

Gresham Insurance Company Limited

Solvency and Financial Condition Report

Year ended 31 December 2016

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Gresham Insurance Company Limited

Solvency and Financial Condition Report

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Summary

The purpose of the Solvency and Financial Condition Report (SFCR) is to provide information about the capital position of the Company, at 31 December 2016, based on the Solvency II (SII) requirements.

The report sets out different aspects of the Company's business and performance, system of governance, risk profile, valuation methods used for solvency purposes and its capital management practices.

Business and Performance

The Company is a limited company registered in England and Wales and member of the Aviva plc group of companies. The Company transacts general insurance business in the United Kingdom through a business arrangement with Barclays Bank plc. The major class of business underwritten is personal lines home insurance. Whilst the Company only conducts non-life insurance activities, it also has life insurance obligations in relation to annuities stemming from non-life insurance contracts (PPO).

The Company made a profit before tax of £6m in the year ended 31 December 2016. This comprises an underwriting profit of £3m, net investment income of £1m and a profit from other activities of £2m.

Gross written premium fell by 8% in the year due to continued lower levels of sales and decreased retention. The majority of written premium is ceded to the Company's immediate parent Aviva Insurance Limited (AIL), through a quota share reinsurance arrangement, with levies being excluded from this arrangement. Gross claims of £55m benefited from benign weather during the year. Net claims are £nil due to the reinsurance arrangement with AIL.

The Company's net investment income comprised interest receivable and unrealised gains on the Company's holding of UK government securities. The Company received non-insurance income of £4m during the year.

Section A of this report sets out further details about the Company's key operations and financial performance over the reporting period.

System of Governance

The Board's responsibilities include ensuring that an appropriate system of governance is in place throughout the Company. To discharge this responsibility, the Board has established frameworks for risk management and internal control using a 'three lines of defence' model. However, the Board sets the Company's risk appetite itself. A strong system of governance throughout the Company aids effective decision-making and supports the achievement of the Company's objectives for the benefit of customers, shareholders and regulators. Key features of the Company's System of Governance are as follows:

- The roles and responsibilities of the Board are well defined;
- The Company's Board has delegated responsibilities to management within the Aviva Group to assist in its oversight of risk management and the approach to internal controls;
- The Company has implemented four key control functions – Risk Management, Actuarial, Compliance and Internal Audit;
- The Company has in place a remuneration policy, skills requirements and procedures for assessing the fitness and propriety of senior management and key function holders;
- The Company's risk strategy, appetite and framework, its approach to its Own Risk and Solvency Assessment (ORSA), and its governance over the use of the standard formula are set out in its Risk Management Framework policy and its risk policies and business standards;
- The Company's outsourcing strategy is supported by its Procurement and Outsourcing Business Standard.

Risk Profile

The Company's business is about protecting its customers from risk. As an insurer, the Company accepts the risks inherent to its core business line of non-life insurance.

The Company receives premiums which are invested in order to maximise risk-adjusted returns, so that the Company can fulfil its promises to customers while providing a return to its shareholders. In doing so, the Company has a preference for retaining those risks which it believes it is capable of managing to generate a return.

The types of risk to which the Company is exposed have not changed significantly over the year and remain credit, market, underwriting, liquidity and operational risks.

For those risk types managed through the holding of capital, the Company measures and monitors its risk profile on the basis of the SII Capital Requirement (SCR). Some categories of risk are not measured and managed solely by holding capital, principally liquidity risk, which is measured through both absolute level targets and bespoke liquidity coverage ratios.

Section C of this report further describes the risks to which the Company is exposed and how it measures, monitors, manages and mitigates these risks, including any changes in the year to risk exposures and specific risk mitigation actions taken.

Valuation for Solvency Purposes

Assets, technical provisions and other liabilities are valued in the Company's SII Balance Sheet according to the SII regulations. The basis of the SII valuation principle is the amount for which they could be exchanged, transferred or settled by knowledgeable and willing third parties in an arm's length transaction. The value of Technical Provisions under SII is equal to the sum of a Best Estimate Liability and a risk margin.

At 31 December 2016, the Company's excess of assets over liabilities was £80m on a SII basis which is £2m higher than the value under IFRS.

Section D of this report provides further description of the bases, methods and main assumptions used in the valuation of assets, Technical Provisions and other liabilities for each material asset/liability class. In addition, it also provides an explanation of the material differences between the IFRS and SII bases of valuation.

Capital Management

The Company manages Own Funds in conjunction with solvency capital requirements. In the calculation of the SCR, the Company has chosen to implement the standard formula (SF).

In managing capital, the Company seeks, on a consistent basis, to:

- Match the profile of its assets and liabilities, taking into account the risks inherent in the business;
- Maintain sufficient, but not excessive, financial strength in accordance with risk appetite to support new business growth and satisfy the requirements of the Company's regulators and other stakeholders, giving the Company's customers assurance of its financial strength;
- Retain financial flexibility by maintaining strong liquidity; and
- Allocate capital rigorously to support value adding growth and repatriate excess capital where appropriate.

At 31 December 2016, the total eligible Own Funds to meet the SCR was £80m all of which was represented by unrestricted tier 1 capital. The Company's SCR, at 31 December 2016, was £7m. The overall surplus position was £73m which translates to a regulatory cover ratio of 1,175%.

Section E of this report further describes the objectives, policies and procedures employed by the Company for managing its own funds. The section also covers information on structure and quality of Own Funds and calculation of SCR, including information about the Company's use of SF.

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A. Business and Performance

[In this Chapter](#)

A.1 Business

A.2 Underwriting Performance

A.3 Investment Performance

A.4 Performance of Other Activities

A.5 Any Other Information

A. Business and Performance

The ‘Business and Performance’ section of the report sets out the Company’s business structure, key operations, and financial performance over the reporting period.

A.1 Business

The Company is a limited company registered in England and Wales and is a member of the Aviva plc group of companies, (the Group).

Qualifying holdings

The Company’s shares and the associated voting rights are wholly owned by ALL, being a qualifying holding in the Company.

Supervisor

The Company is authorised by the Prudential Regulatory Authority (PRA). The Company and the Group are regulated by the PRA and the Financial Conduct Authority (FCA) in the UK. The PRA is part of the Bank of England. Contact details for the PRA are as follows:

Address 20 Moorgate, London, EC2R 6DA
Telephone number +44 (0) 20 7601 4444

External auditor

The Company’s external auditor is PricewaterhouseCoopers LLP. Contact details are as follows:

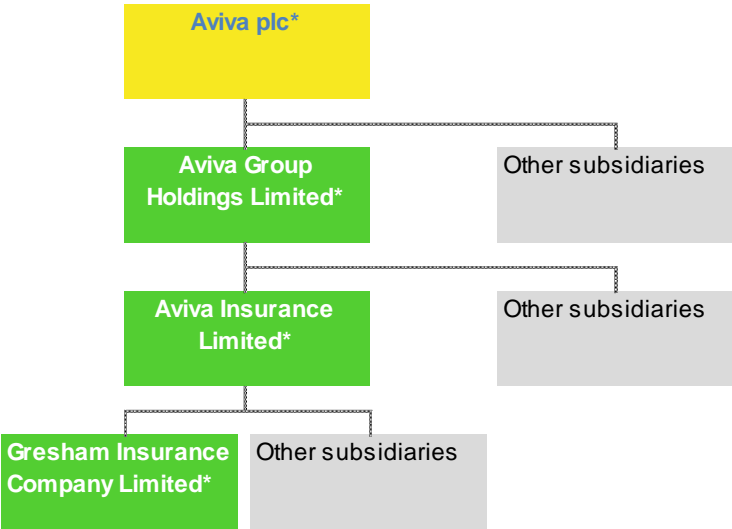
Address 7 More London Riverside, London, SE1 2RT
Telephone number +44 (0) 20 7583 5000

Financial statements

The Company’s financial statements are available from the Company Secretary, Aviva Company Secretarial Services Limited, St Helen’s, Undershaft, London, EC3P 3DQ.

A.1.1 Organisation

The following chart shows, in simplified form, the Company’s position within the structure of the Group as at 31 December 2016:



* Incorporated in the United Kingdom

Gresham Insurance Company Limited is a subsidiary of Aviva Insurance Limited, which is registered in Scotland. Aviva plc is the ultimate controlling parent entity registered in England.

A.1.2 Business operations and events occurring in the year

Business operations

The only material SII line of business underwritten by the Company is Fire and Other Damage to Property. The Company underwrites its business in the UK, as presented in QRT S.05.02 (Appendix F.1).

Whilst the Company only conducts non-life insurance activities, it does have life insurance obligations in relation to annuities stemming from non-life insurance contracts (PPO).

Significant business and other events

The SII regime came into effect from 1 January 2016. The Company has adopted a SF approach to calculating its SCR.

A.2 Underwriting Performance

A.2.1 Measurement of underwriting performance

The Company uses underwriting result to measure its underwriting performance. Underwriting result is a non-GAAP financial performance measure, calculated on an IFRS basis. It excludes certain items to enhance comparability and understanding of underwriting performance by highlighting net income attributable to on-going underwriting operations. Examples of items excluded from underwriting result are investment return, economic assumption changes, and non-insurance income. The items excluded from underwriting result, which comprise the Company's investment performance and its performance of other activities, are detailed in sections A.3 and A.4 respectively.

The Company made a profit before tax of £6m in the year ended 31 December 2016. This comprises an underwriting profit of £3m, net investment income of £1m and a profit from other activities of £2m, as shown in the table below.

Reconciliation of underwriting result to profit before tax			
For the year ended 31 December 2016			
£m			
Profit for the year before tax			6
Less: net investment income (see A.3)			(1)
Add back: Other costs		2	
Less: non-insurance income		(4)	
Performance of other activities (see A.4)			(2)
Underwriting profit			3

A.2.3 Underwriting performance during the year

A summary of the information provided in the premium, claims and expenses QRT is provided in the table below. The net result of £5m comprises the underwriting result of £3m and the profit from other activities of £2m.

For the year ended 31 December 2016	Fire and other damage to property insurance	Other	Total
£m			
Gross written premium	159	5	164
Net earned premium	8	-	8
Gross claims incurred	(51)	(4)	(55)
Net claims incurred	1	(1)	-
Net expenses incurred	(7)	-	(7)
Total expenses			(3)

The Company's gross written premium decreased by 8% due to continued lower level of sales and decreased retention driving reduced policies in force year-on-year. The majority of written premium is ceded to the Company's parent AIL, through a quota share reinsurance arrangement, with levies being excluded from this arrangement.

Gross claims benefited from favourable weather during the year. Net claims incurred were £nil reflecting the reinsurance arrangement with AIL.

Net expenses incurred increased during the year due to the introduction of the Flood Re Levy. Total expenses included non-insurance income of £4m, (see A.4).

A.3 Investment Performance

The Company's net investment income for the year of £1m comprised interest receivable and unrealised gains on the Company's holding of financial investments in UK government securities. Net investment income is stated after the deduction of immaterial investment expenses.

A.4 Performance of Other Activities

A.4.1 Other income and expense

As described in section A.2.1, performance of other activities comprises those items of other income and expense, other than net investment return, excluded from underwriting result. The Company delivered a profit before tax of £6m, of which £2m arose from its performance of other activities during the year, the material components of which are as follows:

Non-insurance income

The company's non-insurance income for the year was £4m. Non-insurance income arises from items, such as legal expenses, sold as add-ons to existing policies; this income has fallen during the year in line with premium.

A.5 Any Other Information

There is no other material information to report regarding the Company's Business and Performance.

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B. System of Governance

[In this Chapter](#)

- B.1 General Information on the System of Governance
- B.2 Fit and Proper Policy
- B.3 Risk Management System including the Own Risk and Solvency Assessment
- B.4 Internal Control System
- B.5 Internal Audit Function
- B.6 Actuarial Function
- B.7 Outsourcing
- B.8 Any Other Information

B. System of Governance

This section of the report sets out information regarding the 'System of Governance' in place within the Company. Details of the structure of the undertaking's 'administrative, management or supervisory body' (defined as the Board) are provided. The roles, responsibilities and governance of key functions (defined as the Risk, Compliance, Internal Audit and Actuarial Functions) are also provided. Other components of the System of Governance are also outlined, including the risk management system and internal control system implemented across the business.

B.1 General Information on the System of Governance

B.1.1 Board structure

The Company's Board is responsible for promoting the long-term success of the Company and for setting its strategy. It sets the Company's risk appetite and satisfies itself that financial controls and risk management systems are robust. A strong system of governance throughout the Company aids effective decision making and supports the achievement of the Company's objectives for the benefit of policyholders and the shareholder.

The duties of the Company's Board are set out in its terms of reference. The terms of reference lists both those items that are specifically reserved for decision by the Board and those matters that must be reported to the Board. The Company's Board is composed of senior management from within the Group and a Director appointed by Barclays Bank plc.

The Company's Board has delegated responsibilities to management within the Group to assist in its oversight of risk management and the approach to internal controls.

