

**ElFlow Holdings Limited**  
**Solvency and Financial Condition**  
**Report**

**For year ending 31<sup>st</sup> December 2024**

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## Executive Summary

The EFlow Holdings Limited group (“the Group”) is an insurance group; since 2012 the principal insurance entity in the Group has been EFlow Insurance Limited (“the Company” or “EIL”), an insurer licensed in Gibraltar. In December 2019 EIL purchased Beacon Insurance Company Limited (“BICL”), a small insurer with net assets of \$5.8 million at 31 December 2022. In July 2022, EIL purchased 100% of the share capital of Kistler Underwriting Holdings Guernsey Limited (“Kistler”) for \$1.69 million. In December 2023 Kistler issued share capital to Bacchus Holdings Limited (“Bacchus”), the parent company of EHL, such that control of Kistler passed from EHL to Bacchus. The Group accounts carry the investment in Kistler as cost and the directors confirm that this value is not impaired.

This document is presented as a group SFCR providing the information for the Gibraltar regulated entities during the period since all entities had common governance, ownership with a focus on legacy or run-off insurance and reinsurance business.

The purpose of the report is to satisfy the public disclosure requirements under the Financial Services (Insurance Companies) Regulations 2020. The elements of the disclosure relate to business performance, governance, risk profile, solvency, and capital management.

The Group has performed well during the year ended 31 December 2024 with profit after tax of \$12.6 million for the financial year per the unaudited consolidated financial statements. Consolidated net assets were \$43.5 million as at 31 December 2024 (2023 - \$30.9 million). Both remaining Gibraltar regulated entities also comfortably met the prescribed MCR and SCR requirements.

The respective Boards continue to monitor and strengthen the corporate governance framework of the group with explicit focus on the risk management function. The governance and risk frameworks are detailed in this report.

### Solvency II

Solvency II (“SII”) came into force with effect from 1 January 2016. The regime required new reporting and public disclosure arrangements to be put in place by insurers. SII focuses on risk-based assessment of the company’s activities, and this produces a Solvency Capital Requirement (“SCR”) which is compared with the assets available to meet that SCR.

The Group’s SCR is calculated on the basis of the standard formula within the Solvency II regulations. EIL and BICL also calculate SCR using the standard formula. The Group’s significant risks identified in standard formula calculations are underwriting risk, market risk and counterparty risk. The tables below summarise the Group’s capital position and capital requirements as at 31 December 2024.

**Table 1** – EHL, EIL and BICL Solvency Capital Requirement, breakdown by type of risk as at 31 December 2024 and 2023. Solvency II values in USD, in millions.

Risk Type	EiFlow Holdings Limited		EiFlow Insurance Limited		Beacon Insurance Company Limited	
	2024	2023	2024	2023	2024	2023
Non- Life underwriting Risk	8.3	4.8	7.4	3.6	1.3	1.6
Life underwriting Risk	0.2	0.2	0.2	0.2	-	-
Health underwriting Risk	0.2		0.2	-	-	
Market Risk	6.7	5.0	7.0	5.9	0.9	1.0
Counterparty Risk	1.7	0.6	1.6	0.5	0.1	0.1
<b>Total before diversification</b>	<b>17.1</b>	<b>10.6</b>	<b>16.5</b>	<b>10.2</b>	<b>2.3</b>	<b>2.7</b>
Diversification	(4.2)	(2.5)	(4.1)	(2.3)	(0.5)	(0.6)
<b>Basic Solvency Capital Requirement</b>	<b>12.9</b>	<b>8.1</b>	<b>12.4</b>	<b>7.9</b>	<b>1.8</b>	<b>2.1</b>
Operational Risk	1.2	0.6	1.1	0.5	0.1	0.1
<b>Solvency Capital Requirement</b>	<b>14.1</b>	<b>8.7</b>	<b>13.5</b>	<b>8.4</b>	<b>1.9</b>	<b>2.2</b>
<b>Minimum Capital Requirement</b>	<b>4.1</b>	<b>4.4</b>	<b>4.1</b>	<b>4.4</b>	<b>4.1</b>	<b>4.4</b>

**Table 2** – EHL, EIL and BICL Solvency Ratio as at 31 December 2024 and 2023. Solvency II values in USD, in millions and percentage values.

	EiFlow Holdings Limited		EiFlow Insurance Limited		Beacon Insurance Company Limited	
	2024	2023	2024	2023	2024	2023
Total Eligible Own Funds to meet the SCR	45.8	36.0	42.2	33.0	7.4	7.0
Solvency Capital Requirement	14.1	8.7	13.5	8.4	1.9	2.2
Ratio of Eligible Own Funds to SCR	325%	413%	312%	393%	390%	313%

The Group has continuously complied with all aspects of the Solvency II regulations from the date of its first implementation on 01 January 2016. The Group has own funds of \$45.8 million (2023 - \$36.0 million) available to cover the calculated solvency capital requirement of \$14.1 million (2023 - \$8.7 million). As at 31 December 2024 the Group's solvency II capital surplus stands at \$31.7 million (2023 - \$27.3 million).

Each of the Gibraltar regulated insurers, EIL and BICL, has performed analyses to assess the effect on its Solvency II capital surplus in stress scenarios. The results of the stress testing for EIL and BICL are detailed in this report at Section C.

The Group's business plans forecast that own funds will significantly exceed the solvency capital requirement at the year ends 2025, 2026 and 2027.

The Group continues to seek run-off opportunities which offer a good return on solvency capital. During 2024 the Group completed a portfolio transfer in December. No additional portfolio transfers are expected in 2025.

Covid-19 has continued to have relatively little impact on the business, which is focused on run-off insurance businesses and consequently not directly affected by pandemic related insurance claims. The insurance subsidiaries continue to monitor the impact on their business and to respond

proactively. The Group is very well capitalised, and it is anticipated that the businesses will continue to meet their obligations.

## A. Business and Performance

### 1. Business Information

- 1.1 This report relates to EIfFlow Holdings Limited (“EHL”) and its subsidiaries EIfFlow Insurance Limited (“EIL”) and Beacon Insurance Company Ltd (“BICL”) (collectively “the Group”). EIL and BICL are insurance companies licensed in Gibraltar and limited by shares.
- 1.2 EHL is a non-regulated holding company also domiciled in Gibraltar (Company number 106965). EHL’s ultimate 100% owning parent company is Bacchus Holdings Limited (“BHL”), a company registered in England and Wales (Company number 09766399).
- 1.3 Neither BHL nor any related entity in the UK is a regulated insurer or forms a substantial part of the BHL business. Therefore, in the view of the Board, group supervision under Solvency II at the EHL level is appropriate.
- 1.4 EIL and BICL are regulated by:
- Gibraltar Financial Services Commission  
PO Box 940  
Suite 3, Atlantic Suites  
Gibraltar, GX11 1AA  
Tel: +350 200 40283  
[www.fsc.gi](http://www.fsc.gi)
- 1.5 The Group’s external Auditor is:
- RSM Audit (Gibraltar) Limited  
21 Engineer Lane  
Gibraltar, GX11 1AA  
Tel: +350 200 74854  
[www.rsm.global](http://www.rsm.global)
- 1.6 The registered office for EHL, EIL and BICL is:
- 5/5 Crutchett’s Ramp  
Gibraltar, GX11 1AA
- 1.7 The equity of EIL is owned 100% by EIfFlow Holdings Ltd (‘EHL’). EHL’s ultimate 100% owning parent company is Bacchus Holdings Limited (“BHL”). The equity of BICL is 100% owned by EIL.

- 1.8 BHL is owned by its Directors and senior staff. As at 31 December 2024 the ownership structure is as follows:

In respect of realisations up to \$27,826,086.96:

- Jeremy Fall 45.50%
- Sean McDermott 45.50%
- James Bolton 3.33%
- Ricardo Cantilo 5.67%

In respect of realisations above \$27,826,086.96 up to \$45,823,458.94:

- Jeremy Fall 29.33%
- Sean McDermott 29.33%
- James Bolton 9.78%
- David Cherry 9.78%
- Ricardo Cantilo 9.78%
- Tom Bailey 3.00%
- Paul Hafner 3.00%
- James Perkins 3.00%
- Russell Streeter 3.00%

In respect of realisations above \$45,823,458.94:

- Jeremy Fall 28.33%
- Sean McDermott 28.33%
- James Bolton 9.44%
- David Cherry 9.44%
- Ricardo Cantilo 9.44%
- Tom Bailey 3.00%
- Paul Hafner 3.00%
- James Perkins 3.00%
- Russell Streeter 3.00%
- Rebecca Hafner 3.00%

- 1.9 Neither EHL nor its subsidiaries have any employees.

- 1.10 Neither EIL nor BICL underwrite new insurance risks and are solely insurance run-off companies. Both companies may obtain legacy business through underwriting if approved by the GFSC. Where existing insurance contracts require extension there may be some limited underwriting of risk as part of the run-off strategy under authorisation from the GFSC. The primary lines of business are:

- Marine, aviation, and transport business ("MAT") from 1985 and prior (EIL).
- Direct marine business from 2012 and prior (EIL).



- Motor (EIL (formerly Preserve) and BICL).
- Reinsurance (BICL and EIL).
- After the Event legal expenses insurance (“ATE”) (EIL).
- Aviation (BICL)
- General liability insurance (EIL)
- Credit and suretyship insurance (EIL)

During 2024 EIL underwrote, by cancel and replacement, a discrete closed book of Mortgage Payment Protection Insurance (MPI) which was previously underwritten by Pinnacle Insurance Plc. The portfolio is managed by a third party agent, WIMS Limited, trading as Wessex Group. The primary lines of business for which licences were granted to EIL in 2024 in order to underwrite this business are:

- Accident (EIL)
- Sickness (EIL)
- Miscellaneous Financial Loss (EIL)

- 1.11 The group and each insurance subsidiary have a financial year running to 31 December and each company reports its results in “\$” (United States Dollars or USD).

## 2. Underwriting Performance

- 2.1 The Group's Gibraltarian insurance entities, EIL and BICL, are insurance companies focused on run-off business. Other than the discrete closed book of MPI business, they do not carry out live underwriting activities. Underwriting activities are limited to the extension of cover on existing risks where there is contractual requirement or, in the case of ATE, where it is a continuation of an ongoing ATE matter. The only other insurance activities are the settlement of claims and the collection of reinsurance.
- 2.2 The majority of outstanding liability on the EIL MAT portfolio arises from US exposure to asbestos, pollution and other health hazards ("APH") (which include health hazard losses include drugs, chemicals and hearing loss related claims).
- 2.3 The direct marine portfolio in EIL is nearing finalisation, with less than \$0.6 million of outstanding claims remaining, most of which relate to non-moving loss advices that pre-date EIL's involvement.
- 2.4 In August 2020, EIL received a portfolio of live ATE policies from Lamp Insurance Company Limited (In Liquidation) ("Lamp"). Under the transfer agreement, profits generated after claims and costs from this portfolio in the five years to August 2025 are to be shared equally with Lamp. As at 31 December 2024, cumulative profits accounted to Lamp under the transfer agreement amounted to \$0.8 million.
- 2.5 In February 2021 EIL underwrote a portfolio of live ATE policies that had been formerly underwritten by Lamp and disclaimed by the liquidator. The premiums on these policies have been paid up front by funding agents. At 31 December 2024 EIL held \$0.7 million in Unearned Premium Reserve (UPR) in respect of these policies.
- 2.6 The BICL portfolio consists primarily of an Aviation portfolio post from 2002 and subsequent which was received by portfolio transfer during 2023. The performance of this portfolio was positive in 2024 and the portfolio is expected to produce profits from the release of claims reserves in future years. BICL also has a Swiss Branch which has been kept open to allow the notification period to expire on some Swiss motor business where there are no outstanding claims. BICL finalised its reinsurance CAT liabilities with Hannover Re during 2024.
- 2.7 The Preserve portfolio which has been transferred to EIL is motor class only with a single PPO and a small number of outstanding claims. All large claims including the PPO are protected by quality reinsurance.
- 2.8 On 31 December 2024 EIL completed a portfolio transfer with Pinnacle Insurance plc (Pinnacle) covering all non-life non-pet insurance previously underwritten by Pinnacle. The gross and net claim reserves held by EIL at 31 December 2024 in respect of the Pinnacle portfolio amounted to \$19.8 million and \$8.5 million respectively. The portfolio includes 4 motor PPOs which are protected by quality reinsurance.

2.10 The profit for the group in 2024 was as follows.

**Table 3** – EHL, EIL and BICL performance as at 31 December 2024 and 2023. USD, in thousands.

Underwriting performance	EiFlow Holdings Limited		EiFlow Insurance Limited		Beacon Insurance Company Limited	
	2024	2023	2024	2023	2024	2023
Gross premiums	4,799	4,393	4,799	4,170	-	(10)
Commissions and reinstatement premiums	(1,129)	142	(1,129)	153	-	-
Gross claims paid	(635)	(3,479)	(475)	(2,948)	(160)	(531)
Reinsurers' share of gross claims	15	159	15	159	-	-
Gross change in insurance liabilities	420	1,300	9	(480)	411	1,781
Reinsurers' share of gross change in insurance liabilities	(58)	(256)	(58)	(256)	-	-
Other operating and administrative expenses	(2,879)	(2,867)	(2,280)	(1,696)	(599)	(864)
<b>Net Underwriting Result</b>	<b>533</b>	<b>(608)</b>	<b>881</b>	<b>(898)</b>	<b>(348)</b>	<b>376</b>

### 3. Investment Performance

- 3.1 EHL holds restricted cash of £0.7 million (\$0.9 million) (2023 - \$0.9 million) at a local bank as a security guarantee. EIL and BICL hold a diversified high-quality government and corporate investment portfolio managed by Bank J. Safra Sarasin (Gibraltar) ('JSS'). The investment portfolios of EIL and BICL as at 31 December 2024 were valued at \$30.9 million and \$10.0 million respectively (2023 - \$23.5 million and \$10.1 million). The investments are held predominantly in USD, although EIL did hold portfolios of £2.1 million and €3.9 million within the \$30.9 million funds at year end. The investment expenses are not significant in the context of the group's total expenses. The Board of Directors of each company is directly responsible for investment decisions and is ably supported by JSS.
- 3.2 EIL has also invested funds in the Mangrove Partners Fund managed by Mangrove Partners, a value-oriented investment manager based in New York. Mangrove Partner's investment goal is to generate positive returns from both long and short investments as opposed to employing a relative value or market hedging strategy. The investment in the fund was valued at \$8.1 million as at 31 December 2024 (\$7.5 million at 2023).
- 3.3 EIL and BICL hold additional liquidity, pending investment, of \$26.4 million and \$0.2 million respectively (2023 - \$6.6 million and \$0.2 million) in cash and cash equivalents in three currencies, namely USD, GBP, and EUR. The income on these investments for year end 31 December 2024 has been immaterial.

The table below shows the investment performance of the year 2024 and 2023, as per unaudited financial statements.

**Table 4–** EHL, EIL and BICL Investment performance as at 31 December 2024 and 2023. USD, in thousands.

Investment performance	EIFlow Holdings Limited		EIFlow Insurance Limited		Beacon Insurance Company Limited	
	2024	2023	2024	2023	2024	2023
Net realised (losses)/gains on financial assets at fair value through profit or loss	(83)	22	(8)	93	(74)	(71)
Net unrealised (losses)/gains on financial assets at fair value through profit or loss	996	2,440	814	2,149	182	292
Investment and other operating income	11,443	1,857	10,995	1,135	398	288
<b>Total income</b>	<b>12,356</b>	<b>4,319</b>	<b>11,801</b>	<b>3,377</b>	<b>506</b>	<b>509</b>

#### 4. Performance of Other Activities

There were no other material activities.

#### 5. Any Other Information

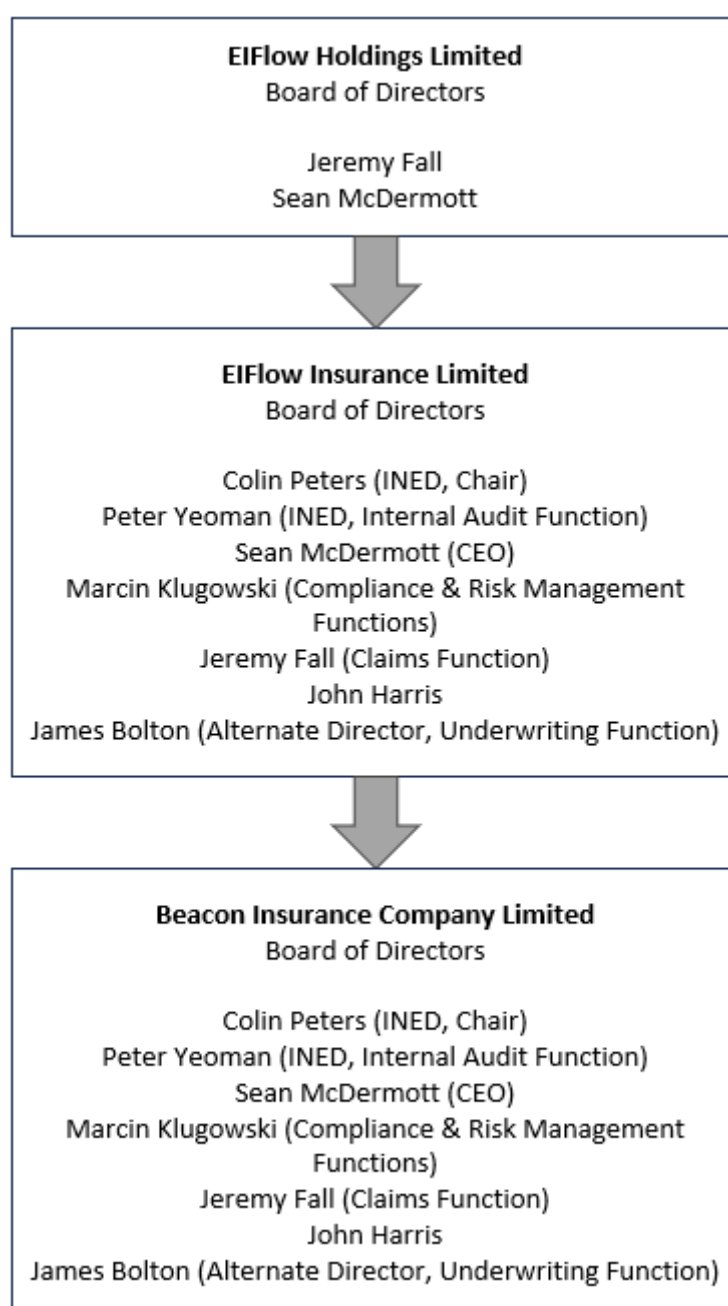
No other material activity to report.

