Solvency and Financial Condition Report

Benefact Group plc
For the year ended 31 December 2024

BENEFACT GROUP

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Executive Summary

Introduction

This Solvency and Financial Condition Report (SFCR) has been prepared in line with the requirements of the Solvency II Regulations (SII) per the Prudential Regulation Authority (PRA) Rulebook, to assist the customers, business partners and shareholders of Benefact Group plc (BG, the Group) and other stakeholders in understanding the nature of the business, how it is managed and its solvency position.

Our business

The Group is a specialist financial services group with a charitable owner and purpose and a distinctive positioning that sets it apart from other businesses in the financial services sector. The Group's purpose is to create long-term value for its shareholders, by leveraging the Group's charitable purpose and specialisms to create competitive advantage and to deliver growing financial returns to its shareholder and owner, which are then distributed to charitable causes and communities, contributing to society's greater good.

The Group's charitable purpose drives its strategic goal of being the most trusted and ethical business in our chosen markets. It also shapes the way it does business, particularly its focus on doing the right thing for its customers and business partners. It creates an environment where sustainable, long-term value generation is prized over short-term results.

The Group does this by managing an ethically run global portfolio of businesses covering specialist insurance, broking and advisory services, and asset management. The Group provides products and services to businesses, organisations and retail customers, both directly and through intermediaries. As the UK's leading insurer of Grade I listed buildings, the Group is passionate about protecting Britain's heritage.

More information about the Group structure and the business it writes can be found in section A.

Business performance

The Group reported a profit before tax for 2024 of £77.6m (2023: £34.4m). These results were driven by an excellent performance within the Specialist Insurance division (Ecclesiastical Insurance Office Group), reporting a profit before tax of £46.1m (2023: £25.0m), together with increased profits within the Broking and Advisory division of £6.1m (2023: £0.6m loss). The Asset Management division reported a loss for the year of £4.9m (2023: £6.5m).

The Group's underwriting businesses achieved strong results in the year and continued to grow insurance revenue, building on the strength of our position in core segments and recent product launches in the UK. The increase in gross written premiums of 4.2% to £640.6m (2023: £615.0m) reflected excellent new business wins and rate strengthening. Underwriting experience has benefitted from particularly benign weather claims and a more stable claims environment, resulting in an insurance service result of £72.7m (2023: £56.2m) and a Group Combined Operating Ratio (COR) of 86.9% (2023: 92.6%).

The Group has continued and will continue to manage its businesses with a long-term view of risk. As a result it has a strong capital position that can withstand short term volatility. EIO plc is rated A2 by Moody's and A by AM Best. The Group's SII regulatory capital position remains above regulatory requirements and risk appetite.

Solvency and financial condition

A summary of the Group's solvency position at the end of 2024 and the change over the year is shown below:

Summary Solvency position	2024	2023	Change
	£'000	£'000	£'000
Available Own Funds	**618,675**	**597,763**	**20,912**
Solvency Capital Requirement			
Market risk	198,771	228,866	(30,095)
Counterparty default risk	38,330	32,417	5,913
Non-life underwriting risk	159,294	161,804	(2,510)
Life underwriting risk	2,869	2,009	860
Operational risk	35,640	33,432	2,208
Other risks	5,294	14,421	(9,127)
Diversification	(193,043)	(210,006)	16,963
Loss absorbing capacity of deferred tax	(37,300)	(34,200)	(3,100)
Other adjustments	42,219	34,145	8,074
Consolidated SCR	252,074	262,888	(10,814)
Sectoral capital requirement of investment firm	5,500	2,587	2,913
Group SCR	**257,574**	**265,475**	**(7,901)**
Coverage ratio	**240%**	**225%**	**15%**

The Group's regulatory solvency surplus has increased during the year, and continues to remain above risk appetite. Own funds increased by £20.9m mainly reflecting the improvement in investment markets in the year and the gain made in the year, although increases in Technical Provisions, and dividends paid in the year has reduced the impact of these gains.

The Group's Solvency Capital Requirement (SCR) decreased in the year by £7.9m, driven by Market Risk, with higher expected investment returns and further de-risking of the Pension Fund from a position of strong surplus in particular driving a reduction.

The movement in available own funds is explained in more detail in section E.1 and more detail on the changes in SCR during the year are given in section E.2.

Outlook for 2025

Whilst inflation rates are still above the Bank of England target, interest rates are expected to remain stable for the immediate term, with forecasts of modest falls over the medium term. The continuation of low growth and high costs of borrowing at the beginning of 2025, have led to Bank of England forecasts for growth being cut for 2025. Given ongoing geopolitical tensions and global uncertainty, including that arising from recently announced trade tariffs, market volatility is expected to continue. Changes from the new US administration in trade and tariff policies are not expected to directly impact the Group's businesses. These policy changes however may have implications for inflation and interest rate decisions. The Group is alert to these risks and will continue to monitor and manage these and other risks.

The Benefact Group has now achieved its ambition of giving £250m to good causes, which is a remarkable milestone in the Group's charitable objectives.

On 1 May 2025 the Group acquired the remaining issued ordinary shares of the Lloyd & Whyte Group limited, which is reflected in the structure chart in section A.1.5 Group structure.

Solvency levels are very strong and projected to remain so over the plan period, with no instances of a breach to its MCR, SCR or the Board's risk appetite having occurred up to the date of this report being published.

The Group continues to take a long-term view of risk, is expected to remain well capitalised and is capable of withstanding potential future volatility. 2025 will see continued investment in new systems to improve the customer and broker experience, and continued investment in new technology to drive innovation and growth to enable yet more giving to charities and communities. In particular, the Group will continue to invest in our risk management offering to help to protect customers from new and emerging threats.

Statement of Directors' responsibilities

Benefact Group plc

Financial year ended 31 December 2024.

The Directors are responsible for preparing the SFCR in accordance with the Solvency II Regulations (SII) per the Prudential Regulatory Authority (PRA) rulebook.

Each of the Directors, whose names and functions are listed in the Board of Directors section of the Group's Annual Report & Accounts, confirm that, to the best of their knowledge:

a. throughout the financial year in question, the Group has complied in all material respects with the requirements of the PRA Rules and the Solvency II Regulations as applicable to the insurer; and

b. it is reasonable to believe that, at the date of the publication of the SFCR, the Group continues so to comply, and will continue so to comply in future.

By Order of the Board

Mark Hews
Director and Chief Executive Officer
Date: 13 May 2025

Audit Report

PwC template unmodified auditors' report on relevant elements of the SFCR: Group, partial/full internal model – periods ending on or after 31 December 2024

Report of the external independent auditors to the Directors of Benefact Group plc ('the Group') pursuant to Rule 4.1 (2) of the External Audit Part of the PRA Rulebook applicable to Solvency II firms

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

Opinion

Except as stated below, we have audited the following documents prepared by the Group as at 31 December 2024:

- The 'Valuation for solvency purposes' and 'Capital management' sections of the Group Solvency and Financial Condition Report of the Group as at 31 December 2024, ('**the Narrative Disclosures subject to audit**'); and
- Group templates IR.02.01.02, IR.22.01.22, IR.23.01.04 and IR.32.01.22 ('**the Templates subject to audit'**).

The Narrative Disclosures subject to audit and the Templates subject to audit are collectively referred to as the '**relevant elements of the Group 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 Group 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 Group Solvency and Financial Condition Report;
- Group templates IR.05.02.01, IR.05.03.02, and IR.05.04.02 and IR.25.04.22;
- The written acknowledgement by management of their responsibilities, including for the preparation of the Group Solvency and Financial Condition Report ('**the Responsibility Statement**'); and
- Information which pertains to an undertaking that is not a UK Solvency II firm and has been prepared in accordance with PRA Rules other than the Reporting Part of the PRA Rulebook or UK law other than law deriving from the FSMA that applies to UK Solvency II firms ('**the sectoral information')** as identified in the Appendix to this report.

To the extent the information subject to audit in the relevant elements of the Group 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 Group Solvency and Financial Condition Report of the Group as at 31 December 2024 is prepared, in all material respects, in accordance with the financial reporting provisions of the PRA Rules, as modified by relevant supervisory modifications, and as supplemented by supervisory permissions 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 *Auditors' Responsibilities for the Audit of the relevant elements of the Group Solvency and Financial Condition Report* section of our report. We are independent of the Group in accordance with the ethical requirements that are relevant to our audit of the Group Solvency and Financial Condition Report in the UK, including the FRC's Ethical Standard as applied to public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

Our evaluation of the Directors' assessment of the Group's ability to continue to adopt the going concern basis of accounting included:

- Obtained and reviewed management's going concern assessment which included the board approved income statement, balance sheet, cash flow and solvency forecasts along with stressed and downside scenarios;
- Considered the forward looking assumptions and assessed the reasonableness of these based on recent historic performance;
- Considered information obtained during the course of the audit and publicly available market information to identify any evidence that would contradict management's assessment; and
- Considered our own independent alternative downside scenarios and whether these could impact the going concern assessment.

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 Group's ability to continue as a going concern for a period of at least twelve months from the date on which the Group Solvency and Financial Condition Report is authorised for issue.

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

However, because not all future events or conditions can be predicted, this conclusion is not a guarantee as to the Group's ability to continue as a going concern.

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

Emphasis of Matter - Basis of Accounting

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

Other Information

The Directors are responsible for the Other Information.

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

In connection with our audit of the Group 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 Group 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 Group 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 Group Solvency and Financial Condition Report

The Directors are responsible for the preparation of the Group Solvency and Financial Condition Report in accordance with the financial reporting provisions of the PRA Rules, which have been modified by the modifications, and supplemented by the permissions and determinations made by the PRA under section 138A of FSMA and the PRA Rules, as detailed below:

- Approval to use a full or partial internal model
- Approval to apply volatility adjustment

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

Auditors' Responsibilities for the Audit of the relevant elements of the Group Solvency and Financial Condition Report

It is our responsibility to form an independent opinion as to whether the information subject to audit in the relevant elements of the Group Solvency and Financial Condition Report is prepared, in all material respects, in accordance with financial reporting provisions of the PRA Rules.

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

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

Based on our understanding of the Group and industry, we identified that the principal risks of non-compliance with laws and regulations related to breaches of UK regulatory principles such as those governed by the Prudential Regulation Authority (UK) and the Financial Conduct Authority (UK), and we considered the extent to which non-compliance might have a material effect on the Group Solvency and Financial Condition Report. We also considered those laws and regulations that have a direct impact on the Group Solvency and Financial Condition Report such as PRA rules. We evaluated management's incentives and opportunities for fraudulent manipulation of the Group Solvency and Financial Condition Report (including the risk of override of controls), and determined that the principal risks were related to posting inappropriate journal entries to manipulate the financial statements as well as management bias in accounting estimates, in particular the valuation of specific general insurance contract liabilities including Physical and Sexual Abuse ("PSA") reserves. Audit procedures performed included:

- Enquired of Group functions including compliance, risk and internal audit and consideration of known or suspected instances of non-compliance with laws and regulation and fraud;
- Read key correspondence with the Prudential Regulation Authority and the Financial Conduct Authority in relation to compliance with laws and regulations;
- Reviewed relevant meeting minutes including those of the BG Board, BG Audit, Risk & Compliance Committee;
- Procedures related to the valuation of specific general insurance contract liabilities such as PSA reserves;
- Risk based target testing of journal entries, in particular any journal entries which include characteristics which were identified as potentially being indicative of a fraudulent journal; and
- Procedures to incorporate unpredictability around the nature, timing or extent of our testing

There are inherent limitations in the audit procedures described above. We are less likely to become aware of instances of non-compliance with laws and regulations that are not closely related to events and transactions reflected in the Group Solvency and Financial Condition Report. Also, the risk of not detecting a material misstatement due to fraud is higher than the risk of not detecting one resulting from error, as fraud may involve deliberate concealment by, for example, forgery or intentional misrepresentations, or through collusion.

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

Use of this report

This report, including the opinion, has been prepared for the Board of Directors of the Group in accordance with External Audit rule 2.1 of the Solvency II firms Sector of the PRA Rulebook and for no other purpose. We do not, in providing this report, accept or assume responsibility for any other purpose or to any other party save where expressly agreed by our prior consent in writing.

Other Matter – partial internal model

The Group has authority to calculate its Group Solvency Capital Requirement using a partial internal model ('the Group Model') approved by the Prudential Regulation Authority. 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, or whether the Group Model is being applied in accordance with the Group's application or approval order.

Report on Other Legal and Regulatory Requirements

Sectoral Information

In our opinion, in accordance with Rule 4.2 of the External Audit Part of the PRA Rulebook, the sectoral information has been properly compiled in accordance with the relevant PRA rules and UK law relating to that undertaking from information provided by members of the group and the relevant insurance group undertaking.

Other Information

In accordance with Rule 4.1 (3) of the External Audit Part of the PRA Rulebook for Solvency II firms we are also required to consider whether the Other Information is materially inconsistent with our knowledge obtained in the audit relevant elements of the Solvency and Financial Condition Report and (where applicable) the audit of the Group'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.

The engagement partner on the audit resulting in this independent auditors' report is Gary Shaw.

PricewaterhouseCoopers LLP
Chartered Accountants
2 Glass Wharf,
Bristol,
BS2 0FR
13 May 2025

Appendix – relevant elements of the Group Solvency and Financial Condition Report that are not subject to audit

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

- The following elements of Group template IR.02.01.02:
  - Row R0565: Transitional (TMTP) – life
  - Row R0552: Risk margin - total
  - Row R0554: Risk margin - non-life
  - Row R0556: Risk margin - life

- The following elements of Group template IR.22.01.22
  - Column C0030 – Impact of transitional on technical provisions
  - Row R0010 – Technical provisions
  - Row R0090 – Solvency Capital Requirement

- The following elements of Group template IR.23.01.04
  - 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
  - Rows R0410 to R0440 – Own funds of other financial sectors
  - 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

- Elements of the Narrative Disclosures subject to audit identified as 'unaudited'.

A. Business and performance

A.1 Business details and group structure

A.1.1 Name and legal form of the company

Benefact Group plc (BG, the Group) is a public limited company incorporated and domiciled in England. The address of the registered office is:

Benefact House
2000 Pioneer Avenue
Gloucester Business Park
Brockworth
Gloucester
GL3 4AW

BG is a mixed activity insurance holding company, incorporated and operating in the United Kingdom. BG is a wholly-owned subsidiary of Benefact Trust Limited (BTL).

BG, together with its direct and indirect subsidiaries (collectively, the Group) operates principally as a provider of general insurance and in addition offers a range of financial services, with offices in the UK & Ireland, Australia and Canada.

A.1.2 Supervisory authority

The supervisory authority for the Group is:

Prudential Regulation Authority
Bank of England
20 Moorgate
London
EC2R 6DA

A.1.3 External auditor

PricewaterhouseCoopers LLP
2 Glass Wharf
Temple Quay
Bristol
BS2 0FR

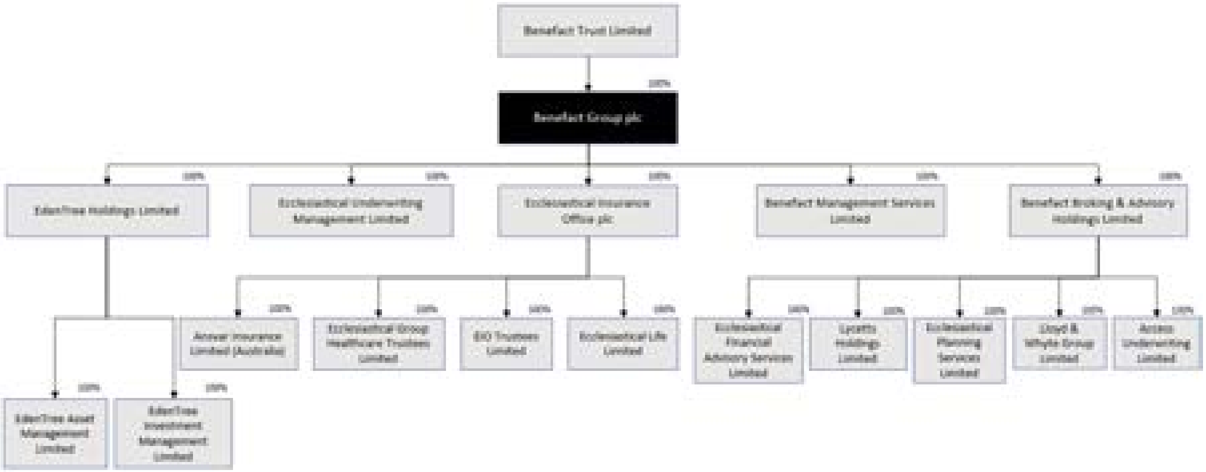
A.1.4 Qualifying holdings

Qualifying holdings are a direct or indirect holding in BG which represents 10% or more of the capital or of the voting rights of BG, or a holding that makes it possible to exercise a significant influence over the Group.

BTL owns 19,999,999 ordinary £1 shares and the Chair of BG owns, in a non-beneficial capacity, 1 ordinary £1 share.

A.1.5 Group structure

Below is a simplified representation of the Benefact Group:



Subsidiaries and related undertakings

The following is a list of material subsidiaries, all of which are 100% owned either directly or indirectly by BG as at 31 December 2024:

Incorporated in the United Kingdom:

- *EdenTree Holdings Limited (EHL)* is a holding company consisting the asset management division of the Group.
    - *EdenTree Investment Management Limited (EdenTree IM)* is an investment firm that manages the investments of the Group as well as managing the assets of third parties.
    - *EdenTree Asset Management Limited (EdenTree AM)* is an investment firm that manages the investments of the Group and third parties.
- *Ecclesiastical Insurance Office plc (EIO)* is a non-life insurance undertaking. The majority of its business is written in the UK, but it also has branches in Ireland and Canada. Within the meaning of the PRA Rulebook, Canada is a material branch as its premium written represents more than 5% of the Group's total gross written premium. In addition, EIO has a portfolio of investments and has 100% holdings in the following material subsidiaries:
    - *Ecclesiastical Life Limited (ELL)* provides long-term policies to support funeral planning products. The business reopened to new investment business in 2021 but it is closed to new insurance business.
- *Benefact Broking & Advisory Holdings Limited (BBAHL)* is a holding company consisting the broking and advisory division of the Group.

- *Ecclesiastical Financial Advisory Services Limited* provides financial advice to individuals, principally within the Church of England client base.

- *Lycetts Holdings Limited and its subsidiaries* is an insurance broking and independent financial advisory group operating through branches in the UK.

- *Ecclesiastical Planning Services Limited (EPSL)* provide the distribution and administration of prepaid funeral plans.

- *Access Underwriting Limited* is an insurance broking and independent financial advisory group operating through branches in the UK.

Incorporated in Australia:

- *Ansvar Insurance Limited (Ansvar Australia)* is a third country non-life insurance undertaking incorporated and domiciled in Australia. Ansvar Australia also has a portfolio of investments.

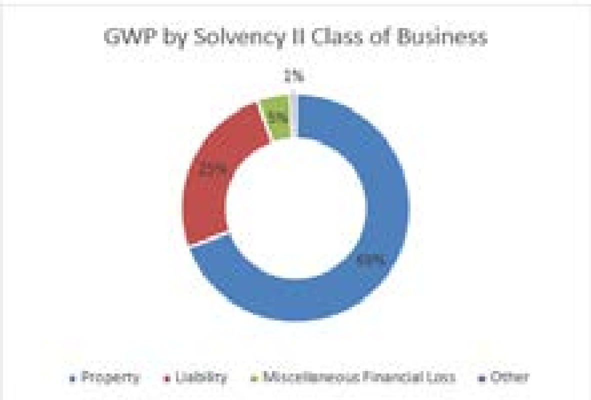
A.1.6 Lines of business

General Insurance business

The Group currently operates in the United Kingdom, Republic of Ireland, Canada and Australia. The material lines of business are:

- Fire and other damage to property
- General liability
- Miscellaneous financial loss

The proportion of each type of business written, and proportion of GWP by country are shown in the charts below:



A.1.7 Significant events

During 2024, whilst interest rates and inflation stabilised, borrowing rates began to rise and so whilst there was positive news in most equity markets, bond yields have risen in the period causing bond values to fall. These factors have contributed to the financial risks faced by the Group and impacted the value of its investments. Whilst rates of inflation have reduced they remain above the Bank of England target and whilst there has been a recent cut in interest rates in early 2025, they are expected to remain relatively stable over the rest of the year. Growth forecasts for 2025 in the UK have been halved by the Bank of England, with investor confidence still fairly low. Given ongoing geopolitical tensions and global uncertainty, including that arising from recently announced trade tariffs, market volatility is expected to continue. Changes from the new US administration in trade and tariff policies are not expected to directly impact the Group's businesses. These policy changes however may have implications for inflation and interest rate decisions.

These risks are being continually monitored and the Group is managing the ongoing impact of these risks, utilising business continuity and risk management processes where appropriate.

The Group has a robust and regular solvency monitoring process in place together with a strong risk management framework. Whilst 2024 solvency surplus is strong, the Group continues to monitor the impact of key risks. Up to the date of this report being published no instances of a breach of its MCR, SCR or the Board's risk appetite have been identified.

The significant risks to which the Group is exposed and how these are managed are discussed in more detail in section C.

A.2 Performance from underwriting activities

A.2.1 Overall underwriting performance

The Group's underwriting performance for the year was a profit of £32.7m (2023: £30.7m profit). This represents a strong performance in a year where there were some large claims, especially in the General Liability section.

The Group's life business made a net underwriting performance of £29.4m (2023: £35.2m*). The main driver of the result has been from the improvement in investment markets in the year.

*this reflects an updated number from 2023 due to a change in presentation of the new business coming through in the life business and now being included within premiums and claims.

A.2.2 Performance by material class of business

Underwriting performance by Solvency II line of business	General Liability		Fire and Other Damage to Property		Misc. Financial Loss	
	2024 £'000	2023 £'000	2024 £'000	2023 £'000	2024 £'000	2023 £'000
Net Earned Premium	141,088	134,490	201,846	180,720	14,256	11,955
Net Claims Incurred	(60,207)	(55,431)	(73,942)	(79,518)	(619)	(580)
Operating Expenses	(60,758)	(60,307)	(96,669)	(91,333)	(2,669)	(5,472)
Underwriting Performance	**20,123**	**18,752**	**31,235**	**9,869**	**10,967**	**5,903**

Underwriting performance by Solvency II line of business	Other		Life Business	
	2024 £'000	2023 £'000	2024 £'000	2023* £'000
Net Earned Premium	697	3,195	46,419	42,908
Net Claims Incurred	6,369	(6,085)	(17,416)	(14,444)
Operating Expenses	(36,688)	(765)	(1,222)	(1,324)
Underwriting Performance	**(29,622)**	**(3,655)**	**27,781**	**27,140**
Net investment return of assets backing liabilities			1,579	8,079
Net underwriting result			**29,360**	**35,219**

*This represents a change in approach to the inclusion of the data flowing through the Investment side of the business.

General Liability

The underwriting result from the liability account continued to perform favourably, with increases in claims incurred and operating expenses being offset with a larger increase in net earned premium.

Fire and other damage to property

The property account has shown an improved performance in the year driven by higher premium and stable claims experience and expenses in the year.

Miscellaneous financial loss

The improved underwriting result here reflects the increase in premium alongside a fall in claims experience and expenses.

Other

For 2024, the other segment includes the impact of internal reinsurance accepted by Ecclesiastical covering development on historic liabilities of the Australia subsidiary, as well as corporate costs reported separately in 2023.

