

Collinson Holdings Europe Limited

Single Group Solvency and Financial Condition Report for the year ended 30 April 2024



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CIEL KEY ACHIEVEMENTS



Insurance revenue increased by 17% from €95m in FY23 to €111m in FY24.



CIEL (the Company) Solvency Capital Requirement (SCR) Coverage Ratio increased by 18% from 206% in FY23 to 224% in FY24 against a target of 175%.



Key distribution partner relationships extended, and material new affinity partnerships won.



Significant underwriting and pricing experience resulting in sustainable performance and profitable growth across the insurance distribution partnership.



Continued investment in digitalisation to further enhance the customer experience.



Continued investment in automation and data capabilities to support our insight strategy.



Development of the Insurance ESG strategy in alignment with the Collinson Group's.

Our DNA

Value propositions

Design products that fulfil customers' needs and align with our strategic affinity distribution partners.

Optimal Balance Sheet

Our active risk management combined with our reinsurance partners support efficient balance sheet management and generate enhanced returns, underpinned by experienced Underwriting and Pricing capability.

Brilliant Customer Experience

Combining seamless digital journeys with human interaction at the most critical times.

Innovation

Continued Investment in high levels of automation to deliver enhanced customer outcomes.

Executive Summary

The Directors of Collinson Insurance Europe Limited (“CIEL” or “the Company” or “Insurance undertaking”) present the Single Group Solvency and Financial Condition Report (“SFCR”) for the year ended 30 April 2024. A Single Group SFCR has been prepared further to approval received from the Malta Financial Services Authority (“MFSA”) on 23 September 2019.

Collinson Insurance Europe Limited is the entity responsible for fulfilling the governance requirements at Group level. The Companies falling within the Group are Collinson Holdings Europe Limited (“CHEL” or “the Parent”) as an EEA Insurance Holding Company and CIEL as an Insurance Undertaking. Together, CIEL and CHEL are referred to as “The Group”. The Group falls under Article 213(2)(b) of the Solvency II Directive.

CHEL holds an investment in Collinson Insurance Solutions Europe Limited (“CISEL” or “the insurance intermediary”) an Insurance Intermediary licenced under the Insurance Distribution Act. The Directors of CIEL have determined that CISEL should be classified as a strategic participation when considering the requirements of Article 335 of the Solvency II Delegated Regulation and EIOPA published Q&A ID 649.

CHEL, as the immediate parent of CIEL, undertakes the role of an intermediary between its subsidiaries and the ultimate beneficiary owner. The Parent does not undertake any additional role or commercial activities. The Parent was incorporated on the 17 December 2018.

CIEL’s principal activity is that of underwriting general insurance business. The Company was incorporated on 20 December 2018 and was granted a licence in terms of Section 7 of the Insurance Business Act, 1998 (Cap. 403 of the Laws of Malta) to write business of insurance within Classes 1, 2,7, 8, 9, 13, 16, 17 and 18 on 25 February 2019. In June 2023, the MFSA approved the extension of authorisation of Collinson Insurance Europe Limited and Collinson Insurance Solutions Europe Limited to write business of insurance in general business Class 3 – Land Vehicles.

Accordingly, in producing information to meet the individual reporting requirements of the Company and the Group, separate disclosures are provided. However, as CIEL is responsible for fulfilling the governance requirements, all references to Operations, Compliance and Risk Management, and Internal Audit throughout this document refers to those in place at the insurance undertaking and therefore no distinction is drawn between the Company and the Group, when providing group information.

This SFCR has been prepared to allow the Parent to comply with the Pillar III reporting requirements under Directive 2009/138/EC and associated Regulations (‘the Solvency II Directive’).

All figures represented in this document are in Euro (“EUR”, “€”) unless otherwise noted.

Business and Performance

The current financial period of the Group covers the period from 1 May 2023 to 30 April 2024 (FY24). The comparative figures cover the period from 1 May 2022 to 30 April 2023 (FY23).

Business Objectives

CIEL is a specialist insurer operating within niche segments of the general insurance personal lines market. CIEL writes Travel, International Private Medical Insurance (IPMI), Dental, as well as specialist and ancillary personal lines insurance products distributed via sophisticated affinity partner brands. As a diversified, niche personal lines insurer, CIEL’s vision is “to provide protection and peace of mind in the best interests of customers so they enjoy their travel experiences whilst looking after their health and personal possessions”.

During FY24, the business continued to see growth across its IPMI, Dental and Travel Insurance portfolio’s with existing clients as well as strong recovery on its motor excess waiver book.

Executive Summary

The business expects to consolidate and build on this growth, continue to renew key affinity partner contractual arrangements as well as introduce new clients and products building on the specialist expertise that exists in the Group.

The business will continue to grow efficiently because of previous investments in digitalising and automating the travel insurance customer journey. This continues to offer our customers choice of channel throughout their claims journey and empowers our claims staff to reduce the end-to-end cycle time which lowers cost and increases customer satisfaction.

CIEL's insurance product offering is entirely consistent with Collinson's wider travel ecosystem strategy. It focuses not only on developing insurance products and services to meet the needs of customers, providing valuable protection and assistance products and services, but also on building long term relationships with clients to maximise the brand experience of their customers.

Growth delivered along with a focus on containing costs and good underwriting disciplines has resulted in improved financial performance. The portfolio is projected to continue to grow because of increased new business through existing affinity partner relationships and newly originated business, as we:

- Continue to seek new affinity distribution partners for Travel insurance.
- Continue to seek new clients that fit our appetite across specialist and ancillary personal lines insurance products.

Overall Performance for Financial Year ended 30 April 2024

During the current financial year, CHEL generated a loss before tax of €12,157 (2023: profit before tax of €1,529k).

In FY24, CIEL applied IFRS 17 Insurance Contracts for the first time. IFRS 17 replaces IFRS 4 Insurance Contracts for annual periods on or after 1 January 2023. As a result, CIEL has restated comparative information for 2023 and 2022 by applying the transitional provisions to IFRS 17. The adoption of IFRS 17 did not change the classification of the Company's insurance and reinsurance contracts. The Company has also adopted IFRS 9 Financial Instruments from 1 May 2023 and comparatives have been retrospectively restated. The application of IFRS 9 to the Company's financial instruments has not had a significant impact on the financial position and/or financial performance of the Company. The application of IFRS 9 has had no impact on the cash flows of the Company.

The Company has applied the premium allocation approach (PAA) to all the insurance contracts that it issues and reinsurance contracts that it holds. The Company's insurance contracts issued for the business have a coverage period of one year. Moreover, the Company has demonstrated that the value of the liability for remaining coverage under the PAA approach does not differ materially when this is valued under the General Measurement Model for reinsurance contracts held, which contract boundary is longer than 1 year.

The level of business for the Company's year of operations has been satisfactory. During the year ended 30 April 2024, CIEL reported an insurance revenue of €111,009,988 (2023: €95,270,574). CIEL has experienced continued growth across its existing clients and products as well as seen strong recovery in motor ancillary premiums. The existing and new business provides a strong balance of diversification to the Company. Insurance service expenses amounted to €105,649,413 (2023: €92,139,690). The increase in insurance services expenses reflects the strengthening in loss ratios from 30.61% to 40.38%, which is characterised by scheme loss ratios returning back to plan in FY24, but also higher losses being incurred on the health portfolio of the Company during the year.

The movement in the net expenses from reinsurance contracts held takes into consideration the strengthening of the loss ratio as well as the impact of discounting which has moved materially in FY24.

Executive Summary

As a result, the insurance service result for the year ended 30 April 2024 amounted to €769,425 (2023: €313,959).

The net insurance finance income from insurance contracts issued and reinsurance contracts held amounted to €517,213 (2023: €194,513). The movement reflects the effect of changes in interest rates given the considerable change in discount rates between FY23 and FY24.

Investment income for the year amounted to €1,052,545 (2023: €215,920). The increase in investment return is attributable to the Company continuing to invest in high quality short-dated money market funds.

The Group's financial position is satisfactory, and the Directors expect that the present level of activity will continue to grow in the foreseeable future. The shareholders' funds of the Group amounted to €14,026k (2023: €13,099k) and reflect the results of the Group entities generated during the financial year ended 30 April 2024.

Systems of Governance

The Company maintains a robust system of governance which is commensurate to the nature, scale and complexity of the Company's activities and its risk profile.

The system of governance revolves around the Board, the Audit Committee, the Underwriting and Claims Committee and the Risk and Compliance Committee. The Risk Management Function is outsourced to external service providers, in line with the Company's Outsourcing Policy.

The mainstay of the system of governance is the risk management system, which is designed to ensure that all the material risks are identified, and that policies and procedures are in place to assess their potential impact and to adequately report them, so that they can be managed or mitigated. The Company recognises the importance of having an effective risk management system embedded throughout all its areas.

CIEL has established a risk management framework, supported by a Risk Strategy, Risk Appetite Framework and Board policies, to manage the risks faced by the business. All components of the risk management framework are shown in the illustration below highlighting how each component interacts with another.



There has been no material change to the underlying System of Governance of the Company during the year under review, other than the establishment of an Audit Committee as a Board Delegated Committee.

Executive Summary

Risk Profile

The acceptance of risk is fundamental to CIEL and a core element of the overall strategic objectives as an insurance undertaking.

Each of the elements of the Risk Management Framework contribute to the identification, measurement, monitoring, management, and reporting of risks and is intended to work as an integrated system, and therefore each should be considered both in terms of the specific function of the respective element, and in terms of its function within the overall system. Each element of the system is embedded effectively within the Company and managed by the Risk Management Function with appropriate oversight from the Risk and Compliance Committee and the Board of Directors of CIEL.

The Company's main risk is in respect of the business of writing insurance as this is the principal activity. The risk under any one insurance contract is that the actual claims and benefit payments or the timing thereof, differ from expectations. This is influenced by the frequency of claims, severity of claims and actual benefits paid. Therefore, the objective of the Company is to ensure that sufficient reserves are available to cover these liabilities.

Other risks relate to counterparty default risk in relation to insurance and reinsurance receivables and short-term investments, market risk in relation to liquidity risk and asset-liability management ("ALM"), operational and compliance risks.

The Directors have considered that the Parent does not add any material operational risk to the Group since it carries out no activities and holds minimal cash at bank. However, the strategic participation which the Parent holds in CISEL adds material market risk exposure and increases the own funds of the Group significantly.

Valuation and Capital Management

The Group abides by the Solvency II Directive (2009/138/EC) which ascertains the level of the required regulatory capital on the basis of the risks they undertake, in terms of the Insurance Business Act, 1998 (Chapter 403, Laws of Malta) and the applicable Insurance Rules issued under the Insurance Business Act by the Malta Financial Services Authority. Solvency II outlines how the own funds shall be derived by converting the Statement of financial position from an International Financial Reporting Standards (IFRS) perspective to one where assets and liabilities are measured in line with their underlying economic value.

The Directors of CIEL are actively involved in the application of the Solvency II legislation and these are embedded in the Company's operations. Regular monitoring of the Solvency Capital Requirement ("SCR") and Minimum Capital Requirements ("MCR") is considered crucial, and a Capital Management Policy is in place to address the procedures and controls in this regard.

The Directors of CIEL monitor solvency through regular reviews and quarterly reporting of the net asset coverage over both the SCR and MCR.

Based on the SCR calculations as at 30 April 2024, the Company and the Group complied with the capital and solvency requirements as stipulated in the rules issued by the MFSA and within the Board approved risk appetite.

CIEL's solvency position as at 30 April 2024 was as follows:

	FY24 €'000	FY23 €'000
Company's Own Funds to cover the MCR	15,121	9,683
Minimum Capital Requirement	4,000	4,000
MCR Coverage Ratio	378%	242%

Executive Summary

Solvency Capital Requirement	FY24 €'000	FY23 €'000	Movement €'000
Non-Life Underwriting	3,095	2,041	1,054
Health Underwriting	2,624	1,819	805
Market Risk	1,743	781	962
Counterparty Default	435	836	(401)
Undiversified BSCR	7,897	5,477	2,420
Diversification	(2,703)	(1,860)	(843)
Base SCR	5,194	3,617	1,577
Operational Risk	1,558	1,085	473
Solvency Capital Requirement	6,752	4,702	2,050
Company's Own Funds to cover the SCR	15,121	9,683	5,438
SCR Coverage Ratio	224%	206%	18%

CHEL's solvency position as at 30 April 2024 was as follows:

	FY24 €'000	FY23 €'000
Group's Own Funds to cover the Minimum Consolidated Group SCR	17,992	13,025
Minimum Consolidated Group SCR	4,000	4,000
Minimum Consolidated Group SCR Coverage Ratio	450%	326%

Solvency Capital Requirement	FY24 €'000	FY23 €'000	Movement €'000
Non-Life Underwriting	3,095	2,041	1,054
Health Underwriting	2,624	1,819	805
Market Risk	2,187	1,235	952
Counterparty Default	435	836	(401)
Undiversified BSCR	8,341	5,931	2,410
Diversification	(2,856)	(2,050)	(806)
Base SCR	5,485	3,881	1,604
Operational Risk	1,646	1,164	482
Group Solvency Capital Requirement	7,131	5,045	2,086
Group's Own Funds to cover the SCR	17,992	13,025	4,967
Group SCR Coverage Ratio	252%	258%	(6%)

The main movements in the SCR of the Company from 30 April 2023 is due to the following reasons:

- Non-Life and Health Underwriting risk has increased mainly due to an increase in forecast business volumes as well as a lower level of quota share reinsurance, both of which have increased the premium and reserve risk. The lapse risk has also increased due to higher expected profits in future premium.
- Market risk has increased largely as a result of increased Interest Rate risk and Spread risk, due to higher assets under management and an increase in the mismatch between the duration of the assets and liabilities.

Executive Summary

- Counterparty Default risk has reduced due to lower quota share recoveries on the funds transferred reinsurance and cash at bank reducing (due to more funds being transferred to the money market fund where it earns a higher return).
- Operational risk has increased due to it being capped at 30% of the Basic SCR (i.e. it has increased in line with the increases in the Basic SCR).

The Eligible Own Funds have increased over the financial year due to profit on the retained earned premium; investment returns; and a one-off reduction in Technical Provisions due to changes in the methodology used to calculate expenses and the cashflow profile used to calculate the discounting benefit.

At the level of the Group, the movement can be explained by the following additional reasons:

- The market risk for the Group, has also increased due to the increases for the Company, although this has been offset slightly by a lower net asset value of CISEL, which has decreased the equity risk from this strategic participation.
- In addition, the Group's Own Funds to cover the SCR, has increased from last year due to the higher Own Funds of the Company.

Based on management calculations, the Company and the Group expects to continue meeting the Solvency II capitalisation requirements and remain within the Board approved risk appetite going forward.

The Board of CIEL approved the latest Own Risk and Solvency Assessment ("ORSA") on 5 August 2024 and is confident that the Group shall remain solvent under normal business conditions during the planning period.

The Board of CIEL also carried out several stresses to the realistic assessment and is satisfied that the Group shall remain solvent during the planning period.

A. Business and Performance

A. Business and Performance

A.1 Business and External Environment

Basic Information

Name of undertaking: Collinson Holdings Europe Limited

Company number: C89896

Legal status: CHEL acts as an investment company by holding shares in subsidiary companies.

CIEL is a Company authorised by the MFSa to carry on the business of insurance and reinsurance in accordance with Insurance Business Act (Cap 403 of the laws of Malta).

Name of supervisory authority: Malta Financial Services Authority
Contact details: Ray Schembri
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Name of external auditors: Ernst & Young Malta Ltd
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Tel: +35621342134
<http://www.ey.com/>

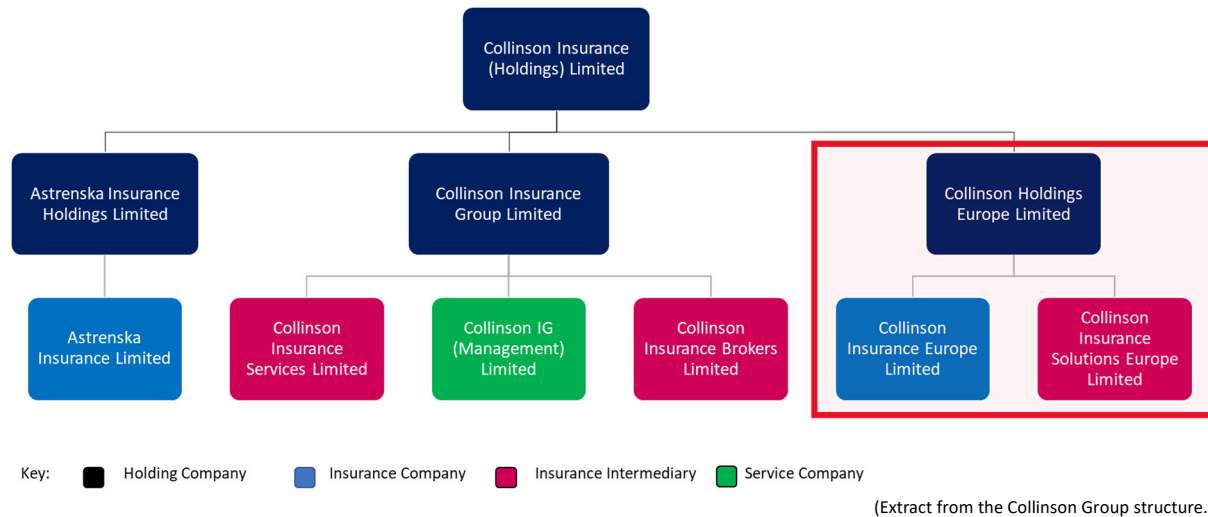
A. Business and Performance

Group structure and ownership

CIEL and CISEL are 100% owned by Collinson Holdings Europe Limited. CHEL sits within the Insurance Division of The Collinson Group Limited as a direct subsidiary of Collinson Insurance Holdings Limited (CIHL).

The ultimate holding company of CIHL is Parminder Limited, a company incorporated in the Isle of Man. The ultimate controlling parties identified by Parminder Limited are the Trustees of the Colin Evans 1987 Settlement, established under Laws of the Isle of Man, the beneficiary of which is Mr C R Evans.

The Structure of the Group is shown below:



Business Objectives

CIEL is a specialist insurer operating within niche segments of the general insurance personal lines market. CIEL writes Travel, International Private Medical Insurance (IPMI), Dental, as well as specialist and ancillary personal lines insurance products distributed via sophisticated affinity partner brands. As a diversified, niche personal lines insurer CIEL’s vision is “to provide protection and peace of mind in the best interests of customers so they enjoy their travel experiences whilst looking after their health and personal possessions”.

During FY24, the business continued to see growth across its IPMI, Dental and Travel Insurance portfolios with existing clients as well as strong recovery on its motor excess waiver book. The business expects to consolidate and build on this growth, continue to renew key affinity partner contractual arrangements as well as introduce new clients and products building on the specialist expertise that exists in the Group. The business will continue to grow efficiently because of previous investments in digitalising and automating the travel insurance customer journey. This continues to offer our customers choice of channel throughout their claims journey and empowers our claims staff to reduce the end-to-end cycle time which lowers cost and increases customer satisfaction.

