

Catalina Worthing Insurance Limited

Solvency and Financial Condition Report (SFCR)

31 December 2024

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Executive Summary

Catalina Worthing Insurance Limited (“the Company” or “CWIL”) is a UK-based non-life insurance undertaking regulated by the Prudential Regulation Authority (“PRA”) and the Financial Conduct Authority (“FCA”).

The Solvency and Financial Condition Report (“SFCR”) has been prepared in accordance with the requirements of the PRA Regulatory Reporting regime 2024. It covers the Business and Performance of the Company, its System of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management.

In accordance with the PRA policy statement 18/25, CWIL is deemed to be a “small firm” and therefore its SFCR is exempt from the requirement to be externally audited.

Where necessary, comparatives in this document have been restated to conform to changes in presentation in the current year.

Business and Performance

The Company has been in run-off since July 2012. Its principal activities are the efficient and orderly run-off of its claims portfolio, the management of its cash and investments, and the timely collection of its reinsurance assets and other debts.

During the year, the Company made a loss after tax of £39.3 million (2023: loss after tax of £19.6 million). This mainly comprised a loss on the technical account of £31.4 million (2023: loss of £34.6 million) and net investment losses of £8.1 million (2023: profit of £14.5 million). Net other income and taxes totalled £0.2 million (2023: £0.5 million).

The loss on the technical account of £31.4 million (2023: loss of £34.6 million) was largely driven by reserve strengthening of UK and US asbestos reserves and experience on US abuse claims.

Investment losses of £8.1 million (2023: profit of £14.5 million) comprise interest and dividend income as well as net realised and unrealised gains and losses. The Company’s investment result in 2024 was adversely impacted by significant unrealised losses on its real estate and fixed income maturity investments.

Section A includes further details about the Company’s financial performance in the year.

System of Governance

The Company has in place a Target Operating Model which is a framework by which governance across the wider Catalina Group operates. The Board is responsible for managing the overall direction and activities of the company and for ensuring that an appropriate system of governance is in place.

A Risk Management Framework is embedded within the Company as well as the wider Catalina Group to ensure the objectives of respective entities are achieved.

Section B includes further details of the Company’s system of governance and risk management framework, including its implementation of the “Three Lines” model.

Risk Profile

The Company’s risk profile has not changed significantly during the year. Its material risks are reserving, market, credit, liquidity and operational risks. Inflation, cyber security and climate change are influencing the Company’s risk profiles to some degree and actions to further mitigate risks have been developed. Section C includes further details of the risks to which the Company is exposed and the methods by which it manages and mitigates these risks.

The latest Own Risk and Solvency Assessment (“ORSA”) was approved by the Board in August 2024. The ORSA is an integral part of the business and is considered in the strategic decisions of the Company.

Valuation for Solvency Purposes

Assets, technical provisions and other liabilities are valued in the Company's Solvency II Balance Sheet according to Solvency II regulations.

As at 31 December 2024, CWIL's total own funds of £151.3 million (2023: £183.1 million) were £11.2 million higher (2023: £3.7 million higher) than the net assets in the CWIL financial statements of £140.1 million (2023: £179.4 million). The difference is primarily due to the valuation of gross and reinsurance technical provisions.

Section D provides further details of the different valuation bases used by Solvency II and UK GAAP for assets, technical provisions and other liabilities.

Capital Management

The Company uses the Standard Formula to calculate its Solvency Capital Requirement ("SCR"). As at 31 December 2024, the Solvency II surplus was £77.1 million (2023: £100.3 million) corresponding with a Solvency II coverage ratio of 204% (2023: 221%).

The Company's own funds comprise £143.0 million (2023: £174.8 million) of Tier 1 unrestricted own funds and £8.3 million (2023: £8.3 million) of Tier 3 own funds. As at 31 December 2024, there were no restrictions on the eligibility of the Company's own funds to cover its SCR (2023: no restrictions).

	2024	2023
	GBP'000	GBP'000
Total own funds	151,259	183,126
Standard Formula Solvency Capital Requirement	74,242	82,834
Solvency II surplus	77,017	100,292
Ratio of eligible own funds to SCR	204%	221%

Outlook

The Company will continue its focused and pro-active approach to agreeing claims. This will facilitate compliance with the Financial Conduct Authority ("FCA") requirements and show consistent and fair treatment of customers' claims. Where appropriate, the Company's management will continue to outsource elements of the portfolio to FCA-authorised outsourced providers to manage claims. The Company maintains close control over the activities of its Third Party Administrators and legal panel.

The Company expects to significantly increase the size of its claims reserves under run-off. In 2018, the Catalina Group and Zurich Insurance plc ("Zurich") signed a definitive agreement under which Zurich's UK Employers' Liability policies for 2006 and prior will be transferred to Catalina in two stages. At present, these policies are reinsured from Zurich to Catalina General Insurance Ltd. ("CatGen"), a Bermuda-based reinsurance subsidiary of the Catalina Group. The second stage of the transaction involves a Part VII transfer of these insurance liabilities into CWIL, accompanied by a quota share reinsurance from CWIL to CatGen. The Part VII transfer into CWIL is subject to necessary regulatory approvals and the approval of the UK High Court. This transfer is not expected to be completed until the first half of 2026. From 1 January, 2022 and until the date of transfer, Catalina Services UK Limited ("CSUK") will service these claims on behalf of Zurich.

Subsequent to 31 December 2024, there have been no material changes in the business and performance, system of governance, valuation for solvency purposes, and capital management for the Company.

Statement of Directors' Responsibilities

We acknowledge our responsibility for preparing the SFCR in all material respects in accordance with the PRA Rules and the Solvency II Regulations.

We are satisfied that:

- a) throughout the financial year ended 31 December 2024, the insurer has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable to the insurers; and
- b) it is reasonable to believe that the insurer has continued so to comply subsequently and will continue so to comply in future.

By Order of the Board



G J McAndrew

Director

1 April 2025

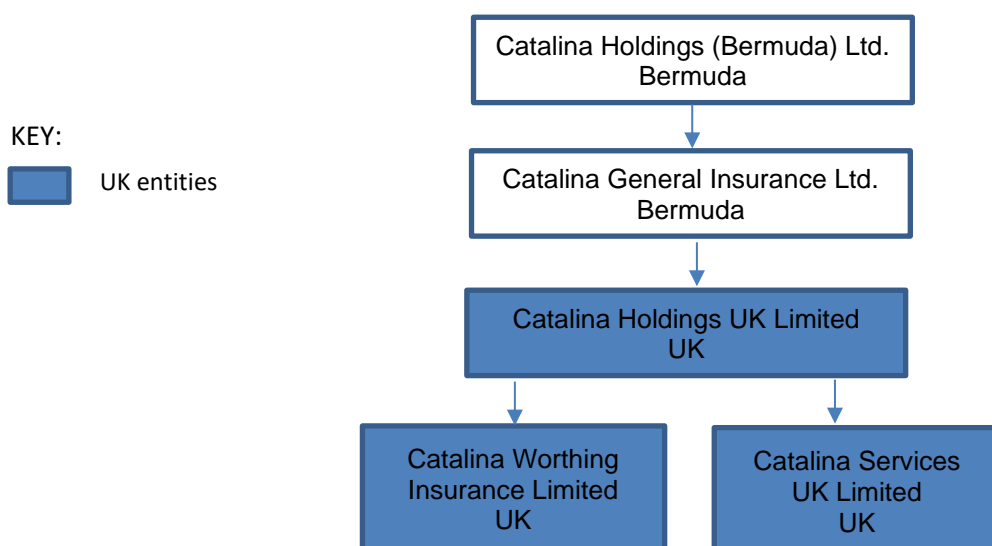
A. Business and Performance

A.1 Business and external environment

A.1.1 Undertaking, financial supervisory authority and external auditor

Name of the undertaking:	Catalina Worthing Insurance Limited
Address of its registered office:	Second Floor, Units B-C, Downlands Business Park Worthing BN14 9RX
Legal status:	Private Limited Company
Company registration number:	05965916
Legal Entity Identifier (LEI):	213800JEV93JTFJ41Q27
Ultimate parent:	Catalina Holdings (Bermuda) Ltd.
Financial supervisory authority:	Prudential Regulation Authority Bank of England Threadneedle Street London EC2R 8AH
External auditor:	Deloitte LLP 2 New Street Square London EC4A 3BZ

A simplified structure chart is laid out below outlining subsidiary companies, vertical structure and ultimate shareholder ownership. No director of the ultimate holding company sits on the Board of any of the UK legal entities.



The majority shareholders of Catalina Group are the affiliates (the “Apollo Funds”) of Apollo Global Management, LLC (together with its consolidated subsidiaries, “Apollo”) (NYSE: APO). RenaissanceRe Ventures Limited, a subsidiary of RenaissanceRe Holdings Limited (NYSE, RNR) is the minority shareholder alongside Catalina’s management.

The ultimate parent of CWIL is Catalina Holdings (Bermuda) Ltd. (“CHBL”). CHBL is a specialist consolidator of life and non-life insurance and reinsurance companies and portfolios in run-off. The Group is based in Bermuda and currently has offices in Bermuda, the United Kingdom, the United States of America, and Singapore.

In the UK, Catalina Holdings UK Limited (“CHUK”) is the insurance holding company of the Catalina UK Group. CHUK acts as the parent company of CWIL and Catalina Services UK Limited (“CSUK”), an insurance intermediary regulated by the FCA. As at 31 December 2024, CWIL is the sole insurance subsidiary of the UK Group.

CWIL prepares its financial statements on a UK GAAP basis and its reporting currency is GBP.

A.1.2 Material lines of business and geographical areas where the Company carries out business

CWIL was acquired by Catalina from The Hartford in 2017. The Company was initially established by The Hartford as a specialist Directors and Officers (“D&O”) writer in the London market where it wrote business from 2007 until July 2012 when it was placed into run off. In October 2015, the insurance business of Excess Insurance Company Limited (“Excess”), Hart Re (the trading name of the London branch of Hartford Fire Insurance Company Limited) and a portfolio of business originally written by London & Edinburgh Insurance Company (“L&E”) was transferred into the company by order of the High Court pursuant to Part VII of the Financial Services and Markets Act 2000.

In November 2022, the insurance business of AGF Insurance Limited (“AGF”) and Catalina London Limited (“CLL”), both of which were formerly regulated insurance subsidiaries owed by CHUK, were transferred into CWIL by order of the High Court pursuant to Part VII of the Financial Services and Markets Act 2000. Following the Part VII transfer, AGF and CLL were de-authorised by the PRA in April 2023 and subsequently dissolved. Within this report, CWIL’s insurance business preceding this Part VII transfer is referred to as the “legacy CWIL business”.

As at 31 December 2024, CWIL’s portfolio comprises the following books of business:

- Original Directors and Officers (“D&O”) business written in 2007-2012 as The Hartford;
- Excess business written prior to 1992, which mainly comprise US direct and treaty business Asbestos, Pollution and Health Hazard (“APH”) and UK Employers Liability business;
- Business of Hart Re, a pure reinsurer of European insurers which wrote business from 1993 to 2002, remaining risks being UK and European motor (including Periodic Payment Orders (“PPO”s)) and some pharmaceutical losses;
- L&E portfolio almost entirely consisting of US direct and treaty APH written through pools including Old Tower, Tower X, HS Weavers and B D Cooke;
- Business of AGF, originally incorporated under the name of Employers’ Mutual Insurance Association Limited, which wrote predominantly direct Employers’ Liability and Public Liability insurance within the UK until 1999; and
- Business of CLL formed through the combination of Alea London Limited (formerly The Imperial Fire and Marine Reinsurance Company), KX Re and OX Re, comprising property and casualty, aviation, marine, motor, personal lines and London Market. OX Re was also a member of a pool that reinsured property and casualty risks written by Community Re between 1979 and 1983. The OX Re book of business was fully commuted in 2022.

