGL adopts a number of risk management strategies to ensure that the group’s risk appetite is not exceeded. The choice of strategy varies depending on the nature of the risk and related circumstances. The strategy for each risk type is documented in the Risk Appetite Statement, a Board owned document. These strategies include:

- Risk acceptance: the AGL Board accepts risks that fall within the boundaries/limits defined in the risk appetite framework. Any risk falling outside the specified limits or boundaries is reviewed to ascertain if the risk appetite requires updating or if an exception should be granted.
- Risk reduction/minimisation: these activities generally relate to control and mitigation activities, and therefore this strategy may include, any or all of the following, the design of new process or

accounting controls, contracting controls, changes in product design, improvement in a set of Terms and Conditions, or other changes designed to control and/or mitigate risk.

- Risk transfer: risk is transferred principally through reinsurance agreements. These may include, but are not limited to stop loss, excess of loss, quota share, or other such treaties. Other types of risk transfer can also be considered.
- Risk Avoidance: where an activity is outside the risk appetite of the AGL Group, AGL will seek to avoid exposure to that type of risk.

Process

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

Enabling Risk Culture	Oversight	Board and Executive	<ul style="list-style-type: none"> • Establishes risk appetite and strategy • ARCC - Approves risk framework and challenges risk management function 	Risk Management Framework and Process Alignment
	3rd Line of Defence	Internal Advisory Services (Internal Audit)	<ul style="list-style-type: none"> • Provides independent assurance on the effectiveness of first and second line of defence functions 	
	2nd Line of Defence	Risk Management Function Compliance Function	<ul style="list-style-type: none"> • Design, interpret and develop overall risk management framework • Overview of AGL Risk Registers • Ownership of ORSA Process and Output • Monitor controls in place against key risks • Challenges risk mitigation and acceptance • Reports on Risk exposures, Issues, mitigations and resolutions 	
	1st Line of Defence	Business / Functions	<ul style="list-style-type: none"> • Executive Risk Owners • Owner of the risk management process • Identifies, manages and mitigates risks • Identifies, manages and reports on Issues 	

AGL has implemented a robust governance structure around Risk Management that is proportionate to the scale and complexity of the group.

Business areas are responsible for completing a Risk and Control Self-Assessment or RCSA which contributes to the Risk Register of the business. They update the risk registers on a periodic basis defined in the risk register process, using measurement techniques specified in Assurant's Risk Management Framework.

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

B.4 Own Risk Solvency Assessment

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

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

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

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

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

ORSA Process



B.5 Internal control

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

The Board is ultimately responsible for overseeing and maintaining the adequacy and effectiveness of the risk management and internal control systems. In practice the oversight and management of these systems necessarily involves participation of the Board, the ARCC, the ELC, senior management, Risk, Finance, Compliance, Legal, Actuarial, business managers, various management committees and Internal Audit.

Primary responsibility for ensuring day-to-day oversight of the internal control system lies with the relevant Senior Manager Functions (SMFs) and Key Function Holders.

Assurant Europe Group promotes the importance of appropriate internal controls by:

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

Assurant Europe Group has a Public Disclosure and Supervisory Reporting Policy, Risk Management Policy, Underwriting and Reinsurance Policy, Capital Management Policy, Internal Audit Policy, Outsourcing Policy, Compliance Policy, Fit and Proper Policy and Governance Map which set out its internal control systems in more detail.

Compliance

Assurant Europe Group operates within a financial services regulatory regime in the UK and Europe. The regulators define the standards required within the business via their rules and guidance, which cover key areas around customer protection and sustainability - with expectations that these principles are embedded in the culture of the business, driven from the top of the organisation and managed via robust governance frameworks. All Assurant Europe Group employees are required to have an awareness of the requirements on them within their role to ensure the business meets the standards required in both letter and spirit, with some Senior Management having specific accountabilities and obligations to the regulators.

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

Assurant Europe Group's Compliance function's purpose is to ensure that the Group meets the regulatory requirements in the jurisdictions in which it does business. Through engagement with the business leaders and a variety of activities and processes to identify, assess, control, measure, mitigate, monitor and report compliance risks across the Group as a part of its oversight and administration of the

Compliance Plan, the Compliance function ensures a strong regulatory compliance culture within the Group.

The function operates independently from the business and is part of Assurant Europe Group's second line of defence, which specifically provides advice on regulatory requirements and assurance regarding the effectiveness of first line controls. It is led by the Chief Compliance Officer in Europe who reports directly to the International Compliance Officer of the parent group and also has direct access to the Board and ARCC as necessary. The Chief Compliance Officer in Europe provides regular updates on the Compliance monitoring activity to the ELC, the ARCC and the Board.

The Compliance function also owns and develops Assurant Europe Group's relationships with key regulators, including the FCA and PRA, which includes taking a forward-looking view to manage regulatory change.

B.6 Internal audit function

Reporting directly to the Assurant Chief Audit Executive ("CAE") and to the ARCC, the Internal Audit Services ("IAS") function, led by the Head of Internal Audit for Europe (HoIA), is responsible for regularly assessing the adequacy of the internal controls system of AGL Group and its subsidiaries, including AGIL, and reporting the findings to the Board (via the ARCC).

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

IAS personnel report directly and solely to the Chief Audit Executive ("CAE") of Assurant, Inc. and the CAE reports directly to the Chair of the Assurant, Inc. Audit Committee; and administratively to Assurant's Chief Legal Officer.

The Internal Audit charter defines the framework for the activities of the internal Audit function and is approved by the Assurant, Inc. Audit Committee.

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

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

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

Audit plan activities typically conclude with some form of communication (audit report, memo, or other testing result) addressed to appropriate management of not only the results of the activities, but also

management's action plans for remediation and/or improvement. Depending on the scope of the engagement these actions could be in the area of risk management, controls, or corporate governance with action plans obtained from appropriate management which are tracked by IAS until final completion as part of the IAS issues follow-up process.

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

B.7 Actuarial function

The actuarial function is responsible for calculating the technical provisions and claims reserves for Assurant Europe Group, as well as calculating the SCR, MCR and ORSA capital on a regular basis. In addition to these key responsibilities, the actuarial function is also responsible for reviewing and calculating the appropriateness of insurance product pricing and contributing to the governance committees, capital initiatives and regulatory returns where appropriate.

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

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

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

B.8 Outsourcing

AGIL and ALL operate as part of the overall Assurant Europe Group that is supervised on a group basis by the PRA. AGIL and ALL have no employees and all services are provided by other Assurant Europe Group companies. The Board of AGL, the European group parent, and of AGIL and ALL are the same and as such these are not considered to be outsourced arrangements.

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

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

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

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

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

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

Critical and key functions that are outsourced:

Outsourced function	Jurisdiction of service provider
Investment Management Services	US, UK
Administration and Claims Management	EU

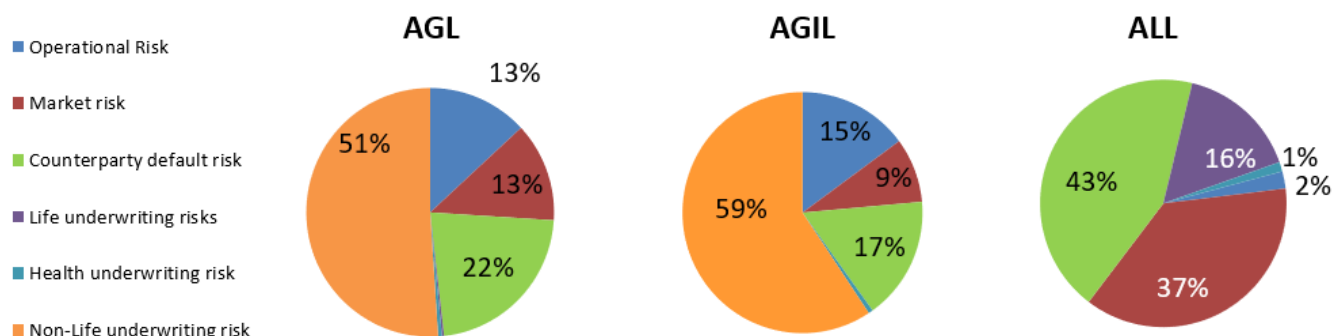
B.9 Any other disclosures

COVID-19 Governance

The Board has continued to operate as described during the disruption caused by the global COVID-19 pandemic using virtual communication technology. An Executive Crisis Management Team ("ECMT"), led by the Chief Strategy and Risk Officer and including key members of senior management, was established at the start of the disruption in line with our business continuity management practice to ensure that decisions and actions are taken in a co-ordinated fashion. The ECMT meets regularly (initially daily) to discuss actions required as a result of COVID-19 and full reports have been made to the Board on a regular basis. Scenario analysis and risk assessment has been completed and reported to the Board and continues to be assessed. Communication has been maintained across the enterprise to ensure that all staff are aware of the latest guidance and actions.

C Risk management

The main risks AGL Group, AGIL and ALL are exposed to are underwriting risk followed by credit risk due to counterparty default. The charts below show the distribution of the SCR required for the Group and each SII insurer by risk module (excluding the diversification effects between the risk modules).



Each risk type is considered below in turn.

C.1 Underwriting risk

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

Measures used to assess underwriting risk

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

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

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

- In calculating the estimated cost of unpaid claims, the Group uses a variety of estimation techniques, generally based upon statistical analyses of historical experience, which assumes that the development pattern of the current claims will be consistent with past experience. Allowance is made, however, for changes or uncertainties which may create distortions in the

underlying statistics or which might cause the cost of unsettled claims to increase or reduce when compared with the cost of previously settled claims.

- The run -off of historic claims reserves is reported to the ARCC annually and the cost of any potential reserve increase is included in the annual ORSA process.

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

Material underwriting risks

Non-Life and Health Not Similar to Life Techniques

- AGL issues non-life insurance policies through AGIL but also considers the service contracts issued in Italy to have risks similar to that of non-life insurance and treats them as such for the purposes of risk management.
- Fluctuation in the frequency and severity of insured events, both relating to policies that were underwritten in the period and to unexpired policies from previous periods, present the most material elements of underwriting risk for AGL.
- Non-life business includes creditor policies (covering sickness, disability and unemployment), extended warranty contracts (covering mechanical breakdown) and property policies (covering loss, theft and accidental damage) where the actual experience could vary significantly from that anticipated when the policy was originally priced.
- In respect of non-life contracts, the business underwritten is short tail compared to other general insurance businesses. Claims are reported and decisions made quickly, especially for Connected Living Device and other property insurance claims. Speed of payment of claims reduces the uncertainty surrounding the ultimate claim amounts and reduces the exposure to Reserve risk.