CIEL’s insurance product offering is entirely consistent with Collinson’s wider travel ecosystem strategy. It focuses not only on developing insurance products and services to meet the needs of customers, providing valuable protection and assistance products and services, but also on building long term relationships with clients to maximise the brand experience of their customers.

Growth delivered along with a focus on containing costs and good underwriting disciplines has resulted in improved financial performance. The portfolio is projected to continue to grow because of increased new business through existing affinity partner relationships and newly originated business, as we:

- Continue to seek new affinity distribution partners for Travel insurance.
- Continue to seek new clients that fit our appetite across specialist and ancillary personal lines insurance products.

A. Business and Performance

As part of the ongoing ORSA process, the Board agreed to have a 3-year planning period for the Group being FY25 as the short term, FY26 and FY27 in the medium term. The Board is of the opinion that forecasting further than 2027 is difficult due to uncertainty resulting from the market conditions.

There are no significant legal or regulatory issues that are expected to affect the Group negatively in FY25.

There were no significant events in the reporting period which would require disclosure or adjustment to the financial statements.

Business Written

The Solvency II Lines of Business written by CIEL are Medical Expense Insurance (International Health, Dental and medical elements of Travel), Assistance (non-medical elements of Travel), Other Motor (Collision Damage Waiver), Damage to Property (Gadget) and Miscellaneous Financial Loss (Ticket Cancellation).

CISEL acts as an insurance intermediary with CIEL on part of the above-mentioned portfolio of business and continues to run-off travel and dental insurance books for an insurer for which it acted as intermediary.

Material Transactions with Shareholders and Members of the Board of Directors

Trading transactions with related parties and year end balances arising from these transactions are disclosed in Note 23 to the Audited Financial Statements of CIEL and Note 23 of CISEL.

Any other matters

There is no other information to be submitted.

A. Business and Performance

A.2 Underwriting Performance

Overall Performance for Financial Year ended 30 April 2024

During the current financial year, CHEL generated a loss before tax of €12,157 (2023: profit before tax of €1,529k arising from a net dividend income received from one of its subsidiaries, CISEL, during the financial year of €1m).

In 2024, CIEL applied IFRS 17 Insurance Contracts for the first time. IFRS 17 replaces IFRS 4 Insurance Contracts for annual periods on or after 1 January 2023. As a result, CIEL has restated comparative information for 2023 and 2022 by applying the transitional provisions to IFRS 17. The adoption of IFRS 17 did not change the classification of the Company's insurance and reinsurance contracts. The Company has also adopted IFRS 9 Financial Instruments from 1 May 2023 and comparatives have been retrospectively restated. The application of IFRS 9 to the Company's financial instruments has not had a significant impact on the financial position and/or financial performance of the Company. The application of IFRS 9 has had no impact on the cash flows of the Company.

The Company has applied the premium allocation approach (PAA) to all the insurance contracts that it issues and reinsurance contracts that it holds. The Company's insurance contracts issued for the business have a coverage period of one year. Moreover, the Company has demonstrated that the value of the liability for remaining coverage under the PAA approach does not differ materially when this is valued under the General Measurement Model for reinsurance contracts held, which contract boundary is longer than 1 year.

The table below shows the Income Statement for the year ended 30 April 2024.

Income Statement	FY24	FY23	Movement
	€'000	€'000	€'000
Insurance revenue	111,010	95,271	15,739
Insurance service expenses	(105,649)	(92,140)	(13,509)
Net expenses from reinsurance contracts held	(4,591)	(2,817)	(1,774)
Insurance service result	770	314	456
Investment income	1,053	216	837
Net investment income	1,053	216	837
Finance expenses from insurance contracts issued	(471)	(62)	(409)
Finance income from reinsurance contracts held	988	256	732
Net insurance finance income	517	194	323
Net insurance and investment result	2,340	724	1,616
Other operating expenses	(188)	(375)	187
Profit before income tax	2,152	349	1,803
Income tax expense	(753)	(122)	(631)
Profit for the year – total comprehensive income	1,399	227	1,172

The level of business for the Company's year of operations has been satisfactory. During the year ended 30 April 2024, CIEL reported an insurance revenue of €111,009,988 (2023: €95,270,574). CIEL has experienced continued growth across its existing clients and products as well as seen strong recovery in motor ancillary premiums. The existing and new business provides a strong balance of diversification to the Company. Insurance service expenses amounted to €105,649,413 (2023: €92,139,690). The increase in insurance services expenses reflects the strengthening in loss ratios from 30.61% to 40.38%, which is characterised by scheme loss ratios returning back to plan in FY24, but also higher losses being incurred on the health portfolio of the Company during the year.

The movement in the net expenses from reinsurance contracts held takes into consideration the strengthening of the loss ratio as well as the impact of discounting which has moved materially in FY24.

A. Business and Performance

As a result, the insurance service result for the year ended 30 April 2024 amounted to €769,425 (2023: €313,959).

The net insurance finance income from insurance contracts issued and reinsurance contracts held amounted to €517,213 (2023: €194,513). The movement reflect the effect of changes in interest rates given the considerable change in discount rates between FY23 and FY24.

Information on the material geographical areas in which CIEL carries out business is provided in the Appendices as part of S.04.05 template.

The Company and the Group's financial position is satisfactory, and the Directors expect that the present level of activity will continue to grow in the foreseeable future. The shareholders' funds of the Group amounted to €14,026k (2023: €13,099k) and reflects the results of the Group entities generated during the financial year ended 30 April 2024.

The Group maintains a system of governance which is commensurate to the nature, scale, and complexity of the Group's operation. The mainstay of the system of governance is the risk management system, which is designed to ensure that all the material risks are identified, managed, and mitigated.

The principal risks from the general insurance business arise from; fluctuations in the timing, frequency and severity of claims compared to our expectations; inadequate reinsurance protection; and inadequate reserving.

CIEL manages these risks through an underwriting and reserving policy that is approved by the Board of Directors after having considered the Underwriting Committee's advice.

Group Transactions

Trading transactions with related parties and year end balances arising from these transactions are disclosed in Note 23 to the Audited Financial Statements of CIEL.

A.3 Investment Performance

The table below lays out the composition of CIEL investment portfolio as at 30 April:

	FY24	FY23	Movement
	€'000	€'000	€'000
Financial assets at FVTPL	30,558	20,951	9,607
Total	30,558	20,951	9,607

Financial assets measured at FVTPL consist of:

- A rated money market funds denominated in Euro. The investment return consisted mainly of interest income. The amount invested is subject to a number of parameters, including limits on investment with a single counterparty and the investment rating being at minimum A rated.

The investment choices are dictated by the investment policy. The policy ensures the Company maintains a high quality, diversified portfolio of short-dated deposits with capital preservation and positive investment returns helping to guide our investment decisions. As from FY 23, CIEL started to invest a portion of its assets in money market funds. This allows CIEL to gain a reasonable return on its available assets to support the operations, while also ensuring adherence to the prudent person principle and adequate liquidity since such investments are callable within 1 day notice. 97% of total investments are held in Euro, with the remaining portion held in GBP.

The Company regularly compares the returns and the duration of its investments with the average duration of the liabilities to policyholders under insurance contracts. Any gap between the duration of the assets and the

A. Business and Performance

estimated average duration of the liabilities is managed by maintaining short term deposits and cash at bank and cash equivalents.

The Company targets returns in accordance with its authorised investment policy. Investment return comprises of interest income and is net of investment expenses and charges. Investment income gross of expenses for 2024 was of €1,053k (2023: €216k). All investment return/ charges are recognised in the Income Statement. The Company did not hold any investments in securitisation. Details of the Company's investment performance can be found in Note 9 to the Audited Financial Statements of CIEL.

A.4 Performance of other activities

There are no material other activities to note in the reporting period.

A.5 Any Other information

The euro area economy recovered at the start of 2024 by more than expected in ECB projections, with a boost from net trade and rising household spending. Information suggests continued growth in the short run, at a higher pace than previously foreseen. Real disposable income should continue to increase, amid robust wage growth, gradually increasing confidence and improving terms of trade, giving rise to a consumption-driven recovery in the course of 2024. GDP growth is expected to be 0.9% in 2024, and to strengthen to 1.4% in 2025 and 1.6% in 2026. Headline inflation is projected to move broadly sideways in the near term, before moderating further to levels close to target in the course of 2025. Wage growth is set to remain elevated, driven by persistent tightness in the labour market, but it should gradually ease over the project in horizon as upward impacts from inflation compensation fade.

The European Central Bank (ECB) reduced interest rates by 25 basis points during June 2024 after 9 months of holding rates steady following their updated assessment on the inflation outlook. Since September 2023, inflation has reduced by more than 2.5 percentage points and the inflation outlook has improved markedly. This matter is closely monitored as this could have a material impact on our current investment approach.

The current geopolitical environment in the EU and EEA is characterised by several significant risks and uncertainties that could impact its macroeconomic landscape. Key geopolitical issues include Russia/Ukraine conflict, Middle East tensions, US-China relations, domestic and global elections (especially in US) and Cybersecurity threats.

The world is experiencing a shift towards multipolarity with more powerful actors, including swing states like India, Saudi Arabia, and Turkey, influencing global geopolitics. This complexity requires the EU and EEA to adapt its foreign and economic policies to a more fragmented and competitive international environment.

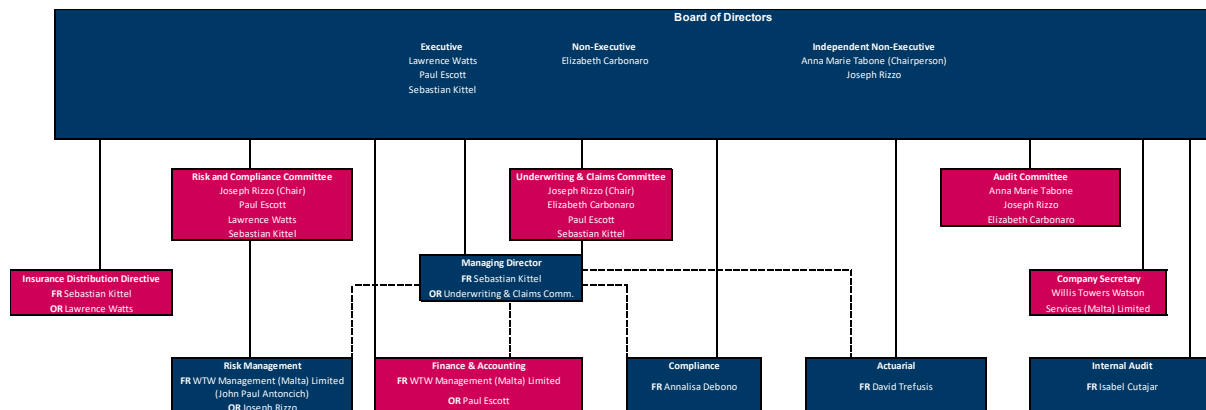
Depending on how these risks unfold over time, this could impact CIEL through increased claims costs, possible reductions in new business and lapses to cover at renewal. The Company has analysed and reflected any potential impacts in the stress and scenario testing carried out as part of its ORSA that shows that CIEL continues to remain resilient to macro-economic shocks (including inflation and exchange rate shifts) as well as a defined set of 'severe but plausible' more extreme events.

B. System of Governance

B. System of Governance

B.1 General Information on the System of Governance

The system of governance structure of CIEL as at 30 April 2024 is depicted in the structure chart below:



Board of Directors (“BoD”)

The following describes the Board of Directors of the Company. The Executive Directors make up the Management body.

The Board of Directors is the body of appointed members who will jointly oversee the activities of the Company.

The Board shall exercise its delegated authority as determined by the Memorandum and Articles of Association of CIEL and any other applicable legislation. The Board answers directly to the Shareholders of CIEL. The Board of Directors is governed by a Terms of Reference which is approved annually by the Board of Directors.

The Board of Directors of CIEL as at 30 April 2024 were:

Name	Position	Date of Appointment
Anne Marie Tabone	Independent Non-Executive Director (Chair)	20 December 2018
Lawrence David Watts	Executive Director	29 April 2020
Paul Escott	Executive Director	20 December 2018
Elizabeth Carbonaro	Non-Executive Director	20 December 2018
Sebastian Matthias Kittel	Executive Director	29 March 2021
Joseph Mary Rizzo	Independent Non-Executive Director	20 December 2018

The BoD of CIEL shall be of sufficient size and possess the necessary experience and expertise to oversee the operations of CIEL. The composition of the BoD is designed to ensure that:

- It can adequately discharge its responsibilities and duties whilst managing any innate conflict of interest;
- It has a proper understanding of, and competencies to deal with, the current and emerging issues of the business; and
- It can effectively review and assess the performance of its outsourced arrangements.

There shall be a minimum of four Directors and a maximum of ten and CIEL by ordinary resolution may from time to time increase or reduce the maximum or increase the minimum.

The Board of Directors will be made up of a mix of individuals who have the necessary skills and expertise in market knowledge, business strategy and business model, systems of governance, financial and actuarial analysis and regulatory framework and requirements.

B. System of Governance

The Board of Directors is made up of a mix of Executive Directors, Non-Executive Directors, and Independent Non-Executive Directors.

A key role of the BoD is to engender an ethical culture within its respective company and provide entrepreneurial leadership within the bounds of the overall strategy. This is achieved within a framework of prudent and effective controls designed to identify, assess, and monitor key risks.

The BoD have the following **duties and responsibilities**:

- Provide entrepreneurial leadership of CIEL within a framework of prudent and effective controls which enable risk to be assessed and managed.
- Set CIEL's strategic aims, ensure that the necessary financial resources are in place for the Company to meet its objectives.
- Set CIEL's values and standards and ensure that its obligations to its shareholders and others are understood and met.
- Comply with the Memorandum and Articles of Association of the Company.
- Comply with requirements set out in the Maltese Companies Act and Maltese Insurance Business Act (Cap 403) and comply with the General Good Requirements for all classes of business in each country within which CIEL is operating.
- Assume responsibility for the day-to-day conduct of CIEL's business. Clearly and appropriately apportion significant responsibilities to the Insurance Manager and other third-party providers.
- Oversee the establishment and maintenance of robust and clearly documented systems and controls in accordance with applicable regulations.
- Review and approve (as applicable) business submitted by the Underwriting and Claims Committee.
- Oversee the process of outsourcing; and
- Monitor the discharge of the Compliance, Risk Management, Internal Audit and Actuarial functions.

The Board reviews its effectiveness annually. Each Director completes a Board Effectiveness Questionnaire and submits it to the Compliance Officer, or the person delegated for this purposes who collates the results and presents at the next Board Meeting. Furthermore, the Board of Directors is subject to the annual fit and proper analysis. The purpose of such analysis is to ensure that the Board Members remain fit and proper with respect to their roles. Each Director completes a questionnaire and submits to the Compliance Officer, or the person delegated for this purposes who collates the results. This questionnaire is also applicable to the key functions. This analysis was last conducted in January 2024 and was concluded satisfactorily.

Information on Remuneration Policies and Practice

The following principles are applied to remuneration within the Company;

- Senior members of staff covered by this policy will be remunerated in a manner which supports the aims of Regulatory requirements.
- Targets and measures will be set which support customer-centric behaviours.
- Senior staff will be remunerated against a balanced set of criteria.

The Independent Non-Executive Directors have no past or present employment with the ultimate shareholder. They have been selected for their knowledge and applicable regulations in Malta.

It is recognised that the INEDs may have other engagements with other companies. The contract between CIEL and its appointed INEDs states that any potential "conflict of interest" be declared. Conflicts are declared at every Board meeting.

INEDs are bound by confidentiality clauses in their personal contracts which continue beyond the end of the contract.

Following the re-appointment of the INEDs during 2024, there has been no change to the Remuneration Policies and Practice.

B. System of Governance

Remuneration of members of the management body

The Executive Directors representing the shareholder are directly employed by the Collinson Group whilst the two Independent Non-Executive Directors are remunerated by the Company. The non-executive Director representing the Managers is remunerated by Willis Towers Watson Management (Malta) Limited. The Managing Director is remunerated by the Company. Details of the amounts remunerated to Directors and Management can be found in Notes 10 and 11 to the Audited Financial Statements of CIEL.

Audit Committee

The functions of the Audit Committee up until financial year up till 30 April 2023 were vested with the Board of Directors. The Audit Committee was formed during Financial Year 2024. The Audit Committee Members of CIEL who held office at 30 April 2024 were:

Name	Position	Date of Appointment
Anne Marie Tabone	Chair	April 2024
Joseph Mary Rizzo	Member	April 2024
Elizabeth Carbonaro	Member	April 2024

The Audit Committee (“the AC”) is a Committee of the Board of Directors (“the Board”) and is answerable to the Board. The Audit Committee is responsible for assisting the Board with discharging its responsibilities for monitoring the integrity of the Company’s financial statements and the effectiveness of the systems of internal controls and to monitor the effectiveness, performance and objectivity of the statutory auditors and Internal Audit function. The Audit Committee is governed by a Terms of Reference which is approved annually by the Board of Directors.

The Audit Committee has the following **duties and responsibilities**:

External audit

- Consider the appointment, re-appointment or removal of the external auditor and oversee the selection process for a new auditor where required.
- If an external auditor resigns, evaluate the rationale or issues leading to this and decide whether any action is required.
- Monitor the independence and objectivity of the statutory auditors including review and approval of any non-audit services of the Company following guidance from the pre- approval of non-audit services policy.
- Monitor the performance and effectiveness of the statutory audit process, discussing issues raised by the auditors in the course of the audit and understanding their quality control procedures.
- Approve the terms of engagement in respect of the statutory audit and any non-audit services and, approving in advance the fees for both audit and non-audit services.
- Review the findings of the audit with the external auditor. This shall include, but not limited to, discussion of any major issues which arose during the audit and key accounting and audit judgements.
- Review and monitor management’s responsiveness to the external auditor’s findings and recommendations. Also review management representation letters before signature and give particular consideration to matters where representation has been requested that relate to non-standard issues.
- Review significant accounting and reporting issues and recent professional and regulatory pronouncements to understand the potential impact on financial statements. Consider key regulatory changes and discuss how such changes impact financial and non-financial reporting.

B. System of Governance

Internal audit

- Review and approve the internal audit charter and plan and monitor the effectiveness of the internal audit function, ensuring it has adequate resources and standing within the Company, access to information and unrestricted scope to enable the internal audit function to fulfil its responsibilities effectively.
- Consider the observations and recommendations of the internal audit function and monitor progress of internal audit plan and actions.
- Ensure the internal auditor has direct access to the Chair of the Board, the Committee Chair, providing independence from the executive and accountability to the Committee.

Internal controls & financial reporting

- Review and assess the adequacy and effectiveness of the systems for internal control including financial reporting and controls. Review the Company's financial reports and accounts to ensure integrity of the financial statements regarding consistency, accounting for unusual or significant transactions, use of appropriate standards, policies and estimation techniques, related party transactions and adequacy of disclosures.
- Review related party transactions submitted by management. Audit Committee shall be provided with the context, nature, value and rationale of the related party transaction and make a recommendation to the Board.
- Review the Company's annual report and financial statements and advise the Board whether they reflect a true, fair and accurate view of the financial position of the entities.
- Report to the Board on the outcome of the statutory audit including how the statutory audit contributed to the integrity of financial reporting and the role of the Committee in that process.
- Monitor the financial reporting process and submit recommendations or proposals to ensure its integrity.
- Ensure the timely production and filing of the Company's financial statements.

