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# Solvency Financial Condition Report

StarStone Insurance SE

31 December 2022



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## About this document

The purpose of the Solvency and Financial Condition Report<sup>1</sup> ("SFCR") is to provide qualitative and quantitative information on StarStone Insurance SE's ("the Company", "SISE" or "StarStone") business and performance, system of governance, risk profile, valuation for solvency purposes and capital management together with standardised Quantitative Reporting Templates ("QRTs"). The SFCR has been prepared based on the requirements and principles of Article 35 of the Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance commonly referred to as the Solvency II ("SII") Directive as implemented in Liechtenstein and the Solvency II Regulations and Guidelines. The SFCR provides stakeholders with additional information over and above that contained in the annual financial statements.

The quantitative data presented in this report is presented in United States Dollars ("USD" or "\$") which is the Company's functional and reporting currency.

This report is unaudited. However, the Company's Solvency II balance sheet included in this report is audited. The Company's Solvency Capital Requirement ("SCR") is not subject to audit this year

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<sup>1</sup> The numbers presented in this document may contain rounding differences to the quantitative reporting templates submitted to the regulator

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## Company Information

### Registered Office

Zollstrasse 82  
9494 Schaan  
Liechtenstein

### Company Registered Number

FL-0002.546.357-6

### Company Regulator

Financial Market Authority  
Landstrasse 109, 9490 Vaduz,  
Liechtenstein

### Group Supervisor

Bermuda Monetary Authority  
43 Victoria Street  
Hamilton, PO Box 2447  
Bermuda

### External Auditors

PricewaterhouseCoopers AG  
Birchstrasse 160,  
8050 Zürich  
Switzerland

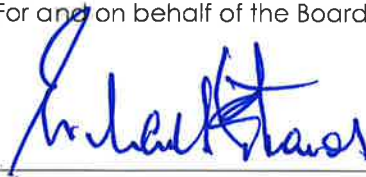
## Statement of Directors' Responsibility

We acknowledge our responsibility for preparing the SFCR in all material respects in accordance with the Solvency II Regulations.

We are satisfied that:

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

For and on behalf of the Board of StarStone Insurance SE



Michael Handler

Member of SISE Board of Directors



Donat Marxer

Member of SISE Board of Directors

3 April 2023

3 April 2023

## Summary

### Background

The Company ceased active underwriting in 2020. The Company continues to service policies and manage claims that remain in force as well as write endorsements to existing policies particularly within Construction business and some business written under binding authorities.

The principal activity of the Company was the underwriting of specialty insurance and reinsurance business. The Company offered a broad range of insurance products to large multi-nationals and small to middle-market clients around the world, with the Company writing a diversified portfolio by territory and line of business. The Company's business was written through its European and UK branch network and Head Office.

SISE continues to be regulated by the Liechtenstein Financial Market Authority ("FMA") with respect to its entire business and additionally in 2021 by the UK Prudential Regulation Authority ("PRA") and Financial Conduct Authority ("FCA") with respect to its UK branch business.

The Company is owned by two companies: StarStone Insurance Bermuda Limited ("SIBL") with 73.74% of the total share capital and StarStone Finance Limited ("SFL") with 26.26% of the total share capital. SIBL owns 100% of the ordinary share capital. The shares owned by SFL are non-voting preference shares and therefore SIBL has 100% of the voting rights. SFL is a wholly owned subsidiary of SIBL.

SIBL is a wholly owned subsidiary of StarStone Specialty Holdings Limited ("SSHL") which is, in turn owned by Kenmare Holdings Ltd (58.98%) ("Kenmare"), Dowling Capital Partners (1.49%), Capital City Partners (0.21%), Trident V Parallel Fund L.P. (15.80%), Trident V Professionals Fund L.P. (0.99%) and Trident V L.P. (22.53%). Kenmare is wholly owned by Enstar Group Limited ("Enstar"). SISE is consolidated into Enstar. A group structure chart is included in A.1.2.

### Developments in the year

The Company's Whole Account intragroup reinsurance arrangement with SIBL is on a risk attaching basis and will continue to protect the existing policies and any endorsements and business written under binding authorities for up to 2020 underwriting year. The intragroup reinsurance cessions under this agreement vary between 65% and 100% depending on the class of business and the underwriting year. This reinsurance arrangement was terminated from the 2021 underwriting year onwards.

A Strategic Plan was submitted to the FMA in September 2020 setting out the Company's strategy in managing the orderly and solvent administration of the Company's business until the liabilities of the Company have been settled. The liabilities of the Company vary in duration and the wind down of the Company's activities is expected to occur over a number of years. The Company continues to monitor the appropriateness of various strategies that either reduces risk or enhances the outcome for all stakeholders when compared to the Strategic Plan.

The London branch in the United Kingdom ("UK") and the Milan branch in Italy are the remaining active branches at the end of 2022.

### Russian Sanctions

The Russian invasion of Ukraine and the resulting impact on global commodity markets has increased commodity inflation rates, disrupted supply chains and generated significant insurance losses. In response, many countries have established comprehensive sanctions regimes increasing both geopolitical tension between NATO and Russia and market volatility. To quantify SISE's exposure, the Company has performed an analysis of, and continues to monitor, direct investments and underwriting risks and the potential for operational disruption (including disruption via our third-party service providers). The Company has concluded that it has no significant direct impacts from this event. SISE continues to monitor for, and respond to, all changes in the global sanction regime, updating its procedures accordingly.

## Climate Change

The Company has ceased writing new and renewal business and hence, exposure to climate-related risks emanates from existing insurance liabilities and the assets that back those liabilities. Climate change may have an adverse impact on the returns from our run-off business as well as our investments, which could have an adverse effect on our results of operations or financial condition. The Company actively considers the potential implications of climate change and sustainability on its operations. **Section C.6.5** sets out further details on climate change.

## Inflation

Claims inflation has been flagged as one of the key challenges facing the insurance industry in the near-term. An exercise was performed to identify the impact of the current economic climate on reserves for each reserving class. The IELR assumption on Construction was increased by 10% for the impact of the higher inflationary environment, which resulted in a 4% increase to the Construction reserve. For all other classes, the impact is relatively low and so is assumed to be inherent in the reserve held.

## Covid-19

The Company has continued to manage the risks associated with COVID-19 in line with the requirements of its risk management policies, focusing on potential impacts on operational risk, insurance risk, investment and markets risk, credit risk and solvency and liquidity risk. The impact on the Company's financial and capital position to date has been limited. In addition, any potential exposure would be mitigated due to the Whole Account intragroup reinsurance arrangement with SIBL and the conservative investment strategy.

## Brexit

Since 1 January 2021, the SISE UK Branch was operating within the UK Temporary Permissions Regime ("TPR") following the end of post-Brexit transition period. The TPR allows EEA-based firms to operate in the UK for a limited period. The branch continued to operate under the TPR during 2022 and filled an application to transition to the Supervised Run-Off Regime ("SROR") with the PRA and the FCA in the second half of 2022. The application to transition to the SROR was approved with an effective date of 1 January 2023.

## Business and Performance

The principal activity of the Company is the administration of specialty insurance and reinsurance business previously underwritten. The Company offered a broad range of insurance products to large multi-nationals and small to middle-market clients around the world through its European branch network and Head Office.

The Company has generated a net loss for the year of \$28.3m (2021: \$3.6m loss) which is primarily driven by the servicing of the Company's administrative expenses, realised and unrealised investment losses and foreign exchange loss. The majority of the Company's underwriting results continue to be ceded out to its parent company, SIBL.

**Section A** sets out further details about the Company's business structure, key operations and financial performance over the reporting period.

## Systems of Governance

The Company operates and maintains the system of governance to meet the requirements of the nature, scale and complexity of these activities.

The Board of Directors ("Verwaltungsrat") and the Management Board ("Geschäftsleitung") of the Company comprises a combination of independent non-executives and executives. All executives are selected on the basis of their skills, knowledge competence and experience.



The Company has identified the following Key Functions in accordance with Solvency II requirements and Liechtenstein law: Risk Management, Compliance, Internal Audit and Actuarial Functions. The respective Key Function Holders are all approved by the regulator for their function and have been assessed to be Fit and Proper ("F&P").

It is the responsibility of the key function owners to maintain the appropriate policy and procedures documentation which incorporate the function's responsibilities for operations, risk management, internal control, internal audit, outsourcing (where relevant) and reporting. All governance documentation is reviewed regularly by either an executive committee or the Board according to its nature.

Two members of the Management Board departed during 2022 with one member resigning and with one members position becoming redundant. The Board recognises the importance of ensuring there is sufficient knowledge and expertise in the Compliance team following the cessation of writing new and renewal business and ongoing administration of SISE's business. As such, the Compliance function continues to maintain a presence in the Company's head office.

The Company's Internal Audit function is provided through the Group function and overseen by the Group Head of Internal Audit.

The Enstar Actuarial team has adopted responsibilities for providing actuarial support to SISE, following the decision to cease underwriting new and renewal business.

The main intra-group outsourcing agreements with EEUL have been continued despite the Company ceasing to write new or renewal business. This continues to be under the responsibility of the SISE Management Board.

**Section B** provides a more detailed overview of the Company's systems of governance.

### Risk Profile

The Company's Enterprise Risk Management ("ERM") Framework aligns risk measurement with capital in order to provide a consistent approach for the separate risks and allows the risk profile to be the driver of the solvency and any own economic capital requirements. Where risk is considered to be excessive, the Company may mitigate that risk. A key mitigating factor is the purchase of reinsurance which is used to reduce exposure to Underwriting risk.

The distribution of the Company's quantifiable risks, as reflected in the SCR, is as follows:

Standard Categories \$000	Formula	Risk	2022	2022 %	2021	2021 %
Market risk			10,308	19%	11,269	14%
Counterparty default risk			16,247	30%	28,875	37%
Non-life underwriting risk			16,950	31%	23,554	30%
Health underwriting risk			295	1%	376	0%
Operational Risk			9,986	19%	14,996	19%
<b>SCR before diversification benefit</b>			<b>53,786</b>	<b>100%</b>	<b>79,071</b>	<b>100%</b>
Diversification			(10,513)		(14,087)	
<b>SCR</b>			<b>43,273</b>		<b>64,984</b>	

The Company considers that the key risk and uncertainties relate to underwriting, market and counterparty default risk.

The 2022 SCR has decreased by \$21.7m since 2021 from \$65.0m to \$43.3m in line with the reduction in risk charges in all risk categories as the Company continues to run-off.

- Market Risk has decreased as a result of a reduction in spread risk and currency risk offset by increases in interest rate risk and concentration risk.
- Counterparty Default Risk has reduced since last year due to a fall in counterparty exposures.
- Non-Life underwriting risk has decreased as a result of a fall in both earned premium and technical provision exposure as the portfolio runs off. This is offset by an increase in lapse risk as SISE has expected gross future premium.
- Health Risk has decreased as the business runs off. This is expected due to the short-tailed nature of this risk.
- Operational Risk has decreased in-line with falls in all other components mentioned above.

Further commentary on these movements is included in **Section E**.

**Section C** provides further details of the risks which the Company is exposed and how we measure, monitor, manage and mitigate these risks, including any changes in the year to our risk exposures.

### Valuation for solvency purposes

Solvency II requires a market-consistent approach to the valuation of assets and liabilities. A number of assets and liabilities require different valuation methods to those used in the financial statements which are prepared in conformity with the Liechtenstein Generally Accepted Accounting Principles ("LIE GAAP").

The valuation differences are summarised as follows:

Valuation Differences \$000	2022	2021
<b>Assets</b>		
Investments	7	1,494
Reinsurance recoverable	(21,900)	(4,954)
<b>Liabilities</b>		
Technical provisions	4,689	46,160
<b>Total Valuation Differences</b>	<b>(26,582)</b>	<b>(49,620)</b>

The Company's net assets on a Solvency II basis are \$26.6m lower than a LIE GAAP basis. This is a decrease of \$23.0m compared to the prior year.

Valuation differences on investments relate to differences in the Solvency II fair value valuation basis and LIE GAAP lower of cost or market value basis. The excess of the value of investments on a Solvency II basis compared to LIE GAAP has reduced by \$1.5m as a result of the reduction in the size of the investment portfolio.

The excess of the value of net technical provisions on a Solvency II basis compared to their value on an LIE GAAP basis has decreased by \$24.5m to \$26.6m (2021: \$51.1m). This is due to:

- Higher future profits included in premium provisions by \$2.5m (decrease)
- Lower costs of future reinsurance by \$9.0m (decrease)
- Lower expense provision by \$2.0m (decrease)
- Higher impact of discounting by \$6.8m (decrease)
- Lower risk margin by \$4.2m (decrease)

There have been no material changes in the recognition and valuation bases for assets and liabilities under Solvency II over the reporting period.

There have not been any changes to reserving policy and procedures during 2022 or subsequently. The actuarial team recognises the potential for increased uncertainty for estimating premium and

claims due to the reducing size of the portfolio going forward for certain lines of business. The Actuarial team will consider this uncertainty in their selections during run-off.

**Section D** includes information on the valuation basis adopted for each class of assets and liabilities and also provides an explanation of valuation differences arising when moving from the valuation basis used in the Company's financial statements to the Solvency II valuation basis.

### Capital Management

The Company uses the standard formula as prescribed by the Solvency II Delegated Regulation to assess its ability to meet its regulatory capital obligations under normal and stressed conditions.

The Company's solvency position as at 31 December 2022 and the prior year is as follows:

<b>SISE Solvency Position \$000</b>	<b>2022</b>	<b>2021</b>
Eligible Own Funds to meet the SCR	158,576	164,850
SCR	43,273	64,984
<b>Solvency Surplus</b>	<b>115,303</b>	<b>99,866</b>
<b>Ratio of Own funds to SCR</b>	<b>366%</b>	<b>254%</b>

The SCR has decreased by \$21.7m since 31 December 2021, consistent with the run-off of the Company's business. The relative weightings of the risk categories within the SCR are consistent between 2022 and 2021.

The Company's Own Funds eligible to meet the SCR measured on a Solvency II valuation basis decreased by \$6.2 million. The reasons for the decrease are the LIE GAAP loss for the year after tax of \$28.3m offset by a positive movement in Solvency II valuation differences of \$22.1m. In 2022, the Eligible Own Funds to meet the SCR, has been capped due to a restriction on the eligible Tier 2 capital under the EIOPA rules – see **Section E.1.2** for further details.

The Company maintains sufficient capital to exceed both the SCR and the Minimum Capital Requirement ("MCR").

There were no instances of non-compliance with the SCR or MCR during the reporting period or subsequently. Based on projections for the next 3 years (2023-2025), the Company's Own Funds are expected to exceed its SCR and target level of capital over the three years projection period.

**Section E** includes further details of the Company's Own Funds and SCR.

## Section A Business and Performance

### A.1 Business

#### A.1.1 Company Information

SISE is a European public company incorporated in Liechtenstein. SISE has two shareholders: SIBL with 73.74% of the total share capital and SFL with 26.26% of the total share capital. SIBL owns 100% of the ordinary share capital. The shares owned by SFL are non-voting preference shares and therefore SIBL has 100% of the voting rights. SFL is a wholly owned subsidiary of SIBL.

The smallest higher group of companies of which group accounts are drawn up and of which this Company is a member of is SIBL.

The StarStone group of companies which comprises of SIBL and its subsidiaries including the Company ("the Group") is consolidated into Enstar (majority shareholder). At 31 December 2022, Enstar had four reportable segments (i) Run-off (ii) Assumed Life (iii) Investments; and (iv) Legacy Underwriting. The Group is included in the Run-off segments. Further details of the Enstar Group and its operations and entities are available at [www.enstargroup.com](http://www.enstargroup.com).

The Company's supervisor is the FMA, Landstrasse 109, P.O Box 279, 9490 Vaduz, Liechtenstein.

The Company's immediate parent ("SIBL") and ultimate parent's ("Enstar") supervisor is the Bermudan Monetary Authority ("BMA"), BMA House, 43 Victoria Street, Hamilton, Bermuda. Enstar publishes an annual Financial Condition Report ("FCR") prepared on a consolidated basis under BMA rules. For the year ended 31 December 2022 and onwards, this is a single group FCR which also includes the equivalent information for SIBL. Prior to this, SIBL published a separate FCR prepared on a consolidated basis.

At 31 December 2020, SIBL was a Class-4 insurer domiciled in Bermuda. On 8 January 2021, the BMA approved SIBL's application to re-register as a Class 3A insurer with a Class 3B BSCR (capital requirement) reporting requirement.

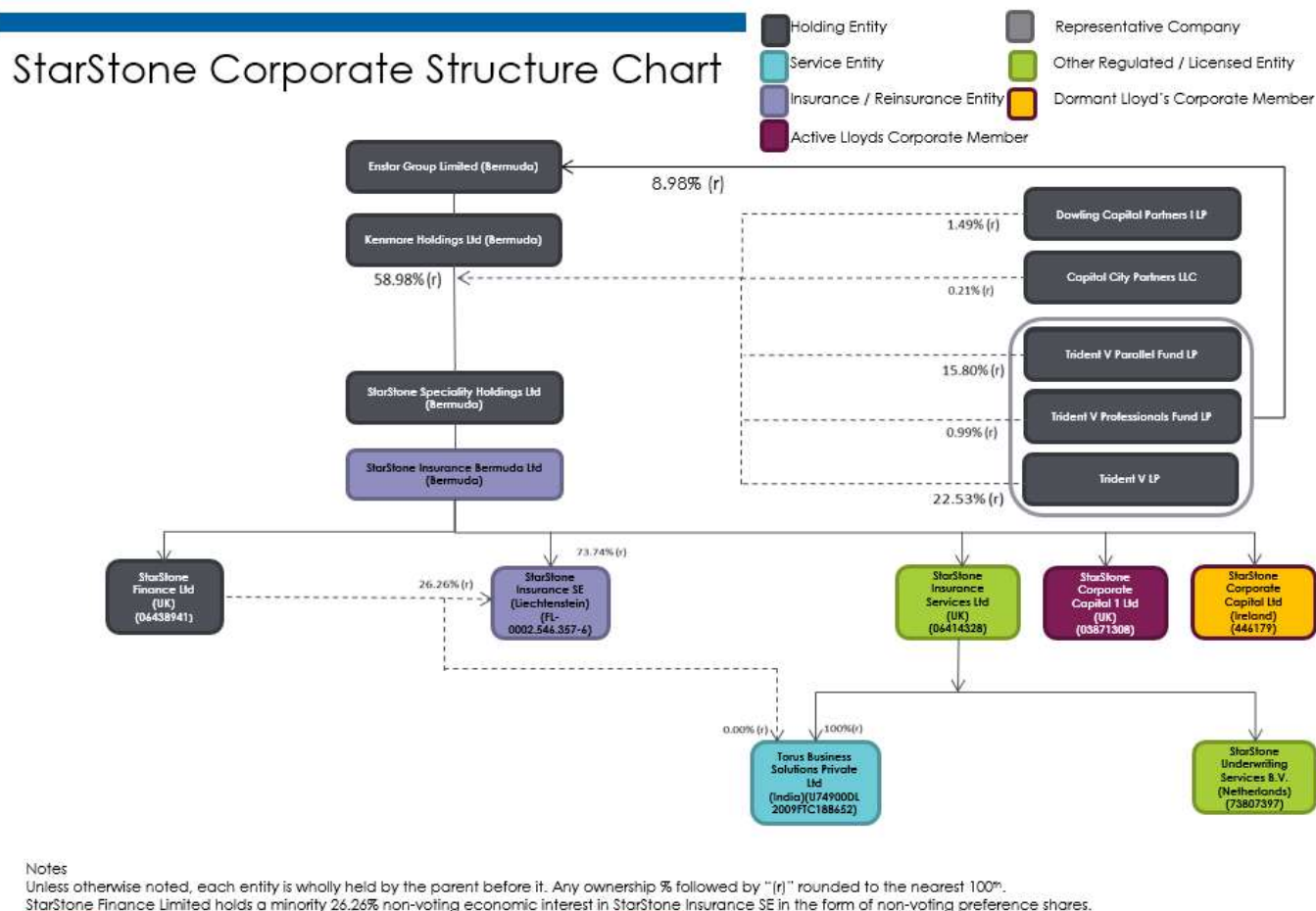
The Company's external auditor is PricewaterhouseCoopers AG, Birchstrasse 160, 8050 Zürich, Switzerland.

The Company's SFCR is available on the StarStone website: <https://www.enstargroup.com/starstone-international>. SIBL's FCR for year endings 31 December 2021 and prior is also available at this link. The Enstar single group FCR for the year ended 31 December 2022, which includes SIBL is available at this link: <https://www.enstargroup.com/corporate-governance>.

