SOLVENCY
AND FINANCIAL
CONDITION REPORT (SFCR)
2024

Fortegra Insurance UK Limited

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INTRODUCTION

Fortegra Insurance UK Limited ("the Company") is a company authorised by the Prudential Regulatory Authority and Financial Conduct Authority.

Cautionary statement regarding forward looking statements

This report may include statements with respect to future events, trends, plans, expectations or objectives and other forward-looking statements relating to the Company's future business, financial condition, results of operations, performance, and strategy. Forward-looking statements are not statements of historical fact and may contain the terms "may," "will," "should", "continue", "aims", "estimates", "projects", or words of similar meaning.

Such statements are based on Management's current views and assumptions and, by nature, involve known and unknown risks and uncertainties' therefore undue reliance should not be placed on them. Actual financial condition, results of operations, performance or events may differ materially from those expressed or implied in such forward-looking statements, due to a number of factors, including, but not limited to, general economic and political conditions and competitive situation, future financial market performance and conditions, including fluctuations in exchange and interest rates, frequency and severity of insured loss events, and increases in loss expenses, changes in laws, regulations and standards, the impact of acquisitions and disposals, including related integration issues, and reorganisation measures, and general competitive factors, in each case on a local and/ or global basis.

Many of these factors may be more likely to occur, or more pronounced, because of catastrophic events, or terrorist-related incidents.

EXECUTIVE SUMMARY

Pursuant to the Solvency II Regulations, the following is a summary overview of each of the sections required in the report. Please refer to each of those sections in their entirety, including in each case the materials incorporated by reference therein.

A. Business and performance

The Prudential Regulation Authority and the Financial Conduct Authority has granted Fortegra approval to establish its subsidiary in the United Kingdom, effective November 29, 2024. This milestone enables the Fortegra Group to significantly expand its specialty insurance underwriting services throughout the United Kingdom.

Recognized as a quality market for Managing General Agents (MGAs) and underwriters, Fortegra Group excels through its rigorous program business underwriting, advanced AI and data science applications, and a steadfast commitment to consistent claims management. Fortegra's underwriting approach ensures that the company effectively meets the evolving needs of agent partners and policyholders, cementing its market leadership.

The licensing of Fortegra UK provides an excellent opportunity to enhance the company's presence in the UK and London markets, demonstrating its commitment to expanding in Europe.

During the year, the Company dedicated its efforts to meticulously setting up its operations and navigating the complex landscape of regulatory approvals essential for underwriting activities set to commence in 2025.

As a result of this focused preparation, the Company did not engage in active underwriting until 2024, which led to a Gross Written Premium (GWP) totaling £nil. This strategic approach lays a strong foundation for future growth and success in the competitive UK market.

Reading this report along with the quantitative reporting templates is recommended. The table below shows the standard formula solvency position as at December 31, 2024:

£'000	2024
Eligible own funds	19,727
Solvency capital requirement (SCR)	8,474
Minimum capital requirement (MCR)	3,317
Solvency II Surplus	11,253
Solvency ratio	232.8%

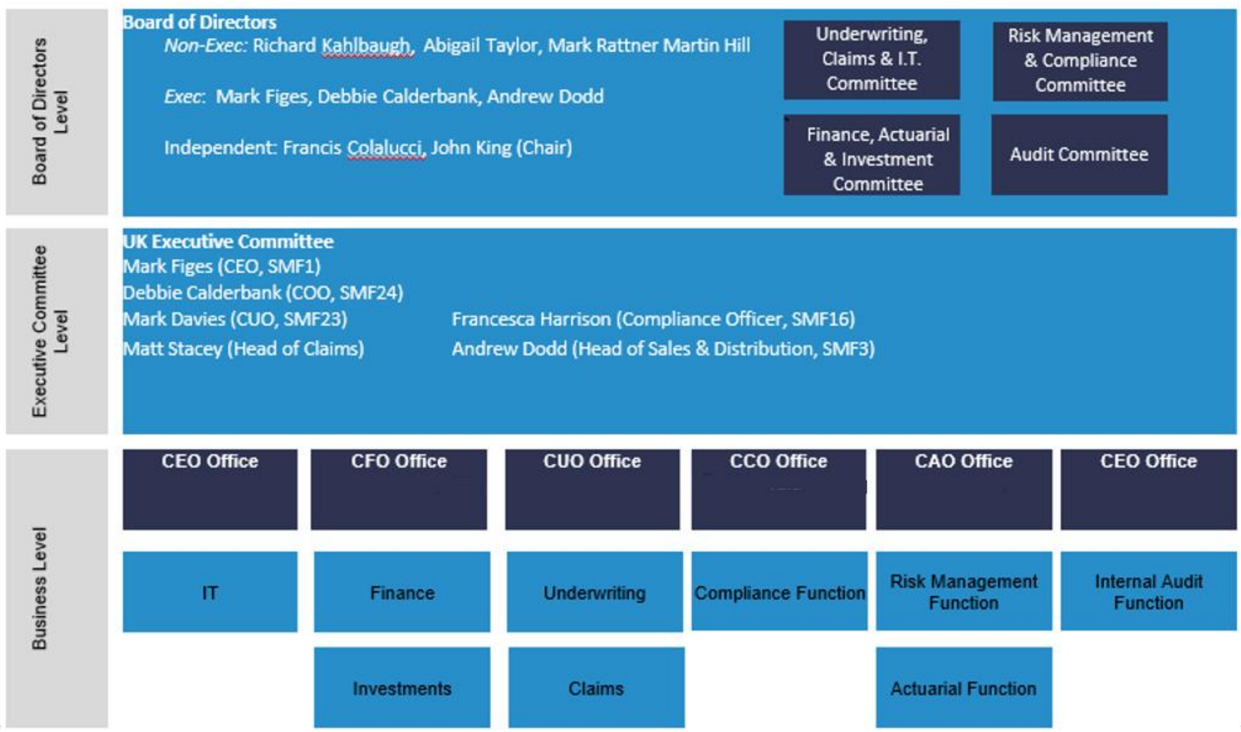
About Fortegra Group

For more than 45 years, Fortegra, via its subsidiaries, has underwritten risk management solutions that help people and businesses succeed in the face of uncertainty. As a multinational specialty insurer whose insurance subsidiaries have an A.M. Best Financial Strength Rating of A- (Excellent).

B. System of governance

The Company has established a strong governance system that ensures sound and prudent management appropriate to its nature, scale, and complexity. This governance structure assures that the Board, its Committees, key function holders, and senior executives are collectively fit and proper, knowledgeable, and experienced in managing insurance business and all related areas for which an insurance undertaking is responsible.

The company operates via a Board of Directors and separate sub-committees:



To effectively address the risks faced by the Company, a comprehensive system of internal controls and risk management governance has been established. This system ensures that executives are kept informed of significant risks in a timely and ongoing manner, and provides them with the necessary information and tools to analyze and manage these risks appropriately.

Such controls include an internal framework with three risk-related lines of defence; the use of the four key functions (Risk Management; Compliance; Internal Audit; and Actuarial) as required by the Solvency II Regulations; and a system of internal risk management governance designed to ensure that the risks to which the Company is exposed are identified, assessed, monitored and controlled in a timely manner.