Governance

- Approve any relevant Policies and any changes thereto.
- Receive and consider information from other committees from across The Collinson Group which is relevant to the Company to review and assess its impact.
- Discuss what information and assurance it requires in order to properly carry out its role to review, monitor and provide assurance or recommendations to the Board and, where there are gaps, how these should be addressed. The Committee shall satisfy itself that these sources of assurance and information are sufficient and objective.
- Consider any training needs for new and existing members of the Committee. For new members, the induction programme should refer to the Terms of Reference and provide an overview of the Company's business model and strategy, core business, financial dynamics and risks. It should include an understanding of the principles of and developments in corporate reporting and regulation.
- To meet with management, the internal accountants / auditors and the independent auditor as often as the Committee deems reasonable.

B. System of Governance

Risk and Compliance Committee

The Risk and Compliance Committee Members of CIEL who held office during the period were:

Name	Position	Date of Appointment
Joseph Mary Rizzo	Chair	December 2021
Paul Escott	Member	December 2021
Lawrence David Watts	Member	December 2021
Sebastian Matthias Kittel	Member	December 2021

The Risk and Compliance Committee (“the RCC”) is a Committee of the Board of Directors (“the Board”) and is answerable to the Board.

The RCC shall exercise its delegated authority as determined by the Board, subject to the Memorandum and Articles of Association of the Company and any other applicable legislation.

The RCC is responsible for assisting the Board in its oversight of risk and compliance, agreeing the Company’s appetite for risk, and reviewing the effectiveness of the risk management framework and compliance with regulatory obligations. The RCC provides oversight and advice to the Board in relation to capital management ensuring sufficient capital is available to meet current and future requirements in an efficient manner consistent with Board approved Risk Appetite.

The RCC may adopt such policies, rules, recommendations, and actions as it deems advisable and are consistent with its responsibilities as set out in the relevant Company legislation and applicable Regulation.

The RCC Committee is governed by a Terms of Reference which is approved annually by the Board of Directors.

The **duties and responsibilities** of the RCC include the following:

Risk Management Framework

- Review and recommend to the Board for approval the Risk Management Strategy and the Risk Management Framework;
- Review and monitor the effectiveness of the Risk Management Framework and Risk Management Function to ensure all material risks have been identified and assessed;
- Develop and maintain a clearly defined risk management strategy consistent with the overall business strategy that sets Risk Appetite and tolerance;
- Review and monitor key risks including effectiveness of controls and action plans;
- Receive “deep dives” relating to key areas of risk to monitor effectiveness of controls and recommendations and plans including additional resource requirements;
- Review and monitor emerging risks and horizon scanning; and
- Approve risk management related policies.

Risk Appetite and Limits

- To approve the Risk Appetite Framework and the Risk Appetite Statement including related limits and triggers that comprise their Board Risk Measures;
- To receive regular reports on the RAG status of risk metrics within the Risk Appetite Statement; and
- To oversee management’s implementation of the Risk Management Framework and the embedding of risk appetite and culture within the Company, including management’s response to breaches of risk appetite (as defined in the Risk Appetite Statement and Framework).

B. System of Governance

Prudential Risk Management

- Receive quarterly analysis of current and future capital requirements and funds available to cover these requirements in line with risk appetite metrics e.g., return on capital employed (ROCE) and capital intensity ratios;
- Consider the methodology and processes used to determine the economic and capital requirements including forward looking requirements, ensuring the correct assumptions and potential impact of risks have been taken into consideration in determining capital requirements;
- Review adherence with risk appetites for investments and concentration limits for counterparties; aged debt and underwriting risk to maximise regulatory capital efficiency;
- To receive reports to explain the rationale for stress and scenario testing undertaken, including the impact of crystallisation of identified risks and threats. To consider the level of risk mitigation in place;
- Review and approve the Company's Own Risk and Solvency Assessments including Own Funds requirements and stress and scenario tests; and
- To consider and recommend to the Board for approval material regulatory submissions and returns following Executive review.

Risk Operating Model

- Review the operating model, adequacy, and effectiveness of resource within the Risk Management function, its access to information and its independence from Executive management.

Models

- Review the processes that control and validate the use of models.

Performance Review

- Arrange periodic assessments of its own performance and review periodically its terms of reference and recommend any changes to the Board for approval.

Escalation

- The Committee will report to the Board, identifying any matters within its remit in respect of which it considers that action or improvement is needed, and making recommendations as to the steps to be taken.

Regulatory Compliance

- To have oversight of the Compliance activity within the Company;
- To monitor the relationship with the Malta Financial Services Authority and other relevant regulatory bodies;
- To approve the compliance policy, compliance monitoring plan and review and monitor compliance assurance activity including reviews of internal processes and procedures and review of third-party agents;
- To monitor progress against the compliance plan;
- Monitor compliance with legal and regulatory requirements;
- To keep the Board abreast of new laws and changes to existing legislation;
- Review significant incidents and breaches including impact and remedial action and complaints report; and
- Consider referrals from management from time to time.

B. System of Governance

Underwriting and Claims Committee

The Underwriting and Claims Committee Members of CIEL who held office during the period were:

Name	Position	Date of Appointment
Joseph Mary Rizzo	Chair	December 2018
Paul Escott	Member	December 2018
Elizabeth Carbonaro	Member	December 2018
Sebastian Matthias Kittel	Member	March 2021

The Underwriting and Claims Committee (“the UWC Committee”) is a Committee of the Board of Directors (“the Board”) and is answerable to the Board.

The UWC Committee shall exercise its delegated authority as determined by the Board, subject to the Memorandum and Articles of Association of the Company and any other applicable legislation.

The UWC Committee is governed by a Terms of Reference which is approved annually by the Board of Directors.

To assist the Board in discharging its responsibilities the UWC Committee shall attend to the following:

Underwriting

- Determine and implement on behalf of the Company suitable premium and contract terms in respect of the Risks underwritten by the Company brought to it by its intermediaries’ network and refer to the Board accordingly;
- Review the retained risk, capital adequacy and solvency of the Company;
- Identify and assess potential new underwriting opportunities;
- Determine and review on an annual basis the Reinsurance Strategy of the Company;
- Review Security Ratings of Reinsurers;
- Review of arrangements with brokers, Reinsurers, and other Insurance Advisers;
- Provision of advice to the Board;
- Review the underwriting results of each portfolio on a quarterly basis;
- Review the POG process at Group level and UPGC decisions and product information in relation to CIEL products; and
- Determine and review, where required the claims policy and practices of the Undertaking and any such activities outsourced.

Claims

- Determine and annually review the claims reserving policy of the Company;
- Determine and annually review the Company’s claims protocol/communications strategy; and
- Review of major claims incurred, and appropriateness of reserves held.

Actuarial

- Exercise oversight of the Actuarial Function;
- Review the annual Actuarial Function Holder Report, including the Underwriting Opinion and Reinsurance Opinion and present updates and recommendations on action to the Board.

B. System of Governance

Delegation of Authority

- In exercising its delegated authority, the UWC Committee shall ensure that its decisions and recommendations support and promote the safeguarding of the Company's assets, the operation of adequate systems and control processes; and
- These terms of reference may from time to time be amended as required, subject to the approval of the Board.

The Chairman of the UWC Committee or his representative (a Board Member) shall report back to the Board on matters discussed and decisions taken, which fall within the ambit of the UWC Committee.

Key and Critical Functions

CIEL complies with the requirements under Solvency II and the Fitness & Probity Standards to ensure that Key Functions are held by persons with the appropriate knowledge, experience, and competence. The insurance undertaking has in place four Key Functions, being the Risk Management, Compliance, Actuarial and Internal Audit Functions. The Risk Management Function is outsourced by CIEL.

The Company has also classified its Underwriting and Claims function as a critical function.

Risk Management Function

The Risk Management Function is outsourced to Willis Towers Watson Management (Malta) Limited, with Mr Joseph Mary Rizzo acting as Board oversight.

Risk management lies at the heart of CIEL's business activities. The adopted risk appetite reflects the articulated risk profile set by the Board through its risk-return profiling of the identified key risks.

The Board is assisted by Willis Towers Watson Management (Malta) Limited being the outsourced service provider of this Function in setting risk management strategy, in developing a risk management framework of the Company's risk appetite, limits and tolerances, in establishing internal risk management structures, and in ensuring that the necessary resources are available and dedicated to achieving the risk management objectives.

Furthermore, Willis Towers Watson Management (Malta) Limited also assists the Board and other functions in assessing and defining the risks existing in specific risk areas and from those assessments developing written risk management policies and procedures to manage those risks. It also assists the Board in assessing the Company's capacity to absorb risk with due regard to the nature, probability, duration, correlation, and potential severity of risks, including looking at risks from different perspectives, such as by territory or by line of business. It also seeks to identify and assess emerging risks and advise the Board thereon.

The Risk Management function assists the Board in determining the acceptable risk limits for each risk type that are determined to facilitate control mechanisms to ensure that limits and procedures are adhered to, and that the Company is operating within the risk appetite parameters set by the Board.

As CIEL operates in a dynamic business environment, the Risk Management function provides a system to the Company to changes in the environment in which it operates and to modify the Risk Management system as necessary.

The Board is further assisted by Willis Towers Watson Management (Malta) Limited in performing the Own Risk and Solvency Assessment.

B. System of Governance

Compliance Function

The Compliance Function is an independent function giving guidance and coordinating the efforts and activities of CIEL as they relate to regulatory compliance. The Compliance function seeks to foster a culture of compliance; to facilitate compliance and to provide a quality assurance role to the Board as to the state of affairs of its businesses in relation to regulatory compliance.

The Compliance Function is carried out by Dr Annalisa Debono. Dr Annalisa Debono is the approved Compliance Officer, who is responsible for:

- Establishing a Compliance Policy and set out its planned activities, reviews, and monitoring in a Compliance Plan, which is submitted annually to the Board for review and approval;
- Facilitating reasonable access by the Company, its auditors and Regulator to information held by the Compliance Function in connection with the provision of the Services;
- Liaising with the Regulator in relation to changes in existing regulations and guidelines;
- Provide reasonable assurance that the business and its Tied Insurance Intermediaries are aware of and comply with the relevant law, rules, regulations, and standards;
- Assess the potential impact of changes in the legal environment for the Company;
- Submitting relevant regulatory returns to the Regulator and observe all reporting requirements imposed upon the Company by Regulator;
- Facilitates communication with the Malta Financial Services Authority on any other relevant topic;
- Providing to new Directors and officers, who are to undertake controlled functions requiring regulatory approval, appropriate documentation for submission to the Regulator, assisting with completion, submission, and response to follow-up enquiries in relation to the authorisation process, and submitting the appropriate filing upon the termination of a Director or officers' appointment.

Actuarial Function

The Board has ensured that an appropriately resourced Actuarial Function is established and maintained within CIEL. CIEL's Actuarial Function holder is Mr David Trefusis.

Further information on the Actuarial Function is provided in Section B.6.

Internal Audit Function

The Board has ensured that an appropriately resourced Internal Audit Function is established and maintained within CIEL. The Internal Audit function holder is Ms Isabel Cutajar.

Internal Audit is an independent, objective assurance and consulting activity which adds value to and improves CIEL's operations. It helps CIEL accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

Internal Audit activity evaluates the management and governance oversight covering key risks and the design and operating effectiveness of key controls. The output of each internal audit engagement is an audit report covering the overall audit opinion, key observations covering control failing or identified weaknesses and their potential impact, and the actions and timings which management have agreed to remediate.

The Internal Audit Function provides a formal report to the CIEL Audit Committee at every Audit Committee Meeting, typically quarterly. The Internal Audit Function holder reports directly to the Chair of the Audit Committee, Ms. Anne Marie Tabone.

Further information on the Internal Audit Function is provided in Section B.5.

B. System of Governance

Underwriting and Claims Key Function

The Company has defined Underwriting and Claims as a key function. The person responsible for this is the Managing Director, Mr. Sebastian Kittel, with oversight by the Underwriting and Claims Committee.

The role will cover the following areas of activity.

Underwriting

The Underwriting key function is closely aligned to CIEL's Underwriting Strategy and Reinsurance Strategy.

Assist in collating information and presenting to the Board and Underwriting Committees including:

- Annual underwriting deal reviews;
- Quarterly results reviews;
- Review of Reinsurance, XOL and Quota Share arrangements where required; and
- Underwriting decisions, including review and analysis of Quality Assurance.

Claims

- Review and sign off on claims and assistance cases over an agreed limit;
- CIEL delegates authority for smaller claims to the insurance operations teams of the insurance intermediaries. These intermediaries have an authority structure as standard practice where agents have to refer larger claims to QA managers and the QA managers refer their larger cases to CIEL Managing Director;
- CIEL also has schemes where claims handling is outsourced to a TPA up to certain limits. Claims above these limits will also refer to the CIEL Managing Director;
- Given the diversity of average claim sizes of our products, these limits may need to differ by product; and
- The thresholds are reviewed annually to ensure they remain proportional for the risk and claims activity of CIEL schemes.

Review / Adequacy of Systems of Governance

The Board of Directors of CIEL are satisfied that the systems of governance in place are appropriate given the Company's risk profile and commensurate with the nature, scale, and complexity of its operations.

There has been no material change to the underlying System of Governance of the Company since incorporation, other than the insourcing of the Actuarial Function Holder, and the establishment of the Risk and Compliance Committee and the Audit Committee as Board Delegated Committees.

B. System of Governance

B.2 Fit and Proper Requirements

It is the Company's policy to conduct all of its business in an honest and ethical manner that is compliant with law and regulation. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to ensure the law and regulation surrounding fitness and propriety are respected.

Solvency II requires that senior management meet appropriate fitness and propriety requirements. In addition, it identifies those heading up Internal Audit, Risk Management, Compliance and Actuarial as being specific roles that need to meet appropriate fitness and propriety requirements. Article 273 of the Solvency II Directive sets out:

- Insurance undertakings shall establish, implement, and maintain documented policies and adequate procedures to ensure that all persons who effectively run the undertaking or have other key functions are at all times fit and proper within the meaning of Article 42 of Directive 2009/138/EC.
- The assessment of whether a person is fit shall include an assessment of the person's professional and formal qualifications, knowledge and relevant experience within the insurance sector, other financial sectors or other businesses and shall take into account the respective duties allocated to that person and, where relevant, the insurance, financial, accounting, actuarial and management skills of the person.
- The assessment of whether members of the administrative, management or supervisory body are fit shall take account of the respective duties allocated to individual members to ensure appropriate diversity of qualifications, knowledge, and relevant experience to ensure that the undertaking is managed and overseen in a professional manner.
- The assessment of whether a person is proper shall include an assessment of that person's honesty and financial soundness based on evidence regarding their character, personal behaviour and business conduct including any criminal, financial and supervisory aspects relevant for the purposes of the assessment.
- This includes people such as Directors, Auditors and Actuaries appointed. Employees performing their duties within the insurance sector are subject to scrutiny by regulators and are expected to exercise high standards of conduct and to undertake their respective roles in a fit and proper manner.
- Prior to recruitment, directors, senior managers, and individuals performing controlled and/or certified functions are subject to general checks using the following sources of information to ensure that they are fit and proper:
 - Curriculum Vitae ("CV") and employment application forms.
 - Interviews with the candidate.
 - The applicant's input to the Malta Regulator's relevant application form.
 - References and other information provided by current and previous employers.
 - Professional and technical associations and other public bodies.
 - Internal records of Collinson (in relation to existing staff).
 - Credit reference checks, as applicable; and
 - Police conduct checks.

Individuals are also required to declare any information which may impact their ability to perform their role, conflicts of interest or any criminal or civil proceedings. The checks are repeated on an at least annual basis or when relevant circumstances or requirements change. All Directors, Executive Committee members and other persons holding a position subject to regulatory approval are required to complete a Conflicts of Interest checklist annually. Any Conflicts of Interest are required to be declared to Compliance, in accordance with the Conflicts of Interest Policy.

B. System of Governance

B.3 Risk management system including the Own Risk & Solvency Assessment

CIEL has established and embedded a consistent risk management framework, supported by appropriate Board policies and procedures to manage the key risks to the business. Where relevant, policies and procedures have been aligned to the current regulatory requirements under the Solvency II (“SII”) regime. A key part of CIEL Risk Management Framework is the way the business collectively manages, controls and reports risk at every stage throughout its governance structure. The governance framework is based upon the “three lines of defence” operating model and seeks to provide a formal and robust structure to enable risks to be identified, assessed, controlled, and mitigated; reported and monitored.

Risk Management Function

The Risk Management Function of CIEL is responsible for the operational coordination and application of all Risk Management activities throughout CIEL on an ongoing basis.

The Risk Management Function reports directly to the RCC on a quarterly basis or upon occurrence of an event which could materially impact CIEL’s risk profile.

The Function is responsible for coordination of all risk management activities throughout CIEL. The Function is also responsible for providing the Board with assistance and support in development and implementation of the various risk management arrangements within CIEL.

The Board has outsourced the activities of the Risk Function to Willis Towers Watson Management (Malta) Limited in accordance with the CIEL’s Outsourcing Policy.

Risk Management Framework

CIEL has established a risk management framework, supported by a Risk Strategy, Risk Appetite Framework and Board policies, to manage the risks faced by the business. All components of the risk management framework are shown in the illustration below highlighting how each component interacts with another.