SISE and SIBL (together with Lloyd's Syndicate 1301 which SIBL has an economic exposure to) ceased active underwriting in 2020. See **Section A.1.4** below for further information.

## A.1.2 Legal Structure

The Company's ownership structure and the Company's position within the overall StarStone group structure as at 31 December 2022 was as follows:



## 2022 Developments

There were no changes to the ownership structure of SISE during 2022 or subsequent to the year end.

### A.1.3 Business

Prior to the Company's decision to cease active underwriting in 2020, SISE underwrote general insurance business, effecting and carrying out contracts from a network of branches established across the EEA and in the UK and the Head Office. Any active quotes were honoured in accordance with existing terms and conditions and the Company's focus is now on proactively servicing claims on business underwritten. Historically, SISE has primarily underwritten specialty insurance and reinsurance business covering a variety of insureds from large multi-nationals to small and middle-market clients worldwide.

SISE's key classes of business are:

- Marine (Hull, Cargo and Liability)
- Property (Construction and Offshore Energy)
- Casualty (Directors and Officers, Professional Indemnity and Accident and Health)
- Aviation (Airlines and Aviation Products)

Whilst SISE has ceased to actively underwrite, some policies will remain active for several years and will be serviced on the same basis as when the Company was actively underwriting. This mainly applies to the Company's Construction portfolio.

During 2022, the branch network consisted of:

- Milan (Italy)
- London (United Kingdom)
- Embrach, Representative Office (Switzerland) date of deregistration: closed 15 February 2022
- Paris date of deregistration: 4 February 2022

Whilst the Company is not actively underwriting, some policies remain active. Whilst policies remain in force insurance licenses are still required despite the Company being in run-off. The Company is maintaining a local presence, management in Liechtenstein to support our activity and continue to comply with relevant regulatory requirements.

In line with the Company's succession planning presented to the FMA, the integration with The Enstar Group continues. The integration enables the StarStone Group to draw on significant strategic and operational support from its majority shareholders: Enstar Group, a global insurance organisation with \$22.2 billion in assets as at 31 December 2022, and Stone Point Capital LLC, a leading private equity firm.

#### **A.1.4 Key developments during the year**

##### **Succession plan**

Following SISE ceasing to actively underwrite in 2020, a further integration of SISE within the Enstar group took place and the composition of the Management Board changed as part of the succession plan implementation. The succession plan outlined proposed reappointments of Key Function Holders and members of the Management Board due to the departure of several directors.

##### **Branches**

The closure of the Paris branch in France was filed as of 31 December 2021 and the branch was closed on 4 February 2022. The Switzerland representation office in Zurich was closed on 15 February 2022. The London branch in the United Kingdom ("UK") and the Milan branch in Italy are the remaining active branches.

The FMA and the respective local regulators have been notified of the above changes and of the closure of relevant branches. All EEA freedom of service licenses remain unchanged until the definitive closure of the branches.

##### **Internal Reinsurance Arrangements**

The Company's Whole Account intragroup reinsurance arrangement with SIBL on a risk attaching basis will continue to protect the existing policies, any endorsements and business written under binding authorities. The intragroup reinsurance cessions under this agreement vary between 65% and 100% depending on the class of business and the underwriting year. This reinsurance arrangement has been terminated from the 2021 underwriting year onwards.

Details of intra-group reinsurance arrangement are included in **Section C.3.3**.

##### **Brexit**

Since 1 January 2021, the SISE UK Branch was operating within the UK TPR following the end of post-Brexit transition period. The TPR allows EEA-based firms to operate in the UK for a limited period while seeking full authorisation. As the UK branch is not seeking to write business, no application for full authorisation from the PRA was required. The branch continued to operate under the TPR during 2022

and filled an application to transition to the SROR with the PRA and the FCA in the second half of 2022. The application to transition to the SROR was approved with an effective date of 1 January 2023.

Oversight of the branch regulatory status change and on-going engagement with relevant regulators are in place.

#### **Changes in the Board of Directors**

There were no changes to the Board of Directors during the year or subsequent to the year end.

#### **Changes in the Management Board**

Ee Ling Lim (CFO) resigned 5 August 2022

Erik Zunic role ceased 25 August 2022

Mike Heap (CFO) appointed 13 September 2022

## A.2 Underwriting Performance

### A.2.1 Underwriting performance by line of business

The summary of underwriting performance below is presented in accordance with the Solvency II QRT S.05.01 Premiums, claims and expenses by line business and also in accordance with LIE GAAP. A more detailed analysis is provided in Appendix 1 (QRT S.05.01).

2022 \$000	Medical expense	Other motor	Marine, aviation & transport	Fire & other damage to property	General liability	Credit & Surety	Non-prop. Property	Total
Gross Written Premium	(23)	24	4,301	3,282	165	(320)	33	<b>7,462</b>
Net Written Premium	(5)	(0)	63	(1,346)	(78)	(38)	0	<b>(1,404)</b>
Net Earned Premium	(5)	(0)	74	(3,730)	(14)	61	0	<b>(3,614)</b>
Net Claims Incurred	(96)	(146)	(2,051)	9	176	(41)	(2)	<b>(2,151)</b>
Expenses	204	180	7,352	6,478	2,152	236	20	<b>16,622</b>
<b>Underwriting profit/(loss)</b>	<b>(113)</b>	<b>(34)</b>	<b>(5,227)</b>	<b>(10,217)</b>	<b>(2,342)</b>	<b>(134)</b>	<b>(18)</b>	<b>(18,085)</b>
Investment Income and expenses								<b>(6,568)</b>
Other income and expenses reported in the financial statements								<b>(2,694)</b>
<b>Total loss before tax for the period as reported in the Financial Statements</b>								<b>(27,347)</b>
Net Claims Ratio								<b>60%</b>

2021 \$000	Medical expense	Other motor	Marine, aviation & transport	Fire & other damage to property	General liability	Credit & Surety	Non-prop. Property	Total
Gross Written Premium	(510)	3,039	261	11,805	1,280	309	22	<b>16,204</b>
Net Written Premium	2	239	1,295	(2,949)	444	24	0	<b>(946)</b>
Net Earned Premium	760	511	4,810	(55)	2,660	271	0	<b>8,957</b>
Net Claims Incurred	388	(91)	805	3,671	(188)	(87)	1	<b>4,499</b>
Expenses	306	897	2,571	4,475	1,402	462	4	<b>10,117</b>
<b>Underwriting profit/(loss)</b>	<b>66</b>	<b>(294)</b>	<b>1,434</b>	<b>(8,202)</b>	<b>1,446</b>	<b>(103)</b>	<b>(5)</b>	<b>(5,659)</b>
Investment Income								<b>5,636</b>
Other income and expenses reported in the financial statements								<b>(2,914)</b>
<b>Total loss before tax for the period as reported in the Financial Statements</b>								<b>(2,937)</b>
Net Claims Ratio								<b>50%</b>

Investment management expense is included within the 'Expenses' line on the S.05.01 Premiums, claims and expenses by line business QRT and the table above, in compliance with Solvency II reporting requirements, but is presented as 'Investment Expenses' in the Company's financial statements.



The underwriting result of the Company for the year was a net loss of \$18.1m (2021: loss of \$5.7m) which is primarily driven by the servicing of the Company's administrative expenses, realised and unrealised investment losses and foreign exchange loss. The majority of the Company's underwriting results continue to be ceded out to its parent company, SIBL.

The Company's gross written premiums continue to reduce from prior year to \$7.5m (2021: \$16.2m), a result of ceasing to underwrite new and renewal business in June 2020. The Company's gross written premium during the year is mainly generated from premium movements on existing policies and endorsement premiums on Construction business.

As a result of the premium movements during the year, the Company's acquisition costs increased to \$2.9m (2021: \$1.3m). In addition, commissions received fell to \$1.5m (2021: \$3.1m) and the Company's administrative expenses increased resulting in net expenses rising compared to last year

The Company reported an investment loss net of investment management expenses of \$7.2m (2021: \$5.2m) for the financial year. This was due to rising interest rates and widening credit spreads which increased unrealised losses. In addition, realised losses also increased as more investments were sold during the year to fund claims payments.

### A.2.2 Underwriting performance by geographical area

The following information is presented in accordance with the QRT S.05.02 Premiums, claims and expenses by country which reports the home country and the top 5 geographical locations based on gross written premiums. 'Others' underwriting profit includes all other geographic locations not disclosed within the QRT S.05.02.

2022 (\$000)	Liechtenstein	United States	UK	Slovakia	Costa Rica	Netherlands	Other	Total
Gross Written Premium	(6)	5,601	1,241	738	579	515	(1,206)	<b>7,462</b>
Net Written Premium	(1)	3,040	(3,630)	(0)	0	(211)	(601)	<b>(1,403)</b>
Net Earned Premium	(1)	3,056	(3,672)	0	10	(182)	(2,824)	<b>(3,613)</b>
Net Claims Incurred	(322)	(1,403)	730	31	337	(1,032)	(492)	<b>(2,151)</b>
Expenses	(4)	6,288	3,103	281	1,093	576	5,286	<b>16,623</b>
<b>Underwriting profit/(loss)</b>	<b>325</b>	<b>(1,829)</b>	<b>(7,505)</b>	<b>(312)</b>	<b>(1,420)</b>	<b>274</b>	<b>(7,618)</b>	<b>(18,085)</b>

2021 (\$000)	Liechtenstein	UK	United States	Germany	Netherlands	France	Other	Total
Gross Written Premium	3,959	3,265	2,222	1,144	1,068	831	3,716	<b>16,204</b>
Net Written Premium	363	(92)	1,170	(1,176)	(1,550)	796	(458)	<b>(946)</b>
Net Earned Premium	882	(69)	1,892	3,720	(264)	1,449	1,347	<b>8,957</b>
Net Claims Incurred	20	54	593	172	675	(486)	3,470	<b>4,499</b>
Expenses	882	411	588	3,989	1,467	590	2,190	<b>10,117</b>
<b>Underwriting profit/(loss)</b>	<b>(20)</b>	<b>(533)</b>	<b>711</b>	<b>(442)</b>	<b>(2,406)</b>	<b>1,345</b>	<b>(4,313)</b>	<b>(5,659)</b>

As a result of ceasing to underwrite new and renewal business the geographic composition of the portfolio in 2022 has changed compared to 2021.

## A.3 Investment Performance

### A.3.1 Investment income by asset class

The Company's investment income by Solvency II asset class<sup>2</sup> is presented in the table below.

2022 \$000	Interest	Realised gains/losses	Unrealised gains/losses	Total
Government Bonds	545	(828)	(1,465)	(1,748)
Corporate Bonds	1,097	(1,872)	(3,093)	(3,868)
Collective Investments Undertakings	4	29	(31)	2
Collateralised securities	468	(291)	(2,032)	(1,855)
Cash and cash equivalents	48	-	-	48
<b>Total</b>	<b>2,162</b>	<b>(2,962)</b>	<b>(6,621)</b>	<b>(7,421)</b>

2021 \$000	Interest	Realised gains/losses	Unrealised gains/losses	Total
Government Bonds	358	137	(1,322)	(828)
Corporate Bonds	741	306	(1,917)	(870)
Collective Investments Undertakings	(5)	3,252	(3,162)	84
Collateralised securities	300	520	(363)	457
Cash and cash equivalents	(7)	0	0	(7)
<b>Total</b>	<b>1,387</b>	<b>4,215</b>	<b>(6,764)</b>	<b>(1,163)</b>

There has been a significant decrease in the overall investment income driven by an increase in realised losses driven by liquidation of funds to make claims payments during the period. There was also a decrease in unrealised gains/losses which is driven by market performance in the year.

The Company holds the majority of its investments in USD (95%), GBP (1%) and EUR (4%) denominated instruments and in the following proportions.

<sup>2</sup> The figures in the tables above are presented in accordance with the Solvency II QRT S.09.01 Income gains and losses in period. These are different to the figure presented in **Section A.2.1** as under LIE GAAP, investments are valued at the lower of cost or market value.

Financial Investments \$000	2022 SII Fair Value	2022 Proportion	2021 SII Fair Value	2021 Proportion
Government bonds	29,615	30%	87,152	49%
Corporate bonds	39,727	41%	63,815	36%
Collateralised securities	15,343	16%	18,860	11%
Collective Investment Undertakings	3	0%	3,221	2%
<b>Total Investments</b>	<b>84,688</b>	<b>87%</b>	<b>173,048</b>	<b>98%</b>
Cash and Cash equivalents	12,688	13%	4,371	2%
<b>Total Cash and Investments</b>	<b>97,376</b>	<b>100%</b>	<b>177,419</b>	<b>100%</b>

The Company holds 30% of its investment in Government Bonds, 41% in Corporate Bonds and 16% in securitised securities that are predominantly US Agency mortgaged-backed securities (issued by Federal National Mortgage Association ("Fannie Mae"), Government National Mortgage Association ("Ginnie Mae") and ("Freddie Mac").

Investment in government bonds decreased from 49% to 30% due to the liquidation of investments during the year to fund claims payments.

### A.3.2 Gains and losses recognised directly in equity

There were no investment gains or losses recognised directly in the Company's equity.

### A.3.3 Securitised investments

The majority of securitised investments are issued by US Government Sponsored Entities ("GSEs"), including Fannie Mae, Freddie Mac and Ginnie Mae. These securities hold a rating of AAA.

Securitised Investments \$000	2022 SII Fair Value	2022 Proportion	2021 SII Fair Value	2021 Proportion
Fannie Mae	6,123	40%	6,452	34%
Freddie Mac	4,820	31%	5,163	27%
Ginnie Mae	4,400	29%	6,900	37%
Other	0	0%	345	2%
<b>Total Securitised Investments</b>	<b>15,343</b>	<b>100%</b>	<b>18,860</b>	<b>100%</b>

## **A.4 Performance of other activities**

### **A.4.1 Other material income and expenses incurred over the reporting period**

Other income and expenses relate to a foreign exchange loss of \$5.0m (2021: \$2.9m) as the USD strengthened further against GBP, EUR and AUD during the year.

### **A.4.2 Leasing arrangements**

The Company leases offices under non-cancellable operating lease agreements. The rental cost associated with operating leases is charged to the profit and loss account on a straight-line basis over the life of the lease.

SISE is currently the lessor for an operating lease on its Schaan head office.

The operating lease payments recognised as an expense during the year are \$0.4m (2021: \$0.3m). The Company has no lease agreements that include contingent rent. The Company has no finance leases.

## **A.5 Any other information**

### **Post Balance Sheet Event**

There is no material information to be disclosed.

## Section B System of Governance

### B.1 General information on the System of Governance

The Company's system of governance is proportionate to the nature, scale and complexity of the company's activities. The Company has a Board of Directors and Management Board comprised of a combination of independent non-executives and executives. All executives are selected on the basis of their skills, knowledge, competence and experience.

The SISE Board is ultimately responsible for the oversight of SISE's performance and risk management. There is an established system of governance with defined segregation of duties and delegation of responsibilities to various committees reporting to the Board.

The Board holds quarterly meetings and operates within established Terms of Reference. It is provided with appropriate and timely information to enable it to review business strategy, trading performance, business risks and opportunities, solvency and regulatory compliance. At the beginning of 2022, Covid-19 travel restrictions began to ease and the Board, as well as the Management Board, transitioned back to in person meetings from Q2 2022 onwards.

The Board of Directors considers recommendations from the Management Board, relevant committees and executives (within SISE) and any other issues of relevance to the operation of SISE. A number of matters are reserved specifically for decision by the Board. Other matters are delegated to the Management Board which reports directly to the Board, and which is responsible for the day-to-day operation of the company.

In 2023, the Articles of Association will be made explicitly reflective of the two-tier Board structure of SISE.

#### B.1.1 Governance Structure

The Company delegates authority to the Management Board to focus on operational matters. The Management Board delegates to Management Committees established to focus on particular areas with appropriate expertise (e.g., underwriting, claims)

The Company delegated authority to the following Management Committees during the year ended 31 December 2022.

**StarStone Insurance SE Claims Committee:** The SISE Claims committee has delegated responsibility for claims oversight and management and establishes the claims philosophy, policies, procedures within the Company's agreed risk appetite and risk tolerances, supported by the Risk Management and Compliance functions.

**Group NLRO Reserving Committee:** The Committee ensures the Reserve Risk framework is embedded in the business, consistently applied, and ensures that all significant risks have been adequately considered and managed within the parameters of agreed appetite and tolerances.

**UK/EU Management Risk Committee:** The purpose of the Committee is to enhance and embed the Enterprise Risk Management Framework to assist the Company in reviewing and evaluating the risks to which the Company is exposed.

#### **Underwriting Group:**

The Underwriting Group, working closely with the Claims Reserving and Reinsurance Committee (where applicable), is responsible to the Head of Underwriting for the oversight and subsequent execution of the Underwriting Plan of activities for the Company and all other former StarStone entities.

Functional business units report directly to the Board (i.e., the Board retains oversight and responsibility for the Company's activities), via the Management Board.

The governance structure provides for effective decision making by allocation of segregated responsibilities and accountability, which provides for operational independence between functional responsibilities.

### **B.1.2 Key Function Responsibilities**

All key functions are adequately resourced and suitably independent from the business to fully execute their responsibilities.

The Company's key functions are:

- Risk management function – dealing with the risk management and internal control systems
- Compliance function – dealing with legal, regulatory, administration and supervisory compliance
- Internal Audit function – dealing with the evaluation of the adequacy and effectiveness of the internal systems and controls
- Actuarial function – dealing with reserving & capital modelling and associated data
- Finance function – dealing with the financial information and regulatory reporting

The Company ensures that all persons who effectively run the Company or have other Key Functions are fit to provide sound and prudent management through their professional qualifications, knowledge and experience, and are proper by being of good repute and integrity (see **Section B.2**). The key functions organisational charts describe the reporting lines and the level of resources and independence of relevant key functions.

### **B.1.3 Remuneration**

Employees at the Schaap head office are employed directly by the Company with the average number of employees totalling 5.

In addition, the Company has 5 Management Board members that have dual contracts and are contracted to 25% of their time to SISE. The Company's other remuneration costs relate to staff based in the United Kingdom who are employed by EEUL.

The Company's Remuneration Policy is designed to achieve the following:

- To attract, develop and retain the appropriate calibre of staff necessary to deliver the Company's key business strategies;
- To provide employees with a competitive and market-aligned remuneration package which includes remuneration made up of an appropriate balance of fixed and variable components;
- To create a strong positive performance ethic within a risk aware environment;
- To reward achievement of meaningful goals and objectives that are aligned with the Company's business and risk management strategy over both the short and long term whilst considering the performance of the Company as a whole; and
- To reflect the Company's objectives for sound corporate governance and risk management including not to encourage excessive risk-taking and to avoid conflicts of interest.

The Company has considered the EIOPA opinion on the supervision of remuneration principles in the course of the annual review of compensation and when defining remuneration packages.

Additionally in 2022, the Enstar Europe Compliance Assurance team undertook a review in form of a

gap analysis of the design of the remuneration framework to consider whether it meets Solvency II requirements as set out in Article 275. The review found that the framework meets the requirements for SISE as the policy and procedures are:

- Established, implemented and maintained in line with the undertaking's business and risk management strategy, its risk profile, objectives, risk management practices and the long-term interests and performance of the undertaking.
- Cover personnel who have a material impact on the undertaking's risk profile.
- Promote sound and effective risk management and shall not encourage risk-taking that exceeds the risk tolerance limits of the undertaking, including ensuring fixed vs variable/deferred remuneration is appropriate.
- Are clear, transparent and include effective governance and oversight of the remuneration policy that is proportional to the size, nature and complexity of the firm.
- Designed in such a way as to take into account the internal organization of the undertaking, and the nature, scale and complexity of the risks inherent in its business.

The Company's compensation programme for employees and executives (together "staff members") currently consists of two principal elements: fixed and variable remuneration. Staff members may also receive employee benefits, pursuant to their employment agreements.

### **EGL Human Resource and Compensation Committee**

The EGL Human Resource and Compensation Committee (the "Compensation Committee") oversees the Enstar Group's approach to remuneration. The Compensation Committee is comprised entirely of non-executive directors. Human Resources reviews remuneration policies every three-years with changes approved by the Compensation Committee.

### **Fixed Remuneration**

Staff members receive a fixed base salary which is determined primarily based on the role and position of the individual employee, reflecting professional experience, responsibility, job complexity, criticality or scarcity of skills and local market conditions. The fixed component represents a sufficiently high proportion of the total remuneration to ensure that conflicts of interest are avoided and excessive risk taking is not encouraged.