C. Risk profile

The Board of Directors and the Risk Management Function review the risk profile of the company periodically. The main risk types to which the Company is exposed to are:

- Underwriting Risk
- Market Risk
- Asset Liability Management Risk
- Counterparty Default Risk
- Credit Risk
- Liquidity Risk
- Operational Risk

The nature of such risks and their impact on the Company's risk profile under various scenarios are, in each case, set forth in Section C hereof, including by reference to the documents incorporated therein.

D. Valuation for solvency purposes

The Company's value for solvency assessment is derived from its Generally Accepted Accounting Principles (GAAP) accounts, which are adjusted in accordance with Solvency II regulations.

In the forthcoming years, the most notable differences between the balance sheet reported in the financial statements and the solvency valuation will primarily result from two factors: the revaluation of technical reserves to comply with the Solvency II technical provisions and the removal of deferred acquisition costs. These costs will be replaced by projected future cash flows incorporated into the Solvency II technical provisions.

However, due to the Company not commencing underwriting during 2024, adjustments are limited to including a risk margin as per Solvency 2 Own Funds.

E. Capital management

The Company has two main capital objectives: to maintain sufficient capital to ensure the company can continue its operations and support new business growth and to meet the requirements of its policyholders and regulators. To achieve these objectives, the Company aims to hold capital more than its regulatory capital requirement, known as the SCR, and to maintain a solvency ratio above 150%.

To ensure it meets its future solvency needs, the company analyses its capital requirements for each projected year and continuously assesses whether its eligible capital would comply with Solvency II regulations within the Own Risk and Solvency Assessment ("ORSA").

As at 31st December 2024, the coverage ratio was 232.8%, with eligible own funds of £19,727k and an SCR of £2.2m. The company's MCR was £3,317k.

The Company has continuously complied with both the MCR and the SCR since gaining regulatory approval in November 2024, as confirmed by regulatory reporting.

The company's board regularly reviews the ratio of eligible own funds over the SCR and MCR. It prepares solvency projections over a multi-year period as part of the business planning process.

A. BUSINESS AND PERFORMANCE

A.1 Business

Name of the undertaking:	Fortegra Insurance UK Limited
Company number:	15182608
Date of incorporation:	3 October 2023
Firm reference number:	1007149
Registered office address:	20 Fenchurch Street, 5th Floor, London, England, EC3M 3BY
Regulatory bodies:	Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority

The Company is a subsidiary of Lots Intermediate Co, of 10751 Deerwood Park Blvd, STE. 200, Jacksonville, Florida, United States, registration number 4365570.

Supervisory authorities
On, November 29, 2024, the Company obtained UK regulatory from the Prudential Regulatory Authority to operate in the United Kingdom.

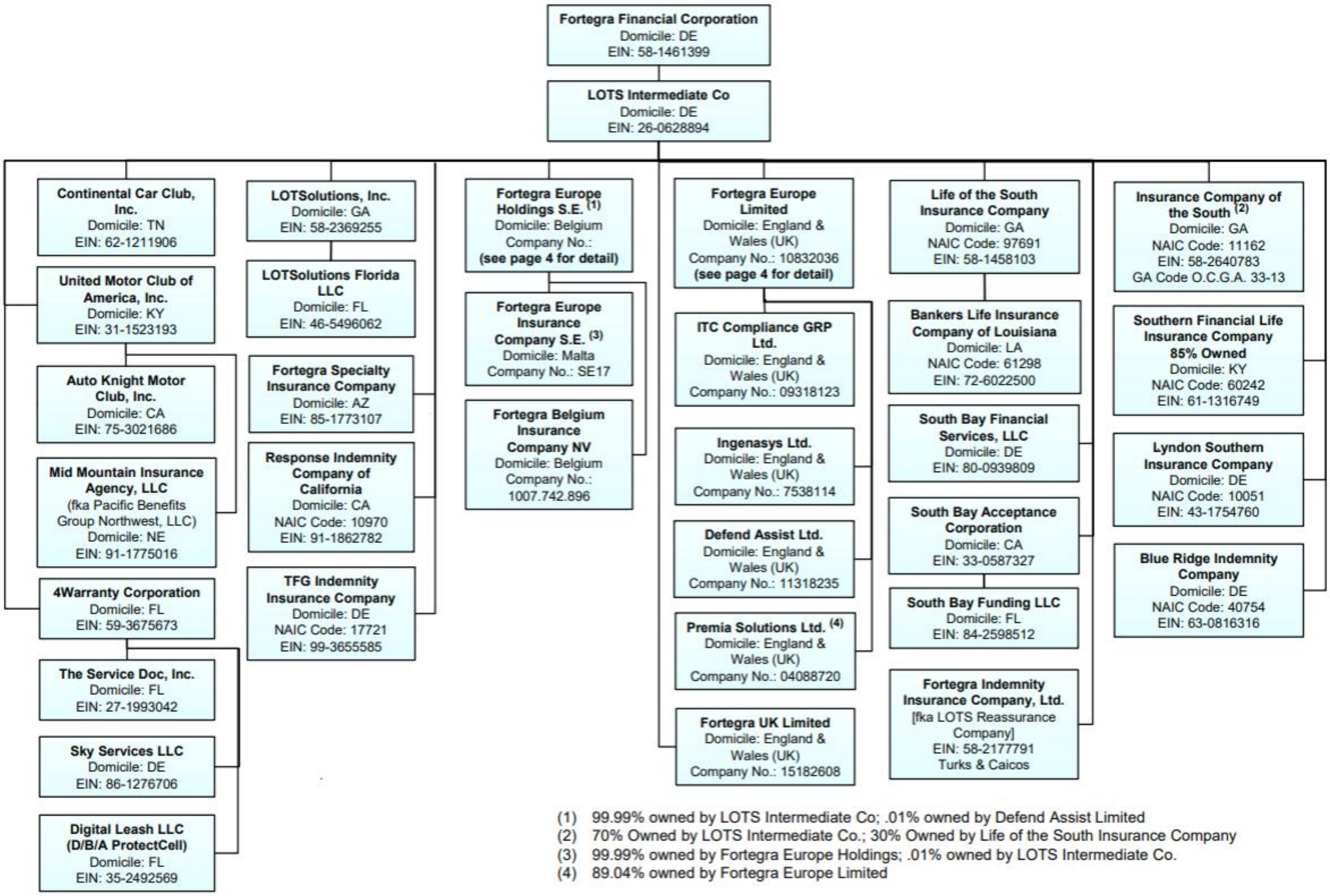
Classes of Business
The Company is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority to carry on the business of insurance in the following classes of general business:

- Accident
- Aircraft liability
- Credit
- Fire and natural forces
- Goods in transit
- Legal expenses
- Miscellaneous financial loss
- Ships
- Suretyship
- Aircraft
- Assistance
- Damage to property
- General liability
- Land Vehicles
- Liability for ships
- Motor vehicle liability
- Sickness

FORTEGRA

Group structure

The following chart presents an overview of the legal structure of the Fortegra Group:



A.2 Underwriting performance

This report covers the financial year 2024, during which the Company was granted a license to operate as an insurance provider. Throughout the year, the Company focused on several key activities, including obtaining regulatory approval and establishing senior management functions.

Since this is the Company's first SFCR, no comparative figures are included.

After obtaining regulatory approval, the company focused on post-approval tasks, such as mobilizing its operational model, onboarding Managing General Agents (MGAs), and appointing underwriting partners.