The 'three lines of defence model', and roles and responsibilities of key functions

Roles and responsibilities for risk management in the Company are based around the three lines of defence model.

The first line

Management are responsible for the application of the Risk Management Framework and for implementing and monitoring the operation of the system of internal control, and for providing assurance to the Board.

The second line

- The Risk Function is accountable for the quantitative and qualitative oversight and challenge of the identification, measurement, management, monitoring and reporting of principal risks and for developing the Risk Management Framework;
- The Compliance Function supports and advises the business on the identification, measurement and management of its regulatory, financial crime and conduct risks and is accountable for monitoring and reporting on the Company's compliance risk profile.
- The Actuarial Function is accountable for actuarial methodology, reporting to the relevant governing body on the adequacy of reserves and capital requirements, as well as underwriting and reinsurance arrangements; and

The third line

The Internal Audit Function provides independent and objective assessment on the robustness of the Risk Management Framework and the appropriateness and effectiveness of internal control to the Board.

Sections B.3.2, B.4.2, B.5 and B.6 detail the roles, responsibilities, authority, resources, independence and reporting lines of the Risk, Compliance, Internal Audit and Actuarial Functions respectively, and how their independence is ensured.

B.1.2 Material changes in the system of governance

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

B.1.3 Adequacy of the Company's system of governance

An assessment of the effectiveness of the governance, internal control and risk management systems of the parent company and several of its subsidiaries, including the Company, was conducted half-yearly in 2016, leading to the parent company's Chief Executive Officer (CEO) certifying that:

- There are sound risk management and internal control systems that are effective and fit for purpose in place across the business;
- Material existing or emerging risks within the business have been identified and assessed; and
- The business operates in a manner which conforms to the minimum requirements outlined in the Company's risk policies and business standards.

The parent company's Chief Risk Officer (CRO) provided his own certificate which states that:

- The Risk Function has reviewed and challenged the process supporting the CEO's certification and is satisfied that it can provide reasonable assurance of the material accuracy and completeness of the CEO's assessment; and
- No material gaps exist in the Risk Management Framework.

Any material risks not previously identified, control weaknesses or non-compliance with the Company's risk policies and business standards or local delegations of authority are highlighted as part of this process. The results of the certification process and details of key failings or weaknesses are reported to the Board to enable them to carry out an effectiveness assessment. The Board last carried out a full review of the effectiveness of the Company's systems of internal control and risk management in March 2017.

B.1.4 Remuneration policy and practices

All staff are employed by a fellow subsidiary of Aviva plc, Aviva Employment Services Limited, and a recharge is made to the Company. All Aviva staff acting on behalf of the Company are subject to Aviva's remuneration policy, which is designed to incentivise and reward employees for achieving business goals in a manner that is consistent with Aviva's strategy, business plans, values and behaviours, sound and effective risk management and good governance.

The directors of the Company receive no remuneration from the Company.

The director appointed by Barclays Bank plc is remunerated in line with practices within Barclays Bank plc.

Executive directors

Aviva's remuneration policy provides market competitive remuneration. Remuneration of executive directors includes a basic salary, variable components, pension contributions and benefits including relocation and mobility. This incentivises executive directors to achieve both the annual business plan and through significant levels of deferral the longer-term strategic objectives of the businesses for which they are responsible. As well as rewarding the achievement of objectives, variable remuneration can be zero if performance thresholds are not met.

Employees

Remuneration arrangements for Aviva employees that are not executive directors take account of the seniority and nature of the role, and individual performance. The aim is to provide employees with remuneration packages that are clear and simple to understand, transparent, consistent and fair. Remuneration includes a basic salary, variable components and pension contributions.

The variable components are discretionary and fully flexible as opposed to a contractual entitlement, and there is a possibility of zero awards being made should the performance of the relevant businesses or individuals require this. Individual awards are based on a calibrated assessment of performance of individuals relative to peers.

The remuneration of employees in Risk, Compliance, Internal Audit and Actuarial Functions is determined independently of the financial results of the business areas they oversee. This reinforces the independence of these Functions.

Performance criteria for share awards

Shares in Aviva plc can be awarded to both executive directors and employees. These vest after three years, in some cases dependent on performance conditions. Current performance targets are based on two measures. The first measures return on equity and is set as a percentage. The second compares total shareholder return to other similar companies. Half of the Long Term Incentive Plan vests if return on equity exceeds 30% over the three-year performance period. The other half vests if the total shareholder return is in the upper quintile when compared to the other companies over the three year period.

Pension and early retirement schemes

There were no enhanced pension arrangements or early retirement schemes for members of the Board or key function holders in place during 2016.

B.1.5 Material transactions with the shareholder, persons with significant influence on the Company and members of the Board

The Company has a quota share reinsurance arrangement with AIL, with effect from 1 January 2006. The key terms of the agreement remain: a 100% cession rate on premiums, claims costs and underwriting expense costs is applied in respect of the underwriting year; and a requirement for the Company to retain a percentage in relation to levies.

The key management of the Company are considered to be the statutory directors of the Company. Note 4 to the financial statements, gives details of their compensation as directors of the Company.

B.2 Fit and Proper Policy

B.2.1 Requirements for the persons who run the Company or who are other key function holders

The membership of the Board is designed to provide skills necessary to manage the Company's underlying business activities and key risks. Specific skills considered within Board appointments include knowledge and experience in respect of:

- Insurance and financial markets;
- Business strategy and business models;
- System of governance;
- Financial and actuarial analysis; and
- Regulatory framework and requirements.

The Company's requirements in respect of skills, knowledge and expertise for key function holders are set following engagement with both internal and external subject matter experts in each specialism. These requirements and qualifications are captured within individual role descriptions for each key function role.

B.2.2 Process assessing fitness and propriety

The Company has implemented processes to ensure that individuals acting on its behalf are both fit and proper in line with the PRA Fit and Proper requirements for individuals subject to the Senior Insurance Managers Regime and the FCA requirements for Approved Persons. This means that as part of recruitment and employee screening an individual's career history will be assessed and validated to establish whether an individual's skills and knowledge are appropriately matched to the role. It also means that checks are in place to ensure that an individual is honest, of good reputation, has integrity and is financially sound.

The governance over the fitness and propriety of individuals includes recruitment, performance management and training. However, to ensure that the Company protects itself against employing individuals who potentially could threaten its customers,

properties, facilities or reputation, the majority of its fitness and propriety processes take place at recruitment and more specifically at pre-employment screening. A minimum set of basic screening requirements has been agreed and implemented. Additional enhanced screening requirements are applied for individuals who will run the Company or become key function holders.

Compliance with the initial and ongoing fitness and propriety minimum requirements was reported half-yearly to the Board in 2016.

B.3 Risk Management System including the Own Risk and Solvency Assessment

B.3.1 Risk Management Framework

The Risk Management Framework forms an integral part of management and Board processes and the decision-making framework across the Company. The key elements are:

- Risk appetite;
- Risk governance, including risk policies and business standards and roles and responsibilities; and
- The processes used to identify, measure, manage, monitor and report risks (IMMMR), including the use of risk models and stress and scenario testing.

For the purposes of risk identification and measurement risks are usually grouped by risk type: credit, market, liquidity, general insurance and operational risk. Risks falling within these types may affect a number of metrics, including those relating to balance sheet strength, liquidity and profit. They may also affect the performance of products delivered to customers and service provided to customers and distributors, which can be categorised as risks to brand and reputation or as conduct risk.

To promote a consistent and rigorous approach to risk management the Company has adopted a number of risk policies and business standards which set out the risk strategy, appetite, framework and minimum requirements for its operations. Compliance with these policies and standards is confirmed half-yearly.

A regular top-down key risk identification and assessment process is carried out by the Risk Function. This includes the consideration of emerging risks and is supported by deeper thematic reviews. The risk assessment processes are used to generate risk reports which are shared with the Board.

Risk models are an important tool in the measurement of risks and are used to support the monitoring and reporting of the risk profile and in the consideration of the risk management actions available. A range of stress (where one risk factor, such as equity returns, is assumed to vary) and scenario (where combinations of risk factors are assumed to vary) tests are undertaken to evaluate their impact on the business and the management actions available to respond to the conditions envisaged.

The Risk Function is accountable for quantitative and qualitative oversight and challenge of the IMMMR process and for developing the Risk Management Framework. Internal Audit provides an independent assessment of the risk framework and internal control processes.

Board oversight of risk and risk management across the Company is maintained on a regular basis. The Board has overall responsibility for determining risk appetite, which is an expression of the risk the business is willing to take. Risk appetites are set relative to capital and liquidity.

The Company's position against risk appetite is monitored and reported to the Board on a regular basis. Long-term sustainability depends upon the protection of franchise value and good customer relationships. As such, the Company has a risk preference that it will not accept risks that materially impair the reputation of the Company and requires that customers are always treated with integrity. The oversight of risk and risk management is supported by two management committees, the Asset and Liability Committee (ALCO), which focuses on insurance and financial risks, and the Operational Risk Committee, which focuses on operational and reputational risks.

B.3.2 Risk Function

The Risk Function is responsible for the design and implementation of the Risk Management Framework. The Risk Function reports to the Company's Board on material risks, together with any other specific areas of risk requested by the Board, and assists the Board and management in the effective operation of the Risk Management Framework including, amongst other things, the provision of specialist analysis and quality reviews, an aggregated view of the risk profile, and an assessment of the key risks associated with the business's strategy, major projects, strategic investments and other key decisions.

The Risk Function has authority to review all areas of the Company and has full, free and unrestricted access to all activities, records, property and personnel necessary to complete its work. The CRO has direct management accountability for the Risk Function.

B.3.3 ORSA

The Company considers that its ORSA comprises all the processes and tools that underpin the consideration of risk and capital implications in key decisions, including business planning. It provides a continuous and forward-looking assessment of the short-term and long-term risks that the Company faces, or may face, and ensures that its capital requirements are met at all times.

The ORSA therefore comprises a number of elements of the Risk Management Framework, which are embedded in the business through the requirements of the business standards around capital allocation, strategy, business planning and stress testing. These elements create an overview of the impact of risk on the business, which are taken into account by management in day-to-day decision making. In particular, using economic capital in decision making ensures risk and capital management are connected. The outcomes of the ORSA processes provide the Company's Board and management with insights on the key risks and current and future capital requirements.

The CEO and his direct reports are responsible for the majority of the underlying ORSA processes set out above. The Risk Function is responsible for the design of the Risk Management Framework, including the ORSA, the annual ORSA effectiveness review and annual ORSA reporting.

Review and approval

The outputs from the ORSA processes are reported to and reviewed by the Board regularly during the year. The Board sets the approach to the ORSA and oversees the ORSA processes. The results of the Company's ORSA processes are considered by the Board when reviewing the Company's strategy and plans.

The annual ORSA Report brings together and summarises a high level description of the key components of ORSA, together with key developments and outcomes during the year. This is submitted to the Board, and subject to its approval, shared with the PRA.

The Board has approved the use of the SF SCR as its own view of capital (also described as the Pillar II Capital Metric) and set a specific Solvency II risk appetite cover ratio as a percentage of the SF SCR.

Economic capital (as a risk based capital measure) is embedded in the Company's Risk Management Framework and is used as an input to a range of business and strategic decisions. The framework, supported by risk policies and business standards, sets out the areas where economic capital management information must be used as part of decision making and risk management processes. This ensures that requirements to use economic capital are embedded within the relevant processes including, but not limited to, strategy and planning. Economic capital is calculated using the SF calculation, the appropriateness of which is reviewed annually and reported to the Board.

B.4 Internal Control System

B.4.1 System of Internal Control

The Company's principles for ensuring effective internal control are set out in the Risk Management Framework and, in particular, the Internal Control Business Standard. These include:

- An appropriate "tone from the top". This supports the effective management of exposures, adequate resourcing, effective communication, malpractice reporting, a business ethics code that is annually signed up to by employees, and a commitment to integrity, ethical behaviour and compliance;
- A clear organisational structure that supports the system of internal control and includes the effective operation of an adequately resourced three lines of defence model, appropriate and proportionate segregation of duties, a clear system of delegated authorities, clearly defined roles and responsibilities for staff, and the consideration of risk management and control responsibilities when setting objectives for and reviewing the performance of all staff;
- Implementation of risk policies and business standards, and consistent IMMMR of all risks;
- Effective controls for each of its core business processes which are regularly monitored and reported on; and
- A risk oversight process that provides adequate challenge to the completeness and openness of internal control and risk assessment.

B.4.2 Compliance Function

The primary purpose of the Compliance Function is to assess and manage exposure to regulatory risk. The Compliance Function is an integral part of the Risk Management Framework and constitutes a key part of the Company's corporate governance, including relationships with the FCA and the PRA, and other regulatory bodies. The Compliance Function is a critical contributor to the safe and sound operation of the Company and underpins the achievement of its strategy and business goals. The key processes that comprise the Company's compliance activity are:

- Conduct regulatory risk management (including monitoring regulatory developments), performed by the Compliance Function and including activities such as:
 - Setting conduct and financial crime policy framework;
 - Providing advice, support, guidance and challenge on conduct and financial crime risk; and
 - Managing conduct and financial crime regulatory engagement.
- Prudential regulatory risk management (including monitoring regulatory developments), performed by the Risk Function and including activities such as:
 - Setting prudential regulatory risk policy framework;
 - Providing advice, support, guidance and challenge on prudential regulatory risk; and
 - Managing prudential regulatory engagement.
- Legal developments monitoring, performed by the Legal and Company Secretarial Function.

