DIRECT LINE INSURANCE GROUP PLC, U K INSURANCE LIMITED AND CHURCHILL INSURANCE COMPANY LIMITED

SINGLE SOLVENCY AND FINANCIAL CONDITION REPORT FOR THE YEAR ENDED 31 DECEMBER 2021

CONTENTS

INTRODUCTION

Direct Line Insurance Group plc (the "**Company**") together with its subsidiaries (the "**Group**") has prepared a Single Solvency and Financial Condition Report ("**SFCR**") as at 31 December 2021 in accordance with permission granted by the Prudential Regulation Authority ("**PRA**") in December 2015 to produce a Single SFCR. This permission allows the Group to produce one SFCR that covers both the Group and its individual regulated subsidiaries and is valid until 30 June 2025.

The Group's regulated entities are U K Insurance Limited ("**UKI**") and Churchill Insurance Company Limited ("**CIC**"). In meeting the requirements for a Single SFCR, information is reported for the Group, UKI and CIC separately except where that information is equivalent in both nature and scope at Group level to that at regulated subsidiary level. The Boards of Directors of the Company, UKI and CIC (the "**Boards**") have the same membership. Much of the information in the SFCR is equally relevant to the Group, UKI and CIC. Where this is not the case, this has been highlighted.

The requirement to produce an SFCR follows the introduction of Solvency II as the solvency framework which was implemented on 1 January 2016 as the capital adequacy regime for the European insurance industry. Solvency II has established a set of EU-wide capital requirements and risk management standards with the aim of increasing protection for policyholders. The UK continues to follow the solvency framework after the UK left the EU on 31 January 2020 and following the post-Brexit transition period which ended on 31 December 2020.

The SFCR presents information on the business and performance, system of governance, risk profile, valuation for solvency purposes and capital management of the Group, UKI and CIC. Relevant information about the business of the Group is also included in the Group's Annual Report & Accounts which is the primary vehicle for reporting performance, consolidated financial statements, corporate governance and risk management to the Group's investors. The Group's Annual Report & Accounts 2021 was published on its website in March 2022 and a copy can be found at: www.directlinegroup.co.uk/en/investors

Some elements of this report are subject to external audit as detailed in the Auditor's report, which can be found on page 65.

SECTION A – Business and performance summary

The Group

The Group's vision is to create a world where insurance is personal, inclusive and a force for good with a purpose to help people to carry on their lives, giving them peace of mind now and in the future.

The Group is Britain's leading private motor insurer represented through its well-known brands Direct Line, Churchill, Privilege and Darwin and through its partners.

The Group is one of Britain's leading personal home insurers. The Group reaches its customers by selling home insurance products through its brands Direct Line, Churchill and Privilege, and its partners including NatWest Group.

The Group is also one of the leading providers of rescue and pet insurance in the UK. The Group's rescue brand, Green Flag, is the third largest roadside recovery provider. The Group is also the fourth largest pet insurer. The Group protects commercial businesses through its brands, including NIG and Direct Line for Business.

In 2021, the Group continued transforming the business by using technology, data and digital tools to deliver more for its customers, backed by powerful brands, great service and market-leading claims capabilities. The Group is focused on building an insurance company of the future by putting sustainability at the heart of how it does business as it allows great people to thrive, creates a better corporate culture, drives competitiveness and provides a foundation for long-term rewards to its shareholders.

Solvency II lines of business

The policies underwritten by the Group are spread across the Solvency II lines of business including motor vehicle liability insurance, other motor insurance, fire and other damage to property insurance, general liability insurance, income protection insurance, legal expenses insurance, assistance and miscellaneous financial loss.

Business performance in 2021

On an International Financial Reporting Standards ("**IFRS**") basis in 2021 the Group delivered another year of strong profitability at the same time as growing its direct own brand policy count.

The Group has navigated the complexities and uncertainties of a challenging market, impacted by the pandemic. Commercial, Home own brands and Rescue have grown, benefiting from the investments made in recent years in technology and pricing, whilst in Motor the Group has prepared for future growth while steering a smart path through a period of falling premium and uncertain claims frequency as the market seeks to predict the shape of the pandemic and its effect on customer driving behaviour.

On strategic progress, after several years replacing the technology across the business, introducing agile ways of working and building data foundations, the Group has completed the main elements of its technology build. Through that transformation the Group has improved the profitability of the business written, with releases from older reserve years no longer such a significant part of annual profits. Performance has been delivered across the business, including the quality of claims management, pricing and improvements in cost efficiency.

Section A of the SFCR has more information on the Group's business and performance in 2021: see pages 6 to 17 of this report.

SECTION B – System of governance summary

The Board oversees the system of governance in operation throughout the Group. This includes a robust system of internal controls and a sound Risk Management Framework. The Board has established a risk management model that separates the Group's Risk Management responsibilities into three lines of defence. An explanation of these responsibilities can be found on page 89 of the Group's Annual Report & Accounts 2021 at www.directlinegroup.co.uk/en/investors

The Group's governance framework is detailed in the Group's High Level Control and System of Governance Framework document. This document also details how the Group meets Solvency II and the PRA requirements to identify key functions and to have and maintain a Responsibilities Map in respect of the PRA and Financial Conduct Authority's ("**FCA**") Senior Managers and Certification Regime requirements. The Board reviews this document annually.

The Structure of the Board, Board Committees and executive management together with the roles and responsibilities of the Board can be found on page 105 of the Group's Annual Report & Accounts 2021at www.directlinegroup.co.uk/en/investors

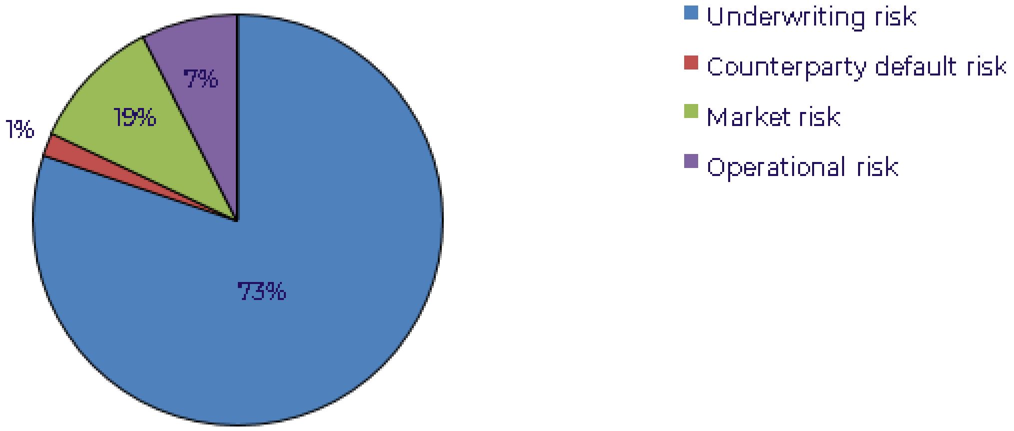
The terms of reference for each Committee can be found on the corporate website at: www.directlinegroup.co.uk/en/who-we-are/leadership/board-committees

Section B of the SFCR has more information on the Group's system of governance: see pages 18 to 30 of this report.

SECTION C – Risk profile summary

The Group's partial internal model and UKI's internal model are used to calculate the Group and UKI solvency capital requirements respectively.

The following chart shows the UKI solvency capital requirement ("**SCR**") of £1,304.7 million as at 31 December 2021, calculated using the approved internal model, by risk type. The SCR for the Group as at 31 December 2021 using its approved model was £1,354.2 million.



The risk profile of the Group and UKI has not changed materially over the reporting period.

Underwriting risk is the risk that future claims experience on business written is materially different from the results expected, resulting in current-year losses. Underwriting risk includes catastrophe risk and the risk of loss, or of adverse change in the value of the insurance liabilities resulting from significant uncertainty of pricing, underwriting and provisioning assumptions related to extreme or exceptional circumstances.

Market risk is the risk of loss resulting from fluctuations in the level and in the volatility of market prices of assets, liabilities and financial instruments.

Operational risk is the risk of loss due to inadequate or failed internal processes, human error, systems, or from external events.

Counterparty default risk is the risk of loss from unexpected default or deterioration in the credit standing of the counterparties and debtors of Group undertakings.

The Group continues to assess the risks relating to the impact of the FCA's Pricing Practices regulatory changes on customer behaviour, the legislative and regulatory environment and the likely time period of continued Covid-19 related effects including the impact on the underwriting cycle, motor claims frequency, travel and supply chain disruption and claims inflation.

Section C of the SFCR has more information on the Group's risk profile: see pages 31 to 39 of this report.

SECTION D – Valuation for solvency purposes summary

In accordance with the Solvency II requirements, the Group values all assets and liabilities on the balance sheets of the Group and its regulated entities at fair value, which represents an amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction. Goodwill and intangible assets are valued at zero.

An analysis of the Solvency II material classes of assets and liabilities is provided in sections D.1 and D.3 respectively. Section D details the recognition and valuations bases, the judgements and any assumptions made, including sources of estimation uncertainty applied for Solvency II, and compares these with judgements and assumptions made in the preparation of IFRS financial statements.

Section D.2 describes the bases, methods and assumptions for the valuation of Solvency II technical provisions, including the estimation uncertainty, and compares these with the bases, methods and assumptions used in the preparation of the IFRS financial statements.

A summary of the Solvency II balance sheets for the Group and its regulated subsidiaries is set out below:

31 December 2021	Group £m	UKI £m	CIC £m
Total investments	5,785.9	5,511.3	18.7
Property, plant and equipment held for own use	178.3	58.8	—
Reinsurance recoverables	1,170.3	1,144.9	27.3
Insurance and other receivables	183.3	129.2	—
Cash and cash equivalents	162.8	153.5	—
Deferred tax assets	179.4	29.3	—
Other assets	87.7	14.1	—
Total assets	**7,747.7**	**7,041.1**	**46.0**
Technical provisions	4,583.8	4,554.0	31.7
Provisions other than technical provisions	96.4	50.0	—
Derivatives	19.5	19.2	—
Debts owed to credit institutions	59.2	51.6	—
Financial liabilities other than debts owed to credit institutions	84.2	153.0	—
Insurance and other payables	151.8	32.0	0.2
Subordinated liabilities	509.4	251.8	—
Total liabilities	**5,504.3**	**5,111.6**	**31.9**
Excess of assets over liabilities	**2,243.4**	**1,929.5**	**14.1**

Section D of the SFCR has more information on the Group's valuation for solvency purposes: see pages 40 to 50 of this report.

SECTION E – Capital management summary

In June 2016, UKI, the Group's principal underwriter, received approval from the PRA to use its Internal Economic Capital Model which forms part of a Group-wide partial internal model which has been in use from the same date.

The Group aims to manage its capital efficiently and generate long-term sustainable value for shareholders, while balancing operational, regulatory, rating agency and policyholder requirements. The policies and processes that the Group adopts to manage its own funds to mitigate the risk of breaching regulatory and internal capital adequacy are described in the Group's Capital Management minimum standard.

The solvency capital ratio was as follows for the Group and regulated entities:

31 December 2021	Group £m	UKI £m	CIC £m
Solvency capital requirement	1,354.2	1,304.7	0.8
Capital surplus above solvency capital requirement	1,030.6	786.7	13.3
Solvency capital ratio (%)	176%	160%	1763%

Section E of the SFCR has more information on the Group's capital management: see pages 51 to 62 of this report.

Reconciliation of excess of assets over liabilities to own funds

31 December 2021	Group £m	UKI £m	CIC £m
Excess of assets over liabilities	**2,243.4**	**1,929.5**	**14.1**
Capital distributions	(299.4)	(90.0)	—
Own shares[1]	(37.5)	—	—
Less deferred tax assets	(179.4)	(29.3)	—
Less reclassified restricted Tier 1	(19.4)	—	—
Excess of assets over liabilities (Tier 1)	**1,707.7**	**1,810.2**	**14.1**
Reclassified restricted Tier 1 and subordinated liabilities (Tier 2)	528.7	251.8	—
Deferred tax assets (Tier 3)	179.4	29.3	—
Ineligible Tier 3 capital	(31.0)	—	—
Eligible own funds	**2,384.8**	**2,091.3**	**14.1**

Note:

1. Own shares (held directly) for employee share trusts form part of Tier 1 own funds and are included within assets on the Solvency II balance sheet.

Material changes

In July 2021, the Group announced a 10-year new partnership with Motability Operations to provide insurance to customers on the Motability Scheme demonstrating the Group's core strengths in delivering great customer service and efficient car repairs. The scheme serves over 640,000 people and is anticipated to increase Motor gross written premium by around £500 million each year from H2 2023.

On 4 March 2022, UKI entered into an agreement to extend its contract with NatWest Group until 2027 to continue to provide home insurance for its customers.

On 7 March 2022, the Board approved a share buyback programme of up to £100 million. The information in this SFCR, including the own funds and solvency capital ratios, has been presented to include the buyback as a foreseeable distribution.

As part of the Group's ongoing change of the core operational real estate portfolio, on 28 February 2022, the freehold interest in the Birmingham property with a carrying value of £24.4 million and impaired by £5.0 million to reflect the costs of remediation and estimated realisable value, was sold for £19.4 million.

The effective tax rate for 2021 was 22.9% (2020: 18.7%), higher than the standard UK corporation tax rate of 19.0% (2020: 19.0%) driven primarily by the non-deductible payment to terminate the lease on the Bromley property, and other disallowable expenses partly offset by tax relief for the Tier 1 coupon payments. The effective tax rate is higher than for 2020 due to the Bromley lease payment and is expected to return to a more normal level in future years, subject to any future one-off disallowable items.

SECTION A. BUSINESS AND PERFORMANCE (UNAUDITED)

In this section:

A. BUSINESS AND PERFORMANCE

A.1 Business

Name and legal form

Direct Line Insurance Group plc is a public limited company incorporated in England and Wales. It has a premium listing on the UK Listing Authority's Official List. The Company's Ordinary Shares (EPIC:DLG) are admitted to trading on the London Stock Exchange.

Supervision

The Company's supervisory authorities responsible for financial supervision are:

Prudential Regulation Authority ("**PRA**")
Bank of England
20 Moorgate
London
EC2R 6DA
Switchboard: +44 (0)20 3461 4444
Email: PRA.FirmEnquiries@bankofengland.co.uk

Financial Conduct Authority ("**FCA**")
12 Endeavour Square
London
E20 1JN
Phone: +44 (0)20 7066 1000
Email: firm.queries@fca.org.uk

Auditor

External Auditor:
Deloitte LLP
1 New Street Square
London
EC4A 3HQ
Phone: +44 (0)20 7936 3000

Holders of qualifying holdings

There were no holders of qualifying holdings in the Company as at 31 December 2021. A 'qualifying holding' is a direct or indirect holding in the Company which represents 10% or more of the capital or of the voting rights or which makes it possible to exercise a significant influence over the management of the Company.

Group ownership and structure

The Company is the ultimate holding company of the Group. The underwriting subsidiaries of the Company, both of which are 100% owned, are as follows:

- U K Insurance Limited – general insurance
- Churchill Insurance Company Limited – general insurance

The Group publishes a Single SFCR following PRA approval and a modification to the PRA Handbook. This is a single publication of a Group SFCR for Direct Line Insurance Group plc and its subsidiaries, and solo SFCR reports for both UKI and CIC. Information is separately identifiable by reference to the Group, UKI and CIC.

Basis of consolidation

The Solvency II Group balance sheet is a full consolidation in accordance with Article 335 and there are no differences in the scope of the Group used for the Group's consolidated financial statements in its Annual Report & Accounts 2021.

Subsidiaries

The subsidiary undertakings of the Company are set out below. Their capital consists of Ordinary Shares which are unlisted.

In all cases, the Company owns 100% of the Ordinary Shares, either directly or through its ownership of other subsidiaries, and exercises full control over their decision making.

Name of subsidiary	Company registration number	Place of incorporation and operation	Principal activity
Directly held by the Company:			
Direct Line Group Limited[1]	02811437	United Kingdom	Intermediate holding company
DL Insurance Services Limited[1]	03001989	United Kingdom	Management services
Finsure Premium Finance Limited[1]	01670887	United Kingdom	Non-trading company
Inter Group Insurance Services Limited[1]	02762848	United Kingdom	Dormant[7]
UK Assistance Accident Repair Centres Limited[1]	02568507	United Kingdom	Motor vehicle repair services
UK Assistance Limited[1]	02857232	United Kingdom	Dormant[7]
U K Insurance Business Solutions Limited[1]	05196274	United Kingdom	Insurance intermediary services
U K Insurance Limited[2,3]	01179980	United Kingdom	General insurance
Indirectly held by the Company:			
10-15 Livery Street, Birmingham UK Limited[4]	JE109119	Jersey	Dormant[8]
Brolly UK Technology Limited[1,5]	10134039	United Kingdom	Insurance intermediary services
Churchill Insurance Company Limited[1]	02258947	United Kingdom	General insurance
Direct Line Insurance Limited[1]	01810801	United Kingdom	Dormant[7]
DL Support Services India Private Limited[6]	See footnote 6	India	Support and operational services
DLG Legal Services Limited[2]	08302561	United Kingdom	Legal services
DLG Pension Trustee Limited[1]	08911044	United Kingdom	Dormant[7]
Farmweb Limited[1]	03207393	United Kingdom	Dormant[7]
Green Flag Group Limited[2]	02622895	United Kingdom	Intermediate holding company
Green Flag Holdings Limited[1]	03577191	United Kingdom	Intermediate holding company
Green Flag Limited[2]	01003081	United Kingdom	Breakdown recovery services
Intergroup Assistance Services Limited[1]	03315786	United Kingdom	Dormant[7]
National Breakdown Recovery Club Limited[1]	02479300	United Kingdom	Dormant[7]
Nationwide Breakdown Recovery Services Limited[1]	01316805	United Kingdom	Dormant[7]
The National Insurance and Guarantee Corporation Limited[1]	00042133	United Kingdom	Dormant[7]
UKI Life Assurance Services Limited[1]	03034263	United Kingdom	Dormant[7]

Notes:

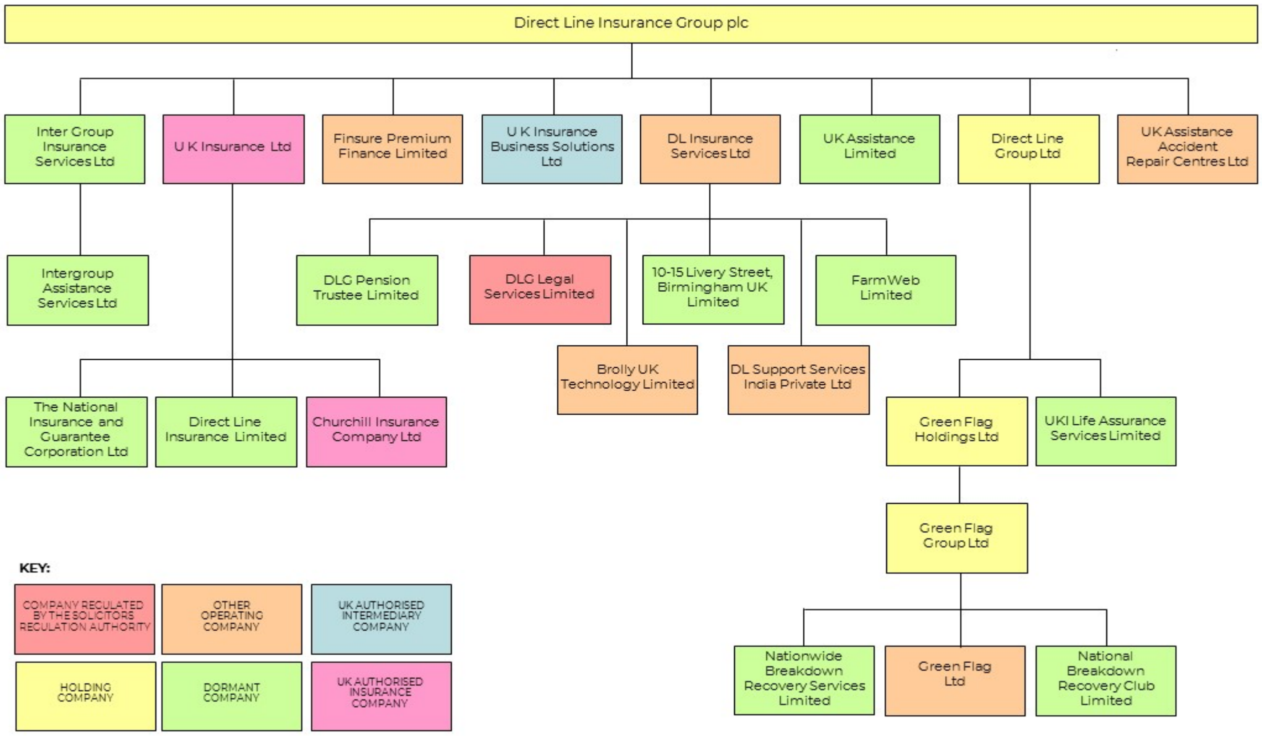
1. Registered office at: Churchill Court, Westmoreland Road, Bromley, BR1 1DP.
2. Registered office at: The Wharf, Neville Street, Leeds, LS1 4AZ.
3. U K Insurance Limited has a branch in the Republic of South Africa and a branch in the Republic of Ireland.
4. Registered office at: 22 Grenville Street, St Helier, JE4 8PX, Jersey.
5. On 15 September 2020, DL Insurance Services Limited acquired 100% of the issued share capital of Brolly UK Technology Limited. For the year ended 31 December 2021, Brolly UK Technology Limited is exempt from the requirement of the Companies Act 2006 relating to the audit of individual accounts by virtue of section 479 A(2)(d).
6. Registered office at: ESC House, 155 1st & 2nd Floor, Okhla Industrial Area Phase-3, New Delhi, 110020, India. Company registration number: U74140DL2014FTC265567.
7. These entities have not been audited in accordance with the exemptions available for dormant entities under section 480 of the Companies Act 2006.
8. Under the Companies (Jersey) Law 1991, there is no requirement to file individual accounts and audit a private limited company.

A. BUSINESS AND PERFORMANCE continued

Group structure

Direct Line Group legal entity structure as at 31 December 2021

All current legal entities



Branch

The Group has a small amount of business in the Republic of Ireland, servicing a small Irish part of a UK partner's wider business. Accordingly, following approval from the Central Bank of Ireland the Group established an Irish branch in the Republic of Ireland with effect from 1 January 2021.

Lines of business

The Group provides motor, home, rescue and other personal lines and commercial insurance products. The Group is Britain's leading personal motor insurer measured by in-force policies, mainly represented through its well-known brands Direct Line, Churchill, Privilege and Darwin, and also through its partners.

The Group is one of Britain's leading personal home insurers. The Group reaches its customers by selling home insurance products through its brands Direct Line, Churchill and Privilege, and its partner NatWest Group.

The Group is one of the leading providers of rescue and pet insurance in the UK. The Group's rescue brand, Green Flag, is the third largest roadside recovery provider. The Group is also the fourth largest pet insurer.

The Group protects commercial businesses through its brands NIG, Direct Line for Business and Churchill. NIG sells products exclusively through brokers operating across the UK, whilst Direct Line for Business sells its products directly to customers, and Churchill sells its products directly to customers and through price comparison websites ("**PCW**").

Motor vehicle liability insurance

The Group's personal and commercial lines motor vehicle liability insurance products provide cover against third-party property damage and bodily injury liability cover.

Other motor insurance

The Group's personal and commercial lines other motor insurance products provide cover against accidental damage, fire, theft and windscreen damage.

Fire and other damage to property insurance

The Group's personal lines home and commercial lines insurance products provide cover against accidental damage, escape of water, fire, subsidence, theft and weather (including storms and flooding).

General liability insurance
The Group's commercial lines general liability insurance products provide cover against personal accident, employers' liability, public liability for injury, public liability to property and disease.

Income protection insurance
The Group's creditor income protection insurance product includes cover in the event of being unable to continue working.

Legal expenses insurance
The Group offers legal expenses insurance cover that includes motor legal protection and family legal protection, including for employment disputes and personal injury. The cost of settling a claim made by a non-fault policyholder under a motor legal protection policy will be incurred by the third-party insurer. However, if a claim is made by a third party against an at-fault Group policyholder, the cost to the Group will be included in motor liability or other motor insurance claims and not in legal expenses claims.

Assistance
The Group's personal lines assistance products cover motor rescue, car hire and travel (including cancellation, medical and non-medical expenses).

Miscellaneous financial loss
The Group's personal and commercial lines miscellaneous financial loss products include creditor protection for unemployment, pet, including veterinary fees, home response and emergency, pecuniary loss for business interruption and commercial special risks.

Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations
The Group's personal and commercial lines insurance products provide cover for motor vehicle liability insurance and general liability insurance that can be settled by a periodic payment order ("**PPO**") as awarded by a court under the Courts Act 2003. As the Group has no non-life insurance contracts relating to health insurance obligations, future references within this document to 'Annuities from non-life' refer only to non-life annuities not relating to health insurance.

Geographical areas
The Group carries out its business primarily in the United Kingdom; a small number of policies are sold in the Republic of Ireland.

Significant business or other events
There are no significant business or other events to report in respect of the year ended 31 December 2021.

A.2 Underwriting performance

The allocation of IFRS premiums, claims and expenses to Solvency II lines of business is an allocation that is performed for the purpose of producing Quantitative Reporting Templates and the SFCR and is based on simplified allocations. The Group does not report its IFRS performance internally by Solvency II lines of business. The Board manages the Group primarily by product type and presents a segmental analysis in the Group's Annual Report & Accounts 2021 on page 206 on that basis. The segments, which are all UK based, reflect the management structure whereby a member of the Executive Committee is accountable to the Chief Executive Officer for each of the operating segments. For an understanding of the Group's IFRS performance, consistent with how the Group is managed, the Finance review starting on page 32, the Operating review starting on page 46 and the financial statements starting on page 176 in the Group's Annual Report & Accounts 2021 provide more relevant information.

Group – by line of business

For year ended 31 December 2021	Motor vehicle liability insurance £m	Other motor insurance £m	Fire and other damage to property insurance £m	General liability insurance £m	Income protection insurance £m	Legal expenses insurance £m	Assistance £m	Misc. financial loss £m	Annuities from non-life £m	Total £m
Gross written premium	1,167.4	562.7	876.3	107.8	4.5	75.5	271.9	105.5	—	**3,171.6**
Gross earned premium	1,190.7	564.1	857.2	105.6	4.5	76.3	264.5	105.1	—	**3,168.0**
Reinsurers' share	(141.6)	—	(61.9)	(5.4)	—	—	(0.7)	(1.0)	—	**(210.6)**
Net earned premium	1,049.1	564.1	795.3	100.2	4.5	76.3	263.8	104.1	—	**2,957.4**
Gross claims	(862.1)	(265.4)	(404.5)	(15.8)	(0.8)	(15.2)	(66.2)	(82.0)	(14.0)	**(1,726.0)**
Reinsurers' share	172.0	—	15.8	(0.2)	—	0.5	(8.5)	12.1	4.9	**196.6**
Net claims	(690.1)	(265.4)	(388.7)	(16.0)	(0.8)	(14.7)	(74.7)	(69.9)	(9.1)	**(1,529.4)**
Expenses incurred	(376.1)	(196.2)	(329.0)	(41.4)	(3.9)	(15.9)	(135.8)	(26.6)	(0.1)	**(1,125.0)**
Underwriting profit/ (loss)	**(17.1)**	**102.5**	**77.6**	**42.8**	**(0.2)**	**45.7**	**53.3**	**7.6**	**(9.2)**	**303.0**

Group – by line of business

For year ended 31 December 2020	Motor vehicle liability insurance £m	Other motor insurance £m	Fire and other damage to property insurance £m	General liability insurance £m	Income protection insurance £m	Legal expenses insurance £m	Assistance £m	Misc. financial loss £m	Annuities from non-life £m	Total £m
Gross written premium	1,245.5	514.9	828.3	97.2	5.0	76.0	307.8	105.7	—	3,180.4
Gross earned premium	1,248.9	518.1	823.6	94.6	5.0	77.1	316.5	105.5	—	3,189.3
Reinsurers' share	(167.7)	—	(54.8)	(4.6)	—	—	(0.7)	(1.0)	—	(228.8)
Net earned premium	1,081.2	518.1	768.8	90.0	5.0	77.1	315.8	104.5	—	2,960.5
Gross claims	(579.0)	(235.4)	(398.1)	(34.5)	(2.8)	(4.4)	(158.8)	(62.0)	(47.4)	(1,522.4)
Reinsurers' share	(35.9)	—	10.7	3.9	—	(0.6)	17.9	(12.0)	32.8	16.8
Net claims	(614.9)	(235.4)	(387.4)	(30.6)	(2.8)	(5.0)	(140.9)	(74.0)	(14.6)	(1,505.6)
Expenses incurred	(387.3)	(180.6)	(329.3)	(41.2)	(4.2)	(13.8)	(176.5)	(28.1)	—	(1,161.0)
Underwriting profit/ (loss)	79.0	102.1	52.1	18.2	(2.0)	58.3	(1.6)	2.4	(14.6)	293.9

The difference between underwriting profit on a Solvency II basis and underwriting profit on an IFRS basis relates to non-technical expenses. Non-technical expenses in 2021 were £11.5 million (2020: £26.1 million).

The table below reconciles underwriting profit to profit before tax:

For the year ended 31 December	**2021 £m**	2020 £m
IFRS underwriting profit	**303.0**	293.9
Non-technical expenses	**(11.5)**	(26.1)
Investment return	**146.3**	95.1
Instalment and other income	**144.0**	159.2
Operating profit	**581.8**	522.1
Restructuring and one-off costs	**(101.5)**	(39.4)
Finance costs	**(34.3)**	(31.3)
IFRS profit before tax	**446.0**	451.4

Direct Line Insurance Group plc is the ultimate holding company for a vertically integrated general insurance group which has outsourced to companies within the Group the delivery of certain services and claims activities, for example the repair of motor vehicles. The cost of claims in UKI represents the full cost of claims to the company, whereas in the consolidated Group, claims represents the cost less margin generated from such outsourced activities.

UKI – by line of business

For year ended 31 December 2021	Motor vehicle liability insurance £m	Other motor insurance £m	Fire and other damage to property insurance £m	General liability insurance £m	Income protection insurance £m	Legal expenses insurance £m	Assistance £m	Misc. financial loss £m	Annuities from non-life £m	Total £m
Gross written premium	1,167.4	562.7	876.3	107.8	4.5	75.5	271.9	105.5	—	**3,171.6**
Gross earned premium	1,190.7	564.1	857.2	105.6	4.5	76.3	264.5	105.1	—	**3,168.0**
Reinsurers' share	(141.6)	—	(61.9)	(5.4)	—	—	(0.7)	(1.0)	—	**(210.6)**
Net earned premium	1,049.1	564.1	795.3	100.2	4.5	76.3	263.8	104.1	—	**2,957.4**
Gross claims	(862.1)	(372.0)	(404.5)	(15.8)	(0.8)	(15.2)	(66.2)	(82.0)	(14.0)	**(1,832.6)**
Reinsurers' share	172.0	—	15.8	(0.2)	—	0.5	(8.5)	12.1	4.1	**195.8**
Net claims	(690.1)	(372.0)	(388.7)	(16.0)	(0.8)	(14.7)	(74.7)	(69.9)	(9.9)	**(1,636.8)**
Expenses incurred	(374.6)	(195.8)	(328.7)	(41.2)	(3.9)	(15.8)	(134.4)	(26.5)	—	**(1,120.9)**
Underwriting profit/ (loss)	**(15.6)**	**(3.7)**	**77.9**	**43.0**	**(0.2)**	**45.8**	**54.7**	**7.7**	**(9.9)**	**199.7**

UKI – by line of business

For the year ended 31 December 2020	Motor vehicle liability insurance £m	Other motor insurance £m	Fire and other damage to property insurance £m	General liability insurance £m	Income protection insurance £m	Legal expenses insurance £m	Assistance £m	Misc. financial loss £m	Annuities from non-life £m	Total £m
Gross written premium	1,245.5	514.9	828.3	97.2	5.0	76.0	307.8	105.7	—	3,180.4
Gross earned premium	1,248.9	518.1	823.6	94.6	5.0	77.1	316.5	105.5	—	3,189.3
Reinsurers' share	(167.7)	—	(54.8)	(4.6)	—	—	(0.7)	(1.0)	—	(228.8)
Net earned premium	1,081.2	518.1	768.8	90.0	5.0	77.1	315.8	104.5	—	2,960.5
Gross claims	(578.1)	(298.8)	(398.1)	(34.5)	(2.8)	(4.4)	(159.1)	(62.1)	(46.3)	(1,584.2)
Reinsurers' share	(35.9)	—	10.7	3.9	—	(0.6)	17.9	(12.0)	30.7	14.7
Net claims	(614.0)	(298.8)	(387.4)	(30.6)	(2.8)	(5.0)	(141.2)	(74.1)	(15.6)	(1,569.5)
Expenses incurred	(386.6)	(180.4)	(329.8)	(41.0)	(4.2)	(13.7)	(174.9)	(28.0)	—	(1,158.6)
Underwriting profit/ (loss)	80.6	38.9	51.6	18.4	(2.0)	58.4	(0.3)	2.4	(15.6)	232.4

CIC – by line of business

	2021		**2020**	
For the year ended 31 December	Annuities from non-life £m	**Total £m**	Annuities from non-life £m	Total £m
Gross written premium	—	**—**	—	—
Gross earned premium	—	**—**	—	—
Reinsurers' share	—	**—**	—	—
Net earned premium	—	**—**	—	—
Gross claims	—	**—**	(1.0)	(1.0)
Reinsurers' share	0.1	**0.1**	1.7	1.7
Net claims	0.1	**0.1**	0.7	0.7
Expenses incurred	(0.1)	**(0.1)**	—	—
Underwriting profit	**—**	**—**	0.7	0.7

Underwriting performance – Group

UKI is the main underwriting company within the Group. CIC has six historic claims reported in the undertaking.

At a Group level, profit from underwriting performance was £303.0 million, an increase of £9.1 million (2020: £293.9 million). The Group's underwriting performance has been driven by increases in prior-year reserve releases and lower operating costs being partially offset by higher claims frequency in Motor. The combined operating ratio at 90.1%, normalised for weather at 91.1%, was better than the Group's medium-term target of 93% to 95% and in line with the stated mid-year revised expectation for 2021 of between 90% and 92%.

The loss ratio edged up slightly to 58.1% (2020: 57.9%) driven by increases across Motor and Commercial more than offsetting improvements in Home and Rescue and other personal lines. The small deterioration in the loss ratio was more than offset by a lower commission ratio. The commission ratio reduced primarily due to reduced profit share payments, particularly on packaged bank accounts and Home partnerships, partially offset by increased commission payments in Commercial.

Prior-year reserve releases increased to £258.1 million during 2021 (2020: £173.8 million) and were concentrated towards more recent accident years. Prior-year reserve releases were higher across all categories, but mainly on Home, which benefited from favourable experience on escape of water, flood, storm and fire perils and Motor, mainly from large bodily injury reserves as uncertainty arising from Covid-19 and Brexit reduced.

During 2021, the impact of Covid-19 was less significant than in the previous year where it caused a modest overall indirect economic benefit. Whilst Motor claims frequency remained below pre-pandemic levels in H1, it increased back to expected levels during H2 and Motor saw elevated severity inflation in damage claims throughout the year. Throughout 2021 motor market premiums reduced, in part reflecting this trend. Outside of Motor the impact of Covid-19 was less significant. Rescue saw lower new business shopping during lockdown restrictions whilst claims experience in Home and Commercial was not significantly affected. The expense ratio reduced following progress on the Group's cost-saving initiatives, partially offset by increased levies, depreciation and amortisation charges relating to the launch of the Group's new technology platforms.

