Seamair Insurance DAC

Solvency & Financial Condition Report (SFCR)

December 31, 2018

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INTRODUCTION

This Report refers to the business of Seamair Insurance DAC ('Seamair', or 'the Company'), a captive insurer, authorised and supervised by the Central Bank of Ireland. It provides the reader with information on the Company's business and performance, system of governance, risk profile, valuation for solvency purposes and capital management for the reporting period ended 31 December 2018.

Seamair Insurance DAC has prepared the below Solvency and Financial Condition Report on a solo basis in accordance with the regulations set out in Articles 292 –297 of the Solvency II Delegated Acts together with the Guidelines on reporting and public disclosure issued by EIOPA.

The Company's business strategy is to provide coverage for certain risks of Celgene Corporation ("Celgene") which is is an American biotechnology company that discovers, develops and commercializes medicines for cancer and inflammatory disorders. The impact of insurance risk volatility on the Company's capital base is mitigated through appropriate aggregate protection. Investment of the Company's funds is in line with the documented investment strategy, reflecting a 'prudent person' approach to the management of counterparty, concentration, interest rate and currency risk.

The Board has identified the key risks to which Seamair is exposed and established appropriate corporate governance, risk management and reporting mechanisms to ensure that the identified risks remain relevant, and that they are managed and reported on with appropriate levels of detail and frequency. The Company has established a comprehensive suite of risk policies and implemented a series of internal controls to ensure that Seamair can be managed in accordance with its governance and risk management systems. Documented escalation mechanisms are in place to ensure that any breaches in risk limits and tolerances, internal controls and governance requirements can be reported promptly to the appropriate individuals. Risks to which the Company is exposed are well understood and are used to determine the level of solvency and capital required over the business planning period and to better inform decision making within the Company.

There were no material changes to Seamair's business and performance, system of governance, risk profile, valuation for solvency purposes and capital management over the reporting period.

As at 31 December 2018, the Company had eligible own funds of US$61.3m (2017: US$53.4m) available to meet its Solvency Capital Requirement ("SCR") of US$19.5m (2017: US$17.8m); resulting is a Solvency Ratio of 315% (2017: 299%) which is in compliance with the regulatory solvency requirements per the Solvency II regulations. The Board of Directors is satisfied that the Company has adequate and appropriate capital to support its business operations. The Minimum Capital Requirement ("MCR") was also satisfactorily met at the year-end. There were no instances of non-compliance with the capital requirements during the period.

A. BUSINESS & PERFORMANCE

A.1 Business

Seamair is incorporated in Ireland and is licensed by the Central Bank of Ireland ("CBI") as a captive insurance undertaking. Seamair conducts all of its significant business activities, including underwriting, premium invoicing & collection, claims reserving & payments, and investing from its offices in Ireland. As such Seamair strives to ensure compliance with all relevant Irish laws and regulations.

The Company's operating and registered address is:
3rd Floor Metropolitan Building,
James Joyce Street
Dublin 1,
Ireland

Seamair is authorised by the CBI, under the European Union (Insurance and Reinsurance) Regulations 2015, to carry out the business of non-life insurance for the following classes;

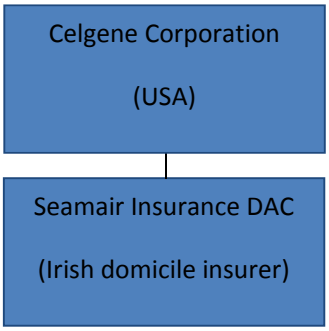
- Medical expense;
- Workers compensation (WC);
- Other motor;
- Marian, aviation and transport;
- Fire and other damage to property (PDBI); and
- General Liability (GL).

The CBI's address is:

New Wapping Street,
North Wall Quay,
Dublin 1,
Ireland.

The Company's external auditor is KPMG Chartered Accountants, located at 1 Harbourmaster Place, IFSC, Dublin 1.

Seamair is wholly owned by Celgene Corporation ("Celgene"), a company incorporated in the United States of America and listed on the NASDAQ. Seamair was incorporated on 22 June 2009, to act as a direct writing insurance company for Celgene and its subsidiaries.



Details on other Group subsidiaries and related undertakings are published within the Celgene Annual Report and Financial Statements, 2017, which is available to download at https://ir.celgene.com/financial-information/annual-reports-and-proxy/default.aspx

The operation of the Company is subject to the local regulatory requirements in Ireland within which it operates. Such regulations not only prescribe approval and monitoring of activities but also impose certain restrictive provisions, for example capital adequacy to minimize the risk of default and insolvency on the part of the Company to meet unforeseen liabilities as they arise.

A.2 Underwriting Performance

The principal risks and uncertainties that the Company faces are, by the very nature of the business, those for which it provides or has provided insurance cover. The Company seeks to ensure that it collects sufficient premium income to meet the cost of potential claims over time, but the uncertainty surrounding the severity and frequency of claims can lead to significant variation in the Company's performance in the short term. Whilst considerable judgment is involved, the Directors adopt an appropriately prudent approach to the provision and valuation of adequate insurance reserves, with annual support and certification being provided by an external actuary who serves as the Head of Actuarial Function.

Since the Company prepares its financial statements in accordance with FRS, the underwriting performance information given in this section is on an FRS basis. Premiums written relate to business incepted during the financial year. Provision is made for notified losses on all underwriting years. The Company does not purchase reinsurance cover. Profit after tax for the year ended 31 December 2018 amounted to US$11.3m (2017: US$9.8m).

The table below shows the Company's premiums, claims and expenses split by SII lines of business for the year ended 31 December 2018, all expressed in US$:

Year ended 31/12/2018	Medical expense	Workers' comp	Motor vehicle liability	Other motor	Marine, aviation and transport	Fire and other damage to property	General liability	Total
Gross premiums written (Direct)	100,000	500,000	800,000	700,000	200,000	550,000	8,288,423	11,138,423
Gross premiums written (Proportional Reinsurance)	-	-	-	-	-	-	260,450	260,450
Gross premiums earned (Direct)	100,000	464,481	728,962	806,558	200,000	550,000	7,955,299	10,805,300
Gross premiums earned (Proportional Reinsurance)	-	-	-	-	-	-	4,336,061	4,336,061
Gross claims incurred	-	(459,902)	(725,234)	(610,254)	(59,216)	(134,269)	(960,672)	(2,949,547)
Expenses	(3,378)	(15,690)	(24,624)	(27,245)	(6,756)	(18,578)	(923,827)	(1,020,098)
Technical interest	5,755	26,731	41,952	46,417	11,510	31,652	707,364	871,381
Technical Profit	**102,377**	**15,620**	**21,056**	**215,476**	**145,538**	**428,805**	**11,114,225**	**12,043,097**

Gross premiums written relate to related party accident & health, fire & other damage to property, marine, motor vehicle and liability risks located in the European Union and the United States of

America. All premiums resulted from contracts of insurance concluded in the Republic of Ireland. Gross premium written for year ended 31 December 2018 amounted to US$11.4m (2017: US$20.7m).

Gross and net claims paid during the financial year ended 31 December 2018 totalled US$2m (2017: US$1.3m). As at 31 December 2018, the Company held gross and net claims provisions of US$10m (2017: US$9.1m).

A.3 Investment Performance

The Company's investment policy is in line with that of the Celgene Group. The Company invests its funds with highly rated financial institutions which include at present, Credit Agricole, Deutsche Bank, Citibank, Barclays and Société Générale. The majority of the Company's funds are invested in fixed term deposits with maturities ranging from 3 months to a maximum of 9 months. The range of maturities aides liquidity and ensures that funds do not need to be withdrawn prior to maturity. In 2018 the Company entered into a lending agreement with Celgene and loaned funds in the amount of US$32m. Interest is earned on the intercompany loan on an arms' length basis.

The investment income for the year amounted to US$1.8m compared to income of US$1m in 2017, the increase as a result of a larger investment base and more favourable interest rates being offered by the financial institutions and Celgene on the intercompany loan.

A.4 Performance of Other Activities

The Company's only activity is that of a captive insurer and it has not entered into any leasing agreements.

Operating costs of the Company excluding foreign exchange are charged through the Technical Account of the Profit and Loss Statement.

There were no dividends paid during the year (2017: nil).

A.5 Any Other Information

There is no other information to report.