Life and Health Similar to Life Techniques Business:

- ALL issued creditor policies, classified as Life business, of up to 10 years in length where the actual experience could vary significantly from that anticipated when the policy was originally priced. As ALL is not currently writing new business it is not in a position to make changes to future premiums to offset adverse performance of previously underwritten products. However, it is still able to control insurance risk through appropriate claims control and through setting appropriate reserves.

Risk management

AGL's underwriting and reserving policies applies to all companies within the Group. In general, the risk appetite of AGL is to limit the time period for exposure on underwriting risk to less than one year. Where risk is accepted beyond one year, this will be in exchange for a higher anticipated financial return.

AGL has a range of contractual mitigations included within contracts. These allow for AGL to re-price contracts for new business and renewals and therefore reduce underwriting risk in different scenarios including unexpected financial performance, change of product or processes by the client, impact of regulatory change or change in the supply chain market environment.

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

Concentration of underwriting risk

The Group's and insurance firms' policies are held by individuals across a number of geographic areas and it is not exposed to significant insurance concentration risk.

AGL does not have any material exposure to catastrophe risk.

Risk mitigations

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

Two distinct types of reinsurance are utilised:

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

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

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

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

C.2 Market risk

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

Measures used to assess market risk

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

Management of the AGIL and ALL investment portfolios is outsourced to the investment managers, which operate within the agreed mandates set in accordance with the risk appetite and subject to the prudent person principle. The AGL Treasury function is responsible for monitoring the activities of the investment managers, as well as monitoring and reporting on performance. Material deviations from the mandate or expected risk appetite are escalated through the AGL system of governance and to the ARCC and Board if appropriate.

The Group's, AGIL's and ALL's solvency and economic capital positions are modelled through the annual ORSA process. Market risk exposure is also assessed and quantified in AGL's Standard Formula solvency capital requirement calculation which is completed quarterly.

Material market risks

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

Included within market risk are:

Interest Rate Risk	The fair value of AGL's portfolio of fixed income securities is inversely correlated to changes in the market interest rates. Thus if interest rates fall, the fair value of the portfolio would tend to rise and vice versa.
Currency Risk	<p>AGL operates in the UK and in other European countries, via branches, and is also part of a wider United States group. Accordingly its net assets are subject to currency risk.</p> <p>The primary foreign currency exposures are to Euro and United States Dollar. If the value of Sterling strengthens then the value of the non-Sterling net assets will decline when translated into Sterling.</p> <p>AGL incurs currency risk in two ways:</p> <ul style="list-style-type: none"> Operational currency risk - by holding assets and by underwriting liabilities in currencies other than the currency of the primary environment in which the business units operate (non-functional currencies) Structural currency risk - by operating overseas branches where the currency of the primary environment differs to that of the principal business and being part of an international insurance group
Spread Risk	Spread risk does present a material risk to the business but is closely managed by the use of a suitably diverse investment portfolio. Market value movements or losses caused by the early close out of investments are not considered to be of sufficient materiality to impact solvency.
Property Risk	The Group, AGIL and ALL had no exposure to property risk in the year ended 31 December 2019.
Equity Risk	<p>Assurant Direct Limited, a fellow company that is included in the supervised group due to having the same board and management as AGL, holds a strategic equity trade investment.</p> <p>AGIL and ALL had no exposure to equity risk in the year ended 31 December 2019.</p>

Risk management

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

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

The AGL Board use Assurant Asset Management and Aberdeen Asset Management Limited to manage the investment portfolio. The Group's requirements for the management of its investment portfolio are stipulated in the Investment Management Agreement with the appointed investment managers.

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

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

Equity risk arises due to a trading investment by Assurant Direct Limited in an unlisted company. The investment is strategic in nature and not held for speculative reasons or as part of the Group's general investment portfolio. The valuation of the investment is reviewed at least annually.

Operational and structural currency risk is managed within the Group by broadly matching assets and liabilities by currency. Currency balance sheets are prepared and reviewed by management quarterly.

Concentration of market risk

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

Prudent Person Principle

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

Risk mitigation techniques used for market risk

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

C.3 Credit risk

The Group, AGIL and ALL are exposed to credit risk via:

- default or delay in payments due upon cash;
- reinsurance counterparties failing to meet financial obligations or entering into restructuring arrangements that may adversely affect reinsurance recoveries; and
- default or delay of repayment of loans and receivables.

AGIL and ALL are also exposed to credit risk in respect of amounts from other group companies.

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

Measures used to assess credit risk

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

Material credit risks

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

Risk management

AGL holds cash balances with a number of banks within Europe but diversifies its exposure to ensure that any bank failures do not materially impact liquidity. This includes holding cash in highly liquid money market funds with next day access which AGL treats as a counterparty exposure.

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

Third party reinsurers are required to be credit scored at 'A' (or equivalent) by two out of three of the main rating agencies (Fitch, Moody's or S&P) or be SII regulated in the EU, and in compliance with their solvency capital requirements, in order to be accepted unless appropriate collateral is provided to mitigate the exposure.

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

Concentration of credit risk

Balances for the UK Connected Living Device insurance programmes with UK banking clients generally represent the biggest credit exposures outside of cash holdings, but these can vary significantly, not only from client to client, but from time to time. As AGL has a number of UK banks who are clients as well as providing the Group, AGIL and ALL with banking services, concentration of credit risk is also monitored across asset classes.

Investments in structured entities - collateralised securities and money market funds

The Group invests in collateralised securities and funds managed by external specialist investment managers where investments are pooled within an investment vehicle to provide a diversified exposure to particular classes of underlying investments.

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

Risk mitigation techniques used for credit risk

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

C.4 Liquidity risk

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

Measures used to assess liquidity risk

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

Material liquidity risk

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

The AGL bond portfolio primarily comprises a mixture of UK government securities and corporate bonds with investment grade ratings. All the securities are in active markets and should be convertible into cash with 5 working days.

Investments in collective investment undertakings are in highly liquid money market funds with next day access.

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

Risk management

The Group holds significant cash balances with a number of banks within Europe, but diversifies its exposure to ensure that any bank failures do not materially impact liquidity. Bank cash holdings must follow the liquidity and concentration requirements set out in the Financial Risk Policy.

AGL seeks to maintain assets in classes which can be realised into cash easily with minimal impact on asset valuation. All investible assets should be readily realisable and convertible into cash within 5 working days.

Concentration of liquidity risk

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

ALL holds a significant amount of cash in a single euro money market fund in order to diversify credit risk. This does give rise to a concentration of liquidity risk should a large number of investors in the money market fund all wish to remove their investment at the same time and the fund manager were not able to liquidate sufficient assets to satisfy all the requests. The fund is however highly liquid, with significant investments in cash holdings, cash equivalents and securities traded in active markets and therefore the risk is not considered material.

Risk mitigation techniques used for liquidity risk

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

Expected Profit in Future Premium

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

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

Expected profit in future premiums £'000	AGL GROUP	AGIL	ALL
As at 31 December 2019	3,649	3,649	-
As at 31 December 2018	261	261	-

C.5 Operational risk

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

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

Measures used to assess operational risk

Operational risks are captured through AGL's risk register and risk reporting processes as part of the Risk Management Framework.

In assessing capital required in respect of operational risk the Standard Formula SCR uses earned premium and reserves as a proxy for exposure to operational risk. This is a different approach to that adopted in the AGL ORSA model where individual operational risks are identified and quantified by use of the risk registers. The impact of operational risk on the business is also assessed through the stress and scenario testing carried out as part of the ORSA process.

Material operational risk

AGL provides products to a large number of individuals through direct brands, through networks of indirect dealers and under clients' own branding. It is critical to the success of the business, and in order to retain existing clients and attract new clients, that client and customer expectations in terms of service and product performance are met and that customer service is central to the operation. Service levels and other key indicators in both the customer contact centres and claims fulfilment supply chain are monitored closely by management to ensure that they continue to be met and that any issues that arise are dealt with. The Group also continues to innovate new products and enhancements to existing products to improve and add value to the offering to clients and their customers.

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

Risk management

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

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

Risk mitigation techniques used for operational risk

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

C.6 Other material risks

The below previous events impact AGL's risk profile. More detail is provided in Section A.1 Business.

UK Exit from the EU

Assurant is well progressed in the process to establish an insurer in the Netherlands that will have the permissions to write the European book that would have previously been written by AGIL.

COVID-19

AGL is part of the Assurant, Inc. group. As a global organization, Assurant has been actively monitoring the developments of the rapidly evolving situation resulting from COVID-19. Throughout this period of uncertainty, Assurant has acted swiftly and deliberately to safeguard employees, customers and business operations in line with the Assurant values.

C.7 Stress testing and sensitivity analysis

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

1. Own Funds;
2. Impact on SCR;
3. Resulting solvency margin.

Furthermore, stress testing provides comfort in the assessment of the SCR, ensuring that it remains appropriate and suitable against plausible stressed situations, by not fully exhausting capital above policy holder protection levels.

The 2020 analysis shows that the most significant plausible yet severe stress for the AGL group is a 10% increase in loss ratio. Management and the Board consider this stress a significant but plausible and supports the focus on ongoing monitoring of loss ratio for the business.

The test assumed that there was a 10% increase in loss ratio in year one and that management actions brought the loss ratio back in line with plan for subsequent years. The impact on profit leads to a reduction in Own Funds of around £14m in year one with the solvency ratio being lower than plan in the following years due to the lower year one profit.

Assurant manages its solvency ratio above 100% and uses the results of the stress testing to aid an appropriate level of buffer i.e. capital in excess of the requirement to be held. This is a key element of AGL's capital management process. As such Assurant is able to withstand each of the stresses and scenarios identified above over a 1 year time horizon.

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

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

C.8 Any other disclosures

There are no other matters to be disclosed.

D Valuation for solvency purposes

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

Reference to “financial statements” below should be understood to refer to audited UK GAAP financial statements in respect of AGIL and ALL and to unaudited UK GAAP financial statements in respect of AGL.

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

All valuations are made on the basis that AGL Group, AGIL and ALL are going concerns. The Directors have considered the impact of COVID-19 on the operations and going concern assertion.

