Pharma International Insurance Designated Activity Company

Solvency and Financial Condition Report for the Financial Period Ended 31 March 2020

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SUMMARY

This Report refers to the business of Pharma International Insurance Company DAC ('PIIDAC', '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 financial reporting period 1 January 2020 to 31 March 2020.

PIIDAC has prepared this report in accordance with the relevant articles of the Commission Delegated Regulation (EU) 2015/35, together with the guidelines on reporting and public disclosure issued by EIOPA.

The Ultimate Parent Company of PICDAC is Takeda Pharmaceutical Company Ltd (Takeda) a Company incorporated in Japan (100% share ownership).

The financial year end of the Company was changed from 31 December to 31 March to be coterminous with the year end of its ultimate holding company which is required for integration activities and managing certain tax exposures. Accordingly, the current SFCR is prepared for 3 months from 1 January 2020 to 31 March 2020 and as a result, the comparative figures stated in the various tables throughout the document are not comparable with the last year ended 31 December 2019.

The Company's business strategy was to provide coverage for risks for the Shire plc group which subsequently merged with Takeda in January 2019. The impact of insurance risk volatility on the Company's capital base is mitigated through the implementation of a diversified insurance programme with appropriate limits. During the prior year (Year ending 31 December 2019), the policies written under the general liability, property and marine programmes were amended to include legacy Takeda risks. In line with Takeda's own risk appetite, other policies expiring on 31 December 2019 were not renewed at 1 January 2020 except for the Employers Liability Irish programme which was renewed for a twelve-month period. A strategic captive review of the Company is currently being undertaken by Takeda and it is expected to be concluded towards the end of 2020.

Considering the material change to the level of business being underwritten in 2020 and the introduction of a new financial year-end of 31 March 2020, the existing reserving strategy was re-assessed during the period to determine its continued appropriateness.

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

The Board has identified the key risks to which PIIDAC 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 PIIDAC 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 a forward looking three-year business planning period. The results of this exercise are used to better inform decision making within the Company.

At the financial period ended 31 March 2020, the Company had eligible own funds of USD 306.7m available to meet its Solvency Capital Requirement (SCR) of USD 180.3m; resulting in a Solvency Ratio of 170% which is in line with the Company's risk appetite. The Board of Directors are satisfied that the Company has adequate and appropriate capital to support its business plans. The Minimum Capital Requirement (MCR) was also satisfactorily met at the financial period-ended. There were no instances of non-compliance with the capital requirements during the period.

A. BUSINESS & PERFORMANCE

A.1 Business

Pharma International Insurance Company DAC was incorporated in Ireland in 2002 and in line with the requirements of the Companies Act 2014 converted to a designated activity company (DAC), limited by shares, effective 23 December 2015. The principal activity of the Company is the provision of insurance to certain companies within the Takeda Group. PIIDAC is a captive insurance undertaking, underwriting only the risks of its parent group.

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

PIIDAC is authorised by the Central Bank of Ireland ('CBI'), under the European Union (Insurance and Reinsurance) Regulations 2015 (SI 485), to carry out the business of non-life insurance.

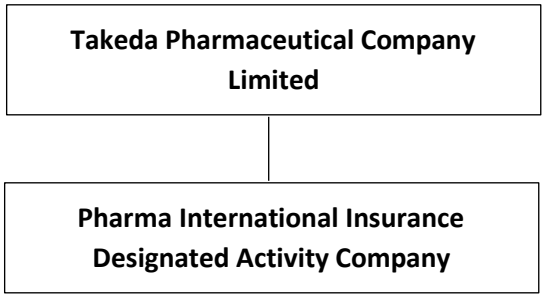
It has received a licence from the Central Bank of Ireland to write the following classes of business:

2 - Sickness
7 - Goods in Transit
8 - Fire and Natural Forces
9 - Other damage to Property
13 - General Liability
14 - Credit
16- Miscellaneous Financial Loss
17-Legal Expenses

The insurance supervision division at the CBI may be contacted at their offices in New Wapping Street, North Wall Quay, Dublin 1, Ireland.

KPMG, Chartered Accountants, were appointed as auditor to PIIDAC with effect from 27 November 2019. They are located at 1 Harbourmaster Place IFSC, Dublin 1, Ireland.

As at 31 March 2020, the Company direct share ownership (100%) was Takeda Pharmaceutical Company Limited, incorporated in Japan. The Company's current ownership structure is as follows:



Details on other Group subsidiaries and related undertakings are published within the Takeda Group Annual Report and Financial Statements, 2020, which is available to download at https://www.takeda.com/investors/reports/

At 1 January 2020, the Employer's Liability (Irish) business was written on direct basis USD 0.040m. Other Premium written in the financial period from 1 January 2020 to 31 March 2020 was fronted business and was an adjustment to the older underwriting years (2017 to 2019) USD 0.216m. The majority of the fronted business written in the period relates to the US business (75% of overall adjusted written premium amount). As a result, the principle of economic substance over legal form has been applied and these risks have been considered as direct insurance for the purposes of Solvency II.

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

PIIDAC conducts all its significant business activities from its office in Ireland, including:

- underwriting;
- premium invoicing and collection;
- claims reserving and payments; and
- investing.

A.2 Underwriting Performance

PIIDAC'S business is the provision of insurance in a manner which enhances the risk management, economic and administrative efficiency of the Takeda group. Insurance is provided under six regulatory lines of business: Medical Expense (not written since 2017), Marine, Aviation and Transport (not renewed in January 2020) Fire & Other Damage to Property, General Liability, Credit and Suretyship (not renewed in January 2020) and Miscellaneous Financial Loss (not renewed in January 2020).

Profit after tax for the financial period from 1 January 2020 to 31 March 2020 was USD 11.058m (31 December 2019: USD 83.607m), with a dividend of USD Nil paid to the parent as at 31 March 2020 (31 December 2019: USD Nil).

All premium written and earned in the period resulted from contracts of direct written premium and of proportional reinsurance concluded in the Republic of Ireland and are summarised by line of business below:

	Premium Written			Premium Earned		
Line of Business – USD '000	Period from 1 Jan to 31 Mar 2020	Year Ended 31 Dec 2019	Variance	Period from 1 Jan to 31 Mar 2020	Year Ended 31 Dec 2019	Variance
General Liability	0.065	71.060	(70.995)	0.452	63.593	(63.141)
Credit and Suretyship	-	1.956	(1.956)		1.956	(1.956)
Marine, Aviation & Transport	-	6.721	(6.721)	1.083	3.461	(2.378)
Fire & Other Damage to Property	0.191	22.176	(21.985)	2.802	14.315	(11.513)
Miscellaneous Financial Loss	-	4.143	(4.143)		4.143	(4.143)
Total	**0.256**	**106.056**	**(105.800)**	**4.337**	**87.468**	**(83.131)**

The decrease in the premium written from the year ended 31 December 2019 is due to the non-renewal of the 1 January 2020 direct business. Business under the Employer's liability (Irish) program was renewed at 1 January 2020 USD 0.040m. All other Premium written in the financial period from 1 January 2020 to 31 March 2020 was an adjustment to the older underwriting years (2017 to 2019) USD 0.216m. Premium earned during the period relates to the property and goods in transit policies which were incepted for a 12-month period from 1 October 2019, and the general liability policy which was incepted in June 2019 on a five-year basis.