### **Variable Remuneration**

The variable component of remuneration is balanced with the fixed component of remuneration to avoid staff members being overly dependent on the variable component. In addition, staff members (in accordance with local employment law) may benefit from various benefit plans. All variable remuneration amounts are awarded in accordance with performance and there is no minimum payment guaranteed. Variable remuneration may be delivered via the Short-Term Incentive Plan and the Long-Term Incentive Plan.

### **Short-Term Incentive Plan**

Annual Short-Term Incentives paid are influenced by financial, non-financial and individual performance against objectives. Financial measures selected are aligned with Enstar Group strategy and set so as not to incentivise inappropriate risk taking. Non-financial metrics will also have appropriate weighting in the assessment of performance. The Enstar Group risk function provides input into the assessment and may apply downward adjustments to take into account exposure to current and future risks.

### **Long-term Incentive Plan**

Some staff members may be eligible for additional variable remuneration via the Long-Term Incentive Plan. The Long-Term Incentive Plan has a three-year deferral period and is aligned with the nature of the business, the risk appetite and the activities of the employees eligible.

The Company does not operate supplementary pension or early retirement schemes for staff members.



### Recoupment Policy

The Enstar Group has a Recoupment Policy applicable to all staff members. The Recoupment Policy provides that the Enstar Compensation Committee may recoup, or “clawback” cash or equity incentive awards granted after 1 April 2016.

### B.1.4 Material Transactions

The Company has the following material internal reinsurance arrangements.

Counterparty	Underwriting year	2022	2021
Cavallo Bay (Kayla Re)	2016 - 2018	35%	35%
SIBL	2018 and prior	100%	100%
SIBL	2019	80%	80%
SIBL	2020 - 2021	65%	65%

The cession rate for construction line of business is 100% for all underwriting years.

The reinsurance arrangement with SIBL has been terminated for the 2021 underwriting year onwards.

There have been no other material transactions with shareholders during the reporting period.

## B.2 Fit and Proper Requirements

The Company expects all employees to meet the Company's internal and regulatory requirements applicable to their professional qualifications and integrity. The expectations of the FMA in Liechtenstein are set out in the FMA Guideline 2017/18 'Fachliche Qualifikation und persönliche Integrität von Organträgern und Funktionsinhabern'. Further requirements, for individuals undertaking roles for the UK Branch, are derived from the Fitness & Propriety requirements set out in the FCA Handbook by the UK FCA.

The Company adopted the Enstar Fit and Proper Policy and places great importance on ensuring that all individuals fulfilling Key Function roles are fit and proper for their positions. Appendix 1 of the Fit & Proper Policy makes reference to the Liechtenstein requirements in specific as set out in the FMA Guideline 2017/18.

Appendix 1 of this policy applies to the following roles (collectively referred to as "FP roles" in this section):

- Directors, including Non-Executive Directors;
- Senior Managers approved by the PRA or FCA under the UK Senior Managers Certification Regime ("SMCR");
- Individuals Certified by a UK firm under the SMCR; and
- Key Function under Solvency II as implemented by the PRA; the Liechtenstein Financial Market Authority ("FMA"), or other EEA-regulatory supervisor;
- Directors and Appointed Actuary for Liechtenstein regulated entities; and/or
- Directors and other senior manager functions set out by the National Bank of Belgium

The objective of the Fit & Proper Policy is to outline the procedures necessary to ensure that:

- The Company applies an objective and consistent approach to assessing, maintaining and monitoring the fitness and propriety of the "FP roles";
- Individuals undertaking "FP roles" are aware of their responsibilities, and receive appropriate training;
- The Company complies with regulatory obligations regarding fitness and propriety; and
- The Company has full range of skills needed for the effective and prudent management of its business operations.

In accordance with the Fit and Proper Policy, the FP roles are assessed against below outlined criteria in order to be deemed to have the necessary qualities, competencies and experience to perform their duties and carry out their responsibilities in an effective manner. All individuals performing an FP role also require regulatory approval prior to performing their role.

In accordance with our Fit and Proper policy each person carrying out a FP role shall:

- possess the necessary competencies, skills, experience, knowledge, expertise, diligence and soundness of judgement to undertake and fulfil the specific duties and responsibilities of the role;
- demonstrate the appropriate character, competence, honesty and integrity in fulfilling occupational, managerial or professional responsibilities previously and/or in the conduct of their current duties;
- demonstrate sufficient knowledge of and a willingness to comply with legal obligations, regulatory requirements, professional standards and fiduciary obligations;
- be aware of and be able to effectively ensure implementation and compliance with the underlying principles of laws, regulatory requirements and licence obligations applying to the Company; and
- be able to identify and appropriately manage any conflicts of interest, in accordance with the Company's Conflict of Interest policy.

Each person taking up a FP role shall not:

- have (or have been involved with an entity that has) been refused admission, reprimanded, disqualified or removed by a professional or regulatory body due to matters relating to such individuals' honesty, integrity or business conduct;
- have been terminated, resigned or asked to resign from a position as a director or manager or professional service provider to an entity in circumstances which reflected adversely on their honesty or integrity in discharging their responsibilities in that role;
- have been the subject of civil or criminal proceedings or enforcement action, in which such FP role was determined in a final judgment to lack honesty or integrity; or
- have intentionally hindered, obstructed or misled, or failed to be truthful with a regulatory agency.

As an ongoing requirement a Fit & Proper questionnaire is reissued annually by the Office of the Corporate Secretary to all persons performing FP Roles. It is mandatory for this questionnaire to be completed and returned. All matters must be disclosed. All Individuals performing FP Roles must ensure that they are at all times fit and proper persons and continue to meet the criteria set out in the Fit and Proper Policy. If an individual becomes aware of information which could affect the assessment of their fitness & propriety, they must inform HR/Compliance as soon as practicable.

The HR and Compliance functions continuously monitor any staff changes or business activities that could have an impact upon roles and ensure that processes are in place to confirm ongoing fitness and propriety. The Compliance function is responsible for seeking FMA pre-approval for key individuals in accordance with the FMA Fit & Proper procedures.

The Board takes all reasonable steps to ensure that all individuals performing an FP role are aware of and understand, the Fit and Proper Policy as well as their obligation to continue to meet the fit & proper requirements on an on-going basis.

The Fit and Proper Policy is supported by our Code of Conduct setting our behavioural expectations and personal obligations from all our employees, agency workers and contractors. Requirements that are considered as part of the annual appraisal process.

A whistleblowing policy and processes are also in place to support employees, agency workers and contractors to raise concerns, with appropriate safeguard to prevent victimisation. Concerns raised are taken into account to assess members of staff fitness and propriety, where appropriate.

#### **Notification of failure to meet ongoing Fit and Proper Requirements**

Where it has been assessed that an individual holding an "FP role" is no longer fit and proper for a position, the Board of Directors shall take reasonable steps to remove the person from such position as soon as practicable and in the interim, institute necessary measures to mitigate risks associated with the person continuing to hold the position.

## B.3 Risk management system including the Own Risk and Solvency Assessment (“ORSA”)

As noted in **Section B.1**, Risk Management is one of the key functions of the Company's corporate governance.

The main responsibilities of the Risk Management Function are:

- Ensure independent review and challenge of first line activities.
- Develop, maintain, and implement the ERM Framework across the Company.
- Oversee the operation of the ERM Framework, ensuring emerged and emerging risks are identified on an ongoing basis.
- Lead and facilitate the ongoing maintenance of a robust Risk Appetite Framework to provide a holistic view and ongoing assessment of risk for the Executives and Board, guiding and informing enterprise risk management.
- Report to the Board analysis of aggregate risk appetite, risk profile and capital adequacy as part of the ORSA where required.
- Identify, measure, manage and, monitor the risk profile of the Company to inform the decision-making process.
- Ensure high rated risks have appropriate controls which are tested on a frequent basis.
- Conduct comprehensive risk assessments on strategic initiatives.
- Investigate, remediate and (where appropriate) escalate both control failures risk appetite breaches to the appropriate governance forums.
- Establish a proactive risk culture within the Company and provide required risk management training.
- Analyse the SCR and develop the risk profile of, and interactions between, different risk categories.
- Promote the consideration of Environmental (specifically, Climate Change effects), Social and Governance (“ESG”) risks in the business planning and strategic priorities process.
- Oversee, collate and include stress and scenario testing into the wider framework, and where appropriate ensure risk mitigation measures are designed and implemented.
- Perform root cause analysis on reported incidents / risk events (as appropriate).

Effective risk oversight is a priority for the Company Board and the Company strongly emphasises facilitating the operation of a robust ERM Framework to identify, measure, manage, monitor and report risks that affect the achievement of all strategic, operational, and financial objectives.

The overall objective of the ERM Framework is to:

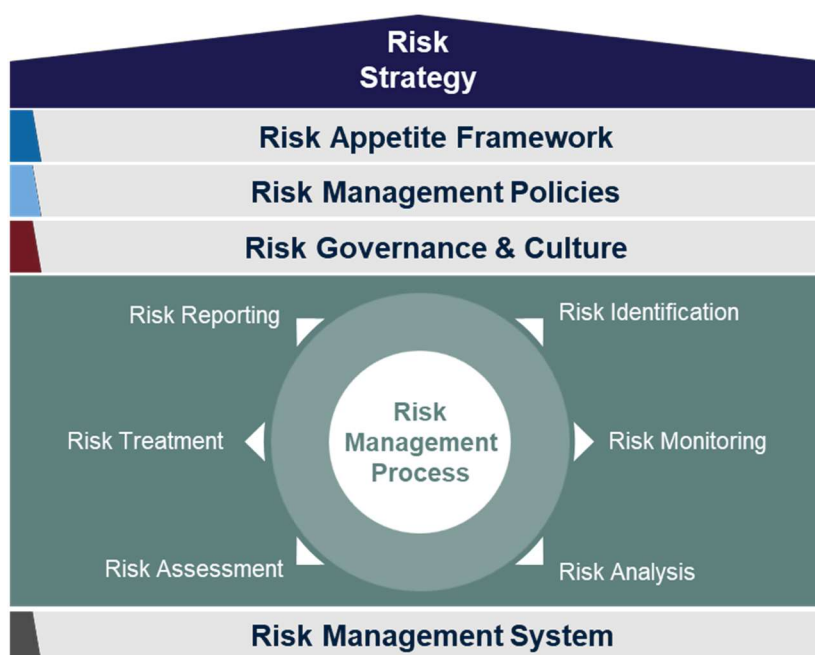
- Support the achievement of business strategy and objectives in accordance with the Board approved risk appetite.
- Ensure appropriate methods for the identification and mitigation of risk are in place and operating as intended.
- Support good risk governance, responsibility, and accountability.
- Ensure a consistent approach to risks management is embedded within the Company.

The Company uses its risk management capabilities in a strategic context to support the following three activities related to its operations:

- Identify, assess, and measure risks to understand value creating and value destroying risks and their associated risk levels for the purpose of capital allocation and business planning.
- Establish a risk appetite and underlying risk tolerances for key risks undertaken for the purpose of maintaining and controlling risk levels to be aligned to the Group's business strategy.
- Monitor and report risk levels to evaluate the Company's performance and appropriateness of the business strategy.

The overarching principle of the ERM Framework is to ensure the Company appropriately assesses and manages risk as it continues to take opportunities to meet its business objectives.

The ERM Framework and its key components are outlined in the schematic below:



### Risk Strategy

The main components of the Company's Risk Strategy are:

1. To support business objectives by ensuring appropriate solvency levels, liquidity and capital management.
2. To ensure that an appropriate risk management framework and system of internal control is maintained according to policies agreed by the SISE Board of Directors.
3. To secure appropriate reinsurance coverage, as needed, at a cost that is acceptable to the SISE Board of Directors.
4. To oversee the business conduct of SISE in accordance with best practice and applicable regulations.
5. Promote the consideration of Environmental (specifically, Climate Change effects), Social and Governance ("ESG") risks in the business planning and strategic priorities process.

Several key principles underpin the design of the Company's Risk Management Strategy. These are that Risk Management is:

- an integral part of the organisational processes
- part of decision making
- addresses uncertainty
- systematic, structured and timely
- based on best information
- tailored
- transparent and inclusive
- dynamic, iterative and responsive to change
- facilitating / driving continual improvement, and
- focused on protecting the Company's stakeholders and policyholders.

The Company's Risk Management Strategy enables the proactive management of risks arising in day-to-day operations, primarily through the implementation and maintenance of an effective ERM framework to ensure a robust control environment.

## Risk Appetite Framework

The Company's Risk Appetite Framework ("RAF") monitors the Company's risk taking by linking business strategy and planning with available capital and risk. It outlines the amount of risk that the Company is willing to accept based on the Company's shareholders' equity, capital resources, potential financial loss and other risk-specific measures. The framework is designed to:

1. Monitor and protect the Company from an unacceptable level of loss, compliance or operational failures and adverse reputational impact.
2. Support the wider strategic decision-making process.

A qualitative risk appetite statement is set for each material risk and is supported by quantitative tolerances which align to the Company's business plan. The RAF is reviewed and approved by the Board annually or as determined by the Board outside the annual review cycle in the event of a material change.

Accountability for the implementation, monitoring, and oversight of the RAF is aligned with individual corporate executives and monitored and maintained by the Risk Management function. Risk tolerance levels are monitored and any deviations from pre-established levels are reported to the Board via the quarterly risk report to facilitate responsive action or acceptance of the evolving risk profile.

## Risk Management Policy

The Company maintains several Risk Management Policies which are:

1. To proactively and consistently identify, assess, and manage risks across operations.
2. To manage risks within the limits of the Company's prescribed risk appetite and as directed by defined corporate policies.
3. To notify the Board, where events may have, or are likely to, breach risk appetite.
4. To complete annual review of the policies and obtain Board approval.

## Risk Governance

The Company uses the "Three Lines" model as illustrated below:

	1 <sup>st</sup> Line	2 <sup>nd</sup> Line		3 <sup>rd</sup> Line
	Business	Risk Management	Compliance	Internal Audit
Responsibilities	<ul style="list-style-type: none"> <li>• Take measured risks commensurate with process and outcome whilst upholding responsibility for <b>day-to-day risk management</b>.</li> <li>• Identify and monitor risks as well as implementing <b>mitigating actions</b> and effectively operating internal controls to manage risk.</li> </ul>	<ul style="list-style-type: none"> <li>• Assist risk owners in <b>defining the target risk exposure, setting risk appetite</b> and mitigating emerging issues</li> <li>• Implement the <b>Enterprise Risk Management 'ERM' Framework</b></li> <li>• Provide <b>independent monitoring of risk</b> by comparing actual risk level to risk appetite</li> </ul>	<ul style="list-style-type: none"> <li>• Monitor the <b>accuracy and completeness</b> of compliance with laws, regulations, and internal policies</li> <li>• Advise on <b>compliance</b> with emerging laws, regulations and internal policies</li> <li>• Regularly report on <b>compliance risk</b> or exposure to penalties and/or breach to the Board</li> </ul>	<ul style="list-style-type: none"> <li>• Uphold <b>independence and maintain primary accountability</b> to the audit committee governing body</li> <li>• Provide assurance on the <b>design and effectiveness</b> of the governance, risk and control frameworks</li> <li>• Provide assurance <b>recommendations</b> and remediation</li> </ul>

The first line consists of Senior Corporate Executives and their function leaders and risk owners. They are accountable for executing the risk management strategy. They are responsible for the appropriate management of the activities and conduct of the business functions and for ensuring that staff understand the business strategy, risk mitigating policies, and procedures and have in place personal objectives focused on achieving these.

The second line comprises Risk and Compliance. The Risk Management function reports to the Board and focuses primarily on facilitating an efficient, effective, and consistent approach to risk management. The management assurance is further complemented by the Compliance function which seeks to mitigate regulatory compliance risks and ensures that appropriate, effective, and responsive compliance services are available to the business units across the Company.

The third line comprises Internal Audit which independently reviews the effectiveness of the ERM Framework. The results of audits are monitored by the Board. Independent assurance from external Auditors also sits within our third line of defence. Adopting this framework ensures appropriate

ownership of the risk from the business and allows for sufficient challenge from the second and third lines.

### Risk Management System

The Risk Management team has a system in place to record key ERM related data, such as risk and control assessments.

### Emerging Risk Management

Emerging risks are defined as 'risks which may develop, or which already exist but are difficult to quantify.' They are marked by a high degree of uncertainty. Emerging risks are not fully understood or explicitly considered within the day-to-day operations of the business given a lack of quantifiable data. Emerging risks can be expected to crystallise over time and therefore merit further analysis, assessment, monitoring, evaluation and, when appropriate, treatment.

A four-step process is in place for managing emerging risks:

- **Identify:** All employees within the Company, the Risk Management Function and Risk Committees have responsibility for the initial identification of emerging risks which have the potential to have a financial, reputational and/or regulatory impact.
- **Analysis:** Risk in conjunction with any identified Subject Matter Experts ("SMEs") have ongoing responsibility for ensuring emerging risks are analysed on an ongoing basis for their relevancy to the business, as well as their impact and speed of emergence.
- **Assessment:** Emerging risks, once evaluated and adequately assessed, can be added to either the emerging risk or Company risk register. Outputs from emerging risk assessments are included within the quarterly risk report.
- **Treatment:** Treatment plans are developed for emerging risks where required with a project lead assigned for completing the associated actions.

### ORSA

In order to demonstrate appropriate solvency and sound risk management strategies on both a current and forward-looking basis, the ORSA framework incorporates assessment of the following:

Area	Annual Business Processes	Quarterly Business Processes
Current Risk Profile	<ul style="list-style-type: none"> <li>▪ Strategy Setting &amp; Business Planning</li> <li>▪ Risk Appetite / Tolerance Setting</li> <li>▪ Risk Identification &amp; KRIs</li> </ul>	<ul style="list-style-type: none"> <li>▪ Risk Appetite/Tolerance Monitoring</li> <li>▪ Risk Identification, Assessment &amp; Monitoring</li> <li>▪ Emerging Risk Identification, Assessment and Management</li> <li>▪ Internal Control Assessment &amp; Monitoring</li> </ul>
Capital Requirements & Solvency	<ul style="list-style-type: none"> <li>▪ Review of deviations of assumptions between the Internal Capital Model ("Own View of Capital Requirements") and the current risk profile.</li> <li>▪ Comparison of relevant Regulatory (Solvency II calculation), Rating Agency and Economic Capital measures to determine risk coverage appropriateness and solvency.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Available Funds and Solvency Assessments—</li> <li>▪ Review of compliance with relevant Regulatory Capital Requirements</li> <li>▪ Technical Provisions Assessment &amp; Monitoring, including compliance with requirements</li> </ul>



Forward Looking Assessments	<ul style="list-style-type: none"> <li>Strategic opportunity assessment</li> <li>Available Funds Projections</li> <li>Capital Management / Liquidity Contingency Planning processes</li> </ul>	<ul style="list-style-type: none"> <li>Ad-hoc, as necessary (e.g. at the time of Transactions)</li> </ul>
Stress & Scenario Testing	<ul style="list-style-type: none"> <li>Sensitivity analysis</li> <li>Stress &amp; Scenario Analysis</li> <li>Reverse Stress Testing</li> </ul>	<ul style="list-style-type: none"> <li>Ad-hoc, as necessary (e.g. at the time of Transactions)</li> </ul>

Through an iterative process of information gathering, output and use, the Company seeks to develop the ORSA to support its strategic plans and objectives within the context of a consistent and Company-wide view of the potential risks and solvency impacts and the Company's appetite and tolerance to assuming such risks.

The ORSA process and report are an integral part of the business planning cycle; providing an assessment of the key risks associated with the plan. They also provide the corresponding solvency capital requirements for the short and long term. The ORSA process and report set out the Company's forward-looking risk profile and risk drivers and considers them against the Company's risk appetite and the capital resources required to support current and emerging risks.

The ORSA process itself involves a combination of processes through which the Board satisfies itself that the Company has appropriate capital (or plans for managing capital) to support the business and its risks on a forward-looking long-term basis and has adequate credible processes for managing risks. The ORSA process and report demonstrates to the Board that the risk profile and risk-based capital position of the Company is clearly reflected and understood and that the results have been validated.