## B. System of Governance

### 1. General Information on the System of Governance

- 1.1 Given the limited nature of business in run-off, the operating structure of the Group is not complex nor is there a large staff requirement to service the insurance companies' needs. Consequently, the Group has no direct employees, and the key activity by the Board is the management of the outsourced functions. Each entity has a Board of Directors that carry responsibility for the oversight of the business and sets its strategy and risk appetite. Most of the Board members are also Directors or representatives of the two outsourced contractors.

**Figure 1** – EHL, EIL, and BICL: Boards of Directors, as at 27<sup>th</sup> May 2025.



- 1.2 The Group has no employees so there is no remuneration policy required.
- 1.3 The Group has no pension commitments or pension liabilities.
- 1.4 The Group outsources certain services as follows:
- EIL and BICL outsourced management services to Quest Consulting (London) Limited.
  - EIL and BICL outsourced management services to Strategic Risk Solutions trading as SRS Europe (formerly Robus Risk Services (Gibraltar) Limited.)
  - EIL and BICL outsourced investment management services to J. Safra Sarasin Group.
  - EIL outsourced insurance management services on its MPI portfolio to Wessex Group.

## 2. Fit and Proper Requirements

- 2.1 The Boards of EHL, EIL and BICL have and will continue to be made up of experienced insurance executives with a collective knowledge of a) insurance and financial markets, b) business strategy and business models, c) systems of governance, d) financial and actuarial analysis and e) regulatory matters. In the event that a Board Director is replaced it is incumbent on the remaining Directors to ensure that any replacement Director ensures that the key skills remain covered by the new Board.
- 2.2 Each insurance company's Board reviews the continued suitability of Directors, as evidenced by:
- Annual Self-Assessment.
  - Regulatory approval of Directors appointments and status.
  - Oversight of outsourced service providers.
- 2.3 SRS Europe co-ordinates compliance activities on behalf of EIL and BICL and maintains an annual self-certification process for the Directors of its client companies. This assists the Group to cover the ongoing fit and proper monitoring requirements.

The Board's review of the continued suitability of Directors to continue is evidenced by:

- Annual Self-Assessment.
  - Regulatory approval of Directors appointments and status.
  - Oversight of outsourced service providers.
- 2.4 The Board of each insurance company is responsible for ensuring individuals meet the regulator's fit and proper tests, prior to appointment, by checking that the person has the qualifications, experience, competence, and capacity appropriate to the relevant function and the Group performs the requisite review to ensure the person is:
- Competent and capable.
  - Acts honestly, ethically and with integrity.

- Financially sound.

## 2.5 Details of each Board members qualifications, skills and expertise are as follows:

### **Colin Peters**

Independent Non-Executive Director, Chair

Colin has worked within the insurance industry since 1987 and specialised in regulatory compliance since 1993. Colin has completed FT's Non-Executive Director diploma which included extensive training in developing the skills and capabilities requires by a Non-Executive Director and has CII qualifications. He first became a director in 2005 and has since been approved to act as a Director for numerous insurance company clients.

### **Pete Yeoman**

Independent Non-Executive Director, Head of Internal Audit

Pete has worked within the Insurance related business since 2003 in Gibraltar and specifically as an INED since 2010, holding various committee roles in Audit, Risk, Compliance, Governance, Underwriting & Claims. Pete completed the IoD Certificate in Company Direction and Non-Exec Directors Award which provided extensive training around the skills and competence required for NED roles.

### **Sean McDermott**

Executive Director, Chief Executive Officer

Sean is a Chartered Accountant and a qualified insolvency practitioner with experience in insurance insolvency and restructuring. Sean is a Director and an ultimate shareholder of Quest Consulting (London) Limited ("Quest"), which provides run-off services to the EHL Group. Sean spent 10 years of his career, immediately prior to setting up Quest Group, at Ernst & Young LLP, one of the top four accounting firms in the world. During this time, he operated in a wide variety of restructuring engagements around the globe all relating directly to the insurance market. Sean has been approved by or holds approved person status with insurance regulators in the UK, Ireland, Gibraltar, Guernsey, Singapore, New York and Bermuda.

### **Jeremy Fall**

Executive Director, Head of Claims

Jeremy is the Chief Executive Officer and an ultimate shareholder of Quest. He is a law graduate and has worked in the insurance market as a claims specialist throughout his career. He is recognised as a leading specialist in his field and acts as an expert witness and an arbitrator in relation to a range of insurance market disputes. Jeremy has been approved by or holds approved person status with insurance regulators in the UK, Ireland, Gibraltar, Guernsey, Singapore, New York and Bermuda. Jeremy has experience in managing complex reinsurance commutations and collections, which is of particular value to EIL.

### **Marcin Klugowski**

Executive Director, Head of Compliance and Risk Management

Marcin is a Fellow of the Association of Chartered Certified Accountants with almost 20 years of experience working in the financial and insurance industry across UK, Malta and Gibraltar. Marcin has been a Board member, Managing Director and CFO as well as a member of various

sub-committees of property and liability insurance company operating across numerous European jurisdictions.

### **John Harris**

Executive Director

John has worked in the insurance industry for the last 37 years, predominantly within global broking houses. John has held numerous senior leadership positions including a global C-Suite position for a significant business at Aon. For much of the last 20 years, he has operated internally at executive management and board level. Externally, much of the work he has performed was in a board advisory capacity supporting and guiding around risk management, crisis management and complex risk and insurance challenges.

### **James Bolton**

Alternate Executive Director, Head of Underwriting

James is a Chartered Accountant and a qualified insolvency practitioner with experience in insurance insolvency and restructuring. James is also a Director and an ultimate shareholder of Quest Consulting (London) Limited ("Quest"), which provides run-off services to the EHL Group.

## **3. Risk Management System including the Own Risk and Solvency Assessment**

### **3.1 Risk Management System**

The risk management system of the Group consists of processes and controls that have been designed by senior management with oversight of the Board of Directors for each of EIL and BICL to identify, measure, monitor and report risks that affect the achievement of our strategic, operational and financial objectives. Since all three regulated insurance entities are in run-off with common management and profiles the risk management systems are largely the same.

Key risks are market risk on the investment portfolios and the risk of future claims deterioration which are not anticipated in claim reserving figures. The investment risk is monitored by management and reported to the Board on a quarterly basis and any deviations from the benchmark performance are explained to the respective Board and remedial action taken if necessary.

The material claims are reviewed by management and any material proposed settlements are reported to the respective Board and approvals sought. The material claims are reported to the Board on a quarterly basis to assess any new information which would result in a change in the claim levels.

### **3.2 Process of Risk Management**

The process of risk management is a continuous and systematic one, comprising five elements:



- **Identification** - The key risks of the business are identified and monitored by the Board. The Board recognizes its ultimate responsibility for the risk management system, setting the risk appetite and risk tolerance limits.
- **Assessment** - The key risks by risk category for each entity are set out in the Risk Register which defines for each risk in each category the likelihood and the potential severity for all the key risks, the risk appetite and the risk tolerance. After the risk analysis is carried out, risks are graded in terms of importance. This helps the Board consider the risk appetite and risk tolerance parameters.
- **Response** – All risks are dealt with as and when they arise by the responsible Director or by the Board. Decisions are detailed in the minutes of the relevant Board meeting and the risk register updated accordingly.
- **Monitoring** – At each quarterly Board meeting the Board, led by the Director in charge of the risk management function, considers what changes there are to the risk profile of the business and if any new risks have been identified. Given the business is run-off there is no new business so it is very unlikely there will be a new risk identified for any of the insurers which are all in run-off. More likely is that something has changed in relation to the business that might trigger an increase or decrease in an already identified risk.
- **Reporting** - Reporting includes risk and internal controls, summary of risk assessments, risk appetite monitoring, internal control performance, incident reporting and status of actions with respect to incidents, risks and controls.

### 3.3 Own Risk and Solvency Assessment (ORSA)

For EIL and BICL the ORSA process starts with its business strategy which, as a run-off insurer, has a very simple business model with a very limited range of risk. The nature of the run-off in terms of quantum and volatility dictate the capital required which then feeds into the regulatory and economic capital requirements of the Company. The nature of the business also dictates the risk appetite and risk tolerance of the Company. The Board of each insurer, considering these factors, sets out the key Risk Management Policies and Systems of Governance for EIL and BICL respectively. Separate reserve approaches are adopted for each of EIL and BICL reflecting the nature of the underlying claims as follows:

- EIL - As the business of EIL remains relatively static from year to year, a triennial review of the process is sufficient for the needs of EIL except where there is a substantial change brought about by the introduction of a new portfolio of business. Similarly, the nature of run-off business that is largely 25+ years old with no active underwriting means that there is limited value in operating complex internal modelling to make its business decisions. This is consistent with the principles of proportionality as set out in Guideline 4 of EIOPA CP 13/09.
- BICL – BICL’s current liabilities relate to stable 2022 and post aviation portfolio and the June 2024 independent actuarial review concluded that the portfolio could be expected to be fully developed. BICL intends to adopt a similar triennial policy to its parent, EIL, subject to an agreement with the GFSC.

The ORSA process for each insurer is an iterative one where each of the above factors influences the other (e.g. the greater the risk tolerance the greater is the capital required).

The ORSA process is conducted annually, in compliance with regulatory requirements, by the Director in charge and reviewed and approved by the respective Board. The process by which the ORSA is conducted is reviewed periodically. This will be the earlier of a) once every 3 years (given the portfolio of business will not change) or b) where there is a substantial change in the business through the addition of new portfolios of run-off business resulting in a material change to the profile of the insurance business or time horizon.

The Board of each insurer adopts an integrated approach whereby the Business Strategy, Capital Management, Risk Management Policy and Risk Tolerance all interact. For example, the release or increase in capital is dictated by the business strategy and the addition of insurance legacy portfolios. Similarly, the risk tolerance levels set by the Board are also dictated by the level of capital relative to the SCR.

## 4. Internal Control System

### 4.1 Internal Control System

The Group operates a flat structure for each insurance company with a Board of Directors managing the key outsourced contracts. All payments have dual signature requirements with one local Gibraltar signatory and one Quest Director as signatories. Similarly, with respect to claims reserve movements, the Director responsible for claims signs off on all claims reserve movements. The control environment is appropriate and proportional to the business needs of each of the two insurers, EIL and BICL.

### 4.2 Compliance Function

SRS Europe co-ordinates compliance activities on behalf of the Group and implements an annual self-certification process for the Directors of client companies.

For each insurer a single Board member has overall responsibility for the compliance function. This is a Gibraltar based Director with local expertise and knowledge of the compliance requirements as set down under Gibraltar company law, GFSC guidance and EU regulations including Solvency II.

The role of SRS Europe in the compliance function is to:

- Assist the Board with ensuring ongoing compliance with legislative requirements.
- Enhance the Group's awareness of compliance matters.
- Document any breaches identified, how they were addressed and whether any third-party reporting of the breach is required.
- Ensure that the Board of the respective insurer is kept informed of any amendment to the applicable regulations, legislation and guidelines or the addition of any new requirements and the potential impact on the Group.

## 5. Internal Audit Function

As already noted, the Group is not a complex business. For EHL, the Board is satisfied that due to low activity, no internal audit function is required. The audit performed annually by external auditors sufficiently discharges all EHL audit requirements.

For EIL and BICL, the internal audit approach involves auditing the performance of the outsourced service contracts by parties independent of those contracts. This is undertaken to ensure that there is (as far as possible) a third-party review of the performance of each outsourced contract against its contracted objectives. Findings from the audit reviews are reported to the respective Board. The internal reviews outlined are sufficient and proportional given EIL or BICL are not underwriting and have only a small number of activities, transactions and personnel involved in the business processes.

The Group utilises both internal and external resources for the internal audit function. From 01 January 2016, the Group appointed an external firm to oversee and participate in the internal audit function. In addition, the Board has appointed Quest's Head of Internal Audit, Mr Karl Floyd, to oversee and manage the internal audit role.

## 6. Actuarial Function

The actuarial function holder reports directly to each Board. The reserving tasks of the actuarial function are outsourced to an independent actuarial consultant. The key function holder is also responsible for overseeing this outsourced relationship including monitoring the scope of the work, service levels and challenging the results.

The actuarial function for each insurance entity is responsible for:

- a) Co-ordination of the calculation of the technical provisions.
- b) Ensuring the accuracy of the data presented to the independent actuarial consultant.
- c) Ensuring the appropriateness of the methodologies and assumptions used in the calculation of technical provisions.
- d) Comparing best estimates against experience.
- e) Informing the Board of the adequacy and reasonableness of the calculation of technical provisions.

EIL is not underwriting any new business such that periodic reviews as required by the GFSC once every three years by an external actuary are considered sufficient by the Board for the needs of EIL.

BICL has a stable portfolio of aviation business which was reviewed in June 2024. Hence the only actuarial work undertaken for year end is the mandatory annual review of the Swiss branch confirming there are no reported claims.

The services of an independent actuarial consultant will be utilised, a) when there is an acquisition of a new portfolio, b) where there is a periodic review as required under the GFSC licence terms, or c) where there is a material change in the claims profile as determined by the

Claims Director such that an interim updated actuarial report should be required. Willis Towers Watson carried out an actuarial review on reserves in June 2024 on data as at 31 December 2023, the results were incorporated into the annual audited accounts and have been carried forward into the 2024 year-end technical provisions.

## 7. Outsourcing

### 7.1 Outsourcing policy of EHL, EIL and BICL

The outsourcing policy of EHL, EIL and BICL is summarised as follows:

- The Group Board considers the appropriateness of all outsourcing activities.
- All outsourced functions subject to bi-annual review for compliance and performance assessment with findings reported to the respective Board.
- Written agreements to have a clear fee structure including termination provisions in the event of non-performance or insolvency.

### 7.2 Services Outsourced and Jurisdiction

The main insurance activities of EIL and BICL are carried out under three key outsourced contracts:

- The local insurance managers from SRS Europe who provide company secretarial, compliance, accounting, risk management and solvency calculation support and compliance support in Gibraltar.
- Quest Consulting in London provides the claims management and reinsurance collection activities.
- Bank J. Safra Sarasin, a Swiss private bank with an office in Gibraltar, provides the investment management activities for each insurance entity under the supervision of the respective Board.
- Wessex Group who manages the MPI portfolio on behalf of EIL.

## 8. Adequacy of the System of Governance

The Group carries out a very limited range of activities. The run-off nature of EIL and BICL, each with a known portfolio of liabilities means that frequent internal reviews of its systems are not required. It is considered that a review once every three years is therefore sufficient. In the event that further books of business are acquired that materially alter the characteristics of one of the insurance entities, then the potential need for an earlier review will be considered at that time.

The Group is satisfied that it has the systems in place to proportionately meet the requirements of the group's systems of governance and Articles 43-50 and 223 of the Solvency II Act in Gibraltar.

## 9. Any Other Information

### Related Party Transactions

Apart from balances and transactions disclosed elsewhere in this report, there were the following significant transactions with related parties per the unaudited consolidated financial statements:

**Table 5** – EHL, EIL and BICL Transactions with related parties as at 31 December 2024 and 2023. USD, in thousands.

	ElFlow Holdings Limited		ElFlow Insurance Limited		Beacon Insurance Company Limited	
	2024	2023	2024	2023	2024	2023
SRS Europe	195	334	97	117	98	94
Quest Consulting (London) Limited	1,764	1,322	1,470	1,029	294	167
Wessex Group	214	-	214	-	-	-
<b>Total</b>	<b>2,173</b>	<b>1,656</b>	<b>1,781</b>	<b>1,146</b>	<b>392</b>	<b>261</b>

## C. Risk Profile

The Board considers there to be no significant risk concentrations as defined by art. 376 of the commission delegated regulation (EU) 2015/35. The Group's risk profile can be considered in two distinct parts, risks to EHL as a holding company and risks to EIL and BICL as run-off insurance companies.

For EHL, there is only investment risk associated with the restricted cash held at a local bank in Gibraltar.

EIL and BICL carry out no new underwriting and so their underwriting risk exposure is linked only to the variation or extension of risks already attaching as part of the run-off, the adequacy of the claim reserves, and the associated operational risk linked to the validation of claims for settlement. The other key risks to which EIL or BICL are exposed arise from the investment portfolios. These risks include market risk (interest rate and currency risk) and credit risk.

EIL or BICL's claims portfolios are not active and the expense profile is very clear and so the liquidity risk is negligible.

As run-off insurers, EIL and BICL have a very simple business model with a very limited range of risks.

## 1. Underwriting Risk

EIL or BICL's insurance business assumes the risk of loss from persons or organisations that are directly exposed to an insurance policy. Insurance risk arises from this risk transfer due to inherent uncertainties about the occurrence, amount and timing of the insurance liabilities following an insured loss. EIL or BICL have no appetite for new underwriting risk and have not entered into any new contracts of insurance that involve material exposure to live risks.

The three key components of insurance risk for an insurer in run-off are reserving, claims management and reinsurance risk. Each risk is considered below in relation to EIL or BICL.

### 1.1 Reserving Risk

In establishing reserves, the management of EIL includes amounts for IBNR reserves supported by an independent actuarial review from a firm of specialist actuarial consultants to ensure that all reported claims are adequately provided for. For BICL the amount for IBNR reserves is currently provided directly by the cedant. Reserving risk occurs within the insurance company where established insurance liabilities are insufficient through inaccurate forecasting, or where there is inadequate allowance for expenses and reinsurance bad debts within those provisions. The reserves of EIL and BICL are quantified periodically through an internal assessment of the reported claims reserves at each quarter end. Additionally, at suitable intervals or points of significant change, external actuarial reports which consider both the best estimate reserves and estimating reserves at higher confidence levels. Outstanding Claims Reserves are reviewed on a quarterly basis to ensure that all reported claims are adequately provided for. The results are disclosed in the respective Board packs at quarterly meetings and are discussed and formally approved at each entity's Board meeting.

Using the SII standard formula, reserving risk comprises of \$8.3 million (2023 - \$4.8 million) of the Group's total Group Solvency Capital Requirement of \$14.1 million (2023 - \$8.7 million) as at 31 December 2024.

### 1.2 Claims Management Risk

Claims Management Risk may arise within each insurance company in the event of inaccurate or incomplete case reserves and claims settlements, poor service quality or excessive claims handling costs. Inaccurate calculation and reporting of claims case reserves may lead to under or over estimation of IBNR. Hence there is a great focus on data quality to produce an accurate record of updated claims.

Careful monitoring and supervision with the direct involvement of a Board member is key to mitigating Claims Management Risk. Claims management is a core part of the business and due to the limited nature of the business major claims are reported to and considered at Board level of the relevant entity; this further mitigates the risk.