B. System of Governance

Risk Strategy

The Risk Strategy defines the guiding principles with which CIEL operates to deliver effective risk management in support of its commercial performance and intended customer outcomes. Twenty-one principles have been defined, centred on five themes which provide a coherent structure to articulate the strategic approach to risk management:

(1) People & Culture, (2) Customers, (3) Data & Systems, (4) Processes & Delivery, and (5) Prudential

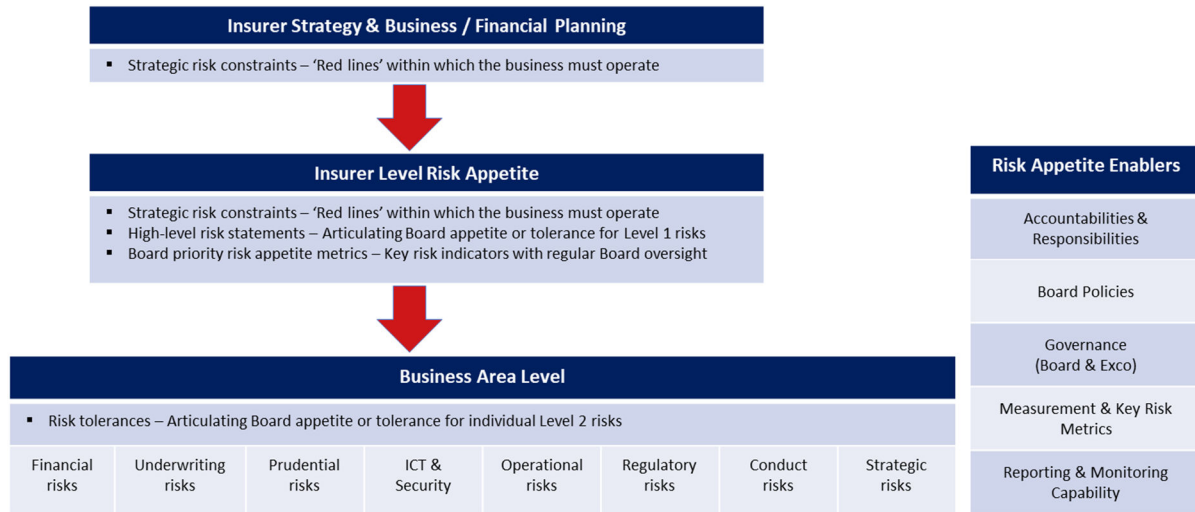
People & Culture	<ul style="list-style-type: none"> ▪ Accountabilities led approach (with the Senior Manager Regime embedded from inception) ▪ Three Lines of Defence operating model (with clearly defined roles & responsibilities) ▪ Strong emphasis on professional conduct (i.e. 'Do the right thing') ▪ Culture of effective risk management (i.e. risk identification, escalation, mitigation, awareness & learning from events)
Customers	<ul style="list-style-type: none"> ▪ Responsible Insurer & relationship led business partner ▪ Safe & secure guardian of customer data & assets ▪ Fair treatment of new & existing customers (with a strong outcomes focused ethos) ▪ Sensitive & flexible approach to treating customers fairly
Data & Systems	<ul style="list-style-type: none"> ▪ Data led strategy for decision-making & customer relationship management ▪ Automate rather than rely on manual intervention (with preventative controls where practical) ▪ Buy before Build – prioritise the use of 'tried and tested' technologies from well-established providers ▪ "Robust" operational resilience for systems, business processes & controls
Processes & Delivery	<ul style="list-style-type: none"> ▪ Integrated risk & control framework ▪ Robust selection & oversight of Outsource Service Providers & suppliers ▪ Robust change management processes ▪ Timely remediation (i.e. 'We'll put things right if things have gone wrong')
Prudential	<ul style="list-style-type: none"> ▪ Own funds: become self-sufficient with internal growth of own funds rather than shareholder capital injections ▪ Resilient balance sheet (i.e. capital & liquidity requirements are met under 'extreme but plausible' stresses) ▪ Stable earnings (i.e. profitability isn't volatile / unpredictable) ▪ Robust stress testing & scenario analysis ▪ Prudent approach to strategic planning & financial accounting / reporting

Risk Appetite Framework

The Risk Appetite Framework (RAF) defines CIEL's overall approach through which risk appetite is established, communicated, and monitored. It also defines the roles and responsibilities of those overseeing the implementation and monitoring of the RAF (including policies, processes, controls, and systems). The RAF is complemented by the Risk Appetite Statement (RAS), which defines the risk appetite across CIEL eight primary risk classes and the associated qualitative and quantitative risk limits, applying a two-level hierarchy (i.e., Board and Executive) to the risk limits and reporting.

B. System of Governance

The diagram summarises the interplay of risk appetite with strategy and business planning, alongside the processes for managing risk appetite and associated key enablers.



The appetite for risk is aligned to the Business Strategy to ensure that key risks are identified, and suitable mitigating controls are implemented and monitored. The risk appetite statement is agreed and reviewed at least annually by the Board and earlier in case of material change in risk profile or strategy. A monitoring programme of risk appetite metrics supporting management in ensuring that CIEL remains within its risk appetite.

CIEL follows a ‘three lines operating model’ for risk management. This approach is predicated on ‘the business’ (Line 1) having effective risk management processes in place, coupled with the effective design, implementation, and operation of effective controls.

The Risk function (Line 2) provides strategic oversight and challenge, whilst also enabling robust risk management by providing advice, Policies, guidance, and tools to aid Line 1’s risk activities. Internal Audit (‘Line 3’) provide independent oversight and assurance on the effectiveness of Line 1 and Line 2 risk management.

The table below highlights the different roles and responsibilities for key risk management processes:

‘The business’ (Line 1)	Risk (Line 2)	Internal Audit (Line 3)
(1) Risk Identification <ul style="list-style-type: none"> Proactively escalate risks & issues to relevant line managers Proactively escalate potential breaches to line managers & Risk Maintain business team’s Risk & Control Self-Assessments 	(1) Risk Identification <ul style="list-style-type: none"> Maintain the Risk Universe (a shared vocabulary for ‘show on the road’ risk categories & definitions) Maintain the Strategic Risk Radar (a ‘top-down’ tool for key risks) Challenge Executive team re. incoming / ‘horizon’ risks 	(1) Risk Identification <ul style="list-style-type: none"> Provide independent oversight & assurance on effectiveness of Line 1 & 2 risk identification activities
(2) Risk Assessment <ul style="list-style-type: none"> Apply the 5x5 Risk Matrix when performing Self-Assessments Assess materiality of risks & issues when determining next steps Ensure the business stays within the Board’s Risk Appetite 	(2) Risk Assessment <ul style="list-style-type: none"> Responsible for the Board’s Risk Appetite Statement Maintain the 5x5 Risk Matrix for assessing business areas risks Maintain the Risk & Control Self-Assessment methodology & tools 	(2) Risk Assessment <ul style="list-style-type: none"> Provide independent oversight & assurance on effectiveness of Line 1 & 2 risk assessment activities

B. System of Governance

‘The business’ (Line 1)	Risk (Line 2)	Internal Audit (Line 3)
(3) Risk Management <ul style="list-style-type: none"> Implement effective risk mitigation processes (ideally using a mix of preventative & detective controls) Implement effective actions if a risk is outside of risk appetite Maintain robust regulatory & Policy gap analyses Proactively confirm the effective execution of key controls 	(3) Risk Management <ul style="list-style-type: none"> Provide advice & guidance on risk management solutions / approaches Provide independent oversight of Line 1 risk management (e.g., via Compliance Monitoring work, Scenario analysis, etc.) Deliver a rolling programme of Compliance Monitoring Support the Underwriting Control Framework 	(3) Risk Management <ul style="list-style-type: none"> Provide independent oversight & assurance on effectiveness of Line 1 & 2 risk management activities
(4) Risk Reporting <ul style="list-style-type: none"> Support regular reporting of business area risk profile Proactively monitor key risk exposures (in line with Risk Appetite) 	(4) Risk Reporting <ul style="list-style-type: none"> Provide Committee & Board reporting on Risk Universe & Strategic Risks Provide independent oversight reports to Board Risk Co (e.g., Risk and Compliance Committee) 	(4) Risk Reporting <ul style="list-style-type: none"> Provide independent oversight & assurance on effectiveness of Line 1 & 2 risk reporting activities
(5) Board Policies <ul style="list-style-type: none"> Adhere to the Board’s Policy Statements & Minimum Standards Proactively request waivers / exceptions if non-compliance exists 	(5) Board Policies <ul style="list-style-type: none"> Define the Board Policy framework & document set Create Policy Statements & Minimum Standards for Insurers Maintain a register of policy waivers & exceptions 	(5) Board Policies <ul style="list-style-type: none"> Provide independent oversight & assurance on effectiveness of compliance with Board Policies
(6) Risk Culture <ul style="list-style-type: none"> Lead by example Recruit for cultural fit & support new joiners in induction activities Apply ‘common sense’ & professional judgement in personal conduct & treatment of customers Embed appropriate behaviours in teams, reinforced by responsible objective setting & performance management 	(6) Risk Culture <ul style="list-style-type: none"> Lead by example Provide new joiner training on risk management Provide a rolling programme of risk awareness ‘deep dives’ Periodically assess business team culture (e.g., via Compliance Monitoring work or in aftermath of operational incidents) 	(6) Risk Culture <ul style="list-style-type: none"> Provide independent oversight & assurance on effectiveness of risk culture activities

Own Risk and Solvency Assessment Process

The requirements of Article 45 – Own Risk and Solvency Assessment (‘ORSA’) of the Solvency II Directive 2009/138/EC of the European Parliament and of the Council require companies to have processes in place as is proportionate to the nature, scale, and complexity of the risks inherent in its business. Within their risk identification process, the Insurers seek to properly identify and assess the risks they face, in the short and long term, and to which it is or could become exposed to, whilst having processes in place which led to effective capital management.

CIEL aims to ensure that it is appropriately and prudently capitalized to accept the risk to which CIEL is exposed. In order to ensure this, CIEL will perform an ORSA at least annually and upon the occurrence of an event which may materially impact its risk profile. CIEL maintains separate policies on ORSA and Capital Management which are considered in the performance of the ORSA.

B. System of Governance

ORSA Objectives

The ORSA process supports the BoD in achieving their strategic objectives by taking a structured and combined approach of business strategy, risk management and capital management. Thus, within this context, the prime purposes of the ORSA processes are to:

- Provide the BoD and individuals involved in the decision-making processes and management with an assessment of whether risk management and solvency position are currently and prospectively adequate;
- Serve as an essential insight for any strategic decision to be made; and
- Serve as a supervisory tool by providing a detailed understanding of the evolving risk exposure, solvency position and capital planning of the CIEL to the Malta Financial Services Authority.

ORSA Timing and Frequency

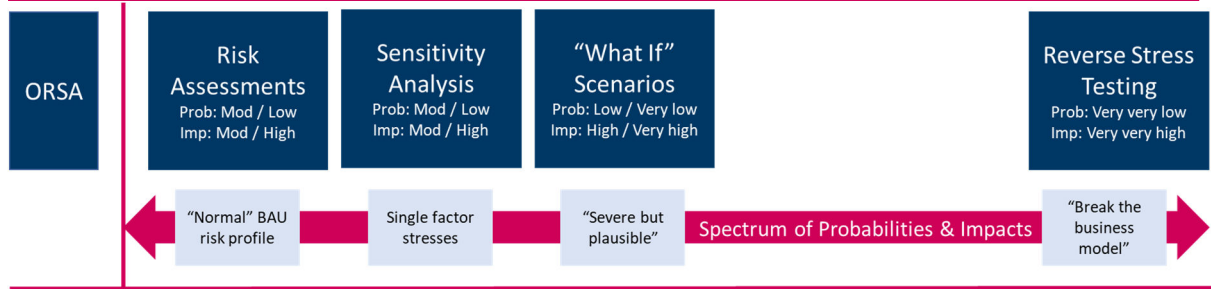
CIEL undertake an ORSA process, at least annually, to demonstrate the adequacy of the available capital, the Risk Appetite and the appropriateness of the risk limits which are assessed for the business planning period, considering the evolving risk profile. It will be re-performed on an additional ‘ad hoc’ basis in the event of significant change in the risk profile or business plans. Depending on the trigger and initial impact assessment, either a full or a partial ORSA (focused on the triggering event whilst keeping other variables constant) will be conducted.

The diagram below depicts the ORSA process that the Group has embedded within the Insurers:



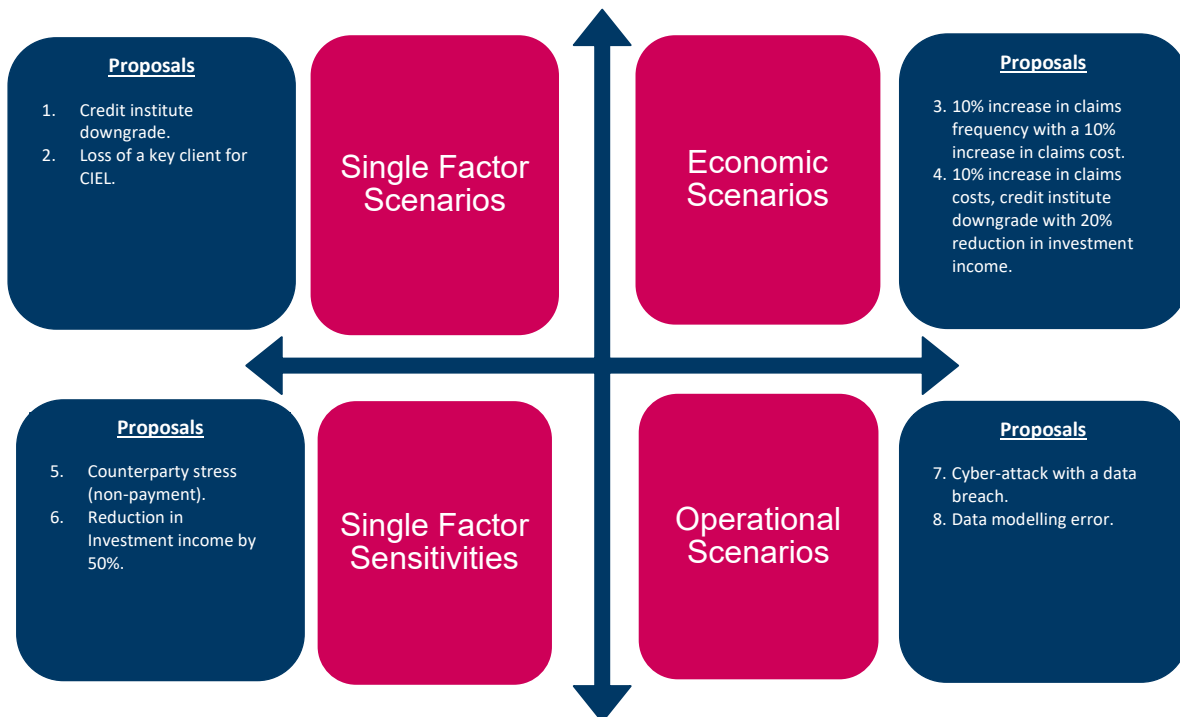
An integral element of CIEL’s risk management framework (included with the ORSA) is the stress and scenario testing of the business model and its key assumptions through sensitivity analysis and ‘extreme but plausible’ scenarios.

B. System of Governance



- **ORSA:** Identifies the Company’s capital requirements in delivering the business strategy and includes in ‘extreme but plausible’ stress scenarios and forecasts the adequacy of its capital holdings against these requirements.
- **Stress tests:** These generally assess the impact of a change in a single risk factor. Tests were performed that included both negative and positive results on the 3-year forecast view of SCR.
- **Scenario tests:** These assess the impact of a change in the overall operating environment resulting from a range of factors or a ‘shock’. The tests are considered relevant to CIEL’s underwriting portfolio and operating model.
- **Reverse Stress tests:** These assess the scenarios and circumstances that would render CIEL’s business model unviable and encourages management to identify pre-emptive measures that would be applied in such scenarios.

A range of stress and scenario testing, which is “severe but plausible”, was applied to CIEL’s Base Case Capital model to understand the impact of these sensitivities. The visual below depicts the types of scenario analysis that have been assessed as part of the ORSA process.



Own Solvency Needs Assessment

CIEL primarily considers whether the risks of the Company are adequately captured by the Standard Formula. The use of the standard formula is embedded within the decision-making processes as a capital calculator is used to assess the impact of planned decisions to support the approval process. This is used within the product governance process to ensure that CIEL has the required capital to support the new product. It is used to evaluate the impact of pricing decisions including the expected outcomes of these decisions.

B. System of Governance

The Board, with assistance from the Actuarial, Finance and Risk functions, has assessed the projected SCR for the planning period against the risks that CIEL face to determine the Own Solvency Needs. The assessment has concluded that the Own Solvency Needs for CIEL are aligned to the SCR calculations and does not attract any additional capital charges.

B.4 Internal Control System

Internal control is defined as a process determined by an organisation's structure, work and authority flows, risk profile, people, and management information systems, designed to help the organisation accomplish specific goals or objectives. The purpose of an internal control system is to have in place a coherent, comprehensive, and continuous set of mechanisms which are designed to secure the following:

- Effectiveness and efficiency of the undertaking's operations, leading to improved performance and error reduction;
- Alignment of the Company's activities with its business objectives by ensuring resources are correctly and prudently allocated;
- Safeguarding of the Company's physical and monetary assets against error, fraud, theft and unauthorised use, acquisition, or disposal, by quick identification and systemic prevention of, and formal responses to, these activities;
- Availability, reliability, and accuracy of financial and non-financial information, ensuring proper financial reporting, by maintaining accurate and complete records required by legislation, regulation, the Board, and the Company;
- Provision of timely and accurate management information critical to sound management practices and decision making;
- Compliance with applicable laws, regulations, and administrative provisions; and
- Reduction of exposure to risks by minimising the chance of unexpected events.

To support a robust internal control system a suite of governance policies has been implemented to ensure the strategy and objectives of the Company are achieved. All relevant personnel and service providers are made aware of these policies where applicable to support the internal control environment.

The Internal Control System within CIEL is depicted within the other sections of section B – System of Governance with key function holders appointed to Actuarial (B6), Compliance, Internal Audit (B5) and Risk Management (B3) and are detailed in the relevant sections. Compliance is detailed below.

Compliance Function

The Compliance Function is an independent function giving guidance and coordinating the efforts and activities of the Company as they relate to regulatory compliance. The Compliance function seeks to foster a culture of compliance; to facilitate compliance and to provide a quality assurance role to the Board as to the state of affairs of its businesses in relation to regulatory compliance. The Compliance team aims to provide assurance to the RCC and the Board that the Company conducts business in accordance with all relevant laws and regulations; internal compliance policies and ethical standards. The key responsibilities of the Compliance role are to:

- Ensure relevant and appropriate compliance training is provided for employees and the Board;
- Provide reasonable assurance that the business and its Tied Insurance Intermediaries (TIIs) are aware of and comply with the relevant laws, rules, regulations, and standards in Malta;
- Ensure appropriate and proportionate risk-based systems and controls are in place to support compliance with relevant laws, rules, regulations, and standards in Malta;
- Assist in the design, formulation and amendment of new and existing policies and procedures, products, services and the approval of marketing and advertising material;
- Provide a level of co-ordination and interaction with the relevant external bodies, including regulators, external auditors and external compliance consultants on all relevant issues and matters;
- Ensure that the business keeps pace with regulatory change by performing frequent horizon scanning, engaging with stakeholders to assess impact, communicating incoming change to relevant parts of the business, supporting with reg change projects and tracking and reporting on the status of project deliverables;

B. System of Governance

- Provide regulatory advice to help support and enable new and existing business arrangements;
- Ensure regulatory reporting is accurate and submitted on time; and
- Coordinating and managing all communications with regulators.

The activities of the Compliance team are detailed in the Compliance Plan, which is supplemented by a Compliance Audit plan, both of which are approved annually by the RCC. The purpose of the Compliance Plan is to identify and communicate the areas of focus for the current financial year in accordance with business objectives, key risks, and areas of regulatory development. The Compliance Audit Plan identifies the risk-based reviews and assessments of clients and third parties and internal reviews of systems and controls. The Compliance team monitors incidents and breaches notifying to the MFSA where required. The Compliance team also helps the business understand and prepare for future changes to relevant regulatory requirements. This includes assessing the potential risk / impact to the business, whether existing business processes operate in a compliant manner and communicating the impact of the regulations and associated actions to the relevant parts of the business.

Responsibilities of all employees / service providers:

- Being conscientious in seeking to comply with relevant obligations in the course of their duties;
- Completing mandatory compliance training as per the approved timescales;
- Ensuring compliance with any changes to regulatory policies and procedures;
- Involving the Compliance Function in new business initiatives and new products;
- Following the current policy and procedures with regard to complaints and potential rule breaches;
- Ensuring employees act within the fit and proper person requirements;
- Coordinating any discussions or meetings with regulators via the Compliance Function; and
- Asking for guidance on any Compliance queries or concerns.

