Gresham Insurance Company Limited

Solvency and Financial Condition Report

Year ended 31 December 2023

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Gresham Insurance Company Limited

Solvency and Financial Condition Report

2023

Summary

The purpose of the Solvency and Financial Condition Report (SFCR) is to provide information required by the Solvency II (SII) regulatory framework and in particular the capital position of Gresham Insurance Company Limited (the Company) at 31 December 2023.

The report sets out different aspects of the Company's business and performance, system of governance, risk profile, valuation methods used for solvency purposes and its capital management practices.

Business and Performance

The Company is a limited company registered in England and Wales and member of the Aviva plc group of companies. During January 2023, the Company entered into a contractual agreement with its distribution partner Barclays Bank UK plc that resulted in the Company terminating the current business arrangement on 30 August 2023 and acquiring renewal rights to in-force UK household insurance policies in return for an initial upfront payment to the distribution partner and a smaller deferred consideration payable on the second anniversary based on policy retention performance at the calculation date. This was funded via a capital injection from its immediate parent company, Aviva Insurance Limited (AIL) and included a best estimate assessment of the deferred consideration which will be monitored quarterly. Brand migration of these policies from Barclays to Aviva happened on the acquisition date, with no further new business acquisition into Gresham. The principal activity of the Company going forward will therefore be to administer and manage the in-force UK household insurance policies.

Whilst the Company only conducts non-life insurance activities, it also has life insurance obligations in relation to annuities stemming from non-life insurance contracts (through Periodical Payment Orders 'PPO'**)**.

The Company made an IFRS profit before tax of £6,515 thousand in the year ended 31 December 2023 (*2022: £5,797 thousand*). This comprised underwriting profit of £1,004 thousand *(2022 : profit £3,528 thousand)*, net investment income of £4,140 thousand *(2022: income £36 thousand)* and other income of £1,371 thousand *(2022 : other income of £2,233 thousand)*.

Gross written premium fell by 4% in the year (*2022: fell by 14%*) refecting lower new business sales partially offset by strong retention and renewal rates.. The majority of written premium is ceded to the Company's parent AIL, through a quota share reinsurance arrangement, with levies being excluded from this arrangement.

The Company's net investment income for the year of £4,140 thousand (*2022: income £36 thousand*) comprised interest receivable of £3,491 thousand (*2022: receivable £1,226 thousand*) and unrealised gaines on the Company's holding of financial investments in Government Bonds and Collective Investment Undertakings of £649 thousand (*2022: unrealised loss £1,190 thousand*). The Company received income from other activities of £1,371 thousand *(2022 :income £2,233 thousand)* which primarily arose from changes in the unwind of discounting on incurred claims, economic assumptions for claims provisions and non-insurance income arising from items, such as legal expenses, sold as add-ons to existing policies.

The Board has not declared an interim dividend (*2022: nil*). There have been no other significant business or other events during the year which have had a material effect on the Company.

Section A of this report sets out further details about the Company's key operations and financial performance over the year.

System of Governance

The Board's responsibilities include ensuring that an appropriate System of Governance is in place throughout the Company. To discharge this responsibility, the Board has established frameworks for risk management and internal control using a 'three lines of defence' model. However, the Board sets the Company's risk appetite itself. A strong system of governance throughout the Company aids effective decision-making and supports the achievement of the Company's objectives for the benefit of customers, shareholders and regulators.

The roles and responsibilities of the Board are well defined:

- The Company's Board has delegated responsibilities to management from AIL to assist in its oversight of risk management and the approach to internal controls;
- The Company has implemented four key control functions – Risk Management, Actuarial, Compliance and Internal Audit;
- The Company has in place a remuneration policy, skills requirements and procedures for assessing the fitness and propriety of senior management and key function holders;
- The Company's risk strategy, appetite and framework, its approach to its Own Risk and Solvency Assessment (ORSA), and its governance over the use of the standard formula are set out in its Risk Management Framework policy and its risk policies and business standards; and
- The Company's outsourcing strategy is supported by its Procurement and Outsourcing Business Standard.

As a consequence of the successful purchase of the Home portfolio from Barclays, the Company's Board with effect from 1st January 2023 is solely composed of senior management from Aviva. With effect from 30 August 2023 the Company assumed full responsibility for the Home Portfolio at which point all policies have been rebranded to Aviva (a trade name of the Company). To reflect the changed business and responsibilities the Company and its parent (AIL) have implemented an internal Framework Service Agreement (FSA) to define the management and the day to day operation of the Company, the required governance and oversight, and to formalise the roles and responsibilities.

Section B of this report provides further details of the Company's System of Governance.

Risk Profile

The Company's business is about protecting its customers from risk. As an insurer, the Company accepts the risks inherent to its core business line of non-life insurance.

The Company receives premiums which are invested in order to maximise risk-adjusted returns, so that the Company can fulfil its promises to customers while providing a return to its shareholders. In doing so, the Company has a preference for retaining those risks which it believes it is capable of managing to generate a return.

The types of risk to which the Company is exposed have not changed significantly over the year and remain credit, market, underwriting, liquidity and operational risks.

For those risk types managed through the holding of capital, the Company measures and monitors its risk profile on the basis of the Solvency Capital Requirement (SCR). Some categories of risk are not measured and managed solely by holding capital, principally liquidity risk, which is measured through both absolute level targets and bespoke liquidity coverage ratios.

Section C of this report further describes the risks to which the Company is exposed and how it measures, monitors, manages and mitigates these risks, including any changes in the year to the Company's risk exposures and specific risk mitigation actions taken.

Valuation for Solvency Purposes

Assets, technical provisions and other liabilities are valued in the Company's SII Balance Sheet according to the SII regulations. The basis of the SII valuation principle is the amount for which they could be exchanged, transferred or settled by knowledgeable and willing third parties in an arm's length transaction. The value of Technical Provisions under SII is equal to the sum of a Best Estimate Liability and a Risk Margin.

At 31 December 2023, the Company's excess of assets over liabilities was *£16,257 thousand* (*2022: £16,178 thousand*) on a SII basis.

Section D of this report provides further description of the bases, methods and main assumptions used in the valuation of assets, technical provisions and other liabilities for each material asset or liability class. In addition, it also provides an explanation of the material differences between the IFRS and SII bases of valuation.

Capital Management

The Company manages Own Funds in conjunction with solvency capital requirements. In the calculation of the SCR, the Company has chosen to implement the standard formula (SF). In managing capital, the Company seeks, on a consistent basis, to:

- Match the profile of its assets and liabilities, taking into account the risks inherent in the business;
- Maintain sufficient, but not excessive, financial strength to support new business growth, and satisfy the requirements of the Company's regulators and other stakeholders, giving the Company's customers assurance of its financial strength;
- Retain financial flexibility by maintaining strong liquidity; and
- Allocate capital rigorously to support value adding growth and repatriate excess capital where appropriate.

There have been no material changes to the objectives, policies or processes of the Company for managing its Own Funds during the year.

At 31 December 2023, the total eligible Own Funds to meet the SCR was *£16,257 thousand* (*2022: £16,178 thousand) a*ll of which was represented by unrestricted tier 1 capital. The Company's SCR, at 31 December 2023, was £4,876 thousand (*2022:£4,816 thousand)*. The overall surplus position was *£11,381 thousand* (*2022: £11,362 thousand*) which translates to a regulatory cover ratio of *333% (2022: 336%*).

Section E of this report further describes the objectives, policies and procedures employed by the Company for managing its Own Funds. The section also covers information on structure and quality of Own Funds and calculation of SCR, including information about the Company's use of the SF.

Gresham Insurance Company Limited

Solvency and Financial Condition Report

2023

A. Business and Performance

In this Chapter

A. Business and Performance

The 'Business and Performance' section of the report sets out the Company's business structure, key operations, and financial performance over the reporting period.

A.1 Business

The Company is a limited company, registered in England and Wales , and is a member of the Aviva plc group of companies (the Group).

Qualifying holdings

The Company's shares and the associated voting rights are wholly owned by AIL, being a qualifying holding in the Company.

Supervisor

The Company is authorised by the Prudential Regulatory Authority (PRA). The Company and the Group are regulated by the PRA and the Financial Conduct Authority (FCA) in the UK. The PRA is part of the Bank of England. Contact details for the PRA are as follows:

Address	20 Moorgate, London, EC2R 6DA
Telephone number	+44 (0) 20 7601 4444

External auditor

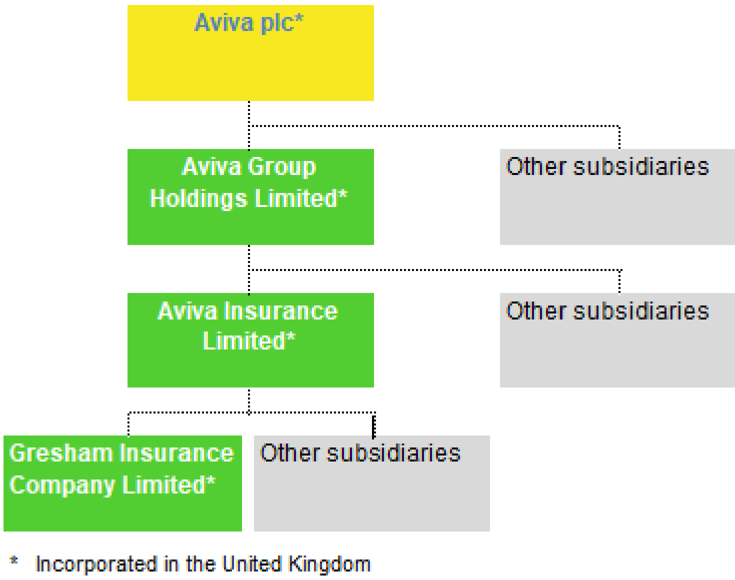
The PRA have issued the Company waiver to exempt the SFCR from the external audit requirements in the PRA handbook. Consequently, all qualitative and quantitative disclosure in this document is unaudited.

Financial statements

The Company's financial statements are available from the Company Secretary, Aviva Company Secretarial Services Limited, 80 Fenchurch Street, London, EC3M 4AE.

A.1.1 Organisation

The following chart shows, in simplified form, the Company's position within the structure of the Group as at 31 December 2023:



Gresham Insurance Company Limited is a subsidiary of Aviva Insurance Limited, which is registered in Scotland. Aviva plc is the ultimate controlling parent entity registered in England.

A.1.2 Business operations and events occurring in the year

Business operations

The only material SII line of business underwritten by the Company is Fire and Other Damage to Property. The Company underwrites its business in the UK, as presented in QRT S.05.01 (Appendix F.1).

The Company underwrites personal household business and has a 100% quota share reinsurance arrangement with its immediate parent company, AIL.

Whilst the Company only conducts non-life insurance activities, it does have life insurance obligations in relation to annuities stemming from non-life insurance contracts (PPO).

Significant business and other events

The Company's financial results are affected by a number of external factors, including demographic trends, general economic and market conditions, government policy and legislation. The following significant events impacted our business during the year:

- During January 2023, the Company entered into a contractual agreement with its distribution partner Barclays Bank UK plc that resulted in the Company terminating the current business arrangement on 30 August 2023 and acquiring renewal rights to in-force UK household insurance policies in return for an initial upfront payment to the distribution partner and a smaller deferred consideration payable on the second anniversary based on policy retention performance at the calculation date. This was funded via a capital injection from AIL and included a best estimate assessment of the deferred consideration which will be monitored quarterly. Brand migration of these policies from Barclays to Aviva happened on the acquisition date, with no further new business acquisition into Gresham. The principal activity of the Company going forward will therefore be to administer and manage the in-force UK household insurance policies.

A.2 Underwriting Performance

A.2.1 Measurement of underwriting performance

The Company uses underwriting profit to measure its underwriting performance. Underwriting result is a non-GAAP financial performance measure, calculated on an IFRS basis. It excludes certain items to enhance comparability and understanding of underwriting performance by highlighting net income attributable to on-going underwriting operations. Examples of items excluded from underwriting result are investment return, economic assumption changes, and non-insurance income. The items excluded from underwriting result, which comprise the Company's investment performance and its performance of other activities, are detailed in sections A.3 and A.4 respectively.

A.2.2 Underwriting performance during the year

The Company made an IFRS profit before tax of £6,515 thousand for the year ended 31 December 2023 (*2022: £5,797 thousand*). This comprises an underwriting profit of £1,004 thousand (*2022: profit £3,528 thousand*), net investment income of £4,140 thousand (*2022: income £36 thousand*) and income from other activities of £1,371 thousand (*2022: income £2,233 thousand*), as shown in the table below.

Year ended 31 December	£000s 2023	£000s 2023	£000s Restated[1] 2022	£000s Restated[1] 2022
Profit for the year before tax		**6,515**		**5,797**
Less: Net investment income (see A.3)		(4,140)		(36)
Add back:				
Unwind of discounting on incurred claims	1,045		279	
Changes in economic assumptions for claims provisions	(246)		(685)	
Other	(2,170)		(1,827)	
Performance of other activities (see A.4)		(1,371)		(2,233)
Underwriting profit		**1,004**		3,528

1. The 2022 comparative results have been restated from those previously published following the adoption of IFRS 17, as described in note 1 of the Company's 2023 financial statements.

Quantification of premiums, claims and expenses, analysed by SII lines of business, is provided in QRT S.05.01 (see Appendix F.1.2.2). This QRT has been prepared in accordance with the definitions and formats prescribed under SII. It includes the items (except net investment income) excluded from underwriting result in the reconciliation presented in section A.2.2 which are described in section A.4.

A summary of the information provided in the premium, claims and expenses QRT S.05.01, analysed by SII lines of business, is provided in the table below.

