

PAMIA LIMITED
SOLVENCY AND FINANCIAL CONDITION REPORT (SFCR)

FOR THE YEAR ENDED 30 JUNE 2019

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SUMMARY

The harmonised EU-wide regulatory regime for Insurance Companies, known as Solvency II, came into force with effect from 1 January 2016. The regime requires new reporting and public disclosure arrangements to be put in place by insurers and some of that is required to be published on PAMIA Limited; (the Company) public website.

This report covers the Business and Performance of the Company, its System of Governance, Risk Profile, and Valuation for Solvency Purposes, Capital Management and required Quantitative Reporting Templates. The ultimate Administrative Body that has the responsibility for all of these matters is the Company's Board of Directors, with the help of various governance and control functions that it has put in place to monitor and manage the business.

The Company's financial year runs to 30 June each year and it reports its results in GBP-Pound Sterling.

For Solvency purposes the Company uses the standard formula to calculate its Solvency Capital Requirement (SCR) and as a mutual mono line insurer providing professional indemnity insurance to patent attorneys and trade mark attorneys. The Company's insurance business is classified as General Liability business for Solvency II purposes. All business is underwritten from the United Kingdom.

By far the largest risk the Company faces as an insurance company is a severe reversal in what has in recent years been a relatively benign claims experience. The claims history demonstrates that, quite unexpectedly, claims can climb to levels that could have an impact on its financial strength were it not adequately reserved.

Accordingly, the Company has always adopted a conservative approach to its operations. This is in order to ensure that it has strong reserves that are capable of absorbing any exaggerated developments in its claims experience without future Members having to pay for the claims of their predecessors. It also helps in ensuring that the Company has time to react to any unexpected increases in its costs base (the cost of reinsurance for example), or its regulatory capital requirement, without having to take drastic unplanned measures.

PAMIA LIMITED

SUMMARY (continued)

At the same time, however, the Board is highly conscious of not accumulating reserves in excess of what a sensible degree of prudence requires. To this end, and as part of its Risk Appetite Statement, the Board formulated and has for some years applied a consistent policy to the amount of capital reserves it should hold above its regulatory capital requirement to ensure that it has enough to absorb any unexpected shocks but not too much. The policy is to capital reserves between £5m and £7.750m in excess of the Regulatory Solvency Capital Requirements. (its SCR)

	Year ended 30 June 2019	13 months to 30 June 2018
	£'000	£'000
Solvency Capital Requirement	5,642	5,273
Minimum buffer	5,000	5,000
Minimum Limit	10,642	10,273
Maximum buffer	2,750	2,750
Maximum limit	13,392	13,023
Capital Reserves for Regulatory Purposes	15,040	15,101
Excess over maximum capital requirements	1,648	2,078

As part of its Risk Appetite Statement, where the Company's capital reserves exceed the upper end of the target range set in its capital resources policy, it is required to manage its free reserves into the target range over a reasonable period of time. To achieve this, it can reduce the rates it sets or increase the level of premium deferral granted to Members, or it can do both. Thus, for the 2019 renewal, and without departing from its underwriting criteria the Board decided to hold the 2018 premium and deferral rates

During the year under review the Company suffered a deficit of £0.057m as reported in its annual financial statements under UK GAAP. This deficit was due to several factors. The first factor being the Board decision to reduce premium rates, the second factor was the increased amounts of claims paid. The effect of these factors was partly offset by performance of its investment portfolio which generated returns of 3.13% despite the current market volatility. The reinsurance premium of £1.1m remains unchanged from last year and is due to PAMIA's very good claims record and the continuing soft market conditions for reinsurance rates.

Free reserves of the Company as at 30 June 2019 now stand at £15.654m.

For solvency purposes, the Company's Regulatory capital reserves are £15.040m and its Solvency Capital Requirement (SCR) is £5.642m; at the year end the Company exceeds its SCR by £9.398m (ratio of 267%).

The Company's Minimum Capital Requirement (MCR) has been calculated at £3.288m; at the year end the Company exceeds its minimum capital requirement by £11.752m (ratio of 457%).

DIRECTORS REPORT

Directors' Responsibilities

We acknowledge our responsibility for preparing the Solvency and Financial Condition Report in all material respects in accordance with the PRA Rules and the Solvency II Regulations. The Solvency II Directive, the Delegated Acts, related Implementation Rules, Technical Standards and Guidelines, as well as PRA rules provide the regulatory framework in which the Company operates. The Solvency II rules and regulations include, but are not limited to, the recognition and measurement of its assets and liabilities including Technical Provisions and Risk Margin, the calculation of its capital requirement and the reporting and disclosures of the Solvency II results.

Directors' Statement

We are satisfied that:

- throughout the financial period in question, the Company has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable to the insurer; and
- it is reasonable to believe that the Company has continued so to comply subsequently and will continue so to comply in future.

Statement of disclosure of information to auditors

In accordance with Section 418 of the Companies Act 2006, each of the persons who is a director in office at the date this report is approved, confirms that: (a) so far as each of them is aware, there is no relevant audit information of which the auditors are unaware; and (b) each of them has taken all the steps that he ought to have taken as a director in order to make himself aware of any relevant audit information and to establish that the auditors are aware of that information.

By order of the Board



Rajiv Harnal
Chief Financial Officer
PAMIA Limited
4 October 2019

PAMIA LIMITED

AUDITORS REPORT

Report of the external independent auditor to the Directors of PAMIA Limited ('the Company') pursuant to Rule 4.1 (2) of the External Audit Chapter of the PRA Rulebook applicable to Solvency II Firms.

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

Opinion

Except as stated below, we have audited the following documents prepared by PAMIA Limited as at 30 June 2019:

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Solvency and Financial Condition Report of PAMIA Limited as at 30 June 2019, ('the Narrative Disclosures subject to audit'); and
- Company templates S02.01.02, S17.01.02, S23.01.01, S25.01.21, S28.01.01 ('the Templates subject to audit').

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

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

- The 'Business and performance', 'System of governance' and 'Risk profile' elements of the Solvency and Financial Condition Report;
- Company templates S05.01.02, S05.02.01, S19.01.21; and
- The written acknowledgement by management of their responsibilities, including for the preparation of the solvency and financial condition report ('the Responsibility Statement').

To the extent the information subject to audit in the relevant elements of the Solvency and Financial Condition Report includes amounts that are total, sub-total or calculations derived from the Other Information, we have relied without verification on the Other Information.

In our opinion, the information subject to audit in the relevant elements of the Solvency and Financial Condition Report of PAMIA Limited as at 30 June 2019 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals and determination.

AUDITORS REPORT (continued)

Basis for opinion

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

Conclusions relating to going concern

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

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

Emphasis of Matter – Basis of Accounting

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

Other Information

The Directors are responsible for the Other Information.

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

AUDITORS REPORT (continued)

Other Information (continued)

In connection with our audit of the Solvency and Financial Condition Report, our responsibility is to read the Other Information and, in doing so, consider whether the Other Information is materially inconsistent with the relevant elements of the Solvency and Financial Condition Report, or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the relevant elements of the Solvency and Financial Condition Report or a material misstatement of the Other Information. If, based on the work we have performed, we conclude that there is a material misstatement of this Other Information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Directors for the Solvency and Financial Condition Report

The Directors are responsible for the preparation of the Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations.

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

Auditor's Responsibilities for the Audit of the relevant elements of the Solvency and Financial Condition Report

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

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

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: www.frc.org.uk/auditorsresponsibilities.

The same responsibilities apply to the Audit of the Solvency and Financial Condition Report.

PAMIA LIMITED

AUDITORS REPORT (continued)

Report on Other Legal and Regulatory Requirements.

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

Use of our Report

This report is made solely to the Directors in accordance with Rule 2.1 of External Audit Chapter of the PRA Rulebook for Solvency II firms. Our work has been undertaken so that we might report to the Directors those matters that we have agreed to state to them in this report and for no other purpose. To the fullest permitted by law, we do not accept or assume responsibility to anyone other than the Directors, for our work, for this report, or for the opinions we have formed

PKF Littlejohn LLP

PKF Littlejohn LLP
Statutory Auditor
15 Westferry Circus
Canary Wharf
London
E14 4HD

4 October 2019

PAMIA LIMITED

A. BUSINESS AND PERFORMANCE

A.1. BUSINESS

PAMIA Limited ('the Company') is a company limited by guarantee regulated by the Prudential Regulation Authority ("PRA") and the Financial Conduct Authority ("FCA"). The Directors of the Company are responsible for ensuring that the business is operated at all times in accordance with the requirements of the PRA and FCA, as well as discharging their fiduciary and statutory duties. The PRA is located at 20 Moorgate, London, EC2R 6DA, United Kingdom and the FCA at 25 Endeavour Square, London, E20 1JN, United Kingdom.

The Company is incorporated in England as a Company limited by guarantee and not having share capital. In the event of liquidation, the net assets of the Company are to be distributed amongst such Members as per the rules set out in the Articles of Association.

The external auditors of the Company are PKF Littlejohn LLP situated at 15 Westferry Circus, Canary Wharf, London, E14 4HD.

PAMIA is a mutual insurance company providing profession indemnity insurance to patent attorneys and trade mark attorneys. PAMIA has set strict eligibility criteria to determine who is eligible to apply to be insured to ensure that the firms and individuals it insures are a compatible risk. PAMIA provides insurance under the same terms to everyone it insures.

During the year there has been no business or other unusual or unexpected events that have had a material impact on the Company.

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A.2. UNDERWRITING PERFORMANCE

All of the Company's business is underwritten from the UK. The Company writes only one line of business which is to provide professional indemnity insurance to patent attorneys and trade mark attorneys.

For the twelve months to 30 June 2019, the Company produced a deficit of £0.057m as detailed further in the table below which is a summary of the Company's technical account reported on a UK GAAP basis.