Analysis by line of business

Motor vehicle liability insurance

Gross written premium for motor vehicle liability insurance was £1,167.4 million in 2021, a decrease of £78.1 million (2020: £1,245.5 million). Motor in-force policies reduced by 2.2% to 4.0 million (2020: 4.1 million) with own brand in-force policies down by 1.9% at 3.9 million.

There were two major trends in the motor market during 2021. Firstly, against the backdrop of deflationary market conditions driven by claims frequency remaining below pre-pandemic levels and the impact of the Whiplash reforms, the Group remained disciplined and focused on maintaining target loss ratios. Secondly, following the implementation of the Motor platform the Group saw improved competitiveness, enabling it to hold policy count flat across H2 despite its average premiums reducing 2.5% in 2021 compared to the market reducing 7%. Maintaining discipline during 2021 was especially important as Motor claims severity inflation was above the medium-term 3% to 5% per year inflation expectations due to high levels of inflation in second-hand vehicles and additional Covid-19 related cleaning costs.

The Group offered premium refunds to customers where miles driven were expected to be lower than anticipated at policy inception. In particular, the Group continued the "Mileage MoneyBack" proposition for all Direct Line customers such that customers would be able to receive a refund at the end of the policy period where they had driven less than expected.

The underwriting loss of £17.1 million was a decrease of £96.1 million (2020: profit of £79.0 million) as lockdown restrictions eased in H2 2021 and claims frequency increased back to expected levels.

Other motor insurance

Gross written premium for other motor insurance of £562.7 million in 2021, was an increase of £47.8 million compared to the prior year (2020: £514.9 million).

The underwriting profit of £102.5 million was an increase of £0.4 million (2020: £102.1 million) broadly in line with the prior year.

Fire and other damage to property insurance

Gross written premium for fire and other damage to property insurance, increased by £48.0 million to £876.3 million in 2021 compared to the prior year (2020: £828.3 million). In-force policies for Home's own brands increased by 2.3% in 2021 to 1.9 million policies.

Retention levels remained high, whilst new business sales grew across direct channels reflecting improved competitiveness in a strong new business market in H1. The market became increasingly competitive across H2 as the Group approached the implementation of the Pricing Practices Review regulations. Against this deflationary backdrop the Group maintained its discipline in relation to new business particularly in the PCW channel.

The underwriting profit of £77.6 million was an increase of £25.5 million (2020: £52.1 million), driven by lower weather-related costs and higher prior-year reserves releases.

General liability insurance

Gross written premium for general liability insurance was £107.8 million in 2021, an increase of £10.6 million (2020: £97.2 million). The underwriting profit of £42.8 million was higher than the previous year (2020: £18.2 million), which was primarily due to higher general liability reserve releases.

Legal expenses insurance

Gross written premium for legal expenses insurance was £75.5 million in 2021, a decrease of £0.5 million (2020: £76.0 million). The underwriting profit decreased by £12.6 million to £45.7 million (2020: £58.3 million).

The cost of settling a claim made by a non-fault policyholder under a motor legal protection policy will be incurred by the third-party insurer. However, if a claim is made by a third-party policyholder under their motor legal protection policy against an at-fault Group policyholder, the cost will be included in motor vehicle liability insurance claims or other motor insurance claims.

Assistance

Gross written premium for assistance, £271.9 million, decreased by £35.9 million (2020: £307.8 million). Strong growth in Green Flag Rescue increased in-force policies by 5.8% to 1.2 million which was offset by reductions in Other personal lines (comprising Travel, Pet and other) in-force policies by 1.8% to 3.6 million primarily due to reductions in travel partnerships volumes. The underwriting profit of £53.3 million increased by £54.9 million (2020: underwriting loss £1.6 million).

Miscellaneous financial loss

Gross written premium for miscellaneous financial loss of £105.5 million was £0.2 million lower compared to the prior year (2020: £105.7 million). The underwriting profit of £7.6 million was an increase of £5.2 million (2020: £2.4 million) primarily caused by lower consequential loss.

Annuities from non-life insurance contracts, other than health obligations

The underwriting loss of £9.2 million in 2021 showed an improvement on the prior year (2020: underwriting loss £14.6 million).

Income protection

Income protection insurance is no longer sold. There are no significant movements between periods.

A.3 Investment performance

Investment return

Group

For the year ended 31 December	2021 £m	2020 £m
Investment income	**116.0**	127.1
Hedging to a sterling floating rate basis	**(13.3)**	(20.3)
Net investment income	**102.7**	106.8
Net realised and unrealised gains/(losses) excluding hedging	**43.6**	(11.7)
Total investment return	**146.3**	95.1

UKI

For the year ended 31 December	2021 £m	2020 £m
Investment income	**116.0**	126.3
Hedging to a sterling floating rate basis	**(13.3)**	(20.3)
Net investment income	**102.7**	106.0
Net realised and unrealised gains/(losses) excluding hedging	**44.2**	(10.9)
Total investment return	**146.9**	95.1

The Group's investment strategy aims to deliver several objectives, which are summarised below:

- to ensure there is sufficient liquidity available within the investment portfolio to meet stressed liquidity scenarios;
- to match periodic payment order and non-periodic payment order liabilities in an optimal manner; and
- to deliver a suitable risk-adjusted investment return commensurate with the Group's risk appetite.

Total investment return increased by £51.2 million to £146.3 million (2020: £95.1 million) primarily reflecting positive fair value adjustments in investment properties in 2021 versus write downs in 2020, as well as increasing the gains from debt security disposals year on year.

The investment income yield for 2021 reduced to 1.9% (2020: 2.1%), driven by the lower investment rates driven by central banks' policy actions in 2020,

Investment return for UKI increased by £51.8 million to £146.9 million (2020: £95.1 million), in line with the increase in Group.

Investment yield

Group

For the year ended 31 December	2021	2020
Investment income yield[1]	**1.9%**	2.1%
Investment return yield[2]	**2.4%**	1.6%

UKI

For the year ended 31 December	2021	2020
Investment income yield[1]	**2.0%**	2.2%
Investment return yield[2]	**2.6%**	1.6%

Notes:

1. The income earned from the investment portfolio, recognised through the income statement during the period (excluding unrealised and realised gains and losses, impairments and fair value adjustments) divided by the average assets under management. The average assets under management derives from the period's opening and closing balances for the total Group or UKI.
2. The investment return divided by the average assets under management. The average assets under management derives from the period's opening and closing balances.

Investment income by asset class

Group

For the year ended 31 December	2021 £m	2020 £m
Investment AFS credit	**70.9**	76.3
Investment grade held-to-maturity private placements	**2.4**	2.7
High yield	**17.5**	18.9
Credit	**90.8**	97.9
Sovereign	**0.1**	0.7
Total debt securities	**90.9**	98.6
Infrastructure debt	**4.4**	5.8
Cash and cash equivalents	**0.2**	2.5
Commercial real estate loans	**6.0**	6.5
Investment property	**14.5**	13.7
Total investment income	**116.0**	127.1

UKI

For the year ended 31 December	2021 £m	2020 £m
Investment AFS credit	**70.9**	76.7
Investment grade held-to-maturity private placements	**2.4**	2.7
High yield	**17.5**	18.9
Credit	**90.8**	98.3
Sovereign	**0.1**	0.7
Total debt securities	**90.9**	99.0
Infrastructure debt	**4.4**	5.8
Cash and cash equivalents	**0.2**	1.8
Commercial real estate loans	**6.0**	6.5
Investment property	**14.5**	13.2
Total investment income	**116.0**	126.3

Investment expenses

Group

For the year ended 31 December	2021 £m	2020 £m
Total investment expenses	**9.5**	9.0

UKI

For the year ended 31 December	2021 £m	2020 £m
Total investment expenses	**9.5**	9.0

Gains and losses recognised in equity

Group

For the year ended 31 December	2021 £m	2020 £m
Fair value (loss)/gain on AFS investments	**(84.1)**	47.4
Less: net gains on AFS investments transferred to income statement on disposals	**(7.9)**	(1.1)
Tax relating to items that may be reclassified	**17.1**	(9.9)
Movement in AFS reserves during the year	**(74.9)**	36.4

UKI

For the year ended 31 December	2021 £m	2020 £m
Fair value (loss)/gain on AFS investments	**(86.0)**	50.0
Less: realised net losses/(gains) on AFS investments included in income statement	**(8.0)**	2.4
Tax relating to items that may be reclassified	**17.2**	(11.1)
Movement in AFS reserves during the year	**(76.8)**	41.3

Investment in securitised credit

The Group does not hold any securitised credit assets within its investment portfolio.

A.4 Performance of other activities

Instalment and other operating income

Group

For the year ended 31 December	2021 £m	2020 £m
Instalment income	**97.3**	109.3
Other operating income:		
Revenue from vehicle recovery and repair services	**19.7**	24.0
Vehicle replacement referral income	**13.1**	12.2
Legal services income	**7.2**	8.8
Other income[1]	**6.7**	4.9
Other operating income	**46.7**	49.9
Total instalment and other operating income	**144.0**	159.2

Instalment and other operating income, which is primarily driven by premium and claims volumes decreased by £15.2 million to £144.0 million. Instalment income fell primarily due to lower Motor gross written premium, whereas other operating income reduced primarily due to a reduction in external Motor repair income and lower recovery after accident volumes.

Note:

[1] Other income includes fee income from insurance intermediaries.

UKI

For the year ended 31 December	2021 £m	2020 £m
Instalment income	**97.3**	109.3
Other operating income:		
Vehicle replacement referral income	**13.1**	12.2
Other income	**3.5**	2.9
Other operating income	**16.6**	15.1
Total instalment and other operating income	**113.9**	124.4

Operating commitments where the Group/UKI is the lessor

The following tables analyse future aggregate minimum undiscounted lease payments receivable under non-cancellable operating leases in respect of property leased to third-party tenants.

Group

	2021 £m	2020 £m
Within one year	**13.1**	13.7
In the second to fifth years inclusive	**38.4**	38.6
After five years	**70.0**	66.5
Total	**121.5**	118.8

UKI

	2021 £m	2020 £m
Within one year	**12.8**	13.6
In the second to fifth years inclusive	**37.4**	38.2
After five years	**69.2**	66.5
Total	**119.4**	118.3

A.5 Any other information

Other regulatory changes

The FCA’s Pricing Practices rules came into effect on 1 January 2022. The Group maintains a constructive and open relationship with its regulators and has a strong culture of delivering on its commitments to its customers. Pricing practices within the general insurance market has remained a key area of focus for the FCA and for the Group. The Group has devoted a lot of attention and resource with the intention of enabling the Group to meet the FCA’s Pricing Practices Review requirements within the challenging deadlines prescribed by the FCA, and to be in a position to deliver the intended customer outcomes. Focus has also been given to the ability of the Group to trade effectively post the implementation of the FCA's Pricing Practices Review requirements.

Covid-19

Whilst in 2020 the Group saw a modest indirect economic benefit from the Covid-19 pandemic in its results, during 2021 the impact was less marked. Within Motor, the Group saw similarly low levels of claims frequency across the first half of 2020 and 2021 and with restrictions easing across H2 2021 it saw claims frequency increase back to expected levels. Throughout 2021 motor market premiums reduced, in part reflecting this trend and offsetting the financial impact.

Outside of Motor the impact of Covid-19 was even less significant. Rescue saw lower new business shopping during lockdown restrictions whilst claims experience in Home and Commercial was not significantly affected.

For Travel business, lower customer travel levels continued to reduce gross written premium below pre-pandemic levels and claims volumes reduced in 2021 following the non-repeat of Covid-19 related claims in 2020.

UK weather

During February 2022, the UK experienced three significant storms: Dudley, Eunice and Franklin. To date, the Group has already helped over 10,000 customers across Home and Commercial and estimates claims to be between £30 million and £40 million. This is an early estimate and is within the Group’s annual weather budget assumption for 2022.

New partnership

In July 2021, the Group announced its new partnership with Motability Operations demonstrating the Group’s core strengths in delivering great customer service and efficient car repairs. The scheme serves over 640,000 people and is anticipated to increase Motor gross written premium by around £500 million each year from H2 2023.

Ukraine conflict

The Group is deeply saddened and shocked by the conflict in Ukraine and has made an immediate donation from the Group's Community Fund to the UK's DEC Ukraine Humanitarian Appeal. As a UK-based business, there has been no direct impact from the conflict in Ukraine that started in February 2022. The investment portfolio has no direct exposure to Russia or Ukraine.

Events after the reporting period

As part of the Group's ongoing change of the core operational real estate portfolio, on 28 February 2022, the freehold interest in the Birmingham property with a carrying value of £24.4 million and impaired by £5.0 million to reflect the costs of remediation and estimated realisable value, was sold for £19.4 million.

On 4 March 2022, UKI entered into an agreement to extend its contract with NatWest Group until 2027 to continue to provide home insurance for its customers.

SECTION B: SYSTEM OF GOVERNANCE (UNAUDITED)

In this section:

B. SYSTEM OF GOVERNANCE

This section provides information regarding the system of governance of the Group. References to Group include the Group's regulated insurance companies UKI and CIC.

Assessment of the adequacy of the Group's system of governance

The Board is responsible for overseeing the implementation of a robust control framework to allow effective management of risk. The Board supervises the Group's operations, with a view to ensuring they are effectively managed, that effective controls are in place and that risks are assessed and managed appropriately.

The Group's governance framework is detailed in the Group's High Level Control and System of Governance Framework document. This document also details how the Group meets Solvency II and the PRA requirements to identify key functions and to have and maintain a Responsibilities Map in respect of the PRA and FCA's Senior Managers and Certification Regime requirements. The Board reviews this document annually.

The Group operates a Three Lines of Defence model. An explanation of these responsibilities can be found on page 89 of the Group's Annual Report & Accounts 2021 at www.directlinegroup.co.uk/en/investors

During the year the Board approved the Group's Own Risk and Solvency Assessment following detailed review and challenge to management by the Board Risk Committee. The governance process for the 2021 Own Risk and Solvency Assessment report included engagement with and challenge from Risk Management Committee members, the Chair of the Board Risk Committee, the Chair of the Audit Committee and the Board. The Group adhered to a fully documented and audited process to produce the 2021 Own Risk and Solvency Assessment report, in line with Solvency II requirements.

The conclusions of the Own Risk and Solvency Assessment are taken into consideration in assessing the Group's risk and capital position related to the strategic plan and approved by the Board. The 2021 Own Risk and Solvency Assessment report summarised five key areas relating to the strategic plan:

- plan, including the vision and risk appetite;
- risks to the plan;
- notable and changing risks;
- forecast capital and solvency position on a Solvency II basis; and
- stress test of the plan.

The 2021 Own Risk and Solvency Assessment report contained additional information including an assessment of: non-quantifiable risks, appropriateness of the standard formula, technical provisions and the outcomes of stress and scenario tests and reverse stress tests.

The Group has identified certain principal risks as being applicable to the Group, for example as referred to in the Own Risk and Solvency Assessment and those summarised in the Group's Annual Report & Accounts 2021, and assesses robustly those principal risks. The Board sets and monitors adherence to the risk strategy, risk appetite and risk framework. Within this overall context, the Board has over time approved a system of governance which is referred to in the High Level Control and System of Governance document and which includes the Matters Reserved to the Board, the Board Committees' terms of reference, risk appetite statements, the Enterprise Risk Management Strategy and Framework, Group policies and minimum standards.

The Board, with the assistance of the Board Risk Committee and the Audit Committee, and support from the Risk and Group Audit functions as appropriate, monitored the Company's risk management and internal control systems that have been in place throughout the year under review, and reviewed their effectiveness. The monitoring and review covered all material controls, including financial, operational and compliance controls.

The Risk function annually produces an Internal Risk and Control Assessment Statement to support the Board in monitoring the effectiveness of the Group's risk management and internal control systems. Each function completes a self-assessment of its risks and key controls and an Executive Sponsor, responsible for the function, attests to the status of the effectiveness of the risk management and internal control systems. The Risk function reviews and challenges these findings and the Group Audit function provides an independent assessment of the overall effectiveness of the governance and risk and control framework of the Group. The overall findings are combined into a Group-level assessment.

The Group Audit function supports the Board by providing an independent and objective assurance of the adequacy and effectiveness of the Group's controls. It brings a systematic and disciplined approach to evaluating and improving the effectiveness of the Group's risk management, control and governance frameworks and processes. Group Audit's 2021 annual assessment of the risk management, governance and control environment did not identify any matters that conflict with the 2021 Internal Risk and Control Assessment Statement.

On behalf of the Board, the Board Risk Committee reviewed the 2021 Internal Risk and Control Assessment Statement and was satisfied with the conclusion that the Group's risk management systems were fit for purpose for managing all material risks and that its internal control systems were effective for managing all key controls, including financial, operational and compliance controls. The Board Risk Committee also regularly reviews significant risks and how they might affect the Group's financial position, comparisons to agreed risk appetites and what the Group does to manage risks outside its appetite.

On behalf of the Board, the Audit Committee regularly reviews the effectiveness of the Group's internal control systems. Its monitoring covers all material controls. Principally, it reviews and challenges reports from management, the Group Audit function and the External Auditor. This enables it to consider how to manage or mitigate risk in line with the Group's risk strategy.

The Board confirms that there is an ongoing process for assessing the Company's risk management and internal control systems and identifying, evaluating and managing the significant risks faced by the Group, which has been in place throughout the period and up to the date of this report. The Board takes the view that, on the basis of the assessment carried out in and in respect of 2021, it would be reasonable to conclude that the Group's risk management and internal control systems are effective. The Directors acknowledge that any internal control system can manage, but not eliminate, the risk of not achieving business objectives. It can only provide reasonable, not absolute, assurance against material misstatement or financial loss.

B.1 General information on the system of governance

The Boards

The Boards are comprised of the same persons and act as the Administrative, Management or Supervisory Body.

For details of the Company's Board, visit the Group's corporate website at www.directlinegroup.co.uk/en/who-we-are/leadership

The Board has a collective objective of promoting the long-term success of the Company for its shareholders and provides leadership of the Company. The Board's specific duties are set out in the Schedule of Matters Reserved for the Board, which contains items reserved for the Board to consider and approve, relating to strategy and management, material contracts, financial reporting and controls, internal controls and risk management, Board membership and succession planning, corporate governance, structure and capital, and delegation of authority. In addition to the Schedule of Matters Reserved for the Board, each Board Committee has written terms of reference defining its role and responsibilities.

Details regarding Board meetings and Board activity during 2021 can be found on pages 106 to 107 of the Group's Annual Report & Accounts 2021 at www.directlinegroup.co.uk/en/investors

Structure of the Board, Board Committees and executive management

A summary of the role of the Board, its six Committees (Audit Committee, Board Risk Committee, Nomination and Governance Committee, Remuneration Committee, Sustainability Committee and Investment Committee) and the responsibilities of the Chairman, the Chief Executive Officer and executive management can be found on page 113 of the Group's Annual Report & Accounts 2021 at www.directlinegroup.co.uk/en/investors

The terms of reference of these Committees are available at www.directlinegroup.co.uk/en/who-we-are/leadership/board-committees

The Board is responsible for ensuring there is an appropriate system of governance in operation throughout the Group. This includes a robust system of internal controls and a sound risk management framework.

The Group's governance framework is detailed in the Group's High Level Control and System of Governance Framework document. This document details how the Group meets Solvency II and PRA requirements to identify Key Functions and to have and maintain a Responsibilities Map in respect of the PRA and FCA Senior Managers and Certification Regime requirements. The Board reviews these documents annually.

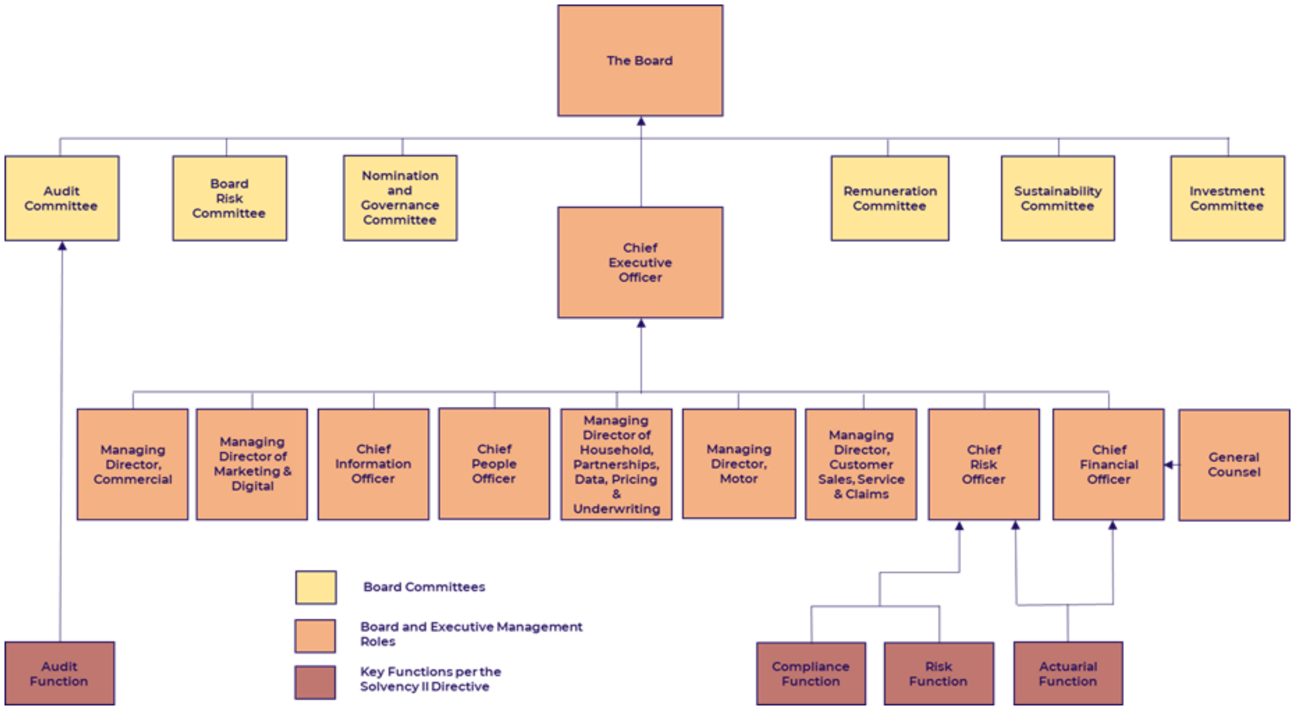
The core elements of the Governance Framework are the:

- Matters Reserved for the Board and the Board Committees' Terms of Reference;
- High Level Control and System of Governance Framework document;
- Risk Appetite statements;
- Enterprise Risk Management Strategy and Framework, which sets out the Group's approach to setting risk strategy and for managing risks to the strategic objectives and day-to-day operations of the business;
- Group policies, which address specific risk areas, are aligned to the Group's risk appetite, and inform the business how it needs to conduct its activities to remain within risk appetite; and
- minimum standards, which interpret the Group policies into a set of requirements that can be implemented throughout the Group.

Further details regarding the split of responsibilities for the different parts of the Group's governance framework can be found on page 112 of the Group's Annual Report & Accounts 2021 at www.directlinegroup.co.uk/en/investors

Solvency II Key Functions

Set out below is a diagram highlighting the day to day reporting lines of the Key Functions as required by Solvency II:



Note:

1. The responsibilities of the Actuarial function holder are split between the Actuarial Director and the Director of Financial Risk.

Further information on the authority, resources and the independence of the four Solvency II Key Functions identified above is set out in sections B.3 to B.6 of this report.

Those working in the Solvency II Key Functions are subject to the provisions of the Fit and Proper minimum standard (see section B.2) which requires them to have the necessary skills, knowledge and experience to fulfil their position. This is assessed both on initial appointment and through annual performance appraisals.

Material changes in the system of governance

There have been no material changes to the Company's system of governance during the reporting period.

Information on remuneration policy and practices

Introduction

The Group believes that employees are critical to the success of the Group's business, both now and into the future. As a result, the Group's remuneration policy aims to provide, in the context of the Group's business strategy, an attractive reward proposition at the right cost to attract, retain, motivate and reward high calibre employees so that they are engaged to deliver superior long-term business performance within acceptable risk parameters and having due regard to all relevant regulatory guidance.

Executive Directors: Principles of remuneration policy

The Directors' remuneration policy was approved at the Company's Annual General Meeting in 2020, The policy provides a clear and simple framework for remuneration of the Company's Directors and aligning the Executive Directors' variable pay opportunities to the business strategy and achievement of the Company's performance indicators.

The table on the next page summarises the implementation of the elements of Executive Directors' remuneration in 2021.

Key feature	Implementation in 2021
Base salary Reviewed annually with any increases taking effect on 1 April. The Remuneration Committee considers a range of factors when determining salaries, including pay increases throughout the Group, individual performance and market data.	The Chief Executive Officer's salary remains appropriate at £817,000. At the 2021 AGM, the Chief Financial Officer stepped down. No salary increase was given prior to him stepping down. A new Chief Financial Officer was appointed at the conclusion of the 2021 AGM on a salary of £515,000.
Pensions Pension contributions are paid only in respect of base salary. The Executive Directors' pension is set in line with the pension level received by the majority of the employee population.	Chief Executive Officer and Chief Financial Officer pension contribution remains at 9% (in line with workforce).
Annual Incentive Plan ("AIP") Maximum opportunity at 175% of salary for the Chief Executive Officer and Chief Financial Officer. At least 50% of the AIP is based on financial measures. The Remuneration Committee considers various non-financial performance measures such as strategic measures. It bases its judgement on the payment outcome at the end of the performance period on its assessment of the level of performance achieved with reference to performance targets agreed at the start of the year. Any payment is subject to an additional gateway assessment, including assessing risk factors. Malus and clawback provisions apply.	No change to the maximum opportunity. No change from the weightings or measures used for 2020. There will be a straight-line vesting between AIP threshold and maximum performance. Financial measures (55%): Profit before tax. Non-financial measures (45%): People, Customers and Shared. The performance targets were set following the usual process, considering internal and consensus forecasts and the key strategic priorities for the Group in 2021. The performance targets were considered commercially sensitive and therefore are disclosed in the 2021 Annual Report & Accounts.
Deferred Annual Incentive Plan ("DAIP") 40% of the AIP is deferred into shares. Typically vesting after three years, normally subject to continued employment. Malus and clawback provisions apply.	No further performance conditions apply.
Long-Term Incentive Plan ("LTIP") Awards typically granted as nil-cost options. Awards typically granted twice a year. The LTIP allows for awards with a maximum value of 200% of base salary per financial year. Performance is measured over three years. Awards vest subject to financial underpin and payment gateway. Malus and clawback provisions apply. Awards are subject to an additional two-year holding period following the end of the three-year performance period.	No change to the maximum annual award levels. Nil-cost options will continue to be used for the grants. The current 60% Return on tangible equity ("**RoTE**") and 40% Total shareholder return ("**TSR**") mix continued to apply in 2021. A RoTE target range of 17.5% (threshold) and 20.5% (maximum) is required for the 2021 awards to vest. Vesting at threshold is 20% and maximum is 100% with straight-line vesting in between. Relative TSR will be measured against the FTSE 350 (excluding investment trusts) peer group. Vesting for median TSR performance (threshold) is 20% and for upper quintile TSR performance (maximum) is 100% with straight-line vesting in between these points.
Shareholding guidelines	The Chief Executive Officer is subject to a shareholding guideline of 250% of salary. The Chief Financial Officer is subject to a shareholding guideline of 200% of salary. Shares considered will include those held by the director and their connected persons, vested awards subject to holding requirements and unvested awards not subject to performance conditions (on a net of tax basis). Executive Directors are also expected to retain an equivalent level of shareholding post their employment for a period of two years.

Non-Executive Directors: principles of remuneration policy
Non-Executive Directors are paid a basic annual fee. Additional fees may be paid to Non-Executive Directors who chair a Board Committee, sit on a Board Committee, and for the Senior Independent Director to reflect additional responsibilities, as appropriate.

The fees paid to the Chairman include all Board and Committee membership fees and are determined by the Remuneration Committee.

Non-Executive Directors may receive certain expenses, including the reimbursement of travel expenses and accommodation or similar which, consistent with general market practice, will be grossed-up for any tax arising on such expenses.

Reward for employees: principles of remuneration policy
The Group has one consistent reward policy for all levels of employees. Therefore, the same reward principles guide reward decisions for all Group employees, including Executive Directors. However, remuneration packages differ to account for appropriate factors in different areas of the business:

- **Annual Incentive Plan** – approximately 3,700 employees participate in the AIP. The corporate performance measures for all employees are consistent with those used for Executive Directors, although the weighting attributable to those factors may differ. The Group's strategic leaders (approximately 60 employees) also receive part of their bonus in Company shares deferred for three years;
- **Incentive awards** – approximately 4,000 employees, excluding Executive Directors, participate in a function or team specific incentive plan which assesses personal performance over a monthly period. These incentive awards may pay out monthly or quarterly;
- **Long-Term Incentive Plan** – The Group's strategic leaders participate in the LTIP, currently based on the same performance conditions as those for Executive Directors;
- **Restricted Share Plan ("RSP")** – RSP awards are used on a limited basis across the Company to help recruit and retain critical staff, and for talent management. Executive Directors do not receive grants under the RSP;
- **All employee share plans ("SIP")** – the Committee considers it important for all employees to have the opportunity to become shareholders in the Company. The HMRC-approved SIP has operated since 2013, and, in addition, the Company has made periodic awards of free shares. At year-end, approximately 3,900 employees throughout the Group had signed up to these schemes with 9,100 holding free shares in the Company; and
- **Pension and benefits** – depending on employee grade, the Company contributes 9% to the defined contribution pension scheme without any requirement for an employee contribution.

Relative importance of fixed and variable pay
The Company ensures that the fixed and variable remuneration components of remuneration are appropriately balanced, with the fixed portion representing a sufficiently high proportion of total remuneration which allows the operation of a fully flexible policy on variable remuneration components including the possibility to pay no variable remuneration component. Fixed pay comprises base pay, benefits and pension. Fixed pay is set to be competitive against market levels. The Company monitors both the ratio of fixed to variable pay and quantum against the market. In no cases are the fixed components of pay set at levels which would then require undue reliance on incentive pay elements for living costs.

Supplementary pension or early retirement schemes
There are no supplementary pension or early retirement schemes in place for the Board or other Key Function Holders during the reporting period.

Material transactions
CIC has a 100% quota share reinsurance treaty with UKI to recover insurance liabilities that are not satisfied by third-party reinsurers. As at 31 December 2021, the amount of the reinsurance recoverable from UKI was £1.8 million.

On 10 February 2021, U K Insurance Limited signed a contract in relation to its Bromley site to surrender the current lease and DL Insurance Services Limited signed a contract to purchase the head lease. The loss on terminating the lease was £83.9 million and the value of fixed asset capitalised was £19.8 million.

On 8 March 2021, the Group announced that the Board had approved a share repurchase programme of up to £100 million which was completed on 15 November 2021. Across the programme, the Company repurchased and cancelled 33,838,593 Ordinary shares for an aggregate consideration of £101,043,742 (including transaction costs).

Following the £100 million share buyback programme in 2021, and reflecting the strength of the Group's capital position, on 9 March 2022 the Group commenced a further share buyback programme of up to £100 million to be carried out in two tranches and expected to complete in 2022.

B.2 Fit and proper requirements

Skills, knowledge and expertise of the persons who run the Group or Key Functions

The individuals were appointed to their roles following due diligence with the objective of ensuring that they had the necessary competence and were fit and proper to fulfil their positions. In making these assessments of competence due consideration was given to the individuals':

- professional qualifications, knowledge and experience to enable sound and prudent management (fit);
- character, in that they were of good repute and integrity (proper); and
- appearance on the public financial services register, where the person is a Senior Manager.

To support effective operation of this requirement, the Group requires Senior Managers, Certification Functions and Key Function Holders to:

- comply and meet the PRA Insurance Conduct Standards and FCA Conduct Rules, in respect of roles undertaken for UKI and CIC;
- comply with the requirements expected of Senior Managers, Certification Functions and Key Function Holders to meet as set out in the Group's Regulatory Compliance Risk policy, Regulatory Accountabilities minimum standard and Interaction with Regulators minimum standard;
- manage risks and controls that are reflected in their role profiles in accordance with the Enterprise Risk Management Strategy and Framework and as set out in the High Level Control and System of Governance Framework document (the Group's Management Responsibility Map); and
- continue to pass the fit and proper self-assessment as part of the annual declaration process.

Process for assessing fitness and propriety of Approved Persons

The individuals are subject to the Group's Regulatory Compliance Risk policy which has its own specific minimum standard on Regulatory Accountabilities which contains requirements relating to the fitness and propriety of those persons who hold regulatory accountabilities. The minimum standard requires that individuals should notify their own line manager and the Deputy Chief Risk Officer (who holds the SMF16 Compliance Oversight regulatory accountability), if there is any matter that may impact directly or create a perception of impacting on their ongoing fitness and propriety. The Risk function will then notify the regulator if there is information that would be expected to be material to the assessment of their fitness and propriety.

As well as being subject to ongoing formal reviews of their performance in their role, the individuals are also subject to the Group's annual self-declaration assessment of fitness and propriety. To support effective operation of this requirement, the Group:

- ensures that all Senior Managers, Certification Functions and Key Function Holders have an up-to-date role profile which is signed by both the individual and their line manager;
- ensures that role profiles for all Senior Managers, Certification Functions and Key Function Holders correctly reflect the regulatory accountabilities they hold, and includes an up-to-date structure chart;
- ensures that all individuals who have been a Senior Manager, Certification Function or Key Function Holder for the Group for more than six months have submitted to the Risk function their return from the last annual declaration of fitness and propriety; and
- ensures the Senior Managers, Certification Functions and Key Function Holders have evidence on file to show that their training needs have been kept under review, in particular that the actions they have taken regarding training are recorded within their ongoing performance reviews and within development plans.

B.3 Risk management system, including the Own Risk and Solvency Assessment

Risks are managed on a Group-wide basis for the regulated insurance companies, UKI and CIC, and the Group as a whole, as risks faced by the Group, UKI and CIC are similar in nature and scope. References to Group also include the Group's regulated insurance companies, UKI and CIC.

The Board sets and monitors adherence to strategy, risk appetite and risk framework. The Group has established an on-going process for assessing the principal risks facing the Group and monitoring the effectiveness of the Group's risk management systems.

The Enterprise Risk Management Strategy and Framework document sets out, at a high level, the Group's approach to setting risk strategy and managing risks. It documents the high-level principles and practices to achieve appropriate risk management standards and demonstrates the inter-relationships between components of the Enterprise Risk Management Strategy and Framework.

The Enterprise Risk Management Strategy and Framework is designed to enable the Group to manage the business with the necessary understanding of its risks and controls, as well as having appropriate oversight in place to manage risks proactively. It is aligned to the Three Lines of Defence model and provides a comprehensive approach for managing all principal risks across the Group. A central component of the Enterprise Risk Management Strategy and Framework is the Policy Framework, which includes policies and minimum standards.

Policies address specific risk areas and are aligned to the Group's risk appetite and, where appropriate, are supported by underlying minimum standards which interpret policies into a set of risk and control requirements to be implemented across the Group. The Group has a review programme to ensure that the Enterprise Risk Management Strategy and Framework, policies and minimum standards remain fit for purpose.