B.5 Internal Audit Function

The Internal Audit function is an independent assurance function, which examines and evaluates the functioning of internal controls and governance within the control environment. It objectively examines, evaluates, and reports on the adequacy of the control environment in relation to compliance with documented policies and procedures.

An appropriate control environment is fundamental to ensuring that staff behaviour is consistent with governance and regulatory requirements, and it relies on senior management promoting the appropriate top-down culture.

The Function forms the Company's third line of defence. It operates in accordance with The Institute of Internal Auditors' mandatory guidance including The Definition of Internal Auditing, the Code of Ethics, and the International Standards for the Professional Practice of Internal Auditing.

Internal Audit is governed by an Internal Audit Charter that defines the role, level of professionalism, authority, structure, independence and objectivity and responsibility of the function. The charter is reviewed and approved by the Audit Committee (AC) on an at least annual basis. The Function reports into the Audit Committee, which is chaired by an Independent Non-Executive Director. This reporting structure delivers independence to Internal Audit in line with the provisions of the Insurance Business Rules.

The Internal Audit Function creates an Internal Audit Plan on a bi-annual basis following a risk assessment process which includes:

- A review of the risk register;
- Consideration of functions/operations impacted by recent or upcoming changes;
- Interviews with key senior management across the different functions; and
- Consideration of regulatory guidance, circulars or newsletters and industry risk analysis reports issued.

The Internal Audit Plan is frequently evaluated to determine that it is relevant and appropriate, in particular to changes that significantly impact the business environment such as changes in management strategies, external conditions, major risk areas, or revised expectations in respect of achieving the business objectives. The CIEL Audit Committee reviews and approves the Internal Audit Plan.

B. System of Governance

Internal Audit activity evaluates the management and governance oversight covering key risks and the design and operating effectiveness of key controls. The output of each internal audit engagement is an audit report covering the overall audit opinion, key observations covering control failing or identified weaknesses and their potential impact, and the actions and timings which management have agreed to remediate.

B.6 Actuarial Function

The Actuarial Function is responsible for providing insightful actuarial analysis to contribute to the business's success, whilst fulfilling regulatory responsibilities and ensuring policyholders' interests are protected.

The Actuarial Function is a critical function of the Company, having a significant impact on pricing, reserving and capital. It is a key contributor to the effective control management of insurance risks relating to the failure of pricing, risks relating to the failure of product or strategy and risks relating to adverse reserve development.

The Company has an in-house Actuarial Function Holder (AFH), whilst the Actuarial team which completes the IFRS Reserving, Solvency II Technical Provisions ("TP's") and Solvency Capital Requirement calculations is outsourced via CISEL.

The Actuarial Function produces an annual Actuarial Function Report ("AFR") to set out:

- the assessment of the reliability and adequacy of technical provisions;
- the opinion on the underwriting policy; and
- the opinion on the overall reinsurance arrangements.

The AFR and the recommendations of the Actuarial Function Holder are presented to the Board, and the progress of actions is tracked and reported to the relevant Committee(s).

B.7 Outsourcing

The Company only enters into outsourcing arrangements with service providers who have adequate financial, human, capital, and systems resources to take on the activities outsourced to them. The Company will assess that the provider is financially sound and has the relevant knowledge and experience of the service it is contracted to supply. The outsourcing of critical and/or important operational functions or activities has not been undertaken in a way that has led to any of the following:

- Materially impair the quality of the system of governance of the Group;
- Unduly increasing the exposure to Operational Risk;
- Impairing the ability of the supervising authorities to monitor the compliance of the Company with its obligations; and
- Undermining continuous and satisfactory service to policyholders.

The Company remains fully responsible for all outsourced functions and activities it needs to include in its risk management systems and controls for monitoring and reviewing the quality of the service provided. It is not sufficient for the service provider itself to have internal controls and a risk management system that covers the services performed. In order to ensure effective control of outsourced activities and manage the risks associated with the outsourcing, the Company maintains the competence and ability to assess whether the outsourcing provider delivers according to contract.

The Company has an intra-group agreement with Collinson Insurance Solutions Europe Limited ("CISEL") for arranging claims handling, IT, Finance, Underwriting, HR services and other administration support.

The following critical or important operational functions have been outsourced by the Company:

- Claims Handling for some products.
- Supplier Hosted Data Storage and Application Services (e.g., Cloud Computing).
- Medical Assistance case management.
- Back-office services such as IT, HR, Facilities.

B. System of Governance

- Distribution, sales, and complaint handling for some products.

A summary of the key outsourced arrangements currently in place are as follows:

- Claims handling activities for Dental Insurance written in Norway and Sweden which are performed by Norsk (registered in Norway);
- Claims handling activities for CDW and Travel Insurance which are performed by Cover Genius (registered in Netherlands);
- Claims handling activities for Ticket Cancellation and Gadget Insurance which are performed by AGS Pier GmbH (registered in Germany)
- Claims handling activities for CDW which are performed by Eversure Cell of Jatco Insurance Broker PCC Ltd. (registered in Malta)
- As indicated above, a service agreement for insurance administration services with CISEL (registered in Malta); and
- An Insurance Management Agreement with Willis Towers Watson Management (Malta) Limited (registered in Malta).

The arrangements detailed above are reviewed regularly to ensure outsourcing risks are mitigated and that quality of service is maintained in line with the Outsourcing & Third-Party Management Policy.

B.8 Any other information

The BoD does not consider that there is any further information which should be disclosed.

C. Risk Profile

C. Risk Profile

CIEL operates a business model that is supported by a robust risk management framework that ensures risks are well understood and controlled. This is facilitated by systematic quantification of all risks and a culture that promotes the importance of risk management.

Integral to this is a thorough understanding and articulation of CIEL's risk exposures. Determining the prevailing risk landscape within CIEL allows Management, the Risk Function, and the Board to assess the appetite for each emerging risk and to ensure that all are quantifiable and managed consistently with our appetite to risk.

The Directors have considered that the Parent does not add any material operational risk to the Group since it carries out no activities and hold minimal cash at bank. However, the strategic participation which the Parent holds in CISEL adds material market risk exposure and increases the own funds of the Group significantly. This section provides the necessary information related to the risk profile of CIEL, with any additional risks related to the Group shown as a comparison.

The table below provides a breakdown of the components of CIEL Solvency Capital Requirement (SCR) as at 30 April 2024:

Solvency Capital Requirement	FY24 €'000	FY23 €'000	Movement €'000
Non-Life Underwriting	3,095	2,041	1,054
Health Underwriting	2,624	1,819	805
Market Risk	1,743	781	962
Counterparty Default	435	836	(401)
Undiversified BSCR	7,897	5,477	2,420
Diversification	(2,703)	(1,860)	(843)
Base SCR	5,194	3,617	1,577
Operational Risk	1,558	1,085	473
Solvency Capital Requirement	6,752	4,702	2,050
Company's Own Funds to cover the SCR	15,121	9,683	5,438
SCR Coverage Ratio	224%	206%	18%

The table below provides a breakdown of the components of CHEL Solvency Capital Requirement (SCR) as at 30 April 2024:

Solvency Capital Requirement	FY24 €'000	FY23 €'000	Movement €'000
Non-Life Underwriting	3,095	2,041	1,054
Health Underwriting	2,624	1,819	805
Market Risk	2,187	1,235	952
Counterparty Default	435	836	(401)
Undiversified BSCR	8,341	5,931	2,410
Diversification	(2,856)	(2,050)	(806)
Base SCR	5,485	3,881	1,604
Operational Risk	1,646	1,164	482
Group Solvency Capital Requirement	7,131	5,045	2,086
Group's Own Funds to cover the SCR	17,992	13,025	4,967
Group SCR Coverage Ratio	252%	258%	(6%)

C. Risk Profile

The main movements in the SCR of the Company from 30 April 2023 is due to the following reasons:

- Non-Life and Health Underwriting risk has increased mainly due to an increase in forecast business volumes as well as a lower level of quota share reinsurance, both of which have increased the premium and reserve risk. The lapse risk has also increased due to higher expected profits in future premium.
- Market risk has increased largely as a result of increased Interest Rate risk and Spread risk, due to higher assets under management and an increase in the mismatch between the duration of the assets and liabilities.
- Counterparty Default risk has reduced due to lower quota share recoveries on the funds transferred reinsurance and cash at bank reducing (due to more funds being transferred to the money market fund where it earns a higher return).
- Operational risk has increased due to it being capped at 30% of the Basic SCR (i.e. it has increased in line with the increases in the Basic SCR).

The Eligible Own Funds have increased over the financial year due to profit on the retained earned premium; investment returns; and a one-off reduction in Technical Provisions due to changes in the methodology used to calculate expenses and the cashflow profile used to calculate the discounting benefit.

At the level of the Group, the movement can be explained by the following additional reasons:

- The market risk for the Group, has also increased due to the increases for the Company, although this has been offset slightly by a lower net asset value of CISEL, which has decreased the equity risk from this strategic participation.
- In addition, the Group's Own Funds to cover the SCR, has increased from last year due to the higher Own Funds of the Company.

An overview of the key risks associated with the business including an outline of how they are managed is provided below.

C.1 Underwriting Risk

Underwriting risk arises from the volume of business the Company underwrites, inadequacies in pricing, compared to the product benefits, or worse than expected claims experience. Most of the underwriting risk to which CIEL is exposed is of a short-term nature in view of the lines of business which it writes. CIEL has a diverse portfolio of business across different product lines ensuring that it is not reliant on the performance of one line of business.

The table below shows the Underwriting Risk charge for year ending 30 April 2024 and percentage of the undiversified Basic SCR with a comparison with the previous financial year. The standard formula was considered an appropriate proxy for Underwriting risk as it applies a risk charge based on the different lines of business allowing for catastrophes and lapses.

Underwriting Risk – CHEL	FY24		FY23		Movement	
	€'000	BSCR %	€'000	BSCR %	€'000	BSCR %
Non-life Underwriting risk	3,095	37%	2,041	34%	1,054	3%
Health Underwriting Risk	2,624	31%	1,819	31%	805	-
Total Underwriting Risk	5,719	68%	3,860	65%	1,859	3%

C. Risk Profile

Underwriting risk is mitigated by:

- Single source performance information produced on a regular basis, feeding into the underwriting and management processes, and informing decision making. CIEL has also invested in improvements to the analytical processes – including new reserving processes and underwriting management information and pricing models.
- CIEL is a specialist insurer focusing on Travel, Health, and ancillary personal lines insurance products. As well as pricing, CIEL has additional controls to segment the market and target those risks it wishes to underwrite in close cooperation with its key affinity partners.
- Reinsurance contracts, both quota share and excess of loss, reduce exposure to large individual claims or aggregated losses from a single event and dampen the volatility in the underwriting result.
- A quarterly review of reserving loss ratios is undertaken, which sets the IFRS reserves. This is done by projecting claims to an ultimate position using underwriting year triangles. Back testing of recent experience against the expected premiums and claims emergence is performed between Reserving Committees where the analysis is challenged prior to sign off and booking. As the Solvency II Best Estimate Technical Provisions (TP's) consist of Premium Provisions, Claims Provisions and Risk Margin, the booked IFRS reserves form an input into the Company's Solvency II Best Estimate TP's Model.
- Underwriting Governance processes including the Deal rooms pay particular attention to how much Underwriting Risk Capital is being consumed by the product or scheme under review and includes comparison of the scheme risk capital to the available capital headroom. Return on Capital calculations drive underwriting focus towards items which deliver an appropriate return on capital.

Underwriting risk is monitored by:

CIEL has a Board approved risk appetite statement that includes the monitoring of the Underwriting metrics, which are monitored within appropriate governance forums. This monitoring provides assurance that CIEL is ultimately operating within the Board approved risk appetite and remains within the budgeted capital plan.

C.2 Market Risk

Market risk arises from fluctuations in the market value of, or income from, CIEL assets. CIEL has invested its assets in Money Market Funds. This allows CIEL to gain a reasonable return on its available assets to support the operations, while also ensuring adherence to the prudent person principle and adequate liquidity since such investments are callable within 1 days' notice.

CIEL has exposure to the following types of market risk:

- Currency risk – CIEL is exposed to currency risk in respect of liabilities under policies of insurance and reinsurance contracts denominated in currencies other than Euro. CIEL manages its foreign exchange risk against its functional currency. Foreign exchange exposure arises when there is a mismatch in the value of the foreign currency assets and liabilities.
- Interest rate risk – CIEL is exposed to interest rates in respect of duration of liabilities and assets mismatching with each other under different currencies. CIEL manages its exposure to interest rate risk via quarterly Finance and Investment working group meetings to ensure the risk charge of interest rate risk within its risk appetite.
- Spread risk and concentration risk – CIEL is exposed to spread, and concentration risk originated from its investment portfolio.

Due to the simple structure of investment portfolio, the standard formula is deemed to be an adequate proxy given the size and complexity of CIEL's market risk exposure. Cash exposures are considered within the Counterparty Risk module.

C. Risk Profile

The table below shows the Market Risk charge for year ending 30 April 2024 and percentage of the undiversified base SCR with a comparison to the previous financial year.

	FY24		FY23		Movement	
	€'000	BSCR %	€'000	BSCR %	€'000	BSCR %
CIEL Market risk	1,743	22%	781	14%	962	8%
CHEL Market risk	2,187	26%	1,235	21%	952	5%

CIEL does not use derivative instruments to manage exposure to foreign currencies, instead its ongoing monitoring of non-Euro asset and liability exposure and rebalancing any surplus / deficit positions allows CIEL to control currency exposure.

CIEL's investments are exclusively in money market funds. All Investments and cash and cash equivalents are ordinarily available within 24 hours thereby reducing the Groups liquidity exposure including under any stressed scenarios.

The Group is further exposed to market risk in the form of its investment in Collinson Insurance Solutions Europe Limited. CISEL is classified as a strategic participation of the Group and attracts market risk under the Solvency II standard formula. The Group manages this risk as explained in Section C.6 under "Group risk".

Prudent person principle

CIEL is required, and strictly follows, the prudent person principle to invest the assets used to cover its' respective MCRs and SCRs. The prudent person principle defines that the assets must be invested in a manner that a 'prudent person' would – that is that the decisions are generally accepted as being sound for the average person.

Market Risk is mitigated by:

- The Investment Strategy defines the currencies in which underlying investment assets may be held.
- Surplus currency bank and cash positions are monitored and rebalanced by the finance function when any surplus or deficit positions arise.
- The Finance and Investment Working Group monitors the level of CIEL's exposure to foreign currency against risk appetite and the approved business plan.
- The Finance and Investment Working Group also monitors the level of CIEL's exposure to asset liability mismatching against risk appetite and the approved business plan.
- The overall level of current and forecast exposure to foreign currencies across the CIEL balance sheet and the impact this has, or may have, on the regulatory capital of CIEL is monitored by the Risk and Compliance Committee (RCC).
- CIEL does not currently use derivatives to manage currency exposure.
- The banks used by CIEL currently have a credit rating of A or higher, with the exception of a local bank which is CRD IV compliant.
- The amount of cash held by CIEL is also monitored and ensured to be within the limit approved in the business plan.

Market risk is monitored by:

Regular monitoring of cash balances and concentration limits is managed by the Operational Cash Management team reporting to the Board. This assists with remaining within risk appetite and acts as an early warning to potential stress events. CIEL has a Board approved risk appetite statement that includes the monitoring of the Market, Investment and Liquidity risk metrics, which are monitored within appropriate governance forums. This monitoring provides assurance that CIEL is ultimately operating within the Board approved risk appetite and remains within the budgeted capital plan.

C. Risk Profile

C.3 Credit Risk

Credit risk is the risk that a counterparty will be unable to pay amounts in full when due. Key areas where CIEL is exposed to credit risk are:

- Reinsurer’s share of insurance liabilities;
- Amounts due from reinsurers in respect of claims already paid;
- Amounts due from policyholders;
- Amounts due from insurance intermediaries; and
- Cash held with banks.

CIEL’s exposure to counterparty risk arises from exposure to reinsurers in respect of reinsurance assets representing recovery reserves, and banks in respect of policyholder’s operational cash balances and debtors from the distributors who sell policies on behalf of CIEL.

CIEL’s current and forward-looking policy over the period of its three-year plan is to place business with reinsurers with an external credit rating of “A” or above, and to bank with and place deposits with institutions with an external credit rating of “A” or above, with the exception of HSBC Malta which is CRD IV compliant and part of the HSBC Group which is A rated.

The table below shows the Counterparty Risk charge for year ending 30 April 2024 and percentage of the undiversified base SCR with a comparison with the previous financial year.

	FY24		FY23		Movement	
	€'000	BSCR %	€'000	BSCR %	€'000	BSCR %
CIEL Counterparty risk	435	6%	836	15%	(401)	(9%)
CHEL Counterparty risk	435	5%	836	14%	(401)	(9%)

CHEL’s counterparty risk includes additional cash at bank which is not included in CIEL. The amount of cash at bank held by CHEL was immaterial in FY 24.

Credit Risk is mitigated by:

- CIEL manages the level of credit risk it accepts by placing limits on its exposure to a single counterparty, or groups of counterparties, and to geographical and industry segments. Such risks are subject to regular review.
- CIEL has a minimum reinsurer credit agency rating (A.M. Best) appetite of A, with its principal Quota Share reinsurer having a rating of A+.
- The Excess of Loss reinsurance panel comprises of reinsurers with a minimum credit rating of A. The panel is composed primarily of Lloyd’s reinsurers.
- The Board Policy is to maintain intercompany debt with other Collinson entities at a minimum, thereby reducing CIEL’s counterparty credit exposure.
- Exposure to credit risk in respect of amounts due from policyholders is mitigated by CIEL’s large customer base and the low average level of balances outstanding. The Company is not exposed to concentrations of credit risk in respect of policyholders.
- The Risk & Compliance Committee meets on a quarterly basis and is responsible for monitoring these risks remain within risk appetite.

Credit exposure

Information on CIEL’s credit risk exposures can be found in Note 6.2.4 in the Audited Financial Statements of CIEL.

C. Risk Profile

Impaired financial assets

For assets to be classified as 'past-due and impaired' contractual payments must be in arrears for more than 90 days. During the year ended 30 April 2024, an amount of €50k (2023: €109k) due from an insurance intermediary has been provided for as bad debt.

Counterparty risk is monitored by:

Regular monitoring of cash balances and concentration limits is managed by the Operational Cash Management team reporting to the Finance Leadership Team. This team assists with ensuring CIEL remains within risk appetite and act as an early warning to potential stress events. CIEL has a Board approved risk appetite statement that includes the monitoring of the Credit Risk (including counterparty) risk metrics, which are monitored within appropriate governance forums. This monitoring provides assurance that CIEL is ultimately operating within the Board approved risk appetite and remaining within the budgeted capital plan.

C.4 Liquidity Risk

Liquidity risk is the risk that CIEL although solvent or profitable, either does not have available sufficient financial resources to enable it to meet its obligations as they fall due or can secure such resources only at excessive cost.

Liquidity risk is not explicitly included within the standard formula SCR calculation and is not considered a material risk to the Company as the assets to support its risks and capital requirements are held in Money Market Funds or cash deposits with banks with a current credit rating of A or higher. The Company considers the composition of its assets in terms of their nature and liquidity to be appropriate and sufficient to meet its obligations as they fall due.

