

The Ocean Marine Insurance Company Limited

Solvency and Financial Condition Report

Year ended 31 December 2025

Contents

A	Summary Business and Performance	3
B	System of Governance	7
C	Risk Profile	14
D	Valuation for Solvency Purposes	20
E	Capital Management	26
F	Appendices	33
F.0	Cautionary Statement	34
F.1	Public Disclosure Quantitative Reporting Templates	34
F.1.1	<i>IR.02.01.02.01 Balance Sheet</i>	35
F.1.2	<i>IR.05.02.01 Non-life Premiums ,claims and expenses by country</i>	35
F.1.3	<i>IR.05.04.02.01 Non-life Premiums, claims and expenses by line of business</i>	36
F.1.4.	<i>IR.17.01.2 Non-life technical provisions</i>	37
F.1.5	<i>IR.19.01.21 Non-life life claims information</i>	39
F.1.6	<i>IR.22.01.21.01 Impact of long term guarantees measures and transitionals</i>	40
F.1.7	<i>IR.23.01.01.01 Own Funds</i>	41
F.1.8	<i>IR.25.04.21.01 Solvency Capital Requirement</i>	42
F.1.9	<i>IR.28.01.01 Minimum Capital Requirement</i>	43
F.2	Glossary of Abbreviations and Definitions	45
F.3	Directors' Statement	46
F.4	Auditors' Report	47

The Ocean Marine Insurance Company Limited

Solvency and Financial Condition Report

2025

Summary

The purpose of the Solvency and Financial Condition Report (SFCR) is to provide information required by the Solvency II (UK) regulatory framework and in particular the capital position of The Ocean Marine Insurance Company Limited (the Company) at 31 December 2025.

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.

In the United Kingdom (UK) the final Prudential Regulation Authority (PRA) rules for Solvency UK became effective from 31 December 2024, completing the review by the PRA of Solvency II and replacing assimilated law inherited from the European Union. 'Solvency UK' has been referred to in this document except for where referring to our Solvency II results, where we refer to 'Solvency II' in line with the current PRA guidance.

Business and Performance

The Company is a limited company registered in England and Wales and member of the Aviva plc group of companies. The principal activity of the Company during the year continued to be the settlement of its existing general insurance liabilities, with the Company having ceased to accept business in the London Market in 1995 and is currently not writing (nor projected to write) new business.

Under a Part VII transfer in 2011, policies from a number of other Aviva entities were transferred into the Company, all of which incepted prior to 2001. All business is wholly reinsured through reinsurance agreements entered into with National Indemnity Company (NICO) in 2000. The Company has an Adverse Reserve Deterioration (ARD) agreement with its parent company, Aviva Insurance Limited (AIL). This agreement provides an extra £1bn of reinsurance cover to protect against circumstances in which the reinsurance with NICO is exhausted or otherwise fails to satisfy claims. Together these arrangements provide substantial protection in excess of current gross liabilities.

The Company made an IFRS profit before tax of £112 thousand (2024: profit £570 thousand). This comprises an underwriting loss of £(159) thousand (2024: £150 thousand loss) net investment income of £271 thousand (2024: £720 thousand) and other activities expense of £nil thousand (2024: £0 income).

There have been no 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. Key features of the Company's System of Governance are as follows:

- The roles and responsibilities of the Board are well defined;
- The Company's Board has delegated responsibilities to management within the Aviva Group 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.

There have been no other material changes in the Company's system of governance during the year.

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

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 absolute liquidity coverage relative to pre-defined appetites and the quantum of certain liquid assets.

The Company's exposure to underwriting risk, being the management of claims and adequacy of reserves, is mitigated by its ARD arrangement with National Indemnity Company.

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 Solvency II Balance Sheet according to the Solvency II regulations. The basis of the Solvency II 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 Solvency II is equal to the sum of a Best Estimate Liability and a Risk Margin.

At 31 December 2025, the Company's excess of assets over liabilities was £69,025 thousand (2024: £68,860 thousand) on a Solvency II basis which is £547 thousand (2024: £600 thousand) lower than the value under IFRS.

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 Solvency II bases of valuation.

Capital Management

The Company manages its Own Funds in conjunction with solvency capital requirements. In the calculation of the SCR, the Company has chosen to implement an IM to calculate solvency capital requirements for its business.

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 2025, the total eligible Own Funds to meet the SCR was £69,025 thousand (2024: £68,860 thousand) all of which was represented by unrestricted tier 1 capital.

The Company's SCR, at 31 December 2025, was £6,965 thousand (2024: £6,907 thousand). The Company's MCR, at 31 December 2025, was £3,500 thousand (2024: £3,500 thousand). The overall surplus position, as at 31 December 2025 against the SCR, was £62,060 thousand (2024: £61,952 thousand) which translates to a regulatory cover ratio of 991% (2024: 997%). The SCR includes the impact of diversification between the risk categories. At 31 December 2025, there is negative diversification benefit between counterparty and operational risks (both of which are highly skewed) which increased relative to the previous year. Following a review of the Ocean Marine methodology, the AIL receivable is now stressed in its entirety which explains the majority of the increase in the SCR.

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 IM.

The Ocean Marine Insurance Company Limited

Solvency and Financial Condition Report

2025

A. Business and Performance

In this Chapter

- A.1 Business and Performance
- A.2 Underwriting Performance
- A.3 Investment Performance
- A.4 Performance of Other Activities
- A.5 Any Other Information

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

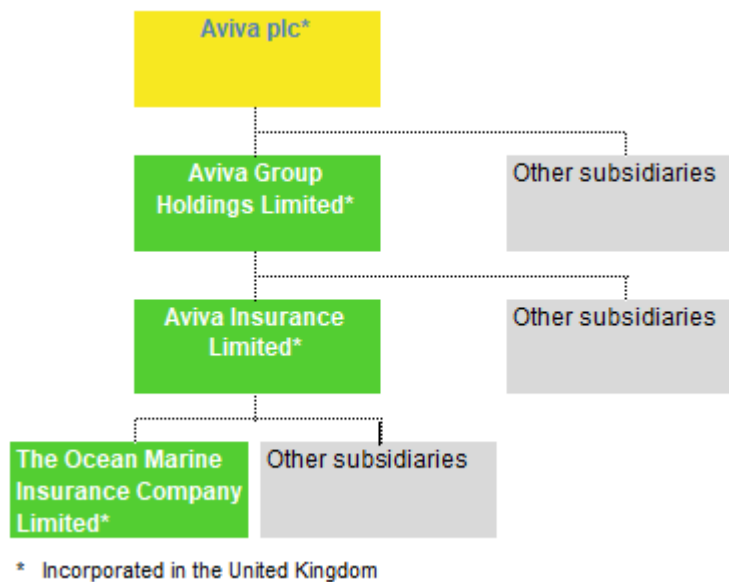
The PRA has issued the company a waiver to exempt the SFCR from the external audit requirements in the PRA handbook. Consequently, all qualitative and quantitative disclosure in this document is unaudited.

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 2025:



The Ocean Marine Insurance Company Limited is a wholly owned 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 principal activity of the Company during the year continued to be the settlement of its existing general insurance liabilities, with the Company having ceased to accept business in the London Market in 1995 and is currently not writing (nor projected to write) new business. All business is wholly reinsured through reinsurance agreements entered into with NICO in 2000.

The Company has an ARD agreement with its parent company, AIL. This agreement provides an extra £1bn of reinsurance cover to protect against circumstances in which the reinsurance with NICO is exhausted or otherwise fails to satisfy claims. Together these arrangements provide substantial protection in excess of current gross liabilities.

The Company continues to maintain strong solvency levels and expects to continue to meet its capital requirements.

A.2 Underwriting Performance

The Company made an IFRS profit before tax of £112 thousand (2024: profit £570 thousand). This comprises an underwriting loss of £159 thousand (2024: £150 thousand loss), net investment income of £271 thousand (2024: £720 thousand) and other activities expense of £nil thousand (2022: £0 thousand income), as shown in the table below.