Through these processes the Compliance, Risk and Legal Functions also take responsibility for reporting information to the Board. The Board receives a report from the CRO annually which covers any material concerns regarding conduct risk and the treatment of customers generally, along with details and an assessment of the adequacy of management's response.

The CRO has responsibility for prudential and conduct regulatory risk management, whilst the General Counsel is responsible for monitoring legal developments. Those carrying out compliance activities have authority to review all areas of the Company and have full, free and unrestricted access to all activities, records, property and personnel necessary to complete their work, where appropriate.

B.5 Internal Audit Function

The Company's Internal Audit Function is led by the Internal Audit Director who reports directly to the Group Chief Audit Officer and to the Chairman of the parent company's Audit Committee.

The Internal Audit Function provides reports to the Company's Board on the robustness of the Company's Risk Management Framework and the appropriateness and effectiveness of the system of internal control. In doing this it considers the adequacy of the Company's system of internal control to manage its business risk and to safeguard its assets and resources. It also considers the effectiveness of any actions put in place by management to address any deficiencies that might exist in the system of internal control.

The Internal Audit Function investigates and reports on cases of suspected financial crime and employee fraud and malpractice, and undertakes designated advisory projects for management.

Independence and objectivity

The Internal Audit Function maintains its independence and objectivity by reporting directly to the Group Chief Audit Officer and the Chairman of the parent company's Audit Committee. The parent company's Audit Committee has a duty to recommend the appointment or dismissal of the Internal Audit Director to the parent company Board and to participate, jointly with the Group Chief Audit Officer or designee, in the determination of the objectives of the Internal Audit Director and the evaluation of his levels of achievement, including consultation with the CEO.

The Internal Audit Director proposes a budget which ensures that Internal Audit has sufficient skills and resources to discharge its responsibilities. The Internal Audit Function is authorised to review all areas of the Company and has full, free, and unrestricted access to all activities, records, property, and personnel necessary to complete its work.

Internal Audit Function staff have no direct responsibility for any operational activities. There is a formal policy of rotating staff to ensure that independence is maintained. There is also a restriction on the audits that staff who have previously worked elsewhere in the Company can perform. The Internal Audit Function cannot perform any projects for management that will threaten its actual or perceived independence and objectivity.

An annual declaration of independence is signed by all members of the Internal Audit Function's staff.

B.6 Actuarial Function

The Actuarial Function is accountable for actuarial methodologies and calibrations, plus the resultant Best Estimate Liabilities and capital requirements. The Actuarial Function produces an annual report to the Board providing all of the information necessary for the Company's Board to form their own opinion on the adequacy of Technical Provisions and on the Company's underwriting and reinsurance arrangements.

The independence of the Actuarial Function is derived through its membership of the wider Risk Function. The Actuarial Function is led by the Chief Risk Actuary, who reports to the Company's CRO. All persons employed by the Actuarial Function in a defined actuarial role are subject to the Fit and Proper policy requirements to ensure they have the requisite skills and knowledge to complete their responsibilities. (Fit and Proper requirements are considered in section B.2.)

The Actuarial Function has the authority to review all areas of the Company and has full, free and unrestricted access to all activities, records, property and personnel necessary to complete its work.

B.7 Outsourcing

Policy

The Procurement and Outsourcing Business Standard contains information on the Company's outsourcing policy, setting out the relevant responsibilities, objectives, process, and monitoring arrangements to be applied in cases of outsourcing, all of which shall be consistent with the overall strategy. The standard applies equally to any externally or internally (intra-group) outsourced activity. The objective of this standard is to ensure that minimum control objectives and controls for supplier related activities are followed by all elements of the business, to ensure that supply risk is managed effectively, customers are being treated fairly and continue to receive good outcomes, as well as mitigating potential financial, operational, contractual, and brand damage caused by inadequate management.

The Business Standard aligns with UK regulatory expectations, the FCA, the PRA, and the SII framework and where appropriate, regulatory guidance will be applied as a requirement. The standard applies to all staff involved in supplier related activities and provides direction to staff on their roles and responsibilities in effectively managing supplier activity. It provides clarity on the definition of outsourcing, including where activity is delegated to an intermediary, and whether a function or activity outsourced is assessed as critical or important. All staff have a responsibility to comply with this standard if they are involved with supplier related activity.

The objectives and controls in the Business Standard cover the following areas:

- Supply governance: business oversight of operational performance for sourcing and supply management activities;
- Sourcing: how a service provider of suitable quality is selected;
- Supplier contracting and approvals: financial, commercial and legal approval of contracts; and
- Supplier management and business continuity: risk based approach to management of supply contracts.

Critical or important outsourcing will attract the highest level of rigour, including regulatory notification, performance and relationship reviews, regulatory compliance review, risk and control assessments.

Critical and important outsourced functions and activities

The Company receives a wide range of services from within the Group. Various claims handling and fulfilment activities, including travel claims handling, loss adjusting and property repairs are outsourced to companies outside the Group.

Jurisdiction of service providers

Services provided from within the Group and claims handling and fulfilment activities are carried out in the UK.

B.8 Any Other Information

The Company has no other material information to disclose.

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C. Risk Profile

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- C.1 Underwriting Risk
- C.2 Market Risk
- C.3 Credit Risk
- C.4 Liquidity Risk
- C.5 Operational Risk
- C.6 Other Material Risks
- C.7 Any Other Information

C. Risk Profile

This chapter provides information on the Company's Risk Profile.

C.1 Underwriting Risk

C.1.1 Exposure

The Company's exposure to non-life insurance underwriting risk arises from:

- Inadequate claims reserving assumptions;
- Unforeseen fluctuations in the timing, frequency and severity of claims and claim settlements relative to expectations;
- Unexpected claims arising from a single source;
- Inaccurate pricing of risks or inappropriate underwriting of risks when underwritten; and
- Inadequate reinsurance protection or other risk transfer techniques.

The Company underwrites only household insurance, transacted through a business arrangement with Barclays Bank plc. There are also some outstanding reserves in respect of motor business that was underwritten previously.

The Company has a quota share arrangement with its parent company, AIL, with effect from 1 January 2006. The majority of written premium is ceded to AIL, with levies being excluded from this arrangement.

There were no material changes to the Company's underwriting risk profile over the year to 31 December 2016.

The Company's overall exposure to underwriting risk is measured using the SCR. QRT S.25.02 (Appendix F.1.7) shows that the Company's undiversified SCR for underwriting risk is immaterial. Underwriting risk is also measured and monitored in terms of best estimate liabilities, total sum insured and estimated maximum loss. Estimated maximum loss is an estimation of the maximum loss that could be reasonably sustained as a result of a single incident considered to be within the realms of probability.

C.1.2. Risk concentration

The Company's general insurance business is UK domiciled, and managed and priced in the UK. Its most concentrated non-life underwriting peril is North European Windstorm. The business written is sold exclusively via Barclays Insurance Services Company Limited.

C.1.3 Risk mitigation

The Company manages its exposure to general insurance risk through the application of controls frameworks that include:

- Claims reserving that is undertaken by local actuaries and is also subject to periodic external review;
- Extensive use of data, financial models and analysis to improve pricing and risk selection;
- Underwriting limits linked to delegations of authority that govern underwriting decisions;
- Product development in a management framework that ensures products and propositions meet customer needs;
- Product limits and exclusions; and
- Governance of outsourced functions writing products on behalf of the Company.

The primary technique used to mitigate underwriting risk is reinsurance as described in section C1.1.

The management of insurance risk is overseen by the Board and as part of the wider AIL senior management committees, namely the AIL ALCO, the AIL Insurance Committee and the AIL Reserve Committee.

C.1.4 Stress and scenario testing and sensitivity analysis

Descriptions of the methods used, assumptions made and outcomes of stress and scenario testing and sensitivity analysis is provided in section C.7.1.

C.1.5 Special purpose vehicles

The Company has not transferred underwriting risk to special purpose vehicles, as defined by the SII Directive.

C.2 Market Risk

C.2.1 Exposure

The Company's exposure to market risk arises from the risk of adverse financial impact resulting directly or indirectly from fluctuations in interest rates and inflation. Market risk arises due to fluctuations in both the value of liabilities and the value of assets held.

Given the reinsurance the Company has in place as outlined in section C1.1, the Company is primarily exposed to fluctuations in interest rates affecting the value of its debt securities.

The Company operates in the UK and there is no exposure to foreign currency exchange rates.

There has been no material change in The Company's overall market risk exposure during the period.

The Company's overall exposure to market risk is measured using the SCR. QRT S.25.02.21 (Appendix F.1.7) shows that the Company's undiversified SCR for market risk is £1m. This includes credit risk in respect of the Company's bond holdings whose risk profile and management is described in section C.3.

C.2.2 Risk concentration

The Company holds cash and gilts. It is thus exposed to a concentration of UK Government Bonds. Cash is invested in liquidity funds.

C.2.3 Risk mitigation

The Company manages market risk locally as part of the wider market risk framework, within local regulatory constraints and in line with established Group policy. The management of market risk is overseen by the AIL ALCO.

The Company did not have any derivatives during the year or at year-end.

C.2.4 Stress and scenario testing and sensitivity analysis

Descriptions of the methods used, assumptions made and outcomes of stress and scenario testing and sensitivity analysis is provided in section C.7.1.

C.3 Credit Risk

C.3.1 Exposure

The Company's exposure to credit risk arises from the risk that it will incur a financial loss from the default or failure of third parties to meet their payment obligations to the Company, or variations in market values as a result of changes in expectations related to these risks.

The Company's approach to managing credit risk recognises that there is a risk of adverse financial impact resulting from fluctuations in credit quality of third parties including default, rating transition and credit spread movements. The Company's credit risks arise principally from exposures to debt securities, insurance debtors, reinsurance counterparties and bank deposits.

The Company's management of credit risk includes implementation of credit risk management processes as part of the wider risk framework (including limits frameworks), the operation of specific risk management committees, and detailed reporting and monitoring of exposures against pre-established risk criteria. The management of credit risk is overseen by the AIL's ALCO.

The principal basis used to measure the Company's exposure to counterparty credit risk is the SCR. QRT S.25.02 (Appendix F.1.7) shows that the Company's undiversified SCR for counterparty risk is £5m. Counterparty risk relates to the risk associated with reinsurers and insurance debtors. The Company is additionally exposed to the credit risk associated with debt securities included in the market risk SCR reported in the QRT as described in section C.2.1. There has been no material change in the Company's counterparty risk exposure over the reporting period.

The following metrics are also used when measuring and assessing its credit risk exposure and to support risk management actions and investment decisions as part of the monitoring undertaken within the wider UK&I GI framework:

- Maximum exposure: credit exposure of the Company's financial assets to counterparties; and
- External credit rating: available Moody, Standard & Poor and Fitch ratings.

The overall credit quality of the Company's financial investments is strong. At 31 December 2016, all debt securities were held with the UK Government (£65m) and rated AA. Similarly, reinsurance assets all had with external credit ratings of A or above. Cash and cash equivalents are held with highly rated banking institutions or liquidity funds.

C.3.2 Risk concentration

The Company has exposure to its immediate parent AIL via the reinsurance quota share arrangement discussed in section C.1.1. At 31 December 2016, the reinsurance asset recoverable from AIL is £121m. This asset is neither impaired nor overdue. As at 31 December 2016, and after allowing for Deferred Acquisition Costs, this counterparty risk exposure is legally offset against a creditor balance with AIL associated with future premium payments. The Company is also a named party to Group wide external catastrophe reinsurance arrangements, and hence could independently access external catastrophe reinsurance recoveries due.

The Company's exposure to receivables of £91m at 31 December 2016 primarily comprises amounts due from insurance contract holders which are neither impaired nor overdue.

C.3.3 Risk mitigation

As described in section C.3.1, the Company has in place a credit control framework to manage credit risk.

In accordance with the requirements of the Financial Risk Mitigation Business Standard the effectiveness of arrangements to mitigate credit risk are assessed and documented as part of the wider assessment. On-going monitoring is carried out by reporting management information to the AIL ALCO and the Board, against pre-defined trigger points, to enable appropriate oversight and to prompt action if effectiveness deteriorates.

C.3.4 Stress and scenario testing and sensitivity analysis

Descriptions of the methods used, assumptions made and outcomes of stress and scenario testing and sensitivity analysis is provided in section C.7.1.