D.1 Assets

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

	Solvency II Balance Sheet			Financial Statements		
	AGL GROUP	AGIL	ALL	AGL GROUP	AGIL	ALL
As at 31 December 2019						
£'000						
Goodwill & Intangible Assets	-	-	-	10,310	-	-
Deferred acquisition costs	-	-	-	11,858	11,362	-
Deferred tax assets	1,850	-	-	1,642	756	-
Property, plant & equipment held for own use	7,667	-	-	2,245	-	-
Investments, comprising:	110,885	78,415	4,705	104,174	77,354	4,670
Bonds comprising:	78,392	73,717	4,675	77,296	72,656	4,640
<i>Government Bonds</i>	14,481	9,807	4,675	10,276	5,636	4,640
<i>Corporate Bonds</i>	63,043	63,043	-	67,021	67,021	-
<i>Collateralised securities</i>	868	868	-	-	-	-
Equities - unlisted	9,202	-	-	3,586	-	-
Collective Investments Undertakings	23,139	4,698	30	23,139	4,698	30
Deposits other than cash equivalents	152	-	-	152	-	-
Loans and mortgages	3,942	12,206	2,602	3,942	12,206	2,602
Reinsurance recoverables	2,942	2,875	66	11,370	11,304	66
Deposits to cedants	-	-	-	-	-	-
Insurance and intermediaries receivables	111,969	63,520	17	111,968	63,520	17
Reinsurance receivables	-	-	-	-	-	-
Receivables (trade, not insurance)	3,143	2,653	981	3,143	2,653	981
Cash and cash equivalents	29,220	5,308	2,458	29,220	5,308	2,458
Other assets	20,037	1,879	328	26,221	3,632	363
Total assets	291,655	166,857	11,157	316,094	188,095	11,157

As at 31 December 2018 £'000	Solvency II Balance Sheet			Financial Statements		
	AGL GROUP	AGIL	ALL	AGL GROUP	AGIL	ALL
Goodwill & Intangible Assets	-	-	-	21,727	-	-
Deferred acquisition costs	-	-	-	13,048	12,190	-
Deferred tax assets	4,356	2,794	-	3,345	3,033	-
Property, plant & equipment held for own use	-	-	-	2,535	-	-
Investments, comprising:	98,845	80,173	5,194	92,144	79,124	5,157
Bonds comprising:	75,087	70,442	4,644	74,001	69,394	4,607
<i>Government Bonds</i>	12,435	7,791	4,644	10,351	5,745	4,607
<i>Corporate Bonds</i>	62,294	62,294	-	63,649	63,649	-
<i>Collateralised securities</i>	357	357	-	-	-	-
Equities - unlisted	9,388	-	-	3,773	-	-
Collective Investments Undertakings	14,210	9,730	550	14,210	9,730	550
Deposits other than cash equivalents	160	-	-	160	-	-
Loans and mortgages	3,942	12,206	2,526	3,942	12,206	2,526
Reinsurance recoverables	2,397	2,289	108	5,818	5,710	108
Deposits to cedants	-	-	-	-	-	-
Insurance and intermediaries receivables	96,946	24,692	7	96,946	24,692	7
Reinsurance receivables	62	62	-	62	62	-
Receivables (trade, not insurance)	10,942	6,915	1,001	10,941	6,916	1,001
Cash and cash equivalents	21,914	2,649	2,506	21,914	2,649	2,506
Other assets	23,928	2,137	207	30,613	4,156	245
Total assets	263,332	133,916	11,549	303,034	150,737	11,549

Goodwill and Intangible Assets

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

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

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

Unlisted Equities

AGL Group's unlisted equities are held at fair value on the SII balance sheet. In the financial statements the investments are held at the lower of cost and net realisable value.

Deferred acquisition costs

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

Under SII deferred acquisition costs are valued at zero.

Deferred tax assets

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

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

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

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

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

Deferred Tax reduced in the year, therefore there is no requirement to disclose any absorption requirements in future profits on a Solvency II basis.

Property, plant and equipment held for own use

Property, plant and equipment is held at depreciated cost in the financial statements. For SII, property, plant and equipment, with the exception of property leases, has been valued at zero as the Group does not consider it material or proportionate to expend resource in maintaining records of the items' market values.

A Solvency II adjustment is made for leases for material property occupations as a recognition of right of use assets.

Investments and Loans and mortgages

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

Fair values of financial instruments traded in active markets are based on quoted bid prices on the balance sheet date. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. If listed prices or quotations are not available, fair value is determined by reference to prices for similar instruments, quoted prices or recent transactions in less active markets, or internally developed models that primarily use, as inputs, market based or independently sourced parameters. All investments are valued based on quoted prices. A consistent valuation method was applied across all investments.

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

Reinsurance recoverables

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

Deposits to cedants, insurance and intermediaries receivables and reinsurance receivables

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

Cash and cash equivalents

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

Other Assets

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

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

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

Changes to the recognition and valuation bases

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

D.2 Technical provisions

Results

AGL's technical provisions by material line of business as at 31 December 2019 are set out in reporting templates 12.01.02 Life and Health SLT Technical Provisions (for AGL and ALL) and also 17.01.02 Non-Life Technical Provisions (AGL and AGIL).

As at 31 December 2019 £'000	Income Protection	Fire & Other Damage to Property*	Misc. Financial Loss	Total Non- Life	Other Life	Health (Similar to life)	Total
AGL GROUP							
Gross best estimate	357	33,579	2,786	36,722	918	453	38,093
Reinsurance recoverable	(134)	(1,124)	(1,617)	(2,875)	(46)	(21)	(2,942)
Net best estimate	224	32,454	1,169	33,847	873	432	35,151
Risk margin	49	5,011	132	5,192	15	8	5,215
Total technical provisions	273	37,466	1,301	39,039	888	440	40,367
AGIL							
Gross best estimate	357	20,026	1,984	22,367			22,367
Reinsurance recoverable	(134)	(1,124)	(1,617)	(2,875)			(2,875)
Net best estimate	224	18,902	366	19,492			19,492
Risk margin	49	4,139	80	4,268			4,268
Total technical provisions	273	23,041	447	23,760			23,760
ALL							
Gross best estimate					918	453	1,371
Reinsurance recoverable					(46)	(21)	(66)
Net best estimate					873	432	1,305
Risk margin					15	8	23
Total technical provisions					888	440	1,328

As at 31 December 2018 £'000	Income Protection	Fire & Other Damage to Property*	Misc. Financial Loss	Total Non- Life	Other Life	Health (Similar to life)	Total
AGL Group							
Gross best estimate	588	38,508	3,756	42,852	1,544	771	45,167
Reinsurance recoverable	(143)	(126)	(2,020)	(2,289)	(76)	(32)	(2,397)
Net best estimate	446	38,382	1,735	40,564	1,468	739	42,770
Risk margin	62	4,239	141	4,442	26	13	4,480
Total technical provisions	508	42,621	1,876	45,005	1,493	751	47,250
AGIL							
Gross best estimate	588	24,585	2,488	27,661			27,661
Reinsurance recoverable	(143)	(126)	(2,020)	(2,289)			(2,289)
Net best estimate	446	24,459	468	25,373			25,373
Risk margin	62	3,410	65	3,537			3,537
Total technical provisions	508	27,869	533	28,910			28,910
ALL							
Gross best estimate					1,544	771	2,314
Reinsurance recoverable					(76)	(32)	(108)
Net best estimate					1,468	739	2,206
Risk margin					26	13	39
Total technical provisions					1,493	751	2,245

*direct and proportional reinsurance

Bases, methods and main assumptions

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

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

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

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

The ALL life and health SLT business is examined at an individual policy level, with consideration given to future exposure and expected claims costs. These are then aggregated into the model points and then into SII line of business.

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

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

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

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

The best estimates are calculated separately for each material currency.

The assumptions underlying the calculation of the technical provisions are derived based on the assumption that AGL and AGIL will continue to write new business, and that ALL will not write any new business.

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

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

A different risk-free yield curve is required for each currency, in order to reflect the different cost of borrowing in different currencies.

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

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

The most material ALL assumptions are those which underpin the future exposure periods, and the associated claims and expenses cash flows. These cash flows are calculated by combining a number of different assumptions which are set based on past and expected future experience and are outputs of the valuation model which is part of the valuation process.

The material assumptions used in the calculation of the Technical Provisions are presented annually to the ARCC for approval by the Board.

Level of uncertainty

There are several areas of uncertainty in the calculation of the AGIL Technical Provisions which make up the largest part of the Technical Provisions.

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

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

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

A key area of uncertainty in the ALL Technical Provisions which also contribute to the Technical Provisions will relate to the mortality and morbidity assumptions increasing as this will affect the level of claims cash flows and hence increase the Technical provisions. Due to the relatively small size of the book, the number of claims is subject to statistical volatility. The underlying data and methodology used to inform these assumptions were also the subject of validation and the basis was approved by the board.

The expense assumptions used to calculate the ALL Technical Provisions are derived from the 2018 expenses paid in order to create a per policy expense. An increase in expense costs will increase per policy expenses since ALL is in run off and there won't be a growth in policies to spread the expenses across. This will then increase the expense cash flows in the Technical provisions.

Uncertainty in respect of other business is not material.

Differences between SII and the valuation bases for financial statements

During 2018 it was decided to transition the valuation methodology and basis for ALL for UK GAAP to adopt Solvency II as the basis of preparation for the accounts. This was undertaken in order to simplify the accounts and to aid the users of the accounts. As a result there are no significant differences

between SII and the valuation bases for the ALL legal entity with AGL for the purposes of solvency II and UK GAAP valuation.

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

The methodology for the calculation of the premium provision for the non-life business, in AGIL and the rest of the Group, under SII is fundamentally different to that used in the financial statements. The Premium provision is based on the probability weighted average of future cash flows related to policies within contract boundaries whereas UK GAAP unearned premium reserve is an allocation of premium income to the remaining time to expiry of the insurance contracts already issued. Though not directly comparable the main difference arises due to the recognition of future profit on issued policies and expected profit in future premiums.

Claims Provision

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

Risk Margin

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

No Risk Margin is recognised under UK GAAP. The risk margin calculation assumes Brexit on 1st July 2020 with only UK business underwritten thereafter in AGL.

Discounting

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

The main differences between technical provisions as shown in the financial statements and the SII technical provisions are shown in the table below:

All lines of business	AGL Group	AGIL	ALL
As at 31 December 2019 £'000	Unaudited	Audited	Audited
Technical provisions per financial statements*	45,904	29,355	1,328
Contract boundary adjustment	2,519	1,248	
Adjustment to best estimate premium provision	(14,741)	(14,386)	
Events not in data	908	611	
Difference in expense assumptions	4,043	2,414	
Allowance for lapses	(1,991)	(1,384)	
Adjustment to best estimate claims reserves	(93)	(93)	
Discounting	123	1,508	
Risk Margin	5,192	4,268	
Miscellaneous & FX	(1,497)	219	
Technical provisions per SII balance sheet	40,367	23,760	1,328

All lines of business	AGL Group	AGIL	ALL
As at 31 December 2018 £'000	Unaudited	Audited	Audited
Technical provisions per financial statements*	53,875	31,489	2,245
Contract boundary adjustment	(178)	(178)	
Adjustment to best estimate premium provision	(14,625)	(7,182)	
Difference in expense assumptions	3,612	1,480	
Allowance for lapses	30	30	
Adjustment to best estimate claims reserves	255	150	
Discounting	(29)	(71)	
Risk Margin	4,442	3,537	
Miscellaneous & FX	(131)	(345)	
Technical provisions per SII balance sheet	47,250	28,910	2,245

* unearned premium reserve less deferred acquisition costs plus claims reserves, net of reinsurance.

