

**Rating Action: Moody's downgrades Direct Line's IFSR to A2, stable outlook**

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20 September 2023

London, September 20, 2023 – Moody's Investors Service ("Moody's") has downgraded to A2 from A1 the insurance financial strength rating (IFSR) of U K Insurance Limited, the key operating entity of Direct Line Insurance Group plc (DLG). In the same action, Moody's also downgraded DLG's subordinated debt rating to Baa2(hyb) from Baa1(hyb) and its restricted tier 1 securities – preferred stock non-cumulative rating – to Ba1(hyb) from Baa3(hyb). The outlooks on both issuers have been changed to stable from negative.

**RATINGS RATIONALE**

The rating downgrade reflects Moody's expectation that DLG will not restore its profitability to historical levels over the medium term, and concerns around its governance and potential reputational damage related to two past business reviews the group is carrying out.

While historical performance has been strong, supported by consistent reserve releases, DLG was negatively impacted in 2022 by difficult operating conditions in the UK personal lines property and casualty (P&C) market, especially motor. While negative trends affected the whole market, DLG has greater concentration in these lines than a number of peers who are either more diversified by line of business or have material other income streams such as those from non-insurance operations or reinsurance and coinsurance commissions. The 7 September announcement of the disposal of its brokered commercial lines business (NIG) to Intact Financial Corporation's subsidiary Royal & Sun Alliance Insurance Limited (A2, stable), while positive for capital, also increases DLG's concentration towards UK personal lines P&C. Furthermore, Moody's believes that DLG's underestimation of motor claims inflation in 2022 will drag underwriting earnings for longer than previously expected, making it less likely that profitability will be restored to historical levels over the medium term.

DLG has also been subject to regulatory scrutiny by the Financial Conduct Authority (FCA), resulting in two past business reviews related to historical pricing and claims payments, which raises concerns around the oversight of frontline business operations from a governance perspective. This could have an adverse impact on the group's franchise, leading to weaker new business and retention of customers.

Performance issues, property devaluations and widening credit spreads during 2022 led to DLG's capitalisation reducing substantially, towards the bottom end of its target range, and the suspension of the group's final dividend. The announced disposal of DLG's NIG business will improve DLG's Solvency II coverage, in excess of 190% on completion from 147% as at 30 June 2023. However, Moody's expects the group to maintain its Solvency II capitalisation towards the middle of its 140-180% target range over the longer term following its capital rebuild. While the transaction is credit positive for capitalisation, the rating agency views the disposal of a profitable business and resulting reduction in diversification as credit negative.

Factors supporting U K Insurance Limited's A2 IFSR include its strong position in the UK personal lines P&C market, improved solvency position, its relatively conservative investment portfolio and low financial leverage.

Moody's notes that while management has taken action to resolve issues relating to regulatory investigations, capitalisation and profitability, the group's exposure to governance risk has increased as a result of recent developments. Reflecting Moody's views of the aforementioned moderate governance risks, the governance issuer profile has been changed to G-3 from G-2 and the credit impact score has been changed to CIS-3 from CIS-2 to reflect the negative impact this risk has had on its ratings. The appointment of a CEO with a track record in UK personal lines business, who will take the role in 2024, is considered a positive development.

## OUTLOOK

The stable outlook reflects Moody's expectation that DLG will maintain its capital level at least in the middle of its 140-180% target range and return to profitability over the outlook period while maintaining its strong market position.

## FACTORS THAT COULD LEAD TO AN UPGRADE OR DOWNGRADE OF THE RATINGS

Moody's said that the following factors could lead to an upgrade of DLG's rating: (1) Profitability sustainably restored to historical levels, evidenced by return on capital in excess of 10%; (2) Strengthening of the group's franchise, evidenced by improved market share, and materially lower concentration in UK personal lines; (3) Maintenance of the group's Solvency II ratio towards the upper end of its 140-180% target range; and (4) Adjusted financial leverage consistently below 25%.

Conversely, the following factors could lead to a downgrade of DLG's rating: (1) Ongoing weak profitability of the business, evidenced by return on capital consistently below 5%; (2) Material weakening of the group's franchise; and (3) Solvency II ratio remaining consistently towards the lower end of group's 140-180% target range.

## PRINCIPAL METHODOLOGY

The principal methodology used in these ratings was Property and Casualty Insurers Methodology published in January 2023 and available at <https://ratings.moodys.com/rmc-documents/397707>. Alternatively, please see the Rating Methodologies page on <https://ratings.moodys.com> for a copy of this methodology.

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For further specification of Moody's key rating assumptions and sensitivity analysis, see the sections Methodology Assumptions and Sensitivity to Assumptions in the disclosure form. Moody's Rating Symbols and Definitions can be found on <https://ratings.moodys.com/rating-definitions>.

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At least one ESG consideration was material to the credit rating action(s) announced and described above.

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Will Keen-Tomlinson  
VP-Senior Analyst  
Financial Institutions Group  
Moody's Investors Service Ltd.  
One Canada Square  
Canary Wharf  
London  
United Kingdom  
JOURNALISTS: 44 20 7772 5456  
Client Service: 44 20 7772 5454

Simon James Robin Ainsworth  
Associate Managing Director  
Financial Institutions Group  
JOURNALISTS: 44 20 7772 5456  
Client Service: 44 20 7772 5454

Releasing Office:  
Moody's Investors Service Ltd.  
One Canada Square

Canary Wharf  
London, E14 5FA  
United Kingdom  
JOURNALISTS: 44 20 7772 5456  
Client Service: 44 20 7772 5454



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