C.4 Liquidity Risk

C.4.1 Exposure

The Company's exposure to liquidity risk arises from the risk that its liabilities cannot be settled, in a timely and cost-effective manner, as they fall due because of insufficient liquid assets. Liquidity risk may arise from uncertainty of the value and timing of liabilities or the ability to realise assets to produce cash to meet obligations. The Company assesses liquidity risk under a range of scenarios and various levels of liquidity stress. Sources of liquidity risk include:

- Insurance underwriting e.g. unexpected catastrophe claims arising from adverse weather events;
- Variances of actual operational cash flow from shorter-term forecasts; and
- Timing mismatches between claims payments, premium income and reinsurance recoveries.

The principal bases used to measure and assess the Company's exposure to liquidity risk are absolute liquidity coverage relative to pre-defined appetites and the quantum of certain liquid assets. These are calibrated to ensure sufficient liquidity to meet expected

liquidity requirements following an extreme liquidity-specific stress event. During the year these appetites were recalibrated to make allowance for both short-term and long-term stress scenarios.

There were no material changes in the assessment of liquidity risks throughout the year and the Company's liquidity profile was maintained within appetite.

C.4.2 Risk concentration

The credit limit framework described in section C.3.1 above also avoids concentrations of liquidity risk by preventing investment in a restricted number of issuers, asset classes and sectors. The Company's investment strategy ensures it has sufficient liquid funds to meet its expected obligations as they fall due.

C.4.3 Risk mitigation

The Company manages its liquidity risk by considering the liquidity impact before accepting new risks and managing its existing liquidity profile by:

- Daily monitoring of projected short-term cash flow needs;
- Setting liquidity risk appetites which require that sufficient liquid resources be maintained to cover net outflows in a stress scenario over a range of timeframes;
- Defining trigger levels that enable action to be taken before those levels are breached; and
- Its parent, AIL, maintaining a liquidity risk management plan which details management actions to address liquidity funding requirements in a significant stress scenario that includes consideration of the Company.

In extreme circumstances, the Company could, in addition, approach the Group or AIL for additional short-term borrowing whilst the Company liquidated other assets. The Aviva Group maintains significant committed borrowing facilities from a range of highly rated banks to mitigate this risk further. AIL maintains significant liquidity including consideration of its reinsurance obligations to the Company.

The Company monitors the effectiveness of liquidity risk mitigation techniques as follows:

- The internal controls that enable effective liquidity risk management are subject to assurance testing as part of wider testing undertaken within AIL to ensure they operate effectively;
- Liquidity positions are regularly reported to and monitored by the AIL ALCO against pre-defined trigger points to enable appropriate oversight and actions to take place if effectiveness deteriorates.

C.4.4 Expected Profit Included Future Premiums (EPIFP)

The amount of EPIFP, calculated in accordance with Article 1 of the SII regulations and included within the valuation of the Company's Technical Provisions as at 31 December 2016 is £nil. (See the Own Funds QRT S.23.01.01, Appendix F.1.6.)

C.4.5 Stress and scenario testing and sensitivity analysis

Descriptions of the methods used, assumptions made and outcomes of stress and scenario testing and sensitivity analysis are provided in section C.7.1.

C.5. Operational Risk

C.5.1 Exposure

The Company's exposure to operational risk arises from the risk of direct or indirect loss, caused by inadequate or failed internal processes, people and systems, or external events including changes in the regulatory environment. The Company has a limited appetite for operational risk and aims to reduce these risks as far as commercially sensible.

Conduct risk, an element of operational risk, is where the Company does not achieve positive or fair customer outcomes. Management of conduct risk was a key priority for the Company across the whole lifecycle of its products and throughout the end to end journey of its customers in 2016 with robust governance and metrics embedded across the organisation.

The Company also seeks to manage its exposure to reputational risk, which is the risk of loss to the Company's franchise value from damage caused to the Company's brands or reputation. Examples of factors, regardless of whether authenticated or not, which could damage the Company's brands or reputation include litigation, employee misconduct, operational failures, the outcome of regulatory investigations, media speculation and negative publicity, disclosure of confidential client information or inadequate services.

As part of the wider Group strategy of digital customer interaction, its use of advanced data analytics and the increasing cyber security threat, together with regulators' attention to conduct issues, the Company has increased its inherent exposure to risks such as data theft, conduct breaches and customer service interruption arising from IT systems failure. The Company and its parent has sought to contain and reduce exposure to these risks during the year, for example by investment in a programme to improve information technology security, disaster recovery and outsourcing risk. The Company has also implemented the new Group Operational Risk and Control Management Framework, which better integrates the results of the risk identification and assurance activities carried out across the Company's three lines of defence.

Operational risks are initially identified and assessed against implemented controls. Residual risk, outside tolerance, is given prioritised management action to reduce it within tolerance. Operational risk is quantitatively assessed on the basis of financial loss and misstatement. Potential reputational and conduct impacts are qualitatively assessed.

The Company holds economic capital, based on the SII SCR, against residual operational risk, to the extent that it cannot be eliminated by management action. QRT S.25.02 (Appendix F.1.7) shows that the Company's undiversified SCR for operational risk is £2m. The Company also produces specific conduct risk management information used to measure and analyse its exposure to conduct risk.

There have been no material changes in the operational risks that the Company is exposed to over the year.

C.5.2 Risk Concentration

The majority of the Company's products are sold under the 'Barclays' brand, enabling leverage on the strength of that brand and supporting delivery of the Company's business strategy. Whilst reputational risk is mostly borne by the Barclays brand, the Company is vulnerable to any operational failures that adversely impact public perception of the 'Barclays' brand.

C.5.3 Risk mitigation

The Company has identified business critical functions and has exit and termination plans and business continuity and disaster recovery plans in the event of supplier failure. These plans are reviewed at least annually.

The Company's three lines of defence all monitor the effectiveness of the controls that are in place against operational risk. Further details of the three lines of defence are included in section B.1.1, including the specific roles and responsibilities of each line. Operational risk is overseen by the Operational Risk Committee, which is a senior management committee, and the Board.

C.5.4 Stress and scenario testing and sensitivity analysis

Descriptions of the methods used, assumptions made and outcomes of stress and scenario testing and sensitivity analysis is provided in section C.7.1

C.6 Other Material Risks

The Company has no material information to disclose regarding other material risks.

C.7 Any Other Information

C.7.1 Stress and scenario testing and sensitivity analysis

Stress and Scenario Testing (SST) in relation to the Company is an element of the wider Risk Management Framework, providing insight into key risk exposures and dependencies of the Company; considering resilience of potential changes to these exposures and dependencies; and anticipating a range of possible outcomes. The evaluation of the potential impacts on the Company's SII capital and liquidity positions enables the Company to identify and prepare for appropriate ways to mitigate and/or manage the realisation of such impacts.

The Company carries out a range of stress (where one risk factor, such as interest rates, is assumed to vary) and scenario (where combinations of risk factors are assumed to vary) tests to evaluate their impact on the business and to enable identification of plausible management actions to mitigate such impacts.

C.7.1.1 Stress and scenario testing

A range of stress and scenario tests are considered as part of the Company's Plan, with the results of these demonstrating that, after consideration of any management actions that may be required to restore surplus in extreme scenarios, the Company retains a SII surplus post a stress. The stress and scenario tests performed by the Company, have considered potential impacts including from the most significant risks to the Company of counterparty credit risk (arising from both the quota share arrangement in place with its parent company and the participation in the Group catastrophe reinsurance programme) and operational risks (arising from outsourcing operations and /or internal failings.) The Company also considers and is inherently considered within the SST that is completed by its parent company.

A range of assumptions are made in the development of stress and scenario tests and the measurement of resilience to such events. These assumptions are defined by suitable experts and, where applicable, by the PRA.

C.7.1.2 Sensitivity analysis

Management use the sensitivity analyses to assess the impact of a range of potential events of differing levels of severity on the capital and/or liquidity positions of the Company and to ensure that the Company has a sufficient range of plausible management actions that could be executed in a timely manner to mitigate the potential impacts.

The SCR is the primary basis used by the Company to measure and assess its risks. The sensitivity analysis performed by the Company therefore includes consideration of the sensitivity of its SCR cover ratio to a range of economic assumptions. For the Company, this includes consideration of impacts from changes in interest rates and changes in reinsurer ratings. The results of these analyses demonstrate, after consideration of any management actions that may be required to restore surplus in extreme scenarios, the Company retains a Solvency II surplus. This limited impact is primarily driven by the asset holdings which are predominately cash and UK gilts and the extensive reinsurance arrangements in place.

C.7.2 Prudent Person Principle

The Company ensures that its assets are invested in accordance with the prudent person principle as set out in Article 132 (Directive 2009/138/EC) through the collective application of its risk policies and business standards. These ensure that the Company invests in assets whose risks it can properly identify, measure, monitor, manage, control and report, and appropriately take into account in the assessment of its overall solvency needs having regard to the term and nature of its liabilities. Given the relatively small retained liabilities, the Company achieves this by investing in low-risk, short term gilts and cash.

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D. Valuation for Solvency Purposes

[In this chapter](#)

D.1 Assets

D.2 Technical Provisions

D.3 Other Liabilities

D.4 Alternative Methods of Valuation

D.5 Any Other Information

D. Valuation for Solvency Purposes

The 'Valuation for Solvency Purposes' section of the report provides a description of the bases, methods and main assumptions used in the valuation of assets, Technical Provisions and other liabilities for each material asset and liability class.

The Company's IFRS balance sheet is presented in column (b) of the following table, in accordance with the classification of assets and liabilities used in its financial statements. The references given in column (a) are to relevant accounting policies and notes provided in the financial statements.

A number of reclassifications, required to align the Company's IFRS balance sheet as shown in its financial statements, to the classifications required for the prescribed format of the SII balance sheet QRT, are given in column (c). The most significant reclassifications are:

- Under the SII requirements, cash flows relating to reinsurance premium are included within Reinsurance Recoverables, and cash flows relating to premium and policyholder tax are included within Technical Provisions. In the IFRS balance sheet these amounts are included within reinsurance payables, insurance and intermediaries receivables and other liabilities respectively;
- Amounts payable to Group companies under IFRS, are reclassified within the SII balance sheet to the relevant underlying nature of the balance; and
- Investments including cash equivalents are reclassified under SII.

The Company's assets and liabilities, as valued under IFRS and in line with SII requirements are shown in column (d). The Company's SII balance sheet is summarised in column (e) and detailed in the balance sheet QRT S.02.01 included in Appendix F.1.1. Differences between the valuation of the Company's assets and liabilities under SII and IFRS are presented in column (f).

Where the valuation of assets and liabilities is the same under IFRS and SII, a description of the bases, methods and main assumptions can be found in the accounting policies and notes of the Company's financial statements. If the valuation is materially different, a description of the bases methods and main assumptions used under SII is given in Sections D.1 and D.3.

Assets and other liabilities have been valued, according to the requirements of the SII regulations, at the amount for which they could be exchanged between knowledgeable willing parties in an arms length transaction. The value of other liabilities is not adjusted to take account of the impact of changes in own credit standing of the Company. The valuation of Technical Provisions is detailed in Section D.2.1.

The Company applied the following hierarchy of valuation approaches:

1. Quoted market prices in active markets for the same assets or liabilities;
2. Quoted market prices in active markets for similar assets and liabilities (with adjustments to reflect differences where necessary); and
3. Alternative methods of valuation.

The criteria to determine whether a market is active are consistent with IFRS 13: Fair Value Measurement. An "Active market" under IFRS is defined as a market in which transactions for the asset or liability take place with sufficient frequency and volume to provide pricing information on an ongoing basis. The assets, classified as Level 1 and Level 2 under IFRS 13: Fair Value Measurement, are deemed as market consistent under SII. The assets classified as Level 3, for which there is no active market, are considered to use alternative valuation methods under SII. The Company has not used any alternative methods of valuation.

Balance Sheet – IFRS and SII

As at 31 December 2016 £m	Note in financial statements	IFRS balance sheet classified according to financial statements	Reclassification of IFRS balances to SII balance sheet categories	Reclassified IFRS balance sheet	SII balance sheet	Valuation differences between SII and IFRS
	(a)	(b)	(c)	(d) =(b)+(c)	(e)	(f) =(e)-(d)
Deferred acquisition costs (DAC)	N & 11	23	-	23	-	(23)
Financial investments						
Bonds	K & 8	65	1	66	66	-
Collective investment undertakings			58	58	58	-
Reinsurance recoverables	I & 9	121	(89)	32	(4)	(36)
Receivables						
Insurance and intermediaries	L & 10	86	(86)	-	-	-
Reinsurance	L & 10	5	2	7	7	-
Cash and cash equivalents	O & 19	58	(58)	-	-	-
Prepayments and accrued income		6	(1)	5	5	-
Assets		364	(173)	191	132	(59)
Technical Provisions	H & 12	(121)	82	(39)	(3)	36
Payables and other financial liabilities						
Insurance and intermediaries payable	M & 14	(1)	(2)	(3)	(3)	-
Reinsurance payables	M & 14	(86)	86	-	-	-
Payables trade not insurance	M & 14	(13)	3	(10)	(10)	-
Amounts due to Group Companies	M & 14	(9)	9	-	-	-
Other liabilities						
Current tax liabilities	R & 13	(1)	1	-	-	-
Accruals	15	(32)	32	-	-	-
Reinsurers share of DAC	N & 15	(23)	-	(23)	-	23
Other liabilities		-	(38)	(38)	(36)	2
Liabilities		(286)	173	(113)	(52)	61
Excess of assets over liabilities		78	-	78	80	2

D.1 Assets

Assets have been valued according to the requirements of the SII Directive and related guidance; the basis of the SII valuation principle is the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction. A description of the basis of valuation under SII along with valuation differences between the SII bases and the IFRS financial statements, by asset class, is provided below; if the valuation method has been described in the financial statements it has not been included in this section.