Gross and net claims paid and claims handling expenses for the period from 1 January 2020 to 31 March 2020 was USD 0.471m (31 December 2019: receipt of USD 1.309m) and the movement in the provision for claims was a decrease of USD 8.286m for the three-month period ended (31 December 2019 Increase USD 0.769m). Due to the material change to the level of business that was underwritten during the financial period and the introduction of a new financial year-end of 31 March, the existing reserving strategy in place at 31 December 2019 was re-assessed during the period to determine its continued appropriateness. On the other liability lines of business that was in run-off at the financial period ended, 31 March 2020, the Company booked the reserves to the actuarial IBNR best estimate plus a margin of 10%. For all other Lines of business written and earned during the period, there was no change to the existing reserving strategy that was in place at the year ended 31 December 2019. There was a release of IBNR on the Credit, Cyber, Contingent BI, Non-damage BI, Brand restoration and Dutch Flood lines of business during the financial period which contributed to the overall favourable movement in the net provision for claims at the financial period ended 31 March 2020.

The following table summarises the results for the financial period from 1 January 2020 to 31 March 2020:

	Claims Paid and Claims Expenses			Gross and Net Incurred Claims		
Line of Business	Period from 1 Jan to 31 Mar 2020	Year Ended 31 Dec 2019	Variance	Period from 1 Jan to 31 Mar 2020	Year Ended 31 Dec 2019	Variance
	(USD '000)			(USD '000)		
General Liability	0.227	0.003	0.224	(4.719)	3.787	(8.506)
Credit	-	-	-	(1.956)	-	(1.956)
Marine, Aviation & Transport	0.002	0.444	(0.442)	1.017	1.103	(0.086)
Fire & Other Damage to Property	0.242	(1.756)	1.998	1.515	(4.195)	5.710
Miscellaneous	-	-	-	(4.143)	0.073	(4.216)
Total	**0.471**	**(1.309)**	**1.780**	**(8.286)**	**0.768**	**(9.054)**

Provision is made for notified losses on all underwriting years. As PIIDAC does not purchase any Outward Reinsurance cover, the gross technical provisions are equal to the net technical provisions.

The experience over the period across all classes has been significantly more benign than expected based on previous projections.

Approximately 47% of notified losses to the Company relate to US risks and this is consistent with prior years.

Net operating expenses for the financial period from 1 January 2020 to 31 March 2020 was USD 1.145m (December 2019: USD 2.668m).

A.3 Investment Performance

In line with the Company's documented investment policy, investments at the financial period ended 31 March 2020 included an Intercompany deposit, short term deposits accounts and cash with a range of credit institutions. Income arising from investment activities for the period was USD 1.666m (31 December 2019: USD 10.245m).

The Company has no investments in securitised asset classes and all investment income is recognised in the Company's income statement.

	Period 1 Jan to 31 Mar 2020 USD	Year Ended 31 Dec 2019 USD
Income from deposits with banks	57,081	284,382
Income from intercompany deposit	1,608,667	9,961,035
Total	**1,665,748**	**10,245,417**

A.4 Performance of other activities

PIIDAC does not engage in any activities other than those associated with captive insurance and has not entered into any leasing agreements.

A.5 Any other information

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

B. SYSTEM OF GOVERNANCE

B.1 General information on the system of governance

In order to meet the requirements for sound corporate governance, ensure 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.

The Board of Directors of the Company (thereafter 'the Board') acknowledges its responsibility to ensure that risks are fully understood and appropriately managed and has taken appropriate steps to ensure that risk management, reporting and control processes have been put in place in a manner which reflects the nature and scale of the captive's activities. The Board is the focal point of the governance system and is ultimately accountable and responsible for the performance and conduct of the Company.

All authority emanates from the Board and responsibilities are delegated in such a manner so as to ensure that no one individual has unfettered powers of decision and that business is undertaken in a controlled and responsible manner.

The overriding goal of the Company's risk management strategy is to control and to achieve, as much as possible, a reduction in the Company's risk exposure as a means of minimising the impact of undesired and/or unexpected events.

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

1. A 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. A 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 strategic objectives.

The Board annually reviews the governance framework, the risk appetite framework setting out tolerance limits and operational limits for all risk categories, the risk management policies for all risk categories and the risk register for the Company.

The Board members have:

- The necessary knowledge, skills, experience, expertise, competencies, professionalism, fitness, probity and integrity to carry out their duties;
- A full understanding of the nature of the Company's business, material activities and related risks;
- A full understanding of their individual direct and indirect responsibilities and collective responsibilities; and

- An understanding of the Company's financial statements and key performance drivers.

The Company comprises the following senior personnel who have been selected to ensure that the Company is being run by individuals of appropriate expertise and integrity and who meet the criteria set out above:

Elizabeth Oatten (Chairperson)
Denis (Tony) Ahern
Paul Donaldson
Vincent Barrett
Tanguy Gaidoni

There have been no material changes in the system of governance since the prior reporting period. Given the limited scale and complexity of the Company, and having reviewed the risks facing the Company thoroughly, the Board is satisfied that the system of governance in place is adequate.

The Board undertake responsibility for performing the equivalent function of an Audit Committee in relation to the financial reporting period ended 31 March 2020.

Key Functions

The key functions of Risk Management, Internal Audit, Actuarial, Compliance and Operations have clear and defined lines of reporting directly to the Board. This is facilitated by the straightforward nature of the Company's structure and fit-for-purpose documented policies and procedures which are clearly communicated and well understood by all relevant parties. The Board has ensured that the key functions are appropriately resourced and have the necessary authority and operational independence to perform their roles. The Company has engaged Aon Insurance Managers (Dublin) Limited ('AIMD') for the provision of management services, under the terms of an outsourced service and management agreement which is overseen by the Board of Directors.

Remuneration and material transactions

The members of the Board of Directors with the exception of the Independent Non-Executive Directors receive no remuneration for their services as directors to the Company. There are no employees and consequently no remuneration is paid.

As a captive insurer, all PIIDAC inward premiums flows and claims payments relate to insured risks of the shareholder group. In addition, the Company has an Intercompany Deposit with a Group subsidiary, Shire Ireland Finance Trading Limited. The management of the treasury function of PIIDAC has been outsourced also to Shire Ireland Finance Trading Limited under the supervision of the Board of Directors. In line with the service level agreement, an agreed fee is invoiced on an annual basis for the services acquired. Other than these transactions which arise in the normal course of business, the Company had no other material transactions during the reporting period with members of the shareholder group and none with members of the Board of Directors.

B.2 Fit and proper requirements

PIIDAC has documented its Fitness & Probity policy setting 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.

PIIDAC is satisfied that appointed individuals performing controlled functions meet all relevant regulatory requirements and have a suitable level of training and qualification to enable them to carry out their respective duties.