£000s	Fire and other damage to property insurance	Other SII lines of business	Total
Year ended 31 December 2023			
Gross written premium	95,234	2,945	98,179
Net earned premium	4,000	124	4,124
Gross claims incurred	(66,886)	(2,624)	(69,510)
Net claims incurred	(2,849)	1,872	(977)
Net expenses incurred	(759)	(23)	(782)
Total expenses			(782)
Year ended 31 December 2022			
Gross written premium	98,769	3,055	101,824
Net earned premium	4,147	128	4,275
Gross claims incurred	(55,842)	587	(55,255)
Net claims incurred	1,144	(553)	591
Net expenses incurred	(1,725)	(53)	(1,778)
Total expenses			(1,778)

In the above table the 2022 S.05.01 has not been restated for IFRS17 as there is no regulatory restatement required for SII QRTs, this primarily impacts the presentation of the claims lines.

The Company's gross written premium, which is underwritten in the UK, decreased by 4% (*2022: decreased by 14%*) reflecting lower new business sales partially offset by strong retention and renewal rates. The majority of written premium is ceded to the Company's parent AIL, through a quota share reinsurance arrangement, with levies being excluded from this arrangement.

Net claims incurred were £977 thousand (*2022: positive £591 thousand*) and net expenses incurred were £782 thousand (*2022: £1,778 thousand*), with both reflecting the reinsurance arrangement with AIL.

A.3 Investment Performance

A.3.1 Measurement of investment performance

The Company's net investment income for the year of £4,140 thousand (*2022: income of £36 thousand*) comprised interest receivable of £3,491 thousand (*2020: receivable £1,226 thousand*), reflecting the rise in interest rates over the course of 2022 and into 2023 coupled with realised and unrealised gains on the Company's holding of financial investments in Government Bonds and Collective Investment Undertakings of £649 thousand (*2020: loss £1,190 thousand*). The year on year increase in interest receivable reflects the fact interest rates rose sharply over the course of 2022 and into 2023 increasing the interest earned during the period.

A.4 Performance of Other Activities

A.4.1 Other income and expense

As described in section A.2.1, performance of other activities comprises those items of other income and expense, other than net investment return, excluded from underwriting result. The table in section A.2.2 summarises the income of £1,371 thousand (*2022:* £2,233 thousand) which arose from its performance of other activities during the year. The material components of the Company's other activities are changes in the unwind of discounting on incurred claims, economic assumptions for claims provisions and non-insurance income arising from items, such as legal expenses, sold as add-ons to existing policies.

A.5 Any Other Information

There is no other material information to report regarding the Company's Business and Performance.

Gresham Insurance Company Limited

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B. System of Governance

In this Chapter

B. System of Governance

This section of the report sets out information regarding the 'System of Governance' in place within the Company.

Details of the structure of the undertaking's 'administrative, management or supervisory body' (defined as the Board) are provided. The roles, responsibilities and governance of key functions (defined as the Risk, Compliance, Internal Audit and Actuarial Functions) are also provided. Other components of the System of Governance are also outlined, including the risk management system and internal control system implemented across the business.

B.1 General Information on the System of Governance

B.1.1 Board structure

The Company's Board is responsible for promoting the long-term success of the Company and for setting its strategy. It sets the Company's risk appetites and satisfies itself that financial controls and risk management systems are robust. A strong system of governance throughout the Company aids effective decision-making and supports the achievement of the Company's objectives for the benefit of policyholders and the shareholder.

The duties of the Company's Board are set out in its terms of reference. The terms of reference lists both those items that are specifically reserved for decision by the Board and those matters that must be reported to the Board. The Company's Board is composed solely of senior management from Aviva.

The Company's Board has delegated responsibilities to management from AIL to assist in its oversight of risk management and the approach to internal controls.

The 'three lines of defence model', and roles and responsibilities of key functions

Aviva staff acting on behalf of the Company are involved in the management and mitigation of risk, with the Risk Management Framework (RMF) which codifies the various policies and systems of governance that AIL expects the Company to follow being embedded in the day-to-day management and decision making processes. The three lines of defence model is adopted by the Company and across Aviva Plc (as required by the RMF policy). Further details are below:

The first line (The Business)

Accountable for the management of all risks relevant to the business of the Company. The Chief Executive Officer (CEO) is responsible for the implementation of the Company's strategies, plans and policies, the monitoring of operational and financial performance, the assessment and control of financial, business and operational risks, the maintenance and ongoing development of a robust control framework and environment in their areas of responsibility and the implementation and oversight of the Companies climate and sustainability ambition.

The second line (Risk Function)

- The Risk function comprises the key functions of Risk Management and Compliance. Risk Management is accountable for providing independent objective quantitative and qualitative challenge and oversight and challenge of the identification, measurement, management, monitoring and reporting of material risks and for developing the RMF; and the
- Compliance Function is accountable for supporting and advising the business on the identification, measurement and management of its regulatory and conduct risks and for monitoring and reporting on the Company's compliance risk profile.
- With effect from 1 January 2023 the Actuarial Function transferred from the second line to the first line.

The third line (Internal Audit)

The Internal Audit Function provides independent and objective assessment on the robustness of the RMF and the appropriateness and effectiveness of internal control to the Board.

Sections B.3.2, B.4.2, B.5 and B.6 detail the roles, responsibilities, authority, resources, independence and reporting lines of the Risk Management, Compliance, and Internal Audit Functions respectively, and how their independence is ensured.

B.1.2 Material changes in the system of governance

As a consequence of the successful purchase of the Home portfolio from Barclays, the Company's Board with effect from 1 January 2023 is solely composed of senior management from Aviva. With effect from 30 August 2023 the Company assumed full responsibility for the Home Portfolio at which point all policies have been rebranded to Aviva (a trade name of the Company). To reflect the changed business and responsibilities the Company and its parent (AIL) have implemented an internal Framework Service Agreement (FSA) to define the management and the day to day operation of the Company, the required governance and oversight, and to formalise the roles and responsibilities.

B.1.3 Adequacy of the Company's system of governance

An assessment of the effectiveness of the Company's parent governance, internal control and risk management systems including those performed on behalf of the Company was conducted at the end of 2023, including an attestation by the immediate parent company's (AIL) CEO. Significant progress has continued to be made with enhancing the Company's management of operational risk in 2023. This will remain a key focus in 2024, along with ongoing work in areas of regulatory focus. The immediate parent company's (AIL) Chief Risk Officer (CRO) provided an independent opinion on the immediate parent company's CEO's attestation which opines on the confirms accuracy of the CEO's declaration and noted no additional qualifications or weaknesses.

B.1.4 Remuneration policy.

All staff are employed by a fellow subsidiary of Aviva plc, Aviva Employment Services Limited. All Aviva staff acting on behalf of the Company are subject to the Group's remuneration policy, which is designed to incentivise and reward employees for achieving business goals in a manner that is consistent with the Group's strategy, business plans, values and behaviours, sound and effective risk management and good governance.

Pension and early retirement schemes

There were no enhanced pension arrangements or early retirement schemes for members of the Board or key function holders in place during 2023.

B.1.5 Material transactions with the shareholder, persons with significant influence on the Company and members of the Board

The Company has a quota share reinsurance arrangement with AIL, with effect from 1 January 2006. The key terms of the agreement remain: a 100% cession rate on premiums, claims costs and underwriting expense costs is applied in respect of the underwriting year; and a requirement for the Company to retain a percentage in relation to levies.

The key management of the Company are considered to be the statutory directors. The financial statements gives details of their remuneration.

B.2 Fit and Proper Policy

B.2.1 Requirements for the persons who run the Company or who are other key function holders

For persons responsible for running the undertaking or responsible for key functions and assessment of fitness and propriety must consider their allocated responsibilities and skill and experience across the following areas:

- Insurance and financial markets;
- Business strategy and business models;
- System of governance;
- Financial and actuarial analysis;
- Regulatory framework and requirements; and
- Skills relevant to that role

The Company's requirements in respect of skills, knowledge and expertise for key function holders are set following engagement with both internal and external subject matter experts in each specialism. These requirements and qualifications are captured within individual role descriptions for each key function role.

B.2.2 Process assessing fitness and propriety

The Company has implemented processes to ensure that individuals employed within it, or acting on its behalf, are both fit and proper in line with the PRA and FCA Fit and Proper requirements for individuals subject to the Senior Managers and Certification Regime (SMCR). This means that, as part of recruitment and employee screening, an individual's career history will be assessed and validated to establish whether an individual's skills and knowledge are appropriately matched to the role. It also means that checks are in place to ensure that an individual is honest, of good reputation, has integrity and is financially sound.

The governance over the fitness and propriety of individuals includes recruitment, performance management and training. However, to ensure that the Company protects itself against employing individuals who potentially could threaten its customers, properties, facilities or reputation, the majority of its fitness and propriety processes take place at recruitment and more specifically at pre-employment screening. A minimum set of basic screening requirements has been agreed and implemented. Additional enhanced screening requirements are applied for individuals who are approved or certified under the SMCR and the fitness and propriety of these individuals is assessed annually. Individuals approved or certified under the SMCR are required to re-confirm annually their compliance with fitness and propriety requirements.

B.3 Risk Management System including the Own Risk and Solvency Assessment

B.3.1 Risk Management Framework

The Company's RMF has a key role in supporting the business to deliver its purpose for our customers, our people and our shareholder, helping the business discover, predict, understand and manage our risks, thereby maintaining a safe risk environment. The RMF is at the heart of every business decision and is key to ensuring a robust control environment. The RMF comprises the systems of governance, including Risk Policies and Business Standards, risk management processes and Risk Appetite Framework (RAF), risk oversight committees (both Board and Management) and clearly defined roles and responsibilities along with the processes the Company uses to identify, measure, manage, monitor and report (IMMMR) risks, including the use of risk models and SST.

The Company's RAF outlines the risks that the Company selects and manages in pursuit of return, the risks the Company accepts and retains up to a moderate level of and the risks the Company actively avoids or takes action to mitigate as far as practical. It comprises:

- Risk preferences: which are qualitative statements that express where the business prefers to take risk (or else accept or avoid) and why, applied to individual key risks types (e.g. GI Reserving and Inflation).
- Risk appetites: which include overarching statements that express the level of risk the business is willing to accept. The Company has risk appetites for Solvency, Liquidity, Operational, Climate and Conduct risk. Risk appetites are reviewed and approved by the Board and monitored by the Company's immediate parent (AIL) management committees.
- Risk limits: quantify more granular limits for specific defined risk exposure (e.g. maximum credit exposure limits to particular counterparties).

To promote a consistent and rigorous approach to risk management the Company has adopted a number of risk policies and business standards. The risk policies set out the Board's risk strategy appetite for risk and the expectations in respect of the management of risk whilst the Business Standards set out the mandated controls, which together with any local controls aim to keep the operational risks within tolerance . The immediate parent company Chief Executive Officer makes an annual attestation that the system of governance and internal controls are effective and fit for purpose for the Company throughout the year and this declaration is supported by an opinion from the immediate parent company's Chief Risk Officer.

Risk management processes help the business discover, predict, understand and manage our risks, thereby maintaining a safe risk environment and enabling dynamic risk-based decision making. A variety of tools and processes are available to support risk identification. Top-Down Risk Assessment (TDRA) is carried out by the Risk Management Function and identifies key organisational current and emerging risks. Bottom up risk assessment focuses on risks more granular which are connected to our operational processes, managed through Risk and Control Self-Assessment (RCSA) process which is run by the first line, with challenge by the Risk Function. It focuses on operational risks, which are recorded on iCare, the Company's risk management system. These risk assessment processes are run separately but are complementary. They are used to generate risk reports which are shared with the Board.

Risk models are an important tool in the measurement of risks and are used to support the monitoring and reporting of the risk profile and in the consideration of the risk management actions available. A range of stress tests (where one risk factor, such as a downgrade in a reinsurer credit rating) are undertaken to evaluate their impact on the business and the management actions available to respond to the conditions envisaged. For those risk types managed through the holding of capital, being the Company’s principal risk types except for liquidity risk, the Company measures and monitors its risk profile on the basis of the Solvency II Solvency Capital Requirement (SCR).

The Risk Management Function is accountable for quantitative and qualitative oversight and challenge of the IMMMR process and for developing the RMF. Internal Audit provides an independent assessment of the risk framework and internal control processes.

Aviva staff on behalf of the Company are involved in the management and mitigation of risk, with the RMF embedded in the day-to-day management and decision-making processes. The ‘three lines of defence model’ is adopted by the Company and the Aviva Group (as required by the RMF policy). First Line (the Business) is accountable for the management of all risks relevant to the business of the Company, including the implementation of the RMF and embedding of the risk culture. Second line (the Risk Function) is responsible for providing independent objective quantitative and qualitative oversight and challenge of the IMMMR processes and for developing the RMF. The third line (Internal Audit) provides an independent assessment of the RMF and internal control processes.

The Board is responsible for setting the Company's risk preferences, risk appetites, and regularly monitoring the establishment and operation of prudent and effective controls in order to assess and manage the risks associated with the Company's operations.

The Company’s position against its risk appetites is monitored and reported to the Board on a regular basis. Long-term sustainability depends upon the protection of franchise value and good customer relationships. As such, the Company has no appetite for risk of poor customer outcomes, market abuse or activities which impact market stability, integrity or fair competition, and takes all reasonable steps to comply with all conduct regulations and deliver good customer outcomes.

The Company is now a closed book as of 30 August 2023, and as at the same date assumed accountability for both distribution and underwriting, with policy renewals from that point onwards being issued under the Aviva brand. This does not impact the Company's implementation of the Risk Management Framework, with no significant or material changes to existing risk exposures given controls already in place.

B.3.2 Risk Function

The Risk Function is responsible for the design and implementation of the RMF. The Risk Function reports to the Company’s Board on material risks, together with any other specific areas of risk requested by the Board, and assists the Board and management in the effective operation of the RMF including, amongst other things, the provision of specialist analysis and quality reviews, an aggregated view of the risk profile, and an assessment of the key risks associated with the business’s strategy, and other key decisions.

