

31 December 2017

Contents

Exec	cutive Summary	4
Dire	ectors' Statement of Responsibilities	6
Aud	lit Report	7
A. B	Business and performance	11
A.1	Business details and group structure	11
A.2	Performance from underwriting activities	12
A.3	Performance from investment activities	14
A.4	Performance from other activities	15
A.5	Any other information	15
B. S	System of governance	16
B.1	General information on the system of governance	16
B.2	Fit and proper requirements	22
B.3	Risk management system including the ORSA	23
B.4	Internal control system	26
B.5	Internal audit function	27
B.6	Actuarial function	28
B.7	Outsourcing	29
B.8	Any other information	30
C. R	Risk profile	31
C.1	Underwriting risk	31
C.2	Market risk	32
C.3	Credit risk	
C.4	Liquidity risk	34
C.5	Operational risk	35
C.6	Other material risks	36
C.7	Any other information	37
D. V	/aluation for solvency purposes	38
D.1	Assets	39
D.2	Technical provisions	40
D.3	Other liabilities	44
D.4	Alternative methods for valuation	45
D.5	Any other information	45

The E	Saptist Insurance Company PLC – Solvency and Financial Condition Report – 31 December 2017	
E. Ca	apital Management	46
E.1	Own funds	46
E.2	Solvency Capital Requirement [SCR] & Minimum Capital Requirement [MCR]	50
E.3	Use of the duration-based equity risk sub-module in the calculation of the SCR	51
E.4	Differences between the standard formula and the internal model	52
E.5	Non-compliance with the MCR and non-compliance with the SCR	52
E.6	Any other information	52
Appe	ndix 1 – QRT S.02.01.02 Balance Sheet	53
Appe	ndix 2 – QRT S.05.01.02 Non-life premiums, claims and expenses by line of business	55
Appe	ndix 3 – QRT S.05.02.01 Non-life premiums, claims and expenses by country	56
Appe	ndix 4 – QRT S.17.01.02 Non-life technical provisions	57
Appe	ndix 5 – QRT S.19.01.21 Non-life insurance claims	58
Appe	ndix 6 – QRT S.23.01.01 Own Funds	59
Appe	ndix 7 – QRT S.25.01.21 Solvency Capital Requirement	60
Appe	ndix 8 – QRT S.28.01.01 Minimum Capital Requirement	61

Executive Summary

Introduction

This Solvency and Financial Condition Report (SFCR) has been prepared in line with the requirements of the Solvency II (SII) Regulations, to assist the customers, business partners and shareholders of The Baptist Insurance Company PLC (the Company) and other stakeholders in understanding the nature of the business, how it is managed and its solvency position.

Our business

The Company is an independent, specialist financial services company that provides insurance and risk management advice for churches, as well as offering home insurance for Baptist Ministers, church volunteers and church members.

The vision of the Company is to be the first choice insurer within the Baptist family. The mission is to run a successful business with the highest standards of integrity and help to create safe environments for worship, witness and service.

Success includes being able to generate distributable profits that may be used to strengthen the Company's capital position and to reinvest in the Baptist community through payment of charitable grants.

Business Performance

The Company has seen a strong performance for 2017, delivering the highest level of operating profit (profit before charitable grants, finance costs and tax) in the last three years. This result, driven by a strong investment return, has enabled the Company to maintain their commitment of providing charitable grants to the Baptist Community, whilst continuing to strengthen its capital position.

At £115k, the underwriting result for the year had increased from the prior year as the strengthening of the reserves for historic liability claims was not as great as was required in 2016. When these are excluded the underwriting performance actually saw a deterioration in comparison to the prior year, with the increased cost of large loss claims more than outweighing the reduction seen in the cost of attritional claims.

Despite the volatility caused by the external environment, as the UK continues to face uncertainty in regards to how it will interact with the European Union after its exit and the disconcerting interaction between the USA and North Korea, the investment portfolio performed well generating returns of £506k in the year.

The Company continued to operate a Joint Administration Agreement with the Administrator, as a result the governance of the Company remained stable and in line with the previous year.

Solvency and Financial Condition

The Company uses the Standard Formula to calculate its Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR). A summary of the Company's solvency position at the end of 2017 and the change over the year is shown below:

Summary solvency position	2017 £'000	2016 £'000	Change £'000
Own Funds	6,943	6,358	585
Market risk	1,582	1,030	552
Counterparty default risk	493	486	7
Non-life underwriting risk	89	90	(1)
Diversification	(359)	(323)	(36)
Operational risk	107	106	1
Loss absorbing capacity of deferred tax	(152)	(110)	(42)
Standard Formula SCR	1,760	1,279	481
MCR	3,251	3,332	(81)
Coverage ratio (SCR)	394%	497%	(103%)
Coverage ratio (MCR)	214%	191%	23%

The Company's regulatory solvency position has remained very strong. Own funds increased by £585k in the year mainly due to an increase in retained earnings driven by a strong investment and underwriting performance. This is explained in more detail in section E.1.

The Company's SCR increased in the year by £481k, due mainly to market risk. The growth in this risk area is driven by the purchase of equity holdings during the year which are not eligible for transitional relief. The MCR for the Company has decreased due to exchange rate movement. More detail on the changes in SCR and MCR is given in section E.2.

Outlook for 2018

The UK insurance market continues to be dynamic, competitive and price focused. Political events look set to continue to dominate the risk outlook, with the potential for shocks to financial markets as they seek to evaluate the impacts for global trade and growth. Although Brexit does not have an operational impact on the Company there is still a long way to go before the full implications become clear.

Cyber crime also continues to be a risk for the financial services sector as a whole, and the regulatory change agenda is set to continue. In particular, the General Data Protection Regulation (GDPR) which will bring regulation of data privacy up to date, comes into operation in May 2018.

The Company anticipates continued investment market volatility and a continuing low interest rate environment. As described in Section C.2, the company is exposed to market risk, particularly interest rate and equity risk, and this could lead to capital volatility in the future. The Company's capital position remains very strong and is well placed to weather continuing market volatility.

Directors' Statement of Responsibilities

The Baptist Insurance Company PLC

Financial year ended 31 December 2017

Statement required by Article 55 of the Solvency II Directive

We acknowledge our responsibility for preparing the Solvency and Financial Condition Report (SFCR) in all material respects in accordance with the Prudential Regulation Authority (PRA) Rules and the Solvency II Regulations.

We are satisfied that:

- a) Throughout the financial year in question, the insurer has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable to the insurer; and
- b) It is reasonable to believe that the insurer has continued so to comply subsequently, and will continue so to comply in future.

M.N. Hayes Chairman

Date: 1 May 2018

Malun. Bry

M.R. Buttrick Deputy Chairman Date: 1 May 2018

Page 6 of 62

Audit Report

REPORT OF THE EXTERNAL INDEPENDENT AUDITOR TO THE DIRECTORS OF BAPTIST INSURANCE COMPANY PLC ('THE COMPANY') PURSUANT TO RULE 4.1 (2) OF THE EXTERNAL AUDIT CHAPTER OF THE PRA RULEBOOK APPLICABLE TO SOLVENCY II FIRMS

Report on the Audit of the relevant elements of the Solvency and Financial Condition Report ("SFCR")

Opinion

Except as stated below, we have audited the following documents prepared by the Company as at 31 December 2017:

- the 'Valuation for solvency purposes' and 'Capital Management' sections of the SFCR of the Company as at 31 December 2017, ('the Narrative Disclosures subject to audit'); and
- Company templates S.02.01.02, S.17.01.02, S.23.01.01, S.25.01.21, S.28.01.01 ('the Templates subject to audit').

The Narrative Disclosures subject to audit and the Templates subject to audit are collectively referred to as the 'relevant elements of the SFCR'.

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

- the 'Executive summary', 'Business and performance', 'System of governance' and 'Risk profile' elements of the SFCR;
- Company templates S.05.01.02, S.05.02.01, S.19.01.21;
- the written acknowledgement by management of their responsibilities, including for the preparation of the SFCR ('the Responsibility Statement').

In our opinion, the information subject to audit in the relevant elements of the SFCR of the Company as at 31 December 2017 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals and determinations.

Basis for opinion

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

Emphasis of Matter - Basis of Accounting

We draw attention to the 'Valuation for solvency purposes' and 'Capital Management' and other relevant disclosures sections of the SFCR, which describe the basis of accounting. The SFCR is prepared in compliance with the financial reporting provisions of the PRA Rules and Solvency II regulations, and therefore in accordance with a special purpose financial reporting framework. The SFCR is required to be published, and intended users include but are not limited to the PRA. As a result, the SFCR may not be suitable for another purpose. Our opinion is not modified in respect of these matters.

Conclusions relating to going concern

We are required by ISAs (UK) to report in respect of the following matters where:

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

We have nothing to report in relation to these matters.

Other Information

The Directors are responsible for the Other Information.

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

In connection with our audit of the SFCR, our responsibility is to read the Other Information and, in doing so, consider whether the Other Information is materially inconsistent with the relevant elements of the SFCR, or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the relevant elements of the SFCR or a material misstatement of the Other Information. If, based on the work we have performed, we conclude that there is a material misstatement of this Other Information, we are required to report that fact.

We have nothing to report in relation to these matters.

Responsibilities of Directors for the Solvency and Financial Condition Report

The Directors are responsible for the preparation of the SFCR in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations which have been modified by the modifications, and supplemented by the approvals and determinations made by the PRA under section 138A of FSMA, the PRA Rules and Solvency II regulations on which they are based.

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

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

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

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

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

Use of our Report

This report is made solely to the Directors of The Baptist Insurance Company plc in accordance with Rule 4.1 (2) of the External Audit Chapter of the PRA Rulebook for Solvency II firms. We acknowledge that our report will be provided to the PRA for the use of the PRA solely for the purposes set down by statute and the PRA's rules. Our audit work has been undertaken so that we might state to the insurer's Directors those matters we are required to state to them in an auditor's report on the relevant elements of the SFCR and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the PRA, for our audit work, for this report or for the opinions we have formed.

Report on Other Legal and Regulatory Requirements

In accordance with Rule 4.1 (3) of the External Audit Chapter of the PRA Rulebook for Solvency II firms we are required to consider whether the Other Information is materially inconsistent with our knowledge obtained in the audit of The Baptist Insurance Company plc's statutory financial statements. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in relation to this matter.

Elanor Gill (Senior statutory auditor) For and on behalf of Deloitte LLP Statutory Auditor

London, United Kingdom

1 May 2018

Appendix – relevant elements of the Solvency and Financial Condition Report that are not subject to audit

Solo standard formula

The relevant elements of the SFCR that are not subject to audit comprise:

- The following elements of template S.17.01.02
- Rows R0290 to R0310 Amount of transitional measure on technical provisions
- Elements of the Narrative Disclosures subject to audit identified as 'unaudited'.

A. Business and performance

A.1 Business details and group structure

A.1.1 Name and legal form of the company

The Baptist Insurance Company PLC is a public limited company incorporated and domiciled in the United Kingdom.

The address of the registered office is:

Beaufort House Brunswick Road Gloucester GL1 1JZ

A.1.2 Supervisory authority

The supervisory authority for the Company is:

Prudential Regulation Authority (PRA)
Bank of England
20 Moorgate
London
EC2R 6DA

A.1.3 External auditor

The external auditor for the Company is:

Deloitte LLP Hill House 1 Little New St London EC4A 3TR

A.1.4 Qualifying holdings

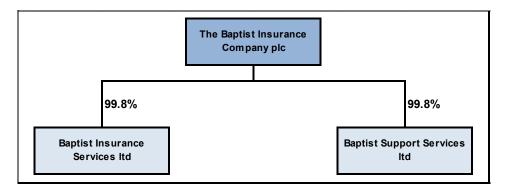
The Company has issued 28,284 five percent cumulative ordinary shares of £5 each. These are held by a number of Baptist related organisations and private individuals. Qualifying holdings are as follows:

- The Central Baptist Association which holds 3,205 shares equating to 11.331% of the voting rights of the share class.
- Eastern Baptist Association which holds 3,204 shares equating to 11.328% of the voting rights of the share class.

In addition, 1,286 four percent cumulative preference shares of £5 each have been issued. There are no qualifying holdings within this share class.

A.1.5 Group structure

Below is a graphical representation of the group structure and the Company's position within the group:



Both subsidiaries of the Company are incorporated in England and Wales, and are dormant, having not traded since incorporation. The Company holds 998 of the 1,000 ordinary shares of each subsidiary. The remaining shares are held by the directors of the subsidiary as nominees, who are also directors of the Company.

A.1.6 Lines of business

The principal lines of business of the Company are:

- Fire and other damage to property
- General liability

The Company provides insurance and risk management advice for churches, as well as offering home insurance for Baptist Ministers, church volunteers and church members within the United Kingdom.

A.1.7 Significant events

As noted in the prior year the result of the European Union (EU) referendum created volatility in investment markets and considerable political and economic uncertainty and this is likely to continue now that article 50 has been triggered and the format of the exit conditions evolve.

As the Company's underwriting business is undertaken within the United Kingdom, the impact of 'Brexit' on the insurance operations of the Company is expected to be negligible.

A.2 Performance from underwriting activities

A.2.1 Overall underwriting performance

The underwriting performance for the year was a profit of £115k (2016: £96k). This is following a growth in Gross written premium (GWP) which has been generated through the indexation of sums insured.