B.3 Risk Management System including the own risk and solvency assessment

The Company has taken appropriate actions in order to:

- embed risk management as a key function within its governance structure; and
- develop and maintain effective processes and reporting procedures to identify, measure, monitor, manage and report, on a continuous basis, the risks to which the Company is exposed.

Risk refers to the effect of uncertainty on the Company's ability to meet its objectives. Risk management is a systematic approach to protect the business resources and income against losses and unexpected events so that objectives of the Company can be achieved without unnecessary disruption.

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.

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

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

Own Risk and Solvency Assessment

The Company performs an Own Risk and Solvency Assessment ('ORSA') process annually in order to provide its Board of Directors with a forward-looking risk and capital assessment. The adequacy of the available capital, the Risk Appetite Framework and the appropriateness of the risk limits is assessed for the business planning period, considering the evolving risk profile. To this end, risks and scenarios to which the Company is exposed during the business planning period and which may affect the capacity to meet its insurance obligations or pose a threat to the achievement of its business objectives are taken into account. The approach may be summarised as follows:

Define the Stress scenarios

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

Business projections, stresses and scenarios are compiled by the Operations Functions with input and agreement from the Board of Directors to ensure that these are appropriate for the Company.

Stress the Financial Plan

Stress test scenarios are embedded into the projected financial plan. Related solvency capital requirements and solvency ratios are then calculated for each year, resulting in a stressed financial plan and the solvency impact of adverse scenarios. This exercise is 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. Where applicable, any future additional capital needs will be

identified and aligned to the Company's capital management 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 solvency capital requirements	Gathers information about: projected Solvency ratios; - explanations about deviations due to specific critical risks exposures.

The ORSA process described above ensures that the ORSA is integrated in the Company's decision making and business planning process. Furthermore, monitoring procedures as set out in the risk management policies ensure that risk exposures are measured on a regular basis triggering exception reports to 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 once the results of the ORSA process are presented to the Board for review and challenge.

The capital risk appetite for PIIDAC is to sustain its capital at a level sufficient to meet the Regulatory Solvency Capital Requirement at all times. The Board of Directors maintains a prudent approach to capital to ensure that PIIDAC is in a comfortable position to meet this obligation.

Takeda would always seek to be in a position to take prompt corrective action to replenish capital to an appropriate level in PIIDAC so that solvency capital compliance can be demonstrated. Takeda is expected to continue to have ample capacity to provide this support to PIIDAC.

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 Company's governance manual.
2) Risk assessment	Procedures and policies are detailed and formalised 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.

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 designed by the Risk Management Function, approved by the Board of Directors and evaluated by the Internal Audit Function. They are reviewed as often as necessary but at least annually.

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

Compliance Function

The Company has outsourced its Compliance Function to its Insurance Managers. The Insurance Managers have appointed a Head of Compliance who is responsible for overseeing all compliance activities and ensuring the Compliance Function of the Company is adequately resourced. The Compliance Function reports to the Board at each and every Board meeting on its activities.

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 and 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 in achieving its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of the risk management, control and governance processes of the Company. The audit approach is risk based and in line with an annual audit plan which is provided by the Head of Internal Audit to the Board of Directors.

The Board has developed effective policies and practices and will take appropriate corrective action in response to any weaknesses identified by internal and external auditors.

Independence and Impartiality

The Company's Internal Audit Function has been established to be independent of the activities audited, 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 ensures that the Internal Audit Function reports directly to the Board of the Company.

B.6 Actuarial Function

The Company has established an effective Actuarial Function, including a nominated Head of Actuarial Function ('HoAF') approved by the CBI, which carries out the following key tasks:

- coordinate the calculation of technical provisions;
- identify any inconsistency 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;
- explain any material effects of changes of data, methodologies or assumptions between valuation dates on the amount of technical provisions;
- assess 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 will provide recommendations on internal procedures to improve data quality;

- take into consideration the interrelations between the Underwriting Policy, reinsurance arrangements and technical provisions, when providing its opinion;
- report in writing at least annually to the Board of Directors. The reporting should document all material tasks that have been undertaken by the Actuarial Function, and include:
  i details of technical provisions
  ii methodologies & assumptions
  iii data sufficiency & quality
  iv experience analysis
  v report to the Board on reliability & adequacy
  vi opinion on Underwriting Policy vii opinion on reinsurance arrangements.

Their report should include any deficiencies identified and give recommendations as to how such deficiencies could be remedied

- contribute to the effective implementation of the risk management system in particular:
  i) with regard to risk modelling underlying the calculation of the Solvency and Minimum Capital Requirement; and
  ii) the ORSA process.
- think critically and organise the execution of actuarial approaches
- provide an Actuarial Opinion to the Board of Directors in respect of the ORSA

In establishing the Company's Actuarial Function, the Board of Directors has ensured that the persons involved have the requisite qualifications and demonstrable experience in the area of non-life reserving and are fully conversant with the Solvency II requirements for the calculation of Technical Provisions.

B.7 Outsourcing

All functions and activities of the Company are eligible to be outsourced provided that specific criteria are satisfied in each instance.

The Board is responsible for the approval and termination of all outsourcing arrangements of critical or important functions or activities. Critical or important functions or activities include key functions

relating to the Company's System of Governance and all functions within the Company that are fundamental to carry out its core business.

The Board is responsible for ensuring notification to the CBI 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 objectives of PIIDAC'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 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;
- Conflicts of Interest;
- Breach of the Company's data protection obligations.

The Board is responsible for assessing the risks associated with the outsourcing of critical or important functions or activities, carrying out the appropriate due diligence on the outsourced service provider and for reviewing the performance of outsourced service providers against their agreed and documented Service Level Agreements ('SLA'). All this is completed to ensure the service provider has the ability, capacity and authorisation required by law to deliver the required functions.

The management of the Company is coordinated and carried out at its place of business in Ireland. PIIDAC engages outsourced service providers in order to access the expertise and strength and depth of resources necessary to manage the specific requirements of a regulated captive insurance company operating on a global basis.

The following critical or important functions / activities are outsourced:

Critical or important function	Outsourced Service Provider	Jurisdiction
Underwriting administration	Aon Insurance Managers (Dublin) Limited (AIMD)	Ireland
Claims administration	AIMD	Ireland
Finance and accounting	AIMD	Ireland
Compliance Function	AIMD	Ireland
Risk Management Function	AIMD	Ireland
Actuarial Function	Aon UK Limited (Aon UK)	United Kingdom
Internal Audit Function	Aon Commercial Services Ireland Limited (ACSIL)	Ireland

B.8 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 variation in the Company's performance over 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 the statistical and accounting data to be considered in both premium pricing and loss reserving exercises.

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 and nature 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 liability risks which the Company underwrites.

The Company manages these risks through its Underwriting and Clams Committee with the support of external expertise to assist in the review of the pricing adequacy. The Company also monitors emerging issues and factors for 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 Company's Actuarial Function.