B. SYSTEM OF GOVERNANCE

B.1 General Information on the System of Governance

The Company is classified as a Low Risk firm under the Central Bank of Ireland's risk-based framework for the supervision of regulated firms, known as PRISM or Probability Risk and Impact System and is subject to the Central Bank of Ireland's Corporate Governance Requirements for Insurance Undertakings 2015.

In aiming to meet the requirements for sound corporate governance, ensuring efficient conduct of business and to protect the interests of the Company's stakeholders, the Company has a comprehensive Governance and Risk Management system in place.

It is the responsibility of the Board of Directors to ensure that risks are fully understood and appropriately managed in accordance with this framework. Risk management, reporting and auditing processes reflect the requirements set out in this Governance Manual.

The Governance and Risk Management System of the Company may be described as relying on four cornerstones:

1) Governance Framework, aligned with the Company's strategic objectives, providing top level oversight by the Board, clear ownership and accountability for risks, as well as clear escalating and reporting channels.

2) Risk Management System which details the Company's strategic objectives in documented Risk Policies. For each risk, limits and operational checkpoints as well as functional identification mitigation and monitoring processes are documented.

3) A series of Internal Controls, defining the architecture of processes required to manage the Company in accordance with its Governance and risk management framework.

4) A Risk Register combining operational and risk management processes to deliver a descriptive analysis of material risks threatening at least one of the Company's global strategy objectives.

There have been no material changes to this structure since the prior reporting period. Seamair implemented the above framework in advance of the inception of Solvency II.

Given the limited scale and complexity of the Company, and having reviewed the risks facing the company thoroughly, the Board are satisfied that the system of governance in place is adequate.

The various functions assisting the Board, including the Compliance Function, have defined lines of reporting directly to the Board. In relation to any violation of relevant law by the Company the Compliance Function as well as reporting to the Board, will, in certain circumstances, also be required to report to outside bodies such as the Central Bank of Ireland.

B.2 Fit & Proper requirements

Seamair has documented its Fitness & Probity policy specifying out the Company's approach to the selection and assessment of the persons who effectively run the Company or are responsible for other key functions.

In selecting individuals as directors or function holders, the Company takes account of the following factors:

- specific requirements of the role
- the skills, experience and relevant qualifications of the proposed individual
- results of due diligence enquiries
- conflicts of interest
- time requirements and other commitments
- competence and integrity
- financial soundness

Consideration is given to ensuring an appropriate mix of knowledge, skills and experience across the Board of Directors and for those roles where specialist skills are required e.g. Head of Actuarial Function, only those individuals possessing the pertinent qualifications and expertise will be considered.

For those roles which are prescribed by the CBI as Controlled Functions (CFs) and Pre-approval Controlled Functions (PCFs), the Compliance function adopts appropriate control and due diligence processes in the selection and vetting of such individuals to ensure that they meet the regulator's fit and proper criteria. Written approval from the CBI is obtained prior to the appointment of PCFs. Appointed individuals are required to maintain on-going compliance with the Standards of Fitness & Probity and the guidance issued by the CBI. This is assessed by the Company on an annual basis.

Roles and Responsibilities Detail

Key Roles	Outsourcing	Responsible
Board of Directors	No	Catherine Elflein (Chairman) David Pignolet Vincent Barrett Paul Gallen
Risk Management Function	Yes (External)	Aon Insurance Manager's (Dublin) Limited
Compliance Function	Yes (External)	Aon Insurance Managers (Dublin) Limited
Operations - Underwriting/Claims Management	Yes (External)	Aon Insurance Managers (Dublin) Limited
Operations - Finance and Accounting	Yes (External)	Aon Insurance Managers (Dublin) Limited
Operations - Investment	Yes (External)	Aon Insurance Managers (Dublin) Limited
Operations - Administration	Yes (External)	Aon Insurance Managers (Dublin) Limited

Internal Audit Function	Yes (External)	Aon Commercial Services Ireland Limited
Actuarial Function	Yes (External)	Aon Actuarial & Analytics

The Company has a remuneration policy in place that outlines the terms and conditions of Non-Executive Directors of the Company. A management fee is paid by the Company to the appointed management Company, Aon Insurance Managers (Dublin) Limited (AIMD) for services provided. All Directors of the Company are employed by Celgene and do not receive a fee from the Company.

B.3 Risk Management System

The Company's Risk Management System:

- sets out the level of risk acceptable by the Company (Risk Appetite and risk tolerance);
- identifies the risks which represent a threat to the achievement of its strategic objectives;
- identifies, defines and regularly measures key risk indicators enabling an efficient monitoring of risks;
- defines the appropriate actions to reduce the Company's risk exposure;
- ensures the risk management framework is implemented in day-to-day business processes; and
- regularly reviews controls and mitigation actions to ensure that they remain relevant and effective.

The overriding goal of the Company's risk management strategy is to reduce, as much as possible, the Company's risk exposure as a means of minimizing the impact of unexpected events, in order to increase the likelihood of achieving the Company's strategic and business objectives.

The key risk categories for which the Company has set up specific control and monitoring mechanisms are:

- Underwriting/Reserving
- Asset Liability Management ("ALM")
- Investment
- Liquidity and concentration
- Operational
- Reinsurance and other risk mitigation techniques
- Strategic Risk

In order to achieve these objectives, the Risk Management System of the Company has been clearly documented and specified through risk management policies for each key risk category.

The Risk Management Function has also established a Risk Register and a Risk Appetite Framework that are reviewed and approved by the Board on an annual basis. The Risk Register reflects for each identified risk the inherent and residual exposure and corresponding mitigation or hedging actions as well as related monitoring and maintenance actions to be undertaken. The Risk Appetite sets out the target amount of risk that the Company is prepared to accept in order to achieve its strategic objectives and sets out the tolerances for all risk categories in order to ensure a cautious

management of the operations while staying aligned with the Boards' expectations.

In addition to these policies, an outsourcing policy defining the key rules and criteria to be followed by each service provider has been determined.

Each year and on an ad-hoc basis, if circumstances materially change, Seamair prepares an Own Risk and Solvency Assessment ("ORSA") report. The objective of the ORSA process is to enable the Board to assess its capital adequacy in the light of its assessments of its risks and the potential impacts of its risk environment and enable it to make appropriate strategic decisions. The Board requires that the ORSA process produces meaningful reports on the adequacy of the Company's capital and risk sensitivities that can be used in shaping strategy and risk appetite. The approach may be summarized as follows:

Define the Stress Scenarios

Stress testing and scenario analysis are used to assess whether the available and future capital are sufficient in expected and stressed situations.

As part of ORSA process the Board selected the appropriate stress and scenario tests that they deemed were appropriate for the Company.

Stress the Financial Plan

Stress test scenarios are embedded into the projected financial plan under Solvency II. Related SCR/MCR and solvency ratios are then calculated for each year, resulting in the Stressed Financial Plan and the solvency impact of adverse loss scenarios. The tasks of this process are conducted by the Actuarial Function and validated by the Risk Management Function.

Assess prospective solvency needs on the basis of the Stressed Financial Plan

The Risk Management Function identifies potential additional mitigation actions to reduce the potential impact of the Stress Scenarios. Any remaining solvency gap will be covered through a relevant capital plan, i.e. defining the measures to restore the Company's solvency margin should the assumed scenarios occur.

Produce the ORSA Report

The ORSA report brings clarity over projected risk assessments and solvency needs to 3 different stakeholders

Stakeholder	Expectation	ORSA Report
Board of Directors	Matching projected risks vs the Risk Appetite framework.	Provides a clear and prospective understanding of critical risk exposures and their relationship with Risk Appetite boundaries.

Shareholders	Detailed and prospective understanding about the risk of bankruptcy and potential need for future additional capital.	Provides a plan for capital needs on the time horizon of the financial planning.
Supervisory Authority	Detailed and prospective understanding of potential ORSA deviations compared to the SCR under Pillar I.	Gathers information about: projected Solvency ratios; - explanations about deviations due to specific critical risks exposures.

The ORSA process described above ensures that ORSA is integrated in the decision-making and business planning process. Furthermore, monitoring procedures as set out in the risk management policies ensures that risk exposures are measured on a regular basis triggering exception reports for the Board.

In line with CBI requirements the Head of Actuarial Function provides an actuarial Opinion to the Board of Directors in respect of the ORSA at the same time that the results of the ORSA process are presented to the Board.

Assessments to date indicate that, under the scenarios presented by management to the Board, the Company is adequately capitalised.

The capital risk appetite for Seamair is to sustain its capital at a level sufficient to meet the Regulatory Solvency Capital Requirement at all times. It is not the intent to maintain a significant capital buffer in the Seamair balance sheet.