The Risk Function has authority to review all areas of the Company and has full, free and unrestricted access to all activities, records, property and personnel necessary to complete its work. The Board receives an annual report and periodic verbal updates from the CRO covering material risks and concerns. The CRO has direct management accountability for the Risk Function and is responsible for prudential regulatory risk management.

Prudential risk management activities performed by the Risk Function include:

- Setting the prudential regulatory risk policy framework;
- Providing advice, support, guidance and challenge on prudential regulatory risk;
- Monitoring prudential regulatory developments; and
- Managing prudential regulatory engagement.

B.3.3 Own Risk and Solvency Assessment (ORSA)

The ORSA is the entirety of the processes and procedures employed to identify, assess, monitor, manage and report the short-term and long-term risks the Company faces or may face to determine the own funds necessary to ensure that its overall solvency needs are met at all times, and determine sufficiency of resources necessary to ensure its long-term viability.

The ORSA relies on the effective embedding of a number of elements of the RMF. The outcomes of the ORSA processes provide the Company’s Board and management with a forward-looking assessment over the Plan horizon of all material risks and the extent to which they are covered by capital or addressed by risk mitigation techniques and capital requirements projections (including under stressed and reverse stress scenarios).

The immediate parent company CEO and their direct reports are responsible for the majority of the underlying ORSA processes set out above. The Risk Function is responsible for the ORSA Policy and annual ORSA reporting.

Review and approval

The Board oversees the ORSA processes and annually approves the ORSA policy. The results of the Company's ORSA processes are also considered by the Board when reviewing the Company's strategy and plans.

The annual ORSA report brings together and summarises in a single report a high-level description of the key components of ORSA, together with key developments and outcomes during the year.

The ORSA report is produced and approved by the Board annually, or in the event that material external events or management decisions may require an update to the most recently prepared ORSA process outputs, depending upon their significance, to ensure that the Board's view on the Company's earnings, capital, liquidity, strategy and risk and control remain up-to-date. Accordingly, the occurrence of any or all of the following events are indicators of the need to consider whether an out-of- 'ad hoc' ORSA Report may be required:

- A material impact on Own Funds or diversified SCR
- The invocation of the immediate parent company's Crisis Action Leadership Team (CALT), where the impacts materially pertain to the Company; and/or
- Any potentially material change to the Company's risk profile.

The annual report is submitted to the Board, and subject to their approval shared with the PRA.

Economic capital (as a risk-based capital measure) is embedded in the Company's RMF and is used as a key input to a wide range of business and strategic decisions. The framework, supported by risk policies and business standards, sets out the areas where economic capital management information must be used as part of decision-making and risk management processes. This ensures that requirements to use economic capital are embedded within the relevant processes including, but not limited to, strategy and planning. Economic capital is calculated using the SF calculation, the appropriateness of which is reviewed annually and reported to the Board.

B.4 Internal Control System

B.4.1 System of Internal Control

The Company's principles, objectives, global controls and key requirements for ensuring effective internal control that comprise the Company's RMF are set out in Risk Policies and Business Standards derived from those applied across the Aviva Group. This includes the Operational Risk and Control Management (ORCM) Framework that provides processes for identification and recording of Operational Risks and the controls required and applied to them. Compliance is attested in the annual CEO attestation completed by the parent company. Key attributes of the internal control environment include:

- An appropriate "tone from the top". This supports the effective management of exposures, adequate resourcing, effective communication, malpractice reporting, a business ethics code that is annually signed up to by all Aviva employees acting on behalf of the Company, and a commitment to integrity, ethical behaviour and compliance;
- A clear organisational structure that supports the system of internal control and includes the effective operation of an adequately resourced three lines of defence model, appropriate and proportionate segregation of duties, a clear system of delegated authorities, clearly defined roles and responsibilities for staff, and the consideration of risk management and control responsibilities when setting objectives for, and reviewing the performance of, all staff;
- Implementation of risk policies and business standards, and consistent IMMMR of all risks;
- A common system of record for operational risk reporting (iCARE) with standardised reporting;
- Effective controls for each of its core risks which align to key business processes, and are regularly monitored and reported on; and
- A risk oversight process that provides adequate challenge to the completeness and openness of internal control and risk assessment of the Company's most material risks.

B.4.2 Compliance Function

The primary purpose of the Compliance Function is to assess and manage exposure to conduct regulatory risk. The Compliance Function is an integral part of the RMF and constitutes a key part of the Company's corporate governance, including relationships with the FCA and other regulatory bodies. The function is a critical contributor to the safe and sound operation of the Company and underpins the achievement of its strategy and business goals. The Compliance Function is led by the Chief Conduct and Compliance Officer (CCCO). The key processes that comprise the Company's compliance activity are:

- Setting the conduct policy framework;
- Providing advice, support, guidance and challenge on conduct risk;
- Monitoring conduct regulatory developments; and
- Managing conduct regulatory engagement.

Those responsible for carrying out compliance activities have authority to review all areas of the Company and have full, free and unrestricted access to all activities, records, property and personnel necessary to carry out their role, where appropriate.

The General Counsel is responsible for monitoring of legal developments.

B.5 Internal Audit Function

The Company's Internal Audit Function is led by the Internal Audit Director who reports directly to the Group Chief Audit Officer and to the Chairman of the immediate parent company's (AIL) Audit Committee.

The Internal Audit Function provides regular reports to the Company's Board on the robustness of the Company's RMF and the appropriateness and effectiveness of the system of internal control. In doing this it considers the adequacy of the Company's system of internal control to manage its business risk and to safeguard its assets and resources. It also considers the effectiveness of any actions put in place by management to address any deficiencies that might exist in the system of internal control.

Independence and objectivity

The Internal Audit Function maintains its independence and objectivity by reporting directly to the Group Chief Audit Officer and the Chairman of the immediate parent company's (AIL) Audit Committee. The parent company's Audit Committee has a duty to recommend the appointment or dismissal of the Chief Audit Officer to the parent company Board and to participate, jointly with the Group Chief Audit Officer or designee, in the determination of the objectives of the Chief Audit Officer and the evaluation of his levels of achievement, including consultation with the CEO.

The Chief Audit Officer proposes a budget which ensures that Internal Audit has sufficient skills and resources to discharge its responsibilities. Internal Audit is authorised to review all areas of the Company and has full, free, and unrestricted access to all activities, records, property, and personnel necessary to complete their work.

Internal Audit Function staff have no direct responsibility for any operational activities. There is a formal policy of rotating staff to ensure that independence is maintained. There is also a restriction on the audits that staff who have previously worked elsewhere in the Company can perform. The Internal Audit Function cannot perform any projects for management that will threaten its actual or perceived independence and objectivity.

An annual declaration of independence is signed by all members of the Internal Audit Function's staff.

B.6 Actuarial Function

With effect from the 1 January 2023, the Actuarial Function has transferred from the Risk Function to the Finance (1st line) Function. The Chief Actuary of the immediate parent, whose remit includes oversight of the Company, and Actuarial Function retain independence as a Solvency II key (control) Function and is supported in this both by the Chief Actuary retaining direct access to the Company's parent (AIL) Board Committees / Board and through dotted-line reporting into the CRO. The Chief Actuary continues to hold SMF20 regulated accountabilities. Oversight of actuarial and reserving risks and accountabilities for the SF will remains aligned to the Risk Function

The Actuarial Function is accountable for actuarial methodologies and calibrations, plus the resultant calculation of the Best Estimate Liabilities and capital requirements. The Actuarial Function produces an annual report to the Board providing all of the information necessary for the Company's Board to form their own opinion on the adequacy of Technical Provisions and on the Company's underwriting and reinsurance arrangements.

The Actuarial Function is led by the parent company Chief Actuary, who reports to the parent company CFO. The Company's CRO delegates Internal Model duties on actuarial methodology and calibration to the Actuarial Function, to ensure the Chief Actuary maintains suitable independence whilst reporting to the CFO. Persons employed in certain specific roles within the Actuarial Function are subject to the Fit and Proper policy requirements to ensure they have the requisite skills and knowledge to complete their responsibilities. (Fit and Proper requirements are considered in section B.2.)

The Actuarial Function has the authority to review all areas of the Company and has full, free and unrestricted access to all activities, records, property and personnel necessary to complete its work.

B.7 Outsourcing

Policy

The Aviva Procurement and Outsourcing Business Standard contains information on the Company's outsourcing policy, setting out the relevant responsibilities, objectives, process, and monitoring arrangements to be applied in cases of outsourcing, all of which shall be consistent with the overall strategy. The Business Standard applies equally to any externally or internally (intra-group) outsourced activity and is benchmarked against relevant regulatory expectations. The objective of this Business Standard is to ensure that adequate governance, minimum control objectives and controls for supplier-related activities are followed by all Aviva businesses, so that supply risk is managed effectively. This includes the need to ensure that, customers are being treated fairly, their best interests are protected and that the risk of potential financial, operational, contractual, and brand damage caused by inadequate management is mitigated. The standard requires a global material Outsourcing and non Outsourcing Landscape document to be produced bi-annually which captures details of all Material outsourced operational functions and activities.

The Business Standard applied to all staff involved in suppler related activities. It provides clarity to businesses on the definition of outsourcing, including where activity is delegated to an intermediary, and whether a function or activity outsourced is assessed as Material.

The objectives and controls in the Business Standard cover the following areas:
- Supply governance: business oversight of operational performance for sourcing and supply management activities;
- Sourcing: how a service provider of suitable quality is selected; and
- Supplier management: risk-based approach to management of supply contracts.

Material outsourcing will attract the highest level of rigour, including any required regulatory notification, performance and relationship reviews, regulatory compliance reviews, operational resilience reviews, and risk and control assessments. The standard and the associated controls have been updated as appropriate to align to the PRA Regulations for Outsourcing and Third-Party Risk Management (PRASS2/21) from January 2021.

Material outsourced functions and activities
The Company receives a wide range of services from within the Group. Various claims handling and fulfilment activities, including loss adjusting and property repairs are outsourced to companies outside the Group.

Jurisdiction of service providers
Services provided from within the Group and claims handling and fulfilment activities are carried out in the UK.

B.8 Any Other Information
The Company has no other material information to disclose.

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C. Risk Profile

In this Chapter

C. Risk Profile

This chapter provides information on the Company's Risk Profile.

C.1 Underwriting Risk

C.1.1 Exposure

The Company's exposure to non-life underwriting risk arises from:

- Inadequate claims reserving assumptions;
- Unforeseen fluctuations in the timing, frequency and severity of claims and claim settlements relative to expectations;
- Unexpected claims arising from a single source;
- Inaccurate pricing of risks or inappropriate underwriting of risks when underwritten; and
- Inadequate reinsurance protection or other risk transfer techniques.

As noted in A.1.2, the principal activity of the Company going forward is to administer and manage the in-force UK household insurance policies. There are also some outstanding reserves in respect of motor business that was underwritten historically.

The Company has a quota share arrangement with its parent company, AIL, with effect from 1 January 2006. The majority of written premium is ceded to AIL, although an amount of premium is excluded from this arrangement to meet the cost of levies. The Company is also a named party to Group wide external catastrophe reinsurance arrangements and participates in the Flood Re reinsurance programmes which is backed by the UK Government.

There has been a reduction Company's underwriting risk over the year to 31 December 2023. This is driven by a reduction in net claims provisions and relates to reserves prior to the start of the 100% quota share arrangement.

The Company's overall exposure to underwriting risk is measured using the SCR. QRT S.25.01 (Appendix F.1.7) shows that the Company's undiversified SCR for underwriting risk is immaterial (2022: immaterial). Underwriting risk is also measured and monitored in terms of best estimate liabilities, total sum insured and estimated maximum loss. Estimated maximum loss is an estimation of the maximum loss that could be reasonably sustained as a result of a single incident considered to be within the realms of probability.

The conflicts in Ukraine and Palestine and ongoing disruption to global supply chains have the potential to lead to heightened claims inflation in 2024 and may increase the uncertainty associated with the cost of settling general insurance claims. The Company does not have material underwriting exposure to Ukraine, Russia or Palestine and does not conduct operations in the affected region. While the impacts of heightened claims inflation can be mitigated via new business pricing actions, our ability to price for inflation is dependent on market, competitor and customer behaviour.

There has been no material change to the measures used to assess underwriting risk during the reporting period.

C.1.2 Risk concentration

The Company's general insurance business is UK domiciled, and managed and priced in the UK. Its most concentrated non-life underwriting peril is North European Windstorm.

C.1.3 Risk mitigation

The Company manages its exposure to general insurance risk through the application of control frameworks that include:

- Claims reserving that is undertaken by local actuaries and is also subject to periodic external review;
- Extensive use of data, financial models and analysis to improve pricing and risk selection;
- Underwriting limits linked to delegations of authority that govern underwriting decisions;
- Product development in a management framework that ensures products and propositions meet customer needs;
- Product limits and exclusions;and
- Governance of outsourced functions writing products on behalf of the Company.

The primary technique used to mitigate underwriting risk is reinsurance as described in section C1.1.

The management of insurance risk is overseen by the Board.

C.1.4 Stress and scenario testing and sensitivity analysis

Descriptions of the methods used, assumptions made and outcomes of stress and scenario testing and sensitivity analysis are provided in section C.7.1.

C.1.5 Special purpose vehicles

The Company has not transferred underwriting risk to special purpose vehicles, as defined by the SII Directive.

C.2 Market Risk

C.2.1 Exposure

The Company's exposure to market risk arises from the risk of adverse financial impact resulting directly or indirectly from fluctuations in interest rates and inflation. Market risk arises due to fluctuations in both the value of liabilities and the value of assets held.