Life business

ELL reported a net underwriting result of £29.4m for the year (2023: £35.2m*). ELL operates solely in the UK.

Until August 2021, ELL's business comprised an in-force portfolio of policies consisting entirely of whole-of-life insurance policies written for the purpose of funding funeral provision. This business is in run-off, with new business having ceased in April 2013.

ELL re-opened to new business in August 2021 with the launch of whole-of-life investment contracts backed by an investment product provided by an external organisation. These contracts themselves back pre-paid funeral plans written by EPSL, a fellow member of the Group, and a third party provider. The new business reported a gain due to movements in investment markets in the year, whilst the in-force business continued to run at a gain as per the net underwriting result.

*This represents a change in approach to the inclusion of the data flowing through the Investment side of the business.

A.2.3 Performance by geographical region

The table below presents the general insurance underwriting result only by geographical region.

Underwriting performance by Geographical Region	UK & Ireland		Canada		Australia	
	2024 £'000	2023 £'000	2024 £'000	2023 £'000	2024 £'000	2023 £'000
Net Earned Premium	243,652	214,492	73,482	76,098	40,753	39,769
Net Claims Incurred	(87,357)	(93,058)	(22,593)	(27,209)	(18,449)	(21,474)
Operating Expenses	(133,388)	(97,924)	(36,572)	(34,857)	(26,824)	(25,233)
Underwriting Performance	**22,907**	**23,510**	**14,317**	**14,032**	**(4,520)**	**(6,938)**

UK & Ireland

In the UK and Ireland, financial year underwriting performance was £22.9m (2023: £23.5m), driven by an unusually benign year for weather claims and large losses and higher associated profit commission. Premium growth was driven by new business wins and retention levels. This now includes corporate costs as well, included elsewhere in 2023, which has caused the small drop from 2023, without this there would be significant gains.

Canada

Canada reported an underwriting performance of £14.3m (2023: £14.0m). This slight increase in profit was due to reduced claims, although the impact of several significant events, such as the Jasper Wildfire in July and the 'Western Deep Freeze' weather event in January still restricted this. Additionally, historic Physical and Sexual Abuse (PSA) reserves have been strengthened due to higher-than-expected development in prior-year claims.

Australia

The Australian business reported an underwriting performance loss for 2024, due to a fall in gross written premium, primarily driven by robust portfolio management, with lapses to exit poor-performing accounts, lower retention in SME and mid-market portfolios and a debt write-off.

The underwriting loss for the year has been impacted by several factors, including an adverse development in prior year liability claims and higher than expected historical physical and sexual abuse (PSA) claims. Current year performance has been encouraging, supported by favourable catastrophe experience and underwriting action over recent years. This has been partly offset by increased expenses, and a higher level of large losses in 2024.

A.3 Performance from investment activities

Investment performance by asset class

	Investment income			Fair value gains/(losses)		
	2024 £'000	2023 £'000	Change £'000	2024 £'000	2023 £'000	Change £'000
Debt	15,950	14,942	1,008	1,378	13,799	(12,421)
Equities	13,540	11,151	2,389	15,428	3,432	11,996
Property	8,749	8,665	84	2,831	(6,616)	9,447
Cash	3,926	3,258	668	-	-	-
Derivatives	-	-	-	6,877	4,262	2,615
Exchange	807	(864)	1,671	-	-	-
Other	4,861	5,556	(695)	(4,957)	(5,870)	913
Total investments	**47,833**	**42,708**	**5,125**	**21,557**	**9,007**	**12,550**

	Total return		
	2024 £'000	2023 £'000	Change £'000
Debt	17,328	28,741	(11,413)
Equities	28,968	14,583	14,385
Property	11,580	2,049	9,531
Cash	3,926	3,258	668
Derivatives	6,877	4,262	2,615
Exchange	807	(864)	1,671
Other	(96)	(314)	218
Total investments	**69,390**	**51,715**	**17,675**

Total investment return was a gain of £69.4m (2023: £51.7m gain) reflecting the improvement in equity markets in the period.

The result is driven by fair value gains, reflecting growth in the global investment markets (for example the FTSE 250 rose over 4% in the year). Annual revaluation of investment property gave rise to a £2.8m gain (2023: £6.6m loss).

The past year highlights the continued rise in equity market, however there are still geo-political tensions which has driven volatility throughout the year, as well as ensuring bond markets are not rising at the same rate. Notwithstanding this, the Group remains confident in its long-term investment philosophy, is well diversified and relatively defensively positioned.

A.3.1 Gains and losses recognised directly in equity

During the year, the Group designated certain derivatives as a hedge of its net investments in foreign subsidiaries and branches. These were recognised directly in equity and included in 'Gains/losses on currency translation differences' within section A.4. Investments in securitisation.

The Group has no material holdings in securitisations in the current or prior period.

A.4 Performance from other activities

Other activities	2024 £'000	2023 £'000	Change £'000
Gains/(losses) from non-insurance operations	(8,795)	(8,262)	(533)
Actuarial gains/(losses) on retirement plans	(1,078)	3,775	(4,853)
Gains/(losses) on currency translation differences	(1,897)	147	(2,044)

Note: Actuarial gains/(losses) on retirement plans and Gains/(losses) on currency translation differences are shown net of tax.

Non-insurance operations reported a loss before tax of £8.8m (2023: £8.3m loss). The overall return from non-insurance operations is lower than prior year primarily due to the asset management division. Whilst this division takes a long term approach to investing, it can be affected by short term volatility.

Actuarial gains or losses on retirement plans primarily relate to the Group's valuation of retirement benefit plans which includes the defined benefit pension scheme and post-retirement medical benefit scheme.

A.5 Any other information

There is no other material information to disclose regarding the Group and its performance during the reporting period.

B. System of governance

B.1 General information on the system of governance

B.1.1 Governing Body – Roles and segregation of responsibilities

The Governing Body of the Group is the Board of Directors (the Board). The Board's role is to provide leadership of the Group within a framework of prudent and effective controls which enables the risks which the Group faces to be assessed and managed. The Board sets the Group's high level strategic aims, ensuring that the necessary financial and human resources are in place for the Group to meet its objectives and reviews management performance. The Board sets the Group's values and standards and makes certain that the Group's obligations to Stakeholders are understood and met.

A formal schedule of matters reserved for the Board's decision is in place and includes strategy and management, structure and capital, financial reporting and controls, internal controls, contracts, communication, board membership and other appointments, remuneration, corporate governance, and policies.

Statutory Directors

The statutory Directors of the Board are the Non-Executive Directors (including the Chair) and the Executive Directors. They are responsible for providing strategic direction, governance and oversight to ensure the Group's success and sustainability.

Chair

The Chair's responsibilities include the active leadership of the Board, ensuring its effectiveness in all aspects of its role.

Group Chief Executive Officer (CEO)

The Group CEO is an Executive Director responsible for the day-to-day management of the business, ensuring delivery of, and reporting to the Board on, the implementation and execution of the strategy and long term objectives determined by the Board. The Group CEO derives his authority from the Board and may delegate any of his limits or authorities, but not responsibility.

Non-Executive Directors (NED)

The NEDs have a responsibility to uphold high standards of integrity and probity, including acting as both internal and external ambassadors of the Group. As part of their role, the NEDs should constructively challenge and help develop proposals on strategy.

Senior Independent Director (SID)

In addition to their other duties as a statutory Director and NED, the SID works closely with the Chair, acting as a sounding board, providing him with support in the delivery of his objectives. The SID serves as an intermediary for the other Directors where necessary. The SID is also responsible for leading the evaluation of the Chair, meeting with the non-executives at least once a year without the Chair present and being available to shareholders if they have concerns about the running of the Group which have not been resolved.

Executive Directors

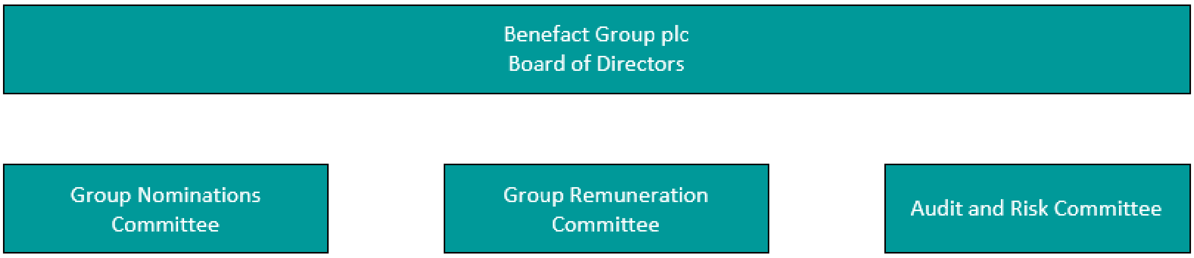
The Executive Directors are members of the Board. They are actively involved in the day-to-day management of the Group.

Company Secretary

The Company Secretary is an officer of the Group responsible for ensuring that Board procedures are complied with and regularly reviewed. The Company Secretary supports the Chair and assists the Board and its Committees to function efficiently. The Company Secretary reports to the Chair on governance matters. All Directors have access to the Company Secretary.

B.1.2 Delegation to committees

The Board has established three committees which support the discharge of its duties:



Each Committee operates at a Group level reporting to the Board on how they have discharged their responsibilities. They have agreed terms of reference, which set out requirements for membership, meeting administration, committee responsibilities and reporting. A high-level overview of each Committee's delegated responsibilities is summarised below:

Audit and Risk Committee

Comprising three independent NEDs as at 31 December 2024, its responsibilities include:

- scrutinising the financial statements and reviewing accounting policies and significant judgements and estimates;
- reviewing the content of financial reporting and advising the Board whether, taken as a whole, they are fair, balanced and understandable;
- reviewing the going concern basis of preparation of the financial statements and statements on viability for recommending to the Board;

- reviewing climate and non-financial metrics reporting;
- reviewing tax strategy and policies;
- reviewing the Group's whistleblowing arrangements;
- overseeing the Group's audit arrangements, both externally and internally;
- reviewing the effectiveness of the Group's systems of internal controls and the management of financial risks.
- overseeing the Group's Risk Management Framework including risk appetite and tolerance, and the Group's Risk and Compliance functions;
- reviewing conduct and prudential risk (including overseeing the Internal Model);
- considering the Group's exposure in managing financial risks to Climate Change.
- reviewing the Group's investment risk management policy;
- reviewing market risk appetites and board approved limits relating to investment strategy and the suitability of market risk and investment exposure; and
- reviewing the suitability of non-traded assets and managing valuation uncertainty.

Group Remuneration Committee

The Group Remuneration Committee is a joint committee of the BG and Ecclesiastical Insurance Office plc (EIO plc) Boards, comprising an independent NED from each Board and the Chair. The Committee assists the Board in ensuring that:

- remuneration policy and practices of the Group are designed to support strategy and promote long-term sustainable success, reward fairly and responsibly, be gender neutral and non-discriminatory, with a clear link to corporate and individual performance, having regard to statutory and regulatory requirements; and
- executive remuneration is aligned to company purpose and values and linked to delivery of the Group's long-term strategy.

This includes considering:

- remuneration policies, including base pay, long and short-term incentives and the use of the Committee's discretion;
- remuneration practice and its cost to the Group;
- recruitment, service contracts and severance policies;
- pension arrangements and other benefits;
- the engagement and independence of external remuneration advisers; and
- a review of workforce remuneration and related policies and the alignment of incentives and rewards with culture.

Group Nominations Committee

The Group Nominations Committee is a joint committee of the BG and EIO plc Boards, comprising an independent NED from each Board and the Chair. Its role is to ensure that there is an appropriate balance of skills, knowledge and experience on the Board, its committees and within the subsidiary companies.

B.1.3 Roles and responsibilities of key functions

The Governance Framework documents the main roles and responsibilities of key functions as set out below:

Group Internal Audit (GIA)

The Group Chief Internal Auditor provides independent assurance across the Group that the governance processes, management of risk and systems of internal control are adequate and effective to mitigate the most significant risks to the Group. The Group Chief Internal Auditor is accountable to the Chair of the Audit and Risk Committee.

Group Risk and Compliance Management

The Group Chief Risk and Compliance Officer is responsible for the Group level oversight of the prudent management of risk in relation to each Strategic Business Unit and a consolidated view of risk across the Group. This includes designing and recommending policies for risk appetite and tolerances to the Group Chief Executive Officer for agreement by the Board and ensuring that these are appropriately monitored.

In addition, Group Risk and Compliance provides assurance to the Board that the Group has adequate systems and controls in place which are sufficient to ensure compliance with its obligations under the regulatory system, associated risks, and for countering the risk that the Group might be used to further financial crime. It ensures that appropriate mechanisms exist to identify, assess and act upon new and emerging regulatory obligations and compliance risks that may impact on the Group.

Actuarial

Actuarial is accountable for all aspects of capital modelling, pricing and reserving across the Group and the independent Actuarial Function is responsible for providing opinions on the effectiveness of technical provision calculations, underwriting and pricing, and reinsurance purchase. Actuarial reports to the Group Chief Actuary who is accountable to the Group CEO. Further information is provided in section B.6 of this Report.

B.1.4 Material changes in the system of governance

In 2023, the Board restructured BG's businesses into three distinct divisions (Specialist Insurance, Asset Management and Broking and Advisory), each with a Divisional Holding Company. Following this restructure, the Board focussed on improving its independence from the EIO plc Board by moving away from a common directorship model.

During 2024, the BG and EIO plc Boards were refreshed enabling the BG Board to reduce in size (comprising a majority of independent non-executive directors) and focus on overseeing its businesses.

In addition, the Group Audit Committee, Group Risk Committee and Group Finance & Investment Committees (which were joint committees of the BG and EIO plc Boards) were disbanded and their duties reallocated. The Audit and Risk Committee of the BG Board was constituted and the EIO plc Board created an independent Audit Committee and a separate Risk Committee. The Group Nominations Committee and Group Remuneration Committee continue to operate as joint Committees of the BG and EIO plc Boards.

During 2024 the Board also implemented a new Governance Framework and supporting documents which applies to BG, its Divisional Holding Companies and, to the extent relevant, all SBUs.

B.1.5 Assessment of the adequacy of the system of governance

The Board, through the Audit and Risk Committee, annually reviews the adequacy of the system of governance on a holistic basis. The Board considers it is appropriate and effective based on the nature, scale and complexity of the risks inherent in the business.

In reviewing the effectiveness, the following are considered:

- outcomes from the Control Risk and Self-Assessment process (CRSA);
- outcomes from the Own Risk and Solvency Assessment (ORSA) process;
- relevant internal audit, risk assurance and compliance monitoring reports;
- reports from management;
- attestations from Strategic Business Units (SBUs) that they are materially compliant with the Governance Framework; and
- changes in regulation and legislation.

The Governance Framework is formally reviewed and approved by the Board.

The performance of the Board and its Committees is regularly reviewed and it is the Board's policy for its evaluations to be externally facilitated every two to three years. The most recent external evaluation was conducted in 2023. An external valuation is planned for 2026.

All directors receive an annual appraisal from the Chair. The Chair is appraised by the Board, in his absence, led by the Senior Independent Director. The Group Secretariat also facilitates evaluations based on bespoke questionnaires with outcomes considered by the Board and Committees.

The Group believes the size and composition of the Board gives it sufficient independence, balance and wider experience to consider the issues of strategy, performance, resources and standards of conduct. The strong representation of NEDs on the Board demonstrates its independence.

B.1.6 Remuneration policy

The Group's remuneration policy is aligned to delivery of the Group's strategic objectives and establishes a set of principles which underpin the Group's reward structures for all Group colleagues as follows:

- reward structures will promote the delivery of long-term sustainable returns, reflect and support the Group's underlying strategic goals and risk appetite, and are comprised of both financial and non-financial targets;
- reward will be performance-related, reflecting individual and business performance, including both what is delivered and the way in which results are achieved. However, the Group will adopt a prudent and considered approach when determining what portion of a colleague's package should be performance-linked and/or variable;
- reward structures will be straightforward and transparent for everyone to understand;
- remuneration packages will be set by reference to levels for comparable roles in comparable organisations. However, benchmark data will be only one of a number of factors that will determine remuneration packages;

- reward structures will deliver an appropriate balance of fixed to variable pay in order to foster a performance culture, with the proportion of 'at risk' pay typically increasing with seniority. However, high levels of leverage are not appropriate for the Group;
- reward structures will achieve a balance between short and long-term incentives. The balance between short and long-term incentive pay is largely driven by role and seniority, with generally a greater contribution to reward provided by long-term incentives for more senior colleagues;
- the Group is committed to ensuring that all colleagues have a fair and equal pay opportunity appropriate to their role;
- the Group will strive to adhere to the highest standards of remuneration-related regulatory compliance and best practice guidelines, while ensuring that the Group's remuneration policies are appropriately tailored to its circumstances, challenges and strategic goals; and
- the Group holds itself to the high standards of corporate behaviour as a trusted, ethical and socially responsible business and is mindful of the need to maintain and build on these standards, and to avoid risk of negative publicity or reputational damage to the Group and its charitable owner through the implementation of its remuneration policy.

B.1.7 Entitlement to share options, shares or variable components of remuneration

The elements of variable remuneration are delivered in the following ways:

Cash annual bonus

A proportion of variable remuneration is delivered in the form of a cash annual bonus which is paid to participants following the end of the financial year. Annual bonuses are subject to a range of challenging financial and non-financial performance conditions linked to key strategic priorities.

Awards for senior management roles and colleagues within the asset management function are subject to deferral, providing alignment with shareholder interests and promoting retention.

Cash Long-Term Incentive Plans (LTIP)

For some senior management roles, a proportion of variable remuneration is delivered in the form of an LTIP. LTIPs are designed to incentivise the achievement of the Group's long-term objectives.

Cash awards under the relevant LTIP vest dependent on the Group Remuneration Committee's assessment of performance against the scheme's performance conditions over the relevant three-year performance period.

B.1.8 Supplementary pension or early retirement schemes for the members of the board and other key function holders

UK-based executive directors and key function holders are eligible to participate in the Group Personal Pension (GPP) plan. Contributions are made by the colleagues and employer. Any contributions to the UK Defined Contribution Scheme that are above the annual or lifetime earnings limit are paid in cash, net of National Insurance contributions charge.

Early retirement is permitted within the UK Defined Contribution scheme based on the colleague's GPP fund value at the date of early retirement.

Where a colleague is eligible to retire early, the pension entitlement will be calculated subject to the scheme rules and no enhanced early retirement terms will apply without Board approval other than those applicable in general under the scheme rules.

NEDs are not eligible to participate in pension plans.

B.1.9 Material transactions during the reporting period with shareholders, persons who exercise a significant influence, and with members of the board

No contract of significance existed during or at the end of the financial year in which a director was or is materially interested.

B.2 Fit and proper requirements

B.2.1 Skills, knowledge and expertise requirements

The Group is committed to ensuring that all fit and proper regulatory requirements are met for its senior leaders within the Senior Managers and Certification Regime (SM&CR).

The PRA and Financial Conduct Authority (FCA) consider that the most important factors in assessing an individual's fitness and propriety are:

- Honesty, integrity and reputation;
- Competence and capability; and
- Financial soundness.

In order to initially determine fitness and propriety all prospective senior role holders take part in a multistage interview process, supported by psychometric testing, involving relevant stakeholders. The candidates' knowledge, experience and qualifications in such areas as market knowledge, business strategy, financial analysis, working within regulated frameworks and governance/risk management are fully explored. Due diligence is fulfilled through pre-employment checks and referencing that are carried out upon an offer being accepted.

B.2.2 Ensuring ongoing fitness and propriety

Ongoing adherence to these standards is assessed through performance review cycles and is subject to further confirmation through an annual fit and proper process, carried out for all individuals caught within the SM&CR, covering:

- competence and performance in carrying out the documented responsibilities of the role;
- CPD and training to maintain knowledge and skills;
- completion of regular mandatory company training;
- disclosure and barring criminal records and credit checks; and
- self-assessment against fitness and proprietary questions.

Where the Group becomes aware of concerns regarding the fitness and propriety of a person in a relevant role it will investigate and take appropriate action without delay in line with the Fitness and Propriety policy. The regulator will be notified of any action where necessary.

B.3 Risk management system including the ORSA

B.3.1 Overview of the risk management system

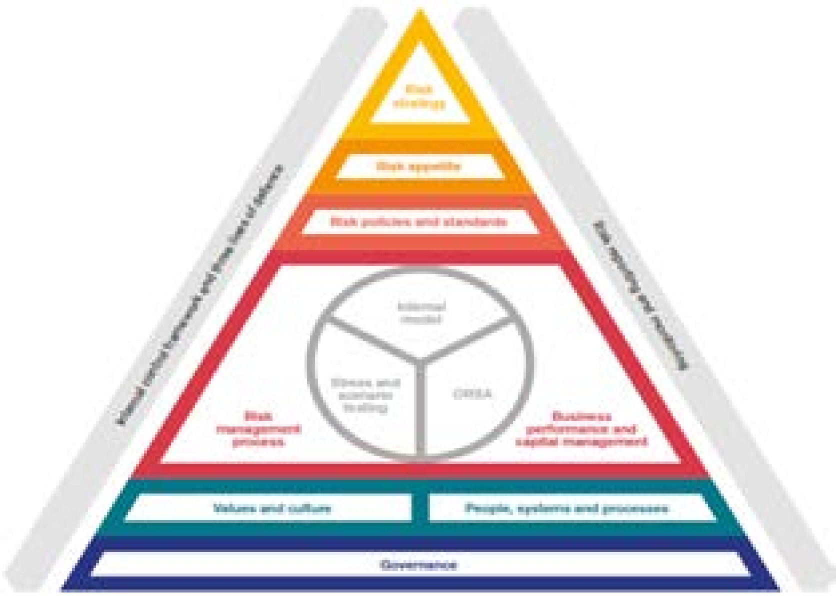
An enterprise-wide risk management framework is embedded across the Group with the purpose of providing the tools, guidance, policies, standards and defining responsibilities to enable both BG and its divisional entities to achieve its strategy and objectives.

The risk management framework is owned by the Board with day to day responsibility for facilitation of the implementation and oversight delegated to the Group Risk Function, led by the Chief Risk & Compliance Officer.

Regulatory requirements for risk management are complied with at all times and are regarded as the minimum standards for BG's enterprise risk management system. BG recognises that there are a number of risks that it faces that could impact on the achievement of its strategy and is therefore committed to the effective identification, assessment and, where appropriate, mitigation of those risks.

On an annual basis the Board carries out a formal review of the key risks with input from the Risk Committee, GMB, SBUs and Central Functions and allocates responsibility for each one to an individual member of the executive management.

Monitoring of the key risks is undertaken quarterly including a review of the progress of risk management actions and challenge of any gaps in risk mitigants. This quarterly review includes consideration of any emerging risks. There is a continuous and evolving approach to enterprise risk management and emerging experience is used to refine this. The risk management framework is reflected below:



B.3.2 Effectiveness of identifying and managing risks

BG's risk management framework is designed to help ensure that the significant risk exposures to BG both individually and in aggregate, can be effectively identified, measured, monitored, managed and reported upon.

The primary tools and processes for achieving this are outlined below:

Risk Appetite

The Board has established its approach for setting a risk appetite. This focuses on the material risk areas and establishes the risk taking capacity of the Group. BG's divisional entities develop and maintain their own risk appetite limits, which are aligned to that of the overall BG risk appetite.

Quarterly monitoring of compliance with the Group risk appetite is prepared by the Group Risk function and the outputs reported to the Risk Committee.

