

# SOLVENCY AND FINANCIAL CONDITION REPORT

BRITISH GAS INSURANCE LIMITED

Year Ended 31 December 2018

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## SUMMARY

(Unaudited)

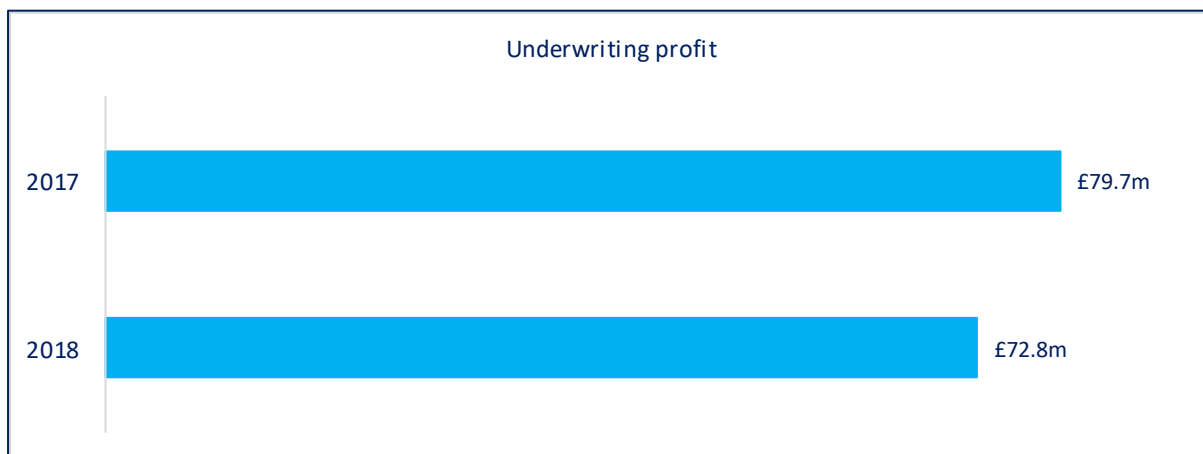
British Gas Insurance Limited underwrites general insurance risks in the UK, within the assistance<sup>1</sup> class of business. The HomeCare range covers the breakdown of domestic boilers and central heating systems, as well as options to cover plumbing & drains and home electrics. We also offer appliance cover.

We are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

All business is introduced to British Gas Insurance Limited by British Gas Services Limited, an insurance intermediary directly authorised and regulated by the Financial Conduct Authority and part of the Centrica Group.

## BUSINESS AND PERFORMANCE

There has been a reduction in customer numbers over the year, reflecting a competitive marketplace. This reduction, along with periods of colder weather when there is increased demand on central heating systems and more boiler breakdowns, has contributed to lower underwriting profit in 2018.



Section A has more information on our business and performance.

## SYSTEM OF GOVERNANCE

Governance is provided through the Board, its sub-committees and Executive committees.

We have a robust risk management system in place to identify, measure, monitor, manage and report on the risks to our business strategy and delivery of our objectives. We operate a 'three lines of defence' governance model to ensure appropriate segregation of risk ownership, oversight and assurance responsibilities.

- First line: business management is accountable for implementing and using the risk management framework.
- Second line: Risk and Compliance functions are accountable for providing an independent and forward-looking view of the risk profile to the Board, as well as providing the necessary oversight and challenge to the first line.
- Third line: Internal Audit is accountable for providing independent assurance on the adequacy and effectiveness of risk management and control.

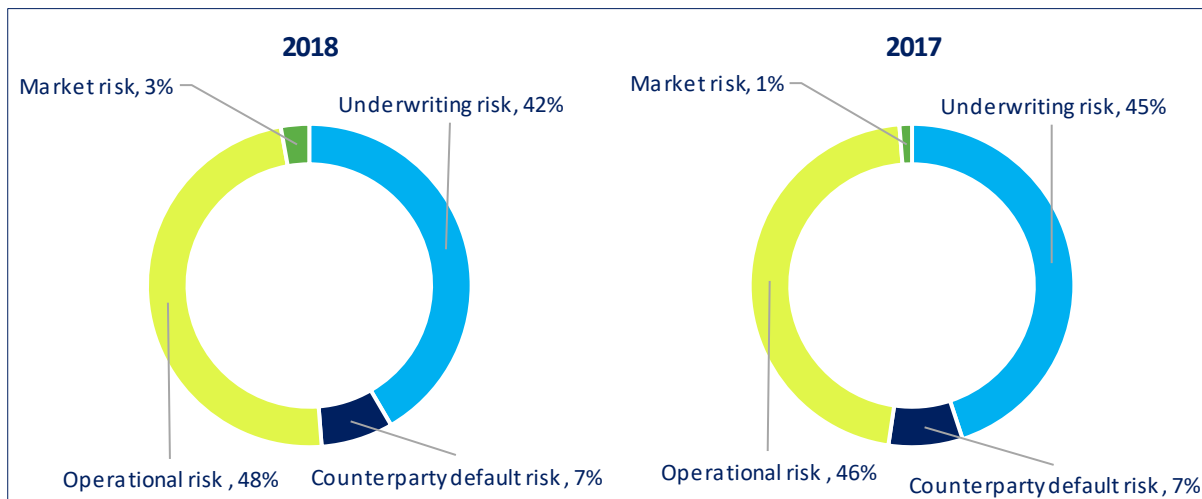
Section B has more information on our system of governance.

<sup>1</sup> Customers can also arrange home insurance through British Gas but we do not underwrite it and so this report does not cover home insurance.

**RISK PROFILE**

Our risk profile is very similar to last year. Underwriting risk and operational risk remain key risks. Cold weather risk is our biggest underwriting risk and how British Gas Services Limited deal with customers drives our operational risk.

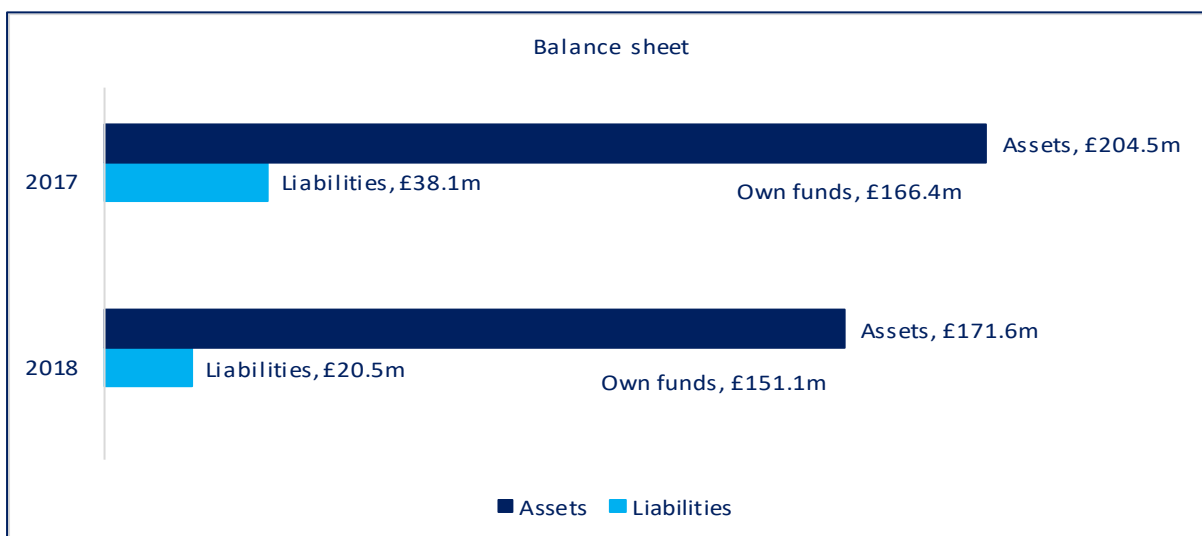
Compared to many other insurers, our operational risks represent a bigger proportion of our total risk profile. This is a feature of our comparatively low underwriting risk due to the quick settlement of claims at a unit cost per claim.



The risks associated with Brexit continue to be monitored. As a UK-only insurer, we are not affected by passporting arrangements, or exposed to currency risk, but we are exposed to general UK economic conditions. In addition, the ability of British Gas Services Limited to deliver services is potentially impacted, although contingency measures are in place.

**VALUATION FOR SOLVENCY PURPOSES**

Our own funds (excess of assets over liabilities) have decreased but that is mostly due to a decrease in assets as a result of higher dividends being paid in 2018.



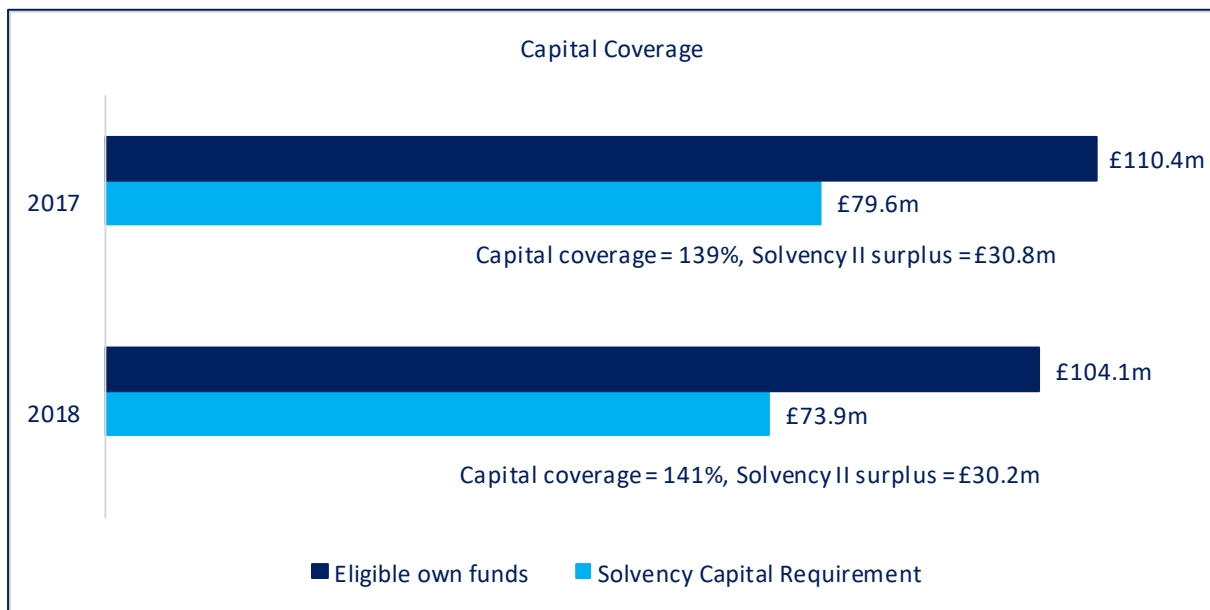
Further information on assets and liabilities is provided in section D.

**CAPITAL MANAGEMENT**

In 2018 the Prudential Regulation Authority approved the use of our own model to calculate operational risk and counterparty default risk, in addition to underwriting risk. Last year we calculated operational risk and counterparty default risk using a formulaic approach<sup>2</sup> but this did not adequately reflect our risk profile. Using our own model has decreased the amount of capital we are required to hold.

Our aim is to maintain sufficient capital to meet claims as they fall due, protect the interests of customers and meet operating needs and regulatory requirements. We hold enough funds to cover our capital requirement plus a margin. Our policy is to pay excess funds as a dividend (subject to ongoing business performance being within risk appetite, and any other relevant factors) so our capital coverage is similar to last year.

We pay dividends to our parent company, GB Gas Holdings. We paid a 2017 dividend of £56m in May 2018. We also paid a dividend of £20m in December 2018 and we expect to pay a further dividend for 2018 of £47m in May 2019, reducing our own funds to £104.1m which is £30.2m above our Solvency Capital Requirement (SCR).



The minimum amount of capital that we must hold (our MCR) is £33.3m.

We have maintained sufficient own funds to meet both our SCR and our MCR throughout the reporting period.

Section E contains further information on capital management.

<sup>2</sup> Solvency II Standard Formula plus a PRA-approved capital add-on. Further detail is in section E.

