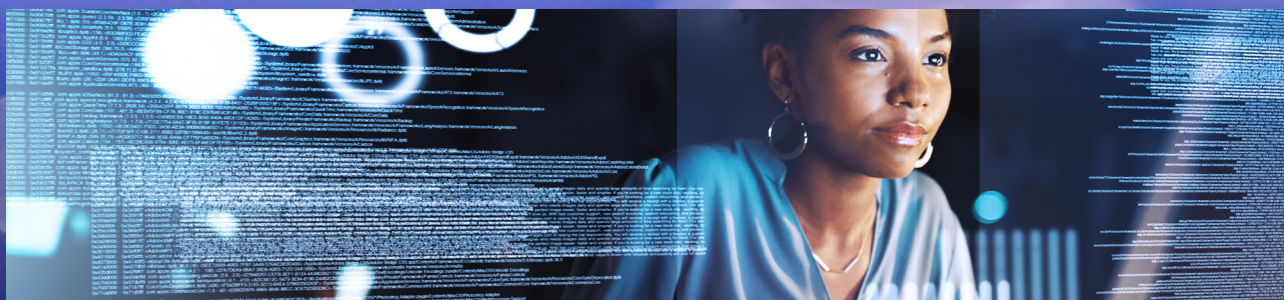


# Brit Reinsurance (Bermuda) Limited

## Financial Condition Report

### Year ending 31 December 2021



# BRIT

writing the future

## Contents

<b>Executive Summary</b> .....	<b>4</b>
<b>A. Business and Performance</b> .....	<b>6</b>
A.1 Name of the insurer .....	6
A.2 Name and contact details of the insurance supervisor .....	6
A.3 Name and contact details of the approved auditor .....	6
A.4 Ownership details .....	6
A.5 Group structure .....	7
A.6 Insurance business written by business segment and by geographical region during the reporting period .....	7
A.7 Investment performance .....	8
A.8 Material income and expenses during the reporting period .....	9
A.9 Other material information .....	10
<b>B. Governance Structure</b> .....	<b>11</b>
B.1 Board and Senior Executive .....	11
B.2 Fit and proper requirements .....	13
B.3 Risk management and solvency assessment .....	16
B.4 Internal control system .....	18
B.5 Internal Audit function .....	19
B.6 Actuarial function .....	20
B.7 Outsourcing .....	20
B.8 Other information .....	21
<b>C. Risk profile</b> .....	<b>22</b>
C.1 Material risks the Company is exposed to .....	22
C.2 Insurance Credit Risk (reinsurers and premium debtors) .....	23
C.3 How Risks are mitigated .....	25
C.4 Material risk concentrations .....	28
C.5 Investments in accordance with the prudent person principle .....	28
C.6 Stress and scenario testing .....	29
C.7 Other information .....	29
<b>D. Valuation for solvency purposes</b> .....	<b>30</b>
D.1 Valuation bases, assumptions and methods used to derive the value of assets under the EBS framework .....	30
D.2 Valuation bases, assumptions and methods used to derive the value of Net Technical Provisions under the EBS framework .....	30
D.3 Description of recoverables from reinsurance contracts .....	31

D.4	Valuation bases, assumptions and methods used to derive the value of other liabilities under the EBS framework .....	32
D.5	Other information .....	32
<b>E.</b>	<b>Capital management .....</b>	<b>33</b>
E.1	Eligible Capital and Regulatory Capital Requirements .....	33
<b>F.</b>	<b>Subsequent Event .....</b>	<b>35</b>
	<b>Declaration Statement.....</b>	<b>36</b>
	<b>Appendix I – Abbreviated Group Structure.....</b>	<b>37</b>



# Executive Summary

## Purpose of report

The purpose of the report is to provide additional information, over and above that contained in the annual financial statements, to policyholders and other stakeholders to enable them to understand the performance, governance structure, risk profile, solvency and capital position of Brit Reinsurance (Bermuda) Limited (Brit Re or the Company) as at 31 December 2021.

## Basis of preparation

The Financial Condition Report (FCR) has been prepared in accordance with Schedule I of the Insurance (Public Disclosure) Rules 2015 of Bermuda, following the structure and guidelines contained therein.

All figures provided in this report are in United States dollars, the functional currency of the Company.

## Report overview

In summary, the FCR contains the following information:

### Business and performance

This section contains details of the organisational structure, insurance business activities and financial performance of the Company.

The principal activity of the Company is that of underwriting reinsurance business for Brit Limited, which is a subsidiary of Fairfax Financial Holdings Limited. Brit Re also writes a portfolio of third party casualty treaty and property treaty business. For all of these activities the Company holds a Class 3B licence issued by the Bermuda Monetary Authority.

The result on ordinary activities for the year ended 31 December 2021 before tax was a profit of \$187.6m (2020: profit \$0.5m). The Company's result for 2021 reflects a return on investments of \$100.6m and an underwriting profit of \$89.9m. The 2021 combined ratio was 64.5% (2020: 103.3%).

Effective from 1 October 2021, Brit has completed a loss portfolio reinsurance contract (LPT) agreement with RiverStone Managing Agency Limited (for and on behalf of Lloyd's Syndicate 3500) for a legacy portfolio of discontinued classes of business underwritten by Syndicate 2987 at Lloyd's. The transaction sees RiverStone's Syndicate 3500 indemnify Brit against potential adverse development in respect of net liabilities valued at approximately \$380.0m (Brit Re share approx. \$71.0m). RiverStone will assume all claims handling responsibility for the transferring business.

On 28 October 2021, AM Best affirmed Brit Re's Financial Strength Rating of A (Excellent), with a 'stable' outlook. This rating reflects Brit Re's balance sheet strength, which AM Best assessed as 'very strong'.

### Governance structure

This section contains details of the corporate governance, risk management and solvency self-assessment frameworks of the Company.

The Company is committed to high standards of corporate governance and has established and maintained effective systems of governance that provide for sound and prudent management. There is a clear and well-defined organisational structure with clear, consistent and documented lines of responsibility. The board of directors of the Company (the Board) and staff have the skills, knowledge

and expertise to fulfil their allocated responsibilities. The Company's information systems produce sufficient, reliable, consistent, timely and relevant information on all business activities, commitments assumed and risk exposures. Appropriate risk management, regulatory compliance, internal audit and actuarial functions are established and maintained. The system of governance is therefore considered proportionate to the nature, scale and complexity of the business.

### **Risk profile**

This section provides information regarding risk management for each of the principal risks faced by the Company.

The Company's activities expose it to a number of key risks which have the potential to affect its ability to achieve its business objectives. The most material risks relate to the Company's underwriting and investment operations.

The risks arising from any of the business activities are managed in line with the Risk Management Framework (RMF) set by the Board in order to protect policyholders and maximise shareholder value. This established framework covers all the risks surrounding the Company's past, present and, in particular, future activities.

### **Valuation for solvency purposes**

The Bermuda Monetary Authority's (BMA) Solvency II equivalent regulations require the Company to value assets and liabilities on a different basis to UK Generally Accepted Accounting Practice (GAAP), which are used to prepare the Company's financial statements, when assessing its solvency requirements. This section describes the main methods and assumptions used in the valuation.

### **Capital management**

The Company holds considerable capital in surplus of its regulatory requirements to maintain its ability to pay its policyholders even if extreme events materialise – at 31 December 2021, the Company had a GAAP solvency ratio of 172% (2020: 211%) of its regulatory target capital of \$612.3m (2020: \$514.4m) and an enhanced capital requirement ratio of 212% (2020: 255%) of its regulatory enhanced capital requirement of \$510.2m (2020: \$428.6m).

In addition to its regulatory requirements, the Company maintains an internal model to allow management to assess its capital requirements for its risk profile. The Company also holds considerable surplus capital over this management capital requirement.

### **Coronavirus (Covid-19) outbreak**

COVID-19 continues to have a significant impact on the insurance industry. During 2021, Brit Re's priorities have remained the safety of its employees and continuity of service to clients and brokers.

### **Russia invasion of Ukraine**

The Russia invasion of Ukraine is a cause for uncertainty. This uncertainty may have an impact on reinsurance claims impacting the Company or it may impact financial markets which could in turn have consequences on the valuation of the Company's investment portfolio. At this time, it is too early to make any informed assessments or judgements on what effect, or effects, that this may have on the Company. Management will continue to monitor developments closely.

## **A. Business and Performance**

### **A.1 Name of the insurer**

Brit Reinsurance (Bermuda) Limited

### **A.2 Name and contact details of the insurance supervisor**

Bermuda Monetary Authority

BMA House  
43 Victoria Street  
Hamilton, HM12  
Bermuda

Telephone: +1 441-295-5278

Email: info@bma.bm

### **A.3 Name and contact details of the approved auditor**

PricewaterhouseCoopers Ltd.

Washington House  
4th floor, 16 Church Street  
Hamilton, HM 11  
Bermuda

Telephone: + 1 441-295-2000

Email: pwc.bermuda@bm.pwc.com

### **A.4 Ownership details**

The Company's immediate shareholder is Brit Insurance Holdings Limited (BIHL), a company registered in England and Wales. BIHL is the principal intermediate holding company within the Brit Limited Group and a direct subsidiary of Brit Limited. The ultimate holding company is Fairfax Financial Holdings Limited.

