redsands
group holdings

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Solvency & Financial Condition Report

For the year ending 31 December 2024

Red Sands Group Holdings Limited
Red Sands Insurance Company (Europe) Limited
Red Sands Life Assurance Company (Europe) Limited

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Introduction

This document is a public disclosure of the solvency and financial condition of Red Sands Group Holdings Limited in accordance with section 52 of the Financial Services (Insurance Companies) Regulations 2020 ("Solvency II Directive").

The Solvency II reporting currency of this report is Pound Sterling (GBP).

This document has been approved by the Boards of Directors of Red Sands Group Holdings Limited, Red Sands Life Assurance Company (Europe) Limited and Red Sands Insurance Company (Europe) Limited.

A. Business & Performance

A.1 Business

Red Sands Group Holdings Limited ("RSG") holds 100% of the ordinary shares in Red Sands Insurance Company (Europe) Limited ("RSE") and Red Sands Life Assurance Company (Europe) Limited ("RSL"). As a collective, these are referred to as the "Red Sands Group".

RSE is a diversified personal lines insurance company. The strategy of the insurer is to focus on niche, high volume business lines that generally have low severity exposure profiles. RSE had a solvency cover ratio of 209.7% as at 31st December 2024 and total profit after tax of £44.9m for the year then ending.

Following the corporate transaction involving Animal Friends Investments Ltd ("AFI") as disclosed in the Solvency and Financial Condition Report for the year ended 31 December 2023, RSE ceased underwriting new pet policies distributed by AFI as at 27 February 2025, and executed a 100% reinsurance to close arrangement effective 1 January 2025.

Following the Voluntary Undertaking signed on 7th February 2024 in respect of GAP products as disclosed in the Solvency and Financial Condition Report for the year ended 31 December 2023, RSE has undertaken considerable changes to its corporate organisation, people, systems and governance structures, and this work continues into 2025. The Company continues to work with its regulators and has submitted a revised product assessment in relation to the GAP product for approval in 2025.

RSL has historically been a life insurance company selling uncomplicated life assurance policies in Central and Eastern Europe via direct-to-consumer strategies. As a consequence of the UK (and Gibraltar's) decision to leave the European Union and following a commutation of its reinsurance arrangements in June 2024, the Company is now in solvent run-off. RSL had a solvency cover ratio of 255.5% as at 31st December 2024 and total profit after tax of £1.2m for the year then ending.

RSG is a group holding company that writes no business and holds only the shares in RSE and RSL and maintains a bank account to meet operational expenses. RSG is a wholly-owned subsidiary of Cert. Holdings Limited ("Cert. Holdings") (previous name Manzillo Holdings Limited), a company registered in Guernsey. The Jaap t'Hooft Trust is the ultimate controlling party. RSG had a solvency cover ratio of 242.9% as at 31st December 2024 and total profit after tax of £46.2m for the year then ending.

This SFCR provides information regarding RSE, RSL, and the Red Sands Group.

RSE, RSL and RSG are incorporated in Gibraltar. The location of these businesses is:

Level 3, Ocean Village Business Centre
23 Ocean Village Promenade
Gibraltar

The supervisory authority responsible for financial supervision of RSE, RSL, RSG and the Red Sands Group is:

Gibraltar Financial Services Commission
PO Box 940
Suite 3, Ground Floor
Atlantic Suites
Gibraltar
Telephone: (+350) 200 40 283

The external auditor of RSE, RSL, RSG and Red Sands Group is:

EY Limited
Suite 3C, Regal House
Queensway
Gibraltar
Telephone: (+350) 200 13 200

The active lines of business that RSE underwrites are:

- Bicycle insurance
- Guaranteed Asset Protection
- Home and Contents Insurance
- Insurance Backed Guarantees
- Motor Dent & Scratch
- Motor Warranty
- Pet Insurance
- Travel Insurance

RSE sells general insurance policies through distributors in the United Kingdom. RSL has entered solvent run-off.

Red Sands operates entirely out of Gibraltar. RSE, RSL and RSG share a common staff base employed by RSE. The governance and operations processes in place are common across RSE, RSL and RSG.

The only intra-group transaction between the Red Sands companies is a management charge from RSE to RSL for a proportion of the cost of staff and services provided.

A.2 Underwriting Performance

RSE

Throughout 2024 RSE continued its strategic objective of supporting its established distribution partners and is pleased to report that this continued focus produced positive results.

Gross written premium increased by 9.0% from £368.0m to £401.1m with profit after tax for the current year of £44.9m. A breakdown by line of business is given below.

Figures in GBPm	Miscellaneous Financial Loss		Credit & Suretyship		Property		Travel		Motor: Other	
	Dec 24	Dec 23	Dec 24	Dec 23	Dec 24	Dec 23	Dec 24	Dec 23	Dec 24	Dec 23
Gross Written Premium	341.5	302.1	2.6	2.3	23.9	18.2	30.6	23.5	2.5	22.0

RSE's technical result for 2024 was £44.1m with a net underwriting margin of 11.7% and a net combined ratio of 88.3%.

The Appendix contains certain quantitative reporting templates. IR.05.04.01 ('Non-life income, expenditure and business model analysis: reporting period') on pages 41-44 provides quantitative information on the underwriting performance of RSE by material lines of business. IR.05.02.01 ('Premiums, claims and expenses by country) on page 40 provides quantitative information on the underwriting performance of RSE by material geographic area.

RSL

RSL has now entered solvent run-off in all EU territories which it previously conducted business, having commuted its remaining Polish reinsurance business in accordance with a Commutation and Release agreement signed in 2024.

Gross Written Premium in 2024 decreased to £13.6m compared to £20.5m in 2023 with profit after tax for the current year of £1.2m.

The Appendix contains certain quantitative reporting templates. IR.05.03.01 ('Life income and expenditure') on pages 53 and 54 provides quantitative information on the underwriting performance of RSL by material lines of business. IR.05.02.01.04 ('Premiums, claims and expenses by country – Life obligations) on page 55 provide quantitative information on the underwriting performance of RSL by material geographic area.

A.3 Investment Performance

The investment strategy of the Group is to buy-and-hold according to a strategic assets allocation which considers capital efficiency and short-and-long term cash flow needs under stressed conditions. As such, the Group's investment performance has broadly performed ahead of its benchmark through 2024. Below is a table that summarises the investment performance, after investment management expenses and charges, for the year of RSE and RSL.

Investment Income (Figures in GBP m)	Year ending Dec 24	Year ending Dec 23
RSE	8.7	6.9
Cash and deposits	2.7	1.2
Loans	1.5	1.7
Government debt securities	0.8	0.7
Corporate debt securities	1.4	1.4
Shares and collective investment funds	2.6	2.1

Investment management fees	(0.3)	(0.2)
Unlisted Equity	-	-
Property	-	-
RSL	1.5	1.4
Cash and deposits	0.4	0.5
Corporate debt securities	0.4	0.7
Shares and collective investment funds	0.8	0.3
Investment management fees	(0.1)	(0.1)

None of the entities in the Red Sands Group had any investments in securitisation and none of the gains or losses from investments have been recognised directly in equity

RSE and RSL, through the Investment Committees, continue to proactively manage the risk profile of their investments. The Investment Committees continue to work closely with the team of independent investment consultants in ensuring the portfolios meet the requirements of the Companies.

A.4 Performance of Other Activities

There is no other material income or associated expenses.

A.5 Any Other Information

A.5.1 Inflationary Pressures

Red Sands Group has monitored inflationary pressures for some time given the expectation of supply side shocks arising from the implementation of the Trade and Cooperation Agreement between the United Kingdom and the European Union as a result of Brexit (see section A.5.2). Inflation has also been present as a result of various geopolitical events from 2022 to date. While there have been expectations of inflation and cost of living pressures easing, they continue to affect consumer behaviours in the Group's key markets and the ability of individuals to continue to utilise insurance products as a means of protection, given the financial pressures placed upon them. Inflationary pressures remain high on the agenda given the recent increases in global trade barriers and tariffs, which have the potential for increasing costs and disrupting well established supply chains.

Given the ongoing macro-economic, geopolitical outlook and heightened economic uncertainty, the Group continues to monitor inflation in relation to claims experience and in particular the impact on policyholder renewal persistency and the possibility that this may lead to further weakness and recessionary pressures in the longer term.

A.5.2 Brexit

Both RSE and RSL has obtained recognition in all European Union host state territories in which it has risk exposures, in order to ensure that policyholders are not adversely affected by Gibraltar's exit from the European Union.

The majority of Red Sands's business is in the United Kingdom. Gibraltar continues to enjoy access to the United Kingdom market and therefore there has not been any impact on the

Companies' core lines of business. The Trade and Cooperation Agreement signed between the United Kingdom and the European Union introduced a number of non-tariff barriers to trade. Previous versions of our Solvency and Financial Condition Report have highlighted the risks of short and medium term inflationary pressures in the United Kingdom as a result of supply side shocks arising from Brexit, and the Boards' continue to monitor the UK specific impact of this alongside the greater inflation risk from the global macro-economic and geo-political environment (see A.5.1).

Furthermore, the European Union and the United Kingdom continue to negotiate a treaty in respect of maintaining fluidity at the border between Gibraltar and Spain. The existence or lack of such a treaty has no impact on the ability of either RSE or RSL in fulfilling its insurance contracts, but may lead to operational stresses. Red Sands is well placed to manage these operational stresses in the short term, and is in the process of planning in the event that the negotiating parties fail to secure agreement on a treaty.

A.5.3 COVID-19

RSL has active life and health insurance contracts and has been directly impacted by changes in mortality arising from the pandemic. While the immediate impacts of the pandemic have largely passed, RSL continues to monitor the long-term impacts on general population mortality and health as a result of the significant changes in behaviours during the pandemic.

A.5.4 Group Regulation

The Gibraltar Financial Services Commission have communicated their intention to cease regulating the Group at Red Sands Group level and regulate the wider group. In order to aid this process, the group submitted a change of control application to effect a group restructure in May 2025. While this will have no impact on RSE's or RSL's policyholders, this will change the nature of this report in future years which will consider the solvency of RSE, RSL and the consolidated wider group incorporating Red Sands Group's sister companies based in Australia and Sweden.

A.5.5 Other

There is no other material information regarding the business and performance of Red Sands Group.

B. System of Governance

B.1 General Information on the system of governance

The executive management body of the Red Sands Group comprises of the roles detailed in the table below.

Roles	Responsibility
Managing Director	Delivery of strategy and budget within risk tolerance levels set by the Board
Finance Director	Responsible for management of finance function, overseeing the preparation and presentation of all financial accounts, monitoring of solvency capital
Underwriting Director	Responsible for management of underwriting and claims functions
Chief Operations Officer - Executive Director	Responsible for management of the actuarial function, information security and providing oversight of the Red Sands Group's operations
Company Secretary	Administration of corporate matters
Head of Compliance	Regulatory and non-regulatory compliance
Head of Consumer	Responsible for overseeing and implementing the Product Governance Framework and drive continued improvements in the customer journey and experience
Head of Claims	Responsible for overseeing and managing claims processes and performance

The executive management body is accountable to each of the Red Sands Board of Directors (the "Boards"). The Boards consists of the executive Managing Director, executive Directors, a non-executive Chair, and independent non-executive Directors supported by the Company Secretary.

RSE, RSL and RSG each have the same four non-executive directors.

The Boards are collectively responsible for safeguarding the interests of their policyholders, employees, and other stakeholders to whom the Boards are responsible. This is done by setting the strategic direction of each Company congruent with the wider Red Sands Group strategic plan and ensuring that each Company has robust systems of governance, internal controls, and an adequate risk management system in place to reach its strategic goals.

The Boards are responsible to ensure that the Executive Management delivers on the agreed strategic plans, by offering guidance, providing constructive challenge and holding Executive Management to account on the set goals and objectives.

To assist with the discharge of its duties, the Boards have delegated its authority to various Committees, each with their own Terms of Reference which sets out the tasks and authorities delegated by the Boards, as well as details other functions of the relevant Committee, including such matters as composition, conduct of meetings, reporting lines, frequency of Committee meetings and frequency of reporting to the Boards.

The Boards have established five separate Committee types:

- Audit Committee
- Investment Committee
- Risk Committee
- Product Oversight and Governance Committee
- Underwriting Committee

The Audit Committee is a single Committee established by RSG to oversee the activities of the Red Sands entities, whereas the Investment, Risk and Underwriting Committees are established separately by the RSE and RSL Boards. The Product Oversight and Governance Committee has been established only by RSE with the intent that RSL will establish an equivalent committee by the time that Gibraltar's Financial Services (Core Principles and Consumer Duty) Regulations are extended to apply to the relevant business.

Audit Committee (RSG)

The members of the Committee are appointed by the RSG Board of Directors and as at 31 December 2024 comprised two independent Non-Executive Directors and the independent Non-Executive Chair of the Board. The Board of Directors annually considers the independence of its Non-Executive Directors and whether the Committee has access to appropriate financial and audit expertise either within its membership or available to it in an advisory capacity.

The prime functions of the Committee, as evidenced in its TOR's, are:

- Oversee financial reporting and monitor the integrity of the financial statements and any other formal statements relating to its financial performance;
- Review internal financial controls systems;
- Oversee the internal audit function and the relationship with external auditors;
- Assist the Board with any other matter delegated to it by the Board.

The Committee holds a minimum of four scheduled meetings a year and further meetings are held as required. A majority of Committee members need to be present in order for a meeting to be valid and after each Committee meeting, a report is prepared and tabled at the next meeting of the Board of Directors.

Investment Committees (RSE and RSL)

The members of the Committees are appointed by the relevant Board of Directors. The membership of the Committees is not less than four and not more than eight individuals, and requires four members in order to be quorate – including at least one member who must be a Director of the Company which constituted the Committee and one member from the external Investment Advisor.

The Investment Committees' primary responsibilities, as evidenced in their TOR's, are:

- The management of the assets of the Companies such that regulatory solvency requirements and any internal requirements decided upon by the Boards from time-to-time are met, while making optimal use of Capital;
- Management of cash flow and liquidity position of the Companies; and

- Ensuring that liabilities are backed by assets of a suitable nature and class.

After each Committee meeting, a report is prepared and tabled at the next meeting of the Boards, with an update provided at Audit Committee meetings as required.

Risk Committees (RSE and RSL)

The members of the Committees are appointed by the relevant Board of Directors and as at 31 December 2024 comprised the Managing Director, three Executive Directors and one Non-Executive Director, being the Chair of the Audit Committee.

The role of the Risk Committee is to oversee the Risk Management Function, which is managed on a day-to-day basis by the Risk Management Function Holder and the executive management team and provide oversight and advice to the Boards in relation to current and potential future risk exposures of the Red Sands Group and wider distribution group as well as on the risk strategy, taking into account the Board's overall risk appetite. The Risk Committee is also charged with monitoring the exposures to product risk and reporting the results of the periodic product risk assessments to the Board.

The Risk Committee's role also includes the oversight and interpretation of assurance from internal and external assurance providers regarding the effectiveness of the risk management process and works with the executive to address any recommendations that relate to improvements to the risk management framework.

A report is prepared and tabled at every meeting of the Boards detailing the activities of the Risk Committee, with an update also provided at Audit Committee meetings as required.