There has been an increase in the Company's overall market risk exposure during the period.

The Company's overall exposure to market risk is measured using the SCR. QRT S.25.01 (Appendix F.1.7) shows that the Company's undiversified SCR for market risk is £1,937 thousand (*2022:* £115 thousand). The increase is primarily due to credit risk associated with the Company's material increase in cash-like instruments held in Collective Investment Undertakings over the period. The Company's UK Government bond holdings matured during the year, with maturity proceeds also held in these cash like instruments.

Given the reinsurance the Company has in place as outlined in section C1.1, the Company has limited interest rate exposure from its claims liabilities, and has limited interest rate asset sensitivity. There is no exposure to foreign currency exchange rates.

There has been no material change to the measures used to assess market risk during the reporting period.

C.2.2 Risk concentration

The Company holds cash like instruments via liquidity funds held in Collective Investment Undertakings. It is exposed to any concentration in individual names within these funds.

C.2.3 Risk mitigation

The Company manages market risk within its market risk framework, within local regulatory constraints and in line with established Group policy. The management of market risk is overseen by the Asset Liability Committee ("ALCO") and the Board.

The Company did not have any derivatives during the year or at year-end.

C.2.4 Stress and scenario testing and sensitivity analysis

Descriptions of the methods used, assumptions made and outcomes of stress and scenario testing and sensitivity analysis are provided in section C.7.1.

C.2.5 Additional information

There is no significant impact on the Company's exposure to market risk.

C.3 Credit Risk

C.3.1 Exposure

The Company's exposure to credit risk arises from the risk that it will incur a financial loss from the default or failure of third parties to meet their payment obligations to the Company, or variations in market values as a result of changes in expectations related to these risks.

The Company's approach to managing credit risk recognises that there is a risk of adverse financial impact resulting from fluctuations in credit quality of third parties including default, rating transition and credit spread movements. The Company's credit risks arise principally from insurance debtors, reinsurance counterparties and bank deposits.

The Company's management of credit risk includes implementation of credit risk management processes as part of the wider risk framework (including limits frameworks), and reporting and monitoring of exposures against pre-established risk criteria. The management of credit risk is overseen by the ALCO and the Board.

Risk mitigation techniques are used where and when deemed appropriate. These are utilised where possible to remove residual unwanted risks, as well as to bring or keep exposure limits within appetite.

The principal basis used to measure the Company's exposure to credit risk is the SCR. QRT S.25.01 (Appendix F.1.7) shows that the Company's undiversified SCR for credit risk is £2,731 thousand (*2022: £3,164 thousand*). Counterparty risk relates to the risk associated with reinsurers and insurance debtors. The Company is additionally exposed to the credit risk associated with its Collective Investment Undertakings included in the market risk SCR reported in the QRT as described in section C2.1. There has been no material change in the Company's counterparty risk exposure over the reporting period.

The following metrics are also used when measuring and assessing its credit risk exposure and to support risk management actions and investment decisions:

- Maximum exposure: credit exposure of the Company's financial assets to counterparties;
- External credit rating: available Moody, Standard & Poor and Fitch ratings;

There has been no material change to the measures used to assess credit risk during the reporting period.

The overall credit quality of the Company's exposures is strong. At 31 December 2023, reinsurance assets are with highly rated counterparties. Collective Investment Undertakings are held with highly rated banking institutions or liquidity funds.

C.3.2 Risk concentration

The Company has exposure to its immediate parent AIL via the reinsurance quota share arrangement discussed in section C.1.1. The Company is also a named party to Group wide external catastrophe reinsurance arrangements, and hence could independently access external catastrophe reinsurance recoveries due.

C.3.3 Risk mitigation

As described in section C3.1, the Company has in place a credit control framework to manage credit risk.

In accordance with the requirements of the Group Financial Risk Mitigation Business Standard the Company assesses and documents the effectiveness of arrangements to mitigate credit risk are assessed and documented. On-going monitoring is carried out by reporting management information to the ALCO and Board, against pre-defined trigger points, to enable appropriate oversight and to prompt action if effectiveness deteriorates.

C.3.4 Stress and scenario testing and sensitivity analysis

Descriptions of the methods used, assumptions made and outcomes of stress and scenario testing and sensitivity analysis are provided in section C.7.1.

C.3.5 Additional information

The Company's exposure to credit risk arises primarily through its reinsurance arrangements. There has been no significant impact on the credit risk exposure to date.

C.4 Liquidity Risk

C.4.1 Exposure

The Company’s exposure to liquidity risk arises from the risk that its liabilities cannot be settled, in a timely and cost-effective manner, as they fall due because of insufficient liquid assets. Liquidity risk may arise from uncertainty of the value and timing of liabilities or the ability to realise assets to produce cash to meet obligations. The Company assesses liquidity risk under a range of scenarios and various levels of liquidity stress. Sources of liquidity risk include:

- Insurance underwriting e.g. catastrophe claims arising from adverse weather events;
- Variances of actual operational cash flow from shorter-term forecasts; and
- Timing mismatches between claims payments, premium income and reinsurance recoveries.

The principal bases used to measure and assess the Company’s exposure to liquidity risk are absolute liquidity coverage relative to pre-defined appetites and the quantum of certain liquid assets. These are calibrated to ensure sufficient liquidity to meet expected liquidity requirements following an extreme liquidity-specific stress events covering both short-term and long-term stress scenarios.

There has been no material change to the measures used to assess liquidity risk during the reporting period.

There were no material changes in the Company’s exposure to liquidity risk throughout the year and the Company’s liquidity profile was maintained within appetite.

C.4.2 Risk concentration

The credit limit framework described in section C.3.1 above also avoids concentrations of liquidity risk by preventing investment in a restricted number of issuers, asset classes and sectors. The Company’s has set its liquidity risk appetite to ensure it has sufficient liquid funds to meet its expected obligations as they fall due.

C.4.3 Risk mitigation

The Company manages its liquidity risk by considering the liquidity impact before accepting new risks and managing its existing liquidity profile by:

- Monitoring of projected short-term cash flow needs;
- Setting liquidity risk appetites which require that sufficient liquid resources be maintained to cover net outflows in a stress scenario;
- Defining trigger levels that enable action to be taken before those levels are breached; and
- The Company’s immediate parent, AIL, maintaining a Capital and Liquidity Management Action Plan (CLMAP) which details management actions to address capital and/or liquidity requirements in a significant stress scenario.

The Company monitors the effectiveness of liquidity risk mitigation techniques as follows:

- The internal controls that enable effective liquidity risk management are subject to assurance testing as part of wider testing undertaken within AIL to ensure they operate effectively; and
- Liquidity positions are regularly reported to and monitored by the ALCO and Board against pre-defined trigger points to enable appropriate oversight and actions to take place if effectiveness deteriorates.

C.4.4 Expected Profit Included in Future Premium (EPIFP)

The amount of EPIFP, calculated in accordance with Article 1 of the SII regulations and included within the valuation of the Company’s Technical Provisions as at 31 December 2023 is £nil thousand (*2022: £nil thousand*). (See the Own Funds QRT S.23.01.01, Appendix F.1.6.).

C.4.5 Stress and scenario testing and sensitivity analysis

Descriptions of the methods used, assumptions made and outcomes of stress and scenario testing and sensitivity analysis are provided in section C.7.1.

C.4.6 Additional information

There is no significant impact on the Company's exposure to liquidity risk.

C.5. Operational Risk

C.5.1 Exposure

The Company's exposure to operational risk arises from the risk of direct or indirect loss, caused by inadequate or failed internal processes, people and systems, or external events including changes in the regulatory environment. The Company has a limited appetite for operational risk and aims to reduce these risks as far as commercially sensible.

Conduct risk, an element of operational risk, is where the Company does not achieve positive or fair customer outcomes. Management of conduct risk continues to be a key priority for the Company across the whole lifecycle of its products, and throughout the end to end journey of its customers, with robust governance and metrics embedded across the organisation.

The Company also seeks to manage its exposure to reputational risk, which is the risk of loss to the Company's franchise value from damage caused to the Company's brands or reputation. Examples of factors, regardless of whether authenticated or not, which could damage the Company's brands or reputation include litigation, employee misconduct, operational failures, the outcome of regulatory investigations, media speculation and negative publicity, disclosure of confidential client information or inadequate services.

As part of the wider Group strategy of digital customer interaction, its use of advanced data analytics and the increasing cyber security threat, together with regulators' attention to conduct issues, the Company has increased its inherent exposure to risks such as data theft, conduct breaches and customer service interruption arising from IT systems failure. The Company and its parent have sought to contain and reduce exposure to these risks through on-going investment in programmes to improve IT security and resilience, disaster recovery, data governance and outsourcing. The Company has an Operational Risk and Control Management Framework, which integrates the results of the risk identification and assurance activities carried out across the Company's three lines of defence.

There were high levels of regulatory change and challenging external drivers impacting the Company and its Parent, with significant resources allocated to enable the fulfilment of obligations. In 2023, an enhanced approach to monitoring and measuring the effectiveness of processes, systems and controls in relation to our Customer Conduct Risk to adhere to the Consumer Duties outcomes and principles was implemented. This is delivered principally through enhanced governance structures, activity to review customer communications and customer journeys, along with refining MI and insight to meet regulatory expectations.

Operational risks are initially identified through the Common Operational Risk Register (CORR) and assessed against implemented controls. Residual risk, outside tolerance, is given prioritised management action to reduce it within tolerance. Operational risk is quantitatively assessed on the basis of financial loss and misstatement. Potential reputational and conduct impacts are qualitatively assessed. There has been no material change to the measures used to assess operational risk during the reporting period.

QRT S.25.01 (Appendix F.1.7) shows that the Company's undiversified SCR for operational risk is £1,125 thousand *(2022: £1,112 thousand)*. The Company also produces specific conduct risk management information used to measure and analyse its exposure to conduct risk.

The have been no material changes, during the year, to the Company's exposure to operational risk.

C.5.2 Risk concentration

Going forward the Company's products are marketed under the 'Aviva' brand, enabling leverage on the strength of the brand and supporting delivery of the Company's business strategy. The Company is therefore vulnerable to any operational failures that adversely impact public perception of the 'Aviva' brand.

C.5.3 Risk mitigation

Operational risks are considered by the Company to be preventable and are managed through business controls. The Company's operational risk strategy is to improve its business processes to:

- Reduce operational risk and associated losses, thereby improving cost to income ratio and variability in financial performance;
- Improve customer outcomes and employee satisfaction; and
- Sustain customer confidence and a positive regulatory reputation.

The Group's business standards (which apply to the Company) set out the minimum control objectives and controls that each business area is required to operate. Operational risk tolerances are quantitative boundaries that constrain specific risk-taking activities at an operational level.

The Company records and analyses operational risk events to understand the root cause and ensure remedial action is taken, lessons are learnt and, if the event impacts customers, they are treated fairly. This includes risk events that do not give rise to a financial loss, such as near misses or fortuitous gains. This assessment enables the Company to highlight areas for improvement, implement corrective actions to avoid recurrence, and improve its understanding of operational risk.

The Company has identified business critical functions and has exit and termination plans and business continuity and disaster recovery plans in the event of supplier failure. These plans are reviewed at least annually.

The Company's three lines of defence all monitor the effectiveness of the controls that are in place against operational risk. Further details of the three lines of defence are included in section B.1.1, including the specific roles and responsibilities of each line. Operational risk is overseen by the Board.

C.5.4 Stress and scenario testing and sensitivity analysis

Descriptions of the methods used, assumptions made and outcomes of stress and scenario testing and sensitivity analysis are provided in section C.7.1.

C.6 Other Material Risks

The Company has no material information to disclose regarding other material risks.

C.7 Any Other Information

C.7.1 Stress and scenario testing and sensitivity analysis

Stress and Scenario Testing (SST) is a fundamental element of the Company's Risk Management Framework which is embedded within the Company's decision-making, strategy and planning activities. SST provides insight into key risk exposures and dependencies of the Company; considering resilience of potential changes to these exposures and dependencies; and anticipating a range of possible outcomes. The evaluation of the potential impacts on the Company's capital and liquidity positions enables the Company to identify and prepare for appropriate ways to mitigate and manage the realisation of such impacts.

The Company carries out a range of sensitivity tests (where one risk factor, such as interest rates, is assumed to vary) and scenario tests (where combinations of risk factors are assumed to vary) to evaluate their impact on the business and to enable identification of plausible management actions to mitigate such impacts.

C.7.1.1 Stress and scenario testing

The SST completed for the Company, has considered potential impacts from the most significant risks to the Company of counterparty credit risk (arising from both the quota share arrangement in place with its parent company, AIL and the participation in the Group catastrophe reinsurance programme) and operational risks (arising from outsourcing operations and internal failings).

The outcome of this SST demonstrates that the Company is resilient to a range of potential adverse events and that the Company has management actions that could be executed in a timely manner, to mitigate the potential impacts from Company-specific or market-wide events. The Company also considers, and is inherently considered within, the SST that is completed by its immediate parent company, AIL.

A range of assumptions are made in the development of SST and the measurement of resilience to such events. These assumptions are defined by suitable experts and, where applicable, by the Regulators.

C.7.1.2 Sensitivity analysis

Management use sensitivity analyses to assess a range of single factor standalone impacts of differing levels of severity on the capital and liquidity positions of the Company and to ensure that the Company has a sufficient range of plausible management actions that could be executed in a timely manner to mitigate the potential impacts.

The sensitivity analysis performed by the Company includes consideration of the sensitivity of its SII cover ratio, determined according to SII Regulations, to a range of economic assumptions.