Structured Business Risk Reviews

Regular risk reviews are conducted by using the defined risk management processes to formally identify, assess and record the most significant risks to BG's objectives. Details of these risks are recorded within a risk register which also notes the mitigations or other responses agreed to appropriately manage risk exposures and report to relevant stakeholders across the organisation. The risk register is a living document that is updated on an ongoing basis to reflect changes. The Group Risk Function facilitates this process and provides the methodology and tools to ensure consistency in approach across all business units.

Loss and Near Miss Process

An incident reporting process is in place across BG and its divisional entities which captures risk losses and near-misses. which facilitates the identification, recording and analysis of instances where costs (both financial and non-financial) have been incurred, or could have been incurred or reputational damage suffered, due to the realisation of al loss event or process or control failure. The outputs from this analysis are regularly reviewed and used to drive improvements in the internal controls.

Risk Reporting

Regular reporting to the Risk Committee is completed. Risk reporting provides details of those risk exposures directly to BG that has the potential to affect its ability to achieve its overall objectives. In addition, reporting also considers those risks reported at a divisional entity level that could have an adverse impact on BGs ability to achieve its objectives.

Emerging Risk Process

Emerging risk identification is undertaken at all levels of the organisation. This is considered as part of all business unit risk reviews and by all risk oversight committees. The assessment made at risk review meetings helps to determine the nature of any actions resulting, which may include, for example, continued monitoring, a deep dive analysis of the risk, or stress and scenario testing of the risk to better understand the range of potential impacts. Emerging risks, particularly those with the potential to have a material impact on the Group are highlighted to the Risk Committee as part of the regular reporting.

Risk Framework Reviews

The adequacy and effectiveness of the Risk Management Framework is reviewed on an annual basis by Group Risk. The main vehicle for this is the CRSA process, supported by the GIA function's risk-based audit programme. This may be supplemented by focused reviews by the Group Risk function or by external parties when deemed appropriate by management or the Board.

The Board also uses the ORSA process as a tool to assess the effectiveness of the system of governance and risk management.

B.3.3 Implementation of the risk management function

The key to the success of the risk management process is the deployment of a strong Three Lines of Defence Model whereby:

- *1st Line (Business Management)* is responsible for strategy execution, performance identification and management of risks and the application of appropriate controls;
- *2nd Line (Reporting, Oversight and Guidance)* led by the Chief Risk & Compliance Officer, is responsible for assisting the Board in formulation of risk appetite, establishment of minimum standards, developing appropriate risk management tools, providing oversight and challenge of risk profiles and risk management activities within each of the business units and providing risk reporting to executive management and the Board; and the
- *3rd Line (Assurance)* provides independent and objective assurance of the effectiveness of the Group's systems of internal control. This activity principally comprises the internal audit function, which is subject to oversight and challenge by the Audit Committee.

There are a number of key roles and responsibilities with regards to the effective operation and integration of the Group Risk Management Framework:

Role	Responsibilities
The Board	Own the risk management framework and are responsible for its implementation, ensuring that they are aware of the Group's risk profile, the most significant risks, and that adequate and appropriate actions are in place in response.
Risk Committee (RC)	Responsible for making recommendations to the Board on risk management strategy, risk appetite and other key risk management elements. They review the effectiveness of the Group's risk management framework on behalf of the Board.
Executive Risk Committees (First Line of Defence)	Responsible for the oversight of the most significant risks, including overseeing cross SBU risks and ensuring that coordinated organisation-wide responses are in place.

Role	Responsibilities
Group Risk Function (Second Line of Defence)	Provide oversight, challenge, expert advice, and propose standards and guidance to ensure a consistent and robust approach to risk management across the organisation. Facilitates the consistent implementation and application of the risk management framework by providing the tools, training and support to all levels of the business so stakeholders can effectively discharge their responsibilities.
Internal Audit (3rd Line of Defence)	Provide independent assurance over the design and operational effectiveness of the risk management framework.

B.3.4 Consistency of implementation across the Group

As described above the risk management framework has been embedded across the Group Risk function work with all divisional entities within the Group to ensure that the framework is embedded consistently

Divisional entities are responsible for the day to day management of their businesses whilst ensuring the requirements of BGs risk framework are met.

All divisional entities are required to update Group Risk and Audit functions immediately, pro-actively and openly on:

- any significant regulatory or legislative developments, and related implementation plans;
- any material change in the SBU's staffing or resourcing of its risk management framework, compliance function or both;
- any internal or external fraud, suspected fraud or financial crime;
- any actual or potential breaches of risk appetite or matters giving rise to reputational risk;
- any unplanned regulatory interventions, sanctions, breaches or failure to meet local regulatory requirements;
- any planned regulatory visits or any significant or material correspondence from any regulator;
- any breaches of capital requirements;
- any loss/near miss events; and
- progress on action plans to remedy the above.

B.3.5 Election to undertake a single Group ORSA report

The ORSA process is carried out at the level of the Group, as permitted by the PRA Rulebook.

One single ORSA report is completed incorporating both BG and EIO as approved by the PRA.

B.3.6 Own risk and solvency assessment process

The objective of the ORSA process is to demonstrate that BG has, or can access, the necessary resources and capital to carry out its corporate strategy and business plan in the context of risk policy, risk appetite, a forward looking assessment of risks, the potential for stress and the quality of its risk management environment.

BG maintains an ORSA policy framework to regulate and manage the ORSA process. The ORSA combines the Group's underlying risk and capital management processes, looking forward over the period of the business plan in order to:

- assess the liquidity, funding, capital and other critical resources required to execute the business plan;
- assess the adequacy of the risk management environment to support the business plan in the context of a forward-looking assessment of risks, the potential for stress and risk management policy; and
- demonstrate that the Group has, or the extent to which it is likely to have, access to the financial, capital and other critical resources required to deliver the business plan.

Preparation of the ORSA report is coordinated by the Group Risk function in accordance with ORSA policy, Process and Standards & Guidance.

B.3.7 Frequency of review

BG performs a full ORSA at least annually, covering the solvency position at the reference date 31st December. The annual frequency is deemed sufficient for carrying out a full ORSA due to the stable nature of the business model, maturity of the risk framework and surplus capital held. However, the ORSA may be re-run, either in full or partially, in accordance with several pre-defined ORSA triggers that are defined and monitored to identify events that could significantly impact business decision making.

Each ORSA report is reviewed and approved by RC, who make a recommendation for final approval by the Board. The Board take an active role in the ORSA, primarily through the actions of the RC, particularly in the forward-looking assessment of risk. The most recent ORSA Report was approved by the Board in June 2024.

Key ORSA metrics are updated quarterly on an approximate basis and an update provided to the Board and RC within the Group Chief Risk and Compliance Officer Report.

B.3.8 Determination of own solvency needs

The ORSA process integrates the Group's risk management, business planning and capital management activities. Key steps in the process are:

- maintaining the risk management framework that is used as a context for business planning;
- assessment of the current risk profile of the business and ensuring adherence to risk appetite;
- a forward-looking risk assessment, including analysis of emerging risks;

- a business plan for the chosen time horizon that has been derived with reference to the risk appetite, the risk profile of the business and optimal use of capital;
- identification of the impact of the proposed business plan on the risk profile of the business;
- a stress testing and scenario analysis framework, including reverse stress testing, with assessment in context of the proposed business plan;
- assessment of the capital required to carry out the business plan, particularly the own funds necessary to meet regulatory and internally assessed capital requirements;
- assessment of the risk profile in comparison to the assumptions underlying the calculation of the regulatory capital requirements;
- consideration of how capital shortfall might be addressed and the likelihood of success; and,
- assessment of the adequacy and quality of the risk management environment.

B.4 Internal control system

B.4.1 Internal control system

The system of internal control is implemented by the Board and ensures that the Group is managed efficiently and effectively, with appropriate policies and business processes designed and implemented to help ensure that the business objectives are achieved, and that risks are managed in line with the risk appetite and risk framework.

The control framework requires the establishment of controls to meet the following key objectives:

- delivery of business strategy and objectives: supporting the effectiveness and efficiency of operations and core processes;
- reliability of financial reporting: to ensure the reliability, accuracy and quality of financial information, and to mitigate the risk that inaccurate management information is used to make business decisions or is reported externally;
- internal model: to ensure the overall accuracy of the SCR calculation and to ensure the quality of model outputs used for decision-making;
- compliance with applicable laws and regulations: to ensure that there is compliance with all relevant regulatory and legal requirements, and to external standards which the Group complies with;
- reputation: to ensure that the whole system of control is designed in such a way as to ensure the Group operates to the ethical standards established by the Board, thereby protecting the Group's reputation with customers, regulators, investors and other external parties; and
- customer: to ensure that the Group provides the products and services that customers value and trust while delivering fair customer outcomes.

BG's control framework comprises the following elements:

- *control environment:* a business culture that recognises the importance of systems of control whereby senior management establish the operational environment to maintain effective controls, ensuring there are adequate resources to operate the control framework to required standards;

- *objective setting:* management has in place a process to set objectives which support and align with BG's mission and that are consistent with risk appetite;
- *risk assessment:* Internal and external events that affect the achievement of business objectives are identified, distinguishing between risks and opportunities. Risks are analysed, with appropriate risk responses selected by the RC and Board. Where appropriate, actions are developed to align risks with the Group's risk tolerance and appetite;
- *control standards:* a policy framework that establishes the Board minimum standards for the mitigation of risk within the stated appetite;
- *control activities:* business processes that include control activities designed to mitigate risks to the level required to meet the control objectives;
- *monitoring activities:* establish and maintain periodic and regular monitoring of controls aligned to their materiality, to ensure that they are fit for purpose both in design and in operation. This includes monitoring of individual controls by business owners and oversight and assurance activities undertaken by second and third line functions (Risk, Compliance and Internal Audit);
- *training and communication:* effective communication of required control standards and adequate training to ensure those operating or monitoring controls can do so effectively;
- *recording:* certain controls are documented to ensure the process could be replicated if required, and a person undertaking monitoring or oversight could understand the design and intended operation of the control; and
- *reporting:* open and complete reporting of material control effectiveness to allow appropriate decision-makers to understand whether control objectives are being met and whether actions need to be taken to strengthen the control environment, which could include removing ineffective or inefficient controls as well as adding new ones.

B.4.2 Compliance function

Benefact Group plc is a parent company of the companies that make up the Group and is itself not regulated by the Financial Conduct Authority or the Prudential Regulation Authority. Separate legal and regulated entities sit with Benefact Group and their compliance arrangements can be found in their individual SFCRs.

B.5 Internal audit function

B.5.1 Implementation of the internal audit function

GIA receives its authority from the Audit and Risk Committee (BG ARC), which is a Committee of the Board of the Group established to, amongst other things; review the work of the internal auditors of the Group to evaluate the adequacy and effectiveness of the Group's financial, operating, compliance, and risk management controls.

Adequate and effective risk management, internal control, and governance processes reduce but cannot eliminate the possibility of poor judgement in decision making, human error, control processes being deliberately circumvented by employees and others, management overriding controls, and the occurrence of unforeseeable circumstances.

Adequate and effective risk management, internal control, and governance processes therefore provide reasonable, but not absolute, assurance that the Group will not be hindered in achieving its business objectives, or in the orderly and legitimate conduct of its business.

GIA maintains a professional audit team with sufficient knowledge, skills, experience and professional qualifications. Where specialist, technical support is necessary to supplement GIA resource, this is available through a co-sourcing contract with an external specialist company, ensuring that GIA has immediate access to specialist skills where required. GIA confirms to the BG ARC that the Core Principles for the Professional Practice of Internal Auditing, the Code of Ethics, the International Standards for the Professional Practice of Internal Auditing and the Definition of Internal Auditing are complied with.

GIA operates within the Group's three lines model. In order to operate an effective framework GIA maintains regular and ongoing dialogue with the first and second line functions to maintain a current and timely perspective of business direction and issues.

Demarcation between the third line and the first two lines must be preserved to enable GIA to provide an independent overview to BG ARC and the Board on the effectiveness of all risk management and assurance processes within the organisation. Any blurring of the roles of the three lines should be exceptional and any such blurring must be approved by the BG ARC.

The GIA methodology provides a series of different assurance responses to a variety of scenarios to give the stakeholders the best assurance for the time GIA spends in an area as follows:

- *risk-based internal audits* - GIA's standard audit response, the methodology will also be used to respond to most management requests for assurance and focuses on assessing the adequacy and effectiveness of key controls mitigating significant risks.

There are three categories of risk-based audit:

Full Audit	An extensive audit that will usually cover a wide-ranging scope or a deep dive scope; typically this would be an end-to-end process requiring walkthroughs, site/team visits.
Focused Scope	A shorter focused review, covering a small suite of key controls within a specific control theme or process. This should entail less walkthrough and site visits; and can usually be completed remotely or with reduced interaction with the business area being audited.
Rudimentary	An audit with a very limited or undefined scope but carried out with regard to a basic set of auditing principles: i.e. no opinions presented without evidence and all work is peer reviewed prior to finalising reporting. Scope can focus on developing areas of control and enables "state of the nation" opinion to also be given.

- *programme & project assurance* - A series of risk-based assurance responses to programmes and projects. This differs from standard risk-based audits in that it focuses on the commercial aspects of the programme, such as benefits realisation as well as on key controls;
- *close and continuous* - This will involve GIA having regular meetings with key stakeholders and attending decision making forums as appropriate. It will also include ongoing assessment of key documents as they are produced. Any concerns will be raised with management at an early stage to allow the programme to address them in a timely manner; and
- *consultancy* - Completing a piece of ad-hoc work for management, usually around the development of controls in a specialised area. Such work may be characterised by the need to formally contract with the business to assist in control development. GIA will rarely perform these pieces of work as they potentially compromise their independence.

The above are communicated through the following methods:

- *reporting to the BG ARC* - Quarterly reporting is provided to the BG ARC, where the Group Chief Internal Auditor attends BG ARC meetings to summarise the output within the reporting period and provide an opinion on a number of key risk themes; and
- *internal audit reports* - In addition to the audit client, internal audit reports are issued to all executive management and members of the GMB and the external auditor. Reporting of issues focuses on describing the control breakdown or failure, who was responsible and the risk that has materialised or could potentially materialise.

In response to the issues raised by GIA, management is required to document the steps they are taking to address the issue, provide a realistic timescale and, importantly, the action is assigned a single owner to enhance accountability.

B.5.2 Independence of the internal audit function

To ensure the independence of GIA, the GCIA will report functionally to the BG ARC Chair and administratively (for example, day-to-day operations) to the Group CEO and has access to the Chair of the Group Board.

Financial independence, essential to the effectiveness of internal auditing, is provided by the BG ARC approving a budget to allow GIA to meet the requirements stated above.

GIA is functionally independent from the activities audited and the day-to-day internal control processes of the organisation and is therefore able to conduct assignments on its own initiative, with free and unfettered access to people and information, in respect of any relevant department, establishment or function of the organisation, including the activities of branches and subsidiaries and outsourced activities.

Where it is identified by data owners that information should be redacted before being provided to members of the GIA team, the redacted information will be reviewed by the Group Chief Internal Auditor to ensure that the redaction is appropriate and does not constitute a restriction of scope. In the event that the redacted data relates directly to the Group Chief Internal Auditor, or the GIA team, the Chair of the BG ARC will review the redactions and confirm (or otherwise) to the Group Chief Internal Auditor whether the redactions are appropriate.

The Group Chief Internal Auditor and staff of GIA are not authorised to perform any operational duties for the Group or direct the activities of any employee not employed by GIA.

B.6 Actuarial function

B.6.1 Implementation of actuarial function

The delivery of the operations of the Actuarial Function, incorporating pricing, reserving and capital management are the responsibility of the Group Chief Actuary, who is an experienced qualified actuary, holding an Institute of Actuaries Chief Actuary certificate. The Group Chief Actuary also held the position of Acting Group CFO from 1 July 2024 to end of year. From 1 January 2025, he has taken on the permanent role of Group CFO, but retained the role as the Head of the Actuarial Function (SMF20) for the Group whilst a replacement was recruited for.

The responsibility of the Group Chief Actuary includes, but is not limited to:

- the deliveries of the Group Reserving team including the co-ordination and production of technical provisions (TPs) and International Financial Reporting Standards (IFRS) reserves;
- the development, maintenance and use of the Group Capital Model to manage the overall internal capital requirements of the business and to assist senior management in key business decisions across the Group, including the business planning process, optimisation of reinsurance strategy and optimising the use of capital; and
- the deliveries of the Pricing team, ensuring the development of appropriate pricing models exist within the Group.

In order to provide the Board with an independent opinion over the deliverables of the actuarial function, the Group has an Actuarial Function Director, who is an experienced qualified actuary, holding an Institute of Actuaries Chief Actuary certificate. The Actuarial Function Director uses other actuarial and appropriately experienced resources to discharge his responsibilities, ensuring an appropriate level of independence between those carrying out activities and those reviewing work.

The Actuarial Function Director’s key areas of responsibility are:

- the provision of oversight of the calculation of the TPs, ensuring appropriateness of data, assumptions, methodologies and underlying models used;
- to give an opinion on the TPs to the Board, including assessing the sufficiency and quality of the data used, informing the Board of the reliability and adequacy of the calculation and comparing best estimates to experience;
- to give an opinion on the adequacy of pricing and underwriting to the Board;
- to give an opinion on the adequacy of reinsurance arrangements to the Board as an efficient means to manage risk;
- to contribute to the technical framework, governance and use of the internal capital model; and

- to contribute to the effective implementation of the risk management system.

B.7 Outsourcing

B.7.1 Outsourcing policy

The Group's Outsourcing Policy is to outsource services on an exceptional basis. Outsourcing is considered as an option when reviewing the operational effectiveness and business requirements of meeting the needs of our customers and whether these can be better delivered from outside the organisation using specialist providers. Outsourcing will always be subject to the services maintaining the integrity of the Group's compliance with regulatory obligations and not increasing the Group's exposure to operational risk.

The Group remains responsible and accountable for any activities it has outsourced and operates a defined framework for supplier selection and management that includes risk assessing the services, conducting regular and appropriate due diligence, and managing the supplier relationship and performance along with any exit/contingency planning, audits and testing required.

Comprehensive written contracts are entered into with accountability for managing the delivery of the services assigned to an individual manager within the Group along with a senior executive as ultimate owner. Exit and contingency plans are documented and are reviewed on a frequent basis to ensure they remain appropriate.

B.7.2 Outsourcing of critical or important functions or activities

The Group has outsourced services in respect of the provision of legal expense handling, delegated claims handling, off-site document storage, print management, IT infrastructure support and datacentre co-location. The Group does not have any contracts with third parties to deliver services.

The Group's investment management activity is outsourced to a subsidiary company, EdenTree Investment Management Limited, with a comprehensive investment management agreement in place. The Group and EdenTree Investment Management outsource Trustee services and Custodian and Dealing services.

Outsource providers predominantly operate from within the United Kingdom.

B.7.3 Intra-group sourcing

The Group's investment management activity is outsourced to a subsidiary company, as explained above in section B.7.2.

B.8 Any other information

In 2024, focus has been on reshaping the Boards of EIO and the Group to increase the independence of EIO. A number of directors have been asked to resign from the BG Board to reduce commonality of membership. In March 2024, S. Jacinta Whyte and Neil Maidment stepped down from the Board accordingly.

C. Risk profile

C.1 Underwriting risk

C.1.1 Risk exposure

Solvency Capital Requirement Underwriting risk	2024	2023
	£'000	£'000
Premium risk	140,386	137,748
Reserving risk	75,700	78,593
Diversification	(56,792)	(54,537)
Non-life underwriting risk	**159,294**	**161,804**
Life underwriting risk	**2,869**	**2,009**

BG is directly impacted by Underwriting risk through Ecclesiastical Insurance Office (EIO) and Ecclesiastical Life Limited (ELL).

General Business

The elements of the Group's non-life underwriting risk are:

- *Premium risk* – the risk that premiums relating to future accident years will be insufficient to cover all liabilities arising from that business as a result of fluctuations in frequency and severity of claims, timing of claim settlements or adverse levels of expenses. This includes catastrophe risk which is the risk of financial loss relating to future accident years, arising from net of reinsurance claims generated by catastrophic events; and
- *Reserving risk* – the risk of adverse change in the value of underwriting liabilities relating to outstanding claims from prior accident years, arising from differences in the timing and amount of claims settlements and related expenses from those assumed in the best estimate reserves.

Premium risk

The underwriting risk for EIO and therefore BG is related to future accident years being heavily influenced by property exposure, including catastrophe risk. Despite catastrophe risk being mitigated by a robust and effective reinsurance programme, exposure remains to significant residual risk including the potential risk of aggregation (a number of small events), spanning several perils or territories, and the potential costs of reinstating cover.

The main peril to EIO and therefore BG for catastrophe underwriting risk is UK windstorm and storm surge. A significant proportion of the property portfolio is in the faith and education niches, where the traditional nature of construction for most of the buildings insured is such that they are built to withstand the normal type of storm activity seen in the UK. Many have undergone a significant amount of renovation and repair work following the material weather events of 1987 and 1990. In other territories, earthquake is the main peril for catastrophe underwriting risk (as detailed below for Canada and Australia).

Aside from non-catastrophe events, the potential for an underwriting risk scenario is relatively low, particularly taking into account the reinsurance structure in place. Nevertheless, the non-catastrophe underwriting result can cause significant volatility arising from substantial levels of attritional or large claims. This can materially worsen the result in less extreme outcomes, particularly due to the effect of certain risks that benefit less from reinsurance cover. Other key underwriting risks include poor premium rates, poor weather experience and the occurrence of multiple large property losses.

EIO uses various measures to assess its exposure to underwriting risks, in particular regular and ad-hoc MI, and modelling including scenarios and reverse stress testing.

Reserving risk

Reserving risk is the risk of future claims payments exceeding the amounts held in claims reserves and may emerge at any time until final claim settlement, so can be long-term in nature, particularly for liability business. The ORSA is carried out on an ultimate basis, including allowance for all future deterioration of experience.

Latent reserving risk (such as latent and asbestosis claims) has a high level of uncertainty, particularly relating to volumes of future claims arising from historic periods of exposure, giving potential to affect the future profits and capital position, though conversely it might give releases to enhance profits. Exposure to latent liability claims is a distinctive feature of the EIO and therefore BG's risk profile, which arises primarily from historic coverage of the core church book.

Non-latent reserves represents a relatively lower risk due to the nature of the claims and the mix of business, which helps diversify the risk of deterioration in its run-off. Long-tail liability covers present a higher reserving risk than shorter-tail property classes.

Regular monitoring and review processes are in place to assess reserving risks, such as actual versus projected claims analyses and assessment of incurred claim volumes.

Life Business

ELL recommenced writing new business from August 2021. The policies being written are again whole of life assurance associated with funeral plans, though these are unit-linked with a guarantee. Nearly all of the policies pay a benefit on death of the life assured to provide payment for a funeral.

ELL and therefore BG is exposed to life business underwriting risk albeit only a limited level. The reserve held for each of those policies is in excess of the current benefit levels. As benefit amounts increase with inflation there is a risk that the population of lives assured survive longer than assumed in the reserving calculations and that an inflation linked return cannot be achieved on the assets backing the reserves held, albeit only a limited level.

The risk exposure is measured as part of the ongoing process of valuation of EIO's liabilities and the mortality experience of the portfolio is investigated annually.