As noted in section B.3, the existence of Risk Committees does not mean that they are responsible for the management of risk of the Companies. Risk management is a collective responsibility of all individuals and remains the responsibility of the Boards and Senior Management, managed primarily via the safeguarding of exceptional culture and values throughout the organisation, as well as through the operation of an appropriate control environment. However, the Risk Committees have a role alongside the Boards and Senior Management in promoting a risk awareness culture and alignment of actions with values within the Red Sands Group and the wider distribution group.

Product Oversight and Governance Committee (RSE only)

The POG supports the Board in fulfilling its duties to deliver good customer outcomes. The members of the Committee are appointed by the RSE Board of Directors and as at 31 December 2024 comprised two Executive Directors, two senior members of the team and the Consumer Duty Champion, being the Non-Executive Chair of the Board.

The POG overarching role of the POG shall be to review the strategy of and provide oversight of RSE's Product Oversight and Governance requirements as required under regulation. In performing this role, the Committee considers Consumer Duty and PROD 4 risk, the measurement and justification of Consumer Value, Consumer Duty training effectiveness, group strategic plans for embedding Consumer Value and product design, approval and distribution.

A report is prepared and tabled at every meeting of the Boards detailing the activities of the Committee, with an update also provided to the Risk Committee, Underwriting Committee and Audit Committee as required.

Underwriting Committee (RSE and RSL)

The members of the Committees are appointed by the relevant Board of Directors and as at 31 December 2024 comprised the Managing Director, the Underwriting Director, a senior member of the underwriting team and the Chair of the Board.

The overarching role of the Underwriting Committees, as evidenced in its TOR's, is to review the strategy of, and provide oversight of, the companies underwriting and claims operations. In performing this role, the Committees consider risk appetite, risk aggregation, strategic objectives of the Group in relation to the development of the underwriting book, underwriting and claim management, reinsurance strategy and underwriting performance.

The Underwriting Committees also consider the work undertaken by the Product Oversight and Governance Committee and compliance with regulations and directives related to the distribution of insurance products.

A report is prepared and tabled at every meeting of the Boards detailing the activities of the Committees, with an update also provided to the Audit Committee as required.

Remuneration, Performance & Pension

The non-executive directors are paid a fixed fee for their services which is bench-marked to standard market rates. Executive directors and members of staff are paid on a fixed remuneration basis plus an annual bonus. There is a remuneration policy in place to ensure benchmarking is done regularly.

The bonus computation is based upon the profitability of the business and the individual's performance during the year. The computation also takes into account conduct focus areas to enhance the link between conduct and remuneration. The Managing Director assesses the basis of the bonus computation on a regular basis in relation to all members of staff with the exception of himself, with the Chair of the Board setting the fixed remuneration and any bonus award for the Managing Director. No share equity schemes or supplementary pension schemes are in operation.

Material Transactions

There are no material transactions with shareholders; persons with significant influence on Red Sands nor members of the executive management body or the Board.

B.2 Fit and proper requirements

The Red Sands 'fit and proper' policy requires employees of Red Sands and members of the Boards to individually be fit and proper, having insight into the following where relevant (for the role);

- Insurance and financial markets;
- Strategy development and implementation;
- Corporate governance and risk management requirements;
- Financial, analytical and/or actuarial skills;
- Underwriting skills;

- Understanding of the regulatory framework and requirements.

The process for assessing the fitness and proprietary of each individual is carried out during the recruitment process and includes the following;

- ID verification (with photo ID);
- Candidate permitted to work in Gibraltar (where required);
- Qualifications Verified;
- Credit Check (as is appropriate);
- Criminal Convictions check (as appropriate);
- References checked with previous employer(s) (as deemed necessary).

Additionally, all Board and Committee members complete both a fitness and propriety self-assessment questionnaire and skills gap analysis on an annual basis or more frequently as may be required.

B.3 Risk management system including the own risk and solvency assessment

Risk Management System

Risk management is a collective responsibility of all individuals and remains the responsibility of the Board with certain authorities delegated to the Risk Committees and Senior Management. The Risk Management Function is managed on a day-to-day basis by the Risk Management Function Holder and the executive management team and the Committees have responsibility for providing oversight of current and potential risk exposures and the controls in place to mitigate risks, as evidenced in the preparation, review and maintenance of the Risk Register and Pillar II Governance Manual.

The view of the Risk Committees is that risk management is not limited to one function and as such the below is a table which maps areas of risk management to the relevant Red Sands operational functions responsible.

At all times ultimate oversight is the responsibility of the Boards.

Areas of Risk Management	Function to which the Board has delegated authority to manage the relevant risk
Underwriting, Claims, Complaints & Reserving Risk	Operations – Underwriting Committee
Investment Risk	Investment Committee
Liquidity & Concentration Risk	Executive Management Body (oversight by Investment Committee)
Operational Risk	Executive Management Body
Conduct Risk	Executive Management Body (oversight by Product Oversight and Governance Committee for RSE and the Underwriting Committee for RSL)

Asset-Liability Management Risk	Operations – Finance & Accounting (oversight by Investment Committee)
Reinsurance Risk	Operations – Underwriting Committee
Strategic & Reputational Risk	Executive Management Body
Cyber/ I.T. Risk	Executive Management Body
Overall Responsibility for Risk Management	Board of Directors

Own Risk and Solvency Assessment

Red Sands maintains a Risk Register and a register of stress and scenario tests that is updated and reviewed internally. The Register is reviewed in full by the Risk Committees at least annually and key risks are monitored on a regular basis by the Risk Committees and at least annually by the Boards.

When a new risk is raised or an existing risk changes materially, and the associated impact will affect either the solvency capital requirement or the available capital, a new Solvency Capital Requirement calculation is performed. New Solvency Capital Requirement calculations are also performed when key business decisions are being considered including appropriate stress testing as required. Key business decisions include significant changes to the investment portfolio and writing significant new product lines.

The outputs of the above analysis are captured in the Own Risk and Solvency Assessment ("ORSA") report. The ORSA process and report demonstrates and evidences the Boards' and their Committees' engagements in business planning, economic capital consideration and capital planning, risk management and risk appetite, stress testing, governance and the overall review of Red Sands Group's business. The ORSA process is an ongoing one, and stress tests in particular are undertaken throughout the year when circumstances require.

B.4 Internal control system

Red Sands Group has a Compliance Officer whose role is to monitor regulatory and non-regulatory compliance as set out in Red Sands policies and procedures.

It is noted that the Compliance Officer has direct access to the Audit Committee and to the Boards of Directors. For any issue, the Compliance Officer may approach the Chair directly and the Chair will then liaise with the rest of the members of the Board as deemed necessary.

The Compliance Officer is invited to attend all relevant committee meetings, regulatory and industry body meetings and liaises with outsourced functions.

The Compliance Function monitors Red Sands' compliance with applicable laws, regulations and administrative provisions, and reports to the Board.

B.5 Internal audit function

The Internal Audit of Red Sands is the third line of defence in the Risk Management System providing an objective and independent oversight of the system of governance. The responsibility and oversight of the internal audit function has been delegated by the Boards to the Audit Committee, having its own Terms of Reference as approved by the Boards. The membership and experience of the Audit Committee is considered in section B.1.

The Head of Internal Audit reports directly to the independent Chair of the Audit Committee to ensure independence and objectivity of the role. The Head of Internal Audit was also tasked with preparing the three-year Internal Audit Plan which was approved by the Audit Committee. The Audit Plan encompasses a risk-based approach to the assessment of the Key Risks and related internal controls of Red Sands Group and ensures that there is an appropriate frequency of independent assurance applied to the review of the control environments of any significant risks. The Head of Internal Audit is responsible for either carrying out the audits directly or co-sourcing internal audit activities with external independent consultants, and reporting any findings to the Audit Committee. The Head of Internal Audit may report directly to the Chair of the Audit Committee and the Chair of the Board of Directors if deemed necessary. After the completion of each audit, the findings, recommendations, and management's comments are reported by the Head of Internal Audit to the Audit Committee.

The Head of Internal Audit has complete autonomy and access to any resource within Red Sands Group to assist with any audit as required, which includes internal audits on the companies themselves, audits on the companies' distribution partners, and other outsourced service providers as required.

B.6 Actuarial function

The Actuarial Function is comprised of members of the Red Sands Underwriting Committees, finance function and experienced actuaries. The Actuarial Function co-ordinates the calculation of the technical provisions and reviews actual performance against forecast. Red Sands Group uses the services of an independent reviewing actuarial firm to review the calculation of the technical provisions on a regular basis and ensure that the technical provisions are calculated in accordance with best practice and the relevant regulations.

B.7 Outsourcing

The following key functions are outsourced:

- Actuarial
- Investment advisory
- Policy administration
- Claims handling

The outsourcing policy is set by the Boards who define the characteristics of organisations that we may not engage with. Service level agreements are maintained and annually reviewed with all outsourced function providers.

B.8 Any other information

The system of governance ensures the following;

- Compliance with all relevant regulation
- Compliance with all relevant corporate governance
- Compliance with risk tolerance levels set by the Board
- Compliance with capital adequacy requirements
- Compliance with all fit and proper requirements as set by the Board

Through the use of non-executive directors along with suitably resourced committees reporting directly to the Boards, Red Sands Group feels the system of governance is adequate for the size, nature and complexity of the businesses.

System of Governance

The governance and operations processes in place are common across Red Sands Group. Regarding material intra-group outsourcing arrangements, Red Sands Group share a common staff base employed by RSE.

The Gibraltar Financial Services Commission has given approval for the ORSA of Red Sands Group to be undertaken at the same time as RSE and RSL, and for a single ORSA report covering RSE, RSL and the Group to be produced. The Gibraltar Financial Services Commission has communicated its intent to cease regulating the Red Sands Group and instead regulate the wider group with effect from 1st January 2025, and therefore the single ORSA for 2024 considered RSE, RSL, the Red Sands Group and the wider group in preparation for this change.

C. Risk Profile

C.1 Underwriting risk

RSE is a diversified personal lines insurance company. The strategy of the insurer is to focus on niche high volume business lines that have generally low severity exposure profiles. RSE's underwriting risk profile can be summarised as:

- The significant majority of RSE's net premium is earned from policies of 12 months in term or less, with a focus on high volume, low value policies.
- Managed exposure to liability risk with low risk appetite. Liability risk is generally excluded from the policy as specified in the terms & conditions of the policy, or reinsured. In instances where exclusion is not possible and reinsurance is unviable, then the risk profile of liability exposures is carefully monitored and managed within the risk selection process.

RSL is in solvent run-off from June 2024 with no new business being written either directly or indirectly. On 7 January 2025, at the request of RSL, the GFSC issued a direction that RSL must not enter into new contracts of insurance business, including renewals, with immediate effect and gave notice that the RSL's Part 7 Permission had been varied to remove the regulated activity of effecting contracts of insurance.

Material risks

RSE's key underwriting risk is premium and reserve risk which comprises 60.0% of the undiversified underwriting risk charge. Premium and reserve risk arises from inappropriate underwriting (premium risk) and adverse claims development (reserve risk). The RSE Underwriting Committee is charged with the responsibility of managing and monitoring the technical performance of RSE. The underwriting risk charge has decreased as a result of the cessation of new AFI business and the 100% reinsurance to close agreement as referred to in section A.1.

RSL's key underwriting risks are lapse risk, expense risk and mortality risk which comprise 36.3%, 36.8% and 25.5% of the undiversified underwriting risk charge respectively. Lapse risk arises from a

higher than expected lapse rate on existing policies. Lapse risk is managed by the measurement and monitoring of lapse rates at least monthly, and by close working with our distribution partners. Expense risk is the risk that the costs associated with running the business of the company are higher than expected, including the expected total costs of the solvent run-off. Mortality risk arises from policyholders passing away before their expected lifespans, and RSL monitors mortality experience against expectation at least monthly. These risks generally offset each other, given that an increase in expenses will typically reduce future profitability and therefore reduce the lapse risk, and an increase in mortality risk will shorten the expected run off exposure. Both the RSL Underwriting Committee and the RSL Risk Committee share the responsibility of managing and monitoring the technical performance of RSL, alongside the finance function charged with managing the expense base of the Company against Board set budgets.

There have been no other material changes to the underwriting risks that RSE or RSL are exposed to over the reporting period.

Assessment measures

In both RSE and RSL, the measures used to monitor, assess and control the underwriting risks include:

- Using reinsurance to reduce exposure to high value claims.
- Monthly performance reporting highlights performance of key underwriting metrics.
- The ORSA includes stress and scenario testing which is used to assess the risks under stressed conditions.
- Experience investigations are conducted annually.

Risk mitigation techniques

The RSE reinsurance strategy is, where possible, to reinsure potential high value claims whilst retaining the high volume, low value business that comprises the majority of insurance written. As referred to in section A.1, RSE entered into a 100% reinsurance to close agreement effective 1 January 2025. Additionally, RSE entered into a 50% quota share arrangement from 1 January 2024 with respect of its remaining pet book.

In general, RSL's run-off business covers low value sums insured where traditional risk reinsurance is not required. However, RSL historically has made use of reinsurance capacity to provide capital support and to reduce its exposure to potentially higher value risks under products where it has less experience, and continues to manage these in solvent run off.

RSE and RSL do not make use of special purpose vehicles to mitigate or transfer risk.

Risk sensitivity

For both RSE and RSL, a number of different stress tests were conducted as part of the ORSA process to test the sensitivity to distributors ceasing to trade, material change in lapse and mortality rates, change in loss ratios, increase and decrease in new business growth rates, material change in mortality rates, decrease in renewal premiums, and a removal of the approval for Undertaking Specific Parameters ("USPs").

The latest ORSA highlighted the following material risks faced by Red Sands:

- Continued or new regulatory interventions, arising through the Consumer Duty or any other regulation, as a result of Red Sands Group failing to adequately evidence the operational oversight necessary under its operating model.
- A change in the regulatory interpretation of some elements of the Solvency II framework may result in a material increase in the solvency capital requirement.
- Removal of the approval for USPs in RSE would result in a material increase in the solvency capital requirement.
- RSE's solvency coverage is sensitive to unexpected changes in the loss ratio of the pet business.
- RSL's solvency coverage is sensitive to changes in the required expense provision.

C.2 Market risk

C.2.1 Material risks

RSE has exposure to the following risks which comprise the given % of the undiversified market risk charge: equity risk (25.9%) and concentration risk (36.4%). The material risk concentrations are a number of syndicated corporate bonds and strategic loans.

RSL's key market risk exposure is the equity risk (27.7% of the undiversified market risk charge).

C.2.2 Prudent Person Principle

The Investment Committees, being committees of the Boards, are charged with the responsibility of measuring, reporting on, monitoring of, control and managing the performance of all RSE's and RSL's investable assets. The Investment Committees have engaged the services of external experts to assist with this activity. The terms of reference of the respective Investment Committees detail Board imposed limits and controls on the quality, liquidity, asset class, nature, duration and security of investments and investment assets.

Although Red Sands Group has a broad range of investments, the Boards have a conservative approach with respect to the volatility in the returns – preferring lower, consistent returns over volatility in order to protect available assets. This prudent approach and the short tail nature of the underwriting exposures and investment portfolios also provides protection against current inflationary pressures.