Despite the UK experiencing benign weather during the year claims experience performance has seen a deterioration in both the current and prior loss years compared to 2016. Run-off claims have seen a strengthening of reserves following the uncertainty that remains around the nature of these claims.

Corporate expenses have seen a small increase on prior year, due to an increase in audit fees following the company now coming under the regulation of a Public Interest Entity.

A.2.2 Performance by material class of business and by geographical region

Description	Property		Liability	
	2017 £'000	2016 £'000	2017 £'000	2016 £'000
Gross Written Premium	3,238	3,184	296	289
Gross Earned Premium	3,221	3,172	295	282
Gross Incurred Claims Reinsured Run-off	(691) (691)	(583) (583)	(604) (478) (127)	(769) (453) (316)
Commission	(15)	(11)	(2)	(2)
Expenses	(97)	(84)	(9)	(8)
Gross Underwriting result	2,418	2,494	(320)	(496)
Reinsurance Earned Premium	(3,221)	(3,172)	(295)	(282)
Reinsurance Claims	691	899	332	163
Reinsurance Commission	501	486	2	2
Net Underwriting result	389	707	(281)	(614)

Property

The property account experienced conditions roughly the same as prior year, with relatively low attritional claims, as the UK continued to experience relatively benign weather. However, the account did experience an increase in large claim notifications, with this being the key driver for the increase in claims. Overall the account saw an adverse development on both current and prior loss years compared to 2016.

Liability

The liability account has seen an improvement on prior year but continues to make a loss. This has been from a combination of an increase in GWP, following the decision to apply a small increase for liability premium and indexation, and a smaller addition in reserves for run-off claims.

Run-off claims are historic liability claims including physical and sexual abuse (PSA) claims. These are reviewed annually, taking into consideration a number of factors including uncertainty. The result of the 2017 review was a strengthening of reserves which have been netted off by an unexpected recovery. This has resulted in an overall charge of £127k for the current year (2016: £316k).

The Company only underwrites business in the UK and therefore an analysis by geographical region has not been provided.

A.3 Performance from investment activities

A.3.1 Investment performance by asset class

Investment performance	2017 £'000	2016 £'000	Inc/(Dec)
OEIC Income Bank Interest	170 0	183 2	(13) (2)
Total Income	170	185	(15)
Realised Gains / (Losses) On Investments Unrealised Gains / (Losses) On Investments	80 256	284 20	(204) 236
Total investment return	506	489	16
Instalment Handling Fees Investment Expenses & Charges	32 0	31 (1)	1 1
Net Investment return	537	519	18

Total income for the year was £170k, a 7.5% decrease on the prior year. This consists of Open Ended Investment Company (OEIC) income of £170k received during the year which has seen a decrease following the timing of two disposals and the subsequent reinvestment of funds. Bank interest has reduced from prior year following funds being invested in OEICs, reducing the balance on which interest is earned.

During 2017, there have been movements between several OEIC holdings resulting in realised gains of £80k compared to £284k in 2016.

Instalment handling fees, which relate to policies that are settled in instalments rather than in full, have remained at a similar level to 2016.

The Company's investment consists wholly of OEIC's and the mix of underlying investments were as follows;

Investment Mix*	2017	2016	Inc/(Dec)
	£'000	£'000	£'000
Debt	3,315	3,177	138
UK Equities	1,314	1,570	(257)
Overseas Equities	1,609	667	942
Cash	125	100	25
Fair Value	6,362	5,513	849

^{*} Based on the fair value at the year end position

The investment performance in 2017 has benefitted from the strong performance of the UK stock market. Additionally, investment holdings continued to benefit from the weak position of sterling, which has been compounded by an increase in the proportion of overseas equities held indirectly through the OEICs. This has resulted in unrealised gains of £256k compared to £20k seen in 2016, resulting in an overall £236k favourable movement from prior year.

A.3.2 Gains and losses recognised directly in equity

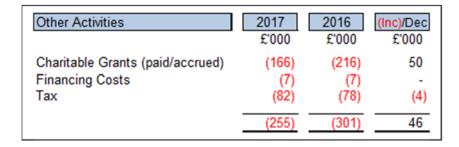
The Company has not recognised any gains or losses directly in equity in either the current or previous reporting period.

A.3.3 Investments in securitisation

The Company does not hold any investments in securitisation.

A.4 Performance from other activities

A.4.1 Other Activities



Charitable Grants

Following a continuation of the strong operating performance, the Company provided £166k in charity grants in support of the Baptist Community.

Financing Costs

Financing costs comprise fixed interest preference shares at 4% and ordinary shares at 5%, this remains unchanged year on year.

Tax

The Company had a tax charge of £82k following a profitable year compared to a £78k charge for 2016. A change in the UK standard rate of corporation tax from 20% to 19% became effective from 1 April 2017. Tax has been provided at a blended rate of 19.25% for the current year and a rate of 20% for the prior year.

A.5 Any other information

There is no other material information regarding the performance of the Company.

B. System of governance

B.1 General information on the system of governance

B.1.1 Governing Body – Roles and segregation of responsibilities

Composition and Independence

The Company is governed by a Board of Directors comprising a Non-executive Chairman and seven Non-executive directors (NEDs) including an Administrator Director.

The Role of the Administrator – outsourcing arrangements

The arrangements for the provision of management and administration services to the Company by an outsourced provider, the Administrator, are set out in the Joint Administrative Agreement (JAA). In accordance with the Company's Articles of Association an Administrator Director, who is an employee of the Administrator, has been appointed to the Board. Authority is delegated by the Board for the sound management of the Company's day to day business.

Appointment of Non-executive Directors

Apart from the Administrator Director the NEDs of the Company are appointed as either Ordinary Directors or Baptist Union Directors, as permitted in the Company's Articles of Association. The Company believes the size and composition of the Board gives it sufficient independence, balance and depth of professional experience to consider the issues of strategy, performance, resources and standards of conduct.

The Board continually reviews the appropriateness of the Directors through the use of annual Board evaluations, and review of Directors' training and development needs.

Key roles and responsibilities

The Board retains responsibility for ultimate supervision and control of the Company, and is responsible for ensuring compliance of the outsourcing services and reinsurance agreement and all of its regulatory requirements and obligations.

The Board is responsible to the Company's shareholders for the long-term success of the Company, its strategy, values and its governance. Great importance is placed on a well-informed and decisive Board, and Board meetings are scheduled and held regularly throughout the year.

A Board Charter has been developed which establishes a framework for the conduct of the Board and its committees with clear guidelines as to its responsibilities, the expected standard of behaviour, and best practice in fulfilling its obligations to the Company. The Board is responsible for: culture and values; strategy and direction; leadership and organisation; governance; risk management and controls; and financial expectations and performance.

In addition, a formal schedule of matters reserved for the Board is in place and includes strategy and management; structure and capital; financial reporting and controls, risk management; internal controls; contracts; communication; board membership and other appointments; remuneration; delegation of authority and corporate governance and policies.

All Directors are expected to take decisions objectively in the interests of the Company, consistent with their legal and statutory duties, commensurate with their knowledge, experience and skills.

Segregation of Responsibilities

The approach to segregation and delegation of responsibilities is set out in the Company's governance framework, which demonstrates the high standards of compliance and corporate governance adopted and followed. The framework establishes appropriate procedures, systems and controls to allow Directors to discharge their duties and obligations effectively. It sets clear expectations for all operations in terms of their strategy, governance, performance, risk parameters and controls to protect the interest of the Company's stakeholders.

Segregation of responsibilities is an important internal control, which helps ensure that no one individual has unfettered powers of decision. By selectively delegating authority and certain functions to various individuals and committees, the Board does not absolve itself of its own responsibilities.

Chairman

The Chairman is responsible for:

- The active leadership of the Board, ensuring its effectiveness in all aspects of its role;
- Maintaining an appropriate balance on the Board regarding skills, knowledge, experience and diversity;
- Ensuring that all relevant issues are on the Board agenda, that directors receive all appropriate documentation in a timely manner, are enabled and encouraged to play their full part in relevant discussions and debate and that the management team are both supported and challenged;
- Through Board committees, ensuring that the management team is adequately resourced and that there are succession plans in place for all directors; and
- Ensuring that the General Manager is working to clear objectives and that their performance and the Board's performance is effectively monitored.

The Chairman is expected to demonstrate the highest standards of integrity and probity, and set clear expectations concerning the company's culture, values and behaviours, and the style and tone of board discussions. This includes acting as both internal and external ambassador of the Company.

Deputy Chairman

In addition to their other duties as a NED, the Deputy Chairman is responsible for:

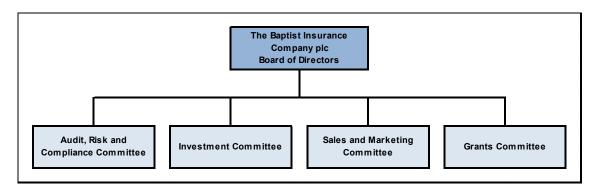
- Acting as a sounding board for the Chairman;
- Providing support for the Chairman in the delivery of their objectives;
- Leading the evaluation of the Chairman;
- Acting as an intermediary for the other Directors where necessary; and
- Being available to shareholders if they have concerns about the running of the Company that have not been resolved.

Non-Executive Directors

NEDs have a responsibility to uphold high standards of integrity and probity. They should constructively challenge and help develop proposals on strategy and have the same responsibilities and liabilities under legislation and case law as Executive Directors.

B.1.2 Delegation to committees

The Board has established four committees which support the discharge of its duties. Each committee has agreed terms of reference which sets out requirements for membership, meeting administration, committee responsibilities and reporting.



The Board has delegated certain responsibilities to the board committees. Each committee has individual responsibilities, as detailed in their Terms of Reference, which provide delegations of authority and effective reporting structures to the Board. All committees are required to formally report back to the Board on its proceedings after each meeting on all matters within its duties and responsibilities.

A high level overview of each committee's delegated responsibilities are summarised below:

Audit, Risk and Compliance Committee (AR&CC)

Its responsibilities include:

- Overseeing the Company's financial reporting processes;
- Reviewing the effectiveness of the outsourced internal audit, financial, risk and compliance functions;
- Managing the relationship with the external auditor; and
- Monitoring the regulatory capital position of the Company

The committee members have been selected with the aim of providing the relevant financial, insurance, actuarial and commercial expertise necessary to fulfil the committee's duties.

Investment Committee (IC)

The overall management of the Company's investments is delegated to the IC. On recommendation from the committee, the Board set the overall investment strategy with regard to risk appetite, geopolitical factors, ethical investments, mix of investments, solvency and cash flow requirements and then instructs the fund managers accordingly.

Sales and Marketing Committee

Its main purposes are:

- To consider and recommend a sales and marketing strategy;
- · Consider distribution strategies other than direct sales;
- Review the overall church market;
- · Review monthly business reports; and

Review claims and underwriting performance that facilitate the achievement of the Company's
objectives as set out in the Company's Own Risk and Solvency Assessment Report (ORSA) and
the three year business plan, and to ensure that the strategy is being correctly implemented by
management.

The committee also assists in the development of new products, and advertising and distribution channels, and will consider new schemes to enhance the Company's business.

Grants Committee

Its role is to:

- Solicit and assess grant applications for suitability of grant support;
- Recommend grant distributions to the Board in conjunction with the grant budget proposed by the AR&CC and subsequently agreed by the Board; and
- Monitor the effectiveness of grants made.

In addition to meetings of the committee, meetings are arranged by the committee members to meet with potential or current grant recipients.

B.1.3 Roles and responsibilities of key functions

The following key functions are outsourced to the Administrator, as part of the JAA;

General Manager

The General Manager, who is the Administrator Director and fulfils the Senior Insurance Managers Regime (SIMR) function of Chief Executive, is an employee of the Administrator and their responsibilities include:

- The delivery of, and reporting to the Board on, the implementation and execution of the Company's strategy;
- Developing and managing the relationship with key stakeholders including regulators, customers and shareholders;
- Establishing a framework and ensuring the maintenance of a sound system of internal control and risk management and regularly reporting to the Board on its effectiveness;
- Establishing a clear set of key performance indicators and key risk indicators within which to monitor progress and where necessary take remedial action; and
- Maintain effective open communication with senior insurance managers and NEDs.

Chief Financial Officer (CFO)

The Chief Financial Officer is an employee of the Administrator and fulfils the SIMR function of Chief Financial Officer and their responsibilities include;

- Management of the financial resources of the Company and reporting to the Board in relation to its financial affairs;
- Formulating and evaluating the short- and long- term financial objectives and strategy of the Company;
- Providing oversight of supply chain management;
- Minimising and managing financial risk exposure through the implementation of suitable internal controls; and

Ensuring compliance with applicable regulatory, financial and tax obligations.

Compliance Function

The Administrator's compliance function provides assurance to the Board that the Company remains compliant with its obligations under the regulatory system and for countering the risk that the Company might be used to further financial crime. It ensures that appropriate mechanisms exist to identify, assess and act upon new and emerging regulatory obligations and compliance risks that may impact the Company.