### 1.3 Reinsurance Risk

Reinsurance risk for the Company arises where reinsurance contracts put into place to reduce gross insurance risk do not perform as anticipated, result in coverage disputes or prove inadequate in terms of the vertical or horizontal limits purchased. Each of the insurers has a different reinsurance profile.

The Preserve and Pinnacle portfolios in EIL are predominantly UK motor and all claims above a GBP500,000 or GBP £1 million excess points are 100% reinsured including the PPO claims. This means the net exposure is capped. Reinsurance security is assessed regularly and all reinsurance is of a very high quality.

Other than the Preserve and Pinnacle portfolios, EIL and BICL have no material ongoing outwards reinsurance on its main portfolios; however, EIL has an agreed claim in the liquidation of a former Swiss insurer, Universale Ruck.

We measure reinsurance risk by reference to the collectability of the reinsurance balances due from EIL's remaining reinsurance asset. Estimates are produced to predict the likely recoverable amounts from this reinsurer and a relatively prudent asset is provided for in the balance sheet. The Directors remain in close contact with the reinsurer, and dialogue is maintained at least annually.

## 2. Market Risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate as a result of market factors. Market factors include currency risk and interest rate risk.

Using the SII standard formula, market risk for the Group comprises:

**Table 6** – EHL, EIL and BICL Solvency Capital Requirement, Market risk as at 31 December 2024 and 2023. USD, in thousands.

Market Risk	EILFlow Holdings Limited		EILFlow Insurance Limited		Beacon Insurance Company Limited	
	2024	2023	2024	2023	2024	2023
Interest rate risk	750	722	194	262	577	554
Equity risk	4,230	3,768	5,265	4,811	-	-
Spread risk	2,068	1,052	1,971	1,052	662	700
Currency risk	1,029	775	560	752	152	78
Concentration risk	99	76	24	-	55	60
Property Risk	-	61	-	-	-	61
Diversification between Market Risk submod	(1,448)	(1,458)	(971)	(980)	(502)	(502)
<b>Total Market Risk post diversification</b>	<b>6,728</b>	<b>4,996</b>	<b>7,043</b>	<b>5,897</b>	<b>944</b>	<b>951</b>

## 2.1 Spread Risk

Spread Risk is the risk that the value of investments reduces due to a reduction in the perceived creditworthiness of the issuers of the debt instruments. The Group actively seeks to mitigate spread risk by only investing in assets that are investment grade government and corporate bonds or equivalent and by diversifying the portfolio. There is a limited exposure to any one issued bond as they are limited to 5% of assets rated A- or better and to 3% of assets rated BBB+ or lower. Exposure to Government and Supranational is not limited.

## 2.2 Currency Risk

Currency risk relates to the Group operating in different currencies and converting non-USD earnings at different points in time at different foreign exchange levels when adverse changes in foreign currency exchange rates occur. The Group seeks to mitigate currency risk by matching the currency assets held to the currency liabilities recognised. The exposure of the Group to currencies other than the reporting currency is very limited.

## 2.3 Interest Rate Risk

Interest rate risk is the potential for financial loss caused by fluctuations in fair value or future cash flows of financial instruments because of changes in market interest rates. The portfolio managers have a discretionary mandate that allows the use of derivative instruments to hedge duration risk and to help mitigate the adverse impact on the portfolio value arising from interest rate rises.

## 2.4 Credit Risk

Credit risk is the risk of financial loss to EHL, EIL or BICL if a client or counterparty to a financial instrument is unable to pay in full amounts when due and arises from the Group's held-to-collect-and-sell investments, loans and receivables, cash and cash equivalents and financial liabilities at fair value through profit or loss.

The credit risk that the Group is exposed to relates only to investment of the assets. These assets are invested in investment grade government and corporate bonds or equivalent. The portfolio is well diversified so that there is a limited exposure to any one issue to 5% of assets rated A- or better and to 3% of assets rated BBB+ or lower. Exposure to Government and Supranational is not limited.

Investments are spread across a wide diversified range of instruments to reduce the credit risk exposure to any one counterparty. Non-rated investments are only held where such instruments are in liquid form and are assessed as being of investment grade. EIL has no experience of defaults on its investment portfolio.

## 2.5 Liquidity Risk

Liquidity risk arises if the Group is unable to realize investments and other assets in order to settle financial and claim obligations when they fall due or that the Group would have to incur excessive cost to do so.



The insurance companies' claims portfolios are largely not active and the expense profile is very clear, and therefore the liquidity risk is low. EIL and BICL are not complex businesses and are all focused on run-off only. Claims activity can be accurately forecast several months ahead so that all the liquidity needs can be proactively managed as they arise.

As the operating costs are managed through outsourced agreements with Quest, SRS Europe and JSS, EHL and the insurance entities have clear visibility on the upcoming operating costs under fixed quarterly fee arrangements.

In the unlikely event of short-term liquidity issue, the investment portfolio is highly liquid and could be converted to cash at short notice with minimal additional cost.

### 3. Operational Risk

Operational risk is the risk of losses due to deficiencies or errors in processes and systems, whereas business risk is the risk of losses due to external factors such as the market situation or government regulations. The Board of each insurance company monitors the operational risk by monitoring the business systems, including the use of outsourced functions and promptly responding to any identified deficiencies. The Board reviews the situation periodically and considers that the benefits significantly outweigh the disadvantages in outsourcing its primary functions.

### 4. Risk Concentration

There are no material risk concentrations. The legacy portfolios are a diverse portfolio of international insurance and reinsurance risks so there is no concentration risk in underwriting activities either within one insurer or across the insurance Group as a whole.

The investment portfolio is spread across a range of investments so there is no risk concentration risk associated with investments.

### 5. Risk Mitigation

In addition to the techniques used to mitigate risks described above, the use of Quest's expertise in London is used to validate claims and commute risks where this can be achieved on terms acceptable to EIL or BICL. The Group is always looking to add additional legacy portfolios particularly where such portfolios help reduce and diversify the legacy exposure across other classes of business.

On the investments side, the Board of each insurance company limits the investment of assets as described above and limits investments to highly rated or equivalent investment grade bonds. Further, each insurer currency matches liabilities with investment of assets in the same currency (in particular USD where much of the exposure lies). In this way both market risk and credit risk are mitigated as far as possible. Preserve's claims liabilities are predominately GBP

as is the reinsurance asset and a certain amount of GBP funds are held to mitigate the GBP claims exposure.

## 6. Stress Testing and Sensitivity Analysis

Sensitivity and stress testing reported in this section refers to EHL Group. Tests presented in this section were based on assets and liabilities as at 31 December 2024.

Using SII standard formula, a number of tests to assess the impact on available capital in stress event scenarios have been performed. The stress tests performed attempt to capture the key risks identified to EHL Group, by considering the particular asset and liability elements of each subsidiary company, and by design, stress a worst-case scenario. The stress tests and the results of stress testing are shown below by category.

**Table 7** - Sensitivity and stress testing at 31 December 2024. USD, in thousands.

Scenario	SCR	MCR	SII excess of assets over liabilities	SCR Coverage
<b>Base line</b> (actual Dec-24)	14,119	4,140	45,849	325%
<b>Underwriting risk</b> - Reserve risk	17,532	4,140	28,489	162%
<b>Market risk</b> - Investment shocks				
- interest rate +100 bps	14,043	4,140	45,849	326%
- interest rate -100 bps	14,157	4,140	45,849	324%
- collective investment < 20%	13,551	4,140	44,217	326%
<b>Counterparty risk</b>				
- credit rating 1 step downgrade	15,129	4,140	45,849	303%
- credit rating 2 steps downgrade	17,088	4,140	45,849	268%
<b>Severe scenario</b>	18,315	4,140	35,637	195%

A more detailed description of the various stress tests and observations on the impact of those tests follows:

- **Reserving Risk Test** - a stress test whereby non-life-long tail (EIL) technical provisions increase by 50%, non-life short tail (EIL and BICL) technical provisions increase by 25% and non-life ATE (EIL) technical provisions increase by 100%. Additionally, for the EIL Preserve portfolio, an increase in inflation was also modelled on Life technical provisions (an increase of 2% from the inflation rate in the base calculations).

As mentioned above, during 2024 EIL completed a portfolio transfer with Pinnacle Insurance plc (Pinnacle) covering all non-life non-pet insurance previously underwritten by Pinnacle which includes 4 motor PPOs which are protected by quality reinsurance. The liabilities in respect of these PPOs form the bulk of liabilities of the transferred business. The PPO liabilities are assessed using a cashflow model and to stress these liabilities, the long-term real inflation rate used was increased by 2%. The other liabilities in the transferred portfolio are relatively short tail in nature and so were increased by 25%.

The effect of these stress tests is that EHL's SCR coverage reduces to 162% from 325%.

- **Market Risk, Investment Shocks** - two types of tests were performed on the investments of EIL and BICL, a first one assuming interest rate shocks and a second one assuming a decrease in the value of collective investments:
  - **Interest rate shocks** – two tests were carried out, one to evaluate the impact on the investments of an increase of 100 bps of the interest rate and one to assess the impact of a 100 bps decrease of the interest rate. Results show that only in the event of a decreased interest rate does EHL's SCR coverage reduce.
  - **Collective investments value decrease** - a test whereby the value of EIL's investments in hedge funds decrease by 20%. This test results in an increase to SCR coverage despite a loss to the asset base, a consequence of the change in large SCR charge applied to the collective investment in the first instance.
- **Counterparty Risk - Credit Default** - two tests were performed. A stress test where all debt securities experience a 1 notch downgrade was performed and a stress test where all debt securities experience 2 notches downgrade. We note that the likelihood of these events happening to all EHL's investments at the same time is extremely remote. The most extreme of these two tests reduces the SCR coverage from 325% to 268%.
- **Severe Scenario** - a severe scenario stress test was carried out assuming that the weakening of general economic conditions would cause a loss in the investments comparable to the stress test interest rate shock and a deterioration of the credit rating of the counterparties of the Company. In this context, the Company is advised of a large claim which is modelled as having an effect comparable to the entire Reserving risk test presented above. This scenario, deemed very extreme, shows that EILow will remain profitable and solvent with SCR coverage modelled to reduce to 195%.

Given the proportionally large excess of assets above SCR, the SCR coverage remains above 160% in all stress testing scenarios presented.

## 7. **Other Material Risks**

Following the development of a significant number of cases of the Coronavirus ("Covid-19") across the world, a public health emergency of international concern was declared in January 2020. However, given that the Group's insurance portfolios are in run-off, the Directors continue to assess that the impact of Covid-19 on EHL has been limited. The main impact was limited to the progress made on certain claims, due to delays in medical appointments and to the Court timetables, which have now largely been addressed. The Directors consider that accordingly there will be no impact on the assessment of IBNR. The Company's Board and management team continue to carry out their duties while the business continuity plans for the outsourced service providers has ensured continuity of these services.

## D. Valuation for Solvency Purposes

To ensure reporting continuity across the EHL Group, the financial statements for the year ended 31 December 2020 and subsequent for each insurance entity are prepared in accordance with the Financial Services (Insurance Companies) Regulations 2020 and the Financial Services (Insurance Companies: Accounts Directive) Regulations 2020, both of which came into force on 15 January 2020. GFRS accounting policies have also been adopted across the entire Group.

- 7.1 Cash and Equivalents – cash and cash equivalents consist of deposits in banks and short-term investments with original maturities of three months or less. Included within cash at bank are margin accounts which represent margin deposits held in respect of open exchange-traded futures contracts. They are valued at their book value.
- 7.2 Financial Investments – Non-derivative financial assets are classified as financial assets at fair value through profit or loss and comprise investments in equity instruments and debt securities, including the Company's investment in a private company. These instruments are carried at fair value.
- 7.3 Loans and Receivables – These assets are non-derivative financial assets resulting from the delivery of cash or other assets by a lender to a borrower in return for a promise to repay on a specified date or dates, or on demand. They are initially recognised at fair value plus transaction costs that are directly attributable to their acquisition or issue and subsequently carried at amortised cost, using the effective interest rate method, less any impairment losses.

## 8. Technical Provisions

- 8.1 Generally, provision is made for the estimated unpaid amounts of losses and loss expenses arising from incidents reported to the Company during the year, together with a provision for losses incurred but not yet reported (IBNR). The IBNR is based on past experience using the latest available information and management best estimates of the probable number and nature of claims arising from incidents not yet reported. The methods of making such estimates and the resulting reserves established are continually reviewed and updated. Any adjustments resulting therefrom are reflected in earnings in the year in which they became known and such adjustments could be material.
- 8.2 EIL acts as an insurer and reinsurer of companies which are subject to claims arising from environmental property damage and the clean-up of toxic waste disposal sites. In a large number of instances, the Company has been advised that a potential for claims against the insured exists, but the insured and reinsured are only partly in a position to quantify the amounts involved. There are various potential interpretations of the coverage provided by the underlying contracts. In addition, it is probable that all insured claims have not yet been reported. As a result, the potential exposure to loss varies significantly over a wide range of values.
- 8.3 Adjustments have been made to transit from GAAP accounts to Solvency II ("SII") best estimate technical provisions.

The SII Best Estimate represents a probability-weighted average of future cash flows, discounted using the EIOPA risk-free interest rate term structure. The probability weights were based on the Towers Watson actuarial estimates for the main portfolio in EIL and shorter tail management estimates in respect of all other business.

The loss data underlying the calculation of insurance reserves as reported in the financial statements of each insurance entity is the same as that used to calculate the technical provisions. Estimates of each insurance entity's aggregate technical provisions have been developed separately for loss reserves and the risk margin.

All insurance entities are in run-off. No premium provision including any provision for Bound But Not Incepted (BBNI) business is required. The allowance for Events Not In Data Set (ENIDs) is based on an explicit loading to the gross reserves for each entity. The loading is based on a benchmarking analysis.

The best estimate is calculated separately for cash flows in different currencies (Commission Delegated Regulation EU 2015/35, Art. 33) and discounted according to the relevant yield curve.

The best estimate of the net technical provisions includes a provision for unallocated loss adjustment expenses (ULAE). For Solvency II purposes, the total future anticipated expenses of EIL at \$1.4 million are included as provided in the independent actuarial review.

The risk margin was estimated based on projections of KPMG standard formula capital at future evaluation dates and a 6% cost of capital as prescribed by EIOPA.

Insurance and intermediaries' receivables not past-due are netted off the technical provisions for Solvency II purposes. Reinsurance receivables not past-due are reclassified as part of the reinsurance share of technical provisions for Solvency II purposes.

Insurance and Intermediaries payables not past-due form part of the Solvency II technical provisions. Reinsurance payables not past-due form part of the Solvency II technical provisions.

On the reinsurance recoverables, the net expected losses due to counterparty default were estimated using the simplification (Art. 61 Commission Delegated Regulation (EU) 2015/35) that allows the adjustment to be based on an estimate of the one-year probability of default multiplied by the duration of the recoverable. The one-year probability of default was taken from EIOPA guidelines but was also determined based on both a study performed by S&P on the probability of default of similarly-rated bonds and on management judgement.

A summary of reclassifications and adjustments of assets and liabilities relating to the technical provisions are reported below for each insurance entity. Due to the simple structure of the business, these adjustments provide the full reconciliation between GAAP and Solvency II accounts.

**Table 8** – EIL Summary of transition from GAAP to Solvency II items as at 31 December 2024 and 2023: a reconciliation. USD, in thousands.

2024	Statutory accounts value	Reclassification for Solvency II purposes	Solvency II Valuation adjustment	Solvency II value
<b>Assets</b>				
Reinsurance recoverables	13,470	-	1,529	14,999
Insurance and intermediaries receivables	7,902	-	0	7,902
Prepayments & DAC	291	(206)	0	85
Other assets	72,563	0	0	72,563
<b>Total Assets</b>	<b>94,226</b>	<b>(206)</b>	<b>1,529</b>	<b>95,549</b>
<b>Liabilities</b>				
Technical provisions	50,484	-	(1,926)	48,558
Risk margin	-	-	1,148	1,148
Insurance & intermediaries payables	2,934	-	-	2,934
Reinsurance payables	-	-	-	-
Other liabilities	816	-	(72)	744
<b>Total Liabilities</b>	<b>54,234</b>	<b>0</b>	<b>(850)</b>	<b>53,384</b>
<b>Net assets/Own Funds</b>	<b>39,992</b>	<b>(206)</b>	<b>2,379</b>	<b>42,165</b>

2023	Statutory accounts value	Reclassification for Solvency II purposes	Solvency II Valuation adjustment	Solvency II value
<b>Assets</b>				
Reinsurance recoverables	-			-
Insurance and intermediaries receivables				-
Reinsurance receivables	2,173		(1,055)	1,118
Other assets	56,771	(1)	1	56,771
<b>Total Assets</b>	<b>58,944</b>	<b>(1)</b>	<b>(1,054)</b>	<b>57,889</b>
<b>Liabilities</b>				
Technical provisions	22,401	-	(6,612)	15,789
Risk margin	-	-	631	631
Insurance & intermediaries payables	2,730	-	-	2,730
Reinsurance payables	-	-	-	-
Other liabilities	5,785	(1)	0	5,784
<b>Total Liabilities</b>	<b>30,916</b>	<b>(1)</b>	<b>(5,981)</b>	<b>24,934</b>
<b>Net assets/Own Funds</b>	<b>28,028</b>	<b>0</b>	<b>4,927</b>	<b>32,955</b>

**Table 9** – BICL Summary of transition from GAAP to Solvency II items as at 31 December 2024 and 2023: a reconciliation. USD, in thousands.