Risk objective	Risk appetite statement
Overarching risk objective	The Group recognises that its long-term sustainability depends on having sufficient economic capital to meet its liabilities as they fall due, thus protecting its reputation and the integrity of its relationship with policyholders and other stakeholders. As part of this, the Group's appetite is for general insurance risk, focusing on personal lines retail and small and medium-sized enterprise insurance in the UK. The Group has appetite for non-insurance risks, as appropriate, to enable and assist it to undertake its primary activity of insurance.
Maintain capital adequacy	The Group seeks to hold own funds in the range of 140% to 180% of the internal model solvency capital requirement. UKI and CIC seek to hold own funds in excess of 128% of their solvency capital requirements.
Stable and efficient access to funding and liquidity	The Group aims to meet both planned and unexpected cash outflow requirements, including those requirements that arise following a 1-in-200 years insurance, market or credit risk event.
Maintain stakeholder confidence	The Group has no appetite for material risks resulting in reputational damage, regulatory or legal censure, poor customer outcomes, fines or prosecutions, and other types of non-budgeted operational risk losses associated with the Group's conduct and activities. The Group will maintain a robust and proportionate internal control environment.

Risk function

The Risk function is a second line of defence function, responsible for providing subject matter expert advice, challenge and objective opinions on risk matters to the Group. The function works with the Risk Management Committee, Board Risk Committee and Board to define the Enterprise Risk Management Framework and undertakes regular monitoring of key risk indicators and risk profiles, as well as providing assurance in certain areas agreed as part of its annual plan, to determine the level of compliance with relevant regulatory requirements. The Risk function provides an objective view to the Board, via the Board Risk Committee, on whether it considers that the Group is operating within or outside its risk appetite. The Risk function also undertakes validation of the Group's Internal Economic Capital Model.

Risk Management Process

The Risk Management Process enables the Group and its regulated insurance companies to manage risk in a structured and consistent way.

The potential impacts of all risks, events and management actions are rated using an Impact Classification Matrix which facilitates a consistent approach to the sizing and categorisation across the Group. All risks are mapped to the Group risk taxonomy to support effective risk management and reporting across the business.

The risk management process is summarised below:

- Identify – identification of current and emerging risks, including risks presented through the implementation of change, which could impact on the achievement of business strategic objectives. Identification should utilise expert judgement, historical data, external data, forward-looking analysis and models.
- Assess – assessment of risks on an inherent and residual basis in terms of potential severity of impact and likelihood of occurrence. Assessments may be reached using quantitative or qualitative measures.
- Manage – management of residual risk exposure within risk appetite through the implementation of mitigating actions. Under exceptional circumstances management may explicitly accept the risk exposure outside of appetite in line with the Group's defined Risk Acceptance process. Action plans are used throughout the Group to ensure residual risk exposure is maintained at or brought back within risk appetite, to address control weaknesses or manage remediation (where required) following an event.
- Monitor – monitoring of risk exposure using key risk indicators and to ensure management actions are being delivered. The approach and frequency of risk monitoring depends on the nature of the risk and management judgement.
- Report – regular reporting of an accurate, clear and timely assessment of the risk profile and progress with management actions. Escalation of notable changes to risk profile to relevant committees and forums. RAG statuses and Risk Outlook Indicators (set out in the Risk Management Process minimum standard) are used in risk-related reports across the Group.

Implementation and integration of risk management system into the organisational structure and decision-making processes

Clear risk governance helps the Group with its objective of ensuring that risk management arrangements are effective. The Group Board delegates authority for risk management to the Chief Executive Officer, who then further delegates to the members of the Executive Committee. The Chief Risk Officer, who chairs the Risk Management Committee, has accountability for providing risk oversight.

The Group's risk governance arrangements include Three Lines of Defence accountabilities and the risk management responsibilities of the Board, the Board Risk Committee and Risk Management Committee. The Group ensures comprehensive risk management through its Three Lines of Defence model which can be found on page 89 of the Group's Annual Report & Accounts 2021 at www.directlinegroup.co.uk/en/investors

Own Risk and Solvency Assessment

The Own Risk and Solvency Assessment ("**ORSA**") process incorporates several underlying key processes and tools within the Group's Enterprise Risk Management Strategy and Framework which are used to manage risk and capital. These underlying processes and tools are reviewed periodically throughout the year at various governance committees enabling frequent and localised decision making.

The ORSA is facilitated by the Risk function and supported by teams within Finance. This report is taken into consideration by the Executive Committee and presented to the Board for review and the conclusions taken into consideration in assessing the Group's risk and capital profile related to the strategic plan. The agreed outcomes and conclusions of the ORSA are approved by the Board.

The ORSA report is also a supervisory tool and, as such, is used to explain to the relevant supervisory body the current and forecast capital and solvency position of the Group throughout the strategic plan period.

Risk management system for the internal model

Governance of the Internal Economic Capital Model

The Head of Validation:

- is responsible for managing the independent validation of the Internal Economic Capital Model, including production of the validation scope, framework and annual validation report; and
- is responsible for ensuring that validation tests are sufficiently robust and well documented.

Validation process of the Internal Economic Capital Model

The Group's Model Validation minimum standard is reviewed and updated on an annual basis to reflect changes in emerging practice, Solvency II requirements and structural changes within the Group.

The Internal Model Validation team is part of the Risk Management function, and retain full responsibility for the delivery of independent model validation.

During 2022 the in-house Model Validation team completed its seventh annual cycle of validation, with delivery of the executive summary of the annual validation report to the Risk Management Committee in January and Board Risk Committee in February. The team has also focused on further embedding in-house model validation as a business as usual function, which has delivered benefits in terms of proactivity and flexibility.

The Model Validation team gave an overall validation opinion in the annual independent validation report on the version used for the year end 2021 SCR assessment, that nothing material had come to their attention during their testing as part of the validation process that led to them recommending to the Board Risk Committee on 10 February 2022 that the Internal Economic Capital Model and the surrounding processes were not a sound basis for the purposes of calculating regulatory capital under Solvency II for both UKI and Group.

The Model Validation minimum standard requires the Chief Risk Officer to present the scope of validation activities envisaged for the year, as well as the validation framework to the Risk Management Committee for noting and the Board Risk Committee for approval on an annual basis.

The Validation Plan is drafted in line with the Model Validation Framework, which stipulates that the Group will maintain an annual cycle of validation activity and reporting, comprising three key elements:

- an annual programme of core validation testing;
- a rolling programme of 'deep-dives' into specific validation areas to take a deeper look at whether the modelling is fit for purpose and covers regulatory requirements; and
- validation of model changes (including updates to address previous validation issues).

The Model Validation Framework document distinguishes between the key elements that will form part of the annual programme of core validation testing and deep dives. The deep dives are performed as part of a rolling programme which aims to cover all areas of the model over a three-year time period, but also considers bespoke investigations in response to a thematic review or a current area of interest.

B.4.1 Internal control system

The Board has established a management structure with defined lines of responsibility and clear delegation of authority. This control framework cascades through the business units and central functions, detailing clear responsibilities to ensure the Group's operations have appropriate controls. This includes controls relating to the financial reporting process.

The Board, with the assistance of the Board Risk Committee and the Audit Committee as appropriate, monitors the Group's internal control systems that have been in place throughout the year under review, and reviews their effectiveness. The monitoring and review covers all material controls, including financial, operational and compliance controls.

The Board was also supported in its review of the annual Internal Risk and Control Assessment. This process involves business units and central functions completing a self-assessment of its risks and key controls and an Executive Sponsor, responsible for the business area, attesting to the status of the effectiveness of the risk management and internal control systems. The Risk function reviews and challenges these findings and the Audit function provides an independent assessment of the overall effectiveness of the governance and risk and control framework of the Group. The Group then combines the overall findings into a Group-level assessment, which the Board Risk Committee approves.

The Group Audit function supports the Board by providing an independent and objective assurance of the adequacy and effectiveness of the Group's controls. It brings a systematic and disciplined approach to evaluating and improving the effectiveness of its risk management, control and governance frameworks and processes.

The Board acknowledges that any internal control system can manage, but not eliminate, the risk of not achieving business objectives. It can only provide reasonable, not absolute, assurance against material misstatement or financial loss.

On behalf of the Board, the Audit Committee regularly reviews the effectiveness of the Group's internal control systems. Its monitoring covers all material controls. Principally, it reviews and challenges reports from management, the Group Audit function and the External Auditor. This enables it to consider how to manage or mitigate risk in line with the Group's risk strategy.

Key procedures of the internal control system

The Group has established a number of tools to support effective implementation of the internal control system. These include:

- detailed policies and minimum standards which articulate the controls required to manage risks that the Group is exposed to;
- a review programme to ensure that policies and minimum standards remain fit for purpose;
- management of risks through risk assessment, action and event management; and
- provision of advice and guidance by minimum standard owners to the first line of defence in discharging their responsibilities.

Additionally, the Group has a number of processes that demonstrate the proactive use of the Enterprise Risk Management Framework. These include:

- regular, at least annual, review of the Risk Appetite Framework and statements;
- formal risk management reporting to the Risk Management Committee and Board Risk Committee as well as regular risk reporting from other risk committees and forums;
- the Risk Management Process;
- committees and forums;
- the Material Risk Assessment;
- the Assessment of Risk Behaviours and Attitudes;
- the Own Risk and Solvency Assessment;
- adherence to the Group's risk policies and minimum standards;
- use of the Internal Economic Capital Model to inform and support decision-making;
- stress testing and scenario analysis; and
- the Internal Risk & Control Assessment process.

B.4.2 Compliance function

The Compliance function is a second line of defence function, which is responsible for providing advice and guidance to the Group regarding compliance with both conduct and prudential regulatory requirements. The Deputy Chief Risk Officer, who is approved as a Senior Manager is responsible for the Compliance function. The Compliance function works with colleagues from across the Risk function and management throughout the business to fulfil this responsibility.

The Regulatory Compliance Risk policy, Conduct policy, Fraud and Financial Crime policy and associated minimum standards outline the role of the function. These policies, approved by the Board, provide the high-level requirements to ensure that the Group remains compliant with supporting minimum standards. Other areas of compliance risk are covered by a number of separate policies and minimum standards on specific topics, such as information security and prudential issues. All employees are required to undertake annual online training of relevant subject areas.

In addition to the policies and minimum standards, the Compliance team undertakes the following with the objective of ensuring compliance with regulatory requirements:

- attendance at and/or chairmanship of governance forums; for example, the Financial Crime Steering Committee, Conduct Regulatory Risk Forum, Operational Risk Committee, Customer Conduct Committee, Risk Management Committee and Board Risk Committee;
- monitor regulatory developments and report areas of interest to management and the Boards;
- monitor adherence to risk appetite through the tracking of key risk indicators;
- manage incidents as they arise;
- provide advice and guidance;
- provide training;
- contribute to Internal Risk and Control Assessment;
- provide assurance and effectiveness reviews undertaken by the Compliance and Conduct Assurance team; and
- support regulatory reviews, including thematic reviews.

B.5 Internal audit function

The Group Audit function supports the Board and Executive Management ("**the Executive**") in their aim to: (i) achieve their strategic and operational objectives; (ii) protect the assets, reputation and sustainability of the Group; and (iii) discharge their corporate governance responsibilities.

This is achieved by:

- providing assurance that the risk management processes and controls established by management are adequate, effective and sustainable to manage key business risks, including reviewing any lessons learned analysis if a significant event has occurred;
- assessing whether all significant risks are identified by management and the Risk function and reported to the Board and the Executive;
- challenging the Executive to improve governance, risk management and control activities, including challenging the definition and monitoring of risk appetite performed by the Risk function;
- challenging processes and controls that support strategic and operational decision making and assessing the appropriateness and reliability of management information presented to the Board and the Executive;
- providing a Group-wide view of specific risk and control themes emerging from Group Audit work, including considering current and emerging factors and how business processes support a customer focus and compliance with conduct requirements;
- in conjunction with the Risk function, offering an assessment of management's risk behaviours and attitudes;
- when considered appropriate or on request – providing assurance over key corporate events, such as new products and services, outsourcing, acquisitions or divestment; and
- being available to the Board, as required, to provide an independent investigations service, for example in those circumstances where it would be inappropriate for the Risk function to undertake an investigation.

Group Audit presents a quarterly report to the Audit Committee summarising the results and analysis of audit activity in the preceding quarter. On an annual basis, Group Audit presents a report which provides (i) an independent opinion on the Group's self-assessment of the Group-wide control environment; (ii) an analysis of key themes and trends identified from audit work performed in the period; (iii) an assessment of the Enterprise Risk Management Framework; and (iv) an assessment of management's risk behaviours and attitudes. Group Audit are not part of the system of risk control or compliance. Group Audit do not:

- take accountability for the Risk Management Framework and processes;
- represent the Executive's assurance on risks; or
- take decisions on risk mitigation or implement risk mitigation actions on behalf of the Executive Committee.

Independence and objectivity of internal audit

To both preserve and reinforce the independence and objectivity of Group Audit, the primary reporting line for the Group Head of Audit is to the Chair of the Audit Committee who is an independent non-executive director. The Audit Committee is responsible for the appointment and removal of the Group Head of Audit. The Chair of the Audit Committee sets objectives for the Group Head of Audit and recommends remuneration for the Group Head of Audit to the Remuneration Committee. The Group Head of Audit communicates and interacts directly with the Audit Committee and with members of the Audit Committee in between Audit Committee meetings or where escalation is required.

The Group Head of Audit also maintains a reporting line to the Group Chief Executive Officer, to report on the outcome of audit activity and assessments on the Group control environment.

The independence and objectivity of Group Audit is maintained through being exempt from undertaking any executive or operational duties, or any other activity, that may impair the judgement of Group Audit. Group Audit remains free from interference by any element in the Group, including matters of audit selection, scope, procedures, frequency, timing or report content to permit maintenance of independence and objectivity. Group Audit has processes in place to manage conflicts of interest and, where used, co-source providers are subject to the same independence requirements as Group Audit. The Group Head of Audit confirms to the Audit Committee, at least annually, the organisational independence of Group Audit.

Rights and authorities

Group Audit's scope is unrestricted and covers all activities undertaken by, and on behalf of, the Group and its subsidiary companies. Group Audit has the right of access to:

- Group Non-Executive Directors and the Executive, including those of all subsidiary companies;
- the Audit Committee, Board Risk Committee, Executive Committee, and any other relevant committee, either through attendance or receipt of papers and minutes in relation to meetings; and
- all operations of the Group and any subsidiary companies, third parties and joint ventures, including all information, people and properties.

Group Audit also has the right to be informed promptly of a major potential or actual risk management or control failure and any major acquisition, re-organisation or disposal that may have a material impact on the risk management and control environment.

B.6 Actuarial function

The Actuarial function for the Group encompasses both first and second lines of defence activities and has been split between two Actuarial function holders.

Reserving and calculation of technical provisions is co-ordinated and performed by the first line of defence Actuarial function. Actuarial risk management, including opinions on underwriting and reinsurance is conducted by the second line of defence. The Actuarial Director and the Director of Financial Risk are the two chief actuaries for the Group and fulfil the first and second lines of defence responsibilities respectively.

The first line of defence Actuarial function meets the requirements of Solvency II with the following activities undertaken during the reporting period:

- co-ordinating the calculation of technical provisions;
- ensuring the appropriateness of methodologies used in the calculation of technical provisions;
- assessing the sufficiency and quality of data used in the calculation of technical provisions;
- comparing best estimates against experience; and
- informing Group management of the reliability and adequacy of technical provisions.

The second line of defence Financial Risk function meets the requirements of Solvency II with the following activities undertaken:

- expressing an opinion on the overall underwriting policy;
- expressing an opinion on the adequacy of reinsurance arrangements; and
- contributing to the effective implementation of the risk management system, in particular with respect to the risk modelling underlying the calculation of the capital requirements, and to the Own Risk and Solvency Assessment.

The contribution to the effective implementation of the risk management system is additionally met by the first line of defence Actuarial function through the supply of technical provisions to the Internal Economic Capital Model and the balance sheet.

Both the first and second line of defence functions are sufficiently composed of qualified actuaries to meet the skilled persons' requirement of actuarial functions. The activities of the Actuarial function are documented in the Actuarial Function report and submitted annually to the Board.

B.7 Outsourcing

The Supplier Management and Outsourcing minimum standard ensures the Group undertakes a consistent approach to the management of risks from the sourcing and appointment of external suppliers of goods and services in line with the risk appetite set by the Board. The policy provides a framework within which the Group manages its outsourcing and external supplier risk exposure where external supplier risk is defined as the risk of failing to implement a robust framework for the sourcing, appointment and ongoing contract management of external suppliers, outsourced service providers and intragroup relationships.

This framework details the defined sourcing approach when procuring the services and providing regular oversight of the performance of third parties in relation to key contractual requirements. This is particularly with respect to external suppliers that are deemed to provide a material, critical and important service to the Group and therefore, ultimately, to its customers. These are services of such importance that weaknesses or failure of those services would cast doubt upon the Group’s ability to comply with its key regulatory obligations or deliver its services to policyholders and as such processes and activities undertaken within sourcing and contract management have been refined to include requirements specific to these outsourced services.

The first line of defence identifies, assesses, manages and monitors all types of outsourcing and external supplier risks in line with the Enterprise Risk Management Strategy and Framework. Where additional guidance is required in respect of outsourcing and external supplier risk, the Procurement & Supply Chain function is consulted. The Group categorises relationships with external suppliers as follows:

- outsourcing arrangements are those of any kind between the Group and a service provider by which that service provider performs a service or an activity that would otherwise be undertaken by the Group;
- material, critical or important outsourcing arrangements are the outsourcing of a function or activity that is so important that the Group would be unable to deliver its services to policyholders without that function or activity. In the UK, all relevant arrangements must be notified to the appropriate regulator, through the second line of defence Compliance function, in advance of such activity taking effect;
- intragroup outsourcing is the provision of services which are material, critical or important by one entity to another within the same Group; and
- external suppliers are third-party organisations providing goods or services to the Group or directly to the Group’s customers on the Group’s behalf but exclude commission payments to brokers.

Where intragroup arrangements are in-force, the Supplier Management and Outsourcing minimum standard owner is to convene a review on an annual basis to ensure that the agreements remain current and reflect the appropriate service provisions and providers. This review, as a minimum, will include representation from the Group Legal, Procurement, Risk and Compliance functions. The review aims to help ensure that intragroup arrangements are all correctly identified and supported by an appropriate agreement, and any changes required given the Group’s corporate structure and the activities being undertaken are identified. Agreements are filed with the Company Secretariat function.

The intragroup agreements that currently exist are between DL Insurance Services Limited ("**DLIS**") and UKI, DLIS and CIC, and DLIS and U K Insurance Business Solutions Limited. These have been classified as material intragroup outsource agreements due to the Key Functions and services that are provided by DLIS to the regulated entities. Key Functions and services provided by DLIS include administration, operational support, and managerial advisory services; these are primarily provided from within the UK.

The Group outsources several critical or important activities to various third parties. The Group maintains, manages and provides oversight of these activities in line with the Supplier Management and Outsourcing minimum standard. These activities are provided from third parties within the UK, with the exception of a wide range of back office services across claims, customer operations, commercial and finance that are provided from third parties in India and South Africa.

B.8 Any other information

There is no other information.

Section C: Risk profile (UNAUDITED)

In this section:

C. RISK PROFILE

The risk management process outlined in B.3 aims to enable the Group to manage risk in a structured and consistent way and ensure continued effectiveness of the Group's risk mitigation techniques.

Risks are managed on a Group-wide basis for the regulated insurance companies, UKI and CIC and the Group as a whole, as risks faced by the Group, UKI and CIC are similar in nature and scope. References to Group also include the Group regulated insurance companies, UKI and CIC. The Group’s risk profile has remained broadly unchanged over the year.

Prudent person principle and management of invested assets

The prudent person principle defined in Article 132 of the Solvency II Directive includes provisions on how undertakings should invest their assets and is as much a behavioural standard as an assessment of judgements and investment decisions.

Prudence is evidenced in the manner through which investment strategies are developed (with reference to the Group’s liabilities and capital), implemented and monitored and the guidance provided by the Investment Committee and Board.

The Investment Management and Treasury function is responsible for ensuring that the Group only invests in assets and instruments where the risks can be properly identified, assessed, managed, monitored, controlled and reported in accordance with the Group’s Enterprise Risk Management Strategy and Framework and, in particular, the Investment Risk policy. All assets are invested taking into consideration the aggregate security, liquidity, quality and profitability parameters for the investment portfolio.

Assets are invested in an appropriate manner with the objective of ensuring their nature and duration match technical provisions to mitigate a loss which could arise from the imperfect matching of the timing and size of the cash flows from the investments and those linked to liabilities. The Investment Management minimum standard requires the Investment Management and Treasury function to perform an asset and liability matching exercise at least annually for each material regulated entity and recommend any changes to asset classes, strategic asset benchmarks or the use of derivatives to improve, inter alia, the matching of cash flows.

The framework ensuring assets are invested in a prudent manner and subject to effective ongoing monitoring is characterised by the following points:

- limiting investment in assets not admitted to trading on a regulated financial market;
- ensuring investment benchmarks for cash, gilts and other high-quality liquid assets are calibrated to be consistent with the Group’s analysis of liquidity requirements in stressed scenarios;
- diversifying exposure using benchmarks and limits to avoid excessive reliance on any particular asset class, issuer, group of companies, industry or geographic area;
- ensuring detailed credit assessments are undertaken prior to investing in any asset or transaction and such assessments are updated at suitable intervals;
- measuring and monitoring risk exposure across the entire portfolio on a daily basis;
- reviewing the performance of all asset classes against market conditions and investment guidelines set;
- providing senior management and the Risk function with comprehensive monthly management information reporting; and
- ensuring no uncovered or speculative use of derivatives occurs.

C.1 Underwriting risk

Underwriting risk

This is the risk that future claims experience on business written is materially different from the results expected, resulting in current-year losses. The Group predominantly underwrites personal lines insurance including motor, residential property, roadside assistance, creditor, travel and pet business. The Group also underwrites commercial risks primarily for low-to-medium risk trades within the small to medium-sized enterprises market. Contracts are typically issued on an annual basis which means that the Group’s liability usually extends for a 12-month period, after which the Group is entitled to decline to renew or can revise renewal terms by amending the premium or other policy terms and conditions such as the excess as appropriate.

The Solvency II definition of underwriting risk includes catastrophe risk, and the risk of loss, or the adverse change in value of the insurance liabilities resulting from significant uncertainty of pricing, underwriting and provisioning assumptions related to extreme or exceptional circumstances.

Pricing risk

Pricing risk is the risk of economic loss arising from business being incorrectly priced or inappropriately underwritten. Key risk drivers include:

- poor or insufficient data or data quality or inappropriate assumptions built in to pricing models;
- errors within or inappropriate use of pricing models; and
- regulatory changes, such as pricing practices which may place new restrictions on pricing.

Underwriting risk

Underwriting risk is the risk that future claims experience on business written is materially different from expected, resulting in current year losses. Key risk drivers include:

- catastrophe and weather related claims which may arise giving rise to material current year losses;
- claims inflation may be higher; and
- claims frequency may be higher than expected.

Distribution risk

Distribution risk is the risk of a material reduction in profit compared to plan due to the Group not writing its planned policy volumes in each segment. Key risk drivers include:

- changes in the underwriting cycle may restrict the Group's ability to write planned volumes of profitable business; and
- new regulation such as Pricing Practices has the potential to disrupt the market as firms adapt their approaches to achieve compliance.

Reserve risk

Reserve risk relates to both premium and claims. This is the risk of understatement or overstatement of reserves arising from:

- the uncertain nature of claims, in particular large bodily injury claims;
- unexpected future impact of socioeconomic trends or regulatory changes, for example future changes to the Ogden discount rate;
- data issues and changes to the claims reporting process;
- operational failures;
- failure to recognise claims trends in the market; and
- changes in underwriting and business written so that past trends are not necessarily a predictor of the future.

Understatement of reserves may result in not being able to pay claims when they fall due. Alternatively, overstatement of reserves can lead to a surplus of funds being retained resulting in opportunity cost, for example lost investment return or insufficient resource to pursue strategic projects and develop the business.

Risk concentrations

The Group is subject to concentration risk in a variety of forms, including:

- geographic concentration risk – the Group's business is written in the UK general insurance market. The Group purchases a catastrophe reinsurance programme to protect against a modelled 1-in-200 year windstorm/storm surge loss. The programme renews annually on 1 July and has a retention of £150 million and an upper limit of £1,150 million;
- product concentration risk – the Group offers a diversified portfolio of products and a variety of brands sold through a range of distribution channels to its customers;
- sector concentration risk – the concentration of the Group to any given industry sector is monitored and analysed in respect of commercial customers to ensure this risk is mitigated; and
- reinsurance concentration risk – the Group contracts with a diverse range of reinsurers to mitigate the credit and/or non-payment risks associated with its reinsurance exposures.

It is important to note that none of these risk categories is independent of the others and that giving due consideration to the relationship between these risks is an important aspect of the effective management of insurance risk.

Management and mitigation

Reinsurance is the main risk mitigation technique purchased in order to reduce the Group's exposure to the main underwriting risks and reserve risks.: catastrophe weather event claims and large individual Motor liability claims.

Underwriting, pricing, distribution and risk is managed through a range of processes and controls:

- underwriting guidelines are set for all transacted business and pricing refined by analysing comprehensive data;
- a range of key performance Indicators tracking underwriting performance are regularly monitored and reported to senior management;
- governance on model change provided by various committees and the internal audits conducted by underwriting; and
- the Group invests in enhanced external data to analyse and mitigate exposures.

Reserve risk is managed through a range of processes and controls:

- regular reviews of the claims and premiums, along with an assessment of the requirement for a liability adequacy provision for the main classes of business by the internal actuarial team;
- the use of external actuaries to review periodically the actuarial best estimate reserves produced internally, either through peer review or through provision of independent reserve estimates;
- accompanying all reserve reviews with actuarial assessment of the uncertainties through a variety of techniques including bootstrapping and scenario analysis;
- oversight of the reserving process by relevant senior management and the Board;
- regular reconciliation of the data used in the actuarial reviews against general ledger data and reconciliation of the claims data history against the equivalent data from prior reviews; and
- regular assessment of the uncertainty in the reserves to help the Board set management best estimate reserves.

Risk sensitivity methods, assumptions, stress testing and sensitivity analysis

Multiple major weather events

Catastrophe events are a material driver of underwriting risk for the Group with reinsurance as an important mitigation.

Ogden discount rate and periodic payment orders

The Group's reserves are subject to the risk of retrospective changes in judicial conditions such as the change in the Ogden discount rate to minus 0.25% in England and Wales which took effect from 5 August 2019 under the Civil Liability Act 2018. This rate is set by the Lord Chancellor and used by courts to calculate lump sum awards in bodily injury cases. The rate had been 2.5% since 2001 but was changed to minus 0.75% from 20 March 2017. In September 2019, the Scottish Parliament announced that the Ogden discount rate in Scotland would remain at minus 0.75% under the Damages (Investment Returns and Periodical Payments) (Scotland) Act.

Further reserve revaluation may be required in future, as under the new review processes the Ogden discount rate will be reviewed again at the latest in 2024.

Uncertainty in claims reserves estimation is larger for claims such as periodic payment orders for which annually indexed payments are made typically over the lifetime of the injured party. Claims reserves for periodic payment orders are held on a discounted basis and are sensitive to a change in the discount rate.

Claims inflation

The UK economic outlook remains uncertain and there is a risk of higher than expected claims inflation in 2022. Much depends on the evolution of the pandemic and measures taken to protect public health, as well as the transition to the new trading arrangements between the EU and the UK. In addition to concerns about general indicators of economic health, such as falls in gross domestic product ("**GDP**"), rising unemployment and rising public sector debt ratios, the Group's reserves are exposed to the risk of changes in claims development patterns and claims inflation resulting from the pandemic. Changes in claims frequency present greater uncertainty for the unearned part of the business, whereas uncertainty over the level of claims severity has a greater impact on the earned claims reserves. Claims severity risk is particularly acute with respect to care costs for large bodily injury claims and repair costs due to potential supply chain interruptions. Unanticipated inflation may also impact other claims costs, for example an increase in fraud and theft.

The invasion of Ukraine is not expected to cause a direct impact to the Group; however, there could be secondary effects. Several car manufacturers that build vehicles in Russia have announced they are pausing production. This may lead to further inflation in used car prices, leading to Motor claims inflation. There may be supply chain issues with certain input materials to car manufacturing which are produced/exported by Russia or Ukraine leading to issues with availability of certain parts, thus challenging the repair process and cost. Furthermore, rising oil/gas and food prices may lead to higher claims inflation, both directly, for example increased shipping costs affecting the cost of materials, goods and car parts, and indirectly through upwards pressure on wage inflation. General inflation may also lead to more shopping around and downwards pressure on market insurance premiums. The incremental impact of these given other inflationary pressures is expected at this point of time to be medium to low. We continue to monitor.

Climate change

There is a risk that climate change affects the frequency and severity of extreme weather events (physical risk), which will change the Group's view of underwriting risk, reinsurance and pricing. The Group will continue to develop its risk management systems and monitoring tools over 2022 for physical risk building on the work undertaken to complete the Climate Biennial Exploratory Scenario ("**CBES**") in 2021. Low-frequency, high-severity weather losses are mitigated to a significant degree by the catastrophe reinsurance programme, the ceding of home high flood risks to Flood Re, and the commercial underwriting strategy which reduces high flood risk exposure. Furthermore, there is a risk that the Group's insurance products will not meet its customers' needs as a result of changes in market dynamics and customer behaviour in relation to climate change, for example a rapid shift towards electric vehicle usage.

The Group has committed to a climate change framework from which to assess, monitor and take the necessary actions to mitigate this risk where appropriate.

The Group expects these specific risks to materialise in the medium to longer-term and anticipates that its continued strategic and operational response to the transition to a lower-carbon economy will support mitigation of these risks and the associated impacts in the long term. An additional response is the commitment to set Science-Based Targets during 2022.

Solvency ratio sensitivity analysis

The following table shows the Group's solvency ratio sensitivities to four insurance risk events, estimated based on an assessed impact of scenarios as at 31 December 2021.

The sensitivities have been applied to the Group solvency capital ratio after the inclusion of capital distributions announced in March 2022. Other potential risks beyond the ones described could have an additional financial impact on the Group.

	Impact on solvency capital ratio	
Scenario	**31 Dec 2021**	31 Dec 2020
Deterioration of small bodily injury motor claims equivalent to experienced in 2008/09	**(5pts)**	(6pts)
One-off catastrophe loss equivalent to the 1990 storm "Daria"	**(9pts)**	(8pts)
One-off catastrophe loss based on extensive flooding of the River Thames	**(9pts)**	(8pts)
Increase in Solvency II inflation assumption for PPOs by 100 basis points[1]	**(9pts)**	(10pts)

Note:

1. The periodic payment order inflation assumption is an actuarial judgement which is reviewed annually based on a range of factors including the economic outlook for wage inflation relative to the PRA discount rate curve.

C.2 Market risk

This is the risk of loss resulting from fluctuations in the level and in the volatility of market prices of assets, liabilities and financial instruments.

The Group is mainly exposed to the following market risk factors:

- spread risk;
- interest rate risk;
- property risk; and
- currency risk.

Spread risk
This is the risk of loss from the sensitivity of the value of assets and investments to changes in the level or in the volatility of credit spreads over the risk-free interest rate term structure. The level of spread is the difference between the risk-free rate and actual rate paid on the asset, with larger spreads being associated with higher risk assets. The Group is exposed to spread risk through its asset portfolio, most notably through its investment in corporate bonds. This spread risk may change owing to external factors such as the Russia-Ukraine conflict.

Net interest rate risk
This is the risk of loss from changes in the term structure of interest rates or rate volatility which impact assets and liabilities. The Group's interest rate risk arises mainly from its debt, floating interest rate investments and assets and liabilities exposed to fixed interest rates.

The Group has subordinated guaranteed dated notes with fixed coupon rates which were issued on 27 April 2012 at a fixed rate of 9.25% and have a redemption date of 27 April 2042; at the time of issue the Group entered into a 10-year interest rate swap, to exchange the fixed rate of interest on these notes to a floating rate, to hedge exposure to interest rate risk. This was treated as a designated hedging instrument.

Of the £500 million notes issued, the Group has bought back a total nominal value of £250 million.

The hedging relationship between the subordinated debt and the interest rate swap was re-designated to reflect this transaction and ensure continuing hedge effectiveness. However, on 31 July 2020, the Group identified that the hedge no longer met the criteria of hedge effectiveness under IAS 39 'Financial Instruments: Recognition and Measurement' and, under the rules of the standard, the accumulated hedging adjustment is being amortised to the IFRS income statement from the date of the last successful hedge effectiveness test over the remaining life of the subordinated debt using an effective interest rate calculation.

The Group also has subordinated Tier 2 notes with fixed coupon rates with a nominal value of £260 million that were issued on 5 June 2020 and perpetual Tier 1 notes with fixed coupon rates with a nominal value of £350 million that were issued on 7 December 2017.

The Group also invests in floating rate debt securities, whose investment income is influenced by the movement of the short-term interest rate. A movement of the short-term interest rate will affect the expected return on these investments.

The market value of the Group's financial investments with fixed coupons is affected by the movement of interest rates. For the majority of investments in US dollar and Euro corporate bonds, the Group hedges its exposure to US dollar and Euro interest rate risk using swaps, excluding £348.6 million of US dollar short duration high yield bonds (2020: £361.8 million), £123.9 million of US dollar subordinated financial debt and £96.2 million of Euro subordinated financial debt (2020: £99.9 million US dollar and £71.4 million respectively) and £nil million short duration Euro credit (2020 £58.7 million).

Property risk
This is the risk of loss arising from sensitivity of assets and financial investments to the level or volatility of market prices, rental yields, or occupancy rates of properties. At 31 December 2021, the value of property investments was £317.0 million (2020: £292.1 million). The property investments are located in the UK.

Currency risk
This is the risk of loss from changes in the level or volatility of currency exchange rates.

Exposure to currency risk is generated by the Group's investments in US dollar and Euro denominated bonds.

The Group maintains exposure to US dollar securities through £1,376.5 million (2020: £1,331.9 million) of investments in US dollar bonds and Euro securities through £197.7 million (2020: £231.1 million) of Euro bonds. The foreign currency exposure of these investments is hedged by foreign currency forward contracts, maintaining a minimal unhedged currency exposure on these portfolios, as well as a low basis risk on the hedging contracts.

A limited exposure to currency risk also arises through the Group's insurance and other contractual liabilities.

Risk concentrations

Concentration risk arises from inadequately diversified portfolios of assets, in particular:

- large exposures to individual groups;
- large exposures to certain industry sectors;
- large exposures to certain geographies – the Group holds property assets solely within the UK;
- large exposures to exchange rate fluctuations – the Group holds a significant proportion of its assets in US dollar; and
- large exposures to different groups where movements in values and ratings are closely correlated for any other reason.

The Group manages and controls the concentration risks as part of its market risk mitigation techniques, which are described below.

Management and mitigation

The Group manages and controls the risks in its investment portfolio through:

- strategic asset allocation within the investment portfolio is reviewed by the Investment Committee which makes recommendations to the Board for its investment strategy approval;
- diversification of the types of assets, and tight control of individual credit exposures; and
- risk-reduction techniques, such as hedging foreign currency exposures with forward contracts and hedging exposure to US interest rates with swap contracts.