As at 31 December 2021, the shares in the capital of Brit Limited are held by:

- (i) Fairfax Financial Holdings Limited (Fairfax): 86.2%; and
- (ii) OMERS Administration Corporation: 13.8%.

Fairfax is federally incorporated and domiciled in Ontario, Canada.

## A.5 Group structure

An abridged corporate structure is shown in Appendix I.

## A.6 Insurance business written by business segment and by geographical region during the reporting period

The following table summarises the premiums written by business segment for the year ended 31 December 2021 and the 2020 comparative.

Premiums (\$'m)	2021			2020		
	Non FAL	FAL	Total	Non FAL	FAL	Total
<b>Gross written premium</b>	215.4	63.3	<b>278.7</b>	237.2	71.5	<b>308.7</b>
<b>Net written premium</b>	206.9	63.3	<b>270.2</b>	237.0	71.5	<b>308.5</b>
<b>Portfolio weighting - % NEP</b>	75.0%	25.0%	<b>100%</b>	76.1%	23.9%	<b>100%</b>

[Source: 2021 Annual Report and Financial Statements]

The Company provides Funds at Lloyd's (FAL) to Brit UW Limited (BUWL), a Group company, through a reinsurance contract. The Company has also entered into various reinsurance agreements with Brit Syndicates Limited, as managing agent of Lloyd's Syndicate 2987.

The following table summarises the premiums written from the quota share and X/L contracts with Syndicate 2987, FAL contract with BUWL and third-party business written by the Company. Split by geographic location of insureds for the year ended 31 December 2021 and the 2020 comparative.

GWP (\$'m)	2021			2020		
	Non FAL	FAL	Total	Non FAL	FAL	Total
<b>UK</b>	<b>13.4</b>	<b>63.3</b>	<b>76.7</b>	<b>13.5</b>	<b>71.5</b>	<b>85.0</b>
<b>Europe</b>	<b>2.8</b>	<b>-</b>	<b>2.8</b>	<b>3.2</b>	<b>-</b>	<b>3.2</b>
<b>US</b>	<b>123.9</b>	<b>-</b>	<b>123.9</b>	<b>134.8</b>	<b>-</b>	<b>134.8</b>
<b>Rest of World</b>	<b>75.3</b>	<b>-</b>	<b>75.3</b>	<b>85.7</b>	<b>-</b>	<b>85.7</b>
<b>Total</b>	<b>215.4</b>	<b>63.3</b>	<b>278.7</b>	<b>237.2</b>	<b>71.5</b>	<b>308.7</b>

The non-FAL contracts are predominantly made up of a quota share with S2987 which has a worldwide coverage where insureds are located within the United Kingdom (UK), European Union (EU), United States of America (US) and Rest of the World regions. The FAL contract written by the Company protects Brit UW Limited, domiciled in the UK.

The Company also writes third party property treaty and casualty treaty business, which totalled \$9.1m (2020: \$4.3m) of gross written premium in 2021. (The coverage is primarily the United States of America). The property treaty is business fronted for Sussex Re Limited the Insurance Linked Security investment platform of Brit Limited.

The decrease in GWP was as a result of a loss portfolio reinsurance contract (LPT) undertaken with RiverStone Managing Agency Limited (for and on behalf of Lloyd's Syndicate 3500) by Brit Syndicate 2987 whom the Company has a significant quota share arrangement. The agreement was effective from 1 October 2021 and is for predominately legacy years of account written by Syndicate 2987. Under the agreement, Riverstone's Syndicate 3500 has indemnified Syndicate 2987 against potential adverse development in respect of net liabilities valued at approx. \$380.0m, thereby providing Syndicate 2987 with certainty on discontinued lines and reducing its exposure to US Casualty claims inflation. The above contract affected the inwards premium received by the Company by way of a Quota Share agreement with Syndicate 2987, seeing a circa \$71.0m reduction. Terms of the renewed Quota Share with Syndicate 2987 were unadjusted from 2020.

All business was written in Bermuda.

## A.7 Investment performance

The following table shows the fair market value of the Company's investment portfolio:

Investments (\$'m)	2021	2020
Equities	215.8	176.6
Debt securities	1,104.1	1,320.9
Mortgages and Loans	26.9	23.0
Specialised investment funds	253.3	171.4
<b>Total</b>	<b>1,600.2</b>	<b>1,691.9</b>

[Source: 2021 Annual Report and Financial Statements]

Invested assets at 31 December 2021 amounted to \$1,600.2m (2020: \$1,691.9m). The portfolio remains short duration and corporate bonds are predominantly investment grade, with a focus on defensive, non-cyclical names.



The following table shows the performance of those investments:

Investments (\$'m)	2021	2020
Equity securities	64.4	(15.1)
Debt securities	(2.4)	65.1
Mortgages and Loans	0.8	0.2
Specialised investment funds	51.1	(28.2)
Cash and cash equivalents	-	0.6
Derivatives	(8.1)	(5.0)
<b>Total return before expenses</b>	<b>105.8</b>	<b>17.6</b>
Investment management fees	(5.2)	(5.0)
<b>Total return net of fees</b>	<b>100.6</b>	<b>12.6</b>

[Source: 2021 Annual Report and Financial Statements]

Investment return, net of fees, during 2021 was a profit of \$100.6m (2020: profit of \$12.6m). This was driven by Equities, \$64.4m and Funds, \$51.1m, partially offset by losses on derivatives, \$8.1m, and Fixed Income Securities \$2.4m. Equity markets rallied over the year in response to additional stimulus measures and the vaccine rollout. Fixed Income was marginally negative as income was offset by capital losses. The US government bond yield curve rose by up to 90bps across the yield curve over the year.

## A.8 Material income and expenses during the reporting period

The Company's sources of income are premiums arising from the reinsurance of other Brit Group companies, third parties and investment income. The more significant expenses in 2021 were incurred claims, acquisition costs and operating expenses:

Expense (\$'m)	2021	2020
Incurred claims	147.4	289.4
Acquisition costs	12.0	15.8
Operating expenses	3.7	4.3
<b>Total</b>	<b>163.1</b>	<b>309.5</b>

[Source: 2021 Annual Report and Financial Statements]

Net claims incurred during 2021 amounted to \$147.4m (2020: \$289.4m). 2021 saw an elevated intensity of named US windstorms with the Company picking up significant losses from Hurricane Ida, coupled with losses from the Texas Winter Storms and the European Floods.

The financial impact of COVID-19 significantly reduced in 2021. As with 2020, COVID-19 predominantly impacted Contingency business (event cancellation) during 2021. Benefits arising from the effects of COVID-19 related restrictions, such as reduced volumes of commercial activity and suspension of court hearings, is reflected within the attritional claims ratio.

The Company's acquisition and operating expenses decreased by 21.4% to \$15.8m (2020: \$20.1m), predominantly reflecting a reduction in the commissions paid.

## **A.9 Other material information**

On 28 October 2021, AM Best affirmed the Financial Strength Rating of A (Excellent) and the Long-Term Issuer Credit Rating of "A" of Brit Re, with a 'stable' outlook. These ratings reflect Brit Re's balance sheet strength, which AM Best assessed as 'very strong'.

Effective 1 October, Syndicate 2987 completed a loss portfolio reinsurance contract with Riverstone Managing Agency Limited. The agreement is for predominately legacy years of account written by Syndicate 2987. Under the agreement, Riverstone's Syndicate 3500 has indemnified Syndicate 2987 against potential adverse development in respect of net liabilities for a premium of \$279.2m (Brit Re share \$64.0m), thereby providing Syndicate 2987 with certainty on discontinued lines and reducing its exposure to US Casualty claims inflation.

The Company, as part of Brit Limited, has an important role in fighting climate change, and firmly believes that insurance is a social good. In 2021 the Brit Group published its ESG strategy and has progressed its implementation.

## B. Governance Structure

### Introduction

The Company is committed to high standards of corporate governance and has established and maintained effective systems of governance which provide for sound and prudent management. There is a clear and well-defined organisational structure with clear, consistent and documented lines of responsibility. The Board and the Company's staff have the skills, knowledge and expertise to fulfil their allocated responsibilities. The Company's information systems produce sufficient, reliable, consistent, timely and relevant information on all business activities, commitments assumed and risk exposures. Appropriate risk management, regulatory compliance, internal audit and actuarial functions are established and maintained. The system of governance is therefore considered proportionate to the nature, scale and complexity of our business.

### B.1 Board and Senior Executive

#### i. Structure of the board and senior executive, the roles, responsibilities, and segregation of these responsibilities

The Board is responsible for the overall leadership of the Company and setting the Company's strategy, values and standards.

The Board has two committees, being the Audit Committee and the Risk Oversight Committee:

- The Audit Committee regularly reviews the Company's financial reports, financial reporting process, regulatory and compliance matters.
- The Risk Oversight Committee regularly reviews the effectiveness of the Company's risk management system.

In addition, there is a Management Committee which is responsible for the day-to-day management of the business including monitoring all outsource agreements.

The Board currently comprises of six directors: an independent non-executive chairman, two executive directors and two independent non-executive directors and a Brit Group non-executive director. Under the Board's terms of reference, the Board is required to meet at least four times a year.