2024	Statutory accounts value	Reclassification for Solvency II purposes	Solvency II Valuation adjustment	Solvency II value
<b>Assets</b>				
Reinsurance recoverables	-	-	-	-
Insurance and intermediaries receivables	-	-	-	-
Prepayments	20	-	(20)	-
Other assets	11,719	-	-	11,719
<b>Total Assets</b>	<b>11,739</b>	<b>-</b>	<b>(20)</b>	<b>11,719</b>
<b>Liabilities</b>				
Technical provisions – non-life (excluding health)	4,547	-	(720)	3,827
Risk margin	-	-	107	107
Insurance & intermediaries payables	308	-	-	308
Reinsurance payables	-	-	-	-
Other liabilities	60	-	-	60
<b>Total Liabilities</b>	<b>4,915</b>	<b>-</b>	<b>- 613</b>	<b>4,302</b>
<b>Net assets/Own Funds</b>	<b>6,824</b>	<b>-</b>	<b>593</b>	<b>7,417</b>

2023	Statutory accounts value	Reclassification for Solvency II purposes	Solvency II Valuation adjustment	Solvency II value
<b>Assets</b>				
Reinsurance recoverables – non-life (excluding health)	-	-	-	-
Insurance and intermediaries receivables	-	-	-	-
Prepayments	20	-	(20)	-
Other assets	12,560	-	-	12,560
<b>Total Assets</b>	<b>12,580</b>	<b>-</b>	<b>(20)</b>	<b>12,560</b>
<b>Liabilities</b>				
Technical provisions – non-life (excluding health)	5,402	-	(485)	4,917
Risk margin	-	-	191	191
Insurance & intermediaries payables	-	-	-	-
Reinsurance payables	-	-	-	-
Other liabilities	501	-	-	501
<b>Total Liabilities</b>	<b>5,903</b>	<b>-</b>	<b>- 294</b>	<b>5,609</b>
<b>Net assets/Own Funds</b>	<b>6,677</b>	<b>-</b>	<b>274</b>	<b>6,951</b>

8.4 The SII net technical provisions were estimated at \$15.3 million and \$5.1 million for EIL and BICL respectively as at 31 December 2023 (2023 - \$15.3 million and \$5.1 million). A comparison of the net technical provisions as per GAAP and as per SII is presented below.

**Table 10** – EIL and BICL GAAP and Solvency II Net Technical Provisions as at 31 December 2024 and 2023: a reconciliation. USD, in thousands.

	ElFlow Insurance Limited		Beacon Insurance Company Limited	
	2024	2023	2024	2023
<b>Net technical provisions</b>	<b>37,014</b>	<b>20,176</b>	<b>4,547</b>	<b>5,402</b>
ULAE increase for SII	551	402	-	142
Provision for ENID's	481	205	-	-
UPR adjustment	(884)	(921)	-	1
Discounting	(3,603)	(5,239)	(719)	(629)
<b>Discounted technical provisions</b>	<b>33,559</b>	<b>14,623</b>	<b>3,828</b>	<b>4,916</b>
Risk Margin	1,148	631	107	191
<b>SII Net Technical Provisions</b>	<b>34,707</b>	<b>15,254</b>	<b>3,935</b>	<b>5,107</b>

8.5 The key areas of uncertainty associated with the value of technical provisions across the two regulated entities are as follows:

- Estimation of the Outstanding Loss Reserves (OLSR) - the uncertainty is around the assessment of settling claims.
- Estimation of claims Incurred But Not Reported (IBNR) - the uncertainty is due to the fact that the nature of the claims is not known at time of reserving.
- Estimation of Events Not In Data (ENIDs) - the uncertainty lies in the fact that an estimation is made for events not observed.
- Run-off expenses provision - the estimation is inherently uncertain due to the evaluation of the base costs, inflation, period of the run-off.
- Risk margin - it is uncertain due to the requirement to forecast future solvency capital requirement over the period of a run-off.

8.6 The insurance entities have not applied the matching adjustment, volatility adjustment, transitional risk-free interest term structure or the transitional deduction in calculating their respective technical provisions.

8.7 The reinsurance contracts on the EIL Preserve and Pinnacle Motor Businesses are excess of loss in nature and provide coverage on the major losses that have impacted the reinsurance excess point. No other losses are projected to impact the reinsurance.

## 9. Other Liabilities

9.1 As EIL and BICL do not underwrite new live business the liabilities are substantially claims reserves and ledger balances. Claims reserves for agreed valid claims are booked as reported and authorised by the respective Claim Director. IBNR reserves are based on the most recent



external actuarial valuation where appropriate and approved by the actuarial function holder and are recorded at best estimates.

- 9.2 Expenses are substantially the quarterly fees of the two service contracts which are fixed contractual figures and hence there are very limited non-insurance assets or liabilities in the balance sheet.
- 9.3 No additional adjustments were required for Solvency II purposes other than to include accrued interest within the valuation of the bonds.

## E. Capital Management

### 1. Own Funds

- 1.1 The Group has a simple capital structure involving Share Capital, Share Premium account. Available for sale reserve and P&L reserves only for each company where applicable. The P&L and Available for sale reserves support the capital and SCR/MCR, and the P&L Reserves surplus above this is available for distribution subject to Board and GFSC approval. The policy of each insurance entity is to review future capital needs and only seek release of surplus to the parent company once satisfied there is excess capital where there are no further investment opportunities.
- 1.2 For the purpose of calculating Group solvency, method 1 - default accounting consolidation-based method has been used (Article 199 of the Financial Services (Insurance Companies) Regulations 2020).

The eligible amount of own funds to cover the Solvency Capital Requirement and the Minimum Capital Requirement classified by Tier are detailed in the table below.

**Table 11** – EHL, EIL and BICL Solvency II Own funds classified by Tier, as at 31 December 2024 and 2023. Solvency II values in USD, in thousands.

Own fund items	Tier	EIFlow Holdings Limited		EIFlow Insurance Limited		Beacon Insurance Company Limited	
		2024	2023	2024	2023	2024	2023
Share capital	1	9,902	9,902	12,100	12,100	11,214	11,214
Share premium	1	-	-	-	-	-	-
Reconciliation reserve	1	35,946	26,116	30,065	20,855	(3,797)	(4,263)
Own Funds		45,848	36,018	42,165	32,955	7,417	6,951

- 1.3 The transition from the statutory balance sheet to SII balance sheet generates small differences between the equity as shown in the financial statements and the excess of assets over liabilities calculated for Solvency II purposes. This difference is due to SII adjustments to the technical provisions and non-material adjustment to the assets. The adjustments are generated from the application of the EIOPA SII rules relating to the technical provisions.

### 2. Solvency Capital Requirement and Minimum Capital Requirement

- 2.1 The EHL group SCR as at 31 December 2024 was \$14.1 million (2023 - \$8.7 million) and the MCR was \$4.1 million (2023 - \$4.4 million). The SII Own funds to SCR ratio was 325% (2023 - 417%).
- 2.2 The amount of the Group's Solvency Capital Requirement split by risk resulting from the application of the standard formula is shown in Table below:

**Table 12** – EHL, EIL and BICL Solvency Capital Requirement classified by risk modules as at 31 December 2024 and 2023. USD, in thousands.

Risk modules	EiFlow Holdings Limited		EiFlow Insurance Limited		Beacon Insurance Company Limited	
	2024	2023	2024	2023	2024	2023
<b>Solvency Capital Requirement</b>	<b>14,117</b>	<b>8,729</b>	<b>13,497</b>	<b>8,383</b>	<b>1,903</b>	<b>2,222</b>
Operational Risk	1,232	602	1,118	454	115	147
<b>Basic Solvency Capital Requirement</b>	<b>12,885</b>	<b>8,127</b>	<b>12,379</b>	<b>7,929</b>	<b>1,788</b>	<b>2,075</b>
Diversification between UW, CDR and Market Risk modules	(4,196)	(2,549)	(4,105)	(2,319)	(487)	(533)
<b>Market Risk post diversification</b>	<b>6,728</b>	<b>4,996</b>	<b>7,043</b>	<b>5,897</b>	<b>944</b>	<b>951</b>
Diversification between Market Risk submodules	(1,448)	(1,458)	(971)	(980)	(502)	(502)
Interest rate risk	750	722	194	262	577	554
Equity risk	4,230	3,768	5,265	4,811	-	-
Property risk	-	61	-	-	-	61
Spread risk	2,068	1,052	1,971	1,052	662	700
Currency risk	1,029	775	560	752	152	78
Concentration risk	99	76	24	-	55	60
<b>Counterparty default risk</b>	<b>1,668</b>	<b>618</b>	<b>1,620</b>	<b>525</b>	<b>73</b>	<b>85</b>
<b>Life underwriting risk post diversification</b>	<b>223</b>	<b>223</b>	<b>223</b>	<b>223</b>	-	-
<b>Health underwriting risk post diversification</b>	<b>162</b>		<b>162</b>		-	
<b>Non-Life underwriting risk post diversification</b>	<b>8,300</b>	<b>4,839</b>	<b>7,436</b>	<b>3,603</b>	<b>1,258</b>	<b>1,572</b>

2.3 A Simplification approach is used in the application of the Method 1 for the calculation of the risk margin. A provision for a counterparty risk (reinsurance bad debt) has been included within the technical provisions using the simplification allowed under the Art. 61 of the Commission Delegated Regulation (EU) 2015/35. The risk mitigating effect has been calculated in accordance with Art. 111 of the Commission Delegated Regulation (EU) 2015/35 which allows for a simplified calculation of the risk mitigating effect itself.

2.4 There has been no use of undertaking specific parameters in the non-life underwriting risk calculation.

### 3. Use of the Duration-Based Equity Risk Sub-Module in the calculation of the Solvency Capital Requirement

This section is not applicable to the Group.

### 4. Differences between the Standard Formula and any Internal Model used

Capital and solvency requirements are computed and monitored using the standard model formula. Therefore, no additional information is reported in this section.

5. Non-Compliance with the Minimum Capital Requirement and Non-Compliance with the Solvency Capital Requirement

At the end of the reporting period, the Group was compliant with the Minimum Margin and Solvency Capital Requirement and had surplus to meet and exceed the Solvency II requirements for all three regulated entities and the Group.

6. Any Other Information

The Directors do not consider that further information should be disclosed for the Group in relation to the management of the capital.

## F. Appendices – Public QRTs

### 1. EHL Group Year End 2024

**Table 13** – EHL Group S.02.01.02 Balance Sheet as at 31.12.2024. Values in USD thousands.

#### Annex I

#### S.02.01.02

#### Balance sheet

#### Assets

Intangible assets
Deferred tax assets
Pension benefit surplus
Property, plant & equipment held for own use
Investments (other than assets held for index-linked and unit-linked contracts)
Property (other than for own use)
Holdings in related undertakings, including participations
Equities
Equities - listed
Equities - unlisted
Bonds
Government Bonds
Corporate Bonds
Structured notes
Collateralised securities
Collective Investments Undertakings
Derivatives
Deposits other than cash equivalents
Other investments
Assets held for index-linked and unit-linked contracts
Loans and mortgages
Loans on policies
Loans and mortgages to individuals
Other loans and mortgages
Reinsurance recoverables from:
Non-life and health similar to non-life
Non-life excluding health
Health similar to non-life
Life and health similar to life, excluding health and index-linked and unit-linked
Life and health similar to life, excluding index-linked and unit-linked
Life excluding health and index-linked and unit-linked
Life index-linked and unit-linked
Deposits to cedants
Insurance and intermediaries receivables
Reinsurance receivables
Receivables (trade, not insurance)
Own shares (held directly)
Amounts due in respect of own fund items or initial fund called up but not yet paid in
Cash and cash equivalents
Any other assets, not elsewhere shown
<b>Total assets</b>

	Solvency II value
	C0010
<b>R0030</b>	
<b>R0040</b>	
<b>R0050</b>	
<b>R0060</b>	
<b>R0070</b>	51,584
<b>R0080</b>	
<b>R0090</b>	
<b>R0100</b>	1,691
<b>R0110</b>	
<b>R0120</b>	1,691
<b>R0130</b>	41,295
<b>R0140</b>	3,377
<b>R0150</b>	37,918
<b>R0160</b>	
<b>R0170</b>	
<b>R0180</b>	8,350
<b>R0190</b>	
<b>R0200</b>	248
<b>R0210</b>	
<b>R0220</b>	
<b>R0230</b>	
<b>R0240</b>	
<b>R0250</b>	
<b>R0260</b>	
<b>R0270</b>	14,999
<b>R0280</b>	5,132
<b>R0290</b>	
<b>R0300</b>	
<b>R0310</b>	
<b>R0315</b>	9,867
<b>R0330</b>	
<b>R0340</b>	
<b>R0350</b>	
<b>R0360</b>	7,322
<b>R0370</b>	2,288
<b>R0380</b>	313
<b>R0390</b>	
<b>R0400</b>	
<b>R0410</b>	26,756
<b>R0420</b>	267
<b>R0500</b>	103,529

**Table 13 (continued)** – EHL Group S.02.01.02 Balance Sheet as at 31.12.2024. Values in USD thousands.

	Solvency II value
	C0010
<b>Liabilities</b>	
Technical provisions – total	<b>R0505</b> 53,612
Technical provisions – non-life	<b>R0510</b> 39,995
Technical provisions - life	<b>R0515</b> 13,617
Best estimate - total	<b>R0542</b> 52,386
Best estimate - non-life	<b>R0544</b> 39,083
Best estimate - life	<b>R0546</b> 13,303
Risk margin - total	<b>R0552</b> 1,226
Risk margin - non-life	<b>R0554</b> 911
Risk margin - life	<b>R0556</b> 315
Transitional (TMTP) – life	<b>R0565</b>
Other technical provisions	<b>R0730</b>
Contingent liabilities	<b>R0740</b>
Provisions other than technical provisions	<b>R0750</b>
Pension benefit obligations	<b>R0760</b>
Deposits from reinsurers	<b>R0770</b>
Deferred tax liabilities	<b>R0780</b>
Derivatives	<b>R0790</b>
Debts owed to credit institutions	<b>R0800</b>
Financial liabilities other than debts owed to credit institutions	<b>R0810</b>
Insurance & intermediaries payables	<b>R0820</b> 3,242
Reinsurance payables	<b>R0830</b>
Payables (trade, not insurance)	<b>R0840</b>
Subordinated liabilities	<b>R0850</b>
Subordinated liabilities not in BOF	<b>R0860</b>
Subordinated liabilities in BOF	<b>R0870</b>
Any other liabilities, not elsewhere shown	<b>R0880</b> 827
<b>Total liabilities</b>	<b>R0900</b> 57,681
<b>Excess of assets over liabilities</b>	<b>R1000</b> 45,848

**Table 14** – EHL Group S.05.01.02 Premiums, claims and expenses by line of business as at 31.12.2024. Values in USD thousands.

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Line of business for:				Total
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	
Premiums written																		
Gross - Direct Business	R0110							1,031		89								1,120
Gross - Proportional reinsurance accepted	R0120						-6	-4										-10
Gross - Non-proportional reinsurance accepted	R0130																	
Reinsurers' share	R0140																	
Net	R0200						-6	-4	1,031	89								1,110
Premiums earned																		
Gross - Direct Business	R0210							3,781		389								4,170
Gross - Proportional reinsurance accepted	R0220						-6	-4										-9
Gross - Non-proportional reinsurance accepted	R0230																	
Reinsurers' share	R0240																	
Net	R0300						-6	-4	3,781	389								4,161
Claims incurred																		
Gross - Direct Business	R0310				124	5	319		2,127	788								3,362
Gross - Proportional reinsurance accepted	R0320						-9	-65										-75
Gross - Non-proportional reinsurance accepted	R0330																	
Reinsurers' share	R0340																	
Net	R0400				124	5	309	-65	2,127	788								3,287
Changes in other technical provisions																		
Gross - Direct Business	R0410					-80				204								123
Gross - Proportional reinsurance accepted	R0420																	
Gross - Non-proportional reinsurance accepted	R0430																	
Reinsurers' share	R0440																	
Net	R0500					-80				204								123
Expenses incurred	R0550					46	1,896	103		429								2,474
Other expenses	R1200																	
Total expenses	R1300																	2,474

**Table 15 – EHL Group S.23.01.22 Own funds as at 31.12.2024. Values in USD thousands.**

IR.23.02.04 - Detailed information by tiers on own funds

			Total	Tier 1		Tier 2		Tier 3
				Tier 1	Of which counted under transitionals	Tier 2	Of which counted under transitionals	
			C0010	C0020	C0030	C0040	C0050	C0060
Ordinary share capital	Paid in	R0010	0	0				
	Called up but not yet paid in	R0020	0			0		
	Own shares held	R0030	0	0				
Total ordinary share capital			R0100	0	0	0		
Initial funds, members'	Paid in	R0110	0	0				
	Called up but not yet paid in	R0120	0			0		
	Total initial fund members' contributions or the equivalent basic own fund item for mutual and mutual type undertakings	R0200	0	0		0		
Subordinated mutual members	Dated subordinated	R0210	0					
	Undated subordinated with a call option	R0220	0					
	Undated subordinated with no contractual opportunity to redeem	R0230	0					
Total subordinated mutual members accounts			R0300	0	0	0	0	0
Preference shares	Dated preference shares	R0310	0					
	Undated preference shares with a call option	R0320	0					
	Undated preference shares with no contractual opportunity to redeem	R0330	0					
Total preference shares			R0400	0	0	0	0	0
Subordinated liabilities	Dated subordinated liabilities	R0410	0					
	Undated subordinated liabilities with a contractual opportunity to redeem	R0420	0					
	Undated subordinated liabilities with no contractual opportunity to redeem	R0430	0					
Total subordinated liabilities			R0500	0	0	0	0	0

			Tier 2		Tier 3		
			Initial amounts approved	Current amounts	Initial amounts approved	Current amounts	
			C0070	C0080	C0090	C0100	
Ancillary own funds	Items for which an amount was approved	R0510					
	Items for which a method was approved	R0520					

			Total
			C0110
Excess of assets over liabilities - attribution of valuation differences	Difference in the valuation of assets	R0600	1,470,801
	Difference in the valuation of technical provisions	R0610	-785,948
	Difference in the valuation of other liabilities	R0620	-54,760
	Total of reserves and retained earnings from financial statements	R0630	
	Other, please explain why you need to use this line	R0640	43,537,009
	Reserves from financial statements adjusted for Solvency II valuation	R0650	45,848,518
	Excess of assets over liabilities attributable to basic own fund items	R0660	0
	Excess of assets over liabilities	R0700	45,848,518



**Table 16** – EHL Group S.25.01.22 Solvency Capital Requirement - for groups on Standard Formula as at 31.12.2024. Values in USD thousands.