The Company has not completed the 2020 ORSA process at the time of reporting for the financial period ended 31 March 2020. PIIDAC continually stress tested a scenario incorporating differing claims experience in prior year's. In the event that significantly adverse claims development was

experienced, the intercompany deposit can be reduced or repaid in full in order to increase the capital surplus.

Sensitivity analysis is also performed for underwriting risks by selecting conservative movements in gross claims reserves for financial statements purposes and holding all other assumptions constant.

The resultant gross and net claims reserves and impact on profit before tax (PBT) and shareholder equity is shown below:

	Gross claims reserve USD '000	**Net claims reserve USD '000**	**Impact PBT for the year USD '000**	**Impact on Equity for the year USD'000**
Period Ended 31 March 2020				
Increase in Reserves by 10%	**171.640**	**171.640**	**(15.603)**	**(13.653)**
Decrease in Reserves by 10%	**140.433**	**140,433**	**15.603**	**13.653**
Year Ended 31 December 2019				
Increase in Reserves by 10%	180.755	180.755	(16.432)	(14.378)
Decrease in Reserves by 10%	147.891	147.891	16.432	14.378

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 Company diversifies its portfolio to reduce the exposure to market fluctuations and market risk concentrations.

PIIDAC 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.

There were no material changes to the measures used to assess the market risk exposure or the material risks over the reporting period.

Interest rate risk arises on the return on the Company's investments including cash and deposits with credit institutions. The sensitivity analysis of net income to fluctuation in interest rate is shown below:

Estimated approximate effects on net income

Sensitivity Test	**Period 1 Jan to 31 Mar 2020 USD '000**	**Year Ended 31 Dec 2019 USD '000**
Shift up 100 basis points	4.726	4.362
Shift down 100 basis points	-4.726	-4.362

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 ultimate settlement of loss reserves may be in currencies other than the USD. The Company's exposure to foreign exchange risk arises with respect to Euro.

At the financial period ended 31 March 2020, the Intercompany deposit was secured by a parental guarantee by the Parent Company Takeda. This allowed PIIDAC to use the credit rating when calculating the concentration risk and spread risk changes due to this exposure. The rating of Takeda Pharmaceutical Company Ltd at 31 March 2020 was BBB+.

The Company stress tested the impact of a theoretical downgrade of the credit rating of Takeda's long-term issuer credit and senior unsecured debt rating downgraded to BB from its current rating BBB+ in prior years. While this scenario resulted in a reduction in the Company's available capital which could be easily remedied by recalling funds from the Intercompany deposit.

C.3 Credit risk

Credit risk is the risk that one party to a financial instrument 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:

- Financial Investments
- Cash and cash equivalents
- Intercompany Deposit
- Insurance balances receivable (Intra Group)

The Company utilises custodians deemed to be of high credit quality to hold its cash and cash equivalents and deposits with credit institutions, and additionally has limits in place in relation to the amount of cash which can be held by any one financial institution.

The Company has Standby Letters of Credit (SBLC's) in place that are used to support technical provisions due to various third-party insurance companies (the beneficiaries) under reinsurance contracts entered by the Company. The majority of SBLC's are collateralised and constitute the assets of the Company on the balance sheet USD 32.500m. The Company holds one SBLC that is non-collateralised for USD 2.000m. The Company's other SBLC is held in favour of the inland revenue for USD 0.075m and is non-collateralised.

There were no material changes to the measures used to assess the credit risk exposure or the material risks over the reporting period.

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 has the potential to be exposed to 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 material costs or penalties.

The Company has determined that liquidity risk does not represent a significant exposure to its business. This assessment is based on the fact that the Company has its investments held in highly liquid assets which it can access immediately or within a very short time frame without incurring material costs or penalties. Investments are in compliance with the Company's investment guidelines.

There were no material changes to the measures used to assess the liquidity risk exposure or the material risks over the reporting period.

The total amount of expected profits included in the future premiums is USD 4.481m.

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 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.

In addition, PIIDAC is subject to Internal and External Audit review.

PIIDAC maintains a regulatory dialogue with the CBI to mitigate the risk of any potential sanction or compliance breach as well as using expert, industry leading, service providers to provide its outsourced functions which helps avoid any material error or delay. In order to ensure the quality of the outsourced functions is as high as possible, PIIDAC puts in place service level agreements outlining key performance indicators against which its outsourced service providers can be monitored and assessed.

The Company does not consider that it is exposed to material residual risk in this area due to the formality that has been created around the Company’s processes and procedures including those for financial and regulatory reporting. There is no specific risk concentration associated with this category as internal controls include appropriate segregation of duties.

There were no material changes to the measures used to assess the operational risk exposure or the material risks over the reporting period.

C.6 Other material Risks

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 of 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. The Board of Directors will ensure continuing appropriateness, at least annually and revisions shall be affected where necessary.
- 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.

C.7 Any other information

The Company has not experienced any material adverse financial impact from Covid-19 to date, but the global nature of the pandemic's effects has the potential to have a negative impact on the Company's future results or operations. The future impact of the current economic situation is uncertain and difficult to predict. The Board and the Underwriting and Claims Committee are actively monitoring developments and any potential impact on the risk profile of the Company.

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

D. VALUATION FOR SOLVENCY PURPOSES

D.1 Assets

PIIDAC prepares its financial statements on a going concern basis in accordance with the Financial Reporting Council of the UK, including financial reporting standard applicable in UK and Republic of Ireland (FRS 102 & FRS 103), 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. Assets relating to unpaid premium are included in the technical provision balance.

PIIDAC uses the historical cost convention.

PIIDAC has the following classes of assets:

- Deposits other than cash equivalents
- Cash and cash equivalents
- Other financial investments
- Intercompany deposit
- Insurance debtors (intra group)
- Accrued Interest
- Deferred acquisition costs

Deposits other than cash equivalents represents short term deposits with an original maturity of three months or less and is stated at market value for both solvency and financial statement purposes, the only difference being the inclusion of accrued interest for Solvency II valuation purposes. Accrued interest is disclosed as a separate line item in the financial statements.

Cash at bank and in hand are current accounts with daily liquidity. The Company utilises custodians deemed to be of high credit quality to hold its cash. Carrying amounts approximate fair value due to the high liquidity of the instruments.

Other financial investments represent the collateral held against the Standby Letters of Credit supporting the technical provisions of the Company. The amount is stated at market value for both Solvency II and financial statement purposes.

The intercompany deposit to Shire Ireland Finance Trading Limited a subsidiary of Takeda registered in Ireland, is stated at market value for both regulatory and financial statement purposes, the only difference being the inclusion of accrued interest for Solvency II valuation purposes. Accrued Interest is disclosed as a separate line item in the financial statements.

The treatment of future cash flows relating to Insurance debtors is dealt with as part of the calculation of technical provisions (Section D2 below). Deferred acquisition costs are not an admissible asset for Solvency II valuation purposes.