The table below compares the key financial information from the twelve months 2019 financial period with the corresponding figures from the thirteen months 2018 financial year.

	2019 £'000	2018 £'000
Premium Written	2,282	2,328
Reinsurance Premium	(1,100)	(1,100)
Net claims	(901)	(873)
Operating expenses	(784)	(832)
Surplus/(deficit) on technical account	(503)	(476)
Investment Income	545	253
Surplus/(deficit) on ordinary activities before tax	42	(223)
Tax (charged)/credited	(99)	68
Surplus/(deficit) for the financial year	(57)	(155)
Free reserves at year end	<u>15,654</u>	<u>15,711</u>

Premium rates have reduced due to the Board decision to reduce rates given to members as part of its capital management policy to maintain its free reserves within the agreed bands, but have been offset by increased fee income declared by Members.

Reinsurance premium have remained unchanged from last year.

Net claims incurred are up from last year and reflect the general nature of the business with no particular trends developing. The Company is protected against the incidence of claims by reinsurance contracts. In respect of the period ended 30 June 2019 the Company had reinsurance cover relating to claims and settlement costs of £5m in excess of £0.4m each and every claim but limited to £2.3m ultimate net loss in the aggregate including costs and expenses.

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A.2. UNDERWRITING PERFORMANCE (continued)

Operating expenses are reduced from last year reflecting the fact that the period end was for a thirteen month period.

Investments

PAMIA requires its investment portfolio to be invested in a manner which assists it in maintaining its financial strength by preserving capital to meet its liabilities and delivering positive investment returns over the medium term to subsidise premiums.

PAMIA's assets are divided between a Short Term Fund, a Capital Fund and a Growth Fund. The breakdown is shown below:

	30 June 2019	30 June 2018
	£'000	£'000
Short Term Fund	1,420	2,806
Capital fund	9,941	9,718
Growth Fund	10,071	9,675
Market value (including accrued interest)	<u>21,432</u>	<u>22,199</u>

The purpose of the Short Term Fund is to provide liquidity to meet PAMIA's projected operating cash flow requirements over the period of 12 months.

The purpose of the Capital Fund is to cover PAMIA's claims liabilities and regulatory capital requirements. In this context, "claims liabilities" does not include the run-off claims handling reserve.

The purpose of the Growth Fund is to hold free reserves for investment in riskier assets to generate positive returns over the medium term.

The investment return for the period under review was 3.13% (2018: of 1.68%).

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A.3. INVESTMENT PERFORMANCE

In accordance with the Investment policy, the investment mandate is updated on a regular basis, with a full review taking place every three years.

The following table details the Company's investment income by asset class as reported in the Company's UK GAAP financial statements:

	12 months to 30 June 2019 £'000	13 months to 30 June 2018 £'000
<u>Assets</u>		
Fixed interest Securities	9,112	8,269
Equities & Alternatives	9,963	9,191
UCITS	2,357	4,685
	<u>21,432</u>	<u>22,145</u>
	12 months to 30 June 2019 £'000	13 months to 30 June 2018 £'000
Interest on listed investments	523	519
Gain /(loss) on foreign exchange	34	(143)
Bank deposit interest	2	6
	<u>559</u>	<u>382</u>
Gains/(losses) on realisation of investments	(67)	833
	<u>492</u>	<u>1,215</u>

Expenses related to the management of these investments were £8k for the year (2018: £7k).

The Income and Expenditure account and movement in reserves may be seen on page 17 of the Company's Annual Report and Financial Statements.

A.4. PERFORMANCE OF OTHER ACTIVITIES

The Company has no other activities other than its main insurance activities presented in A.2

A.5. ANY OTHER INFORMATION

There have been no other material matters affecting business and performance.

B. SYSTEM OF GOVERNANCE

B.1. GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE

B1.1 Overview

The Board of Directors

Ultimate responsibility for the governance of the Company rests with the Board of Directors. The Company's Directors are drawn from patent and trade mark attorney's within the Membership. The Directors meet three times a year. The Articles and the Rules give the Board of Directors wide powers to manage the affairs of the Company and also set out how these powers are to be exercised.

All the Directors are Members of the Company other than the Chief Executive Officer and Chief Financial Officer who are employed by Thomas Miller, Managers of the Company.

Although the Managers administer the business of the Company on a day-to-day basis, ultimate responsibility remains with the Directors.

The following items come up annually for consideration at Board Meetings:

- Reinsurance for the next policy year;
- Rates charged to Members and the terms of insurance;
- Approval of the Annual Report and the audited Financial Statements for the previous year;
- Investment policy;
- Approval of Regulatory returns;
- Claims development;
- Reserving;
- Business risk review.

The Managers present the items on the Agenda which the Board then considers.

The Articles allow the Directors to delegate any of their powers to Committees, although the Committee must then conform to any conditions put on it by the Directors.

B1.1.1 Committees

The following committees aid the Board in its duties:

Audit & Risk Committee assists the Board in recommending the approval of the Financial Statements, and year end claims reserves. The Committee ensures that the Company complies and meets all legal and regulatory requirements. It is responsible for assessing the Business Risk of the Company. It is also responsible for internal and external audit appointments and to provide a clear channel of communication between the Board and the auditors.

Canada Committee assists the Board in considering the feasibility of Insuring Canadian patent and trademark Attorneys.

The Claims Committee assists the Board in reviewing in detail PAMIA's notifications and claims on an anonymised basis and making recommendations to the Managers as steps that might be taken to resolve them satisfactorily. The Committee assists the Board in identifying specific or general risks emerging from claims against Members.

B.1. GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE (continued)

B1.1.1 Committees (continued)

Investment Committee assists the Board in reviewing in detail the performance of PAMIA's investments and make recommendations to the Board in respect of the Investment Policy, Investment Mandate and other investment related issues.

Management Committee is responsible for monitoring the performance and effectiveness of PAMIA, including general oversight of the Managers and the effectiveness of the Board. The Committee is also the focal point for PAMIA's external relationships, including Members and organisations such as Intellectual Property Regulation Board (IPREG), Chartered Institute of Patent Attorneys (CIPA) and Chartered Institute of Trade Mark Attorneys (CITMA).

Management Fee Committee assists the Board to determine the Management Fee to be paid to the Managers.

The Nominations Committee advises the Board on the appointment and retention of Directors and Consultants and assist the Managers in providing guidance to Directors on their responsibilities.

The Rating & Reinsurance Committee assists the Board in reviewing the rating structure and reinsurance programme, make annual recommendations to the Board in respect of the same and oversee the performance of the Insurance Consultants.

Rules and Cover Committee helps determine the entry requirements for PAMIA membership, reviews PAMIA's Memorandum and Articles of Association, reviewing terms of cover offered to members, determines the terms of engagement with the Managers, Investment Managers and Insurance Consultants, ensures consistency of between the reinsurance cover and terms of cover provided to members and ensuring that the cover provided to Members is consistent with the minimum terms set by IPREG.

B1.1.2 Key functions

The Managers

The Company has no employees and as such the Board relies on the Managers for the day-to-day management duties of the Company. The functions and responsibilities of the Managers are set out in the Management Agreement between the Managers and the Company.

The Board may delegate a wide range of powers, duties and discretions to the Managers on such terms as it sees fit. The Managers shall be entitled to attend meetings of the Directors and of committees of the Directors and General meetings of the Company unless the Directors otherwise require.

The Managers have for many years discharged the role of Chief Executive Officer and Chief Financial Officer to PAMIA given their day to day proximity to the Company's operations. However, the Small Business, Enterprise and Employment Act 2015 abolished corporate directorships and all directors are now required to be natural persons. In preparation for the change the Company's Articles of Association were amended in 2015. The Articles now allow representatives of our Managers to be appointed to the positions of Chief Executive Officer and Chief Financial Officer.

B.1. GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE (continued)

B1.1.2 Key functions (continued)

The Investment Managers

Investment of the Company's funds is conducted by the Investment Managers in accordance with the Board's Investment Policy and is subject to internal compliance procedures.

The functions and responsibilities of the Investment Managers are set out in the Management Agreement between the Investment Managers and the Company.

Responsibilities Map

The Company maintains a governance map that details the key Senior Manager Functions and Key Functions. The following functions are maintained through the Responsibilities Map with a prescribed set of responsibilities:

- Chairman (Board)
- Chief Executive Officer (Managers)
- Chief Financial Officer (Managers)
- Chief Operations Function (Managers)
- Chief Risk Officer (Managers)
- Head of Internal Audit (Managers)
- Chief Actuary (Managers)
- Compliance Officer (Managers)
- Money Laundering Reporting Officer (Managers)

B.1.2. Remuneration

Directors receive no annual or attendance fee.

The Company has no internal executive function and its management is wholly performed by companies within the Thomas Miller Holdings Ltd group of companies. The Managers are responsible for recruitment in line with the Thomas Miller Group Recruitment Policy and performance management, ensuring that all staff have and maintain the relevant skills, knowledge and expertise necessary to perform their roles and responsibilities. The Managers' remuneration is paid for by Thomas Miller.

The Company pays the Managers a fixed fee for the management of PAMIA.

B.1.3. Related party transactions

The Company has no share capital and is controlled by the Members who are also the insureds. There have been no related party transactions between the Company and its members outside the normal course of business.

All the Directors are Members of the Company other than the Chief Executive Officer and Chief Financial officer who are employed by Thomas Miller, Managers of Thomas Miller Professional Indemnity. Other than their own insurance the Directors have no financial interests in the Company, the Member Directors received no remuneration for their services to the Company.

B.1. GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE (continued)

B.1.3. Related party transactions (continued)

No such related party transactions have occurred during the year.

B.1.4. Adequacy of the system of governance

The Directors consider the system to be adequate given the nature, scale and complexity of the risks inherent to the Company. There have been no material changes in the Company's system of governance during the reporting period.

