# Solvency and Financial Condition Report

31 December 2021

#### Lloyd's Solvency and Financial Condition Report – 31 December 2021

#### Overview

Lloyd's Solvency and Financial Condition Report (SFCR) as at 31 December 2021 has been prepared in accordance with Article 51 of the Solvency II Directive (2009/138/EC), Articles 290 to 298 of the Commission Delegated Regulation (EU) 2015/35, and Section 3 of the PRA Rulebook Solvency II Firms: Reporting Instrument 2015.

This SFCR is prepared in respect of 'the association of underwriters known as Lloyd's ('Lloyd's'), the supervised undertaking as referred to in Annex III of Directive 2009/138/EC. Further information on the structure of Lloyd's, and the basis of preparation of the SFCR, is described in the Summary.

Lloyd's SFCR contains the quantitative templates as specified by the Commission Delegated Regulation (EU) 2015/2452.

Throughout this document, unless otherwise stated, references to Lloyd's relate to the Lloyd's market; references to the Society and Corporation are in respect of the Society of Lloyd's.

#### Further information

Additional information regarding Lloyd's may be found within Lloyd's Annual Report 2021 and Aggregate Accounts 2021. These reports are available from Lloyd's website: <u>https://www.lloyds.com/about-lloyds/investor-relations/financial-performance/financial-results/full-year-results-2021/downloads</u>

The Lloyd's Annual Report includes the Pro Forma Financial Statements (PFFS), which are prepared so that the financial results of Lloyd's and its members taken together and their net assets can be compared as closely as possible with general insurance companies. The PFFS have been prepared by aggregating audited financial information reported in syndicate returns and annual accounts (Aggregate Accounts), members' funds at Lloyd's (FAL), any central adjustments and the financial statements of the Society of Lloyd's (the Society). The Annual Report also includes the financial statements of the Society of Lloyd's, comprising the financial position and performance of the Corporation of Lloyd's and the Central Fund.

The Aggregate Accounts set out an aggregation of all audited syndicate annual accounts including the audited results for calendar year 2021 and the financial position as at 31 December 2021 of all syndicates which transacted business during 2021.

Where relevant, references to these documents are made in the SFCR.

#### Governing body's statement in respect of the SFCR

We, the Council, acknowledge our responsibility for preparing the SFCR of Lloyd's as at 31 December 2021 in all material respects in accordance with the PRA Rules and Solvency II Regulations as applicable to Lloyd's.

We are satisfied that:

- a) throughout the financial year in question, Lloyd's has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable to Lloyd's; and
- b) it is reasonable to believe that Lloyd's has continued so to comply and will continue so to comply in future.

For and on behalf of the Council

Bard Keen

Bruce Carnegie-Brown, Chairman

Burkhard Keese, Chief Operating Officer and Chief Financial Officer

8 April 2022

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#### Summary

#### What Lloyd's is

Lloyd's is the world's leading insurance and reinsurance marketplace. Through the collective intelligence and risk-sharing expertise of the market's underwriters and brokers, Lloyd's helps to create a braver world.

The Lloyd's market provides the leadership and insight to anticipate and understand risk, and the knowledge to develop relevant, new and innovative forms of insurance for customers globally.

It offers the efficiencies of shared resources and services in a marketplace that covers and shares risks from more than 200 territories, in any industry, at any scale.

And it promises a trusted, enduring partnership built on the confidence that Lloyd's protects what matters most: helping people, businesses and communities to recover in times of need.

Lloyd's began with a few courageous entrepreneurs in a coffee shop. Three centuries later, the Lloyd's market continues that proud tradition, sharing risk in order to protect, build resilience and inspire courage everywhere.

#### Lloyd's Market Structure

#### Members - providing the capital

The capital to underwrite policies is provided by members of Lloyd's. This capital is backed by many of the world's major insurance groups, listed companies, individuals and limited partnerships, with corporate groups providing the majority of the capital for the Lloyd's market.

#### Syndicates - writing the insurance

A Lloyd's syndicate is formed by one or more members joining together to provide capital and accept insurance risks. Most syndicates write a range of classes of business, but many will have areas of specific expertise. Syndicates are, technically, set up on an annual basis. In practice, they usually operate from year to year with members having the right, but not the obligation, to participate in syndicates the following year. This continuity of capital backing the syndicates means they function like permanent insurance operations. Each syndicate sets its own appetite for risk, develops a business plan, arranges its reinsurance protection and manages its exposures and claims.

At 31 December 2021 there were 90 active (i.e. participating on the 2021 year of account) syndicates at Lloyd's including 3 Syndicates In a Box writing innovative new business.

#### Managing agents - managing the syndicates

A managing agent is a company set up to manage one or more syndicates on behalf of the members. Managing agents have responsibility for employing underwriters, overseeing their underwriting and managing the infrastructure and day-to-day operations.

At 31 December 2021 there were 50 managing agents at Lloyd's.

#### Policyholders - transferring risk

Policyholders include businesses, organisations, other insurers and individuals from around the world who seek to mitigate the impact of potential risks. Policyholders may access the Lloyd's market via a broker, coverholder or service company.

#### Brokers – distributing business

Lloyd's is a broker market in which strong relationships, backed by deep expertise, play a crucial part. Brokers facilitate the risk transfer process between policyholders and underwriters. Much of this business involves face to face negotiations between brokers and underwriters.

At 31 December 2021 there were 388 broking firms introducing business to Lloyd's.

#### Coverholders - offering local access to Lloyd's

A managing agent may also authorise third parties to accept insurance risks directly on behalf of its syndicates. These businesses, known as coverholders, form a vital distribution channel, offering a local route to Lloyd's in many territories around the world.

At 31 December 2021 there were 4,054 approved coverholder office locations.

#### Service companies

A service company operates like a coverholder but is a wholly owned subsidiary of either a managing agent or of a managing agent's holding company and which is authorised to enter into contracts of insurance for members of its associated syndicate and/or associated insurance companies.

At 31 December 2021 there were 413 service companies at Lloyd's, with the majority in the UK and the US.

#### Members' agents - supporting the members

Members' agents provide advice and administrative services to members, including assisting with syndicate selection.

At 31 December 2021, there were three members' agents at Lloyd's.

### Society of Lloyd's - supporting the market

The Society oversees the Lloyd's market. It provides the market's infrastructure, including services to support its efficient running, and protects and maintains its reputation.

The Society's role includes:

- managing and protecting Lloyd's network of international licences;
- agreeing syndicates' business plans and evaluating performance against those plans. Syndicates are required to underwrite only in accordance with their agreed business plans. If they fail to do so, Lloyd's can take a range of actions including, as a last resort, stopping a syndicate underwriting;
- monitoring syndicates' compliance with Lloyd's Principles for Doing Business; and
- continuing to raise standards and improve performance across two main areas:
  - o overall risk and performance management of the market; and
  - maintaining and developing the market's attractiveness to capital providers, distributors and clients, while preserving its diversity.

The Society's Executive Committee exercises the day-to-day powers and functions of the Council of Lloyd's.

At 31 December 2021 the Society and its subsidiaries had 1,356 staff.

#### Financial highlights

The Lloyd's market reported an overall profit of £2,277m before tax in 2021 (2020: loss of £887m), with a combined ratio of 93.5% (2020: 110.3%). The underwriting result is a profit of £1,741m (2020: loss of £2,676m), representative of continued improvement in underlying performance, driven by portfolio remediation and favourable market conditions. Net investment income was £948m (2020: £2,268m) and other expenses, net of other income including foreign exchange were £412m (2020: £479m).

	2021	2020
	£m	£m
Underwriting result	1,741	(2,676)
Investment return	948	2,268
Gain / (Loss) on exchange	66	(105)
Other income	91	92
Expenses (other than technical account operating expenses)	(569)	(466)
Total	2,277	(887)

The underwriting profit of £1,741m includes the impact of major claims and benefit from prior year releases. Major claims contributed 11.2% to the combined ratio, significantly less than the 23.0% in 2020, as both the severity and frequency of events were less in 2021; 2020 was also more significantly impacted by COVID-19 losses. Prior year releases benefited the combined ratio by 2.1% (2020: 1.8%), with releases reported across most lines of business, except for the casualty insurance and reinsurance lines which have reported some strengthening. Adjusting for the contribution from major claims, the Lloyd's market reported an underlying combined ratio of 82.3% for the 2021 financial year; a 5.0 percentage point improvement on the 87.3% reported for the 2020 financial year.

The main contributors to the improvement in the underlying combined ratio are the reduction in the attritional loss and expense ratios which stand at 48.9% and 35.5% respectively, representing a 3.0 and 1.7 percentage point reduction from that reported for the 2020 financial year. The improvement in the attritional loss ratio is the result of the market's actions to drive sustainable profitable performance and continuing to sustain risk adjusted rate increases across a number of lines. The improvement in the market's expense ratio, which has reduced to 35.5% from 37.2% in 2020, is predominantly driven by a 2.1 percentage point improvement in the acquisition cost ratio. This is a continuing to be expected from the Future at Lloyd's programme.

Gross written premiums increased 10.6% when compared with 2020, however excluding the impact of foreign exchange – mainly USD weakening against GBP – and growth from new syndicates, premium growth stands at 14.4%. The market has seen a period of sustained risk adjusted rate increases on renewal business, with the 16th consecutive quarter of positive rate movement being reported in the fourth quarter of 2021. Risk adjusted rate increases of 10.9% were reported in 2021 across

all major lines of business and geographies. This was in addition to a net 3.5% increase in business volumes period on period, after allowing for volume growth where syndicates have demonstrated their ability to write business which contributes to sustainable profitable growth.

The market reported net investment income of £948m in 2021, representing an investment return of 1.2% (2020: £2,268m, return of 2.9%). Financial markets over 2021 were again dominated by the COVID-19 pandemic, as new variants caused further lockdowns resulting in market volatility. Equity markets managed a positive return for the year as a whole while fixed income markets fared worse due to rises in Inflation expectations and higher bond yields. The Lloyd's market prudent asset allocation, with the majority of the portfolio held in government bonds, highly rated corporate bonds and cash, supports the delivery of consistently robust returns.

The Lloyd's market continues to be strongly capitalised with total capital, reserves and subordinated loan notes of £36,553m at 31 December 2021, a 7.7% increase from the £33,941m reported at 31 December 2020. The Lloyd's market solvency ratios – both central and market-wide solvency ratios – have strengthened since 31 December 2020. The central solvency ratio has increased to 388% from 209% at 31 December 2020 and the market-wide solvency ratio has increased to 177% from 147% at 31 December 2020. These increases reflect reductions in the SCRs (driven by the modelled benefits of the Central Fund cover and refinements in the modelling of syndicate risks), and increases in the eligible assets.

During 2021, Lloyd's purchased cover for the Central Fund, which will increase the resilience of the Lloyd's market by further strengthening our capital position and commitment to pay claims and support further sustainable profitable growth across the Lloyd's market. The benefits of the cover have been taken account of in the Central Solvency Capital Requirement which has reduced from £2,085m as at 31 December 2020 to £1,250m as at 31 December 2021.

#### Post-balance sheet events

The Russian invasion of Ukraine will have short, medium, and long-term impacts on Lloyd's performance and balance sheet. The primary sources of risk relate to underwriting exposure arising from sanctions, exposure within investment portfolios and the impact on operations.

There is a high degree of uncertainty around the eventual outcomes at this point and we continue to monitor the situation closely. Lloyd's direct premium derived from Russia and Ukraine is less than 1% of total GWP. Indirect underwriting exposures arise mainly across the aviation, marine, trade credit and political risk lines of business. Our assessment of the potential financial impact is ongoing and we are actively working with the Lloyd's market to continue our assessment of the situation.

We are also working closely with governments and regulators across the world to ensure we interpret and enact sanctions requirements at pace, together with other legal and regulatory obligations.

Our investments and assets under management are largely fixed income and our strategic asset allocation has limited direct exposure to the crisis; our indirect exposures are also minimal and both direct and indirect exposures account for less than 1% of total invested assets across the chain of security. The situation is fast evolving, and in order to respond swiftly to developments, we have set up an executive response group that meets daily to monitor the situation and respond to

government actions. The group is continually assessing the operational impact upon the Society and Lloyd's market and remains in close consultation and communication with market participants.

At this early stage, it is difficult to assess the full financial impact of this crisis, however there are no indications that this will impact the Lloyd's market or Society of Lloyd's ability to satisfy regulatory capital requirements or meet their financial obligations.

#### Lloyd's risk profile

At Lloyd's, the risk profile originates from both syndicates and at central level.

Syndicates are the source of the majority of risks. They source all the insurance business; manage the bulk of the asset portfolios; hold the majority of the counterparty exposures; and conduct most of the day-to-day operational activity. The syndicate risks include: insurance risk (underwriting, reserving and catastrophe risk); market risk on syndicate assets (including credit risk on Premiums Trust Funds (PTF)); reinsurance and other credit risk; and syndicate operational risk.

At the central level, additional risks arise from central operational risk, pension fund risk; market risk on central assets; and the risk of member default.

#### Solvency Capital Requirement (Solvency II basis)

The Solvency Capital Requirement (SCR) represents the amount of capital required to withstand up to 1 in 200-year losses over a one-year time horizon. Given Lloyd's unique structure there are two SCRs which are monitored under the Solvency II regime:

- The Lloyd's market wide SCR (MWSCR) is calculated to cover all the risks of 'the association of underwriters known as Lloyd's', i.e. those arising on syndicate activity, members' capital provided at Lloyd's and the Society taken together, at a 99.5% confidence level over a one-year time horizon as provided for in Solvency II legislation. All the capital of the component parts of the market taken together is available to meet the MWSCR.
- The Lloyd's central SCR (CSCR) is calculated in respect of only the risks facing the Corporation and the Central Fund at the same confidence level and time horizon used to calculate the MWSCR. The material risk is that members do not have sufficient funds to meet their underwriting losses even having complied with Lloyd's rigorous capital setting rules.

Individual syndicates are also required to calculate a SCR, at a 99.5% confidence level over both a one-year and an ultimate horizon, for each underwriting year. The ultimate basis drives the determination of member level capital and each member's SCR is derived as the sum of the member's share of the syndicate's ultimate SCR. Where a member participates on more than one syndicate, a credit for diversification is provided to reflect the spread of risk. The MWSCR and CSCR are derived from the Lloyd's Internal Model which has been approved by the PRA.

Individual syndicates also derive SCRs from their own internal models which are subject to approval by the Lloyd's Capital and Planning Group. The appropriateness of each syndicate's internal model, including changes thereto and the reasonableness of the key assumptions are assessed as part of the Society's oversight of the Lloyd's market.

#### Lloyd's Internal Model

The approved Lloyd's Internal Model (LIM) is a purpose-built model designed to calculate the MWSCR and CSCR as required under Solvency II. It covers all risk types and all material risks for the aggregation of syndicates as well as for the Society, allowing for the unique capital structure of Lloyd's. The LIM consists of three main components: the Lloyd's Investment Risk Model (LIRM) which simulates economic variables and total assets returns; the Lloyd's Catastrophe Model (LCM) which models catastrophe risk; and the Capital Calculation Kernel (CCK) which is the main element of the LIM where all other risks are simulated, and all risks are combined.

Syndicates calculate their own SCR however the market wide and central capital requirements are derived from Lloyd's parameterisation at a whole market level to build a view of total market capital requirements from the ground up using market level assumptions. The LIM uses a methodology whereby losses from insurance and other risks are simulated by class of business, allocated to syndicates and through to members to assess the level of capital required by the market and centrally to meet up to 1 in 200-year losses over the one-year time horizon.

A Major Model Change Application was approved in December 2021.

#### Lloyd's solvency ratios and capital

	Dec 2021	Dec 2020
	£m	£m
Market wide solvency		
Lloyd's MWSCR	19,900	20,341
Eligible capital	35,203	29,860
Lloyd's solvency ratio	177%	147%
Central solvency		
Central SCR	1,250	2,085
Eligible central capital	4,855	4,361
Lloyd's central solvency ratio	388%	209%

Lloyd's solvency position is summarised below:

The market wide solvency ratio at 31 December 2021 is 177% (2020: 147%). The solvency ratio has improved in 2021 as a result of a reduction in the SCR due to a Major Model Change Application; and an increase in assets due to increased profitability, greater Funds At Lloyd's and higher discount rates driving lower technical provisions.

The central solvency ratio at 31 December 2021 is 388% (2020: 209%). The improvement is driven by a decrease in the SCR following the PRA's approval of Lloyd's Major Model Change Application, due to the impact of the Central Fund cover. Additionally, there was an increase in the callable layer (see page 13), with members' premium limits being increased to 5% from 3%. This is offset by an eligibility restriction to own funds due to the reduction in the SCR.

A summary of Lloyd's market wide capital ('own funds') by tier is set out below.

31 December 2021	Tier 1	Tier 2	Tier 3	Total
	£m	£m	£m	£m
Syndicate assets	704			704
Members' funds at Lloyd's (FAL)	24,491	6,789		31,280
Society assets:				
Subordinated debt		871		871
Deferred tax			101	101
Balance of net assets	2,247			2,247
Total own funds available to meet the SCR	27,442	7,660	101	35,203
Lloyd's SCR				19,900
'Excess' own funds not eligible to meet SCR	-	-	-	-
Total market wide own funds eligible to meet the SCR	27,442	7,660	101	35,203
Lloyd's market wide solvency ratio				177%

31 December 2020	Tier 1	Tier 2	Tier 3	Total
	£m	£m	£m	£m
Syndicate assets	(4,218)			(4,218)
Members' funds at Lloyd's (FAL)	24,372	6,576		30,948
Society assets: Subordinated debt Deferred tax Balance of net assets	2,109	919	102	919 102 2,109
Total own funds available to meet the SCR	22,263	7,495	102	29,860
Lloyd's SCR				20,341
'Excess' own funds not eligible to meet SCR	-	-	-	-
Total market wide own funds eligible to meet the SCR	22,263	7,495	102	29,860
Lloyd's market wide solvency ratio				147%

The eligibility of assets to count towards the solvency coverage is subject to tiering restrictions. All Tier 1 assets count fully towards the solvency coverage assessment. However, Tier 2 and Tier 3 assets are only eligible up to a maximum of 50% of the SCR. A significant portion of the members' FAL are in the form of letters of credit (LOCs), which are classified as Tier 2 assets under Solvency II. At 31 December 2021 the amount of ineligible Tier 2 and Tier 3 capital was £nil (2020: £nil).

These LOCs are callable on demand and when called, the proceeds, namely cash, would qualify as Tier 1 assets. Under these circumstances, any amounts previously restricted would become fully eligible.

The central own funds available to cover the central SCR are summarised below:

31 December 2021	Tier 1	Restricted Tier 1	Tier 2	Tier 3	Total
	£m	£m	£m	£m	£m
Society assets:					
Subordinated debt			871		871
Deferred tax				101	101
Balance of net assets	2,240	385			2,625
Callable layer*	1,605				1,605
Total central own funds available to meet the SCR	3,845	385	871	101	5,202
Central SCR*					1,250
'Excess' central own funds not eligible to meet central SCR	-	-	(246)	(101)	(347)
Total central own funds eligible to meet the SCR	3,845	385	625	-	4,855
Central solvency ratio					388%

31 December 2020	Tier 1	Restricted Tier 1	Tier 2	Tier 3	Total
	£m	£m	£m	£m	£m
Society assets: Subordinated debt Deferred tax Balance of net assets	2,107	416	919	102	919 102 2,523
Callable layer*	817				817
Total central own funds available to meet the SCR	2,924	416	919	102	4,361
Central SCR*					2,085
'Excess' central own funds not eligible to meet central SCR	-	-	-	-	-
Total central own funds eligible to meet the SCR	2,924	416	919	102	4,361
Central solvency ratio					209%

#### Callable layer

The Society has the right to make a call on members of up to 5% of members' premium limits ("callable contributions"). The callable contributions can be drawn from members' premiums trust funds without the members' consent. This would result in the transfer of Tier 1 capital from syndicate funds to central resources. The value assigned to the callable layer has been reduced to reflect that part of the callable layer which would not be available in a stressed situation at the central SCR level of confidence. The callable layer has been increased to 5% from 3% for the 2022 and subsequent years of account.

#### Syndicate loans to the Central Fund

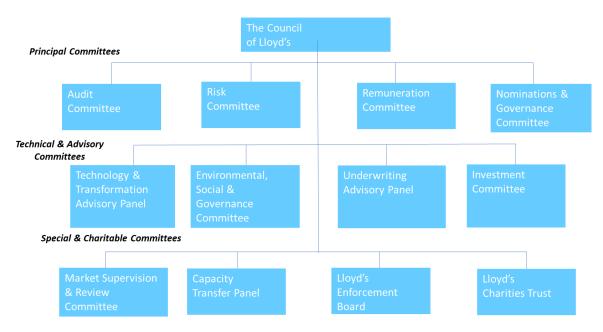
During 2019 and 2020 the Society issued capital in the form of syndicate loans to the Central Fund ("syndicate loans") from members participating on the 2019 and 2020 years of account. This gives rise to total restricted Tier 1 capital of £385m as at 31 December 2021 (2020: £416m).

#### Coverage of the central SCR with eligible central own funds

The capital tiering rules also apply to the coverage of the central SCR. The inclusion of the Tier 2 subordinated debt increases Lloyd's Tier 2 and 3 central capital by  $\pounds$ 972m. Up to  $\pounds$ 625m - 50% of  $\pounds$ 1,250m - of this is eligible in the solvency calculation.

#### Lloyd's governance structure

The structure of the principal governing bodies of Lloyd's is summarised in the chart below:



#### The Council of Lloyd's

Under Lloyd's Act 1982, the Council of Lloyd's undertakes the management and superintendence of the affairs of the Society and has the power to regulate and direct the business of insurance at Lloyd's. The Council is responsible for the day-to-day oversight of Lloyd's and thus constitutes Lloyd's Administrative, Management or Supervisory Body (AMSB).

#### Basis of preparation of the SFCR

The basis of preparation of the Lloyd's SFCR has been selected so that the financial position of Lloyd's is presented on a basis to most appropriately reflect the structure of Lloyd's.

The SFCR includes the aggregate of returns submitted from syndicates (the relevant 'Lloyd's templates' as referred to in the PRA Rulebook Solvency II Firms: Reporting Instrument 2015' (PRA 2015/23)), members' Funds at Lloyd's (FAL) and in respect of the Society of Lloyd's, including the Corporation and Central Fund.

The Lloyd's templates report the Pillar 3 information for calendar year 2021 and the financial position at 31 December 2021 for all syndicates which transacted business during the year. The data therein which contributes to the section of the SFCR subject to reasonable assurance is the subject of an audit opinion by the auditor of each syndicate.

The capital provided by members is generally held centrally as FAL. The data included within the SFCR in relation to FAL is provided by the Corporation. The data therein which contributes to the SFCR is the subject of a reasonable assurance engagement by PwC as the auditor of Lloyd's.

Data in respect of the Society of Lloyd's is also provided by the Corporation. Again, the data therein which contributes to the SFCR is the subject of a reasonable assurance engagement by PwC.

The balance sheet (S.02.01) and summary of own funds (S.23.01) in the SFCR aggregate the assets held at syndicate level, members' assets held as FAL and the central resources of the Society. Overall, the SFCR aggregates the results and resources of the Society and its members. The SFCR may, therefore, be used as a reasonable presentation of the results and state of affairs of the Lloyd's market on a basis that is as closely as possible comparable with general insurance companies.

#### A. Business and Performance

#### A.1 Business

Name and legal form of undertaking

Lloyd's is a society incorporated by the Lloyd's Act 1871, whose principal place of business is at One Lime Street, London EC3M 7HA.

The 'association of underwriters known as Lloyd's' is the legal form of the undertaking as defined in Annex III of the Solvency II Directive (2009/138/EC).

Supervisory authority responsible for financial supervision

The supervisory authority of Lloyd's is the Prudential Regulation Authority (PRA), which was created as part of the Bank of England by the Financial Services Act (2012). The registered office of the PRA is as follows:

Prudential Regulation Authority 20 Moorgate London EC2R 6DA

External auditor of the undertaking The independent auditors of Lloyd's are:

PricewaterhouseCoopers LLP Chartered Accountants 7 More London Riverside London SE1 2RT

<u>Holders of qualifying holdings of the undertaking</u> There are no qualifying holdings applicable to Lloyd's.

<u>Legal structure of group</u> Lloyd's does not belong to a group.

<u>Material lines of business and geographical areas</u> Lloyd's writes a wide range of classes of business in a variety of geographical areas.

Significant events during the reporting period Major claims for the market were £2,989m in 2021 (2020: £5,967m), net of reinsurance and including reinstatements payable and receivable.

Major losses for 2021 have arisen from three major Catastrophe events: Hurricane Ida, US Winter Storm Uri and the European Floods, with losses concentrated in property (D&F) and property treaty lines. COVID-19 estimates have remained stable and have had no impact in the current year. 2021 also saw a decrease in the frequency of catastrophe loss activity, with the Lloyd's market suffering insured losses from less than half the number of events experienced in 2020.

