



**AIG Holdings Europe Limited**  
**Solvency and Financial Condition Report 2022**

**CONTENTS**

**Summary.....4**

**AIG Holdings Europe Limited Directors’ Report.....6**

**American International Group UK Limited Directors’ Report .....8**

**Independent Auditors’ Report .....9**

**A. Business and Performance.....13**

A.1 Business .....14

A.2 Underwriting Performance – AHEL .....18

A.3 Investment Performance .....20

A.4 Performance from Other Activities .....22

A.5 Any Other Material Information .....22

**B. System of Governance .....23**

B.1 General Information on the System of Governance .....24

B.2 Fit and Proper .....32

B.3 Risk Management System .....32

B.4 Internal Control System .....37

B.5 Internal Audit Function .....37

B.6 Actuarial Function .....37

B.7 Outsourcing Arrangements.....37

B.8 Any other Material Information.....38

**C. Risk Profile .....39**

C.1 Insurance Risk (Underwriting Risk) .....42

C.2 Market Risk .....45

C.3 Credit Risk .....49

C.4 Liquidity Risk .....51

C.5 Operational Risk.....53

C.6 Other Material Risks .....57

**D. Valuation for Solvency Purposes .....60**

D.1 Assets .....65

D.2 Technical Provisions.....70

D.3 Other Liabilities .....75

D.4 Alternative Valuation Methods.....76

D.5 Any Other Material Information .....77

**E. Capital Management.....79**

E.1 Own Funds .....81

E.2 Group Solvency Capital Requirement and Minimum Capital Requirement .....81

E.3 Use of Duration-based Equity Risk Sub-Module in the Calculation of the SCR.....86

E.4 Differences between the Standard Formula and any Internal Model used.....86

E.5 Non-Compliance with SCR and MCR .....90

E.6	Any Other Information.....	90
<b>F.</b>	<b>Appendices to the Solvency and Financial Condition Report .....</b>	<b>91</b>

# Summary

## 2022 Solvency and Financial Condition

This document sets out the Solvency and Financial Condition Report for AHEL in accordance with Solvency II Regulations. The group SFCR includes the Solo Solvency and Financial Condition information for American International Group UK Limited (AIG UK) which are shown side-by-side. AIG UK contributes circa 90% of the group Solvency Capital Requirement (SCR).

This group SFCR also includes information on AIG Israel Insurance Company Limited (AIG Israel) which is a non-EEA insurance subsidiary based in Israel and is not subject to Solvency II Regulations.

## Business and Performance

The principal activity of AHEL is to act as a holding company of AIG UK and AIG Israel. AHEL is a UK registered and domiciled company. AIG UK is the legal entity for AIG's UK General Insurance activities. AIG has a history of over 60 years in the UK, where we are one of the largest companies specialising in the UK business insurance market.

As at 30 November 2022, AHEL held 100% of the ordinary shares in AIG UK and AIG Israel.

The results of AHEL for the year-ended 30 November 2022, as shown in the Financial Statements, show a loss before tax for the period of £0.2m (2021 – profit of £8.4m). As at 30 November 2022, total equity of the Company was £2,349m (2021 - £2,368m).

AIG UK is the largest insurance subsidiary contributing 82% of AHEL's aggregated net written premiums for FY2022. AIG UK's business segments are organised into Commercial and Consumer lines. Commercial lines refer to products and services for the commercial and institutional customers. 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 18% of AHEL's aggregated net written premium for FY2022. 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 UK made a total underwriting profit of £158.5m (2021 – profit of £42.9m).

AHEL as a group in 2022 had total investment losses of £368.9m (2021 return of £82.9). This is made up of:

- £504.5m unrealised losses arising primarily from corporate and government bonds over the year due to increases in market yields between 2021 and 2022;
- £18.4m on realised gains arising primarily from government bonds, mutual funds and loan participations during the year; and
- £117.7m investment income mostly representing the coupons and interests received or accrued over the year from corporate and government bonds.

Section A of this report sets out further details about AHEL and AIG UK's business structure, key operations and financial performance over the reporting period.

## System of Governance

AHEL's business strategy and operations function within its subsidiary's governance structure, of which the management of risk plays a significant part. Governance starts with the Board, which has overall responsibility for oversight of the company and its subsidiaries who operate a framework of prudent and effective controls enabling AHEL's risks to be identified, assessed and managed.

Included in the governance framework is the Risk Management Framework, which supports AHEL, and its subsidiaries' risk culture. The risk framework covers the Company's subsidiaries' businesses; operational functions and risk areas; establishes risk committees; risk reporting and risk controls. The AHEL Risk Management Framework as embedded in its subsidiaries is based on the "Three Lines of Defence" model. This structure allows for each subsidiaries functions and individuals to have a clear understanding of their risk management responsibilities and aids embedding an effective risk culture.

Section B of this report provides further detail about the system of governance, the roles and responsibilities of the Board and the key control functions: Risk Management, Actuarial, Compliance and Internal Audit. The Risk Management Framework explains how it complies with the requirements of Solvency II. It also describes the approach to the Own Risk and Solvency Assessment (ORSA) and governance over AHEL's Partial Internal Model (PIM) and AIG UK's Internal Model, which are used to determine the SCR.

**Risk Profile**

For the purposes of risk identification and measurement AHEL’s key risk types are; Insurance Risk, Market Risk, Credit Risk, Liquidity Risk and Operational Risk (see sections C.1 to C.6). The types of risk to which AHEL is exposed have not changed significantly over the year and remain as those mentioned above.

Risk identification is carried out on a regular basis, embedded in the business planning process, drawing on a combination of internal and external data, covering both normal and stressed conditions. The primary sources for identifying risks include risk event analysis, external and internal trends analysis and management information as well as other risk governance processes and input from executive teams and internal committees.

The SCR and cover ratio are the bases on which Solvency II capital risk appetites and limits are set. These are used to assess the significance of risks and to appropriately direct resources to their management. The primary basis used to measure risks is the SCR which is calculated as Solvency II Own Funds at risk in a 1-in-200 year loss event over a 1-year time horizon.

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 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 SCRs.

AHEL SCR (unaudited)	AHEL	AIG Israel	Group SCR
£’m	Y/E 2022	Y/E 2022	Y/E 2022
Insurance risk	951.6	158.1	1,109.7
Market risk	467.2	43.1	510.3
Credit risk	151.8	23.1	175.0
Operational risk	212.9	11.8	224.7
Pension risk	32.0	-	32.0
Loss Absorbing capacity of deferred taxes	-	(8.9)	(8.9)
Diversification	(523.4)	(84.2)	(607.6)
Total SCR	1,292.2	143.0	1,435.2

A Major Model Change application made in 2021 was approved by the PRA on 31 January 2022. This was for the change in the risk profile following the purchase of an Adverse Development Cover (ADC) reinsurance contract which provides cover against prior year development.

An application for a Major Model Change was submitted to the PRA on 11 November 2022. This is for a change to the Model Change Policy and will have no quantitative impact to AIG. As the approval date for this will be post 30 November 2022, AHEL and AIG UK are bound to report against the reporting view of the SCR prior to the Major Model Change application. As such, the reported SCR does not reflect model changes up to the year-end 2022 which provided further reductions in the SCR.

AIG Israel Standard Formula (SF) calculations are performed at 2022-Q3 for the AHEL YEAR-END 2022 capital calculation as AIG Israel has a 31 December 2022 year-end reporting date.

**Valuation for Solvency Purposes**

The “Valuation for Solvency Purposes” section states the principles and bases applied by AHEL in preparing the Solvency II Economic Balance Sheet (EBS). AHEL’s Solvency II balance sheet has been prepared using the default accounting consolidation method (Method 1).

AHEL’s subsidiaries consist of largely insurance undertakings and service providing entities. Whilst AHEL and the majority of its subsidiaries have a 30 November financial period end, the subsidiary AIG Israel has a non-coterminous period end at 31 December. At 30 November 2022, AHEL has consolidated AIG Israel’s EBS as at year-ended 30 September 2022.

Solvency II requires Technical Provisions to be segmented by Solvency II lines of business. Currently, the PRA 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.

For AHEL the consolidated best estimate of Technical Provisions is calculated as the sum of Solvency II Best Estimates of AIG UK and AIG Israel. AHEL’s Risk Margin is the sum of solo Risk Margins for AIG UK and AIG Israel.

Section D of this report provides further description of the bases, methods and main assumptions used in the valuation of assets, technical provisions and other liabilities for each material asset/liability class.

## Capital Management

AHEL 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. 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 target level; 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 worldwide AIG Group.

Capital Management works alongside Enterprise Risk Management to conduct group internal and regulatory stress and scenario testing. In managing Own Funds, AHEL seeks to maintain sufficient financial strength in accordance with its risk appetite and to satisfy regulatory requirements, maintain strong liquidity and allocate capital efficiently to remain within risk appetite and drive growth.

AHEL'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 AHEL Capital Plan is built. The AHEL Capital Plan is updated and approved by the Board annually or more frequently if there are material changes in circumstances.

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

YE 2022	AIG Holdings Europe Limited	American International Group UK Limited
Eligible Own Funds	£2,289.7m	£2,143.9m
Solvency Capital Requirement	£1,435.2m <sup>1</sup>	£1,269.8m <sup>2</sup>
Surplus	£854.5m	£874.1m
Solvency Ratio	159.5% <sup>1</sup>	168.8% <sup>2</sup>
Minimum Capital Requirement	£720.7m	£502.6m

<sup>1</sup> Partial Internal Model

<sup>2</sup> Internal Model

Since 1 December 2018, both AHEL and AIG UK have been using their PIM / Solo Internal Model (IM) respectively for the calculation of their Group and Solo SCR.

AHEL views its PIM and AIG UK views its Internal Model to be true representations of their risk profiles respectively and continue to monitor their solvency by reference to the Internal Model SCR (IM SCR).

AHEL PIM Solvency Capital Requirement (PIM-SCR) at 30 November 2022 is £1,435.2m. This is covered by £2,289.7m of eligible capital resources, providing a Solvency II surplus of £854.5m and a Solvency II coverage ratio of 159.5%. Both metrics are defined by the regulations to mean the excess of AHEL's total eligible Own Funds over its SCR.

AIG UK's IM-SCR at 30 November 2022 is £1,269.8m. This is covered by £2,143.9m of eligible capital resources, providing Solvency II surplus of £874.1m and Solvency II coverage ratio of 168.8%. Both metrics are defined by the regulations to mean the excess of AIG UK's total eligible Own Funds over its SCR.

The total Available Own Funds for AHEL by tier is summarised below.

	Tier 1 Unrestricted £'m	Tier 1 Restricted £'m	Tier 2 £'m	Tier 3 £'m	Total £'m
Total Available Own Funds 2022	1,460.2	304.3	400.0	125.2	2,289.7
Total Available Own Funds 2021	1,535.9	304.3	400.0	78.1	2,318.3

# AIG Holdings Europe Limited Directors' Report

The Directors are responsible for preparing the AHEL 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.

The listing of Directors as of 30 November 2022 is as follows:

Director	C. Newby
Director	A. Baldwin
Director	F. Brossart
Chair and Independent Non-Executive Director	P. Tromp

During the financial year 2022, the following resignations took place:

P. Willcock                      Resigned 02 March 2022

## 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 AHEL 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

AHEL has complied with all material respects with Solvency II requirements throughout the financial year 2022. AHEL reasonably believes that it will continue to comply with the Solvency II requirements for the foreseeable future.

## Statement of disclosure of information to auditors

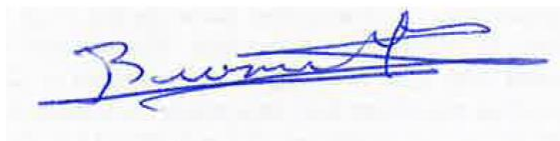
Each of the persons, who are a director in office at the date this report is approved, confirms that:

- 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

AHEL has, by ordinary resolution appointed Mazars LLP as the Company's auditors to hold office until the end of the next period for appointing auditors.

On behalf of the Board,



Fabrice Brossart

Director

# 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.

The listing of Directors as of 30 November 2022 is as follows:

Chair and Independent Non-Executive Director	P. Tromp
Chief Executive Officer	A. Baldwin
Chief Financial Officer	A. Thomas
Non-Executive Director	J. Hancock
Independent Non-Executive Director	P. Shaw
Independent Non-Executive Director	D. Smith
Independent Non-Executive Director	J. Warrack

During the financial year 2022, the following resignations and appointments took place:

R. O'Malley	Resigned 4 February 2022
J. Warrack	appointed 6 April 2022
A. Thomas	appointed 24 August 2022

## 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 2022. 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

AIG UK has, by ordinary resolution, appointed Mazars LLP as the Company's auditors to hold office until the end of the next period for appointing auditors.

On behalf of the Board



Anthony Baldwin

Director



# Independent Auditors' Report

Report of the external independent auditor to the Directors of AIG Holdings Europe Limited ('the Company') pursuant to Rule 4.1 (2) of the External Audit Chapter of the PRA Rulebook applicable to Solvency II firms

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

## Opinion

Except as stated below, we have audited the following documents prepared by **AIG Holdings Europe Limited** as at 30 November 2022:

- 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 2021, ('**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 S02.01.02, S12.01.01, S17.01.02, S23.01.01, S28.02.01 in respect of American International Group UK Limited ('the group member') ('**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, 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 S05.01.02, S05.02.01, S19.01.21 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 Statement of Director' Responsibilities**').

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 2022 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based, as modified by relevant supervisory modifications, and as supplemented by supervisory approvals and determinations.

## Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)), including ISA (UK) 800 and ISA (UK) 805, and applicable law. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the relevant elements of the 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.

## 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 PRA. 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.

## Conclusions relating to going concern

In auditing the Single Group- Wide Solvency and Financial Condition Report, we have concluded that the Directors' use of the going concern basis of accounting in the preparation of the Single Group- Wide Solvency and Financial Condition Report is appropriate.

Our audit procedures to evaluate the Directors' assessment of the Company's ability to continue to adopt the going concern basis of accounting in the preparation of the Single Group-Wide Solvency and Financial Condition Report included but were not limited to:

- Undertaking an initial assessment at the planning stage of the audit to identify events or conditions that may cast significant doubt on the company's ability to continue as a going concern;
- Obtaining an understanding of the process relating to the directors' going concern assessment;

- Making enquiries of the directors to understand the period of assessment considered by them, the assumptions they considered and the implication of those when assessing the company's future financial performance
- Challenging the appropriateness of the directors' key assumptions in their future performance forecasts, by reviewing supporting and contradictory evidence in relation to these key assumptions and assessing the directors' consideration of severe but plausible scenarios;
- Testing the accuracy and functionality of the model used to prepare the directors' forecasts.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of at least twelve months from when the Single Group-Wide Solvency and Financial Condition Report is authorised for issue.

Our responsibilities and the responsibilities of the Directors with respect to going concern are described in the relevant sections of this report.

#### **Other Information**

The Directors of the Company 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 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 and determinations made by the PRA under section 138A of FSMA, the PRA Rules and Solvency II regulations on which they are based, as detailed below:

##### ***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 method
- Approval to classify certain equity accounted convertible notes as restricted tier-1 capital

The Directors are also responsible for:

- such internal control as management determines 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;
- overseeing the Company's financial reporting process; and,
- assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and using the going concern basis of accounting unless they either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

#### **Auditor's 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 relevant elements of the Single Group-Wide Solvency and Financial Condition Report are prepared, in all material respects, with financial reporting provisions of the PRA Rules and Solvency II regulations on which they are based.

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

The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud.

Based on our understanding of the Company and the insurance sector in which it operates, we considered that non-compliance with the following laws and regulations have a material effect on the relevant elements of the Single Group-Wide Solvency and Financial Condition Report: permissions and supervisory requirements of the Prudential Regulation Authority ('PRA') and the Financial Conduct Authority ('FCA').

To help us identify instances of non-compliances with these laws and regulations, and in identifying and assessing the risks of material misstatement in respect to non-compliance, our procedures included but were not limited to:

- Inquiring of the directors and management as to whether the company is in compliance with laws and regulations, and discussing their policies and procedures regarding compliance with laws and regulations;
- Inspecting correspondence with relevant licensing or regulatory authorities;
- Communicating identified laws and regulations to the engagement team and remaining alert to any indications of non-compliance throughout our audit; and
- Considering the risk of acts by the Company which were contrary to applicable laws and regulations, including fraud.

We also considered those laws and regulations that have a direct impact on the preparation of relevant elements of the Single Group-Wide Solvency and Financial Condition Report such as the Solvency II regulations.

In addition, we evaluated the Directors' and management's incentives and opportunities for fraudulent manipulation of the relevant elements of the Single Group-Wide Solvency and Financial Condition Report, including the risk of override of controls and determined that the principal risks were related to posting manual entries to manipulate own funds against the Solvency Capital Requirement or Minimum Capital Requirement; management bias through judgements and assumptions in significant estimates, in particular in relation the valuation of technical provisions, and significant one-off or unusual transactions.

Our audit procedures in relation to fraud included but were not limited to:

- Making enquiries of the directors and management on whether they had knowledge of any actual, suspected or alleged fraud;
- Gaining an understanding of the internal controls established to mitigate risks related to fraud;
- Discussing amongst the engagement team the risks of fraud;
- Addressing the risks of fraud through management override of controls by performing journal entry testing; and
- Critically assessing accounting estimates for evidence of management bias, particularly in relation to the estimation of technical provisions.

There are inherent limitations in the audit procedures described above and the primary responsibility for the prevention and detection of irregularities including fraud rests with management. As with any audit, there remained a risk of non-detection of irregularities, as these may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal controls.

A further description of our responsibilities for the audit of the financial statements 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 auditor's report.

#### **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. The group member has authority to calculate their 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 the group member's application or approval order.

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

In accordance with Rule 4.1 (3) of the External Audit Chapter of the PRA Rulebook for Solvency II firms we are 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.

**Use of the audit report**

This report, including the opinion, has been prepared for the Directors of the Company to enable them to comply with their obligations under External Audit Rule 2.1 of the Solvency II Firms Sector of the PRA Rulebook and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Directors for our audit work, for this report, or for the opinions we have formed.

*Lionel Cazali*

Mazars LLP  
Chartered Accountants and Statutory Auditors  
30 Old Bailey  
London  
EC4M 7AU  
Date: 08 March 2023

**Appendix – relevant elements of the 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 2022

### 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 2022.

**KEY ELEMENTS OF THE SECTION ARE:**

- Business Information;
- Underwriting Performance;
- Investment Performance; and
- Performance from Other Activities.

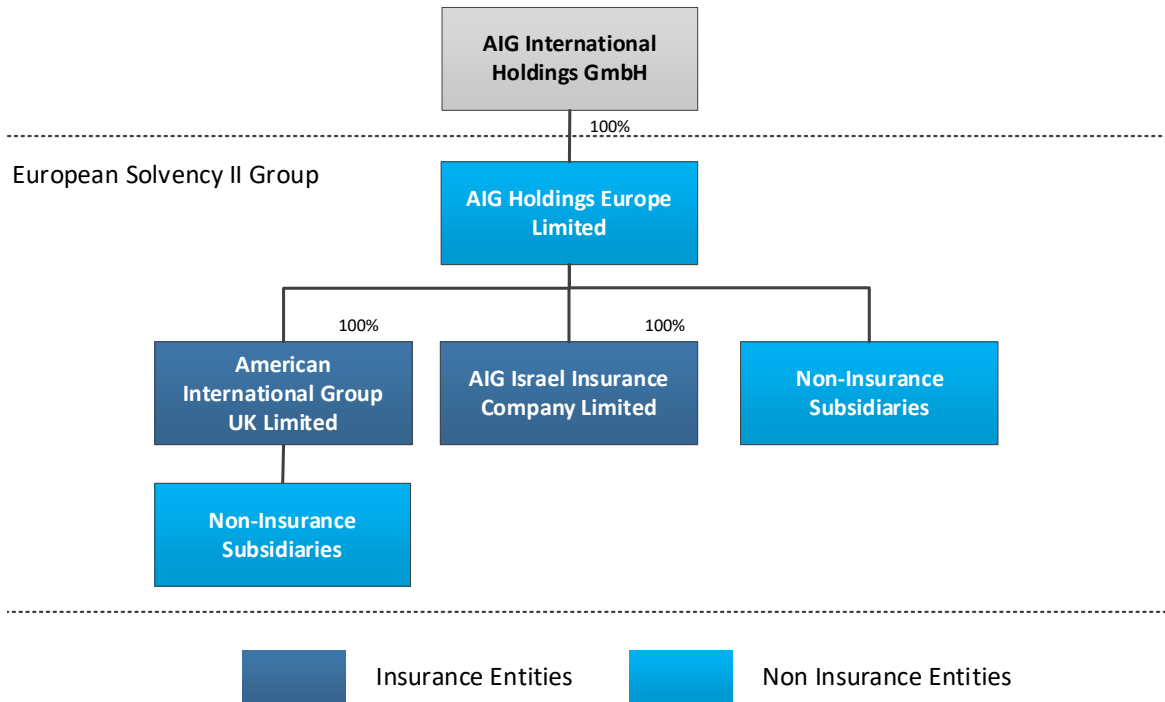
## A.1 BUSINESS

### AIG HOLDINGS EUROPE LIMITED INFORMATION

The AHEL Group has a simple structure to enable efficient decision making and delegation of responsibilities. The component entities of AHEL are fairly autonomous in their own right.

AHEL is a wholly owned subsidiary of AIG International Holdings GmbH, 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 of 30 November 2022 is shown in the diagram below:



AIG UK is an insurance company incorporated in the United Kingdom authorised and regulated by the Prudential Regulation Authority (PRA) and the Financial Conduct Authority (FCA). AIG UK is the core subsidiary of AHEL, representing 80% of the Group's net assets as at 30 November 2022. AIG UK Ltd 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.

AIG UK is in scope of Solvency II.

The 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 is a single group wide SFCR that covers AHEL and AIG UK.

The SFCR is presented in pounds sterling rounded to the nearest million, and the attached public quantitative reporting templates (QRTs) in Appendix F are presented in pounds sterling, rounded to the nearest thousand as set out in Article 2 of the Commission Implementing Regulation (EU) 2015/2452. Rounding differences of + / - one unit can occur. The functional and reporting currency of AHEL is pounds sterling.

AHEL's second insurance company, AIG Israel has been granted licence by the Israeli Commissioner of the Capital Markets and Insurance (ICCM) 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.

AHEL'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**

Mazars LLP  
Chartered Accountants and Statutory Auditors  
30 Old Bailey  
London  
EC4M 7AU  
+44 (0) 20 7063 4000

**Supervisory 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 7 March 2023.

## A-1 Significant Business Developments or Other Events

### Russian Invasion of Ukraine

Following the Russian invasion of Ukraine on 24 February 2022, the Company has continuously assessed and monitored the potential impacts and the potential exposures to its business and any potential overall impact to financial performance due to the resulting economic and political developments. The Company does not hold any material reserves related to policyholder claims arising from the Russian invasion of Ukraine and is not involved in any material litigation regarding claims arising from the Russian invasion of Ukraine. The Company has potential exposures to policyholder claims in various lines of business, predominantly in Aviation and Credit, and continues to monitor these potential exposures. There is a high degree of uncertainty in relation to the value of these potential exposures. AIGUK does not hold any investments directly in Russia or Ukraine.

### Inflation

Inflation is a key area of judgement and uncertainty within the reserving analysis, particularly considering the rapidly changing inflationary environment.

AIG UK underwrites both property and liability lines. Since the majority of the book is the long-tailed Casualty and Financial Lines, AIG UK could have significant exposure to inflation risk especially during the periods of severe or prolonged inflation.

Inflation is primarily a risk to liability business, where claims with long settlement periods are exposed to substantial inflationary risk between loss occurrence and loss settlement. The long tail in some liability lines is also caused by latent claims. The examples of latent claims include medical latent claims due to occupational diseases such as those from asbestos, environment impairment liability claims etc. For such claims, the nominal values of the claims can change substantially between the time of underwriting the policies and the manifestation and filing of the claims. In addition, indexed annuity style claims such as those of Periodic Payment Orders (PPOs) are also impacted by rising inflation and, in particular, persistent inflation. The type of inflation is key to how PPOs are impacted (medical inflation / carers cost).

**MATERIAL PARTICIPATING UNDERTAKINGS**

AHEL's participating undertakings as at 30 November 2022 are listed in the table below.

Participation	Principal Activity	Country	Ownership
American International Group UK Limited	UK non-life insurer operating in the UK	UK	100%
AIG Israel Insurance Company Limited	Israel insurer specialising in retail general, life and health insurance policies	Israel	100%
AIG Europe (Services) Limited	Provision of operational and administrative services to affiliates within the AIG Inc. group	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%
The CI Group Holdings Limited	Provision of commercial insurance brokerage and intermediary services	UK	19.9%

AIG UK operate from the UK and AIG Israel operates from Israel. AHEL does not have any branches. More than 1,900 staff and 760 in Israel) facilitate the operation of the companies specialising 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.

AHEL's 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.

As of 30 November 2022, the last Major Model Change for AHEL's PIM was approved by the PRA on 30 January 2022. This Major Model Change application was triggered by the purchase of and ADC Reinsurance contract which changed the risk profile of AIG UK. AIG Israel is modelled using the SF. An application for a Major Model Change was submitted to the PRA on 11 November 2022, as the approval date for this will be post 30 November 2022, AHEL and AIG UK are bound to report against the reporting view of the SCR prior to the Major Model Change application. As such, the reported SCR does not reflect model changes up to the year-end 2022 which provided further reductions in the SCR.

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

Whilst the SF 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 SF SCR is more rigidly defined, formulaic and not calibrated to accurately reflect the complexities of a diverse multinational insurance firm such as AHEL.

AHEL's PIM 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.

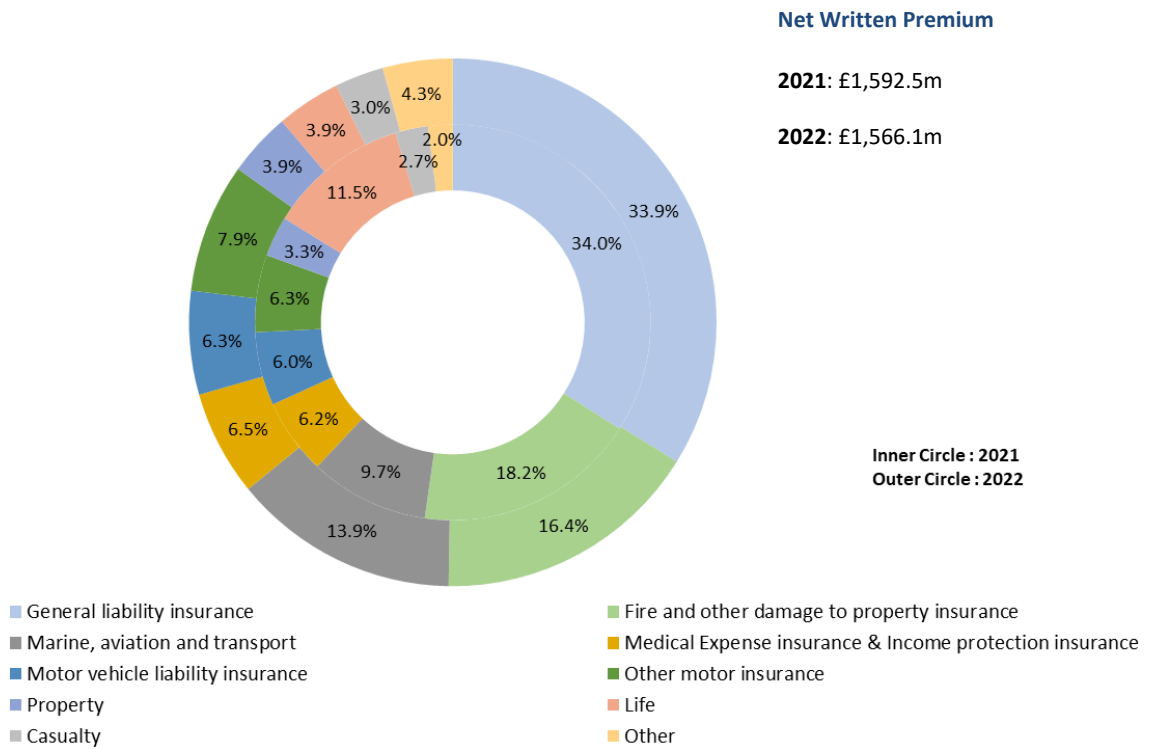


**AHEL MATERIAL LINES OF BUSINESS BY OPERATING SEGMENT AND SOLVENCY II**

AIG UK is the largest insurance subsidiary, contributing 82% of AHEL’s aggregated net written premiums for FY2022. AIG UK’s business segments are organised into Commercial and Consumer lines. Commercial lines refer to products and services for the commercial and institutional customers. 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 18% of AHEL’s aggregated net written premium for FY2022. 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.