B.2. FIT AND PROPER REQUIREMENTS

The Company has in place a Fit & Proper Policy that sets out its approach to the fitness and propriety of the persons responsible for running the Company, including executive senior management and key function holders.

All persons within the scope of the Company's Fit and Proper policy must have the professional qualifications, knowledge and experience and demonstrate the sound judgement necessary to discharge their areas of responsibility competently, both at the time of their appointment or employment and on a continuous basis to meet the changing or increasing requirements of their particular responsibilities and the business in general.

They must be of good repute and demonstrate in their personal behaviour and business conduct character, integrity and honesty. As part of the assessment consideration will be given to potential conflicts of interest and financial soundness. The level of fitness must be appropriate and proportionate to each person's role, tasks and responsibilities.

The Board must be composed in a way to ensure that its members collectively possess sufficient knowledge, competence and experience to direct and oversee the Company's affairs effectively.

The Managers maintain role specifications for all executive roles that are within the scope of the Fit and Proper policy which detail the key competencies and duties for each position. All persons to whom the policy applies are required to have the appropriate and designated competencies for their positions.

Fit and proper assessments are carried out by the Chairman, the Company Manager or the Compliance Officer. No person is permitted to undertake their own assessment.

B.3. RISK MANAGEMENT SYSTEM

PAMIA uses a Risk Management Framework to design an effective risk management system with an integrated approach to risk management and the application of the three lines of defence:

1st line of defence: business functions, process and risk owners

2nd line of defence: risk management and compliance functions

3rd line of defence: internal / external audit

The risk management system includes:

- a clearly defined and well-documented risk management strategy;
- adequate written policies;
- appropriate processes and procedures;
- appropriate reporting procedures;
- reports on the material risks faced by PAMIA and on the effectiveness of the risk management system;
- a suitable Own Risk and Solvency Assessment (ORSA);
- underwriting and reserving risk;
- market risk (including investment, asset-liability management, liquidity and concentration risks);
- reinsurance and other risk mitigation techniques;
- credit risk; and
- operational risk.

The risk management system not only covers the risks included in the calculation of the Solvency Capital Requirement but also other risks to which PAMIA is exposed and which are considered to be materially relevant to its business.

The risk management system also has a coherent focus on data and IT infrastructure governance and appropriate policies and standards to outline the framework within which responsibilities will be exercised. It is supported by a robust internal control system and is designed to identify measure, manage, monitor and report significant risks to the achievement of our business objectives. The core elements of the risk management framework are as follows:

Risk Management Strategy

The objectives of PAMIA's risk management strategy are to identify measure, monitor, manage, and report in a consistent, continuous and timely fashion, on the basis of PAMIA's risk appetite as set by the Board.

The Risk Management Framework helps both support and relay PAMIA's business plan strategy throughout the organisation by ensuring that those factors that may advance or impede the achievement of strategic and operational objectives are managed by strong controls. The risks to which PAMIA is exposed are recorded in the Business Risk Assessment.

Forecasts and long-term projections of how the business needs to develop and which internal and/or external factors might affect or impede such development are considered when carrying out business strategy reviews. Risk related to initiatives and objectives adopted in the business plan are added to the Business Risk Assessment.

B.3. RISK MANAGEMENT SYSTEM (continued)

Implementation of the Risk Management Strategy: Risk Policies and Procedures

PAMIA's strategy is specified in more detail through its policies and business plan which underpin its day-to-day business. Policies have been developed for all material risks to which PAMIA is exposed. They define PAMIA's approach to risk management overall and more specifically the risk for which the policy has been written. The policies establish the controls, procedures, limits and escalation to ensure that the risks are managed in line with risk appetite. Specific procedures, where appropriate, have been developed to provide full understanding of the means by which the first and second lines of defence will implement the strategy. Policies are reviewed on an annual basis. Policies and related procedures are stored on the Managers' Electronic Quality Management System and are accessible to PAMIA's Managers and all staff in PAMIA's three lines of defence structure.

The policies also include appropriate reporting procedures to ensure that information relating to the component elements of risk management is routinely reported to the Audit & Risk Committee and to the Board.

Risk Appetite

PAMIA's Risk Appetite is articulated in the risk appetite statement, which is a document owned by the Board and reviewed on a regular basis as new risks emerge, or at least annually. PAMIA's business strategy is aligned to the Business Plan and focuses on the following areas:

- We will remain the leading provider of professional indemnity insurance to qualifying practices, maintaining our current market position.
- We will continue to provide high quality cover and services, looking to broaden the cover where to do so are compatible with providing insurance on a mutual basis.
- We will consider opportunities to provide insurance to patent attorneys and trade mark attorneys in other common law jurisdictions where we consider it in the interests of current members to do so.

The Board determines the appropriate risk appetite and sets PAMIA's risk strategy. It has developed high-level risk appetites that will be used by the Board to monitor the implementation of the risk strategy. More detailed operational preferences and tolerances are used by the Managers to implement the risk strategy. These are reported to the Board as part of PAMIA's Own Risk & Solvency Assessment (ORSA) and in Risk Reports as and when tolerances are breached.

The Board bears ultimate responsibility for the management of risk and for maintaining a sound system of internal control that supports the achievement of the business strategy, policies, aims and objectives of PAMIA. The Audit & Risk Committee supports the Board by providing oversight of the Risk Management Function.

B.3. RISK MANAGEMENT SYSTEM (continued)

Business Risk Assessment: Measurement and Management

Risks to the business that could inhibit PAMIA achieving its business plan objectives are described in the Business Risk Assessment, together with the consequences should the risk materialise. The risks are categorised into categories (see below) and assessed and monitored on an ongoing basis.

Emerging Risk Log

As explained later “Risk Reporting Procedures”, Risk Owners are required to consider a template of questions as part of a regular process of reporting. Included in the questions posed to Risk Owners is whether they have identified potential emerging risks during the reporting period. These are then discussed at a Manager’s Management Committee meeting (which meets quarterly) and included in the Business Risk Assessment which is reviewed at least annually by the Audit & Risk Committee.

Risk Categories

The Business Risk Assessment includes the following categories of risk:

- Underwriting
- Reserving
- Counterparty / Credit Risk
- Market (including Investment, Asset-Liability Management, Liquidity and Concentration risks)
- Operational (to include)
 - Operational Controls
 - Financial
 - Information Technology
 - Compliance / Regulatory / Legal
- Emerging

Risk Rating

A rating for each risk is determined by assessing its likelihood (being the likely probability of an occurrence) and impact (being a financial assessment of the significance of the event if it occurs, which includes reputational, legal/regulatory and other measures). Each is presented as a value between 1 and 5 (1 being low and 5 being high) in line with a likelihood/impact matrix with financial impact levels. Risks are defined as Red, Amber, Yellow or Green according to a heat map to assist the Board with the prioritisation of the management of risks and demonstrate the importance of the mitigation or controls in place.

The assessment of each risk is on the basis of Inherent Risk and Residual Risk (i.e. the risk that remains after taking into account the strength of current risk management procedures that are in place).

All risks on the Business Risk Assessment are re-assessed on an ongoing basis and at least annually by the Managers and by the Audit & Risk Committee. The Managers, in collaboration with the Risk Officer, consider the Business Risk Assessment in the light of changes to the business plan.

B.3. RISK MANAGEMENT SYSTEM (continued)

The Managers and Risk Owners

Each risk on the Business Risk Assessment has a Risk Owner whose responsibilities are:

- To identify and evaluate the risks faced by PAMIA in the area for which the Risk Owner is responsible, providing adequate information on the status of risks (including substantive changes to or deterioration of existing risks and new or emerging risks and loss/near miss events).
- To implement and uphold policies and procedures on risk management and internal control on a continuous basis.
- To maintain continuous oversight of the status of risks and controls and initiate improvements in design and operation of controls where required.
- To consider the level of risk presented by any proposed initiative in furtherance of business plan objectives.
- To submit risk-based reports to meetings of the various Committees.
- To review the Business Risk Assessment and draw up recommendations for additions, deletions and amendments.
- To assess the likelihood of the risk occurring and its impact and recommend changes, as appropriate.
- To consider the effectiveness of the controls.

Own Risk and Solvency Assessment ("ORSA")

Every year, and on an ad hoc basis, if circumstances materially change, PAMIA prepares an ORSA overview report. The ORSA is the process used by PAMIA to manage its financial and solvency position over the period of its Business Plan and the ORSA overview report is the culmination of this process into a report reviewed by the Board. As such, it is an intrinsic part of PAMIA's Business Planning Process.

The key elements of the ORSA process are:

- An analysis of PAMIA's recent performance
- Assessment of PAMIA's risk profile
- Consideration of business planning and stress scenarios

The Audit & Risk Committee reviews the ORSA and recommends it for approval and use by the Board.

The Board reviews the ORSA and considers appropriate action such as:

- Capital related decisions
- Rating considerations
- Reassessment of risk profile and risk appetite
- Additional risk mitigating actions

The Assessments to date indicate that PAMIA is adequately capitalised.

B.3. RISK MANAGEMENT SYSTEM (continued)

Risk Controls

PAMIA's Risk Management Framework has been developed to manage risks across the business, using internal control policies, procedures and processes to control risks.

Whereas ultimate control for each risk rests with the Board, day-to-day control is exercised by the Risk Owners unless otherwise stated, as set out in the Business Risk Assessment.

Controls may:

- **Prevent:** controls that reduce the likelihood of the risk occurring. Examples are separation of duties, mandated authorisation or automated processes.
- **Detect:** controls that monitor or identify the risk. Examples are reports or reviews/audits or analyses.
- **Mitigate:** controls that reduce the impact of the risk. Examples are contingency plans and all the contents of the Electronic Quality Management System (EQMS).

Controls may be *proactive* or *reactive*. Those that are proactive should reflect the business plan objectives and seek not only to reduce the negative impact of risk but also increase the positive potential in risk opportunity.