IR.25.04.04 - Solvency Capital Requirement

Rows		c
		C0010
Net of loss-absorbing capacity of technical provisions		
Market risk	R0140	0
Interest rate risk	R0070	750,209
Equity risk	R0080	4,230,309
Property risk	R0090	0
Spread risk	R0100	2,068,427
Concentration risk	R0110	98,774
Currency risk	R0120	1,029,127
Other market risk	R0125	0
Diversification within market risk	R0130	0
Counterparty default risk	R0180	0
Type 1 exposures	R0150	1,667,816
Type 2 exposures	R0160	0
Other counterparty risk	R0165	0
Diversification within counterparty default risk	R0170	0
Life underwriting risk	R0270	0
Mortality risk	R0190	0
Longevity risk	R0200	222,515
Disability-Morbidity risk	R0210	0
Life-expense risk	R0220	0
Revision risk	R0230	0
Lapse risk	R0240	0
Life catastrophe risk	R0250	0
Other life underwriting risk	R0255	0
Diversification within life underwriting risk	R0260	0
Total health underwriting risk	R0320	0
Health SLT risk	R0280	
Health non SLT risk	R0290	161,716
Health catastrophe risk	R0300	
Other health underwriting risk	R0305	0
Diversification within health underwriting risk	R0310	0
Non-life underwriting risk	R0370	0
Non-life premium and reserve risk (ex catastrophe risk)	R0330	8,299,820
Non-life catastrophe risk	R0340	0
Lapse risk	R0350	0
Other non-life underwriting risk	R0355	0
Diversification within non-life underwriting risk	R0360	0
Intangible asset risk	R0400	0
Operational and other risks	R0430	0
Operational risk	R0422	1,232,360
Other risks	R0424	0
Total before all diversification	R0432	0
Total before diversification between risk modules	R0434	0
Diversification between risk modules	R0436	0
Total after diversification	R0438	0
Loss-absorbing capacity of technical provisions	R0440	
Loss-absorbing capacity of deferred taxes	R0450	
Other adjustments	R0455	0
Solvency capital requirement including undisclosed capital	R0460	0
Disclosed capital add-on - excluding residual model	R0472	
Disclosed capital add-on - residual model limitation	R0474	
<b>Solvency capital requirement including capital add-</b>	<b>R0480</b>	<b>0</b>
Undisclosed capital add-on - residual model limitation	R0482	
Capital add-on	R0484	0
Biting interest rate scenario	R0490	Decrease
Biting life lapse scenario	R0495	
<b>Information on other entities</b>		
Capital requirement for other financial sectors (Non-	R0500	0
Capital requirement for other financial sectors (Non-	R0510	
Capital requirement for other financial sectors (Non-	R0520	
Capital requirement for other financial sectors (Non-	R0530	
Capital requirement for non-controlled participation	R0540	
Capital requirement for residual undertakings	R0550	
<b>Overall SCR</b>		
Solvency capital requirement (consolidation method)	R0555	0
SCR for undertakings included via D and A	R0560	
SCR for sub-groups included via D and A	R0565	
<b>Solvency capital requirement</b>	<b>R0570</b>	<b>0</b>

**Table 17** – EHL S.32.01.22 Undertakings in the scope of the group as at 31.12.2024. Values in USD thousands.

								Criteria of influence						Inclusion in the scope of group supervision		Group solvency calculation
Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority	% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	YES/NO	Date of decision if art. 214 is applied	Method used and under method 1, treatment of the undertaking
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
GI	2138004I7ZV4IZXAZ694	LEI	EIFLOW INSURANCE LIMITED	2	limited by shares	2	Gibraltar Financial Services Commission	100.00%	100	100.00%		1	100.00%	1		1
GI	213800HU12V8LR7SFQ36	LEI	BEACON INSURANCE COMPANY LIMITED	2	limited by shares	2	Gibraltar Financial Services Commission	100.00%	100	100.00%		1	100.00%	1		1

## 2. EHL Group Year End 2023

**Table 18** – EHL Group S.02.01.02 Balance Sheet as at 31.12.2023. Values in USD thousands.

		Solvency II value
		C0010
<b>Assets</b>		
Intangible assets	R0030	
Deferred tax assets	R0040	
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	43,665
Property (other than for own use)	R0080	244
Holdings in related undertakings, including participations	R0090	
Equities	R0100	1,691
Equities - listed	R0110	
Equities - unlisted	R0120	1,691
Bonds	R0130	33,810
Government Bonds	R0140	1,974
Corporate Bonds	R0150	31,263
Structured notes	R0160	
Collateralised securities	R0170	573
Collective Investments Undertakings	R0180	7,628
Derivatives	R0190	
Deposits other than cash equivalents	R0200	292
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	
Reinsurance recoverables from:	R0270	1,167
Non-life and health similar to non-life	R0280	539
Non-life excluding health	R0290	539
Health similar to non-life	R0300	
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	628
Health similar to life	R0320	
Life excluding health and index-linked and unit-linked	R0330	628
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	12,155
Reinsurance receivables	R0370	2,478
Receivables (trade, not insurance)	R0380	0
Own shares (held directly)	R0390	
Amounts due in respect of own fund items or initial fund called up but not yet	R0400	
Cash and cash equivalents	R0410	7,079
Any other assets, not elsewhere shown	R0420	0
<b>Total assets</b>	<b>R0500</b>	<b>66,545</b>

**Table 18** (continued) – EHL Group S.02.01.02 Balance Sheet as at 31.12.2023. Values in USD thousands.

	Solvency II value
	C0010
<b>Liabilities</b>	
Technical provisions – non-life	<b>R0510</b> 20,734
Technical provisions – non-life (excluding health)	<b>R0520</b> 20,734
TP calculated as a whole	<b>R0530</b>
Best Estimate	<b>R0540</b> 19,943
Risk margin	<b>R0550</b> 792
Technical provisions - health (similar to non-life)	<b>R0560</b>
TP calculated as a whole	<b>R0570</b>
Best Estimate	<b>R0580</b>
Risk margin	<b>R0590</b>
Technical provisions - life (excluding index-linked and unit-linked)	<b>R0600</b> 793
Technical provisions - health (similar to life)	<b>R0610</b> 793
TP calculated as a whole	<b>R0620</b>
Best Estimate	<b>R0630</b> 763
Risk margin	<b>R0640</b> 30
Technical provisions – life (excluding health and index-linked and unit-linked)	<b>R0650</b>
TP calculated as a whole	<b>R0660</b>
Best Estimate	<b>R0670</b>
Risk margin	<b>R0680</b>
Technical provisions – index-linked and unit-linked	<b>R0690</b>
TP calculated as a whole	<b>R0700</b>
Best Estimate	<b>R0710</b>
Risk margin	<b>R0720</b>
Contingent liabilities	<b>R0740</b>
Provisions other than technical provisions	<b>R0750</b>
Pension benefit obligations	<b>R0760</b>
Deposits from reinsurers	<b>R0770</b>
Deferred tax liabilities	<b>R0780</b>
Derivatives	<b>R0790</b>
Debts owed to credit institutions	<b>R0800</b>
Financial liabilities other than debts owed to credit institutions	<b>R0810</b>
Insurance & intermediaries payables	<b>R0820</b> 2,730
Reinsurance payables	<b>R0830</b> 233
Payables (trade, not insurance)	<b>R0840</b>
Subordinated liabilities	<b>R0850</b>
Subordinated liabilities not in BOF	<b>R0860</b>
Subordinated liabilities in BOF	<b>R0870</b>
Any other liabilities, not elsewhere shown	<b>R0880</b> 6,035
<b>Total liabilities</b>	<b>R0900</b> 30,527
<b>Excess of assets over liabilities</b>	<b>R1000</b> 36,018

**Table 19** – EHL Group S.05.01.02 Premiums, claims and expenses by line of business as at 31.12.2023. Values in USD thousands.

		Line of Business for: <b>non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)</b>												Line of business for:				
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	Total
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
<b>Premiums written</b>																		
Gross - Direct Business	R0110								1,031		89							1,120
Gross - Proportional reinsurance accepted	R0120						-6	-4										-10
Gross - Non-proportional reinsurance accepted	R0130																	
Reinsurers' share	R0140																	
Net	R0200						-6	-4	1,031		89							1,110
<b>Premiums earned</b>																		
Gross - Direct Business	R0210								3,781		389							4,170
Gross - Proportional reinsurance accepted	R0220						-6	-4										-9
Gross - Non-proportional reinsurance accepted	R0230																	
Reinsurers' share	R0240																	
Net	R0300						-6	-4	3,781		389							4,161
<b>Claims incurred</b>																		
Gross - Direct Business	R0310				124	5	319		2,127		788							3,362
Gross - Proportional reinsurance accepted	R0320						-9	-65										-75
Gross - Non-proportional reinsurance accepted	R0330																	
Reinsurers' share	R0340																	
Net	R0400				124	5	309	-65	2,127		788							3,287
<b>Changes in other technical provisions</b>																		
Gross - Direct Business	R0410					-80					204							123
Gross - Proportional reinsurance accepted	R0420																	
Gross - Non-proportional reinsurance accepted	R0430																	
Reinsurers' share	R0440																	
Net	R0500					-80					204							123
<b>Expenses incurred</b>	R0550					46	1,896	103			429							2,474
<b>Other expenses</b>	R1200																	
<b>Total expenses</b>	R1300																	2,474

**Table 20 – EHL Group S.23.01.22 Own funds as at 31.12.2023. Values in USD thousands.**

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector</b>					
Ordinary share capital (gross of own shares)	R0010				
Non-available called but not paid in ordinary share capital at group level	R0020				
Share premium account related to ordinary share capital	R0030				
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040				
Subordinated mutual member accounts	R0050				
Non-available subordinated mutual member accounts at group level	R0060				
Surplus funds	R0070				
Non-available surplus funds at group level	R0080				
Preference shares	R0090				
Non-available preference shares at group level	R0100				
Share premium account related to preference shares	R0110				
Non-available share premium account related to preference shares at group level	R0120				
Reconciliation reserve	R0130	36,018	36,018		
Subordinated liabilities	R0140				
Non-available subordinated liabilities at group level	R0150				
An amount equal to the value of net deferred tax assets	R0160				
The amount equal to the value of net deferred tax assets not available at the group level	R0170				
Other items approved by supervisory authority as basic own funds not specified above	R0180				
Non available own funds related to other own funds items approved by supervisory authority	R0190				
Minority interests (if not reported as part of a specific own fund item)	R0200				
Non-available minority interests at group level	R0210				
<b>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</b>					
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				
<b>Deductions</b>					
Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities	R0230				
whereof deducted according to art 228 of the Directive 2009/138/EC	R0240				
Deductions for participations where there is non-availability of information (Article 229)	R0250				
Deduction for participations included by using D&A when a combination of methods is used	R0260				
Total of non-available own fund items	R0270				
<b>Total deductions</b>	R0280				
<b>Total basic own funds after deductions</b>	R0290	36,018	36,018		
<b>Ancillary own funds</b>					
Unpaid and uncalled ordinary share capital callable on demand	R0300				
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310				
Unpaid and uncalled preference shares callable on demand	R0320				
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350				
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340				
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360				
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370				
Non available ancillary own funds at group level	R0380				
Other ancillary own funds	R0390				
<b>Total ancillary own funds</b>	R0400				
<b>Own funds of other financial sectors</b>					
<b>Reconciliation reserve</b>					
Institutions for occupational retirement provision	R0410				
Non regulated entities carrying out financial activities	R0420				
Total own funds of other financial sectors	R0430				
<b>Own funds when using the D&amp;A, exclusively or in combination of method 1</b>					
Own funds aggregated when using the D&A and combination of method	R0450				
Own funds aggregated when using the D&A and a combination of method net of IGT	R0460				
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 )	R0520	36,018	36,018		
Total available own funds to meet the minimum consolidated group SCR	R0530	36,018	36,018		
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 )	R0560	36,018	36,018		
Total-eligible own funds to meet the minimum consolidated group SCR	R0570	36,018	36,018		
<b>Minimum consolidated Group SCR</b>	R0610	4,416			
<b>Ratio of Eligible own funds to Minimum Consolidated Group SCR</b>	R0650	815.70%			
<b>Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&amp;A )</b>	R0660	36,018	36,018		
<b>Group SCR</b>	R0680	8,729			
<b>Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&amp;A</b>	R0690	412.62%			
<b>Reconciliation reserve</b>					
Excess of assets over liabilities	R0700	36,018			
Own shares (included as assets on the balance sheet)	R0710				
Forseeable dividends, distributions and charges	R0720				
Other basic own fund items	R0730				
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740				
Other non available own funds	R0750				
<b>Reconciliation reserve before deduction for participations in other financial sector</b>	R0760	36,018			
<b>Expected profits</b>					
Expected profits included in future premiums (EPIFP) - Life business	R0770				
Expected profits included in future premiums (EPIFP) - Non- life business	R0780				
<b>Total EPIFP</b>	R0790				

**Table 21** – EHL Group S.25.01.22 Solvency Capital Requirement - for groups on Standard Formula as at 31.12.2023. Values in USD thousands.

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
Market risk	R0010 4,996		
Counterparty default risk	R0020 619		
Life underwriting risk	R0030 223		
Health underwriting risk	R0040		
Non-life underwriting risk	R0050 4,839		
Diversification	R0060 -2,549		
Intangible asset risk	R0070		
<b>Basic Solvency Capital Requirement</b>	R0100 8,127		
<b>Calculation of Solvency Capital Requirement</b>			
Operational risk	R0130 602		
Loss-absorbing capacity of technical provisions	R0140		
Loss-absorbing capacity of deferred taxes	R0150		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160		
<b>Solvency capital requirement excluding capital add-on</b>	R0200 8,729		
Capital add-on already set	R0210		
<b>Solvency capital requirement</b>	R0220 8,729		
<b>Other information on SCR</b>			
Capital requirement for duration-based equity risk sub-module	R0400		
Total amount of Notional Solvency Capital Requirements for remaining part	R0410		
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420		
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430		
Diversification effects due to RFF nSCR aggregation for article 304	R0440		
Minimum consolidated group solvency capital requirement	R0470 4,416		
<b>Information on other entities</b>			
Capital requirement for other financial sectors (Non-insurance capital requirements)	R0500		
Capital requirement for other financial sectors (Non-insurance capital requirements) - Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies	R0510		
Capital requirement for other financial sectors (Non-insurance capital requirements) - Institutions for occupational retirement provisions	R0520		
Capital requirement for other financial sectors (Non-insurance capital requirements) - Capital requirement for non-regulated entities carrying out financial activities	R0530		
Capital requirement for non-controlled participation requirements	R0540		
Capital requirement for residual undertakings	R0550		
<b>Overall SCR</b>			
SCR for undertakings included via D and A	R0560		
<b>Solvency capital requirement</b>	R0570 8,729		

**Table 22** – EHL S.32.01.22 Undertakings in the scope of the group as at 31.12.2023. Values in USD thousands.

								Criteria of influence						Inclusion in the scope of group supervision		Group solvency calculation
Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority	% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	YES/NO	Date of decision if art. 214 is applied	Method used and under method 1, treatment of the undertaking
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
GI	213800417ZV4IZXAZ694	LEI	EIFLOW INSURANCE LIMITED	2	limited by shares	2	Gibraltar Financial Services Commission	100.00%	100	100.00%		1	100.00%	1		1
GI	213800HU12V8LR7SFQ36	LEI	BEACON INSURANCE COMPANY LIMITED	2	limited by shares	2	Gibraltar Financial Services Commission	100.00%	100	100.00%		1	100.00%	1		1



### 3. EIFlow Insurance Limited Year End 2024

**Table 23** – EIL IR.02.01.02 Balance Sheet as at 31.12.2024. Values in USD thousands.

		Solvency II value
		C0010
<b>Assets</b>		
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	
Deferred tax assets	R0040	
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	45,989
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	
Equities	R0100	6,431
Equities - listed	R0110	
Equities - unlisted	R0120	6,431
Bonds	R0130	31,224
Government Bonds	R0140	2,970
Corporate Bonds	R0150	28,254
Structured notes	R0160	
Collateralised securities	R0170	
Collective Investments Undertakings	R0180	8,333
Derivatives	R0190	
Deposits other than cash equivalents	R0200	
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	
Reinsurance recoverables from:	R0270	14,999
Non-life and health similar to non-life	R0280	5,132
Life and health similar to life, excluding index-linked and unit-linked	R0315	9,867
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	5,614
Reinsurance receivables	R0370	
Receivables (trade, not insurance)	R0380	2,288
Own shares (held directly)	R0390	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	
Cash and cash equivalents	R0410	26,392
Any other assets, not elsewhere shown	R0420	267
<b>Total assets</b>	<b>R0500</b>	<b>95,549</b>

**Table 23** (continued) – EIL IR.02.01.02 Balance Sheet as at 31.12.2024. Values in USD thousands.

		Solvency II value
		C0010
<b>Total assets</b>	<b>R0500</b>	<b>95,549</b>
<b>Liabilities</b>		
Technical provisions - total	R0505	49,706
Technical provisions - non-life	R0510	36,089
Technical provisions - life	R0515	13,617
Best estimate - total	R0542	48,558
Best estimate - non-life	R0544	35,255
Best estimate - life	R0546	13,303
Risk margin - total	R0552	1,148
Risk margin - non-life	R0554	833
Risk margin - life	R0556	314
Transitional (TMTP) - life	R0565	
Other technical provisions	R0730	
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	
Pension benefit obligations	R0760	
Deposits from reinsurers	R0770	
Deferred tax liabilities	R0780	
Derivatives	R0790	
Debts owed to credit institutions	R0800	
Financial liabilities other than debts owed to credit institutions	R0810	
Insurance & intermediaries payables	R0820	2,934
Reinsurance payables	R0830	
Payables (trade, not insurance)	R0840	
Subordinated liabilities	R0850	
Subordinated liabilities not in Basic Own Funds	R0860	
Subordinated liabilities in Basic Own Funds	R0870	
Any other liabilities, not elsewhere shown	R0880	744
<b>Total liabilities</b>	<b>R0900</b>	<b>53,384</b>
<b>Excess of assets over liabilities</b>	<b>R1000</b>	<b>42,165</b>

Table 24 – EIL IR.05.04.02 Premiums, claims and expenses by line of business as at 31.12.2024. Values in USD thousands.