The independent non-executive directors do not have any executive or other role or relationship with the Company or management that would affect their independence. They bring a wide range of experience and expertise both in the (re)insurance and financial services industries and are encouraged to challenge management.

The independent non-executive chairman is responsible for leadership of the Board, ensuring its effectiveness on all aspects of its role and setting its agenda. The chairman is responsible for setting the agenda for Board deliberations, with the help of the executive directors, to be primarily focused on strategy, performance, value creation and accountability, and ensuring that issues relevant to these areas are reserved for Board decision.

The Board is responsible for ensuring the maintenance of a sound system of internal control and risk management (including financial, operational, regulatory and compliance controls, and for reviewing the overall effectiveness of systems in place) and for the approval of any changes to the capital, corporate and/or management structure of the Company.

The Board periodically receives reports and recommendations from its committees.

There have been no material changes in the system of governance over the reporting period.

## Directors

Director	Position on the Board	
Mark Allan	Non-executive Director	Resigned 23 September 2021
Christopher Denton	Executive Director	
Karl Grieves	Executive Director	
John D. Nichols, Jr	Independent non-executive Director	
Graham Pewter	Independent non-executive Chairman	
Alan Waring	Independent non-executive Director	
Gavin Wilkinson	Non-executive director	Appointed 23 September 2021

## Senior officers

Name	Position
Karl Grieves	Finance & Operations Director and Principal Representative
Christopher Denton	Chief Underwriting Officer

## ii. Remuneration Policy and Practices

### Non-Executive Directors

Independent non-executive directors receive a fee in respect of their role. Fees are set at appropriate levels to reflect the individual responsibility and time commitment. Independent non-executive directors do not participate in either the Group's incentive arrangements or pension/early retirement schemes.

### Senior Executives

The Company has a total compensation philosophy, whereby salaries, bonuses and benefits are managed together in the context of employee and business performance taking into consideration the risks inherent in the activities performed by employees and with reference to external market compensation practices. This applies to all employees and executives consistently across Brit Limited. Levels of compensation are benchmarked against our key competitors.

In order to support the above strategy, the approach to remuneration is to provide overall pay packages that:

- Reward employees for delivering the Group's business plan and key strategic goals.
- Include incentive plans that reward superior performance in line with strategic ambitions and in a manner which is consistent with the Group's risk appetite.
- Recognise the strong link between variable compensation and performance at Group, business unit and individual levels.
- Appropriately reflect the risk appetite incorporated into the business strategy, as well as taking into account the Group's regulatory and compliance obligations.
- Align employees' interests with the interests of shareholders and other external stakeholders.

The remuneration policy is reviewed annually and a key feature is that remuneration should not adversely impact the Group's ability to maintain an adequate capital base proportionate to the results. Remuneration arrangements do not encourage risk-taking in excess of the risk management strategy.

Individuals do not take part in discussions regarding their own remuneration.

Where appropriate, separate role-specific bonus arrangements may be implemented. For more significant bonuses, the Company may require an element of the bonus to be deferred.

### **iii. Pension or early retirement schemes**

For each employee, the Company contributes to a company or personal plan or pays an equivalent cash allowance to the individual.

### **iv. Transactions with shareholders, the Board and persons who exercise a significant influence**

#### **Other members of the Group**

The Company has written various reinsurance agreements with Brit Syndicates Limited and Brit UW Limited. See section A.6.

The Company paid \$2.1m to other members of the Group in respect of outsourcing agreements for the provision of services to the Company in 2021 (2020: \$2.9m).

#### **Fairfax Financial Holdings Limited (Fairfax)**

Hamblin Watsa Investment Counsel Limited (HWIC), a subsidiary of Fairfax, is an investment manager to the Company. The Company incurred and paid investment management fees to HWIC of \$4.4m in 2021 (2020: \$4.2m).

## **B.2 Fit and proper requirements**

The Company is committed to ensuring that persons appointed to the Board and senior management roles are fit and proper to hold office. Our directors and senior managers must meet the following criteria to be deemed fit and proper:

- Possess appropriate skills, experience, educational and/or professional qualifications and reputation.
- Display a high degree of competency and professionalism in current and previous roles.
- Demonstrate at all times good integrity, honesty, diligence, solvency, judgement and sound ethical character and must not have been reprimanded, disqualified or removed by a professional or regulatory body in relation to questions of honesty, integrity or business conduct.
- Understand and reinforce a strict regulatory compliance, risk awareness and governance environment.
- Have not been involved in the management of a company that has failed as a result of deficiencies in the management of that company.
- Have not been the subject of civil or criminal proceedings in relation to the management of a company.
- Have not been the subject of a serious criminal conviction.



- Have no conflict of interest in performing their duties; or if the person has a conflict of interest, it would be prudent to conclude that the conflict will not create a material risk that the person will fail to properly perform the duties of the position.
- Compliance with individual conduct rules as described by the United Kingdom's Financial Conduct Authority and Prudential Regulation Authority, which includes being open and co-operative with regulators.
- Individuals must conduct business prudently and in compliance with the relevant legislation, international sanctions and the relevant Bermuda Monetary Authority Insurance Codes of Conduct.

Fitness and propriety are assessed for any prospective directors joining the Board.

The ongoing assurance of fitness and propriety of the Company's executives is re-assessed annually or more frequently should the Company become aware of any issue which may adversely impact upon the fit and proper assessment of those concerned. A register of all persons falling within the fit and proper regime is maintained by the Regulatory Compliance function of the Group.

### Professional qualifications, skills and expertise of the board and senior executives



**Graham Pewter** has served as Chairman since November 2018 and as a director since May 2018. Graham served as President and Chief Executive Officer of Catlin Insurance Company Ltd in Bermuda from 2003 until his retirement in 2015. Prior to Catlin, Graham was President and Chief Executive Officer at Commercial Risk Partners Limited, a subsidiary of SCOR Group.

Graham previously held executive positions with LCF Rothschild Insurance Services and Cologne Reinsurance Company (Bermuda) Limited. Graham is currently a director of Sussex Capital Management Limited. In 2014, he was awarded the Queen's Certificate and Badge of Honour for service to Bermuda.



**Chris Denton** is the Chief Underwriting Officer of Brit Re. Chris joined Brit in 2008 as the Group's Reinsurance and Investment Actuary. Chris subsequently established and led the Investment Risk team, before moving onto managing the Group's investment portfolio. In 2016, he became the Head of Financial Strategy with responsibility for capital management, ALM, investments and development of the finance operating model. A year later, he led the launch of

Sussex Capital, Brit's ILS fund management platform. Chris is the Managing Director of Sussex Capital. Prior to joining Brit, Chris consulted on a range of business lines and actuarial disciplines at Guy Carpenter, RSA and JLT.

Chris is a Fellow of the Institute of Actuaries, holds the Certificate in Quantitative Finance and has an MA (Hons) degree in Mathematics from the University of Cambridge.



**Karl Grieves** serves as Finance and Operations Director of the Company. Prior to joining the Group in 2013, Karl was Managing Director of Flagstone Syndicate Management Limited (a Lloyd's managing agency) and Group Deputy Chief Operating Officer of Flagstone Re. Previous roles include Finance Director at Aon Insurance Managers in the Isle of Man. Karl is also a director of Sussex Capital Management Limited.

Karl is a Fellow of the Institute of Chartered Accountants in England and Wales, qualifying with KPMG London. He holds a BA (Hons) Economics degree from the University of Leeds and an MSc in Business Administration from the University of Bath.



**John D. Nichols, Jr (Jay)** served as the CEO of the reinsurance operations of Axis Capital Ltd. from April 2012 until April 2017. John also was instrumental in creating a team to launch Harrington Reinsurance Ltd., a joint venture of Blackstone and Axis Capital Ltd. John served on the Board of Harrington until his retirement from Axis. John is the former President of RenaissanceRe Ventures Ltd., where he and his team were responsible for business development and management of RenaissanceRe's Joint Ventures and Venture Capital businesses. In his role at RenaissanceRe, John was responsible for the formation of DaVinci Reinsurance and Top Layer Reinsurance, as well as several sidecars and other ventures. Prior to joining RenaissanceRe in 1995, John held various positions at Hartford Steam Boiler, Monarch Capital and the accounting firm of Matson, Driscoll and D'Amico. John served as a director of the Protective Insurance Corporation from May 2017 to June 2021 and as interim CEO from October 2018 until May 2019.

John serves on the Board of Enhance Re, a joint venture of Enstar and Allianz. John is an investor in and Board Member of Chelsea Avondale, a holding company that owns Max Insurance, a Canadian property insurance company as well as Skynet Analytics, which produces sophisticated pricing models for insurance companies. John serves as a Senior Advisor to Two Sigma Insurance Quantified, as an advisor to State Farm Mutual Insurance Company's venture capital operation, and as a Senior Advisor to REIN, an insurance platform company. John is on the Board and is Chairman of the Governance and Audit Committees of Delaware North Companies, a global leader in hospitality management and food service management. From May 2017 John has served on the advisory Board for Parsons School of Design.