Year ended 31 December	£000s 2025	£000s 2025	£000s 2024	£000s 2024
Profit for the year before tax		112		570
Less: Net investment income (see A.3)		(271)		(720)
Add back:				
Unwind of discounting on incurred claims	—		—	
Changes in economic assumptions for claims provisions	—		—	
Performance of other activities (see A.4)		—		—
Underwriting profit		(159)		(150)

Quantification of premiums, claims and expenses, analysed by Solvency II lines of business, is provided in QRT IR.05.04 (see Appendix F.1.2.2). This QRT has been prepared in accordance with the definitions and formats prescribed under Solvency II.

A summary of the information provided in the premium, claims and expenses QRT IR.05.04, analysed by Solvency II lines of business, is provided in the table below.

£000s	Marine, aviation and transport insurance	General liability insurance	Fire and other damage to property	Non-Prop Reinsurance	Total
Year ended 31 December 2025					
Premium written					
Gross written premium	—	9	—	—	9
Claims incurred					
Gross - Direct Business	224	7,842	—	—	8,067
Gross - Proportional reinsurance accepted	—	560	—	—	560
Gross - Non-proportional reinsurance accepted	—	—	—	2,577	2,577
Net	2	71	—	22	95
Expenses incurred					(144)
Year ended 31 December 2024					
Premium written					
Gross written premium	—	10	—	—	10
Claims incurred					
Gross - Direct Business	122	3,805	—	—	3,927
Gross - Proportional reinsurance accepted	10	264	—	—	274
Gross - Non-proportional reinsurance accepted	—	—	—	1,254	1,254
Net	—	93	—	—	93
Expenses incurred	—	—	—	—	(208)

The Company's net claims incurred in the year are £95 thousand (2024: £93 thousand) due to the reinsurance arrangements. Gross claims incurred in the year of £11,204 thousand (2024: £5,455 thousand expense) relate to movements on actuarial estimates of claims provisions and paid claims.

A.3 Investment Performance

A.3.1 Measurement of investment performance

Net investment income, as shown in the Company's financial statements, is used as the measure to report the Company's investment performance.

Net investment income £000s	2025	2024
Interest income	670	756
Realised gains/(losses)	(355)	80
Other	(44)	(116)
	271	720

Investment income is primarily made up of interest income of £670 thousand (2024: £756 thousand) and foreign exchange losses of £355 thousand (2024: gains £80 thousand).

A.4 Performance of Other Activities

A.4.1 Other income and expense

As described in section A.2, 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 summarises the income of *£nil thousand* (2024: *£0 thousand loss*) 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 and changes in economic assumptions for claims provisions.

A.5 Any Other Information

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

The Ocean Marine Insurance Company Limited

Solvency and Financial Condition Report 2025

B. System of Governance

In this Chapter

- B.1 General Information on the System of Governance
- B.2 Fit and Proper Policy
- B.3 Risk Management System including the Own Risk and Solvency Assessment
- B.4 Internal Control System
- B.5 Internal Audit Function
- B.6 Actuarial Function
- B.7 Outsourcing
- B.8 Any Other Information

B. System of Governance

This section of the report sets out information regarding the 'System of Governance' in place within the Company. There have been no material changes in the system of governance during the year.

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 Management, Compliance, Internal Audit and Actuarial Functions) are also provided. Other components of the System of Governance are also outlined, including, but not limited to, the risk management system and internal control systems implemented across the business.

B.1 General Information on the System of Governance

B.1.1 Overview of the Board structure and systems of governance

The Company's Board is responsible for promoting the long-term success of the Company and for setting its strategy. It is responsible for setting the Company's risk appetites and ensuring that there is an appropriate system of risk governance in place. 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 within the Group 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 organises 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 groupwide (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 and the maintenance and ongoing development of a robust control framework and environment in their areas of responsibility. The first line of defence includes the Actuarial key control function. The Actuarial Function is accountable for actuarial methodology, reporting on the adequacy of reserves, including on the appropriateness of the underlying methodologies, models and assumptions. It is also responsible for the adequacy of reserves and capital requirements and provides an opinion on reinsurance and underwriting arrangements.

The second line (Risk Function)

The Risk Function comprises the key functions of Risk Management and Compliance.

- The Risk Management Function is responsible for the design and objective oversight of the risk management framework and systems implementation, and the design, implementation and independent validation of the Company's Internal Model (IM). It is also responsible for the Model Risk Business Standard governing all material models. The Risk Management Function reports to the Board on material risks identified, together with any other specific areas of risk requested by the Board, and assists the Board and Management in the effective operation of the risk management system through, among other things, the provision of specialist analysis and quality reviews, an aggregated view of the risk profile, and an assessment of the key risk associated with the business's strategy and key decisions.
- The Compliance Function supports and advises the business on the identification, measurement and management of its regulatory and conduct risks and is accountable for monitoring and reporting on the Company's compliance risk profile.

The third line (Internal Audit)

The Internal Audit Function is independent of the first and second lines of defence. Internal Audit is responsible for assessing and reporting on the effectiveness of the design and operation of the framework of internal controls, which enables risk to be assessed and managed appropriately. The assessment on the robustness of the RMF and the appropriateness and effectiveness of internal control is provided by Internal Audit to the Company's 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, Internal Audit and Actuarial Functions respectively, and how their independence is ensured.

B.1.2 Assessment of effectiveness

An assessment of the effectiveness of the Company's governance, internal control and risk management systems was conducted at the end of 2025, by the parent company, but including consideration of the Company. This included an attestation by the parent company's CEO. Key operational risks and any control weaknesses or non-compliance with the Company's risk policies and business standards or local delegations of authority are highlighted as part of this process. The parent company's Chief Risk Officer (CRO) provided an independent opinion on the parent company CEO's attestation which confirms accuracy of the CEO's declaration and noted no additional qualifications or weaknesses.

B.1.3 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 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.

The directors of the Company receive no remuneration from the Company.

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 2025.

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

The Company has an ARD agreement with its parent company, AIL. This agreement provides an extra £1bn (2024: £1bn) of reinsurance cover to protect against circumstances in which the Company's reinsurance with NICO is exhausted or otherwise fails to satisfy claims. The Company also has receivables of £51m (2024: £51m) from its parent company, which are not secured and are not subject to guarantees.

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 Description of specific requirements concerning skills and knowledge

For persons responsible for running the undertaking or responsible for key functions, subject to regulatory approval/notification, an assessment of fitness and propriety must consider their allocated responsibilities and skills and experience across a skills matrix which covers the following areas as appropriate:

- Insurance and financial markets;
- Business strategy and business models;
- System of governance;
- Financial and actuarial analysis where applicable to the role; and
- Regulatory framework and requirements.

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 Description of policies for assessing fitness and propriety

The Group and the Company has policies in place to ensure that individuals holding senior roles within the Senior Manager and Certificate Regime (SMCR) are "fit" and "proper" in line with the PRA and FCA requirements. The regulators have regard to a number of factors when assessing fitness and propriety and expect firms to have regard to the same factors of: honesty, integrity and reputation, competence and capability and financial soundness. Assessment of fitness and propriety takes place at recruitment and is reassessed periodically thereafter.

A policy to apply a minimum set of basic screening requirements has been agreed and implemented for the recruitment activity for all staff. Additional enhanced screening requirements and ongoing fit and proper assessments are also applied for individuals who are subject to the FCA and PRA senior manager and certification regimes.

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

B.3.1 Overall 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 shareholders, 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 system of governance, risk management processes and Risk Appetite Framework (RAF) and is owned by the Company's Board. It establishes the principles and fundamental statements by which the Company Identifies, Measures, Manages, Monitors and Reports risk (IMMMR).