During the year, the Society entered into arrangements and other connected transactions with Constellation IC Limited (Constellation) and a panel of other insurers, to provide protection for Lloyd's Central Fund, in situations where the Central Fund makes payments to cover members' liabilities. Constellation is an incorporated cell of White Rock Insurance (Guernsey) ICC Limited and both entities

are registered and domiciled in Guernsey and authorised by the Guernsey Financial Services Commission. The Society has no shareholding interest in either of the entities. The programme incepted on 1 January 2021 and has an initial fixed duration of five years (with a possible extension to hold collateral for up to a further three years to cover adverse claims development). The Society retains the first £600m of claims payable. The total amount of cover provided by the programme is £650m, with layers provided by Constellation and a panel of reinsurers. The layer covered by Constellation of £450m is 100% collateralised for the five year term. Constellation has been funded by loans, including £80m from the Society. The loan is classified and measured at fair value through profit and loss, in accordance with the Society's accounting policy for financial assets in accordance with IFRS 9 Financial Instruments. Interest income is accrued on the loan.

#### A.2 Underwriting performance

The Lloyd's marketresult for 2021 is described and analysed in detail in pages 18 to 28 '2021 Highlights' of Lloyd's Annual Report 2021. This provides a qualitative and quantitative description of the result at an aggregate level and by material line of business.

The overall underwriting result is summarised below:

	2021	2020
	£m	£m
Net premiums earned	26,657	25,876
Net claims incurred	(15,440)	(18,929)
Net operating expenses	(9,476)	(9,623)
Total	1,741	(2,676)
Combined ratio	93.5%	110.3%

The underwriting result by material line of business is summarised below:

	2021	2020
	£m	£m
Reinsurance	489	(656)
Property	336	(2,104)
Casualty	(17)	(688)
Marine, aviation & transport	388	239
Energy	71	79
Motor	35	48
Life	13	(7)
Sub-total	1,315	(3,089)
Transactions between syndicates and the Society	426	413
Total	1,741	(2,676)

An analysis of the underwriting performance is provided in 'financial highlights' on pages 8 and 9.

#### A.3 Investment Performance

The investment performance for Lloyd's for 2021 is summarised below:

	2021	2020
	£m	£m
Interest and similar income:		
From financial investments designated as at fair value	1,444	1,608
though profit or loss		
From available for sale investments	30	32
Dividend income	27	22
Interest on cash at bank	26	29
Other interest and similar income	(8)	21
Investment expenses	(53)	(52)
Total	1,466	1,660
Other income from investments designated as at fair value		
through profit or loss:		
Net realised (losses)/gains	(102)	188
Net unrealised (losses)/gains	(411)	394
Other relevant income	(5)	26
Total	(518)	608
Total investment return	948	2,268

The market reported net investment income of £948m in 2021, representing an investment return of 1.2% (2020: £2,268m, return of 2.9%).

Financial markets over 2021 were again dominated by the COVID-19 pandemic, as new variants caused further lockdowns resulting in market volatility. Equity markets managed a positive return for the year as a whole while fixed income markets fared worse due to rises in Inflation expectations and higher bond yields. The Lloyd's market prudent asset allocation, with the majority of the portfolio held in government bonds, highly rated corporate bonds and cash, supports the delivery of consistently robust returns.

Net losses on investments of £14m (2020: gains of £12m) were recognised directly in equity.

Lloyd's has limited exposure to securitised assets and other asset backed securities throughout the Chain of Security. As at 31 December 2021, exposure to these assets totalled £5,205m (2020: £4,883m).

#### A.4 Performance of other activities

Other items contributing to the overall profit of £2,277m (2020: loss of £887m) were gains on exchange of £66m (2019: losses of £105m) and other income of £91m (2019: £92m), less other expenses of £569m (2019: £466m). Other income related primarily to Society income, largely market charges and charges to members. The other expenses were primarily in respect of Society operating expenses, for which the increase was driven by the investment in initiatives such as Future at Lloyd's and other strategic programmes.

#### <u>Leases</u>

Payments made under operating leases are charged to the Society income statement on a straight-line basis over the period of the lease. Contractual capital expenditure is provided for over the term of the underlying lease agreement. The lease cost provision is an accounting estimate which arises due to the fact the Society has entered into a number of fully repairing leases.

Additional information on lease cost provisions and operating lease commitments for the Society is set out in notes 16 and 25 of the Society accounts at pages 155 to 157 and 168 of Lloyd's Annual Report 2021 respectively.

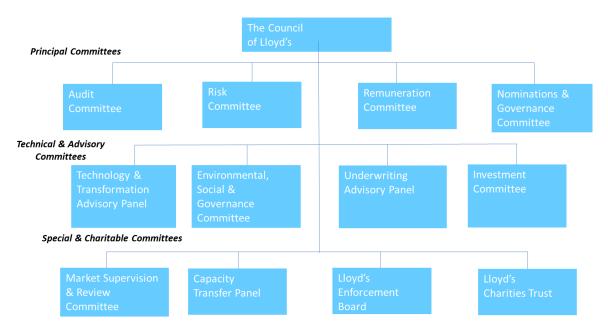
#### A.5 Any other information

There is no other material information to disclose.

#### В System of Governance

#### **B.1** General information on the system of governance

<u>Structure, roles and responsibilities</u> The structure of the principal governing bodies of Lloyd's is summarised in the chart below:



#### The Council

Under Lloyd's Act 1982, the Council undertakes the management and superintendence of the affairs of the Society and the power to regulate and direct the business of insurance at Lloyd's.

The Council comprises a maximum of 15 members, split between three working, three external, six independent nominated members and three executive nominated members. The current Council membership comprises of 15 members with 3 executive members.

The Chairman and Deputy Chairmen are elected annually by the Council from among its members.

Certain functions are reserved to the Council including:

- The making, amendment or revocation of byelaws (which are available at • www.lloyds.com/byelaws);
- The setting of the Corporation budget; •
- The setting of Central Fund contribution rates; •
- Appointing the Chairman and Deputy Chairmen of Council; •
- Approving Lloyd's risk appetite;
- Permitting a company to act as a managing agent; and •
- Setting society level capital requirements.

Beyond the reserved functions, the Council can delegate its powers or functions to any person, committee or employee of the Society.

The Council has responsibility for the day-to-day management of the market. The Council has delegated authority to carry out specified functions to committees, including the Remuneration and Nominations & Governance Committees and the Executive, as summarised below.

#### Main Committees of the Council

#### Nominations & Governance Committee

The Nominations & Governance Committee is responsible for keeping under review the governance arrangements and leadership needs of the Society and its subsidiaries. Its functions include making recommendations to the Council on the appointment of the Chairman, Chief Executive Officer, new nominated Council members, key members of the Executive, members of Council committees and the Secretary to the Council. The Committee is also responsible for succession planning arrangements for these positions. The Committee seeks to ensure that the Council and its committees have a combination of skills, experience and knowledge. For further information on the skills, experience and knowledge of the Council members, please see <a href="https://www.lloyds.com/about-lloyds/governance-andmanagement/council-of-lloyds">https://www.lloyds.com/about-lloyds/governance-andmanagement/council-of-lloyds</a>.

The Committee is chaired by the Chairman of Lloyd's and its remaining members are drawn from the Council. No executive member of the Council is eligible to be a member of the Committee.

The Nominations & Governance Committee reports to the Council on its proceedings after each meeting on all matters relating to its duties and powers. A written report is submitted to the Council annually.

#### **Remuneration Committee**

The Remuneration Committee is responsible for setting remuneration arrangements for the Chairman, Chief Executive Officer, the Executive Directors and any other direct reports of the Chief Executive Officer and any such other members of the executive management or other persons as it is designated to consider.

Non-Executive remuneration is decided by the Council, on recommendation from the Chairman and Chief Executive Officer, who may consult the Remuneration Committee as part of that process. The levels of remuneration for each position reflects the time commitment and responsibilities of each role.

Until 31 October 2021 the Remuneration Committee was chaired by Andy Haste. Since that date the Committee has been chaired by Fiona Luck. The Chairman is a member of the Committee and its remaining members are drawn from the nonexecutive members of the Council. No executive member of the Council is eligible to be a member of the Committee.

The Remuneration Committee reports to the Council on its proceedings after each meeting, and on all matters relating to its duties and powers and makes recommendations to the Council on any area within its remit where action or improvement is needed.

The Remuneration Committee submits a written report to the Council annually.

#### Technology & Transformation Committee

The TTC's remit covered oversight of the Future at Lloyd's programme. Until 31 October 2021 the TTC was chaired by Andy Haste. From 1 November 2021 until the closure of the TTC on 23 March 2022, the TTC was chaired on an interim basis by Bruce Carnegie-Brown. TTC's remaining members comprised Council members, market representatives, external subject matter experts, and Corporation Executives. The TTC reported to the Council on its proceedings after each meeting and submitted an annual activity report to the Council.

As the Future at Lloyd's programme moves firmly into the crucial and adoption phase of Blueprint Two; and following the announcement of a new operational structure in place for the programme, the governance structures in place to oversee the programme were also refreshed at the start of 2022. Tailored structures to maximise market engagement have been integrated into the programme, including the Data Council and the Technology & Transformation Board, and a new Joint Delivery Advisory Committee ('JDAC') was created to ensure a joined-up approach to communications, delivery and adoption strategies for the market. The JDAC is chaired by Lloyd's Market Transformation Director, and its members include the Chair plus representatives of the LMA, PPL, IUA, LIIBA and the Future at Lloyd's programme. Following the creation of the JDAC, the Council took the decision to close the TTC with effect from 23 March 2022, with the Council taking a more direct role in overseeing the delivery of the Future at Lloyd's programme. To support the Council, a new Technology & Transformation Advisory Panel ('TTA') was established, comprising of senior market practitioners drawn from both the underwriting and broking communities to enable the sharing of market insights into developments in the delivery of the programme.

#### Audit Committee

The Audit Committee's role is to assist the Council in discharging its responsibilities for monitoring the integrity of the Society's financial reporting, assessing the effectiveness of the systems of internal control of the Society and monitoring the effectiveness, independence and objectivity of the internal and external auditors. The Committee's functions in 2021 included reviewing the Society's and the market's Pro Forma annual and interim financial statements, the syndicate aggregate accounts and the Lloyd's Solvency and Financial Condition Report to the PRA.

The Audit Committee is chaired by Angela Crawford-Ingle, an independent nominated member of the Council. The other members of the Committee are drawn from the Council. No Executive Director of the Council is eligible to be a member of the Committee. The Chief Executive Officer, Chief Risk Officer, Chief Financial Officer, the Head of Internal Audit, senior managers, and the external auditor attend the meetings as appropriate. The Chairman also attends meetings by invitation.

Reports from the internal and external auditors are reviewed by the Audit Committee and appropriate action is taken in response.

The Audit Committee submits an annual report to the Council. It also reports to the Council on its proceedings after each meeting. Additional reports are submitted to the Council on matters of material interest as and when necessary.

#### **Risk Committee**

The Risk Committee's role is to assist the Council in its oversight of the identification and control of risks to the objectives of Lloyd's. In carrying out the role, the Committee takes into account the relevant work of the Investment Committee, the TTC and the Audit Committee. The Risk Committee is chaired by Neil Maidment, an independent nominated member of the Council. The other members of the Committee are drawn from the Council. The Chief Executive Officer, Chief Risk Officer and Chief Financial Officer are regular attendees, with others invited to attend all or part of any meeting as and when deemed appropriate.

The Committee submits an annual report to the Council. It also reports to the Council on its proceedings after each meeting.

#### Market Supervision and Review Committee

The Market Supervision and Review Committee (MSARC) takes decisions regarding the exercise of the Society's enforcement powers. It also acts as a review body capable, where appropriate, of amending, modifying or withdrawing certain decisions taken by the executive affecting managing agents. It also acts as the body that determines whether certain decisions can be referred to the Lloyd's Appeal Tribunal and can also make certain business decisions.

MSARC submits a written report to the Council annually and may submit additional reports where appropriate. The members of MSARC are appointed by the Council and are neither Council members, nor employees of the Society. MSARC is chaired by a qualified lawyer.

#### **Capacity Transfer Panel**

The Capacity Transfer Panel ('the Panel') was established principally to exercise the Council's powers in relation to syndicate minority buyouts and mergers. The Panel meets at the discretion of its Chairman. The Panel submits a written report to the Council annually and may submit additional reports on matters of material concern as and when necessary.

The members of the Panel are appointed by the Council. Until 31 October the Panel was chaired by Andy Haste, an independent nominated member of Council. Since 1 November 2021, the Panel has been chaired by Neil Maidment, also an independent nominated member of Council. Other members of the Panel are neither Council members, nor employees of the Society.

#### **Investment Committee**

The Investment Committee recommends to the Council the investment objectives and parameters of centrally managed assets and is responsible for reviewing performance against these. In addition, it monitors the investment operations of the Treasury and Investment Management department in respect of all funds under its management and approves all investment counterparties. It may also make more general recommendations concerning investment activity at Lloyd's.

The Investment Committee submits a written report to the Council annually and may submit additional reports on matters of material concern as and when necessary. The Committee is required to obtain the approval of the Council before making any decisions which may materially affect the financial risks applying to the Society or Lloyd's market entities.

The members of the Committee are appointed by the Council. The Committee is chaired by Karen Green. The Chief Executive Officer, the Chief Investment Officer and Chief Financial Officer are members of the Committee. The remaining members

are external subject matter experts who are neither Council members nor employees of the Society.

#### Culture Advisory Group ('CAG')

The CAG was established as part of the Society's response to the Market Culture Survey conducted in 2019. The CAG's role was to provide thought leadership, advice and guidance on delivering the actions agreed by the Council to ensure improvement of the culture across the Lloyd's market. During 2021 the CAG submitted a written report to Council each quarter.

The CAG was chaired by Fiona Luck, an independent nominated member of the Council. Its remaining members were: a working member of Council; the Chief Human Resources Officer; representatives from the Lloyd's market and external subject matter experts. The CAG's members were appointed on behalf of the Council.

<u>The Environmental, Social & Governance Advisory Group ('ESG')</u> The ESG's role was to provide advice to the Council and the Executive to enable Environmental, Social and Governance integration for the Lloyd's market.

The ESG was chaired by the Chairman of Lloyd's. The Chief Risk Officer and Chief Marketing and Communication Officer were members of the Group. The remaining members were drawn from Council; representatives of the Corporation; subject matter experts; and representatives of the Lloyd's Market with relevant experience.

## Material changes in the system of governance that have taken place over the reporting period

Various appointments were made throughout 2021 to the Council and its Committees, including the appointment of Lord Mark Sedwill as Senior Independent Deputy Chairman (upon the departure of Andy Haste). For further information, please refer to the Lloyd's Annual Report 2021, Corporate Governance Report, pages 67-81).

With effect from 1 January 2022, the CAG and ESG Advisory Groups were merged to create the ESG Committee. The merger was undertaken to align the managing, monitoring and reporting on the Corporation's and Market's ESG policies. The ESG Committee is Chaired by the Senior Independent Deputy Chairman of Lloyd's. The remaining members are largely drawn from the CAG and ESG Group and comprise: two Council members; two Market Representatives; four Subject Matter Experts; and four Executive members.

The Council took the decision to close the TTC with effect from 23 March 2022 (please see above for further detail).

#### Information on the remuneration policy

#### Principles of the remuneration policy

Lloyd's operates a Total Reward approach to remuneration, which is designed to meet employee and Society needs by providing rewards that are linked to individual performance and the delivery of the Society's objectives.

Lloyd's Total Reward approach is supported by the following practices:

• The approach looks beyond base salary to the value of the total reward package in meeting the needs of employees;

- Lloyd's recognises and rewards superior performance; and
- Lloyd's remuneration practices are designed to promote and reward sound and effective risk management.

The Society operates a balanced approach to performance measurement. The annual performance bonus is linked to Lloyd's key strategic objectives and KPIs are set each year which support the delivery of Lloyd's long-term vision. Lloyd's Market Award Bonus is directly linked to the profitability of the Lloyd's market to encourage an attitude of commercial partnership with the market and align the interests of participants with capital providers.

#### The Society's executive remuneration policy

The structure of total compensation for the CEO and executive directors is designed to support the strategic priorities and reflect the market oversight role of the Society.

Lloyd's reward policy is designed to facilitate the future success of the Society by ensuring that the executive package may be sufficient to attract executive directors of the calibre required to deliver the Society's strategic priorities. It seeks to ensure that no more than is necessary is paid on recruitment, while taking into account a highly competitive and global market for talent.

All of Lloyd's executive remuneration practices are designed to protect the brand and reputation of Lloyd's and to promote sound and effective risk management. Incentives (annual performance bonus, market award and for 2021 and 2022 a Transformation Incentive Plan) are subject to a potential downward adjustment if risk management practices and standards are not considered to have been sufficiently met.

To ensure the long-term sustainability of the Lloyd's brand and reputation, the Society operates malus and clawback provisions on all incentives to ensure that senior executives act responsibly and in the long-term interests of the Society.

#### Summary of executive remuneration policy for 2021

Salary - Salaries are set to appropriately recognise responsibilities and be broadly market competitive. For 2021, salaries are set as follows: CEO: £663,000; Chief Financial Officer: £475,000; and Chief of Markets: £500,000 (from his appointment on 4 May 2021).

Lloyd's Incentive Plan comprises of individual performance and market elements. In addition, for 2021 and 2022, a Transformation Incentive Plan also operates for a group of key roles who are critical to the successful execution of the ambitious Blueprint Two programme.

Lloyd's Individual Performance Bonus - The discretionary annual bonus links reward to specific and measurable targets aligned with Lloyd's strategy. For 2021, annual bonus maximums (as a % of salary) for the CEO, Chief Financial Officer and Chief of Markets are 100%. Annual bonus awards are subject to a 'risk underpin'. The Remuneration Committee will assess performance against risk and compliance metrics and may apply a downward adjustment where appropriate.

Lloyd's market award bonus - this offers an incentive which is directly linked to the profitability of the Lloyd's market. In order to provide a balanced approach to performance measurement and reflect the focus of the Society and its drive for improved efficiencies and transformation in the Lloyd's market, Profit Before Tax (PBT) and Combined Operating Ratio (COR) are key metrics used to measure

market performance. For the CEO and executive directors, a maximum cap of 50% of salary applies and awards are subject to a 'risk underpin'. The Remuneration Committee will assess performance against risk and compliance metrics and may apply a downward adjustment where appropriate.

A portion of the combined total award may be deferred for three years, to meet the PRA guidance to defer at least 40% of total variable pay.

Transformation Incentive Plan – awards are made to a group of key roles who have a material impact on the development and execution of the Future at Lloyd's strategy. Performance metrics are directly aligned to

the success of the Blueprint Two programme. Lead indicators will be underpinned by profitability and financial strength of the Lloyd's marketplace. Vesting may be deferred by 12 months and the underpin tests reapplied in the following year, in the event that performance underpins are not met.

Current individual maximum awards are 100% of salary for Executive Directors. Awards will be made in 2022 and 2023, and will be performance tested and vest following 31 December 2022 and 31 December 2023 respectively. Payment of any vested awards will be made in three tranches in the three years following the end of the performance period, subject to employment at the time of vesting; and awards will be subject to Lloyd's malus and clawback provisions, and the risk underpin adjustment applicable to the Lloyd's Incentive Plan.

Pension - The CEO, CFO and Chief of Markets are eligible to be members of the Group Personal Pension (GPP) Plan (or equivalent), which is a defined contribution plan. All executive directors receive a cash allowance of 15% of base salary which is in line with the pension available to the wider workforce.

#### Variable components of remuneration for all Society employees

Lloyd's variable component of remuneration consists of the following elements within one bonus framework:

- individual performance bonus
- market performance award bonus

#### Individual performance bonus

The annual bonus is a discretionary annual bonus plan which links reward to specific and measurable targets aligned with Lloyd's strategy. All Society employees are eligible for a discretionary annual bonus, based on performance against objectives and individual key performance indicators for the year.

Any employee who performs below role expectations will not receive an individual performance bonus.

#### Market performance bonus

The market element bonus is available to all employees and has been designed to meet strategic objectives by enabling the Society to offer an incentive which is directly linked to the profitability of the Lloyd's market and will therefore encourage an attitude of commercial partnership with the market and align the interests of participants with capital providers; and will provide a competitive reward and therefore assist Lloyd's in attracting and retaining the talented individuals required to develop and support future strategy.

Awards are calculated by reference to profit on ordinary activities before tax (PBT), as reported in the pro forma financial statements in the Lloyd's Annual Report for

each financial year, and Combined Operating Ratio (weighted equally) for each financial year subject to minimum threshold levels.

Deferred pay components are included within the remuneration provision under the market award bonus as an additional incentive to encourage employee recruitment and retention.

No market award bonus will be paid to individuals rated as 'inconsistent performers' or those who are performing below role expectations.

In addition in 2021 and 2022 the Transformation Incentive Plan applies to a group of key roles who are critical to the successful execution of the Blueprint Two programme.

## Remuneration for the Chairman and members of the Council of Lloyd's and Board who are not employees of the Society

The current Lloyd's Chairman was appointed effective 15 June 2017 and his fee was £600,000 per annum. The Chairman was reappointed for a further three year term from 1 June 2020 and acknowledging that no fee increase had been awarded since 2017, as well as the scope and time commitment of the role, the fee was increased to £630,000 effective from 1 April 2021. Council members are paid £62,500 per annum. Fees are also payable in respect of membership of a number of Council committees. Additional fees are payable for the Senior Independent Deputy Chairman and Deputy Chair positions.

Further information on Lloyd's remuneration policy is set out in pages 82 to 94 of Lloyd's Annual Report 2021.

<u>Material transactions during the reporting period with persons who exercise a</u> <u>significant influence on the undertaking, and with members of the administrative,</u> <u>management or supervisory body</u> There were no relevant material transactions during the reporting period.

#### B.2 Fit and proper requirements

#### Requirements for skills, knowledge and expertise

Lloyd's has a regulatory obligation to ensure that all relevant persons remain fit and proper at all times, in accordance with the requirements of the Senior Managers and Certification Regime ("SM&CR").

The Lloyd's Fit and Proper Policy sets out the steps which Lloyd's will take to assess an individual's fitness and propriety against the following considerations:

- honesty, integrity and reputation;
- competence and capability;
- financial soundness; and
- personal characteristics.

Where disciplinary action has been taken against a person within scope of SM&CR, the policy considers the impact on the assessment of the person's fitness and propriety. The requirement to notify the PRA and FCA when disciplinary action has been taken against a person for a Conduct Rule breach is outlined in the policy.

The following individuals are within scope of the Fit and Proper policy:

- all persons carrying out a Senior Manager Function;
- all persons carrying out a Certified Function;
- notified Non-Executive-Directors;
- any other Key Function Holder ("KFH"); or
- anyone carrying out an activity which has the potential to cause significant harm.

In relation to the Council, the Nominations & Governance Committee is responsible for recommending appointments for Nominated members of the Council.

Given that 6 of the 15 members of Council are required by Lloyd's Act 1982 to be elected by members of the Society it is not possible or appropriate for the Nominations & Governance Committee to have specific obligations in respect of the balance of expertise and experience represented on Council. However, the Committee conducts an at least annual review of the structure, size and composition (including skills, knowledge & experience) of the Council. Before making any recommendation regarding candidates for appointment the Nominations & Governance Committee uses its best endeavours to evaluate the balance of skills, knowledge, experience and diversity on the Council and, in light of this evaluation, prepare a description of the role and capabilities required for a particular appointment.

In relation to Society employees, candidates are recruited through Lloyd's recruitment process which comprises competency-based interviews to enable Lloyd's to assess whether a candidate has the appropriate skills, knowledge and experience for the particular role in question.

#### Process for assessing fitness and propriety

The process for assessing the fitness and propriety of the persons who effectively run the Society or have other key functions is described in the Fit and Proper Policy which sets out how Lloyd's performs the necessary fitness and propriety checks prior to appointment and periodically thereafter for the various categories of roles to which the policy applies.

The Chairman maintains an ongoing dialogue with the non-executive members of Council and meets with each of them individually at least once a year to appraise their performance. In addition, each non-executive member of the Council meets individually with the General Counsel and Company Secretary mid-year.

The Senior Independent Deputy Chairman leads meetings of the other non-executive Council members without the Chairman present, at least annually, to appraise the Chairman's performance (and the Executive), and on any other occasions as necessary.

The Remuneration Committee reviews the performance of the Chairman, Chief Executive Officer and members of the Executive Committee. The Chief Financial Officer is responsible for reviewing the performance of the Lloyd's Chief Actuary through Lloyd's Performance Appraisal Process. The Audit Committee is responsible for annually reviewing the performance of the Head of Internal Audit and the results of this review are shared by the Chair of the Audit Committee with the CEO who jointly agree remuneration. Other employees who are either key function holders or performers are assessed through Lloyd's performance appraisal process. These reviews take into account the FCA/PRA requirements for fitness and propriety and conduct.