**Solvency II LoB**



Under Solvency II, insurance products and offerings are categorised into 16 standardised Solvency II lines of business (LoB). The Group’s most material Solvency II LoBs by Net Premiums Written in 2022 are shown above.

Source Group QRT S.05.01

## A.2 UNDERWRITING PERFORMANCE – AH EL

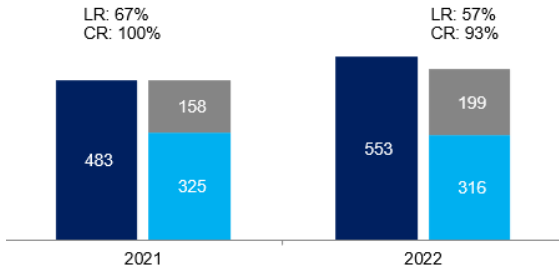
### UNDERWRITING PERFORMANCE BY MATERIAL LINES OF BUSINESS AND MATERIAL BUSINESS ENTITY

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

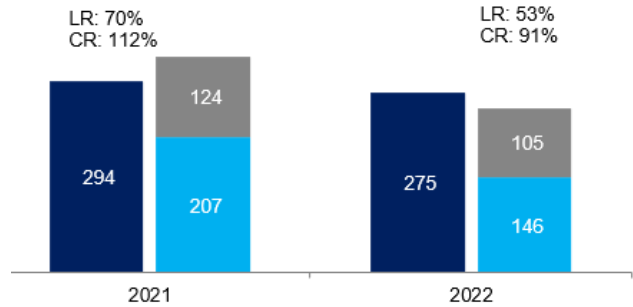
The diagrams below provide key performance indicators (Net Premium Earned, Claims Incurred and Expenses) for major Solvency II lines of business as per the Group QRT S.05.01. The Loss and Combined Ratios are on a net basis.

##### General Liability



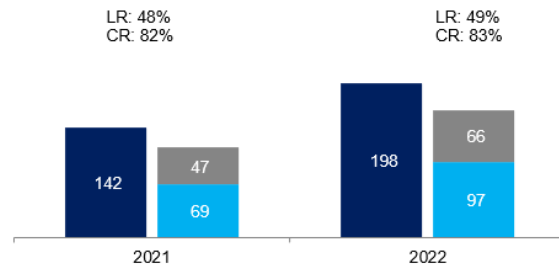
The General Liability portfolio is the largest portfolio in respect of claims reserves and premium volumes. It contains the long-tailed Casualty and Financial lines of business. In comparison to 2021, the premiums increase is a result of the positive rate environment and new business led growth, the combined ratio has reduced in 2022 due to a reduction in the claims loss ratio. The decrease in LR is driven by the current accident year and is a result of improved portfolio quality through cumulative rate increases achieved in excess of loss cost trends and decreased exposures.

##### Fire and Other Damage to Property



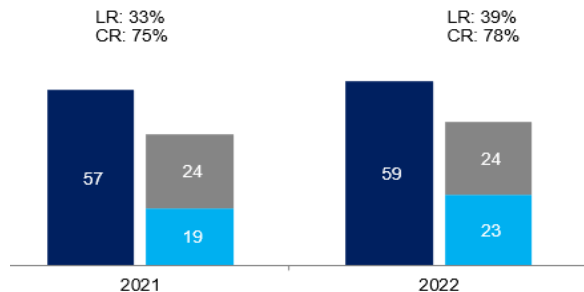
Fire portfolio consists primarily of property damage and energy lines of business. It is a short-tailed book where the losses are reported and settled quickly. In comparison to 2021, the combined ratio is lower due to the claim's loss ratio decreasing. This is a result of favourable prior year claims development in Property due to favourable attritional loss experience and reduction of prior year CAT loss estimates.

##### Marine, Aviation and Transport



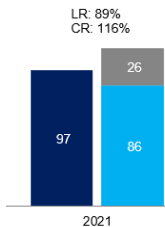
The Marine, Aviation and Transport portfolio contains Aviation and Marine hull, cargo, liability and products insurance. In comparison to 2021, the increase in premiums is driven by Covid-19 impacts on Aviation in 2021 and the underlying new business led growth.

##### Income Protection

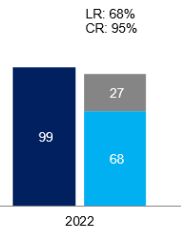


The increase in loss ratio is driven by slightly higher attritional claim activity in 2022.

##### Motor



##### Vehicle



##### Liability

■ Premiums ■ Claims ■ Expenses

LR – Loss Ratio  
CR – Combined Ratio

For the Motor Vehicle Liability portfolio, the overall loss ratio has reduced in comparison to 2021. The reduction reflects the benign claims experience for motor vehicle liability and portfolio improvement actions taken in the recent years

## A.2 Underwriting Performance – American International Group UK Ltd

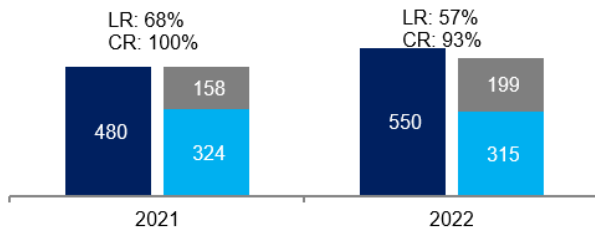
### UNDERWRITING PERFORMANCE BY MATERIAL LINES OF BUSINESS

#### A.2.B AMERICAN INTERNATIONAL GROUP UK LIMITED

##### A.2.B1 UNDERWRITING PERFORMANCE BY SOLVENCY II LINES OF BUSINESS

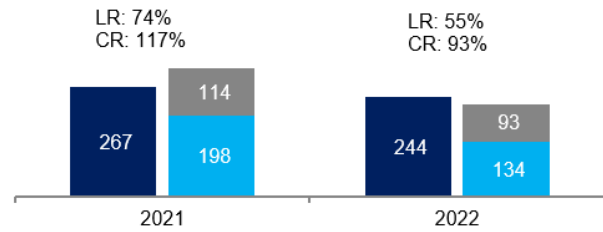
The diagrams below provide key performance indicators (Net Premium Earned, Claims Incurred and Expenses) for major Solvency II lines of business as per AIG UK QRT S.05.01. The Loss and Combined Ratios are on a net basis.

#### General Liability



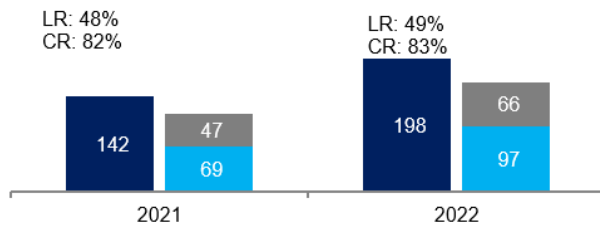
The General Liability portfolio is the largest portfolio in respect of claims reserves and premium volumes. It contains the long-tailed Casualty and Financial lines of business. In comparison to 2021, the premiums increase is a result of the positive rate environment and new business led growth, the combined ratio has reduced in 2022 due to a reduction in the claims loss ratio. The decrease in LR is driven by the current accident year and is a result of improved portfolio quality through cumulative rate increases achieved in excess of loss cost trends and decreased exposures.

#### Fire and Other Damage to Property



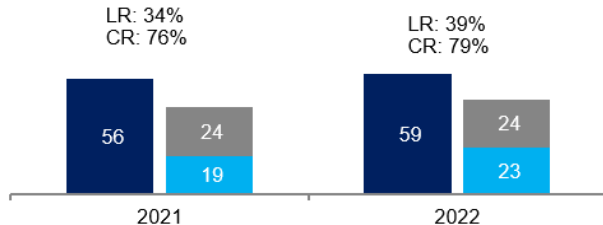
The Fire portfolio consists primarily of property damage and energy lines of business. It is a short-tailed book where the losses are reported and settled quickly. In comparison to 2021, the combined ratio is lower due to the claim's loss ratio decreasing. This is a result of favourable prior year claims development in Property due to favourable attritional loss experience and reduction of prior year CAT loss estimates.

#### Marine, Aviation and Transport



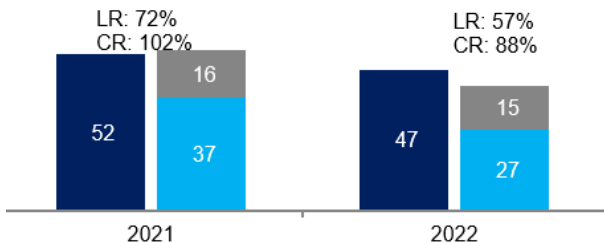
The Marine, Aviation and Transport portfolio contains Aviation and Marine hull, cargo, liability and products insurance. In comparison to 2021, the increase in premiums is driven by Covid-19 impacts on Aviation in 2021 and the underlying new business led growth.

#### Income Protection



The increase in loss ratio is driven by slightly higher attritional claim activity in 2022.

#### Motor Vehicle Liability



For the Motor Vehicle Liability portfolio, the overall loss ratio has reduced in comparison to 2021. The reduction reflects the benign claims experience for motor vehicle liability and portfolio improvement actions taken in the recent years.

■ Premiums ■ Claims ■ Expenses  
 LR – Loss Ratio  
 CR – Combined Ratio

## A.3 Investment Performance

### A.3.A AHEL INVESTMENT RETURN

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

AHEL's investment performance by asset class for 2022 and 2021 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	
	2022	2021	2022	2021	2022	2021	2022	2021
Corporate Bonds	76.8	81.7	0.1	(22.8)	(314.0)	(65.1)	(237.2)	(6.3)
Government Bonds	24.3	27.5	9.2	(30.0)	(182.5)	(13.8)	(149.0)	(16.2)
Securitised Assets	1.1	2.7	3.9	0.7	-2.7	1.4	2.3	4.8
Mutual Funds	-	-	3.1	59.2	2.3	14.5	5.4	73.7
Equity Instruments	0.5	-	-	-	-	10.5	-	10.5
Loan Participations	13.3	17.3	2.1	0.6	(7.5)	(1.7)	7.9	16.2
Short Term Deposits	1.6	0.3	-	-	-	-	1.6	0.3
<b>Total</b>	<b>117.7</b>	<b>129.4</b>	<b>18.4</b>	<b>7.7</b>	<b>(504.5)</b>	<b>(54.2)</b>	<b>(368.9)</b>	<b>82.9</b>

Source: AIG UK, AIG Israel QRT S.09.01.01

£368.9m of total investment losses are made up of:

- £504.5m unrealised losses arising primarily from corporate and government bonds over the year due to increases in market yields between 2021 and 2022;
- £18.4m on realised gains arising primarily from government bonds, mutual funds and loan participations during the year; and
- £117.7m investment income mostly representing the coupons and interests received or accrued over the year from corporate and government bonds.

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

AIG UK’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 AIG UK’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, AIG UK holds a diversified investment portfolio that is invested in government bonds, corporate bonds, securitised assets, loans, real estate funds, equities, investments in group undertakings and cash.

AIG UK measures its investment performance using total investment return from Investment Income and other gains and losses comprising of realised and unrealised gains and losses and impact of movements in foreign exchange rates.

Asset Classes £'m	Gross Investment Income		Realised Gains and Losses		Unrealised Gains and Losses (recognised in Equity)		Total Investment Return	
	2022	2021	2022	2021	2022	2021	2022	2021
Corporate Bonds	73.0	70.1	2.2	(19.6)	(298.4)	(62.7)	(223.2)	(12.2)
Government Bonds	23.6	26.2	9.7	(18.4)	(174.1)	(13.7)	(140.9)	(5.9)
Securitised Assets	1.1	2.7	3.9	0.7	(2.7)	1.4	2.3	4.8
Real estate Funds	-	-	3.1	59.6	5.3	9.2	8.4	68.8
Equity Instruments	-	-	-	-	1.7	10.5	1.7	10.5
Loan Participations	13.3	3.1	2.1	0.6	(7.5)	(1.7)	7.9	2.0
Short Term Deposits	1.8	0.3	-	-	-	-	1.8	0.3
<b>Total</b>	<b>112.8</b>	<b>102.4</b>	<b>21.0</b>	<b>22.9</b>	<b>(475.5)</b>	<b>(57.0)</b>	<b>(341.9)</b>	<b>68.3</b>

**UNREALISED GAINS AND LOSSES RECOGNISED IN EQUITY**

Net unrealised losses recognised in equity in 2022 amount to £476m (2021: £57m).

**INVESTMENTS IN SECURITISATION**

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

Investments in Securities, £m	2022	2021
Collateralised loan obligations	30.5	29.3
CMBS	11.2	14.3
<b>Total</b>	<b>41.7</b>	<b>43.6</b>

## A.4 Performance from Other Activities

### A.4.A AIG HOLDINGS EUROPE LIMITED

No other activities are material to AHEL.

### A.4.B AMERICAN INTERNATIONAL GROUP UK 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	2022	2021
Net foreign exchange gain / (loss)	118.8	(0.9)
Administrative expenses	148.9	113.2

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 HOLDINGS EUROPE LIMITED

As at 30 November 2022, there is no other material information regarding Business and Performance of AHEL.

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

As at 30 November 2022, there is no other material information regarding Business and Performance of AIG UK.



## Solvency & Financial Condition Report 2022

### 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

AHEL's 'General Information on the System of Governance' subsection of the report aims to provide details of the underlying management structures of the company and its subsidiaries.

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

AHEL's business strategy and operations operate within its subsidiary's governance structure, of which the management of risk plays a significant part. Governance starts with the Board, which has overall responsibility for oversight of the company and its subsidiaries who operate a framework of prudent and effective controls enabling the Company's risks to be identified, assessed and managed.

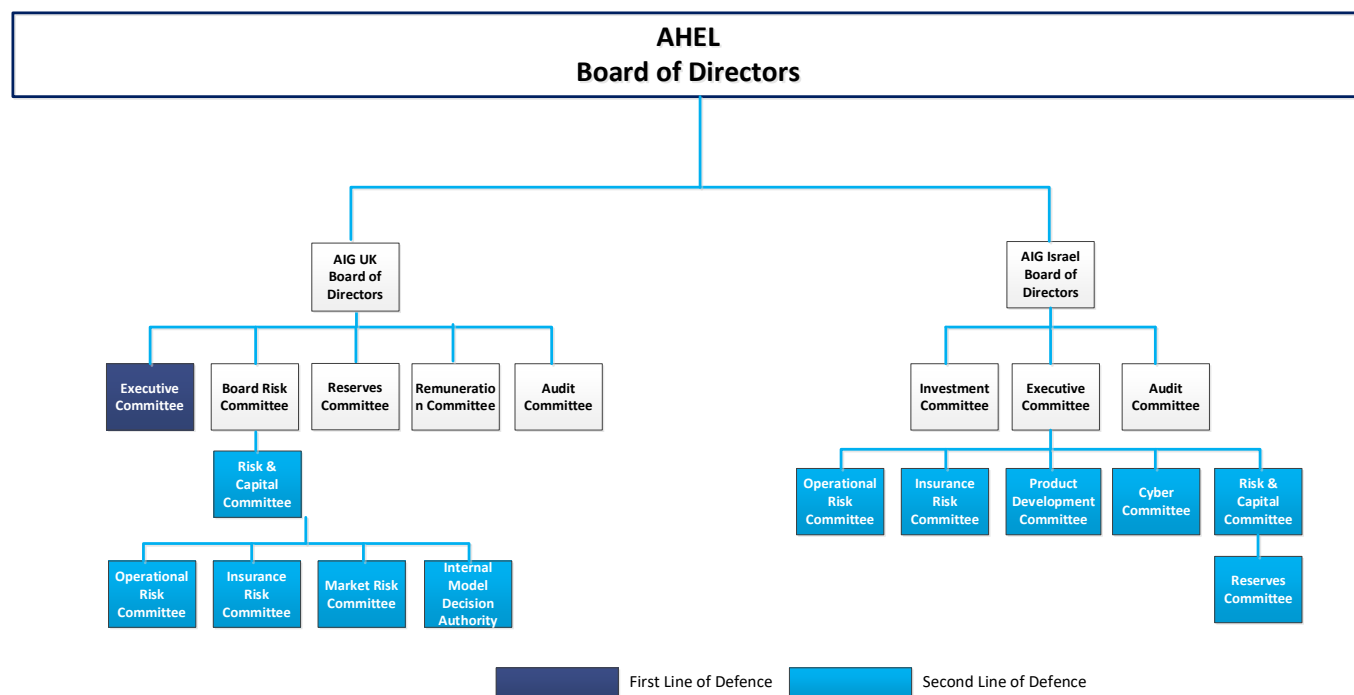
Included in the governance framework is the Risk Management Framework which supports AHEL and its subsidiaries' risk culture. The risk framework covers the Company's subsidiaries' businesses, operations functions and risk areas and establishes risk committees, risk reporting and risk controls. The risk governance structure works to provide an oversight and decision-making framework that operates to identify, assess, monitor and manage material risks, utilising outputs from the Economic Capital Model (ECM), where appropriate.

The governance structure in AHEL and its subsidiaries has three levels of committees:

- 1) Subsidiary Board committees
- 2) Subsidiary Executive Risk and other executive committees; and
- 3) Ad hoc working groups.

This governance structure supports a strong risk culture integrating risk management with regulatory requirements and business activities such as strategy and planning. The organisation chart below provides a high-level overview of the Company's governance structure:

#### AHEL STRUCTURE



#### AHEL BOARD

The AHEL Board operates to provide oversight of the management of the Company's subsidiaries. The Board ensures it has visibility across its key subsidiaries to enable it to identify risks which are not apparent when looking at the solo entities. The Board is responsible for maintaining the Group SCR and adhering to Solvency II.

The Board meets at least four times a year and is composed of a mix of AIG UK Executive Directors and an Independent Non-Executive Director. The composition of the Board has a balance of skills, experience, challenge and debate and operates so that no individual or small group of individuals can dominate its decision taking.



**Allocation of responsibilities**

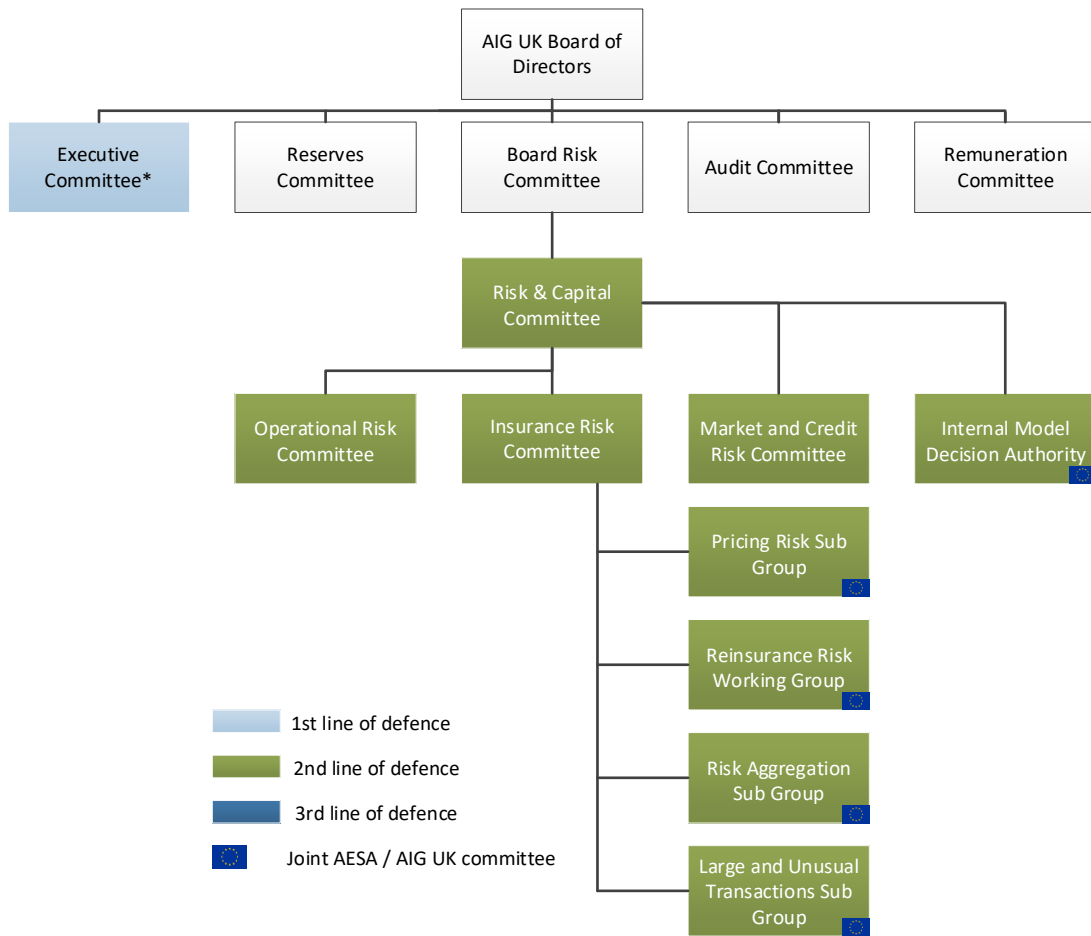
The Board fulfils its duties through reporting as required by its Terms of Reference managed through a standing items schedule. The Board delegates the management and governance of its subsidiaries to the Boards of AIG UK and AIG Israel. This system of governance model avoids duplicative and disproportionate reviews at the AHEL Board level and is both adequate and appropriate for the overall structure. The underlying insurance subsidiaries have appropriate and adequate governance structures in place including various risk sub committees established in compliance with local laws and regulation.

AIG UK 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', i.e., Compliance, Risk, Audit and Actuarial.

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

- 1) 'Management Responsibility Maps' for the UK regulated subsidiaries
- 2) Senior Manager and Certification Regime (SMCR) documentation including Fit and Proper Policy for the UK regulated subsidiaries
- 3) Structure charts; and
- 4) Documented roles and responsibilities for the UK subsidiary Boards and their controlled functions

Similar governance structures are in place for AIG Israel, appropriate to its size and complexity.



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

Authority in AIG UK 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 in AIG UK to ensure they are being managed within the Board-approved risk appetite.

The Reserves Committee is responsible to ensure that AIG UK maintains reasonable and adequate technical reserves and to oversee and manage reserving risk with the risk appetite.

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

The 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, as above. The outputs of the risk management processes are reported through the committee structure with each ORSA report and its underlying components reviewed and challenged at each level and approved by the Board.

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

### 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 (ExCo).

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

ERM provides insight and risk reports to these committees.

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 semi-annually, chaired by the Chief Actuary. 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 underlying assumptions used in the pricing models.
- **Product Development Committee (PDC)** convenes at least 6 times a year and is chaired by the Compliance and Complaints Department 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)** 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)** 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.

### THE "THREE LINES OF DEFENCE" MODEL

The AHEL Risk Management Framework as embedded in its subsidiaries is based on the "Three Lines of Defence" model. This structure allows for each subsidiaries functions and individuals to have a clear understanding of their risk management responsibilities and aids embedding an effective risk culture.

#### Overview of Management and Governance - AIG UK Board of Directors

The Board has responsibility for the oversight and management of AIG UK. Its role is to provide entrepreneurial leadership within a framework of prudent and effective controls which enables each of the risks to be assessed and managed. The Board is responsible for promoting the long-term success of AIG UK whilst securing an appropriate degree of protection for policyholders. Its objectives are to set AIG UK's strategic aims, monitor management's performance against those strategic aims, set the risk appetite, ensure AIG UK is adequately resourced and that effective controls are in place. 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 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 AIG UK'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 and business plans for and managing operational issues relating to the UK. It is responsible to the Board for the day-to-day management and oversight of the UK operations. It develops strategies through business and capital plans and proposes these for approval by the Board. Once approved ExCo is responsible for implementing these. ExCo forms part of the first line of defence. The ExCo is composed of the CEO and a mix of senior executives and controlled functions.

The ExCo receives reports from the business, operational and controlled functions to enable it to monitor progress against the strategy and business plan. It also maintains an oversight of transformation projects and other strategic initiatives. The ExCo reports into the Board via the CEO and achieves coordination with wider AIG Inc. Group strategy via the reporting lines of its individual members.

**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.

ERM partners with the business in providing advice, guidance and challenge in managing their risks.

**Board Risk Committee**

The role of the BRC is to challenge, oversee and monitor the management of risks within AIG UK 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 at least three Independent Non-Executive Directors, the CEO, the CRO and the General Counsel. Its standing attendees include the Head of Internal Audit. The BRC reviews the Risk Review of the Annual 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 BRC chair provides a verbal summary report to the Board on key discussions and actions of the BRC.

Where the BRC asks for further information or for particular issues to be addressed and reported on, the 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 executed.

**Reserves & Underwriting Committee**

The role of the Reserves & Underwriting Committee is to ensure that AIG UK maintains reasonable and adequate technical reserves and to oversee and manage all forms of reserving risk assumed or accepted by AIG UK. The Reserves & Underwriting Committee is part of the second line of defence. The Reserves & Underwriting Committee is composed of at least three of the Independent Non-Executive Directors, the CEO, the CRO, the CFO, the Chief Actuary, the Head of Claims and representatives from the Product lines. Standing attendees include the Head of Internal Audit. The Reserves & Underwriting Committee chair provides a verbal summary report to the Board on key discussions and actions of the BRC.

**Risk and Capital Committee**

The RCC is authorised by the BRC and by the ExCo to manage the risk profile of AIG UK within the risk governance framework and risk appetite approved by its Board of Directors.

This Risk Management Framework is 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 ORSA and, ultimately, the half-yearly ORSA reports.

The Insurance Risk Committee 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 group 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 review the reinsurance strategy and to recommend 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 is committed. The LUT is an ad-hoc meeting of the RCC.

The Market Risk Committee (MRC) meets at least four times a year and any such time as required to focus on the entire balance sheet by monitoring and managing the Market Risk, Investment Risk, Counterparty Credit Risk and Liquidity Risk profile of AIG UK.

The RCC also delegates responsibility to the Internal Model Decision Authority to cover specific aspects of 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 by ExCo to the Product Development Forum thus helping to ensure any conduct risk associated with the development and launch of products is appropriately managed. ERM is represented in these fora.

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 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 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 RCC chair reports to the BRC and ExCo on key issues arising in RCC meetings which the RCC 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.C THIRD LINE OF DEFENCE**

#### **Internal Audit Function**

The Internal Audit function delivers the "Third Line of Defence" by providing independent and objective assurance designed to support AIG UK in achieving its defined objectives, as well as supporting the Board, through the Audit Committee, in discharging their governance responsibilities and providing assurance on the appropriateness and effectiveness of internal controls. Refer to 'B.1.A.D' of this report for details of key functions, roles and responsibilities.

#### **Audit Committee**

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, CRO, Head of Internal Audit and the lead partner of the External auditors are standing invitees.

The Audit Committee reports directly to the Board through a verbal report from the Chair which highlights material issues which the Audit 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 for approval.

The role of the Audit Committee includes:

- Assisting the Board in discharging its responsibilities for the integrity over 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 compliance with legal and regulatory requirements including approval of Solvency II policies and regulatory returns prior to being approved by the Board.