The table below shows the distribution of the Company's UK GAAP gross reserves by class of business across its direct and reinsurance portfolios:

Class of Business	2024 % of Reserves	2023 % of Reserves
Property	3.4%	3.0%
Liability	68.5%	70.0%
Marine, Aviation and Transport	1.0%	1.1%
Reinsurance – Casualty	25.4%	24.3%
Reinsurance – Marine, Aviation and Transport	0.6%	0.6%
Reinsurance - Property	1.1%	1.0%

A.2 Performance from underwriting activities

The table below shows the underwriting performance for the Company for the year ended 31 December 2024, together with comparatives for the previous year.

During 2024, the Company realised a loss on the technical account of £31.4 million (2023: £34.6 million).

	2024 GBP'000	2023 GBP'000
Earned premiums, net of reinsurance	-	41
Claims incurred, net of reinsurance	(18,854)	(22,268)
Net operating expenses	(12,553)	(12,379)
Balance on the technical account	(31,407)	(34,606)
By class of business:		
Property	(706)	(1,095)
General liability	(20,868)	(28,237)
Marine, aviation and transport	16	(1,475)
Reinsurance – Casualty	(7,951)	(2,991)
Reinsurance – Marine, aviation and transport	363	299
Reinsurance – Property	(2,261)	(1,107)
Balance on the technical account	(31,407)	(34,606)

The Company's technical result for the year ended 31 December 2024 was largely driven by adverse claims valuation outcomes. Reserves were increased by a strengthening of UK and US asbestos reserves and experience on US abuse claims.

A.3 Performance from investment activities

The table below shows the investment income for the Company for the year ended 31 December 2024, together with comparatives for the previous year.

	2024 GBP'000	2023 GBP'000
Net investment income	16,899	14,948
Net investment expenses	(349)	(403)
Net realised losses	(364)	(8,793)
Changes in fair value	(24,299)	8,781
Net investment result	(8,113)	14,533

Total investment losses in 2024 were £8.1 million (2023: return of £14.5 million). The Company's investment result in 2024 was adversely impacted by significant unrealised losses on its real estate and fixed income maturity investments.

A.4 Other operating income and expenses

The table below details any other material operating income and expenses not shown in A2 and A3 above.

	2024	2023
	GBP'000	GBP'000
Foreign exchange gains	244	46
Tax (charge)/credit	(47)	427

Foreign exchange gains of £244k (2023: gains of 46k) arose from translation of foreign currency net assets into GBP, the Company's reporting currency.

Tax charge of £0.1 million (2023: credit of £0.4 million) reflects a change in prior year group relief, which had been relieved against CWIL's brought forward losses. This relief was adjusted to be relieved against another group company's brought forward losses during the year. CWIL made a payment for this group loss relief adjustment at the prevailing rate of tax for the year.

A.5 Any other disclosures

Not applicable.

B. System of Governance

B.1 General Governance arrangements

The Company's governance structures and policies are documented in a Governance and Internal Control ("GIC") Framework. The Board operates under agreed Terms of Reference and dictates a clear system of governance that covers all significant aspects of the business, provides an open forum for challenge, and allocates clear responsibilities for both collective management committees and individuals.

The Board comprises:

- Three independent non-executive directors ("INED");
- One non-executive director (group nominated);
- Chief Executive Officer ("CEO");
- Chief Financial Officer ("CFO"); and
- UK Chief Claims Officer.

The Board mandates clear responsibilities for the four required key functions:

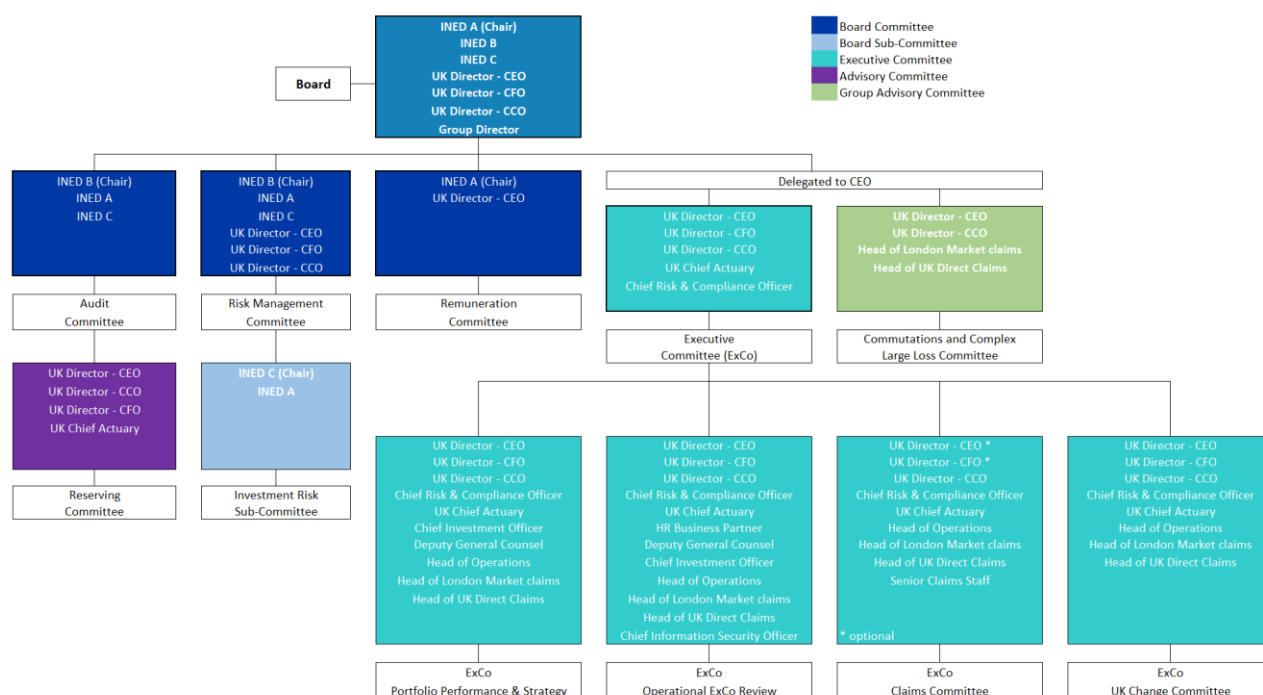
- Risk management;
- Actuarial;
- Compliance; and
- Internal audit.

In addition to the required key functions, the Board has determined that claims, investment management, outwards reinsurance, human resources and operations are key functions. The allocation of the Senior Manager Functions and key function holders is set out in the GIC and the Management Responsibilities Map ("MRM"). All senior managers and key function holders are employed by CSUK. The allocation of the Prescribed Responsibilities is also set out in the MRMs.

Target Operating Model

The Company has in place a Target Operating Model ("TOM") which is the framework by which governance across the Catalina group operates.

The following summarises the current TOM for CWIL:



Board Risk Management Committee

The Board Risk Management Committee (“RMC”) meets outside of Board meetings, is chaired by an INED and currently comprises all the Executive directors and INEDs of the Company’s Board. The purpose is to have an enhanced focus on risks faced by the Group and the mitigation of those risks.

The Board has delegated the responsibility of oversight of the Risk Management Framework and Policy to the UK Chief Risk and Compliance Officer (“CRCO”). The Risk Management Framework and Policy defines the framework of the systems, controls, processes and procedures in place to identify, assess, mitigate and manage risk.

The Company has determined its risk appetite and a number of risk tolerances that are measured on a quarterly basis. Reports are included in the Risk Management Committee and Board papers on adherence to existing risk appetite levels and are summarised by the CRCO and the Risk Management Committee Chair at each Board meeting. The CRCO instructs the relevant risk owners to implement any remedial measures that the Board determines are appropriate.

A Board-level Investment Risk Sub Committee supports the RMC to provide further challenge to the UK Chief Investment Officer (“CIO”) on specific investment issues and thematic trends in the financial markets.

Board Audit Committee

A principal objective of the Board Audit Committee (“AC”) is to evaluate and provide assurance that the risk management, control and governance systems of the Company are functioning as intended and will enable its objectives and goals to be met. This includes the Board discharging its responsibilities for monitoring the integrity of the financial statements and monitoring the effectiveness, performance and objectivity of the internal and external auditors. The AC is solely made up of the INEDs.

The Board has delegated to the UK Head of Internal Audit the responsibility of oversight of the Catalina Group internal audit policy at CWIL legal entity level. An Internal Audit Charter defines the purpose, scope authority, responsibility and reporting relationships of the Internal Audit function in supporting the AC in its duties. The Charter is reviewed by the AC on an annual basis.

The following committees are not Board-level committees, but instead they comprise the key management personnel from CWIL and the wider Catalina Group. They act in an advisory capacity to the Board.

Executive Committee

The Board has delegated the day-to-day running of the Company to the UK CEO with a management team to assist in these duties. A report on these activities is presented at Board meetings which are held at least quarterly and with additional meetings as necessary.

The Executive Committee (“ExCo”) is comprised of the CEO, CFO, Chief Claims Officer, Chief Actuary and CRCO. The ExCo meets twice a year to assess the Target Operating Model and ongoing effectiveness of the working groups through which the business is managed. The working groups are the UK ExCo Operational Review, Claims Committee, Portfolio Performance & Strategy Group and UK Change Committee.

Reserving Committee

The Reserving Committee (“RC”) is in place to review and challenge the output from internal actuarial reviews. It is responsible for reviewing the adequacy of, and recommending the approval of, the Company’s reserves. Matters arising from the RC are reported to the AC.

Remuneration Committee

CWIL does not have any direct employees and its services are provided by CSUK. CSUK employees are retained on a fixed basic salary plus a discretionary bonus element. Remuneration is reviewed and benchmarked regularly to be competitive with the rest of the market. The Chair of the Board and the UK CEO form the UK Remuneration Committee and meet annually with the UK HR Business Partner to review pay awards and bonuses.

Commutations and Complex Large Loss Committee

The Commutations and Complex Large Loss Committee is an advisory committee charged with:

- i. The responsibility of overseeing claims practices, processes and procedures and providing a further level of control and direction for very large losses; and
- ii. The responsibility of CWIL's Commutation Policy and recommending all significant commutations.

Matters arising from this Committee are reported by the CEO to the Board.

Investments

The Board approves and has oversight over the Strategic Asset Allocation ("SAA"), investment risk appetite and limits, delegating implementation and day-to-day oversight to the UK CIO. The CIO consults with the Catalina Group Investment & ALM Committee regarding overall investment strategy, as well as with the CWIL Board and Risk Management Committee. The CIO provides a report to Board and Risk Management Committee meetings, which looks at CWIL's investment risks and objectives, as well as its relative performance.

CWIL's SAA reflects its risk appetite and the requirements of the Prudent Person Principle. In particular, it sets out the requirement for technical liabilities to be backed by rated, liquid, relatively risk-free assets. Other investment classes, such as commercial real estate, are only used for investing surplus capital. Guidelines are in place governing the process for investing in alternative investments and these are closely monitored by the Enterprise Risk Management ("ERM") function.

B.2 Fit and proper requirements

Solvency II Requirements

The Solvency II Directive specifies that all persons who effectively run the undertaking or have other key functions are "fit and proper". Fit and proper persons must have the appropriate professional qualifications, knowledge and experience to enable them to perform their duties and fulfil their obligations, as well as be of good repute and integrity. Key functions are defined as all functions considered important or critical in the system of governance, including at least the Risk Management, Compliance, Internal Audit and Actuarial functions. The requirement for fit and proper extends to the Board, which collectively asserts that it has the qualifications, knowledge and experience to be able to provide for the sound and prudent management of the business.

The UK CEO is responsible for ensuring that activities are undertaken and managed by professionals with the appropriate experience, skill levels, and degrees of specialisation.

As part of the recruitment process, references are taken up and qualifications checked with the relevant authority or issuer. For senior managers and certification roles, regulatory references are obtained, and criminal record as well as credit reference checks are undertaken upon joining and reperformed every three years.

