



**AIG Holdings Europe Limited**

2018 Group Solvency and Financial Condition Report

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# Executive summary

AIG Holdings Europe Limited is the AIG European Group as of 30<sup>th</sup> November 2018.

During 2018 the European Group restructured its operations across Europe to ensure resilience to the outcome of the negotiations regarding the UK's departure from the European Union.

AIG began planning for Brexit in 2015, prior to the UK referendum, and in 2018 finalised plans for its future structure to ensure continuity of business and contract certainty. AIG was the first insurer to outline their plans with clarity and continued to work at pace to restructure the company and give customers, partners and colleagues certainty that AIG will be open for business regardless of the UK's future relationship with the European Union.

Back in March 2017, AIG announced its decisive move to locate a new European insurance company in Luxembourg. Since then two new insurance companies have been created, AIG Europe S.A. (AESAs) which operates out of 19 countries with the ability to cover the entire EEA, and a new UK insurance company, American International Group UK Limited (AIG UK). The two-entity structure allows AIG to meet the needs of its clients and guarantees contract certainty for AEL policyholders after the UK leaves the European Union.

The restructure was undertaken through a legal process combining an insurance business transfer of insurance business from AIG Europe Limited (AEL) to AIG UK and AESAs, and a cross border merger of AEL into AESAs, and was approved by the High Court of England and Wales on 25<sup>th</sup> October 2018.

The transfers took effect on 1<sup>st</sup> December 2018, which means that AEL was dissolved as a legal entity on that date.

As of today, AIG is now operating effectively from both the UK and Luxembourg and the successful implementation has ensured a seamless and efficient transition for customers and partners throughout Europe.

Although there are new trading names, AIG has a history of over 60 years in the UK, 70 years in many countries in Europe, and a heritage of nearly 100 years globally. There are few insurers that can offer as broad a proposition as AIG – across industries, across multiple lines, and across geographies. The Group remains the same dynamic organisation with great cultural diversity and a leading position across multiple industries and lines of business.

During 2018, the AIG Group welcomed colleagues from Talbot, the Lloyd's of London insurance and reinsurance specialist acquired by AIG through the purchase of Validus in July. The addition of Talbot gives AIG a Lloyd's syndicate as well as expertise in many specialty lines and AIG was pleased that Peter Bilsby, the CEO of Talbot, was appointed Global Head of Specialty Lines for AIG late last year.

2018 was another year of that featured catastrophes across the globe, reinforcing the importance of the insurance industry and the role AIG plays in building resilience for people, businesses and communities. Yet again, the teams in Europe, alongside colleagues across the world, were able to demonstrate AIG's world-class claims service and stand side by side with clients to help them to get back on their feet.

Despite these catastrophes and the continued tough market conditions, AIG UK started 2019 with a strong balance sheet. During 2018 AEL made good progress in reducing expenses, growing the profitable lines of business and remediating those areas that are less profitable.

The AIG, Inc. management team led by Chief Executive Brian Duperreault, CEO of the General Insurance business Peter Zaffino, and CEO of International General Insurance Chris Townsend, have during 2018 developed a clear set of objectives for the business.

The Group's focus in 2019 will be on pursuing profitable growth, on differentiating our value proposition to broker partners and clients, achieving operational excellence and on developing our talent.

## 2018 Company Performance

During 2018 AEL continued its careful focus on risk selection and targeted reinsurance cover. Net Premium Written was slightly lower as higher volumes of business written in our chosen profitable lines were offset by lower volumes in those areas of the business with lower strategic focus. Expenses declined thanks to increased discipline across the business and long-term efficiency savings.

Positive underwriting performance and strategic risk selection combined with lower catastrophic losses led to lower combined ratio for AEL than the previous year and a smaller loss ratio overall.

AIG Life had a successful year in 2018, writing £77.8m of new business premiums and generating UK GAAP pre-tax profits of £33.9m, including £5.3m of investment income. In addition, the Company successfully completed the acquisition of Ellipse, a group protection provider and launched a major partnership with Neilson Financial Services. AIG Life continues to apply industry leading measures to enhance its capital deployment and finished the year with a capital ratio of 223%.

During 2019 AIG UK will continue to focus on profitable growth. This means that AIG UK will look to accelerate growth in certain lines, such as Financial Lines, particularly Cyber and M&A, Accident and Health, certain areas of Specialty and Environmental Liability and also continue to remediate areas of their business that aren't performing.

Finally, people are central to the AIG's success and so the Group will continue to focus on talent during 2019 to ensure that the best people are recruited and retained. This means providing development opportunities, focusing on diversity and inclusion, and working to improve employee engagement.

## **Outlook for 2019**

The economic outlook for 2019 remains challenging. Although AIG is resilient to the future relationship between the UK and the EU, the outcome of these negotiations is still unclear, and this uncertainty is weighing on the economies of the UK, Europe and beyond. Upheaval in other global trade relationships and a shift towards more protectionist policies around the world is also slowing economic growth.

AIG will better differentiate its value proposition for clients and broker partners and continue to focus on operational efficiencies and expense improvement, while also delivering service excellence. This means being clearer about risk appetite and partnering with brokers more effectively to identify opportunities and emerging risks and automating processes and end-to-end operational transformation.

Two years of large catastrophe events mean that there are signs that the prolonged soft market in certain lines is coming to an end. That said, capital continues to enter the industry which means that the market remains highly competitive.

Thanks to the efforts AIG has made over the past years to concentrate on core business and profitable lines the Group enters 2019 with a clear ambition and renewed focus.

**A Baldwin**  
**Chief Executive Officer**

**AIG 100**

## AIG Holdings Europe Limited, AIG Europe Limited and American International Group UK Limited Solvency II Capital Performance at a glance

YE 2018	AIG Holding Europe Limited	AIG Europe Limited	American International Group UK Limited
Own Funds	£3,735.5m	£3,264.2m	£3.68
Solvency Capital Requirement	£2,783.6m <sup>1</sup>	£2,523.6m <sup>2</sup>	£3.28m
Surplus	£951.9m	£740.6m	£0.4m
Solvency Ratio	134.2% <sup>1</sup>	129.4% <sup>2</sup>	111.9%

<sup>1</sup> Partial Internal Model calculation basis

<sup>2</sup> Internal Model calculation basis

### 2018 Solvency and Financial Condition

This document sets out the Solvency and Financial Condition Report for the AIG European Group in accordance with Solvency II Regulations. The group SFCR also includes the solo solvency and financial condition information for AIG Europe Limited and American International Group UK Limited which is shown side-by-side with the AIG European Group information as AEL and AIG UK combined contribute in excess of 90% of the group Solvency Capital Requirement (SCR). After the adoption of the AHEL Partial Internal Model, the SCR decreased in 2018 which resulted in an amount of Tier 2 Own Funds being ineligible when applying Solvency II Tiering rules.

This group SFCR also includes information on two other insurance subsidiaries. AIG Life Limited is a UK insurance subsidiary, which publishes its own solo SFCR separately and is available at <http://www.aiglife.co.uk/>. AIG Israel Insurance Company Limited is a non-UK insurance subsidiary based in Israel and is not subject to Solvency II Regulations.

#### Capital Management

Since September 2017, both the AIG European Group and AEL have been using their Partial Internal Model / Solo Internal Model respectively for the calculation of their Group and Solo SCR. On 27 September 2018 AIG UK also received approval by the PRA to use its Solo Internal Model for the calculation of its Solo SCR post 30 November 2018.

The AIG European Group and AEL view both the Partial Internal Model and Internal Model to be true representations of its risk profile and continue to monitor its solvency by reference to the Internal Model capital requirement.

The AIG European Group's Partial Internal Model Solvency Capital Requirement (PIM-SCR) at 30 November 2018 is £2,783.6m. This is covered by £3,735.5m of eligible capital resources, providing a Solvency II surplus of £951.9m and a Solvency II coverage ratio of 134%. Both metrics are defined by the regulations to mean the excess of the Company's total eligible own funds over its Solvency Capital Requirement.

AIG Europe Limited Internal Model Solvency Capital Requirement (IM-SCR) at 30 November 2018 is £2,523.6m which is the SCR used in the Major Model Change Submission. In line with the Solvency II Regulations and in agreement with the PRA AEL's SCR was frozen to the submission capital requirement. This is covered by £3,264.2m of eligible capital resources, providing a Solvency II surplus of £740.6m and a Solvency II coverage ratio of 129%. Both metrics are defined by the regulations to mean the excess of the Company's total eligible own funds over its Solvency Capital Requirement.

American International Group UK Limited (SF-SCR) at 30 November 2018 is £3.28m. This covered by £3.68m of eligible capital resources, providing Solvency II surplus of £0.4m and Solvency II coverage ratio of 112%. Both metrics are defined by the regulations to mean the excess of the Company's total eligible own funds over its Solvency Capital Requirement.

# AIG European Group Directors' Report

The Directors are responsible for preparing the AIG European Group Solvency Financial Condition Report, including the attached public quantitative reporting templates, in all material respects in accordance with the Solvency II Directive, applicable laws and regulations.

## Statement of Directors' Responsibilities

The Solvency II Directive, the Delegated Acts, related Implementation Rules, Technical Standards and Guidelines, as well as PRA rules provide the regulatory framework in which the AIG European Group operates. The Solvency II rules and regulations include, but are not limited to, the recognition and measurement of its assets and liabilities including Technical Provisions and Risk Margin, the calculation of its capital requirement and the reporting and disclosures of the Solvency II results.

## Compliance with SCR

The AIG European Group has complied with all material respects with Solvency II requirements throughout the financial year 2018. The AIG European Group reasonably believes that it will continue to comply with the Solvency II requirements for the foreseeable future.

## Statement of disclosure of information to auditors

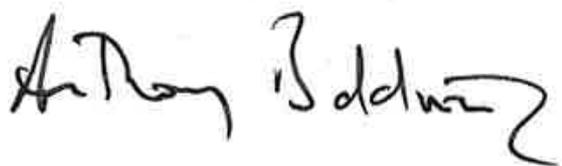
Each of the persons, who are a director in office at the date this report is approved, confirms that:

- so far as each of them is aware, there is no relevant audit information of which the company's auditors are unaware; and
- each of them have taken all the steps that they ought to have taken as a director in order to make themselves aware of any relevant audit information and to establish that the company's auditors are aware of that information.

## Independent Auditors

The AIG European Group has, by elective resolution, dispensed with the appointment of auditors annually and subject to the terms of their appointment, PricewaterhouseCoopers LLP are deemed to continue in office until the resolution is revoked.

On behalf of the Board,



**Anthony Baldwin**  
Chief Executive Officer

## Directors

The listing of Directors as 30<sup>th</sup> November 2018 is as follows:

Director	Mr A Baldwin
Director	Mr J Lenton
Director	Mr C Newby
Director	Mr F Brossart
Director	Mr A Winslow
Independent Non-Executive Director	Mr A Hope
Independent Non-Executive Director	Mr M Bowers
Independent Non-Executive Director	Mr P Tromp
Independent Non-Executive Director	Mr J-M Nessi

# AIG Europe Limited Directors' Report

The Directors are responsible for preparing the Solvency Financial Condition Report, including the attached public quantitative reporting templates, in all material respects in accordance with the Solvency II Directive, applicable laws and regulations.

## Statement of Directors' Responsibilities

The Solvency II Directive, the Delegated Acts, related Implementation Rules, Technical Standards and Guidelines, as well as PRA rules provide the regulatory framework in which the Company operates. The Solvency II rules and regulations include, but are not limited to, the recognition and measurement of its assets and liabilities including Technical Provisions and Risk Margin, the calculation of its capital requirement and the reporting and disclosures of the Solvency II results.

## Compliance with SCR

The Company has complied with all material respects with Solvency II requirements throughout the financial year 2018. The Company reasonably believes that it will continue to comply with the Solvency II requirements for the foreseeable future.

## Statement of disclosure of information to auditors

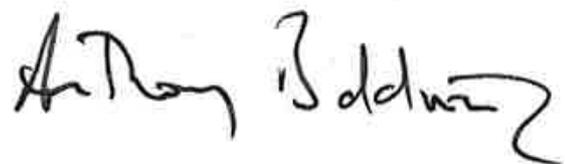
Each of the persons, who are a director in office at the date this report is approved, confirms that:

- so far as each of them is aware, there is no relevant audit information of which the company's auditors are unaware; and
- each of them have taken all the steps that they ought to have taken as a director in order to make themselves aware of any relevant audit information and to establish that the company's auditors are aware of that information.

## Independent Auditors

The Company has, by elective resolution, dispensed with the appointment of auditors annually and subject to the terms of their appointment, PricewaterhouseCoopers LLP are deemed to continue in office until the resolution is revoked.

On behalf of the Board,



**Anthony Baldwin**  
Chief Executive Officer

## Directors

The listing of Directors as 30<sup>th</sup> November 2018 is as follows:

Chief Executive Officer	Mr A Baldwin
Chief Financial Officer	Mr J Lenton
Executive Director	Mr N Minnich
Executive Director	Mr C Newby
Chairman and Independent Non-Executive Director	Mr A Hope
Senior Independent Non-Executive Director	Mr M Bowers
Independent Non-Executive Director	Mr P Tromp
Independent Non-Executive Director	Mr J-M Nessi
Independent Non-Executive Director	Ms C Kampmann

During the year, the following resignations and appointments took place:

Mr P Malvasio	Appointed	15 April 2018
Mr C Townsend	Appointed	25 October 2018

# American International Group UK Limited Directors' Report

The Directors are responsible for preparing the Solvency Financial Condition Report, including the attached public quantitative reporting templates, in all material respects in accordance with the Solvency II Directive, applicable laws and regulations.

## Statement of Directors' Responsibilities

The Solvency II Directive, the Delegated Acts, related Implementation Rules, Technical Standards and Guidelines, as well as PRA rules provide the regulatory framework in which the Company operates. The Solvency II rules and regulations include, but are not limited to, the recognition and measurement of its assets and liabilities including Technical Provisions and Risk Margin, the calculation of its capital requirement and the reporting and disclosures of the Solvency II results.

## Compliance with SCR

The Company has complied with all material respects with Solvency II requirements throughout the financial year 2018. The Company reasonably believes that it will continue to comply with the Solvency II requirements for the foreseeable future.

## Statement of disclosure of information to auditors

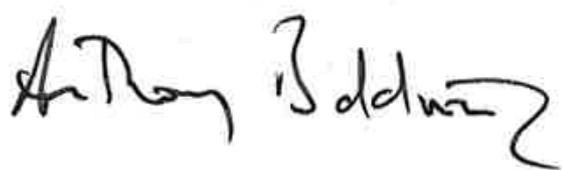
Each of the persons, who are a director in office at the date this report is approved, confirms that:

- So far as each of them is aware, there is no relevant audit information of which the company's auditors are unaware; and
- Each of them have taken all the steps that they ought to have taken as a director in order to make themselves aware of any relevant audit information and to establish that the company's auditors are aware of that information.

## Independent Auditors

The Company has, by elective resolution, dispensed with the appointment of auditors annually and subject to the terms of their appointment, PricewaterhouseCoopers LLP are deemed to continue in office until the resolution is revoked.

On behalf of the Board,



**Anthony Baldwin**  
Chief Executive Officer

## Directors

The listing of Directors as 30<sup>th</sup> November 2018 is as follows:

Chief Executive Officer	Mr A Baldwin
Chief Financial Officer	Mr J Lenton
Executive Director	Mr C Newby
Chairman and Independent Non-Executive Director	Mr A Hope
Senior Independent Non-Executive Director	Mr M Bowers
Independent Non-Executive Director	Mr P Tromp

During the year, the following resignations and appointments took place:

Mr P Malvasio	Appointed	10 October 2018
Mr C Townsend	Appointed	22 November 2018

# Independent Auditors' Report

REPORT OF THE EXTERNAL INDEPENDENT AUDITORS TO THE DIRECTORS OF AIG HOLDINGS EUROPE LIMITED ('THE COMPANY') PURSUANT TO RULE 4.1 (2) OF THE EXTERNAL AUDIT PART OF THE PRA RULEBOOK APPLICABLE TO SOLVENCY II FIRMS

## Report on the Audit of the relevant elements of the Single Group-Wide Solvency and Financial Condition Report

### Opinion

Except as stated below, we have audited the following documents prepared by the Company as at 30 November 2018:

- The 'Valuation for solvency purposes' and 'Capital Management' sections of the Single Group-Wide Solvency and Financial Condition Report of the Company as at 30 November 2018, (**the Narrative Disclosures subject to audit**); and
- Group templates S.02.01.02, S.23.01.22 and S.32.01.22 (**the Group Templates subject to audit**).
- Company templates S.02.01.02, S.12.01.02, S.17.01.02, S.23.01.01 and S.28.02.01 in respect of AIG Europe Limited and company templates S.02.01.02, S.23.01.01, S.25.01.21 and S.28.01.01 in respect of American International Group UK Limited (**the Company Templates subject to audit**).

The Narrative Disclosures subject to audit, the Group Templates subject to audit and the Company Templates subject to audit are collectively referred to as the **'relevant elements of the Single Group-Wide Solvency and Financial Condition Report'**.

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

- Information contained within the relevant elements of the Single Group-Wide Solvency and Financial Condition Report set out above which is, or derives from the Solvency Capital Requirement except insofar as it relates to American International Group UK Limited, as identified in the Appendix to this report;
- The 'Summary', 'Business and performance', 'System of governance' and 'Risk profile' elements of the Single Group-Wide Solvency and Financial Condition Report;
- Group templates S.05.01.02, S.05.02.01 and S.25.02.22;
- Company templates S.05.01.02, S.05.02.01, S.19.01.21 and S.25.03.21;
- The written acknowledgement by management of their responsibilities, including for the preparation of the Single Group-Wide Solvency and Financial Condition Report (**'the Responsibility Statement'**);

To the extent the information subject to audit in the relevant elements of the Single Group-Wide 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.

In our opinion, the information subject to audit in the relevant elements of the Single Group-Wide Solvency and Financial Condition Report of the Company as at 30 November 2018 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals.

### Basis for opinion

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

### Conclusions relating to going concern

ISAs (UK) require us to report to you where:

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

We have nothing to report in respect of the above matters.

However, because not all future events or conditions can be predicted, this statement is not a guarantee as to the Company's ability to continue as a going concern. For example, the terms on which the United Kingdom may withdraw from the European Union are not clear, and, in common with other companies, it is difficult to evaluate all of the potential implications on the Company's trade, customers, suppliers and the wider economy.

### Emphasis of Matter – Basis of Accounting

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

### Other Information

The Directors are responsible for the Other Information.

Our opinion on the relevant elements of the Single Group-Wide Solvency and Financial Condition Report does not cover the Other Information and we do not express an audit opinion or any form of assurance conclusion thereon.

In connection with our audit of the Single Group-Wide Solvency and Financial Condition Report, our responsibility is to read the Other Information and, in doing so, consider whether the Other

Information is materially inconsistent with the relevant elements of the Single Group-Wide Solvency and Financial Condition Report, or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the relevant elements of the Single Group-Wide Solvency and Financial Condition Report or a material misstatement of the Other Information. If, based on the work we have performed, we conclude that there is a material misstatement of this Other Information, we are required to report that fact. We have nothing to report in this regard.

#### **Responsibilities of Directors for the Single Group-Wide Solvency and Financial Condition Report**

The Directors are responsible for the preparation of the Single Group-Wide Solvency and Financial Condition Report 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 made by the PRA under section 138A of FSMA, the PRA Rules and Solvency II regulations on which they are based, as detailed below:

#### **Modifications**

- Permission to publish a Single Group-Wide SFCR

#### **Approvals**

- Approval of items of ancillary own funds
- Approval to use a full or partial internal model

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

#### **Auditors' Responsibilities for the Audit of the relevant elements of the Single Group-Wide Solvency and Financial Condition Report**

It is our responsibility to form an independent opinion as to whether the information subject to audit in the relevant elements of the Single Group-Wide Solvency and Financial Condition Report is prepared, in all material respects, in accordance with financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

Our objectives are to obtain reasonable assurance about whether the relevant elements of the Single Group-Wide Solvency and Financial Condition Report are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but it is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material

misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decision making or the judgement of the users taken on the basis of the Single Group-Wide Solvency and Financial Condition Report.

A further description of our responsibilities for the audit is located on the Financial Reporting Council's website at: [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of our auditors' report.

This report, including the opinion, has been prepared for the Board of Directors of the Company in accordance with 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.

#### **Other Matter**

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

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

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

**PricewaterhouseCoopers LLP**  
Chartered Accountants  
7 More London Riverside, London, SE1 2RT, UK  
2 May 2019

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

The relevant elements of the Single Group-Wide Solvency and Financial Condition Report that are not subject to audit comprise:

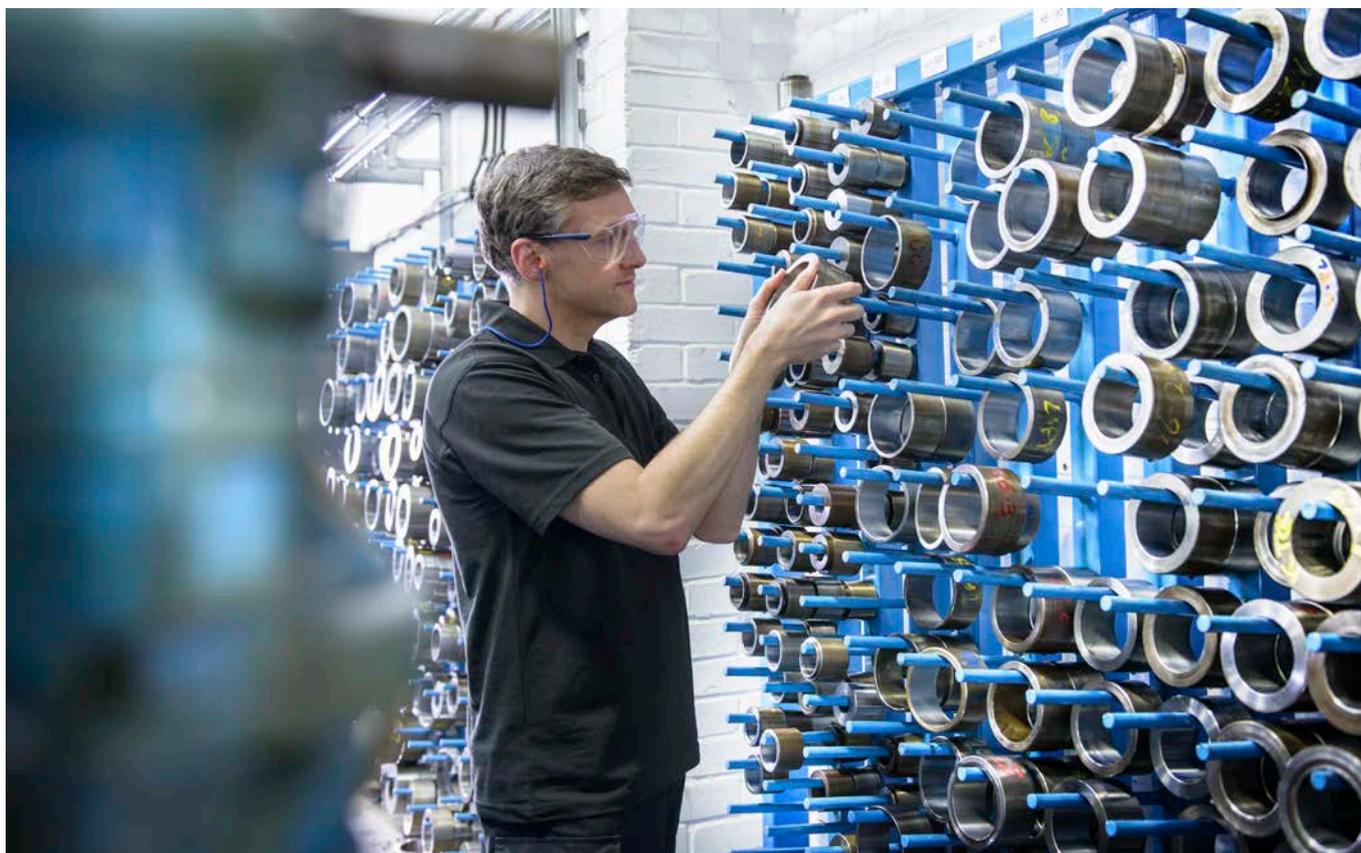
- The following elements of Group template S.02.01.02:
  - Row R0550: Technical provisions - non-life (excluding health) - risk margin
  - Row R0590: Technical provisions - health (similar to non-life) - risk margin
  - Row R0640: Technical provisions - health (similar to life) - risk margin
  - Row R0680: Technical provisions - life (excluding health and index-linked and unit-linked) - risk margin
  - Row R0720: Technical provisions - Index-linked and unit-linked - risk margin
- The following elements of Group template S.23.01.22
  - Row R0020: Non-available called but not paid in ordinary share capital at group level
  - Row R0060: Non-available subordinated mutual member accounts at group level
  - Row R0080: Non-available surplus at group level
  - Row R0100: Non-available preference shares at group level
  - Row R0120: Non-available share premium account related to preference shares at group level
  - Row R0150: Non-available subordinated liabilities at group level
  - Row R0170: The amount equal to the value of net deferred tax assets not available at the group level
  - Row R0190: Non-available own funds related to other own funds items approved by supervisory authority
  - Row R0210: Non-available minority interests at group level
  - Row R0380: Non-available ancillary own funds at group level

Row R0680: Group SCR

Row R0740: Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds

Row R0750: Other non-available own funds

- The following elements of Company template S.02.01.02:
  - Row R0550: Technical provisions - non-life (excluding health) - risk margin
  - Row R0590: Technical provisions - health (similar to non-life) - risk margin
  - Row R0640: Technical provisions - health (similar to life) - risk margin
  - Row R0680: Technical provisions - life (excluding health and index-linked and unit-linked) - risk margin
  - Row R0720: Technical provisions - Index-linked and unit-linked - risk margin
- The following elements of Company template S.12.01.02
  - Row R0100: Technical provisions calculated as a sum of BE and RM - Risk margin
- The following elements of Company template S.17.01.02
  - Row R0280: Technical provisions calculated as a sum of BE and RM - Risk margin
- The following elements of Company 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 of the Narrative Disclosures subject to audit identified as 'unaudited'.



## Solvency & Financial Condition Report 2018

### A. Business and Performance

This section of the report sets out the details regarding AIG Holdings Europe Limited's business structure, key operations, market position and the financial performance for 2018.

**KEY ELEMENTS OF THE SECTION ARE:**

- Business information;
- Underwriting Performance;
- Investment Performance; and
- Performance from other activities.

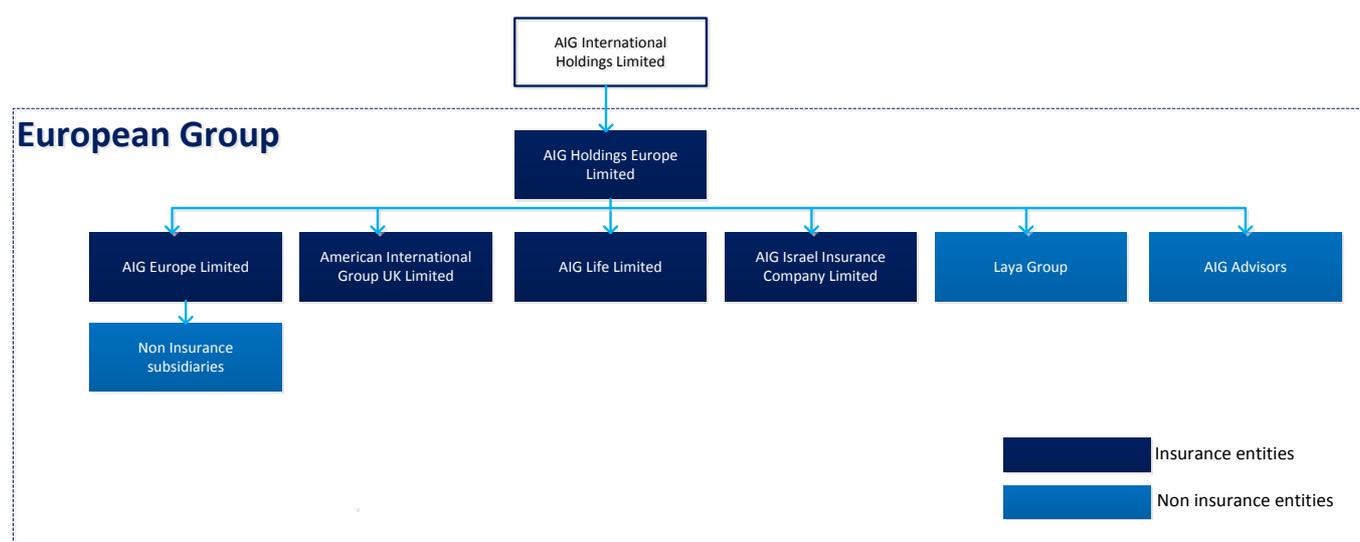
# A.1 Business

## EUROPEAN GROUP INFORMATION

The European Group is made up of AIG Holdings Europe Limited (AHEL) and its subsidiaries. The Group is formed in a simple structure so as to enable efficient decision making and delegation of responsibilities. The component entities of the European Group are fairly autonomous in their own right.

AHEL is a wholly owned subsidiary of AIG International Holdings Limited, a Swiss incorporated company. Its ultimate parent company is AIG Inc., a U.S company with headquarters in New York City.

A simplified group structure as at 30<sup>th</sup> November 2018 is shown in the diagram below:



AIG Europe Limited (AEL), American International Group UK Limited (AIG UK) and AIG Life Limited (AIG Life) are insurance companies incorporated in the United Kingdom. They are authorised and regulated by the Prudential Regulation Authority (PRA) and the Financial Conduct Authority (FCA). AEL is the core subsidiary of the European Group, representing 94% of the Group's net assets as at 30<sup>th</sup> November 2018. AEL is a multiline insurance company writing substantially all lines of property and casualty insurance. Major lines of insurance written include commercial, consumer, accident and health and specialty coverage. At 1<sup>st</sup> December 2018 AEL's UK portfolio was transferred to AIG UK with the EEA portfolio transferred out of AEL into AESA (AIG Europe SA) via a Part VII Transfer and AEL was dissolved.

AEL, AIG UK and AIG Life are all in scope of Solvency II.

This Single Solvency and Financial Condition Report (SFCR) is prepared in accordance with Article 256(2) of the Solvency II Directive and paragraph 3 from the Reporting Section of PRA's Rulebook and covers AHEL, AEL and AIG UK.

The AIG Life 2018 SFCR report is separately reported and available for download from <http://www.aiglifeco.uk/>.

The Solvency and Financial Condition Report (SFCR) is presented in millions of pounds sterling, and the attached public quantitative reporting templates (QRTs) in Appendix F are in thousands of pounds sterling as set out in Article 2 of the Commission Implementing Regulation (EU) 2015/2452. The functional and reporting currency of the Company is pounds sterling.

The European Group's third insurance company, AIG Israel Insurance Company Limited (AIG Israel) has been granted licence by the Israeli Commissioner of the Capital Markets and Insurance (ICMI) to write general and life insurance business in Israel.

AIG Israel is not in scope of Solvency II, however for the purpose of calculation of the Group's solvency position, its capital resources and requirements are valued in accordance with Solvency II rules and regulations as applicable.

The European Group's registered office address and the contract details of its external auditors and supervisory authorities are shown below:

### Registered Office

The AIG Building  
 58 Fenchurch Street  
 London EC3M 4AB  
 +44 (0) 20 7954 7000

### External Auditors

PricewaterhouseCoopers LLP  
 7 More London Riverside  
 London EC2R 6DA  
 +44 (0) 20 7583 5000

### Supervisory Authority

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

The group SFCR has been authorised for issue by the Board of Directors on 24 April 2019.

**MATERIAL PARTICIPATING UNDERTAKINGS**

The European Group's participating undertakings as at 30<sup>th</sup> November 2018 are listed in the table below.

Participation	Principal Activity	Country	Ownership
AIG Europe Limited	UK composite insurer operating across 27 countries in Europe.	UK	100%
American International Group UK Limited	UK composite insurer operating in the UK.	UK	100%
AIG Life Limited	UK life insurer specialising in protection products	UK	100%
AIG Israel Insurance Company Limited	Israel insurer specialising in retail general, life and health insurance policies	Israel	100%
Avondhu Limited	Holding company for Laya Healthcare Limited (Laya Group)	Jersey	100%
Laya Healthcare Limited	Provision of insurance intermediary services in the Irish market	Ireland	100%
AIG Advisors Srl	Provision of insurance intermediary services to affiliates within the AIG Inc. group	Italy	100%
AIG Europe (Services) Limited	Provision of operational and administrative services to affiliates within the AIG Inc. group	UK	100%
AIG Medical Management Services UK Limited	Provision of case management and occupational health services	UK	100%
AIG Receivables Management Limited	Provision of technology based receivables management products	UK	100%
AIG Trade Finance Limited	Provision of technical knowledge in trade finance	UK	100%
AIG Global Reinsurance Operations Limited	Provision of (re)insurance intermediary services within the AIG Inc. group	Belgium	100%
AIG Germany Holdings GmbH	Holding company for Wynona 1837 GmbH	Germany	100%
Wynona 1837 GmbH	Sole purpose is to manage an interest entitling it to a share of profits of AEL's German branch	Germany	100%
Hansa GmbH	General Partner and Managing Director of Hansa KG.	Germany	100%
Hansa Grundstückverwaltungs GmbH & Co KG	Real estate management	Germany	94.499%
CI Group	Provision of commercial insurance brokerage and intermediary services	UK	20%

AEL, the largest subsidiary of the European Group, operates from 27 country branches. AEL has passporting rights in 6 other EEA countries including Croatia, Estonia, Gibraltar, Iceland, Latvia and Slovenia but it is currently not actively pursuing business in these countries. AIG Israel operates from Israel and AIG Life operates from the UK, Channel Islands, Isle of Man and Gibraltar. The European Group does not directly have any branches, these are at the AEL subsidiary level. It employs more than 4,000 staff, who facilitate the operation of a company that specialises in dealing with the top end of the global insurance market, particularly multinational corporations, where AIG's wide global reach, product range and large capital base can be used to write business in smaller countries and leverage the size of the group through the use of global reinsurance treaties.

In anticipation of the UK leaving the European Union, AIG undertook a comprehensive exercise reviewing its structure and made the decision to restructure its operations in Europe. From the existing AEL insurance business, AIG created two separate entities, one based in the UK (AIG UK) and one based in Luxembourg (AIG Europe SA – "AESA") which is an EEA country and affords access to the EU freedoms. AESA is under the supervision of the Luxembourg Regulator the Commissariat aux Assurances (CAA) whilst AIG UK is supervised by the UK Regulator the PRA. The restructure was effected on 1<sup>st</sup> December 2018 by way of a UK Part VII transfer of the UK business to AIG UK followed by a European Cross Border Merger of AEL into AESA.

The European Group solvency position is calculated using Method 1: Accounting Consolidation as prescribed in Article 230 of the Solvency II Directive. Using this method, insurance holding companies, insurance undertakings and ancillary service undertakings are fully consolidated. The entities that do not fall within one of those three classifications are consolidated using the adjusted equity method.

AHEL has taken advantage of the exemption in Section 401 of Companies Act 2006 from the requirement to produce consolidated financial statements.

## AIG EUROPEAN GROUP MATERIAL LINES OF BUSINESS BY OPERATING SEGMENT AND SOLVENCY II

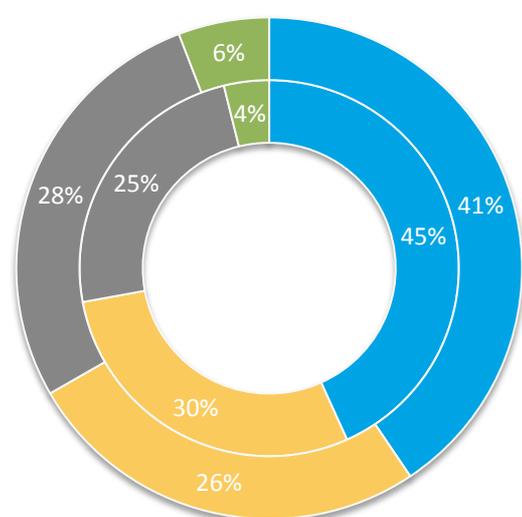
AEL, as the core insurance subsidiary, contributed 91.7% of the European Group's aggregated net written premiums for FY2018. AEL's business segments are organised into Commercial and Consumer lines. Commercial lines refer to products and services for the commercial and institutional customers. This line represents around 74% of the AEL's net premiums written. Product lines include traditional types such as general liability, property and financial lines; and highly specialised ones for political risk, cyber security and aviation. Consumer lines focus on customer-centric services, innovating product offerings and developing strong distribution relationships. Main product types in this segment are personal accident, income protection and

medical expense cover.

AIG Israel contributed 4.6% of the European Group's aggregated net written premium for FY2018. The majority of AIG Israel's business is on the consumer side, these being retail policies which are marketed, sold and serviced directly to customers either through call centres or online. Most of the commercial business and a small proportion of its retail business is also sold through intermediaries.

AIG Life contributed 3.7% of the European Group's aggregated net written premium for FY2018. AIG Life is a provider of long term life insurance, critical illness and income protection products. Products are sold through intermediaries and distribution partnerships. All of AIG Life's products are considered to belong within two business segments, Life and Health.

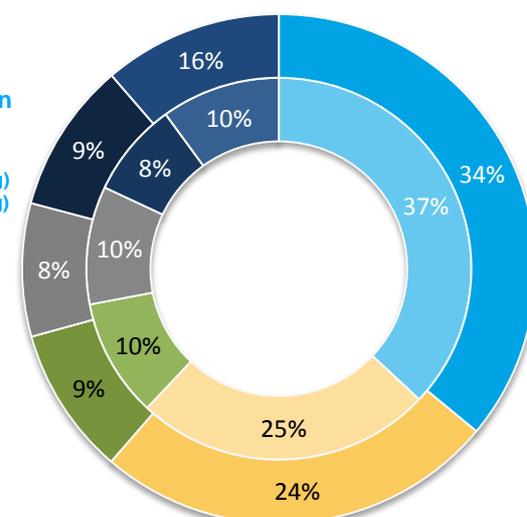
### Insurance LoB and operating segments



### Net Premiums Written (NPW)

2018: £4,131.1m (outer ring)  
2017: £4,072.9m (inner ring)

### Solvency II LoB



#### LIABILITY AND FINANCIAL LINES (LFL)

Constitutes the largest section of the Commercial insurance segment of the Company at 41% of Net Premiums Written in 2018 (2017: 45%). AEL is a market leader in multiple Financial Lines products including Directors and Officers liability, Cyber insurance, M&A insurance, Kidnap & Ransom insurance and Professional liability insurance.

#### PROPERTY AND SPECIAL RISKS (PSR)

Represents the Company's second largest Commercial insurance segment at 26% of Net Premiums Written in 2018 (2017: 30%) and Includes Property Insurance products for Commercial Properties, Upstream and Downstream Energy, Power Generation, Oil Rig, Chemicals, Mining and Construction and Speciality Insurance products.

#### PERSONAL INSURANCE (PI)

Amounts to 28% of Net Premiums Written in 2018 (2017: 25%) for the Company and includes Personal Accident and Health, Personal Property, Personal Auto and Service Programmes.

#### LIFE AND HEALTH INSURANCE (LAH)

Amounts to 6% of Net Premiums Written in 2018 (2017: 4%) for the Company and includes Health and Life products provided by AIG Life and AIG Israel.

Under Solvency II, insurance products and offerings are categorised into 16 standardised Solvency II lines of business (LoB). The Group's top 5 material Solvency II LoBs by Net Premiums Written in 2018 are:

- GENERAL LIABILITY (34%)
- FIRE AND OTHER DAMAGE TO PROPERTY (24%)
- MARINE, AVIATION AND TRANSPORT (9%)
- INCOME PROTECTION (8%)
- MOTOR VEHICLE LIABILITY (9%)
- "Others" Solvency II LoB consist largely of Medical Expense Insurance, Miscellaneous Financial Loss insurance and Credit, Suretyship insurance and Health collectively representing c.16% of the European Group's net premiums written.

Source Group QRT S.05.01

## SIGNIFICANT EVENTS DURING THE REPORTING PERIOD AND UP TO THE DATE OF THE REPORT

### Brexit

In anticipation of the UK leaving the European Union, AIG undertook a comprehensive exercise reviewing its structure and made the decision to restructure its operations in Europe.

From the existing AEL insurance business, AIG created two separate entities, one based in the UK (AIG UK) and one based in Luxembourg (AIG Europe SA – “AESAs”) which is an EEA country and affords access to the EU freedoms. AESA is under the supervision of the Luxembourg Regulator the Commissariat aux Assurances (CAA) whilst AIG UK is supervised by the UK Regulator the PRA.

The restructure was effected on 1<sup>st</sup> December 2018 by way of a UK Part VII transfer of the UK business to AIG UK followed by a European Cross Border Merger of AEL into AESA as a result of which AEL was dissolved.

### Internal Model Major Model Change Approval

On 29<sup>th</sup> March 2018, AHEL applied for a Major Model Change to the PRA requesting to include AIG UK in its scope of its Partial Internal Model and use an Internal Model to calculate AIG UK's Solo SCR. The PRA approved the request on 27<sup>th</sup> September 2018 and from 1<sup>st</sup> December 2018 AIG UK can use their Internal Model to calculate their Solo SCR and AIG UK will be included in the scope of AHEL's Partial Internal Model.

The Standard Formula SCR is a one size fits all capital calculation which provides for a generic benchmark which comprises of standardised risk modules calculated using a number of pre-determined factors and aggregated through EIOPA-specified correlation matrices.

Whilst the Standard Formula SCR is a good fit for most insurance firms with relatively low variety of insurance product offerings and straightforward investment strategy, it has inherent limitations. The Standard Formula SCR is more rigidly defined, formulaic and not calibrated to accurately reflect the complexities of a diverse multinational insurance firm such as AIG Europe.

The Company's Internal Model is a better reflection of its capital requirements on a true economic basis and better aligned to its business model. The Internal Model approval demonstrates the regulator's confidence in AIG's technical modelling capabilities and in the Board and Management's understanding of the model and the effectiveness of the governance supporting the model and its use in the business, as described in Section B System of Governance in this report.

## A.2 Underwriting Performance – European Group

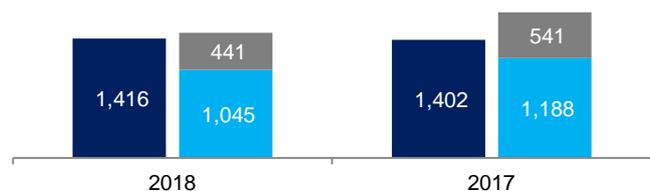
### UNDERWRITING PERFORMANCE BY MATERIAL LINES OF BUSINESS AND GEOGRAPHICAL AREAS

Under Solvency II, the lines of business are pre-defined with majority of the business originating from the lines highlighted in the section A.2.A1.

#### A.2.A1 UNDERWRITING PERFORMANCE BY SOLVENCY II LINES OF BUSINESS

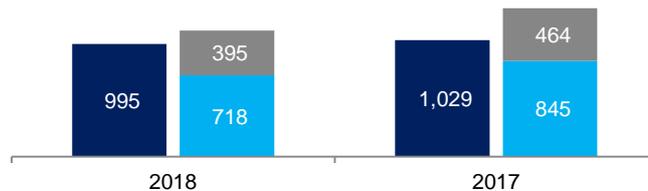
The diagrams below provide key performance indicators (Net Premium Earned, Claims Incurred and Expenses) for major Solvency II lines of business as per the Group QRT S05.01.