Internal Audit Function

The Administrator's internal audit function (AIA) derives its authority in respect of the requirements of the Company from the AR&CC. AIA provides objective assurance to the Board, in respect of general insurance risk and associated operational risk that the governance processes, management of risk and systems of internal control of the Administrator are adequate and effective to mitigate the most significant general insurance related risks to the Company. The Administrator's Director of Group Internal Audit regularly reports to the AR&CC.

Risk Function

The Administrator's risk function derives its authority from the ARC and provides oversight of the prudent management of risk including financial, operational and conduct risk. The Administrator's Chief Risk Officer (CRO) is accountable to the AR&CC.

Actuarial Function

The Administrator's actuarial function is accountable for all aspects of capital modelling, pricing and reserving for the Company and the independent actuarial function is responsible for providing opinions on the effectiveness of technical provision calculations, underwriting and pricing and reinsurance purchase.

The key functions outsourced to the Administrator ensure the consistent implementation of systems and procedures across the Company. All individuals are required to report regularly to the Board or the relevant sub-Committee of the Board.

B.1.4 Material changes in the system of governance

There have been no material changes in the system of governance during the year.

B.1.5 Assessment of the adequacy of the system of governance

The Board is ultimately responsible for the system of governance and believes that the affairs of the Company should be conducted in accordance with best business practice. Accordingly, a governance framework has been developed to ensure that the Company operates to high ethical values. The governance model adopted by the Company ensures oversight of all risk and governance operations. The governance framework ensures that the Board is delivering long term value for its shareholder whilst discharging its duties effectively, and maintaining a focus on an appropriate culture aimed at delivering the right outcomes for the Baptist Community and its customers.

The governance framework is formally reviewed and approved by the Board every two years and was last approved in October 2016.

The Joint Administrative Agreement (JAA) ensures that all operational and management services are provided by the Administrator, and the Reinsurance Agreement ensures that all risks underwritten by the Company are 100% reinsured by the Administrator with the exception of eligible terrorism above a minimum retention and flood risks, which are reinsured by Pool Re and Flood Re respectively. The Board continually reviews the adequacy and effectiveness of the outsourced arrangement with the Administrator through its annual Board Evaluation and private strategic discussions. The Chairman of the Board meets annually with the Chief Executive Officer of the Administrator.

The Board, through the Audit Risk and Compliance Committee (AR&CC), regularly reviews the adequacy of the system of governance on a general basis and has concluded that it is appropriate and effective based on the nature, scale and complexity of the risks inherent in the business. The effectiveness of the system of governance is considered through the receipt of the following:

- The ORSA Report;
- Management accounts with full underwriting, claims and investment analyses;
- Internal audit report findings;
- Compliance report findings;
- Compliance with the schedule of services outlined in the JAA;
- Compliance with the governance framework and associated governance documentation;
- · Monthly business reports; and
- Reports from the Administrator's nominated key function holders.

B.1.6 Remuneration policy

The Company has no direct employees and the only remuneration payments made are to the NEDs who are remunerated by fixed fees with no element of their remuneration linked to financial performance of the Company.

Fees are set in relation to the skills, experience and capabilities needed to provide a balanced professionally qualified Board in all the required technical disciplines, currently covering financial, actuarial, insurance and general management. All Directors have very senior level experience in a range of professional backgrounds suited to the requirements of the Board's balance of skills.

Fees are relatively low for a Company of this complexity and size as it was established to serve the insurance needs of the Baptist community and there is a balance between payment for the professional services provided by the Directors and a willingness to serve the needs of the Baptist Community as part of their giving to the Christian denomination.

Fees are benchmarked against similar organisations on a 3 to 5 year basis with small inflationary increases in between. Each time a recruitment exercise is undertaken for new Directors the recruitment consultancy appointed is also tasked to provide market feedback on fee levels.

B.1.7 Entitlement to share options, shares or variable components of remuneration

The Company has no staff and the Directors have no entitlement to share options, shares or variable components of remuneration in respect of the Company.

B.1.8 Supplementary pension or early retirement schemes for the members of the board and other key function holders

The Company has no staff and the Directors and other key function holders have no entitlement to supplementary pension or early retirement schemes in respect of the Company.

B.1.9 Material transactions during the reporting period with shareholders, persons who exercise a significant influence, and with members of the board

No contract of significance subsisted during or at the end of the financial year in which a director was or is materially interested.

B.2 Fit and proper requirements

B.2.1 Skills, knowledge and expertise requirements

The recruitment of Directors is normally undertaken by using an external recruitment consultant with a brief written by the Chair or Committee Chair depending on the position to be filled – a skill balance is sought across the Board with skills from accounting, actuarial, insurance and general business being the key criteria.

Candidates proposed from the selection process are interviewed by two Directors with references taken from employers, past employers and Church leaders as the business is largely written within the Baptist market.

Fitness to fulfil the role is assessed through the process and also through post appointment peer review and annual Board effectiveness reviews.

B.2.2 Ensuring ongoing fitness and propriety

In order to determine fitness and propriety of all senior roles including key function holders within the Company persons are subject to a competency based interview following an analysis of their CV.

The competency based interview is intended to explore the candidates experience and qualifications and for a key function holder would as appropriate explore:

- Market knowledge
- Business strategy
- Financial analysis
- Governance
- Oversight and controls
- Regulatory framework

Criminal record checks (DBS) and sanctions checks are carried out for each person in qualifying honesty, integrity and reputation along with a credit check to assist in verifying financial soundness. The Company will also check the Financial Conduct Authority register where persons have previously been a key function holder to check that no disciplinary actions have occurred against them. References are also taken from previous employers. For very senior positions two further interviews may be conducted, one through the Administrator's HR department and another by a subject matter expert.

For specialist key functions the Company's minimum requirement would be that all successful applicants are educated to graduate level or equivalent and a professional qualification relevant to a particular discipline.

Continued professional development is undertaken by all directors and the Board undertakes an independent peer review of competency and skill which is facilitated by the legal and secretarial department of the Administrator on an annual basis.

Individual contribution to Committee and Board meetings is monitored by the Chair with appropriate action taken in the event of poor performance.

The fitness and propriety process for assessing Key Function Holders (KFH's) mirrors the above approach to SIMF and control function (CF) Functions. The one exception to the process for KFH's is that regulatory pre-approval is not required but a suitable notification is forwarded to the regulator for review.

B.3 Risk management system including the ORSA

B.3.1 Overview of the risk management system

The Company has outsourced the day to day operation of its business to the Administrator under the JAA. Day to day risk management in conjunction with the activities specified under the JAA is carried out within the Administrator's risk management framework but reflecting the Company's Board approved risk appetite, register and analysis of risk. This comprises the strategies, objectives, policies, guidelines and methodologies needed to ensure that the business is operated on the Company's behalf in line with its expectations, regulatory requirements and commensurate with its own appetite for risk taking. The JAA is the key document which sets out the Board's requirements and expectations of the Administrator.

An effectively operating risk management framework is vital in supporting and promoting the successful and responsible performance of the Company.

B.3.2 Effectiveness of identifying and managing risks

The ARC has delegated responsibility from the Board for reviewing the effectiveness of all aspects of the risk management framework including identification and management of risks and receives regular reports from the respective areas of the Administrator.

The Board receives regular reports from the ARC to ensure that all aspects of the risk management system are robust. Furthermore, as part of their review of the ORSA process and approval of the ORSA document the Board satisfies itself of the effectiveness of identifying and managing all risks faced by the Company.

Each year the ARC provides a report to the Board on the effectiveness of the overall governance arrangements and in particular the outsourcing agreement together with recommendations for improvement should this be necessary.

B.3.3 Implementation of the risk management function

The JAA formalises the outsourcing arrangement in place with the Administrator who adopt a Three Lines of Defence model to ensure the successful operation of its risk management process. This operates as follows:

- 1st Line (Business management) is responsible for strategy execution, performance identification and management of risks and the application of appropriate controls;
- 2nd Line (Reporting, oversight and guidance) is responsible for assisting the CRO and the Company's Board to formulate risk appetite, establish minimum standards, appropriate reporting, oversight and challenge of risk profiles and risk management activities within each of business units. and the
- 3rd Line (Assurance) provides independent and objective assurance of the effectiveness of the systems of internal control.

The first line of defence consists of the day to day management and operation of the business and requires that those responsible for this are also responsible for ensuring that a risk and control environment is established as part of day-to-day operations and for delivering strategy and optimising business performance within an agreed risk and governance framework.

Under current arrangements, the majority of first line activity is outsourced to the Administrator. However; the Board is ultimately responsible for the governance and sound and prudent management of the Company. The Board, in fulfilling its functions and objectives, must therefore ensure that the Administrator, its outsourcing partner, has a robust risk and governance framework which includes policies, systems and controls.

The second line of defence comprises the risk and compliance functions of the Administrator and the Board's ARC. This provides a framework of governance and risk oversight, and monitors and challenges the first line of defence. The second line also provides the business with the necessary training, tools and techniques to manage risk and establish internal controls in an effective way.

The third line of defence is independent and objective assurance of the effectiveness of the Company's systems of internal control. This activity principally comprises the Administrator's internal audit function which provides regular reporting to the ARC, but also extends to external audit.

There are a number of key roles and responsibilities with regards to the effective implementation and operation of the overall Risk Management Framework:

The Company Board

The Board are responsible for determining strategy and direction in line with its appetite for risk and satisfying themselves on the integrity of financial information and that financial controls and systems of risk management are robust and defensible. The Board must also satisfy themselves that the ORSA process has been followed and managed effectively.

Audit Risk and Compliance Committee

The Board has delegated responsibility for risk management and internal control to the ARC. They are responsible for reviewing the effectiveness of the Company's financial reporting and internal control policies and procedures for the identification, assessment, reporting and management of risks and assessing the scope and effectiveness of the systems established by management to identify, assess, manage and monitor financial and non-financial risks. The ARC recommends the risk appetite to the Board.

Investment Committee

The Board has delegated responsibility for oversight on the Company's investments and associated risk to the Investment Committee (IC). They are responsible for ensuring that the Company operates an investment strategy that is appropriate to the Company's ethics, performance, risk profile and capital management of the business as defined in its statement of investment principles based on its risk appetite and as articulated in the Company's investment policy.

General Manager and the Administrator's operational areas (1st Line of Defence)

These areas are responsible for ensuring that there is an ongoing process for the identification, assessment, management and reporting of the significant risks during the course of business operations.

The Administrator's risk function (2nd line of defence)

The risk function facilitates the management and ongoing effectiveness of the risk management framework by providing tools, training and support so stakeholders can effectively discharge their responsibilities. The risk function facilitates the Board risk identification and assessment process and provides guidance to the Board when determining the risk appetite.

The Administrator's internal audit function (3rd line of defence)

AIA provides a third line independent opinion over the adequacy and effectiveness of the risk management framework.

A key component of the governance of the Company is a policy framework covering all important elements of managing the Company's business. This contains a set of four overarching policies, each with more detailed policies below.

This policy framework is communicated to those persons within The Administrator who administer the Company's business under the JAA and provides clarity around the risk management expectations of the Board in all aspects of the operations and support adherence to the Company's risk appetite and risk management principles. The policy framework contains specific policies that provide high level guidance around the company's risk-accepting expectations with respect to:

- Insurance Risk
- Financial Risks
- Operational Risks
- Strategic Risks

B.3.4 Own risk and solvency assessment process

The ORSA assesses all risks in the business, outlines the current solvency position, the business plan for the next three years, summarises the stress testing and scenario analysis undertaken in conjunction with the business plan and projects the solvency position over the planning period. This ensures that business strategy and plans are formulated and signed off by the Board with full recognition of the Company's risk profile and future capital requirements.

The Company has delegated the production of the ORSA to the Administrator under the terms of the outsourcing agreement. The report is reviewed in detail by the ARC and approved by Board, who maintain responsibility for conducting the ORSA and are the ultimate owner and fully involved in the key processes, providing challenge and steer. This process integrates the Company's risk management, business planning and capital management activities. Key steps in the process are:

- Review of the risks on the risk register
- Identification any new and emerging risks
- · Quantification of the risks identified
- Calculation of the capital requirements
- Undertaking stress and scenario tests
- Comparison to the risk appetite
- Projection of the capital and solvency requirements
- Preparation of the ORSA report
- Obtaining an independent review of the process and findings
- Submit the findings for Board review

B.3.5 Frequency of review

The ORSA is an ongoing process that operates on an annual cycle with a report being signed off by the Board each year. Regular updating of the key elements is undertaken throughout the year and changes to the risk profile and business plans quantified.

B.3.6 Determination of own solvency needs

The Board and ARC assess the various risk elements of the business covering credit, operational, underwriting, reserving and investment risk and makes a calculation of the capital requirements arising from those risk elements. Guidance and advice is taken from the CFO, CRO, actuarial and finance teams of the Administrator as well as the ARC where detailed analysis is undertaken utilising those technical and professional feeds. Insurance risk is covered by the reserving and underwriting assessments carried out on a regular basis by the operational teams.

All aspects of capital management are contained within the Board approved Capital Management Policy. Responsibility for setting objectives and policies relating to own funds rests with the Board. Responsibility for implementing objectives and policies rests with the ARC through delegation from the Board. Day-to-day management at operational level is outsourced to the Administrator through the JAA.