C.1.2 Risk concentration

General Business

As a specialist expert insurer, EIO predominantly writes predominately property and casualty business concentrated in a small number of clearly defined niches. The focus on certain niches, specifically faith and education, gives rise to a concentration in respect of claim risks.

Geographical concentrations arise through operations focused in the territories in which underwriting operations are based. The majority of the risks insured by EIO are located in the UK.

Concentrations arising in high-risk natural hazard zones can arise overseas although these are carefully monitored. For example, specific attention is given to exposure in British Columbia and Quebec West/Eastern Ontario in view of the earthquake risk associated with these locations.

Life business

All policies have been underwritten in the UK on lives of older UK residents, but there is no identified further concentration of risk.

C.1.3 Risk mitigation

General business

Reinsurance is a key tool for EIO in mitigating underwriting risk. Risk measurement and sophisticated modelling and analysis are used to establish the impact and value of reinsurance. Reinsurance programmes are then arranged at both local and EIO group levels. Global reinsurance relationships are developed strategically and transparently and are overseen by the Group Reinsurance Board which approves all strategic reinsurance decisions.

Accumulation of property underwriting risk in a single area is tracked using mapping software supplied by EIO’s reinsurance brokers. Referral to senior management is necessary to increase exposure in defined areas where the largest concentrations of risk have been identified.

Underwriting and reserving policies and procedures, and risk appetite statements are in place at EIO Group and subsidiary and branch level to limit underwriting risk concentrations. There are also Centres of Excellence which aim to disseminate best practice and ensure a consistency of approach across the EIO Group where appropriate.

EIO has an Insurance Risk Committee, chaired by the Group Underwriting Director, which is responsible for the oversight of the non-life underwriting risks of the Group. The Insurance Risk Committee reports regularly to the RC, which provides challenge on the management of underwriting risks and monitors overall risk exposure. There are also additional bodies such as the Catastrophe Risk Management Group, which carries out close oversight of the catastrophe model outputs; the PSA Governance Committee, which oversees PSA claims and the PSA reserving model; and a Group Reserving Committee which oversees the setting of reserves prior to EIO Board approval.

Issues for escalation are also raised through BGs governance mechanisms, through regular reporting via the risk committees and the Board.

Life business

This risk has overlaps with market risk as it relates to reinvestment risk in the event of increased longevity. The primary technique for mitigating this risk is to match assets to expected duration of payment. This position is monitored at least annually by the Actuarial Function who also monitor the wider population's experience to ensure that reserving assumptions remain appropriate. Policies written since reopening to new business have no material underwriting risk.

C.1.4 Risk sensitivity

Various stresses and scenarios are considered. These are detailed in Section C.7.

C.2 Market risk

Market risk exposure

Market risk is the risk that the Group is adversely affected by movements in the value of its financial assets arising from a change in interest rates, equity and property prices, credit spreads or foreign exchange rates.

EIO and therefore BG are exposed to the following market risks :

- *equity risk* - this represents the largest market risk for EIO, arising from exposure to global equity investments;
- *property risk* - arising primarily from direct investment in a portfolio of commercial property in the United Kingdom, the risks are a fall in market value of the property and voids in rental income;
- *interest rate risk* – while liabilities are generally well matched by duration with fixed-interest stocks, there is a risk of falls in value of stocks held in surplus funds in the event of rises in interest rates;
- *spread risk* - arising from the possibility of deterioration in the credit rating of corporate bonds or changes in market spreads of corporate bond yields over risk-free rates;
- *credit risk (bond default)* - arising from the possibility of default of corporate bonds; and
- *currency risk* - arising from investment in overseas equities in order to provide diversification and gain from opportunities in different economies and from the value of surplus assets held in overseas operations.

In addition to exposure to market risks from its own assets, EIO are exposed to market risks through a defined benefit pension scheme. Within the pension scheme, the main risk exposures arising are equity risk, property risk, interest rate risk, spread risk, currency risk and inflation risk.

The following table provides a quantitative overview of the Group's level of exposure to market risk:

Solvency Capital Requirement Market risk	2024	2023
	£'000	£'000
Market risk - excluding pension assets	174,984	181,188
Market risk - pension assets	26,598	49,433
Diversification	(2,811)	(1,755)
Market risk	**198,771**	**228,866**

C.2.1 Compliance with prudent person principle

EIO sets out a mandate to its investment managers which is aligned to Risk appetite of EIO and that of BG. The mandate specifies the types of assets that it wishes to invest in. This only permits acquiring assets where risks are well understood and does not allow complex asset structures. Regular investment risk reports are provided from the asset managers that enable the Group to fully understand the risks in the assets.

The investment strategy aligns to the Board's group risk appetite and the Group's investment risk and return objectives. Limits are placed on the proportions of assets that can be invested in the various asset classes, countries and industry sectors, exposure to single counterparties, and quality of issuers. These limits are tracked regularly. No investments in non-standard assets are permitted without approval by the Market and Investment Risk Committee (MIREM) of the Board.

Assets to cover all liabilities and any local capital requirements are held in the relevant matching currencies and held in those countries. The assets are managed so that a notional portfolio backing technical provisions is held which has appropriate cash flows to match those of the liabilities.

Derivatives held over the reporting period have been used only for the purpose of management of risk exposures for both equity risk and currency risk.

All investment risk exposures are monitored regularly, and are overseen by the Group Market and Investment Executive Meeting, which provides reports to the RC and the MIREM.

C.2.2 Market risk concentration

The largest single investment for both EIO and BG is a holding in shares of Mapfre Re, representing 8% of total investments. Otherwise, the largest exposures are to government debt in the territories in which the Group operates. Overall, the majority of market risk exposure is located in the UK. There are no other material concentrations of market risk as the portfolio is well diversified.

C.2.3 Market risk mitigation

EIO did not hold any put options in the year. When required, regular investment performance and risk reports provide information enabling assessment of the effectiveness of derivative holdings.

Interest rate risk is partially mitigated by holding assets of appropriate duration to back some of the technical provisions so that in the event of changes in market yields, resultant movements in liability discount rates will ensure that relevant asset values and liability values move in the same direction, so mitigating the net overall impact. The matching cash flow position is monitored regularly and reviewed as part of the investment strategy review each year, with adjustments made as determined to be appropriate.

Interest rate and inflation risks are material risks arising in the pension fund. These are primarily mitigated by the fund's investment in a liability driven investments portfolio that sought to hedge approximately 60% of these risks during the year.

All liabilities are matched with assets in the same currency, so mitigating currency risk.

Both BG and EIO continues to monitor factors affecting investment markets on an ongoing basis as a key part of the overall risk management process.

C.2.4 Market risk sensitivity

Various stresses and scenarios are considered. These are detailed in Section C.7.

C.3 Credit risk

C.3.1 Credit risk exposure

The most material credit risk that the EIO and therefore BG is exposed to is reinsurer default risk arising from default of one or more reinsurance counterparties. This risk is modelled stochastically with assumed default risk parameters based on exposure to individual reinsurers, credit ratings of those reinsurers, and assumed default rates and subsequent recoveries calibrated using historic data.

There is some exposure to premium debtor default risk and cash at bank default risk, and although these risks are not considered material they are also quantified within the capital model.

BG also has counterparty exposure through a loan agreement with Lloyd & Whyte (a subsidiary of BBAHL), an insurance broking company in which BG has a material strategic equity investment. The amount of this loan exposure at end of 2024 and is now £133.3m.

C.3.2 Credit risk concentration

EIO has risk appetite limits in place which are within the parameters of those risk appetite limits agreed by BG which limit exposure to any single reinsurer group. The largest individual reinsurance balance owed at 31 December 2024 was approximately £6.9m. This is monitored on a regular basis. The loan agreement noted above also represents a material risk concentration.

C.3.3 Credit risk mitigation

EIO has a wide, well-diversified panel of reinsurers, thereby diversifying the risk exposure. EIO only uses reinsurers with strong credit ratings and all those participating are approved and monitored regularly by the Reinsurance Security Committee. There are risk appetite limits in place for reinsurer groups based on credit ratings which are within the parameters of risk appetites set by BG.

The divisional entities of BG have strong credit control processes in place to manage broker and policyholder exposures including due diligence assessments for brokers that have credit facilities, with ongoing monitoring of the credit status and experience of making timely payments.

C.3.4 Credit risk sensitivity

Various stresses and scenarios are considered. These are detailed in Section C.7.

C.4 Liquidity risk

C.4.1 Liquidity risk exposure

Liquidity risk is the risk that EIO and therefore BG, although solvent, either does not have sufficient financial resources available to enable it to meet its obligations as they fall due, or can secure them only at excessive cost.

Assessment of this risk is primarily carried out by scenario analysis considering cash flows that would emerge in stressed circumstances. The scenario that is most likely to cause such issues would be a need to make substantial claims payments after an extreme catastrophe event, though this is mitigated by agreements for reinsurers to pay their recoveries prior to the Group paying claimants. The risk is further mitigated by holding most assets in highly liquid investments. Further detail is provided below.

There have been no significant changes to liquidity risk exposure over the reporting period.

C.4.2 Liquidity risk concentration

EIO holds a wide range of liquid investments, the largest counterparty being the UK Government. The overall assessment is that no liquidity risk concentrations are considered to be material.

C.4.3 Liquidity risk mitigation

Regular forecasts of future expected cash flow requirements are carried out and cash balances that are sufficient to cover these for several months in normal conditions in local currencies for all territories in which it has material business operations are maintained. Around 70% of EIO's investments are held in highly liquid assets so should be readily accessible in stressed circumstances.

In the event of a natural catastrophe resulting in a large number of claims, which is the most likely situation causing higher than normal liquidity needs, EIOs arrangements with reinsurers are made such that reinsurers will make payment of their proportion of the claim in advance of or simultaneously with payment to policyholders.

The Group also maintains a well-diversified panel of strongly rated reinsurers to minimise the potential for over-reliance on any one reinsurer, as discussed in Section C.3.

BG regularly monitors liquidity risk and manages the risk on an ongoing basis with oversight provided by the Group Chief Financial Officer. Examples of processes for managing liquidity risk are monitoring of risk limits and tolerances, monitoring of the investment strategy, and structuring of reinsurance contracts.

C.4.4 Liquidity risk sensitivity

The nature of the Group's liquidity risk means that it will not be a concern in any other than the most severe circumstances. Scenario analysis is undertaken examining resilience against extreme catastrophe losses combined with recoveries from the Group's largest reinsurer being disputed. The outcome is that, despite damage to profitability and solvency coverage, all expected payments could be made from cash and short-term bonds.

The scenario analysis confirms that there is sufficient liquidity EIO's portfolio of assets to have confidence that all payments would continue to be met even in the most extreme outcomes. However, liquidity remains a key consideration when setting investment policy.

C.5 Operational risk

C.5.1 Operational risk exposure

Operational risk is defined as 'the risk of loss arising from inadequate or failed internal processes, people and systems, or from external events'. The definition includes conduct of business, other aspects of compliance and legal risk but excludes strategic and reputational risks which are considered separately in section C.6.

Given the nature of BG's business model and through its divisional entities it is exposed to a number of different types of operational risks which at a high level can be categorised as:

- people risk;
- systems risk;
- process risk;
- regulatory risk;
- legal risk; and
- external environmental factors.

People, systems and process risks impact BG through the risk exposures within its divisional entities.

Legal and regulatory risk impacts BG both directly and through the risk exposures within its divisional entities. BG defines Legal and Regulatory Risk as the risk that operating across several different regulatory territories and legal landscapes is not managed effectively, leading to inefficiencies, errors, non-compliance with regulation or applicable laws, or acts giving rise to legal liability.

Broadly, these risks have not changed significantly during the year.

The Group's current approach to the quantification of operational risk involves the analysis of a range of scenarios through workshops held with subject matter experts and senior management, as detailed below.

C.5.2 Operational risk concentration

With respect to operational risk concentration, there are a number of key systems that support business operations within BGs divisional entities, specifically within EIO including underwriting and claims management. This naturally creates an operational risk concentration. Given the efficiencies to be gained from shared systems, this concentration will remain over the medium-term. Whilst this risk has been accepted it continues to be regularly monitored.

C.5.3 Operational risk mitigation

BG and its divisional entities accepts operational risk as a natural consequence of doing business. Mitigation techniques with respect to operational risk focus on the use of key controls including those that are directive, preventative, detective and corrective. Directive and Preventative controls are sought to either avoid a particular risk materialising or to lessen its impact if it does. Detective controls also provide value in helping to flag that a risk exposure is changing or is impacting business activities in a particular way. This allows corrective actions to be taken or planned to ensure that the risk exposure will not threaten the achievement of the wider strategic objectives.

Within EIO a long-term transformation programme is underway to ensure ongoing adequacy and effectiveness of material systems infrastructure which will include the implementation of a new core operating system. This will help to improve processes for front-line employees, provide a platform for business growth, and better serve customers and partners.

Information security and specifically cyber risk is critical due to the ever changing threats and increased volumes of malicious attacks seen across all types of businesses. This risk is managed by a wide-ranging set of preventative and detective controls which are under constant review and the Group has a dedicated Group Cyber Security and Business Continuity team. There continues to be an ongoing focus in ongoing development and testing of key controls in order to strengthen future resilience and protect its data.

In respect of regulatory and legal risk, it is managed by maintaining a strong ethical culture, an effective governance infrastructure, a proactive compliance function and by embedding understanding of legal and compliance requirements. The markets within which BG and its divisional entities operate in remains unchanged. There does however, continue to be a significant volume of regulatory change which continues to be monitored.

Conduct risk has long been considered an important risk, and part of the wider regulatory and legal risk universe within all divisional entities within BG. A robust proposition review process is in place which ensures that the customer is at the heart of all activities and that products and services are developed, distributed and maintained ethically, transparently and offering value for money.

C.5.4 Operational risk sensitivity

Stress and scenario analysis is used to identify the qualitative and quantitative impact of various operational risks crystallising that could have an adverse impact on the achievement of divisional or corporate objectives.

Each scenario is designed to be as realistic as possible and may examine individual or multiple stresses occurring simultaneously. Each scenario examined is extreme but also plausible in the context of the current business model and forward planning period, within the 1 in 200-year range of probability. Examples include an information security breach and systems unavailability.

These scenarios have a modest impact on EIO and therefore BG's short to medium-term solvency. The conclusion is that the BG's solvency coverage is resilient to quite extreme adverse operational risk scenarios.

C.6 Other material risks

Climate change risk relates to the financial risks arising through climate change. The key impacts for the BG and its divisional entities are physical risks (event driven or longer term shifts), the transition risks of moving towards a lower carbon economy, and liability risks associated with the potential for litigation arising from an inadequate response. Flood risk and other weather-related risk factors in insurance risk selection and catastrophe risk is managed through reinsurance models. The is also an ESG overlay operated on the investment strategy.

BG's other material risks are strategic, group and reputational risk.

Strategic risk relates to risks associated with the effective development and ongoing implementation of the BG's strategy. It also covers wider risks relating to the competitive and macro environment. These risks are not explicitly covered in the capital requirements which are all based on more extreme, lower likelihood, higher impact events. BG is naturally exposed to the risk of failing to develop or implement an appropriate strategy for the business. This could arise from a failure to adequately identify or assess the threat presented by competitors, failure to fully understand markets or setting a strategy without due regard to the capability within BG.

Group risk relates to exposures resulting from the operating model that is in place. There is a risk that divisions do not manage themselves in line with the overall BG strategy or vision, or that issues within a division spread to other business units due to the interconnected nature of the Group structure.

Reputational risk relates to exposures that would result in negative reputational impacts upon BG and its divisional entities were they to occur. Reputational risks are often associated with other risk types. For example, a regulatory breach (operational risk) will have reputational risks associated with it.

Maintaining a positive reputation is critical to BG's vision of being the most trusted and ethical specialist financial services group. Risks to BG's brand and reputation are inherently high in an increasingly interconnected environment, with the risks of external threats such as cyber security attacks, and viral campaigns through social media always present. Strong and proactive controls are operated in order to monitor media activity generally, with additional activity overseen latent claims.

All of these risks have been considered when developing the business plans and actions have been derived to address the risks identified. All key risks are also explored within the stress testing and scenario analysis framework in order to ensure that the business has a good understanding of their potential impacts.

BG's system of governance covered in section B helps to mitigate these risks.

There are no material risk concentrations from these risks.

C.7 Any other information

C.7.1 Stress and scenario testing

The business plan is subject to a wide range of single and combination scenarios that explore the impact that risk events can have on the business. Each scenario represents an extreme yet plausible event that could impact the business plan, operations and financial health of the Group. Whilst extreme, each event is also reasonably foreseeable as part of future developments, for example within a 1 in 200 year range of probability.

The approach involves identification of events and independent derivation of losses and return periods associated with these events. These are compared against a distribution of model outputs using pre-defined pass/fail criteria in order to draw conclusions on model accuracy and risk coverage.

Some examples of the scenarios considered are:

- higher than planned attritional claims;
- deterioration in PSA reserves;
- reduction in GWP year on year;
- windstorm catastrophe event combined with reinsurer default;
- increase in operating expenses and broker commissions;
- market fall combined with a windstorm catastrophe event and a reinsurer default; and
- geopolitical shock combined with high inflation.

The impacts of each of the scenarios considered are in line with expectations. The capital position is strong and remains resilient in highly stressed circumstances. Combining the more extreme market stresses with the most extreme underwriting scenario puts the greatest strain on the business.

The outcome of testing was discussed by the Board during the year and consideration given to the current environment and the impact of high inflation on the Group's viability. Among the considerations and scenarios were further investment market volatility, claims experience and business deterioration. Analysis confirms that BG has sufficient capital resources to cover its capital requirements and is operationally resilient.

Reverse stress testing (RST)

Reverse stress testing is an important risk management tool and provides the Board with further insight into the ability of BG to withstand extremely severe adverse scenarios. It is also a key validation component for the internal model. Various RSTs are performed by starting from the point of business model failure and working backwards to identify plausible root causes which would result in the business model becoming unviable.

Consideration is given to both single risk event scenarios, such as individual large catastrophe events, extreme economic shocks and reinsurer defaults, as well as combination risk event scenarios, such as an economic shock combined with a material insurance risk event. The exercise shows key risks and scenarios that may materially impact BG and confirms the business model is sufficiently resilient.

D. Valuation for solvency purposes

All material asset and liability classes have been valued in accordance with the PRA Rulebook.

Material assets and liabilities are defined as assets and liabilities that are valued in excess of £6.9m (Equivalent to 1% of IFRS net assets).

As permitted by the PRA Rulebook, the valuation of assets and liabilities are based, where appropriate, on the valuation method used in the preparation of the annual report and accounts. The financial statements have been prepared in accordance with UK adopted International Accounting Standards (IFRS) and audited by external auditors.

IFRS 9, Financial Instruments, requires the classification of certain financial assets and liabilities into separate categories for which the accounting requirement is different. This replaced International Accounting Standard (IAS) 39, Financial Instruments: Measurement and Recognition when adopted on 1st January 2023.

The classification depends on the nature and purpose of the financial assets and liabilities, and is determined at the time of initial recognition. Financial instruments are initially measured at fair value. Their subsequent measurement depends on their classification.

Financial instruments designated as at fair value through profit or loss and hedge accounted derivatives under International Financial Reporting Interpretations Committee (IFRIC) 16 are subsequently carried at fair value.

All other financial assets and liabilities are held at amortised cost using the effective interest method, except for short-term receivables and payables where the recognition of interest would be immaterial.

The Directors consider that the carrying value of those financial assets and liabilities not carried at fair value approximates to their fair value.

On adoption of IFRS 16 Leases, the Group recognised right-of-use assets and associated lease liabilities in relation to leases which had previously been classified as 'operating leases' under the principles of IAS 17, Leases.

Right-of-use assets are measured at an amount equal to the lease liability adjusted by the amount of any prepaid or accrued lease payments relating to that lease recognised in the balance sheet at initial recognition. Lease liabilities have been measured at the present value of the remaining lease payments, discounted using the lessee's incremental borrowing rate.

Subordinated liabilities are recognised initially at fair value, being the issue proceeds net of premiums, discounts and transaction costs incurred. All borrowings are subsequently measured at amortised cost using the effective interest rate method. The amortisation is recognised as an interest expense using the effective interest rate method.

The product launched by ELL in 2021 has no significant insurance risk and is therefore classified as a financial instrument in the preparation of the annual financial statements. The Group recognises a liability measured at fair value. The fair value of these liabilities is estimated based on an arms-length transaction between willing market participants with consideration given to the cost of the guarantee to the policyholders. The cost of the guarantee to policyholders is determined using risk free rates of return, with the associated volatility assumption and allowing for the costs of administration associated with this low-risk investment strategy.

D.1 Assets

D.1.1 Solvency II valuation of assets

A copy of the quantitative reporting template (QRT) 'S.02.01.02 – Balance sheet' is included in Appendix 1 and shows a list of assets by class as reported in the annual QRT of the Group.

The table below summarises the SII Valuation and the differences that arise in comparison with the financial statements' net asset value prepared in accordance with IFRS, together with an analysis of assets:

Solvency II valuation	2024 As Reported IFRS Basis	Remove non-insurance	Reclassify to aid comparison	2024 Reclassified IFRS valuation	Net valuation difference	2024 Solvency II Valuation
	£'000	£'000	£'000	£'000	£'000	£'000
Total Assets	2,253,664	(504,446)	(1,798)	1,747,420	(127,918)	**1,619,502**
Total liabilities	1,568,039	(504,446)	(1,798)	1,061,795	(45,004)	**1,016,791**
Net assets	685,625	-	-	685,625	(82,914)	**602,711**
Breakdown of asset valuation						
Goodwill	99,048	(82,756)	-	16,292	(16,292)	**-**
Intangible assets	71,348	(5,982)	-	65,366	(65,366)	**-**
Deferred tax assets	8,707	(1,342)	-	7,365	(6,586)	**779**
Pension benefit surplus	17,552	-	-	17,552	-	**17,552**
Property, plant & equipment held for own use	45,496	(11,212)	-	34,284	-	**34,284**
Investments - Participations	209	26,471	56,464	83,144	(33,595)	**49,549**
Investments - Other	1,573,086	(443,936)	6,014	1,135,164	(3,831)	**1,131,333**
Loans & mortgages	14	90,096	(56,041)	34,069	(4,026)	**30,043**
Reinsurance recoverables - Non-Life	239,453	-	(1,798)	237,655	(67,739)	**169,916**
Insurance & intermediaries receivables	-	-	-	-	55,887	**55,887**
Reinsurance receivables	-	-	-	-	7,712	**7,712**
Receivables (trade, not insurance)	57,759	(35,069)	(3,173)	19,517	(10,030)	**9,487**
Cash and cash equivalents	136,724	(28,994)	(2,841)	104,889	-	**104,889**
Any other assets, not elsewhere shown	4,268	(11,722)	(423)	(7,877)	15,948	**8,071**
Total assets	2,253,664	(504,446)	(1,798)	1,747,420	(127,918)	**1,619,502**

The table includes reclassification of certain IFRS assets and liabilities to aid comparability. This has been done as items such as debtors arising from insurance contracts, which are included within insurance liabilities in the financial statements, are included within the valuation of insurance and intermediaries receivable for SII provided they are not past their due date. Moving this balance from liabilities to assets removes the need to disclose the same difference in both assets and liabilities.

Goodwill

Goodwill in the financial statements represents the excess of the cost of an acquisition over the fair value of the Group's share of the identifiable assets and liabilities acquired at the date of acquisition. SII requires goodwill to be valued at nil.

Intangible assets

Intangible fixed assets are valued at amortised cost in the financial statements.