Regulatory Requirements

Under section 59 of the Financial Services and Markets Act 2000, authorised firms are required to ensure that individuals seeking to perform one or more of the FCA/PRA-designated Senior Management Functions seek PRA and/or FCA approval prior to taking up their position. Each Company manages these requirements in accordance with the Senior Managers and Certification Regime ("SM&CR").

The Company takes reasonable care to maintain a clear and appropriate apportionment of significant responsibilities among its directors and senior managers in such a way that:

- It is clear who has which of those responsibilities;
- The business affairs of the firm can be adequately monitored and controlled by the directors and relevant senior managers and governing body of the firm;

- The Prescribed Responsibilities for each company are included in the Management Responsibilities Map (“MRM”); and
- Each senior manager has a Statement of Responsibilities setting out those business areas for which they are directly responsible.

The Company maintains an MRM to satisfy the requirements regarding apportionment and allocation of significant responsibilities. The MRM is updated quarterly or more frequently if required.

The following table sets out the Senior Management Functions (“SMFs”) for the Company as at 31 December 2024:

Senior Manager Role	SMF	SMF role holder
Chief Executive Officer	SMF1	Graeme McAndrew
Chief Financial Officer	SMF2	Gregg Jarvis
Executive Director	SMF3	Darren Rowswell
Chief Risk Officer	SMF4	Christopher Porter
Head of Internal Audit	SMF5	Lee Langstaffe
Group Entity Senior Manager	SMF 7	Andrew Diaz-Matos
Chair of the Governing Body	SMF9	Tony Mason
Chair Risk Committee	SMF10	Penny Shaw
Chair Audit Committee	SMF11	Penny Shaw
Chair of the Remuneration Committee	SMF12	Tony Mason
Compliance Oversight	SMF16	Christopher Porter
Money Laundering Reporting Officer	SMF17	Christopher Porter
Chief Actuary	SMF20	Emma Burrows
Chief Operations Officer	SMF24	Darren Rowswell
Independent Non-executive Director		Walt Gontarek
Other overall responsibility:		
Chief Investment Officer	SMF18	Sean Stapleton

The UK Chief Risk Officer keeps the PRA informed of persons filling the designated roles and reviews that they meet the fitness and probity requirement on an ongoing basis. A person filling a controlled function must be:

- Competent and capable;
- Honest, ethical and act with integrity; and
- Financially sound.

These checks are conducted independently to any checks performed by the PRA under its own fit and proper review. Checks include: criminal record, credit, evidence of professional qualification and ongoing continuing professional development and reference.

The Company maintains an ongoing Board education programme from which the SMFs also receive the benefit.

In addition to the SMFs above, the following key functions and key function holders have been identified. These individuals also fall within the SM&CR certification regime:

Key function	Key function holder
Human Resources	Camilla Marley
Head of Outwards Reinsurance	Gary Pollard
Head of London Market Claims	Rebecca Payton
Head of UK Direct Claims	Claire Hobman
Head of Operations	Emma King

B.3 Risk management system

The Catalina UK enterprise risk management function is coordinated by the UK Chief Risk and Compliance Officer, who works under the authority of the Risk Management Committee. In line with the internal risk management policies of Catalina Group, CWIL's management team act as the 'first line'. They are primarily responsible for the running of the business and the operation of controls within their own areas, as well as the management of the business' risk profile, in line with Board expectations. Acting as the 'second line', the Risk Management Committee is responsible for the ongoing monitoring of business operations and the effectiveness and integrity of the risk management framework.

The overall risk management strategy is to ensure that a proper balance is struck between:

- The risks that are economically attractive to take. These must be properly modelled, measured and priced; and
- The risks that are economically unattractive to take. These should be avoided, identified, managed, mitigated and reduced where it is efficient to do so.

Within the Company's Risk Management Policy & Framework there are measures in place to ensure:

- Appropriate risk tolerances are in place to govern risk taking activities;
- An appropriate risk culture and risk appetite forms an essential part of strategic decision making;
- Measurement and monitoring of risk and reporting key risk metrics to senior management and the Board, including a Risk Appetite Dashboard; and
- Appropriate Business Planning and capital planning processes are in place to support the risk taking activities.

The risk framework is intended to reduce, but cannot eliminate, the range of possibilities which might cause detriment. Similarly, the risk management framework cannot provide protection with certainty against any failure to meet business objectives, or guard against material errors, losses, fraud, or breaches of law and regulations. The risk management framework is intended to provide reasonable assurance that business will be conducted in an orderly manner that reasonable foreseeable circumstances will not prevent or limit the achievement of business objectives.

In order to aid the management of overall risk, risk policies have been set for each of the core risk categories.

Own Risk and Solvency Assessment

The Own Risk and Solvency Assessment ("ORSA") documents the output of the Company's enterprise risk management process. The purpose of the ORSA is principally to support the Board of Directors and management to actively manage the economic risk and capital requirements and allow a strategic, forward-looking discussion of future risks and capital needs.

The Board and senior management's involvement are integrated into the ORSA process as they are engaged to challenge, discuss and debate the risks facing the Company. The ORSA process allows management, the Risk Management Committee and the Board to review the risk and capital requirements and take a strategic, forward-looking view of risks and capital requirements. The ORSA process includes a detailed

three-year capital management plan for the Company. As part of the ORSA process, the Company looks at the capital it requires using various bases including:

- Solvency II SCR; and
- Ultimate Capital Requirement (“UCR”).

Using these measures, the Company is able to assess its Own Solvency needs and the corresponding capital required. The Company utilises an internal model for the calculation of the UCR and the standard formula for the calculation of the SCR. Due to the long-tail nature of the Company’s claims liabilities, the UCR is deemed, by the Board, to be the appropriate measure of the Company’s capital requirements.

The ORSA process is used to highlight key issues to management, and allows management to confirm that:

- The current risk profile is understood and appropriate for the nature of a legacy portfolio and within the risk appetite of the Company;
- Capital requirements during the reporting period have continuously been met (or if not, corrective action was taken);
- The Company’s current capital and solvency position is appropriate;
- The Standard Formula model and Ultimate Capital Requirement leveraging output from the Company’s Internal Capital Model has been used appropriately for strategic decisions throughout the period;
- The risks to the enterprise that could likely change the risk profile are understood;
- The data used in this report to determine capital, technical provisions and other critical areas of this report has data quality controls, undergone peer review and where relevant has established signoffs as part of established BAU processes and procedures and the UK CRCO has identified no material data issues underlying this report;
- Plans to cover the solvency position and planned capital distributions over the required period are appropriate; and
- The volatility adjustment (subject to PRA approval) remains appropriate for the CWIL portfolio and sufficient tests are performed to assess the impact of changing assumptions to the VA and the impact to the CWIL balance sheet if the VA were turned to zero.

The ORSA is produced by management in conjunction with the Actuarial and Risk Management functions. The ORSA is presented to the Risk Management Committee and Board annually for challenge, comment and review. The most recent Board review took place in August 2024 with the ORSA approved in August 2024. The result of the Board’s review forms the basis for the future strategy of the business and for the following year’s ORSA.

Throughout the year ended 31 December 2024, the Company was within stated Tier I risk appetite and tolerances for the key indicators of solvency, reserving sufficiency, investment compliance, regulatory and strategic risk. Relevant Tier II exceptions were noted at the Risk Management Committee and Board with agreed remediation activities put into place.

B.4 Internal control system

The Company’s internal control systems provide assurance that its operations are effectively controlled, it is compliant with applicable laws and regulations, and its financial reporting is reliable. The Board is ultimately responsible for overseeing and maintaining the adequacy and effectiveness of the risk management and internal control systems. The oversight and management of these systems necessarily involves participation of the Board, the Audit Committee, the Risk Management Committee, senior management, Finance, Legal and Internal Audit. Responsibility for ensuring day-to-day oversight of the internal control system lies with the company’s Senior Management Function holders and Key Function holders.

The Company actively promotes risk awareness and the importance of internal controls throughout the organisation. All employees receive regular risk management training to ensure they have the necessary knowledge to respond to risks that arise in their day-to-day work. Both senior management and the risk management function are proactive at keeping risk awareness to the forefront of daily operations by:

- Ensuring that all employees are aware of their role in the internal control systems as per the Fit and Proper Policy;
- Ensuring consistent communication and implementation of the internal control systems;
- Establishing monitoring and reporting mechanisms to review and report the decision making processes; including the quarterly operational status of key controls; and
- Providing appropriate training to all employees.

Compliance Function

All actual or potential breaches of regulation are immediately referred to the UK Chief Risk and Compliance Officer.

The compliance function reports to the Risk Management Committee and is subject to oversight by the CEO. The Board is ultimately responsible to ensure that the Company remains compliant, where applicable, with the requirements of the 'PRA and FCA Handbooks of rules and guidance'.

The role of the compliance function is to support management in managing the Company's compliance risk and reputational risk. This also covers specific issues such as money laundering. At the operational level, the compliance function:

- Compiles and maintains Compliance Charts and/or Compliance Risk Assessments;
- Devises annual Compliance Plans to record risk-based activity for the coming year;
- Undertakes regular monitoring and ad-hoc reviews to verify that controls remain robust and adherence to procedures is maintained; and
- Reports compliance control failures, or incidents which may indicate a need to review Compliance Risk Assessments or mitigating procedures.

Within the Company, all payments and any potential new business arrangements are run through an Anti-Money Laundering ("AML"), Anti Bribery and Corruption and Sanctions ("ABC") online tool. Staff training on AML and ABC is also undertaken as part of the Compliance three year training program. The Board receives a quarterly report of any significant activity in these areas of monitoring.

The Board is also advised quarterly of the status of all open claims complaints.

Whistleblowing

There is both a Catalina Group and a Catalina UK Whistleblowing Policy. The UK Policy contains all of the necessary referrals as required under the FCA rules, including an independent "Whistleblowing Champion". At present this is the Chair of the Board. The Catalina intranet has a link to allow easy access to the whistleblowing hotline and a reporting facility. Reports may be made anonymously if the whistleblower so wishes. This Policy is included as part of the compliance induction process. Catalina takes whistleblowing reports seriously and to protect anyone who makes a complaint in good faith. Ethics training undertaken for all Catalina Group staff includes whistleblowing.

B.5 Internal audit function

The mission of the Internal Audit function ("IA") is to enhance and protect organisational value by providing risk-based, independent and objective assurance, advice, and insight to the Board and Senior Management. IA is the 'third line' within the Company. To ensure independence, the Head of Internal Audit reports to the Chair of the Audit Committee and functionally to the CEO.

The Internal Audit Charter defines the function's purpose, authority and responsibility and position within the organisation. This is reviewed by the Audit Committee on a periodic basis. The activities of the function, as noted in the charter, are designed to add value and facilitate the improvement of the organisations effectiveness and efficiency of governance, risk management, and internal control processes.

IA performs its own risk assessment which informs its annual internal audit plan. The Plan is reviewed and approved by the Audit Committee. Updates to the Plan may be made during the year to reflect the Company's evolving risk landscape and needs. Quarterly updates on the activities of IA are provided to the Audit Committee, these updates include:

- Detailed audit reports from the individual audits and summary audit opinions on the control environment of the specific processes, function and or themes audited;
- Annual summary controls report and opinion;
- Emerging trends and risk and control culture;
- The status of agreed management actions; and
- The adequacy and appropriateness of the resources and skills of the function.

The Head of Internal Audit meets privately with the Chair of the Audit Committee at least once a year. The IA function is authorised to review all areas of the Company's operations and to have full, free and unrestricted access to all of the Company's activities, records, property and personnel necessary to complete its audit work. IA is authorised to allocate resources, determine frequency of reviews, determine audit scopes and audit tools and techniques and, to obtain the necessary assistance and specialised subject matter expert services within or outside the Company to accomplish the audit objectives.

The operating guidance for the department is documented in the Catalina Internal Audit Framework. This is updated on an annual basis and adopts Global Internal Audit Standards (effective 9 January 2025). IA staff comply with the Code of Ethics issued by the Institute of Internal Auditors ("IIA") alongside the Catalina Code of Conduct. In addition, the operating guidance and practices are aligned to the UK Internal Audit Financial Services Code of Practice which has some additional requirements.