For the Company, this includes consideration of impacts from changes in interest rates and changes in reinsurer ratings. The results of these analyses demonstrate that, after consideration of any management actions that may be required, in extreme scenarios, the Company retains a SII surplus. This limited impact is primarily driven by the asset holdings, which are predominately UK Government Bonds and Collective Investment Undertakings with holdings in liquid funds and the extensive reinsurance arrangements in place.

C.7.2 Prudent Person Principle

The Company ensures that its assets are invested in accordance with the Prudent Person Principle as set out in Article 132 (Directive 2009/138/EC) and in the PRA Supervisory Statement (SS1/20) through the collective application of its risk policies and business standards. These ensure that the Company invests in assets whose risks it can properly identify, measure, monitor, manage, control and report, and appropriately take into account in the assessment of its overall solvency needs having regard to the term and nature of its liabilities. The Company's Asset Liability Management Business Standard and certain provisions of the Investment Management Business Standard contain mandatory requirements to ensure that the Company develops its own set of key risk indicators and takes into account the risks associated with its investments without relying only on the risk being adequately captured by the capital requirements. Given the relatively small value of the Company's retained liabilities, it achieves this by investing in low-risk Collective Investment Undertakings with holdings in liquid funds.

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D. Valuation for Solvency Purposes

In this Chapter

D. Valuation for Solvency Purposes

The 'Valuation for Solvency Purposes' section of the report provides a description of the bases, methods and main assumptions used in the valuation of assets, technical provisions and other liabilities for each material asset and liability class.

The Company's IFRS balance sheet is presented in column (b) of the following table, in accordance with the classification of assets and liabilities used in its financial statements. The captions used in the table are from the balance sheet QRT S.02.01, rather than the financial statements. The references given in column (a) are to relevant accounting policies and notes provided in the financial statements.

A number of reclassifications, required to align the Company's IFRS balance sheet as shown in its financial statements, to the classifications required for the prescribed format of the SII balance sheet QRT, are given in column (c). The most significant reclassifications are:

- Under the SII Regulations all cash flows relating to premiums not overdue, and policyholder tax are included within Technical Provisions. In the IFRS balance sheet certain of these amounts are included within insurance and intermediaries receivables and other liabilities respectively. Cashflows relating to reinsurance payables are included with reinsurance recoverables under the SII Regulations, and within reinsurance payables in the IFRS balance sheet.
- Amounts payable to Group companies under IFRS, are reclassified within the SII balance sheet to the relevant underlying nature of the balance; and
- Investments including cash equivalents are reclassified under SII.

The Company's assets and liabilities, as valued under IFRS and reclassified in line with SII Regulations, are shown in column (d). The Company's SII balance sheet is summarised in column (e) and detailed in the balance sheet QRT S.02.01 included in Appendix F.1.1. Differences between the valuation of the Company's assets and liabilities under SII and IFRS are presented in column (f).

Where the valuation of assets and liabilities is the same under IFRS and SII, a description of the bases, methods and main assumptions can be found in the accounting policies and notes of the Company's financial statements. If the valuation is materially different, a description of the bases, methods and main assumptions used under SII is given in Sections D.1, D.2.1 and D.3 below.

Assets and other liabilities have been valued, according to the requirements of the SII Regulations, at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction. The value of other liabilities is not adjusted to take account of the impact of changes in own credit standing of the Company.

The Company applied the following hierarchy of valuation approaches:

1. Quoted market prices in active markets for the same assets or liabilities;
2. Quoted market prices in active markets for similar assets and liabilities (with adjustments to reflect differences where necessary);
3. Alternative methods of valuation.

The Company considers markets to be active where transactions take place with sufficient frequency and volume for pricing information to be available on an ongoing basis. Where the Company has concluded that markets are not active, alternative methods for valuation are used. The assets classified as Level 1 and Level 2 under IFRS 13, are deemed as market consistent under SII. The assets classified as Level 3, for which there is no active market, are considered to use alternative valuation methods under SII. The Company has not used any alternative methods of valuation.

Balance Sheet – IFRS and SII

As at 31 December 2023 £000s	Note in financial statements (a)	IFRS balance sheet classified according to financial statements (b)	Reclassification of IFRS balances to SII balance sheet categories (c)	Reclassified IFRS balance sheet (d) =(b)+(c))	SII balance sheet (e)	Valuation differences between SII and IFRS (f) =(e)-(d)
Financial investments						
Collective investment undertakings	N & 11		103,409	103,409	103,409	—
Reinsurance recoverables	J & 16	30,643	7,910	38,553	24,634	(13,919)
Receivables						
Insurance and intermediaries	O & 12	6,320	(6,320)	—		
Reinsurance	O & 12	5,643	496	6,139	6,139	—
Trade, not insurance	O & 12		(52)	(52)	(52)	—
Cash and cash equivalents	Q & 21	103,447	(103,409)	38	38	—
Prepayments and accrued income	13	347		347	347	—
Assets		**146,400**	**2,034**	**148,434**	**134,515**	**(13,919)**
Technical provisions	J & 16	12,026	3,527	15,553	(37,132)	(52,685)
Payables and other financial liabilities						
Insurance and intermediaries payable	P & 18	(75)		(75)	(75)	—
Reinsurance payables	P & 18	(28,832)	(7,910)	(36,742)	(36,742)	—
Payables (trade, not insurance)	P & 18		(34,546)	(34,546)	(34,546)	—
Amounts due to Group companies	P & 18	(34,050)	34,050	—		—
Other liabilities						
Accruals	R & 19	(1,953)	1,953	—		—
Other liabilities	R & 19	(11,426)	892	(10,534)	(9,763)	771
Liabilities		**(64,310)**	**(2,034)**	**(66,344)**	**(118,258)**	**(51,914)**
Excess of assets over liabilities		**82,090**	**—**	**82,090**	**16,257**	**(65,833)**

D.1 Assets

Assets have been valued according to the requirements of the SII Directive and related guidance; the basis of the SII valuation principle is the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction. A description of the basis of valuation under SII along with valuation differences between the SII bases and the IFRS financial statements, by asset class, is provided below; if the valuation method has been described in the financial statements it has not been included in this section.

D.1.1 Collective investment undertakings

The Company's collective investment undertakings are all invested in highly liquid investments that are readily convertible into cash and valued on the basis of the liquid investments they hold. The Company's collective investment undertakings are subject to an insignificant risk of change in value.

In the IFRS financial statements collective investment undertakings are valued at fair value. This is consistent with SII.

D.1.2 Reinsurance recoverables

Reinsurance recoverables are calculated as the probability-weighted average of discounted future cash flows relating to reinsurance contracts, adjusted for the expected losses due to counterparty default. Although established separately, reinsurance recoverables are valued on the same basis and using the same methodology and assumptions used to derive Technical Provisions - Best Estimate Liabilities, as described in Section D.2, subject to the following:

- Internal expenses are only allowed if they are recoverable under the reinsurance agreement;
- Where the timing of recoveries diverges from that for payments a separate projection is used;
- Allowance for risk of default depends on the credit rating and exposure to the reinsurance counterparty; and
- Reinsurance assets take into account reinsurance commissions.

Reinsurance recoverables, consistent with the calculation of Technical Provisions - Best Estimate Liabilities, includes expected recoveries from pre-inception contracts where they occur within the premium or claims provisions.

Cash flows relating to future reinsurance arrangements comprise both expected recoveries and expected reinsurance premium payments. This means reinsurance contracts which are expected to be written are taken into account and thus assumptions in relation to the likely future reinsurance purchasing decisions are required.

The Company has a significant exposure to its parent company, AIL, arising from the quota share reinsurance agreement. Further details are set out in Section C.3.2.

The lower valuation under Solvency II is driven by the lower valuation of technical provisions (refer to section D.2.3) and a different allowance for counterparty default risk.

The Company does not have any Special Purpose Vehicles.

D.1.3 Prepayments

Prepayments are classified as Other Assets on the SII Balance Sheet. Prepayments are valued at their fair value, which is considered to be the same as their cost.

D.1.4 Changes made to recognition and valuation bases and estimations during the reporting period

The Company has adopted International Financial Reporting Standard (IFRS) 17 Insurance Contracts (IFRS 17) from 1 January 2023 and comparatives have been retrospectively restated from the transition date of 1 January 2022. The Company has also adopted IFRS 9 Financial Instruments (IFRS 9) from 1 January 2023, which has not resulted in any measurement differences. Further information on the changes to comparative amounts is provided in note 1 of the Company's financial statements.

There were no other changes made to the bases used to recognise and value assets, or to their estimations during the reporting period.

D.1.5 Deferred tax assets and liabilities

Deferred tax is determined on a non-discounted basis in accordance with International Accounting Standard (IAS) 12, principles on temporary differences between the economic value of assets or liabilities on the SII balance sheet and their tax base.

Deferred tax assets and liabilities are recognised separately on the Solvency II balance sheet to the extent that deferred tax asset cannot be offset against corresponding deferred tax liabilities.

The deferred tax balances in the Solvency II balance sheet differ from those already recognised in the IFRS balance sheet as a result of the differences between the IFRS and Solvency II balance sheet valuation and consequential impact on recognition of deferred tax assets. The largest impact arises from the derecognition of the IFRS asset for insurance acquisition cashflows that arose on the acquisition of renewal rights described in section A.1.2.

D.2 Technical Provisions

This section provides a definition of SII Technical Provisions, the methodology and main assumptions used in the valuation of the SII Technical Provisions, the total value of SII Technical Provisions split by material lines of business, a comparison of the valuation of SII Technical Provisions with IFRS Technical Provisions and a description of the level of uncertainty in Technical Provisions.

D.2.1 Valuation of Technical Provisions

SII Technical Provisions are summarised in the following table. All figures are gross of reinsurance. They are also detailed in the QRT S.17.01 (Non-life Technical Provisions) and S.12.01 (Life Technical Provisions), see Appendix F.1.3.

As at 31 December 2023 £000s	Best Estimate Liabilities	Risk Margin	Technical Provisions
Line of Business			
Motor vehicle liability & Other Motor insurance	791	—	791
Fire and property damage	31,100	100	31,200
General liability insurance	1,090	1	1,091
Non-life insurance obligations	**32,979**	**101**	**33,080**
PPOs other than health insurance	4,051	—	4,051
Life insurance obligations	**4,051**	**—**	**4,051**
Total	**37,030**	**101**	**37,131**

Whilst the Company only conducts non-life insurance activities, it also has life insurance obligations in the UK in relation to annuities stemming from non-life insurance contracts (PPO). PPO are classified as Technical Provisions - Life (excluding health and index-linked and unit-linked), within the prescribed format of the SII Balance Sheet.

An explanation of the differences between the SII valuation of Technical Provisions and the valuation in the Company's financial statements under IFRS is given in section D.2.3.

D.2.1.1 Non-life Best Estimate Liabilities

The following general principles apply to the valuation of Best Estimate Liabilities for non-life and health (similar to non-life) business:

- A Best Estimate is one that represents the expected outcome from the range of possible outcomes for the future and is reasonable and realistic taking account of all the uncertainties involved.
- A consistent approach has been applied across all non-life and health (similar to non-life) business.
- The calculation of Technical Provisions is performed on a going concern basis. This means that it can be assumed that contracts run to their conclusion and as a result a proportion of expected future costs will be covered by future business.

The Company's Best Estimate Liabilities are valued based on the present value of future cash flows discounted using relevant risk-free interest rates adjusted for the Prudential Regulation Authority ("PRA") prescribed credit risk adjustment and Volatility Adjustment at the valuation date. The cash flows that are considered when calculating the Best Estimate Liabilities derive from:

- In-force and expired contracts;
- Contracts that have not yet incepted but that the Company has an obligation to enter into at the valuation date (pre-inception contracts); and
- Future cancellations or endorsements by the policyholder.

Best Estimate Liabilities comprise a claims provision and a premium provision. The claims provision includes cash flows relating to events that occurred before the valuation date, whether reported or not. The cash flows include premiums, net claims costs and expenses. The premium provision includes cash flows relating to future claim events that have not yet occurred, but that are covered by existing contracts and legally binding pre-inception contracts. The cash flows include premiums, net claims and expenses, in respect of future claim events. Where future premium cash flows are expected to exceed projected future claim and expense cash flows, the premium provision is negative as is the case for Fire and Other Damage to Property.

When modelling these cash flows the inflows are considered separately from the outflows. Claims costs take into account recoveries from salvage and subrogation. Expenses include administrative, investment management, loss adjustment and acquisition expenses including commissions and premium taxes.

Claims costs

The ultimate cost of outstanding claims is estimated using a range of standard actuarial claims projection techniques. The main assumption underlying these techniques is that the Company's past claims experience can be used as a basis to project future claims. Therefore, these methods extrapolate the development of paid and incurred losses, average costs per claim and claim numbers based on the observed development of earlier years. The recent period of elevated claims inflation and supply chain disruption has distorted historic development patterns. The Company has developed bespoke inflation models to help quantify these impacts. Explicit overlays can then be made to the outputs from the standard reserving tools where necessary.The estimation of ultimate claims costs is done at the level of homogeneous risk groups. These groups are mapped to SII lines of business.

Qualitative judgement is used to reflect changes in external factors such as public attitudes to claiming, economic conditions, levels of claims inflation, judicial decisions and legislation, as well as internal factors such as portfolio mix, policy conditions and claims handling procedures.

Premium provisions
Premium provisions are estimated by selecting an exposure measure and using that to establish the unearned and pre-inception exposure. Claims cost projections are set for each future period using trends in historic claims data adjusted for known anomalies in the data that are not expected to be repeated in the future, changes in mix and volume of business and to allow for the impact of projected claims inflation. These cost projections are then applied to the predicted exposure to determine the cash flows.

Expenses
Expenses are adjusted for expense and claims inflation and allocated between the claims and premium provisions. They are analysed by homogeneous risk group or at a minimum by SII line of business. Future administrative costs and commission payments are projected using best estimate expense forecasts. Investment expenses are modelled as a percentage of Technical Provisions. Future unallocated loss adjustment expense provisions are set in relation to expected claims levels.