The Company's RAF outlines the risks that the Company selects and manages in pursuit of return, the risks the Company accepts and retains 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 risk 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 relevant management committees.
- Risk limits: which 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 which set out the risk strategy, appetite for risk and the expectations in respect of the management of risk. Compliance with these policies and standards is confirmed annually.

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 to identify key organisational current and emerging risks. A bottom up risk assessment focuses on risks which are connected to our operational processes, managed through Risk and Control Self-Assessment (RCSA) processes which are 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 (where one risk factor is assumed to vary) and scenario (where combinations of risk factors are assumed to vary) tests are undertaken to evaluate their impact on the business and the management actions available to respond to the conditions envisaged.

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.

The Board is responsible for setting the Company's risk preferences, risk appetites, and monitoring the establishment and operation of prudent and effective controls in order to assess and manage the risks associated with the Company's operations. Risk appetites are set for solvency, liquidity, operational, climate and conduct risk.

The Company's position against its risk appetites is monitored and would be escalated to the Board where appropriate. Long-term sustainability depends upon the protection of franchise value and good customer relationships. As such, the Company has no appetite for a 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.

B.3.2 Risk Function

The Risk Function (Risk Management and Compliance) 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. A further responsibility is to support the Board and management to ensure the effective operation of the RMF through 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 Company's strategy and other key decisions.

The Company's CRO reports to the Group CRO and has a dotted reporting line to the parent company CEO.

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 management accountability for the Risk Function and is responsible for prudential regulatory risk management.

Prudential regulatory 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 provides a continuous and forward-looking assessment of short-term and long-term risks and underpins the consideration of risk and capital implications in key decisions, particularly strategy setting and business planning.

The ORSA is a dynamic process, the outcomes of which are reported to management and the Board throughout the year. It comprises a number of elements of the RMF which are embedded in the Company through the requirements of supporting risk policies and business standards. In combination, these elements create a holistic overview of the risks that may impact the Company and which should be taken into account by management in day-to-day decision making. 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 scenarios).

Consistent with the "three lines of defence model", the parent company CEO and direct reports are responsible for the majority of the underlying ORSA processes set out above. The Risk Function is responsible for the design of the RMF, including, the ORSA Policy and annual ORSA Report, as well as specifically the top-down risk assessment process and Independent Model Validation.

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 risks and controls remain up-to-date. Accordingly, the occurrence of any or all of the following events are indicators of the need to consider an out-of-cycle ORSA Report:

- A material impact on the Company's Own Funds or diversified SCR;
- The invocation of the 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.

The Board has decided that the solvency risk appetite should be expressed as a fixed capital buffer above the Solvency UK SCR to ensure appropriate protection of policyholders noting the long-term risks to which the Company is exposed.

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 Internal Model (IM).

B.3.4 Governance over the Internal Model (IM)

The Solvency UK Model and Data Governance Business Standards and associated guidance, manual, logs and reports are part of the overall RMF, as well as the Internal Model Independent Validation (IMIV) Business Standard. These ensure that the Company operates in accordance with Solvency UK requirements within a controlled environment when developing IM methodologies or assumptions and when running processes and systems.

The Model Governance business standard sets out the minimum business controls and objectives to demonstrate that the IM remains fit for purpose (including clear roles and responsibilities, model governance, weakness and limitation management, results validation etc.) and has not materially changed during the reporting period. The Data Governance business standard details the relevant business controls and objectives to ensure completeness, accuracy, appropriateness, and consistency of the data supporting the internal model results production. The IMIV business standard articulates the minimum requirements that are necessary to independently validate that the IM is fit for purpose and is compliant with regulatory requirements. These standards are key elements of the Group's and Company's governance framework.

The Board is responsible for approving any material IM changes before submission to the PRA for approval.

The Company's CRO is the ultimate owner of the IM, providing assurance to the Board via an annual attestation and annual ORSA report that the IM remains compliant with the Solvency UK Capital Requirements.

In practice, the day-to-day responsibilities to run and maintain the model (but not the IMIV) is delegated to the Chief Actuary who confirms to the Board that the IM adequately reflects the Company's risk profile, is accurate and works effectively and is appropriate for use on an ongoing basis.

An IMIV is conducted (as described further below) and the parent company's Enterprise Risk Director provides an opinion to the Board as to whether the IM materially complies with the relevant Solvency UK requirements, reflects the Company's risk profile, taking into account the Solvency UK requirements, and is fit for purpose for both calculating the regulatory SCR and for wider use of the model.

This supports the Board to be able to conclude whether the IM is fit for purpose while also ensuring it is used to provide information for important strategic and business decisions; capital management; business planning; and risk mitigation.

There has been no material change to the governance of the IM during 2025.

Validation processes

The Company's IM is validated, in line with the IMIV Business Standard, by testing the individual calibrations and methodologies that are input into the model and the results that are output from the model. The results validation tests comprise both mathematically defined tests and those based on qualitative judgement, to ensure that the model and its components are both accurate and reflect management opinion. The results validation tests are assessed against criteria set by the Actuarial Function and are reviewed by the Actuarial Function, as well as the IMIV team, with the results made available to the Board.

B.4 Internal Control System

B.4.1 Description of the internal control system

Internal controls facilitate effective and efficient business operations, the development of robust and reliable internal reporting and compliance with laws and regulations.

The Company's principles for ensuring effective internal control are set out in Risk Policies and Business Standards that set the global objectives and global controls to be applied across the Aviva Group, as well as the RMF and, in particular, the Operational Risk and Control Management (ORCM) Framework. These core risk documents set out mandatory business requirements as these relate to risk management and key controls. 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 for 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 the Company's exposure to regulatory risk and provide advice, guidance and challenge to the first line of defence in their management of this risk. The Compliance Function is an integral part of the RMF, constitutes a key part of the Company's corporate governance, including helping the Company to maintain healthy relationships with the FCA, PRA 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 conduct regulatory risk management 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 complete their work, where appropriate.

The General Counsel is responsible for monitoring of legal developments.

B.5 Internal Audit Function

The parent company's Internal Audit Function (of which the Company is the part) is led by the Chief Audit Officer who reports directly to the Group Chief Audit Officer and to the Chairman of the parent company's 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 parent company's 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

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 is also the Company's CEO), who reports to the parent company 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

B.7.1 – Outsourced functions and activities

The Company receives a wide range of services from within the Group. Claims handling activities are outsourced to companies outside the Group.

B.7.2 – Material intra-group outsourcing arrangements

The Aviva Procurement and Outsourcing Business Standard contains information on the Company's outsourcing policy, setting out the relevant responsibilities, objectives, processes, and monitoring arrangements to be applied in cases of outsourcing, all of which shall be consistent with the overall business strategy. The Business Standard applies equally to any externally or internally (intra-group) outsourcing and non-outsourcing (third-party arrangements that do not meet the definition of outsourcing i.e. services that are not insurance-related operational functions) 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, good customer outcomes are being delivered, 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 outsourcing landscape document to be produced annually which captures details of all outsourced operational functions and activities.

The Business Standard applies to all staff involved in supplier 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
- Contract and supplier management: risk-based approach to management of supply contracts including operational resilience.

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.

Jurisdiction of service providers

Services provided from within the Group are carried out in the UK. Claims handling is carried out in the UK and overseas, most notably in the United States.

B.8 Any Other Information

The Company CRO appointment was formally approved on 16 May 2025.

The Ocean Marine Insurance Company Limited

Solvency and Financial Condition Report

2025

C. Risk Profile

In this Chapter

- C.1 Underwriting Risk
- C.2 Market Risk
- C.3 Credit Risk
- C.4 Liquidity Risk
- C.5 Operational Risk
- C.6 Other Material Risks
- C.7 Any Other Information

C. Risk Profile

The 'Risk Profile' section of this report provides information on the key risks encountered by the Company as well as the corresponding processes for monitoring the risk exposures and the techniques in place for the mitigating these risks.