##### General Liability



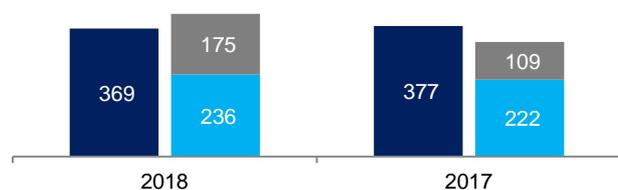
Top line growth driven by profitable segments (mostly UK) mitigated by remediation actions across all zones. Loss ratio slight improvement driven by business mix improvement more than offsetting some adverse loss pick updates

##### Fire and Other Damage to Property



Portfolio underwriting performance impacted by significant natural catastrophe losses (Storm David, Storm Michael, Kuwait Floods) and increase in attritional loss activity in the Property business. Expenses decrease through net commission management and general overhead discipline.

##### Marine, Aviation and Transport



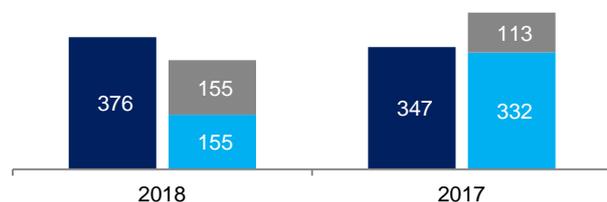
Net premiums decrease due to increased reinsurance protection. loss ratio increase driven by PYD benefit in 2018.

##### Income Protection



Premiums decrease driven by higher competition on new business and renewal business. Loss ratio increase driven by unfavourable experience across Group business.

##### Motor Vehicle Liability



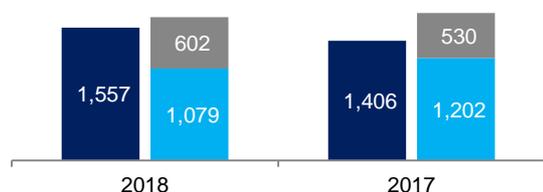
Top line growth mostly driven by UK and France. Loss ratio impacted by favourable trends in Ireland and Italy.

■ Premiums ■ Claims ■ Expenses

## A.2.A2 UNDERWRITING PERFORMANCE BY MATERIAL GEOGRAPHICAL AREAS

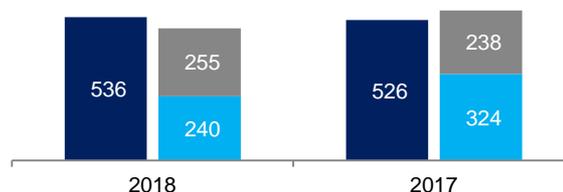
The European Group's material geographical areas are the United Kingdom (37.7%), France (13.0%), Germany (9.4%), Italy (8.7%), Ireland (5.6%) and Spain (2.8%). These six countries make up 77.2% of the Group's Net Premiums Earned in FY 2018. The underwriting performance of each geographic region, as shown in table below, takes into account life and non-life business that relates to that region as per the Group QRT S.05.02.

### United Kingdom



Net premium earned increased by 10.7%, claims decreased by 10.2% and expenses increased by 13.7%. Increase in net premium earned is driven by higher margins from Financial Lines and Casualty. Decrease in loss ratios partially driven by remediation actions across the UK zone.

### France



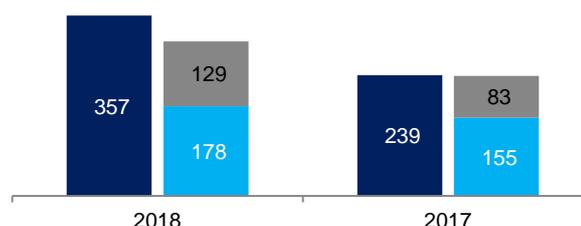
Net premium earned remained relatively stable. Losses impacted by Storm David.

### Germany



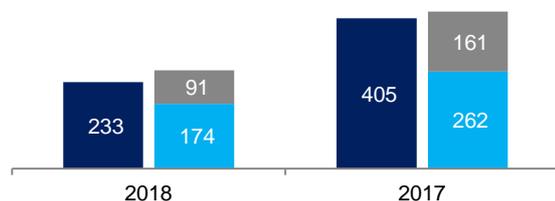
Net premium earned remained relatively stable. Loss ratio improvement driven by improvements in the business mix and profitability of the book.

### Italy



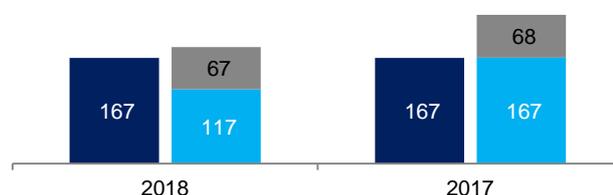
The Italian market experienced moderate growth in net premiums earned due to higher premium retention. The losses increased due to CAT losses relating to storms.

### Ireland



The Irish market experienced decrease in net premium earned due to higher competition on new business and renewal business.

### Spain



Net premium earned remained stable and claims decreased by 29.8% due to remediation actions across the South zone.

■ Premiums ■ Claims ■ Expenses

# A.2 Underwriting Performance – AIG Europe Ltd

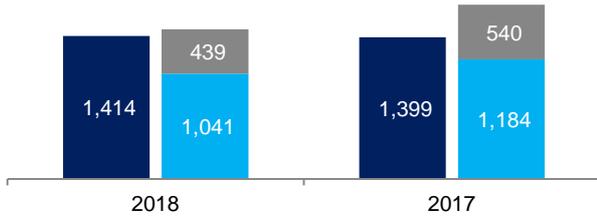
## UNDERWRITING PERFORMANCE BY MATERIAL LINES OF BUSINESS AND GEOGRAPHICAL AREAS

### A.2.B AIG EUROPE LIMITED

#### A.2.B.1 UNDERWRITING PERFORMANCE BY SOLVENCY II LINES OF BUSINESS

The diagrams below provide key performance indicators (Net Premium Earned, Claims Incurred and Expenses) for major Solvency II lines of business as per AEL's QRT S.05.01.

##### General Liability



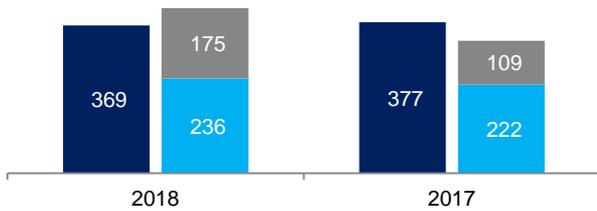
Top line growth driven by profitable segments (mostly UK) mitigated by remediation actions across all zones. Loss Ratio slight improvement driven by business mix improvement more than offsetting some adverse loss pick updates

##### Fire and Other Damage to Property



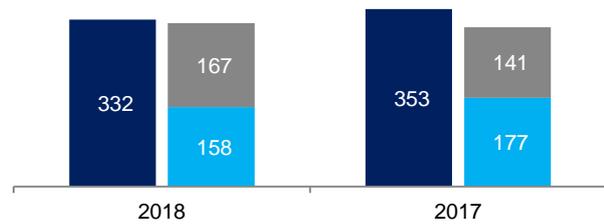
Portfolio underwriting performance impacted by significant natural catastrophe losses (Storm David, Storm Michael, Kuwait Floods) and increase in attritional loss activity in the Property business. Expenses decrease through net commission management and general overhead discipline.

##### Marine, Aviation and Transport



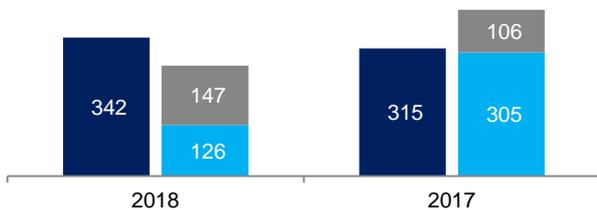
Net premiums decrease due to increased reinsurance protection. Loss ratio increase driven by PYD benefit in 2018

##### Income Protection



Premiums decrease driven by higher competition on new business and renewal business. Loss ratio increase driven by unfavourable experience across Group business.

##### Motor Vehicle Liability



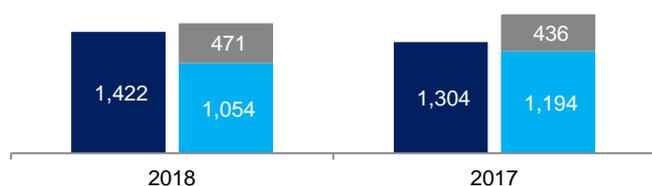
Top line growth mostly driven by UK and France. Loss ratio impacted by favourable trends in Ireland and Italy.

■ Premiums ■ Claims ■ Expenses

### A.2.B2 UNDERWRITING PERFORMANCE BY MATERIAL GEOGRAPHICAL AREA

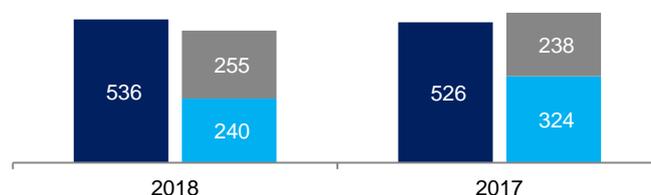
For AIG Europe Limited, the material geographical areas are the United Kingdom (37.1%), France (14.0%), Germany (10.1%), Italy (9.3%), Ireland (6.1%) and Spain (4.4%). These six countries make up 80.9% of AIG Europe Limited's Net Premiums Earned in FY 2018. The underwriting performance of each geographic region, as shown in table below, takes into account life and non-life business that relates to that region as per AEL's QRT S.05.02.

#### United Kingdom



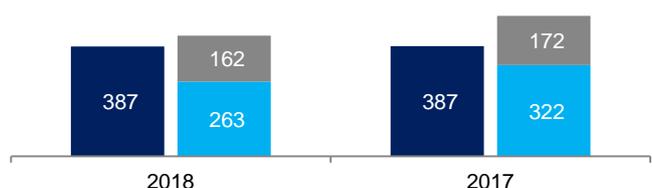
Net premium earned increased by 9.8%, claims decreased by 10.3% and expenses increased by 19.7%. Increase in net premium earned is driven by higher margins from Financial Lines and Casualty. Decrease in loss ratios partially driven by remediation actions across the UK zone.

#### France



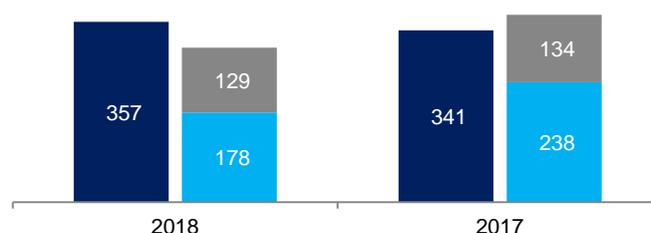
Net premium earned remained relative stable. Losses impacted by Storm David.

#### Germany



Net premium earned remained relatively stable. Loss ratio improvement driven by improvements in the business mix and profitability of the book.

#### Italy



The Italian market experienced moderate growth in net premiums earned due to higher premium retention. The losses increased due to CAT losses relating to storms.

#### Ireland



The Irish market experienced decrease in net premium earned due to higher competition on new business and renewal business.

#### Spain



Net premium earned remained stable and claims decreased by 29.8% due to remediation actions across the South zone.

■ Premiums ■ Claims ■ Expenses

## A.3 Investment Performance

### A.3.A AIG EUROPEAN GROUP INVESTMENT RETURN

Investment performance is defined as net investment income, realised and unrealised gains and losses less investment management expenses.

The European Group's investment performance by asset class for FY 2018 and 2017 are shown in the table below:

Asset Classes £'m	Gross Investment Income		Realised Gains and Losses		Unrealised Gains and Losses (recognised in Equity)		Total Investment Return	
	2018	2017	2018	2017	2018	2017	2018	2017
Corporate Bonds	107.8	170.5	13.5	17	-125.9	-60.6	-4.7	127
Government Bonds	39	90.9	-1	3	-16	-98	21.4	-4.1
Securitised Assets	1.1	1.2	0.1	5.7	0	0.1	1.2	7
Mutual Funds	0	0	0	-0.9	0	0.9	0.0	0
Equity Instruments	0	0.3	0.3	0	0	0	0.3	0.3
Loan Participations	12.3	8.9	0.7	3.3	-0.6	-2.7	12.4	9.5
Short Term Deposits	2.7	2.5	0.0	0	0.0	0	2.7	2.5
<b>Total</b>	<b>162.9</b>	<b>274.3</b>	<b>13.1</b>	<b>28.2</b>	<b>-142.6</b>	<b>-160.3</b>	<b>33.3</b>	<b>142.1</b>

Source: AEL, AIG Life, AIG Israel QRT.S.09.01.01

£33.3m of total investment returns are made up of:

- (£142.6m) unrealised losses mainly driven by a rise in credit spreads and higher USD interest rates.
- £13.1m realised gains on disposals are driven by a fall in interest rates and favourable credit spread movements at the time of disposal.
- £162.9m investment income mostly representing coupon payments from corporate and government bonds.

### A.3.B AIG EUROPE LIMITED INVESTMENT RETURN

The Company's investment management framework sets out its Strategic Asset Allocation (SAA) that is approved by the Board and is reviewed annually. Assets categories that are included in the SAA are those that are suitable for the Company's liabilities profile by nature, term and currency and for which the investment manager could assess, monitor and control risks. In order to achieve this objective, the Company holds a diversified investment portfolio that is invested in government bonds, corporate bonds, securitised assets, loans, mutual funds, equities, investments in group undertakings and cash.

The Company measures its investment performance using total investment return which comprises of Net Investment Income (NII) and other gains and losses comprising of realised and unrealised gains and losses and impact of movements in foreign exchange rates.

NII is the investment income net of investment management expenses. The unrealised gains/losses on financial assets arise from Available for Sale (AFS) instruments only and are recognised directly in equity.

Asset Classes £'m	Gross Investment Income		Investment Expenses		Net Investment Income (NII)		Realised Gains and Losses		Unrealised Gains and Losses (recognised in Equity)		Forex gains and losses		Total Investment Return	
	2018	2017	2018	2017	2018	2017	2018	2017	2018	2017	2018	2017	2018	2017
Corporate Bonds	98.3	132.8	-8.9	-8.7	89.4	124.1	15.2	41.9	-120.6	-47.4	55.0	-38.5	39.2	80.1
Government Bonds	30.8	33.4	-6.0	-7	24.8	26.4	1.8	6.4	-13.6	-27	6.2	-15.5	19.3	-9.8
Securitised Assets	1.1	3.2	0.0	-0.1	1.1	3.1	0.1	10.8	0.0	-5.1	0.2	0	1.3	8.8
Mutual Funds	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0.1	0.0	0	0.0	0.1
Equity Instruments	0.0	0.4	-0.2	0	-0.2	0.4	0.3	0	0.0	0	0.9	0	0.9	0.4
Loan Participations	12.3	13.1	-0.6	-0.9	11.7	12.3	0.7	0	-0.6	0	0.3	3.1	12.0	15.4
Short Term Deposits	2.5	2.3	0.0	-0.2	2.5	2.1	0.0	0	0.0	0	0.0	0	2.5	2.1
<b>Total</b>	<b>145.0</b>	<b>185.2</b>	<b>-15.7</b>	<b>-16.9</b>	<b>129.3</b>	<b>168.4</b>	<b>18.1</b>	<b>59.1</b>	<b>-134.8</b>	<b>-79.4</b>	<b>62.6</b>	<b>-50.9</b>	<b>75.2</b>	<b>97.1</b>

The split of Total Investment Return of £75.2m by components and by assets classes is given below and it is mainly driven by;

- £129.3m NII mainly driven by interest income of Corporate Bonds. The fall in NII is driven by low yields on bonds.
- £18.1m realised gains on disposal of bonds.
- Partly offset by £134.8m unrealised losses due to higher credit spreads and USD interest rates.

### GAINS AND LOSSES RECOGNISED IN EQUITY

Net unrealised losses recognised in equity for 2018 amount to £134.8m (2017: £79.4m) mainly attributable to fall in price of bonds due to corporate spread widening and increase in interest rates.

### INVESTMENTS IN SECURITISATION

The Company's holdings in securitised assets as shown on its statutory financial statements is as follows:

Investments in Securities, £m	2018	2017
RMBS	0.0	0.0
CMBS	27.0	54.3
<b>Total</b>	<b>27.0</b>	<b>54.3</b>

**A.3.B AMERICAN INTERNATIONAL GROUP UK LIMITED INVESTMENT RETURN**

The Company's investment management framework sets out its Strategic Asset Allocation (SAA) that is approved by the Board and is reviewed annually. Assets categories that are included in the SAA are those that are suitable for the Company's liabilities profile by nature, term and currency and for which the investment manager could assess, monitor and control risks. In order to achieve this objective, the Company holds a diversified investment portfolio that is invested in government bonds, corporate bonds, securitised assets, loans, mutual funds, equities, investments in group undertakings and cash.

The Company measures its investment performance using total investment return which comprises of Net Investment Income (NII) and other gains and losses comprising of realised and unrealised gains and losses and impact of movements in foreign exchange rates.

NII is the investment income net of investment management expenses. The unrealised gains/losses on financial assets arise from Available for Sale (AFS) instruments only and are recognised directly in equity.

Asset Classes £'m	Gross Investment Income		Investment Expenses		Net Investment Income (NII)		Realised Gains and Losses		Unrealised Gains and Losses (recognised in Equity)		Forex gains and losses		Total Investment Return	
	2018	2017	2018	2017	2018	2017	2018	2017	2018	2017	2018	2017	2018	2017
Corporate Bonds	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Government Bonds	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Securitised Assets	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Mutual Funds	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Equity Instruments	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Loan Participations	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Short Term Deposits	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

**GAINS AND LOSSES RECOGNISED IN EQUITY**

Net unrealised losses recognised in equity for 2018 amount to £0.0m (2017: £0.0).

**INVESTMENTS IN SECURITISATION**

The Company's holdings in securitised assets as shown on its statutory financial statements is as follows:

Investments in Securities, £m	2018	2017
RMBS	0.0	0.0
CMBS	0.0	0.0
<b>Total</b>	<b>0.0</b>	<b>0.0</b>

## A.4 Performance from Other Activities

### A.4.A AIG EUROPEAN GROUP

No other activities are material to the AIG European Group.

### A.4.B AIG EUROPE LIMITED

The 'Performance from other activities' subsection of the report aims to provide an overview of the qualitative and quantitative information regarding income from other activities, other expenses and lease arrangements.

#### OTHER MATERIAL INCOME AND EXPENSES

Other material income and expenses, £m	2018	2017
Net foreign exchange (losses)/gains	76	89.6
Administrative expenses	608	687.2

The Company operates in a number of overseas branches. Each overseas branch determines its own functional currency based on factors specific to its operations and is usually the currency of the primary economic environment in which it operates.

The Company hedges the foreign exchange risk arising from the retranslation of its Euro functional currency branches.

Foreign exchange gains and losses resulting from the settlement of foreign currency transactions and the translation of foreign currency denominated monetary assets and liabilities at year end exchange rates are recognised in the income statement as part of other income.

Administrative expenses are incurred to support the infrastructure of the organisation and include but are not limited to personnel costs, projects and bad debt expenses.

## A.5 Any other Material Information

### A.5.A AIG EUROPEAN GROUP

There were no significant intra-group transactions during the reporting period. As at 30<sup>th</sup> November 2018, there is no other material information regarding Business and Performance of the Company.

### A.5.B AIG EUROPE LIMITED

As at 30<sup>th</sup> November 2018, there is no other material information regarding Business and Performance of the Company.

### A.5.C AIG LIFE LIMITED

As at 30<sup>th</sup> November 2018, there is no other material information regarding Business and Performance of the Company.

### A.5.D AMERICAN INTERNATIONAL GROUP UK LIMITED

As at 30<sup>th</sup> November 2018, there is no other material information regarding Business and Performance of the Company.



## Solvency & Financial Condition Report 2018

### B. System of Governance

The 'System of Governance' section of the report sets out details regarding the administration and management of the Company. The section also outlines the process of risk management and the fit and proper and outsourcing arrangements put in place.

**KEY ELEMENTS OF THE SECTION ARE:**

- Overview of the System of Governance;
- Fit and Proper;
- Risk Management System;
- Own Risk and Solvency Assessment; and
- Outsourcing arrangements.

## B.1 General Information on the System of Governance

The European Group’s ‘General Information on the System of Governance’ subsection of the report aims to provide details of the European Group’s management structure along with roles and responsibilities and key functions of various committees and working groups.

### B.1.A. MANAGEMENT AND GOVERNANCE STRUCTURE

The European Group’s business strategy and operations operate within its governance structure, of which the management of risk plays a significant part. Governance starts with the European Group’s Board, which has overall responsibility for management of the company through providing leadership of the company within a framework of prudent and effective controls which enables each of the risks faced by the Company to be assessed and managed. The governance structure provides oversight and direction to the European Group.

Included in the governance framework is the risk management framework which supports the European Group’s risk culture. The risk framework covers the Company’s business and operations functions and risk areas. It sets out the risk committees, risk

reporting and risk controls. The risk governance structure provides an oversight and decision-making framework within which material risks are continually identified, assessed, monitored and managed at a regional level, utilising outputs from the Economic Capital Model (ECM), where appropriate.

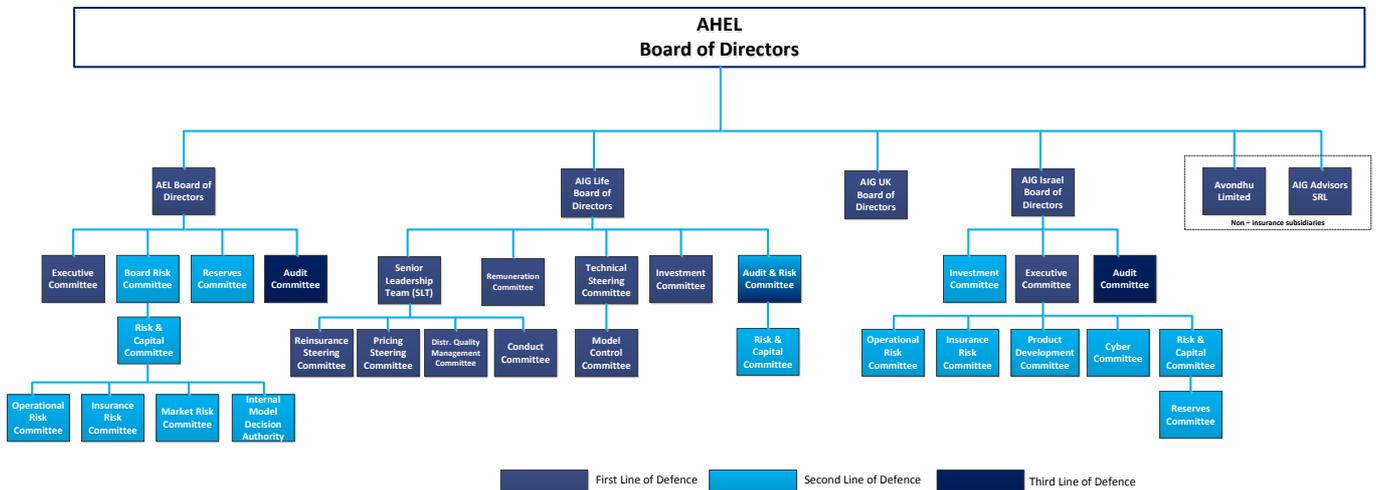
The governance structure has three levels of committees:

- 1) Board committees;
- 2) Executive Risk committees; and
- 3) Working Group committees.

It is designed to support the Company’s in embedding a strong risk culture through the integration of risk management with regulatory requirements and business activities such as strategy and planning. Each of these committees has a distinct role to play within the Company’s risk governance framework.

The organisation chart below provides a high-level overview of the Company’s governance structure:

### EUROPEAN GROUP STRUCTURE



### EUROPEAN GROUP BOARD

The European Group’s Board has overall responsibility for the management of the Company. As the holding company of the European Group, the Group Board is in particular responsible for ensuring it has visibility across all its subsidiaries so that it is able to identify risks present within the European Group to which insurers and their policyholders may be exposed which are not apparent when looking at the solo entities, and that effective controls are in place. The Board is also responsible for ensuring that the Group Solvency Capital Requirement is met and that the Company adheres to applicable regulations under the Solvency II legislation, including various reporting obligations.

The Board meets at least four times a year with more frequent meetings as required. It is composed of a mix of AEL Executive Directors, Independent Non-Executive Directors and AIG Life Executive Directors so as to achieve a balance of skills, experience, challenge and debate and so that no individual or small group of individuals can dominate its decision taking.

**Allocation of responsibilities**

The European Group’s system of governance is broadly aligned to its organisation structure above. The AHEL Board is able to fulfil its duties through the reporting required under its Terms of Reference controlled through the use of a standing items schedule, including assurance functions reporting.

The AHEL Board delegates the governance of its subsidiaries to the Boards of AEL, AIG Life, AIG Israel and its two other non-insurance entities, Laya Group and AIG Advisors SRL. This system of governance model avoids duplicative and disproportionate reviews at the AHEL Board level and is both adequate and appropriate for the level of complexity of the role of a holding company. The underlying insurance subsidiaries have appropriate and adequate governance structures including properly constituted sub committees in compliance with local laws and regulation.

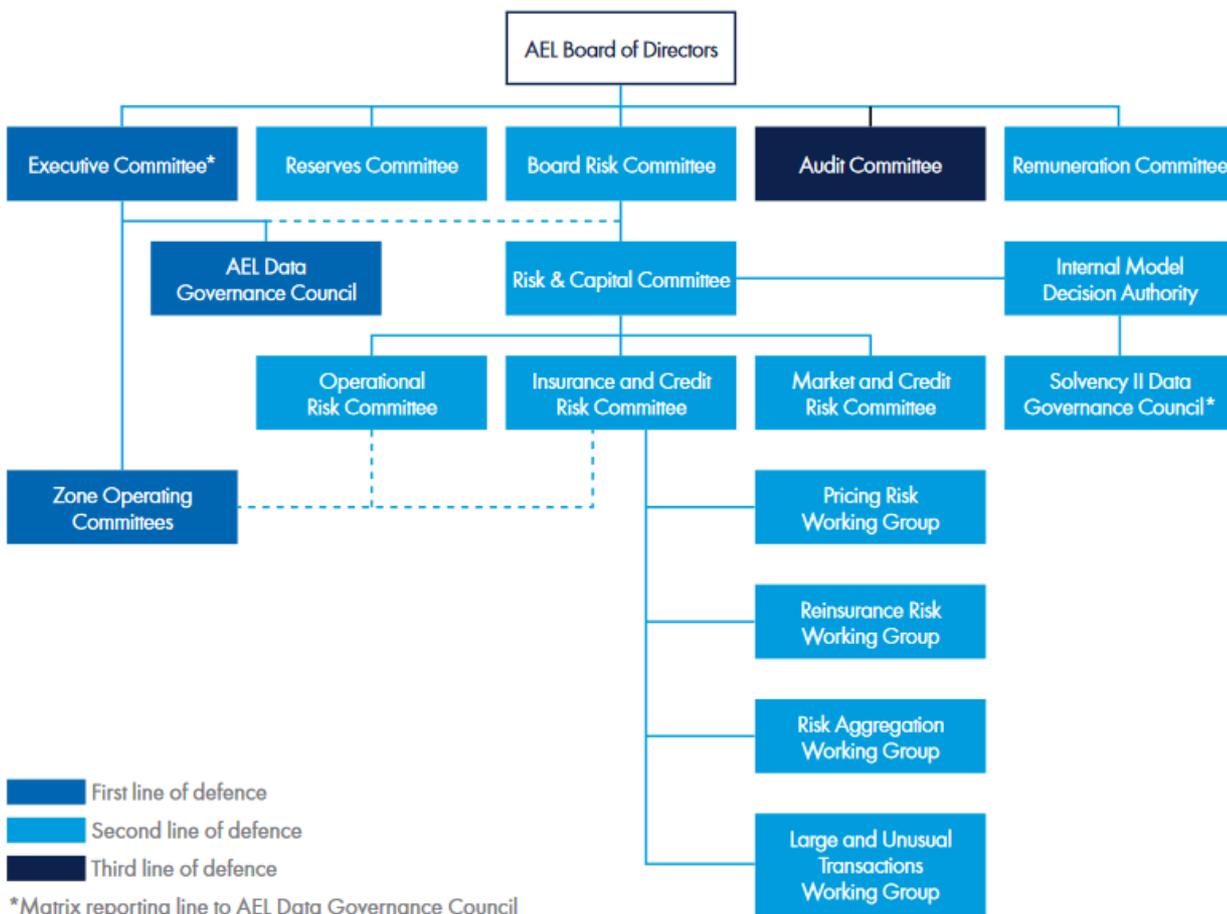
AEL, AIG Life and AIG Israel are regulated and have properly constituted unitary boards, appropriately structured committees and executive management teams. They also have specific personnel dedicated to the ‘control functions’ (Compliance, Risk and Audit).

The core documentation, which supports the allocation of responsibilities, is as follows:

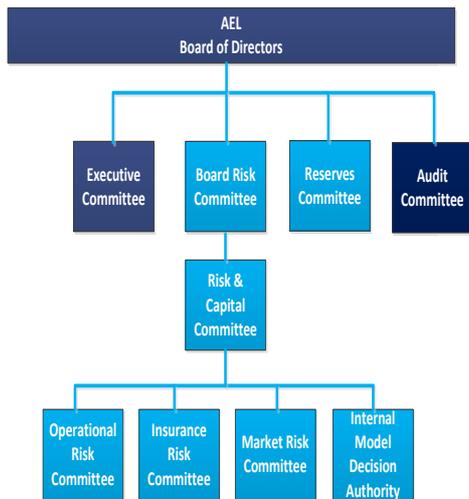
- 1) AHEL Group Governance Policy;
- 2) AIG Europe Limited Governance Playbook;
- 3) Governance Maps for AIG Life and AEL;
- 4) SIMR documentation including Fit and Proper Policy for AIG Life and AEL;
- 5) Structure charts (updated each quarter);
- 6) Documented roles and responsibilities for all members of the Executive Committee (‘ExCo’), the Board and the controlled functions (held by Company Secretariat);

Similar governance structures are in place for AIG Israel, appropriate to its size and complexity. As of 30<sup>th</sup> November 2018 American International Group UK Limited had only a Board in place as the Part VII Transfer hadn’t been executed yet.

**AIG Europe Limited Governance Structure**



**Overview of Management and Governance Structure in AEL**



The AEL Board has overall responsibility for the oversight of the management of AEL. Its role is to provide entrepreneurial leadership of AEL within a framework of prudent and effective controls which enables each of the risks faced by AEL to be assessed and managed. All authority in AEL flows from the Board, which in turn delegates the authority to sub-committees as set out in their respective terms of reference.

The role of the Board Risk Committee (BRC) is to challenge, oversee and monitor the management of risks within AEL to ensure they are being managed within the risk governance requirements and risk appetite approved by the Board.

The Reserves Committee is responsible to ensure that AEL maintains reasonable and adequate technical reserves and to oversee and manage all forms of reserving risk assumed or accepted by AEL.

The Risk and Capital Committee (RCC) is authorised by the BRC and by the ExCo to manage the risk profile of AEL within the risk governance framework and risk appetite approved by its Board of Directors. The RCC has sub-committees, (each chaired by a member of ExCo) covering Insurance, Market and Operational Risk, to manage risk profile in each of these areas at a more granular level. Other members include relevant European business heads, risk experts from ERM and actuarial expertise from the Internal Model team.

AEL’s risk management framework is itself supported by and delivered through a set of processes, which aid the identification, measurement, monitoring, management and reporting of risks. These processes and deliverables include the Risk Register, Risk Appetite Framework, Internal Model Output (for risk analytics), Stress and Scenario Testing and Risk Indicator Reporting. The outputs of these risk processes are fundamental to the delivery of the Own Risk and Solvency Assessment (ORSA) and, ultimately, the yearly ORSA reports.

The delivery of the risk management framework is reviewed and challenged within the risk governance structure, which is made up of a series of cascaded Risk Committees. The outputs of the risk management processes mentioned above are escalated through the committee structure with each ORSA report and its underlying components reviewed and challenged at each level and ultimately owned and signed off by the Board.

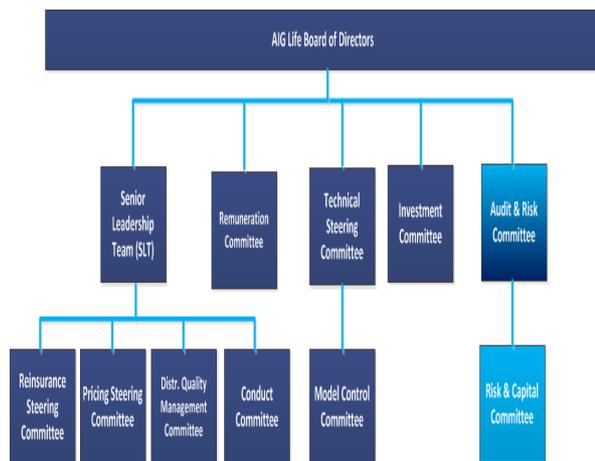
The Internal Audit function delivers the “Third Line of Defence” by providing independent assurance to the AEL Board, through the Audit Committee, regarding the effectiveness of the First and Second Lines of Defence.

The full description of AEL’s Management and Governance Structure and its Key Functions, Roles and Responsibilities is found in Section B.1A on pages 17-25 of AEL’s 2016 SFCR. The AEL 2016 SFCR is available for download and viewing from the AIG website at <https://www.aig.co.uk/about-aig>.

**Overview of Management and Governance Structure in AIG UK**

As at YE 2018 AIG UK had only a Board in place. The full governance for AIG UK mirrors AEL’s and has been in place from 1<sup>st</sup> December 2018.

**Overview of Management and Governance Structure in AIG Life**



The role of the AIG Life Board is to exercise effective control and oversight over its business in accordance with legislative and regulatory requirements. The purpose of the Senior Leadership Committee (SLC) is to develop the AIG Life strategy (for example through the annual business and capital plans), and following Board approval implement it and effectively manage the business of the Company, ensuring its direction and performance is aligned to AIG Life’s Business objectives and those of the Group whilst ensuring that it is managed in accordance with regulatory and legislative requirements, that all actions agreed with the Board are delivered to agreed standards and timescales, and that any actions from the agreed plans are proactively managed.

The SLT is composed of the CEO and senior management and is responsible for maintaining an oversight of the various strategic initiatives. The SLT reports directly to AIG Life Board.

The Investment Committee is responsible for overseeing the performance of the assets held by AIG Life, identifying, developing and recommending appropriate investment strategies to the AIG Life Board based on the needs of the business.

The Remuneration Committee oversees the remuneration arrangements. The committee considers and advises the AIG Life Board in relation to the remuneration of management specifically ensuring avoidance of incentive programmes that encourage employees to take unnecessary risk.

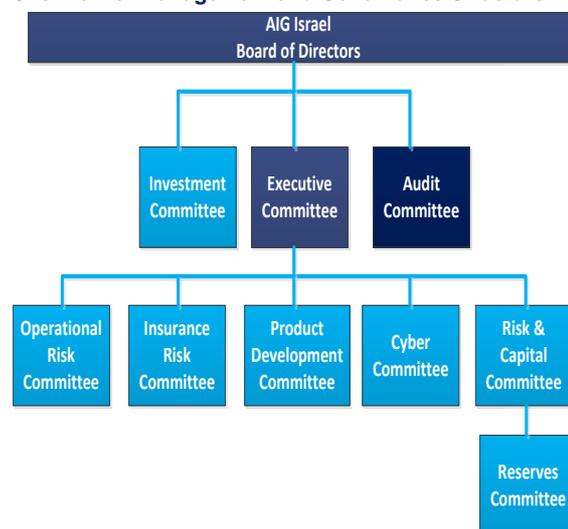
The Risk & Capital Committee oversees the risk management processes of AIG Life, ensuring that all risks are formally evaluated and categorised, that plans for the management of such risks are effective, and that the AIG Life Board and Audit Committee are informed of the results of this analysis and monitoring work. The Risk & Capital Committee reviews and approves the suite of AIG Life Risk Policies with a small number of core risk management policies requiring subsequent Board approval. The Risk & Capital Committee has oversight of model development and changes, data quality and governance and the overall risk and control environment.

Solvency capital reporting and adherence to risk appetite is provided to the Risk Committee for review prior to submission to the Audit Committee and Board. The Risk Committee also has responsibility for reviewing the AIG Life ORSA prior to submission to the Board for approval, on an annual basis or more often if appropriate.

The Audit Committee reports directly to the Board highlighting material issues which the Committee considers should be escalated for the Board's attention or action. In addition, documents such as the annual accounts must be reviewed by the Audit Committee prior to being put before the Board.

The full description of AIG's Life Management and Governance Structure and its Key Functions, Roles and Responsibilities is found in Section B. System of Governance on pages 14–31 of AIG's Life YE 2018 SFCR. The AIG Life YE 2018 SFCR is available for download and viewing from the AIG website at <https://www.aig.co.uk/about-aig>.

### Overview of Management and Governance Structure in AIG Israel



AIG Israel has a strong risk culture articulated by effective ERM and embodied by management at all levels through the governance structure and risk management processes. The Board has the ultimate responsibility for development and oversight of the risk management framework and delegates the management of risks to the Board's Investment Committee and to the Executive Committee (Ex-Co).

As required by the local regulation, there are two Board committees: Audit Committee and Investment Committee. The Board Committee and Investment Committee convene on a monthly basis. The Audit Committee, through its Internal Audit function provides independent assurance to the Board, through the Audit Committee, regarding the effectiveness of the First and Second Lines of Defence. The Audit Committee convenes a minimum of 6 meetings a year.

ERM provides its insight and risk reports to these committees and specifically to the Investment Committee, as required by regulation and the Investment Committee's Terms of Reference.

In addition to the Board committees, there are five management committees as detailed below:

- **Risk & Capital Committee (RCC)** convenes at least quarterly, chaired by the General Manager. The Committee's Terms of Reference (TOR) is to make recommendations to the Board as to the Company's overall risk management framework, including risk appetite; Solvency II; reinsurance exposure policy; and other capital management issues.
- **Insurance Risk Committee (IRC)** convenes at least quarterly, chaired by the CRO. The Committee is responsible for assessing, managing, monitoring and reporting on the insurance risk of the company, ensuring the company operates within its insurance risk appetite, reviewing reinsurance changes, approving price changes, and reviewing key underlining assumptions used in the pricing models.
- **Product Development Committee (PDC)** convenes at least 6 times a year and chaired by the Life and A&H Consumer Product Manager. The Committee is responsible for establishing and maintaining a framework that assures all products are developed and approved using a disciplined and consistent process before they are offered and that takes into account: (1) customer needs; (2) legal and regulatory requirements; (3) AIG policies; and (4) internal business strategies.
- **Operational Risk Committee (ORC)** convenes quarterly, chaired by the CRO, and includes representatives from different business units. The ORC monitors current and emerging operational risks, mitigating actions and related decisions. The Committee's TOR is to overview the operational risk framework; to promote the operational risk agenda and initiatives; to oversee, monitor, and discuss recommendations to mitigate operational risks; and to implement a procedure for risk events analysis.
- **Reserves Committee (RC)** was set up in 2016 and convenes at least annually, chaired by the GM. The Committee's TOR is to ensure that the Company maintains reasonable and adequate technical reserves, to challenge the reserves (including Unearned Premium Reserves, Incurred But Not Enough Reported (IBNER), Incurred But Not Reported (IBNR), Unallocated Loss Adjustment Expenses (ULAE) and ad-hoc reserves) within the range of actuarial reasonable best estimates and stat reserves provided, in line with the Company's reserving policy.
- **Cyber Committee (CC)** was set up in 2018 and is chaired by the Chief Information Officer. Its membership includes the Information Security officer and the CRO. The Committee is responsible for managing, monitoring and reporting on all the Company's cyber aspects, reviewing the cyber working plan, discussing the risk assessment results and remediation plan. The Committee reports to the Board of Directors at least annually on its activities, conclusions and recommendations.

### EUROPEAN GROUP - THE "THREE LINES OF DEFENCE" MODEL

The AIG Europe Limited risk management framework is based on the "Three Lines of Defence" model. This structure allows for each function and individual to have a clear understanding of their risk management responsibilities and aids embedding an effective risk culture across the Group.

### Overview of Management and Governance in AIG Europe Limited

#### Board of Directors

The Board has overall responsibility for the oversight of the management of the Company. Its role is to provide entrepreneurial leadership of the Company within a framework of prudent and effective controls which enables each of the risks faced by the Company to be assessed and managed. The Board is responsible for promoting the long-term success of the Company whilst securing an appropriate degree of protection for policyholders. Its objectives are to set the Company's strategic aims, monitor management's performance against those strategic aims, set the Company's risk appetite, ensure the Company is adequately resourced and that

effective controls are in place. All authority in the Company flows from the Board, but it delegates to sub-committees the matters set out in their respective terms of reference.

The Board is composed of a mix of Executive Directors, Independent Non-Executive Directors and a Group Non-Executive Director, so as to achieve a balance of skills, experience, challenge and debate and so that no individual or small group of individuals can dominate its decision-making. Any major changes to the Company's business activities must receive Board approval prior to implementation.

### B.1.A.A FIRST LINE OF DEFENCE

Senior management (executive/business/ operational), along with all staff in the organisation are responsible for implementing and maintaining the controls necessary for achievement of the Company's strategic and business objectives, the ownership and management of its inherent risks, its compliance with corporate standards and its legal and regulatory obligations. In this context, senior management are risk-takers and hence form the "First Line of Defence" against failure.

#### The Executive Committee

The Executive Committee (ExCo) has responsibility for developing and implementing strategy for and managing operational issues relating to, the insurance companies designated as part of the Company, UK and Europe region.

It is responsible to the Board for the day-to-day management of the Company and oversight of management of the other legal entities in the region. It develops strategy (for example, through annual business and capital plans), proposes the strategy to the Board, and once approved, implements it as an executive body, ExCo forms part of the first line of defence.

The ExCo is composed of the CEO and a mix of senior executives. The independent non-executive directors of Company may interview proposed candidates for positions prior to their appointment.

The ExCo receives reports from each core business unit to enable it to monitor progress against the strategic plan, and where applicable develop and propose material adjustments to the Board. It also maintains an oversight of transformation projects and other strategic initiatives.

The ExCo reports into the Board via the CEO report and achieves co-ordination with wider Group strategy via the reporting lines of its individual members.

#### Zone Operating Committee

The Zone Operating Committee (OpCo) has responsibility for managing the business of the Zone within the limits of the mandate delegated to it by the ExCo. This includes implementing the strategy for the Zone agreed with the ExCo, monitoring and reporting of financial and operating performance, management and control of risk and overseeing compliance with applicable regulations. As an executive body, Zone OpCo forms part of the first line of defence

#### Data Governance Council

The role of the European Data Governance Council (EDGC) includes:

- Continuously improve data quality and reliability and access to information, within the context of a sustainable and cost-effective data management infrastructure; and
- Ensure that the region effectively manages its data in accordance with all applicable data management policies and standards.

Business and Solvency II requirements are currently the main drivers for data governance and data quality management in AEL with particular focus on data used in SCR calculation using both Internal Model and Standard Formula.

The European Data Governance Council and its sub-committees: Solvency II Data Governance Council and Data Quality Working Group provide direction and oversight for all data management activities and forum for data quality reporting and issue escalation.

The Data Management Team is responsible for implementation of AIG Europe Data Policy, Data Governance Standards and Data Quality Standards. They maintain end to end data flow documentation covering the main functions and business processes involved in production of data used in technical provisions, internal model and standard formula capital requirements calculation. The team performs regular data quality assessments and data quality risk and control assessments and manages remediation of identified issues.