#### B.3 Risk management system including the own risk and solvency assessment

#### Risk management system

The Lloyd's Risk Management Policy describes its overall framework and approach for the management of risk, including the risk strategy, the internal governance arrangements, tools, processes and reporting procedures.

The Lloyd's Risk Management Framework ('the framework') ensures that the identification, assessment, monitoring and management of all material risks affecting the Society takes place on an ongoing basis. The framework includes a number of risk assessment techniques, which are tailored to specific risk areas.

#### Lloyd's Risk Management Framework

The management of all risks is, first and foremost, the responsibility of each employee and department at Lloyd's and decisions taken across the business have the potential to impact the risk profile of Lloyd's to a greater or lesser degree.

The Risk Management Function is responsible for establishing an effective risk framework and providing a secondary check and balance to ensure the range of risks taken by Lloyd's are well understood, effectively managed and in line with Lloyd's overall strategy and risk appetite. This objective is achieved through operation of the risk management framework.

The risk governance structure comprises the Executive Risk Committee and the Risk Committee. These provide clear independent challenge to the risk takers at Lloyd's. The risk committees oversee, challenge and where appropriate escalate issues using appropriate management information sourced from the risk management and internal control frameworks, such as the various risk and control assessments, details of the operating and regulatory environment and capital management reports.

A key objective of the Lloyd's risk governance structure is to provide assurance to the Council that risks facing the Society are identified and managed in accordance with approved policy and risk appetite. The Risk Appetite Framework articulates the level of risk believed to be acceptable and desirable for Lloyd's through a series of risk appetite statements and metrics. These are monitored on an ongoing basis by both the business areas responsible for each risk area and the risk committees.

#### Risk and control self-assessment (RCSA)

Lloyd's adopts a consistent approach in managing its risks through a risk and control self-assessment process, which is conducted on an ongoing basis, supported by a formal a bi-annual attestation process through which risk owners attest to the effective management of risks and controls. This process re-assesses the existing risks and identifies any new risks. It evaluates the performance of key controls and also seeks to monitor the action plans in place to help manage risks.

The framework also enables Lloyd's to undertake a forward-looking assessment of risk, building capital consideration into decision making processes. An Own Risk and Solvency Assessment (ORSA) is performed at least annually, bringing together key risk, capital and solvency management information on a more formal basis for the Council on a current and future basis.

#### **ORSA process**

The ORSA process is a key element of the risk management framework of Lloyd's. It incorporates a series of processes which ensure an appropriate level and quality of capital is maintained to support the risks taken within Lloyd's on a current and future

basis in light of the Lloyd's strategy set by the Council. The key focus of the ORSA is to continually assess Lloyd's own view of the risks faced and associated economic capital needs to meet its strategic goals.

The ORSA draws on existing ongoing oversight activities used to manage market and Society risk (including the risk and control assessment process, business plan and capital approval), the member capital setting processes and the determination of a central capital requirement.

#### ORSA frequency, review and approval

#### 'Business as usual' basis

The ORSA is an ongoing, continuous process which aligns to the Lloyd's business cycle. As such, the activities of the ORSA are performed through the course of the year. The risk profile is assessed on an annual basis. The risk profile is presented to the Council annually in the annual ORSA report.

#### Ad-hoc basis

Following the occurrence of a significant event, the activities within the ORSA may be revisited to ensure that they are still valid and to assess any potential impact on the level of economic capital and the own funds necessary to meet solvency requirements. Certain trigger events may require all activities within the ORSA process to be revisited, however, less material events may only trigger the review of some ORSA components.

#### Governance

The Council has overall responsibility for the review and approval of the ORSA process and report.

The Council will make key decisions and review and approve key outputs through the ORSA report but shall sub-delegate the day-to-day oversight and operation of the ORSA process to the relevant committee and function teams as detailed in the Lloyd's ORSA Policy.

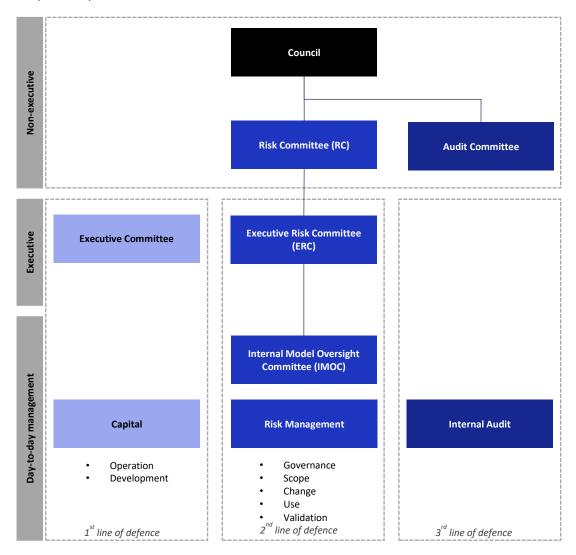
## Determination of own solvency needs and interaction of capital management activities with the risk management system

The outcome of the ORSA process is formally documented within the ORSA report. The ORSA report details how Lloyd's has completed its own solvency assessment given its risk profile. Furthermore, it is used to present the results of the various, inter-linked ORSA processes, illustrating the dependencies between strategy, risk, capital and solvency. It provides all the key information which has been assessed and the conclusions reached as part of the ORSA process to provide management with a suitable platform for appropriate oversight and for future strategy setting.

#### Governance over the Lloyd's Internal Model (LIM)

The LIM is owned by the Council, which relies on the LIM outputs for key decisionmaking activities. The Council delegates Executive responsibility to the CFO and CRO, with the Internal Model Oversight Committee established to carry out day-today duties. The Council delegates to the Risk Committee to provide oversight and challenge of the design, operation and validation of the LIM.

Lloyd's has embedded the structure set out below to ensure effective governance and oversight of the LIM and to ensure that the internal model continues to appropriately reflect the risk profile of the Society. The Governance framework highlighted below identifies those ultimately responsible for ensuring effective governance of the LIM and satisfying themselves that the operation, change and validation activities are performed in alignment with their respective policies.



#### Internal model validation

Validation is a key regulatory requirement and seeks to ensure that the LIM is both fit for purpose and that its outputs can be relied upon to make key strategic decisions across the Society. A successful validation is one of the key requirements for maintaining internal model approval.

The validation framework is set out in the Validation Policy. This includes the validation activities, owned by Risk Management, covering all the risk categories and associated processes of the LIM, both on a quantitative and qualitative basis.

Quantitative Validation	Qualitative Validation*
Attritional claims covering premiums risk and	
reserve risk for claims other than those	
considered under catastrophe risk	Internal Model Scope / Risk Coverage
Catastrophe risk (including natural catastrophe	
risk modelled in the Lloyd's Catastrophe Model	
("LCM"), and the integration of the LCM	
outputs into the calculation kernel ("CCK"))	Use
Reinsurance credit risk	Governance (including change)
Operational risk (Society and Syndicate)	Documentation
Additional Central Fund ("ACF")	Systems & IT
Market risk (including investment risk modelled	
in the Lloyd's Investment Risk Model ("LIRM"),	
and the integration of the LIRM outputs into	
the CCK)	Qualitative elements of Society operational risk
	Data Quality Standards (covered by a separate
Pension risk	policy)
Overall SCR, including dependencies between	
risks	

\* Validation of data quality standards (not listed above) is performed by Internal Audit on a period basis.

The validation process is performed over a three-year cycle. The purpose of the three-year cycle is to:

- Ensure validation activity is spread throughout the year;
- Allow a risk-based validation approach with majority of activity focused on the material risk areas;
- Ensure validation activity is directed at the areas which have been subject to change, e.g. methodology changes to ensure continuous model development or parameter updates to reflect changes to risk profile; and
- Allow targeted, in-depth validation activity into thematic areas.

The three-year validation cycle is implemented through four categories of tests:

- Core tests: these are validation tests which are run annually, regardless of any risk profile or model changes. The suite of core tests covers all areas of the model but is focused on the material areas;
- Extended tests: these are considered as extensions of the core tests, which are only necessary to run once within a validation cycle, assuming it has not been subject to either model or risk profile changes;
- 3. Additional tests: additional testing carried out in response to breaches of certain triggers or where further investigation is necessary; and
- 4. **Deep dives**: targeted, thematic validation reviews.

Validation at Lloyd's is a continuous and iterative process. A validation plan detailing the timings of the process is considered and agreed prior to each three-year validation cycle and reviewed and updated annually. Any validation actions agreed throughout the cycle are fed back into the design, operation and development of the internal model and reflected in the validation plan.

The activities on the validation plan are carried out through a combination of primary validation, performed by LIM component leads, and independent validation performed by the Validation team in Risk Management. The Validation team may be supported with external validation to enhance the level of independence and robustness of validation where necessary to inform on the reliability of the model and appropriateness of the model results.

Issues raised by the Validation team are assigned a materiality rating as defined in the Validation Policy and reported to the Internal Model Oversight Committee. Validation issues are also shared with the Executive Risk Committee and the Risk Committee (or Council where required) when reviewing the Solvency Capital Requirements. Progress on management's response to the issues raised are then reported quarterly to the Internal Model Oversight Committee. This process ensures there is clear and transparent recording of validation findings to inform the development of the internal model, thereby providing assurance on the effectiveness of the validation process.

#### B.4 Internal control system

#### Internal control system

An effective system of internal control is a critical component of a successful business: it provides the foundation for the safe and sound operation of a business, ensuring compliance with relevant laws and regulations and the safeguarding of assets.

Internal control at Lloyd's comprises a set of continually operating processes involving the Council, as Lloyd's AMSB, senior management and all levels of personnel who by acting together ensure that the specific goals and objectives of Lloyd's are met and that a strong control culture is prevalent across the business.

An effective internal control system is key to embedding responsibility for risk management across the business and supporting the attainment of overall business strategy. The internal control system is designed to reduce, rather than eliminate, and identify ways to mitigate the risk of failure to achieve business objectives and can only provide reasonable but not absolute assurance against material misstatement or loss.

The Council has responsibility for the Society's system of internal control and for reviewing its effectiveness. The Audit Committee monitors and reviews the effectiveness of the system of internal control, providing an annual internal control report and biannual reports on the key financial reporting controls to the Council. The Executive Committee is responsible for the implementation and maintenance of the internal control system and for instilling a strong internal control environment across the Society and market.

Lloyd's internal control system provides the foundation for the safe and sound operation of the business, ensuring compliance with relevant laws and regulations and the safeguarding of assets.

The Internal Control Policy describes the way in which the key components of the Lloyd's internal control system act together to ensure assurance processes are operationalised and risk oversight is applied. This policy describes key processes such that Lloyd's can consistently demonstrate:

- Effectiveness and efficiency of operations;
- Compliance with applicable laws, regulations and administrative provisions; and
- Availability and reliability of financial and non-financial information.

#### Implementation of the Financial Crime and Compliance function

Financial Crime and Compliance, part of the Risk & Regulatory function, focuses on:

Managing regulatory engagement with the PRA and FCA;

- Overseeing the Policy Governance Framework of the Society;
- Owning and operating the Consolidated Compliance Policy, which includes Conflicts of Interest, SMCR, Gifts and Hospitality, the Mandatory Training Framework and Whistleblowing;
- Owning the Financial Crime Policy;
- Financial Crime and Compliance Monitoring and reporting on the Society's regulatory and financial crime control compliance;
- Advising the Society on financial crime risk management;
- Monitoring the Market's compliance with the Lloyd's Principles of Doing Business, Principle 11;
- Acting as part of the Second Line of Defence, as part of the Risk Management function and interacting with Internal Audit as the Third Line of Defence.

Financial Crime and Compliance reports periodically, including on progress against Financial Crime and Compliance Plan, to the Executive Risk Committee and the Risk Committee.

#### B.5 Internal audit function

#### Implementation of the internal audit function

The Purpose, Authority and Responsibility of the Internal Audit function is defined within the Internal Audit Charter. Internal Audit's mission is to provide reliable independent and objective assurance to the Audit Committee and Executive Committee on the adequacy, effectiveness and sustainability of the system of internal control.

The primary scope of Internal Audit's activities is the examination and evaluation of the adequacy and effectiveness of the systems of risk management, internal control and governance processes for the Society of Lloyd's and its subsidiaries. In addition to this, Internal Audit's scope includes review of:

- compliance with policies, procedures, laws and regulations;
- reliability and integrity of information;
- means of safeguarding, verifying and accounting for assets;
- economic and efficient use of resources; and
- the accomplishment of strategic objectives.

To ensure adequate audit coverage of the Company's systems and controls an "audit universe" and risk based annual plan is prepared by Internal Audit. The audit universe and annual Plan are developed independently by Internal Audit with full reference to:

- the Executive Committee's and senior management views of the key risks facing the business;
- expectations and issues raised by the regulator;
- the Risk Management team, to ensure all relevant risks are addressed in a plan that forms part of a value adding assurance framework; and
- Internal Audit's discussions with the external auditor.

The Plan is submitted to the Executive Committee for discussion and input prior to being presented to the Audit Committee for review and approval.

#### Independence of the internal audit function

The Internal Audit Charter and Internal Audit Manual establish the framework in which the internal audit function operates. This includes affirming the independence of the internal audit function, stating that internal audit must be independent from management at all times to be effective in executing its work freely and objectively, including:

- The Head of Internal Audit has a direct reporting line, with direct and unlimited access, to the Chair of the Audit Committee and a secondary reporting line to the Chief Executive Officer;
- The Audit Committee is responsible for the approval of Internal Audit's annual Plan and the overall budget;
- Internal Audit is authorised to review all areas of Lloyd's and has full, free, and unrestricted access to all activities, records, property, and personnel necessary to complete their work including correspondence with regulators and Council and Committees meeting minutes;
- Internal Audit is authorised to allocate resources, set frequencies, select areas, determine audit scopes and apply audit tools and techniques, and to obtain the necessary assistance and specialised services within or outside Lloyd's to accomplish its objectives;
- Internal Audit reports with significant findings are reported in full to the Audit Committee;
- Internal Audit has the right to be informed by management, on a timely basis, of any significant control failures identified by management or the external auditor; and
- The Head of Internal Audit has the right to attend and observe all or part of Executive Committee meetings and any other key management decision making forums where they would have the appropriate standing, access and authority to challenge the Executive.

Internal Auditors have no direct responsibility or authority over any operating activities reviewed and should not relieve others of their responsibilities. Internal Audit are specifically prohibited from performing management activities, including:

- performing operational duties, including operation of policies and procedures;
- initiating or approving accounting transactions; and
- undertaking consulting engagements, specifically, those engagements where the primary aim includes process improvement, implementation of systems, or advising on operating practices (e.g. benchmarking).

In addition to Lloyd's in-house internal auditors, additional resource and specialist subject-matter experts are provided as required using a flexible co-source agreement. These additional resources report directly to the Head of Internal Audit. The Audit Committee keeps under review the relationship with co-source providers and the procedures to ensure appropriate independence of the internal audit function is maintained.

#### **B.6** Actuarial function

The Actuarial Function is a mandatory key function introduced by the Solvency II legislation. The Lloyd's Actuarial Function (LAF) carries out a number of activities during each year, both qualitative and quantitative. Lloyd's unique structure means that any requirements in respect of the Actuarial Function apply at both syndicate level and at the overall Society level. Syndicates are therefore required to have their

own Syndicate Actuarial Functions (SAFs) and part of the role of the LAF is to ensure these individual SAFs maintain the required standards.

The accountabilities and governance of the LAF are outlined in its Terms of Reference. The LAF and SAFs have a defined set of tasks which must be performed to adhere to the regulations as set out in the Solvency II Directive. These are to:

- Coordinate the calculation of technical provisions including:
  - Ensuring the use of appropriate methods and assumptions;
  - Ensuring sufficiency and quality of data; and
  - Comparing best estimates against experience;
- Express an opinion on the overall underwriting policy;
- Express an opinion on the adequacy of reinsurance arrangements;
- Contribute to the effective implementation of the risk management system with particular regard to risk modelling and ORSA; and
- Report at least annually to the Council on the results of this work; identify deficiencies where they exist; and make recommendations to address these.

The LAF meets the requirements by:

- Providing an appropriate framework (e.g. issuing guidance, standards and requirements) for Syndicates to operate:
- Requiring submissions of SAF reports and other documentation which demonstrates Syndicate compliance;
- Monitoring compliance against this framework;
- Performing top-down and bottom-up market oversight on reserving;
- Complying centrally through its own activities used to monitor the market; and
- Reporting to the Lloyd's Council at least annually on the work of the LAF, including compliance of the SAFs, and making recommendations to address any identified deficiencies.

The LAF is primarily resourced by the Market Reserving and Capital team. The work of the LAF is continuous over the course of the year. The requirements relating to technical provisions are met through the central calculation exercise undertaken by the LAF and oversight of SAF technical provisions. Measures of SAF oversight include detailed review of a sample of SAF reports as well as other quantitative and qualitative information submitted to Lloyd's. Together these exercises are designed to highlight any potential issues with the level of technical provisions for the market and take appropriate action to remedy these.

The requirement to provide opinions on reinsurance and underwriting is satisfied at individual Syndicate and Society level. At the Society level this involves collaboration with other areas of the Society with primary oversight responsibility for underwriting and reinsurance.

Contribution to the risk management process and the ORSA includes the LAF work with respect to the Lloyd's Internal Model. Evidence of similar contribution is also required from SAFs.

The LAF provides a written report to the Council, on an annual basis, documenting all the tasks that it has undertaken, results, identifying any deficiencies and giving recommendations as to how such deficiencies should be remedied. The LAF also receives reports from all SAFs on an annual basis, covering the areas outlined above.

## B.7 Outsourcing

## Description of outsourcing policy

Lloyd's has established an Outsourcing Policy to provide a clear overview of the processes, controls and reporting procedures in place to ensure that the outsourcing of its functions or activities does not adversely affect Lloyd's or the Market's risk profile, or Lloyd's ability to meet regulatory responsibilities.

Lloyd's performs many activities necessary for the operation of its business, including providing services required in support of the efficient running of the Lloyd's Market. In some instances, it may be considered more cost effective to utilise the services of an external supplier with the necessary expertise. In these circumstances, Lloyd's may enter into an outsourcing arrangement with a third-party supplier.

Outsourcing arrangements result in a shift from direct to indirect operational control of the activity and have the potential to increase the exposure of Lloyd's to operational risk. The Council, as Lloyd's AMSB, remains fully responsible for any activity or function outsourced and must ensure that Lloyd's does not outsource any activity which will unduly raise its exposure to operational risk.

Strong governance and management oversight over the outsourcing process, combined with assurance provided by regular management information, are essential controls for managing outsourcing risk and understanding the impact of outsourcing on Lloyd's business.

Outsourcing of critical or important operational functions or activities The Society of Lloyd's is currently utilising several suppliers to undertake critical activities on its behalf. Details of the activities they provide and the jurisdictions they operate in are shown in the table below:

Services Provided	Jurisdiction
Broadridge Financial Solutions Limited – asset management platform	United Kingdom
Verisk Analytics Limited – Market Data Capture (MDC) platform	United Kingdom
Microsoft Ireland Operations Limited – software products and licences and Azure cloud platform	United Kingdom

## B.8 Any other information

Assessment of adequacy of the system of governance

In accordance with the UK Corporate Governance Code, an external and independent evaluation of the performance of the Council, Audit, Remuneration and Nominations & Governance Committees is undertaken every three years. The last external evaluation was undertaken by YSC Consulting ('YSC') and took place in 2021. YSC's report was presented to the Council in May 2021 and a summary was presented to members at the May 2021 AGM. An Internal evaluation was undertaken in December 2021 with the results presented to the Council and relevant Committees in Q1 2022.

<u>Any other material information</u> There is no other material information to report.

## C Risk profile

#### Overview

At Lloyd's, the risk profile originates from both syndicates and at central level.

Syndicates are the source of the majority of risks. They source all the insurance business; manage the bulk of the asset portfolios; hold the majority of the counterparty exposures; and conduct most of the day-to-day operational activity. The syndicate risks include: insurance risk (underwriting, reserving and catastrophe risk); market risk on central assets; market risk on syndicate assets (including credit risk on Premiums Trust Funds (PTF)); reinsurance and other credit risk; and syndicate operational risk.

At the central level, additional risks arise from central operational risk, market risk on central assets and pension fund risk.

## Solvency Capital Requirement (Solvency II basis)

The Solvency Capital Requirement (SCR) represents the amount of capital required to withstand up to a 1 in 200-year loss event over a 12-month time horizon. Given Lloyd's unique structure there are two SCRs which are monitored under the Solvency II regime:

- The Lloyd's market wide SCR (MWSCR) is calculated to cover all the risks of 'the association of underwriters known as Lloyd's', i.e. those arising on syndicate activity, members' capital provided at Lloyd's and the Society taken together, at a 99.5% confidence level over a one-year time horizon as provided for in Solvency II legislation. All the capital of the component parts of the market taken together is available to meet the MWSCR.
- The Lloyd's central SCR (CSCR) is calculated in respect of only the risks facing the Corporation and the Central Fund at the same confidence level and time horizon used to calculate the MWSCR. The material risk is that members do not have sufficient funds to meet their underwriting losses even having complied with Lloyd's rigorous capital setting rules.

Individual syndicates are also required to calculate a SCR, at a 99.5% confidence level over a one-year horizon, for each underwriting year; this drives the determination of member level SCRs. Each member's SCR is derived as the sum of the member's share of the syndicate's one-year SCR. Where a member participates on more than one syndicate, a credit for diversification is provided to reflect the spread of risk. The MWSCR and CSCR are derived from the Lloyd's Internal Model which has been approved by the PRA. Individual syndicates also derive SCRs from their own internal models which are subject to approval by the Lloyd's Capital and Planning Group. The appropriateness of each syndicate's internal model, including changes thereto and the reasonableness of the key assumptions are assessed as part of the Society's oversight of the Lloyd's market.

#### Lloyd's Internal Model

The Lloyd's Internal Model (LIM) is a purpose-built model designed to calculate the MWSCR and CSCR as required under Solvency II. It covers all risk types and all material risks for the aggregation of syndicates as well as for the Society, allowing for the unique capital structure of Lloyd's. The LIM consists of three main components: the Lloyd's Investment Risk Model (LIRM) which simulates economic variables and total assets returns; the Lloyd's Catastrophe Model (LCM) which models catastrophe

risk using syndicates' views of risk; and the Capital Calculation Kernel (CCK) which is the main element of the LIM where all other risks are simulated, and all risks are combined. A Major Model Change Application was approved in December 2021.

Syndicates calculate their own SCR, however, the market wide and central capital requirements are derived from Lloyd's parameterisation at a whole market level to build a view of total market capital requirements from the ground up using market level assumptions. The LIM uses a methodology whereby losses from insurance and other risks are simulated by class of business, allocated to syndicates and through to members to assess the level of capital required by the market and centrally to meet up to 1 in 200-year losses over the one-year time horizon.

#### Lloyd's MWSCR

The MWSCR is broken down into the various risk components at 31 December 2021 as shown below.

	2021	2020
	£m	£m
Reserving risk	7,550	7,790
All other (attritional) underwriting risk	7,822	8,248
Catastrophe risk	802	1,357
Market risk	2,304	2,389
Reinsurance credit risk	728	836
Operational risk	431	893
Pension risk	35	40
MWSCR before adjustments	19,672	21,553
Foreign exchange adjustment	228	(1,212)
MWSCR	19,900	20,341

Lloyd's central SCR

The central SCR at 31 December 2021 is £1,250m (2020: £2,085m).

## C.1 Insurance Risk (including underwriting risk)

The dominant category of risk faced by Lloyd's syndicates is insurance risk. This is the risk arising from the inherent uncertainties as to the occurrence, amount and timing of insurance liabilities. In practice, insurance risk can be subdivided into: (i) underwriting risk:

- (ii) reserving risk; and
- (iii) catastrophe risk.

#### Underwriting risk

This includes the risk that a policy will be written for too low a premium, provide inappropriate cover, or that the frequency or severity of insured events will be higher than expected.

Underwriting strategy is agreed by the Board of each managing agent and set out in the syndicate business plan that is submitted to the Society for approval each year. Approval of business plans – and setting the capital requirements needed to support these plans – is the key control the Society uses to manage underwriting risk.

The Society reviews each syndicate business plan to ensure it meets Lloyd's standards and is consistent with the capabilities of the managing agent. Once a plan is agreed, the Society uses performance management data to identify whether each

syndicate's business performance is progressing in line with the business plan or that variations are understood and accepted.