A.3 Investment performance

The Board has approved an investment strategy that focuses on minimising risks, in line with the Investment Management Policy, the Company only invests in assets whose risks can be properly identified, measured, monitored, controlled, and reported.

Moreover, such assets shall meet the specific risk profile, approved risk tolerance limits and the business strategy of the Company. It is the Company's policy that the funds are invested in a range of instruments and credit institutions to provide for their safety, liquidity, and return.

Income Statement – Non-Technical Account	2024 £'000
Interest & investment income	71

A.4 Performance of other activities

The Company's income is solely generated from the underwriting performance of its policies and the performance of its investments. Similarly, expenses are solely derived from the Company's technical and operational costs.

The Company had no other material income and expenses from other activities in the reporting period.

A.5 Any other information

There is no additional information that has not been included in the preceding sections.

B. SYSTEM OF GOVERNANCE

B.1 General information on the system of governance

The company has a governance structure in place to ensure the proper business management commensurate with its nature, scale, and complexity. This structure ensures that the Board, its Committees, key function holders, and senior executives are fit and proper, knowledgeable, and experienced in managing the insurance business. The governance structure also covers all interconnected areas for which an insurance undertaking should be responsible.

The Board and its committees are responsible for ensuring that governance and risk management policies and procedures are in place and that they are being implemented effectively. They also oversee the performance of key function holders and senior executives. The Risk Management Framework is designed to identify, assess, and manage organisational risks. It is regularly reviewed and updated to remain effective and relevant.

Overview of the Board and its Committees
The Board is responsible and accountable for the Company's performance and strategy while ensuring that the organisation complies with all legal, statutory, regulatory, and administrative requirements.

Moreover, the Board drives and monitors the system of governance to ensure that the Company's established functions, controls and systems are effective and in line with the Company's policies and regulatory requirements. This is achieved through established policies, processes, key function holders, committee meetings and board meetings.

Board of Directors
The Board is responsible for setting out the general direction of the Company, the goal being of achieving sound and prudent management. Sound and prudent management entails an effective risk management function and the implementation of adequate internal control practices in a consistent manner throughout the organisational structure. The Board has established various policies to encompass all controls and processes.

To this effect the Board has the following written policies:

- Business Continuity Policy	- Capital Management Policy
- Complaints Handling Policy	- Compliance Policy
- Conduct Risk Policy	- Corporate Governance Policy
- Data Privacy Policy	- Fit and Proper Policy
- Internal Audit Policy	- Investment Risk Management Policy
- Own Risk and Solvency (ORSA) Policy	- Outsourcing Policy
- Underwriting, Pricing and Provisioning	- Product Oversight and Governance

Risk Policy	Policy
- Disclosure Policy	- Reserving Policy
- Risk Management Policy	- Cloud Policy
- Risk Appetite Policy	- Reporting Policy
- Remuneration Policy	- Reinsurance Policy
- Operational Risk Management Policy	- Liquidity Risk Policy
- Internal Control Policy	- Information Security Policy
- Concentration Risk Policy	- Asset Liability Management and Investment Policy
- Integrity Policy	- Digital Operational Resilience Policy
- Sanctions Policy	- Conflicts of Interest Policy
- Gifts and Hospitality Policy	- SMCR Policy
- Anti-Bribery and Corruption Policy	- Anti-Money Laundering and Terrorist Financing Policy
- Internal Fraud Policy	- Consumer Duty Framework
- Whistleblowing Policy	- Governance and Outcomes Monitoring Policy
- Security Incident Response Plan	- Customer Understanding Policy
- Delegated Authority Oversight Policy	- Customer Support Policy
- Training and Development Policy	- Vulnerable Customer Policy
- Corporate Governance Guidelines and Principles	

All policies are reviewed at least annually or when there are material changes to the business structure or changes in any process or processes to ensure that they are up to date and that they reflect the controls intended to be put and kept in place by the Board.

The Board meets at least four times every year or more frequently if required by the business, or if any circumstance material arises at any point in time.

The Board possesses the required diversity of knowledge, skills, and experience to perform their role effectively and fulfil the Solvency II criteria to collectively possess the appropriate qualification, experience, and knowledge about at least:

- Insurance and financial markets.
- Business strategy and business model.
- System of governance.
- Financial and actuarial analysis.
- Regulatory framework and requirements.

The Company has established a fit and proper policy. The purpose of this policy is to ensure that no individual is appointed to or confirmed in a relevant role unless they have been appropriately assessed by the Company and deemed fit and proper according to regulatory requirements. When evaluating the suitability of relevant individuals for their roles within the Company, the following criteria are considered.

Board of Directors & Committee Responsibilities

The Board appointed various committees to assist it in its governance role. However, it still retains the ultimate responsibility for these delegated functions. Each committee has its own terms of reference and the reporting of each of the established committees is directly to the Board of the Insurance Company.

Management Body	Risk Management Roles and Responsibilities
Board of Directors	Roles and responsibilities include: ▪ Determine and validate the Company's objectives. ▪ Determine and validate the main lines of its organisational structure and its internal control structure. ▪ Determine and validate the Company's policies on governance, such as the fit & proper policy, the remuneration policy, the outsourcing policy, the internal rules on external functions, the IT security and business continuity policy and the charters of the independent control functions. ▪ Determine and validate the reporting intended for the public. ▪ Protect the reputation of the Company. ▪ Ensure the requirements of shareholders are sought and considered as appropriate in decision making. ▪ Have regard to the interests of its stakeholders (including, but not limited to insurance policyholders, customers, suppliers, suppliers, suppliers, suppliers, suppliers, suppliers, regulators, employees, and the community at large). ▪ Exercise leadership, enterprise, and judgement, combined with prudent control in directing the business. ▪ Ensure the Company is managed with integrity, complies with all legal and regulatory requirements, and conducts business in accordance with high ethical standards. ▪ Determine the company's risk appetite and general risk tolerance limits for all key activities (risk appetite policy). ▪ Approve the company's policies. ▪ Be the first line as regards risk-based strategic decisions and be integrally involved in the ongoing supervision of the development of the risk profile. ▪ Approve the Regular Supervisory Report and the Own Risk and Solvency Assessment, with exception of the annual and quarterly Quantitative Reporting Templates for which the Executive Committee is responsible (except for the QRTs annexed to the SFCR). ▪ Evaluate, challenge, and approve the Company's business strategy, business plans, claims plans and accompanying financial information. ▪ Monitor the performance of all business activities against established key performance indicators. ▪ Approve any material changes to business strategy or business plans. ▪ Approve signing / delegated authorities. ▪ Oversight of underwriting (including premium collections) and claims. ▪ Evaluate, challenge, and approve all own risk and solvency assessment (ORSA) exercises.