Matching Adjustment

AGL (Including AGIL and ALL) has not applied the matching adjustment referred to in Article 77b of Directive 2009/138/EC.

Volatility adjustment

AGL Group (Including AGIL and ALL) has not used the volatility adjustment referred to in Article 77d of Directive 2009/138/EC.

Transitional risk-free interest rate-term structure

AGL Group (Including AGIL and ALL) has not applied the transitional risk-free interest rate-term structure referred to in Article 308c of Directive 2009/138/EC.

Transitional deductions

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

Reinsurance

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

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

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

D.3 Other liabilities

Solvency II Other Liabilities

As at 31 December 2019 £'000

	AGL Group	AGIL	ALL
Insurance creditors, reinsurance creditors, trade payables and other financial liabilities	54,679	37,551	2,030
Subordinated loan notes included in basic own funds	33,309	-	-
Other liabilities	41,638	14,739	119
Total Other Liabilities	129,627	52,290	2,149

Solvency II Other Liabilities

As at 31 December 2018 £'000

	AGL Group	AGIL	ALL
Insurance creditors, reinsurance creditors, trade payables and other financial liabilities	51,649	10,792	1,690
Subordinated loan notes included in basic own funds	33,259	-	-
Other liabilities	41,209	12,770	45
Total Other Liabilities	126,118	23,562	1,735

Financial Statements Other Liabilities

As at 31 December 2019 £'000

	AGL	AGIL	ALL
Insurance creditors, reinsurance creditors and trade payables.	47,011	37,551	2,030
Subordinated loan notes included in basic own funds	33,309	-	-
Other liabilities	43,066	14,592	119
Total Other Liabilities	123,386	52,144	2,149

Financial Statements Other Liabilities
As at 31 December 2018 £'000

	AGL	AGIL	ALL
Insurance creditors, reinsurance creditors and trade payables.	51,649	10,792	1,690
Subordinated loan notes included in basic own funds	33,259	-	-
Other liabilities	43,078	12,770	45
Total Other Liabilities	127,986	23,562	1,735

Deferred tax liabilities

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

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

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

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

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

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

Subordinated loans included in basic own funds

AGL has issued subordinated loan notes to an intermediate parent company, outside of the European supervised group.

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

The subordinated loan notes qualify as Tier 2 basic own funds. Further details of the notes and the repayment during the year are given in Section E.1.

Insurance and Intermediary Payables, Trade Payables and Other Liabilities

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

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

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

AGL Group, AGIL and ALL have no material liabilities under finance leases.

AGL Group, AGIL and ALL have no liabilities related to defined benefit pension schemes.

Changes to the recognition and valuation bases

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

D.4 Alternative methods for valuation

No alternative methods of valuation have been used.

D.5 Any other disclosures

There are no material differences between the valuation bases for the consolidated information provided for AGL Group and those used for the solo entity information for AGIL and ALL.

E Capital management

E.1 Own funds

Capital Management Policy

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

The Group's, AGIL's and ALL's capital positions are formally assessed quarterly, and reported to the ARCC, to ensure that own funds continue to meet the targets set.

Own Funds

As at 31 December 2019 £'000	AGL Group	AGIL	ALL
Tier 1	102,330	87,930	7,614
Tier 2	33,309	-	-
Tier 3	1,850	-	-
Available Own Funds	137,490	87,930	7,614

As at 31 December 2018 £'000	AGL Group	AGIL	ALL
Tier 1	72,923	76,362	7,462
Tier 2	33,259	-	-
Tier 3	4,356	2,794	-
Available Own Funds	110,538	79,156	7,462

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

Only AGL has any Tier 2 own funds that are made up of subordinated loans issued to ABI International, an intermediate holding company of AGL. The loans are subordinate to the claims of policyholders of the Group, available to absorb losses, have a minimum term of at least 10 years and no contractual repayment within the first 5 years. Interest is payable annually. No principal or interest is repayable if AGL is in breach of the group SCR or if payment would result in a breach. The change in value in the year arises on the revaluation of the Euro denominated loan.

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

Available own funds for AGL Group increased by £26,952,000 during the year due to the favourable performance of the group as described in Section A leading to a decrease in net assets. AGIL available own funds were £8,774,000 higher than prior year. ALL available own funds were £152,000 below prior year.

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

Eligible own funds for AGL Group, AGIL and ALL comprise:

As at 31 December 2019	AGL Group	AGIL	ALL
£'000			
Tier 1	102,330	87,930	7,614
Tier 2	33,309	-	-
Tier 3	1,850	-	-
Eligible Own Funds	137,490	87,930	7,614

As at 31 December 2018	AGL Group	AGIL	ALL
£'000			
Tier 1	72,923	76,362	7,462
Tier 2	33,259	-	-
Tier 3	2,258	2,794	-
Eligible Own Funds	108,440	79,156	7,462

Eligible own funds for AGL Group have reduced during the year due as described for available own funds above. The Eligible own funds for AGIL and ALL are the same as available own funds.

MCR Eligible Own Funds by Tier:

As at 31 December 2019	AGL Group	AGIL	ALL
£'000			
Tier 1	102,330	87,930	7,614
Tier 2	4,979	-	-
Tier 3	-	-	-
Eligible Own Funds	107,309	87,930	7,614

As at 31 December 2018	AGL Group	AGIL	ALL
£'000			
Tier 1	72,923	76,362	7,462
Tier 2	5,011	-	-
Tier 3	-	-	-
Eligible Own Funds	77,933	76,362	7,462

Eligible own funds for AGL Group to meet the MCR are £107,226,000 in 2019 (2018: 77,933,000).

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

As at 31 December 2019	AGL Group	AGIL	ALL
£'000		Audited	Audited
Equity per financial statements	122,763	83,614	7,614
Valuation of goodwill and intangibles	(8,966)	-	-
Difference between the valuation of technical provisions on a UK GAAP basis and under Solvency II	6,350	5,912	-
Other valuation differences	(1,718)	(692)	-
Deferred tax adjustment	343	(903)	-
Excess of assets over liabilities for solvency purposes	118,720	87,930	7,614

As at 31 December 2018	AGL Group	AGIL	ALL
£'000		Audited	Audited
Equity per financial statements	102,308	78,000	7,462
Valuation of goodwill and intangibles	(19,829)	-	-
Difference between the valuation of technical provisions on a UK GAAP basis and under Solvency II	6,625	2,364	-
Other valuation differences	(2,517)	(970)	-
Deferred tax adjustment	980	(239)	-
Excess of assets over liabilities for solvency purposes	87,567	79,156	7,462

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

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

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

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

E.2 Minimum capital requirement and solvency capital requirement

The SCR and MCR for AGL group, AGIL and ALL as at 31 December 2018 are:

As at 31 December 2019			
£'000	AGL Group	AGIL	ALL
Market Risk	11,464	6,106	579
Counterparty Default Risk	20,486	11,632	675
Non-Life Underwriting Risk	45,317	41,796	-
Life Underwriting Risk	246	-	246
Health Underwriting Risk	436	426	19
Sum of risk modules	77,949	59,960	1,519
Diversification between risk modules	(15,327)	(9,238)	(417)
Basic SCR	62,622	50,722	1,103
Operational Risk	9,349	8,877	25
Standard Formula SCR	71,971	59,599	1,128
MCR	24,894	19,301	3,187

As at 31 December 2018			
£'000	AGL Group	AGIL	ALL
Market Risk	10,109	7,281	333
Counterparty Default Risk	20,645	5,598	682
Non-Life Underwriting Risk	46,342	44,192	-
Life Underwriting Risk	333	-	333
Health Underwriting Risk	678	642	68
Sum of risk modules	78,107	57,713	1,417
Diversification between risk modules	(14,960)	(8,009)	(406)
Basic SCR	63,147	49,704	1,010
Operational Risk	7,888	7,494	48
Standard Formula SCR	71,035	57,198	1,059
MCR	25,053	18,313	3,288

AGL, AGIL and ALL SCRs are all calculated using the Standard Formula and no undertaking specific parameters or simplifications are used.

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

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

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

AGL’s group SCR has decreased £1.9m in the year. Underwriting risk has reduced mainly due to the improvements by the actuarial team in allocating the policies to geographical location of risk. The P&R risk has also reduced over the reporting period due to reduced future premiums as part of the planned transfer of business in the EU. Market risk has increased through the year due to growth in mainland Europe resulting in higher amounts of Euros being held.

AGIL has experienced an increase in SCR as a result of a significant increase in Counterparty default risk due to an increase in the amount of intermediary debt.

ALL’s SCR has fallen due to the reduction in technical provisions over the reporting period. However, as the SCR is below the MCR, SCR movements do not affect ALL’s capital requirement. The MCR is at the absolute floor required by the SII regulation, which is based in Euros, and only changes when the Euro-Sterling rates that firms are required to apply in the calculation change, which occurs annually.

AGL, AGIL and ALL make no adjustment for the Loss Absorbing Capacity of Deferred Tax in the SCR calculation.

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

Neither the group, AGIL nor ALL make use of the duration-based equity risk sub-module in the calculation of the SCR.

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

The Standard Formula is used in the calculation of the group SCR and the solo SCRs for AGIL and ALL.

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

During the year there were no instances of non-compliance with either the SCR or MCR for the AGL group, for AGIL or for ALL.

E.6 Any other disclosures

COVID-19

As described in Section A.1, there are various risks that may arise due to the disruption caused by COVID-19. Management is monitoring the impacts of these on the Group's and SII insurers' capital position and plans.

There is no other material information to disclose regarding the capital management of the AGL, of AGIL or of ALL.