The nature of the controls implemented and the level of control exercised are based on the assessment of likelihood of the risk occurring and its impact; PAMIA's risk appetite; and the cost of implementing controls relative to the significance of the risk.

The Risk Management Framework encompasses a number of elements that together facilitate an effective and efficient operation, enabling PAMIA to respond to a variety of risks. These elements include:

- **Business planning and budgeting**
The annual business planning and budgeting process is used to set objectives, agree action plans, and allocate resources. Progress towards meeting business plan objectives is monitored regularly.
- **Risk based decision making**
PAMIA embeds risk management thinking into all major decisions. Financial and non-financial risks are identified as well as ways of managing them down to levels within PAMIA's risk appetite.
- **Policies and procedures**
A series of policies underpin the internal control process in relation to risks. The Internal Control Framework document sets out PAMIA's underlying approach to internal control. PAMIA's Board sets the policies. EQMS procedures support the policies where appropriate.
- **Early warning mechanisms**
Early warning mechanisms are risk indicators that alert Risk Owners before a risk crystallises so that proactive action can be taken to manage the potential hazard.

B.3. RISK MANAGEMENT SYSTEM (continued)

- **Key risk indicators:** Where possible, key risk indicators are generated. Key risk indicators, together with key performance indicators, provide information/reports/financial indicators that are reviewed by the Risk Owners to monitor the risk, give advance warning of a possible increased risk, and form part of the management reporting structure.
- **External data:** Risk Owners review external sources of information, including from or concerning PAMIA's client marketplace, competitor information, insurance market and rating agencies.

Together these factors are also taken into account in the process of identifying and assessing new and emerging risks.

- **Contingency plans**

The need for contingency plans is considered as part of the assessment of emerging risks and subsequently reviewed as part of the annual risk management review process.

- **Internal audit programme**

The internal audit plan is developed around PAMIA's objectives on an annual basis, using PAMIA's assessment of risks as recorded in the Business Risk Assessment. The planning for the internal audit programme takes into account the assessment by the Risk Officer of the design and operational effectiveness of the risk management process including controls. The work programme considers those controls in place to deal with operational and regulatory risks.

- **Statutory audit**

Statutory (external) audit provides an opinion on whether the financial statements give a true and fair view of the state of PAMIA's affairs at the year-end and of its surplus or deficit for the year just ended. External audit will also inform the Audit & Risk Committee of the operation of the internal financial controls reviewed as part of the annual audit and on the effectiveness of the internal audit.

- **Third party reports**

From time to time, the use of external consultants may be appropriate in areas such as health and safety or human resources. The use of specialist third parties for consulting and reporting can increase the reliability of the internal control system.

- **Risk-based reporting**

Risk-based reporting has been established throughout the business to maintain an aggregated view of the risk profile of the business, including identifying emerging risks and loss/near miss events. This ensures that business planning, decision making and operational processes are informed and responsive to change.

Material changes to existing risks, emerging or internal control failings or weaknesses which require immediate action are the subject of interim reporting and consideration at the appropriate forum, with remedial action implemented with immediate effect.

B.3. RISK MANAGEMENT SYSTEM (continued)

Risk Reporting Procedures

Risk Owners hold management meetings every quarter. The management meetings present a formal opportunity to discuss risks and the effectiveness of controls, but discussions are held as required outside those meetings. Any amendments to the Business Risk Assessment proposed by Risk Owners are presented to PAMIA's Audit & Risk Committee at the first meeting following any amendment.

Risk Owners also identify Risk Events which are reviewed by the Managers Management Committee and then recorded on PAMIA's Risk Event Database with remedial actions identified for which a completion date is set. The financial consequences of loss events (including regulatory breaches) are also identified and also whether the circumstances surrounding those events might give rise to a claim on the Managers' E&O policy.

The professional indemnity insurance for the Thomas Miller group of companies is purchased from Windsor Insurance Company Ltd, a wholly-owned subsidiary of Thomas Miller Holdings. The limit of indemnity is £45m with a deductible of £10,000. Claims are dealt with in the Thomas Miller office in the Isle of Man.

The ORSA overview reports are provided to the Board annually or more frequently, as appropriate, giving information on PAMIA's recent performance and its risk profile whilst also providing consideration of business planning and scenario testing.

The various aspects of the Risk Management System have been described above. The Risk Management Function is fulfilled by PAMIA's Risk Officer who oversees risk management; provides independent challenge; and has direct access to the Chairman of the Audit & Risk Committee. The Risk Management Function maintains an organisation-wide and aggregated view of the risk profile of PAMIA, including monitoring risk tolerances against appetite, and advising on how risks might impact the business singly and in combination. Much of this work is done through stress testing and scenario analysis for the ORSA process in collaboration with the Actuarial Function. Responsibilities of the Risk Management Function are contained in PAMIA's Risk Management Framework.

The integration of risk management processes with business activities is performed through the requirement for business function heads who are also risk owners on the Business Risk Assessment to focus on risk management on an ongoing basis whilst ensuring that the risks for which they are responsible remain within risk tolerance. This demonstrates the proactive application of risk management techniques to support the business processes and decision-making for which they are also responsible in their day-to-day insurance business activities.

In addition, there is a strong foundation of risk information available as described earlier in this section relating to, for example, the Business Risk Assessment, the risk matrix, the risk appetite statements and preferences and tolerances.

B.4. INTERNAL CONTROL SYSTEM

Internal control is defined as a continually operating process effected by PAMIA's Board, the Managers, all staff and systems and designed to support PAMIA in achieving its business plan objectives through efficient and effective operations and to protect its resources.

Each Risk Owner, as named in the Business Risk Assessment, is responsible for the application of the Internal Control Framework and the design, development, implementation, documentation and maintenance of effective internal control processes in their area and reporting thereon.

Control activities

Control activities are the actions taken or systems put in place to address business risks, protect assets and ensure that all material control failures and issues are identified and managed. The control activities are embedded into plans, policies, procedures, systems and business processes. Their effectiveness relies on the level of compliance by management and staff.

The nature of the controls implemented and the level of control exercised are based on the assessment of frequency and impact of the risk, PAMIA's risk appetite and the cost of implementing controls relative to the significance of the risk.

The following controls enforce the above:

- Policies and procedures
- Management information
- System embedded controls
- Premises and System security
- Segregation of duties
- Information processing
- Recruitment, performance management and training
- Contingency plans

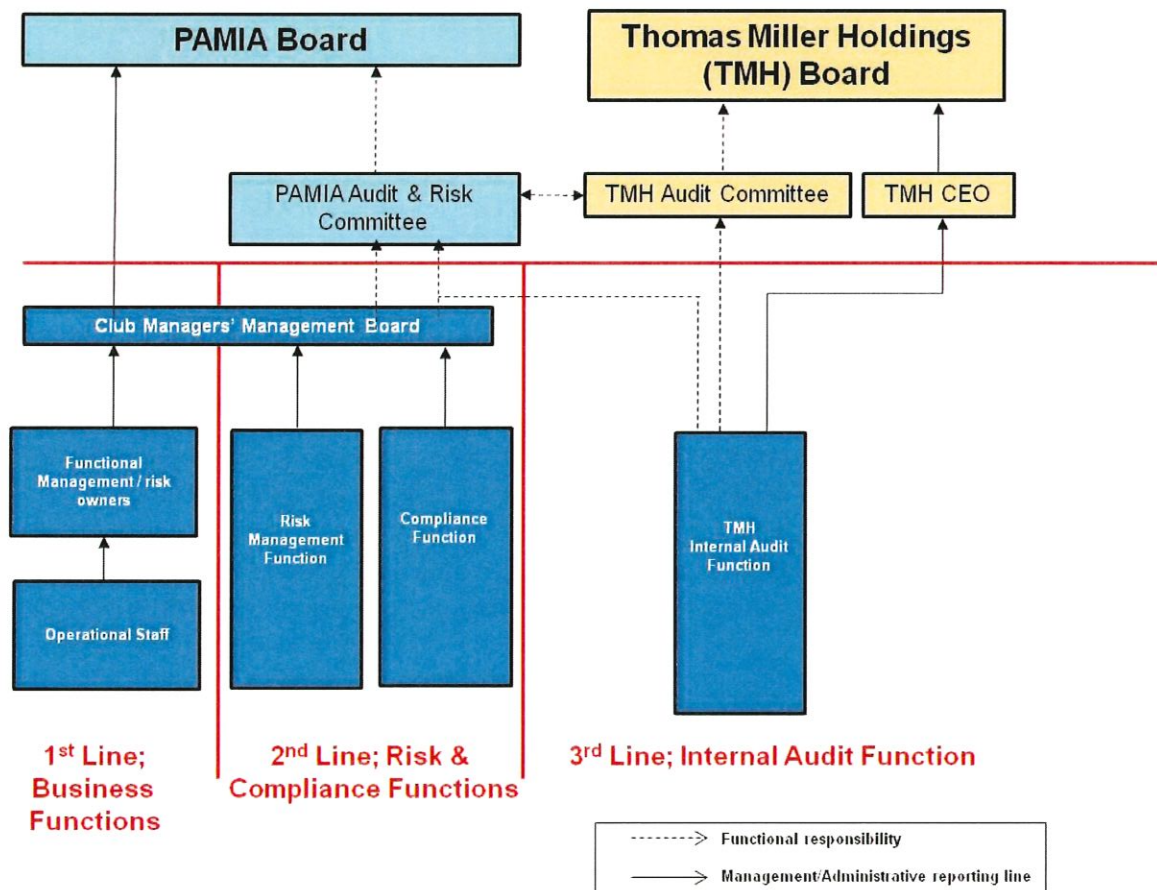
The Internal Control Framework as a whole and internal control processes individually are monitored on an ongoing basis through the following mechanisms:

- Performance indicators
- External data
- Analyses and reconciliations
- Regulatory compliance monitoring audits
- Internal audits
- Procedure monitoring audits

B.5. INTERNAL AUDIT FUNCTION

Internal Audit is the “third line of defence” in the Company’s internal control framework, established to provide independent assurance that the systems of internal control established by management (“first line”) and the monitoring and oversight provided by the Risk Management and Compliance Functions (“second line”) are fit for purpose and operating effectively.