B.6 Actuarial function

The Company's Actuarial Function Holder is the Chief Actuary supported by an in-house actuarial team. The Group Chief Actuary provides additional peer review support. The actuarial function:

- Co-ordinates the UK GAAP reserving for CWIL, taking into account the in-house view and any opinions provided by external independent consultants;
- Adjusts the UK GAAP reserves to Solvency II Best Estimate of Liabilities ("BEL");
- Uses the BEL and audited balance sheet to calculate the Company's Standard Formula Capital Requirements, Risk Margin and Own Funds;
- Works closely with the Chief Risk and Compliance Officer on the ORSA and on wider risk management issues. For the ORSA in particular, the capital level and capital requirements on one-year and to-ultimate bases are projected over the planning period including the modelling of stresses, scenarios, and reverse stress tests;
- Through the Actuarial Function Holder Report, reports to the Board and opines on levels of reserve adequacy, reinsurance arrangements and underwriting policy; and
- Assesses the capital impacts of any material changes in the Company, such as a material change in its reinsurance arrangements.

Each of these activities is undertaken at least annually, but also on an "as and when required" basis to support the business and its decision-making processes.

B.7 Outsourcing

Outsourcing is the delegation of a process, service or activity to a service provider. The Company's core strategy is to utilise and enhance key and distinguishing in-house competences in areas required to manage and extract value from books of business under its control; such competences include claims adjustment, commutation negotiation, reinsurance collections, actuarial evaluation, capital modelling and developing and implementing the most effective and efficient exit strategies, whilst at all times properly meeting the rights and requirements of policyholders, reinsurers, regulators, capital providers and other stakeholders.

When considering whether to outsource any process, service or activity to an external provider, the Company will take account of:

- Its own resource levels and availability;
- Its own internal capabilities and cost structures;
- The timing and extent of any requirements in comparison with the capabilities; and
- Costings and security of an outsource service provider.

The overarching principle will be that whereas processes, services or activities may be delegated to an outsource service provider, ultimate responsibility for those processes, services and activities will remain with the Company undertaking the outsourcing. Outsourcing arrangements have been established in locations that are a best fit for the underlying service.

The Company has an Outsourcing & Third Party Risk Management Policy, the purpose of which is to establish the requirements for identifying, justifying, and implementing outsourcing arrangements for its critical or important operational functions or activities. The objective of the Policy is to ensure that the outsourcing of critical or important operational functions or activities does not lead to:

- Reduction in the Board's responsibility for, or influence over key functions;
- Material impairment of the quality of the system of governance;
- Non-adherence to approved policies and procedures;
- Undue increases in operational risk or cost;
- Material impairment to fulfil obligations to stakeholders, nor impede effective supervision by regulators;
- Conflicts of interest; and
- Breach of data protection obligations.

The Board is ultimately responsible for the approval and termination of its outsourcing arrangements of critical or important functions or activities. Critical or important functions or activities include key functions of the system of governance and all functions that are fundamental to carry out its core business.

Within the Company, outsourcing is used in specific areas of claims handling and investment management. CWIL also has an intragroup outsource service agreement with CSUK for the provision of staff and ancillary services.

B.8 Assessment of Governance

Significant work has been undertaken to future-proof the Catalina governance model and to ensure it is proportionate to the nature, scale and complexity of the operations of the Company.

C. Risk Profile

C.1 Underwriting (Liability) Risk

C.1.1 Risk exposure

CWIL has been in run-off since 2012, however the vast majority of the Company's books of business have been in run off since 1992-1998. As at 31 December 2024, there were no unexpired insurance risk exposures from in-force policies.

Underwriting or insurance risk is concerned with fluctuations in the timing, frequency and severity of insured events, relative to expectations at the time of underwriting. As CWIL is no longer exposed to losses from new events, these risks are limited to reserve risk, i.e., the risk of losses due to the adverse development of loss reserves. CWIL monitors reserving volatility and its implications on the P&L through reserve deteriorations or redundancies, its booked reserves against external actuarial estimates and other measures like AvE for claims severity and frequency.

Actual underwriting results are monitored against budgeted results on a quarterly basis, although for meaningful variances the underwriting reserves, gross and net are subject to annual actuarial review which is compared to the Business Plan. Given CWIL's run-off status, management focuses primarily on variances in claims reserves.

In addition to the formal Committees that are part of the governance framework that monitor insurance risk, the Executive Committee meetings are an important tool to increase coordination and manage risk. There are three working groups: Operational Review Group held monthly where senior managers provide updates on local and group level initiatives and operational tasks; Claims Committee meetings held quarterly covering all classes of claims; and monthly Portfolio Performance and Strategy Group meetings at which the overall company business is reviewed in particular against objectives for the year. These meetings all contribute to ensuring insurance risk is being properly managed against strict and prudent reserving guidelines and standards.

CWIL has established robust systems and controls to ensure that claims settlement is performed according to its guidelines, within the adjuster authorities and to establish appropriate reporting requirements.

C.1.2 Underwriting (Liability) Risk Exposures, Concentrations, Mitigations and Sensitivities

Most of the Company's remaining gross exposures relate to asbestos, and hearing impairment claims, arising from employer's liability business in the UK and asbestos, pollution and health hazard losses arising from direct and treaty involvements in the US.

Liability risk exposures are mitigated by diversification across a portfolio of insurance contracts and geographical areas. Furthermore, strict claim review policies are in place to assess all new and ongoing claims, regular detailed review of claims handling procedures and frequent review of all claims are the key policies and procedures put in place to reduce risk exposure. CWIL further enforces a policy of actively managing and promptly pursuing claims, to reduce its exposure to unpredictable future developments that can negatively impact the business. Inflation risk is mitigated by taking expected inflation into account when estimating insurance contract liabilities.

Notwithstanding the impact of inflation, reserves are relatively insensitive, due to the events which caused the claim occurring many years ago. Nevertheless, reserve sensitivity is modelled in both the ORSA and in the Solvency II SCR. Risk sensitivity is further reduced through reinsurance. For the legacy CWIL business, an 80% quota reinsurance arrangement with CatGen, a Bermuda-based reinsurer which is part of the Catalina Group, significantly reduces the net exposure.

The reserving risk profile will materially shift due to an increase in UK Employers Liability ("EL") concentration once the Part VII transfer of the legacy Zurich EL is approved by the UK Courts, which is currently planned for March 2026. As a result of this transfer, the % mix of US exposure within CWIL will subsequently reduce and US exposure is viewed to be more volatile than the UK due to US sexual abuse

claims as a result of state and federal laws that have reopened statute of limitation windows on a state-by-state basis.

C.2 Market Risk

C.2.1 Risk exposure

Market risk is the risk of adverse financial impact as a consequence of market movements such as currency exchange rates, interest rates and other price changes. Market risk arises due to fluctuations in both the value of assets held and the value of liabilities.

All investment decisions are made subject to due consideration of the Prudent Person Principle (“PPP”) as set out in Supervisory Statement SS1/20 of the UK Solvency II Directive. The PPP requires the Company to develop an investment strategy that describes:

- Investment objectives and strategic asset allocation;
- consideration of investment constraints when setting investment objectives and strategic asset allocation;
- Alignment of the investment strategy with the business model and, where appropriate, how the strategy takes into account the nature and duration of a firm’s liabilities and obligations, and the best interests of policyholders;
- Alignment of investment strategy with board risk appetite, risk tolerance limits and investment risk and return objectives;
- Complete list of assets and how those assets have been invested in accordance with the PPP.

The Company seeks to maximise investment returns within its Board-approved Strategic Asset Allocation, the Investment Risk Policy and the Investment Policy Statement & Guidelines (“IPS”).

The Company’s investment policy and related guidelines have been formulated to ensure that they are in accordance with all aspects of the PPP. Its investment goals are to:

- Preserve invested capital;
- Protect policyholders’ interests and the Company’s ability to meet liability payouts and operating expense obligations as they become due;
- Manage the Company’s investment portfolios at all times in conformity with the UK regulatory and legal frameworks;
- Establish a liability driven investment strategy by way of respecting the duration profile of the liability portfolio and creating an asset liability matching investment portfolio;
- Optimise the portfolio to provide a sustainable risk-reward profile that ensures solvency coverage is not excessively impacted during severe market events; and
- Manage the investment portfolio in line with the established Risk Appetite Framework and the Company’s specific investment guidelines.

The Company’s investment policy and related guidelines are implemented by the in-house Catalina Asset Management team, with assistance from the Apollo Insurance Solutions Group (ISGI) and external investment managers as required to achieve optimal outcomes. The UK CIO is responsible for making investment decisions on behalf of the Company and for ensuring compliance with the asset allocation and counterparty exposure limits specified by the Company’s investment guidelines and risk appetite statements.

Interest rate risk

Interest rate risk is the risk that the value of future cash flows of a financial instrument will fluctuate because of changes in market interest rate.

The Company is exposed to interest rate risk from its long-term investments at both fixed and floating interest rates. The risk is managed by maintaining an appropriate mix between fixed and floating rate investments.

Asset/liability matching is an important component of CWIL's investment management philosophy. The weighted average life of investments is typically managed to be slightly shorter than liability run-off profiles.

The Company's main source of interest rate exposure is fixed-rate cash bonds of which they hold different types, primarily corporate and government bonds. There are also holdings of other asset types, such as municipal bonds and several types of securitized products. Many of those have floating-rate coupons so have little rate exposure.

Management actively monitors interest rate risk, primarily through use of key rate durations and effective duration. Limits on effective duration are specified in the Investment Guidelines, which are modelled using data from Bloomberg. The CIO reports to the Risk Committee and the Board on key market risk metrics and compliance with market risks.

While for UK GAAP purposes, the value of liabilities is unaffected by interest rate changes, for Solvency II purposes, the technical provisions are affected, as they are discounted in line with risk free interest rates. An increase in interest rates reduces the value of both interest rate-sensitive assets and the value of Solvency II technical provisions. This provides a natural offsetting effect, as the net impact is reduced compared to the monetary amount of the change for the assets or liabilities alone.

An interest rate risk charge is modelled as part of the solvency capital requirement, to ensure sufficient capital with a probability of 99.5% over a twelve month period.

The sensitivity analyses below have been determined based on the exposure to interest rates for investments held at the balance sheet date. A 1% increase or decrease is used when reporting interest rate risk internally to key management personnel and represents management's assessment of the reasonably possible change in interest rates.

Pre-Tax Profit Impact	2024 GBP'000	2023 GBP'000
1% increase	(21,438)	(12,136)
1% decrease	21,438	12,136

Foreign exchange risk

Foreign exchange risk is the risk that the value of future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates.

The Company undertakes certain transactions denominated in foreign currencies. Hence, exposures to exchange rate fluctuations arise. The risk of exposing the assets or liabilities to exchange rate fluctuations is managed by broadly matching liabilities with assets in the same currencies.

Assets and liabilities by currency are reviewed each quarter to ensure they are matched where possible and that cash is available to discharge liabilities in their respective currencies. From time to time, the Company may utilise foreign currency forward contracts as part of its overall foreign currency risk management strategy or to obtain exposure to a particular financial market. These derivatives are not designated as hedging investments.

The Company's main foreign currency exposures are to USD and EUR. The sensitivity analysis below has been determined based on the net asset exposure to USD and EUR movements as at 31 December 2024. A 10% increase or decrease is used when reporting foreign exchange risk internally to key management personnel and represents management's assessment of the reasonably possible change in currency rates.

Pre-Tax Profit Impact	2024 GBP'000	2023 GBP'000
GBP / USD		
10% increase in USD/GBP exchange rate	(306)	172
10% decrease in USD/GBP exchange rate	306	(172)
GBP / EUR		
10% increase in USD/EUR exchange rate	(1,345)	19
10% decrease in USD/EUR exchange rate	1,345	(19)

Other price risk

The Company is exposed to price risk arising from fluctuations in the value of financial instruments as a result of changes in the market prices and the risks inherent in all investments. The Company has no significant concentration of price risk. The risk is managed by maintaining an appropriate mix of investment instruments, including those with floating rate characteristics.