Events Not in Data (ENID)
ENID are events not deemed to be captured by the data which need to be separately allowed for within the best estimate calculations to take appropriate account of uncertainty. Two types of ENID are considered: “known unknowns”, which are possible future scenarios that can be anticipated and “unknown unknowns”, which are future scenarios that are completely unexpected. No allowance is made for “unknown unknowns” as by definition, they cannot be known or quantified.

Allowances for “known unknowns” are made using scenario analysis to cover any foreseeable event with a potentially material impact. A core list of events is specified which are considered as the starting point for the analysis. ENID are considered both at SII lines of business level, and at portfolio level with allocations to SII lines of business, depending on the scenario being considered.

Discounting
All cash flows are discounted using the appropriate SII yield curve in the relevant currency, as published by the PRA. The yield curve is based on the risk free rate at the valuation date and is adjusted by the PRA for prescribed credit risk adjustment (which may be either zero or non-nil) and Volatility Adjustment. Payments are assumed to occur either mid-month or mid-year. Cash flows are modelled in monthly time intervals for the first 10 years and annually thereafter.

Future management actions
There are no future management actions assumed in the calculation of the Company’s gross of reinsurance Best Estimate Liabilities as at 31 December 2023.

D.2.1.2 PPO Best Estimate Liabilities
The Company’s Best Estimate Liabilities for PPO, in common with non-life business, are valued based on the present value of future cash flows discounted using the relevant risk-free interest rate adjusted for the PRA prescribed credit risk adjustment and Volatility Adjustment at the valuation date. The cash flows that are considered when calculating the Best Estimate Liabilities for PPO derive from:
- Payment of claims benefits: with the majority of PPO providing payments relating to care needs of the claimant, with a smaller number providing loss of earnings payments; and
- Expenses: these are relatively small (compared to the size of claims benefits) administrative costs in relation to each PPO.

PPO Best Estimate Liabilities use life insurance actuarial methods and techniques to estimate appropriate assumptions for each individual claimant.

Discounting

PPO cash flows are discounted using the appropriate SII yield curve adjusted for the PRA prescribed credit risk adjustment and Volatility Adjustment. The methods are consistent with those applied to non-life cash flows.

Longevity assumptions
Assumptions are made in relation to future longevity. These assumptions are updated annually and based on the latest general mortality assumptions for the population as a whole (including future expected changes in mortality), as well as any impairment to life expectancy on individual PPO based on independent medical opinions.

Inflation assumptions
PPO payments escalate based on indices specified at the time of settlement of the PPO. The majority of PPO claims escalate based on an Annual Survey of Hours and Earnings index (ASHE) with a smaller number escalating in line with the Retail Price Index ("RPI"). Assumptions are therefore required for the future escalation of these indices. The Company assumes that, over the longer term, the future escalation of the ASHE indices will be linked to RPI within the UK economy and uses market consistent views of future RPI inflation as the basis to project future ASHE inflation. Adjustments are then made to allow for any expected differences between future ASHE inflation and future RPI inflation.

D.2.1.3 Risk Margin
The Risk Margin is an estimate of the amount, in addition to the Best Estimate Liability, that a third party would expect to receive in order to assume ownership of the Company’s insurance obligations. The Risk Margin calculation takes material underwriting, non hedgeable

market (except interest rate), credit and operational risk into account. Once calculated it is allocated to each SII line of business, although on materiality grounds some SII lines of business are allocated no Risk Margin.

The Company's Risk Margin is £101 thousand (*2022; £188 thousand*) as at 31 December 2023.

D.2.1.4 Simplifications
Best Estimate Liabilities
In some areas of the calculation of the SII Best Estimate Liabilities, simplified methods have been used. The simplifications used have been assessed and have no material impact on the value of SII Best Estimate Liabilities. Where simplified methods are used, these are documented and justified in the Company's reserving reports and documentation. The main simplifications within the calculation of SII Best Estimate Liabilities are:
- The Company's Best Estimate Liabilities include a provision in relation to ENIDs. For the purposes of discounting cashflows, it is assumed that ENIDs have the same cashflow profile as other claims.
- Cashflows are modelled in monthly time intervals for the first 10 years and annually thereafter. For the purposes of discounting, all payments are assumed to occur mid-month or mid-year as dictated by the time intervals used.
- When calculating provisions for potential reinsurer default, reinsurance assets are grouped by reinsurer counterparty credit rating and within each credit rating the same probabilities of default are assumed.
- Gross premium debtors are split by class of business and payment date based on the split of written premium.
- The volume of Legally Obliged Unincepted business has been estimated based on a proportion of January's planned written premium.

D.2.1.5 Material changes in the relevant assumptions compared to the previous reporting period
There were no material changes in the relevant assumptions made in the calculation of Technical Provisions compared to the previous reporting period.

D.2.2 Level of uncertainty
The actual cost of settling insurance obligations may differ from the Best Estimate Liabilities because experience may be worse than assumed or future claims inflation may differ from that expected. There are a number of potential developments that would have a material adverse impact on the Best Estimate Liabilities value including:
- Catastrophic weather events;
- Unanticipated legislative changes; and
- Unanticipated inflation.

Specific areas of uncertainty are:
- Given the nature of the Company's business, on a gross of reinsurance basis the uncertainty around future weather claims experience is the largest risk the Company is exposed to. The Company has extensive reinsurance in place against these claims so net of reinsurance the level of uncertainty is reduced.
- Gresham's has extensive reinsurance in place which materially reduces the level of uncertainty.

D.2.3 Material differences between the SII and IFRS valuation bases
The following table summarises gross of reinsurance SII Technical Provisions by material line of business and compares these to IFRS reclassified Technical Provisions.

Technical Provisions as at 31 December 2023 £000s	Best Estimate Liabilities	Risk Margin (unaudited)	Technical Provisions	IFRS reclassified Technical Provisions	Difference between SII and IFRS reclassified Technical Provisions
Non-life insurance obligations	**32,978**	**102**	**33,080**	**(19,644)**	**(52,724)**
– Motor vehicle liability & Other Motor insurance	791	—	791	1,138	347
– Fire and property damage	31,100	100	31,200	(21,575)	(52,775)
– General liability insurance	1,090	1	1,091	796	(296)
Life (excluding health and index-linked and unit-linked) (PPO)	**4,051**	**—**	**4,051**	**4,090**	**39**
Total	**37,031**	**101**	**37,130**	**(15,553)**	**(52,685)**

The material differences between the SII and IFRS valuation bases are summarised below:
- The IFRS provisions include an asset for insurance acquisition cashflows, related to acquiring the renewal rights to in-force UK household insurance policies from Barclays described in section A.1.2. This provision is released under Solvency II.
- SII Technical Provisions include the Risk Margin, which is not included within IFRS Provisions, and which increases SII Technical Provisions compared to IFRS Provisions;
- A Risk Adjustment is included within IFRS Provisions but removed under SII. This impacts all lines of business and reduces SII Technical Provisions compared to IFRS Provisions;
- Discount rates used in Solvency II vary from those used in IFRS and all lines of business are affected by these differences. Solvency II best estimate liabilities are valued as set out in section D.2.1.1. Whereas IFRS liabilities are valued using a risk-free rate plus an Illiquidity premium that reflects the liquidity characteristics of the liabilities.
- The liability for remaining coverage and loss component established under IFRS for all Non-life lines of business is replaced with a Best Estimate premium provision which incorporates the expected cost of claims and expenses on the unearned periods of exposure. This typically leads to a lower premium provision under SII than the equivalent liability for remaining coverage under IFRS. This difference impacts all non-life lines of business.

- Under SII, provisions are established for Legally Obliged Unincepted Business, whereas these provisions are not included within the IFRS valuation basis unless contracts are identified as being onerous. This difference impacts all Non-life lines of business. This will reduce SII Technical Provisions compared to IFRS Provisions.

D.2.4 Volatility Adjustment

The Volatility Adjustment removes temporary distortions in spreads caused by illiquidity in the market or extreme widening of credit spreads, in particular in relation to government bonds. The PRA has approved the Company's application to apply a Volatility Adjustment (PRA reference number: 2191473). The impact of the Volatility Adjustment on Technical Provisions, Basic Own Funds, Eligible Own Funds to meet the SCR, the SCR (unaudited), Eligible Own Funds to meet the Minimum Capital Requirement (MCR) and the MCR is detailed in the Long Term Guarantees and Transitional measures QRT S.22.01 (see Appendix F.1.5). The impact of removing the Volatility Adjustment from gross SII Technical Provisions would be to increase their value by less than £1,000 thousand.

D.2.5 Other reliefs

No transitional provisions have been applied in the calculation of SII Technical Provisions.

D.3 Other Liabilities

Other liabilities have been valued according to the requirements of the SII Directive and related guidance; the basis of the SII valuation principle is the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction. A description of the basis of valuation under SII along with valuation differences between the SII bases and the IFRS financial statements, by material class, is provided below; if the valuation method has been described in the financial statements it has not been included in this section.

The Company's financial statements provide information about contingent liabilities and other risk factors in note 19. The Company has no additional material contingent liabilities to recognise under SII.

D.3.1 Other liabilities

Other Liabilities comprise accruals and cash flows payable under the quota share arrangement. Other liabilities expected to be settled within one year are valued, on the SII balance sheet, at the amount expected to be paid. Non-current accruals and other liabilities are valued at their fair value, and are not adjusted to take account of the impact of changes in the own credit standing of the Company. In valuing such liabilities, the timing and monetary amount of expected outflow of cash or other resources are determined and these projected cash flows discounted.

Deferred income of £771 thousand (*2022: £1,393 thousand*), included within other liabilities under IFRS, is not recognised and therefore valued at £nil in the SII balance sheet.

D.3.2 Assumptions, judgements and uncertainty

No material assumptions or judgements were applied to, nor is any material uncertainty associated with, the recognition and valuation of other liabilities.

D.3.3 Changes made to recognition and valuation bases and estimations during the reporting period

The Company has adopted International Financial Reporting Standard (IFRS) 17 Insurance Contracts (IFRS 17) from 1 January 2023 and comparatives have been retrospectively restated from the transition date of 1 January 2022. The Company has also adopted IFRS 9 Financial Instruments (IFRS 9) from 1 January 2023, which has not resulted in any measurement differences. Further information on the changes to comparative amounts is provided in note 1 of the Company's financial statements.

There were no other changes made to the recognition and valuation bases used or to estimations during the reporting period.

D.4 Alternative Methods of Valuation

The Company has not used any alternative methods of valuation.

D.5 Any Other Information

The Company has no material information to disclose.

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E. Capital Management

In this Chapter

E. Capital Management

The 'Capital Management' section of the report describes the objectives, policies and procedures employed by the Company for managing its Own Funds. The section also covers information on structure and quality of Own Funds and calculation of SCR.

E.1 Own Funds

E.1.1 Management of Own Funds

The Company's capital and risk management objectives are closely interlinked and support earnings growth and dividend policy, whilst also recognising the critical importance of protecting policyholder and other stakeholder interests. The Company's primary objective of managing capital efficiently is to optimise the balance between return and risk, whilst maintaining economic and regulatory capital surplus in accordance with approved risk appetites.

In managing its Own Funds the Company also seeks to:

- Match the profile of its assets and liabilities, taking account of the risks inherent in the business;
- Maintain sufficient, but not excessive, financial strength to support new business growth and satisfy the requirements of its policyholders and its regulator, the PRA;
- Retain financial flexibility by maintaining sufficient liquidity; and
- Allocate capital efficiently, applying it to support value-adding growth and repatriating excess capital to its shareholder through dividends.

Own Funds are monitored via forecasts over a three year planning horizon. A number of stress and scenario tests are used to enable the Company to understand the volatility of its earnings and capital requirement, and therefore manage its capital more efficiently.

There have been no material changes in the objectives, policies or processes employed for managing Own Funds during the year.

E.1.2 Eligible Own Funds

An analysis of the Company's Own Funds by tier is presented in the Own Funds QRT S.23.01.01, (see Appendix F.1.6), and summarised below.

Own Funds **£000s** **As at 31 December**	**Total** **2023**	**Tier 1** **(unrestricted)** 2023	Total 2022	Tier 1 (unrestricted) 2022
Ordinary share capital	**76,500**	**76,500**	**10,000**	**10,000**
Reconciliation reserve	**(60,243)**	**(60,243)**	**6,178**	**6,178**
Total Basic Own Funds	**16,257**	**16,257**	**16,178**	**16,178**

Tiering analysis

The Company's ordinary share capital and reconciliation reserve are available to absorb losses and have the Tier 1 features of permanence and subordination. As the Company's Articles of Association do not contain any restriction on the right of the Company to cancel dividends or other distributions at any time before they are paid, the Company's ordinary share capital is classified as unrestricted Tier 1.

Significant changes in Own Funds during the year

Ordinary share capital increased by £66,500 thousand (2022:£nil) and this capital injection was used to finance the business arrangement detailed in section A.1.2.

The Company's Tier 1 Own Funds of £16,257 thousand (*2022: £16,178 thousand*) increased by £79 thousand during the year.

Reconciliation reserve

The Company's capital comprises ordinary share capital and retained earnings. However, retained earnings are not separately disclosed in Own Funds. They are notionally included in the reconciliation reserve, which reconciles the total excess of assets over liabilities with identifiable capital instruments included in Own Funds.

The table below sets out the constituent parts of the reconciliation reserve:

As at 31 December	**£000s** **2023**	£000s 2022
SII excess of assets over liabilities	16,257	16,178
Ordinary share capital	(76,500)	(10,000)
Reconciliation reserve	(60,243)	6,178

Eligibility of tiered capital

The eligibility of tiered capital, to cover the SCR and MCR depends upon the tiering shown above and a number of quantitative limits. The Company's Own Funds satisfy all limits applicable to the SCR and MCR and therefore the eligibility of the Company's capital to cover the SCR and MCR is unrestricted, as shown in the table below.