D.1.1 Deferred acquisition costs

Deferred acquisition costs are recognised under IFRS reporting and deferred to the extent they are expected to be recoverable out of future margins in revenues on related contracts. Under SII these are not recognised and are therefore valued at £nil in the SII balance sheet. The associated cash flows are included in the valuation of SII Technical Provisions.

D.1.2 Collective investment undertakings

The Company's collective investment undertakings are all invested in highly liquid investments that are readily convertible into cash and which are subject to an insignificant risk of change in value.

D.1.3 Reinsurance recoverables

Reinsurance recoverables are calculated as the probability-weighted average of discounted future cash flows relating to reinsurance contracts, adjusted for the expected losses due to counterparty default. Although established separately, reinsurance recoverables are valued on the same basis and using the same methodology and assumptions used to derive Technical Provisions - Best Estimate Liabilities, as described in Section D.2.1, subject to the following:

- Internal expenses are only allowed if they are recoverable under the reinsurance agreement;
- Where the timing of recoveries diverges from that for payments a separate projection is used;
- Allowance for risk of default depends on the credit rating and exposure to the reinsurance counterparty; and
- Reinsurance assets take into account reinsurance commissions.

Reinsurance recoverables, consistent with the calculation of Technical Provisions - Best Estimate Liabilities, includes expected recoveries from pre-inception contracts where they occur within the premium or claims provisions.

Cash flows relating to future reinsurance arrangements comprise both expected recoveries and expected reinsurance premium payments. This means reinsurance contracts which are expected to be written are taken into account and thus assumptions in relation to the likely future reinsurance purchasing decisions are required.

The Company has a significant exposure to its parent company, AIL, arising from the quota share reinsurance agreement. Further details are set out in note 22 of the financial statements.

The material differences between the SII and IFRS valuation bases for reinsurance recoveries are as follows:

- Only reinsurance cash flows relating to long tailed (predominantly PPO) claims reserves are discounted under IFRS whereas all reinsurance cash flows are discounted under SII;
- The rate used to discount PPO cash flows is lower under SII than the equivalent rate used under IFRS;
- The unearned reinsurance premium reserve established under IFRS is replaced with a lower Best Estimate reinsurance premium provision, but the impact of this is offset by the release of deferred reinsurance commissions from other liabilities (see section D.3.2); and
- The SII valuation takes into account the additional reinsurance premium that is expected to be paid for reinsurance to cover business incepted at the valuation date. This is not accounted for under IFRS.

The Company does not have any Special Purpose Vehicles.

D.1.4 Prepayments

Prepayments are classified as Other Assets on the SII Balance Sheet. Prepayments are valued at their fair value, which is considered to be the same as their cost.

D.2 Technical Provisions

This section provides a definition of SII Technical Provisions, the methodology and main assumptions used in the valuation of the SII Technical Provisions, the total value of SII Technical Provisions split by material lines of business, a comparison of the valuation of SII Technical Provisions with IFRS Technical Provisions and a description of the level of uncertainty in Technical Provisions.

D.2.1 Valuation of Technical provisions

Technical Provisions which comprise Best Estimate Liabilities and a Risk Margin are summarised in the table given in section D.2.3. They are also detailed in the QRT S.17.01 (Non-life Technical Provisions) and S.12.01 (Life Technical Provisions), see Appendix F.1.3.

Whilst the Company only conducts non-life insurance activities, it also has life insurance obligations in the UK in relation to annuities stemming from non-life insurance contracts (PPO). PPO are classified as Technical Provisions - Life (excluding health and index-linked and unit-linked), within the prescribed format of the SII Balance Sheet.

Line of Business As at 31 December 2016 £m	Premium Provision	Claims Provision	Best Estimate	Risk Margin	Technical Provisions
Motor vehicle liability	-	1	1	-	1
Fire and property damage	(29)	20	(9)	1	(8)
General liability insurance	-	3	3	-	3
Non-life insurance obligations	(29)	24	(5)	1	(4)
PPOs other than health insurance	-	7	7	-	7
Life insurance obligations	-	7	7	-	7
Total	(29)	31	2	1	3

D.2.1.1 Non-life Best Estimate Liabilities

The following general principles apply to the valuation of Best Estimate Liabilities for all the Company's non-life business.

- A Best Estimate is one that represents the expected outcome from the range of possible outcomes for the future and is reasonable and realistic taking account of all the uncertainties involved.
- A consistent approach has been applied across all non-life business.
- The calculation of Technical Provisions is performed on a going concern basis. This means that it can be assumed that contracts run to their conclusion and as a result a proportion of expected future costs will be covered by future business.

The Company's Best Estimate Liabilities are valued based on the present value of future cash flows discounted using relevant risk-free interest rates. The cash flows that are considered when calculating the Best Estimate Liabilities derive from:

- In-force and expired contracts;
- Contracts that have not yet incepted but that the Company has an obligation to enter into at the valuation date (pre-inception contracts); and
- Future cancellations or endorsements by the policyholder.

Best Estimate Liabilities comprise a claims provision and a premium provision. The claims provision includes cash flows relating to events that occurred before the valuation date, whether reported or not. The cash flows include premiums, net claims costs and expenses. The premium provision includes cash flows relating to future claim events that have not yet occurred, but that are covered by existing contracts and legally binding pre-inception contracts. The cash flows include premiums, net claims and expenses, in respect of future claim events. Where future premium cash flows are expected to exceed projected future claim and expense cash flows, the premium provision is negative, as is the case for Fire and Other Damage to Property.

When modelling these cash flows the inflows are considered separately from the outflows. Claims costs take into account recoveries from salvage and subrogation. Expenses include administrative, investment management, loss adjustment and acquisition expenses including commissions and premium taxes.

Claims costs

The ultimate cost of outstanding claims is estimated using a range of standard actuarial claims projection techniques. The main assumption underlying these techniques is that the Company's past claims experience can be used as a basis to project future claims. Therefore these methods extrapolate the development of paid and incurred losses, average costs per claim and claim numbers based on the observed development of earlier years. The estimation of ultimate claims costs is done at the level of homogenous risk groups. These groups are mapped to SII lines of business.

Certain lines of business are also further analysed by claim type or type of coverage. For example, PPO claims require specialist actuarial techniques appropriate for the nature of the underlying liabilities.

Qualitative judgement is used to reflect changes in external factors such as public attitudes to claiming, economic conditions, levels of claims inflation, judicial decisions and legislation, as well as internal factors such as portfolio mix, policy conditions and claims handling procedures.

Premium provisions

Premium provisions are estimated by selecting an exposure measure and using that to establish the unearned and pre-inception exposure. Claims cost projections are set for each future period using trends in historic claims data adjusted for known anomalies in the data that are not expected to be repeated in the future, changes in mix and volume of business and to allow for the impact of projected claims inflation. These cost projections are then applied to the predicted exposure to determine the cash flows.

Expenses

Expenses are adjusted for expense and claims inflation and allocated between the claims and premium provisions. They are analysed by homogenous risk group or at a minimum by SII line of business. Future administrative costs and commission payments are projected using Best Estimate expense forecasts. Investment expenses are modelled as a percentage of Technical Provisions. Future unallocated loss adjustment expense provisions are set in relation to expected claims levels.

Events not In Data (ENID)

ENID are events not deemed to be captured by the data which need to be separately allowed for within the Best Estimate calculations to take appropriate account of uncertainty. Two types of ENID are considered: "known unknowns", which are possible future scenarios that can be anticipated and "unknown unknowns", which are future scenarios that are completely unexpected. No allowance is made for "unknown unknowns" as by definition, they cannot be known or quantified.

Allowances for "known unknowns" are made using scenario analysis to cover any foreseeable event with a potentially material impact. A core list of events is specified which is considered as the starting point for the analysis. ENID are considered both at SII lines of business level, and at portfolio level with allocations to SII lines of business, depending on the scenario being considered.

Discounting

All cash flows are discounted using the appropriate SII yield curve in the relevant currency. The yield curve is based on the risk free rate at the valuation date and is adjusted for the EIOPA prescribed credit risk adjustment and Volatility Adjustment. Payments are assumed to occur either mid-month or mid-year. Cash flows are modelled in monthly time intervals for the first 10 years and annually thereafter.

Future management actions

There are no future management actions assumed in the calculation of the Company's gross of reinsurance Best Estimate Liabilities as at 31 December 2016. Future management actions assumed in the calculation of reinsurance recoverables are detailed in section D.1.3.

D.2.1.2 PPO Best Estimate Liabilities

The Company's Best Estimate Liabilities for PPO, in common with non-Life business, are valued based on the present value of future cash flows discounted using relevant risk-free interest rates. The cash flows that are considered when calculating the Best Estimate Liabilities for PPO derive from:

- Payment of claims benefits: relating to the future care needs of the claimant; and
- Expenses: there are relatively small (compared to the size of claims benefits) administrative costs in relation to each PPO.

PPO Best Estimate liabilities use life insurance actuarial methods and techniques to estimate appropriate assumptions for each individual claimant.

Discounting

PPO cash flows are discounted using the appropriate SII yield curve adjusted for the EIOPA prescribed credit risk adjustment and Volatility Adjustment. The methods are consistent with those applied to non-life cash flows.

Longevity assumptions

Assumptions are made in relation to the future longevity of each PPO. These assumptions are based on the latest, general mortality assumptions for the population as a whole (including future expected changes in mortality), as well as any impairment to life expectancy on individual PPO based on independent medical opinions.

Inflation assumptions

PPO payments escalate based on indices specified at the time of settlement of the PPO. The majority of PPO claims escalate based on an Annual Survey of Hours and Earnings index (ASHE) with a smaller number escalating in line with the Retail Prices Index (RPI). The small number of PPO claims the Company has escalate at the ASHE index. Assumptions are therefore required for the future escalation of this index. The Company assumes that, over the longer term, the future escalation of the ASHE indices will be linked to RPI within the UK economy and uses market consistent views of future RPI inflation as the basis to project future ASHE inflation. Adjustments are then made to allow for expected differences between future ASHE inflation and future RPI inflation.

D.2.1.3 Risk Margin

The Risk Margin is an estimate of the amount, in addition to the Best Estimate Liability, that a third party would expect to receive in order to assume ownership of the Company's insurance obligations. The Risk Margin calculation takes material underwriting, non hedgeable market (except interest rate), credit and operational risk into account. Once calculated it is allocated to each SII line of business, although on materiality grounds some SII lines of business are allocated no Risk Margin.

D.2.1.4 Simplifications

In some areas of the calculation of the SII Best Estimate Liabilities, simplified methods have been used. The simplifications used have been assessed and have no material impact on the value of SII Best Estimate Liabilities. Where simplified methods are used, these are documented and justified in the Company's reserving reports and documentation. The main simplifications within the calculation of SII Best Estimate Liabilities are:

- The Company's Best Estimate Liabilities include a provision in relation to ENIDs. For the purposes of discounting cashflows, it is assumed that ENIDs have the same cashflow profile as other claims.
- Cashflows are modelled in monthly time intervals for the first 10 years and annually thereafter. For the purposes of discounting, all payments are assumed to occur mid-month or mid-year as dictated by the time intervals used.
- When calculating provisions for potential reinsurer default, reinsurance assets are grouped by reinsurer counterparty credit rating and within each credit rating the same probabilities of default are assumed.
- Gross premium debtors are split by class of business and payment date based on the split of written premium.
- The volume of Legally Obligated Unaccepted business has been estimated based on a proportion of January's planned written premium.

D.2.2 Level of uncertainty

The actual cost of settling insurance obligations may differ from the Best Estimate Liabilities because experience may be better or worse than assumed or future claims inflation may differ from that expected. There are a number of potential developments that would have a material adverse impact on the Best Estimate Liabilities value including:

- Catastrophic weather events;
- Unanticipated legislative changes; and
- Unanticipated inflation.

Specific areas of uncertainty are:

- Given the nature of the Company's business, on a gross of reinsurance basis the uncertainty around future weather claims experience is the largest risk the Company is exposed to. The Company has extensive reinsurance in place against these claims so net of reinsurance the level of uncertainty is reduced.
- PPO claims represent one of the most uncertain elements of the Company's Technical Provisions due to their long-tailed nature and the sensitivity to changes in economic-related assumptions. Additional uncertainty arises due to potential differences in the life expectancy of claimants compared to that assumed. Gross of reinsurance the level of uncertainty within the Technical Provisions for PPO is very high. The Company purchases reinsurance to mitigate longevity risk in relation to these claims, which materially reduces the level of uncertainty.