The Company's sensitivity to a 1% increase and decrease in market prices is as follows:

Pre-Tax Profit Impact	2024 GBP'000	2023 GBP'000
1% increase		
Movement in fair value of share and other variable securities in unit trusts	144	156
Movement in fair value of debt securities and other fixed income securities	1,962	2,043
Movement in fair value of other financial investments	693	982
1% decrease		
Movement in fair value of share and other variable securities in unit trusts	(144)	(156)
Movement in fair value of debt securities and other fixed income securities	(1,962)	(2,043)
Movement in fair value of other financial investments	(693)	(982)

C.2.2 Market Risk Exposures, Concentrations, Mitigations and Sensitivities

The Company manages investment risk through extensive use of portfolio management analysis software and the appointment of specialist third party asset managers, who have demonstrated an extensive and successful track record of managing assets on behalf of insurance and reinsurance clients. Mandates assigned to asset managers clearly stipulate the terms on which investments may be made. Documented mandates are referred to as Investment Policy Statements.

Quarterly scenario testing is performed based on various past market distress events to understand the implication of changes in asset mix and duration. For the management of interest rate risk, this takes the form of matching asset cashflow duration with maturities of liabilities to maintain adequate positive net cash flow and ascertain any duration imbalance.

Where appropriate and cost efficient, hedging strategies may be pursued to protect the strength and ensure the stability of the Company's asset base.

Historic stress tests are determined by looking at the total returns over a specified period. Market stress tests are determined by calculating the beta of each index to the time series used in the scenario definition, with two years of month-end to month-end returns for the data. Market stress tests are performed quarterly and are included in each company's risk management reporting packs.

CWIL is permitted to invest in publicly-traded equities in both the UK and the US. Bonds are owned in several currencies, but almost all holdings are held in currencies in which the majority of CWIL's insurance liabilities are denominated. Equity and currency exposures are tracked carefully; and are included in the VaR type analyses. The historic stress tests are essentially historic simulation models.

Market risk is tracked in various ways, including rate and spread durations, asset liability management and historic stress tests. The Company's assets and liabilities are well matched against liquidity and currency risk. There is a comprehensive set of investment checks and balances which define in detail the Company's risk appetite in respect of individual and sector concentration, effective duration, credit quality, and exposure to emerging markets and high yield instruments. Adherence to these measures forms part of the regular investment risk reporting. The Board and Risk Committee provides regular oversight of all investment decisions to ensure compliance the Company's guidelines and any relevant regulations.

C.3 Credit Risk

C.3.1 Risk exposure

Credit risk refers to the risk that a counterparty will default on its contractual obligations resulting in financial loss to the Company. The key areas of exposure to credit risk for CWIL are in relation to its investment portfolio, reinsurance programme and, to a lesser extent, amounts due from intermediaries. Policies and procedures are in place to manage and measure credit risk. For certain reinsurance arrangements, this includes mitigation through collateralisation arrangements.

Credit risk monitoring is mainly through the regular monitoring of external credit ratings for the Company's investment portfolio and its reinsurance assets. Only credit ratings from external credit assessments institutions are used, and the overall credit quality step is calculated in line with Solvency II regulations. Where there are no credit assessments from external credit assessments institutions, the credit quality step used is 'Unrated' (i.e., no internal credit assessments made at present).

The following table shows aggregated credit risk exposure for assets with external credit ratings; the carrying value of assets that are neither past due nor impaired; and the ageing of assets that are past due or impaired:

	2024 GBP'000	2023 GBP'000
By class of asset:		
Financial investments	14,378	15,628
Debt securities and other fixed income securities	196,176	204,268
Other Financial Investments	90,366	113,285
Assets arising from reinsurance contracts held	297,501	303,125
Assets arising from insurance contracts held	96	2,414
Cash and cash equivalents	48,668	19,923
Other assets	18,639	44,721
Total assets bearing credit risk	665,824	703,364
By credit rating:		
AAA	5,791	28,034
AA	128,591	95,225
A	114,020	94,162
BBB	50,310	98,717
Below BBB or not rated	367,112	387,226
Total assets bearing credit risk	665,824	703,364
Financial assets past due or impaired:		
Neither past due nor impaired	21,105	58,115
Past due less than 30 days	196	38
Past due 31 to 60 days	1,475	79
Past due 61 to 90 days	1,005	3,640
Past due more than 90 days	439	1,769
Total financial assets past due or impaired	24,220	63,641

Within the total financial assets past due or impaired, is a total impairment against insurance and reinsurance operations at 31 December 2024 of £26.9 million (2023: £24.0 million).

Internal credit risk refers to the internal reinsurance in place with the quota share arrangements with CatGen. The primary mitigation against intracompany credit risk is through the existing collateral trust in place on behalf of CWIL. CatGen's performance is monitored on a quarterly basis, the levels of collateral are monitored monthly and an exercise is performed annually to validate an internal rating for CatGen in the Catalina Internal Capital Model using a rating agency framework. This risk is anticipated to increase in the medium time horizon, due the planned Zurich Part VII transfer.

C.3.2 Credit Risk Exposures, Concentrations, Mitigations and Sensitivities

Credit risk relates to the possibility that the Company becomes exposed to losses occurring as a result of third parties and counterparties failing to fulfil their obligations. Credit risk on receivables is minimised by pursuing early commutation where possible and if economically beneficial, as well as ongoing monitoring of reinsurers for creditworthiness and ability to make payments as they arise.

The Company is also exposed to credit risk via its investment portfolio. Its investment guidelines stipulate that credit quality may not fall below a weighted average of A- across the portfolio. There are also specific concentration limits around individual obligors and around industry/sector exposures. The CIO is responsible for credit risk compliance reporting to the Board and the Risk Committee. Selected credit risk metrics and any breaches of the guidelines are reported to the Risk Committee.

The stress testing and sensitivity results cover both market and credit risks.

C.4 Liquidity Risk

C.4.1 Risk exposure

Liquidity risk is the risk that the Company cannot meet its obligations associated with financial liabilities as they fall due. The objective of liquidity risk management is to ensure that the Company has sufficient access to funds necessary to cover insurance claims and other financial obligations as they fall due. CWIL manages its liquidity risk by monitoring forecast and actual cash flows. Most of its assets are marketable securities which can be converted into cash when required.

C.4.2 Liquidity Risk Exposures, Concentrations, Mitigations and Sensitivities

CWIL manages liquidity risk through regular forecasting of expected cash flows. Considerations for liquidity management include analysis of asset and liability mean terms and durations.

Regular oversight of the Company's liquidity position is conducted by the CFO, Group Treasurer and/or CIO in conjunction with the Finance team. Regular reporting of assets encumbered by Letter of Credit or Trusts is supplied to the Board. In addition, a quarterly analysis of estimated time to liquidate assets from the portfolio is presented to the Risk Committee to establish exposure to illiquid positions.

The Company holds significant amounts of liquid investments and cash. Liquidity stress testing and sensitivity analysis is not undertaken given the considerable cash and cash equivalents held compared against the duration of liabilities.

The following table shows details of the expected maturity profile of the Company's undiscounted obligations with respect to its financial liabilities and estimated cash flows of recognised insurance liabilities.

	Less than 1 year	1 – 5 years	5+ years	Total
2024	GBP'000	GBP'000	GBP'000	GBP'000
Financial liabilities and claims outstanding				
Claims outstanding	43,448	148,639	273,683	465,770
Deposits received from reinsurers	3,825	13,087	24,097	41,009
Creditors arising out of reinsurance operations	7,655	-	-	7,655
Other creditors including taxation and social security	10,742	-	-	10,742
Accruals and deferred income	549	-	-	549
	66,219	161,726	297,780	525,725

2023	GBP'000	GBP'000	GBP'000	GBP'000
Financial liabilities and claims outstanding				
Claims outstanding	40,727	141,645	282,834	465,206
Deposits received from reinsurers	4,052	14,094	28,143	46,289
Creditors arising out of reinsurance operations	10,051	-	-	10,051
Other creditors including taxation and social security	1,932	-	-	1,932
Accruals and deferred income	464	-	-	464
	57,226	155,739	310,977	523,942

C.5 Operational Risk

C.5.1 Risk exposure

Operational risk relates to the possibility that the Company becomes exposed to losses occurring as a result of failures within their internal systems and processes. The Company's operational risk mainly stems from people, process or technology failures. Close collaboration with the functional areas, for example through the discussion of operational risks at Executive Committee Operating Review meetings, allows the CRO and management to identify any vulnerabilities before they adversely affect business process.

C.6 Other Material Risks

Strategic Risk

The strategy of the Catalina Group continues to be growth through non property and casualty opportunities and the maintenance of existing property and casualty businesses including CWIL. The directors focus is on ensuring the sufficiency of resources and capability to manage the business through the liability run-off.

Inflation Risk

The sharp increases in inflation experienced post covid has continued to recede in 2024. Inflation is generally measured as a year on year % change, with the UK Consumer Price Index (CPI) rising by 2.5%, UK wage inflation rising by 5.9% and the US CPI rising by 2.9% in the 12 months to December 2024 (in the 12 months to December 2023, the UK CPI rose by 4.0%, UK wage inflation was 11.8% and the US CPI rose by 3.4%). The potential impacts of inflation on the Company are on the cost of settling claims, investment returns and operating expenses.

Active monitoring and mitigation of inflation risk will continue in 2025 with particular emphasis on social inflation within the US for the Company's US exposures and the general appropriateness of inflation assumptions used in reserving. The Company's asset-liability matching programme and strategic asset allocation are reviewed annually and includes consideration of the expected impacts of inflation.

Cyber Security Risk

Cyber threats are expected to persist in 2025, fuelled by access to AI tools, increasing levels of sophistication are anticipated. High profile cyber security incidents will continue to impact corporates globally. Email compromise remains amongst the top threats to financial services organisations and in the second half of 2024 industry reports suggested an increase in insider threat related incidents.

For the Company, 2024 was a transformative year in the Information Security space with notable uplifts in maturity across a variety of capabilities including: the deployment and embedding of a 24/7 Security Operations Centre, the baselining and standardisation of the security requirements and governance artefacts (policies, standards and practice guides) and a number of initiatives which improved our security posture thematically delivered through a Technology Transformation and Vendor Risk Management programme. These capability uplifts are underpinned by an increased security awareness across the organisation as staff continue to be engaged through targeted training, phishing simulation exercises and frequent communication.

Geopolitical Risk

Geopolitical risks continued in 2024 as the Russia-Ukraine and Middle East conflicts persisted and uncertainty resulted from the outcome of the United States presidential election. These have exacerbated the issues in a global economy that is still recovering from the fallout of the COVID-19 pandemic, contributing to significant market volatility. The Directors will continue to be vigilant in monitoring this risk, with particular focus on the impact of tariffs on the global economy in 2025 and through monitoring geographical concentrations of its investment portfolio

Emerging Risk

The Company has an established Committee to monitor emerging risks to ongoing operations. A collection of torts relevant to Catalina are monitored and reviewed, including sexual abuse, CTE (brain injuries), PFAS (forever chemicals) and climate change to assess their implications to the business. In addition, a horizon scan of relevant regulatory, legislative, relevant court cases and other industry body issues are monitored to assess their likelihood and impact on the UK business if they were to crystallise. Updates on the emerging risk landscape are provided to the UK Board Risk Management Committee twice a year.

Sustainability Risk

The Board has responsibility for considering climate-related matters and risks. Actively researching and integrating ESG factors into Catalina's broader risk management framework as part of sustainability risk monitoring is becoming more important. Environmental risks are managed through the following:

- *Environmental, Social and Governance ("ESG")*

The Company has adopted the broader Catalina Group ESG policy and, through this, established a UK ESG Committee.