As such the day-to-day management, compilation of reporting, interaction with risk management systems and stress testing is all carried out by the Administrator under the JAA. Detailed reporting of all aspects of solvency and capital management are reported to the ARC for detailed review prior to recommendation to the Board for approval

The ARC and Board receive the underwriting accounts monthly and the full management accounting package quarterly. The former provides detail on the underwriting performance and profit commission earned. The latter provides a comprehensive pack including Income Statement, Balance Sheet and Solvency Statement. The Solvency Statement incorporates scenario testing for significant falls in the UK equity share index (FTSE) and for the £/Euro exchange rate falling to parity. Should a significant market trigger event occur then additional, more frequent reporting would be implemented.

It is the overall policy of the Board to ensure that there is always adequate capital to meet current and future projected requirements from the planning process and to satisfy regulatory requirements. An additional buffer is also maintained above the minimum regulatory requirement in accordance with the Board's risk appetite to cover any possible unforeseen events.

B.4 Internal control system

B.4.1 Internal control system

The Internal control system is implemented by the Board and General Manager, to ensure that the Company is managed efficiently and effectively.

The Board has established appropriate Board level policies and a risk appetite. As the day to day operation of the business has been outsourced to the Administrator the business is managed within its own internal control system in accordance with the Board's requirements which are detailed within the JAA. The Board monitors the performance of the Administrator and the internal control system on an ongoing basis.

The Control Framework of the business managed by the Administrator comprises the following elements:

- Control Environment: A business culture that recognises the importance of systems of control
 and management to ensure the resources and environment is adequate to operate the control
 framework:
- Control Standards: a policy framework that establishes the Board's minimum standards for the mitigation of risk within the stated appetite;
- Control Activities: business processes that include control activities designed to mitigate risks to the level required to meet the control objectives;
- Monitoring Activities: regular monitoring of controls according to their materiality;
- Training and Communication: effective communication of required control standards and adequate training to ensure those operating or monitoring controls can do so effectively;
- Recording: clear documentation of controls to enable the ongoing operation; and
- Reporting: reporting of material control effectiveness to allow relevant management or the Board to determine whether objectives are being met or whether action is required to strengthen the control environment.

B.4.2 Compliance function

The Company outsources the provision of compliance services to the Administrator's Compliance function under the terms of the JAA. This function sits in the second line of the firms three lines of defence governance system and is responsible for:

- identifying, assessing, monitoring and reporting on the Company's compliance risk exposures;
- assessing possible impact of legal and regulatory change and monitoring the appropriateness of compliance procedures; and
- assisting, supporting and advising the Company in fulfilling its responsibilities to manage compliance risks.

In order to ensure adequate risk control for the Company within their outsourcing arrangement Compliance applies the principles of the Administrator's Compliance Charter. This sets out the activities and responsibilities of Compliance and those policies where it has delegated responsibilities.

The Charter also sets out the compliance function's objectives and their key performance measures. Compliance gains its authority from the ARC and the Administrator's Compliance Director is accountable to the Chairman of that Committee.

B.5 Internal audit function

B.5.1 Implementation of the internal audit function

AIA is authorised by the Administrator's Group Audit Committee (GAC) to evaluate and report on the adequacy and effectiveness of all controls, including financial, operating, compliance, and risk management. To avoid any conflicts of interest AIA reports its findings first and foremost to the Administrator's GAC and thereafter to the ARC, reporting on all relevant information pertaining to the Company.

Adequate and effective risk management, internal control, and governance processes reduce but cannot eliminate the possibility of poor judgement in decision making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances. Adequate and effective risk management, internal control, and

governance processes within the scope of the JAA will therefore provide reasonable, but not absolute, assurance that the Company will not be hindered in achieving its business objectives, or in the orderly and legitimate conduct of its business.

AIA maintains a professional audit team with sufficient knowledge, skills, experience and professional qualifications. Where specialist, technical support is necessary to supplement AIA resource, this is available through a co-sourcing contract with an external specialist provider, ensuring that AIA has immediate access to specialist skills where required. AIA confirms to the ARC that the International Standards for the Professional Practice of Internal Auditing of the Chartered Institute of Internal Audits are complied with.

AIA operate within the Administrator's three lines of defence model which has been adopted by the Company. In order to operate an effective framework AIA maintain regular and ongoing dialogue with the first and second line to maintain a current and timely perspective of business direction and issues.

Demarcation between the third line of defence and the first two lines must be preserved to enable AIA to provide an independent overview on the effectiveness of all risk management and assurance processes in the organisation.

B.5.2 Independence of the internal audit function

To provide for the independence of AIA, the Administrator's Director of Group Internal Audit is accountable to the Administrator's GAC Chairman and reports on the operation of general insurance controls to the ARC.

Financial independence, essential to the effectiveness of internal auditing, is provided by the Administrator approving a budget to enable AIA to meet the requirements of its Charter.

AIA is functionally independent of the activities audited and the day-to-day internal control processes of the Company and shall be able to conduct an assignment on its own initiative, with free and unfettered access to people and information, in respect of any relevant department, establishment or function of the organisation covered by the JAA.

The Administrator's Director of Group Internal Audit and staff of AIA are not authorised to perform any operational duties for the Company or the Administrator or direct the activities of any employee not employed by AIA.

Persons transferred to or temporarily engaged by AIA are not assigned to audit those activities they previously performed until at least one year has elapsed. Furthermore, the demarcation between the third line of defence and the first two lines must be preserved to enable AIA to provide an independent overview to the Board on the effectiveness of all risk management and assurance processes in the organisation.

B.6 Actuarial function

B.6.1 Implementation of actuarial function

The Company outsources the provision of actuarial services to the Administrator's actuarial function under the terms of the JAA. The actuarial function is headed by the Administrator's Actuarial Function Director, who is an experienced qualified actuary, holding an Institute of Actuaries Chief Actuary certificate, accountable for the delivery of the Actuarial Function's objectives. The Actuarial Function

resides within the Group Finance area of the Administrator, and as such reports to the Administrator's Group Chief Financial Officer. The Actuarial Function Director uses other actuarial and appropriately experienced resources to discharge his responsibilities, ensuring an appropriate level of independence between those carrying out activities and those reviewing work.

The Actuarial Function's key areas of responsibility are:

- To provide oversight and co-ordinate the calculation of the technical provisions, ensuring appropriateness of data, assumptions, methodologies and underlying models used
- To give an opinion on the technical provisions to the Board, including assessing the sufficiency and quality of the data used, informing the Board of the reliability and adequacy of the calculation and comparing best estimates to experience
- To give an opinion on the adequacy of pricing and underwriting to the Board
- To give an opinion on the adequacy of reinsurance arrangements to the Board as an efficient means to manage risk
- To contribute to the effective implementation of the risk management system.

B.7 Outsourcing

B.7.1 Outsourcing policy

The Company has a Procurement, Purchasing and Outsourcing Policy that has been agreed by the Board and forms part of the Policy Framework. The policy covers all procurement activities and material outsourcing arrangements.

The Company's policy is to operate an effective framework for awarding contracts to achieve a quality provision giving consideration to the expected impact on customers. Elements of the policy implementation are outsourced to the Administrator under the terms of the JAA. The Board remain ultimately responsible for the policy ownership and implementation.

The Board is responsible for making all strategic decisions regarding outsourcing in the context of their key objectives and the company's policy on outsourcing includes the following:

- Ensure compliance with all regulatory obligations and good market practice in the selection, management and termination of suppliers.
- Optimise the choice, loyalty and performance of suppliers and business partners to deliver cost effective goods and services and service enhancing solutions across the business.
- Ensure that suppliers uphold the Company's corporate values and high standards of compliance.
- Provide for the mitigation of operational and financial risks related to outsourcing and procurement activities.
- Ensure effective identification, authorisation and management of material outsourced contracts as defined and in accordance with regulatory requirements.
- Not to delegate responsibility and oversight to the supplier where outsourcing arrangements are
 put in place through clear non-executive ownership and regular reporting on contract
 performance to ensure visible and demonstrable management ownership of key risks.

A defined framework and detailed processes are in place for the appointment of new contracting parties. This involves:

- The preparation of a detailed specification and risk assessment before inviting tenders;
- A critical assessment of the capacity and ability of shortlisted suppliers;
- Completion of a business continuity and information security practices questionnaire by all potential providers; and
- An assessment of these against risk appetite.

Comprehensive written contracts are entered into with accountability for managing the delivery against the contract being clearly assigned. Exit and contingency plans are documented as part of the selection and appointment process.

The Board only enters into outsourcing arrangements after conducting detailed financial, operational and professional due diligence into the outsourcing body in line with the outsourcing policy. Outsourcing is only undertaken where the range of skills available in the outsourcing partner is complementary to those of the Company and more cost effective to be provided from external sources.

B.7.2 Outsourcing of critical or important functions or activities

There are six contracting parties appointed to deliver critical outsourced services:

- One for the management and administration of insurance activities;
- Three for custodian and investment administration services; and
- Two for insurance claims handling and specialist service provisions for specific cover provided in some general insurance products.

The most significant outsourcing agreement is the JAA covering the administration of the Insurance business.

Monitoring of all the outsourcing arrangements is by regular Board review and benchmarking of the service providers against competitive tender.

All outsourced providers operate from within the United Kingdom. In turn, the Administrator contracts with third parties to deliver services which benefit the Company and all outsourced arrangements entered into by it are in line with its company policy.

B.8 Any other information

No other material information regarding the system of governance requires disclosure.

C. Risk profile

C.1 Underwriting risk

The most material elements of the Company's underwriting risk are:

- Reserving Risk the risk of adverse change in the value of insurance liabilities relating to
 outstanding claims from prior accident years, arising from differences in the timing and amount of
 claims settlements and related expenses from those assumed in the best estimate reserves;
- Premium Risk the risk that premiums relating to future accident years will be insufficient to
 cover all liabilities arising from that business including net of reinsurance non-catastrophe claims
 and expenses as a result of fluctuations in frequency and severity of claims, timing of claim
 settlements or adverse levels of expenses.

C.1.1 Underwriting risk exposure

The Company is exposed to risk at a gross level through the direct writing of mainly property exposures with associated liability exposures for predominantly church, commercial and household business.

Reserves are held in respect of long tail liability claims and as with claims of this nature, there is a high level of uncertainty associated with these reserves. The ARC receives regular reports on the financial performance of the business including details of adverse developments.

There were no material changes to the risk exposures over the reporting period.

C.1.2 Underwriting risk concentration

A key concentration for the business is the number of churches written and the impact on the Company should they be lost. This is an accepted risk as a niche insurer specifically set up for the insurance of these churches.

C.1.3 Underwriting risk mitigation

The key risk mitigant is the use of reinsurance. Since 1998 the business has been 100% reinsured with the Administrator except for a small element relating to terrorism and flood, which is reinsured with Pool Re and Flood Re respectively. The Company receives a profit commission based on the results of the business reinsured. The ARC is responsible for monitoring the performance and making recommendations to the Board based on the profit commission figures.

The ARC and Sales and Marketing committee receive audit reports prepared by the Administrator in relation to underwriting matters and require regular updates on the progress on actions to rectify any issues arising. These are covered within a schedule of the JAA.

The adequacy of the incurred but not reported (IBNR) provisions held is reviewed by the Administrator's Actuarial Reserving team quarterly following which a report is provided to the Board which provides information relating to the review of reserve adequacy.

C.1.4 Underwriting risk sensitivity

Separate stress tests have been carried out to assess the impact of a potential deterioration in the historic insurance liabilities and an ongoing rate reduction on existing business written.

The stress test assessing the reserves considers a sudden adverse development above and beyond existing claims reserves and assumes that no reinsurance attaches to the claims.

The stress test assessing the rate reduction considers a reduction over a 3 year period.

The results indicate that whilst there is an impact on the profits and capital strength, the company is well placed to withstand such adverse events in isolation and it did not raise material concerns over solvency or the ability to meet the company's internal risk appetite.

C.2 Market risk

Market risk is the risk that the Company is adversely affected by movements in the value of its financial assets arising from a change in interest rates, equity and property prices, credit spreads or foreign exchange rates.

C.2.1 Market risk exposure

The overall management of the Company's investments is delegated to the IC. The IC sets the overall investment strategy with regard to risk, return, liquidity and ethical requirements and then directs the Investment Managers to invest in specific funds or cash securities.

The Company has a Statement of Investment Principles (SIP), reviewed in November 2017, which sets out the principles of governing decisions around the Company's investments. The Governance document outlines principles related to risk including the consideration of the Company's MCR, volatility of Asset classes, Credit Ratings, Duration, Asset Allocation, Liquidity and the nature and term of the investments. The Principles are designed to limit the concentration of risk and mitigate overall investment risk.

Market risk is the most significant risk for the Company and this is largely due to the underlying exposure to equities held. However, during the year the demand for UK corporate bonds has continued due to low interest rates and improved corporate outlook. The resulting effect has been ever higher prices for corporate assets that may not be sustainable in the medium term.

C.2.2 Compliance with prudent person principle

The IC is made up of four suitably qualified persons and is accountable to the Board. The Committee monitor the performance and risk of the investments on a regular basis and meet formally at least four times a year to conduct a rolling review of all Investment and Treasury funds. The IC formally report to the Board and provide recommendations where appropriate.