In the context of the prudent person principle it is critical to look at each asset not in isolation, but together at the portfolio level. Each asset class is going to have favourable and unfavourable periods however, if the portfolios are constructed on a balanced and diversified basis across all the risk categories, with specific focus on managing correlations between asset classes, then drawdowns at the portfolio level are likely to be less severe in times of market stress.

Red Sands Group does not have any unit-linked policies where the investment risk is borne by the policyholders.

C.2.3 Assessment Measures

In both RSE and RSL, the measures used to monitor, assess and control the market risks include:

- A comprehensive set of performance indicators is assessed on a monthly basis and reviewed in detail at every Investment Committee meeting.
- Compliance with Board imposed limits and constraints such as asset class limits, liquidity constraints, and quality constraints is controlled by means of regular measurement and reporting.

C.2.4 Risk Mitigation Techniques

The techniques used to mitigate against market risk include:

- Material foreign currency exposures on the statutory account balance sheet are hedged back to the reporting currency.
- Maintaining a portfolio of diversified investments with respect to asset class, fund manager, historical volatility, counterparty but whilst maintaining a high level of liquidity and quality of assets.
- Material exposures to equity investments are held in a fund of collective investment undertakings that provides a downside protection guarantee.
- Any investment is subject to a rigorous due diligence process. This encompasses both investment due diligence, and operational due diligence. The investment due diligence includes evaluating the following aspects of the investment institution and investment fund: investment strategy, personnel, portfolio construction, risk management, instruments and a quantitative analysis. The operational due diligence includes evaluating the following aspects of the investment institution and investment fund: trade processes, financing, liquidity & cash controls, pricing policies, counterparties, review of financial statements, corporate organisational structure, capacity management and investor base, personnel organisational structure, legal & compliance, technology and business continuity.

C.2.5 Risk Sensitivity

For both RSE and RSL, a material stress test was conducted as part of the ORSA process to test the sensitivity of the investment portfolio to a stress equal to the equivalent of a 1 in 200-year shock, which may arise from a material drawdown in values, a material increase or decrease in interest rates, a material increase and decrease in foreign exchange rates, or any combination. The stress tests were combined in a number of wider scenario tests. For each stress tests or scenario tests that breached the solvency coverage, an appropriate recovery and resolution plan was detailed.

C.3 Credit risk

Material risks

Credit risk is the risk that a counterparty will be unable to pay amounts in full when due. Counterparty default risk in RSE forms 4.9% of the undiversified basic SCR, and, in RSL, it forms 4.0% of the undiversified basic SCR.

The material risk that Red Sands has relates to two banking counterparties as at 31 December 2024, both of which have credit quality steps of 2 or better and a reinsurance counterparty which has a credit quality step of 3.

In RSE, the net amount due from reinsurers is not material. In RSL, the net amount due from reinsurers is negative due to reinsurance being used to provide capital support (that is the net expected future cash flow from RSL to the reinsurer).

Prudent person principle

Counterparties are selected by taking the credit rating and reputation of each entity into account. Where appropriate, Red Sands uses multiple counterparties to avoid concentration risk. Red Sands does not rely on credit ratings alone when selecting an entity, but will also conduct appropriate due diligence.

Assessment measures

Assessment measures include quarterly review of the credit ratings of the counterparties, and the assessment of independent investment advisors on the future prospects of these counterparties.

Risk mitigation techniques

Risk mitigation techniques for credit risks include banking with more than one counterparty and performing due diligence on the counterparty before placing assets with them.

Risk sensitivity

A collective downgrade in the credit quality step of the two banking counterparties and the main reinsurance counterparty of RSE and RSL respectively would not result in the Board limit on solvency coverage being breached.

C.4 Liquidity risk

Material risks

Red Sands has limited liquidity risk. Furthermore, a significant cash and cash equivalents buffer is held above that expected to be required for near-term claims and operational purposes. The Investment Committee Terms of Reference requires 60% of investment assets to either be cash or short-term deposits directly with depositaries or other assets that may be liquidated within 30 days.

Prudent person principle

Liquidity is a key consideration when investing assets. This is reflected by a very high percentage of the assets being invested in highly liquid investments.

Assessment measures

Measures used to assess liquidity risk include a medium-term cash forecast that is updated weekly, and a long-term cash forecast that is updated for each Investment Committee meeting.

Risk mitigation techniques

A material percentage of assets are held as cash in bank accounts and as short-term, high quality assets in collective investment undertakings with daily liquidity. This is to ensure that there is sufficient cash available to meet short term requirements.

Risk sensitivity

Given that liquidity is not a material risk for Red Sands, no specific liquidity risk sensitivity is undertaken.

C.5 Operational risk

Material risks

The material operational risks that Red Sands faces and continues to manage include:

- Conduct – our people's and our partners behaviours and governance processes.
- Operational systems – the risk of failure of an operational system resulting in loss of availability, or temporary loss of data.
- Outsourcing – the risk of failure or non-performance of an outsourcing partner.
- People – the risk of failure of management practices and internal controls resulting in mis-management such as fraud.
- Cyber/I.T Risk – the risk of a major systems failure or cyber-attack either at Red Sands or an outsourcing partner resulting in corrupted or lost data theft and ransom costs.

Assessment measures

Measures used to assess operational risks include regular review of open risks and their associated risk mitigations by the Risk Committees, and regular audits of internal process and outsourced partners.

Risk mitigation techniques

Risk mitigation techniques employed are specific to each risk. The risk mitigation will seek to reduce, transfer, accept or eliminate the risk, and any residual risk is then signed off by the Risk Committee.

Sensitivity to operational risks has been stress tested by materially increasing the overheads of both RSE and RSL. After a material year on year increase in overheads the 3-year forecasted solvency coverage remains above the Board limits.

C.6 Other material risks

C.6.1 Brexit

As mentioned in section A.5, RSE and RSL have secured that policyholders are not adversely affected by Gibraltar's exit from the European Union. In the absence of EU Freedom of Services, RSE and RSL have a heightened level of regulatory/compliance risk in running off these exposures and continue to engage with the relevant regulatory authorities as required .

Other material risks

No other material risks are documented.

C.7 Any other information

Red Sands does not hold any off-balance sheet positions.

There are no significant risk concentrations at the level of Red Sands.

D. Valuation for Solvency Purposes

D.1 Assets

The valuation for solvency purposes of material asset classes is described below.

Corporate and Government Bonds

As at 31 December 2024, RSE had £24.0m invested in directly held corporate debt and £29.7m invested directly in UK issued government bonds ("gilts"). RSL had £8.3m invested in directly held corporate debt. RSL does not directly hold any government bonds.

The corporate debt and gilts are traded in active markets for similar assets as per Article 10(2) of the Delegated Act. The Delegated Act held effect in Gibraltar via the Withdrawl Act until the implementation of the Technical Standards in January 2025. Corporate debt is syndicated to unlisted entities led by a leading investment bank. There are no differences in the valuation of the assets for solvency purposes and those used for the valuation in financial statements. The methods and main assumptions in deriving their value for these separate purposes are the same. No changes have been made to the recognition and valuation bases during the reporting period.

Collective Investment Undertakings

As at 31 December 2024, RSE had £27.6m and RSL had £5.0m invested in collective investment undertakings.

All collective investment undertakings are traded in active markets for identical assets as per Article 10(2) of the Delegated Act. As these are actively traded securities, the market price represents fair value under Solvency II.

The value of all collective investment undertakings in the financial statements is the same as for Solvency II.

The methods and main assumptions in deriving their value for these separate purposes are the same. No changes have been made to the recognition and valuation bases during the reporting period.

Cash and Cash Equivalents

As at 31 December 2024, RSE had £93.7m and RSL had £19.0m in cash and cash equivalents.

Cash and cash equivalents are valued at face value in the reporting currency. Any currencies not in the reporting currency are valued at the spot exchange rate on the last day of trading of the reporting period. There are no differences in the valuation of the assets for solvency purposes and those used for the valuation in financial statements. The methods and main assumptions in deriving their value for these separate purposes are the same. No changes have been made to the recognition and valuation bases during the reporting period.

Reinsurance Recoverable

As at 31 December 2024, RSE's reinsurance recoverables totalled -£34.0m.

As at 31 December 2024, RSL had -£1.5m in reinsurance recoverables.

Reinsurance recoverables are valued in line with the terms and conditions of the associated re-insurance contract. The calculation of RSL's reinsurance recoverables assumes future management action to recapture generations of policies when permitted to do so and in line with past practice. The methods and main assumptions in deriving their value for these separate purposes are the same. No changes have been made to the recognition and valuation bases during the reporting period.

D.2 Technical provisions

D.2.1 RSE Technical Provisions

The value of best estimate and risk margin by line of business is given in the Appendix (IR.17.01.01 – 'Non-Life Technical Provisions' on page 45).

Best Estimate

Cash flow projection models have been designed for each homogenous risk group (by at least insurance product and contract term) which are then aggregated into the respective line of business above. These projection models are a best estimate of all future cash flows relating to the policy while it remains active over the life of the contract.

An Independent reviewing actuarial firm has reviewed the implemented projection models, based on a cash-flow approach, and advised that they are suitable for purpose and consistent with underlying valuation principles.

An example of one type of best estimate cash flow included in the projection models is the cost of future claims related to unearned business. It is calculated by applying expected loss ratios to unearned (at the valuation date) and future premium where the expected loss ratios have been derived based on a weighted average of normalised historical loss ratios.

The independent reviewing actuarial firm have also reviewed the main assumptions inherent in the chosen methodologies for reasonableness (such as ultimate loss ratios and payments patterns).

Risk Margin

The risk margin is calculated in accordance with the level 3 risk margin simplification as per the Delegated Act. Given the scale and the nature of the business written by RSE, the proportionality principle applies and using this simplification is considered reasonable.

The risk margin calculation is based on the guidelines 61 and 62 published by EIOPA in the document "Guidelines on the valuation of technical provisions". The independent reviewing actuarial firm have ensured that the calculation is in line with the regulatory requirements and that the risks included in the projected SCR are consistent with an amount that an insurance undertaking would require in order to take over the obligations.

Main assumptions

The risk-free interest rate term structure used for discounting the projected cash flows in the technical calculation is the relevant risk-free structure as specified by the Solvency II regulations.

The expenses incurred in servicing RSE's insurance obligations consist of administration, claims management/handling and overhead expenses. The Company performs a regular expense analysis. The best estimate expense assumptions are based on the results of this regular analysis together with budgeted expenses.

Lapse assumptions are set with reference to experience for RSE's business, guidance from subject matter experts, reinsurers and industry data.

Claims development and claim rate assumptions take account of credible internal experience.

Level of uncertainty associated with the value of technical provisions

RSE writes business with high-frequency, low-severity claims experience with only moderate volatility. The nature of this claims experience results in relatively low levels of uncertainty when projecting cash flows to make up the technical provisions. The above is evident when comparing the actual experience with previous estimates of the future claims experience. This is furthermore evidenced by RSE's USP approval for premium and reserve risk.

Uncertainty relates primarily to how future actual experience will differ from the best estimate assumptions used to calculate the technical provisions. The key assumptions are ultimate claims ratio, lapse rates and claims development factors. A robust assumption setting process is followed in order to ensure the uncertainty is well understood.

Valuation in Financial Statements (Miscellaneous Loss line of business)

The financial statement reserves relating to past claim events are seen as best estimate and are used as the base for the claims provision. The pet insurance products are an exception to the above with their explicit margin for prudence removed as well as further refinements to the method (a combination of chain-ladder and ultimate loss ratio) when compared to financial statement numbers.

Any financial statement items that would result in future cash flows (associated with intermediaries) are consolidated in the technical provisions. These include premium debtors, claim funds and profit shares. However, cash flows such as future premium on monthly paid business are also included in the technical provision but do not necessarily appear in the financial statements.

The technical provisions also estimates the most likely future cash flows (claims, expenses etc) from the unexpired contract term whereas the financial accounts have a more traditional reserve represented simply by the Unearned Premium Reserve ("UPR").

Valuation in Financial Statements (Credit & Suretyship line of business)

Financial statement reserves relating to past claim events are seen as best estimate and used as the base for claims provision. Any financial statement items that would result in future cash flows (associated with intermediaries) are consolidated in the technical provisions. These include premium debtors, claim funds and profit shares.

The technical provisions also estimate the most likely future cash flows (claims, expenses etc) from the unexpired contract term whereas the financial accounts have a more traditional reserve represented simply by the UPR.

Other Adjustments and Assumptions

The matching adjustment referred to in Article 68 of the Solvency II Directive has not been applied.

The volatility adjustment referred to in Article 70 of the Solvency II Directive has not been used.

The transitional risk-free interest rate-term structure referred to section 2 of Schedule 1 of the Solvency II Directive has not been applied.

The transitional deduction referred to in section 2 of Schedule 1 of the Solvency II Directive has not been applied.

There are no material changes in the relevant assumptions made in the calculation of technical provisions compared to the previous reporting period.

D.2.2 RSL Technical Provisions

RSL's primary line of business has historically been that of life insurance, including stand alone and complementary accident and sickness policies, although RSL entered solvent run off in June 2024. The accident and sickness policies are treated as similar to life products for the purposes of the technical provisions and therefore the life and the accident and sickness policies are considered together. The value of best estimate and risk margin is given in the Appendix (IR.12.01.01 – 'Life Technical Provisions' on page 58).

Best Estimate Key Assumptions

The key assumptions underlying the calculation of the RSL's technical provisions are as follows:

1. Policy and premium persistency

   The policy persistency rates are expressed as monthly lapse rates and reflect the likelihood of a policy no longer being "on risk" for RSL due to lapsation, i.e. RSL is no longer liable to pay out any claims on the policies. Premium persistency assumptions reflect the likelihood of active policies paying their premiums.

   The above assumptions are derived based on analysis of actual experience and are revised annually where necessary.

2. Mortality

   The mortality assumptions are split by broad product group as follows:

   - Non-underwritten Whole of Life & Term Life Products
     The base mortality table used is population mortality from a specific year, either from the relevant local national statistics database and other publicly available sources, or from Eurostat (where the local national statistics database does not provide mortality tables). These tables are reshaped based on current realistic estimates of expected mortality levels reflecting policy duration, policyholder age and gender.

   - Simplified underwriting Whole of Life & Term Life Products

The base mortality tables used are the reinsurer risk rates provided for the relevant product lines (with no additional loadings). Where the product is not currently reinsured, quoted reinsurer risk rates are used.

- Non-underwritten Accidental Death Products
  Similar mortality assumptions to Whole of Life products are adopted in the projection of policyholders remaining in-force (as not all deaths under this product would result in a claim). Given that the customer base of the Accidental Death product is relatively similar to that of the Whole of Life products it is not unreasonable to assume that general mortality will be similar to that of Whole of Life policyholders.

The above assumptions are derived based on analysis of actual experience and are revised annually where necessary.

3. Morbidity

This assumption reflects the likelihood of claims on the accidental disability and hospital cash products:

- Non-Underwritten Accidental Disability Products

  The basis of this assumption is based on population statistics from Eurostats by cause of the accident and by country. The population statistics are adjusted to reflect the actual experience as more information becomes available as the book matures.

  As claims are only paid for accidental disability, it is difficult for policyholders to select against RSL, therefore it is reasonable to assume that experience will be in line with that of the general population.