	▪ Approve the membership and terms of reference of Board committees and address any matters referred to the Board by its Committees. ▪ Provide an oversight of the Company's operations, which includes ensuring there is competent and prudent management, adequate systems of internal control, adequate accounting and other records and compliance with all relevant legal and regulatory obligations. ▪ Monitor complaints (internal and external) and the handling thereof and act where necessary. ▪ Approve the Risk Management Framework that is an integral part of the management of the business and is core to the decision making process. This includes reviewing new risks or changes in significant risks within the business and initiating process/activity to implement new risk management strategies quickly. ▪ Review the performance of outsourced activities performed by critical and important outsourced services providers, including IT services, at least annually. ▪ Notwithstanding the Board's delegation of responsibilities to its Committees, the consideration and approval of any outsource contract above a material amount and any critical or important outsource contract as defined by the Outsourcing Policy or procedures based on this policy. ▪ Assess the results of the annual Board effectiveness. ▪ Approve any proposed change in capital structure and/or capital requirements (Capital Management Policy). ▪ Approve the annual Solvency Capital Ratio. ▪ Challenge and approve all Individual Capital Assessments. ▪ Review and note the Statement of Actuarial Opinion. ▪ Consider the Actuarial Function report. ▪ Monitor cash flow, liquidity, and solvency. ▪ Monitor the gross and net reserves. ▪ Approve the investment policy. ▪ Monitor the performance of the investments, including the proper application of the agreed investment rules by an internal or external investment manager.
Underwriting, Claims and IT Committee	Roles and responsibilities include: ▪ Establish and review on a regular basis the insurance needs of the Company's clients and the adequacy of the policies in place via relationships or otherwise; ▪ Ensure the terms and conditions of the Company's Underwriting Agreements with MGAs are complied with and in turn that the policies, in place for each of the clients, are complied with; ▪ Recommend to the Board of Directors on the differing policies and additional cover that may be available to clients of the Company, whether via MGA relationships or otherwise; ▪ Recommend to the Board of Directors regarding any underwriting aspect that has been referred to the Committee by the Board of Directors;

	▪ Discussion regarding proposals for additional business, product development and potential improvements to products, and making recommendations to the Board of Directors in this regard; ▪ To consider current reinsurance strategies and any necessary amendments to same; ▪ Ensure that the terms and conditions of the reinsurance agreements, if any, are complied with; ▪ Ensure that appropriate due diligence processes are conducted in relation to the quality, size and geographic scope of the claims handling services of MGAs; ▪ Ensure that MGAs only instruct loss adjusters, surveyors, lawyers or any other third parties in accordance with agreed procedures; ▪ Take decisions on claims which are above the underwriting authority provided and take into consideration ex gratia or without prejudice payment of claims; and ▪ Making recommendations to the Board of Directors regarding any claims aspect that has been referred to the Committee by the Board of Directors. ▪ Assess the strategic and operational plans of the Company and I.T. resources necessary to operate effectively and efficiently; ▪ Monitor resources provided by the group IT framework and service providers to verify they are adequate to meet the identified requirements; and ▪ Identify, manage monitor I.T, related risks.
Risk Management and Compliance Committee	Roles and responsibilities include: ▪ Assisting the Board in defining acceptable risk within the Company and proposing a risk appetite statement; ▪ Assisting the Board in embedding Consumer Duty within the culture of the Company and that the delivery of good customer outcomes is at the forefront of all decisions and processes for the Company and its partners. The entire business owns and is responsible for ensuring the outcomes expected under Consumer Duty - products and services, price and value, consumer understanding and consumer support; ▪ Assisting the Board in establishing its risk management policies and ensuring they are implemented effectively, reviewed and updated at least annually and make recommendations for improvements to the risk management framework to the Board; ▪ Overseeing the implementation of the risk management system of the Company, ensuring material risk areas are identified and appropriate controls are in place to mitigate risks in line with the established risk appetite. ▪ Liaising with the director responsible for the risk management system of the Company as appointed by the Board of Directors; ▪ Monitoring, reviewing and proposing the risk register of the Company for Board approval; ▪ Overseeing the Own Risk and Solvency Assessment process and reporting the results of same to the Board of Directors for their approval or amendment as may be necessary.

Finance, Actuarial and Investment Committee	Roles and responsibilities include: ▪ Receive quarterly and annual financial reports from management; ▪ Assess and review the management accounts, financial statements and solvency returns presented by the management and make appropriate recommendations to the Board ; ▪ Monitor the results of the management accounts against financial projections and budgets of the Company and provide recommendations to the Board; ▪ Review the capital requirements and solvency position and make the necessary recommendations to the Board on capital management planning, capital structure and funding; ▪ Review the governance structure in relation to the finance processes and the accounting policies in place on an annual basis and provide recommendations for improvements to the Board; ▪ Oversee the soundness of the Company's reserving, including the Reserving Policy. ▪ Develop and recommend an appropriate investment strategy to the Board which ensures margins of solvency requirements are met and ensures safety, yield and marketability of assets through appropriate spread and diversity; ▪ Issue appropriate investments guidelines to the investment manager, as approved by the Board and monitor adherence thereto; ▪ Review on an on-going basis the appropriateness of the investment strategy in the light of economic and business conditions affecting the Company, and recommend changes for Board approval as may be appropriate; ▪ Review quarterly reports on investment performance; ▪ Monitor performance, including the performance of the investment manager, to ensure that investment returns fall within acceptable limits; ▪ Review the applicable governance process in relation to investment management and policies in place on an annual basis and provide appropriate assurance to the Board; ▪ Review the appropriateness, adequacy and reliability of the methodology and assumptions used in the calculation of technical provisions and solvency capital requirements of the Company; ▪ Review the actuarial function report and assess the actuarial function's opinion on the Company's underwriting policy and reinsurance strategy; ▪ Monitor the role of the actuarial function in the risk management framework and in particular, in the performance of the ORSA.
Audit Committee	Roles and responsibilities include: ▪ Inform the Board of Directors of the outcome of the statutory audit and explaining how the statutory audit contributed to the integrity of financial reporting and what the role of the Committee was in that process; ▪ Monitor the financial reporting process and the submission of recommendations or proposals to ensure its integrity; ▪ Monitor the effectiveness of the Company's internal quality control, its internal audit and the financial reporting of the undertaking, without breaching its independence;

	▪ Provide recommendations to the Board of Directors as respects filing of all required interim and annual financial reports, including audited financial statements and such other statutory reports including Own Risk and Solvency (ORSA), Solvency and Financial Condition Report (SFCR) and Regular Solvency Report (RSR) that require Board approval; ▪ Establish procedures for the receipt and treatment of complaints or concerns coming from employees, contractors or the external auditors regarding accounting, internal controls or auditing matters; ▪ Ensure that significant findings and recommendations made by internal audit are received and discussed on a timely basis and ensuring that management responds to recommendations by internal audit; ▪ Monitor the statutory audit of the annual and consolidated financial statements; ▪ Review any additional reports prepared by the approved auditor submitted to the Committee; ▪ Review and monitoring the independence of the approved auditor in accordance with statutory provisions, and in particular the suitability of the provision of non-audit services to the Company in accordance with same statutory provisions; ▪ Being responsible for the procedure for the selection of the approved auditor and recommending the approved auditor to be appointed in accordance with the statutory provisions.

B.2 Fit and proper requirements

The Company is committed to ensuring all staff have the skills, knowledge, and experience needed for their roles. This is outlined in the company's operating documentation, policies, and procedures.

Assessment of fitness and propriety
During the hiring process, the Company evaluates whether a candidate is fit and proper to undertake the required role. This applies to all staff members, including Committee members, senior management, and other certification functions. To determine the fitness and propriety of a candidate, the Company considers their honesty, integrity, reputation, competence, capability, and financial soundness.