The SII DGC is principally comprised of specialists representing different data segments, while the EDGC is comprised mainly of more senior departmental heads. There is some common membership between the two bodies and between the EDGC and the ExCo, including the Chief Data Officer.

The EDGC reports to the ExCo on a monthly basis via a reporting hydra. The SII DGC has a dual reporting line: (1) into the Internal Model Decision Authority, which in turn reports its activities to the Risk and Capital Committee (RCC), and (2) to the EDGC, so as to ensure compliance of any capital modelling-related data strategies with the regional data strategy and methodology. It provides each body with a report of its proceedings, including its data quality assessment report.

### B.1.A.B SECOND LINE OF DEFENCE

The oversight functions are responsible for defining the risk framework and for monitoring the effectiveness of risk controls and for reporting their weaknesses or failures to the relevant risk committees. In this context, these functions are the "Second Line of Defence" against failure.

Enterprise Risk Management (ERM) also partners with the business in providing advice, guidance and challenge in managing their risks.

#### Board Risk Committee

The role of the Board Risk Committee (BRC) is to challenge, oversee and monitor the management of risks within the Company to ensure they are being managed within the risk governance requirements and risk appetite approved by the Board. The BRC is part of the second line of defence.

The BRC is composed of each of the Independent Non-Executive Directors plus the CEO. Its standing attendees include the Chief Risk Officer and General Counsel. The BRC reviews the business plan to ensure that risks to the business plan and the capital implications are adequately identified and assessed as part of the business planning process and that appropriate mitigating actions are in place.

The chairman of the BRC reports to the Board on key discussions and actions of the BRC. As with all other Board sub-committees, copies of its minutes are made available to the Board. Where the BRC asks for further information or for particular issues to be addressed and reported on, the Enterprise Risk Management (ERM) function is responsible for capturing a list of action points and ensuring that these are reported back on in full at the subsequent and following BRC meetings until the action point is closed. The RCC is the body which bears primary responsibility for ensuring that the BRC's instructions are carried out.

#### Reserves Committee

The role of the Reserves Committee is to ensure that the Company maintains reasonable and adequate technical reserves and to oversee and manage all forms of reserving risk assumed or accepted by the Company. The Reserves Committee is part of the second line of defence. The Reserves Committee is composed of four Independent Non-Executive Directors, the Chief Risk Officer, CFO, Chief Actuary, Head of Claims, Heads of Consumer and one of the four key Commercial product tower Heads. The CEO, General Counsel, AIG P&C/International Chief Actuary, profit centre Actuarial Heads, Consumer Lines Actuary, one of the four Commercial Lines Actuaries, Head of Insurance Risk and Internal Audit are standing invitees. The Reserves Committee reports to the Board via a summary report that highlights material issues which the Committee considers should be escalated for the Board's attention or action.

#### Risk and Capital Committee

The Risk and Capital Committee (RCC) is authorised by the BRC and by the ExCo to manage the risk profile of the Company within the risk governance framework and risk appetite approved by its Board of Directors.

This risk management framework is itself supported by and delivered through a set of processes, which aid the identification, measurement, monitoring, management and reporting of risks. These processes and deliverables include the Risk Register, Risk Appetite Framework, Internal Model Output (for risk analytics), Stress and Scenario Testing and Risk Indicator Reporting. The outputs of these risk processes are fundamental to the delivery of the Own Risk and Solvency Assessment (ORSA) and, ultimately, the half-yearly ORSA reports.

The delivery of the risk management framework is reviewed and challenged within the risk governance structure, which is made up of a series of cascaded Risk Committees. The outputs of the risk management processes mentioned above are escalated through the committee structure with each ORSA report and its underlying components reviewed and challenged at each level and ultimately owned and signed off by the Board.

The RCC has sub-committees, (each chaired by a member of ExCo) covering Insurance, Market and Operational risk, to manage risk

profile in each of these areas at a more granular level. Other members include relevant European business heads, risk experts from ERM and actuarial expertise from the Internal Model team.

The Insurance Risk Committee in itself has four Sub-Groups that focus on particular aspects of Insurance Risk and report to the Insurance Risk Committee on any recommendations and findings undertaken as a result of the execution of their responsibilities.

The responsibilities of each committee are as follows:

- **Pricing Sub-Group:** To ensure underwriting adherence to technical pricing, to drive improvements in rating strength and pricing integrity and to monitor and analyse the Company's pricing risk profile;
- **Reinsurance Sub-Group:** To set the reinsurance strategy and to determine reinsurance treaty structures;
- **Risk Aggregation Sub-Group:** The aggregation and analysis of risk accumulation of key perils; and
- **Large and Unusual Transaction (LUT) Sub-Group:** To consider transactions that meet or exceed set trigger levels in relation to the Company's risk profile before the Company becomes committed. The LUT is an ad-hoc meeting of the RCC.

The Market Risk Committee meets at least four times a year and any such time as required to focus on the entire balance sheet of the Company by monitoring and managing the Market Risk, Investment Risk, Counterparty Credit Risk and Liquidity Risk profile of the Company. The responsibilities of the committee are as follows:

- To monitor the overall Market risk (including investments credit) profile against the Board approved risk appetite;
- To propose and approve an appropriate Market Risk Policy and Liquidity Policy. Ensure, through monthly or more frequent reviews, that such policies are kept up to date and relevant within the context of regulatory, economic and company specific business developments;
- To review and approve Market Risk, Counterparty Credit, Liquidity and Investment limits and/ or guidelines within any parameters defined by the Board approved risk appetite;
- To assess the effectiveness of systems established by management to identify, assess and manage the Risks;
- To monitor capital adequacy and liquidity to ensure that Treasury can satisfy planned and agreed future requirements of the business;
- To review and approve the annual Investment Plan prepared by the Company's Investment Managers
- To monitor the performance of the investment portfolio against the investment plan and wider market developments;
- To review and analyse the Risk MI and recommend any necessary changes to the RCC; and
- To periodically review and update the market risks on the AEL risk register and review the effectiveness of controls. To implement additional controls where required to ensure the company remains within risk appetite and meeting all legal and compliance obligations.

The RCC also delegates responsibility to the Internal Model Decision Authority and the EDGC to cover specific aspects of the Company's risk management that is concerned with the effective operation and utilisation of the internal model.

Finally, oversight responsibility over profit centres' adherence to product development controls and processes is delegated to the Product Development Forum thus helping to ensure any conduct risk associated with the development and launch of new products is appropriately managed. ERM is also represented in this forum.

The RCC fulfils its duty to oversee the internal model via the Internal Model Decision Authority, which reports into it on a quarterly basis. The RCC is deliberately designed to be a second line of defence

### **B.1.A.C THIRD LINE OF DEFENCE**

The Internal Audit function delivers the "Third Line of Defence" by providing independent assurance to the Board, through the Audit Committee, regarding the effectiveness of the First and Second Lines of Defence.

#### **Audit Committee**

The role of the Audit Committee includes:

- Assisting the Board in discharging its responsibilities for the integrity of the Company's financial statements;
- Providing independent and objective assurance and oversight of the effectiveness of the systems of internal controls (financial, operational, compliance and risk management), including those systems and controls reviewed by Internal Audit;
- Providing oversight of the qualifications, independence and performance of External Audit; and
- Monitoring the Company's compliance with legal and regulatory requirements.
- Approves Solvency II policies, quarterly and annual returns prior to being approved by the Board.

The Audit Committee is part of the third line of defence. The Audit Committee is composed of all the Independent Non-Executive Directors. The Chief Financial Officer (CFO), General Counsel, the Chief Risk Officer (CRO), the Head of Internal Audit and the lead partner of the External auditors are standing invitees.

The Committee reports directly to the Board using a narrative report that highlights material issues which the Committee considers should be escalated for the Board's attention or action. In addition, documents such as the annual accounts must be reviewed by the Audit Committee prior to being put before the Board.

#### **Internal Audit**

Internal audit forms the third line of defence. An independent internal audit function will, through a risk-based approach to its work, provides assurance to the Board and senior management. This assurance will cover how effectively the Company assesses and manages its risks and will include assurance on the effectiveness of the first and second lines of defence. It encompasses all elements of the risk management framework (from risk identification, risk assessment and response, to communication of risk related information) and all categories of the Company's objectives: strategic, ethical, operational, reporting and compliance.

### **B.9 ADEQUACY AND APPROPRIATENESS OF THE SYSTEM OF GOVERNANCE**

As mentioned above, the AHEL Board delegates the governance of its subsidiaries to the Boards of AEL, AIG Life, AIG Israel and its two other non-insurance entities, Laya Group and AIG Advisors SRL. The simplified governance structure has been designed to ensure that management are able to provide the appropriate levels of oversight whilst allowing decisions to be made more quickly and ensuring that the employees of each subsidiary are empowered to make decisions at the right levels.

Each insurance subsidiary continues to align its management and governance structure to proactively respond to the business and regulatory needs.

The various Board-level committees of each subsidiary have clearly defined responsibilities which have been delegated by their Boards. These committees are in turn supported by the relevant working groups, forums and sub-committees whose members and attendees have specific experience and expertise, allowing them to provide more detailed review and oversight. These bodies are empowered to make decisions and take actions within the limits of their delegated authority, thereby allowing each subsidiary, and consequently the European Group, to adapt to changes in an agile and flexible manner.

The governance structure therefore provides a mechanism for the European Group to anticipate and respond to potential changes in the business environment or risk profile within an appropriate period of time. The governance structure is also designed to facilitate the formulation, scrutiny and once approved, implementation of strategy. As a member of a wider group, the broad strategic direction of the European Group as a whole is set by AIG, Inc.'s executive operating committee. The ExCo formulates a detailed strategy for the European Group in the form of the annual business plan, taking account of AIG Group strategic direction. The plan is presented to the Board who scrutinise it to assess its benefits and risks to determine whether its implementation would be in accordance with:

- The European Group's risk appetite;
- The European Group's short-term and longer-term strategy and business plan;
- The European Group's legal and regulatory duties in each jurisdiction;
- The fair treatment of those who are (or may become) the policyholders of its insurance subsidiaries; and
- The safety and soundness of the European Group.

The AHEL Board's terms of reference give it overall responsibility for setting the European Group's strategy and it will not approve any strategy that, its opinion, does not meet the above criteria.

body, but composed of members who are also in a position to take immediate executive action to address risk issues. The RCC is comprised of a core membership of designated ExCo members. Other ExCo members may attend where an agenda item touches on their subject-matter expertise.

Any matter due to go to the BRC should first receive RCC review. The chair of the RCC produces a narrative report for the BRC (copied to the Company ExCo) on key issues arising in RCC meetings which the committee considers materially significant. Where the RCC identifies an action or requires further information in relation to a risk, it gives instructions to the relevant committee member and tracks the progress of the required steps through an actions list.

### B.1.A.D Key functions, roles and responsibilities for the European Group

Persons who effectively run the Company or have other key functions are required to meet the fit and proper requirements. The system of governance includes the finance function, the risk management function, compliance function, actuarial function and internal audit function. The roles and responsibilities for each of these functions and their key function holders are set out in turn below:

#### 1) Finance Function – Chief Financial Officer (CFO)

The Finance function is led by the CFO who is a member of the ExCo and is responsible for overseeing the leadership and transformation of regional controlling, capital management, reinsurance, taxation, corporate actuarial and treasury. The Finance controlling team is responsible for recording and organising the financial transactions generated by other departments. It has the following key responsibilities:

- External reporting for the Company and its subsidiaries including statutory accounts and Solvency II reporting;
- Business planning;
- Business partnering including management information;
- Tax;
- Capital management including reinsurance; and
- Rating agency relationships.

The Management of the Company is responsible for establishing and maintaining adequate internal controls over Solvency II reporting. The Company's internal controls over Solvency II is a process, under the supervision of the Board, designed to provide

#### 2) Risk Function – Chief Risk Officer (CRO)

The Company's ERM function oversees the delivery of the risk management framework. The function is led by the CRO who is a member of the ExCo. The team is split between a central team delivering entity-wide risk management and Zone Risk Officers present in each of the Company's major locations across the region. The Zone Risk Officers provide local risk expertise to the Company's branches. The ERM function implements the Company's Risk Management Framework (RMF) through a suite of "Risk Processes". The results and findings from these processes are reviewed, challenged and escalated through the Company's risk governance framework.

The ERM function supports the identification, measurement, management, monitoring and reporting of its major risk groupings, which include but are not limited to:

- Insurance Risk (including underwriting, reserving risk and catastrophe risk);
- Market Risk (including asset-liability management);

#### 3) Compliance Function – Chief Compliance Officer

The ECG is organised in accordance with the AIG Global Compliance Group (GCG) Structure. ECG consists of: the advisory group (which consists of the Chief Compliance Officer, Deputy Chief Compliance Officer and local compliance officers (LCO) within country); the Monitoring and Testing group (M&T); and the Financial Crime Group (FCG). Also the ECG works closely with the members of the GCG privacy team based in London.

##### Compliance function responsibilities

- Compliance Policies and Procedures: AIG's compliance policy issuance is governed by the AIG Policy Framework distributed by the AIG Policy Governance Unit. The Framework is designed to provide consistency across the Company in the development, implementation, monitoring, and maintenance for policies, which are documents that communicate the philosophy, rules and expectations of the Company. ECG, by input to GCG, reviews its policies, and any related procedures, periodically to determine whether updating is necessary to reflect changes in law or regulations. Compliance policies are maintained on the Compliance page of the AIG intranet as well as the AIG Policy Portal.
- Subject Matter Expertise: GCG possesses subject matter expertise with regard to the key Compliance Risks ("Key Compliance Risks"), which are evaluated as part of the Compliance risk assessment process, as well as via other means during the year. Although day-to-day management of these risks resides within the Business in order to assist

reasonable assurance that the SCR calculation is complete, accurate and is underpinned by an appropriate level of data governance.

The Company's internal control over Solvency II reporting includes procedures that:

- pertain to data inputs are complete, accurate and of appropriate quality to use in the SCR calculation;
- provide reasonable assurance on Solvency II reporting tool is producing expected results; and
- provide reasonable assurance regarding prevention or timely detection of errors & omissions that could have a material effect on the Solvency II reporting.

For the submissions done during the reporting period under consideration, checks have been performed to ensure the accuracy of data feeding into the SCR reporting by data quality team and detailed review by AIG Financial Control Unit (FCU) of quarterly and annual submissions including review of EUT controls.

- Liquidity Risk;
- Credit Risk (including risks associated with utilisation of reinsurance and other risk mitigation techniques);
- Operational Risk; and
- Business & Strategy Risk.

The ERM function supports all European operations within the Company region. A matrix reporting structure ensures a common approach to risk management throughout the Company and ensures that all relevant risks are identified, measured, managed, monitored and reported. ERM continues to work closely with management to improve the risk profile of the business and strengthen the RMF throughout Europe.

The 'Risk Management System' subsection B.3 of the report aims to provide an overview of the key risks encountered by the Company and the corresponding processes and procedures put in place for the management of these risks. The section also outlines the overall risk culture established within the Company.

businesses with the management of locally-required compliance risk issues, the FCG and privacy group also provides advisory guidance for these matters.

- Advisory Services: ECG provides guidance and advice on GCG various compliance risk-related matters in order to assist Business Segments and Corporate Functions as they assess opportunities, as well as address challenges, related to governance, performance and growth to facilitate strategies for execution.
- Compliance Risk Assessments: ECG participates in an annual global risk and control self-assessment ("RCSA") program to facilitate the identification, assessment, monitoring and measurement of operational risks.
- Compliance Testing: GCG has developed and maintains a function-wide testing program designed to verify that business operations comply with certain AIG and Business Segment policies and standards, as well as key laws and regulations. The testing program includes coverage of the Level 3

Compliance Risks that have been agreed upon with Operational Risk Management. The program is managed in EMEA by the M&T group who are responsible for the execution of the approved Test plan. Each Business Segment is responsible for a Monitoring Plan that is designed to enable management to determine where it might need to focus resources in order to improve processes, develop remediation plans to address control deficiencies, address emerging risks or implement key initiatives in order to meet business objectives.

- Compliance Training: Corporate Compliance is responsible for developing and implementing an annual global compliance training program addressing enterprise-wide key compliance topics, which is designed to enhance employee knowledge and understanding of compliance policies and procedures, laws, regulations and standards of good business conduct. Each Business Segment Compliance Unit is responsible for developing a training program tailored to Key Compliance Risks specific to Business Segments.

#### 4) Actuarial Function - Chief Actuary

The Actuarial function is led by the Chief Actuary. The Chief Actuary is part of the regional Executive Committee and works closely with other Executive members including the CEO, CFO, CRO, among others, and has a reporting line to the General Insurance Chief Actuary. The Actuarial function is responsible for calculating the probability and risk of future events using specialised mathematical techniques, software and commercial expertise. The Actuarial Function is a critical function for the Company, having a significant impact on the pricing, reserving and capital modelling calibration of all lines of business. The Actuarial function is a key contributor to the effective control management of Insurance Risks relating to the failure of pricing, risks relating to the failure of a product or strategy, and risks relating to adverse reserve development. The principal activities of the Actuarial Function are as follows:

- Portfolio/Account Pricing: The Actuarial Function provides advice and support in respect of understanding portfolio trends and related pricing decisions as well as individual account pricing for large complex policies across various countries. This support includes pricing profitability studies, individual account pricing, technical raters and Account Quality Index ('AQI').
- Strategic Pricing: Actuarial also develop structured raters to enable a more controlled environment in which accounts are priced whilst maintaining the ability for underwriting judgement within agreed parameters. Actuarial are heavily involved with the design and development of a strategic IT platform that acts as a well governed yet flexible front-end. It allows the Company to trade in such a way that risk data and exposure data is captured, allowing for a more robust premium rate management environment across the Company.
- Reserving: The Actuarial Function leads the analysis of historic data and recent trends in order to advise Senior Management on the appropriate levels of reserves to cover the expected cost of claims and highlights trends seen in historic claim movements. The level of reserves is AIG Europe's largest liability on its balance sheet; hence an accurate valuation of reserves is critical for the Company to run its business effectively. The Actuarial Function makes reserving recommendations to the Reserves Committee.
- Capital Modelling Calibration: Combining analytical skills, actuarial modelling software and business knowledge, the Actuarial Function plays a leading role in the increasingly important task of modelling of AIG Europe's Insurance Risk. IT supports the Internal Model review and challenge process as part of the Internal Model Decision Authority process. This element feeds into the ECM, which plays a wider role in determining the overall capital impact of changes to the Company's risk profile. Actuarial also helps calculate the Insurance Risk elements of the Standard Formula requirements for the Company which are in turn used as a benchmark to compare against the results of the Internal Model.
- Solvency II Technical Provisions: In compliance with the European Union Solvency II legislation, the Actuarial Function calculates both the best estimate technical provisions and the risk margin which forms the market value of the Company's technical provisions. These calculations are performed based on the latest draft regulations and in conjunction with the ECM team, ensuring consistency with the Internal Model.
- Planning: The Actuarial Function develops a best estimate view of the loss ratio for the budget year; this takes into account information such as expected change in business mix, expected future premium rates, expected future claims inflation and expected changes to terms and conditions as well as considering the historical loss ratio trends by segment. This is then discussed with the wider business.
- Overseeing the preparation and submission of the Actuarial function report to the Board which sets out the assessment of the reliability and adequacy of the calculation of technical provisions and an opinion on the underwriting policy and overall reinsurance arrangements;
- Timely provision of actuarial inputs into Solvency II Pillar 3 reporting;
- Owning the risks identified in the European risk register;
- Peer review of pricing profitability studies; and
- Production of management information around profitability as required by the wider business.

## 5) Internal Audit Function – Head of Internal Audit

The Board, senior management, Internal Audit, other second line functions, business managers and all colleagues have a shared commitment to maintain and enhance the integrity of the Company's control environment. Within the context of the control framework, Internal Audit is an independent risk assessment function established within the organisation to evaluate, test, and report on the adequacy and effectiveness of management's systems of internal control, providing third line of defence.

The purpose of these evaluations and tests is to:

- Assist the Audit Committee in executing their oversight responsibilities and,
- Provides an independent assessment of the Company's system of internal control, through reviewing how effectively key risks are being managed, and assists management in the effective discharge of its responsibilities by carrying out independent appraisals and making recommendations for improvement.

Internal Audit is responsible for establishing, implementing risk based and maintaining an effective and efficient audit programme, taking into account the Company's activities, system of governance and risk management processes. The Internal Audit function is led by the Head of Internal Audit.

The Head of Internal Audit is responsible for developing and maintaining a risk based and an efficient and effective programme of internal auditing through:

- Delivering a comprehensive, dynamic and globally-aligned audit programme for the Company and, more specifically, the Company;
- Evaluating the control framework with respect to the reliability, integrity and timeliness of financial information and statements and key non-financial data;
- Evaluating the processes and controls established to ensure compliance with corporate ethical standards, policies, plans, procedures and with applicable laws and regulations;
- Evaluating change activities such as significant projects and large scale business initiatives during the life or term of those projects and initiatives for the purpose of identifying possible unmitigated risks and highlighting other project management issues;
- Monitoring and evaluating the effectiveness of the Company's risk management processes;
- Reporting periodically on Internal Audit's purpose, authority, responsibility and performance relative to its plan and organisational objectives;
- Coordinating with risk management and other control functions to facilitate the implementation of an effective and efficient system of internal control;
- Managing the global delivery and relationship management for the ExCo;
- Supporting the assurance needs of the Board and the Audit Committee by developing tailored planning, reporting and advice to meet local corporate governance and regulatory requirements; and
- Managing the requirements of the regions' regulators and taking on the approved person's role in respect of the Company.

### Maintaining audit independence

The Head of Internal Audit reports on the audit program, its status, and the condition of the control environment directly to the Board through the Audit Committee. This reporting relationship which also includes audit plans, financial budgets and staffing considerations is designed to ensure the ongoing independence of the internal audit function in order to provide for the objectivity of its findings, recommendations and opinions.

The Head of Internal Audit is authorised by the Audit Committee to have full and complete access to any of the organisation's records, properties and personnel.

The Head of Internal Audit is also authorized to designate members of the audit staff to have such full and complete access in the discharging of their responsibilities.

Consistent with generally accepted professional internal auditing standards relating to independence, objectivity and authority, internal auditors are not to engage in developing or installing procedures or preparing records, or in any other activity which would normally be the subject of audits. Internal auditors are not to have direct responsibility or any authority over any of the activities or operations that they review. Internal auditors will assist management in maintaining adequate and effective systems of controls through objective appraisals, recommendations and control consultations.

## B.1.B MATERIAL CHANGES IN THE SYSTEM OF GOVERNANCE DURING THE PERIOD

There were no material changes during 2018 in the Company's System of Governance.

## B.1.C REMUNERATION COMMITTEE

The AIG Group compensation programme is structured so as to make enterprise-wide compensation decisions consistent with the Company's compensation philosophy.

### Principles of the remuneration policy

The guiding principles that form the foundation of the compensation philosophy and strategy are:

- Provide a market-competitive, performance-driven Total Direct Compensation (TDC) structure (i.e. TDC, which consists of base salary plus annual incentive plus long-term incentive);
- Variable incentive compensation will be used to reward annual and long-term risk-adjusted performance and to provide exceptional pay opportunities for top performers at all levels within the Company;
- Weight TDC opportunities toward variable incentive compensation (both annual and long-term), which will increase as a percentage of total compensation at higher grade levels, while making sure that all variable incentive elements appropriately balance risk and reward; and
- Use performance measures to drive high-performance business results compared to relevant benchmarks and to achieve sustainable increases in the "intrinsic value" of the firm.

Annual and long-term incentives paid to current and former executive officers are subject to recovery if it is determined they have been based on financial statements that were restated due to material noncompliance with any financial reporting requirement under the securities laws within three years prior to payment or if the Compensation and Management Resources Committee (CMRC), in its discretion, determines that such incentives were based on erroneous data to a degree that it deems material.

### Human Resources

The Human Resources (HR) team is responsible for the following aspects of the business: Business Partnership, Talent Management, Talent Acquisition, HR Operations, Compensation and Benefits and Payroll.

The HR team is a key control for Operational Risks relating to employment legislation and people related risks, such as a lack of appropriately skilled resourcing, which covers aspects of the Company's Operational Risks relating to Employment Practices.

This is managed by a combination of ensuring remuneration and staff benefit packages are competitive, appropriate talent, development and succession frameworks are in place to enable ongoing development and long term prospects for employees and effective recruitment practises are maintained to attract new skills to the business. Global Job Grading is a global initiative that is operated to ensure that the process of remuneration and career progression within the company is transparent and encourages the right skills and behaviours amongst staff.

### Compensation

The total Direct Compensation consists of the following elements:

Direct compensation	Fixed/variable
Base salary	Fixed
Short-term incentives	Variable
Long-term incentives	Variable
Benefits and perquisites	Fixed/variable

### Performance criteria

To ensure fair, compelling, competitive and consistent compensation opportunities throughout the firm, employees are assigned to pay grades based on their job responsibilities (internal equity) and compensation is administered under a structure that is anchored on competitive market data (external equity).

Each pay grade has a salary range and ranges for target annual incentives and long-term incentives; these grades and ranges will be designed to reflect that the Company competes in multiple markets and geographies, and that a "one size fits all" approach will not meet the needs of its various Business Units.

The Company values differentiated incentive compensation. Managers have discretion in determining short term incentives, so long as they stay within short term incentive pools and differentiate individual performance. Decision aids are provided on how to make the compensation determination and manager toolkits are provided with advice on ways to recognize top performance and have better, continuous performance conversations with employees.

Additionally, HR actively supports effective performance management by recruiting, training, coaching and developing effective managers to maintain good performance. HR coordinate tools to assist in this process such as the Annual Performance Review Process which validates the performance of individuals against their goals and their behaviours.

The HR team also plays a key role in ensuring that the Company remains compliant with relevant employment legislation and is largely managed by the enforcement of core policies including the Code of Conduct, Disciplinary and Grievance Procedures and the Equal Opportunities Policy.

Additionally, HR is responsible for ensuring that employees are paid appropriately within the local tax laws. They ensure that the relevant payments are made to the government authorities on time and also make appropriate contributions to pension funds.

Under the Company's long term incentives plan, a significant portion of executives' compensation is provided in equity, based on performance metrics over a three-year period and subject to a vesting period. This promotes long-term value creation for the Company's shareholders and appropriately accounts for the time horizon of risks.

### Risk and Compensation Plans

The Company remains committed to continually evaluating and enhancing our risk management control environment, risk management processes and enterprise risk management functions, including through enhancements to its risk governance framework. The Company's compensation practices are integral parts of its approach to risk management, and the Committee regularly monitors the Company's compensation programs to ensure they align with sound risk management principles.

## B.1.D MATERIAL TRANSACTIONS DURING THE PERIOD

There were no material transactions during the reporting period between the Company and AIG Holdings Europe Limited, the Board members and members of the administrative, management or supervisory body.

## B.2 FIT AND PROPER

The 'Fit and Proper' subsection of the report aims to provide a description of the Company's processes for assessing the fitness and propriety for persons who effectively run the Company or have other key functions.

### Assessment of fit and proper

Persons who effectively run the Company or have other key functions are required to meet the fit and proper requirements. The Company has established fit and proper policies and processes which comply with the current Approved Persons regime. The process comprises of two stages:

#### 1. PRE-APPOINTMENT

- **References** - The Company takes reasonable steps to obtain appropriate references from the person's previous employer(s) CRB checks: Following receipt of the person's consent the Company obtains and assesses any disclosures contained within a UK criminal records bureau check (or overseas equivalent if applicable);
- **Credit checks** - As an additional means to the person's financial soundness, the Company carries out a credit records check through a recognised agency;
- **Other due diligence from publicly available sources** - This includes such other due diligence as may be appropriate in order to form an assessment of the person's fitness and propriety, including from publicly available sources such as the Financial Services Register and Companies House (in relation to testing the accuracy of declarations around directorships);
- **Pre-appointment questionnaire** against which the findings of the above can be cross-checked;
- **Qualifications** - Request and review evidence of relevant qualifications as appropriate; and
- **Application** - Require a formal application with CV (containing the candidate's full employment history accounting for any gaps, and the reasons for leaving each employer) and ensure that the person is interviewed at an appropriate level in order to assess his or her competence, knowledge, experience and training (including the person's training needs and requirements), taking into account the duties that will be expected of that person as set out in the role profile for the position.

#### Senior Insurance Managers' Regime

The Senior Insurance Managers' Regime (SIMR) came into force on 7 March 2016 and replaced the Approved Persons regime. The regime applies to the most senior executive management and directors who are subject to regulatory approval. Under section 59 of the Financial Services and Markets Act 2000 (FSMA), authorised firms are required to ensure that individuals seeking to perform one or more of the PRA-designated Senior Management Functions seek PRA approval prior to taking up their position.

#### 2. ONGOING POST-APPOINTMENT

The Company gathers the information it has collected as part of the recruitment process on the person's skills gaps and where appropriate develops a learning and development plan and induction programme.

The assessment for the pre-appointment stage is carried out by the Human Resources department and the person's proposed manager in the Company. In this case, the assessment will take account of the qualifications, knowledge and experience already existing within these bodies in order to ensure an appropriate diversity of these attributes among management. Where the appointment is to a Board or ExCo level position, the proposed appointee is also interviewed by one or more Non-Executive Directors.

The ongoing assessments of suitability are carried out through the annual review and appraisal process. Human Resources, working with Compliance, will provide Approved Persons with an annual training programme of legal and regulatory briefings.

Retrospective criminal checks are carried out on existing Approved Persons who have not been previously subjected to a criminal records check.

#### Training of the Board Members

The Company Secretary is responsible for identification and coordination of general training needs of the Board members. These may include general governance issues or technical matters. In addition individual Board members may identify further training needs.

## B.3 RISK MANAGEMENT SYSTEM

### AIG EUROPEAN GROUP

#### Risk Management Overview, Strategy and Objectives

The Risk Management Framework of AHEL builds on the strength and depth of the risk management processes undertaken in each of the insurance subsidiaries, overseen by the respective subsidiary Boards.

At AHEL level the focus is on assessing the major cross cutting risks and risk concentrations which exist across the insurance subsidiaries. The Group therefore leverages output from the key risk management deliverables from each of these firms, including their

#### Risk Culture

The European Group has an ongoing commitment towards maintaining an effective risk culture, as it is critical to its success in maintaining and developing an effective risk management system. The five key elements which underpin the risk culture are:

- **Visible Leadership** – senior management takes an active role in promoting the risk management framework.
- **Communication** – internal communication to all levels of management and staff to describe and inform (to an appropriate level of detail) the risk framework (strategy, governance), risk policies/procedures and risk profile.
- **Involvement** – appropriate contribution at all levels of management and staff to the processes of identifying, assessing, managing, monitoring and reporting risks. All Company's employees have a responsibility to manage risk.
- **Compensation** – alignment of incentives to risk management objectives and use of risk adjusted performance measures to evaluate performance.

#### AHEL Group Internal Model

AHEL has developed an Economic Capital Model (ECM) which was approved in July 2017 by the PRA. ECM captures all risks within AHEL excluding AIG Life and AIG Israel, and uses the Standard Formula to calculate the capital requirement for AIG Life and AIG Israel. This means that, at a Group level, the ECM is a 'partial internal model' which has to be integrated with the Standard Formula in order to calculate the Group SCR.

Following the Directive and the Delegated Regulation providing several integration techniques, it has been agreed to use Integration Technique 1 as defined in Annex XVIII of the Directive for AHEL.

ORSAs, risk monitoring of key concentrations and the results of stress testing to support the identification of shared risk areas or accumulations of risk which could impact the group as a whole.

Each component of the insurance subsidiaries' risk management frameworks are delivered by both first and second line of defence teams, the outputs of these activities are critical feeds into the Group Own Risk and Solvency Assessment in this report.

- **Professional Development** – provision of information and appropriate levels of training to elevate individual competencies, and thereby organisational capabilities, in risk management across AIG.

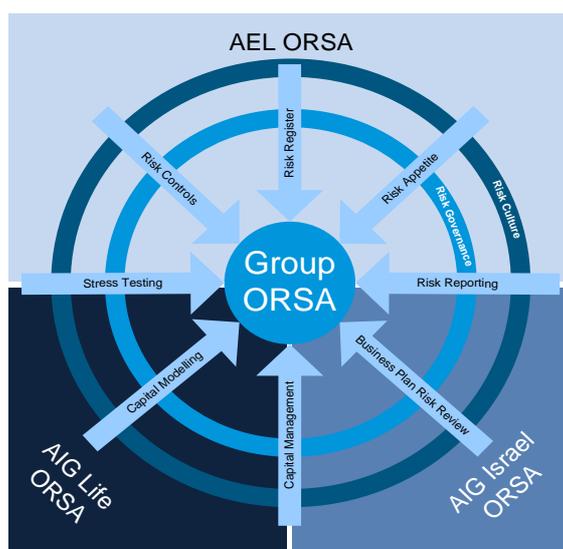
This structure allows for each function and individual to have a clear understanding of their risk management responsibilities and aids embedding an effective risk culture across the European Group. The current risk governance structure provides an oversight and decision-making framework within which material risks are continually identified, assessed, monitored and managed at a regional level.

Following the concept of Integration Technique 1, AHEL's Group SCR will be the sum of the:

- Capital requirement of the partial internal model.
- Capital requirement of the Standard Formula.

There are no risks that are out of scope of the model and there is no intangible asset which is not valued as zero.

## GROUP OWN RISK AND SOLVENCY ASSESSMENT



The AHEL Group ORSA looks at the current and forward looking risk profile of AHEL and its insurance subsidiaries; AEL, AIG Life and AIG Israel. The AHEL Group ORSA is performed, reviewed and approved annually.

AEL / AIG UK, AIG Life and AIG Israel apply a number of governance processes over their respective ORSA, in order to ensure that risk management processes and the risk and solvency positions are appropriately defined, assessed and managed.

The ORSA Report is used to summarise the outputs of these risk management and capital assessment processes. This report includes both the quantitative and the qualitative outputs of these processes and links to their business performance, to assist the Board and senior management in making strategic business decisions.

The AEL / AIG UK ERM function prepares an ORSA report annually as do AIG Life and AIG Israel's risk management function. The ORSA reports are reviewed, challenged and ultimately signed off by each of their respective Boards. In addition, a further interim update of the ORSA may be produced in cases where an event occurs that results in a material change to its Risk Profile, Internal Model or Business Plan. The ORSA process and report is used and embedded in the first line of defence.

The ORSA Report is a distillation of the key outputs from these processes into a key document for management and the regulator.

## AIG EUROPE LIMITED & AMERICAN INTERNATIONAL GROUP LIMITED

### Risk Management Overview, Strategy and Objectives

The Company believes that a strong, effective and embedded risk management framework is crucial to maintaining successful business operations and delivering sustainable, long-term profitability. The Company achieves this through a strong risk culture articulated by effective ERM senior leadership and embodied by management at all levels through its governance structure and risk management processes.

The Company utilises the "Three Lines of Defence" model for risk management, as described in Section B.1.A Management and Governance Structure above. Overseeing the Company's risk management framework is a risk governance structure that encompasses its principal business operations and risk areas and defines a framework of risk committees, risk reporting and risk controls embedded throughout the Company.

The Company seeks to maintain a risk profile that meets the following business objectives:

- Deploy its resources in the service of its customers, accepting risks that the Company is able to manage;
- Maintain the financial strength to assure its customers, affiliates and distributors the Company will be able to honour its commitments;
- Operate from a position of strength on requirements from its external stakeholders including regulatory requirements, creditor covenants and rating agency expectations;
- Take measured risks that generate sustainable and profitable growth and deploy its resources where the Company can achieve the greatest long-term risk-adjusted returns;
- Diversify its revenue streams and sources of risk; and
- Manage its risks actively and positively, to avoid or mitigate risks that are beyond its appetite or not adequately compensated; The Company has limited appetite for risks where it does not receive adequate compensation and ensure they are tightly controlled.

The Company will assume risks that:

- Are aligned with strategic objectives, growth and/or innovation opportunities in specific markets, or where the Company has or can develop a competitive advantage.
- Are well understood by management and where the Company has organisational capabilities or expertise to manage them well.
- Allow the development of information and capabilities for future profitable growth in new markets or segments.
- Are appropriately priced to provide an adequate risk-adjusted return on capital, apart from limited instances as described above as an investment for future growth.

The Company will avoid risks that:

- Expose the Company or the AIG Group to a material level of legal, regulatory or accounting risk, unless appropriate review and mitigation is exercised.
- Result in outsized risk exposures relative to peers or its financial resources.

The Company's approach to risk-taking is quantified through its risk appetite statement which aligns the Company's strategic business goals against the risks it faces, ensuring that these risks are maintained at levels consistent with the Company's financial resources. This, in tandem with continuous management and monitoring of the Company's capital position, ensures that the Company continues to manage its business in an environment of controlled, proportionate risk-taking to generate sustainable earnings and deliver long-term value for AIG's shareholders.

The Company's adherence to its quantified risk parameters is supported by ongoing risk identification exercises conducted across AIG, the outputs of which are documented within its standing risk register framework, which captures the material risks that the company faces. The Company's identified risks are managed through the application of a set of regional Level 2 'Statements of Operating Standards', which align to AIG's global corporate policies and define risk management processes and controls adopted across its business.

The impact of these risk management and risk mitigation activities is given appropriate context through the utilisation of risk management information, which includes the results of the Company's stress testing programs as well as periodical risk reporting assessments provided to the Company's Executive Risk Committees, thereby allowing senior management to take the appropriate decisions required to manage the Company as a risk-aware business.

The Company's Board, through its sister committee, the Board Risk Committee, has ultimate responsibility for development and oversight of the risk management framework; the Board delegates the management of risks within its risk appetite and the risk governance framework to the Company's Risk and Capital Committee (RCC). The RCC escalates matters of importance to the Board as needed.

### Risk Culture

The Company has an ongoing commitment towards maintaining an effective risk culture, as it is critical to its success in maintaining and developing an effective risk management system. The five key elements which underpin the risk culture are:

- **Visible Leadership** – senior management takes an active role in promoting the risk management framework.
- **Communication** – internal communication to all levels of management and staff to describe and inform (to an appropriate level of detail) the risk framework (strategy, governance), risk policies/procedures and the company risk profile.
- **Involvement** – appropriate contribution at all levels of management and staff to the processes of identifying, assessing, managing, monitoring and reporting risks. All Company's employees have a responsibility to manage risk.
- **Compensation** – alignment of incentives to risk management objectives and use of risk adjusted performance measures to evaluate performance.
- **Professional Development** – provision of information and appropriate levels of training to elevate individual competencies, and thereby organisational capabilities, in risk management across AIG.

### Risk Identification

The Company operates in an ever-changing environment, where new risks may emerge periodically, leading the company to continually assess and revise its current risk profile. As a result, the Company participates in an AIG-wide consistent risk identification process and incorporates the assembled risk profiles and identified material risks into its Risk Register and other related elements of the company's Risk Management Framework.

The Company conducts risk identification through a number of methods, including:

- Ongoing assessments of relevant branch level and regional (ExCo level) risks in risk committees;
- Identifying growing or emerging risks through conducting risk analysis and follow up monitoring of the annual business plans of the Company and its many lines of business;

### Risk Register

The Company currently has in place a three-tier structure for the capturing, discussion and assessment of risks. The current three-tier structure is described below:

- **Tier 1** - Comprised of the 'Top Ten' key risks, spanning the whole of the Company's operations. These risks are owned at RCC level.
- **Tier 2** - Comprised of Granular ExCo risks; owned and managed through the Executive Risk Committees that report to the RCC (being the Insurance, Market, Credit and Operational Risk Committees).
- **Tier 3** - Comprised of 24 Branch risks which are managed at a local branch level.

This also allows the Company to better reflect the dynamic, ever-changing risk landscape that it currently operates within a diagram of the three levels of risk is provided below for illustration purposes:

This structure allows for each function and individual to have a clear understanding of their risk management responsibilities and aids embedding an effective risk culture across the Company.

The current risk governance structure provides an oversight and decision-making framework within which material risks are continually identified, assessed, monitored and managed at a regional level.

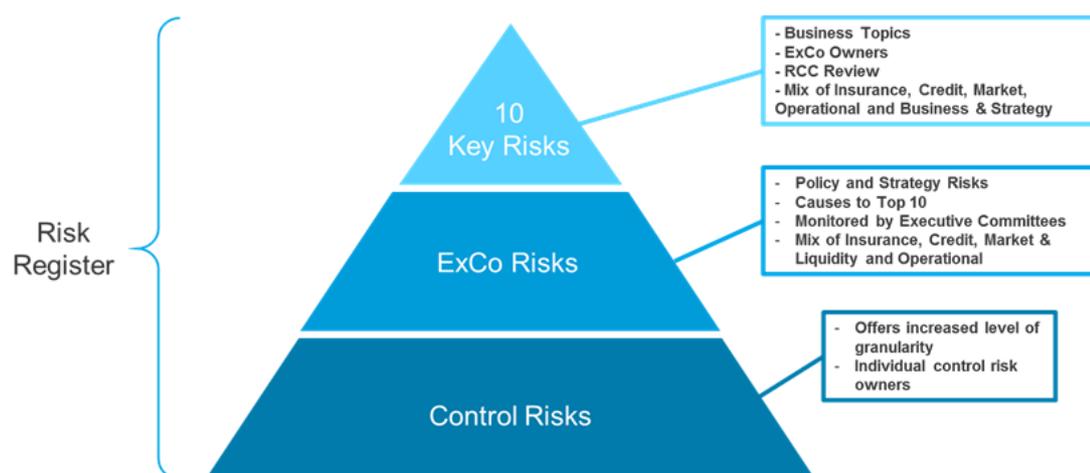
The risk governance structure has three distinct levels of committees (i.e. Board Committees, Executive Risk Committees and Working Group Committees) and is designed to support the Company's efforts in embedding a strong risk culture through the integration of risk management with regulatory requirements and business activities such as strategy and planning. Each of these committees has a distinct role to play within the risk governance framework.

ERM utilises the following set of "Risk Processes" to implement and embed the Company's risk management framework.

- The application of insight from selected external industry studies and media coverage of loss events;
- Participation in and review of the outputs of an enterprise-wide Vulnerability Identification Process, which is designed to ensure that potential new or emerging risks are brought to the attention of senior management; and
- The assessment of internally and externally generated loss events and Risk and Control Self Assessments (RCSAs).

The outputs from these activities enable the Company to identify key areas for focus and to identify their potential impact on the company's risk profile.

The risks identified at Tier 2 and Tier 3 levels are designed to align to the 'Top Ten' key risks identified for Tier 1. This enables the Company to maintain a dynamic, interactive risk register structure, where issues or developments within specific risks at a certain level are discussed and taken into account for relevant risks within the other tiers, regardless of whether they are at a Europe-wide or local level.



#### Tier 1: 10 Key Risks

The 'Top Ten' risks are designed to align to the five main risk categories of Insurance, Market, Operational, Credit and Business/Strategy Risk. This allows the Company to produce risk dashboards for the RCC, ExCo and BRC covering all of the 'Top Ten' risks, as well as a more detailed report for each relevant Risk Committee. Please see Section C for the Company's list of Top Ten risks.

#### Risk Management and Control

The management of the Company's key risks and the establishment and application of relevant mitigating controls is an essential part of the management of its activities against appetite. Without appropriately designed and monitored controls, the likelihood of the Company being in line with its defined risk appetite is reduced. Therefore the management of the Company's risk controls plays a key part in its Risk Management Framework.