A reconciliation of the valuation for Solvency II purposes at the financial period ended 31 March 2020 is as follows USD ‘000:

Assets	Financial Statements	Solvency II	Reclass.	Fair Value Adj.
Deposits other than cash equivalents	11,440	11,462	+22	--
Cash and cash equivalents	3,339	3,339	-	-
Other Financial Investments	32,611	32,611	-	-
Intercompany deposit	453,089	453,213	+124	-
Insurance Debtors	21,182	451	-	-20,731
Accrued Interest	147	-	-147	-
Prepayments	12	-	-	-12
Deferred acquisition costs	2,132	-		-2,132
Total	**523,951**	**501,076**	**-**	**-22,875**

D.2 Technical Provisions

The technical provisions of PIIDAC at the financial period ended 31 March 2020 relate to Marine, Aviation and Transport Insurance (Marine), Fire & other Damage to Property (Property), General Liability (Liability. The table below sets out the gross and net amounts in USD'000:

SII Line of Business	Claim Provision	Premium Provision	Best Estimate	Risk Margin	Technical Provisions
Marine	3,924	-395	3,530	261	3,791
Property	6,229	-1,943	4,286	414	4,701
Liability	136,103	-689	135,415	9,049	144,464
Total	**146,256**	**-3,026**	**143,231**	**9,724**	**152,955**

These amounts comply in all material respects with the relevant Solvency II requirements.

The starting point for the calculation of the Solvency II technical provisions is the amounts which have been calculated for the financial statements reserving basis. Within the financial statements, full provision is made for the estimated cost of all claims notified but not settled at the period-end using the best information available at that time. Provision is made for the cost of claims incurred but not reported and at the period-end, and potential development on outstanding claims estimates (together regarded as IBNR reserves). In addition, an estimate is made for future claims handling expenses relating to claims outstanding at the period-end.

The Company takes all reasonable steps to ensure that it has appropriate information regarding its claims exposures. In estimating the cost of claims notified but not paid, the Company has regard to claims circumstances as reported, any information available from loss adjusters and information on the cost of settling claims with similar characteristics in previous periods. IBNR provisions are established having regard for the results of a valuation on a best-estimate basis by an independent actuary together with a margin for uncertainty which has been determined by management.

Claims projections have been carried out using a range of standard actuarial methods, including the Chain Ladder (CL), the Incurred Bornhuetter-Ferguson method (IBF), the Loss Ratio Method (IELR) and

the Generalised Cape Cod (GCC) method. The CL method estimates the ratio by which cumulative claims to date will increase (or decrease) at annual intervals from the date of policy inception. The 12 to 24-month ratio (for example) is estimated by taking the average ratio observed in policies 24 months or more from their date of inception. The IBF method is a blended method of claims development where estimates of ultimate claims derived using a loss development (or Chain Ladder) method are blended with the estimates derived using alternative methods. It is often blended with estimates using the IELR method. The GCC method is a Bornhuetter-Ferguson methodology in which the exposure based ultimate claims estimates are derived by considering the ratios of the Chain Ladder ultimate to exposure measures. An expected ratio is calculated for each policy period based on a weighted average adjusted for any significant trend, using a decay factor of 75%. The IELR is an exposure based expected loss approach that often applies the average ultimate loss ratio for earlier years of the portfolio to more recent exposures (e.g. turnover). It is sometimes referred to as the Initial Expected Loss Ratio method.

Solvency II requires undertakings to hold technical provisions which correspond to the amount they would have to pay to transfer their (re)insurance obligations immediately to another undertaking. This value comprises a **best estimate** and a **risk margin**, intended to represent a market consistent valuation**.** The technical provisions take account of the time value of money by discounting using a risk-free interest rate term structure as at the valuation date. There is no allowance for prudence in the calculation of best estimates.

The best estimate is calculated by considering all future cash inflows and outflows required to settle the existing (re)insurance obligations over their lifetime. It represents the mean outcome of all possible scenarios, taking account of how likely they are to occur and their potential variability. In this regard, the best estimate is a probability-weighted average of future cash flows, allowing for the time value of money.

The Solvency II best estimate is calculated gross. The best estimate is made up of a claims provision and a premium provision, relating to past and future exposures respectively. Claims payments in the claim and premium provisions have been projected at annual intervals using annual paid development patterns.

The Solvency II claims provision is equivalent to the expected net present value of the best estimate claims reserve, with additional allowances to allow for all possible outcomes through the inclusion of provisions for Events Not in Data (ENID) and the future expenses that will be incurred in servicing the existing reinsurance obligations. The claims provision also includes all unpaid premium relating to earned exposures that are within payment terms.

Under the Solvency II contract boundary definition, any policies which have been bound, even if unincepted as at the valuation date, must be considered in the premium provision. The Solvency II premium provision is therefore equivalent to the expected net present value of the following cash inflows and outflows, relating to unearned exposure from incepted contracts and exposure from unincepted contracts bound as at the valuation date:

- Cash flows from future premiums in relation to future claims;
- Cash flows arising from future claim events (e.g. claims payments);
- Cash flows arising from loss adjustment expenses in respect of claims events occurring after the valuation date;

- Cash flows arising from the ongoing administration of policies in-force as at the valuation date; and
- Cash flows arising from salvage and subrogation.

The key drivers of the SII premium provision for PIIDAC are the adjustment of unearned premium reserves on the existing policies and to the best estimate basis and the inclusion of unpaid premiums.

PIIDAC has employed techniques and assumptions that are appropriate for the purpose of calculating its Solvency II technical provisions. The actual amounts required to meet future claim payments may differ from estimates for a number of reasons, such as model specification error, parameter error and random error due to the inherent uncertainty in insurance. External environment risk factors may cause material deviations in estimates of technical provisions, including inflation and currency exchange rate fluctuations.

The Solvency II risk margin is intended to represent an amount that PIIDAC 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 risk margin is consistent with the Solvency II regulations, applying a 6% cost of capital to the amount of capital required at the beginning of each year to support the run-off of the insurance obligations. These future costs of capital are then discounted to the valuation date and summed to calculate the amount of risk margin required. The resultant differences between the value of technical provisions for solvency purposes and the financial statements for the financial period ended 31 March 2020 are shown below:

	For the period ended 31 March 2020 Value (in USD '000)
Technical provisions per financial statements	**170.544**
Adjustment to best estimate	(16.758)
Allowance for ENID	3.526
Premium cash flows	(14.455)
Claims cash flows	0.455
Expected expenses	1.415
Undiscounted technical provisions	**144.727**
Discounting on claims provision	(1.311)
Discounting on premium provision	(0.185)
Discounted technical provisions	**143.231**
Risk Margin	9.724
Solvency II technical Provisions	**152.955**

Information on how the Company manages risk in the area of underwriting and reserving is set out in Section C1 above. Operational risks relating to the Company's technical provisions and claims data are managed using the Control Framework described in Section B4 above.

The Company is satisfied that it has access to sufficient historical claims data on an annual basis for the calculation of its technical provisions and that this data is accurate and appropriate for the

Company's needs. Claims management processes by the Company are appropriate and adequate given the nature of the underlying risks. Significant reporting delays are not experienced.