F. Appendices

**Public Group QRTs - Assurant Group Limited, Assurant
General Insurance Limited, Assurant Life Limited**

Balance Sheet
G.02.01.02

		Solvency II value
		C0010
Assets		
R0030	Intangible assets	0
R0040	Deferred tax assets	1,850
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	7,667
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	110,885
R0080	Property (other than for own use)	0
R0090	Holdings in related undertakings, including participations	0
R0100	Equities	9,202
R0110	Equities - listed	0
R0120	Equities - unlisted	9,202
R0130	Bonds	78,392
R0140	Government Bonds	14,481
R0150	Corporate Bonds	63,043
R0160	Structured notes	0
R0170	Collateralised securities	868
R0180	Collective Investments Undertakings	23,139
R0190	Derivatives	0
R0200	Deposits other than cash equivalents	152
R0210	Other investments	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	3,942
R0240	Loans on policies	0
R0250	Loans and mortgages to individuals	0
R0260	Other loans and mortgages	3,942
R0270	Reinsurance recoverables from:	2,942
R0280	Non-life and health similar to non-life	2,875
R0290	Non-life excluding health	2,741
R0300	Health similar to non-life	134
R0310	Life and health similar to life, excluding health and index-linked and unit-linked	66
R0320	Health similar to life	21
R0330	Life excluding health and index-linked and unit-linked	46
R0340	Life index-linked and unit-linked	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	111,968
R0370	Reinsurance receivables	0
R0380	Receivables (trade, not insurance)	3,143
R0390	Own shares (held directly)	0
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	29,220
R0420	Any other assets, not elsewhere shown	20,037
R0500	Total assets	291,655

		Solvency II value
		C0010
R0510	Liabilities	41,914
R0520	Technical provisions – non-life	41,508
R0530	Technical provisions – non-life (excluding health)	0
R0540	TP calculated as a whole	36,365
R0550	Best Estimate	5,143
R0560	Risk margin	406
R0570	Technical provisions - health (similar to non-life)	0
R0580	TP calculated as a whole	357
R0590	Best Estimate	49
R0600	Risk margin	1,394
R0610	Technical provisions - life (excluding index-linked and unit-linked)	461
R0620	Technical provisions - health (similar to life)	0
R0630	TP calculated as a whole	453
R0640	Best Estimate	8
R0650	Risk margin	934
R0660	Technical provisions – life (excluding health and index-linked and unit-linked)	0
R0670	TP calculated as a whole	918
R0680	Best Estimate	15
R0690	Risk margin	0
R0700	Technical provisions – index-linked and unit-linked	0
R0710	TP calculated as a whole	0
R0720	Best Estimate	0
R0730	Risk margin	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	0
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	91
R0780	Deferred tax liabilities	1,285
R0790	Derivatives	0
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	7,668
R0820	Insurance & intermediaries payables	22,917
R0830	Reinsurance payables	4,073
R0840	Payables (trade, not insurance)	19,930
R0850	Subordinated liabilities	33,309
R0860	Subordinated liabilities not in Basic Own Funds	0
R0870	Subordinated liabilities in Basic Own Funds	33,309
R0880	Any other liabilities, not elsewhere shown	40,353
R0900	Total liabilities	172,935
R1000	Excess of assets over liabilities	118,720

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

Premiums written

R0110	Gross - Direct Business
R0120	Gross - Proportional reinsurance accepted
R0130	Gross - Non-proportional reinsurance accepted
R0140	Reinsurers' share
R0200	Net

Premiums earned

R0210	Gross - Direct Business
R0220	Gross - Proportional reinsurance accepted
R0230	Gross - Non-proportional reinsurance accepted
R0240	Reinsurers' share
R0300	Net

Claims incurred

R0310	Gross - Direct Business
R0320	Gross - Proportional reinsurance accepted
R0330	Gross - Non-proportional reinsurance accepted
R0340	Reinsurers' share
R0400	Net

Changes in other technical provisions

R0410	Gross - Direct Business
R0420	Gross - Proportional reinsurance accepted
R0430	Gross - Non- proportional reinsurance accepted
R0440	Reinsurers'share
R0500	Net

Expenses incurred
Other expenses
Total expenses

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)			Total
Income protection insurance	Fire and other damage to property insurance	Miscellaneous financial loss	
C0020	C0070	C0120	C0200
1,108	307,282	3,243	311,633
0	29	0	29
			0
76	71,591	2,005	73,672
1,032	235,720	1,237	237,989
1,502	307,678	3,534	312,714
0	29	0	29
			0
71	69,119	905	70,095
1,431	238,588	2,629	242,647
255	178,151	1,216	179,622
0	0	0	0
			0
53	32,167	514	32,734
202	145,984	703	146,888
0	0	0	0
0	0	0	0
			0
0	0	0	0
0	0	0	0
648	91,413	1,236	93,297
			0
			93,297

Premiums, claims and expenses by line of business - Table 2 G.05.01.02.02

Premiums written

R1410	Gross
R1420	Reinsurers' share
R1500	Net

Premiums earned

R1510	Gross
R1520	Reinsurers' share
R1600	Net

Claims incurred

R1610	Gross
R1620	Reinsurers' share
R1700	Net

Changes in other technical provisions

R1710	Gross
R1720	Reinsurers' share
R1800	Net

Expenses incurred
Other expenses
Total expenses

Line of Business for: life insurance obligations		Total
Health insurance	Other life insurance	
C0210	C0240	C0300
-17	-15	-33
-2	28	26
-15	-44	-59
-17	-15	-33
-2	28	26
-15	-44	-59
-129	191	62
0	112	113
-129	79	-50
-127	-529	-656
-4	-24	-28
-123	-505	-628
286	251	537
		0
		537

Premium, claims and expenses by country

G.05.02.01

		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations						Total Top 5 and home country
		C0010	C0020	C0030	C0040	C0050	C0060		C0070
		FR	DE	IT	0	0			
		C0080	C0090	C0100	C0110	C0120	C0130		C0140
R0010									
	Premiums written								
R0110	Gross - Direct Business	217,973	27,182	25,570	10,858	0	0		281,584
R0120	Gross - Proportional reinsurance accepted	29	0	0	0	0	0		29
R0130	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0		0
R0140	Reinsurers' share	49,026	0	0	0	0	0		49,026
R0200	Net	168,976	27,182	25,570	10,858	0	0		232,587
	Premiums earned								
R0210	Gross - Direct Business	218,914	24,034	24,534	14,896	0	0		282,377
R0220	Gross - Proportional reinsurance accepted	29	0	0	0	0	0		29
R0230	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0		0
R0240	Reinsurers' share	49,026	0	0	0	0	0		49,026
R0300	Net	169,917	24,034	24,534	14,896	0	0		233,380
	Claims incurred								
R0310	Gross - Direct Business	132,357	14,689	7,098	10,731	0	0		164,875
R0320	Gross - Proportional reinsurance accepted	0	0	0	0	0	0		0
R0330	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0		0
R0340	Reinsurers' share	21,264	0	0	0	0	0		21,264
R0400	Net	111,093	14,689	7,098	10,731	0	0		143,611
	Changes in other technical provisions								
R0410	Gross - Direct Business	0	0	0	0	0	0		0
R0420	Gross - Proportional reinsurance accepted	0	0	0	0	0	0		0
R0430	Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0		0
R0440	Reinsurers' share	0	0	0	0	0	0		0
R0500	Net	0	0	0	0	0	0		0
R0550	Expenses incurred	61,007	8,866	13,263	4,295	0	0		87,432
R1200	Other expenses								0
R1300	Total expenses								87,432
		Home Country	Top 5 countries (by amount of gross premiums written) - life obligations						Total Top 5 and home country
		C0150	C0160	C0170	C0180	C0190	C0200		C0210
		IT	IR	DE	0	0			
		C0220	C0230	C0240	C0250	C0260	C0270		C0280
R1400									
	Premiums written								
R1410	Gross	10	-18	-12	-12	0	0		-33
R1420	Reinsurers' share	0	28	0	-2	0	0		26
R1500	Net	10	-46	-12	-10	0	0		-59
	Premiums earned								
R1510	Gross	10	-18	-12	-12	0	0		-33
R1520	Reinsurers' share	0	28	0	-2	0	0		26
R1600	Net	10	-46	-12	-10	0	0		-59
	Claims incurred								
R1610	Gross	1	275	-9	-205	0	0		62
R1620	Reinsurers' share	0	113	0	-1	0	0		113
R1700	Net	1	161	-9	-204	0	0		-50
	Changes in other technical provisions								
R1710	Gross	0	-464	-78	-113	0	0		-656
R1720	Reinsurers' share	0	-22	0	-6	0	0		-28
R1800	Net	0	-442	-78	-107	0	0		-628
R1900	Expenses incurred	-156	292	201	200	0	0		537
R2500	Other expenses								0
R2600	Total expenses								537

Own Funds

G.23.01.22

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector					
R0010 Ordinary share capital (gross of own shares)	277,109	277,109		0	
R0020 Non-available called but not paid in ordinary share capital at group level	0	0		0	
R0030 Share premium account related to ordinary share capital	6,277	6,277		0	
R0040 Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	0	0		0	
R0050 Subordinated mutual member accounts	0		0	0	0
R0060 Non-available subordinated mutual member accounts at group level	0		0	0	0
R0070 Surplus funds	0	0			
R0080 Non-available surplus funds at group level	0	0			
R0090 Preference shares	0		0	0	0
R0100 Non-available preference shares at group level	0		0	0	0
R0110 Share premium account related to preference shares	0		0	0	0
R0120 Non-available share premium account related to preference shares at group level	0		0	0	0
R0130 Reconciliation reserve	-166,517	-166,517			
R0140 Subordinated liabilities	33,309		0	33,309	0
R0150 Non-available subordinated liabilities at group level	0		0	0	
R0160 An amount equal to the value of net deferred tax assets	1,850				1,850
R0170 The amount equal to the value of net deferred tax assets not available at the group level	0				0
R0180 Other items approved by supervisory authority as basic own funds not specified above	0	0	0	0	0
R0190 Non available own funds related to other own funds items approved by supervisory authority	0	0	0	0	0
R0200 Minority interests (if not reported as part of a specific own fund item)	-14,539	-14,539	0	0	0
R0210 Non-available minority interests at group level	0	0	0	0	0
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					
R0220 Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	0				
Deductions					
R0230 Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities	0	0	0	0	0
R0240 whereof deducted according to art 228 of the Directive 2009/138/EC	0	0	0	0	0
R0250 Deductions for participations where there is non-availability of information (Article 229)	0	0	0	0	0
R0260 Deduction for participations included by using D&A when a combination of methods is used	0	0	0	0	0
R0270 Total of non-available own fund items	0	0	0	0	0
R0280 Total deductions	0	0	0	0	0
R0290 Total basic own funds after deductions	137,490	102,330	0	33,309	1,850
Ancillary own funds					
R0300 Unpaid and uncalled ordinary share capital callable on demand	0			0	
R0310 Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0			0	
R0320 Unpaid and uncalled preference shares callable on demand	0			0	0
R0330 A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0			0	0
R0340 Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0			0	
R0350 Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0			0	0
R0360 Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0			0	
R0370 Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0			0	0
R0380 Non available ancillary own funds at group level	0			0	0
R0390 Other ancillary own funds	0			0	0
R0400 Total ancillary own funds	0			0	0
Own funds of other financial sectors					
R0410 Credit institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies - total	0	0	0	0	
R0420 Institutions for occupational retirement provision	0	0	0	0	0
R0430 Non regulated entities carrying out financial activities	0	0	0	0	
R0440 Total own funds of other financial sectors	0	0	0	0	0
Own funds when using the D&A, exclusively or in combination of method 1					
R0450 Own funds aggregated when using the D&A and combination of method	0	0	0	0	0
R0460 Own funds aggregated when using the D&A and a combination of method net of IGT	0	0	0	0	0
Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	137,490	102,330	0	33,309	1,850
R0530 Total available own funds to meet the minimum consolidated group SCR	135,640	102,330	0	33,309	
R0560 Total eligible own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	137,490	102,330	0	33,309	1,850
R0570 Total eligible own funds to meet the minimum consolidated group SCR	107,309	102,330	0	4,979	
Consolidated Group SCR					
R0610 Minimum consolidated Group SCR	24,894				
R0630 Ratio of Eligible own funds to the consolidated Group SCR (excluding other financial sectors and the undertakings included via D&A)					
R0650 Ratio of Eligible own funds to Minimum Consolidated Group SCR	4.3107				
R0660 Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&A)	137,490	102,330	0	33,309	1,850
R0670 SCR for entities included with D&A method					
R0680 Group SCR	71,971				
R0690 Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A	1.9104				
Reconciliation reserve					
R0700 Excess of assets over liabilities	118,720				
R0710 Own shares (held directly and indirectly)	0				
R0720 Forseeable dividends, distributions and charges	0				
R0730 Other basic own fund items	270,698				
R0740 Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0				
R0750 Other non available own funds	14,539				
R0760 Reconciliation reserve before deduction for participations	-166,517				
Expected profits					
R0770 Expected profits included in future premiums (EPIFP) - Life business	0				
R0780 Expected profits included in future premiums (EPIFP) - Non- life business	3,649				
R0790 Total Expected profits included in future premiums (EPIFP)	3,649				