The managing agents' underwriting controls should ensure that underwriting is aligned with their strategy, agreed business plan and underwriting policy. Managing agents are expected to have controls in place to ensure that regulatory requirements and the scope of Lloyd's market licences are clearly understood and that risks are written within those requirements.

Managing agents need to have clear processes for pricing business and an audit trail to show how pricing will deliver the projected results within the approved business plan and how pricing will be managed over the relevant underwriting cycle.

The Society does not seek to eradicate the inherent risks of insurance risk from the market but to ensure that they are managed within a commercial and prudent underwriting environment. The key processes that provide assurance to the Council include:

- Reviewing and agreeing syndicate business plans and capital;
- Quarterly performance monitoring;
- Adherence to the Lloyd's Principles for Doing Business (published in December 2020);
- New entrant approval;
- Risk governance; and
- Risk appetite monitoring.

#### Reserving risk

Reserving risk arises where the reserves established in the balance sheet are not adequate to meet eventual claims arising. The level of uncertainty varies significantly from class to class but can arise from inadequate reserves for known or Incurred but Not Reported claims (IBNR claims). These shortfalls can arise from inadequate reserving processes or from the naturally uncertain progress of insurance events. Lloyd's current level of aggregate market reserves remains robust and the continued level of overall reserve releases are supported by underlying claims experience being more favourable than expected.

Syndicates set reserves and obtain an annual Statement of Actuarial Opinion ("SAO"). The SAO is produced under the guidance and valuation of liability rules set by Lloyd's. Additionally, the requirements for individuals to provide opinion is set by the UK Actuarial Profession; the Lloyd's Actuary has close access to the relevant committees in the UK professional body and is able to ensure that the guidance is kept in line with Lloyd's objectives.

Additional reserve monitoring exercises undertaken by Lloyd's include:

- Market-level reserving exercise to highlight potential areas of concern on reserving by class of business and year of account;
- Allocation of the IBNR from this reserving exercise to syndicate by class of business and year of account to highlight syndicates with potential areas of concern on reserving;
- Relative reserve analysis, comparing reserve strength between syndicates;
- IBNR burn analysis;
- Forward looking analysis, monitoring syndicates which exhibited material growth and/or lower than expected loss ratio assumptions
- Large loss monitoring; and

Meeting Lloyd's Reserving Principles for Doing Business (replacing minimum standards).

These reserve monitoring exercises feed into Lloyd's syndicate reserving oversight framework as a series of risk metrics to assist in categorising syndicates to determine reserving oversight activities for the forthcoming calendar year.

## C.2 Market risk

Market risk is the risk that the values of financial instruments will fluctuate because of movements in foreign currency, interest rates or asset values. Syndicate assets are held in premium trust funds (PTFs) and are subject to the asset rules contained in the PRA's handbook. Market risk can arise in respect of the investments held by syndicates and centrally in respect of capital provided by members and assets held by the Society including the Central Fund.

Market risk represents the risk that movements in financial markets will affect the financial position of the Society. Market risks arising from the disposition of the Society's investments are monitored against defined parameters using Value at Risk (VAR) methodology. The position is reviewed regularly by the Investment Committee. Investments are actively monitored on a fair value basis and all investments are designated as fair value through profit or loss.

Managing agents manage asset risk through their investment strategy. There is greater oversight of market risk in light of the volatile economic climate, which includes the monitoring of Lloyd's Principles for Doing BusinessAssets are monitored across the full Lloyd's Chain of Security to ensure the asset disposition of the market and Society remains appropriate, closely monitoring global economic and market trends.

The potential financial impact of changes in market value is additionally monitored through the capital setting process, and asset mix must be reported to Lloyd's on a quarterly basis, including credit rating analysis of fixed income portfolios.

Market risk comprises three types of risk:

- (a) currency risk;
- (b) interest rate risk; and
- (c) equity price risk.

#### Currency risk

Managing agents must identify the main currencies in which each syndicate transacts its business. For the market overall, the US dollar is the largest currency exposure. Assets are then held in each of those currencies to match the relevant liabilities. Managing agents must ensure that assets match liabilities and take corrective action where a mismatch arises. Lloyd's also reviews the matching of assets to liabilities at the syndicate level as well as at the market level.

#### Interest rate risk

Interest rate risk is the risk that the value and future cash flows of a financial instrument will fluctuate because of changes in interest rates. In general, Lloyd's operates a generally conservative investment strategy with material cash and short dated bonds portfolios, which gives rise to low levels of interest rate risk exposure.

#### Equity price risk

Equity price risk is the risk that the fair value or future cash flows of a financial

instrument will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk). Those changes are caused by factors specific to the individual financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market. Financial assets and liabilities may be exposed to equity price risk. Such risks are managed by setting and monitoring objectives and constraints on investments, diversification plans and limits on investments in each sector and market. In aggregate there is no significant concentration of equity price risk.

## C.3 Credit risk

Credit risk represents the risk of financial loss if a counterparty, or the issuer of a security, fails to meet its contractual obligations. The assets of syndicates, members' capital and Society assets are exposed to credit risk.

The market's principal credit risk is that the reinsurance purchased to mitigate gross losses does not respond as expected. This can occur because reinsurers are unable to settle their liabilities. Managing agents are expected to have a clear and comprehensive plan for the reinsurance of each syndicate. This takes into account risk appetite for retained insurance risk and the potential for the accumulation of risk. Managing agents are expected to regularly monitor and assess the security of, and exposure to, each reinsurer, intermediary and any collateral arrangements that support their reinsurance protections. Reinsurance credit risk is subject to quarterly review by Lloyd's.

Society assetsare also exposed to credit risk. With regard to credit investments, Lloyd's performs further credit analysis and does not solely rely on external credit ratings as an indicator of investment eligibility. This includes a top-down approach (macroeconomic environment and cyclical outlook) and a bottom-up approach (business fundamentals, issuer analysis and security analysis).

## C.4 Liquidity risk

Liquidity risk arises where there are insufficient funds to meet liabilities, particularly claims. This may affect assets held by syndicates, provided as members' capital and held by the Society.

Managing agents are expected to manage the cash needs of their syndicates on an ongoing basis and to avoid becoming forced sellers of assets. They are required to have an asset liability matching (ALM) policy which describes how they manage any duration risk arising from a mismatch between syndicate investments and policyholder liabilities. Generally, syndicates have a high concentration of liquid assets, namely cash and government securities.

The value and term of short-term assets are carefully monitored against those of the Society's liabilities. The Society maintains sufficient liquid assets to meet liabilities as they fall due. The liquidity of the Central Fund is monitored separately.

Lloyd's centrally monitors syndicate liquidity both in terms of asset mix and future funding needs and conducts stress tests to monitor the impact on liquidity of significant claims events.

## C.5 Operational risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. Operational risk is modelled using a scenario analysis approach, generating operational loss scenarios in conjunction with business teams. This may arise at syndicate level and centrally.

Managing agents manage these risks through internal compliance monitoring and the use of detailed procedure manuals. Lloyd's sets Principles for Doing Business (published December 2021 and replacing minimum standards) to be applied by agents and monitors to ensure these are met.

Syndicate SCRs calculated with internal models are also required to include a capital requirement in respect of operational risks. The methodology used will be different for each syndicate (as operations are different) but all syndicates are obliged to include their operational risk exposures within their internal model.

In addition, elements of operational risk which arise as a result of syndicate operations but are not felt to be adequately captured in their internal models are modelled centrally. This is known as Additional Central Fund (ACF) risk.

## C.6 Other material risks

#### Regulatory risk

Regulatory risk is the risk of loss owing to a breach of regulatory requirements or failure to respond to regulatory change. Managing agents monitor regulatory development to ensure ongoing compliance and any impact on claims reserves. Additionally, given current developments in the global regulatory landscape, the Society closely monitors changes which may adversely impact the global licence network. Lloyd's is actively working with the market to assist and adapt to the changes in the UK regulatory architecture, in particular the increased focus on conduct risk by the FCA; managing agents are now expected to comply with the Lloyd's Principles for Doing Business. Similarly, Lloyd's monitors global political trends and is taking action at both a Society and market level in response to a growing geopolitical risk facing companies operating around the world.

#### Group risk

Group risk is the risk of loss resulting from risk events arising within a related entity. While Lloyd's is not a group, the Society monitors potential risks which could impact Lloyd's, for example arising from the activities of a parent company of a syndicate or managing agent. Whilst, by its nature, group risk is difficult to control, the Society mitigates the potential impact of group risk through the implementation of controls, including Lloyd's Principles for Doing Business, mitigating any material impairment to Lloyd's brand, reputation or strategic priorities.

#### Concentration risk

Lloyd's closely monitors concentrations of risk across the market and tests risk exposure against clearly defined risk appetites as established by the Council. Specialist supervisory teams across Lloyd's monitor concentrations across the following areas: region-perils, class of business, geographical location, and method of distribution in insurance and investment counterparties, amongst others. Whilst syndicates define the type of business that they write, at the market level Lloyd's seeks to avoid inappropriate concentration of premium sources, monitoring concentration of business in poorly performing classes, and material sources of premium by method of placement as well as coverholder concentration. Managing agents controlling more than 10% of overall market gross written premium are also subject to Council review. Any reported metrics outside of appetite are reported to and discussed by the Risk Committee and the Council. Specific and targeted actions can then be agreed, which will be discussed with specific managing agents or the market as a whole, as appropriate. These actions can vary considerably depending on the nature of the risk or the class of business impacted, with different levels of the requirements placed on syndicates, which forms part of Lloyd's oversight role of the market.

#### Climate change risks

Climate change is unique, not only in the challenge it poses to the world, but also in its potential to create significant risks (and opportunities) across the entire risk profile of financial service sector companies (risks that may crystallise over short, medium and long time horizons).

Climate change risks are now embedded into the Lloyd's risk framework. While climate risk isn't considered to be a risk category in itself, it may increase the frequency and severity of losses within the existing risk categories described in C.1 – 5. Participation in the Bank of England's Climate Biennial Exploratory Scenario (CBES) during 2021, as well as ongoing new research from Lloyd's Futureset, has significantly improved Lloyd's understanding of how climate change risks may impact the risk profile and this continues to be an area of focus.

#### Prudent person principle

In accordance with Article 132 of Directive 2009/138/EC, all assets at Lloyd's are invested in accordance with the prudent person principle.

#### Syndicate level assets

Managing agents, as trustees, are responsible for the investment of their own syndicate PTFs. The members of the syndicate are the primary bearers of financial risk. Managing agents identify planned investment risk within the SCR and members are required to provide sufficient capital to support this risk. PTF investments must be managed in accordance with PRA requirements under the Prudent Person Principle. PTF investments must also comply with the Membership & Underwriting Requirements (M&URs) issued by Lloyd's. Syndicates must submit information on investment returns and dispositions to Lloyd's quarterly.

Lloyd's oversight of syndicates' investment activities is carried out in line with the wider holistic oversight framework. Syndicates are assessed by Lloyd's quarterly using a mixture of qualitative and quantitative measures. Where Lloyd's deem a syndicate to be underperforming against expectations, Lloyd's may implement a series of interventions such as requiring investment dispositions to be amended, or more typically that additional capital be provided by members, as appropriate.

Lloyd's also considers periodically whether any additional rules should be adopted for prudential reasons beyond the PRA requirements of the Prudent Person Principle.

If Lloyd's identifies that in aggregate, syndicates are exposed to inappropriate levels of investment risk, it may constrain the investment dispositions of all syndicates and amend the M&URs.

#### Member level capital (FAL)

Each member of Lloyd's is responsible for the investment of their own FAL and is the primary bearer of the resulting financial risk. Lloyd's acts as trustee and custodian of

FAL assets and reviews all transactions in advance of approving them for settlement. All FAL investments must comply with the PRA requirements under the Prudent Person Principle; additionally, they must also comply with the Lloyd's M&URs.

The M&URs include a Standard Strategic Asset Allocation (SSAA), which members must comply with at an aggregate capital level. The SSAA imposes limits on risk assets and issuer exposure to better manage FAL investment risk and to encourage diversification. Asset dispositions are analysed quarterly by Lloyd's and a capital charge test is applied annually should a member's aggregate capital position be outside of this SSAA.

Where concerns are identified, Lloyd's may engage with members to understand risk strategies and may require that investment dispositions be amended. Where members do not comply with such requirements Lloyd's, in its capacity as trustee, may intervene to amend investment dispositions. Lloyd's may also require a member to maintain additional assets within their FAL if that member's FAL investments exceed defined risk limits.

If Lloyd's identifies risks which are unacceptable when considering all FAL assets, or all FAL and PTF assets together, it may, in extremis, adjust permitted investments for all participants by amending the M&URs.

Lloyd's also considers periodically whether any additional rules should be adopted for prudential reasons beyond the PRA requirements of the Prudent Person Principle.

#### Central resources

Lloyd's complies with the Prudent Person Principle in respect of central resources by ensuring that:

- Lloyd's primarily does not invest in investments that are not admitted to trading on a regulated financial market or in complex products which are difficult to value. Neither does it invest in investments which are not traded or traded on a non- regular basis. Lloyd's has robust processes for selecting risk assets and/or illiquid assets as well as robust and thorough liquidity assessments. Selection of illiquid assets must comply with the illiquidity risk appetite process.
- Derivatives are only permitted to facilitate risk management and not speculation. Lloyd's use of derivatives is currently limited to forward foreign exchange contracts, equity futures and interest rate swaps. Effective risk transfer is obtained by transacting both these derivatives under Master International Swaps and Derivatives Association (ISDA) agreements with the derivative counterparties. Considerations of how the quality, security, liquidity and profitability of the Central Fund portfolio is improved without significant impairment of any of these features is made by the Lloyd's Investment Committee. Approved procedures have been implemented in line with this risk policy to monitor the performance of these derivatives and against defined risk limits.
- Before investing in securitised assets, the Society ensures that Lloyd's interests and the interests of the originator or sponsor concerning securitised assets are well understood and aligned. All securitised assets must meet Solvency II eligibility criteria.

#### **Stress testing**

Lloyd's seeks to continuously identify and examine Stress and Scenario Tests (SSTs) which may have an adverse impact on the business model to ensure

potential risks are clearly understood, monitored effectively and adequate controls are in place.

The outcomes/conclusions of the SSTs form an integral part of the overall risk management system and act as a prompt to senior management to take action across a range of areas such as: implementing changes to the LIM, re-evaluating risk appetites, reviewing the application of Franchise Guidelines, business plan decisions for syndicates and capital management decisions (e.g. setting Economic Capital). The results of these, as reflected in the ORSA process, inform Lloyd's management in terms of making decisions with regard to member level and central capital strategy over the medium term.

In 2020, Lloyd's also introduced Business Plan Stress tests into the suite of Stress and Scenario tests. In Q1 each year the assumptions underlying the aggregate business plan are subjected to a number of stresses. The results of this are considered as part of assessment of capital adequacy and also inform areas of focus for the following year CPG review.

## C.7 Any other information

As reported on R0790 of template S.23.01 as shown in Appendix 1, the total of Expected Profit In Future Premiums (EPIFP) as at 31 December 2021 amounted to  $\pm 5,105m$  (2020:  $\pm 4,224m$ ).

Additional information on risk management at Lloyd's may be found at note 4 of the market results (pages 39 to 51) and pages 162 to 165 with respect to the Society within the Lloyd's Annual Report 2021.

## D Valuation for Solvency Purposes

Sections/items indicated with an asterisk (\*) are not subject to reasonable assurance.

A comparison of Lloyd's UK GAAP and Solvency II balance sheets is summarised in the following table:

31 December 2021	UK GAAP	Change	Solvency II
Assets	£m	£m	£m
Deferred tax assets	57	44	101
Intangible assets	58	(58)	-
Investments	72,977	932	73,909
Loans and mortgages	180	-	180
Property, plant & equipment held for own use	10	125	135
Reinsurers' share of technical provisions	28,284	(11,482)	16,802
Deferred acquisition costs	4,528	(4,528)	-
Deposits to cedants	720	287	1,007
Insurance and reinsurance receivables	19,345	(10,855)	8,490
Receivables (trade, not insurance)	970	152	1,122
Cash and cash equivalents	10,957	(7,727)	3,230
Any other assets	69	311	380
Total assets	138,155	(32,799)	105,356
Liabilities			
Technical provisions	86,874	(86,874)	-
- Best estimate	-	61,944	61,944
- Risk margin*	-	4,104	4,104
Provisions other than technical provisions	53	61	114
Pension benefit obligations	106	-	106
Deposits from reinsurers	1,734	(30)	1,704
Derivatives	41	23	64
Debts owed to credit institutions	575	15	590
Insurance and reinsurance payables	8,986	(5,047)	3,939
Payables (trade, not insurance)	2,538	(269)	2,269
Subordinated liabilities	796	75	871
Any other liabilities	(101)	1,281	1,180
Total liabilities	101,602	(24,717)	76,885
Net excess of assets over liabilities	36,553	(8,082)	28,471

31 December 2020	UK GAAP	Change	Solvency II
Assets	£m	£m	£m
Deferred tax assets	56	46	102
Intangible assets	54	(54)	-
Investments	69,361	1,313	70,674
Loans and mortgages	117	(37)	80
Property, plant & equipment held for own use	13	142	155
Reinsurers' share of technical provisions	25,073	(9,233)	15,840
Deferred acquisition costs	4,148	(4,148)	-
Deposits to cedants	71	104	175
Insurance and reinsurance receivables	17,526	(14,778)	2,748
Receivables (trade, not insurance)	1,162	65	1,227
Cash and cash equivalents	10,473	(7,734)	2,739
Any other assets	250	3,630	3,880
Total assets	128,304	(30,684)	97,620
Liabilities			
Technical provisions	81,107	(81,107)	-
- Best estimate	-	61,534	61,534
- Risk margin*	-	3,903	3,903
Provisions other than technical provisions	69	102	171
Pension benefit obligations	187	-	187
Deposits from reinsurers	727	(47)	680
Derivatives	53	20	73
Debts owed to credit institutions	543	37	580
Insurance and reinsurance payables	8,257	(5,908)	2,349
Payables (trade, not insurance)	2,087	(202)	1,885
Subordinated liabilities	-	919	919
Any other liabilities	1,333	316	1,649
Total liabilities	94,363	(20,433)	73,930
Net excess of assets over liabilities	33,941	(10,251)	23,690

A qualitative description of the reasons for differences between UK GAAP and Solvency II is set out at section D.1 (assets), D.2 (technical provisions) and D.3 (liabilities other than technical provisions).

## D.1 Assets

Valuation of assets including differences between Solvency II and UK GAAP

## **Overview**

Lloyd's requires each syndicate to prepare a Solvency II balance sheet in accordance with Solvency II valuation rules.

Members' FAL are valued at fair value and thus comply with Solvency II valuation principles.

Solvency II requires that all liabilities should be measured at fair value. However, book value as per UK GAAP is used as a proxy for the fair value for Solvency II balance sheet purposes where the difference in valuation is not material.

#### **Recognition**

Assets are recognised only when economic benefits are expected to be received in future.

Under Solvency II, future cash flows relating to insurance and reinsurance contracts are included in the measurement of technical provisions. However, overdue cash flows are treated as insurance receivables in the balance sheet. This is the same principle that Lloyd's has applied in the recognition of insurance receivables. Lloyd's has applied similar principles as those applied for insurance receivables in assessing recognition of reinsurance receivables. Amounts recoverable from reinsurers relating to claims paid have been included in the balance sheet as reinsurance receivables.

## **Derecognition**

Assets are derecognised once they have been transferred to a third party i.e. substantially all risks and rewards are transferred.

#### Deferred tax assets

Deferred tax assets relate solely to the Society of Lloyd's. This is because syndicates account for their results gross of tax. Tax is assessed at member level and is outside of the scope of the Lloyd's financial statements. Deferred tax assets are recognised for all deductible temporary differences and unutilised tax losses to the extent that it is probable that taxable profits will be available against which the deductible temporary differences or tax losses can be utilised. Deferred tax is measured on an undiscounted basis at the rates that are expected to apply in the periods in which timing differences reverse, based on tax rates and laws enacted or substantially enacted at the reporting date.

#### **Investments**

Most of Lloyd's investments i.e. premium trust funds, FAL and Central Fund assets are fixed income investments. These are mainly government bonds and corporate bonds. In addition, significant amounts of equities are held, particularly within members' FAL and the Central Fund. Solvency II requires investments to be valued at their fair value.

Information of the valuation of investments for the purposes of the financial statements may be found on page 55 of the Lloyd's Annual Report 2021. There are no material differences in the valuation of investments for Solvency II and UK GAAP. However, the allocation of accrued interest has been included within the relevant investment assets rather than in 'Any other assets'.

## Government bonds

These are valued at market value i.e. based on quoted prices. These bonds are regularly traded and hence their prices are easily obtained. These prices are obtained from the custodians. However, where these are not considered current, a tradable quote from a broker is sought.

## Corporate bonds

Most of the corporate bonds are of very high quality i.e. BBB rating and above. These bonds are regularly traded and hence their prices are easily obtained. Similar to the government bonds, these are valued at market value, based on the quoted prices

provided by the custodians. Similar to government bonds, where prices from custodians are deemed not to be fresh, a tradable quote from a broker is sought.

#### Equity and investment funds

Equity investments held by Lloyd's are mainly listed and hence their prices are readily available. These are valued at market value based on the quoted prices provided by custodians.

#### Loans and mortgages

These consist of the following:

- Loans and mortgages to individuals relating to recoverable Central Fund loans made to hardship members; and
- Other loans and mortgages relating to syndicate investment assets classified as loans and mortgages other than 'Loans and mortgages to individuals' and 'Loans on policies'.

These are initially recognised in the financial statements at amortised cost. There are no material differences in the valuation of the 'loans and mortgages' held by Lloyd's for Solvency II compared with UK GAAP.

#### Property, Plant and equipment held for own use

Right of use assets in respect of the Society's operating leases are recognised on the Society's Solvency II balance sheet. Right of use assets are not recognised on the PFFS UK GAAP balance sheet.

#### Deposits to cedants

These are deposits relating to reinsurance accepted business. The UK GAAP value is reported in the Solvency II balance sheet as the impact of discounting is not material, because the balances are either due within 1 year or the amounts due in greater than 1 year are not material.

#### Insurance and reinsurance receivables

These are valued at fair value by discounting expected cash flows using a risk-free rate. However, book value as per UK GAAP is used as a proxy for the fair value for Solvency II balance sheet purposes where the impact of discounting is not material because the balances are due within one year or amounts due in more than one year are not material.

While determining the valuation amount, Lloyd's has considered the recoverability of these balances; hence the amount recognised in the balance sheet is net of expected losses as a result of default.

Under Solvency II, future cash flows relating to insurance and reinsurance contracts are included in the measurement of technical provisions, excluding overdue cash flows which remain as insurance receivables in the balance sheet and there are no material differences in the valuation of the overdue amounts for Solvency II and UK GAAP.

#### Receivables (trade, not insurance)

Receivables are recognised at their book value using UK GAAP where these assets crystallise within one year; in this case no discounting is applied as this would be immaterial.

## Cash and cash equivalents

'Cash and cash equivalents' comprise of cash in hand and demand deposits, together with short term, highly liquid investments that are readily convertible to a known amount of cash, and that are subject to an insignificant risk of change in value. These are short term investments with a maturity period of three months or less from the date of acquisition.

Cash in hand and demand deposits are valued at the amount held at the end of the year plus accrued interest at the end of the year, where applicable.

The value of letters of credit, guarantees and life policies provided within FAL, which represent ancillary own funds (see section E.1 below), and which are included in 'cash and cash equivalents' in the table in section D are excluded from the Solvency II balance sheet but are recognised at their Solvency II valuation as ancillary own funds in the own funds template.

## Any other assets

These include items such as prepayments and other assets. Book value as per UK GAAP is used as a proxy for the fair value for Solvency II balance sheet purposes where the impact of discounting is not material because the balances are due within one year or amounts due in more than one year are not material. Consequently, the UK GAAP value is reported in the Solvency II balance sheet.

## D.2 Technical provisions

Solvency II technical provisions by material line of business

The tables below summarise the Solvency II technical provisions for the market by high-level class of business:

Class	Gross best estimate	Net best estimate	Risk margin*	Total net technical provisions including risk margin
	£bn	£bn	£bn	£bn
Accident & Health	2.48	1.81	(0.16)	1.65
Aviation	1.70	1.10	0.08	1.18
Casualty Financial & Professional Lines	14.42	10.08	0.71	10.79
Casualty Other	12.68	10.68	0.64	11.32
Casualty Treaty	4.30	3.16	0.21	3.37
Energy	5.64	4.70	0.37	5.07
Marine	5.36	4.41	0.58	4.99
Property (Direct & Facultative)	7.07	3.62	0.38	4.00
Property Treaty	5.99	4.98	1.21	6.19
Specialty Other	2.33	0.60	0.09	0.69
Total	61.97	45.14	4.11	49.25

## 31 December 2021

### 31 December 2020

Class	Gross best estimate	Net best estimate	Risk margin*	Total net technical provisions including risk margin
	£bn	£bn	£bn	£bn
Accident & Health	3.69	2.74	0.20	2.94
Aviation	1.85	0.91	0.08	0.99
Casualty Financial & Professional Lines	13.54	9.14	0.47	9.61
Casualty Other	13.54	10.05	0.62	10.67
Casualty Treaty	4.31	3.66	0.16	3.82
Energy	3.69	2.28	0.23	2.51
Marine	5.54	6.85	0.43	7.28
Property (Direct & Facultative)	6.77	5.48	0.31	5.79
Property Treaty	5.54	2.74	1.33	4.07
Specialty Other	3.06	1.84	0.07	1.91
Total	61.53	45.69	3.90	49.59

A summary of technical provisions by Solvency II line of business is provided in Appendix 1 on templates S.12.01 and S.17.01.