Celgene would always seek to be in a position to take prompt corrective action to replenish capital to an appropriate level in Seamair so that SCR compliance can be demonstrated. Celgene is expected to continue to have ample capacity to provide this support to Seamair. The ORSA process is reviewed and approved annually by the board.

B.4 Internal Control System

The Internal Control System embedded in the Company's operations is a mix of processes undertaken by all stakeholders within the Company to provide reasonable assurance that the strategic objectives will be achieved.

In order to achieve the aforementioned objectives, the Internal Control framework of the Company is structured around five complementary components.

Component	Contents
1) Control environment	A strong "risk and control" culture is embedded within the Company's operations through the continuous oversight of the Board of Directors and the communication to all internal stakeholders of all governance and risk principles through the present manual.

2) Risk assessment	Procedures and policies are detailed and formalized in order to disclose the way of identifying, managing, controlling, mitigating and reporting issues relating to each risk category.
3) Reporting channels	Clear and structured reporting processes are in place enabling the Board of Directors to have access to relevant, complete, reliable, correct and timely communication related to internal as well as external events.
4) Monitoring process	The appropriate escalation of significant issues to the Board of Directors, the ongoing involvement of all internal stakeholders as well as the Internal Audit process enables the Company to continuously monitor and adapt when necessary its Internal Control System.
5) Control activities	The Company has developed a comprehensive set of preventive, detective or corrective control actions embedded in its daily operations.

Detailed Processes and Embedded Control Activities

In order to set out how the Internal Control System is implemented the Company's processes and related control activities are documented, monitored and reviewed on a regular basis.

These items are approved by the Board of Directors and evaluated by the Internal Audit Function. They are reviewed as often as necessary but at least once a year.

Tasks and actions are shared between the key functions of the Company and clarify related roles, responsibilities and embedded control activities.

Compliance Function

The Compliance Function is an integral component of the Company’s governance system. The Company has a dedicated Head of Compliance reporting to the Board of Directors, supported by a Compliance Officer who coordinates the activities of the Compliance Function.

The responsibilities of the Compliance Function include:

- utilisation of compliance management practices that contribute to the use of sound, responsible and sustainable business practices by the Company;
- presentation of an annual compliance plan to the Board of Directors, outlining specific areas which it will focus on during a particular year;
- promotion of a culture of compliance within the organisation;
- maintenance of a comprehensive compliance risk management control and reporting system in conjunction with the Risk Management Function to assist in managing the compliance risk faced by the Company;
- consideration of possible future changes in the legal environment and their potential effect on the Company as well as providing regular compliance and regulatory updates to the Board of Directors;

- identification and communication throughout the Company the laws, regulations and codes of conduct to which the Company is subject and assisting to embed compliance with these in the way the Company does business; and
- investigation and follow up of compliance breaches, ensuring timely reporting to the Board and in certain circumstances to outside bodies such as the CBI.

B.5 Internal Audit Function

Purpose & Objectives

The purpose of the Internal Audit Function is to serve as an independent Function that objectively evaluates and recommends improvements to the Company's Internal Control System by facilitating an objective and independent assessment.

It assists the Company accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of the risk management, control, and governance processes employed by the Company.

The Board is keen to develop effective policies and practices and take appropriate corrective action in response to weaknesses identified by internal and external auditors.

Independence and Impartiality

The Company's Internal Audit Function must be independent of the activities audited and must also be independent from the operational Functions and the Board of Directors.

The Internal Audit Function is free to report its findings and appraisals and to disclose them to the Board as required. This principle of independence of the Internal Audit Function entails that the Internal Audit Function operates under the direct control of the Board of the Company.

B.6 Actuarial Function

The Actuarial Function is carried out by the Aon Actuarial & Analytics team and the roles and responsibilities of the Actuarial Function include:

- Coordination of the calculation of technical provisions;
- Identification of any inconsistencies with the requirements set out in Articles 76 to 85 of the Solvency II Directive for the calculation of technical provisions and propose corrections as appropriate;
- Explanation of any material effect of change of data, methodologies or assumptions between valuation dates on the amount of technical provisions if already calculated on a Solvency II basis;
- Assessment of the consistency of the internal and external data used in the calculation of technical provisions against the data quality standards as set out in Article 82 of the Solvency II Directive. Where relevant, the Actuarial Function should provide recommendations on internal procedures to improve data quality so as to ensure that the undertaking is in a position to comply with the related Solvency II requirements when implemented;
- Consideration of the interrelations between the Underwriting Policy, reinsurance arrangements and technical provisions when providing its opinion;

- Providing a written report at least annually to the Board of Director's, the reporting should document all material tasks that have been undertaken by the Actuarial Function, and include:
    i. Deficiencies and giving recommendations as to how such deficiencies could be remedied.
    ii. Technical Provisions Coordination of calculation
    iii. Methodologies & assumptions
    iv. Data sufficiency & quality
    v. Experience analysis
    vi. Report to the Board on reliability & adequacy
    vii. Opinion on Underwriting policy
    viii. Opinion on Reinsurance arrangements

The Actuarial Function report should include any deficiencies identified and give recommendations as to how such deficiencies could be remedied.

- Contributing to the effective implementation of the Risk Management System in particular:
    i. with regard to risk modelling underlying the calculation of the Solvency Capital Requirement (SCR) and MCR; and
    ii. contributing to the ORSA process.

- Thinking critically and organize the execution of actuarial approaches
- Providing an Actuarial Opinion to the Board of Directors in respect of the ORSA.

Responsibility

The person in charge of the Actuarial Function shall meet all the following criteria:

- Be a duly qualified actuary;
- have experience of more than five years in the field of insurance and / or reinsurance.

The Head of Actuarial Function is a pre-approved controlled function (PCF) under the Central Bank Reform Act 2010 (Sections 20 and 22) Regulations 2011.

The Head of Actuarial Function reports to the Board on an annual basis.

B.7 Outsourcing

The objectives of Seamair's Outsourcing Policy are to ensure that the outsourcing of critical or important operational functions or activities does not lead to:

- Reduction in the Board's, and where applicable a relevant sub committee's responsibility for, or influence over key Functions of the Company;
- Material impairment of the quality of the Company's System of Governance;
- Any impairment of the Company's ability to meet its regulatory requirements;
- Non-adherence to the Company's approved policies and procedures;
- Undue increases in operational risk or cost;
- Material impairment of the Company's ability to fulfil its obligations to stakeholders, nor impede effective supervision by regulators;

- Conflicts of Interest;
- Breach of the Company's data protection obligations.

All Functions and activities of the Company are eligible to be outsourced provided that each of the criteria detailed above are satisfied in each instance. Sub-outsourcing is allowable only in exceptional circumstances, on the condition that the sub-outsourced service provider satisfies the above criteria and subject to approval from the Board of Directors.

The Board is responsible for the approval of and termination of all outsourcing arrangements of critical or important Functions or activities. Critical or important Functions or activities include key Functions of the Company's System of Governance and all Functions within the Company that are fundamental to carry out its core business.

The Board must decide whether arrangements with third parties are deemed to fall within the scope of this outsourcing policy. The provision of services which do not form part of the Company's core activities need not be included within the scope of this policy.

The Board is responsible for ensuring notification to the supervisory authorities is made in a timely manner prior to the outsourcing of critical or important Functions or activities, and thereafter where there have been material developments in relation to the service provider.

The Board is responsible for reviewing the performance of outsourced service providers against agreed Service Level Agreements (SLA). The Company's outsourcing arrangements are subject to an annual review and the findings of this report are reviewed by the Board.

The Board is responsible for assessing the risks associated with the outsourcing of critical or important Functions or activities.

The following critical or important functions / activities are outsourced:

Critical or important function	Outsourced Service Provider	Jurisdiction
Underwriting and claims administration	Aon Insurance Managers (Dublin) Limited (AIMD)	Ireland
Finance and accounting	AIMD	Ireland
Compliance Function	AIMD	Ireland
Risk Management Function	AIMD	Ireland
Actuarial Function	Aon Global Risk Consulting	Ireland
Internal Audit Function	Celgene Director and Aon Commercial Services Ireland Limited	Switzerland and Ireland

B.9 Any Other Information

The Board is satisfied, based on its assessment of the frameworks which have been established and are in use, that the Company's system of governance is appropriate and adequate for the nature, scale and complexity of the risks inherent in its business operations.