As at 31 December	**£000s 2023**	£000s 2022
Total eligible Own Funds to meet the SCR	16,257	16,178
Total eligible Own Funds to meet the MCR	16,257	16,178

The ratio of eligible Own Funds to the SCR and the MCR is detailed below.

As at 31 December	**2023**	2022
Ratio of eligible Own Funds to the SCR	333 %	336 %
Ratio of eligible Own Funds to the MCR	465 %	470 %

E.1.3 Material differences between equity on an IFRS basis and Own Funds

The Company's Own Funds are equal to its excess of assets over liabilities on a SII basis. The excess of £16,257 thousand is £65,833 thousand less than the Company's total equity on an IFRS basis. The following table details the material differences between the excess of assets over liabilities on a SII basis and total equity on an IFRS basis.

As at 31 December 2023	£000s	£000s	**See Section**
Total equity on an IFRS basis		82,090	
Elimination of deferred acquisition costs	—		
Valuation adjustments to reinsurance recoverables	(13,919)		D.1.2
Valuation adjustments to Technical Provisions	(52,685)		D.2.3
Elimination of reinsurers share of deferred acquisition costs	—		
Elimination of deferred income	771		D.3.1
Net deferred tax adjustments	—		D.1.5
		(65,833)	
Excess of assets over liabilities on a SII basis		16,257	

E.1.4 Transitional arrangements and restrictions

The Company's Own Funds are unrestricted and fully transferable.

E.2 Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR)

E.2.1 The amount of the SCR and MCR

The Company's SCR as at 31 December 2023 was £4,876 thousand (*2022: £4,816 thousand*). This is shown in the SCR QRT, S.25.01, see Appendix F.1.7. The final amount of the SCR is subject to supervisory assessment and does not include any regulator-imposed capital add-ons. The Company's MCR as at 31 December 2023 was £3,495 thousand (*2022: £3,445 thousand*). This is shown on the MCR QRT, S.28.01, see Appendix F.1.8.

E.2.2 The composition of the SCR

The Company determines its SCR using SF. An analysis by risk module is presented in the table below. Further detail is shown in the SCR QRT, see Appendix F.1.7.

Diversified SCR by material risk category (per the SCR QRT) **As at 31 December**	£000s **2023**	£000s **2022**
Market risk	1,937	115
Counterparty risk	2,731	3,164
Underwriting risk	67	887
Diversification between risk categories	(986)	(461)
Basic SCR	3,751	3,705
Operational risk	1,125	1,112
Total SCR	4,876	4,816

Each risk module includes the impact of diversification within that module. The diversification benefit presented in the table above of negative £986 thousand (*2022: negative £461 thousand*) therefore only includes the benefit of diversification between risk modules. This has increased in year following the changes in the component risks explained below.

The SCR is broadly unchanged since the previous year-end. The composition of the SCR has changed. Market Risk increased following a change in the underlying portfolio, moving to holding mostly liquidity fund investments. This prompted a review of the way liquidity funds are stressed, which resulted in a look-through approach being used, and increases to the spread and concentration sub-risks. Underwriting risk reduced following a reduction to claims provisions held against claims incurred prior to the start of the 100% quota share reinsurance with AIL. Diversification benefit increased as a result of Market Risk and Counterparty Risk being more equally balanced than at the previous year-end. Operational risk is capped at 30% of the Basic SCR and increases in line with the other risks.

E.2.3 Simplifications, undertaking specific parameters and matching adjustment *(unaudited)*

The Company has not used any simplified calculations, undertaking specific parameters or a matching adjustment in the calculation of its SCR.

E.2.4 MCR calculation

The Company's MCR is calculated by applying prescribed factors to its written premium and its net Best Estimate Liabilities. The MCR is subject to two further constraints; it must lie in the range of 25% to 45% of the Company's SCR and it cannot be less than an absolute minimum of €4.0m, converted at the exchange rate applicable at the end of October preceding the year end. The Company's MCR is the absolute minimum which is £3,495 thousand following translation into GBP (*2022: £3,445 thousand*).

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

The Company does not use this option.

E.4 Differences between the Standard Formula and any Internal Model used

The Company does not use an Internal Model (IM).

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

The Company has complied continuously with both the MCR and the SCR throughout the reporting period.

E.6 Any Other Information

The Company has no other material information to disclose.

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F. Appendices

In this Section

F.0 Cautionary Statement

This announcement contains, and we may make other verbal or written ‘forward-looking statements’ with respect to certain of the Company’s plans and current goals and expectations relating to future financial condition, performance, results, strategic initiatives and objectives (including, without limitation, climate-related plans and goals). Statements containing the words ‘believes’, ‘intends’, ‘expects’, ‘projects’, ‘plans’, ‘will’, ‘seeks’, ‘aims’, ‘may’, ‘could’, ‘outlook’, ‘likely’, ‘target’, ‘goal’, ‘guidance’, ‘trends’, ‘future’, ‘estimates’, ‘potential’ 'objective’, ‘predicts’, ‘ambition’ and ‘anticipates’, and words of similar meaning, are forward-looking. By their nature, all forward-looking statements involve risk and uncertainty. Accordingly, there are or will be important factors that could cause actual results to differ materially from those indicated in these statements.

The Company believes factors that could cause actual results to differ materially from those indicated in forward-looking statements in the announcement include, but are not limited to: the impact of ongoing uncertain conditions in the global financial markets and the national and; international political and economic situation generally (including those arising from the escalation of Russia-Ukraine and Israel-Palestine conflicts into wider regional conflicts); market developments and government actions; the effect of credit spread volatility on the net unrealised value of the investment portfolio; the effect of losses due to defaults by counterparties, including potential sovereign debt defaults or restructurings, on the value of our investments; the impact of changes in short or long-term interest rates and inflation reduce the value or yield of our investment portfolio and impact our asset and liability matching; the impact of changes in equity or property prices on our investment portfolio; fluctuations in currency exchange rates; the effect of market fluctuations on the value of the assets backing reserves; the amount of allowances and impairments taken on our investments; the effect of adverse capital and credit market conditions on our ability to meet liquidity needs and our access to capital; changes in, or restrictions on, our ability to initiate capital management initiatives; changes in or inaccuracy of assumptions in pricing and reserving for insurance business (particularly with regard to mortality and morbidity trends, lapse rates and policy renewal rates), a cyclical downturn of the insurance industry; the impact of natural and man-made catastrophic events (including the longer-term impact of COVID-19) on our business activities and results of operations; the transitional, litigation and physical risks associated with climate change; failure to understand and respond effectively to the risks associated with environmental, social or governance (‘ESG’) factors; our reliance on information and technology and third-party service providers for our operations and systems; the impact of the Company’s risk mitigation strategies proving less effective than anticipated, including the inability of reinsurers to meet obligations or unavailability of reinsurance coverage; increased competition in the UK; changes in valuation methodologies, estimates and assumptions used in the valuation of investment securities; the effect of legal proceedings and regulatory investigations; the impact of operational risks, including inadequate or failed internal and external processes, systems and human error or from external events and malicious acts (including cyber attack and theft, loss or misuse of customer data); risks associated with arrangements with third parties; our reliance on third-party distribution channels to deliver our products; funding risks associated with our participation in defined benefit staff pension schemes; the failure to attract or retain the necessary key personnel; the effect of simplifying our operating structure and activities; the effect of a decline in any of our ratings by rating agencies on our standing among customers, broker-dealers, agents, wholesalers and other distributors of our products and services; changes to our brand and reputation; changes in tax laws and interpretation of existing tax laws in jurisdictions where we conduct business; changes to International Financial Reporting Standards relevant to insurance companies and their interpretation; the inability to protect our intellectual property; the policies, decisions and actions of government or regulatory authorities in the UK, the EU, or elsewhere, including changes to and the implementation of key legislation and regulation (for example, FCA Consumer Duty and Solvency II). For a more detailed description of these risks, uncertainties and other factors, please see the Aviva plc Annual report and accounts.

The Company undertakes no obligation to update the forward-looking statements in this announcement or any other forward-looking statements it may make. Forward-looking statements in this report are current only as of the date on which such statements are made. The climate metrics used in this document should be treated with special caution, as they are more uncertain than, for example, historical financial information and given the wider uncertainty around the evolution and impact of climate change. Climate metrics include estimates of historical emissions and historical climate change and forward-looking climate metrics (such as ambitions, targets, climate scenarios and climate projections and forecasts). Our understanding of climate change and its impact continue to evolve. Accordingly, both historical and forward-looking climate metrics are inherently uncertain and, therefore, less decision-useful than metrics based on historical financial statements.

This Solvency and Financial Condition Report has been published for information only, it is based on our understanding as at 29 April 2025 and does not provide financial or legal advice. Other than as set out in section F.3 (Directors Statement), the Company, its directors, employees, agents or advisers do not accept or assume responsibility to any person to who this document is shown or into whose hands it may come, and any such responsibility or liability is expressly disclaimed.

Appendix F.1.1
S.02.01.02
Balance Sheet
Amounts in 000s

		Solvency II Value
		C0010
Assets		
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	103,409
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	
Equities	R0100	
- Equities - Listed	R0110	
- Equities - Unlisted	R0120	
Bonds	R0130	
- Government Bonds	R0140	
- Corporate Bonds	R0150	
- Structured Notes	R0160	
- Collateralised securities	R0170	
Collective Investments Undertakings	R0180	103,409
Derivatives	R0190	
Deposits other than cash equivalents	R0200	
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans & mortgages	R0230	
- Loans on policies	R0240	
- Loans & mortgages to individuals	R0250	
- Other loans & mortgages	R0260	
Reinsurance recoverables from:	R0270	24,634
- Reinsurance recoverables - Non-life and health similiar to non-life	R0280	20,987
- Reinsurance recoverables - Non-life excluding health	R0290	20,987
- Reinsurance recoverables - Health similar to non-life	R0300	
- Reinsurance recoverables - Life and health similar to life, excluding health and index-linked and unit-linked	R0310	3,647
- Reinsurance recoverables - Health similar to life	R0320	
- Reinsurance recoverables - Life excluding health and index-linked and unit-linked	R0330	3,647
- Reinsurance recoverables - Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance & intermediaries receivables	R0360	
Reinsurance receivables	R0370	6,139
Receivables (trade, not insurance)	R0380	(52)
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	38
Any other assets, not elsewhere shown	R0420	347
Total assets	R0500	134,516

Liabilities		
Technical provisions - Non-life	R0510	33,080
- Technical provisions - Non-life (excluding health)	R0520	33,080
- TP calculated as a whole - Non-life (excluding health)	R0530	
- Best Estimate - Non-life (excluding health)	R0540	32,978
- Risk margin - Non-life (excluding health)	R0550	102
- Technical provisions - Health (similar to non-life)	R0560	
- TP calculated as a whole - Health (similar to non-life)	R0570	
- Best Estimate - Health (similar to non-life)	R0580	
- Risk margin - Health (similar to non-life)	R0590	
Technical provisions - Life (excluding index-linked and unit linked)	R0600	4,051
- Technical provisions - Health (similar to life)	R0610	
- TP calculated as a whole - Health (similar to life)	R0620	
- Best Estimate - Health (similar to life)	R0630	
- Risk margin - Health (similar to life)	R0640	
- Technical provisions - Life (excluding health and index-linked and unit-linked)	R0650	4,051
- TP calculated as a whole - Life (excl health, index-linked and unit-linked)	R0660	
- Best Estimate - Life (excl health, index-linked and unit-linked)	R0670	4,051
- Risk margin - Life (excl health, index-linked and unit-linked)	R0680	
Technical provisions - Index-linked and unit-linked	R0690	
- TP calculated as a whole - Index-linked and unit-linked	R0700	
- Best Estimate - Index-linked and unit-linked	R0710	
- Risk margin - Index-linked and unit-linked	R0720	
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	75
Reinsurance payables	R0830	36,742
Payables (trade, not insurance)	R0840	34,546
Subordinated liabilities	R0850	
- Subordinated liabilities not in BOF	R0860	
- Subordinated liabilities in BOF	R0870	
Any other liabilities, not elsewhere shown	R0880	9,764
Total liabilities	R0900	118,259

Excess of assets over liabilities	R1000	16,257

Appendix F.1.2.1
S.05.01.02
Premiums, claims and expenses by line of business
Amounts in 000s

		Line of Business for: life insurance obligations						Life reinsurance obligations		
		Health [accepted non-proportional reinsurance]	Insurance with profit participation	Unit-linked or index-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance	Health reinsurance	Life reinsurance	Total
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Premiums written										
Gross - Direct Business	R1410									
Reinsurers' share	R1420									
Net	R1500									
Premiums earned										
Gross - Direct Business	R1510									
Reinsurers' share	R1520									
Net	R1600									
Claims incurred										
Gross - Direct Business	R1610						(410)			(410)
Reinsurers' share	R1620						(77)			(77)
Net	R1700						(333)			(333)
Changes in other technical provisions										
Gross - Direct Business	R1710									
Reinsurers' share	R1720									
Net	R1800									
Expenses incurred	R1900									
Other expenses	R2500									
Total expenses	R2600									

Appendix F.1.2.2
S.05.01.02
Premiums, claims and expenses by line of business
Amounts in 000s