## Calculation of technical provisions

The technical provisions are calculated in line with the prescribed Solvency II requirements as per Articles 76 to 86 of Directive 2009/138/EC. In particular, the value of technical provisions corresponds to the current amount insurance and reinsurance undertakings would have to pay if they were to transfer their insurance and reinsurance obligations immediately to another insurance or reinsurance undertaking. The calculation of technical provisions makes use of and is consistent with information provided by the financial markets and generally available data on underwriting risks (market consistency).

The technical provisions are calculated by syndicates in accordance with Lloyd's Technical Provisions Guidance November 2019. The calculations are undertaken by individual syndicates with the calculation basis and assumptions made at this level. Across the market the following bases, methods and assumptions are most relevant:

- Provisions for future claims are the most material element of the technical provisions;
- Provisions for future claims are based on standard actuarial techniques for estimation of non-life insurance liabilities;
- Assumptions relating to run-off patterns and loss ratios are material to the calculation of future claims provisions;
- In discounting technical provisions, the risk free yield curves published by the PRA are used. The rates used should be the basic risk-free rate curves with no volatility adjustment. For currencies for which the PRA does not publish technical information/discount rates, it is a firm's responsibility to propose discount rates that complies with Solvency II requirements and justify its approach to its supervisor;

- With regard to contract boundaries all contracts to which the syndicate is legally obliged are included and each existing contract, including reinsurance, is considered in its own right; and
- Reinsurance recoveries are calculated based on consideration of the inwards exposures and the reinsurance in place, including the impact of any claims experience to date.

The calculations are undertaken by individual syndicates with the calculation basis and assumptions made at this level. This includes the consideration of homogenous risk groupings used for the valuation, which will vary between syndicates based on the consideration of the specific syndicate risk profile.

## Level of uncertainty associated with the value of technical provisions\*

Provisions for future claims are the most material and uncertain element of the technical provisions. The associated uncertainty of these provisions is assessed by all syndicates and also by the Society, using both quantitative techniques and qualitative commentary on sources of uncertainty. Consideration of the uncertainty is undertaken for each syndicate as part of their reserving processes. This will focus on the areas of particular uncertainty specific to each syndicate and involves statistical reserving techniques, sensitivity and scenario testing and consideration of large reserves associated with individual losses. This information is received and reviewed by Lloyd's as part of SAO and Actuarial Function reporting. Centrally the Lloyd's Actuarial Function assesses the uncertainty in aggregate market provisions via the same methodologies. Further assessment of quantitative uncertainty in the technical provisions is made as part of internal modelling at syndicate and Society level.

In addition to the quantification provided in the LIM, Lloyd's also monitors sources of uncertainty using the Statement of Actuarial Opinion (SAO) process. Each syndicate is required to provide an opinion, given by an actuary with an appropriate Practising Certificate, on reserve sufficiency. As part of this opinion any key sources of uncertainty are required to be highlighted and quantified. These uncertainties are highlighted in the solvency opinions by wordings; the wordings are comprised of an ascending order scale from 1 to 4 with respect to reserve uncertainty. The large loss wordings for 2021 year-end arose from three major CAT events, Hurricane Ida, US Winter Storm Uri and the European Floods, with losses concentrated in property (D&F) and property treaty lines.

#### Valuation differences of technical provisions by material line of business between Solvency II and UK GAAP

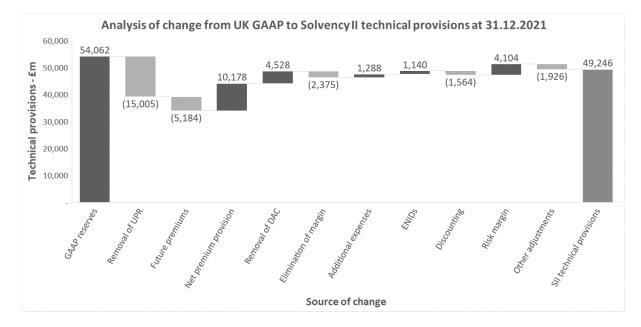
The technical provisions on a Solvency II basis are calculated in line with Solvency II requirements. There are a number of significant differences between this calculation basis and the UK GAAP basis underlying the financial statements.

The material differences in the bases are summarised below:

- Removal of the requirements to hold an unearned premium reserve (UPR) and to allow for other non-monetary items;
- Movement to a cashflow basis for valuation of both gross business and outwards reinsurance. This means that future premium income from contracts that are contractually bound at 31 December is introduced into the technical provisions;
- The claims associated with the unearned business must also now be included, in place of the UPR provision;

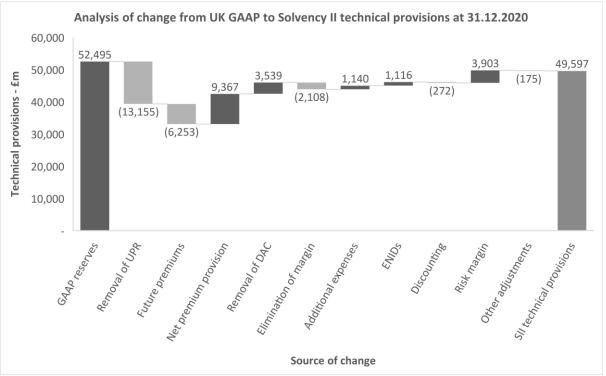
- Removal of any implicit or explicit margins within technical provisions to give a "true best estimate" for solvency purposes, defined as the mean of the full range of all possible future outcomes;
- Inclusion of all expenses incurred in running-off the existing business, rather than only those relating to cost of claims administration;
- Introduction of the valuation of very low probability extreme events including latent claims, referred to as "Events not in Data" (ENIDs);
- Introduction of discounting of all reserves at risk-free rates, rather than discounting being related to expected investment income and only being allowable on particular claim types; and
- Inclusion of a risk margin sufficient to cover the expected cost of transfer of the obligations.

The impacts of the above changes are summarised in the charts below:



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For Lloyd's the most material impact relates to the inclusion of future premium, though this is offset to an extent by future claims.

The UK GAAP and Solvency II net technical provisions by material line of business are summarised below:

Class	UK GAAP net technical provisions	Solvency II net technical provisions including risk margin*
	£bn	£bn
Accident & Health	2.36	1.65
Aviation	1.42	1.18
Casualty Financial & Professional Lines	11.39	10.79
Casualty Other	11.03	11.32
Casualty Treaty	3.67	3.37
Energy	3.16	5.07
Marine	5.37	4.99
Property (Direct & Facultative)	7.08	4.00
Property Treaty	5.10	6.19
Specialty Other	3.48	0.69
Total	54.06	49.25

31 December 2021

## 31 December 2020

Class	UK GAAP net technical provisions	Solvency II net technical provisions including risk margin*
	£bn	£bn
Accident & Health	3.11	2.94
Aviation	1.04	0.99
Casualty Financial & Professional Lines	9.86	9.61
Casualty Other	10.90	10.67
Casualty Treaty	4.15	3.82
Energy	3.11	2.51
Marine	5.19	7.28
Property (Direct & Facultative)	6.23	5.79
Property Treaty	5.19	4.07
Specialty Other	3.72	1.91
Total	52.50	49.59

<u>Matching adjustment (per Article 77b of Directive 2009/138/EC)</u> Lloyd's does not permit the use of the matching adjustment by syndicates in the setting of technical provisions.

<u>Volatility adjustment (per Article 77d of Directive 2009/138/EC)</u> Lloyd's does not permit the use of the volatility adjustment by syndicates in the setting of technical provisions.

# <u>Transitional risk-free interest rate-term structure (per Article 308c of Directive 2009/138/EC)</u>

Lloyd's does not permit the use of the transitional risk-free interest rate-term structure by syndicates in the setting of technical provisions.

<u>Transitional deduction (per Article 308d of Directive 2009/138/EC)</u> Lloyd's does not permit the use of the transitional deduction by syndicates in the setting of technical provisions.

<u>Recoverables from reinsurance contracts and special purpose vehicles</u> The technical provisions are calculated gross, with reinsurance calculated separately under the same Solvency II principles. All existing and planned future reinsurance purchasing related to the gross provisions is included in the technical provision calculation and associated recoveries resulting from consideration of the expected value of all possible future outcomes is considered. As part of consideration of reinsurance recoveries an allowance for non-payment is also required.

<u>Any material changes in assumptions for calculating technical provisions</u> There are no material changes to the assumptions compared to those used at the previous year-end.

## D.3 Liabilities other than technical provisions

<u>Valuation of other liabilities including differences between Solvency II and UK GAAP</u> A quantitative summary by major class is provided at the start of section D above. Solvency II requires that all liabilities should be measured at fair value. However, book value as per UK GAAP is used as a proxy for the fair value for Solvency II balance sheet purposes where the difference in valuation is not material.

#### Provisions other than technical provisions

These are liabilities of uncertain timing or amount (excluding liabilities reported under 'Pension benefit obligations').

There are no material differences in the valuation of 'provisions other than technical provisions' for Solvency II and UK GAAP.

#### Pension benefit obligations

Lloyd's operates a number of defined benefit and defined contribution pension schemes. The principal scheme is the Lloyd's Pension Scheme which is a defined benefit scheme. Other schemes have been established for certain employees based overseas. These have been valued in accordance with IAS19 Employee Benefits. There is no difference in the valuation for Solvency II purposes.

Additional information in respect of pension scheme obligations may be found in note 13 'Pension schemes' in the Society accounts, on pages 148 to 153 of Lloyd's Annual Report 2021.

#### Deposits from reinsurers

These are syndicate related amounts received from reinsurers or deducted by the reinsurer according to the reinsurance contract.

These are valued at fair value by discounting expected cash flows using a risk-free rate. However, book value as per UK GAAP is used as a proxy for the fair value for Solvency II balance sheet purposes where the impact of discounting is not material because the balances are due within one year or amounts due in more than one year are not material.

#### Financial liabilities, other than debts owed to credit institutions

Solvency II requires that lease liabilities arising from operating leases are recognised on the Solvency II balance sheet, consistent with the treatment under IFRS 16 -Leases. These liabilities are not recognised on the UK GAAP balance sheet.

#### **Deferred tax liabilities**

Deferred tax liabilities relate solely to the Society of Lloyd's. This is because syndicates account for their results gross of tax. Tax is assessed at member level and is outside of the scope of the Lloyd's financial statements. Deferred tax is measured on an undiscounted basis at the rates that are expected to apply in the periods in which timing differences reverse, based on tax rates and laws enacted or substantially enacted at the reporting date.

#### **Derivatives**

Derivatives have been valued at fair value for Solvency II purposes, which is consistent with UK GAAP.

#### Debts owed to credit institutions

This includes the Society's senior debt as well as syndicate level debts.

The Society's senior debt is restated to the fair value in accordance with Solvency II valuation principles. In the UK GAAP balance sheet the debt is carried at amortised cost.

Syndicate related debts include mortgages, loans, and bank overdrafts owed to credit institutions (excluding bonds held by credit institutions).

Solvency II requires that all such liabilities should be measured at fair value. Hence, these are valued at fair value by discounting expected cash flows using a risk-free rate. However, book value as per UK GAAP is used as a proxy for the fair value for Solvency II balance sheet purposes where the impact of discounting is not material because the balances are due within one year or amounts due in more than one year are not material.

#### Insurance & reinsurance payables

These are valued at fair value by discounting expected cash flows using a risk-free rate. However, book value as per UK GAAP is used as a proxy for the fair value for Solvency II balance sheet purposes where the impact of discounting is not material because the balances are payable within one year or amounts payable in more than one year are not material.

#### Payables (trade, not insurance)

Book value as per UK GAAP is used as a proxy for the fair value for Solvency II balance sheet purposes where the impact of discounting is not material because the balances are due within one year or amounts due in more than one year are not material.

#### Subordinated liabilities

As at 31 December 2021, Lloyd's had two subordinated debt issues in place. Please refer to section E.1 for more details.

For Solvency II purposes, the debt is shown at fair value within Tier 2 capital.

#### Any other liabilities

Book value as per UK GAAP is used as a proxy for the fair value for Solvency II balance sheet purposes where the impact of discounting is not material because the balances are due within one year or amounts due in more than one year are not material.

#### <u>Leases</u>

Payments made under operating leases are charged to the Society income statement on a straight-line basis over the period of the lease. Contractual capital expenditure is provided for over the term of the underlying lease agreement. The lease cost provision is an accounting estimate which arises due to the fact the Society has entered into a number of fully repairing leases.

Additional information on lease cost provisions and operating lease commitments for the Society is set out in notes 16 and 25 of the Society accounts at pages 155 to 157 and 168 of Lloyd's Annual Report 2021 respectively.

## D.4 Alternative methods for valuation

As described in section D.1 above, Lloyd's uses market value i.e. based on quoted prices from custodians to value investments such as government and corporate bonds. However, where these are not considered current, a tradable quote from a broker is sought.

# D.5 Any other information

There is no other material information to disclose.

## E Capital Management

Sections/items indicated with an asterisk (\*) are not subject to reasonable assurance.

## E.1 Own funds

Lloyd's market wide SCR and central SCR\*

The Society and the Lloyd's market are regulated by the PRA in accordance with the requirements of the Solvency II regime as 'the association of underwriters known as Lloyd's'.

Lloyd's must calculate and cover two SCRs, given the unique structure of Lloyd's: the Lloyd's market wide SCR and the central SCR. Under the Solvency II regime, it must then ensure that each SCR is covered by eligible capital.

The Lloyd's market wide SCR ("MWSCR") is calculated to cover all the risks of 'the association of underwriters known as Lloyd's', i.e. those arising on syndicate activity, members' capital provided at Lloyd's and the Society taken together, at a 99.5% confidence level over a one-year time horizon as provided for in Solvency II legislation. All the capital of the component parts of the market taken together are available to meet the MWSCR.

The Lloyd's central SCR ("central SCR") is calculated in respect of only the risks facing the Corporation and the Central Fund at the same confidence level and time horizon used to calculate the MWSCR. The material risk is that members do not have sufficient funds to meet their underwriting losses even having complied with Lloyd's rigorous capital setting rules. In such an event, assets from the Central Fund can, at the discretion of the Council, be made available to ensure that policyholders' claims are met. Only eligible capital held by the Society may be used to cover the central SCR.

The MWSCR and central SCR are both calculated in accordance with the Lloyd's Internal Model (LIM) which was last approved by the PRA in December 2021.

The quantitative reporting templates presented in appendix 1 reflect the market wide balance sheet and solvency position.

#### Objectives, policies and processes for managing own funds

Lloyd's sets medium and long term financial objectives in accordance with among other things, its business objectives, the underwriting environment, broader economic conditions as well as the UK and global regulatory environment and future developments. As part of this work, Lloyd's sets risk appetites in terms of coverage of market wide and central regulatory solvency and economic capital requirements. The calibration of these is reviewed regularly by senior management. This is articulated through Lloyd's risk management strategy and appetite and, in particular, the Medium-Term Capital Management Plan (MTCMP) and ORSA report. Lloyd's Capital Management Policy has been designed to ensure that these objectives, once set, can be complied with through capital management. The coverage of the regulatory and economic target capital requirements is assessed on at least a quarterly basis.

The MTCMP is prepared to assist Lloyd's management in ensuring that it has sufficient capital centrally and across the Lloyd's market, in terms of both quantity and quality (tiering) to be able to meet its current and projected regulatory and economic capital requirements in the medium term (over a three-year horizon). From the 2022 year of account Lloyd's has revised its Membership & Underwriting Conditions and Requirements such that members are only required to formally come into line once per year, rather than twice per year as has been the case historically. In addition, Lloyd's has introduced a quarterly corridor test to ensure members remain adequately capitalised through the remainder of the year. The quarterly corridor test requires members to provide additional capital where they are below the minimum level of the corridor and only allows capital to be withdrawn to the extent a member's surplus is above the maximum level of the corridor. There have been no other material changes to Lloyd's processes for managing own funds during 2021.

#### Ensuring minimum Tier 1 levels to cover the Lloyd's SCR

Under Solvency II, the SCR must be covered by at least 50% Tier 1 capital. As agreed with the PRA, this test applies to the Lloyd's SCR, which covers the 1 in 200year loss to the 'association of underwriters known as Lloyd's' (as calculated using the LIM 'capital burn' test), as well applying a similar test to the central SCR which addresses the central capital requirement of the Society.

Most own funds at Lloyd's are Tier 1 but as described below letters of credit (LOCs), guarantees and life policies provided as members' FAL, and the dated subordinated debt issued in 2014 and 2017, constitute Tier 2 assets. The deferred tax asset is classified as Tier 3.

Lloyd's has implemented a policy whereby each member's capital requirement must be covered by at least 50% Tier 1 capital in order to align members' capital requirements with Solvency II regulations. Lloyd's monitors the composition of its capital in terms of amount and quality on an ongoing basis. If coverage of this test becomes marginal, then Lloyd's has in place procedures to require members which make the greatest use of Tier 2 capital within their FAL to substitute part of this with Tier 1 capital.

The coverage of the SCR by Tier 1 capital (as reported on template S.23.01 in Appendix 1) is summarised below:

	Dec 2021	Dec 2020
	£m	£m
Lloyd's SCR*	19,900	20,341
Tier 1 capital	27,442	22,263
Tier 1 capital %	138%	109%

The tiering test also applies to the central SCR. Lloyd's applies similar procedures to monitor the quality of central capital in this respect.

## Own funds classified by tier

A summary of Lloyd's own funds is set out below. The total own funds available to meet the Lloyd's SCR agrees to template S.23.01 R0500:

31 December 2021	Tier 1	Tier 2	Tier 3	Total
	£m	£m	£m	£m
Syndicate assets	704			704
Members' funds at Lloyd's (FAL)	24,491	6,789		31,280
Society assets:				
Subordinated debt		871		871
Deferred tax			101	101
Balance of net assets	2,247			2,247
Total own funds available to meet the SCR	27,442	7,660	101	35,203
Lloyd's SCR*				19,900
'Excess' own funds not eligible to meet SCR	-	-	-	-
Total market wide own funds eligible to meet the SCR	27,442	7,660	101	35,203
Lloyd's market wide solvency ratio				177%

31 December 2020	Tier 1	Tier 2	Tier 3	Total
Syndicate assets	(4,218)			(4,218)
Members' funds at Lloyd's (FAL)	24,372	6,576		30,948
Society assets:				
Subordinated debt		919		919
Deferred tax			102	102
Balance of net assets	2,109			2,109
Total own funds available to meet the SCR	22,263	7,495	102	29,860
Lloyd's SCR*				20,341
'Excess' own funds not eligible to meet SCR	-	-	-	-
Total market wide own funds eligible to meet the SCR	22,263	7,495	102	29,860
Lloyd's market wide solvency ratio				147%

# Total **available** own funds as at 31 December 2021 compared with 31 December 2020 are summarised below:

	Tier 1	Tier 2	Tier 3	Total
	£m	£m	£m	£m
31 December 2021	27,442	7,660	101	35,203
31 December 2020	22,263	7,495	102	29,860

Total own funds increased from 31 December 2020 to 31 December 2021 as a result of a reduction in the SCR due to a Major Model Change Application; and an increase in assets due to increased profitability, greater Funds At Lloyd's and higher discount rates driving lower technical provisions.

## Syndicate assets

Syndicate assets are the aggregated own funds of all syndicates, net of anticipated profit releases and ring-fenced funds. All syndicate assets are held in the form of on balance sheet items and meet the criteria of Tier 1 basic own funds.

#### Members' FAL

FAL provided in the form of cash and investments constitute on balance sheet items and meet the criteria of Tier 1 basic own funds.

A significant proportion of FAL is provided in ancillary own funds, in particular 'letters of credit and guarantees which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC' which are classified as Tier 2 ancillary own funds in accordance with Article 96 (2) of the Solvency II Directive.

Whilst letters of credit are considered Tier 2 own funds for solvency purposes and are subject to restriction on coverage of the solvency capital requirement, when called upon they are fully converted into cash which is Tier 1 own funds. In addition, prior to Lloyd's accepting a letter of credit into FAL, a robust assessment of the creditworthiness of the respective financial institution is performed, considering both qualitative and quantitative factors.

As described below, these ancillary own funds are subject to prior approval by the PRA and are reported as Tier 2 ancillary own funds in accordance with the valuation rules provided by the PRA's approval.

#### Society assets

As at 31 December 2021 Lloyd's had two subordinated debt issues in place:

- The Sterling 2014 Notes issued in October 2014 classified as Tier 2 basic own funds under Solvency II.
- The Sterling 2017 Notes issued in February 2017 also classified as Tier 2 basic own funds under Solvency II.

All other Society assets are classified as Tier 1 basic own funds, with the exception of deferred tax assets which are Tier 3 basic own funds.

#### Reconciliation reserve

The amount of the reconciliation reserve reported at R0760 of template S.23.01 (Appendix 1) is  $\pounds(846)m$  (2020:  $\pounds(7,114)m$ ). This is comprised of:

	Dec	2021	Dec 2	2020
	£m	£m	£m	£m
Syndicate balances per PFFS <sup>1</sup> before				
deducting:	2,208		(326)	
<ul> <li>Solvency II valuation adjustments</li> </ul>	(576)		(2,567)	
- Members' funds in syndicate (within				
R0730)	(3,797)		(5,005)	
- Foreseeable distributions (R0720)	(435)		(918)	
<ul> <li>Ring-fenced funds (within R0740)*</li> </ul>	(493)		(407)	
		(3,093)		(9,223)
FAL per PFFS <sup>1</sup> before adjusting:	31,272		30,959	
<ul> <li>Solvency II valuation adjustments</li> </ul>	8		-	
<ul> <li>Ancillary own funds at UK GAAP</li> </ul>				
valuation	(6,789)		(6,587)	
- Other FAL (within R0730)	(24,491)		(24,372)	
Society net resources per PFFS <sup>1</sup> before				-
deducting	3,073		3,308	
- Solvency II valuation adjustments	146		(178)	
<ul> <li>Subordinated debt (at fair value)</li> </ul>	(871)		(919)	
<ul> <li>Deferred tax asset (within R0730)</li> </ul>	(101)		(102)	
<ul> <li>Ring-fenced funds (within R0740)*</li> </ul>	(101)		(102)	
	-	2,247	-	2,109
Total		(846)		<b>(7,114)</b>

<sup>1</sup> Pro Forma Financial Statements, page 33 of Lloyd's Annual Report 2021

Coverage of the Lloyd's SCR with eligible own funds

In accordance with Solvency II rules, the SCR must be covered with at least 50% Tier 1 own funds. Accordingly, the amount of available Tier 2 and Tier 3 own funds which exceeds 50% of the SCR is not eligible to cover the SCR and cannot be calculated as such in the solvency calculation.

This has the potential to impact the Lloyd's solvency ratio calculation as a large part of Lloyd's capital is provided by ancillary own funds which are treated as Tier 2 capital for Solvency II purposes. However, these are assets callable on demand. When called, the proceeds, namely cash, would qualify as Tier 1 capital. Under these circumstances, any amount of Tier 2 capital represented by these assets ineligible to meet the SCR (since they exceed the 50% tiering limit for Tier 2 and Tier 3 Capital set by Solvency II) would then become fully eligible. As at 31 December 2021 the amount of ineligible Tier 2 and Tier 3 capital was £nil (2020: £nil). Own funds available to meet the Central SCR

31 December 2021	Tier 1	Restricted Tier 1	Tier 2	Tier 3	Total
	£m	£m	£m	£m	£m
Society assets:					
Subordinated debt			871		871
Deferred tax				101	101
Balance of net assets	2,240	385			2,625
Callable layer*	1,605				1,605
Total central own funds available to meet the SCR	3,845	385	871	101	5,202
Central SCR*					1,250
'Excess' central own funds not eligible to meet central SCR	-	-	(246)	(101)	(347)
Total central own funds eligible to meet the SCR	3,845	385	625	-	4,855
Central solvency ratio					388%

31 December 2020	Tier 1	Restricted Tier 1	Tier 2	Tier 3	Total
	£m	£m	£m	£m	£m
Society assets: Subordinated debt Deferred tax Balance of net assets Callable layer* Total central own funds available	2,107 817	416	919	102	919 102 2,523 817
to meet the SCR	2,924	416	919	102	4,361
Central SCR*					2,085
'Excess' central own funds not eligible to meet central SCR	-	-	-	-	-
Total central own funds eligible to meet the SCR	2,924	416	919	102	4,361
Central solvency ratio					209%

## Callable layer\*

The Society has the right to make a call on members of up to 5% of members' premium limits ("callable contributions"). The callable contributions can be drawn from members' premiums trust funds without the members' consent. This would result in the transfer of Tier 1 capital from syndicate funds to central resources. The value assigned to the callable layer has been reduced to reflect that part of the callable layer which would not be available in a stressed situation at the central SCR level of confidence. The callable layer has been increased to 5% from 3% for the 2022 and subsequent years of account.