## MEANING OF TERMS

Capital coverage	<p>Insurers are required to hold enough eligible own funds to cover the SCR.</p> <p>The capital coverage ratio, defined as eligible own funds divided by the SCR, must be at least 100%.</p>
Counterparty default risk (credit risk)	<p>Credit risk is defined as the risk of loss resulting from fluctuations in the credit standing of issuers of securities, counterparties and any debtors to which British Gas Insurance is exposed.</p>
Market risk	<p>Market risk is the risk of loss resulting from fluctuations in the level and volatility of market prices of assets and liabilities.</p>
Operational risk	<p>Operational risk is the risk of loss, or other adverse consequences, resulting from inadequate or failed internal processes, people, systems or external events.</p>
Own funds (Eligible own funds)	<p>Own funds represent the excess of assets over liabilities.</p> <p>Eligible own funds are own funds after approved dividends have been deducted.</p>
Parent company	<p>The parent company of British Gas Insurance Limited is GB Gas Holdings Limited, part of the Centrica Group.</p>
Solvency II	<p>Solvency II is a EU-wide regulatory regime.</p>
Solvency Capital Requirement (SCR)	<p>The SCR represents the level of eligible own funds required to provide assurance that the Company can absorb significant losses in remote (1 in 200) scenarios, and still meet policyholders' claims costs and other obligations as they fall due.</p>
Underwriting risk	<p>Underwriting risk refers to fluctuations in the timing, frequency and severity of insured events relative to the expectations of the insurer at the time of underwriting.</p>

There is also a glossary of terms at the end of the report.

## **DIRECTORS' REPORT**

(Unaudited)

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

We are satisfied that:

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

For and on behalf of the Board of British Gas Insurance Limited:



Stephen O'Dwyer

Finance Director

9 April 2019

**REPORT OF THE EXTERNAL INDEPENDENT AUDITOR TO THE DIRECTORS OF BRITISH GAS INSURANCE LIMITED ('THE COMPANY') PURSUANT TO RULE 4.1 (2) OF THE EXTERNAL AUDIT CHAPTER OF THE PRA RULEBOOK APPLICABLE TO SOLVENCY II FIRMS**

**Report on the Audit of the relevant elements of the Solvency and Financial Condition Report ("SFCR")**

**Opinion**

Except as stated below, we have audited the following documents prepared by the Company as at 31 December 2018:

- the 'Valuation for solvency purposes' and 'Capital Management' sections of the SFCR of the Company as at 31 December 2018, ('the Narrative Disclosures subject to audit'); and
- Company templates S.02.01.02, S.17.01.02, S.23.01.01, 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 SFCR'.

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

- information contained within the relevant elements of the SFCR set out about above which are, or derive from the Solvency Capital Requirement, as identified in the Appendix to this report;
- the 'Executive summary', 'Business and performance', 'System of governance' and 'Risk profile' elements of the SFCR;
- Company templates S.05.01.02, S.05.02.01, S.19.01.21, S.25.02.21, S.25.03.21;
- the written acknowledgement by management of their responsibilities, including for the preparation of the SFCR ('the Responsibility Statement').

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

In our opinion, the information subject to audit in the relevant elements of the SFCR of the Company as at 31 December 2018 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals and determinations.

**Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)), including ISA (UK) 800 and ISA (UK) 805, and applicable law. Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the relevant elements of the Solvency and Financial Condition Report* section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the SFCR in the UK, including the Financial Reporting Council's (the 'FRC's') Ethical Standards as applied to public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

**Emphasis of Matter – Basis of Accounting**

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



### **Conclusions relating to going concern**

We are required by ISAs (UK) to report in respect of the following matters where:

- the Directors' use of the going concern basis of accounting in the preparation of the SFCR is not appropriate; or
- the Directors have not disclosed in the SFCR any identified material uncertainties that may cast significant doubt about the Company's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from the date when the SFCR is authorised for issue.

We have nothing to report in relation to these matters.

### **Other Information**

The Directors are responsible for the Other Information.

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

In connection with our audit of the SFCR, our responsibility is to read the Other Information and, in doing so, consider whether the Other Information is materially inconsistent with the relevant elements of the SFCR, or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the relevant elements of the SFCR or a material misstatement of the Other Information. If, based on the work we have performed, we conclude that there is a material misstatement of this Other Information, we are required to report that fact.

We have nothing to report in relation to these matters.

### **Responsibilities of Directors for the Solvency and Financial Condition Report**

The Directors are responsible for the preparation of the SFCR in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations which have been modified by the modifications, and supplemented by the approvals and determinations made by the PRA under section 138A of FSMA, the PRA Rules and Solvency II regulations on which they are based.

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

### **Auditor's Responsibilities for the Audit of the relevant elements of the Solvency and Financial Condition Report**

It is our responsibility to form an independent opinion as to whether the relevant elements of the SFCR are prepared, in all material respects, with financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

Our objectives are to obtain reasonable assurance about whether the relevant elements of the SFCR are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decision making or the judgement of the users taken on the basis of the SFCR.

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

### **Other Matter**

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

### **Report on Other Legal and Regulatory Requirements.**

In accordance with Rule 4.1 (3) of the External Audit Chapter of the PRA Rulebook for Solvency II firms we are also required to consider whether the Other Information is materially inconsistent with our knowledge obtained in the audit of British Gas Insurance Limited's statutory financial statements. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in relation to this matter.

### **Use of our Report**

This report is made solely to the Directors of British Gas Insurance Limited in accordance with Rule 4.1 (2) of the External Audit Chapter of the PRA Rulebook for Solvency II firms. We acknowledge that our report will be provided to the PRA for the use of the PRA solely for the purposes set down by statute and the PRA's rules. Our audit work has been undertaken so that we might state to the insurer's Directors those matters we are required to state to them in an auditor's report on the relevant elements of the SFCR and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the PRA, for our audit work, for this report or for the opinions we have formed.



Adam Addis, ACA (Senior Statutory Auditor)  
Deloitte LLP  
1 New Street Square  
London  
EC4A 3HQ

9 April 2019

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

### **Solo partial internal model**

:

- The following elements of template S.02.01.02:
  - Row R0550: Technical provisions – non-life (excluding health) – risk margin
  - Row R0590: Technical provisions – health (similar to non-life) – risk margin
  - Row R0640: Technical provisions – health (similar to life) – risk margin
  - Row R0680: Technical provisions – life (excluding health and index-linked and unit-linked) risk margin
  - Row R0720: Technical provisions – Index-linked and unit-linked – risk margin
  
- *The following elements of template S.17.01.02*
  - *Row R0280: Technical provisions calculated as a sum of BE and RM – Risk margin*
  - *Rows R0290 to R0310 – Amount of transitional measure on technical provisions*
  
- The following elements of template S.23.01.01
  - Row R0580: SCR
  - Row R0740: Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds
  
- The following elements of template S.28.01.01
  - Row R0310: SCR
  
- Elements of the Narrative Disclosures subject to audit identified as 'unaudited'.

## INTRODUCTION

The requirement to produce an annual Solvency and Financial Condition Report follows the introduction of the Solvency II regime on 1 January 2016 for the EU insurance industry. This includes standards for assessing capital requirements and governance over risk management, with the principal objectives of improved comparability of information across the insurance industry and increased policyholder protection. The summary is intended for policyholders with the remaining sections aimed at analysts.

This report for British Gas Insurance Limited (“BGIL” or “the Company”) presents information on business and performance, the system of governance, risk profile, valuation of assets and liabilities, and capital management.

Information about the business and performance of the Company is also included in BGIL’s Annual Report and Financial Statements for 2018.

Parts of the SFCR are subject to external audit, as indicated, and explained in the Independent Auditor’s report.

Figures are presented on a Solvency II basis, unless indicated otherwise.

## A BUSINESS AND PERFORMANCE

(Unaudited)

### A.1 BUSINESS

#### A.1.1 COMPANY INFORMATION

British Gas Insurance Limited is incorporated in the United Kingdom and registered in England and Wales under the company registration number 06608316. It is authorised by the Prudential Regulation Authority, and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under Financial Services Register number 490565.

Its registered office and details of its supervisors and auditor are as follows:

#### Registered Office

British Gas Insurance Limited  
Millstream, Maidenhead Road  
Windsor  
Berkshire  
SL4 5GD  
+44 (0) 1753 494000

#### External Auditor

Deloitte LLP  
Hill House  
1 New Street Square  
London  
EC4A 3HQ  
+44 (0) 20 7936 3000

#### Supervisory Authority

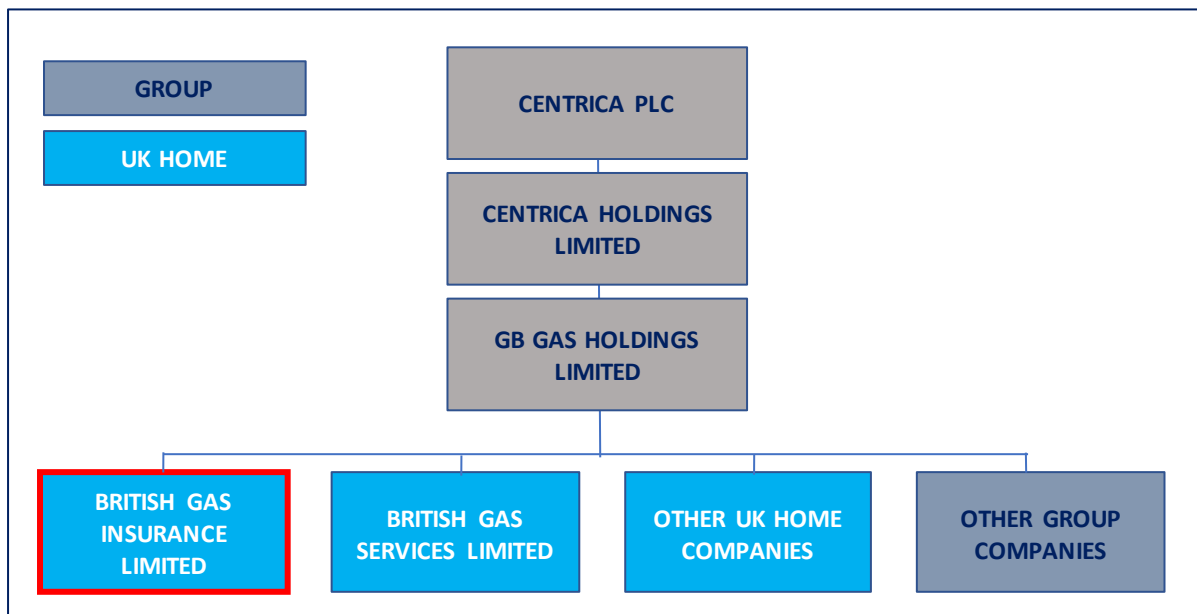
Prudential Regulatory Authority  
20 Moorgate  
London  
EC2R 6DA  
+44 (0) 20 7601 4444

#### Supervisory Authority

Financial Conduct Authority  
12 Endeavour Square  
London  
E20 1JN  
+44 (0) 20 7066 1000

### A.1.2 GROUP STRUCTURE

BGIL is a private company limited by shares and is a wholly owned subsidiary of GB Gas Holdings Limited within the Centrica Group.



All business is introduced to BGIL by BGSL, an insurance intermediary directly authorised and regulated by the FCA and part of the Centrica Group.

Further information about the activities outsourced to BGSL are included in section B.7.

### A.1.3 LINES OF BUSINESS

BGIL underwrites general insurance risks in the UK, within the assistance class of business, covering the breakdown of domestic boilers and central heating systems, plumbing & drains, and electrical and gas appliances. The Company does not write risks outside the UK.

## A.2 UNDERWRITING PERFORMANCE

Underwriting performance at 31 December	2018 £m	2017 £m
Gross written premium	1,033.8	1,012.1
Gross earned premium	1,023.2	1,030.6
Claims incurred	(470.2)	(462.4)
Expenses incurred	(477.0)	(473.6)
Other expenses	(3.1)	(15.0)
<b>Underwriting profit</b>	<b>72.8</b>	<b>79.7</b>
<b>Combined operating ratio (COR)</b>	<b>92.9%</b>	<b>92.3%</b>

There has been a reduction in policies in force over the year to 7.7m (2017: 7.9m) due to a decrease in customer numbers to 3.1m (2017: 3.2m) reflecting a competitive marketplace.

Underwriting performance in both 2017 and 2018 was within risk appetite tolerances, with periods of colder weather and reduced exposure contributing to a lower underwriting profit in 2018.