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)											
		Medical expense insurance [direct business]	Income protection insurance [direct business]	Workers' compensation insurance [direct business]	Motor vehicle liability insurance [direct business]	Other motor insurance [direct business]	Marine, aviation and transport insurance [direct business]	Fire and other damage to property insurance [direct business]	General liability insurance [direct business]	Credit and suretyship insurance [direct business]	Legal expenses insurance [direct business]	Assistance [direct business]	Miscellaneous financial loss [direct business]
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120
Premiums written													
Gross - Direct Business	R0110							95,234	2,945				
Gross - Proportional reinsurance accepted	R0120												
Gross - Non-proportional reinsurance accepted	R0130												
Reinsurers' share	R0140							91,235	2,822				
Net	R0200							4,000	124				
Premiums earned													
Gross - Direct Business	R0210							98,769	3,055				
Gross - Proportional reinsurance accepted	R0220												
Gross - Non-proportional reinsurance accepted	R0230												
Reinsurers' share	R0240							94,621	2,926				
Net	R0300							4,148	128				
Claims incurred													
Gross - Direct Business	R0310				970			66,886	2,064				
Gross - Proportional reinsurance accepted	R0320												
Gross - Non-proportional reinsurance accepted	R0330												
Reinsurers' share	R0340				2,597			64,037	1,976				
Net	R0400				(1,627)			2,849	88				
Changes in other technical provisions													
Gross - Direct Business	R0410												
Gross - Proportional reinsurance accepted	R0420												
Gross - Non-proportional reinsurance accepted	R0430												
Reinsurers' share	R0440												
Net	R0500												
Expenses incurred	R0550							759	23				
Other expenses	R1200												
Total expenses	R1300												

		Line of Business for: accepted non proportional reinsurance				Total
		Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0130	C0140	C0150	C0160	C0200
Premiums written						
Gross - Direct Business	R0110					98,180
Gross - Proportional reinsurance accepted	R0120					
Gross - Non-proportional reinsurance accepted	R0130					
Reinsurers' share	R0140					94,056
Net	R0200					4,124
Premiums earned						
Gross - Direct Business	R0210					101,824
Gross - Proportional reinsurance accepted	R0220					
Gross - Non-proportional reinsurance accepted	R0230					
Reinsurers' share	R0240					97,548
Net	R0300					4,277
Claims incurred						
Gross - Direct Business	R0310					69,920
Gross - Proportional reinsurance accepted	R0320					
Gross - Non-proportional reinsurance accepted	R0330					
Reinsurers' share	R0340					68,610
Net	R0400					1,310
Changes in other technical provisions						
Gross - Direct Business	R0410					
Gross - Proportional reinsurance accepted	R0420					
Gross - Non-proportional reinsurance accepted	R0430					
Reinsurers' share	R0440					
Net	R0500					
Expenses incurred	R0550					782
Other expenses	R1200					
Total expenses	R1300					782

Appendix F.1.3.1
S.12.01.02
Life and Health SLT Technical Provisions
Amounts in 000s

		Insurance with profit participation	Unit-linked or index-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligations other	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)
				Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees			
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150
Technical provisions calculated as a whole	R0010										
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0020										
Technical provisions calculated as a sum of BE and RM											
Best Estimate											
Gross Best Estimate	R0030								4,051		4,051
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0080								3,647		3,647
Best estimate minus recoverables from reinsurance and SPV - Total	R0090								404		404
Risk Margin	R0100								—		—
Amount of the transitional on Technical Provisions											
Technical Provisions calculated as a whole	R0110										
Best estimate	R0120										
Risk margin	R0130										
Technical provisions - Total	R0200								4,051		4,051

		Health [accepted non-proportional reinsurance]			Annuities stemming from non-life insurance contracts and relating to health insurance obli	Health reinsurance	Total (Health similar to life insurance)
			Contracts without options and guarantees	Contracts with options or guarantees			
		C0160	C0170	C0180	C0190	C0200	C0210
Technical provisions calculated as a whole	R0010						
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0020						
Technical provisions calculated as a sum of BE and RM							
Best Estimate							
Gross Best Estimate	R0030						
Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default	R0080						
Best estimate minus recoverables from reinsurance and SPV - Total	R0090						
Risk Margin	R0100						
Amount of the transitional on Technical Provisions							
Technical Provisions calculated as a whole	R0110						
Best estimate	R0120						
Risk margin	R0130						
Technical provisions - Total	R0200						

Appendix F.1.3.2
S.17.01.02
Non-Life Technical Provisions
Amounts in 000s

		Direct business and accepted proportional reinsurance											
		Medical expense insurance [direct business]	Income protection insurance [direct business]	Workers' compensation insurance [direct business]	Motor vehicle liability insurance [direct business]	Other motor insurance [direct business]	Marine, aviation and transport insurance [direct business]	Fire and other damage to property insurance [direct business]	General liability insurance [direct business]	Credit and suretyship insurance [direct business]	Legal expenses insurance [direct business]	Assistance [direct business]	Miscellaneous financial loss [direct business]
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130
Technical provisions calculated as a whole	R0010												
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050												
Technical provisions calculated as a sum of BE and RM													
Best estimate													
Premium provisions													
Gross	R0060							-5,202	-251				
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140							-7,877	-251				
Net Best Estimate of Premium Provisions	R0150							2,675					
Claims provisions													
Gross	R0160				791	-2		36,302	1,341				
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240				791	-2		26,985	1,341				
Net Best Estimate of Claims Provisions	R0250							9,317					
Total Best estimate - Gross	R0260				791	-2		31,100	1,090				
Total Best estimate - Net	R0270							11,992					
Risk margin	R0280				—	—		100	1				
Amount of the transitional on Technical Provisions													
Technical Provisions calculated as a whole	R0290												
Best estimate	R0300												
Risk margin	R0310												
Technical provisions - Total													
Technical provisions - Total	R0320				791	-2		31,200	1,091				
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - Total	R0330				791	-2		19,108	1,090				
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - Total	R0340				—	—		12,092	1				

		Accepted non-proportional reinsurance				
		Health [accepted non-proportional reinsurance]	Casualty [accepted non-proportional reinsurance]	Marine, aviation, transport [accepted non-proportional reinsurance]	Property [accepted non-proportional reinsurance]	Total Non-Life obligation
		C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010					
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050					
Technical provisions calculated as a sum of BE and RM						
Best estimate						
Premium provisions						
Gross	R0060					-5,453
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140					-8,128
Net Best Estimate of Premium Provisions	R0150					2,675
Claims provisions						
Gross	R0160					38,432
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240					29,115
Net Best Estimate of Claims Provisions	R0250					9,317
Total Best estimate - Gross	R0260					32,978
Total Best estimate - Net	R0270					11,992
Risk margin	R0280					102
Amount of the transitional on Technical Provisions						
Technical Provisions calculated as a whole	R0290					
Best estimate	R0300					
Risk margin	R0310					
Technical provisions - Total						
Technical provisions - Total	R0320					33,080
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - Total	R0330					20,987
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - Total	R0340					12,093

Appendix F.1.4
S.19.01.21
Non-Life Insurance Claims Information
Amounts in 000s

Total Non-Life Business

Accident year / Underwriting year | Z0020 | AY |

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

		Development Year 0	1	2	3	4	5	6	7	8	9	10&+		In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
Prior	R0100											1,216	R0100	1,216	1,216
R0160	R0160	50,779	21,227	2,160	1,547	597	(100)	(29)	209	228	118		R0160	118	76,737
R0170	R0170	39,115	20,306	2,461	281	254	109	92	168	28			R0170	28	62,814
R0180	R0180	37,651	16,481	1,423	456	558	32	581	534				R0180	534	57,716
R0190	R0190	35,587	14,258	1,475	377	670	264	452					R0190	452	53,082
R0200	R0200	41,305	17,623	2,506	1,461	616	788						R0200	788	64,300
R0210	R0210	32,162	11,998	1,795	1,013	447							R0210	447	47,417
R0220	R0220	27,800	11,882	2,156	1,420								R0220	1,420	43,258
R0230	R0230	21,397	14,259	1,583									R0230	1,583	37,240
R0240	R0240	23,106	21,458										R0240	21,458	44,563
R0250	R0250	19,032											R0250	19,032	19,032
													Total R0260	47,076	507,374

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

		Development Year 0	1	2	3	4	5	6	7	8	9	10&+		Year end (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		C0360
Prior	R0100											2,283	R0100	1,711
R0160	R0160			1,730	745	239	(39)	137	117	70	48		R0160	46
R0170	R0170		3,680	1,017	606	782	141	191	160	52			R0170	52
R0180	R0180	12,953	3,533	1,441	924	435	455	622	510				R0180	479
R0190	R0190	12,982	3,355	1,029	918	809	670	397					R0190	369
R0200	R0200	16,926	3,884	2,543	2,100	1,433	1,243						R0200	1,145
R0210	R0210	15,041	3,093	1,567	1,303	1,517							R0210	1,391
R0220	R0220	12,843	4,409	2,543	2,473								R0220	2,245
R0230	R0230	10,122	3,948	2,212									R0230	2,015
R0240	R0240	26,418	11,833										R0240	10,918
R0250	R0250	19,132											R0250	18,061
													Total R0260	38,432

Appendix F.1.5
S.22.01.21
Impact of long term guarantees and transitional measures
Amounts in 000s

		Amount with LG measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical Provisions	R0010	37,132			567	
Basic Own Funds	R0020	16,257				
Eligible own funds to meet Solvency Capital Requirement	R0050	16,257				
Solvency Capital Requirement	R0090	4,876				
Eligible own funds to meet Minimum Capital Requirement	R01 00	16,257				
Minimum Capital Requirement	R0110	3,495				

Appendix F.1.6
S.23.01.01
Own Funds
Amounts in 000s

		Total	Tier 1	Tier 1	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	76,500	76,500			
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	(60,243)	(60,243)			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
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					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	16,257	16,257			
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 under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds - Solo	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	16,257	16,257			
Total available own funds to meet the MCR	R0510	16,257	16,257			
Total eligible own funds to meet the SCR	R0540	16,257	16,257			
Total eligible own funds to meet the MCR	R0550	16,257	16,257			
SCR	R0580	4,876				
MCR	R0600	3,495				
Ratio of eligible own funds to SCR	R0620	3.3341				
Ratio of eligible own funds to MCR	R0640	4.6515				

		C0060
Reconciliation Reserve		
Excess of assets over liabilities	R0700	16,257
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	76,500
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	(60,243)
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	
Total expected profits included in future premiums (EPIFP)	R0790	

Appendix F.1.7
S.25.01.21
Solvency Capital Requirement - For undertakings using the standard formula
Amounts in 000s

Component Description		Gross Solvency Capital Requirement	USP	Simplifications	LAC DT
C0020		C0030	C0090	C0120	C0130
Market Risk	R0010	1,937		None	None
Counterparty Risk	R0020	2,731			
Life underwriting risk	R0030	32	None	None	None
Health underwriting risk	R0040		None	None	None
Non-life underwriting risk	R0050	35	None	None	None
Diversification	R0060	(986)			
Intangible asset risk	R0070				
Basic Solvency Capital Requirement	R0100				

		C0100
Calculation of Solvency Capital Requirement		
Operational risk	R0130	1,125
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	4,876
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency Capital Requirement excluding capital add-on		4,876
Capital add-ons already set	R0200	
Solvency capital requirement for undertakings under consolidated method	R0210	
Other information on SCR	R0220	
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

		Approach based on average tax rate
Approach to tax rate		C0109
Approach based on average tax rate	R0590	

Calculation of loss absorbing capacity of deferred taxes

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

Appendix F.1.8
S.28.01.01
Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity
Amounts in 000s
Linear formula component for non-life insurance and reinsurance obligations

		C0010
MCRNL Result	R0010	1,437

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020		
Income protection insurance and proportional reinsurance	R0030		
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050		
Other motor insurance and proportional reinsurance	R0060		
Marine, aviation and transport insurance and proportional reinsurance	R0070		
Fire and other damage to property insurance and proportional reinsurance	R0080	11,992	4,124
General liability insurance and proportional reinsurance	R0090		
Credit and suretyship insurance and proportional reinsurance	R01 00		
Legal expenses insurance and proportional reinsurance	R0110		
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130		
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150		
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170		

Linear formula component for life insurance and reinsurance obligations

		C0040
MCRL Result	R0200	8

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - Guaranteed benefits	R0210		
Obligations with profit participation - Future discretionary benefits	R0220		
Index-linked and unit-linked insurance obligations	R0230		
Other life (re)insurance and health (re)insurance obligations	R0240	404	
Total capital at risk for all life (re)insurance obligations	R0250		

Overall MCR calculation

		C0070
Linear MCR	R0300	1,445
SCR	R0310	4,876
MCR cap	R0320	2,194
MCR floor	R0330	1,219
Combined MCR	R0340	1,445
Absolute floor of the MCR	R0350	3,495

		C0070
Minimum Capital Requirement	R0400	3,495

F.2 Glossary of Abbreviations and Definitions

A glossary explaining the key terms used in this report is available on www.aviva.com/glossary.

F.3 Directors' Statement

We acknowledge our responsibility for preparing the Solvency and Financial Condition Report of Gresham Insurance Company Limited 31 December 2023 in all material respects in accordance with the PRA Rules and the Solvency II Regulations.

The Board is satisfied that to the best of its knowledge and belief:

(a) throughout the financial year to 31 December 2023, the Company has complied in all material respects with the requirements of the PRA rules and Solvency II Regulations as applicable to the Company; and

(b) it is reasonable to believe that in respect of the period from 31 December 2023 to the date of the publication of the SFCR, the Company has continued so to comply and that it will continue so to comply for the remainder of the financial year to 31 December 2024.

J C Holliday

Director

1 May 2025

F.4 External Audit

The PRA issued Policy Statement PS25/18 in October 2018 which removes the external audit requirement for the SFCR of certain small Solvency II firms. As the Company meets the criteria of a small Solvency II firm there is no requirement for this SFCR to be audited. Consequently, all qualitative and quantitative disclosure in this document is unaudited.