#### Coverage of the central SCR with eligible central own funds

The capital tiering rules also apply to the coverage of the central SCR. The inclusion of the Tier 2 subordinated debt increases Lloyd's Tier 2 and 3 central capital by

£972m. Up to  $\pounds$ 625m – 50% of  $\pounds$ 1,250m - of this is eligible in the solvency calculation.

Eligible amount of basic own funds to cover Minimum Capital Requirement, classified by tiers

The table below sets out Lloyd's eligible basic own funds to meet the MCR. The total agrees to template S.23.01 R0550:

31 December 2021	Tier 1	Tier 2	Tier 3	Total
	£m	£m	£m	£m
Syndicate assets	704			704
Members' funds at Lloyd's	24,491			24,491
Society assets:				
Subordinated debt		871		871
Balance of net assets excluding deferred tax	2,247			2,247
Total basic own funds eligible to meet the MCR	27,442	871		28,313

31 December 2020	Tier 1	Tier 2	Tier 3	Total
	£m	£m	£m	£m
Syndicate assets	(4,218)			(4,218)
Members' funds at Lloyd's	24,372			24,372
Society assets:				
Subordinated debt		919		919
Balance of net assets excluding deferred tax	2,109			2,109
Total basic own funds eligible to meet the MCR	22,263	919		23,182

Differences between equity as shown in the financial statements and the excess of assets over liabilities for solvency purposes

31 December 2021	Synds	FAL	Soc <sup>1</sup>	Total
	£m	£m	£m	£m
Capital, reserves and subordinated debt Per PFFS balance sheet (UK GAAP basis) <sup>2</sup>	2,208	31,272	3,073	36,553
Solvency II adjustments: Syndicate and FAL valuation adjustments	(576)	8		(568)
FAL valuation adjustments re ancillary own funds		(6,789)		(6,789)
Society valuation adjustments			146	146
Subordinated debt at fair value			(871)	(871)
Solvency II excess of assets over liabilities (S.02.01.02 R1000)	1,632	24,491	2,348	28,471

31 December 2020	Synds	FAL	Soc <sup>1</sup>	Total
	£m	£m	£m	£m
Capital, reserves and subordinated debt Per PFFS balance sheet (UK GAAP basis) <sup>2</sup>	(326)	30,959	3,308	33,941
Solvency II adjustments: Syndicate valuation adjustments	(2,567)			(2,567)
FAL valuation adjustments re ancillary own funds		(6,587)		(6,587)
Society valuation adjustments Subordinated debt at fair value (			(178) (919)	(178) (919)
Solvency II excess of assets over liabilities (S.02.01.02 R1000)	(2,893)	24,372	2,211	23,690

<sup>1</sup> Society: Corporation and Central Fund (including subordinated debt)

<sup>2</sup> Lloyd's Pro Forma Financial Statements, page 33 of Lloyd's Annual Report 2021

## Syndicate valuation adjustments

A key difference from the valuation basis for the financial statements (i.e. UK GAAP basis) compared to Solvency II is the valuation of technical provisions. This involves moving from the 'prudent undiscounted best estimate' basis of valuation used in UK GAAP to a market consistent basis of valuation based on a probability weighted best estimate (therefore stripping out surplus reserves held in syndicate accounts) less discounting for the time value of money, with a risk margin applied on top. In addition, there are differences arising due to the recognition of contract boundaries and reinsurance costs.

Other valuation differences may arise in respect of investments (measured at fair value rather than amortised cost) and recognising the fair value of debtors and creditors due after one year (by discounting them where material for the time value of money).

In addition, the managing agent profit commission must be recalculated as if it was charged on the Solvency II result.

As at 31 December 2021 the net valuation differences in this respect amounted to a negative adjustment of  $\pounds(576m)$  (2020:  $\pounds(2,567)m$ ).

#### FAL valuation adjustments regarding ancillary own funds (AOF)

FAL treated as ancillary own funds does not appear on the Solvency II balance sheet but instead the eligible amount in line with the valuation rules applied by the PRA is reflected in the own funds template S.23.02.

Accordingly, £6,789m (2020: £6,587m) (in accordance with their UK GAAP valuations) has been derecognised on the Solvency II balance sheet:

AOF item	Dec 2021	Dec 2020
	£m	£m
Letters of credit and guarantees in accordance with Article 96 (2) of Directive 2009/138/EC	6,770	6,566
Life policies	19	21
Total	6,789	6,587

Society valuation adjustments

The increase in Society assets for solvency purposes is summarised below:

Item	Dec 2021	Dec 2020
	£m	£m
Lloyd's investments (Nelson collection) (due to uncertainty over fair value)	(15)	(15)
Plant & machinery (as not valued on a 'fair value' basis)	(10)	(13)
Intangible assets (not eligible under Solvency II)	(58)	(54)
Provision for Centrewrite MCR (as Centrewrite's assets are included in the aggregate Society accounts)	(3)	(3)
Senior debt valuation difference	(15)	(37)
IFRS 16 adjustment	(8)	(4)
Valuation of investment in subsidiaries	(55)	(98)
Deferred tax effect of Solvency II valuation differences	43	46
Central adjustment	267	-
Total	146	(178)

## Subordinated debt

The subordinated debt is comprised of the Sterling 2014 Notes and Sterling 2017 Notes.

The notes are subordinated obligations of the Society. Each tranche of the notes will rank pari-passu with the other in a winding-up of the Society. Upon the occurrence of any winding-up proceedings of the Society, payments on the notes will be subordinated in right of payment to the prior payment in full of all other liabilities of the Society, except for liabilities which rank equally with or junior to the notes. Payments on the notes will also be subordinated to certain payments which may be made out of central assets including payments made to discharge the liabilities of an insolvent member to any person (including any policyholders) arising out of, or in connection with, insurance business carried on at Lloyd's by that insolvent member and payments made in respect of the costs required by or under any insolvency procedure to which the Society or the Lloyd's market may be subject. However, in the event of a winding-up of the Society, the claims of the holders of the Notes rank senior to the distribution of any central assets to members of Lloyd's generally (other than payments made to members in their capacity as senior creditors of the Society).

The Sterling 2014 Notes issued on 30 October 2014 mature on 30 October 2024 and bear interest at a rate of 4.75% per annum, payable annually in arrears on 30 October in each year.

The Sterling 2017 Notes issued on 7 February 2017 mature on 7 February 2047 and bear interest at a rate of 4.875% per annum, payable annually in arrears on 7 February in each year.

The subordinated debt is shown as a liability at book value in the Pro Forma Financial Statements. For Solvency II purposes, it is shown at fair value within Tier 2 capital.

Basic own fund items subject to transitional arrangements referred to in Articles 308b(9) and 308b(10) of Directive 2009/138/EC

As at 31 December 2021 Lloyd's does not have any own fund items subject to transitional arrangements.

<u>Ancillary own funds – amount, method and counterparty details for items referred to</u> <u>in points (a), (b) and (c) of Article 89(1) of Directive 2009/138/EC</u> A significant proportion of Lloyd's own funds are provided in the form of ancillary own funds (AOF) provided within members' FAL.

AOF are subject to prior supervisory approval before they may be treated as available capital under Solvency II. Consistent with this, Lloyd's submitted an application to the PRA for approval of AOF in November 2021. The PRA subsequently granted approval of this application on 15 December 2021, amounting in total to £6,803m. The approval, including the conditions of subsequent valuations of AOF, was published in the PRA's written notice 00003675. The approval applies until 31 December 2025. This approval replaces a previous approval in this respect granted by the PRA in June 2021.

As set out in the written notice, the PRA provided approval in respect of 1,107 letters of credit, bank guarantees and insurance company guarantees ('guarantee items'), and 84 life policy items. Details of each counterparty are not disclosed in the written notice or the SFCR as they represent confidential arrangements between the member concerned and the counterparty providing the AOF instrument.

If any of the AOF items are called they would be converted into cash, a Tier 1 basic own funds item.

The table below summarises Lloyd's AOF and the valuation of these as at 31 December 2021 consistent with the valuation rules contained within the PRA's most recent approval of these. These amounts appear on template S.23.01 provided in Appendix 1.

Tier 2	Dec 2021	Dec 2020
	£m	£m
Letters of credit and guarantees in accordance with Article 96 (2) of Directive 2009/138/EC	6,770	6,566
Life policies	19	21
Total ancillary own funds	6,789	6,587

Letters of credit and guarantees in accordance with Article 96 (2) of Directive 2009/138/EC

Certain members provide capital in the form of letters of credit and guarantees held in trust by Lloyd's to support FAL. This form of capital is consistent with 'letters of credit and guarantees which are held in trust for the benefit of insurance creditors by an independent trustee and provided by credit institutions authorised in accordance with Directive 2006/48/EC' (which is treated as Tier 2 capital per Article 96 (2) of the Directive).

#### Letters of Credit (LOCs)

LOCs provided as FAL are in a Lloyd's standard form, and constitute a clean, irrevocable and unconditional standby credit which can be drawn down on demand. No substantive alterations to the form of the LOC can be made without consultation and notification to the PRA/FCA. Lloyd's has made conditions and requirements which must be met in order for a LOC to be admissible for FAL.

The parties to the LOC are Lloyd's (as beneficiary) and the approved credit institution. If the LOC has been confirmed by a UK credit institution (which would be the case if the issuing bank is outside of the UK) then Lloyd's contractual relationship will be with the confirming bank; if the LOC is not confirmed (because the issuing bank is in the UK), then Lloyd's contractual relationship will be with the issuing bank. Either way, both parties to the LOC will be in the UK. Moreover, all LOCs must be governed by English law and subject to the jurisdiction of the English court, as per the M&URs and the wording of the standard form LOC itself.

Some LOCs are provided on a syndicated basis, in which case Lloyd's would call on the agent bank. The contractual relationship is as described above.

#### **Guarantees**

Guarantees provided as FAL are in a Lloyd's prescribed form, which cannot be changed without consultation with and notification to the PRA/FCA. Lloyd's has made conditions and requirements which must be met in order for a guarantee to be admissible for FAL. The process for drawing on a guarantee is slightly different to that for a LOC – the wording of the guarantee states that a demand can be made any time after the Principal (i.e. the member) is in default under the Security and Trust Deed under which the guarantee is held. The Principal would be in default if a demand for payment under the Trust Deed has been made and not met in accordance with its terms.

The parties to the guarantee are Lloyd's (as beneficiary) and the issuing entity.

In order to issue a guarantee an entity must be approved by Lloyd's – the criteria for approval include (inter alia) that a guarantee must be issued or confirmed out of London (although elsewhere in the UK (e.g. Manchester) has also been accepted). As with LOCs, this is a Lloyd's requirement and the wording of the guarantee itself states that the guarantee is subject to English law and the exclusive jurisdiction of the English court.

Sometimes a joint guarantee is provided in which case Lloyd's would call on the agent bank. The contractual relationship is as described above.

#### Life policies

Certain members provide FAL in the form of life policies. Lloyd's sets out conditions for these to be eligible as FAL. These include that the policy is assigned to Lloyd's, which is achieved through the execution by the member of a Deed of Assignment in favour of Lloyd's. Notice of the assignment is then given by Lloyd's to the life company which issued the policy, and acknowledgement of the same requested from the life company.

As a result of the assignment, the owner of the policy – as far as the life company is concerned – is Lloyd's. The relevant parties to the arrangement are therefore Lloyd's and the life company.

The life policies will be subject to the law of the jurisdiction in which they were issued, which in most cases will therefore be English law. In each case, Lloyd's requires the life company to advise which local jurisdiction the company is governed to transact life assurance business, and also to confirm that it is authorised to transact such business in the UK. The deed of assignment by which the policies are transferred to Lloyd's ownership are governed by English law and jurisdiction, and the assignment will have been acknowledged by the life company, and as such there are no concerns as to whether Lloyd's has properly acquired the benefit of them.

## Syndicate loans to the Central Fund

The Society has issued three tranches of syndicate loans to the Central Fund ("syndicate loans"). Such capital items are subject to prior supervisory approval before they may be treated as available capital under Solvency II. The PRA has granted Lloyd's approval to classify the syndicate loans as restricted Tier 1 capital as set out in the following table.

Tranche	Amount of rT1 capital approved collected	Net amount included in Central own funds	PRA written notice reference number
29 March 2019	£110m	£83m	5082589
26 June 2020	£120m	£90m	5508334
6 November 2020	£284m	£212m	00001850
Total	£514m	£385m	

Other than on the winding-up of the Society, it has no obligation to repay any syndicate loan at any time. The Society may, at the discretion of the Council, only once a period of at least five years has elapsed after the date of collection of the syndicate loan for any year of account, or at any later point in time, repay the whole or any part of any syndicate loan in respect of that year of account at such time or times as the Council thinks fit provided its market wide and central SCRs are exceeded by an appropriate margin and subject to the approval of the PRA.

Interest is payable on the syndicate loans at the discretion of the Council. Where an interest payment is cancelled by the Council the Society has no obligation to pay that interest.

The syndicate loans are subordinated to:

- all other obligations of the Society except those which are expressed to rank equally with or in subordination to syndicate loans; and
- the payment of any underwriting liabilities of members (or former members of Lloyd's or the estates of deceased members of Lloyd's) for which the Central Fund or other assets of the Society may at any time, in the discretion of the Council, be applied;
- but rank in priority to the distribution of any remaining assets of the Society to members of the Society in their capacity as members of the Society.

The Society shall have no liability to repay any syndicate loan or to pay any interest on an syndicate loan, including any repayment or payment of interest previously promised by the Society, where there is non-compliance with the Society's market wide or central SCR, or where redemption or payment of interest would lead to such non-compliance.

Items deducted from own funds and significant restrictions affecting availability and transferability of own funds

## Foreseeable distributions

The amount of £435m (2020: £918m) reported on R0720 'Foreseeable dividends, distributions and charges' on template S.23.01 represents the net amount available to be distributed to inactive Lloyd's members in the capital tests. The capital test calculates the amount of funds that each member needs to hold at Lloyd's to cover

its capital requirement and any underwriting liabilities. Only any excess over this amount is available for distribution to the member.

## Ring fenced funds\*

Ring fenced funds arise where an asset is not considered to be freely available to meet all liabilities and thus must be deducted from available own funds.

Lloyd's has conducted a review of syndicate overseas trust funds to assess whether any constitute a ring-fenced fund. Where this conclusion has been reached, they are excluded from available own funds to meet the Lloyd's SCR. The amount in total in this respect is £493m (2020: £407m) as reported on R0740 at template S.23.01 in Appendix 1.

## Restriction to availability of Syndicate loan capital

The syndicate loans are deemed to be hybrid capital instruments which generate a tax charge on write down. In accordance with Supervisory Statement 3/15, the maximum tax charge generated on write-down must be deducted in calculating central own funds to reflect the reduced loss absorbency of the loans. At 31 December 2021 the substantially enacted rate of tax was 25% and the deduction amounted to £129m (2020: £98m). Therefore, the net contribution to central own funds at 31 December 2021 from the syndicate loans amounted to £385m (2020: £416m).

## E.2 Solvency Capital Requirement\* and Minimum Capital Requirement

Amount of Solvency Capital Requirement\* and Minimum Capital Requirement The table below shows the total SCR and MCR as at 31 December 2021.

	Dec 2021	Dec 2020
	£m	£m
Lloyd's MWSCR*	19,900	20,341
Lloyd's MCR	8,955	8,818
Central SCR*	1,250	2,085

The final amounts of the Lloyd's MWSCR and central SCR are subject to supervisory assessment.

<u>Solvency Capital Requirement split by risk categories\*</u> The table below shows the risk categories that make up the Lloyd's MWSCR:

Component description	Dec 2021	Dec 2020
	£m	£m
Reserving risk	7,550	7,790
All other (attritional) underwriting risk	7,822	8,248
Catastrophe risk	802	1,357
Market risk	2,304	2,389
Reinsurance credit risk	728	836
Operational risk	431	893
Pension risk	35	40
MWSCR before adjustments	19,672	21,553
Foreign exchange adjustment	228	(1,212)
MWSCR	19,900	20,341

An analysis of the Lloyd's SCR by component as agreed with the PRA is provided at template S.25.03 (see Appendix 1).

## Simplified calculations used in standard formula

Lloyd's SCR is calculated using an internal model thus this is not applicable to Lloyd's.

<u>Undertaking specific parameters used in standard formula</u> Lloyd's SCR is calculated using an internal model thus this is not applicable to Lloyd's.

Option provided for in third subparagraph of Article 51(2) of Directive 2009/138/EC Lloyd's SCR is calculated using an internal model thus this is not applicable to Lloyd's.

Impact of undertaking specific parameters required in accordance with Article 110 of Directive 2009/138/EC

Lloyd's SCR is calculated using an internal model thus this is not applicable to Lloyd's.

<u>Inputs to calculate the Minimum Capital Requirement</u> The Lloyd's Minimum Capital Requirement has been calculated in accordance with the input elements as specified on template S.28.02 (see Appendix 1).

Changes to the SCR\* and MCR during the reporting period

The MWSCR\*, central SCR\* and MCR as at 31 December 2021 and 31 December 2020 are summarised below:

	Dec 2021	Dec 2020
	£m	£m
MWSCR*	19,900	20,341
Central SCR*	1,250	2,085
MCR	8,955	8,818

The large decrease in Central SCR since the previous year end is driven by the approval of the Major Model Change Application in December 2021 which incorporated model changes that better reflect the current risk profile of the Central Fund, including the benefit of the Central Fund cover, which is a cover purchased by Lloyd's to indemnify the Central Fund against excess Member losses.

The decrease in the MWSCR is proportionately less material as Central Fund risks are a smaller proportion of the MWSCR. It is further noted that higher profitability due to favourable emerging experience over the year, and the increased interest rate environment acts to reduce both SCRs compared to the previous year end offsetting increase from significant market growth.

The MCR is calculated formulaically based on premiums and technical provisions. The MCR has increased over 2021 as a result of the increase in net technical provisions during 2021.

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

Lloyd's has not used this in the calculation of the SCR.

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

<u>Uses of Lloyd's Internal Model (LIM)</u> The table overleaf lists out the various purposes of the LIM.

Ref	Model Use
	Calculate Lloyd's Society Regulatory Capital Requirements
1a	The LIM is used to calculate the Solvency II SCR for the Lloyd's Society, for both of: i. the market as a whole; known as "Market Wide SCR" calculation, and; ii. the Central Fund only; known as "Central SCR" calculation.
	The main output is a breakdown of the SCR's by risk type on a diversified and undiversified basis. Additional levels of granularity are sometimes used when interrogating the model or providing specific output for other model users.
	Support Lloyd's regulatory reporting requirements including ORSA
	The LIM is used to support the regulatory reporting requirements, where the use of output of the model is used to satisfied Solvency II Pillar 3 requirements.
1b	The capital and solvency position of Lloyd's is reported in the annual and quarterly Lloyd's Society Own Risk and Solvency Assessment (ORSA) report. The ORSA is an ongoing process within Lloyd's and contributed to by several Functions, culminating in quarterly and annual reports to the Risk Committee and Council. It incorporates a series of processes which ensure an appropriate level and quality of capital is maintained to support the risks taken within Lloyd's on a current and future basis, in light of Lloyd's strategy set by the Council.
	Setting economic capital at a central level
2	The LIM is also used to calculate the Economic Capital Requirements for Lloyd's at a central level and is shown in the annual ORSA report. The central Economic Capital Requirement is calculated using the Central SCR, to ultimate, as a base. A series of buffers and allowances are then added/subtracted.
	Market event impact analysis
3	The LIM is used to estimate the potential effect of a market event to the London Market. This analysis also produces various natural catastrophe related risk appetite metrics which are presented as part of the ORSA.
	Support monitoring of Lloyd's Society risk appetites
	Lloyd's risk appetites are an articulation of the level of risk-taking which the Council deems to be acceptable for Lloyd's. The risk appetite framework is the key tool used to monitor Lloyd's risk profile at a market and Corporation level.
4	Risk appetite statements have been defined for each material risk area and are split according to whether they are Market or Corporation risks. All risk appetite metrics are reported to the Risk Committee and Council as part of the annual ORSA.
	A number of the risk appetite metrics are produced using output from the LIM and use varying levels of granularity in LIM output, from high level SCR figures to individual risk type output.
	Stress and Scenario Testing
5	Stress and scenario testing ('SST') is used to validate the model as part of the annual validation process and also forms part of the annual ORSA. The scenarios demonstrate the resilience of the market and Lloyd's ability to withstand financial impact. Experts across the business determine the impact and return period of the scenarios on a best effort basis which is then compared against outputs from the LIM. Included within SST is a forward-looking assessment of the central SCR which looks at a range of plausible market conditions over the next three years.
	Monitor and manage risk aggregations (catastrophe exposures)
6	The Lloyd's Catastrophe Model provides a probabilistic view of Lloyd's Catastrophe risk, losses arising from natural catastrophes for the Lloyd's Market. This is allows for the aggregate Market catastrophe risk to be monitors, and assists in the review of syndicate compliance with the Lloyd's Principles for Doing Business. Various catastrophe related risk appetite metrics are presented as part of the quarterly ORSA.

Ref	Model Use
	Monitor and manage investment risk for Central Fund assets
7	Central Fund (CF) assets are invested centrally by Treasury & Investment Management (LTIM). The Lloyd's Investment Risk Model is one of the primary tools used to support the management of investment risk for this portfolio. The risk appetite is expressed in the form of a value at risk (VAR) budget. LIRM calculates VAR on a monthly basis, so asset risk can be monitored and reported against appetite. Various risk appetite metrics are presented as part of the quarterly ORSA.
	Manage operational risk
8	This use ensures that the operational risks to Lloyd's are captured in Operational risk scenarios and approved by the Executive Risk Committee (ERC) annually, including the impact that these scenarios have to the central Lloyd's SCR.
	Strategic business decisions
	The model may be used for a wide variety of strategic business decisions as required.
9	For example, new syndicate risk assessment, investigation of reinsurance purchase to protect the central fund losses and use of the LIRM to inform and support investment decisions (outside of the Central Fund) such as investigation of target asset allocation for the market.
	Examples of the model being used to support strategic decisions should be captured under this use, and as such may include uses with the Development model where we are assessing a change to the business that may require a model change.

# Scope of internal model in terms of business units and risk categories

The scope of Lloyd's internal model can be categorised into three areas:

- Syndicate risks;
- Member risks; and
- Society risks.

## Syndicate risks

Syndicates are the source of the majority of risks. They are the source of all the insurance business; manage the bulk of the asset portfolios; hold the majority of the counterparty exposures; and conduct most of the operational day-to-day operational activity.

The syndicate risks include:

- Insurance risk;
  - Reserve risk;
  - Underwriting risk;
  - Natural catastrophe risk ("catastrophe risk");
  - All other risks ("attritional risk");
- Market risk;
  - On syndicate assets (including credit risk on Premiums Trust Funds);
  - On syndicate liabilities;
- Credit risk;
- Syndicate operational risk; and
- Liquidity risk.

## Member risks

Members provide capital (FAL), in a variety of forms to support syndicates' risks; and present asset related risks which are dependent on characteristics of assets used to meet their FAL. Members are exposed to market risk (including credit risk) on FAL.

## Society risks

Central level risks include:

- Member deficits arising from syndicate risks including Additional Central Fund risk (ACF);
- Central operational risk;
- Market risk (including credit risk) on central assets; and
- Pension fund risk resulting in deficit requiring funding from central assets.

Integration of the techniques to integrate any partial internal model with the standard formula

The LIM is a full internal model so this is not applicable.

# Methods used for the calculation of the probability distribution forecast and the Solvency Capital Requirement

The LIM includes components and processes that are material to the risk and capital calculation within Lloyd's. It consists of three main component models:

- Capital Calculation Kernel (CCK);
- Lloyd's Catastrophe Model (LCM); and
- Lloyd's Investment Risk Model (LIRM).

The main element of the LIM is the Capital Calculation Kernel (CCK) which drives the capital calculation. It is a fully integrated Monte-Carlo simulation based stochastic model. The model is run with 100,000 simulations to ensure stability of results.