For SII these assets have been valued at nil as amortised cost is not a permitted method of valuation and it is not practicable to obtain an independent valuation of these assets.

Deferred tax assets

The calculation of deferred tax is based on temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for tax purposes. Deferred tax is measured using tax rates expected to apply when the related deferred tax asset is realised or the deferred tax liability is settled based on tax rates and laws which have been enacted or substantively enacted at the year-end date.

For SII, deferred tax has been recalculated to take into account the valuation differences between the financial statements and the SII valuation of assets and liabilities. The tax rate used is 25%, being the future rate used in the annual report and accounts for balances reversing after April 2024.

Pension benefit surplus

The Group operates a number of defined benefit and defined contribution plans, the assets of which are held in separate trustee-administered funds.

In accordance with IAS 19, Employee Benefits, for defined benefit plans, the pension costs are assessed using the projected unit credit method. Under this method, the cost of providing pensions is charged to profit or loss so as to spread the regular cost over the service lives of employees, in accordance with the advice of qualified actuaries.

The pension obligation is measured as the present value of the estimated future cash outflows using a discount rate based on market yields for high-quality corporate bonds. The resulting pension plan surplus appears as an asset or obligation in the statement of financial position. Any asset resulting from this calculation is limited to the present value of economic benefits available in the form of refunds from the plan or reductions in future employer contributions to the plan.

Below is an analysis of the assets of the EIO Staff Retirement Benefit Fund:

Plan Assets	2024	2023
	£'000	£'000
Government bonds	16,551	13,782
Corporate Bonds	94,415	85,693
Listed Equity	48,808	85,576
Unlisted Equity	400	48
Investment funds	94,829	71,339
Collateralised securities	336	368
Cash and cash equivalents	3,689	10,332
Investment Property	37,897	37,932
Derivatives	(592)	(144)
Other	-	719
	296,333	**305,645**

Property, plant and equipment held for own use

This category can be further analysed into the following classifications:

Analysis of property, plant & equipment held for own use	2024	2023
	£'000	£'000
Property improvements, fixtures, fittings & computer equipment	10,283	9,910
Owner occupied property	600	2,553
Right of use assets - property	22,828	20,672
Right of use assets - motor vehicles	573	1,048
	34,284	**34,183**

Property improvements, fixtures and fittings, and computer equipment are valued in the financial statements on an amortised cost basis. As these assets pass impairment reviews and continue to deliver an economic benefit to the Group, which is reflected in their IFRS carrying value, this is assumed to be an acceptable approximation of fair value. A proportional approach has been taken as any discrepancy between their SII economic value and their IFRS value would not be material.

A valuation of owner-occupied property is undertaken by an external valuer every three years for the financial statements. As any change in value arising from a more frequent annual valuation would not be material, no adjustment to this value is made for the SII valuation.

Right-of-use assets have been valued at the present value of the remaining lease payments, discounted using the lessee's incremental borrowing rate. This is assumed to be an acceptable approximation of fair value. A proportional approach has been taken as any discrepancy between their SII economic value and their IFRS value would not be material.

Motor vehicles are valued on an amortised cost basis in the financial statements. Their IFRS carrying value is assumed to be an acceptable approximation of fair value. A proportional approach has been taken as any discrepancy between their SII economic value and their IFRS value would not be material.

Investments – participations (subsidiary undertakings)

The Group's financial statements fully consolidate all of the group's subsidiaries. Under SII, only insurance companies, insurance holding companies and ancillary service companies of the Group are fully consolidated. The tables above and in section D.3 therefore include a column where the assets and liabilities of other subsidiaries are removed from the IFRS consolidation and included in 'participations' as a single value.

The value of the Group's asset managment firms, EdenTree Investment Management Limited and EdenTree Asset Management Limited have been valued under sectoral rules for SII (unaudited), as required by the PRA Rulebook.

As all the remaining participations that are not fully consolidated are unlisted companies, the preferred SII valuation method of using quoted market prices as required by the PRA Rulebook is not possible. The alternative method has therefore been adopted whereby each participation's assets and liabilities are valued on a SII basis and the resulting value recognised using the adjusted equity method in accordance with the PRA Rulebook.

Key drivers for the difference in valuation of participations (£34.5m) between SII and IFRS are the removal of goodwill, intangible assets and prepayments.

Investments – other

Other investments comprises property, equities, corporate and government bonds, investment funds, derivatives and deposits.

The fair value measurement basis used to value investments held at fair value is categorised into a fair value hierarchy as follows:

Level 1: fair values measured using quoted bid prices in active markets for identical assets. This category includes listed equities in active markets, listed debt securities in active markets and exchange-traded derivatives.

Level 2: fair values measured using inputs other than quoted prices included within level 1 that are observable for the asset, either directly (i.e. as prices) or indirectly (i.e. derived from prices). This category includes listed debt or equity securities in a market that is not active and derivatives that are not exchange-traded.

These financial assets are valued using third-party pricing information that is regularly reviewed and internally calibrated based on management's knowledge of the markets. Where material, these valuations are reviewed by the GAC.

Level 3: fair values measured using inputs for the asset that are not based on observable market data (unobservable inputs). This category includes unlisted debt and equities, including investments in venture capital, and suspended securities. Where a look-through valuation approach is applied, underlying net asset values are sourced from the investee, translated into the Group's functional currency and adjusted to reflect illiquidity where appropriate, with the fair values disclosed being directly sensitive to this input.

Accrued interest of £3.2m included within 'receivables (trade, not insurance)' in the financial statements have been moved to investments as bond valuations are inclusive of accrued interest for SII. This is a presentational difference only with no change in value.

Investments – property

Investment property comprises land and buildings which are held for long-term rental yields and is carried at fair value. Investment property is valued annually by external qualified surveyors at open market value.

Investments – derivatives

All derivatives are initially recognised at their fair value, which usually represents their cost, including any premium paid. They are subsequently re-measured at their fair value, with the method for recognising changes in the fair value depending on whether they are designated as hedges of net investments in foreign operations. All derivatives are carried as assets when the fair values are positive and as liabilities when the fair values are negative.

The Group's derivative contracts are not traded in active markets. Foreign currency forward contracts are valued using observable forward exchange rates corresponding to the maturity of the contract and the contract forward rate. Over-the-counter equity or index options and futures are valued by reference to observable index prices.

Investments – deposits other than cash equivalents

This comprises highly liquid investments with original maturities of more than three months. These balances are typically deposit balances with banks. As cash balances are not subject to a significant risk of change in value, they are considered to be held at fair value.

Loans and mortgages

Loans are carried at amortised cost using the effective interest method, which is assumed to approximate to fair value. Loans are recognised when cash is advanced to borrowers. To the extent that a loan or receivable is uncollectable, it is written off as impaired.

For SII these balances are valued at the present value of their expected future cash flows. The key assumptions used in the valuation are loan duration, interest rate and discount rate. The interest rate is as defined in the loan agreement and is typically either fixed or based on a fixed margin above the Bank of England Base Rate. The discount rate used is taken from the risk-free curves published by the PRA.

Reinsurance recoverables

The valuation of reinsurers' share of TPs and the differences in valuation methodology compared with the IFRS financial statements is covered in section D.2.

Insurance & intermediaries receivables and reinsurance receivables

Due to the short-term nature of the outstanding balances, their amortised cost is assumed to approximate to their fair value. Under SII only amounts past their due date are included in insurance and intermediaries' receivables and reinsurance receivables. Amounts not past their due date form part of TPs (See section D.2).

Receivables (trade, not insurance)

This comprises trade debtor balances. Due to the short-term nature of the outstanding balances, their amortised cost is assumed to approximate to their fair value. The valuation of non-insurance receivables for SII is the same as in the financial statements except for £12.8m of prepayments which have no economic value.

Cash and cash equivalents

Cash and cash equivalents include cash in hand, deposits held at call with banks, other short-term highly liquid investments with original maturities of three months or less, and bank overdrafts. As cash balances are not subject to a significant risk of change in value, they are considered to be held at fair value.

Any other assets

Intercompany debtor balances within the wider Group are shown as any other assets. The balances are repayable on demand, and the amortised cost is assumed to approximate to fair value.

D.1.2 Differences between group and subsidiary-level valuation basis

There are no material differences in the bases, methods and main assumptions used at Group level for the valuation for SII purposes of the Group's assets compared with those used by the Group's subsidiaries for their own solvency purposes.

D.2 Technical provisions

D.2.1 Solvency II valuation of technical provisions and assumptions used

Non-life technical provisions

Under Solvency II the TPs are made up of:

- Discounted best estimate claims provisions;
- Discounted best estimate premium provisions; and
- Risk margins (unaudited).

The non-life TPs are calculated as a sum of best estimate and risk margin using a three-stage process of grouping data for homogeneous risks, selecting methodologies, and setting assumptions which take into account the economic, underwriting and reserving cycles.

The reserving process captures material factors via engagement and interaction across relevant business areas, particularly the claims and underwriting functions. These factors may not be inherent in the historical data. For example, a change introduced to the claims management philosophy may impact the incurred development pattern going forward.

The reserving framework is structured such that sufficient oversight exists within the reserve setting process through reviews by key stakeholders within management, by the Actuarial Function Director, and ultimately by the Board via the GAC. This ensures there is an independent challenge to the process and results, and that future developments within the business are incorporated into the projections where appropriate.

Modelling methodologies and assumptions

The nature of input assumptions for the reserving models used in projecting ultimate claims costs varies based on the class of business modelled, the levels of historical data available and the nature and complexity of the underlying risk. The final choice of model and assumptions involves professional actuarial judgement and a technical review within the reserving Governance Framework.

The following methods are used accordingly:

- Incurred Development Factor Method (DFM) used either in isolation for 'Fire and other property damage' classes or in combination with other methods for liability and latent classes;
- Bornhuetter-Ferguson Method (BF) used primarily for more recent development years for the liability classes;
- Frequency-Severity Approach, either deterministic for liability classes or stochastic for latent claims;
- scenarios framework for Events Not In Data (ENID), which generally would not have been foreseen at the time of writing the policies;
- exposure based methods are used to assess Covid-19 loss of profits reserves, based on policy terms and limits and propensity to claim assumptions.
- Simplified methods including scaling based on exposure measures for smaller territories; and

- discontinued and inwards reinsurance businesses are either a fixed percentage of case outstanding or a fixed amount.

The premium provision uses realistic business planning assumptions relating to the future accident year period, adjusted if necessary to ensure no credit is taken for material planned future actions.

Once the best estimates are calculated all future years' cash flows are discounted to present value using the prescribed risk-free discount curve for the relevant currency interest rate-term structure.

The reinsurer's share of incurred but not reported (IBNR) calculations are varied depending on the type of treaty. Proportional arrangements use assumptions on net to gross ratios and excess of loss arrangements incorporate stochastic modelling of net average costs where applicable.

Expected defaults are calculated by reference to reinsurer credit ratings and the expected term of the recoverable.

Valuation

Claims provisions, premium provisions and risk margin by class are reported on 'QRT IR.17.01.02 – Non-life technical provisions'.

The two major contributors to the TPs are the 'general liability' and 'fire and other property damage' classes of business.

The distribution of reserves by line of business reflects differences in risk and claim behavioural experiences. Comments on material lines are given individually below.

Fire & other property damage

The TPs for this class are weighted between both premium and claims provisions due to the short-tail nature of these risks and potential for unusually large or catastrophe event claims to occur during the future exposure period.

General liability

The TPs for this class are heavily weighted towards the claim provision due to the longer-tail nature of these risks, which may be complex and take many years to settle, and with potential for late reported or latent claims to emerge.

Latent classes are particularly sensitive to changes in the discount rate.

Motor vehicle classes

The majority of motor business has been in run-off since 2013. The motor TPs are calculated at an aggregated level for 'motor third party liability' and 'other motor', with substantially all of the remaining reserve relating to liability claims.

TPs for this line of business are expected to continue to reduce over time but remain subject to risk of late developments on open cases.

Non-proportional reinsurances

These classes relate to casualty and property reinsurance arrangements entered into with external companies and businesses in run-off, and run-off London Market business.

Risk margin (unaudited)

The SII risk margin is the present value cost of capital for a reference undertaking subject to a SCR over the period of fulfilling the obligated business cash flows. The SCR for each year of run off reflects a 1 year view of risk for the relevant Insurance, Counterparty, Operational and Unavoidable Market risks in that period. The risk margin has adopted the internal model calculation, at individual model class level, using the modelled SCR for each class and the diversification available between these classes. The internal model class diversified risk margin outputs are then aggregated to the SII reporting classes.

The level of risk margin held is driven by the primary risks for the non-life insurance business, being General Liability reserve risk and catastrophe risk for Fire and Other Property Damage, and the term over which these risks run off. Under SII principles this margin is not allocated as gross and ceded, but is a single value based on the risk net of reinsurance.

Life technical provisions

The Group’s most material line of life business is now the new product launched in August 2021, as volumes continued to rise, the legacy whole-of-life policies backing funeral plans continues to run off as expected.

TPs are valued by projecting probability-weighted future cash-flows using best-estimate assumptions and discounting these to the reporting date using a risk-free curve specified by the PRA.

The main assumptions made for this are:

- mortality – 96% of population mortality tables, ELT16M (males) and ELT16F (females) in 2024 with improvement of 1% per annum in future years;
- benefit escalation (Retail Prices Index (RPI)) for legacy business – derived from market inflation swap rates at the reporting date (31 December 2024); and
- future renewal expenses – Legacy whole-of-life: £17.76 per policy per annum, inflating at RPI (as above) plus 0.75% per annum. New whole-of-life: 0.3% p.a. of AUM and £6.94 per policy per annum, inflating at RPI plus 0.75% per annum.

D.2.2 Level of uncertainty

Non-life technical provisions

The estimation of the ultimate liability arising from claims made under non-life insurance contracts is subject to uncertainty as to the total number of claims made on each class of business, the amounts that such claims will be settled for and the timings of any payments. Examples of uncertainty include:

- whether a claims event has occurred or not and how much it will ultimately settle for;
- variability in the speed with which claims are notified and in the time taken to settle them, especially complex cases resolved through the courts;
- changes in the business portfolio affecting factors such as the number of claims and their typical settlement costs, which may differ significantly from past patterns;
- new types of claim, including latent claims, which arise from time to time;
- changes in legislation and court attitudes to compensation, which may apply retrospectively;
- the potential for periodic payment awards, and uncertainty over the discount rate to be applied when assessing lump sum awards;
- the way in which certain reinsurance contracts, principally liability, will be interpreted in relation to unusual or latent claims where aggregation of claimants and exposure over time are issues; and
- whether all such reinsurances will remain in force over the long term.

While the best estimate TPs calculation targets reserving for the average or expected future cost within a range of possible outcomes, due to the uncertainties, it is likely that the actual costs will differ from the reserved amount.

In order to better understand the underlying uncertainty a range of possible outcomes are tested and analysed by running a series of sensitivities.

Sensitivity analysis is a technique used to understand the variability of possible outcomes. This is done by analysing the change in TPs as a result of adjusting a single input parameter.

The sensitivity analysis of TPs is a useful risk management tool that helps the business identify which internal factors are key drivers of the total provision. The ability to identify the key risk drivers of the TPs allows management to identify lead indicators to monitor these drivers, so as to better predict their effect and manage the risks associated with uncertainty.

Life technical provisions

Judgement is made to derive all of the assumptions used in the calculation of TPs. For each of these the actual future outcomes may differ from the values assumed, giving uncertainty in the value of TPs.

The assumed level of future inflation will affect the value of assumed future legacy business benefit payments and so the value of TPs. The assumptions are derived from market swap rates at the reporting date and are consistent with the methodology used to set the risk-free yields.

The assumption of future levels of mortality will have a relatively minor impact on the value of TPs. Experience of this portfolio of business has been sufficiently credible to give comfort that the long-term level of mortality in 2024 will not deviate materially from the base level assumption, though the impact of the Covid-19 pandemic introduces additional uncertainty to this assumption.

For the future improvements in mortality, the uncertainty that would lead to an increase in value of liabilities is related to greater annual rates of improvement than assumed.

The expenses incurred in running off the in-force business could differ from assumed levels.

D.2.3 Comparison of Solvency II technical provisions with valuation in annual financial statements

Non-life technical provisions

The building blocks making up the TPs can be split between those for which the valuation methodology is compatible between SII and IFRS, and those which by requirements of the SII technical specifications will necessarily be different.

The claims provision calculation (liability on earned business) may follow similar bases, methods and assumptions as IFRS, with the exception that the SII discount rate is prescribed by the PRA. In contrast, the discount rate used in the IFRS accounts is tailored to reflect the characteristics of the liabilities.

Non life net technical provisions	2024	2023
	£'000	£'000
IFRS Technical Provisions net of deferred acquisition costs, debtors and creditors	731,146	669,868
Unearned profit	(36,267)	(23,830)
Claims reserve and risk	(9,143)	(7,726)
Other adjustments	(5,127)	34,160
SII Net technical provisions	680,609	672,472

A key difference between the valuation of liabilities for solvency purposes and those used in the financial statements is that the latter includes an explicit risk adjustment for non-financial risks margin whereas the former incorporates an explicit risk margin calculated on a different basis. The underlying best estimates are the same for both bases with the exception of the expense assumptions and discount rates used.

Other adjustments relate to the consideration of future premium cash inflows in the premium provision for SII.

The main difference for the Group continues to be the conceptual difference for timing of recognising profit on unearned business. SII provisions are lower due to recognition of expected future profits on inception, driving £36.3m reduction (2023: £23.8m reduction). Discounting differences between bases also drives a valuation difference across both claims provision and risk margin, SII TPs being lower by £9.1m (2023: £7.7m lower). Other differences are not significant.

Life technical provisions

Life net technical provisions	2024	2023
	£'000	£'000
IFRS reserves (Legacy business)	49,078	55,630
Deduct IFRS Risk Adjustment	(372)	(230)
Deduct Contractual Service Margin	(6,439)	(6,801)
Expenses assumed	(92)	(309)
Real interest rate	1,284	1,161
Investment expenses	287	384
Explicit Risk Margin	87	110
SII Net technical provisions	43,833	49,945
IFRS Life business liabilities (ELLIS product)	133,706	95,886
Impact of investment assumptions	(5,722)	(3,605)
Explicit Risk Margin	328	195
SII Net technical provisions	128,312	92,476
Total SII Net technical provisions	**172,145**	**142,421**

Legacy life insurance business

A key difference between the valuation of liabilities for solvency purposes and those used in the financial statements is that the latter includes an explicit risk adjustment for non-financial risks margin whereas the former incorporates an explicit risk margin calculated on a different basis. The underlying best estimates are the same for both bases with the exception of the expense assumptions and discount rates used.

The SII valuation discounts cash-flows using a risk-free curve derived from swap rates with the addition of a volatility adjustment (24 basis points at 31 December 2024), whilst the valuation for the financial statements uses a discount rate curve based on the government bond yields plus an illiquidity risk premium.

ELLIS product

The ELLIS product is classified as an investment contract. Life business liabilities are valued in the IFRS annual report and accounts at fair value. The fair value of these liabilities is estimated based on an arms-length transaction between willing market participants with consideration given to the cost of the guarantee to the policyholders. For SII life business liabilities are transferred to TPs. Valuation of TPs is covered above.

D.2.4 Differences between group and subsidiary-level valuation basis

There are no material differences in the bases, methods and main assumptions used at group level for the valuation for solvency purposes of the Group's life and non-life TPs compared with those used by the Group's subsidiaries for their own solvency purposes.

D.2.5 Use of the matching adjustment

The matching adjustment has not been applied.

D.2.6 Use of the volatility adjustment

The volatility adjustment has not been applied to the non-life insurance TPs. For life insurance the volatility adjustment is used to calculate the value of TPs for the legacy single premium funeral plan business only. The unadjusted risk free curve is used for the rest of the Group's life business.

If the volatility adjustment was changed to zero, the impact would be an increase in TPs of £767k, an increase in the Group SCR of £50k, and a decrease of £767k in both basic own funds and amount of own funds eligible to cover the Group SCR and the minimum consolidated Group SCR.

D.2.7 Use of the transitional risk-free interest rate-term structure and the Article 308[d] transitional deduction

The transitional risk-free interest rate term structure and transitional deduction are not applied in calculating the technical provisions.

D.2.8 Recoverables from reinsurance contracts and special purpose vehicles

Non-life technical provisions

The recoverables are calculated separately by territory and by class of business taking into account the arrangements that are in place for each year of loss. Various arrangements apply to the Fire and Other Property Damage classes. These include surplus proportional reinsurance treaties and facultative arrangements for risks larger than those covered by the treaties. Quota share arrangements are also in use. Excess of loss cover applies for single events or aggregation of losses, and to the General Liability and Motor classes. Special purpose vehicles are not used.

The relative size of reinsurance recoverables included in the TPs from period to period is closely linked to the relative size of reserves by class, subject to occurrence or otherwise of unusually large losses for the excess of loss accounts.

For the premium provision, the amounts also reflect the nature of the reinsurance contracts due to the inclusion of future premiums payable in the reinsurance TP.

Where coverage is purchased on a risks-attaching basis, the premium is either pre-paid or effectively held as a short-term creditor on the balance sheet. Where coverage is purchased on a losses occurring basis, the TP includes any future cost not yet recorded elsewhere on the balance sheet in respect of obligated business.

Life technical provisions

There are no recoverables assumed from reinsurance contracts or special purpose vehicles. This is unchanged from the previous reporting period.

D.2.9 Material changes in the assumptions made in the calculation of technical provisions compared to the previous reporting period

Non-life technical provisions

There have been no significant changes to previously used assumptions for non-life TPs.

Life technical provisions

The most material changes in the relevant assumptions made in the calculation of TPs compared to the previous reporting period are those reflecting economic conditions and outlook at the reference dates of the respective calculations.

D.3 Other liabilities

D.3.1 Solvency II valuation of other liabilities

A copy of the QRT ‘S.02.01.02 – Balance sheet’ is included in Appendix 1 and shows a list of liabilities by class as reported in the annual QRT of the Group.

The table below summarises the SII Valuation and the differences that arise in comparison with the financial statements' net asset value prepared in accordance with IFRS, together with an analysis of liabilities:

Solvency II valuation	2024 As reported IFRS Basis	Remove Non-Insurance	Reclassify to aid comparison	2024 Reclassified IFRS valuation	Net valuation difference	2024 Solvency II Valuation
	£'000	£'000	£'000	£'000	£'000	£'000
Total Assets	2,253,664	(504,446)	(1,798)	1,747,420	(127,918)	**1,619,502**
Total liabilities	1,568,039	(504,446)	(1,798)	1,061,795	(45,004)	**1,016,791**
Net assets	685,625	-	-	685,625	(82,914)	**602,711**
Breakdown of liability valuation						
Technical provisions Non-life	730,597	(2,439)	(1,798)	726,360	(45,751)	**680,609**
Technical provisions life	-	49,671	133,706	183,377	(11,233)	**172,144**
Provisions other than technical provisions	9,707	(3,728)	-	5,979	-	**5,979**
Pension benefit obligations	7,906	(3,574)	-	4,332	-	**4,332**
Deferred tax liabilities	42,299	(8)	-	42,291	2,207	**44,498**
Derivatives	215	-	-	215	-	**215**
Debts owed to credit institutions	32,973	(8,400)	-	24,573	-	**24,573**
Subordinated liabilities in BOF	25,185	(74)	-	25,111	(4,756)	**20,355**
Payables (trade, not insurance)	714,814	(533,966)	(133,706)	47,142	16,944	**64,086**
Deferred income	4,343	(1,928)	-	2,415	(2,415)	**-**
Total liabilities	1,568,039	(504,446)	(1,798)	1,061,795	(45,004)	**1,016,791**

The table includes reclassification of certain IFRS assets and liabilities to aid comparability, as explained in section D.1. A description of how the liabilities have been valued, and any differences from the IFRS valuation, are explained below.