There are no other material items to report in this section.

C. RISK PROFILE

The Risk Appetite Framework adopted by the Board sets out the level of risk that the Company is prepared to accept in the pursuit of its strategic objectives. It sets out:

- the Company's overall philosophy to risk taking and the expectations of shareholders;
- the Company's tolerance to loss of capital, profit volatility and other specified measures; and
- the risk limits that are acceptable in terms of exposures to different types of risk.

The Company's Risk Register combines operational and risk management processes to deliver a descriptive analysis of material risks threatening at least one of the Company's strategic objectives.

The Board's annual ORSA process is based on the company's current and expected risk profile over the business planning period and supports the Board in achieving its strategic objectives by taking a structured and combined approach of strategy, risk management and capital management.

C.1 Underwriting Risk

The Company underwrites contracts that transfer insurance risk. The risk under any insurance contract is the possibility that the insured event occurs and the uncertainty that the Company will have sufficient assets to satisfy the amounts payable under the contract. The Company seeks to ensure that it collects sufficient premium income to meet the cost of potential claims over time, but the uncertainty surrounding the severity and frequency of claims can lead to significant variation in the Company's performance in the short term. Whilst considerable judgment is involved, the directors ensure that suitable processes are in place to ensure the reliability, sufficiency and adequacy of both the statistical and accounting data to be considered in the loss reserve estimation and recording process and to detail the Company's approach to the calculation of technical provisions.

As the Company is a captive insurer, it is effectively insuring the risks of one customer, its parent group, and thus is exposed to risk concentration. However, diversification is achieved through the varying geographical locations of the underlying risks.

The principal assumptions underlying the Company's estimation of liabilities is that the Company's future claims development will follow a similar pattern to past claims development experience. Additional qualitative judgements are used to assess the extent to which past trends may not apply in the future, for example, isolated large claim occurrences, economic conditions, internal factors such as portfolio mix, policy conditions and claims handling procedures. Judgement is further used to assess the extent to which external factors, such as judicial decisions and government legislation affect the estimates, especially taking account of the longer-term nature of the risks which the Company underwrites.

The Company manages these risks through its underwriting strategy of arranging for an external qualified actuary to review pricing and reserve adequacy of the Company on an annual basis, the settling of appropriate policy limits and having adequate reinsurance arrangements in place. The Company also monitors emerging issues and factors in their potential impact on the Company's pricing and claims reserving.

The Company takes all reasonable steps to ensure that it has appropriate information regarding its underwriting exposures.

Annual support and certification is provided by the Actuarial Function.

C.2 Market Risk

The risk of future changes in market prices, which would result in devaluation of investable assets, may result from several factors, including, but not limited to, value, liquidity, duration, composition, interest rates, foreign exchange rates and market fluctuations. The diversity in its investment portfolio reduces the exposure to market fluctuations and matches the profile of the assets backing liabilities to those liabilities. Furthermore, the Managers monitor the investment portfolio on a regular basis and bring any material movements to the Board's attention.

Seamair has an investment strategy in place in line with its Risk Appetite Framework and the related 'Prudent Person' regulatory requirements. The Company endeavours to:

- prudently invest with consideration of the prevailing financial market environment;
- ensure the Company invests appropriately so as not to result in the Company failing to meet its Solvency Capital Requirements;
- ensure that the Company holds assets of sufficient value and liquidity to meet all liabilities as they become due;
- maximise investment return within the levels of risk as defined by the Company's Risk Appetite;
- ensure compliance with the Liquidity Strategy and Policy;
- ensure compliance with the Asset-Liability Management Strategy and Policy; and
- ensure effective risk management of investments at all times, with due consideration of the risks associated with investments and procedures to monitor, manage and report these risks in a timely manner as part of the Company's overall Risk Management System.

Interest rate risk arises on the return on the Company's investments including cash and deposits with credit institutions.

The Company is exposed to currency risk to the extent its assets and liabilities are denominated in a currency different from its functional currency. The Company seeks to mitigate currency risk by matching the assets and liabilities which arise in different currencies. The majority of the Company's assets are held in reporting currency with a small amount held in EURO to cover general and administrative expenses. In addition to this, the ultimate settlement of loss reserves is in the Company's reporting currency and as such its exposure to foreign exchange risk is minimal.

C.3 Credit Risk

Credit risk is the risk that one party to a financial instrument or financial arrangement will fail to discharge an obligation and cause the other party to incur a financial loss. The assets that are exposed to credit risk are:

- Cash and cash equivalents;
- Investments and deposits with credit institutions; and
- Deposits with group undertakings.

The Company has an exposure to credit risk in relation to its deposits with credit institutions and loan with Celgene. To manage these risks; deposits are made, in accordance with established policy, with credit institutions that are highly rated. The rating of Celgene is also monitored on a regular basis and maximum counterparty exposure limits are set for the credit institutions.

C.4 Liquidity Risk

The Company is exposed, if proceeds from financial assets are not sufficient to fund obligations arising from its insurance contracts. The Company can be exposed to daily calls on its available investment assets, principally from insurance claims. Liquidity risk is the risk that cash may not be available to pay obligations when they are due without incurring an unreasonable cost. The Company's exposure to liquidity risk is considered to be low since it maintains a high level of liquid assets to meet its liabilities and the intercompany loan is repayable at the request of the Company. The Company is also exposed to liquidity risk on the expected profit included in future premiums ("EPIFP") however it amounts to nil as at 31 December 2018 (2017: nil) because of no Bound but Not Incepted contracts and nil unpaid premium on the balance sheet.

C.5 Operational Risk

Operational risk is the risk of loss arising from system failure, human error, fraud, or external events. When controls fail to perform, operational risk can cause damage to reputation, have legal or regulatory implications, or can lead to financial loss. The Company has a rigorous control framework and monitoring process in place to manage operational risk. Controls include effective segregation of duties, access controls, authorisation and reconciliation procedures, staff education, and assessment processes. Outsourced activities are monitored and managed in the same manner in line with the Outsourcing policy.

The Company cannot expect to eliminate all operational risk, but by initiating a rigorous control framework and by monitoring and responding to potential risks, the Company is able to manage the risk.

Seamair maintains a regulatory dialogue with CBI to mitigate the risk of any potential sanction or compliance breach as well as using expert, industry leading, service providers, namely Aon to provide its outsourced functions which help avoid any material error or delay. In order to ensure the quality of the outsourced functions is as high as possible; Seamair puts in place service level agreements and fee penalties for non-performance as well as regularly reviewing the outsourced service providers.

C.6 Other Material Risk

Strategic Risk

Strategic risk is the risk of loss arising from adverse business decisions, improper implementation of decisions, or lack of responsiveness to industry changes i.e. the risk associated with implementing the wrong strategy or failing to correctly implement the chosen strategy.

The control and monitoring actions/principles underlying the strategic risk management of the Company are:

- Review at least annually the appropriateness of the high level overall objectives for the Company; the major risks facing the Company; the Risk Appetite for each of these major risks identified.
- Ensure the Company Strategy is implemented correctly including approval, review and, monitoring of agreed Key Performance Indicators for the Company.
- Ensure all plans are regularly reviewed to ensure that Risk Tolerances are not exceeded individually or in total.

Sensitivity Risk

The Actuarial Function assesses annually the sensitivity of its estimate of the Company's unpaid claim liabilities of varying the key assumptions underlying its analysis. Given the nature of the Company's exposures, the key assumptions underlying the actuarial analysis are subject to a range of reasonable interpretations.

No other material risks have been identified.

D. VALUATION FOR SOLVENCY PURPOSES

D.1 Assets

Seamair prepares its financial statements on a going concern basis in compliance with FRS 102 and FRS 103 issued by the Financial Reporting Council and promulgated by the Institute of Chartered Accountants Ireland, being applicable UK and Irish GAAP accounting standards, and in accordance with the provisions of the Companies Act 2014 and the European Union (Insurance undertakings: Financial Statements Regulations 2015).

There are a number of differences between the financial statement basis and the Solvency II valuation rules. Most of these differences are driven by the requirement for all assets and liabilities to be valued on a market consistent fair value basis under Solvency II.