Additionally, staff members should have the necessary qualifications to perform their duties effectively. In significant areas of responsibility, senior management and certification functionaries should have the qualifications required to provide sound and prudent company management. The company has established appropriate policies and processes to assess and ensure ongoing compliance with fitness and propriety requirements.

Technical and professional development
All employees' training needs are assessed regularly thereafter (including if their role changes). Appropriate training and support are provided to satisfy any relevant training needs, and the quality and effectiveness of such training is reviewed regularly.

All employees' competence is reviewed regularly and frequently, and appropriate action is taken to ensure they remain competent. Maintaining competence will consider, where relevant, such matters as technical knowledge and its application.

- Skills and expertise; and
- Changes in the market to products, legislation, and regulation.

B.3 Risk management system including ORSA assessment

Governance structure

The Board is responsible for ensuring the Risk Management System's effectiveness and for determining the Company's Risk profile and tolerance limits. Further to this, the Board is also responsible for approving the Risk Management Strategies and policies within the Risk Management Framework.

The risk management function facilitates the application of the Risk Management System. Its functions include the coordination of the strategies, processes and procedures that are necessary to continually identify, measure, monitor, manage and report all the risks to which the Company is exposed to, or may be exposed to.

Risk management objectives, policies, and processes

The main components of the Board's approach to Risk Management are as follows:

Risk appetite
The Board sets risk appetites for the various risk categories and appropriate measures and controls are selected and agreed for each of the risk categories. This enables regular reporting and assists in monitoring the Company's risks. The risks and controls will be refined as the business grows. Risk appetite is measured in terms of:

- Those activities and associated risk exposures within a given period of time that the Company is prepared to accept, those it will avoid, those to be transferred via insurance/ reinsurance or other contracts and those requiring mitigation through control;

- The ranking of risks within the risk register, i.e. management's view as to whether the risk is adequately controlled or if further work is required to mitigate the risk to improve the resultant risk score;

- Internal Capital Assessment

Internal Capital Assessment
A key component of the Risk Management Framework is the ICA. This assessment is used to calculate the

capital required for each category of the risk. Capital requirements are modelled at the 99.5% confidence level with a 1-year horizon, i.e. to represent a worst-case scenario of a 1 in 200-year event. The capital analysis of the risks contained within the risk register is completed at least annually during the ORSA.

Strategic planning

The strategic planning process is an annual process when the strategy is reviewed and operating plans for future years are formulated. This process considers the risk profile as recorded within the risk register, together with the current risk policies and ICA requirements.

The business objectives are determined, key challenges identified and core assumptions agreed. Scenario analysis is used to help shape strategic options at an early stage, stress tests are applied to challenge key assumptions behind strategic objectives and the plan, and operating plan objectives are analysed in detail to identify and assess associated risks.

Risk Register

Risk register details are retained indefinitely and include details of risk identification and assessment, risk appetite, key controls and remedial actions proposed and implemented. The following records are of particular importance:

- Risk register
- Risk Management Framework Policy, including approval of changes
- Strategic Planning documents
- Compliance exceptional reports
- Internal audit plans and reports
- Board reports and minutes

The Company aims to:

- Identify the risks and identify what could affect the business and processes going forward;
- Communicate risks that crystallise to the members of the Board;
- Ensure that controls are identified for each operational risk.

Monitoring and controlling risk

Key monitoring and control activities are undertaken. The Risk Management function has the following objectives:

- To explain the underlying approach to risk management, whilst giving key aspects of the risk management process, and identifying the main reporting procedures;
- To embed a culture of risk awareness;
- To make all relevant stakeholders accountable for managing risk in line with their roles and responsibilities;
- To identify, prioritise, measure, manage, monitor and treat all critical risks in a consistent and effective manner;
- To report using appropriate and reliable risk management tools (including key risk indicators, risk and control self-assessments) to support risk-based decision making and capital assessment;

- To comply with all relevant legislation, regulatory requirements, guidance and codes of practice;
- To provide senior management and the Board with timely and dependable assurance that the organisation is managing the significant risks to its business; and
- To enable the Board to review, refresh and approve the Risk Management Strategy annually, as well as to follow any significant change to the business' operating model environment.

Capital is generally estimated in line with the budget for the following year, and is reviewed throughout the year according to risk development, to ensure compliance with the established Risk Appetite limits.

Own Risk and Solvency Assessment (ORSA)

The Own Risk and Solvency Assessment (ORSA) is crucial to the risk management system. The Company must evaluate its short- and long-term risks as an insurance company and determine the funds needed to cover them. The ORSA process assesses the company's overall solvency needs, considering its risk profile, risk tolerance, and business plan. It allows the Company to identify, quantify, monitor, manage, and report any risks they may face.

The ORSA considers all key risks facing the business, including those not in the SCR, such as liquidity, reputation, and regulatory risks, as well as those in the SCR. Both internal and external risks are evaluated.

The company performs the full Own Risk and Solvency Assessment (ORSA) process at least once a year. The Risk Management department produces a report based on the Capital Model output and considers the future business plan. Although some structures and analyses supporting the ORSA process are ongoing parts of the risk management framework, management believes an annual review cycle is appropriate, given the nature and scale of the company's risks. If there is a significant change in risk profile, a full ORSA process is conducted, and a report is generated as soon as possible.

These changes may impact the risk environment both internally and externally. Such changes can include significant events that can potentially modify the company's overall risk profile.

Internal Triggers

- any significant changes in our overall business strategy or material deviations from our planned course of action.
- setting up new product lines or discontinuing existing products may impact our business.
- significant investment strategy or asset allocation changes may affect our financial standing.
- any significant changes to our reinsurance program may impact our risk exposure.
- any portfolio transfers that may impact our customers or stakeholders.
- any change in mandate that may affect our business operations.

External Triggers

- any significant legal or regulatory changes affecting our operations.
- changes in credit ratings.
- significant global or market-changing events could affect operations, risks, and solvency profile.

- any significant event in the financial market could result in a major decline in the value of our investment portfolio.

If a fundamental change occurs, we may initiate a complete ORSA process. The Risk Management team will evaluate the impact of the change in the risk profile, advise management whether a full ORSA process is required, and produce a complete set of documentation.

The Board can request the Risk Management team to initiate the full ORSA process, even if the Risk Management team decides it is unnecessary.

- The board reviews the Own Risk and Solvency Assessment (ORSA) report to guide critical business decisions, including:
- Setting the company's strategy and determining its risk appetite.
- Approving the business plan for the company.
- Implementing necessary risk mitigation actions.
- Identifying and assessing potential material risks related to the business strategy or business plan.
- Challenging the results of the standard formula Solvency Capital Requirement (SCR) calculation.
- Evaluating the company's short- and long-term capital position.

The Company prepares a multi-year projection of its SCR position, which is recorded in the ORSA report and shared with the regulator as required.

B.4 Internal control system

The company is equipped with a comprehensive and effective internal control system encompassing all activities, including those carried out by third party service providers, to ensure well-ordered and efficient operations.

Due to its nature, Internal Control involves all people, irrespective of their hierarchical level within the organization, who collectively contribute to providing reasonable assurance on the achievement of the objectives mainly regarding:

- Operations objectives: effectiveness and efficiency of operations, differentiating the insurance operations (mainly underwriting, claims, reinsurance and investment) as support operations and functions (human resources, administration, commercial, legal, IT, etc.);
- Information objectives: trustworthiness of information (financial and non-financial, both internal and external) regarding its reliability, timeliness or transparency, among others;
- Compliance objectives: compliance with applicable laws and regulations.