This is illustrated by the diagram below:



The objectives of the Internal Audit Function are to provide independent assurance that business risks are identified and are being well managed and controlled by effective systems of internal control.

The Internal Audit function of the Company is provided by the Managers who employ an independent Head of Internal Audit (HIA) who reports functionally to the PAMIA Audit Committee, via its Chairman and administratively to the TMH Chief Executive Officer. The HIA may engage third parties to conduct some Audits under his/her management if it is felt that specific technical skills are required or where insufficient general audit resource is available.

B.5. INTERNAL AUDIT FUNCTION (continued)

Independence

The Internal Audit Function is independent from the organisational activities audited and free to exercise its assignments without impairment and on its own initiative in all areas. It is not prohibited from carrying out any operational work on behalf of any area of any business.

Development of plans

Audit Plans are developed by the Internal Audit Function on a rolling three year basis, subject to annual review and approval by the Audit and Risk Committee and ongoing monitoring by the HIA who will advise the Committee when the revisions to the plan may be required. The plan is designed to provide for all significant areas of risk facing the business to be audited during each three year period.

Planning

The Internal Audit Function will prepare an Audit Planning Memorandum ("APM") for each audit, which describes the scope of the Audit and the key risks to be addressed. There will be a formal opening meeting at which the appointed audit team will meet relevant line management to discuss the planned audit and agree the scope of work.

The finalised APM will be sent to relevant line management and copied to appropriate business executives who have an interest in the outcome of the Audit.

Execution

The audit team is responsible for conducting the fieldwork including performing whatever control evaluation, substantive and compliance testing is deemed necessary. The Internal Auditor leading the assignment will discuss any findings as they arise with appropriate management to ensure that any misunderstandings or queries are dealt with as soon as possible.

An 'end of fieldwork' meeting will be held to confirm the factual accuracy of any control weaknesses identified during the course of the fieldwork and the recommended remedial action will be discussed at this meeting.

Reporting

A comprehensive Internal Audit report will be produced following completion of every Audit engagement. This report will include a description of any control deficiencies identified as well as the actions that have been agreed to be implemented to remedy these.

The report will include the names of the individuals responsible for remedial action and the date by which such actions will be completed.

All Internal Audit reports will normally be given an overall control rating which will be based on the severity of any individual control deficiencies identified.

The method of determining overall control rating for Audit reports and for individual control weaknesses is described in the 'TMIA Framework' which is the methodology used by the Internal Audit function.

B.6. ACTUARIAL FUNCTION

The Company's Board is ultimately responsible for ensuring an effective Actuarial Function. This function is performed by the Thomas Miller Actuarial Team, led by its Chief Actuary.

The Actuarial Function is independent of the Company's management team and is therefore able to undertake its duties in an objective, fair and independent manner. However, for operational purposes, the Actuarial Function is integrated into the Company's internal control system through its interactions with the management team and attendance at meetings of the Board and Board committees.

The Actuarial Function undertakes all responsibilities as required by Solvency II, including:

- coordinating and overseeing the calculation of Solvency II technical provisions;
- ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of technical provisions;
- informing the Board of the reliability and adequacy of the calculation of technical provisions;
- expressing an opinion on the overall underwriting policy;
- expressing an opinion on the adequacy of reinsurance arrangements; and
- contributing to the effective implementation of the risk management system including capital requirements and the ORSA process.

B.7. OUTSOURCING

PAMIA has in place an outsourcing policy which is directed at services or activities which are particularly important or critical to PAMIA's business (material business activities).

Material business activities include the Key functions of PAMIA's system of governance i.e. Risk Management, Compliance, Actuarial and Internal Audit, and all functions or activities that are fundamental to enable it to carry out its core business including underwriting, claims handling and investments.

A material business activity is one that has the potential, if disrupted, to have a significant impact on PAMIA's business operations or its ability to manage risks effectively.

Management outsourcing

PAMIA has no internal executive function and its management is wholly, outsourced under a management agreement to Thomas Miller Professional Indemnity Limited (the 'Managers'), which is a wholly owned subsidiary of Thomas Miller.

In order to comply with its regulatory obligations, the Board has developed monitoring and reporting procedures. The risk control and reporting procedures to be followed by the Managers form part of their obligations under the management agreement.

B.7. OUTSOURCING (continued)

Investment management outsourcing

Management of PAMIA's investments is outsourced to Thomas Miller Investment Limited, which is part of the Thomas Miller group of companies, under an Investment Management Agreement.

The performance of the investment managers is reviewed by the Investment Committee at each of its meetings and the Board receives a report from the Investment Committee at every Board meeting.

Internal audit outsourcing

PAMIA's internal audit function is outsourced to Thomas Miller & Co. Limited, which is part of the Thomas Miller group of companies, under a written services agreement. The Internal Auditor has a direct reporting line into the Audit & Risk Committee.

Insurance Consultancy

Insurance Consultancy has been outsourced to Willis Towers Watson. There is a written agreement between PAMIA and Willis Towers Watson setting out Willis Towers Watson's responsibilities.

Oversight

The Board bears ultimate responsibility for outsourced material business activities. The Board is supported by the Audit & Risk Committee, the Managers, the Risk Officer, the Compliance Director, the Internal Auditor and the Investment Manager which monitors the activities of PAMIA, including outsourcing.

B.8. ANY OTHER INFORMATION

The Company considers that there is no other material information to be disclosed.

C. RISK PROFILE

The key areas of risk affecting the Company can be classified as follows:

- Underwriting Risk
- Market Risk
- Credit Risk
- Liquidity Risk
- Operational Risk

The Company has set out a number of risk appetite statements, which guide the implementation of its business plan.

The following sections consider each of the Company's risk categories. The key risks are Underwriting Risk and Market Risk.

C.1. UNDERWRITING RISK

The Company's main objective is to remain the leading provider of professional indemnity insurance to patent and trade mark attorneys in private practice in the UK and Ireland. The Company covers individuals, limited liability partnerships and limited companies. The Company seeks to maintain a reputation for claims handling expertise, financial strength and excellent policy coverage.

Underwriting Risk is the risk that the Company's net insurance obligations (i.e. claims less premiums) are different to expectations. The Company considers the risk of existing obligations (Reserve Risk) separately to the risk of future obligations (Premium Risk). The Company uses reinsurance to manage its Underwriting Risk. However, the Company is exposed to the risk that the reinsurers do not pay the claims. This risk is covered under Credit Risk.

Reserve Risk is managed by the Company's Reserving Policy. Given the size and nature of the Company's business, there is not considered to be sufficient volumes of data to apply traditional actuarial and statistical methods to project future claims outcomes. As such, the claims reserves are determined based on an analysis of individual claims, incorporating knowledge of the business and claims environment.

Premium Risk is managed by the Company's Underwriting Policy, which establishes underwriting practices in order to meet business needs and satisfy regulatory control. This is supplemented with business planning and forecasting exercises undertaken as part of the Company's ORSA process.

Risk Mitigation

Underwriting Risk is mitigated by the Company's reinsurance programme. The Company currently has reinsurance cover relating to claims and settlement costs of £4,600,000 in excess of £400,000. This cover has free and unlimited reinstatements. The Company also has a whole account stop loss which limits the total net cost in respect of the 2018 policy year to £2,150,000.

PAMIA LIMITED

C. RISK PROFILE (continued)

C.2. MARKET RISK

Market Risk arises through fluctuations in equity values, interest rates, corporate bond spreads and foreign currency exchange rates. Such movements will affect not only the Company's investments, but also the value of other assets and liabilities such as claims payments and reinsurance recoveries.

The Company has an Investment Policy in place to manage exposure to its investments, and this is monitored by regular reports from the Investment Managers. Further discussion of this arrangement is provided below under the "prudent person principle".

The following table details the Company's exposure to currency risk and equity risk by each underlying currency as reported in the Company's annual financial statements:

As at 30 June 2019	Sterling	US Dollar	Euro	Total
	£'000	£'000	£'000	£'000
Fixed interest -Governments	5,877	2,329	906	9,112
Equity & Alternatives	9,350	613	-	9,963
UCITS	2,240	117	-	2,357
Reinsurers share of claims outstanding	6,457			6,457
Cash at bank	2,430	-	-	2,430
Debtors arising from direct insurance	12	-	-	12
	26,366	3,059	906	30,331

The foreign currency risk sensitivity as at 30 June 2019 if the UK Sterling weakened/strengthened by 5% against the US dollar and Euro with all factors remaining unchanged, free reserves at year end would increase/decrease by £0.198m.

The Company's Market Risk is dominated by Equity Risk. This is due to the Company investing a large percentage of its assets in equities and alternative investments.

The Company's Investment Mandate also allows investment in government and corporate bonds, exposing it to interest rate and spread movements. However, this risk is significantly smaller than that presented by the Company's equity exposure.

C. RISK PROFILE (continued)

C.2. MARKET RISK (continued)

The prudent person principle

Under the Company's Investment Policy, all of the Company's investments are invested and managed in accordance with the 'prudent person principle', meaning that duties of the Investment Managers are discharged with the care, skill, prudence and diligence that a prudent person acting in a like capacity would use in the conduct of an enterprise of like character and aims. More specifically:

- invested in assets and instruments whose risk can properly be identified, measured, monitored, managed, controlled and reported;
- to ensure the security, quality and liquidity of the portfolio as a whole;
- appropriate to the nature, currency and duration of the Company's insurance liabilities;
- derivative instruments are possible if they contribute to a reduction of risks or efficient portfolio management;
- unlisted investments and assets are kept to prudent levels; and
- properly diversified to avoid excessive reliance on any asset, issuer or group, or geographical area.