C.1 Underwriting Risk

C.1.1 Exposure

The Company continued settlement of its existing general insurance liabilities, with the Company having ceased to accept business in the London Market in 1995 and is currently not writing (nor projected to write) new business. The Company therefore considers underwriting risk within its general insurance activity to be the management of claims and the adequacy of reserves.

All business is reinsured as the Company is party to a reinsurance agreement entered into with NICO in 2000, which provides substantial protection in excess of current gross liabilities. In addition, the Company has an ARD agreement with its parent company, AIL. This agreement provides an extra £1bn of reinsurance cover to protect against circumstances in which the reinsurance with NICO is exhausted or otherwise fails to satisfy claims. Together these arrangements provide substantial protection in excess of current gross liabilities.

There were no material changes in net underwriting risk over the year.

The Company's overall exposure to underwriting risk is measured and assessed using the SCR. QRT IR.25.04 (Appendix F.1.8) shows that the Company's undiversified SCR for net underwriting risk is immaterial (2024: immaterial). Underwriting risk is also measured and monitored in terms of best estimate liabilities.

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 largest gross exposure is to UK and US asbestos and deafness claims. However, net concentrations to insurance risks are immaterial due to the reinsurance with NICO and the ARD agreement with AIL as captured within the Company's SCR.

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 outsourced functions and reviewed by local actuaries, with periodic independent external reviews by consulting actuaries;
- Governance of outsourced functions writing products on behalf of the Company; and
- Documented claims management philosophies and procedures.

The primary technique used to mitigate underwriting risk is reinsurance, in particular the reinsurance and ARD agreements purchased with NICO and AIL, respectively. The management of insurance risk is overseen by specific senior management committees, namely the AIL Reserve and Projections Committee and the Latents Senior Leadership Team. The on-going effectiveness of these reinsurance arrangements is reviewed annually by the Company's Actuarial Function and 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 Solvency II 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.

Given the current high level of reinsurance headroom in place over the Company's liabilities, and that assets are predominately held in the form of cash, cash equivalents and receivables, the Company has immaterial exposure to market risk.

The Company has assets and claims liabilities in foreign currency, principally USD, and so has exposure to foreign exchange rates. However, there is no material net exposure to exchange rate fluctuations due to the reinsurance arrangements. Section A.4 describes the impact of exchange rate fluctuations during the year.

There has been no material change 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 IR.25.04 (Appendix F.1.8) shows that the Company's undiversified SCR for market risk is immaterial (2024: immaterial).

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

C.2.2 Risk concentration

Liabilities are fully reinsured. In addition to the reinsurance asset, the Company holds cash and cash equivalents and is not exposed to material concentration risk outside of its primary reinsurance arrangements (see C.3).

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 is exposed to third party credit quality changes primarily through reinsurance.

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 exposures to reinsurance counterparties, cash and cash equivalents, and other receivables.

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 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 IR.25.04 (Appendix F.1.8) shows that the Company's undiversified SCR for credit risk is £1,555 thousand (2024: £1,592 thousand).

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 reinsurance assets is strong. At 31 December 2025, all external reinsurance assets were held with counterparties with strong external credit ratings. Cash and cash equivalents are held with highly-rated banking institutions or liquidity funds.

C.3.2 Risk concentration

The Company's main concentration of external credit risk arises from its exposure to NICO via the reinsurance arrangement. At 31 December 2025, Company's exposure to NICO was £251,372 thousand (2024: £253,850 thousand). There is an additional £1bn of ARD provided by the Company's immediate parent AIL (as described in section C1.1).

The Company's main exposure to counterparties within the Group is to its immediate parent, AIL, due to a receivable balance of £50,280 thousand (2024: £50,526 thousand).

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 versus reinsurance recoveries, or the ability to realise assets to produce cash to meet obligations.

Claims are not met directly by the Company but are the responsibility of NICO via an outsourced provider. Material liquidity risk to the Company would arise in the extreme event of NICO failing to meet claims liabilities as they fall due along with material timing mis-matches between reinsurance recoveries from AIL, under the ARD, and claims obligations.

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 event 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. The credit quality of reinsurers is also monitored closely to avert liquidity risks.

C.4.3 Risk mitigation

The Company manages its liquidity risk 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 Solvency II regulations and included within the valuation of the Company's Technical Provisions as at 31 December 2025 is £0 thousand (2024: *£nil thousand*).

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 is exposed to outsourcing risk in regard to activities which could be undertaken by the Company itself but are contracted to third parties. The Company cannot outsource its statutory and regulatory obligations.

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.

The wider environment has increasing inherent exposure to risks such as data theft, conduct breaches and customer service interruption arising from IT systems failure and consequently inherent risk to the company has increased accordingly, including via outsourced operations. 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.

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. The methodology to measure operational risks has changed from a IFRS operating profit basis to a Solvency II Own Funds Generation (SII OFG) basis for financial impacts. This has not materially changed the outcome of the risk assessments.

The Company holds economic capital, based on the Solvency II SCR, against residual operational risk, to the extent that it cannot be eliminated by management action. QRT IR.25.04 (Appendix F.1.8) shows that the Company's undiversified SCR for operational risk is £1,469 thousand (2024: £1,527 thousand). The Company also produces specific conduct risk management information used to measure and analyse its exposure to conduct risk.

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

C.5.2 Risk concentration

The Company has outsourced the handling of claims to a third party.

C.5.3 Risk mitigation

Operational risks are considered by the Company to be preventable and are managed through business controls (subject to the risk of control failure). 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 outsourced business critical activities to a third party and has implemented appropriate oversight mechanisms and has exit and termination arrangements 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.5.5 Additional information

The Company has no other material information to disclose.

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.

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 NICo and ARD arrangements). The outcome of this SST demonstrates that the Company is resilient to a range of potential extreme adverse events.

The Company is also inherently considered within the SST that is completed by its immediate parent company, ALL.

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

The SCR is the primary basis used by the Company to measure and assess its risks. The sensitivity analysis performed by the Company includes consideration of the sensitivity of its Solvency II cover ratio, determined according to Solvency II Regulations, to a range of economic assumptions.

For the Company, this includes consideration of impacts from 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 Solvency II surplus.

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 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.

The Ocean Marine Insurance Company Limited

Solvency and Financial Condition Report 2025

D. Valuation for Solvency Purposes

In this Chapter

- D.1 Assets
- D.2 Technical Provisions
- D.3 Other Liabilities
- D.4 Alternative Methods of Valuation
- D.5 Any Other Information

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 IR.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.

The Company's IFRS balance sheet has been reclassified to the prescribed format of the Solvency II balance sheet QRT. The reclassification is shown in column (c) and relates to the reclassification of cash equivalents, under IFRS, to collective investment undertakings in the Solvency II balance sheet.

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

Where the valuation of assets and liabilities is the same under IFRS and Solvency II, 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 Solvency II 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 Solvency II 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.

Balance Sheet – IFRS and SII

	Note in financial statements	IFRS balance sheet classified according to financial statements	Reclassification of IFRS balances to SII balance sheet categories	Reclassified IFRS balance sheet	SII balance sheet	Valuation differences between SII and IFRS
	(a)	(b)	(c)	(d) =(b)+(c)	(e)	(f) =(e)-(d)
As at 31 December 2025 £000s						
Financial investments						
Collective investment undertakings	N & 18	—	15,400	15,400	15,400	—
Reinsurance recoverables	H & 13	251,372	71	251,443	212,261	(39,182)
Receivables						
Reinsurance	L & 10	71	(71)	—	—	—
Trade, not insurance	L & 10	50,334	(46)	50,288	50,288	—
Cash and cash equivalents	N & 18	20,328	(15,399)	4,929	4,929	—
Assets		322,105	(45)	322,060	282,878	(39,182)
Technical provisions	H & 13	251,443	—	251,443	212,808	38,635
Deferred tax liabilities		—	—	—	—	—
Payables and other financial liabilities						
Reinsurance payables	M & 15	—	—	—	—	—
Payables (trade, not insurance)	M & 15	429	(45)	384	384	—
Other liabilities	M & 16	661	—	661	661	—
Liabilities		252,533	(45)	252,488	213,853	(38,635)
Excess of assets over liabilities		69,572	—	69,572	69,025	(547)

D.1 Assets

Assets have been valued according to the requirements of the Solvency II Directive and related guidance; the basis of the Solvency II 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 Solvency II along with valuation differences between the Solvency II 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 Solvency II.