Solvency Capital Requirement - for undertakings on Standard Formula

G.25.01.22

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
R0010 Market risk	11,464		
R0020 Counterparty default risk	20,486		
R0030 Life underwriting risk	246		
R0040 Health underwriting risk	437		
R0050 Non-life underwriting risk	45,317		
R0060 Diversification	-15,328		
R0070 Intangible asset risk	0		
R0100 Basic Solvency Capital Requirement	62,622		
Calculation of Solvency Capital Requirement			
	C0100		
R0130 Operational risk	9,349		
R0140 Loss-absorbing capacity of technical provisions	0		
R0150 Loss-absorbing capacity of deferred taxes	0		
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200 Solvency capital requirement excluding capital add-on	71,971		
R0210 Capital add-on already set	0		
R0220 Solvency capital requirement	71,971		
	Other information on SCR		
R0400 Capital requirement for duration-based equity risk sub-module	0		
R0410 Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420 Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430 Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440 Diversification effects due to RFF nSCR aggregation for article 304	0		
R0470 Minimum consolidated group solvency capital requirement	24,894		
	Information on other entities		
R0500 Capital requirement for other financial sectors (Non-insurance capital requirements)	0		
R0510 Capital requirement for other financial sectors (Non-insurance capital requirements) - Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies	0		
R0520 Capital requirement for other financial sectors (Non-insurance capital requirements) - Institutions for occupational retirement provisions	0		
R0530 Capital requirement for other financial sectors (Non-insurance capital requirements) - Capital requirement for non-regulated entities carrying out financial activities	0		
R0540 Capital requirement for non-controlled participation requirements	0		
R0550 Capital requirement for residual undertakings	0		
	Overall SCR		
R0560 SCR for undertakings included via D and A	0		
R0570 Solvency capital requirement	71,971		

Undertaking in the scope of the group G.32.01.22

Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority	Criteria of influence							Inclusion in the scope of Group supervision		Group solvency calculation	
								% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	YES/NO	Date of decision if art. 214 is applied	Method used and under method 1, treatment of the undertaking	C0260	
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260		
DE	2138000510A01HVR002	LEI	ASSURANT DEUTSCHLAND GMBH	99	GESELLSCHAFT MIT BESCHRANKTER HAFTUNG	2	N/A	100%	100%	100%	0	1	1,0000	1	1	1		
	2138000AVWNSFVDSY141	LEI	ASSURANT GENERAL INSURANCE LIMITED	2	PRIVATE LIMITED COMPANY	2	Prudential Risk Authority	100%	100%	100%	0	1	1,0000	1	1	1		
	2138000L7255M6AWK6251	LEI	ASSURANT GROUP LIMITED	5	PRIVATE LIMITED COMPANY	2	N/A	100%	100%	100%	0	1	1,0000	1	1	1		
	2138000L3UGCGRW65V243	LEI	ASSURANT DIRECT LIMITED	99	PRIVATE LIMITED COMPANY	2	Financial Conduct Authority	0%	100%	0%	0	1	1,0000	1	1	1		
	2138003M6UUVWARK1872	LEI	ASSURANT HOLDINGS FRANCE SAS	99	SOCIETE PAR ACTIONS SIMPLIFIEE A ASSOCIE UNIQUE	2	N/A	100%	100%	100%	0	1	1,0000	1	1	1		
	21380020R12A2RFFP02	LEI	BANCA ITALICA AGENZIA DI ASSICURAZIONE	99	SOCIETA A RESPONSABILITA LIMITATA	2	Istituto per la Vigilanza sulla Assicurazione	100%	100%	100%	0	1	1,0000	1	1	1		
	213800B637ELN63UR16	LEI	ASSURANT INTERMEDIARY LIMITED	99	PRIVATE LIMITED COMPANY	2	Financial Conduct Authority	100%	100%	100%	0	1	1,0000	1	1	1		
	213800UNB8P7N6TXQ08	LEI	ASSURANT LIFE LIMITED	1	PRIVATE LIMITED COMPANY	2	Prudential Risk Authority	100%	100%	100%	0	1	1,0000	1	1	1		
	213800P4R0W65D7PHR98	LEI	ASSURANT SERVICES ITALIA SRL	99	SOCIETA A RESPONSABILITA LIMITATA	2	N/A	100%	100%	100%	0	1	1,0000	1	1	1		
	213800YR7547H9N740	LEI	ASSURANT SOLUTIONS SPAIN SA	99	SOCIEDAD ANONIMA	2	N/A	100%	100%	100%	0	1	1,0000	1	1	1		
	213800W66G6PDDK515	LEI	ASSURANT FRANCE	99	SOCIETE PAR ACTIONS SIMPLIFIEE A ASSOCIE UNIQUE	2	L'Organisme pour le registre des intermediaires en assurance	100%	100%	100%	0	1	1,0000	1	1	1		
	213800G0R9B8WQ2AT42	LEI	CWI DISTRIBUTION	99	SOCIETE PAR ACTIONS SIMPLIFIEE	2	L'Organisme pour le registre des intermediaires en assurance	100%	100%	100%	0	1	1,0000	1	1	1		
	213800R0LW9W7892806	LEI	CWI GROUP	99	SOCIETE PAR ACTIONS SIMPLIFIEE	2	N/A	100%	100%	100%	0	1	1,0000	1	1	1		
	213800G6H9N168U0251	LEI	DIGITAL SERVICES (UK) LIMITED	99	PRIVATE LIMITED COMPANY	2	Financial Conduct Authority	100%	100%	100%	0	1	1,0000	1	1	1		
	213800VWWMRT8XV213	LEI	LIFESTYLE SERVICES GROUP LIMITED	99	PRIVATE LIMITED COMPANY	2	Financial Conduct Authority	100%	100%	100%	0	1	1,0000	1	1	1		
	213800J87Y76LX25571	LEI	ASSURANT DEVICE CASE LIMITED	99	PRIVATE LIMITED COMPANY	2	N/A	100%	100%	100%	0	1	1,0000	1	1	1		
213800C4CJQ0Z1102563	LEI	ASSURANT SERVICES LIMITED	99	LIMITED COMPANY	2	N/A	100%	100%	100%	0	1	1,0000	1	1	1			
2138004508C2K6ARU128	LEI	STARS LIMITED	99	PRIVATE LIMITED COMPANY	2	Financial Conduct Authority	100%	100%	100%	0	1	1,0000	1	1	1			

Balance Sheet

P.02.01.02

		Solvency II value
		C0010
R0030	Assets	0
R0040	Intangible assets	0
R0050	Deferred tax assets	0
R0060	Pension benefit surplus	0
R0070	Property, plant & equipment held for own use	0
R0080	Investments (other than assets held for index-linked and unit-linked contracts)	78,415
R0090	Property (other than for own use)	0
R0100	Holdings in related undertakings, including participations	0
R0110	Equities	0
R0120	Equities - listed	0
R0130	Equities - unlisted	0
R0140	Bonds	73,717
R0150	Government Bonds	9,807
R0160	Corporate Bonds	63,043
R0170	Structured notes	0
R0180	Collateralised securities	868
R0190	Collective Investments Undertakings	4,698
R0200	Derivatives	0
R0210	Deposits other than cash equivalents	0
R0220	Other investments	0
R0230	Assets held for index-linked and unit-linked contracts	0
R0240	Loans and mortgages	12,206
R0250	Loans on policies	0
R0260	Loans and mortgages to individuals	0
R0270	Other loans and mortgages	12,206
R0280	Reinsurance recoverables from:	2,875
R0290	Non-life and health similar to non-life	2,875
R0300	Non-life excluding health	2,741
R0310	Health similar to non-life	134
R0320	Life and health similar to life, excluding health and index-linked and unit-linked	0
R0330	Health similar to life	0
R0340	Life excluding health and index-linked and unit-linked	0
R0350	Life index-linked and unit-linked	0
R0360	Deposits to cedants	0
R0370	Insurance and intermediaries receivables	63,520
R0380	Reinsurance receivables	0
R0390	Receivables (trade, not insurance)	2,653
R0400	Own shares (held directly)	0
R0410	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0420	Cash and cash equivalents	5,308
R0500	Any other assets, not elsewhere shown	1,879
	Total assets	166,857