Technical provisions – life and non-life

The valuation of life and non-life TPs and the differences in valuation methodology compared with the IFRS financial statements are covered in section D.2.

Provisions other than technical provisions

Provisions are recognised when the Group has a present legal or constructive obligation, as a result of past events, and it is probable that an outflow of resources, embodying economic benefits will be required to settle the obligation, and a reliable estimate of the amount of the obligation can be made. Where the Group expects a provision to be reimbursed, the reimbursement is recognised as a separate asset, but only when it is virtually certain that the reimbursement will be received.

Pension benefit obligations

As noted in section D.1. the Group operates a number of defined benefit and defined contribution plans, the assets of which are held in separate trustee-administered funds. Any deficit arising is recognised here. The Group also provides post-employment medical benefits to some of their retirees. The expected costs of these benefits are accrued over the period of employment using an accounting methodology similar to that for defined benefit pension plans. Independent qualified actuaries value these obligations annually.

Deferred tax liabilities

The calculation of deferred tax in the financial statements is covered in deferred tax assets in section D.1. For SII, the deferred tax liability has been recalculated to take into account the valuation differences between the financial statements and the SII valuation of assets and liabilities. The liabilities are mainly in relation to unrealised gains on financial investments.

Debts owed to credit institutions

This comprises amounts due in respect of finance leases. Finance leases are leases where a significant portion of the risks and rewards of ownership is transferred to the Group. Assets obtained under finance lease contracts are capitalised as property, plant and equipment and are depreciated over the period of the lease. Obligations under such agreements are included within liabilities net of finance charges allocated to future periods.

Insurance & intermediaries payables and reinsurance payables

Due to the short-term nature of the outstanding balances, their amortised cost is assumed to approximate to their fair value. Under SII only amounts past their due date are included in insurance & intermediaries payables and reinsurance payables as amounts not past their due date form part of TPs (Section D.2).

Subordinated Liabilities

Subordinated liabilities consist of a privately placed issue of 20-year subordinated bonds, maturing in February 2041 and callable after February 2031. The Group's subordinated debt ranks below its senior debt and ahead of its preference shares and ordinary share capital.

Subordinated liabilities are recognised initially at fair value in the financial statements. All borrowings are subsequently measured at amortised cost using the effective interest rate method. For SII, the fair value is calculated as the present value of future cash flows, using a risk-free discount curve adjusted to take into account the credit standing of the issuing company at initial recognition of the liability.

Payables (trade, not insurance)

Except for life business liabilities, all balances recognised are short-term in nature and so their carrying value in the financial statements is deemed to be an appropriate approximation of fair value. Included within Payables (trade, not insurance) are unpresented cheques which are removed in the SII valuation as they have no economic value.

Life business liabilities are valued in the IFRS annual report and accounts at fair value. The fair value of these liabilities is estimated based on an arms length transaction between willing market participants with consideration given to the cost of the guarantee to the policyholders. For SII life business liabilities are transferred to TPs. As noted above, valuation TPs is covered in section D.2.

Deferred commission income

As with deferred acquisition costs, covered in section D.1, deferred commission income has not been recognised in the SII valuation as they have no future cash flow and therefore have no fair value.

D.3.2 Differences between group- and subsidiary- level valuation basis

There are no material differences in the bases, methods and main assumptions used at group level for the valuation for solvency purposes of the Group's liabilities compared to those used by the Group's subsidiaries for their own solvency purposes.

D.4 Alternative methods for valuation

No assets or liabilities have been valued using alternative valuation methods.

D.5 Any other information

There is no further material information regarding the valuation of assets and liabilities for solvency purposes.

E. Capital Management

Under SII, capital that the Group can use to meet its regulatory SCR is called own funds. Off-balance sheet items that can be called upon to absorb losses are called ancillary own funds. The Group does not hold any such items.

Own Funds	2024 £'000	2023 £'000
Solvency II valuation of assets	1,619,502	1,569,595
Solvency II valuation of liabilities	(1,016,791)	(980,623)
Excess of assets over liabilities	602,711	588,972
Qualifying subordinated liabilities	20,355	21,182
Foreseeable distributions	(4,391)	(12,391)
Non-available own funds at group level	-	-
Total eligible own funds	**618,675**	**597,763**

The excess of assets (section D.1) over liabilities (section D.3) plus qualifying subordinated debt less any foreseeable distributions and non-available own funds at group level, constitutes total eligible own funds that are available to meet the group SCR.

Foreseeable distributions are future material expense items at Group level such as dividends that have been approved for payment by the Board.

The PRA Rulebook requires regulated undertakings within the Group to retain sufficient eligible own funds to cover their own solvency requirement. This meant that an element of own funds of each undertaking may not be freely moved around the Group and therefore be unavailable to the Group to cover the Group SCR. This is referred to as 'non-available own funds at group level'.

E.1 Own funds

E.1.1 Own funds - objectives, policies and processes

The overall responsibility for reviewing and approving the Capital Management Policy lies with the Board. The responsibility for the policy implementation resides with all management and employees involved in managing capital and solvency across the Group.

The policy provides a robust framework for the management and control of capital that underpins business performance and supports the strategic development across the Group.

The policy can be summarised as follows:

Regulatory, legislative and rating agency

Ensure current and future rules are monitored and understood, particularly regarding the definition of capital (quality and fungibility) and various capital requirements.

Definition and monitoring of capital available

- ensure capital is maintained at a sufficient quality in order to meet current and future capital requirements, in accordance with regulatory and rating agency restrictions;
- ensure the Group has a defined risk appetite regarding the quality and tiering of capital required to meet its own internal appetite for solvency;
- ensure there is sufficient capital held within all subsidiaries and branches in order to satisfy local capital requirements (regulatory or otherwise);
- ensure that fungibility restrictions are carefully monitored and controlled to avoid having a detrimental impact on the Group's solvency position, regulatory or otherwise;
- ensure that the level of capital available in the Group, regulatory or otherwise, is monitored on a regular basis in accordance with an agreed process; and
- ensure there is regular monitoring and review of the quality, tiering and fungibility of capital, in order to assess whether the above targets are met on an ongoing basis.

Definition and monitoring of solvency capital requirements

- ensure all current and future capital requirements, regulatory or otherwise, are understood at all times;
- ensure the Group has an agreed definition of an 'Economic Capital Requirement', reflecting its own view of risk;
- ensure the Group has an agreed risk appetite to ensure a satisfactory level of capital coverage on all relevant bases, including a statement of coverage for its economic capital, regulatory capital and rating agency capital;
- ensure the Group has at least enough capital to meet its regulatory and rating agency requirements at all times, and for all relevant subsidiaries and branches;
- ensure all Group capital requirements covered by the risk appetite are calculated and the relevant solvency position reviewed on a regular basis in accordance with an agreed process;
- ensure that relevant stakeholders (i.e. regulators, rating agencies) are informed of any changes to solvency positions in excess of agreed reporting levels; and
- ensure that future capital requirements and projected solvency positions throughout the period of the business plan are assessed in the ORSA process.

Principles around the distribution and raising of capital

- ensure there is a clearly defined process for assessing level of dividends and donations prior to any payment being made;
- ensure there is a clearly defined process for monitoring market conditions and future capital needs in order to assess the requirement and benefit of capital raising or redemptions; and

- ensure the appropriateness for raising or redeeming capital is assessed against all other principles outlined in this policy (e.g. solvency coverage, capital quality).

Principles around the allocation and use of capital

- ensure there is an agreed approach for allocating Economic Capital to different business units and risks;
- ensure the Group has an agreed return on capital target which is aligned to the expectations of all key stakeholders (i.e. the Board, BTL);
- ensure there is an agreed approach to setting and monitoring the return on capital of the Group and each business unit or risk;
- ensure that there is a clear process for determining when a strategic decision should take into account a capital perspective; this must cover all decisions that materially change the use of capital or solvency position; and
- ensure that each such decision considers the impact on solvency, capital allocation, return on capital and any other principles included in this policy.

Reporting

The Board will continue to monitor and maintain the integrity of the Capital Management Policy, Standards and Guidance to ensure they reflect the culture of the business and the regulatory environment in which it operates. The policy is reviewed at least every 5 years by the BG ARC and annually by the Group Chief Actuary.

Business planning

Corporate planning and budgeting is undertaken on an annual basis, covering a three year planning horizon.

E.1.2 Consolidation methodology

In accordance with the PRA Rulebook, the default method is used to calculate the Group's solvency capital. This method fully consolidates all insurance companies, ancillary services companies and insurance holding companies in the Group.

The own funds of EdenTree Investment Management Limited and EdenTree Asset Management Limited, which are investment firms, are calculated in accordance with their own sectoral rules as required by the PRA Rulebook (unaudited). All remaining subsidiaries are consolidated using the adjusted equity method in accordance with the PRA Rulebook.

E.1.3 Fungibility and transferability of group own funds (unaudited as derived from the SCR)

Own funds that cannot be moved because they are required to cover an individual company's local legal or regulatory requirement can only be recognised at the level of the Group to the extent that it contributes to the Group SCR. This is defined in the PRA Rulebook.

In April 2020 the PRA issued SS9/15 which clarified that firms should not consider the solo SCR as restricting the availability of own fund items or assets at the level of the group. Taking this guidance into account has resulted in no unavailable own funds.

Analysis of adjustments to group basic own funds		EIO	ELL	Ansvar Australia	BG Parent	BG Group
		£'000	£'000	£'000	£'000	£'000
Excess of assets over liabilities excluding intra group transactions						**602,711**
Subordinated liabilities						**20,355**
Foreseeable distributions						(4,391)
Restriction due to solo SII requirements						
Notional solo SCR based on group data	**(a)**	204,624	18,570	44,741	29,626	
Notional share of Group SCR	**(b)**	179,334	15,120	39,211	18,408	
Contribution ratio to Group SCR	**(b/a)**	87.6%	81.4%	87.6%	62.1%	
Stand-alone solo SCR	**(c)**	251,917	17,368	44,741	29,626	
Contribution of Solo to Group SCR	**(c x b/a = d)**	**220,782**	**14,142**	**39,211**	**18,408**	
Fungibility restrictions:						
Due to local capital requirement						
Own Funds		-	-	24,432	-	
Minority interest		-	-	-	-	
Due to liquidity		-	-	-	-	
Due to deferred tax asset		-	-	-	-	
	(e)	-	-	24,432	-	
Unavailable at group level	**(If e>d)**	-	-	-	-	-
(Amount in excess of contribution to Group SCR)						
Available Group Own Funds						**618,675**
Unavailability split by tier:						
Tier 1						-
Restricted Tier 1 (Minority interest)						-
Tier 2						-
Tier 3						-
						-

Comparison between Solvency II own funds and equity reported in the financial statements

As explained in section D.1, not all participations are fully consolidated for SII. The revaluation of those participations that are not fully consolidated is therefore shown as a single line entry. The change in value is due to the removal of intra-group transactions, goodwill, intangible assets and prepayments. Life and non-life TPs are valued on a SII basis as described in section D.2.

Reconciliation from IFRS net assets to Solvency II own funds	2024	2023
	£'000	£'000
Equity as reported in IFRS Financial Statements	685,625	666,666
Revalue participations	(32,920)	41,632
Revalue life technical provisions *	11,233	66,087
Revalue non-life technical provisions *	41,611	(20,990)
Revalue subordinated debt	4,756	4,671
Remove deferred commission income and deferred acquisition costs	2,415	2,240
Remove goodwill and intangible assets	(81,660)	(145,363)
Remove prepayments and other items with no fair value	(18,881)	(24,594)
Impact of revaluation on deferred tax	(8,793)	(1,071)
Impact of valuing investment firm using sectoral rules (unaudited)	(675)	(304)
Solvency II valuation of excess of assets over liabilities	602,711	588,974
Include subordinated Liabilities in basic own funds	20,355	21,182
Foreseeable dividends & distributions	(4,391)	(12,391)
Group availability restriction	-	-
Solvency II Valuation of own funds	618,675	597,765

***** - Risk margin thereof unaudited***

The following are inadmissible or have no expected future cash flows and are removed from the SII valuation:

- deferred income and deferred acquisition costs;
- goodwill and intangible assets; and
- prepayments.

The difference between the SII value of net assets and the value used for the calculation of tax gives rise to an adjustment to the deferred tax asset and liability. This is covered in sections D.1 and D.3.

As EdenTree Investment Management Limited and EdenTree Asset Management limited are investment firms, their net assets are removed from the SII consolidation and replaced by own funds valued in accordance with their own sectoral rules (unaudited).

As noted at the beginning of this section, foreseeable distributions are deducted from SII own funds, subordinated liabilities recognised as tier 2 own funds and any group availability restriction deducted.

E.1.4 Movement in own funds compared to prior period

A copy of the QRT 'IR.23.01.04 – Own Funds' is included in Appendix 7. The table below is a summary of own funds by type, with comparison to the prior year:

Analysis of Own Funds	Total	Tier 1		Tier 2	Tier 3
		Unrestricted	Restricted		
2024	**£'000**	**£'000**	**£'000**	**£'000**	**£'000**
Ordinary share capital	20,000	20,000	-	-	-
Minority interests	101,815	-	101,815	-	-
Subordinated Liabilities	20,355	-	-	20,355	-
Amount equal to deferred tax asset	779	-	-	-	779
Reconciliation reserve	475,726	475,726	-	-	-
(Net of non-available items)	**618,675**	**495,726**	**101,815**	**20,355**	**779**
2023					
Ordinary share capital	20,000	20,000	-	-	-
Minority interests	101,815	-	101,815	-	-
Subordinated Liabilities	21,182	-	-	21,182	-
Amount equal to deferred tax asset	2,763	-	-	-	2,763
Reconciliation reserve	452,003	452,003	-	-	-
(Net of non-available items)	**597,763**	**472,003**	**101,815**	**21,182**	**2,763**
Movement in own funds					
Ordinary share capital	-	-	-	-	-
Minority interests	-	-	-	-	-
Subordinated Liabilities	(827)	-	-	(827)	-
Amount equal to deferred tax asset	(1,984)	-	-	-	(1,984)
Reconciliation reserve	23,723	23,723	-	-	-
(Net of non-available items)	**20,912**	**23,723**	**-**	**(827)**	**(1,984)**

The ordinary share capital is called up, issued and fully paid, and is classified as unrestricted tier 1 capital as it meets the relevant requirements of the PRA Rulebook.

The minority interest is in respect of preference share capital issued by EIO. The minority interest is classified as restricted tier 1 capital as this is the tier classification of the underlying preference share capital of EIO.

Subordinated liabilities issued by EIO during the year have been recognised as tier 2 capital as it meets the relevant requirements of the PRA Rulebook.

The reconciliation reserve is primarily retained earnings from the financial statements adjusted for differences in valuation between the financial statements and SII, as covered in section D.

The movement in unrestricted tier 1 capital is in respect of the reconciliation reserve, including the movement in sectoral valuation (unaudited) of EdenTree IM and EdenTree AM, the Group's investment firms, and changes in the non-availability of own funds at a Group level.

The table below shows the key movements in own funds by tier between the current and prior year:

Movement in Own Funds	Total	Tier 1		Tier 2	Tier 3
		Unrestricted	Restricted		
	£'000	£'000	£'000	£'000	£'000
Prior year balance	**597,763**	**472,003**	**101,815**	**21,182**	**2,763**
IFRS total comprehensive income	56,597	49,155	-	-	7,442
Preference dividends paid to minority interest	(10,074)	(10,074)	-	-	-
Acquisition of minority interest	(2,814)	(2,814)	-	-	-
Charitable grant paid net of tax relief	(24,750)	(24,750)	-	-	-
Movement in SII valuation of subordinated Liabilities	85	85	-	-	-
Movement in SII valuation of non-life technical provisions *	62,601	62,601	-	-	-
Movement in SII valuation of life technical provisions *	(54,854)	(54,854)	-	-	-
Movement in SII revaluation of participations	(74,552)	(74,552)	-	-	-
Movement in other SII deductions & revaluations	77,592	77,592	-	-	-
Movement in SII calculation of deferred tax	(7,722)	(711)	-	-	(7,011)
Movement in sectoral revaluation of investment firm (unaudited)	(371)	(371)	-	-	-
Movement in non-availability of Own Funds at group level	-	-	-	-	-
Subordinated liability recognised as basic own funds	(826)	2	-	(828)	-
Total movement for year	**20,912**	**21,309**	**-**	**(828)**	**431**
Current year balance	**618,675**	**493,312**	**101,815**	**20,354**	**3,194**

**** - Risk margin thereof unaudited***

The £56.6m IFRS total comprehensive income is reported in the Group's financial statements and includes profit after tax of £59.6m, actuarial losses of £1.1m in respect of the Group's retirement benefit obligations and £1.9m of losses on net investment hedges currency translation and property.

Two key components of profit after tax are underwriting performance, covered in section A.2, and investment performance, covered in section A.3. Actuarial gains and currency translation are covered in section A.4.

The adjustment to TPs has changed compared to prior year due to movement in discount rates, and for life TPs changes in the real interest rates as covered in section D.2. The movement in other SII deductions includes adjustments for items that are inadmissible for SII such as prepayments, goodwill and intangible assets, which increased compared to last year. The movement in SII adjustment for deferred tax reflects the movement in adjustment for TPs and other SII adjustments.

E.1.5 Transitional arrangements

There are no own fund items that are subject to transitional arrangements.

E.1.6 Ancillary own funds

Approval has not been sought for any form of ancillary own funds. There is no unpaid share capital in issue and no material letters of credit, guarantees or any other legally binding commitments have been identified or recognised.

Eligible amount of own funds available to cover the Solvency Capital Requirement

Analysis of eligible own funds available to cover Group SCR	2024 £'000	2023 £'000
Own funds eligible to cover SCR:		
Unrestricted tier 1 capital	477,914	455,054
Restricted tier 1 capital	101,815	101,815
Total eligible tier 1 capital	**579,729**	**556,869**
Restricted tier 1 relegated to tier 2	-	-
Other tier 2 capital	20,355	21,182
Total eligible tier 2 capital	**20,355**	**21,182**
Eligible tier 3 capital	**779**	**2,763**
Total eligible own funds*	**600,863**	**580,814**
Ineligible own funds	**-**	**-**
Total own funds*	**600,863**	**580,814**

**** - Including own funds of investment firms (unaudited)***

The restricted tier 1 own funds cannot amount to more than 25% of unrestricted tier 1 own funds. The remainder is classified as tier 2 own funds. Tier 2 own funds cannot amount to more than 50% of the SCR and tier 3 own funds cannot amount to more than 15% of the SCR.

Eligible amount of own funds available to cover the Minimum Consolidated Group SCR

Analysis of eligible own funds available to cover minimum consolidated Group SCR	2024 £'000	2023 £'000
Own funds eligible to cover MCR:		
Unrestricted tier 1 capital*	477,914	455,054
Restricted tier 1 capital	101,815	101,815
Total eligible tier 1 capital	**579,729**	**556,869**
Restricted tier 1 relegated to tier 2	-	-
Tier 2 capital	19,713	18,603
Total eligible tier 2 capital	**19,713**	**18,603**
Total eligible own funds*	**599,442**	**575,472**
Ineligible own funds*	**1,421**	**5,342**
Total basic own funds after deductions	**600,863**	**580,814**

**** - Excluding own funds of investment firms (unaudited)***

The restricted tier 1 own funds cannot amount to more than 20% of total tier 1 own funds, which equates to 25% of unrestricted tier 1 own funds. The remainder can be treated as tier 2 own funds. Tier 2 capital cannot amount to more than 20% of the minimum group SCR and tier 3 capital cannot be used to cover the minimum consolidated group SCR.

The ineligible own funds of £1.4m to meet the minimum consolidated group SCR represents the own funds classified as tier 3 plus the tier 2 own funds in excess of the 20% limit.

E.2 Solvency Capital Requirement (SCR) & Minimum Capital Requirement (MCR)

E.2.1 Consolidated group SCR (unaudited)

The SCR is the amount of capital that the Group is required to hold as required by the PRA Rulebook. The Group uses a Partial Internal Model (PIM), which has been approved for use by the PRA, to calculate the SCR. The consolidated Group SCR adds to this the capital requirements of EdenTree IM and EdenTree AM, which are calculated in accordance with their own sectoral rules (unaudited), in line with the PRA Rulebook.

The PIM is described in section E.4. A breakdown of the SCR elements applicable to the Group is given in the following section.

As at 31 December 2024 the SCR for the Group was £257.6m, and is still subject to supervisory assessment.

A copy of the QRT 'IR.25.05.01 – Solvency Capital Requirement components' is reproduced in Appendix 8.

E.2.2 Minimum group SCR

The minimum consolidated Group SCR, as defined in the PRA Rulebook and per the Group Solvency Guidelines is the sum of:

- the MCR of each UK insurance undertaking within the Group; and
- the local capital requirement of third country insurance undertakings.

The table below provides a breakdown of the Group minimum consolidated SCR (unaudited as this is derived from the SCR):

Minimum group solvency capital requirement	2024	2023
	£'000	£'000
MCR of Ecclesiastical Insurance Office plc	69,792	62,800
MCR of Ecclesiastical Life Limited	4,342	3,763
Local regulatory requirement of Ansvar Insurance ltd	24,432	26,454
Minimum group solvency capital requirement	**98,566**	**93,017**

The minimum group SCR has increased following increases in the MCR of EIO. ELL's MCR has increased in line with its increase in SCR. The local Australian Prudential Regulation Authority (APRA) requirement of the Group's Australian subsidiary has reduced due to impact of FX rates.

SCR by risk module and Changes to the SCR and minimum group SCR compared to the prior period (unaudited)

Solvency Capital Requirement	2024	2023
	£'000	£'000
Market risk	198,771	228,866
Counterparty default risk	38,330	32,417
Non-life underwriting risk	159,294	161,804
Life underwriting risk	2,869	2,009
Operational risk	35,640	33,432
Other risks	5,294	14,421
Diversification	(193,043)	(210,006)
SCR before adjustments	247,155	262,943
Loss absorbing capacity of deferred tax	(37,300)	(34,200)
Other adjustments	42,219	34,145
Consolidated SCR	252,074	262,887
Sectoral capital requirement of investment firm	5,500	2,587
Group SCR	**257,574**	**265,474**
Coverage Ratio	**240%**	**225%**

Overall, the SCR has decreased modestly over the year driven by a reduction in Market risk.

The underlying reduction in Market risk is driven by an increase in expected investment returns following increases in nominal rates (increased model view of profit), and a significant reduction in Pension Fund risk due to a further increase in the unrestricted surplus position and the execution of a de-risking strategy. Market Risk has also reduced over the year as increased ownership of Lloyd & Whyte (L&W) has reduced the Group's consolidated exposure to the BG to L&W loan.

Counterparty default risk has increased over the year. Whilst counterparty default rates have been updated, this increase is driven by increased exposure via business growth and a re-calibration of premium payment patterns.