In calculating its technical provisions on a Solvency II basis, PIIDAC 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

Other liabilities of USD 8.803m relate to tax payable and accrued expenses and are classified as Payables (trade, not insurance) USD 7.981m and any other liabilities, not elsewhere shown USD 0.822m respectively for solvency purposes. This amount is USD 0.016m higher than that disclosed in the financial statements due to the application of discounting to the balance.

Creditors arising out of Insurance Operations USD 6.321m in the statutory financial statements relates to claims payable and is part of the unpaid claims cash flow within the calculation of the technical provisions (section D.2 above)

A deferred tax liability of USD 0.127m arises due to the valuation difference on the technical provisions, debtors and creditors between the financial statements and Solvency II balance sheet multiplied by the applicable tax rate (12.5%). There is no deferred tax liability in the financial statements.

D.4 Alternative methods for valuation

No alternative methods were used.

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 3 year 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 this 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. There have been no material changes to this approach from the prior year.

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 monthly basis to take account of the profits/losses earned in the period together with any Solvency II valuation adjustments on a quarterly basis.

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:

	Period Ended 31 Mar 2020 USD	**Year Ended 31 Dec 2019 USD**
Ordinary paid up share capital	95,000,000	95,000,000
Reconciliation reserve	211,690,954	210,472,485
Total basic own funds	**306,690,954**	**305,472,485**

The movement in basic own funds during the reporting period reflects the profitability of the Company during the reporting period. The reconciliation reserve represents the Company's retained profits as adjusted for Solvency II valuation principals. The adjustments which arise in the application of these principles are shown in the equity reconciliation below.

For the financial period ended 31 March 2020 eligible own funds available to meet the Company's SCR and MCR are USD 306.691m comprised solely of Tier 1 capital.

The equity position as shown in the Company's financial period ended 31 March 2020 financial statements can be reconciled to the basic own funds balance under Solvency II as follows:

	USD'000
Equity per the Company's financial statements	**338,299**
Adjustments to technical provisions	17,589
Reallocation of insurance debtors and creditors	(14,001)
Removal of deferred acquisition costs	(2,132)
Removal of prepayments	(420)
Discounting of balance sheet items	(17)
Deferred tax liability	(127)
Restricted funds (Letter of Credit Obligations)	(32,500)
Own funds	**306,691**

Adjustments are made to technical provisions in line with the valuation methodologies set out in section D.2 above. In addition, PIIDAC debtor/creditor items relating to unpaid premium/claim balances are included within the technical provision calculation, given that they are all within credit terms. Accrued liabilities have been discounted. Deferred acquisition costs are not an admissible asset for Solvency II valuation purposes. These adjustments are reflected in the Company's reconciliation reserve. A deferred tax liability is recognised due to the increase in available capital between the financial statements and the regulatory own funds.

PIIDAC has no ancillary own funds and there are no transitional arrangements impacting its capital calculations.

E.2 Solvency capital requirement and minimum capital requirement

At the end of the current reporting period, PIIDAC SCR and MCR have been calculated as USD 180.3m and USD 45.1m respectively.

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 2020. Based on the Company's eligible own funds of USD 306.691m the Company has a solvency ratio at the financial period ended 31 March 2020 of 170%.

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 for the financial period ended 31 March 2020 is shown below, together with the year ended 31 December 2019 year comparative:

Risk Charge	Period Ended 31 March 2020 USD'000	Year Ended 31 Dec 2019 USD'000	Change USD'000
Premium/Reserve Risk	54,884	63,092	(8,209)
Catastrophe Risk	44,805	44,805	-
Lapse Risk	1,231	1,794	(562)
Diversification Benefit	(21,858)	(23,640)	1,782
Non-Life Underwriting Risk	**79,062**	**86,051**	**(6,989)**
Counterparty Default Risk	**26,994**	**27,872**	**(879)**
Interest Rate Risk	6,826	7,925	(1,099)
Spread Risk	26,818	30,217	(3,400)
Currency Risk	2,159	3,217	(1,057)
Concentration Risk	120,416	124,775	(4,359)
Diversification Benefit	(32,498)	(37,229)	4,731
Market Risk	**123,720**	**128,904**	**(5,184)**
Diversification Benefit	(53,762)	(56,981)	3,219
BSCR	**176,014**	**185,847**	**(9,833)**
Operational Risk	**4,297**	**4,557**	**(260)**
Tax Adjustments	**-**	**-**	-
SCR	**180,311**	**190,403**	**(10,092)**
Available Capital to meet SCR	306,691	305,472	1,218
Surplus/(Deficit)	**126,380**	**115,069**	**11,311**
Solvency Ratio	**170%**	**160%**	**10%**
MCR	**45,078**	**47,601**	**(2,523)**

The Non-Life Underwriting Risk, premium and reserve risk has decreased since the prior valuation at 31 December 2019. The reduction in the premium risk charge was due to the majority of the business due for renewal at 1 January 2020 not incepted expect for the Irish Employers liability risk. The net claims provisions have decreased from US156.000m to US146.000m, resulting in a lower reserve risk charge. The reduction is driven by the release of reserves during the period following the re-assessment of the Company reserving strategy in light of the material changes to the level of business being underwritten in the period and the introduction of the new financial year end of 31 March.

The decrease in the lapse risk over the 3-month period from the year ended 31 December 2019 is due to the reduction in the unearned exposure.

The counterparty default risk charge is driven by the default risk associated with the parental guarantee attached to the intercompany deposit which allows the intercompany deposit to adopt the parent company credit rating for the purpose of the SCR calculation. This reduces the market risk relating to the intercompany deposit, however the mitigation benefit is subject to the counterparty default risk. The increase to the counterparty default risk is due to the increase in the deposit amount during the period.

The decrease to the market risk charge is driven by the intercompany deposit amount, decreasing from USD 469.283m to USD 453.089m. This leads to a reduction to the concentration risk module and spread risk modules.

The MCR is calculated through a prescribed formula based on the net technical provisions (excluding the risk margin) and net written premium. It is also constrained to be between 25% and 45% of the SCR. Further to this, SI 485 sets out absolute minimum MCR values for non-life and life insurers, reinsurers and captives. In the case of PIIDAC, as a non-life captive insurer this absolute floor is EUR 3,700,000. Having carried out the calculations and applied the relevant limits, the resultant MCR for the Company is USD 45.078m.

E.3Use of duration-based equity risk sub module in calculation of the solvency capital requirement

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

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

PIIDAC used the standard formula in determining its SCR and MCR and did not rely on any internal model.

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

S.23.01.01 – Own funds*

S.25.01.21 – SCR using standard formula*

S.28.01.01 – MCR*

*templates subject to external audit.