At the end of the current reporting period Seamair has total assets valued at US$80.2m (2017: US$70.9m) for solvency purposes. The increase in assets is primarily driven by a net increase in investments as a result of the 2018 premium cashflows. This total comprises the following categories of assets:

	2018			2017		
	Solvency II Value	**Statutory Accounts Value**	**Difference**	**Solvency II Value**	**Statutory Accounts Value**	**Difference**
ASSETS	**US$**	**US$**	**US$**	**US$**	**US$**	**US$**
Deferred acquisition costs (1)	-	567,407	(567,407)	-	1,071,540	(1,071,540)
Deferred tax asset (2)	92,167	-	92,167	-	-	-
Deposits other than cash equivalents (3)	47,211,499	46,618,231	593,268	70,122,034	69,843,783	278,251
Other loans and mortgages (3)	32,419,589	32,000,000	419,589	-	-	-
Reinsurance recoverables (4)	-	-	-	175,279	-	175,279
Insurance and intermediaries receivables (5)	21,826	34,250	(12,424)	41,119	41,399	(280)
Receivables trade not insurance (3)	-	1,012,857	(1,012,857)	22,559	300,810	(278,251)
Cash and cash equivalents (6)	457,827	457,827	-	570,358	570,358	-
Any other assets, not elsewhere shown (7)	-	13,493	(13,493)	15,339	15,477	(138)
Total Assets	**80,202,908**	**80,704,065**	**(501,157)**	**70,946,688**	**71,843,367**	**(896,679)**

(1) Deferred acquisition costs relate to those cedant fronting fees that are deferred over the remaining policy period as at 31 December 2018. Such costs are not recognised for Solvency II purposes.

(2) The conversion from a statutory financial statements basis to a Solvency II valuation basis results in a loss being created therefore the corresponding tax impact must be reflected. For Seamair this results in a deferred tax asset as the loss recognised can be used to offset future taxable profits and hence reduce future tax obligations. The loss recognised can be used to offset future taxable profits and hence reduce future tax obligations.

(3) These amounts represent an intercompany loan and short-term deposits with an original maturity of one year or less. These assets are stated at market value for both solvency and financial statement purposes, the only difference being the inclusion of accrued interest in the above balances. Accrued interest is disclosed as a separate line item in the financial statements.

(4) Reinsurance recoverables are dealt with in Section D.2 below as part of the explanation on the valuation of technical provisions.

(5) Insurance and intermediary receivables comprise prepaid IPT amounts and an escrow fund in the amount of US$10k, the majority of which have been included in the calculation of technical provisions discussed in Section D.2.

(6) Cash and cash equivalents comprise cash at banks. Carrying amounts approximate fair value due to the liquid nature of the assets. There are no valuation adjustments for solvency purposes.

(7) Any other assets, not elsewhere shown comprise prepaid expenses have been included in the calculation of technical provisions discussed in Section D.2.

Information on how the Company invests its assets and manages risk in this area, including how it achieves compliance with the 'prudent person principle', is set out in Sections C.2 – C.4 above. Operational risks relating to the Company's assets are managed according to the control framework described in Section B4 above.

D.2 Solvency II Technical Provisions

Provision is made for notified losses on all underwriting years. The Company currently does not purchase reinsurance protection. The Company has regard to the gross loss positions as indicated by the claim circumstances reported to date and loss projections carried out under the direction of the Head of Actuarial Function using actuarial techniques.

Reserves for insurance contract liabilities and reinsurance assets are based upon management's best estimate of the ultimate liabilities and are determined with the assistance of, and based on, the results of the analysis performed by the Actuarial Function. The reserves include estimates for both case reserves and losses incurred but not reported ("IBNR").

The Solvency II Technical Provision is comprised of a Best Estimate of Liabilities ("BEL") and a Risk Margin ("RM"). At 31 December 2018, the technical provisions were:

Year ended 31/12/2018	**Medical expense insurance**	**Workers' comp insurance**	**Motor vehicle liability insurance**	**Other motor insurance**	**Marine, aviation and transport insurance**	**Fire and other damage to property insurance**	**General liability insurance**	**Total**
Gross BEL	158,396	561,486	1,897,706	238,278	385,913	702,827	11,848,361	15,792,967
Risk Margin	39,937	147,704	520,361	14,045	74,162	87,016	1,731,471	2,614,696
Technical Provisions	198,333	709,190	2,418,067	252,323	460,075	789,843	13,579,832	18,407,663

Year ended 31/12/2017	Medical expense insurance	Workers' comp insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Total
Gross BEL	77,614	499,997	1,478,362	409,180	397,009	356,688	11,793,133	15,011,983
Risk Margin	14,500	104,784	310,866	32,964	62,346	51,898	1,367,667	1,945,025
Technical Provisions	92,114	604,781	1,789,228	442,144	459,355	408,586	13,160,800	16,957,008

Main Assumptions

Loss Ratios

In order to derive the best estimate cash flows for claims arising from unearned business (both incepted and unincepted), a gross loss ratio has been applied to the corresponding premium exposure per line of business.

For many lines of business there have been very few claims historically, and for some no claims have ever been incurred. For the lines where this is the case (Products Recall, Marine, Cyber, Executive Risk, and Professional Liability), a loss ratio of 100% has been used. This is consistent with the prior loss ratios used in the statutory reserving. It has been assumed that a loading for Events Not In Data ('ENID') and expenses is already included in this value.

For PDBI and Medical Expense the ultimate loss ratio has been taken from the statutory reserving for the most recent year as the best estimate loss ratio.

For Auto Liability, and Workers' Compensation, the prior ultimate in dollar terms has been used from the statutory reserving, uplifted slightly to allow for six months of inflation at 3% and changes in exposure (vehicle numbers or employee numbers). For Auto Physical Damage an average of ultimate claims cost in historical policy years has been used and inflation has been applied on exposure adjustments.

For GL, consistent with last year, a market loss ratio based on how the premium has increased historically when the limit has increased has been utilised.

Expenses

The level of expenses incurred annually by Seamair was calculated as per the statutory accounts. The same percentage adjustment was made for Solvency II expenses as for ULAE. The mean payment term of the claims provision has been calculated as 4.6 years the cost of this annual expense has been considered for the duration of the mean payment term. An annual inflation rate of 3% has been factored into an expense estimate of US$329k (2017: US$334k).

ENIDs

A reasonable benchmark for ENID was considered to be 2% to 5%. A 2.5% allowance for ENID has therefore been added to the gross claim provisions across all lines of business. This has led to an increase of US$205k (2017: US$380k) in the gross claim provisions.

Discounting

Claims payments in the claims and premium provisions have been projected at annual intervals using benchmark payment patterns. It has been assumed that expenses are paid consistently with claims. These cash flows have subsequently been discounted to the valuation date assuming future payments are made mid-year.

Best Estimate of Liabilities

The Solvency II Technical Provision is comprised of a Best Estimate of Liabilities ("BEL") and a Risk Margin ("RM").

BEL

The Solvency II BEL is comprised of a provision for claims outstanding ("PCO") and a premium provision ("PP"). The PCO represents the provision for the unpaid liabilities on claims that have been incurred as of the valuation date. The PP represents the expected profit underlying the unearned portion of policies that have already incepted and any policies that have been bound but not incepted ("BBNI"). The PCO is derived from actuarial estimate of Seamair's FRS unpaid claim liabilities. The adjustment of FRS estimate of unpaid claim liabilities to a Solvency II basis requires that FRS unpaid claim liabilities are discounted to a present value basis. The actuary utilizes the basic RFR (risk-free rate) curves with no volatility adjustment as of 31 December 2018 as published by EIOPA to discount the cash flows underlying the PCO. These interest rates are utilized to discount all cash flows underlying the calculation of the Solvency II TPs. A provision for expenses related to the runoff of these liabilities is then added, as required by Solvency II, as the FRS estimate of unpaid claim liabilities does not include a provision for the expenses that will be incurred in running off the liabilities.

The methodology adopted implicitly assumes that Seamair will continue to write business into the future and that a portion of the expenses in future years will be attributable to new business, consistent with the required derivation of the expense reserve as per the current Solvency II regulations. The BEL is calculated as the sum of the PCO and the PP.

Risk Margin

The Solvency II risk margin is intended to represent an amount that Seamair would be required to pay, in excess of the Best Estimate of the Liabilities, for a third party to assume the risk of running of the existing liabilities. The actuarial calculation of the Solvency II risk margin is consistent with the Solvency II regulations, which applies a 6% cost of capital to the amount of capital required at the beginning of each year to support the runoff of the insurance obligations.