The Company manages the level of liquidity risk through:

- Liquidity and Asset Liability Management Policies in place;
- Monthly cash forecast;
- Monthly report of cash and liquid balances presented to the Board;
- ALM (currency) forecast on quarterly basis; and
- Set guidelines on asset allocations, portfolio limit structures and maturity profiles of assets, in order to ensure sufficient funding available to meet insurance contract obligations.

During the year ended 30 April 2024, CIEL was not exposed to significant liquidity risk.

C.5 Operational Risk

CIEL is exposed to operational risk through its operational outsourcing relationships, regulatory or legal environments and external events that affect the operation of CIEL. To operate efficiently, CIEL recognises that it needs to have a robust framework in place to manage operational risk. The framework is underpinned by an Operational Risk Policy.

The following are the Board Policy Statements that have been implemented to manage Operational Risk:

Risk Culture: The Board and Executive Management will seek to lead CIEL in delivering a strong risk management culture.

Risk Framework: The Risk function will seek to develop, implement, and maintain a risk framework and standards that align to regulatory requirements.

Risk Identification: CIEL will seek to use appropriate risk management tools to identify actual, potential, or emerging risks in all material products, activities, processes, and systems.

Risk Assessment: CIEL will seek to use appropriate risk management tools to assess risks in all material products, activities, processes, and systems to ensure that risks are properly understood.

Risk Control: CIEL will seek to use appropriate internal controls e.g., policies, processes and systems and appropriate risk mitigation and transfer strategies to manage its operational risks.

Risk Events: CIEL will seek to ensure that incidents are identified, escalated, and effectively managed within agreed parameters.

C. Risk Profile

New Product Approval: CIEL will seek to ensure that new products, material changes to existing products and associated operational implications are assessed for risk.

Risk Reporting: CIEL will seek to regularly monitor its risk profile and material exposure to losses.

Operational Resilience: CIEL will seek to maintain robust operational, cyber, and technological resilience for both its in-house processes and activities and those undertaken by its partners.

As a standard formula company, the Operational Risk SCR charge is primarily driven by premium volumes especially premium volume growth. Operational risk charge accounts for 30% of the Basic SCR in FY24, in line with the prior year. The table below shows the Operational Risk charge for year ending 30 April 2024 and percentage of the SCR with a comparison with the previous financial year.

	FY24		FY23		Movement	
	€'000	BSCR %	€'000	BSCR %	€'000	BSCR %
CIEL Operational risk	1,558	30%	1,085	30%	473	-
CHEL Operational risk	1,646	30%	1,164	30%	482	-

CIEL seeks to mitigate the risk with the implementation of a robust operational risk framework which is consistent, effective, economic, and proportionate to the nature, scale, and structure of the business. The framework is supported by an Operational Risk Policy and procedures detailing clear roles and responsibilities to support staff in undertaking their “business as usual” activities whilst managing the “day to day” operational risks.

As underwriting premium growth continues to be a key driver of Operational Risk SCR, CIEL has implemented a 3-Year Capital Planning cycle embedded in its business planning procedures. This enables identification of the level of premium growth and the level of Operational Risk SCR within risk appetite. The process has been implemented within the scheme underwriting processes and constitutes a key part of Solvency II embedding in general business activity. This monitoring provides assurance that CIEL is ultimately operating within the Board approved risk appetite and remaining within the budgeted capital plan.

C.6 Other Material Risks

Other risks that could impact the Company’s ability to meet its business plan are:

Financial risk from climate change

Financial risk from Climate Change (FRCC) is not a new risk but has received heightened regulatory focus within financial services and increased expectations for external reporting during the past few years. A key aspect is financial risks caused due to climate change, not solely the impact of climate change.

The conclusion of the assessment is that CIEL has minimal exposure to FRCC. The Board has considered that the capital charge within the Standard Formula adequately captures all the risks of the Company and does not believe an additional capital charge is required for FRCC following this assessment. The Board is confident that the robust control framework and monitoring in place reduces the probability of risks crystallising in this area and that no additional management action is considered necessary to reduce the risks further.

Strategic Risk

Strategic risk is defined as ‘failure to set and implement an appropriate strategy’, has been assessed as within CIEL’s risk appetite. To this extent, whilst not explicitly modelled, the consequences of inappropriate strategic decisions will be assessed within each risk contributing to the SCR.

C. Risk Profile

Group Risk

The Company is dependent upon on the wider Collinson Group for the provision of the following services directly associated with the sale of insurance and servicing of policy obligations.

- Underwriting and pricing
- Claims handling
- Finance, actuarial reserving, and taxation
- Policy administration
- Investment management and treasury.

The current outsourcing arrangement in respect of operating costs (non-technical in nature) is with CISEL. CISEL is the legal entity through which the Collinson Group performs managing agency business in Europe. CISEL also provides insurance administration services to CIEL.

There is a separate profit commission agreement between CIEL and CISEL covering the respective arrangements in place for the profit commission paid to CISEL for the provision of insurance administration services to CIEL. The basis of this profit commission is CIEL retain a 4.5% cost of capital fee on retained net earned business written, with the balance of underwriting profit being paid as profit commission to CISEL. (Note: The Company's forecast loss ratio over the planning period is 62% and the corridor limits are not expected to be breached).

This model means, that subject to the upper corridor limit (85.5%) not being breached, then CIEL will make a 4.5% profit before FX and interest. This is reflected in the future forecasts which show a steady profit stream and increase in own funds, within well capitalised SII funds. For CISEL, the profit commission received is variable depending on underwriting performance of the overall portfolio.

CIEL therefore has a significant inter-dependence with CISEL to enable the Company to deliver the services to its ultimate clients, including the provision of insurance administration services. CIEL works closely with CISEL to satisfy itself that it continues to have the economic and operational resources to continue to meet their obligations to the Company.

In addition, Collinson Group provides services to CISEL which indirectly support the sale of insurance and servicing of policy obligations.

- Property and infrastructure
- People and culture
- Information systems
- Data management

Collinson Group remains committed to supporting business growth of CIEL, with the Insurance Division and CIEL containing key components of the Collinson Group's strategy.

Emerging risks

CIEL's approach is to ensure such risks are identified at an early stage by using a Strategic Risk Radar to assess, record and monitor emerging risks to ensure controls are in place where required to mitigate the risk. This is regularly reviewed at the Risk and Compliance Committee.

Once an emerging risk can be assessed and more is discovered about its potential impact and likelihood, the relevant committee Chairperson is responsible for escalating this to the Risk Function for further discussion and potential inclusion within the risk register. In this way, an appropriate mitigation plan to avoid any losses can be developed.

C. Risk Profile

The Board is confident that the robust control framework and monitoring in place reduces the probability of risks crystallising in this area and that no additional management action is considered necessary to reduce the risks further.

C.7 Any other information

Group Consolidation

CIEL forms part of an insurance group which potentially adds risks outside of the normal spectrum of an insurance company. The Directors have considered that the Parent does not add any material operational risk to the Group since it carries out no activities and hold minimal cash at bank. However, the strategic participation which the Parent holds in CISEL adds material market risk exposure and increases the own funds of the Group significantly. CISEL is an insurance intermediary which carries out insurance policy administration and claims handling for the operations of the Company and also services third party underwriters and accordingly is being treated as a strategic participation when considering the requirements of Article 335 of the Solvency II Delegated Regulation and EIOPA published Q&A ID 649.

The Board does not consider that there is any further information which should be disclosed.

D. Valuation for Solvency Purposes

D. Valuation for Solvency Purposes

Assets and liabilities under Solvency II are valued in accordance with the Solvency II Directive. “The primary objective of valuation as set out in Article 75 of Directive 2009/138/EC requires an economic, market-consistent approach to the valuation of assets and liabilities. According to the risk-based approach of Solvency II, when valuing Balance Sheet items on an economic basis, undertakings need to consider the risks that arise from a particular Balance Sheet item, using assumptions that market participants would use in valuing the asset or the liability.”

The values of the assets and liabilities prepared using International Financial Reporting Standards as adopted by the EU (“IFRS”), have been used with some adjustments as outlined in the following sections. These adjustments are in line with the recommendations in the EIOPA Technical Specifications.

References to “the Regulation” in this Section are in respect of the Commission Delegated Regulations (EU) 2015/35.

D.1 Assets

The following table shows a comparison of asset figures under both Solvency II and IFRS for the Group.

Assets	Solvency II	IFRS	Movement
	€'000	€'000	€'000
Financial assets	30,644	30,558	86
Holdings in participations	2,880	2,880	-
Reinsurance contract assets		4,232	(4,232)
Reinsurance recoverables from:	2,230	-	2,230
Non-life excluding health	-	-	-
Health similar to non-life	2,230	-	2,230
Insurance and intermediaries receivables	2,054	43,739	(41,685)
Receivables (trade, not insurance)	1,296	201	1,095
Cash and cash equivalents	1,705	1,705	-
Total assets	40,809	83,315	(42,506)

A description on the valuation techniques utilised are described below:

Deferred tax asset

Deferred tax assets are valued as the difference between the assets and liabilities recognised in accordance with Solvency II and under IFRS. Deferred tax assets are only recognised on the basis that future taxable profit will be available against which the deferred tax asset can be utilised. As at 30 April 2024, the Company did not have any unrecognised temporary differences or trading losses and therefore did not recognise a deferred tax asset.

D. Valuation for Solvency Purposes

Financial assets

CIEL classifies its investments at fair value through profit and loss (FVTPL). The classification is dependent on the purpose for which the assets were acquired. The Directors determine the appropriate classification of investments at the time of purchase and re-evaluate such designation at every reporting date.

The Company's business model for managing financial assets refers to how it manages its financial assets in order to generate cash flows. The business model determines whether cash flows will result from collecting contractual cash flows, selling the financial assets, or both.

Financial assets at amortised cost are subsequently measured using the effective interest rate method and are subject to impairment. Gains and losses are recognised in other comprehensive income when the asset is derecognised, modified or impaired.

Financial assets at FVTPL as at 30 April 2024 amounted to €30,558k (2023: €20,952k). The Solvency II valuations of these financial assets are the same as the valuations required by the International Financial Reporting Standards (IFRS).

Holdings in participations

Holdings in participations were valued on the basis of the net asset value of the participation. The net asset value approximates the market value of the holdings in participations in accordance with Article 8 of the Regulation. This has been classified as a strategic participation in the SCR calculation and stressed under the equity risk module.

Reinsurance recoverables

Reinsurance recoverables are calculated using a Best Estimate concept in line with Solvency II valuation techniques as compared to IFRS which considers a case-by-case estimate at a point in time. Information on the valuation principles of the reinsurance recoverables is provided in Section D.2.

Insurance and intermediaries' receivables

The Solvency II valuation is based on the best estimate of the recoverable value, discounted to present value where the expected recovery is greater than one year. In addition, the undue insurance receivables are classified into the technical provisions and included as part of the Premium Provisions as they constitute a future cashflow. Information on the valuation principles utilised to calculate the Premium Provision are disclosed in Section D.2.

Receivables (trade, not insurance)

Receivables are calculated using IFRS valuation principles and approximate the fair value of the asset. This is in accordance with Article 8 of the Regulation. The Receivables have been stressed under the Counterparty Default Risk module.

Cash and cash equivalents

Cash and cash equivalents were valued using the market price of the asset in accordance with Article 8 of the Regulation and is consistent with the valuation approach under IFRS. These have been stressed under the counterparty default risk module. Cash at bank also includes exposures in foreign currencies which are stressed under the currency risk module within market risk.

D. Valuation for Solvency Purposes

Loss absorbing capacity of deferred tax assets under Solvency II

The value of the SCR may be reduced to allow for the loss absorbing capacity of deferred tax assets (“LACDT”). This adjustment is calculated in accordance with Article 207 of the Regulation and is equal to the change in the value of deferred taxes that would result from an instantaneous loss of an amount that is equal to the Basic SCR plus operational risk. The valuation method is in line with the “Deferred Tax Asset” under IFRS where these can only be recognised on the basis that it is probable that the Company has future tax profits which will be available against the deferred tax asset. In view of the model whereby CIEL retains a small percentage of profits, it has been considered that the LACDT impact would be immaterial and a prudent position to take no LACDT has been adopted.

D. Valuation for Solvency Purposes

D.2 Technical Provisions

The calculation of Technical Provisions (“TPs”) under Solvency II relies on similar principles to the IFRS 17 calculation of liabilities with respect to expired and unexpired risk. Both calculations use the actuarial ‘best estimate’ of liabilities and are discounted on a cashflow basis, which takes into account the time value of money. Both approaches also allow for expenses, Events Not in Data (“ENIDs”) and a risk adjustment/margin to account for the cost of holding capital.

Differences between both bases arise in the provision of expenses. IFRS 17 includes expense payables in the calculation of liabilities. Solvency II excludes expense payables but instead incorporates a provision for expenses that would be incurred in running off the business. Furthermore, Solvency II is more prescriptive on the discount rate and the methodology used for the calculation of the risk adjustment, whereas IFRS 17 is flexible and therefore may differ to the Solvency II assumptions used.

Valuation results

The valuation was carried out together for each line of business.

The table below sets out the results of the gross technical provisions under both IFRS and Solvency II basis.

Gross Technical Provisions	SII €'000	IFRS €'000	Movement €'000
Liabilities for expired risk	8,349	8,399	(50)
Liabilities for unexpired risk	2,547	45,738	(43,191)
Risk Margin	333	385	(52)
Total Gross Technical Provisions	11,229	54,522	(43,293)

The table below shows the composition of Best Estimate and Risk Margin by Solvency II Line of Business:

	Direct business and accepted proportional reinsurance					Total Non-Life obligation €'000
	Medical expense insurance €'000	Assistance €'000	Fire and other damage to property €'000	Other motor insurance €'000	Miscellaneous financial loss €'000	
Premium provisions						
Gross - Total Direct Business	(2,708)	5,372	(78)	(37)	(2)	2,547
Total recoverable from reinsurance	(2,063)	(1,906)	(33)	(98)	-	(4,100)
Net Best Estimate of Premium Provisions	(645)	7,278	(45)	62	(2)	6,647
Claims provisions						
Gross - Total Direct Business	5,313	2,731	54	252	(1)	8,349
Total recoverable from reinsurance	4,292	1,875	33	131	-	6,331
Net Best Estimate of Claims Provisions	1,021	856	21	121	(1)	2,018
Total best estimate - gross	2,605	8,103	(24)	215	(3)	10,896
Total best estimate - net	376	8,134	(24)	183	(3)	8,666
Risk margin	171	139	3	20	-	333

D. Valuation for Solvency Purposes

The value of TPs corresponds to the current amount an insurer would have to pay if it were to transfer its obligations immediately to another insurance undertaking. TPs are the sum of the best estimate liabilities (“BEL”) and the risk margin. Best estimate corresponds to the probability-weighted average of future cash flows, taking into account the time-value of money using the relevant risk-free rate term structure. The bases, methods and assumptions used for the valuation of TPs are as follows:

Calculation Basis

- Calculations are carried out on a going-concern basis;
- Insurance exposure is split into five lines of business; Medical Expenses, Assistance, Fire and other Damage to Property, Other Motor Insurance and Miscellaneous Financial Loss;
- TPs are calculated as best estimate cash flow projections of all inflows and outflows required to settle liabilities. The time horizon for the calculations is the full lifetime of liabilities that exist on the valuation date;
- Cash flows are discounted using the EIOPA basic risk-free rates (without the matching adjustment and volatility adjustment). It is assumed that, on average, cash flows occur in the middle of each month; and
- Best estimate calculations are at homogenous risk group level by scheme and scheme year and are based on up-to-date credible information and realistic assumptions. The quality and sufficiency of data underlying the calculation is compliant with SII standards.
- The Solvency II Directive regulation requires the inclusion of “run-off” expenses to be incorporated into the Solvency II calculation.

Best Estimate

- The TPs, so far as concerns this element, are on a best estimate basis, and
- The best estimate consists of a claims provision and premium provision for business on risk at the valuation date.

Claim Provisions

- The claims provisions are calculated as the discounted best estimate of all future cash flows relating to existing claims that occurred on or prior to the valuation date (i.e., claims on earned business);
The provision for claims outstanding is the underlying best estimate, as calculated within the IFRS reserves using a combination of actuarial and statistical techniques, including Chain Ladder and Bornhuetter-Ferguson techniques.

The following adjustments are made in the best estimate claims provisions:

- Allow for low probability high severity events, referred to as Events Not in Data (“ENIDs”) where applicable.
- Include SII expenses required for the run-off of reserves where applicable; and
- Discount cash flows.

D. Valuation for Solvency Purposes

The following table shows the changes between the IFRS and Solvency II Claims Provisions:

	IFRS	SII
	€'000	€'000
Liability for incurred claims	8,784	
IFRS discounting	142	
Risk Adjustment	(391)	
Reinsurance	(6,407)	
Valuation under previous accounting practices	2,128	
SII Adjustments:		
Run-off expenses allocated		4
Discount Factor		(114)
Net claims provision under Solvency II		2,018

The amount of recoverables from reinsurance contracts on the claims provision are shown as “Reinsurance Recoverables” in Section D.1. The valuation principles of reinsurance recoverables follow the same valuation principles utilised to arriving to the gross claims provision.

The following are the main differences that arise between the solvency valuation and the accounting valuation:

- the provision for the time-value for money considers only a risk-free-rate for the solvency valuation while the accounting valuation uses a risk-free-rate plus an illiquidity adjustment;
- the concept and calculation of the risk margin for the solvency valuation is different from that of the risk adjustment under the accounting valuation;
- the inclusion of expected future cash flows from business bound but not yet incepted at the reference date in the solvency valuation;
- the allocation of other directly attributable costs to the accounting valuation which are included as part of “payables (trade, not insurance)” in the solvency valuation; and
- the inclusion of events not in data for unexpired risk in the solvency valuation.

Premium Provisions

- The premium provisions are calculated as the discounted best estimate of all future cash flows relating to claims for projected future events on existing business (i.e., claims on the unearned business);
- The premium provisions also include the discounted best estimate of all future cashflows on bound but not incepted (“BBNI”) business;
- Cash flows are projected in line with all insurance obligations related to future exposure until contract boundaries, and lapses and mid-term cancellations are allowed for as per business expectations; and
- The following adjustments are made in the best estimate premium provision:
 - Allow for ENIDs;
 - Include SII expenses required for the run-off of reserves where applicable;
 - Include unpaid premium not overdue, net of provision for bad debts; and
 - Discount cash flows.

D. Valuation for Solvency Purposes

The following table shows the changes between the IFRS and Solvency II Premium Provisions:

	IFRS	SII
	€'000	€'000
Liability for remaining coverage	45,738	
Profit commissions	(14,124)	
Directly attributable expenses	535	
Reinsurance	(24,669)	
XOL	(336)	
FX on UPR/ DAC reallocated under IFRS 17	21	
Unearned premium valuation under previous accounting practices	7,165	
SII Adjustments		
ENID Loading		84
Allowance for BBNI		(887)
Profit on unearned premium		(2,730)
Premium receivable		(29,445)
Run-off expenses allocated		33,455
Discount Factor		(1,332)
Net Premium provision under Solvency II		6,647

The profit on the unearned premiums arises due to the assumed loss ratio being less than 100%.