D.2.3 Material differences between the SII and IFRS valuation bases

The following table summarises gross of reinsurance SII Technical Provisions by material line of business and compares these to IFRS reclassified Technical Provisions. The information contained in this table is an extract from the SII Balance Sheet QRT s.02.01, presented in Appendix F.1.1

Technical Provisions as at 31 December 2016 (Asset)/Liability £m	Best estimate liability (BEL)	Risk margin (RM)	SII Technical Provisions (BEL+RM)	IFRS reclassified Technical Provisions	Difference between SII and IFRS reclassified Technical Provisions
Non-life (excluding health)	(5)	1	(4)	32	36
- Motor vehicle liability	1	0	1	1	0
- Fire and property damage	(9)	1	(8)	28	36
- General liability insurance	3	0	3	3	0
Life (excluding health and index-linked and unit-linked) (PPO)	7	-	7	7	-
Total	2	1	3	39	36

The material differences between the SII and IFRS valuation bases are:

- The unearned premium reserve established under IFRS is replaced with a Best Estimate premium provision which incorporates the expected cost of claims and expenses on the unearned periods of exposure. This leads to a lower premium provision under SII than the equivalent unearned premium reserves under IFRS and is the most material difference between SII and IFRS Technical Provisions in the table above. This difference has a material impact on the Fire and property damage line of business, but immaterial impacts on the other lines of business;
- Only PPO claims are discounted within IFRS provisions, whereas all cash flows are discounted under SII. This difference reduces SII Technical Provisions compared to IFRS provisions and affects all Non-life (excluding health) lines of business;
- SII Technical Provisions include the Risk Margin, which is not included within IFRS provisions, and which increases SII Technical Provisions compared to IFRS provisions. This mainly impacts on the Fire and property damage line of business;
- An explicit margin for uncertainty is included within IFRS provisions but removed under SII. This impacts all lines of business and reduces SII Technical Provisions compared to IFRS provisions;

- Under SII, provisions are established for Legally Obligated Unaccepted Business, whereas these provisions are not included within the IFRS valuation basis. This difference mainly impacts the Fire and property damage line of business. This decreases SII Technical Provisions compared to IFRS provisions.
- .

D.2.4 Volatility Adjustment

The Volatility Adjustment removes temporary distortions in spreads caused by illiquidity in the market or extreme widening of credit spreads, in particular in relation to government bonds. The PRA has approved the Company's application to apply a Volatility Adjustment. The impact of the Volatility Adjustment is detailed in the Long Term Guarantees and Transitional measures QRT S.22.01 (see Appendix F.1.5). The impact of removing the Volatility Adjustment from gross Technical Provisions would be to increase their value by £1m.

D.2.5 Other reliefs

No transitional provisions have been applied in the calculation of Technical Provisions.

D.3 Other Liabilities

Other liabilities have been valued according to the requirements of the SII Directive and related guidance; the basis of the SII valuation principle is the amount for which they could be exchanged between knowledgeable willing parties in an arm's length transaction. A description of the basis of valuation under SII along with valuation differences between the SII bases and the IFRS financial statements, by material class, is provided below; if the valuation method has been described in the financial statements it has not been included in this section.

The Company's financial statements provide information about contingent liabilities and other risk factors in note 18. The Company has no additional material contingent liabilities to recognise under SII.

D.3.1. Reinsurers share of deferred acquisition costs

Reinsurers' share of deferred acquisition costs of £23m, included within other liabilities under IFRS, are not recognised and therefore valued at £nil in the SII balance sheet.

D.3.2 Other liabilities

Other Liabilities comprise accruals and cash flows payable under the quota share arrangement. Other liabilities expected to be settled within one year are valued, on the SII balance sheet, at the amount expected to be paid. Non-current accruals and other liabilities are valued at their fair value, and are not adjusted to take account of the impact of changes in the own credit standing of the Company. In valuing such liabilities, the timing and monetary amount of expected outflow of cash or other resources are determined and these projected cash flows discounted.

Deferred income of £2m, included within other liabilities under IFRS, is not recognised and therefore valued at £nil in the SII balance sheet.

D.4 Alternative Methods of Valuation

The Company's has not used any alternative methods of valuation.

D.5 Any Other Information

The Company has no other material information to disclose.

Gresham Insurance Company Limited

Solvency and Financial Condition Report

2016

E. Capital Management

[In this chapter](#)

- E.1 Own Funds
- E.2 Solvency Capital Requirement and Minimum Capital Requirement
- E.3 Use of Duration-Based Equity Risk Sub-Module in the Calculation of the Solvency Capital Requirement
- E.4 Difference between the Standard Formula and any Internal Model Used
- E.5 Non-Compliance with the Minimum Capital Requirement and Non-Compliance with the Solvency Capital Requirement
- E.6 Any Other Information

E. Capital Management

This section of the report describes the internal operational structures and procedures underlying the Company's capital management process covering structure and quality of Own Funds; SCR and MCR; methodology for calculation of the SCR; differences between internal model (IM) and SF and any other material information.

E.1 Own Funds

E.1.1 Management of Own Funds

The Company's policy on capital and risk management is set out in its Risk Management Framework. The Company's capital and risk management objectives are closely interlinked and support earnings growth and dividend policy, whilst also recognising the critical importance of protecting policyholder and other stakeholder interests. The Company's primary objective of managing capital efficiently is to optimise the balance between return and risk, whilst maintaining economic and regulatory capital surplus in accordance with approved risk appetites.

In managing its Own Funds the Company also seeks to:

- Match the profile of its assets and liabilities, taking account of the risks inherent in the business;
- Maintain sufficient, but not excessive, financial strength to support new business growth and satisfy the requirements of its policyholders and its regulator, the PRA;
- Retain financial flexibility by maintaining sufficient liquidity; and
- Allocate capital efficiently, applying it to support value adding growth and repatriating excess capital to its shareholder through dividends.

Own Funds are monitored via forecasts over a three year planning horizon. A number of tests are used to enable the Company to understand the volatility of its earnings and capital requirement, and therefore manage its capital more efficiently.

There have been no material changes to the objectives, policies or processes during the year.

E.1.2 Eligible Own Funds

An analysis of the Company's Own Funds by tier is presented in the Own Funds QRT S.23.01, (see Appendix F.1.6), and summarised below.

As at 31 December 2016	Total £m	Tier 1 (unrestricted) £m
Ordinary share capital	61	61
Reconciliation reserve	19	19
Total Basic Own Funds	80	80

Tiering analysis

The Company's ordinary share capital and reconciliation reserve are available to absorb losses and have the Tier 1 features of permanence and subordination. As the Company's Articles of Association do not contain any restriction on the right of the Company to cancel dividends or other distributions at any time before they are paid, the Company's ordinary share capital is classified as unrestricted Tier 1.

Reconciliation reserve

The Company's capital comprises ordinary share capital and retained earnings. However, retained earnings are not separately disclosed in Own Funds. They are notionally included in the reconciliation reserve, which reconciles the total excess of assets over liabilities with identifiable capital instruments included in Own Funds.

The table below sets out the constituent parts of the reconciliation reserve as at 31 December 2016:

As at 31 December 2016	£m
SII excess of assets over liabilities	80
Ordinary share capital	(61)
Reconciliation reserve	19

Eligibility of tiered Capital

The eligibility of tiered Capital, to cover the SCR and MCR depends upon the tiering shown above and a number of quantitative limits. The Company's Own Funds satisfy all limits applicable to the SCR and MCR and therefore the eligibility of the Company's capital to cover the SCR and MCR is unrestricted, as shown in the table below.

As at 31 December 2016	£m
Total eligible Own Funds to meet the SCR	80
Total eligible Own Funds to meet the MCR	80

The ratio of eligible Own Funds to the SCR and the MCR is detailed below.

As at 31 December 2016	
Ratio of eligible Own Funds to the SCR	1,175%
Ratio of eligible Own Funds to the MCR	2,390%

E.1.3 Material differences between equity on an IFRS basis and Own Funds

At 31 December 2016 the Company's Own Funds are equal to its excess of assets over liabilities on a SII basis. The excess of £80m is £2m more than the Company's total equity on an IFRS basis. The following table details the material differences between the excess of assets over liabilities on a SII basis and total equity on an IFRS basis.

As at 31 December 2016	£m	£m	See Section
Total equity on an IFRS basis		78	
Elimination of deferred acquisition costs	(23)		D.1.1
Valuation adjustments to reinsurance recoverables	(36)		D.1.3
Valuation adjustments to Technical Provisions	36		D.2.3
Reinsurers share of deferred acquisition costs	23		D.3.1
Other valuation adjustments	2		
		2	
Excess of assets over liabilities on a SII basis		80	

E.1.4 Transitional arrangements and restrictions

The Company's Own Funds are unrestricted and fully transferable.

E.2 Solvency Capital Requirement (SCR) and Minimum Capital Requirement (MCR)

E.2.1 The amount of the SCR and MCR

The Company's SCR as at 31 December 2016 was £7m. This is shown in the SCR QRT, S.25.01, see Appendix F.1.7.

The Company's MCR as at 31 December 2016 was £3m. This is shown on the MCR QRT, S.28.01, see Appendix F.1.8.

The final amount of the SCR is subject to supervisory assessment and does not include any regulator-imposed capital add-ons.

E.2.2 The composition of the SCR

The Company determines its SCR using SF. An analysis by risk module is presented in the table below. Further detail is shown in the SCR QRT, see Appendix F.1.7.

Diversified SCR by risk component (per the SCR QRT) As at 31 December 2016	£m
Market risk	1
Counterparty default risk	5
Diversification between risk categories	(1)
Basic SCR	5
Operational risk	2
Total SCR	7

Each risk module includes the impact of diversification within that module. The diversification benefit of £1m therefore only includes the benefit of diversification between risk modules.

E.2.3 Simplifications, undertaking specific parameters and matching adjustment

The Company has not used any simplified calculations, undertaking specific parameters or a matching adjustment in the calculation of its SCR.

E.2.4 MCR Calculation

The Company's MCR is calculated by applying prescribed factors to its net written premium and its Best Estimate Liabilities. The MCR is subject to two further constraints; it must lie in the range of 25 to 45% of the Company's SCR and it cannot be less than an absolute minimum of €3.7m, converted at the exchange rate applicable at the end of October preceding the year end. The Company's MCR is the absolute minimum which is £3m following conversion into GBP.

E.3 Use of the Duration-based Equity Risk Sub-Module in the Calculation of the Solvency Capital Requirement

The Company does not use this option.

E.4 Difference between the Standard Formula and any Internal Model Used

The Company does not use an IM.

E.5 Non-Compliance with the Minimum Capital Requirement and Non-Compliance with the Solvency Capital Requirement

The Company has complied continuously with both the MCR and the SCR throughout the reporting period.

E.6 Any other Information

The Company has no other material information to disclose.

Appendix F.1.1

S.02.01.02

Balance Sheet

Amounts in 000s

		Solvency II Value
		C0010
Assets		
Intangible assets	R0030	
Deferred tax assets	R0040	
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	123,794
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	
Equities	R0100	
- Equities - Listed	R0110	
- Equities - Unlisted	R0120	
Bonds	R0130	65,594
- Government Bonds	R0140	65,594
- Corporate Bonds	R0150	
- Structured Notes	R0160	
- Collateralised securities	R0170	
Collective Investments Undertakings	R0180	58,200
Derivatives	R0190	
Deposits other than cash equivalents	R0200	
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	
Loans & mortgages	R0230	
- Loans on policies	R0240	
- Loans & mortgages to individuals	R0250	
- Other loans & mortgages	R0260	
Reinsurance recoverables from:	R0270	-3,932
- Reinsurance recoverables - Non-life and health similar to non-life	R0280	-10,604
- Reinsurance recoverables - Non-life excluding health	R0290	-10,604
- Reinsurance recoverables - Health similar to non-life	R0300	
- Reinsurance recoverables - Life and health similar to life, excluding health and index-linked and unit-linked	R0310	6,672
- Reinsurance recoverables - Health similar to life	R0320	
- Reinsurance recoverables - Life excluding health and index-linked and unit-linked	R0330	6,672
- Reinsurance recoverables - Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance & intermediaries receivables	R0360	0
Reinsurance receivables	R0370	7,148
Receivables (trade, not insurance)	R0380	-492
Own Shares (held directly)	R0390	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	
Cash and cash equivalents	R0410	18
Any other assets, not elsewhere shown	R0420	5,221
Total assets	R0500	131,757
Liabilities		
Technical provisions - Non-life	R0510	-4,384
- Technical provisions - Non-life (excluding health)	R0520	-4,384
- TP calculated as a whole - Non-life (excluding health)	R0530	
- Best Estimate - Non-life (excluding health)	R0540	-4,758
- Risk margin - Non-life (excluding health)	R0550	374
- Technical provisions - Health (similar to non-life)	R0560	
- TP calculated as a whole - Health (similar to non-life)	R0570	
- Best Estimate - Health (similar to non-life)	R0580	
- Risk margin - Health (similar to non-life)	R0590	
Technical provisions - Life (excluding index-linked and unit linked)	R0600	7,064
- Technical provisions - Health (similar to life)	R0610	
- TP calculated as a whole - Health (similar to life)	R0620	
- Best Estimate - Health (similar to life)	R0630	
- Risk margin - Health (similar to life)	R0640	
- Technical provisions - Life (excluding health and index-linked and unit-linked)	R0650	7,064
- TP calculated as a whole - Life (excl health, index-linked and unit-linked)	R0660	
- Best Estimate - Life (excl health, index-linked and unit-linked)	R0670	7,064
- Risk margin - Life (excl health, index-linked and unit-linked)	R0680	
Technical provisions - Index-linked and unit-linked	R0690	
- TP calculated as a whole - Index-linked and unit-linked	R0700	
- Best Estimate - Index-linked and unit-linked	R0710	
- Risk margin - Index-linked and unit-linked	R0720	
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	
Pension benefit obligations	R0760	
Deposits from reinsurers	R0770	
Deferred tax liabilities	R0780	377
Derivatives	R0790	
Debts owed to credit institutions	R0800	473
Financial liabilities other than debts owed to credit institutions	R0810	
Insurance & intermediaries payables	R0820	3,111
Reinsurance payables	R0830	113
Payables (trade, not insurance)	R0840	9,734
Subordinated liabilities	R0850	
- Subordinated liabilities not in BOF	R0860	
- Subordinated liabilities in BOF	R0870	
Any other liabilities, not elsewhere shown	R0880	35,644
Total liabilities	R0900	52,133
Excess of assets over liabilities	R1000	79,624