Non-life underwriting risk has decreased modestly due to economic factors and a general improvement in underlying profitability. Higher risk-free rates have increased the discounting benefit on insurance liabilities, and a strengthening in GBP has reduced the impact of overseas insurance losses. Refreshed Business Plans and an improved reinsurance result have increased expected profits (downwards driver on capital) albeit this is partly offset by increased risk, most notable on Catastrophe risk (mostly due to exposure growth).

Life underwriting risk has risen in the period as the ELLIS product continues to grow, as well as the impact of an increase in yields in the period.

Operational risk has increased with annual review of underlying scenarios reflecting both business growth and inflationary increases.

'Other Risks' comprises of longevity risk, relating to the pension fund, and risk pertaining to the SII Risk Margin. The decrease in this line over the year relates to a decrease in longevity risk, which is zero at end of 2024, reflecting the very strong surplus position of the pension fund.

'Other adjustments' have increased over the year largely due to an increase in Group unallocated expenses, supporting business growth.

E.2.3 Group diversification (unaudited)

As shown above there is significant diversification benefit between risk types within the Group SCR.

This is mainly driven by diversification between market risk and non-life underwriting risk which are the two biggest risks but are largely unrelated to each other. This is because non-life underwriting risk includes material natural catastrophe and latent reserving risks which have limited link to the economy, resulting in significant diversification benefit with market risks.

Within market risk, the pension fund is another key source of diversification for the Group. This is because market risk is largely driven by an equity led economic downturn, however the risk relating to pension liabilities creates a benefit in an economic downturn, through higher discount rates.

Within non-life underwriting risk there is also material diversification due to the geographical diversification between the territories insured, namely between Canada, Australia and the core UK insurance businesses.

E.2.4 Use of simplified calculations, Undertaking specific parameters and the use of the option provided for in the PRA Rulebook

No simplifications, undertaking-specific parameters or the duration-based equity sub-module have been used in calculating the SCR for the Standard Formula element of the Group's PIM.

E.3 Use of the duration-based equity risk sub-module in the calculation of the SCR

The duration-based equity risk sub-module has not been used.

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

For the purposes of calculating its SCR, the Group uses a PIM, as approved by the PRA. The following sections describe various aspects of this Model.

E.4.1 Use of the Partial Internal Model

The PIM is a key tool within the risk management system. It plays a central role in the management of risks. In addition to its primary role of calculating the regulatory and internal capital requirements, the Model is also widely used and fully integrated into decision making processes.

The PIM provides support and justification for a variety of key business processes. These include, but are not limited to:

- setting of, and monitoring the Risk Appetite;

- informing decisions relating to business strategy;
- output for the ORSA and other risk management analysis;
- setting of business plan assumptions;
- setting of investment strategy; and
- reinsurance programme design and strategy.

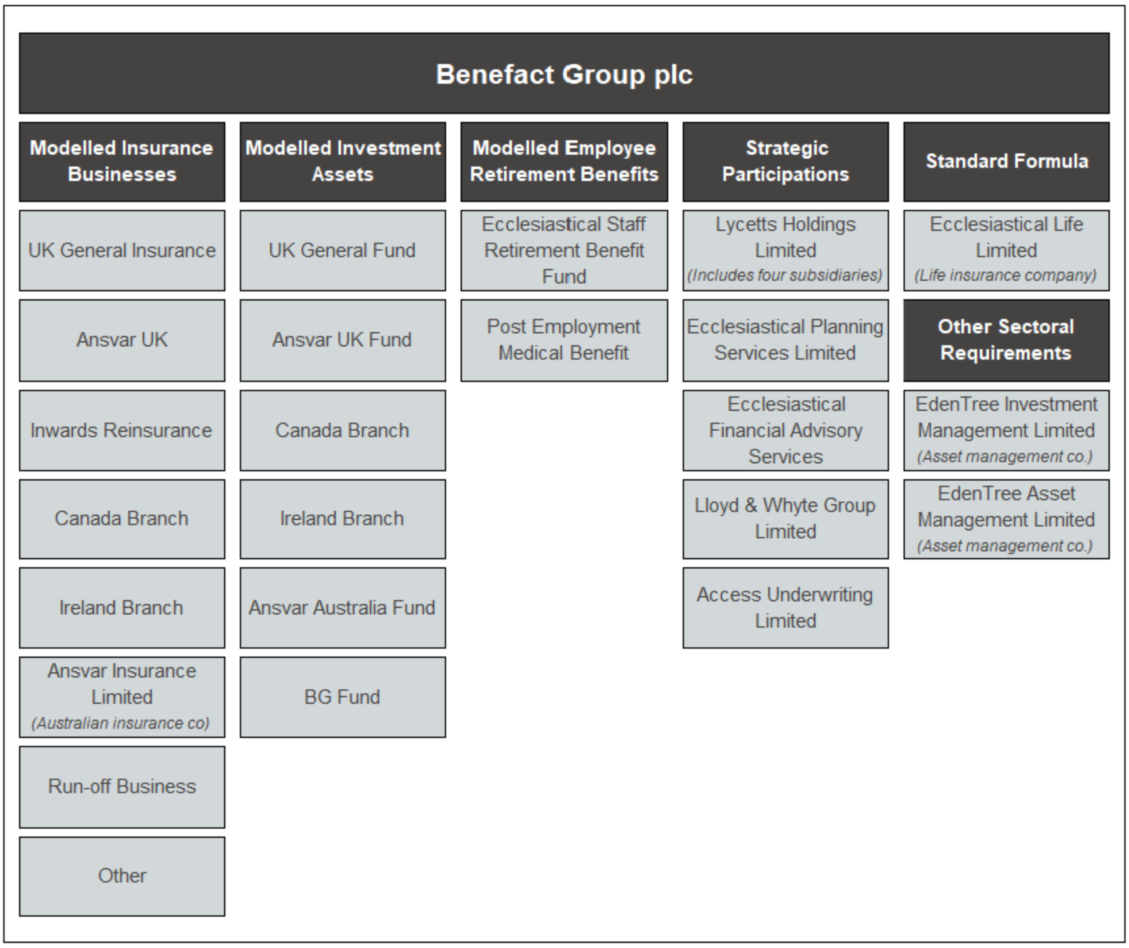
E.4.2 Scope of the internal model

The PIM is intended to capture all the material financial risks within the Group. The most material risks relating to the general insurance business and market risk are captured within a core stochastic model.

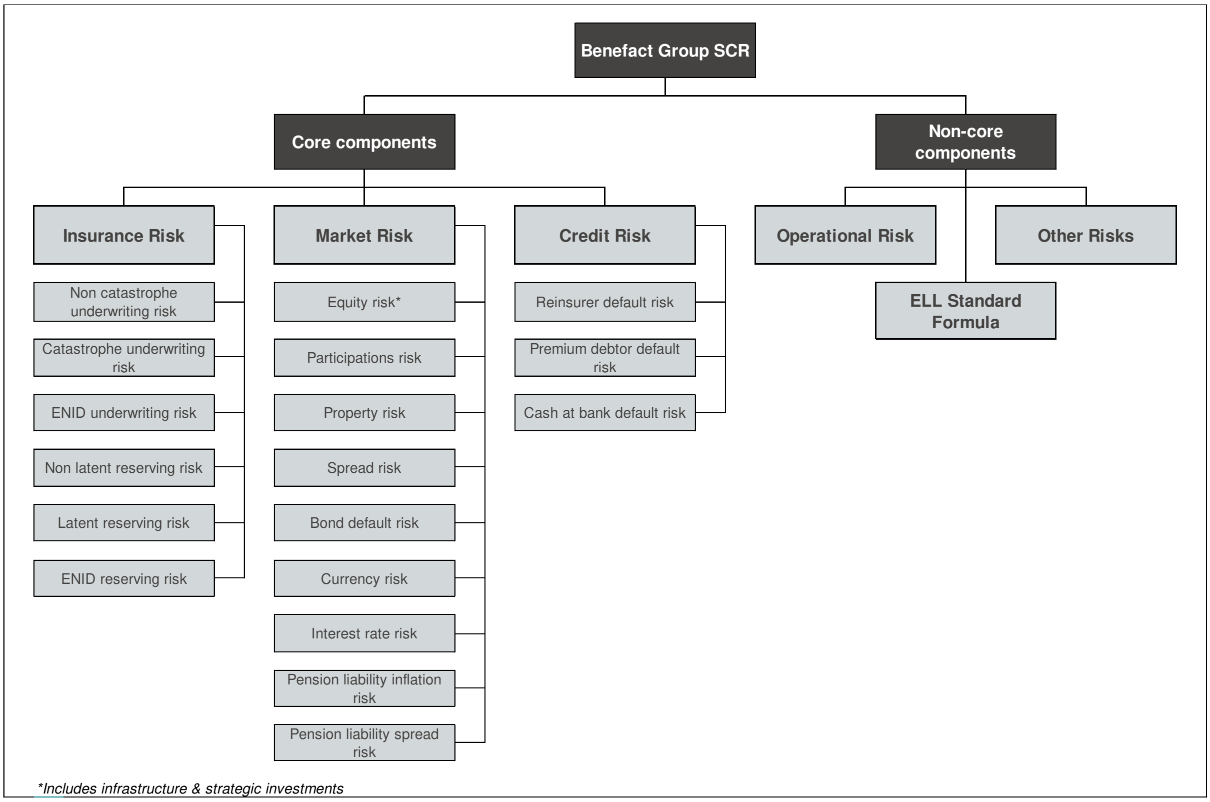
A number of additional 'non-core' risks are then aggregated with the stochastically modelled requirement at the final stage. These risks use a combination of stochastic and scenario-based approaches. This also includes the SCR for ELL which is calculated separately using the Standard Formula.

Finally, model adjustments are applied in order to derive the final capital requirement. This includes the addition of the capital requirements for two non-insurance subsidiaries, EdenTree IM and EdenTree AM, whose capital requirement are calculated in accordance with the relevant sectoral rules.

The diagram below illustrates the business unit scope of the PIM:



The diagram below illustrates the component risks within the PIM:



E.4.3 Methods used in the partial internal model

Integration of the partial internal model

The technique for integrating the ELL Standard Formula result is consistent with Integration Technique 2 in the PRA Rulebook. This method involves aggregation of units from the model with modules of the Standard Formula. Correlations between modules and sub-modules calculated in the Standard Formula are set equal to those dictated within the Standard Formula. Other correlations required are subject to specific criteria (e.g. between -1 and 1) and set in such a way that the overall SCR could not be higher.

Calculation of the probability distribution forecast and the SCR

Within the core stochastic model the quantitative impact of key drivers of risk such as gross claims and investment returns are allowed to vary according to a set of calibrated input parameters. Correlations are applied so that the relationships between inputs are captured (e.g. claims in one insurance niche are likely to occur at the same time as claims in a related niche). The model then randomly varies all of these drivers of risk to produce a probability distribution forecast for the Group’s profit or loss over a one year period.

The model is run a large number of times (100,000 simulations) in order to determine many potential outcomes.

Operational risk and other risks are modelled independently then aggregated with the core only capital requirement to produce the total SCR. This method is valid due to these risks being largely independent of the other high-level risk types.

Risk measure and time period

The SCR is defined to be the 99.5th value at risk of own funds over a one year time period. This is commonly referred to as the '1 in 200 Value at Risk (VaR)' and effectively represents the '1 in 200' worst loss generated from the simulated results, which would be expected to be exceeded only once in 200 years. The risk measure (1 in 200 or 99.5th VaR) and one year time period used within the PIM have been selected to agree to that set out in the PRA Rulebook.

E.4.4 Data used in the Partial Internal Model

Calibration of the Model relies on a wide range of data sources, both internal and external, including:

- historic claims data;
- current and historic policy data;
- exposure information;
- financial market data; and
- asset valuation data.

In most cases historical data is used in the calibration of risk distributions. However, where necessary, historic data is supplemented with expert judgement to ensure data limitations are appropriately allowed for.

In calculating both market risk and catastrophe risk the Group relies on the appropriateness of market-standard external models.

The Group has implemented a data governance framework to ensure that robust and consistent controls of the quality and reliability of both internal and external data used for reporting, capital management, risk management and other decision making exist and meet the requirements of the regulators and the Group's stated risk appetite.

E.4.5 Main differences between any internal model used at an individual level and group

The methodology and risk type scope of the (Partial) Internal Model is the same for all undertakings within the Group.

E.4.6 Differences in methodologies between the PIM and Standard Formula

This section compares the methodologies and assumptions underlying each of the risk modules within the Model and the Standard Formula. The key difference is that the Model methodology and parameterisation is more tailored to BG's own risk profile than the Standard Formula.

Model Risk Category	Standard Formula Sub component(s)	Standard Formula approach	Partial Internal Model
Non-Life Underwriting Risk	Premium & Reserve, Catastrophe and Lapse	▪ For premium & reserve risk, market average volatility factors are applied to a relevant volume metric, by line of business. ▪ Net earned premiums provide the volume metric for premium risk, with net best estimate claims reserves providing the volume metric for reserve risk. ▪ No account is taken of the relative scale or nature of business within each line, but geographical diversification is included. ▪ Catastrophe losses are largely based on shocks applied to Sums Insured and Gross Premiums within different geographical zones. The reinsurance mitigation effect is calculated based on consideration of single events. ▪ Lapse risk is modelled based on lapsing a proportion of business where this is contributing profit to the opening reserves.	▪ Model classes are split to a lower level of granularity than the SII lines of business (e.g. to insurance niche), to better reflect the risk profile of particular territories, and where relevant, customer groupings. ▪ For premium risk, for each class the model simulates uncertainty in premium rates, gross claims and expenses. Reinsurance contracts are applied to generate reinsurance recoveries in relation to the simulated claims. ▪ Reserve risk is calibrated separately for non-latent and latent reserve risk within a class, where relevant. Non latent reserve risk calibrates future modelled claims in respect of exposure before the base date using past claims experience. Latent reserve risk uses frequency and severity modelling for abuse and asbestos related claims. ▪ Gross catastrophe underwriting loss experience is calculated by applying simulated events from external vendor models to the Group's own exposure, taking into account the range of specific events and both single or accumulating losses. Reinsurance recoveries are calculated and the impact of reinstatement premiums included. ▪ Additional scenarios relating to potential events not in data (ENID) are modelled, for example terrorism events and new latent claims. ▪ Claims inflation is projected using relevant Economic Scenario Generator (ESG) market indices together with a superimposed inflation to allow for additional volatility in claim payments due to other inflationary factors, and step changes. ▪ All risks are modelled to ultimate, with an adjustment applied to reflect the amount of risk that would emerge over the one year period. ▪ The expected profitability of the business explicitly impacts the level of capital requirement. ▪ The model captures the change in technical provisions on the closing balance sheet, including the assumed profitability of unearned and bound business following a shock underwriting event, and movements in risk margin. ▪ Due to low materiality, lapse risk is not included within the model scope.

Model Risk Category	Standard Formula Sub component(s)	Standard Formula approach	Partial Internal Model
Life Underwriting Risk	Longevity, Life Expense	▪ A shock is applied representing an immediate and permanent decrease in mortality, irrespective of policyholder age or duration. ▪ A shock is applied to the opening best estimate expense reserves, in addition to a shock to the future expense inflation rate. ▪ These factors do not distinguish between the scale of a portfolio, and make no allowance for change in life business risk margin.	▪ The Standard Formula risk charge for ELL, the Group's life business, is integrated with the Partial Internal Model (along with the market and counterparty risk charges of the life company) using a linear correlation matrix. ▪ Note the Standard Formula operational risk charge for ELL is simply added with no allowance for diversification.
Market Risk: (excluding Pension Risk)	Equity	▪ Equity shocks vary based on classification as Type 1 (listed in EEA or OECD countries) and Type 2 (other) equities. ▪ A symmetric adjustment is applied to the base shocks to reduce pro-cyclicality. ▪ The shock is assumed to be instantaneous at the balance sheet, reflecting derivative protection held at that date.	▪ Market returns on equity indices for relevant global economies over a one year time horizon are simulated using the externally provided ESG (this enables correlations between economies to be explicitly captured and between each different market risk type) ▪ The Group's equity holdings are each mapped to a relevant economy and the ESG parameters applied, together with Capital Asset Pricing Model (CAPM) assumptions, to project returns for the portfolio. ▪ Volatility adjustments are applied, where relevant, to infrastructure and strategic investments. ▪ No symmetric adjustment is applied however the ESG is updated at least annually and is designed to reflect current market conditions. ▪ Derivatives held to mitigate this risk are modelled based on assumed levels of protection that are supported by management actions.
	Participations	▪ Strategic Participations are modelled similarly to equities, with a lower shock.	▪ A beta parameter is calibrated and applied to the relevant economy's equity index to reflect relatively low volatility of participation returns. ▪ In both the Internal Model and Standard Formula, the following business units are modelled as strategic participations: Access (broker), Lloyd & Whyte (broker), Lycetts (broker), EPSL (funeral planning) and EFAS (financial advisory).
	Property	▪ A single instantaneous shock factor is applied to the value of all properties at the balance Sheet date.	▪ The ESG simulates property returns for each economy. A beta parameter is calibrated and applied to adjust the level of risk, which broadly aligns to the resulting charge to the Standard Formula.

Model Risk Category	Standard Formula Sub component(s)	Standard Formula approach	Partial Internal Model
	Spread	▪ A stress is applied based upon both the bond credit quality and duration to maturity. This stress accounts for both the bond spread risk and the bond default risk. ▪ The stress for this risk is not applied to Government bonds.	▪ Corporate bond returns are based on a discounted cash flow model, using market risk-free rates with an additional credit spread to account for risk, by term. The ESG simulates the credit spread applicable to corporate bonds, distinguishing by economy, credit rating and duration. ▪ The model distinguishes bond default risk separately from spread risk by simulating losses from defaults which occur during the year, allowing for recoveries. The ESG provides a transition matrix which is applied to determine how bonds change credit rating and/or default during the year, with migration risk being captured within spread risk.
	Currency	▪ A single instantaneous shock is applied to the currency rates used to value the opening net asset value position for each foreign currency exposure (net of derivative protection at the opening date).	▪ This risk is quantified by applying the ESG's simulated exchange rate movements to opening net assets by currency, and therefore includes diversification between currencies. ▪ Profits and/or losses from currency hedging contracts are also included.
	Interest Rate	▪ A prescribed upward and downward stress, by duration of cash flow, is applied to the PRA risk-free yield curve. These stressed yield curves are then applied to aggregate net fixed interest opening cash flows with the Interest Rate risk defined as the larger decrease in net asset value resulting from the two calculations.	▪ The ESG simulates risk-free yield curves for each relevant economy. To these, an Inflation Volatility Adjustment may be applied, by expert judgement. The opening and closing fixed interest asset and liability cash flows are valued by applying the appropriate yield curves to determine a change in net asset value. For insurance liabilities, the yield curve is aligned to the PRA curve. ▪ The use of the closing cash flows therefore takes into account change in liabilities profile from insurance risk over the year, which is not captured by the Standard Formula module.
	Concentrations	▪ A formula based charge is derived from exposures, rating and total assets held.	▪ No separate risk type is required as the risks within each individual asset holding are captured via Counterparty risk and the diversification available between asset risks.
Market Risk: (Pension Risk)	N/A (combined with market risks above)	▪ The assets and liabilities relating to retirement benefit schemes are included in the relevant market risk modules.	▪ In addition to including Pension Fund assets and liabilities in the market risk modelling, Pension liabilities inflation risk is explicitly modelled using ESG inflation curves over the 1 year horizon. ▪ Risks associated with the allowable spread within pension liabilities discount rate are captured via an explicit adjustment to the ESG simulated spreads where appropriate. ▪ The level of pension surplus recognised is restricted in line with current accounting principles.

Model Risk Category	Standard Formula Sub component(s)	Standard Formula approach	Partial Internal Model
Counterparty Default Risk	Type 1 and Type 2 exposures	▪ Type 1 (rated) exposures are calculated from probability of default and loss given default ▪ Type 2 (unrated) exposures are given a % charge, distinguishing an increased charge for those which relate to balances > 3 months overdue.	▪ Three modules are used to capture different default risk characteristics relating to reinsurers, intermediaries and banks. ▪ Reinsurer defaults consider the term to payment in addition to the simulated reinsurer balances, credit rating and loss given default. As a simplification this risk is all assumed to emerge in the first year. ▪ Premium Debtor Default Risk is aligned with the Standard Formula Type 2 calculation, given the small magnitude of the underlying exposure and the low materiality of this risk. ▪ Bank default is modelled similarly to reinsurers, but calibrated to the risk of default occurring within the first year.
Operational Risk	N/A	▪ The higher of the charge derived from factors applied to premiums and reserves is added to the base SCR. ▪ This represents the diversified Operational risk charge, with no separate quantification of an undiversified charge.	▪ Bespoke scenarios, covering the key operational risk exposures of the Group, such as data loss or systems failure, are constructed and quantified in consultation with business risk experts. ▪ These are combined using correlations between the scenarios to produce on overall Operational risk distribution.
Other Risks	N/A	▪ N/A	▪ This category typically relates to smaller risks which are not integrated into the stochastic modelling or attributable to other categories. ▪ This includes a deterministic scenario for longevity risk in the pension scheme, applied as a stress to current and future mortality rates.
Loss Absorbing Capacity of Deferred Tax	LACDT	▪ The tax adjustment is calculated based on an instantaneous loss represented by the diversified components making up the standard formula SCR.	▪ The movement in tax balances is calculated across the distribution to identify the after-tax SCR. ▪ The LACDT is capped within each entity at the level of available net deferred tax liabilities and loss carry-back.
Other Adjustments	N/A	▪ N/A	▪ This category relates to income and expenses that are not within the other risk components. These are calibrated based on the business plan, adjusted where appropriate to reflect the values that would be expected to occur during the disaster year, where supported by management actions. ▪ The result is adjusted directly against the SCR.
Aggregation	N/A	▪ A linear correlation matrix is applied between the risk modules.	▪ Sub-risks within the core risks (Insurance Risk, Market Risk and Credit Risk) are aggregated to form a multivariate distribution. This uses a sophisticated copula based correlation approach to produce an aggregate distribution from which the SCR is calculated. ▪ Operational risk, Other risks and Other adjustments are aggregated with the core model using linear correlation approaches.

E.5 Non-compliance with the Minimum Group SCR and non-compliance with the SCR

E.5.1 Minimum Group SCR non-compliance

There has been no breach of the minimum group SCR during the reporting period.

E.5.2 SCR non-compliance

There has been no breach of the SCR during the reporting period.

E.6 Any other information

No further information regarding the capital management of the Group is required.