The Group's Investment Risk policy and related minimum standards require the First Line of Defence, in this case the Investment Management and Treasury function, to undertake an asset-liability management study at least annually. The study must consider the following:

- mitigation of interest rate risk, typically using key rate duration analysis;
- the implications and rationale for mismatches pursued when backing liabilities on the balance sheet, for example 'real growth' asset strategy supporting inflation linked periodic payment orders;
- suitability and appropriateness of Group asset classes given the risk appetite of the Group and capital position; and
- overall expected returns from the investment portfolio given regulatory capital employed.

The quality of assets held in each segregated portfolio is controlled through investment mandates detailing acceptable credit ratings, issuer concentration limits and prohibited holdings.

The operating framework used by the Investment Management and Treasury function, evidenced through the written internal procedures framework and contractual and service level requirements in place with external service providers employed, is designed to ensure:

- assets owned are held securely, with holdings verifiable independently by the Group;
- encumbered assets, for example those allocated as collateral, can be identified easily;
- actual returns received can be measured versus benchmark criteria set and budgeted return assumptions; and
- aggregate and individual asset holdings can be monitored against the key risk controls set; for example, strategic benchmark weightings, credit ratings, issuer exposure limits and credit duration limits.

Risk sensitivity methods, assumptions, and stress testing and sensitivity analysis

The Finance function is responsible for monitoring the regulatory capital requirement to support the investment strategy. To support this, they perform stress tests on the capital, and identify management actions should such stresses occur. Additional stress testing and scenario analysis is carried out by the Risk function. Value at risk is calculated by the Capital Modelling team within the Finance function on a quarterly basis to monitor changes in market conditions on likely capital requirements. Losses may arise from:

- the sensitivity of the value of assets to changes in the level or in the volatility of credit spreads over the risk-free interest rate term structure;
- assets and liabilities for which the net asset value is sensitive to changes in the term structure of interest rates or interest rate volatility;
- the imperfect matching of the timing and size of the cash flows from the investments and those linked to the liabilities; and
- the sensitivity of assets to the level or volatility of market prices of property.

The following table shows the Group's solvency capital ratio sensitivities to two market changes, estimated based on an assessed impact of scenarios as at 31 December 2021.

	Impact on solvency capital ratio[1]	
Scenario	**31 Dec 2021**	31 Dec 2020
100bps increase in credit spreads[2]	**(8pts)**	(9pts)
100bps decrease in interest rates with no change in the PPO real discount rate	**(2pts)**	(2pts)

Note:

1. 2021 figures exclude from own funds the value of the £250 million Tier 2 subordinated debt which can first be called from 27 April 2022. The comparative period has been represented on this basis, with the only change being the interest rate sensitivity which was reported as (3pts) at 31 December 2020.
2. Only includes the impact on AFS assets (excludes illiquid assets such as infrastructure debt) and assumes no change to the SCR.

C.3 Credit risk

This is the risk of loss resulting from defaults in obligations due from and/or changes in credit standing of either issuers of securities, counterparties or any debtors to which the Group is exposed. The Group is mainly exposed to counterparty default risk.

Counterparty default risk

This is the risk of loss from unexpected default or deterioration in the credit standing of the counterparties and debtors of Group undertakings. This risk is monitored by three forums – the Investment Risk Forum monitors credit spreads as indicators of potential losses on investments incurred but not yet realised; the Credit Risk Forum monitors reinsurance and corporate insurance counterparty default risk; and the NIG Credit Committee is responsible for monitoring broker credit risk. The main responsibility of these forums is to ensure that all material aspects of counterparty default risk within the Group are identified, monitored and measured.

The main sources of counterparty default risk for the Group are:

- investments: this arises from the investment of funds in a range of investment vehicles permitted by the Investment policy;
- reinsurance recoveries: this arises in respect of reinsurance claims against which a reinsurance bad debt provision is assessed. Periodic payment orders have the potential to increase the ultimate value of a claim and to increase significantly the length of time to reach final payment. This can increase reinsurance counterparty default risk in terms of both amount and longevity;
- commercial credit: this arises as brokers collect premiums on behalf of the Group; and
- consumer credit: exposure from offering monthly instalments on annual insurance contracts.

Risk concentrations

Concentration risk arises from inadequately diversified exposure to creditors, in particular:

- large exposures to individual assets (either bond issuers or reinsurers); and
- large exposures to different assets where movements in values and ratings are closely correlated.

Management and mitigation

- credit limits are set for all brokers and reinsurers and the Group actively monitors those credit exposures; and
- the Group only purchases reinsurance from reinsurers with at least an A– rating at the time cover is purchased.

Risk sensitivity methods, assumptions, and stress testing and sensitivity analysis

The Finance function monitors the regulatory capital requirement to support the business strategy employed. They perform stress tests and identify management actions should such stresses occur. One stress test considered the impact of the Group's largest reinsurer defaulting, which would lead to a financial loss of approximately £150 million if no recoveries could be made. However, as the default of the Group's largest reinsurer is considered to have a return period of beyond 1-in-200 years, this result will not materially impact the capital requirements of the Group.

C.4 Liquidity risk

Liquidity risk is the risk of being unable to access cash from the sale of investments or other assets in order to settle financial obligations when they fall due.

Liquidity risk is considered to be immaterial to the SCR for the Group, UKI and CIC. However, the Group is exposed to risk events that could impact liquidity such as a windstorm event.

Management and mitigation

The annual liquidity study assesses the Group's liquidity requirements and considers access to liquidity in stressed scenarios. The measurement and management of the Group's liquidity risk is undertaken within the limits and other policy parameters of the Group's liquidity risk appetite and is detailed in the Liquidity Risk minimum standard. As part of this process the Investment and Treasury team are required to put in place a liquidity plan which must consider expected and stressed scenarios for cash in-flows and out-flows that is reviewed at least annually by the Investment Committee. Compliance is monitored in respect of both the minimum standard and the regulatory requirements of the PRA.

At a more granular level, access to liquidity in stressed scenarios is met through holdings of cash, money market funds and other high-quality liquid assets such as sovereign debt securities. The aggregate exposure to illiquid assets is also monitored as part of the aggregate portfolio consideration.

Additional initiatives to support liquidity include sovereign debt security repurchase agreement lines in place. These will enable any short-term material cash requirements that arise which have not been forecast to be covered without unnecessary sales of sovereign debt securities and the associated realised gains or losses on the sale.

The Investment Management and Treasury function forms an integral component of the Group's annual strategic plan process and forecast updates during the year. Where assets under management are expected to rise or fall materially in the next two years, the Investment Management and Treasury function produces proposals for approval by the Investment Committee detailing how liquidity will be managed and maintained.

Risk sensitivity methods, assumptions, and stress testing and sensitivity analysis

The expected profit in future premiums ("**EPIFP"**) is calculated to assess the impact on own funds of a lapse in certain policies and provides a measure of the insurer's exposure to liquidity risk. It is not a measure of overall profitability of the business, for example it does not allow for all sources of income (e.g. ancillary or investment income); it is calculated on a different expense basis to that of ongoing operating expenses; it does not allow for the development of prior year claims provisions; and it is affected by seasonality of the business written over the year. The amount as at 31 December 2021 for Group and UKI was £140.4 million.

EPIFP figures are calculated, and included in this report, in accordance with the regulatory requirements of Solvency II. EPIFP is not a measure of any element of the profit for the Group and is not to be construed as a profit forecast for the Company or any part of the Group or interpreted to set a floor to the profits of the Company or any part of the Group. In addition, attention is drawn to the 'Forward-looking statements disclaimer' in section F.3 of this document, which applies, without limitation, to EPIFP.

The Liquidity Risk minimum standard requires the Investment Management and Treasury function to maintain short-term cash flow forecasts to ensure ongoing operational liquidity requirements are met. The function is also required to hold minimum levels of liquidity to meet stressed requirements on an overnight basis, within one month and within three months.

C.5 Operational risk

Operational risk is the risk of loss due to inadequate or failed internal processes, systems, human error or from external events. It is the broadest of the risk categories, and the current risk assessment is driven by sources of operational risk including those associated with the criticality of Technology to the Group's operations, the cyber threat landscape, the Group's reliance on material outsource providers and critical suppliers, and the depth and breadth of internal change required to achieve strategic aims. In addition to this, as well as how the various risk sources overlap and require significant management focus to enable the Group to remain operationally resilient.

Technology remains at the heart of the Group operations and focus is on continuing to upgrade Group IT systems and capabilities, aimed at building resilience in by design, simplifying the Group's technology estate, expanding the Group's digital offerings, capitalising on the Group's data, enhancing customer experience and overall increasing operational efficiency. Progress has been made in each of these areas, but implementation and integration of a range of new IT systems is inherently complex and challenging.

Risk concentrations

The Group is subject to concentration in its operational risks through, for example, its IT systems and change agenda; including the risks arising from scenarios such as system outages, data security breaches, key resource constraints, and general operating inefficiencies. That said, the operational risk concentration and management over the business planning period has not significantly changed over the year.

Management and mitigation

The Group proactively manages its operational risks to mitigate potential customer harm, regulatory or legal censure, financial and reputational impacts. The Group has in place operational processes and systems, including prevention and detection measures. These include processes which seek to ensure the Group can absorb and/or adapt to internal or external events that could impact customer operations and the wider business, as well as to learn from these situations to improve the Group's overall risk and control systems moving forward.

The Group moved to a strategic homeworking model in 2021, with a mixed model now embedded that has combined remote working with using the Group's offices for collaboration, team building and training. As such, the Group is continuing to work on improving the performance of its IT systems in that environment, moving to suitably resilient technologies, while focusing on developing current/future system capability. With significant strategic investment the Group continues to drive forward its aim to deliver its digital-first customer experience and remains on track to further strengthen its change implementation controls and mitigate potential impacts related to data, technology, security and operational resilience.

The Group has also successfully delivered key activities in 2021 to demonstrate compliance with operational resilience requirements ahead of the regulatory deadline of 31 March 2022, including the development of its self-assessment document, which was approved by the Board in November 2021.

The Group's risk management framework is designed to enable it to capture risk information in a complete and consistent way, enabling proactive trend analysis, root cause analysis and read across to facilitate early warnings and a 'learning' risk environment.

The performance of outsourced activities is also actively monitored by the Group.

Risk sensitivity methods, assumptions, and stress testing and sensitivity analysis

The Group's operational risk quantification utilises a scenario-based approach to model each material risk and quantify the capital requirement at the 1-in-200 year level.

C.6 Other material risk

Regulatory and conduct risks
The Group maintains a constructive and open relationship with its regulators and has a strong culture of delivering on commitments to customers.

The issue of pricing practices within the general insurance market continues to be a key regulatory focus. The Group has implemented the requirements of the FCA's Pricing Practices Review to date.

The Group's conduct risk management framework is designed to deliver fair outcomes to customers and has continued to be developed in accordance with the FCA's increased expectations, particularly around pricing and product governance.

In December 2021, the FCA published its second consultation paper on a new 'Consumer Duty' which comprises a set of rules and outcomes that set clear expectations for firms' cultures and behaviours. The FCA envisages that the new Consumer Duty will require a step change in the way in which retail firms consider the needs of their customers. New rules are due to be published by 31 July 2022 and it is expected that firms will have to fully implement the requirements by 30 April 2023. The Group continues to develop its processes in anticipation of the final rules and to ensure that it continues to provide good outcomes to its customers.

In addition, the Group carries out planned risk-based monitoring of customer processes as well as more targeted thematic reviews which consider strategic or regulatory projects to help manage the risk of poor customer outcomes.

Reputational risks
Reputational risk is not considered a material risk in its own right within the Group; however, it is considered in assessing the exposure of other risk types such as compliance, change, financial reporting, partnership contractual obligations, outsourcing and conduct risks. In particular, were the Group to suffer a significant cyber breach, loss of service, or a reduction in solvency coverage, these could have significant reputational impacts which would need to be managed.

To manage reputational risks within appetite, the Group both seeks to address the primary risks, but also has mitigation plans in place to react to reputational risk directly as it develops (for example, through proactive stakeholder management and communication strategies).

Strategic risks
Risks associated with strategic implementation and formulation are considered within the Material Risk Register and monitored by the Executive Committee. Risks which may impact the Group's ability to achieve its strategic goals manifest across the Material Risk Register. The Group's approach to managing strategic risks within appetite is to address those primary risks. Strategic risk is not explicitly modelled in the Group's partial internal model SCR.

Potential effects of Covid-19 and the UK's new international trading relationships on inflation
The UK's new international trading relationships may have had an impact on claims inflation and may still do so, although the Covid-19 pandemic continues to mask the effects of these relationships. Certain risks related to Brexit could still occur or be exacerbated and the Group continues to be alert to possible developments.

C.7 Any other information

Invasion of Ukraine

The primary direct impact of the invasion of Ukraine on the Group relates to market volatility, in particular, the widening of credit spreads, and increases in interest rates and inflation. The Group's investment portfolios are relatively conservatively positioned and no defaults are expected as a result of this conflict. It is monitoring the portfolio on an ongoing basis and has carried out credible and severe stresses to be considered by the Board.

The medium-term impacts of the conflict are uncertain, however the Group notes that there are a number of variables which could worsen, potentially leading to a global conflict or a pervasive and long lasting situation. This presents a material risk to Western economies, and inflation in the price of commodities, wheat and manufacturing costs, at a time when affordability is a major concern across the globe, increases the risk of recession.

The Group's supply chain is currently expected to experience limited impact associated to a shortage of Russian or Ukrainian commodity exports, however it continues to monitor the situation closely.

While there is potential for great disruption across the world as a result of the invasion of Ukraine and the associated tensions between Russia and NATO/EU, the Group is well-positioned to withstand those impacts.

SECTION D: VALUATION FOR SOLVENCY PURPOSES

In this section:

D. VALUATION FOR SOLVENCY PURPOSES

Section D is subject to external audit, with the exception of the text and figures relating to risk margins (which are included within technical provisions). These are excluded from the scope of external audit as they are derived from the Group's partial internal model and UKI's internal model which are used to calculate the Group and UKI SCRs respectively; these SCRs are also unaudited.

D.1 Assets

Valuation methodology

The Group values all assets, excluding reinsurance receivables, goodwill and intangibles, at fair value in the Group, UKI and CIC Solvency II balance sheets, which represents an amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction. When fair value is not readily available because the market is not deeply liquid, an alternative method of valuation is required. Assets that require the use of an alternative method of valuation are covered in section D.4. Asset recognition and valuation bases have been applied consistently during the reporting period. The assumptions and judgements do not include any assumptions about the future or additional sources of estimation other than those noted. Reinsurance receivables are included in section D.2 Technical provisions.

Group accounting policy – fair value

The accounting policies and the basis of valuation used in the Group IFRS financial statements and individual IFRS financial statements of its subsidiaries are consistently applied, and described in the Group's Annual Report & Accounts 2021 within 'Notes to the consolidated financial statements', note 1 'Accounting policies', which starts on page 181.

Fair value is best demonstrated by reference to a quoted price in an active market. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. The appropriate quoted market price for an asset held is usually the current bid price. When current bid prices are unavailable, the price of the most recent transaction provides evidence of the current fair value as long as there has not been a significant change in economic circumstances since the time of the transaction. If conditions have changed since the time of the last transaction, the fair value is determined by reference to observable market data such as prices for similar assets, recent transactions in less active markets or the fair value reflects the change in condition by reference to, but not limited to, interest rates, foreign exchange rates, volatilities in debt prices or credit spreads for similar financial instruments.

If the market for a financial asset is not active, the Group establishes the fair value by using a valuation technique. Valuation techniques include using recent arm's length market transactions between knowledgeable and willing parties (if available), reference to the current fair value of another instrument that is substantially the same, discounted cash flow analysis and option pricing models. If there is a valuation technique commonly used by market participants to price the instrument and that technique has been demonstrated to provide reliable estimates of prices obtained in actual market transactions, the Group uses that technique.

Fair value for derivatives is determined from quoted prices in active markets where available. Where there is no active market for an instrument, fair value is derived from prices for the derivative's components using appropriate pricing or valuation models. Valuation models use inputs for contractual terms and the specific risks inherent in the instrument, market prices, credit curves, yield curves, measure of volatility and correlations of such inputs.

For investment property, fair value is based on current prices using a valuation model that predominantly uses unobservable inputs. Valuations are compared with recent market transactions for similar properties and adjusted for the specific characteristics of each property.

When valuing assets and liabilities in accordance with Solvency II, the fair value hierarchy set out below is followed, which is consistent with the fair value measurement hierarchy as applied under IFRS:

Level 1 financial assets are measured in whole or in part by reference to published quotes in an active market. In an active market quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency and those prices represent actual and regularly occurring market transactions on an arm's length basis.

Level 2 financial assets and liabilities are measured using a valuation technique based on assumptions that are supported by prices from observable current market transactions. These include AFS debt security assets for which pricing is obtained via pricing services, but where prices have not been determined in an active market, or financial assets with fair values based on broker quotes or assets that are valued using the Group's own models whereby the majority of assumptions are market-observable. Derivatives are valued using broker quotes or appropriate valuation models. Model inputs include a range of factors which are deemed to be observable, including current market and contractual prices for underlying instruments, period to maturity, correlations, yield curves and volatility of underlying instruments.

Level 3 fair value measurements used for investment properties, held-to-maturity debt securities, infrastructure debt, commercial real estate loans and equity investments are those derived from a valuation technique that includes inputs for the asset that are unobservable.

Key differences between the valuation of assets under Solvency II compared to IFRS

The Group applies a value of zero to goodwill for Solvency II and measures at cost less any provision for impairment in the IFRS financial statements. For intangible assets other than goodwill, a value of zero is assigned under Solvency II for the Group and UKI, because it is not possible to sell other intangible assets separately or demonstrate that there is a market value for the same or similar assets. In the IFRS financial statements these assets are carried at cost less accumulated amortisation and any provision for impairment.

Deferred acquisition costs in the Group and UKI financial statements are not recognised as an asset under Solvency II. Insurance and other receivables in the Group and UKI financial statements primarily consist of future cash flows due from policyholders which are not yet due and are reflected as an asset within Solvency II technical provisions. Cash flows from policyholders which are due or overdue are reflected as Solvency II receivables.

The table below and those on pages 43 and 44 summarise the Group's, UKI's and CIC's Solvency II balance sheet in column (d) and compares the assets and liabilities as reported in the respective IFRS financial statements in column (a). Reclassifications required to align the respective IFRS financial statements to the prescribed format of the Solvency II balance sheet QRT's are given in column (b).

Group Balance Sheet – IFRS and SII

As at December 2021 (£m)	Notes to the financial statements	IFRS (a)	Reclassifications (b)	IFRS reclassified (c) = (a) + (b)	SFCR note	Solvency II (d)	Valuation difference (e) = (d – c)
Assets							
Goodwill	17	215.0	—	215.0		**–**	(215.0)
Other intangible assets	17	607.5	—	607.5		**–**	(607.5)
Deferred acquisition costs	23	186.6	—	186.6		**–**	(186.6)
Deferred tax assets		—	—	—	D.1.1	**179.4**	179.4
Pension benefit surplus	27	12.1	—	12.1	D.1.2	**12.1**	—
Property plant & equipment held for own use	18,19	189.9	41.2	231.1	D.1.3	**178.3**	(52.8)
Property (other than own use)	20	317.0	—	317.0	D.1.4	**317.0**	—
Financial investments	28	**4,217.9**	**792.9**	**5,010.8**		**5,012.9**	**2.1**
Equities		6.2	—	6.2	D.1.5	**6.1**	(0.1)
Government bonds		49.6	—	49.6	D.1.6	**49.6**	—
Corporate bonds[1]		4,109.4	16.8	4,126.2	D.1.7	**4,128.4**	2.2
Collateralised securities[1]		16.8	(16.8)	—		**–**	—
Collective investments undertakings[2]		—	792.9	792.9	D.1.8	**792.9**	—
Derivatives	26	35.9	—	35.9	D.1.9	**35.9**	—
Loans and mortgages	28	451.6	—	451.6	D.1.10	**456.0**	4.4
Reinsurance recoverables[3]	22	1,211.8	(37.2)	1,174.6		**1,170.3**	(4.3)
Receivables		**864.0**	**(680.6)**	**183.4**		**183.3**	**(0.1)**
Insurance and intermediaries[4]		715.8	(676.4)	39.4	D.1.11	**39.4**	—
Reinsurance receivables[3]	24	41.0	(4.2)	36.8	D.1.11	**36.8**	—
Trade, not insurance		107.2	—	107.2	D.1.11	**107.1**	(0.1)
Cash and cash equivalents[2]	29	955.7	(792.9)	162.8	D.1.12	**162.8**	—
Assets held for sale[5]	30	41.2	(41.2)	—	D.1.13	—	—
Other assets		**38.3**	**41.5**	**79.8**		**75.6**	**(4.2)**
Own shares[6]		—	41.5	41.5		**37.5**	(4.0)
Other assets		38.3	—	38.3	D.1.14	**38.1**	(0.2)
Total assets		**9,308.6**	**(676.3)**	**8,632.3**		**7,747.7**	**(884.6)**
Liabilities							
Technical provisions[4]	35,36	5,181.2	(407.3)	4,773.9	D.2	**4,583.8**	(190.1)
Provisions other than technical provisions	38	96.4	—	96.4	D.3.1	**96.4**	—
Deferred tax liabilities	13	0.5	—	0.5	D.3.2	**–**	(0.5)
Derivatives	26	19.5	—	19.5	D.3.3	**19.5**	—
Debts owed to credit institutions	29	59.2	—	59.2	D.3.4	**59.2**	—
Financial liabilities other than debts owed to credit institutions	40	84.2	—	84.2	D.3.5	**84.2**	—
Insurance & intermediaries payables[4]		72.0	(68.9)	3.1	D.3.6	**3.1**	—
Reinsurance payables[3]	39	45.5	(41.4)	4.1	D.3.6	**4.1**	—
Payables (trade, not insurance)[4,7]		339.8	(195.2)	144.6		**144.6**	—
Subordinated liabilities[7]	34	513.6	(5.0)	508.6	D.3.7	**509.4**	0.8
Total liabilities		**6,411.9**	**(717.8)**	**5,694.1**		**5,504.3**	**(189.8)**
Excess of assets over liabilities		**2,896.7**	**41.5**	**2,938.2**		**2,243.4**	**(694.8)**

Notes for reclassifications in column (b):

1. Reclassification of £16.8 million to corporate bonds from collateralised securities at 31 December 2021.
2. Reclassification of £792.9 million from cash and cash equivalents to collective investments undertakings as at 31 December 2021.
3. Reclassification into reinsurance recoverables of £37.2 million from reinsurance payables of £(41.4) million and insurance receivables of £4.2 million as at 31 December 2021.
4. Reclassification of £676.4 million insurance and intermediaries receivables, £(68.9) million of insurance and intermediaries payables and £(200.2) million of payables (trade, not insurance) into technical provisions as at 31 December 2021.
5. Reclassification of assets held for sale of £41.2 million into property, plant & equipment held for own use.
6. Own shares held at 31 December 2021 of £41.5 million are held within equity on the IFRS balance sheet and have been reclassified from excess of assets over liabilities to own shares.
7. Reclassification of accrued interest of £5.0 million from subordinated liabilities to payables (trade, not insurance) as at 31 December 2021.

D. VALUATION FOR SOLVENCY PURPOSES continued

UKI Balance Sheet – IFRS and SII

As at December 2021 (£m)	Notes to the financial statements	IFRS (a)	Reclassifications (b)	IFRS reclassified (c) = (a) + (b)	SFCR note	Solvency II (d)	Valuation difference (e) = (d – c)
Assets							
Other intangible assets	10	2.4	—	2.4		**–**	(2.4)
Deferred acquisition costs	17	187.4	—	187.4		**–**	(187.4)
Deferred tax assets		1.0	—	1.0	D.1.1	**29.3**	28.3
Participations	13	11.5	—	11.5	D.15	**14.1**	2.6
Property plant & equipment held for own use	11	58.8	—	58.8	D.1.3	**58.8**	—
Property (other than own use)	12	317.0	—	317.0	D.1.4	**317.0**	—
Financial Investments	14	**4,166.4**	**569.7**	**4,736.1**		**4,738.3**	**2.2**
Government bonds		49.6	—	49.6	D.1.6	**49.6**	—
Corporate bonds[1]		4,064.1	16.8	4,080.9	D.1.7	**4,083.1**	2.2
Collateralised securities[1]		16.8	(16.8)	—		**–**	—
Collective investments undertakings[2]		—	569.7	569.7	D.1.8	**569.7**	—
Derivatives	14,15	35.9	—	35.9	D.1.9	**35.9**	—
Loans and mortgages	14	451.6	—	451.6	D.1.10	**456.0**	4.4
Reinsurance recoverables[3]	16,22	1,189.3	(37.2)	1,152.1		**1,144.9**	(7.2)
Receivables		**809.8**	**(680.6)**	**129.2**		**129.2**	**–**
Insurance and intermediaries[4]		715.8	(676.4)	39.4	D.1.11	**39.4**	—
Reinsurance receivables[3]		41.0	(4.2)	36.8	D.1.11	**36.8**	—
Trade, not insurance		53.0	—	53.0	D.1.11	**53.0**	—
Cash and cash equivalents[2]		723.2	(569.7)	153.5	D.1.12	**153.5**	—
Total assets		**7,918.4**	**(717.8)**	**7,200.6**		**7,041.1**	**(159.5)**
Liabilities							
Technical provisions[4]	21,22	5,154.2	(407.3)	4,746.9	D.2	**4,554.0**	(192.9)
Other provisions	23	50.0	—	50.0	D.3.1	**50.0**	—
Derivatives	15	19.2	—	19.2	D.3.3	**19.2**	—
Debts owed to credit institutions		51.6	—	51.6	D.3.4	**51.6**	—
Financial liabilities other than debts owed to credit institutions		153.0	—	153.0	D.3.5	**153.0**	—
Insurance & intermediaries payables[4]		71.0	(68.9)	2.1	D.3.6	**2.1**	—
Reinsurance payables[3]		45.5	(41.4)	4.1	D.3.6	**4.1**	—
Payables (trade, not insurance)[4,5]		222.0	(196.2)	25.8		**25.8**	—
Subordinated liabilities[5]	20	255.3	(4.0)	251.3	D.3.7	**251.8**	0.5
Total liabilities		**6,021.8**	**(717.8)**	**5,304.0**		**5,111.6**	**(192.4)**
Excess of assets over liabilities		**1,896.6**	**–**	**1,896.6**		**1,929.5**	**32.9**

Notes for reclassifications in column (b):

1. Reclassification of £16.8 million to corporate bonds from collateralised securities as at 31 December 2021.
2. Reclassification of £569.7 million from cash and cash equivalents to collective investments undertakings as at 31 December 2021.
3. Reclassification into reinsurance recoverables of £37.2 million from reinsurance payables of £(41.4) million and reinsurance receivables of £4.2 million as at 31 December 2021.
4. Reclassification of £676.4 million of insurance and intermediaries receivables, £(68.9) million of insurance and intermediaries payables and £(200.2) million of trade payables into technical provisions as at 31 December 2021.
5. Reclassification of accrued interest of £4.0 million from subordinated liabilities to payables (trade, not insurance) as at 31 December 2021.

D. VALUATION FOR SOLVENCY PURPOSES continued

CIC Balance Sheet – IFRS and SII

As at December 2021 (£m)	Notes to the financial statements	IFRS (a)	Reclassifications (b)	IFRS reclassified (c) = (a) + (b)	SFCR note	Solvency II (d)	Valuation difference (e) = (d – c)
Assets							
Collective investments undertakings[1]		—	18.7	18.7	D.1.8	**18.7**	—
Reinsurance recoverables	7	23.9	—	23.9		**27.3**	3.4
Reinsurance receivables		—	—	—		**—**	—
Cash and cash equivalents[1]		18.7	(18.7)	—	D1.12	**—**	—
Total assets		**42.6**	**—**	**42.6**		**46.0**	**3.4**
Liabilities							
Technical provisions	9	28.8	—	28.8	D.2	**31.7**	2.9
Deferred tax liabilities		—	—	—		**—**	—
Payables (trade, not insurance)		0.1	—	0.1		**0.2**	0.1
Total liabilities		**28.9**	**—**	**28.9**		**31.9**	**3.0**
Excess of assets over liabilities		**13.7**	**—**	**13.7**		**14.1**	**0.4**

Note for reclassifications in column (b):

1. Reclassification of £18.7 million from cash and cash equivalents to collective investments undertakings as at 31 December 2021.

D.1.1 Deferred tax assets

For Group, the Solvency II adjustments to the balance sheet result in the recognition of a deferred tax asset as a result of the write down of certain IFRS assets to their fair value under Solvency II rules. For UKI, the Solvency II adjustments to the balance sheet result in an increased deferred tax asset. Deferred tax assets are valued at fair value.

D.1.2 Retirement benefit obligation

The Group operated a small defined benefit pension scheme with a balance sheet asset value of £12.1 million as at 31 December 2021, which was closed in 2003. The scheme assets and liabilities are measured at fair value. More detail can be found in the Group's Annual Report & Accounts 2021 in note 27 'Retirement benefit obligations' which starts on page 221.

D.1.3 Property, plant and equipment held for own use

In the Solvency II balance sheets, owned property is valued at fair value, based on valuations provided by independent registered valuers using assumptions and methodology that are consistent with investment property. Property, plant and equipment is valued at fair value only if an external market exists and a price verified by an independent valuer can be obtained, which results in many smaller items being valued at zero. The IFRS financial statements value property, plant and equipment at historic cost less depreciation.

Leased assets, termed right-of-use assets ("**ROU**"), are included in the Solvency II balance sheet as part of Property, plant and equipment for own use. In both the IFRS and Solvency II balance sheet, ROU assets are valued at fair value. A ROU asset is initially valued at the present value of lease payments, plus initial direct costs less any incentives received using the incremental borrowing rate at the lease commencement date unless the interest rate implicit in the lease is readily available.

D.1.4 Investment property (other than for own use)

Property is stated at fair value in the Solvency II balance sheets and IFRS financial statements based on valuations by independent registered valuers, using consistent assumptions and methodology (see also D.4). Properties classified as assets held for sale in the IFRS financial statements are valued on the same basis for Solvency II and included within properties (other than for own use) in the Group balance sheet.

D.1.5 Equities

The balance in equities relates to an insurtech-focused equity fund which is valued based on external valuation reports received from a third-party fund manager.

D.1.6 Government bonds

Government bonds are valued at fair value in the Solvency II balance sheets and IFRS financial statements. These are based primarily in whole or in part by reference to published quotes in an active market; the value for Group and UKI is £49.6 million as at 31 December 2021. The Group and UKI have £14.0 million, as at 31 December 2021, of government bonds that are measured using a valuation technique based on assumptions that are supported by prices from observable current market transactions.

D.1.7 Corporate bonds

Corporate bonds in the Solvency II balance sheets are held at fair value. In the IFRS financial statements for Group and UKI they are also held at fair value with the exception of a small portfolio with a carrying value as at 31 December 2021 of £91.2 million (fair value: £93.4 million) classified as held to maturity under IFRS and held at amortised cost. The fair value for Solvency II is calculated using valuation techniques that are based on observable current market transactions and model inputs for recent transactions or observable market data.

D.1.8 Collective investments undertakings

Collective investment schemes are measured at fair value in the Solvency II balance sheets and the IFRS financial statements. They consist primarily of money market funds and are valued by reference to published quotes in an active market.

D.1.9 Derivatives

Derivatives are carried at fair value in both the Solvency II balance sheets and IFRS financial statements, using the valuation technique described on page 41.

D.1.10 Loans

Under IFRS loans are valued at amortised cost. The Solvency II fair value is derived using a valuation based on a risk-adjusted discounted cash flow model. When determining the risk-adjusted discount rate, inputs for the relevant base rate, average trading spread of the overall market or sector and the credit risk specific to the loan are used.

D.1.11 Insurance and other receivables

Insurance and other receivables are valued at fair value in the Solvency II balance sheets and the IFRS financial statements. Fair value is derived from discounting expected future cash flows by a risk-adjusted discount rate. Where the time value of associated cash flows is not significant, cash flows are not discounted.

D.1.12 Cash and cash equivalents

Cash and cash equivalents are valued at fair value in the Solvency II balance sheet and amortised cost in the IFRS financial statements. They comprise cash in hand and on demand deposits with banks, and short-term highly liquid investments that are readily convertible to known amounts of cash and subject to insignificant risk of change in value.

D.1.13 Assets held for sale

Assets held for sale on the Group IFRS balance sheet of £41.2 million as at 31 December 2021are included in the Group Solvency II balance sheet within property, plant and equipment (for own use). They are valued at fair value under both IFRS and Solvency II.

D.1.14 Other assets

Other assets on the Solvency II balance sheets are valued at fair value.

D.1.15 Investment in subsidiaries

In the Solvency II balance sheet of UKI, its subsidiary CIC is valued using an adjusted equity method that applies Articles 75 to 86 of the Solvency II Directive. The investment in subsidiary is included within participations.

D.2 Technical provisions

Group – Net technical provisions

As at 31 December 2021	Net best estimates £m	Risk margin £m	Total net technical provisions £m
Non-life lines of business			
Motor vehicle liability insurance	1,928.0	64.1	**1,992.1**
Other motor insurance	191.5	4.1	**195.6**
Fire and other damage to property insurance	490.6	47.8	**538.4**
General liability insurance	124.4	40.3	**164.7**
Other non-life lines of business	175.0	6.9	**181.9**
	2,909.5	**163.2**	**3,072.7**
Life lines of business			
Annuities from non-life	296.0	44.8	**340.8**
Total lines of business	**3,205.5**	**208.0**	**3,413.5**

UKI – Net technical provisions

As at 31 December 2021	Net best estimates £m	Risk margin £m	Total net technical provisions £m
Non-life lines of business			
Motor vehicle liability insurance	1,928.0	64.1	**1,992.1**
Other motor insurance	191.5	4.1	**195.6**
Fire and other damage to property insurance	490.6	47.8	**538.4**
General liability insurance	124.4	40.3	**164.7**
Other non-life lines of business	175.0	6.9	**181.9**
	2,909.5	**163.2**	**3,072.7**
Life lines of business			
Annuities from non-life	292.2	44.2	**336.4**
Total lines of business	**3,201.7**	**207.4**	**3,409.1**

CIC – Net technical provisions

As at 31 December 2021	Net best estimates £m	Risk margin £m	Total net technical provisions £m
Life lines of business			
Annuities from non-life	3.8	0.6	**4.4**
Total lines of business	**3.8**	**0.6**	**4.4**

Uncertainty associated with technical provisions

Insurance is inherently uncertain with respect to the amount and timing of future cash flows, requiring the use of judgement in estimating these cash flows. Reserving risk is a significant risk to the Group and consists predominantly of bodily injury claims from the Motor business. Some of the factors that are considered when assessing the level of technical provisions include the class of business, timeliness of notification of claims, validity of claims made against a policy and validity of the amount of the claim. At any time there is a range of possible outcomes at which the technical provisions could ultimately settle and, as time passes, the uncertainty surrounding likely claims settlement for past accident periods reduces. The uncertainty is greater for bodily injury claims due to the time it takes for these claims to settle. This is particularly true for periodic payment orders awarded to settle some of the large bodily injury claims, in which annually indexed payments are made over the lifetime of the injured party.

Future management actions are allowed for in future reinsurance premium expenses. Reinsurance in place for the Group is considered to be renewed on similar terms (unless expected to be materially different) where premium exposure continues beyond the term of current treaties.

Uncertainty with respect to policyholder behaviour is considered within the calculations for bound but not incepted business. Policy data information for new and renewal business is considered by product and business category.