The IC has an agreed formal Terms of Reference and is required to review the SIP at least annually.

The IC has delegated powers to monitor and challenge the Investment Manager or invest in individual funds subject to the agreed SIP. The company has an Investment mandate in place and also invests directly in OEIC funds that are structured to invest in other companies with the ability to adjust constantly its investment criteria and fund size.

The OEIC's are chosen for the collective characteristics of the assets in the fund and their geographical diversification. The IC regularly reviews the makeup and concentration of companies in the funds under investment. Where an Investment Mandate exists individual Investment valuations are received monthly and a detailed report sent quarterly.

C.2.3 Market risk concentration

The Company invests in OEIC's for the specific reason of diversification of credit risk. The Royal London Short Duration Credit Fund for example has investments in 256 companies as at 31 December 2017, with the largest holding accounting for 1.5% of the total OEIC value. In the equity based EdenTree UK B OIEC fund, the largest single holding is only 3.8% of the fund by value.

The Investment Manager regularly reviews and reports quarterly on the creditworthiness of each sector in the Credit funds and individual company performance in the collective funds. The Company also monitors the credit ratings /securitisation profile of assets in bond portfolios

The IC adheres to the asset allocation benchmarks as agreed in the SIP. Historically the most volatile asset class has been equity and the SIP limits investment in this asset class to 40% with a 5% tolerance.

C.2.4 Market risk mitigation

Investments are either held by a custodian bank or listed on the Stock market thus the Company has full title to the Assets. Where investments are made in cash deposits the bank's credit ratings are viewed by the committee and diversification is considered at all times. In addition the IC has formal agreements and set procedures for withdrawing funds / switching investments with the Investment Managers.

The IC regularly considers changes in the macro and political environment and implements risk reduction programs when appropriate. The IC also considers diversification in terms of geographical spread, sector and number of investments.

The SIP provides a policy benchmark for each asset class designed to limit market risk e.g Equity type investments will not be more than 40% (tolerance plus 5%) of portfolio value as the Long Term Asset Allocation. The IC monitors movements in each of the Asset Classes and look for sustainable trends in financial markets and the environment as part the risk mitigation strategy

No mitigation against equity, currency or interest rate risk is undertaken by way of hedging or derivatives.

C.2.5 Market risk sensitivity

Stress tests have been carried out to assess the ability of the Company to withstand shock events.

The first stress test assumes a 30% fall in the Company's equity-based investments in 2017, with no gains or losses on the interest-bearing securities, to simulate a stock market crash. The stress test generated a pre-tax loss in the year of the crash with recovery in the following years.

The second stress test combined the impact of a 10% decrease in the stock market combined with an increase in post-1998 net claims costs on an annual basis over the plan period. This combination of events was intended to demonstrate the impact of a situation that generates a surge in claims at the same time as a prolonged drop in investments. This had an extreme impact and resulted in pre-tax losses over the period.

It was established that both scenarios would result in the coverage of the capital requirement reducing, with the second scenario seeing the greatest falls although not to the extent that the regulatory capital requirement or the internal risk appetite are breached.

C.3 Credit risk

C.3.1 Credit risk exposure

The Company is exposed to premium debtor default risk through the insurance business underwritten and cash at bank default risk, but these are not considered material.

The company has reinsured 100% all ongoing business since 1998 and therefore retains no net insurance risk on business incepted after this date. However, this gives rise to a reliance on a single reinsurance counterparty. The Board considers that this is an acceptable risk due to the financial benefits provided by the reinsurance arrangements. There were no material changes over the reporting period.

C.3.2 Credit risk concentration

The key concentration exists due to the 100% reinsurance arrangement in place with the Administrator. There is also a further reinsurance arrangement in place with a single reinsurer that relates to the pre 1998 liabilities. There is also risk due to the potential for premium debtor default.

C.3.3 Credit risk mitigation

The key mitigant is the formal reinsurance arrangement in place with the Administrator. The Company is named on the reinsurance treaties that the Administrator has in place with its reinsurers. However, no formal strikethrough clause exists which means that if the Administrator entered administration the Company would still need to approach the Administrator to make recoveries under the 100% quota share arrangement. In this scenario funds could be limited such that the Company may receive less than 100% of the recoveries due on the claims paid. The Board is aware of this situation.

The Company's risk appetite includes guidance on the quality of the individual counterparties used for depositing cash. Exposures are monitored quarterly as part of the financial information and risk appetite review.

The Board also monitors the financial performance of the Administrator and the Group Chief Executive of the Administrator attends a Board meeting annually to update on the financial performance and strength. The General Manager of the Company is also employed by the Administrator and provides updates on key developments.

Regular reporting is provided to the ARC on the pre 1998 liabilities and the reinsurer's response to the claims notified.

C.3.4 Credit risk sensitivity

The Company considers the risks to the business and stress and scenario testing is carried out on the most material risks identified on a regular basis.

C.4 Liquidity risk

C.4.1 Liquidity risk exposure

Liquidity risk is the risk that the company will not have sufficient financial resources to meet any obligations as they fall due, or will only be able to access these resources at an excessive cost. This is

most likely to arise when there is a significant catastrophe event which results in significant claim payments at short notice.

The liquidity of the Company is assessed through analysis of the cash flows expected to be needed as a result of the forecast claims.

There have not been any material changes to this risk over the reporting period.

C.4.2 Liquidity risk concentration

There are not considered to be any material liquidity risk concentrations.

C.4.3 Liquidity risk mitigation

The cash flows are analysed by the Administrator on behalf of the Board to assess the bank balances required to be maintained to pay the claims arising. The Company maintains minimum cash balances which are considered to be adequate to pay claims under normal circumstances.

There is a facility in place to allow for cash calls to be made against the Company's reinsurer. These can be made in the event of large payments due on large individual claims or an accumulation of smaller claims, usually as a result of weather or other natural catastrophe event.

The ARC considers the analysis of the cash flows on a quarterly basis and is responsible for determining the minimum acceptable level for the company bank accounts.

The company's investments are all held in OEICs which are deemed to be readily realisable.

C.4.4 Liquidity risk sensitivity

The Company considers the risks to the business and stress and scenario testing carried out on the most material risks identified on a regular basis.

The Board has considered this risk and the existing controls as part of the ongoing risk management process. Although scenario testing has not been carried out on this element, this is regularly reviewed.

C.4.5 Expected profit in future premiums

Expected profits in future premium are calculated using the expected combined operating measure derived from realistic business plans and applied to the future bound premium, including current premium debtors. The result is apportioned to line of business using the profile of premium written.

The total amount of the expected profit included in future premiums is £36k.

C.5 Operational risk

C.5.1 Operational risk exposure

The key operational risk that the Company is exposed to is through the JAA with the Administrator. The Administrator carries out all operational and administrative elements of the business on the Company's behalf. The Company does not have its own staff or systems so is reliant on the Administrator for the services specified in the JAA.

The ARC receives a monthly Business Report and quarterly Operational Risk Dashboard from the Administrator which provide details of the key operational areas. In addition, ad hoc reports on specific items are provided to the ARC where appropriate to enable the Board to assess the level of acceptable risk.

There have not been any changes to the risk exposure over the reporting period.

C.5.2 Operational risk concentration

There is a reliance on the Administrator through the outsourcing agreement for all operational and administrative elements of the business resulting in a material risk concentration. The Company does not have its own staff or systems and so is completely reliant on the Administrator for the services specified in the JAA.

C.5.3 Operational risk mitigation

The Company has a Procurement, Purchasing and Outsourcing Policy as referred to under section B.7 which covers the material outsourcing arrangements.

The JAA is the legal outsourcing contract which details the exact services to be provided. The Board monitors the performance of the Administrator against the JAA on a regular basis.

C.5.4 Operational risk sensitivity

The Company considers the risks to the business and stress and scenario testing carried out on the most material risks identified on a regular basis.

The Board has considered this risk and the existing controls as part of the ongoing risk management process. Although scenario testing has not been carried out on this element, this is regularly reviewed.

C.6 Other material risks

C.6.1 Other material risk exposure

The Company regards reputational risk as a key risk type. This is the potential for events to occur which could result in negative impacts upon the Company. It can often result due to the operation of the other risk types, for example, a system failure could result in an inability to service policyholders and claimants and result in reputational damage in the eyes of these customers.

The Board is responsible for the management of this risk and considers the potential reputational impacts to the business as part of the ongoing strategic discussions. The assessment of a number of the other risk types considers reputational impacts as a key component in determining the materiality.

There have been no material changes to the risk over the reporting period.

C.6.2 Other material risk concentration

There are no other material risk concentrations to note.

C.6.3 Other material risk mitigation

Reputational risk is mitigated through the effective management of the other key risk types and also through the response to such events if negative reputational impacts occur. Capital is not held against reputational risk.

The Board monitors the ongoing effectiveness of the risk mitigation at their regular meetings and as part of the monitoring of the other risk types.

C.6.4 Other material risk sensitivity

The Company considers the risks to the business and stress and scenario testing carried out on the most material risks identified on a regular basis.

The Board has considered this risk and the existing controls as part of the ongoing risk management process. Although scenario testing has not been carried out on this element, this is regularly reviewed.

C.7 Any other information

The Board has assessed that there is no other material information to note.

D. Valuation for solvency purposes

All material asset and liability classes other than technical provisions have been valued in accordance with Article 75 of Directive 2009/138/EC ('the Directive') and Articles 7 to 16 of the Delegated Regulation (EU) 2015/35 ('the Delegated Act'), taking into account the European Insurance and Occupational Pensions Authority (EIOPA) publication 'EIOPA-BoS-15/113 – *Guidelines on recognition and valuation of assets and liabilities other than technical provisions*'.

Technical provisions have been valued in accordance with Articles 76 to 86 of the Directive.

As permitted by Article 9 of the Delegated Act, the valuation of assets and liabilities are based, where appropriate, on the valuation method used in the preparation of the annual financial statements. The financial statements have been prepared in accordance with international financial reporting standards (IFRS) and audited by external auditors.

Material assets and liabilities are defined as assets and liabilities that are valued in excess of £60k (Equivalent to 1% of IFRS net assets).

International Accounting Standard (IAS) 39, Financial Instruments: Measurement and Recognition, requires the classification of certain financial assets and liabilities into separate categories for which the accounting requirement is different.

The classification depends on the nature and purpose of the financial assets and liabilities, and is determined at the time of initial recognition. Financial instruments are initially measured at fair value. Their subsequent measurement depends on their classification.

Financial instruments designated as at fair value through profit or loss are subsequently carried at fair value. This category consists of financial investments.

All other financial assets and liabilities are held at amortised cost using the effective interest method, except for short-term receivables and payables where the recognition of interest would be immaterial.

The Directors consider that the carrying value of those financial assets and liabilities not carried at fair value approximates to their fair value.

D.1 Assets

D.1.1 Solvency II valuation of assets

A copy of the Quantitative Reporting Template (QRT) 'S.02.01.02 – Balance sheet' is included in Appendix 1, which is a list of assets and liabilities by type. The table below summarises the SII net valuation of assets and liabilities and the difference compared to the financial statements prepared in accordance with IFRS, with a breakdown of the valuation of assets:

Solvency II Valuation	2017 As reported IFRS Basis £'000	Reclassify to aid comparison	2017 Reclassified IFRS valuation £'000	Net valuation movement	2017 Solvency II Valuation £'000
Total Assets	13,478	(397)	13,081	(2,067)	11,014
Total liabilities	7,026	(397)	6,629	(2,410)	4,219
Net assets	6,452		6,452	343	6,795
Breakdown of asset valuation					
Technical provisions - Reinsurance recoverables	5,749	(100)	5,649	(2,065)	3,584
Investments	6,364	-	6,364	-	6,364
Cash and cash equivalents	1,064	-	1,064	-	1,064
Insurance & intermediaries receivables	231	(229)	2	-	2
Reinsurance receivables	68	(68)	-	-	-
Receivables (trade, not insurance)	2	-	2	(2)	-
Total assets	13,478	(397)	13,081	(2,067)	11,014

The table includes reclassification of certain IFRS assets and liabilities to aid comparability. This has been done as items such as reinsurance payables, which are included within other liabilities in the annual financial statements, are included within the valuation of reinsurance recoverables for SII provided they are not past their due date. Moving this balance from liabilities to assets removes the need to disclose the same difference in both assets and liabilities.

Technical provisions - Reinsurance Recoverables

The valuation of reinsurers' share of technical provisions and the differences in valuation methodology compared with the financial statements are covered in section D.2.

Investments - Participations

Included within investments are subsidiary undertakings that are dormant, having not traded since incorporation and have been valued at cost. The Directors consider that cost approximates to their fair value.

Investments other than participations

The fair value measurement basis used to value financial assets or liabilities held at fair value, which includes investments, is categorised into a fair value hierarchy as follows:

Level 1: fair values measured using quoted prices (unadjusted) in active markets for identical assets or liabilities. This category includes listed equities in active markets, listed debt securities in active markets and exchange traded derivatives.

Level 2: fair values measured using inputs other than quoted prices included within level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices). This category includes listed debt or equity securities in a market that is not active and derivatives that are not exchange traded.

Level 3: fair values measured using inputs for the asset or liability that are not based on observable market data (unobservable inputs). This category includes unlisted equities, including investments in venture capital, and suspended securities.