- Non-Underwritten Hospital Cash Plan
  Incidences of hospitalisation and average number of days in hospital are based on Eurostat population statistics, adjusted for observed experience where sufficient data is available.

The above assumptions are derived based on analysis of actual experience and are revised annually where necessary.

4. Expenses & Commission

RSL outsources the servicing of run off business and this is reflected with the expense assumptions. The expense assumptions in relation to RSL's reinsurance business reflects the Company's share of the primary insurer's expense assumptions. Expenses can be split into:

- Policy administration - a fixed amount per policy set out in the Service Level Agreements between RSL and its distributors.
- Claims administration - a fixed amount per claim set out in the Service Level Agreements between RSL and its distributors.

- Overhead expenses (including investment expenses) - assumed to be a fixed percentage of premium. Overhead expenses are monitored at least annually to ensure these are in line with expectations.

The expense inflation rate is country-specific and is set to reflect the target inflation rate as determined by the monetary policy in each country.

Given that RSL is in solvent run off, the commissions relate to ongoing commission, being a set percentage of a month's worth of premiums set out in Service Level Agreements between RSL and its main distributors, where this is relevant.

The commission clawback period is specified in the Service Level Agreements between RSL and its main distributors.

A global expense reserve has been established given RSL is in run-off to provide for a minimum level of overhead expense to support the business over a projected period of fifty years.

5. Interest rates

The risk-free interest rate term structures used within the model are those published be EIOPA at the valuation date for each relevant currencies.

The relevant risk-free interest rate term structures are:

- Polish Zloty
- Hungarian Forint
- Czech Koruna
- Euro (for Slovakia and Greece)
- United Kingdom Sterling – for the calculation of the risk margin.

6. Exchange rates

For the 31 December 2024 calculation of the technical provisions, cashflows are converted to GBP using the same year-end exchange rates used for the management accounts, which is the spot exchange rate on the last day of trading of the reporting period.

The above assumptions have been reviewed by an independent reviewing actuarial firm who have confirmed that they are satisfied that the assumptions used within the calculation of the technical provisions are appropriate taking into account the quality and credibility of the latest available data and that the assumptions are sufficient and appropriate to the business being modelled.

Best Estimate Methodology

The appropriateness of the methods and models used for the calculation of the technical provisions was assessed during the development phase prior to the implementation of Solvency II with reference to the main risk drivers and the line of business of RSL. The cashflow projections use standard recognised actuarial techniques, and relevant product features have been allowed for, taking into account the materiality of each feature and product line, and availability of data.

The calculation of the technical provisions has been carried out consistently with the requirements set out in the Solvency II Directive. No unusual or non-standard methods have been used in the

calculation of RSL's technical provisions. Additionally, no approximate methods are used in the calculation of the technical provisions in response to the lack of availability of sufficient data of appropriate quality.

The methodologies used have been reviewed by an independent reviewing actuarial firm, who have confirmed that they consider the methods and models used in the calculation of the technical provisions to be consistent with the cashflows that are used to determine a best estimate of the liabilities arising from business sold by RSL and the requirements of Solvency II.

A description of the methodologies used in calculating each component of the technical provisions are noted below.

- Best estimate – Main Benefit
  Cashflow projections are carried out via actuarial software Prophet, using standard actuarial techniques. These models reflect the key features of each product, including the key assumptions noted above.

  The best estimate is calculated using realistic assumptions and industry accepted actuarial methods for the projection of future cashflows, discounted at the relevant risk-free interest rate term structure provided by EIOPA as at the valuation date. The present values of net future cashflows (i.e. allowing for both expected income and outgo) are output grouped by product and country, in the local currency. These amounts are converted to GBP using the same month end exchange rates as used for management accounts as at the valuation date.

  Outstanding claims amounts (i.e. pending claim settlements), any premium debtors and any incurred but not reported claims reserve (IBNR) as of the valuation date are added to the initial best estimate. These amounts are usually small relative to the size of the initial best estimate.

- Best estimate – Riders
  Cashflows associated with riders attaching to the main benefit are calculated in a similar manner to above and include: Double/Triple/Quadruple Accidental Death (DAD/TAD/QAD), Funeral Comforter, Parent Cover, Premium Waiver, Permanent Disability Rider and Cancer Rider.

Risk Margin

The risk margin is calculated separately, using Method 1 detailed in the Solvency II Guidelines (Approximate individual risks/sub-risks within some or all modules/sub-modules) for projecting future Solvency Capital Requirements. This method projects each relevant component part of the SCR calculation when assuming existing business is in run off. The main components projected are:

- Life underwriting risk module.
- Health underwriting risk module.
- Default risk module (assuming all assets are held as cash at bank and current reinsurance arrangements continue but no new reinsurance is taken out).

- Market risk module (needs to be minimised therefore assuming all assets are held as cash means that the only relevant risk that needs to be projected is the currency risk component).
- Operational risk module (standard formula based on projected premiums).

Options & Guarantees

There are no complicated or unusual options and guarantees on any of RSL products.

Level of uncertainty associated with the value of technical provisions

As with all projections, there is uncertainty within the selected best estimates where judgements need to be made. The areas of uncertainty/judgment for each of the key assumptions are detailed below.

1. Persistency

The main uncertainties associated with the persistency assumptions are the shape of the policy persistency and long-term premium persistency rates.

2. Mortality

Non-underwritten Whole of Life & Term Life Products

The main uncertainties associated with this assumption are the level of insured mortality relative to population mortality during the initial "selection" period.

Simplified underwriting Whole of Life & Term Life Products

The main uncertainty associated with this assumption is whether the reinsurer risk rates are a true reflection of the actual mortality of the specific insured portfolio.

Non-underwritten Accidental Death Products

The uncertainties associated with this assumption are the shape of the insured accidental mortality by age may differ from that of the general population.

The Actuarial Function has performed sensitivity tests over the course of the year in order to quantitatively analyse the sensitivity of RSL's Technical Provisions to these best estimate assumptions.

Valuation in Financial Statements

The method adopted for the valuation is a gross premium valuation method which explicitly allows for the expected future cash-flows arising from the policies in-force at the valuation date. Policies are valued on an individual basis and are not grouped. Any rider benefits are valued as part of the host policy and not on a standalone basis. Furthermore, as per regulation 30 referred to above, no policy is treated as an asset and negative reserves are eliminated at the policy level.

Other Adjustments and Assumptions

The matching adjustment referred to in Article 68 of the Solvency II Directive has not been applied.

The volatility adjustment referred to in Article 70 of the Solvency II Directive has not been used.

The transitional risk-free interest rate-term structure referred to in section 2 of Schedule 1 of the Solvency II Directive has not been applied.

The transitional deduction referred to in section 3 of Schedule 1 of the Solvency II Directive has not been applied.

There are no other material changes in the relevant assumptions made in the calculation of technical provisions compared to the previous reporting period.

D.3 Other liabilities

The valuation for solvency purposes of material liability classes is described below.

Net Deferred Tax Liability

In both RSE and RSL, the net deferred tax liability is calculated as the net of the deferred tax liability and the deferred tax asset.

The deferred tax asset is calculated as the applicable tax rate multiplied by the difference between the sum of "technical liabilities", "reinsurance payables", and "any other liabilities" on the Solvency 2 balance sheet and the GAAP balance sheet.

The deferred tax liability is calculated as the applicable tax rate multiplied by the difference between the sum of "reinsurance assets", "insurance, loans & other receivables", and "any other assets" on the Solvency II balance sheet and the GAAP balance sheet.

No net deferred tax liability or asset is included on the GAAP balance sheet. No changes have been made to the recognition and valuation bases during the reporting period.

Reinsurance Payables

In both RSE and RSL, reinsurance payables are valued in line with the terms and conditions of the associated re-insurance contract. There are no differences in the valuation of the liability for solvency purposes and those used for the valuation in financial statements. The methods and main assumptions in deriving their value for these separate purposes are the same. No changes have been made to the recognition and valuation bases during the reporting period.

Any Other Liabilities

The material liabilities included under any other liabilities are Insurance Premium Tax payable, income tax payable, accruals, and creditors arising from insurance operations. There are no differences in the valuation of the liability for solvency purposes and those used for the valuation in financial statements. The methods and main assumptions in deriving their value for these separate purposes are the same. No changes have been made to the recognition and valuation bases during the reporting period.

Subordinated Liability

The Subordinated Liabilities item in RSE is comprised of the subordinated debt issued by RSE in October 2015. The subscriber of the debt is a specialist fund that invests in the illiquid subordinated

debt of European small to mid-cap insurers. This debt qualifies as Tier 2 capital from a Solvency II capital perspective.

Other

No Red Sands liabilities are subject to financial or operating leases.

There are no liabilities associated with material employee benefits.

D.4 Alternative methods for valuation

An alternative valuation method has been applied to the subordinated debt in RSE. There is a limited traded market for the long dated subordinated debt of small European insurers. As a result, it is not possible to apply the valuation methodology in Article 10(2). Rather the alternative valuation approach Article 10(7b) is applied, which employs a discounted cash-flow approach. The discount factor that is currently applied remains Euribor plus spread at issuance. This methodology has been reviewed by an independent reviewing actuarial firm as well as an independent audit firm who have confirmed that they are satisfied with the methodology applied

D.5 Any other information

D.5.1 Group Valuation for Solvency Purposes

The bases, methods and assumptions used at Red Sands for the valuation for solvency purposes of the Group's assets, technical provisions and other liabilities are no different from those used by any of its subsidiaries for the valuation for solvency purposes of its assets, technical provisions and other liabilities.

E. Capital Management

E.1 Own funds

Objective & Process

Both RSE and RSL have Board stated objectives to maintain own funds at a certain level in excess of the Solvency Capital Requirement to match the Boards' risk appetites.

The relevant Red Sands Board will recommend any dividends for approval by the shareholder and dividends will not be approved or paid if this results in the forecasted solvency coverage breaching the relevant Board's risk appetite over the planning horizon of three years.

Any additional own funds raised by issuing of shares or raising of debt requires approval of the relevant Red Sands Board and prior authorisation from the Gibraltar Financial Services Commission, unless they comply with Articles 69, 72 or 76 of the Commission Delegated Regulation (EU) 2015/35.

Own Funds

RSE and RSL both have only one class of share, namely Tier 1 ordinary shares. No new shares have been issued by either company over the reporting period.

RSE has €20m of sub-ordinated Tier 2 debt. The debt is classified as Tier 2 and is sub-ordinated to the ordinary shares. The maturity of the debt is January 2026. The debt was issued in Euros.

All own capital in excess of the ordinary shares and associated share premium account are accounted for in the reconciliation reserve.

Material Changes

In RSE, the material change over the reporting period is an increase in own funds of £39.1m. Of this change, £39.9m is due to increases in retained earnings (net of dividends paid). Valuation changes on the subordinated debt have contributed negatively by £0.7m.

In RSL, the material change over the reporting period is a decrease in own funds of £11.2m (net of dividends paid). The main driver of this change is the payment of a dividend of £12m.

The material differences between equity as shown in the undertaking's financial statements and the excess of assets over liabilities as calculated for solvency purposes are:

- The difference in basis for the calculation of the best estimate liabilities and reinsurance recoverable in RSL between the financial statements and Solvency II.
- The exclusion of margin from the Solvency II best estimates.

Capital Requirement

The eligible amount of own funds to cover the Solvency Capital Requirement and Minimum Capital Requirement, classified by tiers, is provided in the Appendix (IR.23.01.01 – 'Own Funds' on pages 47 and 48 for RSE; and IR.23.01.01 – 'Own Funds' on pages 59 and 60 for RSL). The same quantitative reporting templates also provide the solvency ratios, calculated as eligible own funds as a percentage of the Solvency Capital Requirement.

Other

No basic own-fund items are subject to transitional arrangements.

There exist no options or warrants on the own funds.

There are no ancillary own funds.

There are no significant restrictions affecting the availability and transferability of own funds within Red Sands.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

The Solvency Capital Requirement at the end of the reporting period, split by risk module, is provided in the Appendix (IR.25.04.01.01 – 'Solvency Capital Requirement' on page 49 for RSE; and IR.25.04.01.01 – 'Solvency Capital Requirement' on pages 56 and 57 for RSL).

The Minimum Capital Requirement at the end of the reporting period is provided in the Appendix (IR.28.01.01.01 – 'Minimum Capital Requirement - Only life or only non-life activity' on page 50 for RSE; and IR.28.01.01.01 – 'Minimum Capital Requirement – Only life or only non-life activity' on page 61 for RSL).

The standard model, adjusted via the use of USPs in respect of RSE, is used to calculate the Capital Requirement.

Loss absorbing capacity of deferred taxes

RSE recognises a deferred tax liability of £2.1m as at 31 December 2024 and RSL recognises a deferred tax liability of £nil as at 31 December 2024. The Group recognises a deferred tax liability of £2.1m. Deferred tax assets and deferred tax liabilities are calculated based on the future taxable profits recognised within available capital, taken at the prevailing tax rates at the balance sheet date.

The loss absorbing capacity of deferred tax has been assessed and a reduction taken in the solvency capital requirement of RSE of £2.1m and of RSL of £0.5m.

Simplified Calculations

No simplified calculations are used.

Undertaking Specific Parameters ("USPs")

In RSE, USPs are used in the calculation of Premium and Reserve Risk for the Miscellaneous Financial Loss segment. It is believed that the calibration of the "Miscellaneous Financial Loss" in the standard formula does not reflect RSE's insurance risk profile.

"Miscellaneous Financial Loss" is a generic category for insurance that is not covered by more specific categories. It includes insurance obligations which cover employment risk, insufficiency of income, bad weather, loss of benefit, continuing general expenses, unforeseen trading expenses, loss of market value, loss of rent or revenue, indirect trading losses, other financial loss (non-trading) as well as any other risk of non-life insurance not covered by the specific lines of business. Given the wide range of insurance obligations covered by the "Miscellaneous Financial Loss" category, it

is by nature generic and hence not representative of any of the heterogeneous insurance obligations which get allocated in this category.

For the above reasons, it is RSE's view that the standard formula parameter calibration used for "Miscellaneous Financial Loss" for both premium and reserve risk does not properly reflect the risk profile of RSE and so RSE should continue the use of Undertaking-Specific Parameters for its insurance portfolios (aggregated within "Miscellaneous Financial Loss") to allow RSE to more closely match capital requirements to its risk profile. The use of USPs has been approved by the GFSC and an annual report which is shared with the Board is prepared by the Actuarial Function detailing updates to the USP application. An independent reviewing actuarial firm also performs an annual review of the USP calculations undertaken by the Actuarial Function.

Material Changes

In RSE, the Solvency Capital Requirement has increased by £3.5m over the reporting period, mainly due to a decrease in the loss absorbing capacity of deferred tax.

In RSL, the Solvency Capital Requirement decreased by £0.8m over the reporting period.

The Minimum Capital Requirement of both RSE and RSL has moved in line with the Solvency Capital Requirements of each trading entity.

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

Red Sands has not used the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement.

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

Red Sands has not used any internal model in the calculation of the Solvency Capital Requirement.

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

Red Sands's own capital is and has been compliant with the Minimum Capital Requirement and Solvency Capital Requirement throughout the reporting period.