**Alan Waring** has served as a director since March 2019. Alan has over forty years' experience in the insurance industry. Alan was the founder and owner of International Specialty Brokers Ltd (ISBL), which became Amwins Bermuda effective 1 December 2020. As well as ISBL, Alan has spent time working in various executive roles at Royal Sun Alliance, Arthur J Gallagher and Crump (now CRC). During that time, he has specialised in risk management programme design and administration, including the design and implementation of individual entity insurance and reinsurance placements, single and multiline programmes, captives and rent-a-captives, for public sector and commercial clients. Alan has operated and placed business within the London, US and Bermuda markets, both Insurance and Reinsurance.



**Gavin Wilkinson** was appointed on 23rd September 2021. He is the Brit Group Chief Financial Officer. Gavin has worked in the insurance industry for 17 years and began his career at Deloitte working across both Audit and Corporate Finance, primarily for multinational clients. Gavin is also a member of the Lloyd's Market Association Finance Committee. Prior to joining Brit in May 2021, Gavin spent over 10 years at RSA in a number of Group leadership positions, including director roles across Strategy, Performance, Capital, Corporate Finance, and the Office of the CEO followed by country and regional CFO roles in Ireland, UK and International, and Scandinavia.

Gavin is an ICAEW Chartered Accountant and holds a Master's degree in Chemistry from the University of Oxford.

## B.3 Risk management and solvency assessment

### i. Risk Management Framework

Risk management within the Company is a continuous process that links directly to the Company's business and risk management strategies and the associated Board risk appetites. The Company's RMF sets out how risks are identified, measured, managed and monitored. It also serves as one of the foundations for the Commercial Insurer Solvency Self-Assessment (CISSA). The Risk Oversight Committee is the owner responsible for the design, production and implementation of the RMF, as well as monitoring and maintaining its content in line with Brit Re's objectives and market conditions. The Group's Chief Risk Officer (CRO) ensures ongoing compliance with the framework and its processes supported by management information. The framework is reviewed by the CRO at least annually, or as soon as possible following any material change in the Company's risk profile.

The RMF process has been in place for a number of years with no material changes made.

The key elements of the RMF are:

- **Identification:** Risk events, risks and relevant controls are identified, classified and recorded in the Company's risk register. This is a continuous process which considers any emerging and existing risks.
- **Measurement:** Risks are assessed and quantified and controls are evaluated. This is done through a combination of stochastic modelling techniques, stress and scenario analysis, and reverse stress testing and qualitative assessment using relevant internal and external data.
- **Management:** The information resulting from risk identification and measurement is used to improve how the business is managed. Key risk management techniques include implementing controls to mitigate risks and transferring or avoiding risks outside of the Company's risk tolerances.

These elements of the framework are supported by appropriate governance, reporting management information, policies, culture, and systems. In particular, the RMF applies to all employees in the Group, who are expected to operate within its guidelines at all times.

In line with the RMF, the Board sets risk tolerances at an overall level and each of the key categories of risk. The risk tolerances are reviewed on an annual basis to ensure that they continue to appropriately capture the risks faced by the Company, and that they align to the Company's business and strategic objectives. Throughout 2021, the Company remained within all risk tolerances approved by the Board.

Ownership of many of the day-to-day activities is outsourced to the Group's risk management function. The key categories of risk include insurance, market, credit, liquidity and operational risks. The risk management function includes experienced risk specialists within each of the key categories of risk.

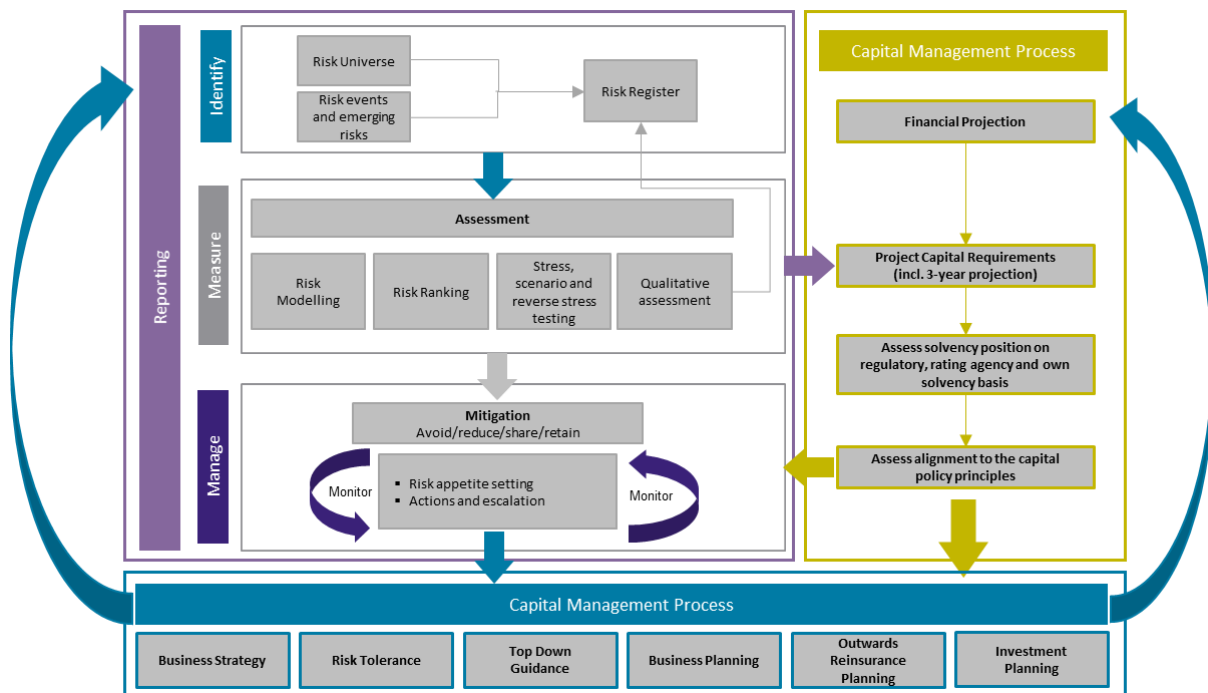
The key governance bodies in the risk management process specific to the Company are set out below:

- **The Board:** responsible for setting business and risk strategy and ensuring the principal risks and uncertainties facing the Company are managed;
- **Risk Oversight Committee:** responsible for the oversight of the Company's RMF and ensuring the Company is operating within the Board's approved risk appetite; and
- **Management Committee:** responsible for the oversight and review of key deliverables and updates from the Group's risk management function.

Section C of this document discusses the risk profiles and any significant risks the Company is exposed to by any individual risk category in further detail.

**ii. Description of how the risk management and solvency self-assessment systems are implemented**

The diagram below sets out the three processes which make up the overall CISSA process and how the solvency assessment is performed and the capital management and risk management processes interact:



The CISSA process operates continuously, with CISSA outcomes presented to the Risk Oversight Committee and Board. The CISSA outcomes are used to facilitate strategic decision making. The capital management process is a key part of the overall CISSA process as capital considerations are critical in making key strategic decisions. The results of the capital management process are also used as the basis for some of the risk metrics which are regularly monitored as part of the risk management process to ensure adherence to the Board approved risk appetite limits.

**iii. Relationship between the solvency self-assessment, solvency needs, and capital and risk management systems**

See section ii above.

**iv. Description of the solvency self-assessment approval process**

An annual CISSA report is produced which summarises the outcomes of the above process, both for the preceding year and over a forward-looking planning-horizon. This report is reviewed and approved by the Board, who have ultimate responsibility for the CISSA process.

## **B.4 Internal control system**

### **i. Overview**

The Company's internal controls framework is made up of:

- the control environment - the culture and organisational structures that support sound internal control;
- control governance activity - the roles and responsibilities that provide oversight of internal control;
- control assessment, monitoring and reporting activities - supporting the oversight and governance of internal control; and
- control design and operation - outlining the elements of effective control design and operation.

In order to ensure the ongoing effectiveness and efficiency of the control framework, the Company operates a "three lines of defence model".

Controls are first and foremost the responsibility of the business and relevant line management, i.e. the 'first line of defence'. As the first line of defence, line management is responsible for monitoring day to day adherence to this framework within its area of jurisdiction.

Assurance functions including Risk Management, Compliance and Internal Control, provide a 'second line of defence'. These functions provide additional assessments, challenge and advice to ensure risks are managed appropriately. The functions report to the Board and the Risk Oversight and/or Audit Committee as appropriate.

The third line of defence is provided by the Group's Internal Audit function. The Internal Audit department provides an independent, objective assurance designed to add value and improve operations. It helps accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

Ultimate responsibility for implementing and monitoring the Internal Control Framework resides with the Board.

### **ii. Regulatory Compliance**

The Regulatory Compliance function is responsible for:

- Identifying, documenting and assessing the regulatory risks of the business and identifying processes and controls to be implemented to mitigate these risks;
- Ensuring adherence with policies and procedures and with the highest ethical standards in all business activities;
- Understanding and advocating rules, regulations and laws and the effective management of regulatory risk; and
- Proactively working with and advising the business to manage regulatory risk.