The Company's funds are invested by the Investment Managers in accordance with parameters set by an Investment Mandate. The Investment Mandate provides a framework to the Investment Managers for the management and stewardship of the Company's investment assets in conformity with the business and investment objectives and sets the parameters within which the Company's assets may be invested. It is considered and approved by the Board on a triannual basis and ad hoc as required and is subject to the Company's Investment Policy.

The Company's Investment Strategy also allows investment in government and corporate bonds, exposing it to interest rate and spread movements. However, this risk is significantly smaller than that presented by the Company's equity exposure.

C.3. CREDIT RISK

The Company is exposed to price risk through its holding of equities and alternatives as financial investments at fair value through profit and loss. At the year end the holding in equity and alternative instruments amounted to 46 % of the investment portfolio (2018: 41%).

A 1% increase in equity values would be estimated to have increased the surplus before tax at the year-end by £0.1m. A 1% fall in equity values would have an equal and opposite effect. This analysis assumes that all other variables remain constant.

An increase of 100 basis points in interest rates at the year-end date, with all other factors unchanged will result in a £0.09m fall in the value of the Company's investments. A decrease of 100 basis points would have an equal and opposite effect.

PAMIA LIMITED

C. RISK PROFILE (continued)

C.3. CREDIT RISK (continued)

Credit Risk is the risk of loss in the value of financial assets due to counterparties failing to meet all or part of their obligations.

The following table illustrates aggregate credit risk exposure for financial assets as reported in the Company's annual financial statements. The credit rating bands are provided by independent ratings agencies:

As at 30 June 2019	AAA/AA/A £'000	BBB or less or not rated £'000	Total £'000
Fixed interest-Government	9,112	-	9,112
Equities & Alternatives	-	9,963	9,963
UCITS	-	2,357	2,357
Reinsurers share of claims outstanding	6,457	-	6,457
Cash at bank	-	2,430	2,430
Debtors arising from direct insurance	-	12	12
	<u>15,569</u>	<u>14,762</u>	<u>30,331</u>

As the Company's claims tend to be small, typically the Company is not exposed to significant reinsurance Counterparty Default Risk. However, if a large claim was to arise, the Company could have a significant reinsurance default exposure. The Company's objective is to reduce Credit Risk through risk management techniques, which are discussed below:

- The reinsurance contract is reviewed annually before renewal.
- Exposure to reinsurance counterparties is mitigated by the Company only placing reinsurances with counterparties which are rated 'A' or better.
- The Company limits any single placement to no more than 25% of the total cover.
- The Company requires reinsurance cover to be placed with a minimum of five reinsurers.
- The Company's exposure to default risk is evaluated as part of the ORSA process.

Exposure to debtors is mainly in respect of calls and premium contributions. This is spread over a number of Members and counterparties, which mitigates the risk.

Exposure to bank balances is more concentrated, with one main counterparty. This risk is mitigated by placing funds surplus to normal operational requirements in money market funds and other investments.

PAMIA LIMITED

C.4. LIQUIDITY RISK

Liquidity Risk is the risk that the Company is unable to make payments as they become due. This is managed by the use of liquid investments and minimum cash holdings required by the Company's Investment Strategy.

The following table provides a maturity analysis of the Company's financial assets representing the date that a contract will mature, amounts are due for payment or the asset could be realised without significant additional cost as reported in the Company's annual financial statements:

As at 30 June 2019	Short term assets £'000	Within 1year £'000	2-5year £'000	Total £'000
Fixed interest-Government	-	760	8,352	9,112
Equities & Alternatives	9,963	-	-	9,963
UCITS	2,357	-	-	2,357
Reinsurers share of claims outstanding	-	6,457	-	6,457
Cash at bank	2,430	-	-	2,430
Debtors arising from direct insurance	-	12	-	12
	14,750	7,289	8,292	30,331

Reliance on expected future profit

As the Company is a mutual insurer, it does not aim to make "profit" from its activities. However, surpluses or deficits may arise in the course of its operations due to actual experience being different to expectations.

Given the holding in liquid assets, the Company does not rely on expected future surpluses to ensure its liquidity.

The Company's Solvency II balance sheet as at 30 June 2019 recognises expected future premium of £32k from Members in its technical provisions in respect of outstanding premium income for the 2019 policy year. Comparing this to the corresponding expected claims outcome, reinsurance costs and associated expenses, this premium is expected to produce a gross surplus of £10k. However, it should be noted that the Solvency II balance sheet does not reflect all future cash flows and the expected surplus (if any) over the year arising from this premium would be lower than this.

C.5. OPERATIONAL RISK

Operational Risk relates to the failure of internal processes, systems or controls due to human or other error.

In order to mitigate such risks the Company has engaged Thomas Miller Limited as Managers to document all key processes and controls. This documentation is embedded into the organisation and available to all staff. Compliance with the procedures and controls is audited on a regular basis through the Internal Audit Function, which is directed and reviewed by the Board.

The Company is also protected against operational losses by the Thomas Miller Managers' E&O cover.

C.6. OTHER MATERIAL RISKS

The Company has not identified any other material risk that it considers necessary for disclosure.

C.7. STRESS AND SCENARIO TESTING-

The Company carries out stress and scenario testing as part of its risk management and ORSA process. This is based upon the Company's business plan and projects the Company's financials over the next 3 years and considers its solvency position relative to its overall risk appetite statement. The Company's latest ORSA report as at March 2019 included consideration of the following scenarios:

- Catastrophe claims scenario
- Investment assets loss
- Loss of a number of large members
- Claims deteriorations

Under each of the scenarios, the Company would still be able to meet its regulatory capital requirements.

C.8. CONCENTRATION OF RISK

The Company writes large limits and therefore is in theory exposed to a concentration of risk from related claims. This risk is partly mitigated by the Company's reinsurance programme which includes unlimited reinstatements at the individual claim level and limits the total net cost to the Company for the policy year.

C.9. ANY OTHER INFORMATION

The Company has not identified any other material information that it considers necessary for disclosure.

PAMIA LIMITED

D. VALUATION FOR SOLVENCY PURPOSES

D.1. ASSETS

Valuation of the Company's assets (excluding technical provisions) as at 30 June 2019 in GBP £'000's:

	Solvency II	UK GAAP
Investments (other than assets held for index –linked and unit-linked contracts)	21,277	21,432
Insurance and intermediaries receivables	63	63
Reinsurance receivables	3	-
Cash and cash equivalents	2,606	2,430
Any other assets not elsewhere shown	-	-
Total	23,949	23,925

The above table presents amounts at Solvency 2 and UK GAAP valuation basis respectively. For classification purposes the Solvency 2 classification of amounts has been used. Refer to appendix S.02.01.02 for a full Solvency II balance sheet amounts.

The Company's assets are valued using the following principles:

Investments

Investments are carried at market value. Market value is calculated using the bid price at the close of business on the balance sheet date. The market value of foreign currency investments is translated at the rate of exchange ruling at the balance sheet date.

Fair values of investments traded in active markets are measured at bid price. Where there is no active market, fair value is measured by reference to other factors such as independent valuation reports.

A financial instrument is regarded as quoted in an active market if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. If the above criteria are not met, the market is regarded as being inactive.

There is no material differences between the valuation used for Solvency purposes and the valuation used in the Company's financial statements.

D. VALUATION FOR SOLVENCY PURPOSES (continued)

D.1. ASSETS (continued)

Insurance and intermediaries' recoverables

These represent balances that are due for existing insurance contracts. Due to the short term nature of these balances, the carrying amount is considered to be a suitable proxy for its fair value.

When these amounts are not yet due, they are included as a future cash flow in the calculation of technical provisions.

These amounts are reviewed annually for impairment.

Under statutory accounting requirements, these balances are presented separately on the face of the balance sheet whether they are due or not yet due.

Cash and cash equivalents

Cash and cash equivalents include cash at bank or in hand, deposits held at call with banks and other short term highly liquid investments. The carrying value of these balances is considered to be a suitable proxy for fair value.

There is no material differences between the valuation used for Solvency purposes and the valuation used in the Company's financial statements

Any other assets not elsewhere shown

These balances comprise sundry, short term receivables which are classified as sundry receivables in the statutory financial statements.

Due to the short term nature of these balances, their carrying amount is considered to be a reasonable approximation for fair value.

There is no material differences between the valuation used for Solvency purposes and the valuation used in the Company's financial statements.

D. VALUATION FOR SOLVENCY PURPOSES (continued)

D.2. TECHNICAL PROVISIONS

Net technical provisions as at 30 June 2019:

	£'000
Gross best estimate	13,755
Reinsurance best estimate	(5,882)
Risk Margin	450
Net technical provisions	<u>8,323</u>

Refer to appendices S.17.01.02 and S.19.01.21 for details on technical provisions.

The Company's technical provisions are valued using the following principles:

Bases, methods and main assumptions

The technical provisions are valued using the methodology prescribed by the Solvency II Directive and associated regulations. They consist of a "best estimate" of future cash flows (claims, premiums and expenses), which are discounted in line with risk-free interest rates to give the "present value" of those cash flows. Finally, a (market value) "risk margin" is added to take the total to a notional market value (i.e. equivalent to the amount that insurance and reinsurance undertakings would be expected to require in order to take over and meet the insurance and reinsurance obligations).

The calculation of the different elements of the technical provisions is discussed below.

Claims

As the Company only offers professional indemnity cover for patent and trade mark attorneys, all claims are analysed together in one risk group. Given the size and nature of the Company's business, there are relatively few claims. Therefore the claims reserves are set based on an analysis of individual claims, incorporating knowledge of the business and claims environment.

Allowance is also made for claims corresponding to the premium provision. These are valued based on the Company's business plan. The key assumptions relate to the expected future claims costs.