Appendix F.1.2.1

S.05.01.02

Premiums, claims and expenses by line of business

Amounts in 000s

		Line of Business for: life insurance obligations						Life reinsurance obligations		Total
		Health insurance (direct business)	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance (reinsurance accepted)	Life reinsurance	
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
Premiums written										
Gross - Direct Business	R1410									
Reinsurers' share	R1420									
Net	R1500									
Premiums earned										
Gross - Direct Business	R1510									
Reinsurers' share	R1520									
Net	R1600									
Claims incurred										
Gross - Direct Business	R1610						1,956			1,956
Reinsurers' share	R1620						1,091			1,091
Net	R1700						865			865
Changes in other technical provisions										
Gross - Direct Business	R1710									
Reinsurers' share	R1720									
Net	R1800									
Expenses incurred		R1900								
Other expenses		R2500								
Total expenses		R2600								

Appendix F.1.2.2

S.05.01.02

Premiums, claims and expenses by line of business

Amounts in 000s

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)											
Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120
Premiums written											
Gross - Direct Business	R0110					159,024	4,918				
Gross - Proportional reinsurance accepted	R0120										
Gross - Non-proportional reinsurance accepted	R0130										
Reinsurers' share	R0140					151,699	4,692				
Net	R0200					7,325	227				
Premiums earned											
Gross - Direct Business	R0210					166,507	5,150				
Gross - Proportional reinsurance accepted	R0220										
Gross - Non-proportional reinsurance accepted	R0230										
Reinsurers' share	R0240		16			159,166	4,923				
Net	R0300		-16			7,341	227				
Claims incurred											
Gross - Direct Business	R0310		-156			51,251	1,585				
Gross - Proportional reinsurance accepted	R0320										
Gross - Non-proportional reinsurance accepted	R0330										
Reinsurers' share	R0340		-718			52,442	1,622				
Net	R0400		562			-1,191	-37				
Changes in other technical provisions											
Gross - Direct Business	R0410										
Gross - Proportional reinsurance accepted	R0420										
Gross - Non-proportional reinsurance accepted	R0430										
Reinsurers' share	R0440										
Net	R0500										
Expenses incurred	R0550		9			6,429	199				
Other expenses	R1200										
Total expenses	R1300										

Line of Business for: accepted non proportional reinsurance					
	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	Total
	C0130	C0140	C0150	C0160	C0200
Premiums written					
Gross - Direct Business	R0110				163,942
Gross - Proportional reinsurance accepted	R0120				
Gross - Non-proportional reinsurance accepted	R0130				
Reinsurers' share	R0140				156,391
Net	R0200				7,552
Premiums earned					
Gross - Direct Business	R0210				171,657
Gross - Proportional reinsurance accepted	R0220				
Gross - Non-proportional reinsurance accepted	R0230				
Reinsurers' share	R0240				164,105
Net	R0300				7,552
Claims incurred					
Gross - Direct Business	R0310				52,681
Gross - Proportional reinsurance accepted	R0320				
Gross - Non-proportional reinsurance accepted	R0330				
Reinsurers' share	R0340				53,346
Net	R0400				-666
Changes in other technical provisions					
Gross - Direct Business	R0410				
Gross - Proportional reinsurance accepted	R0420				
Gross - Non-proportional reinsurance accepted	R0430				
Reinsurers' share	R0440				
Net	R0500				
Expenses incurred	R0550				6,637
Other expenses	R1200				-4,017
Total expenses	R1300				2,620

Appendix F.1.2.3

S.05.02.01

Premiums, claims and expenses by Country

Amounts in 000s

		Home Country	Top 5 countries (by amount of gross premium written) - life obligations					Total Top 5 and home country
		C0150	C0160	C0170	C0180	C0190	C0200	C0210
	R1400							
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
Premiums written								
Gross	R1410							0
Reinsurers' share	R1420							0
Net	R1500							0
Premiums earned								
Gross	R1510							0
Reinsurers' share	R1520							0
Net	R1600							0
Claims incurred								
Gross	R1610	1,956						1,956
Reinsurers' share	R1620	1,091						1,091
Net	R1700	865						865
Changes in other technical provisions								
Gross	R1710							0
Reinsurers' share	R1720							0
Net	R1800							0
Expenses incurred	R1900							0
Other expenses	R2500							0
Total expenses	R2600							0

S.05.02.01

Amounts in 000s

Amounts in 000s

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Technical provisions calculated as a whole

Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole

Technical provisions calculated as a sum of BE and RM**Best Estimate****Gross Best Estimate**

Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default

Best estimate minus recoverables from reinsurance and SPV - Total

Risk Margin**Amount of the transitional on Technical Provisions**

Technical Provisions calculated as a whole

Best estimate

Risk margin

Technical provisions - Total

	Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance	Accepted Reinsurance	Total (Life other than health insurance, incl. Unit
			Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees			
	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150
R0010										
R0020										
R0030								7,064		7,064
R0080								6,672		6,672
R0090								392		392
R0100										
R0110										
R0120										
R0130										
R0200								7,064		7,064

Technical provisions calculated as a whole

Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole

Technical provisions calculated as a sum of BE and RM**Best Estimate****Gross Best Estimate**

Total Recoverables from reinsurance and SPV after the adjustment for expected losses due to counterparty default

Best estimate minus recoverables from reinsurance and SPV - Total

Risk Margin**Amount of the transitional on Technical Provisions**

Technical Provisions calculated as a whole

Best estimate

Risk margin

Technical provisions - Total

	Health Insurance (direct business)		Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)	
	Contracts without options and guarantees	Contracts with options or guarantees				
	C0160	C0170	C0180	C0190	C0200	C0210
R0010						
R0020						
R0030						
R0080						
R0090						
R0100						
R0110						
R0120						
R0130						
R0200						

Appendix F.1.3.2
S.17.01.02
Non-life Technical Provisions
Amounts in 000s

Technical provisions calculated as a whole

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole

Technical provisions calculated as a sum of BE and RM

Best estimate

Premium provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Premium Provisions

Claims provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Claims Provisions

Total Best estimate - Gross

Total Best estimate - Net

Risk margin

Amount of the transitional on Technical Provisions

Technical Provisions calculated as a whole

Best estimate

Risk margin

Technical provisions - Total

Technical provisions - Total

Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - Total

Technical provisions minus recoverables from reinsurance/SPV and Finite Re - Total

	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Direct business Other motor insurance	and accepted Marine, aviation and transport insurance	proportional Fire and other damage to property insurance	reinsurance General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss
	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130
R0010												
R0050												
R0060							-28,837	121				
R0140							-34,446	121				
R0150							5,608					
R0160				1,676			19,479	2,803				
R0240				1,676			19,268	2,776				
R0250							210	28				
R0260				1,676			-9,359	2,924				
R0270							5,818	28				
R0280				-59			536	-102				
R0290												
R0300												
R0310												
R0320				1,617			-8,823	2,822				
R0330				1,676			-15,177	2,897				
R0340				-59			6,354	-75				

Technical provisions calculated as a whole

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole

Technical provisions calculated as a sum of BE and RM

Best estimate

Premium provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Premium Provisions

Claims provisions

Gross

Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default

Net Best Estimate of Claims Provisions

Total Best estimate - Gross

Total Best estimate - Net

Risk margin

Amount of the transitional on Technical Provisions

Technical Provisions calculated as a whole

Best estimate

Risk margin

Technical provisions - Total

Technical provisions - Total

Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - Total

Technical provisions minus recoverables from reinsurance/SPV and Finite Re - Total

	Accepted Non-proportional health reinsurance	non-proportional Non-proportional casualty reinsurance	reinsurance Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	Total Non-Life obligation
	C0140	C0150	C0160	C0170	C0180
R0010					
R0050					
R0060					-28,717
R0140					-34,325
R0150					5,608
R0160					23,959
R0240					23,721
R0250					238
R0260					-4,758
R0270					5,846
R0280					374
R0290					
R0300					
R0310					
R0320					-4,384
R0330					-10,604
R0340					6,221

Total Non-Life Business

Accident year / Underwriting year	Z0010	AY
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Gross Claims Paid (non-cumulative)
(absolute amount)

		Development Year											In Current year	Sum of years (cumulative)
		0	1	2	3	4	5	6	7	8	9	10&+	C0170	C0180
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		
Prior	R0100											18	R0100	18
N-9	R0160	139,148	83,479	11,877	4,737	3,036	1,727	4,097	2,661	527	88		R0160	441,309
N-8	R0170	99,335	53,405	6,140	2,724	1,901	931	404	-302	262			R0170	251,378
N-7	R0180	90,397	43,313	5,528	3,056	1,710	885	480	188				R0180	164,799
N-6	R0190	70,649	62,603	7,116	1,975	1,415	1,422	112					R0190	145,556
N-5	R0200	58,405	25,154	3,069	1,543	998	603						R0200	89,773
N-4	R0210	63,786	29,236	2,995	1,352	681							R0210	98,050
N-3	R0220	48,480	30,044	3,595	1,207								R0220	83,326
N-2	R0230	50,779	21,227	2,160									R0230	74,166
N-1	R0240	39,115	20,306										R0240	59,421
N	R0250	37,651											R0250	37,651
													Total	1,590,722

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

		Development Year											Year end (discounted data)
		0	1	2	3	4	5	6	7	8	9	10&+	
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	
Prior	R0100											156	R0100
N-9	R0160										570		R0160
N-8	R0170									356			R0170
N-7	R0180								1,917				R0180
N-6	R0190							270					R0190
N-5	R0200						838						R0200
N-4	R0210					1,091							R0210
N-3	R0220				710								R0220
N-2	R0230			1,730									R0230
N-1	R0240		3,680										R0240
N	R0250	12,953											R0250
													Total

Appendix F.1.5

S.22.01.21

Impact of long term guarantees and transitional measures

Amounts in 000s

		Amount with LG measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical Provisions	R0010	2,681			886	
Basic Own Funds	R0020	79,624				
Eligible own funds to meet Solvency Capital Requirement	R0050	79,624				
Solvency Capital Requirement	R0090	6,777				
Eligible own funds to meet Minimum Capital Requirement	R0100	79,624				
Minimum Capital Requirement	R0110	3,332				