### **B.1.A.D Key functions, roles and responsibilities for AHEL's subsidiaries**

Persons who effectively run AHEL or have other key functions are required to meet the fit and proper requirements. The system of governance in the insurance subsidiaries each has a finance function, a risk management function, a compliance function, an actuarial function and an 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 – AIG UK – Chief Financial Officer (CFO)**

The AIG UK Finance function is led by the CFO who is a member of the AIG UK ExCo and is responsible for overseeing the leadership finance controllership, capital management, reinsurance, taxation and treasury. The AIG UK Finance controlling team is responsible for recording and organising the financial transactions generated by other departments.

The Finance function has the following key responsibilities:

- External reporting for AIG UK 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 Finance function has established adequate internal controls over Solvency II reporting which are overseen by the Board and are designed to provide reasonable assurance that the SCR calculation is complete, accurate and is underpinned by an appropriate level of data governance.

AIG UK'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 that Solvency II reporting tools are 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 Internal Audit function of quarterly and annual submissions including review of controls.

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

The AIG UK's ERM function oversees the delivery of the Risk Management Framework. The function is led by the CRO who is a member of the AIG UK ExCo. The ERM function implements AIG UK's Risk Management Framework 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);
- Liquidity Risk;
- Credit Risk (including risks associated with utilisation of reinsurance and other risk mitigation techniques);
- Operational Risk; and
- Business & Strategy Risk.

The AIG UK ERM function supports the UK's risk operations. 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.

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.

## 3) Compliance Function – AIG UK – Regional Chief Compliance Officer

AIG UK Compliance is organised in accordance with the AIG Global Compliance Group (GCG) Structure, which ensures a common approach to compliance activities across AIG and provides a framework for Compliance risks to be identified, measured, managed, monitored, and reported. Compliance works closely with the business to ensure that good customer outcomes and the right market behaviours are demonstrated. The UK Compliance function is led by the Regional Chief Compliance Officer, who is supported by the UK Compliance team. Subject Matter Expert teams for Privacy, Financial Crimes, and Monitoring & Testing provide input and Compliance Operations support where required. The Compliance function has the following responsibilities:

- Compliance Policies and Procedures: AIG's compliance policy issuance is governed by the AIG Global Policy Management Policy overseen by the AIG Inc. Policy Governance Unit. The Policy defines a framework that is designed to provide consistency across the AIG Inc. Group in the development, implementation, and maintenance of policies, which are documents that communicate the principles, rules and expectations of AIG Inc. UK Compliance, 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 Inc. Policy Portal.
- Subject Matter Expertise: GCG has subject matter expertise with regard to Key Compliance Risks, which are evaluated as part of the annual 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 Units, in order to assist businesses with the management of locally-required compliance risk issues, the Compliance teams, including the FCG and Privacy group, provide advisory guidance for these matters.
- Advisory Services: AIG UK Compliance provides guidance and advice on various compliance risk-related matters in order to assist Business Units 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: AIG UK Compliance participates in an annual global compliance risk assessment ("CRA") program to facilitate the identification, assessment, and measurement of Key Compliance Risks. As part of this overall programme, the AIG UK Compliance teams evaluate the inherent risk ratings, applicable key controls, and residual risk ratings for Key Compliance Risks. The CRA includes the evaluation of key laws and regulations; policies, procedures, and processes; training; compliance-related external and internal risk events; and testing results, as well as relevant Audit and Regulatory reports related to Key Compliance Risks.
- Compliance Testing: GCG maintains a function-wide testing program designed to verify that business operations comply with certain AIG Inc. and Business Unit policies and standards, as well as key laws and regulations. The testing program covers Key Compliance Risks that have been agreed upon with Operational Risk Management. The programme is managed by the Testing group who are responsible for the execution of the approved Test plan.
- Compliance Data Analytics & Monitoring: A function-wide Data Analytics & Monitoring program has been designed to provide ongoing surveillance, review and analysis of key risk indicators to identify red flags and potential compliance violations. It will assist management through data driven risk insights, analytics and automation, in determining where it might need to focus efforts in order to enhance process and control effectiveness, and/or address emerging risks. In addition to this, AIG UK Compliance is responsible for a local 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 and 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 Risks. The training program is designed to enhance employee knowledge and understanding of compliance policies and procedures, laws, regulations and standards of good business conduct. AIG UK Compliance is responsible for developing a local training program tailored to Key Compliance Risks specific to the AIG UK Business Units.

## 4) Actuarial Function – AIG UK – Chief Actuary

The Actuarial function is led by the Chief Actuary. The Chief Actuary is a member of the AIG UK ExCo and works closely with other ExCo members including the CEO, CFO, CRO and underwriting leadership among others. 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 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 provide 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 AIG UK to trade in such a way that risk data and exposure data is captured, allowing for a more robust premium rate management environment across AIG UK.
- **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 UK's largest liability on its balance sheet; hence an accurate valuation of reserves is critical for AIG UK to run its business effectively. The Actuarial Function makes reserving recommendations to the Reserves Committee which, in turn, reports to the Board.
- **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 UK'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 risk profile. Actuarial also helps calculate the Insurance Risk elements of the SF requirements 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 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. The execution of the underwriting initiatives in the budget are tracked and reported during the course of the year.
- **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 AIG UK's 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 – AIG UK – Head of Internal Audit**

Internal Audit's mission is to enhance and protect enterprise value by providing stakeholders with objective assurance, advice, and insight. They assist the Company in accomplishing its objectives by bringing a systematic and disciplined approach to evaluate and improve the adequacy and effectiveness of AIG UK's control environment, including risk management, internal control, and governance processes.

The Internal Audit function is led by the Head of Internal Audit and is responsible for developing and maintaining a risk-based programme of audit coverage, which includes activities such as audits, reviews of transformation initiatives, continuous monitoring, and issue validation. The programme consists of:

- Evaluating the effectiveness of risk management and risk culture in the context of AIG's strategic objectives and risk appetite, including whether risks are appropriately identified and managed
- 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 applicable laws and regulations
- Evaluating the effectiveness, sustainability, and timely implementation of corrective actions to remediate issues
- Reporting periodically on Internal Audit's purpose, authority, responsibility and performance relative to its plan and organisational objectives
- 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

**Internal Audit Independence and Objectivity**

The independence of Internal Audit is fundamental to its ability to deliver objective coverage of all businesses and corporate functions. The Head of Internal Audit ensures that Internal Audit remains free from all conditions that threaten the ability of its personnel to carry out their responsibilities in an unbiased manner, including matters of audit selection, scope, procedures, frequency, timing, and report content. This is achieved through the following

- The Head of Internal Audit reports directly to the Audit Committee, with no reporting line to local management. Internal Audit is a global function, where the global Chief Audit Executive has a direct reporting line to the AIG Inc. Audit Committee, and an administrative reporting line to the CEO; this establishes Internal Audit's position within the organisation and permits the Internal Audit Group to continue to render impartial and unbiased judgments.
- 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 authorised to designate members of the audit staff to have such full and complete access in discharging their responsibilities.
- The Head of Internal Audit will confirm the organisational independence of Internal Audit to the Audit Committee annually, as well as disclose to the Committee any interference and related implications. Internal Audit personnel may not have operational responsibility or authority over any of AIG UK's business activity or personnel outside of Internal Audit, and may not implement internal controls, develop procedures, install systems, prepare records, or engage in any other activity that may impair their judgment.
- The Audit Committee is responsible for recommending the approval of the appointment or termination of the Head of Internal Audit.

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

There were no material changes during 2022 in AHEL’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 AIG Group’s compensation philosophy.

**Principles of the AIG Group’s 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 short term 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.

**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 AIG Group 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 AIG Inc. Group 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.

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 AIG Inc. Group’s 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 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.

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 AIG UK 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.

**Compensation**

The Total Direct Compensation (TDC) 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

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

**Risk and Compensation Plans**

The AIG Group 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 AIG Group’s compensation practices are integral parts of its approach to risk management, and the AIG Group Remuneration Committee regularly monitors the AIG Group’s compensation programmes 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 AIG UK 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 AHEL's subsidiary processes for assessing the fitness and propriety for persons who effectively run the UK regulated subsidiaries or the key functions.

**Assessment of fit and proper of the UK regulated subsidiaries**

Persons who are identified as Senior Management functions under the SMCR operating in the UK are usually the senior managers who are effectively running AIG UK or are key function holders. Senior Manager and Certification functions are required to meet the fit and proper requirements. AIG UK has established fit and proper policies and processes that comply with the SMCR Regime. The process requires AIG UK to check whether those taking up designated roles are fit and proper and to test those designated as Certification Functions on an annual basis. These processes are documented in various SMCR manuals and fit and proper policies approved by their Boards.

**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****AHEL GROUP****Risk Management Overview, Strategy and Objectives**

The Risk Management Framework 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 the AHEL level, the focus is on assessing the major risk themes 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 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 ORSA.

**Risk Culture**

AHEL has an ongoing commitment towards maintaining an effective risk culture, as it is critical to our 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.
- **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 AHEL. 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.

**AHEL GROUP INTERNAL MODEL**

AHEL has developed an Economic Capital Model (ECM), which was approved in July 2017 by the PRA. The ECM captures all risks within AHEL excluding AIG Israel. The SF is used to calculate the capital requirement for AIG Israel. This means that, at a Group level, the ECM is a PIM which has to be integrated with the SF in order to calculate the Group SCR.

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

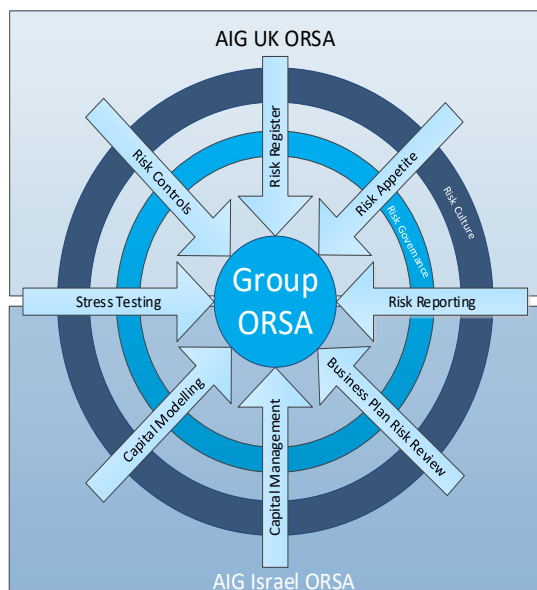
Following the concept of Integration Technique 1, AHEL's Group SCR will be the sum of the:

- Capital requirement of the PIM primarily focused on AIG UK.
- Capital requirement of the SF primarily focused on AIG Israel combined.

There are no identified Solvency II categorised risks that are out of scope of the model. There are no intangible assets not included in EBS.

**GROUP OWN RISK AND SOLVENCY ASSESSMENT**





AHEL's ORSA looks at the current and forward-looking risk profile of AHEL and its insurance subsidiaries; AIG UK and AIG Israel. The AHEL ORSA is performed, reviewed and approved annually.

AIG UK 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 key subsidiaries prepare an ORSA report annually. The ORSA reports are reviewed, challenged and ultimately approved 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 processes and reports are used and embedded in the first line of defence.

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

### AMERICAN INTERNATIONAL GROUP UK LIMITED

#### Risk Management Overview, Strategy and Objectives

AIG UK believes that a strong, effective and embedded Risk Management Framework is crucial to maintaining successful business operations and delivering sustainable, long-term profitability. AIG UK 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.

AIG UK utilises the "Three Lines of Defence" model for risk management, as described in Section B.1.A Management and Governance Structure above. Overseeing the AIG UK'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 AIG UK.

AIG UK seeks to maintain a risk profile that meets the following business objectives:

- Deploy its resources in the service of its customers, accepting risks that AIG UK is able to manage;
- Maintain the financial strength to assure its customers, affiliates and distributors AIG UK 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 AIG UK can achieve the greatest long-term risk-adjusted returns;
- Diversify its revenue streams and sources of risk.

AIG UK will assume risks that:

- Are aligned with strategic objectives, growth and/or innovation opportunities in specific markets, or where AIG UK has or can develop a competitive advantage;
- Are well understood by management and where AIG UK 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.

AIG UK will avoid risks that:

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

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

AIG UK's adherence to its quantified risk parameters is supported by ongoing risk identification exercises conducted across the company, the outputs of which are documented within a standing risk register framework, which captures the material risks that AIG UK faces. Identified risks are then managed through the application of a set of policies and procedures which align to AIG's global corporate policies and define risk management processes and controls adopted across our 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 our stress testing programs as well as periodical risk reporting assessments provided to executive risk committees, thereby allowing senior management to take the appropriate decisions required to manage AIG UK as a risk-aware business.

The Board, via the BRC, has ultimate responsibility for development and oversight of the Risk Management Framework; the Board delegates the management of risks within the risk appetite and the risk governance framework to the RCC. The RCC escalates matters of importance to the BRC, and the Board as needed.

### Risk Culture

AIG UK 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. AIG UK defines a framework of risk committees, risk reporting and controls embedded throughout the business. The principal risk committees of the Board and management are designed to support AIG's efforts in embedding a strong risk culture through the integration of risk management with business activities.
- **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. The risk governance framework strives to provide information on the impact of risk management operations and the current risk profile of AIG UK. Without effective communication of AIG UK's risk profile, key stakeholders within the business will not be able to make appropriate decisions required to manage the company as a risk-aware business.
- **Involvement** – appropriate contribution at all levels of management and staff to the processes of identifying, assessing, managing, monitoring and reporting risks. All of the 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 the AIG Group.

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 AIG UK.

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

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 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 AIG UK's Risk Management Framework.

### Risk Identification

AIG UK 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, AIG UK 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.

AIG UK conducts risk identification through a number of methods, including:

- Ongoing assessments of relevant risks in risk committees;
- Identifying growing or emerging risks through conducting risk analysis and follow up monitoring of the annual business plans and its many lines of business;
- 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;
- The assessment of internally and externally generated loss events and Risk and Control Self Assessments (RCSAs);
- Regular stress and scenario exercises are undertaken during the year in co-operation with business operations to evaluate the perils the company is exposed to across multiple facets of the business.

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

### Risk Register

AIG UK 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 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 control risks; these support ExCo risks with enhanced granularity and are designed to mitigate the frequency and/or severity of a given risk. The more effective a key control is, the greater its ability to mitigate the impact of the risk it is linked to. The reverse is also true.

The risks identified at Tier 2 and Tier 3 levels are designed to align to the entity level 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.

This also allows AIG UK 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:



**Tier 1: 10 Key Risks**

The entity level Key Risks are designed to align to the five main risk categories of Insurance, Market, Operational, Credit and Business/Strategy Risk. This allows AIG UK to produce risk dashboards for the RCC, ExCo and BRC covering all of these key risks, as well as a more detailed report for each relevant Risk Committee.

**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 support functions. These ExCo risks are supported by specific tailored Key Risk Indicators for use in committee decision making.

**Risk Management and Control**

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

**Risk reporting and risk indicators**

ERM utilises periodical risk reporting to articulate to regional and local management, including the RCC and the Board, whether AIG UK is identifying, monitoring and managing its risks sufficiently to adequately operate within its risk appetite and to recommend (where appropriate) remedial actions. Our risk reporting and communication framework principally consists of three channels, being Quarterly Risk Assessments, Annual risk documents and ad-hoc reporting.

**Quarterly risk assessments**

The ERM function co-ordinates the production of detailed risk assessments covering key risks for discussion by the Insurance, Market and Operational Risk Committees before being fed up 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 entity level key risks. The assessment of the underlying ExCo risks that comprise each entity level key risk and the results of monitoring conducted on emerging risks is documented in a Risk Watch list. Expert judgement on the part of the individual Heads of Risk for Insurance, Market, Credit and Insurance is applied in conjunction with that of subject matter experts throughout the company to produce these assessments on a quarterly basis.

These assessments utilise a combination of qualitative and quantitative factors, most notably the current calculated risk appetite for each entity level key risk against its defined risk appetite, to grade each of the entity level key risks from low to high risk. These assessments are accompanied by recommendations for further management action to follow.

This reporting format provides to executive management a clear indicator of what the key areas of concern are across the company's risk profile, as well as more detailed engagement with solutions to resolve these concerns, thus enabling them to approve and set these solutions in motion.

**Risk Watch list**

ERM monitors key risks identified from annual review of the Business Plan Risk Review and from ongoing oversight of the risk profile. Once identified and approved, these key risks are reported on a quarterly basis until they have been fully addressed or the exposure to these risks has passed. These risks are formalised within a Risk Watch list, which also includes an overview of monitoring methods and tools used to review these risks on an ongoing basis. Monitoring of these risks may include the use of Key Risk Indicators; these are reported to the RCC and BRC on a quarterly basis as part of ERM's ongoing risk assessment reporting.

### Ad-hoc Reporting

Reporting is also flexible enough to report events outside of the normal reporting cycle and as required ad hoc reports are produced.

### Stress and scenario testing framework

Since the Major Model Change approval by PRA in September 2018, AIG UK 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 SF, the Internal Model is deemed to deliver the true economic view of risk.

Stress and Scenario Testing provides valuable input through informing senior management of how simulated 'real-life' events create pools of risk aggregation across risk types that ultimately impact the capital position. The suite of stress and scenarios tests are utilised in the following areas:

**Internal Model Calibration** - The results of Stress and Scenario Testing are key calibration inputs for two modules of the 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** - The 1 and 3 year baseline forecasts underpinning the Business Plan are set based on a number of "best estimate" predictions including: future loss ratios, GPW growth rate, retention rates.

**Reverse Stress Testing** - AIG UK performs annual Reverse Stress Testing exercises to identify and assess events and circumstances that would cause the business model to become unviable. Reverse Stress Testing allows AIG UK to assess the extreme risks which could threaten AIG UK. Consequently, it ensures early warning indicators can be developed to both mitigate (pre-event) and remediate (post event) management actions.

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

### Solvency Capital Management

Management develop and regularly reassess capital targets and operating ranges in order to ensure AIG UK 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 IM-SCR.

AIG UK targets holding sufficient capital to meet the IM SCR run off to 'ultimate' and withstand various stresses. The IM 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. AIG UK 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.

For the Risk Appetite Framework, AIG UK utilises an alternative economic basis. This basis is still on a 1:200 and One Year view, but unlike Solvency II is with no discounting, on a UK GAAP basis and has no provision for tax loss absorbency. AIG UK 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 clear understanding and quantification of risk (in terms of loss to capital resources) at a given probability. The risk profile is assessed on this basis at the 1:7 and 1:200 loss points.

### 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. 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 risk profile.

### ORSA Governance

AIG UK applies a number of governance processes over the ORSA, in order to ensure that risk management processes and the risk and solvency position of the Company are appropriately defined, assessed and managed.

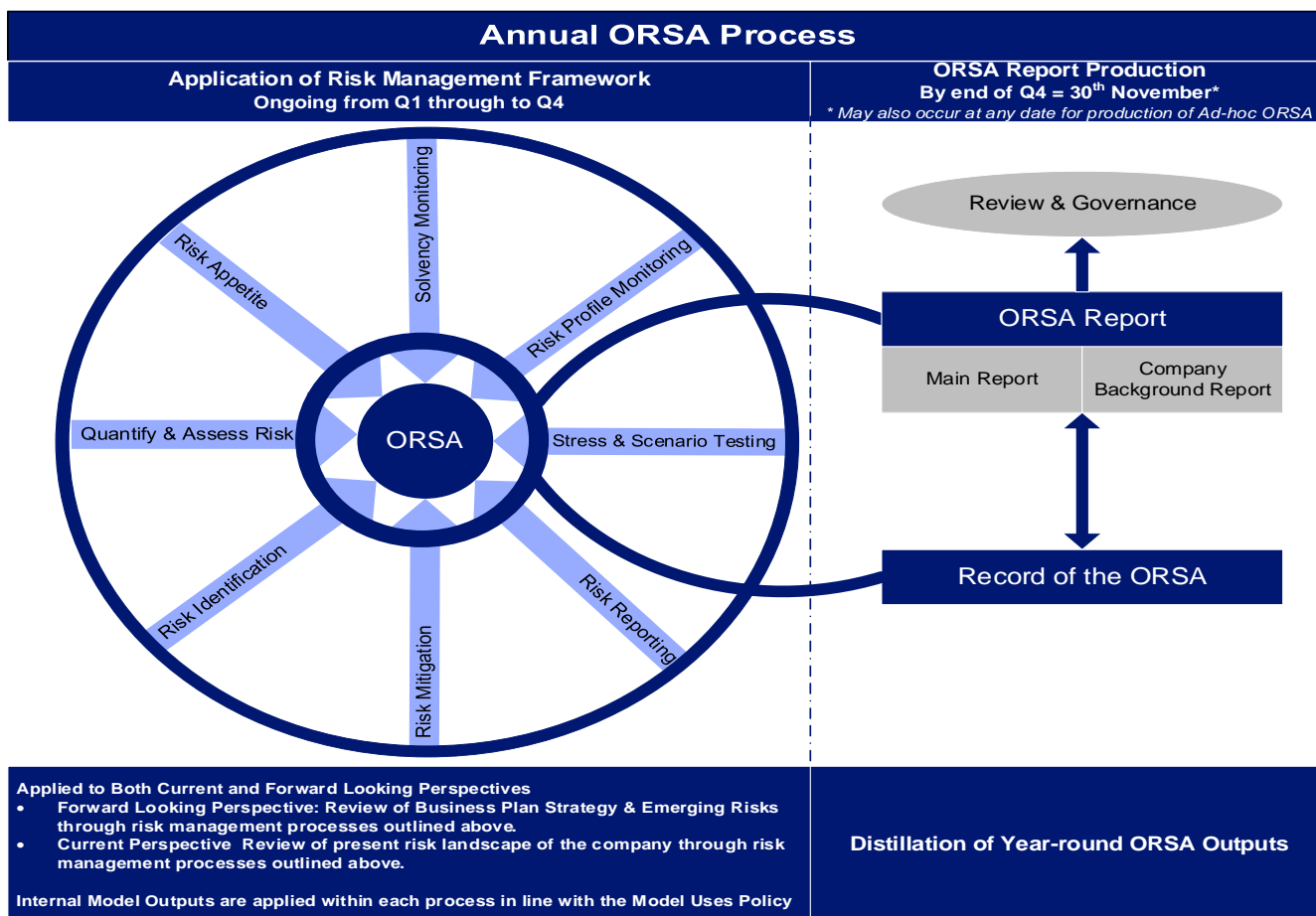
The UK CRO is responsible for conducting centralised risk management activities such as documenting the ORSA Report, maintaining the risk register and producing management information packs for several risk committees.

### ORSA 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 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 approved by the Board. 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 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. The submission of the final ORSA report includes the completion of several key business processes undertaken by 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 RCC, ERM and the Board) and how it fits in with the key business processes:



## B.4 INTERNAL CONTROL SYSTEM

The description of the internal control system is disclosed in Section B.1.A.D Key Functions, Roles and Responsibilities above along with the description on Finance Function.

## B.5 INTERNAL AUDIT FUNCTION

The description of the internal audit function is disclosed in Section B.1.A.D Key Functions, Roles and Responsibilities above within the internal audit function.

## B.6 ACTUARIAL FUNCTION

The description of the actuarial function is disclosed in Section B.1.A.D Key Functions, Roles and Responsibilities above within the actuarial function.

## B.7 OUTSOURCING ARRANGEMENTS

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

AIG UK utilises outsourcing arrangements for a number of operational activities to obtain operational efficiencies, leveraged specialised market skills, and free internal personnel for other key functions.

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. The contract owner is required to ensure adherence to internal policies, procedures and applicable international, regional and local laws and regulations. The process also completes a financial viability assessment based on the third parties current financial and other key operating information, which is either publicly available or provided by the third party.

The contract owners 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 third parties. In addition, other policies and standards are adopted to comply with regional and local laws and regulatory requirements.

A risk rating for each third party is assigned to assure the appropriate oversight is performed and establishes the frequency and mechanism for initial and ongoing oversight. The scope and frequency of ongoing oversight of a third party 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 third party; and
- control issues identified during an assessment.

Risk-based oversight, monitoring and management reporting of third party activities are performed by the contract owner. Each third party must have a contract owner who is responsible for managing the third party. Performance monitoring includes but is not limited to:

- assessing adherence to contracts terms;
- reviewing contract performance and operational issues;
- ensuring that the third party complies with consumer protection laws and regulations;
- reviewing customer complaints about services or products handled by the third party; and
- assessing the adequacy of business recovery and business contingency plans and reporting and monitoring of metrics (e.g., KPIs).

<b>Outsourced Processes</b>	<b>Jurisdictions</b>	<b>Description</b>
Accounts Payable and Finance Centre	India	Administration & fulfilment; Accounts payable, data entry, refunds and billing.
Investment / Asset Management	UK	Investment Management and Operations
Claims Handling	Bulgaria, India	Claims handling and settlement.
Underwriting	India, Malaysia	Non-advised back offices Sales, Underwriting quotation and analytics.
Operations – Policy servicing, Multinational	Philippines, India	Administration & fulfilment; premium collection, data entry, refunds and billing.
HR Shared Services	Malaysia	Administration & Payroll
Treasury Operations	Ireland	Treasury Operations, Bank Administration
IT Services	India, Philippines, US	IT support

## **B.8 ANY OTHER MATERIAL INFORMATION**

As at 30 November 2022, there is no other material information regarding the System of Governance of the Company.



# Solvency & Financial Condition Report 2022

## 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.

## RISK PROFILE

A strong, effective and embedded Risk Management Framework is crucial to maintaining successful business operations and delivering sustainable, long-term profitability. The 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 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 SCRs.

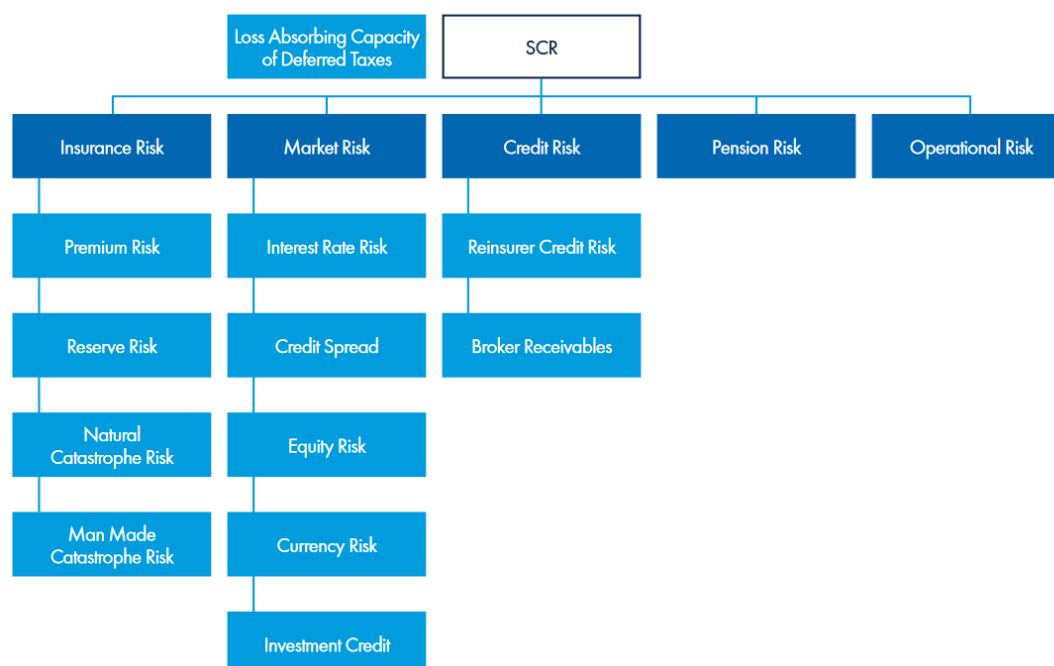
AHEL SCR (unaudited)	AHEL	AIG Israel	Group SCR
£'m	Y/E 2022	Y/E 2022	Y/E 2022
Insurance risk	951.6	158.1	1,109.7
Market risk	467.2	43.1	510.3
Credit risk	151.8	23.1	175.0
Operational risk	212.9	11.8	224.7
Pension risk	32.0	-	32.0
Loss Absorbing capacity of deferred taxes	-	(8.9)	(8.9)
Diversification	(523.4)	(84.2)	(607.6)
Total SCR	1,292.2	143.0	1,435.2

A Major Model Change application made in 2021 was approved by the PRA on 31 January 2022. This was for the change in the risk profile following the purchase of an Adverse Development Cover (ADC) reinsurance contract which provides cover against prior year development.