The Company adopts a Three Lines of Defence Model as part of its control environment and risk management system. The main elements of the Three Lines of Defence Model as it pertains to the Company may be summarised as follows:

- First line: the first level of the control environment is the business operations which perform day- to-day risk management activity.
- Second line: these are the oversight functions of the Company, such as Risk and Compliance, and include financial controls. These functions set direction, define policy, and provide assurance.
- Third line: internal Audit is the third line of defence. Internal Audit offers an independent challenge to the levels of assurance provided by business operations and oversight functions.

There is a regular flow of information across the three lines of defence and from the three lines to the governing Committees. Likewise, executive decisions and directions flow opposite from the governing Committees.

B.5 Internal audit function

The Board has established an Internal Audit function, which serves as the third line of defence for the company. The Internal Audit operates independently of all operational activities.

The primary role of Internal Audit is to assist the Board and Executive Management in safeguarding the organization's assets, reputation, and sustainability. It achieves this by evaluating whether all significant risks are identified and accurately reported by management and the Risk function to the Board and Executive Management. Additionally, it assesses whether these risks are adequately controlled and challenges Executive Management to improve the effectiveness of governance, risk management, and internal controls.

The Audit Committee oversees the Internal Audit function. It is responsible for approving an annual audit activity program, supervising the execution of internal audits, and ensuring that all significant issues reported by Internal Audit are satisfactorily addressed.

The Company utilizes specialised resources from the broader Fortegra Group to conduct Internal Audit activities, supplemented by external specialists when necessary. This approach helps maintain the independence of the function and provides the business with a wider range of skills for conducting audits than what is typically available from internal staff.

B.6 Actuarial function

The Actuarial Function ensures that the Company applies sound actuarial techniques consistently to manage its assumed risks. This enables the Company to understand, monitor, report on, and manage its insurance underwriting risk profile, assess its capital needs and deployment strategies, and fulfil its obligations to shareholders, policyholders, and regulators.

The Company has established a practical actuarial function that is appropriate to the nature, scale, complexity, and profile of its exposed risks. It ensures that the actuary meets the necessary criteria for fitness and propriety in performing the actuarial function.

The Actuarial Function operates independently and is free from undue influence by other parties. It establishes and maintains the necessary procedures, processes, and systems that allow the Company to accurately estimate its policyholder obligations, assess potential insurance and reinsurance exposures, and evaluate its capital requirements in accordance with applicable laws and recognized industry standards.

Additionally, the Actuarial Function is responsible for coordinating the calculation of technical provisions, reviewing the appropriateness of the methods, models, and assumptions used in these calculations, and evaluating the sufficiency and quality of the data utilized to determine the technical provisions.

B.7 Outsourcing

The Outsourcing Policy establishes the general principles, tasks, processes and responsibilities in the event of outsourcing of a critical and/ or important business function. The scope of this Policy is to establish the standards for implementing outsourcing arrangements for any key, critical, important operational function, in full compliance with legislative and regulatory requirements.

Any outsourced key function or critical function must be notified to the regulators.

The Board retains ultimate responsibility for the discharging of any obligations related to the outsourced activity or function and must exercise due care in the selection of the service providers, ensuring that they are fit and proper and that any risk generated by the outsourced activity is managed effectively. The Board also remain fully responsible for any sub out-sourcing by the service provider. Furthermore, the Board must ensure that any sub-outsourcing would be notified prior to becoming effective.

The existing governance structure ensures that sufficient control over the critical functions and/ or activities that have been outsourced, in the terms established in the Solvency II Directive and the enabling local legislation.

B.8 Any other information

None.

C. RISK PROFILE

The company calculates its Solvency Capital Requirement (SCR) using the standard formula. For the main risk categories, the standard formula is considered an appropriate risk measurement tool for determining risk exposure, as it recognises the capital charge corresponding to key risks (such as underwriting, market, counterparty and operational risk).

The exposure to other risks not included in the Standard Formula SCR is not considered significant, as effective measures are in place for the management and mitigation of such risks.

C.1 Underwriting risk

The Company has identified several insurance risks that fall under the responsibility of the Chief Underwriting Officer. These risks include Underwriting Concentration, Reserve Risk, Underwriting Fraud or Error, Lack of Underwriting Expertise, Data Quality Risk, Delay Risk, Unintentional Coverage Risk due to Policy Wording, and Catastrophe Risk.

While some of these risks are standard for any insurance company, others arise from the Company's strategy to focus on insurance business underwritten through MGAs. To manage these risks, the Company has implemented several mitigations and controls, including but not limited to:

- Limitations: line size limits
- Monthly meetings with MGAs and Third-Party Administrators (TPAs) to discuss ongoing matters and address any issues
- Periodic specialized audits of MGAs and TPAs
- Quota Share reinsurance coverage along with Excess of Loss reinsurance to address specific risks and catastrophic events
- Binder control checks
- Investigation of unexpected deviations
- Reserve reviews
- Treaty and Facultative Reinsurance in place

C.2 Market risks

Market Risk

Market risk refers to the possibility of the investment manager underperforming investments under their management, which can negatively affect the Company's capital and liquidity. This may lead to inadequate funds available for the payment of claims. Another risk is fluctuations in the level and volatility of market prices of assets, liabilities, and financial instruments, such as Foreign Exchange (FX) rates or interest rates, which may result in realised losses on the investment portfolio.

The Company has established Service Level Agreements and outsourcing contracts with the investment manager to manage this risk.

These agreements are monitored by the Finance Department and reported to management, the Board, and relevant Board Committees. Additionally, the Board and Management oversee the Investment Manager and investments by receiving regular reports on investment performance.

Internal auditors and external regulators also oversee the investment function by conducting audits and S2 reporting.

Asset Liability Management Risk
Asset Liability Management (ALM) risk occurs when the amount, currency, timing or duration of the Company's assets and liabilities do not match, resulting in a mismatch. To ensure adequate liquidity and solvency, it is essential to match the relevant assets to its liabilities by duration and currency.

The Company faces various investment risks that affect its ability to meet its liabilities. These risks include liquidity, concentration, counterparty credit, and market risks such as interest and exchange rates. To manage these risks, the Company maintains a high-quality liquid portfolio that includes cash for daily operational needs. The liquid position is managed through risk appetite tolerances, including parameters for internal cash management and investments managed externally by investment managers.

All these risks are assessed half-yearly or annually as part of the capital modelling process, including stress and scenario testing. The Company monitor the duration of the matching of assets to liabilities and present it to the relevant Committee annually as part of the Own Risk and Solvency Assessment (ORSA) document.

C.3 Counterparty Default Risk

Credit risk refers to the possibility that counterparties may not be able to pay the total amount due on time. The Company faces credit risk in several areas, including corporate bonds, potential failures of bank counterparties, the reinsurers' share of insurance liabilities, amounts due from reinsurers for claims that have already been paid, and amounts owed by insurance contract holders and intermediaries.

In some cases, counterparties may not have credit ratings, which raises the likelihood of default. However, the risk is mitigated due to the diverse nature of the Company's policyholders and intermediaries.