Differences in valuation methodologies

For each line of business, the differences in the valuation of claims provisions best estimates from IFRS reporting to a Solvency II basis break down into a number of discrete adjustments to the net IFRS insurance liabilities comprising claims reserves and other technical provisions. The net IFRS insurance liabilities include unearned premium reserves net of deferred acquisition costs and reinsurance assets per the IFRS financial statements. These differ in materiality depending on the nature of the cash flows associated with each line of business.

For the claims provisions, differences to IFRS are as follows:

- allowances for events not in data are a requirement for Solvency II purposes whereas these are not treated in the same way under IFRS. The events not in data allowance is calculated using market standard techniques;
- explicit allowances are made for additional expenses other than claims handling, such as investment management expenses on the earned claims reserves and profit share payments due on partnership arrangements;
- all cash flows are discounted for Solvency II purposes using the risk-free yield curve provided by the Prudential Regulation Authority with volatility adjustment as appropriate. This represents a change to IFRS reporting where only periodic payment order claims are discounted; and
- cash flows for periodic payment order claims are projected using inflation assumptions relative to the prescribed risk-free discount rates for Solvency II, before volatility adjustment.

Group

As at 31 December 2021	IFRS net insurance liabilities £m	Solvency II adjustments £m	Solvency II net technical provisions £m
Non-life lines of business			
Motor vehicle liability insurance	2,082.9	(90.8)	**1,992.1**
Other motor insurance	281.4	(85.8)	**195.6**
Fire and other damage to property insurance	763.9	(225.5)	**538.4**
General liability insurance	265.1	(100.4)	**164.7**
Other non-life lines of business	150.2	31.7	**181.9**
	3,543.5	**(470.8)**	**3,072.7**
Life lines of business			
Annuities from non-life[1]	239.3	101.5	**340.8**
Total	**3,782.8**	**(369.3)**	**3,413.5**

UKI

As at 31 December 2021	IFRS net insurance liabilities £m	Solvency II adjustments £m	Solvency II net technical provisions £m
Non-life lines of business			
Motor vehicle liability insurance	2,082.9	(90.8)	**1,992.1**
Other motor insurance	281.4	(85.8)	**195.6**
Fire and other damage to property insurance	763.0	(224.6)	**538.4**
General liability insurance	265.1	(100.4)	**164.7**
Other non-life lines of business	150.2	31.7	**181.9**
	3,542.6	**(469.9)**	**3,072.7**
Life lines of business			
Annuities from non-life[1]	234.9	101.5	**336.4**
Total	**3,777.5**	**(368.4)**	**3,409.1**

CIC

As at 31 December 2021	IFRS net insurance liabilities £m	Solvency II adjustments £m	Solvency II net technical provisions £m
Life lines of business			
Annuities from non-life[1]	4.9	(0.5)	**4.4**
Total	**4.9**	**(0.5)**	**4.4**

Note:

[1] The IFRS net insurance liabilities above for annuities from non-life are different from the net approved PPO claims provision in the corresponding IFRS financial statements, which excludes an allocation of reinsurance bad debt but does include both lump sum payments and annuities.

In addition, there are further differences between IFRS and Solvency II reporting bases that apply to all lines of business:

- the calculation of premium provisions to allow for all future cash flows relating to unearned obligations under Solvency II replaces the concept of holding a provision for unearned premium, deferred acquisition costs and liability adequacy reserve, if required; and
- an industry-wide prescribed method for calculating risk margin above the best estimate technical provisions under Solvency II is applied as opposed to a margin setting process governed internally within the Group. The risk margin is calibrated once a year to ensure the approach adopted is aligned to the derivation of the SCR.

Differences in the valuation between UKI and CIC

Within the Group's Solvency II technical provisions, the valuation for risk margin differs for UKI and CIC. The risk margin for UKI is taken from the internal model whilst the risk margin for CIC is based on a standard formula calculation. No additional diversification is allowed for between the entities in the Group level risk margin.

Volatility adjustment

The volatility-adjusted risk-free discount rate is used to discount reserve cash flows for the motor liability, general liability and non-life annuity classes of business. This includes application to reserves held for PPO claims. The part of the discounting credit relating to the volatility adjustment amount net of reinsurance is in the respective balance sheets of the Group, UKI and CIC at 31 December 2021.

Recoverables from reinsurance contracts and special purpose vehicles

The Group has a range of reinsurance protection types which include property catastrophe, motor risk excess of loss, commercial property risk excess of loss, commercial liability risk excess of loss and smaller programmes to protect against travel, subsidence and creditor claims. Facultative cover has been purchased on selected commercial risks, mainly property. Motor risk excess of loss in past years has been on a risk attaching basis.

The Group allows for future reinsurance expenditure as an increase to the technical provisions on a contractually bound basis.

There are currently no special purpose vehicles in place for the Group's reinsurance.

Changes in assumptions relating to the calculation of technical provisions

There have been no key changes in assumptions relating to the calculation of technical provisions since last year.

The following represent parameter updates made to the calculation of technical provisions over the same period. For these parameter updates, the underlying methodology remains unchanged.

- the claims ABE, allowance for expenses, allowance for reinsurer counterparty default and cash flow patterns are updated throughout the year for all lines of business to allow for IFRS reserve movements and changes in the data underlying all assumptions;
- the premium provisions, balance sheet items, claims assumptions and expense assumptions are updated through the year;
- both the claims provision and the premium provision assume an Ogden discount rate of minus 0.25% for England and Wales, minus 0.75% for Scotland and minus 1.75% for Northern Ireland;
- the events not in data model has been updated for the latest volatility parameters and scenarios; and
- the risk margin reflects an updated view of the best estimate provisions, as well as model and parameter updates in the internal model.

D.3 Other liabilities

Valuation methodology

The Group values all liabilities at the amount for which they could be transferred, or settled, between knowledgeable willing parties in an arm's length transaction. In the Group, UKI and CIC Solvency II balance sheets, no adjustments are made for own credit risk, except for subordinated liabilities. There have been no changes to the bases used for recognition, valuation and estimation of other liabilities during the reporting period. The assumptions and judgements do not include any assumptions about the future or additional sources of estimation other than those noted.

The tables in D.1 summarise and compare the value of Group, UKI and CIC Solvency II liabilities with those contained in the Group, UKI and CIC IFRS financial statements.

D.3.1 Provisions other than technical provisions

Provisions other than technical provisions are valued in the Solvency II balance sheets and the IFRS financial statements at fair value. Fair value is derived from discounting expected future cash flows by a risk-adjusted discount rate. Where the time value of associated cash flows is not significant, cash flows are not discounted.

D.3.2 Deferred tax liabilities

Deferred tax liabilities arise in the CIC Solvency II balance sheet and the IFRS balance sheet of Group. All deferred tax liabilities are valued at fair value.

D.3.3 Derivatives

Derivatives are carried at fair value in the Solvency II balance sheets and IFRS financial statements using the valuation technique described on page 41.

D.3.4 Debts owed to credit institutions

Debts owed to credit institutions comprise bank overdrafts and are measured at amortised cost using the effective interest rate method in the IFRS financial statements. Given the very short-term nature of these balances this is also considered to be a reasonable approximation to fair value for the Solvency II balance sheet.

D.3.5 Financial liabilities other than debts owed to credit institution

These represent lease liabilities for corresponding ROU assets. Amounts are valued at the present value of lease payments outstanding over the term of the remaining lease. The discount rate used (i.e. incremental borrowing rate) is the same as that used for valuing corresponding ROU assets.

D.3.6 Insurance and other payables

Insurance and other payables are valued at fair value in the Solvency II balance sheets and the IFRS financial statements. Fair value is derived from discounting expected future payments by a risk-adjusted discount rate. Where the time value of associated payments is not significant, cash flows are not discounted.

D.3.7 Subordinated liabilities

The Group has subordinated guaranteed dated notes in the Solvency II balance sheets held at a fair value which is determined by reference to quoted prices in an active market less the movement in own credit risk since initial recognition. In the IFRS financial statements they are valued at amortised cost.

D.4 Alternative methods of valuation

The majority of the assets and other liabilities included in the Balance Sheet QRTs of the Group, UKI and CIC in sections G.2, G.3 and G.4 respectively are based on quoted market information or observable active market data. Where the quoted market information or observable market data is not available, an alternative method for valuation is used.

The Solvency II valuation methodology hierarchy is different from the IFRS fair value hierarchy but the methodology for valuing assets and other liabilities at fair value is consistent. The assets and other liabilities, that are not valued by reference to published quotes in an active market and would be classified as level 2 or 3 in the Group's IFRS fair value hierarchy, are classified as alternative methods of valuation under Solvency II. The Group only uses alternative valuation methods when a readily observable, external market valuation is not available, or where the relevant market is deemed to be inactive.

Estimation and uncertainty of alternative method of valuation

Alternative methods for valuation include the use of estimates and assumptions that are not market observable but based on independent third-party evidence and internally developed models. Valuation uncertainty arises from variation in the expected range of the key inputs into the models, judgements relating to model inputs, and reliance on third party valuation standards. Where an alternative valuation method is used the variation to fair value is immaterial.

The material assets and other liabilities, disclosed in the Balance Sheet QRTs in sections G.2, G.3 and G.4, that have alternative methods of valuation methods applied are as follows:

Investment property and property for own use
Property is stated at fair value in the Solvency II balance sheets. Where quoted market prices are not available, valuation techniques are used to value these properties. The fair value is determined using a methodology based on recent market transactions for similar properties, adjusted for the specific characteristics of each property within the portfolio. The fair values are based on valuations by independent registered valuers and the techniques used include some unobservable inputs.

Right of use assets and lease liabilities
In calculating the present value of lease payments, the Group uses the incremental borrowing rate at the lease commencement date unless the interest rate implicit in the lease is readily determinable. The incremental borrowing rate is determined based on available risk-free market yield to maturity pricing linked to the lease amount and term and includes a credit spread.

Participations (UKI only)
Participations of £14.1 million at 31 December 2021 (2020: £14.6 million) are valued using an adjusted equity method, which takes a share of the excess of assets over liabilities of the CIC subsidiary. This method is used because a quoted market price from an active market in the equity of the subsidiary is not available.

Government and corporate bonds
If the market for a financial asset is not active, the Group establishes the fair value by using a valuation technique. Valuation techniques include using recent arm's length market transactions between knowledgeable and willing parties (if available), reference to the current fair value of another instrument that is substantially the same, discounted cash flow analysis and option pricing models. If there is a valuation technique commonly used by market participants to price the instrument and that technique has been demonstrated to provide reliable estimates of prices obtained in actual market transactions, the Group uses that technique.

Loans and mortgages
The Solvency II fair value is derived using a valuation based on a risk-adjusted discounted cash flow model. When determining the risk-adjusted discount rate, inputs for the relevant base rate, average trading spread of the overall market or sector and the credit risk specific to the loan are used.

Derivative asset and liabilities
Fair value for derivatives is determined from quoted prices in active markets where available. Where there is no active market for an instrument, fair value is derived from prices for the derivative's components using appropriate pricing or valuation models. Valuation models use inputs for contractual terms and the specific risks inherent in the instrument, market prices, credit curves, yield curves, measure of volatility and correlations of such inputs.

Equity investments
Equity investments are stated at fair value in the Solvency II balance sheet based on external valuations from a third-party fund manager.

Subordinated liabilities
The valuation in the Solvency II balance sheet is at fair value based on reference to quoted market price less the movement in own credit risk since initial recognition. The discounted cash flow uses a discount rate that takes into account the specific characteristics of the subordinated debt adjusted for market conditions. An adjustment is made to the calculated fair value to remove the movement in the Group's own credit risk since initial recognition.

D.5 Any other information

New IFRS standards and amendments that are issued, but not yet effective for the 31 December 2021 reporting period, have not been early adopted by the Group. The Group intends to adopt these standards, if applicable, when they become effective, except for Amendments to IFRS 9 'Financial Instruments', as explained below.

These IFRS 9 amendments permitted insurers which satisfied certain criteria to defer the effective date of IFRS 9, to coincide with the expected effective date of IFRS 17. The Group conducted a high-level assessment of the three aspects of IFRS 9 and, based on current information, the impact of applying the expected loss model for the first time is currently immaterial. The Group does not expect any other significant impact on its financial statements.

The amendments required insurance entities to evaluate whether their activities were predominantly connected to insurance as at its annual reporting date immediately preceding 1 April 2016, providing an option to defer adoption of IFRS 9 if liabilities connected to insurance comprised a predominant proportion of its total liabilities as at that date. The Group concluded that it satisfied the criteria and there have been no significant changes in the Group's activities since this assessment to require a reassessment of the criteria.

As a result, the Group decided to defer the application of IFRS 9 and continues to do so.

IFRS 17 was issued by the IASB in May 2017 to replace IFRS 4 'Insurance Contracts' and is effective for reporting periods beginning on or after 1 January 2023, with comparative figures required. IFRS 17 is a comprehensive new accounting standard for all insurance contracts covering recognition and measurement, presentation and disclosure. The overall objective of IFRS 17 is to provide an accounting model for insurance contracts that is more useful and consistent for insurers and to replace the requirements of IFRS 4 that allowed insurers to apply grandfathering of previous local accounting policies.

As the vast majority of the Group's insurance contracts have a coverage period that is 12 months or less, the Group intends to adopt the premium allocation approach ("**PAA**") for all insurance and reinsurance contract groups. Applying the PAA, an entity measures the liability for remaining coverage ("**LRC**") of a group of insurance contracts on initial recognition as premiums received less any insurance acquisition cash flows paid. Subsequently, the liability for remaining coverage of a group of insurance contracts increases with premiums received and decreases to reflect an allocation of the total amount of the expected premiums receipts to profit or loss on a straight line basis as insurance services are provided. The measurement of the Group's liability for incurred claims ("**LIC**") will require the Group to determine a probability-weighted best estimate of future fulfilment cash flows, discounted to reflect the time value of money with a risk adjustment to compensate for non-financial risk.

A dedicated programme of activity throughout the year has ensured the Group remains on track to complete the necessary data and technology changes required to transition to IFRS 17 and IFRS 9 from 1 January 2023, with a period of parallel run planned for 2022.

The Group also continues to refine its accounting policy choices and accounting judgments under IFRS 17 and therefore it is not possible to accurately estimate the likely impact of IFRS 17 to the Group's financial statements at this stage.

The standard is yet to be endorsed by the UK.

In August 2020, the International Accounting Standards Board has issued 'Interest Rate Benchmark Reform Phase 2 (Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16) which is effective from 1 January 2021 and was adopted by the UK in January 2021. The key considerations are as follows:

The Phase 2 amendments provide practical relief from certain requirements in IFRS standards. These reliefs relate to modifications of financial instruments and lease contracts or hedging relationships triggered by a replacement of a benchmark interest rate in a contract with a new alternative benchmark rate. If the basis for determining the contractual cash flows of a financial asset or financial liability measured at amortised cost changed as a result of interest rate benchmark reform, then the Group updated the effective interest rate of the financial asset or financial liability to reflect the change that is required by the reform. A change in the basis for determining the contractual cash flows is required by interest rate benchmark reform if the following conditions are met:

- the change is necessary as a direct consequence of the reform; and
- the new basis for determining the contractual cash flows is economically equivalent to the previous basis – i.e. the basis immediately before the change.

When changes were made to a financial asset or financial liability in addition to changes to the basis for determining the contractual cash flows required by interest rate benchmark reform, the Group first updated the effective interest rate of the financial asset or financial liability to reflect the change that is required by interest rate benchmark reform. After that, the Group applied the policies on accounting for modifications to the additional changes.

The amendments also provide an exception to use a revised discount rate that reflects the change in interest rate when remeasuring a lease liability because of a lease modification that is required by interest rate benchmark reform. The Group has no lease contracts where changes to rental amounts are affected by the interest rate benchmark reform.

The Phase 2 amendments provide a series of temporary exceptions from certain hedge accounting requirements when a change required by interest rate benchmark reform occurs to a hedged item and/or hedging instrument that permits the hedging relationship to be continued without interruption. The Group applied the following reliefs as and when uncertainty arising from interest rate benchmark reform was no longer present with respect to the timing and amount of the interest rate benchmark-based cash flows of the hedged item or hedging instrument:

- the Group amended the designation of a hedging relationship to reflect changes that were required by the reform without discontinuing the hedging relationship; and
- when a hedged item in a cash flow hedge was amended to reflect the changes that were required by the reform, the amount accumulated in the cash flow hedge reserve was deemed to be based on the alternative benchmark rate on which the hedged future cash flows are determined.

The IASB issued 'Covid-19-related Rent Concessions beyond 30 June 2021 (Amendment to IFRS 16)' in March 2021 which was adopted by the UK in May 2021. The amendment extends, by one year, the original May 2020 amendment that permits lessees, as a practical expedient, not to assess whether particular rent concessions occurring as a direct consequence of the Covid-19 pandemic are lease modifications and instead to account for those rent concessions as if they are not lease modifications. The Group has not needed to apply this practical expedient.

SECTION E: CAPITAL MANAGEMENT

In this section:

E. CAPITAL MANAGEMENT

E.1 Own funds

E.1.1 Objective, policies and processes for managing own funds

The Group aims to manage its capital efficiently and generate long-term sustainable value for shareholders, while balancing operational, regulatory, rating agency and policyholder requirements.

The Group aims to grow its regular dividend in line with business growth.

Where the Board believes that the Group has capital which is expected to be surplus to the Group's requirements for a prolonged period, it would intend to return any surplus to shareholders. In normal circumstances, the Board expects that a solvency capital ratio around the middle of its risk appetite range of 140% to 180% of the Group's solvency capital requirement ("**SCR**") would be appropriate and it will therefore take this into account when considering the potential for special distributions. For UKI and CIC, their individual boards have approved a minimum threshold of 128% of their respective solvency capital requirements.

In the normal course of events the Board will consider whether or not it is appropriate to distribute any surplus capital to shareholders once a year, alongside the full year results.

The Group expects that one-third of the annual dividend will generally be paid in the third quarter as an interim dividend, and two-thirds will be paid as a final dividend in the second quarter of the following year. The Board may revise the dividend policy from time to time. The Group may consider a special dividend and/or a repurchase of its own shares to distribute surplus capital to shareholders.

The Group seeks to maintain sufficient economic capital consistent with its strategic aim of maintaining a credit rating in the 'A' range.

The Group uses reinsurance extensively to mitigate the impact of individual large claims and the aggregation of claims. At the 1 January 2022 renewal for its Motor excess of loss reinsurance, the Group chose to retain additional risk and increased the retention for each individual claim to £5 million (2021: £1 million with 75% placement).

The policies and processes that the Group adopts to manage its own funds to mitigate the risk of breaching regulatory and internal capital adequacy are described in the Group's Capital Management minimum standard, which includes the following key controls:

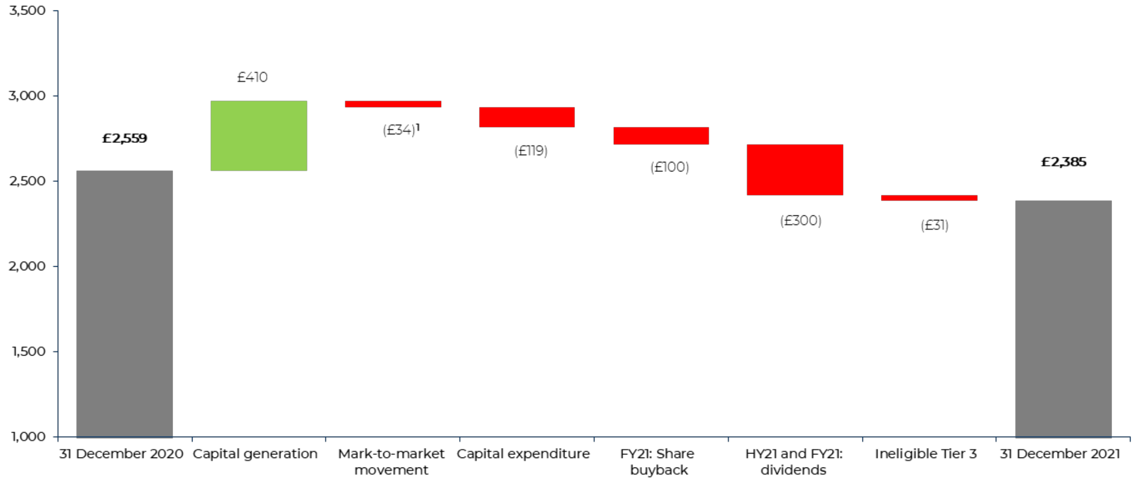
Capital forecasting
The Group's strategic plan includes a capital plan that forecasts the solvency capital requirement and coverage ratios for the Group, UKI and CIC.

Adverse capital movement
A regular review of the capital adequacy of each Group undertaking is undertaken to ensure no deterioration below the solvency capital requirement or agreed risk appetite ranges, including review of the forecast capital position and the quality of capital within own funds.

Management of dividend governance
Dividends paid by all Group undertakings are considered and approved by the responsible Board. The Company, UKI and CIC all have the right to cancel (or defer) their own dividend payments or other distributions after declaration if the undertakings cease to hold capital resources equal to or in excess of their solvency capital requirement.

There have been no material changes to the objectives, policies and processes for managing own funds over the reporting period.

Movement in Group eligible own funds during 2021 (millions)



Note:

1. Mark-to-market movements represent movements in IFRS available for sale revaluation reserve, fair value adjustments on financial investments held at amortised cost under IFRS, and fair value adjustments on investment properties, property held for own use, derivatives and yield on technical provisions.

E.1.2 Analysis of the components of own funds

The following table lists total own fund items by tier for the Group, UKI and CIC:

As at 31 December 2021	Group £m	UKI £m	CIC £m
Ordinary Share capital	145.2	580.8	—
Share premium account related to ordinary share capital	—	150.0	—
Reconciliation reserve	1,221.0	1,079.4	14.1
Total Tier 1 unrestricted own funds	**1,366.2**	**1,810.2**	**14.1**
Tier 1: restricted Tier 1 debt	360.9	—	—
Less reclassified restricted Tier 1 debt[1]	(19.4)	—	—
Total eligible Tier 1 own funds	**1,707.7**	**1,810.2**	**14.1**
Tier 2: subordinated liabilities	528.7	251.8	—
Tier 3: deferred tax assets	179.4	29.3	—
Ineligible Tier 3 capital	(31.0)	—	—
Total eligible own funds[2]	**2,384.8**	**2,091.3**	**14.1**

As at 31 December 2020	Group £m	UKI £m	CIC £m
Ordinary Share capital	148.9	580.8	—
Share premium account related to ordinary share capital	—	150.0	—
Reconciliation reserve	1,394.8	1,238.8	14.6
Total Tier 1 unrestricted own funds	1,543.7	1,969.6	14.6
Tier 1: restricted Tier 1 debt	378.6	—	—
Total eligible Tier 1 own funds	1,922.3	1,969.6	14.6
Tier 2: subordinated liabilities	532.2	257.6	—
Tier 3: deferred tax assets	104.2	—	—
Total eligible own funds[2]	2,558.7	2,227.2	14.6

Notes:

1. As at 31 December 2021 £19.4 million of the Group's restricted Tier 1 capital was reclassified as Tier 2 due to tiering restrictions
2. The difference between own funds for the Group and the total of UKI and CIC relates to own funds of non-regulated entities.

Group

Tier 1 own funds comprise Ordinary Share capital of £145.2 million (2020: £148.9 million) and the reconciliation reserve of £1,221.0 million (2020: £1,394.8 million). The reconciliation reserve consists of Solvency II excess of assets over liabilities of £2,243.4 million (2020: £2,366.5 million) less the value of own shares held of £37.5 million (2020: £40.7 million) and foreseeable capital distributions (dividends and share buyback) of £299.4 million (2020: £299.3 million) and other basic own fund items consisting of restricted Tier 3 deferred tax assets of £148.4 million (2020: £104.2 million), Ordinary Share capital of £145.2 million (2020: £148.9 million) and Tier 1 notes of £360.9 million (2020: £378.6 million) of which £19.4 million is reclassified as Tier 2 (2020: £nil million). Foreseeable capital distributions consist of dividends of £199.4 million and a share buyback of £100 million.

The Group aims to manage its capital efficiently and generate long-term sustainable value for shareholders, while balancing operational, regulatory, rating agency and policyholder requirements. The Group aims to grow its regular dividend in line with its business growth. Following the £100 million share buyback programme in 2021 and reflecting the strength of its capital position, the Group intends to commence a further share buyback programme of up to £100 million split into two tranches of up to £50 million each in H1 and H2. 2022. After the proposed final dividend and £100 million share buyback programme the solvency capital ratio was 176% as at 31 December 2021. The Group has outstanding Tier 2 debt issued in 2012 with nominal value of £250 million which can first be called from 27 April 2022. Excluding this debt, the Group's adjusted solvency ratio after the dividend and share buyback programme would have been 160% as at 31 December 2021.

On 7 December 2017, the Group issued £350.0 million of Tier 1 notes with a coupon rate of 4.75% per annum. The Group has an optional redemption date of 7 December 2027. If the notes are not repaid on that date, the rate of interest per annum will be reset. The notes are direct, unsecured and subordinated obligations of the issuer ranking pari passu and without any preference amongst themselves. The Group has the option to cancel the coupon payment. Cancellation becomes mandatory if: the Solvency condition is not met at the time of, or following, coupon payment; there is non-compliance with the SCR or the minimum capital requirement; the Group has insufficient distributable reserves; or the relevant regulator requires the coupon payment to be cancelled. Proceeds of this issuance were primarily used to fund the repurchase of £250 million subordinated guaranteed dated notes.

The Group has issued Tier 1 notes to mitigate the risk of a single refinancing date. In addition, under the Solvency II eligibility restrictions the Group previously had limited options to raise additional subordinated debt (Tier 2) capital to recover solvency. As a result of raising the Tier 1 notes and repaying half of the Tier 2 capital the Group has the ability to raise further Tier 2 capital should this be required.

Initially the Tier 2 own funds included subordinated guaranteed dated notes with a nominal value of £500 million which were issued on 27 April 2012 at a fixed rate of 9.25%. On the same date, the Group (via UKI) also entered into a 10-year interest rate swap to exchange the fixed rate of interest for a floating rate of 3-month LIBOR plus a spread of 706 basis points which was credit value adjusted to 707 basis points with effect from 29 July 2013.

On 8 December 2017, the Group repurchased £250 million nominal value of the subordinated guaranteed dated notes for a purchase price of £330.1 million including accrued interest of £2.7 million and associated transaction costs of £0.6 million.

At 31 December 2021, the Tier 2 own funds include the remaining notes, with a nominal value of £250 million, which have a redemption date of 27 April 2042 with the option to repay the notes on 27 April 2022. If the notes are not repaid on that date, the terms of the notes provide that the rate of interest will be reset at a rate of the 6-month LIBOR plus 7.91%. If LIBOR has been discontinued by this time, the terms of the notes provide for an ultimate fallback rate of interest of 9.25% for subsequent interest periods. The terms of the notes do not automatically provide for the transition of LIBOR to SONIA, which would require a separate agreement between the Group and the noteholders.

On 5 June 2020, the Group issued £260 million of subordinated Tier 2 notes at a fixed rate of 4.0%. The notes have a redemption date of 5 June 2032 and may be redeemed at the option of the Group commencing on 5 December 2031 until the maturity date. The Group has the option, in certain circumstances, to defer interest payments on the notes but to date has not exercised this right. The 2032 and 2042 notes are unsecured, and subordinated obligations of the Group, and rank pari passu without any preference among themselves. In the event of a winding-up or of bankruptcy, they are to be repaid only after the claims of all other senior creditors have been met and will rank at least pari passu with the claims of holders of other Tier 2 capital.

UKI
Tier 1 own funds comprise Ordinary Share capital of £580.8 million (2020: £580.8 million), share premium of £150.0 million (2020: £150.0 million) and the reconciliation reserve of £1,079.4 million (2020: £1,238.8 million). The reconciliation reserve consists of Solvency II excess of assets over liabilities of £1,929.5 million (2020: £2,167.6million), less foreseeable dividends in the year of £90.0 million (2020: £198.0 million), Ordinary Share capital of £580.8 million and share premium of £150.0 million (2020: £150.0). The deferred tax asset is £29.3 million (2020: £nil).

Tier 2 own funds comprise the subordinated guaranteed dated loan from the Company's parent, Direct Line Insurance Group plc, issued on 27 April 2012 at a fixed rate of 9.5%. As discussed above, on the same date, the Company also entered into a 10-year interest rate swap to exchange the fixed rate of interest for a floating rate of 3-month LIBOR plus a spread of 706 basis points which was credit value adjusted to 707 basis points with effect from 29 July 2013.

On 29 February 2019 the Company's Board passed a resolution to repay £250 million of subordinated loan and this was approved by the DLIG Board. The repayment date was 7 March 2019. The remaining notes with a nominal value of £250 million have a redemption date of 27 April 2042.

The loan is an unsecured, subordinated obligation of the Company. In the event of a winding-up or of bankruptcy, this is to be repaid only after the claims of all senior creditors have been met.

The Company has the option to defer interest payments in certain circumstances on the notes but to date has not exercised this right.

CIC
Tier 1 own funds comprise Ordinary Share capital of £100 (2020: £100) and the reconciliation reserve. The reconciliation reserve consists of Solvency II excess of assets over liabilities of £14.1 million (2020: £14.6 million) less ordinary share capital of £100 (2020: £100).

Eligible own funds by tier to cover the solvency capital requirement and minimum capital requirement

Group
The Group's SCR as at 31 December 2021 was £1,354.2 million; as there is an eligibility limit that the sum of Tier 2 and Tier 3 capital shall not exceed 50% of the SCR, a restriction on available own funds to meet the SCR of £31.0 million was applicable to the Group at 31 December 2021 (2020: £nil). Total eligible own funds to meet the SCR were £2,384.8 million, consisting of Tier 1 – unrestricted of £1,366.2 million, eligible Tier 1 – restricted of £341.5 million (at 31 December 2021 £19.4 million of the Group's total restricted Tier 1 capital of £360.9 million was reclassified at Tier 2 due to tiering restrictions (2020: £nil)), Tier 2 of £528.7 million and Tier 3 of £148.4 million. The amount of Tier 2 and Tier 3 capital permitted under the Solvency II regulations is 50% of the Group's SCR and of Tier 3 alone is less than 15%. The Group has Tier 2 plus Tier 3 ineligible own funds of £31.0 million.

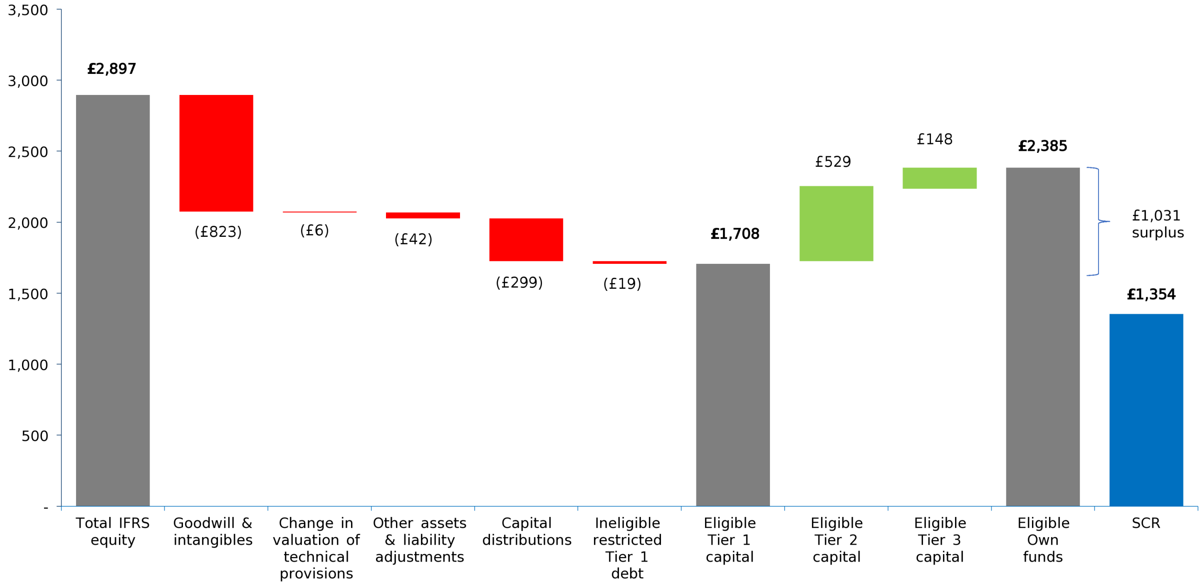
The Group's MCR as at 31 December 2021 was £533.0 million; Tier 3 own funds are not eligible to cover the MCR. The limit that Tier 2 own funds shall not exceed 20% of the MCR is the only other restriction of eligible own funds to meet the MCR. The total eligible own funds to meet the MCR were £1,814.3 million, consisting of unrestricted Tier 1 of £1,366.2 million, eligible restricted Tier 1 of £341.5 million and restricted Tier 2 of £106.6 million. The restriction that Tier 1 – restricted own funds should not exceed 20% of total Tier 1 own funds when satisfying the requirement that eligible Tier 1 items shall be at least 80% of the MCR was not applicable to the Group.

UKI
There were no restrictions on UKI's own funds to meets its SCR as at 31 December 2021 of £1,304.7 million (2020: £1,299.6 million).

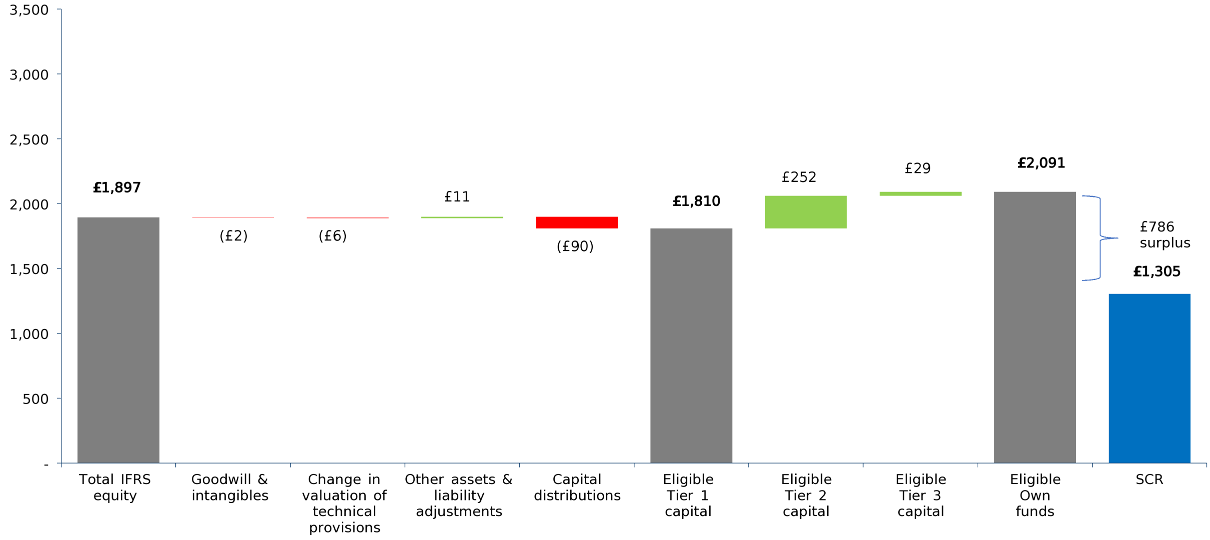
The UKI MCR as at 31 December 2021 was £529.9 million; Tier 3 own funds are not eligible to cover the MCR. The restriction that limits Tier 2 items to 20% of the MCR was the only restriction. Total eligible own funds to meet the MCR were £1,916.2 million, consisting of unrestricted Tier 1 of £1,810.2 million and restricted Tier 2 of £106.0 million.