		All business (including annuities stemming from accepted non-life insurance and reinsurance contracts)																		
		All non-life business (ie excluding annuities stemming from accepted insurance and reinsurance contracts)																		
		Line of Business for non-life insurance and accepted proportional reinsurance obligations																		
		Medical expense insurance (lines of business 1 and 13)	Income protection insurance (lines of business 2 and 14)	Workers' compensation insurance (lines of business 3 and 15)	Motor vehicle liability insurance - personal lines (line of business 4)	Motor vehicle liability insurance - non-personal lines (lines of business 5 and 6)	Motor vehicle other motor insurance - personal lines (line of business 7)	Motor vehicle other motor insurance - non-personal lines (lines of business 8 and 9)	Marine, aviation and transport insurance (lines of business 10 and 11)	Fire and other damage to property insurance - personal lines (lines of business 12 and 13)	Fire and other damage to property insurance - non-personal (lines of business 14 and 15)	Employers Liability	General liability insurance				Credit and suretyship insurance (Lines of business 16 and 17)	Legal expenses insurance (lines of business 18 and 19)	Assistance (Lines of business 20 and 21)	Miscellaneous financial loss (Lines of business 22 and 23)
C0010	C0015	C0110	C0120	C0130	C0140	C0141	C0150	C0151	C0160	C0170	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260	
Income																				
Premiums written																				
Gross written premiums	R0110																			
Gross written premiums - insurance (direct)	R0111																			
Gross written premiums - accepted reinsurance	R0113																			
Net written premiums	R0160																			
Premiums earned and provision for unearned																				
Gross earned premiums	R0210																			
Net earned premiums	R0220																			
Expenditure																				
Claims incurred																				
Gross (undiscounted) claims incurred	R0610		70,608				50,308			9,266					7,709		3,325			
Gross (undiscounted) direct business	R0611		70,608				50,308			9,266					7,709		3,325			
Gross (undiscounted) reinsurance accepted	R0612																			
Net (undiscounted) claims incurred	R0690		41,918				21,940			9,266					7,387		3,325			
Net (discounted) claims incurred	R0730	41,918	41,918																	
Analysis of expenses incurred																				
Technical expenses incurred net of reinsurance ceded	R0910																			
Acquisition costs, commissions, claims management costs	R0985																			
Other expenditure																				
Other expenses	R1140																			
Total expenditure	R1310	41,918																		

**Table 25** – EIL IR.05.02.01 Premiums, claims and expenses by country as at 31.12.2024. Values in USD thousands.

Home Country - non-life obligations		Top 5 countries (by amount of gross premiums written) - non-life obligations						Total Top 5 and home country - non-life obligations
		Home country						Total Top 5 and home country
		C0080	C0090	C0090	C0090	C0090	C0090	C0140
Country	R0010							
<b>Premiums written</b>								
Gross - Direct Business	R0110							
Gross - Proportional reinsurance accepted	R0120							
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140							
Net	R0200							
<b>Premiums earned</b>								
Gross - Direct Business	R0210							
Gross - Proportional reinsurance accepted	R0220							
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240							
Net	R0300							
<b>Claims incurred</b>								
Gross - Direct Business	R0310	70,608						70,608
Gross - Proportional reinsurance accepted	R0320							
Gross - Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340	28,690						28,690
Net	R0400	41,918						41,918
<b>Net expenses incurred</b>	R0550							

**Table 26 – EIL IR.17.01.02 Non-life technical provisions as at 31.12.2024. Values in USD thousands.**

		Direct business and accepted proportional reinsurance												Accepted non-proportional reinsurance					Total Non-Life obligation
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance		
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180	
Best estimate																			
Premium provisions																			
Gross	R0060									368							368		
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected loss	R0140																		
Net Best Estimate of Premium Provisions	R0150									368							368		
Claims provisions																			
Gross	R0160		385		10,298	6,595	6,380	325	8,271	2,634							34,887		
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected loss	R0240				2,256	2,567			309								5,132		
Net Best Estimate of Claims Provisions	R0250		385		8,042	4,028	6,380	325	7,962	2,634							29,755		
Total Best estimate - gross	R0260		385		10,298	6,595	6,380	325	8,271	3,001							35,255		
Total Best estimate - net	R0270		385		8,042	4,028	6,380	325	7,962	3,001							30,123		
Risk margin	R0280		9		243	156	151	8	196	71							833		
Technical provisions - total (best estimate plus risk margin)																			
Technical provisions - total	R0320		394		10,541	6,751	6,530	333	8,467	3,072							36,089		
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected loss	R0330				2,256	2,567			309								5,132		
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340		394		8,285	4,184	6,530	333	8,158	3,072							30,957		

**Table 27** – EIL IR.19.01.21.UY Non-life Insurance Claims Information as at 31.12.2024. Values in USD thousands.

Accident year /	Z0020	Underwriting year [UWY]
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**Gross Claims Paid (non-cumulative) - Development year. Total Non-Life Business**

			1	2	3	4	5	6	7	8	9	10 & +
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100											395
N-9	R0160							68	208	45	24	
N-8	R0170						1	56	240	18		
N-7	R0180					5	142	48	2			
N-6	R0190					23	48	23				
N-5	R0200						13					
N-4	R0210											
N-3	R0220											
N-2	R0230											
N-1	R0240											
N	R0250											

		In Current year	Sum of years (cumulative)
		C0170	C0180
Prior	R0100	395	395
N-9	R0160	24	345
N-8	R0170	18	315
N-7	R0180	2	196
N-6	R0190	23	94
N-5	R0200	13	13
N-4	R0210		
N-3	R0220		
N-2	R0230		
N-1	R0240		
N	R0250		
Total	R0260	475	1,359

**Gross undiscounted Best Estimate Claims Provisions - Development year. Total Non-Life Business**

			1	2	3	4	5	6	7	8	9	10 & +
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300
Prior	R0100											
N-9	R0160								-9	29	12,288	56,100
N-8	R0170						144	551	53			
N-7	R0180					94	330	58	79			
N-6	R0190			84		114	1,736	98				
N-5	R0200						2,093					
N-4	R0210											
N-3	R0220											
N-2	R0230											
N-1	R0240											
N	R0250											

		Year end (discounted data)
		C0360
Prior	R0100	39,961
N-9	R0160	7,597
N-8	R0170	
N-7	R0180	75
N-6	R0190	92
N-5	R0200	1,981
N-4	R0210	
N-3	R0220	
N-2	R0230	
N-1	R0240	
N	R0250	
Total	R0260	49,706

**Table 28** – EIL IR.23.01.01 Own funds as at 31.12.2024. Values in USD thousands.

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
<b>Basic own funds</b>						
Ordinary share capital (gross of own shares)	R0010	12,100	12,100			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	30,065	30,065			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
<b>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</b>						
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					
<b>Total basic own funds</b>	R0290	42,165	42,165			
<b>Ancillary own funds</b>						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees	R0340					
Letters of credit and guarantees other	R0350					
Supplementary members calls	R0360					
Supplementary members calls - other	R0370					
Other ancillary own funds	R0390					
<b>Total ancillary own funds</b>	R0400					
<b>Available and eligible own funds</b>						
Total available own funds to meet the SCR	R0500	42,165	42,165			
Total available own funds to meet the MCR	R0510	42,165	42,165			
Total eligible own funds to meet the SCR	R0540	42,165	42,165			
Total eligible own funds to meet the MCR	R0550	42,165	42,165			
<b>SCR</b>	R0580	13,495				
<b>MCR</b>	R0600	4,140				
<b>Ratio of Eligible own funds to SCR</b>	R0620	312.44%				
<b>Ratio of Eligible own funds to MCR</b>	R0640	1018.39%				

IR.23.01.01.02

Reconciliation reserve

		C0060
<b>Reconciliation reserve</b>		
Excess of assets over liabilities	R0700	42,165
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Deductions for participations in financial and credit institutions	R0725	
Other basic own fund items	R0730	12,100
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
<b>Reconciliation reserve</b>	R0760	30,065

**Table 29** – EIL IR.25.0.21 Solvency Capital Requirement as at 31.12.2024. Values in USD thousands.

Rows		C0010
Net of loss-absorbing capacity of technical provisions		
Market risk	R0140	7,043
Interest rate risk	R0070	194
Equity risk	R0080	5,265
Property risk	R0090	
Spread risk	R0100	1,971
Concentration risk	R0110	24
Currency risk	R0120	560
Other market risk	R0125	
Diversification within market risk	R0130	-971
Counterparty default risk	R0180	1,620
Type 1 exposures	R0150	1,620
Type 2 exposures	R0160	
Other counterparty risk	R0165	
Diversification within counterparty default risk	R0170	
Life underwriting risk	R0270	223
Mortality risk	R0190	223
Longevity risk	R0200	
Disability-Morbidity risk	R0210	
Life-expense risk	R0220	
Revision risk	R0230	
Lapse risk	R0240	
Life catastrophe risk	R0250	
Other life underwriting risk	R0255	
Diversification within life underwriting risk	R0260	
Total health underwriting risk	R0320	162
Health SLT risk	R0280	
Health non SLT risk	R0290	162
Health catastrophe risk	R0300	
Other health underwriting risk	R0305	
Diversification within health underwriting risk	R0310	
Non-life underwriting risk	R0370	7,436
Non-life premium and reserve risk (ex catastrophe risk)	R0330	7,436
Non-life catastrophe risk	R0340	
Lapse risk	R0350	
Other non-life underwriting risk	R0355	
Diversification within non-life underwriting risk	R0360	
Intangible asset risk	R0400	
Operational and other risks	R0430	1,118
Operational risk	R0422	1,118
Other risks	R0424	
Total before all diversification	R0432	18,572
Total before diversification between risk modules	R0434	17,601
Diversification between risk modules	R0436	-4,105
Total after diversification	R0438	13,495
Loss-absorbing capacity of technical provisions	R0440	
Loss-absorbing capacity of deferred taxes	R0450	
Other adjustments	R0455	
Solvency capital requirement including undisclosed capital add-on	R0460	13,495
Disclosed capital add-on - excluding residual model limitation	R0472	
Disclosed capital add-on - residual model limitation	R0474	
<b>Solvency capital requirement including capital add-on</b>	<b>R0480</b>	<b>13,495</b>
Biting interest rate scenario	R0490	Increase
Biting life lapse scenario	R0495	



**Table 30** – EIL IR.28.01.01 Minimum Capital Requirement – Only life or non-life insurance or reinsurance activity as at 31.12.2024. Values in USD thousands.

**Linear formula component for non-life insurance and reinsurance obligations**

		C0010
MCR <sub>NL</sub> Result	R0010	2,883

**Background information**

		Background information	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020		
Income protection insurance and proportional reinsurance	R0030	385	
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050	8,042	
Other motor insurance and proportional reinsurance	R0060	4,028	
Marine, aviation and transport insurance and proportional reinsurance	R0070	6,380	
Fire and other damage to property insurance and proportional reinsurance	R0080	325	
General liability insurance and proportional reinsurance	R0090	7,962	
Credit and suretyship insurance and proportional reinsurance	R0100		
Legal expenses insurance and proportional reinsurance	R0110	3,001	
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130		
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150		
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170		

**Linear formula component for life insurance and reinsurance obligations**

		C0040
MCR <sub>L</sub> Result	R0200	

**Total capital at risk for all life (re)insurance obligations**

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

**Overall MCR calculation**

		C0070
Linear MCR	R0300	2,883
SCR	R0310	13,495
MCR cap	R0320	6,073
MCR floor	R0330	3,374
Combined MCR	R0340	3,374
Absolute floor of the MCR	R0350	4,140
<b>Minimum Capital Requirement</b>	<b>R0400</b>	<b>4,140</b>

#### 4. EIFlow Insurance Limited Year End 2023

**Table 31** – EIL S.02.01.02 Balance Sheet as at 31.12.2023. Values in USD thousands.

		Solvency II value
		C0010
<b>Assets</b>		
Intangible assets	<b>R0030</b>	
Deferred tax assets	<b>R0040</b>	
Pension benefit surplus	<b>R0050</b>	
Property, plant & equipment held for own use	<b>R0060</b>	
Investments (other than assets held for index-linked and unit-linked contracts)	<b>R0070</b>	37,633
Property (other than for own use)	<b>R0080</b>	
Holdings in related undertakings, including participations	<b>R0090</b>	
Equities	<b>R0100</b>	6,431
Equities - listed	<b>R0110</b>	
Equities - unlisted	<b>R0120</b>	6,431
Bonds	<b>R0130</b>	23,573
Government Bonds	<b>R0140</b>	
Corporate Bonds	<b>R0150</b>	23,573
Structured notes	<b>R0160</b>	
Collateralised securities	<b>R0170</b>	
Collective Investments Undertakings	<b>R0180</b>	7,628
Derivatives	<b>R0190</b>	
Deposits other than cash equivalents	<b>R0200</b>	
Other investments	<b>R0210</b>	
Assets held for index-linked and unit-linked contracts	<b>R0220</b>	
Loans and mortgages	<b>R0230</b>	
Loans on policies	<b>R0240</b>	
Loans and mortgages to individuals	<b>R0250</b>	
Other loans and mortgages	<b>R0260</b>	
Reinsurance recoverables from:	<b>R0270</b>	1,119
Non-life and health similar to non-life	<b>R0280</b>	539
Non-life excluding health	<b>R0290</b>	539
Health similar to non-life	<b>R0300</b>	
Life and health similar to life, excluding health and index-linked and unit-linked	<b>R0310</b>	580
Health similar to life	<b>R0320</b>	
Life excluding health and index-linked and unit-linked	<b>R0330</b>	580
Life index-linked and unit-linked	<b>R0340</b>	
Deposits to cedants	<b>R0350</b>	
Insurance and intermediaries receivables	<b>R0360</b>	10,737
Reinsurance receivables	<b>R0370</b>	1,819
Receivables (trade, not insurance)	<b>R0380</b>	
Own shares (held directly)	<b>R0390</b>	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	<b>R0400</b>	
Cash and cash equivalents	<b>R0410</b>	6,581
Any other assets, not elsewhere shown	<b>R0420</b>	
<b>Total assets</b>	<b>R0500</b>	57,889

**Table 31** (*continued*) – EIL S.02.01.02 Balance Sheet as at 31.12.2023. Values in USD thousands.

	Solvency II value
	C0010
<b>Liabilities</b>	
Technical provisions – non-life	<b>R0510</b> 15,627
Technical provisions – non-life (excluding health)	<b>R0520</b> 15,627
TP calculated as a whole	<b>R0530</b>
Best Estimate	<b>R0540</b> 15,027
Risk margin	<b>R0550</b> 600
Technical provisions - health (similar to non-life)	<b>R0560</b>
TP calculated as a whole	<b>R0570</b>
Best Estimate	<b>R0580</b>
Risk margin	<b>R0590</b>
Technical provisions - life (excluding index-linked and unit-linked)	<b>R0600</b> 793
Technical provisions - health (similar to life)	<b>R0610</b> 793
TP calculated as a whole	<b>R0620</b>
Best Estimate	<b>R0630</b> 763
Risk margin	<b>R0640</b> 30
Technical provisions – life (excluding health and index-linked and unit-linked)	<b>R0650</b>
TP calculated as a whole	<b>R0660</b>
Best Estimate	<b>R0670</b>
Risk margin	<b>R0680</b>
Technical provisions – index-linked and unit-linked	<b>R0690</b>
TP calculated as a whole	<b>R0700</b>
Best Estimate	<b>R0710</b>
Risk margin	<b>R0720</b>
Contingent liabilities	<b>R0740</b>
Provisions other than technical provisions	<b>R0750</b>
Pension benefit obligations	<b>R0760</b>
Deposits from reinsurers	<b>R0770</b>
Deferred tax liabilities	<b>R0780</b>
Derivatives	<b>R0790</b>
Debts owed to credit institutions	<b>R0800</b>
Financial liabilities other than debts owed to credit institutions	<b>R0810</b>
Insurance & intermediaries payables	<b>R0820</b> 2,730
Reinsurance payables	<b>R0830</b>
Payables (trade, not insurance)	<b>R0840</b>
Subordinated liabilities	<b>R0850</b>
Subordinated liabilities not in BOF	<b>R0860</b>
Subordinated liabilities in BOF	<b>R0870</b>
Any other liabilities, not elsewhere shown	<b>R0880</b> 5,783
<b>Total liabilities</b>	<b>R0900</b> 24,934
<b>Excess of assets over liabilities</b>	<b>R1000</b> 32,955

**Table 32 – EIL S.05.01.02 Premiums, claims and expenses by line of business as at 31.12.2023. Values in USD thousands.**

		Line of Business for: <b>non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)</b>												Line of business for:				Total
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Heahh	Casualty	Marine, aviation, transport	Property	
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	
<b>Premiums written</b>																		
Gross - Direct Business	R0110								1,031		89							1,120
Gross - Proportional reinsurance accepted	R0120																	
Gross - Non-proportional reinsurance accepted	R0130																	
Reinsurers' share	R0140																	
Net	R0200								1,031		89							1,120
<b>Premiums earned</b>																		
Gross - Direct Business	R0210								3,781		389							4,170
Gross - Proportional reinsurance accepted	R0220																	
Gross - Non-proportional reinsurance accepted	R0230																	
Reinsurers' share	R0240																	
Net	R0300								3,781		389							4,170
<b>Claims incurred</b>																		
Gross - Direct Business	R0310				124	5	319		2,127		788							3,362
Gross - Proportional reinsurance accepted	R0320																	
Gross - Non-proportional reinsurance accepted	R0330																	
Reinsurers' share	R0340				159													159
Net	R0400				-35	5	319		2,127		788							3,203
<b>Changes in other technical provisions</b>																		
Gross - Direct Business	R0410										204							204
Gross - Proportional reinsurance accepted	R0420																	
Gross - Non- proportional reinsurance accepted	R0430																	
Reinsurers' share	R0440																	
Net	R0500										204							204
<b>Expenses incurred</b>	R0550						1,181				429							1,610
<b>Other expenses</b>	R1200																	
<b>Total expenses</b>	R1300																	1,610

**Table 33** – EIL S.05.02.01 Premiums, claims and expenses by country as at 31.12.2023. Values in USD thousands.

		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							
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
<b>Premiums written</b>								
Gross - Direct Business	R0110	1,120						1,120
Gross - Proportional reinsurance accepted	R0120							
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140							
Net	R0200	1,120						1,120
<b>Premiums earned</b>								
Gross - Direct Business	R0210	4,170						4,170
Gross - Proportional reinsurance accepted	R0220							
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240							
Net	R0300	4,170						4,170
<b>Claims incurred</b>								
Gross - Direct Business	R0310	3,362						3,362
Gross - Proportional reinsurance accepted	R0320							
Gross - Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340							
Net	R0400	3,362						3,362
<b>Changes in other technical provisions</b>								
Gross - Direct Business	R0410	204						204
Gross - Proportional reinsurance accepted	R0420							
Gross - Non- proportional reinsurance accepted	R0430							
Reinsurers' share	R0440							
Net	R0500	204						204
<b>Expenses incurred</b>	R0550	1,610						1,610
<b>Other expenses</b>	R1200							
<b>Total expenses</b>	R1300							1,610

**Table 34 – EIL S.17.01.02 Non-life technical provisions as at 31.12.2023. Values in USD thousands.**

Direct business and accepted proportional reinsurance													Accepted non-proportional reinsurance				Total Non-Life obligation
Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance		
C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180	
Technical provisions calculated as a whole																	
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																	
Gross									544							544	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default																	
Net Best Estimate of Premium Provisions									544							544	
Claims provisions																	
Gross				599	8	5,413		7,139		1,324						14,483	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default				491		48										539	
Net Best Estimate of Claims Provisions				109	8	5,365		7,139		1,324						13,944	
Total Best estimate - gross				599	8	5,413		7,139		1,868						15,027	
Total Best estimate - net				109	8	5,365		7,139		1,868						14,488	
Risk margin				24	0	216		285		75						600	
Amount of the transitional on Technical Provisions																	
Technical Provisions calculated as a whole																	
Best estimate																	
Risk margin																	
Technical provisions - total				623	8	5,629		7,424		1,942						15,627	
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total				491		48										539	
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total				132	8	5,581		7,424		1,942						15,088	