E.6 Any other information

E.6.1 Red Sands Capital Management

Method 1 (Accounting consolidation-based method) of the Solvency II Directive has been used to calculate the Group's solvency.

The subordinated debt own fund item in RSE is not transferrable to another entity within the group. The subordinated debt own fund item is included in the calculation of the group solvency up to the contribution of RSE to the Group's SCR in accordance with Article 330(5) of the Delegated Act.

The Group Solvency Capital Requirement is provided in the Appendix (IR.25.04.04.01 – 'Solvency Capital Requirement' on pages 74-75).

The material source of group diversification effects is due to the life and health underwriting risk modules having a correlation coefficient of 0 with the non-life underwriting risk module. This contributes approximately 49% of the Group's basic Solvency Capital Requirement diversification benefit.

E.6.2 Utilisation of Article 116(4)

Article 116(4) refers to Article 116, paragraph 4 of the European Union Commission Delegated Regulation 2015/35, which takes effect in Gibraltar through the European Union (Withdrawal) Act 2019.

The Board of RSE notified the Gibraltar Financial Services Commission in December 2024 of its intention to utilise the provisions of Article 116(4) in the solvency assessment as at 31 December 2024 and for the quarterly submissions through calendar year 2025. The use of Article 116(4) permits RSE to consider only the forward looking projected premium volume measures in assessing the premium reserve risk element of the underwriting risk, subject to complying with certain conditions. The Board considered this appropriate as a result of the significant decrease in projected premium volumes in 2025 as a result of ceasing to underwrite new AFI business and as a result of entering into the related 100% reinsurance to close, as disclosed in section A.1. The impact of utilising Article 116(4) is to reduce the premium reserve risk component of the underwriting risk charge of the SCR.

Appendix – Quantitative Reporting Templates

The following pages contain the public quantitative reporting templates (QRTs) of:

- Red Sands Insurance Company (Europe) Limited (Solo QRTs) - Pages 38 to 50
- Red Sands Life Assurance Company (Europe) Limited (Solo QRTs) - Pages 51 to 61
- Red Sands Group Holdings Limited (Group QRTs) - Pages 62 to 75

IR.02.01.01.01
Balance sheet

All monetary amounts presented in £'000

		Solvency II value
Assets		**C0010**
Intangible assets	**R0030**	0
Deferred tax assets	**R0040**	0
Pension benefit surplus	**R0050**	0
Property, plant & equipment held for own use	**R0060**	1,221
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	135,681
Property (other than for own use)	**R0080**	0
Holdings in related undertakings, including participations	**R0090**	0
Equities	**R0100**	693
Equities - listed	**R0110**	0
Equities - unlisted	**R0120**	693
Bonds	**R0130**	27,403
Government Bonds	**R0140**	21,739
Corporate Bonds	**R0150**	5,663
Structured notes	**R0160**	0
Collateralised securities	**R0170**	0
Collective Investments Undertakings	**R0180**	107,555
Derivatives	**R0190**	30
Deposits other than cash equivalents	**R0200**	0
Other investments	**R0210**	0
Assets held for index-linked and unit-linked contracts	**R0220**	0
Loans and mortgages	**R0230**	11,362
Loans on policies	**R0240**	0
Loans and mortgages to individuals	**R0250**	0
Other loans and mortgages	**R0260**	11,362
Reinsurance recoverables from:	**R0270**	(33,964)
Non-life and health similar to non-life	**R0280**	(33,964)
Life and health similar to life, excluding index-linked and unit-linked	**R0315**	0
Life index-linked and unit-linked	**R0340**	0
Deposits to cedants	**R0350**	0
Insurance and intermediaries receivables	**R0360**	7,679
Reinsurance receivables	**R0370**	10,075
Receivables (trade, not insurance)	**R0380**	(444)
Own shares (held directly)	**R0390**	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	**R0400**	0
Cash and cash equivalents	**R0410**	44,431
Any other assets, not elsewhere shown	**R0420**	0
Total assets	**R0500**	**176,040**

IR.02.01.01.01
Balance sheet

All monetary amounts presented in £'000

		Solvency II value
Liabilities		**C0010**
Technical provisions - total	**R0505**	30,107
Technical provisions – non-life	**R0510**	30,107
Technical provisions - life	**R0515**	0
Best estimate - total	**R0542**	27,356
Best estimate - non-life	**R0544**	27,356
Best estimate - life	**R0546**	0
Risk margin - total	**R0552**	2,751
Risk margin - non-life	**R0554**	2,751
Risk margin - life	**R0556**	0
Transitional (TMTP) - life	**R0565**	0
Other technical provisions	**R0730**	0
Contingent liabilities	**R0740**	0
Provisions other than technical provisions	**R0750**	0
Pension benefit obligations	**R0760**	0
Deposits from reinsurers	**R0770**	0
Deferred tax liabilities	**R0780**	2,085
Derivatives	**R0790**	42
Debts owed to credit institutions	**R0800**	0
Financial liabilities other than debts owed to credit institutions	**R0810**	0
Insurance & intermediaries payables	**R0820**	0
Reinsurance payables	**R0830**	0
Payables (trade, not insurance)	**R0840**	19,378
Subordinated liabilities	**R0850**	16,536
Subordinated liabilities not in Basic Own Funds	**R0860**	0
Subordinated liabilities in Basic Own Funds	**R0870**	16,536
Any other liabilities, not elsewhere shown	**R0880**	0
Total liabilities	**R0900**	**68,147**
Excess of assets over liabilities	**R1000**	**107,893**

IR.05.02.01.01

All monetary amounts presented in £'000

Premiums, claims and expenses by country

		Home country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total top 5 countries and home country
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	R0010		GB	IE	PL			
		C0080	C0090	C0100	C0110	C0120	C0150	C0140
Premiums written								
Gross - Direct Business	R0110	0	401,125	0	0			401,125
Gross - Proportional reinsurance accepted	R0120	0	0	0	0			0
Gross - Non-proportional reinsurance accepted	R0130	0	0	0	0			0
Reinsurers' share	R0140	0	21,897	0	0			21,897
Net	R0200	0	379,228	0	0			379,228
Premiums earned								
Gross - Direct Business	R0210	0	398,824	8	0			398,833
Gross - Proportional reinsurance accepted	R0220	0	0	0	0			0
Gross - Non-proportional reinsurance accepted	R0230	0	0	0	0			0
Reinsurers' share	R0240	0	21,897	0	0			21,897
Net	R0300	0	376,927	8	0			376,936
Claims incurred								
Gross - Direct Business	R0310	0	225,731	(3)	0			225,728
Gross - Proportional reinsurance accepted	R0320	0	0	0	0			0
Gross - Non-proportional reinsurance accepted	R0330	0	0	0	0			0
Reinsurers' share	R0340	0	12,644	0	0			12,644
Net	R0400	0	213,087	(3)	0			213,083
Net expenses incurred	R0550	(892)	123,144	0	0			122,252

Non-life income, expenditure and business model analysis: reporting period

IR.05.04.01.01

		All business (including annuities stemming from accepted non-life insurance and reinsurance contracts)								Personal lines - motor	Personal lines - household
			All non-life business (ie excluding annuities stemming from accepted insurance and reinsurance contracts)							Underwriting not outsourced or delegated	Underwriting not outsourced or delegated
				Line of Business for: non-life insurance and accepted proportional reinsurance obligations							
				Medical expense insurance	Motor vehicle other motor insurance - personal lines	Fire and other damage to property insurance - personal lines	Credit and suretyship insurance	Assistance	Miscellaneous financial loss	Broker / intermediary	Broker / intermediary
		C0010	C0015	C0110	C0150	C0170	C0230	C0250	C0260	C0630	C0680
Income											
Premiums written											
Gross written premiums	R0110		401,125	15,320	2,504	23,919	2,556	15,320	341,505	2,504	23,919
Gross written premiums - insurance (direct)	R0111		401,125	15,320	2,504	23,919	2,556	15,320	341,505	2,504	23,919
Gross written premiums - insurance (direct) - new business	R0112		35,230	11,478	0	23,752	0	0	0	0	23,752
Gross written premiums - accepted reinsurance	R0113		0	0	0	0	0	0	0	0	0
Gross written premiums - contracts of duration 12 months or less	R0120		395,901	15,320	0	23,919	-163	15,320	341,505		
Gross written premiums - contracts of duration more than 12 months	R0130		5,224	0	2,504	0	2,719	0	0		
Gross written premiums - relating to contracts incepting prior to the period	R0140		174,408	49	2,504	168	2,523	49	169,115		
Net written premiums	R0160		379,228	15,057	2,504	21,932	2,555	15,057	322,122		
Premiums earned and provision for unearned											
Gross earned premiums	R0210		398,833	14,482	11,480	21,290	2,480	14,482	334,618	11,480	21,290
Gross provision for unearned premium	R0211		49,837	3,449	5,592	13,099	4,728	3,449	19,520		
Gross provision for unearned premium - FSCS	R0212		11	4	-45	13	0	4	34		
Net earned premiums	R0220		376,936	14,220	11,480	19,303	2,479	14,220	315,235		
Net earned premiums from business transfers-in	R0410	0	0	0	0	0	0	0	0		
Investments and other income											
Investment income	R0420	6,040									
Realised and unrealised gains / (losses)	R0430	2,925									
Investment income and investment gains / (losses)	R0435	8,965									
Other income	R0440	7									
Total income	R0510	385,908									

Non-life income, expenditure and business model analysis: reporting period

IR.05.04.01.01

			All business (including annuities stemming from accepted non-life insurance and reinsurance contracts)							Personal lines - motor	Personal lines - household
			All non-life business (ie excluding annuities stemming from accepted insurance and reinsurance contracts)							Underwriting not outsourced or delegated	Underwriting not outsourced or delegated
				Line of Business for: non-life insurance and accepted proportional reinsurance obligations							
				Medical expense insurance	Motor vehicle other motor insurance - personal lines	Fire and other damage to property insurance - personal lines	Credit and suretyship insurance	Assistance	Miscellaneous financial loss	Broker / intermediary	Broker / intermediary
		C0010	C0015	C0110	C0150	C0170	C0230	C0250	C0260	C0630	C0680
Expenditure											
Claims incurred											
Gross (undiscounted) claims incurred	R0610		224,147	5,279	7,987	11,584	-148	5,279	194,166	7,987	11,584
Gross (undiscounted) claims incurred - insurance (direct)	R0611		224,147	5,279	7,987	11,584	-148	5,279	194,166		
Gross (undiscounted) claims incurred - accepted reinsurance	R0612		0	0	0	0	0	0	0		
Gross claims paid during the period	R0620	225,926	225,926	3,974	8,033	11,579	1,249	3,974	197,116		
Gross (undiscounted) claims provision at end of the period - insurance (direct)	R0630		40,888	3,122	599	7,477	506	3,122	26,062		
Gross (undiscounted) claims provision at end of the period - accepted reinsurance	R0631		0	0	0	0	0	0	0		
Gross (undiscounted) claims provision at end of the period - FSCS	R0635		0	0	0	0	0	0	0		
Gross (undiscounted) claims provision at start of the period	R0640		42,667	1,817	584	7,472	1,903	1,817	29,074		
Gross (undiscounted) claims incurred - claim events that occurred prior to the period	R0650		-7,871	1,066	20	871	-1,095	1,052	-9,785		
Gross claims paid during the period - claim events that occurred prior to the period	R0660		28,821	1,066	604	6,273	808	1,053	19,017		
Gross (undiscounted) claims provision at end of the period - claim events that occurred prior to the period	R0680		5,975	1,817	0	2,070	0	1,817	272		

Non-life income, expenditure and business model analysis: reporting period

IR.05.04.01.01

		All business (including annuities stemming from accepted non-life insurance and reinsurance contracts)								Personal lines - motor	Personal lines - household
			All non-life business (ie excluding annuities stemming from accepted insurance and reinsurance contracts)							Underwriting not outsourced or delegated	Underwriting not outsourced or delegated
				Line of Business for: non-life insurance and accepted proportional reinsurance obligations							
				Medical expense insurance	Motor vehicle other motor insurance - personal lines	Fire and other damage to property insurance - personal lines	Credit and suretyship insurance	Assistance	Miscellaneous financial loss	Broker / intermediary	Broker / intermediary
		C0010	C0015	C0110	C0150	C0170	C0230	C0250	C0260	C0630	C0680
Net (undiscounted) claims incurred	R0690		211,503	5,168	7,987	11,145	-148	5,168	182,183	0	0
Net claims paid during the period	R0700	214,872	214,872	3,974	8,033	11,462	1,249	3,974	186,179	0	0
Net (undiscounted) claims provision at end of the period	R0710		37,429	3,011	599	6,160	506	3,011	24,142	0	0
Net (undiscounted) claims provision at start of the period	R0720		40,799	1,817	584	6,478	1,903	1,817	28,199	0	0
Net (undiscounted) claims incurred - claim events that occurred prior to the period	R0724		-8,496	1,066	20	358	-1,095	1,066	-9,910	0	0
Net claims paid during the period - claim events that occurred prior to the period	R0725		26,596	1,066	604	4,766	808	1,066	18,286	0	0
Net (undiscounted) provision at end of the period - claim events that occurred prior to the period	R0726		5,707	1,817	0	2,070	0	1,817	3	0	0
Net (discounted) claims incurred	R0730	211,503	211,503	0	0	0	0	0	0	0	0
Analysis of expenses incurred											
Technical expenses incurred net of reinsurance ceded	R0910	119,103	0	0	0	0	0	0	0		
Administrative expenses	R0920	3	0	0	0	0	0	0	0		
Investment management expenses	R0930	286	0	0	0	0	0	0	0		
Acquisition costs - commission	R0950	112,295	112,295	7,884	443	5,551	809	7,884	89,724	443.26	5,551.42
Acquisition costs - other	R0960	-2,536	-2,536	-378	1,454	-1,017	-278	-378	-1,939		
Reinsurance commissions and profit participations	R0970	1,925	1,925	0	-121	0	-140	0	2,186		
Overhead expenses	R0980	10,980	0	0	0	0	0	0	0		
Acquisition costs, commissions, claims management costs	R0985	107,834	107,834	7,506	2,018	4,535	670	7,506	85,599		
Other expenditure											
Changes in additional provisions for unexpired risks	R1000	2,512	0	0	0	0	0	0	0		
Interest paid or payable	R1120	1,812	0	0	0	0	0	0	0		
Taxation	R1130	6,028	0	0	0	0	0	0	0		
Total expenditure	R1310	340,958	0	0	0	0	0	0	0		