CIC
As at 31 December 2021, the CIC SCR was £0.8 million and the MCR was £3.1 million. CIC remains within its quantitative eligibility limits for tiers 1, 2 or 3.

Reconciliation of Group equity in the IFRS financial statements to Solvency II eligible own funds as at 31 December 2021 (millions)



Reconciliation of UKI equity in the IFRS financial statements to Solvency II eligible own funds as at 31 December 2021 (millions)



Reconciliation of IFRS equity and Solvency II excess of assets over liabilities (eligible Tier 1)

As at 31 December 2021	Group £m	UKI £m	CIC £m
Total equity	2,896.7	1,896.6	13.7
Goodwill and intangible assets	(822.5)	(2.4)	—
Change in valuation of technical provisions	(5.8)	(5.7)	0.5
Other asset and liability adjustments	(41.9)	11.7	(0.1)
Ineligible restricted Tier 1 debt	(19.4)	—	—
Foreseeable capital distributions	(299.4)	(90.0)	—
Excess of assets over liabilities (eligible Tier 1)	**1,707.7**	**1,810.2**	**14.1**

Neither UKI nor CIC had any items deducted from own funds or any restrictions that would affect the availability and transferability of own funds within the undertakings.

At the Group level there were no anticipated restrictions on the fungibility of own funds within Group entities except for the deferred tax asset which is held in DLIS and no items of own funds were dedicated to absorb specific losses. There were no restrictions on the transferability of own funds between Group entities.

E.2 Solvency capital requirement and minimum capital requirement (unaudited)

Solvency capital requirement and minimum capital requirement at the end of the reporting period

Group partial internal model solvency capital requirement

As at 31 December	2021 £m	2020 £m
SCR for the Group companies excluding UKI and its subsidiary (CIC), using integration technique 1	**49.5**	40.3
SCR for UKI using the Internal Economic Capital Model	**1,304.7**	1,299.6
Consolidated Group SCR	**1,354.2**	1,339.9

The Group received PRA approval to use a partial internal model for the calculation of its Group and solo SCRs from 1 July 2016. The SCR is not subject to supervisory assessment.

The integration technique to be used to integrate the partial internal model into the SCR standard formula is integration technique 1 as set out in Annex XVIII of the Commission Delegated Regulation (EU) 2015/35.

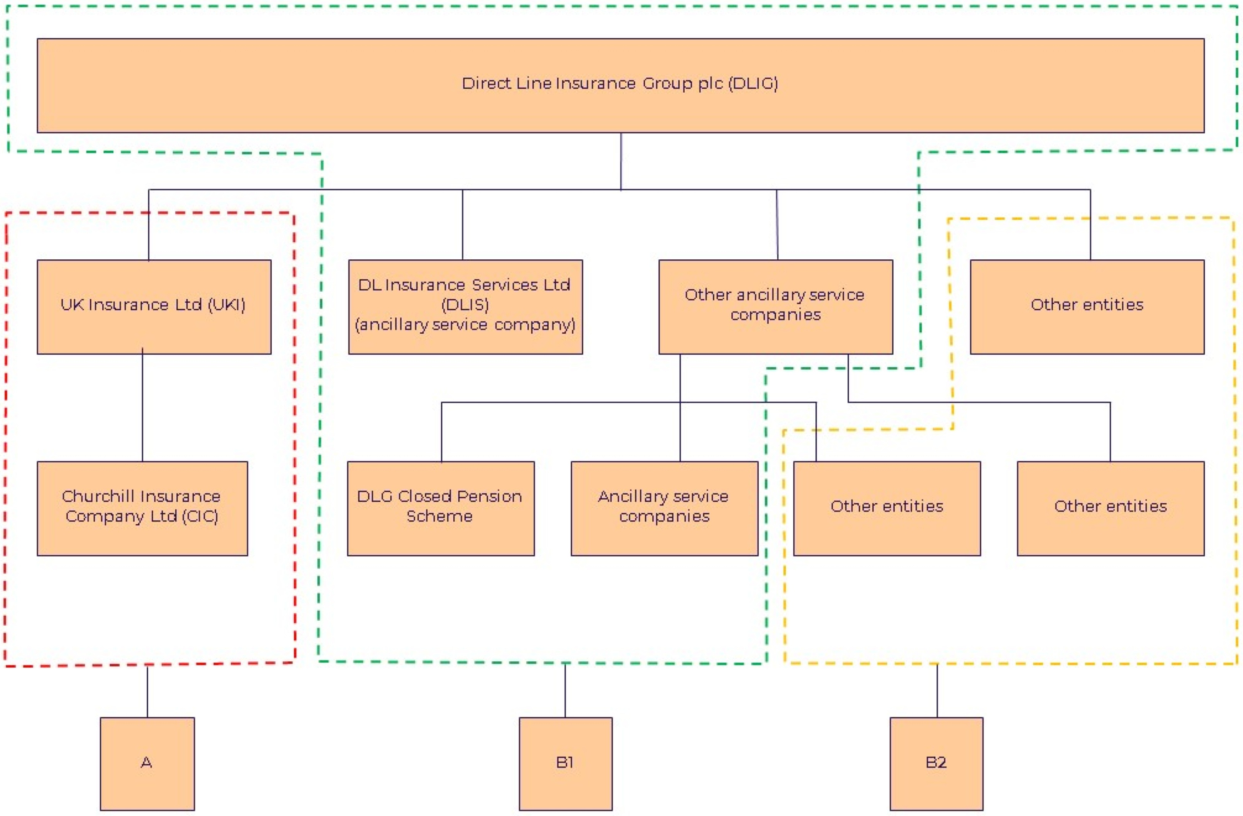
The undertakings included in the scope of the model for the calculation of the Group SCR are:

- Direct Line Insurance Group plc
- U K Insurance Limited
- Churchill Insurance Company Limited

The internal model is approved to calculate the solo SCR for UKI.

The notional standard formula of the Group holding company, excluding UKI, is calculated partly on a consolidated basis and partly on the basis of a standard formula equity risk shock for strategic participations in respect of certain entities.

The Group SCR is calculated by adding together the SCR for UKI calculated using the Internal Economic Capital Model (A) and a standard formula SCR for the non-UKI companies in the Group (B1). This standard formula SCR uses a consolidated balance sheet approach, except for certain entities (B2) which are treated as equity investments of the Group. The diagram on page 57 illustrates the generic approach. Note this diagram does not represent a structure chart of the Group - the Group structure chart is found on page 9 of this report.



The solo SCR for UKI includes all risks arising from CIC due to UKI owning 100% of CIC. The solo SCR for CIC is calculated using the standard formula.

The calculation of the solo SCR for CIC and for DLIG (excluding UKI) using the standard formula uses the parameters as referred to in the Solvency II regulations. The Group did not apply for undertaking specific parameters as referred to in Chapter V – Section 12 to be used. Simplified calculations as referred to in Subsection 6 of the Solvency II Delegated Regulation 2015/35 are not used.

There are no significant restrictions to the fungibility and transferability of own funds eligible for covering the Group SCR except for the deferred tax asset which is held in DLIS.

Due to the integration technique adopted, there are no diversification benefits taken between UKI and the Group entities. There are diversification benefits assumed between the Group entities in group B as far as has been allowed for by the standard formula. The contribution of risk from CIC to UKI is based on a CIC standard formula calculation, excluding any inter-company reinsurance provided to CIC from UKI. An uplift is applied to the CIC insurance risk calculation to reflect the limitations of the standard formula in dealing with the risks arising from periodic payment orders.

The Internal Economic Capital Model approach used to calculate the solo SCR for UKI is the same as used to calculate the contribution of UKI to the Group SCR.

Summary of entity solvency capital requirements and minimum capital requirements

As at 31 December 2021	SCR £m	MCR £m
Direct Line Insurance Group plc	**1,354.2**	**533.0**
U K Insurance Limited	**1,304.7**	**529.9**
Churchill Insurance Company Limited	**0.8**	**3.1**

Group solvency capital requirement – further information

As at 31 December	**Group partial internal model 2021 £m**	Group partial internal model 2020 £m
Non-life underwriting risk	**–**	–
Life underwriting risk	**–**	–
Health underwriting risk	**–**	–
Market risk	**45.0**	31.8
Counterparty default risk	**12.3**	18.1
Total – undiversified risk	**57.3**	49.9
Diversification	**(7.8)**	(9.6)
Basic SCR	**49.5**	40.3
Operational risk	–	–
Loss absorbing capacity of deferred taxes	**–**	–
Other adjustments	**–**	–
UKI SCR	**1,304.7**	1,299.6
Group SCR	**1,354.2**	1,339.9

Material changes over the year

Changes in the Group SCR are driven in part from changes in the UKI SCR which are discussed below. In respect of the element of the Group SCR attributed to the holding company, the increase is primarily due to the purchase of property leases and further strategic insurtech-focused investments.

Group minimum capital requirement – further information

The Group MCR has decreased from £538.6 million to £533.0 million over the reporting period due to a reduction in UKI's MCR as discussed below.

UKI solo solvency capital requirement – further information

As at 31 December	**Internal Economic Capital Model 2021 £m**	Internal Economic Capital Model 2020 £m
Insurance risk	**1,164.9**	1,101.3
Market risk	**551.1**	564.2
Counterparty default risk	**66.5**	65.9
Operational risk	**247.9**	276.9
Risk margin volatility	**41.9**	40.1
Total – undiversified risk	**2,072.3**	2,048.4
Diversification	**(695.3)**	(683.7)
Total – diversified	**1,377.0**	1,364.7
Loss absorbing capacity of deferred taxes	**(72.3)**	(65.1)
UKI SCR	**1,304.7**	1,299.6

Material changes over the year

The increase in insurance risk is due to internal model and exposure updates, particularly in relation to property and changes to the motor reinsurance programme where the retention levels have increased.

Market risk has decreased primarily due to movements in asset under management values and mix changes, together with fewer PPOs meaning less long duration investment.

Counterparty default risk has increased slightly due to lower average credit quality, although this is partly offset by the lower reinsurer exposure as a result of the changes to the motor reinsurance programme.

The reduction in operational risk reflects a reduction in change risk which reflects the completion of the core elements of the Group's technology platform and the reduction in planned change programme spend in 2022.

UKI minimum capital requirement – further information

The UKI MCR has decreased from £535.3 million to £529.9 million over the reporting period, reflecting a change in business mix and an overall slight reduction in technical provisions.

CIC solo solvency capital requirement – further information

As at 31 December	**Standard formula 2021 £m**	Standard formula 2020 £m
Non-life underwriting risk	**–**	0.1
Life underwriting risk	**0.2**	0.1
Health underwriting risk	**–**	–
Market risk	**0.3**	0.4
Counterparty default risk	**0.4**	0.4
Total – undiversified risk	**0.9**	1.0
Diversification	**(0.2)**	(0.2)
Basic SCR	**0.7**	0.8
Operational risk	**0.1**	0.1
CIC SCR	**0.8**	0.9

Material changes over the year

The decrease to the CIC SCR reflects movements in the reserves over the period.

CIC minimum capital requirement – further information

There have been no material movements in the CIC MCR, which has decreased from £3.3 million to £3.1 million over the reporting period.

Simplified calculation in the standard formula

No material simplifications have been used to derive the SCR using the standard formula.

E.3 Use of the duration-based equity risk sub-module in the calculation of the solvency capital requirement (unaudited)

The duration-based equity risk sub-module is not used in the calculation of the SCR for the Group, UKI or CIC.

E.4 Use of the internal model (unaudited)

Capital management
The Internal Economic Capital Model's primary use is to calculate the SCR. The Internal Economic Capital Model is used to assess the impact of capital management decisions and is an input into the Own Risk and Solvency Assessment to support dividend planning and budgeting.

Risk management
The Internal Economic Capital Model is used to quantify risks on the Material Risks Register and is also used to highlight the key risks to the Group. Furthermore, the Internal Economic Capital Model supports the risk appetite setting process and the review of financial forecasts, by providing stressed scenarios to give the Group's Executive Committee a range of possible outcomes.

Reinsurance management
Through the modelling of the base and alternative reinsurance structures, the Internal Economic Capital Model supports catastrophe and motor reinsurance management, by assessing the impact on profitability and capital requirements.

Portfolio management
The Internal Economic Capital Model is used to understand the relative risk associated with different cohorts of the business and is used to advise on capital allocation to business categories. New initiatives and opportunities involve the Internal Economic Capital Model to indicate the impact on the SCR and associated return on equity.

Investment management
The Internal Economic Capital Model is used to assess the risk associated with the current asset mix, the impact of changes to the SCR and asset risk of changes in proposed asset portfolios and as a feed into the analysis of liquidity requirements which in turn impact the strategic investment decisions.

Scope of the internal model

The partial internal model calculates the Group SCR by adding together the SCR for UKI, calculated using the Internal Economic Capital Model, and a standard formula SCR for the non-UKI companies in the Group. This standard formula uses a consolidated balance sheet approach, except for certain entities which are treated as equity investments of the Group. See the diagram on page 57 which illustrates this approach.

The internal model is approved to calculate the solo SCR for UKI.

The notional standard formula for the Group companies (Section E.2), excluding UKI and its subsidiary CIC, is calculated partly on a consolidated basis and partly based on a standard formula equity risk shock for strategic participations in respect of certain entities. The underlying assets and liabilities of entities in group B1 are consolidated before applying the standard formula calculation. This sub-group consists of the Group holding company, ancillary service companies and the Group's closed pension scheme. The latter is not an entity within the Group but exposes it to pension scheme risk through its sponsor DLIS.

The risks included in the notional standard formula of the Group companies (excluding UKI and its subsidiary) are predominantly market risk and counterparty default risk. Market risk arises from the assets held at Group level and those held by the associated Group pension scheme. Counterparty default risk arises mainly from debtor balances and cash holdings.

The scope of the Internal Economic Capital Model is defined in terms of legal entities and risk categories that are represented in the Internal Economic Capital Model SCR. The Internal Economic Capital Model is considered a full internal model for the calculation of the solo UKI SCR as it includes all quantifiable material risks.

The following legal entities are included in the Internal Economic Capital Model SCR:

- U K Insurance Limited
- Churchill Insurance Company Limited

All other legal entities within the Group are excluded from the scope of the Internal Economic Capital Model.

The following risk types are included in the scope of the Internal Economic Capital Model:

- underwriting risk;
- reserving risk;
- catastrophe risk;
- market risk;
- counterparty default risk;
- liquidity risk; and
- operational risk.

The following risk types are not within the scope of the Internal Economic Capital Model, being regarded as non-quantifiable risks:

- strategic risk;
- reputational risk; and
- regulatory risk.

The Internal Economic Capital Model includes an allowance for the loss absorbing capacity of deferred taxes due to the potential for tax carry back. Risks arising due to periodic payment orders are assessed in underwriting risk and reserving risk. Market risk includes the assessment of interest rate risk arising from assets and liabilities. Liquidity risk is considered in the Internal Economic Capital Model but is assessed at zero due to the amount of liquid assets held.

Methods used to calculate the probability distribution forecast and the solvency capital requirement

Internal Economic Capital Model overview

The Internal Economic Capital Model is a full internal model as outlined by Article 112 of the Solvency II Directive. The calculation kernel within the Internal Economic Capital Model is the DLG Insurance Internal Capital Engine.

The DLG Insurance Internal Capital Engine uses stochastic processes and Monte-Carlo simulation methods to investigate the uncertainty in real world financial quantities over time by modelling real world processes as predictable movements onto which a random element is added. This random element represents the level of uncertainty within the process being modelled. Risk is measured by simulating several thousand random outcomes and observing the distribution of the outputs.

The DLG Insurance Internal Capital Engine produces future financial statements as well as a breakdown of the impact on the balance sheet by risk type. This enables the Group to understand the potential real-world impact of a scenario and allows for integration into the risk management system of the Group. The DLG Insurance Internal Capital Engine simulates many possible closing balance sheets and provides a range of possible outcomes from which probabilistic measures can be obtained. This method allows the SCR to be set by measuring the 99.5th value-at-risk of the movement in own funds over a one-year period.

The DLG Insurance Internal Capital Engine is structured around a series of dependent modelling components. Each component models a specific aspect of an insurance company's operations, for example claims payments or reinsurance recoveries, and may depend on previous components, for example claims depend on a claims inflation component. The components within the DLG Insurance Internal Capital Engine may contribute to one or more of the risk types being assessed.

Internal Economic Capital Model structure

All financial modelling is a simplification of the real world. Within the DLG Insurance Internal Capital Engine this is partly addressed by grouping potential risks into homogenous cohorts rather than modelling each policy, claim or risk individually. The balance between aggregation and individual detail is important and will vary depending on the materiality and complexity of the risk being modelled.

The business structure in the DLG Insurance Internal Capital Engine is split across the following categories: Motor, Home, Rescue and other personal lines, Commercial and run-off business. Within each category there are classes where the risks are different. For example, Home is split into own brands and partnerships due to profit sharing arrangements and Commercial is analysed by risk type (motor, property and liability) and channel (direct and broker). This allows for the model output to be useful and it also makes it more straightforward to source appropriate data.

The biggest risk that the Group faces is uncertainty regarding claims. Within each category, claims are modelled by loss types reflecting the different risks and influences on each type of claims. For example, Motor claims are modelled as attritional third-party property damage, attritional third-party bodily injury (capped), attritional other, large, periodic payment orders and catastrophe claims. The modelling of detailed loss types reflects the materiality, risk characteristics and homogeneity of the underlying risks being considered.

Difference between standard formula and internal model used

There are significant differences in both model structure and parameters when comparing the standard formula and the internal model. The Internal Economic Capital Model has been designed to model business processes whereas the standard formula focuses purely on a silo approach to considering specific risks with an aggregation methodology overlaid on top. The Internal Economic Capital Model is primarily calibrated to UKI data and uses expert judgement from the business, whereas the standard formula is calibrated using industry-based data and expert judgements.

There are significant differences between the Internal Economic Capital Model and standard formula SCR methodologies. The most significant differences are outlined below:

Profit
The Internal Economic Capital Model allows for expected profit over the year. The standard formula model does not, and this can be a significant difference.

Diversification
The correlations within the Internal Economic Capital Model SCR have been based on UKI data and expert judgement from the business. The standard formula SCR uses correlations that have been calibrated to industry-based data and expert judgement. The correlation parameters between risk types in the Internal Economic Capital Model are lower than for the standard formula. In particular, the relationship between insurance risk and market risk is assumed to be lower in the Internal Economic Capital Model than that assumed in the standard formula.

Market risk
The major difference relates to the use of an economic scenario generator by the Internal Economic Capital Model to assess market risk. The assumptions made within the economic scenario generator differ from those made by the standard formula, which primarily considers shocks in specific market variables and then attempts to apply a dependency structure on top. The economic scenario generator considers: the related evolution of economic variables over the year; considers movements in cash flows; and changes in the balance sheet in a year’s time. This results in differences between the Internal Economic Capital Model and the standard formula in relation to interest rate risk, property risk and spread risk.

Non-life underwriting risk
The Internal Economic Capital Model assumes a lower level of one-year reserve volatility than that prescribed by the standard formula. The Internal Economic Capital Model SCR also considers the variability of the premium provision as at one year after the valuation date. The standard formula SCR does not consider the risk associated with this provision. All of UKI’s insurance business is included within the non-life underwriting risk module of the Internal Economic Capital Model. The standard formula non-life underwriting risk calculation excludes the annuity portion of approved periodic payment order claims, which are considered within the life underwriting risk component, as well as the income protection business, which is considered within the health underwriting risk component. This further reduces the diversification effect within non-life underwriting risk in the standard formula compared with the Internal Economic Capital Model. This diversification effect is however allowed for in the standard formula when aggregating the various underwriting risk components. The Internal Economic Capital Model allows for periodic payment orders explicitly including longevity, wage inflation, propensity and reinsurance indexation. The Internal Economic Capital Model SCR utilises specialist catastrophe modelling software and focuses on those catastrophe types that have affected UKI in the past or that are most likely given the UKI portfolio. The standard formula SCR is based on prescribed scenarios which are in turn based on the Solvency II lines of business written by UKI.

Risk margin volatility
The Internal Economic Capital Model SCR includes allowance for risk margin volatility.

Operational risk
The Internal Economic Capital Model SCR basis uses a scenario-based approach which represents the UKI risk profile, considering its current risk and control environment. The standard formula calculates the SCR for operational risk, based on the premium earned in the last 12 months, the Solvency II technical provisions at the valuation date and the change in earned premium when compared to the 12 months prior to the last 12 months.

Tax
The UKI standard formula takes credit for any deferred tax liability which may exist in UKI; however, this is not allowed for in the Internal Economic Capital Model SCR.

CIC
The method used to calculate the Internal Economic Capital Model capital charge for the risk relating to CIC is to use an uplifted standard formula calculation, with specific allowance for periodic payment order risk based on the Internal Economic Capital Model calibration, with no diversification benefit applied for the rest of UKI.

Risk measure and period used in the internal model

The Group’s partial internal model uses a confidence level of 99.5% over a one-year period and therefore provides an equivalent level of protection for policyholders.

Nature and appropriateness of the data used in the Internal Economic Capital Model

The Internal Economic Capital Model uses both internal data and external data to calibrate parameters. Key internal data is primarily comprised of claims data which is also used for reserving and pricing purposes. The data is directly related to the risks on the balance sheet and those expected to be assumed in the next 12 months of underwriting, and therefore appropriate to use for the calibration of the Internal Economic Capital Model following adjustments for changes in exposure and risk mix.

Where there is insufficient internal data the Internal Economic Capital Model relies on external models and data. The key risks which utilise external models and data are catastrophe risk and market risk. External models and data are subject to the same standards as internally developed models. Market studies and industry data are used as a reference and as validation points. The Institute and Faculty of Actuaries Periodic Payment Order working party results are considered.

E.5 Non-compliance with the minimum capital requirement and non-compliance with the solvency capital requirement

The Group is compliant with the MCR and SCR.

E.6 Any other information

There is no other information.

SECTION F: OTHER INFORMATION

In this section:

F. OTHER INFORMATION

F.1 Approval by the Boards of the Single Solvency and Financial Condition Report for the year ended 31 December 2021

We certify that:

- the Single Solvency and Financial Condition Report has been properly prepared in all material respects in accordance with the PRA rules and Solvency II Regulations; and

we are satisfied that:

- throughout the financial year in question, the insurer has complied in all material respects with the requirements of the PRA rules and Solvency II Regulations as applicable to the insurer; and
- it is reasonable to believe that, at the date of the publication of the Single Solvency and Financial Condition Report, the insurer has continued so to comply, and will continue so to comply in the future.

On behalf of the Boards.

NEIL MANSER
CHIEF FINANCIAL OFFICER
24 March 2022

F.2 Report of the external independent auditor to the Directors of Direct Line Insurance Group plc ("the Group") 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 Group 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 2021:

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Group SFCR of the Company as at 31 December 2021, ('the Narrative Disclosures subject to audit'); and
- Direct Line Insurance Group plc templates S.02.01.02, S.22.01.22, S.23.01.22, and S32.01.22.
- U K Insurance Limited templates S.02.01.02, S.12.01.02, S.17.01.02, S.22.01.21, S.23.01.01 and S.28.01.01.
- Churchill Insurance Company Limited templates S.02.01.02, S.12.01.02, S.17.01.02, S.22.01.21, S.23.01.01, S.25.01.21 and S.28.01.01.

The Narrative Disclosures subject to audit and the Group Templates and Solo Templates subject to audit are collectively referred to as the 'relevant elements of the Group 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:

- information contained within the relevant elements of the Group SFCR set out above which are, or derive from the Solvency Capital Requirement, as identified in the Appendix to this report;
- the 'Executive Summary', 'Business and performance', 'System of governance' and 'Risk profile' elements of the Group SFCR;
- Direct Line Group plc templates S.05.01.02, S05.02.01 and S.25.02.22;
- U K Insurance Limited templates S.05.02.01, S.05.01.02, S.19.01.21, and S.25.03.21;
- Churchill Insurance Company Limited templates S.05.02.01, S.05.01.02 and S.19.01.21;
- the written acknowledgement by management of their responsibilities, including for the preparation of the Group SFCR ('the Responsibility Statement');
- Information which pertains to an undertaking that is not a Solvency II undertaking and has been prepared in accordance with PRA rules other than those implementing the Solvency II Directive or in accordance with an EU instrument other than the Solvency II regulations ('the sectoral information').

To the extent the information subject to audit in the relevant elements of the Group SFCR includes amounts that are totals, sub-totals or calculations derived from the Other Information, we have relied without verification on the Other Information.

In our opinion, the information subject to audit in the relevant elements of the Group SFCR of the Company as at 31 December 2021 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, and applicable law. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the relevant elements of the Group 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 Group SFCR in the UK, including the Financial Reporting Council's (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', 'Capital Management' and other relevant disclosures sections of the Group SFCR, which describe the basis of accounting. The Group 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 Group SFCR is required to be published, and intended users include but are not limited to the PRA. As a result, the Group SFCR may not be suitable for another purpose. Our opinion is not modified in respect of these matters.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that the Directors' use of the going concern basis of accounting in the preparation of the SFCR is appropriate.

Our evaluation of the directors' assessment of the company's ability to continue to adopt the going concern basis of account involves:

- assessing the Group's process around the going concern assessment performed by management;
- evaluating the historical accuracy of forecasts prepared by management;
- challenging the reasonableness of the profit forecasts used by management; and
- evaluating the Group's current year performance and year end liquidity and solvency capital position.

We considered as part of our risk assessment the nature of the group, its business model and related risks including where relevant the impact of climate change, Brexit and Covid-19, the requirements of the applicable financial reporting framework and the system of internal control.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Other Information

The Directors are responsible for the Other Information.

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

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 Group SFCR, or our knowledge obtained in the course of 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 Group SFCR themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this Other Information, we are required to report that fact.

We have nothing to report in this regard.

Responsibilities of Directors for the Group Solvency and Financial Condition Report

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

The Directors are also responsible for such internal control as they determine is necessary to enable the preparation of a Group 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 Group Solvency and Financial Condition Report

It is our responsibility to form an independent opinion as to whether the relevant elements of the Group 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 Group 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 Group SFCR.

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

Extent to which the audit was considered capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below.

We considered the nature of the company's industry and its control environment, and reviewed the company's documentation of their policies and procedures relating to fraud and compliance with laws and regulations. We also enquired of management, internal audit and the Audit Committee about their own identification and assessment of the risks of irregularities.

We obtained an understanding of the legal and regulatory framework that the company operates in, and identified the key laws and regulations that:

- had a direct effect on the determination of material amounts and disclosures in the SFCR. These included Solvency II as implemented in the UK; and
- do not have a direct effect on the SFCR but compliance with which may be fundamental to the company's ability to operate or to avoid a material penalty. These included Companies Act 2006 and related Company Law, the company's operating licence environmental regulations.

We discussed among the audit engagement team, including relevant internal specialists regarding the opportunities and incentives that may exist within the organisation for fraud and how and where fraud might occur in the financial statements.

As a result of performing the above, we identified the greatest potential for fraud in the valuation of the actuarial best estimate. We engaged our actuarial specialists to review the range of reasonable estimates and assess whether the actuarial best estimate reported under IFRS can be considered a best estimate liability under Solvency II.

In common with all audits under ISAs (UK), we are also required to perform specific procedures to respond to the risk of management override. In addressing the risk of fraud through management override of controls, testing the appropriateness of journal entries and other adjustments; assessing whether the judgements made in making accounting estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

In common with all audits under ISAs (UK), we are also required to perform specific procedures to respond to the risk of management override. In addressing the risk of fraud through management override of controls, testing the appropriateness of journal entries and other adjustments; assessing whether the judgements made in making accounting estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

In addition to the above, our procedures to respond to the risks identified included the following:

- reviewing SFCR disclosures by testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described as having a direct effect on the financial statements;
- performing analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud;
- enquiring of management, internal audit and Direct Line Insurance Group plc's in-house legal counsel concerning actual and potential litigation and claims, and instances of non-compliance with laws and regulations; and
- reading minutes of meetings of those charged with governance and reviewing correspondence with the PRA and FCA.

Other Matter

The Group has authority to calculate its Group Solvency Capital Requirement using a partial internal model ("**the Model**"), and U K Insurance Solvency Capital Requirement using an internal model ("**the Model**") approved by the Prudential Regulation Authority in accordance with the Solvency II Regulations. In forming our opinion (and in accordance with PRA Rules), we are not required to audit the inputs to, design of, operating effectiveness of and outputs from the Model, or whether the Model is being applied in accordance with the Company's application or approval order.

Report on Other Legal and Regulatory Requirements

Sectoral Information

In our opinion, in accordance with Rule 4.2 of the External Audit Chapter of the PRA Rulebook, the sectoral information has been properly compiled in accordance with the PRA rules and EU instruments relating to that undertaking from information provided by members of the group and the relevant insurance group undertaking.

Other Information

In accordance with Rule 4.1 (3) of the External Audit Chapter of the PRA Rulebook for Solvency II firms we are also required to consider whether the Other Information is materially inconsistent with our knowledge obtained in the audit of Direct Line Insurance Group 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.

Use of our Report

This report is made solely to the Directors of Direct Line Insurance Group 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 Group 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.

Adam Addis ACA (Senior Statutory Auditor)

For and on behalf of Deloitte LLP

Statutory Auditor

London, United Kingdom

24 March 2022

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

Direct Line Insurance Group plc (Group partial internal model)

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

- **The following elements of Group template S.02.01.02:**
  - Row R0550: Technical provisions – non-life (excluding health) – risk margin
  - Row R0590: Technical provisions – health (similar to non-life) – risk margin
  - Row R0640: Technical provisions – health (similar to life) – risk margin
  - Row R0680: Technical provisions – life (excluding health and index-linked and unit-linked) – risk margin
  - Row R0720: Technical provisions – Index-linked and unit-linked – risk margin
- **The following elements of Group template S.22.01.22:**
  - Column C0030: Impact of transitional measure on technical provisions
  - Row R0010: Technical provisions
  - Row R0090: Solvency Capital Requirement
- **The following elements of Group template S.23.01.22:**
  - Row R0020: Non-available called but not paid in ordinary share capital at group level
  - Row R0060: Non-available subordinated mutual member accounts at group level
  - Row R0080: Non-available surplus at group level
  - Row R0100: Non-available preference shares at group level
  - Row R0120: Non-available share premium account related to preference shares at group level
  - Row R0150: Non-available subordinated liabilities at group level
  - Row R0170: The amount equal to the value of net deferred tax assets not available at the group level
  - Row R0190: Non-available own funds related to other own funds items approved by supervisory authority
  - Row R0210: Non-available minority interests at group level
  - Row R0380: Non-available ancillary own funds at group level
  - Rows R0410 to R0440: Own funds of other financial sectors
  - Row R0680: Group SCR
  - Row R0690: Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included in D&A
  - Row R0740: Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring-fenced funds
  - Row R0750: Other non-available own funds
- **Elements of the Narrative Disclosures subject to audit identified as ‘unaudited’**

U K Insurance Limited (Solo Internal Model)

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

- **The following elements of template S.02.01.02:**
  - Row R0550: Technical provisions – non-life (excluding health) – risk margin
  - Row R0590: Technical provisions – health (similar to non-life) – risk margin
  - Row R0640: Technical provisions – health (similar to life) – risk margin
  - Row R0680: Technical provisions – life (excluding health and index-linked and unit-linked) risk margin
  - Row R0720: Technical provisions – Index-linked and unit-linked – risk margin
- **The following elements of template S.12.01.02:**
  - Row R0100: Technical provisions calculated as a sum of BE and RM – Risk margin
  - Rows R0110 to R0130: Amount of transitional measure on technical provisions
- **The following elements of template S.17.01.02:**
  - Row R0280: Technical provisions calculated as a sum of BE and RM – Risk margin
  - Rows R0290 to R0310: Amount of transitional measure on technical provisions
- **The following elements of template S.22.01.21:**
  - Column C0030: Impact of transitional measure on technical provisions
  - Row R0010: Technical provisions
  - Row R0090: Solvency Capital Requirement

- **The following elements of template S.23.01.01:**
  - Row R0580: SCR
  - Row R0620: Ratio of Eligible own funds to SCR
  - Row R0740: Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring-fenced funds
- **The following elements of template S.28.01.01 / S.28.02.01:**
  - Row R0310: SCR
  - Row R0320: MCR cap
  - Row R0330: MCR floor
- **Elements of the Narrative Disclosures subject to audit identified as ‘unaudited’**

Churchill Insurance Company Limited (Solo standard formula)

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

- **The following elements of template S.12.01.02:**
  - Rows R0110 to R0130: Amount of transitional measure on technical provisions.
- **The following elements of template S.17.01.02:**
  - Rows R0290 to R0310: Amount of transitional measure on technical provisions.
- **The following elements of template S.22.01.21:**
  - Column C0030: Impact of transitional measure on technical provisions.
- **Elements of the Narrative Disclosures subject to audit identified as ‘unaudited’.**

F.3 Forward-looking statements disclaimer

Certain information contained in this document, including any information as to the Group's strategy, plans or future financial or operating performance, constitutes "forward-looking statements". These forward-looking statements may be identified by the use of forward-looking terminology, including the terms "aims", "ambition", "anticipates", "aspire", "believes", "continue", "could", "estimates", "expects", "guidance", "intends", "may", "mission", "outlook", "over the medium term", "plans", "predicts", "projects", "propositions", "seeks", "should", "strategy", "targets", "will" or "would" or, in each case, their negative or other variations or comparable terminology, or by discussions of strategy, plans, objectives, goals, future events or intentions. These forward-looking statements include all matters that are not historical facts. They appear in several places throughout this document and include statements regarding the intentions, beliefs or current expectations of the Directors concerning, among other things: the Group's results of operations, financial condition, prospects, growth, strategies, the industry in which the Group operates and the Group's approach to climate-related matters. Examples of forward-looking statements include financial targets and guidance which are contained in this document specifically with respect to; the return on tangible equity, solvency capital ratio, the Group's combined operating ratio, percentage targets for current-year contribution to operating profit, prior-year reserve releases, cost reductions, reduction in expense ratio, investment income yield, net realised and unrealised gains, capital expenditure and, risk appetite range; and targets, goals and plans relating to climate and the Group's approach and strategy in connection with climate-related risks and opportunities. By their nature, all forward-looking statements involve risk and uncertainties because they relate to events and depend on circumstances that may or may not occur in the future and/or are beyond the Group's control and/or they rely on assumptions that may or may not transpire to be correct. Forward-looking statements are not guaranteeing future performance.