**Table 35 – EIL S.19.01.21 Non-life Insurance Claims Information as at 31.12.2023. Values in USD thousands.**

Accident year /  
Underwriting year

**Z0020**

Underwriting year [UWY]

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

	Year	Development year										In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0170	C0180
Prior	R0100											1,641	1,641
2014	R0160									6			6
2015	R0170							984		326		326	1,310
2016	R0180					68	208	45				45	321
2017	R0190				1	56	240					240	297
2018	R0200			5	142	48						48	194
2019	R0210			23	48							48	71
2020	R0220												
2021	R0230												
2022	R0240												
2023	R0250												
Total												R0260	2,348
													3,840

**Gross undiscounted Best Estimate Claims Provisions**  
(absolute amount)

	Year	Development year										Year end (discounted data)		
		1	2	3	4	5	6	7	8	9	10 & +			
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	
Prior	R0100											18,856	R0100	13,952
2014	R0160								2,529				R0160	
2015	R0170								90	9			R0170	8
2016	R0180							-9	29				R0180	26
2017	R0190					144	551	53					R0190	47
2018	R0200				94	330	58						R0200	51
2019	R0210			84	114	1,736							R0210	1,544
2020	R0220												R0220	
2021	R0230												R0230	
2022	R0240												R0240	
2023	R0250												R0250	
Total												R0260	15,627	

**Table 36** – EIL S.23.01.22 Own funds as at 31.12.2023. Values in USD thousands.

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
Market risk	R0010 5,897		
Counterparty default risk	R0020 525		
Life underwriting risk	R0030 223		
Health underwriting risk	R0040		
Non-life underwriting risk	R0050 3,603		
Diversification	R0060 -2,319		
Intangible asset risk	R0070		
<b>Basic Solvency Capital Requirement</b>	R0100 7,929		
<b>Calculation of Solvency Capital Requirement</b>	C0100		
Operational risk	R0130 454		
Loss-absorbing capacity of technical provisions	R0140		
Loss-absorbing capacity of deferred taxes	R0150		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160		
<b>Solvency capital requirement excluding capital add-on</b>	R0200 8,383		
Capital add-on already set	R0210		
<b>Solvency capital requirement</b>	R0220 8,383		
<b>Other information on SCR</b>			
Capital requirement for duration-based equity risk sub-module	R0400		
Total amount of Notional Solvency Capital Requirement for remaining part	R0410		
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420		
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430		
Diversification effects due to RFF nSCR aggregation for article 304	R0440		
<b>Approach to tax rate</b>	Yes/No		
Approach based on average tax rate	R0590 C0109		
<b>Calculation of loss absorbing capacity of deferred taxes</b>	LAC DT		
LAC DT	R0640 C0130		
LAC DT justified by reversion of deferred tax liabilities	R0650		
LAC DT justified by reference to probable future taxable economic profit	R0660		
LAC DT justified by carry back, current year	R0670		
LAC DT justified by carry back, future years	R0680		
Maximum LAC DT	R0690		



**Table 37 – EIL S.25.01.21 Solvency Capital Requirement as at 31.12.2023. Values in USD thousands.**

MCR <sub>NL</sub> Result	C0010	
	R0010	1,650

	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
	C0020	C0030
Medical expense insurance and proportional reinsurance	R0020	
Income protection insurance and proportional reinsurance	R0030	
Workers' compensation insurance and proportional reinsurance	R0040	
Motor vehicle liability insurance and proportional reinsurance	R0050	109
Other motor insurance and proportional reinsurance	R0060	8
Marine, aviation and transport insurance and proportional reinsurance	R0070	5,365
Fire and other damage to property insurance and proportional reinsurance	R0080	
General liability insurance and proportional reinsurance	R0090	7,139
Credit and suretyship insurance and proportional reinsurance	R0100	
Legal expenses insurance and proportional reinsurance	R0110	1,868
Assistance and proportional reinsurance	R0120	89
Miscellaneous financial loss insurance and proportional reinsurance	R0130	
Non-proportional health reinsurance	R0140	
Non-proportional casualty reinsurance	R0150	
Non-proportional marine, aviation and transport reinsurance	R0160	
Non-proportional property reinsurance	R0170	

**Linear formula component for life insurance and reinsurance obligations**

MCR <sub>L</sub> Result	C0040	
	R0200	

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

**Overall MCR calculation**

	C0070	
Linear MCR	R0300	1,650
SCR	R0310	8,383
MCR cap	R0320	3,772
MCR floor	R0330	2,096
Combined MCR	R0340	2,096
Absolute floor of the MCR	R0350	4,416
	C0070	
Minimum Capital Requirement	R0400	4,416

**Table 38** – EIL S.28.01.22 Minimum Capital Requirement – Only life or non-life insurance or reinsurance activity as at 31.12.2023. Values in USD thousands.

MCR <sub>NL</sub> Result	C0010		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
	R0010	1,650		
			C0020	C0030
Medical expense insurance and proportional reinsurance	R0020			
Income protection insurance and proportional reinsurance	R0030			
Workers' compensation insurance and proportional reinsurance	R0040			
Motor vehicle liability insurance and proportional reinsurance	R0050	109		
Other motor insurance and proportional reinsurance	R0060	8		
Marine, aviation and transport insurance and proportional reinsurance	R0070	5,365		
Fire and other damage to property insurance and proportional reinsurance	R0080			
General liability insurance and proportional reinsurance	R0090	7,139		1,031
Credit and suretyship insurance and proportional reinsurance	R0100			
Legal expenses insurance and proportional reinsurance	R0110	1,868		89
Assistance and proportional reinsurance	R0120			
Miscellaneous financial loss insurance and proportional reinsurance	R0130			
Non-proportional health reinsurance	R0140			
Non-proportional casualty reinsurance	R0150			
Non-proportional marine, aviation and transport reinsurance	R0160			
Non-proportional property reinsurance	R0170			
<b>Linear formula component for life insurance and reinsurance obligations</b>				
MCR <sub>L</sub> Result	C0040		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
	R0200			
			C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210			
Obligations with profit participation - future discretionary benefits	R0220			
Index-linked and unit-linked insurance obligations	R0230			
Other life (re)insurance and health (re)insurance obligations	R0240			
Total capital at risk for all life (re)insurance obligations	R0250			
<b>Overall MCR calculation</b>				
	C0070			
Linear MCR	R0300	1,650		
SCR	R0310	8,383		
MCR cap	R0320	3,772		
MCR floor	R0330	2,096		
Combined MCR	R0340	2,096		
Absolute floor of the MCR	R0350	4,416		
		C0070		
Minimum Capital Requirement	R0400	4,416		

## 5. Beacon Insurance Company Limited Year End 2024

**Table 39** – BICL IR.02.01.02 Balance Sheet as at 31.12.2024. Values in USD thousands.

**IR.02.01.02**

**Balance sheet**

**Quarterly solo and group, disclosure solo and group**

		Solvency II value
		C0010
<b>Assets</b>		
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	
Deferred tax assets	R0040	
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	10,319
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	
Equities	R0100	
Equities - listed	R0110	
Equities - unlisted	R0120	
Bonds	R0130	10,071
Government Bonds	R0140	407
Corporate Bonds	R0150	9,665
Structured notes	R0160	
Collateralised securities	R0170	
Collective Investments Undertakings	R0180	
Derivatives	R0190	
Deposits other than cash equivalents	R0200	248
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	
Reinsurance recoverables from:	R0270	
Non-life and health similar to non-life	R0280	
Life and health similar to life, excluding index-linked and unit-linked	R0315	
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	845
Reinsurance receivables	R0370	
Receivables (trade, not insurance)	R0380	313
Own shares (held directly)	R0390	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	
Cash and cash equivalents	R0410	242
Any other assets, not elsewhere shown	R0420	
<b>Total assets</b>	<b>R0500</b>	<b>11,719</b>

**Table 39 (Continued)** – BICL IR 02.01.02 Balance Sheet as at 31.12.2024. Values in USD thousands.

<b>Liabilities</b>		
Technical provisions - total	R0505	3,935
Technical provisions - non-life	R0510	3,935
Technical provisions - life	R0515	
Best estimate - total	R0542	3,828
Best estimate - non-life	R0544	3,828
Best estimate - life	R0546	
Risk margin - total	R0552	107
Risk margin - non-life	R0554	107
Risk margin - life	R0556	
Transitional (TMTP) - life	R0565	
Other technical provisions	R0730	
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	
Pension benefit obligations	R0760	
Deposits from reinsurers	R0770	
Deferred tax liabilities	R0780	
Derivatives	R0790	
Debts owed to credit institutions	R0800	
Financial liabilities other than debts owed to credit institutions	R0810	
Insurance & intermediaries payables	R0820	308
Reinsurance payables	R0830	
Payables (trade, not insurance)	R0840	
Subordinated liabilities	R0850	
Subordinated liabilities not in Basic Own Funds	R0860	
Subordinated liabilities in Basic Own Funds	R0870	
Any other liabilities, not elsewhere shown	R0880	59
<b>Total liabilities</b>	<b>R0900</b>	<b>4,302</b>
<b>Excess of assets over liabilities</b>	<b>R1000</b>	<b>7,417</b>

**Table 40** – BICL IR.05.02.01 Premiums, claims and expenses by line of business as at 31.12.2024. Values in USD thousands.

**IR.05.02.01**

**Premiums, claims and expenses by country**

**Annual solo, group and branch, disclosure solo and group**

Home Country - non-life obligations		Top 5 countries (by amount of gross premiums written) - non-life obligations						Total Top 5 and home country - non-life obligations
		Home country						Total Top 5 and home country
		C0080	C0090	C0090	C0090	C0090	C0090	C0140
Country	R0010		DE	CH				
<b>Premiums written</b>								
Gross - Direct Business	R0110							
Gross - Proportional reinsurance accepted	R0120							
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140							
Net	R0200							
<b>Premiums earned</b>								
Gross - Direct Business	R0210							
Gross - Proportional reinsurance accepted	R0220							
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240							
Net	R0300							
<b>Claims incurred</b>								
Gross - Direct Business	R0310							
Gross - Proportional reinsurance accepted	R0320		-166					-166
Gross - Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340							
Net	R0400		-166					-166
<b>Net expenses incurred</b>	R0550	536						536

**Table 41 – BICL IR.05.02.01 Premiums, claims and expenses by country as at 31.12.2024. Values in USD thousands.**

IR.05.04.02  
Non-life income and expenditure  
Annual group, quarterly sets, group and branch, disclosure sets, disclosure group  
IR.05.04.02.01  
Non-life income and expenditure - reporting period

		All businesses (including annuities stemming from accepted non-life insurance and reinsurance contracts)																								Annuities stemming from non-life accepted reinsurance contracts	Annuities stemming from non-life accepted reinsurance contracts
		All non-life businesses (excluding annuities stemming from accepted insurance and reinsurance contracts)																									
		Line of Business for: non-life insurance and accepted proportional reinsurance contracts														Line of Business for: accepted non-proportional reinsurance											
		Line of Business for: non-life insurance and accepted proportional reinsurance contracts														Line of Business for: accepted non-proportional reinsurance											
		Medical expense insurance (lines of business 1 and 13)	Income protection insurance (lines of business 2 and 14)	Workers compensation insurance (lines of business 3 and 14)	Motor vehicle liability insurance - personal lines - (line of business 4)	Insurance - non-personal lines (lines of business 4 and 14)	Motor vehicle other motor insurance - personal lines - (line of business 5)	Motor insurance - non-personal lines (lines of business 5 and 15)	Marine, aviation and transport insurance (lines of business 6 and 16)	Damage to property insurance - personal lines - (line of business 7)	Damage to property insurance - non-personal lines - (line of business 7)	General liability insurance	Credit and suretyship insurance (lines of business 9 and 21)	Legal expenses insurance (lines of business 10 and 22)	Assistance (lines of business 11 and 23)	Miscellaneous financial lines (lines of business 12 and 24)	Health	Casualty	Marine, aviation and transport	Property							
C0010	C0015	C0110	C0115	C0130	C0140	C0141	C0150	C0151	C0160	C0170	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0310	C0320	C0330	C0340				
Income																											
Premiums written																											
Gross written premiums	R0110																										
Gross written premiums - insurance objects	R0111																										
Gross written premiums - accepted reinsurance	R0113																										
Net written premiums	R0105																										
Premiums earned and provision for unearned	R0210																										
Gross earned premiums	R0210																										
Net earned premiums	R0220																										
Expenses																											
Claims incurred																											
Gross under control claims incurred	R0610																										
Gross under control direct business	R0611																										
Gross under control reinsurance accepted	R0612																										
Net under control claims incurred	R0605																										
Net (discounted) claims incurred	R0720																										
Recovery of expenses incurred	R0910																										
Technical expenses incurred net of reinsurance costs	R0905																										
Acquisition costs, commissions, claims management costs	R0905																										
Other expenses	R1140																										
Total expenditure	R1130																										

**Table 42 – BICL S.17.01.02 Non-life technical provisions as at 31.12.2024. Values in USD thousands.**

IR.17.01.02  
Non-life technical provisions  
Quarterly solo and branch, disclosure solo

		Direct business and accepted proportional reinsurance											Accepted non-proportional reinsurance				Total Non-Life obligation	
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance		Non-proportional property reinsurance
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Best estimate																		
Premium provisions																		
Gross	R0060																	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to	R0140																	
Net Best Estimate of Premium Provisions	R0150																	
Claims provisions																		
Gross	R0160					19	3,809											3,828
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to	R0240																	
Net Best Estimate of Claims Provisions	R0250					19	3,809											3,828
Total Best estimate - gross	R0260					19	3,809											3,828
Total Best estimate - net	R0270					19	3,809											3,828
Risk margin	R0280					1	106											107
Technical provisions - total (best estimate plus risk margin)																		
Technical provisions - total	R0320					20	3,915											3,935
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to	R0330																	
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340					20	3,915											3,935

**Table 43** – BICL S.19.01.21 Non-life Insurance Claims Information as at 31.12.2024. Values in USD thousands.

IR.19.01.21  
Non-life Insurance claims  
Disclosure solo

Accident year / U	Z0020	Underwriting year [UWY]
-------------------	-------	----------------------------

Gross Claims Paid (non-cumulative) - Development year. Total Non-Life Business

			1	2	3	4	5	6	7	8	9	10 & +
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100											160
N-9	R0160	77	173	250	84							
N-8	R0170	133	250	164	99							
N-7	R0180	240	475	210	87							
N-6	R0190	175	707	220	32							
N-5	R0200	104	448	234	32	224						
N-4	R0210			141								
N-3	R0220											
N-2	R0230											
N-1	R0240											
N	R0250											

		In Current year	Sum of years (cumulative)
		C0170	C0180
Prior	R0100	160	160
N-9	R0160		584
N-8	R0170		646
N-7	R0180		1,012
N-6	R0190		1,135
N-5	R0200		1,041
N-4	R0210		141
N-3	R0220		
N-2	R0230		
N-1	R0240		
N	R0250		
Total	R0260	160	4,719

Gross undiscounted Best Estimate Claims Provisions - Development year. Total Non-Life Business

			1	2	3	4	5	6	7	8	9	10 & +
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300
Prior	R0100											4,654
N-9	R0160			470	208							
N-8	R0170		755	451	226							
N-7	R0180	1,217	896	474	193							
N-6	R0190	1,461	1,140	729	322							
N-5	R0200	1,179	1,239	893	244	455						
N-4	R0210			737	131							
N-3	R0220											
N-2	R0230											
N-1	R0240											
N	R0250											

		Year end (discounted data)
		C0360
Prior	R0100	3,935
N-9	R0160	
N-8	R0170	
N-7	R0180	
N-6	R0190	
N-5	R0200	
N-4	R0210	
N-3	R0220	
N-2	R0230	
N-1	R0240	
N	R0250	
Total	R0260	3,935

Gross premium

		Gross earned premium at reporting reference date	Estimate of future gross earned premium
		C0570	C0580
Prior	R0100		
N-9	R0160		
N-8	R0170		
N-7	R0180		
N-6	R0190		
N-5	R0200		
N-4	R0210		
N-3	R0220		
N-2	R0230		
N-1	R0240		
N	R0250		



**Table 44 – BICL S.23.01.01 Own funds as at 31.12.2024. Values in USD thousands.**

IR.23.01.01

Own funds

Annual and quarterly solo, disclosure solo

IR.23.01.01.01

Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
<b>Basic own funds</b>						
Ordinary share capital (gross of own shares)	R0010	11,214	11,214			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	-3,797	-3,797			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
<b>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</b>						
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					
<b>Total basic own funds</b>	R0290	7,417	7,417			
<b>Ancillary own funds</b>						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees	R0340					
Letters of credit and guarantees other	R0350					
Supplementary members calls	R0360					
Supplementary members calls - other	R0370					
Other ancillary own funds	R0390					
<b>Total ancillary own funds</b>	R0400					
<b>Available and eligible own funds</b>						
Total available own funds to meet the SCR	R0500	7,417	7,417			
Total available own funds to meet the MCR	R0510	7,417	7,417			
Total eligible own funds to meet the SCR	R0540	7,417	7,417			
Total eligible own funds to meet the MCR	R0550	7,417	7,417			
<b>SCR</b>	R0580	1,904				
<b>MCR</b>	R0600	4,140				
<b>Ratio of Eligible own funds to SCR</b>	R0620	389.62%				
<b>Ratio of Eligible own funds to MCR</b>	R0640	179.14%				

IR.23.01.01.02

Reconciliation reserve

		C0060
<b>Reconciliation reserve</b>		
Excess of assets over liabilities	R0700	7,417
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Deductions for participations in financial and credit institutions	R0725	
Other basic own fund items	R0730	11,214
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
<b>Reconciliation reserve</b>	R0760	-3,797

**Table 45** – BICL S.25.01.21 Solvency Capital Requirement as at 31.12.2023. Values in USD thousands.

IR.25.04.21

Solvency Capital Requirement

Disclosure solo

Rows		C0010
Net of loss-absorbing capacity of technical provisions		
Market risk	R0140	944
Interest rate risk	R0070	577
Equity risk	R0080	
Property risk	R0090	
Spread risk	R0100	662
Concentration risk	R0110	55
Currency risk	R0120	152
Other market risk	R0125	
Diversification within market risk	R0130	-502
Counterparty default risk	R0180	73
Type 1 exposures	R0150	73
Type 2 exposures	R0160	
Other counterparty risk	R0165	
Diversification within counterparty default risk	R0170	
Life underwriting risk	R0270	
Mortality risk	R0190	
Longevity risk	R0200	
Disability-Morbidity risk	R0210	
Life-expense risk	R0220	
Revision risk	R0230	
Lapse risk	R0240	
Life catastrophe risk	R0250	
Other life underwriting risk	R0255	
Diversification within life underwriting risk	R0260	
Total health underwriting risk	R0320	
Health SLT risk	R0280	
Health non SLT risk	R0290	
Health catastrophe risk	R0300	
Other health underwriting risk	R0305	
Diversification within health underwriting risk	R0310	
Non-life underwriting risk	R0370	1,258
Non-life premium and reserve risk (ex catastrophe risk)	R0330	1,258
Non-life catastrophe risk	R0340	
Lapse risk	R0350	
Other non-life underwriting risk	R0355	
Diversification within non-life underwriting risk	R0360	
Intangible asset risk	R0400	
Operational and other risks	R0430	115
Operational risk	R0422	115
Other risks	R0424	
Total before all diversification	R0432	2,892
Total before diversification between risk modules	R0434	2,390
Diversification between risk modules	R0436	-487
Total after diversification	R0438	1,904
Loss-absorbing capacity of technical provisions	R0440	
Loss-absorbing capacity of deferred taxes	R0450	
Other adjustments	R0455	
Solvency capital requirement including undisclosed capital add-on	R0460	1,904
Disclosed capital add-on - excluding residual model limitation	R0472	
Disclosed capital add-on - residual model limitation	R0474	
<b>Solvency capital requirement including capital add-on</b>	<b>R0480</b>	<b>1,904</b>
Biting interest rate scenario	R0490	Increase
Biting life lapse scenario	R0495	

**Table 46** – BICL S.28.01.22 Minimum Capital Requirement – Only life or non-life insurance or reinsurance activity as at 31.12.2024. Values in USD thousands.