#### Monthly risk reports

ERM produces monthly reports covering the activities of the Insurance, Market, Operational and Credit Risk Committees for review by the RCC, which provides users with an overview of:

- Key internal or external risk developments over the last month that may impact on the Company's risk profile;
- Updates on the progress of remediation on identified management actions;

#### Quarterly risk assessments

The ERM function co-ordinates the production of detailed Regional Risk Reports covering each of the Company's "Top Ten" risks for discussion by the Insurance, Market, Operational Committees before reporting these to the RCC on a quarterly basis.

These reports communicate ERM's view of the current and future risk and control landscape around each of the "Top Ten" key risks. These assessments utilise a combination of qualitative and quantitative factors (most notably the current calculated risk appetite

#### Stress and scenario testing framework

Since IMAP approval by PRA in July 2017, the Company calculates its capital requirements using its own Internal Model. Since the internal model provides a more tailored and comprehensive assessment of the Company's risk profile compared to the Standard Formula, the Internal Model is deemed to deliver the Company's true economic view of risk.

The Company makes significant use of Stress and Scenario Testing for the purpose of quantifying both the capital and liquidity implications of certain risks under internal model. The Company's suite of stress and scenarios tests are utilised in the following areas:

#### Tier 2: The 'ExCo' Risks

The entity level key risks within Tier 1 are then broken down into more granular ExCo risks. These ExCo risks are managed by the respective Insurance, Market and Operational risk committees, with cross-cutting Business/Strategy Risks managed at the RCC. Each of these risks has a number of potential causes and controls which require review and management, interacting with global and regional support functions. These ExCo risks are supported by specific tailored Key Risk Indicators for use in committee decision making.

#### Risk reporting and risk indicators

ERM periodically reports on the results of the processes above and the position of Key Risk Indicators (KRIs) through the Risk Governance Framework. This risk reporting and communication framework principally consists of three channels, being the Monthly Risk Reports and Quarterly Risk assessments (both of which utilise KRIs) as well as the Quarterly Zone Hydras.

- Actions and points of focus in the last risk type committee (Insurance, Market, Operational and Credit Risk committees); including reviews of relevant ExCo-level risks; and
- Results of relevant, in-scope KRIs relating to each risk.

These reports are designed to provide senior management with an ongoing overview of developments to the Company's risk profile and concurrent risk management activities, and act as a bridge between iterations of more detailed Quarterly Risk Reports.

for each "Top Ten" key risk against its defined risk appetite) to grade each of the "Top Ten" key risks from high to low risk.

This reporting format provides executive management with a detailed breakdown of the Company's major risk areas and delivers up-to-date analysis of the granular details of the Company's risk profile.

**Internal Model Calibration** - The results of Stress and Scenario Testing are key calibration inputs for two modules of the Company's internal model; Operational Risk and Man-Made Catastrophe Risk. For each risk module, a representative set of scenarios are designed and the results are used as calibration points for the model.

**Internal Model Validation** - Stress and Scenario Testing is used to independently validate the internal model, through providing an alternative, quantitative lens to view specific risks and compare against the internal model output (e.g. comparing specific model simulations against independently calculated scenarios).

**Business Plan Risk Review** - With the annual business plan providing a best estimate projection, the Company stress tests the forecasts to understand the impacts of various scenarios on both profitability and the Company's future capital position.

**Reverse Stress Testing** - The Company performs annual Reverse Stress Testing exercises to identify and assess events and circumstances that would cause the Company's business model to become unviable. Reverse Stress Testing allows the Company to

### Solvency Capital Management

As stated above, since Internal Model approval by PRA in July 2017, the Company's Solvency Capital Requirement is calculated using its Internal Model.

Management develop and regularly reassess capital targets and operating ranges in order to ensure the Company holds an appropriate and efficient amount of capital. A suite of stress and scenario tests are employed to independently assess the level of capital buffer above the Internal Model – Solvency Capital Requirement (IM-SCR).

For the risk appetite framework, the Company utilise a further basis, a view of loss assessed in terms of its direct impact on its 1:200 capital resources, the basis being Solvency II, with no discounting or provision for tax loss absorbency. The Company refers to this approach as its "Risk Profile Valuation Basis" and it provides a further lens through which to analyse and assess its risk profile.

This basis allows for risk management decisions to be based on a

## B.4 OWN RISK AND SOLVENCY ASSESSMENT

The Own Risk & Solvency Assessment (ORSA) is a set of processes undertaken to define, assess and manage the risk and solvency capital position of the Company. The ORSA Process draws together the results and analysis delivered through each of the above risk processes and provides a current and forward-looking assessment of the Company's risk profile.

### ORSA Governance

The Company applies a number of number of governance processes over the Company's ORSA, in order to ensure that risk management processes and the risk and solvency position of the Company are appropriately defined, assessed and managed. The Head of Risk Framework, Monitoring & Regulatory Reporting is

### ORSA Report

The ORSA Report is used to summarise the outputs of these risk management and capital assessment processes. This report includes both the quantitative and the qualitative outputs of these processes and links these to the Company's business performance, to assist the Board and senior management in making strategic business decisions.

The ERM function prepares at least one ORSA report annually and this is reviewed, challenged and ultimately signed off at Board level. In addition, a further interim update of the ORSA may be produced in cases where an event occurs that results in a material change to the Company's Risk Profile, Internal Model or Business Plan. The

assess the extreme risks which could threaten the Company and consequently ensure early warning indicators and both mitigating (pre event) and remediating (post event) management actions have been developed.

**Emerging Risk Stress Testing** - Stress and Scenario Testing is used to quickly quantify the Company's exposure to emerging risks. Shifting macro-economic trends and external events are assessed through stress testing to deliver entity-specific loss analysis.

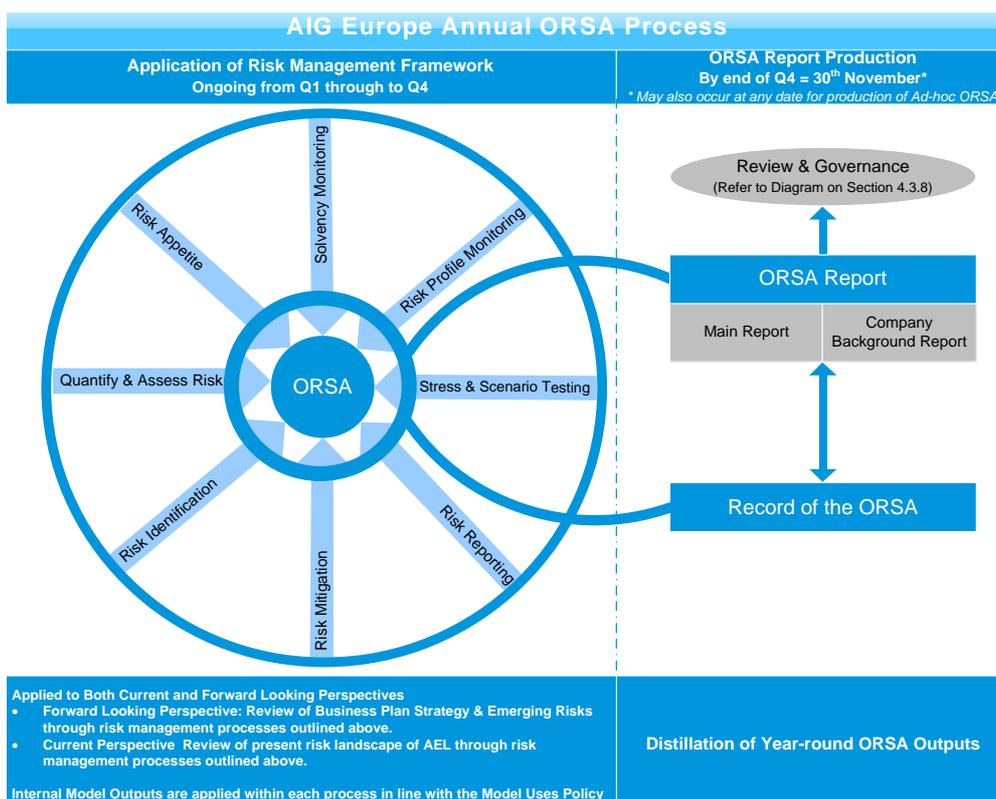
clear understanding and quantification of risk (in terms of loss to capital resources) at a given probability. The Company's risk profile is assessed on this basis at the 1:7 and 1:200 loss points.

AEL targets holding sufficient capital to meet the IM SCR run off to 'ultimate' and withstand various stresses. The Company's Internal Model SCR is designed to capture all relevant risks faced by the business over a 1-year time horizon. Management believe that the capital buffer is sufficient to provide for the run-off of liabilities beyond the 1-year time horizon, to cover all risks until the ultimate settlement of all liabilities (ultimate SCR). Regular stress testing supports the assessment of the target capital buffer. The Company has available Tier 1 and Tier 2 capital to meet its IM-SCR and target capital buffer although it aims to fully hold its capital requirement in Tier 1.

responsible for conducting centralised risk management activities such as documenting the ORSA Report, maintaining the risk register and producing management information packs for several risk committees.

ORSA process and report is used and embedded in the first line of defence.

The ORSA Report is a distillation of the key outputs from these processes into a key document for management and the regulator. The submission of the final ORSA report includes the completion of several key business processes undertaken by Enterprise Risk Management (ERM) in conjunction with wider business management. The diagram below provides an indication of the ORSA process, including the principal internal stakeholders (such as the Risk and Capital Committee, ERM and the Company Board) and how it fits in with the Company's key business processes:



### B.5 INTERNAL CONTROL SYSTEM

The description of the internal control system is disclosed in Section B1A.D Key Functions, Roles and Responsibilities above along with the description on Finance Function.

### B.6 INTERNAL AUDIT FUNCTION

The description of the internal audit function is disclosed in Section B1A.D Key Functions, Roles and Responsibilities above within the internal audit function.

### B.7 ACTUARIAL FUNCTION

The description of the actuarial function is disclosed in Section B1A.D Key Functions, Roles and Responsibilities above within the actuarial function.

### B.8 OUTSOURCING ARRANGEMENTS

The 'Outsourcing' subsection of the report aims to provide a description of the Company's critical outsourcing activities and the outsource service providers. The Company's Outsourced Service Providers (OSPs) are defined as Third Parties that perform/provide core business activities, i.e. insurance products/services (and/or regulated activities) on behalf of the company.

The Company utilises outsourcing arrangements for a number of operational activities in order to reduce operational costs and free internal personnel for other key functions within the Company.

The screening/due diligence process confirms if a vendor is suitably qualified and possesses the expertise, experience and capabilities for the goods and/or services being provided to the Company. The area's Senior Management is required to ensure adherence to internal policies, procedures and applicable international, regional and local laws and regulations. The process also investigates if the vendor is financially sound based on the vendor's current financial and other key operating information, which is either publicly available or provided by the Vendor.

The Risk and Control Services/Commercial team are responsible for the relevant risk management and assurance of AIG's policies associated with outsourcing. The policy addresses regulatory, legal and control requirements that require proper governance and management of the Company vendors. In addition, other policies and standards are adopted to comply with regional and local laws and regulatory requirements.

A risk rating (High, Medium, and Low) for each vendor is assigned to assure the appropriate oversight is performed in conjunction with the Control Groups and establishes the frequency and mechanism for initial and ongoing oversight. The scope and frequency of ongoing oversight of a vendor may be increased or decreased due to but not limited to the following:

- change to legal/regulatory requirements and laws;
- notification of a security incident, privacy incident;
- change in ownership of the vendor; and
- control issues identified during an assessment.

Risk-based oversight, monitoring and management reporting of vendor activities to the area's Senior Management must be established and performed by the Business Sponsor/Contract Owner on a regular basis. Each vendor engagement must have a sponsor/ contract owner who is responsible for establishing, maintaining and managing the vendor as well as its performance for goods or services provided. Performance monitoring includes but is not limited to:

- assessing adherence to contracts terms;
- reviewing contract performance and operational issues;
- ensuring that the vendor is complying with consumer protection laws and regulations;
- reviewing customer complaints about services or products handled by the vendor; and

- assessing the adequacy of business recovery and business contingency plans and reporting and monitoring of metrics (e.g., KPIs)

During the reporting period the following auxiliary functions were outsourced:

Outsourced operation	Jurisdictions	Description
Administration	Ireland, Spain & Switzerland.	Administration & fulfilment; premium collection, data entry, refunds and billing.
Claims Handling	Belgium, Denmark, France, Italy, Portugal & UK.	Claims handling and settlement.
Sales, Distribution & Underwriting	Denmark, Netherlands & UK.	Advised & non-advised Sales, introductions, underwriting.
Sales	Greece, France, Spain & UK.	Sales & distribution: non-advised sales.
Specialist Technical Services	Belgium, Spain & UK.	Surveyors, appraisers and engineers.

*The Company has outsourced contracts across Europe. This table shows the material jurisdictions based on the estimated annual cost.*

### B.9 Adequacy and Appropriateness of the System of Governance

As mentioned above, the AHEL Board delegates the governance of its subsidiaries to the Boards of AEL, AIG UK, AIG Life, AIG Israel and its two other non-insurance entities, Laya Group and AIG Advisors SRL. The simplified governance structure has been designed to ensure that management are able to provide the appropriate levels of oversight whilst allowing decisions to be made more quickly and ensuring that the employees of each subsidiary are empowered to make decisions at the right levels.

Each insurance subsidiary continues to align its management and governance structure to proactively respond to the business and regulatory needs.

The various Board-level committees of each subsidiary have clearly defined responsibilities which have been delegated by their Boards. These committees are in turn supported by the relevant working groups, forums and sub-committees whose members and attendees have specific experience and expertise, allowing them to provide more detailed review and oversight.

These bodies are empowered to make decisions and take actions within the limits of their delegated authority, thereby allowing each subsidiary, and consequently the European Group, to adapt to changes in an agile and flexible manner.

### B.10 Any other material information

Aside from the information provided in Section B there is no other material information of the system of governance of the Company during the period.

The governance structure therefore provides a mechanism for the European Group to anticipate and respond to potential changes in the business environment or risk profile within an appropriate period of time. The governance structure is also designed to facilitate the formulation, scrutiny and once approved, implementation of strategy. As a member of a wider group, the broad strategic direction of the European Group as a whole is set by AIG, Inc.'s executive operating committee. The ExCo formulates a detailed strategy for the European Group in the form of the annual business plan, taking account of AIG Group strategic direction. The plan is presented to the Board who scrutinise it to assess its benefits and risks to determine whether its implementation would be in accordance with:

- The European Group's risk appetite;
- The European Group's short-term and longer-term strategy and business plan;
- The European Group's legal and regulatory duties in each jurisdiction;
- The fair treatment of those who are (or may become) the policyholders of its insurance subsidiaries; and
- The safety and soundness of the European Group.

The AHEL Board's terms of reference give it overall responsibility for setting the European Group's strategy and it will not approve any strategy that, its opinion, does not meet the above criteria.



## Solvency & Financial Condition Report 2018

### C. Risk Profile

The Risk Profile section of the report captures the complexity of the overall risk status of the Company, taking into account all the material risks to which the Company is exposed.

**FOR EACH MAJOR RISK GROUPING, THIS SECTION PROVIDES A DESCRIPTION OF:**

- Risk exposure;
- Measures used to assess the risk;
- Risk concentration;
- Risk mitigation; and
- Risk sensitivities

### C. RISK PROFILE

The Company believes that a strong, effective and embedded risk management framework is crucial to maintaining successful business operations and delivering sustainable, long-term profitability. The Company's goal is to achieve this through a risk culture articulated by its ERM senior leadership and embodied by management at all levels through the governance structure and risk management processes.

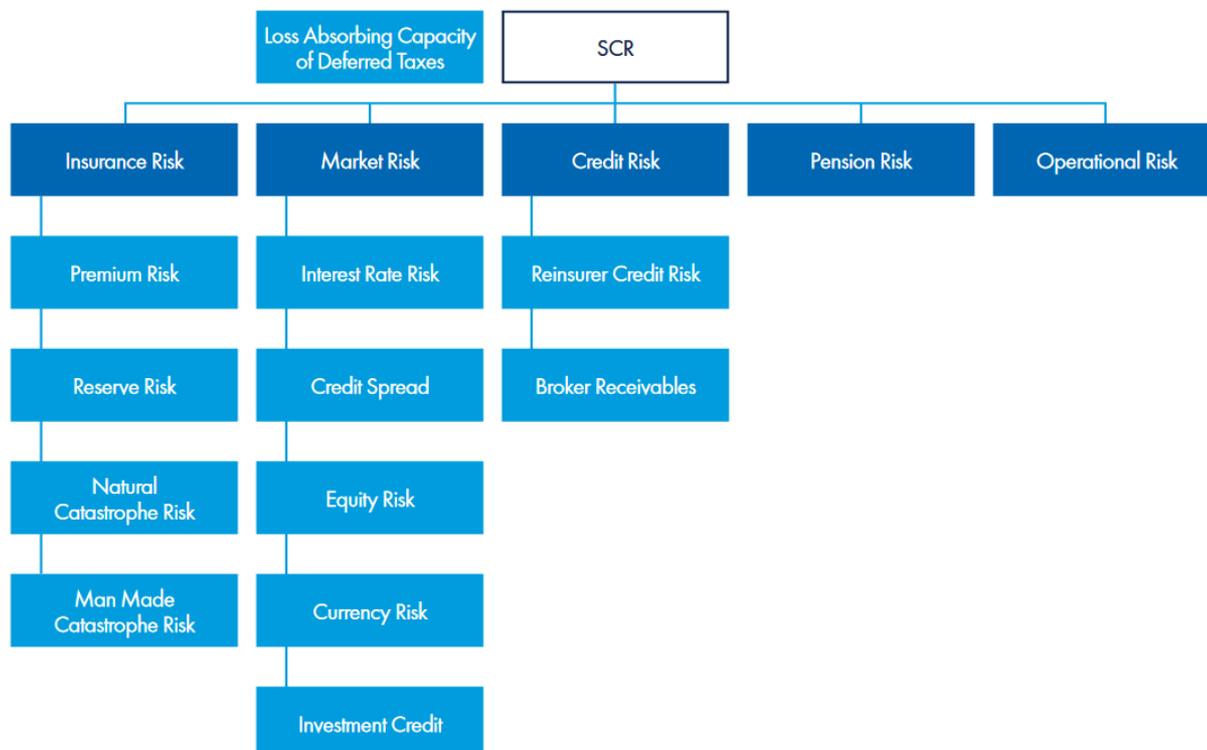
AHEL's capital requirement under Solvency II (which seeks to quantify and reflect its current risk profile) is calculated on a consolidated group basis through the Partial Internal Model (PIM). AHEL currently has and is forecast to maintain a capital surplus above this binding capital constraint over the horizon of our business plan, with each of AHEL's subsidiary insurance entities maintaining capital above their solo entity SCR's.

European Group SCR £'m	AIG UK	AEL	AHEL	AIG Life	AIG Israel	Standard	Group SCR
	Standalone	Standalone*	Partial Internal Model *	Y/E 2018	Y/E 2018	Formula Consolidated	
	Y/E 2018	Y/E 2018	Y/E 2018	Y/E 2018	Y/E 2018	Y/E 2018	Y/E 2018
Insurance risk	0.0	1,964	2,012	105.3	165.4	251.4	2,263
Market risk	0.0	678	680	17.7	49.2	78.2	758
Credit risk	0.5	214	214	17.0	23.5	36.0	250
Operational risk	0.0	281	281	11.1	8.2	16.2	297
Pension risk	0.0	69	83	0.0	0.0	0.0	83
Loss Absorbing capacity of deferred taxes	0.0	(17)	(17)	(4.6)	(31.7)	(33.2)	(50)
Diversification	0.0	(786)	(799)	(40.1)	(92.7)	(139.5)	(939)
Planned UW Profit	0.0	120	120	0.0	0.0	0.0	120
Total SCR	0.5**	2,524	2,574	106.4	121.9	209.1	2,783

\* As AHEL applied for a Major Model Change in 2018 in agreement with the PRA AEL's and AHEL's internal models were frozen to the capital requirements submitted as part of the application.

\*\* Even though the SCR is £0.5m the Company has to hold capital equivalent to the MCR which is calculated at £3.3m. Details of the MCR calculation are provided in section E.2.2 Minimum Capital Requirement.

The schematic below articulates the risks in scope of the Internal Model:



### Risk Profile, Measurement and Assessment

The Company's Risk Management Framework supports the identification, measurement, management, monitoring and reporting of the five major risk groupings the Company is exposed to, including:

- Insurance Risk;
- Market Risk;
- Credit Risk (Counterparty Default Risk);
- Operational Risk; and
- Pension Risk.

The Company's Risk Profile is a point in time measurement of the risks that the Company is exposed to. The Company's risk assessment draws on available Management Information (MI) and Key Risk Indicators (KRIs) to provide context to judgements and strategic decisions, which are split between a current and forward looking perspective on each of its major risks.

KRI results, particularly those that breach an agreed trigger level, are discussed within the appropriate risk committee within the risk management governance structure to identify the root cause and to approve remedial actions for the relevant risk owners to execute.

Where key risk hotspots are identified, being either those that have crystallised or may potentially emerge, the assessments will quantify their potential or actual impact and propose remediation actions for specific Risk Owners and management to take note of and, if agreed, execute.

The Company has identified a number of risks that may potentially impact on the successful execution of its business plan and ability to generate sustainable profits during 2019 and beyond.

### Top Ten risks on the Company's Risk Watch List

Risk Area		Description
Insurance Risk	1	Failure of Pricing, Product or Strategy
	2	Aggregation / Accumulation Risk – Natural Catastrophe
	3	Aggregation / Accumulation Risk – Man Made Catastrophe
	4	Adverse Reserve Development
Market Risk	5	Unexpected Loss in Market Value
	6	Liquidity Risk
Credit Risk	7	Unexpected Credit Loss – Reinsurer Failure
	8	Unexpected Credit Loss – Other Counterparties
Operational Risk	9	Operation Risk
Business & Strategic Risk	10	Business & Strategy Risk

## C.1 INSURANCE RISK (UNDERWRITING RISK)

Insurance Risk encompasses the risks the Company is exposed to arising from its insurance underwriting operations and is broadly split and assessed between the following risk categories:



### INSURANCE RISK EXPOSURES

#### PREMIUM RISK

Premium Risk is the risk that the loss experience for the future accident year is different from the central assumption. More specifically, Premium Risk results from fluctuations in the timing, frequency and severity of insured events. It relates to risks from policies that will be written during the period (including renewals), and to unexpired risks on existing contracts. Premium Risk includes the risk that premium provisions turn out to be insufficient.

#### RESERVE RISK

Reserve risk is the risk that the eventual reserve requirement is greater than that currently held. More specifically, reserve risk relates to the risk that technical provisions are inadequate due to fluctuations in the timing and amounts of claim settlements. Under Solvency II, it relates to the possible inadequacy of claims provisions, i.e. provisions in respect of business already earned. It also covers the uncertainty in expense provisions relating to this business.

#### NATURAL CATASTROPHE RISK

The Company is exposed to various catastrophic events in which multiple losses can occur and affect multiple lines of business in any calendar year. Natural disasters, such as hurricanes, earthquakes and other catastrophes, have the potential to adversely affect operating results.

#### MAN MADE CATASTROPHE RISK

Man-made catastrophe risk represents the uncertainty regarding aggregate loss potential caused by human activities; including terrorism, financial crisis, latent diseases.

The Company's exposure to Insurance Risks is the largest contributor to its capital requirement and represents 62% of the total of allocated risks.

### MEASURES USED TO ASSESS INSURANCE RISK

#### Premium Risk (Non Cat)

The modelling of separate capped and excess losses allows the Company to model reinsurance explicitly based on treaties that are in place to determine a distribution of potential net losses. Facultative and captive reinsurance are modelled using a

factor/proportional based approach. Excess of Loss reinsurance is modelled on a claim by claim basis.

Using historical loss data split by line of business into homogeneous groups (claims with the same underlying behaviour), loss ratio data is adjusted for changes in rates and inflation.

The process is calibrated by Corporate Actuarial and reviewed by Pricing Actuaries and their profit centers, with guidance on techniques and tools from the Economic Capital Modelling team. This ensures alignment with the pricing and reserving process

#### Premium Risk (Natural Catastrophes)

The Company predominantly utilises a third party Catastrophe Model to model the occurrence and severity of events for windstorm/hurricane, earthquake and flood.

The model uses actual exposure sets of individual in-force policies as a proxy for future exposures. Premium is used as a proxy for exposure and so for changing books the Nat CAT is scaled by change in on-levelled premium.

By modelling individual policies we are able to model more granularly, model facultative reinsurance explicitly and also deliver average cat loss by policy to aid premium setting.

#### Premium Risk (Man-Made Catastrophes)

Scenarios are developed for each threat based on a 1 in 40, 1 in 100 and 1 in 250 year return period.

Insurance claims arising from scenarios such as latent disease, terrorism, systemic financial markets events, products recall, pandemic and aircraft collision are all considered. These scenarios are based on events not experienced in our loss data, but some non-zero probability potential loss still exists.

When deriving each scenario the impact of multiple lines of business is considered. Workshops with product tower managers,

risk officers and actuaries are used to identify and determine scenario inputs. The scenarios are calculated on a gross, gross less facultative and net basis. An Expert Panel reviews and signs off on the scenarios.

### Reserve Risk

The Reserve variability method is to re-project the reserve outcome thousands of times such that a range of reserve outcomes is produced. The method that we use looks to mimic a re-reserving exercise following further development and payments modelled in each simulation.

Consistency of reserve risk calibration is discussed with other parts of AIG in particular the difference in outcome from using other available techniques.

A factor based approach is used to estimate risk on a one year time horizon vs. an ultimate time horizon perspective. A one year time horizon is used to calculate the Solvency II SCR.

The process is calibrated by Corporate Actuarial with guidance on techniques and tools from the Economic Capital Model (ECM).

The reserve risk calibration process is done at the same time as that for premium risk ensuring consistency both in terms of data and approach.

Statistical distributions of reserve volatility are selected for each of the lines of business calibrated using historical data and expert judgement regarding the best fit going forward

The following Key Risk Indicators (KRI) are used by the Company to qualitatively assess the risks described in the previous section:

Insurance Risk Components	Key Risk Indicators (KRIs)
Premium Risk	Premium Adequacy ratio per line of business. A ratio of 100% indicates the line of business is expected to exactly break-even.
Reserve Risk	Accident Year Ultimate Loss Ratio vs Budget , Incurred Loss Ratio vs 5 Year Average, Magnitude of Prior Year Reserve Movements
Natural Catastrophe Risk	Natural Catastrophe Accumulations
Man-Made Catastrophe Risk	Terrorism Accumulations

There are no material changes to the measures used to assess Premium Risk, Reserve Risk, Natural Catastrophe Risk and Man-Made Catastrophe Risk during the year 2018.

### INSURANCE RISK CONCENTRATION

Insurance risk concentration occurs due to the concentration of an insurance operation in a particular geographic area, industry or insurance peril. It may also occur as a result of a correlation between individual insured perils.

The largest concentrations of risk relate to potential natural catastrophe losses with the highest being a European windstorm, followed by a European earthquake, a North American earthquake, and a North American windstorm.

### INSURANCE RISK MITIGATION TECHNIQUES

The Company manages insurance risks by monitoring and controlling the nature of and accumulation by geographic location of the risks in each line of business underwritten, the terms and conditions of the underwriting and the premiums the Company charges for taking on the risk. This is achieved through a number of common techniques and procedures; some of the more significant of these are highlighted below:

Type of risk	Risk mitigation techniques
<b>Premium Risk - Failure of pricing</b>	
Pricing guidelines	The Company seeks to manage pricing risk through the setting and review of pricing guidelines relevant to each business line and the application of a strict hierarchy of underwriting authorities to ensure that policies are underwritten with management oversight.
Review of large and unusual transactions	Large and unusual transactions are referred to the Large and Unusual Transactions (LUT) referral group, primarily comprised of members of the Company's Insurance Risk Committee for consideration from a Statement of Financial Position, liquidity and portfolio point of view before the Company becomes committed.
Purchase of reinsurance	The Company also mitigates exposure to pricing risk through the purchase of reinsurance.
<b>Premium Risk - Ineffective strategy / Failure of product</b>	
Review of business plans and new products	The Company seeks to manage this risk through the use of processes and procedures over the production, review and analysis of annual business plans and the introduction of new products for each line of business, prior to approval and execution.
Assessment of key projects and strategic investments	The Company also has processes in place for the identification, assessment and approval of key projects and strategic investments.
<b>Reserve Risk - Adverse reserve development</b>	
Monitoring adherence to claims reserving policies and procedures	The Company seeks to manage this risk through monitoring adherence to established policies and procedures in place governing claims reserving practices.
<b>Catastrophe Risk - Failure to manage risk aggregation / accumulation</b>	
Use of pre-bind rules and authorities	The Company seeks to manage this risk through the use of pre-bind rules and authorities to manage significant within line and cross-line exposures.

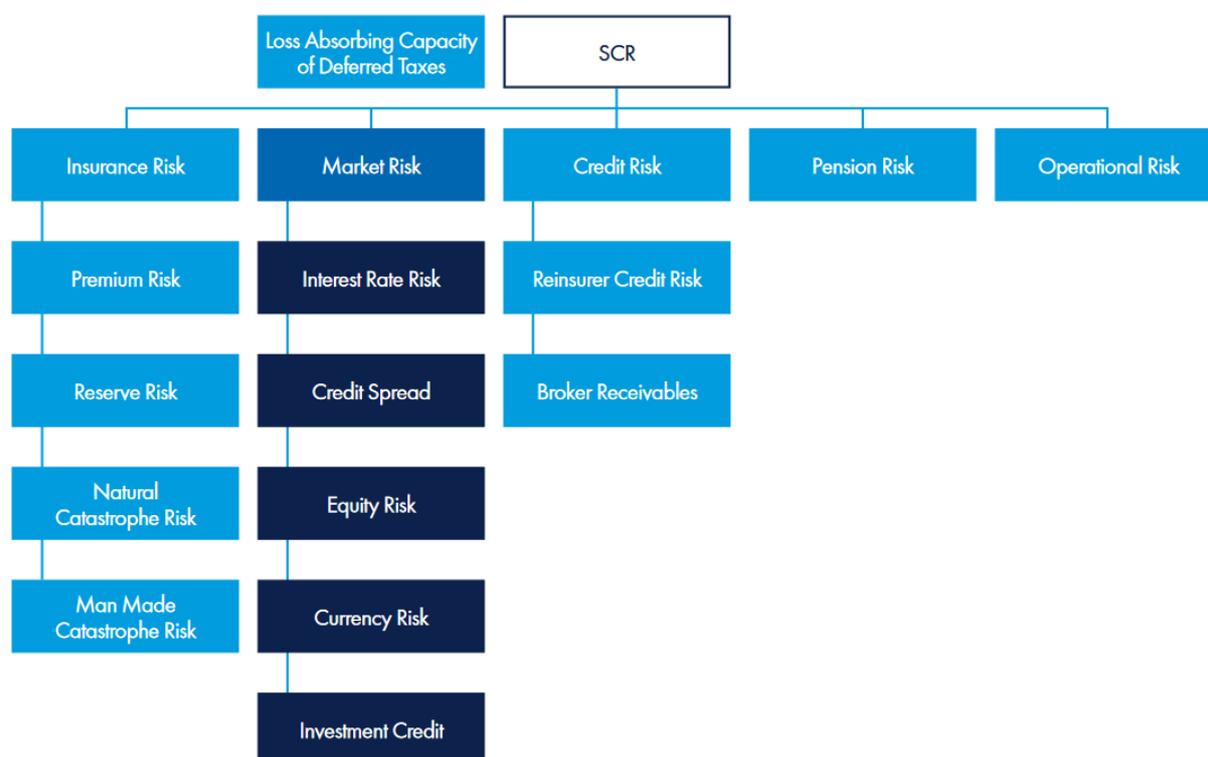
Type of risk	Risk mitigation techniques
Review of large and unusual transactions	Large and unusual transactions are referred to the LUT for further consideration.

### **PROCESS FOR MONITORING THE EFFECTIVENESS OF INSURANCE RISK MITIGATION TECHNIQUES**

As disclosed in Section B.1.A above, the RCC actively monitors the continued effectiveness of the above risk mitigation techniques through processes and deliverables including the Risk Register, Risk Appetite Framework, Internal Model Output (for risk analytics), Stress and Scenario Testing and Risk Indicator Reporting. The outputs of these risk processes are fundamental to the delivery of the Own Risk and Solvency Assessment (ORSA).

In relation to Reserve Risk, the Company's Actuarial Team conducts quarterly reserve reviews of the Company's overall book to determine appropriate reserve levels and quarterly reviews of the Company's expected IBNR adequacy. The Company also employs external consultants to perform reviews of its reserves to provide an independent review of their adequacy.

## C.2 MARKET RISK



Market risk is the risk that the Company is adversely affected by movements in the market value of its financial assets arising from market movements, such as credit spreads, interest rates and foreign exchange rates or other price risks. Market Risk is the second largest risk type.

The Company is exposed to Market Risk on both the asset and the liability sides of its balance sheet, through both on and off-balance sheet exposures including, but not limited to:

- Assets in the Company's investment portfolio including, but not limited to, bonds, loans, structured products, equity, alternative investments and real estate;

- Capital markets transactions, such as exchange-traded and over-the-counter derivatives;
- The Company's insurance businesses providing services to clients that can generate assets and liabilities with valuations linked to Market Risk Factors
- Operating Subsidiaries that maintain their financial records in a currency other than the British Pound, generating foreign exchange translation risk; and
- Transactions that require cash-flow settlement in a currency other than the functional currency, generating foreign exchange transaction risk.

### MARKET RISK EXPOSURE

A description of the Company's components of Market Risk is shown below:

Market Risk Components	Description
Spread risk	The potential financial loss due to the increase in the spread that an asset trades at relative to comparable government bonds hence a decrease in the asset's market value.
Currency risk	The potential financial loss arising from the change in value of currency exchange rates or from closing out a currency position at a loss due to adverse movements in exchange rates.
Interest rate risk	The potential financial loss arising from the reduction in the value of the investment portfolio and liabilities due to changes in the level of interest rates.
Equity risk	The potential financial loss arising from the reduction in the value of the investment portfolio due to changes in prices of equities, mutual funds and equity-linked capital market instruments. The Company's exposure to Equity risk is immaterial because holdings in underlying equity securities are not significant.
Investment Credit Risk	In the process of purchasing investment assets to pay claims and meet future liabilities AIG is exposed to investment credit risk. Investment credit risk is the risk of idiosyncratic or systematic default within our investment portfolio which results in credit losses and impairments.

## MEASURES USED TO ASSESS MARKET RISK

Systematic movements in market factors are produced by an external Economic Scenario Generator (ESG). As well as simulating systemic movements in individual market risk factors, the ESG also generates co-movements in market risk factors. These are an important component of the Internal Model dependency structure. The dependency between economic factors such as GDP and inflation are used for dependencies with other risk types.

The Internal Model provides several mechanisms by which movements in market risk factors can impact the Company:

- Valuation of invested assets;
- Valuation of derivative instruments;
- Discounting of liabilities; and
- Insurance risk outcomes (i.e. inflation driving larger claims).

- Foreign exchange translations applied in the simulations of financial statements during SCR computations.

In addition to Interest Rate, Credit Spread, Equity and Exchange Rate risk, Asset Credit risk is included within the Market risk sub-module. This also helps from a governance perspective since representatives from AIG investments are an integral part of market risk framework. Moreover, through co-ordination with AIG investment, the Company can influence both their market risk and invested asset credit risk profiles.

The following Key Risk Indicators (KRI) and Early Warning Indicators (EWI) are used by the Company to qualitatively assess the risks described in the previous section:

### Market Risk Components Key Risk Indicators (KRIs) / Early Warning Indicators (EWI)

Spread risk	EWI based on spread indexes. A rise of more than 40bps for an index of single A rated bonds over a quarter will trigger discussion about a change in SAA.
Currency risk	FX exposure is monitored on a quarterly basis and the MRC is informed of the exposure when thresholds (2% and 5% capital) measured with a 1 year VaR are breached.
Interest rate risk	Monitor 5Y swap rate movements. An intra-year move of over 75 basis points should trigger discussions about change in SAA at the MRC. Monitor 1Y and 5Y Swaptions implied volatility to assess market sentiment in interest rates. Monitor Overnight Index Swap (OIS) rate vs central bank base rates to assess market sentiment about base rate increase by the central bank.

There are no material changes to the measures used to assess market risk during the year 2018.

## MARKET RISK CONCENTRATION

The Company holds and maintains a diversified investment portfolio in corporate bonds, government bonds, securitisations, loans and mortgages, un-listed equities, mutual funds, investments in group undertakings (participations) and short-term deposits.

The Company has a well-defined Risk Appetite for Market Risk (and its Investment activities) and it manages its Investment portfolio so that the Total Return is maximised and risks do not breach the concentration limits. Market Risk Concentration – by Credit Rating.

Bonds (government, corporate and securitised assets) comprise the largest portion of the Company's investment portfolio out of which 77% were either rated AAA, AA or A in 2018. Therefore, the Company's exposures to the increase in corporate spreads and downgrade in ratings are concentrated within bonds rated A and above.

Asset Ratings	Market Risk Concentration £m	Market Risk Concentration %
AAA	2,493	23%
AA	2,688	24%
A	2,840	26%
BBB	1,166	11%
BB	336	3%
B	196	2%
Not Rated	1,275	12%
<b>Total</b>	<b>10,993</b>	<b>100%</b>

Source: QRT S.06.02.04

## MARKET RISK CONCENTRATION – BY ISSUER

The top exposures (by Solvency II market values) are:

Issuer names	Market Risk Concentration £m	Market Risk Concentration %
Government of the United States	566	5%
United Kingdom	480	4%
Republic of France	348	3%
Federal Republic of Germany	195	2%

Source: QRT S.06.02.04

Each of the issuers above is currently a national government and therefore, the associated market risks are considered to be low.

### MARKET RISK CONCENTRATION – BY CURRENCY

The Company have large asset exposures to British Pound, Euro and US Dollars. The split of excess of assets by major currencies is as follows:

Currency	Market Risk Concentration £m	Market Risk Concentration %
Euro	4,951	45%
US Dollar	2,448	22%
British Pound	2,563	23%
Other	1,030	9%
<b>Total</b>	<b>10,993</b>	<b>100%</b>

Source: QRT S.06.02.04

### MARKET RISK MITIGATION TECHNIQUES

The Company manages its investment portfolio with respect to the risk profile of its liabilities in order to minimise the impact on its solvency position due to adverse market movements. Risk mitigation

### RISK MITIGATION AND THE PRUDENT PERSON PRINCIPLE

The Company's investment management policy ensures its continued compliance with the Prudent Person Principle (PPP) as laid down in Article 132 of the Directive 2009/138/EC.

As detailed in Investment Performance in section A above, the Company's investment management framework sets out its SAA that is approved by the Board and is reviewed annually.

Asset categories that are included in SAA are those that are suitable for the Company's liabilities profile by nature, term and currency and for which AAMEL (the investment manager) could assess, monitor

of market risk is executed through the combined use of investment limits, guidelines and principles detailed below.

### PROCESS FOR MONITORING THE EFFECTIVENESS OF MARKET RISK MITIGATION TECHNIQUES

The scope and magnitude of the Company's market risk exposures is managed under a robust framework that contains documented risk taking authorities, defined risk limits and minimum standards for managing market risk in a manner consistent with the Company's Risk Appetite.

The Board of the Company either as a whole or through its committees oversees market risk and approve annually the Company's Risk Appetite Framework which contains among other things, the risk appetite for Market Risk.

The Board of the Company discharges its responsibility for oversight of the Policies and Procedures through the RCC, and as such is empowered to provide guidance and oversight regarding Market Risk. The RCC is chaired by the CRO.

The MRC, chaired by the Company's CFO, was established by the Company's RCC as one of its four sub-committees. The primary purpose of the MRC is to monitor and manage the Market Risk profile of the Company against the Board approved Risk Appetite. The MRC regularly reviews the latest market risk developments and requests more precision when needed.

and control risks. The Company doesn't invest in any asset category that is not included in SAA.

Tactical deviations from SAA to maximise investment returns are permitted but they are limited to changes in allocation of asset categories covered by SAA only. The Company rebalances its portfolio on a quarterly basis so that the actual allocation of assets is not materially different from SAA.

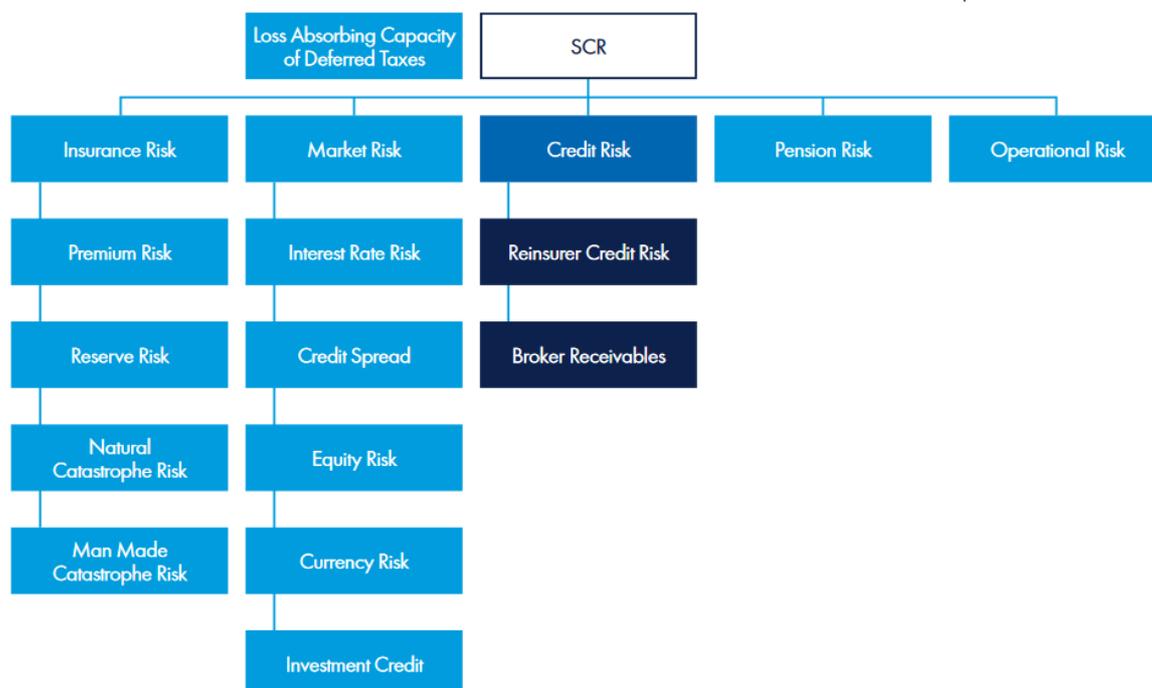
SAA implemented by IMA sets out the limits to avoid concentration of risks to a particular sector, issuer, currency, credit rating and country.

The Company holds a well-diversified portfolio due to aforementioned limits and it uses derivatives and collaterals for risk management purposes only.

### C.3 CREDIT RISK

Counterparty Default Risk (Credit Risk) is defined as the change in the value of assets and liabilities caused by unexpected default or deterioration in the credit standing of independent counterparties and debtors.

Counterparty Default Risk excludes investments and credit derivatives which are assessed within the Market Risk profile.



### CREDIT RISK EXPOSURE

Credit Risk is the risk that the value of a portfolio of assets and liabilities changes due to unexpected changes in the credit quality of issuers of assets, of a trading partner or a default of a third party in a credit insurance product.

Although modelled in other risk areas, the model does also include elements of Credit Risk:

- Asset Credit Risk (within Market Risk); and
- Trade Credit (within Insurance Risk).

The Company's exposure to Credit Risks is the fourth largest.