All financial instruments recognised by the company and designated at fair value are classified as level 1.

Cash and cash equivalents

This comprises on demand deposits with banks. Cash balances are not subject to a significant risk of change in value and are considered to be held at fair value.

Insurance & intermediaries receivables and reinsurance receivables

Due to the short term nature of the outstanding balances, their amortised cost is assumed to approximate to their fair value. For SII, this only comprises debtor balances past due. Debtor balances that are not past due are future cash flows that form part of technical provisions as covered in sections D.2 below. As no balances are past due, this balance is nil for SII.

Receivables (Trade, not insurance)

The valuation of non-insurance receivables is nil as SII excludes £2k of prepayments which have no economic value.

D.2 Technical provisions

D.2.1 Solvency II valuation of technical provisions and assumptions used

Under SII the technical provisions are made up of:

- Discounted best estimate claims provisions;
- Discounted best estimate premium provisions; and
- Risk margin.

The non-life technical provisions (TPs) are calculated as a sum of best estimate and risk margin using a three-stage process of grouping data for homogeneous risks, selecting methodologies and setting assumptions which take into account the economic, underwriting and reserving cycles.

The reserving process captures material factors via engagement and interaction across relevant business areas, particularly the claims and underwriting functions. These factors may not be inherent in the historical data, for example a change introduced to the claims management philosophy may impact the incurred development pattern going forward.

The level of governance applied in setting the TPs is varied depending on the reporting date. The full governance framework is applied as an on-going cycle of activity, particularly driven by external financial reporting dates. Multiple review steps are in place, plus an external audit. This framework is used to sign-off the key reserving assumptions for both the IFRS statutory accounts, and the SII TPs.

The reserving framework is structured such that sufficient oversight exists within the reserve setting process through reviews by key stakeholders within management, by the Actuarial Function Director, and ultimately by the Board via Committee. This ensures there is an independent challenge to the process

and results, and that future developments within the business are incorporated into the projections where appropriate.

Modelling methodologies and assumptions

The nature of input assumptions for the reserving models used in projecting ultimate claims costs varies based on the class of business modelled, the levels of historical data available and the nature and complexity of the underlying risk. The final choice of model and assumptions involves professional actuarial judgement and a technical review within the reserving Governance Framework.

The following methods are used accordingly:

- Incurred Development Factor Method (DFM) used either in isolation for 'fire and other property damage' classes or in combination with other methods for liability and latent classes;
- Bornhuetter-Ferguson Method (BF) used primarily for more recent development years for the liability classes;
- · Frequency-Severity Approach for liability classes; and
- Simplified methods likes scaling based on exposure measures and Events Not In Data (ENID).

Once the best estimates are calculated, all future years' cash flows are discounted to present value using the prescribed EIOPA risk-free discount curve for the relevant currency interest rate-term structure. No transitional arrangements or adjustments are applied for the non-life TPs relating to matching or volatility adjustment.

Valuation

Claims provisions, premium provisions and risk margin by class are reported on 'QRT S.17.01.02 – Non-life technical provisions' which is included in Appendix 5. The two major contributors to the TPs are the 'general liability' and 'fire and other property damage' classes of business.

Risk margin

The SCR used for calculating the risk margin is a subset of the full standard formula calculated on a 1-year view of risk, reflecting only those risks on already obligated future business as at the balance sheet date.

D.2.2 Level of uncertainty

The estimation of the ultimate liability arising from claims made under non-life insurance contracts is subject to uncertainty as to the total number of claims made on each class of business, the amounts that such claims will be settled for and the timings of any payments. Examples of uncertainty include:

- whether a claims event has occurred or not and how much it will ultimately settle for;
- variability in the speed with which claims are notified and in the time taken to settle them, especially complex cases resolved through the courts;
- changes in the business portfolio affecting factors such as the number of claims and their typical settlement costs, which may differ significantly from past patterns;
- new types of claim, including latent claims, which arise from time to time;
- changes in legislation and court attitudes to compensation, which may apply retrospectively;
- the potential for periodic payment awards, and uncertainty over the discount rate to be applied when assessing lump sum awards;

- the way in which certain reinsurance contracts (principally liability) will be interpreted in relation to unusual/latent claims where aggregation of claimants and exposure over time are issues; and
- whether all such reinsurances will remain in force over the long term.

While the best estimate TPs calculation targets reserving for the average or expected future cost within a range of possible outcomes, due to the uncertainties it is likely that the actual costs will differ from the reserved amount.

Sensitivity analysis

In order to better understand the underlying uncertainty, a range of possible outcomes are tested and analysed. Sensitivity Analysis is a technique used to understand the variability of possible outcomes. This is done by analysing the change in TPs as a result of adjusting a single input parameter.

The table below shows the results of several sensitivity tests, which have been selected to provide coverage of a broad range of risks, which it is foreseeable could materialise within the next 12 months. This is for illustrative purposes and does not represent an exhaustive list of possible events:

Risk	Sensitivity applied	£'000
Claims inflation	+ 1.0% each year applied cumulatively	14
Discount rate shift	+ 0.5% to spot rate at all durations	(13)
Reinsurance default	All reinsurer ratings downgraded to B	41

The largest sensitivity considered is the reinsurance default shock due to the critical part that reinsurance strategy plays in the business model of the Company. Counterparty default risk remains an important component of the Company SCR.

The choice of yield curve shock is based on the assumption that if there are upward or downward rate cycles, the Bank of England will change the interest rates by 25 basis points (bps) at a time, with an assumption of two base rate changes per year translating to an equivalent up or down shift at all durations.

The inflation and discount rate sensitivities are individually broadly symmetric in that an equivalent decrease in the respective inputs will decrease or increase the TPs by a similar order as the above.

Reinsurance default also represents a significant shock due to the critical part that reinsurance strategy plays in the business model of the Company. Counterparty default risk is an important component of the SCR therefore the risk margin is also sensitive to this item.

D.2.3 Comparison of solvency II technical provisions with valuation in annual financial statements

The building blocks making up the TPs can be split between those for which the valuation methodology is compatible between SII and current IFRS, and those which by requirements of the SII technical specifications will necessarily be different.

The claims provision calculation (liability on earned business) may follow similar bases, methods and assumptions as IFRS, with the exception that the accounts are currently undiscounted whereas a SII discount rate is prescribed by EIOPA and applied to the total reserves.

Other adjustments relate to different definition of contract boundaries, the allowance for future earned profits and the consideration of future premium cash inflows in the premium provision for SII;

Net technical provisions	2017 £'000
IFRS Technical Provisions net of debtors and creditors	519
Adjustment for risk margin	(362)
Adjustment for discounting	(34)
Other adjustments	(10)
SII Net technical provisions	113

D.2.4 Use of the matching adjustment, the volatility adjustment, the transitional risk-free interest rate-term structure and Use of the Article 308[d] transitional deduction

The matching adjustment, volatility adjustment, use of the transitional risk-free interest rate-term structure and use of the transitional deduction is not applied to the non-life insurance TPs.

D.2.5 Recoverables from reinsurance contracts and special purpose vehicles

The recoverables are calculated separately by class of business taking into account the arrangements that are in place for each year of loss. Other than for losses prior to 1998, the reinsurance arrangement is for 100% of the business. The operational management of the portfolio and any retrocession arrangement decisions affecting the profit share are delegated to the Administrator as part of this arrangement.

The relative size of reinsurance recoverables included in the TPs from period to period is closely linked to the relative size of reserves by class, subject to occurrence or otherwise of unusually large losses for the excess of loss accounts.

D.2.6 Material changes in the assumptions made in the calculation of technical provisions compared to the previous reporting period

There have been no significant changes to previously used assumptions for the premium provision, which remain aligned to business plans.

D.3 Other liabilities

D.3.1 Solvency II valuation of other liabilities

A copy of the Quantitative Reporting Template (QRT) 'S.02.01.02 – Balance sheet' is included in Appendix 1, which is a list of assets and liabilities by type. The table below summarises the SII net valuation of assets and liabilities and the difference compared with the financial statements prepared in accordance with IFRS, with a breakdown of the valuation of liabilities:

Solvency II Valuation	2017 As reported IFRS Basis	Reclassify to aid comparison	2017 Reclassified IFRS valuation	Net valuation movement	2017 Solvency II Valuation
T	£'000	£'000	£'000	£'000	£'000
Total Assets	13,478	(397)	13,081	(2,067)	11,014
Total liabilities	7,026	(397)	6,629	(2,410)	4,219
Net assets	6,452		6,452	343	6,795
Breakdown of liability valuation					
Technical provisions - non-life	6,400	(229)	6,171	(2,474)	3,697
Payables (trade, not insurance)	309	-	309	(6)	303
Deferred tax liabilities	-	-	-	70	70
Other liabilities	2	-	2	-	2
Reinsurance payables	167	(168)	(1)	-	(1)
Subordinated liabilities	148	-	148	-	148
Total liabilities	7,026	(397)	6,629	(2,410)	4,219

The table includes reclassification of certain IFRS assets and liabilities to aid comparability, as explained in section D.1.

Technical provisions - non-life

The valuation of technical provisions and the differences in valuation methodology compared with the financial statements is covered in section D.2.

Payables (trade, not insurance)

Trade payables consists of tax payable, amounts due to suppliers and accrued costs. The balances are all due within one year and are valued at their carrying value of amortised cost.

Included within 'Payables (trade, not insurance)' are unpresented cheques and unclaimed capital and dividends which are removed in the SII valuation as they have no economic value.

Deferred tax liabilities

The calculation of deferred tax for use in the financial statements is based on temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for tax purposes.

Deferred tax is measured using tax rates expected to apply when the related deferred tax asset is realised or the deferred tax liability is settled based on tax rates and laws which have been enacted or substantively enacted at the year-end date. For the current reporting period the value of deferred tax liability was nil.

A deferred tax asset in respect of accrued charitable grant payments had not been recognised in the financial statements as the volatility of the insurance business and investment markets may lead to insufficient profits arising next year to recover it. The relief for gift aid cannot be carried forward to recover

in future years, and therefore has not been recognised to offset any deferred tax liability that arises under SII.

For SII the deferred tax liability has been calculated to take into account the valuation differences between the financial statements and the SII valuation of assets and liabilities. As this timing difference is not expected to reverse in the foreseeable future, the tax rate used is 17%, being the rate of corporation tax that becomes effective from April 2020.

Any other Liabilities

Intercompany balances with the Company's dormant subsidiaries are shown as any other liabilities. In light of their immateriality, their amortised cost is assumed to approximate to their fair value.

Reinsurance payables

Only amounts past their due date are included in reinsurance payables under SII as amounts not past their due date form part of TPs which is covered in Section D.2.

Subordinated Liabilities

This comprises share capital issued by the Company. The Company's 'preference' and 'ordinary' preference shares are entitled to annual dividends of 4% and 5% respectively on the amount paid up. The Company has an obligation at the year-end date in relation to the dividends payable on the shares and, because of this, the Company is required to account for the whole of its called up share capital as 'permanent interest-bearing capital' in the statement of financial position under IAS 32, Financial Instruments: Presentation. Both classes of issued shares are fully paid up.

Under SII the called up value of these shares are valued as part of liabilities, but can be recognised as capital in the Company's Own Funds, which is covered in section E.2.

D.4 Alternative methods for valuation

No alternative valuation methods have been used in the valuation of SII assets or liabilities.

D.5 Any other information

There is no other information that requires disclosure regarding the valuation of assets and liabilities.

E. Capital Management

E.1 Own funds

Under SII capital that the Company can use to meet its regulatory SCR and MCR is called Own Funds. Off balance sheet items that can be called upon to absorb losses are called Ancillary Own Funds. The Company does not hold any such items.

The excess of assets (section D.1.1) over liabilities (section D.3.1) plus qualifying subordinated debt less any foreseeable distributions constitutes basic own funds:

Basic Own Funds	2017 £'000	2016 £'000
SII Valuation of assets	11,014	10,193
SII Valuation of liabilities	(4,219)	(3,983)
Excess of assets over liabilities	6,795	6,210
Qualifying subordinated debt	148	148
Foreseeable distributions	-	-
Basic own funds	6,943	6,358

Basic own funds are classified into tiers. Restrictions on how much of each tier can be used to cover the SCR and MCR are covered in sections E.1.3 and E.1.4 respectively.

The Company's 'preference' and 'ordinary' preference shares are classified as qualifying subordinated debt as both classes of preference capital are subordinate to all other debts and are irredeemable.

E.1.1 Own funds - objectives, policies and processes

The Company is committed to delivering the highest standards of financial and investment management, and all aspects of solvency.

The capital management policy covers all aspects of capital management, the definition and monitoring of capital available establishing the core principles around the distribution and capital raising, along with the associated allocation and use.

This Policy forms part of The Company's policy framework, which is a mechanism for statements of intent adopted by the Board, subject to local market, business practices and regulatory conditions.

The overall responsibility for reviewing and approving the capital management policy lies with The Board. The responsibility for the policy implementation resides with The Board through the ARC who are involved in managing capital and solvency.

The Board, supported through the JAA on a day to day operational level will ensure that:

Regulatory and Legislative

 Current and future rules are monitored and understood, particularly regarding the definition of capital and various capital requirements.