		Solvency II value
		C0010
R0510	Liabilities	26,636
R0520	Technical provisions – non-life	26,229
R0530	Technical provisions – non-life (excluding health)	0
R0540	TP calculated as a whole	22,010
R0550	Best Estimate	4,219
R0560	Risk margin	406
R0570	Technical provisions - health (similar to non-life)	0
R0580	TP calculated as a whole	357
R0590	Best Estimate	49
R0600	Risk margin	0
R0610	Technical provisions - life (excluding index-linked and unit-linked)	0
R0620	Technical provisions - health (similar to life)	0
R0630	TP calculated as a whole	0
R0640	Best Estimate	0
R0650	Risk margin	0
R0660	Technical provisions – life (excluding health and index-linked and unit-linked)	0
R0670	TP calculated as a whole	0
R0680	Best Estimate	0
R0690	Risk margin	0
R0700	Technical provisions – index-linked and unit-linked	0
R0710	TP calculated as a whole	0
R0720	Best Estimate	0
R0730	Risk margin	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	0
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	91
R0780	Deferred tax liabilities	147
R0790	Derivatives	0
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	17,194
R0830	Reinsurance payables	4,065
R0840	Payables (trade, not insurance)	16,202
R0850	Subordinated liabilities	0
R0860	Subordinated liabilities not in Basic Own Funds	0
R0870	Subordinated liabilities in Basic Own Funds	0
R0880	Any other liabilities, not elsewhere shown	14,592
R0900	Total liabilities	78,927
R1000	Excess of assets over liabilities	87,930

Premiums, claims and expenses by line of business - table 1

P.05.02.01

Premiums written

R0110	Gross - Direct Business
R0120	Gross - Proportional reinsurance accepted
R0130	Gross - Non-proportional reinsurance accepted
R0140	Reinsurers' share
R0200	Net

Premiums earned

R0210	Gross - Direct Business
R0220	Gross - Proportional reinsurance accepted
R0230	Gross - Non-proportional reinsurance accepted
R0240	Reinsurers' share
R0300	Net

Claims incurred

R0310	Gross - Direct Business
R0320	Gross - Proportional reinsurance accepted
R0330	Gross - Non-proportional reinsurance accepted
R0340	Reinsurers' share
R0400	Net

Changes in other technical provisions

R0410	Gross - Direct Business
R0420	Gross - Proportional reinsurance accepted
R0430	Gross - Non- proportional reinsurance accepted
R0440	Reinsurers'share
R0500	Net

Expenses incurred
Other expenses
Total expenses

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)			Total
Income protection insurance	Fire and other damage to property insurance	Miscellaneous financial loss	
C0020	C0070	C0120	C0200
1,108	296,686	2,981	300,774
0	29	0	29
			0
76	71,591	2,005	73,672
1,032	225,124	975	227,131
1,502	293,986	2,330	297,818
0	29	0	29
			0
71	69,119	905	70,095
1,431	224,896	1,425	227,752
255	167,963	673	168,892
0	0	0	0
			0
53	32,167	514	32,734
202	135,796	160	136,158
0	0	0	0
0	0	0	0
			0
0	0	0	0
0	0	0	0
648	87,771	583	89,002
			0
			89,002

Premium, claims and expenses by country

P.05.02.01

	Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
	C0010	C0020	C0030	C0040	C0050	C0060	C0070
R0010		ES	FR	0	0	0	
	C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums written							
R0110 Gross - Direct Business	217,973	27,182	25,570	0	0	0	270,726
R0120 Gross - Proportional reinsurance accepted	29	0	0	0	0	0	29
R0130 Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0140 Reinsurers' share	49,026	0	0	0	0	0	49,026
R0200 Net	168,976	27,182	25,570	0	0	0	221,729
Premiums earned							
R0210 Gross - Direct Business	218,914	24,034	24,534	0	0	0	267,481
R0220 Gross - Proportional reinsurance accepted	29	0	0	0	0	0	29
R0230 Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0240 Reinsurers' share	49,026	0	0	0	0	0	49,026
R0300 Net	169,917	24,034	24,534	0	0	0	218,484
Claims incurred							
R0310 Gross - Direct Business	132,357	14,689	7,098	0	0	0	154,144
R0320 Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0
R0330 Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0340 Reinsurers' share	21,264	0	0	0	0	0	21,264
R0400 Net	111,093	14,689	7,098	0	0	0	132,880
Changes in other technical provisions							
R0410 Gross - Direct Business	0	0	0	0	0	0	0
R0420 Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0
R0430 Gross - Non- proportional reinsurance accepted	0	0	0	0	0	0	0
R0440 Reinsurers'share	0	0	0	0	0	0	0
R0500 Net	0	0	0	0	0	0	0
R0550 Expenses incurred	61,007	8,866	13,263	0	0	0	83,137
R1200 Other expenses							0
R1300 Total expenses							83,137

Non-Life Technical Provisions

P.17.01.02

R0010	Technical provisions calculated as a whole
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole
	Technical provisions calculated as a sum of BE and RM
	Best estimate
	Premium provisions
R0060	Gross
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default
R0150	Net Best Estimate of Premium Provisions
	Claims provisions
R0160	Gross
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default
R0250	Net Best Estimate of Claims Provisions
R0260	Total Best estimate - gross
R0270	Total Best estimate - net
R0280	Risk margin
	Amount of the transitional on Technical Provisions
R0290	Technical Provisions calculated as a whole
R0300	Best estimate
R0310	Risk margin
	Technical provisions - total
R0320	Technical provisions - total
R0330	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total
R0340	Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total

Direct business and accepted proportional			Total Non-Life obligation
Income protection insurance	Fire and other damage to property insurance	Miscellaneous financial loss	
C0030	C0080	C0130	C0180
0	0	0	0
0	0	0	0
37	6,407	1,626	8,069
2	-1,993	1,515	-476
35	8,400	111	8,545
321	13,619	358	14,298
132	3,117	102	3,351
189	10,502	255	10,947
357	20,026	1,984	22,367
224	18,902	366	19,492
49	4,139	80	4,268
0	0	0	0
0	0	0	0
0	0	0	0
406	24,166	2,064	26,636
134	1,124	1,617	2,875
273	23,041	447	23,760

Total Non-Life Business

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

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

[illegible]

Own Funds

P.23.01.01

	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated
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
	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds
R0220	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds
	Deductions
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
71,948	71,948		0	
15,277	15,277		0	
0	0		0	
0		0	0	0
0	0			
0		0	0	0
0		0	0	0
705	705			
0		0	0	0
0				0
0	0	0	0	0
0				
0	0	0	0	0
87,930	87,930	0	0	0
0			0	
0			0	
0			0	0
0			0	0
0			0	0
0			0	0
0			0	0
0			0	0
0			0	0
87,930	87,930	0	0	0
87,930	87,930	0	0	
87,930	87,930	0	0	0
87,930	87,930	0	0	
59,599				
18,965				
1.4754				
4.6364				
C0060				
87,930				
0				
0				
87,225				
0				
705				
0				
3,649				
3,649				

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	R0010	6,106	
R0020	Counterparty default risk	R0020	11,632	
R0030	Life underwriting risk	R0030	0	
R0040	Health underwriting risk	R0040	426	
R0050	Non-life underwriting risk	R0050	41,796	
R0060	Diversification	R0060	-9,238	
R0070	Intangible asset risk	R0070	0	
R0100	Basic Solvency Capital Requirement	R0100	50,722	
	Calculation of Solvency Capital Requirement		C0100	
R0130	Operational risk	R0130	8,877	
R0140	Loss-absorbing capacity of technical provisions	R0140	0	
R0150	Loss-absorbing capacity of deferred taxes	R0150	0	
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	0	
R0200	Solvency capital requirement excluding capital add-on	R0200	59,599	
R0210	Capital add-on already set	R0210	0	
R0220	Solvency capital requirement	R0220	59,599	
	Other information on SCR			
R0400	Capital requirement for duration-based equity risk sub-module	R0400	0	
R0410	Total amount of Notional Solvency Capital Requirement for remaining part	R0410	0	
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	0	
R0430	Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	0	
R0440	Diversification effects due to RFF nSCR aggregation for article 304	R0440	0	
	Approach to tax rate		Yes/No	
			C0109	
R0590	Approach based on average tax rate	R0590	3 - Not applicable as LAC DT is not used (in this case R0600 to R0690 are not applicable)	
	Calculation of loss absorbing capacity of deferred taxes		LAC DT	
			C0130	
R0600	DTA	R0600		
R0610	DTA carry forward	R0610		
R0620	DTA due to deductible temporary differences	R0620		
R0630	DTL	R0630		
R0640	LAC DT	R0640	0	
R0650	LAC DT justified by reversion of deferred tax liabilities	R0650	0	
R0660	LAC DT justified by reference to probable future taxable economic profit	R0660	0	
R0670	LAC DT justified by carry back, current year	R0670	0	
R0680	LAC DT justified by carry back, future years	R0680	0	
R0690	Maximum LAC DT	R0690	0	

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity P.28.01.01
Linear formula component for non-life insurance and reinsurance obligations

	C0010
R0010 MCRNL Result	18,965

Net (of reinsurance/SPV) best estimate and TP calculated as a whole

Net (of reinsurance) written premiums in the last 12 months

	C0020	C0030
R0020 Medical expenses insurance and proportional reinsurance	0	0
R0030 Income protection insurance and proportional reinsurance	224	1,032
R0040 Workers' compensation insurance and proportional reinsurance	0	0
R0050 Motor vehicle liability insurance and proportional reinsurance	0	0
R0060 Other motor insurance and proportional reinsurance	0	0
R0070 Marine, aviation and transport insurance and proportional reinsurance	0	0
R0080 Fire and other damage to property insurance and proportional reinsurance	18,902	225,124
R0090 General liability insurance and proportional reinsurance	0	0
R0100 Credit and suretyship insurance and proportional reinsurance	0	0
R0110 Legal expenses insurance and proportional reinsurance	0	0
R0120 Assistance and proportional reinsurance	0	0
R0130 Miscellaneous financial loss insurance and proportional reinsurance	366	975
R0140 Non-proportional health reinsurance	0	0
R0150 Non-proportional casualty reinsurance	0	0
R0160 Non-proportional marine, aviation and transport reinsurance	0	0
R0170 Non-proportional property reinsurance	0	0

Linear formula component for life insurance and reinsurance obligations

	C0040
R0200 MCRL Result	0

Net (of reinsurance/SPV) best estimate and TP calculated as a whole

Net (of reinsurance/SPV) total capital at risk

	C0050	C0060
R0210 Obligations with profit participation - guaranteed benefits	0	
R0220 Obligations with profit participation - future discretionary benefits	0	
R0230 Index-linked and unit-linked insurance obligations	0	
R0240 Other life (re)insurance and health (re)insurance obligations	0	
R0250 Total capital at risk for all life (re)insurance obligations		0

Overall MCR calculation

	C0070
R0300 Linear MCR	18,965
R0310 SCR	59,599
R0320 MCR cap	26,820
R0330 MCR floor	14,900
R0340 Combined MCR	18,965
R0350 Absolute floor of the MCR	2,153