The ORSA policy sets out the process for determining its capital needs linked to its risk profile. The Company's significant risk exposures are discussed in **Section C (Risk Profile)**. The risk profile is determined by the Company with the assistance of the Risk Management function and is recorded in the Risk Management system. The Company uses the Standard Formula in line with regulatory requirements and includes the results in the ORSA report. An analysis of the Standard Formula SCR by risk category as at the year-end is shown in **Section E**. An appropriateness exercise is performed on the main capital drivers to ensure that risks are considered alongside, capital and the appropriateness assessments. A forward-looking assessment of both the capital measures is made and actual performance is compared with forecasts over time.

The ORSA process operates continuously throughout the course of the business year and ORSA reports are produced on an annual and ad hoc basis:

- A full annual ORSA report is produced in line with the annual business planning process and the setting of regulatory capital. The ORSA report will be provided to the Company Board on at least an annual basis.
- Continual ad hoc ORSA reporting – following the occurrence of a trigger event (a major loss event or significant change to the risk profile), the ORSA processes are performed to assess the impact of the event on the risk profile and capital and solvency position. The ORSA processes performed will be proportionate to the significance of the trigger event and may result in an ad hoc ORSA report.



SISE's UK Branch was operating within the UK TPR following the end of post-Brexit transition period on 31 December 2020. An application has been filed in July 2022 to the PRA to change to the SROR, which has been approved with effective date 1 January 2023. Branches operating within the TPR and SROR are required to comply with the same regulatory requirements that apply to UK third country branches, with both quantitative and qualitative reporting requirements applying for the year ended 31 December 2022.

The UK branch is required to file an ORSA to the PRA for the UK Branch for the year ended 31 December 2022. As such, similar to 2021, the ORSA for the year ended 31 December 2022 will have a dual structure incorporating both quantitative and qualitative information on SISE as a legal entity and the UK Branch-specific information. The annual dual-structured 2022 ORSA will be approved by the Board in May 2023 for submission to the FMA and PRA and is not a public document.

### **Standard Formula Appropriateness**

Standard Formula appropriateness is reviewed annually in conjunction with the ORSA production. Standard Formula appropriateness is evaluated by SMEs, along with Risk Management and Compliance.

To ensure each risk area is considered equally, meetings and detailed reports are produced for each risk area (i.e., Insurance Risk, Counterparty Default Risk, Investment Risk and Operational Risk). A separate report has also been produced for risks explicitly not covered by the Standard Formula (e.g., Liquidity Risk).

The analysis of each area includes qualitative comparison of the risks on the Company's risk register and those explicitly included in the Standard Formula assumptions.

The Company has not identified any material risks that it considers are not fully included in the Standard Formula SCR calculation.

### **Stress and Scenario Analysis**

Integral to the business planning process is the performance of stress and scenario testing around key strategic and business plan assumptions.

The Company maintains a suite of stress scenarios capturing key data and rationale points, which are subject to review for continuing appropriateness as part of the business planning and ORSA process. This suite of scenarios is reviewed by Risk Management.

The Company uses a variety of methods to undertake such analysis:

- Stress tests which shift the values of individual parameters that affect the financial position of the Company and determine the effect on its business;
- Scenario analysis which builds a wide range of parameters that are varied at the same time. Scenario analyses examines the impact of extreme events on the Company's financial position;
- Reverse stress testing assesses scenarios and circumstances that would render the business model unviable. The Company defines unviability as when the Company can no longer meet its obligations or when the projected business plan targets cannot be met. This will not necessarily be the point where the business runs out of capital entirely; and
- High level, forward-looking scenarios which consider the impact of events on a multi-year basis (e.g., from 2023 to 2025). These are typically based on less severe scenarios than are used for stress and scenario testing.

The Company has a defined approach to the development of scenarios, which is coordinated by the Risk Management Function who work closely with business risk owners and subject matter experts to identify scenarios and assess their impact and likelihood.

Assumptions, controls, potential mitigating actions and potential future management actions that could be taken in response to each scenario are also considered. A range of scenarios are considered in the ORSA across all major risk categories.

Based on projections for the next 3 years (2023-2025), the Company's own funds are expected to exceed its SCR and target level of capital over the three-year projection period. SISE's solvency position is sensitive to the credit rating of SIBL due to internal reinsurance arrangements with SIBL and mitigating actions may be required if SIBL were to be downgraded to below BBB.

## B.4 Internal Control System

The Company's internal control framework consists of the entirety of policies, procedures and measures in place enabling the appropriate delivery of the Company business model with appropriate oversight from the Board of Directors. The Board sets policies standards supported by underlying procedures and processes. The latter are owned by the relevant business units and support the oversight and reporting on the business model delivery. The reporting to the Board is supported by Board approved risk appetites. Forming part of the Company's group control environment, internal controls are assessed by control owners on a quarterly basis in terms of design and operational effectiveness.

The Company's Internal Control Policy follows the Committee of Sponsoring Organizations of the Treadway Commission ("COSO") Framework 2017. In addition, the Company has adopted Enstar's standards including a comprehensive Sarbanes-Oxley ("SOX") framework of financial controls for external financial reporting. The responsibility for ensuring SOX compliance is assumed by the Company's CFO. Where control weaknesses or failings are identified, remedial actions are defined and their completion monitored through the subsequent quarterly risk assessment facilitated by the Risk Management Function.

The Company has an effective internal control environment. Key Functions are required to document their operational procedures, and all relevant controls. These are reflected on the Company's risk management tool supporting the quarterly risk and control self-attestation process. The Internal Audit function assesses the effectiveness and completeness of our internal control framework on a risk-based basis.

On an annual basis, Management attests to both the design and operation effectiveness for all controls tested as part of the annual SOX 404 assessment program. This also follows the objectives and components set out within the COSO Framework 2017. The Board receives quarterly reports outlining control deficiencies noted as part of the controls testing program and where relevant an assessment of the aggregated impact these deficiencies on the Financial Statements.

## B.5 Compliance function

As noted in Section B.1, Compliance is one of the key functions of the Company's system of governance.

The Compliance function is responsible for monitoring compliance with laws and regulations pertaining to integrity, conduct, prudential regulation, financial crime, data privacy, and related internal policies and advising thereon. A Compliance framework has been developed for ensuring compliance in these areas, aligned with the Company's regulatory risk appetite.

As a 'second line' function in the Company's three lines model, the Compliance function has responsibility for overseeing and supporting the 'first line' functions to manage the Company's regulatory risk within risk appetite. The Compliance Function supports the business through:

- Establishing and maintaining the compliance universe;
- Identifying and reporting on new and revised regulations or other regulatory developments;
- Identifying and assessing risks stemming from these regulations;
- Advising how to comply with new, existing and changes to regulations;
- Compliance policy setting and implementation;
- Investigating compliance breaches;
- Compliance risk monitoring and testing of key compliance risk controls; and
- Periodic and ad hoc internal and regulatory reporting

Whilst maintaining its independence, the Compliance Function works closely with all business divisions to provide prompt and effective advice, support and assurance. The Compliance Function also has primary responsibility for managing regulatory communications and reporting.

The SISE Compliance Function is supported by the wider Enstar Group Compliance Function. The Head of Compliance is responsible for making sure that the function is sufficiently resourced, or has access to resources, and the necessary expertise, to fulfil its remit.

The Board is responsible for ensuring that adequate measures are in place to manage compliance matters. Compliance is a standard agenda item at each quarterly Board meeting and monthly Management Board meeting. Annually, the Compliance function submits to the Board a Compliance Plan for approval. The plan is flexible and where necessary will be adjusted during the year.

The Compliance Function is entitled to complete unrestricted access to all first line activities. This includes access to all books, records, and other information as required to carry out the activities.

## B.6 Internal Audit function

The Company's Internal Audit function is provided through the Group function and overseen by the Group Head of Internal Audit. The Group Head of Internal Audit has specific responsibility for leading the Internal Audit function for the Group and the provision of independent and objective assurance to the Enstar Group's Audit Committee, subsidiary Boards and senior management. This is a prescribed Key Function under Solvency II.

### Scope of Responsibilities:

- To review, assess and report on the adequacy and effectiveness of the organisation's internal risk management and control environment through audit review and consultancy work and assist the SISE Board in discharging its responsibilities;
- To liaise with the external auditors to foster a co-operative and professional working relationship, optimise audit coverage while as far as possible avoiding the duplication of audit efforts; and
- To assist in enabling the Enstar Group Chief Executive Officer and Chief Finance Officer in discharging their Solvency II and SOX responsibilities through review and testing of key control activities.

The Internal Audit function has full and unrestricted access to any and all of Enstar Group records, physical properties, and personnel relevant to any function under review. Internal Audit activities are free of influence by any element in the organisation, including matters of audit selection, scope, procedures, frequency, timing, or report content to permit maintenance of an independent and objective mental attitude necessary in rendering reports.

Internal Audit ensures that appropriate controls are in place such that conflicts of interest do not arise. Internal auditors have no direct operational responsibility or authority over any of the activities they review. Accordingly, they do not develop nor install systems or procedures, prepare records, or engage in any other activity which would normally be audited.

Annually, the Internal Audit Function submits to the SISE Board an internal audit plan for approval that takes into account all activities and the complete system of governance. The audit work schedule is developed based on a prioritisation of the audit universe using a risk-based methodology. The plan is flexible and where necessary additional reviews may be added during the year.

The Internal Audit function annually assesses whether the purpose, authority, and responsibility, as defined in its charter, continue to be adequate to enable the internal auditing activity to accomplish its objectives. This is completed in the form of an annual review of the Internal Audit function against the IIA Definition of Internal Auditing, the Code of Ethics and the Standards. An external review of the Internal Audit function is completed at least once every five years by an independent body.

The Group Head of Internal Audit is responsible for making sure Internal Audit is sufficiently resourced, or has access to resources, to fulfil its remit and that Internal Audit accesses the expertise necessary to undertake work in respect of specialist business functions. Internal Audit ensures that work is conducted with due professional care.

## B.7 Actuarial Function

The actuarial function comprises of two core teams: 'Reserving' and 'Capital Modelling'. Activities are coordinated by the Actuarial Function Holder and external reviews are conducted as required.

The actuaries that comprise the actuarial function are fellows/students of The Institute & Faculty of Actuaries (or equivalent) and operate under the standards set out by The Institute & Faculty of Actuaries and the UK Financial Reporting Council (or equivalent).

The key activities undertaken by the actuarial functions are as follows:

- Set the reserves and perform regular reserve reviews (on both a LIE GAAP and Solvency II basis).
- Assess the appropriateness of technical provisions methodology and assumptions used.
- Setting methodologies and ensure consistency of use.
- Ensuring that data quality and information technology systems meet the required standards.
- Undertake the standard formula calculation and validation of the standard formula appropriateness.
- Provide an opinion on the underwriting policy and the sufficiency of SISE's premium income to meet the ongoing costs of claims and expenses. The scope of this opinion is significantly reduced following the decision to cease underwriting new and renewal business.
- Provide an opinion on the reinsurance policy of SISE based on existing cover purchased and plans for future purchases as detailed in the business plan. Similarly, to the underwriting opinion the scope here is also significantly reduced since ceasing to write new and renewal business.

An actuarial function report containing the Actuarial Function Holder's opinions, recommendations and key activities is prepared and provided to the Board of Directors and the Management Board annually.

The Enstar Actuarial team has provided actuarial support to SISE since entering run-off. We do not anticipate any material changes to actuarial policy and procedures. The actuarial team recognises the potential for increased uncertainty for estimating premium and claims due to the reducing size of the portfolio going forward for certain lines of business. The actuarial team will consider this uncertainty in their selections during this period.

## B.8 Outsourcing

The Board considers this to be the most cost-effective means of delivering high quality support operations to the Company's activities, accessing the right level of expertise and allows management to focus to a greater extent on the business' core activities. The outsourcing of certain functions is a central feature of the business's operating model. The business recognises the increased operational risk inherent in outsourcing and seeks to mitigate this risk by implementing strong management oversight based on each individual outsourced arrangement risk profile. The outsourcing assessment considers the level of risk based on the type of outsourcing, size of the activity being outsourced and the third party's size and scale.

The Outsourcing Policy defines a set of risk-based expectations and processes (including composite risk assessments) through which suppliers and outsourced service providers are initially identified, assessed (due diligence process), ultimately selected and overseen. Approval processes in place are based on the materiality of the outsourcing being considered. Once a provider is selected, the risk assessment performed during the selection process determines the extent of the ongoing monitoring programme performed by the business. The Vendor Operation team is responsible to oversee some outsourcing and other are overseen by the business depending on the most appropriate oversight approach. Contingency and exit plans are developed for material outsourcing.

The Company's Compliance team oversees all outsourcing matters for the Company.

The main outsourcing agreements are with EEUL, and SISL, both UK based associated entities, providing staff to the company's branches and services such as IT services. EEUL also provide the following services:

- Treasury
- Investments
- Tax
- Actuarial Reserving
- Vendor Operations
- Human Resources
- Internal Audit
- Claims management
- Endorsement activity

Further outsourcing agreements include:

- Investment Management activities (service provider is based in the UK)
- Binding Authorities/Coverholder Agreements, albeit all agreements expired in 2021 due to non-renewal or cancellation
- Claims management for specific countries / claims to various Third-Party Agent's ("TPA's") (service providers are based in different countries)

Outsourcing arrangements are notified to the relevant regulators as per local requirements.

## B.9 Any other information

### Adequacy of the System of Governance

The Board is responsible for establishing an appropriate System of Governance. This has been carried out through discussions with internal and external parties (including the regulator/supervisor). The current system of governance arrangements is considered proportionate to the nature and complexity of the business.

A Board Effectiveness Review is conducted on an annual basis. This review focusses on the following areas:

- Structure, composition and leadership of the Board;
- Formal oversight arrangement, records and responsibilities – including performance management;
- The development of business strategy;
- Culture and values;
- Board and Committee decision-making;
- Risk management, conflicts management and regulatory principles;
- Quality, purpose and distribution of Management Information;
- The overall effectiveness of the Board in terms of its involvement in decision-making, development evaluation and process for appointments to the Board; and
- Board supervision of key functions.

Recommendations are documented following the review and an action plan implemented with actions being labelled as high, medium or low priority. In view of the integration of SISE into Enstar group, a review of the key Company policies is being undertaken.



## Section C Risk Profile

The Company's ERM Framework aligns risk measurement with capital in order to provide a consistent approach for the separate risks and allows the risk profile to be the driver of the solvency and any own economic capital requirements. Where risk is considered to be excessive, the Company may mitigate that risk. A key mitigating factor is the purchase of reinsurance which is used to reduce exposure to Underwriting risk.

The Company's business model and risk profile has evolved in recent years as a result of the decision to stop writing new and renewal business, offset by the greater retention of risk due to lower whole account quota share cession rate. The risk profile is grouped into the SII risk types. Due to the Company's business the concentration profile is dominated by market, credit, and underwriting risk. See **Section E.2** and QRT S.25.01 for an analysis of the SCR by SII risk category.

EOPA correlation matrices from the Standard Formula are used for determining and calculating existing dependencies between the risk modules to calculate the SCR.

### C.1 Underwriting Risk

#### C.1.1 Risk description

In accordance with Article 105 of the Solvency II Directive, underwriting risk is defined as 'the risk of loss or of adverse change in the value of insurance liabilities, due to inadequate pricing and provisioning assumptions.' Underwriting risk is the risk that insurance premiums and/or reserves are ultimately insufficient to fully settle claims and associated expenses.

Underwriting risk spans many aspects of the insurance operations, including premium risk and risk associated with reserving assumptions. Underwriting risk relates to the inherent uncertainty as to the occurrence, amount and timing of insurance liabilities that have been assumed through the underwriting process. As referenced elsewhere previously, new underwriting has been discontinued, though there remains continued oversight of management of the underwriting portfolio. Exposure levels are monitored across all risk categories in line with the approved risk appetite thresholds.

Premium Risk is the risk that policy terms, premiums and reinsurance protection will not be sufficient to cover ultimate loss and expense costs and achieve target rates of return.

Reserving risk is the risk that a Company's reserves are not sufficient to cover its unpaid loss and loss adjustment expense costs. The estimation of reserves is subject to uncertainty because the ultimate cost of settling claims is dependent upon future events and loss development trends that can vary with the impact of economic, social, and legal and regulatory matters.

#### C.1.2 Risk management / mitigation

The Company strives to mitigate underwriting risk through controls and strategies including the purchase of reinsurance, ensuring underwriting authority limits and guidelines are adhered to for the duration of contract terms. Appropriate controls and procedures are in place and monitored for on-going operational effectiveness to ensure that residual risk is maintained within approved risk appetite.

The purchase of reinsurance plays a pivotal role in the mitigation of Underwriting risk. Details of internal reinsurance arrangements entered during the year are included in **Section C.3.3**. Sufficient underwriting expertise has been retained to support the Construction book which has a longer tail with endorsements to be processed and a small, centralised, team to handle all other risk categories for endorsements or queries.

While new underwriting has been discontinued within the Company, there has been an improved review process relating to any premium adjustments and movements, with material premium movements requiring additional sign off from EEUL.

### **C.1.3 Risk exposure / concentration**

In some business lines, the Company is exposed to multiple insured losses arising out of a single peril, such as a natural catastrophe event (for example, a hurricane, windstorm, tornado, flood, or earthquake) or a man-made event (for example, war, terrorism, airplane crashes and other transportation-related accidents, or building fires). The Company models and manages its individual and aggregate exposures to these events and other material correlated exposures in accordance with its risk appetite. The modelling process utilises a major commercial vendor model to measure these exposures. The incidence, timing and severity of catastrophes and other event types are inherently unpredictable, and it is difficult to estimate the amount of loss any given occurrence will generate. Accordingly, there is material uncertainty around the Company's ability to measure exposures, which can cause actual exposures and losses to deviate from initial estimates. As noted in **Section C.1.2** above reinsurance plays a pivotal role in mitigating this risk.

The Company continues to assess and monitor our exposures and accumulation to catastrophe risk on a regular basis underpinned by an appropriate Reinsurance programme. Since we have been in run off for several years now and no longer accept new risk, the live policy count is significantly reduced. We only agree to contractual increases in exposure and no more, hence the picture constantly improves over time.

The Company records premium income by both underwriting class of business and risk location. An analysis of premiums by geographical area shown in **Section A.2.2**.

There were no material changes during the financial year in the Company's underwriting risk exposures. The Company's decision to discontinue underwriting as from June 2020 resulted in reduced premium volume from the 2020 underwriting year onwards and therefore reduced associated underwriting exposures. Conversely, the unexpected nature of COVID-19 related underwriting exposures presents some uncertainty with regards to final loss estimates although these are mitigated by reinsurance in place.

### **C.1.4 Stress and sensitivity analysis**

The liabilities established could be significantly lower or higher than the ultimate cost of settling the claims arising. This level of uncertainty varies between the classes of business and the nature of the risk being underwritten and can arise from developments in case reserving for large losses and catastrophes, or from changes in estimates of claims incurred but not reported ("IBNR").

A five percent increase or decrease in total net best estimate technical provisions (before risk margin), which is considered reasonably possible, would have the following effect on the Company's own funds:

Underwriting Risk Sensitivity - 2022 \$000	5% increase	5% decrease
Medical Expense	89	(89)
Other Motor	50	(50)
Marine, aviation and transport	739	(739)
Fire and other damage to property	1,534	(1,534)
General liability	1,137	(1,137)
Credit and suretyship insurance	63	(63)
Non-proportional property reinsurance	84	(84)
<b>Total</b>	<b>3,696</b>	<b>(3,696)</b>

Underwriting Risk Sensitivity - 2021 \$000	5% increase	5% decrease
Medical Expense	106	(106)
Other Motor	66	(66)
Marine, aviation and transport	932	(932)
Fire and other damage to property	2,595	(2,595)
General liability	1,407	(1,407)
Credit and suretyship insurance	92	(92)
Non-proportional property reinsurance	86	(86)
<b>Total</b>	<b>5,284</b>	<b>(5,284)</b>

A description of the stress and scenario testing performed by the Company around key strategic and business plan assumptions is included in **Section B.3 and C.7.1**.

## C.2 Investment/Market Risk

### C.2.1 Risk description

Market risk is the risk of loss resulting from underperforming investment returns, dilution of invested capital, or adverse financial market movements (such as interest rates or exchange rates). Market risk captures the risk that the fair value or future cash flows of a financial instrument or investment will fluctuate because of changes in market prices. The market risk module shall reflect the risk arising the level or volatility of economic variables which have an impact upon the value of the assets and liabilities of the Company. It shall properly reflect the structural mismatch between assets and liabilities, in particular with respect to the duration thereof.