The Brit Re Regulatory Compliance Officer submits a report to the meetings of the Board and the Audit and Management Committees on regulatory compliance matters including applicable laws, regulations and related internal policies and procedures. If any regulatory compliance breaches or deficiencies were to be identified, the Brit Re Regulatory Compliance Officer would report on the corrective measures recommended to address them, and on corrective measures already taken.

### **iii. Regulatory Compliance Policy**

The Company's policy is reviewed on an annual basis and, subject to Board approval, will be amended (as appropriate) to reflect current best practice in corporate governance and the duties and responsibilities of the regulatory compliance role. Review is undertaken by the Brit Re Regulatory



Compliance Officer and by the Group Director of Legal and Compliance and any recommended changes reviewed by the Risk Oversight Committee, and apart from minor changes, recommended to the Board for approval.

## **B.5 Internal Audit function**

The primary role of the Group's Internal Audit function is to provide independent assurance that Brit Re's risk management, governance and internal controls are operating effectively and therefore help the Board and Executive Management to protect the assets, reputation and sustainability of the Group.

Internal Audit operates a three-year planning cycle aimed at providing coverage across all key areas of the Group. The three-year internal audit plan is produced specifically for the Brit Group (including Brit Re). On an annual basis, the three-year internal audit plan is formally updated with a specific focus on the following audit year and is approved annually by the respective audit committees. The internal audit plan, formulated on a risk-based approach, ensures that business activities are adequately covered, with a particular focus on the higher risk areas of the business.

Internal Audit identifies key risks associated with the area subject to audit and tests the adequacy and effectiveness of the controls that mitigate those risks. On completion of the audit, an Internal Audit report is provided to the Management Committee and the audit committee. The report includes a description of findings (if any) and documented time bound management actions to address them.

The Internal Audit team monitors the progress and completion of all management actions.

It is the responsibility of the relevant Audit Committee and the Group Head of Internal Audit to ensure that the Internal Audit function has the necessary resource, skills and expertise to perform its duties effectively. The function is resourced in proportion to the scale and complexity of the business and its risks. At least annually, the Group Head of Internal Audit will confirm to the Audit Committee, that the Internal Audit function has adequate resources to complete the approved internal audit plan.

### **Independence and Objectivity**

The Internal Audit function derives its ultimate authority from the various Boards within the Group via delegation to the respective Audit Committees. To maintain independence, the Group Head of Internal Audit reports functionally to the Chair of each Audit Committee, and administratively (and for executive communication purpose) to the Group Chief Executive Officer. The Group Head of Internal Audit has direct access to the Chair of the Audit Committee at all times should such communication be required by either party.

To ensure independence, the Group's Internal Audit Policy sets clear expectations for Internal Audit to:

- Remain free from interference or influence in the selection of audit, scope, procedures, frequency, timing, or report content.
- Have no direct operational responsibility or authority for the activities subject to audit.
- Exhibit professional objectivity in gathering, evaluating, and communicating information.
- Rotate audit staff as necessary, to preserve independence in the audit of business areas and / or processes.
- Confirm the independence of Internal Audit to the respective audit committee, at least annually.
- Hold regular sessions with the audit committee where executive management is not present.

## B.6 Actuarial function

Brit Group Services Limited provides actuarial services to the Company. The Actuarial Function is led by the Deputy Chief Actuary, who performs the roles of Signing Actuary and Loss Reserving Specialist and is responsible for all activities of the Actuarial function. The Actuarial Function is a component of the overall Actuarial team. The work conducted and opinions expressed by the Actuarial Function are wholly independent from other business functions.

The principal activities carried out by the Actuarial Function are:

- **Technical Provisions** – the Actuarial Function is responsible for coordinating and overseeing the reserving process (for calculating ultimate premiums and claims) and overseeing the calculation of technical provisions on an economic balance sheet basis; ensuring appropriateness of methodologies, models and assumptions used.
- **Business Planning** - The role of the Actuarial Function in the annual business planning process is one of independent review and challenge of the underwriters' business plans and planning assumptions. The review focuses on, but is not limited to, the key assumptions within the business plan for each class of business.
- **Reinsurance Strategy** - The role of the Actuarial Function in the Company's outwards reinsurance strategy is one of independent review and challenge of the proposed reinsurance programmes for the following year (based on the work conducted as part of the annual business planning process) in conjunction with the Risk Management Function.

More broadly the Actuarial team is led by Brit Group's Chief Actuary and in addition to the Actuarial Function consists of the underwriter facing Subject Matter Expert team, and the Actuarial Analytics team.

The principal activities carried out by the Actuarial team in addition to those of the Actuarial Function are:

- **Technical Pricing Basis** – annual review of the Company's technical pricing.
- **Pricing Models** - working with the Company's underwriting team, the Actuarial team develop and refine the suite of rating models in place in the Company and ensure the models adhere to the Group's pricing standards.
- **Underwriter support** – including the review of individual policies; portfolio profitability and other actuarial work to support underwriting at Brit

Please note that in the above activities, the Actuarial function interacts with other business functions across the Group; namely Underwriting, Finance, Risk Management, Claims and Operations (which includes the Outwards Reinsurance Processing, IT and Data and Analytics teams).

## B.7 Outsourcing

The Company only approves proposals to outsource where the proposal is supported by a clear and achievable business case, and the due diligence requirements set out in the Group's Global Procurement and Material Outsourcing Policy have been met. For material outsourcing, ongoing due diligence is carried out on an annual basis and all results assessed in full.

Any proposals to outsource must include:

- a legally binding agreement which sets out terms and conditions relating to compliance, confidentiality, and disclosure of circumstances likely to prejudice delivery, information sharing, access and suitable cancellation rights. A detailed list of required contract provisions is set out in the Group's Procurement and Material Outsourcing Policy.
- adequate risk mitigation practices in place for the effective oversight and management of outsourcing arrangements and to identify potential problems at an early stage.

Management of the outsource provider includes the definition and subsequent regular monitoring of a suitable range of service level agreements during the monthly Management Committee meetings. These cover the key contractual commitments and specify minimum levels of performance and, where appropriate, penalties. Any issues are escalated to the Board.

Outsourcing agreements are subject to the same level of diligence and monitoring as third-party service providers. The terms are negotiated and agreed on an arm's length basis.

One of the key due diligence requirements is to assess the information security controls of any outsource arrangement. This is necessary to assess the risk of sharing our information and that of our cedants with a third-party organisation. The information security control assessment is completed in two stages:

The first stage requires the third party to complete a pre-assessment form, which enables the Group to determine the risk level and criticality of the engagement.

The second stage uses the results of the pre-assessment to determine if it is necessary for the Group's IT Security team to perform an enhanced assessment.

An enhanced assessment makes use of an external platform and requires the third-party to complete a more in-depth security questionnaire.

A Group company, Brit Group Services Limited, located in the UK, provides critical services to the Company including risk management, internal control, actuarial, claims handling and internal audit.

## **B.8 Other information**

All relevant information regarding the Company's system of governance is considered to be included in sections B.1- B.7 above.

## C. Risk profile

The Company's activities expose it to a number of risks which have the potential to affect its ability to achieve its business objectives. This section provides information regarding our risk management approach for each of the principal risks faced by the Company.

As described in section B.3, the risks arising from any of the business activities are managed in line with the RMF in order to protect policyholders and maximise shareholder value. This established framework addresses all the risks surrounding the Company's past, present and, in particular, future activities.

The risks that the Company is exposed to have remained materially consistent year-on-year with no significant changes made to the overall risk profile and business written.

### C.1 Material risks the Company is exposed to

#### i. Insurance Risk

Insurance risk arises from the possibility of an adverse financial result due to actual experience being different from that expected when an insurance product was designed and priced. The actual performance of insurance contracts is subject to the inherent uncertainty in the occurrence, timing and amount of the final insurance liabilities. Insurance risk is the principal risk to which the Company is exposed as its primary function is to underwrite reinsurance contracts.

This risk is further broken down into the following risks:

##### Underwriting Risk

This is the risk that the insurance premiums will not be sufficient to cover the future losses and associated expenses. It arises from the fluctuations in the frequency and severity of financial losses incurred through the underwriting process by the Company as a result of unpredictable events.

The Company is exposed to natural catastrophe losses. Losses arising from natural catastrophes are one of the most material risks to which the Company is exposed.

##### Reserving Risk

This is the risk that the actual cost of losses for obligations incurred before the valuation date will differ from expectations or assumptions set as part of the reserving process. This is a key risk for the Company as the reserves for unpaid losses represent the largest component of the Company's liabilities and are inherently uncertain.

#### ii. Market Risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises three types of risk: interest rate risk, currency risk and other price risk. Credit risk on financial investments and cash is covered in the credit risk section.

##### Interest Rate Risk

Interest rate risk is the risk that the fair value and/or future cash flows of a financial instrument will fluctuate because of changes in interest rates. Changes in interest rates are a key risk to the Company given the current portfolio composition. The Company is exposed to interest rate risk through its

investment portfolio and cash and cash equivalents. The sensitivity of the price of these financial exposures is indicated by their respective durations. Therefore, the greater the duration of a security, the greater the possible price volatility.

### Currency Risk

Currency risk is the risk that movements in exchange rates impact the financial performance or solvency position of the Company. Fluctuations in exchange rates against the US dollar may lead to profit or losses depending on the relative mix of non-US dollar denominated net assets and liabilities of the Company.