The above approach to calculate expected claims is consistent with the Actuarial Function Report, which is provided by the Head of Actuarial Function, and which follows the roles and responsibilities laid out in Section B.7.

Risk Margin

- The Risk Margin is included as a component of the technical provisions in order to ensure that the value of total technical provisions is equivalent to the amount that another insurance or reinsurance undertaking would be expected to require in order to take over and meet the insurance and reinsurance obligations.
- The Risk Margin has been calculated in accordance with simplification 3 within the EIOPA guidance, which assumes the SCR will proportionally decrease based on the run-off pattern of net claims payments.
- A 6% Cost of Capital rate is assumed to determine the cost of providing the funds as defined in SII.
- The Risk Margin is calculated to be €333k (2023: €277k).

Reinsurance Recoverables

- TPs are calculated gross, and the reinsurance recoverable asset is calculated using a similar corresponding approach, consistent with the boundaries of the inwards contracts to which those relate. Additionally, future reinsurance costs are adjusted where necessary to allow for contractual obligations of non-proportional reinsurance contracts.
- The reinsurance recoverable asset has been adjusted to allow for the best estimate probability of reinsurer default. Reinsurance recoverables relate to insurance liabilities ceded to A-rated reinsurers for quota share, and a panel of A-rated reinsurers for excess of loss reinsurance.

D. Valuation for Solvency Purposes

Level of uncertainty associated with the amount of TP's

The key assumptions that may impact the Technical Provisions are detailed below along with the comments regarding the materiality of these assumptions.

- **Assumed loss ratio:** Loss ratios are calculated by scheme and reviewed and approved by the Underwriting and Claims Committee.
- **Settlement period:** Claims settlement patterns are calculated by scheme and based on historical data. The settlement patterns feed into the Technical Provisions to split out the future cashflows by period.
- **Discount rate:** The short-tailed nature of the liabilities underwritten by the Company means that discounting benefit applied to the Technical Provisions is relatively low.
- **Expenses:** The relevant expenses involved in the operation of the Company are included within the calculation of the technical provisions.
- **Reinsurance:** It is assumed that the reinsurance will perform as expected, although the technical provisions include an allowance for bad debt.
- **ENIDs:** Events not in Data (“ENIDs”) are calculated based on scenario analysis for each line of business underwritten by CIEL. The amount calculated is small compared with other elements in the calculation of the technical provisions.

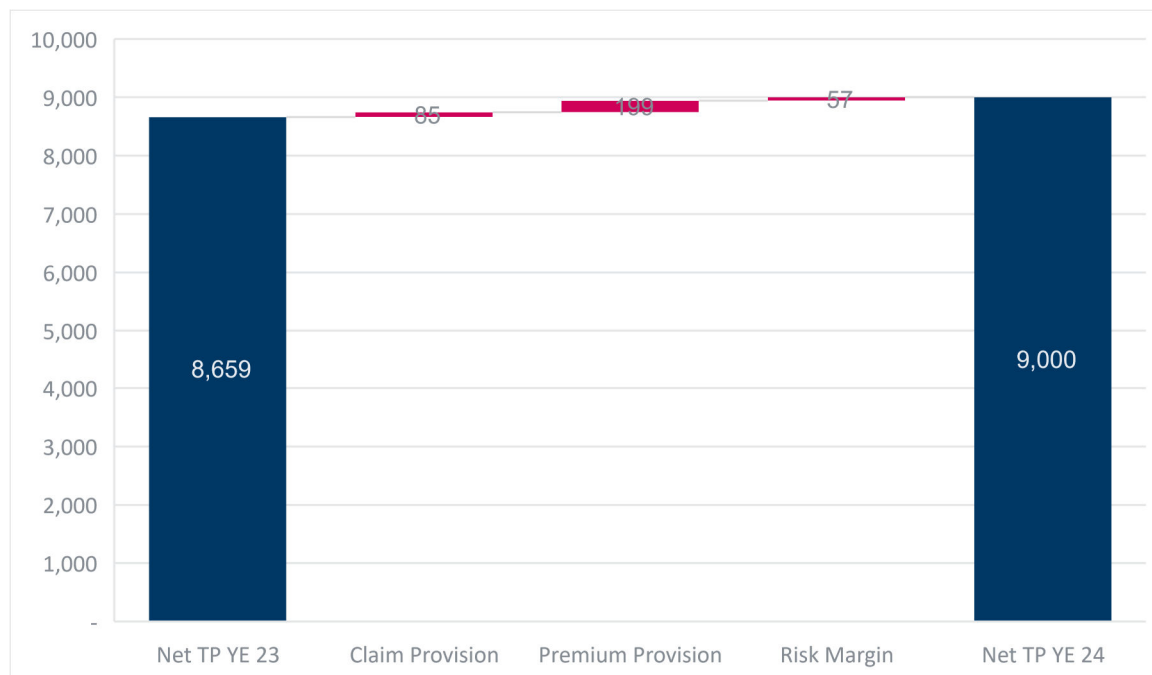
Matching adjustment, volatility adjustment and transitional provisions

The Company has no matching adjustments, volatility adjustments or transitional measures as at the reporting period.

Changes to technical provisions from previous reporting period

The following graph shows the walk from year end 2023 Solvency II TPs to year end 2024 Solvency II TPs.

SII Technical Provisions FY23 to FY24 – Net of Reinsurance



Key for waterfalls:

decrease in TP's

increase in TP's

D. Valuation for Solvency Purposes

Reinsurance

The Company's reinsurance program comprises of two components –Excess of Loss (XOL) and Quota Share (QS) reinsurance. The Company has two XOL treaties, one covering International Private Medical and another for Travel Insurance, as ordinarily these are the only products exposed to large losses. The treaties are placed predominantly into the Lloyd's and London reinsurance market. For the QS programme we strictly adhere to our appetite in terms of security of reinsurers with all our reinsurers being A-rated or better.

Claims Management Procedures

Claims management procedures utilised by CIEL are broadly similar year on year and incorporate both direct and indirect costs associated with the management and settlement of claims.

D.3 Other Liabilities – Solvency II balance sheet

Financial liabilities are recognised when CIEL become a party to the contractual provisions of the instrument. Financial liabilities are classified according to the substance of the contractual arrangement entered into.

All financial liabilities are initially measured at transaction price.

The following table shows a comparison of other liabilities figures under both Solvency II and IFRS for the Group.

Other Liabilities	Solvency II	IFRS	Movement
	€'000	€'000	€'000
Deferred tax liabilities	2,301	-	2,301
Insurance & intermediaries payables	7,335	12,574	(5,239)
Payables (trade, not insurance)	1,953	2,193	(240)
Total other liabilities	11,589	14,767	(3,178)

A deferred tax liability of €2,301k is recognised on the Solvency II balance sheet in respect of difference on the valuation of assets and liabilities and their corresponding tax base.

Insurance & intermediaries payables under Solvency II are reclassified as either Insurance Contract Liabilities or Payables (trade not insurance) in the case of certain accruals under IFRS. Payables (trade, not insurance) on the IFRS balance sheet includes indirect tax liabilities, amounts due to Group undertakings other payables. The difference in value between the two accounting basis relates to reclassifications rather than valuation differences.

D.4 Alternative methods for valuation

No alternative valuation methods have been utilised by CIEL.

D.5 Any other information / disclosures

There has been a change in the methodology used to calculate expenses within the TPs and this also resulted in changes to the cashflow profile used to calculate the discounting benefit.

D. Valuation for Solvency Purposes

Company Information

The following table shows a comparison of asset figures under both Solvency II and IFRS for CIEL.

Assets	Solvency II	IFRS	Movement
	€'000	€'000	€'000
Financial assets	30,644	30,558	86
Reinsurance contract assets		4,232	(4,232)
Reinsurance recoverables from:	2,230	-	2,230
Non-life excluding health	-	-	-
Health similar to non-life	2,230	-	2,230
Insurance contract assets			
Insurance and intermediaries receivables	2,054	43,739	(41,685)
Reinsurance receivables	-	-	-
Receivables (trade, not insurance)	1,296	201	1,095
Cash and cash equivalents	1,698	1,698	-
Total assets	37,922	80,428	(42,506)

There are no differences in the calculation of assets between the Group and the Company.

There is no additional information to be provided on the valuation and calculation of technical provisions in relation to the Company that have been provided in Section D.2.

The following table shows a comparison of other liabilities figures under both Solvency II and IFRS for CIEL.

Other Liabilities	Solvency II	IFRS	Movement
	€'000	€'000	€'000
Deferred tax liabilities	2,301	-	2,301
Insurance & intermediaries payables	7,335	12,574	(5,239)
Payables (trade, not insurance)	1,936	2,176	(240)
Total other liabilities	11,572	14,750	(3,178)

There are no differences in the calculation of other liabilities between the Group and the Company.

Under the accounting valuation of IFRS 17, the insurance and reinsurance payables together with the trade payables are now classified as part of the insurance contract liabilities.

There are no other material information relating to valuation of assets or other liabilities, and there have been no material changes in the valuation of assets or liabilities during the year.

E. Capital Management

E. Capital Management

E.1 Own Funds

The Group aims to ensure that its 'own funds' consists of the appropriate mix of 'tier 1', 'tier 2' and 'tier 3' (including ancillary own funds) capital as defined by Chapter 5 MFSA insurance rules issued under the Insurance Business Act. However, as far as possible the Group will aim to have tier 1 capital. The Group's own funds shall take the form of:

- Ordinary Share Capital
- Retained Earnings
- Shareholders' contribution
- Unpaid and uncalled Share Capital
- Any other capital admissible under the above insurance rules

The following table analysis the movement of capital between tiers as at 30 April 2024 and 2023:

CHEL Own funds	Own Funds Quality	FY24	FY23	Movement
		€'000	€'000	€'000
Ordinary share capital	Tier 1	7,400	7,400	-
Shareholders' contribution	Tier 1	700	700	-
Reconciliation reserve	Tier 1	9,892	4,925	4,967
Net deferred tax assets	Tier 3	-	-	-
Total Own Funds		17,992	13,025	4,967

Total own funds are utilised to cover the SCR for the Group. Only Tier 1 Capital is utilised to cover the MCR for CIEL.

The Group's components of own funds are detailed below:

Tier 1 Capital

Tier 1 Capital is made up of paid-in ordinary share capital, shareholders' contribution and the reconciliation reserve. This is of the highest quality and permanent. The paid-in ordinary share capital amounted to €7,400,000 (2023: €7,400,000). The Group has further a paid in shareholders' contribution of €700,000, which has remained unchanged since incorporation.

The reconciliation reserve is made up of the following:

Group	FY24	FY23
	€'000	€'000
Solvency II Excess of Assets over Liabilities	17,992	13,025
Other Basic Own Funds Items	8,100	8,100
Reconciliation reserve	9,892	4,925

E. Capital Management

The following table provides a reconciliation between the Group Solvency II Own Funds and the Total Group Equity as per IFRS:

	FY24	FY23
	€'000	€'000
Solvency II Excess of Assets over Liabilities	17,992	13,025
Difference in the value of assets	30,830	37,198
Difference in the value of gross technical provisions	(43,293)	(46,090)
Difference in the value of other liabilities	8,497	8,966
Total Group Equity as per IFRS	14,026	13,099

The differences in assets are explained in D.1, the differences in technical provisions are explained in D.2, whilst the differences in other liabilities are explained in D.3. The 2023 figures under the accounting valuation have been restated to reflect the restated figures under IFRS 17, as shown in the financial statements.

Tier 3 Capital

Tier 3 capital is made up of the Net Deferred Tax Asset. As at 30 April 2024, the Company did not recognise a deferred tax asset.

None of the Group's own funds are subject to transitional arrangement. No additional ratios to the ones calculated and disclosed in template S.23.01 are included in this document. None of the Group's own funds are transferable or fungible.

Capital Management

The Company's capital is managed to ensure that all regulatory requirements in relation to capital levels maintained are satisfied. To achieve this objective, the following capital requirements are adhered to:

- The Solvency Capital Requirement (SCR) calculation
- The Minimum Capital Requirements (MCR) calculation

The Board ensures that the higher of these two capital requirement assessments shall be maintained. Secondary to fulfilling the Group's regulatory requirements as described above, the Board aims to maximize the employment of capital, subject to the conditions imposed by the Group's investment policy.

The Board formally reviews the utilization of the Group's capital and the overall effectiveness of its capital management policy at least annually.

There are no additional solvency ratios to the ones included in template S.23.01 (i.e., SCR and MCR) to be disclosed by the Group.

Calculation of Group Own Funds and Calculation of Solvency

Group own funds and solvency capital calculations have been carried out in accordance with Method 1 – Accounting consolidation-based method in accordance with Article 230 of the Directive.

The Directors of CIEL have determined that CISEL should be classified as a strategic participation when considering the requirements of Article 335 of the Solvency II Directive and EIOPA published Q&A ID 649.

Capital Shortfalls

The Board is confident that in the event of a capital shortfall that the Collinson Group, in response to a justified request for a capital injection, will take the necessary action to ensure that the Group's regulatory capital requirements are met.

E. Capital Management

In the unforeseen event that the Group faces insufficient levels of Capital to meet its regulatory requirements, the Board shall investigate alternative measures to realign the business plan with its capital base. These measures shall include de-risking, amendments to underwriting and risk retention strategy, amendment to pricing strategy and, if necessary, to request additional capital from the parent.

The Group has the following components of own funds as at 30 April 2024 and 2023: Tier 1 basic own funds; ordinary share capital, capital contribution and reconciliation reserve.

The Group's ordinary shares have full voting, dividend, and capital distribution (including on winding up) rights; they do not confer any rights of redemption.

No own funds items are subject to transitional arrangements.

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

E.2 Solvency Capital Requirement and Minimum Capital Requirement

Solvency Capital Requirement Coverage

Group Solvency Position	FY24 €'000	FY23 €'000
Group's Own Funds to cover the SCR	17,992	13,025
Solvency Capital Requirement	7,131	5,045
SCR Coverage Ratio	252%	258%
Group's Own Funds to cover the Minimum Consolidated Group SCR	17,992	13,025
Minimum Consolidated Group SCR	4,000	4,000
Minimum Consolidated Group SCR Coverage Ratio	450%	326%

The Group uses EIOPA's Solvency II standard formula as the basis for calculating the SCR.

The minimum consolidated Group SCR was calculated in accordance with the Commission Delegated Regulation. With effect from October 2022, the absolute floor for the calculation of the MCR increased from €3,700,000 to €4,000,000. The MCR remained at the level of the absolute MCR (AMCR) of €4,000,000 (2023: €4,000,000).

The SCR and MCR are calculated on the basis of the eligible own funds.

The Own Funds available to cover the SCR and MCR has been positively impacted by the higher net asset value of CISEL and by the financial results registered during the year under review.

E. Capital Management

The calculation below shows the net best estimates and net written premiums for the year 2024 per line of business utilised in the calculation of the linear minimum consolidated Group SCR.

Linear formula component for non-life insurance obligations	€'000	Net best estimate and TP calculated as a whole €'000	Net written premium in the last 12 months €'000
Medical expense insurance		375	14,934
Other motor		183	3,385
Fire and other damage to property		-	247
Assistance		8,134	10,878
Miscellaneous financial loss		-	12
Overall MCR calculation			
Linear MCR	3,445		
SCR	7,131		
MCR cap	3,209		
MCR floor	1,783		
Combined MCR	3,209		
Absolute floor of the MCR	4,000		
Minimum Capital Requirement	4,000		

Solvency Capital Position

During the year, the Group continued to keep under review the assumptions underpinning the standard formula and assessment that the continued use of the standard formula to calculate the SCR remains appropriate.

As set out in the EIOPA Directive, the Group's solvency position is calculated using method 1 ("accounting consolidation-based method"). The Group held €17,992k of eligible unrestricted Own Funds to cover the SCR as at 30 April 2024 (2023: €13,025k). The Group held sufficient capital to cover the SCR throughout the reporting period.

E. Capital Management

The table below provides a breakdown of the components of CHEL's SCR as at 30 April 2024:

CHEL Solvency Capital Requirement	FY24 €'000	FY23 €'000	Movement €'000
Non-Life Underwriting	3,095	2,041	1,054
Health Underwriting	2,624	1,819	805
Market Risk	2,187	1,235	952
Counterparty Default	435	836	(401)
Undiversified BSCR	8,341	5,931	2,410
Diversification	(2,856)	(2,050)	(806)
Base SCR	5,485	3,881	1,604
Operational Risk	1,646	1,164	482
Group Solvency Capital Requirement	7,131	5,045	2,086
Group's Own Funds to cover the SCR	17,992	13,025	4,967
Group SCR Coverage Ratio	252%	258%	(6%)

Changes to the methodology of the underlying SCR calculation

No changes were made to the methodology of the underlying SCR calculation during the year ended 30 April 2024.

Undertaking Specific Parameters (USPs)

The Group does not use any Company undertaking specific parameters in the standard formula calculation. Simplified calculations are used in computing spread risk within the Market Risk Module in accordance with Article 104 of the regulations.

Capital add-on

The Group does not make use of any capital add-ons, as the risk profile does not deviate significantly from the assumptions underpinning the calibration of the standard formula.

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

The duration-based method of calculating the equity risk sub-module has not been used in the Company's SCR calculation.

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

The Group uses solely the standard formula for its solvency capital requirement calculation.

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

During the financial year ended 30 April 2024 there were no instances during which the Group was not compliant with both the MCR and SCR. Furthermore, the Board of CIEL approved an ORSA report during 2024 which showed that the Company expects to meet its capital requirements over its planning period.

E.6 Any other information

Loss absorbing capacity of deferred tax

No allowance has been made for the loss absorbing capacity of deferred tax within the SCR calculations.

E. Capital Management

Company information

The section provides information of the Capital Management in respect of the Company. There are no material differences with respect to the capital management processes between the Group and the Company except as explained below.

The following table analyses the movement of capital between tiers of CIEL as at 30 April 2024 and 2023:

CIEL Own funds	Own Funds Quality	FY24	FY23	Movement
		€'000	€'000	€'000
Ordinary share capital	Tier 1	8,300	8,300	-
Capital contribution	Tier 1	700	700	-
Reconciliation reserve	Tier 1	6,121	683	5,438
Net deferred tax assets	Tier 3	-	-	-
Total Own Funds		15,121	9,683	5,438

The reconciliation reserve is made up of the following:

CIEL	FY24	FY23
	€'000	€'000
Solvency II Excess of Assets over Liabilities	15,121	9,683
Other Basic Own Funds Items	9,000	9,000
Reconciliation reserve	6,121	683

The following table provides a reconciliation between CIEL Solvency II Own Funds and the Total Equity as per IFRS:

	FY24	FY23
	€'000	€'000
Solvency II Excess of Assets over Liabilities	15,121	9,683
Difference in the value of assets	30,830	37,198
Difference in the value of gross technical provisions	(43,293)	(46,090)
Difference in the value of other liabilities	8,497	8,966
Total Group Equity as per IFRS	11,155	9,757

E. Capital Management

CIEL's solvency position as at 30 April 2024 was as follows:

Solvency Position	FY24 €'000	FY23 €'000
Company's Own Funds to cover the SCR	15,121	9,683
Solvency Capital Requirement	6,752	4,702
SCR Coverage Ratio	224%	206%
Company's Own Funds to cover the MCR	15,121	9,683
Minimum Capital Requirement	4,000	4,000
MCR Coverage Ratio	378%	242%

The calculation below shows the net best estimates and net written premiums for the year 2024 per line of business utilised in the calculation of the Linear minimum SCR.