Market risk may be triggered by multiple economic, political, and regulatory factors such as recessions, political upheavals, structural changes or regulatory changes. Additionally, Market risk may be amplified by excessive concentration and exposure to individual securities, asset types, or asset and fund managers through relative movements in the underlying valuations of the assets).

### C.2.2 Risk management

The Company manages Market risk in a number of ways, including use of investment guidelines; regular reviews of investment opportunities; market conditions; portfolio duration; oversight of the selection and performance of external asset managers; regular stress testing of the portfolio against known and hypothetical scenarios; established tolerance levels; and, where possible, foreign currency asset/liability matching. Investments are primarily managed by the Investment function, which is overseen by the Investment Committee.

The 'Prudent Person Principle' is embedded in Solvency II and is used to guide the Company to invest in assets and instruments that can be properly identified, measured, monitored, managed, controlled and reported on. They are invested in a manner to ensure the security, quality, liquidity, and profitability of the portfolio, and such that they are available to the Company in the relevant currency as required. Assets held to cover technical provisions are also invested in a manner appropriate to the nature and duration of the Company's liabilities. They are invested in the best interest of all stakeholders, taking in particular into account the Company's customers. Assets are diversified in such a way that there is no over reliance on, or concentration of risk in, any particular asset, issuer, group of undertaking, geography, asset class or other risk attribute.

Risk treatment and mitigation strategies are driven by established risk appetite approved by the Board. Risk treatment/mitigation (e.g. establishing controls, procedures and the implementation of modified strategic activities designed to for example rebalance the portfolio into or away from specific asset classes given the underlying risk profile) or accepting risks to the extent at par with Board approved risk appetite is the responsibility of risk owners and oversight by senior management.

Appropriate controls and procedures are in place and monitored for on-going operational effectiveness to ensure that residual risk is maintained within approved risk appetite.

The Company did not invest in derivatives or other risk mitigation techniques during the financial year.

At year-end 2021, the Company assigned the entire investments portfolio (with exception of bank accounts allocated per region) from the Schaan head office to the SISE UK branch, as a form of capital contribution by the head office. This was to help the branch meet its branch SCR and reflect the economic position of the branch more accurately being the largest branch in the Company by reserves. The assignment of investments to the UK branch had no impact on other branches or the legal entity's reporting, nor on Market risk as investments assigned to the UK branch will be consolidated for SISE reporting at a legal entity level. Notional investment income remains allocated to the underlying branches and therefore creates no impact to the individual branch taxable income.

No material changes have been made to the investment risk management process during the financial year.

### C.2.3 Risk exposure

Investments presented in the financial statements are shown in the table below.

Financial Investments by Category - 2022 \$000	Amortised Cost	Fair Value
<b>Long Term</b>		
Corporate Securities	39,499	39,507
US Government Securities	29,466	29,470
Mortgage-Backed Securities	15,293	15,295
<b>Other</b>		
Collective Investment Scheme	3	3
<b>Total</b>	<b>84,261</b>	<b>84,275</b>

Financial Investments by Maturity - 2022 \$000	Amortised Cost	Fair Value
Due in one year or less	12,687	12,691
Due after one through five years	53,635	53,636
Due after five through ten years	3,065	3,073
Due after ten years	14,874	14,875
<b>Total</b>	<b>84,261</b>	<b>84,275</b>

Financial Investments by Category - 2021 \$000	Amortised Cost	Fair Value
<b>Long Term</b>		
Corporate Securities	61,837	62,589
US Government Securities	78,354	78,639
Non-U.S. Government	9,048	9,161
Mortgage-Backed Securities	18,515	18,811
<b>Other</b>		
Collective Investment Scheme	3,221	3,252
<b>Total</b>	<b>170,975</b>	<b>172,452</b>

Financial Investments by Maturity - 2021 \$000	Amortised Cost	Fair Value
Due in one year or less	58,770	59,039
Due after one through five years	87,605	88,475
Due after five through ten years	6,522	6,591
Due after ten years	18,078	18,347
<b>Total</b>	<b>170,975</b>	<b>172,452</b>

Investments in securities are stated at the lower of cost or market value in the LIE GAAP balance sheet and at market consistent value in the SII balance sheet.

Deposits with banks and cash at bank and on hand include assets of \$0.4m (2021: \$0.4m) that were pledged as collateral for letters of credit issued in relation to insurance business written and \$1.1m (2021: \$1.8m) are also used as collateral within individual trust funds or as deposits with regulatory authorities.

The Company has restricted investments of \$84.2m (2021: \$89.7m) which are used as collateral within trust funds. There were no material changes during the financial year in the Company's market risk exposures.

### Interest Rate Risk

Interest rate risk is the risk that movements in interest rates lead to lower-than-expected profitability due to declines in asset valuations and/ or projected cash flows. The Company is exposed to interest rate risk primarily from financial investments, cash, and deposits. The risk of changes in the fair value of these assets is managed by investing in a diversified portfolio of securities. The Company does not invest in derivative instruments. Interest rate risk applies to the whole fixed income portfolio.

### Currency Risk

The Company's foreign currency policy is to mainly manage foreign currency risk by matching liabilities under insurance and reinsurance policies that are payable in foreign currencies with assets that are denominated in such currencies. In addition, SISE may selectively utilise foreign currency forward contracts to mitigate foreign currency risk. To the extent the foreign currency exposure is not matched or hedged, the Company may experience foreign exchange losses or gains, which would be reflected in the overall entity results. The assets backing shareholders' funds are largely kept in US Dollars, the Enstar Group's main currency.

### Equity Risk

Equity risk is the sensitivity of the values of assets, liabilities, and financial instruments to changes in the level or in the volatility of market prices of equities. The capital requirement for equities is equal to the loss in the basic Own Funds that results from an instantaneous decrease in the market value of the equity. The Company does not hold any equities and is therefore not exposed to any equity risk.

### Spread Risk

Spread risk is the sensitivity of the values of assets, liabilities, and financial instruments to changes in the level or in the volatility of credit spreads over the risk-free interest rate term structure. The capital requirement for spread risk is equal to the sum of:

- The capital requirement for spread risk on bonds and loans;
- The capital requirement for spread risk on securitization positions; and
- The capital requirement for spread risk on credit derivatives

The capital requirement for spread risk on bonds and loans is equal to the loss in the basic own funds that results from an instantaneous relative decrease in the value of each bond or loan. This risk is mitigated by placing limits on exposure to a single counterparty and by reference to the credit rating of the counterparty. Financial assets are graded according to current credit ratings issued by prominent rating agencies.

### Concentration Risk

Additional risks to an insurance or reinsurance undertaking stemming either from lack of diversification in the asset portfolio or from large exposure to default risk by a single issuer of securities or a group of related issuers. The capital requirement for market risk concentration is calculated on the basis of single name exposures and equal to the loss in basic own funds that result from an instantaneous decrease in the market value of the assets. The concentration risk is managed by the Enstar Investment team by maintaining an appropriate mix of investment instruments.

## C.2.4 Stress and sensitivity analysis

For 2022, the Company observed the continued impact on the volatility within financial markets as a result of geopolitical tension, rising inflation, rising interest rate, withdrawal of stimulus and an economic downturn.

A description of the stress and scenario testing performed by the Company around key strategic and business plan assumptions is included in **Section B.3 and C.7.1**.

## C.3 Credit Risk

### C.3.1 Risk description

Reinsurance Credit & Counterparty Risk is defined as the risk relating to a reinsurance counterparty's ability to make timely payments in accordance with the contractual terms of the reinsurance contract.

Reinsurance Credit & Counterparty Risks can be broken down into the following sub risks:

- Dispute risk arising from claims or contractual disputes with reinsurers resulting in lower-than-expected reinsurance recoverables. This risk includes the untimely receipt of recoverables, which may result in balances being time-barred and existing bad debt provisions being increased.
- Default risk arising from default or changes to credit quality of the reinsurer.
- Counterparty Concentration risk arising from the risk of higher total losses from inadequate diversification across counterparties.

The key sources of Credit risk for the Company are:

- Risk of non-recoverable internal reinsurance from the significant internal quota share reinsurance with SIBL. This is the most significant credit risk to the Company;
- Risk of non-recoverable reinsurance assets currently held on balance sheet (outstanding and IBNR) due to Reinsurer failure;
- Risk of failure of external reinsurers on current reinsurance programme and any unexpired risks
- Risk of failure of coverholders, brokers or policyholders; and
- Risk of default or failure of investment counterparties such as banks, investment funds etc.

### C.3.2 Credit risk management / mitigation

The Company's objective in managing credit risk is to ensure the risk is managed in a sound and prudent manner in line with the Company's risk profile and risk appetite, and regulatory requirements. The assets are invested in high quality investment grade securities managed by Goldman Sachs Asset Management. The Company has established policies and procedures in order to manage exposure to credit risk and methods to quantify exposure.

The Company mitigates credit risk through the reinsurance purchasing process, where reinsurers are subject to financial security and rating requirements prior to approval and by limiting exposure to individual reinsurers. Thereafter, credit risk is managed by the regular monitoring of reinsurance recoveries and premium due directly or via brokers and other intermediaries. At management level, reinsurer credit risk is monitored and overseen by the Management Board which meets quarterly. The Management Board monitors risk tolerance levels which have been approved by the Board as part of the Risk Appetite Framework.

In fixed maturity and short-term investment portfolios, credit risk is mitigated through diversification and issuer exposure limitation.

The Company's credit risk in respect of debt securities is managed by placing limits on its exposure to a single counterparty, by reference to the credit rating of the counterparty. Financial assets are graded according to current credit ratings issued by rating agencies such as Standard and Poor's. The Company has a policy of investing in mainly investment grade assets (i.e., those rated BBB and above).

The Company limits the amount of cash that can be deposited with a single counterparty and maintains an authorised list of acceptable cash counterparties.



Credit Risk is calculated using the standard formula and using an internal approach and is monitored through the quarterly risk report.

Appropriate controls and procedures are in place and monitored for on-going operational effectiveness to ensure that residual risk is maintained within approved risk appetite.

No material changes have been made to the credit risk management / mitigation process during the financial year.

### C.3.3 Risk exposure / concentration

The Company has a material counterparty concentration with its SIBL which has arisen due to a number of reinsurance contracts (see **Section B.1.4** above).

The following table analyses the credit rating by investment grade of Solvency II balance sheet assets shown in **Section D**.

Financial Assets by Rating - 2022 \$000	AAA	AA	A	BBB	Not Rated	Total
Investments	44,592	4,374	32,405	3,317	-	84,688
Reinsurance recoverables	-	68,660	280,556	2,220	43,794	395,230
Insurance and intermediary receivables	-	-	-	-	8,398	8,398
Reinsurance receivables	-	12,365	107,437	400	7,886	128,088
Receivables (trade, not insurance)	-	-	-	-	5,912	5,912
Cash and cash equivalents	-	-	12,687	-	-	12,687
Any other assets	-	-	-	-	17,942	17,942
<b>Total</b>	<b>44,592</b>	<b>85,399</b>	<b>433,085</b>	<b>5,937</b>	<b>83,932</b>	<b>652,945</b>

Financial Assets by Rating - 2021 \$000	AAA	AA	A	BBB	Not Rated	Total
Investments	29,746	40,675	91,178	11,449	-	173,048
Reinsurance recoverables	-	143,800	357,510	2,774	51,205	555,290
Insurance and intermediary receivables	-	-	-	-	19,679	19,679
Reinsurance receivables	-	14,114	75,895	272	5,026	95,307
Receivables (trade, not insurance)	-	-	-	-	6,670	6,670
Cash and cash equivalents	-	-	4,371	-	-	4,371
Any other assets	-	-	-	-	1,310	1,310
<b>Total</b>	<b>29,746</b>	<b>198,590</b>	<b>528,954</b>	<b>14,495</b>	<b>83,889</b>	<b>855,674</b>

This analysis shows that on a Solvency II valuation basis 86% (2021: 89%) of the Company's assets have held with counterparties that are rated A or above.

The Company has debtors arising from direct insurance and reinsurance operations and may make a provision (where applicable) for non-recovery after undertaking an assessment of the counterparty's financial position and likelihood of recoverability.

There were no other material changes over the financial year in the Company's credit risk exposures during the reporting period.

### C.3.4 Stress and sensitivity analysis

A description of the stress and scenario testing performed by the Company around key strategic and business plan assumptions is included in **Section B.3 and C.7.1**.



## C.4 Liquidity Risk

### C.4.1 Risk description

Liquidity risk is the risk that the Company is unable to realise investments and other assets in order to settle financial obligations when they fall due or that we would have to incur excessive cost to do so. SISE follows an appropriately conservative investment strategy designed to emphasise the preservation of its invested assets and provide sufficient liquidity for the prompt payment of claims as they fall due and settlement of commutation and policy buyback payments. As the Company decided to discontinue underwriting as from June 2020, future premiums have a decreasing impact on the Company's liquidity position.

### C.4.2 Risk management / mitigation

Risk treatment and mitigation strategies are driven by the established risk appetite as approved by the Board. Risk treatment/mitigation (e.g. establishing controls, procedures and the implementation of modified strategic activities to either reduce cash demands and/or source additional liquidity capacity) or accepting risks to the extent at par with Board approved risk appetite is the responsibility of risk owners and oversight by senior management.

The Company mitigates this risk by following an investment strategy designed to emphasise the preservation of invested assets and provide sufficient liquidity for the prompt payment of claims and contract liabilities from both internal and external counterparties. The Company maintains banking facilities, continuously monitors forecast and actual cash flows and matches the maturity profiles of assets and liabilities such that it will always have sufficient liquidity to meet liabilities when they fall due.

At management level, Liquidity risk is monitored and overseen by the Management Board which meets at least quarterly. The Management Board monitors liquidity against key risk indicators defined in the risk appetite statement. A liquidity plan is being approved by the Management Board to determine the long-term payment schedule to provide a comfortable cash position to cover projected cash in-and-outflows.

Appropriate controls and procedures are monitored for on-going operational effectiveness to ensure that residual risk is maintained within approved risk appetite.

### C.4.3 Expected profit in future premiums

The Company has expected profit included in future premiums ("EPIFP") gross of reinsurance amounting to \$0.5m (2021: Nil).

This amount is calculated on a discounted basis as gross future premiums less the estimated claims, commissions and expenses in respect of these future premiums. The risk margin is excluded.

The estimate has been calculated using the internal class of business categories which are considered to be homogeneous risk groups. The future claims have been estimated separately for earned, unearned and committed-to premiums. For the earned element, the outstanding premium information is not available at a level that would allow identification of the actual claims associated with the premium. Given this it has been assumed the earned element will run to the same loss ratio as the unearned.

### C.4.4 Liquidity risk exposure / concentration

Throughout the year, SISE's Liquidity Risk has increased following a decrease in the operational and liquid cash level. This is a result of lower cash inflows from premiums and receivables collections compared to the cash outflows from claims and payables. Management has outlined a long-term liquidity plan projecting cash in and outflows for the coming year together with an increased

collection of receivables in order to put operational cash levels at a level sufficient to meet the projected future cash flows.

#### **C.4.5 Stress and Sensitivity Analysis**

A description of the stress and scenario testing performed by the Company around key strategic and business plan assumptions is included in **Section B.3 and C.7.1**.

## C.5 Operational Risk

### C.5.1 Risk description

Operational risk is the risk of a loss arising from inadequate or failed internal processes, or from external events (including cyber), personnel, systems or third parties. Due to our acquisitive strategy, operational risk also includes risks and challenges associated with integrating new exposures into the Company.

Operational risk includes outsourcing risk. Outsourcing risk is defined as an arrangement of any form between a firm and a service provider by which that service provider performs a process or activity or provides a service which would otherwise be undertaken by the firm itself.

### C.5.2 Operational risk management/ mitigation

All operational risks are assessed via the risk assessment process on a quarterly basis. Risk owners must provide an inherent and residual risk rating along with a supporting rationale. Key Risk Indicators are also assessed quarterly and all tolerances that have been exceeded or where the tolerance threshold is approaching, are reported to the Management Risk Committee and the Board.

Operational risk is mitigated through the application of policies and procedures, internal controls and compliance processes throughout the Company, including but not limited to business continuity planning, information security procedures, change management processes, financial reporting controls and a review process for material third-party vendor usage. Controls which are executed throughout the Company's operations, to mitigate against their associated risks crystallising, are assessed on a quarterly basis. Operational Risk is calculated using the standard formula and is monitored through the quarterly risk report. Operational stress tests are performed annually and reported through the ORSA process.

The business recognises the increased operational risk inherent in outsourcing and intragroup insourcing and seeks to mitigate this risk by implementing strong management oversight over each individual outsourced arrangement, and a greater concentration of oversight for those arrangements which are considered material because of their size, the risks associated with their failure or because of their nature (i.e., the outsourcer is performing a regulated activity).

The Risk Management Function assists the business with these responsibilities by providing the framework and tools, assisting with monitoring risk levels within the defined risk appetite and providing other support as needed.

The Company maintains a business continuity plan outlining the process to minimize the financial, legal, reputational, operational, and other material consequences arising from a natural or unscheduled disruption.

No material changes have been made to the measures for managing and mitigating operational risk during the financial year.

### C.5.3 Operational risk exposure / concentration

The key operational risk factors facing our business are as follows:

- The Company is dependent on executive officers, directors and other key personnel and the loss of any of these individuals could adversely affect our business. Retaining sufficiently skilled resource to manage the business is a significant risk. Specific retention approaches and plans have been applied to retain key underwriting, non-underwriting staff, and KFH's. In addition, the Company benefits from being majority owned by Enstar Group who have greater scale and may support functions in case of staff losses where a retention is not in place.

- The Company has a number of internal systems and processes that rely on people and technology. These are not immune from potential failure. The Company monitors operational risk through its risk management and internal control system.
- If outsourced providers such as third-party administrators, investment managers or other service providers were to breach obligations owed to the Company, the business and results of operations could be adversely affected. All outsourcing and material supplier contracts have been subject to enhanced monitoring in light of the global COVID-19 pandemic, focusing specifically on the providers business continuity plans and readiness.
- If the Company experiences difficulties with information technology assets or cyber security, its business could be adversely affected.

#### **C.5.4 Stress and sensitivity Analysis**

A description of the stress and scenario testing performed by the Company around key strategic and business plan assumptions is included in **Section B.3 and C.7.1**.

## C.6 Other Material Risks

### C.6.1 Strategic Risk

Strategic risk is the risk of unintended adverse impact on the business plan objectives arising from business decisions, improper implementation of those decisions, inability to adapt to changes in the external environment, or circumstances that are beyond the Company's control.

All Strategic and Group risks are assessed via the Risk Management system on a quarterly basis. Risk owners must provide an inherent and residual risk rating along with a supporting rationale. Key Risk Indicators are also assessed quarterly and all tolerances that have been exceeded or where the tolerance threshold is approaching, are reported to the Board.

No changes have been made to the measures for assessing Strategic and Group risk in the reporting period.

The Company monitors the capital position relative to regulatory, rating agency and internal capital requirements and anticipated liquidity needs. This analysis is periodically subjected to stress testing to determine, amongst other things, what the impact of a significant financial losses within one subsidiary would be on the capital position of the group.

The Company has historically depended on the Group's AM Best A- rating to support underwriting activity and to support the level of capital held for Credit Risk. In the event of a downgrade this would reduce the Company's capital surplus. The rating was re-affirmed in 2022 with a stable outlook.

At management level, Strategic and Group Risk is monitored and overseen by the Risk Management function and the Board which meets at least quarterly.

### C.6.2 Group Risk

Group risk arises from the Company being majority owned by Enstar Group. Enstar is a Bermuda-based holding Company, formed in 2001, that offers innovative capital release solutions and specialty underwriting capabilities through its network of Group companies in Bermuda, the United States, the United Kingdom, Continental Europe, Australia, and other international locations. Enstar is listed on the NASDAQ Global Select Market under the ticker symbol "ESGR".

Enstar focuses on the acquisition and management of insurance and reinsurance companies in run-off and the acquisition and management of portfolios of insurance and reinsurance business in run-off.

### C.6.3 Regulatory and Reputational Risk

Regulatory risk is the risk of legal or regulatory sanctions resulting in a financial loss, or loss of reputation as a result of an insurer's failure to comply with laws, regulations, rules, related self-regulatory organization standards, and codes of conduct. We manage reputational risk through a focus on compliance with laws and regulations, adherence to our policies and procedures (including our Code of Conduct) and our internal controls, an established corporate governance framework and practices, and communication and engagement with external stakeholders.