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.

The Company's reinsurance recoverables relate to the reinsurance of its general insurance claims with NICO.

The lower valuation under Solvency II is driven by the lower valuation of technical provisions (refer to section D.2.3).

The Company does not have any Special Purpose Vehicles.

D.2 Technical Provisions

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

D.2.1 Valuation of Technical Provisions

Technical provisions which comprise Best Estimate Liabilities and a Risk Margin analysed by Solvency II Line of Business are summarised in the table below. The best estimate liabilities are gross of reinsurance. They are also detailed in the QRT IR.17.01 (Non-life Technical Provisions), see Appendix F.1.4.

As at 31 December 2025 £000s	Best Estimate Liabilities	Risk Margin	Technical Provisions
Line of Business			
Marine, aviation and transport	5,245	13	5,258
General liability insurance	157,303	406	157,709
Accepted non-proportional reinsurance	49,713	127	49,840
Total	212,261	546	212,807

D.2.1.1 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.

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.

As the Company has been managing its existing general insurance claims liabilities and is currently not writing (nor projected to write) new business, its Best Estimate Liabilities comprise only a claims provision. The claims provision includes cash flows relating to events that occurred before the valuation date, whether reported or not. The cash flows include net claims costs and expenses.

When modelling these cash flows the inflows are considered separately from the outflows. Claims costs take into account recoveries from salvage and subrogation.

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 estimation of ultimate claims costs is done at the level of homogeneous risk groups. These groups are mapped to Solvency II lines of business.

Certain lines of business are also further analysed by claim type or type of coverage. For example latent claims require specialist actuarial techniques appropriate for the nature of the underlying liabilities. Given the long delay between writing the insurance policy and the claim arising, the techniques used for latent claims typically group claims data by the year claims are reported and project the future number and average cost of claims for homogeneous latent claim types based on a combination of own Company experience and industry-wide data. The Company participates on cross-industry working groups to help inform some of the projection assumptions for latent claims.

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.

The level of uncertainty associated with latent claims is considerable due to the relatively small number of claims and the long-tail nature of the liabilities. Claims related to asbestos production and handling account for a large proportion of the Company's latent claims. The key assumptions underlying the estimation of these claims include claim numbers, the base average cost per claim, future inflation in the average cost of claims and legal fees.

Expenses

Given the nature of the Company's reinsurance arrangements, there are no expense components within Best Estimate Liabilities.

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 Solvency II lines of business level, and at portfolio level with allocations to Solvency II lines of business, depending on the scenario being considered. Given that the Company has been managing its existing general insurance claims liabilities through to run-off for a number of years and is currently not writing (nor projected to write) new business, the main ENID considered for the Company is in relation to a legislative change which impacts outstanding gross of reinsurance claims liabilities.

Discounting

All cash flows are discounted using the appropriate Solvency II yield curve in the relevant currency. The yield curve is based on the risk free rate at the valuation date and is adjusted for the PRA prescribed credit risk adjustment 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 2025.

D.2.1.2 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 Solvency II line of business, although on materiality grounds some Solvency II lines of business are allocated no Risk Margin.

The Company's Risk Margin is £546 thousand (2024: £585 thousand) as at 31 December 2025.

D.2.1.3 Simplifications

Best Estimate Liabilities

In some areas of the calculation of the Solvency II Best Estimate Liabilities, simplified methods have been used. The simplifications used have been assessed and have no material impact on the value of Solvency II 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 Solvency II Best Estimate Liabilities are:

- The majority of the Company Best Estimate Liabilities are in GBP and USD. As part of the calculation of Technical Provisions, the Company segments liabilities in these currencies. On materiality grounds, exposure to currencies outside of GBP and USD are not separately segmented and are instead converted to GBP or USD at prevailing exchange rates.
- 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.

D.2.1.4 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:

- New types of latent claims;
- Unanticipated legislative changes; and
- Unanticipated inflation.

In conducting its insurance business, the Company receives general insurance liability claims, and becomes involved in actual or threatened related litigation arising therefrom, including claims in respect of pollution and other environmental hazards, professional negligence and injuries suffered participating in sporting activities. Amongst these are claims in respect of asbestos production and handling. Given the significant delays that are experienced in the notification of these claims, the potential number of incidents which they cover and the uncertainties associated with establishing liability, the ultimate cost is subject to uncertainty. Gross of reinsurance the level of uncertainty within the Technical Provisions for latent claims is high. The Company has extensive reinsurance in place against these claims so net of reinsurance the level of uncertainty is insignificant.

D.2.3 Material differences between the Solvency II and IFRS valuation bases

The following table summarises gross of reinsurance Solvency II Technical Provisions by material line of business and compares these to IFRS reclassified Technical Provisions.

Technical Provisions as at 31 December 2025 £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	212,261	546	212,808	251,443	38,635
– Marine, aviation and transport	5,245	13	5,258	6,212	955
– General liability insurance	157,303	406	157,709	186,341	28,631
– Accepted non-proportional reinsurance	49,713	127	49,841	58,890	9,049
Total	212,261	546	212,808	251,443	38,635

The material differences between the Solvency II and IFRS valuation bases are:

- Solvency II Technical Provisions include the Risk Margin, which is not included within IFRS Provisions, and which increases Solvency II Technical Provisions compared to IFRS Provisions;
- A Risk Adjustment is included within IFRS Provisions but removed under Solvency II. This impacts all lines of business and reduces Solvency II 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.

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: 2191475). The impact of the Volatility Adjustment on Technical Provisions, Basic Own Funds, Eligible Own Funds to meet the SCR, the SCR, Eligible Own Funds to meet the Minimum Capital Requirement (MCR) and the MCR is detailed in the Long Term Guarantees and Transitional measures QRT IR.22.01 (see Appendix F.1.6). The impact of removing the Volatility Adjustment from gross Technical Provisions would be to increase their value by £3,431 thousand (2024: £5,961 thousand).

D.2.5 Other reliefs

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

D.3 Other Liabilities

The Company does not have any material classes of liability, excluding Technical Provisions as at 31 December 2025 (2024: £nil). The Company's financial statements provide information about contingent liabilities and other risk factors in note 17. The Company has no additional material contingent liabilities to recognise under Solvency II.

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.

The Ocean Marine Insurance Company Limited

Solvency and Financial Condition Report 2025

E. Capital Management

In this Chapter

- E.1 Own Funds
- E.2 Solvency Capital Requirement and Minimum Capital Requirement
- E.3 Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement
- E.4 Differences between the Standard Formula and any Internal Model used
- E.5 Non-Compliance with the Minimum Capital Requirement and Non-Compliance with the Solvency Capital Requirement
- E.6 Any Other Information

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 including information about the Company's IM.

E.1 Own Funds

E.1.1 Management of Own Funds

The Company's policy on capital and risk management is set out in its Risk Management Framework. The Company's capital and risk management objectives are closely interlinked and recognise 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.

The Company manages its capital in accordance with its risk appetites, to satisfy the requirements of regulators and other stakeholders. This gives policyholders and the shareholder assurance of the Company's financial strength. The Company also aims to retain financial flexibility by maintaining sufficient liquidity.

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.

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.

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 IR.23.01.01, (see Appendix F.1.7), and summarised below.

Own Funds £000s	Tier 1		Tier 1	
	Total 2025	(unrestricted) 2025	Total 2024	(unrestricted) 2024
As at 31 December				
Ordinary share capital	1,000	1,000	1,000	1,000
Reconciliation reserve	68,025	68,025	67,860	67,860
Total Basic Own Funds	69,025	69,025	68,860	68,860

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.