The UK ESG Committee is tasked to promote the intentions of the ESG policy and the need to engage in wider society by playing a part in ensuring consideration of the environment in business decisions, including for example where to invest and how to reduce the carbon footprint. It also considers employee wellbeing and investing in its employees to educate, support and empower and is committed to a responsible culture that supports employee inclusion and maintains rigorous standards of governance.

- *Investment Decisions*

The Company has reviewed its approach to investments in light of the ESG policy. This is driven by a conviction that ESG considerations are increasingly relevant as a performance driver. A responsible investment policy has been designed for the broader Catalina Group and aggregate exposures to carbon intensive industries are monitored.

D. Valuation for Solvency Purposes

This section provides a description of the bases, methods and other assumptions used in the valuation of assets, technical provisions and other liabilities on the Solvency II balance sheet. Details of the Solvency II valuation basis can be found in the notes in sections D.1, D.2 and D.3. Any alternative methods for valuation are found in D.4.

CWIL prepares its financial statements under UK GAAP. For the majority of the Company's assets and liabilities other than technical provisions, their financial statements valuations are consistent with the Solvency II basis of valuation.

D.1 Assets

Assets are recognised in line with the requirements of Solvency II regulations, the basis of which is the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction.

In the table below, the Solvency II value of each material class of assets are set out together with the equivalent financial statements valuation:

Solvency II Classification	Solvency II Value 2024 GBP'000	Valuation Differences 2024 GBP'000	Reclassified UK GAAP 2024 GBP'000	Financial Statements Value 2024 GBP'000	Note
Deferred tax assets	8,291	-	-	8,291	1
Equities – unlisted	15,010	-	(5)	15,005	2
Government bonds	80,076	-	(315)	79,761	3
Corporate bonds	114,102	-	2,028	116,130	4
Collateralised securities	286	-	(1)	285	5
Collective investment undertakings	45,027	-	(142)	44,885	6
Derivatives	181	-	-	181	7
Loans and mortgages	28,398	(5)	(4,797)	23,596	8
Deposits other than cash equivalents	21,077	-	-	21,077	9
Reinsurance recoverables	216,724	69,718	-	286,442	10
Deposits to cedants	2,304	-	-	2,304	11
Insurance and intermediaries receivables	96	-	-	96	12
Reinsurance receivables	11,059	-	-	11,059	13
Receivables (trade not insurance)	3,609	1,183	-	4,792	14
Cash and cash equivalents	48,668	-	-	48,668	15
Other assets	-	20	3,232	3,252	16
Total assets	594,908	70,916	-	665,824	

Solvency II Classification	Solvency II Value 2023 GBP'000	Valuation Differences 2023 GBP'000	Reclassified UK GAAP 2023 GBP'000	Financial Statements Value 2023 GBP'000	Note
Deferred tax assets	8,291	-	-	8,291	1
Equities - unlisted	17,727	-	-	17,727	2
Government bonds	86,532	-	1,091	87,623	3
Corporate bonds	119,764	-	(3,446)	116,318	4
Collateralised securities	328	-	(1)	327	5
Collective investment undertakings	95,395	-	(161)	95,234	6
Derivatives	854	-	-	854	7
Loans and mortgages	-	-	-	-	8
Deposits other than cash equivalents	15,099	-	(1)	15,098	9
Reinsurance recoverables	221,330	62,739	-	284,069	10
Deposits to cedants	7,612	-	-	7,612	11
Insurance and intermediaries receivables	2,414	-	-	2,414	12
Reinsurance receivables	19,056	-	-	19,056	13
Receivables (trade not insurance)	32,176	1,704	-	33,880	14
Cash and cash equivalents	12,311	-	-	12,311	15
Other assets	-	32	2,518	2,550	16
Total assets	638,889	64,475	-	703,364	

Notes to Asset Valuation Basis

Where financial assets are valued using active markets, an active market means quoted prices are readily and regularly available and those prices represent actual and regularly occurring market transactions on an arm's length basis.

1. Deferred tax assets

For Solvency II purposes, deferred tax balances are only recognised in relation to all assets and liabilities that are recognised for Solvency II own funds and only where it is probable that future taxable profits will lead to the realisation of the asset. Under UK GAAP, CWIL recognises a deferred tax asset of £8.3m (2023: £8.3m) arising from carried forward tax losses and capital allowances in excess of depreciation. A corresponding deferred tax asset of £8.3m (2023: £8.3m) is recognised in the Company's Solvency II balance sheet.

2. Equities - unlisted

Unlisted equities represent holdings in non-listed legal entities that invest in real estate. As these entities are not listed on a recognised exchange, fair value has been determined by reference to the net asset value of the entities. The net asset values are largely determined using either: acquisition price where there is reasonable proximity between acquisition and reporting date; or by commercial real estate valuations performed by Chartered Surveyors (members of the Royal Institution of Chartered Surveyors). The valuations are prepared by considering the aggregate for the net annual rents receivable and, where relevant, associated costs.

3. Government bonds

Government bonds are valued using prices provided by external pricing vendors where these valuations are mostly based on quoted prices in active markets that are readily and regularly available. Where not readily available, pricing vendors will often determine prices by consolidating prices of recent trades for identical or similar securities obtained from a panel of market makers into a

composite price. The pricing service may adjust for the elapsed time from a trade date to the valuation date to take into account available market information. Lacking recently reported trades, pricing vendors will use modelling techniques to determine a security price. The valuation basis for Solvency II is consistent with the CWIL financial statements basis.

The Solvency II valuation includes accrued interest of £703k (2023: £484k). In the CWIL financial statements, accrued interest is included within "Other Debtors".

As at 31 December 2024, £388k (2023: £1,575k) of agency bonds are reported as Government Bonds in the CWIL financial statements and reclassified to Corporate Bonds for Solvency II reporting purposes.

4. Corporate bonds

Corporate bonds are valued using prices provided by external pricing vendors where these valuations are mostly based on quoted prices in active markets that are readily and regularly available. Where not readily available, pricing vendors will often determine prices by consolidating prices of recent trades for identical or similar securities obtained from a panel of market makers into a composite price. The pricing service may adjust for the elapsed time from a trade date to the valuation date to take into account available market information. The valuation basis for Solvency II is consistent with the CWIL financial statements basis.

The Solvency II valuation includes accrued interest of £2,053k (2023: £1,871k). In the CWIL financial statements, accrued interest is included within "Other Debtors".

As at 31 December 2024, £388k (2023: £1,575k) of agency bonds are reported as Government Bonds in the CWIL financial statements and reclassified to Corporate Bonds for Solvency II reporting purposes. £4,469k (2023: £nil) of corporate loans are reported as Corporate Bonds in the CWIL financial statements and reclassified to Loans and Mortgages for Solvency II reporting purposes.

5. Collateralised securities

Collateralised securities represent residential and commercial backed mortgages and asset backed securities. Their fair values are determined based on either quoted prices in active markets for similar assets or liabilities, or quoted prices in markets that are not active or for which all significant inputs are observable, directly or indirectly. The valuation basis for Solvency II is consistent with the Company financial statements basis.

The Solvency II valuation includes accrued interest of £1k (2023: £1k). In the CWIL financial statements, accrued interest is included within "Other Debtors".

6. Collective investment undertakings

Collective investments undertakings represent holdings in non-listed third-party investment vehicles. These are not listed on a recognised exchange hence fair value is determined via direct or indirect observable data which is generally recent transactions in the same or similar instruments. These include holdings in private equity and debt funds where look through information and valuation is sourced by the fund based on direct and indirect observable data. This is considered to represent fair value for Solvency II and CWIL financial statements purposes.

The Solvency II valuation includes accrued interest of £142k (2023: £161k). In the CWIL financial statements, accrued interest is included within "Other Debtors".

7. Derivatives

The fair value of derivatives for both Solvency II and financial statements purposes is determined using readily available foreign currency exchange rates to value the open contracts at the reporting date. The difference in value between the reporting date and contract maturity date is recognised as either an asset or liability.

8. Loans and mortgages

Commercial Mortgage Loans (CML) are any loan secured by a commercial property. The Transaction consists of financing from a lender to a borrower secured by a mortgage (or deed of trust) where the borrower pledges the property as collateral. The mortgage may be taken by the lender and sold at foreclosure to satisfy repayment of the debt in the event of default (nonpayment) by the borrower. Valuations for CML are primarily determined by specialist third party independent valuation firms.

As at 31 December 2024, £4,469k (2023: £nil) of Private credit are reported as corporate bonds in the CWIL financial statements and reclassified to Loans and mortgages for Solvency II reporting purposes.

The Solvency II valuation includes accrued interest of £333k (2023: £1k). In the CWIL financial statements, accrued interest is included within "Other Debtors".

9. Deposits other than cash equivalents

Deposits other than cash equivalents are deposits with credit institutions which are not readily convertible to cash, i.e., are not accessible in under 24 hours. For both Solvency II and Company financial statements purposes, fair value is the value of the deposit holding.

The Solvency II valuation includes accrued interest of £nil (2023: £1k). In the CWIL financial statements, accrued interest is included within "Other Debtors".

10. Reinsurance recoverables

For Solvency II purposes, the fair value of reinsurers' share of technical provisions is determined after applying discounting, whereas in the CWIL financial statements the gross technical provisions and related reinsurers' share of technical provisions are undiscounted. Discounting for fair value purposes uses the relevant risk-free yield curves for each currency. For a fuller explanation of the valuation adjustment of £69,718k (2023: £62,739k), refer Section D.2 Technical Provisions.

11. Deposits to cedants

Deposits to cedants are a requirement of certain reinsurance contracts. These amounts are provided as cash and considered to represent fair value. Determination of fair value for deposits with cedants for Solvency II and CWIL financial statements is after consideration of impairment of any amounts receivable. The valuation basis for Solvency II is consistent with the CWIL financial statements basis.

12. Insurance and intermediaries receivables

Insurance and intermediaries receivables of £96k (2023: £2,414k) are measured at amortised cost for Company financial statements purposes. For Solvency II purposes, given that the level of discount or premium held against the principal receivable is immaterial, amortised cost is considered to materially reflect fair value.

13. Reinsurance receivables

The valuation basis for reinsurance receivables within the CWIL financial Statements and Solvency II balance sheet is undiscounted. Determination of fair value for Reinsurance Receivables for Solvency II and financial statements is after consideration of impairment of any amounts receivable.

14. Receivables – trade not insurance

For Solvency II purposes, the fair value of trade receivables are the amounts due after consideration of any impairment. The valuation basis for Solvency II is consistent with the CWIL financial statements basis.

Trade receivables, comprise an inter-company debt representing future administration fees recoverable from CatGen. These amounts are in addition to the terms of the 80% reinsurance protection afforded under the CWIL quota share arrangement. This amount is due over a period that matches the run-off of technical provisions. For Solvency II purposes, the fair value of the receivable has been discounted at the risk-free rate, resulting in a valuation adjustment of £1,183k (2023: £1,704) compared to the CWIL financial statements valuation.

15. Cash and cash equivalents

Cash and cash equivalents comprise cash balances and call deposits and are readily accessible. There are no restrictions on accessing cash or cash equivalents, hence fair value under Solvency II is the value of the cash holding.

16. Other assets

Prepayments of £20k (2023: £32k) are deemed to have nil fair value for Solvency II purposes.

Accrued interest of £3,232k (2023: £2,518k) has been reclassified to the respective investment classes on the Solvency II balance sheet (government bonds, corporate bonds, collective investment undertakings and deposits other than cash equivalents).

D.2 Technical provisions

Technical provisions comprise the best estimate of liabilities and risk margin according to Articles 75 to 86 of the Solvency II regulations.

Best estimate liabilities (“BEL”) refer to the sum of claims provision and premium provision:

- The claims provision is the discounted best estimate of future cashflows relating to events prior to the valuation date, including claims which have not yet been reported. The cash flows include net claims, future expenses incurred to settle these claims and future premiums receivable in relation to the past exposure. The corresponding reinsurers’ share of gross claims technical provisions, disclosed as “reinsurance recoverables” in Section D.1, is valued using the same techniques as the gross claims technical provisions.
- The premium provision is the discounted best estimate of future cashflows relating to claim events that have not yet occurred but that are covered by contracts in existence at the valuation date. The cash flows include net claims, future expenses incurred to settle these claims and future premiums receivable in relation to future claims events. The run-off nature of the Company means that there are no future exposures at the valuation date and therefore no premium provision.