SISE's UK Branch was operating within the UK TPR following the end of post-Brexit transition period. The TPR allows EEA-based firms to operate in the UK for a limited period while seeking full authorisation. As SISE UK branch is not seeking to write business, no application for full authorisation from the PRA was required. The branch continued to operate under the TPR during 2022 and filled an application to transition to the SROR with the PRA and the FCA in the second half of 2022. The application to transition to the SROR was approved with effective date 1 January 2023.

Branches operating within the TPR and SROR are required to comply with the same regulatory requirements that apply to UK third country branches, with both quantitative and qualitative reporting requirements applying for the year ended 31 December 2022.

As SISE is currently compliant with Solvency II regulatory reporting requirements, the financial reporting methodologies, and processes currently in place can be leveraged to meet the SISE UK branch specific reports.

#### **C.6.4 Tax Risk**

Tax risk is the risk requirements are not adhered to accurately or in a timely manner resulting in a financial loss. The Company proactively seeks to identify, evaluate, manage, monitor and mitigate tax risks. SISE is committed to complying with all tax laws, rules and regulations applicable. In evaluating potential transactions, the Company considers the overall commercial, financial and tax aspects. Where there is uncertainty or complexity in relation to a tax risk, the Company may seek external advice and, where appropriate, we may obtain tax clearances from relevant tax authorities.

#### **C.6.5 Climate Change**

The Company has ceased writing new and renewal business and hence, exposure to climate-related risks emanates from existing insurance liabilities and the assets that back those liabilities.

The ERM Framework defines the roles and responsibilities for effective oversight and management of ESG and climate-related risks and opportunities at the Board and senior management levels.

The Company could be exposed to the following risks:

- **Physical risks (Short to Longer term):** These are the first order risks arising from weather-related events, such as floods and storms. Their impact may be felt directly through property damage, or indirectly through subsequent events such as disruption of global supply chains or resource scarcity.

The Company's exposure to physical risks stem from our operations and investments portfolios (i.e., physical risks of the underlying companies we are invested in). Other physical risk exposures can stem from either the administration of very limited in-force catastrophe exposures through the running off of the multi-year construction policies previously written by SISE and placed into run-off in 2020. Since the Company no longer underwrites live insurance contracts, this risk is of low consequence.

The Company's operations may be impacted by physical risks affecting key supporting infrastructure and/or our outsourced service providers. The impact and likelihood of this risk is considered low, given our global presence and the Business Continuity Framework and procedures we have in place.

- **Transition risks (Short to Medium Term):** These include financial risks deriving from the transition to a carbon net zero economy, and for the Company include potential swift, adverse repricing of carbon-intensive financial assets.

In the near term, the investment portfolio could be exposed to the loss of value in specific investments due to disruption caused by transitioning to a lower carbon emitting economy to the underlying assets. The impact could increase over time if part of the transition to a greener economy is associated with increased production costs. Certain sectors could be subject to significant impairments due to changing consumer demand, the repricing of assets or changing regulatory requirements.

The recent geo-political tensions resulting from the Russia-Ukraine conflict has the potential to accelerate these traditional risks through the need to diversify existing energy sources, including increased investment in energy derived from more sustainable sources.

- Liability risks (Short to Medium Term) include third-party exposures such as claimants who have suffered climate-change related losses and damage and seek compensation. Liability risks also include the unknown and potentially high costs of dealing with losses or damage from physical or transition risk factors. Liability risks are particularly high for those directors and officers who do not properly manage and report climate-related risks and commit errors and omissions.

In order to quantify the financial impact of risks/opportunities brought about by the climate-related risks set out above, the Company undertakes a periodic analysis to quantify the potential impact on both our assets and liabilities. Stress and scenario testing conducted in 2022 indicates that the impact of physical, transition and liability risks on SISE's portfolios is low.

## C.7 Any Other Information

### C.7.1 Stress and Scenario Analysis

Integral to the business planning process is the performance of stress and scenario testing around key strategic and business plan assumptions. A description of Stress and Scenario Analysis performed by the Company is included in **Section B.3**.

Based on projections for the next 3 years (2023-2025), the Company's Own Funds are expected to exceed its SCR and target level of capital over the three-year projection period. SISE's solvency position is sensitive to the credit rating of SIBL due to internal reinsurance arrangements with SIBL and mitigating actions may be required if SIBL were to be downgraded to below BBB.



## Section D Valuation for Solvency Purposes

Solvency II requires a market consistent approach to the valuation of assets and liabilities. A number of assets and liabilities require different valuation methods to those used in the financial statements. The financial statements are prepared under LIE GAAP. The table below summarises the Solvency II and the LIE GAAP valuation of assets, based on the Solvency II balance sheet headings and the Solvency II approach to classifying assets and liabilities. An explanation of the Solvency II valuation methods and assumptions, including key differences to those used under LIE GAAP, is provided in the subsequent sections. A more detailed Solvency II balance sheet is included in Appendix 1 (QRT S.02.01).

Balance Sheet - 2022	Statutory Value (LIE GAAP)	Reclassification Differences	Valuation Differences	Solvency II Value	Notes
<b>\$000</b>					
Investments	84,262	419	7	84,688	D1.1
Reinsurance recoverables	460,348	(43,218)	(21,900)	395,230	D1.2
Insurance and intermediary receivables	12,704	(4,305)	-	8,399	D1.3
Reinsurance receivables	128,088	-	-	128,088	D1.4
Receivables (trade, not insurance)	5,912	-	-	5,912	D1.5
Cash and cash equivalents	12,687	-	-	12,687	D1.6
Any other assets	18,361	(419)	-	17,942	D1.7
<b>Total Assets</b>	<b>722,362</b>	<b>(47,523)</b>	<b>(21,893)</b>	<b>652,945</b>	
Technical provisions	478,801	(4,305)	4,689	479,184	D2
Reinsurance payables	48,303	(43,218)	-	5,085	D3.1
Payables (trade, not insurance)	8,495	-	-	8,495	D3.2
Any other liabilities	630	-	-	629	D3.3
<b>Total Liabilities</b>	<b>536,229</b>	<b>(47,523)</b>	<b>4,689</b>	<b>493,394</b>	
<b>Excess of Assets over Liabilities</b>	<b>186,133</b>	<b>-</b>	<b>(26,582)</b>	<b>159,552</b>	

Balance Sheet - 2021	Statutory Value (LIE GAAP)	Reclassification Differences	Valuation Differences	Solvency II Value	Notes
<b>\$000</b>					
Investments	170,975	577	1,494	173,048	D1.1
Reinsurance recoverables	604,292	(44,049)	(4,954)	555,290	D1.2
Insurance and intermediary receivables	19,679	-	-	19,679	D1.3
Reinsurance receivables	95,307	-	-	95,307	D1.4
Receivables (trade, not insurance)	6,670	-	-	6,670	D1.5
Cash and cash equivalents	4,371	-	-	4,371	D1.6
Any other assets	1,887	(577)	-	1,310	D1.7
<b>Total Assets</b>	<b>903,182</b>	<b>(44,049)</b>	<b>(3,460)</b>	<b>855,675</b>	
Technical provisions	629,081	-	46,160	675,242	D2
Reinsurance payables	54,030	(44,049)	-	9,981	D3.1
Payables (trade, not insurance)	4,097	-	-	4,097	D3.2
Any other liabilities	1,505	-	-	1,505	D3.3
<b>Total Liabilities</b>	<b>688,713</b>	<b>(44,049)</b>	<b>46,160</b>	<b>690,825</b>	
<b>Excess of Assets over Liabilities</b>	<b>214,469</b>	<b>-</b>	<b>(49,620)</b>	<b>164,850</b>	

The following table provides a reconciliation of the excess of assets over liabilities reported in the Solvency II balance sheet to equity shareholders' funds reported in the GAAP balance sheet.

<b>Excess Assets over Liabilities \$000</b>	<b>2022</b>	<b>2021</b>
<b>Excess of assets over liabilities - GAAP</b>	<b>186,133</b>	<b>214,469</b>
Profit in Unearned Premium Provision ("UPR")	3,073	510
Future cost of reinsurance	-	(8,973)
Events not in Data ("ENIDS")	(523)	(450)
SII Expense provision	(27,816)	(29,813)
Risk Margin	(10,225)	(14,276)
Discounting	8,701	1,760
Other	202	129
<b>Technical provision adjustments</b>	<b>(26,589)</b>	<b>(51,114)</b>
Other Solvency II adjustments	7	1,496
<b>Excess of assets over liabilities - Solvency II</b>	<b>159,552</b>	<b>164,850</b>

## D.1 Assets

### D.1.1 Investments

Investments consist primarily of investment grade, liquid, fixed maturity securities of short-to-medium duration.

Investments are recognised under Solvency II when the Company becomes a party to the contractual provisions of the instrument. Investments are de-recognised if the Company's contractual rights to the cash flows from investments expire or if the Company transfers the investments to another party without retaining control of substantially all risks and rewards of the assets. This is the same recognition basis under LIE GAAP reporting and there has been no change in the recognition criteria during the year.

#### Valuation differences

Solvency II requires investments to be recognised at fair value which is the amount an asset or liability could be exchanged between willing parties in an arm's length transaction. Under LIE GAAP, investments in securities are stated at the lower of cost or market value. In the Solvency II balance sheet, the carrying value of the assets held at cost is adjusted to fair value. Fair values are determined at prices quoted in active markets. The fair values for all securities in the fixed maturity investments portfolio are independently provided by the investment accounting service providers, investment managers and investment custodians, each of which utilise internationally recognised independent pricing services. We record the unadjusted price provided by the investment accounting service providers, investment managers or investment custodians.

The independent pricing services used by the investment accounting service providers, investment managers and investment custodians obtain actual transaction prices for securities that have quoted prices in active markets. Our internal price validation procedures and review of fair value methodology documentation provided by independent pricing services have not historically resulted in adjustment in the prices obtained from the pricing service.

#### Investment classification

Classification differences exist between LIE GAAP and Solvency II for certain investment balances.

Cash and cash equivalents are classified differently between LIE GAAP and Solvency II. Under LIE GAAP, an investment qualifies as a cash and cash equivalent only when it has a short maturity of, three months or less from the date of acquisition. Money market funds and deposits less than 90 days are classified as cash and cash equivalents under LIE GAAP, however, they are classified as collective investments undertakings and deposits other than cash equivalents for Solvency II reporting, respectively.

Accrued interest is classified separately as 'Accrued interest and rest' on the balance sheet of the Company's financial statements but for Solvency II, accrued interest is included as part of investment valuation (Solvency II amount).

### D.1.2 Reinsurance recoverables

The company uses reinsurance and retrocessional agreements to reduce its exposure to insurance and reinsurance risks assumed. The Company remains liable to the extent that certain reinsurance is finite or that the reinsurers do not meet their obligation under these agreements.

Reinsurance recoverable balances relate to the reinsurance of gross technical provisions which will fall due under the terms of the reinsurance and retrocessional agreements. These amounts have been valued based on amounts that will be contractually due to the Company from cedants and reinsurers if and when claims are settled. They are adjusted for:

- i) potentially non-recoverable balances that are disputed or due from reinsurers with a poor credit rating and

- ii) the probability weighted average of future cash flows taking into account the time value of money using the latest risk-free discount rates promulgated by EIOPA.

Future cash inflows are determined by calculating reinsurance recoveries on estimated cash outflows of gross technical provisions which are based on an annual actuarial study using appropriate actuarial techniques (see technical provisions below). Reinsurance recoverables reported in the Solvency II balance sheet have also been uplifted for the reinsurance impact of the possibility of extreme events.

There has been no change in the recognition and valuation of this balance during the year. The balances reported in the Solvency II balance sheet differ from amounts reported in statutory financial statements due difference in the valuation methodology between LIE GAAP and Solvency II (see technical provisions below). The valuation adjustment relates to Solvency II adjustments in respect of premium provisions claims, ENIDs, future cost of reinsurance and discounting.

### **D.1.3 Insurance and intermediaries' receivables**

This balance mainly relates to premiums due from intermediaries and the amounts are recognised in the GAAP balance sheet when the Company becomes a party to the contractual provisions of the asset.

Under LIE GAAP, receivables are valued at undiscounted amortised cost less any adjustment for impairment losses. The LIE GAAP valuation policy is considered to be a close approximation to fair value, and therefore no valuation adjustments are made for Solvency II reporting purposes.

As required in the Solvency II guidance, the portion of insurance and intermediary receivables recognised as an asset on the LIE GAAP balance sheet, that are not-yet-due at the reporting date, are transferred to technical provisions in the Solvency II balance sheet whilst the amount over-due (i.e. when they remain unpaid in the first business day after the payment deadline) within 'insurance and intermediaries receivables' in the Solvency II balance sheet.

There has been no change in recognition basis during the year.

### **D.1.4 Reinsurance receivables**

Reinsurance receivables relate to paid claims recoverable, premium refunds and other amounts due to the Company from reinsurers under the terms of the reinsurance and retrocessional agreements in place with those reinsurers. These balances have been valued based on amounts that are contractually due to the Company by reinsurers adjusted for potentially non-recoverable balances that are disputed or due from reinsurers with a poor credit rating. This is deemed to be a close approximation to fair value, and therefore no valuation adjustments are made for Solvency II reporting purposes.

There has been no change in recognition or valuation basis during the year.

### **D.1.5 Receivables (trade, not insurance)**

Under LIE GAAP, receivables are valued at undiscounted amortised cost net of provisions for expected credit losses. Given the short-term maturity of these assets, the LIE GAAP valuation policy is considered to be a close approximation to fair value, and therefore no adjustments are made for Solvency II valuation purposes. All material receivables are due within 12 months.

There has been no change in recognition or valuation basis during the year.

### **D.1.6 Cash and cash equivalents**

No valuation differences exist between LIE GAAP and Solvency II. Cash and cash equivalents in the Solvency II balance sheet consist of deposits that can be exchanged for currency on demand at par

value and are valued at their par value. Cash and cash equivalents are classified differently between LIE GAAP and Solvency II. Refer to **Section D.1.1** for additional information.

There has been no change in recognition or valuation basis during the year.

#### **D.1.7 Any other assets**

These balances include other assets and prepayments. Under LIE GAAP these assets are carried at cost less any adjustment for impairment losses. Given the short-term nature of these assets, this is considered to be a close approximation to the Solvency II fair value. All material other receivables are due within 12 months.

The reclassification adjustment of \$0.4m (2021: \$0.6m) relates to accrued interest which under SII is reported as part of the financial investments.

Under LIE GAAP, commissions and other direct and indirect costs that are related to, securing new contracts and renewing existing contracts are not capitalised as Deferred Acquisition Costs ("DAC"). DAC is also not recognised as an asset in the Solvency II balance sheet as they are not a separable and saleable asset. Cash flows relating to acquisition costs, attached to future premiums, are included in the Solvency II technical provisions (further details provided in **Section D.2**).

At 31 December 2022, no deferred tax assets have been recognised in the SII balance sheet.

## D.2 Technical Provisions

In accordance with Article 77 of the Solvency II Directive the value of the technical provisions consists of the best estimate of all future cash flows required to settle its insurance and reinsurance obligations, discounted at the risk-free rate of interest using the yield curves published by EIOPA for the reporting date, with the addition of a risk margin.

- The best estimate liabilities are calculated as:
  - i. the discounted best estimate of all future cash flows relating to claim events prior to the valuation date ('claims provisions'); and
  - ii. the discounted best estimate of all future cash flows relating to future exposure arising from policies that the insurer is obligated to at the valuation date ('premium provisions').
  
- The Risk Margin is the amount that insurers would require over and above the best estimate liabilities in order to take over and meet the insurance and reinsurance obligations over the lifetime of the policies.

In addition, in determining the cash flows, the following estimations are made:

- Calculation of obligations arising from ENIDs
- Calculation of run-off expenses
- Determination of payment patterns
- Determination of future cost of reinsurance
- Calculation of the counterparty default

An analysis of gross and ceded technical provisions by Solvency lines of business including risk margin is shown below. Further detail is provided in Appendix 1 (QRT S.17.01).

Technical provisions - 2022 \$'000	Medical expense	Other motor	Marine, aviation and transport	Fire and other damage to property	General liability	Credit and suretyship insurance	Non-Prop. Property	Total
Premium provisions	-	-	38	20,698	1,159	1,084	-	<b>22,979</b>
Claims provisions	4,616	3,221	96,679	194,768	135,186	7,082	4,428	<b>445,980</b>
<b>Gross Best estimate</b>	<b>4,616</b>	<b>3,221</b>	<b>96,717</b>	<b>215,466</b>	<b>136,345</b>	<b>8,166</b>	<b>4,428</b>	<b>468,959</b>
Reinsurance	2,829	2,234	81,897	185,105	113,484	6,931	2,750	<b>395,229</b>
<b>Net technical provisions before risk margin</b>	<b>1,787</b>	<b>987</b>	<b>14,820</b>	<b>30,361</b>	<b>22,861</b>	<b>1,235</b>	<b>1,678</b>	<b>73,729</b>
Risk margin	256	49	1,526	2,119	5,780	496	-	<b>10,226</b>
<b>Net technical provisions</b>	<b>2,043</b>	<b>1,036</b>	<b>16,346</b>	<b>32,480</b>	<b>28,641</b>	<b>1,731</b>	<b>1,678</b>	<b>83,955</b>

Technical provisions - 2021 \$'000	Medical expense	Other motor	Marine, aviation and transport	Fire and other damage to property	General liability	Credit and suretyship insurance	Non-Prop. Property	Total
Premium provisions	-	-	209	40,876	1,431	3,405	-	<b>45,921</b>
Claims provisions	6,379	5,995	115,671	292,165	183,251	6,475	5,109	<b>615,044</b>
<b>Gross Best estimate</b>	<b>6,379</b>	<b>5,995</b>	<b>115,880</b>	<b>333,041</b>	<b>184,682</b>	<b>9,880</b>	<b>5,109</b>	<b>660,965</b>
Reinsurance	4,264	4,669	97,250	281,145	156,537	8,040	3,384	<b>555,289</b>
<b>Net technical provisions before risk margin</b>	<b>2,115</b>	<b>1,326</b>	<b>18,630</b>	<b>51,896</b>	<b>28,145</b>	<b>1,839</b>	<b>1,724</b>	<b>105,675</b>
Risk margin	453	135	3,175	4,180	5,752	580	-	<b>14,276</b>
<b>Net technical provisions</b>	<b>2,260</b>	<b>1,462</b>	<b>21,224</b>	<b>58,903</b>	<b>32,240</b>	<b>2,023</b>	<b>1,841</b>	<b>119,951</b>

## D.2.1 Claims provision

The claims provision is the discounted best estimate of all future cash flows (claim payments, expenses and future premiums) relating to claim events prior to the valuation date.

Past exposure	Claims Provision					
	Expected present value of:					
	Claims (incurred)	+	Allocated and unallocated claims management expenses	+	Other Expenses (earned element)	- Future premiums receivable (earned element)

Claims incurred mainly comprises case reserves and IBNR claims.

### D.2.1.1 Case reserves and IBNR

#### Case reserves

Case reserves are made on an individual case basis and are based on the estimated cost of all claims reported but not settled by the balance sheet date.

#### IBNR

IBNR is generally subject to a greater degree of uncertainty than reported claims. Classes of business where the IBNR proportion of the total reserve is high will typically display greater variations between initial estimates and final outcomes because of the greater degree of difficulty of estimating these reserves.

Classes of business where claims are typically reported relatively quickly after the claim event tend to display lower levels of volatility. In calculating the estimated cost of unpaid claims, the Company uses a variety of estimation techniques. In the initial years, the estimation of the claims will be based on pricing assumptions and comparison to industry benchmarks. Once adequate data is available, the estimation is generally based upon statistical analyses of historical experience, which assumes that the development pattern of the current claims will be consistent with experience. Allowance is made, however, for changes or uncertainties which may create distortions in the underlying statistics, or which might cause the cost of unsettled claims to increase or reduce when compared with the cost of previously settled claims including:

- changes in Company processes which might accelerate or slow down the development and/or recording of paid or incurred claims compared with statistics from previous periods;
- changes in the legal environment;
- the effects of inflation;
- changes in the mix of business;
- the impact of large losses; and
- any movements in industry benchmarks.

A component of these estimation techniques is usually the estimation of the cost of notified but not paid claims. In estimating the cost of these the Company has regard to the claim circumstance as reported, any information available from loss adjusters and any available information on the cost of settling claims with similar characteristics.

Large claims impacting each relevant business class are generally assessed separately, being measured on a case-by-case basis or projected separately in order to allow for the possible distorting effect of the development and incidence of these large claims.

Provisions are calculated net of any estimated amounts of salvage and subrogation recoveries, but gross of any reinsurance recoveries.