Appendix F.1.6

S.23.01.01

Own Funds

Amounts in 000s

	Total	Tier 1 Unrestricted	Tier 1 Restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35					
Ordinary share capital (gross of own shares)	R0010	61,400	61,400		
Share premium account related to ordinary share capital	R0030				
Total initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual type undertakings	R0040				
Subordinated mutual member accounts	R0050				
Surplus funds	R0070				
Preference shares	R0090				
Share premium account related to preference shares	R0110				
Reconciliation reserve	R0130	18,224	18,224		
Subordinated liabilities	R0140				
An amount equal to the value of net deferred tax assets	R0160				
Own fund from financial statements do not meet the criteria to be classified as Solvency II own funds	R0180				
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				
Deductions					
Deductions for participations in financial and credit institutions	R0230				
Total basic own funds after deductions	R0290	79,624	79,624		
Ancillary own funds					
Unpaid and uncalled ordinary share capital callable on demand	R0300				
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310				
Unpaid and uncalled preference shares callable on demand	R0320				
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330				
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340				
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350				
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360				
Supplementary members calls - Other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370				
Other ancillary own funds	R0390				
Total ancillary own funds	R0400				
Available and eligible own funds					
Total available own funds to meet the SCR	R0500	79,624	79,624		
Total available own funds to meet the MCR	R0510	79,624	79,624		
Total eligible own funds to meet the SCR	R0540	79,624	79,624		
Total eligible own funds to meet the MCR	R0550	79,624	79,624		
SCR	R0580	6,777			
MCR	R0600	3,332			
Ratio of Eligible own funds to SCR	R0620	11.7490			
Ratio of Eligible own funds to MCR	R0640	23.8978			
	C0060				
Reconciliation Reserve					
Excess of assets over liabilities	R0700	79,624			
Own shares (direct/indirect)	R0710				
Foreseeable dividends, distributions and charges	R0720				
Other basic own fund items	R0730	61,400			
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740				
Reconciliation reserve	R0760	18,224			
Expected profits					
Expected profits included in future premiums (EPIFP) - Life business	R0770				
Expected profits included in future premiums (EPIFP) - Non-life business	R0780				
Total Expected profits included in future premiums (EPIFP)	R0790				

Appendix F.1.7

S.25.01.21

Solvency Capital Requirement - For undertakings on Standard Formula

Amounts in 000s

	Gross solvency capital requirement	USP	Simplifications
	C0110	C0090	C0100
Market risk	R0010 782		
Counterparty default risk	R0020 4,906		
Life underwriting risk	R0030 77		
Health underwriting risk	R0040		
Non-life underwriting risk	R0050 66		
Diversification	R0060 -618		
Intangible asset risk	R0070		
Basic Solvency Capital Requirement	R0100 5,213		
Calculation of Solvency capital Requirement			
Operational risk	R0130 1,564		
Loss-absorbing capacity of technical provisions	R0140		
Loss-absorbing capacity of deferred taxes	R0150		
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160		
Solvency Capital Requirement excluding capital add-on	R0200 6,777		
Capital add-ons already set	R0210		
Solvency capital requirement for undertakings under consolidated method	R0220 6,777		
Other information on SCR			
Capital requirement for duration-based equity risk sub-module	R0400		
Total amount of Notional Solvency Capital Requirements for remaining part	R0410		
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420		
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430		
Diversification effects due to RFF nSCR aggregation for article 304	R0440		

Appendix F.1.8

S.28.01.01

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

Amounts in 000s

Linear formula component for non-life insurance and reinsurance obligations

		C0010	
MCRNL Result	R0010	1,129	

Linear formula component for life insurance and reinsurance obligations

		C0040	
MCRL Result	R0200	8	

Overall MCR calculation

		C0070	
Linear MCR	R0300	1,137	
SCR	R0310	6,777	
MCR cap	R0320	3,050	
MCR floor	R0330	1,694	
Combined MCR	R0340	1,694	
Absolute floor of the MCR	R0350	3,332	
		C0070	
Minimum Capital Requirement	R0400	3,332	

F.2 Glossary of Abbreviations and Definitions

99.5% percentile	An event that would be expected to occur once in every 200 years
AIL	Aviva Insurance Ltd
ALCO	Asset and liability committee
Alternative valuation methods	Valuation methods that are consistent with Article 75 of the SII Directive other than those which solely use the quoted market prices for the same or similar assets or liabilities ⁱⁱ
Basis risk	The risk resulting from the situation in which the exposure covered by the risk-mitigation technique does not correspond to the risk exposure of the insurance or reinsurance undertaking ⁱⁱ
CEO	Chief Executive Officer
CFO	Chief Finance Officer
Collateral arrangements	Arrangements under which collateral providers do one of the following: (a) transfer full ownership of the collateral to the collateral taker for the purposes of securing or otherwise covering the performance of a relevant obligation; (b) provide collateral by way of security in favour of, or to, a collateral taker, and the legal ownership of the collateral remains with the collateral provider or a custodian when the security right is established ⁱⁱ
Concentration risk	All risk exposures with a loss potential which is large enough to threaten the solvency or the financial position of insurance and reinsurance undertakings ⁱ
Credit risk	The risk of loss or of adverse change in the financial situation, resulting from fluctuations in the credit standing of issuers of securities, counterparties and any debtors to which insurance and reinsurance undertakings are exposed, in the form of counterparty default risk, or spread risk, or market risk concentrations ⁱ
CRO	Chief Risk Officer
Diversification effects	The reduction in the risk exposure of insurance and reinsurance undertakings and groups related to the diversification of their business, resulting from the fact that the adverse outcome from one risk can be offset by a more favourable outcome from another risk, where those risks are not fully correlated ⁱ
EEA	European Economic Area
EIOPA	European Insurance and Occupational Pensions Authority
ENID	Events Not in Data are events not deemed to be captured by the data which need to be separately allowed for within the best estimate calculations to take appropriate account of uncertainty.
Expected profit included in future premium	The expected present value of future cash flows which result from the inclusion in technical provisions of premiums relating to existing insurance and reinsurance contracts that are expected to be received in the future, but that may not be received for any reason, other than because the insured event has occurred, regardless of the legal or contractual rights of the policyholder to discontinue the policy ⁱⁱ
FCA	Financial Conduct Authority
GAAP	Generally accepted accounting principles
GBP	British pound sterling
The Group	Aviva plc and its subsidiary companies
IFRS	International Financial Reporting Standards (used to prepare the Company's financial statements)
IMMMR	Identify, Measure, Manage, Monitor and Report risks
Liquidity risk	The risk that insurance and reinsurance undertakings are unable to realise investments and other assets in order to settle their financial obligations when they fall due ⁱ
Longevity risk	The risk associated with annuitants living longer than expected.
Market risk	The risk of loss or of adverse change in the financial situation resulting, directly or indirectly, from fluctuations in the level and in the volatility of market prices of assets, liabilities and financial instruments ⁱ
MCR	Minimum Capital Requirement
Operational risk	The risk of loss arising from inadequate or failed internal processes, personnel or systems, or from external events ⁱ
ORSA	Own Risk and Solvency Assessment
Outsourcing	An arrangement of any form between an insurance or reinsurance undertaking and a service provider, whether a supervised entity or not, by which that service provider performs a process, a service or an activity, whether

	directly or by sub-outsourcing, which would otherwise be performed by the insurance or reinsurance undertaking itself ^f
PPO	Periodic Payment Orders (annuities stemming from non-life insurance contract)
PRA	Prudential Regulatory Authority
Qualifying holding	A direct or indirect holding in an undertaking which represents 10 % or more of the capital or of the voting rights or which makes it possible to exercise a significant influence over the management of that undertaking ⁱⁱ
QRT	Quantitative Reporting Templates
RCSA	Risk and control self assessment
Risk Margin	An estimate of the amount, in addition to the Best Estimate Liability that a third party would expect to receive in order to assume ownership of the Company's insurance obligations.
Risk-mitigation techniques	All techniques which enable insurance and reinsurance undertakings to transfer part or all of their risks to another party ⁱ
SCR	Solvency Capital Requirement
Scenario analysis	The analysis of the impact of a combination of adverse events ⁱⁱ
SF	Standard Formula
SII	Solvency II Regulatory Regime
SII Directive	Directive 2009/138/EC of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance
SII Regulations	Commission delegated regulation (EU) 2015/35 of 10 October 2014 supplementing Directive 2009/138/EC of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II)
Special Purpose Vehicle	Any undertaking, whether incorporated or not, other than an existing insurance or reinsurance undertaking, which assumes risks from insurance or reinsurance undertakings and which fully funds its exposure to such risks through the proceeds of a debt issuance or any other financing mechanism where the repayment rights of the providers of such debt or financing mechanism are subordinated to the reinsurance obligations of such an undertaking ⁱ
SST	Stress and Scenario Testing
Subrogation	Subrogation is the right for an insurer to legally pursue a third party that caused an insurance loss to the insured. This is done as a means of recovering the amount of the claim paid by the insurance carrier to the insured for the loss.
Underwriting risk	The risk of loss or of adverse change in the value of insurance liabilities, due to inadequate pricing and provisioning assumptions ⁱ

ⁱ Article 13 SII Directive

ⁱⁱ Article 1 SII Regulations

F.3 Directors' Statement

We acknowledge our responsibility for preparing the Solvency and Financial Condition Report of Gresham Insurance Company Limited at 31 December 2016 in all material respects in accordance with the PRA Rules and the Solvency II Regulations.

The Board is satisfied that to the best of its knowledge and belief:

(a) throughout the financial year to 31 December 2016, the Company has complied in all material respects with the requirements of the PRA rules and Solvency II Regulations as applicable to the Company; and

(b) it is reasonable to believe that in respect of the period from 31 December 2016 to the date of the publication of the SFCR, the Company has continued so to comply and that it will continue so to comply for the remainder of the financial year to 31 December 2017.

R Barker
Director
16 May 2017

Report of the external independent auditors to the Directors of Gresham Insurance Company Limited ('the Company') pursuant to Rule 4.1 (2) of the External Audit Part of the PRA Rulebook applicable to Solvency II firms

Report on the Audit of the relevant elements of the Solvency and Financial Condition Report

Opinion

We have audited the following documents prepared by the Company as at 31 December 2016:

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Solvency and Financial Condition Report of the Company as at 31 December 2016, (**'the Narrative Disclosures subject to audit'**); and
- Company templates S.02.01.02, S.12.01.02, S.17.01.02, S.22.01.21, S.23.01.01, S.25.01.21 and S.28.01.01 (**'the Templates subject to audit'**).

The Narrative Disclosures subject to audit and the Templates subject to audit are collectively referred to as the **'relevant elements of the Solvency and Financial Condition Report'**.

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

- The 'Summary', 'Business and performance', 'System of governance' and 'Risk profile' elements of the Solvency and Financial Condition Report;
- Company templates S.05.01.02, S.05.02.01 and S.19.01.21;
- The written acknowledgement by management of their responsibilities, including for the preparation of the Solvency and Financial Condition Report (**'the Responsibility Statement'**).

In our opinion, the information subject to audit in the relevant elements of the Solvency and Financial Condition Report of the Company as at 31 December 2016 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, and as supplemented by supervisory approvals.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK and Ireland) (ISAs (UK & I)), International Standard on Auditing (UK) 800 and International Standard on Auditing (UK) 805, and applicable law. Our responsibilities under those standards are further described in the *Auditors' Responsibilities for the Audit of the relevant elements of the Solvency and Financial Condition Report* section of our report.

Emphasis of Matter - Basis of Accounting

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

Responsibilities of Directors for the Solvency and Financial Condition Report

The Directors are responsible for the preparation of the Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations which have been supplemented by the approval made by the PRA, under the PRA Rules and Solvency II regulations on which they are based, as detailed below:

- Approval to use the volatility adjustment in the calculation of technical provisions

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

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

It is our responsibility to form an independent opinion, in accordance with applicable law, ISAs (UK & I) and ISAs (UK) 800 and 805 as to whether the information subject to audit in the relevant elements of the Solvency and Financial Condition Report is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based. ISAs (UK & I) require us to comply with the Auditing Practices Board's Ethical Standard for Auditors.

An audit involves obtaining evidence about the amounts and disclosures in the relevant elements of the Solvency and Financial Condition Report sufficient to give reasonable assurance that the relevant elements of the Solvency and Financial Condition Report are free from material misstatement, whether caused by fraud or error. This includes an assessment of: whether the accounting policies are appropriate to the Company's circumstances and have been consistently applied and adequately disclosed; the reasonableness of significant accounting estimates made by the Directors; and the overall presentation of the relevant elements of the Solvency and Financial Condition Report. In addition, we read all the financial and non-financial information in the Solvency and Financial Condition Report to identify material inconsistencies with the audited relevant elements of the Solvency and Financial Condition Report. If we become aware of any apparent material misstatements or inconsistencies we consider the implications for our report.

This report, including the opinion, has been prepared for the Directors of the Company to comply with their obligations under External Audit rule 2.1 of the Solvency II firms Sector of the PRA Rulebook and for no other purpose. We do not, in providing this report, accept or assume responsibility for any other purpose save where expressly agreed by our prior consent in writing.

Report on Other Legal and Regulatory Requirements

In accordance with Rule 4.1 (3) of the External Audit Part of the PRA Rulebook for Solvency II firms we are required to read the Other Information and consider whether it is materially inconsistent with the relevant elements of the Solvency and Financial Condition Report and our knowledge obtained in the audits of the Solvency and Financial Condition Report and of the Company's statutory financial statements. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

PricewaterhouseCoopers LLP
Chartered Accountants
London
16 May 2017

- The maintenance and integrity of the Aviva plc website is the responsibility of the directors; the work carried out by the auditors does not involve consideration of these matters and, accordingly, the auditors accept no responsibility for any changes that may have occurred to the Solvency and Financial Condition Report since it was initially presented on the website.
- Legislation in the United Kingdom governing the preparation and dissemination of Solvency and Financial Condition Reports may differ from legislation in other jurisdictions.