	C0070
R0400 Minimum Capital Requirement	18,965

		Solvency II value
		C0010
Assets		
R0030	Intangible assets	0
R0040	Deferred tax assets	0
R0050	Pension benefit surplus	0
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	4,705
R0080	Property (other than for own use)	0
R0090	Holdings in related undertakings, including participations	0
R0100	Equities	0
R0110	Equities - listed	0
R0120	Equities - unlisted	0
R0130	Bonds	4,675
R0140	Government Bonds	4,675
R0150	Corporate Bonds	0
R0160	Structured notes	0
R0170	Collateralised securities	0
R0180	Collective Investments Undertakings	30
R0190	Derivatives	0
R0200	Deposits other than cash equivalents	0
R0210	Other investments	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	2,602
R0240	Loans on policies	0
R0250	Loans and mortgages to individuals	0
R0260	Other loans and mortgages	2,602
R0270	Reinsurance recoverables from:	66
R0280	Non-life and health similar to non-life	0
R0290	Non-life excluding health	0
R0300	Health similar to non-life	0
R0310	Life and health similar to life, excluding health and index-linked and unit-linked	66
R0320	Health similar to life	21
R0330	Life excluding health and index-linked and unit-linked	46
R0340	Life index-linked and unit-linked	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	17
R0370	Reinsurance receivables	0
R0380	Receivables (trade, not insurance)	981
R0390	Own shares (held directly)	0
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	2,458
R0420	Any other assets, not elsewhere shown	328
R0500	Total assets	11,157

		Solvency II value
		C0010
R0510	Liabilities	0
R0520	Technical provisions – non-life	0
R0530	Technical provisions – non-life (excluding health)	0
R0540	TP calculated as a whole	0
R0550	Best Estimate	0
R0560	Risk margin	0
R0570	Technical provisions - health (similar to non-life)	0
R0580	TP calculated as a whole	0
R0590	Best Estimate	0
R0600	Risk margin	0
R0610	Technical provisions - life (excluding index-linked and unit-linked)	1,394
R0620	Technical provisions - health (similar to life)	461
R0630	TP calculated as a whole	0
R0640	Best Estimate	453
R0650	Risk margin	8
R0660	Technical provisions – life (excluding health and index-linked and unit-linked)	934
R0670	TP calculated as a whole	0
R0680	Best Estimate	918
R0690	Risk margin	15
R0700	Technical provisions – index-linked and unit-linked	0
R0710	TP calculated as a whole	0
R0720	Best Estimate	0
R0730	Risk margin	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	0
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	0
R0780	Deferred tax liabilities	0
R0790	Derivatives	0
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	108
R0830	Reinsurance payables	8
R0840	Payables (trade, not insurance)	1,913
R0850	Subordinated liabilities	0
R0860	Subordinated liabilities not in Basic Own Funds	0
R0870	Subordinated liabilities in Basic Own Funds	0
R0880	Any other liabilities, not elsewhere shown	119
R0900	Total liabilities	3,543
R1000	Excess of assets over liabilities	7,614

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

R1410 Gross
R1420 Reinsurers' share
R1500 Net

Premiums earned

R1510 Gross
R1520 Reinsurers' share
R1600 Net

Claims incurred

R1610 Gross
R1620 Reinsurers' share
R1700 Net

Changes in other technical provisions

R1710 Gross
R1720 Reinsurers' share
R1800 Net

Expenses incurred

R2500 **Other expenses**
R2600 **Total expenses**

Line of Business for: life insurance		
Health insurance	Other life insurance	Total
C0210	C0240	C0300
-17	-15	-33
-2	28	26
-15	-44	-59
-17	-15	-33
-2	28	26
-15	-44	-59
-129	191	62
0	112	113
-129	79	-50
-127	-529	-656
-4	-24	-28
-123	-505	-628
286	251	537
		0
		537

R1400

Home Country	Top 5 countries (by amount of gross premiums written) - life obligations						Total Top 5 and home country
	C0150	C0160	C0170	C0180	C0190	C0200	C0210
		IR	DE	IT	0	0	
	C0220	C0230	C0240	C0250	C0260	C0270	C0280
Premiums written							
R1410 Gross	10	-12	-12	-18	0	0	-33
R1420 Reinsurers' share	0	0	-2	28	0	0	26
R1500 Net	10	-12	-10	-46	0	0	-59
Premiums earned							
R1510 Gross	10	-12	-12	-18	0	0	-33
R1520 Reinsurers' share	0	0	-2	28	0	0	26
R1600 Net	10	-12	-10	-46	0	0	-59
Claims incurred							
R1610 Gross	1	-9	-205	275	0	0	62
R1620 Reinsurers' share	0	0	-1	113	0	0	113
R1700 Net	1	-9	-204	161	0	0	-50
Changes in other technical provisions							
R1710 Gross	0	-78	-113	-464	0	0	-656
R1720 Reinsurers' share	0	0	-6	-22	0	0	-28
R1800 Net	0	-78	-107	-442	0	0	-628
R1900 Expenses incurred	-156	201	200	292	0	0	537
R2500 Other expenses							0
R2600 Total expenses							537

R0010 **Technical provisions calculated as a whole**
R0020 **Total Recoverables from reinsurance/SPV and Finite Re** after the adjustment for expected losses due to counterparty default associated to TP as a whole
Technical provisions calculated as a sum of BE and RM
Best Estimate
R0030 **Gross Best Estimate**
R0080 Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default
R0090 Best estimate minus recoverables from reinsurance/SPV and Finite Re - total
R0100 **Risk Margin**
Amount of the transitional on Technical Provisions
R0110 Technical Provisions calculated as a whole
R0120 Best estimate
R0130 Risk margin
R0200 **Technical provisions - total**

Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, including Unit-Linked)	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
	Contracts without options and guarantees	Contracts with options or guarantees					Contracts without options and guarantees	Contracts with options or guarantees			
C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
0			0	0	0	0			0	0	0
0			0	0	0	0			0	0	0
	918	0	0	0	918		453	0	0	0	453
	46	0	0	0	46		21	0	0	0	21
	873	0	0	0	873		432	0	0	0	432
15			0	0	15	8			0	0	8
0			0	0	0	0			0	0	0
	0	0	0	0	0		0	0	0	0	0
0			0	0	0	0			0	0	0
934			0	0	934	461			0	0	461

	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated
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
	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds
R0220	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds
	Deductions
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

Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
5,000	5,000		0	
0	0		0	
0	0		0	
0		0	0	0
0	0			
0		0	0	0
0		0	0	0
2,614	2,614			
0		0	0	0
0				0
0	0	0	0	0
0				
0	0	0	0	0
7,614	7,614	0	0	0
0			0	
0			0	
0			0	0
0			0	0
0			0	
0			0	0
0			0	0
0			0	0
0			0	0
7,614	7,614	0	0	0
7,614	7,614	0	0	
7,614	7,614	0	0	0
7,614	7,614	0	0	
1,128				
3,187				
6,7502				
2,3892				
C0060				
7,614				
0				
0				
5,000				
0				
2,614				
0				
0				
0				

			Gross solvency capital requirement	USP	Simplifications
			C0110	C0090	C0120
R0010	Market risk	R0010	579		
R0020	Counterparty default risk	R0020	675		
R0030	Life underwriting risk	R0030	246		
R0040	Health underwriting risk	R0040	19		
R0050	Non-life underwriting risk	R0050	0		
R0060	Diversification	R0060	-417		
R0070	Intangible asset risk	R0070	0		
R0100	Basic Solvency Capital Requirement	R0100	1.103		
			C0100		
R0130	Operational risk	R0130	25		
R0140	Loss-absorbing capacity of technical provisions	R0140	0		
R0150	Loss-absorbing capacity of deferred taxes	R0150	0		
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	0		
R0200	Solvency capital requirement excluding capital add-on	R0200	1.128		
R0210	Capital add-on already set	R0210	0		
R0220	Solvency capital requirement	R0220	1.128		
	Other information on SCR				
R0400	Capital requirement for duration-based equity risk sub-module	R0400	0		
R0410	Total amount of Notional Solvency Capital Requirement for remaining part	R0410	0		
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	0		
R0430	Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	0		
R0440	Diversification effects due to RFF nSCR aggregation for article 304	R0440	0		
			Yes/No		
	Approach to tax rate		C0109		
R0590	Approach based on average tax rate	R0590	3 - Not applicable as LAC DT is not used (in this case R0600 to R0690 are not applicable)		
			LAC DT		
			C0130		
R0600	DTA	R0600			
R0610	DTA carry forward	R0610			
R0620	DTA due to deductible temporary differences	R0620			
R0630	DTL	R0630			
R0640	LAC DT	R0640	0		
R0650	LAC DT justified by reversion of deferred tax liabilities	R0650	0		
R0660	LAC DT justified by reference to probable future taxable economic profit	R0660	0		
R0670	LAC DT justified by carry back, current year	R0670	0		
R0680	LAC DT justified by carry back, future years	R0680	0		
R0690	Maximum LAC DT	R0690	0		

Linear formula component for non-life insurance and reinsurance obligations

		C0010		
R0010	MCRNL Result	0	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
			C0020	C0030
R0020	Medical expenses insurance and proportional reinsurance	0	0	0
R0030	Income protection insurance and proportional reinsurance	0	0	0
R0040	Workers' compensation insurance and proportional reinsurance	0	0	0
R0050	Motor vehicle liability insurance and proportional reinsurance	0	0	0
R0060	Other motor insurance and proportional reinsurance	0	0	0
R0070	Marine, aviation and transport insurance and proportional reinsurance	0	0	0
R0080	Fire and other damage to property insurance and proportional reinsurance	0	0	0
R0090	General liability insurance and proportional reinsurance	0	0	0
R0100	Credit and suretyship insurance and proportional reinsurance	0	0	0
R0110	Legal expenses insurance and proportional reinsurance	0	0	0
R0120	Assistance and proportional reinsurance	0	0	0
R0130	Miscellaneous financial loss insurance and proportional reinsurance	0	0	0
R0140	Non-proportional health reinsurance	0	0	0
R0150	Non-proportional casualty reinsurance	0	0	0
R0160	Non-proportional marine, aviation and transport reinsurance	0	0	0
R0170	Non-proportional property reinsurance	0	0	0

Linear formula component for life insurance and reinsurance obligations

		C0040		
R0200	MCRL Result	136	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
			C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits	0	0	
R0220	Obligations with profit participation - future discretionary benefits	0	0	
R0230	Index-linked and unit-linked insurance obligations	0	0	
R0240	Other life (re)insurance and health (re)insurance obligations	1,305	1,305	
R0250	Total capital at risk for all life (re)insurance obligations			155,420

Overall MCR calculation

		C0070
R0300	Linear MCR	136
R0310	SCR	1,128
R0320	MCR cap	508
R0330	MCR floor	282
R0340	Combined MCR	282
R0350	Absolute floor of the MCR	3,187

		C0070
R0400	Minimum Capital Requirement	3,187