An application for a Major Model Change was submitted to the PRA on 11 November 2022. This is for a change to the Model Change Policy and will have no quantitative impact to AIG. As the approval date for this will be post 30 November 2022, AHEL and AIG UK are bound to report against the reporting view of the SCR prior to the Major Model Change application. As such, the reported SCR does not reflect model changes up to the year-end 2022 which provided further reductions in the SCR.

AIG Israel Standard Formula (SF) calculations are performed at 2022-Q3 for the AHEL YEAR-END 2022 capital calculation as AIG Israel has a 31 December 2022 year-end reporting date.

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





## Risk Profile, Measurement and Assessment

The Risk Management Framework supports the identification, measurement, management, monitoring and reporting of the five major risk groupings, including:

- Insurance Risk;
- Market Risk including Liquidity Risk;
- Credit Risk;
- Operational Risk including Technology Risk;
- Business and Strategy Risk.

The Risk Profile is a point in time measurement of the risks that AHEL is exposed to. The 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.

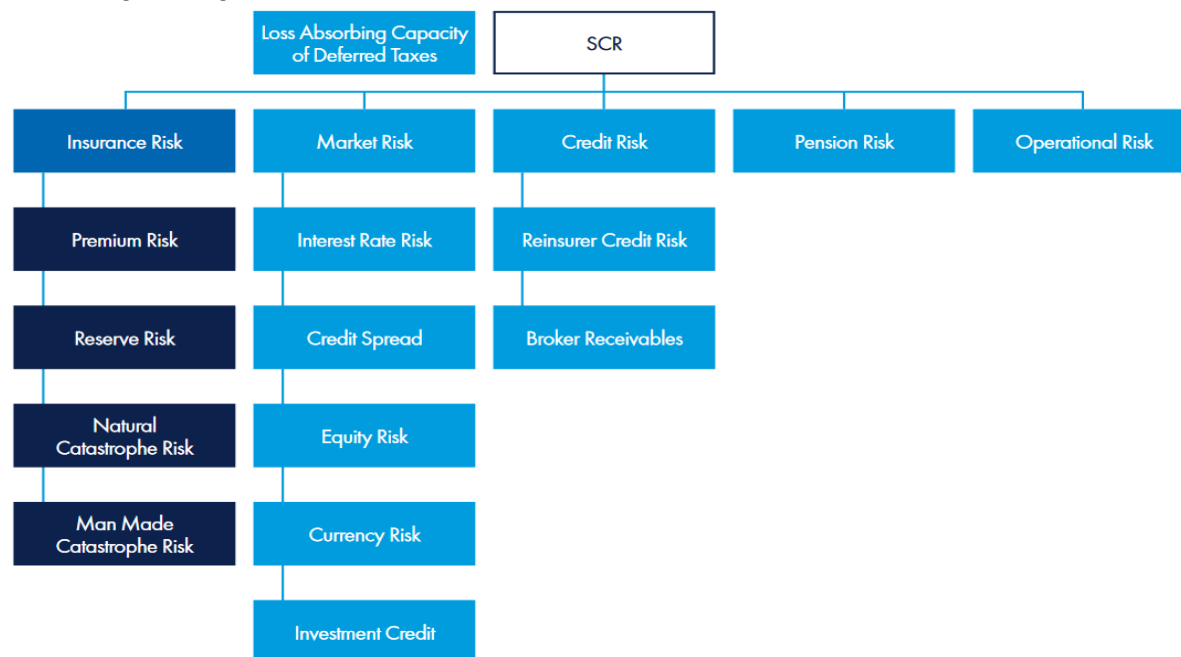
AHEL has identified a number of risks that may potentially impact on the successful execution of its business plan and ability to generate sustainable profits during 2022 and beyond.

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

<b>Risk Area</b>		<b>Description</b>
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	Operational Risk - Loss due to insufficient capability of staff resources (include Health and Wellbeing - failure to provide safe environment to employees)
Business and Strategy Risk	10	Business and Strategy Risk - implementation of business plans and strategies

## C.1 Insurance Risk (Underwriting Risk)

Insurance Risk encompasses the risks AIG UK 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

AHEL 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 potential aggregate losses caused by human activities including; pandemics, terrorism, financial crisis and latent diseases.

AHEL's exposure to Insurance Risks is the largest contributor to its capital requirement.

### MEASURES USED TO ASSESS INSURANCE RISK

#### Premium Risk (Non-Cat)

The modelling of separate capped and excess losses allows AHEL 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 centres, with guidance on techniques and tools from the ECM team. This ensures alignment with the pricing and reserving process.

#### Premium Risk (Natural Catastrophes)

ECM 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 to form a curve which includes the 1-in-200-year return period loss estimate.

Insurance claims arising from scenarios such as; pandemics 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 historical 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 reserves to obtain a range of potential reserve outcomes. The method that we use looks to model 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 ECM team.

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 to qualitative assess the risks described in the previous section:

<b>Insurance Risk Components</b>	<b>Key Risk Indicators (KRIs)</b>
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	This KRI measures the prior year development in the reserves as a percentage of reserves held on a quarterly basis
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 2022.

**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 related to potential natural catastrophe losses with the highest risks monitored through KRI's on a net 1 in 200 Occurrence Exceedance Probability (OEP) basis. The largest concentration is a large flood event in the UK.

## INSURANCE RISK MITIGATION TECHNIQUES

AHEL 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 charged 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:

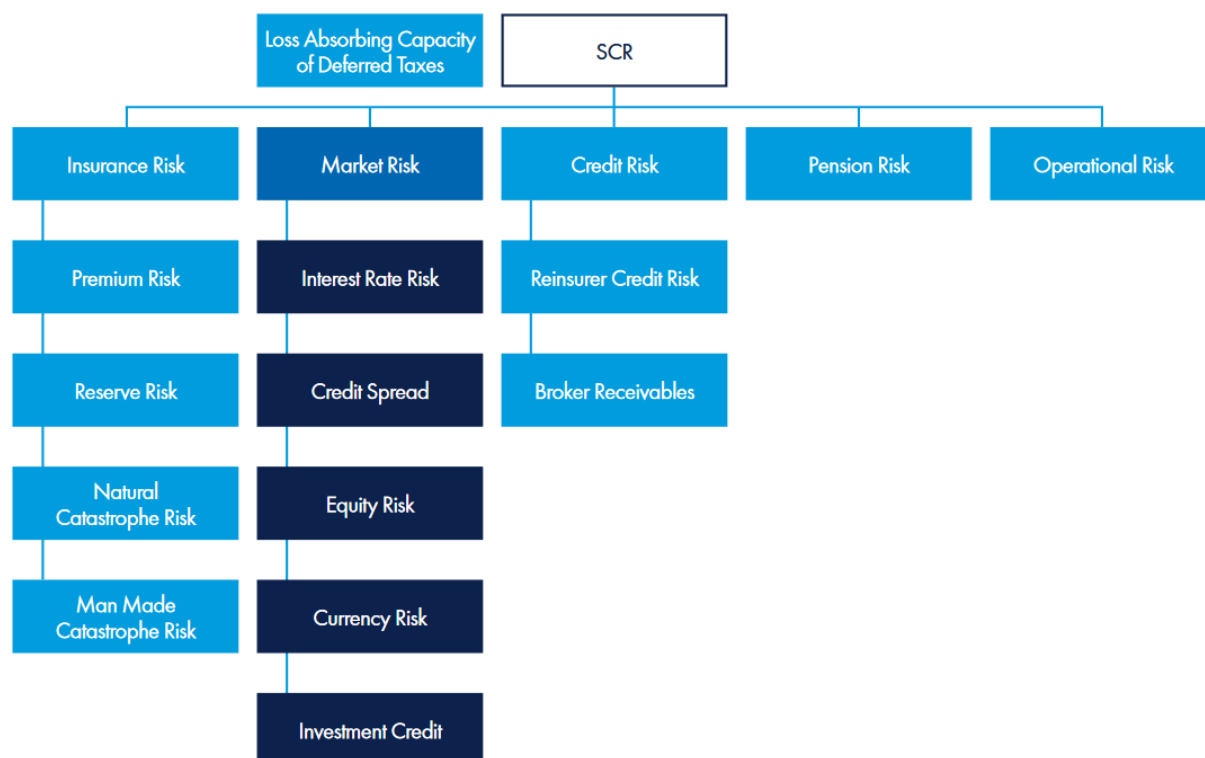
Type of risk / Risk Title	Risk mitigation techniques
<b>Premium Risk - Failure of pricing</b>	
Pricing guidelines	The Company seeks to manage pricing risk through the setting and review of pricing guidelines relevant to each business line and the application of a strict hierarchy of underwriting authorities 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 AIG UK's Insurance Risk Committee for consideration from a Statement of Financial Position, liquidity and portfolio point of view before AIG UK becomes committed.
Purchase of reinsurance	AHEL 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	AHEL 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	AHEL 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	AHEL seeks to manage this risk through monitoring adherence to established policies and procedures in place governing claims reserving practices.
Quarterly Reserve Reviews	AHEL seeks to manage this risk through quarterly reserve reviews of the book to determine appropriate IBNR levels and reviews of expected reserve adequacy
<b>Catastrophe Risk - Failure to manage risk aggregation / accumulation</b>	
Realistic Disaster Scenarios (RDS)	AHEL regularly runs RDS to determine whether aggregate exposures are being adequately managed within the parameters of approved business plans for each line of business.
Use of pre-bind rules and authorities	AHEL seeks to manage this risk through the use of pre-bind rules and authorities to manage significant within line and crossline exposures.
Review of large and unusual transactions	Large and unusual transactions are referred to the AIG UK 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 ORSA.

In relation to Reserve Risk, as described above, the Actuarial Team conducts quarterly reserve reviews of the overall book to determine appropriate reserve levels and quarterly reviews of the expected IBNR adequacy. External consultants are also employed to perform reviews of its reserves to provide an independent review of their adequacy.

## C.2 MARKET RISK



Market risk is the risk that AHEL 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.

AHEL 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 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 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 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 an increase in the value of 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 exposure to Equity risk is immaterial because holdings in underlying equity securities are not significant.
Investment Credit Risk	In the process of holding investment assets to pay claims and meet future liabilities AHEL 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 to link Market Risk and other risk types.

The Internal Model's modelling of the change to the Solvency II balance sheet of Market Risk is captured through the following areas:

- Valuation of invested assets;
- Valuation of derivative instruments;
- Discounting of liabilities;
- Insurance risk outcomes (i.e. inflation driving larger claims); and
- 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, Investment Credit risk is included within the Market Risk sub-module. Investment Credit Risk is included to provide governance alignment between risk and reward where representatives from AIG investments, through the Market Risk Framework, can influence both the Market Risk and Investment Credit Risk profiles.

The following Key Risk Indicators (KRI) and Early Warning Indicators (EWI) are used to quantitatively 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 60bps for an index of single A rated bonds over a quarter will trigger a review of the solvency of the entity.
Interest rate risk	1Y and 5Y Swaptions implied volatility to assess market sentiment in interest rates.
Currency Risk	FX exposure is monitored on a quarterly basis and the MRC is informed of the exposure when thresholds (2% and 5% of target capital) measured with a 1 year 99.5% VaR are breached.

There are no material changes to the measures used to assess market risk during the year 2022.

## MARKET RISK CONCENTRATION

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

AHEL 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 82% (Bonds only table) were either rated AAA, AA or A in 2022.

#### Total investments including cash and other asset holdings

Asset Ratings	Market Risk Concentration £m	Market Risk Concentration %
AAA	1,451	25%
AA	1,059	18%
A	1,507	26%
BBB	424	7%
BB	84	1%
B	129	2%
CCC	17	0%
Not Rated	1,055	18%
<b>Total</b>	<b>5,725</b>	<b>100%</b>

Source: QRT S.06.02.02

The not rated assets are mainly constituted of cash/term deposits, loans, Israeli bonds, and a holding in an equity real estate fund

**Bonds Only**

<b>Asset Ratings</b>	<b>Market Risk Concentration £m</b>	<b>Market Risk Concentration %</b>
AAA	1,438	30%
AA	1,009	21%
A	1,507	31%
BBB	424	9%
BB	69	1%
B	60	1%
Not Rated	286	6%
<b>Total</b>	<b>4,793</b>	<b>100%</b>

Source: QRT S.06.02.04

**MARKET RISK CONCENTRATION – BY ISSUER**

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

<b>Issuer names</b>	<b>Market Risk Concentration £m</b>	<b>Market Risk Concentration %</b>
United States Treasury	529	9%
UK Government	202	4%
European Investment Bank	160	3%
International Bank for Reconstruction & Development - IBRD	111	2%
State of Israel	107	2%

Source: QRT S.06.02.04

The largest exposures above are from national governments and the European Investment Bank, which is part of the EU, therefore the associated market risks are considered to be low.

**MARKET RISK CONCENTRATION – BY CURRENCY**

AHEL have large asset exposures to US Dollars (USD) and GB Pounds Sterling (GBP). The split of excess of assets by major currencies is as follows:

Currency	Market Risk Concentration £m	Market Risk Concentration %
USD	2,745	48%
GBP	2,147	37%
ILS	456	8%
Other	378	7%
<b>Total</b>	<b>5,725</b>	<b>100%</b>

Source: QRT S.06.02.04 List of Assets - Total Solvency II Amount

**MARKET RISK MITIGATION TECHNIQUES**

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

The principal controls that support the management of Market Risk:

- Monitoring adherence to established set of investment guidelines, which are reviewed and updated periodically by the Market Risk Committee. The guidelines contain restrictions on areas such as asset class concentrations, business sector concentrations, the duration of investments against our insurance liabilities, the level of assets held with single obligors with a credit rating lower than AAA and the overall average credit rating target of the investment portfolio.
- The AIG UK Treasury Department reviews, assesses and, if necessary, takes action on foreign exchange rate movements, in conjunction with ERM and the Finance department.
- Performing an annual Strategic Asset Allocation (SAA) exercise to define an Annual Investment Plan for AIG UK that is within its Market Risk Appetite. Execution of the SAA is monitored against the Investment Plan and the Market Risk Appetite on a weekly basis.

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

The scope and magnitude of the market risk exposures are 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 Risk Appetite. Firm-wide limits have been established on the consolidated interest rate, FX, credit spreads, equity and residential and commercial real estate exposures.

Each of the Boards of the subsidiary companies either as a whole or through its committees oversees market risk and approves annually the Risk Appetite Framework which includes the risk appetite for market risk.

The AIG UK Board 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 CFO, is a subcommittee of the RCC. The primary purpose of the MRC is to monitor and manage the Market Risk profile against the Board approved Risk Appetite. The MRC regularly reviews the latest market risk developments and requests more precision when needed.

**RISK MITIGATION AND THE PRUDENT PERSON PRINCIPLE**

AHEL's UK subsidiaries' investment management policies ensure that their 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, AIG UK's investment management framework sets out its SAA that is approved by the AIG UK Board and is reviewed annually.

Asset categories that are included in the SAA are those that are suitable for the liabilities profile by nature, term and currency and for which BlackRock could assess, monitor and control risks. AIG UK does not invest in any asset categories that are not included in the SAA.

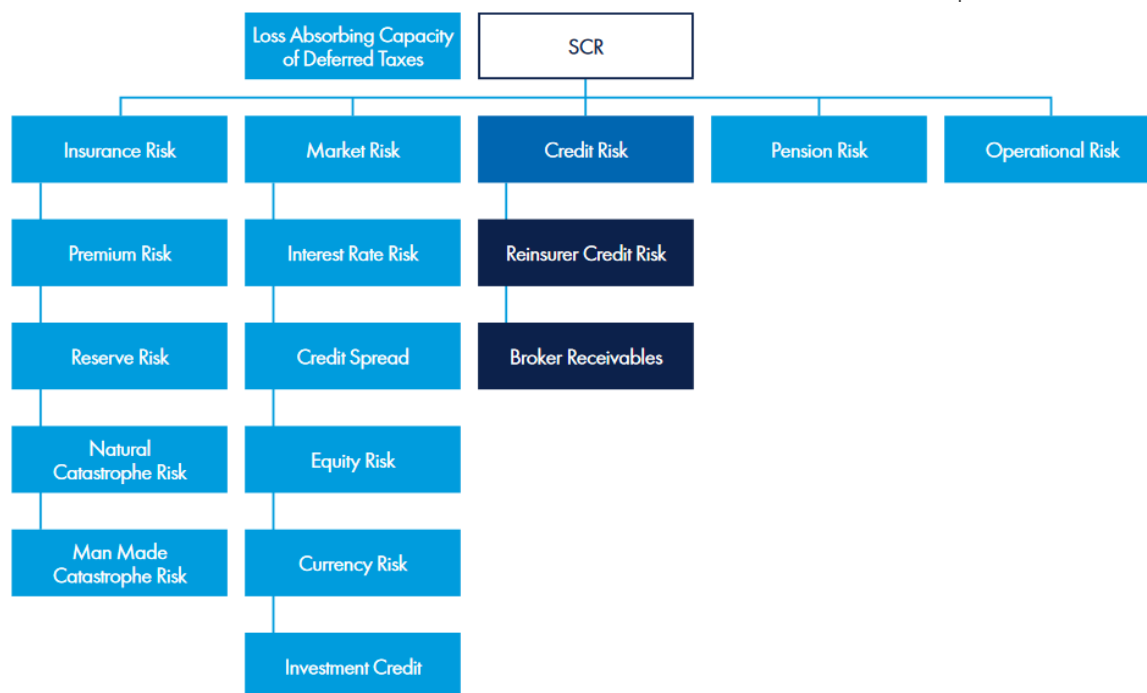
Tactical deviations from the SAA to maximise investment returns are permitted but they are limited to changes in allocation of asset categories covered by the SAA only. AIG UK rebalances its portfolio on a quarterly basis so that the actual allocation of assets is not materially different from the SAA. The SAA implemented by IMA sets out the limits to avoid concentration of risks to a particular sector, issuer, currency, credit rating and country. AIG UK 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 can be incurred from a variety of activities in the investment, financial services and insurance businesses.

### MEASURES USED TO ASSESS CREDIT RISK

The Internal Model allows the explicit modelling of default and exposure to both reinsurance and broker counterparties. AHEL 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 AHEL to assess the credit risk:

KRIs	Description
Unexpected Credit Loss owing to Reinsurer failure	AHEL faces a risk of material losses if its main reinsurers fail or are unable to pay their contractual share of claims payable. AHEL'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 counterparties including group)	AHEL 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 2022.

### 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 core operations. It may arise either in the form of single name concentration or industry concentration.

AHEL's most material Credit Risk concentration relates to reinsurance arrangements. Details of the top five external (to the AHEL Group) reinsurer balances including those held with captive reinsurers are shown below, with the largest reinsurance balance with AIG Global Reinsurance Operations.

Reinsurer Name	£m
AIG GLOBAL REINSURANCE OPERATIONS	376
NATIONAL UNION FIRE INSURANCE CO. OF PITTSBURGH	327
LEXINGTON INSURANCE CO.	156
MUNICH REINSURANCE COMPANY	152
HSBC INSURANCE (BERMUDA) LTD	120

Source: S.31.01 QRT

It should be noted that the combined exposure from reinsurers, which belong to American International Group, Inc., is £1,026m.

### CREDIT RISK MITIGATION TECHNIQUES

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

AHEL monitors and controls its subsidiary-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, AHEL may require third-party guarantees, reinsurance or collateral, such as letters of credit and trust collateral accounts. AHEL treats these as credit exposures and includes them in its risk concentration exposure data. AHEL 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 CCO through techniques listed below:

- Aggregating 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 applicable Large and Unusual Transactions Referral Group for its consideration; and
- Overseeing the Watch List process within the portfolios.

AIG's reinsurance planning is closely aligned with Group approach which seeks to reduce exposure through a lowering of net retention and managing volatility. The choice of individual reinsurer and the associate risk appetite is closely controlled by Group and AIG is expected to adhere to global risk framework. The key elements and requirements of which may be summarised as follows:

- External reinsurers to have an A- rating or better. There may be instances where a reinsurer could have a rating less than A- (for instance compulsory cessions), although these represent exceptional cases and will be subject to specific approval by the Global Reinsurance Credit risk team.
- Non-rated intercompany Reinsurance should be collateralised.
- Credit and Operational risk related to reinsurance will be controlled by the adoption of global Reinsurance Standards.

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

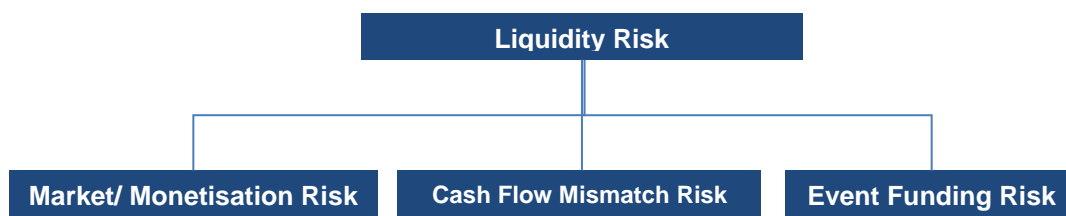
The creation and maintenance of a strong internal control framework is essential and is required to identify, evaluate, risk rate, measure, manage and govern credit risk across the enterprise and to ensure the consistency of those processes.

To this end, an effective credit Risk Management Framework has been established, which dovetails with AIG UK's Credit Policy and Procedures, intended to achieve that objective by defining guidelines and establishing credit risk processes to govern day-to-day credit risk-taking activities. The CCO and credit executives are primarily responsible for implementing and maintaining a Risk Management Framework consistent with the AIG UK Credit Policy, and the AIG UK Credit Procedures.

## C.4 LIQUIDITY RISK

Liquidity refers to the ability to generate sufficient cash resources to meet the payment obligations. It is defined as unencumbered cash and assets that can be monetised 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 financial condition will be adversely affected by the inability or perceived inability to meet 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

The following sources of liquidity and funding risks could impact AHEL's ability to meet short-term financial obligations as they come due:

- **Market/Monetisation 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.

### MEASURES USED TO ASSESS LIQUIDITY RISK

The Treasury and ERM have developed "Standard Metrics" on the 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 2022.

### LIQUIDITY RISK CONCENTRATIONS

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

Being predominantly a non-life insurer AIG UK 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 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

Liquidity Risk is managed by ensuring there is a sufficient surplus of unencumbered capital and diversity of funding sources available to meet actual and contingent liabilities during both normal and stressed periods. It is mitigated through investment in predominately liquid financial assets and constant monitoring of expected asset and liability maturities.

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

AHEL 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 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 Liquidity Management Policy prescribes procedures to maintain sufficient liquidity to meet the obligations as they become due. Within the liquidity management policy, risk tolerance levels are established for baseline and adverse scenarios over a one-year time horizon, which are designed to ensure that funding needs are met under varying market conditions. Liquidity risk is managed through a framework that is designed for the measurement and monitoring of AIG UK's Liquidity Risks, which includes the following key controls:

- Reviews of Liquidity Risk Management Reports provided by the Treasury function, as well as review and approval of stress scenarios designed by ERM to assess liquidity risk in extreme situations.
- Management of short-term cash coverage ratios and long-term asset coverage ratios within the limits defined by ERM. ERM also independently sets which assets are to be considered as available liquidity and which hair-cuts should be considered in case asset sales are required.
- Treasury is operationally responsible for ensuring that sufficient funding required for a stressed scenario is available based on the defined stress scenarios and limits, and that the sources of funding are appropriately diversified.
- Maintenance of a Contingent Funding Plan, which is triggered in the event of breaches in Liquidity Risk limits.

### **EXPECTED PROFIT INCLUDED IN FUTURE PREMIUMS (EPIFP)**

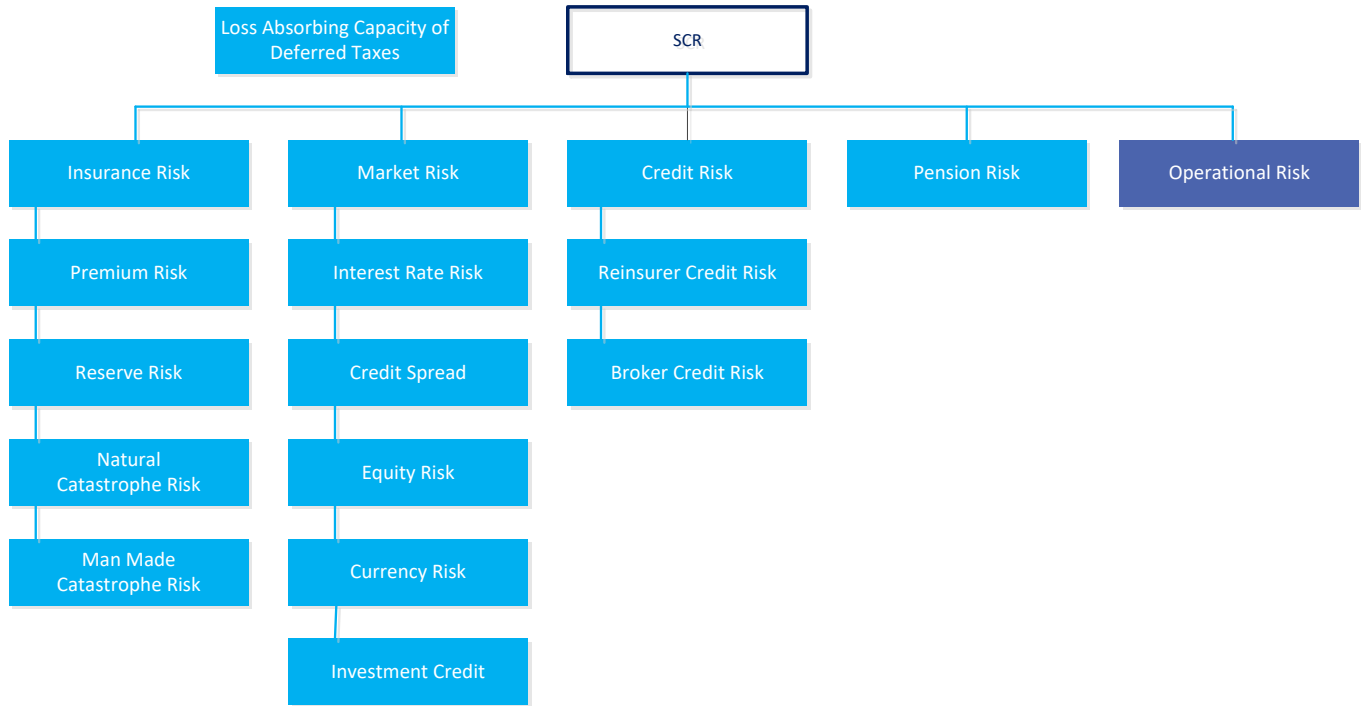
EPIFP is presented in QRT.23.01.22 'Own Funds'. EPIFP are profits arising from the inclusion in the technical provisions on existing business that will be received in the future but have not yet been received.

The total EPIFP for AHEL is £353.4m. This is made up of £81.8m for Life business and £271.5m for Non-Life business.

## 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. The definition of Operational Risk includes legal risk and the impact from business and strategy risks.

Operational Risk is considered a key risk area 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

Exposure to Operational Risks is the third largest risk type. Exposure is to the following types of Operational risk:

Operational Risk Components	Description
IT system disruptions	IT systems or applications fail or do not perform reliably
Outsourcing and Third party performance and engagement	Third party capabilities and SLAs do not match business requirements and expose AIG UK to unintended risk. Errors and delays in the on-boarding of new vendors and business partners
Legal & Regulatory risk	Local insurance rules & regulations. Economic sanctions: Inability to comply with economic sanctions
Financial reporting misstatements	This is the risk of financial statements containing material misstatements / or errors in financial reporting accounting and includes late filing of accounts or errors in tax accounting.
Claims	The risk of inadequate handling of claims by the company resulting in claims leakage or inappropriate denials.
People Risk	Loss due to insufficient capability of staff resources (including the failure to provide a safe working environment to employees)
Fraud	Risk of loss due to fraud perpetrated internally or externally.
Administration execution	Execution administration errors in policy servicing (timelines, incorrect data, communication breakdowns) leading to customer detriment, reputational, financial and operational impacts.
Cyber	Information theft & denial of service. Hackers break into AIG systems to steal customer information or proprietary AIG information or make systems incapable of functioning properly.