### Other Price Risk

This is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk), whether those changes are caused by factors specific to the individual financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market.

Financial assets and derivatives that are recognised at their fair value are susceptible to losses due to adverse changes in their prices. This is known as price risk.

Listed investments are recognised in the financial statements at quoted bid price. If the market for the investment is not considered to be active, then the Company establishes fair valuation techniques. This includes using recent arm's length transactions, reference to current fair value of other similar investments, discounted cash flow models and other valuation techniques that are commonly used by market participants. Adverse fluctuations in equity values is the Company's key investment risk given the current composition of its asset portfolio.

The prices of fixed and floating rate income securities are predominantly impacted by currency, interest rate and credit risks.

### iii. Credit Risk

This is the risk that one party to a financial arrangement will fail to discharge an obligation and cause the other party to incur a financial loss. The main sources of credit risk relate to:

- **Reinsurers:** through the failure to pay valid claims against a reinsurance contract held by the Company.
- **Premium debtors:** where the Group or third party cedant fails to pass on premiums or claims collected or paid on behalf of the Company.
- **Investments:** through the issuer default of all or part of the value of a financial instrument or the market value of that instrument.

## C.2 Insurance Credit Risk (reinsurers and premium debtors)

### Reinsurance credit risk

The Company is exposed to reinsurer credit risk through the various retrocession covers purchased. This risk is considered to be marginal because the reinsurers participating in the aggregate retrocession covers are highly rated by AM Best or provide fully collateralised reinsurance cover and therefore the probability of becoming financially impaired over a one-year time horizon is negligible.



### **Premium debtor credit risk**

The Company's most material premium debtors are Brit Syndicate 2987 and Brit UW Limited. As both policyholders are part of the Group, the premium debtor credit risk associated with these transactions is considered negligible. Additionally, Brit Re has the right to offset premium debt against claim amounts owed to S2987.

### **iv. Liquidity Risk**

This is the risk the Company may encounter difficulty in meeting obligations associated with financial liabilities that are settled by delivering cash or another financial asset. The predominant liquidity risk the Company faces is the calls on its available cash resources in respect of claims arising from insurance contracts.

### **v. Operational Risk**

Operational risk is the potential for loss arising from the failure of people, process or technology or the impact of external events. The nature of operational risk means that it is dispersed across all functional areas of the Company.

Group risk is considered part of operational risk. The Company is dependent upon a number of functions provided by the Group through outsourcing agreements to support its operation. It is noted that other than the risks relating to the outsourcing arrangements, the Company and Group's interests are aligned and therefore the amount of residual Group risk is considered to be small.

Cyber security risk is also considered part of operational risk. Cyber security breaches, could, if they occurred, cause significant financial losses and/or damage to the reputation of the Company.

### **vi. Commercial and Strategic risk**

There is a risk that the Company's strategy is not appropriate or is not implemented effectively which could result in material losses.

The Company is currently rated 'A' by AM Best. Any future downgrade to the Company's credit rating would adversely affect the Company's standing in the market.

### **vii. Other material risks**

#### **Covid-19**

COVID-19 continues to have a significant impact on the insurance industry. During 2021, Brit Re's priorities have remained the safety of its employees and continuity of service to clients and brokers. Brit Re have maintained a high level of service to clients and Brit Re's collaborative culture has shown itself at its best.

While 2021 has seen the relaxation of some of the measures governments implemented to try to contain the pandemic, there continues to be uncertainty and challenges. Pandemic exclusions offer some protection against new insurance claims. However, there remains uncertainty around losses from COVID-19. Syndicate 2987 would expect the level of uncertainty to reduce over time, however, within areas of the account such as Casualty Treaty, Property Treaty and Open Market Property the ultimate loss outcome is still to emerge and will be influenced by factors such as coverage issues and the interpretation of contract wording. COVID-19 has also caused significant volatility in the financial markets. Interest rates, while rising remain at depressed levels and inflation continues to increase.

## Climate Change

Climate change is a key example of a developing risk identified as part of the Company's emerging risk review, and the potential impact on the insurance industry is an area of focus for the market and regulators. The financial risks to insurers include the potential for:

- Increases in the frequency and severity of weather-related natural catastrophes, for example, hurricanes and wildfires.
- Liability claims against insureds.
- Impacts on insurers' investments, due to changes in government policy or the impact of climate change itself.

The Company is managing the risks associated with climate change in line with the RMF and regulatory requirements are monitored through the committees.

## C.3 How Risks are mitigated

### i. Insurance risk

#### Underwriting Risk

The Company has developed underwriting guidelines, limits of authority and business plans which are binding upon all staff authorised to underwrite. In addition, an independent pricing assessment is carried out by an external third party to assess pricing adequacy.

In order to limit risk, the number of reinstatements per policy is limited, deductibles are imposed, policy exclusions are applied and whenever allowed by statute, maximum indemnity limits are put in place per insured event.

The Company may also purchase retrocession covers as deemed relevant to control its overall exposure.

#### Reserving Risk

The Management Committee chaired by the Finance and Operations Director is responsible for the management of the reserving risk for the Company.

The Company has a rigorous process for establishing reserves for insurance claim liabilities and a number of controls are used to mitigate reserving risk. The Claims Policy sets out the approach to management of claims risk. In particular, this deals with notification, validation of policy terms and conditions, investigations and use of adjusters, assessors and other experts, setting of provisions for case estimates, negotiation and settlement of claims, claim authorities, the peer review process, file management, review and external audits, suspicious and disputed claims and ex-gratia payments.

The Group has an experienced team of actuaries who perform the quarterly reserving analysis using a wide range of actuarial techniques to estimate the claims liabilities in line with the Reserving Policy. They work closely together with other business functions such as underwriting, claims management and exposure management to ensure that they have a full understanding of emerging claims experience.

The Reserving Policy sets out the approach to estimating claims provisions and is designed to produce accurate and reliable estimates that are consistent over time and across classes of business. The actuarial best estimate set out in the policy is subject to sign-off by the Management Committee as part of the formal governance arrangements for the Company. The estimate agreed by the Management Committee is used as a basis for the Company's financial statements. The reserves in the financial

statements are presented to the Audit Committee who recommend the reserves to the Board for ultimate sign off.

## **ii. Market Risk**

### **Introduction**

The Company's market risk is managed by specific risk appetite thresholds in reference to asset allocation and liquidity and is monitored with regards to earnings and solvency. The asset liability management position is monitored with regards to interest rates and foreign exchange on both an earnings and a solvency basis.

The majority of the portfolio is held in cash, government bonds and investment grade corporate bonds. The portfolio is actively managed and changes to the global macroeconomic environment may trigger a review or changes to the investment positioning. Any investment must comply with Board approved tolerances for asset allocation, duration and foreign exchange matching.

### **Interest Rate Risk**

The Company takes into account the duration of its required capital, targeting a range for the investment portfolio duration that, under a variation in interest rates, limits the change in the solvency position of the Company. The duration of the investment portfolio is then set within an allowable range relative to target duration.

### **Currency Risk**

The Company matches its currency position so holds net assets across a number of currencies. The Company takes into consideration the underlying currency of its liabilities and invests its assets proportionately across these currencies so as to protect the solvency of the Company, and hence capital available for distribution to the shareholder, against variation in foreign exchange rates. As a result, the Company holds a significant proportion of its assets in foreign currency investments.

Foreign currency forward contracts are used to achieve the desired exposure to each currency. From time to time the Company may also choose to utilise options on foreign currency derivatives to mitigate the risk of reported losses due to changes in foreign exchange rates. The degree to which options are used is dependent on the prevailing cost versus the perceived benefit to shareholder value from reducing the chance of a reported loss due to changes in foreign currency exchange rates.

### **Concentration Risk**

The Board risk tolerance sets limits on concentration of assets. The metrics are monitored by the Risk Oversight Committee and Board at least quarterly.

### **Other Price Risk**

The Company invests in accordance with the "prudent person principle" (See section C.4) within the Investment guidelines which also establish maximum allocations to different asset classes.

## **iii. Credit Risk**

### **Insurance Credit Risk (reinsurers and premium debtors)**

#### **Reinsurance Credit Risk**

Credit risk from reinsurers is controlled through only transacting with reinsurers that meet certain minimum requirements and that have been approved by the Management Committee. The Group's Finance function reviews the list of approved reinsurers and their maximum exposure limits at least annually and following any significant changes in a reinsurer's position, including changes in credit

rating. The Finance function also monitors exposure against the assigned reinsurer limits and may request collateral where any limits are breached.

Any reinsurance aged debts are monitored by the Management Committee. Any material aged debts are reported to the Risk Oversight Committee and the Board at least quarterly. At present there is no reinsurance aged debt.

### **Concentration Risk**

Reinsurance cover, if required, is placed with fully collateralised providers or multiple markets to diversify exposure and limit concentrations of credit risk – the Group has exposure appetite limits to each of its approved counterparties.