Tier 1 Own Funds increased by £165 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 2025	£000s 2024
Solvency II excess of assets over liabilities	69,025	68,860
Ordinary share capital	(1,000)	(1,000)
Reconciliation reserve	68,025	67,860

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 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 2025	£000s 2024
Total eligible Own Funds to meet the SCR	69,025	68,860
Total eligible Own Funds to meet the MCR	69,025	68,860

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

As at 31 December	2025	2024
Ratio of eligible Own Funds to the SCR	991 %	997 %
Ratio of eligible Own Funds to the MCR	1972 %	1967 %

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 Solvency II basis. The excess of £69,025 thousand is £547 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 Solvency II basis and total equity on an IFRS basis.

As at 31 December 2025	£000s	£000s	See Section
Total equity on an IFRS basis		69,572	
Valuation adjustments to reinsurance recoverables	(39,182)		D.2.1
Valuation adjustments to Technical Provisions	38,635		D.2.3
Net deferred tax adjustments	—		D.1.6
		(547)	
Excess of assets over liabilities on a Solvency II basis		69,025	

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 2025 was £6,965 thousand (2024: £6,907 thousand). This is shown in the SCR QRT, IR.25.04, see Appendix F.1.8. The Company's MCR as at 31 December 2025 was £3,500 thousand (2024: £3,500 thousand). This is shown on the MCR QRT, IR.28.01, see Appendix F.1.9. The final amount of the SCR is still subject to supervisory assessment and does not include any regulator-imposed capital add-ons.

E.2.2 The composition of the SCR

The Company determines its SCR using an IM. Material risk categories are shown below. Further detail is shown in the SCR QRT IR.25.04.

Diversified SCR by material risk category (per the SCR QRT) As at 31 December	£000s	
	2025	2024
Counterparty risk	1,555	1,592
Operational risk	1,469	1,527
Diversification between risk categories	3,940	3,788
Total SCR	6,965	6,907

Each risk component includes the impact of diversification within that component. The SCR includes the impact of diversification between the risk categories. At 31 December 2025, there is negative diversification benefit between counterparty and operational risks (both of which are highly skewed) which is consistent with previous years. Overall and by individual risk the movements in the SCR relative to last year are not material.

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 £3,500 thousand. The Company's MCR is the absolute minimum which is £3,500 thousand (2024: £3,500 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

E.4.1 Key uses of the IM

The IM provides input to a number of key business processes and activities. Therefore, the outputs from the IM are used in day-to-day risk management and business decisions across the Company. "Use" does not imply that the IM is used to directly run the business, but rather that the outputs of the IM and the IM itself are used to support decision-making, whilst acknowledging its limitations and balancing against other elements of the Risk Management Framework.

The primary purpose of the Company's IM is to calculate the capital metrics, principally the SCR (unaudited), required for regulatory reporting under Solvency II. The outputs of the Company's IM are also used in risk-based performance reporting and risk and financial strength reporting to senior management, the Board, the shareholder and rating agencies.

The granular metrics produced by the IM are used in setting the Company's strategy and support a series of other activities including:

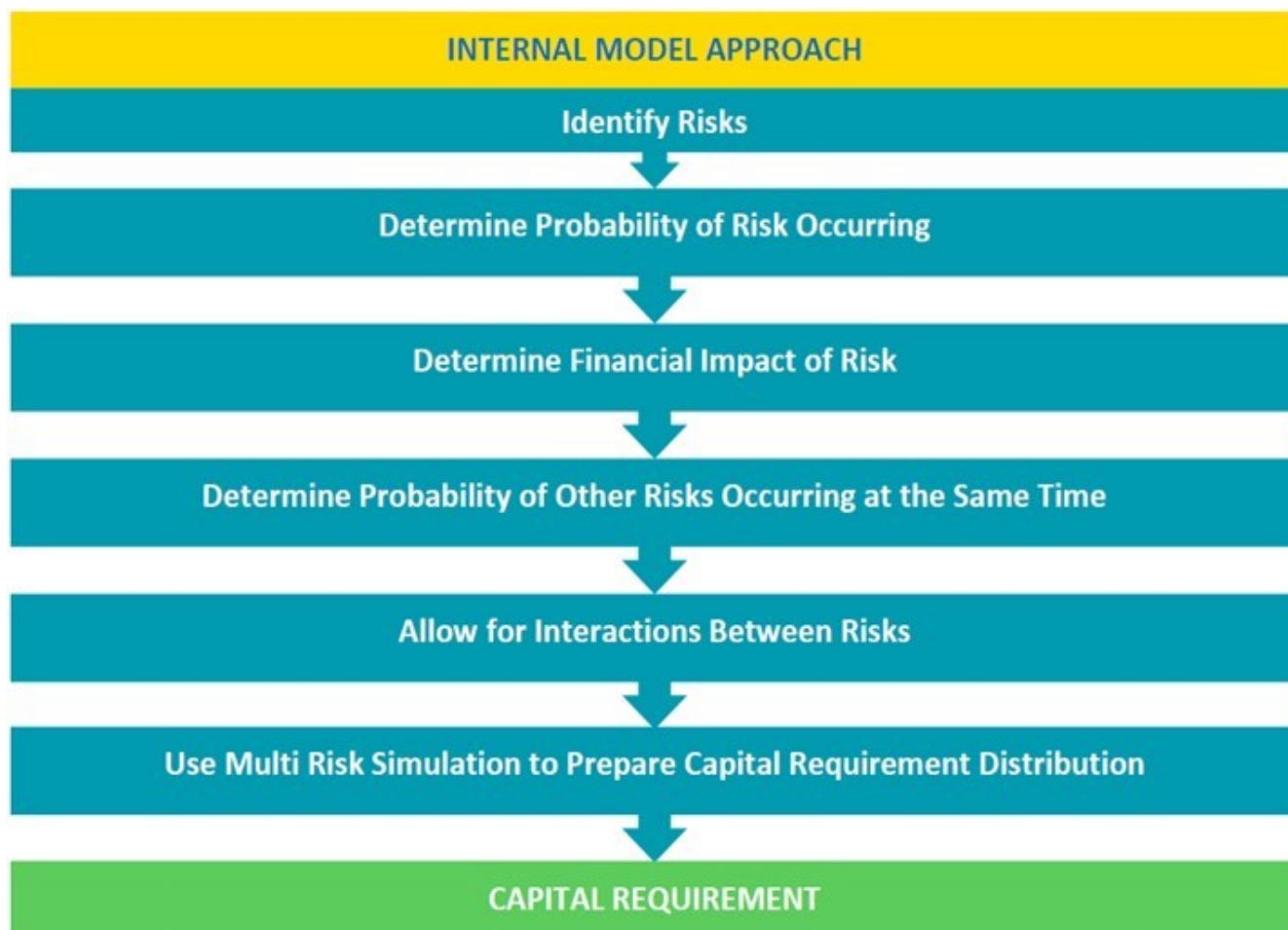
- Business planning, capital allocation, and setting risk appetites;
- Reviewing the effectiveness of the reinsurance contracts in place to mitigate undesirable risk exposures, through modelling potential adverse scenarios; and
- Measuring the impact of market changes on assets and liabilities to drive investment strategy.

E.4.2 Scope of the IM

The Company uses an IM to calculate its SCR covering all of the Company's business units and risk categories.

E.4.3 Method used in the IM for calculating the probability distribution forecast

The purpose of the IM is to identify the risks to which the Company is exposed, model these risks using suitably calibrated inputs and aggregate them to compute the SCR (unaudited). An overview of the Company's approach is shown below.



The Company's IM allows flexibility in determining which statistical distributions to use to represent risk factors. This flexibility is important as it ensures that the behaviour of the most important risks to the Company is modelled appropriately.