To manage credit risk, the Company has established a risk appetite that specifies the minimum credit rating required for engaging in business with a counterparty. If a counterparty’s credit rating changes after a debt has been accrued, the Company assesses an appropriate response on a case-by-case basis. In the event of a downgrade, the Company minimizes the outstanding balances and may prohibit further debt accrual with that counterparty.

It's important to note that the existence of reinsurance arrangements does not relieve the Company of its obligations as a primary insurer. If a reinsurer fails to pay a claim, the Company is still responsible for making the payment to the policyholder.

The creditworthiness of reinsurers is regularly evaluated by reviewing their financial strength before finalizing any contracts. Moreover, the reinsurance purchasing strategy is updated based on the reinsurers' recent payment history.

C.4 Liquidity risk

Liquidity risk refers to the possibility that insurance and reinsurance undertakings may be unable to realise investments and other assets to meet their financial obligations as they become due.

Liquidity risk is not factored into the SCR Standard Formula calculation. The exposure to liquidity risk is deemed to be low, given the conservative investment policy, which includes holding investments in cash and cash equivalent assets. Consequently, investment risk is relatively limited.

Management and mitigation techniques

Key controls in place are:

- Cash flow monitoring and reporting
- Claim movements reports
- Claim settlement statements from business partners using in cash flow planning

C.5 Operational risk

Operational risk poses a significant concern for the Company and encompasses multiple dimensions. These risks include challenges related to human resources, internal fraud, reliance on third parties, IT operations, and distribution.

Moreover, risks exist due to dependence on third parties for regulatory reporting and development.

The primary sources of operational risk include internal and external fraud, legal actions, unexpected cost inflation, changes in employment laws, improper market practices, non-compliance with regulations, project overruns or failures, subpar performance or failure of outsourced providers, business disruptions and system failures, loss of key personnel, and pandemics.

The Company maintains risk registers for each major business function to effectively manage these risks. It also employs comprehensive procedure manuals and a structured programme to test its processes and systems.

Furthermore, all key functions are required to contribute to the maintenance of a risk register, which is regularly reviewed and scrutinised by the Risk Function. Significant issues are escalated to the Board and the relevant Committee.

Management and mitigation techniques

Key controls in place are:

- Data back-up and recovery
- Emerging risk process
- Business continuity plan
- Training and development programme
- Conduct risk controls
- Sanction process
- Business change management

C.6 Other material risks

Non-compliance risk

Non-compliance risk refers to the potential for incurring losses due to legal or regulatory penalties, or damage to reputation resulting from failure to comply with laws, regulations, rules, internal and external standards, or administrative requirements applicable to its activities.

This risk is mainly mitigated by the compliance function, which provides guidance on adherence to laws and regulations. It also includes an evaluation of how potential changes in the legal environment may affect the Company's operations, along with the identification and assessment of compliance risks.

Legal risk

Legal risk is defined as the event arising from changes in regulations, laws, or administrative procedures that may adversely affect the Company.

In recent years, the regulatory framework governing the insurance industry has been extended with new regulations at both international and local levels. Furthermore, it should be noted that the Company operates in a complex environment under increasing regulatory pressures, not only within the insurance sector but also across the fields of technology, corporate governance, and criminal corporate responsibility, among others.

This risk is primarily mitigated through the efforts of the compliance function and the support of legal counsel.

Cybersecurity risk

Cyber risks refer to threats associated with security in the use of information and communication technologies, cyberspace, and the transfer, processing, and storage of electronic data. Such cyber risks can compromise:

- The confidentiality, integrity, and availability of both the information managed and the systems that store, process, and/or transmit it;
- The continuity of business operations and the services provided to clients;
- In extreme instances, the physical security of both the facilities and personnel.

The Company depends on the Fortegra Group IT infrastructure and the various IT systems employed by its key service providers. Fortegra Financial Corporation is tasked with ensuring IT compliance with PCI, SOX, and regulatory requirements, while implementing policies and procedures designed to safeguard the Company against IT risks, including unauthorised access to information, data integrity concerns, and emerging cybersecurity threats.

Group risk
The Company has not assumed any additional capital requirements for group risk, due to the simplicity of the Group structure and the risk mitigations in place. The Company considers the operational risk capital requirement to be sufficient to adequately cover group risk. Given the Group's structure and the current state of the business, group risk is deemed immaterial.

Strategic risk
The Company aims to establish an appropriate framework to limit the potential for strategic risk arising from unsuitable business decisions, their implementation, or a lack of consideration for the broader markets in which the Company operates. The Company sets a high-level business strategy, which is translated into a three-year financial business plan, a volume plan by distribution channel, and a detailed one-year budget. Performance against both the budget and volume plan is reviewed quarterly.

C.7 Any other information

None.

D. VALUATION FOR SOLVENCY PURPOSES

In Solvency 2, assets and liabilities are valued using a market-consistent approach. The Company also prepares a complete set of accounting figures according to UK GAAP.

Balance Sheet (£'000)	GAAP / Solvency 2
Investments	20,061
Total Assets	*20,061*
Other creditors	(334)
Total Liabilities	*(334)*
Net Assets / Own Fund	***19,727***

As the Company did not begin underwriting in 2024, there is no difference between the UK GAAP and Solvency II Balance Sheets.

D.1 Assets

The Company’s value for solvency purposes is calculated based on the Company's GAAP accounts, which are adjusted according to Solvency II regulations.

In forthcoming years, the most significant changes between the financial statement balance sheet and the solvency valuation will be due to the revaluation of technical reserves to Solvency II technical provisions and the removal of deferred acquisition costs (replaced by future cash flows in the Solvency II technical provisions).

D.2 Technical provisions

The composition of the Solvency II Technical Provisions ("TPs") following the relocation of the allocated insurance business is summarised below:

Risk margin
The Company's Risk Margin has been calculated using the proportional method, which assumes that the change in the best estimate net liabilities (undiscounted) between time intervals can be applied to the SCR to determine future SCRs.

D.3 Other liabilities

As at the reporting date, the Company had £334k of other liabilities, not shown elsewhere. These amounts represent accruals and other liabilities.

Accruals are recognised in line with generally accepted accounting principles. Hence, the Company accrues when it is probable that the Company will be required to settle an obligation, and a reliable estimate can be made of the obligation amount. Other liabilities are recognised initially at transaction value plus directly attributable costs.

As most liabilities are short-term, the carrying value in the annual accounts is considered to approximate fair value. Any discounting for the time value of money would not have a material effect.

There are no material estimates, assumptions or judgements when reporting the value.

D.4 Alternative methods for valuation

No alternative valuation methods have been used.

D.5 Any other information

There is no other significant information regarding the valuation of assets and liabilities that has not been included in the preceding sections.

E. CAPITAL MANAGEMENT

E.1 Own funds

The Company's objective for capital management is to ensure it has sufficient own funds to meet the Solvency Capital Requirement (SCR) and the Minimum Capital Requirement (MCR), while also maintaining a buffer that supports its growth ambitions as outlined in the business plan.

The Board reviews the ratio of eligible own funds to the SCR and MCR at least quarterly. Additionally, the Company prepares solvency projections for the next three years as part of its business planning process. The Company primarily invests its eligible own funds in high-quality fixed-income securities and cash held in bank accounts.

Currently, the Company has no plans to change its investment policy or to modify how it manages its own fund items. Its capital management principle is to maintain a cover rate of 150% of the Solvency Capital Requirement. The required regulatory capital is calculated quarterly, and both the CFO and CRO ensure regular, timely, and effective monitoring of the capital positions.