Areas of uncertainty

Low claim volumes

A key source of uncertainty for Seamair is the low claim volumes. The majority of classes have not experienced any claims on which to base reserve estimates and are characterised by infrequent but potentially severe claims. The nature of the products and turnover of Celgene Corporation, and the

inwards limits accepted by Seamair, particularly on the General Liability programme, contribute to the volatility of claims.

Prior year expected losses

Due to the lack of data on which to base reserve estimates there is reliance placed on the appropriateness of the premiums for many of the classes. The premiums are set based on market rates and therefore include sufficient allowances for claims deterioration. The Actuarial Function is reliant on the initial expected loss ratios for classes where the ultimates are estimated using the Bornhuetter-Ferguson method.

In calculating its technical provisions on a Solvency II basis, Seamair has not applied any of the following items:

- matching adjustment referred to in Article 77b of Directive 2009/138/EC;
- volatility adjustment referred to in Article 77d of Directive 2009/138/EC;
- transitional risk-free interest rate-term structure referred to Article 308c of Directive 2009/138/EC; and
- transitional deduction referred to in Article 308d of Directive 2009/138/EC.

D.3 Other Liabilities

Aside from technical provisions, the valuation of which is detailed above in Section D.2, Seamair has 1 other principal class of liability which includes corporation tax payable and accrued expenses. Aside from discount there are no valuation adjustments for solvency purposes.

D.4 Alternative Methods for Valuation

The Company does not use any alternative methods for valuation.

D.5 Any Other Information

There is no other information to report.

E. CAPITAL MANAGEMENT

E.1 Own Funds

The Company has put in place a Capital Management policy to ensure that 'Own Fund' items, both at issue and subsequently, meet the requirements of the Solvency II capital regime. The objectives of the policy are to ensure that on an on-going basis the Company has:

- own fund items available to meet its capital requirements; and
- developed processes to ensure the appropriateness of its own fund items.

As part of the annual review of the medium-term capital plan, the Company reviews the level, composition and classification of own fund items to ensure they continue to meet its own solvency needs, and its regulatory obligations in respect of Solvency Capital Requirement ("SCR") and Minimum Capital Requirement ("MCR"). A forward-looking time horizon is used for business planning purposes and any anticipated changes to the Company's business and risk profile are factored into the ORSA process to assess the solvency and capital needs over the business planning period. It is intended that the Company's capital needs will be managed out of its existing pool of own funds and the efficient management of the Company's insurance business. Should additional funds be required outside of that, they will be advanced by the shareholder.

The Company's own funds consist of the following items:

- Issued Share Capital; and
- Retained Earnings.

Any change to the share capital requires the approval of the Shareholder and the Board. Retained earnings are adjusted on a quarterly basis to take account of the profits/losses earned in the period together with any Solvency II valuation adjustments. The payment of dividends is considered on an annual basis by the Board as part of its medium-term capital assessment. Potential dividends will be considered as part of the Company's ORSA process to ensure that the Company will continue to meet its solvency needs over the business planning period. Any other qualifying own fund item requires the review and approval of the Board. In such instances, the Board must ensure that the terms and conditions of any own fund item are clear and unambiguous in relation to the capital classification.

Own fund items at the end of reporting period and the prior year comparative period are as follows:

	2018 **USD**	**2017** **USD**
Ordinary paid up share capital	1,050,000	1,050,000
Reconciliation reserve adjusted [1]	60,151,365	52,398,080
Total Tier 1 capital	61,191,365	53,448,080
Net deferred tax asset – Tier 3 capital	92,167	-
Total basic own funds	61,283,532	53,448,080

[1] The reconciliation reserve is adjusted by the claims escrow fund of US$10k which is effectively a ring-fenced fund and should be netted off against available capital.

The movement in basic own funds during the reporting period reflects the profits realised by the Company due to the 2018 premium cashflows and favourable claims performance in the period as adjusted for the valuation of net technical provisions on a market consistent fair value basis under Solvency II. The reconciliation reserve represents the Company's retained profits as adjusted for Solvency II valuation principles. The adjustments which arise in the application of these principles are shown in the equity reconciliation below.

At the end of the current reporting period eligible own funds available to meet the Company's SCR is US$61.3m (2017: US$53.4m) and MCR is US$61.2m (2017: US$53.4m), comprised of Tier 1 capital of US$61.2m and Tier 3 capital of US$0.1m (deferred tax asset).

The equity position as shown in the Company's 2018 and 2017 year-end financial statements can be reconciled to the basic own funds balance under Solvency II as follows:

Reconciliation of Basic Own Funds to Equity in the financial statements

	31/12/2017 US$'000	31/12/2017 US$'000
Total Equity in the financial statements	61,939	50,678
Deduct items not recognised in the financial statements:		
Reinsurance BEL	-	(175)
Risk Margin	2,615	1,945
Difference between TPs and BEL	(2,464)	(6,018)
Deferred Tax	(92)	397
Discounting of assets and liabilities	(20)	-
Add items not recognised in Solvency II Balance Sheet:		
Deferred acquisition costs	(567)	(1,071)
SII value of excess of assets over liabilities	61,293	53,458

The Company's own funds are not subject to transitional arrangements and the Company has no ancillary own funds. No deductions are applied to own funds and there are no material restrictions affecting their availability and transferability.

The company assesses material risks that may threaten the accomplishment of the Company's strategic objectives or might have a substantial impact on the available qualifying own funds. These risks could result from either internal or external events.

Management has identified Underwriting Risk, Reserving Risk and Market Risk as the material risks to which the Company is exposed. Management has investigated the magnitude of each of these risks as well as sought to determine any potential correlations that may exist within, or between, these risk categories based on review of historical experience.

In relation to Investment Risk, a clear strategy has been developed to manage risk in a manner which limits exposure to investment volatility for those assets matching insured liabilities. The majority of these assets are invested in fixed term deposits ranging in maturities less than one year.

E.2 Solvency Capital Requirement & Minimum Capital Requirement

Seamair's SCR as of 31 December 2018 totals US$19.5m (2017: US$17.8m).

The SCR is intended to correspond to the capital the Company needs to hold in order to limit the probability of ruin, in the following 12 months, to 0.5%, i.e. ruin would occur less than once in every 200 years. The SCR calculated at the end of the current reporting period, relates to the capital required to support the business over the prospective 12 months; covering both existing liabilities and business written during 2018/2019. Based on the Company's eligible own funds of US$61.3m (2017: US$53.4m), the Company has a solvency ratio at 31 December 2018 of 315% (2017: 299%).

The SCR has been calculated using the standard formula and without the application of any undertaking specific parameters.

The split of SCR by risk modules is shown below, together with the prior year comparative:

Risk Charge	31 December 2018	31 December 2017	Movement
Non-Life Underwriting Risk	16,410	15,198	1,212
Health Underwriting Risk	408	181	227
Counterparty Default Risk	68	86	(18)
Market Risk	10,652	9,567	1,084
Operational Risk	474	450	23
Tax Adjustments	(2,781)	(2,550)	(231)
Diversification Benefit	(5,767)	(5,086)	(681)
SCR	**19,464**	**17,847**	**1,617**
Available Capital	61,284	53,448	7,835
Surplus / (Deficit)	*41,819*	*35,601*	*6,218*
Solvency Ratio	**315%**	**299%**	**15%**

The primary drivers of the overall increase of US$1.6m in Seamair's SCR arise from the Market Risk and the Non-Life Underwriting risk capital charges:

- Non-Life Underwriting Risk:
  Catastrophe risk has increased due to an increase in the aggregate limit for Workers' Compensation and Auto, which is no longer expected to be breached. This is offset by a decrease in the lapse risk driven by the higher loss ratios for the GL class. This results in an increase in the Non-life underwriting risk charge of US$1.2m.

- Market Risk:
  Seamair has made US$7.8m (2017: US$10.2m) of profit on a Solvency II basis over the past year. This has increased the asset holding, giving rise to a greater concentration risk charge. Seamair also now holds US$32.4m in intercompany loan including

accrued interest with Celgene which is rated BBB. This has given rise to a greater concentration risk charge.

- Capital:
  The available capital has increased considerably due to an increase in retained profits.

The MCR for Seamair is calculated in accordance with the standard formula. Setting the MCR involves three steps:

- Firstly, a factor-based calculation is applied using premiums and reserves as the drivers.
- The value of this calculation is either capped such that the value of the MCR is 30% of the value of the SCR.
- Finally, the Absolute Minimum Capital Requirement ("AMCR") is applied. This is a monetary floor on the value of the MCR. For non-life insurance captives that write classes 10 and 15 this is currently set at US$4.2m (equivalent to US$3.7m (2017: US$4.5m), converted using 31 December 2018 exchange rates.)