Definition and monitoring of Capital Available

- Capital is maintained at a sufficient quality in order to meet current and future projected
 requirements over the business plan period, ensure the Company has a defined risk appetite
 regarding the quality and tiering of capital required to meet its own internal appetite for solvency.
- Sufficient capital is held in order to satisfy capital requirements, regulatory or otherwise.
- The level of capital available in the Company is monitored on a regular basis in accordance with an agreed process.
- There is regular monitoring and review of the quality and tiering of capital, in order to assess whether the targets are met (on an ongoing basis).

Definition and monitoring of our Capital Requirements (Solvency)

- All current and future capital requirements (regulatory or otherwise) are understood at all times.
 Ensure the Company has an agreed definition of an 'Economic Capital Requirement', reflecting its own view of risk.
- The Company has an agreed risk appetite to ensure a satisfactory level of capital coverage on all relevant bases including a statement of coverage for its economic and regulatory capital.
- The Company has at least enough capital to meet its regulatory requirements at all times.
- All capital requirements covered by the risk appetite are calculated and the relevant solvency position reviewed on a regular basis – in accordance with an agreed process.
- Relevant stakeholders (i.e. regulators) are informed of any adverse changes to solvency positions in excess of agreed reporting levels.
- Future capital requirements and projected solvency positions throughout the period of the business plan are assessed as part of the ORSA process.

Principles around the Distribution and Raising of Capital

- There is a clearly defined process for assessing level of dividends and grants prior to any payment being made.
- There is a clearly defined process for monitoring market conditions and future capital needs in order to assess the requirement and benefit of capital raising or redemptions.
- Appropriateness for raising or redeeming capital is assessed against all other principles outlined in this policy (e.g. solvency coverage, capital quality).

Principles around the Allocation and Use of Capital

- There is an agreed approach to setting and monitoring the return on capital.
- There is a clear process for determining when a strategic decision should take into account a
 capital perspective; this must cover all decisions that materially change the use of capital or
 solvency position.
- Each such decision-making considers the impact on solvency, capital allocation, return on capital and any other principles included in this policy.

The Board will continue to monitor and maintain the integrity of the Capital Management Policy, standards and guidance to ensure they reflect the culture of the business and the regulatory environment in which it operates.

Reports detailing performance against this policy or any business critical changes will be reviewed periodically, but at least annually, by the ARC. Any breaches to this Policy or any incidents must be escalated immediately to the Chairman and Chairman of the ARC.

This Policy is reviewed every three years taking into account any changes to legislation, or more frequently should a significant change in the business, market or regulatory environment occur.

Business planning is conducted annually over a three year horizon.

E.1.2 Movement in own funds compared to prior period

A copy of the QRT 'S.23.01.01 – Own Funds' is included in appendix 6. The table below is a summary of own funds, by tier, with comparison to the prior year:

Analysis of Own Funds	Total	Tier	r 1	Tier 2	Tier 3
		Unrestricted	Restricted		
2017	£'000	£'000	£'000	£'000	£'000
Preference share capital	148	-	-	148	-
Reconciliation reserve	6,795	6,795	-	-	-
	6,943	6,795		148	
2016					
Preference share capital	148	-	-	148	-
Reconciliation reserve	6,210	6,210	-	-	-
	6,358	6,210		148	
Movement in own funds					
Preference share capital	-	-	-	-	-
Reconciliation reserve	585	585	-	-	-
	585	585			

The £148k of preference share capital is recognised as a liability in the Company's IFRS financial statements. Under SII the preference share capital has been classified as tier 2 capital as it meets the relevant requirements of Article 73 of the Delegated Act. No ancillary own funds have been recognised.

The reconciliation reserve is primarily retained earnings from the financial statements adjusted for differences in valuation between the financial statements and SII, as covered in section D. An analysis of the reconciliation reserve is included in Appendix 6.

The table below summarises the key movements in the reconciliation reserve between the current and prior year:

Movement in reconciliation reserve	£'000
Prior year balance	6,210
IFRS Retained earnings for year	398
Movement in SII revaluations:	
Net technical provisions	225
Movement in deferred tax due to revaluation	(38)
Total movement for year	585
Current year balance	6,795

Two key components of the IFRS retained earnings for the year are underwriting performance, covered in section A.2, and investment performance, covered in section A.3. Other items, such as tax and grant payments are covered in section A.4.

E.1.3 Eligible amount of own funds available to cover the Solvency Capital Requirement

The table below summarises the own funds eligible to cover the SCR:

Analysis of eligible own funds available to cover the SCR	2017 £'000	2016 £'000
Own funds eligible to cover SCR:		
Eligible tier 1 capital	6,795	6,210
Eligible tier 2 capital	148	148
Eligible tier 3 capital	-	-
Total eligible capital	6,943	6,358
Ineligible capital	-	-
Total own funds	6,943	6,358

Tier 2 own funds cannot amount to more than 50% of the SCR and Tier 3 own funds cannot amount to more than 15% of the SCR.

E.1.4 Eligible amount of own funds available to cover the Minimum Capital Requirement

The table below summarises the own funds eligible to cover the MCR:

Analysis of eligible own funds available to cover the MCR	2017 £'000	2016 £'000
Own funds eligible to cover MCR:		
Eligible tier 1 capital	6,795	6,210
Eligible tier 2 capital	148	148
Total eligible capital	6,943	6,358
Ineligible capital	-	-
Total own funds	6,943	6,358

Tier 2 capital cannot amount to more than 20% of the MCR and Tier 3 capital cannot be used to cover the MCR.

E.1.5 Comparison between solvency II own funds and equity reported in the financial statements

Reconciliation from IFRS net assets to Solvency II o	wn funds	2017 £'000	2016 £'000
Equity as reported in IFRS Financial Statements		6,452	6,054
Recognise subordinated debt (preference share capital) a	is equity	148	148
Revalue technical provisions: Gross technical provision	าร	(2,065)	(2,060)
Reinsurers' share		2,474	2,244
Adjust for assets and liabilities with no SII fair value		4	4
Impact of revaluation on deferred tax		(70)	(32)
Solvency II Valuation of own funds		6,943	6,358

Both classes of preference capital of the Company, which are included within liabilities in the IFRS financial statements, can be recognised as tier 2 capital for solvency purposes.

Technical provisions are revalued on a SII basis as described in section D.2.

Some assets and liabilities such as prepayments are removed from the SII valuation as they are inadmissible or deemed to have no measurable fair value.

The difference between the Solvency II value of net assets and the value used for the calculation of tax gives rise to an adjustment to the deferred tax provision, as covered in section D.3.

E.1.6 Transitional arrangements

There are no own fund items that are subject to transitional arrangements.

E.1.7 Ancillary own funds

Approval has not been sought for any form of ancillary own funds.

There is no unpaid share capital in issue and no material letters of credit, guarantees or any other legally binding commitments have been identified or recognised.

E.1.8 Items deducted from own funds and restrictions affecting the availability and transferability of own funds

No items have been deducted from basic own funds, and there is no significant restriction affecting the availability and transferability of own funds.

E.2 Solvency Capital Requirement [SCR] & Minimum Capital Requirement [MCR]

E.2.1 SCR and MCR

The SCR is the amount of capital that the Company is required to hold as required by the SII Directive. The Company uses the Standard Formula SCR calculation which is defined in the SII Delegated Act. This is formula based and consists of modules for each risk type, and adjustments for diversification and the loss absorbing capacity of deferred tax. A breakdown of the SCR elements applicable to the Company is given in the following section.

The MCR is the higher of the absolute floor (£3.25m) and the combined MCR.

The combined MCR is based on the linear MCR, subject to a cap (45% of the SCR) and floor (25% of the SCR). The Linear MCR is a simplistic calculation based on factors applied to net written premiums and net best estimate of TPs, analysed by class of business.

A copy of the QRTs 'S.25.01 – Solvency Capital Requirement' and 'S.28.01 – Minimum Capital Requirement' are reproduced in appendices 7 and 8 respectively.

As at 31 December 2017 the SCR for the Company was £1,760k, and the MCR was £3,251k. Both amounts are still subject to supervisory assessment.

E.2.2 SCR by risk module

The following table gives a breakdown of the standard formula SCR of the Company and summarises the movement in the SCR and MCR between the current and prior year:

Capital Requirements	2017	2016	Change
	£'000	£'000	£'000
Market risk	1,582	1,030	552
Counterparty default risk	493	486	7
Non-life underwriting risk	89	90	(1)
Diversification	(359)	(323)	(36)
Basic SCR	1,805	1,283	522
Operational risk	107	106	1
Loss absorbing capacity of deferred tax	(152)	(110)	(42)
SCR	1,760	1,279	481
MCR	3,251	3,332	(81)

E.2.3 Changes to the SCR and MCR compared to the prior period

The Company has utilised the transitional calculation for equity risk in the calculation of the SCR. This transitional option tapers the capital charge that is applied to equities over seven years when using the standard formula, but only for assets held prior to January 2016. The growth in market risk is driven by equity holdings purchased within the year which are not eligible for transitional relief. Diversification has increased as a consequence of the increase in market risk.

The loss absorbing capacity of deferred tax has increased following a corresponding increase in the Solvency II balance sheet deferred tax liability.

The MCR is equivalent to the absolute floor for both the current and prior year. As the absolute floor is quoted in Euros and not the reporting currency of sterling, changes in exchange rate, and not movement in the absolute floor, is the driver of the change compared to the prior year.

E.2.4 Use of simplified calculations and undertaking specific parameters and use of the option provided for in the third subparagraph of Article 51(2) of Directive 2009/138/EC

No simplifications or undertaking specific parameters have been used in calculating the standard formula SCR. As no capital add-on has been applied, and no undertaking specific parameters have been utilised, no illustration of their impact is necessary and use of the option provided for in the third subparagraph of Article 51(2) of the Directive has not been made.

E.2.5 Inputs used in the calculation of the MCR

A copy of the QRT 'S.28.01.01 - Minimum Capital Requirement' showing the inputs used for the calculation of the MCR is included in Appendix 8.

E.3 Use of the duration-based equity risk sub-module in the calculation of the SCR

The duration-based equity risk sub-module has not been used.

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

An internal model has not been used in calculating the Company's SCR.

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

E.5.1 MCR non-compliance

There has been no breach of the MCR during the reporting period.

E.5.2 SCR non-compliance

There has been no breach of the SCR during the reporting period.

E.6 Any other information

No further information regarding the capital management of the company is required.

Appendix 1 – QRT S.02.01.02 Balance Sheet

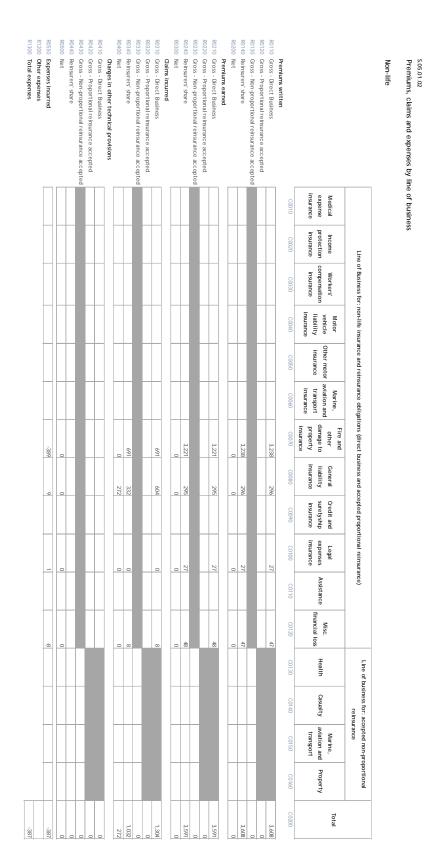
S.02.01.02

Balance sheet

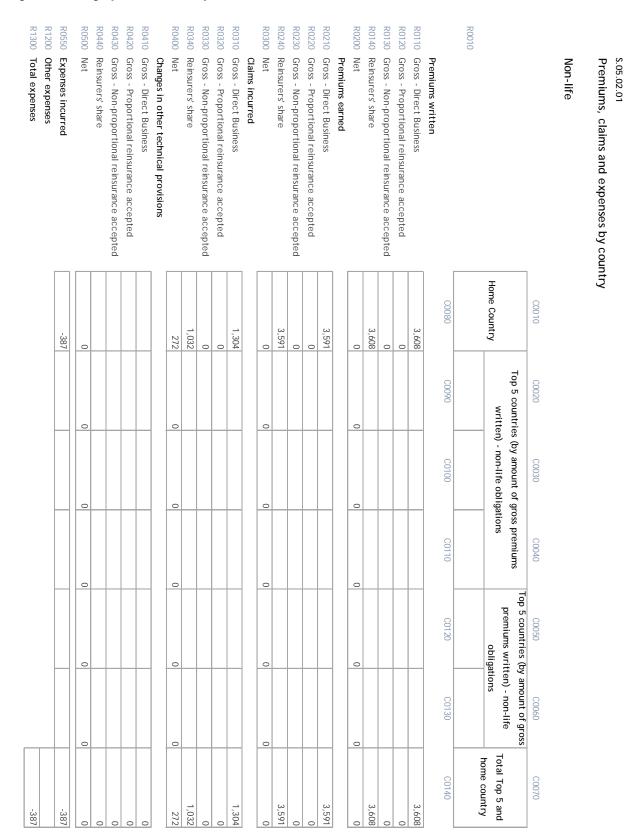
	balance sneet	Solvency II
		value
	Assets	C0010
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	6,364
R0080	Property (other than for own use)	0
R0090	Holdings in related undertakings, including participations	2
R0100	Equities	0
R0110	Equities - listed	
R0120	Equities - unlisted	
R0130	Bonds	0
R0140	Government Bonds	0
R0150	Corporate Bonds	0
R0160	Structured notes	0
R0170	Collateralised securities	0
R0180	Collective Investments Undertakings	6,362
R0190	Derivatives	
R0200	Deposits other than cash equivalents	0
R0210	Other investments	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	0
R0240	Loans on policies	0
R0250	Loans and mortgages to individuals	
R0260	Other loans and mortgages	
R0270	Reinsurance recoverables from:	3,584
R0280	Non-life and health similar to non-life	3,584
R0290	Non-life excluding health	3,584
R0300	Health similar to non-life	0
R0310	Life and health similar to life, excluding index-linked and unit-linked	0
R0320	Health similar to life	
R0330	Life excluding health and index-linked and unit-linked	
R0340	Life index-linked and unit-linked	
R0350 I	Deposits to cedants	0
R0360 I	Insurance and intermediaries receivables	2
R0370	Reinsurance receivables	
R0380	Receivables (trade, not insurance)	
R0390	Own shares (held directly)	0
D0400	Amounts due in respect of own fund items or initial fund called up but not yet	
R0400	paid in	0
R0410	Cash and cash equivalents	1,064
R0420	Any other assets, not elsewhere shown	
R0500	Total assets	11,015