#### **iv. Investment credit risk**

##### **Investment Credit Risk Management Process**

Credit risk relating to financial investments and cash and cash equivalents is monitored by the Management Committee, chaired by the Finance and Operations Director, which is responsible for the management of investment credit risk. The Investment Risk Framework and Investment Policy set out clear limits and controls around the level of investment credit risk. The Company has established concentration guidelines that restrict the exposure to any individual counterparty. The investment guidelines further limit the type, credit quality and maturity profile of both the Company's cash and investments. In addition, the investment risk framework further limits potential exposure to credit risk through the monitoring of the aggregate investment risk limits.

##### **Risk Mitigation**

The Company uses derivatives from time to time. The four main derivative classes are credit derivatives, foreign exchange forwards and options, interest rate derivatives and equity index options. Derivatives are only used for the purposes of efficient portfolio management and reduction in investment risk. Credit risk with respect to derivatives, where deemed necessary, is controlled with the implementation of collateral agreements with derivative counterparties that put a finite limit on the credit risk of each transaction.

#### **v. Liquidity risk**

The Company monitors the levels of cash and cash equivalents on a daily basis, ensuring adequate liquidity to meet the expected cash flow requirements due over the short term.

The Company also limits the amount of investment in illiquid securities in line with the liquidity policy set by the Board. This involves ensuring sufficient liquidity to withstand claim scenarios at the extreme end of business plan projections by reference to an internally developed and modelled realistic disaster scenarios (RDS). Contingent liquidity also exists in the form of a Group revolving credit facility.

#### **vi. Operational risk**

Operational risk exposures are managed through a consistent set of management processes that drive risk identification, assessment, control and monitoring.

An operational risk management framework is in place to ensure an appropriate standard approach is taken to managing operational risk across the Group, including the Company. The key elements of this framework are:

- Allocation of responsibility for the identification and assessment of operational risk. Standard tools are used to facilitate these assessments.

- Definition of standard elements of sound operating controls that are expected to be in place to address all identified operational risks.
- A process that integrates with the Company's internal model to support the setting and monitoring of operational risk appetite and tolerances.
- Governance, reporting and escalation for operational risk.
- Infrastructure supporting the operational risk management framework; and
- Operational risk management training and awareness.

The Company has a number of controls in place that mitigate the operational risk from cyber security risk and outsourcing functions to the Group. One of these controls is performance monitoring against contractual service level agreements (SLAs), which involves agreement with the Group at the start of the outsourcing contract. The SLAs are monitored to ensure the delivery of expected business benefits and identify and address issues of underperformance. See section B.7 for further details of the Company's outsourcing arrangements with the Group.

#### **vii. Commercial and Strategic risk**

The Company actively manages its commercial and strategic risk. Strategic decisions are subject to Management Committee, Risk Oversight Committee and Board review prior to implementation.

#### **viii. Other material risks**

The Company is managing the risks associated with climate change and pandemics in line with the RMF. This will continue to be an area of management and risk committee focus.

### **C.4 Material risk concentrations**

The Company is exposed to the potential of large claims from natural catastrophe events. The Company's catastrophe risk appetite is set by the Board who may adjust limits to reflect market conditions. Overall, the Company sets its catastrophe risk tolerances on an aggregate basis varying for different scales of event.

The Company closely monitors aggregation of exposure to natural catastrophe events against agreed risk appetites using stochastic catastrophe modelling tools, along with knowledge of the business, historical loss information, and geographical accumulations. Stress and scenario tests are also run, such as Lloyd's and internally developed RDS's.

The Company also limits concentrations in investments to avoid market concentration risks (see section C.2.iii).

### **C.5 Investments in accordance with the prudent person principle**

Under the Company's Investment Policy, the Company may only invest in those assets in accordance with the "prudent person principle" requirements. The Company only invests in assets and instruments, the risks of which it can properly identify, measure, monitor, manage, control and report, taking into account the Company's capital and solvency needs.



## **C.6 Stress and scenario testing**

Stress and scenario testing is an important risk management tool to increase the Company's understanding of its risk profile and its ability to withstand severe events. The stress and scenario testing is performed as part of the Company's overall CISSA processes (see section B.3), and considers events considerably more severe than the Company's historical experience. The results of the testing are summarised in the annual CISSA report reviewed by the Board.

The latest exercise confirms that the Company has sufficient capital and liquidity to absorb the losses under each scenario considered and continue to remain viable.

## **C.7 Other information**

All relevant information regarding the Company's risk profile is considered to be included in sections C.1 to C.5 above.

## D. Valuation for solvency purposes

This section provides information on the valuation bases, methods and assumptions on the inputs used to determine solvency.

The Company prepares its financial statements in accordance with Financial Reporting Standards (FRS) 102 and FRS103, being the applicable accounting principles generally accepted in the UK relating to (re)insurance companies (UK GAAP). The Company has used the valuation principles outlined by the BMA "Guidance Note for Statutory Reporting Regime". There are no material differences between the shareholder's equity as stated in the financial statements versus the available statutory capital and surplus.

The BMA regulatory regime requires the compilation of an economic balance sheet (EBS) in order to determine the solvency position of an entity. The key principles the Company has employed to produce the EBS are:

- I. Assets should be valued at the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction;
- II. Liabilities should be valued at the amount for which they could be transferred, or settled, between knowledgeable willing parties in an arm's length transaction; and
- III. There have been no changes in valuation techniques during 2021.

### D.1 Valuation bases, assumptions and methods used to derive the value of assets under the EBS framework

The BMA's guidance and key principles outlined above are used to derive the value of assets for the Company's EBS. The key differences in the Company's asset values between the Company's financial statements relates to the following:

- Non-overdue reinsurance receivables are not classified as assets separately under the EBS, as they are included in the technical provisions; and
- Deferred acquisition costs in the GAAP balance sheet are removed from the EBS as they do not meet the asset valuation requirements under the EBS framework.

Reinsurance recoveries are detailed within section D.3.

### D.2 Valuation bases, assumptions and methods used to derive the value of Net Technical Provisions under the EBS framework

The following table summarises the Company's net technical provisions under UK GAAP and EBS bases:

Balance sheet as at 31 December 2021 (\$'m)	GAAP	EBS	Difference
<b>Net Technical Provisions</b>			
Best estimate	668.8	584.2	(175.5)
Risk margin	-	42.6	42.6
<b>Total Net Technical Provisions</b>	<b>668.8</b>	<b>626.8</b>	<b>(132.9)</b>

Balance sheet as at 31 December 2020 (\$'m)	GAAP	EBS	Difference
<b>Net Technical Provisions</b>			
Best estimate	838.8	652.5	(186.3)
Risk margin	-	44.4	44.4
<b>Total Net Technical Provisions</b>	<b>838.8</b>	<b>696.9</b>	<b>(141.9)</b>

The value ascribed to the EBS net technical provisions represents the amount the Company would have to pay for an immediate transfer of its obligations to another insurer and is calculated as the sum of a best estimate and a risk margin.

The best estimate is calculated as a probability weighted average of future cash flows, discounted at a risk-free rate. Cash flows belonging to all legally obligated contracts are included in the valuation of the EBS net technical provisions and risk free rates are derived from yield curves supplied by the European Insurance and Occupational Pensions Authority (EIOPA) as equivalent to the BMA EBS framework. The key adjustments made between the UK GAAP and EBS bases for the best estimate technical provisions are:

- Allowance for the impact of discounting cash flows at a risk free rate;
- Incorporation of expected reinsurance counterparty defaults;
- Incorporation of events not in data;
- Adjustments related to differences in contract boundaries between the GAAP and EBS frameworks, most notably allowance for bound but not incepted business for the EBS; and
- Adjustments related to the consideration of investment expenses.

Similar to reserves reported under a GAAP basis, it should be noted that there is inherent uncertainty in reserve estimation. The Company explicitly quantifies and monitors the volatility in the reserves as part of its management capital, derived using an internal model.

The risk margin is calculated as the cost of providing an amount of capital equal to the Bermuda Solvency Capital Requirement necessary to support the insurance obligations over the lifetime thereof. This risk margin is also referred to as the market value margin.

### D.3 Description of recoverables from reinsurance contracts

Under the EBS framework, reinsurance recoverables are calculated as a probability weighted average of discounted future cash flows relating to reinsurance contracts, adjusted for the expected losses due to counterparty default. The recoverables allow for reinstatement premiums required to be paid to the reinsurer, and expenses in relation to the management and administration of reinsurance claims.

As at 31 December 2021, the only reinsurance recoveries and future premiums assumed for Brit Re relate to a single contract and result in an estimated technical provision on an EBS basis of less than \$0.1m. As such, the impact of reinsurance is not material on the technical provisions.

#### **D.4 Valuation bases, assumptions and methods used to derive the value of other liabilities under the EBS framework**

There are no differences between the valuation basis for other liabilities between the GAAP and EBS frameworks.

#### **D.5 Other information**

All relevant information regarding the Company's valuation methodologies is considered to be included in sections D.1 to D.4 above.

## E. Capital management

### E.1 Eligible Capital and Regulatory Capital Requirements

#### i. Capital management policy and process to determine capital needs for business planning, how capital is managed and any material changes during the reporting period

The Company has a Capital Policy that sets out the capital requirements and principles on funding, the approach to distribution of surplus capital and the level of liquidity required, and states the importance of ensuring that the Company is:

- Sufficiently capitalised at all times, and
- Complies with BMA regulatory requirements and all other applicable legislation.