Seamair's MCR is higher than the AMCR.

E.3 Use of duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement

There was no use of duration-based equity risk sub model in the calculation of the SCR.

E.4 Differences between the standard formula and any internal model

Seamair used the Standard Model in determining the SCR and MCR and did not rely on any internal model.

E.5 Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency II Capital Requirement

There are no issues with non-compliance with the MCR and SCR.

E.6 Any Other Information

There is no other information to report.

Note: Tables within this report contain minor rounding differences in certain instances due to amounts being displayed as whole numbers or in thousands while the source workings underlying the annual reporting templates are calculated to two decimal places. These differences are immaterial.

ANNEX I – QUANTITATIVE REPORTING TEMPLATES

The following reporting templates are appended to this report:

S.02.01.02 – Balance sheet*

S.05.01.02 – Premiums, claims and expenses

S.05.02.01 - Premiums, claims and expenses by country

S.17.01.02 – Non-Life technical provisions*

S.19.01.21 – Claim development triangles*

S23.01.01 – Own funds*

S25.01.21 – SCR using standard formula*

S28.01.01 – MCR*

*templates subject to external audit.

Amounts are in USD'000

Annex I
S.02.01.02
Balance sheet

		Solvency II value
Assets		**C0010**
Intangible assets	**R0030**	
Deferred tax assets	**R0040**	92
Pension benefit surplus	**R0050**	
Property, plant & equipment held for own use	**R0060**	
Investments (other than assets held for index-linked and unit-linked contracts)	**R0070**	47,211
Property (other than for own use)	**R0080**	
Holdings in related undertakings, including participations	**R0090**	
Equities	**R0100**	
Equities - listed	**R0110**	
Equities - unlisted	**R0120**	
Bonds	**R0130**	
Government Bonds	**R0140**	
Corporate Bonds	**R0150**	
Structured notes	**R0160**	
Collateralised securities	**R0170**	
Collective Investments Undertakings	**R0180**	
Derivatives	**R0190**	
Deposits other than cash equivalents	**R0200**	47,211
Other investments	**R0210**	
Assets held for index-linked and unit-linked contracts	**R0220**	
Loans and mortgages	**R0230**	32,420
Loans on policies	**R0240**	
Loans and mortgages to individuals	**R0250**	
Other loans and mortgages	**R0260**	32,420
Reinsurance recoverables from:	**R0270**	
Non-life and health similar to non-life	**R0280**	
Non-life excluding health	**R0290**	
Health similar to non-life	**R0300**	
Life and health similar to life, excluding health and index-linked and unit-linked	**R0310**	
Health similar to life	**R0320**	
Life excluding health and index-linked and unit-linked	**R0330**	
Life index-linked and unit-linked	**R0340**	
Deposits to cedants	**R0350**	
Insurance and intermediaries receivables	**R0360**	22
Reinsurance receivables	**R0370**	
Receivables (trade, not insurance)	**R0380**	
Own shares (held directly)	**R0390**	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	**R0400**	
Cash and cash equivalents	**R0410**	458
Any other assets, not elsewhere shown	**R0420**	
Total assets	**R0500**	80,203

Annex I
S.02.01.02
Balance sheet

		Solvency II value
Liabilities		**C0010**
Technical provisions – non-life	**R0510**	18,408
Technical provisions – non-life (excluding health)	**R0520**	17,500
TP calculated as a whole	**R0530**	
Best Estimate	**R0540**	15,073
Risk margin	**R0550**	2,427
Technical provisions - health (similar to non-life)	**R0560**	908
TP calculated as a whole	**R0570**	
Best Estimate	**R0580**	720
Risk margin	**R0590**	188
Technical provisions - life (excluding index-linked and unit-linked)	**R0600**	
Technical provisions - health (similar to life)	**R0610**	
TP calculated as a whole	**R0620**	
Best Estimate	**R0630**	
Risk margin	**R0640**	
Technical provisions – life (excluding health and index-linked and unit-linked)	**R0650**	
TP calculated as a whole	**R0660**	
Best Estimate	**R0670**	
Risk margin	**R0680**	
Technical provisions – index-linked and unit-linked	**R0690**	
TP calculated as a whole	**R0700**	
Best Estimate	**R0710**	
Risk margin	**R0720**	
Contingent liabilities	**R0740**	
Provisions other than technical provisions	**R0750**	
Pension benefit obligations	**R0760**	
Deposits from reinsurers	**R0770**	
Deferred tax liabilities	**R0780**	
Derivatives	**R0790**	
Debts owed to credit institutions	**R0800**	
Financial liabilities other than debts owed to credit institutions	**R0810**	
Insurance & intermediaries payables	**R0820**	
Reinsurance payables	**R0830**	
Payables (trade, not insurance)	**R0840**	
Subordinated liabilities	**R0850**	
Subordinated liabilities not in BOF	**R0860**	
Subordinated liabilities in BOF	**R0870**	
Any other liabilities, not elsewhere shown	**R0880**	502
Total liabilities	**R0900**	18,910
Excess of assets over liabilities	**R1000**	61,293

Annex I
S.05.01.02
Premiums, claims and expenses by line of business

		Line of Business for: **non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)**								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0010	**C0020**	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**
Premiums written										
Gross - Direct Business	**R0110**	100		500	800	700	200	550	8,288	
Gross - Proportional reinsurance accepted	**R0120**								261	
Gross - Non-proportional reinsurance accepted	**R0130**									
Reinsurers' share	**R0140**									
Net	**R0200**	100		500	800	700	200	550	8,549	
Premiums earned										
Gross - Direct Business	**R0210**	100		464	729	807	200	550	7,955	
Gross - Proportional reinsurance accepted	**R0220**								4,336	
Gross - Non-proportional reinsurance accepted	**R0230**									
Reinsurers' share	**R0240**									
Net	**R0300**	100		464	729	807	200	550	12,291	
Claims incurred										
Gross - Direct Business	**R0310**	-		434	674	610	59	134	317	
Gross - Proportional reinsurance accepted	**R0320**								136	
Gross - Non-proportional reinsurance accepted	**R0330**									
Reinsurers' share	**R0340**									
Net	**R0400**	-		434	674	610	59	134	453	
Changes in other technical provisions										
Gross - Direct Business	**R0410**									
Gross - Proportional reinsurance accepted	**R0420**									
Gross - Non- proportional reinsurance accepted	**R0430**									
Reinsurers'share	**R0440**									
Net	**R0500**									
Expenses incurred	**R0550**	4		43	78	30	7	21	1,472	
Other expenses	**R1200**									
Total expenses	**R1300**									

Annex I
S.05.01.02
Premiums, claims and expenses by line of business

		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
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0100	**C0110**	**C0120**	**C0130**	**C0140**	**C0150**	**C0160**	**C0200**
Premiums written									
Gross - Direct Business	**R0110**								11,138
Gross - Proportional reinsurance accepted	**R0120**								261
Gross - Non-proportional reinsurance accepted	**R0130**								
Reinsurers' share	**R0140**								
Net	**R0200**								11,399
Premiums earned									
Gross - Direct Business	**R0210**								10,805
Gross - Proportional reinsurance accepted	**R0220**								4,336
Gross - Non-proportional reinsurance accepted	**R0230**								
Reinsurers' share	**R0240**								
Net	**R0300**								15,141
Claims incurred									
Gross - Direct Business	**R0310**								2,228
Gross - Proportional reinsurance accepted	**R0320**								136
Gross - Non-proportional reinsurance accepted	**R0330**								
Reinsurers' share	**R0340**								
Net	**R0400**								2,364
Changes in other technical provisions									
Gross - Direct Business	**R0410**								
Gross - Proportional reinsurance accepted	**R0420**								
Gross - Non- proportional reinsurance accepted	**R0430**								
Reinsurers'share	**R0440**								
Net	**R0500**								
Expenses incurred	**R0550**								1,655
Other expenses	**R1200**								
Total expenses	**R1300**								1,655