### A.3 INVESTMENT PERFORMANCE

#### A.3.1 INVESTMENTS BY ASSET CLASS

Investments held by BGIL are shown below. BGIL invests in short duration, high-quality fixed interest securities and deposit-based investments.

Investments at 31 December	2018 £m	2017 £m
Collective investment undertakings	129.7	198.7
Cash deposits	40.3	5.0
<b>Total investments</b>	<b>170.0</b>	<b>203.7</b>

The decrease in investments over the year is primarily due to higher dividends being paid in 2018. Further information is in section A.4.

#### A.3.2 INVESTMENT INCOME AND EXPENSES

Investment income at 31 December	2018 £m	2017 £m
Investment income	1.3	0.7
Investment expenses	(0.2)	(0.2)
<b>Net investment income</b>	<b>1.1</b>	<b>0.5</b>

All investment income and expenses relate to unit holdings in short-term money market funds and deposits with financial institutions. Expenses represent fees paid to investment managers.

### A.4 PERFORMANCE OF OTHER ACTIVITIES

BGIL paid a 2017 dividend to its parent company, GBGH, of £56m in May 2018 and a 2018 interim dividend of £20m in December 2018. The Board have approved a dividend of £47m to be paid to GBGH in May 2019.

Further information is in section E.1.

### A.5 ANY OTHER INFORMATION

BGIL does not invest in equity or have any investments in securitisation.

There is no other information to report.

## B SYSTEM OF GOVERNANCE

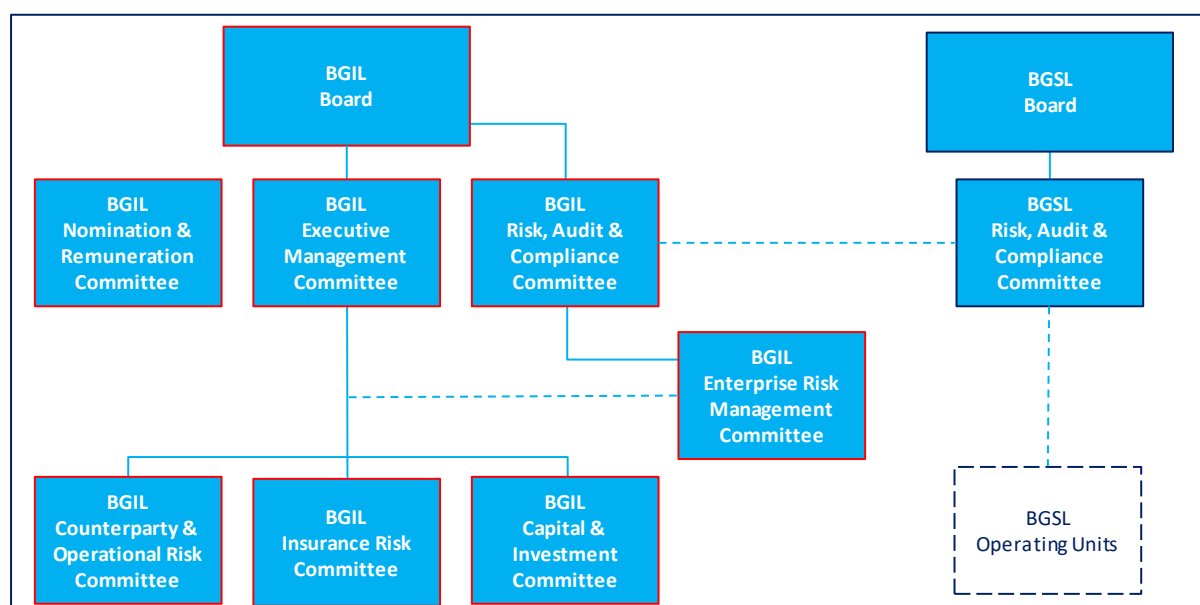
(Unaudited)

Information in this section relates to the system of governance for the year ending 31 December 2018. A new governance structure has been adopted with effect from 1 January 2019. Further details are provided in section B.8.3.

### B.1 GENERAL INFORMATION ON THE SYSTEM OF GOVERNANCE

#### B.1.1 GOVERNANCE STRUCTURE

BGIL's governance structure for the year ending 31 December 2018 is shown below. Elements of BGSL's governance structure are also shown since BGIL's relationship with BGSL informs BGIL's operational and counterparty default risks. Further details are provided in sections C and E.



#### B.1.2 ROLES AND RESPONSIBILITIES

##### Board

The Board has overall responsibility for the oversight of the management of BGIL. Its objectives include setting the strategic aims, monitoring management's performance against those aims, setting risk appetite and ensuring that effective controls are in place. Any major changes to the Company's business activities must be approved by the Board before implementation. The Board meets at least quarterly. Minutes of all Board meetings are recorded and reflect the substance of the discussion as well as the decisions made.

The Board comprises an independent non-executive chairman, non-executive directors and executive directors.

##### Board Sub-Committees

All authority flows from the Board but it delegates to sub-committees. Responsibilities are set out in the respective terms of reference.

The following sub-committees were in place over the reporting period:

- The Nomination & Remuneration Committee: responsible for the nomination and approval of senior management appointments and for the effective operation of the remuneration policy.
- The Executive Management Committee: the main operational committee of the Board, responsible for implementing the business strategy and decisions of the Board.

- The Risk, Audit & Compliance Committee: responsible for the Company's risk, compliance, actuarial and internal audit functions as well as internal controls and financial matters. Joint meetings were held with the equivalent BGSL committee twice a year.

### Executive Committees

The Board sub-committees were supported by the following Executive committees over the reporting period:

- Enterprise Risk Management Committee: a sub-committee of the Risk, Audit & Compliance Committee with second line responsibility for providing challenge to the Executive's risk management and control activity, including the oversight of the development and operation of BGIL's partial internal model.
- Counterparty & Operational Risk Committee: responsible for managing the counterparty and operational risk framework.
- Insurance Risk Committee: responsible for managing the insurance risk framework.
- Capital & Investment Committee: responsible for capital management and market risk.

### Key Functions

BGIL has the following Solvency II key functions:

- Risk Function (section B.3).
- Compliance Function (section B.4).
- Internal Audit (section B.5).
- Actuarial Function (section B.6).

#### B.1.3 MATERIAL CHANGES TO THE SYSTEM OF GOVERNANCE OVER THE REPORTING PERIOD

There were no material changes to the system of governance over the reporting period.

In preparation for the new governance structure effective from 1 January 2019 (section B.8.3) some directors resigned over the year and new directors have been appointed:

- Christopher Stern (independent non-executive chairman) resigned on 30 September 2018.
- Robin Phipps (independent non-executive chairman) was appointed on 5 December 2018.
- Edward Dutton (executive) resigned from the Board on 31 December 2018.
- David Young (independent non-executive) resigned on 31 December 2018. He held the post of interim chairman between 30 September 2018 and 5 December 2018.

In addition, David Hindley (independent non-executive) was appointed on 1 January 2018.

Information about appointments after the reporting period is included in section B.8.3.

#### B.1.4 REMUNERATION POLICY

BGIL employees are employed under Centrica (or other Group company) contracts but BGIL has its own remuneration policy which is aligned to the Centrica plc reward framework and remuneration principles. It applies to BGIL's management and key employees whose professional activities have a material impact on BGIL's risk profile.

The key goal of the reward philosophy is to attract and retain top talent and motivate high performance while rewarding the right skills, behaviours and outcomes necessary to meet the long-term business strategy and ensure fair treatment of customers. Remuneration is managed and structured in line with PRA regulations with the fixed component of an individual's remuneration representing an appropriate proportion of total remuneration so that bonus payments do not skew decision making towards short term benefits.

The BGIL remuneration policy includes the following components:

- Base salary.
- Incentive plan: designed to reward the delivery of key strategic priorities for the year. The amount awarded each year depends on the financial performance of Centrica plc over the year and is also



measured against individual objectives that align with Centrica's and BGIL's business strategies. The target and maximum incentive payment is typically defined as a percentage of base salary. The award may be delivered entirely in cash, or as a combination of cash and deferred shares, depending on seniority and performance rating. Claw-back and malus provisions apply to deferred shares.

- Pension: new hires are offered membership of the Centrica defined contribution arrangement with a defined benefit arrangement in place for employees who joined prior to 2009. BGIL has no pension scheme of its own. BGIL has no material pension liabilities in respect of the defined benefit scheme.
- Benefits: Centrica offers other benefits including car allowance, life assurance and flexible benefits.
- Share plans: All UK-based employees are entitled to participate in HMRC-approved share plans.

#### **B.1.5 MATERIAL TRANSACTIONS**

No material transactions have been identified during the reporting period with shareholders, with persons who exercise a significant influence on the undertaking, or with members of the administrative, management or supervisory body.

### **B.2 FIT AND PROPER REQUIREMENTS**

BGIL implements policies and procedures to ensure persons who effectively run the Company, or have responsibility for key functions, are fit and proper to do so.

Individuals holding Senior Manager Functions are required to receive prior approval from the PRA and/or FCA before they can perform their role. Appointments are subject to background and good repute checks.

An individual's fitness to perform their role refers to their competence and capability including skills, knowledge and expertise. Assessments of fitness are tailored to the role, including knowledge and understanding of:

- The markets in which they operate (i.e. insurance or financial services).
- Business strategy and business model.
- System of governance.
- Financial and, where relevant, actuarial analysis.
- Regulatory framework and requirements.

### **B.3 RISK MANAGEMENT SYSTEM INCLUDING THE OWN RISK AND SOLVENCY ASSESSMENT**

#### **B.3.1 CHIEF RISK OFFICER**

The Risk Management Function is led by the Chief Risk Officer whose role includes:

- Contributing to the strategy and management of the company via membership of the BGIL Executive committees.
- Responsibility for the overall management of the risk management system and the Risk and Compliance functions.
- Ensuring BGIL activities comply with current legislation and regulations, including through second line opinion.
- Coordinating the ORSA processes and report.
- Promoting good and active working relationships with the PRA.

#### **B.3.2 RISK MANAGEMENT FRAMEWORK**

BGIL's risk management system starts with its Enterprise Risk Management Framework, the primary objective of which is to ensure that processes are in place for effective planning, organising, leading and controlling of BGIL activities to manage the effect of risk on BGIL's capital and earnings, while ensuring good customer outcomes and employee safety.

Governance is achieved through the implementation of a 'three lines of defence' model that ensures appropriate segregation of risk ownership, oversight and assurance responsibilities.

- First line: business management is accountable for implementing and using the risk management framework.
- Second line: Risk and Compliance functions are accountable for providing an independent and forward-looking view of the risk profile to the Board, as well as providing the necessary oversight and challenge to the first line.
- Third line: Internal Audit is accountable for providing independent assurance on the adequacy and effectiveness of risk management and control.

### **B.3.3 RISK MANAGEMENT SYSTEM**

#### **Risk Policies**

To support its objectives, BGIL's risk management framework includes a comprehensive set of risk policies which cover the partial internal model as well as all material risk categories to which BGIL is exposed. They are approved annually by the Board and/or appropriate sub-committees.

#### **Risk Appetite Statements**

Risk appetite is the amount of risk which the Board is willing to take to meet its strategic objectives.

Risk appetite statements are reviewed annually and approved by the Board.

The Risk Function is responsible for monitoring and reporting against the risk appetite statements. If a risk appetite threshold has been (or is close to being) breached, action is taken to bring the exposure level back within the accepted range. Out of appetite statements are reported to the Board and relevant sub-committees.

### **B.3.4 RISK PROCESSES**

BGIL's risk management system includes the five processes below:

#### **Identification**

BGIL identifies current, emerging and future risks through various means such as meetings, workshops and seminars.

Once a new or emerging risk has been identified a risk owner is assigned and the risk is added to the risk register.

#### **Measurement**

BGIL measures risk using a risk matrix approach as well as scenario analysis.

#### **Management**

A comprehensive controls framework exists which ensures risk is managed within agreed appetite and tolerance levels.

#### **Monitoring**

Monitoring to ensure that risks are accurately evaluated and adequately controlled is integral to the risk management processes. Monitoring is achieved through the BGIL controls framework, stress and scenario testing, risk and control owner reviews, second line monitoring by the Risk and Compliance functions, and third line of defence reviews.

#### **Reporting**

Risk reporting and communication forms a vital part of the process to ensure visibility and transparency of risks at both a BGIL and a Group level. Various risk reports are produced including risk dashboards and the ORSA report.