Amounts are in USD'000

S.02.01.02 - Balance Sheet (In thousands of USD)

		C0010
		Solvency II value
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)	44,073
R0080	Property (other than for own use)	
R0090	Holdings in related undertakings, including participations	
R0100	Equities	0
R0110	Equities - listed	
R0120	Equities - unlisted	
R0130	Bonds	0
R0140	Government Bonds	
R0150	Corporate Bonds	
R0160	Structured notes	
R0170	Collateralised securities	
R0180	Collective Investments Undertakings	
R0190	Derivatives	
R0200	Deposits other than cash equivalents	11,462
R0210	Other investments	32,611
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	453,213
R0240	Loans on policies	
R0250	Loans and mortgages to individuals	
R0260	Other loans and mortgages	453,213
R0270	Reinsurance recoverables from:	0
R0280	Non-life and health similar to non-life	0
R0290	Non-life excluding health	
R0300	Health similar to non-life	
R0310	Life and health similar to life, excluding health and index-linked and unit-linked	0
R0320	Health similar to life	
R0330	Life excluding health and index-linked and unit-linked	
R0340	Life index-linked and unit-linked	
R0350	Deposits to cedants	
R0360	Insurance and intermediaries receivables	451
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	3,339
R0420	Any other assets, not elsewhere shown	
R0500	**Total assets**	501,076

S.02.01.02 - Balance Sheet (In thousands of USD)

		C0010 Solvency II value
Liabilities		
R0510	Technical provisions – non-life	152,955
R0520	Technical provisions – non-life (excluding health)	152,955
R0530	Technical provisions calculated as a whole	
R0540	Best Estimate	143,231
R0550	Risk margin	9,724
R0560	Technical provisions - health (similar to non-life)	0
R0570	Technical provisions calculated as a whole	
R0580	Best Estimate	
R0590	Risk margin	
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	Technical provisions - health (similar to life)	0
R0620	Technical provisions calculated as a whole	
R0630	Best Estimate	
R0640	Risk margin	
R0650	Technical provisions – life (excluding health and index-linked and unit-linked)	0
R0660	Technical provisions calculated as a whole	
R0670	Best Estimate	
R0680	Risk margin	
R0690	Technical provisions – index-linked and unit-linked	0
R0700	Technical provisions calculated as a whole	
R0710	Best Estimate	
R0720	Risk margin	
R0730	Other technical provisions	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	127
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)	7,981
R0850	Subordinated liabilities	0
R0860	Subordinated liabilities not in Basic Own Funds	
R0870	Subordinated liabilities in Basic Own Funds	
R0880	Any other liabilities, not elsewhere shown	822
R0900	Total liabilities	161,886
R1000	**Excess of assets over liabilities**	339,191

S.05.01.02 - Premiums, claims and expenses (In thousands of USD)

		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								40	
Gross - Prop reinsurance accepted	R0120							191	25	
Gross - Non-Prop reinsurance accepted	R0130									
Reinsurers' share	R0140									
Net	R0200	0	0	0	0	0	0	191	65	0
Premiums earned										
Gross - Direct Business	R0210						26		10	
Gross - Prop reinsurance accepted	R0220						1,057	2,802	442	
Gross - Non-Prop reinsurance accepted	R0230									
Reinsurers' share	R0240									
Net	R0300	0	0	0	0	0	1,083	2,802	452	0
Claims incurred										
Gross - Direct Business	R0310							-400	-2,665	-1,956
Gross - Prop reinsurance accepted	R0320						1,017	2,117	-1,854	
Gross - Non-Prop reinsurance accepted	R0330									
Reinsurers' share	R0340									
Net	R0400	0	0	0	0	0	1,017	1,717	-4,519	-1,956
Changes in other technical provisions										
Gross - Direct Business	R0410									
Gross - Prop reinsurance accepted	R0420									
Gross - Non-Prop reinsurance accepted	R0430									
Reinsurers' share	R0440									
Net	R0500	0	0	0	0	0	0	0	0	0
Expenses incurred	R0550						312	715	222	
Other expenses	R1200									
Total expenses	R1300									

S.05.01.02 - Premiums, claims and expenses (In thousands of USD)

		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								40
Gross - Prop reinsurance accepted	R0120								216
Gross - Non-Prop reinsurance accepted	R0130								0
Reinsurers' share	R0140								0
Net	R0200	0	0	0	0	0	0	0	256
Premiums earned									
Gross - Direct Business	R0210								36
Gross - Prop reinsurance accepted	R0220								4,301
Gross - Non-Prop reinsurance accepted	R0230								0
Reinsurers' share	R0240								0
Net	R0300	0	0	0	0	0	0	0	4,337
Claims incurred									
Gross - Direct Business	R0310			-4,143					-9,164
Gross - Prop reinsurance accepted	R0320								1,280
Gross - Non-Prop reinsurance accepted	R0330								0
Reinsurers' share	R0340								0
Net	R0400	0	0	-4,143	0	0	0	0	-7,885
Changes in other technical provisions									
Gross - Direct Business	R0410								0
Gross - Prop reinsurance accepted	R0420								0
Gross - Non-Prop reinsurance accepted	R0430								0
Reinsurers' share	R0440								0
Net	R0500	0	0	0	0	0	0	0	0
Expenses incurred	R0550								1,249
Other expenses	R1200								
Total expenses	R1300								1,249

S.05.01.02 - Premiums, claims and expenses (In thousands of USD)

		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									0
Reinsurers' share	R1420									0
Net	R1500	0	0	0	0	0	0	0	0	0
Premiums earned										
Gross	R1510									0
Reinsurers' share	R1520									0
Net	R1600	0	0	0	0	0	0	0	0	0
Claims incurred										
Gross	R1610									0
Reinsurers' share	R1620									0
Net	R1700	0	0	0	0	0	0	0	0	0
Changes in other technical provisions										
Gross	R1710									0
Reinsurers' share	R1720									0
Net	R1800	0	0	0	0	0	0	0	0	0
Expenses incurred	R1900									0
Other expenses	R2500									
Total expenses	R2600									0

S.05.02.01 - Premiums, claims and expenses by country (In thousands of USD)

		Home country	Country (by amount of GWP)					Total for top 5 countries and home country
			BM	GB				
		C0080	C0090	C0090	C0090	C0090	C0090	C0140
Premiums written								
Gross - Direct Business	R0110	40						40
Gross - Proportional reinsurance accepted	R0120		25	191				216
Gross - Non-proportional reinsurance accepted	R0130							0
Reinsurers' share	R0140							0
Net	R0200	40	25	191	0	0	0	256
Premiums earned								
Gross - Direct Business	R0210	10		26				36
Gross - Proportional reinsurance accepted	R0220		1,499	2,802				4,301
Gross - Non-proportional reinsurance accepted	R0230							0
Reinsurers' share	R0240							0
Net	R0300	10	1,499	2,828	0	0	0	4,337
Claims incurred								
Gross - Direct Business	R0310	-6,184						-6,184
Gross - Proportional reinsurance accepted	R0320		-838	2,013				1,175
Gross - Non-proportional reinsurance accepted	R0330							0
Reinsurers' share	R0340							0
Net	R0400	-6,184	-838	2,013	0	0	0	-5,008
Changes in other technical provisions								
Gross - Direct Business	R0410							0
Gross - Proportional reinsurance accepted	R0420							0
Gross - Non-proportional reinsurance accepted	R0430							0
Reinsurers' share	R0440							0
Net	R0500	0	0	0	0	0	0	0
Expenses incurred	R0550	2	527	720				1,249
Other expenses	R1200							
Total expenses	R1300							1,249