The future claims cash flows are the most uncertain element of the technical provisions. The uncertainty involved was discussed in section C.1 on Underwriting Risk.

Premiums

The premium cash flows in the technical provisions cover the premium payable but not yet due on bound but not incepted business (corresponding to the premium provision).

D.2. TECHNICAL PROVISIONS (continued)

Expenses

The technical provisions include expense cash flows incurred in servicing insurance obligations. This includes both direct and overhead expenses, as well as investment management expenses. The provision is calculated directly in respect of the provision for claims outstanding (for expired business) and a corresponding amount is derived in respect of the premium provision (for bound but not incepted business).

Risk margin

The risk margin is calculated based on the requirement to hold capital to meet the Solvency Capital Requirement until all claims liabilities are settled and a prescribed cost-of-capital rate of 6% per annum. This calculation is based on the assumption that a “reference undertaking” takes on the insurance obligations (and associated reinsurance arrangements). The Solvency Capital Requirement in this context is made up of Underwriting Risk, Counterparty Default Risk and Operational Risk only; assets are assumed to be invested in such a way that Market Risk will be zero. The Solvency Capital Requirements in future time periods have been calculated based on the expected run-off of Underwriting Risk and Operational Risk and assuming Counterparty Default Risk runs off in line with the run-off of the best estimate reinsurance recoverables.

Reinsurance recoverables

This relates to the Company’s expected recoverables from its reinsurance arrangements at the valuation date. It is made up of two elements: reinsurance recoveries and reinsurance premiums. These are valued on a consistent basis with the corresponding claims and premiums elements of the technical provisions. In addition, an adjustment is made to take account of expected losses due to default of the reinsurance counterparties.

Uncertainty in the technical provisions

The estimation of the ultimate liability arising from claims made under insurance contracts is the Company’s most critical estimate. There are several sources of uncertainty that need to be considered in the estimate of the liability that the Company will ultimately pay for such claims.

In particular the following represents the main sources of uncertainty that may impact the outcome of the Company’s technical provisions:

- There is a risk that any legal changes in, for example, the handling of claims, may affect the average cost per claim. Similarly regulatory changes could potentially affect the claims reserves.
- New and unexpected claim types could impact the reserving methodology. This is partly allowed for in the Company’s provision for events not in data.
- Claims arising from circumstances at later stages of development compared to what has been seen in previous years.

PAMIA LIMITED

D. VALUATION FOR SOLVENCY PURPOSES (continued)

D.2. TECHNICAL PROVISIONS (continued)

Differences between GAAP and Solvency II technical provisions

A reconciliation of UK GAAP technical provisions to Solvency II technical provisions is provided below:

	Note	Gross £'000	RI £'000	Net £'000
UK GAAP technical provisions		11,791	6,457	5,334
Eliminate unearned premium reserve	1	-	-	-
Adjustment to expense reserve	2	219	-	219
Provision for contracts bound but not incepted	3	1,623	(651)	2,274
Events not in data	4	275	161	114
Reinsurance counterparty default adjustment	5	-	(3)	3
Effects of discounting	6	(153)	(82)	(71)
Technical provisions before risk margin		13,755	5,882	7,873
Risk margin	7	450	-	450
Total Solvency II technical provisions		14,205	5,882	8,323

Notes

1. Eliminate unearned premium reserve

The Solvency II balance sheet contains no concept of premium earning, and as a consequence, any such balances are eliminated upon transition to the Solvency II balance sheet. These balances are replaced by a provision for future cash flows expected on unexpired business as further discussed in 4 below.

2. Adjustment to expense reserve

Unlike UK GAAP, Solvency II recognises all expense cash flows incurred in serving insurance obligations. This includes both direct and overhead expenses, as well as investment management expenses. As such, an adjustment is made.

D. VALUATION FOR SOLVENCY PURPOSES (continued)

D.2. TECHNICAL PROVISIONS (continued)

3. Provision for contracts bound but not incepted

Solvency II valuation methodology requires contracts to be recognised when the insurer becomes party to the insurance contract. Usually, an undertaking becomes a party to the contract when the contract between undertaking and policyholder is legally formalised.

Nearly all of the Company's policies are coterminous with its financial year. The consequence is that nearly a full year's worth of business is recognised as Bound But Not Incepted ("BBNI") business. A provision on the Solvency II balance sheet, known as the "premium provision", is thus made for future premiums, claims and expenses that relate to BBNI business.

4. Events not in data

Solvency II requires that all possible outcomes be allowed for when setting the technical provisions. Therefore, an additional provision needs to be made for "events not in data", i.e. potential adverse claims outcomes that have not been observed to date and hence are not taken into account in assessing the claims provisions.

5. Reinsurance counterparty default adjustment

For the Solvency II balance sheet, amounts recoverable from reinsurance counterparties must be adjusted for the expected losses due to counterparty default. This adjustment approximates the expected present value of the losses in the event of default, weighted by the probability of default for each counterparty. Under current accounting bases, a provision for bad debts is only made where there is objective evidence that a counterparty may default on its obligation.

6. Effects of discounting

Since Solvency II technical provisions take into account the time value of money, an adjustment is made for the discounting of all future cash flows, based on risk-free interest rates.

7. Risk Margin

The Solvency II risk margin is intended to represent a notional market value adjustment as discussed above.

PAMIA LIMITED

D.3. OTHER LIABILITIES

Valuation of the Company's other liabilities as at 30 June 2019

	Solvency II £'000	UK GAAP £'000
Payables (trade, not insurance)	394	252
Reinsurance payables	7	4
Any other liabilities not shown elsewhere	164	2,680
	<u>565</u>	<u>2,936</u>

Payables (trade, not insurance)

These represent balances payable other than on insurance contracts. Due to the short term nature of these balances, the carrying amount is considered a suitable proxy for fair value.

There are no material differences between the valuation used for Solvency II purposes and the valuation used in the Company's financial statements.

Reinsurance payables

These represent balances that are due to be paid for existing reinsurance contracts. When these amounts are not yet due to be paid, they are included as a future cash flow in the calculation of reinsurance technical provisions.

Under statutory accounting requirements, these balances are presented separately on the face of the balance sheet whether they are due or not yet due.

Any other liabilities not elsewhere shown

These balances include all sundry payables and accruals. Due to the short term nature of these balances, the carrying amount is considered a suitable proxy for fair value.

The main difference between the valuation used for Solvency II purposes and the valuation used in the Company's financial statements is the removal of the provision for contributions received in advance of £2.3 million in UK GAAP.

D.4. ALTERNATIVE METHODS OF VALUATION

The Company does not utilise any alternative methods of valuation.

D.5. ANY OTHER INFORMATION

The Company has not identified any other information that it considers material to be disclosed.

E. Capital Management

E.1 Own funds

	2019
	£'000
SCR ratio	267%
SCR	5,642
Eligible capital	15,040
Excess / (shortfall)	<u>9,398</u>
MCR Ratio	457%
MCR	3,288
Eligible capital	15,040
Excess / (shortfall)	<u>11,752</u>
Tier 1 Basic own funds	<u>15,040</u>

As a mutual insurer with no share capital the Company's capital structure consists of two types of own funds:

1. Accumulated income and expenditure account reserve and reconciliation reserve, which falls under Tier 1 and counts as Basic Own Funds ("BOF"). These funds may be fully utilised to meet both the Solvency Capital Requirement ("SCR") and the Minimum Capital Requirement ("MCR").
2. The Company's Rules allow for Basic and Supplementary contributions from members. The Company's practice is to defer collection of some element of the Basic Contribution called premium deferral. The Company retains its right to call upon the premium so deferred. Once they had been received they would become Tier 1 loss absorbent BOF and therefore count as Tier 2 Ancillary Own Funds for regulatory solvency purposes.

The Company has not applied for to the PRA for approval of the methodology to calculate ancillary own funds ("AOF").

Information, objectives, policies and processes for managing own funds

The Company's objective is to maintain its total capital resources (own funds) in line with its risk appetite statement over the insurance cycle. This would mean that the capital resources exceed the Company's regulatory requirements. The Company forecasts its capital over a 3 year planning horizon.

PAMIA LIMITED

E. Capital Management (continued)

E.1 Own funds (continued)

Material differences between equity as shown in the financial statements and the excess of assets over liabilities

Below represents a reconciliation of UK GAAP reserves to Solvency II equity reserves.

	2018
	£'000
UK GAAP reserves	15,654
Solvency II gross technical provisions adjustment	(2,413)
Accruals and deferred income adjustments	2,374
Solvency II RI technical provisions adjustment	(575)
Total Solvency II basic own funds	15,040

The two most material adjustments to reserves are as a result of the differences in valuation of technical provisions and reallocation of contributions received in advance to Solvency II technical provisions since these represent future cash flows received that relates to BBNI business. Refer to D.1 to D.3 for a discussion of the differences between the bases.

E.2 Solvency Capital Requirement and Minimum Capital Requirement

The table below sets out the capital requirements for the Company for the year ended 30 June 2019 and period ended 30 June 2018 for comparison.

	2019	2018
	£'000	£'000
SCR	5,642	5,273
<u>Made up of</u>		
Underwriting Risk	2,309	2,098
Market Risk	3,996	3,851
Counterparty Default Risk	310	248
Operational Risk	413	341
Diversification effects	(1,386)	(1,263)
MCR	3,288	3,251

The SCR has been calculated using the Solvency II Standard Formula. It is not subject to supervisory assessment, but it is subject to external audit. The Company does not use any simplifications or undertaking specific parameters to calculate the SCR.

The main risks that drive the SCR are Underwriting Risk and Market Risk. Underwriting Risk stems from the insurance risk that the Company assumes through the course of its normal business activities. Market Risk stems from the Company's investment holdings.

The SCR has increased from £5.3m to £5.6m over the year, an increase of £0.3m. This is driven by an increase in premium and reserve risk and equity risk.