The CCK represents the entire Lloyd's marketplace and models all material quantifiable risk types that the market is exposed to. These risks are modelled using Monte-Carlo simulation methods and are drawn together using the structure of the Lloyd's market. This allows the impacts of these risks to be quantified for different entities in the market place, namely syndicates, members and Central Fund.

The CCK builds a specific representation of each syndicate from the ground up using a generic structure, within a framework of dependency which determines how much diversification there is within and between syndicates. The generic structure calculates stochastic technical provisions, P&L, and balance sheet for the end of the 12-month period 'on risk'. The CCK then models how risk flows through the "chain of security", i.e. from syndicates to members to the Central Fund.

Insurance risk is modelled separately for attritional risk and natural catastrophe risk. For attritional risks, insurance losses are simulated by class of business and allocated to insurance risk for each syndicate after allowing for syndicate level volatility (SLV). SLV is an additional simulated factor applied to allow for diversification between syndicates and the syndicates' class of business experience which will be more volatile compared to the market as a whole. As a result, syndicates will have different results and higher volatility than the market.

The catastrophe risk is defined by simulated losses imported from the LCM. SLV is not applied to natural catastrophe losses as the LCM captures syndicate variability and differences between syndicates directly. The LCM's core purpose is to take syndicate Exceedance Probability (EP) curves and produce an aggregated Lloyd's view of natural catastrophe risk. The LCM aggregates losses across scenarios and applies loadings to ensure complete coverage of risks (e.g. uplifts for European windstorm clustering, secondary uncertainty and non-modelled risks) to produce the aggregated Lloyd's market view. For each simulation in the CCK, a scenario is picked at random for each of the five major perils, plus Rest of the World ("RoW") risks.

The LIRM models market risks as part of the LIM and consists of three core subcomponents:

- Economic Scenario Generator (ESG) an external model provided by Willis Towers Watson, which produces consistent stochastic scenarios of economic and financial variables;
- Asset Model defines assets to be modelled, re-investment rules of the assets and calculates the distribution of total return for defined assets; and
- Portfolio Model defines asset portfolios by combining modelled assets.

Once all loss types are aggregated in the LIM, if syndicate losses exceed Premiums Trust Funds (PTF) then the excess is allocated to members. If member losses exceed their FAL then the excess becomes a loss to the Central Fund. Risks relating to the Central Fund which are not considered at syndicate level are also added (operational, market risk on central assets and pension risk). The Central Fund cover is then applied to produce a central capital requirement.

## Differences between standard formula and internal model

The LIM is a fully-integrated stochastic model. This method of calculating capital requirements is fundamentally different to the standard formula approach of deterministically combining stresses.

The LIM considers the unique nature and structure of the Lloyd's Market and the detailed risks to which it is exposed, which the standard formula is not able to do. This includes:

- Insurance Risk Profit in plan: The standard formula makes no allowance for any expected profits in business plans (which can be significant);
- Catastrophe Risk: Allowance for catastrophe risk uses a combination of shocks and scenarios in the standard formula which is significantly less sophisticated than the LIM (and syndicate internal models);
- Market risk: The LIM (and most syndicates) use Economic Scenario Generators (ESGs) to determine their market risk compared to the shocks applied to assets and own funds in the standard formula;
- Diversification: the standard formula gives credit for diversification within each syndicate only (across class, geographical area and risk component). The LIM models the diversification across the market both within and between syndicates which have different exposures; and
- Structure: The Standard Formula does not capture the unique capital structure of Lloyd's and cannot provide a Central Fund capital requirement.

## Risk measure and time-period used in the internal model

As set out in Article 101(3) of Directive 2009/138/EC, the SCR calculated using the internal model corresponds to the 99.5<sup>th</sup> Value-at-Risk over a one-year period.

## Nature and appropriateness of data used in the internal model

The LIM uses various sources of data; this data is both internal (based on analyses performed by Lloyd's) and external. Data used within the internal model is subject to the Lloyd's Data Quality Management Policy which requires checks and controls to be applied to the data. The purpose of this policy is to allow data owners to attest that it is accurate, appropriate and complete.

Data is subject to an annual internal audit of all controls and any associated risks arising from its use.

# E.5 Non-compliance with the Minimum Capital Requirement and non-compliance with the Solvency Capital Requirement\*

Lloyd's has met the Lloyd's SCR, central SCR and MCR throughout the reporting period.

# E.6 Any other information

There is no other material information to disclose.

# S.02.01.02

**Balance sheet** 

All figures shown in GBP '000

		Solvency II
		C0010
Assets		$\ge$
Goodwill	R0010	$\setminus$
Deferred acquisition costs	R0020	$\searrow$
Deferred tax assets	R0040	100,569
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	135,309
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	73,909,174
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	36,140
Equities	R0100	3,431,334
Equities - listed	R0110	3,251,725
Equities - unlisted	R0120	179,609
Bonds	R0130	57,688,508
Government Bonds	R0140	27,521,588
Corporate Bonds	R0150	24,963,765
Structured notes	R0160	5,891
Collateralised securities	R0170	5,197,264
Collective Investments Undertakings	R0180	11,274,395
Derivatives	R0190	42,343
Deposits other than cash equivalents	R0200	1,431,422
Other investments	R0210	5,032
Assets held for index-linked and unit-linked contracts	R0220	
Loans and mortgages	R0230	179,757
Loans on policies	R0240	
Loans and mortgages to individuals	R0250	145,756
Other loans and mortgages	R0260	34,001
Reinsurance recoverables from:	R0270	16,802,330
Non-life and health similar to non-life	R0280	16,484,715
Non-life excluding health	R0290	15,926,030
Health similar to non-life	R0300	558,685
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	317,615
Health similar to life	R0320	29,975
Life excluding health and index-linked and unit-linked	R0330	287,640
Life index-linked and unit-linked	R0340	207,010
Deposits to cedants	R0350	1,006,853
Insurance and intermediaries receivables	R0360	4,618,871
Reinsurance receivables	R0370	3,871,197
	R0370	1,122,275
Receivables (trade, not insurance)	R0380	1,122,273
Own shares (held directly) Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0390	· · · ·
Cash and cash equivalents	R0410	3,230,130
Any other assets, not elsewhere shown	R0420	380,267
Total assets	R0500	105,356,732

Liabilities		$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
Technical provisions – non-life	R0510	65,431,450
Technical provisions – non-life (excluding health)	R0520	62,970,504
Technical provisions calculated as a whole	R0530	
Best Estimate	R0540	59,071,192
Risk margin	R0550	3,899,313
Technical provisions - health (similar to non-life)	R0560	2,460,946
Technical provisions calculated as a whole	R0570	
Best Estimate	R0580	2,305,16
Risk margin	R0590	155,77
Technical provisions - life (excluding index-linked and unit-linked)	R0600	616,81
Technical provisions - health (similar to life)	R0610	44,97
Technical provisions calculated as a whole	R0620	
Best Estimate	R0630	43,15
Risk margin	R0640	1,81
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	571,84
Technical provisions calculated as a whole	R0660	
Best Estimate	R0670	524,64
Risk margin	R0680	47,19
Technical provisions – index-linked and unit-linked	R0690	
Technical provisions calculated as a whole	R0700	
Best Estimate	R0710	
Risk margin	R0720	
Other technical provisions	R0730	$\left  \right\rangle$
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	114,06
Pension benefit obligations	R0760	105,50
Deposits from reinsurers	R0770	1,703,84
Deferred tax liabilities	R0780	
Derivatives	R0790	64,42
Debts owed to credit institutions	R0800	590,28
Financial liabilities other than debts owed to credit institutions	R0810	138,50
Insurance & intermediaries payables	R0820	918,72
Reinsurance payables	R0830	3,020,05
Payables (trade, not insurance)	R0840	2,269,39
Subordinated liabilities	R0850	871,18
Subordinated liabilities not in Basic Own Funds	R0860	
Subordinated liabilities in Basic Own Funds	R0870	871,18
Any other liabilities, not elsewhere shown	R0880	1,042,80
Total liabilities	R0900	76,887,05
Excess of assets over liabilities	R1000	28,469,67

Classification: Confidential

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

# Gross Claims Paid (non-cumulative) - Current year, sum of years (cumulative). Total Non-Life Business

Non-Life (direct business/accepted proportional reinsurance and accepted non-proportional reinsurance) All figures shown in GBP '000

	Line of Business for: non-life insurance obligations (direct business and accepted proportional reinsurance) Line of Business for: accepted non-proportional reinsurance)									ed non-proportional reinsurance								
	м	fedical 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	Health	Casualty	Marine, aviation, transport	Property	Total
Premiums written																		
Gross - Direct Business	R0110	196,551	625,666	118,22	17 435,308	371,426	5 3,480,375	8,651,551	10,274,311	595,691	27,616	3,644	248,332					25,028,698
Gross - Proportional reinsurance accepted	R0120	51,932	210,517	48,20	19 282,714	50,382	2 1,377,044	2,595,973	1,979,060	438,067	3,457	1,238	71,694					7,110,287
Gross - Non-proportional reinsurance accepted	R0130													309,054	1,604,05	1 1,290,457	5,414,266	8,617,828
Reinsurers' share	R0140	42,061	145,313	45,78	168,029	64,517	7 1,085,635	2,932,243	3,609,558	309,607	6,505	-	73,896	47,969	559,26	1 395,306	2,006,750	11,492,435
Net	R0200	206,422	690,870	120,65	1 549,993	357,291	1 3,771,784	8,315,281	8,643,813	724,151	24,568	4,882	246,130	261,085	1,044,79	0 895,151	3,407,516	29,264,378
Premiums earned																		
Gross - Direct Business	R0210	194,101	610,223	124,849	19 427,613	386,949	3,280,879	8,396,170	9,177,601	545,097	48,236	6,158	202,952					23,400,828
Gross - Proportional reinsurance accepted	R0220	54,006	212,140	45,75	2 263,293	49,869	9 1,326,401	2,535,262	1,821,988	382,129	2,582	1,854	67,333					6,762,609
Gross - Non-proportional reinsurance accepted	R0230													301,418	1,491,93	7 1,253,154	5,267,130	8,313,639
Reinsurers' share	R0240	42,726	152,238	44,730	10 159,312	65,462	2 1,082,515	2,938,458	3,177,768	288,261	16,365	-	88,137	52,158	543,02	3 392,510	1,983,527	11,027,190
Net	R0300	205,381	670,125	125,87	1 531,594	371,356	5 3,524,765	7,992,974	7,821,821	638,965	34,453	8,012	182,148	year, sum of years (cumulative)	948,91	4 860,644	3,283,603	27,449,886
Claims incurred														Local Non-Life Business				
Gross - Direct Business	R0310	95,705	323,574	94,42	2 272,985	223,356	5 1,755,474	4,662,038	6,087,825	261,043	17,600	2,240	167,523					13,963,785
Gross - Proportional reinsurance accepted	R0320	26,448	115,683	50,56	8 228,720	28,421	1 632,233	1,822,431	1,694,575	193,120	55	441	87,558					4,880,253
Gross - Non-proportional reinsurance accepted	R0330													94,690	981,23	2 677,325	3,481,349	5,234,596
Reinsurers' share	R0340	30,600	94,274	52,81	.8 134,057	44,518	8 805,670	2,162,491	2,735,428	145,569	7,769	92	121,482	7,955	420,53	7 213,031	1,403,544	8,379,835
Net	R0400	91,553	344,983	92,17	2 367,648	207,259	9 1,582,037	4,321,978	5,046,972	308,594	9,886	2,589	133,599	86,735	560,69	5 464,294	2,077,805	15,698,799
Changes in other technical provisions																		
Gross - Direct Business	R0410	-	-	-	-	-	-	-	-	-	-	-	-					-
Gross - Proportional reinsurance accepted	R0420	-	-	-	-	-	-	-	-	-	-	-	-					-
Gross - Non- proportional reinsurance accepted	R0430													-	-	-	-	-
Reinsurers' share	R0440		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Net	R0500	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Expenses incurred	R0550	149,100	383,546	58,71	15 182,249	185,657	7 1,542,692	3,171,581	2,727,643	299,436	36,754	6,879	139,509	90,346	324,29	2 298,939	1,067,206	10,664,544
Other expenses	R1200																	55,056
Total expenses	R1300																	10,719,600

# <mark>S.05.01.02.02</mark> Z Axis: VG/Statutory accounts DI/Year to Date

Life All figures shown in GBP '000

				Line of Business for: lif	e insurance obligations			Life reinsurar	Life reinsurance obligations		
		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	Total	
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300	
Premiums written											
Gross	R1410	-	-	-	48,589	-	74,517	-	278	123,384	
Reinsurers' share	R1420	-	-	-	18,291	-	53,729	-	116	72,136	
Net	R1500	-	-	-	30,298		20,788	-	162	51,248	
Premiums earned											
Gross	R1510	-	-	-	48,459	-	74,517	-	170	123,146	
Reinsurers' share	R1520	-	-	-	18,508	-	53,729	-	141	72,378	
Net	R1600	-	-	-	29,951	-	20,788	-	29	50,768	
Claims incurred											
Gross	R1610	-	-	-	12,757	4,887	110,952	-	- 492	128,104	
Reinsurers' share	R1620	-	-	-	12,056	863	113,716	-	94	126,729	
Net	R1700	-	-	-	701	4,024	- 2,764	-	- 586	1,375	
Changes in other technical provisions											
Gross	R1710		-				-			-	

#### S.05.02.01.01

S.05.02.01.04

Home Country - life obligations

### Home Country - non-life obligations

All figures shown in GBP '000

		Home country - United Kingdom
		C0080
Premiums written		
Gross - Proportional reinsurance accepted	R0120	3,143,420
Gross - Non-proportional reinsurance accepted	R0130	2,127,124
Reinsurers' share	R0140	4,279,282
Net	R0200	11,103,527
Premiums earned		$\searrow$
Gross - Direct Business	R0210	9,412,772
Gross - Proportional reinsurance accepted	R0220	2,942,537
Gross - Non-proportional reinsurance accepted	R0230	2,130,120
Reinsurers' share	R0240	3,973,552
Net	R0300	10,511,877
Claims incurred		$\geq$
Gross - Direct Business	R0310	5,414,855
Gross - Proportional reinsurance accepted	R0320	2,447,548
Gross - Non-proportional reinsurance accepted	R0330	1,127,146
Reinsurers' share	R0340	2,980,279
Net	R0400	6,009,270
Changes in other technical provisions		$\searrow$
Gross - Direct Business	R0410	-
Gross - Proportional reinsurance accepted	R0420	-
Gross - Non-proportional reinsurance accepted	R0430	-
Reinsurers' share	R0440	-
Net	R0500	-
Expenses incurred	R0550	3,864,610
Other expenses	R1200	$\searrow$
Total expenses	R1300	$\sim$

USA	Belgium	Canada	Australia	Bermuda	Japan
C0090	C0091	C0092	C0093	C0094	C0094
662,178	46,504	54,525	1,699,622	338,890	97,469
3,433,997	145,653	198,371	109,267	508,679	218,644
3,859,322	422,467	272,971	409,135	272,181	106,030
9,185,040	1,329,260	861,430	1,583,004	674,740	292,177
8,436,837	1,451,589	812,732	164,523	113,225	69,406
695,647	43,820	53,006	1,555,915	325,299	99,723
3,304,418	146,651	186,257	101,092	445,179	213,993
3,828,586	411,808	256,260	346,625	282,574	105,456
8,608,316	1,230,252	795,735	1,474,905	601,129	277,666
5,546,794	722,979	408,881	62,343	58,317	36,575
486,352	39,938	22,278	1,014,737	253,038	34,565
2,293,743	47,526	125,064	100,520	380,996	104,446
3,051,675	203,433	141,516	282,893	339,525	76,802
5,275,214	607,010	414,707	894,707	352,826	98,784
>			>		
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-		-
3,387,895	499,772	286,320	460,108	101,806	75,634
5,507,695	439,772	200,320	400,108	101,800	73,034
		$\sim$			

### S.05.02.01.05

S.05.02.01.02

### Top 5 countries (by amount of gross premiums written) - life obligations

Top 6 countries (by amount of gross premiums written) - non-life obligations

All figures shown in GBP '000		
		Home country - United Kingdom
		C0220
Premiums written		
Gross	R1410	123,284
Reinsurers' share	R1420	68,186
Net	R1500	55,098
Premiums earned		$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
Gross	R1510	122,939
Reinsurers' share	R1520	68,361
Net	R1600	54,578
Claims incurred		$>\!\!\!\!\!\!\!\!\!\!\!\!\!$
Gross	R1610	125,068
Reinsurers' share	R1620	123,150
Net	R1700	1,918
Changes in other technical provisions		$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
Gross	R1710	
Reinsurers' share	R1720	
Net	R1800	
Expenses incurred	R1900	17,975
Other expenses	R2500	$>\!\!\!>\!\!\!>$
Total expenses	R2600	$>\!\!\!\!\!\!\!\!\!\!\!\!\!$

USA	Norway	Italy	Mexico	Switzerland
C0230	C0231	C0232	C0233	C0234
		>	>	
83	1	-	-	(35)
62	399	2	-	626
21	(398)	(2)	-	(661)
$>\!\!\!\!\!\!\!\!\!\!$	>	>	$>\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!$
137	(2)	-	-	(35)
96	399	2	-	626
41	(401)	(2)	-	(661)
$\geq$	$\sim$	$\langle$	$\sim$	$\geq$
3,629	109	4	-	(187)
183	535	2	-	662
3,446	(426)	2	-	(849)
$\sim$	$\sim$	$\sim$	$\geq$	$\sim$
· ·	· ·	<u> </u>	<u> </u>	· ·
-	-	-	-	-
-	-	-	-	-
208	18	33	-	29
200				
	$\sim$	$\sim$	$\sim$	>

S.05.02.01.03

#### Total Top 6 and home country - non-life obligations

Total Top 6 and home country
C0140
6,042,608
6,741,735
9,621,388
25,029,178
20,461,084
5,715,947
6,527,710
9,204,861
23,499,880
12,250,744
4,298,456
4,179,441
7,076,123
13,652,518
>
-
-
-
-
-
8,676,145
8,676,145

S.05.02.01.06

# Total Top 5 and home country

Total Top 5 and hom
C0280

# - life obligations

Total Top 5 and home country							
C0280							
123,333							
69,275							
54,058							
123,039							
69,484							
53,555							
128,623							
124,532							
4,091							
-							
-							
-							
18,263							
(2)							
18,261							

\$.12.01.02 - £000

#### S.12.01.02 Life and Health SLT Technical Provisions All figures shown in GBP '000

													Gross Claims Paid (non-cumulative) - Current year, sum of years (cumulative).					
	_													Total Non-Life Business				
		Insurance with profit	Ind	ex-linked and unit-linked insu	irance		Other life insurance		Annuities stemming from		Total (Life other than	1	Health insurance (direct busine	ess)	Annuities stemming from	Health reinsurance	Total (Health similar to life	
		participation		Contracts without options	Contracts with options or	1	Contracts without options	Contracts with options or	non-life insurance	Accepted reinsurance	health insurance, incl. Unit-		Contracts without options	Contracts with options or	non-life insurance	(reinsurance accepted)	insurance)	
				and guarantees	guarantees		and guarantees	guarantees	contracts and relating to		Linked)		and guarantees	guarantees	contracts and relating to	(reinsurance accepted)		
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210	
Technical provisions calculated as a whole F	R0010																1 A A A A A A A A A A A A A A A A A A A	
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  s	R0020			$\succ$	$\geq$		$\geq$	$\succ$	-				$\geq$	$\succ$				
Best Estimate		>	$>\!\!<$	$>\!\!<$	$>\!\!<$	>	$>\!\!<$	> <	$\sim$	>		$>\!\!<$		$>\!\!<$	$>\!\!<$	$>\!\!<$		
Gross Best Estimate F	R0030		$>\!\!<$				31.260		411.234	82.150	524.644	$>\!\!<$			43.155	-	43.155	
Total Recoverables from reinsurance/SPV and Finite Re after the			$\sim$			$\sim$	1.397		286.377		287.641	$\sim$			29.975		29.975	
adjustment for expected losses due to counterparty default F	R0080		$\sim$			$\sim$	1,397		286,377	(133)	287,641	$\sim$		-	29,975	-	29,975	
Best estimate minus recoverables from reinsurance/SPV and Finite Re - p	R0090		>			$\geq$	29.863		124.857	82.283	237.003	>			13.180		13.180	
Risk Margin F	R0100					2.764			36.415	8.018	47.197				1.819		1.819	
Amount of the transitional on Technical Provisions		$\sim$	$\sim$			$\geq$				$\sim$		$\sim$						
	R0110				$\geq$		$\geq$	$\geq$							100 C			
	R0120		>									>						
	R0130			>	>		>	>						$\sim$			1. A	
Technical provisions - total p	R0200			$\sim$	$\sim$	34.024	$\geq$	$\sim$	447.649	90.168	571.841			$\sim$	44.974		44.974	

# S.17.01.02 Non-Life Technical Provisions All figures shown in GBP '000

	_	Gross Claims Paid (non-cumulative) - Current year, sum of years (cumulative).																
							Direct business and accept	ed proportional reinsurance					1	Total Non-Life Business				
	Me	dical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport	Non-proportional property reinsurance	Total Non-Life obligation
	-	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	reinsurance C0160	C0170	C0180
Technical provisions calculated as a whole	R0010	-		-	-	-	-	-	-	-	-		-	-	-	-	-	-
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Technical provisions calculated as a sum of BE and RM		$>\!\!\!<\!\!\!<$	$>\!\!\!>$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	>>	$>\!\!\!\!>$	$>\!\!\!>$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!>$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!>$	$>\!\!\!\!>$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
Premium provisions		$>\!\!<\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$>\!\!<$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$\geq$	$\geq$	$>\!\!<$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!$
Gross	R0060	3,781	2,150	10,311	56,534	50,437	(28,308)	701,597	1,003,413	58,838	2,199	1,016	(5,869)	(30,470)	38,416	(25,941)	(310,754)	1,527,350
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty																		
default	R0140	(3,835)	(25,905)	(4,597)	(10,811)	4,184	(297,098)	(691,325)	(259,067)	(63,532)	(701)	60	(21,552)	(15,485)	(15,519)	(141,011)	(584,162)	(2,130,356)
Net Best Estimate of Premium Provisions	R0150	7,616	28,055	14,908	67,345	46,253	268,790	1,392,922	1,262,480	122,370	2,900	956	15,683	(14,985)	53,935	115,070	273,408	3,657,706
Claims provisions		$>\!\!\!<\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$\geq$	$\geq$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
Gross	R0160	122,800	773,845	629,759	1,096,281	272,920	5,707,336	9,563,680	24,448,610	1,037,599	46,453	72	1,480,472	792,992	4,977,360	2,426,618	6,472,212	59,849,009
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty																		
default	R0240	4,577	128,699	163,898	410,154	44,939	1,442,448	3,079,250	7,366,763	303,416	11,203	11	466,034	311,333	1,500,506	894,543	2,487,296	18,615,070
Net Best Estimate of Claims Provisions	R0250	118,223	645,146	465,861	686,127	227,981	4,264,888	6,484,430	17,081,847	734,183	35,250	61	1,014,438	481,659	3,476,854	1,532,075	3,984,916	41,233,939
Total Best estimate - gross	R0260	126,581	775,995	640,070	1,152,815	323,357	5,679,028	10,265,277	25,452,023	1,096,437	48,652	1,088	1,474,603	762,522	5,015,776	2,400,677	6,161,458	61,376,359
Total Best estimate - net	R0270	125,839	673,201	480,769	753,472	274,234	4,533,678	7,877,352	18,344,327	856,553	38,150	1,017	1,030,121	466,674	3,530,789	1,647,145	4,258,324	44,891,645
Risk margin	R0280	11,394	50,127	48,246	99,002	31,032	393,353	621,572	1,601,915	99,184	3,572	114	80,259	46,012	378,030	143,997	447,282	4,055,091
Amount of the transitional on Technical Provisions		$>\!\!\!\!>\!\!\!\!>$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	>>	>>	>>	>>	>>	Gr	oss discounted Be	st Estimate Claims	Provisions - Curr	ent year, sum of y	(ears (cumulative)	>>	>>	>>	>>
Technical Provisions calculated as a whole	R0290	-		-	-	-	-	-	-	-	-		-	Total Non-Life Business		-	-	-
Best estimate	R0300	-		-	-	-	-	-	-	-	-		-	-	-	-	-	-
Risk margin	R0310	-		-	-	-	-	-	-	-	-		-	-	-	-	-	-
Technical provisions - total		$>\!\!\!<\!\!\!\sim$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
Technical provisions - total	R0320	137,975	826,122	688,316	1,251,817	354,389	6,072,381	10,886,849	27,053,938	1,195,621	52,224	1,202	1,554,862	808,534	5,393,806	2,544,674	6,608,740	65,431,450
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty																		
default - total	R0330	742	102,794	,	399,343	49,123	1,145,350	2,387,925	7,107,696	,	,	71	444,482	/		753,532	1,903,134	16,484,714
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	137,233	723,328	529,015	852,474	305,266	4,927,031	8,498,924	19,946,242	955,737	41,722	1,131	1,110,380	512,686	3,908,819	1,791,142	4,705,606	48,946,736