The risk margin is an estimate of the amount that a third party taking on the insurance obligations of a company would require over and above BEL. The risk margin is calculated using a cost of capital approach. For year end 2024 and 2023, the cost of capital rate is 4%, following the implementation of The Insurance and Reinsurance Undertakings (Prudential Requirements) Regulations 2023 published by the HM Treasury.

The following table quantifies the total gross technical provisions on a Solvency II basis at 31 December 2024. The lines of business can represent direct, proportional reinsurance or non-proportional reinsurance liabilities.

	Gross Best Estimate 2024 GBP'000	Risk Margin 2024 GBP'000	Solvency II Provisions 2024 GBP'000	Financial Statement Value 2024 GBP'000
By material line of business:				
Direct Insurance				
Marine, aviation and transport	3,331	141	3,472	4,761
Fire and other damage to property	7,882	334	8,216	15,723
Casualty	261,011	11,073	272,084	319,184
Proportional and Non-proportional Reinsurance				
Casualty	80,048	3,395	83,443	111,234
Marine, aviation and transport	804	34	838	2,723
Property	8,187	347	8,534	5,038
Annuities stemming from non-life insurance contracts	6,818	289	7,107	7,107
Total	368,081	15,613	383,694	465,770

	2023 GBP'000	2023 GBP'000	2023 GBP'000	2023 GBP'000
By material line of business:				
Direct Insurance				
Marine, aviation and transport	3,487	164	3,651	4,928
Fire and other damage to property	5,995	282	6,277	13,902
Casualty	274,226	12,916	287,142	326,011
Proportional and Non-proportional Reinsurance				
Casualty	77,850	3,667	81,517	104,685
Marine, aviation and transport	782	37	819	2,757
Property	8,867	418	9,285	4,587
Annuities stemming from non-life insurance contracts	7,961	375	8,336	8,336
Total	379,168	17,859	397,027	465,206

The Company has adopted a deterministic approach to estimating the BEL by making the following adjustments to the UK GAAP reserves in its financial statements:

Increase /(decrease)	2024 GBP'000	2023 GBP'000
Event Not In Data (ENID) included in Solvency II TPs	13,844	13,941
Expense Provision increase included in Solvency II TPs	15,799	15,514
Discounting at the Risk Free Rate	(127,332)	(115,493)
Risk Margin	15,613	17,859
Total Solvency II Liability Adjustments	(82,076)	(68,179)

The total of the Solvency II liability adjustments above result in the gross BEL on the Solvency II balance sheet being £82,076k lower (£68,179k lower) than the gross technical provisions of £465,770k (2023: £465,206k) in the CWIL financial statements.

The main risks and uncertainties associated with the technical provisions relate to the following:

- Claims provisions: there is an inherent uncertainty in estimating claims provisions for the eventual outcome of outstanding notified claims as well as estimating the value of claims yet to be reported;
- Events Not In Data ("ENID"): this is an adjustment to technical provisions which is designed to capture potential future claims that do not exist in the historical data used for GAAP reserves calculation. These claims are typically low frequency and high severity impact;
- Expense provisions: the estimation of the future costs of claims management involves uncertainty over factors such as number of claims and staff costs. The Solvency II expense provision has been determined with reference to an analysis of the latest business plan, and an underlying assumption that in the event of run-off, costs can be apportioned across the rest of the Catalina Group, with only essential activities maintained to support the CWIL liabilities; and
- Risk free rates: these rates are prescribed and provided by the Bank of England ("BoE").

CWIL's business model is to actively manage claims, including the closure of remaining claims portfolios through commutations. This results in a tendency for actual technical provisions to reduce more quickly than the BEL estimates. The investment portfolio will continue to be managed in a way that supports this approach.

D.3 Other liabilities

In the table below, the Solvency II value of each material class of liabilities other than technical provisions are set out together with the equivalent financial statements valuation:

Solvency II Classification	Solvency II Value 2024 GBP'000	Valuation Differences 2024 GBP'000	Reclassification Differences 2024 GBP'000	Financial Statements Value 2024 GBP'000	Note
Deposits from reinsurers	41,009	-	-	41,009	1
Derivative liabilities	100	-	-	100	2
Reinsurance payables	7,655	-	-	7,655	3
Payables (trade, not insurance)	11,191	-	-	11,191	3
	59,955	-	-	59,955	

Solvency II Classification	Solvency II Value 2023 GBP'000	Valuation Differences 2023 GBP'000	Reclassification Differences 2023 GBP'000	Financial Statements Value 2023 GBP'000	Note
Deposits from reinsurers	46,289	-	-	46,289	1
Derivative liabilities	139	-	-	139	2
Reinsurance payables	10,051	-	-	10,051	3
Payables (trade, not insurance)	2,257	-	-	2,257	3
Total Other Liabilities	58,736	-	-	58,736	

1. Deposits from Reinsurers

For CWIL financial statements purposes, deposits from reinsurers are measured at amortised cost of £41,009k (2023: £46,289k).

2. Derivatives

Derivative financial assets or liabilities are financial contracts whose fair value is determined on a market basis by reference to underlying interest rate, foreign exchange rate, equity or commodity instrument or indices. Derivative assets and liabilities are presented separately within Total Assets and Total Liabilities respectively. The valuation basis for Solvency II is consistent with the CWIL financial statements basis.

3. Insurance and Intermediaries Payable, Reinsurance Payables and Payables – Trade not Insurance

The valuation of these payables under Solvency II is consistent with the CWIL financial statements basis.

D.4 Alternative methods for valuation

Unless otherwise explained in Sections D1-D3, no other alternative methods for valuation are used.

D.5 Any other information

Not applicable.

E. Capital Management

The Company manages its capital to ensure a prudent level of own funds is available to meet the solvency requirements and enable future policyholder obligations to be met. A Capital Management Plan is prepared for CWIL annually, which forms part of the ORSA, and which demonstrates capital adequacy is expected over a three-year planning horizon.

There have been no material changes to the objectives, policies or processes for managing own funds were made over the period. The Company was in compliance with the solvency capital requirements of the PRA throughout the year.

E.1 Own funds

Own funds represent the Company's ordinary share capital and reconciliation reserve. The Company's ordinary share capital is categorised as Tier 1 own funds, as it comprises a single class of shares which are unrestricted. Dividends can be cancelled after they have been declared, and there are no restrictions on the repayment of capital, other than being subject to ongoing regulatory approval.

As at 31 December 2024, all of the Company's own funds are categorised as Tier 1, with the exception of its net deferred tax assets which are categorised as Tier 3 own funds.

	Tier 1 2024 GBP'000	Tier 2 2024 GBP'000	Tier 3 2024 GBP'000	Total 2024 GBP'000
Basic own funds				
Ordinary share capital	158,000	-	-	158,000
Reconciliation reserve	(15,032)	-	-	(15,032)
Net deferred tax assets	-	-	8,291	8,291
Total basic own funds	142,968	-	8,291	151,259
	2023 GBP'000	2023 GBP'000	2023 GBP'000	2023 GBP'000
Basic own funds				
Ordinary Share Capital	158,000	-	-	158,000
Reconciliation Reserve	16,835	-	-	16,835
Net deferred tax assets	-	-	8,291	8,291
Total basic own funds	174,835	-	8,291	183,126

The following shows the movement in the year in Own Funds:

Reconciliation between Opening and Closing own funds	2024 GBP'000	2023 GBP'000
Opening own funds	183,126	188,570
Movement in financial statements - retained deficit	(39,323)	(19,600)
Movement in Solvency II asset valuation differences	(6,441)	24,258
Movement in Solvency II liability valuation differences	13,897	(10,102)
Closing Own Funds	151,259	183,126

Within own funds, the reconciliation reserve represents the retained earnings and capital reserves as reported in the Company's financial statements, less valuation differences between the Company's financial statements and its Solvency II balance sheet.

The components of the reconciliation reserve as at 31 December are:

Reconciliation Reserve Components	2024 GBP'000	2023 GBP'000	Movement GBP'000
Capital reserve per financial statements	93,160	93,160	-
Retained deficit per financial statements	(111,061)	(71,738)	(39,323)
Solvency II asset valuation differences – refer Section D.1	(70,916)	(64,475)	(6,441)
Solvency II liability valuation differences – refer Section D.2	82,076	68,179	13,897
Net deferred tax assets classified as Tier 3 own funds	(8,291)	(8,291)	-
Total Reconciliation Reserve	(15,032)	16,835	(31,867)

The eligibility of own funds to cover the Solvency Capital Requirement (“SCR”) and Minimum Capital Requirement (“MCR”) depends on the tiering levels attaching to the own fund item.

As at 31 December 2024, all the relevant eligibility criteria for Tier 1 and Tier 3 own funds were met in respect of the SCR and MCR:

- Eligible tier 1 items shall be at least 50% of the SCR;
- Eligible tier 3 items shall be no more than 15% of the SCR; and
- Eligible tier 1 items shall be at least 80% of the MCR.

Tier 3 own funds are not eligible to cover the MCR.

	Tier 1 2024 GBP'000	Tier 2 2024 GBP'000	Tier 3 2024 GBP'000	Total 2024 GBP'000
Available and eligible own funds				
Total available own funds to meet the SCR	142,968		8,291	151,259
Total available own funds to meet the MCR	142,968			142,969
Total eligible own funds to meet the SCR	142,968		8,291	151,259
Total eligible own funds to meet the MCR	142,968			142,968
SCR				74,242
MCR				18,561
Ratio of Eligible own funds to SCR				204%
Ratio of Eligible own funds to MCR				770%

	Tier 1 2023 GBP'000	Tier 2 2023 GBP'000	Tier 3 2023 GBP'000	Total 2023 GBP'000
Available and eligible own funds				
Total available own funds to meet the SCR	174,835	-	8,291	183,126
Total available own funds to meet the MCR	174,835	-	-	174,835
Total eligible own funds to meet the SCR	174,835	-	8,291	183,126
Total eligible own funds to meet the MCR	174,835	-	-	174,835
SCR				82,834
MCR				20,708
Ratio of Eligible own funds to SCR				221%
Ratio of Eligible own funds to MCR				844%

E.2 Solvency Capital Requirement and Minimum Capital Requirement

The Company currently uses the Standard Formula to calculate its SCR. The table below shows the breakdown of the Company's SCR by risk module:

	2024 GBP'000	2023 GBP'000
By risk module		
Market risk	29,703	38,977
Default risk	5,635	5,826
Life risk	79	95
Non-life risk	45,632	47,566
Basic SCR before diversification	81,049	92,464
Diversification benefits	(17,676)	(20,802)
Basic SCR	63,373	71,662
Operational risk	10,869	11,172
SCR	74,242	82,834

The individual SCR risk modules are discussed in more detail in Section C.

The main drivers of the SCR are the market risk and non-life reserve risk. As such, the main diversification in calculating the SCR also arises between market risk and reserve risk.

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

The Company has not used the duration-based equity risk sub-module in the calculation of the SCR.

E.4 Internal model

The Company calculates its SCR using the standard formula. No internal or partial internal model is used in the calculation of its SCR.

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

There has not been any non-compliance with the SCR or the MCR over the year nor is there expected to be any non-compliance with the SCR and MCR in the business planning period.

E.6 Any other information

None.

Appendix 1: Reporting templates

The quantitative reporting templates which form part of the Annual Regulatory Templates listed below are required to be published alongside the SFCR.