**IR.28.01.01**
**Minimum Capital Requirement - Only life or only non-life activity**
**Annual solo , disclosure solo**
**Linear formula component for non-life insurance and reinsurance obligations**

		C0010
MCR <sub>NL</sub> Result	R0010	394

**Background information**

		Background information	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020		
Income protection insurance and proportional reinsurance	R0030		
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050		
Other motor insurance and proportional reinsurance	R0060	19	
Marine, aviation and transport insurance and proportional reinsurance	R0070	3,809	
Fire and other damage to property insurance and proportional reinsurance	R0080		
General liability insurance and proportional reinsurance	R0090		
Credit and suretyship insurance and proportional reinsurance	R0100		
Legal expenses insurance and proportional reinsurance	R0110		
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130		
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150		
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170		

**Linear formula component for life insurance and reinsurance obligations**

		C0040
MCR <sub>L</sub> Result	R0200	

**Total capital at risk for all life (re)insurance obligations**

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

**Overall MCR calculation**

		C0070
Linear MCR	R0300	394
SCR	R0310	1,904
MCR cap	R0320	857
MCR floor	R0330	476
Combined MCR	R0340	476
Absolute floor of the MCR	R0350	4,140
<b>Minimum Capital Requirement</b>	<b>R0400</b>	<b>4,140</b>

## 6. Beacon Insurance Company Limited Year End 2023

**Table 47** – BICL S.02.01.02 Balance Sheet as at 31.12.2023. Values in USD thousands.

		Solvency II value
		C0010
<b>Assets</b>		
Intangible assets	<b>R0030</b>	
Deferred tax assets	<b>R0040</b>	
Pension benefit surplus	<b>R0050</b>	
Property, plant & equipment held for own use	<b>R0060</b>	
Investments (other than assets held for index-linked and unit-linked contracts)	<b>R0070</b>	10,809
Property (other than for own use)	<b>R0080</b>	254
Holdings in related undertakings, including participations	<b>R0090</b>	
Equities	<b>R0100</b>	
Equities - listed	<b>R0110</b>	
Equities - unlisted	<b>R0120</b>	
Bonds	<b>R0130</b>	10,237
Government Bonds	<b>R0140</b>	363
Corporate Bonds	<b>R0150</b>	9,875
Structured notes	<b>R0160</b>	
Collateralised securities	<b>R0170</b>	
Collective Investments Undertakings	<b>R0180</b>	
Derivatives	<b>R0190</b>	
Deposits other than cash equivalents	<b>R0200</b>	317
Other investments	<b>R0210</b>	
Assets held for index-linked and unit-linked contracts	<b>R0220</b>	
Loans and mortgages	<b>R0230</b>	
Loans on policies	<b>R0240</b>	
Loans and mortgages to individuals	<b>R0250</b>	
Other loans and mortgages	<b>R0260</b>	
Reinsurance recoverables from:	<b>R0270</b>	
Non-life and health similar to non-life	<b>R0280</b>	
Non-life excluding health	<b>R0290</b>	
Health similar to non-life	<b>R0300</b>	
Life and health similar to life, excluding health and index-linked and unit-linked	<b>R0310</b>	
Health similar to life	<b>R0320</b>	
Life excluding health and index-linked and unit-linked	<b>R0330</b>	
Life index-linked and unit-linked	<b>R0340</b>	
Deposits to cedants	<b>R0350</b>	
Insurance and intermediaries receivables	<b>R0360</b>	845
Reinsurance receivables	<b>R0370</b>	659
Receivables (trade, not insurance)	<b>R0380</b>	0
Own shares (held directly)	<b>R0390</b>	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	<b>R0400</b>	
Cash and cash equivalents	<b>R0410</b>	247
Any other assets, not elsewhere shown	<b>R0420</b>	0
<b>Total assets</b>	<b>R0500</b>	12,560

**Table 47 (Continued)** – BICL S.02.01.02 Balance Sheet as at 31.12.2023. Values in USD thousands.

	Solvency II value
	C0010
<b>Liabilities</b>	
Technical provisions – non-life	<b>R0510</b> 5,107
Technical provisions – non-life (excluding health)	<b>R0520</b> 5,107
TP calculated as a whole	<b>R0530</b>
Best Estimate	<b>R0540</b> 4,916
Risk margin	<b>R0550</b> 191
Technical provisions - health (similar to non-life)	<b>R0560</b>
TP calculated as a whole	<b>R0570</b>
Best Estimate	<b>R0580</b>
Risk margin	<b>R0590</b>
Technical provisions - life (excluding index-linked and unit-linked)	<b>R0600</b>
Technical provisions - health (similar to life)	<b>R0610</b>
TP calculated as a whole	<b>R0620</b>
Best Estimate	<b>R0630</b>
Risk margin	<b>R0640</b>
Technical provisions – life (excluding health and index-linked and unit-linked)	<b>R0650</b>
TP calculated as a whole	<b>R0660</b>
Best Estimate	<b>R0670</b>
Risk margin	<b>R0680</b>
Technical provisions – index-linked and unit-linked	<b>R0690</b>
TP calculated as a whole	<b>R0700</b>
Best Estimate	<b>R0710</b>
Risk margin	<b>R0720</b>
Contingent liabilities	<b>R0740</b>
Provisions other than technical provisions	<b>R0750</b>
Pension benefit obligations	<b>R0760</b>
Deposits from reinsurers	<b>R0770</b>
Deferred tax liabilities	<b>R0780</b>
Derivatives	<b>R0790</b>
Debts owed to credit institutions	<b>R0800</b>
Financial liabilities other than debts owed to credit institutions	<b>R0810</b>
Insurance & intermediaries payables	<b>R0820</b>
Reinsurance payables	<b>R0830</b> 233
Payables (trade, not insurance)	<b>R0840</b>
Subordinated liabilities	<b>R0850</b>
Subordinated liabilities not in BOF	<b>R0860</b>
Subordinated liabilities in BOF	<b>R0870</b>
Any other liabilities, not elsewhere shown	<b>R0880</b> 268
<b>Total liabilities</b>	<b>R0900</b> 5,609
<b>Excess of assets over liabilities</b>	<b>R1000</b> 6,951

**Table 48** – BICL S.05.01.02 Premiums, claims and expenses by line of business as at 31.12.2023. Values in USD thousands.

	Line of Business for: <b>non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)</b>												Line of business for:				Total
	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	
<b>Premiums written</b>																	
Gross - Direct Business	R0110																
Gross - Proportional reinsurance accepted	R0120					-6	-4										-10
Gross - Non-proportional reinsurance accepted	R0130																
Reinsurers' share	R0140																
Net	R0200					-6	-4										-10
<b>Premiums earned</b>																	
Gross - Direct Business	R0210																
Gross - Proportional reinsurance accepted	R0220					-6	-4										-9
Gross - Non-proportional reinsurance accepted	R0230																
Reinsurers' share	R0240																
Net	R0300					-6	-4										-9
<b>Claims incurred</b>																	
Gross - Direct Business	R0310																
Gross - Proportional reinsurance accepted	R0320					-9	-65										-75
Gross - Non-proportional reinsurance accepted	R0330																
Reinsurers' share	R0340																
Net	R0400					-9	-65										-75
<b>Changes in other technical provisions</b>																	
Gross - Direct Business	R0410				-80												-80
Gross - Proportional reinsurance accepted	R0420																
Gross - Non- proportional reinsurance accepted	R0430																
Reinsurers' share	R0440																
Net	R0500				-80												-80
<b>Expenses incurred</b>	R0550				46	715	103										864
<b>Other expenses</b>	R1200																
<b>Total expenses</b>	R1300																864

**Table 49** – BICL S.05.02.01 Premiums, claims and expenses by country as at 31.12.2023. Values in USD thousands.

		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		DE	CH				
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
<b>Premiums written</b>								
Gross - Direct Business	R0110							
Gross - Proportional reinsurance accepted	R0120		0					0
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140							
Net	R0200		0					0
<b>Premiums earned</b>								
Gross - Direct Business	R0210							
Gross - Proportional reinsurance accepted	R0220		-9					-9
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240							
Net	R0300		-9					-9
<b>Claims incurred</b>								
Gross - Direct Business	R0310							
Gross - Proportional reinsurance accepted	R0320		-75					-75
Gross - Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340							
Net	R0400		-75					-75
<b>Changes in other technical provisions</b>								
Gross - Direct Business	R0410			-80				-80
Gross - Proportional reinsurance accepted	R0420							
Gross - Non- proportional reinsurance accepted	R0430							
Reinsurers'share	R0440							
Net	R0500			-80				-80
<b>Expenses incurred</b>	R0550	782		46				828
<b>Other expenses</b>	R1200							
<b>Total expenses</b>	R1300							828



**Table 50 – BICL S.17.01.02 Non-life technical provisions as at 31.12.2023. Values in USD thousands.**

		Direct business and accepted proportional reinsurance											Accepted non-proportional reinsurance				Total Non-Life obligation	
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance		Non-proportional property reinsurance
		C'0020	C'0030	C'0040	C'0050	C'0060	C'0070	C'0080	C'0090	C'0100	C'0110	C'0120	C'0130	C'0140	C'0150	C'0160	C'0170	C'0180
Technical provisions calculated as a whole	R0010																	
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050																	
Technical provisions calculated as a sum of BE and RM																		
Best estimate																		
Premium provisions																		
Gross	R0060																	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140																	
Net Best Estimate of Premium Provisions	R0150																	
Claims provisions																		
Gross	R0160					70	4,722	124										4,916
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240																	
Net Best Estimate of Claims Provisions	R0250					70	4,722	124										4,916
Total Best estimate - gross	R0260					70	4,722	124										4,916
Total Best estimate - net	R0270					70	4,722	124										4,916
Risk margin	R0280					3	184	5										191
Amount of the transitional on Technical Provisions																		
Technical Provisions calculated as a whole	R0290																	
Best estimate	R0300																	
Risk margin	R0310																	
Technical provisions - total																		
Technical provisions - total	R0320					73	4,905	129										5,107
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330																	
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340					73	4,905	129										5,107

**Table 51** – BICL S.19.01.21 Non-life Insurance Claims Information as at 31.12.2023. Values in USD thousands.

Accident year /  
Underwriting year

<b>Z0020</b>	Underwriting year [UWY]
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**Gross Claims Paid (non-cumulative)**  
(absolute amount)

	Year	Development year										In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0170	C0180
Prior	R0100											308	308
2014	R0160	71	158	47	11								287
2015	R0170	77	173	250	84								584
2016	R0180	133	250	164	99								646
2017	R0190	240	475	210	87								1,012
2018	R0200	175	707	220	32								1,135
2019	R0210	104	448	234	32	224						224	1,041
2020	R0220			180									180
2021	R0230												
2022	R0240												
2023	R0250												
Total												R0260	5,193

**Gross undiscounted Best Estimate Claims Provisions**  
(absolute amount)

Development year												Year end (discounted data)	
Year		1	2	3	4	5	6	7	8	9	10 & +		
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	
Prior	R0100										5,208	R0100	4,600
2014	R0160			197	5	5	6	6	6	73		R0160	73
2015	R0170		470	208								R0170	
2016	R0180	755	451	226								R0180	
2017	R0190	1,217	896	474	193							R0190	
2018	R0200	1,461	1,140	729	322							R0200	
2019	R0210	1,179	1,239	893	244	455						R0210	435
2020	R0220		737									R0220	
2021	R0230											R0230	
2022	R0240											R0240	
2023	R0250											R0250	
Total												R0260	5,107

**Table 52 – BICL S.23.01.01 Own funds as at 31.12.2023. Values in USD thousands.**

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35</b>					
Ordinary share capital (gross of own shares)	R0010	11,214	11,214		
Share premium account related to ordinary share capital	R0030				
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040				
Subordinated mutual member accounts	R0050				
Surplus funds	R0070				
Preference shares	R0090				
Share premium account related to preference shares	R0110				
Reconciliation reserve	R0130	-4,263	-4,263		
Subordinated liabilities	R0140				
An amount equal to the value of net deferred tax assets	R0160				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180				
<b>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</b>					
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				
<b>Deductions</b>					
Deductions for participations in financial and credit institutions	R0230				
<b>Total basic own funds after deductions</b>	R0290	6,951	6,951		
<b>Ancillary own funds</b>					
Unpaid and uncalled ordinary share capital callable on demand	R0300				
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310				
Unpaid and uncalled preference shares callable on demand	R0320				
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330				
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340				
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350				
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360				
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370				
Other ancillary own funds	R0390				
<b>Total ancillary own funds</b>	R0400				
<b>Available and eligible own funds</b>					
Total available own funds to meet the SCR	R0500	6,951	6,951		
Total available own funds to meet the MCR	R0510	6,951	6,951		
Total eligible own funds to meet the SCR	R0540	6,951	6,951		
Total eligible own funds to meet the MCR	R0550	6,951	6,951		
<b>SCR</b>	R0580	2,222			
<b>MCR</b>	R0600	4,248			
<b>Ratio of Eligible own funds to SCR</b>	R0620	312.79%			
<b>Ratio of Eligible own funds to MCR</b>	R0640	163.66%			
<b>Reconciliation reserve</b>					
Excess of assets over liabilities	R0700	6,951			
Own shares (held directly and indirectly)	R0710				
Foreseeable dividends, distributions and charges	R0720				
Other basic own fund items	R0730	11,214			
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740				
<b>Reconciliation reserve</b>	R0760	-4,263			
<b>Expected profits</b>					
Expected profits included in future premiums (EPIFP) - Life business	R0770				
Expected profits included in future premiums (EPIFP) - Non- life business	R0780				
<b>Total Expected profits included in future premiums (EPIFP)</b>	R0790				

**Table 53** – BICL S.25.01.21 Solvency Capital Requirement as at 31.12.2023. Values in USD thousands.

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
Market risk	R0010 951		
Counterparty default risk	R0020 85		
Life underwriting risk	R0030		
Health underwriting risk	R0040		
Non-life underwriting risk	R0050 1,572		
Diversification	R0060 -533		
Intangible asset risk	R0070		
<b>Basic Solvency Capital Requirement</b>	R0100 2,075		
<b>Calculation of Solvency Capital Requirement</b>	C0100		
Operational risk	R0130 147		
Loss-absorbing capacity of technical provisions	R0140		
Loss-absorbing capacity of deferred taxes	R0150		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160		
<b>Solvency capital requirement excluding capital add-on</b>	R0200 2,222		
Capital add-on already set	R0210		
<b>Solvency capital requirement</b>	R0220 2,222		
<b>Other information on SCR</b>			
Capital requirement for duration-based equity risk sub-module	R0400		
Total amount of Notional Solvency Capital Requirement for remaining part	R0410		
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420		
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430		
Diversification effects due to RFF nSCR aggregation for article 304	R0440		
<b>Approach to tax rate</b>	Yes/No		
Approach based on average tax rate	R0590 C0109		
<b>Calculation of loss absorbing capacity of deferred taxes</b>	LAC DT		
LAC DT	R0640 C0130		
LAC DT justified by reversion of deferred tax liabilities	R0650		
LAC DT justified by reference to probable future taxable economic profit	R0660		
LAC DT justified by carry back, current year	R0670		
LAC DT justified by carry back, future years	R0680		
Maximum LAC DT	R0690		

**Table 54 – BICL S.28.01.22 Minimum Capital Requirement – Only life or non-life insurance or reinsurance activity as at 31.12.2023. Values in USD thousands.**

MCR <sub>NL</sub> Result	C0010	
	R0010	503

	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
	C0020	C0030
Medical expense insurance and proportional reinsurance	R0020	
Income protection insurance and proportional reinsurance	R0030	
Workers' compensation insurance and proportional reinsurance	R0040	
Motor vehicle liability insurance and proportional reinsurance	R0050	
Other motor insurance and proportional reinsurance	R0060	70
Marine, aviation and transport insurance and proportional reinsurance	R0070	4,722
Fire and other damage to property insurance and proportional reinsurance	R0080	124
General liability insurance and proportional reinsurance	R0090	
Credit and suretyship insurance and proportional reinsurance	R0100	
Legal expenses insurance and proportional reinsurance	R0110	
Assistance and proportional reinsurance	R0120	
Miscellaneous financial loss insurance and proportional reinsurance	R0130	
Non-proportional health reinsurance	R0140	
Non-proportional casualty reinsurance	R0150	
Non-proportional marine, aviation and transport reinsurance	R0160	
Non-proportional property reinsurance	R0170	

Linear formula component for life insurance and reinsurance obligations		
MCR <sub>L</sub> Result	C0040	
	R0200	

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

Overall MCR calculation		
	C0070	
Linear MCR	R0300	503
SCR	R0310	2,222
MCR cap	R0320	1,000
MCR floor	R0330	556
Combined MCR	R0340	556
Absolute floor of the MCR	R0350	4,248
	C0070	
Minimum Capital Requirement	R0400	4,248