All figures shown in GBP '000

#### S.19.01.21.01

Gross Claims Paid (non-cumulative) - Development year (absolute amount)

	]	0	1	2	3	4	5	6	7	8	9	10 & +
	·	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110
Prior	R0100	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\searrow$	593,547
N-9	R0160	1,950,163	3,961,969	3,212,974	1,835,504	1,108,207	693,469	543,520	392,473	215,957	105,187	$\searrow$
N-7	R0180	1,456,025	3,734,779	2,950,291	1,433,423	878,988	715,562	469,970	340,693	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
N-6	R0190	1,017,621	3,747,941	2,935,794	1,945,705	1,135,677	1,259,138	612,553	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$\searrow$	>
N-5	R0200	844,482	3,972,466	3,313,911	1,827,971	1,333,253	1,004,670	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!$	>	>
N-4	R0210	1,233,759	5,027,157	4,476,804	2,474,181	1,704,778	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$\geq$	$\geq$	>	>
N-3	R0220	2,746,495	8,041,634	5,535,652	3,216,124	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$\geq$	$\searrow$	$\searrow$
N-2	R0230	1,932,354	7,953,236	4,876,745	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	>	$\geq$	$\geq$	$\geq$	$\geq$	$\searrow$	$\searrow$
N-1	R0240	1,282,302	5,547,924	$>\!\!\!\!\!\!\!\!\!\!\!\!\!$	>	$\geq$	>	> <	$\geq$	$\geq$	>	>
N	R0250	1,787,348	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!>$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	>	>

#### S.19.01.21.03

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

		0	1	2	3	4	5	6	7	8	9	10 & +
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0350
Prior	R0100	$\geq$	$\geq$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\searrow$	$\searrow$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\searrow$	$\searrow$	4,081,943
N-9	R0160	0	0	0	153,809	132,556	1,725,407	1,512,417	1,303,174	1,071,594	944,397	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
N-8	R0170	0	0	240,864	222,783	3,038,655	2,235,247	1,828,395	1,421,051	1,190,269	$\searrow$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!$
N-7	R0180	0	338,702	299,799	3,778,195	3,065,206	2,380,386	1,799,927	1,419,646	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
N-6	R0190	247,386	516,123	6,262,313	4,313,132	4,171,562	2,674,037	2,098,401	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$\geq$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
N-5	R0200	339,883	8,341,359	6,565,516	5,497,918	4,250,847	3,460,709	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!$
N-4	R0210	5,561,745	10,945,738	8,384,318	6,460,869	5,121,452	>>	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
N-3	R0220	10,925,582	14,066,572	10,819,120	8,067,472	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
N-2	R0230	9,063,950	13,131,141	11,341,595	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	>>	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	>>	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
N-1	R0240	6,607,118	14,379,380	$>\!\!\!\!>\!\!\!\!>$	$>\!\!\!\!>\!\!\!\!>$	$>\!\!\!\!>\!\!\!\!>$	$>\!\!\!>$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!>$	>>	>>	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
Ν	R0250	7,605,108	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	>>	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$

### S.19.01.21.02

Gross Claims Paid (non-cumulative) - Current year, sum of years (cumulative). Total Non-Life Business

		In Current year	Sum of years
		in current year	(cumulative)
		C0170	C0180
Prior	R0100	593,547	593,547
N-9	R0160	105,187	14,019,423
N-7	R0180	340,693	11,979,731
N-6	R0190	612,553	12,654,429
N-5	R0200	1,004,670	12,296,753
N-4	R0210	1,704,778	14,916,679
N-3	R0220	3,216,124	19,539,905
N-2	R0230	4,876,745	14,762,335
N-1	R0240	5,547,924	6,830,226
N	R0250	1,787,348	1,787,348
Total	R0260	20,008,703	121,754,981

#### S.19.01.21.04

Gross discounted Best Estimate Claims Provisions - Current year, sum of years (cumulative). Total Non-Life Business

		Year end (discounted
		data)
		C0360
Prior	R0100	3,967,530
N-9	R0160	929,132
N-8	R0170	1,175,816
N-7	R0180	1,402,241
N-6	R0190	2,077,219
N-5	R0200	3,430,191
N-4	R0210	5,082,686
N-3	R0220	8,012,750
N-2	R0230	11,269,895
N-1	R0240	14,295,090
N	R0250	7,541,371
Total	R0260	59,183,921

# S.23.01.01

Own funds All figures shown in GBP '000

### S.23.01.01.01

Own funds

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35		>	>	> <		>
Share premium account related to ordinary share capital	R0030	-	-	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$	-	$>\!\!\!>\!\!\!>$
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	28,287,428	28,287,428	>	-	$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
Subordinated mutual member accounts	R0050	-	$>\!\!\!<$	-		
Surplus funds	R0070	-		$>\!\!\!\!\!\!\!\!\!\!\!\!\!$	$\geq$	$>\!\!\!>\!\!\!>$
Preference shares	R0090	-	>			
Share premium account related to preference shares	R0110	-	$\sim$	-		
Reconciliation reserve	R0130	(846,441)	(846,441)	>		$>\!\!<$
Subordinated liabilities	R0140	871,181			. 871,181	
An amount equal to the value of net deferred tax assets	R0160	100.569	<u> </u>	$\sim$	$\sim$	100.5
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	-				/-
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds			>	>		$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!\!$
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220	-		$\geq$		$\geq$
Deductions		>	>>	>	>>	>>
Deductions for participations in financial and credit institutions	R0230	-	-	-		
Total basic own funds after deductions	R0290	28,412,737	27,440,987	-	871,181	100,5
Ancillary own funds		>	>>	$>\!\!\!\!>\!\!\!\!>$	$\geq$	>>
Unpaid and uncalled ordinary share capital callable on demand	R0300	-	$>\!\!<$	>	-	>>
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	-	>	>>	-	>>
Unpaid and uncalled preference shares callable on demand	R0320	-	$>\!\!<$	$>\!\!<$	-	
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	-	>>	>>	-	
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	6,769,897	$\sim$	$\sim$	6,769,897	$>\!\!\!\!\!\!\!\!\!\!\!\!\!$
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	-	$\sim$	$\sim$		
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC						$\sim$
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	-			-	
	R0360 R0370	-		$\leq$		
Other ancillary own funds		- - 19,238				
Other ancillary own funds Total ancillary own funds	R0370	- - 19,238 6,789,135			- - 19,238 6,789,135	
	R0370 R0390	,			· · · · · · · · · · · · · · · · · · ·	
Total ancillary own funds	R0370 R0390	6,789,135	27,440,987		6,789,135	100.5
Total ancillary own funds Available and eligible own funds	R0370 R0390 R0400	6,789,135	, ,		· · · · · · · · · · · · · · · · · · ·	100,5
Total ancillary own funds         Available and eligible own funds         Total available own funds to meet the SCR	R0370 R0390 R0400 R0500	6,789,135 35,201,872 28,312,168	27,440,987		6,789,135 7,660,316 871,181	
Total ancillary own funds         Available and eligible own funds         Total available own funds to meet the SCR         Total available own funds to meet the MCR	R0370 R0390 R0400 R0500 R0510	6,789,135 35,201,872 28,312,168 35,201,872	27,440,987 27,440,987		6,789,135 7,660,316 871,181 7,660,316	
Total ancillary own funds         Available and eligible own funds         Total available own funds to meet the SCR         Total eligible own funds to meet the MCR	R0370 R0390 R0400 R0500 R0510 R0540	6,789,135 35,201,872 28,312,168 35,201,872 28,312,168	27,440,987		6,789,135 7,660,316 871,181	
Total ancillary own funds       Image: Comparison of Compari	R0370 R0390 R0400 R0500 R0510 R0540 R0550 R0580	6,789,135 35,201,872 28,312,168 35,201,872 28,312,168 19,900,000	27,440,987 27,440,987		6,789,135 7,660,316 871,181 7,660,316	
Total ancillary own funds         Available and eligible own funds         Total available own funds to meet the SCR         Total available own funds to meet the MCR         Total eligible own funds to meet the SCR	R0370 R0390 R0400 R0500 R0510 R0540 R0550	6,789,135 35,201,872 28,312,168 35,201,872 28,312,168	27,440,987 27,440,987		6,789,135 7,660,316 871,181 7,660,316	100,56

#### S.23.01.01.02

#### **Reconciliation reserve**

		C0060
Reconciliation reserve		$>\!\!\!>\!\!\!<$
Excess of assets over liabilities	R0700	28,469,677
Own shares (held directly and indirectly)	R0710	-
Foreseeable dividends, distributions and charges	R0720	435,121
Other basic own fund items	R0730	28,387,997
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	493,000
Reconciliation reserve	R0760	(846,441)
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	7,295
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	5,097,986
Total Expected profits included in future premiums (EPIFP)	R0790	5,105,281

#### S.25.03.21

#### Solvency Capital Requirement - for undertakings on Full Internal Models All figures shown in GBP '000

#### S.25.03.01.01

#### Component-specific information

Unique number of component	Components Description	Calculation of the Solvency Capital Requirement
C0010	C0020	C0030
103001	Other interest rate risk	848,417
107001	Spread risk	3,130,928
109001	Currency risk	9,954,338
110001	Other market risk	5,416,569
199001	Diversification within market risk	-15,600,255
201001	Type 1 counterparty risk (reinsurance credit risk)	1,203,091
203101	Other counterparty risk (asset default on cash and LoCs only)	0
299001	Diversification within counterparty risk	154,385
300001	Total life underwriting risk (sum of syndicate's life SCRs)	0
408001	Health NSLT medical expenses	92,277
409001	Health NSLT income protection	397,572
410001	Health NSLT worker's compensation	203,312
41100	Health NSLT non-proportional reinsurance	391,931
499001	Diversification within health underwriting risk	-211,749
501501	Premium risk	8,085,862
502101	Reserve risk	12,270,910
503001	Non-life catastrophe risk : natural (i.e. meteorological and geological)	7,122,619
599001	Diversification within non-life underwriting risk	-10,933,498
701001	Operational risk	746,445
801001	Other risks including pension risk, ACF, FX adjustment, CFI and bottom-line	
	adjustment to Q4 2021 interest rates	884,266

### S.25.03.01.02

### Calculation of Solvency Capital Requirement

		C0100
Total undiversified components	R0110	30,405,212
Diversification	R0060	-10,505,212
Capital requirement for business operated in accordance with Art. 4 of Directive		
2003/41/EC (transitional)	R0160	
Solvency capital requirement excluding capital add-on	R0200	19,900,000
Capital add-ons already set	R0210	
Solvency capital requirement	R0220	19,900,000
Other information on SCR		
Amount/estimate of the overall loss-absorbing capacity of technical provisions	R0300	
Amount/estimate of the overall loss-absorbing capacity ot deferred taxes	R0310	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	19,900,000
Total amount of Notional Solvency Capital Requirement for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment		
portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

5.28.02.01 Minimum Capital Requirement - Both life and non-life insurance activity All figures shown in GBP '000 5.28.02.01.01

MCR components

		MCR components		
		Non-life activities	Life activities	
		MCR <sub>(NL, NL)</sub> Result	MCR <sub>(NL, L)</sub> Result	
		C0010	C0020	
Linear formula component for non-life insurance and reinsurance obligations	B0010	9.066.318		

<mark>S.28.02.01.02</mark> Z Axis: VG/Solvency II

Background information

		Background information			
		Non-life activities		Life activities	
		Net (of reinsurance/ SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months		Net (of reinsurance) written premiums in the last 12 months
		C0030	C0040	C0050	C0060
Medical expense insurance and proportional reinsurance	R0020	130,837	223,140		
Income protection insurance and proportional reinsurance	R0030	684,012	674,992		
Workers' compensation insurance and proportional reinsurance	R0040	480,938	156,827		
Motor vehicle liability insurance and proportional reinsurance	R0050	757,751	587,293		
Other motor insurance and proportional reinsurance	R0060	275,325	355,208		
Marine, aviation and transport insurance and proportional reinsurance	R0070	4,552,484	3,767,747		
Fire and other damage to property insurance and proportional reinsurance	R0080	7,933,605	8,546,372		
General liability insurance and proportional reinsurance	R0090	18,380,853	8,836,342		
Credit and suretyship insurance and proportional reinsurance	R0100	889,707	699,385		
Legal expenses insurance and proportional reinsurance	R0110	38,183	41,743		
Assistance and proportional reinsurance	R0120	1,018	4,758		
Miscellaneous financial loss insurance and proportional reinsurance	R0130	1,030,327	199,070		
Non-proportional health reinsurance	R0140	467,925	296,028		
Non-proportional casualty reinsurance	R0150	3,537,022	1,206,978		
Non-proportional marine, aviation and transport reinsurance	R0160	1,647,905	900,457		
Non-proportional property reinsurance	R0170	4,277,713	3,454,865		

#### S.28.02.01.03

Linear formula component for life insurance and reinsurance obligations

	Non-life activities	Life activities	
	MCR(L, NL) Result	MCR(L, L) Result	
	C0070	C0080	
R0200		14,169	VG/Solvency II

Linear formula component for life insurance and reinsurance obligations RC LE/Non-life activity LE/Life activity

S.28.02.01.04 Z Axis: VG/Solvency II

Total capital at risk for all life (re)insurance obligations

		Non-life activities		Life activities	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0090	C0100	C0110	C0120
Obligations with profit participation - guaranteed benefits	R0210		X		
Obligations with profit participation - future discretionary benefits	R0220		$>\!\!\!\!\!\!\!\!\!\!\!\!\!\!$		
Index-linked and unit-linked insurance obligations	R0230		$\sim$		
Other life (re)insurance and health (re)insurance obligations	R0240		X	250,791	
Total capital at risk for all life (re)insurance obligations	R0250				12,717,297

# S.28.02.01.05 Z Axis: VG/Solvency II

Overall MCR calculation

		C0130
Linear MCR	R0300	9,080,487
SCR	R0310	19,900,000
MCR cap	R0320	8,955,000
MCR floor	R0330	4,975,000
Combined MCR	R0340	8,955,000
Absolute floor of the MCR	R0350	3,126
Minimum Capital Requirement	R0400	8,955,000

# S.28.02.01.06 Z Axis: VG/Solvency II

#### Notional non-life and life MCR calculation

		Non-life activities	Life activities
		C0140	C0150
Notional linear MCR	R0500	9,066,318	14,169
Notional SCR excluding add-on (annual or latest calculation)	R0510	-	
Notional MCR cap	R0520	9,066,318	14,169
Notional MCR floor	R0530		-
Notional Combined MCR	R0540	9,066,318	14,169
Absolute floor of the notional MCR	R0550		-
Notional MCR	R0560	9,066,318	14,169



Independent Reasonable Assurance Report of PricewaterhouseCoopers LLP to the Council of Lloyd's on the preparation of Relevant elements of the Solvency Financial Condition Report under Pillar 3 of Solvency II for the association of underwriters known as Lloyd's as at 31 December 2021

# Opinion

In our opinion, the Council of Lloyd's has prepared the information subject to assurance in the Relevant elements of the Solvency Financial Condition Report (as defined below) under Pillar 3 of Solvency II for the association of underwriters known as Lloyd's ('Lloyd's') as at 31 December 2021, in all material respects in accordance with the reporting basis of preparation (the 'Lloyd's basis of preparation').

This opinion should be read in the context of what we say in the remainder of this report.

# What we have assured

Except as noted in Appendix A, we have assured the 'Relevant elements of the Solvency and Financial Condition Report', which is prepared by the Council of Lloyd's and comprises:

- The 'Valuation for Solvency Purposes' and 'Capital Management' sections of the Solvency and Financial Condition Report of Lloyd's as at 31 December 2021 ('the Narrative Disclosures subject to reasonable assurance'), which include both Market Wide and Central Solvency disclosures; and
- Lloyd's templates S.02.01.02, S.12.01.02, S.17.01.02, S.23.01.01 and S.28.02.01 ('the Templates subject to reasonable assurance'), which include Market Wide Solvency disclosures only.

The Relevant elements of the Solvency and Financial Condition Report specific to the Market Wide Solvency disclosures have been compiled by aggregating:

- i. financial information extracted from the corresponding Solvency II information included in syndicates' Annual Solvency Returns by the managing agent of each syndicate, which have been submitted to the Council of Lloyd's and on which the auditors of each syndicate have reported;
- ii. Society of Lloyd's financial information extracted from the Society of Lloyd's IFRS financial statements and adjusted for presentation and classification differences between IFRS and Solvency II, in line with the Lloyd's basis of preparation; and

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iii. Funds at Lloyd's financial information extracted from the Lloyd's Pro Forma Financial Statements and adjusted for presentation and classification differences between the basis of preparation of the PFFS and Solvency II, in line with the Lloyd's basis of preparation.

Our work in respect of the Annual Solvency Returns did not involve assessing the quality of the syndicate audits or performing any audit procedures over the financial or other information of the syndicates or provided by the managing agents of the syndicates.

# Professional standards applied and level of assurance

We performed a reasonable assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised) – 'Assurance Engagements other than Audits or Reviews of Historical Financial Information' ("ISAE 3000 (Revised)"), issued by the International Auditing and Assurance Standards Board (IAASB).

Our examination in respect of the Central Solvency disclosures has consisted principally of:

- obtaining an understanding of the process used by the Council of Lloyd's to compile the Relevant elements of the Solvency and Financial Condition Report from the financial records of the Society of Lloyd's; and
- checking (on a sample basis) that the financial information included in the Relevant elements of the Solvency and Financial Condition Report for the Society of Lloyd's was correctly extracted from the Society of Lloyd's IFRS financial statements, and that adjustments were made by Lloyd's for presentation and classification differences between IFRS and Solvency II, in line with the Lloyd's basis of preparation.

Our examination in respect of the Market Wide Solvency disclosures has consisted principally of:

- obtaining an understanding of the process used by the Council of Lloyd's to compile the Relevant elements of the Solvency and Financial Condition Report from the financial records of the Society of Lloyd's, relating to Funds at Lloyd's and from the audited syndicate Annual Solvency Returns, prepared by the managing agent of each syndicate;
- checking (on a sample basis) that the financial information included in the Relevant elements of the Solvency and Financial Condition Report for syndicates was correctly extracted from the audited syndicate Annual Solvency Return;
- checking (on a sample basis) that the financial information included in the Relevant elements of the Solvency and Financial Condition Report for the Society of Lloyd's was correctly extracted from the Society of Lloyd's IFRS financial statements, and



that adjustments were made by Lloyd's for presentation and classification differences between IFRS and Solvency II, in line with the Lloyd's basis of preparation;

- checking (on a sample basis) that the financial information included in the Relevant elements of the Solvency and Financial Condition Report relating to Funds at Lloyd's was correctly extracted from the Lloyd's Pro Forma Financial Statements (the 'PFFS'), and that adjustments were made by Lloyd's for presentation and classification differences between the basis of preparation of the PFFS and Solvency II, in line with the Lloyd's basis of preparation; and
- evaluating evidence (on a sample basis) to support the completeness and accuracy of management's reconciliation of the Ancillary Own Funds in the Relevant elements of the Solvency and Financial Condition Report to the amounts approved by the PRA in its letter to Lloyd's dated 15 December 2021.

# **Other Information**

We are not required to assure, and as a consequence, do not express an opinion on the 'Other Information' which comprises:

- Information contained within the Relevant elements of the Solvency and Financial Condition Report relating to, or derived from, the Market Wide Solvency Capital Requirement and Central Solvency Capital Requirement, as identified in Appendix A to this report;
- The 'Summary', 'Business and performance', 'System of governance' and 'Risk profile' elements of the Solvency and Financial Condition Report;
- Lloyd's templates S.05.01.02, S.05.02.01, S.19.01.21 and S.25.03.21; and
- The written acknowledgement by management of their responsibilities, including for the preparation of the Solvency and Financial Condition Report (the 'Governing body's statement in respect of the SFCR', the Responsibility Statement).

To the extent the information subject to assurance in the Relevant elements of the Solvency and Financial Condition Report includes amounts that are totals, sub-totals or calculations derived from the Other Information, we have relied without verification on the Other Information.



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

Our assurance procedures do not extend to information in respect of earlier periods or to any other information included in the Lloyd's Solvency and Financial Condition Report within which the Relevant elements of the Solvency and Financial Condition Report as at 31 December 2021 are included.

In accordance with Rule 4.1 (3) of the External Audit Part of the PRA Rulebook for Solvency II firms, we are required to read the Other Information (as defined above) and consider whether it is materially inconsistent with the Relevant elements of the Solvency and Financial Condition Report and our knowledge obtained in:

- the reasonable assurance engagements over the Lloyd's 2021 Solvency and Financial Condition Report and the Lloyd's 2021 Pro Forma Financial Statements (Market Wide Solvency disclosures); and
- the reasonable assurance engagement over the Lloyd's 2021 Solvency and Financial Condition Report and the 2021 audit of the Society of Lloyd's Financial Statements (Central Solvency disclosures).

If, based on the work we have performed, we conclude that there is a material misstatement of this Other Information, we are required to report that fact. We have nothing to report in this regard.

# **Our Independence and Quality Control**

In carrying out our work, we complied with the Institute of Chartered Accountants in England and Wales (ICAEW) Code of Ethics, which includes independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour, that are at least as demanding as the applicable provisions of the IESBA Code of Ethics. We also apply International Standard on Quality Control (UK) 1 and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.



# The responsibilities of the Council of Lloyd's and Our responsibilities

The purpose of the Solvency and Financial Condition Report is to allow the Council of Lloyd's to report the solvency position of the association of underwriters known as Lloyd's in accordance with the requirements of Solvency II.

The Council of Lloyd's is responsible for the preparation of the Solvency and Financial Condition Report, including its basis of preparation, in accordance with the financial reporting provisions of the PRA rules and Solvency II regulations which have been modified by the modifications, and supplemented by the approvals and determinations made by the PRA under section 138A of FSMA, the PRA Rules and Solvency II regulations on which they are based, as detailed below:

- Approval of items of ancillary own funds (Market Wide Solvency disclosures only);
- Approval to classify syndicate loans to the Central Fund as restricted Tier 1 capital (Central Solvency disclosures only);
- Approval to use a full internal model (Market Wide and Central Solvency disclosures); and
- Modification of External Audit rule 4.1 for Lloyd's to obtain a reasonable assurance opinion in accordance with ISAE 3000 (Revised) (Market Wide and Central Solvency disclosures).

The Council of Lloyd's is also responsible for designing and implementing an appropriate basis of preparation for this purpose and for such internal control as they determine is necessary to enable the preparation of a Solvency and Financial Condition Report that is free from material misstatement, whether due to fraud or error.

Our responsibility is to express an opinion about whether the preparation of the Relevant elements of the Solvency and Financial Condition Report has been performed by the Council of Lloyd's on the basis set out in Lloyd's basis of preparation.



# Intended users and purpose

This report including our opinion has been prepared solely for the Council of Lloyd's in accordance with our engagement letter dated 17 December 2021 to assist the Council of Lloyd's to comply with its obligations under External Audit rule 2.1 of the Solvency II firms Sector of the PRA Rulebook and for no other purpose. We do not, in providing this report, accept or assume responsibility for any other purpose or to any other party save where expressly agreed by our prior consent in writing.

Price weter house Coopers LLP

PricewaterhouseCoopers LLP Chartered Accountants London 8 April 2022



# Appendix A – Relevant elements of the Solvency and Financial Condition Report that are not subject to reasonable assurance

The Relevant elements of the Solvency and Financial Condition Report that are not subject to reasonable assurance comprise:

- The following elements of template S.02.01.02:
  - Row R0550: Technical provisions non-life (excluding health) risk margin
  - Row R0590: Technical provisions health (similar to non-life) risk margin
  - Row R0640: Technical provisions health (similar to life) risk margin
  - Row R0680: Technical provisions life (excluding health and index-linked and unitlinked) - risk margin
  - Row R0720: Technical provisions Index-linked and unit-linked risk margin
- The following elements of template S.12.01.02:
  - Row R0100: Technical provisions calculated as a sum of BE and RM Risk margin
  - Rows R0110 to R0130 Amount of the transitional on Technical Provisions
- The following elements of template S.17.01.02:
  - Row R0280: Technical provisions calculated as a sum of BE and RM Risk margin
  - Rows R0290 to R0310 Amount of the transitional on Technical Provisions
- The following elements of template S.23.01.01:
  - Row R0580: SCR
  - Row R0740: Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds
- The following elements of Company template S.28.02.01:
  Row R0310: SCR
- Elements identified as 'not subject to reasonable assurance'.