Appendix 1 - QRT IR.02.01.02 Balance Sheet

IR.02.01.02

Balance sheet

		Solvency II value
	Assets	C0010
R0030	Intangible assets	0
R0040	Deferred tax assets	779
R0050	Pension benefit surplus	17,552
R0060	Property, plant & equipment held for own use	34,284
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	1,056,859
R0080	*Property (other than for own use)*	128,563
R0090	*Holdings in related undertakings, including participations*	49,548
R0100	*Equities*	138,983
R0110	*Equities - listed*	39,237
R0120	*Equities - unlisted*	99,746
R0130	*Bonds*	475,685
R0140	*Government Bonds*	293,828
R0150	*Corporate Bonds*	181,302
R0160	*Structured notes*	0
R0170	*Collateralised securities*	555
R0180	*Collective Investments Undertakings*	257,088
R0190	*Derivatives*	4,150
R0200	*Deposits other than cash equivalents*	2,841
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	124,022
R0230	Loans and mortgages	30,043
R0240	*Loans on policies*	0
R0250	*Loans and mortgages to individuals*	
R0260	*Other loans and mortgages*	30,043
R0270	Reinsurance recoverables from:	169,917
R0280	*Non-life and health similar to non-life*	169,917
R0315	*Life and health similar to life, excluding index-linked and unit-linked*	
R0340	*Life index-linked and unit-linked*	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	55,887
R0370	Reinsurance receivables	7,712
R0380	Receivables (trade, not insurance)	9,487
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	104,889
R0420	Any other assets, not elsewhere shown	8,071
R0500	**Total assets**	1,619,502

		Solvency II value
	Liabilities	C0010
R0505	Technical provisions - total	852,754
R0510	*Technical provisions - non-life*	680,609
R0515	*Technical provisions - life*	172,144
R0542	Best estimate - total	822,049
R0544	*Best estimate - non-life*	650,320
R0546	*Best estimate - life*	171,730
R0552	Risk margin - total	30,704
R0554	*Risk margin - non-life*	30,290
R0556	*Risk margin - life*	415
R0565	Transitional (TMTP) - life	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	5,979
R0760	Pension benefit obligations	4,332
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	44,498
R0790	Derivatives	215
R0800	Debts owed to credit institutions	24,573
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	
R0830	Reinsurance payables	
R0840	Payables (trade, not insurance)	64,085
R0850	Subordinated liabilities	20,355
R0860	*Subordinated liabilities not in Basic Own Funds*	
R0870	*Subordinated liabilities in Basic Own Funds*	20,355
R0880	Any other liabilities, not elsewhere shown	
R0900	**Total liabilities**	1,016,791
R1000	**Excess of assets over liabilities**	602,711

Appendix 2 - QRT IR.05.04.02 Non-life premiums, claims and expenses by line of business (Unaudited)

Appendix 3 - QRT IR.05.03.02 Life premiums, claims and expenses by line of business (Unaudited)

IR.05.03.02

Life income and expenditure

		Insurance with profit participation	Index-linked and unit-linked insurance	Life annuities	Non-life annuities	Other life insurance	Health insurance	Total life and health
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
	Premiums written							
R0010	*Gross direct business*		46,690			-271		46,419
R0020	*Gross reinsurance accepted*							0
R0030	Gross	0	46,690	0	0	-271	0	46,419
R0040	*Reinsurers' share*							0
R0050	Net	0	46,690	0	0	-271	0	46,419
	Claims incurred							
R0110	*Gross direct business*		12,383			5,033		17,416
R0120	*Gross reinsurance accepted*							0
R0130	Gross	0	12,383	0	0	5,033	0	17,416
R0140	Reinsurers' share							0
R0150	Net	0	12,383	0	0	5,033	0	17,416
	Expenses incurred							
R0160	*Gross direct business*		1,047			316		1,363
R0170	*Gross reinsurance accepted*							0
R0180	Gross	0	1,047	0	0	316	0	1,363
R0190	Reinsurers' share							0
R0200	Net	0	1,047	0	0	316	0	1,363
R0300	Other expenses							0
	Transfers and dividends							
R0440	Dividends paid							0

Appendix 4 - QRT IR.05.02.01 Non-life premiums, claims and expenses by country (Unaudited)

IR.05.02.01

Premiums, claims and expenses by country: Non-life insurance and reinsurance obligations

		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
		C0010	C0020	C0030	C0040	C0050	C0060	C0070
R0010			CA	IE	AU			
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
	Premiums written							
R0110	Gross - Direct Business	392,911	101,556	28,930	92,074			615,470
R0120	Gross - Proportional reinsurance accepted	21,859	0	0				21,859
R0130	Gross - Non-proportional reinsurance accepted		0	0				0
R0140	Reinsurers' share	176,018	27,965	8,835	50,669			263,487
R0200	Net	238,751	73,591	20,095	41,405			373,842
	Premiums earned							
R0210	Gross - Direct Business	375,919	101,881	27,657	93,140			598,598
R0220	Gross - Proportional reinsurance accepted	21,457	0	0				21,457
R0230	Gross - Non-proportional reinsurance accepted		0	0				0
R0240	Reinsurers' share	172,789	28,400	8,592	52,388			262,168
R0300	Net	224,588	73,482	19,065	40,753			357,887
	Claims incurred							
R0310	Gross - Direct Business	121,614	35,980	10,784	57,746			226,124
R0320	Gross - Proportional reinsurance accepted	29,860	0	0				29,860
R0330	Gross - Non-proportional reinsurance accepted		0	0				0
R0340	Reinsurers' share	69,796	13,388	5,105	39,297			127,585
R0400	Net	81,678	22,593	5,679	18,449			128,399
R0550	**Net expenses incurred**	85,437	36,572	9,567	26,824			158,399

Appendix 5 - QRT IR.05.02.01 Life premiums, claims and expenses by country

IR.05.02.01

Premiums, claims and expenses by country: Life insurance and reinsurance obligations

		C0150	C0160	C0170	C0180	C0190	C0200	C0210
		Home Country	Top 5 countries (by amount of gross premiums written) - life obligations					Total Top 5 and home country
R1400								
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
	Premiums written							
R1410	Gross	46,419						46,419
R1420	Reinsurers' share	0						0
R1500	Net	46,419						46,419
	Premiums earned							
R1510	Gross	46,419						46,419
R1520	Reinsurers' share	0						0
R1600	Net	46,419						46,419
	Claims incurred							
R1610	Gross	17,416						17,416
R1620	Reinsurers' share	0						0
R1700	Net	17,416						17,416
R1900	**Net expenses incurred**	1,363						1,363

Appendix 6 – QRT IR.22.01.22 Impact of long term guarantees, measures and transitionals

IR.22.01.22

Impact of long term guarantees measures and transitionals

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
R0010	Technical provisions	852,754	0	0	1,077	0
R0020	Basic own funds	600,863	0	0	-1,077	0
R0050	Eligible own funds to meet Solvency Capital Requirement	618,675	0	0	-1,077	0
R0090	Solvency Capital Requirement	257,574	0	0	-40	0

Appendix 7 – QRT IR.23.01.04 Own funds

IR.23.01.04
Own Funds

Basic own funds before deduction for participations in other financial sector

	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

R0830	**Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A**	[illegible]

	Reconciliation reserve	[illegible]
R0700	Excess of assets over liabilities	[illegible]
R0710	Own shares (held directly and indirectly)	
R0720	Foreseeable dividends, distributions and charges	[illegible]
R0725	Deductions for participations in financial and credit institutions	[illegible]
R0730	Other basic own fund items	[illegible]
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0750	Other non available own funds	
R0760	**Reconciliation reserve**	[illegible]

Appendix 8 – QRT IR.25.04.22 SCR – for groups using a partial internal model (Unaudited)

IR.25.04.22

Solvency Capital Requirement

Net of loss absorbing capacity of technical provisions

		C0010
	Market risk	
R0070	Interest rate risk	0
R0080	Equity risk	0
R0090	Property risk	0
R0100	Spread risk	0
R0110	Concentration risk	0
R0120	Currency risk	0
R0125	Other market risk	201,582
R0130	Diversification within market risk	-2,811
R0140	**Total Market risk**	198,771
	Counterparty default risk	
R0150	Type 1 exposures	0
R0160	Type 2 exposures	0
R0165	Other counterparty risk	38,330
R0170	Diversification within counterparty default risk	0
R0180	**Total Counterparty default risk**	38,330
	Life underwriting risk	
R0190	Mortality risk	0
R0200	Longevity risk	0
R0210	Disability-Morbidity risk	0
R0220	Life-expense risk	0
R0230	Revision risk	0
R0240	Lapse risk	0
R0250	Life catastrophe risk	0
R0255	Other life underwriting risk	2,869
R0260	Diversification within life underwriting risk	0
R0270	**Total Life underwriting risk**	2,869
	Health underwriting risk	
R0280	Health SLT risk	0
R0290	Health non SLT risk	0
R0300	Health catastrophe risk	0
R0305	Other health underwriting risk	0
R0310	Diversification within health underwriting risk	0
R0320	**Total Health underwriting risk**	0
	Non-life underwriting risk	
R0330	Non-life premium and reserve risk (ex catastrophe risk)	216,086
R0340	Non-life catastrophe risk	0
R0350	Lapse risk	0
R0355	Other non-life underwriting risk	0
R0360	Diversification within non-life underwriting risk	-56,792
R0370	**Total Non-life underwriting risk**	159,294
R0400	**Intangible asset risk**	0
	Operational and other risks	
R0422	Operational risk	35,640
R0424	Other risks	5,294
R0430	**Total Operational and other risks**	40,933
R0432	**Total before all diversification**	499,800
R0434	Total before diversification between risk modules	440,197
R0436	Diversification between risk modules	-193,043
R0438	**Total after diversification**	247,155
R0440	Loss absorbing capacity of technical provisions	0
R0450	Loss absorbing capacity of deferred tax	-37,300
R0455	Other adjustments	42,219
R0460	**Solvency capital requirement including undisclosed capital add-on**	252,074
R0472	Disclosed capital add-on - excluding residual model limitation	
R0474	Disclosed capital add-on - residual model limitation	
R0480	**Solvency capital requirement including capital add-on**	252,074
R0490	**Biting interest rate scenario**	
R0495	**Biting life lapse scenario**	
	Information on other entities	
R0500	Capital requirement for other financial sectors (Non-insurance capital requirements)	5,500
R0510	*Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies*	5,500
R0520	*Institutions for occupational retirement provisions*	
R0530	*Capital requirement for non- regulated entities carrying out financial activities*	
R0540	Capital requirement for non-controlled participation requirements	
R0550	Capital requirement for residual undertakings	
	Overall SCR	
R0555	Solvency capital requirement (consolidation method)	257,574
R0560	SCR for undertakings included via D and A	
R0565	SCR for sub-groups included via D and A	
R0570	**Solvency capital requirement**	257,574

Appendix 9 – QRT S.32.01.22 Undertakings in the scope of the group

S.32.01.22

Undertakings in the scope of the group

	Country	Identification code and type of code of the undertaking	Legal Name of the undertaking	Type of undertaking	Legal Form	Category (mutual/non mutual)	Supervisory Authority
Row	C0010	C0020	C0040	C0050	C0060	C0070	C0080
1	GB	[illegible]	Ecclesiastical Insurance Office plc	Non-life insurance undertaking	Company limited by shares or by guarantee or unlimited	Non-mutual	Prudential Regulation Authority
2	GB	[illegible]	Ecclesiastical Life Limited	Life insurance undertaking	Company limited by shares or by guarantee or unlimited	Non-mutual	Prudential Regulation Authority
3	GB	[illegible]	EdenTree Investment Management Limited	Credit institution, investment firm and financial institution	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
4	GB	[illegible]	EdenTree Asset Management Limited	Credit institution, investment firm and financial institution	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
5	GB	[illegible]	EdenTree Holdings Limited	Credit institution, investment firm and financial institution	Company limited by shares or by guarantee or unlimited	Non-mutual	
6	GB	[illegible]	Ecclesiastical Financial Advisory Services Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
7	GB	[illegible]	Ecclesiastical Planning Services Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
8	GB	[illegible]	Lycetts Holdings Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	
9	GB	[illegible]	Lycett Browne - Swinburne & Douglas Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
10	GB	[illegible]	Lycetts Risk Management Services Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
11	GB	[illegible]	Lycetts Financial Services Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
12	GB	[illegible]	Robertson Hollage Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
13	GB	[illegible]	Chariot Insurance Services Limited (Lycetts)	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
14	GB	[illegible]	E. G. Anderson & Co. Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
15	GB	[illegible]	Benefact Broking & Advisory Holdings Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	
16	GB	[illegible]	Benefact Group Plc	Insurance holding company as defined in the Glossary part of the PRA Rulebook	Company limited by shares or by guarantee or unlimited	Non-mutual	Prudential Regulation Authority
17	GB	[illegible]	Ecclesiastical Group Healthcare Trustees Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	
18	GB	[illegible]	E.I.O. Trustees Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	
19	GB	[illegible]	Benefact Management Services Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	
20	GB	[illegible]	Ecclesiastical Underwriting Management Limited	Ancillary services undertaking as defined in the Glossary part of the PRA Rulebook	Company limited by shares or by guarantee or unlimited	Non-mutual	
21	AU	[illegible]	Ansvar Insurance Limited	Non-life insurance undertaking	Company limited by shares or by guarantee or unlimited	Non-mutual	Australian Prudential Regulation Authority
22	AU	[illegible]	Ansvar Risk Management Services Pty Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	
23	AU	[illegible]	Ansvar Insurance Services Pty Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	

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Undertakings in the scope of the group

	Country	Identification code and type of code of the undertaking	Legal Name of the undertaking	Type of undertaking	Criteria of influence					
					% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation
Row	C0010	C0020	C0040	C0050	C0180	C0190	C0200	C0210	C0220	C0230
1	GB	[illegible]	Ecclesiastical Insurance Office plc	Non-life insurance undertaking	100.00%	100.00%	100.00%		Dominant	100.00%
2	GB	[illegible]	Ecclesiastical Life Limited	Life insurance undertaking	100.00%	100.00%	100.00%		Dominant	100.00%
3	GB	[illegible]	EdenTree Investment Management Limited	Credit institution, investment firm and financial institution	100.00%	100.00%	100.00%		Dominant	100.00%
4	GB	[illegible]	EdenTree Asset Management Limited	Credit institution, investment firm and financial institution	100.00%	100.00%	100.00%		Dominant	100.00%
5	GB	[illegible]	EdenTree Holdings Limited	Credit institution, investment firm and financial institution	100.00%	100.00%	100.00%		Dominant	100.00%
6	GB	[illegible]	Ecclesiastical Financial Advisory Services Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
7	GB	[illegible]	Ecclesiastical Planning Services Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
8	GB	[illegible]	Lycetts Holdings Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
9	GB	[illegible]	Lycett Browne - Swinburne & Douglas Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
10	GB	[illegible]	Lycetts Risk Management Services Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
11	GB	[illegible]	Lycetts Financial Services Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
12	GB	[illegible]	Robertson Hollage Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
13	GB	[illegible]	Chariot Insurance Services Limited (Lycetts)	Other	100.00%	100.00%	100.00%		Dominant	100.00%
14	GB	[illegible]	E. G. Anderson & Co. Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
15	GB	[illegible]	Benefact Broking & Advisory Holdings Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
16	GB	[illegible]	Benefact Group Plc	Insurance holding company as defined in the Glossary part of the PRA Rulebook					Dominant	
17	GB	[illegible]	Ecclesiastical Group Healthcare Trustees Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
18	GB	[illegible]	E.I.O. Trustees Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
19	GB	[illegible]	Benefact Management Services Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
20	GB	[illegible]	Ecclesiastical Underwriting Management Limited	Ancillary services undertaking as defined in the Glossary part of the PRA Rulebook	100.00%	100.00%	100.00%		Dominant	100.00%
21	AU	[illegible]	Ansvar Insurance Limited	Non-life insurance undertaking	100.00%	100.00%	100.00%		Dominant	100.00%
22	AU	[illegible]	Ansvar Risk Management Services Pty Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
23	AU	[illegible]	Ansvar Insurance Services Pty Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%

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Undertakings in the scope of the group

	Country	Identification code and type of code of the undertaking	Legal Name of the undertaking	Type of undertaking	Inclusion in the scope of Group supervision: YES/NO	Inclusion in the scope of Group supervision: Date of decision if art. 214 is applied	Group solvency calculation: Method used and under method 1, treatment of the undertaking
Row	C0010	C0020	C0040	C0050	C0240	C0250	C0260
1	GB	LEI/[illegible]	Ecclesiastical Insurance Office plc	Non-life insurance undertaking	Included in the scope		Method 1: Full consolidation
2	GB	LEI/[illegible]	Ecclesiastical Life Limited	Life insurance undertaking	Included in the scope		Method 1: Full consolidation
3	GB	LEI/[illegible]	EdenTree Investment Management Limited	Credit institution, investment firm and financial institution	Included in the scope		Method 1: Sectoral rules
4	GB	LEI/[illegible]	EdenTree Asset Management Limited	Credit institution, investment firm and financial institution	Included in the scope		Method 1: Sectoral rules
5	GB	SC/[illegible]	EdenTree Holdings Limited	Credit institution, investment firm and financial institution	Included in the scope		Method 1: Sectoral rules
6	GB	SC/[illegible]	Ecclesiastical Financial Advisory Services Limited	Other	Included in the scope		Method 1: Adjusted equity method
7	GB	SC/[illegible]	Ecclesiastical Planning Services Limited	Other	Included in the scope		Method 1: Adjusted equity method
8	GB	SC/[illegible]	Lycetts Holdings Limited	Other	Included in the scope		Method 1: Adjusted equity method
9	GB	SC/[illegible]	Lycett Browne - Swinburne & Douglas Limited	Other	Included in the scope		Method 1: Adjusted equity method
10	GB	SC/[illegible]	Lycetts Risk Management Services Limited	Other	Included in the scope		Method 1: Adjusted equity method
11	GB	SC/[illegible]	Lycetts Financial Services Limited	Other	Included in the scope		Method 1: Adjusted equity method
12	GB	SC/[illegible]	Robertson Hollaan Limited	Other	Included in the scope		Method 1: Adjusted equity method
13	GB	SC/[illegible]	Chelsea Insurance Services Limited (Lycetts)	Other	Included in the scope		Method 1: Adjusted equity method
14	GB	SC/[illegible]	G. D. Anderson & Co. Limited	Other	Included in the scope		Method 1: Adjusted equity method
15	GB	SC/[illegible]	Benefact Broking & Advisory Holdings Limited	Other	Included in the scope		Method 1: Adjusted equity method
16	GB	LEI/[illegible]	Benefact Group Plc	Insurance holding company as defined in the Glossary part of the PRA Rulebook	Included in the scope		Method 1: Full consolidation
17	GB	SC/[illegible]	Ecclesiastical Group Healthcare Trustees Limited	Other	Included in the scope		Method 1: Adjusted equity method
18	GB	SC/[illegible]	E.I.O. Trustees Limited	Other	Included in the scope		Method 1: Adjusted equity method
19	GB	SC/[illegible]	Benefact Management Services Limited	Other	Included in the scope		Method 1: Adjusted equity method
20	GB	SC/[illegible]	Ecclesiastical Underwriting Management Limited	Ancillary services undertaking as defined in the Glossary part of the PRA Rulebook	Included in the scope		Method 1: Full consolidation
21	AU	SC/[illegible]	Ansvar Insurance Limited	Non-life insurance undertaking	Included in the scope		Method 1: Full consolidation
22	AU	SC/[illegible]	Ansvar Risk Management Services Pty Limited	Other	Included in the scope		Method 1: Adjusted equity method
23	AU	SC/[illegible]	Ansvar Insurance Services Pty Limited	Other	Included in the scope		Method 1: Adjusted equity method

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Undertakings in the scope of the group

	Country	Identification code and type of code of the undertaking	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority
Row	C0010	C0020	C0040	C0050	C0060	C0070	C0080
[illegible]	GB	SC/[illegible]	Lloyd & Whyte Group Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Lloyd & Whyte Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Lloyd & Whyte Community Broking Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Lloyd & Whyte (Financial Services) Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Insurance Broking Finance Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Membership Plans Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Hi Specialty Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	[illegible] Policies Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	South [illegible] Insurance Holdings Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	SRB Insurance Brokers Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Specialist Broking Retail Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Sinos Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	The Federal Insurance Advisory Bureau Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Cheddar Holdings Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Cheddar Insurance Services Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Gwasio Underwriting Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Shaw Insurance Brokers Limited	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Baldwin Ltd	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority
[illegible]	GB	SC/[illegible]	Cleartrading Ltd	Other	Company limited by shares or by guarantee or unlimited	Non-mutual	Financial Conduct Authority

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Undertakings in the scope of the group

Row	Country	Identification code and type of code of the undertaking	Legal Name of the undertaking	Type of undertaking	Criteria of influence: % capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation
24	GB	[illegible]	Lloyd & Whyte Group Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
25	GB	[illegible]	Lloyd & Whyte Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
26	GB	[illegible]	Lloyd & Whyte Community Broking Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
27	GB	[illegible]	Lloyd & Whyte (Financial Services) Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
28	GB	[illegible]	Insurance Broking Finance Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
29	GB	[illegible]	Membership Plans Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
30	GB	[illegible]	VI Speciality Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
31	GB	[illegible]	Naturisure Policies Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
32	GB	[illegible]	South Essex Insurance Holdings Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
33	GB	[illegible]	SEIB Insurance Brokers Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
34	GB	[illegible]	Specialist Broking Retail Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
35	GB	[illegible]	Smile Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
36	GB	[illegible]	The Medical Insurance Advisory Bureau Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
37	GB	[illegible]	Cladeau Holdings Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
38	GB	[illegible]	Cladeau Insurance Services Limited	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
39	GB	[illegible]	Access Underwriting Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
40	GB	[illegible]	Gruut Insurance Brokers Limited	Other	100.00%	100.00%	100.00%		Dominant	100.00%
41	GB	[illegible]	Bodiem Ltd	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]
42	GB	[illegible]	Clearbroking Ltd	Other	[illegible]	100.00%	[illegible]		Dominant	[illegible]

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Undertakings in the scope of the group

Row	Country	Identification code and type of code of the undertaking	Legal Name of the undertaking	Type of undertaking	Inclusion in the scope of Group supervision: YES/NO	Date of decision if art. 214 is applied	Group solvency calculation: Method used and under method 1, treatment of the undertaking
24	GB	[illegible]	Lloyd & Whyte Group Limited	Other	Included in the scope		Method 1: Adjusted equity method
25	GB	[illegible]	Lloyd & Whyte Limited	Other	Included in the scope		Method 1: Adjusted equity method
26	GB	[illegible]	Lloyd & Whyte Community Broking Limited	Other	Included in the scope		Method 1: Adjusted equity method
27	GB	[illegible]	Lloyd & Whyte (Financial Services) Limited	Other	Included in the scope		Method 1: Adjusted equity method
28	GB	[illegible]	Insurance Broking Finance Limited	Other	Included in the scope		Method 1: Adjusted equity method
29	GB	[illegible]	Membership Plans Limited	Other	Included in the scope		Method 1: Adjusted equity method
30	GB	[illegible]	VI Speciality Limited	Other	Included in the scope		Method 1: Adjusted equity method
31	GB	[illegible]	Naturisure Policies Limited	Other	Included in the scope		Method 1: Adjusted equity method
32	GB	[illegible]	South Essex Insurance Holdings Limited	Other	Included in the scope		Method 1: Adjusted equity method
33	GB	[illegible]	SEIB Insurance Brokers Limited	Other	Included in the scope		Method 1: Adjusted equity method
34	GB	[illegible]	Specialist Broking Retail Limited	Other	Included in the scope		Method 1: Adjusted equity method
35	GB	[illegible]	Smile Limited	Other	Included in the scope		Method 1: Adjusted equity method
36	GB	[illegible]	The Medical Insurance Advisory Bureau Limited	Other	Included in the scope		Method 1: Adjusted equity method
37	GB	[illegible]	Cladeau Holdings Limited	Other	Included in the scope		Method 1: Adjusted equity method
38	GB	[illegible]	Cladeau Insurance Services Limited	Other	Included in the scope		Method 1: Adjusted equity method
39	GB	[illegible]	Access Underwriting Limited	Other	Included in the scope		Method 1: Adjusted equity method
40	GB	[illegible]	Gruut Insurance Brokers Limited	Other	Included in the scope		Method 1: Adjusted equity method
41	GB	[illegible]	Bodiem Ltd	Other	Included in the scope		Method 1: Adjusted equity method
42	GB	[illegible]	Clearbroking Ltd	Other	Included in the scope		Method 1: Adjusted equity method