Operational Risk Components	Description
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	Ineffective business continuity: Risk of ineffective BCP strategy and plan on threats and risks facing AIG due to natural disasters, political events, accidents or physical damage that disrupts business continuity.
Data	The risk that required data is not sufficiently available or of high enough quality 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).

### 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 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 to assess Operational Risk:

Operational Risk Components	Metrics
IT system disruptions	Outage Systems and Outage Duration Report
Outsourcing and Third party performance and engagement	Risk Events, Category Based Risk Assessment (CBRA) Report
Legal & Regulatory risk	Number of Privacy Risk Incidents / Escalations
Financial reporting misstatements	Late Filings Report
Claims	Closed file reviews, Declined Ratios, Complaints Claim Handling Report
People Risk	Headcount Report
Fraud	Number of internal fraud cases, Gross loss from internal fraud
Administration execution	SLA Report, Operations Report
Cyber	Number of attacks, Malware detected
Reinsurance	Bound not booked report, Internal Treaty, External Treaty, Facultative / Captive spend
Receivables	Open Receivables Report
Business continuity	Business Impact Analysis / Business Continuity Plan Assessment Report
Data	Data Quality and Availability Report
Conduct risk	Complaint Management Report

There are no material changes to the measures used to assess Operational Risk during the year 2022.

## OPERATIONAL RISK CONCENTRATION

When viewed on a standalone basis, the largest Operational Risks AHEL 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

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

AIG Group's ORM Framework, to which the AHEL subsidiaries aligns, 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.

AHEL and its subsidiaries have no appetite for operational risks related to regulatory breaches and internal fraud. However, other operational risks (including conduct risk) are expected to be incurred in the course of conducting business, such as inadvertent errors that may occur in day-to-day operations. AHEL's subsidiaries strive to reduce the probability and impact of operational risks as much as reasonably practicable while maintaining the ability to conduct a viable business.

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

ORM reviews all risk events reported and communicates 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 entities. 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 Internal Model and it leads to a comprehensive review and refresh of key scenarios and the library of key Operational Risks, aligning this to a global top-down risk assessment.

## RISK SENSITIVITIES

Various tests to identify the implications of a wide range of risks within the Stress and Scenario Testing (SST) Framework are conducted.

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.

SST (including Reverse Stress Testing) is a key risk management tool used within the Company alongside the ECM. Reverse stress tests are conducted on an annual basis that examines the conditions that would render the business model unviable.

The details of various SSTs are as follows:

Types of SSTs	Risks covered	Timeline
Model Calibration	Man-Made Catastrophe – Realistic Disaster Scenarios	Performed annually
	Operational Risks and Scenarios	Performed annually
Model Validation	All material risk areas	Performed annually
Business Plan SST	All material risks over 1-year planning period	Performed annually
	All material risks over 3-year planning period	
Reverse Stress Testing (RST)	Solvency/Capital RSTs	Performed annually
	Liquidity RSTs	
	Reputational & Strategic RSTs	
Risk Specific SST	Liquidity Risks	Performed monthly
	Securitisation Stress Testing	Performed quarterly
Regulatory SST	PRA General Insurance Stress Test (GIST)	Performed every two years
Strategic planning SSTs	All Risks	As required
Emerging Risks SSTs	All Risks	As required

### STRESS TESTS AND SENSITIVITIES

In order to monitor the impact of sensitivity of material risks and events on AIG UK's risk profile and SII Surplus, AIG UK has performed the following stress tests.

These tests quantify the potential impact on the Solvency II ratio of a wide range of shocks reflecting historical stress events.

These do not take into account pre-emptive management actions that might be taken to mitigate the effects of the defined shocks, nor indicate a probability of occurrence. The sensitivities are forward looking.

The table below provides a ranking of the stresses based on the lowest Solvency Ratio over the business planning horizon.

Stress	2023				2022			
	Rank	Lowest Solvency Ratio (Forecast)	Largest SR Delta from Baseline	Largest Solvency Impact £m	Rank	Lowest Solvency Ratio (Forecast)	Largest SR Delta from Baseline	Largest Solvency Impact £m
<b>Baseline</b>		161%	0%	0		150%	0%	0
Stagflation; Interest Rate Decrease; Credit Spread Shock	1	135%	-35%	453	New for 2023			
Persistent Inflation	2	140%	-30%	422	New for 2023			
Large Losses and PYD	3	142%	-26%	374	1	129%	-19%	266
Transient Inflation 2 (reverts to 1-2% above expected)	4	143%	-25%	355	New for 2023			
Transient Inflation 1 (reverts to expected level)	5	146%	-21%	291	New for 2023			
European Windstorm	6	153%	-7%	97	5	140%	-8%	102
Large Multi-Line event	7	154%	-10%	113	6	141%	-8%	102
UK Flood	8	154%	-7%	85	7	141%	-7%	93
Interest Rate Decrease, Credit Spread Shock	9	158%	-16%	158	2	131%	-18%	221
Cyber	10	159%	-3%	35	9	145%	-3%	40
Credit Spread & Equity Shock	11	161%	-7%	100	4	135%	-14%	181
Interest Rate Decrease Shock	12	162%	-13%	117	8	143%	-7%	66
Interest Rate Increase Shock	13	165%	2%	-8	10	150%	1%	-13



## C.6 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. The defined benefit scheme is now self-funded on a technical provisions basis with plans in place to incentivise members of this now-closed scheme to move to an alternative plan. Pension risk is explicitly modelled within the Company's Internal Model.

### Technology Risk

Stable, reliable, and updated systems are important to underpin the successful execution of the 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.

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 Internal Model as part of Operational Risk.

### Business and Strategy Risk

Business and Strategy Risk is regarded as taking a number of forms, the most common of which are as follows:

#### Strategic Risk

This represents the risk of losses due to the inability to implement appropriate business plans and strategies, make decisions, allocate resources, or adapt to changes in the business environment. The risks include general macro-economic pressures, misalignment of AHEL's objectives to those of AIG Inc., as well as risks associated with one off business specific events such as significant mergers and acquisitions. Key controls in the management of Strategic Risk are as follows:

- A business planning process is applied that incorporates all material facets of the business to produce AHEL's one- and five-year business plans and strategy over the year and ensure that it has a sustainable strategy that is aligned to global objectives. Senior executives and the board participate in this process, including review and approval of the final business plan strategy.
- Controls are in place to monitor performance against budget target and adherence to strategic objectives.
- ERM produces risk assessments of profit centres for the year to come, as well as conducting scenario analysis and stress testing on the one- and five-year budgets.

#### Capital Adequacy Risk

Capital Adequacy Risk covers the risk of not maintaining the capital levels required to meet both regulatory and rating agency standards and the impacts of breaches in these capital requirements. Intra-group transactions such as dividend payments to the AIG Group parent and ceding insurance risk to internal counterparties also plays a part in influencing and being affected by Capital Adequacy Risk. Key controls in the management of Capital Adequacy Risk are as follows:

- Application of and adherence to a clearly defined capital management policy, which requires that AHEL maintains a target capital buffer above its set minimum capital level.
- An annual Capital Management Plan is delivered which articulates the strategy for maintaining capital held over a five year period to meet regulatory and rating agency requirements as well as meeting dividend payments to the AIG Group parent. The Capital Management Team also conducts monitoring of capital levels and takes appropriate action in accordance with the Capital Management Plan.
- Capital support agreements such as Capital Maintenance Agreements (CMAs) are utilised with the ultimate parent, which defines actions to be taken by the parent in the event of AHEL breaching its local regulatory capital requirement.

#### Reputational Risk (Including Group Reputational Risk)

This covers the risk that adverse publicity regarding business practices and associations, whether accurate or not, will cause a loss of confidence in the integrity of AIG Group, including AHEL and AIG UK. As a large insurer with business operations around the globe, AIG is exposed to reputational risks which have the potential to impact company standing with customers, investors, business partners and regulators, all of which could crystallize in costs to AHEL or AIG UK. Key controls in the management of Reputational Risk are as follows:

- Application of and adherence to policies to control exposure to scenarios that could damage the AIG brand or the immediate reputation as a company.
- Activities (such as potential mergers and acquisitions, significant investments, and material changes in operations) that carry material reputational risk are subjected to additional levels of governance, including that provided by the executive and board level risk committees.
- Applying forward looking stresses covering aspects of reputational risk to identify potential impacts and management actions arising from these.
- Maintaining close contact with AIG Group regarding the development and execution of strategy which may impact upon or the perception of AHEL or AIG UK by its customers.

### Climate Risk

AIG supports the scientific consensus that climate change is a reality of increasing global concern. Climate change, indicated by higher concentrations of greenhouse gases, a warming atmosphere and ocean, diminished snow and ice, and sea level rise, appears to have contributed to unpredictability, increase in the frequency and severity of natural disasters, and the creation of uncertainty as to future trends and exposures. As such, climate change potentially poses serious financial implications for the insurance industry in areas such as underwriting, claims and investments.

Climate Change has become an increasing priority for public and private sector organisations across the globe. The UN, EU, UK, and other leading nations are now taking a keen interest in addressing the Climate Change agenda and this has been driven at a supranational level by the United Nations Climate Change Conference (COP) and enhanced by the United Nations Climate Change Agreement, 2015 (Paris Agreement).

**AIG 2050 Net Zero Commitments**

AIG has established a clear direction of travel in regard to Environmental, Social and Governance (ESG) issues. As an important step along this journey, AIG has committed to reaching Net Zero GHG emissions across its underwriting and investment portfolios by 2050 or sooner, as set out in AIG’s 2021 ESG Report.

These commitments include phasing out business and investments significantly associated with coal-fired power, thermal coal mines or oil sands, by 2030. Underwriting excellence is a key pillar of our business strategy, and a key aspect of underwriting excellence includes integrating ESG considerations into our underwriting practices to inform decision making and help ensure our underwriting is aligned with our other ESG efforts.

**Regulatory Requirement**

In April 2019, the PRA issued Supervisory Statement SS3/19: Enhancing banks’ and insurers’ approaches to managing the financial risks from climate change. This sets out how the regulator expects firms to address the financial risks from climate change as part of their governance arrangements, existing risk management practices, scenario analysis and disclosures. This remains the core document outlining the UK regulator’s requirements relating to Climate Risk. Key expectations from the Supervisory Statement are as follows:

**Governance**

- Board to understand and assess financial risks from climate change that affect the firm and address these within the business strategy and risk appetite.
- Evidence how the firm monitors and manages the financial risks from climate change in line with its risk appetite statement.
- Ensure clear roles and responsibilities for the board and relevant sub-committees in managing the financial risks from climate change.

**Risk Management**

- Firms to address the financial risks from climate change through their existing Risk Management frameworks.
- Firms to understand the financial risks from climate change and how they will affect their business model.
- Firms to consider a range of tools and metrics to monitor exposure to financial risks from climate change.
- Firms are expected to evidence how they will mitigate these financial risks.

**Scenario Analysis**

- Firms to conduct scenario analysis to inform strategic planning and determine the impact of climate change on overall risk profile/business strategy.
- Scenario analysis is to address a range of outcomes relating to different transition paths to a low-carbon economy, and a path where no transition occurs.
- Scenarios are to be used to understand the impact from these risks on their solvency, liquidity, and ability to pay policyholders.
- ORSA is considered to be a useful framework to consider the financial risks from climate change.

**Disclosure**

- Firms are expected to disclose information on material risks within Pillar 3 disclosures.
- Firms should consider if further disclosures are necessary to enhance transparency on the approach to managing financial risks from climate change.
- Firms are expected to develop and maintain an appropriate approach to disclosure.
- Firms are expected to engage with wider initiatives on climate-related financial disclosures to allow for the benefits of disclosures that are comparable across firms.

On 21<sup>st</sup> October 2022 the UK PRA issued its ‘Dear CEO’ letter on “Thematic feedback on the PRA’s supervision of climate-related financial risk and the Bank of England’s Climate Biennial Exploratory Scenario exercise”, following the PRA’s first year of active supervision of firms’ management of climate-related financial risk. The letter provided a summary of capabilities which the PRA expects firms to be able to demonstrate, and consolidated feedback to the market based on the 2021 CBES exercise.

**AIG UK**

**Summary of Climate Risk Plan**

The Climate Plan, which is made available to the PRA, sets out how AIG UK will continue to meet the above regulatory expectations in respect of managing climate-related financial risk. The delivery of AIG’s Net Zero Commitment sets a clear intended outcome for the Climate Plan and describes the activities for AIG UK’s Underwriting and Investment functions required to embed these commitments across the business.

**Senior Management Function Role**

The PRA expects to see evidence that there is a Senior Management Function (SMF) role that provides effective oversight of risk management and controls and also expects the board to ensure that adequate resources are devoted to managing the financial risks from climate change.

The Chief Risk Officer was appointed to the SMF role by the AIG UK Board in 2021. The SMF provides effective oversight of risk management and controls and also expects the board to ensure that adequate resources are devoted to managing the financial risks from climate change.

**Stress testing: 2021 CBES**

AIG UK participated in the Bank of England’s 2021 CBES: Climate Biennial Exploratory Scenario. CBES included multiple scenarios covering climate- as well as macro- variables, with a time horizon up to 30 years. The aim of the exercise was to size the potential risks from climate

change, and for firms to consider management actions they would take in response. The quantitative results were supported by a detailed qualitative questionnaire. On 9 February 2022 the Bank launched round 2 of CBES, which focused on management responses to the scenarios and resulting challenges to participants' business models.

### **AIG Inc. Environmental, Social and Governance Report**

In 2022, AIG published its second Environmental, Social and Governance (ESG) Report.

AIG will set the standard for how the risk management industry can successfully move into a future which contains greater risks, but also greater potential. We expect our ESG focus to evolve as we engage with key stakeholders and identify emerging ESG topics, trends, risks, and opportunities; and as AIG evolves as a business.

### **Environmental**

As a global risk management company playing a crucial role in finding viable pathways to a net zero future, it is essential for AIG and the clients we serve that we continuously adapt to and embrace the latest science and technology regarding pathways to a net zero future. We will achieve this by drawing upon our data and expert insights to create well-defined goals and by holding ourselves accountable as we pursue these objectives.

In March 2022, we announced a commitment to reach net zero greenhouse gas (GHG) emissions across our underwriting and investment portfolios by 2050, or sooner, which complements our existing commitment regarding our own operations. This report provides additional details about the actions associated with our net zero commitments and AIG's use of science-based targets to meet the goals of the Paris Agreement.

Insurance is an essential part of the global economy because insurance allows households and businesses to take on more intelligent and informed risks. Understanding our role as an insurer and influencer of risk management practices, we have developed an ESG underwriting framework that defines our company-wide approach for consistently integrating ESG across all product lines. As such, we have implemented a dynamic and comprehensive methodology that informs how we approach and manage climate risk.

We have also undertaken significant efforts, to support the market's transition to a more sustainable and resilient economy by insuring renewable energy and lower-carbon industries. Recognizing that the energy transition will be a challenge, especially to less-resourced economies, AIG participates in the Sustainable Markets Initiative Insurance Taskforce. Our involvement included participation in the development of the Sustainable Products and Services Showcase to support green innovation across multiple sectors and geographies. Through these efforts, as well as our community-focused partnerships, we hope to lead the way in developing tools and frameworks that assess and address climate risk.

### **Social**

Social encompasses a broad range of efforts which demonstrate how AIG is contributing to building a more inclusive and sustainable economy that better serves the needs of all stakeholders. AIG embraces diversity, equity and inclusion in everything we do; from the way we uphold human rights, to how we attract, retain and develop our talent, to the support we provide our communities and the products and services we offer our clients.

Our three career-development and diversity leadership programs, Accelerated Leadership Development Program, Executive Men's Development Initiative and Women's Executive Leadership Initiative, as well as our Early Career program, are avenues by which we are developing our pipeline of diverse senior leaders to advance at AIG.

These programs provide additional development, mentoring, networking opportunities and training to AIG's most promising females and under-represented talent. In 2021, we also launched the Signature Series: Recruiting for Success diversity recruitment training program to develop diverse slates of candidates and to be more inclusive in our hiring practices. Through our Supplier Diversity program, AIG awarded more than \$60 million of business to certified diverse suppliers and organizations in 2021.

We have enhanced our disclosure on workforce composition, attraction, and retention, with detailed information on our diversity profile. Global gender representation improved across all employee categories with women representing 55% of our global workforce. More than 50% of all hires and promotions in 2021 were women and our voluntary turnover rate among women is lower than men. Representation of Asian, Black, and Latino talent improved across Executive and Senior Management levels in the U.S. by 2 percentage points.

Our Wellness at AIG program is aimed at destigmatizing mental health and providing our colleagues with resources to support their mental health. In 2021, AIG provided our global colleagues with two paid Wellness Days off to focus on their wellbeing.

### **Governance**

AIG is committed to a robust set of effective governance policies and practices that are designed to set clear expectations and hold the company accountable to high standards of oversight, integrity and ethics while delivering long-term financial growth and value creation.

Governance actions detailed in this report include our efforts to engage with government and regulatory officials to shape and understand evolving climate change policy frameworks, our continued advocacy for open, rules-based and sustainable trade through our Global Trade Series, and the incorporation of Culture of Integrity and Risk Management goals into annual performance goals for all managers.

Governance is also an area where we work with our clients to ensure best practices, including cybersecurity and data privacy, which are essential to risk mitigation.

For further information please refer to AIG's ESG Report: <https://www.aig.com/esgreports/home>



# Solvency & Financial Condition Report 2022

## D. Valuation for Solvency Purposes

THE 'VALUATION FOR SOLVENCY PURPOSES' SECTION OF THE REPORT DESCRIBES THE VALUATION OF ASSETS, TECHNICAL PROVISIONS AND OTHER LIABILITIES UNDER UK GAAP AND SOLVENCY II. THE SECTION ALSO OUTLINES THE APPROACH AND METHODOLOGY UNDERLYING THE VALUATION.

**KEY ELEMENTS IN THE SECTION ARE:**

- D.1 Assets;
- D.2 Technical Provisions (TPs)
- D.3 Other Liabilities

## VALUATION FOR SOLVENCY PURPOSES

## AIG HOLDINGS EUROPE LIMITED

The "Valuation for Solvency Purposes" section states the principles and bases applied by AHEL in preparing the Solvency II economic balance sheet (EBS). AHEL's Solvency II balance sheet has been prepared using the default accounting consolidation method (Method 1).

AHEL's subsidiaries consist of largely insurance undertakings and service providing entities. Whilst AHEL and the majority of its subsidiaries have a 30 November financial period end, its subsidiary AIG Israel has non-coterminous period end at 31 December. At 30 November 2022, AHEL has consolidated AIG Israel's EBS as at year-ended 30 September 2022.

From a UK GAAP perspective, AHEL has taken advantage of section 401 of the Companies Act 2006, which exempts an intermediate parent company to prepare consolidated financial statements if it is included in the consolidated financial statements of a larger group drawn up in a manner equivalent to consolidated.

Therefore, AHEL standalone financial statements contain UK GAAP financial information related to AHEL as an individual company and do not contain consolidated financial information of a group.

## Solvency II Consolidated Balance Sheet as at 30 November 2022

	Notes	Standalone AHEL UK GAAP £'m	Consolidated EBS YE 2022 £'m	Consolidated EBS YE 2021 £'m
<b>Assets</b>				
Deferred acquisition costs	9	-	-	-
Intangible assets	10	-	-	-
Deferred tax assets	8	-	125.2	78.1
Pension benefit surplus	11	-	23.8	32.0
<b>Property, plant &amp; equipment held for own use</b>	<b>7</b>	<b>-</b>	<b>104.9</b>	<b>105.2</b>
<b>Investments</b>	<b>D.1</b>	<b>2,340.0</b>	<b>5,050.4</b>	<b>4,914.8</b>
Property (other than for own use)		-	-	-
Participations		2,340.0	35.9	35.3
Equities		-	-	-
Equities - listed		-	-	-
Equities - unlisted		-	-	-
Bonds		-	4,794.0	4,847.1
Government Bonds		-	1,808.6	1,673.6
Corporate Bonds		-	2,943.4	3,129.6
Structured notes		-	-	-
Collateralised securities		-	42.1	43.8
Investment funds		-	28.6	25.9
Derivatives		-	-	-
Deposits other than cash equivalents		-	191.9	6.5
Other Investments		-	-	-
<b>Loans &amp; mortgages</b>	<b>2</b>	<b>4.5</b>	<b>399.8</b>	<b>372.3</b>
Loans and mortgages to individuals		-	0.1	0.1
Other loans & mortgages		4.5	399.7	372.2
Loans on policies		-	-	-
<b>Reinsurance recoverable from:</b>	<b>D.2</b>	<b>-</b>	<b>1,539.5</b>	<b>1,689.3</b>
Non-life excluding health	13	-	1,533.6	1,677.1
Health similar to non-life	13	-	0.6	6.0
Health similar to Life	13	-	3.7	4.5
Life excluding Health and index-linked and unit-linked	13	-	1.7	1.7
Insurance & intermediaries receivables	4	-	42.2	14.2
Reinsurance receivables	5	-	525.5	216.1
Receivables (trade, not insurance)	3	4.3	176.2	437.8
Cash and cash equivalents	6	0.3	170.5	206.5
<b>Total assets</b>		<b>2,349.1</b>	<b>8,157.8</b>	<b>8,066.3</b>

Solvency II Consolidated Balance Sheet as at 30 November 2022	Notes	Standalone AHEL UK GAAP £'m	Consolidated EBS YE 2022 £'m	Consolidated EBS YE 2021 £'m
<b>Liabilities</b>				
<b>Technical Provisions</b>				
	D.2			
Technical provisions – non-life	13	-	(5,501.8)	(5,447.7)
Non-life excluding health	13	-	(5,450.9)	(5,397.2)
Health similar to non-life	13	-	(50.9)	(50.5)
Technical provisions – life	13	-	(38.4)	(44.1)
<b>Liabilities other than Technical Provisions</b>				
	D.3			
Provisions other than technical provisions	15	-	(33.4)	(10.7)
Pension benefit obligations		-	-	-
Deposits from reinsurers	18	-	(66.5)	(68.8)
Deferred tax liabilities	17	-	(14.0)	(22.4)
Derivatives		-	-	-
Debts owed to credit institutions		-	-	-
Insurance & intermediaries payables	19	-	(3.0)	(2.2)
Reinsurance payables	20	-	(9.5)	(5.4)
Payables (trade, not insurance)	14	(0.3)	(426.3)	(513.5)
Subordinated liabilities	16	-	-	-
Subordinated liabilities not in BOF		-	-	-
Subordinated liabilities in BOF		-	-	-
<b>Total Liabilities</b>		<b>(0.3)</b>	<b>(6,093.0)</b>	<b>(6,114.7)</b>
<b>Excess of Assets over Liabilities</b>		<b>2,348.8</b>	<b>2,064.8</b>	<b>1,951.6</b>

## AMERICAN INTERNATIONAL GROUP UK LIMITED

The following tables set out assets and liabilities as reported by AIG UK and adjusted for presentational and reclassification items to align AHEL's UK GAAP balance sheet to the prescribed format of the Solvency II balance sheet Quantitative Reporting Template (QRT).

Solvency II Balance Sheet as at 30 November 2022	Notes	UK GAAP YE 2022 £'m	Solvency II Reclassification YE 2022 £'m	Solvency II Adjustment YE 2022 £'m	Solvency II EBS YE 2022 £'m	Solvency II EBS YE 2021 £'m
<b>Assets</b>						
Goodwill	12	2.3	-	(2.3)	-	-
Deferred acquisition costs	9	165.0	-	(165.0)	-	-
Intangible assets	10	8.1	-	(8.1)	-	-
Deferred tax assets	8	101.6	-	17.1	118.7	77.0
Pension benefit surplus	11	23.8	-	-	23.8	32.0
Property, plant & equipment held for own use	7	96.0	-	-	96.0	101.9
<b>Investments</b>	1	4,577.7	36.2	28.7	4,642.6	4,478.7
Property (other than for own use)		-	-	-	-	-
Participations		19.0	35.5	28.7	83.2	81.7
Equities		-	-	-	-	-
Equities - listed		-	-	-	-	-
Equities - unlisted		-	-	-	-	-
<b>Bonds</b>		4,367.1	36.1	(41.1)	4,362.2	4,390.4
Government Bonds		4,367.1	8.8	(2,699.5)	1,676.4	1,514.1
Corporate Bonds		-	27.0	2,616.7	2,643.7	2,832.5
Structured notes		-	-	-	-	-
Collateralised securities		-	0.3	41.7	42.1	43.8
Investment funds		-	(35.5)	41.1	5.6	0.3
Deposits other than cash equivalents		191.6	-	-	191.7	6.3
<b>Loans &amp; mortgages</b>	2	344.6	1.7	(5.5)	340.8	291.0
Other loans & mortgages		344.6	1.7	(5.5)	340.8	291.0
<b>Reinsurance recoverable from:</b>	D.2	2,494.0	-	(1,117.5)	1,376.5	1,521.4
Non-life excluding health	13	2,494.0	-	(1,122.7)	1,371.2	1,509.3
Health similar to non-life	13	-	-	0.6	0.6	6.0
Life excluding Health and index-linked and unit-linked	13	-	-	4.7	4.7	6.1
Insurance & intermediaries receivables	4	1,038.2	-	(1,002.1)	36.1	13.6
Reinsurance receivables	5	525.2	-	-	525.2	215.9
Receivables (trade, not insurance)	3	199.2	(37.9)	-	161.4	403.9
Cash and cash equivalents	6	140.9	-	-	140.9	187.0
<b>Total assets</b>		9,716.7	-	(2,254.8)	7,461.9	7,322.4

Solvency II Balance Sheet as at 30 November 2022	Notes	UK GAAP YE 2022 £'m	Solvency II Reclassification YE 2022 £'m	Solvency II Adjustment YE 2022 £'m	Solvency II EBS YE 2022 £'m	Solvency II EBS YE 2021 £'m
<b>Liabilities</b>						
<b>Technical Provisions</b> D.2						
Technical provisions – non-life	13	(6,464.4)	-	1,373.4	(5,091.0)	(5,014.5)
Non-life excluding health	13	(6,464.4)	-	1,422.3	(5,042.1)	(5,014.5)
Health similar to non-life	13	-	-	(48.8)	(48.8)	(48.8)
Technical provisions – life	13	-	-	(73.7)	(73.7)	(106.3)
<b>Liabilities other than Technical</b>						
<b>Provisions</b> D.3						
Provisions other than technical provisions	15	(33.4)	-	-	(33.4)	(10.7)
Pension benefit obligations		-	-	-	-	-
Deposits from reinsurers	18	(7.0)	-	-	(7.0)	(6.0)
Deferred tax liabilities	17	-	-	(4.5)	(4.5)	-
Insurance & intermediaries payables	19	(139.3)	-	139.3	-	-
Reinsurance payables	20	(811.2)	-	811.2	-	-
Payables (trade, not insurance)	14	(408.4)	-	-	(408.4)	(468.6)
Subordinated liabilities	16	-	-	-	-	-
Subordinated liabilities not in BOF		-	-	-	-	-
Subordinated liabilities in BOF		-	-	-	-	-
<b>Total Liabilities</b>		<b>(7,863.7)</b>	<b>-</b>	<b>2,245.7</b>	<b>(5,618.0)</b>	<b>(5,654.9)</b>
<b>Excess of Assets over Liabilities</b>		<b>1,853.0</b>	<b>-</b>	<b>(9.1)</b>	<b>1,843.9</b>	<b>1,667.5</b>



## D.1 ASSETS

### (Note D1) D.1 INVESTMENTS (OTHER THAN ASSETS HELD FOR INDEX-LINKED AND UNIT-LINKED CONTRACTS)

AHEL investments are valued in accordance with Article 75 of the Solvency II Directive. Under the Directive, assets are fair valued at arm's length basis between knowledgeable and willing parties, and liabilities valued at the amount for which they could be transferred at arm's length basis between knowledgeable and willing parties.