Responsibility for managing compliance with this policy rests with the Board.

Capital management is an integral part of the annual business planning process and capital considerations are critical in making strategic decisions, for example writing a new business line. The Group's Chief Risk Officer reviews the annual business plan to determine any changes in the Company's risk profile and additional capital requirements. The Board is responsible for approving the business plan.

There were no material changes in capital and how it is managed during 2021.

#### ii. Eligible capital categorised by tiers in accordance with the Eligible Capital Rules used to meet the Enhanced Capital Requirement ("ECR") and the Minimum Margin of Solvency ("MSM")

The Company's regulatory capital requirements, available capital and solvency were as follows:

	2021 Consultation basis \$'m	2020 Consultation basis \$'m	2020 Transition basis \$'m
GAAP Statutory Capital and Surplus	1,053.8	1,086.6	1,086.6
EBS Available Capital	1,084.2	1,093.4	1,093.4
Minimum Solvency Margin	127.6	110.1	110.1
Bermuda Solvency Capital requirements (BSCR)/ Enhanced Capital Requirement <sup>1</sup>	510.2	450.4	428.6
Target Capital Level	612.3	540.4	514.4
Enhanced Capital Requirement Ratio (EBS Available Capital/ Enhanced Capital Requirement)	212%	243%	255%
Solvency ratio (Statutory Capital and Surplus / Target Capital Level)	172%	201%	211%

<sup>1</sup>Both the transition basis and consultation basis have been reported for the 2020 year end to provide more context to the current year reported amounts.

All of the Company's capital and surplus, as determined under the BMA's EBS framework, is comprised of Tier 1 capital, the highest quality of capital. Tier 1 capital is comprised of fully paid ordinary shares and non-distributed retained earnings.

There are no ancillary capital instruments.

The Company paid a dividend during the year of \$220.0m (2020: \$nil). The Directors do not recommend the payment of a final dividend (2020: \$nil).

**iii. Confirmation that eligible capital is subject to transitional arrangements as required under the Eligible Capital Rules**

Not applicable.

**iv. Factors affecting encumbrances on the availability and transferability of capital to meet the ECR**

None, the capital to meet the ECR is available and fully transferable.

**v. Identification of differences in shareholder's equity as stated in the Financial Statements versus available statutory capital and surplus.**

The Company prepares its financial statements in accordance with applicable accounting principles generally accepted in the UK relating to reinsurance companies (UK GAAP). The EBS balance sheet is derived from the UK GAAP balance sheet by making appropriate adjustments to the assets and liabilities. These are discussed in section D (Valuation for solvency purposes). The EBS balance sheet determines the shareholder's equity.

**vi. Compliance with the MSM and the ECR**

The Company was compliant with the MSM and ECR requirements at the end of the reporting period and is expected to remain compliant going forward.

**vii. Approved Internal Capital Model**

Not applicable – we have not applied to have the Company's internal capital model approved to determine regulatory capital requirements.

**viii. Any other Material Information**

All relevant information regarding the Company's capital is considered to be included in the sections above.

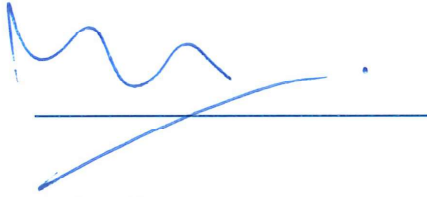


## F. Subsequent Event

None.

## Declaration Statement

To the best of our knowledge and belief, the financial condition report fairly represents the financial condition of Brit Reinsurance (Bermuda) Limited in all material respects.



Graham Pewter

Chairman

26 April 2022



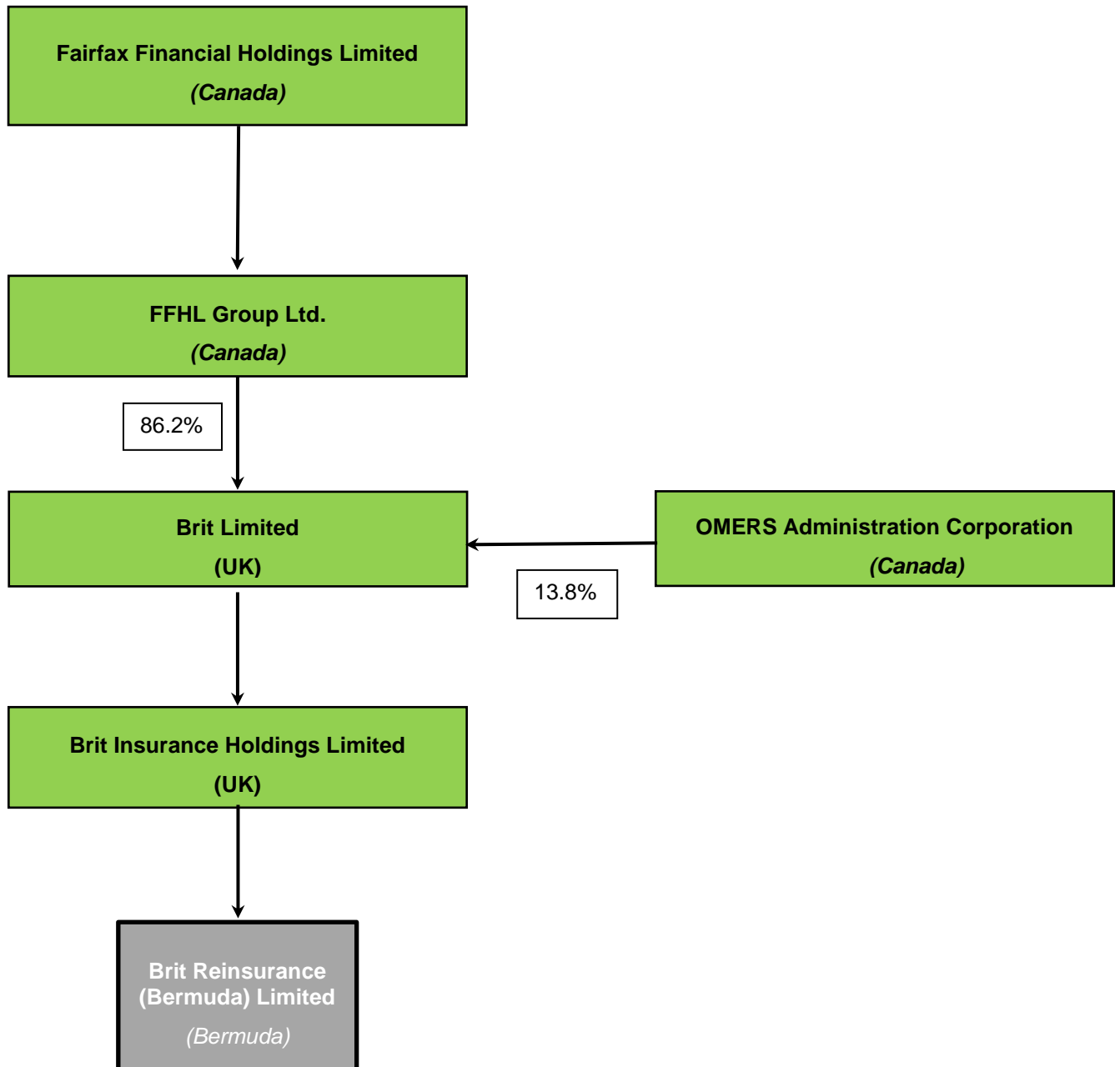
Karl Grieves

Finance and Operations Director (and the senior executive responsible for the compliance function)

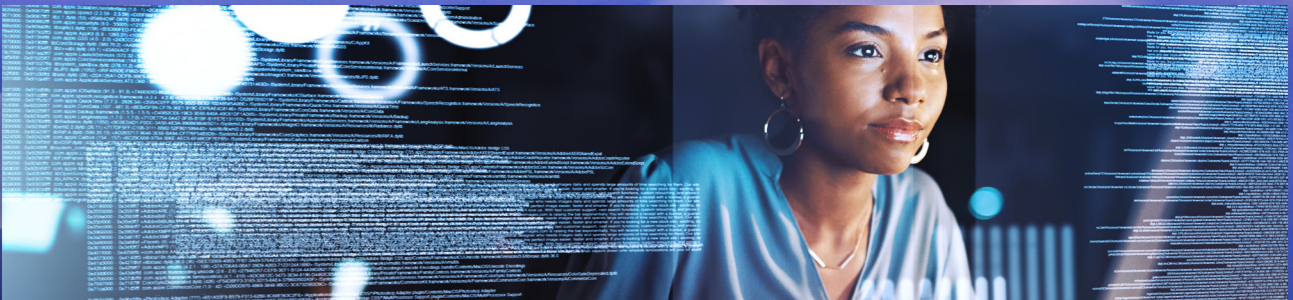
26 April 2022

APPENDIX I – Abbreviated Group Structure

Brit Reinsurance (Bermuda) Limited – ownership structure



**Brit Re**  
Ground Floor, Chesney House  
The Waterfront, 96 Pitts Bay Road,  
Pembroke, Hamilton HM 08, Bermuda  
[britinsurance.com](http://britinsurance.com)



**BRIT**  

---

**writing the future**