For the market risk factors standard statistical distributions are used which are fitted via the standard risk factor calibration process. However, for other risk types, such as non-life underwriting and operational risk, distributions are derived from further modelling processes. This approach is appropriate given both the materiality of these risk types and the desire to ensure the risk's behaviour is adequately captured.

The Company uses a wide range of testing and review processes to ensure that the calibrations are appropriate and the IM outputs are reasonable. These range from bottom-up reviews of the material assumptions used in the modelling process and the testing of the calibrations and loss functions, to top-down stress and scenario testing.

Risk measure and time period used in the IM

The IM produces an aggregate distribution of the change in basic Own Funds over a one year time horizon from which the SCR can be directly derived. The SCR is the 99.5th percentile.

E.4.4 Material differences between the SF and IM methodologies and assumptions

The key difference between SF and the IM is that the IM has been tailored to the Company's risk profile. The IM calibrates a distribution of losses for each risk and uses these, together with a set of correlations between these risks, to derive a joint distribution of losses for the Company. The SCR (unaudited) is derived from this and ensures the Company holds sufficient capital to withstand a 1 in 200 event over one year. Calibrating risks for the IM therefore requires detailed data analysis and use of statistical models. SF simply uses prescribed formulae to calculate the capital required for each risk exposure.

Material differences between the SF and IM methodologies and assumptions by risk type are:

Market risk

- In the Company's IM interest rates are modelled in more detail to ensure changes in the slope and shape of the yield curve are captured. SF only considers the change in the level of interest rates.

- The IM allows for the accrual of interest on the own funds at the risk free rate over the one-year time horizon which is offset against the SCR. This is not reflected in the SF approach.

Non-life underwriting risk

- Risks relating to latent claims, which are not explicitly included under SF, are included in the Company's IM.
- The Company's IM employs a finer level of granularity for material lines of business which allows for more distinction between material product types and in particular between commercial and personal lines which are grouped in SF.
- The Company's IM captures risks where the probability of extreme values is higher than normal, SF does not consider these elements.
- Inflation risk is explicitly included in the Company's IM, whereas there is no inflation risk in SF beyond that implicitly captured in the calibrations of the premium and reserve risks.

Operational risk

- The Company's IM assesses operational risk using a scenario based approach. SF uses a simple formulaic approach.

Counterparty risk

- SF considers all counterparty default risk under one module. The Company's IM takes into account both the type of the counterparty and the nature of the exposure; and
- The Company's IM considers default risk in more detail, taking into account spread risks and diversification between various credit exposures. SF does not consider these elements.

Aggregation, diversification and tax

- The Company's IM allows it to determine diversification at a more granular level and capture important features such as its geographical diversification;
- The Company's IM uses explicit correlation matrices to combine sub-module losses within each risk module, and then to combine the calculated losses of the different risk modules. The SF uses a simpler hierarchical correlations approach; and
- The Company's IM assesses loss functions net of tax. The SF calculation requires tax relief to be deducted from the gross SCR.

E.4.5 Data used in the IM

The data used in the Company's IM includes:

- Accounting data, computed on an IFRS basis, which is used in the valuation of assets and liabilities;
- Policy data from past policies that includes premium data, historic data on claims and exposure data covering potential catastrophic events such as on geographical concentrations;
- Operational risk data obtained from a range of sources;
- Financial market data, including asset data externally obtained such as from FTSE 100 index;
- Asset data including the market value of assets, most often derived from the accounting data; and
- Other data including numerical, census or classification information, but excluding qualitative information.

As part of the Company's data governance process the appropriateness of the data is considered before it is used in the IM. Data accuracy, appropriateness and completeness are monitored on an ongoing basis by the Company's Data Governance Council. The data used in the IM in 2025 was formally approved by the Company's Chief Actuary, supported by the Data Governance Council.

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.

The Ocean Marine Insurance Company Limited

Solvency and Financial Condition Report

2025

F. Appendices

In this Section

- F.0 Cautionary Statement
- F.1 Public Disclosure Quantitative Reporting Templates
 - F.1.1 IR.02.01 Balance Sheet
 - F.1.2 IR.05.02 Premiums ,claims and expenses by country [non-life]
 - F.1.3 IR.05.04 Premium claims and expenses (by line of business) [non-life]
 - F.1.4 IR.17.01 Technical Provisions [non-life]
 - F.1.5 IR.19.01 Insurance claims [non-life]
 - F.1.6 IR.22.01 Impact of transitional measures
 - F.1.7 IR.23.01 Own Funds
 - F.1.8 IR.25.04 Solvency Capital Requirement
 - F.1.9 IR.28.01 Minimum Capital Requirement
- F.2 Glossary of Abbreviations and Definitions
- F.3 Directors' Statement
- F.4 Auditors' Report

F.0 Cautionary Statement

This report 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 and other future events and circumstances (including climate and other sustainability related plans and goals). Statements including those containing the words 'believes', 'intends', 'expects', 'projects', 'plans', 'will', 'seeks', 'aims', 'may', 'might', 'could', 'should', 'outlook', 'likely', 'target', 'goal', 'guidance', 'trends', 'future', 'estimates', 'potential', 'possible', 'objective', 'predicts', 'ambition' and 'anticipates', and words of similar meaning, are forward-looking. By their nature, all forward-looking statements are subject to known and unknown risks 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 report include, 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 current and emerging geopolitical landscape and rising protectionist measures); 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 their 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 commence 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 pandemics) 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 sustainability; our reliance on information and technology and third-party service providers for our operations and systems; technological developments; 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; 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 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 and the potential loss of or damage to customer relationships, whether related to changes in customer habits or not; changes in laws and legal or public policy, in particular; 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 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 report, or any other forward-looking statements may make. Forward-looking statements in this report are current only as of the date on which such statements are made and readers are cautioned not to place undue reliance on such forward-looking statements. Such statements should be regarded as indicative and illustrative only, and the Company does not provide any representation, assurance or guarantee that the occurrence of the events expressed or implied in any forward-looking statements in this presentation will naturally occur.

This Solvency and Financial Condition Report has been published for information only, it is based on our understanding as at 24 March 2026 and does not provide financial or legal advice. Other than as set out in section F.3 (Directors Certificate), the 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**IR.02.01.02.01****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	15,400
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	15,400
Derivatives	R0190	
Deposits other than cash equivalents	R0200	
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	
Reinsurance recoverables from:	R0270	212,261
Non-life and health similar to non-life	R0280	212,261
Life and health similar to life, excluding index-linked and unit-linked	R0315	
- Reinsurance recoverables - Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance & intermediaries receivables	R0360	
Reinsurance receivables	R0370	
Receivables (trade, not insurance)	R0380	50,288
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	4,929
Any other assets, not elsewhere shown	R0420	
Total assets	R0500	282,878
Liabilities		
Technical provisions - total	R0505	212,808
Technical provisions - non-life	R0510	212,808
Technical provisions - life	R0515	
Best estimate - total	R0542	212,262
Best estimate - non-life	R0544	212,262
Best estimate - Life	R0546	
Risk margin - total	R0552	546
Risk margin - non-life	R0554	546
Risk margin - Life	R0556	
Transitional (TMTP) - life	R0565	
Other technical provisions	R0730	
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	
Pension benefit obligations	R0760	
Deposits from reinsurers	R0770	
Deferred tax liabilities	R0780	
Derivatives	R0790	
Debts owed to credit institutions	R0800	
Financial liabilities other than debts owed to credit institutions	R0810	
Insurance & intermediaries payables	R0820	
Reinsurance payables	R0830	
Payables (trade, not insurance)	R0840	384
Subordinated liabilities	R0850	
Subordinated liabilities not in basic own funds	R0860	
Subordinated liabilities in basic own funds	R0870	
Any other liabilities, not elsewhere shown	R0880	661
Total liabilities	R0900	213,853
Excess of assets over liabilities	R1000	69,025