E. Capital Management (continued)

The inputs used to calculate the Company's MCR can be found in appendix S.28.01.01.

The inputs used to calculate the Company's MCR can be found in appendix S.28.01.01.

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

This sub-module is not used by the Company.

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

The Company uses the Standard Formula for its Solvency Capital Requirement.

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

The Company has fully complied with the Minimum Capital Requirement and Solvency Capital Requirement during the period under review.

Refer to section E.1 for results of the Minimum Capital Requirement and Solvency Capital Requirement calculations.

E.6 Any other information

The Company considers there to be no other material information that should be disclosed.

PAMIA LTD

Solvency and Financial Condition Report

Disclosures

30 June

2019

(Monetary amounts in GBP thousands)

General information

Undertaking name	PAMIA LTD
Undertaking identification code	213800S1Z441WURQUT86
Type of code of undertaking	LEI
Type of undertaking	Non-life undertakings
Country of authorisation	GB
Language of reporting	en
Reporting reference date	30 June 2019
Currency used for reporting	GBP
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
Assets		
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)	21,276
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>	9,112
R0140	<i>Government Bonds</i>	9,112
R0150	<i>Corporate Bonds</i>	0
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	0
R0180	<i>Collective Investments Undertakings</i>	12,161
R0190	<i>Derivatives</i>	3
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:	5,882
R0280	<i>Non-life and health similar to non-life</i>	5,882
R0290	<i>Non-life excluding health</i>	5,882
R0300	<i>Health similar to non-life</i>	0
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	63
R0370	Reinsurance receivables	3
R0380	Receivables (trade, not insurance)	
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	2,606
R0420	Any other assets, not elsewhere shown	0
R0500	Total assets	29,830

S.02.01.02

Balance sheet

		Solvency II value
		C0010
Liabilities		
R0510	Technical provisions - non-life	14,205
R0520	<i>Technical provisions - non-life (excluding health)</i>	14,205
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	13,754
R0550	<i>Risk margin</i>	450
R0560	<i>Technical provisions - health (similar to non-life)</i>	0
R0570	<i>TP calculated as a whole</i>	0
R0580	<i>Best Estimate</i>	0
R0590	<i>Risk margin</i>	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	<i>Technical provisions - health (similar to life)</i>	0
R0620	<i>TP calculated as a whole</i>	
R0630	<i>Best Estimate</i>	
R0640	<i>Risk margin</i>	
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	0
R0660	<i>TP calculated as a whole</i>	
R0670	<i>Best Estimate</i>	
R0680	<i>Risk margin</i>	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	<i>TP calculated as a whole</i>	
R0710	<i>Best Estimate</i>	
R0720	<i>Risk margin</i>	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	
R0790	Derivatives	21
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	
R0830	Reinsurance payables	7
R0840	Payables (trade, not insurance)	394
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	164
R0900	Total liabilities	14,791
R1000	Excess of assets over liabilities	15,040

Premiums, claims and expenses by line of business

[illegible]

Premiums, claims and expenses by country

	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
	C0080	C0090	C0100	C0110	C0120	C0130	C0140
R0010							
Premiums written							
R0110	Gross - Direct Business						2,283
R0120	Gross - Proportional reinsurance accepted						2,283
R0130	Gross - Non-proportional reinsurance accepted						0
R0140	Reinsurers' share						1,100
R0200	Net		0	0	0	0	1,183
Premiums earned							
R0210	Gross - Direct Business						2,283
R0220	Gross - Proportional reinsurance accepted						2,283
R0230	Gross - Non-proportional reinsurance accepted						0
R0240	Reinsurers' share						1,100
R0300	Net		0	0	0	0	1,183
Claims incurred							
R0310	Gross - Direct Business						2,012
R0320	Gross - Proportional reinsurance accepted						2,012
R0330	Gross - Non-proportional reinsurance accepted						0
R0340	Reinsurers' share						1,582
R0400	Net		0	0	0	0	430
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						1,582
R0500	Net		0	0	0	0	430
Expenses incurred							
R0550							1,365
Other expenses							66
Total expenses							1,430

Non-Life Technical Provisions

[illegible]

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)															
Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	In Current year	C0170	C0180	Sum of years (cumulative)
Development year															
0	1	2	3	4	5	6	7	8	9	10 & +					
Prior	3	71	75	171	449	450	301	0	0	0	0	0	0	0	0
R0160															
R0170	110	3	170	0	0	0	0	12	1	0	0	0	0	1,520	1,520
R0180	40	37	84	282	22	0	0	0	0	0	0	0	1	297	297
R0190	534	141	106	259	45	107	222	0	0	0	0	0	0	465	465
R0200	137	156	393	0	0	0	0	0	0	0	0	222	222	1,415	1,415
R0210	55	7	5	30	0	0	0	0	0	0	0	0	0	686	686
R0220	8	43	156	0	0	0	0	0	0	0	0	0	0	97	97
R0230	21	52	41	0	0	0	0	0	0	0	0	0	0	206	206
R0240	80	7	0	0	0	0	0	0	0	0	0	41	41	114	114
R0250	7	0	0	0	0	0	0	0	0	0	0	7	7	87	87
R0260	0	0	0	0	0	0	0	0	0	0	0	0	0	7	7
Total												279	279	4,895	4,895

Gross Undiscounted Best Estimate Claims Provisions														
(absolute amount)														
Year	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360		
	0	1	2	3	4	5	6	7	8	9	10 & +	Year end (discounted data)		
Prior	0	0	0	0	0	0	0	0	0	0	0	0		
R0160	0	0	0	0	0	0	38	44	47			0		
R0170	0	0	0	0	0	0	0	0				47		
R0180	0	0	0	0	0	0	0	0				0		
R0190	0	0	0	0	2,156	5,186	4,924					4,891		
R0200	0	0	0	405	5	0						0		
R0210	0	0	2,221	1,081	1,104							1,092		
R0220	0	1,035	889	578								570		
R0230	1,807	1,497	975									960		
R0240	1,484	2,960										2,910		
R0250	1,696											1,660		
2019												12,132		
												Total		
												12,132		

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

Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/25					
	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
R0010 Ordinary share capital (gross of own shares)	0	0		0	
R0030 Share premium account related to ordinary share capital	0	0			0
R0040 Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050 Subordinated mutual member accounts	0		0		0
R0070 Surplus funds	15,655	15,655			
R0090 Preference shares	0		0	0	0
R0110 Share premium account related to preference shares	0		0	0	0
R0130 Reconciliation reserve	-615	-615			
R0140 Subordinated liabilities	0		0	0	0
R0160 An amount equal to the value of net deferred tax assets	0				0
R0180 Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
R0220 Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	0				
R0230 Deductions for participations in financial and credit institutions					
R0290 Total basic own funds after deductions	15,040	15,040	0	0	0
Ancillary own funds					
R0300 Unpaid and uncalled ordinary share capital callable on demand	0				
R0310 Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0				
R0320 Unpaid and uncalled preference shares callable on demand	0				
R0330 A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340 Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0				
R0350 Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0				
R0360 Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0370 Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0390 Other ancillary own funds	0				
R0400 Total ancillary own funds	0			0	0
Available and eligible own funds					
R0500 Total available own funds to meet the SCR	15,040	15,040	0	0	0
R0510 Total available own funds to meet the MCR	15,040	15,040	0	0	
R0540 Total eligible own funds to meet the SCR	15,040	15,040	0	0	0
R0550 Total eligible own funds to meet the MCR	15,040	15,040	0	0	
R0580 SCR	5,642				
R0600 MCR	3,288				
R0620 Ratio of Eligible own funds to SCR	266.58%				
R0640 Ratio of Eligible own funds to MCR	457.37%				
Reconciliation reserve					
R0700 Excess of assets over liabilities	15,040				
R0710 Own shares (held directly and indirectly)	0				
R0720 Foreseeable dividends, distributions and charges					
R0730 Other basic own fund items	15,655				
R0740 Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0				
R0760 Reconciliation reserve	-615				
Expected profits					
R0770 Expected profits included in future premiums (EPIFP) - Life business					
R0780 Expected profits included in future premiums (EPIFP) - Non- life business	10				
R0790 Total Expected profits included in future premiums (EPIFP)	10				

Solvency Capital Requirement - for undertakings on Standard Formula

	Gross solvency capital requirement	USP	Simplifications
R0010 Market risk	C0110	C0090	C0120
R0020 Counterparty default risk	3,996		
R0030 Life underwriting risk	310		
R0040 Health underwriting risk	0		
R0050 Non-life underwriting risk	0		
R0060 Diversification	2,309		
	-1,386		
R0070 Intangible asset risk	0	USP Key	
		For life underwriting risk: 1 - Increase in the amount of annuity benefits 9 - None	
R0100 Basic Solvency Capital Requirement	5,229		
Calculation of Solvency Capital Requirement			
R0130 Operational risk	C0100		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
R0140 Loss-absorbing capacity of technical provisions	413		
R0150 Loss-absorbing capacity of deferred taxes	0		
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200 Solvency Capital Requirement excluding capital add-on	5,642		
R0210 Capital add-ons already set	0		
R0220 Solvency capital requirement	5,642		
Other information on SCR			
R0400 Capital requirement for duration-based equity risk sub-module	0		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
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		

S.28.01.01

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

Linear formula component for non-life insurance and reinsurance obligations

C0010

R0010 MCR_{HL} Result

966

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

Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
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C0020

C0030

	0	
	0	
	0	
	0	
	0	
	0	
	0	
	7,872	1,183
	0	
	0	
	0	
	0	
	0	
	0	
	0	

Linear formula component for life insurance and reinsurance obligations

C0040

R0200 MCR_L Result

0

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

Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
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C0050

C0060

Overall MCR calculation

C0070

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

	966
	5,642
	2,539
	1,410
	1,410
	3,288
	3,288