### **B.3.5 RISK MODELLING**

BGIL has a partial internal model which it uses to calculate its SCR and economic capital requirement. Further details are provided in section E.2.

Oversight of the partial internal model is provided in the first instance by the Counterparty & Operational Risk Committee, and the Insurance Risk Committee.

The Executive committees are responsible for ensuring the model is performing as intended and reflects the risk profile of the business.

Oversight is also provided by Board sub-committees, which are responsible for the ongoing appropriateness of the design and operation of the model, as well as for reviewing all model changes and validation reports. Independent validation of the modelling underlying the SCR is undertaken by an external firm on behalf of the Risk Function.

The Board is required to approve BGIL's SCR, appropriate summaries of internal model results and validation reports on an annual basis.

### **B.3.6 OWN RISK AND SOLVENCY ASSESSMENT ("ORSA")**

The ORSA enables senior management to make business decisions relating to medium term capital management and business planning.

The ORSA process is cyclical and incorporates several underlying business processes. The full cycle is performed at least annually, or more frequently if required in response to material changes in the internal or external environment.

The ORSA:

- Is forward looking and considers risks, solvency and capital management over a three-year horizon.
- Considers all the key risks that face the business, including those not in the SCR such as liquidity and strategic risks.
- Considers the link between the resulting risk profile, the approved risk appetite and the economic and regulatory capital requirements.
- Includes stress and scenario testing and reverse stress testing.

The Board own the ORSA process with the CRO being responsible for coordinating the underlying ORSA processes and for producing an ORSA report. The underlying processes are undertaken throughout the year and reports for each key process are produced for the Board and reviewed by Executive committees. The ORSA report, which contains the key results and conclusions of the underlying processes, is reviewed by the Board and appropriate sub-committees, and approved by the Board.

## **B.4 INTERNAL CONTROL SYSTEM**

### **B.4.1 INTERNAL CONTROLS FRAMEWORK**

BGIL has an internal controls framework designed to provide assurance that business objectives, including good customer outcomes and compliance with regulations, are met.

The three lines of defence model (section B.3.2) is used within the controls framework as follows:

- The first line develops controls and performs a control self-assessment.
- The Risk Function provides a second line of defence by:
  - Coordinating control related activities and implementing the controls framework.
  - Supporting the first line in developing their controls and providing oversight of first line control self-assessments.
  - Managing the second line review of controls and performing gap analyses of all controls against regulatory frameworks.
  - Maintaining logs of controls development and analysing control effectiveness.

- Internal Audit are responsible for a third line review of controls.

Governance over the internal control framework is achieved through:

- Executive committees:
  - Responsible for embedding the controls framework and for ensuring effective controls are in place to mitigate all monitored risks.
  - Responsible for overseeing the effective implementation of the controls framework and for assessing the effectiveness of controls.
- Board sub-committees: responsible for assessing the overall quality and effectiveness of the control systems.
- The Board has overall responsibility for ensuring the internal controls and systems are adequate, appropriate, proportionate and effective in mitigating the risks to which the business is exposed.

#### **B.4.2 COMPLIANCE FUNCTION**

BGIL has a Compliance Function responsible for:

- Ensuring compliance with relevant regulatory requirements.
- Ensuring compliance with the conduct standards and individual/senior manager rules as set out by the PRA and FCA.
- Providing second line opinion and advice with respect to compliance.
- Promoting good and active working relationships with the PRA.

The Compliance Function reports to the Board and relevant sub-committees.

#### **B.5 INTERNAL AUDIT FUNCTION**

Internal Audit is outsourced to the Group Internal Audit department which uses some of its own staff as well as resource from external audit firms. Group Internal Audit reports directly to the relevant sub-committees of the Board.

#### **B.6 ACTUARIAL FUNCTION**

The Actuarial Function undertakes tasks required by Solvency II. An actuarial function report is produced annually for the Board which describes the tasks undertaken by the Actuarial Function over the year, provides recommendations, and includes opinions on technical provisions, the underwriting policy and the reinsurance policy.

The Actuarial Function is led by the Director of Underwriting and Actuarial. There is potential for conflict of interest in respect of the underwriting and reinsurance opinion, which is mitigated by a triennial independent third-party review. The last review was undertaken in 2017.

At all times, the Director of Underwriting and Actuarial has unrestricted access to relevant information and is not constrained, controlled or unduly influenced in respect of relevant actuarial matters.

## B.7 OUTSOURCING

BGIL has outsourcing arrangements for the provision of material services by third party service providers. Material services are those which are critical to the business model or are of such importance that weakness, or failure, of the services would cause detriment to customers and/or cast serious doubt upon an ability to meet regulatory requirements. BGIL will only outsource material services to group companies. Non-material services may be outsourced to external service providers if the services cannot be obtained in-house.

Material services outsourced by BGIL are as follows:

Services outsourced to British Gas Services Limited	Services outsourced to Centrica plc
Sales and Marketing	Some Ethics and Compliance activities
Product design	Finance
Policy administration	Treasury and Investment Services
Claims handling services	Internal Audit
Claims fulfilment	Information Systems
Complaints handling	Human Resources
Retail pricing	

A services agreement between BGIL and BGSL sets out the activities undertaken by each entity. Processes are in place to actively monitor and manage risks relating to these services.

No customer facing activities are outsourced outside the UK although some support services that are provided by Centrica, but are not critical to BGIL, are outsourced overseas. BGIL's Outsourcing Policy and all material outsourcing arrangements are approved by the Board and have been designed to meet all relevant regulations.

Directors and/or members of the Risk Function attend relevant management committees of group companies and analyse relevant management information to enable identification of operational and other risks arising from outsourcing arrangements.

The CRO provides regular reports to the Board on the associated risks and monitoring of the outsourced arrangements.

## B.8 ANY OTHER INFORMATION

### B.8.1 BOARD DIVERSITY POLICY

The Board ensures diversity in recruitment processes and actively promotes diversity at all levels in the business through its Diversity Policy.

Throughout the process of appointment of Board members, due regard is given to ensuring fairness and diversity through consideration of skills, experiences and competencies. The recruitment process complies with Group HR recruitment processes and the Centrica UK Diversity, Respect and Inclusion Policy.

### B.8.2 SENIOR MANAGERS AND CERTIFICATION REGIME

BGIL has complied with the Senior Managers & Certification Regime since its date of implementation of 10 December 2018.

### **B.8.3 GOVERNANCE CHANGES AFTER THE REPORTING PERIOD**

A review of governance was undertaken in 2018 and a new governance structure has been implemented with effect from 1 January 2019 which aims to:

- Improve outcomes for customers through the end-to-end view of the customer journey under common Board governance.
- Clarify accountability.
- Implement the succession plan of long-serving non-executive directors.
- Align shareholder and customer interests across the entities.

In preparation for the new arrangements, changes were made to the Board in Q3 and Q4 of 2018 as described in section B.1.3. The following appointments have also been made, effective after the reporting period:

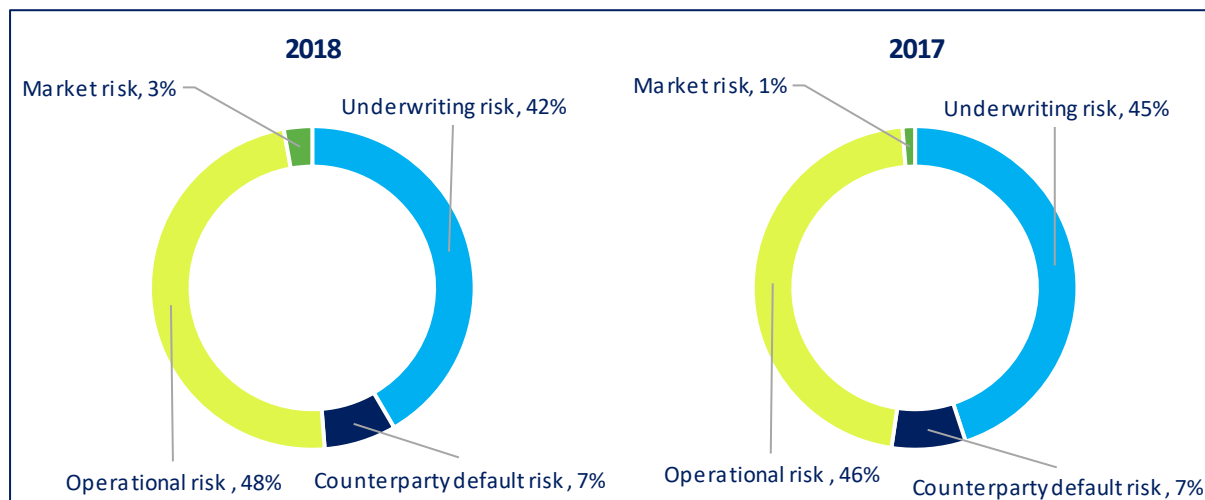
- Amanda Bowe (senior independent non-executive) appointed on 2 January 2019.
- Elizabeth Catchpole (independent non-executive) appointed on 2 January 2019.
- Sarwjit Sambhi (executive) appointed on 2 January 2019.
- Stuart Vann (independent non-executive) appointed on 23 January 2019.

Although changes have been made to governance going forwards, the system of governance in place for year ending 31 December 2018 for BGIL has been assessed to be appropriate having regard to the nature, scale and complexity of the risks inherent in the business. The changes effective from 1 January 2019 maintain appropriate standards of governance.

## C RISK PROFILE

(Unaudited)

BGIL's risk profile is a key driver of the SCR. It has not changed materially over the reporting period.



The assessment above<sup>3</sup> uses BGIL's partial internal model at both dates shown. Using SCR figures for 2017 would give slightly different proportions due to the use of the PRA-approved capital add-on (section E.2). Note that liquidity risk (section C.4) and other risks (section C.6) are not part of the SCR calculation and so are excluded.

BGIL's operational risk is similar in magnitude to its underwriting risk. This is because BGIL's underwriting risk is relatively low (section C.1).

BGIL is exposed to material risk concentrations as follows:

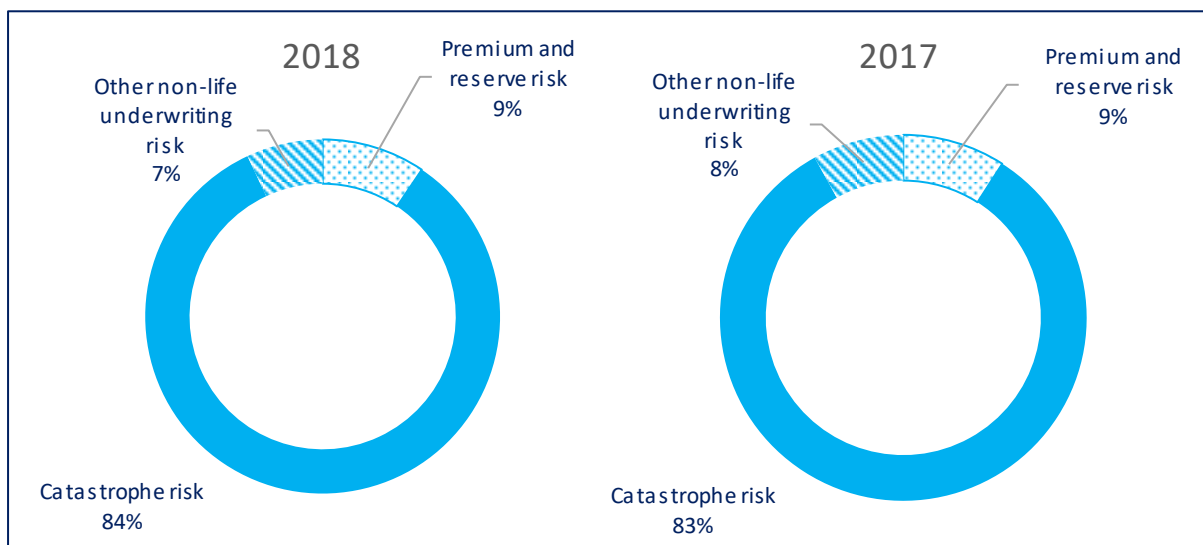
- Product concentration (underwriting risk): BGIL is a mono-line insurer operating only in the UK.
- Component concentration (underwriting risk): sales activity peaks around certain dates, such as Easter and Black Friday, which could lead to risk concentration in new product offerings such as Hive Heating.
- BGIL's outsourcing relationship with BGSL (section B.7) creates risk concentrations in terms of counterparty default risk (section C.3) and operational risk (section C.5).