### MEASURES USED TO ASSESS CREDIT RISK

The Internal Model allows the explicit modelling of default and exposure to both reinsurance and broker counterparties. The Company assigns to each counterparty an internal rating with each counterparty modelled separately within the Internal Model.

The calibration of Probability of Defaults utilises information from the external credit rating agencies.

The calibration of Loss Given Default of each counterparty is carried out using a credibility theory approach which utilises both internal and external data.

The following Key Risk Indicators (KRI) are used by the Company to qualitative assess the credit risk:

KRIs	Description
Unexpected Credit Loss owing to Reinsurer failure	The Company faces a risk of material losses if its main reinsurers fail or are unable to pay their contractual share of claims payable. The Company's assessment of 'Unexpected Credit Loss owing to Reinsurer Failure' is 'Low'. Record capital levels of Reinsurers and strong underwriting profits up to this point have led to increasing equity being held in the market, thus reducing the risk of reinsurer failure.
Unexpected Credit Loss (all parties counterparty including group)	The Company faces a risk of material losses and cash flow issues if other internal (intra-group) or third party obligors are unable to pay amounts due and default in their commitments.
There are no material changes to the measures used to assess Credit Risk during the year 2018.	

### CREDIT RISK CONCENTRATION

Credit Risk concentration is associated with any single exposure or group of exposures with the potential to produce large losses to threaten the Company's core operations. It may arise either in the form of single name concentration or industry concentration.

The Company's most material Credit Risk concentration relates to reinsurance arrangements. The largest reinsurance balance is with AIG Group and the details of top five reinsurer balances, including those held with captive reinsurers are as follows:

Reinsurer Name	£m
American International Group, Inc.	815
HSBC Insurance Ltd	151
Marias Falls Insurance Company Ltd	139
Two Harbors Insurance Company	138
Euroguard Insurance Company Limited	126

Source: S.31.01 QRT

The amount of exposure to AIG group in particular is monitored on a regular basis and the solvency ratios of AIG group is subject to continuous assessment.

### CREDIT RISK MITIGATION TECHNIQUES

The Company has established an effective Credit Risk management framework that includes guidelines and processes to govern day-to-day credit risk-taking activities. The Company's Chief Credit Officer (CCO) and credit executives are primarily responsible for implementing and maintaining a risk management framework consistent with the Company's Credit Policy, and the Company's Credit Procedures.

The Company monitors and controls its company-wide Credit Risk concentrations and attempts to avoid unwanted or excessive risk accumulations, whether funded or unfunded. To minimise the level of Credit Risk in some circumstances, the Company may require third-party guarantees, reinsurance or collateral, such as letters of credit and trust collateral accounts. The Company treats these as credit exposures and includes them in its risk concentration exposure data. The Company also identifies its aggregate credit exposures to its underlying counterparty risks.

Credit Risk mitigation involves managing the approval process for requests for credit limits, program limits and credit transactions above authorities or where concentrations of risk may exist or be incurred. Credit Risks are managed and controlled by the Company's CCO through techniques listed below:

- Aggregating the Company's credit exposure data by counterparty, country, sector and industry and regularly

reporting and reviewing risk concentrations with senior management;

- Administering regular portfolio credit reviews of investment and credit-incurring business units and recommending corrective actions where required;
- Approving appropriate credit reserves and credit-related other-than-temporary impairments;
- Overseeing the submission of individual transactions with high unsecured credit exposures to the Company Large and Unusual Transactions Referral Group for its consideration; and
- Overseeing the Watch List process within the Company portfolios.

### PROCESS FOR MONITORING THE EFFECTIVENESS OF CREDIT RISK MITIGATION TECHNIQUES

Credit Risks are monitored through the governance structure. The Insurance Risk committee monitors and reports on the credit risks within Insurance business. The Reinsurance Committee, a sub-committee of the Insurance Risk committee, meets quarterly to manage, monitor and report the Credit Risks associated with reinsurance and broker balances within the Company. The committee adheres to its terms of reference with respect to its membership, chair, the frequency of meetings, and record keeping.

The Committees executes its responsibilities effectively by review of the Credit Risk profile against the risk appetite, and ad-hoc portfolio reviews. The Insurance Risk Committee also receives and comments on relevant Credit Risk content relating to the Economic capital model calibration, model validation and model outputs. Feedback and challenge is provided by the committee on these all of these reports.

Reinsurance recoverables are a key risk consideration for the Company. The Reinsurance Credit Department is dedicated to the management of reinsurance recoverables within AIG, and conducts the following principal control activities:

- Periodic detailed assessments of the financial strength and condition of current and potential reinsurers, both foreign and domestic;
- Monitoring both the financial condition of reinsurers as well as the total reinsurance recoverable ceded to reinsurers, and set limits with regard to the amount and type or exposure AIG is willing to take with reinsurers; and
- Reviews the nature of the risks ceded and the need for measures, including requiring collateral from active reinsurance counterparties, to mitigate Credit Risk.

## C.4 LIQUIDITY RISK

Liquidity refers to the ability to generate sufficient cash resources to meet the Company's payment obligations. It is defined as unencumbered cash and assets that can be monetized in a short period of time at a reasonable cost in both normal and stressed market conditions.

Liquidity Risk is defined as the risk that the Company's financial condition will be adversely affected by the inability or perceived inability to meet its short-term cash, collateral or other financial obligations. The failure to appropriately manage Liquidity Risk can result in reduced operating flexibility, increased costs, and reputational harm. Liquidity Risk has been categorised into:



### LIQUIDITY RISK EXPOSURE

**Market/Monetization Risk:** The risk that the assets cannot be readily transformed into cash due to unfavourable market conditions.

Market Liquidity Risk may limit the Company's ability to sell assets at reasonable values to meet liquidity needs.

- **Market/Monetization Risk:** Assets cannot be readily transformed into cash due to unfavourable market conditions. Market Liquidity Risk may limit the ability to sell assets at reasonable values to meet liquidity needs.
- **Cash Flow Mismatch Risk:** Discrete and cumulative cash flow mismatches or gaps over short-term horizons under both expected and adverse business conditions may create future liquidity shortfalls.
- **Event Funding Risk:** Additional funding is required as the result of a trigger event. Event Funding Risk comes in many forms and may result from a downgrade in credit ratings, a market event, or some other event that created a funding obligation or limits existing funding options.

The Expected Profits in Future Premiums for the Group are £602,305 as shown in QRT S.23.01.22.

### MEASURES USED TO ASSESS LIQUIDITY RISK

The Company's Treasury and ERM have developed "Standard Metrics" on the Company's short-term liquidity position, to assess liquidity risks. These Standard Metrics, as detailed below, are used in conjunction with 12-month liquidity stress testing to monitor liquidity position.

Metrics	Description
Short-term Cash Coverage Ratio	Measures the sufficiency of cash equivalents to meet immediate forecasted net cash flow needs over a two-week period
Liquid Coverage Ratio (LCR)	Provides a view into the sufficiency of liquid assets to meet forecasted net cash flow needs over various time horizons.
Cash Flow Forecast Variance Ratio	Provides a view into the performance of cash flow forecasts against actual experience over a defined time horizon.

There are no material changes to the measures used to assess liquidity during the year 2018.

### LIQUIDITY RISK CONCENTRATIONS

Liquidity Risk is impacted by the concentrations in both assets and liabilities. A concentration in assets can disrupt the Company's

ability to generate cash in times of illiquidity or reduced market liquidity for certain asset classes.

A liability concentration (or funding concentration) exists when the funding structure of the Company makes it vulnerable to a single event or a single factor, such as a significant and sudden withdrawal of funds or inadequate access to new funding.

The amount that represents a funding concentration is an amount that, if withdrawn by itself or at the same time as similar or correlated funding sources would require the institution to significantly change its day to day funding strategy.

The Company being predominantly a non-life insurer has made all of its financial investments in assets designated as available for sale except for loans and mortgages, and therefore, can be sold when needed. For the purpose of monitoring Liquidity Risk these are classified as available on demand or within one year and therefore, the largest concentration of assets is within one year maturity category.

Similarly, due to short-term and seasonal nature of the Company's business, most of the insurance related liabilities are due for payment within five years with the largest concentration of insurance liabilities in its second year. Under Solvency II regime the insurance liabilities are split into two components namely, the Best Estimate Technical Provision and Risk Margin (see section D for details).

### LIQUIDITY RISK MITIGATION TECHNIQUES

The Company has established an effective Liquidity Risk management framework which is guided by the Liquidity Risk tolerance as set forth by the Statement of Risk Appetite approved by the Board.

The purpose of the framework is to establish minimum liquidity requirements that protect the Company's long-term viability and ability to fund its ongoing business and meet short-term financial obligations in a timely manner in both normal and stressed conditions.

Liquidity Risk is mitigated through investment in predominately liquid financial assets and constant monitoring of expected asset and liability maturities.

The Company further manages this risk through reviews of Liquidity Risk Management Reports provided by the Treasury function as well as review and approval of stress scenarios designed by Treasury to assess the liquidity risk of the Company in extreme situations.

The Company's Treasury department is also operationally responsible for ensuring that sufficient funding required for a stressed scenario is available and that the sources of funding are appropriately diversified. Also, the Treasury department maintains a

Contingent Funding Plan that is triggered in the event of breaches in the Liquidity Risk limits.

AIG Liquidity Management Policy prescribes procedures to maintain sufficient liquidity to meet the obligations as they become due and the Company complies with this policy.

The Company risk appetite is set to maintain defined target liquid asset levels under both baseline and stressed conditions.

#### **PROCESS FOR MONITORING THE EFFECTIVENESS OF LIQUIDITY RISK MITIGATION TECHNIQUES**

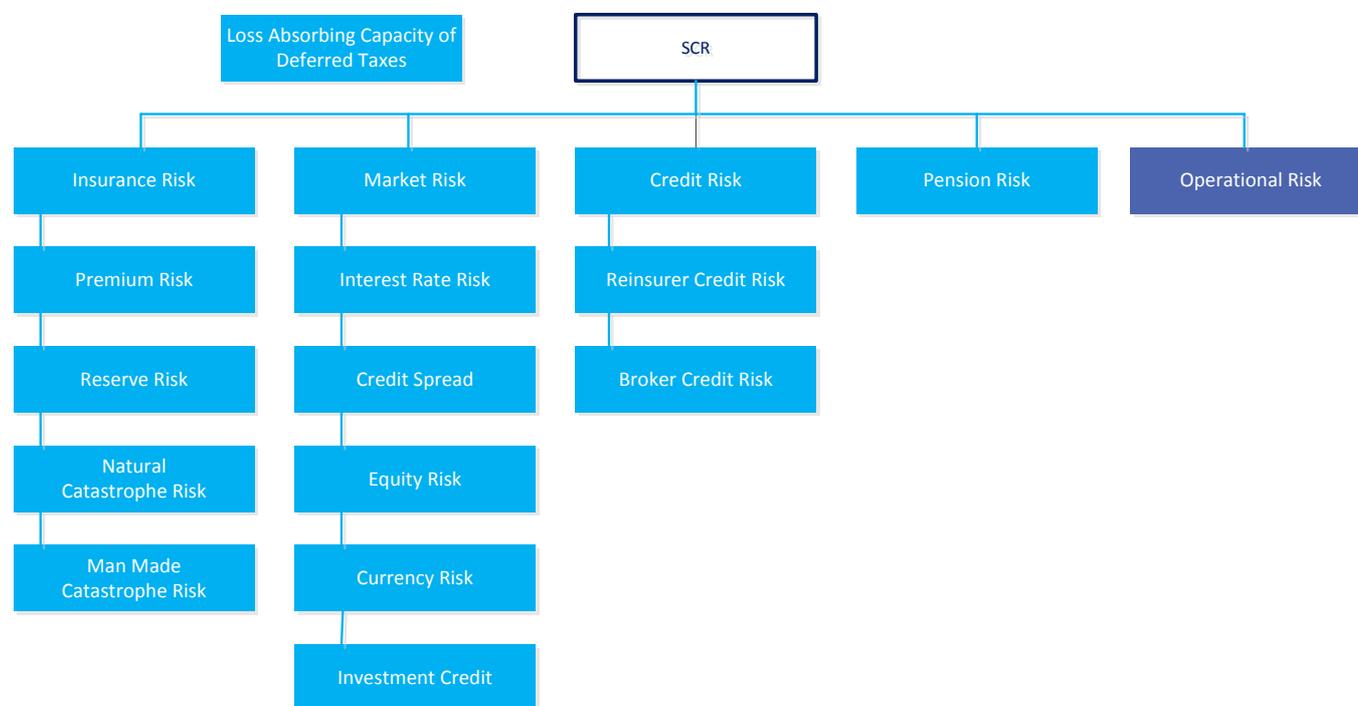
The Company has established a Liquidity Risk Management Framework which is guided by the Liquidity Risk Tolerance as set forth by the Statement of Risk Appetite approved by the Board. The

purpose of the framework is to establish minimum liquidity requirements that protect the Company's long-term viability and ability to fund its ongoing business and meet short-term financial obligations in a timely manner in both normal and stressed conditions. The Company's Liquidity Risk Management team is responsible for the implementation of this framework whereas, the MRC are responsible for monitoring the Liquidity Risk through a range of responsibilities. These include meeting at least quarterly to manage, monitor and report on the Liquidity risks within the Company. The MRC executes its responsibilities effectively by review of the liquidity risk profile against its present risk appetite as well as reviewing key risk exposures.

### C.5 OPERATIONAL RISK

Operational risk is defined as the risk of loss, or other adverse consequences, resulting from inadequate or failed internal processes, people, systems or external events.

Operational Risk is considered a key risk area of the Company and it is inherent in each of its business units. Operational risks can have many impacts, including but not limited to unexpected economic losses or gains, reputational harm due to negative publicity, regulatory action from supervisory agencies, operational and business disruptions and damage to customer relationships.



### OPERATIONAL RISK EXPOSURES

The Company's exposure to Operational Risks is the third largest risk type. The Company has the exposure to the following types of Operational risk:

Operational Risk Components	Description
IT system disruptions	The risk of IT systems or applications failing or not performing reliably (includes application development, infrastructure maintenance and DR capability).
Outsourcing and Third party performance and engagement	The risk that third party capabilities and SLAs do not match business requirements and expose the company to unintended risk. Also includes errors and delays in the on-boarding of new vendors and business partners.
Legal & Regulatory risk	Applies to local non-US insurance rules & regulations and the failure of adhering to them.
Business Disruption & Systems Failure	Risks associated with the interruption of business activity due to system or communication failures, the inaccessibility of information or the unavailability of utilities.
Financial reporting misstatements	This is the risk of financial statements containing material misstatements and/or errors in tax accounting.
Claims	The risk of inadequate handling of claims by the company resulting in claims leakage or inappropriate denials.
Staffing resources	The risk of losses arising due to insufficient capability of staff resources (includes the failure to provide a safe environment for employees).
Fraud	Risk of loss due to fraud perpetrated internally or externally.
Administration execution	Covers execution administration errors in policy servicing (timeliness, incorrect data, communication breakdowns), leading to customer detriment, reputational and operational impacts.

Operational Risk Components	Description
Cyber	The risk of cyber-attacks leading to information theft & denial of service.
Project execution	Covers the risk of program execution failure with large projects not delivered correctly, on time, on budget, or causing other unforeseen impacts or errors. Also includes the risk of the incorrect prioritisation of projects.
Reinsurance	Risk of loss due to inadequate reinsurance processes. Includes the failure of placing reinsurance when requested.
Receivables	Risk of not recovering receivables from brokers, policy holders and other applicable debtors.
Business continuity	The risk of ineffective business continuity plans negatively impacting company operations as a result of natural disasters, political events, terrorism or accidents.
Data	The risk that required data is not sufficiently available or of high enough quality (both because of systems and supporting processes) to support business decisions.
Conduct risk	The risk of not ensuring fair customer outcomes through the product life cycle, both from internal or external (outsourced) processes. The risk overlaps with other key risks (e.g. data quality, programme execution, TPA management, claims, Data Privacy, Cyber, Local insurance rules, product design).
Modelling risk	The risk of errors or deficiencies in the data used to build models, flawed assumption, choice of specification, or undue influence of outliers caused by human error. Also includes the lack of a model.
M&A	Risks associated with mergers and acquisitions and more specifically the prospect of insufficient due diligence before finalised M&A's.

#### MEASURES USED TO ASSESS OPERATIONAL RISK

Operational Risk is modelled through the development of a representative set of adverse scenarios, which are then used to model the Company's Operational Risk Profile.

The scenarios are created and developed in subject matter expert workshops with representatives from both first line (Underwriting, Claims, Operations) and Second Line of Defence (ERM).

Three data points are defined for each scenario, setting out a frequency (return period) and expected impact. These data points are then used to create loss distributions for each scenario and in turn are used to calibrate the Internal Model Operational Risk Module.

The following metrics are used by the Company to qualitative assess the Operational Risk:

Operational Risk Components	Metrics
IT system disruptions	Report of IT systems or applications fail or do not perform reliably
Outsourcing and Third party performance and engagement	Risk Events, CBRA Report
Legal & Regulatory risk	Number of Privacy Risk Incidents / Escalations
Business Disruption & Systems Failure	Outage Systems and Outage Duration Report
Financial reporting misstatements	Late Fillings Report
Claims	Closed file reviews, Declined Ratios, Complaints Claim Handling Report
Staffing resources	Headcount Report
Fraud	Number of internal fraud cases, Gross loss from internal fraud
Administration execution	SLA Report
Cyber	Number of attacks, Malware detected
Project execution	Large Projects Execution Report
Reinsurance	Bound not booked report, Internal Treaty, External Treaty, Fac / Captive spend
Receivables	Open Receivables Report
Business continuity	BIA/ BCP Assessment Report

Data	Data Quality and Availability Report
Conduct risk	Complaint Management Report

During 2018 the Company updated the list of Operational Risk components used to monitor Operational Risk.

### OPERATIONAL RISK CONCENTRATION

When viewed on a standalone basis, the largest Operational Risks AH&L is exposed to are the group contagion/reputational risks where a downgrade in AIG Inc credit rating could have a significant impact on client relationships. Other significant Operational Risks include financial integrity, failure in application of reinsurance and breach of underwriting authority.

### OPERATIONAL RISK MITIGATION TECHNIQUES

The Company's Operational Risk is primarily controlled through adherence to regional procedures which set out the territory specific controls in place to comply with AIG's centrally defined corporate policies. The Company monitors the appropriate application of these controls through adherence to the AIG Operational Risk Management (ORM) Framework.

AIG's Group's ORM Framework, which the Company aligns to, facilitates the identification, assessment, monitoring, and measurement of operational risk and promotes a culture where each employee has responsibility for managing Operational Risk. The ORM Framework establishes a structure within which the ORM process evolves commensurate with changes in the regulatory and business environment.

### PROCESS FOR MONITORING THE EFFECTIVENESS OF OPERATIONAL RISK MITIGATION TECHNIQUES

ERM and management have worked together to continue enhancement of the operational risk framework in the Company.

The Risk Event reporting process for the Company is further enhanced in its journey to maturity. ORM's focus is on awareness and it is delivered through multiple training and awareness sessions with senior management, including lunch & learns with staff. Additional "tone from the top" messages are initiated from senior management, including a "raise your hand" campaign by the CEO of the Company, and messages from the President of AIG to again confirm the need for all employees to raise risk events.

The analysis of risk events was enhanced through monthly risk event forums (across the region, as well as with global ORM colleagues). The network of risk champions is also in place with their main goal to support the identification and reporting of risk events in their business units.

ORM reviews all risk events reported and communicate management actions for significant events, to all relevant Governance forums and committees.

Risk identification is further supported by the execution of Risk and Control Self-Assessments across the Company. These involved workshops facilitated by ORM and covered all processes within the target business unit. The process is continuously reviewed for further simplification and standardisation.

ORM conducts an independent validation of the operational risk component of the Company's internal capital model and it leads to a comprehensive review and refresh of key scenarios and the library of key Operational Risks for the Company, aligning this to a global top-down risk assessment.

## C.6 RISK SENSITIVITIES

The Company conducts various tests to identify the implications of a wide-range of risks within the Stress and Scenario Testing Framework.

This ensures that potential adverse scenarios are considered and negative outcomes can be adequately mitigated either through controls implemented in advance or through timely remedial measures.

Stress and Scenario Testing (including Reverse Stress Testing) is a key risk management tool used within the Company alongside the Company's Economic Capital Model (ECM). The Company also conducts reverse stress tests on an annual basis that examine the conditions that would render the Company business model unviable.

The details of various SSTs are as follows:

Types of SSTs	Risks covered	Timeline
Business Plan SST	All material risks over 1 year planning period	Performed annually
Reverse Stress Testing (RST)	All material risks over 5 years planning period	Performed annually
	Solvency/Capital RSTs	
	Liquidity RSTs	
Risk Specific SST	Reputational & Strategic RSTs	Performed monthly
	Liquidity Risks	
Regulatory SST	Securitisation Stress Testing	Performed quarterly
	PRA General Insurance Stress Test (GIST)	Performed every two years (odd years)
	EIOPA	Performed every two years (even years)
Strategic planning SSTs	Federal Reserve (CCAR Stress Testing)	Performed annually
Emerging Risks SSTs	All Risks	Performed annually

## STRESS TESTS AND SENSITIVITIES

In order to monitor the impact of sensitivity of material risks and events on the Company's risk profile and SII Surplus, the Company has performed the following stress tests as reported in the Company's 2018 ORSA report.

These tests were performed using business planning data from the Company's 2019 Business Plan and 2019 Capital Plan that were based on 2Q18 actual with 6 months forecast and hereon with defined as the Base Position 2019 for the purpose of this section.

As AEL was dissolved in 1<sup>st</sup> December 2018 the following section is based on AIG UK's information.

The details of methods, assumptions and outcome of these tests are detailed below.

### A. Brexit

The main risks to our ability to operate under a hard-Brexit have been mitigated through the creation of AIG UK and AESA. However, the terms of Britain's exit from the EU, including any transitional arrangements and/or the new deal with the EU, may have an impact on our business in 2019 and beyond. Where the risk that remains is a significant recession and / or increased inflation in the UK economy, triggering "economic downturn" outcomes.

A failure to resolve the terms of Britain's Exit from the EU in a timely way may also precipitate greater domestic political instability and shocks to the markets arising from a change in government, especially where that government has no majority, or adopts a radically different set of policies.

The company analysed the impact of Brexit on the UK being worse than expected.

### Methods and assumptions

The details of risks impacted by the scenario and methods and assumptions used to assess the impact of this scenario on relevant risks are as follows:

Risks in scope	Methods and Assumptions
Insurance Risk: Losses relating to inflation- and GDP-sensitive lines of business	<p>Brexit impact on the UK:</p> <ul style="list-style-type: none"> <li>Inflation 3% higher than expected, producing an increase to existing returns.</li> <li>Higher than expected inflation is reflected in future premiums leading to a higher future-year loss ratio for inflation-sensitive lines of business.</li> <li>GDP is hit harder than expected resulting in a 5% increase in LR for D&amp;O, Surety and Trade Credit.</li> </ul> <p>Assumptions</p> <ul style="list-style-type: none"> <li>Inflation shock produces increase in existing reserves; this increase runs off at the same rate as the existing pre-shock reserves.</li> <li>Premium rates are adjusted for the inflation shock but the impact of the rate adjustments does not emerge until midway through year 2.</li> </ul> <p>Premium rates are adjusted for the GDP shock but the impact of the rate adjustments does not emerge until midway through year 2.</p>

## Outcome

The results of this scenario are set out below. As it can be seen there was no capital breach over the three year business planning period.

	Base Position 2018	2019	2020	2021
Base Scenario SII Ratio (%)	131%	137%	145%	153%
Brexit Scenario SII Ratio (%)	117%	125%	135%	146%

## B. Synchronised Cyber Attack

Cyber risk is an on-going risk that the AIG UK Board and regulator have been monitoring and hence has been selected as the basis for stressing the AIG UK entity across the horizon of the business plan.

The company has selected a scenario where multiple companies are impacted by an operating system hack. The attack results in business interruption and data breaches.

### Methods and assumptions used

The details of risks impacted by the scenario and methods and assumptions used to assess the impact of this scenario on relevant risks are as follows:

Risks in scope	Methods and Assumptions
Insurance Risk: Losses relating to multiple lines of business affected by the attack.	<p>AIG UK incurs the following losses:</p> <ul style="list-style-type: none"> <li>Insurance cost on Cyber LoB</li> <li>Insurance cost due to secondary impact on non-cyber LoBs (e.g. business interruption)</li> <li>Loss of business for data-sensitive LoBs due to reputational impact (Cyber, M&amp;A, K&amp;R, Consumer Property, Consumer Auto)</li> </ul> <p>Assumptions:</p> <ul style="list-style-type: none"> <li>Gross Cyber loss estimated as the sum of the policy limits for the top 7 cyber accounts.</li> <li>Secondary impact estimated from the Cyber MMC scenario.</li> <li>Estimated claims cost reflected in immediate increase in reserves and SCR; runs off over next three years.</li> </ul>
Operational Risk: AIG UK subject to a breach of IT Security, key system outage and data theft.	<p>AIG UK incurs the following losses:</p> <ul style="list-style-type: none"> <li>Operational risk loss: impact on AIG's systems</li> <li>Operational risk loss: fine for failing to implement effective security measures</li> </ul> <p>Assumptions:</p> <ul style="list-style-type: none"> <li>Operational risk loss and loss of business due to reputational damage has minimal impact on SCR but impacts the own funds through impact on future P&amp;L.</li> <li>Operational Risk loss estimated as the 1-in-7 loss from the 2017 IT Systems Failure scenario calibration.</li> <li>AIG UK is assumed to receive a £17m regulatory fine from the data breach. (In Oct-18 it was announced that TESCO Bank received a fine of £16.4m for a similar event.)</li> </ul>

## Outcome

The results of this scenario are set out below. As it can be seen there was no capital breach over the three year business planning period.

	Base Position 2018	2019	2020	2021
Base Scenario SII Ratio (%)	131%	137%	145%	153%
Cyber Scenario SII Ratio (%)	113%	118%	136%	150%

## C. Large Cross-Lines Event

The Company has selected a scenario that considers an event similar to Grenfell (UK, 2017).

### Methods and assumptions used

The details of risks impacted by the scenario and methods and assumptions used to assess the impact of this scenario on relevant risks are as follows:

Risks in scope	Methods and Assumptions
Insurance Risk: Losses relating to multiple lines of business.	<p>AIG UK incurs the following losses:</p> <ul style="list-style-type: none"> <li>£25m Casualty loss: public liability for injuries/deaths</li> <li>£50m Property loss: damage to the tower</li> <li>£50m D&amp;O loss: failure on behalf of the manufacturer of the defective building product</li> <li>£25m Product Liability: manufacturer of the defective building material</li> <li>£25m Commercial PI: architects and engineers involved in the building design</li> </ul> <p>Assumptions:</p> <ul style="list-style-type: none"> <li>Produces an immediate increase in reserves which run-off over the next three years</li> </ul>

## Outcome

The results of this scenario are set out below. As it can be seen there was no capital breach over the three year business planning period.

	Base Position 2018	2019	2020	2021
Base Scenario SII Ratio (%)	131%	137%	145%	153%
Large Cross-Lines Event Scenario SII Ratio (%)	121%	125%	142%	153%

## D. Large Losses and PYD

The company has selected a scenario that considers an event occurring that affects significant large losses occurring across multiple lines of business and affecting prior-year development.

### Methods and assumptions used

The details of risks impacted by the scenario and methods and assumptions used to assess the impact of this scenario on relevant risks are as follows:

Risks in scope	Methods and Assumptions
Insurance Risk: Losses relating to multiple lines of business.	<p>AIG UK incurs the following losses:</p> <ul style="list-style-type: none"> <li>£100m of large losses are experienced across multiple LoBs.</li> <li>£250m (1:7 reserve risk) of prior-year development are causing reserve increases across multiple LoBs.</li> </ul> <p>Assumptions:</p> <ul style="list-style-type: none"> <li>Increase in reserves from large losses are run off within the three-year horizon</li> <li>Increase in reserves due to PYD are run off at the same rate as the pre-shock reserves</li> </ul>

### Outcome

The results of this scenario are set out below. As it can be seen there was no capital breach over the three year business planning period.

	Base Position 2018	2019	2020	2021
Base Scenario SII Ratio (%)	131%	137%	145%	153%
Large Loss and PYD Scenario SII Ratio (%)	110%	117%	135%	147%

### E. European Windstorm Event

The Company has selected a scenario that considers a material European Windstorm event occurring. European Windstorm events affect the natural catastrophe risk profile of the Company, which has a material impact on the capital need of the UK entity. When modelled, allowance was made for the proposed reinsurance strategy to reduce the Nat Cat exposure.

### Methods and assumptions used

The details of risks impacted by the scenario and methods and assumptions used to assess the impact of this scenario on relevant risks are as follows:

Risks in scope	Methods and Assumptions
Insurance Risk: Losses arising from AIG UK's Property and Energy book.	<p>Material European Windstorm event:</p> <ul style="list-style-type: none"> <li>Occurs at t=0</li> <li>1:100 event (18Q1 Nat Cat data)</li> </ul> <p>Assumptions:</p> <ul style="list-style-type: none"> <li>Produces increase in reserves which runs off over the following year</li> </ul>

### Outcome

The results of this scenario are set out below. As it can be seen there was no capital breach over the three year business planning period.

	Base Position 2018	2019	2020	2021
Base Scenario SII Ratio (%)	131%	137%	145%	153%
European Windstorm Scenario SII Ratio (%)	113%	128%	145%	153%

### F. UK Flood

The Company has selected a scenario that considers a material UK flood event occurring. UK flooding affects the natural catastrophe risk profile of the Company, which has a material impact on the capital need of the UK entity. When modelled, allowance was made for the proposed reinsurance strategy to reduce the Nat Cat exposure.

### Methods and assumptions used:

The details of risks impacted by the scenario and methods and assumptions used to assess the impact of this scenario on relevant risks are as follows:

Risks in scope	Methods and Assumptions
Insurance Risk: Losses arising from AIG UK's Property and Marine book.	<p>Material UK Flood event</p> <ul style="list-style-type: none"> <li>Occurs at t=0</li> <li>1:100 event (18Q1 Nat Cat data)</li> </ul> <p>Assumptions:</p> <ul style="list-style-type: none"> <li>Produces increase in reserves which runs off over the following year</li> </ul>

### Outcome

The results of this scenario are set out below. As it can be seen there was no capital breach over the three year business planning period.

	Base Position 2018	2019	2020	2021
Base Scenario SII Ratio (%)	131%	137%	145%	153%
UK Flood Scenario SII Ratio (%)	109%	125%	145%	153%

## C.7 OTHER MATERIAL RISKS

### **Pension Risk**

Pension Risk is deemed only to exist for AIG on defined benefit (final salary) schemes. AIG is responsible for both Market and Mortality Risk. It is 'defined' in the sense that the benefit formula is defined and known in advance. Pension risk is mitigated through capital setting as it is modelled within the Company's internal model.

### **Technology Risk**

Stable, reliable and updated systems are important to underpin the successful execution of the company's business plan, and enhance automated controls. The following key technology risk themes are monitored: Production Stability and Resilience, Cyber Security, Application Functionality to support business objectives and the impact of organisational restructuring to form AIG UK.

The Technology Risk team provides regional oversight, governance and reporting with regards to IT security, risk management and compliance in line with internal corporate and regulatory requirements. The team also manages the regional engagement in regulatory dialogue on technology issues. Technology risk is mitigated through capital setting as it is modelled within the Company's internal model as part of Operational Risk.



## Solvency & Financial Condition Report 2018

### D. Valuation for Solvency Purpose

The 'Valuation for Solvency Purposes' section of the report describes the valuation of assets, technical provisions and other liabilities from IFRS basis to Solvency basis. The section also outlines the approach and methodology underlying the valuation.

**KEY ELEMENTS OF THE SECTION ARE:**

- Assets;
- Technical Provisions (TPs);
- Other Liabilities; and
- Any other information.

Please note that the tables in this section need to align to the QRTs included in the Appendix of this Report. Rounding differences may arise when trying to recalculate the figures quoted in the tables but in order to maintain consistency with the QRTs we have decided to maintain the rounding referenced in the QRTs.

## VALUATION FOR SOLVENCY PURPOSES

### EUROPEAN GROUP

In accordance with Article 75 of the Solvency II Directive, the European Group's assets and liabilities other than technical provisions are measured in accordance with principles of an arm's length transaction between knowledgeable willing parties using market consistent valuation methods. In the absence of quoted market prices in an active market, the holdings of non-controlling interest in participations are included using the adjusted equity method.

The table below sets out the summarised balance sheet as at 30<sup>th</sup> November 2018, comparing assets and liabilities reported in the AHEL standalone IFRS accounts and the European Group Solvency II balance sheet. AHEL has taken advantage of the exemption provided by section 401 of Companies Act 2006 from the requirement to produce consolidated IFRS financial statements.

Solvency II Balance Sheet as at 30 November 2018, £	Notes	Unaudited AHEL YE 2018 Management Accounts £'m	Solvency II EBS Consolidated YE 2018 £'m	Solvency II EBS Consolidated YE 2017 £'m
<b>Assets</b>				
Deferred acquisition costs	8	0.0	0.0	0.0
Intangible assets	9	0.0	0.0	0.0
Deferred tax assets	7	0.0	142.3	171.1
Pension benefit surplus	10	0.0	33.9	31.00
<b>Property, plant &amp; equipment held for own use</b>	<b>6</b>	<b>0.0</b>	<b>141.5</b>	<b>147.5</b>
<b>Investments</b>	<b>1</b>	<b>5,033.4</b>	<b>10,457.41</b>	<b>10,430.0</b>
Property (other than for own use)		0.0	0.0	177.5
Participations		5,033.4	139.64	0.3
Equities		0.0	4.81	6.4
Equities - listed		0.0	0.00	0.0
Equities - unlisted		0.0	4.81	6.4
<b>Bonds</b>		<b>0.0</b>	<b>10,233.76</b>	<b>10,071.8</b>
Government Bonds		0.0	3,606.75	4,104.3
Corporate Bonds		0.0	6,627.01	5,940.5
Structured notes		0.0	0.00	1.9
Collateralised securities		0.0	0.00	25.1
Investment funds		0.0	78.96	44.6
Deposits other than cash equivalents		0.0	0.24	129.4
Other Investments		0.0	0.0	0.0
<b>Loans &amp; mortgages</b>	<b>2</b>	<b>0.0</b>	<b>393.86</b>	<b>460.0</b>
Loans and mortgages to individuals		0.0	0.42	0.0
Other loans & mortgages		0.0	393.44	459.6
Loans on policies		0.0	0.0	0.0
<b>Reinsurance recoverable from:</b>	<b>D.2</b>	<b>0.0</b>	<b>3,450.5</b>	<b>2,581.5</b>
Non-life excluding health		0.0	2,824.45	2,204.9
Health similar to non-life		0.0	2.28	8.3
Life excluding Health and index-linked and unit-linked		0.0	623.77	368.3
Insurance & intermediaries receivables	11	0.0	34.01	30.6
Reinsurance receivables	4	0.0	298.32	227.1
Receivables (trade, not insurance)	3	11.5	478.07	514.2
Cash and cash equivalents	5	0.11	814.62	486.2
<b>Total assets</b>		<b>5,045.01</b>	<b>16,244.50</b>	<b>15,079.2</b>

Solvency II Balance Sheet as at 30 November 2018, £	Notes	Unaudited AHEL YE 2018 Management Accounts £'m	Solvency II EBS Consolidated YE 2018 £'m	Solvency II EBS Consolidated YE 2017 £'m
<b>Liabilities</b>				
<b>Technical Provisions</b>	D.2			
Technical provisions – non-life		0.0	(11,447.30)	(10,244.7)
Non-life excluding health		0.0	(11,128.49)	(9,901.3)
Health similar to non-life		0.0	(318.81)	(343.4)
Technical provisions – life		0.0	(477.57)	(279.4)
<b>Liabilities other than Technical Provisions</b>				
Provisions other than technical provisions	13	0.0	(75.85)	(89.3)
Pension benefit obligations	14	0.0	(115.64)	(124.4)
Deposits from reinsurers	17	0.0	(58.97)	(57.6)
Deferred tax liabilities	16	0.0	(68.49)	(96.2)
<b>Derivatives</b>				
Debts owed to credit institutions		0.0	(0.01)	(53.8)
Insurance & intermediaries payables		0.0	(5.59)	(4.7)
Reinsurance payables	18	0.0	(92.86)	(49.9)
Payables (trade, not insurance)	12	(3.62)	(458.70)	(663.7)
Subordinated liabilities	15	(300.0)	(300.00)	(1,150.00)
Subordinated liabilities not in BOF		0.0	0.0	(12.8)
Subordinated liabilities in BOF		0.0	(300.0)	(1,137.2)
<b>Total Liabilities</b>		<b>(303.62)</b>	<b>(13,100.98)</b>	<b>(12,813.7)</b>
<b>Excess of Assets over Liabilities</b>		<b>4,741.39</b>	<b>3,143.51</b>	<b>2,265.5</b>

**METHOD OF CONSOLIDATION**

The European Group Solvency II balance sheet has been prepared using the default accounting consolidation method (Method 1).

The European Group and the majority of its subsidiaries have a 30<sup>th</sup> November year end, however AIG Life, AIG Israel and Laya Healthcare have a 31<sup>st</sup> December year end. For the YE2018 European Group Solvency II Balance Sheet, the latter group of entities are consolidated using their financials as at 30<sup>th</sup> September 2018.

## AIG EUROPE LIMITED

In accordance with Article 75 of the Solvency II Directive, the AEL's assets and liabilities are fair valued based on principles of an arm length transaction between knowledgeable willing parties.

Solvency II Balance Sheet as at 30 November 2018	Notes	IFRS YE 2018 £'m	Solvency II Reclassification YE 2018 £'m	Solvency II Adjustment YE 2018 £'m	Solvency II EBS YE 2018 £'m	Solvency II EBS YE 2017 £'m
<b>Assets</b>						
Deferred acquisition costs	8	313.5	0.0	(313.5)	0.0	0.0
Intangible assets	9	12.9	0.0	(12.9)	0.0	137.0
Deferred tax assets	7	85.1	(9.6)	41.0	116.5	31.0
Pension benefit surplus	10	33.9	0.0	0.0	33.9	0.0
<b>Property, plant &amp; equipment held for own use</b>	6	131.3	0.0	0.0	131.3	136.8
<b>Investments</b>	1	9,834.7	81.0	13.6	9,929.3	9,822.9
Property (other than for own use)		0.0	0.0		0.0	0
Participations		47.2	0.0	155.4	202.5	118.6
Equities		0.0	0.0	4.8	4.8	6.4
Equities – listed		0.0	0.0	0.0	0.0	0.0
Equities – unlisted		0.0	0.0	4.8	4.8	6.4
<b>Bonds</b>		9,787.6	81.0	(150.3)	9,718.2	9,577.9
Government Bonds		9,787.6	19.8	(6,445.0)	3,362.4	3,862.7
Corporate Bonds		0.0	61.2	6,294.7	6,355.9	5,689.6
Structured notes		0.0	0.0	0.0	0.0	1.9
Collateralised securities		0.0	0.0	0.0	0.0	23.7
Investment funds		0.0	0.0	3.7	3.7	3.8
Deposits other than cash equivalents		0.0	0.0	0.0	0.0	116.3
<b>Loans &amp; mortgages</b>	2	392.0	3.2	(1.7)	393.4	521.3
Other loans & mortgages		392.0	3.2	(1.7)	393.4	0.0
<b>Reinsurance recoverable from:</b>	D.2	3,387.8	0.0	(687.9)	2,699.9	2,094.3
Non-life excluding health		3,387.8	0.0	(698.0)	2,699.9	2,074.4
Health similar to non-life		0.0	0.0	2.3	2.3	8.3
Life excluding Health and index-linked and unit-linked		0.0	0.0	7.8	7.8	11.6
Insurance & intermediaries receivables	11	1,280.6	(1,247.7)	0.0	32.9	29.9
Reinsurance receivables	4	296.2	0.0	0.0	296.2	223.9
Receivables (trade, not insurance)	3	499.9	(84.1)	0.0	415.8	417.4
Cash and cash equivalents	5	647.8	0.0	0.0	647.8	329.3
<b>Total assets</b>		<b>16,915.6</b>	<b>(1,257.2)</b>	<b>(961.2)</b>	<b>14,697.1</b>	<b>13,744.0</b>

Solvency II Balance Sheet as at 30 November 2018	Notes	IFRS YE 2018 £'m	Solvency II Reclassification YE 2018 £'m	Solvency II Adjustment YE 2018 £'m	Solvency II EBS YE 2018 £'m	Solvency II EBS YE 2017 £'m
<b>Liabilities</b>						
<b>Technical Provisions</b>	D.2					
Technical provisions – non-life		(12,458.9)	548.3	756.9	(11,153.6)	(9,960.6)
Non-life excluding health		(12,458.9)	548.3	1,066.2	(10,844.3)	(9,623.5)
Health similar to non-life		0.0	0	(309.3)	(309.3)	(337.1)
Technical provisions – life		0.0	0.0	(68.0)	(68.0)	(107.3)
<b>Liabilities other than Technical Provisions</b>		0.0	0.0	0.0	0.0	0.0
Provisions other than technical provisions	13	(75.8)	0.0	0.0	(75.8)	(89.3)
Pension benefit obligations	14	(60.5)	0.0	0.0	(60.5)	(70.2)
Deposits from reinsurers	17	(4.9)	0.0	0.0	(4.9)	(4.8)
Deferred tax liabilities	16	(37.0)	9.6	(5.1)	(32.6)	(44.5)
Insurance & intermediaries payables		(92.6)	92.6	0.0	0.0	(0.4)
Reinsurance payables	18	(598.7)	515.5	83.2	0.0	0.0
Payables (trade, not insurance)	12	(428.7)	91.3	0.0	(337.4)	(394.8)
Subordinated liabilities	15	0.0	0.0	0.0	0.0	(50.0)
Subordinated liabilities not in BOF		0.0	0.0	0.0	0.0	(12.8)
Subordinated liabilities in BOF		0.0	0.0	0.0	0.0	(37.2)
<b>Total Liabilities</b>		<b>(13,757.2)</b>	<b>1,257.2</b>	<b>767.0</b>	<b>(11,732.9)</b>	<b>(10,721.8)</b>
<b>Excess of Assets over Liabilities</b>		<b>3,158.5</b>	<b>0.0</b>	<b>(194.2)</b>	<b>2,964.2</b>	<b>3,022.2</b>

## AMERICAN INTERNATIONAL GROUP UK LIMITED

In accordance with Article 75 of the Solvency II Directive, AIG UK's assets and liabilities are fair valued based on principles of an arm length transaction between knowledgeable willing parties:

Solvency II Balance Sheet as at 30 November 2018	Notes	UK GAAP YE 2018 £'m	Solvency II Reclassification YE 2018 £'m	Solvency II Adjustment YE 2018 £'m	Solvency II EBS YE 2018 £'m	Unaudited Solvency II EBS YE 2017 £'m
<b>Assets</b>		0.0	0.0	0.0	0.0	0.0
Deferred acquisition costs	8	0.0	0.0	0.0	0.0	0.0
Intangible assets	9	0.0	0.0	0.0	0.0	0.0
Deferred tax assets	7	0.0	0.0	0.0	0.0	0.0
Pension benefit surplus	10	0.0	0.0	0.0	0.0	0.0
<b>Property, plant &amp; equipment held for own use</b>	6	0.0	0.0	0.0	0.0	0.0
<b>Investments</b>	1	0.0	0.0	0.0	0.0	0.0
Property (other than for own use)		0.0	0.0	0.0	0.0	0.0
Participations		0.0	0.0	0.0	0.0	0.0
Equities		0.0	0.0	0.0	0.0	0.0
Equities - listed		0.0	0.0	0.0	0.0	0.0
Equities - unlisted		0.0	0.0	0.0	0.0	0.0
<b>Bonds</b>		0.0	0.0	0.0	0.0	0.0
Government Bonds		0.0	0.0	0.0	0.0	0.0
Corporate Bonds		0.0	0.0	0.0	0.0	0.0
Structured notes		0.0	0.0	0.0	0.0	0.0
Collateralised securities		0.0	0.0	0.0	0.0	0.0
Investment funds		0.0	0.0	0.0	0.0	0.0
Deposits other than cash equivalents		0.0	0.0	0.0	0.0	0.0
<b>Loans &amp; mortgages</b>	2	0.0	0.0	0.0	0.0	0.0
Other loans & mortgages		0.0	0.0	0.0	0.0	0.0
<b>Reinsurance recoverable from:</b>	D.2	0.0	0.0	0.0	0.0	0.0
Non-life excluding health		0.0	0.0	0.0	0.0	0.0
Health similar to non-life		0.0	0.0	0.0	0.0	0.0
Life excluding Health and index-linked and unit-linked		0.0	0.0	0.0	0.0	0.0
Insurance & intermediaries receivables	11	0.0	0.0	0.0	0.0	0.0
Reinsurance receivables	4	0.0	0.0	0.0	0.0	0.0
Receivables (trade, not insurance)	3	0.04	0.0	0.0	0.04	0.0
Cash and cash equivalents	5	3.70	0.0	0.0	3.70	0.0
<b>Total assets</b>		<b>3.74</b>	<b>0.0</b>	<b>0.0</b>	<b>3.74</b>	0.0

Solvency II Balance Sheet as at 30 November 2018	Notes	UK GAAP YE 2018 £'m	Solvency II Reclassification YE 2018 £'m	Solvency II Adjustment YE 2018 £'m	Solvency II EBS YE 2018 £'m	Unaudited Solvency II EBS YE 2017 £'m
<b>Liabilities</b>						
<b>Technical Provisions</b>	D.2	0.0	0.0	0.0	0.0	0.0
Technical provisions – non-life		0.0	0.0	0.0	0.0	0.0
Non-life excluding health		0.0	0.0	0.0	0.0	0.0
Health similar to non-life		0.0	0.0	0.0	0.0	0.0
Technical provisions – life		0.0	0.0	0.0	0.0	0.0
<b>Liabilities other than Technical Provisions</b>		0.0	0.0	0.0	0.0	0.0
Provisions other than technical provisions	13	0.0	0.0	0.0	0.0	0.0
Pension benefit obligations	14	0.0	0.0	0.0	0.0	0.0
Deposits from reinsurers	17	0.0	0.0	0.0	0.0	0.0
Deferred tax liabilities	16	0.0	0.0	0.0	0.0	0.0
Insurance & intermediaries payables		0.0	0.0	0.0	0.0	0.0
Reinsurance payables	18	0.0	0.0	0.0	0.0	0.0
Payables (trade, not insurance)	12	(0.02)	0.0	0.0	(0.02)	0.0
Subordinated liabilities	15	0.0	0.0	0.0	0.0	0.0
Subordinated liabilities not in BOF		0.0	0.0	0.0	0.0	0.0
Subordinated liabilities in BOF		0.0	0.0	0.0	0.0	0.0
<b>Total Liabilities</b>		<b>(0.02)</b>	<b>0.0</b>	<b>0.0</b>	<b>(0.02)</b>	<b>0.0</b>
<b>Excess of Assets over Liabilities</b>		<b>3.68</b>	<b>0.0</b>	<b>0.0</b>	<b>(0.02)</b>	<b>0.0</b>

## D.1 ASSETS

### INVESTMENTS (OTHER THAN ASSETS HELD FOR INDEX-LINKED AND UNIT-LINKED CONTRACTS)

#### EUROPEAN GROUP

The European Group's investments are segregated into the following categories:

- D. Participations
- E. Equities
- F. Bonds (including Government Bonds, Corporate Bonds, Structured Products and Collateralised Securities)
- G. Collective Investment Undertakings (Investment Funds)
- H. Deposits other than cash equivalents

All assets are measured at fair value in accordance with the Solvency II Directive.