The technical provisions are not discounted under LIE GAAP. Under Solvency II the technical provisions are adjusted for the probability weighted average of future cash flows taking into account the time value of money based on the currency of the reserves and the prescribed EIOPA risk-free yield curve.

#### **D.2.1.2 Provision for unearned premium**

Unearned premiums are those proportions of premiums written in a year that relate to periods of risk after the reporting date computed separately for each insurance contract. Written premiums are recognised as earned over the period of the policy on a time apportionment basis having regard, where appropriate, to the incidence of risk. The proportion attributable to subsequent periods is deferred as a provision for unearned premiums. Unearned outwards reinsurance premiums are those proportions of premiums written in a year that relate to periods of risk after the reporting date. Unearned reinsurance premiums are deferred over the term of the underlying direct insurance policies for risks-attaching contracts and over the term of the reinsurance contract for losses-occurring contracts.

UPR is eliminated from the balance sheet and replaced with a provision accounted for on a best estimate basis taking account of all the cash flows (i.e. losses and premium debtors) relating to unearned business. When considering which cashflows to include in the calculation of outwards reinsurance premium and recoveries in the best estimate underlying technical provisions, the Company's key principle is to ensure these are consistent with the inwards policies included in the same valuation subject to certain specific rules on recognising legally obliged reinsurance contracts.

#### **D.2.1.3 Future Premium Cashflow**

The Solvency II guidance requires that the best estimate calculation should take account of projections for all potential cash inflows and outflows required to settle insurance / reinsurance obligations. This includes premiums paid in instalments and due in the future (not-yet-due premiums).

The same principle is applied for outwards reinsurance – with reinsurance creditors payable with a due date post the balance sheet date recognised in the reinsurance claims provision to the extent they relate to an earned exposure and the premium provision where they relate to unearned exposure.

#### **D.2.1.4 Events Not in Data**

Solvency II best estimates should make an allowance for "all possible events" – this should include high severity, low probability claims. ENIDs are not explicitly modelled as part of the reserving process. The Company performs a separate analysis once a year to derive an ENID event load which is applied to the best estimate reserves and is dependent on the perceived risk within lines of business.

#### **D.2.1.5 Loss adjustment expenses**

The Solvency II expense provision includes more costs than the LIE GAAP current unallocated loss adjustment expenses provision as it specifically includes overheads/ admin/ investment management expenses.

The Solvency II guidance requires that the best estimate includes all cash flows arising from expenses that will be incurred servicing existing policies during their lifetime. Allocated loss adjustment expenses directly assignable to individual claims are included in the claims and premium provision. Solvency II guidance details the following examples of expenses that will be incurred servicing all obligations from existing insurance and reinsurance contracts:

- administrative expenses;
- investment management expenses;
- claims management expenses / handling expenses; and
- acquisition expenses including commissions.

Expenses include both overhead expenses and expenses which are directly assignable to individual claims, policies or transactions.

#### **D.2.1.6 Counterparty default**

Solvency II requires inclusion of a provision for non-receipt of reinsurance recoveries whether caused by default or dispute. The probability of counterparty default is set based on S&P credit ratings.



### D.2.2 Premium provision

The premium provision is the discounted best estimate of all future cash flows (claim payments, expenses and future premiums) relating to future exposure arising out of policies that are legally obliged at the valuation date. The premium provisions amount is derived from unearned incepted business and unearned business.

Future exposure	Premium Provision					
	Expected present value of:					
	Claims (unexpired)	+	Allocated and unallocated claims management expenses	+	Other Expenses (unearned element)	- Future premiums receivable (unearned element)

### D.2.3 Risk margin

The SII Directive requires that the risk margin should be calculated at a level such that the value of technical provisions is equivalent to the amount insurance and reinsurance undertakings would expect to require in order to take over and meet the insurance and reinsurance obligations. This is calculated using a "cost of capital" approach using a cost of capital rate as determined by EIOPA (currently prescribed at 6%). The following steps are followed in calculating the risk margin:

- i. First, a proxy SCR is calculated in respect of the opening balance sheet, with the proxy SCR incorporating SCRs for reserve risk, counterparty default risk and operational risk, all calculated in accordance with EIOPA's guidelines. Market risk is not considered in the risk margin as the calculation assumes (based on EIOPA guidance) that a potential acquirer would structure its assets in such a way to minimise market risk.
- ii. Proxy SCRs are derived for future balance sheets by assuming that the SCR runs off in line with the square root of reserves. The reserves in each future period are estimated by applying the relevant payment patterns to the opening balance sheet.
- iii. EIOPA prescribed cost of capital of 6% is applied to the resulting stream of SCRs.
- iv. The resulting stream is then discounted using the EIOPA prescribed spot-rate risk-free yield curve for USD and assumed to derive the opening balance sheet risk margin. The USD curve is used because this is the Company's reporting currency and majority of the business is USD denominated.

#### D.2.4 Other technical provision information

The table below shows the adjustments made to the LIE GAAP technical provisions to estimate the Solvency II technical provisions and the movement in technical provisions year on year.

Reconciliation (LIE GAAP to SII) \$000	2022	2021	Movement in TPs
<b>LIE GAAP Net Reserves</b>	<b>18,453</b>	<b>24,789</b>	<b>(6,336)</b>
Removal of UPR	(3,570)	(1,359)	(2,211)
UPR losses	496	850	(354)
Inclusion of FCRI costs	-	8,973	(8,973)
Provision for ENIDs	523	450	73
Debtor and Creditor not yet due reclassification	38,913	44,049	(5,136)
Provision for additional expenses	27,817	29,813	(1,996)
Discounting	(8,701)	(1,760)	(6,941)
Provision for risk margin	10,225	14,276	(4,050)
Other adjustments	(201)	(129)	(72)
<b>SII Net Technical Provisions</b>	<b>83,955</b>	<b>119,952</b>	<b>(35,997)</b>

The Company does not use any of the following methodologies outlined in Directive 2009/13/EC in determining its technical provisions:

- a) Matching adjustment referred to in Article 77b of the Directive;
- b) Volatility adjustment referred to in Article 77d of the Directive;
- c) Transitional risk-free interest rate-term structure referred to in Article 308c; and
- d) Transitional deduction referred to in Article 308d.

A review of ENID Loads by was conducted at Q4 2022, leading to changes to the ENID Loads by Reserving Class.

The methodology for estimating the unallocated claims handling provision and expense provision were updated following the decision to cease underwriting new and renewal business.

The treatment of reinsurance recoveries was updated to remove the lag between the gross paid claims and reinsurance recoveries.

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

## **D.3 Other Liabilities**

### **D.3.1 Insurance and intermediaries payables**

Insurance and intermediaries payables relate to creditors arising out of direct insurance operations. Under LIE GAAP insurance and intermediary payables are held at amortised cost. Given the short-term maturity of these liabilities, this is considered to be a close approximation to fair value.

There has been no change in recognition or valuation basis during the year.

### **D.3.2 Reinsurance payables**

Reinsurance payables relates to amounts due to reinsurers for reinsurance arrangements purchased by the Company.

Under LIE GAAP, receivables are valued at undiscounted amortised cost.

As required in the Solvency II guidance, the portion of reinsurance payable that are not yet due at the reporting date, are transferred to technical provisions in the Solvency II balance sheet whilst the amount over-due within 'reinsurance payables' in the Solvency II balance sheet.

The overdue reinsurance payables are materially due within 12 months, the LIE GAAP valuation policy is considered to be a close approximation to fair value, and therefore no valuation adjustments are made for Solvency II reporting purposes.

There has been no change in recognition or valuation basis during the year.

### **D.3.3 Payables (trade, not insurance)**

The Company values payables at undiscounted amortized cost. Given the short-term maturity of these liabilities, the LIE GAAP valuation policy is considered to be a close approximation to fair value, and therefore no adjustments are made for Solvency II valuation purposes.

There has been no change in recognition or valuation basis during the year.

### **D.3.4 Any other liabilities**

Other liabilities mainly relate to accruals and balances due to other related companies. Other liabilities are held at amortised costs under LIE GAAP. Given the short-term maturity of these liabilities, the LIE GAAP valuation policy is considered to be a close approximation to fair value, and therefore no adjustments are made for Solvency II valuation purposes.

There has been no change in recognition or valuation basis during the year.

## D.4 Alternative methods of valuation

All methods of valuation have been outlined in the preceding sections and no other valuation methods of valuation have been adopted.

Below is a summary of assets and liabilities that have been valued using an alternative method of valuation.

All the assets and liabilities below have been valued at their carrying value as they are expected to be received or paid within 1 year, hence any discounting would be immaterial.

Account Name \$000	Amount	Section covered
Insurance and intermediary receivables	8,398	D1.3
Reinsurance receivables	128,088	D1.4
Receivables (trade, not insurance)	5,912	D1.5
Any other assets	17,942	D1.7
Reinsurance payables	5,085	D3.1
Payables (trade, not insurance)	8,495	D3.2
Any other liabilities	629	D3.3

## D.5 Any other information

All material information has been disclosed in the preceding sections.

## Section E Capital Management

### E.1 Own Funds

#### E.1.1 Objectives, policies and processes employed by SISE for managing its own funds

The Company's capital management framework and associated policies and processes are designed to meet the following objectives:

- to maintain financial strength in adverse conditions;
- to give customers long-term confidence in the Company;
- to satisfy our regulatory obligations;
- to match the profile of our assets and liabilities, taking account of the risk inherent in the business;
- and to allocate capital efficiently to support new business growth.

The Company complies with the regulatory solvency requirements and, where necessary, reviews its solvency needs in accordance with regulatory requirements. The Company adopts conventional actuarial and other methods to assess the risks to its solvency on a forward-looking basis. The Company's capital management strategy is to deploy capital efficiently and to maintain adequate loss reserves to protect against future adverse developments and other risks. Reinsurance is also used as part of risk mitigation and capital management.

The Company monitors projected own funds against SCR requirement over a three-year time horizon using conservative performance assumptions.

Based on projections for the next 3 years the company's own funds are expected to exceed its SCR and SISE's higher target level of capital over the three-year projection period.

The Company's solvency position is set out in the table below:

SISE Solvency Position \$000	2022	2021
Eligible Own Funds to meet the SCR	158,576	164,850
SCR	43,273	64,984
Eligible Own Funds to meet the MCR	139,103	146,812
MCR	10,818	16,246
<b>Ratio of Own funds to SCR</b>	<b>366%</b>	<b>254%</b>
<b>Ratio of Own funds to MCR</b>	<b>1286%</b>	<b>904%</b>

#### E.1.2 Structure, amount and quality of own funds at the end of the reporting period and analysis of changes over the reporting period

The Company's own funds is analysed in the following extract from the own funds QRT as at 31 December 2022 (\$23.01).

<b>Total Basic Own Funds - 2022</b> <b>\$000</b>	<b>Total</b>	<b>Tier 1</b> <b>Unrestricted</b>	<b>Tier 1</b> <b>Restricted</b>	<b>Tier 2</b>
Ordinary Share Capital	140,393	140,393	-	-
Preference Shares	50,000	-	50,000	-
Reconciliation Reserve	(30,841)	(30,841)	-	-
<b>Total basic own funds after deductions</b>	<b>159,552</b>	<b>109,552</b>	<b>50,000</b>	<b>-</b>
Total eligible own funds to meet the SCR	158,576	109,552	27,388	21,637
Total eligible own funds to meet the MCR	139,103	109,552	27,388	2,164
<b>Total Basic Own Funds - 2021</b> <b>\$000</b>	<b>Total</b>	<b>Tier 1</b> <b>Unrestricted</b>	<b>Tier 1</b> <b>Restricted</b>	<b>Tier 2</b>
Ordinary Share Capital	140,393	140,393	-	-
Preference Shares	50,000	-	50,000	-
Reconciliation Reserve	(25,542)	(25,542)	-	-
<b>Total basic own funds after deductions</b>	<b>164,850</b>	<b>114,850</b>	<b>50,000</b>	<b>-</b>
Total eligible own funds to meet the SCR	164,850	114,850	28,713	21,287
Total eligible own funds to meet the MCR	146,812	114,850	28,713	3,249

Own funds are classified into three tiers (Tier 1, 2 and 3). The classification depends on whether they are basic own fund or ancillary own fund items and the extent to which they possess the following characteristics:

- (a) The item is available, or can be called upon on demand, to fully absorb losses on a going concern basis, as well as in the case of winding up (permanent availability); and
- (b) In the case of winding up, the total amount of the item is available to absorb losses and the repayment of the item is refused to its holder until all the obligations towards policy holders and beneficiaries of insurance and reinsurance contracts, have been met (subordination).

The Company's available own fund items have been classified as Tier 1 basic own funds as they are of high quality and are available to absorb losses to enable the Company to continue as a going concern.

Ordinary share capital and the reconciliation reserve are classified as unrestricted Tier 1 within basic own funds and preference shares have been classified as restricted Tier 1. The preference shares qualified as Upper Tier 2 capital under the Solvency I regime but did not meet the full criteria set out in the Solvency II Delegated Regulation to be treated as either Tier 1 or Tier 2 capital under Solvency. The preference shares have transitioned into Solvency II as restricted Tier 1 own funds in accordance with Article 308b (9) of the Solvency II Directive. The transitional period ends on 31 December 2025.

Eligible own funds have been classified as Tier 1 and Tier 2 i.e., some of the restricted Tier 1 amount has been reclassified to Tier 2. This is because only 25% of Tier 1 own funds can consist of hybrid capital items (restricted Tier 1 own funds), for example, preference shares. The excess over this 25% threshold is classified as Tier 2. In addition, in accordance with Article 82, Tier 2 capital cannot exceed 50% of SCR. With the run-off of liabilities, SISE's SCR has fallen and therefore Tier 2 capital is capped reducing the Eligible Own Funds to meet the SCR.

In the case of eligible own funds to meet MCR is lower than the amount eligible to meet SCR because of restriction on Tier 2 own funds i.e. at least 80% of the MCR should be covered by Tier 1 eligible own funds with the balance being Tier 2 eligible own funds.

The available and eligible own funds are made up of ordinary share capital, preference shares and the reconciliation reserve.

The reconciliation reserve relates to accumulated retained earnings as reported in the Company's GAAP financial statements, net of adjustments for valuation differences between the GAAP and Solvency II balance sheet and is therefore subject to volatility. These valuation differences are fully explained in **Section D** above. No adjustment has been made in the reconciliation reserve in respect of foreseeable dividends as none were payable subsequent to the year end. No dividends were paid during the year.

The Company's equity as reported in the audited financial statements was \$186.1m (2021: \$214.5m) compared to own funds as reported above on a Solvency II basis of \$159.6m (2021: \$164.9m). Details of the movement in basic own funds between 2021 and 2022 is shown in the table below:

\$000	Total	Tier 1 Unrestricted	Tier 1 Restricted	Tier 2
Basic own funds as at 31 December 2021	164,850	114,850	50,000	-
GAAP financial statement net loss for the year after tax	(28,335)	(28,335)	-	-
Movement in Solvency II valuation differences	23,037	23,037	-	-
<b>Basic own funds as at 31 December 2022</b>	<b>159,552</b>	<b>109,552</b>	<b>50,000</b>	<b>-</b>

The Company's net assets / basic own funds on a Solvency II basis are \$26.6m (2021: \$49.6m) lower than a LIE GAAP basis. This is an increase of \$23.0 million compared to the prior year and is analysed between a reduction investment valuation difference of \$1.5m and an increase in valuation differences on technical provisions of \$24.5m both of which have had a negative impact on net assets / own funds on a Solvency II basis. Valuation differences on investments relate to differences in the Solvency II fair value valuation basis and LIE GAAP lower of cost or market value basis. The excess of the value of investments on a Solvency II basis compared to on an LIE GAAP has reduced by \$1.5m as a result of the reduction in the size of the investment portfolio.

The excess of the value of net technical provisions on a Solvency II basis compared to their value on an LIE GAAP basis has decreased by \$24.5m to \$26.6m (2021: \$51.1m). This is due to:

- Higher future profits included in premium provisions by \$2.6m (decrease)
- Lower costs of future reinsurance by \$9.0m (decrease)
- Lower expense provision by \$2.0m (decrease)
- Higher impact of discounting by \$6.9m (decrease)
- Lower risk margin by \$4.1m (decrease)

A full reconciliation of the Company's excess of assets over liabilities calculated on a Solvency II basis as at 31 December 2022 is provided in **Section D**.

### E.1.3 Own fund items included under transitional arrangements under Solvency II

As explained in **Section E.1.2**, the preference shares are subject to transitional arrangements under Solvency II.

### E.1.4 Ancillary own funds

The Company has not applied for FMA approval of any Ancillary Own Funds items and therefore no such items are included within own funds.

### E.1.5 Own funds deductions

The Company does not have any ring-fenced funds and has not identified any other deductions or restrictions which need to be made to own funds.



## E.2 SCR and MCR

The Company has complied with the capital requirements imposed by regulators throughout the financial year.

The SCR is determined with reference to the Standard Formula which has been determined to be appropriate given the nature of the Company's underlying risks. Furthermore, it is considered to be consistent and prudent when compared to the Company's Own Economic Assessment of Capital. The SCR is subject to supervisory assessment.

Based on projections for the next 3 years, the Board has concluded that the Company's own funds is expected to exceed its SCR and MCR at all times over this time horizon.

The Company's SCR and MCR are summarised in the following table:

SCR & MCR \$000	2022 Value	2022 %	2021 Value	2021 %	Variance
<b>Risk Categories</b>					
Market risk	10,308	19%	11,269	14%	(961)
Counterparty default risk	16,247	30%	28,875	37%	(12,629)
Non-life underwriting risk	16,950	31%	23,554	30%	(6,603)
Health underwriting risk	295	1%	376	0%	(81)
Operational Risk	9,986	19%	14,996	19%	(5,010)
<b>Undiversified Total</b>	<b>53,786</b>	<b>100%</b>	<b>79,071</b>	<b>100%</b>	<b>(25,284)</b>
Diversification	(10,513)		(14,087)		3,573
<b>SCR</b>	<b>43,273</b>		<b>64,984</b>		<b>(21,710)</b>
<b>MCR</b>	<b>10,818</b>		<b>16,246</b>		<b>(5,428)</b>
<b>Total eligible own funds to meet the SCR</b>	<b>158,576</b>		<b>164,850</b>		<b>(8,950)</b>
Total eligible own funds to meet the MCR	139,103		146,812		(10,385)
<b>Ratio of Eligible Own funds to SCR</b>	<b>366%</b>		<b>254%</b>		<b>106%</b>
<b>Ratio of Eligible Own funds to MCR</b>	<b>1286%</b>		<b>904%</b>		<b>357%</b>

The MCR represents the minimum level of security below which the amount of financial resources should not fall. The MCR is subject to an absolute minimum floor of a fixed Euro amount depending on the lines of business written. In addition, subject to not falling below the absolute floor, the MCR must be no less than 25% of the SCR and no more than 45% of the SCR.

The MCR is calculated as a linear function of the Company's net technical provisions and net written premiums. Pre-determined factors, as provided by EIOPA, are applied to the net technical provisions and net written premiums for each Solvency II line of business. The Company's calculated linear MCR is usually less than 25% of SCR (floor), but higher than the absolute floor of €3.7m (€4.0m from June 2023). Hence the reported MCR is set at 25% of the SCR. The low level of MCR is as a result of the low net technical provisions and net written premiums due to high level of ceding to related reinsurers.

The FMA has not imposed any capital add-ons on the Company as set out in third subparagraph of Article 51(2) of Directive 2009/138/EC.

The 2022 SCR has decreased by \$21.7m since 2021 from \$65.0m to \$43.3m. The Company has adopted a new calculation tool to complete the Q4 2022 SCR calculation. An internal exercise has been completed reproducing the Q4 2021 SCR using the new tool and the tool has received approval from the management risk committee. There is a small immaterial difference between the Q4 2021 figures produced by the old and new calculation tool totalling \$0.4m.

The analysis below shows the key movements since 31 December 2021 comparing against the Q4 2021 figures reproduced using the new calculation tool:

### **Market Risk**

Overall Market Risk has decreased by \$1.0m. The sub-risks have moved as follows:

- \$1.1m reduction in Spread Risk due to change in asset mix with longer duration but better rated bonds. The SCR to Exposure ratio between 2021Q4 and 2022Q4 has remained similar (2022Q4: 2.5%; 2021Q4 2.0%).
- \$1.1m reduction in Currency Risk due to a reduction in exposure.
- \$1.4m increase in Interest Rate Risk driven by an increase in the yield curve upwards shock as specified by EIOPA (which are used in the interest rate calculation).
- \$0.3m increase in concentration risk due an increase in the number of counterparties above the threshold at which concentration risk is calculated.