### C.1 UNDERWRITING RISK

Underwriting risk refers to fluctuations in the timing, frequency and severity of insured events relative to the expectations of the undertaking at the time of underwriting.

The composition of BGIL's underwriting risk profile is shown below<sup>3</sup>. There have been no material changes to BGIL's underwriting risk profile over the year. Underwriting risk is assessed using BGIL's internal model and further details about the quantification of underwriting risk are included in section E.2.3.

<sup>3</sup> The assessments are based on pre-diversification across risk-type figures.



BGIL’s underwriting risk consists of three main elements:

- Catastrophe risk: cold weather risk is BGIL’s main driver of underwriting risk. In cold weather there is an increased demand on central heating systems, leading to higher than average boiler breakdown rates and therefore increased claims.
- Premium and reserve risk: considers the volatility of actual claims and premiums compared to those forecast in the business plan. In BGIL, premium and reserve risk is low due to:
  - BGIL’s very short claims development tail: claims are usually settled within a few days.
  - The contractual unit claims cost relationship with BGSL: BGIL pay BGSL a unit cost per claim varying by product.
  - The inherent nature of the insurable risks: in most cases, an engineer attends breakdowns rather than the settlement of the claim in cash.
- Other non-life underwriting risks relate to component defect, flooding, policy wording, pricing of premiums and claims fraud & leakage.

Lapse risk arises from non-renewal of policies (by customers) or mid-term cancellation of policies. Lapse rates for BGIL are relatively stable and of limited impact.

BGIL has several processes and controls in place to manage underwriting risk, including:

- 12-month contract terms after which the Company is entitled to decline cover, or impose renewal terms by amending premiums, policy excess (where applicable), or other policy terms and conditions as appropriate.
- First visits: when a customer first purchases a central heating policy, an engineer visits their property to assess access, safety and insurability. If the findings are adverse, then BGSL works with the customer to address the issues, or the cover is declined. For some products where a first visit does not take place, such as breakdown only, claims cannot be made within 14 days of policy inception.
- Annual service visits.

## C.2 MARKET RISK

### C.2.1 BGIL’S MARKET RISK PROFILE

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

BGIL’s long-term financial strategy is to facilitate growth without undue balance sheet risk. Its investment strategy is guided by its Investment Risk Policy which aims to mitigate market risk by restricting investments to



short duration, high-quality fixed interest securities and deposit-based investments. As a result, market risk (calculated using the Standard Formula (section E.2.4)) is low.

### **C.2.2 PRUDENT PERSON PRINCIPLE**

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

The Board is responsible for setting the overall investment risk appetite for BGIL which is articulated through the risk parameters contained in the Investment Risk Policy. The Board approves the expected investment return as part of the annual operating plan process and monitors investment performance against the plan.

An Executive committee is responsible for setting investment strategy and asset allocation within the Board approved risk parameters contained within the Investment Risk Policy. They also review and monitor the key risk indicators for the investments including performance against targets, value at risk, counterparty exposures, overall credit rating exposures and liquidity levels.

## **C.3 CREDIT RISK**

Credit risk is defined as the risk of loss resulting from fluctuations in the credit standing of issuers of securities, counterparties and any debtors to which BGIL is exposed.

### **C.3.1 COUNTERPARTY DEFAULT RISK**

The exposure to counterparty default risk arises due to BGIL's relationship with BGSL. Since BGSL collects premiums from customers on behalf of BGIL, the insolvency of BGSL could result in premiums not being paid to BGIL.

A services agreement exists between BGIL and BGSL which governs the relationship and sets out the business model interactions. Under this contract:

- BGSL pays premiums to BGIL.
- BGIL pays BGSL for each service visit or repair.
- BGIL pays BGSL commission for its role in selling and administering insurance policies on BGIL's behalf.
- The difference between the amount payable to BGIL from BGSL and that payable from BGIL to BGSL is the intercompany balance.

Several processes are in place to mitigate BGIL's exposure to counterparty default risk, including:

- The services agreement requires intercompany balance payments to be made monthly to limit exposure to a maximum of one month's debt.
- A trust arrangement has been set up, to which premiums must be diverted in the event of BGSL default.

There have been no material changes to BGIL's counterparty default risk profile over the year. The risk is assessed using BGIL's partial internal model (section E.2.5).

### **C.3.2 OTHER CREDIT RISK**

The only material exposure to credit risk is from BGSL, as described above. Exposure to credit risk on assets and liabilities on the balance sheet is not material.

BGIL does not have any outwards reinsurance and has not transferred any risk to special purpose vehicles.

## **C.4 LIQUIDITY RISK**

Liquidity risk is being unable to realise investments and other assets to settle financial obligations when they fall due.

Liquidity risk for BGIL is low and is mitigated through investment in highly liquid financial assets and regular monitoring of expected asset and liability maturities. Cash flows are forecast regularly to ensure appropriate liquidity levels are maintained. An annual asset-liability study considers liquidity in stressed scenarios.

Expected Profit In Future Premium (EPIFP), calculated in accordance with Article 260(2) of the Solvency II Delegated Act, amounted to £33.1m at 31 December 2018 (2017: £36.0m).

## C.5 OPERATIONAL RISK

Operational risk is the risk of loss, or other adverse consequences, resulting from inadequate or failed internal processes, people, systems or external events. It also includes conduct risks and regulatory risks.

A consequence of BGIL's outsourcing arrangements with BGSL (section B.7) is that many of BGIL's operational risks are derived from BGSL activities. Conduct risk is the main driver of BGIL's operational risk capital requirement. This relates to the risk that poor customer outcomes will lead to premium refunds and additional remediation costs.

Over 2018, BGIL's main mitigation controls for conduct risks were close oversight of BGSL's activities, and managing the outsourcing agreement between the two companies, which enables BGIL to recover costs from BGSL for any contractual breaches. BGIL also hold capital to fund potential losses arising from operational events.

Other key risks include tax & levies risks, and the risk of loss or impairment of BGSL. As with all companies that hold customer data, BGIL is exposed to cyber risk which is very closely monitored, particularly with regards to the loss of key IT systems and data protection.

There have been no material changes to BGIL's operational risk profile over the year. The risk is assessed using BGIL's partial internal model (section E.2.6).

## C.6 OTHER MATERIAL RISKS

The British Gas brand has a high profile in UK consumer markets and BGIL has potential exposure to brand damage contagion caused by other parts of the Group or the energy market in general. The principal direct impact of British Gas brand damage to BGIL would be a reduction in business volumes through a loss of existing business.

## C.7 ANY OTHER INFORMATION

### C.7.1 SENSITIVITY ANALYSIS

The following table shows some sensitivities, assuming that each sensitivity occurs in isolation, with no other changes.

Risk type	Sensitivity	Impact on SCR for risk type	Impact on overall SCR
Cold weather (catastrophe underwriting risk).	Increasing cold weather exposure by 10%.	+10%	+5%
Operational risk	Increasing the number of premium refunds within product risk by 30%.	+15%	+7%
Credit risk (counterparty default risk)	Lower grade default probability assumed for BGSL.	+18%	+1%

Sensitivity analysis is not presented for market risk since it is a small proportion of BGIL's overall risk profile.

### C.7.2 STRESS AND SCENARIO TESTING

Stress and scenario testing is part of BGIL's risk management process and is used to evaluate its financial position under severe, but plausible, events. It assesses the financial effect of the events that lead to specific scenarios so that their causes can be identified and their effects can be understood. The fuller appreciation of risk assists with decision making and model validation.

Stress and scenario testing is conducted at least annually. The scenarios are considered to be more extreme than 1 in 200 and the analysis reflects the Board's risk appetite with regards to capital surplus. The analysis conducted in 2018 highlights that the scenarios of most concern to BGIL relate to risks that are already under management and monitoring as part of BGIL's risk management framework. In addition, the analysis highlights that the timing of, and BGIL's ability to defer or cancel, its dividend payments (section E.1) is important in respect of the management of these very severe risk scenarios.

### C.7.3 REVERSE STRESS TESTING

BGIL also undertakes an annual reverse stress testing exercise which considers circumstances that would render BGIL's business model inviable, thereby identifying potential business vulnerabilities. Reverse stress testing starts from an outcome of business failure and identifies potential circumstances which might trigger this. This includes the extreme risks which are usually dismissed on the basis that they are very unlikely to happen and is different to general stress and scenario testing which assesses outcomes arising from changes in circumstances.

The 2018 reverse stress testing exercise reaffirmed the very low likelihood of BGIL becoming inviable. The potential causes of inviability have been explored and such causes, while not impossible, are judged implausible given the nature of BGIL's business and risk profile. Should business failure occur, BGIL has a documented plan to ensure that run-off would be made in a structured way leading to an orderly exit from the insurance market.

### C.7.4 CLIMATE RISK

The Bank of England has identified two key risks relating to climate change:

- Physical risks such as extreme weather events: BGIL includes a 1 in 200 cold weather scenario in its SCR and considers more extreme weather events as part of its stress and scenario testing.
- Transition risks arising from a move to a greener economy which could lead to a large fall in asset values in some sectors, or a higher cost of doing business:
  - There is a risk to the assistance market, within which BGIL operates, from a potential move from gas to other forms of energy such as battery storage.
  - BGIL invests in short duration, high-quality fixed interest securities and deposit-based investments so is less exposed to transition risks through its asset strategy.

BGIL is part of the Centrica group who are tackling climate change by reducing emissions across the business and providing products and services that lead to a lower carbon future.

### C.7.5 BREXIT

The risks associated with Brexit continue to be monitored. As a UK-only insurer, BGIL is not affected by passporting arrangements, or exposed to currency risk, but it is exposed to general UK economic conditions. In addition, the ability of BGSL to deliver services is potentially impacted, although contingency measures are in place.

## D VALUATION FOR SOLVENCY PURPOSES

(Audited)

The Company's annual financial statements are prepared under UK GAAP. The balance sheet on a UK GAAP basis and the Solvency II basis is shown below.

Balance sheet at 31 December	2018 UK GAAP value £m	2018 SII value £m	2018 Difference £m	2017 UK GAAP value £m	2017 SII value £m	2017 Difference £m
<b>Assets</b>						
Deferred acquisition costs	233.5	0.0	(233.5)	228.9	0.0	(228.9)
Investments						
Collective investment undertakings	129.7	129.7	0.0	198.7	198.7	0.0
Cash deposits	40.0	40.3	0.3	5.0	5.0	0.0
Insurance & intermediaries receivables	555.6	1.4	(554.2)	539.4	0.0	(539.4)
Cash and cash equivalents	0.2	0.2	0.0	0.2	0.2	0.0
Any other assets, not elsewhere shown	1.0	0.0	(1.0)	0.6	0.6	0.0
<b>Total assets</b>	<b>960.0</b>	<b>171.6</b>	<b>(788.3)</b>	<b>972.8</b>	<b>204.5</b>	<b>(768.3)</b>
<b>Liabilities</b>						
Technical provisions	(562.6)	22.3	584.9	(553.4)	0.0	553.4
Deferred tax liabilities	0.0	(6.6)	(6.6)	0.0	(6.4)	(6.4)
Insurance & intermediaries payables	(238.3)	0.0	238.3	(248.8)	0.0	248.8
Any other liabilities, not elsewhere shown	(36.2)	(36.2)	0.0	(31.7)	(31.7)	0.0
<b>Total liabilities</b>	<b>(837.1)</b>	<b>(20.5)</b>	<b>816.6</b>	<b>(833.9)</b>	<b>(38.1)</b>	<b>795.8</b>
<b>Excess of assets over liabilities/own funds</b>	<b>123.0</b>	<b>151.1</b>	<b>28.2</b>	<b>138.9</b>	<b>166.4</b>	<b>27.5</b>

Investments under UK GAAP are valued at the quoted market price at 31 December which is the same as their fair value and consistent with Solvency II requirements and so there is no difference between the two bases.

Under Solvency II, UK GAAP deferred acquisition costs and insurance debtors and creditors that are not past due are removed from the balance sheet and replaced with Solvency II provisions, such as premium provisions and risk margin. The difference between UK GAAP and Solvency II gives rise to a reconciliation reserve to which deferred tax is applied at the prevailing rate. Further detail on the calculation of technical provisions is included in section D.2.