S.17.01.02 - Non Life technical provisions (In thousands of USD)

		Direct business and accepted proportional reinsurance											
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130
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 calculated as a whole	R0050												
Technical provisions calculated as a sum of BE and RM													
Best estimate													
Premium provisions													
Gross	R0060						-395	-1,943	-689				
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	0	0	0	0	0	-395	-1,943	-689	0	0	0	0
Claims provisions													
Gross	R0160						3,924	6,229	136,103				
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	0	0	0	0	0	3,924	6,229	136,103	0	0	0	0
Total Best estimate - gross	R0260	0	0	0	0	0	3,530	4,286	135,415	0	0	0	0
Total Best estimate - net	R0270	0	0	0	0	0	3,530	4,286	135,415	0	0	0	0
Risk margin	R0280						261	414	9,049				
Amount of the transitional on Technical Provisions													
Technical Provisions calculated as a whole	R0290												
Best estimate	R0300												
Risk margin	R0310												
Technical provisions - total													
Technical provisions - total	R0320	0	0	0	0	0	3,791	4,701	144,464	0	0	0	0
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	0	0	0	0	0	0	0	0	0	0	0	0
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	0	0	0	0	0	3,791	4,701	144,464	0	0	0	0

S.17.01.02 - Non Life technical provisions (In thousands of USD)

		Accepted non-proportional reinsurance				TOTAL
		Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
		C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010					0
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	R0050					0
Technical provisions calculated as a sum of BE and RM						
Best estimate						
Premium provisions						
Gross	R0060					-3,026
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140					0
Net Best Estimate of Premium Provisions	R0150	0	0	0	0	-3,026
Claims provisions						
Gross	R0160					146,256
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240					0
Net Best Estimate of Claims Provisions	R0250	0	0	0	0	146,256
Total Best estimate - gross	R0260	0	0	0	0	143,231
Total Best estimate - net	R0270	0	0	0	0	143,231
Risk margin	R0280					9,724
Amount of the transitional on Technical Provisions						
Technical Provisions calculated as a whole	R0290					0
Best estimate	R0300					0
Risk margin	R0310					0
Technical provisions - total						
Technical provisions - total	R0320	0	0	0	0	152,955
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	0	0	0	0	0
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	0	0	0	0	152,955

S.19.01.21 - Claim development triangles (In thousands of USD)

Gross Claims Paid (non cumulative absolute amount)

		0	1	2	3	4	5	6	7	8	9	10+	Current year	All years
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
Prior	R0100												0	0
N-9	R0160		53			104							0	157
N-8	R0170												0	0
N-7	R0180	175	227										0	402
N-6	R0190		14	1									0	15
N-5	R0200			20	80								0	100
N-4	R0210		2,464	1,000	-1,771	-218							-218	1,475
N-3	R0220		10,473	-10	200								200	10,663
N-2	R0230	2	432	420									420	854
N-1	R0240												0	0
N	R0250												0	0
												Total	402	13,665

Gross undiscounted Best Estimate Claims Provisions - Development year (non cumulative absolute amount)

		0	1	2	3	4	5	6	7	8	9	10	Year End (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360
Prior	R0100											117	113
N-9	R0160						425	303	206	140	129		123
N-8	R0170												
N-7	R0180				2,602	1,768	1,436	1,129	1,076				1,053
N-6	R0190			10,776	6,716	4,290	2,752	2,512					2,497
N-5	R0200		21,388	14,809	9,157	5,905	5,425						5,380
N-4	R0210	39,899	24,342	18,259	13,427	12,679							12,543
N-3	R0220	2,138	39,406	27,919	25,814								25,635
N-2	R0230	74,034	48,286	45,180									44,793
N-1	R0240	63,390	53,788										53,279
N	R0250	849											840
												Total	146,256

S.23.01.01 - Own funds (In thousands of USD)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	95,000	95,000			
Share premium account related to ordinary share capital	R0030	0				
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	0				
Subordinated mutual member accounts	R0050	0				
Surplus funds	R0070	0				
Preference shares	R0090	0				
Share premium account related to preference shares	R0110	0				
Reconciliation reserve	R0130	211,691	211,691			
Subordinated liabilities	R0140	0				
An amount equal to the value of net deferred tax assets	R0160	0				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	0				
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230	0				
Total basic own funds after deductions	R0290	306,691	306,691	0	0	0
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	0				
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	0				
Unpaid and uncalled preference shares callable on demand	R0320	0				
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	0				
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	0				
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	0				
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	0				
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	0				
Other ancillary own funds	R0390	0				
Total ancillary own funds	R0400	0			0	0

S.23.01.01 - Own funds (In thousands of USD)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	306,691	306,691	0	0	0
Total available own funds to meet the MCR	R0510	306,691	306,691	0	0	
Total eligible own funds to meet the SCR	R0540	306,691	306,691	0	0	0
Total eligible own funds to meet the MCR	R0550	306,691	306,691	0	0	
SCR	R0580	180,311				
MCR	R0600	45,078				
Ratio of Eligible own funds to SCR	R0620	1.700899356				
Ratio of Eligible own funds to MCR	R0640	6.803597463				

Reconciliation reserve

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	339,191
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	95,000
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	32,500
Reconciliation reserve	R0760	211,691
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	4,481
Total Expected profits included in future premiums (EPIFP)	R0790	4,481

S.25.01.21 - SCR using standard formula (In thousands of USD)

Basic Solvency Capital Requirement

		Gross solvency capital requirement	USP	Simplifications
		C0040	C0090	C0100
Market risk	R0010	123,720		
Counterparty default risk	R0020	26,994		
Life underwriting risk	R0030			
Health underwriting risk	R0040			
Non-life underwriting risk	R0050	79,062		
Diversification	R0060	-53,762		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	176,014		

Calculation of Solvency Capital Requirement

		Value
		C0100
Operational risk	R0130	4,297
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency Capital Requirement excluding capital add-on	R0200	180,311
Capital add-on already set	R0210	
Solvency capital requirement	R0220	180,311
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

S.28.01.01 - MCR (In thousands of USD)

Linear formula component for non-life insurance and reinsurance obligations		MCR components
		C0010
MCRNL Result	R0010	15,979

Background information		Background information	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020		
Income protection insurance and proportional reinsurance	R0030		
Workers' compensation insurance and proportional reinsurance	R0040		
Motor vehicle liability insurance and proportional reinsurance	R0050		
Other motor insurance and proportional reinsurance	R0060		
Marine, aviation and transport insurance and proportional reinsurance	R0070	3,530	3,696
Fire and other damage to property insurance and proportional reinsurance	R0080	4,286	9,964
General liability insurance and proportional reinsurance	R0090	135,415	
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
MCRL Result	R0200	0

Total capital at risk for all life (re)insurance obligations		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	15,979
SCR	R0310	180,311
MCR cap	R0320	81,140
MCR floor	R0330	45,078
Combined MCR	R0340	45,078
Absolute floor of the MCR	R0350	4,064
Minimum Capital Requirement	R0400	45,078