Non-life income, expenditure and business model analysis: reporting period

IR.05.04.01.01

		All business (including annuities stemming from accepted non-life insurance and reinsurance contracts)								Personal lines - motor	Personal lines - household
			All non-life business (ie excluding annuities stemming from accepted insurance and reinsurance contracts)							Underwriting not outsourced or delegated	Underwriting not outsourced or delegated
				Line of Business for: non-life insurance and accepted proportional reinsurance obligations							
				Medical expense insurance	Motor vehicle other motor insurance - personal lines	Fire and other damage to property insurance - personal lines	Credit and suretyship insurance	Assistance	Miscellaneous financial loss	Broker / intermediary	Broker / intermediary
		C0010	C0015	C0110	C0150	C0170	C0230	C0250	C0260	C0630	C0680
Other income or expenditure											
Other comprehensive income	R1610	0	0	0	0	0	0	0	0		
Total comprehensive income in the period	R1620	44,950	0	0	0	0	0	0	0		
Dividends paid or payable in period	R1630	0	0	0	0	0	0	0	0		
Balance sheet (Solvency II basis) at end of the period											
Assets - investments	R1910	180,112	0	0	0	0	0	0	0		
Assets - reinsurance recoverables	R1915	111	0	0	0	0	0	0	0		
Assets - total	R1920	210,116	0	0	0	0	0	0	0		
Best estimate - gross of reinsurance	R1930	2,751	0	0	0	0	0	0	0		
Best estimate claim provision - gross of reinsurance	R1940		39,705	0	0	0	0	0	0		
Best estimate premium provision - gross of reinsurance	R1945		-12,349	0	0	0	0	0	0		
Risk margin	R1950	2,751	2,751	0	0	0	0	0	0		
Total liabilities	R1960	102,223	0	0	0	0	0	0	0		
Own funds and SCR											
Basic own funds at end of the period	R2100	124,429	0	0	0	0	0	0	0		
Tier 1	R2110	107,893	0	0	0	0	0	0	0		
Amount of tier 1 injected during the period	R2120	0	0	0	0	0	0	0	0		
Tier 2	R2130	16,536	0	0	0	0	0	0	0		
Amount of tier 2 injected during the period	R2140	0	0	0	0	0	0	0	0		
Tier 3	R2150	0	0	0	0	0	0	0	0		
Ancillary own funds at end of the period	R2170	0	0	0	0	0	0	0	0		
Eligible own funds at end of the period	R2180	124,429	0	0	0	0	0	0	0		
SCR at end of the period	R2190	59,341	0	0	0	0	0	0	0		

IR.17.01.01.01

All monetary amounts presented in £'000

Non-life technical provisions

		Direct business and accepted proportional reinsurance						
		Medical expense insurance	Other motor insurance	Fire and other damage to property insurance	Credit and suretyship insurance	Assistance	Miscellaneous financial loss	Total non-life obligation
		C0020	C0060	C0080	C0100	C0120	C0130	C0180
Best estimate								
Premium provisions								
Gross - Total	R0060	969	8,739	9,188	4,846	969	(37,060)	(12,349)
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	0	0	0	0	0	(51,139)	(51,139)
Net Best Estimate of Premium Provisions	R0150	969	8,739	9,188	4,846	969	14,079	38,790
Claims provisions								
Gross - Total	R0160	2,265	4,334	5,482	4,110	2,265	21,249	39,705
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	111	0	1,317	0	111	15,636	17,175
Net Best Estimate of Claims Provisions	R0250	2,154	4,334	4,166	4,110	2,154	5,613	22,530
Total Best estimate - gross	R0260	3,234	13,074	14,670	8,956	3,234	(15,811)	27,356
Total Best estimate - net	R0270	3,123	13,074	13,353	8,956	3,123	19,692	61,320
Risk margin	R0280	14	60	61	516	14	2,084	2,751
Technical provisions - total								
Technical provisions - total	R0320	3,248	13,134	14,731	9,472	3,248	(13,727)	30,107
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	111	0	1,317	0	111	(35,503)	(33,964)
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	R0340	3,137	13,134	13,415	9,472	3,137	21,776	64,071

Total (no breakdown by currency)

All monetary amounts presented in £'000

Non-life claim development

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

	Year	0	1	2	3	4	5	6	7	8	9	10&+		In Current year	Sum of all years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
Prior	R0100											105,920	R0100	0	105,920
N-9	R0160	0	0	0	0	0	0	0	51,151	0	0		R0160	0	51,151
N-8	R0170	0	0	0	0	0	0	63,048	0	0			R0170	0	63,048
N-7	R0180	0	0	0	0	0	75,426	0	0				R0180	0	75,426
N-6	R0190	0	0	0	0	84,737	0	0					R0190	0	84,737
N-5	R0200	242	298	21	98,376	7	0						R0200	0	98,944
N-4	R0210	1,155	359	114,810	71	8							R0210	8	116,403
N-3	R0220	1,500	149,947	687	344								R0220	344	152,478
N-2	R0230	165,417	24,637	3,160									R0230	3,160	193,213
N-1	R0240	188,289	25,322										R0240	25,322	213,611
N	R0250	196,160											R0250	196,160	196,160
													Total R0260	224,995	1,351,091

Gross undiscounted Best Estimate Claims Provisions - Development year (absolute amount)

	Year	0	1	2	3	4	5	6	7	8	9	10&+		Year end (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0350		C0360
Prior	R0100											0	R0100	0
N-9	R0160	0	0	0	0	0	0	0	0	0	0		R0160	0
N-8	R0170	0	0	0	0	0	0	0	0	0			R0170	0
N-7	R0180	0	0	0	0	0	0	0	0				R0180	0
N-6	R0190	0	0	0	0	0	0	0					R0190	0
N-5	R0200	0	0	0	0	0	0						R0200	0
N-4	R0210	0	0	0	0	0							R0210	0
N-3	R0220	0	0	0	0								R0220	0
N-2	R0230	0	0	0									R0230	0
N-1	R0240	0	0										R0240	0
N	R0250	40,996											R0250	39,705
													Total R0260	39,705

IR.23.01.01.01

All monetary amounts presented in £'000

Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	3,006	3,006		0	
Share premium account related to ordinary share capital	R0030	5,994	5,994		0	
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	0	0		0	
Subordinated mutual member accounts	R0050	0		0	0	0
Surplus funds	R0070	0	0			
Preference shares	R0090	0		0	0	0
Share premium account related to preference shares	R0110	0		0	0	0
Reconciliation reserve	R0130	98,893	98,893			
Subordinated liabilities	R0140	16,536		0	16,536	0
An amount equal to the value of net deferred tax assets	R0160	0				0
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0	0	0	0	0
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
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	0				
Total basic own funds	R0290	124,429	107,893	0	16,536	0
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	0			0	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0			0	
Unpaid and uncalled preference shares callable on demand	R0320	0			0	0
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0			0	0
Letters of credit and guarantees	R0340	0			0	
Letters of credit and guarantees other	R0350	0			0	0
Supplementary members calls	R0360	0			0	
Supplementary members calls - other	R0370	0			0	0
Other ancillary own funds	R0390	0			0	0
Total ancillary own funds	R0400	0			0	0

IR.23.01.01.01
Own funds

All monetary amounts presented in £'000

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	124,429	107,893	0	16,536	0
Total available own funds to meet the MCR	R0510	124,429	107,893	0	16,536	
Total eligible own funds to meet the SCR	R0540	124,429	107,893	0	16,536	0
Total eligible own funds to meet the MCR	R0550	113,234	107,893	0	5,341	
SCR	R0580	59,341				
MCR	R0600	26,703				
Ratio of Eligible own funds to SCR	R0620	2.10				
Ratio of Eligible own funds to MCR	R0640	4.24				

Reconciliation reserve

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	107,893
Own shares (held directly and indirectly)	R0710	0
Foreseeable dividends, distributions and charges	R0720	0
Deductions for participations in financial and credit institutions	R0725	0
Other basic own fund items	R0730	9,000
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	0
Reconciliation reserve	R0760	98,893

IR.25.04.01.01
Solvency Capital Requirement

		Gross solvency capital requirement
Net of loss-absorbing capacity of technical provisions		**C0110**
Market risk	**R0140**	**8,876**
Interest rate risk	**R0070**	1,655
Equity risk	**R0080**	3,802
Property risk	**R0090**	1,589
Spread risk	**R0100**	2,201
Concentration risk	**R0110**	5,351
Currency risk	**R0120**	102
Diversification within market risk	**R0130**	(5,824)
Counterparty default risk	**R0180**	**2,964**
Type 1 exposures	**R0150**	2,945
Type 2 exposures	**R0160**	25
Diversification within counterparty default risk	**R0170**	(6)
Life underwriting risk	**R0270**	**956**
Longevity risk	**R0200**	956
Diversification within life underwriting risk	**R0260**	0
Total health underwriting risk	**R0320**	**2,776**
Health non SLT risk	**R0290**	2,776
Non-life underwriting risk	**R0370**	**44,542**
Non-life premium and reserve risk (ex catastrophe risk)	**R0330**	33,865
Non-life catastrophe risk	**R0340**	21,665
Lapse risk	**R0350**	958
Diversification within non-life underwriting risk	**R0360**	(11,947)
Intangible asset risk	**R0400**	**0**
Operational and other risks	**R0430**	**11,964**
Operational risk	**R0422**	11,964
Other risks	**R0424**	0
Total before all diversification	**R0432**	**89,856**
Total before diversification between risk modules	**R0434**	**72,079**
Diversification between risk modules	R0436	(10,653)
Total after diversification	**R0438**	**61,426**
Loss-absorbing capacity of technical provisions	**R0440**	0
Loss-absorbing capacity of deferred taxes	**R0450**	(2,085)
Other adjustments	**R0455**	0
Solvency capital requirement including undisclosed capital add-on	**R0460**	59,341
Disclosed capital add-on - excluding residual model limitation	**R0472**	0
Disclosed capital add-on - residual model limitation	**R0474**	0
Solvency capital requirement including capital add-on	**R0480**	59,341
Undisclosed capital add-on - residual model limitation	**R0482**	0
Capital add-on	**R0484**	0
Biting interest rate scenario	**R0490**	0
Biting life lapse scenario	**R0495**	0

IR.28.01.01.01

All monetary amounts presented in £'000

Minimum Capital Requirement - Only life or only non-life activity

Linear formula component for non-life insurance and reinsurance obligations		C0010
MCR$_{NL}$ Result	R0010	51,689

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020	3,123	15,057
Income protection insurance and proportional reinsurance	R0030	0	0
Workers' compensation insurance and proportional reinsurance	R0040	0	0
Motor vehicle liability insurance and proportional reinsurance	R0050	0	0
Other motor insurance and proportional reinsurance	R0060	13,074	2,504
Marine, aviation and transport insurance and proportional reinsurance	R0070	0	0
Fire and other damage to property insurance and proportional reinsurance	R0080	13,353	21,614
General liability insurance and proportional reinsurance	R0090	0	0
Credit and suretyship insurance and proportional reinsurance	R0100	8,956	2,523
Legal expenses insurance and proportional reinsurance	R0110	0	0
Assistance and proportional reinsurance	R0120	3,123	15,057
Miscellaneous financial loss insurance and proportional reinsurance	R0130	19,692	322,918
Non-proportional health reinsurance	R0140	0	0
Non-proportional casualty reinsurance	R0150	0	0
Non-proportional marine, aviation and transport reinsurance	R0160	0	0
Non-proportional property reinsurance	R0170	0	0

Linear formula component for life insurance and reinsurance obligations		C0040
MCR$_{NL}$ Result	R0200	0

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

Overall MCR calculation		C0070
Linear MCR	R0300	51,689
SCR	R0310	59,341
MCR cap	R0320	26,703
MCR floor	R0330	14,835
Combined MCR	R0340	26,703
Absolute floor of the MCR	R0350	3,500
Minimum Capital Requirement	R0400	26,703

IR.02.01.01.01
Balance sheet

All monetary amounts presented in £'000

		Solvency II value
Assets		**C0010**
Intangible assets	**R0030**	0
Deferred tax assets	**R0040**	0
Pension benefit surplus	**R0050**	0
Property, plant & equipment held for own use	**R0060**	0
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	25,616
Property (other than for own use)	**R0080**	0
Holdings in related undertakings, including participations	**R0090**	0
Equities	**R0100**	0
Equities - listed	**R0110**	0
Equities - unlisted	**R0120**	0
Bonds	**R0130**	0
Government Bonds	**R0140**	0
Corporate Bonds	**R0150**	0
Structured notes	**R0160**	0
Collateralised securities	**R0170**	0
Collective Investments Undertakings	**R0180**	25,532
Derivatives	**R0190**	84
Deposits other than cash equivalents	**R0200**	0
Other investments	**R0210**	0
Assets held for index-linked and unit-linked contracts	**R0220**	0
Loans and mortgages	**R0230**	0
Loans on policies	**R0240**	0
Loans and mortgages to individuals	**R0250**	0
Other loans and mortgages	**R0260**	0
Reinsurance recoverables from:	**R0270**	(1,453)
Non-life and health similar to non-life	**R0280**	0
Life and health similar to life, excluding health and index-linked and unit-linked	**R0315**	(1,453)
Life index-linked and unit-linked	**R0340**	0
Deposits to cedants	**R0350**	0
Insurance and intermediaries receivables	**R0360**	1,790
Reinsurance receivables	**R0370**	0
Receivables (trade, not insurance)	**R0380**	24
Own shares (held directly)	**R0390**	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	**R0400**	0
Cash and cash equivalents	**R0410**	6,728
Any other assets, not elsewhere shown	**R0420**	0
Total assets	**R0500**	**32,706**

IR.02.01.01.01
Balance sheet

All monetary amounts presented in £'000

		Solvency II value
Liabilities		**C0010**
Technical provisions - total	**R0505**	(2,430)
Technical provisions - non-life	**R0510**	0
Technical provisions - life	**R0515**	(2,430)
Best estimate - total	**R0542**	(3,352)
Best estimate - non-life	**R0544**	0
Best estimate - life	**R0546**	(3,352)
Risk margin - total	**R0552**	922
Risk margin - non-life	**R0554**	0
Risk margin - life	**R0556**	922
Transitional (TMTP) - life	**R0565**	0
Other technical provisions	**R0730**	0
Contingent liabilities	**R0740**	0
Provisions other than technical provisions	**R0750**	0
Pension benefit obligations	**R0760**	0
Deposits from reinsurers	**R0770**	0
Deferred tax liabilities	**R0780**	475
Derivatives	**R0790**	0
Debts owed to credit institutions	**R0800**	0
Financial liabilities other than debts owed to credit institutions	**R0810**	0
Insurance & intermediaries payables	**R0820**	0
Reinsurance payables	**R0830**	911
Payables (trade, not insurance)	**R0840**	11,996
Subordinated liabilities	**R0850**	0
Subordinated liabilities not in Basic Own Funds	**R0860**	0
Subordinated liabilities in Basic Own Funds	**R0870**	0
Any other liabilities, not elsewhere shown	**R0880**	0
Total liabilities	**R0900**	**10,953**
Excess of assets over liabilities	**R1000**	**21,753**

IR.05.03.01.01

All monetary amounts presented in £'000

Life income and expenditure

		Insurance with profit participation	Index-linked and unit-linked insurance	Life annuities	Non-life annuities	Other life insurance	Health insurance	Total life and health
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
Income								
Premiums written								
Gross direct business	R0010	0	0	0	0	6,442	70	6,513
Gross reinsurance accepted	R0020	0	0	0	0	7,103	0	7,103
Gross	R0030	0	0	0	0	13,545	70	13,616
Reinsurers' share	R0040	0	0	0	0	1,119	0	1,119
Net	R0050	0	0	0	0	12,427	70	12,497
Investments and other income								
Investment income	R0060		0					629
Realised and unrealised gains / (losses)	R0070		0					909
Other income	R0080							330
Total income	R0090							14,365
Expenditure								
Claims incurred								
Gross direct business	R0110	0	0	0	0	6,041	(0)	6,041
Gross reinsurance accepted	R0120	0	0	0	0	2,035	0	2,035
Gross	R0130	0	0	0	0	8,076	(0)	8,076
Reinsurers' share	R0140	0	0	0	0	744	0	744
Net	R0150	0	0	0	0	7,332	(0)	7,332
Expenses incurred								
Gross direct business	R0160	0	0	0	0	2,359	46	2,405
Gross reinsurance accepted	R0170	0	0	0	0	2,407	0	2,407
Gross	R0180	0	0	0	0	4,765	46	4,811
Reinsurers' share	R0190	0	0	0	0	0	0	0
Net	R0200	0	0	0	0	4,765	46	4,811