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.

AHEL's participations represent non-controlling interest in subsidiaries which are stated at cost less impairment in UK GAAP. 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.

AHEL's investments comprise the following categories:

- Participations
- Equities
- Bonds (including Government Bonds, Corporate Bonds, Structured Products and Collateralised Securities)
- Collective Investment Undertakings (Investment Funds)
- Derivatives
- Deposits other than cash equivalents

The table below shows the split of AHEL's total investments between AIG UK and other component entities.

The consolidation adjustment of £2,103.8m serves to eliminate the net assets of AHEL's and AIG UK's subsidiaries which are fully consolidated on a line-by-line basis.

#### AHEL

	Bonds	Deposits other than cash equivalents	Investment Funds	Participations	Total
	£'m	£'m	£'m	£'m	£'m
AHEL Solo	-	-	-	2,056.1	2,056.1
AIG UK	4,362.2	191.7	5.6	83.2	4,642.6
Other Subsidiaries	431.8	0.2	23.0	0.4	455.5
Consolidation Adjustments	-	-	-	(2,103.8)	(2,103.8)
<b>AHEL Consolidated</b>	<b>4,794.0</b>	<b>191.9</b>	<b>28.6</b>	<b>35.9</b>	<b>5,050.4</b>

#### AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 1: Investments (Other than assets held for index linked and unit linked contracts)	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Participations	19.0	35.5	28.7	83.2	35.5
Bonds	4,367.1	36.1	(41.1)	4,362.2	4,794.4
Investment funds	-	(35.5)	41.1	5.6	28.6
Deposits other than cash equivalents	191.6	-	-	191.7	191.9
<b>Balance as at 30 November 2022</b>	<b>4,577.7</b>	<b>36.2</b>	<b>28.7</b>	<b>4,642.6</b>	<b>5,050.4</b>

**(Note 2) LOANS AND MORTGAGES**

Loans and mortgages are measured at amortised cost under 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.

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

**AHEL**

The table below shows the split of AHEL's loans and mortgages between AIG UK and other component entities.

Loans and Mortgages	£'m
AHEL Solo	6.3
AIG UK	340.8
Other Subsidiaries	52.7
Consolidation Adjustment	-
<b>AHEL Consolidated</b>	<b>399.8</b>

AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 2: Loans and Mortgages	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	344.6	1.7	(5.5)	340.8	399.8

**(Note 3) RECEIVABLES (TRADE, NOT INSURANCE)**

**AHEL**

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 UK GAAP is taken to approximate fair valuation.

The table below shows the split of AHEL's trade receivables between AIG UK and other component entities.

The difference between UK GAAP and Solvency II arises as insurance receivables which are not past due under UK GAAP are treated as future cash flows and reclassified to technical provisions under Solvency II.

Receivables (Trade, Not Insurance)	£'m
AHEL Solo	2.5
AIG UK	161.4
Other Subsidiaries	146.6
Consolidation Adjustment	(134.3)
<b>AHEL Consolidated</b>	<b>176.2</b>

The consolidation adjustment of (£134.3m) represents the elimination of intragroup trade balances.

AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 3: Receivables (trade, not insurance)	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	199.2	(37.9)	-	161.4	176.2

**(Note 4&5) INSURANCE & INTERMEDIARY RECEIVABLES & REINSURANCE RECEIVABLES**

AHEL

(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).

AHEL's (re)insurance receivables are all due within 12 months. Owing to their short term nature, the amortised cost valuation under UK GAAP 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 reclassification in insurance and intermediaries receivables relates to the amounts that are not past due under UK GAAP treated as future cash flows and included in technical provisions under Solvency II

The table below shows the split of AHEL's (re)insurance receivables between AIG UK and other component entities.

Insurance and Intermediaries Receivables	£'m
AIG UK	36.1
Other Subsidiaries	6.1
Consolidation Adjustment	-
<b>AHEL Consolidated</b>	<b>42.2</b>

Reinsurance Receivables	£'m
AIG UK	525.2
Other Subsidiaries	0.2
<b>AHEL Consolidated</b>	<b>525.5</b>

AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 4: Insurance and Intermediaries Receivables	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	1,038.2	-	(1,002.1)	36.1	42.2

Note 5: Reinsurance Receivables	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	525.2	-	-	525.2	525.5

**(Note 6) CASH AND CASH EQUIVALENTS**

AHEL

The table below shows the split of AHEL's cash and cash equivalents between AIG UK and other component entities.

Cash and Cash Equivalents	£'m
AHEL Solo	0.3
AIG UK	140.9
Other Subsidiaries	29.3
<b>AHEL Consolidated</b>	<b>170.5</b>

AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 6: Cash and Cash Equivalents	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	140.9	-	-	140.9	170.5

**(Note 7) PROPERTY, PLANT & EQUIPMENT HELD FOR OWN USE**

## AHEL Group

The revaluation model is applied to the measurement of property both under UK GAAP and Solvency II.

Under the UK GAAP 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. AHEL'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 Accounting Standard (IAS) 38.

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 AHEL's property, plant and equipment between AIG UK and other component entities.

Property, Plant and Equipment Held for Own Use	£'m
AIG UK	96.0
Other Subsidiaries	8.9
<b>AHEL Consolidated</b>	<b>104.9</b>

## AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 7: Property, Plant & Equipment	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	96.0	-	-	96.0	104.9

**(Note 8) DEFERRED TAX ASSET**

## AHEL

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.

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 AHEL's deferred tax assets between AIG UK and other component entities.

Deferred Tax Assets	£'m
AIG UK	118.7
Other Subsidiaries	6.5
<b>AHEL Consolidated</b>	<b>125.2</b>

## AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 8: Deferred Tax Asset	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	101.6	-	17.1	118.7	125.2

**(Note 9) DEFERRED ACQUISITION COST**

## AHEL

Under UK GAAP, 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).

## AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 9: Deferred Acquisition Costs	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	165.0	-	(165.0)	-	-

**(Note 10) INTANGIBLE ASSETS****AHEL**

AHEL's intangible assets include capitalised software costs and acquired brands. Under UK GAAP, 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 November 2022, none of AHEL's intangible assets met this criterion therefore the whole amount was written off.

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

Note 10: Intangible Assets	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	8.1	-	(8.1)	-	-

**(Note 11) PENSION BENEFIT SURPLUS****AHEL**

AHEL's subsidiaries operate a number of pension schemes; whose members receive benefits on either a defined benefit or defined contribution basis. Under UK GAAP, 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 November 2022, the pension benefit surplus reported by AHEL related to AIG UK.

Pension Benefit Surplus	£'m
AIG UK	23.8
<b>AHEL Consolidated</b>	<b>23.8</b>

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

Note 11: Pension Benefit Surplus	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	23.8	-	-	23.8	23.8

**(Note 12) Goodwill****AIGUK**

AIGUK's goodwill relates to AIGUK's acquisition of assets and liabilities in Hospital Plan Insurance Services ("HPIS") and HPIS Limited ("HPIS Ltd") in March 2021. It represents the difference between acquisition costs and net assets of HPIS and HPIS Ltd.

Under Solvency II, goodwill is valued at zero unless they can be sold separately, and their values can be derived using quoted prices in active markets. Hence, the whole amount was written off.

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

Note 12: Goodwill	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	2.3	-	(2.3)	-	-

## D.2 TECHNICAL PROVISIONS

### (Note D2) 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:

- 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.

### AMERICAN INTERNATIONAL GROUP UK LIMITED

Solvency II requires Technical Provisions to be segmented by Solvency II lines of business. The segmentation of lines of business is more granular and is dependent on a 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 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 the PRA 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.

### VALUATION BASIS, METHODS AND MAIN ASSUMPTIONS

Currently the PRA 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 AHEL level, the consolidated best estimate of technical provisions is calculated as the sum of Solvency II Best estimates of AIG UK, and AIG Israel. Where there are intra- group reinsurance contracts, the following adjustments have been made:

The best estimate of the undertakings that accept 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 November 2022.

AHEL's Risk Margin is the sum of solo Risk Margins for AIG UK and AIG Israel.

**Notes to Economic Balance Sheet**

**AHEL**

There have been no material changes in the assumptions used to calculate the Solvency II technical provisions. AHEL's Technical Provisions are categorised as:

- Non-life Excluding Health is the largest category of technical provisions and it relates to the following SII LoBs:
  - D. General Liability (AIG UK and AIG Israel)
  - E. Motor Vehicle Liability (AIG UK and AIG Israel)
  - F. Fire and Other Damage to Property (AIG UK and AIG Israel)
  - G. Other Motor Insurance (AIG UK and AIG Israel)
  - H. Marine, Aviation and Transport (AIG UK)
  - I. Credit and Suretyship (AIG UK)
  - J. Miscellaneous Financial Loss (AIG UK)
- Health Similar to Non-life Techniques (Health NSLT) is the second largest category of technical provisions of AHEL's and it relates to the following SII LoBs:
  - Medical Expense (AIG UK and AIG Israel)
  - Income Protection (AIG UK and AIG Israel)
- Life excluding health, unit-linked and index-linked relates to following SII Lines of Business:
  - Other Life Insurance that represents life protection products (AIG Israel)
  - 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 AIG UK
- Health Similar to Life Techniques (Health SLT) relates to critical illness and income protection products of 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.

(Note 13) Technical Provisions - AHEL

Note 13: Technical provisions	Non-life excluding Health £'m	Health Similar to Non-life Techniques (Health NSLT) £'m	Non-life Total £'m	Life excluding health, index-linked and unit-linked £'m	Health Similar to Life Techniques (HSLT) £'m	Life Total £'m
Best estimate	(4,950.1)	(40.4)	(4,990.5)	(36.2)	20.7	(15.6)
Risk Margin (unaudited)	(500.8)	(10.5)	(511.2)	(17.2)	(5.7)	(22.9)
<b>Gross Technical Provision</b>	<b>(5,450.9)</b>	<b>(50.9)</b>	<b>(5,501.8)</b>	<b>(53.4)</b>	<b>15.0</b>	<b>(38.4)</b>
Reinsurance Recoverable	1,533.6	0.6	1,534.1	1.7	3.7	5.4
<b>Net Technical Provision</b>	<b>(3,917.3)</b>	<b>(50.4)</b>	<b>(3,967.7)</b>	<b>(51.7)</b>	<b>18.6</b>	<b>(33.0)</b>

Source AHEL QRT S.02.01

(Note 13) Technical Provisions - AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 13: Technical provisions	Non-life excluding Health £'m	Health Similar to Life Techniques (HSLT) £'m	Total non-Life £'m	Life excluding health, index linked and unit Linked £'m
Best Estimate	(4,558.1)	(39.1)	(4,597.2)	(64.8)
Risk Margin (unaudited)	(484.0)	(9.8)	(493.8)	(8.9)
<b>Gross Technical Provision</b>	<b>(5,042.1)</b>	<b>(48.9)</b>	<b>(5,091.0)</b>	<b>(73.7)</b>
Reinsurance Recoverable	1,371.2	0.6	1,371.8	4.7
<b>Net Technical Provision</b>	<b>(3,670.9)</b>	<b>(48.3)</b>	<b>(3,719.2)</b>	<b>(69.1)</b>

AMERICAN INTERNATIONAL GROUP UK LIMITED

**GROSS CLAIMS PROVISIONS**

The following adjustments are applied to the UK GAAP reserves (with no margin for prudence) to derive the gross claims provision:

- Expenses.
- Events Not in Data (ENID).
- Discounting credit.
- Reinsurance recoveries (less bad debt).
- Any segmentation required to complete the calculations.

The UK GAAP 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 AIG UK's 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 AIG UK 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, commission and claims are allowed for in the calculation and profit from BBNI acts to reduce the best estimate Technical Provisions.

**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 UK GAAP 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 UK GAAP 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, which mirrors the UK GAAP best estimate reserving process.

The risk-free yield curves (with no volatility adjustment and matching adjustment) provided by the PRA 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 AIG UK also need to be considered.

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 UK GAAP reserves and ceded UEPR respectively used as the start point in the calculation.

To determine the UK GAAP 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

AIG UK currently adopts the principle of correspondence in its treatment of all reinsurance, for both current and future reinsurance contracts. Within AIG UK, 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 which takes 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 UK GAAP 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 (Unaudited)

Methodology 1, prescribed by EIOPA's Guideline 62, is used to calculate the future 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 99.5th 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 AIG UK'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 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, PPO claims (i.e. propensity/emergence, mortality, ASHE index), abuse and disease claims.

**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.

**Ogden Discount Rate:** There is still uncertainty surrounding the Ogden rate due to the timing and value of any change in discount rate and the decision by the Scottish Parliament to maintain a discount rate of -0.75% which may lead to jurisdiction shopping.

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). We manage model error by using a range of methods rather than relying on a single one which are summarised below:

- 1) Modelling is performed using a variety of different methods including:
  - Chain-ladder;
  - Bornhuetter Fergusson;
  - Frequency/Severity;
  - Cape Cod.
- 2) Modelling is performed on both paid claims and incurred claims. For some lines of business, different large loss modelling approaches are used.
- 3) 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.

#### 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 UK GAAP 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 relating to AIG Inc. 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 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 85% 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 AHEL's Technical Provisions by material SII LoBs is consistent with that of AIG UK. 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 AHEL.

Within AIG UK 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).

## D.3 OTHER LIABILITIES

### (Note 14) PAYABLES (TRADE, NOT INSURANCE)

#### AHEL

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 UK GAAP is taken to approximate fair valuation.

The table below shows the split of AHEL's trade payables between AIG UK and other component entities.

Payables (Trade, Not Insurance)	£'m
AHEL Solo	(0.3)
AIG UK	(408.4)
Other Subsidiaries	(151.8)
Consolidation Adjustment	134.3
<b>AHEL Consolidated</b>	<b>(426.3)</b>

The consolidation adjustment of £134.3m represents the elimination of intragroup trade balances.

#### AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 14: Payables (Trade, Not Insurance)	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	(408.4)	-	-	(408.4)	(426.3)

### (Note 15) PROVISIONS OTHER THAN TECHNICAL PROVISIONS

#### AHEL

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 UK GAAP, 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 UK GAAP.

At 30 November 2022, the amount reported by AHEL for other provisions related to AIG UK.

Provisions Other Than Technical Provisions	£'m
AIG UK	(33.4)
<b>AHEL Consolidated</b>	<b>(33.4)</b>

## AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 15: Provisions Other Than Technical Provisions	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	(33.4)	-	-	(33.4)	(33.4)

**PENSION BENEFIT OBLIGATIONS**

AHEL

There is no pension benefit obligation at 30 November 2022.

**(Note 16) SUBORDINATED LIABILITIES**

AHEL

There are no subordinated liabilities at 30 November 2022.

**(Note 17) DEFERRED TAX LIABILITIES**

AHEL

Refer to Note 8 for the UK GAAP and Solvency II valuation principles in respect of deferred taxes.

The table below shows the split of AHEL's deferred tax liabilities between AIG UK and other component entities.

Deferred Tax Liabilities	£'m
AIG UK	(4.5)
Other Subsidiaries	(9.5)
<b>AHEL Consolidated</b>	<b>(14.0)</b>

## AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 17: Deferred Tax Liabilities	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	-	-	(4.5)	(4.5)	(14.0)

**(Note 18) DEPOSIT FROM REINSURERS**

AHEL

Deposits from reinsurers are measured at amortised cost under UK GAAP. The amortised cost valuation is taken to approximate fair value for Solvency II purposes.

The table below shows the split of AHEL's deposits from reinsurers between AIG UK and other component entities.

Deposits from Reinsurers	£'m
AIG UK	(7.0)
Other Subsidiaries	(59.5)
<b>AHEL Consolidated</b>	<b>(66.5)</b>

## AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 18: Deposit From Reinsurers	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	(7.0)	-	-	(7.0)	(66.5)

**(Notes 19 & 20) INSURANCE AND INTERMEDIARIES PAYABLES & REINSURANCE PAYABLES**

## AHEL

(Re)insurance payables represent the sum of creditors arising out of direct insurance and reinsurance operations. AHEL's (re)insurance payables are all due within 12 months. Owing to their short term nature, the amortised cost valuation under UK GAAP is taken to approximate fair valuation.

The reclassification in (re)insurance payables relates to these balances forming part of the future premium cash flows in "gross premium provisions" component in Solvency II technical provisions.

The table below shows the split of AHEL's (re)insurance payables between AIG UK and other component entities.

Insurance and Intermediaries Payables	£'m
AIG UK	-
Other Subsidiaries	(3.0)
<b>AHEL Consolidated</b>	<b>(3.0)</b>

Reinsurance Payable	£'m
AIG UK	-
Other Subsidiaries	(9.5)
<b>AHEL Consolidated</b>	<b>(9.5)</b>

## AMERICAN INTERNATIONAL GROUP UK LIMITED

Note 19: Insurance and Intermediaries Payables	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	(139.3)	-	139.3	-	(3.0)

Note 20: Reinsurance Payable	AIG UK UK GAAP £'m	AIG UK Reclassification £'m	AIG UK Solvency II Adjustments £'m	AIG UK SII Value £'m	AHEL Consolidated SII Value £'m
Balance as at 30 November 2022	(408.4)	-	-	(408.4)	(9.5)

**D.4 ALTERNATIVE VALUATION METHODS**

## AHEL

The following is a description of the valuation methodologies used for instruments carried at fair value:

**Fixed Maturity Securities**

Whenever available, the Company obtains quoted prices in active markets for identical assets at the financial position date to measure fixed maturity securities at fair value in its available-for-sale portfolios. Market price data is generally obtained from dealer markets.

Management is responsible for the determination of the value of the investments carried at fair value and the supporting methodologies and assumptions. The Company employs independent third-party valuation service providers to gather, analyse and interpret market information, and derive fair values based upon relevant methodologies and assumptions for individual instruments. When the Company's valuation service providers are unable to obtain sufficient market observable information upon which to estimate the fair value for a particular security, fair value is determined either by requesting brokers who are knowledgeable about these securities to provide a quote, which is generally non-binding, or by employing widely accepted internal valuation models.

Valuation service providers typically obtain data about market transactions and other key valuation model inputs from multiple sources and using widely accepted valuation models provide a single fair value measurement for individual securities for which a fair value has been requested under the terms of service agreements. The inputs used by the valuation service providers include, but are not limited to, market prices from recently completed transactions and transactions of comparable securities, benchmark yields, interest rate yield curves, credit spreads, currency rates, quoted prices for similar securities and other market observable information as applicable. The valuation models take into account, among other things, market observable information as of the measurement date as well as the specific attributes of the security being valued including its term, interest rate, credit rating, industry sector, and when applicable, collateral quality and other security or issuer-specific information. When market transactions or other market observable data is limited, the extent to which judgement is applied in determining fair value is greatly increased.

The Company has processes designed to ensure that the values received are accurately recorded, that the data inputs and the valuation techniques utilised are appropriate and consistently applied, and that the assumptions are reasonable and consistent with the objective of determining fair value. The Company assesses the reasonableness of individual security values received from valuation service providers through various analytical techniques. In addition, the Company may validate the reasonableness of fair values by comparing information obtained from the Company's valuation service providers to other third-party valuation sources for selected securities. The Company also validates prices for selected securities obtained from brokers through reviews by members of management who have relevant expertise and who are independent of those charged with executing investing transactions.

The methodology described above is relevant for all fixed maturity securities. The following paragraphs set out certain procedures unique to specific classes of securities.

#### Fixed Maturity Securities Issued by Government Entities

For most debt securities issued by government entities the Company obtains fair value information from independent third-party valuation service providers, as limited quoted prices in active markets are available for debt securities issued by government entities. The fair values received from these valuation service providers may be based on a market approach using matrix pricing, which considers a security's relationship to other securities for which a quoted price in an active market may be available, or alternatively based on an income approach which uses valuation techniques to convert future cash flows to a single present value amount.

#### Fixed Maturity Securities Issued by Corporate Entities

For most debt securities issued by corporate entities, the Company obtains fair value information from third-party valuation service providers. For certain corporate debt securities, the Company obtains fair value information from brokers.

#### RMBS/CMBS/CDOs and Other ABS

Third-party valuation service providers also provide fair value information for the majority of the Company's investments in RMBS, CMBS, CDOs and other ABS. Where pricing is not available from valuation service providers, the Company obtains fair value information from brokers. Broker prices may be based on an income approach, which converts expected future cash flows to a single present value amount, with specific consideration of inputs relevant to structured securities, including ratings, collateral types, geographic concentrations, underlying loan vintages, loan delinquencies, and weighted average coupons and maturities. Broker prices may also be based on a market approach that considers recent transactions involving identical or similar securities. When the volume or level of market activity for an investment in RMBS, CMBS, CDOs or other ABS is limited, certain inputs used to determine fair value may not be observable in the market.

#### Equity Securities

Equity securities held by the Company relate to investments in real estate investment funds and are held at fair value. Where the Company acquires any unquoted equities where the Company does not have any significant influence these equity investments will not have a quoted market price in an active market and fair values cannot be reliably measured, therefore these are held at cost in accordance with IAS 39. Currently the Company holds investments in real estate investment funds only.

#### Short Term Investments

Short Term Investments are held at amortised cost in line with their classification as loans and receivables under IAS 39 (opted for under the choice given under FRS 102). Amortised cost is calculated using the effective interest method, which allocates interest income/expense over the relevant period by applying the effective interest rate to the carrying amount of the instrument. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument to the net carrying amount of the financial instrument.

#### Loans Receivables

The Company holds Loans Receivable at amortised cost in line with their classification as loans and receivables under IAS 39 (opted for under the choice given under FRS 102). Amortised cost is calculated using the effective interest method, which allocates interest income/expense over the relevant year by applying the effective interest rate to the carrying amount of the asset. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument to the net carrying amount of the financial instrument.

## D.5 ANY OTHER MATERIAL INFORMATION

#### AHEL

As at 30 November 2022, there is no other material information regarding Valuation for Solvency Purposes.



## Solvency & Financial Condition Report 2022

### E. Capital Management

THE 'CAPITAL MANAGEMENT' SECTION OF THE REPORT DESCRIBES THE INTERNAL OPERATIONAL STRUCTURES/PROCEDURES UNDERLYING CAPITAL MANAGEMENT WITHIN AHEL.

THE CAPITAL PLAN IS UPDATED AT LEAST ANNUALLY OR MORE FREQUENTLY IF A MATERIAL CHANGE OCCURS TO AHEL'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

### APPROACH TO CAPITAL MANAGEMENT

AHEL 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.

### 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 worldwide Group.

The Finance function provides the Board and RCC with information on the AIG UK'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

AHEL'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 AHEL Capital Plan is built.

The AHEL 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 AHEL Capital Plan is updated and approved by the Board annually or more frequently if there are material changes in circumstances.

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;
- AHEL'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 SF views.

### CAPITAL MANAGEMENT PROCESS AND POLICY

#### AHEL

AHEL 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 AHEL to meet regulatory requirements and ensuring capital is available to support strategic plans;
- Optimising AHEL's sources and usage of capital;
- Ensuring any excess capital is returned to AIG Inc. on a timely basis without compromising the other objectives, as above.

#### AMERICAN INTERNATIONAL GROUP UK LIMITED

AIG UK 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. It establishes a formal capital assessment and management framework in order to achieve the following objectives:

- Ensuring adequate capital is maintained to meet regulatory and rating agency requirements and ensuring capital is available to support strategic plans;
- Enabling AIG UK to follow and meet its rating agency strategy and in particular to achieve its target ratings;
- Optimising AIG UK's sources and usage of capital;
- Ensuring that excess capital is returned to AIG Inc. on a timely basis without compromising the other objectives, as above;
- 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.



## E.1 OWN FUNDS

AHEL 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 contingent convertible notes.
- 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

#### AHEL

AHEL'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 AHEL as at 30 November 2022 is provided below:

	Tier 1 Unrestricted £'m	Tier 1 Restricted £'m	Tier 2 £'m	Tier 3 £'m	Total £'m
<b>Balance as at 30 November 2022</b>					
Ordinary Share Capital	73.5	-	-	-	73.5
Share Premium Account related to Ordinary Share Capital	59.7	-	-	-	59.7
Reconciliation Reserve	1,326.9	-	-	-	1,326.9
Restricted Tier 1 contingent convertible notes	-	304.3	-	-	304.3
Subordinated Liabilities	-	-	-	-	-
Letters of Credit (Ancillary Own Funds)	-	-	400.0	-	400.0
Net Deferred Tax Assets	-	-	-	125.2	125.2
<b>Total Available Own Funds</b>	<b>1,460.2</b>	<b>304.3</b>	<b>400.0</b>	<b>125.2</b>	<b>2,289.7</b>

	Tier 1 Unrestricted £'m	Tier 1 Restricted £'m	Tier 2 £'m	Tier 3 £'m	Total £'m
<b>Balance as at 30 November 2021</b>					
Ordinary Share Capital	73.5	-	-	-	73.5
Share Premium Account related to Ordinary Share Capital	59.7	-	-	-	59.7
Reconciliation Reserve	1,402.7	-	-	-	1,402.7
Restricted Tier 1 contingent convertible notes	-	304.3	-	-	304.3
Subordinated Liabilities	-	-	-	-	-
Letters of Credit (Ancillary Own Funds)	-	-	400.0	-	400.0
Net Deferred Tax Assets	-	-	-	78.1	78.1
<b>Total Available Own Funds</b>	<b>1,535.9</b>	<b>304.3</b>	<b>400.0</b>	<b>78.1</b>	<b>2,318.3</b>

#### AMERICAN INTERNATIONAL GROUP UK LIMITED

The composition and total available own funds for the Company as at 30 November 2022 is provided below:

	Tier 1 Unrestricted £'m	Tier 1 Restricted £'m	Tier 2 £'m	Tier 3 £'m	Total £'m
<b>Balance as at 30 November 2022</b>					
Ordinary Share Capital	15.3	-	-	-	15.3
Share Premium Account related to Ordinary Share Capital	1,063.7	-	-	-	1,063.7
Reconciliation Reserve	546.2	-	-	-	546.2
Subordinated Liabilities	-	-	-	-	-
Letters of Credit (Ancillary Own Funds)	-	-	400.0	-	400.0
Net Deferred Tax Assets	-	-	-	118.7	118.7
<b>Total Available Own Funds</b>	<b>1,625.2</b>	<b>-</b>	<b>400.0</b>	<b>118.7</b>	<b>2,143.9</b>

	Tier 1 Unrestricted £'m	Tier 1 Restricted £'m	Tier 2 £'m	Tier 3 £'m	Total £'m
<b>Balance as at 30 November 2021</b>					
Ordinary Share Capital	15.3	-	-	-	15.3
Share Premium Account related to Ordinary Share Capital	1,063.7	-	-	-	1,063.7
Reconciliation Reserve	511.5	-	-	-	511.5
Subordinated Liabilities	-	-	-	-	-
Letters of Credit (Ancillary Own Funds)	-	-	400.0	-	400.0
Net Deferred Tax Assets	-	-	-	77.0	77.0
<b>Total Available Own Funds</b>	<b>1,590.5</b>	<b>-</b>	<b>400.0</b>	<b>77.0</b>	<b>2,067.5</b>

## TIER 1 BASIC OWN FUNDS

### AHEL

At 30 November 2022, AHEL's Tier 1 Basic Own Funds were made up of the following items:

- Ordinary share capital
- Solvency II reconciliation reserve
- Share Premium Account
- Restricted Tier 1 contingent convertible notes

AIG UK'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.

AHEL'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	2,064.8
Less:	
Ordinary Share Capital	(73.5)
Share Premium Account	(59.7)
Net Deferred Tax Assets	(125.2)
Other non-available own funds	(75.1)
Other items approved by supervisory authority as basic own funds	(304.3)
Foreseeable dividends and distributions	(100.0)
<b>Reconciliation Reserve</b>	<b>1,326.9</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	1,843.9
Less:	
Ordinary Share Capital	(15.3)
Share Premium Account	(1,063.7)
Net Deferred Tax Assets	(118.7)
Foreseeable dividends and distributions	(100.0)
<b>Reconciliation Reserve</b>	<b>546.2</b>

## TIER 2 BASIC OWN FUNDS

### AHEL

At 30 November 2022, there was no subordinated debt in AHEL.