		Solvency II
		value
	Liabilities	C0010
R0510	Technical provisions - non-life	3,697
R0520	Technical provisions - non-life (excluding health)	3,697
R0530	TP calculated as a whole	0
R0540	Best Estimate	3,561
R0550	Risk margin	136
R0560	Technical provisions - health (similar to non-life)	0
R0570	TP calculated as a whole	0
R0580	Best Estimate	0
R0590	Risk margin	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	Technical provisions - health (similar to life)	0
R0620	TP calculated as a whole	
R0630	Best Estimate	
R0640	Risk margin	
R0650	Technical provisions - life (excluding health and index-linked and unit-linked)	0
R0660	TP calculated as a whole	
R0670	Best Estimate	
R0680	Risk margin	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	TP calculated as a whole	
R0710	Best Estimate	
R0720	Risk margin	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	70
R0790	Derivatives	
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	
R0830	Reinsurance payables	
R0840	Payables (trade, not insurance)	302
R0850	Subordinated liabilities	148
R0860	Subordinated liabilities not in BOF	
R0870	Subordinated liabilities in BOF	148
R0880	Any other liabilities, not elsewhere shown	2
R0900	Total liabilities	4,220
	'	
R1000	Excess of assets over liabilities	6,795

Appendix 2 – QRT S.05.01.02 Non-life premiums, claims and expenses by line of business *(unaudited)*



Appendix 3 – QRT S.05.02.01 Non-life premiums, claims and expenses by country *(unaudited)*



Appendix 4 – QRT S.17.01.02 Non-life technical provisions

MAITLIG TOUTHINGT FLOVISIONS																	
					Direct busin	ness and accept	Direct business and accepted proportional reinsurance	reinsurance					Acc	pted non-propo	Accepted non-proportional reinsurance	nce	
	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 Hability Insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Non- Miscellaneous proportional financial loss health reinsurance	Non- proportional health reinsurance	Non- proportional casualty reinsurance	Non- proportional marine, aviation and transport	Non- proportional property reinsurance	Total Non-Life obligation
	C0020	C0030	C0040	C0050	00060	C0070	C0080	00090	C0100	C0110	00120	00130	00140	C0150	00160	C0170	C0180
R0010 Technical provisions calculated as a whole rotal recoverables from reinsurance/s/rv and r-inite re							0	0		0		0					
after the adjustment for expected losses due to counterparty default associated to TP calculated as a																	
whole Technical provisions calculated as a sum of BE and RM																	
Best estimate Premium provisions																	
R0060 Gross							641	78		-5		_					715
R0140 Re after the adjustment for expected losses due							931	83		-4		ω					1,012
R0150 Net Best Estimate of Premium Provisions							-289	-5		-1		-2					-297
Claims provisions																	
R0160 Gross							354	2,480		0		12					2,846
R0240 Re after the adjustment for expected losses due							348	2,212		0		12					2,572
R0250 Net Best Estimate of Claims Provisions							6	268		0		0					274
R0260 Total best estimate - gross							996	2,558		÷		13					3,561
R0270 Total best estimate - net							-283	263		-1		-2					-23
R0280 Risk margin							49	87		0		1					
Amount of the transitional on Technical Provisions R0290 Technical Provisions calculated as a whole																	
R0300 Best estimate																	
R0310 Risk margin																	
R0320 Technical provisions - total							1,044	2,644		-5		13					3,697
R0330 Finite Re after the adjustment for expected losses due to counterparty default - total							1,279	2,295		4		15					3,584
Technical provisions minus recoverables from R0340 reinsurance/SPV and Finite Re - total							-234	350									

S.19.01.21 Non-Life insurance claims

Total Non-life business

Appendix 5 – QRT S.19.01.21 Non-life insurance claims (unaudited)

1										
								879	2017	R0250
							210	514	2016	R0240
						46	270	0	2015	R0230
					45	365	0	0	2014	R0220
				39	61	0	0	0	2013	R0210
			50	54	0	0	0	0	2012	R0200
		61	67		0	0	0	0	2011	R0190
	47	94	0		0	0	0	0	2010	R0180
50	48	0	0	0	0	0	0	0	2009	R0170
41 44	0	0	0		0	0	0	0	2008	R0160
1,662									Prior	R0100
9 10 & +	7 8	6	57	4	ω	2	_	0		
			ent year	Development year					Year	
80 C0290 C0300	C0270 C0280	C0260	C0250	C0240	C0230	C0220	C0210	C0200		
								mount)	(absolute amount)	
					ons	aims Provisi	Estimate Cl.	Gross Undiscounted Best Estimate Claims Provisions	Gross Undis	
										000
To+21										D0260
								461	2017	R0250
							256	465	2016	R0240
						124	479	291	2015	R0230
					6	47	359	847	2014	R0220
				0	υī	65	318	416	2013	R0210
			0	18	10	37	274	474	2012	R0200
		0	74		<u>.</u>	41	351	467	2011	R0190
	55	112	6	13	31	88	1,201	575	2010	R0180
2	90	246	70	668	718	479	246	463	2009	R0170
0 0	0	2	0	-421	92	113	1,568	623	2008	R0160
<u>-</u>									Prior	R0100
9 10 & +	7 8	6	σ	4	ω	2	_	0		
			ent year	Development year					Year	
90 C0100 C0110	C0080 C0090	C0070	C0060	C0050	C0040	C0030	C0020	C0010		
								nount)	(absolute amount)	
							umulative)	Gross Claims Paid (non-cumulative)	Gross Claim	

Page 58 of 62

S.23.01.01 Own Funds

Appendix 6 – QRT S.23.01.01 Own Funds

R0230 Deductions for participations in financial and credit institutions 80200 Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds Expected profits included in future premiums (EPIFP) - Non- life business SCR Total eligible own funds to meet the SCR Total basic own funds after deductions Other own fund items approved by the supervisory authority as basic own funds not specified above Total Expected profits included in future premiums (EPIFP) Expected profits included in future premiums (EPIFP) - Life business Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds Other basic own fund items Foreseeable dividends, distributions and charges Own shares (held directly and indirectly) Excess of assets over liabilities Ratio of Eligible own funds to MCR Ratio of Eligible own funds to SCR Total eligible own funds to meet the MCR Total available own funds to meet the MCF Total available own funds to meet the SCR Available and eligible own funds Total ancillary own funds Other ancillary own funds Supplementary members calls - other than under Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC A legally binding commitment to subscribe and pay for subordinated liabilities on demand Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand Unpaid and uncalled ordinary share capital callable on demand Ancillary own funds An amount equal to the value of net deferred tax assets Subordinated liabilities Share premium account related to preference shares Subordinated mutual member accounts Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings Share premium account related to ordinary share capital Ordinary share capital (gross of own shares) Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35 first subparagraph of Article 96(3) of the Directive 2009/138/EC C0060 Total 213.59% 394.39% 3,251 6,943 6,943 6,94 unrestricted Tier 1 6,795 6,795 6,795 6,795 6,795 restricted Tier 1 Tier 2 148 Tier 3

Appendix 7 – QRT S.25.01.21 Solvency Capital Requirement

s.25.01.21 Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency		<u>.</u>
		capital requirement	USF	Simplifications
		C0110	C0090	C0120
R0010	Marketrisk	1,582		
R0020	Counterparty default risk	493		
R0030	Life underwriting risk	0		
R0040	Health underwriting risk	0		
R0050	Non-life underwriting risk	89		
R0060	Diversification	-359		
	The state of the s			
R0100	Basic Solvency Capital Requirement	1,805		
	Calculation of Solvency Capital Requirement	C0100		
R0130	Operational risk	108		
R0140	Loss-absorbing capacity of technical provisions	0		
R0150	Loss-absorbing capacity of deferred taxes	-152		
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0		
R0200	Solvency Capital Requirement excluding capital add-on	1,760		
R0210	Capital add-ons already set	0		
R0220	Solvency capital requirement	1,760		
	Other information on SCR			
R0400	Capital requirement for duration-based equity risk sub-module	0		
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0		

Appendix 8 – QRT S.28.01.01 Minimum Capital Requirement

S.28.01.01

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

	Linear formula component for non-life insurance and reinsurance obligations	C0010		
R0010	MCR _{NL} Result	27		
			Net (of	
			reinsurance/SPV) best	Net (of reinsurance)
			estimate and TP	written premiums in
			calculated as a whole	the last 12 months
			C0020	C0030
R0020	Medical expense insurance and proportional reinsurance		0	0
R0030	Income protection insurance and proportional reinsurance		0	0
R0040	Workers' compensation insurance and proportional reinsurance		0	0
R0050	Motor vehicle liability insurance and proportional reinsurance		0	0
R0060	Other motor insurance and proportional reinsurance		0	0
R0070	Marine, aviation and transport insurance and proportional reinsurance		0	0
R0080	Fire and other damage to property insurance and proportional reinsurance		0	0
R0090	General liability insurance and proportional reinsurance		263	0
R0100	Credit and suretyship insurance and proportional reinsurance		0	0
R0110	Legal expenses insurance and proportional reinsurance		0	0
R0120			0	0
R0130	Miscellaneous financial loss insurance and proportional reinsurance		0	0
R0140	Non-proportional health reinsurance		0	0
R0150	Non-proportional casualty reinsurance		0	0
R0160	Non-proportional marine, aviation and transport reinsurance		0	0
R0170			0	0
110170				
	Linear formula component for life insurance and reinsurance obligations	C0040		
R0200	MCR _L Result	0		
			Net (of	Net (of
			reinsurance/SPV) best	reinsurance/SPV)
			estimate and TP	total capital at risk
			calculated as a whole	total suprital at 11sh
			C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits			
R0220	Obligations with profit participation - future discretionary benefits			
R0230	Index-linked and unit-linked insurance obligations			
R0240	Other life (re)insurance and health (re)insurance obligations			
R0250	Total capital at risk for all life (re)insurance obligations			
	Overall MCR calculation	C0070		
R0300	Linear MCR	27		
R0310	SCR	1,760		
R0320	MCR cap	792		
R0330	MCR floor	440		
R0340	Combined MCR	440		
R0350	Absolute floor of the MCR	3,251		
D0400	Minimum Capital Doguirament	2 251		
KU4UU	Minimum Capital Requirement	3,251		

Appendix 9 - Glossary of abbreviations

The Company The Baptist Insurance Company PLC

The Administrator The provider of outsourced management and administration services.

The Delegated Act Solvency II Delegated Regulation (EU) 2015/35

The Directive Solvency II Directive 2009/138/EC

AIA The Administrator's internal audit function ARC Audit, Risk and Compliance Committee

CFO Chief finance officer CRO Chief risk officer

EIOPA European Insurance and Occupational Pensions Authority

ENID Events Not in Data EU European Union

F&O Fire & Other Property Damage

GAC The Administrator's Group Audit Committee

GEP Gross Earned Premiums
GIC Gross Incurred Claims
GL General Liability
GWP Gross written premium

IAS International Accounting Standard

IBNR Incurred but not reported IC Investment Committee

IFRS International financial reporting standards

JAA Joint Administration Agreement

KFH Key Function Holder

MCR Minimum Capital Requirement

NED Non-executive Director

OCR Outstanding Case Reserves
OEIC Open Ended Investment Company
ORSA Own Risk and Solvency Assessment

PRA Prudential Regulation Authority
PSA Physical & sexual abuse

QRT Quantitative Reporting Template

SII Solvency II

SIP Statement of Investment Principles SCR Solvency Capital Requirement

SFCR Solvency and Financial Condition Report SIMR Senior Insurance Managers Regime

TPs Technical provisions

UPR Unearned Premium Reserve