IR.05.03.01.01

Life income and expenditure

All monetary amounts presented in £'000

		Insurance with profit participation	Index-linked and unit-linked insurance	Life annuities	Non-life annuities	Other life insurance	Health insurance	Total life and health
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
Analysis of gross expenses incurred								
Acquisition commission	R0210	0	0	0	0	2,062	21	2,082
Acquisition costs - other	R0220	0	0	0	0	0	0	0
Renewal commission	R0230	0	0	0	0	0	0	0
Administrative expenses	R0240	0	0	0	0	1,610	21	1,631
Investment management expenses	R0250	0	0	0	0	0	0	0
Claims management expenses	R0260	0	0	0	0	0	0	0
Overhead expenses	R0270	0	0	0	0	1,094	4	1,098
Interest payable	R0280	0	0	0	0	0	0	0
Taxation	R0290							61
Other expenses	R0300							310
Total expenditure	R0310							12,513
Transfers and dividends								
Business transfers-in	R0410							0
Business transfers-out	R0420							0
Transfers to(from) other funds	R0430							0
Dividends paid	R0440							12,000

IR.05.02.01.04

All monetary amounts presented in £'000

Premiums, claims and expenses by country

Life obligations

		Home country	Top 5 countries (by amount of gross premiums written) - life obligations					Total top 5 countries and home country
		C0150	C0160	C0170	C0180	C0190	C0200	C0210
	R1400		CZ	GR	HU	PL	SK	
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
Premiums written								
Gross	R1410	0	1,619	161	3,002	7,103	1,730	13,616
Reinsurers' share	R1420	0	485	0	299	0	335	1,119
Net	R1500	0	1,135	161	2,703	7,103	1,395	12,497
Premiums earned								
Gross	R1510	0	1,619	161	3,002	7,103	1,730	13,616
Reinsurers' share	R1520	0	485	0	299	0	335	1,119
Net	R1600	0	1,135	161	2,703	7,103	1,395	12,497
Claims incurred								
Gross	R1610	3,315	705	(22)	1,328	2,035	716	8,076
Reinsurers' share	R1620	0	309	0	140	(37)	331	744
Net	R1700	3,315	395	(22)	1,187	2,071	385	7,332
Net expenses incurred	R1900	310	432	39	764	3,123	452	5,121

IR.25.04.01.01
Solvency Capital Requirement

		Gross solvency capital requirement
Net of loss-absorbing capacity of technical provisions		**C0110**
Market risk	**R0140**	**2,913**
Interest rate risk	**R0070**	1,093
Equity risk	**R0080**	1,206
Property risk	**R0090**	0
Spread risk	**R0100**	518
Concentration risk	**R0110**	511
Currency risk	**R0120**	1,022
Diversification within market risk	**R0130**	(1,437)
Counterparty default risk	**R0180**	**420**
Type 1 exposures	**R0150**	411
Type 2 exposures	**R0160**	11
Diversification within counterparty default risk	**R0170**	(3)
Life underwriting risk	**R0270**	**7,078**
Mortality risk	**R0190**	2,506
Longevity risk	**R0200**	52
Life-expense risk	**R0220**	3,621
Lapse risk	**R0240**	3,564
Life catastrophe risk	**R0250**	88
Diversification within life underwriting risk	**R0260**	(2,754)
Total health underwriting risk	**R0320**	**3**
Health SLT risk	**R0280**	3
Health catastrophe risk	**R0300**	1
Diversification within health underwriting risk	**R0310**	(1)
Non-life underwriting risk	**R0370**	**74**
Non-life catastrophe risk	**R0340**	74
Diversification within non-life underwriting risk	**R0360**	0
Intangible asset risk	**R0400**	**0**
Operational and other risks	**R0430**	**545**
Operational risk	**R0422**	545
Other risks	**R0424**	0
Total before all diversification	**R0432**	**15,227**
Total before diversification between risk modules	R0434	11,032
Diversification between risk modules	R0436	(2,042)
Total after diversification	**R0438**	**8,990**

IR.25.04.01.01

Solvency Capital Requirement

		Gross solvency capital requirement
Net of loss-absorbing capacity of technical provisions		**C0110**
Loss-absorbing capacity of technical provisions	**R0440**	0
Loss-absorbing capacity of deferred taxes	**R0450**	(475)
Other adjustments	**R0455**	0
Solvency capital requirement including undisclosed capital add-on	**R0460**	8,515
Disclosed capital add-on - excluding residual model limitation	**R0472**	0
Disclosed capital add-on - residual model limitation	**R0474**	0
Solvency capital requirement including capital add-on	**R0480**	8,515
Undisclosed capital add-on - residual model limitation	**R0482**	0
Capital add-on	**R0484**	0
Biting interest rate scenario	**R0490**	0
Biting life lapse scenario	**R0495**	0

IR.12.01.01.01
Life technical provisions

		Other life insurance	Health insurance	Total life and health
		C0050	C0060	C0070
Best Estimate				
Gross Best Estimate	R0030	(3,353)	1	(3,352)
Gross Best Estimate (direct business)	R0025	(3,353)	1	(3,352)
Gross Best Estimate (reinsurance accepted)	R0026	0	0	0
Recoverables from reinsurance (except SPV and Finite Re) before adjustment for expected losses	R0040	(1,453)	0	(1,453)
Recoverables from reinsurance (except SPV and Finite Re) before adjustment for expected losses	R0050	(1,453)	0	(1,453)
Recoverables from reinsurance (except SPV and Finite Re) before adjustment for expected losses	R0060	0	0	0
Recoverables from reinsurance (except SPV and Finite Re) before adjustment for expected losses	R0070	0	0	0
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080	(1,453)	0	(1,453)
Best estimate minus recoverables from reinsurance/SPV and Finite Re	R0090	(1,900)	1	(1,899)
Risk Margin	R0100	0	0	0
Amount of the transitional on Technical Provisions				
Transitional Measure on Technical Provisions	R0180	922	0	922
TMTP - risk margin	R0140	922	0	922
TMTP - best estimate dynamic component	R0150	0	0	0
TMTP - best estimate non-dynamic component	R0160	0	0	0
TMTP - amortisation adjustment	R0170	0	0	0
Technical provisions - total	R0200	(4,275)	1	(4,274)
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0210	(2,821)	1	(2,821)
Surrender value	R0300	0	0	0
Nominal value of units	R0302	0	0	0
Matching value of units	R0304	0	0	0
Best estimate subject to transitional of the interest rate	R0310	0	0	0
Technical provisions without transitional on interest rate	R0320	0	0	0
Best estimate subject to volatility adjustment	R0330	0	0	0
Technical provisions without volatility adjustment and without other transitional measures	R0340	0	0	0
Best estimate subject to matching adjustment	R0350	0	0	0
Technical provisions without matching adjustment and without all the others	R0360	0	0	0

IR.23.01.01.01

All monetary amounts presented in £'000

Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	3,502	3,502		0	
Share premium account related to ordinary share capital	R0030	1,499	1,499		0	
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	0	0		0	
Subordinated mutual member accounts	R0050	0		0	0	0
Surplus funds	R0070	0	0			
Preference shares	R0090	0		0	0	0
Share premium account related to preference shares	R0110	0		0	0	0
Reconciliation reserve	R0130	16,753	16,753			
Subordinated liabilities	R0140	0		0	0	0
An amount equal to the value of net deferred tax assets	R0160	0				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0	0	0	0	0
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
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	0				
Total basic own funds	R0290	21,753	21,753	0	0	0
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	0			0	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0			0	
Unpaid and uncalled preference shares callable on demand	R0320	0			0	0
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0			0	0
Letters of credit and guarantees	R0340	0			0	
Letters of credit and guarantees other	R0350	0			0	0
Supplementary members calls	R0360	0			0	
Supplementary members calls - other	R0370	0			0	0
Other ancillary own funds	R0390	0			0	0
Total ancillary own funds	R0400	0			0	0

IR.23.01.01.01

All monetary amounts presented in £'000

Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	**C0020**	**C0030**	**C0040**	**C0050**
Available and eligible own funds						
Total available own funds to meet the SCR	**R0500**	21,753	21,753	0	0	0
Total available own funds to meet the MCR	**R0510**	21,753	21,753	0	0	
Total eligible own funds to meet the SCR	**R0540**	21,753	21,753	0	0	0
Total eligible own funds to meet the MCR	**R0550**	21,753	21,753	0	0	
SCR	**R0580**	8,515				
MCR	**R0600**	3,500				
Ratio of Eligible own funds to SCR	**R0620**	2.5546				
Ratio of Eligible own funds to MCR	**R0640**	6.2151				

Reconciliation reserve

		C0060
Reconciliation reserve		
Excess of assets over liabilities	**R0700**	21,753
Own shares (held directly and indirectly)	**R0710**	0
Foreseeable dividends, distributions and charges	**R0720**	0
Deductions for participations in financial and credit institutions	**R0725**	0
Other basic own fund items	**R0730**	5,000
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	**R0740**	0
Reconciliation reserve	**R0760**	16,753

IR.28.01.01.01

All monetary amounts presented in £'000

Minimum Capital Requirement - Only life or only non-life activity

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

		C0010
MCR$_{NL}$ Result	R0010	0

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

Linear formula component for life insurance and reinsurance obligations		C0040
MCR$_{NL}$ Result	R0200	0

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	0	
Obligations with profit participation - future discretionary benefits	R0220	0	
Index-linked and unit-linked insurance obligations	R0230	0	
Other life (re)insurance and health (re)insurance obligations	R0240	0	
Total capital at risk for all life (re)insurance obligations	R0250		27,617

Overall MCR calculation		C0070
Linear MCR	R0300	0
SCR	R0310	8,515
MCR cap	R0320	3,832
MCR floor	R0330	2,129
Combined MCR	R0340	2,129
Absolute floor of the MCR	R0350	3,500
Minimum Capital Requirement	R0400	3,500

IR.32.01.04.01
Undertakings in the scope of the group

Identification code and type of code of the undertaking	Country	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/ non mutual)	Supervisory Authority	Identification code and type of code of the immediate parent of the undertaking	Legal name of the immediate parent of the undertaking
C0020	C0010	C0040	C0050	C0060	C0070	C0080	C0081	C0082
LEI/2138004RADPM6P4RN187	GB	Red Sands Group Holdings Limited	5 (Insurance Holding Company)		2 (Non-mutual)	Gibraltar Financial Services Commission	LEI/2138007Z9VQ7WDJQZM23	MANZILLO HOLDINGS LIMITED
LEI/213800SIYMT42CKY2R50	GB	Red Sands Insurance Company (Europe) Limited	2 (Non-Life Insurance Company)		2 (Non-mutual)	Gibraltar Financial Services Commission	LEI/2138004RADPM6P4RN187	Red Sands Group Holdings Limited
LEI/213800YI4HA4IJ5HMS03	GB	Red Sands Life Assurance Company (Europe) Limited	1 (Life Insurance Company)		2 (Non-mutual)	Gibraltar Financial Services Commission	LEI/2138004RADPM6P4RN187	Red Sands Group Holdings Limited

Identification code and type of code of the undertaking		Ranking criteria (in the group currency)							
		Total Balance Sheet (for (re)insurance undertakings)	Total Balance Sheet (for other regulated undertakings)	Total Balance Sheet (non-regulated undertakings)	Written premiums net of reinsurance ceded under IFRS or local GAAP for (re)insurance undertakings	Turn over defined as the gross revenue under IFRS or local GAAP for other types of undertakings or insurance holding companies	Underwriting performance	Investment performance	Total performance
C0020		C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160
LEI/2138004RADPM6P4RN187		208,546	0	0	391,725	414,740	44,111	10,155	46,151
LEI/213800SIYMT42CKY2R50		176,040	0	0	379,228	401,125	44,104	8,678	44,950
LEI/213800YI4HA4IJ5HMS03		32,706	0	0	12,497	13,616	1,388	1,476	1,224

Identification code and type of code of the undertaking	Criteria of influence						Inclusion in the scope of Group supervision		Group solvency calculation
	% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	Yes/No	Date of decision if art. 214 is applied	Method used and under method 1, treatment of the undertaking
C0020	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
LEI/2138004RADPM6P4RN187							Yes		1 (Method 1: Full Consolidation)
LEI/2138005IYMT42CKY2R50	100.0000	100.0000	100.0000		1 (Dominant)	100.0000	Yes		1 (Method 1: Full Consolidation)
LEI/213800YI4HA4IJ5HMS03	100.0000	100.0000	100.0000		1 (Dominant)	100.0000	Yes		1 (Method 1: Full Consolidation)

IR.02.01.01.01
Balance Sheet

All monetary amounts presented in £'000

		Solvency II value
Assets		**C0010**
Goodwill	**R0010**	
Deferred acquisition costs	**R0020**	
Intangible assets	**R0030**	0
Deferred tax assets	**R0040**	0
Pension benefit surplus	**R0050**	0
Property, plant & equipment held for own use	**R0060**	1,221
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	161,297
Property (other than for own use)	**R0080**	0
Holdings in related undertakings, including participations	**R0090**	0
Equities	**R0100**	693
Equities - listed	**R0110**	0
Equities - unlisted	**R0120**	693
Bonds	**R0130**	27,403
Government Bonds	**R0140**	21,739
Corporate Bonds	**R0150**	5,663
Structured notes	**R0160**	0
Collateralised securities	**R0170**	0
Collective Investments Undertakings	**R0180**	133,087
Derivatives	**R0190**	115
Deposits other than cash equivalents	**R0200**	0
Other investments	**R0210**	0
Assets held for index-linked and unit-linked contracts	**R0220**	0
Loans and mortgages	**R0230**	11,362
Loans on policies	**R0240**	0
Loans and mortgages to individuals	**R0250**	0
Other loans and mortgages	**R0260**	11,362
Reinsurance recoverables from:	**R0270**	(35,418)
Non-life and health similar to non-life	**R0280**	(33,964)
Life and health similar to life, excluding index-linked and unit-linked	**R0315**	(1,453)
Life index-linked and unit-linked	**R0340**	0
Deposits to cedants	**R0350**	0
Insurance and intermediaries receivables	**R0360**	9,246
Reinsurance receivables	**R0370**	10,075
Receivables (trade, not insurance)	**R0380**	(419)
Own shares (held directly)	**R0390**	0
Amounts due in respect of own fund items or initial fund called up but not yet paid in	**R0400**	0
Cash and cash equivalents	**R0410**	51,182
Any other assets, not elsewhere shown	**R0420**	0
Total assets	**R0500**	**208,546**