### D.1 ASSETS

#### D.1.1 VALUE OF ASSETS

Assets at 31 December	2018 £m	2017 £m
Collective investment undertakings	129.7	198.7
Cash deposits	40.3	5.0
Insurance and intermediaries receivables	1.4	0.0
Cash and cash equivalents	0.2	0.2
Other assets	0.0	0.6
<b>Total assets</b>	<b>171.6</b>	<b>204.5</b>

The decrease in assets over the year is primarily due to higher dividends being paid in the year.

### D.1.2 BASIS OF VALUATION

Collective investment undertakings comprise units in short term money market funds. They are valued at constant net asset value so there is no bid and offer spread.

Cash deposits with financial institutions are held to maturity. Units in the funds are valued at the quoted market price at 31 December.

The cash and cash equivalents balance represents on demand balances with financial institutions at fair value.

Other assets comprise prepayments for regulatory fees & levies and interest accrued on investments.

All investments are denominated in sterling.

## D.2 TECHNICAL PROVISIONS

### D.2.1 VALUE OF TECHNICAL PROVISIONS

Non-life technical provisions at 31 December	2018 £m	2017 £m
Premium provisions	(36.1)	(34.5)
Claims provisions	8.9	29.5
<b>Total best estimate gross</b>	<b>(27.1)</b>	<b>(5.0)</b>
Risk margin	4.8	5.0
<b>Technical provisions</b>	<b>(22.3)</b>	<b>0.0</b>

Premium provisions are a negative liability reflecting the expectation that future business will be profitable. Furthermore, BGIL generally settles claims within a few days, leading to low claims provisions and a negative liability for overall technical provisions.

The change in technical provisions is mainly due to a reduction in profit commission payable at year-end, which is included within the intercompany balance element of the claims provisions.

### D.2.2 BASIS OF VALUATION

Technical provisions are defined as the discounted probability-weighted average of future cash flows. Discounting is based on EIOPA's risk free rate but has minimal impact for BGIL given that claims are generally settled within a few days. Technical provisions consist of claims provisions, premiums provisions and a risk margin.

#### Claims Provisions

Claims provisions are the discounted best estimate of all future cashflows relating to claims events prior to the valuation date.

Claims provisions consist of outstanding claims and IBNR, and include the intercompany balance at the year-end. Outstanding claims are based on claims volumes outstanding and contractual amounts due at the valuation date. IBNR relates to estimated claims that have occurred but have not yet been notified. Information on the intercompany balance is included in section C.3.1.

Given the short-tailed nature of claims, there is no allowance for ENID within claims provisions.

#### Premium Provisions

Premium provisions are the discounted best estimate of all future cashflows relating to future exposure arising from policies that BGIL is obligated to at the valuation date.

BGIL has used a simplified method to determine its premium provision, proportionate to underlying risks and taking account of Article 56 [Proportionality] of the Solvency II Delegated Act and the technical provisions requirements of PRA Supervisory Statement SS5/14.

Business plan loss ratios are used to calculate expected future profits in respect of policies in force. Allowance is also made for BBNI policies which BGIL are legally obliged to write, but have not been incepted at the valuation date, such as issued renewals. A deduction is made for mid-term cancellations on in-force policies and renewal lapses on policies invited but not taken up.

The premium provisions include an allowance for ENID, which is based on a consideration of adverse scenarios.

### Risk Margin

The risk margin increases the overall value of the technical provisions from the discounted best estimate to an amount equivalent to a theoretical level needed to transfer the obligations to another insurance undertaking.

The risk margin is estimated by applying a 6% (determined by EIOPA) cost of capital charge to the sum of the present value of the entire projected SCR in each future year. Solvency II allows the use of a partial SCR in the calculation but the use of the full SCR is considered to be appropriate and proportionate given BGIL's risk profile.

### Expenses

Solvency II requires all future expenses incurred in fulfilling existing insurance contracts to be taken into account. The table below illustrates the types of expenses included in claims and premium provisions.

Expense Type	Claims provisions	Premium provisions
Administration		✓
Investment management	✓	✓
Claims management	✓	✓
Acquisition		✓

### D.2.3 MATERIAL CHANGES TO ASSUMPTIONS

As part of ongoing process improvements, refinements made to settlement assumptions for outstanding claims have reduced claims provisions by c£1m.

### D.2.4 UNCERTAINTY

The Actuarial Function calculate the uncertainty in the technical provisions which exists in the form of potential variability in IBNR estimates, the proportion of claims likely to settle at cost, and in the plan loss ratios used to estimate BGIL's premium provision. Additionally, ENID and BBNI are naturally subject to a degree of uncertainty.

The short tail and stable nature of BGIL's insurance activities results in low levels of both absolute technical provisions and their uncertainty.

### D.3 OTHER LIABILITIES

Other liabilities at 31 December	2018 £m	2017 £m
Insurance premium tax (IPT)	31.2	28.3
Corporation tax	4.0	1.5
Sundry accruals	0.7	1.6
Other creditors	0.3	0.3
<b>Any other liabilities, not elsewhere shown</b>	<b>36.2</b>	<b>31.7</b>

#### **D.4 ALTERNATIVE METHODS FOR VALUATION**

Alternative methods of valuation for assets and liabilities permitted under EIOPA Delegated Act Article 296(4) are not applied.

#### **D.5 ANY OTHER INFORMATION**

BGIL does not use the following adjustments:

- The matching adjustment referred to in Article 77b of the Solvency II Directive.
- The volatility adjustment referred to in Article 77d of the Solvency II Directive.
- The transitional risk-free interest rate term structure referred to in Article 308c of the Solvency II Directive.
- The transitional deduction referred to in Article 308d of the Solvency II Directive.

BGIL has no reinsurance contracts and does not use special purpose vehicles and therefore has no recoverables from these arrangements.

## E CAPITAL MANAGEMENT

(E1: audited, E2 - E6: unaudited)

### E.1 OWN FUNDS

BGIL's objective is to maintain appropriate levels of capital to meet claims as they fall due, protect the interests of customers and meet operating needs and regulatory requirements.

#### E.1.1 SUMMARY OF OWN FUNDS

Eligible own funds represent Solvency II net assets less foreseeable dividends approved by the Board, but not paid at 31 December. The foreseeable dividend of £47m (2017: £56m) was approved on 8 April 2019 and is due to be paid in May 2019. The Company has the right to cancel (or defer) dividend payments or other distributions after declaration at any time prior to payment.

Own funds at 31 December	2018 £m	2017 £m
Excess of assets over liabilities (section D)	151.1	166.4
Foreseeable dividends	(47.0)	(56.0)
<b>Eligible own funds (tier 1)</b>	<b>104.1</b>	<b>110.4</b>

Composition of own funds at 31 December	2018 £m	2017 £m
Ordinary share capital (fully paid)	5.0	5.0
Reconciliation reserve	99.1	105.4
<b>Eligible own funds (tier 1)</b>	<b>104.1</b>	<b>110.4</b>

The Solvency II reconciliation reserve represents own funds less share capital and foreseeable dividends.

Reconciliation reserve at 31 December	2018 £m	2017 £m
Excess of assets over liabilities/own funds	151.1	166.4
Less: Ordinary share capital	(5.0)	(5.0)
Foreseeable dividends	(47.0)	(56.0)
<b>Reconciliation reserve</b>	<b>99.1</b>	<b>105.4</b>

The analysis of change of own funds over the year is as follows:

Analysis of change of own funds	2018 £m	2017 £m
Eligible own funds at start of year	110.4	103.8
December 2018 dividend	(20.0)	-
Increase in own funds	60.7	62.6
Foreseeable dividend	(47.0)	(56.0)
<b>Eligible own funds at end of year</b>	<b>104.1</b>	<b>110.4</b>

All own funds at 31 December 2018 and 31 December 2017 meet the criteria to be classified as Tier 1 unrestricted basic own funds as set out in Article 71 of the Solvency II Delegated Act:

- The own funds are immediately available to absorb losses.
- They are undated so there is no obligation for repayment.
- Dividends are approved by the Board and can be cancelled at any time prior to payment.
- There are no mandatory servicing costs.

All eligible own funds are available to cover the SCR (section E.2.7) and the MCR (section E.2.8).



### E.1.2 CAPITAL MANAGEMENT POLICY

A three-year business plan is prepared annually. The plan includes a projection of own funds and SCR over the three-year period. Monthly actual positions are reported against the plan. Forecast updates are prepared in the event of any significant deviation from the plan or material changes in business strategy.

Capital resources are managed in accordance with the Capital Management Policy, which is reviewed by the Board on an annual basis. The key objective is to maintain sufficient own funds to safeguard the Company's ability to continue as a going concern and to protect the interests of customers, investors and regulators while also efficiently deploying own funds and managing risk to sustain ongoing business development.

The Board has approved a risk appetite statement which says that BGIL has no appetite to hold capital below the SCR plus £30m. A 'ladder of intervention' has been designed requiring management intervention and actions at particular thresholds. Own funds are monitored to ensure that they remain within risk appetite.

BGIL's strategy is to distribute excess audited and approved own funds to its parent company, subject to ongoing business performance being within risk appetite tolerances, and any other relevant factors.

### E.1.3 DIFFERENCE BETWEEN EQUITY IN FINANCIAL STATEMENTS AND EXCESS OF ASSETS OVER LIABILITIES

The following table shows the differences between the equity in the financial statements, calculated on a UK GAAP basis, and the excess of assets over liabilities (own funds) calculated on a Solvency II basis.

UK GAAP to SII at 31 December	2018 £m	2017 £m
<b>Equity in the financial statements/shareholders funds</b>	<b>123.0</b>	<b>138.9</b>
Remove UK GAAP insurance balances	3.5	4.4
<i>Add Solvency II balances:</i>		
Premium provisions	36.1	34.5
Risk margin	(4.8)	(5.0)
Tax on reconciliation reserve	(6.6)	(6.4)
<b>Excess of assets over liabilities/own funds</b>	<b>151.1</b>	<b>166.4</b>
Foreseeable dividend	(47.0)	(56.0)
<b>Eligible own funds (tier 1)</b>	<b>104.1</b>	<b>110.4</b>

### E.1.4 ANY OTHER INFORMATION

There are no basic own fund items subject to the transitional arrangements referred to in Articles 308b(9) and 308b(10) of the Solvency II Directive.

BGIL does not have any ancillary own funds.

There are no significant restrictions affecting the availability and transferability of own funds within the undertaking.

## E.2 SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

The SCR represents the level of eligible own funds required to provide assurance that the Company can absorb significant losses in 1 in 200 scenarios and still meet policyholders' claims costs and other obligations as they fall due.

### E.2.1 PARTIAL INTERNAL MODEL

#### Uses

BGIL calculates its SCR using a partial internal model. It is also used in the ongoing management of the business as follows:

- For capital management purposes including determining the level of dividends and defining an appropriate solvency capital margin.

- In the ORSA process and report.
- To assess reinsurance requirements (currently no reinsurance is purchased).
- Setting net rates.
- Business planning.
- Product development.
- In stress and scenario testing and reverse stress testing.

### Scope

On 3 December 2018, the PRA approved an extension of the model to cover operational risk and counterparty default risk, in addition to underwriting risk. The table below shows the scope and calculation methods within BGIL's partial internal model at the reporting dates in this document.

Risk category	31 December 2018	31 December 2017
Underwriting risk	Internal model	Internal model
Operational risk	Internal model	Standard Formula plus capital add-on
Counterparty default risk	Internal model	Standard Formula plus capital add-on
Market risk	Standard Formula	Standard Formula
Aggregation technique	Standard Formula	Standard Formula

### Method

The separate risk modules of the model use different methods for the calculation of the probability distribution forecast as follows:

- Underwriting risk:
  - Catastrophe (cold weather) risk: Met Office temperature data and company-specific demand data, together with predictive modelling techniques, are used to create an empirical temperature-demand distribution from which a probability distribution is created.
  - Premium and reserve risk: attritional claims frequency is modelled stochastically.
- Operational risk: several scenarios at various return periods are considered and used to create a probability distribution.
- Counterparty default risk: uses a stochastic model based on internal and external data.

### Time Period

Solvency II requires firms to calculate the SCR over the following 12 months (Article 101 of the Solvency II Directive). Alternative methods are possible under Article 122. For BGIL, a bespoke model is used to provide sufficient protection to policyholders, in accordance with Article 122, and as approved by the PRA.

### Data

The model uses data from various internal and external sources including:

- Business plan.
- Engineer demand data.
- Met Office temperature data.
- Event loss data.
- Debt recovery rates.