The European Group's participations represent non-controlling interest in subsidiaries. Under Solvency II, these participations are accounted for using the adjusted equity method by applying Article 75 valuation principles on their individual assets and liabilities.

The table below shows the split of the European Group's total investments between AEL and other component entities.

The consolidation adjustment of £3,522.4m serves to eliminate the net assets of AHEL's and AEL's subsidiaries which are fully consolidated on a line-by-line basis.

£m	Bonds	Deposits other than cash equivalents	Property (Other than for own use)	Investment Funds	Equities	Participations	Total
AHEL Solo	0.0	0.0	0.0	0.0	0.0	3,459.30	3,459.30
AEL	9,718.23	0.0	0.0	3.73	4.81	202.53	9,929.30
Other Subsidiaries	515.53	0.25	0.0	75.23	0.0	0.25	591.26
Consolidation Adjustments	0.0	0.0	0.0	0.0	0.0	(3,522.44)	(3,522.44)
<b>AHEL Consolidated</b>	<b>10,233.76</b>	<b>0.24</b>	<b>0.0</b>	<b>78.96</b>	<b>4.81</b>	<b>139.64</b>	<b>10,457.41</b>

#### AIG EUROPE LIMITED

Under Solvency II, investments excluding participations are measured using fair valuation principles in line with IFRS 13.

Investments are classified into the three tiers of fair value hierarchy based on the characteristics of inputs available in the marketplace. The following valuation hierarchy is used:

- **Level 1:** Quoted market prices in active markets for the same assets.
- **Level 2:** Quoted market prices in active markets for similar assets with adjustments to reflect differences. The adjustments reflect factors specific to the asset including the condition or location of the asset, the extent to which inputs relate to items that are comparable with the asset and the volume or level of activity in the markets within which the inputs are observed.
- **Level 3:** Alternative valuation methods which make use of relevant market inputs including:
  - Quoted prices for identical or similar assets in markets which are not active;

- Inputs other than quoted prices that are observable for the asset, including interest rates and yield curves observable at commonly quoted intervals, implied volatilities and credit spreads; and
- Market-corroborated inputs, which may not be directly observable but are based on or supported by observable market data.

Holdings in related undertakings, including participations are held at cost less impairment under IFRS. Under Solvency II, participations are valued using the adjusted equity method by applying the Article 75 valuation principles on the individual assets and liabilities of the Company's subsidiaries.

At 30<sup>th</sup> November 2018, £84.1m accrued interest was reclassified from other receivables under IFRS to the relevant asset categories under Solvency II.

The table below shows the split of AEL's total investments between the different Solvency II asset categories, as well as the reclassification and valuation adjustments applied at 30<sup>th</sup> November 2018.

Note 1: Total Investments, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Property (other than for own use)	0.0	0.0	0.0	0.0	0.0
Participations	47.17	0.0	155.36	202.53	139.64
Equities	0.0	0.0	4.81	4.81	4.81
Bonds	9,787.55	81.0	(150.3)	9,718.23	10,233.76
Investment funds	0.0	0.0	3.73	3.73	78.96
Deposits other than cash equivalents	0.0	0.0	0.0	0.0	0.24
<b>Balance as at 30 November 2018</b>	<b>9,834.72</b>	<b>81.0</b>	<b>13.6</b>	<b>9,929.30</b>	<b>10,457.41</b>

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

Under Solvency II, investments excluding participations are measured using fair valuation principles.

Investments are classified into the three tiers of fair value hierarchy based on the characteristics of inputs available in the marketplace. The following valuation hierarchy is used:

- **Level 1:** Quoted market prices in active markets for the same assets.
- **Level 2:** Quoted market prices in active markets for similar assets with adjustments to reflect differences. The adjustments reflect factors specific to the asset including the condition or location of the asset, the extent to which inputs relate to items that are comparable with the asset and the volume or level of activity in the markets within which the inputs are observed.
- **Level 3:** Alternative valuation methods which make use of relevant market inputs including:

- Quoted prices for identical or similar assets in markets which are not active;
- Inputs other than quoted prices that are observable for the asset, including interest rates and yield curves observable at commonly quoted intervals, implied volatilities and credit spreads; and
- Market-corroborated inputs, which may not be directly observable but are based on or supported by observable market data.

Under Solvency II, participations are valued using the adjusted equity method by applying the Article 75 valuation principles on the individual assets and liabilities of the Company's subsidiaries.

At 30<sup>th</sup> November 2018 AIG UK's investments were in cash and cash equivalents as it can be seen in the EBS.

Note 1: Total Investments, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Property (other than for own use)	0.0	0.0	0.0	0.0	0.0
Participations	0.0	0.0	0.0	0.0	139.64
Equities	0.0	0.0	0.0	0.0	4.81
Bonds	0.0	0.0	0.0	0.0	10,233.76
Investment funds	0.0	0.0	0.0	0.0	78.96
Deposits other than cash equivalents	0.0	0.0	0.0	0.0	0.24
<b>Balance as at 30 November 2018</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>10,457.41</b>

**LOANS AND MORTGAGES****ALTERNATIVE VALUATION METHOD**

Loans and mortgages are measured at amortised cost under IFRS and UK GAAP. Under Solvency II, they are measured at fair value using the Income Approach through the discounted cash flow method.

The discounted cash flow method relies on the use of unobservable market inputs to reflect the assumptions market participants would use in pricing the asset or liability based on sources independent of the entity pricing the asset or liability. Unobservable inputs reflect internal assumptions in regards to the assumptions market participants use in pricing the asset or liability (including assumptions about risks inherent in the asset or liability or inherent in the model used to estimate the price of the asset or liability).

The own data used to develop unobservable inputs is adjusted if information indicating that market participants would use different assumptions is reasonably available without undue cost and effort.

**AIG EUROPE LIMITED**

AEL's loans and mortgages are measured at amortised cost under IFRS. Under Solvency II, they are measured at fair value using the discounted cash flow method as described above.

The unobservable valuation inputs are updated only when corroborated by evidence such as market transactions.

The table below shows the split of the European Group's loans and mortgages between AEL and other component entities.

Loans and Mortgages	£'m
AHEL Solo	15.0
AEL	393.44
Other Subsidiaries	0.82
Consolidation Adjustment	(15.4)
<b>AHEL Consolidated</b>	<b>393.86</b>

The consolidation adjustment of £(15.4)m represents the elimination of intragroup loans.

The table below shows the reclassification and valuation adjustments made to loans and mortgages at 30<sup>th</sup> November 2018.

Note 2: Loans and Mortgages, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	391.66	3.2	(1.7)	393.44	393.86

At 30<sup>th</sup> November 2018, had no accrued interest was reclassified from other receivables.

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

Under Solvency II, loans and mortgages are measured at fair value using the discounted cash flow method as described above. The table below shows the reclassification and valuation adjustments made to loans and mortgages at 30<sup>th</sup> November 2018.

Note 2: Loans and Mortgages, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	393.86

**RECEIVABLES (TRADE, NOT INSURANCE)****EUROPEAN GROUP**

Receivables (trade, not insurance) relate to prepayments and other receivables which are due within 1 year. Owing to their short term nature, the amortised cost valuation under IFRS is taken to approximate fair valuation.

The table below shows the split of the European Group's trade receivables between AEL and other component entities.

Receivables (Trade, Not Insurance)	£'m
AHEL Solo	11.7
AEL	415.8
Other Subsidiaries	210.5
Consolidation Adjustment	(159.93)
<b>AHEL Consolidated</b>	<b>478.07</b>

The consolidation adjustment of £(159.93)m represents the elimination of intragroup trade balances.

**AIG EUROPE LIMITED**

The table below shows the reclassification and valuation adjustments made to trade receivables at 30<sup>th</sup> November 2018.

At 30<sup>th</sup> November 2018, £84.15m of accrued interest was reclassified from trade receivables to the relevant asset categories within Total Investments.

Note 3: Receivables (trade, not insurance), £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	499.94	(84.15)	0.0	415.8	478.07

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

The table below shows the reclassification and valuation adjustments made to trade receivables at 30<sup>th</sup> November 2018.

At 30<sup>th</sup> November 2018, no accrued interest was reclassified from trade receivables to the relevant asset categories within Total Investments.

Note 3: Receivables (trade, not insurance), £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.04	0.0	0.0	0.04	478.07

**REINSURANCE RECEIVABLES****EUROPEAN GROUP**

(Re)insurance receivables comprise amounts past due by (re)insurers and linked to (re)insurance business, including:

- Receivables from (re)insurers that relate to settled claims of policyholders or beneficiaries.
- Receivables from (re)insurers in relation to other than insurance events or settled insurance claims (e.g. commissions).

The European Group's (re)insurance receivables are all due within 12 months. Owing to their short term nature, the amortised cost valuation under IFRS is taken to approximate fair valuation. Under Solvency II, insurance receivables form part of the future premium cash flows which make up the "gross premium provisions" component of the Solvency II technical provisions.

The table below shows the split of the European Group's (re)insurance receivables between AEL and other component entities.

Insurance and Intermediaries Receivables	£'m
AEL	32.93
Other Subsidiaries	1.08
Consolidation Adjustment	0.0
<b>AHEL Consolidated</b>	<b>34.01</b>
<b>Reinsurance Receivables</b>	<b>£m</b>
AEL	296.19

Other Subsidiaries	2.12
<b>AHEL Consolidated</b>	<b>298.32</b>

**AIG EUROPE LIMITED**

The table below shows the reclassification and valuation adjustments made to (re)insurance receivables at 30<sup>th</sup> November 2018.

At 30<sup>th</sup> November 2018, there was no reclassification adjustment as insurance receivables which are “not past due” under IFRS are treated as future cash flows and reclassified to technical provisions under Solvency II.

Note 4: Insurance and Intermediaries Receivables, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	1,280.61	(1,247.7)	0.0	32.93	34.01

At 30<sup>th</sup> November 2018, there were no differences between IFRS and Solvency II for reinsurance receivables.

Note 4: Reinsurance Receivables, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	296.19	0.0	0.0	296.19	298.32

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

The table below shows the reclassification and valuation adjustments made to (re)insurance receivables at 30<sup>th</sup> November 2018.

At 30<sup>th</sup> November 2018, there were no differences between UK GAAP and Solvency II for insurance and intermediaries receivables.

Note 4: Insurance and Intermediaries Receivables, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	34.01

At 30<sup>th</sup> November 2018, there were no differences between UK GAAP and Solvency II for reinsurance receivables.

Note 4: Reinsurance Receivables, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	298.32

**CASH AND CASH EQUIVALENTS****EUROPEAN GROUP**

Cash and cash equivalents comprise cash in hand and demand deposits with banks together with short-term highly liquid investments that are readily convertible into known amounts of cash and that are not subject to a significant risk of change in value. Such investments are classified as cash equivalents where they have maturity dates of three months or less from the date of acquisition. Owing to their short term nature, their face value is taken to approximate fair value.

The table below shows the split of the European Group's cash and cash equivalents between AEL and other component entities.

Cash and Cash Equivalents	£'m
AHEL Solo	3.8
AEL	647.8
Other Subsidiaries	163.02
<b>AHEL Consolidated</b>	<b>814.62</b>

**AIG EUROPE LIMITED**

At 30<sup>th</sup> November 2018, there were no differences between IFRS and Solvency II for cash and cash equivalents.

Note 5: Cash and Cash Equivalents, £m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	647.8	0.0	0.0	647.8	814.62

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

At 30<sup>th</sup> November 2018, there were no differences between UK GAAP and Solvency II for cash and cash equivalents.

Note 5: Cash and Cash Equivalents, £m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	3.70	0.0	0.0	3.70	814.62

**PROPERTY, PLANT & EQUIPMENT HELD FOR OWN USE****EUROPEAN GROUP****Alternative valuation method**

The IAS 16 Revaluation model is applied to the measurement of property both under IFRS and Solvency II.

Under the IAS 16 Revaluation model, property is held at the revalued amount, being the fair value at the date of revaluation less any subsequent accumulated depreciation and subsequent accumulated impairment losses. The European Group's property portfolio is revalued on a regular basis at open market valuation by independent, professionally qualified valuers. These valuations are

in accordance with the requirements of the International Valuation Standards Committee, IAS 16 and IFRS 13 'Fair Value Measurement'.

Other items of property and equipment (e.g. leasehold improvements, fixtures and fittings) are stated at historical cost less subsequent accumulated depreciation and subsequent accumulated impairment losses. Owing to immateriality, they are not restated to fair value for Solvency II purposes.

The table below shows the split of the European Group's property, plant and equipment between AEL and other component entities.

Property, Plant and Equipment Held for Own Use	£'m
AEL	131.33
Other Subsidiaries	10.17
<b>AHEL Consolidated</b>	<b>141.5</b>

**AIG EUROPE LIMITED**

At 30<sup>th</sup> November 2018, there were no differences between IFRS and Solvency II for property, plant and equipment "held for own use" and "other than for own use".

Note 6: Property, Plant & Equipment, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	131.33	0.0	0.0	131.33	141.5

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

At 30<sup>th</sup> November 2018, there were no differences between UK GAAP and Solvency II for property, plant and equipment "held for own use" and "other than for own use".

Note 6: Property, Plant & Equipment, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	141.5

**DEFERRED TAX ASSET****EUROPEAN GROUP**

The Solvency II measurement principles for deferred taxes are consistent with IAS 12.

Deferred tax is provided in full on all temporary differences arising between the Solvency II valuation and the tax bases of assets and liabilities.

Deferred tax is calculated by jurisdiction such that applicable national tax rates are used for these calculations.

The deferred tax assets and liabilities are netted off if the counterparty is the same tax authority and there is an ability to settle net. Deferred tax assets are further tested for recoverability from brought-forward losses or expected future taxable profits at the level of each subsidiary.

The table below shows the split of the European Group's deferred tax assets between AEL and other component entities.

Deferred Tax Assets	£'m
AEL	116.55
Other Subsidiaries	25.75
<b>AHEL Consolidated</b>	<b>142.3</b>

#### AIG EUROPE LIMITED

The table below shows the reclassification and valuation adjustments made to deferred tax assets at 30<sup>th</sup> November 2018.

Note 7: Deferred Tax Asset, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	85.07	(9.6)	41.08	116.55	142.3

At 30<sup>th</sup> November 2018, there was no reclassification adjustment was made to net down the deferred tax position within each country.

In addition there was no valuation adjustment in respect of the temporary valuation differences between IFRS and Solvency II.

#### AMERICAN INTERNATIONAL GROUP UK LIMITED

The table below shows the reclassification and valuation adjustments made to deferred tax assets at 30<sup>th</sup> November 2018.

Note 7: Deferred Tax Asset, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	142.3

## DEFERRED ACQUISITION COST

#### EUROPEAN GROUP

Under IFRS, acquisition costs, which represent commissions and other related costs, are deferred and amortised over the period in which the related premiums are earned.

Under Solvency II, deferred acquisitions are written off. All cash flows arising from expenses that will be incurred in servicing all recognised insurance and reinsurance obligations over the lifetime are instead considered in determining the best estimate technical provisions (see Section D.2).

#### AIG EUROPE LIMITED

The table below shows the reclassification and valuation adjustments made to deferred acquisition costs at 30<sup>th</sup> November 2018.

Note 8: Deferred Acquisition Costs, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	313.5	0.0	(313.5)	0	0.0

At 30 November 2018, £313.5m of deferred acquisition costs were written off under Solvency II.

#### AMERICAN INTERNATIONAL GROUP UK LIMITED

The table below shows the reclassification and valuation adjustments made to deferred acquisition costs at 30<sup>th</sup> November 2018.

Note 8: Deferred Acquisition Costs, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	0.0

**INTANGIBLE ASSETS****EUROPEAN GROUP**

The European Group's intangible assets include capitalised software costs and acquired brands. Under IFRS, intangible assets are measured at historical cost less accumulated amortisation and impairment.

Under Solvency II, intangible assets are valued at zero unless they can be sold separately and their values can be derived using quoted prices in active markets. At 30<sup>th</sup> November 2018, none of the European Group's intangible assets met this criterion therefore the whole amount was written off.

**AIG EUROPE LIMITED**

The table below shows the reclassification and valuation adjustments made to intangible assets at 30<sup>th</sup> November 2018.

Note 9: Intangible Assets, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	12.86	0.0	(12.86)	0.0	0.0

At 30<sup>th</sup> November 2018, £12.86m of intangible assets were written off under Solvency II.

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

The table below shows the reclassification and valuation adjustments made to intangible assets costs at 30 November 2018.

Note 9: Intangible Assets, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	0.0

**PENSION BENEFIT SURPLUS****EUROPEAN GROUP**

The European Group's subsidiaries operate a number of pension schemes, whose members receive benefits on either a defined benefit or defined contribution basis. Under IFRS, the defined benefit obligation and associated surplus or deficit are calculated by independent actuaries using the projected unit credit method in accordance with IAS 19.

The Solvency II measurement of pension assets and liabilities is consistent with IAS 19 measurement.

At 30<sup>th</sup> November 2018, the pension benefit surplus reported by the European Group related to AEL.

Pension Benefit Surplus	£'m
AEL	33.9
<b>AHEL Consolidated</b>	<b>33.9</b>

**AIG EUROPE LIMITED**

At 30<sup>th</sup> November 2018, there were no differences between IFRS and Solvency II for pension benefit surplus.

Note 10: Pension Benefit Surplus, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	33.9	0.0	0.0	33.9	33.9

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

At 30<sup>th</sup> November 2018, there were no differences between UK GAAP and Solvency II for pension benefit surplus.

Note 10: Pension Benefit Surplus, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	33.9

## D.2 TECHNICAL PROVISIONS

The technical provisions are defined as the probability-weighted average of future cash flows, discounted to take into account the time value of money considering all possible future scenarios. The cash flow projection used in the calculation of the best estimate takes account of all the cash in-flows and out-flows required to settle the insurance and reinsurance obligations over their lifetime.

Technical provisions are grouped into the following key components:

### AIG EUROPE LIMITED & AMERICAN INTERNATIONAL GROUP UK LIMITED

Solvency II requires Technical Provisions to be segmented by Solvency II lines of business. The Company's segmentation of lines of business is more granular and is dependent on IFRS and UK GAAP reserving process that groups the risks using major/minor risk codes and reserving classes. The grouping of risks considers both the homogeneity of the risk profiles and the sufficiency of credible data in the analysis of development pattern and the underlying volatility. As with standard actuarial techniques, large individual claims are considered separately from the remainder of the risk group if the inclusion would otherwise distort results, or if separation would be considered to produce a more reliable valuation.

Reserving classes are further split by country and then allocated by currency based on currency mix factors. These factors are

### VALUATION BASIS, METHODS AND MAIN ASSUMPTIONS

Currently the European regulations do not apply to AIG Israel and therefore it is not required to produce an annual SFCR. However, the Israeli regulator has been moving steadily towards implementing a prudential regime similar to Solvency II. The technical provisions valuation methodology for AIG Israel is in line with Solvency II regulations.

At the European Group level, the consolidated Best Estimate of technical provisions is calculated as the sum of Solvency II Best Estimates of AEL, AIG Life and AIG Israel. Where there are intra-group reinsurance contracts, the following adjustments will be made:

### AIG EUROPE LIMITED & AMERICAN INTERNATIONAL GROUP UK LIMITED

The technical provisions are defined as the probability-weighted average of future cash flows, discounted to take into account the time value of money considering all possible future scenarios. The cash flow projection used in the calculation of the best estimate takes account of all the cash in-flows and out-flows required to settle the insurance and reinsurance obligations over their lifetime.

## Notes to Economic Balance Sheet

### EUROPEAN GROUP

In comparison to 2017, there has been no material changes in the assumptions used to calculate the Solvency II technical provisions. The European Group's Technical Provisions are categorised as:

- **Non-life Excluding Health** is the largest category of technical provisions (c. 94% of gross technical provisions) and it relates to the following SII LoBs:
  - D. General Liability (AEL, AIG UK and AIG Israel)
  - E. Motor Vehicle Liability (AEL, AIG UK and AIG Israel)
  - F. Fire and Other Damage to Property (AEL, AIG UK and AIG Israel)
  - G. Other Motor Insurance (AEL, AIG UK and AIG Israel)
  - H. Marine, Aviation and Transport (AEL, AIG UK)

- Gross claims provisions: Best Estimate of provisions that relate to the earned exposure.
- Gross premium provisions: Best Estimate of provisions that relate to the unearned exposure i.e. driven by unearned premium and policies which are bound but not yet incepted (BBNI) at the valuation date.
- Risk margin: Additional provision to bring the Best Estimates to the level required to transfer the obligations to a third party undertaking.

calculated based on outstanding loss reserves and earned premium data as at the valuation date.

The currency level reserves are converted into cash flows using payment patterns and are discounted by applying risk-free yield curves (by currency) that are provided by EIOPA to get Technical Provisions by reserving classes.

Technical Provisions by reserving classes are then mapped to the Solvency II lines of business. In cases where more than one reserving class maps to a single Solvency II line of business, the reserving classes are assumed to be independent of each other. In cases where one reserving class maps to more than one Solvency II lines of business, an assessment is carried out to derive allocation assumptions based on the outstanding claims or claims reserve as at valuation date. This includes where reserving classes should be split into direct business, proportional reinsurance business and non-proportional reinsurance business.

- The best estimate of the undertaking that accepts risks shall not include the cash flows arising from the obligations of the intra-group reinsurance contracts; and
- The undertaking that cedes the risk will not recognize the amounts recoverable from the intra-group reinsurance contracts.

There were no material intra-group reinsurance contracts at 30<sup>th</sup> November 2018.

The European Group's Risk Margin is the sum of solo Risk Margins for AEL (AIG UK from 1<sup>st</sup> December 2018), AIG Life and AIG Israel.

Technical provisions are grouped into the following key components:

- Gross claims provisions: Best Estimate of provisions that relate to the earned exposure.
- Gross premium provisions: Best Estimate of provisions that relate to the unearned exposure i.e. driven from unearned premium and policies which are bound but not yet incepted (BBNI) at the valuation date.
- Risk margin: Additional provision to bring the Best Estimates to the level required to transfer the obligations to a third party undertaking.

- I. Credit and Suretyship (AEL, AIG UK)
- J. Miscellaneous Financial Loss (AEL, AIG UK)
- **Health Similar to Non-life Techniques (Health NSLT)** is the second largest category of technical provisions of the European Group and it relates to the following SII LoBs:
  - Medical Expense (AEL and AIG Israel)
  - Income Protection (AEL and AIG Israel)
  - Workers' Compensation (AEL)
- **Life excluding health, unit-linked and index-linked** relates to following SII LoBs:
  - Other Life Insurance that represents life protection products (AIG Israel and AIG Life)
  - Annuities stemming from non-life insurance contracts and relating to health insurance obligations namely Periodic Payment Orders or PPOs that arise from General Liability and Motor Vehicle Liability lines of AEL.
- **Health Similar to Life Techniques (Health SLT)** relates to critical illness and income protection products of AIG Life and AIG Israel.

The sum of technical provisions of Non-life Excluding Health and Health NSLT represents the total non-life technical provisions. Similarly, the sum of Life excluding health, unit-linked and index-linked and Health SLT represents the Total Life Technical Provisions.

£'m	Non-life excluding health	Health Similar to Non-life Techniques (Health NSLT)	Non-life Total	Life excluding health, index- linked and unit- linked	Health Similar to Life Techniques (HSLT)	Life Total
Best Estimate	(10,580.3)	(292.9)	(10,873.2)	(425.2)	45.4	(379.8)
Risk Margin	(548.18)	(25.9)	(552.9)	(59.3)	(38.5)	(97.8)
<b>Gross Technical Provision</b>	<b>(11,128.5)</b>	<b>(318.8)</b>	<b>(11,447.3)</b>	<b>(484.5)</b>	<b>6.9</b>	<b>(477.6)</b>
Reinsurance Recoverable	2,824.45	2.28	2,826.73	538.06	85.71	623.77
<b>Net Technical Provision</b>	<b>(8,304.03)</b>	<b>(316.52)</b>	<b>(8,620.55)</b>	<b>53.56</b>	<b>92.61</b>	<b>146.17</b>

Source AHSL QRT S.02.01

#### AIG EUROPE LIMITED & AMERICAN INTERNATIONAL GROUP UK LIMITED

##### GROSS CLAIMS PROVISIONS

IFRS and UK GAAP best estimate of reserves (with no margin for prudence) are used as the starting point to estimate the gross claims provisions before the following adjustments are applied:

- Expenses.
- Events Not in Data (ENID).
- Discounting credit.
- Reinsurance recoveries (less bad debt).
- Any segmentation required to complete the calculations.

The IFRS reserves are calculated using a deterministic process, analysing gross and net claims separately, using a combination of Chain Ladder and Bornhuetter-Ferguson methods. Expert judgements are applied on the selection of the method used to estimate the ultimate, development factors, tail factors and prior loss ratios for each origin period. Over 20 years of data is considered for the analysis.

##### GROSS PREMIUM PROVISIONS

The Unearned Premium Reserve (UEPR) is used as the starting point to estimate gross best estimate premium provisions before the following adjustments are applied:

- Application of budget loss ratios to reduce the unearned premium reserve for claims liability.
- BBNI business.
- Expenses.
- ENID.
- Discounting credit.
- Future premium (payables and receivables).
- Reinsurance recoveries (less bad debt).
- Any segmentation required to complete the calculations.

The UEPR amount includes the unearned Late Travelling Premium (LTP) balance as at the valuation date. LTP are premiums that are incepted but not yet fully booked into the system by year-end for various reasons, such as delays in receiving information from the broker.

#### SOLVENCY II ADJUSTMENTS

The details of Solvency II adjustments that are applied to AEL's (and AIG UK's post 1<sup>st</sup> December 2018) IFRS and UK GAAP reserves to get Best Estimates of Technical Provisions are as follows:

##### 1. CLAIMS CASH FLOWS OF UNEARNED BUSINESS

Budget loss ratios are used to calculate the expected losses from unearned business in the premium provisions. They are derived utilising the actuarial best estimate ultimate loss ratio assumptions with adjustments made to allow for future expected inflation and rate changes.

##### 2. BBNI (BOUND BUT NOT INCEPTED)

BBNI premium income relates to policies which the Company is legally obliged to write but which have not yet been incepted as at the valuation date. This business usually arises due to tacit arrangements (i.e. where policies are automatically renewed unless either the policyholder or insurer provides a cancellation notice before the auto renewal date). BBNI premium and commission are allowed for in the calculation and profit from BBNI acts to reduce the best estimate Technical Provisions.

The BBNI methodology differs depending on the country to accurately reflect individual country bookings, data availability and seasonality characteristics. BBNI is adjusted by lapse rates.

### 3. EXPENSES

Solvency II requires the best estimates to take into account expenses which relate to recognised insurance and reinsurance obligations of insurance and reinsurance undertakings. These expenses have been classified into the following five subgroups and the table below illustrates which expenses are included in the claims provision and which are included in the premium provision.

Since IFRS reserves include Allocated Loss Adjustment Expenses ("ALAE") no further allowance for ALAE is made in the best estimate technical provisions. All expenses are applied on a gross basis and it is assumed there are no ceded expenses.

Assumptions on the percentage loadings of Solvency II expenses are based on Gross Operating Expenses. Key assumptions are applied around the proportion of administration expenses to include in the Solvency II expense loading.

Expense type	Premium provision	Claims provision
Administrative expenses	✓	
Investment management expenses	✓	✓
Claims management expenses	✓	✓
Reinsurance management expenses	✓	✓
Acquisition expenses	✓	

### 4. EVENTS NOT IN DATA (ENID)

ENID adjustment is designed to capture those potential future claims that do not exist in the historical data used for IFRS reserves calculation. These claims are typically caused by low-frequency, high-severity man-made hazards. Historical events which are contained within the Company's historical loss experience are also considered to ascertain whether further scenarios or loadings need to be applied.

### 5. DISCOUNTING CREDIT

Claims and premium provisions are converted to future cash flows by application of payment patterns to determine how much of the provisions will be paid out in each of the future calendar years.

Ceded claims cash flows are assumed to have the same payment pattern as the gross cash flows. For each country within Continental Europe, the same payment patterns are used by line of business, which mirrors the IFRS best estimate reserving process.

The risk-free yield curves (with no volatility adjustment and matching adjustment) provided by EIOPA for each currency are used to discount future cash flows of premium and claim provisions to the valuation date, to take account of the time-value of money. The cash flows are discounted mid-year, which assumes that the average claim is paid mid-year.

### 6. FUTURE PREMIUM (PAYABLES AND RECEIVABLES)

The Solvency II regime allows liability cash flows to be offset by premium receivables cash flows that are expected to be received but are not overdue, in the technical provisions calculation. Similarly, premiums payables which have not yet been paid by the Company also need to be taken into account.

Due to nature of the business, premium receivables and payables relate to first year of projected cash flows and therefore, are not discounted. Premium receivables are much higher than premium payables and therefore, result in reduction of premiums provision.

Premiums provision calculation on a net basis takes into account reinsurance payables (i.e. money owed by the Company in respect of reinsurance contracts).

### 7. REINSURANCE RECOVERIES (LESS BAD DEBT)

The reinsurance recoveries are calculated separately for the claims provision and the premiums provision, with the ceded IFRS reserves and ceded UEPR respectively used as the start point in the calculation.

To determine the IFRS ceded reserves, a netting-down approach is used, where the estimates of claims gross and net of reinsurance are modelled and the reinsurance recoveries taken as the difference. The reinsurance structure for the existing business is considered in the projection of the best estimate by the reserving team.

#### *Principle of correspondence*

The Company currently adopts the principle of correspondence in its treatment of all reinsurance, for both current and future reinsurance contracts. Within the Company, if the premium for a reinsurance contract is paid out (e.g. in the form of deposit premium) in advance of the underlying business being bound, this premium is treated as a separate balance to the technical provisions in the EBS. Therefore there is no allowance in the technical provisions for recoveries or premiums from outwards reinsurance premiums relating to unbound inwards business.

The reinsurance bad debt provision is an adjustment to take into account the potential losses due to the default of reinsurance counterparties.

The adjustment increases net technical provisions in both the claims and premium provisions. The ceded IFRS reserves and the credit rating for each reinsurer as at the valuation date are used to allocate the ceded recoveries due on claims and premiums provisions to each reinsurer. The other inputs required by the simplification method are the modified duration, probability of default and loss-given default for each reinsurer.

In accordance with the principle of correspondence described above, reinsurance premiums and recoveries in respect of future reinsurance premiums are allowed for in the technical provisions where the purchase is consistent with the ongoing business strategy, as laid out in the budget.

## RISK MARGIN

Methodology 1, prescribed by EIOPA's Guideline 62, is used to calculate the future Solvency Capital Requirement ('SCR') relating to current obligations. The calculation is done in the Internal Model using loss distributions of Non-Catastrophic Insurance Risk (excluding New Business risk), Counterparty Default Risk, Operational Risk and Catastrophic Risk. The losses by risk type and by Solvency II line of business are run off individually, taking into account the duration of each line of business.

The future loss distributions are then aggregated and the future SCRs are calculated as the 99.5<sup>th</sup> percentile of the total loss distribution for each future time. These future SCRs are discounted with the appropriate GBP yield curve as prescribed by EIOPA. The sum of the discounted SCRs is multiplied by the Cost of Capital of 6% as prescribed by EIOPA to obtain an initial Risk Margin. The initial Risk Margin is then adjusted to account for any differences between the actual Technical Provisions on the Economic Balance Sheet and the modelled Technical Provisions in the Internal Model to obtain the final Risk Margin for the Company.

Lapses and other policyholder behaviours are assumed to be immaterial given the nature of the Company's business. Multi-year policies are assumed to be immaterial given the general business is to write one-year policies.

An allocation of the Risk Margin by Solvency II line of business is also produced using a simplified risk margin by line of business as allocation key.

## LEVEL OF UNCERTAINTY

### UNCERTAINTY IN BEST ESTIMATE RESERVING

Future claims experience is dependent on the external environment, which is subject to uncertainty, including that related to legislative, social and economic change. The impact of uncertain external factors is considered throughout the reserving exercise and discussed as part of the quarterly Reserve Committee meetings. Some of the key uncertainties include:

**Financial Lines:** This is a key area of uncertainty given the current macro environment and increased market and regulatory scrutiny of the banks. Examples of specific uncertainty include LIBOR fixing, credit crisis claims and Payment Protection Insurance ("PPI") mis-selling.

**Casualty:** Litigation changes such as the Ogden discount rate changes, Ministry of Justice reforms, Legal Aid, Sentencing and Punishment of Offenders Act (LASPO), abuse claims and industrial disease claims are areas of uncertainty.

**Cat Excess:** This consists of high-layer excess financial and casualty business, which typically has long reporting and settlement delays. As a result, there is a significant degree of relative uncertainty around the estimation of reserves for this book of business.

Uncertainty in the best estimate reserves can also arise from model error. Model error occurs when the methodology used does not accurately reflect the development process for the line of business (i.e. misspecification of the model). The reserving process considers model error in the three ways detailed below.

Modelling is completed using a variety of different methods including:

- Chain-ladder.
- Bornhuetter Fergusson.
- Frequency/Severity.
- Cape Cod.

Modelling is completed on both paid claims and incurred claims. For some lines of business, different large loss modelling approaches are tested.

The results of the modelling under each method type are compared and documented as part of the modelling process and calculation of final claim reserves to allow for mitigation of model error.

### UNCERTAINTY IN CASH FLOWS

The payment of future claims is dependent on the payment pattern used to discount the cash flows. Two main assumptions are made in application of the pattern:

- The development of the reinsurance paid claims is equal to the development of gross paid claims. This assumption has been validated by comparing the gross and net payment patterns.
- The payment patterns derived from the estimation of the IFRS reserves are appropriate to use for both the claims provision and the premium provision.

### UNCERTAINTY IN THE EXPENSES ESTIMATE

The expense allocation is based on incurred historical expenses and expert judgement is applied to convert these expenses to a Solvency II valuation basis. The main judgments relate to the inclusion of head office costs and the portion of direct expenses to include in the administration loading.

### UNCERTAINTY IN THE BBNI ESTIMATE

The premium estimate is sensitive to the number of weeks that are assumed as bound prior to inception in countries where more granular policy level data for the calculation is not available. This assumption has been subject to sensitivity-testing, and is particularly relevant for quarters where major renewal dates might be captured (for example, 1st of January). Although the actual BBNI premium estimate is sensitive to the number of weeks assumed, the impact on Solvency II Technical Provisions are dampened as only the profit portion of the BBNI premium is considered.

### VALUE OF TECHNICAL PROVISIONS FOR EACH MATERIAL LINE OF BUSINESS

General Liability, Marine, Aviation and Transport and Fire and Other Damage business represent over 90% of the Company's net technical provisions. The main methods and assumptions applied in the calculation of the technical provisions for these segments are described in Section D.2 above.

All assumptions are applied in a consistent manner for each line of business although the underlying values may differ by line (e.g. there is a higher discount benefit in General Liability compared to Fire and Other Damage as claims in General Liability take longer to settle).

The composition of the European Group's Technical Provisions by material SII LoBs is consistent with that of AEL and it is unchanged since last year. General Liability, Fire & other Damage to Property, Motor Vehicle Liability and Marine, aviation and transport represent the most material SII LoBs by Technical Provisions for the European Group.

#### AIG EUROPE LIMITED

£'m	General Liability	Fire & Other Damage to Property	Motor Vehicle Liability	Marine, Aviation and Transport
Best Estimate	(6,077.04)	(2,010.29)	(918.33)	(765.89)
Risk Margin	(347.37)	(79.26)	(32.17)	(38.32)
<b>Gross Technical Provision</b>	<b>(6,424.41)</b>	<b>(2,089.55)</b>	<b>(950.5)</b>	<b>(804.20)</b>
Reinsurance Recoverable	1,061.98	858.48	462.23	215.11
<b>Net Technical Provision</b>	<b>(5,362.42)</b>	<b>(1,231.07)</b>	<b>(488.27)</b>	<b>(589.10)</b>

Source AEL QRT S.17.01.02

#### GENERAL LIABILITY INSURANCE

General Liability lines made up 58% of SII technical provisions. IFRS reserves for Liability and Financial lines that represent Casualty (General Liability), D&O and Professional Indemnity business are the starting point for the calculation of technical provisions of this Solvency II line. Solvency II adjustments are applied to IFRS reserves to get Solvency II Technical Provisions and the most material adjustments that result in reduction of IFRS reserves are for the UEPR profit which amounts to £230.5m and future premium (receivables and payables) of £243.1m.

#### FIRE AND OTHER DAMAGE TO PROPERTY INSURANCE

Fire and Other Damage lines represents 19% of SII technical provisions. IFRS reserves that represent Property and Energy business are the starting point for the calculation of technical provisions for this Solvency II line. Solvency II adjustments are applied to IFRS reserves to get Solvency II Technical Provisions and the most material adjustments that result in reduction of IFRS reserves are for the UEPR profit which amounts to £152.3m and future premium (receivables and payables) of £ 78.5m.

#### MARINE, AVIATION AND TRANSPORT INSURANCE

Marine, Aviation and Transport represents 7% of SII technical provisions. IFRS reserves that represent Marine and Aerospace business are the starting point for the calculation of technical provisions for this Solvency II line. Solvency II adjustments are applied to IFRS reserves to get Solvency II Technical Provisions and the most material adjustments that result in reduction of IFRS reserves are for the UEPR profit which amounts to £30.8m and future premium (receivables and payables) of £36.5m.

#### MOTOR VEHICLE LIABILITY INSURANCE

Motor Vehicle Liability insurance represents 9% of Solvency II technical provisions. IFRS reserves that represent Casualty (Auto) and Personal Auto Liability business are the starting point for the calculation of TPs for this Solvency II line. Solvency II adjustments are applied to IFRS reserves to get Solvency II Technical Provisions and the most material adjustments that result in reduction of IFRS reserves are for the UEPR profit which amounts to £17.5m and future premium (receivables and payables) of £53.4m.

#### AMERICAN INTERNATIONAL GROUP UK LIMITED

£'m	General Liability	Fire & Other Damage to Property	Motor Vehicle Liability	Marine, Aviation and Transport
Best Estimate	0.0	0.0	0.0	0.0
Risk Margin	0.0	0.0	0.0	0.0
<b>Gross Technical Provision</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
Reinsurance Recoverable	0.0	0.0	0.0	0.0
<b>Net Technical Provision</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

#### PERIODIC PAYMENT ORDERS

Life technical provisions arise from non-life claims of Motor Vehicle Liability and General Liability lines that are paid as annuities. These annuities are called Periodic Payment Orders (PPOs).

#### AIG EUROPE LIMITED

Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Best Estimate 2018 £'m	Risk Margin 2018 £'m	SII Value 2018 £'m
<b>Total</b>	<b>(64.39)</b>	<b>(3.64)</b>	<b>(68.03)</b>

\*BE – Best Estimate

\*\*RM - Risk Margin

## AMERICAN INTERNATIONAL GROUP UK LIMITED

Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations

	Best Estimate 2018 £'m	Risk Margin 2018 £'m	SII Value 2018 £'m
<b>Total</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

## D.3 OTHER LIABILITIES

## PAYABLES (TRADE, NOT INSURANCE)

## EUROPEAN GROUP

Payables (trade, not insurance) include accruals and creditor balances which do not arise from insurance operations. Owing to their short term nature, the amortised cost valuation under IFRS is taken to approximate fair valuation.

The table below shows the split of the European Group's trade payables between AEL and other component entities.

Payables (Trade, Not Insurance)	£'m
AHEL Solo	(3.62)
AEL	(337.4)
Other Subsidiaries	(276.3)
Consolidation Adjustment	158.62
<b>AHEL Consolidated</b>	<b>(458.7)</b>

The consolidation adjustment of £158.62m represents the elimination of intragroup trade balances.