The Group's actual results of operations, financial condition and the development of the business sector in which the Group operates may differ materially from those suggested by the forward-looking statements contained in this document, for example directly or indirectly as a result of, but not limited to:

- United Kingdom ("**UK**") domestic and global economic business conditions;
- the direct and indirect impacts and implications of the coronavirus Covid-19 pandemic on the economy, nationally and internationally, on the Group, its operations and prospects, and on the Group’s customers and their behaviours and expectations;
- the Trade and Cooperation Agreement between the UK and the European Union ("**EU**") regarding the terms, following the end of the Brexit transition period, of the trading relationships between the UK and the EU and its implementation, and any subsequent trading and other relationship arrangements between the UK and the EU and their implementation;
- the terms of trading and other relationships between the UK and other countries following Brexit;
- the impact of the FCA pricing practices report and the rules and regulations arising as a result of that report and of responses by insurers, customers and other third parties and of interpretations of such rules by any relevant regulatory authority;
- market-related risks such as fluctuations in interest rates, exchange rates and credit spreads;
- the policies and actions and/or new principles, rules and/or changes to, or changes to interpretations of principles, rules and/or regulations, of regulatory authorities and bodies (including changes made directly or indirectly as a result of Brexit or related to capital and solvency requirements or related to the Ogden discount rate or rates or made in response to the Covid-19 pandemic and its impact on the economy and customers) and changes to law and/or understandings of law and/or legal interpretation following the decisions and judgements of courts;
- the impact of competition, currency changes, inflation and deflation;
- the timing, impact and other uncertainties of future acquisitions, disposals, partnership arrangements, joint ventures or combinations within relevant industries; and
- the impact of tax and other legislation and other regulation and of regulator expectations, interventions, enforcements, fines and requirements and of court, arbitration, regulatory or ombudsman decisions, judgements and awards (including in any of the foregoing in connection with the Covid-19 pandemic) in the jurisdictions in which the Group and its affiliates operate.

The forward-looking statements contained in this document reflect knowledge and information available as of the date of preparation of this document. The Group and the Directors expressly disclaim any obligations or undertaking to update or revise publicly any forward-looking statements, whether because of new information, future events or otherwise, unless required to do so by applicable law or regulation. Nothing in this document constitutes or should be construed as a profit forecast.

In addition, even if the Group's actual results of operations, financial condition and the development of the business sector in which the Group operates are consistent with forward-looking statements contained in this document, those results or developments may not be indicative of results or developments in subsequent periods.

F.4 Glossary

Term	Definition and explanation
Actuarial best estimate (“**ABE**”)	The probability-weighted average of all future claims and cost scenarios. It is calculated using historical data, actuarial methods and judgement. A best estimate of reserves will therefore normally include no margin for optimism or, conversely, caution.
Adjusted solvency capital ratio	The ratio of Solvency II own funds to the solvency capital requirement, which excludes the Tier 2 subordinated debt which can first be called on 27 April 2022 from the Group's own funds.
Annual Incentive Plan (“**AIP**”)	This incentivises the performance of Executive Directors and employees over a one-year operating cycle. It focuses on the short to medium-term elements of the Group’s strategic aims.
Assets under management (“**AUM**”)	This represents all assets managed or administered by or on behalf of the Group, including those assets managed by third parties.
Available-for-sale (“**AFS**”) investment	Available-for-sale investments are non-derivative financial assets that designated as such, or are not classified as loans and receivables, held to maturity, or financial assets at fair value through profit or loss.
Capital	The funds invested in the Group, including funds invested by shareholders and Tier 1 notes in addition, subordinated loan capital in the Group’s balance sheet is classified as Tier 2 capital for Solvency II purposes.
Capital coverage ratio	The ratio of Solvency II own funds to the solvency capital requirement.
Direct Line Insurance Internal Capital Engine (“**DIICE**”)	DIICE is the calculation kernel in the IECM, where it is DIICE that calculates the solvency capital requirement.
Expenses incurred	Expenses incurred equal total expenses per the IFRS income statement less non-technical expenses plus claims handling expenses.
Financial Conduct Authority (“**FCA**”)	The independent body responsible for regulating the UK’s financial services industry.
Gross written premium	The total premiums from contracts that were incepted during the period.
Group	Direct Line Insurance Group plc and its subsidiaries
International Accounting Standards Board (“**IASB**”)	A not-for-profit public interest organisation that is overseen by a monitoring board of public authorities. It develops IFRS standards that aim to make worldwide markets transparent, accountable and efficient.
Incurred but not reported (“**IBNR**”)	Funds set aside to meet the cost of claims for accidents that have occurred but have not yet been reported to the Group. This includes an element of uplift on the value of claims reported.
In-force policies	The number of policies on a given date that are active, and against which the Group will pay, following a valid insurance claim.
Insurance liabilities	This comprises insurance claims reserves and claims handling provision, which the Group maintains to meet current and future claims.
Internal Economic Capital Model (“**IECM**”)	The IECM is an internal model as outlined by Article 112 of the Solvency II Directive.
Investment income yield	The income earned from the investment portfolio, recognised through the IFRS income statement during the period (excluding unrealised and realised gains and losses, impairments and fair value adjustments) divided by the average assets under management (“**AUM**”). The average AUM derives from the period’s opening and closing balances for the total Group. See Appendix A – Alternative performance measures – on page 251 of the Annual Report & Accounts 2021.
Investment return	The investment return earned from the investment portfolio, including unrealised and realised gains and losses, impairments, and fair value adjustments.
Investment return yield	The investment return divided by the average AUM. The average AUM derives from the period’s opening and closing balances. See Appendix A – Alternative performance measures – on page 251 of the Annual Report & Accounts 2021.
Long-Term Incentive Plan (“**LTIP**”)	Awards made as nil-cost options or conditional share awards, which vest to the extent that performance conditions are satisfied after a period of at least three years.
Malus	An arrangement that permits unvested remuneration awards to be forfeited, when the Company considers it appropriate.
Minimum capital requirement (”**MCR**”)	The minimum amount of capital that an insurer needs to hold to cover its risk under the Solvency II regulatory framework. If an insurer’s capital falls below the MCR then authorisation will be withdrawn by the regulator unless the insurer is able to meet the MCR within a short period of time.

Glossary continued

Term	Definition and explanation
Net earned premium	The element of gross earned premium less reinsurance premium ceded for the period where insurance cover has already been provided.
Net insurance claims	The cost of claims incurred in the period less any claims costs recovered under reinsurance contracts. It includes claims payments and movements in claims reserves.
Ogden discount rate	The discount rate set by the Lord Chancellor and used by courts to calculate lump sum awards in bodily injury cases.
Operating profit	The pre-tax profit that the Group's activities generate, including insurance and investment activity, but excluding finance costs, restructuring and one-off costs. Normalised operating profit is operating profit adjusted for weather and changes to the Ogden discount rate.
Own Risk and Solvency Assessment ("**ORSA**")	A forward-looking assessment of the Group's risks and associated capital requirements, over the business planning period.
Periodic payment order ("**PPO**")	These are claims payments as awarded under the Courts Act 2003. PPOs are used to settle large personal injury claims. They generally provide a lump-sum award plus inflation-linked annual payments to claimants who require long-term care.
Prudential Regulation Authority ("**PRA**")	The PRA is a part of the Bank of England. It is responsible for regulating and supervising insurers and financial institutions in the UK.
Reinsurance	Contractual arrangements where the Group transfers part or all of the accepted insurance risk to another insurer.
Reserves	Funds that have been set aside to meet outstanding insurance claims and IBNR.
Return on Tangible Equity ("**RoTE**")	This is adjusted profit after tax divided by the Group's average shareholders' equity, less goodwill and other intangible assets. Profit after tax is adjusted to exclude restructuring and one-off costs and to include Tier 1 coupon payments. It is stated after charging tax using the UK standard rate of 19% (2019: 19%). See Appendix A - Alternative performance measures – on page 252 of the Annual Report & Accounts 2021.
Solvency II	The capital adequacy regime for the European insurance industry, which became effective on 1 January 2016. It establishes capital requirements and risk management standards. It comprises three pillars: Pillar I, which sets out capital requirements for an insurer; Pillar II, which focuses on systems of governance; and Pillar III, which deals with disclosure requirements.
Solvency Capital Requirement ("**SCR**")	The SCR is the amount of capital the regulator requires an insurer to hold to meet the requirements under the Solvency II regulatory framework. The Group uses a partial internal model to determine SCR.
Underwriting result profit/(loss)	The profit or loss from operational activities, excluding investment return and other operating income. It is calculated as net earned premium less net insurance claims and total expenses, excluding restricting and other one-off costs.

Section G:

G. QUANTITATIVE REPORTING TEMPLATES

In this section:

G.1 SUMMARY OF QUANTITATIVE REPORTING TEMPLATES

The templates are provided as an appendix to this document. The Company is required to disclose the following templates as set out in the Commission Implementing Regulation (EU) 2015/2452 of 2 December 2015 laying down implementing technical standards with regard to the procedures, formats and templates of the solvency and financial condition report in accordance with Directive 2009/138/EC of the European Parliament and of the Council.

Entity	Template code	Template name
Group	S.02.01.02	Balance sheet
	S.05.01.02	Premiums, claims and expenses by line of business
	S.05.02.01	Premiums, claims and expenses by country
	S.22.01.22	Impact of long-term guarantees and transitional measures
	S.23.01.22	Own funds
	S.25.02.22	Solvency capital requirement – for groups using the standard formula and partial internal model
	S.32.01.22	Undertakings in the scope of the group
UKI	S.02.01.02	Balance sheet
	S.05.01.02	Premiums, claims and expenses by line of business
	S.05.02.01	Premiums, claims and expenses by country
	S.12.01.02	Life and Health SLT technical provisions
	S.17.01.02	Non-life technical provisions
	S.19.01.21	Non-life insurance claims
	S.22.01.21	Impact of long-term guarantees and transitional measures
	S.23.01.01	Own funds
	S.25.03.21	Solvency capital requirement – for undertakings on full internal models
	S.28.01.01	Minimum capital requirement – only life or only non-life insurance or reinsurance activity
CIC	S.02.01.02	Balance sheet
	S.05.01.02	Premiums, claims and expenses by line of business
	S.05.02.01	Premiums, claims and expenses by country
	S.12.01.02	Life and Health SLT technical provisions
	S.17.01.02	Non-life technical provisions
	S.19.01.21	Non-life insurance claims
	S.22.01.21	Impact of long term guarantees and transitional measures
	S.23.01.01	Own funds
	S.25.01.21	Solvency capital requirement – for undertakings on standard formula
	S.28.01.01	Minimum capital requirement – only life or only non-life insurance or reinsurance activity

G.2 DIRECT LINE INSURANCE GROUP PLC

General information

Undertaking name	**Direct Line Insurance Group plc**
Undertaking identification code	213800FF2R23ALJQOP04
Type of code of undertaking	LEI
Type of undertaking	Insurance holding company as defined in Article 212(1) (f) of Directive 2009/138/EC
Country of authorisation	GB
Language of reporting	EN
Reporting reference date	31 December 2021
Currency used for reporting	GBP
Accounting standards	IFRS
Method of calculation of the SCR	The Group uses a partial internal model
Matching adjustment	No use of matching adjustment
Volatility adjustment	Volatility adjustment is applied to the following lines of business: Motor vehicle liability insurance General liability insurance Annuities from non-life
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

S.02.01.02	Balance sheet
S.05.01.02	Premiums, claims and expenses by line of business
S.05.02.01	Premiums, claims and expenses by country
S.22.01.22	Impact of long-term guarantees and transitional measures
S.23.01.22	Own funds
S.25.02.22	Solvency capital requirement – for groups using the standard formula and partial internal model
S.32.01.22	Undertakings in the scope of the group

S.02.01.02

Balance sheet

(£'000)

		Solvency II value
		C0010
	Assets	
R0030	Intangible assets	
R0040	Deferred tax assets	179,392
R0050	Pension benefit surplus	12,071
R0060	Property, plant and equipment held for own use	178,348
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	5,329,793
R0080	Property (other than for own use)	316,950
R0090	Holdings in related undertakings, including participations	
R0100	Equities	6,103
R0110	Equities – listed	
R0120	Equities – unlisted	6,103
R0130	Bonds	4,177,950
R0140	Government bonds	49,581
R0150	Corporate bonds	4,128,369
R0160	Structured notes	
R0170	Collateralised securities	
R0180	Collective investments undertakings	792,867
R0190	Derivatives	35,923
R0200	Deposits other than cash equivalents	
R0210	Other investments	
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	456,040
R0240	Loans on policies	
R0250	Loans and mortgages to individuals	
R0260	Other loans and mortgages	456,040
R0270	Reinsurance recoverables from:	1,170,350
R0280	Non-life and health similar to non-life	787,785
R0290	Non-life excluding health	787,785
R0300	Health similar to non-life	
R0310	Life and health similar to life, excluding health and index-linked and unit-linked	382,565
R0320	Health similar to life	
R0330	Life excluding health and index-linked and unit-linked	382,565
R0340	Life index-linked and unit-linked	
R0350	Deposits to cedants	
R0360	Insurance and intermediaries receivables	39,432
R0370	Reinsurance receivables	36,800
R0380	Receivables (trade, not insurance)	107,050
R0390	Own shares (held directly)	37,518
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	
R0410	Cash and cash equivalents	162,823
R0420	Any other assets, not elsewhere shown	38,105
R0500	**Total assets**	**7,747,722**

S.02.01.02 continued

Balance sheet

(£'000)

		Solvency II value
		C0010
	Liabilities	
R0510	Technical provisions – non-life	3,860,489
R0520	Technical provisions – non-life (excluding health)	3,854,844
R0530	TP calculated as a whole	
R0540	Best estimate	3,692,261
R0550	Risk margin	162,583
R0560	Technical provisions – health (similar to non-life)	5,645
R0570	TP calculated as a whole	
R0580	Best estimate	4,957
R0590	Risk margin	688
R0600	Technical provisions – life (excluding index-linked and unit-linked)	723,347
R0610	Technical provisions – health (similar to life)	
R0620	TP calculated as a whole	
R0630	Best estimate	
R0640	Risk margin	
R0650	Technical provisions – life (excluding health and index-linked and unit-linked)	723,347
R0660	TP calculated as a whole	
R0670	Best estimate	678,616
R0680	Risk margin	44,731
R0690	Technical provisions – index-linked and unit-linked	
R0700	TP calculated as a whole	
R0710	Best estimate	
R0720	Risk margin	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	96,359
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	
R0790	Derivatives	19,457
R0800	Debts owed to credit institutions	59,216
R0810	Financial liabilities other than debts owed to credit institutions	84,212
R0820	Insurance and intermediaries payables	3,081
R0830	Reinsurance payables	4,070
R0840	Payables (trade, not insurance)	144,716
R0850	Subordinated liabilities	509,328
R0860	Subordinated liabilities not in BOF	
R0870	Subordinated liabilities in BOF	509,328
R0880	Any other liabilities, not elsewhere shown	
R0900	**Total liabilities**	**5,504,275**
R1000	**Excess of assets over liabilities**	**2,243,447**

S.05.01.02

Premiums, claims and expenses by line of business

Non-life

(£'000)

		Line of business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)				
		Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Fire and other damage to property insurance	General liability insurance
		C0020	C0040	C0050	C0070	C0080
	Premiums written					
R0110	Gross – direct business	4,507	1,167,395	562,733	876,335	107,760
R0120	Gross – proportional reinsurance accepted					
R0130	Gross – non-proportional reinsurance accepted					
R0140	Reinsurers' share		117,016		62,014	5,613
R0200	Net	4,507	1,050,379	562,733	814,321	102,147
	Premiums earned					
R0210	Gross – direct business	4,507	1,190,710	564,060	857,155	105,636
R0220	Gross – proportional reinsurance accepted					
R0230	Gross – non-proportional reinsurance accepted					
R0240	Reinsurers' share		141,560		61,853	5,468
R0300	Net	4,507	1,049,150	564,060	795,302	100,168
	Claims incurred					
R0310	Gross – direct business	856	862,140	265,445	404,534	15,751
R0320	Gross – proportional reinsurance accepted					
R0330	Gross – non-proportional reinsurance accepted					
R0340	Reinsurers' share		172,070		15,793	(192)
R0400	Net	856	690,070	265,445	388,741	15,943
	Changes in other technical provisions					
R0410	Gross – direct business					
R0420	Gross – proportional reinsurance accepted					
R0430	Gross – non-proportional reinsurance accepted					
R0440	Reinsurers' share					
R0500	Net					
R0550	**Expenses incurred**	3,860	376,168	196,164	328,966	41,417
R1200	**Other expenses**					
R1300	**Total expenses**					

S.05.01.02 continued

Premiums, claims and expenses by line of business
Non-life
(£'000)

		Line of business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)			Total
		Legal expenses insurance	Assistance	Miscellaneous financial loss	
		C0050	C0070	C0080	C0200
	Premiums written				
R0110	Gross – direct business	75,493	271,882	105,476	3,171,580
R0120	Gross – proportional reinsurance accepted				
R0130	Gross – non-proportional reinsurance accepted				
R0140	Reinsurers' share		663	1,085	186,391
R0200	Net	75,493	271,219	104,391	2,985,190
	Premiums earned				
R0210	Gross – direct business	76,360	264,520	105,085	3,168,033
R0220	Gross – proportional reinsurance accepted				
R0230	Gross – non-proportional reinsurance accepted				
R0240	Reinsurers' share		663	1,030	210,575
R0300	Net	76,360	263,857	104,055	2,957,459
	Claims incurred				
R0310	Gross – direct business	15,197	66,179	82,030	1,712,132
R0320	Gross – proportional reinsurance accepted				
R0330	Gross – non-proportional reinsurance accepted				
R0340	Reinsurers' share	463	(8,558)	12,151	191,727
R0400	Net	14,734	74,737	69,879	1,520,405
	Changes in other technical provisions				
R0410	Gross – direct business				
R0420	Gross – proportional reinsurance accepted				
R0430	Gross – non-proportional reinsurance accepted				
R0440	Reinsurers' share				
R0500	Net				
R0550	**Expenses incurred**	15,911	135,761	26,608	**1,124,855**
R1200	**Other expenses**				**101,485**
R1300	**Total expenses**				**1,226,340**

S.05.01.02 continued

Premiums, claims and expenses by line of business
Life
(£'000)

		Line of business for: life insurance obligations	
		Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Total
		C0260	C0300
	Premiums written		
R1410	Gross		
R1420	Reinsurers' share		
R1500	Net		
	Premiums earned		
R1510	Gross		
R1520	Reinsurers' share		
R1600	Net		
	Claims incurred		
R1610	Gross	14,028	14,028
R1620	Reinsurers' share	4,867	4,867
R1700	Net	9,161	9,161
	Changes in other technical provisions		
R1710	Gross		
R1720	Reinsurers' share		
R1800	Net		
R1900	**Expenses incurred**	137	**137**
R2500	**Other expenses**		
R2600	**Total expenses**		**137**

G.2 DIRECT LINE INSURANCE GROUP PLC continued

S.05.02.01
Premiums, claims and expenses by country

Non-life

(£’000)

		C0010	C0020	C0070
		Home country	Top 5 countries (by amount of gross premiums written) – non-life obligations	**Total top 5 and home country**
R0010			IRL	
		C0080	C0090	C0140
	Premiums written			
R0110	Gross – direct business	3,171,415	166	3,171,581
R0120	Gross – proportional reinsurance accepted			
R0130	Gross – non-proportional reinsurance accepted			
R0140	Reinsurers' share	186,391		186,391
R0200	Net	2,985,024	166	2,985,190
	Premiums earned			
R0210	Gross – direct business	3,167,867	166	3,168,033
R0220	Gross – proportional reinsurance accepted			
R0230	Gross – non-proportional reinsurance accepted			
R0240	Reinsurers' share	210,574		210,574
R0300	Net	2,957,294	166	2,957,460
	Claims incurred			
R0310	Gross – direct business	1,712,123	9	1,712,132
R0320	Gross – proportional reinsurance accepted			
R0330	Gross – non-proportional reinsurance accepted			
R0340	Reinsurers' share	191,727		191,727
R0400	Net	1,520,396	9	1,520,405
	Changes in other technical provisions			
R0410	Gross – direct business			
R0420	Gross – proportional reinsurance accepted			
R0430	Gross – non-proportional reinsurance accepted			
R0440	Reinsurers' share			
R0500	Net			
R0550	**Expenses incurred**	1,124,751	104	**1,124,855**
R1200	**Other expenses**			**101,485**
R1300	**Total expenses**			**1,226,340**

S.05.02.01 continued
Premiums, claims and expenses by country

Life

(£’000)

		C0150	C0160	C0210
		Home country	Top 5 countries (by amount of gross premiums written) – life obligations	**Total top 5 and home country**
R1400			IRL	
		C0220	C0230	C0280
	Premiums written			
R1410	Gross			
R1420	Reinsurers' share			
R1500	Net			
	Premiums earned			
R1510	Gross			
R1520	Reinsurers' share			
R1600	Net			
	Claims incurred			
R1610	Gross	14,028		14,028
R1620	Reinsurers' share	4,867		4,867
R1700	Net	9,161		9,161
	Changes in other technical provisions			
R1710	Gross			
R1720	Reinsurers' share			
R1800	Net			
R1900	**Expenses incurred**	137		**137**
R2500	**Other expenses**			
R2600	**Total expenses**			**137**

S.22.01.22

Impact of long-term guarantees and transitional measures (£'000)

		Amount with long-term guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
R0010	Technical provisions	4,583,836			37,016	
R0020	Basic own funds	2,415,809			(12,291)	
R0050	Eligible own funds to meet Solvency Capital Requirement	2,384,782			(19,850)	
R0090	Solvency Capital Requirement	1,354,169			(126)	

S.23.01.22
Own funds
(£'000)

		Total	Tier 1 – unrestricted	Tier 1 – restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
	Basic own funds before deduction for participations in other financial sector					
R0010	Ordinary share capital (gross of own shares)	145,168	145,168			
R0020	Non-available called but not paid in ordinary share capital at group level					
R0030	Share premium account related to ordinary share capital					
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type Undertakings					
R0050	Subordinated mutual member accounts					
R0060	Non-available subordinated mutual member accounts at group level					
R0070	Surplus funds					
R0080	Non-available surplus funds at group level					
R0090	Preference shares					
R0100	Non-available preference shares at group level					
R0110	Share premium account related to preference shares					
R0120	Non-available share premium account related to preference shares at group level					
R0130	Reconciliation reserve	1,220,990	1,220,990			
R0140	Subordinated liabilities	509,328			509,328	
R0150	Non-available subordinated liabilities at group level					
R0160	An amount equal to the value of net deferred tax assets	179,392				179,392
R0170	The amount equal to the value of net deferred tax assets not available at the group level					
R0180	Other items approved by supervisory authority as basic own funds not specified above	360,931		360,931		
R0190	Non-available own funds related to other own funds items approved by supervisory authority					
R0200	Minority interest (if not reported as part of a specific own fund item)					
R0210	Non-available minority interests at group level					
	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					
R0220	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					
	Deductions					
R0230	Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities					
R0240	whereof deducted according to Article 228 of the Directive 2009/138/EC					
R0250	Deductions for participations where there is non-availability of information (Article 229)					
R0260	Deduction for participations included by using D&A when a combination of methods is used					
R0270	Total of non-available own fund items					
R0280	**Total deductions**					
R0290	**Total basic own funds after deductions**	2,415,809	1,366,158	360,931	509,328	179,392

S.23.01.22 continued
Own funds
(£'000)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand					
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual-type undertakings, callable on demand					
R0320	Unpaid and uncalled preference shares callable on demand					
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC					
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC					
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC					
R0370	Supplementary members – calls other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC					
R0380	Non-available ancillary own funds at group level					
R0390	Other ancillary own funds					
R0400	**Total ancillary own funds**					
	Own funds of other financial sectors					
R0410	Reconciliation reserve					
R0420	Institutions for occupational retirement provision					
R0430	Non regulated entities carrying out financial activities					
R0440	Total own funds of other financial sectors					
	Own funds when using the D&A, exclusively or in combination of method 1					
R0450	Own funds aggregated when using the D&A and combination of method					
R0460	Own funds aggregated when using the D&A and combination of method net of IGT					
R0520	Total available own funds to meet the consolidated Group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	2,415,809	1,366,158	360,931	509,328	179,392
R0530	Total available own funds to meet the minimum consolidated Group SCR	2,236,417	1,366,158	360,931	509,328	
R0560	Total eligible own funds to meet the consolidated Group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	2,384,782	1,366,158	341,540	528,719	148,365
R0570	Total eligible own funds to meet the minimum consolidated Group SCR	1,814,307	1,366,158	341,540	106,609	

S.23.01.22 continued
Own funds
(£'000)

		Total	Tier 1 – unrestricted	Tier 1 – restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
R0610	**Minimum consolidated Group SCR**	533,047				
R0650	**Ratio of eligible own funds to minimum consolidated Group SCR**	3.4037				
R0660	**Total eligible own funds to meet the Group SCR (including own funds from other financial sector and from the undertakings (included via D&A)**	2,384,782	1,366,158	341,540	528,719	148,365
R0680	**Group SCR**	1,354,169				
R0690	**Ratio of eligible own funds to Group SCR including other financial sectors and the undertakings included via D&A**	1.7611				

		C0060
	Reconciliation reserve	
R0700	Excess of assets over liabilities	2,243,447
R0710	Own shares (held directly and indirectly)	37,518
R0720	Foreseeable dividends, distributions and charges	299,448
R0730	Other basic own fund items	685,491
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring-fenced funds	
R0750	Other non-available own funds	
R0760	**Reconciliation reserve before deduction for participations in other financial sector**	1,220,990
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) — life business	
R0780	Expected profits included in future premiums (EPIFP) — non-life business	140,360
R0790	**Total expected profits included in future premiums (EPIFP)**	140,360

Note that the expected profit in future premiums is a Solvency II specific measure of lapse risk and not a measure of overall profitability of the business. Please see C.4 Liquidity risk for details.

S.25.02.22

Solvency Capital Requirement –for groups using the standard formula and partial internal model

(£'000)

Unique number of component	Components description	Calculation of the Solvency Capital Requirement	Amount modelled	USP	Simplifications
C0010	C0020	C0030	C0070	C0080	C0090
10301I	Other interest rate risk – interest rate risk (assets)	209,761	209,761		
10302I	Other interest rate risk – interest rate risk (liabilities)	189,692	189,692		
10399I	Diversification within other interest rate risk	(269,055)	(269,055)		
10400I	Equity risk				
10600I	Property risk	56,369	56,369		
10701I	Spread risk	428,828	428,828		
10702I	Credit risk (asset)	166,389	166,389		
10799I	Diversification within spread and credit risk (asset)	(73,673)	(73,673)		
10800I	Concentration risk				
10900I	Currency risk				
19900I	Diversification within market risk	(157,243)	(157,243)		
20300I	Other counterparty risk	66,531	66,531		
50100I	Premium risk	612,919	612,919		
50200I	Reserve risk	494,859	494,859		
50300I	Non-life catastrophe risk	694,816	694,816		
59900I	Diversification within non-life underwriting risk	(637,698)	(637,698)		
70100I	Operational risk	247,885	247,885		
80100I	Other risks	41,924	41,924		
80300I	Loss-absorbing capacity of deferred tax	(72,321)	(72,321)		
80400I	Other adjustments				

S.25.02.22 continued

Solvency Capital Requirement – for groups using the standard formula and partial internal model

(£'000)

		C0100
	Calculation of Solvency Capital Requirement	
R0110	Total undiversified components	1,999,983
R0060	Diversification	(695,305)
R0160	Capital requirement for business operated in accordance with Article 4 of Directive 2003/41/EC	
R0200	**Solvency Capital Requirement excluding capital add-on**	1,304,678
R0210	Capital add-ons already set	
R0220	**Solvency Capital Requirement for undertakings under consolidated method**	1,354,169
	Other information on SCR	
R0300	Amount/estimate of the overall loss-absorbing capacity of technical provisions	
R0310	Amount/estimate of the overall loss-absorbing capacity of deferred taxes	(72,321)
R0400	Capital requirement for duration-based equity risk sub-module	
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Article 4 of Directive 2003/41/EC (transitional)	
R0430	Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	
R0440	Diversification effects due to RFF nSCR aggregation for Article 304	
R0470	Minimum consolidated Group Solvency Capital Requirement	533,047
	Information on other entities	
R0500	Capital requirement for other financial sectors (non-insurance capital requirements)	
R0510	Capital requirement for other financial sectors (non-insurance capital requirements) – credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies	
R0520	Capital requirement for other financial sectors (non-insurance capital requirements) – institutions for occupational retirement provisions	
R0530	Capital requirement for other financial sectors (non-insurance capital requirements) – capital requirement for non-regulated entities carrying out financial activities	
R0540	Capital requirement for non-controlled participation requirements	
R0550	Capital requirement for residual undertakings	49,491
	Overall SCR	
R0560	SCR for undertakings included via D&A	
R0570	**Solvency Capital Requirement**	1,354,169

G.2 DIRECT LINE INSURANCE GROUP PLC continued

S.32.01.22

Undertakings in the scope of the group

								Criteria of influence						Inclusion in the scope of group supervision		Group solvency calculation
Country	Identification code of undertaking	Type of code of the ID of the undertaking	Legal name of the undertaking	Type of undertaking	Legal form	Category (mutual / non mutual)	Supervisory authority	% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	Yes/ no	Date of decision if Article 214 is applied	Method used and under method 1, treatment of the undertaking
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0180	C0190	C0200	C0210	C0220	C0230	C02	C0250	C0260
GB	213800FF2R23ALJQOP04	LEI	Direct Line Insurance Group plc	5	Company limited by shares	2								1		1
GB	549300Z5UV7Z65LTYJ43	LEI	U K Insurance Limited	2	Company limited by shares	2	PRA	100	100	100		1	100	1		1
GB	2138007B4PLYNW611O59	LEI	Churchill Insurance Company Limited	2	Company limited by shares	2	PRA	100	100	100		1	100	1		1
GB	2138008ZP4216R8AZA45	LEI	U K Insurance Business Solutions Limited	10	Company limited by shares	2	FCA	100	100	100		1	100	1		1
GB	21380093VNH85CCTZM58	LEI	National Breakdown Recovery Club Limited	99	Company limited by shares	2		100	100	100		1	100	1		3
GB	213800AEN577VPYUWS88	LEI	DLG Pension Trustee Limited	99	Company limited by shares	2		100	100	100		1	100	1		3
GB	213800C229CRIQN7Q486	LEI	Direct Line Insurance Limited	99	Company limited by shares	2		100	100	100		1	100	1		3
GB	213800ECJ98JKW8XPO58	LEI	DL Insurance Services Limited	10	Company limited by shares	2		100	100	100		1	100	1		1
GB	213800FUQURSPS5NPZ53	LEI	DLG Legal Services Limited	99	Company limited by shares	2		100	100	100		1	100	1		3
GB	213800G23ZAHTDQ7JS64	LEI	UKI Life Assurance Services Limited	99	Company limited by shares	2		100	100	100		1	100	1		3
GB	213800GGXWCI3AQUP330	LEI	UK Assistance Accident Repair Centres Limited	10	Company limited by shares	2		100	100	100		1	100	1		1
GB	213800JGMYQA8ZU3KF17	LEI	Farmweb Limited	99	Company limited by shares	2		100	100	100		1	100	1		1
GB	213800L4GCDT4J556J73	LEI	Nationwide Breakdown Recovery Services Limited	99	Company limited by shares	2		100	100	100		1	100	1		3
GB	213800LF9K2SZXPFQY79	LEI	UK Assistance Limited	99	Company limited by shares	2		100	100	100		1	100	1		3
JE	213800MEX738WOUMSC13	LEI	10-15 Livery Street, Birmingham UK Limited	99	Company limited by shares	2		100	100	100		1	100	1		1
GB	213800MFLWGG2N8OVA34	LEI	Green Flag Limited	10	Company limited by shares	2		100	100	100		1	100	1		1
GB	213800MN5P5DE45U9W69	LEI	The National Insurance and Guarantee Corporation Limited	99	Company limited by shares	2		100	100	100		1	100	1		3
GB	213800MRCD2SJWT8EB37	LEI	Inter Group Insurance Services Limited	10	Company limited by shares	2		100	100	100		1	100	1		1
GB	213800R3C7Z1Q73IWN57	LEI	Green Flag Group Limited	99	Company limited by shares	2		100	100	100		1	100	1		1
GB	213800RFERZVGSMGH748	LEI	Finsure Premium Finance Limited	10	Company limited by shares	2		100	100	100		1	100	1		1
GB	213800RSEDIUJJHXTF77	LEI	Direct Line Group Limited	99	Company limited by shares	2		100	100	100		1	100	1		1
GB	213800S4FRZFA1QH3Y58	LEI	Green Flag Holdings Limited	99	Company limited by shares	2		100	100	100		1	100	1		1
IN	213800YY63HNK4VO2G95	LEI	DL Support Services India Private Limited	10	Company limited by shares	2		100	100	100		1	100	1		1
GB	213800ZJIPTGNL7FP828	LEI	Intergroup Assistance Services Limited	10	Company limited by shares	2		100	100	100		1	100	1		1
GB	2138007NUHFZPO3H5N36	LEI	Brolly UK Technology Limited	99	Company limited by shares	2		100	100	100		1	100	1		1
JE	2138002C5L78GH6YJI82	LEI	Direct Line Insurance Group Employee Benefit Trust	99	Trust	2			100			1	100	1		1
GB	2138007UQ448Q4BRW767	LEI	DLIG 2012 Share Incentive Plan	99	Trust	2			100			1	100	1		1

G.3 U K INSURANCE LIMITED

General information

Undertaking name	**U K Insurance Limited**
Undertaking identification code	549300Z5UV7Z65LTYJ43
Type of code of undertaking	LEI
Type of undertaking	Non-life insurance undertakings
Country of authorisation	GB
Language of reporting	EN
Reporting reference date	31 December 2021
Currency used for reporting	GBP
Accounting standards	The undertaking is using IFRS
Method of calculation of the SCR	Full internal model
Matching adjustment	No use of matching adjustment
Volatility adjustment	Volatility adjustment is applied to the following lines of business: Motor vehicle liability insurance General liability insurance Annuities from non-life
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

S.02.01.02	Balance sheet
S.05.01.02	Premiums, claims and expenses by line of business
S.05.02.01	Premiums, claims and expenses by country
S.12.01.02	Life and health SLT technical provisions
S.17.01.02	Non-life technical provisions
S.19.01.21	Non-life insurance claims
S.22.01.21	Impact of long-term guarantees and transitional measures
S.23.01.01	Own funds
S.25.03.21	Solvency capital requirement – for undertakings on full internal models
S.28.01.01	Minimum capital requirement – only life or only non-life insurance or reinsurance activity

S.02.01.02

Balance sheet

(£'000)

		Solvency II value
		C0010
	Assets	
R0030	Intangible assets	
R0040	Deferred tax assets	29,338
R0050	Pension benefit surplus	
R0060	Property, plant and equipment held for own use	58,808
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	5,069,316
R0080	Property (other than for own use)	316,950
R0090	Holdings in related undertakings, including participations	14,088
R0100	Equities	
R0110	Equities – listed	
R0120	Equities – unlisted	
R0130	Bonds	4,132,737
R0140	Government bonds	49,581
R0150	Corporate bonds	4,083,156
R0160	Structured notes	
R0170	Collateralised securities	
R0180	Collective investments undertakings	569,637
R0190	Derivatives	35,904
R0200	Deposits other than cash equivalents	
R0210	Other investments	
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	456,040
R0240	Loans on policies	
R0250	Loans and mortgages to individuals	
R0260	Other loans and mortgages	456,040
R0270	Reinsurance recoverables from:	1,144,841
R0280	Non-life and health similar to non-life	787,785
R0290	Non-life excluding health	787,785
R0300	Health similar to non-life	
R0310	Life and health similar to life, excluding health and index-linked and unit-linked	357,056
R0320	Health similar to life	
R0330	Life excluding health and index-linked and unit-linked	357,056
R0340	Life index-linked and unit-linked	
R0350	Deposits to cedants	
R0360	Insurance and intermediaries receivables	39,422
R0370	Reinsurance receivables	36,780
R0380	Receivables (trade, not insurance)	53,017
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	
R0410	Cash and cash equivalents	153,561
R0420	Any other assets, not elsewhere shown	
R0500	**Total assets**	**7,041,123**