The data is handled in accordance with BGIL's Data Quality Policy which ensures that relevant data is accurate, complete and appropriate, enabling BGIL to effectively manage its business and to meet regulatory and statutory obligations, including the Solvency II data quality standards.

### E.2.2 OVERALL SCR

The table below shows BGIL's SCR for each risk module.

Solvency Capital Requirement at 31 December	2018 £m	2017 £m
Non-life underwriting risk	32.4	34.1
Market risk	2.2	0.9
Counterparty default risk	5.6	9.3
Operational risk	37.7	39.7
Diversification	(4.0)	(4.4)
<b>Total SCR</b>	<b>73.9</b>	<b>79.6</b>

The figures for 2017 include £35m in respect of the PRA-approved capital add-on as follows:

PRA-approved capital add-on at 31 December	2018 £m	2017 £m
Counterparty default risk	0.0	9.3
Operational risk	0.0	29.4
Diversification	0.0	(3.7)
<b>Total capital add-on included in SCR</b>	<b>0.0</b>	<b>35.0</b>

The change in SCR over the year can be broken down as follows:

- £6.9m decrease due to approval of extended model. Further information is included in section E.2.5 and section E.2.6.
- £1.2m increase primarily due to use of updated business plan.

### E.2.3 UNDERWRITING RISK

Underwriting risk at 31 December	2018 £m	2017 £m
Premium and reserve risk	4.2	4.2
Catastrophe risk	37.2	38.4
Other non-life underwriting risk	3.1	3.7
Diversification	(12.0)	(12.2)
<b>Total underwriting risk</b>	<b>32.4</b>	<b>34.1</b>

The small decrease in risk quantification is mainly due to a reduction in cold weather exposure caused by a reduction in customer numbers.

Premium and reserve risk is net of a profit offset. In 2018, the calculation moved to a Solvency II basis (from UK GAAP in 2017). This has reduced premium and reserve risk by c£1m, offset by use of the updated business plan.

### E.2.4 MARKET RISK

Market risk is calculated using the Standard Formula as it is considered to fairly reflect BGIL's risk profile and capital requirement arising. No material simplifications permitted in the Standard Formula have been used.

Market risk at 31 December	2018 £m	2017 £m
Interest rate risk	0.3	0.5
Spread risk	0.0	0.0
Concentration risk	2.1	0.8
Diversification	(0.3)	(0.4)
<b>Total market risk</b>	<b>2.2</b>	<b>0.9</b>

The increase in concentration risk reflects a higher concentration of individual funds exceeding the 3% threshold determined in the Standard Formula. BGIL's investments are all sterling-denominated and so there is no currency risk.

#### E.2.5 COUNTERPARTY DEFAULT RISK

While there has been no change to BGIL's view of the quantification of counterparty default risk, the assessment included in the SCR has decreased by £3.7m following PRA approval to extend BGIL's partial internal model to cover counterparty default risk (section E.2.1).

The 2017 figures included a capital add-on which was based on BGIL's assessment of counterparty default risk in 2015, when the add-on was approved by the PRA. Since 2015, improved business processes have been implemented to reduce counterparty exposure, reducing the capital requirement.

Counterparty default risk (credit risk) at 31 December	2018 £m	2017 £m
Standard Formula	N/A	negligible
PRA-approved capital add-on	N/A	9.3
Partial Internal Model	5.6	N/A
<b>Total counterparty default risk</b>	<b>5.6</b>	<b>9.3</b>

#### E.2.6 OPERATIONAL RISK

Although there have been no material changes to BGIL's operational risk profile over the year, the assessment of operational risk has decreased following PRA approval to extend BGIL's partial internal model to cover operational risk (section E.2.1). The 2017 figures included a PRA-approved capital add-on which reflected BGIL's view of operational risk in 2015 when the add-on was calculated and the risk profile has evolved since that time. The decrease due to the use of the extended model is partially offset by an increase due to using the updated business plan in the model.

Operational risk at 31 December	2018 £m	2017 £m
Standard Formula	N/A	10.3
PRA-approved capital add-on	N/A	29.4
Partial Internal Model	37.7	N/A
<b>Total operational risk</b>	<b>37.7</b>	<b>39.7</b>

#### E.2.7 RATIO OF ELIGIBLE OWN FUNDS TO SCR

Eligible own funds maintain a surplus of over £30m, with a capital coverage ratio of 141%.

Solvency II surplus at 31 December	2018 £m	2017 £m
Eligible own funds (tier 1)	104.1	110.4
Solvency Capital Requirement	73.9	79.6
<b>Solvency II surplus</b>	<b>30.2</b>	<b>30.8</b>
<b>Ratio of eligible own funds to SCR</b>	<b>141%</b>	<b>139%</b>

### E.2.8 MINIMUM CAPITAL REQUIREMENT

BGIL are required to report the MCR which is a regulatory figure representing the absolute minimum level below which own funds should not fall.

While the SCR is driven by a bespoke, PRA-approved model designed to reflect BGIL's risk profile, the MCR calculation is a linear formula based on GWP and technical provisions and is subject to a defined floor of 25% of SCR and a cap of 45% of SCR. As such, caution needs to be exercised when comparing with BGIL's SCR, or with the MCR of other companies.

The MCR (based on 45% of SCR) and capital coverage of the MCR is shown below.

Capital coverage of MCR at 31 December	2018 £m	2017 £m
Eligible own funds (tier 1)	104.1	110.4
MCR	33.3	35.8
<b>Ratio of eligible own funds to MCR</b>	<b>313%</b>	<b>308%</b>

### E.3 USE OF THE DURATION-BASED EQUITY RISK SUB-MODULE IN THE CALCULATION OF THE SCR

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

### E.4 DIFFERENCES BETWEEN THE STANDARD FORMULA AND PARTIAL INTERNAL MODEL

The following table shows how BGIL's SCR calculated using the PRA-approved partial internal model compares with the calculation using the Standard Formula. Figures for the partial internal model for 2017 include £35m in respect of the PRA-approved capital add-on (section E.2.2).

Comparison with Standard Formula at 31 December	2018	2018	2018	2017	2017	2017
	Standard Formula £m	Partial Internal Model £m	Difference £m	Standard Formula £m	Partial Internal Model £m	Difference £m
Non-life underwriting risk	281.7	32.4	(249.3)	282.3	34.1	(248.2)
Market risk	2.2	2.2	0.0	0.9	0.9	0.0
Counterparty default risk	0.3	5.6	5.3	0.0	9.3	9.3
Diversification	(1.8)	(4.0)	(2.2)	(0.7)	(4.4)	(3.7)
<b>Basic solvency capital requirement</b>	<b>282.4</b>	<b>36.2</b>	<b>(246.2)</b>	<b>282.5</b>	<b>39.9</b>	<b>(242.6)</b>
Operational risk	30.7	37.7	7.0	30.9	39.7	8.8
<b>Solvency Capital Requirement</b>	<b>313.1</b>	<b>73.9</b>	<b>(239.2)</b>	<b>313.4</b>	<b>79.6</b>	<b>(233.8)</b>

The Standard Formula for underwriting risk produces a capital requirement higher than under BGIL's internal model due to material differences in the assumptions used by EIOPA in the Standard Formula and those used in BGIL's internal model. The internal model better reflects BGIL's low underwriting risk characterised by the short tail nature of the business and contractually fixed unit claims costs.

Counterparty default risk calculated using the Standard Formula is negligible and does not adequately reflect BGIL's business relationship with BGSL.

Under the Standard Formula calculation, operational risk capital is based on gross earned premium at the year-end and does not adequately reflect BGIL's risk profile.

BGIL's partial internal model uses the Standard Formula to calculate market risk as this is considered to fairly reflect BGIL's risk profile.

No material simplifications have been made within the Standard Formula calculation.

BGIL does not use any undertaking-specific parameters within the Standard Formula calculation.

**E.5 NON-COMPLIANCE WITH THE MCR AND NON-COMPLIANCE WITH THE SCR**

BGIL has maintained sufficient own funds to meet both the SCR and the MCR throughout the reporting period.

**E.6 ANY OTHER INFORMATION**

There is no other material information to report.

**F GLOSSARY**

Term	Meaning within document
BBNI	Bound But Not Incepted
BGIL or the Company	British Gas Insurance Limited
BGSL	British Gas Services Limited
COR	Combined Operating Ratio
CRO	Chief Risk Officer
EIOPA	European Insurance and Occupational Pensions Authority
ENID	Events Not In Data
EPIFP	Expected Profit in Future Premium
FCA	Financial Conduct Authority
GBGH	GB Gas Holdings Limited
IBNR	Incurred But Not Reported
MCR	Minimum Capital Requirement
ORSA	Own Risk and Solvency Assessment
PRA	Prudential Regulation Authority
PIM	Partial Internal Model
SCR	Solvency Capital Requirement
Solvency II Directive	Directive 2009/138/EC of the European Parliament and of the Council
Solvency II Delegated Act	Commission Delegated Regulation (EU) 2015/35
UK GAAP	UK Generally Accepted Accounting Practice

# British Gas Insurance Limited

## Solvency and Financial Condition Report

### Disclosures

31 December

**2018**

(Monetary amounts in GBP thousands)



## General information

Undertaking name	British Gas Insurance Limited
Undertaking identification code	213800QKXD83EEO79W25
Type of code of undertaking	LEI
Type of undertaking	Non-life undertakings
Country of authorisation	GB
Language of reporting	en
Reporting reference date	31 December 2018
Currency used for reporting	GBP
Accounting standards	Local GAAP
Method of Calculation of the SCR	Partial internal model
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

## List of reported templates

- S.02.01.02 - Balance sheet
- S.05.01.02 - Premiums, claims and expenses by line of business
- S.05.02.01 - Premiums, claims and expenses by country
- S.17.01.02 - Non-Life Technical Provisions
- S.19.01.21 - Non-Life insurance claims
- S.23.01.01 - Own Funds
- S.25.02.21 - Solvency Capital Requirement - for undertakings using the standard formula and partial internal model
- S.25.02.21 - Solvency Capital Requirement - for undertakings using the standard formula and partial internal model
- S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

S.02.01.02

Balance sheet

Solvency II value	
C0010	
	0
	170,013
	0
	0
	0
	0
	0
	0
	0
	0
	0
	0
	129,728
	40,285
	0
	0
	0
	0
	0
	0
	0
	0
	1,406
	0
	226
	171,645

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

S.02.01.02

Balance sheet

		Solvency II value
		C0010
<b>Liabilities</b>		
R0510	Technical provisions - non-life	-22,319
R0520	<i>Technical provisions - non-life (excluding health)</i>	-22,319
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	-27,139
R0550	<i>Risk margin</i>	4,820
R0560	<i>Technical provisions - health (similar to non-life)</i>	0
R0570	<i>TP calculated as a whole</i>	0
R0580	<i>Best Estimate</i>	0
R0590	<i>Risk margin</i>	0
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	<i>Technical provisions - health (similar to life)</i>	0
R0620	<i>TP calculated as a whole</i>	
R0630	<i>Best Estimate</i>	
R0640	<i>Risk margin</i>	
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	0
R0660	<i>TP calculated as a whole</i>	
R0670	<i>Best Estimate</i>	
R0680	<i>Risk margin</i>	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	<i>TP calculated as a whole</i>	
R0710	<i>Best Estimate</i>	
R0720	<i>Risk margin</i>	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	6,618
R0790	Derivatives	
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	
R0830	Reinsurance payables	
R0840	Payables (trade, not insurance)	
R0850	Subordinated liabilities	0
R0860	<i>Subordinated liabilities not in BOF</i>	
R0870	<i>Subordinated liabilities in BOF</i>	0
R0880	Any other liabilities, not elsewhere shown	36,198
R0900	<b>Total liabilities</b>	20,497
R1000	<b>Excess of assets over liabilities</b>	151,149