Internal Reporting of Capital Positions:
The CFO and CRO provide regular and effective internal reports on capital positions to the Board and senior management.

External Reporting of Capital Positions:
The Company produces the following in accordance with Solvency II requirements:
- Quantitative Reporting Template ("ORT");
- Solvency and Financial Condition Report ("SFCR");
- ORSA Report.

E.2 Solvency Capital Requirement & Minimum Capital Requirement

A breakdown of the SCR and Minimum Capital Requirements ("MCR") and the eligible capital are displayed in the following tables:

£'000	2024
Eligible own funds	19,727
Solvency capital requirement (SCR)	8,474
Minimum capital requirement (MCR)	3,317
Solvency II Surplus	11,253
Solvency ratio	232.8%

The standard formula is used to calculate the SCR; the table below shows the components of the SCR:

£'000	2024
Underwriting risk	8,549
Premium & reserving risk	5,728
Catastrophe risk	4,957
Health risk	89
Diversification credit	(2,225)
Market Risk	50
Counterparty risk	1
Operational risk	-
Diversification credit	(126)
Solvency capital requirement	8,474
Minimum capital requirement	3,317

E.3 Material changes to the SCR & MCR over the reporting period

None

E.4 Any other information

Since obtaining a license in 2024, the Company has continuously complied with the MCR and the SCR throughout the reporting period.

No other information

F. Templates

The following reporting templates are provided as appendices to this document, as required by the regulations:

Template Code	Template name
IR.01.02.01.01	Basic Information - General
IR.02.01.02.01	Balance sheet
IR.23.01.01.01	Own funds
IR.23.01.01.02	Reconciliation reserve

Basic information - general

IR.01.02.01.01 - Basic information - general

		C0010
Rows		
Entity name	R0010	Fortegra UK Limited
Entity identification code and type of code	R0025	LEI/6488Y0J3O2M0PY4G8760
Type of undertaking	R0045	Non-Life undertakings
Country of incorporation	R0052	UNITED KINGDOM
Country of the group supervisor	R0055	Not applicable/All geographical areas
Language of reporting	R0070	English
Reporting submission date	R0080	08-04-2025
Financial year end	R0081	31-12-2024
Reporting reference date	R0090	31-12-2024
Regular/Ad-hoc submission	R0100	Regular reporting
Currency used for reporting	R0110	GBP
Accounting standards	R0120	IFRS
Method of Calculation of the SCR	R0130	Standard formula
Use of undertaking specific parameters	R0140	Don't use undertaking specific parameters
Ring-fenced funds	R0150	Not reporting activity by RFF
Matching adjustment	R0170	No use of matching adjustment
Volatility adjustment	R0180	No use of volatility adjustment
Transitional measure on the risk-free interest rate	R0190	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	R0200	No use of transitional measure on technical provisions
Initial submission or re-submission	R0210	Initial submission
Exemption of reporting ECAI information	R0250	Not exempted

Balance sheet

IR.02.01.01.01 - Balance sheet

		Solvency II value	Statutory accounts value
		C0010	C0020
Rows			
Assets			
Goodwill	R0010		
Deferred acquisition costs	R0020		
Intangible assets	R0030		
Deferred tax assets	R0040		
Pension benefit surplus	R0050		
Property, plant & equipment held for own use	R0060		
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	20,023,515.36	20,023,515.36
Property (other than for own use)	R0080		
Holdings in related undertakings, including participations	R0090		
Equities	R0100		
Equities - listed	R0110		
Equities - unlisted	R0120		
Bonds	R0130	20,023,515.36	20,023,515.36
Government Bonds	R0140	20,023,515.36	20,023,515.36
Corporate Bonds	R0150		
Structured notes	R0160		
Collateralised securities	R0170		
Collective Investments Undertakings	R0180		
Derivatives	R0190		
Deposits other than cash equivalents	R0200		
Other investments	R0210		
Assets held for index-linked and unit-linked contracts	R0220		
Loans and mortgages	R0230		
Loans on policies	R0240		
Loans and mortgages to individuals	R0250		
Other loans and mortgages	R0260		
Reinsurance recoverables from:	R0270		
Non-life and health similar to non-life	R0280		
Life and health similar to life, excluding index-linked and unit-linked	R0315		
Life index-linked and unit-linked	R0340		
Deposits to cedants	R0350		
Insurance and intermediaries receivables	R0360		
Reinsurance receivables	R0370		
Receivables (trade, not insurance)	R0380		
Own shares (held directly)	R0390		
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400		
Cash and cash equivalents	R0410	37,059.40	37,059.40
Any other assets, not elsewhere shown	R0420		
Total assets	R0500	20,060,574.76	20,060,574.76
Liabilities			
Technical provisions - total	R0505		
Technical provisions - non-life	R0510		
Technical provisions - life	R0515		
Best estimate - total	R0542		
Best estimate - non-life	R0544		
Best estimate - life	R0546		
Risk margin - total	R0552		
Risk margin - non-life	R0554		
Risk margin - life	R0556		
Transitional (TMTP) - life	R0565		
Other technical provisions	R0730		
Contingent liabilities	R0740		
Provisions other than technical provisions	R0750		
Pension benefit obligations	R0760		
Deposits from reinsurers	R0770		
Deferred tax liabilities	R0780		
Derivatives	R0790		
Debts owed to credit institutions	R0800		
Financial liabilities other than debts owed to credit institutions	R0810		
Insurance & intermediaries payables	R0820		
Reinsurance payables	R0830		
Payables (trade, not insurance)	R0840		
Subordinated liabilities	R0850		
Subordinated liabilities not in Basic Own Funds	R0860		
Subordinated liabilities in Basic Own Funds	R0870		
Any other liabilities, not elsewhere shown	R0880	333,581.82	333,581.82
Total liabilities	R0900	333,581.82	333,581.82
Excess of assets over liabilities	R1000	19,726,992.94	19,726,992.94

Own funds

IR.23.01.01.01 - IR.23.01.01.01 Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
ROWS						
Basic own funds						
Ordinary share capital (gross of own shares)	R0010	20,000,100.00	20,000,100.00			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	-273,107.06	-273,107.06			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160	0.00				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0.00	0.00			
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Total basic own funds	R0290	19,726,992.94	19,726,992.94			0.00
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees	R0340					
Letters of credit and guarantees other	R0350					
Supplementary members calls	R0360					
Supplementary members calls - other	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	19,726,992.94	19,726,992.94			0.00
Total available own funds to meet the MCR	R0510	19,726,992.94	19,726,992.94			
Total eligible own funds to meet the SCR	R0540	19,726,992.94	19,726,992.94			0.00
Total eligible own funds to meet the MCR	R0550	19,726,992.94	19,726,992.94			
SCR	R0580	8,474,452.21				
MCR	R0600	3,316,720.00				
Ratio of Eligible own funds to SCR	R0620	2.3278				
Ratio of Eligible own funds to MCR	R0640	5.9477				

IR.23.01.01.02 - IR.23.01.01.02 Reconciliation reserve

		C0060
ROWS		
Reconciliation reserve		
Excess of assets over liabilities	R0700	19,726,992.94
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Deductions for participations in financial and credit institutions	R0725	
Other basic own fund items	R0730	20,000,100.00
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	-273,107.06