### AMERICAN INTERNATIONAL GROUP UK LIMITED

At 30 November 2022, there was no subordinated debt in AIG UK.

## 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.

### AHEL

At 30 November 2022, there were no Letters of Credit (LOCs) in place for AHEL.

### AMERICAN INTERNATIONAL GROUP UK LIMITED

At 30 November 2022, AIG UK had the following LOCs in place:

Letters of Credit	PRA approval period	£'m
£300m of LOCs issued to AIG UK (£100m each)	01 August 2022 – 01 August 2026	300.0
£100m of LOC issued to AIG UK	24 April 2020 – 29 April 2024	100.0
<b>Total Letters of Credit</b>		<b>400.0</b>

**TIER 3 BASIC OWN FUNDS**

## AHEL

At 30 November 2022, AHEL had deferred tax assets of £125.2m on its Economic Balance Sheet, all of which counted towards its Tier 3 basic own funds.

## AMERICAN INTERNATIONAL GROUP UK LIMITED

At 30 November 2022, AIG UK had deferred tax assets of £118.7m on its Economic Balance Sheet, all of which counted towards its Tier 3 basic own funds.

**ELIGIBLE OWN FUNDS**

## AHEL

	Total £'m	Tier 1 (unrestricted) £'m	Tier 1 (restricted) £'m	Tier 2 £'m	Tier 3 £'m
Total eligible own funds to meet the SCR	2,289.7	1,460.2	304.3	400.0	125.2
Total available own funds to meet the SCR	2,289.7	1,460.2	304.3	400.0	125.2

## AMERICAN INTERNATIONAL GROUP UK LIMITED

	Total £'m	Tier 1 (unrestricted) £'m	Tier 1 (restricted) £'m	Tier 2 £'m	Tier 3 £'m
Total eligible own funds to meet the SCR	2,143.9	1,625.2	-	400.0	118.7
Total available own funds to meet the SCR	2,143.9	1,625.2	-	400.0	118.7

**FUNGIBILITY AND TRANSFERABILITY OF OWN FUNDS**

## AHEL

At 30 November 2022, AHEL recognised £75.1m 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 are not available to cover the Group SCR due to local regulations.

## AMERICAN INTERNATIONAL GROUP UK LIMITED

At 30 November 2022, AIG UK 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**

## AHEL

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 AHEL.

## 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.

Balance as at 30 November 2022	£'m
Equity as per UK GAAP	1,853.0
Solvency II valuation differences	(9.1)
<b>Excess of assets over liabilities under Solvency II</b>	<b>1,843.9</b>

**E.2 GROUP SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT**

AHEL's SCR at 30 November 2022 was £1,435.2m. The table below shows a breakdown of AHEL's SCR by risk and diversification benefit. AHEL uses a Partial Internal Model which is made up from entities that use Internal Model and SF.

A detailed analysis of the SCR and its components is disclosed in the Risk Profile section.

AHEL SCR (unaudited)	AHEL	AIG Israel	Group SCR
£'m			
	Y/E 2022	Y/E 2022	Y/E 2022
Insurance risk	951.6	158.1	1,109.7
Market risk	467.2	43.1	510.3
Credit risk	151.8	23.1	175.0
Operational risk	212.9	11.8	224.7
Pension risk	32.0	-	32.0
Loss Absorbing capacity of deferred taxes	-	(8.9)	(8.9)
Diversification	(523.4)	(84.2)	(607.6)
Total SCR	1,292.2	143.0	1,435.2

A Major Model Change application made in 2021 was approved by the PRA on 31 January 2022. This was for the change in the risk profile following the purchase of an Adverse Development Cover (ADC) reinsurance contract which provides cover against prior year development.

An application for a Major Model Change was submitted to the PRA on 11 November 2022. This is for a change to the Model Change Policy and will have no quantitative impact to AIG. As the approval date for this will be post 30 November 2022, AHEL and AIG UK are bound to report against the reporting view of the SCR prior to the Major Model Change application. As such, the reported SCR does not reflect model changes up to the year-end 2022 which provided further reductions in the SCR.

AIG Israel Standard Formula (SF) calculations are performed at 2022-Q3 for the AHEL YEAR-END 2022 capital calculation as AIG Israel has a 31 December 2022 year-end reporting date.

The method for calculating the consolidated SCR is Method 1.

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 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 SCRs.

AHEL's reported diversification benefit includes the diversification between risk components and the PIM diversification but does not include the diversification within each of the risk components. The reported diversification benefit for AHEL is £523m on an undiversified SCR of £1.8bn which represents 29% of total undiversified capital. This is broadly similar to its constituent entities apart from AIG Israel which has a diversification benefit of £84m which represents 37% of undiversified capital.

**MINIMUM CAPITAL REQUIREMENT (MCR)****AHEL**

The Group MCR represents a minimum level below which the inputs used for the calculation of Group MCR are provided in the table below:

- It is calculated in accordance with the SF, which is subject to a defined floor and cap based on the risk-based Solvency Capital Requirement.
- The AHEL MCR for the reporting period is £720.7m. This is simply the sum of the respective Solo MCRs of AIG UK and AIG Israel.

The inputs used for the calculation of Group MCR are provided in the table below:

<b>MCR Components</b>	<b>£'m</b>
AIG UK Solo MCR	502.6
AIG Israel Solo MCR	218.1
<b>Group MCR</b>	<b>720.7</b>

**AMERICAN INTERNATIONAL GROUP UK LIMITED**

The following table shows the MCR calculation:

<b>Overall MCR calculation</b>	<b>£'m</b>
Linear MCR	502.6
SCR (Unaudited)	1,269.8
MCR cap	571.4
MCR floor	317.5
Combined MCR	502.6
Absolute floor of the MCR	6.4
<b>Minimum Capital Requirement</b>	<b>502.6</b>

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

### AHEL

AHEL did not make use of the duration-based equity risk sub-module in the reporting during this reporting period.

### AMERICAN INTERNATIONAL GROUP UK LIMITED

AIG UK did not make use of the duration-based equity risk sub-module in the reporting during this reporting period.

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

### AHEL

AHEL uses a Partial Internal Model in the calculation of its SCR.

### AMERICAN INTERNATIONAL GROUP UK LIMITED

AIG UK at 30 November 2022 used the Internal Model for the calculation of the Solvency Capital Requirement.

This section provides a summary of the Internal Model including how it is used, methods used in the calculation of the SCR, techniques used to integrate the PIM and comparison to the SF.

### E4.1 Use of the Internal Model in the business

The Internal Model reflects AHEL's view of risk in its insurance operations and has an Igloo calculation kernel which aggregates data from various sources and quantifies potential variances to the business plan. Both the model inputs and model results are used extensively within the management and decision making process.

AHEL has categorised Model Uses into five sections:

#### 1. Capital Management

The primary purpose of the Internal Model is to calculate the SCR for regulatory reporting under Solvency II. It is used to develop a Target Capital Level to determine the appropriate level of capital to be held by allowing for the ultimate view of risk.

#### 2. Portfolio Management

As part of the Business Plan Risk Review, the risk profile and capital requirements of the business plan are assessed through the Internal Model. The risk profile is assessed against the Board approved risk appetite to ensure undue levels of risks are not being planned. The risk review also quantifies the probabilities of not making profits for underwriting and investment returns as well as highlighting the returns that would be achieved at various key return periods.

#### 3. Risk Management

The Risk Appetite Statement approved by the Board defines parameters within which the company must operate and provides a framework against which the business must report to the BRC on the current risk profile. The Risk Limits split out the overall entity level 1:7 & 1:200 Risk Tolerances into our major risk types. Target (Green) 1:7 and 1:200 risk levels are set for each risk type, as well as Escalation (Amber) and Limit (Red) levels. These appetite limits are reported against the Internal Model results. The output of the model feeds into the Risk Appetite Framework. These outputs from the model are monitored on a quarterly basis to ascertain any breaches in thresholds. These breaches are flagged at the relevant committees so that any appropriate remediation can be put in place.

The Internal Model is also used for the ORSA which provides the Board and senior management with a comprehensive assessment of the risk profile. The ORSA provides both a qualitative as well as quantitative assessment of these risks, and the quantification included in the ORSA is obtained from Internal Model output.

#### 4. Asset Management

The Internal Model is used to assess the impact of changes in market conditions on assets and liabilities by:

- a) Calculating Market Risk Charges which feed into a daily report tracking the total Market Risk consumption at different levels of granularity.
- b) A framework for managing the currency holdings of the capital resources has been developed using the Internal Model to determine the level of capital in each currency to match the capital requirements arising in that currency, with all excess capital held in GBP.
- c) The SAA process uses the Internal Model to provide a set of metrics that can facilitate ongoing monitoring of asset-related risks and setting of risk limits, assessment of proposed asset allocation strategies and sensitivity analysis of model results to asset-related inputs.

## 5. Reinsurance Management

The Internal Model is used to assess the impact of reinsurance contracts used to mitigate against undesirable individual or aggregate exposures. The capital impacts resulting from the reinsurance contracts can then be compared with the cost of the contracts to determine its appropriateness.

### E4.2 Scope of the Internal Model

The scope of the Internal Model is designed to ensure that all material quantifiable risks which the entity is exposed to have been captured. The model is designed around a series of modules each of which is linked to the risk areas of the Risk Management Framework and included within the risk register. Some of the risks included within the risk register have been deemed immaterial and therefore have not been included within the scope of the model and instead are managed through the business as usual process.

In order to determine the risks in scope of the Internal Model, the risk profile of the entity was assessed. The risk scope of the Internal Model has been designed such that it complies with Article 101 of Directive 2009/138/EC and its outputs can provide an accurate representation of the entity's risk profile and project the most material sources of risk. In order to ensure that all material quantifiable risks of the entity are included in scope of the model the risk register and risk appetite were used as a starting point.

The SCR covers at least the following risks: Insurance Risk, Market Risk, Operational Risk and Credit Risk. Operational Risk and Man-Made Catastrophe Risk are modelled through RDS due to the limited availability of data to produce a representative statistical loss distribution. Instead of utilising an exhaustive list of scenarios, consideration and effort has been provided into producing a list of scenarios that are representative of the company's risk profile and include losses from events not captured in data. The scenarios focus more on capturing all possible losses based on the risk profile than the underlying events that can cause these losses. Therefore, not all possible events are explicitly modelled but their potential losses have been considered in the scenarios used.

Not all risk components have been included in the scope of the Internal Model. For example, the data used by the model is not directly in scope, but rather indirectly in scope through the governance of the data, data requirements and the data quality assessments. The processes for generating these inputs to the model are also considered outside the scope of the model because they are part of the wider business as usual activities. These processes are subject to internal governance and controls. The risk register is a tool that is used to assess the risk profile of the company and validate the risk coverage of the Internal Model. As such it is not considered in scope of the Internal Model. However, as discussed above, the model is designed to take into account all material risks modelled around the Risk Management Framework.

### E4.3 Calculation of the Internal Model

#### E4.3.1 Methods Used

AHEL has developed an Internal Model in accordance with the requirements of Solvency II as well as its own internal capital needs.

The core component of the Internal Model is known as the Calculation Kernel. This can be thought of as the core calculation engine where the majority of the capital calculation takes place. The Calculation Kernel also combines any risk modelling performed outside of the kernel in other tools, such as the asset-modelling software.

The Internal Model is a stochastic model, which is commonly run for 100,000 simulations. The number of simulations can be changed via the input settings. As with all stochastic models, an increased number of simulations helps with providing convergence to the model outputs (particularly when looking at tail percentiles) and reduces simulation sampling error.

The model uses a number of cash flows in its calculations. Despite this, the overall capital result and balance sheet information is only provided at the end of the projection period. Intermediary calculations are not reportable at an overall balance sheet or capital level. In this respect the overall design of the model provides information on the capital requirement for a particular time. However, it does not show how the capital requirement has changed over this period.

The Accounts Model collates all risk types modelled in earlier components of the Calculation Kernel. It produces the following technical accounts (considering premiums, claims, expenses and commissions) for every Modelling Unit: Technical Balance Sheet, Underwriting Account and Technical Cash-flow Statement. These are produced using inputs from the Reserve Risk, Premium Risk, Reinsurance, and Credit Risk models, along with cash-flow assumptions (claims and premium payment patterns) which are input directly into the Accounts Model, and economic assumptions (discount rates, exchange rates) from the ESG.

At the Country level, the Accounts Model combines the technical accounts for all lines of business and incorporates asset balances and returns from the Asset Model, along with other risk types that exist only at the aggregate level: Operational Risk, Credit Risk on Receivables, and Pension Risk. From these items, the following financial statements are produced: Opening Balance Sheet, Income Statement, and Closing Balance Sheet. The Legal Entity accounts are produced by aggregating the individual business unit accounts.

The simulated Income Statement gives the overall loss distribution from which the capital requirement is determined. Capital is allocated to risk type and line of business, the method for which depends on use.

The three main currencies (GBP, EUR and USD) are modelled using information from the ESG, which are used to assess both the asset and liability positions. The modelling is done at a more granular level including the following separate currencies where applicable: AUD, CAD, CHF, DKK, EUR, GBP, JPY, NOK, SEK and USD. However, the model is not limited to just these and can easily be expanded to cover additional currencies if needed.

The individual currencies are converted to one reporting currency for the Income Statement and Balance Sheet reporting. This reporting currency varies depending on the business unit selected.

The Internal Model currently looks to provide the capital required under a one-year time frame. The basis of the cohort for this one year is an accident year (AY), which is consistent to the basis of reserving in UK and Europe and the format that most data is found and available in.

Under Solvency II, the SCR is calculated on an accident year basis and is calculated as the capital required at the outset (time zero) such that in one year's time, assets are greater than or equal to liabilities at the 99.5th percentile (i.e. the Value-at-Risk of the Basic Own Funds subject to a confidence level of 99.5% over a one-year time horizon). This implies recognition of the time-value of money with a consideration of movements within the accident year.

The dependency structure of the model aims to capture all the potential interactions between the risks of the Company. AHXL operates in a global business environment and recognises that these correlations can be very complex to parameterise and to capture appropriately within the modelling structure. The dependency structure captures dependencies between business units, lines of business and risk types. The purpose of the model is to capture the full range of possible outcomes. In essence, the key requirement of the dependency structure is to model and assess the diversification benefits resulting from the aggregation and the mitigation of the risks for a multi-country and multi-line operating company, in a clear and where possible explicit manner.

As a core component of the model, the dependency structure extends to all risk factors to which AHXL is exposed to. These risks include Non-Catastrophe Insurance Risk, Catastrophe Risk, Reinsurance Counterparty Risk, Market Risk, Credit Risk and Operational Risk.

The dependency structure plays a key role in the Internal Model as the aggregation method between risk types and for quantifying the level of diversification between AIG's key risks. In addition to dependencies between risk types, the dependency structure also considers interrelationships between calibrated risk units within a particular risk type. Diversification and aggregation is key to insurance and is the fundamental principle of the pooling of risk. Furthermore, insurers like AIG benefit from diversification by writing in various countries and Line of Business sectors.

**E4.3.2 Data Used**

The data requirements for the Internal Model as captured in the Data Directory are categorised into segments broadly aligned to business functions providing data and risk types for which it is used. At present, the Data Directory content has been classified into the following data segments:

No.	Data Segment	Data Subsets
1	Actuarial	Actuarial data is used as a direct input into the model (non-calibration data) and to feed the calibration (calibration data): <ul style="list-style-type: none"> <li>• Non calibration data: historical earned premium, best estimate reserves, payment patterns, unallocated claims expense (ULAE), currency mix, Bound But Not Incepted written premium and risk margin;</li> <li>• Calibration data: historical incurred and paid loss triangles, large loss details, catastrophe claims, earned premium, best estimate reserves, premium rate changes, claims inflation rates (estimated increase in claim amounts based on reported inflation rates), budget loss ratios.</li> </ul>
2	Assets	Details of AIG's investments; economic scenarios generated from the ESG.
3	Credit Risk Reinsurer	Reinsurers' share of the OSLR, IBNR, UEPR, incurred and paid losses, bad debts, collaterals. Credit Ratings by Reinsurer.
4	Finance	Actual balance sheet, prior-year written premium, UEPR, commissions, receivables, payables.
5	Legal Entity Plan (Strategic Finance, FP&A)	AIG legal entities' five year plan (Income statement) including input data used in the process to produce the plan (e.g. premium and expense growth rate, RI ratios), unless covered in other data segments.
6	Man-Made Catastrophe	Man-Made Catastrophe scenarios' details including potential losses and their correlations.
7	Natural Catastrophe	Natural Catastrophe exposure modelled based on policy details, adjustment factors to compensate for data quality, completeness and modelling appropriateness.
8	Operational Risk	Operational Risk scenarios' details.
9	Reinsurance	XOL and QS reinsurance contracts' details including potential losses; ratios for prior-year reinsurance



No.	Data Segment	Data Subsets
10	Tax	Tax rates and prior-year paid tax admissible for deferred tax benefit. Future based on actual data so there is little uncertainty
11	Credit Risk Broker	Broker details, credit ratings and receivables split into under and over 90 days (clearing adjustments).
12	Dependencies	Values and parameters that support the parameterisation of the model change the characteristics of the Internal Model when it runs.
13	Pension Risk	Pensions Best Estimate reserves obtained from the external scheme administrator.

#### E4.3.3 Integration Technique for Partial Internal Model

Article 239(1) of the Delegated Regulation provides a default integration technique to integrate a PIM with the SF based on correlation matrices and formulas of the SF set out in Annex IV of the Directive and Title I, Chapter V of the Delegated Regulation.

This default technique is centred on risk types, rather than legal entities, being out of scope of the PIM. In particular, the SF correlation matrix reflects the dependency between risks and not the dependency between legal entities. As the Internal Model models all of AHEL's risks excluding the aforementioned insurance subsidiary, this technique is not feasible for AHEL's group PIM. This is the condition described in Article 239(5)(c) of the Delegated Regulation which says that an integration technique shall not be appropriate if the design of the PIM would not allow its integration with the SF (using the technique). By way of example, the dependency between a non-life underwriting risk module and a life underwriting risk module is not the same as the dependency between a non-life insurance company (AIG UK) and a composite insurance company (AIG Israel), which makes the SF correlation matrix unusable for AHEL's Group SCR.

In such cases as this, Article 239(2) of the Delegated Regulation allows for alternative integration techniques to be adopted instead. These alternatives are outlined in Annex XVIII of the Delegated Regulation.

Due to the limitation of the default integration technique, AHEL will use Integration Technique 1 instead.

Annex XVIII of the Delegated Regulation defines the Basic Solvency Capital Requirement under Integration Technique 1 to be equal to the sum of:

- the capital requirements for the units of the PIM,
- the capital requirement derived by applying the SF for the Basic SCR only to the risks that are out of the scope of the PIM
- the capital requirement for intangible asset risk as set out in Article 203.

Notwithstanding the language of this description which refers to a PIM for a solo entity, the intention of this technique is clear and can be applied to a PIM for a group.

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

- the capital requirement of the PIM
- the capital requirement of the SF

#### E4.4 Differences between the Standard Formula and Internal Model methodologies and underlying assumptions

The key drivers of the differences between the SF SCR and IM SCR are as follows:

- **Different Calculation Basis:** The most basic difference between the SF and AIG UK's Internal Model is the general approach taken to calculating the SCR. The SF 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 is derived. At lower levels of risks, like for like comparisons, can be difficult as the SF is only focused at the 99.5th percentile.
- **Dependency Structure – Correlation & Diversification:** The SF 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 AIG UK. For example, when modelling Insurance Risk, the SF does not fully allow for the level of line of business and geographical diversification inherent within AIG UK's insurance risk profile.
- **Mean Profitability in Business Plan:** The SF does not take credit for any business plan profit. The current approved model also removes this credit for underwriting profit. AIG UK excludes planned underwriting profit within the SCR due to a lack of clear history of meeting their planned underwriting targets.
- **Pension Risk:** The SF applies a look through approach to the defined benefit pension plan and does not model the pension risk as a standalone risk type.

- **Catastrophe Risk Diversification:** A higher capital requirement for the SF Catastrophe Risk is observed because the SF allows for 'Accident Concentration Risk' with respect to buildings with highest concentration which is not allowed for in the Internal Model.
- **Operational Risk Diversification:** The SF assumes 100% correlation between Operational Risk and other risk types. Hence makes no allowance for diversification benefits between Operational Risk and other risk types. The Internal Model, on the other hand, makes allowance for diversification benefits between operational risk and other risk types.

The main differences between the SF and IM methodologies and assumptions by risk type are set out below:

**Underwriting Risk / Premium Risk** – The SF Makes no allowances for the cross - subsidies of profits/losses between different lines of business. The calculation assumes that when stresses are applied, every line of business suffers losses. The IM allows for the cross subsidies between lines of business. For example, for a particular simulation, if one line of business is profitable and another is loss-making, the profit can be used to offset the loss in the underwriting result. The allowance for the cross subsidies between lines of business can reduce the overall capital requirement on the IM basis.

**Man-made Catastrophe** – SF uses a simplistic “scenario” based approach. The scenarios are prescribed by the regulation and are generally based on the largest exposures. The IM uses a RDS approach.

**Natural Catastrophe** – The SF uses a simplistic factor based calculations based on the sum insured in different CRESTA zones. The IM uses simulated losses from a Catastrophe Model across world-wide exposures.

**Market risk (Equity Risk)** – The SF applies risk charge to Strategic Participations whereas the IM does not model fluctuations in balance sheet value of participations

**Market risk (Foreign Exchange Risk)** – The SF uses a flat risk charge of 25% for non-GBP (AIG UK’s reporting currency) balances. The IM models this on an economic basis using the ESG.

**Market risk (Concentration Risk)** – The SF explicitly models this as a sub risk type within Market Risk whereas the IM implicitly models this within Investment Credit Risk.

**Counterparty risk / Credit Risk** – The SF includes credit risk on cash whereas the IM accounts for this within Market Risk

**Operational Risk** – The SF uses a simplistic method based on percentage of premium or technical provisions. No allowance for diversification between Operational Risk and other risk types. The IM uses a scenario based approach which explicitly allows for diversification between Operational Risk and other risk types.

**Pension Risk** – The SF follows a look through approach for pension scheme assets and liabilities. The assets and liabilities are modelled in different parts of the SF calculation. The IM models Pension Risk as a standalone risk type.

**Lapse Risk** – The SF allows for a proportion of the EPFP to be removed from own funds due to lapses. No allowance is made for this in the IM.

## E.5 NON-COMPLIANCE WITH SCR AND MCR

### AHEL

During the reporting period, there were no instances of non-compliance with the Solvency II capital requirements. In addition, AHEL 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, AIG UK held Own Funds in excess of both the SCR and MCR requirements.

## E.6 ANY OTHER INFORMATION

As at 30 November 2022, there is no other material information regarding Capital Management of the Company.



## **Solvency & Financial Condition Report 2022**

# **F. Appendices to the Solvency and Financial Condition Report**

**KEY ELEMENTS OF THE SECTION ARE:**

- Glossary;
- AHEL QRTs; and
- AIG UK QRTs.

## F.1 GLOSSARY

### A

<b>AIG Inc</b>	American International Group Inc
<b>A&amp;H</b>	Accident and Health
<b>AAMEL</b>	AIG Asset Management (Europe) Limited
<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
<b>FX</b>	Foreign Exchange

**G**

<b>GAAP</b>	Generally Accepted Accounting Principles
<b>GCG</b>	Global Compliance Group
<b>GDP</b>	Gross Domestic Profit
<b>GL</b>	General Liability
<b>GOE</b>	Gross Operating Expenses
<b>GPE</b>	Gross Premiums Earned
<b>GPW</b>	Gross Premium Written

**H**

<b>HR</b>	Human Resources
-----------	-----------------

**I**

<b>IAG</b>	Internal Audit Group
<b>IBNR</b>	Incurred but not Reported
<b>ICAS</b>	Individual Capital Adequacy Standards
<b>ICG</b>	Individual Capital Guidance
<b>IFRS</b>	International Financial Reporting Standards
<b>ILS</b>	Insurance Linked Securities
<b>IM</b>	Internal Model
<b>IMA</b>	Investment Management Agreement
<b>IMAP</b>	Internal Model Approval Process

**K**

<b>KRI</b>	Key Risk Indicator
------------	--------------------

**L**

<b>LAC - DT</b>	Loss Absorbing Capacity of Deferred Taxes
<b>LACR</b>	Liquid Assets Coverage Ratio
<b>LCO</b>	Local Compliance Officer
<b>LFL</b>	Liability & Financial Lines
<b>LoB</b>	Lines of Business
<b>LoC</b>	Letters of Credit
<b>LTP</b>	Late Travelling Premium
<b>LUT</b>	Large and Unusual Transactions

**M**

<b>M&amp;A</b>	Mergers & Acquisitions
<b>M&amp;T</b>	Monitoring and Testing Group
<b>MCR</b>	Minimum Capital Requirement
<b>MGA</b>	Managing General Agent
<b>MI</b>	Management Information
<b>MMC</b>	Man-made Catastrophe

**N**

<b>NB</b>	New Business
<b>NII</b>	Net Investment Income
<b>NPE</b>	Net Premiums Earned
<b>NPW</b>	Net Premiums Written

**O**

<b>ORM</b>	Operational Risk Management
<b>ORR</b>	Obligor Risk Rating
<b>ORSA</b>	Own Risk and Solvency Assessment
<b>OSP</b>	Outsourcing Service Provider

**P****Q**

<b>QRT</b>	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
<b>XoL</b>	Excess of Loss

# AIG Holdings Europe Limited

## Solvency and Financial Condition Report

### Disclosures

30 November

**2022**

(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 2022
Currency used for reporting	GBP
Accounting standards	Local GAAP
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	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 - non-life

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

S.05.02.01 - Premiums, claims and expenses by country - non-life

S.05.02.01 - Premiums, claims and expenses by country - life

S.23.01.22 - Own Funds

S.25.02.22 - Solvency Capital Requirement - for groups using the standard formula and partial Internal Model - part 1

S.25.02.22 - Solvency Capital Requirement - for groups using the standard formula and partial Internal Model - part 2