S.05.01.02

Premiums, claims and expenses by line of business

Non-life

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)													Line of business for: accepted non-proportional reinsurance				Total	
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	Misc. financial loss	Health	Casualty	Marine, aviation and transport	Property	C0200		
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160			
<b>Premiums written</b>																		
R0110	Gross - Direct Business										1,033,758							1,033,758
R0120	Gross - Proportional reinsurance accepted																	0
R0130	Gross - Non-proportional reinsurance accepted																	0
R0140	Reinsurers' share																	0
R0200	Net										1,033,758							1,033,758
<b>Premiums earned</b>																		
R0210	Gross - Direct Business										1,023,169							1,023,169
R0220	Gross - Proportional reinsurance accepted																	0
R0230	Gross - Non-proportional reinsurance accepted																	0
R0240	Reinsurers' share																	0
R0300	Net										1,023,169							1,023,169
<b>Claims incurred</b>																		
R0310	Gross - Direct Business										470,243							470,243
R0320	Gross - Proportional reinsurance accepted																	0
R0330	Gross - Non-proportional reinsurance accepted																	0
R0340	Reinsurers' share																	0
R0400	Net										470,243							470,243
<b>Changes in other technical provisions</b>																		
R0410	Gross - Direct Business																	0
R0420	Gross - Proportional reinsurance accepted																	0
R0430	Gross - Non-proportional reinsurance accepted																	0
R0440	Reinsurers' share																	0
R0500	Net										0							0
R0550	<b>Expenses incurred</b>										476,983							476,983
R1200	<b>Other expenses</b>																	3,129
R1300	<b>Total expenses</b>																	480,112

S.05.02.01

Premiums, claims and expenses by country

Non-life

	C0010	C0020	C0030	C0040	C0050	C0060	C0070
	Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations			Top 5 countries (by amount of gross premiums written) - non-life obligations		Total Top 5 and home country
	C0080	C0090	C0100	C0110	C0120	C0130	C0140
R0010							
	<b>Premiums written</b>						
R0110	1,033,758						1,033,758
R0120							0
R0130							0
R0140							0
R0200	1,033,758	0	0	0	0	0	1,033,758
	<b>Premiums earned</b>						
R0210	1,023,169						1,023,169
R0220							0
R0230							0
R0240							0
R0300	1,023,169	0	0	0	0	0	1,023,169
	<b>Claims incurred</b>						
R0310	470,243						470,243
R0320							0
R0330							0
R0340							0
R0400	470,243	0	0	0	0	0	470,243
	<b>Changes in other technical provisions</b>						
R0410							0
R0420							0
R0430							0
R0440							0
R0500	0	0	0	0	0	0	0
R0550	476,983						476,983
R1200							3,129
R1300							480,112

S.17.01.02

Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance											Accepted non-proportional reinsurance				Total Non-Life obligation	
		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	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance		Non-proportional property reinsurance
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
R0010	<b>Technical provisions calculated as a whole</b>											0						0
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole																	0
<b>Technical provisions calculated as a sum of BE and RM Best estimate</b>																		
<b>Premium provisions</b>																		
R0060	Gross											-36,064						-36,064
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default																	0
R0150	<b>Net Best Estimate of Premium Provisions</b>											-36,064						-36,064
<b>Claims provisions</b>																		
R0160	Gross											8,926						8,926
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default																	0
R0250	<b>Net Best Estimate of Claims Provisions</b>											8,926						8,926
R0260	<b>Total best estimate - gross</b>											-27,139						-27,139
R0270	<b>Total best estimate - net</b>											-27,139						-27,139
R0280	<b>Risk margin</b>											4,820						4,820
<b>Amount of the transitional on Technical Provisions</b>																		
R0290	Technical Provisions calculated as a whole																	0
R0300	Best estimate																	0
R0310	Risk margin																	0
R0320	<b>Technical provisions - total</b>											-22,319						-22,319
R0330	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total											0						0
R0340	<b>Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total</b>											-22,319						-22,319

S.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020 Accident year / underwriting year

Gross Claims Paid (non-cumulative)														
(absolute amount)														
Year	C0010	C0020	C0030	C0040	Development year						C0100	C0110	C0170	C0180
	0	1	2	3	4	5	6	7	8	9	10 & +	In Current year	Sum of years (cumulative)	
R0100	Prior											0	0	0
R0160	2009	2,153	102	0	0	0	0	0	0	0	0	0	2,255	
R0170	2010	192,373	5,153	0	0	0	0	0	0	0	0	0	197,526	
R0180	2011	525,073	4,585	0	0	0	0	0	0	0	0	0	529,658	
R0190	2012	544,973	6,819	0	0	0	0	0	0	0	0	0	551,792	
R0200	2013	561,863	6,777	0	0	0	0	0	0	0	0	0	568,640	
R0210	2014	523,184	7,715	0	0	0	0	0	0	0	0	0	530,898	
R0220	2015	506,000	4,495	0	0	0	0	0	0	0	0	0	510,495	
R0230	2016	485,542	5,811	0	0	0	0	0	0	0	0	0	491,353	
R0240	2017	472,645	7,423	0	0	0	0	0	0	0	0	7,423	480,069	
R0250	2018	508,033	0	0	0	0	0	0	0	0	0	508,033	508,033	
R0260												Total	515,457	4,370,719

Gross Undiscounted Best Estimate Claims Provisions													
(absolute amount)													
Year	C0200	C0210	C0220	C0230	Development year						C0300	C0360	
	0	1	2	3	4	5	6	7	8	9	10 & +	Year end (discounted data)	
R0100	Prior											0	
R0160	2009	0	0	0	0	0	0	0	0	0	0	0	
R0170	2010	0	0	0	0	0	0	0	0	0	0	0	
R0180	2011	0	0	0	0	0	0	0	0	0	0	0	
R0190	2012	0	0	0	0	0	0	0	0	0	0	0	
R0200	2013	0	0	0	0	0	0	0	0	0	0	0	
R0210	2014	0	0	0	0	0	0	0	0	0	0	0	
R0220	2015	0	0	0	0	0	0	0	0	0	0	0	
R0230	2016	0	0	0	0	0	0	0	0	0	0	0	
R0240	2017	0	0	0	0	0	0	0	0	0	0	0	
R0250	2018	8,926	0	0	0	0	0	0	0	0	0	8,926	
R0260												Total	8,926

S.23.01.01

Own Funds

Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35

R0010	Ordinary share capital (gross of own shares)
R0030	Share premium account related to ordinary share capital
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings
R0050	Subordinated mutual member accounts
R0070	Surplus funds
R0090	Preference shares
R0110	Share premium account related to preference shares
R0130	Reconciliation reserve
R0140	Subordinated liabilities
R0160	An amount equal to the value of net deferred tax assets
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above
R0220	<b>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</b>
R0230	<b>Deductions for participations in financial and credit institutions</b>
R0290	<b>Total basic own funds after deductions</b>

Ancillary own funds

R0300	Unpaid and uncalled ordinary share capital callable on demand
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand
R0320	Unpaid and uncalled preference shares callable on demand
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC
R0390	Other ancillary own funds
R0400	<b>Total ancillary own funds</b>

Available and eligible own funds

R0500	Total available own funds to meet the SCR
R0510	Total available own funds to meet the MCR
R0540	Total eligible own funds to meet the SCR
R0550	Total eligible own funds to meet the MCR

R0580	<b>SCR</b>
R0600	<b>MCR</b>
R0620	<b>Ratio of Eligible own funds to SCR</b>
R0640	<b>Ratio of Eligible own funds to MCR</b>

Reconciliation reserve

R0700	Excess of assets over liabilities
R0710	Own shares (held directly and indirectly)
R0720	Foreseeable dividends, distributions and charges
R0730	Other basic own fund items
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds
R0760	<b>Reconciliation reserve</b>

Expected profits

R0770	Expected profits included in future premiums (EPIFP) - Life business
R0780	Expected profits included in future premiums (EPIFP) - Non- life business
R0790	<b>Total Expected profits included in future premiums (EPIFP)</b>

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
5,000	5,000		0	
0	0		0	
0	0		0	
0		0	0	0
0	0			
0		0	0	0
0		0	0	0
99,149	99,149			
0		0	0	0
0				0
0	0	0	0	0
0				
0				
0				
0				
0				
0			0	0
104,149	104,149	0	0	0

0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0				
0			0	0

104,149	104,149	0	0	0
104,149	104,149	0	0	
104,149	104,149	0	0	0
104,149	104,149	0	0	

73,892
33,251
140.95%
313.22%

C0060
151,149
0
47,000
5,000
0
99,149

-33,128
-33,128



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**Solvency Capital Requirement -  
for undertakings using the standard formula and partial internal model**

USP Key	USP Key	USP Key
<b>For life underwriting risk:</b>	<b>For health underwriting risk:</b>	<b>For non-life underwriting risk:</b>
1 - Increase in the amount of annuity benefits	1 - Increase in the amount of annuity benefits	4 - Adjustment factor for non-proportional reinsurance
9 - None	2 - Standard deviation for NSLT health premium risk	6 - Standard deviation for non-life premium risk
	3 - Standard deviation for NSLT health gross premium risk	7 - Standard deviation for non-life gross premium risk
	4 - Adjustment factor for non-proportional reinsurance	8 - Standard deviation for non-life reserve risk
	5 - Standard deviation for NSLT health reserve risk	9 - None
	9 - None	

	Unique number of component	Component description	Calculation of the Solvency Capital Requirement	Amount modelled	USP	Simplifications
	C0010	C0020	C0030	C0070	C0090	C0120
1	50100I	Premium risk	4,206	4,206	9	
2	50300I	non-life catastrophe risk	37,176	37,176	9	
3	50500I	Other non-life uw risk	3,055	3,055	9	
4	55900I	non-life uw diversification	-11,996	-11,996	9	
5	10200I	Interest rate risk	329		9	
6	10700I	Spread risk	20		9	
7	10800I	Concentration risk	2,145		9	
8	19900I	Market risk - Diversification	-324		9	
9	20100I	Counterparty default risk	5,588		9	
10	70100I	Operational risk	37,684		9	

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**Solvency Capital Requirement - for undertakings using the standard formula and partial internal model**

**Calculation of Solvency Capital Requirement**

	C0100
R0110 Total undiversified components	77,885
R0060 Diversification	-3,993
R0160 Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	
<b>R0200 Solvency capital requirement excluding capital add-on</b>	<b>73,892</b>
R0210 Capital add-ons already set	
<b>R0220 Solvency capital requirement</b>	<b>73,892</b>

**Other information on SCR**

R0300 Amount/estimate of the overall loss-absorbing capacity of technical provisions	
R0310 Amount/estimate of the overall loss-absorbing capacity of deferred taxes	0
R0400 Capital requirement for duration-based equity risk sub-module	
R0410 Total amount of Notional Solvency Capital Requirements for remaining part	
R0420 Total amount of Notional Solvency Capital Requirement for ring fenced funds	
R0430 Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	
R0440 Diversification effects due to RFF nSCR aggregation for article 304	

S.28.01.01

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

Linear formula component for non-life insurance and reinsurance obligations		C0010		
R0010	MCR <sub>NL</sub> Result	86,490		
			Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
			C0020	C0030
R0020	Medical expense insurance and proportional reinsurance		0	
R0030	Income protection insurance and proportional reinsurance		0	
R0040	Workers' compensation insurance and proportional reinsurance		0	
R0050	Motor vehicle liability insurance and proportional reinsurance		0	
R0060	Other motor insurance and proportional reinsurance		0	
R0070	Marine, aviation and transport insurance and proportional reinsurance		0	
R0080	Fire and other damage to property insurance and proportional reinsurance		0	
R0090	General liability insurance and proportional reinsurance		0	
R0100	Credit and suretyship insurance and proportional reinsurance		0	
R0110	Legal expenses insurance and proportional reinsurance		0	
R0120	Assistance and proportional reinsurance		0	1,017,528
R0130	Miscellaneous financial loss insurance and proportional reinsurance		0	
R0140	Non-proportional health reinsurance		0	
R0150	Non-proportional casualty reinsurance		0	
R0160	Non-proportional marine, aviation and transport reinsurance		0	
R0170	Non-proportional property reinsurance		0	
Linear formula component for life insurance and reinsurance obligations		C0040		
R0200	MCR <sub>L</sub> Result	0		
			Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
			C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits			
R0220	Obligations with profit participation - future discretionary benefits			
R0230	Index-linked and unit-linked insurance obligations			
R0240	Other life (re)insurance and health (re)insurance obligations			
R0250	Total capital at risk for all life (re)insurance obligations			
Overall MCR calculation		C0070		
R0300	Linear MCR	86,490		
R0310	SCR	73,892		
R0320	MCR cap	33,251		
R0330	MCR floor	18,473		
R0340	Combined MCR	33,251		
R0350	Absolute floor of the MCR	2,222		
R0400	Minimum Capital Requirement	33,251		