Annex I
S.05.01.02
Premiums, claims and expenses by line of business

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

Annex I
S.05.02.01
Premiums, claims and expenses by country

		Home Country	Top 5 countries (by amount of gross premiums		Total Top 5 and home country
		C0010	C0020	C0030	C0070
	R0010		US	GB	
		C0080	C0090	C0100	C0140
Premiums written					
Gross - Direct Business	R0110	55	9,723	281	10,059
Gross - Proportional reinsurance accepted	R0120		260		260
Gross - Non-proportional reinsurance accepted	R0130				
Reinsurers' share	R0140				
Net	R0200	55	9,983	281	10,319
Premiums earned					
Gross - Direct Business	R0210	36	5,924	176	6,136
Gross - Proportional reinsurance accepted	R0220		143		143
Gross - Non-proportional reinsurance accepted	R0230				
Reinsurers' share	R0240				
Net	R0300	36	6,067	176	6,279
Claims incurred					
Gross - Direct Business	R0310	2	2,347	8	2,357
Gross - Proportional reinsurance accepted	R0320		7		7
Gross - Non-proportional reinsurance accepted	R0330				
Reinsurers' share	R0340				
Net	R0400	2	2,354	8	2,364
Changes in other technical provisions					
Gross - Direct Business	R0410				
Gross - Proportional reinsurance accepted	R0420				
Gross - Non- proportional reinsurance accepted	R0430				
Reinsurers'share	R0440				
Net	R0500				
Expenses incurred	R0550	9	1,601	45	1,655
Other expenses	R1200				
Total expenses	R1300				1,655

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

Annex I
S.17.01.02
Non-life Technical Provisions

		Direct business and accepted proportional reinsurance								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0020	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**	**C0100**
Technical provisions calculated as a whole	**R0010**									
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	**R0050**									
Technical provisions calculated as a sum of BE and RM										
Best estimate										
Premium provisions										
Gross	**R0060**	36		109	302	195	159	436	6,541	-
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0140**									
Net Best Estimate of Premium Provisions	**R0150**	36		109	302	195	159	436	6,541	-
Claims provisions										
Gross	**R0160**	122		453	1,595	43	227	267	5,308	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	**R0240**									
Net Best Estimate of Claims Provisions	**R0250**	122		453	1,595	43	227	267	5,308	-
Total Best estimate - gross	**R0260**	158		562	1,897	238	386	703	11,849	-
Total Best estimate - net	**R0270**	158		562	1,897	238	386	703	11,849	-
Risk margin	**R0280**	40		148	520	14	74	87	1,732	
Amount of the transitional on Technical Provisions										
Technical Provisions calculated as a whole	**R0290**									
Best estimate	**R0300**									
Risk margin	**R0310**									

		Direct business and accepted proportional reinsurance								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0020	**C0030**	**C0040**	**C0050**	**C0060**	**C0070**	**C0080**	**C0090**	**C0100**
Technical provisions - total										
Technical provisions - total	**R0320**	198		710	2,417	252	460	790	13,581	
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	**R0330**								-	
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	**R0340**	198	-	710	2,417	252	460	790	13,581	

Annex I
S.17.01.02
Non-life Technical Provisions

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
		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	
		C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010								
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0050								
Technical provisions calculated as a sum of BE and RM									
Best estimate									
Premium provisions									
Gross	R0060								7,778
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140								-
Net Best Estimate of Premium Provisions	R0150								7,778
Claims provisions									
Gross	R0160								8,015
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240								-
Net Best Estimate of Claims Provisions	R0250								8,015
Total Best estimate - gross	R0260								15,793
Total Best estimate - net	R0270								15,793
Risk margin	R0280								2,615
Amount of the transitional on Technical Provisions									
Technical Provisions calculated as a whole	R0290								
Best estimate	R0300								
Risk margin	R0310								

		Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
		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	
		C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions - total									
Technical provisions - total	R0320								18,408
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330								-
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340								18,408

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	Z0010	Underwriting Year

Gross Claims Paid (non-cumulative)

		Development year												
	Year	0	1	2	3	4	5	6	7	8	9	10 & +	In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
Prior	R0100											-	-	-
N-9	R0160	-	-	-	-	-	-	-	-	-	-		-	-
N-8	R0170	59	505	114	181	5	10	-	-	-			-	874
N-7	R0180	16	160	185	57	379	1	2	3				3	803
N-6	R0190	-	134	10	- 1	3	4	1					1	151
N-5	R0200	192	909	661	393	72	46						46	2,273
N-4	R0210	107	282	257	12	27							27	685
N-3	R0220	84	498	188	16								16	786
N-2	R0230	467	685	183									183	1,335
N-1	R0240	216	628										628	844
N	R0250	491											491	491
	Total	R0260											1,395	8,242

Gross undiscounted Best Estimate Claims Provisions

		Development year											Year end (discounted data)
	Year	0	1	2	3	4	5	6	7	8	9	10 & +	
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
Prior	R0100											-	-
N-9	R0160	-	-	-	-	-	-	-	-	-	-		-
N-8	R0170	-	-	-	-	-	-	48	39	66			56
N-7	R0180	-	-	-	-	-	164	127	144				125
N-6	R0190	-	-	-	-	45	37	156					135
N-5	R0200	-	-	-	643	404	98						87
N-4	R0210	-	-	1,021	681	144							131
N-3	R0220	-	1,854	1,140	261								238
N-2	R0230	3,317	2,314	1,205									1,124
N-1	R0240	3,658	2,549										2,356
N	R0250	4,128											3,763
	Total	R0260											8,015

Annex I

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Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation (EU) 2015/35						
Ordinary share capital (gross of own shares)	R0010	1,050	1,050			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	60,151	60,151			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					92
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	10	10			
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	61,283	61,191			92
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					

Annex I

S.23.01.01

Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
Available and eligible own funds						
Total available own funds to meet the SCR	**R0500**	61,283	61,191			92
Total available own funds to meet the MCR	**R0510**	61,191	61,191			
Total eligible own funds to meet the SCR	**R0540**	61,283	61,191			92
Total eligible own funds to meet the MCR	**R0550**	61,191	61,191			
SCR	**R0580**	19,464				
MCR	**R0600**	4,866				
Ratio of Eligible own funds to SCR	**R0620**	3.15				
Ratio of Eligible own funds to MCR	**R0640**	12.58				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	**R0700**	61,293
Own shares (held directly and indirectly)	**R0710**	
Foreseeable dividends, distributions and charges	**R0720**	
Other basic own fund items	**R0730**	1,142
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	**R0740**	
Reconciliation reserve	**R0760**	60,151
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	**R0770**	
Expected profits included in future premiums (EPIFP) - Non- life business	**R0780**	
Total Expected profits included in future premiums (EPIFP)	**R0790**	

Annex I
S.25.01.21
Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0100
Market risk	R0010	10,652		
Counterparty default risk	R0020	68		
Life underwriting risk	R0030			
Health underwriting risk	R0040	408		
Non-life underwriting risk	R0050	16,410		
Diversification	R0060	(5,767)		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	21,771		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	474
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	(2,781)
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	19,464
Capital add-on already set	R0210	
Solvency capital requirement	R0220	19,464
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

Annex I
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
MCR_{NL} Result	R0010	2,932

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020	158	100
Income protection insurance and proportional reinsurance	R0030		
Workers' compensation insurance and proportional reinsurance	R0040	562	500
Motor vehicle liability insurance and proportional reinsurance	R0050	1,897	800
Other motor insurance and proportional reinsurance	R0060	238	700
Marine, aviation and transport insurance and proportional reinsurance	R0070	386	200
Fire and other damage to property insurance and proportional reinsurance	R0080	703	550
General liability insurance and proportional reinsurance	R0090	11,849	8,549
Credit and suretyship insurance and proportional reinsurance	R0100		
Legal expenses insurance and proportional reinsurance	R0110		
Assistance and proportional reinsurance	R0120		
Miscellaneous financial loss insurance and proportional reinsurance	R0130		
Non-proportional health reinsurance	R0140		
Non-proportional casualty reinsurance	R0150		
Non-proportional marine, aviation and transport reinsurance	R0160		
Non-proportional property reinsurance	R0170		

Linear formula component for life insurance and reinsurance obligations

		C0040
MCR_{L} Result	R0200	

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210		
Obligations with profit participation - future discretionary benefits	R0220		
Index-linked and unit-linked insurance obligations	R0230		
Other life (re)insurance and health (re)insurance obligations	R0240		
Total capital at risk for all life (re)insurance obligations	R0250		

Overall MCR calculation

		C0070
Linear MCR	R0300	2,932
SCR	R0310	19,464
MCR cap	R0320	8,759
MCR floor	R0330	4,866
Combined MCR	R0340	4,866
Absolute floor of the MCR	R0350	4,243
		C0070
Minimum Capital Requirement	R0400	4,866