IR.02.01	Balance Sheet Information
IR.05.02	Information on Premiums, Claims and Expenses - by Country, applying the valuation and recognition principles used in the company's financial statements.
IR.12.01	Life and Health SLT Technical Provisions
IR.17.01	Information on non-life technical provisions by LOB
IR.19.01	Information on non-life insurance claims by LOB in the format of development triangles.
IR.23.01	Information on Own funds
IR.25.04	Information on the SCR using the Standard Formula
IR.28.01	Minimum Capital Requirement for the Entity

		Solvency II value	Statutory accounts value
		C0010	C0020
Assets			
Goodwill	R0010		
Deferred acquisition costs	R0020		
Intangible assets	R0030		
Deferred tax assets	R0040	8,290,809	8,290,809
Pension benefit surplus	R0050		
Property, plant & equipment held for own use	R0060	0	
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	275,758,276	272,859,003
Property (other than for own use)	R0080	0	
Holdings in related undertakings, including participations	R0090	0	
Equities	R0100	15,010,393	15,010,393
Equities - listed	R0110	0	0
Equities - unlisted	R0120	15,010,393	15,010,393
Bonds	R0130	194,463,560	191,706,243
Government Bonds	R0140	80,076,041	79,372,570
Corporate Bonds	R0150	114,101,509	112,048,470
Structured notes	R0160	0	0
Collateralised securities	R0170	286,009	285,203
Collective Investments Undertakings	R0180	45,027,076	44,885,120
Derivatives	R0190	180,739	180,739
Deposits other than cash equivalents	R0200	21,076,508	21,076,508
Other investments	R0210	0	
Assets held for index-linked and unit-linked contracts	R0220	0	
Amount to be included in TR0220 that is not derived from IR.06.02	TR0220		
Loans and mortgages	R0230	28,399,075	28,060,686
Loans on policies	R0240	0	
Loans and mortgages to individuals	R0250		
Other loans and mortgages	R0260	28,399,075	28,060,686
Reinsurance recoverables from:	R0270	216,723,860	286,441,535
Non-life and health similar to non-life	R0280	211,151,682	286,441,535
Life and health similar to life, excluding index-linked and unit-linked	R0315	5,572,178	
Life index-linked and unit-linked	R0340	0	
Deposits to cedants	R0350	2,303,515	2,303,515
Insurance and intermediaries receivables	R0360	96,175	96,175
Reinsurance receivables	R0370	11,058,650	11,058,650
Receivables (trade, not insurance)	R0380	3,608,761	4,774,042
Own shares (held directly)	R0390		
Amounts due in respect of own fund items or initial fund called up but not yet paid	R0400	0	
Cash and cash equivalents	R0410	48,667,572	48,667,572
Any other assets, not elsewhere shown	R0420		3,270,286
Total assets	R0500	594,906,693	665,822,273
Liabilities			
Technical provisions - total	R0505	383,693,702	465,770,120
Technical provisions - non-life	R0510	376,586,677	465,770,120
Technical provisions - life	R0515	7,107,024	
Best estimate - total	R0542	368,080,899	
Best estimate - non-life	R0544	361,263,065	
Best estimate - life	R0546	6,817,834	
Risk margin - total	R0552	15,612,803	
Risk margin - non-life	R0554	15,323,613	
Risk margin - life	R0556	289,190	
Transitional (TMTP) - life	R0565	0	
Other technical provisions	R0730		
Contingent liabilities	R0740		
Provisions other than technical provisions	R0750		
Pension benefit obligations	R0760		
Deposits from reinsurers	R0770	41,009,110	41,009,110
Deferred tax liabilities	R0780		
Derivatives	R0790	99,594	99,594
Debts owed to credit institutions	R0800		
Financial liabilities other than debts owed to credit institutions	R0810		
Insurance & intermediaries payables	R0820		
Reinsurance payables	R0830	7,654,680	7,654,680
Payables (trade, not insurance)	R0840	11,190,235	11,190,235
Subordinated liabilities	R0850	0	0
Subordinated liabilities not in Basic Own Funds	R0860		
Subordinated liabilities in Basic Own Funds	R0870	0	
Any other liabilities, not elsewhere shown	R0880		
Total liabilities	R0900	443,647,321	525,723,739
Excess of assets over liabilities	R1000	151,259,372	140,098,534

			Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
			C0010	C0020	C0030	C0040	C0050	C0060	C0070
			R0010						
			C0080	C0090	C0100	C0110	C0120	C0130	C0140
Premiums written	Gross - Direct Business	R0110	0						0
	Gross - Proportional reinsurance	R0120	0						0
	Gross - Non-proportional reinsurance	R0130	6,439						6,439
	Reinsurers' share	R0140	6,496						6,496
	Net	R0200	-57	0	0	0	0	0	-57
Premiums earned	Gross - Direct Business	R0210	6,439						6,439
	Gross - Proportional reinsurance	R0220							0
	Gross - Non-proportional reinsurance	R0230	6,439						6,439
	Reinsurers' share	R0240	6,496						6,496
	Net	R0300	6,383	0	0	0	0	0	6,383
Claims incurred	Gross - Direct Business	R0310	398,820,265						398,820,265
	Gross - Proportional reinsurance	R0320	0						0
	Gross - Non-proportional reinsurance	R0330	136,759,596						136,759,596
	Reinsurers' share	R0340	296,694,315						296,694,315
	Net	R0400	238,885,546	0	0	0	0	0	238,885,546
Net expenses incurred			R0550	12,866,789					12,866,789

		Non-life annuities	Total life and health
Best Estimate		C0040	C0070
Gross Best Estimate	R0030	6,817,834	6,817,834
Gross Best Estimate (direct business)	R0025	0	0
Gross Best Estimate (reinsurance accepted)	R0026	6,817,834	6,817,834
Total recoverables from reinsurance/SPV and Finite Re before the adjustment for expected losses	R0040	5,639,024	5,639,024
Recoverables from reinsurance (except SPV and Finite Re) before adjustment for expected losses	R0050	5,639,024	5,639,024
Recoverables from SPV before adjustment for expected losses	R0060		0
Recoverables from Finite Re before adjustment for expected losses	R0070		0
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses	R0080	5,572,178	5,572,178
Best estimate minus recoverables from reinsurance/SPV and Finite Re	R0090	1,245,656	1,245,656
Risk Margin	R0100	289,190	289,190
Amount of the transitional on Technical Provisions			
Transitional Measure on Technical Provisions	R0180	0	0
TMTP - risk margin	R0140		0
TMTP - best estimate dynamic component	R0150		0
TMTP - best estimate non-dynamic component	R0160		0
TMTP - amortisation adjustment	R0170		0
Technical provisions - total	R0200	7,107,024	7,107,024
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0210	1,534,846	1,534,846
Surrender value	R0300		
Nominal value of units	R0302		
Matching value of units	R0304		
Best estimate subject to transitional of the interest rate	R0310		0
Technical provisions without transitional on interest rate	R0320		0
Best estimate subject to volatility adjustment	R0330		0
Technical provisions without volatility adjustment and without other transitional measures	R0340		0
Best estimate subject to matching adjustment	R0350		0
Technical provisions without matching adjustment and without all the others	R0360		0

[illegible]

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds						
Ordinary share capital (gross of own shares)	R0010	158,000,000	158,000,000		0	
Share premium account related to ordinary share capital	R0030	0	0		0	
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	0	0		0	
Subordinated mutual member accounts	R0050	0		0	0	0
Surplus funds	R0070	0	0			
Preference shares	R0090	0		0	0	0
Share premium account related to preference shares	R0110	0		0	0	0
Reconciliation reserve	R0130	-15,031,437	-15,031,437			
Subordinated liabilities	R0140	0		0	0	0
An amount equal to the value of net deferred tax assets	R0160	8,290,809				8,290,809
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0	0	0	0	0
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Total basic own funds	R0290	151,259,372	142,968,563	0	0	8,290,809
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	0				
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0				
Unpaid and uncalled preference shares callable on demand	R0320	0				
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0				
Letters of credit and guarantees	R0340	0				
Letters of credit and guarantees other	R0350	0				
Supplementary members calls	R0360	0				
Supplementary members calls - other	R0370	0				
Other ancillary own funds	R0390	0				
Total ancillary own funds	R0400	0			0	0
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	151,259,372	142,968,563	0	0	8,290,809
Total available own funds to meet the MCR	R0510	142,968,563	142,968,563	0	0	
Total eligible own funds to meet the SCR	R0540	151,259,372	142,968,563	0	0	8,290,809
Total eligible own funds to meet the MCR	R0550	142,968,563	142,968,563	0	0	
SCR	R0580	74,242,249				
MCR	R0600	18,560,562				
Ratio of Eligible own funds to SCR	R0620	2.0374				
Ratio of Eligible own funds to MCR	R0640	7.7028				

		C
Reconciliation reserve		C0060
Excess of assets over liabilities	R0700	151,259,372
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Deductions for participations in financial and credit institutions	R0725	
Other basic own fund items	R0730	166,290,809
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	-15,031,437

IR.25.04.01 - Solvency Capital Requirement

		C
Rows		C0010
Net of loss-absorbing capacity of technical provisions		
Market risk	R0140	29,703,080
Interest rate risk	R0070	12,766,466
Equity risk	R0080	11,213,088
Property risk	R0090	6,200,979
Spread risk	R0100	11,269,491
Concentration risk	R0110	3,825,659
Currency risk	R0120	2,172,265
Other market risk	R0125	0
Diversification within market risk	R0130	-17,744,869
Counterparty default risk	R0180	5,635,020
Type 1 exposures	R0150	5,574,791
Type 2 exposures	R0160	79,974
Other counterparty risk	R0165	0
Diversification within counterparty default risk	R0170	-19,745
Life underwriting risk	R0270	79,322
Total health underwriting risk	R0320	0
Non-life underwriting risk	R0370	45,631,801
Non-life premium and reserve risk (ex catastrophe risk)	R0330	45,631,801
Non-life catastrophe risk	R0340	0
Lapse risk	R0350	0
Other non-life underwriting risk	R0355	0
Diversification within non-life underwriting risk	R0360	0
Intangible asset risk	R0400	0
Operational and other risks	R0430	10,868,572
Operational risk	R0422	10,868,572
Other risks	R0424	0
Total before all diversification	R0432	109,701,551
Total before diversification between risk modules	R0434	91,917,796
Diversification between risk modules	R0436	-17,675,547
Total after diversification	R0438	74,242,249
Loss-absorbing capacity of technical provisions	R0440	
Loss-absorbing capacity of deferred taxes	R0450	0
Other adjustments	R0455	0
Solvency capital requirement including undisclosed capital add-on	R0460	74,242,249
Disclosed capital add-on - excluding residual model limitation	R0472	
Disclosed capital add-on - residual model limitation	R0474	
Solvency capital requirement including capital add-on	R0480	74,242,249
Undisclosed capital add-on - residual model limitation	R0482	
Capital add-on	R0484	0
Biting interest rate scenario	R0490	Increase
Biting life lapse scenario	R0495	

IR.28.01.01 - Minimum Capital Requirement - Only life or only non-life activity

		MCR components
		C0010
MCRNL Result	R0010	17,108,106

		Background information	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Motor vehicle liability insurance and proportional reinsurance	R0050	891,841	0
Marine, aviation and transport insurance and proportional reinsurance	R0070	960,331	0
Fire and other damage to property insurance and proportional reinsurance	R0080	1,783,630	0
General liability insurance and proportional reinsurance	R0090	126,255,144	0
Credit and suretyship insurance and proportional reinsurance	R0100	9,284	0
Non-proportional casualty reinsurance	R0150	18,466,950	3,311
Non-proportional marine, aviation and transport reinsurance	R0160	7,037	0
Non-proportional property reinsurance	R0170	1,737,165	0

		c
		C0040
MCRL Result	R0200	26,159

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Other life (re)insurance and health (re)insurance obligations	R0240	1,245,656	
Total capital at risk for all life (re)insurance obligations	R0250		

		c
		C0070
Linear MCR	R0300	17,134,264
SCR	R0310	74,242,249
MCR cap	R0320	33,409,012
MCR floor	R0330	18,560,562
Combined MCR	R0340	18,560,562
Absolute floor of the MCR	R0350	3,500,000
Minimum Capital Requirement	R0400	18,560,562