Linear formula component for non-life insurance obligations	€'000	Net best estimate and TP calculated as a whole €'000	Net written premium in the last 12 months €'000
Medical expense insurance		375	14,934
Other motor		183	3,385
Fire and other damage to property		-	247
Assistance		8,134	10,878
Miscellaneous financial loss		-	12
Overall MCR calculation			
Linear MCR	3,445		
SCR	6,752		
MCR cap	3,038		
MCR floor	1,688		
Combined MCR	3,038		
Absolute floor of the MCR	4,000		
Minimum Capital Requirement	4,000		

E. Capital Management

The table below provides a breakdown of the components of CIEL Solvency Capital Requirement (SCR) as at 30 April 2024:

Solvency Capital Requirement	FY24 €'000	FY23 €'000	Movement €'000
Non-Life Underwriting	3,095	2,041	1,054
Health Underwriting	2,624	1,819	805
Market Risk	1,743	781	962
Counterparty Default	435	836	(401)
Undiversified BSCR	7,897	5,477	2,420
Diversification	(2,703)	(1,860)	(843)
Base SCR	5,194	3,617	1,577
Operational Risk	1,558	1,085	473
Solvency Capital Requirement	6,752	4,702	2,050
Company's Own Funds to cover the SCR	15,121	9,683	5,438
SCR Coverage Ratio	224%	206%	18%

There is no other information to report on.

Appendix 1 – CHEL Quantitative Reporting Templates (QRTs)

Collinson Holdings

Solvency and Financial Condition Report

Disclosures

30 April

2024

(Monetary amounts in EUR thousands)

General information

Participating undertaking name	Collinson Holdings Europe Limited
Group identification code	213800VYZJWV85MVON54
Type of code of group	LEI
Country of the group supervisor	MT
Language of reporting	en
Reporting reference date	30 April 2024
Currency used for reporting	EUR
Accounting standards	IFRS
Method of Calculation of the group SCR	Standard formula
Method of group solvency calculation	Method 1 is used exclusively
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

- S.02.01.02 - Balance sheet
- S.05.01.02 - Premiums, claims and expenses by line of business: Non-life insurance and reinsurance obligations
- S.05.02.04 - Premiums, claims and expenses by country: Non-life insurance and reinsurance obligations
- S.23.01.22 - Own Funds
- S.25.01.22 - Solvency Capital Requirement - for groups on Standard Formula
- S.32.01.22 - Undertakings in the scope of the group

S.02.01.02

Balance sheet

Solvency II value	
C0010	
	0
	33,524
	0
	2,880
	0
	0
	0
	0
	0
	0
	0
	30,644
	0
	0
	2,230
	2,230
	0
	2,230
	0
	0
	2,054
	1,296
	0
	1,705
	40,809

Assets

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

S.02.01.02

Balance sheet

		Solvency II value
		C0010
		11,229
R0510	Technical provisions - non-life	8,454
R0520	<i>Technical provisions - non-life (excluding health)</i>	0
R0530	<i>TP calculated as a whole</i>	8,291
R0540	<i>Best Estimate</i>	163
R0550	<i>Risk margin</i>	2,776
R0560	<i>Technical provisions - health (similar to non-life)</i>	0
R0570	<i>TP calculated as a whole</i>	2,605
R0580	<i>Best Estimate</i>	171
R0590	<i>Risk margin</i>	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	<i>Technical provisions - health (similar to life)</i>	0
R0620	<i>TP calculated as a whole</i>	
R0630	<i>Best Estimate</i>	
R0640	<i>Risk margin</i>	
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	0
R0660	<i>TP calculated as a whole</i>	
R0670	<i>Best Estimate</i>	
R0680	<i>Risk margin</i>	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	<i>TP calculated as a whole</i>	
R0710	<i>Best Estimate</i>	
R0720	<i>Risk margin</i>	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	2,301
R0790	Derivatives	
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	7,335
R0830	Reinsurance payables	
R0840	Payables (trade, not insurance)	1,953
R0850	Subordinated liabilities	0
R0860	<i>Subordinated liabilities not in BOF</i>	
R0870	<i>Subordinated liabilities in BOF</i>	0
R0880	Any other liabilities, not elsewhere shown	
R0900	Total liabilities	22,818
R1000	Excess of assets over liabilities	17,992

S.23.01.22
Own Funds

Basic own funds before deduction for participations in other financial sector

Own funds when using the D&A, exclusively or in combination with method 1

R0450	Own funds aggregated when using the D&A and combination of method
R0460	Own funds aggregated when using the D&A and combination of method net of IGT
R0520	Total available own funds to meet the consolidated part of the group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)
R0530	Total available own funds to meet the minimum consolidated group SCR
R0560	Total eligible own funds to meet the consolidated part of the group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)
R0570	Total eligible own funds to meet the minimum consolidated group SCR (group)
R0610	Minimum consolidated Group SCR
R0650	Ratio of Eligible own funds to Minimum Consolidated Group SCR
R0660	Total eligible own funds to meet the total group SCR (including own funds from other financial sector and from the undertakings included via D&A)
R0680	Total Group SCR
R0690	Ratio of Total Eligible own funds to Total group SCR - ratio including other financial sectors and the undertakings included via D&A

Reconciliation reserve

R0700	Excess of assets over liabilities
R0710	Own shares (held directly and indirectly)
R0720	Forseeable dividends, distributions and charges
R0730	Other basic own fund items
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds
R0750	Other non available own funds
R0760	Reconciliation reserve

Expected profits

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

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
0				
0				
17,992	17,992	0	0	0
17,992	17,992	0	0	
17,992	17,992	0	0	0
17,992	17,992	0	0	
4,000				
449.79%				
17,992	17,992	0	0	0
7,131				
252.32%				
C0060				
17,992				
0				
0				
8,100				
0				
0				
9,892				
4,507				
4,507				

S.25.01.22

Solvency Capital Requirement - for groups on Standard Formula

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
R0010 Market risk	2,187		
R0020 Counterparty default risk	435		
R0030 Life underwriting risk	0		
R0040 Health underwriting risk	2,624		
R0050 Non-life underwriting risk	3,095		
R0060 Diversification	-2,856		
R0070 Intangible asset risk	0		
R0100 Basic Solvency Capital Requirement	5,485		
Calculation of Solvency Capital Requirement			
R0130 Operational risk	1,646		
R0140 Loss-absorbing capacity of technical provisions	0		
R0150 Loss-absorbing capacity of deferred taxes	0		
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200 Solvency Capital Requirement calculated on the basis of Art. 336 (a) of Delegated Regulation (EU) 2015/35, excluding capital add-on	7,131		
R0210 Capital add-ons already set	0		
R0211 <i>of which, capital add-ons already set - Article 37 (1) Type a</i>	0		
R0212 <i>of which, capital add-ons already set - Article 37 (1) Type b</i>	0		
R0213 <i>of which, capital add-ons already set - Article 37 (1) Type c</i>	0		
R0214 <i>of which, capital add-ons already set - Article 37 (1) Type d</i>	0		
R0220 Consolidated Group SCR	7,131		
Other information on SCR			
R0400 Capital requirement for duration-based equity risk sub-module	0		
R0410 Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420 Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430 Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440 Diversification effects due to RFF nSCR aggregation for article 304	0		
R0470 Minimum consolidated group solvency capital requirement	4,000		
Information on other entities			
R0500 Capital requirement for other financial sectors (Non-insurance capital requirements)	0		
R0510 <i>Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies</i>	0		
R0520 <i>Institutions for occupational retirement provisions</i>	0		
R0530 <i>Capital requirement for non-regulated entities carrying out financial activities</i>	0		
R0540 Capital requirement for non-controlled participation requirements	0		
R0550 Capital requirement for residual undertakings	0		
R0555 Capital requirement for collective investment undertakings or investments packaged as funds	0		
Overall SCR			
R0560 SCR for undertakings included via D&A method	0		
R0570 Total group solvency capital requirement	7,131		

USP Key

For life underwriting risk:
 1 - Increase in the amount of annuity benefits
 9 - None

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

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

S.32.01.22

Undertakings in the scope of the group

	Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/ non mutual)	Supervisory Authority
Row	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080
1	MT	213800MQ8NUT2HQS269	LEI	Collinson Insurance Europe Limited	Non life insurance undertaking	Non life insurance undertaking	Non-mutual	Malta Financial Services Authority

S.32.01.22

Undertakings in the scope of the group

Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal Name 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	
Row	C0010	C0020	C0030	C0040	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
1	MT	Z13800MQ8NUT2HQS269	LEI	Collinson Insurance Europe Limited	100.00%	100.00%	100.00%		Significant	100.00%	Included in the scope		Method 1: Full consolidation

Appendix 2 – CIEL Quantitative Reporting Templates (QRTs)

Collinson Insurance

Solvency and Financial Condition Report

Disclosures

30 April

2024

(Monetary amounts in EUR thousands)

General information

Undertaking name	Collinson Insurance Europe Limited
Undertaking identification code	213800QM8NUT2HQS269
Type of code of undertaking	LEI
Type of undertaking	Non-Life insurance undertakings
Country of authorisation	MT
Language of reporting	en
Reporting reference date	30 April 2024
Currency used for reporting	EUR
Accounting standards	IFRS
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

- S.02.01.02 - Balance sheet
- S.04.05.21 - Premiums, claims and expenses by country: Non-life insurance and reinsurance obligations
- S.05.01.02 - Premiums, claims and expenses by line of business: Non-life insurance and reinsurance obligations
- S.17.01.02 - Non-Life Technical Provisions
- S.19.01.21 - Non-Life insurance claims
- S.23.01.01 - Own Funds
- S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula
- S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

S.04.05.21

Premiums, claims and expenses by country: Non-life insurance and reinsurance obligations

Home Country	Top 5 countries (by amount of gross premiums written): non-life					
	NO	IE	IT	FR	DE	
R0010						
Premiums written (gross)	C0010	C0020	C0021	C0022	C0023	C0024
R0020 Gross Written Premium (direct)	60	156	76,309	16,241	3,107	2,480
R0021 Gross Written Premium (proportional reinsurance)						
R0022 Gross Written Premium (non-proportional reinsurance)						
Premiums earned (gross)						
R0030 Gross Earned Premium (direct)	70	160	72,335	15,710	3,113	2,448
R0031 Gross Earned Premium (proportional reinsurance)						
R0032 Gross Earned Premium (non-proportional reinsurance)						
Claims incurred (gross)						
R0040 Claims incurred (direct)	18	46	33,388	4,570	711	611
R0041 Claims incurred (proportional reinsurance)						
R0042 Claims incurred (non-proportional reinsurance)						
Expenses incurred (gross)						
R0050 Gross Expenses Incurred (direct)	7	18	8,970	1,909	365	292
R0051 Gross Expenses Incurred (proportional reinsurance)						
R0052 Gross Expenses Incurred (non-proportional reinsurance)						

S.17.01.02

Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance											Accepted non-proportional reinsurance				Total Non-Life obligation	
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance		Non-proportional property reinsurance
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
R0010	Technical provisions calculated as a whole	0				0		0				0	0					0
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	0						0				0	0					0
Technical provisions calculated as a sum of BE and RM																		
Best estimate																		
Premium provisions																		
R0060	Gross	-2,708				-37		-78				5,372	-2					2,546
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	-2,063				-98		-33				-1,906	0					-4,101
R0150	Net Best Estimate of Premium Provisions	-645				62		-45				7,278	-2					6,647
Claims provisions																		
R0160	Gross	5,313				252		54				2,731	0					8,349
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	4,292				131		33				1,875	0					6,331
R0250	Net Best Estimate of Claims Provisions	1,021				121		21				856	0					2,019
R0260	Total best estimate - gross	2,605				215		-25				8,103	-2					10,896
R0270	Total best estimate - net	375				183		-24				8,134	-2					8,666
R0280	Risk margin	171				20		3				139	0					334
R0320	Technical provisions - total	2,776				236		-21				8,242	-2					11,229
R0330	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	2,230				32		-1				-31	0					2,230
R0340	Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	546				203		-20				8,273	-2					9,000

S.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020 Accident year / underwriting year

Gross Claims Paid (non-cumulative)

(absolute amount)

Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
	Development year											In Current year	Sum of years (cumulative)
	0	1	2	3	4	5	6	7	8	9	10 & +		
R0100	Prior											0	0
R0160	-9	0	0	0	0	0	0	0	0	0	0	0	0
R0170	-8	0	0	0	0	0	0	0	0	0		0	0
R0180	-7	0	0	0	0	0	0	0	0			0	0
R0190	-6	0	0	0	0	0	0	0				0	0
R0200	-5	0	4,662	3,132	137	-99	-1					-1	7,831
R0210	-4	345	6,411	2,899	525	179						179	10,360
R0220	-3	531	9,338	10,236	2,154							2,154	22,259
R0230	-2	1,282	17,992	16,743								16,743	36,017
R0240	-1	1,283	23,674									23,674	24,957
R0250	0	2,105										2,105	2,105
R0260												Total	44,853

Gross Undiscounted Best Estimate Claims Provisions

(absolute amount)

Year	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	
	Development year											Year end (discounted data)	
	0	1	2	3	4	5	6	7	8	9	10 & +		
R0100	Prior											0	
R0160	-9	0	0	0	0	0	0	0	0	0	0	0	
R0170	-8	0	0	0	0	0	0	0	0	0		0	
R0180	-7	0	0	0	0	0	0	0	0			0	
R0190	-6	0	0	0	0	0	0	0				0	
R0200	-5	0	0	0	0	-8	10					10	
R0210	-4	0	0	0	140	12						12	
R0220	-3	0	0	1,820	403							392	
R0230	-2	0	6,315	1,580								1,548	
R0240	-1	1,340	4,880									4,789	
R0250	0	1,650										1,598	
R0260												Total	8,349

**S.23.01.01
Own Funds**

Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35

R0010	Ordinary share capital (gross of own shares)
R0030	Share premium account related to ordinary share capital
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings
R0050	Subordinated mutual member accounts
R0070	Surplus funds
R0090	Preference shares
R0110	Share premium account related to preference shares
R0130	Reconciliation reserve
R0140	Subordinated liabilities
R0160	An amount equal to the value of net deferred tax assets
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above
R0220	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds
R0230	Deductions for participations in financial and credit institutions
R0290	Total basic own funds after deductions

Ancillary own funds

R0300	Unpaid and uncalled ordinary share capital callable on demand
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand
R0320	Unpaid and uncalled preference shares callable on demand
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC
R0390	Other ancillary own funds
R0400	Total ancillary own funds

Available and eligible own funds

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

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

Reconciliation reserve

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

Expected profits

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

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
8,300	8,300		0	
0	0		0	
0	0		0	
0		0	0	0
0	0			
0		0	0	0
0		0	0	0
6,121	6,121			
0		0	0	0
0				0
700	700	0	0	0
0				
0				
15,121	15,121	0	0	0

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

15,121	15,121	0	0	0
15,121	15,121	0	0	
15,121	15,121	0	0	0
15,121	15,121	0	0	

6,752
4,000
223.96%
378.03%

C0060
15,121
0
9,000
0
6,121

4,507
4,507

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

- R0010 Market risk
- R0020 Counterparty default risk
- R0030 Life underwriting risk
- R0040 Health underwriting risk
- R0050 Non-life underwriting risk
- R0060 Diversification

R0070 Intangible asset risk

R0100 **Basic Solvency Capital Requirement**

Calculation of Solvency Capital Requirement

- R0130 Operational risk
- R0140 Loss-absorbing capacity of technical provisions
- R0150 Loss-absorbing capacity of deferred taxes
- R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC
- R0200 **Solvency Capital Requirement excluding capital add-on**
- R0210 Capital add-ons already set
- R0211 *of which, capital add-ons already set - Article 37 (1) Type a*
- R0212 *of which, capital add-ons already set - Article 37 (1) Type b*
- R0213 *of which, capital add-ons already set - Article 37 (1) Type c*
- R0214 *of which, capital add-ons already set - Article 37 (1) Type d*
- R0220 **Solvency capital requirement**

Other information on SCR

- R0400 Capital requirement for duration-based equity risk sub-module
- R0410 Total amount of Notional Solvency Capital Requirements for remaining part
- R0420 Total amount of Notional Solvency Capital Requirements for ring fenced funds
- R0430 Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios
- R0440 Diversification effects due to RFF nSCR aggregation for article 304

Approach to tax rate

- R0590 Approach based on average tax rate

Calculation of loss absorbing capacity of deferred taxes

- R0640 LAC DT
- R0650 LAC DT justified by reversion of deferred tax liabilities
- R0660 LAC DT justified by reference to probable future taxable economic profit
- R0670 LAC DT justified by carry back, current year
- R0680 LAC DT justified by carry back, future years
- R0690 Maximum LAC DT

Gross solvency capital requirement	USP	Simplifications
C0110	C0090	C0120
1,743		
435		
0		
2,624		
3,095		
-2,704		

0
5,194

C0100
1,558
0
0
6,752
0
0
0
0
0
6,752

0
0
0
0
0

Yes/No

C0109
Not applicable

LAC DT

C0130
0
0
0
0
0

USP Key

For life underwriting risk:
1 - Increase in the amount of annuity benefits
9 - None

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

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

S.28.01.01

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

Linear formula component for non-life insurance and reinsurance obligations

R0010 MCR_{NL} Result

C0010	3,445
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Net (of reinsurance /SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
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- R0020 Medical expense insurance and proportional reinsurance
- R0030 Income protection insurance and proportional reinsurance
- R0040 Workers' compensation insurance and proportional reinsurance
- R0050 Motor vehicle liability insurance and proportional reinsurance
- R0060 Other motor insurance and proportional reinsurance
- R0070 Marine, aviation and transport insurance and proportional reinsurance
- R0080 Fire and other damage to property insurance and proportional reinsurance
- R0090 General liability insurance and proportional reinsurance
- R0100 Credit and suretyship insurance and proportional reinsurance
- R0110 Legal expenses insurance and proportional reinsurance
- R0120 Assistance and proportional reinsurance
- R0130 Miscellaneous financial loss insurance and proportional reinsurance
- R0140 Non-proportional health reinsurance
- R0150 Non-proportional casualty reinsurance
- R0160 Non-proportional marine, aviation and transport reinsurance
- R0170 Non-proportional property reinsurance

C0020	C0030
375	14,934
0	
0	
0	
183	3,385
0	
0	247
0	
0	
8,134	10,878
0	12
0	
0	
0	
0	

Linear formula component for life insurance and reinsurance obligations

R0200 MCR_L Result

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

C0050	C0060

Overall MCR calculation

- R0300 Linear MCR
- R0310 SCR
- R0320 MCR cap
- R0330 MCR floor
- R0340 Combined MCR
- R0350 Absolute floor of the MCR
- R0400 Minimum Capital Requirement

C0070	3,445
	6,752
	3,038
	1,688
	3,038
	4,000
	4,000

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