S.02.01.02 continued

Balance sheet

(£'000)

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions – non-life	3,860,540
R0520	Technical provisions – non-life (excluding health)	3,854,895
R0530	TP calculated as a whole	
R0540	Best estimate	3,692,312
R0550	Risk margin	162,583
R0560	Technical provisions – health (similar to non-life)	5,645
R0570	TP calculated as a whole	
R0580	Best estimate	4,957
R0590	Risk margin	688
R0600	Technical provisions – life (excluding index-linked and unit-linked)	693,429
R0610	Technical provisions – health (similar to life)	
R0620	TP calculated as a whole	
R0630	Best estimate	
R0640	Risk margin	
R0650	Technical provisions – life (excluding health and index-linked and unit-linked)	693,429
R0660	TP calculated as a whole	
R0670	Best estimate	649,262
R0680	Risk margin	44,167
R0690	Technical provisions – index-linked and unit-linked	
R0700	TP calculated as a whole	
R0710	Best estimate	
R0720	Risk margin	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	50,003
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	
R0790	Derivatives	19,230
R0800	Debts owed to credit institutions	51,539
R0810	Financial liabilities other than debts owed to credit institutions	153,006
R0820	Insurance and intermediaries payables	2,059
R0830	Reinsurance payables	4,070
R0840	Payables (trade, not insurance)	25,864
R0850	Subordinated liabilities	251,876
R0860	Subordinated liabilities not in BOF	
R0870	Subordinated liabilities in BOF	251,876
R0880	Any other liabilities, not elsewhere shown	
R0900	**Total liabilities**	**5,111,616**
R1000	**Excess of assets over liabilities**	**1,929,507**

S.05.01.02

Premiums, claims and expenses by line of business

Non-life

(£'000)

		Line of business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)				
		Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Fire and other damage to property insurance	General liability insurance
		C0020	C0040	C0050	C0070	C0080
	Premiums written					
R0110	Gross – direct business	4,507	1,167,395	562,733	876,335	107,760
R0120	Gross – proportional reinsurance accepted					
R0130	Gross – non-proportional reinsurance accepted					
R0140	Reinsurers' share		117,016		62,014	5,613
R0200	Net	4,507	1,050,379	562,733	814,321	102,147
	Premiums earned					
R0210	Gross – direct business	4,507	1,190,710	564,060	857,155	105,636
R0220	Gross – proportional reinsurance accepted					
R0230	Gross – non-proportional reinsurance accepted					
R0240	Reinsurers' share		141,560		61,853	5,468
R0300	Net	4,507	1,049,150	564,060	795,302	100,168
	Claims incurred					
R0310	Gross – direct business	856	862,140	372,025	404,534	15,751
R0320	Gross – proportional reinsurance accepted		(27)			
R0330	Gross – non-proportional reinsurance accepted					
R0340	Reinsurers' share		172,070		15,793	(192)
R0400	Net	856	690,043	372,025	388,741	15,943
	Changes in other technical provisions					
R0410	Gross – direct business					
R0420	Gross – proportional reinsurance accepted					
R0430	Gross – non-proportional reinsurance accepted					
R0440	Reinsurers' share					
R0500	Net					
R0550	**Expenses incurred**	3,858	374,676	195,777	328,705	41,269
R1200	**Other expenses**					
R1300	**Total expenses**					

S.05.01.02 continued
Premiums, claims and expenses by line of business
Non-life
(£'000)

		Line of business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)			Total
		Legal expenses insurance	Assistance	Miscellaneous financial loss	
		C0100	C0110	C0120	C0200
	Premiums written				
R0110	Gross – direct business	75,493	271,882	105,476	3,171,581
R0120	Gross – proportional reinsurance accepted				
R0130	Gross – non-proportional reinsurance accepted				
R0140	Reinsurers' share		663	1,085	186,391
R0200	Net	75,493	271,219	104,391	2,985,190
	Premiums earned				
R0210	Gross – direct business	76,360	264,520	105,085	3,168,033
R0220	Gross – proportional reinsurance accepted				
R0230	Gross – non-proportional reinsurance accepted				
R0240	Reinsurers' share		663	1,030	210,574
R0300	Net	76,360	263,857	104,055	2,957,459
	Claims incurred				
R0310	Gross – direct business	15,197	66,191	82,030	1,818,724
R0320	Gross – proportional reinsurance accepted				(27)
R0330	Gross – non-proportional reinsurance accepted				
R0340	Reinsurers' share	463	(8,558)	12,151	191,727
R0400	Net	14,734	74,749	69,879	1,626,970
	Changes in other technical provisions				
R0410	Gross – direct business				
R0420	Gross – proportional reinsurance accepted				
R0430	Gross – non-proportional reinsurance accepted				
R0440	Reinsurers' share				
R0500	Net				
R0550	**Expenses incurred**	15,812	134,379	26,451	**1,120,927**
R1200	**Other expenses**				**102,371**
R1300	**Total expenses**				**1,223,298**

S.05.02.01
Premiums, claims and expenses by country
Life
(£'000)

		Line of business for: life insurance obligations	
		Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Total
		C0260	C0300
	Premiums written		
R1410	Gross		
R1420	Reinsurers' share		
R1500	Net		
	Premiums earned		
R1510	Gross		
R1520	Reinsurers' share		
R1600	Net		
	Claims incurred		
R1610	Gross	13,999	13,999
R1620	Reinsurers' share	4,120	4,120
R1700	Net	9,879	9,879
	Changes in other technical provisions		
R1710	Gross		
R1720	Reinsurers' share		
R1800	Net		
R1900	**Expenses incurred**		
R2500	**Other expenses**		
R2600	**Total expenses**		

S.05.02.01 continued
Premiums, claims and expenses by country
Non-life
(£'000)

		C0010	C0020	C0070
		Home country	Top 5 countries (by amount of gross premiums written) – non-life obligations	Total top 5 and home country
R0010			IRL	
		C0080	C0090	C0140
	Premiums written			
R0110	Gross – direct business	3,171,415	166	3,171,581
R0120	Gross – proportional reinsurance accepted			
R0130	Gross – non-proportional reinsurance accepted			
R0140	Reinsurers' share	186,391		186,391
R0200	Net	2,985,024	166	2,985,190
	Premiums earned			
R0210	Gross – direct business	3,167,867	166	3,168,033
R0220	Gross – proportional reinsurance accepted			
R0230	Gross – non-proportional reinsurance accepted			
R0240	Reinsurers' share	210,574		210,574
R0300	Net	2,957,293	166	2,957,459
	Claims incurred			
R0310	Gross – direct business	1,818,715	9	1,818,724
R0320	Gross – proportional reinsurance accepted	(27)		(27)
R0330	Gross – non-proportional reinsurance accepted			
R0340	Reinsurers' share	191,727		191,727
R0400	Net	1,626,961	9	1,626,970
	Changes in other technical provisions			
R0410	Gross – direct business			
R0420	Gross – proportional reinsurance accepted			
R0430	Gross – non-proportional reinsurance accepted			
R0440	Reinsurers' share			
R0500	Net			
R0550	**Expenses incurred**	1,120,823	104	**1,120,927**
R1200	**Other expenses**			**102,371**
R1300	**Total expenses**			**1,223,298**

S.05.02.01 continued
Premiums, claims and expenses by country
Life
(£'000)

		C0150	C0160	C0210
		Home country	Top 5 countries (by amount of gross premiums written) – life obligations	**Total top 5 and home country**
R1400			IRL	
		C0220	C0230	C0280
	Premiums written			
R1410	Gross			
R1420	Reinsurers' share			
R1500	Net			
	Premiums earned			
R1510	Gross			
R1520	Reinsurers' share			
R1600	Net			
	Claims incurred			
R1610	Gross	13,999		13,999
R1620	Reinsurers' share	4,120		4,120
R1700	Net	9,879		9,879
	Changes in other technical provisions			
R1710	Gross			
R1720	Reinsurers' share			
R1800	Net			
R1900	**Expenses incurred**			
R2500	**Other expenses**			
R2600	**Total expenses**			

S.12.01.02

Life and Health SLT technical provisions

(£'000)

		Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	**Total (life other than health insurance, including unit-linked)**
		C0090	C0150
R0010	**Technical provisions calculated as a whole**		
R0020	Total recoverables from reinsurance / SPV and Finite Re 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		
R0030	**Gross best estimate**	649,262	649,262
R0080	Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default	357,056	357,056
R0090	Best estimate minus recoverables from reinsurance / SPV and Finite Re – total	292,206	292,206
R0100	**Risk margin**	44,167	44,167
	Amount of the transitional on technical provisions		
R0110	Technical provisions calculated as a whole		
R0120	Best estimate		
R0130	Risk margin		
R0200	**Technical provisions – total**	**693,429**	**693,429**

S.17.01.02
Non-life technical provisions
(£'000)

		Direct business and accepted proportional reinsurance				
		Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Fire and other damage to property insurance	General liability insurance
		C0030	C0050	C0060	C0080	C0090
R0010	**Technical provisions calculated as a whole**					
R0050	Total recoverables from reinsurance / SPV and Finite Re 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	142	518,829	231,494	80,989	(88,877)
R0140	Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default		63,952		18,140	466
R0150	Net best estimate of premium provisions	142	454,877	231,494	62,849	(89,343)
	Claims provisions					
R0160	Gross	4,815	2,135,617	(40,010)	460,683	222,519
R0240	Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default		662,501		32,933	8,756
R0250	Net best estimate of claims provisions	4,815	1,473,116	(40,010)	427,750	213,763
R0260	**Total best estimate – gross**	4,957	2,654,446	191,484	541,672	133,642
R0270	**Total best estimate – net**	4,957	1,927,993	191,484	490,599	124,420
R0280	**Risk margin**	688	64,126	4,134	47,804	40,262
	Amount of the transitional on technical provisions					
R0290	Technical provisions calculated as a whole					
R0300	Best estimate					
R0310	Risk margin					
	Technical provisions – total					
R0320	Technical provisions – total	5,645	2,718,572	195,618	589,476	173,904
R0330	Recoverable from reinsurance contract / SPV and Finite Re after the adjustment for expected losses due to counterparty default – total		726,453		51,073	9,222
R0340	Technical provisions minus recoverables from reinsurance / SPV and Finite Re – total	5,645	1,992,119	195,618	538,403	164,682

S.17.01.02 continued
Non-life technical provisions
(£'000)

		Direct business and accepted proportional reinsurance			Total non-life obligation
		Legal expenses insurance	Assistance	Miscellaneous financial loss	
		C0110	C0120	C0130	C0180
R0010	**Technical provisions calculated as a whole**				
R0050	Total recoverables from reinsurance / SPV and Finite Re 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	(2,334)	10,744	(19,271)	731,716
R0140	Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default			392	82,950
R0150	Net best estimate of premium provisions	(2,334)	10,744	(19,663)	648,766
	Claims provisions				
R0160	Gross	32,653	117,500	31,776	2,965,553
R0240	Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default		(66)	711	704,835
R0250	Net best estimate of claims provisions	32,653	117,566	31,065	2,260,718
R0260	**Total best estimate – gross**	30,319	128,244	12,505	3,697,269
R0270	**Total best estimate – net**	30,319	128,310	11,402	2,909,484
R0280	**Risk margin**	925	3,923	1,409	163,271
	Amount of the transitional on technical provisions				
R0290	Technical provisions calculated as a whole				
R0300	Best estimate				
R0310	Risk margin				
	Technical provisions – total				
R0320	Technical provisions – total	31,244	132,167	13,914	3,860,540
R0330	Recoverable from reinsurance contract / SPV and Finite Re after the adjustment for expected losses due to counterparty default – total		(66)	1,103	787,785
R0340	Technical provisions minus recoverables from reinsurance / SPV and Finite Re – total	31,244	132,233	12,811	3,072,755

G.3 U K INSURANCE LIMITED continued

S.19.01.21

Non-life insurance claims

(£'000)

Z0010 **Accident year / underwriting year** | **Accident year**

Gross claims paid (non-cumulative)

(absolute amount)

						Development year								
	Year	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10 & +**	**In current year**	**Sum of years (cumulative)**
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
R0100	Prior											14,283	14,283	14,283
R0160	N-9	1,076,266	508,170	137,775	77,661	63,122	30,240	19,309	8,406	3,642	2,941		2,941	1,927,532
R0170	N-8	954,595	458,560	103,549	79,443	57,667	45,581	19,546	8,235	2,456			2,456	1,729,632
R0180	N-7	987,142	387,229	104,536	76,229	69,079	55,467	34,397	25,322				25,322	1,739,401
R0190	N-6	951,953	439,415	110,803	79,005	63,095	76,450	26,847					26,847	1,747,568
R0200	N-5	1,077,689	424,261	114,108	67,958	73,421	51,753						51,753	1,809,190
R0210	N-4	1,126,644	422,419	108,309	89,121	83,159							83,159	1,829,652
R0220	N-3	1,269,059	457,869	111,472	92,556								92,556	1,930,956
R0230	N-2	1,194,036	382,195	116,797									116,797	1,693,028
R0240	N-1	953,621	340,411										340,411	1,294,032
R0250	N	1,008,146											1,008,146	1,008,146
R0260												**Total**	1,764,671	16,723,420

Gross undiscounted best estimate claims provisions

(absolute amount)

						Development year							
	Year	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10 & +**	**Year end (discounted data)**
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
R0100	Prior											230,342	214,905
R0160	N-9					214,705	110,879	46,847	15,463	12,021	8,516		8,023
R0170	N-8				327,333	177,110	74,317	30,825	12,398	9,381			9,079
R0180	N-7			647,359	453,379	307,445	175,815	104,974	56,620				52,263
R0190	N-6		736,605	514,972	340,362	249,529	117,633	95,794					87,825
R0200	N-5	1,405,227	684,613	456,185	299,674	184,722	122,967						117,071
R0210	N-4	1,447,754	624,522	395,155	273,066	176,405							171,358
R0220	N-3	1,299,375	593,366	424,890	333,900								318,561
R0230	N-2	1,158,339	548,505	391,548									377,181
R0240	N-1	1,073,671	467,658										449,896
R0250	N	1,186,849											1,159,391
R0260												**Total**	2,965,553

S.22.01.21
Impact of long-term guarantees and transitional measures (£'000)

		Amount with long-term guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
R0010	Technical provisions	4,553,969			35,818	
R0020	Basic own funds	2,091,383			(12,174)	
R0050	Eligible own funds to meet Solvency Capital Requirement	2,091,383			(12,174)	
R0090	Solvency Capital Requirement	1,304,678			(126)	
R0100	Eligible own funds to meet Minimum Capital Requirement	1,916,153			(15,729)	
R0110	Minimum Capital Requirement	529,921			829	

S.23.01.01
Own funds
(£'000)

		Total	Tier 1 – unrestricted	Tier 1 – restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35					
R0010	Ordinary share capital (gross of own shares)	580,765	580,765			
R0030	Share premium account related to ordinary share capital	150,000	150,000			
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings					
R0050	Subordinated mutual member accounts					
R0070	Surplus funds					
R0090	Preference shares					
R0110	Share premium account related to preference shares					
R0130	Reconciliation reserve	1,079,404	1,079,404			
R0140	Subordinated liabilities	251,876			251,876	
R0160	An amount equal to the value of net deferred tax assets	29,338				29,338
R0180	Other own fund items approved by supervisory authority as basic own funds not specified above					
	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					
R0220	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					
	Deductions					
R0230	Deductions for participations in financial and credit institutions					
R0290	**Total basic own funds after deductions**	2,091,383	1,810,169		251,876	29,338
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand					
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual-type undertakings, callable on demand					
R0320	Unpaid and uncalled preference shares callable on demand					
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand					
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC					
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC					
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC					
R0370	Supplementary members calls —other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC					
R0390	Other ancillary own funds					
R0400	**Total ancillary own funds**					

S.23.01.01 continued
Own funds
(£'000)

		Total	Tier 1 – unrestricted	Tier 1 – restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	2,091,383	1,810,169		251,876	29,338
R0510	Total available own funds to meet the MCR	2,062,045	1,810,169		251,876	
R0540	Total eligible own funds to meet the SCR	2,091,383	1,810,169		251,876	29,338
R0550	Total eligible own funds to meet the MCR	1,916,153	1,810,169		105,984	
R0580	**SCR**	1,304,678				
R0600	**MCR**	529,921				
R0620	**Ratio of eligible own funds to SCR**	1.6030				
R0640	**Ratio of eligible own funds to MCR**	3.6159				

		C0060
	Reconciliation reserve	
R0700	Excess of assets over liabilities	1,929,507
R0710	Own shares (held directly and indirectly)	
R0720	Foreseeable dividends, distributions and charges	90,000
R0730	Other basic own fund items	760,103
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring-fenced funds	
R0760	**Reconciliation reserve**	1,079,404
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) — life business	
R0780	Expected profits included in future premiums (EPIFP) — non-life business	140,360
R0790	**Total expected profits included in future premiums (EPIFP)**	140,360

Note that the expected profit in future premiums is a Solvency II specific measure of lapse risk and not a measure of overall profitability of the business. Please see C.4 Liquidity risk for details.

G.3 U K INSURANCE LIMITED continued

S.25.03.21

Solvency Capital Requirement – for undertakings on full internal models

(£'000)

Unique number of component	Components description	Calculation of Solvency Capital Requirement
C0010	C0020	C0010
103011	Other interest rate risk – interest rate risk (assets)	209,761
103021	Other interest rate risk – interest rate risk (liabilities)	189,692
103991	Diversification within other interest rate risk	(269,055)
104001	Equity risk	
106001	Property risk	56,369
107011	Spread risk	428,828
107021	Credit risk (asset)	166,389
107991	Diversification within spread and credit risk (asset)	(73,673)
108001	Concentration risk	
109001	Currency risk	
199001	Diversification within market risk	(157,243)
203001	Other counterparty risk	66,531
501001	Premium risk	612,919
502001	Reserve risk	494,859
503001	Non-life catastrophe risk	694,816
599001	Diversification within non-life underwriting risk	(637,698)
701001	Operational risk	247,885
801001	Other risks	41,924
803001	Loss-absorbing capacity of deferred tax	(72,321)
804001	Other adjustments	

S.25.03.21 continued

Solvency Capital Requirement – for undertakings on full internal models

(£'000)

		C0100
R0110	Total undiversified components	1,999,983
R0060	Diversification	(695,305)
R0160	Capital requirement for business operated in accordance with Article 4 of Directive 2003/41/EC (transitional)	
R0200	**Solvency capital requirement excluding capital add-on**	1,304,678
R0210	Capital add-ons already set	
R0220	**Solvency Capital Requirement**	1,304,678
	Other information on SCR	
R0300	Amount / estimate of the overall loss-absorbing capacity of technical provisions	
R0310	Amount / estimate of the overall loss-absorbing capacity of deferred taxes	(72,321)
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds (other than those related to business operated in accordance with Article 4 of Directive 2003/41/EC (transitional)	
R0430	Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	
R0440	Diversification effects due to RFF nSCR aggregation for Article 304	

S.28.01.01

Minimum Capital Requirement – only life or only non-life insurance or reinsurance activity (£'000)

		C0010
Linear formula component for non-life insurance and reinsurance obligations		
R0010	MCRNL Result	523,785

		Net (of reinsurance / SPV) best estimate and TP calculated as a whole C0020	Net (of reinsurance) written premiums in the last 12 months C0030
R0030	Income protection insurance and proportional reinsurance	4,957	4,507
R0050	Motor vehicle liability insurance and proportional reinsurance	1,927,993	1,050,379
R0060	Other motor insurance and proportional reinsurance	191,484	562,733
R0080	Fire and other damage to property insurance and proportional reinsurance	490,599	814,321
R0090	General liability insurance and proportional reinsurance	124,420	102,147
R0110	Legal expenses insurance and proportional reinsurance	30,319	75,493
R0120	Assistance and proportional reinsurance	128,310	271,219
R0130	Miscellaneous financial loss insurance and proportional reinsurance	11,401	104,391

S.28.01.01 continued
Minimum Capital Requirement – only life or only non-life insurance or reinsurance activity
(£'000)

	Linear formula component for non-life insurance and reinsurance obligations	C0040
R0200	MCRL Result	6,136

		Net (of reinsurance / SPV) best estimate and TP calculated as a whole	**Net (of reinsurance / SPV) total capital at risk**
		C0050	C0060
R0240	Other life (re)insurance and health (re)insurance obligations	292,206	
R0250	Total capital at risk for all life (re)insurance obligations		

	Overall MCR calculation	C0070
R0300	Linear MCR	529,921
R0310	SCR	1,304,678
R0320	MCR cap	587,105
R0330	MCR floor	326,169
R0340	Combined MCR	529,921
R0350	Absolute floor of the MCR	3,126
R0400	**Minimum Capital Requirement**	529,921

G.4 CHURCHILL INSURANCE COMPANY LIMITED

General information

Undertaking name	**Churchill Insurance Company Limited**
Undertaking identification code	2138007B4PLYNW611O59
Type of code of undertaking	LEI
Type of undertaking	Non-life insurance undertakings
Country of authorisation	GB
Language of reporting	EN
Reporting reference date	31 December 2021
Currency used for reporting	GBP
Accounting standards	The undertaking is using IFRS
Method of calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	Volatility adjustment is applied to the following lines of business: Motor vehicle liability insurance Annuities from non-life
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

S.02.01.02	Balance sheet
S.05.01.02	Premiums, claims and expenses by line of business
S.05.02.01	Premiums, claims and expenses by country
S.12.01.02	Life and health SLT technical provisions
S.17.01.02	Non-life technical provisions
S.19.01.21	Non-life insurance claims
S.22.01.21	Impact of long-term guarantees and transitional measures
S.23.01.01	Own funds
S.25.01.21	Solvency capital requirement – for undertakings on standard formula
S.28.01.01	Minimum capital requirement – only life or only non-life insurance or reinsurance activity

S.02.01.02
Balance sheet
(£'000)

		Solvency II value
		C0010
	Assets	
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant and equipment held for own use	
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	18,690
R0080	Property (other than for own use)	
R0090	Holdings in related undertakings, including participations	
R0100	Equities	
R0110	Equities – listed	
R0120	Equities – unlisted	
R0130	Bonds	
R0140	Government bonds	
R0150	Corporate bonds	
R0160	Structured notes	
R0170	Collateralised securities	
R0180	Collective investments undertakings	18,690
R0190	Derivatives	
R0200	Deposits other than cash equivalents	
R0210	Other investments	
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	
R0240	Loans on policies	
R0250	Loans and mortgages to individuals	
R0260	Other loans and mortgages	
R0270	Reinsurance recoverables from:	27,260
R0280	Non-life and health similar to non-life	
R0290	Non-life excluding health	
R0300	Health similar to non-life	
R0310	Life and health similar to life, excluding health and index-linked and unit-linked	27,260
R0320	Health similar to life	
R0330	Life excluding health and index-linked and unit-linked	27,260
R0340	Life index-linked and unit-linked	
R0350	Deposits to cedants	
R0360	Insurance and intermediaries receivables	
R0370	Reinsurance receivables	20
R0380	Receivables (trade, not insurance)	
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	
R0410	Cash and cash equivalents	13
R0420	Any other assets, not elsewhere shown	
R0500	**Total assets**	**45,983**

S.02.01.02 continued
Balance sheet
(£'000)

		Solvency II value
		C0010
	Liabilities	
R0510	Technical provisions – non-life	
R0520	Technical provisions – non-life (excluding health)	
R0530	TP calculated as a whole	
R0540	Best estimate	
R0550	Risk margin	
R0560	Technical provisions – health (similar to non-life)	
R0570	TP calculated as a whole	
R0580	Best estimate	
R0590	Risk margin	
R0600	Technical provisions – life (excluding index-linked and unit-linked)	31,618
R0610	Technical provisions – health (similar to life)	
R0620	TP calculated as a whole	
R0630	Best estimate	
R0640	Risk margin	
R0650	Technical provisions – life (excluding health and index-linked and unit-linked)	31,618
R0660	TP calculated as a whole	
R0670	Best estimate	31,054
R0680	Risk margin	564
R0690	Technical provisions – index-linked and unit-linked	
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	41
R0790	Derivatives	
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	131
R0820	Insurance and intermediaries payables	
R0830	Reinsurance payables	
R0840	Payables (trade, not insurance)	105
R0850	Subordinated liabilities	
R0860	Subordinated liabilities not in BOF	
R0870	Subordinated liabilities in BOF	
R0880	Any other liabilities, not elsewhere shown	
R0900	**Total liabilities**	**31,895**
R1000	**Excess of assets over liabilities**	**14,088**

S.05.01.02

Premiums, claims and expenses by line of business

Non-life

(£'000)

		Line of business for: life insurance obligations	
		Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	**Total**
		C0260	C0300
	Premiums written		
R0110	Gross – direct business		
R0120	Gross – proportional reinsurance accepted		
R0130	Gross – non-proportional reinsurance accepted		
R0140	Reinsurers' share		
R0200	Net		
	Premiums earned		
R0210	Gross – direct business		
R0220	Gross – proportional reinsurance accepted		
R0230	Gross – non-proportional reinsurance accepted		
R0240	Reinsurers' share		
R0300	Net		
	Claims incurred		
R0310	Gross – direct business		
R0320	Gross – proportional reinsurance accepted		
R0330	Gross – non-proportional reinsurance accepted		
R0340	Reinsurers' share		
R0400	Net		
	Changes in other technical provisions		
R0410	Gross – direct business		
R0420	Gross – proportional reinsurance accepted		
R0430	Gross – non-proportional reinsurance accepted		
R0440	Reinsurers' share		
R0500	Net		
R0550	**Expenses incurred**		
R1200	**Other expenses**		
R1300	**Total expenses**		

G.4 CHURCHILL INSURANCE COMPANY LIMITED continued

S.05.01.02 continued
Premiums, claims and expenses by line of business
Life
(£'000)

		Line of business for: life insurance obligations	
		Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Total
		C0260	C0300
	Premiums written		
R1410	Gross		
R1420	Reinsurers' share		
R1500	Net		
	Premiums earned		
R1510	Gross		
R1520	Reinsurers' share		
R1600	Net		
	Claims incurred		
R1610	Gross	29	29
R1620	Reinsurers' share	146	146
R1700	Net	(117)	(117)
	Changes in other technical provisions		
R1710	Gross		
R1720	Reinsurers' share		
R1800	Net		
R1900	**Expenses incurred**	137	137
R2500	**Other expenses**		
R2600	**Total expenses**		137

S.05.02.01
Premiums, claims and expenses by country
Non-life
(£'000)

		C0010	C0070
R0010		Home country	**Total top 5 and home country**
		C0080	C0140
	Premiums written		
R0110	Gross – direct business		
R0120	Gross – proportional reinsurance accepted		
R0130	Gross – non-proportional reinsurance accepted		
R0140	Reinsurers' share		
R0200	Net		
	Premiums earned		
R0210	Gross – direct business		
R0220	Gross – proportional reinsurance accepted		
R0230	Gross – non-proportional reinsurance accepted		
R0240	Reinsurers' share		
R0300	Net		
	Claims incurred		
R0310	Gross – direct business		
R0320	Gross – proportional reinsurance accepted		
R0330	Gross – non-proportional reinsurance accepted		
R0340	Reinsurers' share		
R0400	Net		
	Changes in other technical provisions		
R0410	Gross – direct business		
R0420	Gross – proportional reinsurance accepted		
R0430	Gross – non-proportional reinsurance accepted		
R0440	Reinsurers' share		
R0500	Net		
R0550	**Expenses incurred**		
R1200	**Other expenses**		
R1300	**Total expenses**		

S.05.02.01 continued
Premiums, claims and expenses by country
Life
(£'000)

		C0150	C0210
R1400		Home country	**Total top 5 and home country**
		C0220	C0280
	Premiums written		
R1410	Gross		
R1420	Reinsurers' share		
R1500	Net		
	Premiums earned		
R1510	Gross		
R1520	Reinsurers' share		
R1600	Net		
	Claims incurred		
R1610	Gross	29	29
R1620	Reinsurers' share	146	146
R1700	Net	(117)	(117)
	Changes in other technical provisions		
R1710	Gross		
R1720	Reinsurers' share		
R1800	Net		
R1900	**Expenses incurred**	137	137
R2500	**Other expenses**		
R2600	**Total expenses**		

S.12.01.02
Life and Health SLT technical provisions
(£'000)

		Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	**Total (life other than health insurance, including unit-linked)**
		C0090	C0150
R0010	**Technical provisions calculated as a whole**		
R0020	Total recoverables from reinsurance / SPV and Finite Re 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		
R0030	**Gross best estimate**	31,054	31,054
R0080	Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default	27,260	27,260
R0090	Best estimate minus recoverables from reinsurance / SPV and Finite Re – total	3,794	3,794
R0100	**Risk margin**	564	564
	Amount of the transitional on technical provisions		
R0110	Technical provisions calculated as a whole		
R0120	Best estimate		
R0130	Risk margin		
R0200	**Technical provisions – total**	31,618	31,618

S.17.01.02
Non-life technical provisions
(£'000)

		Direct business and accepted proportional reinsurance	
		Motor vehicle liability insurance	Total non-life obligation
		C0050	C0180
R0010	**Technical provisions calculated as a whole**		
R0050	Total recoverables from reinsurance / SPV and Finite Re 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		
R0140	Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default		
R0150	Net best estimate of premium provisions		
	Claims provisions		
R0160	Gross		
R0240	Total recoverable from reinsurance / SPV and Finite Re after the adjustment for expected losses due to counterparty default		
R0250	Net best estimate of claims provisions		
R0260	**Total best estimate – gross**		
R0270	**Total best estimate – net**		
R0280	**Risk margin**		
	Amount of the transitional on technical provisions		
R0290	Technical provisions calculated as a whole		
R0300	Best estimate		
R0310	Risk margin		
	Technical provisions – total		
R0320	Technical provisions – total		
R0330	Recoverable from reinsurance contract / SPV and Finite Re after the adjustment for expected losses due to counterparty default – total		
R0340	Technical provisions minus recoverables from reinsurance / SPV and Finite Re – total		

G.4 CHURCHILL INSURANCE COMPANY LIMITED continued

19.01.21

Non-life insurance claims (£'000)

Z0010 **Accident year / underwriting year** | Accident year

Gross claims paid (non-cumulative)

(absolute amount)

		Development year											In current year	Sum of years (cumulative)
	Year	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10 & +**		
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
R0100	**Prior**													
R0160	**N-9**													
R0170	**N-8**													
R0180	**N-7**													
R0190	**N-6**													
R0200	**N-5**													
R0210	**N-4**													
R0220	**N-3**													
R0230	**N-2**													
R0240	**N-1**													
R0250	**N**													
R0260												**Total**		

Gross undiscounted best estimate claims provisions

(absolute amount)

		Development year											Year end (discounted data)
	Year	**0**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10 & +**	
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
R0100	**Prior**												
R0160	**N-9**												
R0170	**N-8**												
R0180	**N-7**												
R0190	**N-6**												
R0200	**N-5**												
R0210	**N-4**												
R0220	**N-3**												
R0230	**N-2**												
R0240	**N-1**												
R0250	**N**												
R0260												**Total**	

S.22.01.21
Impact of long-term guarantees and transitional measures (£'000)

		Amount with long-term guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	
R0010	Technical provisions	31,618			1,270	
R0020	Basic own funds	14,088			(117)	
R0050	Eligible own funds to meet Solvency Capital Requirement	14,088			(117)	
R0090	Solvency Capital Requirement	832			9	
R0100	Eligible own funds to meet Minimum Capital Requirement	14,088			(117)	
R0110	Minimum Capital Requirement	3,126			–	

G.4 CHURCHILL INSURANCE COMPANY LIMITED continued

S.23.01.01
Own funds
(£'000)

		Total	Tier 1 – unrestricted	Tier 1 – restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35					
R0010	Ordinary share capital (gross of own shares)					
R0030	Share premium account related to ordinary share capital					
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings					
R0050	Subordinated mutual member accounts					
R0070	Surplus funds					
R0090	Preference shares					
R0110	Share premium account related to preference shares					
R0130	Reconciliation reserve	14,088	14,088			
R0140	Subordinated liabilities					
R0160	An amount equal to the value of net deferred tax assets					
R0180	Other own fund items approved by supervisory authority as basic own funds not specified above					
	Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds					
R0220	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					
	Deductions					
R0230	Deductions for participations in financial and credit institutions					
R0290	**Total basic own funds after deductions**	14,088	14,088			
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand					
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual-type undertakings, callable on demand					
R0320	Unpaid and uncalled preference shares callable on demand					
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand					
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC					
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC					
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC					
R0370	Supplementary members calls —other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC					
R0390	Other ancillary own funds					
R0400	**Total ancillary own funds**					

S.23.01.01 continued

Own funds

(£'000)

		Total	Tier 1 – unrestricted	Tier 1 – restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	14,088	14,088			
R0510	Total available own funds to meet the MCR	14,088	14,088			
R0540	Total eligible own funds to meet the SCR	14,088	14,088			
R0550	Total eligible own funds to meet the MCR	14,088	14,088			
R0580	**SCR**	832				
R0600	**MCR**	3,126				
R0620	**Ratio of eligible own funds to SCR**	16.933				
R0640	**Ratio of eligible own funds to MCR**	4.5067				

		C0060
	Reconciliation reserve	
R0700	Excess of assets over liabilities	14,088
R0710	Own shares (held directly and indirectly)	
R0720	Foreseeable dividends, distributions and charges	
R0730	Other basic own fund items	
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring-fenced funds	
R0760	**Reconciliation reserve**	14,088
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) —life business	
R0780	Expected profits included in future premiums (EPIFP) —non-life business	
R0790	**Total expected profits included in future premiums (EPIFP)**	

S.25.01.21

Solvency Capital Requirement – for undertakings on standard formula

(£'000)

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
R0010	Market risk	297		
R0020	Counterparty default risk	467		
R0030	Life underwriting risk	183	None	
R0040	Health underwriting risk		None	
R0050	Non-life underwriting risk		None	
R0060	Diversification	(255)		
R0070	Intangible asset risk			
R0100	**Basic Solvency Capital Requirement**	**692**		

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	140
R0140	Loss-absorbing capacity of technical provisions	
R0150	Loss-absorbing capacity of deferred taxes	
R0160	Capital requirement for business operated in accordance with Article 4 of Directive 2003/41/EC	
R0200	**Solvency capital requirement excluding capital add-on**	**832**
R0210	Capital add-on already set	
R0220	**Solvency Capital Requirement**	**832**
	Other information on SCR	
R0400	**Capital requirement for duration-based equity risk sub-module**	
R0410	Total amount of Notional Solvency Capital Requirement for remaining part	
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	
R0440	Diversification effects due to RFF nSCR aggregation for Article 304	

G.4 CHURCHILL INSURANCE COMPANY LIMITED continued

S.28.01.01
Minimum Capital Requirement – only life or only non-life insurance or reinsurance activity
(£'000)

Linear formula component for non-life and reinsurance obligations		C0010
R0010	MCRNL Result	

		C0040
R0200	MCRL Result	80

		Net (of reinsurance / SPV) best estimate and TP calculated as a whole	Net (of reinsurance / SPV) total capital at risk
		C0050	C0060
R0240	Other life (re)insurance and health (re)insurance obligations	3,794	
R0250	Total capital at risk for all life (re)insurance obligations		

	Overall MCR calculation	C0070
R0300	Linear MCR	80
R0310	SCR	832
R0320	MCR cap	374
R0330	MCR floor	208
R0340	Combined MCR	208
R0350	Absolute floor of the MCR	3,126
R0400	**Minimum Capital Requirement**	**3,126**