### **Counterparty Default Risk**

The decrease in counterparty default risk of \$12.6m follows the reduction in reinsurance recoveries of 26% and the reduction in overdue balances of 57%. The Type 2 exposures are penalized in the counterparty default risk and movement in these entries affects the charge. The premium debtors are expected to fall year on year given the Company is in run-off. In addition, the Company has been completing a lot of Debtor/Creditor remediation work over the last 12-18 months which has brought the balance down also.

### **Insurance Risk (Non-life underwriting risk)**

The standard formula calculation for Insurance Risk is based on a combination of Non-Life Underwriting Risk, Cat Risk and Lapse Risk. The \$6.6m decrease in Insurance Risk is primarily driven by:

- a decrease in Non-Cat Premium & Reserve Risk of \$3.8m (22%), driven by a decrease in the premium and reserve aggregate diversified volume of 22%;
- a decrease in Cat Risk of \$4.8m driven by a reduction in premiums due to the run-off of the book;
- offset by an increase in Lapse Risk of \$0.2m as the Company has expected gross future premium primarily relating to Crisis Management and Energy Offshore.

### **Health Risk**

Overall, there is a decrease in Health Risk of \$0.1m as the business runs off. This is expected due to the short-tailed nature of this risk.

### **Operational Risk**

Decrease in Operational Risk by \$5.0m as a result of all other components mentioned above.

### **E.3 Duration-based equity risk sub-module to calculate the SCR**

The Company is not using the duration-based equity risk sub-model set out in Article 304 of the Directive 2009/138/EC for the calculation of its SCR.

## **E.4 Difference between the standard formula and any internal model used**

The Company does not use an internal model to determine its SCR.

## **E.5 Non-compliance with the MCR and non-compliance with the SCR**

The Company remained compliant with the MCR and SCR throughout the year.

## **E.6 Any other information**

There is no other information to report.

## Glossary

Abbreviations	Description
<b>3-LoD</b>	Three Lines of Defence
<b>ADC</b>	Adverse Development Cover
<b>BBNI</b>	Bound But Not Incepted
<b>BCP</b>	Business Continuity Plan
<b>BMA</b>	Bermudan Monetary Authority
<b>COSO</b>	Committee of Sponsoring Organizations of the Treadway Commission
<b>Covid-19</b>	Coronavirus pandemic
<b>CRO</b>	Chief Risk Officer
<b>DAC</b>	Deferred Acquisition Cost
<b>EEA</b>	European Economic Area
<b>EEUL</b>	Enstar EU Limited
<b>EIOPA</b>	European Insurance and Occupational Pensions Authority
<b>ENIDs</b>	Events Not in Data
<b>EPIFP</b>	Expected Profit Included in Future Premiums
<b>ERM</b>	Enterprise Risk Management
<b>EUR</b>	Euro
<b>FCA</b>	Financial Conduct Authority (UK Conduct Regulator)
<b>F&amp;P</b>	Fit and Proper
<b>FCRI</b>	Future Cost of Reinsurance
<b>FMA</b>	Financial Market Authority of Liechtenstein
<b>GBP</b>	Great British Pound
<b>HR</b>	Human Resources
<b>IBNR</b>	Incurred But Not Reported
<b>Cavello Bay</b>	Cavello Bay Reinsurance Ltd (Enstar-owned reinsurer) previously known as Kayla Re Limited
<b>KFH</b>	Key Function Holders
<b>LIE GAAP</b>	Liechtenstein Generally Accepted Accounting Principles
<b>MCR</b>	Minimum Capital Requirement
<b>MGA</b>	Managing General Agent
<b>ORSA</b>	Own Risk and Solvency Assessment
<b>PRA</b>	Prudential Regulatory Authority (UK Prudential Regulator)
<b>PSU</b>	Performance stock unit
<b>QRT</b>	Quantitative Reporting Template
<b>RACE</b>	Risk Appetite, Capital and Exposure
<b>RSU</b>	Restricted stock unit
<b>SCR</b>	Solvency Capital Requirement
<b>SFCR</b>	Solvency and Financial Condition Report
<b>SFL</b>	StarStone Finance Limited
<b>SIBL</b>	StarStone Insurance Bermuda Limited
<b>SII</b>	Solvency II
<b>SISE</b>	StarStone Insurance SE

Abbreviations	Description
<b>SISL</b>	StarStone Insurance Services Limited
<b>SME</b>	Subject Matter Expert
<b>SOX</b>	Sarbanes-Oxley
<b>SROR</b>	Supervised Run-Off Regime
<b>SSHL</b>	StarStone Specialty Holdings Limited
<b>TPA</b>	Third Party Agent
<b>TPR</b>	Temporary Permissions Regime
<b>UPR</b>	Unearned Premium Reserve
<b>USD</b>	United States Dollars



# Appendix 1: Quantitative Reporting Templates

## General information

Undertaking name	StarStone Insurance SE
Undertaking identification code	213800VYKIQKVSXWQ46
Type of code of undertaking	LEI
Type of undertaking	Non-life undertakings
Country of authorisation	LI
Language of reporting	en
Reporting reference date	31 December 2022
Currency used for reporting	USD
Accounting standards	Local GAAP
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

## List of reported templates

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

## S.02.01.02

### Balance sheet

		Solvency II value
		C0010
<b>Assets</b>		
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	84,688
R0080	<i>Property (other than for own use)</i>	0
R0090	<i>Holdings in related undertakings, including participations</i>	0
R0100	<i>Equities</i>	0
R0110	<i>Equities - listed</i>	
R0120	<i>Equities - unlisted</i>	
R0130	<i>Bonds</i>	84,685
R0140	<i>Government Bonds</i>	29,615
R0150	<i>Corporate Bonds</i>	39,728
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	15,343
R0180	<i>Collective Investments Undertakings</i>	3
R0190	<i>Derivatives</i>	
R0200	<i>Deposits other than cash equivalents</i>	0
R0210	<i>Other investments</i>	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	0
R0240	<i>Loans on policies</i>	0
R0250	<i>Loans and mortgages to individuals</i>	
R0260	<i>Other loans and mortgages</i>	
R0270	Reinsurance recoverables from:	395,230
R0280	<i>Non-life and health similar to non-life</i>	395,230
R0290	<i>Non-life excluding health</i>	392,400
R0300	<i>Health similar to non-life</i>	2,829
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	0
R0320	<i>Health similar to life</i>	
R0330	<i>Life excluding health and index-linked and unit-linked</i>	
R0340	<i>Life index-linked and unit-linked</i>	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	8,398
R0370	Reinsurance receivables	128,088
R0380	Receivables (trade, not insurance)	5,912
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	12,687
R0420	Any other assets, not elsewhere shown	17,942
R0500	<b>Total assets</b>	<b>652,945</b>

## 5.02.01.02

### Balance sheet

		Solvency II value
		C0010
<b>Liabilities</b>		
R0510	Technical provisions - non-life	479,184
R0520	<i>Technical provisions - non-life (excluding health)</i>	474,312
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	464,343
R0550	<i>Risk margin</i>	9,969
R0560	<i>Technical provisions - health (similar to non-life)</i>	4,872
R0570	<i>TP calculated as a whole</i>	0
R0580	<i>Best Estimate</i>	4,616
R0590	<i>Risk margin</i>	256
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	0
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	
R0790	Derivatives	
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	
R0830	Reinsurance payables	5,085
R0840	Payables (trade, not insurance)	8,495
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	629
R0900	<b>Total liabilities</b>	493,394
R1000	<b>Excess of assets over liabilities</b>	159,552

## 5.05.01.02

### Premiums, claims and expenses by line of business

#### Non-life

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)							Line of business for: accepted non-proportional reinsurance	Total
Medical expense insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Property		
C0010	C0050	C0060	C0070	C0080	C0090	C0160	C0200	
Premiums written								
R0110	Gross - Direct Business	-23	24	4,376	3,063	202	-671	6,971
R0120	Gross - Proportional reinsurance accepted	0	0	-75	219	-37	352	458
R0130	Gross - Non-proportional reinsurance accepted						33	33
R0140	Reinsurers' share	-18	24	4,238	4,627	243	-281	8,865
R0200	Net	-5	0	63	-1,345	-78	-38	-1,404
Premiums earned								
R0210	Gross - Direct Business	-23	24	4,569	10,451	504	105	15,631
R0220	Gross - Proportional reinsurance accepted	0	0	-70	6,098	-29	496	6,494
R0230	Gross - Non-proportional reinsurance accepted						33	33
R0240	Reinsurers' share	-18	24	4,425	20,279	489	540	25,772
R0300	Net	-5	0	74	-3,731	-14	61	-3,614
Claims incurred								
R0310	Gross - Direct Business	-518	-888	-10,499	13,542	-10,394	863	-7,895
R0320	Gross - Proportional reinsurance accepted	0	-68	26,791	15,571	72	119	42,486
R0330	Gross - Non-proportional reinsurance accepted						128	128
R0340	Reinsurers' share	-423	-810	18,343	29,105	-10,498	1,022	36,870
R0400	Net	-95	-146	-2,051	8	176	-41	-2,151
Changes in other technical provisions								
R0410	Gross - Direct Business							0
R0420	Gross - Proportional reinsurance accepted							0
R0430	Gross - Non-proportional reinsurance accepted							0
R0440	Reinsurers' share							0
R0500	Net	0	0	0	0	0	0	0
R0550	Expenses incurred	204	180	7,352	6,480	2,152	236	16,622
R1200	Other expenses							
R1300	Total expenses							16,622

**S.05.02.01**
**Premiums, claims and expenses by country**
**Non-life**

	C0010	C0020	C0030	C0040	C0050	C0060	C0070
	Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations			Top 5 countries (by amount of gross premiums written) - non-life obligations		Total Top 5 and home country
		US	GB	SK	CR	NL	
	C0080	C0090	C0100	C0110	C0120	C0130	C0140
<b>Premiums written</b>							
R0110 Gross - Direct Business	-6	5,348	814	738	0	515	7,409
R0120 Gross - Proportional reinsurance accepted	0	221	427	0	579	0	1,226
R0130 Gross - Non-proportional reinsurance accepted	0	33	0	0	0	0	33
R0140 Reinsurers' share	-5	2,561	4,871	738	579	726	9,471
R0200 Net	-1	3,040	-3,630	0	0	-211	-802
<b>Premiums earned</b>							
R0210 Gross - Direct Business	-6	7,869	3,502	375	144	760	12,643
R0220 Gross - Proportional reinsurance accepted	0	480	635	0	1,313	7	2,435
R0230 Gross - Non-proportional reinsurance accepted	0	33	0	0	0	0	33
R0240 Reinsurers' share	-5	5,327	7,809	375	1,446	950	15,901
R0300 Net	-1	3,056	-3,672	0	10	-182	-790
<b>Claims incurred</b>							
R0310 Gross - Direct Business	-2,497	2,149	168	1,972	31	624	2,447
R0320 Gross - Proportional reinsurance accepted	3	27,681	10,103	0	-156	116	37,747
R0330 Gross - Non-proportional reinsurance accepted	0	167	-2	0	0	0	165
R0340 Reinsurers' share	-2,173	31,401	9,539	1,941	-462	1,772	42,018
R0400 Net	-322	-1,403	730	31	337	-1,032	-1,659
<b>Changes in other technical provisions</b>							
R0410 Gross - Direct Business	0	0	0	0	0	0	0
R0420 Gross - Proportional reinsurance accepted	0	0	0	0	0	0	0
R0430 Gross - Non-proportional reinsurance accepted	0	0	0	0	0	0	0
R0440 Reinsurers' share	0	0	0	0	0	0	0
R0500 Net	0	0	0	0	0	0	0
R0550 Expenses incurred	-4	6,288	3,103	281	1,093	576	11,336
R1200 Other expenses							
R1300 Total expenses							11,336

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	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Non-proportional property reinsurance	
		C0020	C0060	C0070	C0080	C0090	C0100	C0170	C0180
R0010	Technical provisions calculated as a whole	0	0	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
	Technical provisions calculated as a sum of BE and RM Best estimate								
	Premium provisions								
R0060	Gross	0	0	38	20,697	1,159	1,084	0	22,979
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	0	3	21,035	933	1,632	0	23,603
R0150	Net Best Estimate of Premium Provisions	0	0	36	-338	226	-548	0	-624
	Claims provisions								
R0160	Gross	4,616	3,221	96,679	194,768	135,186	7,082	4,428	445,980
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	2,829	2,233	81,894	164,069	112,551	5,300	2,750	371,627
R0250	Net Best Estimate of Claims Provisions	1,787	987	14,785	30,699	22,635	1,782	1,678	74,353
R0260	Total best estimate - gross	4,616	3,221	96,718	215,465	136,345	8,166	4,428	468,959
R0270	Total best estimate - net	1,787	987	14,821	30,361	22,861	1,235	1,678	73,730
R0280	Risk margin	256	49	1,526	2,118	5,780	496	0	10,225
	Amount of the transitional on Technical Provisions								
R0290	Technical Provisions calculated as a whole								0
R0300	Best estimate								0
R0310	Risk margin								0
R0320	Technical provisions - total	4,872	3,270	98,243	217,583	142,125	8,663	4,428	479,184
	Recoverable from reinsurance contract/SPV and								
R0330	Finite Re after the adjustment for expected losses due to counterparty default - total	2,829	2,234	81,897	185,104	113,484	6,931	2,750	395,230
R0340	Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	2,043	1,037	16,346	32,479	28,642	1,731	1,678	83,955



S.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020

Accident year / underwriting year Underwriting Year

Gross Claims Paid (non-cumulative) (absolute amount)													
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
Year	Development year											In Current year	Sum of years (cumulative)
	0	1	2	3	4	5	6	7	8	9	10 & +		
R0100 Prior											62,008	62,008	62,008
R0160 2013	14,118	68,637	29,302	17,749	9,330	13,031	14,953	4	2,663	7,332		7,332	177,120
R0170 2014	3,855	29,802	23,114	16,669	14,316	7,977	8,319	4,531	-4,051			-4,051	104,533
R0180 2015	2,481	12,785	13,968	15,575	11,718	3,338	4,399	12,435				12,435	76,699
R0190 2016	4,902	18,983	18,220	12,623	10,845	6,154	8,832					8,832	80,559
R0200 2017	4,914	45,431	27,766	31,002	11,597	8,205						8,205	128,916
R0210 2018	12,136	62,244	34,769	18,073	21,825							21,825	149,047
R0220 2019	8,037	38,951	21,698	6,986								6,986	75,672
R0230 2020	8,803	17,759	9,821									9,821	36,383
R0240 2021	0	0										0	0
R0250 2022	0											0	0
R0260													
Total												133,393	890,937

Gross Undiscounted Best Estimate Claims Provisions (absolute amount)												
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
Year	Development year											Year end (discounted data)
	0	1	2	3	4	5	6	7	8	9	10 & +	
R0100 Prior											90,359	84,860
R0160 2013	0	0	0	39,657	15,889	63,116	45,601	33,882	39,662	37,753		34,397
R0170 2014	0	0	57,138	22,007	35,358	38,689	42,440	38,698	30,474			27,799
R0180 2015	0	38,006	34,450	47,331	39,383	40,788	40,523	38,380				34,435
R0190 2016	22,110	19,591	53,660	54,042	58,901	56,012	50,569					45,306
R0200 2017	22,678	82,268	86,431	66,573	74,620	58,996						52,965
R0210 2018	53,460	125,699	124,168	104,148								93,180
R0220 2019	50,173	98,383	66,241	51,146								45,665
R0230 2020	60,143	55,420	31,068									27,373
R0240 2021	0	0										0
R0250 2022	0											0
R0260												
Total												445,980

**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	<b>Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds</b>
R0230	<b>Deductions for participations in financial and credit institutions</b>
R0290	<b>Total basic own funds after deductions</b>
<b>Ancillary own funds</b>	
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	<b>Total ancillary own funds</b>
<b>Available and eligible own funds</b>	
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	<b>SCR</b>
R0600	<b>MCR</b>
R0620	<b>Ratio of Eligible own funds to SCR</b>
R0640	<b>Ratio of Eligible own funds to MCR</b>
<b>Reconciliation reserve</b>	
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	<b>Reconciliation reserve</b>
<b>Expected profits</b>	
R0770	Expected profits included in future premiums (EPIFP) - Life business
R0780	Expected profits included in future premiums (EPIFP) - Non- life business
R0790	<b>Total Expected profits included in future premiums (EPIFP)</b>

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
140,393	140,393		0	
0	0		0	
0	0		0	
0		0	0	0
0	0			
50,000		50,000	0	0
0		0	0	0
-30,841	-30,841			
0		0	0	0
0				0
0	0	0	0	0
0				
0				
159,552	109,552	50,000	0	0
0				
0				
0				
0				
0				
0				
0				
0			0	0
159,552	109,552	50,000	0	0
159,552	109,552	50,000	0	
158,576	109,552	27,388	21,637	0
139,103	109,552	27,388	2,164	
43,273				
10,818				
366.45%				
1285.81%				
C0060				
159,552				
0				
190,393				
0				
-30,841				
475				
475				



## S.25.01.21

### Solvency Capital Requirement - for undertakings on Standard Formula

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0120
R0010 Market risk	10,308		
R0020 Counterparty default risk	16,247		
R0030 Life underwriting risk	0		
R0040 Health underwriting risk	295		
R0050 Non-life underwriting risk	16,950		
R0060 Diversification	-10,513		
R0070 Intangible asset risk	0		
R0100 <b>Basic Solvency Capital Requirement</b>	<b>33,287</b>		
<b>Calculation of Solvency Capital Requirement</b>			
R0130 Operational risk	9,986		
R0140 Loss-absorbing capacity of technical provisions	0		
R0150 Loss-absorbing capacity of deferred taxes			
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200 <b>Solvency Capital Requirement excluding capital add-on</b>	<b>43,273</b>		
R0210 Capital add-ons already set	0		
R0220 <b>Solvency capital requirement</b>	<b>43,273</b>		
<b>Other information on SCR</b>			
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		
<b>Approach to tax rate</b>			
R0590 Approach based on average tax rate	0		
<b>Calculation of loss absorbing capacity of deferred taxes</b>			
R0640 LAC DT			
R0650 LAC DT justified by reversion of deferred tax liabilities	0		
R0660 LAC DT justified by reference to probable future taxable economic profit	0		
R0670 LAC DT justified by carry back, current year	0		
R0680 LAC DT justified by carry back, future years	0		
R0690 Maximum LAC DT	0		

#### USP Key

##### For life underwriting risk:

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

##### For health underwriting risk:

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

##### For non-life underwriting risk:

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

# 5.28.01.01

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

<b>Linear formula component for non-life insurance and reinsurance obligations</b>		C0010			
R0010	MCR <sub>nl</sub> Result		7,433		
				Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
				C0020	C0030
R0020	Medical expense insurance and proportional reinsurance			1,787	0
R0030	Income protection insurance and proportional reinsurance			0	0
R0040	Workers' compensation insurance and proportional reinsurance			0	0
R0050	Motor vehicle liability insurance and proportional reinsurance			0	0
R0060	Other motor insurance and proportional reinsurance			987	0
R0070	Marine, aviation and transport insurance and proportional reinsurance			14,821	63
R0080	Fire and other damage to property insurance and proportional reinsurance			30,361	0
R0090	General liability insurance and proportional reinsurance			22,861	0
R0100	Credit and suretyship insurance and proportional reinsurance			1,235	0
R0110	Legal expenses insurance and proportional reinsurance			0	0
R0120	Assistance and proportional reinsurance			0	0
R0130	Miscellaneous financial loss insurance and proportional reinsurance			0	0
R0140	Non-proportional health reinsurance			0	0
R0150	Non-proportional casualty reinsurance			0	0
R0160	Non-proportional marine, aviation and transport reinsurance			0	0
R0170	Non-proportional property reinsurance			1,678	0
<b>Linear formula component for life insurance and reinsurance obligations</b>		C0040			
R0200	MCR <sub>l</sub> Result		0		
				Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
				C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits				
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				
<b>Overall MCR calculation</b>		C0070			
R0300	Linear MCR		7,433		
R0310	SCR		43,273		
R0320	MCR cap		19,473		
R0330	MCR floor		10,818		
R0340	Combined MCR		10,818		
R0350	Absolute floor of the MCR		3,966		
R0400	Minimum Capital Requirement		10,818		

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