## AIG EUROPE LIMITED

The table below shows the reclassification and valuation adjustments made to trade payables at 30<sup>th</sup> November 2018.

At 30<sup>th</sup> November 2018, £91.27m of reclassification adjustments related to insurance taxes were reclassified into the Solvency II Technical Provisions.

Note 12: Payables (Trade, Not Insurance), £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	(428.67)	91.27	0.0	(337.4)	(458.7)

## AMERICAN INTERNATIONAL GROUP UK LIMITED

The table below shows the reclassification and valuation adjustments made to trade payables at 30<sup>th</sup> November 2018.

Note 12: Payables (Trade, Not Insurance), £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	(0.02)	0.0	0.0	(0.02)	(458.7)

## NOTE 12: PROVISIONS OTHER THAN TECHNICAL PROVISIONS

## EUROPEAN GROUP

Provisions are recognised when there exists a present obligation (legal or constructive) as a result of a past event, where it is probable that an outflow of resource embodying economic benefits will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation. Under IFRS, a provision is measured in accordance with IAS 37, which is at the best estimate of the amount the entity would pay to settle the obligation or transfer it to a third party.

The recognition and measurement of provisions under Solvency II are consistent with IFRS.

At 30<sup>th</sup> November 2018, the amount reported by the European Group for other provisions related to AEL.

## Provisions Other Than Technical Provisions

AEL	(75.85)
<b>AHEL Consolidated</b>	<b>(75.85)</b>

## AIG EUROPE LIMITED

The table below shows the reclassification and valuation adjustments made to other provisions at 30<sup>th</sup> November 2018.

Note 13: Provisions Other Than Technical Provisions, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	(75.85)	0.0	0.0	(75.85)	(75.85)

## AMERICAN INTERNATIONAL GROUP UK LIMITED

The table below shows the reclassification and valuation adjustments made to other provisions at 30<sup>th</sup> November 2018.

Note 13: Provisions Other Than Technical Provisions, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	(75.85)

## PENSION BENEFIT OBLIGATIONS

## EUROPEAN GROUP

Refer to Note 10 for the IFRS and Solvency II valuation principles in respect of pension benefit obligations.

The table below shows the split of the European Group's pension benefit obligations between AEL and other component entities.

Pension Benefit Obligations	£'m
AEL	(60.55)
Other Subsidiaries	(55.09)
<b>AHEL Consolidated</b>	<b>(115.64)</b>

## AIG EUROPE LIMITED

At 30<sup>th</sup> November 2018, there were no differences between IFRS and Solvency II for pension benefit obligations.

Note 14: Pension Benefit Obligations, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	(60.55)	0.0	0.0	(60.55)	(115.64)

## AMERICAN INTERNATIONAL GROUP UK LIMITED

At 30<sup>th</sup> November 2018, there were no differences between IFRS and Solvency II for pension benefit obligations.

Note 14: Pension Benefit Obligations, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	(115.64)

## SUBORDINATED LIABILITIES

## EUROPEAN GROUP

Under IFRS, subordinated liabilities are initially recognised at issue proceeds and subsequently measured at amortised cost. Under Solvency II, subordinated debt is valued on a fair value basis, with changes in own credit standing removed for subsequent measurement.

The European Group has the following subordinated debt notes in issue at 30<sup>th</sup> November 2018:

- £300m subordinated debt issued by AHEL to AIG International Holdings GmbH (AIGIH)

Subordinated Liabilities	£'m
AHEL Solo	(300)
AEL	(0.0)
Other Subsidiaries	(15.0)
Consolidation Adjustment	15.0
<b>AHEL Consolidated</b>	<b>(300.0)</b>

The consolidation adjustment of £15.0m represents the elimination of intragroup subordinated liabilities. AEL's subordinated liabilities were fully paid off during Q4 2018 and so there were no more debts as at 30 November 2018.

## AIG EUROPE LIMITED

At 30<sup>th</sup> November 2018, AEL had in issue a £0.0m subordinated debt note with AIGIH.

Note 15: Subordinated Liabilities, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	(300.0)

## AMERICAN INTERNATIONAL GROUP UK LIMITED

At 30<sup>th</sup> November 2018, AIG UK had no subordinated liabilities.

Note 15: Subordinated Liabilities, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	(300.0)

## DEFERRED TAX LIABILITIES

## EUROPEAN GROUP

Refer to Note 7 for the IFRS and Solvency II valuation principles in respect of deferred taxes.

The table below shows the split of the European Group's deferred tax liabilities between AEL and other component entities.

Deferred Tax Liabilities	£'m
AEL	(32.57)
Other Subsidiaries	(35.92)
<b>AHEL Consolidated</b>	<b>(68.49)</b>

## AIG EUROPE LIMITED

The table below shows the reclassification and valuation adjustments made to deferred tax liabilities at 30<sup>th</sup> November 2018.

At 30<sup>th</sup> November 2018, £9.7m reclassification adjustment was made to net down the deferred tax position within each country.

In addition there was a £(5.1)m valuation adjustment in respect of the temporary valuation differences between IFRS and Solvency II.

Note 16: Deferred Tax Liabilities, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	(36.98)	9.56	(5.15)	(32.57)	(68.49)

## AMERICAN INTERNATIONAL GROUP UK LIMITED

At 30<sup>th</sup> November 2018, AIG UK had no deferred tax liabilities.

Note 16: Deferred Tax Liabilities, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	(68.49)

## DEPOSIT FROM REINSURERS

## EUROPEAN GROUP

Deposits from reinsurers are measured at amortised cost under IFRS. The amortised cost valuation is taken to approximate fair value for Solvency II purposes.

The table below shows the split of the European Group's deposits from reinsurers between AEL and other component entities.

Deposits from Reinsurers	£'m
AEL	(4.9)
Other Subsidiaries	(54.07)
<b>AHEL Consolidated</b>	<b>(58.97)</b>

## AIG EUROPE LIMITED

At 30<sup>th</sup> November 2018, there were no differences between IFRS and Solvency II for deposits from reinsurers.

Note 17: Deposit From Reinsurers, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	(4.9)	0.0	0.0	(4.9)	(58.97)

## AMERICAN INTERNATIONAL GROUP UK LIMITED

At 30<sup>th</sup> November 2018, there were no differences between UK GAAP and Solvency II for deposits from reinsurers.

Note 17: Deposit From Reinsurers, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	(58.97)

## REINSURANCE PAYABLE

## EUROPEAN GROUP

(Re)insurance payables represent the sum of creditors arising out of direct insurance and reinsurance operations. The European Group's (re)insurance payables are all due within 12 months. Owing to their short term nature, the amortised cost valuation under IFRS is taken to approximate fair valuation. Under Solvency II, (re)insurance payables form part of the future premium cash flows which make up the "gross premium provisions" component of the Solvency II technical provisions.

The table below shows the split of the European Group's (re)insurance payables between AEL and other component entities.

Insurance and Intermediaries Payables	£'m
AEL	0.0
Other Subsidiaries	(5.59)
<b>AHEL Consolidated</b>	<b>(5.59)</b>
Reinsurance Payable	£'m
AEL	0.0
Other Subsidiaries	(92.86)
<b>AHEL Consolidated</b>	<b>(92.86)</b>

## AIG EUROPE LIMITED

The table below shows the reclassification and valuation adjustments made to (re)insurance payables at 30<sup>th</sup> November 2018.

Insurance and Intermediaries Payables, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	(92.63)	92.63	0.0	0.0	(5.59)

At 30<sup>th</sup> November 2018, £92.6m of net insurance payables counted towards future cash flows and were reclassified to technical provisions under Solvency II.

Reinsurance Payable, £'m	AEL IFRS	AEL Reclassification Adjustments	AEL Solvency II Valuation Adjustments	AEL SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	(598.7)	515.5	83.2	0.0	(92.86)

At 30<sup>th</sup> November 2018, £598.7m was reclassified from reinsurance payables to Solvency II technical provisions.

## AMERICAN INTERNATIONAL GROUP UK LIMITED

The table below shows the reclassification and valuation adjustments made to (re)insurance payables at 30<sup>th</sup> November 2018.

Insurance and Intermediaries Payables, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	(5.59)

At 30<sup>th</sup> November 2018, £0.0m of net insurance payables counted towards future cash flows and were reclassified to technical provisions under Solvency II.

Reinsurance Payable, £'m	AIG UK UK GAAP	AIG UK Reclassification Adjustments	AIG UK Solvency II Valuation Adjustments	AIG UK SII Value	SII Value European Group Consolidated
Balance as at 30 November 2018	0.0	0.0	0.0	0.0	(92.86)

At 30<sup>th</sup> November 2018, no reinsurance payables were reclassified to Solvency II technical provisions.

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

Alternative valuation methods, as defined in the Solvency II regulations, are applied in the fair valuation of the following assets of the European Group, AEL and AIG UK:

- Loans and mortgages;
- Property, plant and equipment.

The details around these alternative valuation methods are disclosed in Note 2: Loans and Mortgages and Note 6: Property, plant and equipment.

#### **D.5 OTHER MATERIAL INFORMATION**

No other information to report.



## Solvency & Financial Condition Report 2018

### E. Capital Management

The 'Capital Management' section of the report describes the internal operational structures/procedures underlying capital management within the Company as well as the projections of capital position over a three year planning horizon.

The Capital Plan is updated at least annually or more frequently if a material change occurs to the Company's risk or capital profile, business strategy, the macro-economic outlook or if regulatory feedback warrants a change.

#### KEY ELEMENTS OF THE SECTION ARE:

- Own Funds;
- SCR and MCR; and
- Non-compliance with SCR and MCR.

## E. CAPITAL MANAGEMENT

### E.1 OWN FUNDS

The European Group uses a combination of basic and ancillary own funds to meet its Solvency II capital requirements:

- Basic own funds – net assets on the balance sheet and subordinated debt.
- Ancillary own funds - off balance sheet items that may be called up to absorb losses (e.g. letters of credit).

#### COMPOSITION AND QUALITY OF OWN FUNDS

##### EUROPEAN GROUP

The European Group's own funds are divided into three tiers based on set criteria relating to permanence and loss absorbency, with Tier 1 being of the highest quality.

The composition and total available own funds for the European Group as at 30<sup>th</sup> November 2018 is provided below:

£'m	Tier 1 Unrestricted	Tier 1 Restricted	Tier 2	Tier 3	Total
Ordinary Share Capital	72.92	0.0	0.0	0.0	72.92
Share Premium Account related to Ordinary Share Capital	0.0	0.0	0.0	0.0	0.0
Reconciliation Reserve	2,972.25	0.0	0.0	0.0	2,972.25
Subordinated Liabilities	0.0	0.0	300.0	0.0	300.0
Letters of Credit (Ancillary Own Funds)	0.0	0.0	316.51	0.0	316.51
Net Deferred Tax Assets	0.0	0.0	0.0	73.81	73.81
<b>Total Available Own Funds</b>	<b>3,045.17</b>	<b>0.0</b>	<b>616.51</b>	<b>73.81</b>	<b>3,735.49</b>
<b>2017 Comparative - £'m</b>	<b>Tier 1 Unrestricted</b>	<b>Tier 1 Restricted</b>	<b>Tier 2</b>	<b>Tier 3</b>	<b>Total</b>
Ordinary Share Capital	59.4	0.0	0.0	0.0	59.4
Share Premium Account related to Ordinary Share Capital	4,099.8	0.0	0.0	0.0	4,099.8
Reconciliation Reserve	(1,996.3)	0.0	0.0	0.0	(1,996.3)
Subordinated Liabilities	0.0	0.0	1,137.2	0.0	1,137.2
Letters of Credit (Ancillary Own Funds)	0.0	0.0	642.6	0.0	642.6
Net Deferred Tax Assets	0.0	0.0	0.0	74.9	74.9
<b>Total Available Own Funds</b>	<b>2,162.9</b>	<b>0.0</b>	<b>1,779.8</b>	<b>74.9</b>	<b>4,017.6</b>

##### AIG EUROPE LIMITED

The composition and total available own funds for the Company as at 30<sup>th</sup> November 2018 is provided below:

£'m	Tier 1 Unrestricted	Tier 1 Restricted	Tier 2	Tier 3	Total
Ordinary Share Capital	199.30	0.0	0.0	0.0	199.30
Share Premium Account related to Ordinary Share Capital	0.0	0.0	0.0	0.0	0
Reconciliation Reserve	2,680.92	0.0	0.0	0.0	2,680.92
Subordinated Liabilities	0.0	0.0	0.0	0.0	0
Letters of Credit (Ancillary Own Funds)	0.0	0.0	300.0	0.0	300.0
Net Deferred Tax Assets	0.0	0.0	0.0	83.98	83.98
<b>Total Available Own Funds</b>	<b>2,880.22</b>	<b>0.0</b>	<b>300.0</b>	<b>83.98</b>	<b>3,264.2</b>
<b>2017 Comparative - £'m</b>	<b>Tier 1 Unrestricted</b>	<b>Tier 1 Restricted</b>	<b>Tier 2</b>	<b>Tier 3</b>	<b>Total</b>
Ordinary Share Capital	197.1	0.0	0.0	0.0	197.1
Share Premium Account related to Ordinary Share Capital	1,460.3	0.0	0.0	0.0	1,460.3
Reconciliation Reserve	1,272.2	0.0	0.0	0.0	1,272.2
Subordinated Liabilities	0.0	0.0	37.2	0.0	37.2
Letters of Credit (Ancillary Own Funds)	0.0	0.0	616.7	0.0	616.7
Net Deferred Tax Assets	0.0	0.0	0.0	92.5	92.5
<b>Total Available Own Funds</b>	<b>2,929.6</b>	<b>0.0</b>	<b>653.9</b>	<b>92.5</b>	<b>3,676.0</b>

## AMERICAN INTERNATIONAL GROUP UK LIMITED

The composition and total available own funds for the Company as at 30<sup>th</sup> November 2018 is provided below:

£'m	Tier 1 Unrestricted	Tier 1 Restricted	Tier 2	Tier 3	Total
Ordinary Share Capital	0.04	0.0	0.0	0.0	0.04
Share Premium Account related to Ordinary Share Capital	3.66	0.0	0.0	0.0	3.66
Reconciliation Reserve	(0.02)	0.0	0.0	0.0	(0.02)
Subordinated Liabilities	0.0	0.0	0.0	0.0	0
Letters of Credit (Ancillary Own Funds)	0.0	0.0	0.0	0.0	0
Net Deferred Tax Assets	0.0	0.0	0.0	0.0	0.0
<b>Total Available Own Funds</b>	<b>3.68</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>3.68</b>
<b>2017 Comparative - £'m</b>	<b>Tier 1 Unrestricted</b>	<b>Tier 1 Restricted</b>	<b>Tier 2</b>	<b>Tier 3</b>	<b>Total</b>
Ordinary Share Capital	0.0	0.0	0.0	0.0	0.0
Share Premium Account related to Ordinary Share Capital	0.0	0.0	0.0	0.0	0.0
Reconciliation Reserve	0.0	0.0	0.0	0.0	0.0
Subordinated Liabilities	0.0	0.0	0.0	0.0	0.0
Letters of Credit (Ancillary Own Funds)	0.0	0.0	0.0	0.0	0.0
Net Deferred Tax Assets	0.0	0.0	0.0	0.0	0.0
<b>Total Available Own Funds</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

## TIER 1 BASIC OWN FUNDS

## EUROPEAN GROUP

At 30 November 2018, the European Group's Tier 1 Basic Own Funds were made up of the following items:

- Ordinary share capital.
- Solvency II reconciliation reserve.

AHEL's ordinary share capital is classified as Tier 1 unrestricted capital as its Articles of Association do not prohibit the cancellation of dividends after they have been declared.

The European Group's reconciliation reserve is made up of the remainder of the excess of assets over liabilities and is classified as Tier 1 capital in accordance with the Solvency II regulations. The table below sets out the components of the reconciliation reserve:

Reconciliation Reserve	£'m
Excess of assets over liabilities	3,143.52
Less:	
Ordinary Share Capital	(72.92)
Share Premium Account	0.0
Net Deferred Tax Assets	(73.81)
Other non-available own funds	(24.54)
<b>Reconciliation Reserve</b>	<b>2,972.25</b>

## AIG EUROPE LIMITED

AEL's ordinary share capital and related share premium are classified as Tier 1 unrestricted capital as its Articles of Association do not prohibit the cancellation of dividends after they have been declared.

AEL's reconciliation reserve is classified as Tier 1 capital in accordance with the Solvency II regulations. The table below sets out the components of the reconciliation reserve:

Reconciliation Reserve	£'m
Excess of assets over liabilities	2,964.20
Less:	
Ordinary Share Capital	(199.30)
Net Deferred Tax Assets	(83.98)
<b>Reconciliation Reserve</b>	<b>2,680.92</b>

## AMERICAN INTERNATIONAL GROUP UK LIMITED

The table below sets out the components of the reconciliation reserve:

Reconciliation Reserve	£'m
Excess of assets over liabilities	3.68
Less:	
Ordinary Share Capital	(3.70)
Net Deferred Tax Assets	0.0
<b>Reconciliation Reserve</b>	<b>(0.02)</b>

Tier 2 Basic Own Funds  
EUROPEAN GROUP

At 30<sup>th</sup> November 2018, the European Group's Tier 2 basic own funds were made up of the following subordinated debt:

Subordinated Debt	Maturity	£'m
£300.0m of subordinated debt issued by AHEL to AIGIH	2 June 2026	300.0
<b>Tier 2 Basic Own Funds</b>		<b>300.0</b>

There have been no issuances or redemptions of Tier 2 subordinated debt during 2018.

## AIG EUROPE LIMITED

At 30<sup>th</sup> November 2018, AEL's Tier 2 basic own funds were made up of the following subordinated debt:

Subordinated Debt	Maturity	£'m
		0.0
<b>Tier 2 Basic Own Funds</b>		<b>0.0</b>

There have been no issuances or redemptions of Tier 2 subordinated debt during 2018.

## AMERICAN INTERNATIONAL GROUP UK LIMITED

At 30<sup>th</sup> November 2018, AIG UK's Tier 2 basic own funds were made up of the following subordinated debt:

Subordinated Debt	Maturity	£'m
		0.0
<b>Tier 2 Basic Own Funds</b>		<b>0.0</b>

There have been no issuances or redemptions of Tier 2 subordinated debt during 2018.

## Tier 2 Ancillary Own Funds

Own funds that do not fall within the definition of basic own funds are known as ancillary own funds.

These are off balance sheet items, e.g. letters of credit or commitments to provide funds to an insurer, which if called upon, would increase basic own funds. Such items can only be used to cover the SCR and are not eligible to cover the MCR.

## EUROPEAN GROUP

At 30<sup>th</sup> November 2018, the European Group had the following Letters of Credit (LOCs) in place:

Letters of Credit	PRA approval period	£'m
£300m of LOCs issued to AEL (£100m each)	19 October 2015 - 1 January 2020	300.0
£16.5m of LOCs issued to AIG Life	17 June 2016 - 1 January 2020	16.5
<b>Total Letters of Credit</b>		<b>316.5</b>

All the LOCs are provided by external banks. The terms of the LOCs enable AEL and AIG Life to call in up to the agreed guarantee amounts on demand. The banks in turn recover funds from AIG, Inc. in its capacity as applicant and guarantor.

## AIG EUROPE LIMITED

At 30<sup>th</sup> November 2018, AEL had the following LOCs in place:

Letters of Credit	PRA approval period	£'m
£300m of LOCs issued to AEL (£100m each)	19 October 2015 - 1 January 2020	300.0
<b>Total Letters of Credit</b>		<b>300.0</b>

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

At 30<sup>th</sup> November 2018, AIG had the following LOCs in place:

Letters of Credit	PRA approval period	£'m
		0.0
<b>Total Letters of Credit</b>		<b>0.0</b>

**Tier 3 Basic Own Funds****EUROPEAN GROUP**

At 30<sup>th</sup> November 2018, the European Group had net deferred tax assets of £72.92m on its Economic Balance Sheet, all of which counted towards its Tier 3 basic own funds.

**AIG EUROPE LIMITED**

At 30<sup>th</sup> November 2018, AEL had net deferred tax assets of £83.98m on its Economic Balance Sheet, all of which counted towards its Tier 3 basic own funds.

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

At 30<sup>th</sup> November 2018, AIG UK had net deferred tax assets of £0.0m on its Economic Balance Sheet, all of which counted towards its Tier 3 basic own funds.

**ELIGIBLE OWN FUNDS****EUROPEAN GROUP**

At 30<sup>th</sup> November 2018, the European Group's total eligible own funds to cover the Group SCR was less than the total available own funds due to tiering limit restrictions.

£'m	Total	Tier 1 (unrestricted)	Tier 1 (restricted)	Tier 2	Tier 3
Total eligible own funds to meet the SCR	3,735.49	3,045.17	0.0	616.51	73.81
Total available own funds to meet the SCR	3,735.49	3,045.17	0.0	616.51	73.81

**AIG EUROPE LIMITED**

At 30<sup>th</sup> November 2018, AEL's total eligible own funds to meet its SCR was less than the total available own funds due to tiering limit restrictions.

£'m	Total	Tier 1 (unrestricted)	Tier 1 (restricted)	Tier 2	Tier 3
Total eligible own funds to meet the SCR	3,264.2	2,880.22	0.0	300.0	83.98
Total available own funds to meet the SCR	3,264.2	2,880.22	0.0	300.0	83.98

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

At 30<sup>th</sup> November 2018, AEL's total eligible own funds to meet its SCR was less than the total available own funds due to tiering limit restrictions.

£'m	Total	Tier 1 (unrestricted)	Tier 1 (restricted)	Tier 2	Tier 3
Total eligible own funds to meet the SCR	3.68	3.68	0.0	0.0	0.0
Total available own funds to meet the SCR	3.68	3.68	0.0	0.0	0.0

**FUNGIBILITY AND TRANSFERABILITY OF OWN FUNDS****EUROPEAN GROUP**

At 30<sup>th</sup> November 2018, the European Group recognised £24.5 of restriction in respect of the fungibility and transferability of the group own funds. This is in respect of the portion of AIG Israel's own funds which were effectively not available to cover the Group SCR due to local regulations.

**AIG EUROPE LIMITED**

At 30<sup>th</sup> November 2018, the Company did not have any restrictions in respect of the fungibility and transferability of its own funds.

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

At 30<sup>th</sup> November 2018, the Company did not have any restrictions in respect of the fungibility and transferability of its own funds.

**MATERIAL DIFFERENCES BETWEEN EQUITY IN THE FINANCIAL STATEMENTS AND THE EXCESS OF ASSETS OVER LIABILITIES EUROPEAN GROUP**

AHEL has taken advantage of the exemption available under Section 401 of Companies Act 2006 from the requirement to produce consolidated financial statements. Therefore, the requirement to disclose material differences between equity in financial statements and the excess of assets over liabilities is not applicable to the European Group.

**AIG EUROPE LIMITED**

The table below sets out the material differences between equity in the financial statements and the excess of assets and liabilities calculated under Solvency II.

Difference between IFRS and SII net assets	£'m
Difference arising from SII valuation of assets	(2,218.48)
Difference arising from SII valuation of technical provisions	1,237.20
Difference arising from SII valuation of other liabilities	787.01
Total of reserves and retained earnings from financial statements	2,959.17
<b>Reserves from financial statements adjusted for Solvency II valuation differences</b>	<b>2,764.90</b>
Ordinary share capital	199.30
Share premium account related to ordinary share capital	0
<b>Excess of assets over liabilities</b>	<b>2,964.20</b>

The difference arising from SII valuation of assets include the elimination of intangible assets and deferred acquisition costs.

The difference arising from SII valuation of technical provisions is due to the remeasurement of technical provisions on a discounted best estimate basis and the inclusion of risk margin on the SII balance sheet.

The difference arising from SII valuation of other liabilities includes the impact on deferred tax of the valuation adjustments described above.

#### AMERICAN INTERNATIONAL GROUP UK LIMITED

The table below sets out the material differences between equity in the financial statements and the excess of assets and liabilities calculated under Solvency II.

Difference between UK GAAP and SII net assets	£'m
Difference arising from SII valuation of assets	0.0
Difference arising from SII valuation of technical provisions	0.0
Difference arising from SII valuation of other liabilities	0.0
Total of reserves and retained earnings from financial statements	0.0
<b>Reserves from financial statements adjusted for Solvency II valuation differences</b>	<b>0.0</b>
Ordinary share capital	0.02
Share premium account related to ordinary share capital	3.66
<b>Excess of assets over liabilities</b>	<b>3.68</b>

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

On 27th September 2018, AIG Holding Europe Limited received approval from the PRA of the major changes to their Internal Model effective from 1st December 2018. The American International Group UK Limited received approval from the PRA on 27th September 2018 to calculate its Solvency Capital Requirement using the Internal Model in place of the Standard Formula.

The European Group's SCR at 30 November 2018 was £2.8m. The table below shows a breakdown of the European Group's SCR by risk and diversification benefit. The European Group uses a Partial Internal Model which is made up from entities that use Internal Model and Standard Formula.

A detailed analysis of the SCR and its components is disclosed in the Risk Profile section.

European Group SCR £'m	AIG UK	AEL	AHEL	AIG Life	AIG Israel	Standard	Group SCR
	Standalone	Standalone*	Partial Internal Model *	Y/E 2018	Y/E 2018	Formula Consolidated	
	Y/E 2018	Y/E 2018	Y/E 2018	Y/E 2018	Y/E 2018	Y/E 2018	Y/E 2018
Insurance risk	0.0	1,964	2,012	105.3	165.4	251.4	2,263
Market risk	0.0	678	680	17.7	49.2	78.2	758
Credit risk	0.5	214	214	17.0	23.5	36.0	250
Operational risk	0.0	281	281	11.1	8.2	16.2	297
Pension risk	0.0	69	83	0.0	0.0	0.0	83
Loss Absorbing capacity of deferred taxes	0.0	(17)	(17)	(4.6)	(31.7)	(33.2)	(50)
Diversification	0.0	(786)	(799)	(40.1)	(92.7)	(139.5)	(939)
Planned UW Profit	0.0	120	120	0.0	0.0	0.0	120
<b>Total SCR</b>	<b>0.5**</b>	<b>2,524</b>	<b>2,574</b>	<b>106.4</b>	<b>121.9</b>	<b>209.1</b>	<b>2,783</b>

\* As AHSL applied for a Major Model Change in 2018 in agreement with the PRA AEL's and AHSL's internal models were frozen to the capital requirements submitted as part of the application.

\*\* Even though the SCR is £0.5m the Company has to hold capital equivalent to the MCR which is calculated at £3.3m. Details of the MCR calculation are provided in section E.2.2 Minimum Capital Requirement.

**E.2.2 MINIMUM CAPITAL REQUIREMENT (MCR)****EUROPEAN GROUP**

The Group MCR represents a minimum level below which the inputs used for the calculation of Group MCR are provided in the table below:

- The amount of resources should not fall. It is calculated in accordance with the Standard Formula, which is subject to a defined floor and cap based on the risk-based Solvency Capital Requirement.
- The European Group MCR for the reporting period is £1,320.1m. This is simply the sum of the respective Solo MCRs of AEL, AIG UK, AIG Life and AIG Israel.

**AIG EUROPE LIMITED**

The Company uses the Standard Formula to calculate its Minimum Capital Requirement (MCR). The amount of the MCR for the reporting period is £1,135.6m.

The inputs used for the calculation of Group MCR are provided in the table below:

MCR Components	£'m
AEL Solo MCR	1,135.6
AIG UK Solo MCR	3.3
AIG Life Solo MCR	45.3
AIG Israel Solo MCR	135.9
<b>Group MCR</b>	<b>1,320.1</b>

The following table shows the MCR calculation:

Overall MCR calculation	£'m
Linear MCR	1,241.25
SCR	2,523.56
MCR cap	1,135.6
MCR floor	630.89
Combined MCR	1,135.6
Absolute floor of the MCR	3.29
<b>Minimum Capital Requirement</b>	<b>1,135.6</b>

Calculation of MCR (inputs) (£m)	Net (of reinsurance) best estimate provisions	Net (of reinsurance) written premiums in the last 12 months
Medical expense insurance and proportional reinsurance	18.73	67.20
Income protection insurance and proportional reinsurance	209.09	333.06
Workers' compensation insurance and proportional reinsurance	55.48	0.58
Motor vehicle liability insurance and proportional reinsurance	456.1	327.78
Other motor insurance and proportional reinsurance	74.48	36.69
Marine, aviation and transport insurance and proportional reinsurance	550.78	357.05
Fire and other damage to property insurance and proportional reinsurance	1,151.81	956.43
General liability insurance and proportional reinsurance	5,015.05	1,420.82
Credit and suretyship insurance and proportional reinsurance	76.87	49.08
Legal expenses insurance and proportional reinsurance	0.0	0.0
Assistance and proportional reinsurance	5.61	33.33
Miscellaneous financial loss insurance and proportional reinsurance	191.69	94.19
Non-proportional health reinsurance	0.0	0.0
Non-proportional casualty reinsurance	38.16	56.53
Non-proportional marine, aviation and transport reinsurance	10.90	8.90
Non-proportional property reinsurance	53.94	45.41

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

The Company uses the Standard Formula to calculate its Minimum Capital Requirement (MCR). The amount of the MCR for the reporting period is £3.29m.

The following table shows the MCR calculation:

Overall MCR calculation	£'m
Linear MCR	0.0
SCR	0.54
MCR cap	0.24
MCR floor	0.14
Combined MCR	0.14
Absolute floor of the MCR	3.29
<b>Minimum Capital Requirement</b>	<b>3.29</b>

The Company's MCR is higher than the SCR due to the PRA's requirement to hold an MCR of no less than €3,700,000<sup>1</sup>. The MCR has been converted to GBP using the PRA's published exchange rates.<sup>2</sup>

Calculation of MCR (inputs) (£m)	Net (of reinsurance) best estimate provisions	Net (of reinsurance) written premiums in the last 12 months)
Medical expense insurance and proportional reinsurance	0.0	0.0
Income protection insurance and proportional reinsurance	0.0	0.0
Workers' compensation insurance and proportional reinsurance	0.0	0.0
Motor vehicle liability insurance and proportional reinsurance	0.0	0.0
Other motor insurance and proportional reinsurance	0.0	0.0
Marine, aviation and transport insurance and proportional reinsurance	0.0	0.0
Fire and other damage to property insurance and proportional reinsurance	0.0	0.0
General liability insurance and proportional reinsurance	0.0	0.0
Credit and suretyship insurance and proportional reinsurance	0.0	0.0
Legal expenses insurance and proportional reinsurance	0.0	0.0
Assistance and proportional reinsurance	0.0	0.0
Miscellaneous financial loss insurance and proportional reinsurance	0.0	0.0
Non-proportional health reinsurance	0.0	0.0
Non-proportional casualty reinsurance	0.0	0.0
Non-proportional marine, aviation and transport reinsurance	0.0	0.0
Non-proportional property reinsurance	0.0	0.0

<sup>1</sup> PRA Rulebook [http://www.prarulebook.co.uk/rulebook/Media/Get/1c2b953f-ca88-454d-b4ae-d936f9f3c9ec/PRA\\_2015\\_16/pdf](http://www.prarulebook.co.uk/rulebook/Media/Get/1c2b953f-ca88-454d-b4ae-d936f9f3c9ec/PRA_2015_16/pdf)

<sup>2</sup> PRA publication – Euro Sterling value for insurance regulatory purposes: <https://www.bankofengland.co.uk/-/media/boe/files/prudential-regulation/regulatory-reporting/insurance/euro-sterling-value-for-insurance-regulatory-purposes>

## APPROACH TO CAPITAL MANAGEMENT

### EUROPEAN GROUP

The European Group recognises the SCR as the minimum capital level. It aims to hold a target capital buffer over and above this minimum capital level to limit the possibility of breaching the minimum capital level.

### AIG EUROPE LIMITED AND AMERICAN INTERNATIONAL GROUP UK LIMITED

Capital management focuses on two aspects:

- ensuring that there is sufficient coverage of both the regulatory capital requirements (MCR and SCR) as well as the economic capital targets set; and
- optimisation of the quality of available Own Funds, in respect of the capital position of the organisation and also in the context of the wider European and worldwide Group.

The Finance function provides the Board and Risk and Capital Committee (RCC) with information on the Company's capital position and monitors the surplus in line with internal, regulatory and rating agency capital requirements. The Capital Management department also works alongside Enterprise Risk Management to conduct group internal and regulatory stress and scenario testing. The governance and oversight of the capital management process is laid out in the subsection System of Governance.

## CAPITAL MANAGEMENT PLAN

### EUROPEAN GROUP

The European Group's insurance subsidiaries are regulated and capitalised individually in order to meet their respective regulatory and other capital needs. Each insurance subsidiary produces an Individual Capital Plan at least annually, on which the European Group Capital Plan is built.

The European Group Capital Plan covers the following:

- Regulatory and target minimum capital levels.
- Capital structure.
- Capital projections under baseline and stressed scenarios.
- Stress and scenario analysis.

The European Group Capital Plan is updated and approved by the Board annually, or more frequently if there are material changes in circumstances.

### AIG EUROPE LIMITED AND AMERICAN INTERNATIONAL GROUP UK LIMITED

The Company produces an annual Capital Management Plan, which sets out target capital parameters and strategy to be maintained over a three year business planning horizon. The intention of the plan is to ensure the Company meets regulatory capital requirements and other business expectations such as dividend payments to the AIG Group parent whilst also optimising capital efficiency.

The Company Capital Plan aims to:

- Document the regulatory and internal minimum capital levels and show capital projections under baseline and stressed scenarios.
- Support the dividend plan.
- Describe the capital implications and actions required in the event that a stress scenario occurs.

The Capital Plan covers a three-year planning horizon that takes into consideration:

- Multiple macroeconomic and financial market scenarios.
- Business and Strategic Plan, budget and goals.
- The European Group's overall capital level relative to its risk tolerance.
- Applicable regulations.
- Multiple future scenarios involving capital resources and requirements under the Solvency II Internal Model and Standard Formula views.

The Capital Plan is a complete and comprehensive analysis of the Company's capital sources and uses a three year time frame that takes into consideration:

- Multiple macroeconomic and financial market scenarios.
- Business and Strategic Plan, budget and goals.
- The Company's overall capital level relative to its risk tolerance.
- Applicable regulations.
- The Company's capital management goals.
- Multiple future scenarios involving capital resources and requirements under the Solvency II Internal Model and Standard Formula views.
- It presents the key facts with respect to the Company's assessment of capital adequacy, and analyses the impact of the proposed restructuring events and capital actions.

## CAPITAL MANAGEMENT PROCESS AND POLICY

### EUROPEAN GROUP

The European Group has an active capital management process which aims to ensure it meets regulatory capital requirements while optimising capital efficiency.

The Capital Management Policy document establishes a formal capital assessment and management framework encompassing the following aspects of capital management:

- Ensuring adequate capital is maintained within the European Group to meet regulatory requirements and ensuring capital is available to support strategic plans.
- Optimising the European Group's sources and usage of capital.
- Ensuring any excess capital is returned to AIG Group on a timely basis without compromising the other objectives, as above.

### AIG EUROPE LIMITED AND AMERICAN INTERNATIONAL GROUP UK LIMITED

Each Company has a Capital Management Policy in place which is approved annually by the Board, concerned with all matters relating to the capital level and capital structure of the Company. It establishes a formal capital assessment and management framework in order to achieve the following objectives:

- Ensuring adequate capital is maintained within the Company to meet regulatory and rating agency requirements and ensuring capital is available to support strategic plans.
- Enabling the Company to follow and meet its rating agency strategy and in particular to achieve its target ratings.

- Optimising the Company's sources and usage of capital.
- Ensuring that excess capital is returned to Group on a timely basis without compromising the other objectives, as above.
- The Capital Management Policy pertains to capital level and capital structure.
- Cover the PRA's requested amount above Minimum Capital Level
- Cover the risk appetite approved by the Board as part of the Risk Appetite Framework. This is currently set at a 1 in 7 year financial scenario
- Meet the total level of capital necessary to achieve an 'A' rating from A.M. Best.
- The Company has an active capital management process to ensure it meets regulatory capital requirements and rating agency expectations while optimising capital efficiency by returning "excess" capital to its parent.

The PRA authorised AIG Europe Limited to hold £617m of the capital buffer in the form of a Letter of Credit (LOC) whilst the balancing amount of the buffer is covered by called up capital.

### **E.3 USE OF DURATION-BASED EQUITY RISK SUB-MODULE IN THE CALCULATION OF THE SOLVENCY CAPITAL REQUIREMENT EUROPEAN GROUP**

The European Group did not make use of the duration-based equity risk sub-module in the reporting during the reporting period.

#### **AIG EUROPE LIMITED**

The Company did not make use of the duration-based equity risk sub-module in the reporting during the reporting period.

#### **AMERICAN INTERNATIONAL GROUP UK LIMITED**

The Company did not make use of the duration-based equity risk sub-module in the reporting during the reporting period.

### **E.4 DIFFERENCES BETWEEN THE STANDARD FORMULA AND ANY INTERNAL MODEL USED**

#### **EUROPEAN GROUP**

The European Group uses a Partial Internal Model in the calculation of its SCR.

#### **AIG EUROPE LIMITED**

The Company uses Internal Model to calculate the SCR.

The key drivers of the differences between the Standard Formula SCR and Internal Model SCR are as follows:

- **Different Calculation Basis:** The most basic difference between the Standard Formula and AEL's Internal Model is the general approach taken to calculating the Solvency Capital Requirement. The standard formula broadly takes a deterministic, shock based approach (e.g. shocks to asset values, premiums and reserves) to reach an aggregate 99.5% loss.

The Internal Model however takes a stochastic simulation based approach, which delivers a full P&L distribution (probability distribution forecast) from which a 99.5% loss can be derived. At lower return periods of loss, like for like comparisons can be difficult as the Standard Formula is only focused at the 99.5th percentile.

- **Dependency Structure – Correlation & Diversification:** The Standard Formula has been developed to reflect the risk profile of an average European-centric insurer; as a result it does not provide full recognition of risk diversification available to a firm such as AEL. For example when modelling Insurance Risk the Standard Formula does not fully allow for the level of line of business and geographical diversification inherent within AEL Insurance Risk profile.

The Standard Formula SCR is a one size fits all capital calculation model which provides standardised risk modules calculated using a number of pre-determined factors called helper tabs and aggregated through EIOPA-specified correlation matrices.

Whilst the Standard Formula SCR is a good fit for most small to medium insurance firms with relatively low variety of insurance product offerings and straightforward investment strategy, it has inherent limitations. The Standard Formula SCR is more rigidly defined, formulaic and not calibrated to accurately reflect the complexities of a diverse multinational insurance firm such as AEL.

AEL ensure all risk types are appropriately modelled and calibrated to meet the potential outcomes from their own risk profile.

#### **Premium Risk (Non Cat)**

The modelling of separate capped and excess losses allows AEL to model reinsurance explicitly based on treaties that are in place. Facultative and captive reinsurance are modelled using a factor/proportional based approach. Excess of Loss reinsurance is modelled on a claim by claim basis.

Using historical loss data split by line of business into homogeneous groups (claims with the same underlying behaviour), loss ratio data is adjusted for changes in rates and inflation.

The process is calibrated by Corporate Actuarial and reviewed by Pricing Actuaries and their profit centres, with guidance on techniques and tools from the Economic Capital Modelling team. This ensures alignment with the pricing and reserving process.

#### **Premium Risk (Natural Catastrophes)**

AIG Europe predominantly utilises a third party Catastrophe Model to model the occurrence and severity of events for windstorm/hurricane, earthquake and flood.

The model uses actual exposure sets of individual in-force policies as a proxy for future exposures. Premium is used as a proxy for exposure and so for changing books the Nat CAT is scaled by change in on-levelled premium.

By modelling individual policies we are able to model more granularly, model facultative reinsurance explicitly and also deliver average cat loss by policy to aid premium setting.

### Premium Risk (Man made catastrophes)

Scenarios are developed for each threat based on a 1 in 40, 1 in 100 and 1 in 250 year return period.

Insurance claims arising from scenarios such as latent disease, terrorism, systemic financial markets events, products recall, pandemic, aircraft collision and other sources are all considered. These scenarios are usually based on events not experienced in our loss data, but some non-zero probability potential loss exists.

Multiple lines of business being impacted by one event is included within the derived scenarios.

Workshops with profit centre managers, risk officers and actuaries used to identify and determine scenario inputs.

The scenarios are calculated on a gross, gross less facultative and net basis.

An Expert Panel reviews and signs off on the scenarios

### Reserve Risk

The Reserve variability method is to re-project the reserve outcome thousands of times such that a range of reserve outcomes is produced.

The method that we use looks to mimic a re-reserving exercise following further development and payments modelled in each simulation.

Consistency of reserve risk calibration is discussed with other parts of AIG in particular the difference in outcome from using other available techniques.

A factor based approach is used to estimate risk on a one year time horizon vs. an ultimate time horizon perspective. A one year time horizon is used to calculate the Solvency II SCR.

The process is calibrated by Corporate Actuarial with guidance on techniques and tools from ECM. The reserve risk calibration process is done at the same time as that for premium risk ensuring consistency both in terms of data and approach.

Statistical distributions of reserve volatility are selected for each of the lines of business calibrated using historical data and expert judgement regarding the best fit going forward

### Market Risk

Systematic movements in market factors are produced by an external Economic Scenario Generator (ESG). As well as simulating systemic movements in individual market risk factors, the ESG also generates co-movements in market risk factors. These are an important component of the internal model dependency structure. The dependency between economic factors such as GDP and inflation are used for dependencies with other risk types.

The internal model provides several mechanisms by which by which movements in market risk factor can impact the Company:

- Valuation of invested assets
- Valuation of derivative instruments.
- Discounting of liabilities
- Insurance risk outcomes (i.e. inflation driving larger claims)
- Foreign exchange translations applied in the simulations of financial statements during SCR computations.

In addition to Interest Rate, Credit Spread, Equity and exchange rate risk, asset credit risk is included within the market risk sub-module. This also helps from a governance perspective since representatives from AIG investments are an integral part of market risk framework. Moreover, through co-ordination with AIG investment, AEL can influence both their market risk and invested asset credit risk profiles.

### Credit Risk

Credit risk is the risk that the value of a portfolio of assets and liabilities changes due to unexpected changes in the credit quality of issuers of assets, of a trading partner or a default of a third party in a credit insurance product.

For Solvency II within the credit risk category we are focusing on only reinsurer default credit risk and broker receivables. Reinsurer default credit risk includes risk from facultative, captive and treaty reinsurance.

Explicit modelling of probability of default and exposure to each reinsurance and broker counterparty is made. AIG assigns to each reinsurer in its reinsurance program a rating based on an internal credit risk assessment. Each counterparty is modelled separately within the model with groups grouped where appropriate.

### Operational Risk

Operational Risk is modelled through the development of a representative set of adverse scenarios, which are then used to model AIG Europe's Operational Risk Profile.

The scenarios are created and developed in Subject Matter Expert workshops with representatives from both the first line (Underwriting, Claims, Operations) and Second Line of Defence (ERM)

Three data points are defined for each scenario, setting out a frequency (return period) and expected impact. These data points are then used to create loss distributions for each scenario and in turn are used to calibrate the internal model operational risk module.

### Dependencies

Structural links are present where there is a cause-and-effect relationship between two modelled elements. For example gross claims and net claims have a structural dependency, as well as losses to different lines of business from the same catastrophic event.

Statistical dependencies are used to impose dependency between two items where similar joint behaviour of modelled items is expected, e.g. due to the economic environment.

Dependencies for Insurance Risk (Premium and Reserve Risk) are calibrated with reference to historical experience and external benchmarks, supplemented with an element of expert judgement.