S.32.01.22 - Undertakings in the scope of the group



**5.02.01.02  
Balance sheet**

		<b>Solvency II value</b>
		C0010
<b>Assets</b>		
R0030	Intangible assets	
R0040	Deferred tax assets	125,193
R0050	Pension benefit surplus	23,820
R0060	Property, plant & equipment held for own use	104,866
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	5,050,354
R0080	<i>Property (other than for own use)</i>	0
R0090	<i>Holdings in related undertakings, including participations</i>	35,885
R0100	<i>Equities</i>	0
R0110	<i>Equities - listed</i>	
R0120	<i>Equities - unlisted</i>	
R0130	<i>Bonds</i>	4,793,989
R0140	<i>Government Bonds</i>	1,808,552
R0150	<i>Corporate Bonds</i>	2,943,358
R0160	<i>Structured notes</i>	0
R0170	<i>Collateralised securities</i>	42,079
R0180	<i>Collective Investments Undertakings</i>	28,625
R0190	<i>Derivatives</i>	0
R0200	<i>Deposits other than cash equivalents</i>	191,855
R0210	<i>Other investments</i>	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	399,748
R0240	<i>Loans on policies</i>	
R0250	<i>Loans and mortgages to individuals</i>	68
R0260	<i>Other loans and mortgages</i>	399,680
R0270	Reinsurance recoverables from:	1,539,520
R0280	<i>Non-life and health similar to non-life</i>	1,534,118
R0290	<i>Non-life excluding health</i>	1,533,556
R0300	<i>Health similar to non-life</i>	562
R0310	<i>Life and health similar to life, excluding index-linked and unit-linked</i>	5,402
R0320	<i>Health similar to life</i>	3,660
R0330	<i>Life excluding health and index-linked and unit-linked</i>	1,742
R0340	<i>Life index-linked and unit-linked</i>	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	42,158
R0370	Reinsurance receivables	525,458
R0380	Receivables (trade, not insurance)	176,216
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	170,497
R0420	Any other assets, not elsewhere shown	
R0500	<b>Total assets</b>	<b>8,157,830</b>
<b>Liabilities</b>		
R0510	Technical provisions - non-life	5,501,788
R0520	<i>Technical provisions - non-life (excluding health)</i>	5,450,869
R0530	<i>TP calculated as a whole</i>	
R0540	<i>Best Estimate</i>	4,950,104
R0550	<i>Risk margin</i>	500,765
R0560	Technical provisions - health (similar to non-life)	50,919
R0570	<i>TP calculated as a whole</i>	
R0580	<i>Best Estimate</i>	40,437
R0590	<i>Risk margin</i>	10,481
R0600	Technical provisions - life (excluding index-linked and unit-linked)	38,438
R0610	<i>Technical provisions - health (similar to life)</i>	-14,970
R0620	<i>TP calculated as a whole</i>	
R0630	<i>Best Estimate</i>	-20,650
R0640	<i>Risk margin</i>	5,681
R0650	Technical provisions - life (excluding health and index-linked and unit-linked)	53,408
R0660	<i>TP calculated as a whole</i>	
R0670	<i>Best Estimate</i>	36,220
R0680	<i>Risk margin</i>	17,187
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	33,388
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	66,547
R0780	Deferred tax liabilities	14,046
R0790	Derivatives	0
R0800	Debts owed to credit institutions	17
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	3,017
R0830	Reinsurance payables	9,505
R0840	Payables (trade, not insurance)	426,263
R0850	Subordinated liabilities	0
R0860	<i>Subordinated liabilities not in BOF</i>	
R0870	<i>Subordinated liabilities in BOF</i>	0
R0880	Any other liabilities, not elsewhere shown	
R0900	<b>Total liabilities</b>	<b>6,093,009</b>
R1000	<b>Excess of assets over liabilities</b>	<b>2,064,821</b>









5.23.01.22  
Own Funds

**Basic own funds before deduction for participations in other financial sector**

R0010 Ordinary share capital (gross of own shares)  
R0020 *Non-available called but not paid in ordinary share capital at group level*  
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  
R0060 *Non-available subordinated mutual member accounts at group level*  
R0070 Surplus funds  
R0080 *Non-available surplus funds at group level*  
R0090 Preference shares  
R0100 *Non-available preference shares at group level*  
R0110 Share premium account related to preference shares  
R0120 *Non-available share premium account related to preference shares at group level*  
R0130 Reconciliation reserve  
R0140 Subordinated liabilities  
R0150 *Non-available subordinated liabilities at group level*  
R0160 An amount equal to the value of net deferred tax assets  
R0170 *The amount equal to the value of net deferred tax assets not available at the group level*  
R0180 Other items approved by supervisory authority as basic own funds not specified above  
R0190 *Non available own funds related to other own funds items approved by supervisory authority*  
R0200 Minority interests (if not reported as part of a specific own fund item)  
R0210 *Non-available minority interests at group level*

**R0220 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**  
**R0230 Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities**  
R0240 *whereof deducted according to art 228 of the Directive 2009/138/EC*  
R0250 Deductions for participations where there is non-availability of information (Article 229)  
R0260 Deduction for participations included by using D&A when a combination of methods is used  
R0270 **Total of non-available own fund items**  
R0280 **Total deductions**  
R0290 **Total basic own funds after deductions**

**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  
R0380 Non available ancillary own funds at group level  
R0390 Other ancillary own funds  
R0400 **Total ancillary own funds**

**Own funds of other financial sectors**

R0410 Credit institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies  
R0420 Institutions for occupational retirement provision  
R0430 Non regulated entities carrying out financial activities  
R0440 **Total own funds of other financial sectors**

5.23.01.22  
Own Funds

**Basic own funds before deduction for participations in other financial sector**

**Own funds when using the D&A, exclusively or in combination of method 1**  
R0450 Own funds aggregated when using the D&A and combination of method  
R0460 Own funds aggregated when using the D&A and combination of method net of IGT  
R0520 Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)  
R0530 Total available own funds to meet the minimum consolidated group SCR  
R0560 Total eligible own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)  
R0570 Total eligible own funds to meet the minimum consolidated group SCR (group)  
R0610 **Minimum consolidated Group SCR**  
R0650 **Ratio of Eligible own funds to Minimum Consolidated Group SCR**  
R0660 **Total eligible own funds to meet the group SCR (including own funds from other financial sector and from the undertakings included via D&A)**  
R0680 **Group SCR**  
R0690 **Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A**

**Reconciliation reserve**

R0700 Excess of assets over liabilities  
R0710 Own shares (held directly and indirectly)  
R0720 Forseeable 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  
R0750 Other non available own funds  
R0760 **Reconciliation reserve**

**Expected profits**

R0770 Expected profits included in future premiums (EPIFP) - Life business  
R0780 Expected profits included in future premiums (EPIFP) - Non-life business  
R0790 **Total Expected profits included in future premiums (EPIFP)**

Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
73,524	73,524			
59,697	59,697			
1,326,948	1,326,948			
0			0	
125,193				125,193
304,352		304,352		
1,889,713	1,460,169	304,352	0	125,193

400,000			400,000	
400,000			400,000	


Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
C0010	C0020	C0030	C0040	C0050
2,289,713	1,460,169	304,352	400,000	125,193
1,764,521	1,460,169	304,352	0	
2,289,713	1,460,169	304,352	400,000	125,193
1,908,664	1,460,169	304,352	144,143	
720,716				
264.83%				
2,289,713	1,460,169	304,352	400,000	125,193
1,435,202				
159.54%				

Total
C0060
2,064,821
100,000
562,766
75,107
1,326,948

81,849
271,541
353,390

S.25.02.22

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

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

Unique number of component	Component description	Calculation of the Solvency Capital Requirement	Amount modelled	USP	Simplifications	
Row 1	C0010	C0020	C0030	C0070	C0090	C0120
1	Group SCR		1,435,202		9	17-None

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		1,435,202
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>		1,435,202
R0210	Capital add-ons already set		
R0220	<b>Solvency capital requirement for undertakings under consolidated method</b>		1,435,202
<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		
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		720,716
<b>Information on other entities</b>			
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</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		
<b>Overall SCR</b>			
R0560	SCR for undertakings included via D and A		
R0570	<b>Solvency capital requirement</b>		1,435,202

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	Criteria of influence					Inclusion in the scope of Group supervision		Group solvency calculation		
								% 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	
Row	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
1	IL	213800YIPNSZBM BRV45	LEI	AIG Israel Insurance Company Ltd.	Composite undertaking	Company limited by shares	Non-mutual	Supervisor of Insurance (Israel)	100.00%	100.00%	100.00%	N/A	Dominant	100.00%	Included in the scope		Method 1: Full consolidation
2	GB	21380087VQZV5Q023G83	LEI	American International Group UK Limited	Non life insurance undertaking	Company limited by shares	Non-mutual	Prudential Regulation Authority	100.00%	100.00%	100.00%	N/A	Dominant	100.00%	Included in the scope		Method 1: Full consolidation
3	GB	213800UHT558FWPQVQ02	LEI	AIG Trade Finance Limited	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual		100.00%	100.00%	100.00%	N/A	Dominant	100.00%	Included in the scope		Method 1: Full consolidation
4	GB	XWPHK451M3QR1MIR4E200049	Specific code	CI Group	Ancillary services undertaking as defined in Article 1 (53) of Delegated Regulation (EU) 2015/35	Company limited by shares	Non-mutual		19.99%	19.99%	19.99%	N/A	Significant	19.99%	Included in the scope		Method 1: Adjusted equity method
5	GB	2138009F8D5FYGF8G820	LEI	AIG Holdings Europe Limited	Insurance holding company as defined in Article 212(1) (f) of Directive 2009/138/EC	Company limited by shares	Non-mutual		100.00%	100.00%	100.00%	N/A	Dominant	100.00%	Included in the scope		Method 1: Full consolidation
6	GB	213800NUVVGDIYYL181	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		100.00%	100.00%	100.00%	N/A	Dominant	100.00%	Included in the scope		Method 1: Full consolidation



# American International Group UK Limited

## Solvency and Financial Condition Report

### Disclosures

30 November

**2022**

(Monetary amounts in GBP thousands)

**General information**

Undertaking name	American International Group UK Limited
Undertaking identification code	21380087VX2V5QO23G83
Type of code of undertaking	LEI
Type of undertaking	Undertakings pursuing both life and non-life insurance activity - article 73 (5)
Country of authorisation	GB
Language of reporting	en
Reporting reference date	30 November 2022
Currency used for reporting	GBP
Accounting standards	Local GAAP
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 - non-life

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

S.05.02.01 - Premiums, claims and expenses by country - non-life

S.05.02.01 - Premiums, claims and expenses by country - life

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.23.01.01 - Own Funds

S.25.03.21 - Solvency Capital Requirement - for undertakings on Full Internal Models - part 1

S.25.03.21 - Solvency Capital Requirement - for undertakings on Full Internal Models - part 2

S.28.02.01 - Minimum Capital Requirement - Both life and non-life insurance activity

S.02.01.02

Balance sheet

		Solvency II value
		C0010
<b>Assets</b>		
R0030	Intangible assets	0
R0040	Deferred tax assets	118,676
R0050	Pension benefit surplus	23,820
R0060	Property, plant & equipment held for own use	95,977
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	4,642,603
R0080	<i>Property (other than for own use)</i>	0
R0090	<i>Holdings in related undertakings, including participations</i>	83,187
R0100	Equities	0
R0110	Equities - listed	0
R0120	Equities - unlisted	0
R0130	Bonds	4,362,153
R0140	Government Bonds	1,676,353
R0150	Corporate Bonds	2,643,722
R0160	Structured notes	0
R0170	Collateralised securities	42,079
R0180	Collective Investments Undertakings	5,579
R0190	Derivatives	0
R0200	Deposits other than cash equivalents	191,685
R0210	Other investments	0
R0220	Assets held for index-linked and unit-linked contracts	0
R0230	Loans and mortgages	340,777
R0240	Loans on policies	0
R0250	Loans and mortgages to individuals	0
R0260	Other loans and mortgages	340,777
R0270	Reinsurance recoverables from:	1,376,466
R0280	Non-life and health similar to non-life	1,371,805
R0290	Non-life excluding health	1,371,243
R0300	Health similar to non-life	562
R0310	Life and health similar to life, excluding index-linked and unit-linked	4,661
R0320	Health similar to life	0
R0330	Life excluding health and index-linked and unit-linked	4,661
R0340	Life index-linked and unit-linked	0
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	36,101
R0370	Reinsurance receivables	525,233
R0380	Receivables (trade, not insurance)	161,374
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	140,916
R0420	Any other assets, not elsewhere shown	0
R0500	<b>Total assets</b>	<b>7,461,945</b>
<b>Liabilities</b>		
R0510	Technical provisions - non-life	5,090,995
R0520	Technical provisions - non-life (excluding health)	5,042,141
R0530	TP calculated as a whole	0
R0540	Best Estimate	4,558,110
R0550	Risk margin	484,031
R0560	Technical provisions - health (similar to non-life)	48,855
R0570	TP calculated as a whole	0
R0580	Best Estimate	39,071
R0590	Risk margin	9,784
R0600	Technical provisions - life (excluding index-linked and unit-linked)	73,720
R0610	Technical provisions - health (similar to life)	0
R0620	TP calculated as a whole	0
R0630	Best Estimate	0
R0640	Risk margin	0
R0650	Technical provisions - life (excluding health and index-linked and unit-linked)	73,720
R0660	TP calculated as a whole	0
R0670	Best Estimate	64,844
R0680	Risk margin	8,876
R0690	Technical provisions - index-linked and unit-linked	0
R0700	TP calculated as a whole	0
R0710	Best Estimate	0
R0720	Risk margin	0
R0740	Contingent liabilities	0
R0750	Provisions other than technical provisions	33,388
R0760	Pension benefit obligations	0
R0770	Deposits from reinsurers	7,005
R0780	Deferred tax liabilities	4,515
R0790	Derivatives	0
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	0
R0830	Reinsurance payables	0
R0840	Payables (trade, not insurance)	408,419
R0850	Subordinated liabilities	0
R0860	Subordinated liabilities not in BOF	0
R0870	Subordinated liabilities in BOF	0
R0880	Any other liabilities, not elsewhere shown	0
R0900	<b>Total liabilities</b>	<b>5,618,042</b>
R1000	<b>Excess of assets over liabilities</b>	<b>1,843,902</b>



S.05.02.01

Premiums, claims and expenses by country

Non-life

Home Country	C0010	C0020	C0030	C0040	C0050	C0060	C0070
	Top 5 countries (by amount of gross premiums written) - non-life obligations			Top 5 countries (by amount of gross premiums written) - non-life obligations			Total Top 5 and home country
	US	CO	AR	CL	CA		
	C0080	C0090	C0100	C0110	C0120	C0130	C0140
<b>Premiums written</b>							
R0110 Gross - Direct Business	1,849,841	104,506	0	543	173	22,874	1,977,938
R0120 Gross - Proportional reinsurance accepted	58,848	63,051	25,516	31,462	113,026	30,684	322,588
R0130 Gross - Non-proportional reinsurance accepted	8,623	25,069	3,760	5,081	17,622	3,393	63,549
R0140 Reinsurers' share	813,771	211,564	23,357	31,104	120,950	45,047	1,245,794
R0200 Net	1,103,541	-18,938	5,919	5,982	9,872	11,904	1,118,280
<b>Premiums earned</b>							
R0210 Gross - Direct Business	1,801,207	91,197	0	543	173	22,884	1,916,004
R0220 Gross - Proportional reinsurance accepted	64,102	65,401	25,516	31,462	113,026	30,765	330,272
R0230 Gross - Non-proportional reinsurance accepted	9,622	24,486	3,760	5,081	17,622	3,444	64,015
R0240 Reinsurers' share	714,181	204,790	23,357	31,104	120,950	45,040	1,139,422
R0300 Net	1,160,750	-23,706	5,919	5,982	9,872	12,053	1,170,870
<b>Claims incurred</b>							
R0310 Gross - Direct Business	1,063,769	67,823	0	0	221,306	3,494	1,356,393
R0320 Gross - Proportional reinsurance accepted	16,989	68,910	1,417	20,917	-2,707	-2,657	102,868
R0330 Gross - Non-proportional reinsurance accepted	2,427	19,225	354	2,397	-334	-260	23,809
R0340 Reinsurers' share	398,593	171,360	752	19,858	215,500	-3,481	802,581
R0400 Net	684,592	-15,401	1,018	3,456	2,765	4,059	680,489
<b>Changes in other technical provisions</b>							
R0410 Gross - Direct Business							
R0420 Gross - Proportional reinsurance accepted							
R0430 Gross - Non-proportional reinsurance accepted							
R0440 Reinsurers' share							
R0500 Net							
R0550 Expenses incurred	302,173	30,358	4,614	5,845	20,618	8,976	372,583
R1200 Other expenses							
R1300 Total expenses							372,583

S.05.02.01

Premiums, claims and expenses by country

Life

Home Country	C0150	C0160	C0170	C0180	C0190	C0200	C0210
	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
	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	1,768						1,768
R1620 Reinsurers' share	151						151
R1700 Net	1,617						1,617
<b>Changes in other technical provisions</b>							
R1710 Gross							
R1720 Reinsurers' share							
R1800 Net							
R1900 Expenses incurred	59						59
R2500 Other expenses							
R2600 Total expenses							59

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	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				
	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
<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								0		0						
<b>R0020</b>								0		0						
associated to TP calculated as a whole																
<b>Technical provisions calculated as a sum of BE and RM</b>																
<b>Best estimate</b>																
<b>R0030 Gross Best Estimate</b>								64,844		64,844						
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default								4,661		4,661						
<b>R0080</b>																
Best estimate minus recoverables from reinsurance/SPV and Finite Re								60,183		60,183						
<b>R0090</b>																
<b>R0100 Risk margin</b>								8,876		8,876						
<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						
<b>R0130</b> Risk margin								0		0						
<b>R0200 Technical provisions - total</b>								73,720		73,720						0

5.17.01.02  
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>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	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 Best estimate</b>																		
<b>Premium provisions</b>																		
R0060 Gross	-9,708	-16,321	0	13,851	-495	-14,706	-51,644	-895	10,213			-3,068	19,756		1,878	-363	-2,368	-53,871
R0140 Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	-518	-455	0	13,766	-439	-30,253	-237,953	-65,683	-3,200			-1,573	-2,902		0	0	0	-329,209
<b>R0150 Net Best Estimate of Premium Provisions</b>	-9,191	-15,866	0	85	-56	15,547	186,309	64,788	13,412			-1,495	22,657		1,878	-363	-2,368	275,338
<b>Claims provisions</b>																		
R0160 Gross	22,161	42,940	0	211,485	9,560	558,134	841,413	2,627,133	114,324			8,086	66,139		107,726	11,319	30,632	4,651,051
R0240 Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	925	611	0	116,892	1,750	249,894	493,971	752,445	67,555			3,568	13,404		0	0	0	1,701,014
<b>R0250 Net Best Estimate of Claims Provisions</b>	21,236	42,329	0	94,593	7,810	308,240	347,441	1,874,689	46,769			4,518	52,735		107,726	11,319	30,632	2,950,038
<b>R0260 Total best estimate - gross</b>	12,452	26,619	0	225,337	9,065	543,428	789,769	2,626,238	124,536			5,018	85,895		109,603	10,956	28,264	4,597,181
<b>R0270 Total best estimate - net</b>	12,045	26,463	0	94,679	7,755	323,788	533,750	1,939,477	60,181			3,023	75,392		109,603	10,956	28,264	3,225,376
<b>R0280 Risk margin</b>	3,176	6,608	0	14,289	1,351	51,123	63,124	308,981	8,606			875	13,031		14,016	2,032	6,604	493,815
<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
R0300 Best estimate	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
<b>R0320 Technical provisions - total</b>	15,628	33,227	0	239,626	10,416	594,551	852,893	2,935,219	133,142			5,893	98,926		123,619	12,988	34,868	5,090,995
<b>Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total</b>	407	155	0	130,658	1,311	219,640	256,018	686,762	64,355			1,996	10,502		0	0	0	1,371,805
<b>R0340 Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total</b>	15,221	33,072	0	108,967	9,105	374,911	596,874	2,248,458	68,787			3,897	88,423		123,619	12,988	34,868	3,719,190

S.19.01.21 Non-Life insurance claims Total Non-life business

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	Development year										C0170 In Current year	C0180 Sum of years (cumulative)		
	C0010 0	C0020 1	C0030 2	C0040 3	C0050 4	C0060 5	C0070 6	C0080 7	C0090 8	C0100 9			C0110 10 & +	
R0100	Prior											194,153	194,153	
R0160	2013	243,557	316,927	185,793	109,411	101,247	63,329	54,007	11,101	7,895	10,284	10,284	1,103,552	
R0170	2014	205,063	345,924	260,333	89,176	59,645	54,691	19,989	34,918	107,010		107,010	1,176,750	
R0180	2015	257,687	385,635	230,686	128,906	187,707	108,526	22,406	17,442			17,442	1,338,995	
R0190	2016	340,876	506,595	214,114	139,282	71,268	37,673	118,080				118,080	1,427,888	
R0200	2017	231,409	437,290	239,518	189,494	114,281	37,710					37,710	1,249,702	
R0210	2018	321,207	778,773	358,023	129,381	128,113						128,113	1,715,498	
R0220	2019	340,973	290,128	169,671	326,362							326,362	1,127,134	
R0230	2020	252,476	316,617	149,836								149,836	718,928	
R0240	2021	193,593	311,985									311,985	505,579	
R0250	2022	227,066										227,066	227,066	
R0260												<b>Total</b>	1,628,041	10,785,246

Gross Undiscounted Best Estimate Claims Provisions  
(absolute amount)

Year	Development year										C0360 Year end (discounted data)		
	C0200 0	C0210 1	C0220 2	C0230 3	C0240 4	C0250 5	C0260 6	C0270 7	C0280 8	C0290 9		C0300 10 & +	
R0100	Prior											455,793	396,177
R0160	2013	-	-	-	147,953	376,033	286,189	162,872	148,714	59,163	97,387	97,387	84,342
R0170	2014	-	-	81,079	496,347	405,156	263,521	165,528	155,437	78,361		78,361	68,428
R0180	2015	-	100,984	560,100	551,662	369,598	266,451	173,280	213,557				185,631
R0190	2016	132,391	764,979	612,193	512,176	376,942	279,776	218,780					190,972
R0200	2017	1,292,753	846,694	612,204	505,572	391,345	361,055						314,164
R0210	2018	1,443,065	810,281	578,385	536,760	492,137							429,511
R0220	2019	1,352,473	776,893	609,831	680,299								598,580
R0230	2020	1,273,003	829,963	625,135									559,914
R0240	2021	1,353,100	878,216										786,603
R0250	2022	1,147,237											1,036,728
R0260												<b>Total</b>	4,651,051



## 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

	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
R0010 Ordinary share capital (gross of own shares)	15,320	15,320			
R0030 Share premium account related to ordinary share capital	1,063,663	1,063,663			
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	546,243	546,243			
R0140 Subordinated liabilities					
R0160 An amount equal to the value of net deferred tax assets	118,676				118,676
R0180 Other own fund items approved by the supervisory authority as basic own funds not specified above					
<b>R0220 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>					
<b>R0230 Deductions for participations in financial and credit institutions</b>					
<b>R0290 Total basic own funds after deductions</b>	<b>1,743,902</b>	<b>1,625,226</b>	<b>0</b>	<b>0</b>	<b>118,676</b>
<b>Ancillary own funds</b>					
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	400,000			400,000	
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					
<b>R0400 Total ancillary own funds</b>	<b>400,000</b>			<b>400,000</b>	
<b>Available and eligible own funds</b>					
R0500 Total available own funds to meet the SCR	2,143,902	1,625,226	0	400,000	118,676
R0510 Total available own funds to meet the MCR	1,625,226	1,625,226	0	0	
R0540 Total eligible own funds to meet the SCR	2,143,902	1,625,226	0	400,000	118,676
R0550 Total eligible own funds to meet the MCR	1,625,226	1,625,226	0	0	
R0580 SCR	1,269,836				
R0600 MCR	502,588				
R0620 Ratio of Eligible own funds to SCR	168.83%				
R0640 Ratio of Eligible own funds to MCR	323.37%				
<b>Reconciliation reserve</b>					
R0700 Excess of assets over liabilities	1,843,902				
R0710 Own shares (held directly and indirectly)					
R0720 Foreseeable dividends, distributions and charges	100,000				
R0730 Other basic own fund items	1,197,659				
R0740 Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds					
<b>R0760 Reconciliation reserve</b>	<b>546,243</b>				
<b>Expected profits</b>					
R0770 Expected profits included in future premiums (EIPFP) - Life business					
R0780 Expected profits included in future premiums (EIPFP) - Non- life business	271,541				
<b>R0790 Total Expected profits included in future premiums (EIPFP)</b>	<b>271,541</b>				

## 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
Row	C0010	C0020	C0030
1	10600I	Property Risk	23,786
2	10400I	Equity risk	49,499
3	10900I	Currency Risk	329,836
4	11000I	Investment Credit	87,224
5	50302I	Non-Life Man Made Catastrophe Premium Risk	256,427
6	20200I	Type 2 counterparty risk	0
7	80300I	Loss-absorbing capacity of deferred tax	0
8	10700I	Spread Risk	269,128
9	20100I	Type 1 counterparty risk	159,593
10	80100P	Pension Risk	32,017
11	80400I	Other Adjustments	0
12	50200I	Reserve Risk	610,341
13	19900I	Diversification within market risk	-418,479
14	50100I	Non Cat Premium Risk	287,999
15	10300I	Interest rate Risk	119,908
16	70100I	Operational Risk	213,192
17	29900I	Diversification within counterparty risk	-7,273
18	59900I	Diversification within non-life underwriting risk	-502,080
19	50301I	Non-Life Natural Catastrophe Premium Risk	282,190

## S.25.03.21

## Solvency Capital Requirement - for undertakings on Full Internal Models

## Calculation of Solvency Capital Requirement

	C0100
R0110 Total undiversified components	1,793,309
R0060 Diversification	-523,473
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>	1,269,836
R0210 Capital add-ons already set	0
R0220 <b>Solvency capital requirement</b>	1,269,836

## 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	
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	

## Approach to tax rate

	C0109
R0590 Approach based on average tax rate	Not applicable

## Calculation of loss absorbing capacity of deferred taxes

	LAC DT
	C0130
R0640 Amount/estimate of LAC DT	
R0650 Amount/estimate of LAC DT justified by reversion of deferred tax liabilities	
R0660 Amount/estimate of LAC DT justified by reference to probable future taxable economic profit	
R0670 Amount/estimate of AC DT justified by carry back, current year	
R0680 Amount/estimate of LAC DT justified by carry back, future years	
R0690 Amount/estimate of Maximum LAC DT	

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	501,324	0		
	Net (of reinsurance/SPV) best estimate and TP calculated	Net (of reinsurance) written premiums in the last 12 months	Net (of reinsurance/SPV) best estimate and TP calculated	Net (of reinsurance) written premiums in the last 12 months
	C0030	C0040	C0050	C0060
R0020 Medical expense insurance and proportional reinsurance	12,045	31,813		
R0030 Income protection insurance and proportional reinsurance	26,463	58,878		
R0040 Workers' compensation insurance and proportional reinsurance	0	0		
R0050 Motor vehicle liability insurance and proportional reinsurance	94,679	44,332		
R0060 Other motor insurance and proportional reinsurance	7,755	5,487		
R0070 Marine, aviation and transport insurance and proportional reinsurance	323,788	207,629		
R0080 Fire and other damage to property insurance and proportional reinsurance	533,750	225,264		
R0090 General liability insurance and proportional reinsurance	1,939,477	527,243		
R0100 Credit and suretyship insurance and proportional reinsurance	60,181	12,892		
R0110 Legal expenses insurance and proportional reinsurance	0	0		
R0120 Assistance and proportional reinsurance	3,023	12,314		
R0130 Miscellaneous financial loss insurance and proportional reinsurance	75,392	41,848		
R0140 Non-proportional health reinsurance	0	0		
R0150 Non-proportional casualty reinsurance	109,603	46,945		
R0160 Non-proportional marine, aviation and transport reinsurance	10,956	9,599		
R0170 Non-proportional property reinsurance	28,264	61,290		
	MCR <sub>(L,NL)</sub> Result	MCR <sub>(L,L)</sub> Result		
	C0070	C0080		
R0200 Linear formula component for life insurance and reinsurance obligations	0	1,264		
	Net (of reinsurance/SPV) best estimate and TP calculated	Net (of reinsurance/SPV) total capital at risk	Net (of reinsurance/SPV) best estimate and TP calculated	Net (of reinsurance/SPV) total capital at risk
	C0090	C0100	C0110	C0120
R0210 Obligations with profit participation - guaranteed benefits				
R0220 Obligations with profit participation - future discretionary benefits				
R0230 Index-linked and unit-linked insurance obligations				
R0240 Other life (re)insurance and health (re)insurance obligations	0		60,183	
R0250 Total capital at risk for all life (re)insurance obligations				
<b>Overall MCR calculation</b>	C0130			
R0300 Linear MCR	502,588			
R0310 SCR	1,269,836			
R0320 MCR cap	571,426			
R0330 MCR floor	317,459			
R0340 Combined MCR	502,588			
R0350 Absolute floor of the MCR	6,374			
R0400 <b>Minimum Capital Requirement</b>	502,588			
<b>Notional non-life and life MCR calculation</b>	C0140	C0150		
R0500 Notional linear MCR	501,324	1,264		
R0510 Notional SCR excluding add-on (annual or latest calculation)	1,266,643	3,193		
R0520 Notional MCR cap	569,989	1,437		
R0530 Notional MCR floor	316,661	798		
R0540 Notional combined MCR	501,324	1,264		
R0550 Absolute floor of the notional MCR	3,187	3,187		
R0560 <b>Notional MCR</b>	501,324	3,187		