Appendix F.1.2**IR.05.02.01****Premiums, claims and expenses by country**

Amounts in 000s

	Home Country							Total Top 5 and home country
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums written								
Gross - Direct Business	R0110	9						9
Gross - Proportional reinsurance accepted	R0120							
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140	9						9
Net	R0200							
Premiums earned								
Gross - Direct Business	R0210	9						9
Gross - Proportional reinsurance accepted	R0220							
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240	9						9
Net	R0300							
Claims incurred								
Gross - Direct Business	R0310	10,602						10,602
Gross - Proportional reinsurance accepted	R0320							—
Gross - Non-proportional reinsurance accepted	R0330							—
Reinsurers' share	R0340	10,588						10,588
Net	R0400	14						14
Net expenses incurred								
	R0550	144						144

Appendix F.1.4

IR.17.01.02

Non-Life Technical Provision

Direct business and accepted proportional reinsurance

Amounts in £000s		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130
Best estimate													
Premium provisions													
Gross	R0060												
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140												
Net Best Estimate of Premium Provisions	R0150												
Claims provisions													
Gross	R0160						5,245		157,303				
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240						5,245		157,303				
Net Best Estimate of Claims Provisions	R0250						—						
Total Best estimate - Gross	R0260						5,245		157,303				
Total Best estimate - Net	R0270						—						
Risk margin	R0280						13		406				
Technical provisions - total (best estimate plus risk margin)													
Technical provisions - Total	R0320						5,258		157,709				
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - Total	R0330						5,245		157,303				
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - Total	R0340						13		406				

Amounts in £000s	Accepted non-proportional reinsurance				Total Non-life obligation
	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
	C0140	C0150	C0160	C0170	C0180
Best estimate					
Premium provisions					
Gross	R0060				
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140				
Net Best Estimate of Premium Provisions	R0150				
Claims provisions					
Gross	R0160		49,285	428	212,261
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240		49,285	428	212,261
Net Best Estimate of Claims Provisions	R0250				—
Total Best estimate - Gross	R0260		49,285	428	212,261
Total Best estimate - Net	R0270				—
Risk margin	R0280		1	126	546
Technical provisions - total (best estimate plus risk margin)					
Technical provisions - Total	R0320		49,286	554	212,807
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - Total	R0330		49,285	428	212,261
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - Total	R0340		1	126	546

Appendix F.1.5

IR.19.01.021

Non-Life Insurance Claims Information

Amounts in 000s

Total Non-Life Business

Accident year / Underwriting year
Gross Claims Paid (non-cumulative)
(absolute amount)

Z0020	AY
-------	----

	Development Year											In Current year	Sum of years (cumulative)
	0	1	2	3	4	5	6	7	8	9	10&+		
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		
Prior												7,089	7,089
R0160													
R0170													
R0180													
R0190													
R0200													
R0210													
R0220													
R0230													
R0240													
R0250													
R0260													

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

	Development Year											Year end (discounted data)	Sum of years (cumulative)
	0	1	2	3	4	5	6	7	8	9	10&+		
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		
Prior												139,697	101,860
R0160													
R0170													
R0180													
R0190													
R0200													
R0210													
R0220													
R0230													
R0240													
R0250													
R0260													

Appendix F.1.6**IR.22.01.21****Impact of long term guarantees and transitional measures**

Amounts in 000s

	C0010	C0030	C0050	C0070	C0090
Technical Provisions	212,808			3,431	
Basic Own Funds	69,025				
Eligible own funds to meet Solvency Capital Requirement	69,025				
Solvency Capital Requirement	6,965			3	
Eligible own funds to meet Minimum Capital Requirement	69,025				
Minimum Capital Requirement	3,500				

	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
R0010	212,808			3,431	
R0020	69,025				
R0050	69,025				
R0090	6,965			3	
R0100	69,025				
R0110	3,500				

Appendix F.1.8**IR.25.04.21.01****Solvency Capital Requirement - For undertakings using the standard formula and partial internal model**

Amounts in 000s

			C0010
Net of loss-absorbing capacity of technical provisions	Market risk	Interest rate risk	R0140
		Equity risk	R0070
		Property risk	R0080
		Spread risk	R0090
		Concentration risk	R0100
		Currency risk	R0110
		Other market risk	R0120
		Diversification within market risk	R0125
			R0130
	Counterparty default risk	Type 1 exposures	R0180
		Type 2 exposures	R0150
		Other counterparty risk	R0160
		Diversification within counterparty default risk	R0165
			R0170
	Life underwriting risk	Mortality risk	R0270
		Longevity risk	R0190
		Disability-Morbidity risk	R0200
		Life-expense risk	R0210
		Revision risk	R0220
		Lapse risk	R0230
		Life catastrophe risk	R0240
		Other life underwriting risk	R0250
		Diversification within life underwriting risk	R0255
			R0260
	Total health underwriting risk		R0320
		Health SLT risk	R0280
		Health non SLT risk	R0290
		Health catastrophe risk	R0300
		Other health underwriting risk	R0305
		Diversification within health underwriting risk	R0310
	Non-life underwriting risk		R0370
		Non-life premium and reserve risk	R0330
		Non-life catastrophe risk	R0340
		Lapse risk	R0350
		Other non-life underwriting risk	R0355
		Diversification within non-life underwriting risk	R0360
			R0400
Intangible asset risk			R0430
Operational and other risks			1,469
	Operational risk		R0422
	Other risks		R0424
			R0432
Total before all diversification			3,024,209
Total before diversification between risk modules			R0434
Diversification between risk modules			3,024,209
Total after diversification			R0436
Loss-absorbing capacity of technical provisions			R0438
Loss-absorbing capacity of deferred taxes			3,024,209
Other adjustments			R0440
Solvency capital requirement including undisclosed capital add-on			R0450
Disclosed capital add-on - excluding residual model limitation			R0455
Disclosed capital add-on - residual model limitation			3,940,375
Solvency capital requirement including capital add-on			R0460
Biting interest rate scenario			R0472
Biting life lapse scenario			6,964,584
			R0474
			R0480
			6,964,584
			R0490
			R0495

Appendix F.1.9**IR.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

MCRNL Result

R0010

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
 Income protection insurance and proportional reinsurance
 Workers' compensation insurance and proportional reinsurance
 Motor vehicle liability insurance and proportional reinsurance
 Other motor insurance and proportional reinsurance
 Marine, aviation and transport insurance and proportional reinsurance
 Fire and other damage to property insurance and proportional reinsurance
 General liability insurance and proportional reinsurance
 Credit and suretyship insurance and proportional reinsurance
 Legal expenses insurance and proportional reinsurance
 Assistance and proportional reinsurance
 Miscellaneous financial loss insurance and proportional reinsurance
 Non-proportional health reinsurance
 Non-proportional casualty reinsurance
 Non-proportional marine, aviation and transport reinsurance
 Non-proportional property reinsurance

	C0020	C0030
R0020		
R0030		
R0040		
R0050		
R0060		
R0070		
R0080		
R0090		
R01 00		
R0110		
R0120		
R0130		
R0140		
R0150		
R0160		
R0170		

Linear formula component for life insurance and reinsurance obligations

MCRL Result

R0200

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
 Obligations with profit participation - Future discretionary benefits
 Index-linked and unit-linked insurance obligations
 Other life (re)insurance and health (re)insurance obligations
 Total capital at risk for all life (re)insurance obligations

	C0050	C0060
R0210		
R0220		
R0230		
R0240		
R0250		

Overall MCR calculation

Linear MCR
 SCR
 MCR cap
 MCR floor
 Combined MCR
 Absolute floor of the MCR

R0300

R0310	6,965
R0320	3,134
R0330	1,741
R0340	1,741
R0350	3,500

C0070

Minimum Capital RequirementR0400

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 The Ocean Marine Insurance Company Limited at 31 December 2025 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 2025, 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 2025 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 2026.

J J Goodson

Director

9 April 2026

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.