Dependencies calibration for other risk modules (Operational Risk, Credit Risk and Market Risk) is normally a part of these modules' calibration process.

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

The Company at 30 November 2018 used the Standard Formula for the calculation of the Solvency Capital Requirement.

**E.5 NON-COMPLIANCE  
EUROPEAN GROUP**

During the reporting period, there were no instances of non-compliance with the Solvency II capital requirements. In addition, the European Group held Own Funds in excess of both the SCR and MCR requirements.

**AIG EUROPE LIMITED**

During the reporting period, there were no instances of non-compliance with the Solvency II capital requirements. In addition, the Company held Own Funds in excess of both the SCR and MCR requirements.

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

During the reporting period, there were no instances of non-compliance with the Solvency II capital requirements. In addition, the Company held Own Funds in excess of both the SCR and MCR requirements.

**E.6 ANY OTHER INFORMATION**

No other information to report.



## Solvency & Financial Condition Report 2018

### F. Appendices to the Solvency and Financial Condition Report

#### KEY ELEMENTS OF THE SECTION ARE:

- Glossary;
- AIG Holdings Europe Limited QRTs; and
- AIG Europe Limited QRTs; and
- American International Group UK Limited QRTs.

## F.1 GLOSSARY

## A

<b>AIG</b>	American International Group
<b>A&amp;H</b>	Accident and Health
<b>AAMEL</b>	AIG Asset Management (Europe) Limited
<b>AEL</b>	AIG Europe Limited (the Company)
<b>AFS</b>	Available for Sale
<b>AHEL</b>	AIG Holdings Europe Limited
<b>ALAE</b>	Allocated Loss Adjustment Expenses
<b>ALM</b>	Asset Liability Matching
<b>AMG</b>	Asset Management Group
<b>AOF</b>	Ancillary Own Funds
<b>AQI</b>	Account Quality Index
<b>AY</b>	Accident Year
<b>AYLR</b>	Accident Year Loss Ratio

## B

<b>BBNI</b>	Bound But Not Yet Incepted
<b>BIA</b>	Business Impact Analysis
<b>BCP</b>	Business Continuity Plan
<b>BoE</b>	Bank of England
<b>BOF</b>	Basic Own Funds
<b>BTA</b>	Business Travel Assistance
<b>BRC</b>	Board Risk Committee
<b>BSCR</b>	Basic Solvency Capital Requirement

## C

<b>CAT</b>	Catastrophe
<b>CBRA</b>	Category Based Risk Assessment
<b>CCAR</b>	Comprehensive Capital Analysis and Review
<b>CCO</b>	Chief Credit Officer
<b>CEE</b>	Central and Eastern Europe
<b>CEO</b>	Chief Executive Officer
<b>CFO</b>	Chief Financial Officer
<b>CMBS</b>	Commercial Mortgage Backed Security
<b>CMRC</b>	Compensation and Management Resources Committee
<b>COO</b>	Chief Operating Officer

<b>CoR</b>	Combined Operating Ratio
<b>CP</b>	Commercial Property
<b>CRB</b>	Criminal Records Bureau
<b>CRO</b>	Chief Risk Officer

## D

<b>D&amp;O</b>	Directors and Officers
<b>DAC</b>	Deferred Acquisition Costs
<b>DGC</b>	Data Governance Council
<b>DTA</b>	Deferred Tax Asset
<b>DTL</b>	Deferred Tax Liability

## E

<b>EBS</b>	Economic Balance Sheet
<b>ECG</b>	European Compliance Group
<b>ECM</b>	Economic Capital Model
<b>ECR</b>	Enhanced Capital Requirement
<b>EDGC</b>	European Data Governance Council
<b>EEA</b>	European Economic Area
<b>EIOPA</b>	European Insurance and Occupational Pensions Authority
<b>EL</b>	Employer's Liability
<b>EMEA</b>	Europe, Middle East and Africa
<b>ENID</b>	Events not in Data
<b>ERM</b>	Enterprise Risk Management
<b>EPIFP</b>	Expected Profit in Future Premiums
<b>EU</b>	European Union
<b>EUT</b>	End User Tools
<b>ExCo</b>	Executive Committee

## F

<b>FAC</b>	Facultative Reinsurance
<b>FCA</b>	Financial Conduct Authority
<b>FCG</b>	Financial Crime Group
<b>FCU</b>	Financial Control Unit
<b>FL</b>	Financial Lines
<b>FOE</b>	Freedom of Establishment
<b>FOS</b>	Freedom of Services
<b>FOS</b>	Financial Ombudsman Service
<b>FSMA</b>	Financial Services and Markets Act 2000

**FX** Foreign Exchange

## G

**GAAP** Generally Accepted Accounting Principles

**GCG** Global Compliance Group

**GDP** Gross Domestic Profit

**GL** General Liability

**GOE** Gross Operating Expenses

**GPE** Gross Premiums Earned

**GPW** Gross Premium Written

## H

**HR** Human Resources

**HSBC** Hongkong and Shanghai Banking Corporation

## I

**IAG** Internal Audit Group

**IBNR** Incurred but not Reported

**ICAS** Individual Capital Adequacy Standards

**ICG** Individual Capital Guidance

**IFRS** International Financial Reporting Standards

**ILS** Insurance Linked Securities

**IM** Internal Model

**IMA** Investment Management Agreement

**IMAP** Internal Model Approval Process

**ING** Internationale Nederlanden Groep

## K

**KRI** Key Risk Indicator

## L

**LAC - DT** Loss Absorbing Capacity of Deferred Taxes

**LCAR** Liquid Assets Coverage Ratio

**LCO** Local Compliance Officer

**LFL** Liability & Financial Lines

**LoB** Lines of Business

**LoC** Letters of Credit

**LTP** Late Travelling Period

**LUT** Large and Unusual Transactions

## M

**M&A** Mergers & Acquisitions

**M&T** Monitoring and Testing Group

**MCR** Minimum Capital Requirement

**MGA** Managing General Agent

**MI** Management Information

**MMC** Man-made Catastrophe

## N

**NB** New Business

**NII** Net Investment Income

**NPE** Net Premiums Earned

**NPW** Net Premiums Written

## O

**ORM** Operational Risk Management

**ORR** Obligor Risk Rating

**ORSA** Own Risk and Solvency Assessment

**OSP** Outsourcing Service Provider

## P

**P&L** Profit and Loss

**PI** Personal Insurance

**PP** Personal Property

**PPI** Payment Protection Insurance

**PPO** Periodic Payment Order

**PPP** Prudent Person Principle

**PRA** Prudential Regulation Authority

**PSR** Property & Special Risks

**PwC** PricewaterhouseCoopers

**PYD** Prior Year Development

## Q

**QRT** Quantitative Reporting Template

**R**

<b>RCC</b>	Risk and Capital Committee
<b>RCSA</b>	Risk and Control Self Assessment
<b>RDS</b>	Realistic Disaster Scenario
<b>RF</b>	Risk Free
<b>RI</b>	Reinsurance
<b>RM</b>	Risk Management
<b>RMF</b>	Risk Management Framework
<b>RMBS</b>	Residential Mortgage Backed Security
<b>ROE</b>	Return on Equity
<b>RT</b>	Risk transfer

**S**

<b>S&amp;P</b>	Standard and Poor's
<b>SAA</b>	Strategic Asset Allocation
<b>SCR</b>	Solvency Capital Requirement
<b>SFCR</b>	Solvency and Financial Condition Report
<b>SF-SCR</b>	Standard Formula - Solvency Capital Requirement
<b>SII</b>	Solvency II
<b>SIMR</b>	Senior Insurance Managers Regime
<b>SLA</b>	Service Level Agreement
<b>SME</b>	Small Medium Enterprise
<b>SST</b>	Stress and Scenario Testing

**T**

<b>TDC</b>	Total Direct Compensation
<b>TOM</b>	Target Operating Model

**U**

<b>UEPR</b>	Unearned Premium Reserve
<b>UK</b>	United Kingdom
<b>ULAE</b>	Unallocated Loss Adjustment Expenses
<b>UW</b>	Underwriting
<b>UWP</b>	Underwriting Profit

**V**

<b>VAT</b>	Value Added Tax
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**X**

<b>XoL</b>	Excess of Loss
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# AIG HOLDINGS EUROPE LIMITED

## Solvency and Financial Condition Report

### Disclosures

30 November

**2018**

(Monetary amounts in GBP thousands)

## General information

Participating undertaking name	AIG HOLDINGS EUROPE LIMITED
Group identification code	2138009EFBD5FYGFGB20
Type of code of group	LEI
Country of the group supervisor	GB
Language of reporting	en
Reporting reference date	30 November 2018
Currency used for reporting	GBP
Accounting standards	IFRS
Method of Calculation of the group SCR	Partial internal model
Method of group solvency calculation	Method 1 is used exclusively
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	Use of transitional measure on technical provisions

## List of reported templates

- S.02.01.02 - Balance sheet
- S.05.01.02 - Premiums, claims and expenses by line of business
- S.05.01.02 - Premiums, claims and expenses by line of business
- S.05.02.01 - Premiums, claims and expenses by country
- S.05.02.01 - Premiums, claims and expenses by country
- S.23.01.22 - Own Funds
- S.25.02.22 - Solvency Capital Requirement for groups using the standard formula and partial internal model
- S.32.01.22 - Undertakings in the scope of the group

## S.02.01.02

## Balance sheet

		Solvency II value
		C0010
	<b>Assets</b>	
R0030	Intangible assets	0
R0040	Deferred tax assets	142,300
R0050	Pension benefit surplus	33,899
R0060	Property, plant & equipment held for own use	141,509
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	10,457,405
R0080	<i>Property (other than for own use)</i>	0
R0090	<i>Holdings in related undertakings, including participations</i>	139,639
R0100	<i>Equities</i>	4,806
R0110	<i>Equities - listed</i>	0
R0120	<i>Equities - unlisted</i>	4,806
R0130	<i>Bonds</i>	10,233,761
R0140	<i>Government Bonds</i>	3,606,748
R0150	<i>Corporate Bonds</i>	6,627,013
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	0
R0180	<i>Collective Investments Undertakings</i>	78,958
R0190	<i>Derivatives</i>	1
R0200	<i>Deposits other than cash equivalents</i>	240
R0210	<i>Other investments</i>	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	393,856
R0240	<i>Loans on policies</i>	0
R0250	<i>Loans and mortgages to individuals</i>	419
R0260	<i>Other loans and mortgages</i>	393,437
R0270	Reinsurance recoverables from:	3,450,501
R0280	<i>Non-life and health similar to non-life</i>	2,826,731
R0290	<i>Non-life excluding health</i>	2,824,455
R0300	<i>Health similar to non-life</i>	2,276
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	623,770
R0320	<i>Health similar to life</i>	85,706
R0330	<i>Life excluding health and index-linked and unit-linked</i>	538,064
R0340	<i>Life index-linked and unit-linked</i>	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	34,008
R0370	Reinsurance receivables	298,323
R0380	Receivables (trade, not insurance)	478,074
R0390	Own shares (held directly)	0
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	814,621
R0420	Any other assets, not elsewhere shown	0
R0500	<b>Total assets</b>	<b>16,244,497</b>

## S.02.01.02

## Balance sheet

		Solvency II value
		C0010
<b>Liabilities</b>		
R0510	Technical provisions - non-life	11,447,303
R0520	<i>Technical provisions - non-life (excluding health)</i>	11,128,491
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	10,580,312
R0550	<i>Risk margin</i>	548,179
R0560	<i>Technical provisions - health (similar to non-life)</i>	318,812
R0570	<i>TP calculated as a whole</i>	0
R0580	<i>Best Estimate</i>	292,903
R0590	<i>Risk margin</i>	25,909
R0600	Technical provisions - life (excluding index-linked and unit-linked)	477,568
R0610	<i>Technical provisions - health (similar to life)</i>	-6,977
R0620	<i>TP calculated as a whole</i>	0
R0630	<i>Best Estimate</i>	-45,439
R0640	<i>Risk margin</i>	38,462
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	484,545
R0660	<i>TP calculated as a whole</i>	0
R0670	<i>Best Estimate</i>	425,242
R0680	<i>Risk margin</i>	59,303
R0690	Technical provisions - index-linked and unit-linked	
R0700	<i>TP calculated as a whole</i>	0
R0710	<i>Best Estimate</i>	0
R0720	<i>Risk margin</i>	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	75,849
R0760	Pension benefit obligations	115,638
R0770	Deposits from reinsurers	58,971
R0780	Deferred tax liabilities	68,490
R0790	Derivatives	0
R0800	Debts owed to credit institutions	8
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	5,592
R0830	Reinsurance payables	92,856
R0840	Payables (trade, not insurance)	458,698
R0850	Subordinated liabilities	300,000
R0860	<i>Subordinated liabilities not in BOF</i>	0
R0870	<i>Subordinated liabilities in BOF</i>	300,000
R0880	Any other liabilities, not elsewhere shown	0
R0900	<b>Total liabilities</b>	<b>13,100,973</b>
R1000	<b>Excess of assets over liabilities</b>	<b>3,143,523</b>













S.25.02.22

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

	Unique number of component	Component description	Calculation of the Solvency Capital Requirement
Row	C0010	C0020	C0030
1	1	Group SCR	2,783,641

## S.25.02.22

**Solvency Capital Requirement - for groups using the standard formula and partial internal model****Calculation of Solvency Capital Requirement**

C0100

R0110	Total undiversified components	2,783,641
R0060	Diversification	
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	
R0200	<b>Solvency capital requirement excluding capital add-on</b>	2,783,641
R0210	Capital add-ons already set	
R0220	<b>Solvency capital requirement for undertakings under consolidated method</b>	2,783,641

**Other information on SCR**

R0300	Amount/estimate of the overall loss-absorbing capacity of technical provisions	
R0310	Amount/estimate of the overall loss-absorbing capacity of deferred taxes	
R0400	Capital requirement for duration-based equity risk sub-module	
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	
R0420	Total amount of Notional Solvency Capital Requirement for ring fenced funds	
R0430	Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	
R0440	Diversification effects due to RFF nSCR aggregation for article 304	
R0470	Minimum consolidated group solvency capital requirement	1,320,097

**Information on other entities**

R0500	Capital requirement for other financial sectors (Non-insurance capital requirements)	
R0510	<i>Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies</i>	
R0520	<i>Institutions for occupational retirement provisions</i>	
R0530	<i>Capital requirement for non-regulated entities carrying out financial activities</i>	
R0540	Capital requirement for non-controlled participation requirements	
R0550	Capital requirement for residual undertakings	

**Overall SCR**

R0560	SCR for undertakings included via D and A	
R0570	<b>Solvency capital requirement</b>	2,783,641

S.32.01.22

Undertakings in the scope of the group

	Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority
Row	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080
1	IL	213800YIPBN5ZRM6	LEI	AIG Israel	Composite undertaking	Company limited by shares	Non-mutual	Supervisor of Insurance (Israel)
2	GB	21380087VX2V5QO	LEI	American International Group UK Limited	Non life insurance undertaking	Company limited by shares	Non-mutual	
3	GB	213800UHT55BFWF	LEI	AIG Trade Finance	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	
4	GB	XWPHK4S1M3QRJ1	LEI	AIG Europe Limited	Composite undertaking	Company limited by shares	Non-mutual	Prudential Regulation Authority
5	DE	213800VBMGDOCR4	LEI	Hansa Grundstückverwaltungs GmbH & Co KG	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	
6	GB	2138009M8A3W8LN	LEI	AIG Receivables Management Limited	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	
7	DE	213800QSEAOAJ3C	LEI	Hansa GmbH	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	
8	GB	213800OX9RASDO6	LEI	AIG Medical Management Services UK Limited	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	
9	IT	213800Q2FDYYBZD	LEI	AIG Advisors S.R.L	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	
10	DE	213800CE35MC32B	LEI	Wynona 1837 GmbH	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	
11	DE	213800MB7KXDDAR	LEI	AIG Germany Holdings GmbH	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	
12	IE	213800M34RBQ4MV	LEI	Laya Healthcare Limited	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	
13	BE	2138003C7C74UEA	LEI	AIG Global Reinsurance Operations	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	
14	GB	XWPHK4S1M3QRJ1	Specific code	CI Group	Other	Company limited by shares	Non-mutual	
15	GB	213800QOW312BVT	LEI	AIG Life Limited	Life insurance undertaking	Company limited by shares	Non-mutual	Prudential Regulation Authority
16	GB	2138009EFBD5FYG	LEI	AIG Holdings Europe Limited		Company limited by shares	Non-mutual	
17	JE	2138002A16KNCV1	LEI	Avondhu Limited	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	
18	GB	213800NUVVGDIYY	LEI	AIG Europe Services Limited	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual	

S.32.01.22

Undertakings in the scope of the group

			Criteria of influence						Inclusion in the scope of Group supervision		Group solvency calculation	
Country	Identification code of the undertaking	Type of code of the ID of the undertaking	% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	YES/NO	Date of decision if art. 214 is applied	Method used and under method 1, treatment of the undertaking	
Row	C0010	C0020	C0030	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
1	IL	213800YIPBN5ZRM6	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
2	GB	21380087VX2V5QO	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
3	GB	213800UHTS5BFWF	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
4	GB	XWPHK4S1M3QRJ1	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
5	DE	213800VBMGDOCR4	LEI	94.50%	100.00%	94.50%		Dominant	94.50%	Included in the scope		Method 1: Proportional consolidation
6	GB	2138009M8A3W8LN	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
7	DE	213800QSEAOAJ3C	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
8	GB	213800QX9RASDO6	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
9	IT	213800O2FDYYBZD	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
10	DE	213800CE35MC328	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
11	DE	213800MB7KXDDAR	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
12	IE	213800M34RBQ4MV	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
13	BE	2138003C7C74UEA	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
14	GB	XWPHK4S1M3QRJ1	Specific code	20.00%	20.00%	20.00%			20.00%	Included in the scope		Method 1: Adjusted equity method
15	GB	213800QOW312BVT	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
16	GB	2138009EFBD5FYG	LEI	100.00%	100.00%	100.00%				Included in the scope		Method 1: Full consolidation
17	JE	2138002A16KNCV15	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
18	GB	213800NUVVG1YY	LEI	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation

# AIG EUROPE LIMITED

## Solvency and Financial Condition Report

### Disclosures

30 November

**2018**

(Monetary amounts in GBP thousands)

**General information**

Undertaking name	AIG EUROPE LIMITED
Undertaking identification code	XWPHK4S1M3QRJ1MIR482
Type of code of undertaking	LEI
Type of undertaking	Undertakings pursuing both life and non-life insurance activity - article 73 (2)
Country of authorisation	GB
Language of reporting	en
Reporting reference date	30 November 2018
Currency used for reporting	GBP
Accounting standards	IFRS
Method of Calculation of the SCR	Full internal model
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

**List of reported templates**

- S.02.01.02 - Balance sheet
- S.05.01.02 - Premiums, claims and expenses by line of business
- S.05.01.02 - Premiums, claims and expenses by line of business
- S.05.02.01 - Premiums, claims and expenses by country
- S.05.02.01 - Premiums, claims and expenses by country
- S.12.01.02 - Life and Health SLT Technical Provisions
- S.17.01.02 - Non-Life Technical Provisions
- S.19.01.21 - Non-Life insurance claims
- S.19.01.21 - Non-Life insurance claims
- S.23.01.01 - Own Funds
- S.25.03.21 - Solvency Capital Requirement - for undertakings on Full Internal Models
- S.25.03.21 - Solvency Capital Requirement - for undertakings on Full Internal Models
- S.28.02.01 - Minimum Capital Requirement - Both life and non-life insurance activity

## S.02.01.02

## Balance sheet

Solvency II value	
C0010	
	0
	116,546
	33,899
	131,335
	9,929,296
	0
	202,531
	4,806
	0
	4,806
	9,718,224
	3,362,357
	6,355,867
	0
	0
	3,733
	1
	0
	0
	0
	393,437
	0
	0
	393,437
	2,699,907
	2,692,087
	2,689,811
	2,276
	7,820
	0
	7,820
	0
	0
	32,929
	296,193
	415,796
	0
	0
	647,798
	0
	14,697,135

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

## S.02.01.02

## Balance sheet

		Solvency II value
		C0010
<b>Liabilities</b>		
R0510	Technical provisions - non-life	11,153,644
R0520	<i>Technical provisions - non-life (excluding health)</i>	10,844,319
R0530	<i>TP calculated as a whole</i>	0
R0540	<i>Best Estimate</i>	10,315,201
R0550	<i>Risk margin</i>	529,118
R0560	<i>Technical provisions - health (similar to non-life)</i>	309,325
R0570	<i>TP calculated as a whole</i>	0
R0580	<i>Best Estimate</i>	285,574
R0590	<i>Risk margin</i>	23,751
R0600	Technical provisions - life (excluding index-linked and unit-linked)	68,029
R0610	<i>Technical provisions - health (similar to life)</i>	
R0620	<i>TP calculated as a whole</i>	0
R0630	<i>Best Estimate</i>	0
R0640	<i>Risk margin</i>	0
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	68,029
R0660	<i>TP calculated as a whole</i>	0
R0670	<i>Best Estimate</i>	64,392
R0680	<i>Risk margin</i>	3,637
R0690	Technical provisions - index-linked and unit-linked	
R0700	<i>TP calculated as a whole</i>	0
R0710	<i>Best Estimate</i>	0
R0720	<i>Risk margin</i>	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	75,849
R0760	Pension benefit obligations	60,546
R0770	Deposits from reinsurers	4,902
R0780	Deferred tax liabilities	32,566
R0790	Derivatives	0
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	0
R0830	Reinsurance payables	0
R0840	Payables (trade, not insurance)	337,400
R0850	Subordinated liabilities	
R0860	<i>Subordinated liabilities not in BOF</i>	0
R0870	<i>Subordinated liabilities in BOF</i>	0
R0880	Any other liabilities, not elsewhere shown	0
R0900	<b>Total liabilities</b>	11,732,936
R1000	<b>Excess of assets over liabilities</b>	2,964,200







S.05.02.01

Premiums, claims and expenses by country

Life

	C0150	C0160	C0170	C0180	C0190	C0200	C0210
	Home Country	Top 5 countries (by amount of gross premiums written) - life obligations			Top 5 countries (by amount of gross premiums written) - life obligations		Total Top 5 and home country
R1400	C0220	C0230	C0240	C0250	C0260	C0270	C0280
<b>Premiums written</b>							
R1410 Gross							
R1420 Reinsurers' share							
R1500 Net							
<b>Premiums earned</b>							
R1510 Gross							
R1520 Reinsurers' share							
R1600 Net							
<b>Claims incurred</b>							
R1610 Gross	1,508						1,508
R1620 Reinsurers' share	233						233
R1700 Net	1,276						1,276
<b>Changes in other technical provisions</b>							
R1710 Gross							
R1720 Reinsurers' share							
R1800 Net							
R1900 Expenses incurred							
R2500 Other expenses							
R2600 Total expenses							

S.12.01.02

Life and Health SLT Technical Provisions

	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, including Unit-Linked)	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)	
	Insurance with profit participation	Contracts without options and guarantees	Contracts with options or guarantees	Contracts without options and guarantees	Contracts with options or guarantees	Contracts without options and guarantees				Contracts with options or guarantees	Contracts with options or guarantees					
	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
<b>R0010</b> Technical provisions calculated as a whole																
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole																
<b>R0020</b>																
<b>Technical provisions calculated as a sum of BE and RM</b>																
<b>Best estimate</b>																
<b>R0030</b> Gross Best Estimate								64,392		64,392						
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default								7,820		7,820						
<b>R0080</b>																
Best estimate minus recoverables from reinsurance/SPV and Finite Re								56,572		56,572						
<b>R0090</b>																
<b>R0100</b> Risk margin								3,637		3,637						
<b>Amount of the transitional on Technical Provisions</b>																
<b>R0110</b> Technical Provisions calculated as a whole								0		0						
<b>R0120</b> Best estimate						0	0	0		0						
<b>R0130</b> Risk margin								0		0						
<b>R0200</b> Technical provisions - total								68,029		68,029						

S.17.01.02

Non-Life Technical Provisions

Direct business and accepted proportional reinsurance													Accepted non-proportional reinsurance				Total Non-Life obligation
Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance		
C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180	
<b>R0010 Technical provisions calculated as a whole</b>																	
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole																	
R0050	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Technical provisions calculated as a sum of BE and RM</b>																	
<b>Best estimate</b>																	
<b>Premium provisions</b>																	
R0060	Gross	-15,859	-40,164	338	101,975	4,958	35,831	181,937	132,684	7,750	-4,089	3,019	5,451	631	3,968	418,430	
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	-1,097	-9,945	0	93,156	-27	-21,045	-36,583	-29,219	-4,246	0	-272	-12,848	-72	-6	-250	-22,455
R0150	<b>Net Best Estimate of Premium Provisions</b>	-14,762	-30,218	338	8,819	4,985	56,876	218,520	161,903	11,997	-3,818	15,867	5,524	637	4,218	440,885	
<b>Claims provisions</b>																	
R0160	Gross	34,654	250,605	55,999	816,354	71,358	730,058	1,828,355	5,944,353	98,526	9,571	246,013	33,757	10,304	52,439	10,182,345	
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	1,161	11,302	855	369,075	1,862	236,150	895,065	1,091,203	33,653	0	144	70,192	1,120	43	2,717	2,714,542
R0250	<b>Net Best Estimate of Claims Provisions</b>	33,493	239,303	55,144	447,279	69,496	493,907	933,289	4,853,150	64,873	9,427	175,821	32,637	10,261	49,722	7,467,803	
R0260	<b>Total best estimate - gross</b>	18,795	210,442	56,337	918,329	76,316	765,888	2,010,291	6,077,037	106,276	5,481	249,032	39,208	10,935	56,407	10,600,775	
R0270	<b>Total best estimate - net</b>	18,731	209,085	55,482	456,098	74,481	550,783	1,151,810	5,015,053	76,870	5,609	191,688	38,160	10,898	53,940	7,908,688	
R0280	<b>Risk margin</b>	2,101	17,949	3,700	32,168	5,409	38,315	79,256	347,371	5,268	0	744	13,240	2,534	853	3,960	552,868
<b>Amount of the transitional on Technical Provisions</b>																	
R0290	Technical Provisions calculated as a whole	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
R0300	Best estimate	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
R0310	Risk margin	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
R0320	<b>Technical provisions - total</b>	20,896	228,391	60,037	950,497	81,725	804,204	2,089,548	6,424,407	111,545	6,225	262,272	41,742	11,788	60,367	11,153,644	
R0330	Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	64	1,357	855	462,231	1,835	215,105	858,482	1,061,984	29,406	-128	57,344	1,048	37	2,467	2,692,087	
R0340	<b>Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total</b>	20,832	227,034	59,182	488,265	79,890	589,099	1,231,066	5,362,424	82,138	6,353	204,928	40,694	11,751	57,900	8,461,557	

S.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020 Accident year / underwriting year

Gross Claims Paid (non-cumulative)													
(absolute amount)													
Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180
	Development year										In Current year	Sum of years (cumulative)	
	0	1	2	3	4	5	6	7	8	9	10 & +		
R0100	Prior										90,712	90,712	90,712
R0160	2009	672,706	831,112	511,870	373,995	183,740	160,156	308,634	102,172	56,535	46,472	46,472	3,247,392
R0170	2010	749,498	1,041,739	470,292	237,394	180,373	116,490	59,068	48,212	21,072		21,072	2,924,137
R0180	2011	752,360	939,971	355,332	281,842	141,848	110,696	95,896	60,053			60,053	2,737,998
R0190	2012	578,074	716,464	323,356	238,410	172,630	101,085	153,963				153,963	2,283,982
R0200	2013	645,689	779,197	338,171	204,473	141,633	107,577					107,577	2,216,740
R0210	2014	539,890	847,710	397,111	166,908	110,588						110,588	2,062,208
R0220	2015	621,998	787,323	409,412	209,161							209,161	2,027,895
R0230	2016	815,399	1,176,553	469,850								469,850	2,461,803
R0240	2017	639,623	856,534									856,534	1,496,157
R0250	2018	747,896										747,896	747,896
R0260												2,873,877	22,296,920

Gross Undiscounted Best Estimate Claims Provisions													
(absolute amount)													
Year	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	
	Development year										Year end (discounted data)		
	0	1	2	3	4	5	6	7	8	9	10 & +		
R0100	Prior										925,176	886,247	
R0160	2009	0	0	0	0	0	0	406,080	363,558	449,557		429,493	
R0170	2010	0	0	0	0	0	287,895	272,881	378,798			362,207	
R0180	2011	0	0	0	0	557,712	333,973	431,784				413,537	
R0190	2012	0	0	0	0	526,480	406,990	610,441				583,541	
R0200	2013	0	0	0	642,372	496,731	456,632					436,997	
R0210	2014	0	0	943,259	719,773	625,021						599,019	
R0220	2015	0	1,703,716	1,149,515	891,354							857,392	
R0230	2016	3,029,788	1,792,247	1,455,494								1,400,713	
R0240	2017	3,161,864	1,976,469									1,917,966	
R0250	2018	2,349,380										2,295,233	
R0260												10,182,345	

S.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020 Accident year / underwriting year

Gross Claims Paid (non-cumulative)														
(absolute amount)														
Year	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0170	C0180	
	Development year										In Current year	Sum of years (cumulative)		
	0	1	2	3	4	5	6	7	8	9	10 & +			
R0100	Prior											0	0	
R0160	2009	0	0	0	0	0	0	0	0	0	0	0	0	
R0170	2010	0	0	0	0	0	0	0	0	0		0	0	
R0180	2011	0	0	0	0	0	0	0				0	0	
R0190	2012	0	0	0	0	0	0					0	0	
R0200	2013	0	0	0	0	0						0	0	
R0210	2014	0	0	0	0							0	0	
R0220	2015	0	0	0	0							0	0	
R0230	2016	0	0	0								0	0	
R0240	2017	0	0									0	0	
R0250	2018	0										0	0	
R0260												Total	0	0

Gross Undiscounted Best Estimate Claims Provisions													
(absolute amount)													
Year	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0360	
	Development year										Year end (discounted data)		
	0	1	2	3	4	5	6	7	8	9	10 & +		
R0100	Prior											0	
R0160	2009	0	0	0	0	0	0	0	0	0	0	0	
R0170	2010	0	0	0	0	0	0	0	0	0		0	
R0180	2011	0	0	0	0	0	0	0				0	
R0190	2012	0	0	0	0	0	0					0	
R0200	2013	0	0	0	0	0						0	
R0210	2014	0	0	0	0							0	
R0220	2015	0	0	0	0							0	
R0230	2016	0	0	0								0	
R0240	2017	0	0									0	
R0250	2018	0										0	
R0260												Total	0

S.23.01.01  
Own Funds

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

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

Ancillary own funds

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

Available and eligible own funds

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

R0580	SCR
R0600	MCR
R0620	Ratio of Eligible own funds to SCR
R0640	Ratio of Eligible own funds to MCR

Reconciliation reserve

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

Expected profits

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

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
199,296	199,296		0	
0	0		0	
	0		0	
		0	0	0
	0			
		0	0	0
		0	0	0
2,680,923	2,680,923			
0		0	0	0
83,981				83,981
	0	0	0	0
0				
2,964,200	2,880,219		0	83,981
300,000			300,000	
300,000			300,000	
3,264,200	2,880,219		300,000	83,981
2,880,219	2,880,219		0	
3,264,200	2,880,219		300,000	83,981
2,880,219	2,880,219		0	
2,523,557				
1,135,601				
129.35%				
253.63%				
C0060				
2,964,200				
0				
283,277				
0				
2,680,923				
271,236				
271,236				

S.25.03.21

## Solvency Capital Requirement - for undertakings on Full Internal Models

	Unique number of component	Component description	Calculation of the Solvency Capital Requirement
	C0010	C0020	C0030
1	10300I	Market Risk	140,182
2	10400I	Market Risk	53,812
3	10900I	Market Risk	489,439
4	10700I	Market Risk	546,551
5	11000I	Market Risk	155,819
6	10600I	Market Risk	28,591
7	19900I	Market Risk	-736,763
8	20100I	Credit Risk	194,317
9	20200I	Credit Risk	114,173
10	29900I	Credit Risk	-94,111
11	50100I	Insurance Risk	689,245
12	50200I	Insurance Risk	1,304,498
13	50301I	Insurance Risk	776,727
14	50302I	Insurance Risk	620,115
15	59900I	Insurance Risk	-1,426,906
16	70100I	Operational	281,326
17	80100P	Pension Risk	68,926
18	80300I	Deferred Tax Benefit	-16,587
19	80400I	Other adjustments	119,816

## S.25.03.21

## Solvency Capital Requirement - for undertakings on Full Internal Models

Calculation of Solvency Capital Requirement		C0100
R0110	Total undiversified components	3,309,169
R0060	Diversification	-785,612
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	
R0200	<b>Solvency capital requirement excluding capital add-on</b>	2,523,557
R0210	Capital add-ons already set	
R0220	<b>Solvency capital requirement</b>	2,523,557
<b>Other information on SCR</b>		
R0300	Amount/estimate of the overall loss-absorbing capacity of technical provisions	
R0310	Amount/estimate of the overall loss-absorbing capacity of deferred taxes	16,587
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	
R0420	Total amount of Notional Solvency Capital Requirement for ring fenced funds	
R0430	Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	
R0440	Diversification effects due to RFF nSCR aggregation for article 304	

S.28.02.01

Minimum Capital Requirement - Both life and non-life insurance activity

	Non-life activities	Life activities	Non-life activities	Life activities
	MCR <sub>(NL,NL)</sub> Result	MCR <sub>(NL,L)</sub> Result		
	C0010	C0020		
R0010 Linear formula component for non-life insurance and reinsurance obligations	1,239,988			
	Net (of reinsurance/S PV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months	Net (of reinsurance/S PV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
	C0030	C0040	C0050	C0060
R0020 Medical expense insurance and proportional reinsurance	18,731	67,197		
R0030 Income protection insurance and proportional reinsurance	209,085	333,057		
R0040 Workers' compensation insurance and proportional reinsurance	55,482	583		
R0050 Motor vehicle liability insurance and proportional reinsurance	456,098	327,783		
R0060 Other motor insurance and proportional reinsurance	74,481	36,692		
R0070 Marine, aviation and transport insurance and proportional reinsurance	550,783	357,046		
R0080 Fire and other damage to property insurance and proportional reinsurance	1,151,810	956,425		
R0090 General liability insurance and proportional reinsurance	5,015,053	1,420,818		
R0100 Credit and suretyship insurance and proportional reinsurance	76,870	49,083		
R0110 Legal expenses insurance and proportional reinsurance				
R0120 Assistance and proportional reinsurance	5,609	33,331		
R0130 Miscellaneous financial loss insurance and proportional reinsurance	191,688	94,188		
R0140 Non-proportional health reinsurance				
R0150 Non-proportional casualty reinsurance	38,160	56,531		
R0160 Non-proportional marine, aviation and transport reinsurance	10,898	8,897		
R0170 Non-proportional property reinsurance	53,940	45,406		
	MCR <sub>(L,NL)</sub> Result	MCR <sub>(L,L)</sub> Result		
	C0070	C0080		
R2020 Linear formula component for life insurance and reinsurance obligations		1,264		
	Net (of reinsurance/S PV) best estimate and TP calculated as a whole	Net (of reinsurance/S PV) total capital at risk	Net (of reinsurance/S PV) best estimate and TP calculated as a whole	Net (of reinsurance/S PV) total capital at risk
	C0090	C0100	C0110	C0120
R2021 Obligations with profit participation - guaranteed benefits				
R2022 Obligations with profit participation - future discretionary benefits				
R2023 Index-linked and unit-linked insurance obligations			0	
R2024 Other life (re)insurance and health (re)insurance obligations			60,209	
R2025 Total capital at risk for all life (re)insurance obligations				
<b>Overall MCR calculation</b>	C0130			
R0300 Linear MCR	1,241,252			
R0310 SCR	2,523,557			
R0320 MCR cap	1,135,601			
R0330 MCR floor	630,889			
R0340 Combined MCR	1,135,601			
R0350 Absolute floor of the MCR	3,288			
R0400 <b>Minimum Capital Requirement</b>	1,135,601			
<b>Notional non-life and life MCR calculation</b>	C0140	C0150		
R0500 Notional linear MCR	1,239,988	1,264		
R0510 Notional SCR excluding add-on (annual or latest calculation)	2,520,987	2,571		
R0520 Notional MCR cap	1,134,444	1,157		
R0530 Notional MCR floor	630,247	643		
R0540 Notional combined MCR	1,134,444	1,157		
R0550 Absolute floor of the notional MCR	3,288	3,288		
R0560 <b>Notional MCR</b>	1,134,444	1,157		

# American International Group UK Limited

## Solvency and Financial Condition Report

### Disclosures

30 November

**2018**

(Monetary amounts in GBP thousands)

**General information**

Undertaking name	American International Group UK Limited
Undertaking identification code	21380087VX2V5Q023G83
Type of code of undertaking	LEI
Type of undertaking	Non-life undertakings
Country of authorisation	GB
Language of reporting	en
Reporting reference date	30 November 2018
Currency used for reporting	GBP
Accounting standards	Local GAAP
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

**List of reported templates**

- S.02.01.02 - Balance sheet
- S.05.01.02 - Premiums, claims and expenses by line of business
- S.05.02.01 - Premiums, claims and expenses by country
- S.23.01.01 - Own Funds
- S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula
- S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

## S.02.01.02

## Balance sheet

		Solvency II value
		C0010
<b>Assets</b>		
R0030	Intangible assets	
R0040	Deferred tax assets	
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	0
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	0
R0080	<i>Property (other than for own use)</i>	0
R0090	<i>Holdings in related undertakings, including participations</i>	0
R0100	<i>Equities</i>	0
R0110	<i>Equities - listed</i>	
R0120	<i>Equities - unlisted</i>	
R0130	<i>Bonds</i>	0
R0140	<i>Government Bonds</i>	0
R0150	<i>Corporate Bonds</i>	0
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	0
R0180	<i>Collective Investments Undertakings</i>	0
R0190	<i>Derivatives</i>	
R0200	<i>Deposits other than cash equivalents</i>	0
R0210	<i>Other investments</i>	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	0
R0240	<i>Loans on policies</i>	0
R0250	<i>Loans and mortgages to individuals</i>	
R0260	<i>Other loans and mortgages</i>	
R0270	Reinsurance recoverables from:	0
R0280	<i>Non-life and health similar to non-life</i>	0
R0290	<i>Non-life excluding health</i>	
R0300	<i>Health similar to non-life</i>	
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	0
R0320	<i>Health similar to life</i>	
R0330	<i>Life excluding health and index-linked and unit-linked</i>	
R0340	<i>Life index-linked and unit-linked</i>	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	
R0370	Reinsurance receivables	
R0380	Receivables (trade, not insurance)	4
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	3,700
R0420	Any other assets, not elsewhere shown	
R0500	<b>Total assets</b>	<b>3,704</b>

## S.02.01.02

## Balance sheet

		Solvency II value
		C0010
<b>Liabilities</b>		
R0510	Technical provisions - non-life	0
R0520	<i>Technical provisions - non-life (excluding health)</i>	0
R0530	<i>TP calculated as a whole</i>	
R0540	<i>Best Estimate</i>	
R0550	<i>Risk margin</i>	
R0560	<i>Technical provisions - health (similar to non-life)</i>	0
R0570	<i>TP calculated as a whole</i>	
R0580	<i>Best Estimate</i>	
R0590	<i>Risk margin</i>	
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	<i>Technical provisions - health (similar to life)</i>	0
R0620	<i>TP calculated as a whole</i>	
R0630	<i>Best Estimate</i>	
R0640	<i>Risk margin</i>	
R0650	<i>Technical provisions - life (excluding health and index-linked and unit-linked)</i>	0
R0660	<i>TP calculated as a whole</i>	
R0670	<i>Best Estimate</i>	
R0680	<i>Risk margin</i>	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	<i>TP calculated as a whole</i>	
R0710	<i>Best Estimate</i>	
R0720	<i>Risk margin</i>	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	
R0790	Derivatives	
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	
R0830	Reinsurance payables	
R0840	Payables (trade, not insurance)	23
R0850	Subordinated liabilities	0
R0860	<i>Subordinated liabilities not in BOF</i>	
R0870	<i>Subordinated liabilities in BOF</i>	
R0880	Any other liabilities, not elsewhere shown	
R0900	<b>Total liabilities</b>	<b>23</b>
R1000	<b>Excess of assets over liabilities</b>	<b>3,680</b>

S.05.01.02

Premiums, claims and expenses by line of business

Non-life

Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)												Line of business for: accepted non-proportional reinsurance				Total
Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Misc. financial loss	Health	Casualty	Marine, aviation and transport	Property	
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
<b>Premiums written</b>																
R0110	Gross - Direct Business															0
R0120	Gross - Proportional reinsurance accepted															0
R0130	Gross - Non-proportional reinsurance accepted															0
R0140	Reinsurers' share															0
R0200	Net															0
<b>Premiums earned</b>																
R0210	Gross - Direct Business															0
R0220	Gross - Proportional reinsurance accepted															0
R0230	Gross - Non-proportional reinsurance accepted															0
R0240	Reinsurers' share															0
R0300	Net															0
<b>Claims incurred</b>																
R0310	Gross - Direct Business															0
R0320	Gross - Proportional reinsurance accepted															0
R0330	Gross - Non-proportional reinsurance accepted															0
R0340	Reinsurers' share															0
R0400	Net															0
<b>Changes in other technical provisions</b>																
R0410	Gross - Direct Business															0
R0420	Gross - Proportional reinsurance accepted															0
R0430	Gross - Non-proportional reinsurance accepted															0
R0440	Reinsurers' share															0
R0500	Net															0
R0550	<b>Expenses incurred</b>															0
R1200	<b>Other expenses</b>															20
R1300	<b>Total expenses</b>															20



S.23.01.01

**Own Funds**

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

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

**Ancillary own funds**

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

**Available and eligible own funds**

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

**R0580 SCR**

**R0600 MCR**

**R0620 Ratio of Eligible own funds to SCR**

**R0640 Ratio of Eligible own funds to MCR**

**Reconciliation reserve**

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

**Expected profits**

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

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
37	37		0	
3,663	3,663		0	
0	0		0	
0		0	0	0
0	0			
0		0	0	0
0		0	0	0
-20	-20			
0		0	0	0
0				0
0	0	0	0	0
0				
0				
0				
0				
0				
0			0	0
3,680	3,680	0	0	0
0				
0				
0				
0				
0				
0				
0				
0				
0				
0			0	0
3,680	3,680	0	0	0
3,680	3,680	0	0	
3,680	3,680	0	0	0
3,680	3,680	0	0	
543				
3,288				
677.65%				
111.92%				
C0060				
3,680				
0				
3,700				
0				
-20				
0				



S.28.01.01

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

Linear formula component for non-life insurance and reinsurance obligations

C0010

R0010	MCR <sub>NL</sub> Result	0
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Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
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C0020

C0030

	C0020	C0030
R0020		
R0030		
R0040		
R0050		
R0060		
R0070		
R0080		
R0090		
R0100		
R0110		
R0120		
R0130		
R0140		
R0150		
R0160		
R0170		

Linear formula component for life insurance and reinsurance obligations

C0040

R0200	MCR <sub>L</sub> Result	0
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Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
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C0050

C0060

	C0050	C0060
R0210		
R0220		
R0230		
R0240		
R0250		

Overall MCR calculation

C0070

R0300	Linear MCR	0
R0310	SCR	543
R0320	MCR cap	244
R0330	MCR floor	136
R0340	Combined MCR	136
R0350	Absolute floor of the MCR	3,288
R0400	<b>Minimum Capital Requirement</b>	<b>3,288</b>