IR.02.01.01.01
Balance Sheet

All monetary amounts presented in £'000

		Solvency II value
Liabilities		**C0010**
Technical provisions - total	**R0505**	27,677
Technical provisions - non-life	**R0510**	30,107
Technical provisions - life	**R0515**	(2,430)
Best estimate - total	**R0542**	24,004
Best estimate - non-life	**R0544**	27,356
Best estimate - life	**R0546**	(3,352)
Risk margin - total	**R0552**	3,673
Risk margin - non-life	**R0554**	2,751
Risk margin - life	**R0556**	922
Transitional (TMTP) - life	**R0565**	0
Other technical provisions	**R0730**	
Contingent liabilities	**R0740**	0
Provisions other than technical provisions	**R0750**	0
Pension benefit obligations	**R0760**	0
Deposits from reinsurers	**R0770**	0
Deferred tax liabilities	**R0780**	2,560
Derivatives	**R0790**	42
Debts owed to credit institutions	**R0800**	0
Financial liabilities other than debts owed to credit institutions	**R0810**	0
Insurance & intermediaries payables	**R0820**	0
Reinsurance payables	**R0830**	911
Payables (trade, not insurance)	**R0840**	31,240
Subordinated liabilities	**R0850**	16,536
Subordinated liabilities not in Basic Own Funds	**R0860**	0
Subordinated liabilities in Basic Own Funds	**R0870**	16,536
Any other liabilities, not elsewhere shown	**R0880**	0
Total liabilities	**R0900**	**78,966**
Excess of assets over liabilities	**R1000**	**129,579**

IR.05.04.02.01

Non-life income and expenditure: reporting period

			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	Motor vehicle other motor insurance - personal lines	Fire and other damage to property insurance - personal lines	Credit and suretyship insurance	Assistance	Miscellaneous financial loss
		C0010	C0015	C0110	C0150	C0170	C0230	C0250	C0260
Income									
Premiums written									
Gross written premiums	R0110		401,125	15,320	2,504	23,919	2,556	15,320	341,505
Gross written premiums - insurance (direct)	R0111		401,125	15,320	2,504	23,919	2,556	15,320	341,505
Gross written premiums - accepted reinsurance	R0113		-	-	-	-	-	-	-
Net written premiums	R0160		379,228	15,057	2,504	21,932	2,555	15,057	322,122
Premiums earned and provision for unearned									
Gross earned premiums	R0210		398,833	14,482	11,480	21,290	2,480	14,482	334,618
Net earned premiums	R0220		376,936	14,220	11,480	19,303	2,479	14,220	315,235
Expenditure									
Claims incurred									
Gross (undiscounted) claims incurred	R0610		224,147	5,279	7,987	11,584	- 148	5,279	194,166
Gross (undiscounted) direct business	R0611		224,147	5,279	7,987	11,584	- 148	5,279	194,166
Gross (undiscounted) reinsurance accepted	R0612		-	-	-	-	-	-	-
Net (undiscounted) claims incurred	R0690		211,503	5,168	7,987	11,145	- 148	5,168	182,183
Net (discounted) claims incurred	R0730	211,503	211,503						
Analysis of expenses incurred									
Technical expenses incurred net of reinsurance ceded	R0910	119,103							
Acquisition costs, commissions, claims management costs	R0985	107,834	107,834	7,506	2,018	4,535	670	7,506	85,599
Other expenditure									
Other expenses	R1140	-							
Total expenditure	R1310	340,958							

IR.05.03.01.01

Life income and expenditure

All monetary amounts presented in £'000

		Other life insurance	Health insurance	Total life and health
		C0050	C0060	C0070
Income				
Premiums written				
Gross direct business	R0010	6,442	70	6,513
Gross reinsurance accepted	R0020	7,103	0	7,103
Gross	R0030	13,545	70	13,616
Reinsurers' share	R0040	1,119	0	1,119
Net	R0050	12,427	70	12,497
Investments and other income				
Investment income	R0060			629
Realised and unrealised gains / (losses)	R0070			909
Other income	R0080			330
Total income	R0090			14,365
Expenditure				
Claims incurred				
Gross direct business	R0110	6,041	(0)	6,041
Gross reinsurance accepted	R0120	2,035	0	2,035
Gross	R0130	8,076	(0)	8,076
Reinsurers' share	R0140	744	0	744
Net	R0150	7,332	(0)	7,332
Expenses incurred				
Gross direct business	R0160	2,359	46	2,405
Gross reinsurance accepted	R0170	2,407	0	2,407
Gross	R0180	4,765	46	4,811
Reinsurers' share	R0190	0	0	0
Net	R0200	4,765	46	4,811
Analysis of gross expenses incurred				
Acquisition commission	R0210	2,062	21	2,082
Acquisition costs - other	R0220	0	0	0
Renewal commission	R0230	0	0	0
Administrative expenses	R0240	1,610	21	1,631
Investment management expenses	R0250	0	0	0
Claims management expenses	R0260	0	0	0
Overhead expenses	R0270	1,094	4	1,098
Interest payable	R0280	0	0	0
Taxation	R0290			61
Other expenses	R0300			310
Total expenditure	R0310			12,513
Transfers and dividends				
Business transfers-in	R0410			0
Business transfers-out	R0420			0
Transfers to(from) other funds	R0430			0
Dividends paid	R0440			12,000

IR. IR.05.02.01.

All monetary amounts presented in £'000

Premiums, claims and expenses by country

Non-life obligations

		Home country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total top 5 countries and home country
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	R0010		GB	IE	PL			
		C0080	C0090	C0100	C0110	C0120	C0150	C0140
Premiums written								
Gross - Direct Business	R0110	0	401,125	0	0	0	0	401,125
Gross - Proportional reinsurance accepted	R0120	0	0	0	0	0	0	0
Gross - Non-proportional reinsurance accepted	R0130	0	0	0	0	0	0	0
Reinsurers' share	R0140	0	21,897	0	0	0	0	21,897
Net	R0200	0	379,228	0	0	0	0	379,228
Premiums earned								
Gross - Direct Business	R0210	0	398,824	8	0	0	0	398,833
Gross - Proportional reinsurance accepted	R0220	0	0	0	0	0	0	0
Gross - Non-proportional reinsurance accepted	R0230	0	0	0	0	0	0	0
Reinsurers' share	R0240	0	21,897	0	0	0	0	21,897
Net	R0300	0	376,927	8	0	0	0	376,936
Claims incurred								
Gross - Direct Business	R0310	0	225,731	(3)	0	0	0	225,728
Gross - Proportional reinsurance accepted	R0320	0	0	0	0	0	0	0
Gross - Non-proportional reinsurance accepted	R0330	0	0	0	0	0	0	0
Reinsurers' share	R0340	0	12,644	0	0	0	0	12,644
Net	R0400	0	213,087	(3)	0	0	0	213,083
Net expenses incurred	R0550	(892)	123,144	0	0	0	0	122,252

IR.05.02.01.04

All monetary amounts presented in £'000

Premiums, claims and expenses by country

Life obligations

		Home country	Top 5 countries (by amount of gross premiums written) - life obligations					Total top 5 countries and home country
		C0150	C0160	C0170	C0180	C0190	C0200	C0210
	R1400		CZ	GR	HU	PL	SK	
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
Premiums written								
Gross	R1410	0	1,619	161	3,002	7,103	1,730	13,616
Reinsurers' share	R1420	0	485	0	299	0	335	1,119
Net	R1500	0	1,135	161	2,703	7,103	1,395	12,497
Premiums earned								
Gross	R1510	0	1,619	161	3,002	7,103	1,730	13,616
Reinsurers' share	R1520	0	485	0	299	0	335	1,119
Net	R1600	0	1,135	161	2,703	7,103	1,395	12,497
Claims incurred								
Gross	R1610	3,315	705	(22)	1,328	2,035	716	8,076
Reinsurers' share	R1620	0	309	0	140	(37)	331	744
Net	R1700	3,315	395	(22)	1,187	2,071	385	7,332
Net expenses incurred	R2600	310	432	39	764	3,123	452	5,121

S.23.01.22
Own Funds

All monetary amounts presented in £'000

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	758	758		0	
Non-available called but not paid in ordinary share capital at group level	R0020	0	0		0	
Share premium account related to ordinary share capital	R0030	13,343	13,343		0	
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	0	0		0	
Subordinated mutual member accounts	R0050	0		0	0	0
Non-available subordinated mutual member accounts at group level	R0060	0		0	0	0
Surplus funds	R0070	0	0			
Non-available surplus funds at group level	R0080	0	0			
Preference shares	R0090	0		0	0	0
Non-available preference shares at group level	R0100	0		0	0	0
Share premium account related to preference shares	R0110	0		0	0	0
Non-available share premium account related to preference shares at group level	R0120	0		0	0	0
Reconciliation reserve	R0130	103,479	103,479			
Subordinated liabilities	R0140	16,536		0	16,536	0
Non-available subordinated liabilities at group level	R0150	579		0	579	0
An amount equal to the value of net deferred tax assets	R0160	0				0
The amount equal to the value of net deferred tax assets not available at the group level	R0170	0				0
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0	0	0	0	0
Non available own funds related to other own funds items approved by supervisory authority	R0190	0	0	0	0	0
Minority interests (if not reported as part of a specific own fund item)	R0200	0	0	0	0	0
Non-available minority interests at group level	R0210	0	0	0	0	0

S.23.01.22
Own Funds

All monetary amounts presented in £'000

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	0				
Deductions						
Deductions for participations where there is non-availability of information	R0250	0	0	0	0	0
Deduction for participations included by using D&A when a combination of methods is used	R0260	0	0	0	0	0
Total of non-available own fund items	R0270	579	0	0	579	0
Total deductions	R0280	**579**	**0**	**0**	**579**	**0**
Total basic own funds after deductions	R0290	**133,536**	**117,579**	**0**	**15,957**	**0**
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	0			0	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0			0	
Unpaid and uncalled preference shares callable on demand	R0320	0			0	0
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0			0	0
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0			0	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	0			0	0
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	0			0	
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	0			0	0
Non available ancillary own funds at group level	R0380	0			0	0
Other ancillary own funds	R0390	0			0	0
Total ancillary own funds	R0400	0			0	0

S.23.01.22
Own Funds

All monetary amounts presented in £'000

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Own funds of other financial sectors						
Credit institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies - total	R0410	0	0	0	0	
Institutions for occupational retirement provision	R0420	0	0	0	0	0
Non regulated entities carrying out financial activities	R0430	0	0	0	0	
Total own funds of other financial sectors	R0440	0	0	0	0	0
Own funds when using the D&A, exclusively or in combination of method 1						
Own funds aggregated when using the D&A and combination of method	R0450	0	0	0	0	0
Own funds aggregated when using the D&A and combination of method net of IGT	R0460	0	0	0	0	0
Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from undertakings included via D&A)	R0520	133,536	117,579	0	15,957	0
Total available own funds to meet the minimum consolidated group SCR	R0530	133,536	117,579	0	15,957	
Total eligible own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from undertakings included via D&A)	R0560	133,536	117,579	0	15,957	0
Total eligible own funds to meet the minimum consolidated group SCR	R0570	133,536	117,579	0	15,957	
Consolidated Group SCR	R0590	61,495				
Minimum consolidated Group SCR	R0610	3,500				
Ratio of Eligible own funds to the consolidated Group SCR (excluding other financial sectors and the undertakings included via D&A)	R0630	2.1715				
Ratio of Eligible own funds to Minimum Consolidated Group SCR	R0650	38.1531				
Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&A)	R0660	133,536	117,579	0	15,957	0
SCR for entities included with D&A method	R0670					
Group SCR	R0680	61,495				
Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A	R0690	2.1715				

S.23.01.22
Own Funds
Reconciliation reserve

All monetary amounts presented in £'000

		C0060
Reconciliation reserve		
Excess of assets over liabilities	**R0700**	129,579
Own shares (held directly and indirectly)	**R0710**	0
Foreseeable dividends, distributions and charges	**R0720**	12,000
Deductions for particpations in financial and credit institutions	**R0725**	0
Other basic own fund items	**R0730**	14,100
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	**R0740**	0
Other non-available own funds	**R0750**	0
Reconciliation reserve	**R0760**	**103,479**

IR.25.04.04.01

Solvency Capital Requirement

		C0010
Net of loss-absorbing capacity of technical provisions		
Market risk	**R0140**	**10,696**
Interest rate risk	**R0070**	1,153
Equity risk	**R0080**	5,006
Property risk	**R0090**	1,589
Spread risk	**R0100**	2,718
Concentration risk	**R0110**	5,979
Currency risk	**R0120**	926
Diversification within market risk	**R0130**	(6,675)
Counterparty default risk	**R0180**	**3,284**
Type 1 exposures	**R0150**	3,257
Type 2 exposures	**R0160**	36
Diversification within counterparty default risk	**R0170**	(9)
Life underwriting risk	**R0270**	**7,304**
Mortality risk	**R0190**	2,506
Longevity risk	**R0200**	1,008
Life-expense risk	**R0220**	3,621
Lapse risk	**R0240**	3,564
Life catastrophe risk	**R0250**	88
Diversification within life underwriting risk	**R0260**	(3,484)
Total health underwriting risk	**R0320**	**2,778**
Health SLT risk	**R0280**	3
Health non SLT risk	**R0290**	2,776
Health catastrophe risk	**R0300**	1
Diversification within health underwriting risk	**R0310**	(2)
Non-life underwriting risk	**R0370**	**44,584**
Non-life premium and reserve risk (ex catastrophe risk)	**R0330**	33,865
Non-life catastrophe risk	**R0340**	21,727
Lapse risk	**R0350**	958
Diversification within non-life underwriting risk	**R0360**	(11,967)
Intangible asset risk	**R0400**	**0**
Operational and other risks	**R0430**	**12,509**
Operational risk	**R0422**	12,509
Total before all diversification	**R0432**	**103,291**
Total before diversification between risk modules	**R0434**	**81,155**
Diversification between risk modules	R0436	(17,100)
Total after diversification	**R0438**	**64,055**

IR.25.04.04.01

Solvency Capital Requirement

		C0010
Net of loss-absorbing capacity of technical provisions		
Loss-absorbing capacity of technical provisions	R0440	0
Loss-absorbing capacity of deferred taxes	R0450	(2,560)
Other adjustments	R0455	0
Solvency capital requirement including undisclosed capital add-on	R0460	61,495
Disclosed capital add-on - excluding residual model limitation	R0472	0
Disclosed capital add-on - residual model limitation	R0474	0
Solvency Capital Requirement including capital add-on	R0480	61,495
Undisclosed capital add-on - residual model limitation	R0482	0
Capital add-on	R0484	0
Biting interest rate scenario	R0490	0
Biting life lapse scenario	R0495	0
Information on other entities		
Capital requirement for other financial sectors (Non-insurance capital requir	R0500	0
Capital requirement for other financial sectors (Non-insurance capital requir	R0510	0
Capital requirement for other financial sectors (Non-insurance capital requir	R0520	0
Capital requirement for other financial sectors (Non-insurance capital requir	R0530	0
Capital requirement for non-controlled participation requirements	R0540	0
Capital requirement for residual undertakings	R0550	0
Overall SCR		
Solvency capital requirement (consolidation method)	R0555	0
SCR for undertakings included via D and A	R0560	0
SCR for sub-groups included via D and A	R0565	0
Solvency capital requirement	R0570	61,495